

Roundtable on Sustainable Palm Oil Certification R S P O

[✓] Surveillance

Name of Management Organisation : **Palm Oil Mill 4 subsidiary of PT Dharma Satya Nusantara, Tbk.**
 Plantation Name : PT Swakarsa Sinarsentosa (Jabdan 1 Estate, Long Jenew 1 Estate and Long Jenew 2 Estate)
 Location : Benhes Village, Muara Wahau Sub-District, Kutai Timur District, Kalimantan Timur Province, Indonesia.
 Certificate Code : **MUTU-RSPO/060**
 Date of Initial Registration : 01 June 2015
 Date of Last Issued : 28 April 2020 Date of License Issue : 29 September 2022
 Date of Certificate Expiry : 31 May 2025 Date of License Expiry : 31 May 2023

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.1 (Remote Audit)	02 to 03 March 2021	Moh Arif Yusni (Lead Auditor), Asystasya Aishah Silalahi, Rindu Galih Rezza Rachmansyah and Arief Tajalli.	Briyogi Shadiwa	Leonada
ASA-1.1 & ASA-1.2 (Onsite Audit)	18 to 21 & 23 May 2022	Hasiholan Sihombing (Lead Auditor), Rahmat Abdiansyah, Sentot Adi Subandono, and Mia Rahmah Qadryani		

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.1 & ASA-1.2	02 September 2022

TABLE OF CONTENT

FIGURE

Figure 1. Location Map of POM 4 – PT Dharma Satya Nusantara, Tbk	1
Figure 2. Operational Map of POM 4 and PT Swakarsa Sinarsentosa	2
Abbreviations Used	3

1.0 SCOPE of the CERTIFICATION ASSESSMENT

1.1	Assessment Standard Used	5
1.2	Organization Information	5
1.3	Type of Assessment	5
1.4	Location of Mill and Plantations	5
1.5	Description of Area Statement	6
1.6	Planting Year and Cycle	6
1.7	Description of Mill and Supply Base	6
1.8	Tonnage of Product	8
1.9	Other Certifications	9
1.10	Time Bound Plan	9

2.0 ASSESSMENT PROCESS

2.1	Assessment Team	12
2.2	Assessment Methodology, Assessment Process and Locations of Assessment	13
2.3	Stakeholder Consultation and Stakeholders Contacted	17
2.4	Determining Next Assessment	17

3.0 ASSESSMENT FINDINGS

3.1	Summary of Assessment Report of the RSPO Certification	18
3.2	Conformity Checklist of Certificate and Logo Use	66
3.3	Summary of RSPO Partial Certification	67
3.4	Identification of Findings, Corrective Actions, Observations, Opportunity for Improvement and Noteworthy Positive Components	74
3.5	Summary of Arising Issues from Public and Auditor Verification	82

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

4.1	Formal Signing of Assessment Findings	87
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APPENDICES

1.	List of Stakeholders Contacted in the RSPO Certification Process	88
2.	Assessment Program	91

Figure 1. Location Map of POM 4 – PT Dharma Satya Nusantara, Tbk

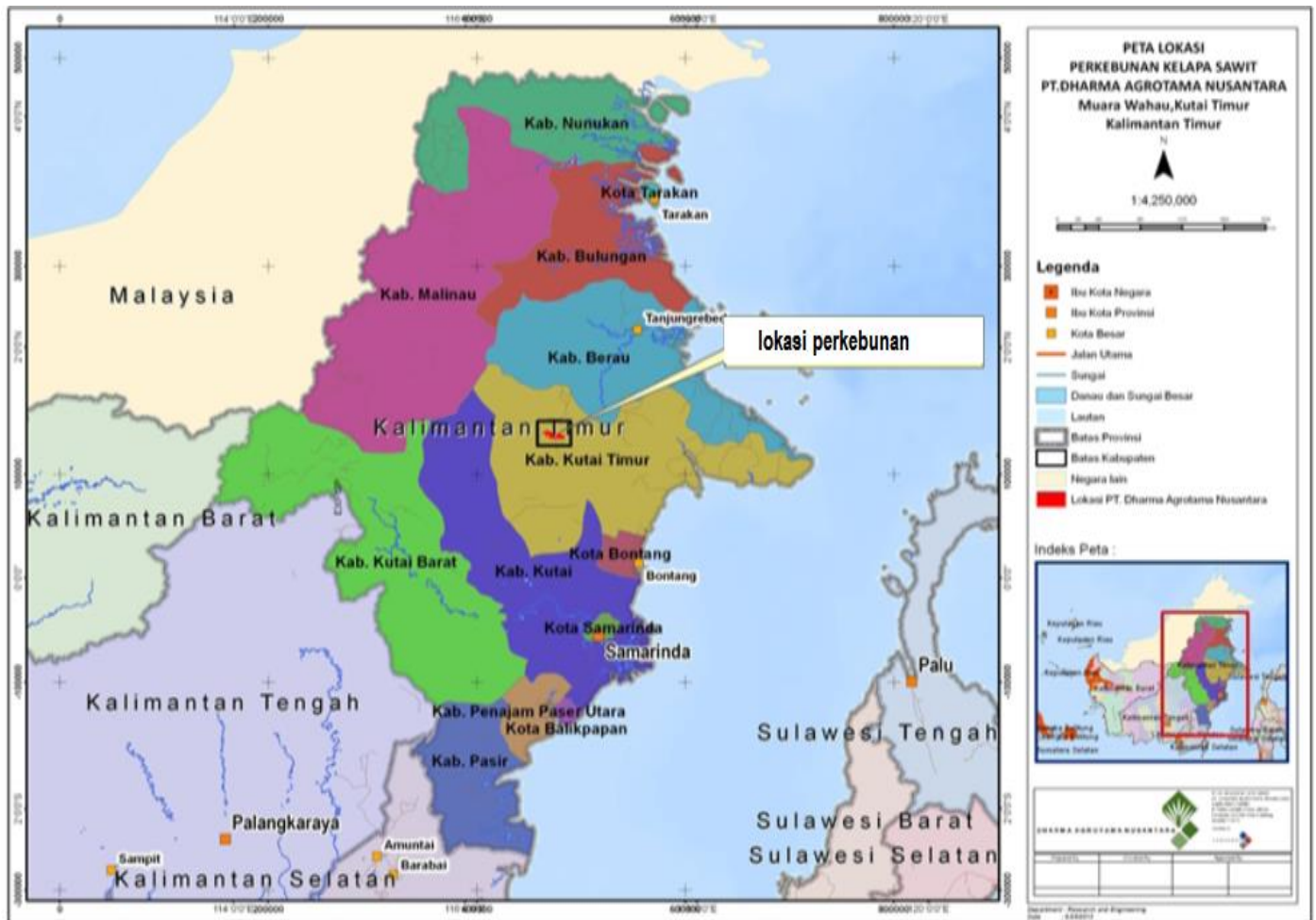
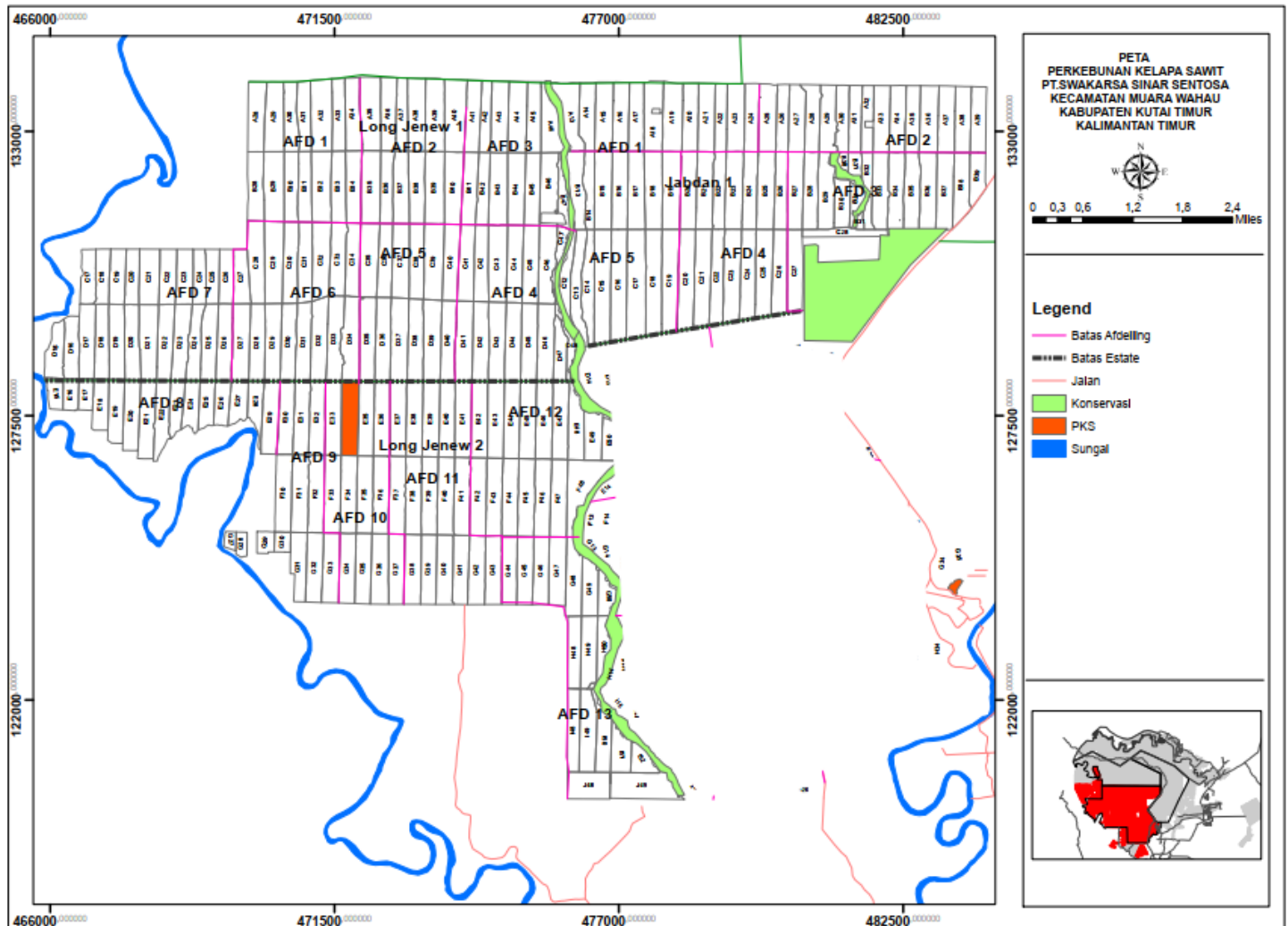


Figure 2. Operational Map of POM 4 and PT Swakarsa Sinarsentosa



Abbreviations Used

AMDAL	:	AMDAL
BOD	:	Biological Oxygen Demand
BPHTB	:	<i>Bea Perolehan Hak Atas Tanah dan Bangunan</i>
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial / Social Security Insurance</i>
CH	:	Certification Holder
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
DAN	:	PT Dharma Agrotama Nugraha
DIN	:	PT Dharma Intisawit Nugraha
DLH	:	Dinas Lingkungan Hidup
DPLH	:	<i>Dokumen Pengelolaan Lingkungan Hidup</i>
DSN	:	Dharma Satya Nusantara
EFB	:	Empty Fruit Bunch
EIA	:	Environmental Impact Assessment
FFB	:	Fresh Fruit Bunch
FPIC	:	Free Prior Inform and Consent
FR	:	Frequency Rate
GHG	:	Green House Gas
HCV	:	High Conservation Value
HGB	:	<i>Hak Guna Bangunan / Building Title</i>
HGU	:	<i>Hak Guna Usaha / Land Use Title</i>
HIRAC	:	Hazard Identification Risk Assessment and Control
IPM	:	Integrated Pest Management
ISCC	:	International Sustainability & Carbon Certification
ISPO	:	Indonesian Sustainability Palm Oil
IUCN	:	International Union for Conservation of Nature and Natural Resources
JB 1 Estate	:	Jabdan 1 Estate
KKPA	:	<i>Koperasi Kredit Primer Anggota</i>
KT	:	<i>Kelompok Tanil Farmer Group</i>
KUD	:	<i>Koperasi Unit Desa / Cooperative Village Unit</i>
LJ 1 Estate	:	Long Jenew 1 Estate
LJ 2 Estate	:	Long Jenew 2 Estate
LSU	:	Leaf Sampling Unit
LUC	:	Land Use Change
MSDS	:	Material Safety Data Sheet
OER	:	Oil Extraction Rate
OFI	:	Opportunity for improvement
OHS	:	Occupational Health and Safety
P & C	:	Principle & Criteria
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja/OHS Committee</i>
PIC	:	Person In Charge
PK	:	Palm Kernel
PKB	:	<i>Perjanjian Kerja Bersama (Collective Labor Agreement)</i>
PMPTSP	:	<i>Penanaman Modal & Pelayanan Terpadu Satu Pintu</i>
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent

PPE	:	Personnel Protective Equipment
PT	:	<i>Pekerja Tetap</i> (Permanent Worker)
PT DSN	:	PT Dharma Satya Nusantara
PT SWA	:	PT Swakarsa Sinarsentosa
RKL RPL	:	<i>Rencana Pengelolaan Lingkungan – Rencana Pemantauan Lingkungan</i> (Environment Management and Monitoring Plan)
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened, Endangered
RTRWP	:	<i>Rencana Tata Ruang Wilayah Provinsi</i> Province Spatial Plan
SCCS	:	Supply Chain Certification System
SEIA	:	Social & Environmental Impact Assessment
SHM	:	<i>Sertifikat Hak Milik</i> / Ownership Right Certificate / Free Hold Title
SIA	:	Social Impact Assessment
SKI	:	<i>Sistem Kendali Internal</i> / Internal Control System
SKU	:	<i>Syarat Kerja Umum</i> / Permanent Workers
SMD	:	Senior Managing Director
SOP	:	Standard Operational Procedure
SPO	:	Sustainable Palm Oil
SR	:	Severity Rate
SSU	:	Soil Sampling Unit
TBP	:	Time Bound Plan
UoC	:	Unit of Certification
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE OF THE CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used		
		<ul style="list-style-type: none">RSPO Certifications Systems for Principles & Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020).Indonesia National Interpretation RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSPO Board of Governors on 20th April 2020.	
1.2	Organisation Information		
1.2.1	Organization name listed in the certificate	PT Dharma Satya Nusantara, Tbk	
1.2.2	Contact person	Agustinus Triwibowo	
1.2.3	Organisation address and site address	RSPO registered company: Jl. Rawa Gelam V Kav. OR/3B, Kawasan Industri Pulo Gadung, Jakarta, Indonesia	
1.2.4	Telephone	+62-21-4618135	
1.2.5	Fax	+62-21-46834865	
1.2.6	E-mail	agustinus.triwibowo@dsn.co.id	
1.2.7	Web page address	www.dsn.co.id	
1.2.8	Management Representative who completed the application for certification	Agustinus Triwibowo	
1.2.9	Registered as RSPO member	1-0135-12-000-00 dated on 28 July 2008	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	1 POM (POM 4) with 3 supply bases: Jabdan 1 Estate; Long Jenew 1 Estate dan Long Jenew 2 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)
	POM 4	Benhes Village, Muara Wahau Sub-District, Kutai Timur District, Kalimantan Timur Province, Indonesia	N 01° 09' 06"E 116° 44' 46"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude (S)Longitude (E)
	Jabdan 1 Estate	Muara Wahau Village, Muara Wahau Sub-District, Kutai Timur District, Kalimantan Timur Province, Indonesia	N 01° 10' 53"E 116° 49' 44"
	Long Jenew 1 Estate	Benhes Village, Muara Wahau Sub-District, Kutai Timur District, Kalimantan Timur Province, Indonesia	N 01° 11' 14"E 116° 46' 56"
	Long Jenew 2 Estate	Benhes Village, Muara Wahau Sub-District, Kutai Timur District, Kalimantan	N 01° 07' 46"E 116° 43' 45"

	Timur Province, Indonesia						
1.5	Description of Area Statement						
1.5.1	Tenure						
	• State		16,850.00	Ha			
	• Community		-	Ha			
	Total		16,850.00	Ha			
*An area of 5,121 ha under operational Jabdan 2 Estate and not included scope of certification / audit POM 4							
1.5.2	Area Statement						
	Description		TOTAL (Ha)				
	Total area		11,729.00	Ha			
	Mature Planted		10,765.00	Ha			
	Mill		45.00	Ha			
	Road		216.00	Ha			
	Housing / Building		155.00	Ha			
	HCV (Secondary Forest)		325.00	Ha			
	Boundary Trench		39.00	Ha			
	Occupation		145.00	Ha			
*there is HCV area as river border with an area 69.82 Ha (included in hectare planted area)							
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)			Total (Ha)		
		Jabdan 1 Estate	Long Jenew 1 Estate	Long Jenew 2 Estate			
	1998	368	-	-	368		
	1999	654	-	564	1,218		
	2000	508	-	-	508		
	2001	747	-	1,434	2,181		
	2003	780	1,488	903	3,171		
	2004	-	2,839	439	3,278		
	2011	-	-	41	41		
	TOTAL	3,057	4,327	3,381	10,765		
1.6.2	New Planting area after January 2010			-	Ha		
1.6.3	Planting Cycle			1 st	Cycle		
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	POM 4	60	609,201.63	136,094.46	22.34	24,955.84	4.10
*Production data source from 24 months before assessment (May 2020 – April 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)
						%
	Jabdan 1 Estate	3,508	3,057	141,323.38	23.11	39,084.05
	Long Jenew 1 Estate	4,446	4,327	203,903.80	23.56	156,472.97
	Long Jenew 2 Estate	3,775	3,381	171,550.31	25.37	166,589.77
	TOTAL	11,729	10,765	516,777.49	24.00	362,146.79
	<i>*Production data source from May 2020 to April 2022</i>					
	<i>**The remaining FFB production has been sent to POM 1 (RSPO Certified Mill)</i>					
1.7.3	FFB description from other source					
	Name of sources/Organisation (RSPO certified / non-certified)	Type of Organisation	Number of smallholders	Production Area (Ha)	Supplied to Mill	
					FFB (tonnes/year)	
	Jabdan 2 Estate – RSPO Certified	PT Swakarsa Sinarsentosa	-	4,517.00	52,740.13	
	Kemitraan 3 (Harapan Baru Cooperative) – RSPO Certified	Plasma of PT Dharma Intisawit Nugraha	674	1,148	2,397.11	
	Kemitraan 6 (Kel'ean Blom Kejah Cooperative) – RSPO Certified	Plasma of PT Dharma Intisawit Nugraha	72	150	34.76	
	Kemitraan 1 (Min Sun Lekut Cooperative) - RSPO Non-Certified	Plasma of PT Swakarsa Sinarsentosa	180	1,928	75,008.15	
	Kemitraan 2 (Min Bea Glang Mandiri Cooperative) - RSPO Non-Certified	Plasma of PT Swakarsa Sinarsentosa	80	506	17,956.90	
	Kemitraan 3 (Harapan Baru Cooperative) – RSPO Non-Certified	Plasma of PT Dharma Intisawit Nugraha	674	385	1,110.50	
	Kemitraan 4 (Gerdabang Agri Center Cooperative) – RSPO Non-Certified	Plasma of PT Dharma Agrotama Nusantara	175	568	22,442.60	
	Kemitraan 8 (Sawit Wehea Tlan Sejahtera Cooperative) – RSPO Non-Certified	Plasma of PT Dewata Sawit Nusantara	491	284	7,534.12	
	Kemitraan 10 (Jengea Bong Pet Kuq Cooperative) – RSPO Non-Certified	Plasma of PT Dharma Agrotama Nusantara	244	2,087	62,251.41	
	Kemitraan 11 (Usaha Baru Cooperative) – RSPO Non-Certified	Plasma of PT Dharma Agrotama Nusantara	95	226	17.23	
	Semoga Sawit Wahau Sejahtera Cooperative (Muara Wahau Village) – RSPO Non-Certified	Independent Smallholder	-	-	590.91	
	Semoga Sawit Wahau Sejahtera Cooperative (Diak Lay Village) – RSPO Non-Certified	Independent Smallholder	-	-	755.89	
	Min Sun Lekut Cooperative (Independent) – RSPO Non-Certified	Independent Smallholder	-	-	2,285.79	
	Kop Min Bea Glang Cooperative (Independent) – RSPO Non-Certified	Independent Smallholder	-	-	30.52	
	Serba Usaha Harapan Baru Cooperative (Independent) – RSPO Non-Certified	Independent Smallholder	-	-	1,031.11	
	Sawit Usaha Tani Sejahtera Cooperative – RSPO Non-Certified	Independent Smallholder	-	-	278.64	
	Semoga Sawit Wahau Sejahtera	Independent	-	-	50.20	

	Cooperative (Wanasari Village) – RSPO Non-Certified	Smallholder						
	Semoga Sawit Wahau Sejahtera Cooperative (Karya Bakti Village) – RSPO Non-Certified	Independent Smallholder	-	-	20.12			
	PT Roni Putra – RSPO Non-Certified	Independent Supplier	-	-	275.20			
	TOTAL				246,811.29			
	*Production data source from May 2020 to April 2022							
1.7.4	Product categories	FFB, CPO, PK						
1.8	Tonnage of Product							
1.8.1	Past Annual Claim Certified Product	Last Year Projected Certified Volume + Ext Volume (MT)		Last Year Actual Certified Volume (MT)				
	FFB Processed	445,978		417,284.03				
	CPO Production	94,723		93,131.28				
	Palm Kernel (PK) Production	17,283		17,033.93				
1.8.2	Product selling							
	Type of selling product	Actual selling product for last year (MT)						
	CSPO sold as RSPO certified product	0						
	CSPK sold as RSPO certified product	13,580.94						
	CSPO sold under another scheme	69,000						
	CSPK sold under another scheme	0						
	CSPO sold as conventional	17,621						
	CSPK sold as conventional	0						
1.8.3	Estimate of Certified FFB Claim							
	Name of Estate(s)	Total Area (Ha)	Production Area (Ha)	FFB (tones/year)	Yield (tones/ha/year)			
	Jabdan 1 Estate	3,508	3,057	75,000	24.53			
	Long Jenew 1 Estate	4,446	4,327	110,000	25.42			
	Long Jenew 2 Estate	3,775	3,381	90,000	26.62			
	TOTAL	11,729	10,765	275,000	25.55			
	*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 Out put (tones)	CPO Extraction (%)	Palm Kernel Out put (tones)	Palm Kernel Extraction (%)	Supply Chain Module
	POM 4	60	275,000	62,500	22.73	12,500	4.55	MB
	*Projected CSPO and CSPK production for 12 months of certificate							
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			Certificate No. EU-ISCC-Cert-ID215-23211172 valid until 12				

				November 2022		
	ISPO			Certificate No. MISB-ISPO/018 valid until 29 November 2022.		
1.10	Time Bound Plan					
1.10.1	Time Bound Plan for Other Management units					
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status
	Mill	Time Bound Plan				
	POM 1 (PT SWA)	June 2012	Jabdan 2 (PT SWA)	2012	Kutai Timur District, Kalimantan Timur Province	Certified
			Smallholder (KM 5.9)	2015		Certified
			Smallholder (KM 3,6,11,12)	2017		Certified
	POM 2 (PT DSN)	June 2013	PT Dharma Agrotama Nusantara	2013	Kutai Timur District, Kalimantan Timur Province	Certified
			Smallholder	2023		Waiting RaCP
	POM 3 (PT DSN)	August 2013	PT Dharma Intisawit Nugraha	2013	Kutai Timur District, Kalimantan Timur Province	Certified
	POM 4 (PT DSN)	Nov 2014	Jabdan 1 (PT DSN)	2015	Kutai Timur District, Kalimantan Timur Province	Certified
			Long Jenew 1 (PT SWA)			Certified
			Long Jenew 2 (PT SWA)			Certified
			Smallholder	2023		Waiting RaCP
	POM 5 (PT DSN)	2023	PT Pilar Wanapersada	2021	Lamandau District, Kalimantan Tengah Province	Has been conduct audit Stage-1 in 2021
			Smallholder	2023		-
	POM 6 (PT DSN)	2019	PT Dewata Sawit Nusantara	2019	Kutai Timur District, Kalimantan Timur Province	Certified
			Smallholder	2023		-
	POM 7 (PT DSN)	2019	Melenyu 4 (PT Dewata Sawit Nusantara)	2019	Kutai Timur District, Kalimantan Timur Province	Certified
			LTE HGU 504 (PT Karya Prima Agro Sejahtera)	2021		Certified
			LTE (PT Karya Prima Agro Sejahtera)	2023		-
			SWE (PT Karya Prima Agro Sejahtera)	2023		-
Smallholder (KM 9)			2015	Certified		
-	-	PT Dharma Intisawit Lestari	2021	Bulungan District, Kalimantan Timur Province	Has been conduct audit Stage-1 in 2021	
		Smallholder	2023	Bulungan District, Kalimantan Timur Province		

			PT Karya Prima Agro Sejahtera	2020	Kutai Timur District, Kalimantan Timur Province	Certified
			Smallholder	2023		-
			PT Putra Utama Lestari	2022	Kutai Barat District, Kalimantan Timur Province	RaCP On Process
			Smallholder	2023		-
POM 8 PT Agro Andalan			PT Agro Andalan	2022	Sekadau District, Kalimantan Barat Province	RaCP On Process
			Smallholder	2023		RaCP On Process
			PT Kencana Alam Permai	2022	Sintang District, Kalimantan Barat Province	Zero Liability
			Smallholder	2023		Zero Liability
			PT Prima Sawit Andalan	2022	Sintang District, Kalimantan Barat Province	Zero Liability
			Smallholder	2023		Zero Liability
			PT Dharma Persada Sejahtera	2022	Sintang District, Kalimantan Barat Province	Zero Liability
			Smallholder	2023		Zero Liability
POM 9 Tepian Langsat	2021		PT Bima Palma Nugraha	2021	Bengalon District, Kalimantan Timur Province	Has been conduct audit Stage-1 in 2021
			Smallholder	2023		RaCP On Process
POM 10 Muara Bulan	2021		PT Bima Agri Sawit	2022	Kutai Timur District, Kalimantan Timur Province	RaCP On Process
			Smallholder	2023		RaCP On Process
	2022		PT Mitra Nusa Sarana	2022	Sintang District, Kalimantan Barat Province	RaCP On Process
			Smallholder	2023		RaCP On Process
	PT Dharma Satya Nusantara has committed to obtain RSPO Certificate to all management unit in accordance with TBP that has been set. MUTU has considered that PT Dharma Satya Nusantara is complied with the RSPO requirement for Time Bound Plan. There are several adjustments of TBP compare with previous TBP due to adjustment of to legal issue, RACP Process and COVID outbreak. The Time Bound Plan was revised and declared by PT Dharma Satya Nusantara on 12 January 2022 and signed by Head of Sustainability.					
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard					
	The scheme smallholder under PT Swakarsa Sinarsentosa is Cooperative of Min Sun Lekut (Kemitraan 1), Cooperative of Min Bea Glang Mandiri (Kemitraan 2) and Cooperative of Jengea Bong Pet Kuq (Kemitraan 10). Those cooperatives have entered the initial assessment phase, but now is still not certified and has been included into Timebound Plan in 2023.					

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.1 (Remote 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 verifies Legality and Social. Asystasya Aishah Silalahi (Auditor). Indonesia Citizen, Bachelor of Economy, Major of Agribusiness, Faculty of Economic and Management. She has one-year experience in consultancy. She has followed training such as ISPO Auditor Training, Lead Auditor ISO 9001:2015, OHS General Expert, RSPO lead auditor training course, SCCS, and several in house training related to environmental, BMP, SA 8000, etc. Has been involved in several audit activities since 2016 related to sustainable palm oil certification covering waste management aspect, Social Aspect, Health and Safety Aspect, and Worker Welfare. During this audit, she verifies Social, Worker Welfare aspects and SCCS. 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 and 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 BMP, and transparency aspect. Arief Tajalli (Auditor Trainee). Indonesian citizen, Bachelor of Forest Resources Conservation and Ecotourism, Faculty of Forestry, Bogor Agricultural University. Has been involved as a researcher at a wildlife laboratory, Faculty of Forestry, IPB. The trainings that have been attended include training for ISO 9001; 2008, ISO 14001; 2004, ISO 17021; 2015, ISO 17065, ISO 19011, ISPO Auditor training, and participating in several IHT in the field of environment, BMP, and so on. Has participated in several audit simulation activities related to the sustainable palm oil certification system since 2020 with social and environmental aspects, and aspects of waste management. In this activity, he became an Auditor trainee under the supervision of the lead auditor.
ASA-1.1 & ASA-1.2 (Onsite Audit)	<ol style="list-style-type: none"> Hasiholan Sihombing (Lead Auditor). Indonesian citizen. Bachelor of Agriculture Majoring in Agronomy, Agriculture Faculty. He has working experienced for 7 (seven) years since 2009 as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The training he has followed namely: Lead Auditor ISPO, RSPO P&C Lead Auditor Course, RSPO Supply Chain Certification Lead Auditor Course, SA 8000 Awareness, Quality Management Systems (ISO 9001:2015), Environmental Management Systems (ISO 14001:2015), OHS General Expert, OHSAS 18001:2007, ISO 19011:2018, ISO 17021:2011 and ISO 17065:2012. During this audit, he assigned to verify transparency, legal aspect, land dispute, timebound plan, partial certification and SCCS. Rahmat Abdiansyah (Auditor). Indonesian citizen. Bachelor of Forestry from IPB University, with major in Forest Resources Conservation and Ecotourism. Has experience working in the Indonesian Palm Oil Farmers Organization and Indonesian private oil palm plantation companies. Participate in ISPO and RSPO Internal Auditor training in 2018, ISPO and P&C Certification Systems IHT in 2019, IHT ISO 19011, ISPO Auditor Training in 2020, RSPO Lead Auditor Training in 2020, ISO 14001 and ISO 9001 Lead Auditor Training in 2020, and awareness of the RSPO Certification System and the RSPO P&C in 2019 and 2020. During this assessment, he verified the aspects of environment, Social, conservation and GHG aspect. Sentot Adi Subandono (Auditor). Indonesia citizen, Bachelor of Agriculture, Department of Agricultural Cultivation. He has five years of experience working since 2005 as Plantation Operational Staff and nine years as Internal Auditor in private oil palm plantations in Indonesia. The training that has been attended includes the Basic Management Development Program of Palm Oil Plantation, Use of Limited Pesticides, Best Practices in Internal Auditing, Fraud Auditing: Prevention, Detection, and Investigation, Operational Risk Approach in Internal Auditing, General Occupational Health and Safety Expert, ISPO Auditor Training in 2016, ISO 9001: 2015, RSPO Lead Auditor Training in 2020. During this assessment, verified the aspects of Best Management Practices and OHS

<p>Aspect.</p> <p>4. Mia Rahmah Qadryani (Trainee Auditor). Indonesian citizen. Bachelor of Agriculture Majoring in Pest and Plant Disease, Universitas Padjadjaran. The training she has followed namely: ISO 9001, ISO 19011, ISPO Auditor training, Awareness ISO 17021, Awareness ISO 17065, Awareness ISO 9001, Awareness ISO 14001, Awareness ISO 45001, and Awareness ISO 19011. She has participated in several audit simulation activities related to the social and worker welfare. During this audit, she verified Worker Welfare and Transparencies supervised by Lead Auditor.</p> <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.</p>	
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1.1 (Remote Audit)	<p>Number of auditors: 3 auditor and 1 trainee auditor</p> <p>Number of days for Remote audit ASA-1.1: 2 days</p> <p>Number of working days for Remote audit ASA-1.1 document review: 6 Working days</p>
ASA-1.1 & ASA-1.2 (Onsite Audit)	<p>Number of auditors: 3 auditors and 1 trainee auditor</p> <p>Number of days for ASA 1.1 + ASA 1.2 Onsite Audit: 6 days</p> <p>Number of working days for ASA 1.1 + ASA 1.2 Onsite Audit: 18 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 POM 4 PT Dharma Satya Nusantara to 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, 14 June 2017.</p> <p>PT Swakarsa Sinarsentosa consist of four (4) estate (Jabdan 1 Estate, Jabdan 2 Estate, Long Jenew 1 Estate and Long Jenew 2 Estate) with the total of land title is 16,850 Ha, however the scope of certification consists of three (3) Estate covering 11,729 Ha (Jabdan 1 Estate, Long Jenew 1 Estate and Long Jenew 2 Estate) and the rest of the area 5,121 Ha (Jabdan 2 Estate) is under scope of POM 1.</p> <p>For this section (ASA 1.1.) The assessment was conducted in through document review and interview with management which 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 02 March 2021 at 08.00 am through a teleconference (google meet). 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 03 March 2021 at 15.30 pm. attended by the same participants as the opening meeting. Commonly, the audit activities went smoothly with good support from the unit management. The presentation of documents is presented quite well using email or one drive</p> <p>The assessment program please find Appendix 2 assessment program please find Appendix</p>
ASA-1.1 & ASA-1.2 (Onsite Audit)	<p>The assessment was conducted by measuring the implementation of certification system and standard conducted by PT Dharma Satya Nusantara, POM 4 based on:</p> <ul style="list-style-type: none"> RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20th April 2020 RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020 <p>Additional Documents:</p> <ul style="list-style-type: none"> Contingency RSPO Audit Procedure for RSPO Principles and Criteria (P&C) and Independent Smallholder (ISH) Standard, Version 2, this procedure is only applicable when a force majeure event prevents the audit team from

conducting field verifications. Approved by Assurance Standing Committee on 22 October 2022

The scope of certification of consist of one mill (POM 4) and three estates (Jabdan 1 Estate, Long Jenew 1 Estate, and Long Jenew 2 Estate). Currently, the process of certification in POM 4 is already in the 2nd cycle.

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

The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site. Some opportunities for improvement of the results ASA-1.1 and ASA-1.2 by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase Recertification. Improvement of findings from ASA-1.1 findings were observed by auditors at this ASA-1.1 and ASA-1.2 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.1 & ASA-1.2.

The auditor departed on 17 May 2022 from Jakarta to Samarinda by flight, then from the airport in Samarinda continued a 10-hour road trip to the audit location in East Kutai Regency. The opening meeting was held on 18 May 2022. As for the participants who attended the opening meeting included Estate and Mill Managers, Support Team from Jakarta and other staffs. Closing meeting was held on 23 May 2022 attended by the same participants as the opening meeting. Management PT Dharma Satya Nusantara accept all the onsite ASA-1.1 & ASA-1.2 audit results.

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

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

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

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

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

The assessment program please find Appendix 2.

2.2.3	Locations of Assessment
ASA-1.1 (Remote)	Will be completed during the onsite audit.

Audit)	
ASA-1.1 & ASA-1.2 (Onsite Audit)	<p>The sampling location consider the issue arise from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>POM 4</p> <ul style="list-style-type: none"> • Security. Observation and interview related work practices according to procedures, OHS aspect, and worker welfare. • Weighbridge. Observation and interview related SCCS implementation, OHS and employment. • WWTP. Field observations related to WWTP entry, runoff, effluent testing. Officers are equipped with PPE and effluent discharge records. • Water Source Reservoir. Observations and interviews related to water management, recording of water use, health checks, PPE and waste management. • Employee Housing. Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, educational facilities, religious facilities, health facilities and sports facilities. • Biogas plan. Observation of material handling, OHS, and handling of hazardous materials. • WTP. Observations and interviews related to water management, recording of water use, health checks, PPE and waste management. • Empty bunch area. Field observations related to empty bunch management. • Hazardous Waste Temporary Warehouse. Field observations and interview related hazardous waste management, OHS and environmental aspect. • Chemical warehouse. Field observations and interview related chemical management, OHS, and environmental aspect. • Fuel warehouse. Field observations and interview related chemical management, OHS, and environmental aspect. • Workshop. Field observations and interview related workshop activity, OHS, environmental and worker welfare aspect. • Grading Station. Observations and interview related to FFB quality, handling of FFB that did not pass the criteria, OHS and employment. • Sterilizer Station. Observation and interview related work practices according to procedures, OHS aspect, and worker welfare. • Tipler Station. Observation and interview related work practices according to procedures, OHS aspect, and worker welfare. • FFB process stations Observations and interview related to best practices, OHS, license, and employment. • Boiler Station. Observations related to OHS, understanding of emergency response, and operator licenses • Engine room Station. Observation and interview related work practices according to procedures, OHS aspect, and worker welfare. • Kernel Station. Observation and interview related work practices according to procedures, OHS aspect, and worker welfare. • Hydrant simulation. Observation related emergency response, readiness of firefighting equipment. <p>Jabdan 1 Estate</p> <ul style="list-style-type: none"> • Block C28 Afdeling 3 (HGU Pole No. BPN 201, BPN 188, BPN 177, BPN 175). Observation the conditions and position of legal boundary. • Block B38 Afdeling 3 (HGU Pole No. BPN 164). Observation the conditions and position of legal boundary. • Block A39 Afdeling 2 (HGU Pole No. BPN 157, BPN 145, BPN 143). Observation the conditions and position of legal boundary. • Block C28 Afdeling 3 (HCV - Forest Conservation Block VI). Observation of HCV management. • FFB Harvesting, Block C22/C23, Afdeling 4. Observation and interview related FFB quality, harvesting round, OHS, and employment. • FFB Manual Loading Block A25, Afdeling 2. Observation and interview related work practices according to procedures, OHS aspect, and worker welfare. • Pest and Plant Disease Census, Block B32, Afdeling 3. Observation related pest census procedure, OHS, and

worker welfare.

- **Pesticides Application, Block A15, Afdeling 1.** O Observation and interview related work practices according to procedures, OHS aspect, and worker welfare.
- **Fire Monitoring Tower, Block A21, Afdeling 1.** Observation fire monitoring tower, and the fire patrol.
- **Barn Owl Box, Block C59, Afdeling 5.** Observation related to the pest controlling management.
- **Turnera ulmivolia, Block A21, Afdeling 1.** Observation related beneficial plant condition.
- **Antigonon leptosus, Block A28, Afdeling 2.** Observation related beneficial plant condition.
- **Fire Fighting Facilities and Simulation.** Observation and simulation the emergencies response facilities.
- **Daycare.** Observation and interview with worker related labor aspect and OHS.
- **Spare part and PPE warehouse.** Observation minimum stock of PPE's.
- **Diesel Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Oil and Agrochemicals Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Hazardous Waste Temporary Warehouse.** Field observations and interview related hazardous waste management, OHS and environmental aspect.
- **Workshop.** Observations and interviews related to wages and overtime, waste management activities, OHS implementations and health inspections.
- **Fertilizer warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Generator (Electricity) Afdeling 5.** Observation for waste management, and interviews related to workers facility, electricity, domestic waste, sources of fresh water, socialization of company policy and complaint mechanism.
- **Housing Complex.** Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.
- **Pesticide mixing area and PPE storage:** observation related pesticide mixing area, PPE storage, safety aspect.
- **Landfill Block A19 Afdeling 1.** Observations related to domestic waste management.
- **Clinic.** Observations and interviews of health, environmental, training, and employment facilities.
- **Kenden River Border Block B13 Afdeling 5.** Observation the implementation of management in HCV of riparian area.

Long Jenew 1 Estate

- **Block C17 Afdeling 7 (HGU Pole No. BPN 645, BPN 614, BPN 615).** Observation the conditions and position of legal boundary.
- **Block C27 Afdeling 6 (HGU Pole No. BPN 654).** Observation the conditions and position of legal boundary.
- **Block C28 Afdeling 6 (HGU Pole No. BPN 656).** Observation the conditions and position of legal boundary.
- **Block B28 Afdeling 1 (HGU Pole No. BPN 660, BPN 663).** Observation the conditions and position of legal boundary.
- **Block A28 Afdeling 1 (HGU Pole No. BPN 677, BPN 679, BPN 682).** Observation the conditions and position of legal boundary.
- **Block B47 Afdeling 3 (HCV – Riparian of Kenden Kecil River).** Observation of HCV management.
- **FFB Harvesting, Block C36, Afdeling 5.** Observation and interview related FFB quality, harvesting round, OHS, and worker welfare.
- **Manual Path Weeding and EFB application, Block C36, Afdeling 5.** Observation and interview related manual weeding procedure, EFB application, OHS, and worker welfare.
- **Manual circle Weeding, Block A36, Afdeling 2.** Observation and interview related manual weeding procedure, OHS, and worker welfare.
- **Turnera ulmivolia and Antigonon leptosus, Block C46/47, Afdeling 4.** Observation related beneficial plant condition.
- **Fire Monitoring Tower, Block C37, Afdeling 5.** Observation fire monitoring tower, and the fire patrol.
- **Barn Owl Box, Block B46, Afdeling 3.** Observation related to the pest controlling management.
- **Fire Fighting Facilities and Simulation.** Observation and simulation the emergencies response facilities.
- **Daycare.** Observation and interview with worker related labor aspect and OHS.

- **Spare part and PPE warehouse.** Observation minimum stock of PPE's.
- **Diesel Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Oil and Agrochemicals Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Hazardous Waste Temporary Warehouse.** Field observations and interview related hazardous waste management, OHS and environmental aspect.
- **Workshop.** Observations and interviews related to wages and overtime, waste management activities, OHS implementations and health inspections.
- **Fertilizer warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Generator (Electricity) Afdeling 3.** Observation for waste management, and interviews related to workers facility, electricity, domestic waste, sources of fresh water, socialization of company policy and complaint mechanism.
- **Housing Complex Afdeling 3.** Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.
- **Pesticide mixing area and PPE storage:** observation related pesticide mixing area, PPE storage, safety aspect.
- **Landfill Block C36 Afdeling 5.** Observations related to domestic waste management.
- **Clinic.** Observations and interviews of health, environmental, training, and employment facilities.

Long Jenew 2 Estate

- **Block G45 Afdeling 13 (HGU Pole No. BPN 437).** Observation the conditions and position of legal boundary.
- **Block G47 Afdeling 13 (HGU Pole No. BPN 428 and BPN 427).** Observation the conditions and position of legal boundary.
- **Block G48 Afdeling 13 (HGU Pole No. BPN 426 and BPN 425).** Observation the conditions and position of legal boundary.
- **Block H48 Afdeling 13 (HGU Pole No. BPN 422).** Observation the conditions and position of legal boundary.
- **Block J48 Afdeling 13 (HGU Pole No. BPN 390, BPN 388 and BPN 385).** Observation the conditions and position of legal boundary.
- **Block F42 Afdeling 12 (Land Application).** Observation land application area and interview with the workers regarding the application system for POME (Palm Oil Mill Effluent).
- **Block G50 Division 13 (HCV – Riparian of Kenden Kecil River).** Observation of HCV management.
- **Fire Fighting Facilities and Simulation.** Observation and simulation the emergencies response facilities.
- **Daycare.** Observation and interview with worker related labor aspect and OHS.
- **Spare part and PPE warehouse.** Observation minimum stock of PPE's.
- **Diesel Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Oil and Agrochemicals Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Hazardous Waste Temporary Warehouse.** Field observations and interview related hazardous waste management, OHS and environmental aspect.
- **Workshop.** Observations and interviews related to wages and overtime, waste management activities, OHS implementations and health inspections.
- **Fertilizer warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Generator (Electricity) Afdeling 12.** Observation for waste management, and interviews related to workers facility, electricity, domestic waste, sources of fresh water, socialization of company policy and complaint mechanism.
- **Housing Complex Afdeling 12.** Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.
- **Pesticide mixing area and PPE storage:** observation related pesticide mixing area, PPE storage, safety aspect.
- **Landfill Block F45 Afdeling 12.** Observations related to domestic waste management.
- **Clinic.** Observations and interviews of health, environmental, training, and employment facilities.
- **FFB Harvesting, Block F47, Afdeling 12.** Observation and interview related FFB quality, harvesting round, OHS, and worker welfare.

	<ul style="list-style-type: none"> • FFB Mecanis Loading Block G41, Afdeling 11. Observation and interview related work practices according to procedures, OHS aspect, and worker welfare. • Pesticides Application, Block H48, Afdeling 13. Observation and interview related work practices according to procedures, OHS aspect, and worker welfare. • Barn Owl Box. Block F46, Afdeling 12. Observation related to the pest controlling management. • Turnera ulmivolia and Antigonon leptosus, Block G44/45, Afdeling 13. Observation related beneficial plant condition.
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
	<p>Summary of stakeholder consultation process for PT DSN POM 4 and PT Swakarsa Sinarsentosa was held by:</p> <ul style="list-style-type: none"> • Public Notification on website on RSPO and MUTU Website on 4 May 2022. • Public consultation meeting with government institution on 18-19 May 2022. • Public consultation meeting with communities on 18-19 May 2022. • Public consultation meeting with internal stakeholders and contractor on 18 to 21 May 2022. • Public consultation with NGOs (by email) such as WALHI, AMAN, WWF, and Sawit Watch on 10 May 2022. <p>Numbers of input from stakeholders were clarified by PT DSN POM 4.</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 date of annual license.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Palm Oil Mill 4 (POM-4) – PT Dharma Satya Nusantara operation consisting of one (1) mill and three (3) oil palm estates.

During the assessment, there were one (1) Nonconformity were assigned against Major Compliance Indicator; one (1) nonconformity were assigned against Minor Compliance Indicators and five (5) opportunities for improvement were identified.

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

MUTUAGUNG LESTARI found that POM 4 PT Dharma Satya Nusantara complied with the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1	The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1	Unit of certification showed SOP of communication and handling external grievance (SOP-AGR-044-R02) validated on 14 October 2019 which explains the types of documents which are publicly accessible such as vision and mission, company policies, AMDAL documents, HGU permits, company regulations, plantation maps, etc. These documents can be accessed by sending a request to the management.	
1.1.2	Companies can show records of providing information to relevant agencies in the form of routine reports, for example: Plantation Legality <ul style="list-style-type: none"> Plantation progress report (LPUP) of PT Swakarsa Sinarsentosa and PT Dharma Satya Nusantara (POM 4) period of Triwulan I 2022 has been sent to Plantation Agency of Kutai Timur District on 10 April 2022. HGU utilization report of PT Swakarsa Sinarsentosa for the period of 2021 has been sent to Land Agency of Kutai Timur District on 10 January 2022. The company has reported several reports on environmental aspects, namely: <ul style="list-style-type: none"> Report on the Implementation of the RKL-RPL semester 1 2021 PT Swakarsa Sinar Sentosa to the East Kutai Regency Environmental Service on August 10, 2021. Report on the Implementation of the RKL-RPL semester 2 2021 PT Swakarsa Sinar Sentosa to the East Kutai Regency Environmental Service on January 20, 2022. 	

- Report on the Implementation of RKL-RPL semester 1 2021 PT Dharma Satya Nusantara – POM 4 to the East Kutai Regency Environmental Service on August 8, 2021.
- Report on the Implementation of RKL-RPL semester 2 2021 PT Dharma Satya Nusantara – POM 4 to the East Kutai Regency Environmental Service on January 20, 2022.
- Report on the Management of Hazardous and Toxic Waste for Quarter 1 of 2022 PT Swakarsa Sinar Sentosa to the Environmental Service of East Kutai Regency on April 26, 2022.
- Report on the Management of Hazardous and Toxic Waste for Quarter 1 of 2021 PT Swakarsa Sinar Sentosa to the Environmental Service of East Kutai Regency on April 12, 2021.
- Report on the Management of Hazardous and Toxic Waste for Quarter 2 2021 of PT Swakarsa Sinar Sentosa to the Environmental Service of East Kutai Regency on August 25, 2021.
- Report on the Management of Hazardous and Toxic Waste for Quarter 3 of 2021 PT Swakarsa Sinar Sentosa to the Environmental Service of East Kutai Regency on October 2, 2021.
- Report on the Management of Hazardous and Toxic Waste for Quarter 4 2021 of PT Swakarsa Sinar Sentosa to the Environmental Service of East Kutai Regency on January 25, 2022. Report on Management of Hazardous and Toxic Waste for Quarter 1 of 2022 PT Dharma Satya Nusantara – POM 4 to the Environmental Service of East Kutai Regency on 22 April 2022.
- Report on Management of Hazardous and Toxic Waste for Quarter 1 of 2022 PT Dharma Satya Nusantara – POM 4 to the Environmental Service of East Kutai Regency on 22 April 2022.
- Report on the Management of Hazardous and Toxic Waste for Quarter 1 of 2021 PT Dharma Satya Nusantara – POM 4 to the Environmental Service of East Kutai Regency on August 25, 2021
- Report on Management of Hazardous and Toxic Waste for Quarter 2 of 2021 PT Dharma Satya Nusantara – POM 4 to the Environmental Service of East Kutai Regency on August 25, 2021
- Report on the Management of Hazardous and Toxic Waste for Quarter 3 of 2021 PT Dharma Satya Nusantara – POM 4 to the Environmental Service of East Kutai Regency on October 8, 2021
- Report on the Management of Hazardous and Toxic Waste for Quarter 4 of 2021 PT Dharma Satya Nusantara – POM 4 to the Environmental Service of East Kutai Regency on January 21, 2022.
- PT Dharma Satya Nusantara – POM 4 POME Monitoring Report for the 1st Quarter of 2022 to the East Kutai Regency Environmental Service on 22 April 2022.
- PT Dharma Satya Nusantara – POM 4 POME Monitoring Report for the 1st Quarter of 2021 to the East Kutai Regency Environmental Service on August 25, 2021.
- PT Dharma Satya Nusantara – POM 4 POME Monitoring Report for the 2nd Quarter of 2021 to the Environmental Service of East Kutai Regency on August 25, 2021.
- PT Dharma Satya Nusantara – POM 4 POME Monitoring Report for the 3rd Quarter of 2021 to the East Kutai Regency Environmental Service on October 8, 2021.
- PT Dharma Satya Nusantara – POM 4 POME Monitoring Report for the 4th Quarter of 2022 to the East Kutai Regency Environmental Service on January 21, 2022.

UoC also showed the mandatory report submitted related to worker welfare in accordance with its period, here as follows:

- Reporting of Employment Report for PT DSN via online in 2021 on 6 December 2021 and must be reporting back on 06 December 2022.
- Reporting of Employment Report for PT SWA via online in 2021 on 6 December 2021 and must be reporting back on 06 December 2022.

The company has reported several reports on environmental aspects, namely:

- PT SWA's OHS Committee report for semester 2 2021 to the Department of Manpower and Transmigration of East Kalimantan Province on January 21, 2022.
- PT SWA's OHS Committee report for semester 1 2022 to the Department of Manpower and Transmigration of East Kalimantan Province on 26 April 2022.
- PT DSN PKS 4 OHS Committee report for semester 2 2021 to the Manpower and Transmigration Office of East Kalimantan Province on January 21, 2022.

- PT DSN PKS 4 OHS Committee report semester 1 2022 to the Manpower and Transmigration Office of East Kalimantan Province on 26 April 2022.

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

1.1.3

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

UoC had recorded every requested information on a logbook of incoming and outgoing letters. Based on document verification, it was found that during 2021-2022 all incoming letters are requests for funds and the company has responded to the fund request.

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

1.1.4

UoC also showed the record of the socialization regarding the SOP mentioned in 1.1.1 on 24 February 2021 attended by every stakeholder such as: contractor workers, smallholder workers, and communities. In addition, based on the interviews with the villagers, contractor, labor union and gender committee, it is known that they had a good understanding of communication and consultation procedures.

1.1.5

UoC showed the current list of stakeholders which informed the internal and external stakeholders updated on 2 May 2022. The stakeholders include the government agencies, heads of the community, cooperatives, local suppliers, contractors, community organizations, labor union organizations, non-governmental organizations, spiritual agency, media, etc. In the current list of stakeholders, it was also explained the names, agencies/positions, addresses, categories and contact person numbers.

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

Status: Comply

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

1.2.1

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

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

UoC's code of ethics had been socialized to the workers, smallholder workers and contractors, for example:

- PT. Swakarsa Sinarsentosa had carried out socialization on 24 February 2021 attended by 19 contractor workers, communities, and smallholder workers.
- PT. Swakarsa Sinarsentosa had carried out socialization on 6 April 2022 attended by 27 workers.
- PT. Dharma Satya Nusantara POM 4 had carried out socialization on 10 January 2022 attended by 10 workers.

Code of ethics policy has been implemented by the company in all business operations and transactions including recruitment and employment contracts. Code of ethics (anti-corruption and anti-bribery) are stated in every work agreement letter of third parties (contractors) and workers. Based on the interview with workers and contractor workers, it's known that they had a good understanding towards the code of ethics policy.

1.2.2

Unit of certification has a system to monitor compliance and implementation of policies and overall ethical business practices stated in procedure related to employee grievance No. SOP-AGR-054-R03 validated on 30 October 2020. The procedure explained the monitoring mechanism towards the compliance and implementation of ethical business practices applied for workers, contractors, and any parties involved in the company, here as follows:

- DSN Group business ethics must be disseminated to all DSN Group employees
- Every new employee must be ensured to receive the socialization about DSN Group's Business Ethics
- Outreach materials are prepared and compiled by the Human Capital Team
- Socialization can be done face-to-face (in class) or online (for example by Google Meet)
- The Human Capital team will periodically evaluate employees' understanding towards DSN Group Business Ethics, especially regarding the implementation and consequences of violations.
- Complaints or reports of violations of the DSN Group Business Ethics follow the complaint mechanism

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

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

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

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS
2.1

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

2.1.1

The company has list of regulations of 2022 that includes local regulations and national regulation updated annually. List of laws/regulations listed has covers several aspects such as land permit and legality, manpower, occupational health and safety, best management practices and environment. Some examples of regulations compliance that have been done such as:

Land legality

The company shown evidences over its compliance toward the applicable regulation related to the aspects of land legality such as:

- Plantation Business Registration Letter (SPUP) No. 199/Menhutbun-VII/2000 dated March 10, 2000 covering an area of 16,850 hectares and a factory capacity of 60 tons of FFB/hour which was renewed with a Plantation Business Permit in 2012 in the Decree of the East Kutai Regent (No. 188.4.45/038/Eko.1-III/2012 dated March 21, 2012) regarding the Plantation Business Permit covering an area of 16,850 Ha with a processing capacity of 90 tons/hour, located in Muara Wahau sub-district, East Kutai Regency.
- Plantation Business Permit - Processing for POM 4 was obtained from the Regent of East Kutai No. 188.4.45/038/Eko.1-XII/2012 dated 7 December 2012 for factory land with a capacity of 60 tons of FFB/hour

The company has complied with several laws and regulations on environmental aspects, for example:

- The company has a land application permit issued by the East Kutai Regent / Head of the Investment Service and One Stop Integrated Services in accordance with SK number 503/06/DPMPTSP-PPNP/L.A/V/2019 on 28 May 2019 valid for 5 years from the date of stipulation.
- PT. Dharma Satya Nusantara (POM 4) already has a Recommendation for Environmental Management Efforts and Environmental Monitoring Efforts in accordance with the Decree of the Head of the Investment and One Stop Service Office of East Kutai Regency number 503/08/DPMPTSP-PPNP/REK.UKL-UPL/V /2019 concerning Recommendations for Environmental Management Efforts and Environmental Monitoring Efforts for Palm Oil Processing Factory (PKS) activities with a Capacity of 60 Ton FFB/Hour and Palm Kernel Oil (PKO) Mill with a Capacity of 500 Ton Kernel/Day and a Biogas Power Plant (PLTB) Capacity of 2.2 MW and 1,000 M3/hour of Bio Compressed Natural Gas (BIO-CNG) on a land area of ±16.7 Ha by PT Dharma Satya Nusantara Tbk which is located in Benhes Village, Muara Wahau District, East Kutai Regency, East Kalimantan Province.

- PT Swakarsa Sinarsentosa (PT SWA) has conducted an Environmental Impact Assessment (EIA or AMDAL) study in 1998 and had been approved by the Ministry of Agriculture through the approval letter number 21/EA/RKL-RPL/BA/VI/1998 June 8, 1998. The scope of the study was the Plantation and Processing Plant in Muara Wahau, Kutai, East Kalimantan with plantation area 25,000 hectares and mill processing capacity of 60 tons FFB /hour (Mill 1) and capacity of 60 tons FFB/hour (Mill 2). Addendum of EIA in year 2013 has included changes in protocol and plans of environmental management and monitoring (RKL-RPL). The company also has an environmental permit in accordance with the Decree of the Regent of East Kutai No. 662/K.316/2013 dated April 22, 2013 regarding the Environmental Permit for the Addendum to the business activities of plantations and palm oil mills with a factory capacity of 90 Tons FFB/Hour in Muara Wahau Village, Benhes Village, Deabeq Village, and Diaklay Village, Muara Wahau District, East Kutai Regency, East Kalimantan Province.
- The company already has a permit for temporary storage of hazardous and toxic waste for PT Dharma Satya Nusantara POM 4 according to the Decree of the Head of the Plantation and One Stop Service Office of East Kutai Regency No. 503/07/DPMPTSP-PPNP/TPS-LB3/VII/2018 on 9 July 2018 and 5 years since the permit was issued.
- The company already has a permit for temporary storage of hazardous and toxic waste for PT Swakarsa Sinar Sentosa (Estate) according to the Decree of the Regent of East Kutai No. 660/K.151/2018 on 22 March 18 with a validity period of 5 years.

Based on document verification, it is known that the Company already has a water extraction permit based on the Decree of the Minister of Public Works and Public Housing No. 585/KPTS/M/2016 dated 26 October 2016 concerning the Granting of a Surface Water Concession Permit to PT DSN which is valid for 5 years. The validity period of the permit has expired. The company can show a technical recommendation for the exploitation of PT Dharma Satya Nusantara's water resources with number SA 0203-Bws/10/216.10 on 17 November 2021 from the Ministry of Public Works and Public Housing, Directorate General of Water Resources, Kalimantan IV Samarinda. The technical recommendation explains that within 60 calendar days from the issuance of the technical recommendation, the company must apply for a surface water exploitation permit. The company has applied for a water resources concession permit for industrial activities at PT Dharma Satya Nusantara (PKS 4) to the minister of public works and public housing Cq. Directorate General of Water Resources, Ministry of Public Works and Public Housing on November 29, 2021. However, until the ASA 1.1 + 1.2 assessment activity was carried out, the permit had not yet been issued from the Ministry of Public Works and Public Housing. (OFI).

Manpower Aspect:

- UoC has implemented a minimum wage and the fulfillment of overtime wages
- UoC already has and implements a pay scale structure
- There was no illegal labor, underage labor and forced labor systems.
- All workers were permanent workers.

BMP Aspect

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

OHS Aspect

The certification holder has established the structure for guiding committee for occupational health and safety in each management unit and this committee has received approval from the Ministry of Manpower and Transmigration in Kutai Timur Regency, which has provided emergency facilities and etc. Based on observation in Mills and Estates, interviews, and document review, it is known that it is known that operators already have active OHS licenses, such as PKS 4 Engine Room Operator on behalf of Wahyu DS valid until May 2024 and Fajar TM valid until Juni 2022. Th CH also shows the operator licenses for Tractor Estate Jabdan 1 on behalf of Eko P and Estate Long Jenew 2 on behalf of Anas which are valid until August 24, 2025. For medical personnel, the company shows a license for First Aid at workplace officer, dr. Sri Santoso which was ratified by the Director General of Labor Inspection and OHS on 28 December 2017.

2.1.2

Procedure of legal requirement which presented in document SOP-AGR-024-R01, dated 8 September 2014 mentioned that sustainability officer has responsibility to arranged and monitored legal related laws and/or regulation. The procedure mentioned that in order to monitor and update of laws and/or regulations, the sustainability officer required to actively check and make coordination

with Government Agencies or Institutions. The company has list of regulations of 2021 that includes local regulations and national regulation updated annually. From the list of regulations, the auditor concludes that an updated list of regulations is available on the list. Internal audit of regulations compliance is conducted annually as example on 12-13 July 2021 in PT SWA.

At RC assessment, there is OFI on this indicator i.e the company has an opportunity for improvement to create a system for assessing third parties (contractors) regarding compliance with applicable legal regulations. Based on auditor verification in this ASA-1.1 and ASA-1.2 assessment, the company has carried out an evaluation of each contractor to see the performance of the contractors and the compliance of the contractors to the existing regulation. Regarding the evidence of evaluation of legal compliance from contractors collaborating with the company, is explained in more detail in indikator 2.2.2

2.1.3

Procedure of legal boundary stakes monitoring and maintenance is presented in document No. IK-AGR-OLP-33-R01 dated 1 February 2019. Procedure mentioned that maintenance was carried out by officer appointed by Plantation Head. Monitoring the boundaries of the HGU is done every 6 months.

The company shows the HGU stake monitoring document which is carried out every 6 months. The last HGU stake monitoring was carried out for example in March 2022 at Jabdan 1 Estate, Long Jenew 1 Estate and Long Jenew 2 Estate. The report on the inspection and maintenance of the boundary stakes has provided complete information regarding the number of stakes, the state of the stakes, the location of the stakes, the coordinates of the stakes and corrective actions as well as the target time for repairs if there are damaged or missing stakes. In the monitoring report, it is known that all HGU stakes are available.

Based on field observations to several samples of HGU stakes determined by the auditors, namely Jabdan 1 Estate (Stakes No. BPN 201, BPN 188, BPN 177, BPN 175, BPN 164, BPN 157, BPN 145, BPN 143), Long Jenew 1 Estate (Stakes No. BPN 645, BPN 614, BPN 615, BPN 654, BPN 656, BPN 660, BPN 663, BPN 677, BPN 679, BPN 682) and Long Jenew 2 Estate (Stakes No. BPN 437, BPN 428, BPN 427, BPN 426, BPN 425, BPN 422, BPN 390, BPN 388 and BPN 385), it is concluded that all HGU stakes are in place according to their coordinates and are in good condition. Land boundaries with outsiders are clear, such as a large boundary road and trench that borders the HGU area. There is no indication of land use outside the HGU.

Status: Comply

2.2

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

2.2.1

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

- Jabdan 1 Estate: In cooperation with 9 contractors, for instance namely the contractor on behalf of Siti Halimah and Amir A.
- Long Jenew 1 Estate: In cooperation with 21 contractors, for instance namely the contractor on behalf of Harishadi Pradana and Petrus Lie.
- Long Jenew 2 Estate: In cooperation with 26 contractors, for instance namely the contractor on behalf of Fauzi and Agustinus.
- DSN POM 4: In cooperation with 11 contractors, for instance namely Erma Ramayanti.

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

- Work Agreement of Erma Ramayanti (No. 007/DSN/KCP/2022) for truck tank rental in POM 4 dated on 1 January 2022 which is valid for a year (1 January 2022 to 31 December 2022).
- Work Agreement of Amir (No. 013/SWA/JB1/2020) for operational vehicle rental in JB1 Estate dated on 1 April 2020 which is valid for three years (1 April 2020 to 31 March 2023).

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

2.2.2

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

In addition, UoC has carried out an evaluation of each contractor to see the performance of the contractors and the compliance of the contractors to the existing regulation, for example the evaluation of Amir A. period of 2021. There were several important indicators in the evaluation including work quality, punctuality, respond of the grievance, vehicle monthly service, and compliance with regulations and laws (BPJS, provision of minimum wages, implementation of OHS, and work equipments).

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

- Proof of payment of wages period of March 2022 for Petrus Toni Afandi workers in POM 4 on behalf of CDD (initial) who received wages above the minimum wage.
- Proof of payment of wages period of March 2022 for Folina Baqlaq in LJ 1 Estate on behalf of AM (initial) who received wages above the minimum wage.
- BPJS (Social Security Insurance) payments for all contractor workers in POM 4, have been completely fulfilled and the last proof of payment is on 10 May 2022 for period of May 2022.

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

2.2.3

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

Based on the document review and the field observation, it revealed that there were no workers under the age of 18 and the work provided was in accordance with the agreement when the initial worker worked.

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

Status: Comply

2.3

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

2.3.1

Based on document verification, it is known that the company received FFB directly from the main and Partnership estates. The sources of FFB come from:

- Estate JB1 PT Swakarsa Sinar Sentosa (Certified RSPO)
- Estate JB2 PT Swakarsa Sinar Sentosa (Certified RSPO)
- Estate LJ1 PT Swakarsa Sinar Sentosa (Certified RSPO)
- Estate LJ2 PT Swakarsa Sinar Sentosa (Certified RSPO)
- Partnership 1 Min Sun Lekut Cooperative (Non-Certified RSPO) → Full Covered Plasma Cooperative PT Swakarsa Sinar Sentosa.
- Partnership 2 Min Blea Glang Mandiri Cooperatives (Non-Certified RSPO) → Full Covered Plasma Cooperative PT Swakarsa Sinar Sentosa.

- Partnership of 3 Harapan Baru Cooperatives (RSPO Certified) → PT Dharma Satya Nusantara Full Covered Plasma Cooperative.
- Partnership 4 Gerdabang Agri Center Cooperatives (Non-Certified RSPO) → Full Covered Plasma Cooperative PT Dharma Satya Nusantara.
- Partnership 6 Kel'ean Bloom Ketjah Cooperative (RSPO Certified) → Full Covered Plasma Cooperative PT Dharma Satya Nusantara.
- Partnership of 8 Wehea Tlan Sejahtera Palm Oil Cooperatives (Non-Certified RSPO) → PT Dharma Satya Nusantara Full Covered Plasma Cooperative.
- Partnership 10 A, 10B, 10 C Jengea Bong Pet Kuq Cooperative (Non-Certified RSPO) → PT Dharma Satya Nusantara Full Covered Plasma Cooperative.
- Kemitraan 11 Usaha Baru Cooperative (Non-Certified RSPO) → Koperasi Plasma Full Covered PT Dharma Satya Nusantara.
- External Parties (Village Karya Bakti Cooperative, Village Wanasari Cooperative, Village Muara Wahau Cooperative, Village Diak Lay Cooperative, and PT Roni Putra Abadi) → Non-RSPO Certified and from Independent Smallholders Cooperatives.

Companies can show geolocation and land legality information from members of the FFB supply partnership cooperative, for example as follows:

- Min Sun Lekut Cooperative with geo location 1°6'15,869" N and 116°46'44,663" E and land ownership certificate in the form of SHM.
- Bea Glang Mandiri Cooperative with geo location 1°4'37,398" N and 116°48'23,000" E and land ownership in the form of SHM.
- Wehea Tlan Sejahtera Sawit Cooperative geo-location 1°14'42.122" N and 116°40'56,356" E and land ownership in the form of SHM.
- Cooperative Gerdabang Agri Center geo location 1°4'37,398" N and 116°48'10,642" E and land ownership in the form of SHM.
- Cooperative Jengea Bong Pet Kuq geo location 1°12'31.140" N and 116°41'24,781" E and land ownership in the form of SHM.
- Karya Bakti Village Cooperative geo location X: 116.908616667 and Y: 0.90273333333 and land ownership in the form of SHM and SKT.
- Wanasari Cooperative geo location X: 116.886633 and Y: 1.043933 and land ownership in the form of SHM and SKT.
- PT Roni Putra Abadi geo location X: 116.986347 and Y: 0.942810 and land ownership in the form of SHM.

2.3.2

Based on the results of document verification, it is known that the company receives FFB directly and there is no indirect FFB. FFB received directly from areas that have been RSPO Certified and Non-RSPO Certified.

Status: Comply

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

3.1

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

3.1.1

The certificate holder has shown the Projection, Work Plan and Budget for 2022 - 2026. The information in the document consists of the Estate's operational activities and budget plans (land clearing, planting, maintenance and harvesting), as well as POM 4 operations (FFB Process, OER, KER, CPO & PK Produced and FFA), sales projections, CSR programs, and environmental programs. For example, projections for 2023, processed FFB 334,957 tons, CPO 78,052 tons (23.3 %), kernels 14,232 tons (4.25 %), FFA 2.6%, plantation budget 289.30 billion, POM 4 budget 788.83 billion, income 1,615.37 billion, net balance 423.95 billion. The long-term plan includes main estates and plasma.

3.1.2

The company holding the certificate has a replanting program with a fall period of 2020 – 2026, for the oldest planting year 1996. Meanwhile, the planting plan starts in 2023. Based on field observations and interviews, it is known that the uprooted has not been carried out. The management representative explained that the yield/ha is still high, i.e. an average of 26.8 tons/ha in 2020 and 24.5 tons/ha in 2021. This has become management's consideration for delaying the replanting implementation.

3.1.3

The representative of the certificate holder explained that the evaluation related to the Business Plan has been carried out every 3 months. He showed the document Minutes of Meeting Performance Review Quarter 1 2022 which was held on 21 - 22 April 2022 virtually, which was attended by Regional Heads, Plantation Heads, Estate Heads, Mill Heads, Replanting Team, Engineering, Sustainability, Project, and CSR. The document discusses issues in each PT/unit, PIC, related parties, follow-up, and types of discussion. Some of the issues discussed included company costs, plant performance, losses, improving the quality and quantity of FFB, peak season, project costs, and replanting.

Status: Comply

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

3.2.1
The management unit has developed and implemented an action plan for continuous improvement and it is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification, such as:

- The company no longer uses pesticides with the active ingredient paraquat.
- The company has implemented biological pest control in this case by using host plants and owls to reduce the use of pesticides, especially insecticides and rodenticides.
- Management and monitoring of fires in company border areas that benefit the community.
- The use of renewable fuels and the use of fertilizers and pesticides are in accordance with the recommendations to reduce the use of fossil fuels.

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

- Waste management and monitoring through WWTP Management, testing the quality of the effluent and reporting it to the Environmental Service of East Kutai Regency.
- Have a Biogas Plant to generate electricity used for Mill operations.
- Air quality management and monitoring through road maintenance, air quality testing and reporting to the East Kutai Regency Environmental Service.
- Management and monitoring of groundwater through Testing the quality of groundwater and reporting it to the Environment of East Kutai Regency.
- Hazardous waste management through Hazardous and Toxic Waste Storage and Hazardous and Toxic Waste management and monitoring.
- Greenhouse Gas (GHG) Management. Implement a zero burning policy, utilization of EFB, shells and fiber as renewable energy, regular engine maintenance, and regular emission quality tests.

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

- Mechanization of FFB transportation in LJ 2 using a scissorlift installed in a grabber, since March 2022 with the aim of time and human resource efficiency in FFB delivery.
- Mechanization in fertilizer input to emdek at Estate LJ 1, since 2020, with the aim of time and human resource efficiency.

3.2.2
The company already has an annual report document using the RSPO metric template format which was provided to the auditor team at the time of the assessment. The summary in the report, for example, is as follows:

- Name of RSPO Member: PT Dharma Satya Nusantara
- RSPO Membership Number: 1-0135-12-000-00
- Name of Certified Audit: PT Dharma Satya Nusantara (POM 4)
- Name of Certification Body: PT Mutu Agung Lestari
- RSPO Palm Trace ID Number: RSPO_PO1000002088
- Number of Mill: 1
- Number of Certified Estate: 3
- HCV Area: 325 Ha.

The company shows the RSPO Metric Template on the last day of the audit. Based on the Guidance For the 2018 RSPO Principles

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

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The certification holder representatives has shown that operating procedures, stipulated in Work Instructions (WI), were appropriately documented, consistently implemented, and monitored. The Work Instructions have covered all Estate operations starting from land clearing, maintenance, pest handling, harvesting, transportation of FFB, replanting, delivery to POM. Meanwhile the Work Instructions of Mill covering the aspects of FFB receiving, grading, processing, refinery, dispatch, supply chain, and quality/laboratory. In each Work Instructions has been covered the OHS and environmental aspect. However, there were also specific document set about OHS and environmental in the Work Instructions of Safety and Environmental Management, as well as Hazard Identification Risk Assessment and Control (HIRAC).

The procedure that is owned by the Unit of Certification has covered all the main process activities from land clearing up to transporting FFB and for POM starting from receiving fruit to dispatch CPO. In the procedure also includes aspects of OHS and the environment. The procedure is available on audit site (Estate and mill office) and are written in a language (Bahasa) that is easily understandable for workers.

3.3.2

The certificate holder unit has a mechanism to check the implementation of procedures, which are contained in SOP - AGR - 040 - R03 regarding Management System Audit Revision 03 which was approved by the Executive Director on October 1, 2015. This procedure is established to ensure that the management system audit is carried out effectively and efficiently. . audits are carried out periodically, i.e. every 3 months, every 6 months, and annually.

3.3.3

The certificate holder shows several documents recording the implementation of the SOP implementation, including:

- Internal Audit Sustainability Report POM 4 semester 2 2021, carried out 12-13 July 2021, with 4 non-conformities and 4 OFI results. Verification was carry out again in January 2022, but the audit report is still in process.
- Report on the results of POM 4 2022 Performance Assessment, which will be held on 25 - 26 April 2022 with a score of 78.9.
- Independent Auditor's report number 00021/2.1005/AU.1/01/0302-1/1/II/2022 with an opinion on the consolidated financial statements as of December 31, 2021, presenting fairly.
- Customer feedback on customer satisfaction for the categories of services, communication, attitude, product delivery, product quantity, and product quality. The company got a total score of 4.5 with a rating range of 1 - 5.

Status: Comply

3.4

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

3.4.1

The company has conducted an independent and participatory environmental and social impact assessment by involving the stakeholders listed in several documents, namely:

Environmental Aspect

- PT. Dharma Satya Nusantara (POM 4): The company already has a revised UKL-UPL document for Palm Oil Processing Factory 4 (PKS 4) with a Capacity of 60 Tons FFB/Hour and Palm Kernel Oil (PKO) Factory with a Capacity of 500 Tons Kernel/Day and a Biogas Power Plant (PLTB) Capacity of 2.2 MW and 1000 M3/hour Bio Compressed Natural Gas (BIO-CNG) PT Dharma Satya Nusantara Tbk in 2019.
- PT Swakarsa Sinarsentosa (PT SWA) has conducted Environmental Impact Assessment (EIA or AMDAL) study in 1998 and had been approved by the Ministry of Agriculture through the approval letter number 21/EA/RKL-RPL/BA/VI/1998 June 8, 1998. The scope of the study was the Plantation and Processing Plant in Muara Wahau, Kutai, East Kalimantan with plantation area 25,000

hectares and mill processing capacity of 60 ton FFB /hour (Mill 1) and capacity of 60 ton FFB/hour (Mill 2). Addendum of EIA in year 2013 has included changes in protocol and plans of environmental management and monitoring (RKL-RPL) into the following environmental impacts: 1) the quality of surface water, 2) ambient air quality, 3) attitudes and negative perceptions of the community, 4) employment opportunities, 5) business opportunities, 6) attitude and positive perception of society, 7) degradation of soil fertility, 8) degradation of biodiversity, 9) public safety due to traffic, 10) load of sediment in the water body, 11) disruption of runoff, 12) reduction of environmental sanitation quality

Social Aspect

PT SWA has document of Social Impact Assessment (SIA) that made by the Certificate Holder. SIA has completely carried out on December 2011 engaged Daemeter Consulting as a consultant. These documents was explained of negative and positive impact of plantation (PT. Swakarsa Sinarsentosa) and mill operation to social aspect and the recommendation for negative impact reduction and increasing of positive impact. Also completed with the minutes meeting of consultation process with community surround. The evidence was consisting of Attendant List of village member on Focus Group Discussion as phase of data gathering for Social Impact Assessment Report.

The management of social impacts is carried out through the Community Development program which is prepared by involving community participation every year, thereby providing space and opportunities for the community to involve themselves and increase capacity in village development planning. This is in accordance with the results of an interview with the Head of the East Kutai Regency Plantation Service that PT SWA always involves the community and related agencies in planning its CSR activities so that there is no overlapping of programs with government agencies and community empowerment programs are more targeted.

There are 4 groups of affected recipients, namely indigenous people, transmigration communities, migrant communities, employees and local governments. Impact assessment is carried out on the types and levels (population relocation, land clearing and acquisition, occupational accident and health risks, community perceptions, public health, employment opportunities, marginalization of minor groups, social conflicts, income generation, capacity building of human resources, strengthening of community organizations, changes in habits and the environment, development of plasma plantations.

Based on document verification, it is known that the social and environmental impact assessment has been carried out independently and participatively by involving affected stakeholders, including impact assessments from smallholder schemes.

The results of field observations during the audit activity show that all of the company's operational activities have been included in the environmental documents owned by the company.

Based on interviews with Muara Wahau Village and Dabek Village, it is known that the social impacts of the company's existence include partnerships with business actors to provide business opportunities to the community, CSR, job opportunities, etc. These social impacts have also been identified in the SIA Document, Environmental Document, as well as the company's social impact management plan.

Based on document verification, it is known that the scope of the social impact assessment has covered all villages, farmers, and has involved internal workers.

3.4.2

The company already has an environmental and social management and monitoring plan, namely:

Environmental Aspect

POM 4 dan PKO

- Decreased air quality
- Decrease in water quality as a result of Land Application activities
- Noise Enhancement
- Increasing the amount of hazardous waste
- An increase in the amount of solid waste
- Increasing the amount of domestic waste

PT Swakarsa Sinarsentosa

The environmental management and monitoring plan is in accordance with the environmental documents held, such as:

- The quality of surface water
- Ambient air quality
- Attitudes and negative perceptions of the community
- Employment opportunities
- Business opportunities
- Attitude and positive perception of society
- Degradation of soil fertility
- Degradation of biodiversity
- Public safety due to traffic
- Load of sediment in the water body
- Disruption of runoff
- Reduction of environmental sanitation quality.

Based on document verification and the results of field visits, it is known that the environmental management and monitoring plan has covered all of the company's operational activities.

Social Aspect

The company already has a Social Management Plan (RKS) and Social Monitoring Plan (RPS) for the 2022 period which are prepared based on the results of monitoring carried out by the company and will then be consulted with stakeholders such as surrounding village communities, plasma farmers, and employees. This is evidenced by the company being able to show the minutes of stakeholder consultation conducted on December 28, 2021. The management plans and social monitoring are as follows:

- Accident and health risks
- Public perception
- Public health
- Jobs
- Minor group marginalization
- Social conflict
- Increased revenue
- HR capacity building
- Organizational strengthening
- Changes in habits and environment
- Plasma plantation development.

Based on document verification and interviews with surrounding villages and employees, it is known that the social management and monitoring plan has covered all of the company's operational activities. This is evidenced by the SIA management plan which contains the social impacts of the company's operations on stakeholders such as increasing community income, strengthening plasma cooperative organizations/institutions and social conflicts that have been included in the social management and monitoring plan.

3.4.3

The Company has implemented environmental and social management and monitoring plans, namely:

Environmental Aspect

PT Swakarsa Sinarsentosa

The company has implemented an environmental management and monitoring plan for the 1st and 2nd semesters of 2021. The environmental management and monitoring plan is in accordance with the environmental documents it has. The results of the verification of the implementation of the environmental management and monitoring plan for semesters 1 and 2 of 2021 are in accordance with the directions of the environmental documents owned. In general, the results of environmental management and monitoring are in accordance with the provisions. The company has also conducted evaluations such as trend evaluation, critical level evaluation, and compliance evaluation. Based on the results of interviews with the surrounding community, information was also obtained that there was no environmental pollution by the company. In addition, the results of interviews with the East Kutai Regency Environmental Service also explained that the company had carried out environmental management and monitoring and reported the results of the implementation of environmental management and monitoring to the Environment Agency.

POM 4

The company has implemented an environmental management and monitoring plan for the 1st and 2nd semesters of 2021. The environmental management and monitoring plan is in accordance with the environmental documents it has. The results of the verification of the implementation of the environmental management and monitoring plan for semesters 1 and 2 of 2021 are in accordance with the directions of the environmental documents owned. In general, the results of environmental management and monitoring are in accordance with the provisions. The company has also conducted evaluations such as trend evaluation, critical level evaluation, and compliance evaluation. Based on the results of interviews with the surrounding community, information was also obtained that there was no environmental pollution by the company. In addition, the results of the interview with the Environmental Service of East Kutai Regency also explained that the company had carried out environmental management and monitoring and reported the results of the implementation of environmental management and monitoring to the Environmental Service.

In general, the results of environmental monitoring carried out by the company are in accordance with its environmental management and monitoring plan. There is a test result for the Telen Hilir river (TSS parameters) which is higher than the Telen Hulu river. This is because when environmental monitoring in September 2021 enters the rainy season or high rainfall, causing the soil to be degraded into dissolved particles carried into the river flow.

Social Aspect

The company has implemented the SIA management and monitoring plan for the 2021 period. The plans that have been implemented have been in accordance with the SIA management and monitoring plan. Some examples of the implementation of the AIS management and monitoring plan are as follows:

- Land clearing and road acquisition. The impact of land clearing and road acquisition is often considered irrelevant because the company has not cleared new land and carried out land acquisition.
- Risk of occupational accidents and health by ensuring the use of PPE is used by employees.
- Community Perception. Indicators of success are the existence of joint activities between the community and the company and the absence of anti-palm oil and anti-company demonstrations.
- Public health. The company has carried out treatment for the community periodically through doctor visits to the village as well as opening access for people who seek treatment at the company clinic.
- Marginalization of minor groups. The company has prioritized the assisted village communities (local/indigenous residents) of the company in recruiting workers.

The company has also reviewed the SIA management and monitoring plan which was carried out together with the surrounding community and workers as evidenced by showing the minutes of the SIA management and monitoring plan review along with the attendance list of stakeholders involved such as the Head of Muara Wahau Sub-district, Plasma Cooperatives, Independent Farmers around the company, Contractors, Employees, Benhas Village, Dabeq Village, Diaklay Village, Muara Wahau Village, Miao Baru Village, and Nehas Liah Bing Village. The review was carried out for the period December 28, 2021.

Status: Comply

3.5
A system for managing human resources is in place.
3.5.1

UoC had procedures related to recruitment, appraisal, promotion, remuneration, and termination of employment which are generally described in the Company Regulation period of 2022 to 2024 written in *Bahasa*. In general, these procedures has been in accordance with the existing manpower regulation, describe as follows:

- Recruitment of workers is based on the company's needs.
- The minimum age of workers is 18 years old.
- The workers who have been accepted will through three months of probation.
- Promotion of workers is based on needs, period of work, expertise, and assessment of workers for the last 6 months.
- The company is authorized to carry out the placement, transfer, and promotion of workers by applicable regulations.
- Termination happened when a worker at the maximum age of worker which is 55 years old.
- Termination can also be happened by several causes, for example: the worker passed away, the worker didn't meet the requirements during the probation, serious violation, arrested by the authorities, etc.

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

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

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

3.5.2

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

- Recruitment document in accordance with the recruitment requirements such as employment request form, application letter, statement of police report, identity card (KTP), family identity card (KK), the result of written test, the result of interview test, employee candidate statement letter, and work agreement letter. For example, a worker on behalf of AR (initial) who started working with three months of probation on 1 September 2021 and had been promoted as a permanent worker on 1 December 2021.
- Promotion documents such as management decree for worker's promotion. For example, a worker on behalf of ST (initial) who had a promotion based on worker's appraisal, from SKU worker to 3 down grade worker in harvesting clerk on 25 October 2021.
- Termination document such as the management decree of employment's termination on behalf of FM (initial) due to the maximum age limit for workers. UoC also showed other supporting documents such as the management decree of employment's termination, worker's personal identity card, calculation of termination payments, and the proof of its payment in accordance with the applicable laws.

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

Status: Comply

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

3.6.1

The certificate holder has carried out a risk assessment to identify Occupational Health & Safety issues in all operations. For 2022, it has been ratified in early January 2022 for PT DSN POM 4 and PT SWA. The document contains identification of each type of activity, source of hazard, risk/impact, risk assessment, operational control, type of control, and risk evaluation. This assessment covers all hazards and risks in the plantation, such as land clearing, manual plant care, plant pests and diseases, harvesting and transportation, mechanical harvesting, FFB transport by grabber, manual fertilization, mechanical fertilization, pesticide application, land application, etc. Based on field observations and interviews with pesticide applicators, it is known that officers have understood the potential work risks and how to minimize these risks. The certification unit also shows a HIRAC document for the Milling unit which explains the results of hazard identification and its control in FFB weighing operations, loading ramp stations, sterilizer station operations, thresher stations, press station operations, boiler station operations and so on.

The company demonstrates its mitigation plans and procedures through the OHS Policy document, issued December 2010 by the CEO. The policy explains, among others, that the company's operational activities must comply with laws and regulations, actively monitor and improve the implementation of management systems, and cultivate a culture of continuous improvement within the company.

In addition, the certification unit has also established procedures for mitigating OHS problems in all operations, including SOPs about

risk identification, appraisal and risk control on risk assessment matrix, safety induction/orientation, OSH inspection schedule, preliminary report on accident and nonconformity, investigation. of accident and incidence reports, work permits, etc.

3.6.2

Monitoring the effectiveness of the OHS plan in dealing with OHS risks is carried out periodically through monthly OSH Committee meetings, which discuss OHS issues in the certification unit. Following are some recordings of activities monitoring the effectiveness of the OHS plan through monthly OSH Committee meetings:

- Mom POM 4 OHS Committee for the period March 2022 on March 9, 2022 with discussions covering work accident analysis, safety patrol results, and environmental hygiene.
- Minutes of the OHS Committee meeting for the period March 2022, April 13, 2022 with discussion of work accidents, and evaluation of audit records, procurement of eyewash and trash bins.

Referring to Government Regulation no. 50 of 2012, Article 10 related to worker competence and authority related to OHS in POM and Estate operations, it is known that POM 4 already has Operators with OHS licenses, including 6 Class 1 Boiler Operators, 5 Wheel Loader Operators, 4 Diesel Motor Operators, 4 Sterilizer Operators, and 1 Electrician. For the plantation, it has 22 active lifting and transport aircraft operators and an extension for 1 operator license, for 27 heavy lifting equipment. The CH has carried out periodic inspections of factory machinery to ensure OHS risks too.

Based on field observation, it is known that operators already have active OHS licenses. Such as POM 4 Engine Room Operator on behalf of Wahyu DS that the license valid until May 2024. Then, Jabdan Estate Farm Tractor Operator on behalf of Eko P, Long Jenew 1 Farm Operator Tractor on behalf of Anas, which booth licences are valid until August 24, 2025.

Based on an interview with the Manpower Office of Kotawaringin Timur Regency, it is known that work accidents have been reported regularly in the quarterly reports of the OSH Supervisory Committee and there have been no cases of death.

The company has conducted a vibration test in the boiler panel and engine room carried out by a competent 3rd party on this matter. The results of the study of the Report and Sampling analysis document show that the test results in the boiler panel and engine room are still within the permissible limits.

Status: Comply

3.7

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

3.7.1 and 3.7.2

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

- Training of fire-fighting, first aid simulation, children care, and emergency for daycare officer.
- Training of ISPO, RSPO, SCSS, and ISCC basic for security officer.
- Training of supply chain and first aid simulation for weighbridge operator.

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

- Training of controlling Ganoderma disease in palm oil on 25 January 2022 which was attended by 15 participants consisting of contractor workers and smallholder workers.
- Training of palm oil and palm kernel oil process on 14 August 2021 which was attended by 11 workers in mill

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

3.7.3

The unit of certification showed socialization about the supply chain to employees which was last conducted on 1 July 2021. The minutes explained the procedures for managing certified and non-certified products including the responsibilities for each of the personnel who handle products.

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

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 and 3.8.2

Based on document verification, the Mill implements the MB Module, which is received both FFB from certified and uncertified sources. Verification of Mass Balance record, the Mill has been recorded well the separation of FFB and products (CPO and PK) from certified and uncertified sources.

3.8.3

Estimated certified product recorded in the last assessment report. The estimates of certified production for the next license period describe at ASA-1.1 + ASA-1.2 report (basic info 1.8.3), in reasonable amount taking into account the last year's production. The data are shown in the following table:

Products	Last Year Projected Certified Volume + Ext Volume (1 June 2020 – 28 May 2022) (MT)	Last Year Actual Certified Volume (May 2020 to April 2022) (MT)
FFB Certified (MT)	445,978	417,284.03
CSPO (MT)	94,723	93,131.28
CSPK (MT)	17,283	17,033.93

3.8.4

The Mill has registered as RSPO member under PT DHARMA SATYA NUSANTARA (No. 1-0135-12-000-00) and also has been registered in IT platform palm trace RSPO <https://palmtrace.rspo.org/web/rspo/member-directory> which information as follows:

- Member Name: PT DHARMA SATYA NUSANTARA (PKS4)
- License ID: CB101666
- Core Product: Palm Oil
- Member ID: RSPO_PO1000002088
- Type of Business: Oil Mill
- Supply chain model: Mass Balance

3.8.5

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

Based on interviews in POM 4 note that the weighbridge operators understands the supply chain management system. It also known that training and refreshment (awareness) of supply chain management system were carried out annually.

3.8.6

The procedure for internal audit for SCCS mentioned in Work Instruction of Traceability of CPO, PK and PKO in MB Model (No. IK-AGR-MS-04-R12 dated 1 March 2021). Based on that procedure internal audit carry out minimum one times a year. Based on document review, the company show the record evidence regarding internal audit of RSPO SCCS that conducted on 12-13 July 2021. Based on result of internal audit, there is no non conformity SSCS indicators and complied with RSPO Supply Chain requirements for mills and the RSPO Rules on Market Communications and Claims.

Management Review of RSPO SCCS implementation conducted on 28-29 July 2021. The management review discussion has covered the input from internal audit result, correction and corrective action, process performance and product compliance, follow up of previous management review, and recommendation for improvement.

3.8.7

The mill has verified and documented the volumes of certified and non-certified FFBs received. Certified and non-certified FFB received period of 24 months before audit which is May 2020 – April 2022:

Month	FFB (ton)		Total
	Certified	Non-Certified	
May 2020	19,877.50	8,297.35	28,174.85
June 2020	17,889.61	7,817.14	25,706.75
July 2020	12,975.01	6,848.43	19,823.44
August 2020	9,997.61	5,742.77	15,740.38
Sept 2020	14,530.60	7,014.76	21,545.36
Oct 2020	24,011.61	9,144.28	33,155.89
Nov 2020	25,560.99	9,090.71	34,651.70
Dec 2020	22,088.08	9,183.82	31,271.90
Jan 2021	16,606.44	5,944.16	22,550.60
Feb 2021	16,153.50	6,496.95	22,650.45
Mar 2021	17,593.13	8,076.79	25,669.92
Apr 2021	17,958.92	9,048.99	27,007.91
May 2021	14,894.13	7,786.03	22,680.16
June 2021	13,116.97	7,455.65	20,572.62
July 2021	14,292.34	7,881.24	22,173.58
August 2021	19,414.67	9,575.35	28,990.02
Sept 2021	22,506.62	9,362.83	31,869.45
Oct 2021	23,779.54	8,479.94	32,259.48
Nov 2021	21,575.59	8,995.96	30,571.55
Dec 2021	19,793.49	9,486.11	29,279.60
Jan 2022	18,319.75	8,196.61	26,516.36
Feb 2022	6,561.82	3,465.61	10,027.43
Mar 2022	15,550.90	8,696.47	24,247.37
Apr 2022	12,235.21	9,829.67	22,064.88
Total	417,284.03	191,917.60	609,201.63

Estimated certified product recorded in the last assessment report (RC). Actual certified produced has been verified during this assessment and not exceed the estimate. The data are shown in the following table:

Products	Last Year Projected Certified Volume + Ext Volume (1 June 2020 – 28 May 2022) (MT)	Last Year Actual Certified Volume (May 2020 to April 2022) (MT)
FFB Certified (MT)	445,978	417,284.03
CSPO (MT)	94,723	93,131.28
CSPK (MT)	17,283	17,033.93

According to the data during the certification period, there still not any overproduction yet.

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

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

3.8.8

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

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

Documents verifications and interview with management units obtained information if in last 24 months before audit (May 2020 – April 2022) there is no CSPO that sold as certified products. CSPO products sold as other scheme (ISCC). All CSPK produces sold to PT Dharma Satya Nusantara (Kernel Crushing Plant). PT Dharma Satya Nusantara (Kernel Crushing Plant) has been registered and met the requirement for reporting supply chain through RSPO IT Platform, describes below:

- Member name: PT Dharma Satya Nusantara (Kernel Crushing plant)
- Member ID: RSPO_PO1000002087

Documents verifications and field observation in POM 4 it's known the CSPK that delivered to PT Dharma Satya Nusantara (Kernel Crushing plant) using conveyor. Every CSPK production will be sent directly to KCP via conveyor and measured through a baskulator. Reconciliation is carried out periodically related to the sending and receiving. Based on documents verifications its known if claim related CSPK products is no longer than 3 months. For example, for shipping announcements with transaction.

3.8.9

The unit of certification has legal ownership of CPO and PK and did not outsource its milling activities. The CSPK was processed in PT Dharma Satya Nusantara (Kernel Crushing Plant) located in one complex with POM 4. Transportation of CPO are outsourced to the third parties, as shows through Work Agreement with 5 transporters. However, based on the CPO sales data shown, it is known that since POM 4 received the RSPO license, the company has never sold RSPO certified CPO.

The contractors have been bound in a work agreement, for example work agreement with Filipus Ing No. 003/DSN/PKS4/2022 dated 27 December 2021 and valid thru 31 December 2022. On article 4 states that it is willing to provide access to an accredited certification body appointed by the first party to its operations and systems, along with all necessary information including the commitment of the second party in carrying out obligations under that agreement.

3.8.10 and 3.8.11

The Mill has the record of details of the contractor, covers the contractor company profile, address, contact person, email and phone number, contract agreement and period, and list of vehicles. There was no new contractor from the previous assessment. The list of contractors of CPO transporter are:

1. Cooperative of Min Sun Lekut
2. Filipus Ing
3. Gregorius Geleng
4. Hermanius Yoki
5. Theodorus Telea

3.8.12

The company has had the up-to-date record and report that are kept in mill office, complete, accurate and up-to-date. All the record can be accessed by the auditor, such as record of certified product shipping, sales contract, delivery order/invoice, production report

and product sales. Based on document verification on supply chain procedure, retention time for all records and report regarding to supply chain are kept for 2 years.

For instance record of all certified palm oil/palm kernel oil volumes purchased (input) and claimed (output) for period of 24-months before audit (May 2020 – April 2022):

CSPO

Month	CPO (ton)		Total
	Certified	Non-Certified	
May 2020 - Apr 2022	93,131.28	42,963.18	136,094.46

Month	CSPO Despatch (ton)			Total
	RSPO	Other Scheme	Non-Certified	
May 2020 - Apr 2022	-	69,000.00	17,621.00	86,621.00

CSPK

Month	PK (ton)		Total
	Certified	Non-Certified	
May 2020 - Apr 2022	17,033.93	7,921.91	24,955.84

Month	CSPK Despatch (ton)			Total
	RSPO	Other Scheme	Non-Certified	
May 2020 - Apr 2022	13,580.94	-	-	13,580.94

3.8.13 and 3.8.14

The conversion rate of production of CPO (OER) and PK (KER) were based on actual daily, monthly and yearly production. The extraction rate follows the actual data for a 24-month period for May 2020 until April 2022 i.e OER 22.34% and KER 4.10%. Periodically update of extraction is actual extraction.

3.8.15

SCSS module used in POM 4 is Mass Balance (MB), because the mill receives FFB from the estate RSPO certified and from smallholders and third party that non-certified RSPO.

3.8.16

RSPO IT Platform member registration number for POM 4 is RSPO_PO1000002088. The Mill carry out shipping announcement in the RSPO IT platform when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch. For example:

- Certified PK sold to PT Dharma Satya Nusantara Tbk (Kernel Crushing Plant) dated 31 July 2021 for 576.24 ton and transaction creates in IT Palm Trace dated 18 August 2021.
- Certified PK sold to PT Dharma Satya Nusantara Tbk (Kernel Crushing Plant) dated 30 April 2022 for 521.56 ton and transaction creates in IT Palm Trace dated 13 May 2022.

Removing Stock

For the certified PK, the company sold all the CSPK as RSPO Certified product. However, for the CSPO that sold as other scheme or as conventional, the company has credit allocated (Book and claim) the stock of CSPO from the palm trace, as example credit

allocation of CSPO dated 23 March 2022 for 1,650 ton (transaction ID: ST-TR-72d35dcd-73cc) and removing stock of CSPO dated 10 January 2022 for 4,000 ton (transaction ID: ST-TR-de65f1e2-a235).

3.8.17

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

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

UoC showed their commitment due to respecting human rights stated in the DSN Group quality guideline document No PDM-AGR-R06 validated on 01 January 2020 approved by the Managing Director. In addition, it's also stated in UoC's Internal Memo No. 0017/HCO/IM/III/2016 related to acknowledgement declaration of human rights. Both explained that DSN Group committed to respect and protect human rights in order to create security for all workers including not to discriminate, give freedom in beliefs, respect and uphold human rights.

UoC's commitment in respecting the human rights has been well implemented proved by the absence of issues and incidents of human rights violations that occurred in the operational areas for mill and 3 estates. Based on the interview with workers in estates (harvesters, pesticide sprayers, and maintenance workers), workers in mill (mill operators and warehouse workers), they stated that there were no incidents or issues of human rights violations occurring in the operational area of the certification unit.

4.1.2

Based on the interviews with the surrounding communities (Muara Wahau Village and Dabek Village), occupants, and workers, it revealed that up until ASA-2 assessment, if there was any conflicts or disputes with the company, the resolution action taken was deliberation without involving any violence's or mercenaries. Resolution of conflicts / problems using these deliberations has been quite effective and during the past year there have never been any conflicts / problems in UoC's work area.

Status: Comply

4.2

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

4.2.1

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

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

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

4.2.2 and 4.2.3

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

handling grievance, is stated as follows:

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

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

Based on interviews with workers and external or internal stakeholders, it's known that they have understood the person responsible and the grievance mechanism in which the complainant's identity is protected. Based on the interview with both internal and external stakeholders, they informed that there were no complaints or grievances against the UoC. Based on the document review of external grievance, there was a grievance from *Pemuda* Muara Wahau on 2 February 2021 related to the community job opportunities which took too long. UoC then responded to the grievance by socialized UoC's recruitment mechanism, announce the job vacancy to the village heads, and called the job applicants to do the psychological test. UoC also informed the Village Head of Muara Wahau on 16 February 2021 related to the grievance and UoC's process on responding the grievance.

Based on the documents review of the worker's grievance logbook period of 2021 to 2022, it is known that the complaints received by the company are related to facilities. UoC then showed the compliance of these complaints. Based on the interviews with government agencies, surrounding communities, gender committees, labor unions and workers, it's known that there were no further complaints against the unit of certification.

4.2.4

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

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

Status: Comply

4.3

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

4.3.1

The 2021 CSR program compiled by the company was carried out based on the results of routine social visits by the company, for example on 20 July 2021 in Benhas Village and 27 September 2021 in Nehas Liang Bing Village. The following are CSR programs for the period 2021-2022 PT Dharma Satya Nusantara including PKS 4, for example:

Field of education

- Teacher Honorary Assistance in Villages around the company
- Child protection activities in collaboration with the Women's and Child Protection Empowerment Service.

Community Economy

- Cooperation with the community for the transportation of FFB, CPO, Kernel, EFB, and building construction.
- Assistance and training for independent farmers.
- Assistance and management of legality and licensing of Partner Cooperatives.

Cultural Preservation

- Participation and support for the 6th annual Erau activities of the Wehea Dayak Tribe Village
- Management and maintenance of the Wehea site in the Puhus area.

Residential Environment

- Assistance for fire control and extinguishing facilities and infrastructure to villages around the company.

- Hotspot monitoring and regular patrols.

Infrastructure

- Maintenance of village drainage
- Assistance with heavy equipment for repairing farm roads
- Assistance in repairing bridges and culverts.

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

- Fund assistance for the construction of the Nehas Liah Bing Village Church on March 19, 2022.
- Participation in the Village Development Planning Deliberation activity on February 4, 2022 in Muara Wahau Village.
- Child protection training and socialization conducted on 9 February 2022 in Deabeq Village.
- Honorary Teacher Assistance to Honorary Teacher on January 11, 2022.
- Mentoring and education for children in Long Sep Village on March 11, 2022.
- Learning House activity in Nehas Liah Bing Village which was conducted on 10 February 2022.

Based on the results of interviews with Muara Wahau Village and Dabek Village, it is known that the company has realized CSR very well. The surrounding community felt helped by the existence of the company because of the assistance from the company such as the opportunity to try to become a contractor, work in the company, educate children and repair village access roads.

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

For the total cultivated area covering 16,850 ha has been owned legally by PT SWA through HGU Certificate No. 1 year of 1998, issued based on BPN Decree No. 135/HGU/BPN/1997 dated 28 October 1997, valid for 35 years. All document is kept in head office (Jakarta) and copies are available in unit. POM 4 (under PT DSN) was established in the land of PT SWA which has a cooperation agreement between PT DSN and PT SWA No. 437/SWA/Dir-Arf/JKT/V/14 on the Granting of Right and Authority to Use Land and Establish the Building of POM and Other Facilities in Muara Wahau Village, Muara Wahau Sub-district, Kutai Timur Regency. Both Mill and Estates has owned the plantation permit issued by Kutai Timur Regent, for the plantation area of 16,850 ha (Decree No. 188.4.45/038/Eko.1-III/2012 dated 21 March 2012) and Mill capacity of 60-ton FFB/hour (Decree No. 188.4.45/038/Eko.1-XII/2012 dated 7 December 2012).

From the total land use title (HGU Certificate) covering 16,850 Ha, the scope of certification under POM 4 is **11,729 ha** and the rest of the area covering 5,121 Ha under the scope of certification POM 1.

4.4.2; 4.4.3; 4.4.4; 4.4.5 and 4.4.6

The unit of certifications land is not obtained from land acquisition from individual rights, customary rights, or traditional rights. In the Decree of the HGU, it was explained that the entire area of PT SWA originated from the forest area which was released through Decree of Forestry Ministry (No. 174/Menhut-VII/1996 dated 9 February 1996 and letter No. 152/Kpts-II/1997) covering an area of 17,500 ha. There is no information that the land acquisition was from legal compensation from the community. As well as in SIA and HCV document and stakeholder's consultation stated that there is no customary rights and traditional rights within Certificate Holder's area. Based on consultation with Village Head of Dabek and Community Figure of Muara Wahau Village, known that the land is not obtained from land acquisition of individual rights, customary rights, or traditional rights.

Based on management interviews, it is known that the unit of certifications has no plans to expand the land by legal compensation for community. However, the company has procedures related to land identification, acquisition, and compensation in FPIC manner that is SOP of Land Acquisition (No. SOP-AGR-071-R02 dated 1 August 2017) and SOP Land Compensation (No. SOP-AGR-058-R03 dated 15 July 2019).

Status: Comply

4.5

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

to express their views through their own representative institutions.
4.5.1; 4.5.2; 4.5.3; 4.5.4; 4.5.5; 4.5.6; 4.5.7; 4.5.8

There is no change / new development in the area of PT DSN-POM 4 until this assessment. In the Decree of the HGU, it was explained that the entire area of PT SWA originated from the forest area which was released through Decree of Forestry Ministry No. 174/Menhut-VII/1996 dated February 9, 1996 and letter No. 152/Kpts-II/1997 covering an area of 17,500 ha. There is no information that the land acquisition was from legal compensation from the community. As well as in SIA and HCV document stated that there are no customary rights as well as traditional rights within CH's area.

Status: Comply
4.6
Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.
4.6.1; 4.6.2; 4.6.3 and 4.6.4

The unit of certifications land is not obtained from land acquisition from individual rights, customary rights, or traditional rights. In the Decree of the HGU, it was explained that the entire area of PT SWA originated from the forest area which was released through Decree of Forestry Ministry (No. 174/Menhut-VII/1996 dated 9 February 1996 and letter No. 152/Kpts-II/1997) covering an area of 17,500 ha. There is no information that the land acquisition was from legal compensation from the community. As well as in SIA and HCV document and stakeholder's consultation stated that there is no customary rights and traditional rights within Certificate Holder's area. Based on consultation with Village Head of Dabek and Community Figure of Muara Wahau Village, known that the land is not obtained from land acquisition of individual rights, customary rights, or traditional rights.

Based on management interviews, it is known that the unit of certifications has no plans to expand the land by legal compensation for community. However, the company has procedures related to land identification, acquisition, and compensation in FPIC manner that is SOP of Land Acquisition (No. SOP-AGR-071-R02 dated 1 August 2017) and SOP Land Compensation (No. SOP-AGR-058-R03 dated 15 July 2019).

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 unit of certifications land is not obtained from land acquisition from individual rights, customary rights, or traditional rights. In the Decree of the HGU, it was explained that the entire area of PT SWA originated from the forest area which was released through Decree of Forestry Ministry (No. 174/Menhut-VII/1996 dated 9 February 1996 and letter No. 152/Kpts-II/1997) covering an area of 17,500 ha. There is no information that the land acquisition was from legal compensation from the community. However, there is plasma or scheme smallholder under PT Swakarsa Sinarsentosa that is Cooperative of Min Sun Lekut (Kemitraan 1), Cooperative of Min Bea Glang Mandiri (Kemitraan 2) and Cooperative of Jengea Bong Pet Kuq (Kemitraan 10).

As well as in SIA and HCV document and stakeholder's consultation stated that there is no customary rights and traditional rights within Certificate Holder's area. Based on consultation with Village Head of Dabek and Community Figure of Muara Wahau Village, known that the land is not obtained from land acquisition of individual rights, customary rights, or traditional rights.

Based on management interviews, it is known that the unit of certifications has no plans to expand the land by legal compensation for community. However, the company has procedures related to land identification, acquisition, and compensation in FPIC manner that is SOP of Land Acquisition (No. SOP-AGR-071-R02 dated 1 August 2017) and SOP Land Compensation (No. SOP-AGR-058-R03 dated 15 July 2019).

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

Based on field observation, review of hectare statement and interview with Village Head of Dabek and Community Figure of Muara Wahau Village and also government agencies of Kutai Timur District, known that there is no land dispute within the area of PT SWA since 2012. Nevertheless, the CH has an Operation Director Memorandum (No. 0030/MS/XI/2016 dated 1 November 2016) related to the policy of not using violence, intimidation, or the use of paramilitaries in resolving disputes/conflicts, as well as SOP for Conflict Handling (No. SOP-AGR-007-R00 dated 15 February 2012), state that the stages of conflict resolution are conducted by deliberation or by legal means.

Based on available records, land disputes have occurred and have been resolved, namely land disputes in the Long Jenew 2 Estate between the company and the community on behalf of Lied Jie Tot for arable land covering an area of 115 hectares and with the community on behalf of Anton Beang for arable land covering an area of 30 hectares. The cultivators of the land are not willing to accept compensation for the crops. There is evidence of dispute resolution for both cases, as shown by the Collective Agreement dated 19 May 2012 between PT SWA and cultivators from Jabdan Hamlet, Benhes, and Nehes Liah Bing Village. Based on this decision, PT SWA decided not to carry out the exploitation until the cultivators were willing to give up their land and the community acknowledged that the land was within PT SWA's HGU area. Therefore, in the company statement area, this area is included in the occupational category.

Results of interviews with Village Head of Dabek and Community Figure of Muara Wahau Village were found that the CH never used violence or intimidation in resolving disputes, but was deliberated first.

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
The determination of the price of FFB to Plasma Cooperatives follows the determination of the price of FFB for Palm Oil from the FFB Pricing Team for the Province of East Kalimantan, for example the Minutes of the Results of the Meeting on the Determination of the Purchase Price of FFB for Palm Oil Production in the Province of East Kalimantan for the April 2022 period. For example, the price of FFB with age 9-year plants amounted to Rp. 3,536.21 and the age of plants >10 years was Rp. 3,577.69. while the FFB price for the March 2022 period with a 9-year plant age is IDR 3,412.14 and a plant age > 10 years is IDR 3,452.16.

Based on the results of interviews with representatives of the Min Sun Lekut and Min Blea Glang Mandiri cooperatives, it is known that the FFB price set by the company is based on the price from the East Kalimantan Provincial Plantation Service. Information regarding the FFB price will be conveyed by the company via WhatsApp message

5.1.2
The determination of the price of FFB to farmers is determined by the Plantation Service of the Province of East Kalimantan. In determining the price of FFB, farmers are also involved. The determination of the FFB price is always known by the plasma farmers because every time there is an update on the FFB price, the company always provides information to the cooperative leadership to be informed to all its members. This is in line with the results of consultations with cooperative management who stated that information regarding the price of FFB is known every week through WhatsApp messages.

5.1.3
As explained in indicator 5.1.2, the determination of the price of FFB to farmers is determined by the Plantation Service of the Province of East Kalimantan. In determining the price of FFB, farmers are also involved. The determination of the FFB price is always known by the plasma farmers. The price agreement has also been explained in the cooperation agreement between the company and the farmers where the price of FFB is based on the price set by the Plantation Office. For the determination of the premium value until the appraisal activity is carried out, there has been no determination of the premium value between the company and the farmers.

5.1.4
Based on the results of interviews with the chairman of the cooperative, Min Sun Lekut and Min Blea Glang Mandiri, it was found that

the cooperative had understood the contract/Mou with the company and there was no coercion from the company. So far, the cooperation with the company has been going well and the cooperative has the authority to make decisions.

5.1.5

Companies can show cooperation agreements with Plasma cooperatives that cooperate with companies, for example:

- The contract between the company and the Plasma Min Sun Lekut cooperative in Benhes Village number 085/Dir-ND/SWA/JKT/VIII/05 dated 6 August 2005, signed by company representatives, cooperative representatives and acknowledged by the East Kutai Regent.
- Contract between the company and the Plasma Min Blea Glang Mandiri cooperative in Dabeq Village number 113/Dir-ND/SWA/JKT/VIII/05 dated 6 August 2005, signed by company representatives, cooperative representatives and acknowledged by the East Kutai Regent.

Based on document verification, it is known that the validity period of the agreement starts from the date it is signed until the debt is paid in full. The agreement (MoU) or contractual contract stipulates completely and clearly the rights and obligations of both parties, the technical provisions of the agreement / work to a fair payment method agreed upon by both parties.

5.1.6

Companies can show proof of FFB payments to FFB suppliers such as the Min Sun Lekut Cooperative, the Bea Gelam Mandiri Cooperative, and also PT Roni Putra Abadi. For example, the following is proof of FFB payments made by the company:

- Proof of payment of FFB to the Min Sun Lekut Cooperative for the period March 2022 as much as 331,110 Kg which was paid through a BCA Bank account on March 31, 2022. Based on document verification, it is known that the price of FFB paid was in accordance with the FFB price set by the Plantation Service of East Kalimantan Province. The proof of payment also explains proof of deduction in the form of tax deductions.
- Proof of payment of FFB to the Min Blea Glam Mandiri Cooperative for the period March 2022 as much as 4,700 Kg which was paid through a BCA Bank account on March 31, 2022. Based on document verification, it is known that the FFB price paid was in accordance with the FFB price set by the Plantation Service of East Kalimantan Province. The proof of payment also explains proof of deduction in the form of tax deductions.
- Proof of FFB payment to PT Roni Putra Abadi for the November 2021 period of 61,566 Kg which was paid through a BCA Bank account on November 30, 2021. Based on document verification, it is known that the FFB price paid was in accordance with the FFB price set by the East Kalimantan Provincial Plantation Service. The proof of payment also explains proof of deduction in the form of tax deductions.

Based on the results of interviews with representatives of the Min Sun Lekut Cooperative, Bea Glam Mandiri Cooperative, and PT Roni Putra Abadi, it is known that so far there have been no complaints regarding the price or payment of FFB made by the Company. The cooperation between the Cooperative and the Company is going quite well.

5.1.7

The results of document verification revealed that the last re-calibration/scale calibration activity was carried out in 2019 with a validity period of up to 19 September 2020. Until now, the activities up to the remote audit of ASA 1.1 + ASA 1.2 were carried out, the Company has not been able to show the latest recalibration results. In this case the company shows the following evidences:

- Application letter from PT Dharma Satya Nusantara to the Department of Industry and Trade of the East Kutai Regency Government with Number 0031/DSN-LGL-JKT/I/2022 dated January 10, 2022 regarding the follow-up request and the estimated schedule for measuring electronic weighbridges for palm oil processing mill activities PT Dharma Satya Nusantara Tbk in East Kutai Regency, East Kalimantan province.
- Letter from the Industry and Trade Office of East Kutai Regency Number B-510.3/427/Disperindag-PKTN/I/2022 dated January 25, 2022 regarding notification of the implementation of calibration/re-calibration to PT Dharma Satya Nusantara explaining that the calibration/re-calibration service at Until now, East Kutai Regency has not been able to be served due to the lack of availability of the required standard equipment. Besides that, East Kutai Regency UML has collaborated with BSML Regional III in Banjarmasin in this case facilitation where BSML Regional III provides calibration services throughout Kalimantan, so they have to wait for service queues. If the re-calibration can be carried out, it will be informed to the company.

The results of the previous assessment (Remote Audit ASA 1.1.) the recalculation activity has become OFI and until the onsite audit activity (ASA 1.1 + 1.2) the recalculation activity is still not able to be carried out. The company has the opportunity to continue to

ensure that recalibration activities run positively. (OFI).

5.1.8

Based on the results of interviews with the Sumber Sustenance Cooperative from Karya Bakti Village, which is an Independent Smallholder Cooperative that supplies FFB to the company, it is known that the company has socialized RSPO certification to the Farmers Cooperative. Currently, Sumber Rezeki Cooperative is in the preparation stage for RSPO certification. Cooperative members also have a certificate of cultivation registration (STDB) issued by the East Kutai Regency Plantation Service. for SKI currently has not been determined by the Cooperative.

5.1.9

The company has procedures for communication and handling of external complaints, document number SOP-AGR-044-R02 dated October 14, 2019. This procedure explains the process for handling complaints and dissatisfaction where the Social officer receives letters of complaint and dissatisfaction directly from the complainant or indirectly through the suggestion box. . The procedure also presents a communication flow chart and external complaint handling at the Jakarta head office, a flow chart for handling external complaints on site and attaching forms (requests for information, handling complaints, monitoring requests for information and monitoring external complaints).

Based on the verification of the complaint book document, it is known that during 2021 there were no complaints from farmers, both plasma farmers and independent smallholders.

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

The company has consulted with the farmers to follow the RSPO certification. The company has also conducted several trainings and socializations related to the RSPO with the aim that plasma and independent smallholders follow the management standards in accordance with the RSPO. Based on the results of interviews with the head of the cooperative, Min Sun Lekut and Min Blea Glang Mandiri, it is known that the company has provided several trainings such as training related to plantation management, RSPO, cooperative management, etc. Currently, Ming Sun Lekut and Ming Bea Gelam Mandiri cooperatives are still in the process of preparing for RSPO certification.

5.2.2

The company shows programs to improve livelihoods, including at least capacity building to increase productivity, quality, organizational and managerial skills described in the work program of the assisted farmer groups, while examples of programs are:

- Traceability training.
- Training related to pesticide application.
- Fertilization.
- Training related to the anticipation of caterpillar attacks.
- Cooperative Managerial Training
- Etc.

Based on the results of interviews with the head of the cooperative, Min Sun Lekut and Min Blea Glang Mandiri, it is known that the company has provided several trainings such as training related to plantation management, RSPO, cooperative management, etc.

5.2.3

Based on the results of interviews with the head of the cooperative, Min Sun Lekut and Min Blea Glang Mandiri, it is known that currently the legality of land owned by farmers is in the form of SHM and SKT. The company also encourages farmers so that the legality of their land is clear and does not enter the forest area.

5.2.4

The representative of the certificate holder explained that the plasma operations were fully carried out by the company. He also shows training related to safe work using pesticides and technical application according to procedures. This training was held at the Learning Center on February 23, 2022, which was attended by warehouse officers and Plasma Foreman.

5.2.5

The company shows evidence of reviewing and publicly reporting on the progress of the farmer support program on a regular basis described in the partnership department management review report as well as in the plantation business development report which is reported to the East Kutai Regency Government.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS
6.1
Any form of discrimination is prohibited.
6.1.1

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

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

UoC also showed the record of the company's socialization for instance the socialization which was conducted on 10 January 2022 for all workers in POM 4. Based on the workers' recruitment document and interviews with the workers, UoC had provided equal opportunities in recruitment and operational activities. In addition, in job vacancies that have been published by the company, there were no requirements that discriminated against gender, race or ethnicity, disability, sexual orientation, age, or belief.

Based on the interviews with the gender committee, female workers are given equal rights, wages and opportunities to get promotions with male workers of the same type of work, for example, most of pesticide application workers are female workers.

6.1.2

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

Based on the interviews with the manpower agency, gender committee, labor unions, and workers (harvesters and mill operators) at POM 4, JB 1 Estate, LJ 1 estate, LJ 2 Estate, it is known that workers have never felt that the company has discriminated against them. It was explained that all activities from recruitment, performance appraisal, and promotion were given equal opportunity regardless of ethnicity, caste, nationality, religion, disability, gender, sexual orientation, gender identity, membership in labor unions, politics, or age. There was no difference in the communication between superiors and workers because of the things mentioned above, so the workers did not feel isolated or discriminated against by the superiors. The company also didn't request for any payment during the recruitment process.

6.1.3

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

- Recruitment document in accordance with the recruitment requirements such as employment request form, application letter, statement of police report, identity card (KTP), family identity card (KK), the result of written test, the result of medical check up,

and work agreement letter. For example, a worker on behalf of AR (initial) who sent the job application letter in August 2021 and started working on 1 September 2021.

- Promotion documents such as management decree for worker's promotion. For example, a worker on behalf of ST (initial) who had a promotion based on worker's appraisal, from SKU worker to 3 down grade worker in harvesting clerk on 01 25 October 2021.

6.1.4

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

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

6.1.5

Gender committees had been formed and still active until today in PT. DSN POM 4 and PT. SWA which are chaired by the coordinator along with the head of gender committee. The structure of the gender committee consists of only female workers. The main objective of forming a gender committee is to provide a forum that can accommodate the aspirations or complaints of workers (especially women).

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

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

6.1.6

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

Based on the interviews with workers (harvesters, maintenance workers, and mill operators), the workers already know that there was a wage scale structure for each level of workers and this has been proven by the difference in the monthly wage income presented on the pay slip. Based on the document review of worker's pay slip in both gender and the interviews with the workers in the same grade and same job, it's known that the monthly wages received are in accordance with the grade owned by each worker.

Status: Comply

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

6.2.1

UoC had procedures related to recruitment, selection, remuneration, promotion, retirement and termination of employment which are generally described in the Company Regulation period 2022 to 2024 written in *Bahasa*. The company regulation in PT. DSN and PT. SWA has been registered in manpower agency of Kutai Timur District for example by decree No. KEP/560/1132/B.PHI&JAMSOSTEK/2022. This company regulation explained the working conditions and rights / obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, overtime, and other provisions. The company regulation applied to all workers and had been routinely disseminated by the certification unit to all

employees, one of the socializations that was carried out on 6 April 2022 which was attended by 27 participants.

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

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

6.2.2

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

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

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

- Decree of the Governor of Kalimantan Timur No. 561/K.599/2021 concerning the minimum wage of Kutai Timur District in Kalimantan Timur period of 2022 is Rp. 3,175,427.45/month.
- Management Decree No. 032/DIR/XII/2021 concerning the minimum wage of PT. DSN in 2022 is Rp. 3,175,450.-/month determined based on Minimum Wage Determination in 2022. Besides basic wage, workers also received rice allowance 0.5 Kg/day.
- Structure and Scale of Wage of DSN Group updated on 1 January 2022. It's known that workers with the lowest wages are employees with 0-1 year of work period, and the highest wages for workers with 30 years of work period (Rp. 4,756,470).

UoC showed overtime payment in March 2022 to April 2022 that has been in accordance with applicable laws for workers on behalf of PS (initial) as boiler operator, RW (initial) as sterilizer operator, and TK (initial) as security. In the pay slip document, it's known that the nominal of the worker's overtime wages has in accordance with the overtime calculation.

A review of payslip document (harvester, maintenance worker, security, and mill operators) for March to April 2022, proved that the wages received are above the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2021. For example, workers' wages on behalf of IR (initial), YN (initial), PS (initial), RW (initial), and TK (initial) have a different wage based on wage scale structure in 2022 and all wages above the minimum wage. Payslip document gives accurate information on compensation consist of basic wage, allowance, premi/ overtime, working days and deduction.

UoC also showed paid leave letter which showed that maternity leave was given 3 months of paid leave. For example, the paid leave letter on behalf of NM (initial), who had given 3 months and had been approved by the supervisor on 18 September 2021.

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

6.2.3

UoC showed overtime payment in March 2022 to April 2022 that has been in accordance with applicable laws for workers on behalf of PS (initial) as boiler operator, RW (initial) as sterilizer operator, and TK (initial) as security. In the pay slip document, it's known that

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Penalties are given specifically to the worker if the worker does not meet the specifications agreed upon at the beginning for example if there was a raw fruit. In addition there was a penalty if the harvester picked FFB was not in accordance with the criteria for harvesting. Based on the interview with all workers, the information on harvesting penalties is known by all workers through the morning briefing. Harvesting penalties also do not cut basic wages but the harvesting incentives if the harvesting worker got more that their basis.

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

6.2.4

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

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

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

6.2.5

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

6.2.6

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

UoC has the determination of assessment prevailing wage and all kinds of benefit for DLW simulation in 2022 has been included in the calculation of food costs, housing facility costs, transportation, educational cost, daycare facility, sport facility, health cost, electricity, and water costs. The results of these calculations are known that the standard of prevailing wage currently given / simulated by the certification unit is above the stipulation of the minimum wage (Rp. 3,175,450) as much as Rp. 8,218,218.51 per month.

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

6.2.7

During the assessment, there were no workers with contract status/daily workers. The current employee status are permanent workers and permanent workers with 3 months probation. The number of workers currently worked in the certification unit is 1,408 workers.

Status: Comply

6.3

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

6.3.1

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

Based on the interviews with labor union representatives, it explained that the company had given freedom of association and labor unions have been formed. The establishment of the union was in accordance with the applicable laws and regulations and has been recorded in Manpower Agency of Kutai Timur District, for instance the Registration Number. 07/02/SP-SB/Nakertrans-HIJ/I/2013 of DSN Labor union on 30 January 2013. UoC gave the freedom for worker to express their aspiration democratically and there was no intervention against labor union activity.

Based on the document review, it's known that the UoC also documented the number of labor union operating in UoC operations area and its members' number, for instance: Labor Union of DSN POM 4 with 115 total members.

6.3.2

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

- The meeting between the labor union (SWA) and management representative on 2 March 2022 to discuss about the gender committee program in 2022 attended by 9 persons.
- The meeting between the labor union (SWA) with management representative on 6 June 2021 to talk about the COVID vaccine and the health suggestion during pandemic attended by 20 persons.

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

6.3.3

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

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

Status: Comply

6.4

Children are not employed or exploited.

6.4.1

UoC had a policy concerning on children/underage worker protection (No. 055/DIR/XII/2016) validated on 01 December 2021. This policy applies to all operational areas of DSN Group. It stated that the group prohibited to recruit employees under the age of 18 years old and prohibited the workers to bring children along in doing work (moreover to help the workers doing their work). UoC also showed the statement letter signed by Human Capital Section Head of PT. DSN which stated that they do not employ under-age worker.

UoC then showed that they had socialized the policy to all parties including smallholders and contractors for instance the socialization held on 6 February 2021 to all smallholders and contractors' workers.

6.4.2

UoC showed the recruitment document in accordance with the recruitment requirements such as application letter of workers on behalf of AR (initial) on 16 January 2022, statement of police report, identity card (KTP), family identity card (KK) which stated that the worker is above the minimum age of worker.

UoC had socialized the policy to all parties including smallholders and contractors for instance the socialization held on 6 February 2021 to 35 participants consist of smallholder workers, contractors, and communities. Based on documents verification and field observation, there were no workers under the age of 18 and there was no child around the work area. In addition, UoC also includes clauses on child protection and prohibitions on hiring workers under the age of 18 in any agreement.

6.4.3

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

6.4.4

UoC had socialized the policy to all parties including smallholders and contractors for instance the socialization held on 6 February 2021 to 35 participants consist of smallholder workers, contractors, and communities. Based on documents verification and field observation, there were no workers under the age of 18 and there was no child around the work area. In addition, UoC also includes clauses on child protection and prohibitions on hiring workers under the age of 18 in any agreement.

Status: Comply

6.5

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

6.5.1 and 6.5.2

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

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

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

Based on the documents review and interviews with workers (harvesters, maintenance workers, and mill operators), disallowance of sexual harassment and violence had been routinely socialized by the management, one of the socialization was carried out on 6 April 2022 which was attended by 27 workers and occupants.

Based on the interviews with the gender committee and daycare officer, the company had given 15 minutes for breastfeeding woman and provided certain place for breastfeeding. There were no grievance or complaint related to sexual harassment during 2020 to 2022.

6.5.3

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

UoC also showed that they had well-evaluate the needs of pregnant women by giving some pregnant women class (counseling). The class explained some discussion including signs of pregnancy, physical changes in pregnant women, common complaints experienced during pregnancy, things to avoid during pregnancy, myths, and facts about pregnancy, and many more.

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

6.5.4

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

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

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1

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

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

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

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

6.6.2

Based on documents review and interviews with the manpower agency, gender committee, labor union, and workers at POM 4, JB 1 Estate, LJ 1 Estate, and LJ 2 Estate, it's known that there were no contract workers and migrant worker in all units.

Status: Comply

6.7

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

6.7.1

The certificate holder has 2 OHS Committee structures, namely PT DSN for POM 4 and PT SWA for Jabdan 1 Estate, Long Jenew 1 Estate, and Long Jenew 2 Estate. Both structures have been approved by the East Kalimantan Provincial Manpower Office, as follows:

- Decree of the Manpower and Transmigration Office of East Kalimantan Province No. 566/162/P2K3/PPK/DTKT/2022 dated April 19, 2022 concerning Ratification of the OHS Committee of PT Dharma Satya Nusantara – POM 4.
- Decree of the Manpower and Transmigration Office of East Kalimantan Province No. 566/159/P2K3/PPK/DTKT/2022 dated April 19, 2022 concerning Ratification of the OSH Committee of PT Swakarsa Sinarsentosa.

The secretary of each committee is OHS Expert that appointed by Manpower Ministry through:

- Decree No. KEP.213 01/NAKER-BINWASK3 VII/2018 dated 24 August 2018 namely Silvester Romavit Moa Meke was appointed as General OHS Expert PT DSN POM 4, valid for 3 years (24 August 2021). Currently in the process of extending the SKP license (Certificate of Appointment) of OHS Expert Authority at the Ministry. The CH shows a letter from PJK3 (Service Company, related to OHS) PT Derap Pembangunan Jaya number 178/EXT-DJP/V/2022 regarding the process of extending the OHS license. This becomes **OFI** for the company.
- Decree No. 5/32785/AS.02.04/XII/2020 dated 07 December 2020 namely Fitri Riyadi, that valid until 07 December 2023.

OHS Committee conduct monthly meeting regularly and documented the meeting in form of minutes of meeting. All the discussion, the result of discussion, and the PIC of each discussion is recorded in the Minutes of meeting (Mom). Below is the example:

- Mom of POM 4 OHS Committee for the period March 2022 on March 9, 2022 with discussions covering work accident analysis, safety patrol results, and environmental hygiene.
- Mom of PT SWA OHS Committee for the period March 2022, April 13, 2022 with discussion of work accidents, and evaluation of audit records, procurement of eyewash and trash bins.

6.7.2

The certificate holder has emergency response procedures, such as First Aid Procedures, Occupational Accidents and Diseases Handling Procedures and Emergency Preparedness Procedures. Based on field observations to POM 4, it is known that there are first aid kits in the office, workshop, and engine room. The contents of the first aid kit refer to attachment 2 of the Minister of Manpower and Transmigration No. 15/MEN/VIII/2008 regarding first aid in the workplace. The location of the first aid kit is not more than a 500 m radius, according to article 5 of the same regulation. In addition, there are sirens, eye washers, and body washers at temporary hazardous waste store for POM. In the estate there are also emergency response facilities such as eye washers and body washers in chemical mixing facilities.

Based on observations and interviews at the Jabdan 1, Long Jenew 1, and Long Jenew 2 estates revealed that a first aid bag was provided by the foreman, with the contents referring to attachment 2 of the Minister of Manpower and Transmigration No. 15/MEN/VIII/2008. Based on interviews with workers who brought first aid kits or worked at the location of first aid kits at POM 4 or in the estate, it was found that 3 out of 10 workers did not fully understand the function of the available first aid kits. This is an opportunity for improvement (**OFI**) for the company to improve the understanding of first aid carriers so that they can carry out their duties properly.

6.7.3

The Certificate Holder has a procedure regarding Employee PPE (No. SOP-AGR-072-R00, dated September 01, 2016) which includes the determination, procurement, and evaluation of PPE, as well as Estate PPE standards. Then there is Memorandum No. 002/DIR/JKT/III/17 from the Operations Director, dated February 13, 2017 regarding the enforcement of discipline in the use of PPE in the work environment which confirms that employees are required to wear PPE when doing their work in accordance with Company Regulations and SOPs regarding OHS. Then replace the damaged PPE by submitting the damaged PPE to the warehouse officer to be replaced with a new one. In the POM PPE Matrix, updated on January 12, 2018, it is known that the shoes used in the PKS 4 area are safety shoes for workers, contractors, and guests. The replacement period for normal PPE safety shoes is once a year.

The results of field observations and worker interviews at the Sortation, Tipler, Engine Room, Boiler, and Kernel POM 4 stations revealed that 6 workers used rubber boots and 1 worker wore safety shoes which he bought himself. The results of the interview are known to be dominant because the safety shoes distributed by the company are damaged and there is a difference in understanding about replacement if the safety shoes are damaged. Dominant understands that if the replacement period is not over, then you have to buy your own and the cheapest option is to use rubber boots, meanwhile there are workers who have reported, but received information that there are no safety shoes in stock. Some workers stated that the use of rubber boots was already known to their

superiors. At the time of the audit, the company still had safety shoes in stock.

Based on this evidence, the Company has not fully demonstrated the implementation of the provision of Personal Protective Equipment (PPE) which is provided free of charge to all workers in the workplace in accordance with the procedures and memorandums that it has. This becomes a **2022.01 non-conformity**.

6.7.4

UoC provided health services such as clinics and paramedics. Based on field observations, it was known that the facilities and infrastructure provided due to medical services for workers are in proper condition. Based on the documents review and interviews with workers (harvesters, pesticide applicators, mill operators), it revealed that all workers were registered in the BPJS program. The BPJS has been paid for all workers in accordance with the number of total workers in its payment period, proven as follows:

- BPJS (Health Insurance) payments for DSN POM 4 have been completely fulfilled and the last proof of payment is on 6 April 2022 for period of April 2022.
- BPJS (Health Insurance) payments for PT SWA have been completely fulfilled and the last proof of payment is on 6 April 2022 for period of April 2022.
- BPJS (Social Security Insurance) payments for DSN POM 4 and PT SWA have been completely fulfilled and the last proof of payment is on 10 May 2022 for period of April 2022.

Based on the interviews with workers (harvesters, pesticide applicators, and mill operators) and labor union, they informed that they had the acknowledgement of their involvement in BPJS program and they also held the BPJS card. The workers also didn't meet any problems when they claimed the health insurance.

6.7.5

The certification unit has recorded work accidents using Lost Time Accident (LTA), which is listed in the Work Accident Board document. These documents include explaining the level of work accidents such as death, serious injury (lost time > 3 days), minor injuries (lost time < 2 days), first aid (without lost time), total employees, total reportable accidents, total work accident cases (lost time > 3 days), total working hours, FR and SR as well as work accident statistics for the 2021 period per month.

Based on the verification of work accident documents in 2022, until April 2022, it is known that there were no work accidents that caused death or serious injuries either at the POM 4 location or at the estate. Based on interviews with OHS Experts, it was revealed that work accidents that occurred were only in the minor category with first aid kit control so that no workdays were lost.

6.7.3 critical	Status: Non-conformity 2022.01 with major category
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PRINCIPLE #7 PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT

7.1

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

7.1.1

Based on document verification and interviews during the onsite audit of ASA-1.1 & 1.2, it is known that there has been no revision of the IPM Control Work Instruction. The company is still using IK-AGR-OLP-13-R00 about Early detection pest and diseases and IK-AGR-OLP-14-R00 about Diseases Control. 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* and *Antigonon leptopus*) to anticipate fire caterpillars, as well as installation and monitoring of BOB (Barn Owl Box) 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.

The Certificate Holder has conducted a pest and disease census on a monthly basis. They showed the results of the census of termites, caterpillars, and mice for the period January - April 2022. Based on review of the census documents for the period April 2022, there were no attacks by termites, caterpillars, and mice.

Based on field observations at Block C19 Afdeling 5 Jabdan 1 Estate, Block B46 Afdeling 3 Long Jenew 1 Estate, and Block F46

Afdeling 12 Long Jenew 2 it is known that the condition of the Barn Owl Box is in an active condition marked by feather marks and the remains of food bones. Field observations also show that almost every Main Road and Transport Road has been planted with *Turnera ulmivolia*, and *Antigonon leptosus* has been planted in the corner of the block. Based on field observations in pest and disease detection activities at Block 32 Afdeling 3 Jabdan 1 Estate, it is known that the detection officers have understood the identification of pests and diseases according to the procedure. The results of field observations and interviews with harvesting, spraying, and maintenance activities did not reveal any signs of pest and disease attacks.

7.1.2

The certificate holder has an invasive species listing established in the certification operational area unit, which refers to the Regulation of the Minister of Environment and Forestry (PermenLHK) No. 94 of 2016. Based on the list of invasive species, it is known that the company uses *Turnera ulmivolia* to control caterpillar pest populations. Based on field observations, it is known that almost every Main Road and Transport Road has been planted with *Turnera ulmivolia* in a well-maintained condition.

7.1.3

Based on the review of pest control documents and pest control procedures owned by the company, there is no pest control using fire. The results of discussion with related management representatif revealed that the company did not use fire in pest control, and the results of field visits in harvesting, spraying, and maintenance activities in Jabdan 1 Estate, Long Jenew 1 Estate, and Long Jenew 2 Estate, did not find traces of the use of fire in controlling pest.

Status: Comply

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

7.2.1

The Certificate holder has work Instructions for Determining the Type of Pesticide Dosage and Applicator (IK-AGR-OLP-16-R01) regarding pesticide chemicals that are suitable for certain weeds, for example Glyphosate for narrow and wide leaf weeds and methyl metsulfuron for wood growth.

Based on field observations and interviews with pesticide applicators in circle path spraying activities in Block A15 Afdeling 1 Jabdan 1 Estate and Block H48 Afdeling 13 Long Jenew 2 Estate, it is known that the herbicides used are glyphosate and methyl metsulfuron. From the interviews, it was also known that they no longer used paraquat.

7.2.2

The certificate holder shows the results of monitoring or recording usage records for all pesticides used for the period 01 January - 31 December 2021 (including the active ingredients used and the LD50 dose, the area of pesticide use, the number of active ingredients used per hectare, and the number of active ingredients used per hectare). For example Kleen up 480 with the active ingredient isopropyl amine glyphosate as much as 13,190 liters; has an LD 50 of 4.230 mg/kg; application area 15,282 ha; with active ingredients per area of 0.419 liters/ha.

7.2.3

Based on the census of caterpillars and mice in Jabdan 1 Estate, Long Jenew 1 Estate, and Long Jenew 2 Estate in April 2022, it was found that there were no caterpillar and rat attacks. This is positively correlated with planting useful plants as habitat for caterpillar predators (such as *Turnera ulmivolia* and *Antigonon leptosus*) along Main Road and Transport Road, as well as the use of owls for rat control. The results of the review of documents on the use of chemicals in 2021, it is known that there is no use of pesticides for pest and disease control.

7.2.4

Based on interviews with company representatives, it was found that there was no use of pesticides for prophylactic purposes. The results of field observations and interviews with pesticide applicators showed that pest control was not carried out for prophylactic purposes.

7.2.5

Based on the review of the pesticide use document in 2021, it is known that the active ingredients of the pesticides used are methyl metsulfuron, glyphosate, fluroxipir, and triclopyr which are identified in WHO pesticides class U, class II, and class III.

Based on field observations and interviews with pesticide applicators in circle path spraying activities in Block A15 Afdeling 1 Jabdan 1 Estate and Block H48 Afdeling 13 Long Jenew 2 Estate, it is known that the herbicides used are glyphosate and methyl metsulfuron. From the interviews, it was also known that they no longer used paraquat.

7.2.6

Based on field observations and interviews with pesticide applicators in circle path spraying activities in Block A15 Afdeling 1 Jabdan 1 Estate and Block H48 Afdeling 13 Long Jenew 2 Estate, it is known that pesticide applicators had carried out work practices according to safe work procedures and practices by using appropriate PPE. They can explain if after finishing the spray application, PPE and work tools are cleaned in the wash house and dried/stored there. The results of the Observation of the Wash House facility on the Estate, it is known that the washing house has been functioning properly.

7.2.7

Based on field observations to the pesticide warehouse of the Jabdan 1 Estate, Long Jenew 1 Estate, and Long Jenew 2 Estate, it is known that the pesticides have been stored neatly separately from other materials. The warehouse has been equipped with MSDS, emergency response facilities, adequate ventilation, and is locked because the area is limited.

7.2.8

Based on field observations at the Chemical Warehouse, as well as interviews with operators in each Plantation and Factory, it is known that used pesticide containers will be stored in temporary shelters for Hazardous and Toxic waste which were built with OHS and environmental aspects in mind. The water used for rinsing will be reused as mixing water for chemical activities.

Based on the results of field visits to employee housing areas, it was found that there were no traces of used pesticide packaging, for example as water reservoirs or flower pots.

7.2.9

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

7.2.10

Based on the study of cholinesterase inspection documents at the Permata Medica Clinic, for pesticide handling workers carried out in January 2022, did not find anything below the normal threshold. The results of interviews with medical officers and company doctors also revealed that the results of the cholinesterase examination from 2021 to January 2022, the results for workers were within normal limits.

7.2.11

Based on field observations and interviews with pesticide applicators in circle path spraying activities in Block A15 Afdeling 1 Jabdan 1 Estate and Block H48 Afdeling 13 Long Jenew 2 Estate it is known that the materials used are glyphosate and methyl metsulfuron. It was found too, that the pesticide applicator was not pregnant, breastfeeding, over 18 years old, and had carried out according to safe work procedures and practices.

Status: Comply

7.3

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

7.3.1

The company shows identification of waste sources for the 2021/2022 period with details: ex sacks of fertilizer, inner plastic of fertilizer sack, used oil from generator, used neon/lights, wastewater, EFB, Shell, fiber, dash of incinerator, dash of boiler, domestic waste, paper and others.

Sources of emissions include:

- CO2 Gas: Transportation of FFB, CPO Shipping, Operation of heavy equipment, operation of generator & electric pumps, management of WTP, boilers, laboratory activities, waste ponds and Mill processes.

- Gas NO₂ & SO₂: Activities in the laboratory.
- Gas CH₄: Fertilizing activities and WWTP ponds.

Hazardous and Toxic waste

Hazardous Waste generated by the Estate and Factory will be stored in the Temporary Storage of Hazardous Waste owned, then will be transported by a licensed third party which will then be handed over to the licensed hazardous waste manager. The company already has a Hazardous Waste Temporary Storage Permit and it is still valid for both POM 4 and PT Swakarsa Sinarsentosa.

In terms of transporting hazardous waste, the company cooperates with a licensed hazardous waste carrier, namely PT Sumber Rezeki Abadi Jaya. The company can show a cooperation agreement with the carrier, namely:

- Letter of Cooperation Agreement between PT Swakarsa Sinar Sentosa and PT Sumber Rezeki Abadi Jaya with Number 007/SWA/JKT/2022 on January 3, 2022 with a validity period of up to December 31, 2023.
- Letter of Cooperation Agreement between PT Dharma Satya Nusantara and PT Sumber Rezeki Abadi Jaya with Number 005/DSN/JKT/2022 on January 3, 2022 with a validity period until December 31, 2023.

POM 4

The company can show the official report and manifest of the transportation of hazardous waste on January 14, 2022 which is carried out by the carrier with Vehicle Number KT 8265 OQ. The types of hazardous and toxic waste that are submitted include:

- Used Majun as much as 0.2413 Tons with Manifest KLHK-1654197539
- Used filter as much as 0.0442 Ton with Manifest KLHK-1654197884
- Used packaging of hazardous and toxic materials as much as 0.375 with KLHK Manifest-1654198501
- Used oil as much as 0.9693 Tons with Manifest KLHK-1654199122

PT Swakarsa Sinarsentosa

As for the scope of the plantation, the last Hazardous waste transportation was carried out on January 27, 2022, for example:

- Hazardous waste solid 45 kg and liquid 800 liters No Manifest AUV 001221 (Jb 1 Estate)
- Hazardous waste solid 433 kg and liquid 1,505 liters No Manifest AUV 001223 (LJ 1 Estate)
- Hazardous waste solid 167 kg and liquid 400 liters No Manifest AUV 001224 (LJ 2 Estate)

Solid waste

The solid waste produced by the company is shell, fiber and EFB. The management plan is carried out by reusing solid waste such as shells and fiber to be reused as boiler fuel. Meanwhile, solid waste such as EFB is reused by applying it to plantation areas. This is evidenced by the results of field visits during audit activities that the company has utilized shells and fiber for boiler fuel, while EFB has been reused for plantation land.

POME

POME generated from the factory is reused for Methane capture and Land Applications. Before being sent to LA, POME is first streamed to Methane Capture to be managed so that it can generate electricity and then it will be flowed to the WWTP. POME will then be managed at the WWTP with the aim that the quality of POME that is channeled to LA is in accordance with the provisions. This is evidenced by the results of field visits at the WWTPs, it is known that before being channeled to LA, POME is first channeled to Methane Capture and then it will be channeled to WWTPs, besides that there are no indications of environmental pollution by the company.

Domestic Waste

Domestic waste generated from housing and offices will be disposed of in Landfills. This is evidenced by the results of field visits to the Landfills area that the generated domestic waste will be placed in landfills. In addition, the location of landfills is far from residential areas and water sources.

Based on document verification and field visits, the following evidences were obtained:

- Document identification of sources of waste and pollution of the Estate on January 2, 2022 which explains that the waste generated from fertilization activities is sacks of used fertilizers and inner fertilizers with pollution risk control that is carried out is collected and if it will be reused, do the washing in the wash house, and the inner fertilizer is dumped into the Landfill after washing it clean. The inner fertilizer is not included in the toxic waste category according to a letter from the East Kutai Regency

Environmental Service regarding technical directions with Number: 660/1589/DLH-4.3/XI/2019 on November 22, 2019.

- The Technical Instructions for Handling used fertilizer sacks that were stipulated on January 10, 2021 explained that the sacks (including the inner fertilizer) that had been collected from the block were neatly placed in the Wash House.
- The results of field visits to Estate JB1, Estate LJ1, and Estate LJ2 found several inner fertilizers that were not placed in the Wash House in accordance with the company's technical instructions. The locations where the inner fertilizer was found are as follows:
 1. Estate JB 1: Block A15 and A21 (Afdeling 1), B24 and B25 (Afdeling 4).
 2. Estate LJ 1: Blok B35, B36, B37 (Afdeling 2), B46 (Afdeling 3) and C28 (Afdeling 6)
 3. Estate LJ 2: Blok F47 (Afdeling 12)
- The results of the field visit at wash house Estate JB 1 and LJ 1 revealed that there is no inner fertilizer stored and there is also no place for inner fertilizer collection.

Based on the above evidence, the handling of the inner fertilizer waste carried out by the company is not in accordance with the technical instructions for handling the used fertilizer sacks owned by the company. **NCR No. 2022.02 with Minor Category**

7.3.2

Based on interviews with company management, Manager of Jabdan 1 Estate, Manager of LJ 1 and Head of Hazardous and Toxic Waste Warehouse POM and Estate, it is known that they have understood the handling of waste disposal, especially hazardous and toxic waste and non-hazardous and toxic waste in accordance with the procedures owned by the management unit. Based on the results of field visits to residential areas, it is known that there is no use of hazardous and toxic waste as water reservoirs. In addition, domestic waste management is in accordance with company procedures.

7.3.3

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

7.3.1 Status: NCR No. 2022.02 with Minor Category

7.4

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

7.4.1

The certification holder has best practices mechanism in maintain and improve long term soil fertility, set in SOP of Manuring (No. IK-AGR-OLP-09-R03), SOP of POME Land Application (No. IK-AGR-OLP-10-R02), SOP of EFB Application (No. IK-AGR-OLP-11-R02). Those procedures set bunch of strategy to maintain and improve long term fertility, by combining efficient and measurable in-organic fertilization, take into account the oil palm age and soil nutrient properties by conducting leaf and soil sampling. The efficient and non excessive in-organic fertilization are critical to maintain soil structure and texture, combined with manuring by POME land application and EFB mulching application. The manuring conducted especially in land with low nutrient properties, to improve soil structure and texture, microbiological properties, as well as to minimize in-organic fertilization if possible. The is no replanting activity yet, however the procedure set that the biomass in replanting will have returned to the soil for nutrient cycling strategy.

7.4.2

The Certificate Holder has routinely carried out periodic soil and leaf analysis carried out as follows (1) (Soil Analysis, which is carried out regularly every 6 years by measuring the following parameters; texture, acidity (pH), P, K, Mg content, Ca, Mn, Zn, Cu, and Fe (2) Leaf analysis, which is carried out annually as a guide for determining fertilization recommendations, by monitoring the following parameters: Main Indicator Elements namely N, P, K, Mg and Ca and Indicators Minor elements are B, Cu, Zn, Mn, Fe, S and Cl and (3) Visual Analysis, which is carried out as part of the points in determining fertilization recommendations, identifying symptoms of nutrient deficiency, and analyzing disease attacks that are potentially endemic to disease The last soil analysis was released on April 19, 2017 and the last leaf analysis was released on June 16, 2021 for fertilizer recommendations in 2022, both analyzes were carried out by Laboratorium Analytical & QC PT Nusa Pusaka Kencana.

7.4.3

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

application is presented. EFB mulch application has been applied mainly in sandy areas at a dose of 40 tons/ha/year. Meanwhile, land application for POME with a dose of 750 tons/ha/year in three rotations (250 tons/ha/rotation) has been carried out.

Based on field observations at Block C36 Afdeling 5 Long Jenew 1 Estate, it is known that the EFB application is carried out to form a U Letter around the palm. An observations at Block F42 Afdeling 12, it is known that the company has carried out POME applications and nothing has flowed into the environment.

7.4.4

Based on document review and interviews, it is known that the company has fertilizer recommendations for 2021 and 2022. In the records of fertilization records for 2021, it is known that 100% of the fertilizer recommendations have been realized by the company, even though there is a dose change in the 3rd rotation in 2021. For example, fertilizers Hikay recommended that 12,654.55 tons for 32.295 ha have been realized as much as 11,082.66 tons for the same area. The dose change was made on the advice of the Research department.

Status: Comply

7.5

Practices minimize and control erosion and degradation of soils.

7.5.1

The certification unit has a detailed soil survey document year of 2013 created by the Agro DSN Group R & E Department. Soil and land suitability classes are listed in the document and mapped in scale 1: 70,000. In the conclusion section stated that there is no peat, fragile or marginal soils in the operational area. The main type of soil is alluvial soil with good drainage with a class of S2 (Moderately Suitable). Most of the area of PT Swakarsa Sinar Sentosa is in the Land Class 2. A brief distribution of land survey areas is: class S2 : 16,353 ha, S3 : 424 ha, N : 73 ha.

The unit of certification has a slope map with a scale of 1; 100,000 (source: source: SRTM data (Shuttle Radar Topographic Mission Indonesia Sheet N01E116), which shows a flat area with a major contour of 2 meters, an intermediate contour of 2 meters, a minor contour of 2 meters. Based on document review and interviews with management representative, the unit of certification stated that there was no replanting and new planting on the sloped land.

Based on field observations at Jabdan 1 Estate, Long Jenew 1 Estate, and Long Jenew 2 Estate, it is known that the plantation area is relatively flat.

7.5.2, 7.5.3

When the onsite audit ASA-1.1 and 1.2 were carried out, it was discovered that there were no new plantings and replanting. This is because the average yield in 2021 is 24.5 tons/ha.

Status: Comply

7.6

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

7.6.1, 7.6.2, 7.6.3

The unit of certification has a detailed soil survey document year of 2013 created by the Agro DSN Group R & E Department. Soil and land suitability classes are listed in the document and mapped in scale 1: 70,000. In the conclusion section stated that there is no peat, fragile or marginal soils in the operational area. The main type of soil is alluvial soil with good drainage with a class of S2 (Moderately Suitable). Most of the area of PT Swakarsa Sinar Sentosa is in the Land Class 2. A brief distribution of land survey areas is: class S2 : 16,353 ha, S3 : 424 ha, N : 73 ha.

The unit of certification has a slope map with a scale of 1; 100,000 (source: source: SRTM data (Shuttle Radar Topographic Mission Indonesia Sheet N01E116), which shows a flat area with a major contour of 2 meters, an intermediate contour of 2 meters, a minor contour of 2 meters. Based on document review and interviews with management representative, the unit of certification stated that there was no replanting and new planting on the sloped land.

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 company used by the company to arrange the block, roads, drainage, bridge, etc.

When the onsite audit ASA-1.1 and 1.2 were carried out, it was discovered that there were no new plantings and replanting. This is because the average yield in 2021 is 24.5 tons/ha.

Status: Comply

7.7

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

7.7.1, 7.7.2, 7.7.3, 7.7.4, 7.7.5, 7.7.6, 7.7.7

Based on certification unit Soil Map on Detailed Soil Survey document year of 2013 created by the Agro DSN Group R & E Department. Soil and land suitability classes are listed in the document and mapped in scale 1: 70,000. In the conclusion section stated that there is no peat, fragile or marginal soils in the operational area.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The company has implemented a water management plan consisting of:

- Do not apply chemicals in river border areas
- Do not dispose of liquid waste into the river but reuse it on plantation land. Before being used, the liquid waste is managed at the WWTP so that the quality meets the standards set by the government.
- Utilizing water for factory processing in accordance with the standards set by the company.
- Conduct river water quality testing.

Based on field observations on the Kenden River Border in Block B47 Afdeling 3 LJ 1 Estate and Block B 13 Afdeling 5 JB 1 Estate, it can be seen that the company has managed water sources by installing signboards with signboards as HCV areas and painting on palm trees as signs. spray limits, and planting timber plants on the river border even though the river border area is included in the planted area.

The company has a surface water quality monitoring program conducted every semester by an accredited laboratory (PT Sucofindo) on 27 August 2021. The monitoring location is on a river for the scope of the company's operational area, namely the Telen Hulu and Hilir Rivers. Currently the company is conducting surface water testing using quality standards that refer to PP 22 of 2021 Class II and East Kalimantan Regional Regulation No. 2 of 2011. The results of these tests will then be reported to the relevant Office through the RKL-RPL Report every semester.

			Telen River	
Parameter		Standard	Upstream	Downstream
BOD	mg/l	3* and 6**	2.72	2.94
TSS	mg/l	50* and 400**	2	5
pH	-	6 – 9	6.24	6.27
Oil dan Grease	mg/l	1	<0,01	<0,01

Note:

*: PP 22 Tahun 2021

**: Peraturan Daerah Kalimantan Timur Nomor 2 Tahun 2011.

Based on the test results, it is known that all parameters are in accordance with the provisions.

The company has also carried out monitoring well testing which was carried out on 27 August 2021 by the Laboratory (PT Sucofindo). The location of the test was carried out at Population Monitoring Wells, Application Land Monitoring Wells and Control Land Monitoring Wells. Based on the results of the verification of the test results, it is known that all monitoring well test parameters are in accordance with KEPMENLH Number 29 of 2003.

The results of observations and interviews with workers show that the company has also provided access to clean water for workers by providing hygienic water for drinking and water for daily needs.

7.8.2

Wet streams in the company area are protected by the company. This is evidenced by the results of field observations on the Kenden River Border in Block B47 Afdeling 3 LJ 1 Estate and Block B 13 Afdeling 5 JB 1 Estate, it can be seen that the company has managed the river border by installing signboards as HCV areas and painting on oil palm trees as a marker for spraying limits, and planting timber plants on the river border even though the river border area is included in the planted area. In addition, there are no traces of chemical application in the tributary border.

The river border that enters the planted area is protected by the company and the company has a policy not to carry out land clearing or replanting in the river border area as stated in the Land Clearing Work Instruction Number IK-AGR-OLP-01-R04 on October 1, 2019 which states that replanting is not carried out in HCV areas, including riverbanks. The results of interviews with company representatives revealed that river borders that entered the planted area at the time of replanting would not be replanted and the company carried out river border management in accordance with the Best Management Practice of river borders.

7.8.3

The company already has a permit for the use of liquid waste for Land Application (LA) with number 503/06/DPMPTSP-PPNP/LA/V/2019 based on the decision of the Head of the Investment and One Stop Service Office of East Kutai Regency with a validity period of 28 May 2019 for 5 years. The liquid waste permit explains that the liquid waste is used to irrigate an area of 800 hectares of plantation land located at Blocks F 33-43, E 35-43, and G 34-43.

The company can show a document of the results of measuring the quality of liquid waste that is applied to the land, namely the document of the results of testing liquid waste for the period February 2021 - April 2022. The test is carried out by a KAN accredited laboratory (LP-1182-IDN) using quality standards that refer to the Minister of Environment Decree No. 28 of 2003. Based on the results of the analysis of the test document, it shows that all the parameters tested are in accordance with the applicable quality standards. For example, the test results for the April 2022 period were BOD 342.84 (BM: <5,000) and pH 7.16 (BM: 6-9). In addition, the test results for the December 2021 period showed BOD 593.18 (BM: <5,000) and pH 7.08 (BM: 6-9).

Based on the results of field observations in the Land Application area of Block F42 Afdeling 12 LJ2 Estate, it is known that the location of the liquid waste application on the land is in accordance with the location stated in the Land Application permit, besides that there is no indication of overflowing liquid waste that is flowed. The results of observations at WWTP also found that liquid waste has been managed at WWTP, there is a pond to manage liquid waste, there is no indication of leakage and overflow in the WWTP pool and a flow meter to calculate the amount of liquid waste that flows into the application land is available and functioning properly.

7.8.4

The use of water for palm oil processing is listed in the water use record document for 2021-2022 which is recapitulated every month by the mill assistant. The complete recording of water use per ton of FFB is presented in the following table:

Period	FFB Process (Ton)	Water used (m ³)		
		Process	Budget (m3)	Rasio (M3/Ton FFB)
January 2021	22,551	15,376	45,000	0.68
February 2021	22,650	16,642	45,000	0.73
March 2021	25,670	16,046	45,000	0.63
April 2021	27,008	16,202	45,000	0.60
May 2021	22,680	16,670	45,000	0.69
June 2021	20,573	14,399	45,000	0.70
July 2021	22,174	16,412	45,000	0.74
August 2021	28,990	16,081	45,000	0.55
September 2021	31,869	15,015	45,000	0.47
October 2021	32,259	16,637	45,000	0.52
November 2021	30,572	16,759	45,000	0.55

December 2021	28,971	16,172	45,000	0.56
January 2022	26,516	16,697	45,000	0.63
February 2022	10,027	13,537	45,000	1.35
March 2022	24,247	15,150	45,000	0.62
April 2022	22,065	16,390	45,000	0.74

Based on water use data for the period 2021-2022, it is known that the water usage used by the company is below the water quota set.

The company can also show proof of payment for surface water for the period December 2021-February 2022 to the Regional Revenue Agency of East Kalimantan Province on March 25, 2021 via Bank BCA transfer with reference number 631349402. Payment has been in accordance with water usage and bills from the Regional Revenue Agency of East Kalimantan province.

Status: Comply

7.9

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

7.9.1

POM 4 has an Energy efficiency document in 2021 for the use of fossil fuels or the use of renewable fuels. The calculation of efficiency with the use of fossil fuels for the May 2021 - April 2022 period is concluded as follows:

FFB Processed as much as 300,944 tons using renewable fuels such as shells of 24,075 tons and fiber of 36,113 tons. The turbine produced from the use of Shell and Fiber is 10,715,580 Kwh or 35.60 Kwh/Ton FFB, while the generator used is 288,416 Kwh. The efficiency of renewable energy used by the company is 97.40%.

Status: Comply

7.10

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

7.10.1

The company also has conducted GHG emission calculations period 2021 use of Calculator Palm GHG version 4.0. Accurate data has been put into the RSPO PalmGHG Calculator (Palm GHG version 4.0) and has been verified. Summary of net GHG emissions from PalmGHG calculator of the audit report which calculation option is applied "Apply full Version".

Summary of Net GHG Emissions

Emission per product	tCO ₂ e/tProduct
CPO	0.09
PK	0.09

Production	t/yr
FFB processed	315,866.26
CPO produced	70214
PK produced	12770

Extraction	%
OER	22.23
KER	4.04

Land use	Ha
Planted area on mineral	21849.45
Planted on peat	0.00
Total area planted	21849.45
Conservation Area (Forested)	0.00
Conservation Area (Non-Forested)	490
FFB Production per hectare	23.94

Summary of field emission and Sinks

Description	Own crop		Group		3 rd Party	Total
Emissions Sources	tCO ₂ e	tCO ₂ e/ tFFB	tCO ₂ e	tCO ₂ e/ tFFB	tCO ₂ e	
Land conversion	71991.66	0.25	9878.01	0.36	0.00	81869.66
CO ₂ emissions from fertilizer	20759.28	0.07	3595.64	0.13	0.00	24354.92
NO ₂ emissions from peat	0.00	0.00	0.00	0.00	0.00	0.00
NO ₂ from Fertilizer	13169.62	0.05	1573.12	0.06	0.00	14742.74
Fuel consumption	3135.90	0.01	406.60	0.01	0.00	3542.50
Peat oxidation	0.00	0.00	0.00	0.00	0.00	0.00
Sinks						
Crop sequestration	-113683.44	-0.40	-13294.60	-0.49	0.00	-126978.04
Sequestration in Conservation area	0.00	0.00	0.00	0.00	0.00	0.00
Total	-4626.99	-0.02	2158.77	0.08	328.58	-2139.64

Summary Oil Mill Emissions and Credits

Remarks	tCO ₂ e	tCO ₂ e/t FFB
Emissions sources		
POME	7596.99	0.02
Fuel consumption	1787.85	0.01
Grid electricity	0.00	0.00
Credits		
Export of grid electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	9384.84	0.03

Palm Oil Mill Effluent (POME) Treatment

POME Treatment	Unit	Value
POME Produce	t/yr	212420.06
CH ₄ (Total)	t/yr	341.44
Applied N in POME	t/yr	95.59
Total N ₂ O emission from POME	tCO ₂ e/yr	0,64
POME Diverted to Compost	%	0
POME Diverted to anaerobic digestion	%	100
• POME to anaerobic pond	%	0
• POME to methane capture (flaring)	%	22
• POME to methane capture (electricity generation)	%	78

The audit team has verified the GHG palm that has been carried out by the company. Based on the verification results, it is known that the GHG palm input data is in accordance with the actual conditions. This is evidenced by the results of verification of the amount of FFB production from Estate JB1, LJ1, and LJ 2, planted area of Estate JB1, LJ1, and LJ 2 and the distribution of planting years, as well as the area of HCV. The difference between the HCV area in Palm GHG and the area statement data is caused by the area statement from Estate Jabdan 2 which is outside the scope of being included in the GHG calculation.

7.10.2

Based on the 1998 AMDAL document and historical documents of plantation land use such as maps and other company documents, planting activities at PT Swakarsa Sinarsentosa began in 1996 and were completed in 2004. Until the ASA 1.1 + ASA 1.2 activities were implemented, there were no new planting activities or new land clearing above 15 November 2018.

7.10.3

Based on document review and interviews with company representatives, it was found that there were no new developments. The company has identified sources of pollution in the mills and estates, the documents inform the sources (stations/activities), sources of pollution and emissions, impacts (humans, work equipment, environment) and impact control. For example, from the boiler it produces boiler ash, steam and chemical pollution, from the engine room it produces pollution in the form of noise.

Efforts to reduce pollutants carried out by the company include:

- Monitoring air quality and emissions from boilers and generators
- Manage POME in WWTPs before use in plantations
- Utilizing POME for Methane Capture which generates electrical energy.
- Perform regular machine maintenance.
- Optimizing the use of fertilizers according to recommendations
- Use of fiber and shells in Mills to reduce diesel fuel.

The company has tested emissions from boilers and generators, as well as ambient air quality which was carried out in semesters 1 and 2 of 2021 by the PT Sucofindo laboratory. Based on the results of the document review, it is known that the results of the tests carried out are in accordance with the provisions set by the Government.

The company also has mitigation as an effort to reduce GHG emissions, such as:

- Use of fiber and shells for boiler fuel as a substitute for fossil fuels
- Application of empty fruit space that aims to reduce the use of fertilizers
- Conduct environmental emission testing to determine repair schedule
- Prohibition of burning waste for residential areas.
- Socialization of saving electricity use
- Planting trees that are useful for capturing carbon gas produced from factories
- Perform regular vehicle repairs and monitoring.

Status: Comply

7.11

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

7.11.1

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

Based on the results of document verification and the results of field visits during the audit activity, it was found that there were no new land clearing and replanting activities carried out by the company. In addition, there were no traces of burning on the plantation land and there was a warning sign prohibiting burning land.

7.11.2

In determining land fire prevention and control measures, the company carries out several activities, namely:

- Fire emergency response simulation training for employees, for example on August 13, 2021 (LJ 1&2 Estate), and August 5, 2021 (JB 1 Estate) which was attended by the Estate Fire Task Force.
- The company has an emergency response team to handle fire emergencies. The company already has an emergency response team for each estate and factory.
- Have facilities and infrastructure for emergency response prevention and management of land fires.
- Socializing land fires to the surrounding community, for example on August 24, 2021 in Deabeq Village and on August 19, 2021 in Benhes Village, which was attended by 34 communities around the company.
- Monitoring land fires through fire patrols, hot spots (hotspots), and through fire towers which are carried out every day. For example, the results of fire monitoring for the December 2021 period revealed that there were no hotspots in the company area.

The auditor team has also carried out fire control simulations for the fire task force teams at Jabdan 1 Estate, LJ 1 Estate, and LJ 2 estate and tested the fire control facilities and infrastructure owned by the company. The simulation results show that the Company's fire team can run the simulation well and fire fighting equipment can be used at any time.

7.11.3

The company has also involved stakeholders in adjoining locations for fire prevention and control measures by conducting socialization of land fire control to the community, for example on August 24, 2021 in Deabeq Village and on August 19, 2021 in Benhes Village, which were attended by 34 communities around the company. The results of interviews with representatives of the village community around the company revealed that the company had socialized fire control to the community. In addition, in the company area there is also a signboard prohibiting land burning activities and the dangers of land fires.

Status: Comply

7.12

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

7.12.1

Based on the 1998 AMDAL document and historical documents on plantation land use such as maps and other company documents, planting activities at PT Swakarsa Sinarsentosa began in 1996 and were completed in 2004. Until the Surveillance 1.1 + 1.2 audit activity was carried out, there were no new planting activities or new land clearing above 15 November 2018.

7.12.2

The company has identified the HCVs listed in the Final High Conservation Value Assessment report for the Dharma Satya Nusantara Group in Muara Wahau Subdistrict, East Kutai Regency in January 2012. The scope of the HCV assessment is all the plantations of the DSN Group including PT Swakarsa Sinar Sentosa and the assessment was carried out by Daemeter Consulting with RSPO Approve Assessor.

The area of PT SWA consists of 4 estate namely JB1 Estate, JB2 Estate, LJ1 Estate and LJ2 Estate. For conservation area PT SWA consists of 3 (three) areas, namely:

- Conservation Area of Block VI, with an area of 325 Ha located in JB1 and JB2 Estate adjacent to the east with Long Kejiak 1 Estate (PT DIN)
- The conservation area of block VII, with an area of 165 Ha located in JB2 Estate
- Riparian Kenden Kecil River, with an area of 132 Ha where the upstream flow comes from Puhus 2 Estate (PT DAN), crossing JB1, LJ1, JB2 and LJ2 Estate, and its flow to Wahau River (outside HGU)

For scope audits POM 4 and supply base (JB1, LJ1, and LJ2 Estate), areas CH with HCV are:

- Conservation area VI covering an area of 325 Ha in JB 1 Estate.
- Riparian Kenden Besar River is included in the planted area of 30.60 Ha in JB1 Estate.
- Riparian Kenden Kecil River is included in the planted area of 20.60 Ha in LJ1 estate.
- Riparian Kenden Kecil River is included in the planted area of 5.59 Ha in LJ2 Estate.
- Riparian Long Sengat River is included in the planted area of 13.03 Ha in LJ2 Estate.

Based on document verification, it is known that PT Swakarsa Sinar Sentosa is not required to conduct an HCS study because there is no new land development after November 2018.

7.12.3

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

7.12.4

The company already has a HCV management plan for 2021-2022 based on the results of a review of the previous year's management plan and the results of consultations with local communities on July 28, 2021. The HCV management plan for 2021-2022 includes:

- Biodiversity management
- Safeguarding conservation areas
- Provision of restoration/Enrichment plant seeds
- Conservation area enrichment
- Riparian area management (restoration)

- Conservation socialization
- Control of wildlife conflicts
- Reporting

The company has also carried out a management review of High Conservation Value Areas which was carried out on July 28, 2021. This activity was carried out to analyze the opportunities and challenges of the identified potential HCVs in the hope that they will be input for the next HCV management plan. These activities are carried out by involving stakeholders such as the surrounding village community and employees.

An integrated management plan has been developed in consultation with relevant stakeholders and includes directly managed areas and broader and relevant landscape level considerations. This is evidenced by the company's HCV management plan which was developed by involving stakeholders such as the surrounding village community and employees. Management activities planned by the company also include areas that are managed directly and take into account the wider landscape such as maintaining the presence of HCV, anticipating land fires in the company area and in the area around the company, increasing employee and community knowledge by conducting HCV socialization.

The company can show some implementation of the HCV management and monitoring plan for the period 2021, for example:

- Routine monitoring in an effort to prevent area encroachment, tree cutting, animal hunting and fires carried out on December 4, 2021 in the Kenden River Border area and HCV Block IV. Monitoring results revealed that there was no encroachment, tree cutting, animal hunting and fire activities.
- Monitoring and maintenance of Conservation Boundaries conducted on 21 September 2021 in the HCV Block IV area.
- Provision of 300 tree seedlings for rehabilitation activities on August 5, 2021.
- Rehabilitation activities in riparian/river areas carried out on 29 July 2021 at the Kenden Kecil River border and on 30 July 2021 at the Kenden Besar River border with 80 trees of Ulin, Guava, Meranti, Mata Cat and mixed crops.
- Socialization of HCV including the presence of animals to employees which was conducted on 27 and 29 April 2021.
- Socialization of the HCV including the presence of animals to the surrounding community which was carried out on February 24, 2021.
- Monitoring of Animals in the HCV area which is carried out every month. Based on the results of animal monitoring, it is known that during 2021 several types of animals were found, such as the *Rangkong Badak* (*Buceros rhinoceros*), *Elang Tikus* (*Elanus caeruleus*), *Punai Baku* (*Treron fulvicolis*), *Lutung Merah* (*Presbytis rebicunda*), *Kipasan Belang* (*Rhipidura javanica*), and *Pekakak Emas* (*Pelargopsis capensis*).

7.12.5

Based on interviews with HCV PICs and previous assessments it was found that no traditional rights were used for the company's operational areas. All of the company's operational areas come from former private logging concessions (HPH) which have been issued by the Minister of Forestry. All of the company's HCV areas are within the company's HGU.

Based on interviews with representatives of surrounding villages, it is known that there is no overlap between the company's land and the community.

7.12.6

The company has a program to educate the workforce about RTE species status. This program is also included in the Company's HCV management plan. The program includes activities to increase knowledge and skills (for all plantation staff and employees, especially special officers tasked with managing HCV and monitoring important species, especially endangered species).

The company routinely conducts socialization to the community and workers in the company regarding the existence of endangered plants and animals, which is carried out in conjunction with the socialization of HCV areas, for example:

- Socialization of HCV including the presence of animals to employees which was conducted on 27 and 29 April 2021.
- Socialization of the HCV including the presence of animals to the surrounding community which was carried out on February 24, 2021.

Based on interviews with harvesting and spraying officers at LJ 1 Estate, LJ 2 Estate, and JB 1 Estate, it is known that the company prohibits workers from maintaining protected animals and plants and is prohibited from catching, hunting, and killing animals as well

as prohibiting the destruction of HCV areas. In addition, as an indirect form of socialization, the company installed sign boards prohibiting hunting and catching animals in strategic places such as the Estate Office, company entrances, in HCV areas, and employee housing.

7.12.7

Monitoring the status of HCV and RTE Species is carried out every month by the company and will be evaluated every 3 months. The company can show the evaluation records for 2021 every 3 months, namely Quarter 1, 2, 3 and 4. For example, the following is a recording of the evaluation for Quarter 4 2021 which was carried out in January 2022. The results of the evaluation of monitoring the status of HCV and RTE species in 2021, namely:

- The renewal of the permanent Conservation Sign has not been carried out due to problems in the DokFlow system. In the system there is no code for the work on the Permanent Conservation Sign. The solution is to contact the Proquerment (HO) department to include these activities in DokFlow, after that follow the ordering process according to the proper stages.
- The results of the disturbance patrol in the HCV area for the period 2021 revealed that there was no disturbance in the HCV area. In addition, there are no hunting and catching activities for animals carried out by the community and employees.
- To anticipate the existence of animal conflicts, it is necessary to hold training on handling animal conflicts for HCV officers and animal conflict training activities should be included in the HCV work program.

Based on the evaluation results, it is known that the implementation of HCV area management is going quite well. The follow-up to the evaluation results will be used as input for the management and monitoring of the HCV area in the next period. The results of interviews with the company's PIC, the results of the evaluation carried out will be used as input for the implementation of monitoring HCV and RTE Species for the next period.

7.12.8

Based on environmental document, history of land use and area statement, known the company planted 1996 finished on 2004. Until recertification audit conducted, no new planting activities above 15 November 2018.

According to AMDAL documents, HCV documents and the use of plantation areas history documents such as maps and other corporate documents, planting activities at PT Swakarsa Sinarsentosa started in 1996 and completed in 2004. The management unit has not expanded or re-established the plantation. For planting in 2011 in LJ2, is the ex-nursery area that are not used again so that the planting is conducted on 2011. The Unit Certification has reported Liability disclosure to the RSPO Secretariat on April 23, 2015.

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	POM 4 of PT Dharma Satya Nusantara did not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	✓
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or ✓
ASA-1.1 & ASA-1.2	POM 4 of PT Dharma Satya Nusantara did not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	✓
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or ✓
ASA-1.1 & ASA-1.2	POM 4 of PT Dharma Satya Nusantara did not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	✓
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or ✓
ASA-1.1 & ASA-1.2	POM 4 of PT Dharma Satya Nusantara did not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

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

PT Dharma Satya Nusantara Time Bound Plan is explained in table 1.10. PT Dharma Satya Nusantara has six ten (16) management units with ten (10) mills. PT Dharma Satya Nusantara has informed the Time Bound Plan progress, MUTU has considered that PT Dharma Satya Nusantara is complied with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by PT Dharma Satya Nusantara on 2022 and signed by Head of Sustainability.

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

MUTU Auditor has verified company partial certification and concludes that:

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>PT Dharma Satya Nusantara Tbk has carried out self-assessment (e.g., internal audit) against uncertified management units and submitted self-assessment reports year 2021. Self-assessment against uncertified management units as follow: PT Karya Prima Agro Sejahtera on 2 – 4 June 2021, PT Mitra Nusa Sarana on 7 – 10 June 2021, PT Bima Palma Nugraha on 10 – 12 June 2021, PT Bima Agri Sawit on 14 – 16 June 2021, PT Dharma Inti Sawit Lestari on 15 – 18 June 2021, PT Dharma Persada Sejahtera on 14 – 16 June 2021, PT Kencana Alam Permai on 21 – 23 June 2021, PT Prima Sawit Andalan on 21 – 23 June 2021, PT Pilar Wanapersada on 21 – 23 June 2021 and PT Putra Utama Lestari on 18 – 20 November 2021.</p> <p>Auditor Verification The company has conducted an internal audit for the uncertified unit and has a positive assurance statement.</p>
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)	<p>The entire companies under PT Dharma Satya Nusantara Tbk (DSN Group) have conducted HCV assessment. Uncertified management units have conducted HCV assessment and HCS assessment such as:</p> <ul style="list-style-type: none"> – PT Dharma Persada Sejahtera located in Sintang District, Kalimantan Barat Province has HCV assessment on March 2012 by PT Sonokeling Akreditasi Nusantara – PT Dharma Intisawit Lestari located in Bulungan District, North Kalimantan Province has HCV assessment on January 2013 by PT Daemeter Consulting – PT Karya Prima Agro Sejahtera located in Kutai Timur District; Kalimantan Timur Province has HCV assessment on July 2013 by PT Daemeter Consulting

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> – PT Bima Palma Nugraha located in Kutai Timur District, Kalimantan Timur Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat year 2020 and LUCA has passed. Concept note is on process. – PT Bima Agri Sawit located in Kutai Timur District, Kalimantan Timur Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat year 2020 and LUCA has passed. Concept note is on process. – PT Dharma Intisawit Lestari located in Bulungan District, North Kalimantan Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat and LUCA has passed with the result of liability assessment is 79.60 ha. It has been implemented. – PT Putra Utama Lestari located in Mahakam Hulu and West Kutai District, Kalimantan Timur Province: LUCA and disclosure of non-compliant land clearing was available and it had been submitted to RSPO secretariat and LUCA has passed with liability 3 ha. Concept note is on process. – PT Pilar Wanapersada located in Lamandau District, Central Kalimantan Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat and LUCA has passed with liability 1,483.50 ha. Concept note is on process. – PT Agro Andalan (AAN) located in Sekadau District, Kalimantan Barat Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat and LUCA has passed with liability 46.10 ha. Concept note is on process. – PT Dharma Persada Sejahtera located in Sintang District, Kalimantan Barat Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat year 2020 with the result of liability assessment is zero. – PT Prima Sawit Andalan located in Sintang District, Kalimantan Barat Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat year 2020 with the result of liability assessment is zero. – PT Kencana Alam Permai located in Sintang District, Kalimantan Barat Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat year 2020 with the result of liability assessment is zero. – PT Mitra Nusa Sarana (MNS) located in Sintang District, Kalimantan Barat Province: LUCA has been PASS and concept note on process. <p>Auditor Verification:</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		Based on auditor verification, not all uncertified unit conduct new clearing after Nov 2005, but for uncertified unit with land clearing after Nov 2005 has follow RaCP.
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Based on auditor verification, not all uncertified unit conduct new clearing after January 2010 but for all uncertified unit with land clearing after January 2010 has follow NPP. Detail information of uncertified unit are:</p> <ul style="list-style-type: none"> PT Bima Agri Sawit (PT BAS), PT Mitra Nusa Sarana (PTMNS), PT Agro Andalan (PT AAN) and PT Bima Palma Nugraha (PT BPN) have conducted NPP verification by CB. Result of NPP verification can be seen on RSPO website PT Dharma Satya Nusantara Tbk has proposed a new development plan for its concession that covers an area of 742.39 ha located inside its operational area in PT Bima Agri Sawit (PT BAS) management unit. The plantation properties are in the Desa Baay and Karangan Seberang, Karangan Subdistrict, Kutai Timur District, Kalimantan Timur Province, Indonesia. The NPP verification of PT BAS was conducted by PT TUV Rheinland auditors through document verification and an on-site visit. A preliminary document review was conducted on 14 October 2020 remotely followed by field verification on 4 December 2020. The Summary report of this area is now undergoing 30 days of public notification as required by the RSPO New Planting Procedure 2015 beginning from 25th May 2021 - 24th June 2021. (https://www.rspo.org/certification/new-planting-procedure/public-consultations/pt-dharma-satya-nusantara-pt-bima-agri-sawit-pt-bas) PT Dharma Satya Nusantara has proposed a new development plan for its concession that covers an area of 7,392 ha located inside its operational area in PT Mitra Nusa Sarana (PT MNS) management unit. The plantation properties are in the Ketungau Hulu and Central Ketungau Sub District, Sintang District, Kalimantan Barat Province, Indonesia. The NPP verification of PT MNS was conducted through document and field verification. TUV Rheinland auditor conducted a preliminary document review on 30 March 2020. This was followed up with a field verification visit to the proposed new planting area on 27-28 July 2020. The Summary report of this area is now undergoing the 30 days public notification as required by the RSPO New Planting Procedure 2015. (https://www.rspo.org/certification/new-planting-procedure/public-consultations/pt-dharma-satya-nusantara-pt-mitra-nusa-sarana-pt-mns) PT Dharma Satya Nusantara has proposed a new planting area located in Tapang Perodah, Nanga Pemubuh, Setawar, Boti, Sungai Sambang, Mondri, and

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Nanga Menterap village, Sekadau Hulu subdistrict, Sekadau district, Kalimantan Barat Province, Indonesia. The summary report of PT Agro Andalan (PT AAN) New Planting Assessment is now open for</p> <ul style="list-style-type: none"> Public comments for 30 days as required by the RSPO New Planting Procedure 2015. (https://rspo.org/certification/newplanting-procedure/public-consultations/pt-dharma-satya-nusantara-ptagro-andalan-pt-aan) PT Dharma Satya Nusantara has proposed a new development plan for its concession that covers an area of 286 ha located inside its operational area in the PT Bima Palma Nugraha (PT BPN) management unit. The plantation proper ties are located in the Desa Tepian Langsat, Desa Tebangan Lembak, Desa Tepian Indah and Desa Tepian Raya, Benganlon subdistrict, Kutai Timur district, Kalimantan Timur province, Indonesia. The NPP verification of PT BPN was conducted through document verification and on-site visit. TUV Rheinland auditor conducted a preliminary document reviewed on 08 February 2021 by remote (virtual process). This is followed up with onsite visit verification to the proposed area for a new planting site on 28-29 April 2021. The Summary report of this area is now undergoing 30 days of public notification as required by the RSPO New Planting Procedure 2015 beginning from 16th June 2021 until 15th July 2021. (https://rspo.org/certification/new-planting-procedure/public-consultations/pt-dharma-satya-nusantara-pt-bima-palma-nugraha-pt-bpn) <p>Auditor Verification: Based on auditor verification, not all uncertified unit conduct new clearing after January 2010 but for all uncertified unit with land clearing after January 2010 has follow NPP.</p>
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p>Uncertified management units have procedure for land conflict No. SOP-AGR-058-R03 (Prosedur Ganti Rugi Lahan) and No. SOP-AGR-007-R00 (Prosedur Penanganan Konflik).</p> <p>Based on self-assessment there is no land conflict in the location of uncertified management units. Uncertified management units (PT Mitra Nusa Sarana, PT Dharma Persada Nusantara and PT Agro Andalan) provided evidence related land compensation process such as:</p> <ul style="list-style-type: none"> ID card Document of land ownership Statement letter about right of land Map of land compensation Minute of land checking Agreement of land compensation (GRTT) price

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> - Agreement of land compensation - Agreement of land clearance - Statement letter of hand over of land compensation - Payment slip - Documentation of hand over of land compensation (photo-graph). <p>Based on status of complaints on the RSPO website (https://askrspo.force.com/Complaint/s/casetracker) there is no complaint for PT Dharma Satya Nusantara Tbk (DSN Group).</p> <p>Auditor Verification: Based on the auditor's search through news from the internet, no information on land conflicts was found in the above uncertified management unit.</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p>Based on self-assessment of uncertified management units (PT Karya Prima Agro Sejahtera, PT Mitra Nusa Sarana, PT Bima Palma Nugraha, PT Bima Agri Sawit, PT Dharma Inti Sawit Lestari, PT Dharma Persada Sejahtera, PT Kencana Alam Permai, PT Prima Sawit Andalan, PT Pilar Wanapersada and PT Putra Utama Lestari), and desk study on internet that there is no labour dispute issue since last year period until the partial audit conducted on 8 – 9 December 2021.</p> <p>Auditor Verification: There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p>
2.1.6	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1 (it has changed be Criterion 4.2 in P&C 2018).	<p>Uncertified management units have list of legal and other requirements presented in list of regulation and law covering plantation, OSH, labor, and environmental sections. The law and regulation are including relevant laws, government regulations, Instruction of President, Minister Regulations, Local Regulations, and Governor Regulations etc. All copies of law and regulations are available and maintained. Uncertified management unit has a record of list and regulation document, already mentioned regulation and law should to be fulfilled by management unit.</p> <p>There is a procedure of identification of laws and other legal requirements, No. SOP-AGR-024-R01. The procedure mentioned identification, source of information, personnel in charge and distribution of legal requirement.</p> <p>Uncertified management units have established a system for tracking any changes in the law. In Procedure of identification of laws and other legal requirements mentioned that SHE/HCD/HCO/Legal department head/legal department conduct updating requirement every 6 months. The source of the information is internet, newspaper and government agencies. Implementation of this procedure is mentioned in report of</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Summary of Evaluation of Compliance against Laws and Regulations (<i>Ringkasan Evaluasi Kepatuhan terhadap Peraturan Perundangan</i>), document No DK-MS-01A-R01, issued on January 2021.</p> <p>Evidence of regulation compliance from uncertified units such as land use right/ land title, environmental permit, business plantation permit, report of environmental management & monitoring plan year 2021 which has been submitted to government agency etc.</p> <p>Based on self-assessment reports that some of PT Dharma Satya Nusantara's uncertified management units have not comply with legal requirement relates of Land Use Right (HGU) on behalf PT Karya Prima Agro Sejahtera (East Kalimantan Province), PT Putra Utama Lestari (East Kalimantan Province), PT Dharma Persada Sejahtera (West Kalimantan Province), PT Prima Sawit Andalan (West Kalimantan Province) and PT Mitra Nusa Sarana (West Kalimantan Province) where the current status is on process at Land Agency (BPN).</p> <p>Auditor Verification: Based on auditor verification, there is still progress in obtaining legality documents for the uncertified units so that PT Dharma Satya Nusantara has included the certification plan for the uncertified units in the timebound plan.</p>

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

3.4.1. Identification of Findings, Corrective Actions and Observations at Recertification

NCR No.	:		Issued by	:	
Date Issued	:		Time Limit	:	
NC Grade	:		Date of Closing	:	
Standard Ref. & Requirement	:				
Evidence observed (filled by auditor):					
Non-Conformance Description (filled by auditor):					
<i>No Non-Conformance were found in this audit activity</i>					
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 at ASA-1.1 Remote Audit

NCR No. :		Issued by :	
Date Issued :		Time Limit :	
NC Grade :		Date of Closing :	
Standard Ref. & Requirement :			
Evidence observed (filled by auditor): Non-Conformance Description (filled by auditor): <i>No Non-Conformance were found in this audit activity</i>			
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. Identification of Findings, Corrective Actions and Observations at ASA-1.1 & ASA-1.2 Onsite Audit

NCR No.	:	2022.01	Issued by	:	Hasiholan Sihombing
Date Issued	:	23 May 2022	Time Limit	:	21 August 2022
NC Grade	:	Major	Date of Closing	:	19 August 2022
Standard Requirement	Ref. & :	6.7.3 Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.			
Evidence observed (filled by auditor): <ul style="list-style-type: none"> The company has a procedure regarding employee PPE (No. SOP-AGR-072-R00, dated September 01, 2016) which includes the determination, procurement, and evaluation of PPE, as well as estate PPE standards. Then there is Memorandum No. 002/DIR/JKT/II/17 from the Operations Director, dated February 13, 2017 regarding the enforcement of discipline in the use of PPE in the work environment which confirms that employees are required to wear PPE when doing their work in accordance with Company Regulations and SOPs regarding OHS. Then replace the damaged PPE by submitting the damaged PPE to the warehouse officer to be replaced with a new one. Then on the POM PPE Matrix, updated on January 12, 2018, it is known that the shoes used in the POM 4 area are safety shoes for workers, contractors, and guests. The results of field observations and worker interviews at the Sortation, Tipler, Engine Room, Boiler, and Kernel POM 4 stations revealed that 6 workers used rubber boots and 1 worker wore safety shoes which he bought himself, with the explanation: <ul style="list-style-type: none"> a. Dominant because the safety shoes distributed by the company have been damaged. b. Understanding of replacement if safety shoes are damaged: <ul style="list-style-type: none"> - Dominant understands that if the replacement period is not yet available then you have to buy your own and the cheapest option is to use rubber boots. - There are workers who have reported, but received information that there is no stock of safety shoes. - Some workers stated that the use of rubber boots was already known to their superiors. 					
Non-Conformance Description (filled by auditor): <p>Based on this evidence, the Company has not fully demonstrated the implementation of the provision of Personal Protective Equipment (PPE) which is provided free of charge to all workers in the workplace in accordance with the procedures and memorandums that it has.</p>					
Root Cause Analysis (filled by organization audited): <ol style="list-style-type: none"> The mill workers do not fully understand the implementation of the provision of Personal Protective Equipment (PPE) The workers superiors do not understand the PPE standards used in certain work locations Socialization has not been carried out routinely and more intensively. The workers superiors do not know the update of PPE stock data in the warehouse 					
Correction (filled by organization audited): <ol style="list-style-type: none"> The damaged safety shoes of workers have been replaced. There is a stock of safety shoes in the warehouse. Re-socialization for all levels of positions in POM 4 related to the application, provision, and supervision of the use of PPE. 					
Corrective Action (filled by organization audited): <ol style="list-style-type: none"> Re-socialization for all levels of positions in POM 4 related to the application, provision, and supervision of the use of PPE. Socialization of PPE standards and supervision is carried out periodically every month through morning rollcall. 					

2. Evaluation of employee understanding related to the application, provision, and supervision of the use of PPE, especially carried out directly by the POM 4 OHS and Environmental PIC.
3. Monitoring stock of safety shoes and PPE in POM 4.
4. Monitoring the use of safety shoes is carried out at the gate and supervised by security.
5. POM 4 OHS and Enviromental PIC conducts PPE patrols periodically.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification July 25, 2022

The company shows evidence of improvement, namely:

1. Minutes of socialization of the understanding of the mechanism for changing PPE, the use of PPE, and the completeness of PPE on May 25, 2022. The socialization materials include the mechanism for changing PPE, the use of PPE in the work area, and the completeness of PPE. The company also shows the level of understanding of workers regarding the socialization with the conclusion that workers understand. The socialization was attended by 93 POM workers, consisting of weighbridge operator, process operator, kernel operator, etc.
2. Minutes of socializing the understanding of the mechanism for changing PPE, using PPE, and completeness of PPE on May 25, 2022 to security. The socialization materials include the mechanism for changing PPE, using PPE in the work area, completeness of PPE, and monitoring the use of PPE. Security is in charge of being the initial supervisor of the completeness of PPE, especially the use of safety shoes by workers when entering the work area. The company also shows the level of understanding of workers regarding the socialization with the conclusion that workers understand.
3. Documentation of replacement of damaged PPE to 8 workers at POM on May 25, 2022.
4. Documentation of stock photos of PPE such as leather gloves, safety shoes, ear plugs, etc.

Conclusion July 25, 2022

The company still has to explain the Auditor's comments in the root cause analysis, correction, and corrective action. Based on this, the non-conformance is declared not fulfilled.

Auditor Verification August 18, 2022

The company shows additional evidence of improvements in the form of:

1. Minutes of socialization of understanding of the mechanism for changing PPE, use of PPE, and completeness of PPE on 25 June 2022 to workers. The socialization was attended by 86 workers from administration, weighbridge, laboratory, and production. The company shows an evaluation of the understanding of the socialization participants with the conclusion that the workers have understood the socialization material.
2. Minutes of socializing the understanding of the mechanism for changing PPE, using PPE, and completeness of PPE on July 23, 2022 to workers. The socialization was attended by 87 workers from administration, weighbridge, laboratory, and production. The company shows an evaluation of the understanding of the socialization participants with the conclusion that the workers have understood the socialization material.
3. Minutes of socialization of understanding of the mechanism for changing PPE, use of PPE, and completeness of PPE on July 25, 2022 to staff. The company shows an evaluation of the understanding of the socialization participants with the conclusion that the workers have understood the socialization material.
4. Monitoring of PPE Stock as of July 2022 at POM.
5. OHS work programs in the form of:
 - Socialization of the mechanism for replacing PPE every month
 - Socialization of the use of PPE in the Work Area every month
 - Socialization of the completeness of PPE every month
 - Socialization on the use of PPE every month

The company still has to explain the Auditor's comments in the correction and corrective actions. Based on this, the non-conformance is declared not fulfilled.

Auditor Verification August 19, 2022

The company has re-explained root cause analysis and preventive measures. Based on this, the discrepancy in this indicator can be declared **Fulfilled**.

Verified by	:	Hasiholan Sihombing
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NCR No.	:	2022.02	Issued by	:	Rahmat Abdiansyah
Date Issued	:	23 May 2022	Time Limit	:	ASA 1.3
NC Grade	:	Minor	Date of Closing	:	11 August 2022
Standard Ref. & Requirement	:	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.			

Evidence observed (filled by auditor):

- Document identification of sources of waste and pollution of the Estate on January 2, 2022 which explains that the waste generated from fertilization activities is sacks of used fertilizers and inner fertilizers with pollution risk control that is carried out is collected and if it will be reused, do the washing in the wash house, and the inner fertilizer is dumped into the Landfill after washing it clean. The inner fertilizer is not included in the toxic waste category according to a letter from the East Kutai Regency Environmental Service regarding technical directions with Number: 660/1589/DLH-4.3/XI/2019 on November 22, 2019.
- The Technical Instructions for Handling used fertilizer sacks that were stipulated on January 10, 2021 explained that the sacks (including the inner fertilizer) that had been collected from the block were neatly placed in the Wash House.
- The results of field visits to Estate JB1, Estate LJ1, and Estate LJ2 found several inner fertilizers that were not placed in the Wash House in accordance with the company's technical instructions. The locations where the inner fertilizer was found are as follows:
 - Estate JB 1: Blok A15 and A21 (Afdeling 1), B24 and B25 (Afdeling 4).
 - Estate LJ 1: Blok B35, B36, B37 (Afdeling 2), B46 (Afdeling 3) and C28 (Afdeling 6)
 - Estate LJ 2: Blok F47 (Afdeling 12)
- The results of the field visit at wash house Estate JB 1 and LJ 1 revealed that there is no inner fertilizer stored and there is also no place for inner fertilizer collection.

Non-Conformance Description (filled by auditor):

Based on the above evidence, the handling of the inner fertilizer waste carried out by the company is not in accordance with the technical instructions for handling the used fertilizer sacks owned by the company.

Root Cause Analysis (filled by organization audited):

Inner fertilizer management has not been understood by all employees who work in the fertilizer application section in the field. Inner fertilizer management socialization has not been carried out to employees who work on fertilizer application.

Correction (filled by organization audited):

All used sacks and inner fertilizers are cleaned using running water and stored in the washing house.

Corrective Action (filled by organization audited):

- PT Swakarsa Sinarsentosa has issued the Technical Guidelines for Handling Used Fertilizer Sacks on January 10, 2021.
- Socialization of Technical Guidelines for Handling Used Fertilizer Sacks is carried out periodically every month through morning apples.
- The results of the socialization were evaluated directly by the K3L assistant using the question and answer method.
- Monitoring of ex-fertilizer sacks was made at the Wash House.

Assessor Evaluation and Conclusion (filled by auditor):
Auditor Verification July 25, 2022

- The company has sent proofs of repairs in the form of:
- Minutes of Socialization of the Treatment of former sacks of fertilizer which was held on 28 May 2022, 4 June 2022, and 11 June 2022 at Estate LJ1, LJ2, and Jabdan 1 which was attended by 130 workers.
- Socialization material in the form of Technical Instructions for Handling used fertilizer sacks which has been known by the Plantation

Head of PT SWA.

- Documentation of Ex-Sack Fertilizer Treatment activities, for example at Estate LJ 1 Afd III starting from taking from the field, arranging, placing in the wash house, cleaning, and placing in the provided place (shelf).
- The balance sheet for ex sacks of fertilizer, for example, for the JB 1 estate on April 16, 2022, has received 1,794 sacks from the estate which was handed over to the wash house.
- Root cause analysis, Correction, and Corrective action. However, there are still some auditor comments that must be corrected by the company as described in the Root of the problem, correction, and corrective action column.

Based on the explanation above, the discrepancy in this indicator is declared **Unfulfilled**.

Auditor Verification August 10, 2022

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

- The program for the socialization of the handling of ex-fertilizer sacks and inner fertilizers for the 2022 period.
- Documentation and attendance of socialization activities on the handling of inner and ex-fertilizer sacks on 28 May 2022, 4 June 2022, and 11 June 2022 at Estate LJ1, LJ2, and Jabdan 1.
- Documentation of Ex-Sack Fertilizer Treatment activities, for example at JB 1 Afd II Estate, starting from taking from the field, arranging, placing in the wash house, cleaning, and placing in the provided place (shelf).
- Root cause analysis, Correction and Corrective Action. However, there are still auditor questions that must be answered by the company in Corrective Action to ensure that the root of the problem does not occur again in the next assessment.

Based on the explanation above, the discrepancy in this indicator is declared **Unfulfilled**.

Auditor Verification August 11, 2022

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

- Technical instructions for handling used fertilizer sacks
- Refreshment socialization regarding the treatment of former fertilizer sacks to employees at Long Geneva 1 Estate, Long Geneva 2 Estate and Jabdan 1 Estate on 28 May, 4 June and 11 June 2022.
- Monitoring and reports on washing used fertilizer packaging
- Examples of documentation in the form of photos regarding the treatment of former fertilizer sacks by employees.
- Analysis of root causes and explanation of preventive actions against non-conformities that arise.

Based on the evidence of improvement, root cause analysis and preventive actions described, the non-conformance in this indicator can be declared **Fulfilled**.

Verified by	:	Rahmat Abdiansyah / Hasiholan Sihombing
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3.4.4. Opportunity for Improvement

No	Ref. Std.	Description
1	2.1.1	<p>The unit of certification complies to relevant regulations.</p> <p>Based on document verification, it is known that the Company already has a water extraction permit based on the Decree of the Minister of Public Works and Public Housing No. 585/KPTS/M/2016 dated 26 October 2016 concerning the Granting of a Surface Water Concession Permit to PT DSN which is valid for 5 years. The validity period of the permit has expired. The company can show a technical recommendation for the exploitation of PT Dharma Satya Nusantara's water resources with number SA 0203-Bws/10/216.10 on 17 November 2021 from the Ministry of Public Works and Public Housing, Directorate General of Water Resources, Kalimantan IV Samarinda. The technical recommendation explains that within 60 calendar days from the issuance of the technical recommendation, the company must apply for a surface water exploitation permit. The company has applied for a water resources concession permit for industrial activities at PT Dharma Satya Nusantara (PKS 4) to the minister of public works and public housing Cq. Directorate General of Water Resources, Ministry of Public Works and Public Housing on November 29, 2021. However, until the ASA 1.1 + 1.2 assessment activity was carried out, the permit had not yet been issued from the Ministry of Public Works and Public Housing.</p> <p>The company has the opportunity to ensure the issuance of an extension of the surface water concession permit from the Ministry of Public Works and Public Housing.</p>
2	3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.</p> <p>The company shows the RSPO Metric Template on the last day of the audit. Based on the Guidance For the 2018 RSPO Principles and Criteria Metric Template it is explained that "The Metric Template needs to be filled out by the Certification Unit before carrying out RSPO certification, Recertification, and annual supervisory audits".</p> <p>Thus, the certification unit has the opportunity to re-assure the delivery time of the metric template to the Certification Body.</p>
3	5.1.7	<p>Weighing equipment is verified by an independent third party on a regular basis.</p> <p>The results of document verification revealed that the last re-calibration/scale calibration activity was carried out in 2019 with a validity period of up to 19 September 2020. Until now, the activities up to the remote audit of ASA 1.1 + ASA 1.2 were carried out, the Company has not been able to show the latest recalibration results. In this case the company shows the following evidences:</p> <ul style="list-style-type: none"> • Application letter from PT Dharma Satya Nusantara to the Department of Industry and Trade of the East Kutai Regency Government with Number 0031/DSN-LGL-JKT/II/2022 dated January 10, 2022 regarding the follow-up request and the estimated schedule for measuring electronic weighbridges for palm oil processing mill activities PT Dharma Satya Nusantara Tbk in East Kutai Regency, East Kalimantan province. • Letter from the Industry and Trade Office of East Kutai Regency Number B-510.3/427/Disperindag-PKTN/II/2022 dated January 25, 2022 regarding notification of the implementation of calibration/re-calibration to PT Dharma Satya Nusantara explaining that the calibration/re-calibration service at Until now, East Kutai Regency has not been able to be served due to the lack of availability of the required standard equipment. Besides that, East Kutai Regency UML has collaborated with BSML Regional III in Banjarmasin in this case facilitation where BSML Regional III provides calibration services throughout Kalimantan, so they have to wait for service queues. If the re-calibration can be carried out, it will be informed to the company.

No	Ref. Std.	Description
		The results of the previous assessment (Remote Audit ASA 1.1.) the recalculation activity has become OFI and until the onsite audit activity (ASA 1.1 + 1.2) the recalculation activity is still not able to be carried out. The company has the opportunity to continue to ensure that recalibration activities run positively
4	6.7.1	<p>The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>Based on document review show that POM 4 has a General OHS Officer as OHS Committee secretary but the active period of the Appointment Certificate has expired in August 2021. The results of interviews with the related PIC, obtained information that an application has been made regarding the extension of the SKP (Appointment Certificate) General OHS Authority of PT DSN POM 4 as evidenced by show PT Derap Pembangunan Jaya PJK3 (OHS Service Company) Certificate number 178/EXT-DJP/V/2022 regarding the process of extending the OHS license.</p> <p>Companies are encouraged to ensure that the process of extending the SKP license for the General OHS Officer authority that they own is running positively.</p>
5	6.7.2	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>Based on field observations and interviews at POM 4, Estate JB 1 and Estate LJ 1 show that not all first aider understand the types and functions of the existing first aid kits. The company has the opportunity to improve the understanding of first aid carriers so that they can carry out their duties properly.</p>

3.4.5. Noteworthy Positive Components

No	Description
1	Commitment to implement the principles of sustainable oil palm plantation management.
2	The company showed well-present documents and competent human resources in each respective fields.
3	Contribute in developing local economic by developing associate smallholders.
4	Utilizing organic waste from households for composting
5	UoC's commitment and contribution to local communities development
6	Has Methane Capture and Bio Compressed Natural Gas (BIO-CNG) to produce electricity and gas fuel.
7	Obtained Blue Propernas for the period of 2020-2021
8	The process of fertilizing and transporting FFB mechanized
9	Do not using pesticides with Paraquat as the active ingredients

3.5 Summary of Arising Issues from Public and Auditor Verification



Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Villages around the Company Interviewees:</p> <ol style="list-style-type: none"> Muara Wahau Village (Elder or Community Figure) Dabek Village (Village Head) <ul style="list-style-type: none"> The company absorbs workers from the village. There are no land tenure problems and conflicts between the company and the surrounding community. There are no issues regarding environmental pollution for the past 2 year. The company has socialized about protected animals and conservation areas and put-up signs prohibiting hunting of certain animals around the plantation area. Socialization on the prohibition of burning has been carried out for land clearing activities. The company routinely provides assistance to villages in the form of CSR or direct assistance. Communication between the village and the company is not a problem and the company always responds to requests from the village. 	<p>There are no negative issues from the village community around the company.</p>
<p>East Kutai Regency Environmental Service</p> <ul style="list-style-type: none"> The company already has environmental documents that are in accordance with the provisions. For PKS 4 Environmental Documents are UKL-UPL documents, while for PT Swakarsa Siner Sentosa the environmental documents are in the form of Amdal. Reports on the implementation of environmental management and monitoring plans have been routinely reported by the company. The report is reported every semester. The contents of the environmental management and monitoring report carried out by the company are in accordance with KepmenLH No. 45. The company already has a permit for temporary storage of hazardous and toxic waste that is in accordance with the provisions and the permit is still valid. Reports on the management of hazardous waste on a regular basis have been reported by the company on a quarterly basis. The company already has an LA permit that is in accordance with the provisions and is still valid. POME monitoring reports have been regularly reported by the company. So far, no environmental pollution issues have been carried out by the company. So far, there has been no issue of land fires in the company area. Currently, the Provincial Government of East Kalimantan has a Regional Regulation related to High Conservation Values. However, this Regional Regulation has no derivative regulations. 	<p>There are no negative issues from the East Kutai Regency Environmental Service.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>In this regional regulation, all companies in East Kalimantan are recommended to carry out an inventory of HCVs in the company's area and report to the East Kalimantan Provincial Government. PT Swakarsa Sinersentosa routinely reports annually on the presence of HCVs and the management of HCVs carried out.</p>	
<p>Manpower Agency of Kutai Timur District</p> <ul style="list-style-type: none"> • Mandatory reports related to employment have been submitted regularly in accordance with its period. • The company has registered the Labor Union. • No complaints regarding labor issues (child labor, worker discrimination, forced labor and so on). • There were no information request or complaint from Manpower Agency of Kutai Timur Regency. Every communication with the company is carried out through mobile applications. • There were no complaints related to salary shortages. 	<p>There was no negative issue that need further verification.</p>
<p>Min Sun Lekut Plasma Cooperative</p> <ul style="list-style-type: none"> • Cooperation between cooperatives and companies from 2005. • There is a cooperation agreement between the company and the Cooperative • The management of the cooperative estate is carried out by the company. • The legality of the land for cooperative members is already SHM • The FFB price given by the company is the price set by the East Kalimantan Provincial Plantation Service. The FFB price will be informed by the Company via WhatsApp message. • There were no complaints from the Cooperative regarding the FFB price. • The company has conducted socialization related to the RSPO to the Cooperatives. Currently the Cooperative is in the process of preparing for RSPO certification. • The Cooperative has the authority to make decisions if there are problems. There is no intervention from the company in making decisions or determining the chairman of the cooperative. • FFB payments are made every month and so far there have been no complaints related to FFB payments. 	<p>There are no negative issues from Min Sun Lekut Cooperative.</p>
<p>Min Blea Glang Mandiri Plasma Cooperative</p> <ul style="list-style-type: none"> • Cooperation between cooperatives and companies from 2008. • There is a cooperation agreement between the company and the Cooperative • The management of the cooperative estate is carried out by the company. • The legality of the land for cooperative members is already SHM 	<p>There are no negative issues from Min Blea Glang Mandiri Cooperative.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> The FFB price given by the company is the price set by the East Kalimantan Provincial Plantation Service. The FFB price will be informed by the Company via WhatsApp message. There were no complaints from the Cooperative regarding the FFB price. The company has conducted socialization related to the RSPO to the Cooperatives. Currently the Cooperative is in the process of preparing for RSPO certification. The Cooperative has the authority to make decisions if there are problems. There is no intervention from the company in making decisions or determining the chairman of the cooperative. FFB payments are made every month and so far there have been no complaints related to FFB payments. 	
PT Roni Putra Abadi <ul style="list-style-type: none"> Cooperation between cooperatives and companies has been running for 10 years. There is a cooperation agreement between the company and PT Roni Putra Abadi The FFB price given to PT Roni Putra Abadi as an external supplier is the FFB price set by the East Kalimantan Provincial Plantation Service. The origin of FFB from PT Roni Putra Abadi is FFB originating from the plantation of the owner of PT Roni Putra Abadi and the legality of the land is in the form of SHM. The company has also taken the coordinates of the land from PT Roni Putra Abadi. So far, the collaboration has been going well and there have been no complaints related to FFB payments. 	<p>There are no negative issues from PT Roni Putra Abadi.</p>
Sumber Rezeki Cooperative <ul style="list-style-type: none"> Cooperation between cooperatives and companies from 2006. There is a cooperation agreement between the company and the Cooperative Cooperative estate management is carried out by each land owner The legality of the land for cooperative members is already SHM The FFB price given by the company is the price set by the East Kalimantan Provincial Plantation Service. The FFB price will be informed by the Company via whatsapp message. There were no complaints from the Cooperative regarding the FFB price. The company has conducted socialization related to the RSPO to the Cooperatives. Currently the Cooperative is in the process of preparing for RSPO certification. Cooperative members also have Cultivation Registration Certificate (STDB) and Environmental Management Statement (SPPL). 	<p>There are no negative issues from Sumber Rezeki Cooperative</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> The Cooperative has the authority to make decisions if there are problems. There is no intervention from the company in making decisions or determining the chairman of the cooperative. FFB payments are made every month and so far, there have been no complaints related to FFB payments. 	
Gender Committee Interviewee: <ul style="list-style-type: none"> Gender Committee Secretary of PT. DSN POM 4 Gender Committee Head of PT. Swakarsa Sinarsentosa There were no complaints regarding issues related to sexual harassment and violence against women. All woman in pesticides applicator worker and others work which related to chemical material if reported pregnant, the worker would be transferred to non agrochemical job (e.g.: daycare officer). The gender committee had socialized some policies related to sexual harassment, and child protection. The company has had a policy to protect female workers from sexual harassment in the workplace as well as a grievance mechanism. The company also implemented some regulations related to reproductive rights such as menstruation leave and maternity paid leave. 	<p>There were no negative issues related to gender discrimination that need any further verification. The explanation regarding the interview output had been explained specifically in summary report.</p>
Labor union Interviewee: <ul style="list-style-type: none"> Labor union's head of SPDSN POM 4 (DSN Workers Association) Labor union's head of SPSWA (DSN Workers Association) Bipartite meetings of labor union were held whenever it's needed and if there were any cases or grievances. There were no contract / temporary workers in all estates of PT. SWA, all workers were permanent. The wages applied by the company were in accordance with the applicable minimum wage. The company supports union activities by providing secretarial building and supporting worker union to build a kindergarten. There were no labor-related issues happened in all units. There were no fatal working accidents in 2021-2022. The company had provided accessible restaurants in POM 	<p>There were no negative issues related to worker union that need any further verification. The explanation regarding the interview output had been explained specifically in summary report.</p>
Plantation Agency, Kutai Timur District Interviewee: Business Development Staff – Plantation Business Assessor <ul style="list-style-type: none"> The company has sent plantation business reports in an orderly manner. All palm trees planted are certified seeds. There have been no issues of plantation business disruption and fires in the company area for the last 2 years. 	<p>There are no negative issues from the Plantation Service.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> The company is quite communicative with the Department. 	
Land Office, Kutai Timur District Interviewee: Head of Arrangement and Empowerment <ul style="list-style-type: none"> There are no reports of land disputes for the last 2 years There is no overlap with forest areas and other permits Orderly in HGU reporting The company is quite communicative with the Department. 	<p>There are no negative issues from the Land Office</p>
Local contractor from Benhes Village Interviewee: LJ 1 Estate FFB Transport Contractor and Hillux Car Rental for Assistant Head of LJ 2 Estate <ul style="list-style-type: none"> The FFB transportation cooperation has been carried out for 12 years, while the rental for the Assistant Head has been for 8 years. Cooperation with the company begins with an offer from the company, and a Work Agreement is made which is renewed every 6 months. As long as we work together, the payment is smooth, and if there are complaints, the company responds quickly. Contractor workers have been registered as participants in the BPJS for employment and health, earn higher wages than the UMK, and obtain appropriate PPE. 	<p>There are no negative issues from the LJ 1 Estate FFB Transport Contractor and Hillux Car Rental for Assistant Head of LJ 2 Estate.</p>
Local contractor from Benhes Village Interviewee: POM 4 Local Contractors transporting CPO <ul style="list-style-type: none"> CPO transportation cooperation has been carried out since 2015. Cooperation with the company begins with a company offer, and a Work Agreement is made which is renewed every 6 months. As long as we work together, the payment is smooth, and if there are complaints, the company responds quickly. Contractor workers have been registered as participants in the BPJS for employment and health, earn higher wages than the UMK, and obtain appropriate PPE. 	<p>There are no negative issues from the POM 4 CPO Transport Contractor.</p>
Local contractor from Benhes Village Interviewee: LJ 2 Estate Transport EFB <ul style="list-style-type: none"> EFB transportation cooperation has been carried out since 2011. Cooperation with the company begins with submitting an application, and a Work Agreement is made which is renewed every 6 months. As long as we work together, the payment is smooth, and if there are complaints, the company responds quickly. Contractor workers have been registered as participants in the BPJS for employment and health, earn higher wages than the UMK, and obtain appropriate PPE. 	<p>There are no negative issues from the LJ 1 Estate FFB Transport Contractor and Hillux Car Rental for Assistant Head of LJ 2 Estate.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p style="text-align: center;">Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end; margin-top: 100px;"> <div style="text-align: center;"> <p>POM 4, PT Dharma Satya Nusantara Management Representative</p>  <p><u>Agustinus Triwibowo</u> Friday, 19 August 2022</p> </div> <div style="text-align: center;"> <p>MUTU International Lead Auditor</p>  <p><u>Hasiholan Sihombing</u> Friday, 19 August 2022</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Environmental Agency	Kutai Timur District	-	Via phone	17 May 2022	✓	
2	Manpower Agency	Kutai Timur District	-	Via phone	19 May 2022	✓	
3	Plantation Agency	Kutai Timur District	-	Via Phone	18 May 2022	✓	
4	Land Office	Kutai Timur District	-	Via Phone	19 May 2022	✓	
5	Muara Wahau Village	Kutai Timur District	-	Via phone	17 May 2022	✓	
6	Dabek Village	Kutai Timur District	-	Via phone	18 May 2022	✓	
7	Min Sun Lekut Plasma Cooperative	Kutai Timur District	-	Via phone	18 May 2022	✓	
8	Min Blea Glang Mandiri Plasma Cooperative	Kutai Timur District	-	Via phone	19 May 2022	✓	
9	PT Roni Putra Abadi	Kutai Timur District	-	Via phone	19 May 2022	✓	
10	Sumber Rezeki Cooperative	Kutai Timur District	-	Via phone	20 May 2022	✓	
11	Labor Union in Mill	Kutai Timur District	-	Direct interview	18 May 2022	✓	
12	Labor Union in Estate	Kutai Timur District	-	Via Phone	18 May 2022	✓	
13	Gender Committee in Mill	Kutai Timur District	-	Direct interview	18 May 2022	✓	
14	Gender Committee in Estate	Kutai Timur District	-	Via Phone	18 May 2022	✓	
15	LJ 1 Estate FFB Transport Contractor and Hillux Car Rental for Assistant Head of LJ 2 Estate	Benhes Village	-	Via Phone	19 May 2022	✓	
16	POM 4 CPO Transporter Local Contractor	Benhes Village	-	Via Phone	21 May 2022	✓	
17	LJ 2 Estate Transport EFB	Benhes Village	-	Via Phone	21 May 2022	✓	
18	Worldwide Fund	Jakarta	wwf-indonesia@wwf.or.id	Via email	10 May 2022		✓
19	Wahana Lingkungan Hidup Indonesia	Jakarta	informasi@walhi.or.id	Via email	10 May 2022		✓
20	Sawit Watch	Jakarta	info@sawitwatch.or.id	Via email	10 May 2022		✓
21	Worldwide Fund	Jakarta	wwf-indonesia@wwf.or.id	Via email	10 May 2022		✓
22	POM 4 <ul style="list-style-type: none">• 3 security officers• 3 grading officers• 1 mechanical worker• 1 sterilizer operator• 1 tipler operator• 1 engine room operator• 1 boiler operator• 1 kernel operator• 1 worker WWTP• 1 Worker EBA• 2 Worker in Housing Complex	Kutai Timur District	-	Direct interview	18 May 2022	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
23	Jabdan 1 Estate <ul style="list-style-type: none"> • 3 harvesting workers • 1 harvesting foreman • 1 tractor operator • 1 pesticide application foreman • 10 pesticide application workers • 1 harvesting clerk • 2 manual loading workers • 2 pest and plant disease census worker • 1 fire monitoring tower officer • 1 Worker PPE warehouse • 2 Worker in Agrochemicals warehouse • 1 worker in fertilizer warehouse • 1 team firefighting • 1 worker in Hazardous waste storage • 1 Worker Daycare • 2 Worker in Clinic • 1 Worker in Housing Complex 	Kutai Timur District	-	Direct interview	19 May 2022	✓	
24	Long Jenew 1 Estate <ul style="list-style-type: none"> • 1 harvesting foreman • 1 manual circle weeding foreman • 2 manual circle weeding workers • 1 manual path weeding foreman • 2 manual path weeding workers • 1 Worker PPE warehouse • 2 Worker in Agrochemicals warehouse • 1 worker in fertilizer warehouse • 1 team firefighting 	Kutai Timur District	-	Direct interview	20 May 2022	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
	<ul style="list-style-type: none"> 1 worker in Hazardous waste storage 1 Worker Daycare 1 Worker in Housing Complex 						
25	Long Jenew 2 Estate <ul style="list-style-type: none"> 1 harvesting foreman 2 harvesting workers 1 FFB loading workers 5 pesticide application workers 1 pesticide application foreman 1 Worker PPE warehouse 1 Worker in Agrochemicals warehouse 1 worker in fertilizer warehouse 1 team firefighting 1 worker in Hazardous waste storage 1 Worker Daycare 1 Worker in Housing Complex 	Kutai Timur District	-	Direct interview	21 May 2022	✓	

Appendix 2. Assessment Program

DATE	17 – 24 May 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Tuesday, 17 May 2022		
05.00 – 09.00	JAKARTA → SAMARINDA	All Auditor
09.00 – 18.00	From the airport in Samarinda to the audit location in Kutai Timur District	All Auditor
Wednesday, 18 May 2022		
08.00 – 09.00	OPENING MEETING <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	Management of Unit Certification All Auditor
09.00 – 12.00	<ul style="list-style-type: none"> Stakeholders consultation by phone to related agencies Stakeholder consultation to affected communities surrounding the plantations, indigenous peoples, local communities and previous land owners by phone Interview by phone with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Smallholders, Third Party Supplier (if any), local NGO (if any) Document Verification 	II Auditor
12.00 – 14.00	Break	
14.00 – 17.00	Field observation to POM 4 <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge) Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect, security post, FFB Sorting, Processing Activity, Despatch CPO) Implementation of Environmental aspect, Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond & land application 	HHS SAS & MIA RAB
16.30 – 17.00	Submission of audit progress	
Thursday, 19 May 2022		
08.00 – 12.00	Field Observation to Jabdan 1 Estate Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	HHS SAS & MIA RAB

DATE	17 – 24 May 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
12.00 – 14.00	Break	
14.00 – 17.00	<ul style="list-style-type: none"> Continuing stakeholder consultation (if anything was not done the previous day) Continuing Document Verification 	All Auditor
16.30 – 17.00	Submission of audit progress	All Auditor
Friday, 20 May 2022		
08.00 – 12.00	Field Observation to Long Jenew 1 Estate Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	HHS SAS & MIA RAB
12.00 – 14.00	Break	
14.00 – 17.00	<ul style="list-style-type: none"> Continuing stakeholder consultation (if anything was not done the previous day) Continuing Document Verification 	All Auditor
16.30 – 17.00	submission of audit progress	All Auditor
Saturday, 21 May 2022		
08.00 – 12.00	Field Observation to Long Jenew 2 Estate Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	HHS SAS & MIA RAB
12.00 – 14.00	Break	
14.00 – 15.00	Penyampaian progres audit // submission of audit progress	All Auditor
15.00 – ...	Auditor akan melanjutkan Verifikasi Dokumen di Mess // Auditor will continuing Document Verification in Mess	All Auditor
SUNDAY, 22 May 2022 (DAY OFF)		
Monday, 23 May 2022		

DATE	17 – 24 May 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 10.00	Continuing Document Verification	All Auditor
12.00 – 14.00	Break	All Auditor
10.00 – 12.00	Internal Meeting (closing meeting preparation)	
16.00 – 17.00	CLOSING MEETING <ul style="list-style-type: none"> Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion) Comments, Responses and Questions 	All Auditor and Management of Unit Certification All Auditor
Tuesday, 24 May 2022		
04.00 – 08.00	Travel from mess to the airport in Berau	All Auditor
10.00 –	BERAU → JAKARTA	All Auditor