

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

### [✓] Surveillance

Name of Management : Daya Labuhan Indah 2 Palm Oil Mill – PT Daya Labuhan Indah subsidiary of  
 Organization Wilmar International Limited  
 Plantation Name : PT Daya Labuhan Indah: Wonosari Estate & Sei Deras Estate  
 PT Perkebunan Milano: Cabang Dua Estate  
 Location : Sei Tampang Village, Bilah Hilir Sub-District, Labuhanbatu District, Sumatera  
 Utara Province, Indonesia  
 Certificate Code : **MUTU-RSPO/047**  
 Date of Initial Registration : 08 October 2014  
 Date of Last Issue : 21 October 2019                      Date of License Issue : 08 November 2022  
 Date of Certificate Expiry : 07 October 2024                      Date of License Expiry : 07 October 2023

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.3	21 to 24 June 2022	Rizliani Aprianita Hasibuan (Lead Auditor), Bayu Yogatama, Septian Maulana, Ririn Wahyuni Sipayung	Ardiansyah	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.3	21 July 2022

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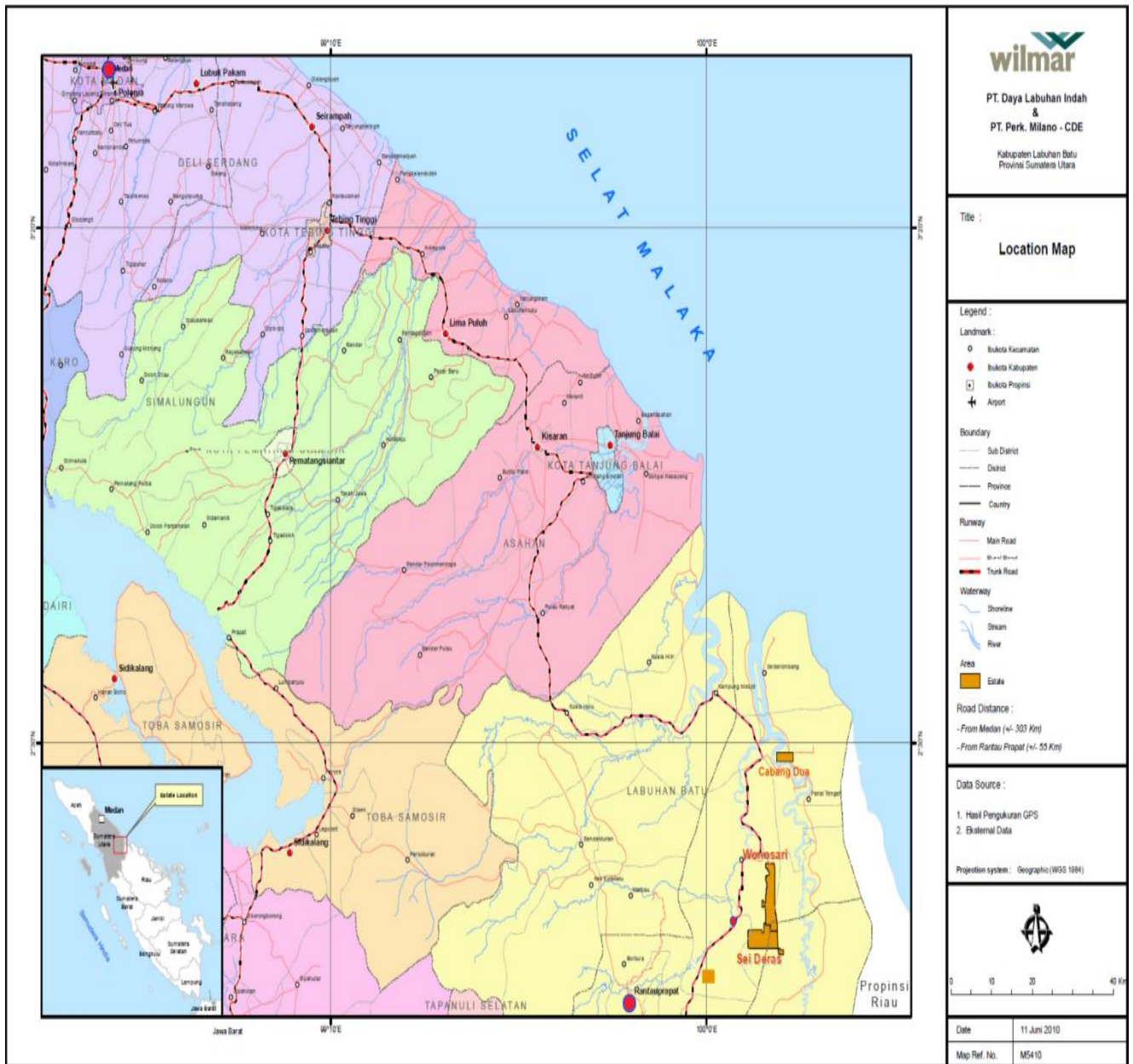
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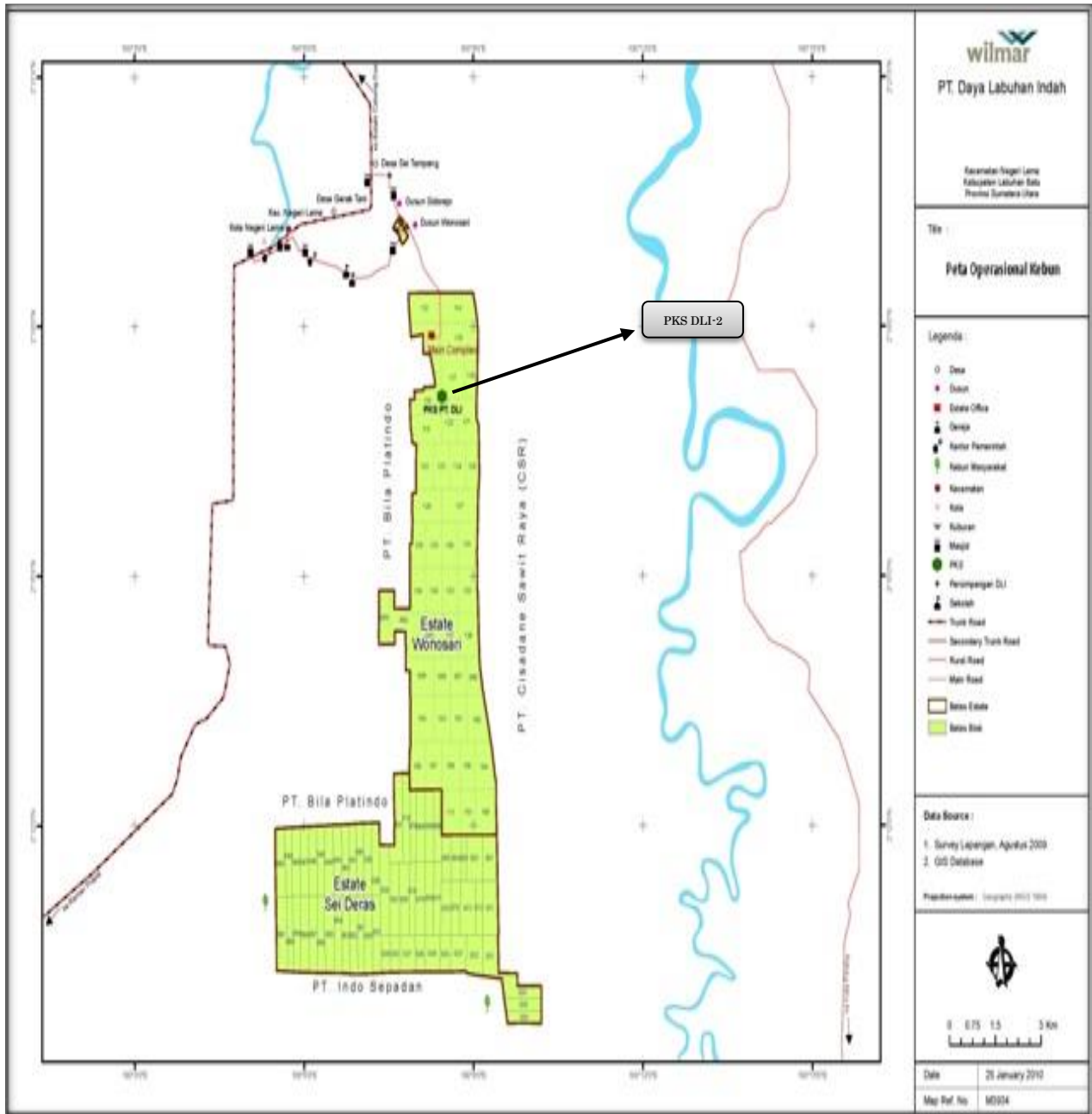
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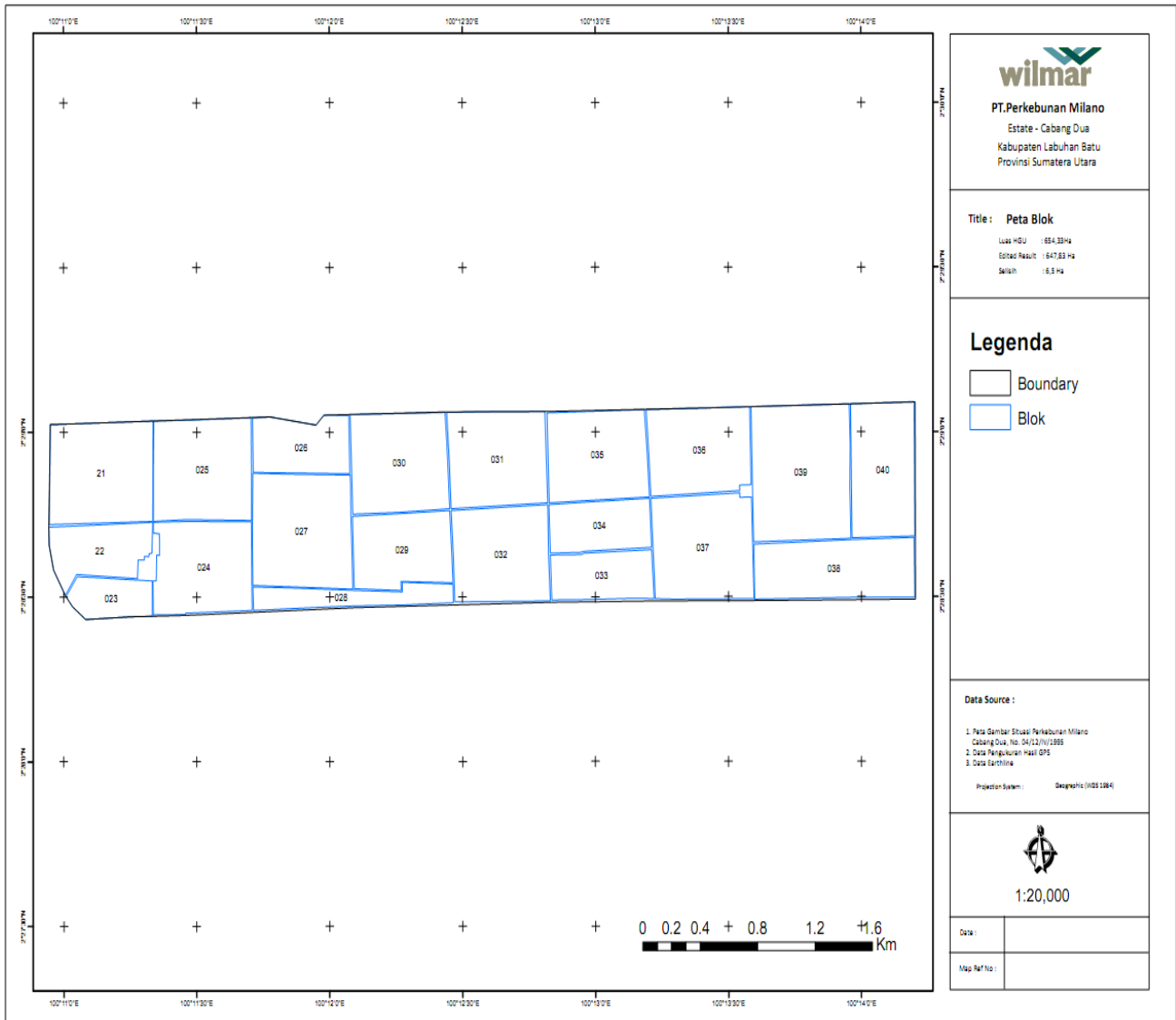
Figure 1. Location Map of PT Daya Labuhan Indah and PT Perkebunan Milano



**Figure 2. Operational Map of PT Daya Labuhan Indah – Wonosari Estate & Sei Deras Estate**



**Figure 3. Operational Map of PT Perkebunan Milano – Cabang Dua Estate**



**Abbreviations Used**

APAR	:	Fire Extinguisher ( <i>Alat Pemadam Api Ringan</i> )
ASA	:	Annual Surveillance Assessment
BOD	:	Biochemical Oxygen Demand
BPS	:	<i>Badan Pusat Statistik</i> (Central Bureau of Statistic)
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> / Social Security Administrator
CB	:	Certification Body
CDE	:	Cabang Dua Estate
CLA	:	Collective Labor Agreement
COD	:	Chemical Oxygen Demand
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Cooperation Social Responsibility
DLI	:	Daya Labuhan Indah
DLW	:	Decent Living Wage
DO	:	Dissolved Oxygen
EFB	:	Empty Fruit Bunch
EHS	:	Environment, Health, and Safety
EIA	:	Environment Impact Assessment
EM	:	Estate Manager
FFB	:	Fresh Fruit Bunch
FGD	:	Focus Group Discussion
FPIC	:	Free, Prior, Informed, Consent
FR	:	Frequency Rate
FSPM	:	<i>Federasi Serikat Pekerja Metal Indonesia</i> or Indonesian Metal Worker Federation
GHG	:	Green House Gasses
GPS	:	Global Positioning System
HCV	:	High Conservation Value
HGU	:	Land Use Title
HIRAC	:	Hazard Identification Risk Assessment Control
HRD	:	Human Research Development
HRGA	:	Human Resource and General Affair
ILO	:	International Labour Organization
IP	:	Identity Preserved
IPLC	:	<i>Izin Pembuangan Limbah Cair</i> (Waste Water Disposal Permit)
IPM	:	Integrated Pest Management
IRC	:	Industrial Relation Conflict
ISPO	:	Indonesia Sustainable Palm Oil
IUP	:	License of Plantation
KCD	:	<i>Kebun Cabang Dua</i>
KSD	:	<i>Kebun Sei Deras</i>
KTU	:	<i>Kepala Tata Usaha</i> / Head of Administration
KWS	:	<i>Kebun Wonosari</i>
LB3	:	Scheduled Waste
LCC	:	Legume Cover Crop
LD50	:	Lethal Dose 50
LSU	:	Leaf Sampling Unit
LTA	:	Lost Time Accident
LUCA	:	Land Use Change Analysis

MB	:	Mass Balance
MSDS	:	Material Safety Data Sheet
MT	:	Metric Ton
MU	:	Mature Upkeep
NDPE	:	No Deforestation No Peat No Exploitation
NGO	:	Non-Government Organization
NIOSH	:	National for Occupational Safety and Health
OFI	:	Opportunity for Improvements
OHS	:	Occupational Health and Safety
P&C	:	Principles and Criteria
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja / Occupational Health and Safety Committee</i>
PK	:	First Aid Kit
PKB	:	<i>Perjanjian Kerja Bersama or Collective Labor Agreement</i>
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PT DLI	:	PT Daya Labuhan Indah
RKL-RPL/UKL-UPL	:	Environment Management and Monitoring
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened, and Endangered
SCCS	:	Supply Chain Certification System
SDE	:	Sungai Deras Estate
SERBUNDO	:	<i>Serikat Buruh Perkebunan Indonesia or Indonesia Labor Plantation Union</i>
SIA	:	Social Impact Assessment
SOP	:	Standard Operational Procedure
SPSI	:	<i>Serikat Pekerja Seluruh Indonesia or Labor Union of Indonesia</i>
SR	:	Severity Rate
SSU	:	Soil Sampling Unit
UMSK	:	<i>Upah Minimum Sektor Perkebunan Kabupaten or District Minimum Wages of Plantation Sector</i>
WSE	:	Wonosari Estate
WTP	:	Water Treatment Plant
WWTP	:	Wastewater Treatment Plant



<b>1.0</b>	<b>SCOPE of the CERTIFICATION ASSESSMENT</b>		
<b>1.1</b>	<b>Assessment Standard Used</b>	<ul style="list-style-type: none"> <li>Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020</li> <li>RSPO Certification System for Principles &amp; Criteria and RSPO Independent Standard, Endorsed by RSPO Board of Governors on 12 November 2020</li> </ul>	
<b>1.2</b>	<b>Organisation Information</b>		
1.2.1	Organisation name listed in the certificate	Daya Labuhan Indah 2 Palm Oil Mill – PT Daya Labuhan Indah subsidiary of Wilmar International Limited	
1.2.2	Contact person	Jules Sonny Parapat	
1.2.3	Organisation address and site address	Head Office 56 Neil Road, Singapore 088 030  Official Liaison Office: Multivision Tower Lt. 15 Jl. Kuningan Mulia Kav. 9B, Kuningan, Jakarta, 12980, Indonesia	
1.2.4	Telephone	(62-21) 29380777	
1.2.5	Fax	-	
1.2.6	E-mail	<a href="mailto:jules.parapat@id.wilmar-intl.com">jules.parapat@id.wilmar-intl.com</a>	
1.2.7	Web page address	<a href="http://www.wilmar-international.com/">http://www.wilmar-international.com/</a>	
1.2.8	Management Representative who completed the application for certification	Jules Sonny (Certification Lead Indonesia)	
1.2.9	Registered as RSPO member	2-0017-05-000-00 15 August 2005	
<b>1.3</b>	<b>Type of Assessment</b>		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: Daya Labuhan Indah 2 Palm Oil Mill, Wonosari Estate, Sei Deras Estate and Cabang Dua Estate	
1.3.2	Type of certificate	Single	
<b>1.4</b>	<b>Locations of Mill and Plantation</b>		
1.4.1	Location of Mill		
	<b>Name of Mill</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	Daya Labuhan Indah 2	Sei Tampang Village, Bilah Hilir Sub-District, Labuhanbatu District, Sumatera Utara Province, Indonesia	N 02° 17' 10"      E 100° 08' 27"
1.4.2	Location of Certification Scope of Supply Base		
	<b>Name of Supply Base</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	Wonosari Estate	Sei Tampang Village, Bilah Hilir Sub-District, Labuhanbatu District, Sumatera Utara Province, Indonesia	N 02° 17' 54"      E 100° 08' 16"



	Sei Deras Estate	Bilah Village, Bilah Hilir Sub-district, Labuhanbatu District, Sumatera Utara Province, Indonesia		N 02° 10' 47"	E 100° 08' 08"		
	Cabang Dua Estate	Sei Nahodaris Village, Panai Tengah Sub-district, Labuhanbatu District, Sumatera Utara Province, Indonesia		N 02° 08' 36"	E 100° 11' 18"		
<b>1.5</b>	<b>Description of Area Statement</b>						
1.5.1	Tenure						
	<ul style="list-style-type: none"> <li>• State</li> <li style="padding-left: 20px;">- PT Daya Labuhan Indah</li> <li style="padding-left: 20px;">- PT Perkebunan Milano</li> <li>• Community</li> </ul>				<b>6,226.58</b> Ha 5,572.25 Ha 654.33 Ha Ha		
1.5.2	<b>Area Statement</b>						
		<b>Wonosari Estate</b>	<b>Sei Deras Estate</b>	<b>Cabang Dua Estate</b>	<b>Total</b>		
	<b>Total area</b>	<b>2,944.59</b>	<b>2,627.66</b>	<b>654.33</b>	<b>6,226.58</b> Ha		
	Planted area	2,581.65	2,483.29	612.90	5,677.84 Ha		
	Building and roads	350.03	34.21	38.82	423.06 Ha		
	Mill	12.91	-	-	12.91 Ha		
	HCV	-	9.12	2.61	11.73 Ha		
	Occupation area	-	101.04	-	101.04 Ha		
<b>1.6</b>	<b>Planting Year and Cycles</b>						
1.6.1	Age profile of planting year						
	<b>Planting Year</b>	<b>Hectarage (Ha)</b>					
		<b>Wonosari Estate</b>	<b>Sei Deras Estate</b>	<b>Cabang Dua Estate</b>	<b>Total</b>		
	2009	582.12	-	-	582.12		
	2010	904.23	-	-	904.23		
	2012	-	613.12	-	613.12		
	2013	-	995.11	71.65	1,066.76		
	2014	836.84	810.17	268.83	1,915.84		
	2015	258.46	64.89	-	323.35		
	2017	-	-	272.42	272.42		
	<b>Sub Total Mature</b>	<b>2,581.65</b>	<b>2,483.29</b>	<b>612.90</b>	<b>5,677.84</b>		
	<b>TOTAL</b>	<b>2,581.65</b>	<b>2,483.29</b>	<b>612.90</b>	<b>5,677.84</b>		
1.6.2	New Planting area after January 2010		Ha				
1.6.3	Planting Cycle		1 <sup>st</sup> Cycle or 2 <sup>nd</sup> Cycle				
<b>1.7</b>	<b>Description of Mill and Supply Base</b>						
1.7.1	Description of Mill						
	<b>Name of Mill</b>	<b>Capacity (tonnes/ hour)</b>	<b>FFB Processed (tonnes/year)</b>	<b>CPO</b>		<b>Palm Kernel</b>	
				<b>Out put (tonnes)</b>	<b>Extraction (%)</b>	<b>Out put (tonnes)</b>	<b>Extraction</b>

							(%)	
	Daya Labuhan Indah 2	30	142,781.91	29,538.03	20.69	4,751.71	3.33	
*Production data source from 12 months before assessment (June 2021 – May 2022)								
1.7.2	Description of Certification Scope of Supply Base							
	<b>Name of Estate</b>	<b>Total Area (Ha)</b>	<b>Production Area (Ha)</b>	<b>FFB (tonnes/year)</b>	<b>Yield (tonnes/ha/year)</b>	<b>Supplied to Mill</b>		
						<b>FFB (tonnes/year)</b>	<b>%</b>	
	Wonosari Estate	2,944.59	2,581.65	54,872.66	21.25	54,872.66	100	
	Sei Deras Estate	2,627.66	2,483.29	65,967.35	26.56	65,967.35	100	
	Cabang Dua Estate	654.33	612.90	12,674.09	20.68	12,674.09	100	
	<b>TOTAL</b>	<b>6,226.58</b>	<b>5,677.84</b>	<b>133,514.10</b>	<b>23.51</b>	<b>133,514.10</b>	<b>100</b>	
*Production data source from 12 months before assessment (June 2021 – May 2022)								
1.7.3	FFB description from other source							
	<b>Name of sources/Organisation (RSPO certified / non-certified)</b>	<b>Type of Organisation</b>		<b>number of smallholders</b>	<b>Production Area (Ha)</b>	<b>Supplied to Mill</b>		
						<b>FFB (tonnes/year)</b>		
	Merbau Estate (RSPO certified)	PT Perkebunan Milano subsidiary of Wilmar International Ltd		-	974.77	9,511.06		
	<b>TOTAL</b>						<b>9,511.06</b>	
*Production data source from 12 months before assessment (June 2021 – May 2022)								
1.7.4	Product categories			FFB, CPO, PK				
<b>1.8</b>	<b>Tonnage of Product</b>							
1.8.1	Past Annual Claim Certified Product			<b>Last Year Projected Certified Volume (Ton)</b>	<b>Actual Production (June 2021 – May 2022)</b>			
	FFB Process IP			160,800	142,781.91			
	FFB Process MB			7,801	-			
	CPO Production IP			33,641	29,834.87			
	CPO Production MB			1,600	-			
	Palm Kernel (PK) Production IP			5,873	4,751.71			
	Palm Kernel (PK) Production MB			280	-			
	Actual certified volume added opening stock CPO 296.84 MT and PK 82.86 MT							
1.8.2	Product selling							
	Type of selling product			Actual selling product for last year (June 2021 – May 2022) (MT)				
	CSPO sold as RSPO certified product			29,262.51				
	CSPK sold as RSPO certified product			4,778.68				
	CSPO sold under other scheme			0				
	CSPK sold under other scheme			0				
	CSPO sold as conventional			0				
	CSPK sold as conventional			0				
1.8.3	Estimate of Certified FFB Claim							

Name of Estate(s)	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)		Yield (tonnes/ha/year)
			IP	MB	
Wonosari Estate	2,944.59	2,581.65	55,765	2,935	22.74
Sei Deras Estate	2,627.66	2,483.29	67,925	3,575	28.79
Cabang Dua Estate	654.33	612.90	15,181	799	26.07
<b>TOTAL</b>	<b>6,226.58</b>	<b>5,677.84</b>	<b>138,871</b>	<b>7,309</b>	<b>25.75</b>

*\*Projected FFB production for 12 months of certificate (June 2022 – May 2023)*

**1.8.4 Estimate of Certified Palm Product Claim**

Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
			Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
DLI 2	30	138.871	30,550	22	5,550	4	IP
		7,309	1,600		290		MB

*\*Projected FFB production for 12 months of certificate (June 2022 – May 2023)*

**1.9 Other Certifications**

ISO 9001:2008	-
ISO 14001: 2004	-
OHSAS 18001:2007	-
ISCC	-
Others	

**1.10 Time Bound Plan**
**1.10.1 Time Bound Plan for Other Management Units**

Management Unit	Time Bound Plan	Estate (Supply Base)	Time Bound Plan	Location	Status
<b>Indonesia – Kalimantan Region</b>					
Mustika Sembuluh 1 POM Mustika Sembuluh POM 2 (PT Mustika Sembuluh)	2010	Mustika Sembuluh 1	2010	Central Kalimantan	Certified
	2015	Mustika Sembuluh 2	2010	Central Kalimantan	Certified
		Mustika Sembuluh 3	2010	Central Kalimantan	Certified
		KUD Bitu Maju Bersama	2014	Central Kalimantan	Certified
Kerry Sawit Indonesia 1 POM Kerry Sawit Indonesia 2 POM (PT Kerry Sawit Indonesia)	2011	Kerry Sawit Indonesia 1	2011	Central Kalimantan	Certified
		Kerry Sawit Indonesia 2	2011	Central Kalimantan	Certified
	2015	Kerry Sawit Indonesia 3	2011	Central Kalimantan	Certified
		KUD Karya Bersama	2023	Central Kalimantan	-
		KUD Sejahtera Bersama	2023	Central Kalimantan	
		KUD Tabiku Makmur	2023	Central Kalimantan	

		KUD Kosudra	2023	Central Kalimantan	
Bumi Sawit Kencana POM (PT Bumi Sawit Kencana)	2013	Bumi Sawit Kencana 1	2013	Central Kalimantan	Certified
		Bumi Sawit Kencana 2	2013	Central Kalimantan	Certified
POM 1 and POM 2 (PT Sarana Titian Permata)	2023	Sarana Titian Permata 1	2023	Central Kalimantan	-
		Sarana Titian Permata 2	2023	Central Kalimantan	-
		Sarana Titian Permata 3	2023	Central Kalimantan	-
Mentaya Sawit Mas POM (PT Mentaya Sawit Mas)	2015	Mentaya Sawit Mas 1	2015	Central Kalimantan	Certified
		Mentaya Sawit Mas 2	2015	Central Kalimantan	Certified
		KUD Karya Makmur Pahirangan	2023	Central Kalimantan	-
Rimba Harapan Sakti POM (PT Rimba Harapan Sakti)	2015	Rimba Harapan Sakti 1	2015	Central Kalimantan	Certified
		Rimba Harapan Sakti 2	2015	Central Kalimantan	Certified
		Serba Usaha Makmur Sejahtera Cooperative	2023	Central Kalimantan	-
Karunia Kencana Permaisejati POM (PT Karunia Kencana Permaisejati)	2017	Karunia Kencana Permaisejati 1	2017	Central Kalimantan	Certified
		Karunia Kencana Permaisejati 2	2017	Central Kalimantan	Certified
		Karunia Kencana Permaisejati 3,	2017	Central Kalimantan	Certified
Agro Nusa Investama POM (PT Agro Nusa Investama (Sambas))	2019	Agro Nusa Investama (Sambas) Estate	2019	West Kalimantan	Certified
		KUD Cempaka Biru	2019	West Kalimantan	Certified
		KUD Sentama Lestari	2019	West Kalimantan	Certified
		Sri Maram Estate	2023	West Kalimantan	-
		Sri Maram Cooperative	2023	West Kalimantan	-
		Pusaka Abadi Nan Jaya Cooperative	2023	West Kalimantan	-
		Anugrah Semaro Cooperative	2023	West Kalimantan	-
Bumipratama Khatulistiwa POM (PT Bumi Pratama Khatulistiwa)	2016	Bumi Pratama Khatulistiwa Estate	2016	West Kalimantan	Certified
		PT Buluh Cawang Plantation	2023	West Kalimantan	-
		KUD Buah Jubata	2023	West Kalimantan	-
Agro Nusa Investama (Landak) POM PT Agronusa Investama - Pahauman	2023	PT Agronusa Investama Pahauman Estate	2023	West Kalimantan	-
		Pratama Procentindo Estate (PT Pratama Procentindo)	2023	West Kalimantan	-
Agro Palindo Sakti POM (PT Agro Palindo Sakti 2)	2023	Agro Palindo Sakti Estate	2023	West Kalimantan	-
		Putra Indotropical Estate (PT Putra Indotropical Estate)	2023	West Kalimantan	-
		Daya Landak Plantation Estate (PT Daya Landak Plantation)	2023	West Kalimantan	-

		Indoresin Putra Mandiri (PT Indoresin Putra Mandiri)	2023	West Kalimantan	-
<b>Indonesia – Sumatera Region</b>					
Pinang Awan POM (PT Perkebunan Milano)	2009	Sei Daun	2009	North Sumatera	Certified
		Batang Saponggol	2009	North Sumatera	Certified
		Marbau	2009	North Sumatera	Certified
Tania Selatan POM (PT Tania Selatan)	2010	Burnai Barat	2010	South Sumatera	Certified
		Burnai Timur	2010	South Sumatera	Certified
Kencana Sawit Indonesia POM (PT Kencana Sawit Indonesia)  AMP Plantation POM (PT AMP Plantation)	2011	Kencana Sawit Indonesia (Division 1, Division 2 and Division 3)	2011	West Sumatera	Certified
		AMP I	2011	West Sumatera	Certified
		AMP II	2011	West Sumatera	Certified
		AMP III	2011	West Sumatera	Certified
		AMP IV	2011	West Sumatera	Certified
	2011	Primatama Mulia Jaya	2011	West Sumatera	Certified
		Tompek Tapian Kandis cooperative	2014	West Sumatera	Certified
		Mutiara Sawit Jaya cooperative	2014	West Sumatera	Certified
		Bukit Sandiang Tigo cooperative	2014	West Sumatera	Certified
		Agro Wira Masang cooperative	2014	West Sumatera	Certified
Buluh Cawang Plantation POM (PT Buluh Cawang Plantation)	2012	Bumi Arjo	2012	South Sumatera	Certified
		Dabuk Rejo	2012	South Sumatera	Certified
		Sukamulya	2012	South Sumatera	Certified
		Bambu Kuning	2012	South Sumatera	Certified
Gersindo Minang Plantation POM (PT Gersindo Minang Plantation)	2012	Gersindo Minang Plantation	2012	West Sumatera	Certified
		Permata Hijau Plantation 1	2012	West Sumatera	Certified
		Permata Hijau Plantation 2	2012	West Sumatera	Certified
		PT Permata Hijau Pasaman (block 22)	2023	West Sumatera	-
Daya Labuhan Indah POM (PT Daya Labuhan Indah)	2013	Wonosari	2013	North Sumatera	Certified
		Sei Deras	2013	North Sumatera	Certified
		Cabang Dua (PT Milano)	2013	North Sumatera	Certified
Murini Samsam POM (PT Murini Sam Sam)	2015	Murini Sam Sam Estate	2015	Riau	Certified
		Part of PT Murini Samsam areas (466 ha)	2023	Riau	-
Musi Banyuasin POM (PT Musi Banyuasin Indah)	2023	Sei Selabu	2023	South Sumatera	-
		Sei Jarum	2023	South Sumatera	-
		Agro Palindo Sakti	2023	South Sumatera	-

		Estate			
Sinarsiak Dianpermai POM (PT Sinarsiak Dianpermai)	2023	Sinarsiak Dianpermai Estate	2023	Riau	-
Agro Indah Persada 2 POM (PT. Agroindo Indah Persada)	2023	Agrindo Indah Persada Estate	2023	Bangko – Jambi	-
<b>Malaysia</b>					
Sapi POM (PPB Oil Palms Berhad)	2008	Sapi 1	2008	Sandakan, Sabah, Malaysia	Certified
		Sapi 2	2008	Sandakan, Sabah, Malaysia	Certified
		Kiabau	2008	Sandakan, Sabah, Malaysia	Certified
Reka Halus POM (PPB Oil Palms Berhad)	2008	Reka Halus	2008	Sandakan, Sabah, Malaysia	Certified
Sabahmas POM (PPB Oil Palms Berhad)	2008	Sabahmas	2008	Lahad Datu, Sabah, Malaysia	Certified
Saremas 1 POM (PPB Oil Palms Berhad)	2010	Saremas	2010	Bintulu, Serawak, Malaysia	Certified
		Saremas 2 (Div D)	2010	Bintulu, Serawak, Malaysia	Certified
		Suai	2010	Bintulu, Serawak, Malaysia	Certified
Saremas 2 POM (PPB Oil Palms Berhad)	2010	Saremas 2 (exclude Div D)	2010	Bintulu, Serawak, Malaysia	Certified
		Kaminsky	2010	Bintulu, Serawak, Malaysia	Certified
		Segarmas	2010	Bintulu, Serawak, Malaysia	Certified
Ribubonus (PPB Oil Palms Berhad)	2010	Ribubonus	2010	Sandakan, Sabah, Malaysia	Certified
Terusan POM (PPB Oil Palms Berhad)	2010	Terusan 1 + 2	2010	Sandakan, Sabah, Malaysia	Certified
		Rumidi	2010	Sandakan, Sabah, Malaysia	Certified
Sri Kamusan POM (PPB Oil Palms Berhad)	2011	Sri Kamusan	2011	Sandakan, Sabah, Malaysia	Certified
		Hibumas 1	2011	Sandakan, Sabah, Malaysia	Certified
		Hibumas 2	2011	Sandakan, Sabah, Malaysia	Certified
		Jebawang	2011	Sandakan, Sabah, Malaysia	Certified
		Sekar Imej	2011	Sandakan, Sabah, Malaysia	Certified
		Sapi Sugut	2011	Sandakan, Sabah, Malaysia	Certified
		Laba Utama (Div of Jebawang)	2023	Sandakan, Sabah, Malaysia	-
Suburmas POM (PPB Oil Palms Berhad)	2023	Suburmas	2023	Bintulu, Serawak, Malaysia	-
<b>Africa</b>					

BOPP POM, Biase Plantation Limited	2014	Adum Bansa	2014	Western Region, Ghana	Certified
		Scheme Smallholder	2014	Western Region, Ghana	Certified
-	-	Treboum Smallholders	2022	Western Region, Ghana	
Biase Plantation Limited	2020	Calaro	2022	Cross River State, Nigeria	Mill construction complete. Delay due to Covid
Biase Plantation Limited	2022	Calaro extension	2022	Cross River State, Nigeria	To be certified, NPP completed
Biase Plantation Limited	2020	Ibiae	2023	Cross River State, Nigeria	To be certified, NPP completed
Eyop Industries	2021	Ibad	2025	Cross River State, Nigeria	To be certified
Eyop Industries	2020	Kwa Falls	2025	Cross River State, Nigeria	To be certified
Eyop Industries	2021	Oban	2025	Cross River State, Nigeria	To be certified

*Time bound plan Indonesia update Januari 2021, Malaysia update June 2021, Africa update May 2021*

The revision of time bound plan because there is the change of certification time plan to 2022, 2023, and 2025 for some uncertified management units with reason is still in process to get land use right (Hak Guna Usaha) for some unit in Indonesia, pending NPP assessment for some unit in Africa, and delayed certification due to Covid-19 for some unit in Africa and Malaysia.

Regarding the TBP more than 2023, Wilmar has communicated about the TBP to RSPO on 16 July 2021. RSPO response about the TBP is RSPO approved on August 2021 the latest TBP with some notes to take into consideration by Wilmar.

Furthermore, the revision of time bound plan because some scheme smallholders has paid all costs relate of develop of scheme smallholder areas so that it has excluded from the time bound plan, its are Mekar Lestari Cooperative (PT Bumi Pratama Khjatulistiwa), KUD Damai Sejahtera (DASTRA) I & II (scheme smallholder under PT AMP Plantation and PT Primatama Mulia Jaya), KSU Mutiara Bosa Sikilang, KUD Permata Sawit Maligi, KUD Rantau Pasaman – Sasak and KUD Kapar (its supply based from PT Gersindo Minang Plantations)

The revision of time bound plan because two companies (PT Karya Agung Megah Utama & PT Perkebunan Anak Negeri Pasaman) has terminated the management agreement with PT AMP Plantation as stated in the termination agreement letter on 31 May 2019.

**1.10.2 Progress of Associated Smallholders and Out growers for Certifiable Standard**

Until this audit, Daya Labuhan Indah 2 POM has no engagement with associated smallholder and out grower for certifiable standard.



<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>ASA-1.3</b>	<ol style="list-style-type: none"> <li><b>Rizliani Aprianita Hasibuan (Lead Auditor).</b> Indonesian Citizen. Bachelor and Magister of Agribusiness, Faculty of Agriculture. She had followed training such as RSPO Lead Auditor Training, SA 8000, Lead Auditor ISO 9001;2008, ISO 14001;2004, ISPO Auditor training and followed several IHT related to environment, BMP etc. She has been involved in several audit activities related to sustainable palm oil certification since 2015 covering social aspect, health and safety aspect, worker welfare and waste management aspect. During the assessment she assigned to verified Legal, TBP, Social, SCCS, and Transparency.</li> <li><b>Bayu Yogatama (Auditor).</b> Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism, Bogor Agricultural University. Has attended the ISO 9001: 2015 Quality Auditor / Lead Auditor Course Quality Management System (QMS) course and ISO 19011: 2011 Guidelines for Auditing Management System, ISPO Lead Training, RSPO Lead Training, Green Industry Lead Training, SA 8000, IHT RSPO NPP, IHT RSPO RaCP, IHT ISO 17021, and IHT ISO 17065. Having experience working in plywood field as Inspector in foreign private company. Currently working for an independent certification body. During this assessment, he verified the Environmental, GHG, and Waste management aspects.</li> <li><b>Septian Maulana (Auditor).</b> Indonesian Citizen, Bachelor of Economic, Pamulang University. Have experience as sustainability staff on oil palm plantation. Training have been followed including Occupational Health and Safety Expert Candidate certification by Ministry of Manpower and Transmigration of Indonesia; Awareness Integrated Management Systems (ISO 9001:2015, ISO 14001:2015, ISO 45001:2018) in 2018; Basic Fire Fighting; Basic First Aid; Understanding the regulations and technical aspects of environmental management; Training of Immobilization after a venomous snake bite; Awareness ISO 19011:2011 in 2020; Awareness ISO 17065:2012 in 2020; Awareness ISO 17021:2015 in 2020; ISO 9001:2015 Lead Auditor in 2021, ISPO Lead Auditor in 2021, and RSPO Lead Auditor in 2021, Has conduct audit in aspect BMP, OHS, Worker Welfare, and Transparency since 2020. In this audit activity was verified OHS and Best Management Practices Aspect.</li> <li><b>Ririn Wahyuni Sipayung (Auditor Trainee).</b> Experience working for 6 years as a Sustainability Assistant in several private oil palm plantation companies in Indonesia. The trainings that have been attended include Refreshment New ISPO (Ministry of Agriculture 38 of 2020), Awareness (ISO 9001, ISO 14001, ISO 45001: 2018, ISO 19011: 2018, ISO 17021: 2015, ISO 17065: 2012), HCV Management in ISPO , In House Training in Environmental, Social, Transparency and BMP, Certification of Candidates for Occupational Safety and Health Experts (AK3U) by the Indonesian Ministry of Manpower, Certification of ISPO Auditors by LPP and ISPO Commission, Application of OHS in Oil Palm Plantations, Handling and Control of Estate Fires and Land by the KALBAR Provincial Plantation Office, B3 Waste Management by the KALBAR Provincial Environment Service, Traceability Supply Chain and Smallholder Engagement and so on. Has participated in several audit activities and in this audit, activity verified aspects of worker welfare and transparency under the supervision of the lead auditor.</li> </ol>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
<b>ASA-1.3</b>	<p>Number of auditors: 3 auditors and 1 trainee auditor</p> <p>Number of days for <b>ASA-1.3</b> Onsite Audit: 4 days</p> <p>Number of working days for <b>ASA-1.3</b> Onsite Audit: 12 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>ASA-1.3</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Daya Labuhan Indah. to the requirements of <b>Principles and Criteria for the Production of Sustainable Palm Oil 2018, the Indonesian National Interpretation, Endorsed by RSPO Board of Governors on 20<sup>th</sup> April 2020 and RSPO Certification System for Principles &amp; Criteria and RSPO Independent Standard, Endorsed by RSPO Board of Governors on 12 November 2020.</b></p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, aiming to obtain more detailed information and cross check the</p>

information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.

Some opportunities for improvement of the results RC delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA-1.4

Improvement of OFI in ASA 1.2 were observed by auditors at this RC assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of 1.3.

The opening meeting was held on June 21<sup>th</sup>, 2022. As for the participants who attended the opening meeting included the General Manager, Estate and Mill Managers, Support Team from Jakarta and other staff. Closing meeting was held on June 24<sup>th</sup>, 2022, attended by the same participants as the opening meeting. The management of PT Daya Labuhan Indah accept all the onsite 1.3 audit results.

The assessment program please find Appendix 2

<b>2.2.3</b>	<b>Locations of Assessment</b>
<b>ASA-1.3</b>	<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><b>DLI-2 Mill</b></p> <ul style="list-style-type: none"> <li>• <b>St. Loading Ramp.</b> Field observations and interviews related to OHS, BMP and employment aspects.</li> <li>• <b>St. Sterilizer.</b> Field observations and interviews related to OHS, BMP and employment aspects.</li> <li>• <b>St. Boiler.</b> Field observations and interviews related to OHS, BMP and employment aspects.</li> <li>• <b>St. Engine Room.</b> Field observations and interviews related to OHS, BMP and employment aspects.</li> <li>• <b>St. Kernel.</b> Field observations and interviews related to OHS, BMP and employment aspects.</li> <li>• <b>Hydrant No. 4 Simulation.</b> Field observations regarding the readiness of emergency response equipment and personnel skills.</li> <li>• <b>Workshop</b> Observation of OHS facilities, waste management and use of PPE by workers</li> <li>• <b>Security post.</b> Observation and Interview related to work procedure, emergency response, worker welfare, OHS implementation in mill, and supply chain aspect.</li> <li>• <b>Weighbridge station.</b> Observation and Interview related to supply chain aspect and worker welfare.</li> <li>• <b>CPO dispatch station.</b> Observation related to OHS implementation in mill, and supply chain aspect</li> <li>• <b>Grading Station.</b> Observations and interviews related work procedure, safety aspect, worker welfare etc.</li> <li>• <b>Warehouse</b> Observation of OHS facilities, waste management and availability of PPE</li> <li>• <b>Hazardous waste Warehouse</b> Observation of hazardous waste management, recording, storage, and emergency response facilities</li> <li>• <b>WTP</b> Observation of waste management, management of chemical use, use of PPE for workers and availability of flowmeters</li> <li>• <b>WWTP</b> Waste Management Observations, and interviews with workers regarding working hours, overtime, and wages</li> </ul> <p><b>Cabang Dua Estate</b></p> <ul style="list-style-type: none"> <li>• <b>Harvesting Activity Block 52.</b> Field observations and interviews related to OHS, BMP and employment aspects.</li> <li>• <b>Manuring Activity Block 47.</b> Field observations and interviews related to OHS, BMP and employment aspects.</li> <li>• <b>Subsidence Pole No. 1 Block 47.</b> Field observations related to peatland management.</li> <li>• <b>Piezometer No. 1 Block 47.</b> Field observations related to peatland management.</li> <li>• <b>Water Level Block 52.</b> Field observations related to peatland management.</li> <li>• <b>Barn Owl Box Block 47.</b> Field observations related to the implementation of integrated pest control.</li> <li>• <b>Fire Tower Block 47.</b> Field observations related to the implementation of fire monitoring and control.</li> <li>• <b>HGU stakes No. 2,3,4 Blok 46</b> Field observations to see the suitability of the coordinates, positions and conditions of the stakes.</li> <li>• <b>Chemical Warehouse.</b> Observations and interviews related to work procedures, OHS implementation, hazardous</li> </ul>

waste and hazardous material management mechanisms, and employment.

- **Fertilizer Warehouse.** Observations and interviews related to work procedures, OHS implementation and waste management mechanisms.
- **Hazardous Waste Warehouse.** Observations related to Hazardous waste management.
- **Generator House**
- **Rinse House and PPE Store.** Observations and interviews related to work procedures, Hazardous waste management, OHS implementation and employment.
- **Workshop.** Observations and interviews related to work procedures, OHS implementation, employment and waste management mechanisms
- **Clinic.** Observations and interviews related to treatment mechanisms, OHS, and medical waste management.
- **Clean water filling.** Observations and interviews related to work procedures, OHS implementation, employment and waste management mechanisms

#### Wonosari Estate

- **Harvesting Division 2 Block I56.** Field observations and interviews related to aspects of OHS, BMP and employment.
- **Activities for Fruit Picking Division 2 Block A13.** Field observations and interviews related to aspects of OHS, BMP and employment.
- **BOB Division 1 Block I23.** Field observations related to the implementation of integrated pest control.
- **Subsidence Stake Division 1 Block I12.** Field observations related to peatland management.
- **Chemical Warehouse.** Observations and interviews related to work procedures, OHS implementation, hazardous material and hazardous waste management mechanisms, and employment.
- **Fertilizer Warehouse.** Observations and interviews related to work procedures, OHS implementation and waste management mechanisms.
- **PPE warehouse.** Observations and interviews related to storage of Estate materials and PPE stock
- **Rinse House and PPE Store.** Observations and interviews related to work procedures, Hazardous waste management, OHS implementation and employment.
- **Housing division 2.** Observations and interviews related to facilities and infrastructure for the welfare of workers.
- **Fire Fighting Equipment Warehouse.** Observations related to the preparedness of land fire emergency ladder equipment.
- **Daycare.** Observations and interviews related to facilities and infrastructure for worker welfare, complaint mechanisms and employment.
- **Hazardous Waste Warehouse.** Observations related to Hazardous waste management.
- **Workshop.** Observations and interviews related to work procedures, OHS implementation, employment and waste management mechanisms
- **Clinic.** Observations and interviews related to treatment mechanisms, OHS, and medical waste management.
- **HGU Stake No. II Div 1 Block 112** Field observations to see the suitability of the coordinates, positions and conditions of the stakes.
- **HGU Stake No. III Div 1 Block 114** Field observations to see the suitability of the coordinates, positions and conditions of the stakes.
- **HGU Stake No. X Div 1 Block 115** Field observations to see the suitability of the coordinates, position and condition of the stakes.
- **HGU Stake No. V Div 1 Blok 125** Field observations to see the suitability of the coordinates, positions and conditions of the stakes.

#### Sei Deras Estate

- **HGU Stake No. XIV Block 11 divisi 2.** Field observations to see the suitability of the coordinates, positions and conditions of the stakes.
- **HGU Stake No. XV Block 94 divisi 2.** Field observations to see the suitability of the coordinates, positions and conditions of the stakes.
- **Harvesting Block I56.** Field observations and interviews related to aspects of OHS, BMP and employment
- **Housing division 7.** Observations and interviews related to facilities and infrastructure for the welfare of workers.

- **Manuring block I15.** Observations and interviews related to work procedures, OHS implementation and employment
- **Spraying block 98.** Observations and interviews related to work procedures, OHS implementation and employment
- **landfill block I12 division 2.** Observations related to domestic waste management
- **Chemical Warehouse.** Observations and interviews related to work procedures, OHS implementation, Hazardous material and Hazardous waste management mechanisms, and employment.
- **Fertilizer Warehouse.** Observations and interviews related to work procedures, OHS implementation and waste management mechanisms.
- **PPE warehouse.** Observations and interviews related to storage of Estate materials and PPE stock
- **Housing division 1.** Observations and interviews related to facilities and infrastructure for the welfare of workers.
- **Workshop.** Observations and interviews related to work procedures, OHS implementation, employment and waste management mechanisms
- **Rinse House and PPE Store.** Observations and interviews related to work procedures, Hazardous waste management, OHS implementation and employment.
- **Fire Fighting Equipment Warehouse.** Observations related to the preparedness of land fire emergency ladder equipment.

<b>2.3</b>	<b>Stakeholder Consultation and Stakeholders Contacted</b>
<b>2.3.1</b>	<b>Summary of stakeholder consultation process.</b>
<b>ASA-1.3</b>	<p>Summary of stakeholder consultation process            Consultation of stakeholders for PT Daya Labuhan Indah was held by:</p> <ul style="list-style-type: none"> <li>• Conduct public consultation via telephone to local government agencies in Labuhanbatu Regency on June 21, 2022</li> <li>• Interview with local village administrators on 21 June 2022</li> <li>• Interview with internal organizations on June 21, 2022</li> <li>• Interview with business partners on June 21, 2022</li> <li>• Consultation with NGOs (WALHI, WWF, AMAN, Sawit Watch) via email on 16 June 2022</li> </ul> <p>Numbers of input from stakeholders were clarified by PT DLI as a part of this report.</p>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	Please find appendix 1
<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit ASA-1.4 will be conducted eight (8) month to twelve (12) month after date of certificate issued

**3.0 ASSESSMENT FINDINGS**

**3.1 Summary of Assessment Report of the RSPO Certification**

MUTUAGUNG LESTARI has conducted an assessment of Daya Labuhan Indah 2 POM – PT Daya Labuhan Indah & PT Milano operation consisting of one (1) mill and three (3) oil palm estates.

During the assessment, there were No Nonconformities and three (3) opportunity for improvement were identified.

MUTUAGUNG LESTARI found that Daya Labuhan Indah 2 POM – PT Daya Labuhan Indah & PT Milano complied with the requirements of **Principles and Criteria for the Production of Sustainable Palm Oil 2018, the Indonesian National Interpretation, Endorsed by RSPO Board of Governors on 20<sup>th</sup> April 2020 and RSPO Certification System for Principles & Criteria and RSPO Independent Standard, Endorsed by 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
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>	
<b>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.</b>	
<p><b>1.1.1</b> The unit of certification shows a list of documents that can be accessed by stakeholders, that indicated by Letter No. 001/DLI-EXT/II/2021 dated February 6, 2021. The list of documents that can be accessed according to the letter are as follows:</p> <ul style="list-style-type: none"> <li>• UKL-UPL Document</li> <li>• Assessment Document and Social Impact Management Plan</li> <li>• Occupational Health and Safety Management System</li> <li>• Company Policy</li> <li>• Collective Labor Agreement</li> <li>• Permissions - Other related permissions</li> <li>• Plantation and mill operational procedures</li> <li>• Company organizational structure</li> <li>• HCV management documents</li> <li>• Implementation of CSR and CDP</li> <li>• Complaints and Handling</li> <li>• etc</li> </ul> <p>As explained by management representatives, for information that is not listed in the list and wants to be accessed, it must be approved by Top Management. The list of documents that can be accessed by the public has also been disseminated to stakeholders such as the Sei Tampang Village Head, Bilah Village Head, Labor Unions, and Bilah Hilir Sub-district Head through letter No 001/DLI/Ext/II/2021 dated 06 February 2021.</p>	
<p><b>1.1.2</b> The unit of certification can show evidence that information has been received in an appropriate form and language related to stakeholder involvement, unit of certification rights and obligations that are conveyed to all relevant stakeholders, including:</p> <ul style="list-style-type: none"> <li>• The Plantation Business Development Report for the second semester of 2021 was submitted to the Labuhanbatu Regency Agriculture Office on March 5, 2022.</li> </ul>	



- Investment report for the fourth quarter of 2021 with report Number 1332899 dated January 12, 2022.
- The 2021 land use report was submitted to the Labuhanbatu Regency Land Office on 23 February 2022

**1.1.3**

The company has Information Service Procedures for the Public with No. Document: SOP-BNM-003 Revision 01 Effective date February 1, 2015. The procedures include explaining the flow of requests and providing information. Based on the timeframe in the process, it is known that the longest period in the application process and providing information is one month. The unit of certification also has a logbook to record every request for information contained in the External Incoming Logbook. The logbook describes the date of the letter, origin, type of input (complaint, request for information, proof of delivery (letter/oral), recommendation, response (realization and date of response) and status. Records of requests and responses of stakeholder information is stored at Estate Office.

Based on the results of the logbook verification of requests for information in the last 1 year, it is known that the incoming mail is only related to requests for assistance. The company has responded to all incoming letters. For example :

- Incoming letter regarding the request for mosque assistance in the construction of the Sei Nahodari Village on January 5, 2022 and has been responded to on January 6, 2022.
- Incoming letter regarding the application for assistance for goats from Tampang Village on December 6, 2021 and has been realized on December 30, 2022

Based on interviews with government agencies, local communities, local contractors and internal stakeholder known that the company has responded to every information request as long as each request is submitted in accordance with the procedure and the requested type of information is publicly available information.

**1.1.4**

The company shows communication and consultation procedures with number PRO-GEN-011 revision number 03 dated October 26, 2017. The PICs who are in charge of communicating and consulting based on job descriptions are managers or unit heads. Based on the results of interviews with local contractors, village around, and government agencies, it is known that the stakeholders already know the mechanism for requesting and providing information as well as communicating and submitting complaints to the company, namely verbally through direct meetings or telephone and can also be through letters.

**1.1.5**

The unit of certification has provided an updated list of stakeholders in 2022 which consists of legal entities, worker organization, supplier, contractor, villages, and others (including NGO). The document contains a list of names, types of relevant stakeholders, stakeholder address and stakeholder contacts. Based on the list, known that the stakeholders can be contacted by auditor team.

Based on the stakeholder list document, it is known that these contacts can be contacted through interviews with representatives of internal and external stakeholders, for example, interviews with the Land Agency of Labuhanbatu Regency. The results of the interview can be seen in section 3.5 Summary of Arising Issues from Public and Auditor Verification.

**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 a policy related to ethical behavior which explains, among others:

1. Whereas the code of ethics is prepared based on 3 (three) main principles, namely
  - conflict of interest
  - authorized/position
  - To ensure the confidentiality of information and prevent information that can be carried out through the company's operational activities, either for personal interests or for purposes other than the interests of the company
2. In addition to the principles, an employee must be held accountable for every action taken and must set high standards of integrity and honesty at the core of the company.

3. While working in the company, all employees are not allowed to engage in business activities or any form of work that benefits themselves and is contrary to their responsibilities to the company, unless they obtain special and written approval from the company.
3. All employees are strictly prohibited from abusing their position in the company to do personal work or sell for personal gain or for other people whether work is done inside or outside the company location.
4. All employees must always act in the interests of the company, to avoid situations of possible conflicts of interest, employees must not engage in activities related to personal, investment or trade (association) interests that may affect their decisions in the interests of the company.

Based on this explanation, it can be said that the company already has a policy of ethical behavior. Based on the interview with contractor, known that the contractor has known the code of ethics of company.

**1.2.2**

The company already has a system to monitor compliance and implementation of these policies by monitoring of complaint. Based in monitoring of complaint, known that there are no complaint related to code ethics violation. Company has also socialized the code of ethics. For example, the socialization of the code of ethics was carried out on March 17, 2022, which was attended by staff and company leaders and the village head of Sei Nahodaris.

**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.**

**Compliance with Legal aspect:**

The total management area of the certification unit is 6,226.58 ha, all of which are included in the scope of RSPO DLI 2 POM certification, including:

- PT DLI HGU 4,694.5 ha
- HGU PT Perkebunan Milano – CDE 654.33 ha
- PT DLI does not have HGU / HGU process / has cadastral 877.75 ha (divided into 2 areas of cadastral maps)

**Land Use Title**

The HGU area consist of several certificates, that are :

- PT DLI → HGU Certificate No. 1 of 1992 on a land area of 4,694.5 hectares (located in Bilah Village, Bilah Hilir District, Labuhanbatu Regency, North Sumatra Province). The validity period of the HGU certificate is until December 31, 2022.
- CDE → HGU Certificate No. 2 of 1996 on a land area of 654.33 Ha (located in Sei Nahodaris Village, Panai Tengah District, Labuhanbatu Regency, North Sumatra Province). The validity period of the HGU certificate is until August 2021.

**Total → 5,348.83 Ha**

The company has shown progress in managing the extension of the HGU which has been described in indicator 4.4.1

**Environment Aspect:**

- AMDAL of PT DLI in accordance to Agriculture Minister number 054/ANDAL/RKL-RPL/BA/IV/95 dated 6 April 1995 with scope of assessment PT DLI Mill & Estate with area 5,000 Ha.
- RKL-RPL of PT DLI revision in accordance to Environment Bord District of Labuhanbatu Decree Letter with number 660/46/SET-KOMISI/VIII/2009 dated 31 August 2009 with scope plantation 4,694.5 Ha and DLI-2 POM with capacity 30 Ton FFB/hours.
- UKL-UPL of PT Perkebunan Milano Cabang Dua Revision in accordance to Environment Board Decree Letter with number 660/42/BLH-LB/AM/2012 dated 01 February 2012, scope area 654.33 Ha of Oil Palm Plantation.
- RKL-RPL of KSD PT DLI in accordance to number 660/21/BLH-LB/AM 2014 dated 12 February 2014 with area scope 445.88 Ha and also number 660/134/BLH/2/2014 dated 5 May 2014 with area scope 431.87 Ha



- Hazardous waste Storage Permit (Wonosari Plantation) Number 503.660.3/214/DPMPSTP-BP2MNP/2019 response April 1, 2019 which is valid for 5 years
- Hazardous waste Storage Permit (Wonosari POM) Number 503.660.3/409/DPMPSTP-BP2MNP/2021 in May 2021 which is valid for 5 years
- Hazardous waste Storage Permit (Cabang dua) Storage Permit Number 503.660.3/140/DPMPSTP-BP2MNP/2019 dated 26 February 2019 which is valid for 5 years
- Liquid Waste Disposal Permit (Wonosari POM) Number 503.660.31/266/DPMPSTP-BP2MNP/2018 dated May 4, 2018 which is valid for 5 years

The other compliances of regulations regarding to environment aspects are EIA management and monitoring in routinely, hazardous waste storage license approved by local government. Compliances of workers and OHS regulations are provided the minimum wage, company safety & occupational health, transporting and forklift operator, etc. Based on interview with stakeholders such as government agencies it is known that the company has comply the related regulations for example: has plantation business permit, land use right, no workers under age of 18, hazardous waste storage permit, etc.

**BMP & Worker Welfare**

- Use license pesticide
- Not use fire for land clearing
- Has implement minimum wage accordance with applicable regulation

**2.1.2**

The unit of certification already has a law register document which contains relevant regulations relating to operational activities. The law register is divided into four parts, namely the OHS sector, the Plantation Sector including business permits, the Manpower Sector, and the Environment Sector. In SOP-GEN-017 at point 6.4 it is stated that the EHS Officer/Regional Human Resources/Bina Mitra Unit makes a list of regulations, updates accuracy and compliance. Update on OFI in ASA 1.2 management unit shows Law Register 2021 which was updated in July 2021 and then for the ASA 1.3, the management unit can show the Law Register which was last updated in January 2022.

**2.1.3**

The company already has a stake maintenance procedure contained in the SOP document for the Maintenance of HGU Boundary No. SOP-BM.LING-007 revision 00 dated November 3, 2011. In the SOP it is explained that the checking of boundary stakes is carried out every quarter. The SOP also explains that Bina Mitra and security are tasked with re-checking HGU boundaries.

The company also shows records of monitoring HGU stakes that are carried out periodically, for example:

- CDE has shown a recording of monitoring and maintenance of HGU stakes for the period March 2022 based on the minutes of monitoring of HGU stakes at PT Perkebunan Milano Cabang Dua Estate dated March 11, 2022. There are 11 HGU stakes in CDE and all stakes are in good condition.
- PT DLI has been shown a recording of monitoring and maintenance of HGU stakes for the period of June 2022 based on the minutes of monitoring on June 9, 2022. All stakes are in a well-maintained condition.

The results of field observations to the area of HGU boundary stakes, it is known that all stakes were found in a well-maintained condition. In addition, there is no indication of planting outside concession area.

<b>Status: Comply</b>
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**2.2**

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

**2.2.1**

The company already has a list of contractors that contained in the stakeholder list, the contractor list is in line with information in the stakeholder list, the names and telephone numbers listed are appropriate and can be contacted. All

contractors including hazardous waste contractors, machinery contractors have been included in the list of stakeholders, some examples include:

- Building contractor on behalf of CV. Parlan Jaya is located at Jalan S. Parman Sigambal Labuhanbatu
- Building contractor on behalf of CV. Sima Labura Sakti which is located in Sidodadi Hamlet, Marbau Village, Labuhanbatu Utara District
- Building contractor on behalf of CV. Sumber Makmur Sejahtera having its address at Sidorejo, Pengarungan Village, Torgamba District, South Labuhanbatu
- Water Installation Contractor on behalf of CV. AL Gufrans Habib, whose address is at Sei Beluru Village, Meranti Asahan District

Based on this information, it can be seen that the company already has a list of the parties to the contract.

### 2.2.2

The company has set a separate clause regarding compliance with applicable laws in cooperation contracts with third parties, for example for contract number 002/MLN-CDE/SPK/II/2022 including:

1. Duties and Scope of Work
2. Basic Work Implementation
3. First Party Supervisor
4. Job Completion Time
5. Job Price
6. Payment Method
7. Sanctions and Fines
8. Risk, Loss and Repair
9. Termination of Agreement
10. Materials and Work Tools
11. Second Party Executor
12. Occupational Health, Safety and Environment (K3LH)
13. Coordination Meeting
14. Adding or Removing Jobs
15. Second Party Representations and Guarantees
16. Force Majeure
17. Insurance
18. Government Policy in the Monetary Sector
19. Taxes, Permits and Other Charges
20. Power
21. Compensation
22. Dispute Resolution
23. Miscellaneous

Based on the results of interviews with 2 contractor workers at DLI 2 POM for compound work, it is known that workers have received wages in accordance with the minimum wage provisions, besides that workers have been registered in the BPJS health and employment program.

### 2.2.3

The company has a child protection policy that explains, among other things, that Wilmar has zero tolerance for child labour, any form of child exploitation, and child abuse and Wilmar is committed to ensuring the rights and protection of children under the age of 18 (as defined by the UN convention on the rights of children).

The company is also committed to taking all necessary steps to protect children from all forms of exploitation and abuse. As a form of the implementation of the policy, the company will ensure that this policy is publicly available throughout the company and will be clearly communicated to all employees, contractors, and providers in an understandable way. From the results of interviews with the contractors, that none of the workers employed were under 18 years of age.

Based on this explanation, it can be concluded that the company's implementation of the policy is included in the cooperation contract made by the company to third parties.

<b>Status: Comply</b>							
<b>2.3</b>							
<b>All FFB supplies from outside of the unit of certification are from legal sources.</b>							
<b>2.3.1; 2.3.2</b>							
Until surveillance 1.3 is carried out, the unit of certification does not receive FFB from suppliers and all FFB received is RSPO certified. The results of supply chain document verification and interviews at the FFB reception location (security and weighbridge operator) revealed that FFB entering DLI 2 POM came from own plantations (Wonosari Estate, Sei Deras Estate) and PT Perkebunan Milano among others Cabang Dua Estate ( Supply base of DLI 2 POM) and Merbau Estate which RSPO certified with certificate register No. 824 502 14010.							
<b>Status: Comply</b>							
<b>PRINCIPLE #3 OPTIMISE PRODUCTIVITY, EFFICIENCY, POSITIVE IMPACTS AND RESILIENCE</b>							
<b>3.1</b>							
<b>There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</b>							
<b>3.1.1</b>							
The company shows PT Long Term Plan Documents for example PT Daya Labuhan Indah (KSD & KWS) and PT Perkebunan Milano (KCD) Long Term Plan Documents for the period 2021 – 2017, briefly as follows:							
PT Daya Labuhan Indah (KSD & KWS)							
<b>Description</b>	<b>Unit</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>
FFB Production	MT	129,000	125,650	127,700	129,200	128,700	129,050
Installed Capacity	MT	352,800	352,800	352,800	352,800	352,800	352,800
Own FFB Processed	MT	129,000	125,650	127,700	129,200	128,700	129,050
Related co. FFB Processed	MT	25,300	29,050	31,100	35,550	37,100	36,850
Outside FFB Processed	MT	175,925	175,925	175,925	175,925	175,925	175,925
Total FFB Processed	MT	330,225	330,625	334,725	340,675	341,725	341,825
Mill Utilization	MT/Y	93.60%	93.70%	94.90%	96.60%	96.90%	96.90%
OER	%	20.30%	20.30%	20.40%	20.40%	20.40%	20.40%
KER	%	4.10%	4.10%	4.10%	4.10%	4.10%	4.10%
CPO Production	MT	67,156	67,248	68,191	69,559	69,801	69,824
PK Production	MT	13,626	13,641	13,792	14,012	14,051	14,055
FFB Price	Rp000/MT	2,029	2,426	2,366	2,384	2,385	2,385
FFB Price Outside	Rp000/MT	1,766	2,358	2,300	2,318	2,318	2,318
CPO Price	Rp000/MT	9,615	10,963	10,691	10,748	10,748	10,748
PK Price	Rp000/MT	4,592	7,126	6,949	6,986	6,986	6,986
Profit (Loss) after tax	Rp Million	111,007	109,392	101,986	101,168	91,147	86,349
PT Perkebunan Milano (KCD)							
<b>Description</b>	<b>Unit</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
FFB Production	MT	94,273	80,950	66,054	74,282	93,062	12,6761
<b>3.1.2</b>							
The results of the study of the area statement document and field observations, it is known that the distribution of planting years in the company is between 2009 – 2017 and the company does not have a replanting plan for the next 5 years.							
<b>3.1.3</b>							
The company showed a management review recording dated June 17, 2022 in the KWS Meeting Room which discussed,							

among others, related to:

- Company policy
- Organizational structure
- Operational conditions
- Transparency aspect
- Certification audit
- Previous review management
- Legal requirements
- Best practice
- Use of chemicals
- Energy efficiency
- Waste and pollution management
- HCV maintenance
- Environmental Aspects and OHS
- General Environmental and Social Aspects

Based on the results of the management review meeting, there are several suggestions including:

- Response to incoming mail
- Fulfillment of Emergency Response Team equipment
- Work accident
- Use of PPE
- Avoiding sick weekday hikes
- Controlling the use of used chemical packaging drums at home
- Overcome crop rotation that is too high

**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**

**Best Management Practice Aspects**

The company has implemented sustainable improvement plans, including by no longer using pesticides with the active ingredient paraquat, integrating biological pest control in order to reduce the use of pesticides by utilizing natural enemies of pests such as *tyto alba* and beneficial plant, namely *Turnera subulata*.

**3.2.2**

The company has shown the auditor regarding the RSPO metric template Version 2.1 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. Based on team auditor's review, the information has been match with others document, such as supply chain record, demographic workers, work accident, etc.

**Status: Comply**

**3.3**

**Operating procedures are appropriately documented, consistently implemented and monitored.**

**3.3.1**

The company shows procedures covering all activities at the Mill and Estate which are available in Indonesian, some of which are as follows:

- Procedure for oil palm processing are presented in document No. SOP-MILL-001 to No. SOP-MILL-044, with the most updated was dated on 05 December 2017. The procedure has covers FFB acceptance, FFB Grading, Weigh Bridge, FFB processing, laboratory works, operational on processing Stations (Loading Ramp, Sterilizer, Thresher, Digester, Screw Press, Vibrating Screen, Crude Oil Tank, Decanter, Oil Tank, Sludge Tank, Depericarter, Nut Silo, Ripple Mill, LTDS, Claybath and Kernel Silo), dispatch of CPO and kernel, transportation and supply chain management system.

- Procedure for oil palm agronomy are presented in document No. PRO-EST-001 to PRO-EST-018, with the most updated was dated on 01 April 2019. The procedure has covers nursery, legume cover crop, replanting, field upkeep, harvesting, as well as integrated pest and disease management.
- Procedure of safety are presented in several documents such as No. PRO-EHS-14 dated 01 March 2012 and No. PRO-GEN-013 dated 01 July 2012 about emergency situation including first aid, No. SOP-GEN-002 dated 01 February 2015 about HIRAC and No. FRM-GEN-068 about fire monitoring. Further detail on safety working procedure is described in Hazard Identification Risk Assessment Control (HIRAC) and Material Safety Data Sheet (MSDS) of agrochemicals.

Based on the results of field observations and interviews with Estate workers (eg harvesting activities) and Mill workers (eg in St. Boiler) it is known that workers already have an understanding of work procedures in their respective work areas.

**3.3.2**

The company already has a mechanism to monitor the implementation of procedures consistently, including those contained in the following documents:

- Internal Audit Procedure No. SOP-GEN-015 Revision 2 dated August 1, 2015, briefly explains that Internal Audit is conducted periodically, which is once a year.
- Internal Audit Procedure No. PRO-GEN-003 dated August 1, 2016, briefly explains one of them for PT Perkebunan Milano in general, internal audit is carried out at least once a year.

In addition, the work carried out by the contractor will be checked for suitability, one of which is before the submission of the payment stages.

**3.3.3**

The company shows the monitoring and follow-up records contained in the internal audit report, for example as follows:

- Report on PHI Visit of PT DLI KSD dated April 6, 2022 which informs the Summary of Comments & Recommendations/ Management Response & Action Plan.
- Report of PHI Visit of PT Milano KCD dated April 7, 2022 which informs the Summary of Comments & Recommendations/ Management Response & Action Plan.

**Status: Comply**

**3.4**

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

**3.4.1, 3.4.2**

The management unit does not carry out New Operations, either new plantings or new operations of POM. The entire impact of environmental management and monitoring is still the same as the previous audit activity. The unit of certification has four environment impact assessment document were approved by Head of Labuhanbatu District Environmental Agency, covering different area with the following details :

- *Analisa Dampak lingkungan (ANDAL)* for estate area of 4,694.5 ha in 2009 and 30 tonne FFB/hour
- *Upaya pengelolaan dan pemantauan lingkungan (UKL/UPL)* for Sei Deras estate covered 445.88 ha in 2014
- *Upaya pengelolaan dan pemantauan lingkungan (UKL/UPL)* for Sei Deras estate covered 431.87 ha in 2014
- *Upaya pengelolaan dan pemantauan lingkungan (UKL/UPL)* for cabang dua estate covered 654.33 ha in 2012

All of the EIA documents explained all activities for pre-construction, construction, operation, and post operation for example (road construction, field drain construction, housing and facilities, waste water treatment plant, IPM, replanting, biodiversity, and etc) covered the palm oil mill, Sei Deras estate, Wonosari estate, Cabang Dua estate.

The unit of certification have planned and includes monitoring protocol outlined in periodically social environmental monitoring and management plan (RKL/RPL) and implemented this plan to monitor the effectiveness of the management activities to mitigate negative impact and enhance positive impacts, for example regarding water management aspects, company has included the results of water level monitoring on peat areas on Semester 2 2021.

PT DLI and PT Milano has conduct social impact assessment by independent consultant. The scope of study are impact of plantation and mill operation to workers and community surrounding company areas. These assessments also identified negative and positive impact of plantation and mill operation towards social aspect. Based on document review shown that current SIA has describing and identified potential social impact related vulnerable groups, community perception, environment and health, local economy, land use changes, livestock intrusion by shepherd, workers facilities and etc. SIA identifications was also done based on affected parties consultation, this matter are amplified by stakeholders e.g Sei Tampang and Bilah villagers during stakeholder consultation and besides that based on interview with local community shown that major impacts has been identified and managed by company. In addition, the SIA review activity has involved elements of internal stakeholders consisting of Trade Unions and Workers Representatives.

The unit of certification also has established management plan and monitoring plan related for social & environment impact based on the impact identification period of 2022 – 2024. This plan were developed with participation affected stakeholders dated 2 January 2022. This plan has been informed the positive and negative impact including management planning time frame and the person in charge for the activity, such as:

#### External Issues

- Employee recruitment: the job opportunity for nearby communities.
- Communication with stakeholders: the respond letter from company are need much time.
- Reporting of community activities on the estate: the village board didn't know: if any "kenduri" on emplacement
- Company transport: there is dust in the village through which FFB, CPO, and PK transports
- CSR: CSR on infrastructure and religious aspect needs to be improved.

#### Internal Issues:

- OHS: there are several worker are not aware about PPE's importance & there are workers who don't workers with pesticide, however still exposed by chemical.
- Clean Water: there are damage and leakage in the water tank.

#### 3.4.3.

The unit of certification was shown documents of UKI-UPL (KSD, KCD), RKL-RPL (KSW and DLI 2 POM) realization report for 2<sup>nd</sup> Semester of 2021. The report was made in a participatory manner by involving to internal and external stakeholders. There are several parameters which monitored and managed by them. For example:

- Effluent quality and ground water quality test
- Solid waste management
- Hazardous waste management
- Air and ambient quality test
- High noise level monitoring
- Odor quality test
- Flora and fauna
- Potential of fire
- Community perceptions
- Job opportunity
- Community Health
- Change in the nature and function of peat
- Soil quality test

The unit certification also shown social impact monitoring and management activities for last year period, for example:

- New employee recruitment on each unit
- Mailing with stakeholders/communication with stakeholders
- Reporting of employee activities to the local agency
- Road maintenance on surrounding village



- OHS aspect: PPE's usage monitoring
- Clean water: well water and sanitation for all employees and water depot on each emplacement.

PT DLI and PT Milano have carried out social impact assessments by independent consultants. The scope of the study is the impact of plantation and mill operations on workers and communities around the company area. This study also identifies the negative and positive impacts of plantation and mill operations on social aspects. Based on the document review shows that the current SIA has described and identified potential social impacts related to vulnerable groups, community perceptions, environment and health, local economy, land use change, disturbance of livestock by herders, worker facilities and others. consultations with affected parties, this was reinforced by stakeholders such as villagers from Sei Tampang and Sei Bilah during stakeholder consultations and in addition based on interviews with local communities indicated that major impacts have been identified and managed by the company.

Based on the results of the review of the environmental management implementation document, it is known that all environmental management and monitoring impacts have been carried out according to the existing matrix and the result of environmental monitoring still accordance with the regulation. The report writing has referred to KepMenLH45 of 2005 regarding the rules for writing RKL-RPL reports. In addition, the report has been submitted to the relevant Department.

- Report on the Implementation of PT DLI's RKL-RPL semester 2 of 2021 to the Labuhanbatu Regency Environmental Service on January 31, 2022.
- Proof of electronic receipt of RKL-RPL reporting through SIMPEL for the period 1 July 2021 – 31 December 2021 with TTE ID 1652719764-3306.
- Report on the Implementation of PT Milano's RKL-RPL semester 2 of 2021 (Cabang 2) to the Labuhanbatu Regency Environment Agency on 31 January 2022
- 

**Status: Comply**

**3.5**

**A system for managing human resources is in place.**

**3.5.1**

The company has a recruitment procedure as stated in the document number SOP-HRD-004, Promotion Policy No. 043/CEO-WIP/SKD-VI/2014, as well as the 2021-2023 Collective Labor Agreement between the company and the Labor Union. In the document, clauses have been set regarding the mechanism and process of recruitment, transfer and promotion, and termination of employment in accordance with Law Number 13 of 2013 regarding employment. Based on a review of recruitment documents and agreements, as well as interviews with workers and labor unions, the recruitment, promotion and retirement procedures have been well socialized and implemented. There is no discrimination related to these processes, where the assessment of applications and promotions is based on the requirements and assessment of competence and merit, which have been described in previous vacancies. There is no differentiation of rights and obligations in the same type of work.

**3.5.2**

Employment procedures have been regulated in the Collective Labor Agreement (PKB) for the period 2021 – 2023, ratified on January 24, 2022 by the Manpower Office number 550/0212/DTK-4/2022 and valid until January 24, 2023.

The CLA regulates the rights and responsibilities of companies and workers, permanent employee appointment, recruitment processes, promotions and demotions, working time management, payment systems, social insurance, termination of contracts, and so on. Based on interviews with workers, it is known that they understand the rights and obligations of workers as stated in the collective labor agreement. This has been disseminated to workers by management representatives.

In the PKB it is regulated that the minimum wage refers to government regulations. Based on the verification of the payment slip, the company pays the minimum wage to the worker referring to the Wage

The Sectoral Minimum of Labuhanbatu Regency in 2020 based on Governor's Decree No. 188.44/17/KPTS/2020 dated January 13, 2020, amounting to Rp. 3,284,500/month. The company indicates that the minimum wage for all workers is



not below that amount.

The company can show evidence of employee performance appraisal for harvesters as stated in Decree No. 031/DLI-HRR/SK/XII/2021 concerning Determination of Permanent Employees with the provisions of the assessment based on willingness to learn, quality of work, quantity of work results, punctuality in completing tasks, willingness to work overtime.

Based on this explanation, the company has been able to show evidence of the implementation of the employee assessment.

**Status: Comply**

**3.6**

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

**3.6.1**

The company shows a risk identification document for all activities in the Mill and Estate which is contained in the document Identification, Assessment and Control of Potential Hazards for OHS and Environmental Risks for the 2022 Period which informs the Work Location, Job Description, Condition, Hazard Source, Impact, Initial Risk, Hazard Control current risk, current risk, planned hazard control, and final risk.

Based on the results of field visits and interviews with workers, for example in St. Boilers and St. Engine Room, it is known that workers already have an understanding of the potential hazards that exist in their work area and have used PPE as required.

Based on the explanation above, it can be concluded that the company already has the results of risk identification and implementation plans that have been socialized to workers.

**3.6.2**

The company demonstrates monitoring of OHS effectiveness, including through routine inspections of emergency response facilities and infrastructure including fire extinguishers, hydrants, first aid kits and bags, OHS testing and inspection of equipment and machinery, monitoring of worker certificates and licenses as well as health checks for workers.

The results of the study of MCU implementation documents and interviews found facts including:

- Recapitulation of the results of the PT DLI DLI-2 POM MCU from the Prodia Clinical Laboratory in 2021, carried out to 88 workers with Serum Glutamic Oxaloacetic Transaminase, Serum Glutamic Pyruvic Transaminase and Audiometry examinations. The conclusion of the examination results stated that all workers were declared eligible to work.
- The results of the Cholinesterase examination of PT Perkebunan Milano in 2022 from Sri Pamela Torgamba Hospital on March 18, 2022 on 15 workers (Spraying, Manuring, Tractor Operators, Warehouse Officers and Foreman) with all normal results.
- The results of the Cholinesterase examination of PT Daya Labuhan Indah Sei Deras in 2022 from Sri Pamela Torgamba Hospital on March 18, 2022 for 26 workers with all normal results.
- The results of the Cholinesterase examination of PT Daya Labuhan Indah Wonosari in 2022 from Sri Pamela Torgamba Hospital on March 18, 2022 for 32 workers with all normal results.

Related to OFI in the previous assessment, known that the Gastroenteritis disease has been reduced by provide clean water and socialization about not to consume the rain water. This is also support by interview with paramedic and data clinic.

Based on the results of the interview, it was conveyed that periodic (general) health checks for all workers and spirometry checks could not be carried out due to Covid-19 constraints, so the company had improvement opportunities to be able

to realize periodic (general) health checks for all workers and spirometry health checks for workers with certain risks and carry out follow-up actions if workers are found to have health problems while still observing the Health protocol to prevent the transmission of COVID-19. (OFI)

**Status: Comply**

**3.7**

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

**3.7.1 & 3.7.2**

The company already has well-documented training, for example, the company has a document identifying OHS training needs which was made in November 2021, while the training aims to increase knowledge and insight for employees to work safely and safely and be able to handle emergencies. The training consisted of emergency action plant training and safety mill operation.

In addition, the company also has minutes of training activities that have been carried out on May 9, 2021 which were attended by EHS and Contractors, while the socialization of the training included training in hot work areas attended by 5 employee representatives.

Based on the results of interviews with company employees and contractor employees that these employees have received training from the company, for example OHS training and other training related to work procedures owned by the company.

Based on this explanation, the company already has a training identification program and the realization of training activities provided to company employees and company contractors.

**3.7.3**

Company showed the training documentation of supply chain aspect which conducted on January, 15 2022 attended by 12 participants/workers. Then, based on interview with security and weighbridge operator, it is known that they understand about the supply chain aspect.

**Status: Comply**

**3.8**

**Supply Chain Requirements for Mills**

**3.8.1 & 3.8.2**

The certification unit implemented two model of SCCS (Identity Preserved and Mass Balance). However, until surveillance 1.3 is carried out, the unit of certification does not receive FFB from non-certified suppliers and all FFB received is RSPO certified. The results of supply chain document verification and interviews at the FFB reception location (security and weighbridge operator) revealed that FFB entering DLI 2 POM came from own plantations (Wonosari Estate, Sei Deras Estate) and PT Perkebunan Milano among others Cabang Dua Estate (Supply base of DLI 2 POM) and Merbau Estate which RSPO certified with certificate register No. 824 502 14010.

**3.8.3**

During the assessment, estimates of CPO and PK produced by DLI 2 POM obtained from the projection based on actual data before audit activities, here's the detail:

Product	Last Year Projected Certified Volume (Ton)	Actual Production (June 2021 – May 2022)	Estimate Production of 12 month further (MT)
FFB IP	160,800	143,025.16	137,400
FFB MB	7,801	-	7,200
CSPO IP	33,641	29,538.03	30,228
CSPO MB	1,600	-	1,584
CSPK IP	5,873	4,751.71	5,496
CSPK MB	280	-	288

**3.8.4**

The Mill has registered as RSPO member under Wilmar International Ltd number 2-0017-05-000-00 (registered since 29 September 2004), and also registered in RSPO Palm Trace as PT Daya Labuhan Indah with License ID CB123000, and Member ID RSPO\_PO1000002132. The reporting requirements has been conducted by the Mill through RSPO Palm Trace.

**3.8.5**

DLI 2 POM has procedures that guidance for implementation of SCCS including description of personal key duty. These document observed, namely:

- SOP of FFB, CPO, PK weighbridge document No. SOP-MIL-002 revision of 8 issued on 1 February 2020, in this document mentioned that the security and weighbridge operator are responsible to ensure the source of FFB, the shipment/delivery document, as well as the seals for CPO/PK truck.
- Traceability procedure No. SOP-MILL-034, Revision 08, dated 1 February 2020 informed, the personal key on this activity is:
  - a) Logistic officer input the data of FFB certified product received and responsible in order to balancing the CPO and PK dispatch
  - b) Mill Head responsibility to ensure the stock balance and shipping of CPO and PK well implemented.In clause of 6.3 describes that in term of RSPO product shipment (CSPO/CSPK), in the weighbridge note will be attached the stamp which informed mill name, RSPO certificate number and supply chain model name. Clause of 6.6 describes that the announce to RSPO IT Platform will be done when by shipment of CSPO and CSPK. The data input conducted in every end of the month when there is no longer changes. The retention time of record keeping of supply chain documents is two (2) years.
- CPO and PK Shipment Procedure No.SOP-MILL-035, Revision 08, dated 1 February 2020 informed: point of F, the CPO and PK tank checking, the security officers checked the vehicle physical condition and to ensure the tank is empty without any other material and informed in the Vehicle Control Form document. Shipment with the RSPO status. The weighbridge officer ensure all the documents and information are complete, including the product identity (stamp) informing the certificate number of DLI.2 and the supply chain model use.

Storage tank planned to be washed minimum twice a year as mentioned in the SOP No. SOP-MILL-038, Revision 07, dated 1 February 2020. Switch over product mechanism from MB to IP model, describes as follow:

- a) Define the cutoff date of the switch over in order to ensure FFB latest day acceptance for MB model
- b) Ensure there is dedicated tank will use in empty condition to keep all the IP model status product
- c) All FFB received and production in the cutoff date will stated as MB supply chain model status
- d) Only acceptance and production at one day after the cutoff date can be stored in the dedicated storage tank

Switch over product from IP to MB model mechanism:

- a) Define the cutoff date of FFB latest day acceptance for IP supply chain model
- b) FFB and production after cutoff date stated as MB supply chain model and stored.
- c) If IP supply chain model will be shipped and claimed as IP, so the IP product left cannot be mixed with MB supply chain model product.

During this ASA-1.3 audit found that DLI-2 POM only received FFB from certified sources. So they only implemented Module Identity Preserved. Based on interview with supply chain PICs such as weighbridge operators and security, they have understood the mechanism of supply chain in IP/MB module.

**3.8.6**

The company has procedure related to Internal audit that ruled in Procedure No. SOP-GEN-015 dated on August, 18 2020. The procedure explain that internal audit that conducted once a year.

For PT Daya Labuhan Indah the last RSPO internal audit was carried out on May, 17 2022 with the result that there were 9 non-conformities. All non-conformities have been closed before audit surveillance-1.3 conducted. As for the supply

chain, there were no non-conformities during the internal audit.

**3.8.7**

The Mill has maintain the record of goods in such as in FFB Delivery Note and Balance sheet data, as well as the certified products (CSPO and CSPK), shown as follows :

Months (2021/2022)	FFB Received (MT)		Total
	Certified	Non-certified	
June	11,877.51	-	11,877.51
July	13,689.15	-	13,689.15
August	16,507.57	-	16,507.57
September	15,043.73	-	15,043.73
October	11,851.97	-	11,851.97
November	11,236.02	-	11,236.02
December	9,688.82	-	9,688.82
January	8,872.58	-	8,872.58
February	9,278.67	-	9,278.67
March	12,263.92	-	12,263.92
April	11,093.80	-	11,093.80
May	11,621.42	-	11,621.42
<b>TOTAL</b>	<b>143,025.16</b>	<b>-</b>	<b>143,025.16</b>

The SOP of handling non-conforming FFB received describe in SOP of FFB Receive (No. SOP-MIL-001 dated 1 February 2020) which explains the implementation stages of receiving FFB to ensure that the FFB received at the Mill is in accordance with procedures.

**3.8.8**

The CSPO and CSPK from the Mill were sold has met the requirements of certified product information. Supporting documents shown were contract agreement, delivery order, delivery ticket, report of loading, weighing minutes, and delivery order. Those documents cover information's of delivery date, description of product and supply chain model, product quantity, identification number, certificate number, sender's name and address of the seller. Company showed the example for selling document such as:

- Weighbridge ticket document No. DD12002134 dated March,22 2022 informed about quantity of product, supply chain model, RSPO certificate number, and others information.
- Shipping announcement No. TR-5e978154-195d informed about seller and buyer name, quantity of product, supply chain model, shipping date.
- Delivery Order No.3052114683 informed about seller, buyer name, quantity, name pf transporter etc.

**3.8.9; 3.8.10 & 3.8.11**

There are no outsourcing activities in DLI-2 POM. Transport of CPO and PK is provided by the buyer in accordance with the cooperation contract. The buyer of the certified product is PT Multimas Nabati Asahan. In this regard, the Company shows evidence of the Material Retrieval Instruction Letter. For example, Instruction Letter No. 1260077279 from PT Multimas Nabati Asahan addressed to PT DLI that inform the name of the transporter who will transport the certified product.

**3.8.12**

The Mill has maintained accurate, complete, and up to date records related RSPO Supply Chain implementation that kept at least 2 years in accordance with Mill's procedure. The Mill balancing the certified products and dispatch on a monthly basis. The summary of data 12 months previous the audit can be seen on the table below :

**CPO**

Period (2021/2022)	CPO Production (MT)			CPO Dispatch (MT)		
	Cert	Non Cert	Total	RSPO	Conventional	Total
Opening stock	296.84	-	296.84			
June	2,469.31	-	2,469.31	2,404.06	-	2,404.06
July	2,798.74	-	2,798.74	2,656.22	-	2,656.22
August	3,313.50	-	3,313.50	3,355.78	-	3,355.78
September	3,034.03	-	3,034.03	3,198.31	-	3,198.31
October	2,451.90	-	2,451.90	2,335.08	-	2,335.08
November	2,345.40	-	2,345.40	2,486.12	-	2,486.12
December	2,036.95	-	2,036.95	2,095.71	-	2,095.71
January	1,828.29	-	1,828.29	1,769.41	-	1,769.41
February	1,913.27	-	1,913.27	1,830.09	-	1,830.09
March	2,624.61	-	2,624.61	2,453.37	-	2,453.37
April	2,391.40	-	2,391.40	2,353.98	-	2,353.98
May	2,330.63	-	2,330.63	2,324.38	-	2,324.38
<b>Total</b>	<b>29,834.87</b>	<b>-</b>	<b>29,834.87</b>	<b>29,262.51</b>	<b>-</b>	<b>29,262.51</b>

**PK**

Period (2021/2022)	PK Production (MT)			PK Dispatch (MT)		
	Cert	Non Cert	Total	RSPO	Conventional	Total
Opening stock	82.86		82.86			
June	366.19	-	366.19	409.11	-	409.11
July	421.54	-	421.54	371.06	-	371.06
August	553.59	-	553.59	589.15	-	589.15
September	474.48	-	474.48	480.01	-	480.01
October	383.44	-	383.44	396.66	-	396.66
November	366.25	-	366.25	371.32	-	371.32
December	349.14	-	349.14	339.95	-	339.95
January	280.53	-	280.53	269.15	-	269.15
February	335.96	-	335.96	350.65	-	350.65
March	446.13	-	446.13	418.79	-	418.79
April	398.39	-	398.39	410.80	-	410.80
May	376.08	-	376.08	372.03	-	372.03
<b>Total</b>	<b>4,834.57</b>	<b>-</b>	<b>4,834.57</b>	<b>4,778.68</b>	<b>-</b>	<b>4,778.68</b>

**3.8.13**

Extraction rates from CPO and PK production are based on actual production data. Over the past 12 months, the extraction rate for CPO was 20.69 % and PK was 3.33 %.

**3.8.14**

Estimates for extraction rates are based on actual production of CPO and PK from the previous month. Apart from production, it is also affected by the age of the oil palm plantations. The estimation of OER is 22 % and KER is 4 %.

**3.8.15**

The certification unit implemented two model of SCCS (Identity Preserved and Mass Balance). However, until surveillance 1.3 is carried out, the unit of certification does not receive FFB from non-certified suppliers and all FFB received is RSPO certified. The results of supply chain document verification and interviews at the FFB reception location (security and weighbridge operator) revealed that FFB entering DLI 2 POM came from own plantations (Wonosari Estate, Sei Deras Estate) and PT Perkebunan Milano among others Cabang Dua Estate ( Supply base of DLI 2 POM) and Merbau Estate which RSPO certified with certificate register No. 824 502 14010.

**3.8.16**

The unit certification has been registered in IT platform palm trace RSPO <https://palmtrace.rspo.org/web/rspo/member-directory> which information as follows:

- Member Name: PT Daya Labuhan Indah
- Membership No : 2-0017-05-000-00
- Member ID: RSPO\_PO1000002132
- License ID: CB123000

Whole transaction of CSPO/CSPK has been declared in RSPO IT Platform.

For license period (08/10/2021 - May 2022), it was known that DLI 2 POM has reported sales transactions (announcements) through the RSPO IT Platform, as follows:

- CSPO volume sold: 20,648.88 MT: 74 transactions were reported, for example: Transaction ID TR-3627a6f7-8511 shipping date on March 22, 2022 and TR-4b51a2ad-e3c7 shipping date on October,18 2021 to the buyer PT Multimas Nabati Asahan.
- CSPK volume sold: 3,399.35 MT: 105 transactions were reported, for example: Transaction ID TR-5e978154-195d shipping date on March, 22 2022 and TR-60f22899-62d9 shipping date on March,31 2022 to the buyer PT Multimas Nabati Asahan.

As for shipping announcement carried out not more than 3 month after dispatch. For example : Shipping Announcement with Transaction TR-5e978154-195d with creation date on April, 29 2022 and actual dispatch on March,22 2022 based on Weighbridge ticket document No. DD12002134 dated March,22 2022.

**3.8.17**

All CSPO and CSPK are claims as IP product and the claim has been conducted in accordance with RSPO on communication and claim rules.

**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 company has a policy to respect human rights as stated in Wilmar's policy, namely the Zero Deforestation, Zero Peat, Zero Exploitation Policy which was ratified on November 2019 explaining, among other things:

1. The Company respects and supports the Universal Declaration of Human Rights by committing to uphold and promote the general declaration of human rights for all employees, contractors, indigenous and tribal peoples, local communities and anyone impact by operational activities in accordance with the overall scope of this policy
2. Respect and recognize the rights of all employees including contract workers, temporary employees and migrant workers with a commitment to ensure that the rights of everyone who works in all operational activities that fall within the scope of this policy are respected in accordance with local laws and regulations, national and international best if the legal framework has not yet been established.

Based on this explanation, the company has a policy that respects human rights.

**4.1.2**

The company has a policy to prevent violence, both sexual and other forms of action, explaining, among other things, that



the company provides a conducive work environment characterized by equality and mutual respect and if there are allegations of sexual harassment, violence and abuse, and violations of reproductive rights are proven, the company will act fairly in applying appropriate sanctions, until the perpetrator is removed from the company.

From the results of interviews with representatives of workers. That there are no complaints about violence within the company's operational scope.

In addition, from the results of the review of the complaint document, no employee or external complaints were found regarding the violence perpetrated by the company.

Based on this explanation, it can be concluded that the company has implemented a policy to prevent the prohibition of violence, both sexual and other forms of action

**Status: Comply**

**4.2**

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

**4.2.1**

The company has a complaint mechanism that respects identity protection as stated in the SOP for receiving complaints and resolving disputes with document number SOP-BNM-009 at point 6.2 explaining, among other things, that the company guarantees the confidentiality of the identity of the reporter and whistleblower by looking at the sensitivity of the issue, the scale of the impact if the issue is made public, or the risk of retaliation.

The procedure also explains that the results of the decisions taken by the Leaders are returned to the Bina Mitra Manager, if the results of the analysis are approved by the leadership, then they are forwarded to the stakeholders, but if the results of the analysis are not approved by the Leaders, they are returned to the Bina Mitra Manager to be discussed through deliberation and consensus.

The company also has a Grievance Procedure for The Implementation of Wilmar's No Deforestation, No Peat, No Exploitation (NDPE) Policy updated version 2.0 June 2019. At point 4.2 in the document, it is explained about the Protection of Human Rights Defenders, Whistleblowers, Complainants and Community Spokespersons. At point 5.1.3, also explained about complaints cases that are investigated through external mechanisms such as the RSPO complaints procedure.

**4.2.2**

From the results of interviews with the company, affected parties who are unable to read and write the company have representatives as communicators for liaison between the company and the community and other parties.

**4.2.3**

Based on the review of the procedure for receiving complaints and resolving disputes at number SOP-BNM-009, it is explained that the company provides a constructive and immediate response to receiving complaints and handling conflicts that come from stakeholders.

Based on interview with Gender Committee, labor union and Bipartite known that grievance and complaint has has been followed up by management. Grievances and complaints from the internet have been responded to by management and the update has been verified by the auditor.

**4.2.4**

In the procedure for receiving complaints and resolving disputes at number SOP-BNM-009, point 6.8 explains, among other things, that the results of decisions that have been taken by the company are submitted to stakeholders, if the results of these decisions are not approved by stakeholders, then a peaceful way is taken with assistance. The local government acts as a facilitator and at point 6.9 if it does not produce results, then legal action is taken according to the applicable law in Indonesia.

Based on this explanation, it can be concluded that the company involves a third-party mediator if necessary.

**Status: Comply**

**4.3**

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



**4.3.1**

The company has a welfare improvement program for the surrounding community. The program has been listed in the CSR Plan for 2021/2022, in which there are 7 categories that have been created based on the results of identification involving the surrounding village communities.

The program has included the timeframe, budget and location of activities planned for the provision of CSR. In general the program includes:

- General assistance to improve the economy of rural communities
- Fostering religious, social, sports life
- Health
- Education
- Infrastructure
- And the celebration of religious holidays

The company also shows examples of CSR 2021/2022 realization such as:

- Assistance for street lighting fixtures in Sei Tampang Village
- Donation of culvert materials for Wonosari Hamlet
- Assistance with heavy equipment for washing the trench, Sidorejo Hamlet, Sei Tampang Village
- Assistance with heavy equipment for road repairs in Hamlet I, Sei Tampang Village
- Assistance in washing the Tanjung Selamat Village drainage ditch
- Sewing machine assistance to Sei Tampang village women
- Goat livestock assistance to the Besitang Jaya farmer group in Teluk Besitang Hamlet
- And others.

The results of interviews with stakeholders revealed that the company in general has made efforts to improve the quality of life and the environment that is beneficial for employees and the surrounding community such as recruiting local workers, implementing CSR programs etc.

**Status: Comply**

**4.4**

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

**4.4.1**

The total management area of the certification unit is 6,226.58 ha, all of which are included in the scope of RSPO DLI 2 POM certification, including:

- PT DLI HGU 4,694.5 ha
- HGU PT Perkebunan Milano – CDE 654.33 ha
- PT DLI does not have HGU / HGU process / has cadastral 877.75 ha (divided into 2 areas of cadastral maps)

**Land Use Title**

The HGU area consist of several certificates, that are :

- PT DLI → HGU Certificate No. 1 of 1992 on a land area of 4,694.5 hectares (located in Bilah Village, Bilah Hilir District, Labuhanbatu Regency, North Sumatra Province). The validity period of the HGU certificate is until December 31, 2022.
- CDE → HGU Certificate No. 2 of 1996 on a land area of 654.33 Ha (located in Sei Nahodaris Village, Panai Tengah District, Labuhanbatu Regency, North Sumatra Province). The validity period of the HGU certificate is until August 2021.

**Total → 5,348.83 Ha**

Progress of the Extension of the CDE & PT DLI HGU (End in December 2022) and the area that does not have HGU is 877.75 Ha, as follows :

- CDE → Letter No. 03/Milano/Ext/XI/2019 dated November 21, 2019 from PT Perkebunan Milano regarding the Application for Land Measurement for the Purpose of the Extension of the HGU. Based on the results of interviews

with management, information was obtained that measurements were taken in 2020 by National Land Agency as indicated by the deposit order document with application file number 28/2020 dated March 2, 2020. However, up to the surveillance assessment 1.3, there has been no further information from National Land Agency.

- PT DLI (HGU) → Letter No. 01/DLI/Ext/XI/2019 dated November 21, 2019 from PT Daya Labuhan Indah regarding the Application for Land Measurement for the Purpose of the Extension of the HGU. Based on the results of interviews with management, information was obtained that there has been no progress/update of the HGU extension process. PT DLI's HGU will expire in December 2022.
- PT DLI (Non HGU) covering an area of 877.75 Ha → Not running since 2016. Legal staff's explanation stated that this area was planned as plasma for the application for HGU extension.

#### **Plantation Business Permit**

- PT. Daya Labuhan Indah has had a plantation permit as follows:
  - **Plantation Business Permit for Processing (IUP-P)** covers **30 tons of FFB/hour** processing capacity, based on Labuhanbatu Regent Decree No. 180/27/Huk/2012, dated 12 October 2012.
  - **Plantation Business Permit (IUP)** covers **4,694.5 ha** area and **30 tons of FFB/hour** processing capacity, based on Labuhanbatu Regent Decree No. 180/100/Huk/2013, dated 28 March 2013.
- PT. Perkebunan Milano has had a plantation permit **Plantation Business Permit (IUP)** covers **654.33 ha** area, based on Labuhanbatu Regent Decree No. 180/21/Huk/2013, dated 4 April 2013.

Meanwhile, the non-HGU area also had a plantation permit as follows:

1. **Plantation Business Permit (IUP)** covers **445.88 ha** area, based on Labuhanbatu Regent Decree No. 180/102/HUK/2014, dated 8 April 2014.
2. **Plantation Business Permit (IUP)** covers **431.87 ha** area, based on Labuhanbatu Regent Decree No. 503/327/BPPTPM-LS/2014, dated 5 September 2014.

#### **4.4.2; 4.4.4; 4.4.5**

There was no new development and planting by PT DLI until the surveillance-1.3 assessment. According to land historical record, known that concession area of Wonosari and Sei Deras Estate (PT Daya Labuhan Indah) was owned by Asam Jawa Group and Cabang Dua Estate (owned by PT Perkebunan Milano) before took over by Karya Praja Nelayan Group (KPN Group). During year 2001, PT Perkebunan Milano was took over by Wilmar International Ltd. On 2005, Wilmar also took over PT Daya Labuhan Indah. After this process, there was no record of expansion by Wilmar.

Based on interviews with representatives of Sei Bilah Village and Sei Tampang Village, it is known that PT DLI and PT Perkebunan Milano are companies that were acquired by Wilmar from the previous company. From the interviews, information was also obtained that the land acquisition process is always based on the agreement of both parties and there is no intimidation to forcibly relinquish land ownership rights.

#### **4.4.3**

There was no new development and planting by PT DLI until the surveillance-1.3 assessment. According to land historical record, known that concession area of Wonosari and Sei Deras Estate (PT Daya Labuhan Indah) was owned by Asam Jawa Group and Cabang Dua Estate (owned by PT Perkebunan Milano) before took over by Karya Praja Nelayan Group (KPN Group). During year 2001, PT Perkebunan Milano was took over by Wilmar International Ltd. On 2005, Wilmar also took over PT Daya Labuhan Indah. After this process, there was no record of expansion by Wilmar.

Based on interviews with representatives of Sei Bilah Village and Sei Tampang Village, it is known that PT DLI and PT Perkebunan Milano are companies that were acquired by Wilmar from the previous company. From the interviews, information was also obtained that the land acquisition process is always based on the agreement of both parties and there is no intimidation to forcibly relinquish land ownership rights.

From the results of interviews with relevant stakeholders, it is known that there is no customary land in the unit of certification's operational area. Based on the review of the HGU map document which has referred to the map of land rights owned, there is no information on the existence of customary rights and other rights over the legality of the land owned by the company.

**4.4.6**

The company has several policies, as well as SIA management and monitoring plan, that has some purposes. One of them to review agreement with affected parties such as acceptance of local workers if needed, CSR assistance etc. Based on interview with surrounding communities known that company has provided village with economic development program and any other CSR programs.

**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 – 4.5.8**

The results of the verification of legality documents and interviews with relevant stakeholders, it is known that there are no new development areas or no new planting in the scope of certification until the surveillance-1.3 assessment. According to land historical record, known that concession area of Wonosari and Sei Deras Estate (PT Daya Labuhan Indah) was owned by Asam Jawa Group and Cabang Dua Estate (owned by PT Perkebunan Milano) before took over by Karya Praja Nelayan Group (KPN Group). During year 2001, PT Perkebunan Milano was took over by Wilmar International Ltd. On 2005, Wilmar also took over PT Daya Labuhan Indah. After this process, there was no record of expansion by Wilmar.

Based on interviews with representatives of Sei Bilah Village and Sei Tampang Village, it is known that PT DLI and PT Perkebunan Milano are companies that were acquired by Wilmar from the previous company. From the interviews, information was also obtained that the land acquisition process is always based on the agreement of both parties and there is no intimidation to forcibly relinquish land ownership rights.

**Status: Comply**

**4.6**

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

**4.6.1; 4.6.2**

The company has procedure of land acquisition or to identify customary right (*SOP Pembebasan Lahan, Doc number: SOP-IJIN LAHAN&OPS-006*). This procedure guiding respective staff of management to ensuring all land acquisition are comply with the national or local requirement and informed to the respective stakeholder especially if any indigenous people or customary right. According to land historical record, known that concession area of Wonosari and Sei Deras Estate (PT Daya Labuhan Indah) was owned by Asam Jawa Group and Cabang Dua Estate (owned by PT Perkebunan Milano) before took over by Karya Praja Nelayan Group (KPN Group). During year 2001, PT Perkebunan Milano was took over by Wilmar International Ltd. On 2005, Wilmar also took over PT Daya Labuhan Indah. After this process, there was no record of expansion by Wilmar.

Based on interviews with representatives of Sei Bilah Village and Sei Tampang Village, it is known that PT DLI and PT Perkebunan Milano are companies that were acquired by Wilmar from the previous company. From the interviews, information was also obtained that the land acquisition process is always based on the agreement of both parties and there is no intimidation to forcibly relinquish land ownership rights.

**4.6.3**

Based on interviews with representatives of Sei Bilah Village and Sei Tampang Village, it is known that PT DLI and PT Perkebunan Milano are companies that were acquired by Wilmar from the previous company. From the interviews, information was also obtained that the land acquisition process is always based on the agreement of both parties and there is no intimidation to forcibly relinquish land ownership rights. In addition, it was also informed that land acquisition was never based on gender. Everyone, both men and women, has the same opportunity to own land.

**4.6.4**

The results of the verification of legality documents and interviews with relevant stakeholders, it is known that there are no new development areas or no new planting in the scope of certification until the surveillance-1.3 assessment. According

to land historical record, known that concession area of Wonosari and Sei Deras Estate (PT Daya Labuhan Indah) was owned by Asam Jawa Group and Cabang Dua Estate (owned by PT Perkebunan Milano) before took over by Karya Praja Nelayan Group (KPN Group). During year 2001, PT Perkebunan Milano was took over by Wilmar International Ltd. On 2005, Wilmar also took over PT Daya Labuhan Indah. After this process, there was no record of expansion by Wilmar.

The company has documented all of land compensation process. The documentation consist of Map, Negotiation result (minutes of meeting), Land Release Letter, Payment Receive was filed in estate office based on land location.

Based on interviews with representatives of Sei Bilah Village and Sei Tampang Village, it is known that PT DLI and PT Perkebunan Milano are companies that were acquired by Wilmar from the previous company. From the interviews, information was also obtained that the land acquisition process is always based on the agreement of both parties and there is no intimidation to forcibly relinquish land ownership rights. Based on the results of interviews with relevant stakeholders such as government agencies and surrounding villages, information was obtained that the entire operational area of certification unit has been compensated by the company.

**Status: Comply**

**4.7**

**Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.**

**4.7.1; 4.7.2**

company has procedure of land acquisition or to identify customary right (*SOP Pembebasan Lahan, Doc number: SOP-IJIN LAHAN&OPS-006*). This procedure guiding respective staff of management to ensuring all land acquisition are comply with the national or local requirement and informed to the respective stakeholder especially if any indigenous people or customary right.

According to land historical record, known that concession area of Wonosari and Sei Deras Estate (PT Daya Labuhan Indah) was owned by Asam Jawa Group and Cabang Dua Estate (owned by PT Perkebunan Milano) before took over by Karya Praja Nelayan Group (KPN Group). During year 2001, PT Perkebunan Milano was took over by Wilmar International Ltd. On 2005, Wilmar also took over PT Daya Labuhan Indah. Based on document verification and interview with related stakeholder (village representatives) known that there was no new expansion after this concession took over by Wilmar International Ltd.

**4.7.3**

The results of the verification of legality documents and interviews with relevant stakeholders, it is known that there are no new development areas or no new planting in the scope of certification. Based on the results of interviews with representatives of surrounding village known that the land acquisition process is always based on the agreement of both parties and there is no intimidation to forcibly relinquish land ownership rights.

From the results of the interview, information was also obtained that one of the benefits of the existence of plantations is provides access to employment, CSR assistance, participate in local business development etc.

**Status: Comply**

**4.8**

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

**4.8.1; 4.8.2; 4.8.3; 4.8.4**

Based on the verification of incoming letter documents, interviews with management, the National Land Agency and representatives of surrounding villages, it was found that there were no land disputes or conflicts with the community. In addition, the results of field observations to the company's operational areas also showed no indications of conflicts or disputes with the community.

Based on the area statement data, it is known that there is an area of 101.04 ha which is declared as an occupied area. The occupation has occurred since the beginning of land clearing and before the Wilmar Group took over. The actual condition of the land is Palm Oil planted by occupant.

The company has shown evidence of recorded agreements with the community regarding the occupied areas. Recorded evidence consists of:

- Agreement between PT DLI and the community on February 28, 2014 for the completion of an area of 101.04 Ha in Sei Deras Estate. The essence of the agreement is to maintain conducive conditions in the operations of both parties. There is also attendance list of meeting participants & photos.
- Agreement between PT DLI and the community on March 11, 2014 for the completion of an area of 101.04 Ha in Sei Deras Estate. The essence of the agreement is that both parties will continue to carry out their activities as before. This activity was attended by farmers, village heads, TNI and company representatives. There is also attendance list of meeting participants & photos.

Based on the results of interviews with representatives of surrounding villages, it is known that until surveillance-1.3 assessment, there is no conflict related to the occupied land. Occupied land is treated the same as the agreement. The occupied area has also been reported to the National Land Agency through HGU utilization reports which are routinely reported every year.

**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, 5.1.2, 5.1.3, 5.1.4, 5.1.5, 5.1.6**

Based on the results of interviews with company management, it is known that there are no FFB suppliers from Independent Smallholders or Plasma Smallholders, FFB sources come from nucleus plantations and other plantations within the Wilmar group.

**5.1.7**

The unit of certification shows Certificate of Test Results Number 510.3/212/Dagind-Met/KHP/10/2021 for electronic bridge scales dated October 29, 2021, valid until October 29, 2022. The inspection is carried out by the UPTD Metrology Legal, Labuhanbatu Regency.

**5.1.8, 5.1.9**

Based on the results of interviews with company management, it is known that there are no FFB suppliers from Independent Smallholders or Plasma Smallholders, FFB sources come from nucleus plantations and other plantations within the Wilmar group. Based on the results of interviews with representatives of the surrounding community, it is known that until now there are no farmers around the company who wish to participate in RSPO certification activities.

**Status: Comply**

**5.2**

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

**5.2.1, 5.2.2, 5.2.3, 5.2.4, 5.2.5**

There are no plasma smallholders or independent smallholders and out growers who supply FFB to DLI 2 POM. Based on the results of interviews with local community representatives, it is known that until now there are no farmers around the company who wish to participate in RSPO certification activities.

**Status: Comply**

**PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS**

**6.1**

**Any form of discrimination is prohibited.**



**6.1.1**

The company has a non-discrimination and equal opportunity policy which is stated in the Human Rights Framework policy which explains, among others:

The company is committed to providing equal opportunities to all employees, the company will not discriminate in hiring, promotion or retirement, and the company ensures a diverse and representative workforce profile through the promotion of equal employment.

And to implement this policy, the company has several approaches, including:

1. The process of recruiting human resources based on merit
2. Internal education improvement training for staff
3. Post-arrival orientation
4. Non-discrimination training
5. Pregnancy protection
6. In Indonesia, increasing the number of permanent workers

Based on this explanation, it can be concluded that the company has a policy of non-discrimination and equality of opportunity for all employees in the company.

**6.1.2**

The company does not discriminate or levy recruitment fees to workers at the PT Daya Labuhan Indah company, this is evidenced from interviews with representatives of workers at the Estate workshop and interviews with the village head Sei Tampak that the company does not discriminate or collect recruitment fees.

**6.1.3**

The company has made a recruitment selection on the basis of skills, abilities, and quality as evidenced by examples of requirements listed in job vacancies published on 27 December 2018 including:

1. Age between 18-30 years old
2. In good health (proven by a medical test at the clinic during the selection process)
3. Minimum education equivalent
4. etc

In addition, the company also has an evaluation result document for a probationary period which includes the willingness to learn, work quality, work quantity, timeliness in completing tasks, willingness to work overtime, discipline etc.

Based on this explanation, it can be concluded that the company selects recruitment or promotion in accordance with the provisions set by the company.

Based on the results of document verification and interviews with the company, it is known that there will be no new employee recruitment in 2021-2022

**6.1.4**

The company does not carry out pregnancy tests to be a discriminatory measure, based on interviews with company management, pregnancy tests are only carried out to officers dealing with pesticide materials.

**6.1.5**

The company has a gender committee with the aim of raising awareness, identifying and resolving existing problems, as well as providing opportunities and enhancements for women. Structure of gender committee consist of male and female worker.

The following is the structure of the gender committee in the company:

1. Protector consists of 3 people
2. The chairman consists of 3 people
3. Secretary consists of 3 people
4. The counseling and socialization section consists of 12 people
5. Consultation section consists of 10 people
6. The protection, prevention and prosecution section consists of 9 people



The company has also implemented gender committee policy socialization on March 20, 2021 to employees in the company. Based on the organizational structure, it can be seen that the company already has a gender committee whose members have represented both male and female gender.

**6.1.6**

The company has paid equal wages to workers, taking into account ability, performance, expertise, years of service and other factors as the basis for wages. So that the payment of wages given is in accordance with the load/task/type of work of each. For example, harvesting workers with Employee Number DB/WB/0217/1892 (male) and maintenance workers with Employee Number DB/WS/1017/2126 (female) who get wages in June 2022 whose value is above the minimum wage, but with an amount which differ based on years of service, ability, attendance and work performance (wage structure and scale).

From the results of interviews with representatives of trade unions, it is known that the certification unit already has a pay scale structure for each worker based on position, class, work performance, and not based on differences in gender or origin. For example, the lowest wage scale is for permanent workers in class 2A and the highest wages are for permanent workers in class 2D.

Based on this explanation, it can be concluded that the company has paid equal wages to workers by considering the basic factors of wages

	<b>Status: Comply</b>	
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**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 company has a Collective Labor Agreement (PKB) document valid for the period 2021-2023 and the PKB has been approved by the Labuhanbatu Regency Manpower Office with number 560/0212/DTK-4/2022 between the trade union/labor union of PT Daya Luhan Indah and PT Daya Labuhan Indah company.

The Collective Labor Agreement regulates, among other things, the scope of application of the collective work agreement, reciprocal obligations and rights, recognition of trade unions/labor unions, general obligations, work performance appraisal, job transfers, promotions, working hours, company working hours, rest, days off, holidays and so on.

Based on the review of the PKB document, it has been submitted to each employee with proof of receipt that has been signed. Based on interview with workers and labor union, known that company has paid wages accordance with applicable regulation.

**6.2.2**

Based on the verification documents, it is known that the company already has a list of workers, work agreements and related documents that regulate the details of wages and work requirements, as well as salary details documents that provide accurate information on compensation. Based on interview with workers such as harvester, spraying workers, mill workers known that workers have known about the right and obligation according to CLA.

The company has documents that regulate the determination of fines/sanctions, for example the provision of harvest fines imposed on workers when ripe bunches on the tree are not harvested, and the amount of the sanctions is Rp. 5,000/bunch which will later be deducted from the harvest/load premium and will not reduce the basic wage.

Based on the results of interviews with workers that these workers already know about the fine for harvesting FFB that does not comply with the established criteria and the fine is done not deducting from the basic wage but from the company's premium.

From a review of employee salary slips for the period of May 2022, it can be seen that there are no harvest deductions/fines from employee wages.

**6.2.3**

The company has established evidence of legal compliance contained in the CLA, including:

1. Working overtime

- The implementation of overtime work must be accompanied by an Overtime Agreement from the entrepreneur and signed by the worker/labor, except in urgent cases.
- Workers/laborers who work overtime without prior orders or approval from their superiors are not entitled to overtime pay, except in urgent cases they can be accounted for

2. Annual rest (leave)

- Employees/workers who have worked for 12 (twelve) months continuously, are entitled to annual rest/leave for 12 (twelve) working days
- Workers/laborer's who will take the entitlement to the annual leave must apply in advance no later than 7 (seven) days prior to taking the leave, except in urgent cases.
- The implementation of leave can be carried out after approval from the company leadership

3. Sick leave

- Employees/workers/laborers can be given permission not to come to work or leave work with full wage payments if the employee/worker/laborer is sick as evidenced by a valid illness certificate from a health officer, company doctor or specialist doctor/doctor at a referral hospital.
- For employees who receive a leave of absence for more than 3 (three) days for outpatient treatment issued by a doctor other than the company doctor, they must re-consult the company doctor on the first day

4. Holidays

Holidays that are recognized as valid by the company are official holidays set by the government for each year, or days that are determined by the company as holidays/off for employees/workers/laborers.

**6.2.4**

The company has provided adequate housing facilities, the following are data on facilities and facilities owned by the company for the period June 2022, for example for the Sei Deras Estate, Division I , including:

- G-6 Permanent 4 units
- G-10 Permanent 13 units
- G-1 Permanent 1 unit
- G-2 Permanent 2
- Workshop 1 unit
- Mosque 1 unit
- Permanent Clinic 1 unit
- 1 unit daycare center
- 1 unit sterile bathroom
- Kindergarten school 1 unit
- Permanent Command Post 1 unit
- Water Depot 1 unit
- Church 1 unit
- 1 unit employee hall
- 1 unit generator house

Based on the results of field visits, it is known that the company has provided facilities for employees, ranging from housing, worship facilities, sanitation facilities including lighting facilities. Based on this explanation, the company has provided adequate housing and facilities to workers.

**6.2.5**

The company has made it easier for workers and their families to obtain 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.

Based on interviews with residents in employee housing estates, trade unions and the gender committee, it is known that workers do not have difficulty in obtaining food sources because the company has provided a cooperative that sells daily necessities, and the existence of vegetable sellers is given access to sell at home. In addition, workers can buy these necessities to markets around the company area with easier access.

**6.2.6**

The company has calculated the In kind Benefit for all workers set in 2022 for the January – December 2021 period, including:

1. Lifetime House
2. Annual taxes, fees, levies and house insurance
3. Annual cost of maintenance
4. Annual electricity consumption cost
5. Annual water consumption cost
6. Bus Cost
7. Childcare cost
8. Cost Education
9. Cost Healthy
10. Cost Family Gathering

For example, the calculation for Sei Deras Estate In Kind benefit is 1,210,506/month, minimum wage 3,284,500/month, holiday allowance 273,708/month so that the total Prevailing Wage earned for each month is Rp. 4,768,714. Based on the results of the document review, the DLW calculation has been carried out in an actual and rational manner at the company's location.

**6.2.7**

Based on the study of workers' demographic documents for the period of May 2022, it can be obtained that all employees working in the company are permanent employees, as well as from interviews with company management that all employees working in the company are permanent employees.

**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 company has a policy that recognizes freedom of association as stated in the document number SOP-HRD-008, explaining, among other things:

- HRD Manager along with plantation and mill leaders socialize company policy regarding the freedom for employees to join and form a worker's union and convey the benefits of workers union to employees.
- On the basis of the employee's desire to form a trade/labor union organization, if necessary, the HRD Manager along with the management of the plantations and mills assists in providing facilities and infrastructure in the formation of a trade union organization.
- The HRD Manager proposes the establishment of a bipartite institution consisting of company representatives and representatives from trade/labor union organizations, to the management and the manpower office. The company provides an office for the operational activities of the trade union organization to the management
- Based on the summary of the explanation, it can be concluded that the company supports and recognizes the freedom of trade unions.

**6.3.2**

The company has documented the minutes of the meeting between the certification unit and the labor union, including the meeting held on December 28, 2022 and attended by 17 people from the company and representatives of the trade union, while the discussions included regular meeting schedules, membership of trade unions/labor, wearing standard helmets, work equipment, BPJS balance, sports facilities, personal protective equipment, and covid-19 prevention. Based on this explanation, it can be concluded that the company has documented its activities with the union.

**6.3.3**

The company does not interfere in the selection or organization of trade union activities, this is evidenced by the results of interviews with workers and trade union representatives who stated that in the process of selecting/making decisions and planning activities, members provided input/aspirations to their respective representatives to make elections/ decision making and there is no management holding a staff/managerial position (assistant and above). The employee who currently serves as the Chairman of the Trade Union is an employee in the factory and plantation, so there will be no conflict of interest that occurs with the company because there are no workers who have the authority as decision makers (staff and above). This explanation reinforces the fact that management does not interfere directly/indirectly in the decision-making and activities of the union.

Based on interviews with four trade union representatives who explained 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 company provides freedom for workers to express their opinions and also the company does not provide any intervention related to trade union activities.

**Status: Comply**

**6.4**

**Children are not employed or exploited.**

**6.4.1**

The company already has a policy related to child protection, which explains, among other things:

- The company ensures that all jobs directly run by Wilmar comply with a no child labor policy.
- The company takes all necessary steps to protect children from all forms of exploitation and abuse
- The company provides all children of employees and workers with the best possible opportunities to access basic and secondary education
- Respond quickly and appropriately to all forms of child exploitation and child abuse when they are reported to the company.

From the results of interviews with the Sei Tampang village head as well as with contractor representatives, there are no child laborers in the company.

Based on this explanation, it can be concluded that the company already has a child protection policy.

**6.4.2**

The company has shown examples of job vacancies addressed to the Village Head of Kampung Bilah with job vacancy number 013/DLI/KSD/Ext/VII/2021 while the requirement for the job vacancy is that the candidate must be at least 18 years old.

From the observation of the employee list for factories and plantations for the period of April and May 2022, there were no employees under the age of 18 working at the company PT Daya Labuhan Indah.

Based on this explanation, employees who work at PT Daya Labuhan Indah are all over 18 years old.

**6.4.3**

From the results of the document review for the period of May 2022, there are no young people working at the PT Daya Labuhan Indah company.

**6.4.4**

The company has disseminated the no child labor policy, which was carried out on March 17, 2022 which was attended by the company's staff and leaders and the village head of Sei Nahodaris. Based on this explanation, the company already has a policy of prohibiting child labor and has carried out socialization to relevant stakeholders.

**Status: Comply**

**6.5**

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

**6.5.1**

The company has a policy to prevent violence, both sexual and other forms of action, explaining, among other things, that the company provides a conducive work environment characterized by equality and mutual respect and if there are allegations of sexual harassment, violence and abuse, and violations of reproductive rights are proven, the company will act fairly in applying appropriate sanctions, until the perpetrator is removed from the company. Based on the summary of the explanation, it can be concluded that the company has a policy to prevent sexual violence and harassment.

**6.5.2**

The company has a policy to protect the reproductive rights of workers, especially women, which is stated in the policy on sexual harassment, violence and reproductive rights which explains, among others:

1. Decide freely and responsibly regarding the number, spacing and timing of their children's birth
2. To make decisions regarding reproduction free from discrimination, coercion and violence

Based on this explanation, it can be concluded that the company protects the reproductive rights of workers, especially women.

**6.5.3**

The company has identified the needs assessment of young mothers compiled by management on June 2, 2022 explaining, among others:

- o post-pregnancy identification by means of antenatal care, pregnancy consultation, giving vitamins, participating in *posyandu* activities, and ultrasound examination (ultrasonography)
- o During delivery, identify by preparing a change of clothes, preparing flip-flops and socks, preparing sanitary napkins, preparing baby needs, coming to the clinic and being picked up
- o After giving birth, identification by means of mental preparation, facilitating breastfeeding, caring for childbirth wounds, giving baby immunizations, baby care and so on

Based on this explanation, it can be concluded that the management has assessed the needs of young mothers.

**6.5.4**

The company has a complaint mechanism that respects identity protection as stated in the SOP for receiving complaints and resolving disputes with document number SOP-BNM-009 at point 6.2 explaining, among other things, that the company guarantees the confidentiality of the identity of the reporter and whistleblower by looking at the sensitivity of the issue, the scale of the impact if the issue is made public, or the risk of retaliation.

Based on this explanation, it can be concluded that the company protects the identity of the reporter.

	<b>Status: Comply</b>	
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**6.6**

**No forms of forced or trafficked labour are used.**

**6.6.1**

Based on document review, field observations, and interviews with workers and stakeholders (including labor unions), it is known that there are no migrant workers, including forced labor and illegal labor. Recruitment is carried out according to company procedures, such as no payment in the recruitment process and no holding of identity documents. All workers have an employment agreement that explains the obligations and rights of workers, and other provisions. They work under contracts and work orders. Based on field observations and interviews with workers' representatives at the Factory, it was found that there was no forced labor and no coercion from time to time and wage deductions.

**6.6.2**

The company has a cooperation agreement for outsourcing workers who work at PT Daya Labuhan Indah which is stated in the work agreement number 032/PKS/CMP/II/2022 which has been agreed by both parties between PT Daya Labuhan Indah and PT Citra Maju Perkasa as for the contract agreement it consists of:

- Duties and Scope of Manpower Provision
- Labor Status
- Term of Agreement
- Evaluation and Report

- Labor Qualifications and Criteria
- First Party Support
- Labor Cost
- Payment Terms and Annual Leave Entitlements to Workers
- Imposition of Payments to Labor
- Confidentiality
- Labor Quality
- Etc.

From the results of interviews with the labor provider, that employees who become workers from PT Citra Maju Perkasa have been given their rights in accordance with applicable labor regulations, for example wages, BPJS benefits, etc.

**Status: Comply**

**6.7**

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

**6.7.1**

The company already has a person in charge of OHS in the form of an OHS Committee organization, including:

- The company indicated the OHS organization for PT Daya Labuhan Indah in accordance with the Decree of the Manpower Office No. KEP.131.a.7/P2K3/WIL-IV/DTK/SU/2022 dated March 31, 2022 regarding the Ratification of P2K3 PT Daya Labuhan Indah with the secretary of the OHS Committee named Andi Syahputra, Yudo Martita and Rio Triputra. P2K3 secretarial licenses include:
  - Decision Letter of Appointment named Rio Triputra No. 5/1300/AS.02.04/X/2021 dated October 15, 2021 with a validity period of 3 years.
  - Yudo Martita already has an OHS General Expert Madya competency certificate from BNSP No. 78000,3152,0004315,2021 valid for 4 years.
  - Andi Syahputra refers to the statement letter from the OHS Service Company No. 344/DIP-Sket/II/2021 dated 15 December 2020 which informs that the license, Appointment Decree and certificate are still in the process of being issued, this is also accompanied by BNSP Circular Number 1118/BNSP/VII/2021 dated 26 July 2021 regarding temporary suspension delivery of blank certificates.
- The company shows the Manpower Decree No. KEP.250.a-7/P2K3/WIL-IV/DTK/SU/2022 dated June 2, 2022 concerning Ratification of P2K3 PT Perkebunan Milano Cabang Dua with P2K3 secretary named Ali Raseden Daulay, according to the Appointment Decree No. 5/11442/AS.02.04/IX/2021 dated 30 September 2021 which is valid for 3 years.

The OHS Committee has held regular meetings as evidenced by the recording of the meeting, for example the Minutes of the OHS Committee DLI dated March 26, 2022 and the Minutes of the OHS Committee KCD dated April 26, 2022. The meeting briefly discussed the following:

- Review outstanding audit cross Working Days/Inspections for February 2022
- Weekday Audit/ Internal inspection March 2022
- Report accident work
- Existing issues and training programs for March 2022.
- OHS performance related to workplace accidents in April 2022

**6.7.2**

The company demonstrates procedures for prevention and handling of emergencies such as fire incidents and others (listed in document No. PRO – GEN – 023 Revision 4, dated November 05, 2020). The procedure describes the coping mechanism as follows: Plantation and Forest Fires, Factory Fire and Residential Fire.

The results of the field visit found that the company had provided a first aid kit in every building and completed a first aid bag for workers in the field brought by the foreman, the results of the interview with the foreman revealed that the officer



could briefly explain the procedures for handling first aid kits and the functions and uses of the contents of the first aid bag. In addition, in the Mill and Estate area there are warnings of evacuation routes and gathering points.

The Company shows the Emergency Response Organizational Structure for Mill and Estate, as follows:

- The organizational structure of the TPKD PKS DLI-2 on January 1, 2021 consists of the Chair, Secretary, Coordinator, Emergency Management Task Force, Communications Task Force, Rescue Task Force, Security Task Force, Paramedic Task Force, Inventory Task Force, and Repair and Recovery Task Force.
- The organizational structure of the TPKD PT Perkebunan Milano Cabang Dua Estate dated November 19, 2018 consists of the Chair, Secretary, Coordinator, Emergency Management Task Force, Communications Task Force, Rescue Task Force, Security Task Force, Paramedic Task Force, Inventory Task Force, and Repair and Recovery Task Force.
- The organizational structure of PT DLI KSD's TPKD on April 1, 2022 consists of the Chair, Secretary, Coordinator, Emergency Management Task Force, Communications Task Force, Rescue Task Force, Security Task Force, Paramedic Task Force, Inventory Task Force, and Repair and Recovery Task Force.
- The organizational structure of PT DLI KWS TPKD consists of the Chair, Secretary, Coordinator, Emergency Management Task Force, Communications Task Force, Rescue Task Force, Security Task Force, Paramedic Task Force, Inventory Task Force, and Repair and Recovery Task Force.

Verification results on OFI previous assessments, based on the simulation of hydrant number 04 in the boiler area, it is known that the hydrant is functioning normally.”

### 6.7.3

The company shows SOP No. SOP-GEN-025 dated February 1, 2015 which contains information related to: Identification and Procurement of PPE and Distribution of PPE.

Based on the results of field observations and review of PPE stock documents, for example at Sei Deras Estate, PPE stocks are available including:

- Safety Boots 88 pairs
- Anti-Pollution Mask 107 pcs
- Safety Helmet 10 pcs
- Glasses 16 pcs

OFI verification results on previous assessments, based on the results of field observations and interviews with workers at the Mill and Estate, it is known that workers have used PPE as required in the IBPR document and it was conveyed that all PPE is provided by the company and will be replaced if the PPE is no longer feasible or no longer provides adequate protection. maximum including PPE with a short lifetime.

verification results on OFI previous assessments, based on the simulation of hydrant number 04 in the boiler area, it is known that the hydrant is functioning normally.” The results of field observations also found that the company provides sanitation facilities for workers who use pesticides so that workers can take off their PPE, clean themselves and put on their personal clothes in a functioning condition and in adequate numbers.

### 6.7.4

Based on a review of the April 2022 worker list document and proof of payment of BPJS Health and BPJS Employment for the same period, it is known that the company has registered and paid all its workers in the BPJS Health and BPJS Employment programs, which consist of Work Accident Insurance (JKK), Death Insurance (JKM), Old Age Security (JHT) and Pension Guarantee via Bank Transfer, with proof of payment, for example:

- (PT DLI) Proof of BPJS Employment payment for the period April 2022 which has been paid for as many as 837 workers with payment code 2205 0036 1738 via bank transfer.
- (PT DLI) Proof of payment of BPJS Health for the period April 2022 which has been paid for as many as 837 workers on April 8, 2022 via bank transfer.
- (PT Perkebunan Milano) Proof of payment of BPJS Employment in May 2022 for 126 workers via bank transfer.
- (PT Perkebunan Milano) Proof of payment of BPJS Employee Health for the month of May for 126 participants and

265 dependents via bank transfer.

Based on the results of verification of work accident records, for example, for the period January - March 2022, it is known that there were no work accidents so there is no record of BPJS claims. From the results of interviews with plantation and factory workers, it is known that the company has provided health insurance for workers and their families (wife and children) and employment insurance for all workers.

**6.7.5**

The company shows a record of work accidents using LTA, for example the period January – March 2022 as follows:

Description	KWS	KSD	Mill	KCD
LTA	11,4	18,08	0	0
SR	20,2	37,96	0	0
FR	12,3	21,69	0	0

Companies can also show records of investigations into work accidents that occur, for example as follows:

- General Incident Investigation Report dated September 29, 2021 regarding Kernel Operator work accidents which provides chronology and analysis of the causes of accidents and corrective and preventive actions.
- A Work Accident Investigation Report and Suggestions for Correction dated April 6, 2022 related to harvester work accidents at KCD which provide chronological information and analysis of the causes of accidents and corrective and preventive actions.

**Status: Comply**

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

**7.1**

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

**7.1.1**

The unit of certification has committed to implement integrated pest management (IPM) which presented in several document for example Document No. SOP-EST-013 (Rev. 01) dated 01 February 2015 about pest and diseases detection and census and No. SOP-EST-018 (Rev. 03) dated 01 September 2016 about pests and diseases management control. The estate management has a program of integrated pest management and its realization such as:

- The results of the January 2022 KCD Rat Pest Census found that the attack rate was between 1.9 - 2.44% which was below the control threshold.
- The results of the Sei Deras Estate Division 2 Census in March 2022 found termite attacks between 0.09 – 0.27%
- The results of the Sei Deras Estate Division 1 Census in March 2022 found rat attacks between 1.23 – 3.27%
- The results of the Sei Deras Estate Division 1 Census in March 2022 found Ganoderma attacks between 1.17 – 16.69%
- The Barn Owl Box Census, for example KWS Division 2 in June 2022, contained 9 Barn Owl Box with empty conditions.
- The results of the Needle Worm Census Division 1 KWS in May 2022 found signs of a caterpillar attack with severe criteria (20 & 23%).

Based on filed observation to Wonosari Estate and Cabang Dua Estate known the actual condition ia accordance with the document.

**7.1.2**

Based on the results of the document review and field observations, it is known that the company uses beneficial plants (*Turnera Subulata*) and owls (*Tyto Alba*), both of which are not invasive species based on Minister of Environment and

Forestry Regulation no. 94 year 2016.

**7.1.3**

There is no use of fire for pest management purposes. Estate management prefer to control pest population by biological method instead of chemicals. This matter verified through field observation which shows that there were no indication of fire activities in estate operational areas.

**Status: Comply**

**7.2**

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

**7.2.1**

The company already has a Letter of Recommendation for the Storage/Use of Pesticides No. 361.a-7/WIL-IV/DTK/SU/2022 dated 16 June 2022 from the North Sumatra Provincial Manpower Office for the following pesticides:

1	Glinat 200SL	13	Sevine 85 AS	25	Spreader
2	Glimax 40 SL	14	Amcothene 75 SP	26	Feromonas
3	Supremo 480 SL	15	Manthene 75 SP	27	Racumin 0,0375 BB
4	Basta 150 SL	16	Regent 50 SC	28	Marshal 4 EC
5	Starlon 665 EC	17	Cynoff 25 UL	29	Kenlly 20 WG
6	Lindomin 865 SL	18	Decis 25 EC	30	Chepat 75 SP
7	Abolisi 865 SL	19	Dithane-M45 80 WP	31	Daimex 80 WP
8	Penalty 50 SC	20	Raban 80 WP	32	Inteam
9	Sime RB Pheromone 1000 SL	21	BM Zebco (80 WP)	33	Kencis 260 EC
10	Bravo 50 EC	22	Cozeb 80 WP	34	Amistartop 325 SC
11	Capture 50 EC	23	Garlon 670 EC	35	Icon
12	Dipel SC	24	Agristik 400 L		

All of the pesticides mentioned above are selective types of pesticides to deal with weeds or pests that are targeted. in addition, all of them are not included in the World Health Organization (WHO) Class 1A or 1B list or included in the Stockholm or Rotterdam Conventions, and paraquat.

**7.2.2**

The company shows records of pesticide use, for example the use of Kenly brand pesticides at KCD in 2022 as follows:

- Active Ingredients: Metsulfuron Methyl 20%
- LD50: >5,000 mg/kg
- Application Area: 1,936.52 Ha
- Active Ingredients/ Ha: 0,0015 L/Ha
- Total Applications: 14.8 L

**7.2.3**

As part of the pesticide reduction plan and the implementation of Integrated Pest Management, the company has used biological pest control with natural enemies of pests (*tyto alba*) and beneficial plants (*turnera subulata*).

**7.2.4**

The results of the study of the list of pesticide use documents, there is the use of pesticides aimed at controlling caterpillar pests in KWS, this is in line with census records, for example, the results of the Division 1 Caterpillar Census in May 2022 found signs of caterpillar attacks with severe criteria (20 & 23%). So it can be concluded that there is no use of pesticides with a prophylactic purpose in which the use of pesticides is based on the results of the census and observations.

**7.2.5**

Based on the results of field observations in the pesticide storage warehouse and the pesticide use list, there was no use of pesticides that were included in the World Health Organization (WHO) Class 1A or 1B list or included in the Stockholm or Rotterdam Conventions, as well as paraquat.

#### **7.2.6**

In order to maintain the competence of workers handling pesticides, the company conducts regular training which is indicated by documentation, for example:

- Documentation of the CDE Manuring and Spraying training on March 10, 2022, which was attended by 20 participants.
- Documentation of training on understanding of pest and disease management techniques in oil palm plantations on 28 May 2022 by R&D Staff to 19 participants.
- Documentation of Pest Disease Census and Fruit Census training on June 10, 2022 by R&D Staff to 17 workers.

#### **7.2.7**

The results of field observations of chemical storage warehouses on Cabang Dua Estate, Wonosari Estate & Sei Deras Estate, it is known that chemical storage warehouses are in accordance with Government Regulation number 74 of 2001 concerning the Management of Hazardous and Toxic Materials. Among them are equipped with hazard symbols, ventilation, adequate lighting, emergency response facilities and infrastructure, process flow for receiving and releasing chemicals, MSDS, storage of pesticides are grouped by type and available secondary containment which is clean.

#### **7.2.8**

Procedure of used pesticide containers management is presented in document No. SOP-EST-020 (Rev. 02) dated 01 February 2015 while procedure on hazardous materials handling is presented in document No. SOP-GEN-005 (Rev. 3) dated 01 October 2015. Procedure mentioned that used pesticide containers shall be delivered and placed on the permitted Hazardous Waste Store, and prohibit to be use for household purposes, unless reuse for related pesticide application activities. Used containers has been managed as refers to PP No. 101 in 2014. Permit of Hazardous Waste Store for KCD; KWS and DLI-2 POM are shows to the Labuhanbatu District Decree, Sumatera Utara No. 503.660.3/140/DPMPTSP-BP2MNP/2019 dated 26 February 2019 and Decree No. 503.660.3/214/DPMPTSP-BP2MNP/2019 dated 01 April 2019, No 503.660.3/409/DPMPTSP-BP2MNP/2021 dated 31 May 2021 respectively. Third permits were valid for five years.

Pesticide waste management has been carried out in accordance with procedures and regulations by transporting it by a licensed transporter, for example:

- Chemical Packaging (including Pesticide packaging) at KWS & KSD as much as 928 kg which was handed over to hazardous waste carrier licensed PT Veronica Tanaga on April 7, 2022 with KLHK-1651474898 manifest with a volume of 0.928 tons BK 8248 FC vehicle with transport permit No SK.00611 /AJ.309/1/DJPD/2018.
- Chemical Packaging (including Pesticide packaging) in KCD as much as 28.34 kg which was handed over to licensed hazardous waste carrier PT Veronica Tanaga on April 7, 2022 with the manifest KLHK-16524720907 with a volume of 0.0283 tons of vehicles BK 8248 FC with transport permit No SK.00611 /AJ.309/1/DJPD/2018.

Referring to OFI's assessment of ASA 1.2 in 2021, the auditor team conducted field visits to operational areas and supporting areas consisting of warehousing, housing and other areas in Sei Deras Estate, Wonosari Estate, and Cabang Dua Estate. From the results of the field visit, it was found that the used pesticide packages had been placed according to the procedures they had and were not found in areas that were not permitted.

#### **7.2.9**

Based on the results of interviews with management representatives, it is known that the company does not apply pesticides by air.

#### **7.2.10**

The company shows records of Health checks including:

- The results of the Cholinesterase examination of PT Perkebunan Milano in 2022 from Sri Pamela Torgamba Hospital on March 18, 2022 on 15 workers (Spraying, Manuring, Tractor Operators, Warehouse Officers and Foreman) with all normal results.
- The results of the Cholinesterase examination of PT Daya Labuhan Indah Sei Deras in 2022 from Sri Pamela Torgamba Hospital on March 18, 2022 for 26 workers with all normal results.
- The results of the Cholinesterase examination of PT Daya Labuhan Indah Wonosari in 2022 from Sri Pamela Torgamba Hospital on March 18, 2022 for 32 workers with all normal results.

Based on the results of the interview, it was conveyed that periodic (general) health checks for all workers and spirometry checks could not be carried out due to Covid-19 constraints.

**7.2.11**

Based on the results of interviews with female workers, it was conveyed that there were 2 spray workers who had just given birth and these workers had been transferred to loose fruit picker.

In addition, the company shows proof of mutation, for example letter no. 028/DLI/KSD/INT/IV/2022 dated April 21, 2022 regarding job transfers for workers who are positively pregnant on the results of pregnancy checks for employees of fertilization and spraying Divisions 1 and 2 KSD dated April 20, 2022

The company also shows monitoring of pregnant women and nursing mothers, for example the document of the List of Workers who are breastfeeding in the KWS in 2022 with a total of 9 workers.

Thus, it is concluded that the company has ensured that no pesticide-related work is carried out by pregnant or lactating women, or people with medical limitations and that they are offered other equivalent work alternatives.

**Status: Comply**

**7.3**

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

**7.3.1**

All waste has identified and managed in accordance with management plan. Result of field visit to Mill, it is known that mill effluent was processed on effluent pond until it comply with standard before being discharge to water bodies; empty fruit bunches are collected in the empty bunch area then burned using an EFB burning stove, and a small portion is applied back to the land, shell and fiber are utilized as a renewable fuel for boiler, chemical containers including pesticide containers have been stored at licensed scheduled waste storage. Regarding hazardous waste disposal, PT Daya Labuhan Indah and PT Milano has collaborated with PT Veronica Tanaga (licensed collector by decree of environmental minister). Meanwhile, field visit on workers housing on KCD, KWS, and KSD found that domestic waste (organic / inorganic) are disposed by zero burning method to domestic landfill areas. The auditor team also visited landfill areas in KWS, Block 114, Division 1 and KCD, Block 044, Division 1. It was known that domestic waste been separated to the organic waste and non-organic waste.

Based on the results of the field visit to the Empty Bunch Area, it was found that the condition of empty bunches was piling up, this was due to the inoperability of the furnace in the POM. The management unit shows Budget / Capex 2022 where one of the plans in it is to build an Incinerator with a capacity of 30 tons. The Certification Unit has the opportunity to ensure that the process of procurement/construction of new incinerators for the management of empty bunches can be carried out so that waste management of empty bunches can be carried out according to the procedures and waste management plans that they have. **OFI**

**7.3.2, 7.3.3**

The management unit can show documentation of waste management according to the results of its identification, for example sending hazardous waste to licensed transporters on April 7, 2022 (KWS, KCD, Wonosari POM). Recording the stock of hazardous waste, where until June 2022 the stock of hazardous waste is as follows:



Type of Hazardous waste	Location		
	KWS	KCD	POM
Used Oil	670 ltr	88 ltr	108 ltr
Used battery	18 kg	2 pcs	-
Chemical Packaging	99 kg	16 pcs	131 pcs
Used filter	75 kg	14 pcs	52 pcs
Used lamp	1 kg	-	5 pcs
Infectious waste	2 kg	1 kg	-
Cartridge	-	10 pcs	-

Hazardous Waste Management Report has been submitted to relevant agencies such as the Labuhanbatu Regency Environment Agency on 29 April 2022 and the Ministry of Environment through SIMPEL for the period 1 January 2022 – 31 March 2022 with ID TTE 1652714710-3306.

The resulting fiber and shell are used as boiler fuel. The amount of renewable fuels includes the use of Fiber during 2021 as much as 31.006 tons of Fiber and 8,745 tons of Shell. Meanwhile, POME waste is applied to land with an example of application in March 2022 as much as 6,301 M<sup>3</sup>

Based on the results of interviews with workers and managers, it is known that workers and management have understood the mechanism of waste management.

**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**

Procedure related to soil fertility is presented in several documents, as follows:

- Procedure No. SOP-EST-002 (Rev. 00) dated 01 June 2007 about planting of legume cover crop (LCC). The procedure mentioned that the LCC is conducted for more N-fixation on the soil.
- Procedure No. SOP-EST-004 (Rev. 01) dated 08 February 2012 about manual manuring. the procedure covers type of fertilizer, time of application, fertilizer placement, fertilizer management, frequency pf application, etc.
- Procedure No. SOP-EST-004A (Rev. 0) dated 24 August 2016 about leaf sampling unit (LSU). The procedure mentioned that LSU shall be conducted annually for annual manuring program calculation reference.
- Procedure No. SOP-EST-004B (Rev. 00) dated 24 August 2016 about soil sampling unit (SSU). The procedure mentioned that SSU shall be conducted every five years. The data also to be used for annual fertilizer calculation program.

The results of field observations found that the application of programs to maintain soil fertility included the application of pruned palm fronds as an alternative nutrient source and fertilization according to recommendations.

**7.4.2**

The company demonstrates procedures related to leaf and soil analysis, including:

- Procedure No. SOP-EST-004A (Rev. 0) dated 24 August 2016 about leaf sampling unit (LSU). The procedure mentioned that LSU shall be conducted annually for annual manuring program calculation reference.
- Procedure No. SOP-EST-004B (Rev. 00) dated 24 August 2016 about soil sampling unit (SSU). The procedure mentioned that SSU shall be conducted every five years. The data also to be used for annual fertilizer calculation program.

The company shows records of Leaf and Soil Analysis, for example as follows:



- (Leaf Analysis) Test Result Report No. 27/BAHAN TANAMAN/IV/2022/MLN dated June 2, 2022 for 79 samples (KCD). The parameters analyzed include: N, P, K, Mg, Ca, B, Cu, Zn, Fe and Mn.
- (Soil Analysis) Test Result Report No. 4/TANAH/II/2020/MLN dated June 2, 2020 for 14 samples (KCD). The parameters analyzed include: pH, C-Organic, N-Total, P-Bray, P-total, Exc-K, Exc-Mg, Exc-Ca, Exc-Na, CEC, BS, K, Mg, Cu, Zn, Mn
- (Leaf Analysis) Test Result Report No. 27/ BAHAN TANAMAN /IV/2022/DLI dated June 2, 2022 for 111 samples (KWS and KSD), the parameters analyzed were: N, P, K, Mg, Ca, B, Cu, Zn, Fe and Mn.
- (Soil Analysis) Test Result Report No. 4/TANAH/II/2020/ DLI on 2 June 2020 for 42 samples. The parameters analyzed were: pH, C-Organic, N, P, K, Mg, Ca, Na, CEC, BS, Mn.

**7.4.3**

Based on the results of field observations, it is known that the company has implemented a nutrient recycling strategy, including through the use of midrib by pruning and the use of bunch ash. The company shows a record of utilization of bunch ash, for example, amounting to 254,424 Kg at KCD in 2022.

**7.4.4**

Based on the study of program documents and the realization of fertilization, it is known that the recommended fertilizers include: Buch Ash, Kaptan, MOP, RP, Urea, CUSO4, ZNSO4, Zinc Copper, and Borate.

Companies can show records of fertilization programs and realization, for example in KSD in 2021 as follows:

Fertilizer Type	Program (Kg)	Realization (Kg)	Achievement
Urea	598,418	598,432	100%
Bunch Ash	1,939,704	1,939,704	100%
MOP	53,536	53,568	100%
SuSO4	1,096	1,100	100%
ZnSO4	14,729	14,750	100%
Zincop	10,366	10,400	100%
RP	37,544	37,543	100%
Borate	42,088	42,100	100%

Based on data above, known that realization of fertilizer is accordance with the recommendation.

**Status: Comply**

**7.5**

**Practices minimise and control erosion and degradation of soils.**

**7.5.1**

Unit of Certification has conducting semi detail soil survey works that conducted by Param Agricultural Soil Survey, Sdn. Bhd. in November 2008. Soil survey for PT DLI and PT Milano, on the area covers about 6,010.00 ha and .670.70 ha, respectively. Soil Map is available in proper scale, i.e. 1:25,000 and 1:50,000. Summary of soil survey results towards soil suitability describes as follows:

**Soil Properties**

- Soils in PT DLI (KWS and KSD) were fully covered by peat soil with several depth, divided into four categories, e.g.: shallow (50-100 m), moderate (100-150 cm), deep (150-300 cm) and very deep (>300 cm). All peat was categorized as marginal with saprist decomposition level. However, there are no sulfidic marine clay deposits. Very deep peat soils which considered as fragile soil has occupy for about 40 % from PT DLI total area, while the rest were considered as marginal. Main limitation for oil palm cultivation on PT DLI were mainly due to very poorly drained property.
- Soils in PT Milano (CDE) were dominated by peat soils for about 80 % with various depth from shallow to deep. The rest were mineral soils over recent riverine alluvium. Even though there is no fragile soil in CDE, however, it has the same main limitation with estates of PT DLI, which is has a very poorly drained soil property.

**Topography**

Based on semi detail soil survey analysis, it was known that slope condition in PT DLI and CDE of PT Milano are dominantly flat to undulating, ranged between 0° to 6°. Thus, there is no soil management limitation due to hilly to steep area. Limitation were mostly due to very poorly drained soil property and prone flooded area. To overcome this matters estate management has conducting field drains system. This situation has observed on the field.

**7.5.2**

Based on the results of interviews with company management and the results of document review, it is known that the company does not have a replanting plan for the next 5 years.

**7.5.3**

Based on the results of interviews with management and the results of the study of area statement documents, it is known that the company did not carry out new plantings.

**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**

Unit of Certification has conducting semi detail soil survey works that conducted by Param Agricultural Soil Survey, Sdn. Bhd. in November 2008. Soil survey for PT DLI and PT Milano, on the area covers about 6,010.00 ha and 670.70 ha, respectively. Soil Map is available in proper scale, i.e. 1:25,000 and 1:50,000. Summary of soil survey results towards soil suitability describes as follows:

- Soils in PT DLI (KWS and KSD) were fully covered by peat soil with several depth, divided into four categories, e.g.: shallow (50-100 m), moderate (100-150 cm), deep (150-300 cm) and very deep (>300 cm). All peat was categorized as marginal with saprist decomposition level. However, there are no sulfidic marine clay deposits. Very deep peat soils which considered as fragile soil has occupy for about 40 % from PT DLI total area, while the rest were considered as marginal. Main limitation for oil palm cultivation on PT DLI were mainly due to very poorly drained property.
- Soils in PT Milano (CDE) were dominated by peat soils for about 80 % with various depth from shallow to deep. The rest were mineral soils over recent riverine alluvium. Even though there is no fragile soil in CDE, however, it has the same main limitation with estates of PT DLI, which is has a very poorly drained soil property.

**7.6.2**

Based on the results of document review and interviews with management, it was found that the company did not develop new plantings.

**7.6.3**

Based on the results of document review and interviews with management, it was found that the company did not develop new plantings.

**Status: Comply**

**7.7**

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

**7.7.1**

Based on the results of interviews and a review of the area statement documents, it was found that the company did not carry out new plantings after November 15, 2018.

**7.7.2**

As of the implementation of the ASA-1.3 activity, there has been no update on the submission of peat area to the RSPO in relation to the peat inventory that has been submitted by the company for the PT DLI and PT Perkebunan Milano areas.

**Peat Area Distribution**

Unit of Certification has conducting semi detail soil survey works that conducted by Param Agricultural Soil Survey, Sdn. Bhd. in November 2008. Soil survey for PT DLI and PT Milano, on the area covers about 6,010.00 ha and 670.70 ha, respectively. Soil Map is available in proper scale, i.e. 1:25,000 and 1:50,000. Summary of soil survey results towards soil peat distribution describes as follows:

- Soils in PT DLI (KWS and KSD) were fully covered by peat soil with several depth, divided into four categories, e.g.: shallow (50-100 m), moderate (100-150 cm), deep (150-300 cm) and very deep (>300 cm). All peat was categorized as marginal with saprist decomposition level.
- Soils in PT Milano (CDE) were dominated by peat soils for about 80 % (or 535.20 ha) with various depth from shallow to deep. The rest were mineral soils over recent riverine alluvium.

**Peat Inventory Report**

Process of peat inventory report of Wilmar Group has started submitted by Certification Lead and Supply Chain manager of Wilmar to GHG Unit of RSPO ([ghg@rspo.org](mailto:ghg@rspo.org)) as RSPO Secretariat representative on 05 November 2019 as verified through email record. Wilmar Group shows second submission to RGPS GHG Unit in 23 April 2020 which mentioned that the submission for Indonesia sites, Wilmar International Ltd. is refers to the Minister of Forestry and Environment Decree No. SK7099/MENLHKPKTL/IPSDH/PLA.1/8/2019 about *Penetapan Peta Indikatif Penghentian Pemberian Izin Baru Hutan Alam Primer dan Lahan Gambut Tahun 2019* (PIPIB) on the defining of peat areas in Indonesia. Latest response from RSPO GHG Unit was delivered on 19 May 2020 which informed that RSPO is acknowledge the receipt of the updated peat inventory and the submission of drainability assessment. RSPO later on will follow up and inform Wilmar Group if any further requirement and clarification is needed.

Based on the results of the review of the peat inventory document that has been sent, it is known that the area of planting on peat in PT DLI and PT Perkebunan Milano is 345.23 Ha.

**7.7.3, 7.7.4**

Procedure of peat monitoring and management is presented in document No. SOP-EST-028 (Rev. 00). The procedure mentioned that peat subsidence monitoring should be conducted every semester. Estate management are able to shows monitoring record of monthly water level and subsidency rate. Installation of subsidence stakes has been carried out since 2010 and Records of monitoring of peat soil subsidence are recorded in Form No. document. FRM-EST-022-032 (Rev. 02).

The company can show documentation of maintenance activities which include repairing damaged peat subsidence posts and cleaning the surrounding area for example:

- Minutes of periodic maintenance of peat subsidence of KSD on 7 April 2022 by the Division 1 Maintenance Team of PT DLI.
- Minutes of maintenance and measurement of weirs Division 2 KSD dated March 15, 2022.
- Weirs' measurement in June 2022 (31 stakes) is between 40 – 60 cm below the peat soil surface.
- The 2022 KWS Subsidence Peg Map contains 8 observation points.
- The Weirs KWS map for 2022 contains 46 permanent weirs, 27-unit Bunds and 2 water gates.
- Weirs' measurement in June 2022 (11 stakes) is between 57 – 77 cm below the peat soil surface.
- Minutes of maintenance of peat subsidence stake on February 9, 2022 at Cabang Dua Estate.
- Minutes of maintenance of the Bund Off/ Weirs Cabang Dua Estate dated April 16, 2022.
- The results of the weirs measurements in June 2022 revealed that the water level was between 40-55 cm.

The company shows the monitoring records of peat subsidence, for example during 2022 for the following locations:

Unit	Block	Subsidence (cm)
Sei Deras	072	4
	067	1
	086	0
	103	1

	110	2
	120	4
	094	0
	097	0
	136	0,2
Wonosari	144	0,1
	152	0,3
	154	2,3
	051	0
Cabang Dua	053	1
	059	0

The results of field observations for example the subsidence stake area No. 1 Block 51, piezometer No. 1 Block 47 is known that the condition of the stake is in a well-maintained condition. In addition, the results of field observations of Water Level Block 52 are known to be between 40-45 cm high.

Monitoring Well Measurement Data for PT Perkebunan Milano Cabang Dua Estate in June 2022 for example on 20 June 2022 with a height between 49 – 85 cm below the peat soil surface.

The results of interviews with management revealed that peatland management includes monitoring of subsidence, water management with stop bunds and watergates, monitoring of water level (weirs) and ground water level. However, KWS and KSD have not monitored the groundwater level because there is no decree on the determination of groundwater level monitoring points from the relevant agencies so that peatland management is carried out including monitoring peat subsidence and water management with stop bunds and watergates as well as measuring water level (weirs).

Letter No. 476/1473/Dis.LH-SU/VI/2022 dated 6 June 2022 regarding Monitoring and Evaluation of Water Management for Business Actors and/or Activities on Peatland which contains a plan for a field visit from the Environment Agency of North Sumatra Province on 7 – 11 June 2022. Minutes of field visits are already in the Plantation Agency of Labuhanbatu Regency but have not been taken by the company.

Based on the explanation above, the company has an opportunity for improvement by coordinating with relevant agencies in determining the monitoring point for groundwater level on peatlands, especially in KSD and KWS. **(OFI)**

#### 7.7.5

The company does not have a replanting plan for the next 5 years and there is no planting year more than 15 years. So a drainability assessment has not been carried out.

#### 7.7.6

As informed on semi detail soil survey report that conducted by Param Agricultural Soil Survey, Sdn. Bhd. in November 2008, it was known that main soil limitation in PT DLI and CDE-PT Perkebunan Milano were due to presence of peat soils which has a very poorly drained soil property. Agronomy strategy to overcome this situation was refers to procedure No. SOP-EST-022 and document No. SOP-EST-028 (Rev. 00) dated 01 February 2015. Based on field observation and document review, several strategies which already implemented by estate management was adoption a proper peat management as follows:

- Water managemet through maintaining water level at 60-80 cm and monitoring of peat subsidency rate as indicator of water management quality.
- Installing field drain with pattern 1:4 and flap gate.
- Canal desilting for water discharge.and application of kaptan (CaCO<sub>3</sub>) which aims to increase soil pH.
- Peat compaction with “hole in hole” planting method, which starts implemented on palms planted in 2014 forward.

- Maintaining land cover crop which aims to retain soil moisture on the field.
- Fertilizer application as in accordance with Agronomist recommendation, especially additional micronutrient on B, Cu and Zn.
- Carry out mounding palm activities to fixing sloping palm trees.

**7.7.7**

Based on hectare statement review, it was known that there is no presence of peatland conservation areas. All areas were used for oil palm plantation activities. Furthermore, there is no land clearance for non-corporate purposes areas in PT DLI and KCD of PT Perkebunan Milano.

**Status: Comply**

**7.8**

**Practices maintain the quality and availability of surface and ground water**

**7.8.1.**

The unit of certification shown the practices to maintain the quality and availability of surface and ground water. Water management plan for POM and estate are listed on 2021/2022 water management plan document. These document describe the water source identification, POM water usage efficiency, peat soil management, and conservation/catchment area protections.

Water sources management and maintenance efforts include:

- The results of interviews with spray operators show that the operators understand how to work properly and safely as well as areas that should not be applied, such as the 3 meter left and right trench borders in order to preserve water flow
- The company conducts testing of the Barumun River water and the employee housing office well water every 6 months
- Vetiver grass planting along the canals to prevent landslides and erosion
- Maintenance of canals with a wash / dredge program to protect them from superficiality

Based on field observation and interview with several workers at the housing complex on KCD, KSD and KWS it was known that the clean water for bath and wash are from well then, the water was channeled to the profil tank and each worker housing. While the water consumption for workers are from water depot, the management were explained that source water from Barumun River (outside of unit certification) distribute by water tank truck. Therefore, based on interview with Head of Village from Sei Nahodaris Village, Sei Tampang Village and Kampung Bilah Village sighted that there are no water pollution issues during last year. The auditor team also visit to the firebreak canal (HCV4.3) Block 58, Division I, KCD it was sighted there are signboard of no spraying activities on the riparian.

The unit of certification also conducted water quality testing every semester by accredited laboratory. For example:

- Upstream of Barumun River: BOD 2.46 mg/l; COD: 23.8 mg/l and pH: 6.55 mg/l
- Downstream of Barumun River: BOD: 2.89 mg/l; COD: 24.6 mg/l and pH: 6.9 mg/l

Based on document verification sighted that All parameters tested do not exceed the quality standards required in the applicable regulations.

**7.8.2.**

The unit of certification has procedure of Conservation area identification and management with number SOP-GEN-010, Rev-01 dated 01 May 2015. This procedure were explained about:

- Conservation area identification
- Feasibility assessment of conservation area management
- Prohibition of spraying and fertilizing activities on riparian zone (3-5 meters from the river).

Based on interview with spraying workers in KCD and KSD sighted that they has known about this procedure, therefore in accordance to field observation result to the Block 58, Division I, KCD sighted that there is no fertilizing and spraying activities.



**7.8.3.**

The unit of certification already has a permit document for disposal of effluent to the water bodies in accordance to the Decree of the Head of “*Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu*”, Labuhanbatu District with number: 503.660.31 / 266 / DPMPTSP-BP2MNP / 2018 dated 4 May 2018 concerning the extension of the validity period of the permit for disposal of waste water to water or to water sources at the palm oil mill (POM) of PT. Daya Labuhan Indah - Wonosari in Sei Tampang Village, Bilah Hilir District, District Office Labuhanbatu which is valid until April 25, 2023.

The effluent quality test on effluent pond number nine were conducted by accredited laboratory every month, for example: BOD: 89.64 mg/l; 89.69 mg/l; 86.92 mg/l period of January to March 2022 respectively. All of parameters are comply with the Environment Minister Regulation number 5 year of 2014. Based on interview with Environment Board of Labuhanbatu District and Head of Village Sei Tampang it was known that there no complained about water pollution during last year.

**7.8.4**

The company has a water usage budget of 1.77 m3/Ton FFB, based on the results of recording water consumption, for example for the period January – December 2021, it is known that the highest water use for processing is in October 2021 where usage reaches 1.25 m3/Ton FFB. The total average water use during 2021 is 1.22 m3/Ton FFB.

**Status: Comply**

**7.9**

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

**7.9.1**

The unit of certification has implemented fiber and shell usage for fossil fuel substitution. Realization of renewable energy have been monitored on monthly report for fiber and shell usage. During Jan-December 2021, they has optimally fiber and shell usage as renewable energy (100% fiber is used as boiler fuel, while shells are only a small part sold). Based on above data sighted that during period of January to December 2021, shell and fiber usage can produce the energy 3,351,960 kWh, or equivalent to 22.35 kwh/ton FFB.

**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 minimise GHG emissions.**

**7.10.1, 7.10.2**

PT DLI and PT Milano have not carried out new developments since January 2015. So the company's current net GHG emissions are as described in indicator 7.10.1. All waste including emissions and pollutions sources from Mill and estate are identified and recorded on waste and pollution identification for period of 2021. Potential GHG emission from estate and mill activities that has been identified including for examples transportation activities, manuring activities, peatland emission, and boiler emission.

The unit of certification have implemented the use of fiber and shell for fossil fuels substitution. Realization of renewable energy have been monitored on monthly report for fiber and shell usage. Waste water has been monitored every months and monitoring period Jan-Mar 2021 shown that all of waste water testing parameters is compliant to the standards quality. Meanwhile company also conduct regular emission testing for semester basis, 2nd semester 2021 testing results indicates boiler emission has been met with standard quality.

Daya Labuhan Indah II POM and supply bases has calculated GHG emissions for period 2021 using RSPO Palm GHG calculator version 4.0, the results of this calculation are presented as following details:

Summary Emission

<b>Product</b>	<b>tCO<sub>2</sub>e/t Product</b>
CPO	1.59
PK	1.59
PKO	0



PKE	0				
<b>Description</b>	<b>Unit</b>	<b>Value</b>			
Oil palm planted on mineral soil	Ha	6171.71			
Oil palm planted area on peat	Ha	337.28			
Total oil palm planted area	Ha	6508.99			
Conservation area (Forested)	Ha	0.00			
Conservation area (Non-Forested)	Ha	29.85			
FFB production per hectare	t/ha	23.62			
OER	%	20.62			
KER	%	3.41			
<b>Mill Emission and credits</b>					
Remarks	tCO <sub>2</sub> e	tCO <sub>2</sub> e/t FFB			
<b>Emissions sources</b>					
POME	29395.62	0.20			
Fuel consumption	270.51	0			
Grid electricity	0.00	0			
<b>Credits</b>					
Export of grid electricity	0.00	0			
Sales of PKS	0.00	0			
Sales of EFB	0.00	0			
Total	29666.13	0.50			
<b>Estate/Plantation of field emission and Sinks</b>					
<b>Description</b>	<b>Own crop</b>		<b>Group</b>	<b>Total</b>	
<b>Emission Sources</b>	<b>tCO<sub>2</sub>e</b>	<b>tCO<sub>2</sub>e/ ha</b>	<b>tCO<sub>2</sub>e</b>	<b>tCO<sub>2</sub>e/ ha</b>	
Land conversion	50003.10	9.87	8008.62	5.55	58011.72
CO <sub>2</sub> emissions from fertilizer	2361.41	0.47	687.28	0.48	3048.69
NO <sub>2</sub> emissions from Peat	2523.87	0.50	0.00	0.00	2523.87
N <sub>2</sub> O emissions from fertilizer	2296.52	0.45	461.34	0.32	2757.86
Fuel consumption	1227.38	0.24	447.83	0.31	1657.22
Peat oxidation	1840.67	3.63	0.00	0.00	18408.67
<b>Sinks</b>					
Crop sequestration	-47396.30	-9.36	-11453.00	-7.93	-58849.30
Sequestration in Conservation area	0.00	0.00	0.00	0.00	0.00
Total	29424.66	5.81	-14847.93	-1.28	27576.73
Based on document review, net GHG emission for year 2021 were decreased compared to las year net GHG emission (1.73 to 1.59) t CO <sub>2</sub> /t product. *During the ASA-1.3 audit, the RSPO GHG was disrupted and could not be verified online.					
<b>7.10.3.</b>					
All waste including emissions and pollutions sources from Mill and estate are identified and recorded on waste and pollution identification 2021/2022. Potential GHG emission from estate and mill activities that has been identified including for examples transportation activities, manuring activities, peatland emission, and boiler emission. The unit of certification have implemented the use of fiber and shell for fossil fuels substitution. Realization of renewable energy have been monitored on monthly report for fiber and shell usage. Wastewater has been monitored every months and monitoring period Jan-Mar 2022 shown that all of waste water testing parameters is compliant to the standards quality (see indicator 7.8.3). meanwhile company also conduct regular emission testing for semester basis, 2nd semester 2021 testing results indicates boiler emission has been met with standard quality.					
<b>Status: Comply</b>					

**7.11**

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

**7.11.1**

The company already has a Zero Deforestation, Zero Peat and Zero Exploitation policy which was stipulated on December 5, 2013 explaining among other things that the company does not burn for land clearing and preparation for new plantings, replanting or other development in accordance with the full scope of the policy.

Based on this policy, it can be concluded that the company does not clear land by burning it.

**7.11.2**

The company already has fire control facilities and infrastructure and has carried out periodic inspections, for example for the period of May 2022, as outlined in the following table:

No.	Equipment	Quantity	Condition
1	Operational vehicle	2 unit	Good
2	Water pump	2 unit	Good
3	Hose	2 pcs	Good
4	Shovel	1 pcs	Good
5	fire extinguisher	43 pcs	Good
6	Ambulance	1 unit	Good
7	Evacuation Stretcher	1 unit	Good
8	Fire Control Tower	1 unit	Good
9	Bells/ Siren	4 pcs	Good
10	Firefighter Clothes	2 pairs	Good
11	Fire Shoes	2 pairs	Good
12	Fire Gloves	2 pairs	Good
13	Fire Helmet	2 pcs	Good
14	First Aid Box	2 box	Good

From the table, the company already has facilities and infrastructure for fire control and is in good condition, in addition, based on the results of interviews with the company that the company has plans to add facilities and infrastructure for fire control in 2022-2025

In addition, the company shows an example of the identification document for the need for emergency response equipment for fires at Sei Deras for the period 2022, 2023, 2024, and 2025. Ministry of Agriculture 5 of 2018, for example, currently lacks high-pressure pumps (min.25 HP), the company plans to fulfill these fire extinguishers in 2022.

**7.11.3**

Based on the results of interviews with village community representatives, the company has carried out socialization for fire prevention measures such as prohibiting land clearing by burning or based on a signboard prohibiting fire prevention.

**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 information on plantation management and a review of the hectare statement from the previous audit, it is known that there was no additional planting or expansion of the plantation operational area after November 15, 2018. Certification unit do not conduct any new development since November 2005. PT Daya Labuhan Indah and PT Perkebunan Milano has conduct disclosure to RSPO on July 2014, and as a result RSPO has confirmed PT Daya Labuhan Indah and PT Perkebunan Milano as zero liability on 2017.

**7.12.2**

There is no additional planting or expansion of the plantation operational area after November 15, 2018. The certification unit has identified HCVs by RSPO Appraisers who have been approved in 2013 for PT Daya Labuhan Indah and in 2009 for PT Perkebunan Milano (Cabang Dua Estate). The following is a further explanation:

- The unit of certification has identified protected, rare, rare, or endangered species, and habitats with high conservation value in 2013 at PT Daya Labuhan Indah. The HCV identification activity was carried out using the HCV toolkit and involved stakeholder participation through a public consultation conducted on 6 May 2013. The identification was carried out in collaboration with a third party, namely Remark Asia. The identification team consists of 8 people of which 3 have been RSPO Approved. From the identification results, it was found that there were HCV 1.1, HCV 1.3, HCV 1.4, HCV 2.3 and HCV 3 covering an area of 3.42 Ha. In addition, there is also an HCV 4.3 covering an area of 5.7 Ha which functions as a natural barrier to prevent the spread of fires (firebreaks).
- The unit of certification has identified protected, rare, rare, or endangered species, and high conservation value habitats at PT Perkebunan Milano (Cabang Dua Estate). Identification was carried out in collaboration with a third party, namely Aksenta, in July 2009. The identification team consisted of 3 people, 3 of whom were RSPO approved. From the identification results, it was found that there is HCV 4.3 covering an area of 2.36 Ha which functions as a natural barrier to prevent the spread of fires (firebreaks) and HCV 6 covering an area of 0.25 Ha is an area that has an important function for the Cultural identity of the Local Community.

HCS does not apply to the unit of certification this time, because the unit of certification was already certified before the issuance of regulations regarding HCS. The total area of HCV in the unit of certification is 11.73 Ha

### 7.12.3

This indicator is not relevant to Indonesia, until further decisions by RSPO.

### 7.12.4

There is no additional planting or expansion of the plantation operational area after November 15, 2018. The certification unit has an HCV Management Plan of PT Daya Labuhan Indah and PT Perkebunan Milano (Kebun Cabang Dua) annually from 2021 to 2023. In the HCV Management Plan, the certification unit has several activities including:

- Maintain the existence of flora and fauna in the Danau Biru
- Keeping HCV areas from burning
- To prevent hunting in the company's HCV areas
- Maintain and increase the quality of peat areas with a depth of more than 3 meters in the Danau Biru area
- Maintain and improve the quality of the Danau Biru area as a water provider and flood control.

Following up OFI in the previous year related to community involvement in setting management plans and monitoring HCVs. the review of the HCV management and monitoring plan was carried out in conjunction with the SIA Review in early 2022, from the results of the review conducted, the company did not receive special feedback from the community for the management and monitoring of HCV in PT DLI, so that the HCV management and monitoring plan carried out still refers to the plan 2021 HCV management and monitoring.

Implementation of HCV management and monitoring for 2021/2022 is carried out in accordance with the HCV management plan, for example:

- Socialization related to the HCV area to the surrounding community on 10 Juni 2021 (available minutes, attendance list and photos of activities).
- Flora and fauna monitoring activities are carried out every month from July to December 2021 and Januari to march 2022.
- Inspections to ensure safety and implementation of HCV management mitigation are carried out weekly by the HCV officers of each estate and are included in the HCV patrol reports.

The certification unit has evaluated the HCV Management Plan of PT Daya Labuhan Indah and PT Perkebunan Milano (Cabang Dua Estate) annually from 2018 to 2020. The last evaluation was carried out on February 4, 2021, and was carried out by the certification unit. The evaluation explained that the implementation of monitoring and management of the HCV area including the existing flora and fauna has been carried out effectively (achievement of 100%). Since 2020 until now there has never been any destruction or occupation in the HCV area.

**7.12.5**

Based on plantation management information and a review of the hectare statement from the previous audit, it is known that there will be no additional planting or expansion of the plantation operational area after November 15, 2018. All HCV areas are old HCV areas which do not overlap with community interests. The entire HCV area is within the company's HGU.

**7.12.6**

The company has developed an HCV management plan and is implementing it accordingly. Regular patrol records show that the company has been monitored for illegal hunting, and other illegal activity. All records for daily patrols at each plantation are available and reports by auditors. The socialization that has been carried out to the community regarding the existence of endangered plants and animals is carried out simultaneously with the socialization of protected areas, for example the socialization of the existence of protected animals and plants to the Sei Nahodaris Village community on 10 June 2021 and for Sei Tampang & Kampung Bilah Village on 03-04 February 2021. This can be proven by an official report in which there is documentation and a list of attendees.

Based on interviews with employees and public consultations with the surrounding community by telephone, it was found that the company had understood the existence of rare flora and fauna, both employees and the community could mention the types of protected species. is in the plantation area of certification unit. The company has conducted outreach to employees and the public regarding the steps that must be taken if there is a meeting with wild / rare animals. The results of the interviews and the RKL-RPL documents have also never been hunting in the company area.

**7.12.7**

Based on the monitoring result of HCV in previous surveillance until this current audit process, there has been no indication of poaching of protected animals because they are rarely found around HCV areas bordering rivers. The unavailability of animal corridors between designated HCV areas and production forests and / or other protected forests is one of the reasons why wildlife species are rarely seen in HCV areas.

Avoid and prevent illegal hunting and / or encroachment of HCV areas that have been determined by certification unit, several warning boards have been installed regarding the prohibition of poaching and encroachment. Routine monitoring of HCV areas is carried out by several personnel appointed by the company. The results of field observations also indicate that there are signs that prohibit hunting of protected animals, burning, and marking the boundaries of conservation areas.

Monitoring of protected areas is carried out periodically every month to ensure the safety of the area. Examples of monitoring at Sei Deras Estate on 10 Januari 2022 for monitoring of warning boards, monitoring of stake boundary of HCV areas, and flora fauna monitoring. The results of field visits to several conservation areas show that the certification area has carried out protected area management in the form of not logging and replanting, not using chemicals, and installing Protected Area signage and prohibiting hunting.

The management plan is implemented effectively based on the results of monitoring which is carried out regularly every year, and the management plan is updated every year if needed. updates are determined based on the results of evaluated HCV monitoring. The results of the evaluation and updating of the HCV management plan will then be disseminated to all stakeholders within the scope of certification and will be applied in the next period.

**7.12.8**

As explained in indicator 7.12.1, the company has no obligation to implement RaCP. In addition, up to an assessment of 1.3, it is known that there was no additional planting or expansion of the plantation operational area after November 15, 2018. Therefore, this indicator is not applicable.

**Status: Comply**

**3.2 Conformity Checklist of Certificate and Logo Use**

<b>1.</b>	<b>Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client</b>	<b>X or √</b>
<b>ASA – 1.3</b>	DLI-2 POM and its supply bases did not use trademark in the product or any of its activity	✓
	<b>Status: Comply</b>	
<b>2.</b>	<b>Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use</b>	<b>X or √</b>
<b>ASA – 1.3</b>	DLI-2 POM and its supply bases did not use trademark in the product or any of its activity	✓
	<b>Status: Comply</b>	
<b>3.</b>	<b>Implementation of Certificate and Trademark is not used on product</b>	<b>X or √</b>
<b>ASA – 1.3</b>	DLI-2 POM and its supply bases did not use trademark in the product or any of its activity	✓
	<b>Status: Comply</b>	
<b>4.</b>	<b>Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.</b>	<b>X or √</b>
<b>ASA – 1.3</b>	DLI-2 POM and its supply bases did not use trademark in the product or any of its activity	✓
	<b>Status: Comply</b>	

**3.3 Summary of RSPO Partial Certification.**

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

Wilmar International Ltd Time Bound Plan (TBP) is explained in point 1.10. Wilmar International Ltd has informed the TBP progress, MUTU has considered that Wilmar International Ltd is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Wilmar International Ltd for Indonesia update Januari 2021, Malaysia update June 2021, Africa update May 2021

MUTU has verified partial certification for un-certified unit's subsidiary of Wilmar International Ltd based on their Time Bound Plan. There are seven (7) uncertified mills and twenty (20) uncertified estates and fourteen (14) uncertified smallholders of Wilmar International Ltd. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from other sources.

MUTU Auditor has verified company partial certification and concludes that:

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

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Wilmar Engaged Control Union to conducted assessment of compliance on the minimum requirements for multiple management units as detailed in section 5.5 of the RSPO Certification System for Principles & Criteria June 2020 for Wilmar International Limited and its subsidiaries as listed in this report below
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)	<p>There is no replacement of primary forest since November 2005. HCV assessments are conducted prior to new planting and all new plantings are in accordance with RSPO New Planting Procedures. Below is the summary of proposed new oil planting for the group:</p> <p>Wilmar International - Benso Oil Palm Plantation (BOPP) has proposed a new planting smallholder oil palm project on a 1,477ha communal farmland located in Trebuom in the Mphor District of the Western Region of Ghana. The RSPO NPP summary management plan and NPP notification available in RSPO.</p> <p><a href="https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-benso-oil-palm-plantation-bopp">https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-benso-oil-palm-plantation-bopp</a></p>



2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Biase Plantation Limited (Calaro extension) has proposed new planting area located in Atan Odot village and Uwet village, Odukpani and Akamkpa Local Government Area, Cross River State, Nigeria. The summary report of Wilmar International Limited - Biase Plantation Limited (Calaro extension) completed in 2016.  <a href="https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-limited-biase-plantation-limited-calaro-extension">https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-limited-biase-plantation-limited-calaro-extension</a></p> <p>Eyop Industries (Oban Estate) pending clarification and clearance from government for NPP assessment.</p> <p>The internal audit documentation for uncertified areas were observed and it is confirmed that there was no replacement of primary forest.</p> <p>The group has Grievance Procedure for the implementation of Wilmar's NO Deforestation, No Peat, No Exploitation (NDPE) Policy updated version 2.0 November 2019 as link  <a href="https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/grievance/grievance-sop/grievance-procedure_final.pdf?sfvrsn=7670cea2_2">https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/grievance/grievance-sop/grievance-procedure_final.pdf?sfvrsn=7670cea2_2</a></p>
2.1.3	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<p>Wilmar International - Benso Oil Palm Plantation (BOPP) has proposed a new planting smallholder oil palm project on a 1,477ha communal farmland located in Trebuom in the Mpohor District of the Western Region of Ghana. The RSPO NPP summary management plan and NPP notification available in RSPO.  <a href="https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-benso-oil-palm-plantation-bopp">https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-benso-oil-palm-plantation-bopp</a></p> <p>Biase Plantation Limited (Calaro extension) has proposed new planting area located in Atan Odot village and Uwet village, Odukpani and Akamkpa Local Government Area, Cross River State, Nigeria. The summary report of Wilmar International Limited - Biase Plantation Limited (Calaro extension) completed in 2016.  <a href="https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-limited-biase-plantation-limited-calaro-extension">https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-limited-biase-plantation-limited-calaro-extension</a></p> <p>Eyop Industries (Oban Estate) pending clarification and clearance from government for NPP assessment.</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p>There is no land conflict in uncertified area also no complain or conflict observed in the RSPO Complains System.</p> <p>The group has policy for any complaint. Where employees of the Wilmar Group in confidence, raise concerns about possible corporate improprieties. This Policy ensures that arrangements are in place for independent investigations of alleged improprieties and for appropriate follow-up actions as link below; <a href="https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/wilmar-whistleblowing-policy.pdf">https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/wilmar-whistleblowing-policy.pdf</a></p> <p>This grievance procedure is open to all stakeholders, though is primarily focused on receiving grievances from external sources. For workers and local communities with specific local level grievances, each of our plantation and mill operational units have site specific complaints and grievances procedures, which have been a requirement of the RSPO Principles and Criteria since 2005. These site-specific procedures are accessible by workers and to any other stakeholder. Grievances raised through the site-specific procedures have a separate resolution process - Consultation and Communication Procedure. The SOP also available in website link as below; <a href="https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/grievance/grievance-sop/grievance-procedure_final.pdf?sfvrsn=7670cea2_2">https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/grievance/grievance-sop/grievance-procedure_final.pdf?sfvrsn=7670cea2_2</a></p> <p>The internal audit documentation for uncertified areas were observed and it is confirmed that there were no land conflicts.</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p>The group has Dispute &amp; Resolution Procedure Doc No PPB/RSPO 6.3 (2.2)/(1) revision date 25 Oct 2018 purpose to facilitate a dispute and grievances resolution process between the management, growers and miller and employees, local communities and other affected external parties.</p> <p>The internal audit documentation for uncertified areas were observed and it is confirmed that there were no land conflicts.</p> <p>There are no reports of legal disputes at the time of reporting.</p> <p>The internal audit documentation for uncertified areas were observed and it is confirmed that there were no labour disputes.</p>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
2.1.6	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1 (it has changed be Criterion 4.2 in P&C 2018).	<p>The internal audit procedure doc no PBB/PRO 12/(03)/0212 revision 23 March 2020 (Rev 4) conducted periodically for uncertified and certified area and result of internal audit for uncertified areas were observed and it is confirmed that all laws are in compliance.</p> <p>Sample internal audit has been review for: Laba Utama Estate. Assessment has been conducted on April 2021. Noted that there is no non-compliance during the assessment as required by uncertified management unit.</p> <p>PT Sarana Titian Permata. The assessment conducted on Jan 2021. Noted that pending on HGU process. Target completion by 2023.</p> <p>PT Agronusa Investama Assessment conducted in February 2021. Pending on the HGU process and target completion by 2022.</p> <p>Trebuom Adum Smallholder Oil Palm Project Assessment conducted in July 2021 with no non-compliance as per uncertified management unit requirements.</p> <p>Calaro Estate. Noted that the assessment has been conducted in May 2021. Noted that there are no identified of noncompliance in the management unit assessed.</p> <p>Sampled internal audit for Suburmas Plantation Sdn Bhd, Jebawang Sdn Bhd, Eyop Industries Limited (EIL) and Biase Plantation Limited (BPL). There has no public comment in website RSPO regarding uncertified area.</p>

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

**3.4.1. Identification of Findings, Corrective Actions and Observations at ASA 1.2**

<b>NCR No.</b>	:		<b>Issued by</b>	:	
<b>Date Issued</b>	:		<b>Time Limit</b>	:	
<b>NC Grade</b>	:		<b>Date of Closing</b>	:	
<b>Standard Ref. &amp; Requirement</b>	:				
<b>Evidence observed</b> (filled by auditor):					
<b>Non-Conformance Description</b> (filled by auditor):					
No NC during surveillance 1.2 audit					
<b>Root Cause Analysis</b> (filled by organization audited):					
<b>Correction</b> (filled by organization audited):					
<b>Corrective Action</b> (filled by organization audited):					
<b>Assessor Evaluation and Conclusion</b> (filled by auditor):					
<b>Verified by</b>	:				

**3.4.2. Identification of Findings, Corrective Actions and Observations at ASA 1.3**

<b>NCR No.</b>	:		<b>Issued by</b>	:	
<b>Date Issued</b>	:		<b>Time Limit</b>	:	
<b>NC Grade</b>	:		<b>Date of Closing</b>	:	
<b>Standard Ref. &amp; Requirement</b>	:				
<b>Evidence observed</b> (filled by auditor):					
<b>Non-Conformance Description</b> (filled by auditor):					
No NC during surveillance 1.3 audit					
<b>Root Cause Analysis</b> (filled by organization audited):					
<b>Correction</b> (filled by organization audited):					
<b>Corrective Action</b> (filled by organization audited):					
<b>Assessor Evaluation and Conclusion</b> (filled by auditor):					
<b>Verified by</b>	:				

**3.4.3. Opportunity for Improvement**

No	Ref. Std.	Description
1	3.6.2	<p><b>The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored</b></p> <p>The company has the opportunity to improve by realizing periodic health checks for all workers and special examinations (spirometry) for workers with certain risks and carrying out follow-up if workers are found to have health problems while still paying attention to health protocols to prevent the transmission of covid-19.</p>
2	7.3.1	<p><b>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</b></p> <p>The Certification Unit has a solid waste management SOP, with the number SOP-MIL-030 2nd revision valid since January 1, 2020, in the SOP it is explained that the management of empty bunches is carried out by burning in stove and a small part is applied to the estate, boiler ash management is used for road hoarding and given to people who ask for it, or sell it.</p> <p>Based on the results of the field visit to the Empty Bunch Area, it was found that the condition of empty bunches was piling up, this was due to the inoperability of the furnace in the POM. The management unit shows Budget / Capex 2022 where one of the plans in it is to build an Incinerator with a capacity of 30 tons.</p> <p>The Certification Unit has the opportunity to ensure that the process of procurement/construction of new incinerators for the management of empty bunches can be carried out so that waste management of empty bunches can be carried out according to the procedures and waste management plans that they have.</p>
3	7.7.4	<p><b>Availability of implementation evidence of the water and land cover management program.</b></p> <p>The results of interviews with management revealed that peatland management includes monitoring peat subsidence, water management with stop bunds and Watergates, monitoring water level (weirs) and ground water level. However, KWS and KSD have not carried out monitoring of groundwater levels because there is no decree on the determination of groundwater level monitoring points from the relevant agencies so that peatland management is carried out including monitoring peat subsidence and water management with stop bunds and Watergates as well as measuring water level (weirs).</p> <p>Based on the explanation above, the company has an opportunity for improvement by coordinating with relevant agencies in determining the monitoring point for groundwater level on peatlands, especially in KSD and KWS.</p>

**3.4.4. Noteworthy Positive Components**

No	Description
1	Management commitment to apply the principles of sustainable palm oil management.
2	The company has personal competence related to the fulfillment of sustainable palm oil certification standards.
3	Has received ISPO certificate valid until August 3, 2022





**3.5 Summary of Arising Issues from Public and Auditor Verification**

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>Employment Agency</b>  <b>Labuhanbatu Regency</b>  <b>Date: 21 June 2022</b></p> <ul style="list-style-type: none"> <li>• The company has implemented mandatory reporting such as WLTk reports and quarterly P2K3 reports.</li> <li>• The company reported that it did not violate the provisions in employment, such as regulations related to the district minimum wage, PKWT, employee considerations, BPJS <i>Ketenagakerjaan</i> and BPJS <i>Kesehatan</i>.</li> <li>• There are no issues of foreign workers, migrant workers, underage workers, worker discrimination, gender issues, forced labor, and other labor issues.</li> <li>• The company has complied with personal protective equipment for workers.</li> </ul>	<p>There are no negative issues that need further verification.</p>
<p><b>Head of Environmental Agency</b>  <b>Labuhanbatu Regency</b>  <b>Date: 21 June 2022</b></p> <p>Based on the results of the interview, information was obtained that the company had complied with all applicable relevant permits, and routinely reported its obligations.</p> <p>Regarding environmental issues, information was obtained that there have never been any complaints or complaints from the public or NGOs regarding environmental pollution caused by the company. Information about land fires and conflicts with animals also never occurred in the company's area.</p>	<p>There are no negative issues that need further verification.</p>
<p><b>Head of Plantation and Livestock Agency</b>  <b>Labuhanbatu Regency</b>  <b>Date: 21 June 2022</b></p> <ul style="list-style-type: none"> <li>• Reports must be submitted regularly and on time</li> <li>• Plantation class assessment is class II</li> <li>• The company has fulfilled its plasma development obligations</li> <li>• Facilities and infrastructure for forest and land fire prevention are in accordance with applicable regulations</li> <li>• There are no land fire issues</li> </ul>	<p>There are no negative issues that need further verification.</p>
<p><b>Head of Land Agency</b>  <b>Labuhanbatu Regency</b>  <b>Date: 21 June 2022</b></p> <ul style="list-style-type: none"> <li>• There are no new location permits within the company</li> <li>• There is no additional HGU in the company</li> <li>• There are no reports regarding the issue of land disputes</li> </ul>	<p>There are no negative issues that need further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>PUK.SP. PP-SPSI, Federation of Indonesian Metal Workers Union (PUK-FSPMI) dan PB-Serbundo</b> Date: 21 June 2022</p> <ul style="list-style-type: none"> <li>• Loose citations are not fully paid</li> <li>• Loose harvest is estimated per sack of fertilizer.</li> <li>• For example: For 50 kg fertilizer capacity, loose fruit is calculated as 40 kg</li> <li>• Harvesting of FFB consists of 2 types, namely ripe and abnormal, but regarding the harvesting of FFB, it is not specified in the employee's salary slip.</li> <li>• The company cuts scholarships to workers' children if they get an SP from the company</li> <li>• Housing in Division II is damaged, there is no repair from the company</li> <li>• The company provides SP to employees without any prior guidance</li> <li>• Determination of fines is not socialized to employees</li> </ul>	<ul style="list-style-type: none"> <li>• Regarding the lack of payment for loose quotations, the company has shown payment data that the shortage will be paid in the payroll period for the June 2022 period to 22 employees who have been approved by the management of PT DLI</li> <li>• Regarding the estimation of loose bulk calculation per sack of fertilizer, the company has shown an official report on the calibration of loose weights according to the capacity of the sack of fertilizer used together with employees which was made on December 27, 2021</li> <li>• Regarding FFB harvesters, the fruit category was not specified on the salary slip, the company explained that if an employee wanted to know the details of the salary slip, the employee was allowed to come to the estate office and the company could fulfill the employee's request.</li> <li>• Regarding scholarship cuts, the company has regulated in the Basic, Middle and Upper Education Scholarship Assistance Procedure for Employees' Children which was approved by management on April 1, 2015, the company also added that the purpose of cutting scholarships from parents who received the SP is to workers who as parents of the child are a good example for their children by being disciplined in working in the company</li> <li>• Regarding the damaged housing in Division II, the company has made repairs in accordance with the complaint logbook data shown by the company, the company also added that the employee housing facilities will be under construction in stages as evidenced by the minutes on November 30, 2021 regarding the progress of construction work 2 employee housing unit type G.10 in collaboration with contractor CV. Parlan Jaya</li> <li>• Regarding the SP, it has been regulated in the PKB and the company has socialized the PKB on 27 May 2022 which was attended by 18 people</li> <li>• Regarding the determination of fines, it has been regulated in the PKB and the company has socialized the PKB on 27 May 2022 which was attended by 18 people</li> </ul>
<p><b>Gender Committee</b></p> <p>Based on interviews, information was obtained that there were no issues regarding employment related to gender committees</p>	<p>There are no issues that need to be verified further, all information obtained from the results of the interviews</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>during the past year such as sexual harassment, violence, and discrimination.</p> <p>The gender committee also conveyed information related to work programs that will be implemented in 2022 such as socialization regarding sexual harassment, the mechanism of complaints or complaints etc. In addition, female workers are also entitled to menstrual leave (H1) and maternity leave (H2).</p>	<p>has been submitted to the relevant indicators.</p>
<p><b>Issues from Media</b></p> <p><b>Link:</b>  <a href="https://ligo.id/langgar-percepatan-kerja-bersama-federasi-serbundo-juang-pt-daya-labuhan-indah/">https://ligo.id/langgar-percepatan-kerja-bersama-federasi-serbundo-juang-pt-daya-labuhan-indah/</a></p> <p><b>Related:</b>            PT DLI violated the collective labor agreement (PKB). The violation committed was not including in-kind allowances in the calculation of religious holiday allowances (THR) since 2020.</p>	<p>The company and the Labor Union have settled this case at the Medan District Court Class I-A Special on April 25, 2022. Where the claim from the Petitioner is rejected.</p> <p>The Plaintiff then filed an appeal to the Supreme Court on 21 July 2022 with No. W2.U1/12699/HK.02.Sus-PHI/VII/2022 until now there has been no decision.</p>
<p><b>Issues from Media</b></p> <p><b>Link:</b>  <a href="https://fpbiindonesia.wordpress.com/2022/04/21/fpbi-dampingi-korban-phk-seperti-pks-daya-labuhan-indah-2/">https://fpbiindonesia.wordpress.com/2022/04/21/fpbi-dampingi-korban-phk-seperti-pks-daya-labuhan-indah-2/</a></p> <p><b>Related:</b>            Unilateral termination of employment and not in accordance with company procedures.</p>	<ul style="list-style-type: none"> <li>• The company has held a meeting with the Labor Union because the employee with the initials HS who was the victim of the layoff has been absent for 5 consecutive days</li> <li>• The company has conveyed that the decision letter for layoffs was carried out in accordance with the provisions and had been summoned twice properly and appropriately and the person concerned did not show good ethics so that he did not fulfill the summons made by the company.</li> <li>• The Labor Union rejected the dismissal decision made by the company and requested that the employee's initials HS be reinstated as appropriate</li> <li>• The company said that this matter will be submitted to the management of PT Daya Labuhan Indah first, and the results of the management's decision will be submitted to the union</li> </ul>

4.0	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>
4.1	<b>Formal Sign-off of Assessment Findings</b>
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p style="text-align: center;">Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Daya Labuhan Indah Management Representative</p>  <p><b>Zulham</b> Friday, 01 July 2022</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><b>Rizliani Aprianita Hasibuan</b> Friday, 01 July 2022</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Land Agency	Labuhanbatu Regency	-	Phone	21/06/2022	✓	
2	Plantation and Livestock Agency	Labuhanbatu Regency	-	Phone	21/06/2022	✓	
3	Employment Agency	Labuhanbatu Regency	-	Phone	21/06/2022	✓	
4	Environmental Agency	Labuhanbatu Regency	-	Phone	21/06/2022	✓	
5	Head of Sei Bilah Village	Labuhanbatu Regency	-	Phone	22/06/2022	✓	
6	Head of Sei Tampang Village	Labuhanbatu Regency	-	Phone	22/06/2022	✓	
7	Gender committee	PT Daya Labuhan Indah		Direct	22/06/2022	✓	
8	PUK.SP. PP-SPSI, PUK-FSPMI PB Serbundo	PT Daya Labuhan Indah	-	Direct	21/06/2022	✓	
9	DLI-2 POM <ul style="list-style-type: none"> <li>• 1 sterilizer operator</li> <li>• 1 Engine room operator</li> <li>• 1 Boiler operator</li> <li>• 1 WWTP operator</li> <li>• 1 WTP operator</li> <li>• 1 warehouse operator</li> </ul>	PT Daya Labuhan Indah	-	Direct	21/06/2022	✓	
10	Wonosari Estate <ul style="list-style-type: none"> <li>• 3 Harvester</li> <li>• 4 loose fruit pickers</li> <li>• 1 welder</li> <li>• 1 warehouse operator</li> </ul>	PT Daya Labuhan Indah	-	Direct	22/06/2022	✓	
11	Sei Deras Estate <ul style="list-style-type: none"> <li>• 2 Harvester</li> <li>• 3 operator Spray</li> <li>• 2 Supervisi</li> <li>• 1 Personel manuring</li> </ul>	PT Daya Labuhan Indah	-	Direct	21/06/2022	✓	
12	Cabang Dua Estate <ul style="list-style-type: none"> <li>• 9 workers (harvester &amp; loose fruit picker)</li> <li>• 10 workers (woodies upkeep manual)</li> <li>• 4 Manuring workers.</li> </ul>	PT Perkebunan Milano	-	Direct	22/06/2022	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
13	WALHI	-	informasi@walhi.or.id	Via email	16/06/2022		✓
14	WWF	-	supporter-service@wwf.or.id	Via email	16/06/2022		✓
15	Sawit Watch	-	info@sawitwatch.or.id	Via email	16/06/2022		✓
16	AMAN	-	rumahaman@aman.or.id	Via email	16/06/2022		✓



**Appendix 2. Assessment Program**

DATE /	20 – 25 June 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
<b>Monday, 20 June 2022</b>		
07.05 – 09.30	<b>JAKARTA (CGK) → MEDAN (KNO)</b>	<b>All Auditor</b>
10.00 – 11.00	<b>KNO → Medan</b>	
15.00 – 21.03	<b>Medan → Rantau Prapat (by Train)</b>	
21.03 – 23.00	<b>Rantau Prapat → PT DLI</b>	
<b>Tuesday, 21 June 2022</b>		
08.00 – 09.00	<b>Opening meeting</b> <ul style="list-style-type: none"> <li>Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li> </ul>	<b>All Auditor</b>
09.00 – 12.00	<b>Public Consultation</b> <ul style="list-style-type: none"> <li>Public consultation with stakeholder to relevant agency in Labuhanbatu Regency by phone</li> <li>Stakeholder consultation to affected communities surrounding the plantations and previous land owner</li> <li>Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier by phone</li> </ul>	<b>RSS</b>
	<b>Field Observation to Wonosari Estate</b> Aspect to be verified : <ul style="list-style-type: none"> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>Implementation of Occupational Health &amp; Safety Aspect</li> <li>Implementation of Employment Procedure and Mechanism Aspect</li> <li>Observation of Workers Facilities (Housing, School, Worship Place).</li> </ul>	<b>RAH/BYT/SPM</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 16.00	<b>Field observation to DLI 2 POM:</b> <ul style="list-style-type: none"> <li>Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO)</li> <li>Occupational Health &amp; Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond, LA)</li> <li>Implementation of Employment Procedure and Mechanism Aspect</li> </ul>	<b>RAH</b>  <b>SPM/RSS</b>  <b>BYT</b>
16.00 – 17.00	<ul style="list-style-type: none"> <li>Presentation of Daily Progress</li> </ul>	<b>All Auditor</b>
<b>Wednesday, 22 June 2022</b>		

DATE /	20 – 25 June 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 12.00	<b>Field Observation to Sei Deras Estate &amp; Cabang Dua Estate</b> Aspect to be verified : <ul style="list-style-type: none"> <li>• Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>• Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> <li>• Implementation of Employment Procedure and Mechanism Aspect</li> <li>• Observation of Workers Facilities (Housing, School, Worship Place).</li> </ul>	RAH  SPM/RSS  BYT
12.00 – 14.00	<b>Break</b>	
14.00 – 16.00	<ul style="list-style-type: none"> <li>• Document review and completing audit checklist.</li> </ul>	<b>All Auditor</b>
16.00 – 17.00	<ul style="list-style-type: none"> <li>• Presentation of Daily Progress.</li> </ul>	
<b>Thursday, 23 June 2022</b>		
08.00 – 12.00	<ul style="list-style-type: none"> <li>• Continue Field Visit (If needed)</li> <li>• Document review and completing audit checklist.</li> </ul>	<b>All Auditor</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 16.00	<ul style="list-style-type: none"> <li>• Document review and completing audit checklist.</li> </ul>	<b>All Auditor</b>
16.00 – 17.00	<ul style="list-style-type: none"> <li>• Presentation of Daily Progress.</li> </ul>	
<b>Friday, 24 June 2022</b>		
08.00 – 10.00	<b>Closing Meeting:</b> <ul style="list-style-type: none"> <li>• Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timeline of CAR's, Conclusion)/</li> <li>• Comments, Responses and Questions</li> </ul>	<b>All Auditor</b>
10.00 – 14.00	<b>PT DLI → Rantau Prapat</b>	<b>All Auditor</b>
14.45 – 20.50	<b>Rantau Prapat → Medan</b>	<b>All Auditor</b>
21.00 - .....	<b>Train Station → Hotel</b>	
<b>Saturday, 25 June 2022</b>		
07.00 – 08.30	<b>Medan → BANDARA Kualanamu</b>	<b>All Auditor</b>
10.30 – 12.50	<b>MEDAN (KNO) → JAKARTA (CGK)</b>	<b>All Auditor</b>