

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

[✓] Surveillance

Name of Management Organisation : Muara Kandis POM – PT Djuandasawit Lestari Subsidiary of Golden Agri Resources Ltd

Plantation Name : Muara Kandis Estate and Muara Tawas Estate

Location : Village of Lubuk Pandan, Sub District of Muara Lakitan, District of Musi Rawas, Province of Sumatera Selatan, Indonesia.

Certificate Code : **MUTU-RSPO/059**

Date Initial registration : 18 May 2015

Date of Certificate issue : 16 July 2021 Date of License Issue : 16 October 2022

Date of Certificate Expiry : 15 July 2026 Date of License Expiry : 15 July 2023

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.1	20 to 24 June 2022	Hasiholan Sihombing, Rahmat Abdiansyah, Sentot Adi Subandono, Helma Namira	Ardiansyah	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.1	20 July 2022

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 MUTU Certification • Accredited by Accreditation Services International
 on March 12th, 2014 with registration number **ASI-ACC-055**

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Figure 1. Location Map of PT Djuandasawit Lestari (Muara Kandis Estate)

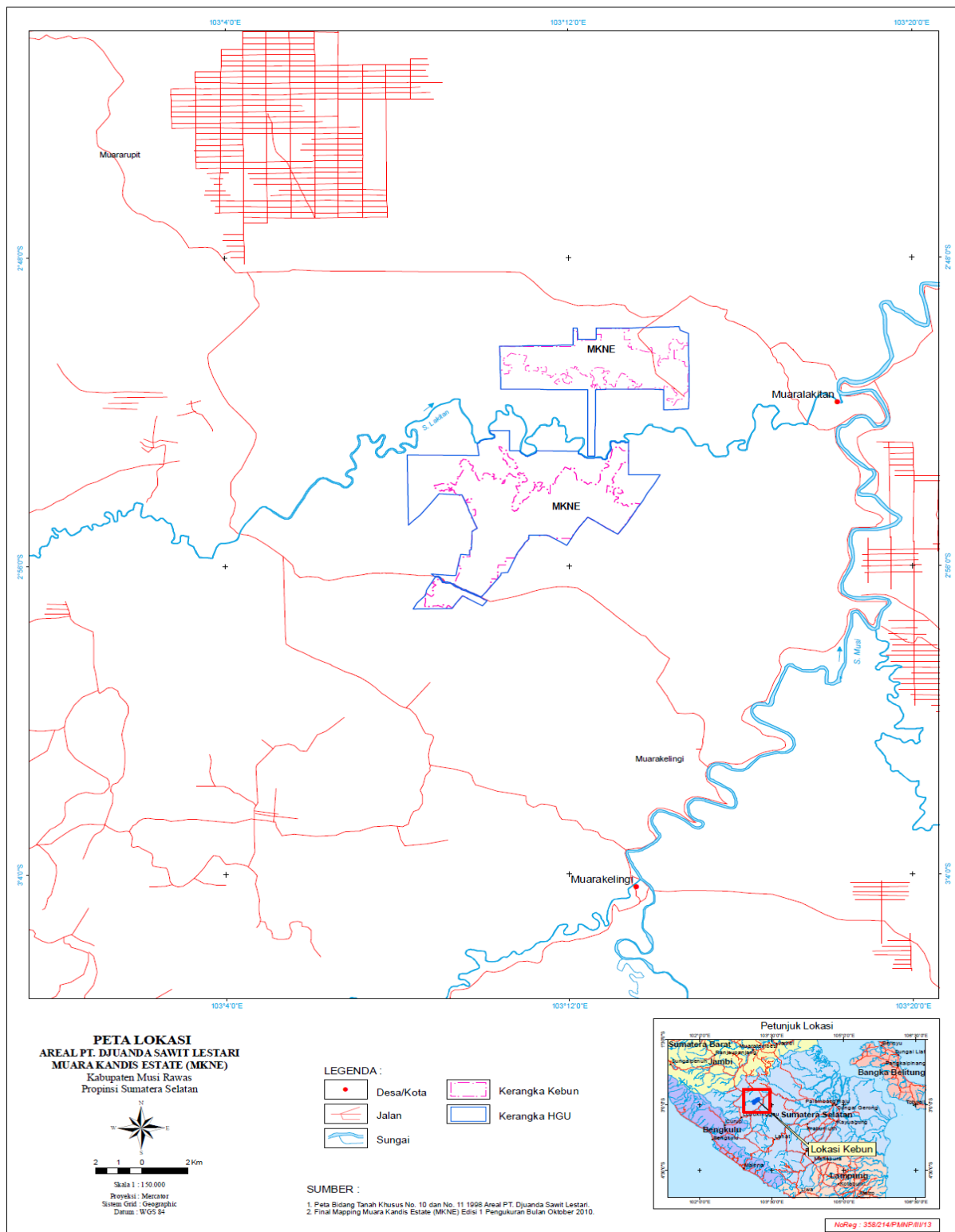


Figure 2. Location Map of PT Djuandasawit Lestari (Muara Tawas Estate)

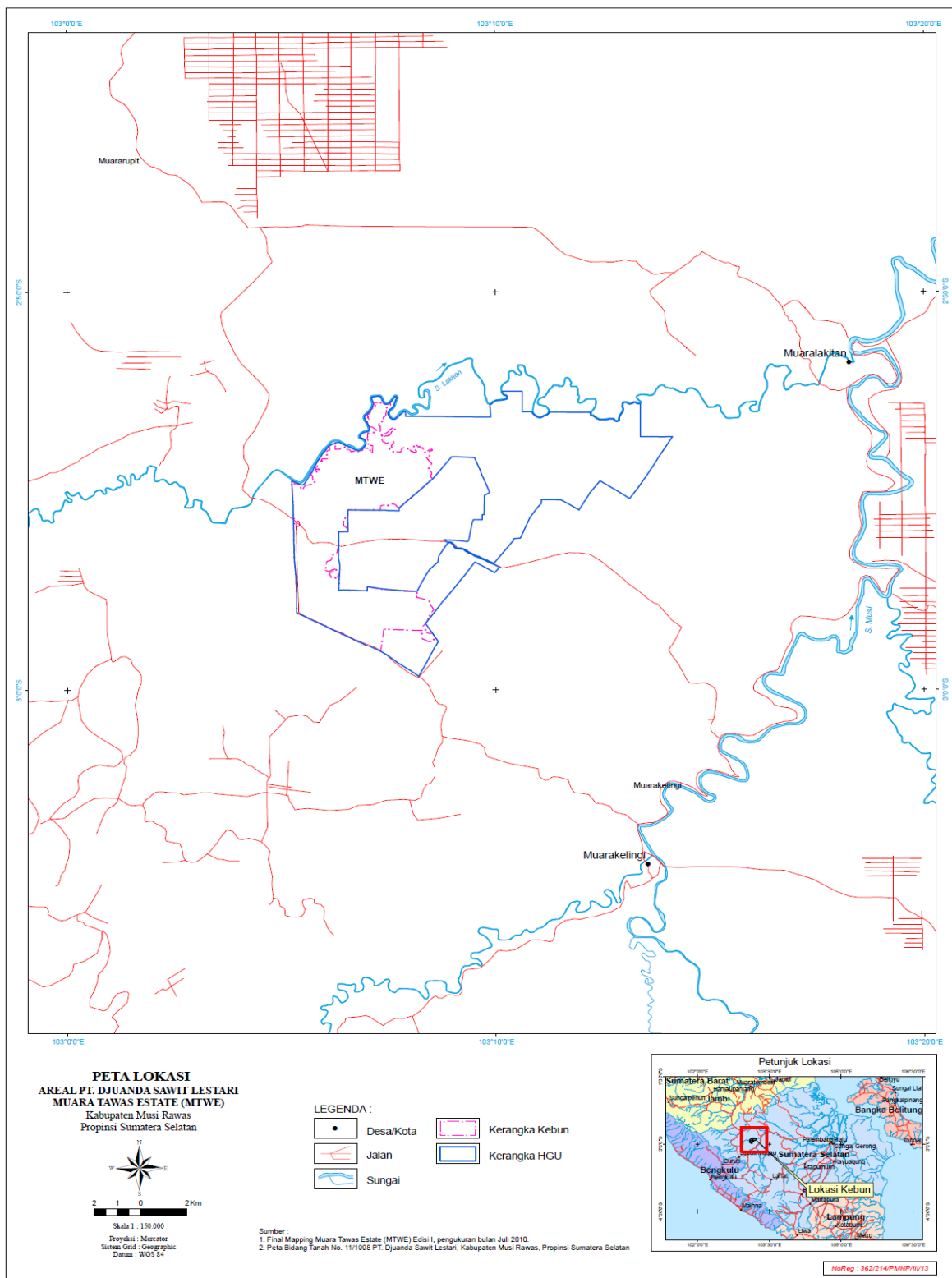


Figure 3. Operational Map of PT Djuandasawit Lestari (Muara Kandis Estate)

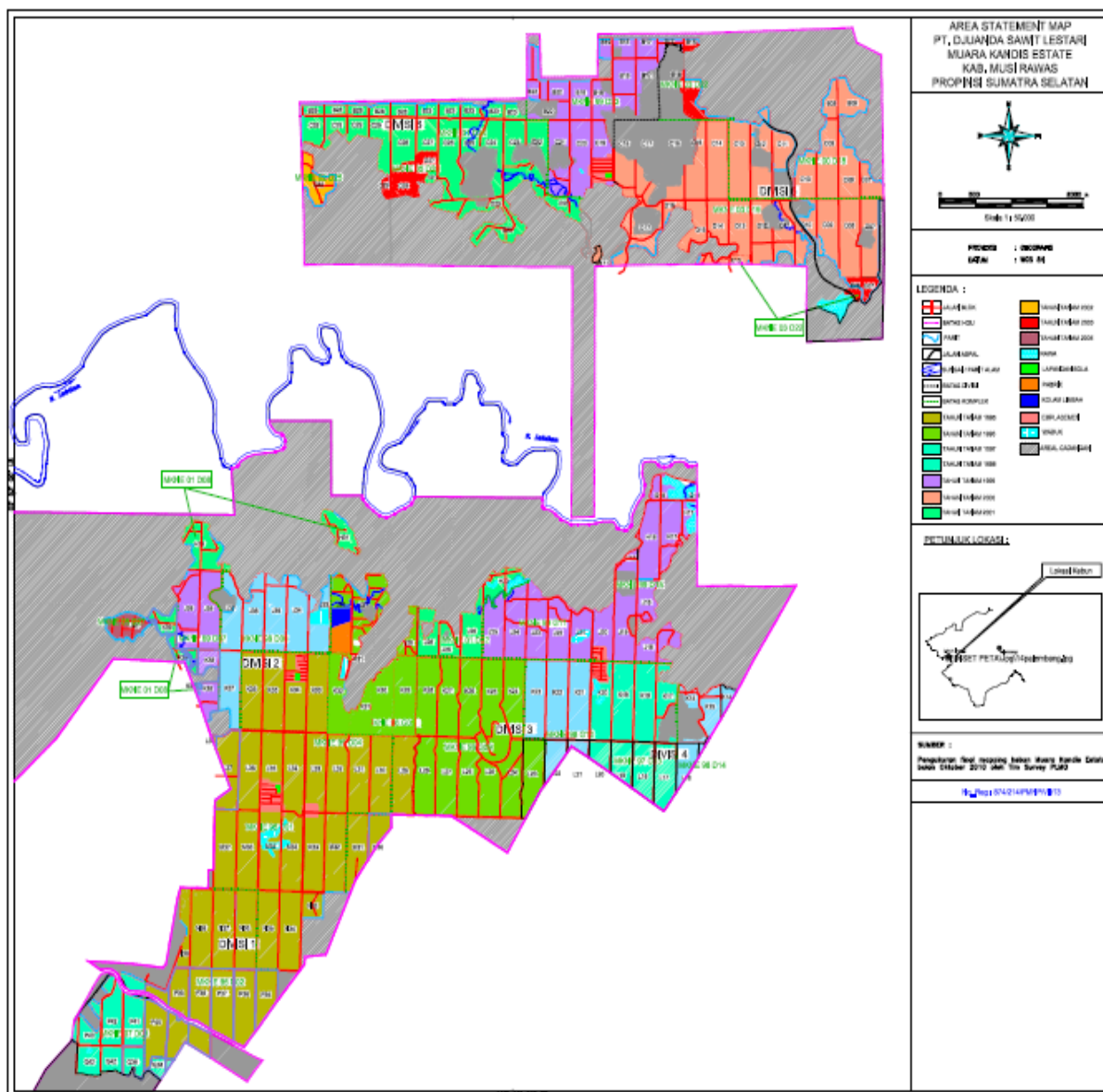
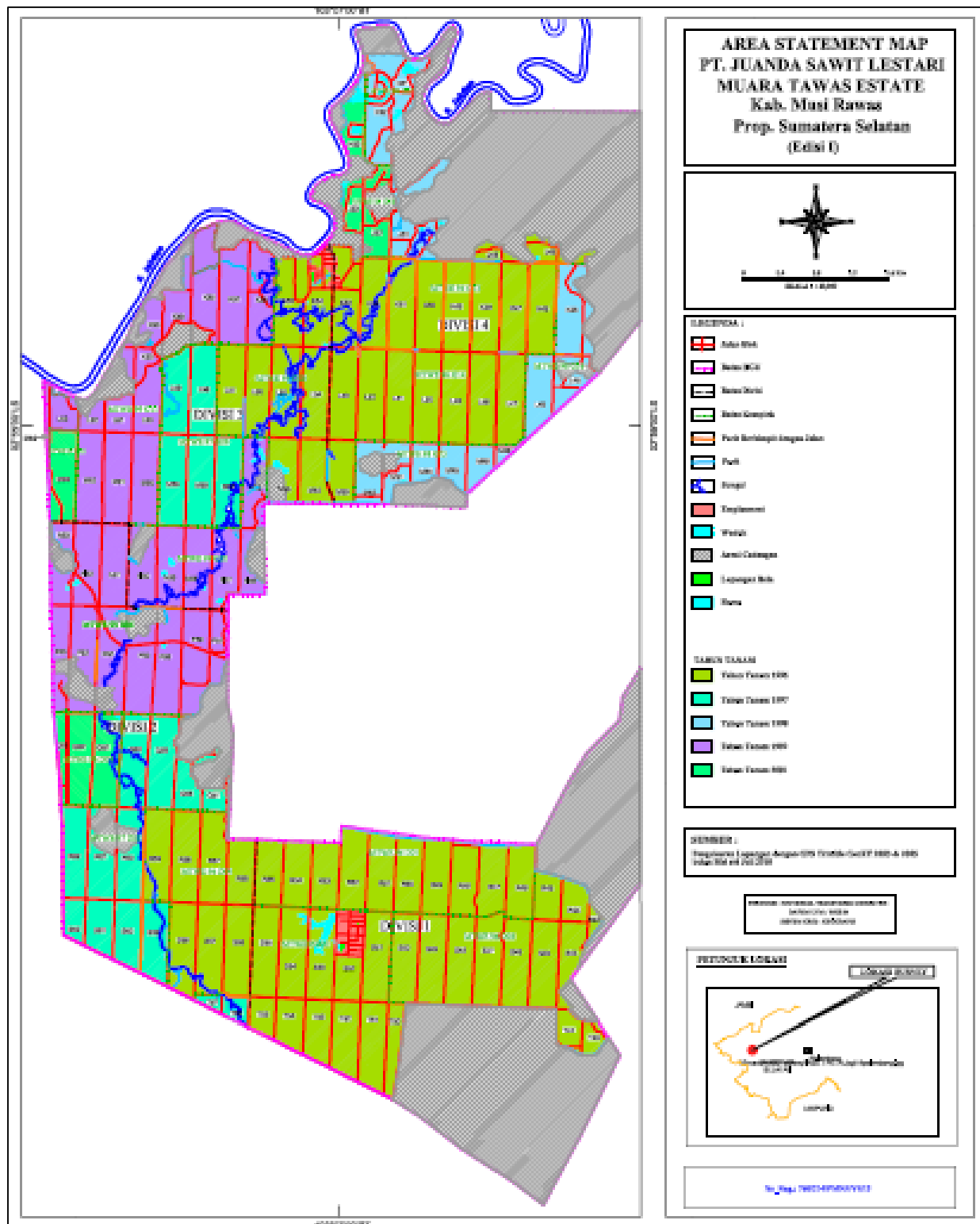


Figure 4. Operational Map of PT Djuandasawit Lestari (Muara Tawas Estate)



Abbreviations Used

AMDAL	:	<i>Analisis Dampak Lingkungan</i> – Environmental Impact Assessment (EIA)
ANDAL	:	<i>Analisis Dampak Lingkungan</i> – Environmental Impact Assessment (EIA)
ASA	:	Annual Surveillance Assessment
BAPPEDA	:	<i>Badan Perencanaan Pembangunan Daerah</i> / Regional Planning & Development Agency
BKSDA	:	<i>Badan Konservasi Sumberdaya Alam</i>
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i>
CFO	:	Chief Financial Officer
CH	:	Certificate Holder
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CLA	:	Collective Labor Agreement
CSR	:	Corporate Social Responsibility
CPO	:	Crude Palm Oil
DELH	:	<i>Dokumen Evaluasi Lingkungan Hidup</i> (Environmental Evaluation Document)
DLH	:	<i>Dinas Lingkungan Hidup</i> / Environmental Agency
DSL	:	Djuandasawit Lestari
EFB	:	Empty Fruit Bunch
EIA	:	Environmental Impact Assessment
EHS	:	Environmental, Health and Safety
FPIC	:	Free, Prior, Informed, Consent
FR	:	Frequency Rate
FFB	:	Fresh Fruit Bunches
GSEP	:	GAR Social and Environmental Policy
GPS	:	Global Positioning System
HAM	:	<i>Hak Asasi Manusia</i>
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title)
HSE	:	Health Safety and Environment
HCS	:	High Carbon Stock
HCV	:	High Conservation Value
HRD	:	Human Resources Development/Department
IPM	:	Integrated Pest Management
ILO	:	International Labour Organization
KER	:	Kernel Extraction Rate
KKPA	:	<i>Kredit Koperasi Petani Anggota</i> (Full Managed Smallholders)
KLHK	:	<i>Kementerian Lingkungan Hidup dan Kehutanan</i> / Ministry of Environment and Forestry
KSLG	:	<i>Kebijakan Sosial Lingkungan Golden Agri Resources</i>
KSU	:	<i>Koperasi Serba Usaha</i> / Smallholder Cooperative
LB3	:	<i>Limbah Bahan Berbahaya Beracun</i> (Hazardous Waste)
LSU	:	Leaf Sampling Unit
MSDS	:	Material Safety Data Sheet
MKNE	:	Muara Kandis Estate
MKNM	:	Muara Kandis Mill
MTWE	:	Muara Tawas Estate
NPWP	:	<i>Nomor Pokok Wajib Pajak</i>
NGO's	:	Non-Government Organization's
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety

OIA	:	Operational Internal Audit
PK	:	Palm Kernel
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> (OHS Committee)
POME	:	Palm Oil Mill Effluent
PCDV	:	Policy and Compliance Division
PPE	:	Personal Protective Equipment
PIC	:	Personel In Charge
PMNP	:	Plantation Monitoring and Planning
PT DSL	:	PT Djuandasawit Lestari
RaCP	:	Remediation and Compensation Procedures
RSPO	:	Roundtable on Sustainable Palm Oil
RKL- RPL	:	Environmental Management and Monitoring Report
RTE	:	Rare, Threatened, Endangered
SCCS	:	Supply Chain Certification Standard
SHM	:	<i>Surat Hak Milik</i> /Freehold Title
SIA	:	Social Impact Assessment
SIMPEL	:	<i>Sistem Pelaporan Elektronik</i> (Electronic Reporting System)
SIPPAIR	:	<i>Surat Izin Pengambilan dan Pemanfaatan Air Permukaan</i> (Surface Water Utilization and Utilization Permit)
SKT	:	<i>Surat Keterangan Tanah</i> /Certificate of Landregister
SMARTRI	:	Sinar Mas Agro Resources and Technology Research Institute
SMD	:	Senior Managing Director
SOP	:	Standard Operational Procedure
SPO	:	Sustainability Palm Oil
SPPH	:	<i>Surat Pernyataan Pelepasan Hak (atas tanah)</i> /Agreement of conveyance and waiver of (land) rights.
SR	:	Severity Rate
SSU	:	Soil Sampling Unit
TTE	:	<i>Tanda Terima Elektronik</i> (Electronic Receipt)
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	Organisation name listed in the certificate	PT Djuandasawit Lestari subsidiary of Golden Agri Resources Ltd.	
1.2.2	Contact person	Yahya Mustakim	
1.2.3	Organisation address and site address	RSPO registered company: 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535. Liaison Office: Sinar Mas Land Plaza, Tower II, 30th Floor. Jl. MH Thamrin No. 51, Jakarta 10350, Indonesia.	
1.2.4	Telephone	(+62-21) 50338899	
1.2.5	Fax	(+62-21) 50389999	
1.2.6	E-mail	yahya.mustakim@sinarmas-agri.com	
1.2.7	Web page address	www.goldenagri.com.sg	
1.2.8	Management Representative who completed the application for certification	Yahya Mustakim (Head of Sustainability Management System and Certification Operations Sustainability)	
1.2.9	Registered as RSPO member	1-0096-11-000-00 – 30 January 2005	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: Muara Kandis POM, Muara Kandis Estate and Muara Tawas Estate.	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Muara Kandis Mill	Lubuk Pandan Village, of Muara Lakitan Sub District, Musi Rawas District, Sumatera Selatan Province, Indonesia	S 2° 54' 00" E 103° 10' 38"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Muara Kandis Estate	Lubuk Pandan Village, Muara Lakitan Sub-District, Karya Sakti Village, Muara Kelingi Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	S 2° 55' 09" E 103° 10' 15"

	Muara Tawas Estate	Karya Mukti Village and Lubuk Tua Village, Muara Kelingi Sub-District, Muara Magang Village, Megang Sakti Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	S 2° 58' 02"	E 103° 07' 07"			
1.5	Description of Area Statement						
1.5.1	Tenure						
	• State		10,958.40	Ha			
	• Community		-	Ha			
1.5.2	Area Statement						
	• Total area		10,958.40	Ha			
	• Mature area		6,259.77	Ha			
	• Immature area		-	Ha			
	• Housing, Mill and roads		317.34	Ha			
	• Unplantable area (riparian, reservoir boundary)		107.99	Ha			
	• Enclave of community / land bank (has not been compensated)		3,880.76	Ha			
	• Other area (slope, quarry)		392.54	Ha			
	• HCV		385.20*	Ha			
	Note: HCV area is the riparian area and included to planted area.						
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)					
		Muara Kandis Estate	Muara Tawas Estate	Total			
	1995	861.43	-	861.43			
	1996	520.92	1,620.80	2,141.72			
	1997	269.75	386.06	655.81			
	1998	364.90	102.79	467.69			
	1999	423.18	704.17	1,127.35			
	2000	443.50	-	443.50			
	2001	338.96	134.76	473.72			
	2002	15.99	-	15.99			
	2003	33.01	-	33.01			
	2005	39.55	-	39.55			
	TOTAL	3,311.19	2,948.58	6,259.77			
	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 (tones/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tones)	Extraction (%)	Out put (tones)	Extraction (%)
	Muara Kandis	60	262,050.36	54,479.48	20.79	15,514.58	5.92

	*Production data source period from June 2021 to May 2022						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/ year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Muara Kandis Estate	6,635.56	3,311.19	43,021.65	12.99	43,021.65	100
	Muara Tawas Estate	4,322.84	2,948.58	53,841.65	18.26	53,841.65	100
	TOTAL	10,958.40	6,259.77	96,863.30	15.47	96,863.30	100
	*Production data source period from June 2021 to May 2022						
1.7.3	FFB description from other source						
	Name of sources/Organisation (RSPO certified / non-certified)	Type of Organization	number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Muara Kandis Estate (RSPO Non-Certified)	PT Djuandasawit Lestari	-	418.49	18,381.77		
	Muara Tawas Estate (RSPO Non-Certified)	PT Djuandasawit Lestari	-	57.70	2,314.72		
	Pandawa Plasma - Sadar Sejahtera Cooperative (RSPO Non-Certified)	Plasma of PT Djuandasawit Lestari	1,420	3,228.18	72,914.93		
	PT Citraloka Bumi Begawan (RSPO Non-Certified)	Independent Supplier	-	-	3,116.88		
	PT Evans Lestari (RSPO Non-Certified)	Independent Supplier	-	-	326.53		
	PT Putra Tunggal Mulia Sawit (RSPO Non-Certified)	Independent Supplier	-	-	15,448.07		
	PT. Daya Agro Lestari (RSPO Non-Certified)	Independent Supplier	-	-	4,364.91		
	Maulana Malik S (RSPO Non-Certified)	Independent Supplier	-	-	4,103.48		
	Susiyanto (RSPO Non-Certified)	Independent Supplier	-	-	3,934.03		
	Sadar Sejahtera Bersama (RSPO Non-Certified)	Independent Supplier	-	-	19,258.75		
	Boymin (RSPO Non-Certified)	Independent Supplier	-	-	8,978.12		
	PT Anugrah Agung Amanah (RSPO Non-Certified)	Independent Supplier	-	-	12,231.11		
	TOTAL					165,373.30	
*Production data source period from June 2021 to May 2022							
1.7.4	Product categories		FFB, CPO, PK				
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT)		Actual Certified Volume (June 2021 to May 2022) (MT)		
	FFB Processed		150,000		96,493.28		
	CPO Production		33,000		20,451.97		
	Palm Kernel (PK) Production		8,700		5,886.67		

1.8.2	Product selling							
	Type of selling product			Actual selling product for last year (June 2021 to May 2022) (MT)				
	CSPO sold as RSPO certified product			0				
	CSPK sold as RSPO certified product			5,822.45				
	CSPO sold under another scheme			19,666.16				
	CSPK sold under another scheme			0				
	CSPO sold as conventional			0				
	CSPK sold as conventional			0				
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Muara Kandis Estate	6,635.56	3,311.19	46,000	13.89			
	Muara Tawas Estate	4,322.84	2,948.58	58,000	19.67			
	TOTAL	10,958.40	6,259.77	104,000	16.61			
	*Projection of FFB production for 12 months of certificate							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO Out put (tonnes)	Extraction (%)	Palm Kernel Out put (tonnes)	Extraction (%)	Supply Chain Module
	Muara Kandis	60	104,000	22,000	21.15	6,200	5.96	Mass Balance
	*Projection of CSPO and CSPK production for 12 months of certificate							
1.9	Other Certifications							
	ISCC		EU-ISCC-Cert-ID215-23211286, valid thru 26 December 2022					
	ISPO		MUTU-ISPO/054, valid thru 28 June 2026					
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							
Pangkalan Panji Mill (PT Sawit Mas Sejahtera)	2013	Sawit Mas Estate	2013	Sumatera Selatan Province	Certified			
		Sawit Mas Estate (HGU on progress – 2,291 Ha)	2022		-			
Bumi Sawit Mill (PT Bumi Sawit Permai)	2013	Bumi Sawit Estate	2013	Sumatera Selatan Province	Certified			
		Bumi Sawit Estate (HGU on progress – 773.39 Ha)	2022		-			
Muara Kandis Mill (PT Djuandasawit Lestari)	2013	Muara Tawas Estate	2013	Sumatera Selatan Province	Certified			
		Muara Kandis Estate	2013		Certified			
		Muara Kandis Estate (HGU on progress – 418.49 Ha)	2022		-			

		Muara Tawas Estate (HGU on progress – 57.7 Ha)	2022		-
		Smallholder (KKPA Pandawa)	2024		-
Sungai Rungau Mill (PT Sumber Indah Perkasa)	2013	Sungai Rungau Estate	2013	Kalimantan Tengah Province	Certified
		Sungai Seruyan Estate	2013		Certified
		Terawan Estate	2013		Certified
		Tangar Estate	2013		Certified
		Bukit Tiga Estate	2013		Certified
Bukit Perak Mill (PT Bumi Permai Lestari)	2013	Bukit Perak Estate	2013	Bangka Belitung Province	Certified
		Bukit Permata Estate	2013		Certified
		Bukit Permai Estate (PT Agrolestari Subur Sejahtera)	2024		-
		Bukit Lestari estate (PT Agrolestari Hijau Sentosa)	2024		-
Tanjung Kembiri Mill (PT Forestalestari Dwikarya)	2013	Tanjung Kembiri Estate	2013	Bangka Belitung Province	Certified
		Tanjung Rusa Estate	2013		Certified
		Tanjung Rusa Estate (HGU on process 48.81 Ha)	2022		-
		Tanjung Sawit Estate (PT Palmindo Biliton Berjaya)	2024		-
		Tanjung Sawit Plasma (PT Palmindo Biliton Berjaya)	2024		-
		Tanjung Rusa KKPA	2024		-
Sungai Buaya Mill (PT Sumber Indah Perkasa)	2014	Sungai Buaya Estate	2014	Lampung Province	Certified
		Sungai Buaya Estate (HGU on process – 155.46 Ha)	2022		-
		Smallholder (KKPA Gedung Aji Lama)	2014		Certified
		Smallholder (KKPA Mesuji)	2014		Certified
Sungai Merah Mill (PT Sumber Indah Perkasa)	2014	Sungai Merah Estate	2014	Lampung Province	Certified
		Sungai Merah Estate (HGU on process – 241.54 Ha)	2022		-
		Smallholder (KKPA Gedung Aji Baru)	2014		Certified
Kasuari Mill (PT Sinar Kencana Inti Perkasa)	2023	Cendrawasih Estate	2023	Papua Province	ST-1
		Nuri Estate	2023		ST-1

		Rajawali Estate	2023		ST-1
		Mambruk Estate (PT Sumber Indah Perkasa)	2023		ST-1
Pekawai Mill (PT Agrolestari Mandiri)	2022	Kayung Estate	2022	Kalimantan Barat Province	ST-1
		Pekawai Estate	2022		ST-1
		Sungai Kelik Estate	2022		ST-1
		Nanga Tayap Estate	2022		ST-1
		Smallholder (Kayung Plasma)	2023		ST-1
Kenanga Mill (PT Kencana Permai)	2014	Kencana Estate	2015	Kalimantan Barat Province	Certified
		Cendana Estate	2015		Certified
		Kenanga Estate (PT Cahaya Nusa Gemilang)	2023		-
		Delima Estate (PT Kencana Graha Permai)	2023		-
		Smallholder (Kencana Plasma)	2024		-
		Smallholder (Kenanga Plasma)	2024		-
Perdana Mill (PT Binawit Pratama)	2025	Perdana Estate	2025	Kalimantan Tengah Province	ST-1
		Langgana Estate	2025		ST-1
		Semandau Estate	2025		ST-1
		Muara Dua Estate	2025		ST-1
Kuayan Mill (PT Agrokarya Lestari)	2025	Bukit Santuhai Estate	2025	Kalimantan Tengah Province	ST-1
		Tajur Beras Estate	2025		ST-1
		Seranau Estate	2025		ST-1
		Sungai Sambon Plasma	2025		-
		Sapiri Estate (PT Buana Adhitama)	2025		ST-1
		Sapiri Plasma	2025		-
		Bukit Dua Estate (PT Buana Adhitama)	2025		-
Belian Mill (PT Paramitra Internusa Pratama)	2022	Belian Estate	2022	Kalimantan Barat Province	ST-1
		Tengkawang Estate	2022		ST-1
		Muara Tawang Estate (PT Kartika Prima Cipta)	2022		ST-1

		Kapuas Hulu Estate (PT Persada Graha Mandiri)	2022		ST-1
		Sungai Beran Estate (PT Persada Graha Mandiri)	2022		ST-1
		Smallholder (Belian KKPA)	2024		-
		Smallholder (Muara Tawang KKPA)	2024		-
		Smallholders (Kapuas Hulu KKPA)	2024		-
Sungai Kupang Mill (PT Sinar Kencana Inti Perkasa)	2020	Sungai Kupang Estate	2020	Kalimantan Selatan Province	Certified
		Sungai Kupang KKPA	2024		-
		Sungai Panci Estate	2012		Certified
		Sungai Panci KKPA	2012		Certified
Sungai Kikim Mill (PT Sawit Mas Sejahtera)	2023	Sungai Kikim Estate	2023	Sumatera Selatan Province	-
		Sungai Pangi Estate	2023		-
		Sungai Musi Estate	2023		-
		Sungai Saling Estate	2023		-
		Sungai Enim Estate (PT Bumi Sawit Permai)	2023		-
		Sungai Lematang Estate (PT Bumi Sawit Permai)	2023		-
		Sungai Bungur Estate (PT Prima Cipta Mandiri)	2023		-
		Sungai Lingsing Estate (PT Prima Cipta Mandiri)	2023		-
Tangar Mill (PT Mitrakarya Agroindo)	2025	Sulin Estate	2025	Kalimantan Tengah Province	-
		Sulin Plasma	2025		-
		Nahiyang Estate	2025		-
		Katayang Estate	2025		-
Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa)	2023	Sungai Magalau Estate	2023	Kalimantan Selatan Province	-
		Senakin Estate	2023		-
		Sungai Manunggul Estate (PT Mitra Nusa Permata)	2024		-
Jalemo Mill (PT Agro Lestari Sentosa)	2025	Jalemo Estate	2025	Kalimantan Tengah Province	-
		Kajui Estate (PT Agro Lestari Sentosa)	2025		-
		Manuhing Estate (PT Agro Lestari Sentosa)	2025		-
		Manuhing KKPA	2025		-

Sako Mill (PT Adi Tunggal Mahajaya)	2025	Mentaya Estate	2025	Kalimantan Tengah Province	ST-1
		Kuayan Estate	2025		ST-1
		Sako Plasma	2025		-
		Sungai Ayawan Estate	2025		-
		Sungai Nusa Estate	2025		-
Padang Halaban Mill (PT SMART Tbk)	2011	Padang Halaban Estate	2011	Sumatera Utara Province	Certified
		Pernantian Estate	2011		Certified
		Adipati Estate	2011		Certified
		Kanopan Ulu Estate	2011		Certified
Batu Ampar Mill (PT SMART Tbk)	2012	Batu Ampar Estate	2012	Kalimantan Selatan Province	Certified
		Batu Mulia Estate	2012		Certified
Tanah Laut Mill (PT SMART Tbk)	2012	Tanah Laut Estate	2012	Kalimantan Selatan Province	Certified
		Kintapura Estate	2012		Certified
		Kintapura Estate (HGU on process - 636.33 Ha)	2022		-
Langga Payung Mill (PT Tampilan Nadenggan)	2012	Langga Payung Estate	2012	Sumatera Utara Province	Certified
		Paya Baung Estate	2012		Certified
		Normark Estate	2012		Certified
Hanau Mill (PT Tampilan Nadenggan)	2012	Hanau Estate	2012	Kalimantan Tengah Province	Certified
		Tasik Mas Estate	2012		Certified
		Tanjung Paring Estate	2012		Certified
		Langadang Estate	2012		Certified
		Medang Sari Estate (PT Satya Kisma Usaha)	2025		-
Semilar Mill (PT Tampilan Nadenggan)	2013	Semilar Estate	2013	Kalimantan Tengah Province	Certified
		Sei Rindu Estate	2013		Certified
		Mandang Estate (PT Buana Arta Sejahtera)	2013		Certified
		Puri Estate (PT Buana Arta Sejahtera)	2013		Certified
		Sei Rindu Estate (203,89 Ha)	2023		
Jak Luay Mill (PT Tampilan Nadenggan)	2015	Pantun Mas Estate	2015	Kalimantan Timur Province	Certified
		Jak Luay Estate	2015		Certified
		Jak Luay KKPA	2023		-
		Long Buluh Estate	2015		Certified
		Long Buluh Estate (HGU on progress - 329.66 Ha)	2023		-
		Bukit Subur Estate	2015		Certified

		Bukit Subur Estate (HCV identification on process - 569.62 Ha)	2023		-
		Bukit Subur KKPA	2023		-
Leidong West Mill (PT MP Leidong West Indonesia)	2014	Leidong West Utara Estate	2014	Bangka Belitung Province	Certified
		Leidong West Selatan Estate	2014		Certified
		Bukit Intan Estate (PT Bumipermai Lestari)	2014		Certified
		Bukit Mas Estate (PT Bumipermai Lestari)	2014		Certified
Muara Wahau Mill (PT Kresna Duta Agroindo)	2014	Muara Wahau Estate	2014	Kalimantan Timur Province	Certified
		Gunung Kombeng	2014		Certified
Gunung Kombeng Mill (PT Kresna Duta Agroindo)	2024	Gunung Kombeng KKPA	2024	Kalimantan Timur Province	-
Rantau Panjang (PT Kresna Duta Agroindo)	2022	Rantau Panjang Estate	2023	Kalimantan Timur Province	-
		Rantau Panjang KKPA	2023		-
Jelatang Mill (PT Kresna Duta Agroindo)	2014	Bangko Estate	2014	Jambi Province	Certified
Pelakar Mill (PT Kresna Duta Agroindo)	2020	Pelakar Estate	2020	Jambi Province	Certified
		Batang Merangin Estate	2020		Certified
		Tiga Serumpun KKPA	2024		-
Langling Mill (PT Kresna Duta Agroindo)	2014	Bangko Estate	2014	Jambi Province	Certified
		Batang Gading Estate (PT Satya Kisma Usaha)	2023		-
		Batang Gading KKPA (PT Satya Kisma Usaha)	2024		-
Sungai Bengkal Mill (PT Satya Kisma Usaha)	2015	Sungai Bengkal Estate	2015	Jambi Province	Certified
		Sungai Bengkal Estate (RaCP process - 610.88 Ha)	2023		-
		Sungai Bengkal KKPA	2015		Certified
		Sungai Bengkal KKPA (RaCP process - 1,063.92 Ha)	2023		-
		Muara Kilis Estate	2015		Certified
		Muara Kilis Estate (RaCP process - 1,460.54 Ha)	2023		-
		Kilis KKPA	2024		-
Bukit Kapur Mill (PT)	2025	Bukit Kapur Estate	2025	Kalimantan Selatan	ST-1

SMART Tbk)		Sungai Cantung Estate	2025	Province	ST-1
Samsam Mill (PT Ivomas Tunggal)	2009	Samsam Estate	2009	Riau Province	Certified
		Samsam Estate (HGU on progress – 29.09 Ha)	2022		-
		Kandista Estate	2009		Certified
		Kandista Estate (HGU on progress – 158.46 Ha)	2022		-
		Palapa Estate	2009		Certified
Libo Mill (PT Ivomas Tunggal)	2009	Libo Estate	2009	Riau Province	Certified
		Nenggala Estate	2009		Certified
		Nenggala Estate (HGU on progress 419.9 Ha)	2022		-
		Sei Rokan Estate	2009		Certified
		Sei Rokan Estate (HGU on progress – 102.7 Ha)	2022		-
		Sungai Tapung Plasma	2009		Certified
Ujung Tanjung Mill (PT Ivomas Tunggal)	2009	Ujung Tanjung Estate	2009	Riau Province	Certified
		Ujung Tanjung Estate (HGU on progress – 557.3 Ha)	2023		-
		Kandis Sejahtera KKPA	2023		-
Naga Sakti Mill (PT Buana Wiralestari Mas)	2010	Naga Mas Estate	2010	Riau Province	Certified
		Naga Mas Estate (HGU on process – 253.39 Ha)	2022		-
		Naga Sakti Estate	2010		Certified
		Naga Sakti Estate (HGU on process – 59.79 Ha)	2022		-
		Rama Bakti Estate	2010		Certified
Kijang Mill (PT Buana Wiralestari Mas)	2010	Kijang Estate	2010	Riau Province	Certified
		Kijang Estate (HGU on process – 56.07 Ha)	2022		-
		Kijang Kencana Plasma	2010		Certified
Ramarama Mill (PT Ramajaya Pramukti)	2010	Ramarama Estate	2010	Riau Province	Certified
		Ramarama Estate (HGU on process – 318.76 Ha)	2022		-
		Amartajaya Plasma	2010		Certified
		Smallholder (Ramarama KKPA)	2023		-
		Berkat Ridho KKPA	2023		-
		Produsen Rama Sawit KKPA	2023		-
Indrasakti Mill (PT	2011	Indralestari Estate	2011	Riau Province	Certified

Meganusa Inti Sawit)		Indrasakti Estate	2011		Certified
		Indragiri Plasma	2011		Certified
		Indrasakti Plasma	2011		Certified
		Mandian jaya KKPA	2022		Audited
Bumipalma Mill (PT Bumipalma Lestari Persada)	2012	Bumi Lestari Estate	2012	Riau Province	Certified
		Bumi Palma Estate	2012		Certified
		Bumi Sentosa Estate	2012		Certified
		Bumi Palma Estate (HGU on process – 39.21 Ha)	2022		-
		Kharisma Estate (PT Kharisma Riau Sentosa Prima)	2024		-
		Kharisma Plasma (PT Kharisma Riau Sentosa Prima)	2024		-
Sawita Mill (PT Sawitakarya Manunggul)	2022	Sawita Estate	2022	Kalimantan Selatan Province	ST-1
		Pamukan Estate	2022		ST-1
		Sawita KKPA	2024		ST-1
Kenari Mill (PT Bangun Nusa Mandiri)	2025	Gaharu Estate (PT Bangun Nusa Mandiri)	2025	Kalimantan Barat Province	-
		Kenari Estate (PT Bangun Nusa Mandiri)	2025		ST-1
		KerANJI Estate (PT Bangun Nusa Mandiri)	2025		ST-1
		Smallholder (Gaharu Plasma)	2025		-
		Smallholder (Kenari Plasma)	2025		-
Sungai Air Jernih Mill (PT Bahana Karya Semesta)	2023	Sungai Air Jernih Estate	2023	Jambi Province	-
		Sungai Mentawak Estate	2023		-
		Sungai Mentawak KKPA	2023		
		Sungai Merak Estate	2023		-
		Sungai Badak Estate	2023		-
Sungai Perak Mill (PT Kruing Lestari Jaya)	2024	Sungai Perak Estate	2024	Kalimantan Timur Province	-
		Sungai Basung Estate	2024		-
		Sungai Pikan Estate	2024		
		Sungai Pilos Estate	2024		-
		Sungai Pikan Plasma	2024		
Sungai Kedang Mill (PT Harapan Rimba Raya)	2024	Sungai Kedang Estate	2024	Kalimantan Timur Province	-
		Sungai Tohan Estate	2024		-
		Kedang Pahu Estate	2024		-
		Sungai Pahu Estate (PT Rimba Rayatama Jaya)	2024		-
		Sungai Tohan Plasma	2024		

		Sungai Pahu Plasma (PT Rimba Rayatama Jaya)	2024	
	<p><i>TBP revised on 19 May 2022 and approved by RSPO on 14 June 2022</i></p> <p>There is revision of timebound plan on 19 May 2022 made by Head of Operations Sustainability. There are justification for mills and estates that postpone, with explanation:</p> <ul style="list-style-type: none"> • Pandawa KKPA supply base of Muara Kandis Mill is postponed to 2024 due to the SHM process. • Tanjung Rusa KKPA supply base of Tanjung Kembiri Mill is postponed to 2024 due to the SHM process. • Tanjung Sawit Estate dan Tanjung Sawit KKPA (PT Palmindo Biliton Berjaya) are postponed to 2024 due to still in process for HGU and land rights (SHM) • Kasuari Mill and supply bases are postponed to 2023 due to still in process of EIA (AMDAL) revision and permit for hazardous waste warehouse • Pekawai Mill and supply bases are postponed to 2022 due to pandemic covid-19 so that on-site audit in 2021 cannot be implemented • Kayung KKPA supply base of Pekawai Mill are postponed to 2024 due to still in process for land rights (SHM). • Kenanga Estate (PT Cahaya Nusa Gemilang) dan Delima Estate (PT Kencana Graha Permai) are postponed to 2024 due to pandemic covid-19 so that on-site audit in 2021 cannot be implemented. • Kencana KKPA and Kenanga KKPA supply base of Kenanga Mill are postponed to 2024 due to still in process for land rights (SHM). • Perdana Mill and supply bases are postponed to 2025 due to still in process for HGU • Kuayan Mill and supply bases are postponed to 2025 due to still in process for HGU • Belian Mill and supply bases are postponed to 2022 due to pandemic covid-19 so that on-site audit in 2021 cannot be implemented. • Belian KKPA, Muara Tawang KKPA and Kapuas Hulu KKPA supply base of Belian Mill are postponed to 2024 due to still in process for land rights (SHM). • Sungai Kupang KKPA supply base of Sungai Kupang Mill is postponed to 2024 due to still in process for land rights (SHM). • Sungai Kikim Mill and supply bases are postponed to 2022 due to still in process of EIA (AMDAL) revision. • Tangar Mill and supply bases are postponed to 2025 due to still in process for HGU. • Sungai Magalau Mill and supply bases and supply bases are postponed to 2023 due to still in process for HGU and RaCP (LUCA review). • Jalemo Mill and supply bases are postponed to 2023 due to still in process for HGU and RaCP (LUCA review). • Sako Mill and supply bases are postponed to 2025 due to still in process for HGU. • Medang Sati Estate (PT Saya Kisma Usaha) supply base of Hanau Mill are postponed to 2025 due to still in process for HGU. • Jak Luay KKPA and Bukit Subur KKPA supply base of Jak Luay Mill are postponed to 2023 due to still in process for land rights (SHM). • Gunung Kombeng KKPA supply base of Gunung Kombeng Mill are postponed to 2023 due to still in process for land rights (SHM). • Rantau Panjang KKPA supply base of Rantau Panjang Mill are postponed to 2023 due to still in process for land rights (SHM). • Tiga Serumpun KKPA supply base of Pelakar Mill are postponed to 2024 due to still in process for land rights (SHM). • Batang Gading Estate supply base of Langling Mill are postponed 2023 due to still in process for RaCP (LUCA review). • Batang Gading KKPA supply base of Langling Mill are postponed to 2024 due to still in process for land rights (SHM). • Kilis KKPA supply base of Sungai Bengkal Mill are postponed to 2024 due to still in process for land rights (SHM). • Bukit Kapur Mill and supply bases are postponed to 2025 due to still in process for HGU. • Rama-Rama KKPA are postponed to 2023 due to still in process for land rights (SHM). • Sawita Mill and supply bases are postponed to 2022 due to still in process for HGU. • Sawita KKPA supply base of Sawita Mill are postponed to 2024 due to still in process for land rights (SHM). 			

- Kenari Mill and supply bases are postponed to 2025 due to the process for RaCP (LUCA review).
- Sungai Air Jernih Mill and supply bases are postponed to 2023 due to still in process for legality documents.

Then there are additional units in 2022 with the acquisition by GAR of 2 mills and 16 Estates (11 own estates and 5 plasma/KKPA) and have been included in the timebound plan to be certified in 2023, with the following details:

1. PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA.
2. PT Harapan Rimba Raya: Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA.
3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA which will be supply base for Sungai Kedang Mill (PT Harapan Rimba Raya).
4. PT Agrolestari Subur Sejahtera (previously the company name is PT Bumi Permai Surya Lestari): Bukit Permai Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified.
5. PT Agrolestari Hijau Sentosa (previously the company name is PT Bumi Bangka Lestari): Bukit Lestari Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified.
6. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be supply base for Bumipalma Mill (PT Bumipalma Lestari Persada) which has been certified.
7. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be supply base for Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa).

There are some companies that are not fully certified, due to some area still on process to get land title (HGU) and RaCP process, consist of:

- PT Sawit Mas Sejahtera (Sawit Mas Estate)
- PT Bumi Sawit Permai (Bumi Sawit Estate)
- PT Djuandasawit Lestari (Muara Kandis Estate & Muara Tawas Estate).
- PT Forestalestari Dwikarya (Tanjung Rusa Estate);
- PT Sumber Indah Perkasa (Sungai Merah Estate and Sungai Buaya Estate).
- PT SMART Tbk (Kinta Pura Estate)
- PT Tapian Nadenggan (Long Buluh Estate and Bukit Subur Estate)
- PT Ivomas Tunggal (Samsam Estate, Kandista Estate, Nenggala Estate, Sei Rokan Estate, Ujung Tanjung Estate);
- PT Buana Wiralestari Mas (Nagasakti Estate; Nagamas Estate and Kijang Estate);
- PT Rama Jaya Pramukti (Ramarama Estate);
- PT Satya Kisma Usaha (Sungai Bengkal Estate, Kilis Estate and Sungai Bengkal KKPA)
- PT Bumipalma Lestari Persada (Bumi Palma Estate)
- PT Tapian Nadenggan (Sei Rindu Estate)

1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard
	Pandawa Plasma is full managed by the company and planned to be certified in 2024.

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.1	<p>1. 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 in 2016, RSPO P&C Lead Auditor Course in 2018, RSPO Supply Chain Certification Lead Auditor Course in 2020, SA 8000 Awareness in 2018, Quality Management Systems (ISO 9001:2015) in 2016, Environmental Management Systems (ISO 14001:2015) in 2017, OHS General Expert in 2013, OHSAS 18001:2007 in 2017, ISO 19011:2018 in 2019, ISO 17021:2011 and ISO 17065:2012 in 2016. During this audit, he assigned to verify legal aspect, land dispute, SCCS, Partial Certification & Time Bound Plan.</p> <p>2. 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 Best Management Practice and HCV.</p> <p>3. 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 Worker Welfare & OHS.</p> <p>4. Helma Namira (Auditor Trainee). Indonesian citizen, Bachelor of Science, majoring in Biology, University of Indonesia. Has 2 years experiences working in Health Safety Security Environment (HSSE) Refinery in one of Oil & Gas Company in Indonesia. Attended trainings are Awareness ISO 19011: 2018; Awareness ISO 9001:2015, Awareness ISO 17021:2015, IHT Awareness ISO 17065:2012, IHT Awareness ISO 14001:2015, IHT Awareness IHT ISO 45001:2018, IHT Awareness ISPO P&C Certification System, and IHT Awareness RSPO. During this audit, will verify for Environment, GHG, and social aspects under supervised by Lead Auditor.</p> <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1.1	<p>Number of auditors: 3 auditors and 1 trainee auditor</p> <p>Number of days for ASA-1.1 at site: 5 days</p> <p>Number of working days for ASA-1.1 at site: 15 Working days</p>
2.2.2	Assessment Process
ASA-1.1	<p>The assessment was conducted by measuring the implementation of certification system and standard conducted by PT Djuandasawit Lestari based on:</p> <ul style="list-style-type: none"> RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20th April 2020 RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020 <p>The 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; (3) Field observation, aiming to confirm the bigger picture of what was informed by two methods as mentioned before. Some opportunities for improvement of the results ASA 1.1 by the MUTU auditor to the management unit and the</p>

	<p>results are the subject will be verified at the next assessment phase ASA 1.2. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA 1.1 Audit report.</p> <p>The opening meeting was held on Monday 20 June 2022 at 16.00 pm through a teleconference (Microsoft teams meeting). As for the participants who attended the opening meeting included the Estate Manager, Mill Manager, Support Team from Sustainability Department and other relevant staff Supported Team Jakarta and other staff at PT DSL. While the closing meeting will take place on 24 June 2022 at 08.00 pm. attended by the same participants as the opening meeting. Management PT DSL accept all this audit results.</p> <p>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. A list of Stakeholders contacted is included as Appendix 1.</p> <p>The assessment program please find Appendix 2.</p>
2.2.3	Locations of Assessment
ASA-1.1	<p>The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>Muara Kandis Mill</p> <ul style="list-style-type: none"> • 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. • Empty bunch area. Field observations related to empty bunch 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. • Pos security. Observation and interview related to OSH, worker welfare, and ethic. • Weighbridge. Observation and interview related to work procedure, OSH, worker welfare, and ethic. • Sortation. Observation and interview related to work procedure, OSH, worker welfare, and ethic. • Sterilizer. Observation and interview related to work procedure, OSH, and worker welfare. • Engine room. Observation and interview related to work procedure, OSH, and worker welfare. • Kernel station. Observation and interview related to work procedure, OSH, and worker welfare. • Boiler station. Observation and interview related to work procedure, OSH, and worker welfare. • Empty Bunch Area. Observation for solid waste management and OHS aspect. • Water source. Observation of the condition of water source management and monitoring • Hazardous waste temporary storage. Field observations and interview related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse. • Water Treatment Plant. Observation and interview related to OHS implementation, worker welfare, water management and monitoring of water use. • Workshop. Observation and interview related to OHS implementation, worker welfare, training and machine maintenance. • Hazardous Material Storage. Observation and interview related to hazardous material store • Hydrant simulation. Observation of preparedness of fire emergency response teams and preparedness of emergency response devices. • Fertilizer storage. Observation and interview related to OSH, worker welfare and waste management

- **Fuel tank.** Observation and interview related to OSH, worker welfare and waste management
- **Generator House** Observation and interview related to OSH, worker welfare and waste management

Muara Kandis Estate

- **Block L16 Division 4: HGU Pole No. 47.** Observation the conditions and position of legal boundary.
- **Block L17 Division 4: HGU Pole No. 48.** Observation the conditions and position of legal boundary.
- **Block L21 Division 3: HGU Pole No. 51.** Observation the conditions and position of legal boundary.
- **Block L23 Division 3: HGU Pole No. 53.** Observation the conditions and position of legal boundary.
- **Block J23/24 Division 3 (HCV Area – Temani River).** Observation of HCV management.
- **Block K23 Division 2 (6 Pesticide Applicator).** Observation on safe working practices and interview with the spraying workers related type of pesticides use according to the procedure and also worker welfare.
- **Block K34 Division 2 (4 harvester and 4 losefruit picker).** Observation and interview with harvester related fruit ripeness, safe working practices and also worker welfare.
- **Block K34 Division 2 (Barn Owl Nest Observation).** To check barn owl nest condition and interview with the officer related procedure monitoring the barn owl nest and the owl.
- **Housing Division 3.** Observation for domestic waste management, OHS, worker facilities
- **Mixing and agrochemical / fertilizer container washing store Division 3.** Observation related OHS, and agrochemical waste management.
- **Rinse house for spraying team Division 3.** Observation for OHS and spraying team facilities
- **Daycare Division 3.** Observation for OHS and worker facilities
- **Hazardous Waste Temporary Storage.** Observations and interviews with officers related to material handling, work procedures, OHS, wages and environmental management.
- **Land application, Block 33 and 34 divisi 2,** observation on the practice of POME land application and its monitoring
- **Fertilizer storage.** Observation and interview related to OSH, worker welfare and waste management
- **Workshop.** Observation and interview related to OSH, worker welfare and waste management
- **Fire-fighter equipment and Simulation.** Observation and interview related to emergency response mechanism
- **Fuel tank.** Observation and interview related to OSH, worker welfare and waste management
- **Agrochemical central storage.** Observation and interview related to OSH, worker welfare and waste management
- **Generator House** Observation and interview related to OSH, worker welfare and waste management
- **Landfill Block J25 Division 3.** Observation waste management

Muara Tawas Estate

- **Block T52 Division 1: HGU Pole No. 85.** Observation the conditions and position of legal boundary.
- **Block S60 Division 2: HGU Pole No. 89.** Observation the conditions and position of legal boundary.
- **Block S62 Division 2: HGU Pole No. 90 and 91.** Observation the conditions and position of legal boundary.
- **Block R52 Division 1: HGU Pole No. 141 and 142.** Observation the conditions and position of legal boundary.
- **Block T57 Division 2 (HCV Area – Petanang River).** Observation of HCV management.
- **Housing No 1 & 2.** Observation for domestic waste management, OHS, worker facilities
- **Mixing and agrochemical / fertilizer container washing store.** Observation related OHS, and agrochemical waste management.
- **Rinse house for spraying team.** Observation for OHS and spraying team facilities
- **Daycare.** Observation for OHS and worker facilities
- **Hazardous Waste Temporary Storage.** Observations and interviews with officers related to material handling, work procedures, OHS, wages and environmental management.
- **Fertilizer storage.** Observation and interview related to OSH, worker welfare and waste management
- **Workshop.** Observation and interview related to OSH, worker welfare and waste management
- **Fire-fighter equipment and Simulation.** Observation and interview related to emergency response mechanism
- **Fuel tank.** Observation and interview related to OSH, worker welfare and waste management
- **Agrochemical central storage.** Observation and interview related to OSH, worker welfare and waste management
- **Generator House** Observation and interview related to OSH, worker welfare and waste management
- **Landfill Block R48 Division 1.** Observation waste management

	<ul style="list-style-type: none"> • Petanang river, Block N58/N59 Division 3 and Block K/L 54 Division 4. Observation related HCV 1.1 and 4.1. • Harvesting and FFB loading, Block K51, Division 4. Observation and interview related to work procedure, OSH, and worker welfare. • Spraying, Block L51, Division 4. Observation and interview related to work procedure, OSH, worker welfare, and environment. • Barn Owl Box, Blok L51, Division 4. Observation related IPM. • Beneficial plant, <i>Turnera subulata</i> and <i>Antigonon leptopus</i>, Block K/N 58-59 Division 3 and Block K/L 50 Division 4. Observation related IPM.
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1.1	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Djuandasawit Lestari was held by:</p> <ul style="list-style-type: none"> • Public Notification in website MUTU International on 27 May 2022. • Public consultation with NGOs (by email) such as WALHI, WWF, AMAN and Sawit Watch on 14 June 2022. • Public consultation meeting with government institution on 21-22 June 2022. • Public consultation meeting with previous land owners and communities on 21 June 2022. • Public consultation meeting with internal stakeholders and contractor on 21-23 June 2022 <p>Numbers of input from stakeholders were clarified by PT Djuandasawit Lestari.</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next assessment (ASA-1.2) will be conducted eight (8) months to twelve (12) month this assessment.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

Mutuagung Lestari has conducted an assessment of Muara Kandis Mill – PT Djuandasawit Lestari subsidiary of Golden Agri Resources Ltd operation consisting of one (1) palm oil and two (2) estates.

During the assessment, there are no nonconformity identified on this assessment.

MUTUAGUNG LESTARI found that Muara Kandis Mill – PT Djuandasawit Lestari subsidiary of Golden Agri Resources Ltd complied with the requirements of **Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.**

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

Ref Std.	VERIFICATION RESULT of MUTU-CERTIFICATION
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY	
1.1	The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.
1.1.1	<p>The company has a list of information/documents that can be accessed and/or shared with stakeholders such as government agencies and NGOs which are presented in the Information List for Stakeholders document with document number F/SMART/GENERAL/SADV/004/003 rev 0.0 on 5 January 2022. Several types of information contained in the document include the following:</p> <ul style="list-style-type: none"> • Number of employees and list of basic wages of employees • Data on Taxpayer Identification Number (NPWP) • Payment of local taxes/levies • Environmental documents • Deed of establishment & amendments, area and production data, and application data • Proof of land tenure • High Conservation Value (HCV) Identification Report • Social Impact Assessment (SIA) Identification Report • Report of the Committee for Occupational Safety and Health (P2K3) • Continuous improvement program document • RSPO Audit Report Document • Human Rights Policy Document • Details of Complaints and Complaints • Negotiation Procedure • Estate Drainage Map <p>Based on the explanation above, the company already has a list of documents that can be accessed by stakeholders and the public.</p> <p>In addition, the company also has procedural documents related to communication and consultation which are listed in the Communication and Consultation SOP document issued by the Sustainability Division with the number SOP/SMART/GENERAL/SADV/004 on July 1 of 2014 and was approved by the Head Up Stream and Sustainability Division Head. The procedure describes the process and flow of information delivery as well as the mechanism for responding to information from both internal and external parties.</p>

Based on the results of public consultations from the Environmental Agency of Musi Rawas District, the company has provided information as needed and contained in a document of the type of information that can be submitted to the relevant agencies properly, cooperatively, as is and transparently, without hiding any information. The DLH stated that so far the communication between the Service and the company has not had any obstacles or obstacles, so it is easy to monitor the company's compliance in terms of environmental management.

1.1.2

Companies can show records of providing information to relevant agencies in the form of routine reports, for example:

Plantation Legality

- Plantation progress report (LPUP) of PT Djuandasawit Lestari period of Semester II of 2021 has been sent to Plantation Agency of Musi Rawas District on 8 March 2022.
- HGU utilization report of PT Djuandasawit Lestari for the period of 2021 has been sent to Land Agency of Musi Rawas District on 13 April 2022.
- The report on the implementation of fire prevention and control was reported to the Plantation Office of Musi Rawas District on January 27, 2022.

Environment Regulation

The unit of certification can show evidence that information has been received in an appropriate form and language related to stakeholder involvement, company rights and obligations that are conveyed to all relevant stakeholders, including:

- Receipt for reporting RKL/RPL documents for semester 1 of 2021, through SIMPEL with ID TTE Number 1625102726-2005 which was reported to KLHK on July 1, 2021 and has been known by the Environmental Service of Musi Rawas District, Sumatera Selatan Province.
- Receipt for reporting the RKL/RPL document for semester 2 of 2021, through SIMPEL with ID TTE Number 1642216106-2005 which was reported to KLHK on January 15, 2022 and has been known by the Environmental Service of Musi Rawas District, Sumatera Selatan Province.
- Receipt of LB3 Management report for Quarter III 2021 dated October 25, via SIMPEL with TTE ID Number: 1635925436-522 which is reported to the Sumatera Selatan Provincial Environmental Service.
- Receipt of the LB3 Management report for Quarter IV 2021 dated January 31, 2022, via SIMPEL with ID TTE Number: 1644637376-20005 which is reported to the South Sumatra Provincial Environmental Service.
- Receipt of the first Quarter 2022 LB3 Management report dated April 9, 2022, through SIMPEL with TTE ID Number: 1648780383-2005
- Receipt of the Pollution Control Report Quarter III of 2021 on October 10, 2021, through SIMPEL with TTE ID Number: 165411522-2005
- Receipt of the Pollution Control Report Quarter IV 2021 on January 31, via SIMPEL with ID Number TTE:165411473-2005
- Receipt of the first Quarter 2022 Pollution Control report on April 9, 2022, via SIMPEL with TTE ID Number: 1648780325-2005
- Receipt for reporting the report on the Implementation of Management and Monitoring of PT Djuandaawit Lestari's High Conservation Value Areas in 2021 which was reported to the Environmental Service of Musi Rawas District, Sumatera Selatan Province on 17 June 2022.
- Receipt for reporting on the Implementation Report on the Management and Monitoring of PT Djuandaawit Lestari's High Conservation Value Area in 2021 which was reported to the Natural Resources Conservation Center (BKSDA) of Musi Rawas District, Sumatera Selatan Province on 17 June 2022.

1.1.3

The Certification Unit in responding to and serving requests for information from stakeholders, always records as records responses and services to requests for information in the Incoming and Outgoing Letter Book.

The book has described the information needed, the source of the request, and other information. However, from January 2021 to April 2022 there were no requests for information from relevant stakeholders, the incoming letters were only invitation letters, notifications/appeals, and proposals for funding/assistance requests. Meanwhile, the outgoing letter records consist of Notification Letters for Compilation of Compulsory Company Reports to relevant Stakeholders, in this case, government agencies.

Based on this description, the unit of certification has properly documented all incoming requests for information along with responses

to these requests.

1.1.4

The Certification units have list or information which is available for public and/or relevant stakeholders presented in appropriate languages (Bahasa) and forms. The documents and information referred to include worker welfare aspects, legality aspects, social aspects, best practices management aspects, environmental aspects, and transparency aspects. The document also conveys the procedures for correcting incorrect information (information issues) that have been developed, recordings of providing information to relevant agencies and stakeholders, guidelines, and explanations regarding the confidentiality of information to the targeted party.

Aside from that, certificate unit is known to have a Communication and Consultation SOP "that applies to the 2014 Sustainability Division No. SOP/SMART/UMUM/SADV/II/004 on July 1, 2014 approved by the Head Up Stream and Sustainability division Head. The procedure is provided for reference that explains the process of information sharing/dissemination. The document stipulates procedures for the flow of giving and response of information from both internal and external stakeholders. Each incoming letter must be planned for response by the unit head no later than 3 weeks after the letter is received.

Based on the descriptions and explanations above, it can be concluded that if the certification unit has provided adequate information to relevant stakeholders regarding the environment, social and legal matters relevant to the RSPO criteria, in the appropriate language and form, so that participation can be carried out effectively in decision making.

1.1.5

The Certification Unit has an updated list of stakeholders for PT DSL consisting of legal entities or government agencies, indigenous peoples, local communities, workers' organizations, smallholders, FFB suppliers' independent services, and NGOs. The document has been completed with the contact information of the PIC who can be contacted on the stakeholder list. The list of stakeholders is listed in the PT Djuandasawit Lestari Stakeholder List Document updated on June 21, 2022, and is also contained in the Information Document for Stakeholders with Number F/SMART/UMUM/SADV/0/04/003 Rev.0.0 dated January 5, 2022.

The stakeholders listed in the list of stakeholders belonging to the company have included internal and external stakeholders, including the following:

- Musi Rawas District Environment Agency
- Transmigration Service
- Department of Agriculture
- Provincial BAPPEDA
- Central Bureau of Statistics (*Badan Pusat Statistik*)
- Manpower
- Provincial Environment Agency
- Local Village Government
- Plantation Service
- Local Contractors
- External FFB Suppliers
- NGOs
- Gender Committee
- Labor union
- Employee Cooperative
- Plasma
- Nearby Farmers
- Etc

During the audit, the auditor team has been contacted nominated stakeholders to verify several issues regarding palm oil plantations and the information listed in the list is appropriate, such as contact numbers, names, and positions.

The PIC for consultation and communication with the community is manager of each unit. The PIC is assigned to accommodate the implementation of social impact analysis, responsible for top management for communication and consultation with stakeholders Officers.

Based on the descriptions and explanations above, it can be concluded that the certification unit has provided adequate information to relevant stakeholders regarding the environment, social and legal matters relevant to the RSPO criteria, in the appropriate language and form.

Status: Comply

1.2

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

1.2.1

The company has documents related to the code of ethics for business implementation, prevention, and eradication of money laundering, eradication of corruption and corruption prevention and eradication which are legalized by the management of Plantation Business Actors. This policy is contained in a document entitled Sinarmas Agribusiness and Food Business and Human Rights Policy which was ratified on 12 December 2019 by the Head of Policy and Compliance Division. The policy consists of 11 commitments implemented by the company in running the business as follows:

- Respect the rights and dignity of workers in accordance with legal provisions, provide fair treatment without discrimination and build harmonious industrial relations
- Respect workers' rights in terms of freedom of opinion, collective bargaining, as well as forming and joining trade unions/labor unions
- Prevent forced labor practices and not use workers resulting from human trafficking
- Ensure that no child labor is employed in all lines of operation
- Ensure the safety of the company's work environment and operation
- Recognizing the equal rights and participation of women around operating units
- Creating safe and healthy working conditions and providing environmental protection
- Respect the rights of local and customary communities in accordance with the prevailing laws and regulations where the company operates
- Respect and protect the rights of whistleblowers and human rights defenders
- Comply with legal provisions regarding the prevention of bribery and corruption practices
- Take steps to resolve and recover from negative impacts in accordance with the prevailing laws and regulations where the company operates in the event of human rights violations

In addition, the company also has a GAR Social and Environmental Policy (GSEP) which was approved on September 8, 2015 by the Head of Upstream, CEO of Down Stream & Commercial, Executive Director & CFO and MD of Sustainability & SSE which explains about the code of integrity and business ethics. Meanwhile, policies related to the prevention and eradication of money laundering, the eradication of criminal acts of corruption and the prevention and eradication of corruption can be found in the Code of Ethics book belonging to the Golden Agri-Resources Ltd group. In the Code of Ethics, it is stated in the point "39. Upholding Integrity for Business Partners" in the "Rejecting Bribery and Corruption" section, it is stated that the company complies with the legal provisions regarding the prevention of bribery and corruption practices that apply in every country wherever the company conducts business processes. Then in the next section at the same point, namely in the "Anti-money laundering" section it is stated that the Company complies with all laws that prohibit money laundering or funding for illegal or illegal purposes, the company is not allowed to conduct transactions involving funds originating from activities criminal activities such as fraud/terrorism/drug sales, and companies making sure to do business with reputable customers or business partners for legitimate purposes with legitimate funds.

The policy has been conveyed to the parties, whether workers, contractors, or the community, for example through the Socialization of Business Ethics & Human Rights, KLSGG, HCV, Waste Management & Driving Safety on August 21, 2021.

Based on interviews with workers, plasma farmers, contractors, and village community representatives, it is known that the policy has been understood and implemented in all business operations and transactions.

1.2.2

The certification unit has a mechanism to monitor compliance and implementation of ethical business policies and practices through inspection and evaluation of employee compliance in all divisions or work sections. This inspection is carried out periodically through the Internal Audit of PT DSL, which will then be reviewed by the management of the company. The mechanism has been stated in the Company's Policy Document as mentioned in indicator 1.2.1.

The policy has been conveyed to the parties, whether workers, contractors, or the local community, for example through the

Socialization of Business Ethics & Human Rights, KSLG, HCV, Waste Management & Driving Safety on August 21, 2021.

Based on the results of interviews with representatives of company management, as well as through document review, it is known that the Certification Unit also has a Procedure for Submission and Handling of Complaints contained in the SOP for Handling Complaints and Dissatisfaction with no. Document: SOP/SMART/SIGS-CSR/SADV/II/003. Complaints and dissatisfaction from internal and external stakeholders are documented in the Grievance Handling Monitoring Book (F/SMART/SIGS-CSR/SADV/003/001 for internal and external) for the period 2020 - 2021. The majority of complaints from employees are related to housing damage, where all complaints have been handled by the company in accordance with procedures. In addition, it is also known that there were no complaints from external parties. As for the complaint recording period in 2022, no complaints or submissions of dissatisfaction have been found, either from internal or external stakeholders.

Based on interviews with MKNE and MTWE employees by telephone, it is known that employees have understood the complaints and grievance mechanisms that apply in the company. There are several complaints that are often submitted regarding housing infrastructure if there is damage, where complaints submitted have been responded to and handled by management.

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 PT Djuandasawit Lestari has a Plantation Business Registration Letter (SPUP) issued by the Minister of Agriculture and Forestry in accordance with Decree no. 107/Mentanhut-VII/2000 dated October 9, 2000 to PT Djuandasawit Lestari for oil palm cultivation activities covering an area of 10,958.4 Ha with a factory capacity of 60 Tons FFB/Hour located in Muara Lakitan and Muara Kelingi Sub Districts, Musi Rawas District, Province South Sumatra.

Best Management Practice

- The management unit already owns and uses pesticides registered with the Pesticide Commission.
- IPM activities according to the best IPM guidelines.
- Reporting on the Plantation Business Development Report of PT Djuandasawit Lestari Semester II of 2021 to the Plantation Agency of Musi Rawas District on March 8, 2022.

Compliance with Environment Regulation:

- The AMDAL (Environmental Impact Analysis) on behalf of PT Djuandasawit Lestari owned by the company has two documents, namely an initial Amdal document and the first Amdal addendum document made in 2018 in the form of an Environmental Evaluation Document for PT Djuandasawit Lestari's Plantations and Palm Oil Mills. The scope of the study from the AMDAL document is 14,000 hectares with a capacity of 60 tons of FFB/hour. The processing capacity listed in the environmental document is in accordance with the processing capacity listed on the factory signage (Muara Kandis POM). This AMDAL document has received approval from the minister of agriculture with decision number 29/ANDAL/RKL-RPL/BA/VIII/1998 which was approved on August 4, 1998.
- The company's RKL (Environmental Management Plan) and RPL (Environmental Monitoring Plan) have contained an environmental management and monitoring plan in accordance with the significant impacts that have been included in the AMDAL document as written in the previous point.
- The company has also conducted a re-environmental feasibility assessment aimed at assessing and updating new impacts and determining new management and monitoring plans. So as of December 28, 2018, the company has a new environmental document, namely the DELH document which covers an area of 14,662.77 Ha (there is an additional 380.08 Ha for Land Applications and an additional 3,828.65 plantation area from the previous document) with a capacity of 60 Tons/TBS. The DELH document on behalf of PT Djuandasawit Lestari was established on December 28, 2018 and issued on December 31, 2018 under Number 503/09/III/DPM-PTSP/2018 by the Head of the Investment and One Stop Service Office of Musi Rawas District.

- The company already has an environmental permit for its Plantation and Palm Oil Processing Mill activities on behalf of PT Djuandasawit Lestari with an area of 14,662.77 Ha with a capacity of 60 Tons of FFB/Hour in Muara Kelingi, Muara Lakitan, and Megang Sakti Sub Districts, Musi Rawas District. Based on the Decree of the Head of the Musi Rawas District Investment and One Stop Service Office Number: 10/KPTS/III/DPM-PTSP/2018 which was set on December 31, 2018.
- The company already has a Surface Water Use Permit in the form of a Decree of the Head of the One Stop Service and Integrated Service Number 0744/DPMPSTSP/V/XI/2019 dated 19 November 2019, regarding a Surface Water Intake and Utilization Permit (SIPPAIR) to PT Djuandasawit Lestari in the Regency Sane Music. The validity period of the permit is valid for 2 years until November 2021 and an extension has been carried out for the latest SIPPAAIR Permit in 2021. Based on the Technical Recommendation of the Water Resources Management Office Number 610/3769/DPSDA-BM/XII/2021 dated December 30, 2021 and a Certificate of Fulfilment of Requirements from the Office of Investment and One Stop Service Number 0100/DPMPSTSP.V/III/2022 issued on March 29, 2022, it is known that the company has extended the validity period of the Surface Water Use Permit.
- The company has a permit for temporary storage of Hazardous waste based on the Decree of the Head of the Office of Investment and One Stop Services of Musi Rawas District number 503/06/LB3/DPM-PTSP/VII/2019 regarding the extension of the permit for Hazardous waste management for the temporary storage of Hazardous waste. PT Djuandasawit Lestari dated July 16, 2019 which is valid for 5 years from the date of stipulation. Based on this permit, it is known that the coordinates of the temporary storage area for Hazardous waste are located in the Muara Kandis POM with coordinates S 02°55'06,3" and E 103°10'12.7" and in the Muara Kandis Estate S 02°55'06.1 " and E103°10'12.7".
- The company has a Hazardous waste temporary storage permit based on the Decree of the Head of the Musi Rawas District One Stop Service and Investment Office number 503/10/LB3/DPM-PTSP/XI/2019 regarding the extension of the Hazardous waste management permit for the temporary storage of Hazardous waste. PT Djuandasawit Lestari dated November 4, 2019, which is valid for 5 years from the date of stipulation. Based on this permit, it is known that the coordinates of the temporary storage area for Hazardous waste are located in Muara Tawas Estate with coordinates S 02°55'06,3" and N 103°10'12.7" and in Muara Kandis Estate S 02°55'06 ,1" and E 103°10'12.7".
- The company has a Liquid Waste Utilization Permit and an Extension of Liquid Waste Utilization Permit or Palm Oil Industrial Wastewater Utilization on Oil Palm Plantation Land owned by PT Djuandasawit Lestari with No. 456/KPTS/DLH/2017 dated July 6 2017. The document states that the Liquid Waste generated from the production operations of Muara Kandis POM PT Djuandasawit Lestari can be used for oil palm plantation land owned by PT Djuandasawit Lestari covering an area of 380.8 Ha at 15 points which specified in the permit. The company representative explained that regarding the validity period of the LA Permit which is almost expired, the company has coordinated with the Musi Rawas District Environmental Service that if there are changes related to the extent of the LA application, the company needs to renew or extend the permit into a related technical recommendation letter. The Land application permit is maximum this year (2022). However, based on information from the management unit the company did not make changes to the area of the Land application, so in accordance with the provisions of PP No. 22 of 2021, the permit is still valid as long as there are no changes related to the permit.

The company can also show evidence of environmental monitoring and management reporting to the authorized agency and documented in the following documents:

- Receipt for reporting RKL/RPL documents for semester 1 of 2021, through SIMPEL with ID TTE Number 1625102726-2005 which was reported to KLHK on July 1, 2021 and has been known by the Environmental Service of Musi Rawas District, Sumatera Selatan Province.
- Receipt for reporting the RKL/RPL document for semester 2 of 2021, through SIMPEL with ID TTE Number 1642216106-2005 which was reported to KLHK on January 15, 2022 and has been known by the Environmental Service of Musi Rawas District, Sumatera Selatan Province.
- Receipt of LB3 Management report for Quarter III 2021 dated October 25, via SIMPEL with TTE ID Number: 1635925436-522 which is reported to the South Sumatra Provincial Environmental Service.
- Receipt of the LB3 Management report for Quarter IV 2021 dated January 31, 2022, via SIMPEL with ID TTE Number: 1644637376-20005 which is reported to the Sumatera Selatan Provincial Environmental Service.
- Receipt of the first Quarter 2022 LB3 Management report dated April 9, 2022, through SIMPEL with TTE ID Number: 1648780383-2005
- Receipt of the Pollution Control Report Quarter III of 2021 on October 10, 2021, through SIMPEL with TTE ID Number: 165411522-2005
- Receipt of the Pollution Control Report Quarter IV 2021 on January 31, via SIMPEL with ID Number TTE:165411473-2005
- Receipt of the first Quarter 2022 Pollution Control report on April 9, 2022, via SIMPEL with TTE ID Number: 1648780325-2005

- Receipt for reporting the report on the Implementation of Management and Monitoring of PT Djuandasawit Lestari's High Conservation Value Areas in 2021 which was reported to the Environmental Service of Musi Rawas District, Sumatera Selatan Province on 17 June 2022.
- Receipt for reporting on the Implementation Report on the Management and Monitoring of PT Djuandasawit Lestari's High Conservation Value Area in 2021 which was reported to the Natural Resources Conservation Center (BKSDA) of Musi Rawas District, Sumatera Selatan Province on 17 June 2022.

Compliance with Manpower Regulation

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

- Reporting of Employment Report for PT Djuandasawit Lestari in 2021 via online on May 23, 2021 and must be reporting back on May 23, 2022.
- Reporting of Employment Report for PT Djuandasawit Lestari in 2022 via online on May 31, 2022 and must be reporting back on May 31, 2023.
- The implementation of the minimum wage in 2022 is in accordance with the Minimum Wage Decree of the Musi Rawas District established by the Governor of Sumatera Selatan in December 2021.
- Payment of overtime wages to workers in accordance with Decree of the Minister of Manpower No. 102 of 2004.
- Implementation of the structure and scale of wages for all levels of workers in accordance with Minister of Manpower Regulation No. 01 of 2017.
- Example of reporting work agreement with contract workers (PKWT) to the Manpower Office of Sumatera Selatan Province with number 560/03/NAKERTRANS/04/2022 in April 2022.

Compliance with OHS Regulation

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

- Establishment of P2K3 (OHS Committee) PT Djuandasawit Lestari (MKNM) which is registered/approved by the Manpower and Transmigration Office of Sumatera Selatan Province under SK 05/KPTS/NAKERTRANS/2019 dated September 17, 2019. The organization has a secretary, an OHS Expert who already has an Authority Card from Ministry of Manpower with register number 31102/PK3/AJ/31/2019/P1 with initials FK which is valid until December 23, 2022.
- Establishment of OHS Committee PT Djuandasawit Lestari (MKNE) which is registered/approved by the Manpower and Transmigration Office of Sumatera Selatan Province under SK 024/KPTS/NAKERTRANS/2022 dated May 10, 2022. The organization has a secretary, an OHS Expert who already has an Authority Card from Ministry of Manpower with register number 14694/PK3/AJ/31/2022/P2 with initials P which is valid until February 07, 2025.
- Establishment of OHS Committee PT Djuandasawit Lestari (MTWE) which is registered/approved by the Manpower and Transmigration Office of Sumatera Selatan Province under SK 024/KPTS/NAKERTRANS/2022 dated November 22, 2018. The organization has a secretary, an OHS Expert who already has an Authority Card from Ministry of Manpower with register number 55936/PK3/AJ/31/2022/P1 with initials NWS which is valid until February 07, 2025.
- Provision of PPE for free to all workers and arrange the use of PPE according to the type of work based on the free predetermined HIRAC
- Have permits for all factory operating machines that have been tested for eligibility according to applicable regulations.
- Has a license / competency for some special jobs that require more expertise such as OHS experts, hyperkes, boiler operators, diesel engine operators, welder, wheel loader operators and others in accordance with the requirements contained in the legislation.
- Report of the OHS Committee MKNE Quarter 1 2022 to the Manpower and Transmigration Office of Sumatera Selatan Province on April 16, 2022.
- Report of the OHS Committee MKNM Quarter 1 2022 to the Manpower and Transmigration Office of Sumatera Selatan Province on April 17, 2022.
- Report of the OHS Committee MTWE Quarter 1 2022 to the Manpower and Transmigration Office of Sumatera Selatan Province on April 27, 2022.

2.1.2

Procedure of legal requirement which presented in document SOP/SMART/UMUM/SADV/I/002, dated 1 July 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. Internal audit of regulations compliance is conducted annually as example on 30 August -

3 September 2021 in PT Djuandasawit Lestari. 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. SOP/SMART/CERS-EHSD/SADV/I/004 dated 1 July 2014. Procedure mentioned that maintenance was carried out by foreman with supervision of Assistant Manager. Monitoring the boundaries of the HGU is done every 3 months.

The company shows the HGU stake monitoring document which is carried out every 3 months. The last HGU stake monitoring was carried out for example in April 2022 at Muara Kandis Estate and Muara Tawas 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 Muara Kandis Estate (Stakes No. 47, 48, 51 and 53) and Muara Tawas Estate (Stakes No. 85, 89, 90, 91, 141 and 142), 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

The CH shows the 2022 Contractors List at PT DSL, namely PT SJA (Satrindo Jaya Agroplasma) that have 88 workers, which is engaged in the transportation of FFB and loose fruit from MKNE and MTWE to MKNM. The CH also shows the SPK (Work Agreement) with PT SJA, numbered 006/DSL/JKTO-II/XII/2019 dated December 02, 2019. The Work Agreement is valid from January 2, 2020 until December 31, 2024. The CH has a list of contacts such as FFB suppliers, hazardous waste contractor, machineries maintenance in mill.

Based on interviews with contractors and review of contractor and company documents, it is known that in the period of May 2022 SJA contractors have 88 workers Meanwhile, MKNM has 123 workers, MTWE 363 workers, and MKNE 528 workers.

The CH shows data on external FFB suppliers to MKNM updates March 2022, as follows:

1. Pendawa Plasma (Full Managed)
2. PT Citraloka Bumi Bengawa
3. PT Daya Agro Lestari
4. PT Anugrah Agung Amanah
5. PT Sadar Sejahtera Bersama
6. Maulana Malik S (BUMDes)

2.2.2, 2.2.3

The CH states that all Work agreements with other parties, including contracts with FFB suppliers, have separate clauses regarding the fulfillment of relevant legal obligations. This is shown in the work contract and the statement letter of the contractor in collaboration with the company, including:

- Work agreement with PT SJA, numbered 006/DSL/JKTO-II/XII/2019 already has clauses related to the obligation to pay taxes, management and payment of BPJS Health and Employment for workers, payment of wages according to labor regulations, age of workers over 18 years, complete the PPE according to the provisions.
- PT SJA's Statement Letter, dated May 15, 2020, among others, states that they will not bribe, comply with business ethics, do not perform forced labor, do not employ children under 18 years of age, do not employ workers originating from human trafficking, comply with laws and regulations related to OHS aspects, the environment, licensing, legality, employment, and conditions required in sustainable palm oil certification.
- Statement of FFB supplier Maulana Malik Sofyana dated April 20, 2020, which states that the FFB sold is FFB cultivated in accordance with the requirements and provisions of the applicable laws and regulations.

The CH has evaluated the contractor. For example with the SJA contractor which was conducted on January 5, 2022. The assessment was carried out in terms of performance quality, timeliness of completion, compliance with labor regulations and business ethics, accuracy of OHS implementation, housekeeping, and compliance with environmental regulations. The assessment received a score with the category of "Good" and it is recommended to extend the contract if necessary.

Status: Comply

2.3

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

2.3.1

The Certification Unit can show a list of suppliers who send FFB to MKNM. The following is FFB supplier data from outside the scope of certification for the 2022 period, including:

No	Supplier Name	Supplier Address	RSPO Status	Coordinate	Land Status
1	PNDA (Pandawa Plasma) (SSD Plasma under PNDA) Small Farmers Group: KTGA KTRA KTSA KTNA KTJA	KTGA: Tugu Sampurna Village KTRA : Karya Sakti Village KTSA: Beliti Jaya Village KTNA : Karya Mukti Village, Beliti Jaya Village KTJA: Karya Mukti Village, Petrans Jaya Village, Muara Kelingi Sub District, Musi Rawas District	Non-Certified	S 2°54'07.24" E 103°12'41.06"	Regent's Decree
2	CBBX (PT. Citraloka Bumi Begawan)	Semangus Village, Muara Lakitan Sub District, Musi Rawas District	Non-Certified	S 3°3'55.83" E 103°20'48.58"	HGU
3	DALX (PT. Daya Agro Lestari)	Semangus Village, Muara Lakitan Sub District, Musi Rawas District	Non-Certified	S 2°56'76" E 103°21'411"	HGU
4	PAAX (PT Anugrah Agung Amanah) *Local Community FFB	Pelita Jaya Village and Marga Baru Village, Muara Lakitan Sub District, Musi Rawas District	Non-Certified	S 02°48'32.4" E 103°11'102.9"	SHM, SKT, SPPH
5	SSBX (PT Sadar Sejahtera Bersama) * Local Community FFB	Beliti Jaya Village, Muara Lakitan Sub District, Musi Rawas District	Non-Certified	S 2°96'69" E 103°15'74"	SHM, SKT, SPPH
6	Maulana Malik S (MMSX) * Local Community FFB	Petrans Jaya Village, Muara Kelingi Sub District, Musi Rawas District	Non-Certified	S 2°91'65" E 103°15'14"	SHM, SKT, SPPH

Based on the data above, it is known that the FFB suppliers to Muara Kandis POM come from the Own Plantation and Group Plantation and Middleman FFB suppliers outside. The delivery method for outside FFB is not based on individuals but goes through the FFB supplier middleman who represents the individual (in this case as an agent). The contract made is between the company and the middleman. The management unit can show the Traceability Declaration Document – Traceability to Plantation. Document created by Middleman supplier FFB. The types of data contained in the document include Smallholder ID, owner name, legal rights, village location, sub-district, provincial district, geolocation, year of planting, ISPO & RSPO certification status, area, and an average number of FFB shipments.

2.3.2

The company can show data from all indirect FFB suppliers in collaboration with Middleman FFB Suppliers equipped with evidence that the indirect FFB suppliers already have legality on the managed land, for example, PT Anugrah Agung Amanah (PAAX) has 57 supplier farmers. The following are some samples of supplier farmers who send FFB to middlemen on behalf of PT ANugrah Agung Amanah (PAAX) as follows:

No	Supplier Name	Supplier Address	Ha	RSPO Status	Coordinate	Land Status
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1	Boymin	Petrans Jaya Village, Muara Kelingi Sub District, Musi Rawas District	80	Non-Certified	S 2°91'65" E 103°15'14"	SHM
2	Okta	Petrans Jaya Village, Muara Kelingi Sub District, Musi Rawas District	10.5	Non-Certified	S 2°91'65" E 103°15'14"	SHM
3	Dian	Karya Mukti Village, Muara Lakitan Sub District, Musi Rawas District	7	Non-Certified	S 02°56'55.19" E 103°06'59.99"	SHM
4	Ani	Karya Sakti Village, Muara Lakitan Sub District, Musi Rawas District	4	Non-Certified	S 02°55'48.82" E 103°11'07.53"	SHM
5	Nanin	Karya Sakti Village, Muara Lakitan Sub District, Musi Rawas District	10	Non-Certified	S 02°55'48.82" E 103°11'07.53"	SHM
6	Poniran	SP 3 Trans Subur	100	Non-Certified	S 02°47'29.27" E 103°09'45.01"	SHM
7	Hendrik	SP 1 Trans Subur	300	Non-Certified	S 02°48'40.87" E 103°06'57.42"	SHM

The company can also show proof of legal documents owned by the sample farmers above in the form of certificates of land rights they have, as well as information on the location of their land which is not in the disputed area or state land and forest area under protection status.

The company has identified the sources of those suppliers covering information of contact person, location, coordinates, land ownership status (SHM, SKT). The company has ensure that the FFB were from legal sources.

Status: Comply

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

3.1

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

3.1.1

The company has a long-term plan that is contained in the 5-Year Economic Feasibility document of PT Djuanda sawit Lestari from 2022 to 2026 which was approved by CFO PSM 2 on June 2, 2022. The document contains information on plantation business including maintenance costs, fertilizer costs, harvest costs, transportation costs, FFB production, OER, KER, CPO production, kernel production, production prices, CPO prices, company profits, Plasma Smallholder Purchases, etc.

Annual plans are also evaluated at the end of the year and compared with their realization. The annual plan can be adjusted based on field conditions, financial conditions or other reasons. The plantation and mill management unit states that the long-term plans mentioned above can be amended and reviewed annually by the respective management such as the Mill or Plantation Manager (MM or EM) and the Vice President of Agronomy or Mills (VPA/VPM) taking into account the actual trends and dynamic situations that are predicted to change in the future. Furthermore, the management unit stated that there is no peat in the plantation operational area. The Sustainability Department together with Estate and Mill Management are responsible for ensuring that all technical implementation is in accordance with procedures, which aim to achieve optimal output for the purpose of meeting the budget through monitoring, training and socialization.

3.1.2

The company already has a replanting plan which is contained in the 5-Year Economic Feasibility Analysis document of PT Djuandasawit Lestari from 2022 to 2026 which was approved by the CFO of PSM 2 on June 2, 2022. In the document it is explained that the replanting plan that will be carried out by the company will be carried out in 2024 covering an area of 724 ha, in 2025 it is covering an area of 2,016 ha, and in 2026 it is an area of 959 ha. The plan has been prepared based on the results of an annual evaluation carried out by taking into account the results of FFB production from the oldest plants.

3.1.3

The Certification Unit has procedures related to operational internal audits in SOP No. SOP/SMART/GENERAL/SADV//009. The SOP, which has been approved by the Sustainability Division Head and Head of Upstream, came into effect on July 1, 2014. To ensure consistency in the application of procedures, the company routinely conducts internal audits, both agronomy and processing. Organized by the Operational Internal Audit (OIA) Department every semester. The internal audit records for 2021 have been documented. Internal audit non-compliance records have been corrected and verified by management. There is no SOP revision on the ASA 1.1 assessment. Each SOP contains a document control page that records revisions, if any.

Management review has been demonstrated through several documents, for example as follows:

- The OIA management review was carried out on January-September 2021. Things that were considered in the management review of the results of the operational audit, among others, were maximizing fruit production, maximizing fruit transportation time so that the fruit produced was fresher by shunting FFB to areas that can be passed by MTG in a safe manner. manually.
- MTWE management review in 2021 which was conducted on October 11, 2021. This activity was carried out to see the suitability of the implementation of operational activities in the field with ISPO, RSPO, ISCC and SMK3 certifications in 2021.
- The 2021 MKNE management review was carried out on October 16, 2021. This activity was carried out to see the suitability of the implementation of operational activities in the field with ISPO, RSPO, ISCC and SMK3 certifications in 2021.
- The 2021 MKNM management review was conducted on October 12, 2021. This activity was carried out to see the suitability of the implementation of operational activities in the field with ISPO, RSPO, ISCC, OIA and SMK3 certifications in 2021.

Each unit has documented plantation operations and factory production such as daily reports, supervisor's workbooks, etc. The field visit to the factory showed that the unit had documented daily activities in daily production reports which were documented using a computerized system.

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.
- Based on data on pesticide use in 2021 and 2022 and the results of field visits in chemical warehouses, it is known that there are no use of insecticides and rodenticides that are used as chemical pest control for animals.
- Based on data from the animal pest census in 2021 and 2022, it is known that there are no attacks of oil palm leaves eater and rats that exceed the threshold.
- 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 a track record of implementing continuous improvement. This is a note in the 2021 Innovation Recapitulation and Monitoring document which contains, among other things:

- Pick up harvest tools in the field
- FFB early delivery before 10:00
- Stop Block Implementation (Keep moisture and water inside the block)

Evidence of the implementation of continuous improvement for the OHS aspect is shown by the company in the implementation of the SMK3 audit referring to Government Regulation no. 50 of 2012. The last SMK3 audit was carried out in 2021, which was carried out by a certified Internal Auditor, on 30 August – 03 September 2021. The results of the review of the Report document, it is known that no discrepancies were found.

3.2.2

Company's can submit annual reports using the RSPO Metrics Template format which is submitted to the RSPO Secretariat via the CB. The company also has shown the auditor regarding the RSPO metric template that has been filled in according to the facts and data in the company's record documents, such as the number of workers, the area of production to the record of work accidents, the area of HCV, the amount of freshwater usage for FFB processing and etc. All data that informed in the RSPO Metrics Template was in sync accordance to the raw existing Data in the company's real record documents.

Based on the explanation above, it is known that certification unit already implemented monitoring and continuous improvement process, through annual reports that are submitted to the RSPO Secretariat using the RSPO Metrics Template.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The unit of certification has procedures related to oil palm agronomy, oil palm processing and safety aspects, which are summarized as follows:

- Technical SOP-IK for Oil Palm Cultivation from land preparation to harvesting compiled by the MCAR (Management Committee Agronomy and Research) team in 2020. The SOP documents include planning for planting new areas, replanting plans, nurseries, land clearing, planting, replanting, pest and disease control, weed control, fertilization, maintenance of immature plants, preparation for harvest, harvesting, loading and transportation of FFB. The SOPs are available at the audit site (Plantation and Factory offices) and are written in a language that is easy for workers to understand (written in Indonesian).
- The company also has a complete SOP related to processing palm oil into CPO and PK at the Palm Oil Mill. SOP/SMART/MCMD/I/TM-PKS 7th revision dated on 3 January 2022. The SOPs covering all plant operations such as FFB Grading, Sterilization Station, Press Station, Threshing Station, Oil Room, Kernel Factory, Laboratory, CPO & PK Delivery, Machine Room, Boiler Room, Electrical, Workshop as well as Raw and Water Treatment Plants Boilers. The SOPs are available at the audit site (Plantation and Factory offices) and are written in a language that is easy for workers to understand (written in Indonesian).
- All procedures both in the plantation and at the mill have been included with safe work instructions, in addition to those described in the HIRAC document.

Based on the review of the procedure documents, it can be concluded that the agronomic, processing and safety procedures of oil palm are still relevant to the current situation and cover all major aspects from the field to the mill. All procedures are available in Indonesian. Likewise with the results of interviews with employees where the understanding of plantation and mill employees on technical and safety matters is considered very satisfactory.

3.3.2 & 3.3.3

The Certification Unit has procedures related to operational internal audits in SOP No. SOP/SMART/GENERAL/SADV/II/009. The SOP, which has been approved by the Sustainability Division Head and Head of Upstream, came into effect on July 1, 2014. To ensure consistency in the application of procedures, the company routinely conducts internal audits, both agronomy and processing. Organized by the Operational Internal Audit (OIA) Department every semester. The internal audit records for 2021 have been documented. Internal audit non-compliance records have been corrected and verified by management. There is no SOP revision on the ASA 1.1 assessment. Each SOP contains a document control page that records revisions, if any.

Management review has been demonstrated through several documents, for example as follows:

- The OIA management review was carried out on January-September 2021. Things that were considered in the management review of the results of the operational audit, among others, were maximizing fruit production, maximizing fruit transportation time so that the fruit produced was fresher by shunting FFB to areas that can be passed by MTG in a safe manner. manually.
- MTWE management review in 2021 which was conducted on October 11, 2021. This activity was carried out to see the suitability of the implementation of operational activities in the field with ISPO, RSPO, ISCC and SMK3 certifications in 2021.
- The 2021 MKNE management review was carried out on October 16, 2021. This activity was carried out to see the suitability of the implementation of operational activities in the field with ISPO, RSPO, ISCC and SMK3 certifications in 2021.
- The 2021 MKNM management review was conducted on October 12, 2021. This activity was carried out to see the suitability of the implementation of operational activities in the field with ISPO, RSPO, ISCC, OIA and SMK3 certifications in 2021.

Each unit has documented plantation operations and factory production such as daily reports, supervisor's workbooks, etc. The field

visit to the factory showed that the unit had documented daily activities in daily production reports which were documented using a computerized system. Based on the procedure, the certificate holder is known to routinely conduct an internal audit every 6 months. The internal audit is carried out by the SMART Internal Auditor to conduct inspections related to the operations of the management unit (plantations and factories). The certificate holder shows the results of the 2021 internal audit. The implementation of the internal audit includes several criteria such as: cash bank administration, inventory, plant maintenance, plant production, plant production, wages and personnel.

The company monitors contractor performance related to compliance with procedures through internal audits carried out. The company can show the results of the internal audit in 2021. From the results of the internal audit, it is known that the contractor has complied with the company's procedures.

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

EIA

The company already has an environmental impact analysis document in the form of an AMDAL consisting of ANDAL and RKL-RPL for PT Djuandasawit Lestari's oil palm plantations and mills in Muara Kelingi and Muara Lakitan sub-district, Musi Rawas District, South Sumatra compiled by PT Djuandasawit Lestari with a scope of the study area is 14000 ha and the POM capacity is 60 tons FFB/hour. This AMDAL document has received approval from the minister of agriculture with decision number 29/ANDAL/RKL-RPL/BA/VIII/1998 which was approved on 4 August 2013.

Based on the direction of the environmental document (AMDAL), the impact components that will be monitored and managed are:

- Erosion
- Decreased water quality
- Vegetation change
- Presence of wildlife and plant pests
- Community social (employment and business opportunities, community income, community complaints and concerns)

The company conducts a re-environmental feasibility assessment aimed at assessing and updating new impacts and determining new management and monitoring plans. So that as of December 28, 2018, the company has a new environmental document, namely the DELH document which covers an area of 14,662.77 Ha (there is an addition of 380.08 Ha from the previous document) as well as a study of the New Impact caused by Land Application activities.

DELH document on behalf of PT Djuandasawit Lestari with No: 503/09/III/DPM-PTSP/2018 based on the Decree of the Head of the Musi Rawas District Investment and One Stop Service Office regarding Environmental Feasibility Environmental Evaluation Document (DELH) for plantation and mill activities processing palm oil on behalf of PT Djuandasawit Lestari with an area of 14,662.77 hectares with a capacity of 60 Tons FFB/hour in Muara Kelingi, Muara Lakitan and Megang Sakti Sub Districts, Musi Rawas District which was set on 28 December 2018.

Based on the directives of the environmental document (DELH), the components of the impacts that are managed and monitored are:

Impact Type		Monitoring Location		Monitoring Frequency
Decrease in river water quality		Lakitan River (Upstream & Downstream)		Every 6 Months
		Parit Temani (Downstream & Upstream)		
		Bakul River (Upstream & Downstream)		
		Aur . River		
		Storage Pool Water		
Decreasing Groundwater Quality		Monitoring Well (1,2,3)		Every 6 Months
		Residential Well		

Decrease in Groundwater Quantity	Factory housing hut Pondok Housing Division 1,2,3 & 4 Muara Kandis Estate	Every 1 year (Annually)
Decrease of Air Quality	In front of MKNM employees' houses In front of the MKNM Factory Office Boiler Tests 1 & 2 1.2 & 3 . Genset Test WWTP smell	Every 6 Months Every 1 year (Annually)
Increasing of Noise Pollution	Front of MKNM Employee Housing Front of Factory Office Sterilizer Station Press Station Kernel Station Boiler Station Engine Room Factory workshop Factory Office Clarification Station	Every 6 Months
Increasing soil erosion and quality	Erosion Monitoring Block K-25 Division 3 MKNE Block L32 Division 2 MKNE Monitoring soil quality in the Land Application area	Every 3 Months Every 1 year (Annually)
Disruption of terrestrial flora	PT DSL Estates	Every 6 Months
Disruption of Land Fauna	PT DSL Estates	Every 6 Months
Decrease in Aquatic Biota	Lakitan River (Upstream & Downstream) Parit Temani (Downstream & Upstream) Bakul River (Upstream & Downstream) Aur . River Storage Pool Water	Every 6 Months
Increased Salary	Surrounding Residential Area PT DSL	Every Once a Year
Changes in Public Perception	Surrounding Residential Area PT DSL	Every Once a Year
Public Health Disorder	Surrounding Residential Area PT DSL	Every Once a Year
Fire Potential	PT DSL management area and around the company	Every once a month

The Company already has an Environmental Permit for Plantation and Palm Oil Processing Mill activities on behalf of PT Djuandasawit Lestari with an area of 14,662.77 Ha with a capacity of 60 Tons FFB/Hour in Muara Kelingi, Muara Lakitan and Megang Sakti Sub Districts, Musi Rawas District One Stop Investment and Service Number: 10/KPTS/III/DPM-PTSP/2018 which was stipulated on December 31, 2018.

In the 1998 environmental document currently owned by the company, it is explained that on pages II-24 the economic and cultural analysis data collection uses primary data using the Rapid rural appraisal method for 30 residents who are estimated to represent the areas directly or indirectly affected. The local residents who were sampled in the environmental impact assessment were residents of Muara Megang Village, Petransjaya Village, Karya Sakti Village, Karya Mukti Village.

The company has carried out a management and monitoring plan in accordance with the matrix in the environmental document and reported it to the government every 6 months.

SIA

The company has also conducted a Social Impact Assessment of the Palm Oil Plantation and Mill PT. Djuandasawit Lestari Musi Rawas District, SUMSEL Province, conducted by the TEAM Social Impact and Grievance Section (SIGS) PT. SMART, Tbk. 2014. SIA Assessors: Veranita Mei Pratiwi (Social and Anthropology) and Yosaphat Ardhilla Renato (RSPO Approved HCV Assessor Discipline Specialist Social: Pra, Socioeconomic or cultural studies, participatory mapping, conflict resolution).

Methodology: Qualitative approach. Primary and secondary data collection. Coverage of study area: Muara Lakitan Sub district (Lubuk Pandan Village); Megang Sakti Sub district (Muara Megang Village); Muara Kelingi Sub District (Lubuk Tua Village, Karya Sakti, Petrans Jaya, Karya Mukti, Belita Jaya)

Primary data: observation method, depth interview and FGD with affected parties. Total number of respondents: 88 people consisting of village/sub-district officials, community leaders, management of oil palm cooperatives, farmers, labor unions, employees and residents of employee cottages.

Secondary data: indirectly in the form of published evidence, records, archives or historical reports. References: AMDAL, HCV Documents, local government literature, CSR implementation notes.

Points d) – j): Assessment aspects include:

- Economic Life (Natural Potential, Livelihoods, Local Economy, Food Security, Vulnerable Groups, Company Contributions, Plasma Plantation Development).
- Social and Cultural Life (Education, Health, Religious System, Customs).

The Certification Unit carries out the implementation of the SIA program which is held in conjunction with the CSR program. The program and their CSR and SIA are carried out simultaneously, combining the process of compiling and reviewing the success of the implementation level together with the community and the local village government in preparing plans for social monitoring and welfare development of local communities around the company's area.

The company annually conducts a joint review with the community and local village government in preparing a social management and monitoring plan. The company shows the PT DSL Social Impact Management Monitoring plan report for 2021-2022. The report is prepared based on the results of the management and monitoring review conducted by the company in December 2021. The types of data collected are primary and secondary data. Primary data is a source of data obtained directly from the source either individually or in groups. Primary data collection for monitoring social impact management was obtained from informants as affected parties and local village officials who represented the community and as verifiers.

Meanwhile, secondary data is obtained indirectly through intermediary media in the form of evidence, records, archives, or published historical reports. Secondary data collection through literature or literature study. Secondary data is obtained from related units in the framework of impact management documentation as well as additional data from relevant affected parties. The reading materials used are documentation of the implementation of impact management, company internal data, correspondence between companies and affected parties, and so on. Secondary data is also obtained from parties that are not directly related, such as sub-district data and news or pages from the media.

3.4.2

Based on the results of document verification, it can be concluded that all management and monitoring Parameters requested in environmental documents have been implemented, for example the implementation of environmental management for important impacts of air quality by installing dust collectors, increasing the height of the Mill chimney and revegetation around the Mill. The company has also carried out an evaluation for each significant impact monitoring Parameter that is implemented as required in KepmenLH 45 of 2005, which includes an evaluation of trends, evaluation of critical levels and evaluation of compliance. Based on the results of the evaluation, it is known that all Parameters are still in accordance with the Quality Standards, and there is no indication of contamination. The process of improvement / management of the slope and erosion level has been improved a lot, and continues to be improved to follow the direction of the existing study results.

Meanwhile, the plan of social monitoring and management included Social Impact Assessment implementation report period 2021 - 2022. The impact identified in SIA has been managed and monitored through SIA Management and Monitoring Plan. The plan describes monitoring indicator, monitoring method, PIC and frequency. In addition to these programs, the company also provides budget / cost estimates for the implementation of each of these programs. These programs are arranged according to the identification of the needs of the surrounding community. Identification of the needs of the surrounding community is carried out by following the Village Level Deliberation.

In general, the management of social impacts in the PT DSL unit has been carried out with the aim of reducing the impacts that have been identified. In accordance with the review of the management plan and monitoring of social impacts for the 2016-2019 period, monitoring is carried out for both positive and negative impacts that are identified and analyzed. For the negative external impact of the company related to the condition of road maintenance which is considered less than optimal, from the results of the Monitoring of Social Impact Management in 2021, the company has carried out road maintenance and is appreciated by the community. Ease of accessing heavy equipment and responsiveness to road maintenance requests are considered positive progress. In the next period, road maintenance in Lubuk Tua Village will be the company's concern in managing the impact, namely in the form of assistance from companies in the infrastructure sector so that company support for this can continue.

A significant positive impact is felt, namely the facilities for PT DSL employees that have been fulfilled, as well as the wages paid on time. At PT DSL there is a Labor Union that functions as a bridge between employees and the company so that if there are complaints, they can be followed up immediately. In the next period, this impact can be maintained and enhanced through good communication facilities between the company and employees.

3.4.3

EIA

The company has documents related to the implementation of the results of the Environmental Permit including reports to the competent authorities in the form of RKL-RPL documents which are carried out every semester. The company can show evidence of reporting in the form of a document affixed with a wet stamp, the name, and signature of the recipient which is sent to the relevant agencies such as the Environmental Agency of Musi Rawas District, DPMPTSP of Musi Rawas District, Plantation Office of Musi Rawas District and the Land and Environment Agency of Sumatera Selatan Province. Reports are also made to the Ministry of Environment and Forestry as evidenced by an Electronic Receipt (TTE).

- Receipt for reporting RKL/RPL documents for semester 1 of 2021, through SIMPEL with ID TTE Number 1625102726-2005 which was reported to KLHK on July 1, 2021 and has been known by the Environmental Service of Musi Rawas District, Sumatera Selatan Province.
- Receipt for reporting the RKL/RPL document for semester 2 of 2021, through SIMPEL with ID TTE Number 1642216106-2005 which was reported to KLHK on January 15, 2022 and has been known by the Environmental Service of Musi Rawas District, Sumatera Selatan Province.
- Receipt of LB3 Management report for Quarter III 2021 dated October 25, via SIMPEL with TTE ID Number: 1635925436-522 which is reported to the South Sumatra Provincial Environmental Service.
- Receipt of the LB3 Management report for Quarter IV 2021 dated January 31, 2022, via SIMPEL with ID TTE Number: 1644637376-20005 which is reported to the Sumatera Selatan Provincial Environmental Service.
- Receipt of the first Quarter 2022 LB3 Management report dated April 9, 2022, through SIMPEL with TTE ID Number: 1648780383-2005
- Receipt of the Pollution Control Report Quarter III of 2021 on October 10, 2021, through SIMPEL with TTE ID Number : 165411522-2005
- Receipt of the Pollution Control Report Quarter IV 2021 on January 31, via SIMPEL with ID Number TTE:165411473-2005
- Receipt of the first Quarter 2022 Pollution Control report on April 9, 2022, via SIMPEL with TTE ID Number: 1648780325-2005
- Receipt for reporting the report on the Implementation of Management and Monitoring of PT Djuandasawit Lestari's High Conservation Value Areas in 2021 which was reported to the Environmental Service of Musi Rawas District, Sumatera Selatan Province on 17 June 2022.

The implementation of environmental management and monitoring is carried out in accordance with the directives of the results of the RKL and RPL in the 2018 DELH study. The effectiveness of environmental management and monitoring can be seen from the results of the analysis of environmental management and monitoring, where it can also be seen the compatibility between the management and monitoring plans and their implementation in the field. Based on the DELH document PT Djuandasawit Lestari is known that there are 12 (twelve) significant impacts that must be managed, including:

- Decrease in River Water Quality
- Decreasing Groundwater Quality
- Decrease in Groundwater Quantity
- Decreasing Air Quality
- Noise Enhancement
- Improved Erosion and Soil Quality • Disruption of Land Flora and Fauna

- Decline in Aquatic Biota
- Increased revenue
- Changes in Public Perception
- Public Health Disorders and
- Potential for Land Fires

The implementation of environmental management and monitoring is carried out in accordance with the directives of the results of the RKL and RPL in the 2018 DELH study. The effectiveness of environmental management and monitoring can be seen from the results of the analysis of environmental management and monitoring, which can also be seen in the suitability of the management and monitoring plans with their implementation in the field. Based on the DELH document PT Djuandasawit Lestari is known to have 12 (twelve) significant impacts that must be managed, including:

Decrease in River Water Quality

- Decreasing Groundwater Quality
- Decrease in Groundwater Quantity
- Decreasing Air Quality
- Noise Enhancement
- Improvement of Soil Erosion and Quality • Disturbance of Land Flora and Fauna
- Decline in Aquatic Biota
- Increased revenue
- Changes in Public Perception
- Public Health Disorders and
- Potential for Land Fires

Based on the results of field observations, it can be seen that the company has carried out environmental management in accordance with the RKL-RPL by installing warnings for conservation areas and prohibiting hunting and protected animals. In addition, there are markings in the form of stakes and red paint for spray boundary areas and other chemical applications.

SIA

The company has also conducted a Social Impact Assessment of the Palm Oil Plantation and Mill PT. Djuandasawit Lestari Musi Rawas District, SUMSEL Province, conducted by the TEAM Social Impact and Grievance Section (SIGS) PT. SMART, Tbk. 2014. SIA Assessors: Veranita Mei Pratiwi (Social and Anthropology) and Yosaphat Ardhilla Renato (RSPO Approved HCV Assessor Discipline Specialist Social: Pra, Socioeconomic or cultural studies, participatory mapping, conflict resolution).

Methodology: Qualitative approach. Primary and secondary data collection. Coverage of study area: Muara Lakitan Sub district (Lubuk Pandan Village); Megang Sakti Sub district (Muara Megang Village); Muara Kelingi Sub District (Lubuk Tua Village, Karya Sakti, Petrans Jaya, Karya Mukti, Belita Jaya)

Primary data: observation method, depth interview and FGD with affected parties. Total number of respondents: 88 people consisting of village/sub-district officials, community leaders, management of oil palm cooperatives, farmers, labor unions, employees and residents of employee cottages.

Secondary data: indirectly in the form of published evidence, records, archives or historical reports. References: AMDAL, HCV Documents, local government literature, CSR implementation notes.

Points d) – j): Assessment aspects include:

- Economic Life (Natural Potential, Livelihoods, Local Economy, Food Security, Vulnerable Groups, Company Contributions, Plasma Plantation Development).
- Social and Cultural Life (Education, Health, Religious System, Customs).

The Certification Unit carries out the implementation of the SIA program which is held in conjunction with the CSR program. The program and their CSR and SIA are carried out simultaneously, combining the process of compiling and reviewing the success of the implementation level together with the community and the local village government in preparing plans for social monitoring and welfare development of local communities around the company's area.

- The company annually conducts a joint review with the community and local village government in preparing a social management and monitoring plan. The company shows the PT DSL Social Impact Management Monitoring plan report for 2021-

2022. The report is prepared based on the results of the management and monitoring review conducted by the company in December 2021. The types of data collected are primary and secondary data. Primary data is a source of data obtained directly from the source either individually or in groups. Primary data collection for monitoring social impact management was obtained from informants as affected parties and local village officials who represented the community and as verifiers.

Meanwhile, secondary data is obtained indirectly through intermediary media in the form of evidence, records, archives, or published historical reports. Secondary data collection through literature or literature study. Secondary data is obtained from related units in the framework of impact management documentation as well as additional data from relevant affected parties. The reading materials used are documentation of the implementation of impact management, company internal data, correspondence between companies and affected parties, and so on. Secondary data is also obtained from parties that are not directly related, such as sub-district data and news or pages from the media.

Based on the results of field visits and interviews with employees, village officials, and related agencies, there were no significant issues that arose for the 2019-2021 period. Issues that previously arose in the 2018-2019 period, namely related to odors and flies due to the application of empty jars and dust from trucks, have been verified by the affected parties and the Environmental Service and it can be concluded that until now there have been no more complaints related to these issues. This shows that the company has been responsive in responding to emerging social issues and can manage them well. Apart from these issues, there are no other issues raised by the community around the company.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1

The CH has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally stated in the Collective Labor Agreement (CLA) written in Indonesian. In general, this procedure describes:

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

In addition to being publicly listed in the CLA, The CH also has other procedures in the form of Policies, SOPs, Internal Memorandums and others related to recruitment, promotion, retirement, termination of employment and others that have not changed since the previous audit. This procedure has been documented to all workers and their representatives. For example, several procedures that the company has, including Procedure No. SDM D-010-00 on Promotion, CLA article 5 on recruitment.

Based on this, it is concluded that The CH has procedures for recruitment, selection, employment, promotion, retirement and termination of employment that have been documented/available to workers and their representatives in accordance with applicable regulations.

3.5.2

The CH has properly implemented employment procedures & has managed the records. In the previous audit, it has been examined regarding the management of records and the implementation of labor recruitment, as well as the harvester retirement process. On this audit occasion, an examination related to employee assessment and the process of termination of employment was carried out.

For example, the Work Performance Assessment Form for the Muara Kandis POM Sterilizer Operator for the 2021 period has been shown. The criteria assessed include aspects of discipline, work quantity, work quality, cooperation, work attitude, and responsibility. The assessment is carried out by the Assistant to the Manager.

The CH also shows an example of a process employee termination document with the initials B in Muara Kandis POM. A Collective Agreement has been shown between the worker and the company related to the layoff, at the age of 55, which was signed jointly by the parties and witnessed by representatives of the Labor Union. The document is accompanied by a calculation of severance pay

and award pay based on labor regulations, as well as proof of transfer and receipt of payment to workers.

Status: Comply

3.6

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

3.6.1

The CH already has an occupational safety and health policy written in Indonesian. This policy was passed on November 1, 2013. This policy is designed to control hazards in every activity in the work environment to prevent accidents and occupational diseases. Management has an occupational health and safety work program every year. The realization of the work program will be monitored through regular P2K3 meetings every month. This work program applies generally to all workers in the workplace. If the plan is not on target, it will be evaluated in regular meetings to assess effectiveness.

The unit of certification has a hazard identification, risk assessment and risk control (HIRAC) document which is issued annually and will be evaluated at the end of each year. In 2022, HIRAC MKNE was ratified on January 10, 2022, HIRAC MTWE was ratified on December 31, 2021, and HIRAC MKNM was ratified on January 5, 2022. The results of the document review revealed that the HIRAC MKNE and MTWE have identified all operational activities in the plantation, such as activities at the day care center, children, warehousing, infrastructure, offices, HCV monitoring, emergency response preparedness, clinics, work environment, pandemics, harvesting, nurseries, maintenance, workshops, etc. For HIRAC MKNM, it has identified all processing activities, such as weighbridge, grading, loading ramp, Sterilization, Threshing, Digesting and Press, Clarification, Nut and Kernel, Boiler, Power House and engine room, WTP, WWTP, workshop, laboratory, and Dispatch.

3.6.2

The CH has monitored the effectiveness of the OHS plan in dealing with health & safety risks, this is shown including:

- Based on field observation, interviews with workers, and document review its known that provision of PPE for free to all workers and arrange the use of PPE according to the type of work based on the free predetermined HIRAC
- Based on document review, its known that the CH have permits for all factory operating machines that have been tested for eligibility according to applicable regulations.
- Based on interviews with workers and document review, it's known that already have a license / competency for some special jobs that require more expertise such as OHS experts, hyperkes, boiler operators, diesel engine operators, welder, wheel loader operators and others in accordance with the requirements contained in the legislation.
- Based on interviews and document review, it is known that the OHS Committee has conducted regular monitoring and discussions regarding the implementation of OHS aspects in all plantation and POM operational activities. For example, the OHS Committee meeting in February 2022 was held on February 4, 2022 with discussions including the OHS month warning and the evaluation of the previous month's OHS program.

Status: Comply

3.7

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

3.7.1, 3.7.2

The CH has maintained a documented record of training programs for all staff, workers, smallholders and outgrowers taking into account gender-specific needs and covering aspects of the RSPO principles and criteria. The CH has a training program organized annually based on the identification of employee training needs as indicated in the Personal Competency Identification Matrix. The document identifies the type of competence for the level of workers to Manager. Then it is revealed in the form of an annual training program. For example, the implementation of the company's policy socialization program to maintenance workers, harvesters, pickers, and foremen in all divisions in MTWE during morning apples on April 20, 21, 25, and 26, related to the treatment of pregnant and lactating women, HCV, gender committee, harassment sexual, and Health procedures during Covid.

For plasma farmers, examples of documents for trainings for the workers and administrators of KUD Sadar Sejahtera were shown, which were attended by male and female participants. For example, first aid training was held on 13 April 2022, LSU and SSU training on 28 January 2020, then socialization of KSLG (GAR Environment and Social Policy), HCV, waste management, and driving safety on 15 November 2021, as well as IPM, fertilization, and census training on 19 November 2021.

The CH has also maintained a personal training record. For example, the MKNE Mechanic training record with the initials W and the census officer with the initials DG, which contains relevant internal and external training information, training certificates (if any). The results of interviews with workers in both estate and POM also revealed that workers have received relevant training and can practice

technical work well.

3.7.3

The unit of certification showed socialization about the supply chain to employees which was last conduct on 30 May 2022. The minutes explained the procedures for managing certified and non-certified products including the responsibilities for each of the personnel who handle products.

The results of interviews with Head of Administration, weighbridge operator in POM and FFB administration in Estate showed that workers have already known the duties and responsibilities of each in the implementation of SCCS in accordance with the procedure and 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 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 (MT)	Actual (June 2021 - May 2022) MT
FFB Certified (MT)	150,000	96,493.28
CSPO (MT)	33,000	20,451.97
CSPK (MT)	8,700	5,886.67

3.8.4

The Mill has registered as RSPO member under GAR (No. 1-0096-11-000-00) 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 Djuandasawit Lestari - Muara Kandis Mill
- License ID: CB122512
- Core Product: Palm Oil
- Member ID: RSPO_PO1000001631
- Type of Business: Oil Mill
- Supply chain model: Mass Balance

3.8.5

The Mill has had procedures related supply chain, such as SOP of RSPO Supply Chain Model of Mass Balance (No. PT.DSL.MKNM/SOP/24 dated 27 May 2020), SOP of FFB Processing (No. SOP/SMART/MCMD/I/TM-PKS), SOP of Reporting of Certified Product (No. SOP-SMART/CERS-EHSD/SADV/003), and SOP of Document and Record Controlling (No. SOP/SMART/UMUM/SADV/I/001).

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 Muara Kandis POM 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 the procedure of RSPO Supply Chain Model of Mass Balance (No. PT.DSL.MKNM/SOP/24). 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 30 August – 3 September 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 16 October 2021. The management review discussion has covered the input from internal audit result, correction and corrective action, process perform 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 33 months before audit which is June 2021 – May 2022:

Month	FFB (ton)		Total
	Certified	Non-Certified	
June 2021	11,253.07	14,712.26	25,965.33
July 2021	10,901.77	12,888.90	23,790.67
August 2021	11,128.55	14,630.03	25,758.58
Sept 2021	11,364.00	12,632.03	23,996.03
Oct 2021	10,349.65	11,691.96	22,041.61
Nov 2021	9,912.40	12,929.60	22,842.00
Dec 2021	6,819.78	16,622.67	23,442.45
Jan 2022	5,548.02	16,612.23	22,160.25
Feb 2022	3,526.56	10,083.06	13,609.62
Mar 2022	4,477.49	13,195.50	17,672.99
Apr 2022	5,138.61	17,050.66	22,189.27
May 2022	6,443.40	12,324.40	18,767.80
Total	96,863.30	165,373.30	262,236.60

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	Actual
	Certified Volume (MT)	(June 2021 - May 2022) MT
FFB Certified (MT)	150,000	96,493.28
CSPO (MT)	33,000	20,451.97
CSPK (MT)	8,700	5,886.67

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

Related for handling non-conforming oil palm products, has been set in the SOP for Handling Complaints and Dissatisfaction with the Sustainability and Strategic Stakeholder Engagement Directorate 2017, document number SOP / SMART / GIMS-SCMD / USDV / 1/001, Rev.2.0. This procedure is generally applied to all complaints aspects, including complaints and non-conforming products from customers/buyers. During the audit, there is no written complaint from stakeholders related to nonconforming products.

3.8.8

The mill has product information provided in such as document of weighbridge ticket, delivery order and other invoices, as example at invoices of PK certified delivery on 17 May 2022. The informations provided on invoices are:

- The name and address of the buyer (PT Sumber Indah Perkasa - Jakarta);
- The name and address of the seller (PT Djuandasawit Lestari – Muara Kandis Mill in Musi Rawas District)
- The loading or shipment / delivery date (17 May 2022);
- A description of the product supply chain model (Mass Balance)
- The date on which the documents were issued (17 May 2022);
- The quantity of the products delivered (19.56 ton);
- Any related transport documentation (transport by CV Cipta Maju Mandiri);
- A unique identification number (B211MKNMP02867);
- RSPO certificate number (Mutu-RSPO/059);
- etc.

3.8.9, 3.8.10 and 3.8.11

The company has no outsourced contractors for the processing or physical handling of RSPO certified oil palm products. All processing from FFB to CPO/PK are done by Muara Kandis Mill and all PK/CPO transporter are under contract with buyer.

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 12-months before audit (June 2021 – May 2022):

Month	CPO (ton)		Total
	Certified	Non-Certified	
June 2021	2,415.33	3,153.62	5,568.95
July 2021	2,310.30	2,739.04	5,049.34
August 2021	2,283.35	3,022.38	5,305.73
Sept 2021	2,412.39	2,705.37	5,117.76
Okt 2021	2,198.20	2,484.44	4,682.64
Nov 2021	2,119.85	2,751.88	4,871.72
Des 2021	1,670.64	3,254.77	4,925.41
Jan 2022	1,062.77	3,221.26	4,284.03
Feb 2022	721.41	2,070.30	2,791.72
March 2022	904.43	2,662.86	3,567.29
Apr 2022	1,025.75	3,355.19	4,380.94
May 2022	1,327.55	2,606.42	3,933.97
Total	20,451.97	34,027.51	54,479.48

Month	CSPO Despatch (ton)			Total
	RSPO	ISCC	Non-Certified	
June 2021	-	2,548.52	-	2,548.52
July 2021	-	1,822.69	-	1,822.69
August 2021	-	2,625.28	-	2,625.28
Sept 2021	-	2,081.12	-	2,081.12
Okt 2021	-	2,718.38	-	2,718.38
Nov 2021	-	1,823.26	-	1,823.26
Des 2021	-	1,897.15	-	1,897.15
Jan 2022	-	977.96	-	977.96
Feb 2022	-	802.21	-	802.21
March 2022	-	864.58	-	864.58
Apr 2022	-	628.21	-	628.21
May 2022	-	876.80	-	876.80
Total	-	19,666.16	-	19,666.16

Month	PK (ton)		Total
	Certified	Non-Certified	
June 2021	726.63	926.81	1,653.44
July 2021	667.51	780.09	1,447.60
August 2021	663.25	869.08	1,532.33
Sept 2021	685.20	759.89	1,445.08
Okt 2021	603.09	667.64	1,270.74

Month	CSPK Despatch (ton)			Total
	RSPO	Other Scheme	Non-Certified	
June 2021	793.25	-	-	793.25
July 2021	706.71	-	-	706.71
August 2021	623.59	-	-	623.59
Sept 2021	552.63	-	-	552.63
Okt 2021	619.56	-	-	619.56

Nov 2021	593.96	775.80	1,369.76	Nov 2021	935.60	-	-	935.60
Des 2021	499.30	875.95	1,375.25	Des 2021	306.64	-	-	306.64
Jan 2022	320.42	997.07	1,317.48	Jan 2022	206.21	-	-	206.21
Feb 2022	202.04	569.77	771.81	Feb 2022	329.21	-	-	329.21
March 2022	264.47	784.12	1,048.59	March 2022	324.48	-	-	324.48
Apr 2022	295.67	935.20	1,230.87	Apr 2022	78.67	-	-	78.67
May 2022	365.13	686.50	1,051.63	May 2022	345.90	-	-	345.90
Total	5,886.67	9,627.92	15,514.58	Total	5,822.45	-	-	5,822.45

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 12-month period for June 2021 until May 2022 i.e OER 20.79% and KER 5.92%. Periodically update of extraction is actual extraction.

3.8.15

SCSS module used in Muara Kandis POM 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 Muara Kandis Palm Oil Mill is RSPO_PO1000001631. 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 Sumber Indah Perkasa dated 25 November 2021 for 505.12 ton and transaction creates in IT Palm Trace dated 25 November 2021.
- Certified PK sold to PT Sumber Indah Perkasa dated 16 November 2022 for 491.87 ton and transaction creates in IT Palm Trace dated 17 November 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 been removed the stock of CSPO from the palm trace, as example remove stock of CSPO dated 8 June 2022 for 876.80 ton (transaction ID: ST-TR-dc0afed7-93d8).

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

The CH already has a policy to respect human rights contained in GAR's Business and Human Rights Policy, which was endorsed in June 2021 by the Head of PCDV. The CH's commitment to the human rights aspect is embodied in the KLSG, code of ethics, and IR policy. The CH commitment is based on the UN universal declaration of human rights, UN Global Impact, the UN guiding principles on business and human rights, and government regulations. These commitments include fair treatment without discrimination to all workers, respecting freedom of opinion and joining/forming labor unions, preventing forced labor practices and not using workers resulting from human trafficking, not employing children, ensuring a safe work environment, recognizing women's equal rights and participation, environmental protection, respecting the rights of local and indigenous peoples, respecting and protecting the rights of whistleblowers and human rights defenders, preventing bribery and corruption practices, and resolving and recovering negative impacts in the event of human rights violations.

This has been socialized to all employees, co-workers, and the community. Regarding work partners, this has been stated in the

contractor's statement letter as discussed in indicator 2.2.3. An example of socialization to the community is shown in the document Form for Community Outreach Events around MKNE on October 6, 2021 to Semeteh, Lubuk Pandan, and Lakitan villages.

4.1.2

The CH has a policy of avoiding violence instigated to maintain peace and order in its current and planned operations which is described in the GAR Social and Environmental Policy, issued on 8 September 2015. Section 2.1.2 states "Reject the use of force in disputes with any party".

Based on interviews with the surrounding community, it is known that there was no intimidation or use of them in maintaining peace and order in the company area. Until the audit is carried out, there are no conflicts and land disputes within the PT DSL area. This is also consistent with the results of interviews with the surrounding community and the relevant BPN during a public consultation which stated that there were no land conflicts in the company's operational areas.

Status: Comply

4.2

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

4.2.1, 4.2.2, 4.2.3, 4.2.4

The CH shows the communication and consultation procedures indicated by the SOP/SMART/GIMS-SCMD/USDV/II/001 on Complaints and Grievances. The deadline for responding to requests for complaints and complaints is 3 weeks. If complaints and complaints are submitted verbally (the reporter cannot read and write) or by telephone, the recipient of the report (including assistants or other staff) must assist in writing/recording the reporting of complaints and verbal complaints. Report writing must protect the identity of the reporter and human rights defender. If no agreement is reached, either party may refer the case to the lawsuits section or the RSPO complaints panel. Based on interviews with stakeholders (Heads of Lubuk Pandan and Karya Mukti Villages, Government Agencies, Gender Committee, and Trade Unions) it is known that the procedure for submitting formal complaints has been socialized to them and they agree with the submission mechanism regarding the procedure. Based on interviews with these parties, Estate and Mill workers, it is also known that there have been no complaints during the last 1 year. Based on review of the Internal and External Recording and Dissatisfaction Form documents for semester 2 2021 until the audit was carried out, it is known that there were no complaints that came to the company. In accordance with the existing procedures, if there are internal complaints that have not been resolved from the parties, then bipartite negotiations are carried out. Regarding external complaints, if no agreement is reached, the formulation of the complaint response will be reviewed and look for alternative responses. Based on this, there is no risk of retaliation or intimidation, and follows the RSPO policy of respect for human rights defenders.

Status: Comply

4.3

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

4.3.1

The certification unit in carrying out the business process has a commitment to contribute to the fulfillment of social and environmental responsibilities in the community. The commitment to improve the quality of life and the environment that is beneficial to the local community or community has been stated in a PT DSL policy. This policy is contained in the GAR Social and Environmental Policy document (KSLG) which states that the GAR Group plays a role in community empowerment, and involves local farmers and entrepreneurs as suppliers. The policy is implemented by developing a CSR program, which is available for MKNM, MKNE, and MTWE.

The preparation of CSR programs is carried out in each unit as for MKNE and MKNM have their own programs, separate documentation, and separate target beneficiaries that are different and separate from MTWE's. The preparation of the CSR program has involved active community participation in the submission of program proposals, preparation, and evaluation of the implementation of CSR programs every year. The CSR programs run by MKNE and MKNM are prepared for each village around the Muara Kandis area such as Karya Sakti Village, Lubuk Pandan Village, Semeteh Village, Beliti Jaya Village. The CSR program run by MTWE was prepared for each village around the Muara Tawas area such as Lubuk Tua Village, Karya Mukti Village, Petrans Jaya Village, Pagar Ayu Village, and Muara Megang Village.

The company already has a welfare improvement program for the surrounding community in the form of a CSR program. The program has been listed in the 2021 and 2022 MTWE CSR Program Plan Documents, the 2021 and 2022 MKNE & MKNM CSR Program Plan Documents, and the Recapitulation of CSR Activities Realization Documents for MKNE, MKNM and MTWE in 2021. The

document explains that there are 5 categories of CSR programs that compiled by companies namely Education, Health, Infrastructure, Environment, and Social where the preparation of this program is based on the results of identification involving the surrounding village community.

The following is evidence of the involvement of village communities in the preparation of CSR programs for the period 2021 and program plans for 2022:

- Preparation of CSR Programs for MKNE & MKNM:
 - Signing of the 2021 CSR Work Plan (Programme) on April 9, 2021 by the Village Head of Lubuk Pandan
 - Signing of the 2021 CSR Work Plan (Programme) on April 9, 2021 by the Village Head of Semeteh
 - Signing of the 2022 CSR Work Plan (Programme) on 11 January 2022 by the Semeteh Village Head
 - Signing of the 2021 CSR Work Plan (Programme) on January 11, 2022 by the Village Head of Lubuk Pandan

- Preparation of CSR Programs for MKNE & MKNM:
 - Signing of the 2021 CSR Work Plan (Programme) on January 14, 2021 by the Head of Muara Megang Village
 - Signing of the 2021 CSR Work Plan (Programme) on January 14, 2021 by the Head of Lubuk Tua Village
 - Signing of the 2022 CSR Work Plan (Programme) on January 3, 2022 by the Head of Lubuk Tua Village
 - Signing of the 2021 CSR Work Plan (Programme) on January 3, 2022 by the Head of Muara Megang Village

The CSR programs carried out during 2021 as well as the CSR program plans for 2022 belonging to MKNE & MKNM are as follows:

- Preparation of CSR Programs for MKNE & MKNM:
- Health:
 - Posyandu activities for Lubuk Pandan Village in 2021,
 - SKM free of Cleft Lip, Hernia, Cataract for Semeteh Village in 2021,
 - Posyandu activities for Lubuk Pandan Village in 2022,
 - SKM free of Cleft Lip, Hernia, Cataract for Semeteh Village in 2022.
- Infrastructure:
 - Heavy equipment assistance for road repairs in Lubuk Pandan Village and Semeteh Village in 2021,
 - Heavy equipment assistance for road repairs in Lubuk Pandan Village and Semeteh Village in 2022
- Environment:
 - Making warnings and socializing fire prevention and hunting for protected animals for the Lubuk Pandan Village area in 2021
 - Making warnings and socializing fire prevention and hunting for protected animals for the Semeteh Village area in 2021
 - Making warnings and socializing fire prevention and hunting for protected animals for the Lubuk Pandan Village area in 2022
 - Making warnings and socializing fire prevention and hunting of protected animals for the Semeteh Village area in 2022
- Social:
 - Assistance for RI Anniversary activities for Lubuk Pandan Village in 2021
 - Assistance for religious activities for Lubuk Pandan Village in 2021
 - Mosque Assistance for Lubuk Pandan Village in 2021
 - Sports Activities Assistance for Lubuk Pandan Village in 2021
 - Repair of Lubuk Pandan Village Access Bridge in 2021
 - Assistance for RI Anniversary activities for Semeteh Village in 2021
 - Assistance for Religious activities for Semeteh Village in 2021
 - Support for sports activities for Semeteh Village in 2021
 - Help paint the prayer room for Semeteh Village in 2021
 - Assistance for Indonesian Independence Day Activities for Lubuk Pandan Village in 2022
 - Assistance for Indonesian Independence Day Activities for Semeteh Village in 2022
 - Sports Activities Assistance for Lubuk Pandan Village in 2022
 - Sports Activities Assistance for Semeteh Village in 2022
 - Assistance for Religious Activities for Lubuk Pandan Village in 2022
 - Assistance for Religious Activities for Semeteh Village in 2022

The CSR programs carried out during 2021 and MTWE's 2022 CSR program plans are as follows:

- **Education:**

- Teacher Salary Incentive for SDN Filial Pondok 1 Karya Mukti Village on 1 January 2021, 1 February 2021, 1 March 2021, 1 April 2021, 1 May 2021, 30 June 2021, 1 July 2021, 31 August 2021, 1 September 2021, 1 October 2021, November 1, 2021, and December 1, 2021.
- Anandan Pondok 1 Kindergarten Teacher Salary Incentives in Karya Mukti Village on 1 January 2021, 1 February 2021, 1 March 2021, 1 April 2021, 1 May 2021, 30 June 2021, 1 July 2021, 31 August 2021, 1 September 2021, 1 October 2021, November 1, 2021, and December 1, 2021.
- Fund Assistance for the Filial Pondok 1 SDN Gymnastics Competition in Karya Mukti Village on December 2, 2021

- **Health:**

- Karya Mukti Village Covid-19 Vaccination on October 15, 2021
- SKM free of Cleft Lip, Hernia, Cataract for Muara Megang Village and Lubuk Tua Village in 2021
- SKM free of Cleft Lip, Hernia, Cataract for Muara Megang Village and Lubuk Tua Village in 2022

- **Infrastructure:**

- 2 Km road repair in Muara Megang Village on April 5, 2021
- Repair of the Muara Megang Village Access Bridge on June 14, 2021
- Road repair using Road Grader and Vibro compactor for Pagar Ayu Village on August 14, 2021,
- Road repair using TLB heavy equipment for Petrans Jaya Village on August 19, 2021
- Repair of Pagar Ayu Village bridge on 12 September 2021
- Repair of the Karya Mukti Village bridge on October 27, 2021
- Repair of the old Lubuk Village culvert in 2021
- Road and bridge repair with Lubuk Tua Village heavy equipment on 14 & 15 August
- Material Assistance for the Refurbishment of the Lubuk Tua Village Mosque in 2022
- Repair of the access bridge to Muara Megang Village in 2022
- Improvement of Muara Megang Village Road in 2022

- **Environment:**

- Making warnings and socializing fire prevention and hunting for protected animals for Muara Megang Village in 2021
- Making warnings and socializing fire prevention and hunting for protected animals for Lubuk Pandan Village in 2021
- Making warnings and socializing fire prevention and hunting for protected animals for Muara Megang Village in 2022
- Making warnings and socializing fire prevention and hunting for protected animals for Lubuk Pandan Village in 2022

- **Social:**

- Assistance for Indonesian Independence Day Activities for Muara Megang Village in 2021
- Assistance for Religious Activities for Muara Megang Village in 2021
- Mosque Assistance for Muara Megang Village in 2021
- Sports Activities Assistance for Muara Megang Village in 2021
- Flood Victim Assistance (when flooded) for Muara Megang Village in 2021
- Assistance for Indonesian Anniversary Activities for Lubuk Tua Village in 2021
- Assistance for Religious Activities for Lubuk Tua Village in 2021
- Sports Activities Assistance for Lubuk Tua Village in 2021
- Mushola Paint Assistance for Lubuk Tua Village in 2021
- Assistance for Indonesian Independence Day Activities for Lubuk Tua Village in 2022
- Assistance for Religious Activities for Lubuk Tua Village in 2022
- Support for Sports Activities for Lubuk Tua Village in 2022
- Aid for Mushola Paint for Lubuk Tua Village in 2022
- Assistance for Indonesian Independence Day Activities for Muara Megang Village in 2022
- Assistance for Religious Activities for Muara Megang Village in 2022
- Mosque Assistance for Muara Megang Village in 2022
- Sports Activities Assistance for Muara Megang Village in 2022
- Flood Victim Assistance (when flooded) for Muara Megang Village in 2022

The program list has included the timeframe, budget, and documented evidence in the form of photos of the implementation of

activities and each PIC who is responsible for each of the planned programs. All of the above programs are measured qualitatively, both in terms of the positive impacts obtained and things that need to be improved in the future, as well as quantitatively measured through the realization of the use of costs for the implementation of these programs. The results of the measurement of the realization of the program are conveyed in the CSR program evaluation meeting which is carried out in conjunction with the evaluation of the SIA program or Social Impact Assessment.

Based on the results of interviews with the surrounding village communities, it is known that the company has routinely carried out identification/social studies in their villages routinely carried out by PT DSL (MKNE Estate Manager and MTWE Estate Manager) through musrembang or visiting village coconuts directly, where the results will be used as a reference for making CSR programs whose target is the welfare of the surrounding community.

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

PT Djuandasawit Lestari has managed area totaling for about 11,434.59 Ha, which consist of 10,958.40 Ha under HGU and 476.19 Ha HGU-on process that has been assessed on partial certification and has been put in time bound plan. However, scope of certification has stick on HGU area (10,958.40 Ha). The corporate area originates from state land with other usage area status, in which there are several community's land. The acquisition process began with obtaining a location permit from the governor of Sumatera Selatan in 1992. The next process is land acquisition from community's area by providing compensation before the HGU release in 1999. The company get the land use title for 10,958.4 Ha through Decree of Minister of Agraria and Chief of National Land Agency No. 3/HGU/BPN/99 dated 6 January 1999 (valid for 35 years), which are covered in two certificates of HGU by Land Agency of Musi Rawas:

- HGU certificate No. 5 (dated 8 March 1999) for 2,222.7 Ha.
- HGU certificate No. 6 (dated 8 March 1999) for 8,735.7 Ha

4.4.2

Based on document verification and interview with management, known that the process of land acquisition has been carried out since 1994 to 2001. There was land acquisition / compensation in 2003 and 2007 but only for access to the village road and not the company's operational area. Then from the results of verification from HCV document, SIA and environmental documents there was no identification of the land managed by the company from customary land. The company's HGU area is part of the community's arable land that was cleared in the period 1994 to 2001.

Based on public consultation with previous land owner and village representatives from Petrans Jaya Village, Karya Mukti Village and Lubuk Pandan Village, known that there was no customary right in or near the concession area of PT DSL. All land acquisition between local people and company representatives conducted as mutual agreement and with Bahasa that understood by all parties involved. The compensation process is done directed to the land owner and not diminish the legal/customary right; landowners are given the freedom to release their land without coercion.

Based on sample of land acquisition documentation, it was known that the land acquisition has been made in FPIC manner. The documents have been made in Indonesian language, also has involved and witnessed by community representatives such as Village Head and Sub-District Head.

An example of a compensation document that has been carried out in the name of Ishak which is addressed in the village of Lubuk Pandan, Muara Lakitan sub-district, Musi Rawas District, with the area being compensated is 2 hectares, date of payment 7 March 2000:

- Mutual agreement and handover of planting and growing compensation signed between the company and Ishak and witnessed by the Head of Lubuk Pandan Village and acknowledged by the Head of Muara Lakitan Sub-district
- Map of location that showing the compensated land.
- Receipt of compensation payment to Ishak on 7 March 2000
- Documentation in the form of photos of compensation fund submission.

4.4.3

The company can show a map showing legal rights in the form of a HGU map with a scale of 1:50,000 contained in the HGU certificate issued by the Land Office that developed through participatory mapping. Moreover, in each compensation document there are maps that are made in a participatory manner showing the location of the area to be compensated which is signed by the land owner and known by the local government. Based on public consultation with previous land owners and also village representatives from Petrans Jaya Village, Karya Mukti Village and Lubuk Pandan Village, it is recognized that they know the legal boundaries owned by PT Djuandasawit Lestari.

Based on field observations to several samples of HGU stakes determined by the auditors, namely Muara Kandis Estate (Stakes No. 47, 48, 51 and 53) and Muara Tawas Estate (Stakes No. 85, 89, 90, 91, 141 and 142), 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.

4.4.4

As explained in indicator 4.4.2, it is known that the negotiation process for land release has been carried out in a fair, open, and transparent manner and is based on the agreement of both parties without any coercion from either party. The community represents itself in the process. All relevant information regarding land acquisition is available in appropriate forms and languages.

4.4.5

Based on public consultation with previous land owner and village representatives from Petrans Jaya Village, Karya Mukti Village and Lubuk Pandan Village, known that all land acquisition between local people and company representatives conducted as mutual agreement and with Bahasa that understood by all parties involved. The compensation process is done directed to the land owner and not diminish the legal/customary right; landowners are given the freedom to release their land without coercion.

4.4.6

Implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties, it can be seen in the report on SIA management and monitoring for 2021 and 2022. Based on the results of interviews with stakeholders (Petrans Jaya Village, Karya Mukti Village, Lubuk Pandan Village and plasma cooperative representatives and previous land owner), it was informed that the company has had a positive impact such as employee recruitment, plasma provision and CSR assistance. There are no land conflicts between the community and the company, besides that the company regularly holds meetings with community representatives and absorbs community aspirations which are applied in company policies such as CSR or other assistance. Communication with the community is no problem, every request for information is always responded to by the company.

Status: Comply

4.5

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

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

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

Status: Comply

4.6

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

4.6.1

The company has procedure of Land Compensation, document No. SOP/SMART/SENS-CSR/SADV/II/002 dated 1 July 2014 related to identifying legal, customary or user rights, and for identifying people entitled to compensation. Based on public consultation with previous land owner and village representatives from Petrans Jaya Village, Karya Mukti Village and Lubuk Pandan Village known that they know about the procedure through the socialization given and they agree with the procedure.

4.6.2

The company has procedure of Land Compensation, document No. SOP/SMART/SENS-CSR/SADV/I/002 dated 1 July 2014. The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on public consultation with previous land owner and village representatives from Petrans Jaya Village, Karya Mukti Village and Lubuk Pandan Village known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the land owner and landowners are given the freedom to release their land without coercion.

4.6.3

PT DSL already has cooperation in the development of plasma plantations namely Sadar Sejahtera Cooperative. Based on the data from the farmers in the Cooperative, it is known that there are farmers with gender and women. This indicates that there are equal opportunities for men and women to have land rights in the plasma.

4.6.4

Based on the results of interviews with previous land owner, information is obtained that he has received compensation for the land he has claimed and all the files for the settlement process are also kept by the person concerned. All land claim settlement processes, from identification, negotiation to compensation, are carried out through the agreement of the parties without any coercion or pressure from other parties.

An example of a compensation document that has been carried out in the name of Ishak which is addressed in the village of Lubuk Pandan, Muara Lakitan sub-district, Musi Rawas District, with the area being compensated is 2 hectares, date of payment 7 March 2000:

- Mutual agreement and handover of planting and growing compensation signed between the company and Ishak and witnessed by the Head of Lubuk Pandan Village and acknowledged by the Head of Muara Lakitan Sub-district
- Map of location that showing the compensated land.
- Receipt of compensation payment to Ishak on 7 March 2000
- Documentation in the form of photos of compensation fund submission.

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

The company has a procedure in place to identify people and/or community groups entitled to compensation presented in document SOP/SMART/SENS/-CSR/SADV/I/003, 1 July 2014, revised 18 November 2017. The procedure is described how to identify people and/or community groups entitled to compensation. Based on public consultation with previous land owner and village representatives from Petrans Jaya Village, Karya Mukti Village and Lubuk Pandan Village known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the land owner and landowners are given the freedom to release their land without coercion.

4.7.2

The company has procedure of Land Compensation, document No. SOP/SMART/SENS-CSR/SADV/I/002 dated 1 July 2014. The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on public consultation with previous land owner and village representatives from Petrans Jaya Village, Karya Mukti Village and Lubuk Pandan Village known that they know about the procedure through the socialization given and they agree with the procedure and they can access the procedure through management representative of the company if they need it.

4.7.3

The company can show recapitulation of previous landowners who have been compensated. Based on public consultation with previous land owner and village representatives from Petrans Jaya Village, Karya Mukti Village and Lubuk Pandan Village, the communities that have lost access and rights to land also provided opportunities to benefit from plantation development such as plasma plantation cooperation, job opportunity and other benefit in the form of CSR program.

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

Based on public consultation with related government agencies of Musi Rawas District and village representatives (Petrans Jaya Village, Karya Mukti Village and Lubuk Pandan Village) and interview 2 previous land owners, known that there is no land dispute case for the last 1 years until this assessment conducted in the scope certification area. Based on interviews with management of unit certification and the results of the auditor's search on online media, there is no historical or current land dispute in unit certification.

4.8.2 and 4.8.4

The Company has established the mechanism for conflict resolution and land dispute in the procedure No. SOP/SMART/SENS-CSR/SADV/I/002 dated July 2014 revised 18 May 2016. However, based on public consultation with related government agencies of Musi Rawas District and village representatives (Petrans Jaya Village, Karya Mukti Village and Lubuk Pandan Village) and interview 2 previous land owners known that there is no land dispute case for the last 1 years.

Based on the results of the document review, there is an area in the HGU categorized as a reserve area of 3,880.76 ha which is a community area that has not been compensated. This area has not been compensated for because the cultivators do not want to release the land, while the company has obtained a HGU from the government. In relation to the area, the certification unit has made a map and reported it in the Land Use Report to the Land Office of Musi Rawas District. This is reinforced by the results of interviews and statements from the Land Office of Musi Rawas District which stated that the company had submitted reports on the use of HGU land regularly every year and that there had been maps related to the reserved area.

4.8.3

No evidences show that there is any acquisition process through dispossession or forced abandonment. Based on public consultation with related government agencies of Musi Rawas District and village representatives (Petrans Jaya Village, Karya Mukti Village and Lubuk Pandan Village) and interview 2 previous land owners, known that all land acquisition between local people and company representatives conducted as mutual agreement and the compensation process are done directed to the land owner and not diminish the legal/customary right, landowners are given the freedom to release their land without coercion.

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

Based on the cooperation agreement for the development of plasma plantations made between PT DSL with KUD, the determination of the purchase price for FFB from plasma plantations follows the determination of the FFB price by the Provincial Government of South Sumatra. Pricing is carried out every two weeks by the Team for Determining the Purchase Price for Palm Oil FFB, Sumatera Selatan Province. That is included in pricing by Musi Rawas District.

The company can show the Minutes of Meeting Results of the FFB Purchase Price Determination Team in Sumatera Selatan Province throughout 2021. Pricing is based on the price of CPO and kernels and is also adjusted to the age of the plant.

5.1.2

Based on the results of interviews with Company employees, information was obtained that all documents related to price determination issued by the Plantation Service can be accessed by farmers directly from the Plantation Service or from Plasma Assistants through communication media. In addition, the company also has a mechanism for conveying prices to farmers in the form of direct information by Plasma Assistants who make visits to farmers every day which is submitted directly to the Cooperative Management.

5.1.3

The company has determined a fair price that has been agreed with the supplier farmers, which is documented in the Cooperation Agreement, in the document there is a statement that the price set to determine the selling price of FFB is the price determined by the Pricing Team of the Plantation Office of Sumatera Selatan Province, so that the parties hereby declare that they will submit and

obey the price fixing so that one party and the other party are not entitled to ask for an increase or decrease in price. There are also specifications and implementation requirements as well as sanctions that must be met by the second party.

5.1.4

The company can show evidence that parties from the organization's representatives, both plasma smallholders and independent smallholders, have been involved in the decision-making process and understand the contents of the contract. This is stated in the Work Agreement (SPK) document which is signed by all representatives of the cooperative management and farmer groups. The Work Agreement (SPK) contains the sale and purchase agreement of FFB to independent smallholders, as well as a partnership agreement with plasma farmers.

5.1.5

The company shows the Letter of Cooperation Agreement with the Sadar Sejahtera cooperative as follows:

1. SPK number 001/SPK-TAHAP 1/SS-DSL/I/04 with an area of 2,243.15 Ha and the number of farmers is 2,189 members
2. SPK number 001 – PHASE II/SS-DSL/VII/2007 with an area of 522,022 Ha and the number of farmers 469 members
3. SPK number 01/KUD/KUD SS-DSL/I/2010 with an area of 115.05 Ha and the number of farmers is 106 members
4. SPK number 01/SPK/KUD SS-DSL/II/2012 with an area of 348,9762 Ha and the number of farmers is 351 members.

In the contract there is a term of agreement, for example in SPK number 001 – TAHAP II/SS-DSL/VII/2007 article 3 it is stated that this agreement is valid for a period of 30 years, starting from the date of signing the agreement. The SPK is signed by the company (Director) and the cooperative (chairman, Treasurer, Secretary) and recognized by the Plantation Office of Musi Rawas District, Musi Rawas Industry and Cooperative Office and Musi Rawas Regent.

Verification of documents and public consultation with community representatives and contractors during the audit showed that the contracts entered into between the company and FFB suppliers as well as local contractors were fair, legal and transparent. The plasma cooperatives and local FFB suppliers have understood the contractual agreement that they did as evidence by the agreement signed by both parties (company and plasma cooperative or contractor).

In the document there is a statement that the price set to determine the selling price of FFB is the price determined by the Price Determination Team of the Plantation Service of the Province of South Sumatra, so that the parties hereby declare that they will obey and obey the price fixing so that one party and the other party do not reserves the right to ask for a price increase or decrease.

The agreement (MoU) or contract stipulates completely and clearly the rights and obligations of both parties, the technical terms of the agreement / work to the method of payment that is fair and agreed by both parties. In the document there is a statement that the price set to determine the selling price of FFB is the price determined by the Price Determination Team of the Plantation Service of the Province of South Sumatra, so that the parties hereby declare that they will obey and obey the price fixing so that one party and the other party do not reserves the right to ask for a price increase or decrease. There are also specifications and implementation requirements as well as sanctions that must be met by the second party.

Based on the results of interviews with representatives from KUD, it is known that the work contract period will expire in the middle of 2022, and is already in the process of drafting a new work contract.

Based on the explanation above, it can be seen that the company already has an employment contract that is made fairly, in accordance with applicable law, and is transparent, and has an agreed term.

5.1.6

The Cooperation Agreement Letter explains the procedure/system for paying the net proceeds from FFB sales, both for independent FFB suppliers, collectors and plasma. Payment is made based on the Minutes of the FFB sale and purchase which has been agreed and signed by all parties.

Payment is made based on the Minutes of the FFB sale and purchase which has been agreed and signed by all parties. Based on the results of the review of documents for proof of FFB payments to KUD as well as minutes of presentation of results and explanations of operational costs for the period of May 2022, it shows that payments have been made on time and can be proven through receipts for payment. For example for May FFB payment through proof of FFB Payment to SSD Cooperative on 30 May 2022

Based on this explanation, it is known that the management unit has made fruit payments to plasma and the middleman supplier FFB in accordance with the contract it has, either the payment period or the specified price.

5.1.7

The company has tested the electronic weighbridge which was carried out on July 23, 2021 and ratified on July 25, 2021 by the Head of the Metrology Division on behalf of the Head of the Lubuk Linggau City Trade and Industry Office and is valid until June 2021 with a validity period until July 2022.

The proof of the calibration is as follows:

- Certificate of Test Results number 225/DISDAGIN/IV/2021 for serial number 150450551 with a maximum capacity of 50,000 Kg
- Certificate of Test Results number 226/DISDAGIN/IV/2021 for serial number 124151186 with a maximum capacity of 50,000 Kg
- Certificate of Test Results number 224/DISDAGIN/IV/2021 for serial number EQ 301869 with a maximum capacity of 300 Kg.

The results of observations and interviews with weighbridge operators obtained information that the certification unit has routinely performed the calibration of weighing equipment by third parties.

5.1.8

The certification unit also obtains FFB supplies from independent smallholders and smallholder schemes. Currently, independent smallholders are only at the stage of socialization and consultation with FFB suppliers, but they have not yet reached a meeting point where the suppliers will carry out RSPO certification, this is due to the factor of certification costs that are not able to be met by farmers. As for the smallholder Scheme, the certification unit has collaborated and made a partnership with Pandawa Plasma (PNDA) with a mutually agreed contract. The distribution of the proceeds from the sale of FFB, management of funds, and remittances are also described in the contract. The management of the smallholder scheme is fully managed by the company by applying the principles of oil palm plantations according to the RSPO regulations.

5.1.9

The Company has a SOP for handling complaints and complaints from various parties, namely the SOP for Handling Complaints and Dissatisfaction (SOP/SMART/SIGS-CSRD/SADV/I/003), dated July 1, 2014. The SOP describes the stages of handling complaints and complaints starting from stage of receiving complaints by KTU from internal (employees, PUK-SP) and external. The anonymity of the complainant and the whistleblower has been guaranteed since this stage. Verification and rating of complaints, preparation of handling plans, implementation of handling, monitoring of implementation, documentation to settlement through legal channels have been explained in the SOP. In the SOP it is stated that the settlement of complaints and complaints is carried out no later than 1 month after being received.

Based on the results of interviews with management, workers and also representatives of FFB suppliers, it is known that so far no complaints have been submitted to the company. The informant also added that he understood the flow of complaints to the company if they were found in the future.

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 certification unit has conducted consultations with the farmers who are the FFB suppliers to the Muara Kandis Mill as shown by the evidence of the RSPO Socialization and Company Policy minutes on 21 March 2021 which was attended by 32 participants. The activities include, among others:

- Understanding of RSPO, ISPO, ISCC and GSEP
- Environmental Management Aspect
- Aspects of Social and Community Role
- Aspects of the work environment and industrial relations

In this socialization activity, the certification unit also promoted the RSPO that in the future external FFB suppliers must also participate in RSPO certification. Based on the results of the socialization conducted to FFB suppliers, conclusions were drawn, including:

- FFB suppliers in the form of companies have not been able to participate in RSPO certification due to company policies that

have not been able to undertake to participate in RSPO certification, but currently these companies have followed ISPO certification to fulfill obligations from National regulations.

- FFB suppliers in the form of independent smallholders have not been able to participate in RSPO certification activities due to financial constraints which are quite expensive for them, but so far the implementation of their management has followed what has been socialized by companies that violate the RSPO standard.

5.2.2

Certificate holder was not developed and implemented livelihood improvement programmes including the RSPO Standard for Independent Smallholder. This because there was no Independent Smallholder in PT DSL. Which in this case, made this indicator was not applicable for the assessment

5.2.3

Certificate holder was not developed and implemented livelihood improvement programmes including the RSPO Standard for Independent Smallholder. This because there was no Independent Smallholder in PT DSL. Which in this case, made this indicator was not applicable for the assessment

5.2.4

When the audit was carried out, the certification unit had collaborated with the smallholder scheme (PNDA) since 2004 and until now the overall operational activities were carried out by PT DSL. All workers who work at PNDA are PT DSL's workers so that pesticide handler training is only provided to company workers, not to smallholder schemes. For training that has been carried out is the Integrated Pest Management Training (including pesticide handling).

The company has provided pesticide handling training to plasma farmers as evidenced by the presentation of pesticide handling training documents to the Sadar Sejahtera Cooperative whose activities were carried out on November 19, 2021, which was attended by 51 participants.

Based on the results of interviews with pesticide applicators (MTWE dan MKNE), it is known that workers have received routine training every year by the certification unit and during field visits the workers have applied good and correct use of pesticides according to the procedures owned.

5.2.5

Certificate holder was not developed and implemented livelihood improvement programmes including the RSPO Standard for Independent Smallholder. This because there was no Independent Smallholder in PT DSL. Which in this case, made this indicator was not applicable for the assessment.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1; 6.1.3

The CH already has and implements a non-discrimination and equal opportunity policy for the public, one of which is contained in the GAR Social and Environmental Policy. This policy was issued on 08 September 2015 and has been approved by the Head of Upstream, CEO-Downstream & Commercial, Executive Director & CFO, and Managing Director of Sustainability & Strategic Stakeholders. In point 3 the Work Environment and Industrial Relations states: The company provides equal opportunities for all workers, and embraces diversity regardless of ethnicity, religion, disability, gender, political affiliation, sexual orientation, or union membership. The company ensures that workers are protected from acts of discrimination at all stages of the employment relationship, there is no forced labor system that can cause human rights violations and inconvenience to employees/prospective employees in the work or recruitment process.

For example, the results of the review of the MKNE Employee Data document for the period 31 May 2022 as well as the results of interviews with estate workers and POM, it is known that there is no discrimination and treats all workers fairly, as follows:

- Composition of workers consisting of various ethnicities, religions, genders, and origins of workers.
- Recruitment of workers based on the results of selection, performance appraisal, ability and expertise of workers.

- The placement and training of workers is carried out according to their expertise/type of work, such as prospective harvest workers being placed as harvest workers and receiving regular harvesting training.
- Female workers are given the same rights, wages and opportunities for promotion as male workers of the same type of work, for example there are some maintenance foremen who are female workers.

6.1.2

Based on field observations to plantations and POM, interviews with representatives of management and workers, as well as a review of data documents on estate and POM employees, it is known that there are no migrant workers working in the company.

6.1.4

The CH representative explained that the pregnancy test was not carried out for discriminatory purposes. Pregnancy tests for workers are carried out every month only to ensure that pregnant workers are not allowed to work with chemicals, not as a basis to discriminate against such workers. If declared pregnant, the worker will be transferred to a safer job but still equal in terms of wages and other benefits, so there is no discriminatory action.

This is consistent with the results of interviews with female workers in MKNE and MTWE, one of whom is a mother who is breastfeeding. Female workers are required to do a monthly pregnancy test at the clinic to ensure that no female workers work with chemicals while pregnant/breastfeeding. During pregnancy and breastfeeding, they are transferred to jobs that are not related to chemicals, do not harm the womb, and are close to housing, so they can breastfeed as needed.

6.1.5

A gender committee has been formed and is still active today in the company, which is chaired by the committee chair and coordinator in several sections and there are representatives in each unit.

The structure of the gender committee does not only consist of female workers but also includes male workers, as follows:

- MKNE, with Chairman: Yellyanti, Secretary: Ratna Dewi, Treasurer: Asmidar
- MTWE, with Chairman: Doris Sinaga, Secretary: Fitriyanti, Treasurer: Winarti

The main purpose of establishing a gender committee is to provide a forum that can accommodate the aspirations/complaints of workers (especially women), as company partners in carrying out socialization activities related to gender and other policies related to workers' reproductive rights. In carrying out its activities, the gender committee always cooperates with trade unions so that the socialization of matters relating to women's rights can be conveyed properly and there is no discrimination in terms of gender.

The results of interviews with both male and female workers, from estates and POM, it is known that the existence of a gender committee is because it has been routinely socialized by the management. For example, the socialization at MTWE was carried out on April 20-26, 2022, which was attended by all workers during the morning assembly. From the results of the interview, it was also known that there were no complaints related to gender such as domestic violence, sexual violence, and other sexual harassment.

6.1.6

The CH has implemented the payment of equal wages, taking into account ability, performance, expertise, years of service and other factors as the basis of wages. So that the payment of wages given is in accordance with the load/task/type of work of each. Based on the salaries of employees for the period of service in May 2022, it is known that workers get a salary with a value that is in accordance with the minimum wage. The minimum wage refers to the CEO's Decree dated January 17, 2022, number 004/CEO PSM 2/HR PSM 2/01/2022 concerning the Structure and Scale of Wages for Permanent Workers of PT DSL in 2022. In the decree it is known that the lowest level of workers is PT 4 group T1 and highest PT 1 group A5. Classification is based on competence and length of service, not because of gender or regional origin, or other reasons for discrimination. Each group has a different basic wage, with the lowest basic wage of Rp. 3,300,258.00. Decree of the Governor of South Sumatra number 856/KPTS/DISNAKERTRANS/2021 dated December 28, 2021, regarding the Musi Rawas District minimum wage, in 2022 amounting to Rp. 3,299,758, -. Based on this, it is known that the wages of the lowest class have exceeded the predetermined Musirawas District minimum wage.

Some to several employees with different classes and work experience get salaries with different amounts based on length of service, ability, attendance and work performance. This is in accordance with the statements of workers interviewed with the type of work as harvesters and sprayers who have the same type of work but have different pay scales based on performance, length of work in the company, productivity and other factors.

In addition, based on the results of interviews with estate workers and POM, it is known that workers already know that there is a wage scale structure for each level of workers and this is evidenced by the difference in monthly wage income. presented on the payslip. The monthly wages received are in accordance with the grade held by each worker and so far there have been no complaints/errors related to this.

Status: Comply

6.2

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

6.2.1

The CH has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally stated in the Collective Labor Agreement for the period 2022-2024 written in Indonesian, in accordance with the Decree of the Head of the Manpower and Transmigration Office of Musirawas Regency dated February 15 2022. Made in Indonesian which explains the working conditions and rights/obligations of workers such as, recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, overtime, and other provisions.

The results of interviews with workers (harvesters, sprayers, fertilizers and factory operators) and trade union representatives know that workers have a sufficient understanding of their rights (wages, overtime, incentives, fines, etc.) routine socialization provided by the certification unit. Workers' wages in 2022 have been above the minimum wage set by the government, wages are based on years of service, ability, attendance and work performance (wage structure and scale) and there is no late payment every month.

A review of wage documents from February to April 2022 for harvest workers, pesticides, sprayers and factory operators proves that the wages received are above the minimum wage and in accordance with the structure of the wage scale determined by the unit of certification for 2022. For example, the wages of workers with Employee Number 8032 (MKNE workers) and 348 (MKNE workers) have differences based on the structure of the wage scale SK number 004/CEO PSM 2/HR PSM 2/01/2022 dated January 17, 2022.

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.

6.2.2, 6.2.3

- The CH has a CLA made in Indonesian which explains the working conditions and rights/obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, working hours, remuneration, discipline, deductions, overtime, sick leave, leave rights, maternity leave and other provisions. Explanations regarding the contents of the Collective Labor Agreement include:
- Article III regarding Employee Recruitment (recruitment, selection, transfer, promotion, performance appraisal) which explains that all workers who wish to join the company must meet the specified requirements, including: over 18 years of age, have a health certificate, take a selection exam, and other requirements.
- Article IV 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 a week and 7 hours per day or 6 working days a week, where the total working hours is 40 hours a week. .
- Article VI concerning Wages which explains the wages that cannot be lower than the minimum wage set by the government every year, the provision of rice allowances to all workers according to their calculations, and other explanations.

The CH also has decrees, policies, and employment contracts. There is no change in labor policy. The results of interviews with workers during observations at MKNM, MKNE, and MTWE revealed that workers were aware of the company's labor policies. With examples as follows:

- Director's Decree No. 004/CEO PSM 2/HR PSM PSM 2/01/2022 concerning the Structure and Scale of Wages for Permanent Workers of PT DSL Region Sumsel 1 in 2022.
- Director's Decree No. 005/CEO of PSM 2/HR of PSM PSM 2/01/2022 concerning Wages of Workers with Daily Work Agreements for PT DSL Region Sumsel 1 year 2022.
- Determination of Minimum Wage & Wage Scale Structure in 2022 is Rp. 2,630,662/month (minimum) is determined based on the Determination of Minimum Wage for Sumatera Selatan Province in 2020. For workers with the lowest wages are workers with PT 4 status class 1 T and the highest wages are for workers with PT 1 status class 5A.

- Decree of the Governor of Sumatera Selatan Province number 856/KPTS/DISNAKERTRANS/2021 concerning the District Minimum Wage of Musirawas Regency in 2022.
- Work contracts for 4 PKWTs that explain working hours, wages, BPJS, leave, overtime, and others.
- The list of wages for the month of May 2022 for all MKNM, MKNE, and MTWE workers is in accordance with the Decree of the Governor of Sumatera Selatan Province number 856/KPTS/DISNAKERTRANS/2021 concerning the District Minimum Wage of Musirawas Regency in 2022 and the Director's Decree No. 004/CEO PSM 2/HR PSM PSM 2/01/2022 concerning the Structure and Scale of Wages for Permanent Workers of PT DSL Region Sumsel 1 in 2022.
- January to March 2021 salary slips differ based on the structure of the 2020/2021 wage scale and all wages above the minimum wage.
- Overtime payment in May 2022 for PKS scale operators is in accordance with the prevailing laws and regulations for workers.
- Provisions related to deductions/penalties as stated in the Collective Labor Agreement and further explanations are regulated in an internal memo.
- In the payroll document there is information that states the results of workers' wages in one month according to the work performance of each worker. Salaries are also accurate for each worker, for example the number of working days in a month, premium payments, fines, deductions from workers' wages, and other information that is in accordance with the facts on the ground.

6.2.4

The CH has provided welfare facilities to residents in the form of housing, clinics, clean water, electricity, education, transportation and other facilities. The results of field observations in the MKNE Division 1 housing and Division 3 MTWE revealed that workers are provided with adequate housing facilities with 2 bedrooms, 1 bathroom and there is a daycare area. The house is inhabited by 1 family and specifically for unmarried workers, 1 house will be filled by 2 workers. This is in line with the results of interviews with housing residents who stated that the facilities provided by the certification unit are houses, electricity, clean water availability, school transportation, schools, child care, places of worship (mosques & churches), sports facilities and others. In general, the facilities provided by the certification unit are good/fit for use by workers and their families.

The company has compliance with the provision of clean water for employees which is available throughout the year. The auditor has conducted a field visit to the housing in Muara Tawas Estate where the water pump machine is in good condition and can be used to draw water from the reservoir used for clean water in the employee housing.

The unit of certification has also monitored the condition of the feasibility of the facilities provided every year, such as housing that is repaired if there is damage (usually if there is damage the workers will inform and will be handled directly by the repair company), the availability of electricity that has been provided by the company in the form of PLN or generator, and the availability of clean water whose feasibility is always monitored every 6 months (results of monitoring clean water in residential areas). does not show test parameters that exceed the threshold).

6.2.5

The CH has made it easier for workers and their families to get food sources by providing employee cooperatives that sell workers' daily needs and providing access to vegetable traders to sell in workers' housing areas. In addition, there are also workers who open small business stalls to sell daily necessities in each housing estate.

Based on interviews with workers (harvesters, sprayers, maintenance and factory operators), housing residents, trade unions and gender committees, it is known that workers do not experience difficulties in obtaining food sources because the company has provided a cooperative that sells daily necessities and the presence of vegetable sellers is provided. access to selling at home. In addition, workers can buy these necessities to markets around the company area with easier access.

6.2.6

In Indonesia there is no set standard of living wages, so the unit of certification still applies the national minimum wage for all workers. In addition to the payment of the minimum wage, the certification unit has carried out an assessment of the prevailing wages and benefits provided to workers in the certification unit in line with the RSPO Guidelines for Implementing a Decent Living Wage.

The unit of certification has assessed the prevailing wages and all kinds of allowances which are included in the calculation of wages, food costs, housing facility costs, non-food costs, non-housing costs, and other costs. From the results of these calculations, it is

known that there is a positive variance between the minimum wage in Musi Rawas District and the wages received by company workers (current wages and benefits in kind).

6.2.7

The CH still has non-staff workers with the status of Contract Workers (PKWT) and Permanent Workers (PT workers group 1-4). All rights for each employment status have been distinguished. For workers with contract status for contract status (PKWT), the certification unit also registers the worker with the Manpower and Transmigration Office of Sumatera Selatan Province in September 2020. Based on document review, it is known that there is no PKWT in MTWE, there is PKWT in MKNE for Plant Care work, as well as PKWT in PKS for processing work.

The results of interviews with spray workers, harvesters and factory operators found that workers understand the recruitment system, worker status and orientation period that must be passed before workers are appointed as permanent workers. These processes are stated to be quite fair and provide equal opportunities to work according to the abilities, skills and achievements of workers during the contract period. In terms of wages, it is in accordance with minimum wage standards and workers have also received BPJS and PPE from the certification unit.

Status: Comply

6.3

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

6.3.1

The CH has policies related to trade unions that have not changed since the previous audit, namely Circular Letter No. 094/CEO2-SE/12/2010 dated December 14, 2010. This policy concerning Freedom of Association in Workers' Organizations refers to Law No. 21 year 2000 on the Trade/Labour union. In addition, in Article 4 of the agreed CLA there is a record of the company's acknowledgment and guarantee against the trade union/labor union.

MKNM, MKNE, and MTWE have their own Trade Unions. They already have decrees related to organizational structure and registration letters to the Manpower Office in 2011 and 2017. In stakeholder consultations with the Musi Rawas Manpower Office, both organizations were officially registered and ratified. Based on verification and interviews, employees of PT. DSL is divided into 3 (three) labor unions, namely FSB Nikeuba, SPPPP-SPSI and SBDB-MR. All employees are voluntary and free to join trade unions.

6.3.2

The CH maintains a list of workers who have joined the union and also has records of meetings between union and management representatives as well as with internal unions. The following is an example of the minutes of meetings conducted by the union in 2021, namely:

- A meeting between the union and management representatives on December 31, 2021, to discuss changes to the attendance system.
- A meeting between the union and management representatives on 5 November 2021 to discuss housing cleanliness and working hours discipline.
- A meeting between the union and management representatives on October 8, 2021, discussed the fire and forest fire alert and housing cleanliness.

Based on interviews with representatives of trade unions and their members who are workers in each unit, it is known that every month there is a meeting in the Bipartite LKS between representatives of workers and representatives of management. From the results of interviews and document review, it is known that there are no labor problems.

6.3.3

The CH does not interfere in the selection or conduct of trade union activities. The results of interviews with workers and representatives of trade unions revealed that in the process of selecting/making decisions and planning activities, members provide input/aspirations to their respective representatives. The worker who currently serves as the Chairman of the Labor Union is the Foreman at the factory and plantation, so there will be no conflict of interest that occurs with the company.

Based on interviews with representatives of trade unions, it is also known that the company has given freedom of association and currently a trade union has been formed. The formation of a trade union is in accordance with the prevailing laws and regulations and

has been recorded in the Manpower Office. The unit of certification provides freedom for workers to express their opinions and also the unit of certification does not provide any intervention related to trade union activities.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1, 6.4.2

The CH has a policy regarding the age requirement for workers that has not changed since the previous audit, which is contained in a Circular from the Director of HR to all Heads of Units number 002/SE-HRDV/03/09 dated March 31, 2009 regarding the minimum age limit. In the employee recruitment process, there is age verification through examination of the Identity Card. The results of the verification of the estate and POM employee data documents, for the period of May 2022, it is known that there are no workers under 18 years of age.

Regarding the prohibition on hiring underage workers, it has been confirmed in the work agreement with the contractor. The CH also demonstrates the contractor's commitment in writing regarding not employing workers under the age of 18.

6.4.3

Based on field observations and interviews with workers in MKNE, MTWE, and MKNM, it is known that the minimum age for work is 18 years, and no workers are found below the specified minimum age. A review of employee data documents in May 2022, it was also found that there were no workers under 18 years of age.

The results of interviews with SJA contractors, it was found that there were no workers under the age of 18 years. The contractor also shows a work contract signed jointly by the contractor and the company, which contains a clause prohibiting the employment of workers under the age of 18. The contractor employee data shown as evidence also informs the same thing, that there are no workers under 18 years of age.

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

6.4.4

The CH has a policy regarding the age requirements of workers contained in the CLA which states that the requirement to accept workers is at least 18 years. The employment age policy is also contained in GAR's Social Environment Policy which states that it is prohibited to employ child labor and under the age of 18 (eighteen) years.

In addition to having a policy that regulates the minimum age of employment for workers, the unit of certification also contains clauses on child protection and a prohibition on employing workers under the age of 18 in any agreement with contractors. The results of interviews with contractors and evidence in contractor commitment documents as well as contractor worker data, it is known that this has been implemented by the contractor. The results of field observations of the Mill area, it is known that there are no FFB transport contractor workers under the age of 18 years.

The CH also showed socialization documents related to the ban on workers under the age of 18, which was held on October 6, 2021, to the village heads of Semeteh, Lubuk Pandan, and Lakitan.

Status: Comply

6.5

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

6.5.1, 6.5.2

The CH has a policy to protect reproductive rights and prevent all forms of sexual harassment and violence. The policies contained in the Circular Letter from CEO 2 No. 003/CEO2-SE/01/2011 dated January 10, 2011. Every worker has the right to protection against sexual harassment in the workplace. Sexual harassment is a violation and if found guilty the perpetrator of sexual harassment will be subject to sanctions in accordance with applicable regulations. This committee has been socialized to employees and committee representatives are available in each division.

The CH has also established a gender committee in each unit and its program conducts socialization to workers, especially female workers, such as policies on reproductive rights, spraying techniques, harassment or harassment at work, a complaint mechanism.

The complaint mechanism explains that the company can maintain the confidentiality of the reporter's identity based on the sensitivity of the issue, if the case goes public and risks retaliation and so on.

The PKB regulates menstrual leave for women as much as 2 days / month (first and second day) with a doctor's examination, as well as 1.5 months of maternity leave before giving birth and 1.5 months after giving birth with a doctor's examination calculation. The CH Procedure for Handling Complaints and Complaints ensures the anonymity of complainants and case reporters.

Based on interviews with male and female workers at MKNE, MKNM and MTWE they understand the policy and know how to make a complaint if they know about harassment issues. They also have reproductive leave such as menstrual leave or 2 days and maternity leave for 3 months. Based on interviews with the gender committee, no cases of sexual harassment were reported in the past year.

6.5.3

The CH has a Policy No. KHI-SMART/005-00 dated 01 August 2017 concerning Pregnant and Breastfeeding Women Workers. The policy explains the provision of special time for mothers to breastfeed their children, prohibits pregnant/breastfeeding women from working with chemicals, provides light work/which does not endanger mothers/midwifery/children, and provides a special room for breastfeeding their children.

For now, the certification unit has collected employee data every month in each unit by conducting pregnancy checks for spray employees and the result is that none of the spray employees are pregnant. From the monitoring results, the company has provided special needs for the future such as the availability of midwives/doctors at the company's clinic in preparation for childbirth, providing a special room for breastfeeding in child care and transferring pregnant workers from work related to chemicals. However, during field observations, no pesticide handlers were found, who were pregnant.

Based on interviews with female workers and representatives of the gender committee, it is known that the unit of certification has provided a special place for breastfeeding in child care centers with a special time for breastfeeding. There is no prohibition from supervisors in the field regarding this matter and especially workers in the field who do not bring vehicles will be delivered/picked up by the foreman at these times. Breastfeeding time until the age of the baby needs his mother's milk.

6.5.4

The CH already has a workers complaint mechanism, contained in Procedure No. SOP/SMART/GIMS-SCMD/USDV/001 Date 02 June 2016 rev 11 April 2017. This procedure aims to accommodate complaints and complaints from employees. In the procedure it is explained that if requested, the company guarantees the confidentiality of the reporter's identity and disclosure of disgrace or incident (whistleblower).

The results of interviews with harvesters, maintenance workers, mechanics and operators are known to know the complaint mechanism. Complaints regarding sexual harassment (women's issues) can be submitted to the gender committee. From the results of the interview.

The review of the company's complaint documents in semester 2 2021 until the audit was carried out, it was found that there were no complaints. The results of interviews with workers revealed that in the past year, there were no complaints related to sexual harassment, violence in the workplace/reproductive rights. This is in line with the results of interviews with the gender committee officials who stated that if there is a complaint of sexual harassment (women's problems) it can be submitted to the gender committee and the explanation given by the representative is quite clear and has the qualifications to handle complaints and victims; protection of anonymity and whistleblowers; pregnancy test; accessible work for gender.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1, 6.6.2

The CH has a policy regarding the prohibition of forced labor and is taking steps to prevent it. Procedures related to human resource management indicate that each worker has an employment agreement that describes a specific job description. The results of the study of the worker list document in May 2022 revealed that there were no migrant workers and forced laborers.

In the previous audit, it was found that there was no identity detention, because all labor documents for individuals were in the form

of photocopies and not original items such as ID cards, diplomas, family cards and others. The results of interviews with workers revealed that there was no substitution of contracts, because all existing contract workers currently work in accordance with existing contracts, such as contract workers for maintenance activities only carrying out maintenance activities and not employing workers other than those stated in the contract. Then it is also known that there is no coercion in doing overtime work, workers who work overtime in the company can refuse if they are ordered to do overtime activities because overtime is not the obligation of workers and the company also does not prohibit it.

Based on employee data and interviews with workers, most of the workers come from the surrounding community. They have a recruitment process in the company and are in accordance with the applicable recruitment procedures.

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 CH already has a person in charge of Occupational Safety and Health (K3) and has documented records of regular meetings between the person in charge and the workers, as follows:

OHS Committee

- Establishment of P2K3 (OHS Committee) PT Djuandasawit Lestari (MKNM) which is registered/approved by the Manpower and Transmigration Office of Sumatera Selatan Province under SK 05/KPTS/NAKERTRANS/2019 dated September 17, 2019. The organization has a secretary, an OHS Expert who already has an Authority Card from Ministry of Manpower with register number 31102/PK3/AJ/31/2019/P1 with initials FK which is valid until December 23, 2022.
- Establishment of OHS Committee PT Djuandasawit Lestari (MKNE) which is registered/approved by the Manpower and Transmigration Office of Sumatera Selatan Province under SK 024/KPTS/NAKERTRANS/2022 dated May 10, 2022. The organization has a secretary, an OHS Expert who already has an Authority Card from Ministry of Manpower with register number 14694/PK3/AJ/31/2022/P2 with initials P which is valid until February 07, 2025.
- Establishment of OHS Committee PT Djuandasawit Lestari (MTWE) which is registered/approved by the Manpower and Transmigration Office of Sumatera Selatan Province under SK 024/KPTS/NAKERTRANS/2022 dated November 22, 2018. The organization has a secretary, an OHS Expert who already has an Authority Card from Ministry of Manpower with register number 55936/PK3/AJ/31/2022/P1 with initials NWS which is valid until February 07, 2025.

OHS Committee Meeting

The CH shows the recording of the OHS Committee Meeting contained in the OHS Report to the service, including:

- MTWE OHS Meeting in March 2022 which was attended by 10 participants with discussions including the discipline of using PPE and evaluation of the OHS month commemoration event.
- MKNM OHS Meeting in February 2022 which was attended by management and members of the OHS Committee with discussions including the commemoration of OHS month, evaluation of the OHS program, and preparation of the HIRADC.

6.7.2

The CH has SOP for Handling Occupational Accidents and Diseases No. SOP/SMART/HESS-EHSD/SADV/I/005 and SOP for Emergency Response No. SOP/SMART/GENERAL/SADV/I/005. The procedure describes the handling of accidents and reporting. In an effort to ensure emergency preparedness, simulations are carried out periodically. The simulation aims to ensure the readiness of emergency response equipment in the certification unit.

The results of field observations at MKNM, offices at MKNE and MTWE, it is known that there are evacuation routes and gathering points. The results of observations at MKNM also found that the condition of the hydrant was in good working condition when tested by the MKNM emergency response team. Likewise, during field observations at the fire fighting facilities warehouses at MTWE and MKNE, a simulation of fire extinguishers has been carried out and it is known that the equipment can function properly.

6.7.3

Based on field observation and interviews with workers (harvester, loose fruit picker, pesticide applicator and mill operators) in the MKNM, MKNE and MTWE units, it is known that workers have received PPE for free according to their respective types of work and if there is PPE damaged, it can be immediately reported to the direct supervisor for replacement. At the time of the audit, all workers were seen to have used PPE in accordance with existing standards and the level of risk, such as pesticide applicators using aprons,

masks, face shields, gloves, boots, and others. Based on the results of interviews with spray workers, it is known that the PPE that is often damaged is aprons and rubber gloves, and they are replaced immediately. In line with this, the company showed an example of a handover document for the replacement of a damaged apron and rubber gloves.

The CH also has evidence of replacement of damaged PPE, as shown in one of the Requests for Replacement of damaged PPE Division 1 for January 2022. For example, harvesters with the initials N replace safety helmets and boots, harvesters with the initials BW replace boots, safety helmet, egrek gloves, and face shield. Every PPE provided to all workers (all level workers) is in accordance with the needs, type of work, risks and conditions of PPE, this has been well documented from the records of PPE provision kept by the OHS Department. This has been regulated in the hazard identification document, risk assessment and risk control (HIRAC) as well as the PPE document for Job Specifications.

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

6.7.4

The CH has had a clinic and its licensed company's doctor and paramedics. All workers including contractor's workers can use this facility. For further or un-handled medical care covered in government employment and health insurance (*BPJS Ketenagakerjaan* /employment insurance) & *BPJS Kesehatan*/health insurance). This insurance for all workers in all units have been paid monthly. For example, based on a review of MKNM payment documents, BPJS employment payments for 123 workers workers in May will be made on June 6, 2022, while BPJS Health for 123 workers workers and their dependents in early June 2022 will also be paid on June 6, 2022.

Based on document review, it is known that there were 2 work accidents in May 2021 at MKNM. Both accidents have been investigated and reported to the Manpower Office and BPJS Employment according to the applicable mechanism.

Based on document review and interview with the workers (including contractor's workers), Labor Union and Contractor, it was known that there is no issue related medical care. If the clinic cannot handle the medical care, the patient will be brought to the partner hospital in the city by company's ambulance. For contractor's workers, it is known that the accident insurance for workers is covered by the contractors.

6.7.5

Consistent from previous audits, The CH has monitored work accidents by making LTA calculations. For the period January – December 2021, as follows:

- MKNE: FR: 0 and SR: 0 with the number of hours worked per year: 1,175,365
- MTWE: FR: 16 and SR: 55 with the number of hours worked a year: 890,330
- MKNM: FR: 7 and SR: 188 with the number of working hours of employees a year: 297,087

Status: Comply

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

7.1

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

7.1.1

Consistent with the previous assessment, there were no changes or revisions to the SOP for pest monitoring and control at PT DSL. The company has procedures related to integrated pest monitoring and control, including:

- SOP for Rat Control (IK/Smart/MCAR/VII/TA-HPT/07). Census on mature plants is carried out every 3 months, namely January, April, July and October. The critical threshold for rat attack is 5% from the census. Biological control by observing owls. Chemical control using rodenticides.
- SOP for Detection of caterpillars that eat oil palm leaves (IK/Smart/MCAR/VII/TA-HPT/01). UPKDS detection is done every 2 months. When an attack occurs, there is no need for detection, but a direct census.

- SOP for Control of Oil Palm Leaf-Eating Caterpillars (IK/Smart/MCAR/VII/TA-HPT/03) by planting beneficial plants, such as *Turnera subulate* and *Cassia* spp. along Main Road (MR) and Collection Road (CR), and *Antigonon leptopus* at the corner of the block.
- Ganoderma census and control work instructions (IK/Smart/MCAR/VII/TA-HPT/10). The census was carried out on 100% of plants using a plant census map. In endemic areas, the census begins when the plant is 3 years old and if there is no attack, the census is carried out once a year.

The company can show the realization of the integrated pest control plan for 2020-2021. For example, the census records are presented as follows. Based on the census records of rats, it was found that there was an attack of rats with low attack criteria (1.09%). The results of field visits for example block J25 Division 3 Muara Kandis Estate and Block R48 Division 1 Muara Tawas Estate did not find signs of rat infestation.

To avoid P&D resistance (including weeds) and the use of prophylactic pesticides, the unit of certification has replaced and/or rotated the use of pesticides for the same target, for example in broadleaf control, the use of pesticides with the active ingredient Methyl Metsulfuron can be substituted with pesticides with the active ingredient Triclophyr Butoxy Ethyl Ester, Dimethyl Amine and Isopropyl Amine Glyphosate

In addition, during field observations carried out in the MKNE and MTWE units, it was found that there were beneficial plants planted on each edge of the block as host plants for predators to control LEC (Leaf Eater Caterpillar) and some were using it. owl (*Tyto alba*) as a pest control of rats.

7.1.2

The certification unit has shown a list of invasive species 2021 referring to Environment and Forestry Ministry Regulation No. P.09 / MENLHK / SETJENKUM.1 / 12/2016. Based on the documents shown, it is known that there are three (3) species used for biological control agencies, namely *Cassia tora*, *Turnera ulmifolia* and *Urena lobata*. Related to this, the certification unit has conducted monitoring activities to ensure / monitor their distribution.

7.1.3

Based on the document review of PT Djuandasawit Lestari IPM (IntegRated Pest Management) from 2019-2022, there are no extraordinary circumstances that require pest control with fire, the results of the document review show that pest conditions are still under control every year and below the economic threshold so there is no control chemical or fire control carried out so far. Based on the results of field visits to MKNE and MTWE, there is no indication of burn marks after using fire for pest control.

Status: Comply

7.2

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

7.2.1 & 7.2.2

The certification unit has SOPs and work instructions for weed management, guidelines covering selection, storage, application, handling of contamination, knowing the signs and symptoms of pesticide poisoning and first aid for poisoning cases. To ensure that the pesticides used are in line with the target, the unit of certification identifies the types of weeds found in the operational area.

Justification for the use of pesticides has been shown through census analysis, for example as follows:

The Census of Rats and LEC (Leave Eating Caterpillar) for MKNE in 2021 with an average attack below 2% and no signs of attack in some time periods of the 2021 census below the minimum economic threshold so that the unit of certification does not control activities properly. chemicals (pesticides) and still use natural controls such as the use of beneficial plants/predators (barn owl).

The unit of certification has documented pesticide toxicity records in the Monthly Pesticide Toxicity Data document. The document records the product name, active ingredient, LD50, area treated, amount of active ingredient applied per Ha, and total application. This document is continuously recorded and updated by the Estate Sustainability Officer on a monthly basis. The certification unit has also classified the pesticides used according to WHO classes, such as Erkaforon 20 WP (methyl metsulfuron) with the WHO classification, which is probably not available, Garlon (triclopir) with the WHO classification, which is class 3 and so on.

Brand	Active Ingredients	License number	Validity period	Utilization
Erkaforon 20 WG	Metil metsulfuron 20%	RI 01030120093530	31 January 2025	Spraying Selective, Circle Spraying

Rollup 480 SL	Isopropilamina glifosat 480 g/L	RI 01030120042133	03 September 2023	Spraying Selective, Circle Spraying
Garlon Mix 333/17 EW	Triclopyr butoxyethyl ester 333 g/l	RI 0103011984695	16 April 2023	Weeding Selective
Starane 480 EC	Fluroxypyr methyl ester 480 g/l	RI 01030120083155	02 February 2023	Spraying Selective, Circle Spraying

Based on the research of the document, it is known that the company has used registered pesticides and there is no limited use of pesticides.

7.2.3 & 7.2.4

The unit of certification has implemented IPM quite effectively, without using chemicals for pest control and not using pesticides as prophylaxis. Pesticides are used routinely for weed control and if the circle and path conditions are still quite standard then weed control will be stopped.

The IPM program has been listed which is then broken down into monthly work plans and daily work plans. The IPM program prioritizes routine monitoring of the presence of pests. Pesticides are the last alternative control if the observation shows a value above the control threshold. Basically, the application of IPM aims to minimize the use of pesticides in pest control.

The unit of certification has shown the document of the Pest and Disease Census Recapitulation which contains the realization of the implementation of pest and disease detection and census activities. Based on the realization of PT Djuandasawit Lestari's 2021 caterpillar and rat census activities, there are no indications of pest and disease attacks that are above the minimum threshold, so control is not needed.

Based on document review and field observations, several IPM programs with biological approaches have been implemented, such as control of rats by Tyto alba, and LEC (Leaf Eating Caterpillar) by planting beneficial plants such as Turnera subulata and Casia cobanensis. In addition, his party has also carried out routine early detection which is listed in the monthly report of the early warning system. There is no use of prophylaxis in 2019-2021, the unit of certification does not use pesticides for pest control at all. Based on the results of interviews with pesticide applicators at MTWE and MKNE, it is known that the use of pesticides is only for land sanitation activities as weed control and there has been no use of pesticides to control pesticides or diseases since 2019 until now.

7.2.5

The unit of certification has shown the President Director of SMART Tbk issued a memorandum not to use Paraquat in 2016. Regarding Pesticides that are categorized as WHO Class 1A or 1B, there is a Social and Environmental Policy which states to be minimized and eliminated as part of the plan, and should only be used in exceptional circumstances. extraordinary. Based on document verification and field visits to the Pesticide Storage, there is no Paraquat and WHO Class 1A or 1B, or listed by the Stockholm or Rotterdam Convention applications that the company uses.

7.2.6

The unit of certification has provided training on safe working practices in handling or applying pesticides, for example as follows:

- Best Management Practices (BMP) training which includes handling/application of pesticides, fertilization, sanitation, and IPM on 18 November 2021 at MTWE with 49 participants.
- Best Management Practice (BMP) training covering handling/application of pesticides, fertilization, sanitation, and IPM on 17 November 2021 at MKNE with 72 participants.

The results of field observations in rinse houses, PPE warehouses and interviews with MKNE and MTWE pesticide applicators, it is known that applicators have been given regular training on safe working methods. This is evidenced by the explanation of the correct way of working in accordance with procedures including how to use and handle risks in accordance with material safety sheets. There has been a work safety sheet (MSDS) and symbols of hazardous and toxic materials that are properly installed on the walls and doors of the warehouse. Pesticide applicators also use personal protective equipment in accordance with the specified hazard identification and material safety data sheets such as respirator masks, gloves, safety shoes, aprons and goggles. Furthermore, clean water and soap are available in the field. In addition, employees are also informed about safe work steps in every roll call in the morning before work. Meanwhile, the spraying workers interviewed also stated that after the spraying activity they would wash

and dry their PPE and spraying equipment (spray tanks, jerry cans, etc.), and shower/change clothes in a special place near the division office's pesticide shop. The results of field observations the company has a place to store all PPE and spraying equipment after use.

Based on the explanation above, it is concluded that those who apply pesticides are employees who have attended training, while employees understand the dangers and risks related to the chemicals used.

7.2.7

Based on observations to the Pesticide warehouses in MTWE and MKNE, it was found that all pesticides were well stored in the warehouse, separated by type, equipped with balance notes, hazard symbols, fire extinguishers, MSDS, first aid kits, etc. The former pesticide containers will be used for mixing and distributing pesticides to the field. Meanwhile, the rest is sent to the Temporary Hazardous Waste Warehouse. Moreover, based on monitoring of the employee housing complex, it is known that there is no use of used pesticide containers for household purposes.

7.2.8

The company already has work instructions related to the handling of Hazardous Waste and Ex-Chemical Packaging through the IK/SMART/LEMS-EHSD/SADV/002/001 Rev 0.0 document which explains:

- **Waste Management of Used Agrochemicals and Chemicals Packaging:**

- The used agrochemical packaging is collected and then rinsed according to the Hazardous Waste Handling IK (IK/SMART/LEMS-EHSD/SADV/002/001).
- Used agrochemical packaging that has been rinsed must be recorded in the used chemical packaging logbook form (F/SAMART/LEMS-EHSD/SADV/002/001).
- Used packaging that has been rinsed can be reused for the same activities / stockpiled / returned to the supplier or in accordance with the MSDS of the material.
- The remaining rinsing water is used again for the agrochemical mixing process.
- Manage the used packaging as stated on the packaging and/or reused for the same activities and/or returned to the supplier and/or hand it over to the Hazardous Waste Storage officer.

The company shows evidence that each pesticide package has been stored and is not used for other purposes, such as monitoring the entry and exit of used pesticide packages for the period of 2021. The document explains the number of used pesticide packages that leave the central warehouse and enter (after field application) to the Hazardous Waste Storage Pesticide packages that go out and go in are recorded based on each type of pesticide from each estate.

The results of field observations in residential areas show that there is no indication of the use of used pesticide packaging for other uses. The results of field observations at TPS LB3 in MKNE, MTWE and MKNM revealed that used LB3 packaging had been stored in Hazardous Waste Storage by first being split/chopped in order to save storage space and avoid reuse by certain parties.

Based on the foregoing, it is known that the certificate holder already has good enough documentation related to Pesticide Storage with recognized best practices so that this is declared to have been fulfilled.

7.2.9

Based on information from plantation managers, and previous reports, it is known that there is no application of pesticides through the air method by plane. All pesticides have been applied through either manual spraying.

7.2.10

The certification unit will conduct a pesticide operator health check on March 31, 2022. MKNE and MTWE have the latest list of pesticide operators of 29 workers MKNE and 49 workers MTWE. All spraying workers have had their health checked through medical check-ups, cholinesterase and spirometry, to ensure that the workers are in good health.

The auditors conducted interviews with spraying workers at MKNE, MTWE and they admitted that they did not suffer from skin diseases and itching because they always use PPE when working.

7.2.11

The company has a prohibition policy for pregnant and lactating women from work related to pesticides as stated in the PSM VPA

Memorandum 2 No.001/MEMO-VPA PSM2/04/2011 dated 8 April 2011. This policy has been implemented properly through unit certification, as confirmed to the Gender and Bipartite Committee.

Based on the records of the employee list and the list of spraying members, there are no pregnant or lactating women who work as pesticide operators. In addition, based on interviews with company representatives, it is known that the company will carry out pregnancy checks to spray officers at the beginning of every month when they are going to spray.

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 already has SOPs regarding solid, liquid and air waste management which are listed in one procedure, namely SOP for Waste Management Number SOP/SMART/LEMS-EHSD/SADV/I/002 revision to 0.0, effective July 2, 2014 which was approved by the Division Head Environmental & Sustainability.

The company also has its own procedure documents for the Management of Hazardous Waste and Hazardous Materials which are listed in the following documents: Work Instructions for Management of Hazardous Waste and Ex-Chemicals with Document Number IK/SMART/LEMS-EHSD/SADV/002/2001 revision 0.0 effective July 2, 2014 which was approved by the Division Head Environmental & Sustainability effective July 2, 2014.

All of these procedures aim to regulate the management of Liquid Waste, Solid Waste, Air Waste, Hazardous Waste Waste, Domestic Waste, and Medical Waste or Infectious Waste, whether originating from plantation operations, factory operations or the daily activities of the community or workers living in the area. in a company-owned housing complex.

Waste Management that must be carried out for such waste includes:

- Solid waste: such as empty fruit bunches, fiber, shells, is fully utilized to support plantation activities and palm oil processing mills. The company also utilizes shells and fiber which are resold to other companies to be used as fuel. In addition to being sold for the shell and fiber itself, it is also used for boiler fuel. While the empty janjang is used as organic fertilizer in oil palm plantations. Boiler ash as one of the solid wastes produced can be applied for paving roads or applied to land. Solid waste generated from domestic activities is collected and disposed of in landfills that have been determined by the company.
- Liquid waste: Liquid waste from processing at the factory is managed in a Wastewater Treatment Plant pond to then be channeled and applied to the oil palm plantation land owned by PT Djuandasawit Lestari to the location listed in the permit for the utilization of liquid waste to plantation land as stated in indicator 3.1.2 . Meanwhile, for domestic liquid waste generated from latrine activities, it is channeled into a septic tank, and for domestic liquid waste generated from bathing and washing activities, it is channeled through ditches or drainage. Drainage channels are maintained to keep functioning properly, clean and not clogged which can cause odor pollution.
- Air waste: inventoried and recorded in the GHG inventory document and carried out calculations related to the resulting emissions. The company conducts routine monitoring every month for ambient air quality testing which will then be monitored and reported in the RKL/RPL report every quarter to the relevant agencies.
- Hazardous Waste : stored in Temporary Storage in accordance with the provisions in the regulations. The handling of B3 waste is carried out in accordance with the types of characteristics regulated in the IK/ Hazardous Waste Management (IK/SMART/LEMS-EHSD/SADV/002/001). All Hazardous Waste must not be utilized without a Hazardous Waste Utilization Permit from the relevant Agency, therefore it must be submitted to the collector of funds or transporter of Hazardous Waste.
- Medical Waste: stored in the medical waste bin that has been provided and identified for later if it has been collected it will be sent to the Nearest Hospital which has facilities and permits for destruction.

The company has also prepared special documents related to waste management and monitoring with a quarterly period contained in the Pollution Control Report document. The report is also included in the RKL/RPL Report document every semester, and has a Special Report related to Hazardous Waste management contained in the Hazardous Waste Management Reporting document every quarter. The company has also reported the document as evidenced by the document reporting receipt, including the following:

- Receipt for reporting RKL/RPL documents for semester 1 of 2021, through SIMPEL with ID TTE Number 1625102726-2005

which was reported to KLHK on July 1, 2021 and has been known by the Environmental Service of Musi Rawas District, Sumatera Selatan Province.

- Receipt for reporting the RKL/RPL document for semester 2 of 2021, through SIMPEL with ID TTE Number 1642216106-2005 which was reported to KLHK on January 15, 2022 and has been known by the Environmental Service of Musi Rawas District, Sumatera Selatan Province.

The company has and can show documents that can prove that B3 waste is only sold/transferred to parties who have permits from the Ministry of Environment and Forestry, and the Director General of Transportation through evidence of Hazardous Waste Manifest documents on behalf of PT Primanru Jaya. The following are some examples of manifest data from transportation carried out at MKNE Hazardous Waste Storage, MKNM Hazardous Waste Storage, MTWE Hazardous Waste Storage, and outside the scope of certification, namely PDNA (Pandawa Plasma) and MKNM on February 16, which were transported by vehicles with police number B 9026 JXR, among others:

Festronik LB3

Manifest Number	Type	Weight	Unit	Truck License Plate	Date
KLHK-1646718693	Used Rags Filter	836	Kg	B9026JXR	16 February 2022
KLHK-1646716981	Used ACCU	410	Kg	B9026JXR	16 February 2022
KLHK-1646718661	LED Lights	20.4	Kg	B9026JXR	16 February 2022
KLHK-1646718542	Used Catridge	3.8	Kg	B9026JXR	16 February 2022
KLHK-1646718578	Medical Waste	1.5	Kg	B9026JXR	16 February 2022
KLHK-1646718650	Used Rag	94.5	Kg	B9026JXR	16 February 2022
KLHK-1646718641	Used Oil	3000.2	Kg	B9026JXR	16 February 2022
KLHK-1646891272	Used Packaging	4000.761	Kg	B9026JXR	16 February 2022

Based on the comparison of data between the minutes of Hazardous waste transportation, manifest, logbook, and Hazardous waste balance, it can be concluded that all waste produced has been recorded and transported at the same time with the appropriate amount. The company has also compiled documents related to the management and monitoring of Hazardous waste every quarter in the form of a Report on the Implementation of Hazardous Waste Management for the period of quarter I, II, III and IV of 2021 and the first quarter of 2022, and reported it to the Environmental Service of Musi Rawas District, with evidence:

- Receipt for reporting the RKL/RPL document for semester 2 of 2021, through SIMPEL with ID TTE Number 1642216106-2005 which was reported to KLHK on January 15, 2022 and has been known by the Environmental Service of Musi Rawas District, Sumatera Selatan Province.
- Receipt of LB3 Management report for Quarter III 2021 dated October 25, via SIMPEL with TTE ID Number: 1635925436-522 which is reported to the South Sumatra Provincial Environmental Service.
- Receipt of the LB3 Management report for Quarter IV 2021 dated January 31, 2022, via SIMPEL with ID TTE Number: 1644637376-20005 which is reported to the South Sumatra Provincial Environmental Service.
- Receipt of the first Quarter 2022 LB3 Management report dated April 9, 2022, through SIMPEL with TTE ID Number: 1648780383-2005

Based on the results of interviews with the Environmental Officer, it can be seen that the company has routinely carried out testing and monitoring of test results and made reports for the management of the waste and reported it to the relevant agencies in accordance with the required provisions.

The results of field observations at MKNM, MKNE, MTWE, and housing areas also show that the company has carried out waste management in accordance with its SOP. The results of interviews with workers and the surrounding community also obtained information that there were no complaints related to the waste produced by the company. Based on this information, it can be concluded that the company already has a waste management SOP and has been implemented properly.

Based on the results of interviews with the Environmental Service of Musi Rawas District, it is known that the certification unit has complied with all reporting provisions relating to environmental management aspects (such as waste management and pollution) in accordance with the provisions of laws and regulations in a disciplined and orderly manner. It is not known that there have been

cases of environmental pollution that caused negative impacts to the community and the environment around the company due to the company's operational activities. It is also known that the certification unit has never experienced delays in mandatory reporting related to the results of monitoring and management of liquid, solid, and air waste to the relevant agencies.

7.3.2

Based on interviews with company management and the LB3 Warehouse Head at MTWE, MKNE and MKNM, it was found that they had an understanding of the handling of waste disposal, especially Hazardous waste and non- Hazardous waste and Hazardous waste management in accordance with procedures owned by the management unit. In addition, respondents also stated that these regulations are strictly enforced and there are sanctions for those who violate them. All waste disposal facilities have also been provided by the company such as organic and non-organic waste bins as well as domestic waste transportation which is carried out twice a week.

The results of field observations at MKNM, MKNE, MTWE, and housing areas also show that the company has carried out waste management in accordance with its SOP. Interviews with workers and the surrounding community also obtained information that there were no complaints related to the waste generated by the company. Based on this information, it can be concluded that the company already has a waste management SOP and has been implemented properly.

7.3.3

The results of field visits in several areas of estate or Mill did not find any indications of waste destruction by open burning.

Status: Comply

7.4

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

7.4.1

The unit of certification has demonstrated the SOP for Fertilization (SOP/SMART/MCAR/IX/TA-PPK) which is intended as a guideline for applying fertilization in accordance with management policies. The scope of fertilization activities in the SOP includes all activities related to fertilization of oil palm in nurseries, immature plants and yielding plants, both inorganic fertilization and by oil palm products based on the results of soil and leaf analysis. The unit of certification has implemented procedures to optimize production, including:

- SMARTRI takes soil and leaf samples regularly to ensure the elements needed by plants to produce optimally. The results of the analysis of the tested soil and leaves will be the basis for determining the dose of fertilization in each Estate.
- Fertilization activities that prioritize the principles of being on time, right on target, right dose and right application. In addition, marginal soils are given extra fertilization in the form of empty bunches at a dose of 250 kg/stand.
- The application of palm oil effluent (POME) to increase soil fertility with a total liquid waste discharge applied during January - December 2021 of 227.10 m3.
- Maintenance of cover crops to reduce evaporation (maintain soil moisture). For example, the cultivation of legumes (*Mucuna bracteata*) and the maintenance of soft ferns (*Nephrolepis bisserata*). All spraying employees are always advised to not spray the plants on apple mornings.
- The company's commitment to no longer use herbicide-based active ingredients since 2016. Based on information from managers and staff, this shows the company's commitment to support the RSPO guidelines in reducing/not using class 1A and 1B.
- Monitoring the implementation of SOPs, among others, is carried out through an internal audit mechanism carried out by the OIA Department every semester.

Based on observations at MKNE Blok K33 Division 2 it was found that POME had been applied to the land in accordance with the permits and recommendations owned. This activity shows the company's efforts to increase the organic content of the soil so that it increases the soil nutrients needed by roots, especially on marginal soils and does not overflow/spill into the field.

7.4.2

The Certification Unit routinely monitors changes in nutrient status based on SSU and LSU analysis to determine fertilizer recommendations. Sampling sites have been determined in each division and block on a regular basis by the SMART Research Institute (SMARTRI) and are supported by trained census officers in each plantation. LSU is conducted annually. The last LSU results were issued on April 19, 2022, the indicators observed included levels of N, P, K, Mg, Ca, B, Zn, Cu, Cl, Fe and Na as well as

supporting data in the form of visual observations. SSU was conducted on November 10, 2021. The evaluation of soil fertility status at PT Djuandaawit Lestari was to observe the determination of pH, organic C content, total N (in%), total and available P content, K content, Mg content, Na content, concentration Na, Ca content and Cation Exchange Capacity (CEC). Visual observations are carried out every year during leaf analysis activities. Visual observations are considered in determining fertilizer recommendations, nutrient deficiencies and analyzing potential diseases that may become endemic for certain diseases.

7.4.3

The unit of certification has several procedures that explain nutrition recycling strategies that have been implemented in the field, including:

- SOP/SPO/SMART/LH-09 on Waste Management
- IK. SMART/MCAR/IX/TA -PPK / 14 concerning Fertilization with Palm Oil Mill Liquid Waste
- SOP/SMART/LEMS-EHSD/SADV/II/002 Rev 0.0 regarding Waste Utilization

In addition to chemical fertilizers, the certification unit has also implemented a nutrient cycling strategy for soil fertility purposes, through the application of by-products, such as empty fruit bunch mulch (EFB) and land application with palm oil mill effluent (POME). The OPEFB mulch dose is 40 tons/ha/year (or about 250-300 kg/palm/year) on mature land, depending on field conditions. Furthermore, the dose of POME given is around 750 m³/ha/year. For example, a by-product application note is presented as follows:

- From January to December 2021, the total EFB applied at MKNE Estate was 61,601.90 tons. Based on observations to MKNE Division 3 Block J25, it is known that OPEFB has been applied to between and between palms with a dose of 250 kg/stand.
- From January to December 2021, the total POME applied to the permitted area is 150,765 m³. Based on observations to MKNE Division 2 Block 33 and 34, it is known that LA has been implemented well. No overflow/spill into the field.

Visually there were no symptoms of nutrient deficiency in the visited blocks. Until recertification, the certification unit has not carried out replanting activities, so there is no use of oil palm pulp after replanting

7.4.4

The unit of certification shows fertilizer application records for the period January to December 2020. For example, PT Djuandasawit Lestari's 2021 fertilizer application summary is summarized in the following table:

No	Fertilizer Type	Plan (Kg)	Realization (Kg)	Percentage (%)
1	Urea	1,080,100	1,080,100	100
2	RP	995,600	995,600	100
3	TSP	42,100	42,100	100
4	MOP	1,895,700	1,895,700	100
5	Dolomite	971,350	1,123,250	100
6	K. Granular	131,550	30,350	23
7	K. Powder	2,300	2,300	100
8	HGFB	18,112	18,112	100

Based on the table above, it is known that fertilization has been well recorded by the garden manager. Based on document review and interviews with staff, fertilization realization in each plantation reached 100% in 2021 and was completed according to the program.

Status: Comply

7.5

Practices minimize and control erosion and degradation of soils.

7.5.1

The company has a soil suitability map report issued by Plantation Monitoring and Planning Division year 2015 which included a description of the soil types, topography, soil texture, drainage condition, land suitability level, and the limiting factor. The map is available on a 1: 75,000 scale. Soil types in PT DSL such as typic endoaquept, typic dystrodept, and typic hapludults. This type has a texture of sandy and sandy clay with land suitability values in the S2 and S3 classes. The limiting factors are soil texture, drainage, topography, and rocks in the root zone. The strategy made by the company to optimize the potential of the land with the limiting factor is by providing extra organic fertilizer (empty fruit bunch) at a dose of 40 tons/ha.

7.5.2

Until the Audit Activity is carried out in 2022, the management unit has not carried out replanting activities nor has the replanting plan. Results Based on a document review, it is known that until 2023 there is no plan for replanting activities within PT DSL. Replanting activities are planned to be carried out in 2024.

7.5.3

The Company has a Semi Detailed Soil Map which contains land map units and contains information: soil classification, texture, depth, drainage, limiting factors, rocks, and information on suitability for oil palm plantation development (as described in indicator 7.5.1).

Based on the map, it is known that the company manages the area with slope category > 40% in MTWE Estate with an area of 12.27 Ha or about 0.3% of the total area managed by MTWE Estate. The results of interviews with management revealed that the company continues to routinely monitor the erosion rate for the area and until the audit activity was carried out there had never been a significant erosion rate in the area, in this case the management indicated monitoring of erosion stakes in 2021. It was further explained that the consideration separately will be carried out by the management when the area will enter the replanting period. Considerations in this case include whether the area will continue to be processed or will be used as a conservation area.

The results of interviews with management revealed that in monitoring the occurrence of erosion in areas with a certain slope, the company already has erosion stakes that are monitored and recorded every month. The following is a brief summary of the monthly monitoring report for erosion stakes in 2021: Observation of erosion stakes was carried out in Block K25 Division 3 MKNE upper slope position Average 300 mm, average erosion stake 300 mm, bottom erosion stake Average 300 mm. This means that in the last 1 year there has been no significant decrease in sloped contour soil erosion.

The results of the field visit show that the company has implemented the principles of land clearing in accordance with the SOP for New Land Clearing. These include making contour terraces, maintaining the growth and development of *Neprolephis bisseRata* ferns and planting LCC to maintain erosion rates, especially in areas with a certain slope. The results of interviews with management revealed that initially the entire area, including land with a certain slope, had been planted with LCC with the type *Mucuna bracteata*, but for now the LCC conditions are not as evenly distributed as at the beginning of planting.

Status: Comply

7.6

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

7.6.1

The certification unit has a soil suitability map report issued by the Plantation Planning and Monitoring Division in 2015 which contains a description of soil type, topography, soil texture, drainage conditions, land suitability level, and limiting factors. Maps are available in 1:75,000 scale. The soil types in PT Djuandasawit Lestari are endoaquept type, dystrodept type, and hapludult type. This type has a texture of sandy loam and sandy loam with land suitability values in S2 and S3 classes. The limiting factors are soil texture, drainage, topography, and rocks in the root zone.

To overcome the limitations of the soil as mentioned above, several strategies that have been carried out by garden managers include: fertilizing following the advice of agronomists, applying EFB mulch to low fertility land at a dose of 250 kg/stand, fertilizing with POME, stacking midribs parallel to the line. contours in hilly areas and/or U-shaped in flat to wavy areas, as well as to maintain soft grass and selective weeding aimed at maintaining soil moisture.

7.6.2 & 7.6.3

Since the audit activity was carried out in 2020, the management unit has not carried out any replanting or new development activities. Likewise with the replanting plan. Based on the results of the document review, it is known that in 2024 there is a plan for replanting activities within the scope of PT Djuandasawit Lestari certification.

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 until 7.7.7

Based on soil suitability map report issued by Plantation Monitoring and Planning Division year 2015 which included a description of the soil types, topography, soil texture, drainage condition, land suitability level, and the limiting factor. Soil types in PT DSL such as

typic endoaquept, typic dystrodept, and typic hapludults. There is no peat soil in operational area PT DSL.		
	Status: Comply	
7.8		
Practices maintain the quality and availability of surface and ground water		
7.8.1		
<p>The company has a SOP for identification, management and maintenance of water sources and quality as stated in the SOP for Management and Monitoring of Water Resources Number SOP/SMART/BCOS-EHSD/SADV/II/2004 rev 0.0 which is approved by the Head of Upstream and is valid since 1 July 2014. The purpose of this SOP is to maintain the existence and sustainability of the condition, nature and function of water resources so that they are always available in sufficient quantity & quality to meet plantation operational needs.</p> <p>The SOP describe as follows:</p> <ul style="list-style-type: none"> • Identification of water sources: Rivers, PKS Reservoir (Surface Water), Estate Water Reservoir (Surface Water), and Drilling Wells (Underground Water). • Management of water sources: delimits at least 50 m (according to the HCV recommendation), 10 m buffer zone for water storage areas, all water sources are identified, warning signs and mapped. • Maintenance of water sources: demarcation of riparian (rivers) and creating a 10 m buffer zone around the catchment area, prohibition of spraying and fertilizing as well as socialization, periodic water quality analysis, and distance from housing and other activities that can contaminate water sources at least 1000 m. <p>The company has also identified water sources in the company area with identification results in the form of reservoirs, rivers, and drilled wells. This can also be proven through a map of water sources with a scale of 1:70,000 made in 2016 which was approved by the Head Upstream. The map clearly describes the location and position of water sources and bodies in the company area. Based on the results of field visits to the MKNE river border area and MTWE Estate, it is known that the location of the water source is in accordance with the map owned</p> <p>The company has a surface water quality monitoring program which is carried out every 6 months and which is carried out by a KAN accredited Laboratory (LP-001-IDN) on September 29, 2021. The monitoring locations are at 9 sample points which are divided into 4 rivers and 1 holding pond. MKNM covers all areas of the company's operations, namely the Aur River, Lakitan River, Bakul River, and Temani River. The company conducts surface water testing using quality standards that refer to class II quality standards based on South Sumatra Governor Regulation No. 16 of 2005. The results of these tests will then be reported to the relevant Office through the RKL-RPL Report every semester with reporting evidence as stated in indicator 3.1 .1</p> <p>The following is a surface water quality monitoring program carried out by the certification unit in the 2nd semester of 2021, namely:</p> <ul style="list-style-type: none"> • Monitoring of Wastewater which is conducted once a month. • Monitoring of Surface Water located in the Lakitan River, Tampungan Water Pool, Temani River, Bakul River and Aur River which is carried out every 6 months. • Groundwater monitoring is carried out at 3 monitoring wells at the Muara Kandis Plantation location every 6 months. <p>Based on the results of field observations to several rivers around MKNE, and MTWE as well as based on interviews with workers and the surrounding community, it is known that there are no environmental pollution issues in water sources around the company area. This shows that the company has made well-planned, measured, and monitored water resource management efforts.</p>		
7.8.2		
<p>The company can show the documents for managing and maintaining water sources contained in the Report on the Implementation of Management and Monitoring of High Conservation Value Areas in 2021, which describes the efforts that have been made to manage and maintain water sources in operational locations during the past year. From the documents shown, it is known that several activities have been carried out by the management unit to manage water and maintain water sources, including:</p> <ul style="list-style-type: none"> • Training for employees related to the management of conservation areas including river borders for no spraying activities and not throwing waste into rivers on August 21, 2021 • Planting fertiver plants along the canal to prevent landslides/erosion. • Planting of trees on riverbanks. 		

- Conduct periodic monitoring of surface water quality in the Upstream and Downstream of the river which is carried out every 6 months.
- Determination of buffer zone for river border area.
- Installation and maintenance of warnings/signboards and boundary markers in river border areas and their condition is monitored every 6 months.
- Security and protection of the area by means of security patrols that are carried out every week, and the results of the patrols are recapitulated monthly and for one semester to be later reported in the report on the implementation and management and monitoring of HCV areas.
- Conducting socialization related to the use and saving of water to all workers and residents of housing.
- Regularly check the existing water distribution infrastructure to ensure there are no leaks or damage every month.
- Perform canal maintenance by implementing a washing/dredging program to maintain shallowness.

Based on field observations through the Petanang River border area in Block D57 Div II MTWE, and the Temanis River in Block J23 Div III MKNE it can be seen that the company has managed the river border by installing signboards with signboards as HCV areas and painting on oil palm trees as signs. spray limit. For several HCV locations in the form of river borders, succession has been seen with the natural growth of local plants. In addition, the company also planted fertiver plants along the canal to prevent landslides and erosion and maintained the canal with a washing/dredging program to protect it from silting.

7.8.3

The management of liquid waste from the processing of palm oil with a capacity of 60 tons of FFB/hour is carried out in the WWTP pond located in the company's Business Use Rights (HGU) area. Before being channeled to the Land Application, all liquid waste is put into the WWTP with a multi feeding system which is then processed to reduce pollutant elements until it is suitable for application to land. The certification unit has 6 WWTP pools with a total capacity of 78,000 m3. POM liquid waste is managed according to the applicable national regulations, namely KepmenLH No.28 & 29 of 2003 regarding Technical Guidelines for the Assessment of Wastewater Utilization from Palm Oil Plantations for Land Application.

The company already has a permit for the use of liquid waste for Land Application (LA) from the authorized agency in the form of an Extension of Permit for Utilization of Palm Oil Industrial Wastewater on Oil Palm Plantation Land for PT Djuandasawit Lestari based on the Decree of the Regent of Musi Rawas Number 456/KPTS/DLH/2017 dated 6 July 2017 and valid for 5 years from the date the decision was made.

The company can show the results of measuring the quality of liquid waste that is applied to the land, namely the results of the liquid waste testing that are listed in the Environmental Pollution Control document for the third and fourth quarters of 2021 and the first quarter of 2021, and the RKL-RPL report for the first and second semesters of 2021.

This test is carried out by a KAN accredited laboratory with the number (LP-1148-IDN) with reference to the KepMenLH regulation Number 28 of 2003. The results of the waste quality test for the period October – December 2021 (Quarter IV 2021) are as follows:

Liquid Waste Test Results

Parameter	Unit	Threshold*	October 2021	November 2021	Desember 2021
pH	-	6 - 9	7	7	8
BOD	Mg/l	5000	875	3,700	3,400
COD	Mg/l	-	9,643	10,154	10,354
Minyak/Lemak	Mg/l	-	32	20	60
Kadmium	Mg/l	-	<0.0473	<0.0079	<0.0079
Tembaga	Mg/l	-	0.400	0.1104	0.2000
Timbal	Mg/l	-	<0.0115	<0.0115	<0.1156
Seng	Mg/l	-	0.500	0.01741	0.4

*Threshold accordance to KepMenLH Number 28 year of 2003

Based on the results of interviews with the Environmental Service regarding the management of liquid waste at WWTPs, there were no issues related to environmental pollution, the results of interviews with people from villages around the company also stated that there was no pollution from liquid waste produced by the company. Based on this explanation, it can be concluded that the company has complied with the quality standards of wastewater discharged and/or utilized in accordance with the quality standards of waste

water disposal and/or utilization and has not caused pollution to the environment.

7.8.4

The company already has a water use/utilization permit that is owned by the company, which is based on the Certificate of Fulfillment of Requirements from the Investment and One Stop Service Office Number 0100/DPMPTSP.V/III/2022 concerning Technical Recommendations for Water Resources Concession Permits, Water Resources Management Agency Number 610/3769/DPSDA-BM/XII/2021. This permit decision is effective from December 30, 2021 until December 30, 2022. It is explained in the document that the company has an obligation to take water from permitted sources, with a water quota that can be utilized of 48,000 m³/month.

The company can also show the results of the recapitulation of water use for the period June 2021 to May 2022. Based on this data, it can be obtained that the average water use for the FFB processing process is 14,035.65 m³/month while the total water use is 0.89 m³/month. The data shows that the company uses surface water that is in accordance with the quota specified in the permit and a budget that is determined by the company itself.

The company can also show proof of payment of water levies to the UPTB for Management and Regional Revenue of the Musi Rawas 1 Region for the period from June 2021 to May 2022 with the payment period being made once a month at the end of each month. Example of proof of payment of the last water retribution:

- Surface Water Tax Return and Bank Transfer Proof dated February 3, 2022 for the period of water use in January 2022.
- Surface Water Tax Return and Bank Transfer Proof dated March 8, 2022 for the period of water use in February 2022.
- Surface Water Tax Return and Bank Transfer Proof dated 7 September 2021 for the period of August 2021 water use.

Based on the explanation above, the company already has water usage documents for palm oil processing units along with supporting documents in the form of Surface Water Use Permit Documents, recapitulation of water use, as well as proof of payment of retribution for surface water use.

Status: Comply

7.9

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

7.9.1

The company utilizes solid waste to increase the efficiency of the use of fossil fuels and to optimize renewable energy which can be proven by documents recording the implementation of solid waste utilization. This can be shown in the document recapitulation of waste utilization for the period January – December 2021 with the following data:

Waste Sources	Units	Produced	Utilized	For sale
Number of Shell Utilization	Ton	17,277.35	1,718.71	15,558.64
Total Fiber Utilization	Ton	37,450.77	37,450.77	0
Number of Empty Plan Utilization	Ton	62,917.29	62,917.29	0
Amount of Liquid Waste Utilization (Effluent)	m ³	150,765	150,765	0
Amount of Boiler Ash Utilization	Ton	716,06	716,06	0

The company uses shells and fiber as boiler fuel to generate turbine power, which can reduce the use of fossil fuels. There is the documentation of shells and fiber uses on document of "*Perhitungan Efisiensi Energi*" period Jan 2021 to Dec 2021. For example, use of shells and fiber period Jan to Dec 2021 has produces 4,280,880.00 kWh of electricity from turbine, while electricity generated from diesel fuel 172,330.64 kWh. The efficiency renewable energy use per ton of palm product in the mill is 14.29 KWh / MT CPO.

Based on the results of interviews and document verification, it shows that all solid waste in the form of shells and fiber is used to substitute diesel fuel as boiler fuel, while empty fruit bunches are used for fertilizer substitution by being applied to the land. The company also utilizes liquid waste which is used to substitute fertilizer for land through Land Application. All of these wastes are utilized and recorded usage data in detail and traceable. However, until this audit stage is carried out, the company has not utilized waste air.

Status: Comply

7.10

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

7.10.1

The company has inventory data of GHG emission sources listed in the identification document of greenhouse gas emission sources for the period of Jan - Dec 2021, including:

Sources of GHG emissions produced by the Estate	Sources of GHG emissions produced by the Mill
<ul style="list-style-type: none"> • GHG of N Fertilizer • GHG of P₂O₅ Fertilizer • GHG of MgO Fertilizer • GHG of K₂O Fertilizer • GHG of CaO Fertilizer • GHG of Borate Fertilizer • GHG of ZnSO₄ Fertilizer • GHG of CuSO₄ Fertilizer • GHG of MgSO₄ Fertilizer • GHG of CaCO₃ Fertilizer • CO₂ from herbicides, pesticides and rodenticides • CO₂ from the use of diesel in the estate • CO₂ from using diesel for transport to palm oil mills 	<ul style="list-style-type: none"> • CO₂ of energy production • CO₂ fossil from electricity • CO₂ fossils from diesel consumption • CH₄ POME processing • CO₂ NaOH Utilizing • CO₂ Phosfat Utilizing • CO₂ EDTA Utilizing • CO₂ Sulfit Utilizing • CO₂ Alum Utilizing • CO₂ Sodium Carbonat Utilizing • CO₂ CaCO₃ Utilizing • CO₂ from the use of diesel to transport CPO

The emission sources inventoried by the company have covered all activities in PT DSL. Based on the information above, it can be concluded that the company has conducted an inventory of GHG emission sources in its operational scope.

The unit of certification has plans for reducing greenhouse gases and energy efficiency as follows:

- Consistency of checking the nozzle of the transport engine, calibration of the fuel injection pump, and calibration of the fuel dispenser to prevent wasting diesel fuel in the combustion chamber.
- Optimizing the use of compound fertilizers as a substitute for single fertilizers
- Tyto alba breeding as a biological pest control for rat
- Efficiency of water use (reuse from rinse room for spraying activities, recording of water for afdeling and domestic needs, use of water dilution from fresh water to ex condensate decoction, use of ex vacuum water to vibrating moderbak, consistency in inspection and maintenance of shoot blowing conditions and their operation to increase the efficiency of the steam boiler so that water consumption can be reduced.
- Consistency in inspection and maintenance of shoot blowing conditions and their operation to improve steam boiler efficiency so that the use of shell/fiber as fuel can be reduced.

The company shows identification documents of activities that produce emissions for the period 2021 for Mill and Estate. Sighted the result of identification of emissions and pollution as well as its sources, such as in estate emissions sources are from fossil fuel usage for transportation and generator, emission from fertilizer usage, pesticide usage and electricity usage. Identified the sources of emission and pollution from mill such as fossil fuel usage, electricity usage and effluent.

GHG calculation on 2021 for Jan to Des period shown net emission of GHG are decreasing compared to 2020 net GHG is 1.02tCO₂e/t product meanwhile for year 2020 period shown net emission GHG is 1.57 tCO₂e/t product.

Calculation of GHG and its monitoring has conducted by sustainable department. GHG emission calculated using RSPO palm GHG calculator 4.0 Summary of GHG emission for Muara Kandis POM and its supply base are listed as follows:

Summary Emission:

Emission Production	tCO ₂ e/t Product
CPO	1.02
PK	1.02

Extraction	%
OER	22.15
KER	6.15

Land use	Ha
Oil palm planted on mineral soil	9,487.95
Total oil palm planted area	9,487.95
Conservation area (Non-Forested)	448.00

Mill Emissions and Credit

Description	tCO₂e	tCO₂e/tFFB
Emission Sources		
POME	56,429.02	0.20
Fuel consumption	612.34	0.00
Grid Electricity Utilization	0.00	0.00
Credits		
Export excess electricity to housing & grid	0.00	0.00
Sale of PKS	0.00	0.00
Sale of EFB	0.00	0.00
Total	57,041.36	0.20

Estate Field Emissions and Sinks

Description	tCO₂e	tCO₂e/t ha	tCO₂e/t FFB
Emissions sources			
Land conversion	46,157.08	4.86	0.20
CO ₂ emission from fertilizer	13,972.26	1.47	0.06
N ₂ O emission from peat	0.00	0.00	0.00
N ₂ O emission from fertilizer	10,936.60	1.15	0.05
Fuel consumption	3,078.01	0.32	0.01
Peat oxidation	0.00	0.00	0.00
Sinks			
Crop sequestration	-54,569.45	-5.75	-0.23
Sequestration in Conservation area	-448.60	-0.05	-0.00
Total	19,125.90	2.02	0.08

Emission from Palm Kernel Crusher

Emission source	tCO₂e
PK from own mill	0.00
PK from other sources	0.00
Fuel consumption	0.00

Total crusher emissions	0.00
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Production

Production	t/yr
FFB processed	287,878.27
CPO Produced	23,989

Based on the explanation above, it is known that the Certification unit already identified GHG emission sources and also monitored the net emission through Palm GHG Calculator and Publicly reported.

7.10.2

The company shows identification documents of activities that produce emissions for the period 2020 for Mill and Estate. Sighted the result of identification of emissions and pollution as well as its sources, such as in estate emissions sources are from fossil fuel usage for transportation and generator, emission from fertilizer usage, pesticide usage and electricity usage. Identified the sources of emission and pollution from mill such as fossil fuel usage, electricity usage and WWTP.

7.10.3

The company has a GHG mitigation plan document under the name of the latest PT Djuandasawit Lestari Greenhouse Gas Mitigation Program document issued on May 31, 2022. Programs and realizations related to greenhouse gas mitigation that have been carried out include:

- The company demonstrates monitoring of fiber and shell usage as well as efficiency analysis. Data on the use of Empty Fruit Bunch (EFB), fiber, and shells used for combustion so that they can substitute for diesel fuel used are available along with the results of analysis and calculations.
- The company has monitored the use of fertilizers in accordance with the recommended dose to reduce emissions due to fertilization
- Calling for saving electricity usage to all employees and the community around the company
- The company has a plan to replace the use of TL lamps to SL types for office use, and is planned to be realized in the middle of 2022
- The company has monitored the use of pesticides in accordance with the recommendations to reduce emissions due to spraying activities.
- The company has monitored the use of electricity in housing and carried out socialization of saving electricity.
- The company planted fertiver grass inserts in river border areas such as the Lakitan River, Temani River, Tawas River, and Bakul River.
- The company conducts periodic testing of fixed source emissions and mobile source emissions
- The company performs routine maintenance on factory machines such as sterilizers, generators and others.
- The company has conducted socialization related to the prohibition of burning waste for residential areas and estates, calling for saving electricity usage to all employees and communities around the company.
- Planting useful trees to capture the carbon gas produced
- Perform periodic vehicle repairs and monitoring
- Monitor fire-prone areas

Plans to reduce or minimize have been implemented and monitored as explained in RKL-RPL semester I and semester II the year 2021. According to RKL-RPL report, the company conducted routine environmental quality test regularly once in three to six months for the following parameters:

- Wastewater quality testing
- Ambient air quality testing
- Air quality testing (generator, boiler, transportation)
- Stench quality testing
- Noise (machinery) testing
- Building shock vibration testing
- River water quality testing (biological/plankton/bentos, chemical compounds)

From all the quality testing that has been conducted as explained above by the company with help from third party (in this case, accredited laboratory), it is known that the results of the test were still in accordance with the applicable standards.

Muara Kandis POM have been implemented fossil fuel reduction by fiber/shell usage for the boiler. Fiber/shell was produced from Free Fruit Bunch waste production and being storage in certain area to be reused as a backup fuel for boiler. This activity has been included in the RKL-RPL document.

Based on the explanation above, it is known that the company has identified significant pollutants and implemented reduce and minimize action use while monitored the results of quality testing of certain parameters as listed in the RKL-RPL document.

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 procedure Number SOP / SMART / MCAR / IV / TA-PLB regarding Opening of New Land, entered into force on June 12, 2012. The document states that the purpose of this SOP is to prepare new land clearing for oil palm cultivation using the principle of no burn (zero burning) in accordance with agronomic techniques. The stages of the process of opening new land in the SOP are pioneering blocking, road building, drainage preparation, preparation of chemical system, preparation of ex-secondary mineral forest land (*imas*, uprooted, pile lane stakes, mechanical *perun*, chopping lane) and terracing construction (contour terracing, individual terracing) in a certain slope area.

Until the field observation activities carried out in 2022, the certification unit has not carried out any replanting or new development activities, as well as the replanting plan. Based on the results of the document review, it is known that until 2023 there is no plan for replanting activities in the scope of PT DSL certification. Based on the results of interviews with management, it is also stated that the company is committed not to carry out burning activities for land clearing.

7.11.2

The company has a policy regarding land clearing without burning under No:071/SMD OPS/IX/2007. Made on September 4, 2007 regarding the prohibition of land clearing without burning. Its contents include:

- Conducting patrols to prevent land fires in the estate area and its surroundings
- Prepare fire fighting teams and facilities according to the conditions of each employee at the location
- Assist the government in case of land fires around plantations and development areas
- Make a warning board or a fire hazard warning symbol and prohibition of burning land
- Efforts to improve coordination with related agencies to increase fire prevention
- Do not cultivate estates or clear land using fire techniques on purpose.

The company also has a SOP/SMART/MCAR/IV/TA-PLB land clearing procedure, in which the procedure describes the mechanism for land clearing without burning and paying attention to soil and water conservation principles such as making terraces, horse treads and planting ground cover nuts.

Until the audit carried out in 2021, the certification unit has not carried out any replanting or new development activities, nor has the replanting plan. Based on the results of interviews with management, it is also stated that the company is committed not to carry out burning activities for land clearing. The results of the field visit also showed that socialization regarding the prohibition of burning land had been conveyed through direct socialization to employees during morning apples and symbols posted in places that were easy for everyone to read. Field observations at the fire extinguisher storage location also show that the available tools are quite complete and in good condition, this is evidenced by the simulation of the water pump. The certification unit has also created a training program on the socialization of land clearing without burning to plasma farmers which has been included in the 2020-2021 and 2021-2022 training programs.

In carrying out fire prevention and control activities, the company has anticipated several ways, including:

- Identify potential levels of land fires and install fire hazard level monitoring boards at MKNE and MTWE that are easily seen by employees. The results of the identification of locations that have the potential for fire to occur are at 26 location points in PT DSL.

- Monitoring the level of fire susceptibility in all locations that have been identified every month which can be proven from the Report on Prevention and Management of Forest and Land Fires for the period 2021.
- Identification of monthly rainfall.
- Conduct regular socialization
- Monitoring hotspots through NASA and NOAA satellite imagery.
- Coordinate with the Regional Disaster Management Agency of Musi Rawas District and establish an internal emergency response organization.
- Simulation of emergency response for Earthquake, Housing and Land Fires conducted in June 2021 and scheduled to be carried out again in July 2022 in collaboration with Manggala Agni.
- Report of the Fire Management Unit and Land Fire Management Facilities and Infrastructure for Semester 2 of 2020, to the Plantation Service and the Environmental Service of Musi Rawas District on February 10, 2021.
- A list of KTD tools and monitoring documents for simple fire extinguishing equipment and equipment is available and up-to-date for the period of Semester 2, 2021
- There is a map of the location of fire prone areas, identification of the level of fire vulnerability and land fire patrols for the period of Semester 2, 2021.

7.11.3

The management unit routinely conducts socialization to employees for fire prevention and control activities. Some examples of activities that have been carried out include documentation in the form of minutes of socialization of prevention and control of land, estate and forest fires as a result of a collaboration between Manggala Agni and PT DSL on 11 July 2020 with 30 participants and on 17 July 2020 with 15 participants.

Based on the results of interviews with the management unit, it is stated that until now the company has appointed Karya Mukti Village as a Fire Care Community group in the company environment as per data dated April 23, 2020.

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 interviews and verification of planting year documents, it shows that all PT. DSL is from the planting year below November 2005. Disclosure of Liability for SMART, GAR, IMT membership was sent to RSPO via email on 29 August 2014. Based on the Zero Liability SMART, GAR, IMT HCV Assessment file, it is known that PT. DSL includes zero liability.

7.12.2

The company has identified protected areas in 2013 which is listed in the Identification & Analysis Report on the Existence of High Conservation Value Areas (HCV) PT Djuandasawit Lestari which was carried out by the Biodiversity & Conservation Section (Sustainability Division) SMART Team. The HCV Development Team is an Approved HCV Assessor by RSPO. The scope of identification is carried out for the units of Muara Kandis Estate, Muara Tawas Estate, and Pendawa Plasma with an area of ±14,000 Ha. Based on the identification report, the HCV area is 496.95 Ha. The distribution of the area is as follows:

Area Type	Unit	Area (Ha)
<i>Sempadan Sungai Petanang</i>	MTWE	166.11
<i>Sempadan Sungai Lakitan</i>	MTWE	95.79
<i>Sempadan Sungai Temani</i>	MKNE	86.24
<i>Sempadan Sungai Tawas</i>	MKNE	37.42
<i>Sempadan Sungai Aur</i>	PNDA	22.80
<i>Sempadan Sungai Bakul</i>	PNDA	39.67
<i>Hutan Lindung Bulian</i>	PNDA	48.92
TOTAL		496.95

The identified HCV areas included in the scope of certification are the HCV areas in the Muara Kandis Estate and Muara Tawas

Estate units with a total area of 385.56 Ha, of which the entire HCV area is included in the planted area. This is due to the identification of HCV areas after the company has planted oil palm. Based on the results of document verification, it is known that the company does not develop new land after 15 November 2018 so that the HCS assessment is not mandatory for the company.

Based on the results of field observations at the Petanang river border Block D57 Division 2 Muara Tawas estate and at the Temanai River Border Block J23 division 3 Muara Kandis Estate it is known that the area is protected by the company and there are no indications of traces of chemical application in the area. In addition, the map of the location of the HCV area is in accordance with the actual conditions, namely Block D57 Division 2 and Block J23 Division 3.

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 an HCV program for 2020-2022 based on the results of the evaluation of the realization of HCV management in the previous period. The HCV program will be evaluated annually. The plan contains a plan for management, monitoring, time management and the person in charge of implementation. The HCV management matrix describes the management plan consisting of:

- Boundary sign maintenance
- Direct socialization to employees and stakeholders around the plantation
- Maintenance of HCV warning boards
- Vertiver Grass Planting
- Maintenance of rehabilitation plants
- HCV security
- Management of endangered, threatened and/or protected species
- HCV monitoring.

The company has also conducted an annual review of HCV management which was carried out on January 3, 2021. This activity was carried out to analyze the opportunities and challenges of the identified potential HCVs in the hope that they will become 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 consider the wider landscape such as maintaining the presence of HCV (river border), anticipating land fires in the company area and in the area around the company, increasing employee and community knowledge by conducting socialization of HCV.

The company can show some implementation of the HCV management and monitoring plan for the period 2021 and 2022, for example:

- Monitoring of river border HCV areas from hunting disturbances, animal traps, illegal logging, chemical application for the period of December 2021. Based on monitoring results there is no disturbance in the river border HCV areas.
- Minutes of HCV socialization including the presence of important species were conducted on August 21, 2021 to 96 participants.
- Minutes of socialization of HCV and important species conducted on 26 April 2021 which was attended by 5 surrounding communities.
- Biodiversity Monitoring. The company can show a Biodiversity monitoring report for the April 2022 period. The report explains that during 2021 there will still be direct and indirect encounters with wild animals, such as the Sendang Lawe Stork and the White Stork.
- Maintenance of stakes and signboards. During 2022, maintenance of HCV signboards has been carried out at 6 points, for example at the Division Office, Blocks H23 and H18, Block C24, Block M14.

7.12.5

Verification of the planting year document shows that all PT. DSL is from the planting year under November 2005, so the company only conducts HCV assessments as required in Annex 5 of the RSPO. Based on the results of HCV identification, it is known that there is no area needed by the community to fulfill basic needs. In addition, based on interviews with communities around the company, it was found that the community no longer fulfilled their basic needs from the forest but from local markets. The livelihoods of the surrounding community include farming with rubber or oil palm plantations.

The company can also show the Minutes of the collective agreement on HCV management with Lubuk Pandan Village which was agreed on 11 July 2016 which explains that the company and the village community are to jointly maintain and conserve HCV in the company area. In addition, in the implementation of HCV management in 2021, the company also conducted interviews with communities around the plantations regarding HCV 5 & 6, for example on August 16, 2021, with the results of interviews that local communities did not use natural products to meet their daily needs.

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 in charge of managing HCV/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:

- Minutes of HCV socialization including the presence of important species were conducted on August 21, 2021 to 96 participants.
- Minutes of socialization of HCV and important species conducted on 26 April 2021 which was attended by 5 surrounding communities.

Based on interviews with harvesting and spraying officers at Muara Kandis Estate and Muara Tawas Estate, it is known that the company prohibits workers from keeping protected animals and plants and is prohibited from catching, hunting, and killing animals as well as prohibiting the destruction of HCV areas.

7.12.7

To avoid and prevent poaching and/or encroachment of HCV areas that have been determined by PT. DSL, several warning boards have been posted regarding the prohibition of hunting and encroachment. Routine monitoring of HCV areas is carried out by several personnel appointed by the company. The results of field observations also show that there are signs prohibiting the hunting of protected animals, burning, and marking the boundaries of conservation areas.

Monitoring of HCV areas in 2021 is carried out regularly every month to ensure the security of the area. Monitoring activities were carried out at several river border locations such as the Petanang, Lakit, Temani, Aur and Bakul rivers. This monitoring is carried out to see the progress of the results of HCV management from the initial stage to the current condition. Examples of monitoring carried out such as in December 2021 it was found that there were no threats to the HCV area such as poaching, former chemical applications, and the destruction of the HCV area. The results of field visits to several HCV areas show that the company has managed HCV areas such as not using chemicals, and putting up signs of HCV areas and prohibiting hunting.

The company also conducts annual monitoring and evaluation for the management of HCV areas where these activities are aimed at identifying risks and impacts on conservation areas and enhancing protection efforts. Some of the proposed activities based on the evaluation results include:

- Improve HCV management and monitoring activities in accordance with standard SOPs for HCV management and monitoring in all HCV areas within the plantation.
- Adjusted the poster for protected animals based on PermenLHK No.106/2018.
- Measurement of stem diameter on flora plots that have been made to monitor the dominance and density of Bulian Forest stands.
- Cooperating with the Bulian forest management team in its management in Pendawa Plasma such as joint patrols/monitoring, planting woody plant species and socializing to the surrounding community to protect the Bulian customary forest.
- Increase socialization activities to staff, plantation employees and the community around the plantation to increase the level of understanding of HCV.

7.12.8

Based on interviews and verification of planting year documents, it shows that all PT. DSL is from the planting year below November 2005. Disclosure of Liability for SMART, GAR, IMT membership was sent to RSPO via email on 29 August 2014. Based on the Zero Liability SMART, GAR, IMT HCV Assessment file, it is known that PT. DSL includes zero liability.

Status: Comply

3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and logo from Certification Body which submitted by Client	X or√
ASA-1.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product). PT SMART Tbk (Parent Company: Golden Agri Resources Ltd) Trademark License Number RSPO-1-0096-11-100-00	✓
	Status: Comply	
2.	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use	X or√
ASA-1.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product). PT SMART Tbk (Parent Company: Golden Agri Resources Ltd) Trademark License Number RSPO-1-0096-11-100-00	✓
	Status: Comply	
3.	Implementation of Certificate and Logo is not used on product	X or√
ASA-1.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product). PT SMART Tbk (Parent Company: Golden Agri Resources Ltd) Trademark License Number RSPO-1-0096-11-100-00	✓
	Status: Comply	
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or√
ASA-1.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product). PT SMART Tbk (Parent Company: Golden Agri Resources Ltd) Trademark License Number RSPO-1-0096-11-100-00	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

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

Golden Agri-Resources, Ltd Time Bound Plan (TBP) is explained in table 1.5. Golden Agri-Resources run forty-seven (47) mills and one hundred and thirty-six (166) estates (own and smallholders) in Indonesia and has achieved RSPO certified for thirty-one (31) mills and supply base in Indonesia. Golden Agri-Resources, Ltd has informed the TBP progress, MUTU has considered that Golden Agri-Resources, Ltd is comply with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Golden Agri-Resources, Ltd on 21 January 2021 made by Head of Sub Div SPO Certification and Low GHG Strategy.

MUTU has verified partial certification for uncertified unit's subsidiary of Golden Agri-Resources, Ltd based on their Time Bound Plan. There are sixteen (16) uncertified management unit of GAR. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There is no significant land conflicts which have not been declared above.
- The company has followed RSPO requirements regarding the New Planting Procedure and Remediation and Compensation Procedure.
- There is no labor disputes that are not resolved through an agreed process.
- All plantations established since 2005 have been carried out in accordance with applicable laws in the country and there is no evidence of non-compliance with the law in any of the non-certified holdings that have 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>Company Group/Holding Statement: The company has carried out a Compliance Audit / Internal Compliance Verification (ICV) to see compliance with RSPO standards and also the Set up System in the Company's units to be certified.</p> <p>There are Compliance Audit (ICV) reports for each company including:</p> <ol style="list-style-type: none"> 1. PT Sawitakarya Manunggul – Sawita Mill : Pre Audit 2015, Compliance Audit 24 - 31 May 2021 2. PT Smart Tbk – Bukit Kapur Mill: Pre Audit 2015, Compliance Audit 15 November 2021 3. PT Sinar Kencana Inti Perkasa – Kasuari Mill: Pre Audit 2015, Compliance Audit 11 October 2021 4. PT Agrolestari Mandiri – Pekawai Mill: Pre Audit 2015, Compliance Audit 01 March 2021 5. PT Binawit Abadi Pratama – Perdana Mill: 14 June 2021 6. PT Agrokarya Prima Lestari – Kuayan Mill: Pre Audit 2014, Compliance Audit 13 September 2021 7. PT Mitrakarya Agroindo – Tangar Mill: Pre Audit 2015, Compliance Audit 27 September 2021 8. PT Paramita Internusa Pratama – Belian Mill: Pre Audit 2015, Compliance Audit 28 June 2021 9. PT Kresna Duta Agroindo – Rantau Panjang Mill: Compliance Audit 01 November 2021 10. PT Kresna Duta Agroindo – Gunung Kombeng Mill: Compliance Audit 15 February 2021

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>11. PT Sawit Mas Sejahtera – Sungai Kikim Mill: <i>Setup System</i>. Compliance Audit 20 September 2021</p> <p>12. Sinar Kencana Inti Perkasa – Sungai Magalau Mill: Compliance Audit 25 October 2021.</p> <p>13. PT Bahana Karya Semesta – Sungai Air Jernih Mill: Compliance Audit 6 December 2021</p> <p>14. PT Bangun Nusa Mandiri – Kenari Mill: Compliance Audit 4 October 2021.</p> <p>15. PT Agrolestari Sentosa – Jalemo Mill: Compliance Audit 11 October 2021</p> <p>16. PT Adi Tunggal Mahajaya – Sako Mill: Compliance Audit 8 November 2021.</p> <p>17. Uncertified Area Sei Rindu Estate on 19 November 2021</p> <p>Auditor Verification: Internal Audit report available for uncertified management unit:</p> <ol style="list-style-type: none"> 1. PT Sawitakarya Manunggul (Sawita Mill and supply base) compliance audit on 24 - 31 May 2021. 2. PT SMART (Bukit Kapur Mill and supply base) compliance audit on 15 November 2021. 3. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base) compliance audit on 11 October 2021. 4. PT Agrolestari Mandiri (Pekawai Mill and supply base) compliance audit on 01 March 2021. 5. PT Binasawit Abadi Pratama (Perdana Mill and supply base) compliance audit on 14 June 2021. 6. PT Agrokarya Prima Lestari (Kuayan Mill and supply base) compliance audit on 13 September 2021. 7. PT Mitra Karya Agroindo (Tangar Mill and supply base) compliance audit on 27 September 2021. 8. PT Paramitra Internusa Pratama (Belian Mill and supply base) compliance audit on 28 June 2021. 9. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base) compliance audit on 01 November 2021. 10. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base) compliance audit on 15 February 2021. 11. PT Sawit Mas Sejahtera (Sungai Kikim and supply base) compliance audit on 20 September 2021. 12. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base) compliance audit on 25 October 2021. 13. PT Bahana Karya Semesta (Sungai Air Jernih Mill and supply base) compliance audit on 6 December 2021. 14. PT Bangun Nusa Mandiri (Kenari Mill and supply base) compliance audit on 4 October 2021. 15. PT Agro Lestari Sentosa (Jalemo Mill and supply base) compliance audit on 11 October 2021. 16. PT Adi Tunggal Mahajaya (Sako Mill and supply base) compliance audit on 8 November 2021. <p>Then there will be additional units in 2022 with the acquisition by GAR of 2 mills and 16 Estates (11 own estates and 5 estate plasma/KKPA).</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Internal audit activities have not yet been carried out, but prior to the acquisition of these units, GAR has carried out a due diligence or internal assessment so that it can be decided to be acquired by GAR and the internal audit plan to be carried out on these units can be shown, with details as follows:</p> <ol style="list-style-type: none"> 1. PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA with an internal audit plan on 17 May 2022. 2. PT Harapan Rimba Raya : Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA with an internal audit plan on 17 May 2022. 3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA with an internal audit plan on 17 May 2022. 4. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be the supply base of Bukit Perak Mill (PT Bumi Permai Lestari) that has been certified with an internal audit plan on 28 March 2022. 5. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be the supply base of Bukit Perak Mill (PT Bumi Permai Lestari) that has been certified with an internal audit plan on 28 March 2022. 6. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be the supply base of Bumipalma Mill (PT Bumipalma LestariPersada) that has been certified with an internal audit plan on 8 August 2022. 7. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be the supply base of Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa) with an internal audit plan on 7 November 2022. <p><i>Notes:</i> Verification of the realization of the internal audit carried out on the newly acquired units will be carried out at the nearest RSPO surveillance audit activity with the internal audit schedule that has been set.</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 7.12	<p>Company Group/Holding Statement: Several companies under GAR were planted above November 2005, while the HCV assessment process was conducted in the period 2010 – 2013.</p> <p>GAR and its subsidiaries carried out a Remediation and Compensation (RaCP) procedure beginning with Disclosure and Zero Liability reporting to the RSPO via email on 29 August 2014.</p> <p>From 25 companies, 7 of them are certified units, the remaining 18 companies are uncertified units. The following is an update on the RaCP progress as of 11 January 2022 for uncertified units:</p> <ol style="list-style-type: none"> a) 4 companies have received Concept Note approval from RSPO dated 27 July 2020, namely: <ol style="list-style-type: none"> 1. PT Kencana Graha Permai (Delima Estate) – Kalimantan Barat

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>2. PT Agrolestari Sentosa – Kalimantan Tengah</p> <p>3. PT Sumber Indah Perkasa – Papua</p> <p>4. PT Kresna Duta Agroindo – Kalimantan Timur</p> <p>The company submitted a new Concept Note in collaboration with a third party (PT Lestari Capital). Concept Note Batch 1 includes companies:</p> <p>1. PT Kencana Graha Permai (Delima Estate) – Kalimantan Barat</p> <p>2. PT Sumber Indah Perkasa – Papua</p> <p>3. PT Kresna Duta Agroindo – Kalimantan Timur</p> <p>The latest progress on the revised Concept Note was submitted on 14 January 2022 and is currently still being reviewed by the RSPO Compensation Panel.</p> <p>The company also made the Concept Note Project Batu Menangis for PT Agrolestari Sentosa – Kalimantan Tengah, was submitted on 16 December 2021 to RSPO Compensation Panel.</p> <p>b) The LUCA (Land Use Change Analysis) report which is still in the RSPO review process:</p> <p>1. PT Kartika Prima Cipta – Kalimantan Barat</p> <p>2. PT Agrolestari Mandiri – Kalimantan Barat</p> <p>c) The LUCA (Land Use Change Analysis) report is in the process of being revised and will be sent to the RSPO:</p> <p>1. PT Cahaya Nusa Gemilang – Kalimantan Barat</p> <p>2. PT Paramitra Internusa Pratama – Kalimantan Barat</p> <p>3. PT Bangun Nusa Mandiri – Kalimantan Barat</p> <p>4. PT Persada Graha Mandiri – Kalimantan Barat</p> <p>5. PT Satya Kisma Usaha (Medan Sari Estate) – Kalimantan Tengah</p> <p>6. PT Binasawit Abadi Pratama – Kalimantan Tengah</p> <p>7. PT Aditunggal Mahajaya – Kalimantan Tengah</p> <p>8. PT Mitrakarya Agroindo – Kalimantan Tengah</p> <p>9. PT Agrokarya Primalestari – Kalimantan Tengah</p> <p>10. PT Buana Adhitama – Kalimantan Tengah</p> <p>11. PT Sinar Kencana Inti Perkasa – Kalimantan Selatan</p> <p>12. PT Sawita Karya Manunggul – Kalimantan Selatan</p> <p>d) The LUCA (Land Use Change Analysis) report has been approved is PT Satya Kisma Usaha (Batang Gading Estate) – Jambi.</p> <p>The LUCA report proposed to be hold/postponed until the Integrated HCV HCS Report obtains Satisfactory status from the HCVRN, is PT Sawit Mas Sejahtera – Sumatera Selatan (2 reports).</p> <p>HCV assessments for 17 reports was conducted in the period of 2010 to 2018 by external (consultant) and internal parties. The HCV assessment is carried out by a team assessor with a Team Leader who has been approved by the RSPO. The reference for the HCV</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>assessment using the HCV Toolkit 2008. The peer review is carried out by an independent consultant who has also been approved by the RSPO.</p> <p>Assessment of PT Sawit Mas Sejahtera – Sumatera Selatan has used Integrated HCV-HCS with the consultants who have been licensed in HCVN and HCSA</p> <p>The company continues to follow up on the RaCP process, so that the RSPO timebound for uncertified units can be realized immediately.</p> <p>In the 2021 period, several companies were acquired by GAR according to the notarial deed of amendment dated 04 August 2021, including:</p> <ol style="list-style-type: none"> 1. PT Kruing Lestari Jaya 2. PT Harapan Rimba Raya 3. PT Rimbaraya Tamajaya 4. PT Agrolestari Subur Sejahtera 5. PT Agrolestari Hijau Sentosa 6. PT Kharisma Riau Sentosa Prima 7. PT Mitranusa Permata <p>The company is still collecting information and documentation regarding the fulfillment of RaCP obligations for the newly acquired company. The timeline that has been prepared for the fulfillment of this RaCP is:</p> <ul style="list-style-type: none"> • Submission of Disclosure and LUCA on semester 1 of 2022 • Submission of Concept Notes on Semester 2 of 2022 • Approval RaCP Proposal on Semester 1 of 2023 <p>For the RaCP process, smallholders scheme will be adjusted to the 2023 timebound along with the new acquisition company.</p> <p>Auditor Verification:</p> <p>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. Detail information of uncertified unit are:</p> <ol style="list-style-type: none"> 1. PT Kencana Graha Permai - Kalimantan Barat (Delima Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted a new Concept Note in collaboration with PT Lestari Capital on 14 January 2022, and is currently still being reviewed by the RSPO Compensation Panel. 2. PT Agrolestari Sentosa – Kalimantan Tengah (Jalemo Estate, Manuhing Estate, Kajui Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted the Concept Note Project Batu Menangis on 14 January 2022 and is currently still being reviewed by the RSPO Compensation Panel. 3. PT Sumber Indah Perkasa – Papua (Mambruk Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted a new Concept Note in collaboration with PT

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Lestari Capital on 14 January 2022, and is currently still being reviewed by the RSPO Compensation Panel.</p> <ol style="list-style-type: none"> 4. PT Kresna Duta Agroindo – Kalimantan Timur (Gunung Kombeng Mill, Rantau Panjang Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted a new Concept Note in collaboration with PT Lestari Capital on 14 January 2022, and is currently still being reviewed by the RSPO Compensation Panel 5. PT Kartika Prima Cipta – Kalimantan Barat (Muara Tawang Estate), the LUCA report which is still in the RSPO review process. 6. PT Agrolestari Mandiri – Kalimantan Barat (Pekawai Mill and supply bases), the LUCA report which is still in the RSPO review process. 7. PT Cahaya Nusa Gemilang – Kalimantan Barat (Kenanga Estate), LUCA report is in the process of being revised and will be sent to the RSPO. 8. PT Paramitra Internusa Pratama – Kalimantan Barat (Belian Mill, Belian Estate and Tengawang Estate), LUCA report is in the process of being revised and will be sent to the RSPO. 9. PT Bangun Nusa Mandiri – Kalimantan Barat (Kenari Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO. 10. PT Persada Graha Mandiri – Kalimantan Barat (Kapuas Hulu Estate and Sungai Beran Estate), LUCA report is in the process of being revised and will be sent to the RSPO. 11. PT Satya Kisma Usaha – Kalimantan Tengah (Medan Sari Estate), LUCA report is in the process of being revised and will be sent to the RSPO. 12. PT Binasawit Abadi Pratama – Kalimantan Tengah (Perdana Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO. 13. PT Aditunggal Mahajaya – Kalimantan Tengah (Sungai Ayawan Estate), LUCA report is in the process of being revised and will be sent to the RSPO. 14. PT Mitrakarya Agroindo – Kalimantan Tengah (Tangar Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO. 15. PT Agrokarya Primalestari – Kalimantan Tengah (Kuayan Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO. 16. PT Buana Adhitama – Kalimantan Tengah (Sa'iri Estate and Bukit Dua Estate), LUCA report is in the process of being revised and will be sent to the RSPO. 17. PT Sinar Kencana Inti Perkasa – Kalimantan Selatan (Sungai Magalau Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO. 18. PT Sawita Karya Manunggul – Kalimantan Selatan (Sawita Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO 19. PT Satya Kisma Usaha – Jambi (Batang Gading Estate), the LUCA report has been approved in 12 November 2021.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>20. PT Sawit Mas Sejahtera – Sumatera Selatan, the LUCA report proposed to be hold/postponed until the Integrated HCV HCS Report obtains Satisfactory status from the HCVRN.</p> <p>21. The companies were acquired by GAR on 2021 are PT Kruing Lestari Jaya (Sungai Perak Mill and supply bases), PT Harapan Rimba Raya (Sungai Kedang Mill and supply bases), PT Rimbaraya Tamajaya (Sungai Pahu Estate), PT Agrolestari Subur Sejahtera (Bukit Permai Estate), PT Agrolestari Hijau Sentosa (Bukit Lestari Estate), PT Kharisma Riau Sentosa Prima (Kharisma Estate), PT Mitranusa Permata (Sungai Manunggul Estate). The company is still collecting information and documentation regarding the fulfillment of RaCP obligations.</p> <p>22. The uncertified area of Sei Rindu Estate covering 203.89 Ha located in the Location Permits of PT Tapan Nadenggan with planting period on 2006</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement: GAR and its subsidiaries planted after January 2010. There are companies that had conducted the RSPO New Planting Procedure (NPP) and have gone through a 30-day public consultation process in April 2014. These companies include:</p> <ol style="list-style-type: none"> 1. PT Satya Kisma Usaha – Jambi 2. PT Kresna Duta Agroindo – Kalimantan Timur 3. PT Mitra Karya Agroindo – Kalimantan Tengah 4. PT Binasawit Abadipratama – Kalimantan Tengah 5. PT Aditunggal Mahajaya – Kalimantan Tengah 6. PT Agrolestari Sentosa – Kalimantan Tengah 7. PT Agrokarya Primalestari – Kalimantan Tengah 8. PT Buana Adhitama – Kalimantan Tengah 9. PT Agrolestari Mandiri – Kalimantan Barat 10. PT Paramitra Internusa Persada – Kalimantan Barat 11. PT Persada Graha Mandiri – Kalimantan Barat 12. PT Bangun Nusa Mandiri – Kalimantan Barat 13. PT Kartika Prima Cipta – Kalimantan Barat 14. PT Kencana Graha Permai – Kalimantan Barat 15. PT Cahaya Nusagemilang – Kalimantan Barat <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. Detail information of uncertified unit are:</p> <ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base): there is no new land clearing after January 2010 2. PT Agrolestari Mandiri (Pekawai Mill and supply base): NPP on 26 April 2014 3. PT Binasawit Abadi Pratama (Perdana Mill and supply base): NPP on 8 July 2014 4. PT Agrokarya Prima Lestari (Kuayan Mill and supply base): NPP on 26 April 2014 and PT Buana Adhitama (supply base) conduct NPP on 4 June 2014.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ol style="list-style-type: none"> 5. PT Mitra Karya Agroindo (Tangar Mill and supply base): NPP on 26 April 2014 6. PT Paramitra Internusa Pratama (Belian Mill and supply base): NPP on 3 June 2014, PT Kartika Prima Cipta (supply base) conduct NPP on 8 July 2014 and PT Persada Graha Mandiri (Supply base) conduct NPP on 6 June 2014. 7. PT Sawit Mas Sejahtera (Sungai Kikim and supply base): there is new planting after January 2010 in Sungai Kikim Estate and Sungai Saling Estate, the company not conduct NPP. This is become subject of sanction. For PT Buana Sawit Mas (supply base) conduct NPP on 8 July 2014. 8. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base): there is no new land clearing after January 2010. 9. PT Agro Lestari Sentosa (Jalemo Mill and supply base): NPP on 26 April 2014 10. PT Adi Tunggal Mahajaya (Sako Mill) (under construction): NPP on 25 April 2014, PT Agrokarya Prima Lestari (supply base) conduct NPP on 26 April 2014 and PT Mitra Karya Agroindo (supply base) conduct NPP on 26 April 2014. 11. PT SMART (Bukit Kapur Mill and supply base): there is no new land clearing after January 2010. 12. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base): NPP on 8 July 2014. 13. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base): NPP on 8 July 2014. 14. PT Sawitakarya Manunggul (Sawita Mill and supply base): there is new land clearing after January 2010 in Sawita KKPA and company not conduct NPP. This is become subject of sanction. 15. The uncertified area of Sei Rindu Estate covering 203.89 Ha located in the Location Permits of PT Tapan Nadenggan with planting period on 2006
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 P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8	<p>Company Group/Holding Statement: No land conflicts. The company has a land conflict resolution mechanism in accordance with the RSPO criteria 4.2, 4.6, 4.7 and 4.8. This procedure is contained in the SOP for handling social conflicts with the registration number SOP/SMART/SCRD/NSDV//002 revision 1 dated 18 May 2016 and SOP for Handling Complaints and Dissatisfaction no SOP/SMART/GIMSSCMD/USDV//001 revision 2 dated April 11, 2017. This procedure regulates mutually agreed upon social conflict resolution. Conflict resolution can be done in a participatory manner and can also be done with a third party (mediator).</p> <p>The company also has a procedure for handling complaints before they develop into conflict. The process in question is SOP/SMART/GIMS-SCMD/USDV//001 revision 2 dated 11 April 2017, handling complaints appropriately and quickly. GAR has initiated to become a member of the RSPO DSF as a "Grower" category.</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Here recap of complaint progress related to GAR which publish in RSPO Website:</p> <ol style="list-style-type: none"> 1. Complaint dated July 11, 2021 to PT SMART Tbk (West Kalimantan Region) regarding the alleged purchase/supply of fresh fruit bunches (FFB) and crude palm oil (CPO) from PT Kapuasindo Palm Industri (PT KPI), a subsidiary of the Kencana Group (not members of the RSPO), who have committed a series of violations against workers and indigenous peoples in the district. Last Status RSPO Complaints Panel has issued a decision letter regarding the complaint on 17 January 2022 in which it was decided to terminate the entire complaint. The decision letter has been submitted to both parties, and time is given if anyone wishes to appeal until April 11, 2022. (RSPO Complaint Panel Decision is attached). 2. Complaint on 2 March 2020 to GAR (Central Kalimantan Region) from Forest Peoples Program & Elk Hills Research regarding alleged land legality and bribery cases. On the part of GAR itself, GIS-2 analysis for land clearance alerts after November 2014 from discussions with RSPO GIS manager on 21 May 2021 has agreed on the sampling method. GAR's clarification report was sent on September 8, 2021. As for the legal review on anti-bribery policies & practices, the company rejected the ToR for Legal Review on March 26, 2021. Until now the company is still waiting for a further decision from the RSPO. The latest status is as of December 15, 2021, the RSPO is waiting for the results of a review from the consultant. 3. Complaint on 19 October 2018 to GAR (Kapas Hulu Region, West Kalimantan) from the Forest Peoples Program (FPP) & Transformasi Untuk Keadilan – Indonesia (TUK-I) regarding legality. On 26 August 2021, the RSPO Complaint Panel decided to proceed with further investigations. The investigation carried out will be fully funded by the RSPO, and carried out by PROFUNDO Parties. Until now the company is still waiting for a further decision from the RSPO. The latest status is as of December 6, 2021, the RSPO is waiting for the results of a review from the consultant. 4. Complaint on 13 October 2014 to PT Kartika Prima Cipta (West Kalimantan) from Forest Peoples Program (FPP) & Transformasi Untuk Keadilan – Indonesia (TUK-I) regarding the FPIC process and 6 other issues. RSPO with the approval of GAR and FPP divides the conflict resolution verification process into 5 phases (phase 1 related to NPP, maximum land holding and new land development, phase 2 related to legality, phase 3 related to smallholders, phase 4 related to FPIC and phase 5 related to HCV), where GAR has responded to phase 5 on 26 August 2021. The information submitted has responded to all stages and GAR is currently waiting for a decision from the RSPO Complaint Panel. The latest status as of 15 December 2021, the RSPO Complaint Panel has reached a decision for phase 2 and is awaiting discussion of phases 3 and 4.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>5. The results of the Compliance Audit conducted for the 2021 period in the uncertified unit that there was no land conflict and the unit had disseminated the SOP for Handling Complaints and Dissatisfaction, Human Rights Policy and SOP for Handling Social Conflicts both internally and externally, in general the FPIC process has been carried out according to procedures, so that there are no land or social conflicts.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There is no land conflicts in the following uncertified management unit:</p> <ol style="list-style-type: none"> 1. PT Sawitakarya Manunggul (Sawita Mill and supply base) 2. PT SMART (Bukit Kapur Mill and supply base) 3. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base) 4. PT Agrolestari Mandiri (Pekawai Mill and supply base) 5. PT Binasawit Abadi Pratama (Perdana Mill and supply base) 6. PT Agrokarya Prima Lestari (Kuayan Mill and supply base) 7. PT Mitra Karya Agroindo (Tangar Mill and supply base). 8. PT Paramitra Internusa Pratama (Belian Mill and supply base) 9. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base). 10. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base). 11. PT Sawit Mas Sejahtera (Sungai Kikim and supply base) 12. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base) 13. PT Bahana Karya Semesta (Sungai Air Jernih Mill and supply base) 14. PT Bangun Nusa Mandiri (Kenari Mill and supply base) 15. PT Agro Lestari Sentosa (Jalemo Mill and supply base) 16. PT Adi Tunggal Mahajaya (Sako Mill and supply base) 17. PT Kruing Lestari Jaya (Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA) 18. PT Harapan Rimba Raya (Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA). 19. PT Rimbaraya Tamajaya (Sungai Pahu Estate and Sungai Pahu KKPA), which will be supply base for Sungai Kedang Mill. 20. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be the supply base of Bukit Perak Mill that has been certified 21. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be the supply base of Bukit Perak Mill that has been certified 22. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be the supply base of Bumipalma Mill that has been certified 23. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be the supply base of Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa).

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		Based on the auditor's search through news from the internet, no information on land conflicts was found in the above uncertified management unit. However, on the RSPO website (Complaint Panel) there is information about complaints from various stakeholders against GAR and this has been explained by the company regarding the progress of the settlement as described above.
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 4.2	<p>Company Group/Holding Statement: The company has a procedure for handling employee complaints before becoming into conflicts. The procedure is SOP/SMART/SCRD/NSDV/I/002 revision 1 dated 18 May 2016.</p> <p>Procedures related to employee complaints are regulated in the internal flow of form because employees are included in the category of internal stakeholders. The media of complaint used is an official letter submitted through the worker union or put in the suggestion box provided in strategic locations.</p> <p>During 2021, there were no new complaints regarding employment through the RSPO website, as for the progress of previous complaints, they have closed status.</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> <p>There is no list of employee and stakeholder complaint and grievance.</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	<p>Company Group/Holding Statement: Companies comply with the regulations in accordance with the requirements of the RSPO 2.1 where there is no violation of the rules that are relevant to the plantation. The company has a mechanism to evaluate compliance with regulations, namely SOP/SMART/UMUM/SADV/I/002. In SOP describes procedures for compliance, completeness and groove sections which explain in detail to evaluate compliance with the legislation.</p> <p>Subsidiaries of GAR which still on going to process HGU consist of:</p> <ol style="list-style-type: none"> 1. PT Djuandasawit Lestari (Muara Kandis Estate & Muara Tawas Estate) 2. PT Sawit Mas Sejahtera (Sawit Mas Estate) 3. PT Bumi Sawit Permai (Bumi Sawit Estate) 4. PT Forestralestari Dwikarya (Tanjung Rusa Estate) 5. PT Sumber Indah Perkasa (Sungai Buaya Estate, Sungai Merah Estate) 6. PT Ivo Mas Tunggal (Samsam Estate, Ujung Tanjung Estate, Sei Rokan Estate, Nenggala Estate) 7. PT Buana Wiralestari Mas (Kijang Estate, Nagamas Estate, Nagasakti Estate) 8. PT Ramajaya Pramukti (Ramarama Estate) 9. PT Binasawit Abadipratama (Perdana Estate, Lenggana Estate, Semandau Estate, Muara Dua Estate)

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ol style="list-style-type: none"> 10. PT Agrokarya Prima Lestari (Muara Tawang Estate, Kuayan Estate, Bukit Sentuhai Estate, Tajur Beras Estate, Seranau Estate) 11. PT Buana Adhitama (Sapiri Estate) 12. PT Agrolestari Sentosa (Manuhing Estate, Kajui Estate) 13. PT Mitra Karya Agroindo (Sungai Nusa Estate) 14. PT Aditunggal Mahajaya (Sungai Ayawan Estate) 15. PT Satya Kisma Usaha (Medang Sari Estate) 16. PT Buana Adhitama (Bukit Dua Estate) 17. PT Agrolestari Sentosa (Jalemo Estate) 18. PT Binasawit Abadipratama (Perdana Mill) 19. PT Agrokarya Prima Lestari (Kuayan Mill) 20. PT Mitrakarya Agroindo (Tangar Mill) 21. PT Agrolestari Sentosa (Jalemo Mill) 22. PT Adi Tunggal Mahajaya (Sako Mill) 23. PT Smart Tbk. (Sungai Cantung Estate, Bukit Kapur Estate, Bukit Kapur Mill) 24. PT Bangun Nusa Mandiri (Gaharu Estate, Kenari Estate, Kenari Plasma, Gahari Plasma, Kenari Plasma) 25. PT Tapan Nadenggan (Sei Rindu Estate) <p>Beside that, there are some unit still on process the land certificate (SHM) consist of:</p> <ol style="list-style-type: none"> 1. PT Kresna Duta Agroindo – Gunung Kombeng Mill (Gunung Kombeng Plasma) 2. PT Ramajaya Pramukti (Ramarama Plasma) 3. PT Satya Kisma Usaha – Sungai Bengkal Mill (Kilis Plasma) 4. PT Agrokarya Prima Lestari (Sungai Sambon Plasma) 5. PT Djundasawit Lestari (Pandawa Plasma) 6. PT Foresta Lestari Dwikarya (Tanjung Rusa Plasma) 7. PT Palmino Biliton Berjaya (Tanjung Sawit Plasma) 8. PT Sinar Kencana Inti Perkasa (Sungai Kupang Plasma) 9. PT Sawitakarya Manunggul (Sawita Plasma) 10. PT Kresna Duta Agroindo (Jakluay Plasma, Bukit Subur Plasma) 11. PT Kresna Duta Agroindo (Rantau Panjang Plasma) 12. PT Kencana Graha Permai (Kayung Plasma, Kencana Plasma, Kenanga Plasma) 13. PT Paramitra Internusa Pratama (Belian Plasma) 14. PT Paramitra Internusa Pratama (Muara Tawang KKPA) 15. PT Paramitra Internusa Pratama (Kapuas Hulu KKPA) 16. PT Mitrakarya Agroindo (Sulin Plasma) 17. PT Agrokarya Prima Lestari (Sapiri Plasma) 18. PT Adi Tunggal Mahajaya (Sako Plasma) 19. PT Kresna Duta Agroindo – Pelakar Mill (Tiga Serumpun Plasma) 20. PT Kresna Duta Agroindo – Langling Mill (Batang Gading Plasma) <p>There are 4 companies which still on process to revise EIA document and temporary storage place for hazardous and toxic waste, consist of:</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa (Kasuari Mill, Cendrawasih Estate, Nuri Estate, Rajawali Estate) 2. PT Sumber Indah Perkasa (Mambruk Estate) 3. PT Sawit Mas Sejahtera (Sungai Kikim Mill, Sungai Kikim Estate, Sungai Pangi Estate, Sungai Musi Estate, Sungai Saling Estate) 4. PT Bumi Sawit Permai (Sungai Enim Estate, Sungai Lematang Estate) <p>In the 2021 period, several companies were acquired by GAR according to the notarial deed of amendment dated August 4, 2021, including:</p> <ol style="list-style-type: none"> 1. PT Kruing Lestari Jaya 2. PT Harapan Rimba Raya 3. PT Rimbaraya Tamajaya 4. PT Agrolestari Subur Sejahtera 5. PT Agrolestari Hijau Sentosa 6. PT Kharisma Riau Sentosa Prima 7. PT Mitranusa Permata <p>The company is still collecting information and documentation related to compliance with legal documents such as HGU, Environmental Documents and SHM (for plasma).</p> <p>Auditor Verification: Legal process is still going on and there is a detail update progress documented by the company for each year.</p> <ul style="list-style-type: none"> - PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base), there is a legal non-compliance. Supply base for Kasuari Mill are PT Sinar Kencana Inti Perkasa and PT Sumber Indah Perkasa. The legal non compliance which still on process is EIA revision in PT Sumber Indah Perkasa and Hazardous waste permit in PT Sinar Kencana Inti Perkasa. - PT Binawit Abadi Pratama (Perdana Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Agrokarya Prima Lestari (Kuayan Mill and supply base, doesn't have land use title (HGU), the HGU is still on process. Supply base for Kuayan Mill are PT Agrokarya Prima Lestari and PT Buana Adhitama. - PT Mitrakarya Agroindo (Tangar Mill and supply base, doesn't have land use title (HGU), the HGU is still on process. - PT Sawit Mas Sejahtera (Sungai Kikim Mill and supply base), there is a legal non-compliance. Supply base for Sungai Kikim Mill are PT Sawit Mas Sejahtera and PT Bumi Sawit Permai. The legal non compliance which still on process is EIA revision. - PT Agrolestari Sentosa (Jalemo Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Adi Tunggal Mahajaya (Sako Mill and supply base), there is a legal non-compliance. Supply base for Sako Mill are PT Adi Tunggal Mahajaya, PT Mitra Karya Agroindo and PT Agrokarya Prima Lestari. The legal non compliance which still on process is Land Use Title (HGU).

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> - PT SMART Tbk (Bukit Kapur Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base, doesn't have land use title (SHM), the SHM is still on process. Supply base for Gunung Kombeng Mill is communities plantation. - PT Bangun Nusa Mandiri (Kenari Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Djuandasawit Lestari: there is an area is still in process for HGU in Muara Wahau Estate (574.58 Ha) - PT Satya Kisma Usaha – Kalimantan Tengah: there is an area is still in process for HGU in Medang Sari Estate (24,41 Ha) - PT Sawit Mas Sejahtera: there is an area is still in process for HGU in Sawit Mas Sejahtera Estate (2,291 Ha) - PT Bumi Sawit Mas: there is an area is still in process for HGU in Bumi Sawit Mas Estate (773 Ha) - PT Sumber Indah Perkasa: there is an area is still in process for HGU in Sungai Buaya Estate (155.46 Ha) and Sungai Merah Estate (241.54 Ha) - PT Ivomas Tunggal: there is an area still in process for HGU Samsam Estate (29.09 Ha), Kandista Estate (158.46 Ha), Nenggala Estate (419.9 Ha), Sei Rokan Estate (102.7 Ha), Ujung Tanjung Estate (557.3 Ha) - PT Buana Wiralestari Mas: there is area is still in process for HGU Naga Mas Estate (253.39 Ha), Naga Sakti Estate (59.79 Ha), Kijang Mas Estate (56.07 Ha) - PT Ramajaya Pramukti: there is an area still in process for HGU Rama Rama Estate (318.76 Ha) - PT Bumipalma LestariPersada: there is an area still in process for HGU Bumi Palma Estate (39.21 Ha) - PT Tapian Nadenggan (Sei Rindu Estate: there is an area still in process for HGU covering 203.89 Ha, the area located in production forest while the latest updated, the company has been principle permits based on decree from ministry of environment and forestry No S.566/Menlhk/Setjen/PLA.2/8/2019 dated 19 August 2019 regarding principal permits exchange of Forest areas for palm oil plantation on behalf of PT Tapian Nadenggan, consist of limited production forest areas (<i>Hutan Produksi Terbatas/HPT</i>) covering \pm 8.191 Ha - <p>Then there will be additional units in 2022 with the acquisition by GAR of 2 mills and 16 Estates (11 own estates and 5 estate plasma/KKPA). Internal audit activities have not yet been carried out, but prior to the acquisition of these units, GAR has carried out a due diligence or internal assessment so that it can be decided to be acquired by GAR, with details as follows:</p> <ol style="list-style-type: none"> 1. PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ol style="list-style-type: none"> 2. PT Harapan Rimba Raya : Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA. 3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA which will be supply base for Sungai Kedang Mill (PT Harapan Rimba Raya). 4. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified. 5. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified. 6. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be supply base for Bumipalma Mill (PT Bumipalma Lestari Persada) which has been certified. 7. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be supply base for Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa). <p>The acquisition company already has legality in the form of HGU, but other legalities such as environmental documents and other permits are being collected and will be completed when an internal audit of the acquisition units is carried out.</p> <p>There are 4 companies which still on process to revise EIA document and temporary storage place for hazardous and toxic waste, consist of:</p> <ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa (Kasuari Mill, Cendrawasih Estate, Nuri Estate, Rajawali Estate) 2. PT Sumber Indah Perkasa (Mambruk Estate) 3. PT Sawit Mas Sejahtera (Sungai Kikim Mill, Sungai Kikim Estate, Sungai Pangi Estate, Sungai Musi Estate, Sungai Saling Estate) 4. PT Bumi Sawit Permai (Sungai Enim Estate, Sungai Lematang Estate) <p>There are some unit still on process the land certificate (SHM) consist of:</p> <ol style="list-style-type: none"> 1. PT Kresna Duta Agroindo – Gunung Kombeng Mill (Gunung Kombeng Plasma) 2. PT Ramajaya Pramukti (Ramarama Plasma) 3. PT Satya Kisma Usaha – Sungai Bengkal Mill (Kilis Plasma) 4. PT Agrokarya Prima Lestari (Sungai Sambon Plasma) 5. PT Djundasawit Lestari (Pandawa Plasma) 6. PT Foresta Lestari Dwikarya (Tanjung Rusa Plasma) 7. PT Palmindo Biliton Berjaya (Tanjung Sawit Plasma) 8. PT Sinar Kencana Inti Perkasa (Sungai Kupang Plasma) 9. PT Sawitakarya Manunggul (Sawita Plasma) 10. PT Kresna Duta Agroindo (Jakluay Plasma, Bukit Subur Plasma) 11. PT Kresna Duta Agroindo (Rantau Panjang Plasma) 12. PT Kencana Graha Permai (Kayung Plasma, Kencana Plasma, Kenanga Plasma)

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>13. PT Paramitra Internusa Pratama (Belian Plasma)</p> <p>14. PT Paramitra Internusa Pratama (Muara Tawang KKPA)</p> <p>15. PT Paramitra Internusa Pratama (Kapuas Hulu KKPA)</p> <p>16. PT Mitrakarya Agroindo (Sulin Plasma)</p> <p>17. PT Agrokarya Prima Lestari (Sapiri Plasma)</p> <p>18. PT Adi Tunggal Mahajaya (Sako Plasma)</p> <p>19. PT Kresna Duta Agroindo – Pelakar Mill (Tiga Serumpun Plasma)</p> <p>20. PT Kresna Duta Agroindo – Langling Mill (Batang Gading Plasma)</p> <p>Based on auditor verification, there is still progress in obtaining legality documents for the uncertified units so that GAR has included the certification plan for the uncertified units in the timebound plan.</p>

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

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 Non-conformity at Surveillance 1.1 Assessment

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. Opportunity for Improvement at Surveillance 1.1 Assessment

No	Ref. Std.	Description
-	-	-

3.4.4. Noteworthy Positive Components at Surveillance 1.1 Assessment

No	Description
1	The company's commitment to implementing a sustainable palm oil management system.
2	Good cooperation with the companion team
3	Has realized a partnership garden (plasma) with the surrounding community
4	Do not use herbicides with the active ingredient paraquat.
5	Has achieved PROPER with blue category periode tahun 2021

3.4 Summary of Arising Issues from Public and Auditor Verification

Public Issues	Auditor Verification
Land Office of Musi Rawas District <ul style="list-style-type: none"> There are no land disputes in the company There is no overlapping of licenses with other permits Has routinely reported the use of HGU Communication with Land Office is quite good 	<p>There are no negative issues that need further verification.</p>
Contractor of FFB transport – PT Satrindo Jaya Agrindo <ul style="list-style-type: none"> All clauses in the contract contain all information related to obligations and rights, payment systems, correspondence, mechanisms for submitting information and complaints, certain provisions such as force majeure, and other important information. The entire content of the contract has been understood by both parties and has been implemented properly. During the period of the work agreement, there are no obstacles in the delivery of information, and the execution of work from the second party, as well as the payment of the second party Has 44 units of FFB transporting trucks with a workforce of 20 people PPE used by workers is safety shoes and safety helmets provided by contractors. The contractor has registered workers in BPJS Health and employment, and paid wages according to the UMK Have an integrity pact that contains, among others, not committing corruption and bribery, complying with business ethics, respecting human rights, not employing workers under the age of 18, non-discriminatory, not performing forced labor, complying with K3 regulations, environment, licensing, legality, and employment 	<p>There are no negative issues that need further verification.</p>
Villages around the Company Interviewees: <ol style="list-style-type: none"> Petrans Jaya Village (Village Head) Lubuk Pandan Village (Village Head) Karya Mukti Village <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 	<p>There are no negative issues from the village community around the company.</p>

Public Issues	Auditor Verification
<p>form of CSR or direct assistance.</p> <ul style="list-style-type: none"> Communication between the village and the company is not a problem and the company always responds to requests from the village. 	
<p>2 previous land owners who have been compensated from Lubuk Pandan Village.</p> <ul style="list-style-type: none"> Compensation has been carried out with the consent of 2 parties and without any coercion from any party The cost of compensation or compensation has been paid in full by the company at a mutually agreed price with complete documentation and is held by each party. So far, no problems have arisen regarding land compensation. Communication with the company is not a problem and the company always responds to requests from the village or previous land owners. 	<p>There are no negative issues from previous land owners who have been compensated.</p>
<p>Gender Committee of Muara Kandis Mill, Muara Kandis Estate, and Muara Tawas Estate</p> <p>The Gender Committee still active in every unit. Gender Committee activities include socialization of sexual harassment, complaints, general health and so on. There are no issues related to sexual harassment.</p> <p>Female workers have the right to get menstruation leave (H1), maternity leave (H2) and has been given freedom to breastfeed their child while working for half an hour. There is no discrimination of gender such as related in promotion.</p> <p>There also male workers as member of the Gender Committee in POM and every estate.</p>	<p>There are no negative issues that need further verification.</p>
<p>Environmental Agency of Muara Rawas District</p> <ul style="list-style-type: none"> The company has obtained social environment impact assessment. There is no additional scope during last year. The company has reported environment monitoring & management plan implementation. The company has effluent discharge license The company has hazardous waste store license There are no open burning issues. The company had obtained <i>PROPER</i> certificate from minister of Environment and Forestry with a Blue category. 	<p>There are no negative issues that need further clarification.</p>

Public Issues	Auditor Verification
Plantation Agency of Musi Rawas District <ul style="list-style-type: none"> The company has reported to the LPUP regularly. The company has used certified seeds for all seeds planted The results of field observations show that the company's fire prevention infrastructure is quite good. There were no fires and negative issues related to the company during the last 1 year Communication with the Plantation Office is quite good. 	<p>There are no negative issues that need further clarification.</p>
Manpower Agency of Musi Rawas District <ul style="list-style-type: none"> The company has routinely reported on PKWT, contractors, and the OHS Committee. The trade unions in the company have been registered with the office. The company has registered BPJS for Manpower and Health for all workers. M Sidik's case has been resolved in bipartite negotiations. Communication with Manpower Agency is quite good 	<p>There are no negative issues that need further clarification.</p>
Issues from the internet <ul style="list-style-type: none"> https://www.silampariberita.com/2021/09/badan-kpk-laporkan-pt-djuanda-sawit.html https://www.beritabersatu.com/2021/09/28/dugaan-intimidasi-pimpinan-pt-djuanda-sawit-lestari-kpk-mura-melapor-ke-disnakertrans/ 	<ul style="list-style-type: none"> Based on interview with the Manpower Office revealed that the M Sidik case had been resolved in a bipartite manner. The Joint Agreement No. 280/PB/HR PSM 2/10/2021 dated 11 October 2021 regarding the agreement to end the working relationship between A Sidik and PT DSL as of 23 September 2021. In the agreement, the Head of the Eradication Committee has witnessed among others Corruption in Musirawas Regency as the recipient of the power of attorney from A Sidik. The results of interviews with trade unions, that there are no labor problems.
Issues from the internet <p>https://indonesiadetik.com/jalan-desa-pagar-ayu-pt-juanda-putus/</p>	<p>The company has explained that the majority of the people in Pagar Ayu Village are farmers. They cleared the forest into oil palm and rubber plantations. They also open in peat and water catchment areas. This is one of the causes of flooding in their area. In addition, there is an area that stretches from the lowland/peat area of Pagar Ayu Village which flows downstream of the Petanang River, which has an impact on the tide of river water which causes the company area to be submerged.</p>
KUD Sadar Sejahtera (Village Unit Cooperative) <ul style="list-style-type: none"> There is MoU between PT DSL and Sadar Sejahtera cooperative. FFB prices based on prices determined by plantation agency. Changes in FFB prices can be found through the internet or informed directly from the Mill. There are no complaints related to payments both in payment 	<p>Certification Holder explained, that the new work agreement already prepared and soon to be signed with both parties in the</p>

Public Issues	Auditor Verification
<p>amounts and payment times. Everything has been done in accordance with the work agreement agreed with the company.</p> <ul style="list-style-type: none"> Details of smallholder farmer payments are available on the payment slip. Deduction on farmer payments include operational costs and fees for the company. <p>Negative Issues:</p> <ul style="list-style-type: none"> Valid date of work agreement almost expired when audit assessment performed. Certification holder needs to track the progress 	<p>manners time. All documents that supported those statement, already been shown by CH.</p>
<p>Worker Union (SBSI) of Muara Kandis Mill Worker Union (SPSI) of Muara Kandis Estate Worker Union (SPSI) of Muara Tawas Estate Labor Union of FSB Nikeuba Labor Union of SPPPP-SPSI Labor Union of SBDB-MR</p> <p>There was no negative issue related employment (minimum wage, overtime), and OHS such as PPE and PPE replacement.</p> <ul style="list-style-type: none"> So far there have been no labor violations committed by the company. There is no compulsion to become a member of a Labor Union for employees. So far, the company has never encountered any acts of discrimination against workers. Trade Unions already have a CLA The current PP is still valid. PPE is provided free of charge by the Company and if damaged it will be replaced by the Company. All employees have been registered and paid by BPJS Health and BPJS Employment by the Company The certification unit supports the existence of the union and gives freedom to unionized employees and facilitates the union by giving room as an office. In the past one-year period there were no work relationship disputes found, all employee rights were fulfilled by the certification unit in accordance with applicable regulations. 	<p>There was no negative issue needed for specific verification.</p>
<p>Worker Cooperative</p> <ul style="list-style-type: none"> Koperasi karyawan bergerak dibidang simpan pinjam. Employee cooperatives are engaged in savings and loans. The company provides facilities to cooperatives such as providing a place to become a cooperative office and stationery for cooperatives. 	<p>There are no negative issues that need further verification.</p>

Public Issues	Auditor Verification
<ul style="list-style-type: none"> The annual member meeting for the period 2021 will be held in the middle of year 2022. 	

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-between;"> <div style="text-align: center;"> <p>PT Djuandasawit Lestari Head of Sustainability Management System and Certification Operations Sustainability</p>  <u>Yahya Mustakim</u> Friday, 01 July 2022 </div> <div style="text-align: center;"> <p>MUTU International Lead Auditor</p>  <u>Hasiholan Sihombing</u> Friday, 01 July 2022 </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	Petrans Jaya Village	Sub District of Muara Lakitan, Musi Rawas District	-	Via telephone	21 June 2022	✓	
2	Lubuk Pandan Village	Sub District of Muara Lakitan, Musi Rawas District	-	Via telephone	21 June 2022	✓	
3	Karya Mukti Village	Sub District of Muara Kelingi, Musi Rawas District	-	Via telephone	21 June 2022	✓	
4	2 previous land owners who have been compensated from Lubuk Pandan Village.	Sub District of Muara Kelingi, Musi Rawas District		Direct Interview	21 June 2022	✓	
5	Plantation Agency	Musi Rawas District	-	Via telephone	21 June 2022	✓	
6	Manpower Agency	Musi Rawas District	-	Via telephone	22 June 2022	✓	
7	Environmental Agency	Musi Rawas District	-	Via telephone	21 June 2022	✓	
8	Land Agency	Musi Rawas District	-	Via telephone	22 June 2022	✓	
9	FFB Transport Contractor: PT Satrindo	Musi Rawas District	-	Direct Interview	21 June 2022	✓	
10	Gender Committee of Muara Kandis Mill	PT Djuandasawit Lestari	-	Direct Interview	21 June 2022	✓	
11	Gender Committee of Muara Kandis Estate	PT Djuandasawit Lestari	-	Direct Interview	21 June 2022	✓	
12	Gender Committee of Muara Tawas Estate	PT Djuandasawit Lestari	-	Direct Interview	21 June 2022	✓	
13	KUD Sadar Sejahtera (Plasma)	PT Djuandasawit Lestari	-	Direct Interview	21 June 2022	✓	
14	Local Contractor (Civil Contractor)	PT Djuandasawit Lestari	-	Via telephone	21 June 2022	✓	
15	Worker Union of SPSI (MKNE, MKNM, MTWE)	PT Djuandasawit Lestari	-	Direct Interview	21 – 22 June 2022	✓	
16	Worker Union of <i>Serikat Buruh</i> (MTWE)	PT Djuandasawit Lestari	-	Direct Interview	22 - 23 June 2022	✓	
17	Labor Union of FSB Nikeuba, SPPPP-SPSI, and SBDB-MR	PT Djuandasawit Lestari	-	Direct Interview	22 - 23 June 2022	✓	
18	Muara Kandis Mill workers: <ul style="list-style-type: none"> • 2 securities • 2 weighbridge operators • 1 grading workers • 6 process operators • 1 sterilizer operator • 3 boiler operators • 1 engine room operator • 2 emergency officers 	PT Djuandasawit Lestari	-	Direct Interview	21 June 2022	✓	

No	Institution/NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
	<ul style="list-style-type: none"> • WWTP officer • WTP officer • Hazardous Warehouse officer • Chemical warehouse officer • Land Application officer • Workshop officer 						
19	Muara Kandis Estate workers: <ul style="list-style-type: none"> • 6 Pesticide applicator • 8 Harvester • Genset officer • Warehouse officer • Mechanic • 1 warehouse officer • 1 firefighting officer 	PT Djuandasawit Lestari	-	Direct Interview	21 June 2022	✓	
20	Muara Tawas Estate workers: <ul style="list-style-type: none"> • 1 harvesting foreman • 2 harvesters • 2 pickers • 1 clerk • 1 Minitractor grabber • 1 contractor driver • 2 contractor loading workers • 1 pesticide foreman • 2 pesticide applicators • 1 maintenance foreman • 3 maintenance workers • 1 warehouse officer • 1 firefighting officer • 1 mechanic 	PT Djuandasawit Lestari	-	Direct Interview	22 June 2022	✓	
21	Sawit watch	Bogor, Indonesia	info@sawitwatch.or.id	Email	14 June 2022		✓
22	WWF	Jakarta, Indonesia	wwf-indonesia@wwf.or.id	Email	14 June 2022		✓
23	WALHI	Jakarta, Indonesia	informasi@walhi.or.id	Email	14 June 2022		✓
24	AMAN	Jakarta, Indonesia	rumahaman@aman.or.id	Email	14 June 2022		✓

Appendix 2 Assessment Program of audit

DATE	20 to 24 June 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 20 June 2022		
10.40 – 12.00	JAKARTA → LUBUK LINGGAU	All Auditor
12.00 – 14.00	• From the airport to the audit location in Musi Rawas District	All Auditor
15.00 – 16.00	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 PT DSL All Auditor
Tuesday, 21 June 2022		
08.00 – 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) Field Observation to Muara Kandis 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) 	SAS & HLN HHS HHS RAB
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	Field Observation to Muara Kandis POM <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 & HLN RAB

DATE	20 to 24 June 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
16.30 – 17.00	Submission of audit progress	All Auditor
Wednesday, 22 June 2022		
08.00 – 12.00	Field Observation to Muara Tawas 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 SASL RAB&HLN
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	<ul style="list-style-type: none"> • Continuing stakeholder consultation (if anything was not done the previous day) • Document Verification 	All Auditor
16.30 – 17.00	Submission of audit progress	All Auditor
Thursday, 23 June 2022		
08.00 – 12.00	<ul style="list-style-type: none"> • Continuing stakeholder consultation (if anything was not done the previous day) • Document Verification 	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	<ul style="list-style-type: none"> • Continuing stakeholder consultation (if anything was not done the previous day) • Document Verification 	All Auditor
16.30 – 17.00	Submission of audit progress	All Auditor
Friday, 24 June 2022		
08.00 – 09.00	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
10.00 – 11.00	Travel from hotel to airport	All Auditor
12.40 – 13.55	LUBUK LINGGAU → JAKARTA	All Auditor