

Roundtable on Sustainable Palm Oil Certification
R S P O

[✓] Surveillance

Name of Management : Muara Wahau Palm Oil Mill – PT Kresna Duta Agroindo subsidiary of Golden Organisation
Agri Resources Ltd
Plantation Name : PT Kresna Duta Agroindo – Muara Wahau Estate and Gunung Kombeng Estate
Location : Village of Sukamaju, Sub District of Kongbeng, District of Kutai Timur, Province of Kalimantan Timur, Indonesia.
Certificate Code : **MUTU-RSPO/043**
Date of Certificate Issue : 26 June 2019 Date of License Issue : 26 September 2022
Date of Certificate Expiry : 25 June 2024 Date of License Expiry : 25 June 2023

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved By
ASA-1.3	20 to 25 June 2022	Briyogi Shadiwa (Lead Auditor), Rindu Reza Galih Rachmansyah, Erika Lucitawati, dan Alfiany Sukmawati	Ardiansyah	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.3	22 July 2022

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on March 12th, 2014 with registration number *ASI-ACC-055*

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Figure 1. Location Map of PT Kresna Duta Agroindo

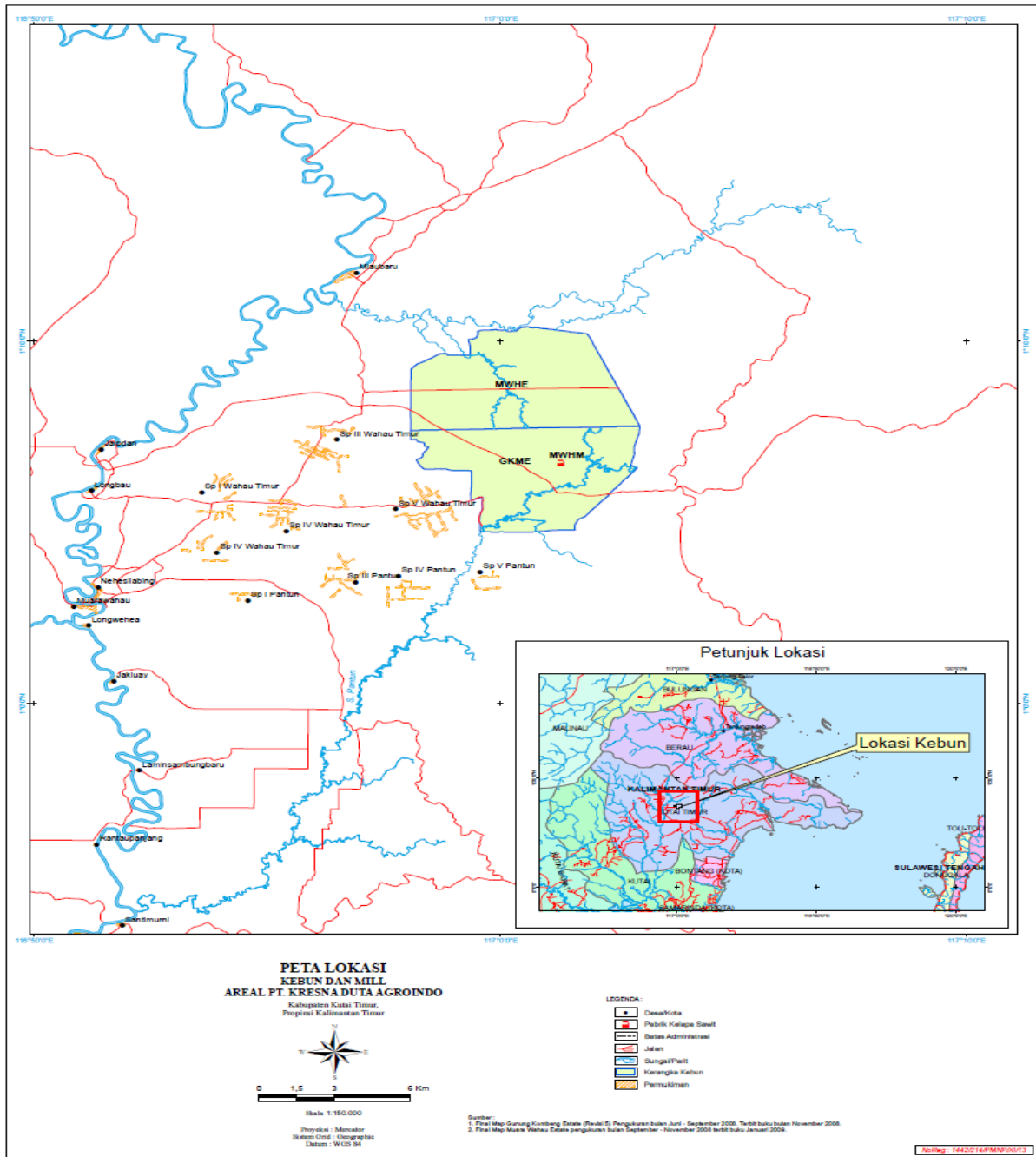


Figure 2. Operational Map of PT Kresna Duta Agroindo (Muara Wahau Estate)

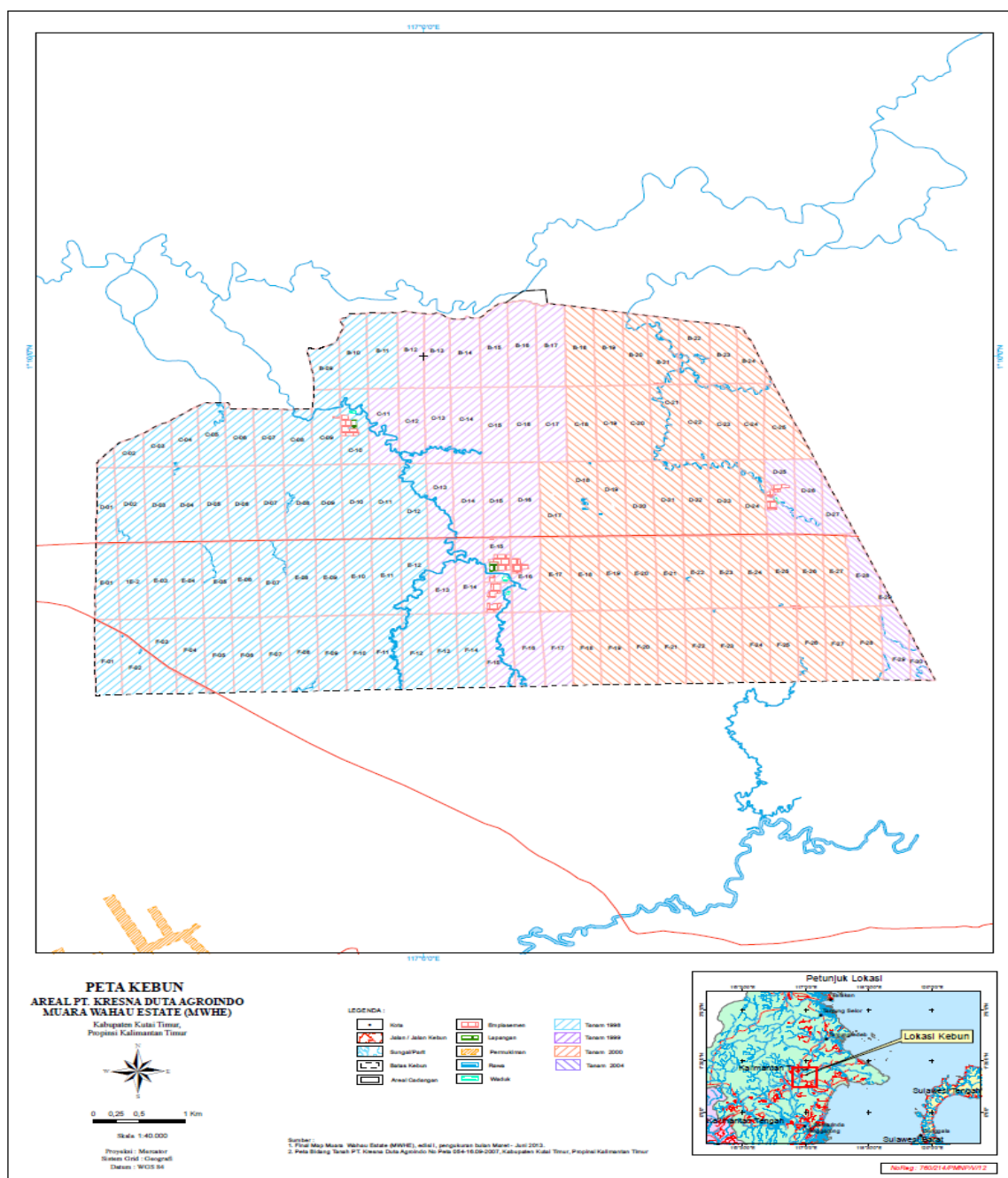
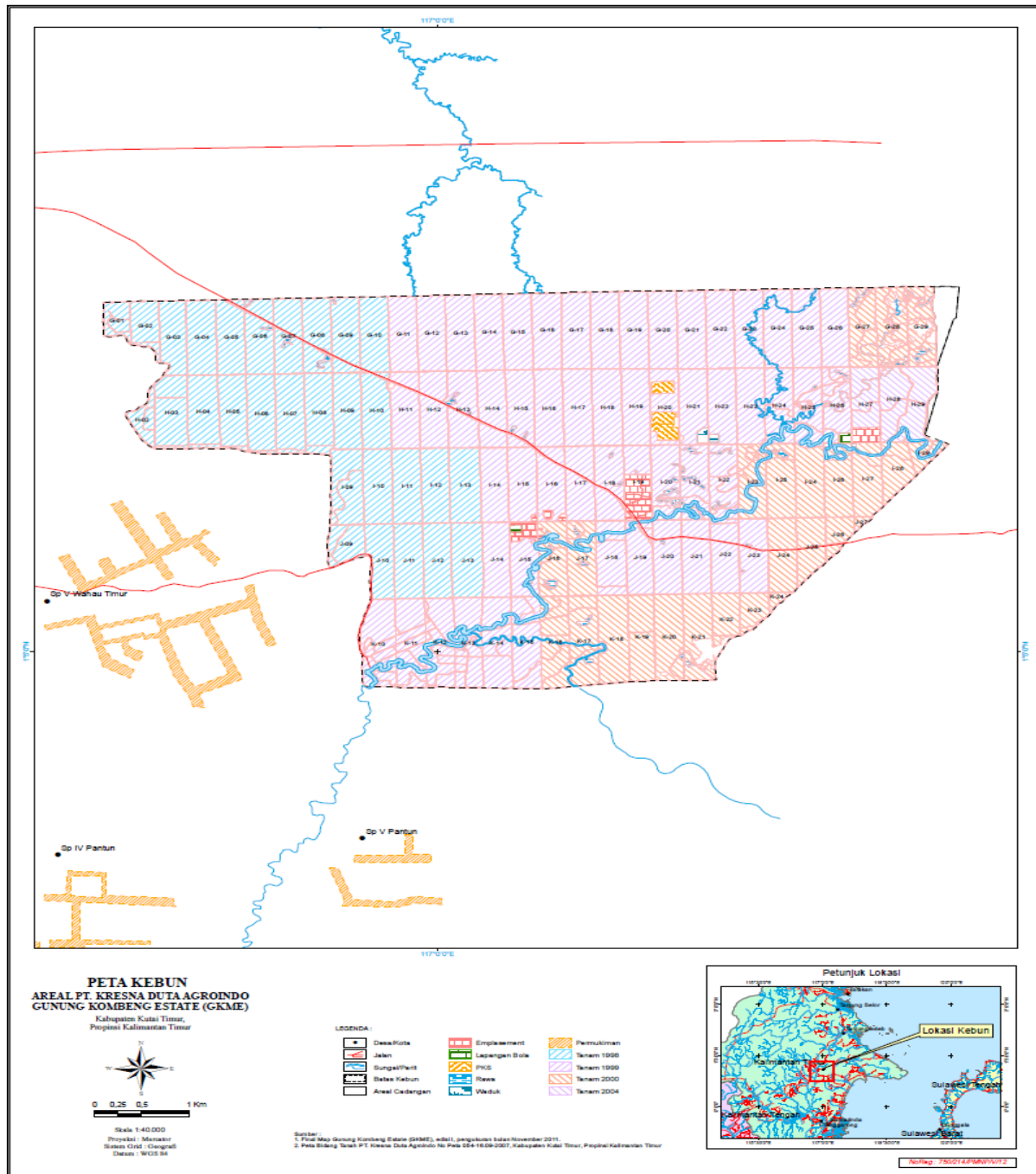


Figure 3. Operational Map of PT Kresna Duta Agroindo (Gunung Kombeng Estate)



Abbreviations Used

AMDAL	:	<i>Analisis Mengenai Dampak Lingkungan</i>
BAPEDALDA	:	<i>Badan Pengendali Dampak Lingkungan Daerah</i>
BOD	:	Biological oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i>
BPJN	:	<i>Badan Pertanahan Nasional</i>
BLH	:	Environmental Agency
CEO	:	<i>Chief Executive Officer</i>
CFO	:	<i>Chief Financial Officer</i>
CLA	:	Collective Labor Agreement
COD	:	Chemical Oxygen Demand
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
CV	:	Commanditaire Vennootschap
DISNAKERTRANS	:	<i>Dinas Tenaga Kerja dan Transmigrasi</i>
EFB	:	Empty Fruit Bunch
FFB	:	Fresh Fruit Bunch
GAPKI	:	<i>Gabungan Pengusaha Kelapa Sawit Indonesia</i>
GESP	:	GAR Environment and Social Policy
GHG	:	Greenhouse Gases
GKME	:	Gunung Kombeng Estate
GMKM	:	Gunung Kombeng Mill
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i>
HIRAC	:	Hazard Identification Risk Assessment Control
HIRADC	:	Hazard Identification Risk Assessment Determining Control
IOPRI	:	Indonesian Oil Palm Research Institute
IPM	:	Integrated Pest Management
IK	:	Work Instruction
ILO	:	International Labour Organization
ISPO	:	Indonesian Sustainable Palm Oil
JHT	:	<i>Jaminan Hari Tua</i>
JKK	:	<i>Jaminan Kecelakaan Kerja</i>
JKM	:	<i>Jaminan Kematian</i>
JP	:	<i>Jaminan Pensiun</i>
KAN	:	<i>Komite Akreditasi Nasional / National Accreditation Committee</i>
KER	:	<i>Kernel Extraction Rate</i>
KUD	:	Koperasi Unit Desa
LA	:	Land Application
LD50	:	Lethal Dose 50
LSU	:	Leaf Sampling Unit
MD	:	Managing Director
MSDS	:	Material Safety Data Sheet
MWHE	:	Muara Wahau Estate
MWHM	:	Muara Wahau Mill
NGO	:	Non-Governmental Organization
OER	:	<i>Oil Extraction Rate</i>
OHS	:	Occupational Safety and Health
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i>
PDBL	:	<i>Penyaluran Dana Bina Lingkungan – kind of CSR that managed by Head Office of PTPN V</i>

PERMENKES	:	<i>Peraturan Menteri Kesehatan</i>
PERMENAKER	:	<i>Peraturan Menteri Tenaga Kerja</i>
PKWT	:	<i>Perjanjian Kerja Waktu Tertentu</i>
POM	:	<i>Palm Oil Mill</i>
POME	:	<i>Palm Oil Mill Effluent</i>
PPE	:	<i>Personal Protective Equipment</i>
PT KDA	:	<i>PT Kresna Duta Agroindo</i>
RKL/RPL	:	<i>Environmental Management Plan / Environmental Monitoring Plan</i>
RTE	:	<i>Rare, threatened and endangered species</i>
RSPO	:	<i>Roundtable on Sustainable Palm Oil</i>
SBU	:	<i>Satuan Bisnis Usaha</i>
SCCS	:	<i>Supply Chain Certification System</i>
SEL	:	<i>Environmental Evaluation Study</i>
SIA	:	<i>Study Impacts Assessment</i>
SOP	:	<i>Standard Operating Procedure</i>
SPK	:	<i>Surat Perjanjian Kerja (Agreement Letter)</i>
SK	:	<i>Surat Keputusan</i>
SSE	:	<i>Sustainability and Stakeholder Engagement</i>
SSU	:	<i>Soil Sampling Unit</i>
UHL	:	<i>Upah Hidup Layak</i>
UKL	:	<i>Upaya Pengelolaan Lingkungan Hidup</i>
UPL	:	<i>Upaya Pemantauan Lingkungan Hidup</i>
UN	:	<i>United Nation</i>
WHO	:	<i>World Health Organization</i>
WI	:	<i>Work Instruction</i>
WLTK	:	<i>Wajib Lapor Ketenagakerjaan</i>
WTP	:	<i>Water Treatment Plan</i>
WWTP	:	<i>Waste Water Treatment Plant</i>

1.0	SCOPE of the CERTIFICATION ASSESSMENT										
1.1	Assessment Standard Used	<ul style="list-style-type: none"> Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020. RSPO Certification System for Principles and Criteria, 12 November 2020. 									
1.2	Organisation Information										
1.2.1	Organisation name listed in the certificate	Muara Wahau Mill – PT Kresna Duta Agroindo subsidiary of Golden Agri Resources Ltd									
1.2.2	Contact person	Yahya Mustakim									
1.2.3	Organisation address and site address	RSPO registered company: 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535 Liaison Office: Sinar Mas Land Plaza, Tower II, 30th Floor Jl. MH Thamrin No. 51, Jakarta 10350, Indonesia									
1.2.4	Telephone	(+62-21) 50338899									
1.2.5	Fax	(+62-21) 50389999									
1.2.6	E-mail	Yahya-mustakim@sinarmas-agri.com									
1.2.7	Web page address	https://goldenagri.com.sg/									
1.2.8	Management Representative who completed the application for certification	Yahya Mustakim (Head of Sustainability Management System and Certification Operations Sustainability)									
1.2.9	Registered as RSPO member	1-0096-11-000-00 – 31 March 2011									
1.3	Type of Assessment										
1.3.1	Scope of Assessment and Number of Management Unit	Muara Wahau Mill and 2 Estate (Muara Wahau Estate & Gunung Kongbeng Estate)									
1.3.2	Type of certificate	Single									
1.4	Locations of Mill and Plantation										
1.4.1	Location of Mill										
	Name of Mill	Location	<table border="1"> <thead> <tr> <th colspan="2">Coordinate</th> </tr> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>N 01° 06' 40.58"</td> <td>E 117° 01' 15.52"</td> </tr> </tbody> </table>	Coordinate		Latitude	Longitude	N 01° 06' 40.58"	E 117° 01' 15.52"		
Coordinate											
Latitude	Longitude										
N 01° 06' 40.58"	E 117° 01' 15.52"										
	Muara Wahau Mill	Sukamaju Village, Kongbeng Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia									
1.4.2	Location of Certification Scope of Supply Base										
	Name of Supply Base	Location	<table border="1"> <thead> <tr> <th colspan="2">Coordinate</th> </tr> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>N 01° 08' 09.81"</td> <td>E 117° 00' 23.38"</td> </tr> <tr> <td>N 01° 06' 09"</td> <td>E 117° 01' 13.12"</td> </tr> </tbody> </table>	Coordinate		Latitude	Longitude	N 01° 08' 09.81"	E 117° 00' 23.38"	N 01° 06' 09"	E 117° 01' 13.12"
Coordinate											
Latitude	Longitude										
N 01° 08' 09.81"	E 117° 00' 23.38"										
N 01° 06' 09"	E 117° 01' 13.12"										
	Muara Wahau Estate	Makmur Jaya Village, Kongbeng Sub-District, Kutai Timur District, Kalimantan Timur Province, Indonesia									
	Gunung Kongbeng Estate	Sukamaju Village, Kongbeng Sub-District, Kutai Timur District, Kalimantan Timur									

		Province, Indonesia					
1.5	Description of Area Statement						
1.5.1	Tenure						
	• State		HGU = 6,873.44 Ha HGB = 4.10 Ha Total = 6,877.54 Ha				
	• Community		- Ha				
1.5.2	Area Statement						
	• Total area		6,877.54 Ha				
	• Mature area		6,614.60 Ha				
	• Immature area		- Ha				
	• Mill		4.10 Ha				
	• Building and Housing		43.86 Ha				
	• Infrastructure (road and bridge)		152.55 Ha				
	• River		33.04 Ha				
	• Shrubs		3.81 Ha				
	• Steep Area		9.74 Ha				
	• Gravel Area		1.67 Ha				
	• Greenery Area		0.77 Ha				
	• Occupation		13.40 Ha				
	*HCV identified is riparian area, has included to the planted area an 253.08 Ha.						
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)					
		Muara Wahau	Gunung Kongbeng		Total		
	1998	1,390.04	816.90		2,206.94		
	1999	701.62	1,605.46		2,307.08		
	2000	1,299.99	595.51		1,895.50		
	2004	130.18	74.90		205.08		
	TOTAL	3,521.83	3,092.77		6,614.60		
1.6.2	New Planting area after January 2010		- Ha				
1.6.3	Planting Cycle		2 nd Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Muara Wahau	60	203,494.94	42,400.14	20.84	11,293.03	5.55
*Production data source from 12 months before assessment (June 2021 – May 2022)							
1.7.2	Description of Certification Scope of Supply Base						

	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Muara Wahau Estate	3,603.12	3,521.83	57,349.46	16.28	57,349.46	100
	Gunung Kongbeng Estate	3,274.42	3,092.77	57,469.57	18.58	57,469.57	100
	TOTAL	6,877.54	6,614.60	114,819.03	17.36	114,819.03	100
	<i>*Production data source from 12 months before assessment (June 2021 – May 2022)</i>						
1.7.3	FFB description from other source						
	Name of sources/Organisation (RSPO certified / non-certified)	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Pantun Mas Estate (RSPO Certified)	PT Tapian Nadengan	-	4,436.75	382.79		
	Gunung Kombeng Plasma (non-certified)	PT Kresna Duta Agroindo	1,168	2,214.00	39,316.92		
	Koperasi Jasa Mutiara Kongbeng (non-certified)	Independent Smallholder	-	-	6,259.80		
	Koperasi Cahaya Gunung Kongbeng (non-certified)	Independent Smallholder	-	-	122.64		
	Kongbeng Bersatu (non-certified)	Independent Smallholder	-	-	23,580.11		
	Koperasi Palma Karya Mandiri (non-certified)	Independent Smallholder	-	-	1,512.64		
	Koperasi Bina Sawit Mandiri (non-certified)	Independent Smallholder	-	-	1,976.24		
	Koperasi Perintis Jaya Satu (non-certified)	Independent Smallholder	-	-	458.83		
	Koperasi Setia Sawit Kutim (non-certified)	Independent Smallholder	-	-	6,147.57		
	Koperasi Usaha Tani (non-certified)	Independent Smallholder	-	-	2,676.76		
	Koperasi Tunas Agri(non-certified)	Independent Smallholder	-	-	1,413.93		
	Joya Anugerah Jaya (non-certified)	Independent Smallholder	-	-	1,100.47		
	CV. Three Putra (non-certified)	Independent Smallholder	-	-	3,301.01		
	Siti Aisyah (non-certified)	Independent Smallholder	-	-	411.67		
		TOTAL					88,661.38
	<i>*Production data source from 12 months before assessment (June 2021 – May 2022)</i>						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (June 2021 to May 2022) (MT)		
	FFB Processed		155,500		115,201.82		
	CPO Production		34,202		24,246.89		
	Palm Kernel (PK) Production		8,995		6,736.17		

*There's remaining stock of CSPK at the end of May 2021 as amount as 337.35 MT.								
1.8.2	Product selling							
	Type of selling product	Actual selling product for last year (June 2021 to May 2022) (MT)						
	CSPK sold as RSPO certified product	0						
	CSPK sold as RSPO certified product	6,461.63						
	CSPK sold under other scheme	22,573.58						
	CSPK sold under other scheme	0						
	CSPK sold as conventional	0						
	CSPK sold as conventional	0						
1.8.3	Estimate of Certified FFB Claim							
	Name of Estate(s)	Total Area (Ha)	Planted / Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Muara Wahau Estate	3,603.12	3,521.83	60,000	17.03			
	Gunung Kongbeng Estate	3,274.42	3,092.77	59,000	19.07			
	TOTAL	6,877.54	6,614.60	119,000	17.99			
	*Projected FFB production for 12 months of certificate							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO Out put (tonnes)	Extraction (%)	Palm Kernel Out put (tonnes)	Extraction (%)	Supply Chain Module
	Muara Wahau Mill	60	119,000	24,990	21.00	6,545	5.5	MB
	*Projected CSPO and CSPK production for 12 months of certificate							
1.9	Other Certifications							
	ISCC		EU-ISCC-Cert-ID215-23210522					
	ISPO		ISPO certificate No. MUTU-ISPO/012 by Mutuagung Lestari (RS-1) issued on 05 December 2018 valid until 04 December 2023.					
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status			
Mill	Time Bound Plan							
Pangkalan Panji Mill (PT Sawit Mas Sejahtera)	2013	Sawit Mas Estate	2013	Sumatera Selatan Province	Certified			
		Sawit Mas Estate (HGU on progress – 2,291 Ha)	2022		-			
Bumi Sawit Mill (PT Bumi Sawit Permai)	2013	Bumi Sawit Estate	2013	Sumatera Selatan Province	Certified			
		Bumi Sawit Estate (HGU on progress – 773.39 Ha)	2022		-			
Muara Kandis Mill (PT Djuanda Sawit Lestari)	2013	Muara Tawas Estate	2013	Sumatera Selatan Province	Certified			
		Muara Kandis Estate	2013		Certified			

		Muara Kandis Estate (HGU on progress – 418.49 Ha)	2022		-
		Muara Tawas Estate (HGU on progress – 57.7 Ha)	2022		-
		Smallholder (KKPA Pandawa)	2022		-
Sungai Rungau Mill (PT Sumber Indah Perkasa)	2013	Sungai Rungau Estate	2013	Kalimantan Tengah Province	Certified
		Sungai Seruyan Estate	2013		Certified
		Terawan Estate	2013		Certified
		Tangar Estate	2013		Certified
		Bukit Tiga Estate	2013		Certified
Bukit Perak Mill (PT Bumi Permai Lestari)	2013	Bukit Perak Estate	2013	Bangka Belitung Province	Certified
		Bukit Permata Estate	2013		Certified
		Bukit Permai Estate (PT Agrolestari Subur Sejahtera)	2024		-
		Bukit Lestari estate (PT Agrolestari Hijau Sentosa)	2024		-
Tanjung Kembiri Mill (PT Forestalestari Dwikarya)	2013	Tanjung Kembiri Estate	2013	Bangka Belitung Province	Certified
		Tanjung Rusa Estate	2013		Certified
		Tanjung Rusa Estate (HGU on process 48.81 Ha)	2023		-
		Tanjung Sawit Estate (PT Palmindo Biliton Berjaya)	2023		-
		Tanjung Sawit Plasma (PT Palmindo Biliton Berjaya)	2023		-
		Tanjung Rusa KKPA	2023		-
Sungai Buaya Mill (PT Sumber Indah Perkasa)	2014	Sungai Buaya Estate	2014	Lampung Province	Certified
		Sungai Buaya Estate (HGU on process – 155.46 Ha)	2022		-
		Smallholder (KKPA Gedung Aji Lama)	2014		Certified
		Smallholder (KKPA Mesuji)	2014		Certified
Sungai Merah Mill (PT Sumber Indah Perkasa)	2014	Sungai Merah Estate	2014	Lampung Province	Certified
		Sungai Merah Estate (HGU on process – 241.54 Ha)	2022		-
		Smallholder (KKPA Gedung Aji Baru)	2014		Certified
	2023	Cendrawasih Estate	2023	Papua Province	ST-1

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

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

		Sungai Ayawan Estate	2025		-
		Sungai Nusa Estate	2025		-
Padang Halaban Mill (PT SMART Tbk)	2011	Padang Halaban Estate	2011	Sumatera Utara Province	Certified
		Pernantian Estate	2011		Certified
		Adipati Estate	2011		Certified
		Kanopan Ulu Estate	2011		Certified
Batu Ampar Mill (PT SMART Tbk)	2012	Batu Ampar Estate	2012	Kalimantan Selatan Province	Certified
		Batu Mulia Estate	2012		Certified
		Sungai Panci Estate	2012		Certified
		Sungai Panci KKPA	2012		Certified
Tanah Laut Mill (PT SMART Tbk)	2012	Tanah Laut Estate	2012	Kalimantan Selatan Province	Certified
		Kintapura Estate	2012		Certified
		Kintapura Estate (HGU on process - 636.33 Ha)	2022		-
Langga Payung Mill (PT Tapian Nadenggan)	2012	Langga Payung Estate	2012	Sumatera Utara Province	Certified
		Paya Baung Estate	2012		Certified
		Normark Estate	2012		Certified
Hanau Mill (PT Tapian Nadenggan)	2012	Hanau Estate	2012	Kalimantan Tengah Province	Certified
		Tasik Mas Estate	2012		Certified
		Tanjung Paring Estate	2012		Certified
		Langadang Estate	2012		Certified
		Medang Sari Estate (PT Satya Kisma Usaha)	2025		-
Semilar Mill (PT Tapian Nadenggan)	2013	Semilar Estate	2013	Kalimantan Tengah Province	Certified
		Sei Rindu Estate	2013		Certified
		Mandang Estate (PT Buana Arta Sejahtera)	2013		Certified
		Puri Estate (PT Buana Arta Sejahtera)	2013		Certified
Jak Luay Mill (PT Tapian Nadenggan)	2015	Pantun Mas Estate	2015	Kalimantan Timur Province	Certified
		Jak Luay Estate	2015		Certified
		Jak Luay KKPA	2023		-
		Long Buluh Estate	2015		Certified
		Long Buluh Estate (HGU on progress - 329.66 Ha)	2023		-
		Bukit Subur Estate	2015		Certified
		Bukit Subur Estate (HCV identification on process - 569.62 Ha)	2023		-
		Bukit Subur KKPA	2023		-

Leidong West Mill (PT MP Leidong West Indonesia)	2014	Leidong West Utara Estate	2014	Bangka Belitung Province	Certified
		Leidong West Selatan Estate	2014		Certified
		Bukit Intan Estate (PT Bumipermai Lestari)	2014		Certified
		Bukit Mas Estate (PT Bumipermai Lestari)	2014		Certified
Muara Wahau Mill (PT Kresna Duta Agroindo)	2014	Muara Wahau Estate	2014	Kalimantan Timur Province	Certified
		Gunung Kombeng	2014		Certified
Gunung Kombeng Mill (PT Kresna Duta Agroindo)	2022	Gunung Kombeng KKPA	2024	Kalimantan Timur Province	-
Rantau Panjang (PT Kresna Duta Agroindo)	2022	Rantau Panjang Estate	2022	Kalimantan Timur Province	-
		Rantau Panjang KKPA	2024		-
Jelatang Mill (PT Kresna Duta Agroindo)	2014	Bangko Estate	2014	Jambi Province	Certified
Pelakar Mill (PT Kresna Duta Agroindo)	2020	Pelakar Estate	2020	Jambi Province	Certified
		Batang Merangin Estate	2020		Certified
		Tiga Serumpun KKPA	2023		-
Langling Mill (PT Kresna Duta Agroindo)	2014	Bangko Estate	2014	Jambi Province	Certified
		Batang Gading Estate (PT Satya Kisma Usaha)	2023		-
		Batang Gading KKPA (PT Satya Kisma Usaha)	2024		-
Sungai Bengkal Mill (PT Satya Kisma Usaha)	2015	Sungai Bengkal Estate	2015	Jambi Province	Certified
		Sungai Bengkal Estate (RaCP process - 610.88 Ha)	2023		-
		Sungai Bengkal KKPA	2015		Certified
		Sungai Bengkal KKPA (RaCP process – 1,063.92 Ha)	2023		-
		Muara Kilis Estate	2015		Certified
		Muara Kilis Estate (RaCP process - 1,460.54 Ha)	2023		-
		Kilis KKPA	2023		-
Bukit Kapur Mill (PT SMART Tbk)	2022	Bukit Kapur Estate	2023	Kalimantan Selatan Province	ST-1
		Sungai Cantung Estate	2023		ST-1
Samsam Mill (PT Ivo Mas Tunggal)	2009	Samsam Estate	2009	Riau Province	Certified
		Samsam Estate (HGU on progress – 29.09 Ha)	2022		-

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

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

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

- Sawita Mill and supply bases are postponed to 2022 due to still in process for HGU.
- Sawita KKPA supply base of Sawita Mill are postponed to 2024 due to still in process for land rights (SHM).
- Kenari Mill and supply bases are postponed to 2023 due to the mill is fully operational in 2025.
- Sungai Air Jernih Mill and supply bases are postponed to 2023 due to still in process for legality documents.

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

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

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

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

1.10.2 Progress of Associated Smallholders and Outgrowers for Certifiable Standard

There are no smallholders on this certification scope.

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.3	<p>1. Briyogi Shadiwa (Lead Auditor). Indonesian citizens. Associate Degree of Oil Palm Plantation. He has work experience since 2009 in several private oil palm plantation companies in Indonesia as Assistant Agronomy and Agronomy Quality Control. The trainings that have been attended include: RSPO Lead Auditor Course by Checkmark, ISPO Auditor Training by LPP, Lead Auditor ISO 9001: 2015, RSPO Supply Chain Certification Training Course by Checkmark, Lead Auditor ISO 14001: 2015, SMK3 Awareness, OHSAS 18001 Awareness: 2007, SA 8000 Awareness, ISO 45001: 2018 Awareness and General OHS Expert Training. In this audit, he verified legality, social, partial audit and time-bound plan aspect.</p> <p>2. Rindu Galih Rezza Rachmansyah (Auditor) Indonesian citizen, Bachelor of Agriculture with major in Plant Pest and Disease. Has one year experience as Field Expert in Pesticide Company and 3 years' experience in Industrial Forest Management, Forest Rehabilitation and Reclamation on Indonesia Stated Owned Company as Assistant. Training which had attended including Lead Auditor ISO 9001, ISO 14001, ISO 17021, ISO 19011, SA 8000, Lead Auditor ISPO, Lead Auditor RSPO, RaCP & NPP Awareness and OHSAS 18001:2007. Has involved in several audit activities related to sustainable palm oil since 2017 in the aspects of Best Management Practices (BMP), social, worker welfare and OHS. During assessment, he assigned to verification towards BMP, OHS, and social aspect.</p> <p>3. Erika Lucitawati (Auditor). Indonesian citizen. Bachelor of Engineering with major in Environmental Engineering. The trainings that have been attended include ISPO Lead Auditor Training, RSPO Lead Auditor Training, In House Training of ISO 19011: 2018, ISO 17021: 2015, ISO 17065: 2012, ISO 9001: 2015, ISO 14001: 2015, ISO 45001: 2018, and The Supervision of Occupational Health and Safety Training. During this assessment, she verified worker welfare and transparency.</p> <p>4. Alfiany Sukmawati (Auditor Trainee). Indonesian citizens. Bachelor of Public Health, Department of Environmental Health, University of Indonesia. Has 5 years working experience in safety and environmental specialist for industry. Has attended auditor training in ISO 14001, AMDAL A & B, OHSAS, ISO 9001, Awareness ISO 17021, Awareness ISO 17065, Awareness ISO 9001, Awareness ISO 45001, and Awareness ISO 19011. Has participated in several simulations of audit activities related to the certification system for sustainable palm oil plantations with environmental aspects. In this audit activity, verify environmental, GHG and conservation aspect under the supervision of the Lead Auditor.</p> <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1.3	<p>Number of auditors: 3 Auditors & 1 Auditor Trainee</p> <p>Number of days for Onsite ASA-1.3: 4 days</p> <p>Number of working days for Onsite ASA-1.3: 12 Working days</p>
2.2.2	Assessment Process
ASA-1.3	<p>The assessment was conducted by measuring the implementation of certification system and standard conducted by PT Kresna Duta Agroindo, Muara Wahau POM Unit Certification based on:</p> <ul style="list-style-type: none"> RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20th April 2020 RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020 <p>Additional Documents:</p> <ul style="list-style-type: none"> RSPO Notice to CB on RSPO P&C On-site & Remote Audits, on 24th March 2020 Contingency RSPO Audit Procedure (This procedure is applicable when force majeure (such as pandemics, natural disasters, civil unrest, etc.) preventing the audit team from conducting field verifications) 25 August 2020 Contingency RSPO Audit Procedure for RSPO Principles & Criteria and Independent Smallholder Standard

(Version 2) Approved by Assurance Standing Committee on 22 October 2021

The scope of certification of PT Kresna Duta Agroindo consist of one mill (Muara Wahau Mill) and two estates (Muara Wahau and Gunung Kongbeng Estate)

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

The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site. Some opportunities for improvement of the results ASA-1.3 by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase Recertification. Improvement of findings from ASA-1.2 findings were observed by auditors at this ASA-1.3 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.3.

The opening meeting was held on 21 June 2022. As for the participants who attended the opening meeting included the Production Controller, Regional Controller, Estate and Mill Managers, Support Team from Jakarta and other staff. Closing meeting was held on 24 June 2022 attended by the same participants as the opening meeting. Management PT Kresna Duta Agroindo accept all the onsite ASA-1.3 audit results.

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

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

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

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

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

The assessment program please find Appendix 2.

2.2.3	Locations of Assessment
ASA-1.3	<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><u>Muara Wahau POM</u></p>

- **Sortation Station.** Observations and interviews with workers related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Loading Ramp Station.** Observations related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Sterilizer Station.** Observations and interviews with workers related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Tipper and Thresher Station.** Observations related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Press Station.** Observations and interviews with workers related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Clarification Station.** Observations and interviews with workers related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Kernel Station.** Observations and interviews with workers related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Engine Room Station.** Observations and interviews with workers related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Boiler Station.** Observations and interviews with workers related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Hydrant Simulation in WTP Station.** Observations and interviews with workers related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Solar Tank.** Observations related to emergency response procedures, availability and condition of emergency response equipment and environmental management.
- **WTP.** Observations and interview related to OHS, environmental, and worker welfare aspects.
- **Workshop.** Observation and interview related to OHS, environmental, and worker welfare aspects.
- **Hazardous and Toxic Waste Temporary Storage.** Observation related to implementation of procedures, OHS and environmental aspects.
- **Chemical Storage.** Observation related to OHS, environmental, and worker welfare aspects.
- **Oil and Fuel Storage.** Observation related to implementation of procedures, OHS and environmental aspects.
- **General Storage.** Observation related to implementation of procedures, OHS and environmental aspects.
- **Hydrant Simulation in Loading Ramp Station.** Observation related to implementation of procedures and condition or firefighting tools.
- **WWTP.** Field observations related to Ban to entry to WWTP, run off, testing of effluent. Officers equipped with PPE and Recording of effluent debit effluent.
- **Empty Bunch Area.** Observation related to implementation of procedures, OHS and environmental aspects.
- **Emplacement.** Observation of the availability of infrastructure such as employee housing facilities, water facilities, educational facilities, religious facilities, health facilities and sports facilities.

Muara Wahau Estate

- **Circle Path Spraying in Division 2 Block F17.** Observations and interviews with workers related to work procedures, environmental management, OHS, employment and complaint mechanisms.
- **Harvesting in Division 2 Block D15.** Observations and interviews with workers related to work procedures, environmental management, OHS, employment and complaint mechanisms.
- **Erosion Stack in Division 3 Block D27.** Observations related to monitoring the reduction of soil erosion in undulating areas along with their management.
- **Beneficial Plant (Antigonon sp and Turnera subulata) in Division 3 Block E 22/23 and D22/23.** Observations related to biological control to control UPDKS by maximizing host plants from natural enemies of these pests along with their treatment.
- **Manual Upkeep for Road Maintenance (Fertilizer workers due to rain has been diverted) in Division 3 Block E 21/22.** Observations and interviews with workers related to work procedures, environmental management, OHS, employment and complaint mechanisms.
- **Barn Owl Box in Division 3 Block F21.** Observations related to biological control using the natural enemy of rats, namely owls and monitoring.

- **Mechanized FFB Transport Activities (Grabber) in Division 2 Block E11/12.** Observations and interviews with workers related to work procedures, environmental management, OHS, employment and complaint mechanisms.
- **Fuel Storage.** Observation related to implementation of procedures, OHS and environmental aspects.
- **Clinic.** Observation related to OHS, environmental, and worker welfare aspects.
- **Hazardous and Toxic Waste Temporary Storage.** Observation related to implementation of procedures, OHS and environmental aspects.
- **Pesticide Storage.** Observation related to implementation of procedures, OHS and environmental aspects.
- **Central Storage.** Observation related to implementation of procedures, OHS and environmental aspects.
- **Workshop.** Observation related to implementation of procedures, OHS and environmental aspects.
- **Oil Storage.** Observation related to implementation of procedures, OHS and environmental aspects.
- **Fertilizer Storage.** Observation related to implementation of procedures, OHS and environmental aspects.
- **Housing No 1 (for Division 1 and 4).** Observation related to availability of infrastructure such as employee housing facilities, water facilities, educational facilities, religious facilities, health facilities and sports facilities.
- **Childcare in Housing No. 1.** Observation related to condition childcare, OHS and worker welfare aspects.
- **Housing No 2 (for Division 2, 3 and 5).** Observation related to availability of infrastructure such as employee housing facilities, water facilities, educational facilities, religious facilities, health facilities and sports facilities.
- **PPE Warehouse and Mixing Area (Division 2 & 3).** Observation related to implementation of procedures, OHS and environmental aspects.
- **Landfill block B 18 Division 5.** Observation related to domestic waste management.
- **Block C/D 12: Elang River (HCV Area).** Observation of HCV management.
- **Block C10: Elang River (HCV Area).** Observation of HCV management
- **Block C8 (HCV Area).** Observation of HCV management

Gunung Kombeng Estate

- **Harvesting in Division 3 Block J17.** Observations and interviews with workers related to work procedures, environmental management, OHS, employment and complaint mechanisms.
- **Circle Path Spraying in Division 3 Block I14.15.** Observations and interviews with workers related to work procedures, environmental management, OHS, employment and complaint mechanisms.
- **Mechanized FFB Transport Activities (Grabber) in Division 1 Block H14/15.** Observations and interviews with workers related to work procedures, environmental management, OHS, employment and complaint mechanisms.
- **Barn Owl Box in Division 1 Block H14.** Observations related to biological control using the natural enemy of rats, namely owls and monitoring.
- **Manual Upkeep for Road Maintenance (Fertilizer workers due to rain has been diverted) in Division 1 Block H16/17.** Observations and interviews with workers related to work procedures, environmental management, OHS, employment and complaint mechanisms.
- **Pest and Disease Census in Division 1 Block H16/17.** Observations and interviews with workers related to work procedures, environmental management, OHS, employment and complaint mechanisms.
- **Landfill in Division 1 Block I11.** Observations related to domestic waste management and monitoring.
- **Fire Watchtower in Division 1 Block J12.** Observations related to fire monitoring and facility.
- **Fuel Storage.** Observation related to implementation of procedures, OHS and environmental aspects.
- **Hazardous and Toxic Waste Temporary Storage.** Observation related to implementation of procedures, OHS and environmental aspects.
- **Pesticide Storage.** Observation related to implementation of procedures, OHS and environmental aspects.
- **Central Storage.** Observation related to implementation of procedures, OHS and environmental aspects.
- **Workshop.** Observation related to implementation of procedures, OHS and environmental aspects.
- **Oil Storage.** Observation related to implementation of procedures, OHS and environmental aspects.
- **Fertilizer Storage.** Observation related to implementation of procedures, OHS and environmental aspects.
- **Housing No 1 (for Division 1 and 3).** Observation related to availability of infrastructure such as employee housing facilities, water facilities, educational facilities, religious facilities, health facilities and sports facilities.
- **Housing No 2 (for Division 2 and 4).** Observation related to availability of infrastructure such as employee housing facilities, water facilities, educational facilities, religious facilities, health facilities and sports facilities.

	<ul style="list-style-type: none"> • PPE Warehouse and Mixing Area (Division 2 & 3). Observation related to implementation of procedures, OHS and environmental aspects. • WTP. Observation related to implementation of procedures, OHS and environmental aspects. • Block J16/17: Pantun River (HCV Area). Observation of HCV • Block I22: Pantun River (HCV Area). Observation of HCV • Land Application G20. Observation related to implementation of procedures, OHS and environmental aspects. • Monitoring Well for Land Application No. 1. Observation related to implementation of procedures, water quality, and environmental aspects.
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1.3	<p>Consultation of stakeholders for PT KDA held by:</p> <ol style="list-style-type: none"> 1. Public Notification on Website PT Mutuagung Lestari 2. Public consultation with government agencies of Kutai Timur District (Agriculture Agency, Labor Agency, and Environmental Agency) on 21 June 2022 3. Public consultation by interview with locals of the nearby village (Miau Baru Village and Sukamaju Village) and local contractor on 21 June 2022 4. Consultation and interview with Internal Stakeholder (labor union and gender committee) on 21 June 2022 5. Consultation with NGO (WWF, Sawit Watch, Wahana Lingkungan Hidup Indonesia, Jaringan Kerja Penyelamatan Hutan Riau, dan Jaringan Masyarakat Gambut Riau) via email on 14 June 2022. <p>Numbers of input from stakeholders were clarified by PT KDA.</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit ASA-1.4 will be conducted eight (8) months to twelve (12) months after date of annual license.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Muara Wahau Mill - PT Kresna Duta Agroindo subsidiary of Golden Agri Resources Ltd operation consisting of one (1) mill and two (2) oil palm estates.

During the assessment, there is no non-conformity (major/minor), only six (6) opportunities for improvement were identified.

MUTUAGUNG LESTARI found that Muara Wahau Mill – PT Kresna Duta Agroindo subsidiary of Golden Agri Resources Ltd complied with the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification System for Principles and Criteria and RSPO Independent Smallholder Standards, Endorsed by the RSPO Board of Governors on 12 November 2020.

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1	The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1	<p>Certification Unit has procedure and has appointed person in charge in the requests for information from stakeholders (SOP/SMART/UMUM/SADVI/004). The Certification Unit also responded to information requests with maximum time of 3 days since mail received. Based on verification document and interview with external stakeholders, management always responds the information request no longer than 3 working days.</p> <p>The types of documents that can be accessed and given to stakeholders are included in the information list for stakeholders, such as public documents, legal document, environmental documents (environmental policy, environmental management, and monitoring report, etc.), social document, OHS policy and program, and manpower documents. These documents are available in Estate and Mill office. The company has provided information that can be accessed by the public according to relevant stakeholders such as land use rights, EHS documents, environmental documents, HCV documents, waste management documents, environmental management, employment etc. For example; periodically, unit certification sends monitoring and management documents to the related institutions such as; Environment Agency, BKSDA, and Manpower Office.</p>	
1.1.2; 1.1.3	<p>The unit of certification has list of documents that can be accessed publicly listed in Procedure of Communication, Participation, and Consultation (SOP/SMART/UMUM/SADVI/004) 1 Juli 2014. The submission period for suggestions is no later than 1 week after the letter is received (from the Unit Head to the relevant Department). Respond no later than 3 weeks after the letter is received. Unit of certification can show records of providing information to relevant agencies in the form of routine reports. All available documents are information that can be accessed by the public by submitting an official letter of request for information. All information is provided in Bahasa.</p>	
1.1.4	<p>From the results of the document review on the recording of incoming and outgoing mail logs in 2022, there were no requests for information from stakeholders. However, there are some notes regarding donation requests and routine reporting to related institutions.</p> <p>The unit of certification has recorded in the Communication and Consultation Book, shows that responses were provided in an adequate and timely manner, i.e. no later than 3 weeks after the letter is received.</p>	
1.1.5		

Unit of certification has a recording of a updated stakeholder list made by the SPO Officer in each area and explains the name of the institution/organization, address, contact number and name of the serving personnel, such as contractors, labor unions, government institutions, villages around the company, etc. The person to be contacted clearly stated in the stakeholder list. From the results of interviews via telephone with stakeholders referring to the list, it can be connected and the information found is valid.

Status: Comply

1.2

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

1.2.1

The company commitment to ethical conduct has been stated on "*Kebijakan Bisnis dan Hak Asasi Manusia Sinarmas Agribusiness and Food*" signed by the Head of Policy and Compliance Division on 12 December 2019. The policy comprises 11 commitments that cover elements such as respect the rights and dignity of workers in accordance with the applicable law/regulations, prevent forced labor and human trafficking, not use child labor, respect local communities or customary rights, respect and protect whistleblowers and human rights defenders, comply with laws related to the prevention of bribery and corruption. Besides, the company also has GAR Social and Environment Policy/GSEP signed by the Head of Upstream on November 2015 explaining the code of integrity and ethical business.

The policy has been socialized to the workers and contractors, seen in the document minutes of socialization with a list of participants such as workers and contractor on 16 March 2022. Based on interview with workers and contractor, it's known that they had a good understanding towards code of ethic policy. Based on explanation above, company has policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.

1.2.2

Code of ethics policy implementation mechanism, among others, is through Internal Audit checks and due diligence in the selection of third-party contractors/suppliers, which states in the agreement that the parties must comply with applicable regulations such as no forced labor and child labor. In addition, the involvement of stakeholders in monitoring in this implementation, SOP for Handling Complaints and Dissatisfaction (No. SOP/SMART/SUST/IV/003 Revision 3.0 dated 8 March 2022).

Based on field observation to estate and mill, it was known that contractor used by company are FFB transporter, civil contractor, testing inspection service, etc. Implementation towards safety and manpower aspect has regularly and evaluate periodically by estate or mill management every month, as presented in Form No. F/SMART/UMUM/SADV/006/002 about evaluation and recommendation of contractor.

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 Best Management Practice Regulation

- The management unit already owns and uses pesticides registered with the Pesticide Commission.
- IPM activities according to the best IPM guidelines.
- Reporting on the Plantation Business Development Report of PT Kresna Duta Agroindo Quarter I of 2022 to the Plantation Agency of Kutai Timur Regency on 13 June 2022.

Compliance with OHS Regulation

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

- The establishment of the P2K3 (OHS Committee) for PT Kresna Duta Agroindo (MWHE) which were registered / approved by the Manpower and Transmigration Agency of Kutai Timur Regency in 01 April 2015 (Decree No. 566/502/P2K3/Was).
- The establishment of the P2K3 (OHS Committee) for PT Kresna Duta Agroindo (GKME) which were registered / approved by the Manpower and Transmigration Agency of Kutai Timur Regency in 25 April 2016 (Decree No. 566/865/P2K3/Was).
- The establishment of the P2K3 (OHS Committee) for PT Kresna Duta Agroindo (MWHM) which were registered / approved by the Manpower and Transmigration Agency of Kutai Timur Regency in 02 April 2015 (Decree No. 566/508/P2K3/Was).
- Provision of PPE for free to all workers and arrange the use of PPE according to the type of work based on the free predetermined HIRAC

- Have permits for all factory operating machines such as boiler and sterilizer machines that have been tested for eligibility according to applicable regulations (the last feasibility test was in January 2022 for boiler carried out by the PT Perda Karya Utama – PJK3).
- Has a license / competency for some special jobs that require more expertise such as OHS experts, hiperkes, boiler operators, diesel engine operators, welder, wheel loader operators and others in accordance with the requirements contained in the legislation.
- Has carried out a general health check (Medical Check Up) every year until 2022 (March) for all workers and special checks (cholinesterase, spirometry and audiometry) according to the level of risk / danger for certain jobs (last checks in 2019).

Manpower Aspect

- Employment Report for GKME (No. 75655.20220405.0001) in 2022 via online on 5 April 2022 and must be reporting back on 5 April 2023.
- Employment Report for MWHM (No. 75555.20220224.0002) in 2022 via online on 24 February 2022 and must be reporting back on 24 February 2023.
- Contract Worker Record No. 560/1632/HIJ as many as 19 workers (security, compound, etc.) on 28 December 2021 in MWHM to Manpower Agency of Kutai Timur Regency.

Legality Aspect

- Company had NIB Document with number 8120412051067 established on 16 October 2018 via OSS system.
- Company had NPWP with number 01.062.143.1-092.000, registered on 27 June 2002.

Environment Aspect:

- Document of Environmental Impact Analysis (AMDAL) which was approved by the Regent of East Kutai through SK No. 080/660.1/BUP-KUTIM/III/2007 dated March 21, 2007
- AMDAL addendum 2007 related to the addition of MWHM processing capacity from 30 tons of FFB/hour to 60 tons of FFB/hour, with approval based on the Decree of the East Kutai Regent No. 622/K.311/2013 dated 22 April 2013.
- Environmental Permit based on the Decree of the Regent of East Kutai No. 622/K.309/2013 dated 22 April 2013.
- Decree of the Regent of East Kutai Number: 660/K.131/2018 concerning changes in environmental management and monitoring, Decree of the Regent of East Kutai Number: 662/K.309/2013.
- Liquid Waste Utilization Permit for Land Application (LA) No. 503/02/DPMPTSP-PPNP/L.A/II/2020 dated February 28, 2020. The permit is valid for 5 years.
- Hazardous Storage MWHE based on the Decree of the Regent of East Kutai No. 660/K.323/2018 dated 18 May 2018.
- Hazardous Storage based on the Decree of the Regent of East Kutai No. 660/K.448/2017 dated June 13, 2017.

2.1.2

The certification unit has SOP to comply with regulations & other requirements (SOP/SMART/UMUM/SADV/II/ 002, dated July 1, 2014). Regulatory updates are carried out at least once a year (Updated on February 2022). The officers responsible for updating the list of regulations according to the SOP are: Identification of regulations at the national level by SADV and at the regional level by Regional SPO Officer and SPO Officer unit. The document describes the company's compliance with the regulations in force in the Republic of Indonesia, for example the fulfilment of the latest regulations such as the Decree of the Governor of Kalimantan Timur regarding the Provincial Minimum Wage for 2022.

2.1.3

The company has a map that showing the location of the boundary poles in each estate. The company has also monitored HGU boundary pole in 2021/2022 by showing the results of monitoring record "*Monitoring Patok HGU GKME & MWHE Tahun 2022*", in accordance with the maintenance procedures (SOP/SMART/CERS-EHSD/SADV/II/004, 1 July 2014). The procedures include stating that the PMNP team ensures and coordinates with the head unit so that the position and number of the stake are in accordance with the Land Use Title / and Building Right map. In addition, it is also stated that the stake monitoring is carried out at least 1 x 4 months. The results of field observations on the boundary pole for example No. KDA010, KDA017, KDA029, KDA030, GPS009 and GPS007 are found and that the condition of the boundary poles is well maintained.

Status: Comply

2.2

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

2.2.1.

The company has maintained a list of contracted party including FFB supplier and contractor for activities such as transporters and operational services. There are 7 contractors and 9 independent FFB suppliers in total has listed in the document of Stakeholder List of PT KDA dated 10 February 2022. Contractor list has been in line with information in stakeholder list. All third party has been listed such as FFB supplier, hazardous waste contractor, machineries maintenance in mill, etc.

2.2.2

In managing contractor, company has copy of collaboration agreement with each contractor. For example, company has shown its agreement which has shown that there were several separate clauses on the work agreement between company and contractor related to fulfilling legal obligations in Indonesia. Some of these obligations are related to registration of workers' health and social security insurance, provision of minimum wages, obligation to use PPE, other permits such as tax payment and others. For example, company has shown agreements between two parties based on Agreement Adendum with number GKME/SP/Mar-21/0020 on 9 March 2022 between PT Kresna Duta Agroindo and PT Maharani Sukses Abadi for gravel procurement which is valid from 29 March 2021-30 April 2022.

The company has also shown health and worker insurance (*BPJS Kesehatan and Ketenagakerjaan*) for 2022 period for PT Maharani Sukses Abadi on *BPJS Ketenagakerjaan* of February 2022 on 7 March 2022. Besides, company shows example of pay slip for contractor's worker and proof of payment for employment and health Insurance and Social Security (BPJS), for example for PT Maharani Sukses Abadi for March 2022, for example, in 25 working days, HSK (initial) get IDR 5,064,000. Based on document verification, this contractor also gives salary to its employee above minimum wage set by government. The company shows contractor evaluation form which was carried out in 2022 on 19 March 2022 which informs several aspects of assessment, including compliance with labor regulations, implementation of OHS and compliance with environmental regulations.

2.2.3

There was a clause on disallowing child, forced and trafficked labour as showed in the Integrity Pact that was signed by the representation of all contracted parties. For the example, Integrity Pact of PT MSA for SPK No. Ref: 010/LoA-SB/III/2021, signed by the Director dated 22 March 2021, stated in clause of point 4 that "Respecting human rights and not discriminating, not using forced and trafficked labour and not using child labor. In this document, it also contains statement related to anti-bribery, anti-corruption, anti-forced and trafficked labor and prohibition of underage worker. Based on document review and field observation, it showed that there were no workers under the age of 18 and the work provided was in accordance with the agreement when the initial worker worked.

Status: Comply

2.3

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

2.3.1

Muara Wahau Mill has recorded the source of its FFB, here are the TBS details received directly by the factory :

NO	NAMA SUPPLIER	ALAMAT	TITIK KOORDINAT	SISTEM SERTIFIKASI	SERTIFIKASI			Management Representative	No Handphone
					RSPO	ISCC	ISPO		
1	Muara Wahau Estate (MWHE)	Desa Miau Baru Kec. Kumbang Kab. KUTIM	01°08'09.81" N 117°00'23.38" E	ISCC/RSPO	√	√	√	Sarjono	082277516354
2	Gunung Kumbang Estate (GKME)	Desa Suka Maju Kec. Kumbang Kab. KUTIM	01°06'09.48" N 117°01'13.12" E	ISCC/RSPO	√	√	√	Andreas	08111888834
3	Gunung Kumbang Plasma (GKMA)	Desa Miau Baru Kec. Kumbang Kab. KUTIM	01°05'57.26710" N 117°00'42.18036" E	Non Sertifikasi	-	-	-	M. Syamsul	08129739531
4	Koperasi Kumbang Bersatu (KKBX)	Jl. Wijaya Kusuma Ds. Marga Mulya	100 % Traceability to Plantation	Non Sertifikasi	-	-	-	Agus Tamam	085246920868
5	BINA SAWIT MANDIRI (KBIX)	JIL CEMPAKA . DS MARGA MULYA KEC. KOMBENG		Non Sertifikasi	-	-	-	Sutikno	085332735390
6	CAHAYA GUNUNG KOMBENG (KCGX)	DESA JAK LUAY KEC. MUARA WAHAU		Non Sertifikasi	-	-	-	Asriani	082230863479
7	PALMA KARYA MANDIRI (KPKX)	JIL. DANAU MENINJAU DS. MAKMUR JAYA KEC. KOMBENG		Non Sertifikasi	-	-	-	Damianus	082158708826
8	PERINTIS JAYA SATU (KPSX)	JIL. MANGGIS DS SUKA MAJU KEC. KOMBENG KUTIM		Non Sertifikasi	-	-	-	M idris	085252923607
9	SETIA SAWIT KUTIM (KSSX)	JIL NUSANTARA RT.001 DS SRI PANTUN KEC. KOMBENG		Non Sertifikasi	-	-	-	Alimuddin	081346696699
10	JASA MUTIARA KOMBENG (JMIX)	JIL. POROS DS. MAKMUR JAYA KOMBENG KUTAI TIMUR		Non Sertifikasi	-	-	√	Ade Akbar	082251166635
11	KOPERASI TUNAS AGRI (KTAX)	JIL. PERJUANGAN 1 RT.01 DESA MIAU BARU KEC. KOMBENG		Non Sertifikasi	-	-	-	Arang Jau	081254676340

The data record is also equipped with supporting information as described in indicator 2.3.2.

2.3.2

From the recorded data on FFB receipts for the 2020/2022 period, it is known that the company received FFB from indirect sources (collectors), for example Palma Karya Mandiri and Perintis Jaya Satu. The company is able to show location and land ownership data for FFB origins that are received by each of these collection agents, here are some examples:

Collector	Smallholder Name	Land Rights	Location	Coordinate Location
Palma Karya Mandiri	Petrus Vasko	SHM	Makmur Jaya Village	1° 07' 23.437" N & 116° 56' 46.610" E
	Damianus Badorasso	SHM	Makmur Jaya Village	1° 07' 10.023" N & 116° 56' 33.613" E
Perintis Jaya Satu	Bahri Bale	SHM	Suka Maju Village	1° 04' 47.5" N & 116° 56' 29.8" E
	M. Cholil	SHM	Suka Maju Village	1° 04' 47.1" N & 116° 56' 29.8" E

Based on document verification, the number of suppliers that have been identified by the company is in accordance with the amount of FFB received by the factory according to each collector.

Status: Comply

PRINCIPLE #3 OPTIMISE PRODUCTIVITY, EFFICIENCY, POSITIVE IMPACTS AND RESILIENCE
3.1

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

3.1.1

The certification unit has shown a long-term plan (5 year plan) for the period 2022 - 2026 for PT Kresna Duta Agroindo. The long-term plan explains maintenance costs, fertilizer costs, harvest costs, transport costs, depreciation, FFB production, OER, KER, CPO production, Kernel production, production prices, CPO prices, and company profits. In addition, the certification unit can show proof of tax payments such as PPH, PBB, and PPN taxes and can show public accountant reports conducted by the Mirawati Sensi Idris public accounting firm, with the report's opinion presenting fairly, in all material respects, the financial position of PT Kresna Duta Agroindo as of 31 December 2021, as well as its financial performance and cash flow for the year ended on that date, in accordance with Indonesian Financial Accounting Standards.

Annual planning also evaluated at the end of year and compared with realization. Its annual planning can be adjusted based on field condition, financial condition or another reason. Estates and mill management unit stated that those long-term plan mentioned above are subjected to be changed and reviewed annually by the respective management such as Mill or Estate Manager (MM or EM) and Vice President Agronomi or Mill (VPA/VPM) through considering actual trends and dynamic situation which predicted could be changed in the future. Furthermore, management unit stated that there was no presence of peat within estate operational areas. Department of Sustainability together with Estate and Mill Management has responsibility to ensure that all technical implementation has in accordance with procedure, which aims to reach optimum output for budget fulfillment purposes through monitoring, training and socialization.

3.1.2

Unit of certification management explained that criteria of replanting could be due to several consideration, such as age of palms (>25 years old), low productivity (<15 ton FFB/ha/year), stand per hectare (SPH) for palm tree is under 100 stand/ha and recommendation from Agronomist or other management consideration. However, based on year of planting data, it was known that palms in PT Kresna Duta Agroindo were planted from 1998 to 2004. Based on the results of the review of replanting documents for the period 2022-2026, it is known that there are plans for replanting activities in 2025 (Replanting activities are planned for palm that were planted in 1998).

3.1.3

The Certification Unit has a procedure associated with operational internal audit in the SOP No. SOP-ISCC/IMT/OIA. The SOP approved by VPA and VPM, entered into force on 1 July 2011. Ensuring consistency of procedures implementation, the companies routinely conduct internal audit activities both agronomic and processing. It is held by the Department of Operational Internal Audit (OIA) every semester. The records of internal audit of 2020 have been documented. Noncompliance records of internal audit has been corrected and verified by management. There is no revision of SOP at the recertification assessment. In each SOP, there is page of document control that record

the revision if any.

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

- OIA Audit Semester 2 2021 dated 02 February 2022 for mill operation (MWHM) conducted by the company's internal parties with the conclusion that there are 4 records, namely the consistency implementation of government regulations in the Kalimantan Timur region that has not been evenly distributed, the achievement of production is still lacking, repair of factory processing machines that are not evenly distributed, and others. This has been discussed by the unit management by making several action plans for improvement, such as increasing compliance monitoring, maximizing the use of admin and others.
- OIA Audit Report dated 02 February 2022 for plantation operations at GKME with the result that there are 2 records in Divisions 3 and 4 related to the harvesting mechanism that is less effective when FFB is in low crop condition. The results of the OIA Audit were immediately reviewed by the management by conducting re-socialization related to an effective harvest mechanism between the harvester and the FFB carrier in order to speed up the transportation of FFB to the mill.
- Management Review Meeting on May 25, 2022 regarding the internal audit of SPO, SMK3, OIA, and customer feedback conducted by the management and the results showed that there were still discrepancies found during the internal audit activities carried out, the production achievement was still outside the standard, grading consistency needs to be maintained and so on. These records must always be evaluated and developed if it leads to a positive direction in the future.

Each unit has documented the operations of the estate and mill production such as daily reports, supervisor workbooks, etc. The field visit at the mill shows that the unit has been documenting the daily activities in a daily production report that documented by using computerized systems.

Status: Comply

3.2

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

3.2.1

The company has a record of implementing continuous improvement. This is a note in the recapitulation and Monitoring Innovation 2022 document which contains, among others:

- Conducted pickup for harvest equipment in the field
- initial delivery of FFB before 10:00
- the use of helmets with Indonesian National Standard specifications for employees
- Stop Block Implementation (Maintain moisture and water in the block)
- Monitoring SPO documents with the GSIS (GAR Sustainability Information System)

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 matched with others document, such as supply chain record, demographic workers, etc.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

Unit of certification have procedures related to oil palm agronomy, oil palm processing and safety aspect, summarized as follows:

- The company has documents of SOP Technical of Oil Palm Cultivation starting from land clearing up to harvesting, approved by SMD Ops and entered into force on 15 July 2020. The SOP documents among others about planning of new area planting, replanting plans, nurseries, land clearing, planting, replanting, pest and disease control, weed control, fertilization, maintenance of immature plant, preparation ahead of harvest, harvesting, loading and transportation of FFB. That SOP's is available on audit site (Estate and Mill office) and written in a language that is easily understandable for workers (written in Bahasa).
- The Oil Mill has SOPs covering all mill operations such as FFB Grading, Sterilization Station, Press Station, Threshing Station, Oil Room, Kernel Plant, Laboratory, CPO & PK Despatch, Engine Room, Boiler Room, Electrical, Workshop as well as Raw and Boiler Water Treatment Plant. That SOP's is available on audit site (Estate and Mill office) and written in a language that is easily understandable for workers (written in Bahasa).
- The entire procedure both of plantation and mill has been included of safe working instruction, other than those described in the

HIRAC document.

Based on procedure documents review, field visit at harvesting Block D15 and process activity in mill, it could be concluded that the oil palm agronomy, processing and safety procedures are still relevant with current situation and covers all main aspects from the field to the mill. All procedures are available in Bahasa. However, estates and mill employees understanding towards technical and safety matters is considered very satisfactory.

3.3.2

The Certification Unit has a procedure associated with operational internal audit in the SOP No. SOP-ISCC/IMT/OIA. The SOP approved by VPA and VPM, entered into force on 1 July 2011. Ensuring consistency of procedures implementation, the companies routinely conduct internal audit activities both agronomic and processing. It is held by the Department of Operational Internal Audit (OIA) every semester. The records of internal audit of 2021 have been documented. Noncompliance records of internal audit has been corrected and verified by management. There is no revision of SOP at the recertification assessment. In each SOP, there is page of document control that record the revision if any.

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Each unit has documented the operations of the estate and mill production such as daily reports, supervisor workbooks, etc. The field visit at the mill shows that the unit has been documenting the daily activities in a daily production report that documented by using computerized systems. Based on the procedure, the certificate holder is known to routinely conduct internal audit every 6 months. Internal audits are conducted by the SMART Internal Auditor to conduct checks related to the operations of a management unit (estate and Mill). The certificate holder shows the results of the internal audit in semester 2 2021 dated 02 February 2022. Internal audit implementation covers several criteria such as: cash bank administration, inventory, plant maintenance, crop production, crop production, wages and personnel.

3.3.3

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

- OIA Audit Semester 2 2021 dated 02 February 2022 for mill operation (MWHM) conducted by the company's internal parties with the conclusion that there are 4 records, namely the consistency implementation of government regulations in the Kalimantan Timur region that has not been evenly distributed, the achievement of production is still lacking, repair of factory processing machines that are not evenly distributed, and others. This has been discussed by the unit management by making several action plans for improvement, such as increasing compliance monitoring, maximizing the use of admin and others.
- OIA Audit Report dated 02 February 2022 for plantation operations at GKME with the result that there are 2 records in Divisions 3 and 4 related to the harvesting mechanism that is less effective when FFB is in low crop condition. The results of the OIA Audit were

immediately reviewed by the management by conducting re-socialization related to an effective harvest mechanism between the harvester and the FFB carrier in order to speed up the transportation of FFB to the mill.

- Management Review Meeting on May 25, 2022 regarding the internal audit of SPO, SMK3, OIA, and customer feedback conducted by the management and the results showed that there were still discrepancies found during the internal audit activities carried out, the production achievement was still outside the standard, grading consistency needs to be maintained and so on. These records must always be evaluated and developed if it leads to a positive direction in the future.

Each unit has documented the operations of the estate and mill production such as daily reports, supervisor workbooks, etc. The field visit at the mill shows that the unit has been documenting the daily activities in a daily production report that documented by using computerized systems. Based on the procedure, the certificate holder is known to routinely conduct internal audit every 6 months. Internal audits are conducted by the SMART Internal Auditor to conduct checks related to the operations of a management unit (estate and Mill). The certificate holder shows the results of the internal audit in semester 2 2021 dated 02 February 2022. Internal audit implementation covers several criteria such as: cash bank administration, inventory, plant maintenance, crop production, crop production, wages and personnel.

Status: Comply

3.4

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

3.4.1

The certification unit has several documents related to social and environmental impact assessments which are carried out independently and in a participatory manner, involving affected stakeholders. The document covers the pre-construction activities, the operation stage, and the post-operation stage. Some of the documents held by the certification unit include:

Environment Impact Assessment

Until the Recertification Audit, it is known that the scope of PT KDA's certification has not changed, namely the area of oil palm plantations covering an area of 6,882.54 ha and a palm oil processing factory with a processing capacity of 60 tons of FFB/hour for MWHM and 15 tons of FFB/hour for GKMM. . The company's environmental permits and their chronological order are shown in several documents, as follows:

- Document of Environmental Impact Analysis (AMDAL) which was approved by the Regent of Kutai Timur through SK No. 080/660.1/BUP-KUTIM/III/2007 dated March 21, 2007 regarding Approval of Andal, RKL and RPL for the Plantation and Palm Oil Mill Development Project of PT Kresna Duta Agroindo with a factory capacity of 30 tons FFB/hour (MWHM) and 15 tons FFB/ hours (GKMM). The areas covered by the AMDAL study are GKME and MHWE with a total area of 7,850 ha.
- The 2007 AMDAL addendum related to the addition of MWHM processing capacity from 30 tons of FFB/hour to 60 tons of FFB/hour, with approval based on the Decree of the Kutai Timur Regent No. 622/K.311/2013 dated 22 April 2013 regarding Environmental Feasibility Addendum to Oil Palm Plantation activities and Production Capacity Increase from 30 tons FFB/hour to 60 tons FFB/hour by PT KDA in an area of 7,850 ha, located in Kongbeng Indah Village , Makmur Jaya Village, Sukamaju Village, Kongbeng District, Kutai Timur Regency, Kalimantan Timur Province.
- Environmental Permit based on the Decree of the Regent of Kutai Timur No. 622/K.309/2013 dated 22 April 2013 regarding the Environmental Permit for Addendum to Palm Oil Plantation activities and Production Capacity Increase from 30 tons FFB/hour to 60 tons FFB/hour by PT KDA with an area of 7,850 ha in Kongbeng Indah Village, Desa Makmur Jaya, Sukamaju Village, Kongbeng District, Kutai Timur Regency, Kalimantan Timur Province.
- Decree of the Regent of Kutai Timur Number: 660/K.131/2018 concerning changes in environmental management and monitoring, Decree of the Regent of Kutai Timur Number: 662/K.309/2013 concerning environmental permits for an addendum to oil palm plantation activities and an increase in production capacity of 30 tons FFB/Hour to 60 Tons FFB/Hour by PT Kresna Duta Agroindo An area of 7,850 ha in Kongbeng Indah Village, Makmur Jaya Village, Sukamaju Village, Kongbeng District, Kutai Timur Regency, Kalimantan Timur Province.

Based on document verification, it is known that the environmental impact assessment process is carried out independently and has involved affected stakeholders. In addition, the study of environmental documents has covered the entire operational area of the company. The results of consultations with the DLH of Kutai Timur Regency revealed that the environmental documents owned by the company complied with the provisions.

Identification of High Conservation Values (HCV) at PT Kresna Duta Agroindo with a total conservation area of 253.08 ha. HCV assessed by HCV Identification Team PT SMART Tbk Environmental Department's in 2013 consist of protected and endangered species areas,

river riparian, and cemetery. This HCV identification covered all estates/mill operational areas including surrounding landscape and RTE species.

Social Impact Assessment

Study Report on Identification of Social Impacts of Oil Palm Plantation of Kresna Duta Agroindo in 2014 by SIA Team Corporate Social Responsibility Department PT Smart Tbk. Assessing the evaluation of the social impacts caused through the aspects of population, economy, and socio-culture.

The SIA document contains evidence of the participation of affected villagers, as well as internal stakeholders. Participation was carried out through interviews and focus groups involving village and community leaders, traditional leaders, youth leaders, and others. The results of the consultation meetings have been summarized in the SIA report. As part of social impact management, the company has carried out Corporate Social Responsibility (CSR) alignment by considering the results of the AMDAL study and Social Impact Analysis. The results of the social impact study explain the impacts, proposed action plans and targets achieved, among others related to:

- Positive impacts: The quality of public health improves, road access becomes good and passable, helps the community's vision function, helps reduce unemployment in the surrounding area, the company participates in the construction of places of worship.
- Negative impacts: the company's response to the submission of aid proposals that are considered long for approval by the community, the intensity of the company's communication and interaction with the community is lacking, the CSR programs that have been carried out have not been optimal, and the damage to road infrastructure.

The results of stakeholder interviews, for example, to the Village Heads of Miau Baru and Suka Maju, it was found that the social impact of the existence of the company was related to CSR, recruitment of village communities as employees, and access road facilities. These social impacts have been covered in the identification of the SIA.

Based on document review, there are several impacts which has been identified including negative and positive impacts. Based on result of interview with representatives of community, governmental institutions, and internal stakeholders of PT Kresna Duta Agroindo there is no issue which has not been identified in SIA document.

3.4.2

Environmental Impact Assessment (EIA)

Based on the results of document verification, it can be concluded that all management and monitoring parameters requested in environmental documents have been implemented. Certification unit has also evaluated for each significant impact monitoring parameter that is implemented as required in KepmenLH 45 of 2005, which includes an evaluation of trends, evaluation of critical levels, and evaluation of compliance. Based on the results of the evaluation, it is known that all parameters are still appropriate by the related Quality Standards, and there is no indication of contamination.

The implementation of environmental management has been carried out in accordance with all RKL-RPL documents and Environmental Permits owned by the company. The certification unit makes RKL-RPL reports based on attachment of Environmental Permit where the matrix is a compilation of all previously owned. The environmental management and monitoring matrix describes the impact of plantation activities and mill operations, also explains the evaluation of the trend level, critical level evaluation and evaluation of compliance with the results of management and monitoring plan contained in the 2013 AMDAL document that have been carried out on the following aspects;

- Decreased air quality
- Noise enhancement
- Decline in surface water quality
- Smell enhancement
- Increasing people's income
- Socialization cohesion and changing public perception
- Improvement of human resources
- Improvement of public facilities
- Changes in disease patterns.

In addition, there is an environmental management and monitoring plan based on environmental permits in 2018, including:

- Decline in surface water quality
- Land fires

The environmental management report is carried out every 6 months and submitted to the relevant agency, for example can be proof with;

- Proof of receipt of the Report on Implementation of Environmental Management and Monitoring (RKL/RPL) and Liquid Waste Management from PT KDA's Plantation and Factory-Unit Plantations and Mills at Gunung Kombeng and Muara Wahau for Semester I year 2021 No Letter. 02/EHSD-JLYE/LH-GKM/VIII/2021 dated 02 September 2021 to the Environmental Service of Kutai Timur Regency and the Environmental Service of Kalimantan Timur Province.
- Proof of receipt of the Report on the Implementation of Environmental Management and Monitoring (RKL/RPL) and Liquid Waste Management of PT KDA Plantation and Plantation Units and Gunung Kombeng and Muara Wahau Plantations for Semester II year 2021 No Letter. 02/EHSD-JLYE/LH-GKM/VIII/2021 dated February 21, 2022 to the Environmental Service of Kutai Timur Regency and the Environmental Service of Kalimantan Timur Province.

Social Impact Assessment

Review report on the management and monitoring plan of the social impact of oil palm plantations of PT Kresna Duta Agroindo (Gunung Kombeng Mill, Muara Wahau Mill, Rantau Panjang Mill, Gunung Kombeng Estate, Muara Wahau Estate, Gunung Kombeng Plasma, Gunung Kombeng Plasma, Gunung Kombeng Plasma Swadaya, Rantau Panjang Estate, and Rantau Panjang Plasma) for the 2021-2022 period. This study involved stakeholders related to the social impacts caused by PT KDA's activities, namely, Desa Sukamaju Village, Miao Baru Village, Makmur Jaya Village, Kongbeng Districts, trade unions, and employee representatives.

In the 2021-2022 period, Unit Certification has managed social impacts on two potential negative impacts identified from the results of the previous review. Three potential negative impacts that are managed include:

Social Impact Management and monitoring:

- Damage to road infrastructure (Marga Mulia, Sri Pantun, and Makmur Jaya Village)
 - Making plans for the maintenance of estate roads and surrounding villages
 - The company participates in road repair and maintenance together with the community
 - Improved communication with the community regarding the availability of heavy equipment and road repair programs during the rainy season where the potential for damaged roads is high
- Community concerns with CPO vehicles that stop by (Makmur Jaya Village)
 - Conducting socialization to CPO drivers so that they send CPO directly and don't stop around the village
 - Make a warning so that CPO is sent directly to bulking
- Inactive employee cooperatives in the estate, regarding opportunities for improvement in previous assessments, these have been identified in the management plan and monitor SIA regarding plantation and mill employee cooperatives that are no longer active.
 - Provide socialization/understanding to employees regarding the conditions of employee cooperatives

Based on the information above, it can be concluded that the company already has the relevant documents assessment of social and environmental impacts and their management and monitoring plans by involving the participation of affected stakeholders.

The participant for SIA adequate compare their operational activities because already covered representatives from; affected parties, community leaders, and village representatives as well as internal company employees. Includes; Gender Committee, Union Representatives, residents in the employee housing area, and villages around the plantations and mills.

3.4.3

Environmental Impact Assessment

The company has documents, the implementation of the results of the environmental permit including reports to agencies in the form of RKL-RPL documents which are conducted every semester and reported to related agency (explain in indicator 3.4.2). The effectiveness of environmental management and monitoring can be seen from the results of environmental management and monitoring analysis, which can also be seen from the suitability between the management and monitoring plans and their implementation in the field. The RKL-RPL document also shows that the company has managed all the critical impacts recommended in Environmental permits. Include impact analysis by trend evaluation, critical level evaluation and compliance evaluation.

From field observation found that environmental management in accordance with the RKL-RPL by installing signboard for conservation areas, marking in the form of stakes, and red paint marks for spray-boundary areas and other chemical applications. Based on the results of interviews with sprayer and fertilizer workers, they also stated that they were aware of the prohibition on applying chemicals to the buffer zone marked in red. In addition, they do not apply chemicals when they are close to water bodies such as canals, reservoirs or artificial ponds.

From the documents review related to environmental monitoring in the RKL-RPL document for the semester 2 of 2021, it is known that there are several measurement results that exceed the environmental quality standards. The certification unit has managed each of these parameters. Even though, the unit of certification has made several efforts to maintain its quality.

Social Impact Assessment (SIA)

The company has managed and monitored social impacts in accordance with what has been stated in the Social Impact Monitoring Report year period of 2021-2022. In general, social impact management activities have been carried out with the aim of reducing the identified negative impacts.

Based on SIA monitoring, it is known that the unit of certification has implemented social management programs through the CSR programs that have been implemented in 2021 for social, health, infrastructure, and economic aspect.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1.

The company has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Collective Labor Agreement 2022-2024 written in Bahasa. Based on document verification, chapter 24 in this CLA also states that every termination of employment must be carried out in accordance with the applicable labor laws and regulations. In general, these procedures describe:

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

In addition to being publicly listed in letter of agreement, company has other procedures in the form of Policies, SOPs, Internal Memorandums and others related to recruitment, promotion, retirement, termination of employment and others. These procedures have been documented to all workers and their representatives.

For example, company has also shown temporary worker agreement in estate based on Work Agreement Number 010/GKME/II/2022 dated 13 February 2022 in GKME with SBD (initial) as field worker from 15 February 2022 until 14 February 2023. Each temporary worker agreement has been recorded and registered to Manpower Agency of Kutai Timur Regency. For example, this contract worker (PKWT) has been submitted to Manpower Agency based on contract worker record as many on 13 June 2022 to Manpower Agency of Kutai Timur Regency.

From this explanation it can be concluded that company has procedures for recruitment, selection, employment, promotion, retirement and termination of employment must be documented/available to workers and their representatives.

3.5.2

The company has documented all labor procedures that have been carried out properly, such as recruitment, promotion, performance appraisal, and termination. Employment procedures implemented and records are maintained. For example, Unit of Certification has shown labor procedures that have been implemented and are well documented as shown below:

- Recruitment document in accordance with the recruitment requirements such as employment request form, application letter, statement of police report, identity card (KTP), family identity card (KK), result of written test, result of interview test, and work agreement letter. For example, a worker on behalf of HBB (initial) who started working on 20 June 2022.
- Promotion documents such as management decree for worker's promotion. For example, a worker on behalf of KCG (initial) in MWHM who had a promotion based on worker's appraisal into PT3 from 1 March 2021.
- Termination document such as the management decree of employment's termination on behalf of AOK (initial) in MWHM. Unit of Certification also showed other supporting documents such as the management decree of employment's termination, debt certificate, calculation of termination payments, and proof of its payment in accordance with the applicable laws.

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

Status: Comply

3.6

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

3.6.1

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

Certification unit have document of hazard identification, risk assessment and risk control (HIRAC) which issued on 02 February 2022 for estate and mill. It will be reviewed if any occupational accident happen. The document describes the description/activity, potential hazards, risk assessment and risk control. Based on site observation at boiler and engine room in mill (MWHM), harvesting and spraying activity in estate (MWHE & GKME) it was clearly confirmed that workers had been aware related potential risk and hazards in the work place. Following up on this, the company has been reduce the potential risk by routine socialization about OHS, providing PPE, and OHS signboard are available in workplace.

Interviews with estate workers (harvester and sprayer) and mill workers (mill operators). Based on the results of interviews can be concluded that workers understand the OHS policy and it's recognized that every morning meeting is always affirmed about the importance of safety and the use of PPE in work. For example, mill employees exposed to high noise such as boiler employees and engine rooms who have used a complete hearing protection device according to risk analysis, namely ear muff and ear plug. There are no complaints from employees exposed to high noise exposure. To ensure that all workers are in good health then certification unit do the medical checkup. The results of each employee's health examination have been properly stored. Last general medical checkups conducted in March 2022 and for special checkups has been conducted in 2019. The result of medical test showed that workers were in good health and fit to work.

3.6.2

Realization of the program of work will be monitored through regular meetings Guiding Committee of Occupational Safety & Health (*P2K3*) every month. This work program applies generally to all workers in the workplace. If the plans have been made yet on target then will be evaluated in the regular meetings to assess effectiveness. The following are examples of the realization by the certification unit in 2019 until March 2021 including:

- OHS inspection of PPE compliance of workers and other equipment that has been every month since 2021 until now. For example, the inspections on January-May 2022 were conducted inspection in work locations found that there were all workers whose has been using an appropriate PPE.
- Dissemination of the dangers of drugs/child workers to workers and residents of housing by installing warnings of the dangers of drugs in every employee's housing, office and other areas.
- Identification of areas with potential emergency hazards such as areas prone to fire, explosion, land / water pollution, and workplace accidents and the results of monitoring conducted every month. The last examination was in January until May 2022.
- Inspection of the availability and condition of first aid boxes conducted since January until May 2022 (every month) with the results of all first aid boxes carried by each field foreman, first aid kit in the office and in the warehousing area are still in good condition and available in 21 types of items in accordance with applicable laws and regulations. If there is item that had not available, the first aid officer will immediately add new item.
- Unit certification always holds routine *P2K3* meetings every month to monitor and evaluate the implementation of OHS that has been carried out. The last *P2K3* Meeting in 13 May 2022 on which discussed the evaluation of the annual evaluation of OSH implementation, preparation of inspection, and others attended by *P2K3* officers.
- Based on interview & Observed with pesticide applicator in Estate and process operators at Mill, certification unit has been provide adequate and appropriate protective equipment available to all workers at the place of work to cover all potentially hazardous operations. For example, Sterilizer and Boiler Operators that has been provide PPE such as safety shoes, helmet, ear plug, & gloves.
- The certification unit has carried out the socialization of Safety induction on 16 March 2022 to all workers in the plantation and mill units. In addition, there are also warnings related to safety induction in several locations of offices, mills, housing and also oral delivery during muster morning to all workers every day. Guests and outside parties (including auditors) who will visit each operational area

at PT Kresna Duta Agroindo, will be given a safety briefing and given PPE before making a visit.

- Identify and monitor the needs of workers who need special competence / expertise to operate heavy equipment or machines in the plantation or mill unit. Monitoring in 2021 it is known that there are 1 workers with special competencies that the companies doesn't have and in 2022 have has been programmed to participate in training in semester 2.

Based on the results of the document review, it is known that the certification unit has carried out routine annual OHS evaluations in each unit by carrying out RSPO internal audit activities in 2020 and 2021, the result is that there are several records related to the implementation carried out in these years but in less than a months have completed those records.

Based on the results of interviews with workers (harvester, pesticide applicator, and process operator) at GKME, MWHE, and MWHM, it is known that every day when the morning muster is carried out, the supervisor will check the completeness of the PPE of the workers and will deliver a safety briefing. Meanwhile, every month an OHS inspection is held to see how it applies to all units. Based on the explanation above, it can be concluded that the certification unit has monitored the effectiveness of the OHS plan to handle OHS risk in people.

Status: Comply

3.7

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

3.7.1

The company has shown results of training identification and program for 2021-2022 on 3 January 2022 in order to improve the competence and expertise of all workers including contractors. Unit of Certification had identified the needs of competence standard and the proposed training for each worker (including contract workers). The needs of competence standard and the proposed training for each worker (including contract workers) which is shown by Unit of Certification, for example:

- Training certification including RSPO, ISPO, ISCC and GHG Calculation
- Training of environmental aspects including environmental aspect, hazardous and toxic waste management, pesticide handling, waste management and energy saving.
- Training of OHS including first aid, fire extinguisher usage, and OHS.
- Training of social of impact assessment
- Training of Agronomy including LSU & SSU, spray & manuring, and pest control.

3.7.2

The company also showed that they had properly documented every training activity and socialization that had been carried out to all workers, contractors, smallholders, and related stakeholders. Company has also shown training/socialization documentation that had been carried out. For example, company has done emergency response simulation and first aid for mill workers on 24 Mei 2021, and first aid training for first aid officer on 17-18 March 2022.

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

3.7.3

UoC showed that they had properly documented every training activity and socialization that had been carried out to all workers, contractors, and related stakeholders. The training of SCCS had been conducted on 25 May 2022 for weighbridge operator, laboratory, and admin. Based on the interview with all workers involved in supply chain operations, such as security (for FFB receiving verification), weighbridge operator, and the PIC related to supply chain, they have been understood the supply chain mechanism, and the IP record has conducted and monitored quite well.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1; 3.8.2

Muara Wahau Mill was used RSPO supply chain of Mass Balance module because mill still received FFB from the outgrowers and collectors which has not been certified with RSPO.

3.8.3

Estimates of CPO and PK produced by Muara Wahau Mill obtained from the projection based on actual data of 12 months before audit activities, here's the detail:

	Last Year Projected Certified Volume (MT)	Actual production in last 12 months (MT)	Estimation for the next 12 months
FFB Processed	155,500	115,201	119,000
CPO Production	34,202	24,246	24,990
Palm Kernel (PK) Production	8,995	6,398	6,545

3.8.4

The Mill have been registered in RSPO Palm Trace as Muara Wahau Mill – PT Kresna Duta Agroindo with License ID CB124002, and Member ID RSPO_PO1000001765.

Whole transaction of CSPO/CSPK has been declared in RSPO IT Platform. Related to CSPK transaction, auditee informs that there's CSPK sold as physical as amount as 4,537.24 MT and there's no CSPO sold as physical or credit.

The auditors verify related to transactions on the Palmtrace platform with actual sales of certified products, for example in 19 January 2022, where there was a sale of 14.50 ton of CSPK to PT Sumber Indah Perkasa, and this was in accordance with the transactions made at RSPO Palmtrace.

3.8.5

Muara Wahau Mill had procedure for SCCS with MB or IP model in SOP of FFB Processing (No. SOP/SMART/MCMD/I/TM-PKS), SOP of Reporting of Certified Product (No. SOP/SMART/CERS-EHSD/SADV/003), and SOP of Document and Record Controlling (No. SOP/SMART/UMUM/SADV/I/001). The company's procedures have been revised in accordance with the latest RSPO SCCS system reference (Revised 01 February 2020).

Auditors conduct interviews with workers who are responsible for the delivery of certified products, namely weighing operators. Operators are able to explain the technical acceptance of certified FFB, sales of CPO/PK and also the reporting mechanism if there is an error in recording information.

3.8.6

The Procedure to conduct annual internal audit are describe in SOP for internal audit No. SOP/SMART/UMUM/SADV/I/009 issued on 1 July 2014 covering all audit for sustainable palm oil including SCCS. In the SOP mentioned that internal audit is done annually. Internal audit of SCCS conforms to the requirements in the RSPO SCCS and the RSPO market communications and claims documents and effectively implements and maintains the standard requirements. Internal audit was held on 23 – 25 February 2022 for all business unit (Estate and Mill) and there is no non-conformity related to supply chain indicators.

3.8.7

Muara Wahau Mill only received FFB from certified and uncertified sources, here's the detail:

Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
May-21	11,940.29	6,552.59	18,492.88
Jun-21	11,846.70	5,874.83	17,721.53
Jul-21	9,230.31	4,910.27	14,140.58
Aug-21	10,459.41	6,477.96	16,937.37
Sep-21	11,903.38	6,075.58	17,978.96
Oct-21	10,885.45	5,895.80	16,781.25
Nov-21	10,899.41	5,310.62	16,210.03

Dec-21	11,010.93	4,722.71	15,733.64
Jan-22	8,673.41	5,976.50	14,649.91
Feb-22	7,370.30	8,015.77	15,386.07
Mar-22	7,878.22	10,462.34	18,340.56
Apr-22	7,535.05	13,807.31	21,342.36
May-22	7,509.25	10,748.90	18,258.15
Total	127,142.11	94,831.18	221,973.29

The auditor has verified FFB received records for the license period, the total FFB certified received was 127,142 MT.

Based on field observations as well as documentation, the management explained that for FFB noncertified from communities has been separated in a system. This has also been confirmed based on the explanations of the FFB carrier employees and also the weighing operator at the factory.

3.8.8

The company shows documentation of certified products, such as sales contracts, shipping announcements, delivery orders, etc. These documents explain the name and contact person of the buyer and seller, date of delivery, product description, quality, quantity, member ID, certificate number, RSPO modules type, unique ID and others. Here's the sample: ID Transaction: TR-0f4f663c-f786, seller PT KDA MWHM, Seller Ref: 1154/KER/1154/21/T034. Buyer PT SIP, Buyer Ref: 4800061837, Product CSPK, Model MB. Volume 304.04 Ton dated 21 January 2022. The document is also equipped with a weighing card, driver's identity and vehicle number for each transportation trip.

Based on document review and interview with management representative, the company only sold CSPK physically.

3.8.9, 3.8.10, 3.8.11

The physically handling of product are conducted by mill itself since FFB receive in grading station and processed to CPO and PK, except the transportation of product and storage tank at bulking are sourced to third party, which bonded by the agreement. The company has a list of contractors for transporting oil palm products from Muara Wahau Mill which informs the name of the contractor, owner, address, work agreement number and validity period. There are contractors / transporters at Muara Wahau Mill, in the name of PT Satrindo Jaya Agropalma (CPO and PK Transporters) with contract number No. 006/KDA/JKTO-III/XII/2019-ATBS, valid thru 31 December 2024.

The contractors and certified holder also agreement related to transparency of contractor operational mechanism, so the certification bodies can audit the contractors.

From the verified data, it is known that there are no changes or additions related to collaborating parties (contractor) related to the transportation and delivery of certified products.

3.8.12

Muara Wahau Mill has record of all CSPO and CSPK information, as well as presented in the table bellows:

Crude Palm Oil

Period	CPO Production (MT)		CPO Delivery (MT)			Stock
	Certified	Uncertified	Certified (Physical)	Other Scheme	Conventional	
Stock Opening						470.60
Jun-21	2,533.97	1,240.00	-	2,612.96	1,339.73	291.88
Jul-21	2,111.75	1,109.80	-	2,053.93	1,128.00	331.50
Aug-21	2,269.33	1,403.33	-	2,353.83	1,412.68	237.65
Sep-21	2,598.61	1,329.84	-	2,542.22	1,397.85	226.03

Oct-21	2,325.99	1,190.77	-	2,269.55	1,215.25	257.98
Nov-21	2,260.14	1,107.03	-	2,312.48	975.56	337.11
Dec-21	2,215.97	902.92	-	2,169.11	871.04	415.85
Jan-22	1,756.38	1,258.98	-	1,882.99	1,215.08	333.14
Feb-22	1,592.24	1,575.25	-	1,570.70	1,593.88	336.05
Mar-22	1,641.52	2,233.84	-	1,593.34	1,924.97	693.09
Apr-22	1,528.52	2,722.90	-	1,504.71	2,624.77	815.04
May-22	1,412.48	2,078.59	-	1,054.16	1,108.04	2,143.91
Total	24,246.89	18,153.25	-	23,919.98	16,806.85	

Based on record verification, there's no CSPO sold as certified product on license period.

Palm Kernel

Period	PK Production (MT)		PK Delivery (MT)			Stock
	Certified	Uncertified	Certified (Physical)	Other Scheme	Conventional	
Stock Opening						337.35
Jun-21	722.66	377.55	713.13	-	401.26	323.17
Jul-21	491.08	259.37	508.12	-	291.47	274.03
Aug-21	542.77	342.57	529.41	-	271.77	358.19
Sep-21	645.23	332.44	723.78	-	438.89	173.18
Oct-21	597.45	313.20	555.71	-	117.42	410.70
Nov-21	635.32	307.49	567.07	-	423.56	362.88
Dec-21	630.65	265.57	654.77	-	298.13	306.20
Jan-22	450.19	324.00	530.58	-	308.70	241.11
Feb-22	413.40	413.83	325.14	-	298.92	444.29
Mar-22	439.09	607.48	482.37	-	520.74	487.75
Apr-22	415.89	754.13	483.34	-	602.07	572.36
May-22	415.09	596.58	388.21	-	766.21	429.61
Total	6,398.82	4,894.20	6,461.63	-	4,739.14	

Based on record verification, there's CSPO sold as certified product on license period as amount as 6,461.63 MT.

3.8.13; 3.8.14 & 3.8.15

The mill has been defined the extraction rate dividing CPO or PK production by the total FFB process. Based on that explanation, extraction rate calculated by industry average. The implementation based on company procedures (MCMD clause II). The sounding process for quantity product calculation done by head of administration (KTU) every morning.

3.8.16

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

- Member Name: Muara Wahau Mill – PT Kresna Duta Agroindo
- Membership No.: 1-0096-11-000-00 (Golden Agri-Resources Ltd)
- Member ID: RSPO_PO1000001765
- License ID: CB124002

Whole transaction of CSPO/CSPK has been declared in RSPO IT Platform. Related to CSPK transaction, auditee informs that there's

CSPK sold as physical as amount as 4,537.24 MT and there's no CSPO sold as physical or credit.

From shipping announcement verification, known that shipping announcement carried out not more than 3 months after dispatch. For example in 19 January 2022, where there was a sale of 14.50 ton of CSPK to PT Sumber Indah Perkasa, and this was in accordance with the transactions made at RSPO Palmtrace.

3.8.17

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

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

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

Unit of Certification has already Sinarmas Agri Business and Food Human Rights and Business Policy which was passed on 12 December 2019 by Head of Policy Compliance Division. In this document, Golden Agri Resource (GAR) commitment to respect human rights (HAM) in all lines of operations is manifested in GAR's Social and Environmental Policy. In implementing human rights policies and running a responsible business GAR is committed to:

- Respect workers' rights and dignity in accordance with legal provisions, treat them fairly without discrimination and build harmonious industrial relations
- Respect workers' rights in terms of freedom of opinion, collective bargaining, and forming and joining trade unions / labor unions
- Prevent forced labor practices and do not use workers resulting from human trafficking
- Ensure that child labor is not employed in all lines of operation
- Ensuring the safety of the work environment and company operations
- Recognizing the equal rights and participation of women around the operating unit
- Creating a working area that is safe and healthy and provides environmental protection
- Respect the rights of local and customary communities in which the company operates
- Respect and protect the rights of whistle-blowers and human rights defenders
- Comply with legal provisions regarding the prevention of bribery and corruption
- Take steps to recover and resolve negative impacts if there are human rights violations through a transparent and legal process

This policy is routinely communicated to all levels of the workforce, operations, supply chain and local communities. For example, company has shown evidence of socialization on 16 March 2022 which was attended by all employees. Based on complaint record review and interview with gender committee, labor unions and manpower agency, it could be concluded that relationship between company, its employee and external stakeholder was considered in conducive situation. There was no violation case of human rights contributed by company.

4.1.2

Based on the interviews with surrounding communities and workers, it showed that up until this assessment, if there was no any conflicts or disputes with company. Resolution action taken was deliberation without involving any violence's or mercenaries. Resolution of conflicts/problems using these deliberations has been quite effective and during past year there have never been any conflicts/problems in operational area.

Status: Comply

4.2

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

4.2.1

Unit of Certification has mechanisms and complaint handling system that is described in SOP for Handling Complaints and dissatisfaction with No. SOP/SMART/GIMS-SCMD/USDV/I/001 dated July 1, 2014 with the latest revision on April 11, 2017 and mechanisms of grievance

handling system that is described in SOP No. SOP/SMART/SUST/IV/003 Revision 3.0 dated 8 March 2022. This procedure describes information related to submission and record of complaints and grievances, rating of complaints and grievances, formulation and approval of complaints and grievances, management plan handling complaints and conflict, and document storage. These procedures have also stated that there is protection for whistle-blowers and there is process for complaints to be brought to the RSPO Complaints System where a resolution is not found mutually. GAR Social & Environmental Policy (GSEP) been socialized to internal and external stakeholders. company also showed record of socialization for internal and external stakeholders. For example, company has shown evidence of socialization on 16 March 2022 which was attended by all employees.

Based on result of interviews with workers in MWHM, MWHE and GKME, surrounding communities, and contractors, it revealed that they had good understanding of communication procedures and personnel who served as communicators between Unit of Certification and community so that illiterate people can be informed by related communicators. In addition, during past year, there were no complaints or disputes that occurred between company and surrounding communities

4.2.2

The company has a complaint handling mechanism and system described in Complaints Handling Procedure SOP No. SOP/SMART/SUST/IV/003 Revision 3.0 dated 8 March 2022. This procedure explains that complaints which was collected by SPO Assistant/Grievance Handling can be submitted either directly via complaint and conflict letter or indirectly via suggestion box, telephone or text message, public media, certification body, NGO, or Head Office. Any complaint or conflict submitted is anonymity guaranteed by company. Handling of complaints and conflicts that have been verified by unit is carried out as soon as possible or according to time agreed with reporting party. If verification towards complaint and conflict has been more than 14 days since reporting party submitted its complaint/conflict, Estate Manager/Mill manager is allowed to give early announcement letter as complaint/conflict response.

To ensure the procedure understood by affected stakeholders, company has conducted annual socialization of the procedure of communication and complaint handling to relevant stakeholders (village officials, community leaders, contractors and others). However, illiterate people can submit their complaints through SPO Assistant or another representative from the stakeholder and also recorded in the grievance logbook. Based on interviews with government agencies, surrounding communities, and workers, it is known that they have understood the person responsible and the grievance mechanism in which complainant's identity is protected.

4.2.3

The company has shown grievance logbook of internal and external stakeholder. Based on document review of grievance logbook in 2021-2022, it is known that there is no grievance to company from internal and external stakeholder in each estate and mill in 2021-2022. Based on interview with workers, it also showed that company has responded if there is any complaint directly after complaints submitted. Besides, based on the interviews with government agencies, surrounding communities, gender committees, and labor unions, it's known that there were no further complaints towards Unit of Certification in 2022.

4.2.4

The company has a complaint handling mechanism and system described in Complaints Handling Procedure SOP No. SOP/SMART/SUST/IV/003 Revision 3.0 dated 8 March 2022. This procedure explains that complaints which was collected by SPO Assistant/Grievance Handling can be submitted either directly via complaint and conflict letter or indirectly via suggestion box, telephone or text message, public media, certification body, NGO, or Head Office. Any complaint or conflict submitted is anonymity guaranteed by company. Handling of complaints and conflicts that have been verified by unit is carried out as soon as possible or according to time agreed with reporting party. If verification towards complaint and conflict has been more than 14 days since reporting party submitted its complaint/conflict, Estate Manager/Mill manager is allowed to give early announcement letter as complaint/conflict response. Other than that, the mechanisms of complaints and grievances of workers described in Chapter XXII of CLA Article 3. In the event of employee complaints of employment, worker may submit the matter to the Labor Union to discuss with the company; if it cannot be resolved, settlement efforts are channeled through the procedure of Law No. 2 in 2004 regarding to industrial relation dispute settlement.

To ensure that the procedure can be understood by employees and surrounding community who cannot read and write, company has conducted socialization directly to employee and surrounding community. For example, company has shown evidence of socialization on 16 March 2022 which was attended by all employees.

Status: Comply

4.3

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

Contributions to community development based on the results of consultations with local communities can be demonstrated by meetings between community representatives and the company in 2021 as the basis for CSR plans for 2022.

The company shows records of CSR activities (period 2021) that have been carried out to the surrounding community as a form of support for improving welfare, here's the detail:

- Education sector: 6 program activities with a cost of Rp. 559,308,000.
- Health sector: 12 program activities with a cost of Rp. 358,8110,000
- Economic sector: 10 program activities with a cost of Rp. 2,310,399,751
- Infrastructure sector: 5 program activities with a cost of Rp. 389,038,000
- Social sector: 12 program activities with a cost of Rp. 190,250,000
- Environmental sector: Rp. 55,725,000

Based on the results of interviews with the Village Heads of Miao Baru and Suka Maju, the existence of the company has a positive impact on the surrounding community. The village also acknowledged that the company provided a lot of assistance to local residents.

One of the development contributions to the community is carried out by local purchases to shops around the company, cooperation with local contractors in plantation and factory management activities and the implementation of CSR activities which are arranged annually in the context of the welfare of the surrounding village communities.

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 company has land rights in the form of HGU and HGB in accordance with Government Regulation no. 40 of 1996 with a total area of **6,877.54** Ha. The land rights consist of:

1. HGU decree from the Head of BPN RI No. 34/HGU/BPN RI/2010 dated June 1, 2010 covering an area of 6,873.44 Ha, valid for 35 years. This HGU SK is redefined in the following HGU certificates:
 - HGU Certificate No. 112 for an area of 6,026.25 Ha which is valid until July 16, 2045.
 - HGU Certificate No. 113 for an area of 847.19 Ha which is valid until July 16, 2045.
2. HGB decree from BPN of Kalimantan Timur Province No. 72-550.2-44-2004 dated March 31, 2004 covering an area of 40,953 M2, valid for 20 years. HGB Certificate No. 01 April 14, 2004 is valid until April 15, 2024. (Muara Wahau Mill)

The company already has a plantation business license in accordance with Law No.18 of 2004 and Ministry of Agriculture 98 of 2013 for an area of 7,850 Ha and a production capacity of 60 tons of FFB/hour (Muara Wahau Mill). Here's the detail:

- Approval of the Regent of Kutai Timur No. 500/018/Ek-I/2006 dated January 18, 2006 regarding the Plantation Business Permit Approval of PT Kresna Duta Agroindo in Kongbeng District for an oil palm plantation of 7,850 ha.
- Decree of the Regent of Kutai Timur No: 188.4.45/158/Eko.I-X/2012 dated 30 October 2012 regarding the amendment to the decision of the Kutai Timur Regent No: 500/018/Ek-I/2006 dated 18 January 2006 regarding the approval of plantation business permits (IUP). PT Kresna Duta Agroindo for the purpose of oil palm plantations covering an area of \pm 7,061 Ha which is located in Kongbeng District, Kutai Timur Regency.
- Decree of the Regent of Kutai Timur Number 188.4.45/065/Eko.1 – V/2014 dated 19 May 2014 regarding the Plantation Processing Business Permit (IUP-P) of PT Kresna Duta Agroindo PKS with a Capacity of 60 Tons FFB/Hour.

The average actual processing capacity for the past one-year period is still below the stipulated permit, which is below 60 tons/hour (57.7 ton/hour).

4.4.2

Based on latest assessment, no additions are made to the company's operations. The company has a record of compensation for compensation for cultivating communities which was completed in 1997. Following are the details of the recapitulation of compensation documents:

No	Name	Width (Ha)	Address
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			(Village)
1	Fransiskus	0,975	Makmur Jaya
2	Dominikus Depo	1,255	Makmur Jaya
3	Yanto	0,792	Makmur Jaya
4	Yoakim Dewa	0,697	Makmur Jaya
5	Endang	0,321	Makmur Jaya
6	Ibrahim	0,842	Makmur Jaya
7	Sebastianus	0,398	Makmur Jaya
8	Tolo Tome	2,404	Makmur Jaya
9	Dominikus Domi	0,340	Makmur Jaya
10	Minto	1,748	Sukamaju
11	Kayat	1,005	Sukamaju
12	Nur Wahit	1,430	Sukamaju
13	Abidin	0,860	Sukamaju
14	Purwanto 1	1,090	Sukamaju
15	Abdul Majid	1,733	Makmur Jaya
16	Eko	0,905	Sukamaju
17	Sukir	1,603	Sukamaju
18	Suryono	1,214	Sukamaju
19	Purwanto 2	0,431	Sukamaju
20	Abdurahman	1,099	Sukamaju
21	Wihelmus	1,985	Sukamaju
22	Atmojo	1,132	Sukamaju
23	Bibit	2,346	Sukamaju
24	Karto	1,783	Sukamaju
Total		28,388	

All documents for compensation and business capital assistance have been properly recorded and stored by the company and are available at the Banjarmasin Representative Office.

4.4.3

The CH has had SOP related land identification and compensation (No. SOP/NP/SMART/VII/D&L002, dated 01 July 2010) which set land identification, calculation and compensation for land acquisition mechanism. In this procedure was explained that the process of land identification is involved the community and the village government.

Based on document review, known that previous land acquisition did not diminish community's legal rights. Based on land acquisition documents, known that the documents made in Indonesia language, has include the maps, price agreement, evidence of payment, and signed by both party as well as Village Officials. The latest land compensation has been conducted in 1997. Based on management interviews, it is known that the CH has no plans to expand the land by legal compensation for community.

4.4.4; 4.4.5; 4.4.6

Based on latest assessment, there was no increase in the company's operational area. The last land compensation process was carried out in 1997. During the release of land, in general, the owner of the land acts as a representative for himself. Regular reviews of the FPIC process are embodied in the SIA document which functions to highlight the social issues of the affected people including land issues. All records were made in Indonesian, clear proof of payment and signed by both parties between the company and the land seller (local community) without coercion.

Status: Comply

4.5

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

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

Until latest assessment was implemented there was no expansion of the area or new planting. This was evidenced by the results of public

consultations with the community and the absence of additional *GRTT* records since 1997. The certification unit can show land compensation documents which include informing about news, measurement program, master map of the compensation area, certificate of ownership, statement of relinquishment of land rights, map of the area to be compensated, receipts for compensation payments. The documents for the compensation process have been signed by both parties and are known to local officials such as the village head, sub-district head and witnesses. Existing and well-documented agreements are one that the FPIC process has implemented.

Based on the results of interviews with representatives of surrounding Villages (Village Heads of Miao Baru and Suka Maju), there are no issues of dispute or other land issues with the company.

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 certification unit shows the Technical Guidelines for Land Preparation: Land / Land Compensation Document Number: SOP / NP / SMART / VII / D & L002 dated 1 July 2010. Procedures include explaining the land identification process, outreach to the community, physical inventory, to the compensation process.

Completeness of compensation payment documents: receipts, documentation, identification cards (*KTP*), minutes of land over and compensation, certificates of land ownership, statement letters, detailed maps of land and attendance lists of land measurements / percel.

4.6.3

Until the latest assessments were carried out there were no new *GRTTs*. The last land acquisition was carried out in 1995. There is FPIC Procedure No. SOP / SMART / SENS-CSR / SADV / I / 003, part 2.4 explains that identification of participatory maps related to legal ownership of the community takes into account gender, community leaders, local or transmigrant communities, ethnic groups, etc.

4.6.4

Until latest assessment was implemented there was no expansion of the area or new planting. This was evidenced by the results of public consultations with the community and the absence of additional *GRTT* records since 1995. The certification unit can show land compensation documents which include informing about news, measurement program, master map of the compensation area, certificate of ownership, statement of relinquishment of land rights, map of the area to be compensated, receipts for compensation payments. The compensation process documents have been signed by both parties and are known to local officials such as the village head, sub-district head and witnesses.

Based on the results of interviews with representatives of surrounding Villages (Village Heads of Miao Baru and Suka Maju), there are no issues of dispute or other land issues with 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

The land compensation process was completed by the company in 1990. There is FPIC Procedure No. SOP / SMART / SENS-CSR / SADV / I / 003, part 2.4 explains that identification of participatory maps related to legal ownership of the community takes into account gender, community leaders, local or transmigrant communities, ethnic groups, etc.

4.7.3

As the results of public consultations with community representatives from surrounding Villages, one of the positive impacts of opening a company is the opening of road access. They stated that prior to the existence of the company, the community's access to interact with other areas was only through rivers. After the company exists, the community can access the company's roads for daily activities.

Heads of surrounding Villages also stated that the company's existence also provided access to recruitment and use of local contractors.

Based on the results of interviews with representatives of surrounding villages (Village Heads of Miao Baru and Suka Maju), there are no

issues of dispute or other land issues with the company.

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

The certification unit has SOP for Social Conflict Handling Document No SOP / SMART / SENS-CSR / SADV / I / 002, dated 1 July 2014. The procedures include explaining the conflict information, conflict analysis, coordination of conflict handling, and preparation of reports on handling progress carried out periodically at least every one month.

Currently, in the company's HGU there are areas occupied by the community. The company admits that the land compensation agreement has not been signed in the area. The company has a recording of the joint agreement between the company and the community on March 21, 2017. In the agreement, several things were stipulated, including:

- The land cultivator knows that the land planted with oil palm in this area is within the HGU area of PT Kresna Duta Agroindo which is located in Block G29.
- PT Kresna Duta Agroindo will not interfere with the cultivation activities for land cultivators.
- PT Kresna Duta Agroindo has an interest in knowing the boundaries of the HGU area by installing a HGU KDA 18 pole located on the land of the cultivators.
- Land cultivators at the location of the HGU stake are willing to place the HGU KDA 18 stake according to its location and will not disturb/damage the stake.

A recording of the agreement is made and signed by both parties. The people who signed on behalf of Kueng Lahang, Sem Luat, Yonathan Djiu, Yansen, Stepanus Lie, Suli, Iba, Leyang Sat, Ardiansyah, and Kasiman. The recording is also accompanied by a participatory area map. The auditor made observations in the occupation area, it was found that the HGU stakes were installed according to the agreement and there were no indications of encroachment or operational disturbances between the parties.

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

Muara Wahau Mill accept FFB from plasma, such as *Koperasi Swadaya Masyarakat Bersama* and *Koperasi Sawit Kandis Sejahtera*.

Based on an interview with the Manager Mill, the pricing is an agreement between the management of supplier and the FFB supplier. Pricing is fluctuated in accordance with the development of FFB prices and CPO prices on the world market.

Based on the results of interviews with the FFB supplier, it is known that the company always communicates to him every day regarding changes in FFB prices. The company also informs the FFB on the notice board at the factory, so that it can be seen by FFB suppliers.

5.1.3

Based on the company's agreement with the cooperative, the determination of the price of FFB purchased refers to the provisions contained in the Regulation of the Minister of Agriculture regarding the Guidelines for Determining the Purchase Price of Fresh Fruit Bunches for Palm Oil Production by Smallholders.

5.1.4 & 5.1.8

The company has no obligation to build community estate (scheme smallholder). However, the company has a community estate partnership whose construction has now been completed. The collaboration is with 7 villages around the company, namely Sidomulyo Village, Makmur Jaya, Kongbeng Indah, Marga Mulia, Wanasari, Sukamaju and Sri Pantun. The plasma plantation area is 2,214 hectares with a total of 1,168 farmers, with details of the planting year as follows:

- Year 2009 planting area of 500 Ha,
- Planted year 2010 covering an area of 1,376 Ha,

- 2011 planting year covering an area of 338 ha

Based on the results of interviews with the management of the Sawit Bersama Cooperative, it was stated that the Gunung Kombeng plasma plantation had an area of 2,214 hectares and was managed by PT Kresna Duta Agroindo.

5.1.5; 5.1.6

Current and previous prices paid for Fresh Fruit Bunches (FFB) are publicly available. The price of FFB determined by the unit of certification in accordance CPO price trends and it's stipulated in work agreements. Based on contract agreement verification known that the FFB trading is conducted fairly, transparently and based on both party agreement. Has been observed, the FFB payment process has been carried out transparently and there has never been a grievance related to the payment. An example of payment verified by the auditor is invoice and proof of payment for period for March 2020 where the calculation of payment is in accordance with the amount of FFB acceptance in Mill and the price set. Furthermore, into the local contractor the company can demonstrate that the payment is in accordance with the agreed agreement.

5.1.7

Companies are encouraged to immediately complete the *Terra Timbang* for MWHM and GKMM which has expired, namely March 14, 2021. The notification letter from PT MUGI can be shown to PT KDA MWHM and GKMM that the *Terra Timbang* cannot be implemented because it is still waiting for the 2022 Stamp/Stamp from Directorate of Metrology Bandung.

5.1.9

The unit of certification shows the SOP for Handling Complaints and Dissatisfaction with No. SOP / SMART / GIMS-SCMD / USDV / I / 001 issued date 1 July 2014 with the last revision 11 April 2017. In the SOP, it is explained that the Social Officer / KTU receives letters of complaint and dissatisfaction directly from the reporter or indirectly through the suggestion box. Information and data entered are recorded in the Complaint and Dissatisfaction Registration Form. Protection of whistle blowers is contained in the document, point 2.2.1 part a, which states that the Company guarantees the anonymity of whistle-blowers and whistle-blowers with the aim of reducing the risk of revenge.

Based on document review of complaint book, there is no complaint from contractor or vendors.

Status: Comply

5.2

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

5.2.1

The Certification Unit has consulted with farmers, both out growers and smallholders. Consultation activities are carried out in conjunction with SIA management and monitoring activities. The results of the monitoring and review of the 2021 SIA management plan show that the needs needed by farmers are price certainty, access to quality official seeds, adequate road access and long-term contracts.

Based on the results of interviews with the Kombeng Bersatu Cooperative, it is known that the Cooperative is currently still in the process of preparing farmers to take part in RSPO certification.

5.2.2

Based on the results of interviews with the Kombeng Bersatu Cooperative it is known that the company has conducted socialization and training related to RSPO, HCV, Best Practice, etc.

5.2.3

The management unit has provided support to farmers to promote the legality of FFB production. As for examples of encouragement made related to ensuring that the source of FFB does not come from looted areas, does not come from forest areas, and already has land legality. The company has also collaborated with local farmers by providing certified superior seeds and receiving FFB from these farmers to ensure that FFB comes from superior seeds.

In addition, based on the results of interviews with the Kombeng Bersatu Cooperative, it is known that currently the legality of farmer members of the cooperative is in the form of SHM and SKT.

5.2.4

Companies can show recordings of training on IPM and the use of pesticides to plasma farmers, for example, recordings of training to the scheme smallholders unit which was held on 2021, which was attended from Suka Maju Village. The training materials include the implementation of a pest census and its control.

5.2.5

The management unit has conducted periodic reviews and made public reporting on the development of support to farmers on a regular basis which is carried out annually for all units under GAR. This can be seen in the GAR sustainability report which can be downloaded on the GAR website.

Status: Comply

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

The company has a policy of non-discrimination and equal opportunities. Policies on equal opportunities and treatment to get the job described in Circular Letter No.096/CEO2-SE/12/2010 on 14 December 2010 towards the implementation in industrial relation. There is explanation related to realize harmonious industrial relations, dynamic and fair company implemented industrial relations of each operational unit without distinction of race, religion, race and gender in all types of field work. Besides, there is Circular Letter No. 268/CEO2/HR PSM 2/10/2015, 1 October 2015 is revision of Circular letter No. 096/CEO2-SE/12/2010, stated that *"in order to realize harmonious industrial relations, dynamic and fair company implemented industrial relations of each operational unit without distinction of race, religion, race, physical condition, gender, sexual orientation, membership of union, political affiliation and age in all types of field work"*. This policy is publicly available, and stakeholder can access it upon request.

Based on worker's recruitment document, company had provided equal opportunities in recruitment and operational activities. In addition, in job vacancies that have been published by the company, there were no requirements that discriminated against gender, race or ethnicity, disability, sexual orientation, age, or belief. Based on result of public consultations with agencies, worker unions, and gender committees stated that there were no cases of discrimination in obtaining employment opportunities. Based on interviews with the gender committee, women workers are given equal rights, wages and opportunities to get promotions with male workers of the same type of work. This is in line with the results of the field visit, as for example, there were loose fruit pick workers who were female and are given equal rights and wages.

6.1.2

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

Based on result of interviews with manpower agency, gender committee, labor unions, and workers MWHM, MWHE, and GKME, it is known that workers have never felt that company has discriminated against them. It was explained that all activities from recruitment, performance appraisal, and promotion were given equal opportunity regardless of ethnicity, caste, nationality, religion, disability, gender, sexual orientation, gender identity, membership in labor unions, politics, or age. There was no difference in communication between supervisors and workers because of the things mentioned above, so the workers did not feel isolated or discriminated against by supervisors. Unit of Certification also didn't request for any payment during the recruitment process.

6.1.3

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

- Recruitment document in accordance with the recruitment requirements such as employment request form, application letter, statement of police report, identity card (KTP), family identity card (KK), result of written test, result of interview test, and work agreement letter. For example, a worker on behalf of HBB (initial) who started working on 20 June 2022.
- Promotion documents such as management decree for worker's promotion. For example, a worker on behalf of KCG (initial) in MWHM

who had a promotion based on worker's appraisal into PT3 from 1 March 2021.

Job opportunities were communicated and given to surrounding villagers at priority where no discrimination found observed during interview and related records of workers being employed. All workers are treated equally in accordance with company regulation including rights of worker as well.

6.1.4

Based on field observation, interviews with the management and workers, it is known that there were no discriminatory in pregnancy testing given by the company. The pregnancy test conducted only to ensure that no pregnant workers in any agrochemical works such as pesticide application and fertilizing activities proven by there was no requirement regarding pregnancy test in recruitment SOP, job hiring announcement, and medical test during recruitment. All pregnant workers placed in non-agrochemical works such as day care keeper, manual upkeep, and loose fruit picker.

Unit of Certification also showed list of pregnant woman and breastfeeding mothers that showed all women placed in non-agrochemical works (manual upkeep, loose fruit picker and office staff).

6.1.5

Gender committees have been formed and are still active today in company which is chaired by committee chairperson along with coordinators in several sections and there are representatives in each unit. Structure of gender committee consists of male and female workers. Main objective of forming gender committee is to provide a forum that can accommodate aspirations/complaints of workers, as Unit of Certification partners in carrying out activities of socialization related to gender and other policies related to workers' reproductive rights. In carrying out its activities this gender committee always collaborates with labor union so that the socialization of matters related to women's rights can be conveyed properly and there is no discrimination in terms of gender. The company informed that they also held socialization about gender committee. For example, company has shown evidence of socialization of gender committee which was held on 16 March 2022. Estates annual Work Programs, includes: socialization; counselling; monitoring; child care facilities monitoring; committee gender meeting; health services post (*Posyandu*). Besides, Gender Committee has also established program in 2022 which is still in accordance with program in 2022 including socialization; counselling; monitoring; child care facilities monitoring; committee gender meeting; health services post (*Posyandu*).

Based on the interviews with workers in MWHM, MWHE and GKME, they also knew of the existence of the gender committee because it had been routinely socialized by management. Besides, workers have known that they can report any complain through Gender Committee in each unit.

6.1.6

The company does not discriminate against workers' rights, this is indicated in the document of Director Decree No. 036/CEO Kalseltim/01/2021, Director Decree No. 037/CEO Kalseltim/01/2021 and Director Decree No. 036/CEO Kalseltim/01/2021, respectively concerning Wage Structure and Scale for Permanent Worker, Last Daily Worker and Temporary Worker/*PKWT* dated 1 January 2021. This document is a provision with regard to wage standards for each level of work. Based on interview with sampled workers and the verified sample of pay list and pay slip documents shown that employees for the same work scope or same level of all genders are being paid equally in accordance with regulations.

Status: Comply

6.2

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

6.2.1

The company had procedures related to regulation reference, company policy, work relationship, leave and permission, salary payment, welfare and insurance, business trip allowance, disciplinary, mutation, work termination, grievance and complaint and others which are generally described in Collective Labor Agreement (CLA) for period of 2022-2024 and was written in Bahasa. This CLA had been registered to Manpower and Transmigration Agency of Kutai Timur Regency with Decree No. B-560/633/DISNAKERTRANS-HIJ/IV/2022 dated 7 April 2022. Collective Labor Agreement (CLA) for period of 2022-2024 explained working conditions and rights/obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, overtime, and other provisions.

Based on the interviews with workers (harvesters, pesticide application workers, and mill operators) and labor union representatives, it

concluded that workers have a sufficient understanding of their rights (wages, overtime, incentives, etc.) listed in the CLA and in accordance with routine socialization provided by company. Workers' wages in 2022 have been above the minimum wage set by local government. Wage based on years of service, ability, attendance and job performance (structure and scale wage) and there were no late payments every month. Based on interviews with workers (harvesters, pesticide application workers, and mill operators), it is also informed that they had received their wage above minimum wage set by local government which is Rp. 3,175,427.

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

There are 2 types of worker status were SKU (permanent worker) and PKWT (contract worker). Pay and condition for all employees were available in working agreement and Collective Labor Agreement (CLA) for period of 2022-2024. SKU and PKWT will receive payment slip in the end of month to acknowledge their income. Beside basic salary, SKU workers get monthly non-fixed aid called "Family Aid" as stated in CLA 2022-2024 Article 6 with details below:

- Workers alone: money or 15 kg of rice
- One legal wife: money or 9 kg of rice
- Children (until 3): money or 7,5 kg of rice

SKU workers conditions based on CLA 2022-2024 that covered working hours, deductions, overtime, sickness, holiday, maternity leave, reasons for dismissal, period of notice etc. Meanwhile, for PKWT workers the conditions stated in their contract. PKWT rights are contained on each agreement. All PKWT rights is same with permanent worker rights, such as: annual leave, rice allowance, social security insurance. Deduction has been ruled in each contract for PKWT and Collective Labor Agreement for SKU workers. Payroll documents give accurate information on compensation for all work performed e.g., wage, net wage, overtime, absence deduction, etc. This regulation in company has been socialized to workers in MWHM, MWHE, and GKME in June 2022.

Company has shown establishment of minimum wage in each unit. For example, company has established minimum wage in 2022 in each unit including MWHM, MWHE, and GKME as shown below:

- Decree of North Sumatera Governor No. 561/K.599/2021 dated 30 November 2021. Minimum wage set in Kutai Timur Regency in 2022 is Rp. 3, 175,427/month.
- Decree No. 036/CEO PSM 3/ 01/2022 dated 1 January 2022 regarding Structure and Wage Scale of SKU (permanent worker) in PT Kresna Duta Agroindo in 2022.

Agreement/contract of employment for workers has been included in the CLA of 2022-2024 which has been endorsed in Letter No. 560/633/DISNAKERTRANS-HIJ/IV/2022 dated 7 April 2022 by Manpower and Transmigration Agency of Kutai Timur Regency. In the agreement regulates the: working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.). CLA only covered SKU workers. Meanwhile, for PKWT workers based on their respective contract. Contract was signed by both parties.

There are sample of PKWT agreement number 010/GKME/II/2022 dated 13 February 2022 in GKME. Work agreement (contract) between contract workers and company describes about scope of agreement, rights and obligations, work days and times, leave, salary, allowance, welfare facilities, sanctions, layoffs, settlement of disputes and others. Contract is written in Indonesian language and workers are understood substance of contract. On the chapter which describes salary system, stated that basic wage for permanent daily worker is above daily minimum wage. All work agreements have been registered to manpower agencies and showed that the pay and conditions in accordance with applicable Law. For example, this contract worker (PKWT) has been submitted to Manpower Agency based on contract worker record as many on 13 June 2022 to Manpower Agency of Kutai Timur Regency.

The company showed overtime payment in April-May 2022 that has been in accordance with applicable laws for workers on behalf of KPL (initial) as process operator. In the pay slip document, it's known that the nominal of the worker's overtime wages has in accordance with the overtime calculation. Result of review of pay slip document for April-May 2022 above, proved that wages received are above minimum wage and in accordance with the wage scale structure determined by the certification unit for 2022.

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

6.2.3

Unit of Certification had procedures related to regulation reference, company policy, work relationship, leave and permission, salary payment, welfare and insurance, business trip allowance, disciplinary, mutation, work termination, grievance and complaint and others which are generally described in Collective Labour Agreement (CLA) for period of 2022-2024 and was written in Bahasa. This CLA had been registered to Manpower and Transmigration Agency of Kutai Timur Regency with Decree No. B-560/633/DISNAKERTRANS-HIJ/IV/2022 dated 7 April 2022. Collective Labor Agreement (CLA) for period of 2022-2024 explained working conditions and rights/obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, overtime, and other provisions.

The company showed overtime payment in April-May 2022 that has been in accordance with applicable laws for workers on behalf of KPL (initial) as process operator. In the pay slip document, it's known that the nominal of the worker's overtime wages has in accordance with the overtime calculation. Result of review of pay slip document for April-May 2022 above, proved that wages received are above minimum wage and in accordance with the wage scale structure determined by company for 2022.

The company has also shown paid leave letter which was shown below:

- Maternity leave was given 3 months of paid leave (1.5 months before give birth and 1.5 months after). For example, paid leave letter on behalf of RWJ (initial) in MWHM approved by the supervisor on 2 June 2022
- Regular employee paid leave on behalf of SAA (initial) in MWHM on 12 April 2022 for 2 days and was approved by Mill Manager on 12 April 2022.

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

6.2.4

Unit of Certification has provided housing facilities on each estate and mill. For example, list of facilities in 2022 including houses, mosque, church, workers hall, football field, volley ball field, badminton field and school bus. Based on field observation to housing complex of MWHM, MWHE, and GKME, it was known that all housing on good condition and livable, there were domestic waste sanitation, and adequate clean water facilities. Therefore, based on interview with workers revealed that if any housing facilities were damaged, they had to report to the supervisor.

6.2.5

There is traditional market are near from housing complex of company which can be accessed by workers within thirty minutes. Moreover, there is temporary market comes from surrounding communities at the time of wage payment. In addition, traders who are allowed to sell in a residential area make it easier for workers to access food sources. This matter has been verified through consultation with labor union as well as housing residents.

Based on interviews with estate and mill workers, labor unions and gender committees, it's known that workers have no difficulty in getting food sources because the company has provided cooperatives that sell daily necessities. In addition, workers can buy these needs to the markets around the company's area without any difficulties.

6.2.6.

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

The company has the determination of assessment prevailing wage and all kinds of benefit for DLW simulation in 2022 has been included in the calculation of housing facility cost, water cost, educational cost, and health cost. Standard of wage eligibility referred to by the unit of certification is minimum wage. A detailed explanation of minimum wage is provided in indicator 6.2.1. Based on document verification, DLW calculation has done based on actual and rational price at certification unit location. The components included in the calculation of a living wage include the following:

- Contract and PT4A workers

Minimum Wage: IDR 3,175,427

Eid allowance: IDR 264,619
 School: IDR 220,883
 Health outside BPJS Kes: IDR 120,104
 Day-care: IDR 89,790
 - Workers with group> 4A
 For example: PT4B group
 Wage: IDR 3,007,235
 Eid allowance: IDR 264,619
 Rice: IDR 390,000
 Electricity: IDR 10,269
 House: IDR 417,501
 Water: IDR 16,425
 School: IDR 220,883
 Health outside BPJS Kes: IDR 120,104
 Day-care: IDR 89,790

6.2.7

Based on the verified document of verified Employee List, the status of workers consists of permanent employees and PKWT. The PKWT is gradually will be upgraded to be Permanent Worker (Pekerja Tetap), as seen in the document of Memo No: 002/VPA3-INT/BNJO/06/2022 dated 13 June 2022 concerning appointment of 23 PKWT to be Permanent Worker in MWHE.

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 statement on recognizing workers' right of freedom of association and collective bargaining for the workers shown in GSEP (signed by Head of Upstream, CEO Down Stream & Commercial, Executive Director & CFO and MD of Sustainability & SSE dated 8 September 2015) and *Kebijakan Bisnis dan Hak Asasi Manusia* Sinarmas Agri Business and Food (signed by Head of Policy and Compliance Division, dated 12 December 2019). The policy is publicly available on the company website in bilingual (Bahasa Indonesia and English), and has been communicated to all workers. There was 3 Labor Union at MWHM, GKME, and MWHE and have been registered to Manpower Agency. All workers given freedom to choose their union. Based on result of document review, it's known that company also documented the number of labor union operating in company operations area and its members' number as per May 2022. For example, number of members of labor union in MWHM and MWHE are shown below:

- Labor Union of MWHM with 141 total members.
- Labor Union of MWHE with 598 total members.

Implementation of the policy is the existence of Labor unions. The election of administrators was also carried out democratically without any intervention from the company. Result of interviews with workers showed that union has been running in accordance with its purpose of conveying the aspirations of workers to the company. Besides, based on result of interview with labor union representatives, it has also known that there is not any intervention by company to the election of workers representative in Bipartite.

6.3.2

The company has well-documented the records of meetings between labor unions and management representatives as well as with internal union meetings. For example, record of meetings conducted by labor unions in 2021 has been shown as follow:

- Minutes of meeting dated 21 July 2021 concerning evaluation of OHS implementation of new normal in operational activities, held in MWHM attended by 14 representatives.
- Minutes of meeting dated 12 August 2021 concerning evaluation of PPE & HIRAC, and health protocol against Covid-19 for external party implementation, held in MWHM attended by 14 representatives.

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

6.3.3

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

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

Status: Comply

6.4
Children are not employed or exploited.
6.4.1

The company has policy on child and female workers as stated in Management Policy No. 002/SEHRDV/03/09 on 31 March 2009 and memorandum No 01/VPA11/2009 on 13 January 2009, regarding Prohibition for Child Worker (*Larangan Mempekerjakan Anak di Bawah Umur*). Document verification results reveal that there are no workers under the age of 18. The process of hiring employees this is evidenced by the Identity Cards at the time of employee recruitment. In addition to having a policy governing minimum age of workers for workers, Unit of Certification also includes a clause on child protection and a prohibition on employing workers under the age of 18 in any agreement with contractor. Based on document verification and interview with local contractor, it has been included into service contracts and supplier agreements.

6.4.2

The company has employee's recruitment policy on Golden Agri Resources Social and Environmental Policy dated 8 September 2015. It states that company will not employ children that fall within definition of provisions of ILO conventions, even though there are laws or regulations that will allow state and local states and against all form of child exploitation. This policy has also been disseminated through signs in housing and offices. The recruitment in accordance to request to fill in shortage or replace employee stops; additional request using the labor requirement form; the process of selection, interview, and medical checkup. Unit of Certification has a policy on child labor, signed by CEO and in CLA also stated that the minimum age for workers is 18 years old.

This policy has been communicated to all workers, suppliers and contractors respectively. Records of personal data of employees - age, marital status, position and rank, location of work, date of commencing employment - are kept. Checking records of last recruitment and interviews with employees confirmed that no one under 18 years old has been employed. During field observation at estates and mill also showed that there were not founds any workers under working age.

6.4.3

Based on field observation and verification of each estate and mill employee list documents for the period of April-May 2022, there is not any young worker, including students who carry out fieldwork practices at the palm oil plantations to meet the learning curriculum requirements.

6.4.4

The company has employee's recruitment policy on Golden Agri Resources Social and Environmental Policy dated 8 September 2015. It states that company will not employ children that fall within definition of provisions of ILO conventions, even though there are laws or regulations that will allow state and local states and against all form of child exploitation. This policy has also been disseminated through signs in housing and offices. The recruitment in accordance to request to fill in shortage or replace employee stops; additional request using the labor requirement form; the process of selection, interview, and medical checkup. Unit of Certification has a policy on child labor, signed by CEO and in CLA also stated that the minimum age for workers is 18 years old.

The company also showed that they had socialized the policy to relevant parties. For example, the socialization was held in March 2022 to workers in MWHM, MWHE, and GKME. Based on documents verification and field observation, there were no workers under the age

of 18 and there was no child around the work area. In addition, company also includes clauses on child protection and prohibitions on hiring workers under the age of 18 in any agreement. Company also put a warning board which disallowance the children existence in the work area.

Status: Comply

6.5

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

6.5.1.

Commitment to maintaining decency is regulated in Sexual Harassment and Violence Policy (No. 01 dated February 20, 2009), concerning the prevention of sexual harassment and violence and other forms, as well as to protect reproductive rights, such as prohibition of female workers who are pregnant breastfeeding from working in fields related to chemicals and other heavy work. To support this, Unit of Certification has formed a Gender Committee in each unit as a place to submit complaints and complaints regarding violations of reproductive rights/women and sexual harassment.

There is gender committee established to resolve if sexual harassment occurs. The policy on sexual harassment and reproductive rights of women are imposed on contractors by being included in their contractual agreements. Unit of Certification was developed protocol flowchart for sexual harassment reporting. Each of units (mill and estates) has their own gender committee that supported with annual work programs. Estates annual Work Programs, includes: socialization; counselling; monitoring; child care facilities monitoring; committee gender meeting; health services post (*Posyandu*). Based on document verification, company has also shown example of socialization of this policy to worker and contractor dated 16 March 2022.

Based on information from electronic media (website), gender committee and labour union representatives, as well as female employees, it was known that there is no negative issues and such case related to reproductive right, sexual harassment, violence and discrimination in the work place. Interviews with female workers during field visits (e.g. sprayers, loose fruit pickers, manual upkeep workers, etc.) confirmed that they understood the policy about sexual harassment and the reproductive rights.

6.5.2.

The company has Sexual Harassment and Violence Policy (No. 01 dated February 20, 2009), concerning the prevention of sexual harassment and violence and other forms, as well as to protect reproductive rights, such as prohibition of female workers who are pregnant breastfeeding from working in fields related to chemicals and other heavy work. Unit of Certification has also regulation of menstrual leave for female worker which is given for two days after it is checked by medical worker in clinic. Based on document verification sighted that company has also shown example of socialization of this policy to worker and contractor. The company has shown evidence of socialization which was attended by all workers on 16 March 2022. Based on document verification, company has given menstrual leave and maternity leave of female workers. For example, maternity leave was given 3 months of paid leave (1.5 months before give birth and 1.5 months after) while menstrual leave was given for 2 days. The company has also documented pregnant women and young mother on each unit for period of 2021-2022. For example, Unit of Certification has shown monitoring of pregnant women and young mother monitoring in MWHM in 2022. Based on result of document verification, there are no pregnant women and young mother in MWHM.

Based on the interviews with the gender committee and day care officer, company had given time for breastfeeding woman and provided certain place for breastfeeding. This is one evidence that the company supports the protection of reproductive rights, especially for women.

6.5.3

Based on the interviews with gender committee representatives and field observation, it is known that the company has provided a certain place for breastfeeding at day care with special time to breastfeed. There was no prohibition from supervisors in field related to this matter.

The company has specifically provided need for new mother or breastfeeding workers to breastfeed by setting a special time for breastfeeding at work, the availability of a special room for breastfeeding and other supporting facilities. Unit of Certification also showed the result of new mother's needs identification by Gender Committee as for example in MWHE which was conducted on 5 January 2022. This document informed the needs of new mother during the give birth and after give birth as follows: maternity leave, day-care, breastfeeding room, consultation related to mother health in clinic, etc.

6.5.4

The company has shown procedure to accommodate complaints and grievances from employees specifically in sexual harassment and violence showed in socialization to all workers and stakeholders. The company have a Procedure of Complaint and Grievance No.

SOP/SMART/GIMS-SCMD/USDV/I/001 (Rev. 02) dated 11 April 2017. The procedure has a guarantee of anonymity and whistle-blower. Based on the interviews with workers, it is known that workers already have sufficient understanding of the grievance mechanism. Related complaints of sexual harassment can be submitted to the gender committee.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1

The company has established and documented policy about force or trafficked labour in Social and Environment Policy article 3.1 stated "Acknowledge, Respect, and Strengthen workers right". The company forbids child labour, forced labour, provide work contract in language that understand by workers and make sure the payment gives to workers in simple ways, on time and clear.

The company has also shown that on each work agreement between company and contractor/supplier, there were clauses related to fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the contractors. Some of these obligations are related to anti-bribery, anti-corruption, and anti-forced labor. To ensure compliance with these clauses, the certification unit always requests the requirements for the completeness before contractor does work.

Based on result of interview with manpower agency, gender committee, labor union, and workers at estates and mill, there is no issue of discrimination and forced labor in company. There were no significant obstacles related to employment or violations of company's regulations. The company provided output targets that can be obtained in 7 hours of work. If the harvester obtains more output within or more than 7 working hours, then the harvester will get the incentive payment. No penalty was given to the harvester if it does not get output due to natural factors such as rain. Based on payment list, the harvesters have earned above the minimum wage.

There were no pressure/forced in doing overtime work, workers who had overtime at company can refuse if ordered to do overtime activities because overtime is not the worker's obligation. Based on interview with workers, labor union and gender committee, all work in Unit of Certification was done voluntarily. There are no practices of retention of identity document, payment of recruitment fee, contract substitution; lack of freedom to resign, debt bondage, and withholding of wages in the Unit of Certification.

6.6.2

The company has developed GSEP (signed by Head of Upstream, CEO Down Stream & Commercial, Executive Director & CFO and MD of Sustainability & SSE dated 8 September 2015), which states that the company recognize, respect and strengthen workers' rights, including contract workers, temporary workers, and migrant workers of all genders, in line with International best practices such as the ILO Declaration on Fundamental Principles and Rights at Work. The company committed to provide equal opportunities for all workers and embrace diversity regardless of ethnicity, religion, disability, gender, political affiliation, sexual orientation or trade union membership, and ensure workers are protected from acts of discrimination at all stages of the employment relation.

The company still has workers with contract status for few works such as field worker. All the rights for each employment status have been distinguished for workers with contract status and the permanent status. There was no discrimination between contract workers and permanent workers. The company has also socialized about its policy and procedure related to prohibition of worker discrimination in company to workers.

Based on document verification sighted that there are no migrant workers on this company, there are only permanent and contract workers. In addition, based on interview with worker union board sighted that so far, there has never been a penalty for termination of employment, bonded labor practices, withholding wages, and forced overtime.

Status: Comply

6.7

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

6.7.1

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

- The establishment of the *P2K3* (OHS Committee) for PT Kresna Duta Agroindo (MWHE) which were registered / approved by the Manpower and Transmigration Agency of Kutai Timur Regency in 01 April 2015 (Decree No. 566/502/P2K3/Was).

- The establishment of the P2K3 (OHS Committee) for PT Kresna Duta Agroindo (GKME) which were registered / approved by the Manpower and Transmigration Agency of Kutai Timur Regency in 25 April 2016 (Decree No. 566/865/P2K3/Was).
- The establishment of the P2K3 (OHS Committee) for PT Kresna Duta Agroindo (MWHM) which were registered / approved by the Manpower and Transmigration Agency of Kutai Timur Regency in 02 April 2015 (Decree No. 566/508/P2K3/Was).

OHS committee routinely conducts monthly meetings on OHS issues in the workplace. The documentation of the meeting was recorded and stored well. Based on interviews to workers who are members of the P2K3 organization it is known that monthly meetings are always routinely conducted to discuss about OHS such as consistency of PPE usage, work accident analysis, report, firefighting simulation, checking of emergency response equipment, OHS sign board, safety patrol, etc. The last *P2K3* Meeting in 13 May 2022 on which discussed the evaluation of the annual evaluation of OSH implementation, preparation of insecticide, and others attended by *P2K3* officers. The certification unit has also routinely reported P2K3 reports to relevant agencies, such as the following example:

- The P2K3 report of PT Kresna Duta Agroindo – MWHE for the first quarter of 2022 has been reported to the Manpower and Transmigration Agency of Kalimantan Timur Province on 17 May 2022.
- The P2K3 report of PT Kresna Duta Agroindo – GKME for the first quarter of 2022 has been reported to the Manpower and Transmigration Agency of Kalimantan Timur Province on 17 May 2022.
- The P2K3 report of PT Kresna Duta Agroindo –MWHM for the first quarter of 2022 has been reported to the Manpower and Transmigration Agency of Kalimantan Timur Province on 17 May 2022.

Based on the explanation above, it can be concluded that the certification unit has a person in charge of OHS which has been approved by the relevant agency, the availability of documents for periodic meetings between the person in charge and all the interests of all parties related to OHS have been discussed at the meeting.

6.7.2

The certification unit has a Procedure Emergency Preparedness, Response and Recovery (SOP/SMART/UMUM/SADV/II/005), Management of Accidents and Occupational Diseases Procedure (SOP/SMART/HESS-EHSD/SADV/II/005) has been ratified by certification unit. In that procedure has explained the handling of accidents from reporting to coordination. Simulation was performed regularly to ensure the preparedness of emergency response equipment in the certification unit. The routinely emergency simulation that has been conducted by certification unit for example:

- Emergency response simulation and first aid for mill workers on 24 Mei 2021.
- First aid training for first aid officer on 17-18 March 2022.

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

The last first aid training has been conducted in 17-18 March 2022 and certification unit has workers with licensed first aid officers. Certification unit also has a first aid box in each unit and based on document review, it's concluded that the contents in the first aid box are sufficient (21 items) and certification have total of 83 first aid kit. There is also a checklist of observations of the contents of first aid boxes routinely performed every month by first aid officers. There were zero accidents in PT Kresna Duta Agroindo since January until May 2022.

Based on interviews with workers in the fields of MWHE and GKME, it is known that since 2021 there has never been a work accident in all PT Kresna Duta Agroindo units and if an accident occurs in the field, the certification unit has provided first aid services at PT Kresna Duta Agroindo. Each foreman as first aid before a follow-up examination is carried out at the nearest clinic or hospital. The first aid officer (foreman) in the field states that training has been routinely carried out by the company and there are also several officers who have received certificates as First Aid Officers from government agencies and at the time the explanation of the use of each item is quite clear.

6.7.3

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

masks, face shields, gloves, boots, and others. In addition, the certification unit also has proof of the delivery of PPE to all workers every year and replacement of PPE that is damaged, for example the delivery of PPE in the form of safety shoes on 12 April 2022, and replacement of PPE in the form of safety shoes on the 18 February 2022 to 3 pesticide applicators. Every PPE given to all workers (all level workers) is in accordance with the needs, types of work, risks and conditions of the PPE, this has been well documented from the PPE award records kept by the OHS Department. This has been regulated in the hazard identification document, risk assessment and risk control (HIRAC) as well as the PPE For Every Job Specification document.

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

Opportunity for Improvement (OFI)

Based on the results of field observations at MWHM, it is known that there are several workers who work in one station using different PPE for foot protection, namely Safety Shoes and Boots (regular). In the SOP for Personal Protective Equipment Management (No. SOP/SMART/HESS-EHSD/SADV/010/005 dated July 01, 2014) in the PPE Requirements Standard section which explains that for workers working at sorting stations, loading ramps, sterilizers, presses and boiler stations, the shoes that must be used can be in the form of Safety Boots (Boots with toe caps/finger protectors) or Safety Shoes. However, according to the observations above, the shoes used are ordinary boots without toe caps/finger protection. In addition, the MWHM HIRAC document explains that the controls specified for the hazard sources that exist in each of these stations are procedures (IK), warnings and PPE.

Based on the results of interviews from the workers mentioned above, it is known that all of these workers have received PPE in the form of Safety Shoes every year by the company for free and are still in good condition to use, but when working the workers are more comfortable using ordinary boots compared to standard PPE. (Safety Boots (Boots with toe caps/finger protection) and Safety Shoes). For the last 3 months (March-May 2022) the company has always carried out OHS inspections which function as control over the implementation of OHS in the plantations and factories. From the inspection results, there were no violations related to the use of PPE that occurred at MWHM. In addition, in the recapitulation of work accidents for the past year (June 2021 – May 2022) there has never been a work accident in the factory environment.

Companies are encouraged to monitor compliance with the use of appropriate PPE in the factory operational area (MWHM).

6.7.4

Company provided health services such as clinics and paramedics. Based on field observations, it was known that the facilities and infrastructure provided for workers are still functioning properly. Based on the documents review and interviews with workers (harvesters, pesticide applicators, mill operators), it revealed that all workers (contract workers and permanent workers) were registered in the BPJS program, proven as follows:

- BPJS (Health Insurance) payments for MWHM, MWHE and GKME, have been completely fulfilled and the last proof of payment is on 5 June 2022 for period of June 2022.
- BPJS (Social Security Insurance) payments for MWHM, MWHE and GKME, have been completely fulfilled and the last proof of payment is on 2 June 2022 for period of May 2022.

Based on document verification and interview with worker and company result, there is accident occurred on 24 May 2021 on behalf of NRY (initial) in MWHM which is categorized as major. This case has been reported to BPJS (Social Security Insurance) on 24 May 2021. PT KDA has shown process of its handling in this case based on document of transfer receipt of severance payment on 10 September 2021 and process of accident claim which was discussed recently with BPJS (Social Security Insurance) on 10 September 2021.

Based on the interviews with estate workers, mill workers and labor union, they informed that they had the acknowledgement of their involvement in BPJS program and they also held the BPJS card. Based on the document review and the interview with management representatives, it's known that accident which happened on period of 2022 has been handled by company.

6.7.5

The company is still consistent in monitoring the recording of occupational accidents by calculating the lost time accident (LTA). Recapitulation of work accidents with a formula to find the level of severity and frequency of accidents. This document informs the time

period, the number of working days, the number of no effective working days, overtime, hours of work in total, the number of accidents, the number of working days lost, hours of work a year, the number of accidents a year, lost days a year. Calculation of Severity Rate and Frequency Rate is reviewed regularly and monitoring will be evaluated at the monthly meeting of Committee of Occupational Health and Safety. For examples in period of January until May 2022 certification unit have doesn't have any accident, zero lost time, Severity Rate and Frequency Rate is zero.

Status: Comply

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

7.1

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

7.1.1

Strategy on pest integrated management has refers to procedure related to integrated pest observation and control (procedure has been ratified in 15 July 2020), among others:

- Rat Control Procedure (IK / Smart / MCAR / VII / TA-HPT / 07). Censuses on mature plants are conducted every 3 months namely January, April, July and October. The critical threshold of rat attack is 5% of the census. Biological control by owl observation. Chemical control using rodenticides.
- Detection procedure for nettle caterpillars (IK / Smart / MCAR / VII / TA-HPT / 01). LEC (Leaf Eating Caterpillar) detection is done every 2 months. In the event of an attack there is no need for detection but rather a census.
- Palm Oil Eater (IK / Smart / MCAR / VII / TA-HPT / 03) caterpillar Control Procedures by planting beneficial plants, such as *Turnera subulata* and *Cassia* spp along Main Road (MR) and Collection Road (CR), and *Antigonon leptopus* on the corner block.
- Work instruction census and control of *Ganoderma* (IK / Smart / MCAR / VII / TA-HPT / 10). Census is carried out on 100% of plants using a plant census map. In endemic areas the census starts when the plant is 3 years old and if there is no attack the census is carried out once a year.

Certification unit are able to shows realization of integrated pest control plans in 2020-2021. For example, record of census is presented as follows:

- Rat and LEC (Leave Eating Caterpillar) census for GKME in May 2022 with the average attack below 5% and there is no sign of attack in several periods of census time in 2021. below the minimum economic threshold so that the certification unit does not control activities with chemicals (pesticides) and still uses natural controls such as the use of beneficial plants / predators (barn owl).
- Rat and LEC (Leave Eating Caterpillar) census for MWHE in May 2022 with the average attack below 5% and there is no sign of attack in several periods of census time in 2021. below the minimum economic threshold so that the certification unit does not control activities with chemicals (pesticides) and still uses natural controls such as the use of beneficial plants / predators (barn owl).

In general, based on the recording of Pest and Disease Monitoring Census it is known that there are no pests and diseases that cross the minimum economic threshold.

In order to avoid Pest & Disease (include weeds) resistance and prophylactic uses of pesticide, certification unit had substitute and/or rotate the use of pesticides for the same target, for example, in term of broad leaf control, the use of pesticide with active ingredient *Methyl Metsulfuron* could be substitute with pesticide with active ingredient *Triclophyr Butoksi Ethyl Ester*, *Dimethyl Amine* and *Isopropyl Amine Gliphosate*.

In addition, during the field observation activities carried out at the GKME and MWHE units it was known that there were beneficial plants planted on each edge of the block as host plants for predators for LEC (Leaf Eater Caterpillar) control and there was also the use of barn owl (*Tyto alba*) as pest control for rat. The unit of certification has facilitated the use of barn owl by creating nests with a ratio of 1:30 in each unit (GKME and MWHE). The results of the review of monitoring documents on the existence of active nest updates up to the period of May 2022 are for GKME with a total of 103 nests, 82% of which are active and MWHE with a total of 117 nests which 83% are active.

7.1.2

The certification unit has shown a list of invasive species in 2022 referring to Environment and Forestry Ministry Regulation No. P.09 / MENLHK / SETJENKUM.1 / 12/2016. Based on the documents shown, it is known that there are two (2) species used for biological control agencies, namely *Turnera subulata* and *Tyto alba*. Related to this, the certification unit has conducted monitoring activities to ensure /

monitor their distribution.

7.1.3

Based on the review of the PT Kresna Duta Agroindo IPM (Integrated Pest Management) document since 2021-2022 (May), there were no extraordinary circumstances requiring pest control with fire, the results of the document review show that the pest condition is still under control every year and below the economic threshold so that no chemical control or fire control has been carried out so far. Based on the results of field visits to GKME and MWHE, there were no indications of burn marks after the use of fire for pest control.

Status: Comply

7.2

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

7.2.1

The certification unit has SOP and work instruction on weeds management, the guidance covering about chosen, storage, application, contaminated handling, known about signs and symptoms of pesticides poison and first aid for poison case. To ensure pesticide used are in accordance with the target, certification unit conducted identification the type of weed found in operational area.

Pesticide usage justification has shown through census analysis. for example, as follows:

- Rat and LEC (Leave Eating Caterpillar) census for GKME in May 2022 with the average attack below 5% and there is no sign of attack in several periods of census time in 2021. below the minimum economic threshold so that the certification unit does not control activities with chemicals (pesticides) and still uses natural controls such as the use of beneficial plants / predators (barn owl).
- Rat and LEC (Leave Eating Caterpillar) census for MWHE in May 2022 with the average attack below 5% and there is no sign of attack in several periods of census time in 2021. below the minimum economic threshold so that the certification unit does not control activities with chemicals (pesticides) and still uses natural controls such as the use of beneficial plants / predators (barn owl).

Based on the results of the census, it is known that the certification unit does not use pesticides to control pests or disease, the use of pesticides is only carried out as a land sanitation activity to control weeds.

The unit of certification has a list of types of pesticides used in the past year along with a description of the active ingredients, registration number and validity period of the pesticide. The following is an example of a list of pesticides used by companies, for example:

Trademark	Active Ingredients	Registration Number
Starane	<i>Fluroxypyr methyl heptyl</i>	RI. 0103011988854
Roll Up	<i>Gliphosate Isoprophylamine</i>	RI. 01030120042133
Erkafuron	<i>Metsulfuron methyl</i>	RI. 01030120042133
Garlon	<i>Triclopir butoksi etil ester</i>	RI. 01030120042133
Erkatril	<i>Coumatetralyl</i>	RI. 01030120042133

The certification unit has documented records of pesticide toxicity in the document of Monthly Pesticide Toxicity Data. The document is recorded product name, active ingredients, LD₅₀, area treated, amount of active ingredients applied per Ha, and total application. This document is constantly recorded and updated by Estate Sustainability Officer each month. Unit certification has also classified the pesticides used according to the WHO class, such as Erkafuron 20 WP (*methyl metsulfuron*) with the WHO classification, namely unlikely to present, Garlon (*triclopir*) with the WHO classification, namely class 3 and so on.

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- activities with chemicals (pesticides) and still uses natural controls such as the use of beneficial plants / predators (barn owl).
- Rat and LEC (Leave Eating Caterpillar) census for MWHE in May 2022 with the average attack below 5% and there is no sign of attack in several periods of census time in 2021. below the minimum economic threshold so that the certification unit does not control activities with chemicals (pesticides) and still uses natural controls such as the use of beneficial plants / predators (barn owl).

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7.2.3

The certification unit has carried out the IPM quite effectively, with no use of chemicals for pest control and does not use pesticides as prophylaxis. The pesticide used is routinely for weed control and if the conditions of the circle and path are still quite standard, weed control will be suspended.

The IPM programme already listed which is then detailed into a monthly work plan and daily work plan. The IPM program prioritizes routine monitoring of the presence of pests. Pesticides are the last alternative control if indeed the observations show a value above the control threshold. Basically, the application of IPM aims to minimize the use of pesticides in pest control.

The certification unit has shown a document on Recapitulation of Pest and Disease Census in which it contains the realization of the implementation of detection activities and census of disease pests. Based on realization of the caterpillar census and rat census census activities in 2022 PT Kresna Duta Agroindo, there are no indication of pest attack that has been above the minimum threshold, so no control is needed.

Based on document review and field observation, several IPM program with biological approach that has been implemented such as rat control by *Tyto alba*, and LEC (Leaf Eating Caterpillar) by planting beneficial plant such as *Turnera subulata* and *Antigonon*. Moreover, it has also conducted early detection routinely listed in the monthly report of early warning system. There is no prophylactic use. In January 2021 – May 2022, the certification unit does not use pesticide for pest control at all. Based on the results of interviews with pesticide applicators in GKME and MWHE, it is known that the use of pesticides is only for land sanitation activities as control of weeds and there has been no use of pesticides to control pesticides or disease since January until May 2022.

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7.2.5

The certification unit has show the President Director of SMART Tbk issued a memorandum not to use paraquat in 2016. Regarding to *Pesticides that are categorized as WHO Class 1A or 1B, there is Social and Environment Policy that stated* minimized and eliminated as part of a plan, and shall only be used in exceptional circumstances. Based on document verification and field visit to pesticide storage, there is no paraquat and WHO Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions application from January 2020 until May 2022.

7.2.6

The certification unit has provide safe working practices training on pesticide handling or application, for example as follows:

- Best Management Practices (BMP) Training which includes pesticide handling / application, manuring, sanitation, and IPM on 24 May 2022 at GKME with a total number of participants is 13 people.
- Best Management Practices (BMP) Training which includes pesticide handling / application, manuring, sanitation, and IPM on 11 May 2022 at MWHE with a total number of participants is 14 people.

The results of field observation in rinse house, PPE warehouse and interview with pesticide applicator GKME and MWHE, it is known that the aplicator have been given regular training in safe work practices. This was evidenced by the explanation for correct way to work in accordance with the procedures including how use and handling the risks in accordance with material safety sheets. There have been sheets of safety work (MSDS) and the symbols of hazardous and toxic materials are properly installed on the walls and doors of warehouse. The pesticide applicator also using personal protective equipment in accordance with specified hazard identification and material safety data sheet such as respirator mask, gloves, safety shoes, apron and googles. Furthermore, clean water and soap are available on the field. In addition, employees are also informed about the steps of secure work in each roll call in the morning before work. Meanwhile, the spraying workers interviewed also claimed that after spraying activity they will be washing up and drying up the PPE and spraying tools (sprayer tank, jerry, etc), and taking shower/changing clothes in special place near pesticide store of the division office. Therefore, in observation they have a storage for keeping all PPE's and spraying tools after use.

Based on the explanation above, it was concluded that those who applied the pesticide were employees who had attended the training, while the employees understood the dangers and risks related to the chemicals used.

7.2.7

Based on observation to Pesticide Store on the GKME and MWHE, it was known that all pesticides has properly stored on a warehouse, separated based on type, equipped with balance record, hazardous symbols, fire extinguisher, MSDS, first aid box, etc. Used pesticide containers will be used for pesticide mixing and distribution to the field. Meanwhile, the rest were send to Temporary Hazardous Waste Warehouse. Moreover, based on observation to employees housing complex, it was known that there is no use of used pesticide containers for domestic purposes.

7.2.8

The certification unit has SOPs and work instructions related to hazardous waste management which are contained in the

- SOP for Waste Management with document number SOP/SMART/LEMS-EHSD/SADV/II/002 dated July 2, 2014 which was legalized by the head of upstream. This procedure describes the identification and management of waste generated from the company's operational activities, including agrochemical packaging waste.

- Regarding the procedure, unit certification applies the steps outlined in the work instructions (known as IK) for the handling of the pesticide packaging produced (IK/SMART/LEMS-EHSD/SADV/002/001), among others by doing:
 - Separate the used pesticide packages measuring 20 liters and sizes <20 liters. Visually make sure that the packaging submitted does not contain chemical residues
 - Bring the used pesticide packaging <20 liters to the hazardous waste storage and record it in the logbook
 - Bring the used pesticide packaging 20 liters to the pesticide packaging rinsing place
 - Enter pressurized clean water of $\pm 1/10$ of the volume of the container and rinse by shaking until it hits the entire wall of the container. Rinsing was carried out 3 times. Collect the rinsed water into the rinse water reservoir
 - Store rinsed clean packaging in the warehouse, used rinsed packaging can be reused for the same activities and/or stockpiled and/or returned to the supplier and/or in accordance with the MSDS of the material.
 - The remaining rinsing water can be used for the next mixing process to optimize the use of agrochemicals.

From the results of field visit in housing area at Muara Wahau Mill, it was found that there were no traces of chemical packaging used as water reservoirs or other housing activities. From the results of documents review, in the form of waste manifests and Hazardous Waste Processing Data for washing log book and management purposes, it is used as a water container for spray activities. Based on interviews with employees and the foreman of pesticide application Muara Wahau Estate, it is known that all pesticide packaging is collected at the designated storage area and the company coordinates with collectors to recycle and not be used for purposes other than pesticide application activities.

7.2.9

Based on information from estate management, and previous reports, it was known that there were no pesticide application through aerial method by plane. All pesticides has applied through spraying both manually.

7.2.10

The certification unit regularly have a medical examination for manuring and pesticide operator. GKME and MWHE has a list of the latest pesticide operator as many as 114 workers. All manuring and pesticide operator has examined health through inspection types of medical checkup and cholinesterase, to ascertain the condition of workers in good health. The last examination in semester 2 was conducted in 04-08 March 2019 for GKME and MWHE. Examination results stating that all workers spray is in a healthy condition. Auditor conduct interviews with spraying workers in GKME and MWHE and they admit that they have not been exposed to skin disease and itches because they always use PPE while working.

Opportunity for Improvement (OFI)

The company has carried out regular health checks for all of its employees once a year for units of GKME, MWHE, and MWHEM which were carried out in the period March 2022. The last special medical examination was carried out in 2019 and in accordance with the provisions conducted twice a year (6 months) for workers with high risk levels. In 2020-2021 the company does not carry out special health examination activities due to the COVID-19 Pandemic so that activities that cause large gatherings of people are limited. In 2022 the company has planned to implement it in early 2022, but it is constrained by the condition of the cholinesterase, spirometry and audiometry examination equipment that it owns has experienced problems because it has not been used for 2 years.

To overcome this, the company plans to submit the special medical examination to a third party in accordance with Letter No. 12/SPO-KT1/KALTIM 1/6/2022 dated 20 June 2022 regarding the Application for a Special Health Examination for PT Kresna Duta Agroindo. The letter was based on the submission of examination prices from 2 vendors (Berau Khatulistiwa Clinical Laboratory and Permata Melak Clinical Laboratory) which were submitted to the company on June 6, 2022. Based on the results of interviews with management, it is known that the realization of the special medical examination activity is planned for July, 2022.

Companies are encouraged to ensure that these special health checks can be realized by 2022.

7.2.11

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

Status: Comply

7.3
Waste is reduced, recycled, reused and disposed of in ways that are environmentally and socially responsible manner.
7.3.1

The certification unit already has SOPs and work instructions related to Hazardous and Toxic Waste management which are contained in the SOP for Waste Management with the document number SOP/SMART/LEMS-EHSD/SADV/II/002 dated July 2, 2014 which signed by the head of upstream. This procedure describes the identification and management of waste generated from the company's operational activities, for example:

- Solid waste in the form of shells, fiber and empty leaves is fully utilized to support plantation activities and palm oil processing factories. The shell and fiber are used for boiler fuel, while the empty leaves are applied as organic fertilizer in oil palm plantations.
- Liquid Waste from processed FFB (Raw effluent) is fully utilized for plantation activities as organic liquid fertilizer (Land Application) after going through the processing process in a wastewater treatment plant (WWTP) pond to meet the quality standard requirements according to regulations.
- Boiler ash is used for stockpiling.
- Liquid waste from ex-factory operations is accommodated in a sedimentation tank to settle dissolved solids. The solids in the sedimentation tank are then removed and stockpiled periodically, while the sediment water is discharged into the waters
- Waste gas is generated from boiler chimney and generator emissions. Gas waste is periodically monitored for emission tests in accordance with applicable regulations
- Domestic solid waste in the form of household and office waste is managed by collecting and stockpiling in the final waste disposal site and the final waste storage requirements are far from settlements, flood-free locations, and not swampy puddles.
- Hazardous waste is stored in hazardous dan toxic waste storage and handling according to its type and characteristics.
- Non-solid hazardous waste is collected and can be reused or sold.
- Medical waste in the form of used syringes, expired drugs, used bandages, etc., is stored in a place provided and handed over to a hospital that has a permit for destruction.

Regarding the procedure, unit certification applies the steps outlined in the work instructions, such as;

- Handling of pesticide packaging produced with No. IK/SMART/LEMS-EHSD/SADV/002/001
- Handling of used fertilizer packaging with No. IK/SMART/MCAR/IX/TA-PPK rev.01 February 1, 2019

Hazardous and Toxic waste

Unit certification has a temporary storage permit for Hazardous and Toxic waste, through the document;

- **MWHM, GKMM and GKME:** Based on the Decree of the Regent of Kutai Timur No. 660/K.448/2017 dated June 13, 2017 regarding the extension of the permit for temporary storage of hazardous waste to PT KDA units GKMM-MWHM and GKME located in Muara Wahau District, Kutai Timur Regency with a validity period of up to 5 years.
- **MWHE and Muara Wahau Transport:** Based on the Decree of the Regent of Kutai Timur No. 660/K.323/2018 dated 18 May 2018 regarding hazardous storage waste for MWHE and Muara Wahau Transport units with a validity period of up to 5 years.

The types that can be stored are; used lubricating oil (used oil and grease), used filters, electronic waste, used rags and the like, used batteries, used dry batteries, used hoses, used toner, chemical waste that has not been coded, expired materials not used up, packaging contaminated with hazardous waste, absorbance contaminated with hazardous materials, soil contaminated, and infectious waste.

In the management, utilization and/or processing of waste PT Kresna Duta Agroindo collaborated with licensed parties.

Solid waste

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

Liquid Waste (POME)

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

Domestic Waste

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

Based on the results of field visits to the MWHM and MWHE housing areas, there are traces of burning waste in which there is residual plastic waste. In addition, there is garbage piled up in the Blok C10/11 MWHE area and behind the Pondok 2 MWHE house. The company has solid, liquid and air waste management procedures in the Waste Management SOP with No. SOP/SMART/LEMS-EHSD/SADV/II/002 dated July 2, 2014 which was approved by the Head of Upstream explained the identification and management of waste generated from the company's operational activities, such as:

- Waste management within points 2.2.4 (b) yaitu, "*Pengelolaan limbah dilaksanakan dengan ketentuan internal Perkebunan Sinar Mas dan Peraturan Perundangan yang berlaku merujuk kepada pendekatan mekanisme produksi bersih yang menerapkan beberapa prinsip, antara lain: (1) Reduce, Reuse dan Recycle (3R), (2) Zero burning atau tidak boleh membakar, dan (3) Disposasi atau penimbunan.*"
- Domestic solid waste management in the form of household waste is described in points 2.2.4 (i.3) yaitu, "*Limbah anorganik dikumpulkan pada tong/bak sampah yang telah disediakan untuk selanjutnya diangkut oleh truk pengangkut sampah ke Tempat Pembuangan Sampah Akhir (TPSA) pada areal kebun untuk ditimbun, atau dikelola dengan prinsip 3R (Reduce, Reuse, Recycle).*"

In addition, the company has shown evidence of domestic waste management documents as follows:

- Documentation of garbage cleaning on 23 June 2022 in the MWHM housing area and Block C10/11 MWHE.
- Minutes of socialization on housing cleanliness, waste separation, no burning of garbage, prohibition of using hazardous containers in cottages on 22 June 2022 to 34 people at MWHM and GKMM.
- Environmental patrol program in housing which is planned once every 1 year in 2022.

Thus, companies are encouraged to carry out waste management that is documented and implemented. **OFI**

Based on the results of field observations carried out in the hazardous dan toxic waste storage area, it shows that the company has carried out hazardous dan toxic waste management by installing emergency response facilities such as fire extinguishers, first aid kits, alarm, eye wash, shower and other equipment such as coordinate points, warning boards and installing symbols and labels according to the type of waste stored. In addition, there is also a waste recording logbook for monitoring amount of waste in storage. Hazardous waste also handled properly by disposed based on each toxicity and hazardous characteristics, such as medical waste which is classified as infectious.

7.3.2

The company already has a document on the results of monitoring the implementation of hazardous and toxic waste management procedures according to PP No. 22 of 2021 which is contained in several documents, including:

- Document of hazardous waste source identification results for the 2022 period which provides information regarding the sources of hazardous and toxic waste that have been identified by the company, either from the plantation or from the mill.
- Balance Sheet and Logbook for storing hazardous and toxic waste at the storage area.
- Conducting socialization of hazardous and toxic waste management to employees.
- OHS Completeness Monitoring Document for the period 2021 which informs the condition and completeness of emergency response facilities in storage areas, such as first aid kits, eye wash and shower checks, fire extinguishers, spill kits (majun) and alarms. The monitoring results show that all equipment is in good condition and in accordance with company SOPs.

From the results of the document review by comparing the balance sheet and logbook, it can be seen that the submission of waste to storage for February 2022 was appropriate and there was no difference in the amount submitted. Thus it can be concluded that there are no recording errors and discrepancies based on the Balance Sheet, Logbook and Festronek documents, this indicates that the company has properly documented the storage and handling of hazardous waste. So it can be concluded that the company carries out waste disposal according to procedures that are fully understood by workers and managers.

The result of interview with manager related to proper disposal of domestic waste known that there are trash bins and routine transportation carried out by management but in the rainy season delayed due to road conditions, management also held the socialization periodically on housing cleanliness, waste separation, no burning of garbage, prohibition of using hazardous waste containers, and segregation between organic and an-organic waste before disposed in Landfills.

7.3.3

The unit certification does not use open burning for waste disposal. It can be proven through document review and management interviews, that the company has a Waste Management Procedure document with No. SOP/SMART/LEMS-EHSD/SADV/II/002 rev. 00. The scope of this procedure is for factories, estates, housing, and offices at PT Kresna Duta Agroindo, as a reference for handling agrochemical waste including used pesticide packaging, palm fronds, liquid waste, empty bunch fruit, solid decanter waste, hazardous waste, household (domestic) and office waste.

Waste management applied based on Sinar Mas plantation internal regulations and government regulations on a clean production approach with several principles, including:

- Reduce, Reuse, and Recycle (3R)
- Zero burning
- Disposal

It is also proven through the waste transportation manifest and the results of field observations in housing area there are traces of burning waste in which there is residual plastic waste. Interviews with employees who live in the housing estate explained that the burning was carried out because of the accumulation of garbage caused by delayed waste transportation due to road conditions during the rainy season. This has become an opportunity for improvement in indicator 7.3.1

Status: Comply	
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7.4

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

7.4.1

The certification unit has shown SOP Fertilization (SOP/SMART/MCAR/IX/TA-PPK) which aims as a guide in conducting fertilization in accordance with management policies. The scope of fertilizing activities in the SOP covers all activities related to fertilizing oil palms in nurseries, Immature Producing Plants and Producing Plants both inorganic fertilizing and by oil palm products based on the results of soil and leaf analysis. Certification unit has been implemented those procedure to optimize the production, such as:

- Routine soil and leaf sampling by SMARTRI to ensure the elements needed by plants to be able to produce optimally. The results of soil and leaf analysis tested will be the basis for determining the dose of fertilizer in each Estate.
- Fertilizing activities that prioritize the principles of being on time, on target, on the right dosage and on application. In addition, marginal soils are given extra fertilization in the form of empty bunch at a dose of 250 kg / stand.
- Application of palm oil wastewater (POME) to improve soil fertility with a total discharge of liquid waste applied during January - December 2021 of 206,795 m³.
- Maintenance of ground cover plants to reduce evaporation (maintain soil moisture). For example, planting legumes (*Mucuna bracteata*) and maintenance of soft fern (*Nephrolepis bisserata*). To all spraying employees are always conveyed at the morning apple to not spray the plant.
- The company's commitment to no longer use herbicide-based active ingredients since 2016. Based on the information from managers and staff, this is to show the company's commitment to support RSPO guidelines on reducing / not using herbicide groups 1A and 1B as well as parcels.
- Monitoring of the implementation of SOPs, among others, is carried out through an internal audit mechanism conducted by the OIA Department every semester.

Based on observation at Land Application area it was found that POME had been applied to the land in accordance with the permits and recommendations held. This activity showed the company's efforts to increase soil organic content thereby increasing soil nutrients needed roots especially on marginal soils and there is no overflow/spill to the field.

7.4.2

The Certification unit has routinely monitored the changes on the nutrient status based on the regular soil sampling unit (SSU) and leaf sampling unit (LSU) analysis to determine fertilizers recommendation. The sampling spot has been determined in each division and block routinely by SMART Research Institute (SMARTRI) and it's supported by well-trained census officer in each estate. The LSU is conducted annually. The last LSU result was issued on 23 June 2022, the indicators observed include levels of N, P, K, Mg, Ca, B, Zn, Cu, Cl, Fe and Na and supporting data in the form of visual observations. The SSU is conducted every 5 year for trees with age of 3, 8, 18 and 23, and the last SSU result was issued on 25 November 2021. The realization of the evaluation of the status of soil fertility in PT Kresna Duta

Agroindo is to observe the determination of pH, organic C content, total N (in%), total P content and available P, K content, Mg content, Na content, Ca content and Cation Exchange Capacity (CEC). Visual observations performed every year at the time of leaf analysis activities. Visual observation is a consideration in determining the fertilizer recommendations, deficiency of nutrients and analyze the potential of disease which is likely to become endemic of a particular disease.

7.4.3

The unit of certification has several procedures that explain the nutrient recycling strategy that has been implemented in the field, including:

- SOP / SPO / SMART / LH-09 concerning Waste Management
- IK.SMART/MCAR/IX/TA -PPK / 14 concerning Fertilizing using Palm Oil Mill Liquid Waste
- SOP / SMART / LEMS-EHSD / SADV / I / 002 Rev 0.0 concerning Waste Utilization

Apart from chemical fertilizers, certification unit has also implementing nutrient cycle strategy for soil fertility purposes, through application of by products, such as empty fruit bunch (EFB) mulching and land application by palm oil mill effluent (POME). Dosage of EFB mulched was 40 ton/ha/year (or about 250-300 kg/palm/year) in mature areas, which depends on field condition. Furthermore, dosage of POME applied were about 750 m³/ha/year. For example, record of by-product application is presented as follows:

- From January to May 2022, total of EFB applied in GKME was 58,664 kg and MWHE was 58,004 kg. Based on observation and interview with the workers, it was known that EFB has applied on the inter-rows and inter-palms with dosage 250 kg/stand.
- From January to May 2022, total of POME applied on the permitted areas were 38,152 m³. Based on observation to LA location, it was known that LA has satisfactory implemented. There is no overflow/spill to the field.

Visually, there is no symptom of nutrient deficiency at the blocks that have been visited. Until the recertification, the certification unit has not carried out replanting activities, so there was no use of the palm residue after replanting.

7.4.4

The certification unit shows record of fertilizer application for period January to December in every year. For example, summary of fertilizer application on 2022 (January-May) PT Kresna Duta Agroindo is summarized in the following Table.

Fertilizer	MWHE (Kg)	GKME (Kg)
Urea	67,850	162,350
MOP	100,450	26,750
RP	4,000	80,150
HGFB	16,007	15,004
Dolomite	-	7,550
Kiserite	-	27,800

Based on the table above, it is known that in 2022 (January-May) the achievement of fertilization realization has been achieved as much as 40.3% for GKME and 22.3% for MWHE. The overall achievement will be pursued up to 100% which is targeted by the end of December 2022 to have been fully achieved.

Status: Comply

7.5

Practices minimise and control erosion and degradation of soils.

7.5.1

PT Kresna Duta Agroindo memiliki soil type map with the scale of 1:40,000 which explains the type of soil in each unit. The following is an example of an existing soil map for GKME and MWHE units:

- **GKME Soil Map**

Consists of areas typic endoaquept, typic dystrodeft, and typic hapludults. The area mapped is 3,283.22 Ha and has been mapped in the land map unit for the area of PT. KDA with a scale of 1: 40,000 (Reg No.: 115/202/PMNP/II/11) in 2011. Based on the identification carried out by the PMNP survey team, there are areas categorized as S3 (marginally appropriate) and S2 category (medium appropriate). There is no type of soil that is classified as peat. There is a land slope of 21-40% covering an area of 152.21 Ha with a dusty clay texture, sandy loam and clay.

- **MWHE Soil Map**

Consists of areas typic endoaquept, typic dystrodeft, and typic hapludults. The area mapped is 3,590.22 Ha and has been mapped

in a land map unit for the area of PT. KDA with a scale of 1: 40,000 (Reg No.: 128/202/PMNP/II/11) in 2011. Based on the identification carried out by the PMNP survey team, there are areas categorized as S3 (marginally appropriate) and S2 category (medium appropriate). There is no type of soil that is classified as peat. There is a land slope of 21-40% covering an area of 348.87 Ha with a dusty clay texture, sandy loam and clay.

Based on the explanation above, it can be concluded that the company already has maps that identify marginal and fragile soils, including land with steep slopes.

7.5.2; 7.5.3

Since audit activities were carried out in 2020, the management unit had not yet carried out any replanting or new development activities. Likewise, with the replanting plan. Based on the results of the document review, show that the oldest planting year in the certification unit area is 1998 (24 years) while the youngest is 2004 (18 years) so there are no plants with the category of new planting or replanting. In the programme 2022-2026 there are plans for replanting activities within the scope of PT Kresna Duta Agroindo certification in 2025.

Status: Comply

7.6

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

7.6.1

The certification unit has a soil suitability map report which included a description of the soil types, topography, soil texture, drainage condition, land suitability level, and the limiting factor. The map is available on a 1: 150,000 scale. Soil types in PT Kresna Duta Agroindo such as typic endoaquept, typic dystrodept, typic hapludults and typic hapludults inclusi. There is no peat area at PT Kresna Duta Agroindo.

7.6.2; 7.6.3

Since audit activities were carried out in 2020, the management unit had not yet carried out any replanting or new development activities. Likewise, with the replanting plan. Based on the results of the document review, show that the oldest planting year in the certification unit area is 1998 (24 years) while the youngest is 2004 (18 years) so there are no plants with the category of new planting or replanting. In the programme 2022-2026 there are plans for replanting activities within the scope of PT Kresna Duta Agroindo certification in 2025.

Status: Comply

7.7

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

7.7.1; 7.7.2; 7.7.3; 7.7.4; 7.7.5; 7.7.6; and 7.7.7

The certification unit has a soil suitability map report which included a description of the soil types, topography, soil texture, drainage condition, land suitability level, and the limiting factor. The map is available on a 1: 150,000 scale. Soil types in PT Kresna Duta Agroindo such as typic endoaquept, typic dystrodept, typic hapludults and typic hapludults inclusi. Other than that, according to hectare statement, it was known that palms in PT Kresna Duta Agroindo were planted between 1998 to 2004, and there was no new planting and development areas after 2005. There is no peat soil in operational area at PT Kresna Duta Agroindo.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The certification unit has a water management plan that is implemented to support efficient use of water sources and continuous availability, through operational procedure documents to control the Protection of River Border Areas with document No. SOP/SPO/SMART/LH-06 dated 1 July 2010, which contains: objectives, scope, references, definitions, duties and responsibilities, and work steps. To avoid negative impacts on other users in the water catchment area, the company carried out activities, including: prohibiting the planting of oil palm on the river border with a width of 50 meters left and right, prohibiting land cultivation on the river border by installing notice boards, constructing boundary roads in managed areas (known as *pringgan*), cultivation without spraying (no spraying) around the river, manual maintenance. Some examples of management and monitoring procedures that the company has, such as:

- Procedures for managing and monitoring water resources with document No. SOP/SMART/BCOS-EHSD/SADV/II/2014 dated July 1, 2014 which was approved by the sustainability head which explains the plan for managing and monitoring water resources, water resources conservation techniques based on the *KepPres* No. 32 tahun 1990, for example planting erosion-reducing plants, manual maintenance of oil palms, outreach activities, and monitoring of water resources.
- Memorandum No. 002/SMD OPS/II/2009 dated January 6, 2009, which explains that in clearing land for new plantings, it is ensured

that the watershed is protected by not opening the riverbank area as wide as 50 – 150 meters depending on the size of the river. In that area, a notice board should be installed that the area is a protected watershed area and should not be cultivated. On the border of the managed area with the watershed area, a border road (known as *pringgan* area) should be made.

In its implementation of water management as an effort to support efficient use of water sources and continuous availability, as well as avoiding negative impacts on other users in the water catchment area, the certification unit conducts periodic testing of surface water and groundwater which is carried out and reported every semester, stated in the RKL-RPL report for each unit. For example for the period July-December 2021. Surface water quality testing is carried out by the laboratory which has been accredited by KAN, at several sampling points at PT Kresna Duta Agroindo, including; Pantun River, Elang River, and Pesab River.

The test results of PT Kresna Duta Agroindo on river water quality with quality standard of PP No. 22, 2021, and groundwater quality testing with the quality standard of *Peraturan Menteri Kesehatan* No. 32, 2017 attachment II regarding the requirements and monitoring of water quality, it is known that all parameters are still in the applicable quality standards.

Several management activities have been carried out by the company to avoid negative impacts on other users in the water sources area, including:

- Establishment of a riparian buffer zone/river border area with a width of 100 meters and make the area an HCV area
- Enrichment of plant species in river riparian areas, to restore the natural function of the river.
- Not replanting at the 100 meter boundary from the riverbank and marking yellow paint as the limit area for chemical application and conducting routine monitoring to replace or repair damaged marks
- Conduct socialization to the community, employees and contractors in the company area
- Installing information boards for activities limited to HCV areas, such as; prohibition of burning, hunting and maintaining cleanliness
- Periodic monitoring of river riparian areas

The results of interviews with resident in the housing area of Muara Wahau Mill workers revealed that there were no problem with availability of clean water, water was obtained free of charge, with the criteria of being odorless, colorless, and tasteless.

It can be concluded that there is access to clean water for workers and nearby villages, the certification unit carries out water management by monitoring water quality standards on a regular basis, to ensure that there is no contamination of the water used as a result of the activities of the certification unit, and as an efforts of sustainable management of water resources.

7.8.2

Water resource protection carried out at PT Kresna Duta Agroindo focuses on river borders which are also identified as HCV 4 areas. River border protection efforts refer to the 2014 Sustainability SOP, which aims to:

- Ensure the quality of river water so that it can be used sustainably
- To prevent high erosion and sedimentation

With a management strategy in the form of:

- Establish boundaries with the HCV attributes of environmental services
- Do not apply chemical fertilizers on riverbanks that have been designated as HCV
- Do not jack up natural wood saplings on river borders
- Planting erosion prevention plants on riverbanks to avoid high erosion
- Internal and external socialization (employees, staff, and community) in the scope of the plantation and mill

The company has documents on water management and maintenance of water sources for the period 2021. These include:

1. Report on the Implementation of the Environmental Management Plan (RKL) and Environmental Monitoring Plan (RKL) which contains management and monitoring of surface water (rivers) in plantations which are carried out every semester.
2. HCV Management and Monitoring Implementation Report containing management in the Pantun River, Elang River, and Pesab River. For example, based on HCV area management and monitoring report, the following activities have been carried out:
 - Set a border with the HCV attribute for Environmental Services with a red cross on the oil palm tree up to 50 meters/ 5th palm tree and create a "spray area boundary".
 - Installation of HCV boundary markers in forested valley areas, river border areas and conservation forests.
 - Prohibition of the application of chemical fertilizers on riverbanks that have been designated as HCVs. Palm oil that is in the

"spray area boundary" is maintained manually (chemically free) or by scratching the disc.

- Prohibition of jacking natural wood saplings on river borders.
- Planting erosion prevention plants on riverbanks to avoid high erosion
- Carry out rehabilitation activities for HCV areas at the border to return the river border area to a forested area, with the types of *vertiver grass, bamboo, guatemalagrass, etc.* For the period of 2021.
- Carry out rehabilitation plant maintenance carried out and reported by the HCV PIC for each plantation.
- Conduct direct socialization which is carried out periodically once a year to workers and villages around the plantation
- Installation of attributes, warnings, and posters in HCV areas, as an indirect means of socialization.
- Involve the community if there is an environmental conservation program that requires the attention of the surrounding community

Based on the results of field observations in the conservation area, the Elang River at MWHE Block C/D 12 and Block C8, also Pantun River at GKME Block I22 have been equipped with spray boundary signs, area boards protected areas, and planting areas of woody plants.

7.8.3

Management of POME from oil palm processing from the Gunung Kombeng Mill & Muara Wahau Mill with totaling 7 waste ponds with a multifeeding system that is by feeding simultaneously evenly. Based on these data, and when compared with the responsibility contained in the Permit document from DPMPTSP Kutai

Regent No. 503/02/DPMPTSP-PPNP/LA/II/2020 indicates that the company has complied with. Before being used, the liquid waste is processed until it reaches the standard for wastewater utilization in oil palm plantations, with pH 6-9 and BOD 5000 mg/l. POME is managed in accordance with applicable national regulations, according KepmenLH No.28 & 29 of 2003 regarding Technical Guidelines for Assessment of Wastewater Utilization from Palm Oil. Wastewater from the WWTP pond outlet is then pumped and used as a designated location for the use of waste water on the ground (Land Application) with 939.04 ha. This application dose covers the entire liquid waste generated by the factory, so there is no discharge of POME into water bodies

The company can show documents regarding the results of the measurement of the quality of POME, namely the POME Report per quarter and the RKL-RPL Implementation Report per semester which includes the results of the measurement of the quality of POME every month and land application monitoring well. The test is carried out by the KAN accredited laboratory. Based on the analysis of the test document, it shows that all the parameters tested are in accordance with the applicable quality standards (especially for pH and BOD) and for waste water utilization to be applied to land its does not cause pollution to the environment.

7.8.4

The certification unit already has a groundwater utilization permit based on the *Keputusan Menteri Pekerjaan Umum dan Perumahan Rakyat* No. 728/KPTS/M/2017 concerning Groundwater Concession Permit dated 15 September 2017 which is valid for 5 years from the date. It is explained in the permit that the maximum quota for water intake discharge is 26.71 liters/sec taken from 1 intake location at Pantun River, Suka Maju Village, Kongbeng District, Kutai Timur Regency, Kalimantan Timur

The water usage for FFB processing has been monitored and documented. The document of water usage in period of January – Juni 2022 shown that the water usage ratio in the range of 0.89 m³/ton of FFB, this range is still in accordance with the water quotas that can be utilized 1.43 m³/ton FFB. The unit certification also paid of water usage retribution every month for the entire scope of certification

From the results of management interviews and field observations by virtual to the Water Treatment Plan (WTP) it can be confirmed that the certification unit has replaced the water pipe leading to the reservoir, so that water can be used more efficiently. The flowmeter used is still functioning properly, and the officer responsible for WTP is very understanding about how the WTP works and recording flowmeter data. Officers can also show data in and out of water which is recorded every day.

Status: Comply

7.9

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

7.9.1

The unit of certification using of fossil fuels to increase the efficiency and to optimize monitored and renewable energy. This can be proven by recording documents on the application of the use of shells and fiber from the rest of the mill production process as renewable fuel for boiler purposes in 2021.

Based on the results of interviews and document verification, it shows that all solid waste in the form of shells and fiber is used to substitute diesel fuel, this utilized and the usage data recorded in detail and traceable. For example, the company shows data on the use of shells and fiber as a substitute for fossil fuels for the period 2021. From this data, it is known that the company has saved 86.14%, of diesel fuel, of the total diesel that should have been used as evidence of energy efficiency produced from use of renewable energy.

The company has also made efforts to improve the efficiency of the use of fossil fuels in the transportation area (use of vehicles), among others by carrying out regular maintenance to reduce incomplete combustion and analyzing fuel use by selecting efficient transportation routes.

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.

Certification Unit has been conducted source identification and GHG valuation by doing GHG inventory within the scope of Muara Wahau POM and its supplies based monitored through Palm GHG Calculator 4.0 and the summary result reported and accessible to public in RSPO website. The company has identified the significant GHG emissions, including: land used change, POME processing, used of fertilizers and pesticides, used of fossil fuels for operations and transportation.

Also made several mitigation plans to control the impact among GHG emission, such as: the right dose of fertilizer use and application as recommended, reduction of reuse and recycling actions, restrictions on electricity use, transportation and machine maintenance, and periodic air quality tests.

Reduction of fossil fuels at Muara Wahau POM has been implemented by using fiber and shells. The company also uses POME with test results from the monitoring, showing that all wastewater testing parameters have met the applicable quality standards. Based on the review of documents for example: monitoring of pesticide use, monitoring of diesel fuel, identification of HCVs and others it is found that accurate data have been entered into the RSPO palm oil GHG Calculator. GHG calculation using palm GHG Calculator 4.0. The summary of GHG emissions for the period January - December 2021, is listed as follows:

Summary Emissions

Description	Value	Unit	Description	Value	Unit
CPO	0.70	tCO ₂ e/tProduct	Oil palm planted on mineral soil	11051.31	Ha
PK	0.70	tCO ₂ e/tProduct	Oil palm planted area on peat	0.00	Ha
PKO	0.00	tCO ₂ e/tProduct	Total oil palm planted area	11051.31	Ha
PKE	0.00	tCO ₂ e/tProduct	Conservation area (Forested)	0.00	Ha
OER	21.25	%	Conservation area (non-Forested)	309.72	Ha
KER	5.48	%	FFB Production per hectare	29.90	t/ha

Mill Emissions and Credits & Emissions from Palm Kernel Crusher

Mill Emissions and Credits			Emissions from Palm Kernel Crusher	
Emission Source and Credits	tCO ₂	tCO ₂ e/t FFB	Emission Source	tCO ₂ e
POME	44155.36	0.20	PK from own mill	0.00
Fuel Consumption	053.08	0.00	PK from other sources	0.00
Grid Electricity Utilization	0.00	0.00	Fuel Consumption	0.00
Export of Excess Electricity to Housing & Grid	0.00	0.00	Total Crusher Emissions	0.00
Sale of PKS	0.00	0.00		
Sale of EFB	0.00	0.00		
Total	45108.44	0.20		

Estate / Plantation Field Emissions and Sinks

Description	Emission (tCO ₂ e)	TOTAL
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	Own	Group	3rd Party	
Emission Source				
Land Conversion	47080.96	536.32	0.00	47617.27
CO2 Emissions from Fertilizer	5274.68	84.04	0.00	5358.72
N2O Emissions from Peat	0.00	0.00	0.00	0.00
N2O Emissions from Fertilizer	5709.36	68.72	0.00	5778.08
Fuel Consumption	1433.01	0.02	0.00	1433.04
Peat Oxidation	0.00	0.00	0.00	0.00
Sinks				
Crop Sequestration	-61924.12	-705.40	0.00	-62629.52
Sequestration in Conservation Area	0.00	0.00	0.00	0.00
Total	-2426.11	-16.30	-790.05	-3232.46

Palm Oli Mill Effluent Treatment

POME Treatment	Unit	Value
POME Diverted to Compost	%	0
POME Diverted to anaerobic digestion	%	100
• POME to anaerobic pond	%	100
• POME to methane capture (flaring)	%	0
• POME to methane capture (electricity generation)	%	0

**POME is processed in WWTP*

There is an HCV area in Pantun Mas Estate covering an area of 56.64 Ha, so the area at Palm GHG is suitable.

7.10.2

Based on the results of the document review, it was found that there were no new plantings at unit certification, the planted activities had been carried out between 1990 to 2004. There is no new development areas since 2014. Thus, this indicator is not applicable.

7.10.3

The company has identified source of waste pollution and emissions from Estate and Mill activities for the period 2021. Sighted the result of identification of emissions and pollution as well as its sources, such as in estate emissions sources are from fossil fuel usage for transportation and generator, emission from fertilizer usage, pesticide usage and electricity usage. Identified the sources of emission and pollution from mill such as fossil fuel usage, electricity usage and WWTP. In addition, the company also conducts tests related to odour and vibration tests in work and residential areas.

Fossil fuel reducing have been implemented on Muara Wahau POM by fiber and shell usage. Realization of renewable energy have been monitored on monthly report for fiber and shell usage. Monitoring for emission and pollutants (air emission and air ambient) from Estate and Mill was done periodically and comply with the standards quality, it's covered on RKL/RPL implementation report and reported to Environmental Agency of Kutai Timur Regency. Therefore, it can conclude that the plans to reduce or minimize the pollutants are implemented and monitored well by management.

Status: Comply

7.11

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

7.11.1

Based on the results of the document review and interviews with the company's management, it is known that the company has a policy stated in the procedure document regarding land clearing without burning, through the Procedures in the Technical Guidelines for Land Preparation dan Land Fire Handling with No. SOP/NP/SMART/XI/L-H002 which was legalized on July 1, 2010 by the Division Head of SMARTRI.

This procedure includes efforts to identify, prevent and overcome the danger of land fires in the plantation area (reference: Technical guidelines for oil palm cultivation. Indonesian Government Regulation No. 4 of 2001 concerning "Control of Environmental Damage and/or

Pollution related to Forest and/or Land fires). The goal is to;

- Anticipating and handling land fires quickly and accurately.
- The basis for determining the system for handling and overcoming the danger of land fires.
- Formation of a land fire prevention and control team referring to the SOP for Handling Emergency Conditions.

Regarding procedures for handling work accidents and fire emergency response, the company also has SOP for Emergency Response No. SOP/SMART/GENERAL/SADV/II/005 was approved by the Head of Upstream on July 01, 2014, discussing the identified emergency response conditions including fires, land fires, explosions, pollution, natural disasters, riots, demonstrations, work accidents. Broadly speaking, the SOP contains the definition of an emergency and the emergency response team, the flow of reporting in the event of an emergency, the duties and responsibilities of the emergency response team, planning and handling actions in the event of an emergency, and recovery due to an emergency.

The certification unit did not clear new land after 2015, from interviews with management it was found that land clearing was done mechanically. From the results of the field visit in replanting area at the Muara Wahau Estate, no burnt areas were found.

7.11.2

The unit of certification has established fire prevention and control measures for the lands it manages directly by showing evidence that there are land fire prevention and control activities, which include;

- The existence of document procedure for land fire control No. SOP/SMART/UMUM/SADV/II/005
- There is a trained fire team, for example; *Struktur Organisasi Penanggulangan Kebakaran Hutan dan Lahan (KARHUTLA)* in document No. F/SMART/UMUM/SADV/005/001. The organizational structure of the firefighting team, with a total member of 65 people.
- Socialization of land fire prevention
- Conducting patrols/monitoring of fire-prone areas (hotspots)
- The company has carried out emergency and fire simulations, for example: emergency response, for example on 29 Mei 2021 attend by 32 people from organizational structure of the firefighting team.
- Monitoring of firefighting equipment on a monthly basis
- Monitoring of powder, foam and CO₂ fire extinguishers in the plantations and factories regularly every month, with the results of installation and inspection at locations that are ready for use.
- Monitoring of hydrant installations at with actual conditions (firefighting electrical panels, diesel pumps, starting engines, hydrant pillars and boxes, hydrant pipes)

The company can show a recording of the implementation of fire monitoring in the fire patrol monitoring form document in 2021. The results of the inspection of the document revealed that there were no fire incidents in the company's operational areas, this was reinforced by the results of interviews with the Kutai Timur Regency Agriculture Office that there were no fire incidents for two last year. In addition, as an effort to prevent fires, the unit of certification also puts up warnings related to fires, prohibits burning garbage and so on. And it's reported by PT SMART Tbk Land Fire Management Report document for the 2nd Semester which is submitted to the Minister of Agriculture of Kutai Timur Regency on 10 June 2022.

7.11.3

The unit certification also involves the community in monitoring fire prevention as a preventive and control measure, namely with the *Masyarakat Siaga Api (MSA)*, which examples are shown consist of 3 assisted villages, with 3 teams and 54 members and carry out fire prevention and control measures by conducting socialization of land fire prevention to the public around PT Kresna Duta Agroindo.

Fire Prevention and Fighting

Efforts made by the company to prevent, monitor, and manage fire incidents include:

- The existence of SOP for land fire control.
- Existence of a fire fighting team.
- Socialization of land fires to employees.
- Monitoring fire-prone areas on a regular basis. This is indicated by the existence of monitoring recordings with the hot spot system and immediately checking the hot spot points.

- Conducting a firefighting team simulation, for example a simulation of land and workplace fires that will be held on May 29, 2021.
- Routinely check fire fighting equipment on a monthly basis.

Status: Comply

7.12

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

7.12.1 & 7.12.8

GAR-SMART as the parent of PT Kresna Duta Agroindo has reported liability data and zero liability disclosure via email to RSPO on 29 August 2014. Based on this data, it is known that unit of certification has not cleared any new land since November 2005 without prior HCV identification activities.

The unit of certification did not carry out new clearing after November 2018. Based on document verification, it was found that the company did not clear land after November 2005. The study of the distribution of planting years revealed that oil palm plantations were carried out in 1998, 1999, 2000, and 2004.

7.12.2

The unit of certification has identified protected areas and high conservation value areas. The identification results are listed in the HCV Assessment PT Kresna Duta Agroindo (Muara Wahau Estate, Gunung Kombeng Estate, Gunung Kombeng Plasma, Rantau Panjang Estate, and Rantau Panjang Plasma) at Kuta Timur Regency, Kalimantan Timur Province in 2013, conducted by PT SMART Tbk's HCV Identification Team. The report explains that the total area of protected areas/HCV in the company area of Muara Wahau Estate and Gunung Kombeng Estate is 370.47 Ha. With HCV types 1.1 and 4.1 in the form of the Pantun River and Elang River, the details are as follows:

Area	(ha)
NKT 1.1; 4.1 Pantun River	211
NKT 1.1; 4.1 Elang River	159.47
Total	370.47

It is known that there is a reduction in the area of protected areas, with a total area of 370.47 ha located on the Pantun River border area of 211 ha and the Elang River border covering an area of 159.47 ha, to 253.08 ha as stated in the HCV Management and Monitoring Report of PT Kresna Duta Agroindo (Muara Wahau Estate, Gunung Kombeng Estate, and Gunung Kombeng Plasma) for the period 2021.

With a change in total area:

Area	(ha)
NKT 1.1; 4.1 Pantun River	211
NKT 1.1; 4.1 Elang River	42.08
Total	253.08

It was found that there was a difference in the area determined in 2012, with the current actual conditions (2021). These differences include the position of the river flow that is no longer suitable for the Elang River flow where some of the river boundaries are not natural water flows but that are designed for agronomic purposes in order to facilitate circulation. Unit of certification are encouraged to ensure that the determination of the HCV area is in accordance with the actual documented conditions. **OFI**

Based on interviews with management representatives it is known that the entire protected area belongs to the planted area. This is due to the identification of protected areas after oil palm planting has been carried out. In addition, based on field visits to protected areas, namely in Blocks C/D 12, C10, and C8 Division 4 Muara Wahau Estate (Elang River) and Blocks J16/17 and I22 Gunung Kombeng Estate (Pantun River Border) it is known that the border area has planted with oil palm. In addition, the company made efforts to check the river border areas by planting plants such as *Ulin*, *Guatemala* and *Meranti Putih*. All conservation areas owned by the company are in accordance with what is stated in the basic info.

7.12.3

Based on the notice on the RSPO website it is known that the High Forest Cover Landscapes and High Forest Cover Countries have not

been established by the RSPO. So that this standard has not yet been assessed.

7.12.4

The unit of certification has carried out activities in order to maintain protected areas and High Conservation Values which implemented in line according with the HCV management and monitoring plan period 2021, also reviewed periodically every 5 years involved consultation with relevant stakeholders such as villagers around.

- Primary and secondary animal monitoring
- Maintenance of protected animal warning boards
- Socialization to employees and the community around
- Maintenance of HCV boundary markers, attributes, and warning boards with a buffer zone/river border with a width of 50 m right and left along the river, as a spray boundary in the form of a cross
- Manual maintenance of *piringan* and *pasar pikul*.
- Rehabilitation of erosion prevention plants with vertifier grass, bamboo, and woody plants/animal feed
- Safeguarding and monitoring of HCV conditions every 3 months
- HCV rehabilitation monitoring
- Applying environmentally friendly cultivation methods (using slow release fertilizer, utilization of organic waste, application of IPM)

Based on interviews with management representatives it is known that the entire protected area belongs to the planted area. This is due to the identification of protected areas after oil palm planting has been carried out. In addition, based on field visits to protected areas, such as Blocks C/D 12, C10, and C8 Division 4 Muara Wahau Estate (Elang River) and Blocks J16/17 and I22 Gunung Kombeng Estate (Pantun River) it is known that the border area has planted with oil palm and the location of the protected area matches the map with the actual location in the field. In addition, the company made efforts to rehabilitation the river border areas by planting plants such as Ulin, Guatemala and Meranti Putih.

7.12.5

Based on the verification of the 2013 HCV identification document, it is known that the area identified as HCV is entirely within the company's HGU. No HCV areas have been identified as being on community-owned land.

In addition, the certification unit can show the minutes of the HCV management agreement between the company and the village of Kombeng Indah on April 4, 2020 where the agreement contains a joint agreement to participate in conserving the HCV area in the company's area. The agreement was agreed by both parties, represented by the Head of Kombeng Indah Village.

Based on the results of the document review and interview with management, it was found that there were no new clearing at unit certification since 15 November 2018. The study of the distribution of planting years revealed that oil palm plantations were carried out in 1998, 1999, 2000, and 2004.

7.12.6

Unit of Certification has a SOP for Management and Monitoring of High Conservation Values (Dok. No. SOP/SMART/BCOS-EHSD/SADV/I/002, dated July 1, 2014). The SOP aims to ensure that all management and monitoring activities of High Conservation Values also discuss the protection of rare and endangered wildlife. And the policy document for the Protection of Rare And Endangered Wildlife on June 25, 2015 which was legalized by the President Director of PT SMART Tbk. The protective measures set by the company are as follows:

- The company is committed to protecting and prohibiting the hunting of all types of wild animals that are included in the criteria for rare and endangered species that are in the plantation area
- The company will carry out continuous socialization and training activities on the protection of rare and endangered wild animals and their habitats to employees of contractor companies as well as to the community and other relevant stakeholders around the company.
- The company will investigate every case of violation and impose strict disciplinary sanctions (up to layoffs) to company employees who commit acts of hunting, maintaining, injuring, harming and killing endangered and endangered wildlife.
- For the handling of rare and endangered wildlife both inside and around its concession area, the company will cooperate with government agencies or related competent institutions
- The company is committed to evaluating and reporting on the company's performance based on this policy on a regular and open basis through the website and the company's annual sustainability report and continuously involving key stakeholders in the palm oil industry.

Based on *Laporan Identifikasi Kawasan Lindung* PT Kresna Duta Agroindo in 2021, the results of the identification of flora and fauna within the company's are, using the latest protection regulations, namely Permen LHK Number 106 of 2018 which are within the company's area, including:

- **Flora:** Consisting of 12 species of plants, with 3 types of them, such as: *Stenochlaena Palustris*, *Cyperus Rotundus*, and *Anggurung*
- **Fauna:** Consisting of 19 species of birds, 2 species of mammals, and 6 species of reptiles with 5 pisces, several of which are protected, such as; *Elanus Caeruleus*, *Acridotheres Javanicus*, *Macaca Fascularis*, and *Varanus Salavator*.

The certification unit has a flora and fauna identification document prior and monitoring program that is scheduled annually to update species data found in the company area using the latest protection regulations, namely Permen LHK Number 106 of 2018. This report is submitted to the institution that handles conservation and protection of plants and wild animals on a regular basis in *Laporan Pelaksanaan Pengelolaan dan Pemantauan Kawasan Bernilai Konservasi Tinggi* which including the results of species monitoring and observations on 07 June 2022.

Based on the results of interviews with representatives of the village community, it is known that the community understands the existence of the HCV area and the presence of flora and fauna in the company area. The village community understands that the company protects the HCV area also for flora & fauna, and is aware of the protected fauna species, prohibitions on hunting, logging and burning forests. Respondents added that in addition to direct socialization, the company also installed warning boards or signboards marking HCV areas as well as prohibitions on environmental destruction which were an indirect form of socialization. Based on this explanation, it can be concluded that the company already has a plan and evidence of the implementation of socialization and is known by the surrounding community.

7.12.7

Unit of certification can show records of HCV management carried out in the period 2022. The results of the monitoring are used for follow-up improvements to the management plan, for example:

- Record of HCV Patrol Report with document No. F/SMART/BCOS-EHSD/SADV/002/014
- Record of HCV Attribute Monitoring Report (sign board, spray limit sign, HCV stake) with document No. F/SMART/BCOS-EHSD/SADV/002/019
- Records of Maintenance for the Rehabilitation of HCV Areas for *vertifier grass*, *Tanjung*, *Mahoni* and *Ketapang* with document No.F/SMART/BCOS-EHSD/SADV/002/013
- Monitoring Records of Animal and Plant Species (primer and secondary) with document No.F/SMART/BCOS-EHSD/SADV/002/021

The certification unit has a continuous action to improve the management plan resulting from the report on Identification of High Conservation Values (HCV) document as an effort to improve the quality of HCV management and monitoring activities in accordance with the recommendations, including by:

- Make documentation of each management and monitoring activity as evidence of activities and complement the reporting file.
- Conduct more intense monitoring of species from the class of mammals, reptiles and amphibians so as to allow for additional species.
- Repair damaged attributes in accordance with the existing management plan, because some attribute locations have started to break down.
- For invasive species (leguminous plants) in the HCV area there must be a report on the exotic plant inventory, accompanied by documentation. If there are no exotic plants in the HCV area, an inventory report must still be made.
- Provide socialization and direct monitoring of replanting activities in blocks where rivers are included in HCVs

The HCV management activities that taken by the company has been implemented describe in HCV management & monitoring plan period 2021 consist of maintaining maintaining HCV attributes, socialization regular patrols, species monitoring, and enrichment in riparian. HCV monitoring is periodically evaluated by unit of certification every 5 years and is used as a reference as a management plan for HCV management. The management plan is implemented effectively based on the results of monitoring from the previous period.

Status: Comply

3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and logo from Certification Body which submitted by Client	X or√
ASA-1.3	Parent Company: Golden Agri Resources Ltd Trademark License Number RSPO-1-0096-11-100-00	✓
	Status: Comply	
2.	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use	X or√
ASA-1.3	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use. Parent Company: Golden Agri Resources Ltd Trademark License Number RSPO-1-0096-11-100-00	✓
	Status: Comply	
3.	Implementation of Certificate and Logo is not used on product	X or√
ASA-1.3	Implementation of Certificate and Logo is not used on product.	✓
	Status: Comply	
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or√
ASA-1.3	Parent Company: Golden Agri Resources Ltd Trademark License Number RSPO-1-0096-11-100-00. Controlling of Certificate and Logo, including withdrawing inappropriate logo.	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

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

Golden Agri-Resources, Ltd Time Bound Plan (TBP) is explained in table 1.5. Golden Agri-Resources run forty nine (49) mills and one hundred and eighty (180) estates (own and smallholders) in Indonesia and has achieved RSPO certified for thirty-one (31) mills and supply base in Indonesia. Golden Agri-Resources, Ltd has informed the TBP progress, MUTU has considered that Golden Agri-Resources, Ltd is comply with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Golden Agri-Resources, Ltd on 14 June 2022 made by Head of Operations Sustainability.

MUTU has verified partial certification for uncertified unit's subsidiary of Golden Agri-Resources, Ltd based on their Time Bound Plan. There are eighteen (18) uncertified management unit of GAR. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company Group/Holding Statement:</p> <p>The company has carried out a Compliance Audit / Internal Compliance Verification (ICV) to see compliance with RSPO standards and also the Set-up System in the Company's units to be certified.</p> <p>There are Compliance Audit (ICV) reports for each company including:</p> <ol style="list-style-type: none"> 1. PT Sawitakarya Manunggul – Sawita Mill: Pre-Audit 2015, Compliance Audit 24 - 31 May 2021 2. PT Smart Tbk – Bukit Kapur Mill: Pre-Audit 2015, Compliance Audit 15 November 2021 3. PT Sinar Kencana Inti Perkasa – Kasuari Mill: Pre-Audit 2015, Compliance Audit 11 October 2021 4. PT Agrolestari Mandiri – Pekawai Mill: Pre-Audit 2015, Compliance Audit 01 March 2021 5. PT Binasawit Abadi Pratama – Perdana Mill: 14 June 2021 6. PT Agrokarya Prima Lestari – Kuayan Mill: Pre-Audit 2014, Compliance Audit 13 September 2021

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>7. PT Mitrakarya Agroindo – Tangar Mill: Pre-Audit 2015, Compliance Audit 27 September 2021</p> <p>8. PT Paramita Internusa Pratama – Belian Mill: Pre-Audit 2015, Compliance Audit 28 June 2021</p> <p>9. PT Kresna Duta Agroindo – Rantau Panjang Mill: Compliance Audit 01 November 2021</p> <p>10. PT Kresna Duta Agroindo – Gunung Kombeng Mill: Compliance Audit 15 February 2021</p> <p>11. PT Sawit Mas Sejahtera – Sungai Kikim Mill: <i>Setup System</i>. Compliance Audit 20 September 2021</p> <p>12. Sinar Kencana Inti Perkasa – Sungai Magalau Mill: Compliance Audit 25 October 2021.</p> <p>13. PT Bahana Karya Semesta – Sungai Air Jernih Mill: Compliance Audit 6 December 2021</p> <p>14. PT Bangun Nusa Mandiri – Kenari Mill: Compliance Audit 4 October 2021.</p> <p>15. PT Agrolestari Sentosa – Jalemo Mill: Compliance Audit 11 October 2021</p> <p>16. PT Adi Tunggal Mahajaya – Sako Mill: Compliance Audit 8 November 2021.</p> <p>Auditor Verification: Internal Audit report available for uncertified management unit:</p> <p>1. PT Sawitakarya Manunggul (Sawita Mill and supply base) compliance audit on 24 - 31 May 2021.</p> <p>2. PT SMART (Bukit Kapur Mill and supply base) compliance audit on 15 November 2021.</p> <p>3. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base) compliance audit on 11 October 2021.</p> <p>4. PT Agrolestari Mandiri (Pekawai Mill and supply base) compliance audit on 01 March 2021.</p> <p>5. PT Binawit Abadi Pratama (Perdana Mill and supply base) compliance audit on 14 June 2021.</p> <p>6. PT Agrokarya Prima Lestari (Kuayan Mill and supply base) compliance audit on 13 September 2021.</p> <p>7. PT Mitra Karya Agroindo (Tangar Mill and supply base) compliance audit on 27 September 2021.</p> <p>8. PT Paramitra Internusa Pratama (Belian Mill and supply base) compliance audit on 28 June 2021.</p> <p>9. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base) compliance audit on 01 November 2021.</p> <p>10. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base) compliance audit on 15 February 2021.</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>11. PT Sawit Mas Sejahtera (Sungai Kikim and supply base) compliance audit on 20 September 2021.</p> <p>12. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base) compliance audit on 25 October 2021.</p> <p>13. PT Bahana Karya Semesta (Sungai Air Jernih Mill and supply base) compliance audit on 6 December 2021.</p> <p>14. PT Bangun Nusa Mandiri (Kenari Mill and supply base) compliance audit on 4 October 2021.</p> <p>15. PT Agro Lestari Sentosa (Jalemo Mill and supply base) compliance audit on 11 October 2021.</p> <p>16. PT Adi Tunggal Mahajaya (Sako Mill and supply base) compliance audit on 8 November 2021.</p> <p>Then there will be additional units in 2022 with the acquisition by GAR of 2 mills and 16 Estates (11 own estates and 5 estate plasma/KKPA). Internal audit activities have not yet been carried out, but prior to the acquisition of these units, GAR has carried out a due diligence or internal assessment so that it can be decided to be acquired by GAR and the internal audit plan to be carried out on these units can be shown, with details as follows:</p> <ol style="list-style-type: none"> 1. PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA with an internal audit plan on 17 May 2022. 2. PT Harapan Rimba Raya: Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA with an internal audit plan on 17 May 2022. 3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA with an internal audit plan on 17 May 2022. 4. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be the supply base of Bukit Perak Mill (PT Bumi Permai Lestari) that has been certified with an internal audit plan on 28 March 2022. 5. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be the supply base of Bukit Perak Mill (PT Bumi Permai Lestari) that has been certified with an internal audit plan on 28 March 2022. 6. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be the supply base of Bumipalma Mill (PT Bumipalma LestariPersada) that has been certified with an internal audit plan on 8 August 2022.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>7. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be the supply base of Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa) with an internal audit plan on 7 November 2022.</p> <p><i>Notes:</i> Verification of the realization of the internal audit carried out on the newly acquired units will be carried out at the nearest RSPO surveillance audit activity with the internal audit schedule that has been set.</p>
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.12	<p>Company Group/Holding Statement: Several companies under GAR were planted above November 2005, while the HCV assessment process was conducted in the period 2010 – 2013.</p> <p>GAR and its subsidiaries carried out a Remediation and Compensation (RaCP) procedure beginning with Disclosure and Zero Liability reporting to the RSPO via email on 29 August 2014.</p> <p>From 25 companies, 7 of them are certified units, the remaining 18 companies are uncertified units. The following is an update on the RaCP progress as of 11 January 2022 for uncertified units:</p> <p>a) 4 companies have received Concept Note approval from RSPO dated 27 July 2020, namely:</p> <ol style="list-style-type: none"> 1. PT Kencana Graha Permai (Delima Estate) – Kalimantan Barat 2. PT Agrolestari Sentosa – Kalimantan Tengah 3. PT Sumber Indah Perkasa – Papua 4. PT Kresna Duta Agroindo – Kalimantan Timur <p>The company submitted a new Concept Note in collaboration with a third party (PT Lestari Capital). Concept Note Batch 1 includes companies:</p> <ol style="list-style-type: none"> 1. PT Kencana Graha Permai (Delima Estate) – Kalimantan Barat 2. PT Sumber Indah Perkasa – Papua 3. PT Kresna Duta Agroindo – Kalimantan Timur <p>The latest progress on the revised Concept Note was submitted on 14 January 2022 and is currently still being reviewed by the RSPO Compensation Panel.</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>The company also made the Concept Note Project Batu Menangis for PT Agrolestari Sentosa – Kalimantan Tengah, was submitted on 16 December 2021 to RSPO Compensation Panel.</p> <p>b) The LUCA (Land Use Change Analysis) report which is still in the RSPO review process:</p> <ol style="list-style-type: none"> 1. PT Kartika Prima Cipta – Kalimantan Barat 2. PT Agrolestari Mandiri – Kalimantan Barat <p>c) The LUCA (Land Use Change Analysis) report is in the process of being revised and will be sent to the RSPO:</p> <ol style="list-style-type: none"> 1. PT Cahaya Nusa Gemilang – Kalimantan Barat 2. PT Paramitra Internusa Pratama – Kalimantan Barat 3. PT Bangun Nusa Mandiri – Kalimantan Barat 4. PT Persada Graha Mandiri – Kalimantan Barat 5. PT Satya Kisma Usaha (Medan Sari Estate) – Kalimantan Tengah 6. PT Binasawit Abadi Pratama – Kalimantan Tengah 7. PT Aditunggal Mahajaya – Kalimantan Tengah 8. PT Mitrakarya Agroindo – Kalimantan Tengah 9. PT Agrokarya Primalestari – Kalimantan Tengah 10. PT Buana Adhitama – Kalimantan Tengah 11. PT Sinar Kencana Inti Perkasa – Kalimantan Selatan 12. PT Sawita Karya Manunggul – Kalimantan Selatan <p>d) The LUCA (Land Use Change Analysis) report has been approved is PT Satya Kisma Usaha (Batang Gading Estate) – Jambi.</p> <p>The LUCA report proposed to be hold/postponed until the Integrated HCV HCS Report obtains Satisfactory status from the HCVRN, is PT Sawit Mas Sejahtera – Sumatera Selatan (2 reports).</p> <p>HCV assessments for 17 reports was conducted in the period of 2010 to 2018 by external (consultant) and internal parties. The HCV assessment is carried out by a team assessor with a Team Leader who has been approved by the RSPO. The reference for the HCV assessment using the HCV Toolkit 2008. The peer review is carried out by an independent consultant who has also been approved by the RSPO.</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Assessment of PT Sawit Mas Sejahtera – Sumatera Selatan has used Integrated HCV-HCS with the consultants who have been licensed in HCVN and HCSA</p> <p>The company continues to follow up on the RaCP process, so that the RSPO timebound for uncertified units can be realized immediately.</p> <p>In the 2021 period, several companies were acquired by GAR according to the notarial deed of amendment dated 04 August 2021, including:</p> <ol style="list-style-type: none"> 1. PT Kruing Lestari Jaya 2. PT Harapan Rimba Raya 3. PT Rimbaraya Tamajaya 4. PT Agrolestari Subur Sejahtera 5. PT Agrolestari Hijau Sentosa 6. PT Kharisma Riau Sentosa Prima 7. PT Mitranusa Permata <p>The company is still collecting information and documentation regarding the fulfillment of RaCP obligations for the newly acquired company. The timeline that has been prepared for the fulfillment of this RaCP is:</p> <ul style="list-style-type: none"> • Submission of Disclosure and LUCA on semester 1 of 2022 • Submission of Concept Notes on Semester 2 of 2022 • Approval RaCP Proposal on Semester 1 of 2023 <p>For the RaCP process, smallholders scheme will be adjusted to the 2023 timebound along with the new acquisition company.</p> <p>Auditor Verification:</p> <p>Based on auditor verification, not all uncertified unit conduct new clearing after Nov 2005, but for uncertified unit with land clearing after Nov 2005 has follow RaCP. Detail information of uncertified unit are:</p> <ol style="list-style-type: none"> 1. PT Kencana Graha Permai - Kalimantan Barat (Delima Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted a new Concept Note in collaboration with PT Lestari Capital on 14 January 2022, and is currently still being reviewed by the RSPO Compensation Panel.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ol style="list-style-type: none"> 2. PT Agrolestari Sentosa – Kalimantan Tengah (Jalemo Estate, Manuhing Estate, Kajui Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted the Concept Note Project Batu Menangis on 14 January 2022 and is currently still being reviewed by the RSPO Compensation Panel. 3. PT Sumber Indah Perkasa – Papua (Mambuk Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted a new Concept Note in collaboration with PT Lestari Capital on 14 January 2022, and is currently still being reviewed by the RSPO Compensation Panel. 4. PT Kresna Duta Agroindo – Kalimantan Timur (Gunung Kombeng Mill, Rantau Panjang Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted a new Concept Note in collaboration with PT Lestari Capital on 14 January 2022, and is currently still being reviewed by the RSPO Compensation Panel. 5. PT Kartika Prima Cipta – Kalimantan Barat (Muara Tawang Estate), the LUCA report which is still in the RSPO review process. 6. PT Agrolestari Mandiri – Kalimantan Barat (Pekawai Mill and supply bases), the LUCA report which is still in the RSPO review process. 7. PT Cahaya Nusa Gemilang – Kalimantan Barat (Kenanga Estate), LUCA report is in the process of being revised and will be sent to the RSPO. 8. PT Paramitra Internusa Pratama – Kalimantan Barat (Belian Mill, Belian Estate and Tengawang Estate), LUCA report is in the process of being revised and will be sent to the RSPO. 9. PT Bangun Nusa Mandiri – Kalimantan Barat (Kenari Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO. 10. PT Persada Graha Mandiri – Kalimantan Barat (Kapuas Hulu Estate and Sungai Beran Estate), LUCA report is in the process of being revised and will be sent to the RSPO. 11. PT Satya Kisma Usaha – Kalimantan Tengah (Medan Sari Estate), LUCA report is in the process of being revised and will be sent to the RSPO. 12. PT Binasawit Abadi Pratama – Kalimantan Tengah (Perdana Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>13. PT Aditungal Mahajaya – Kalimantan Tengah (Sungai Ayawan Estate), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>14. PT Mitrakarya Agroindo – Kalimantan Tengah (Tangar Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>15. PT Agrokarya Primalestari – Kalimantan Tengah (Kuayan Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>16. PT Buana Adhitama – Kalimantan Tengah (Sajiri Estate and Bukit Dua Estate), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>17. PT Sinar Kencana Inti Perkasa – Kalimantan Selatan (Sungai Magalau Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>18. PT Sawita Karya Manunggul – Kalimantan Selatan (Sawita Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>19. PT Satya Kisma Usaha – Jambi (Batang Gading Estate), the LUCA report has been approved in 12 November 2021.</p> <p>20. PT Sawit Mas Sejahtera – Sumatera Selatan, the LUCA report proposed to be hold/postponed until the Integrated HCV HCS Report obtains Satisfactory status from the HCVRN.</p> <p>21. The companies were acquired by GAR on 2021 are PT Kruing Lestari Jaya (Sungai Perak Mill and supply bases), PT Harapan Rimba Raya (Sungai Kedang Mill and supply bases), PT Rimbaraya Tamajaya (Sungai Pahu Estate), PT Agrolestari Subur Sejahtera (Bukit Permai Estate), PT Agrolestari Hijau Sentosa (Bukit Lestari Estate), PT Kharisma Riau Sentosa Prima (Kharisma Estate), PT Mitranusa Permata (Sungai Manunggul Estate). The company is still collecting information and documentation regarding the fulfillment of RaCP obligations.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement:</p> <p>GAR and its subsidiaries planted after January 2010. There are companies that had conducted the RSPO New Planting Procedure (NPP) and have gone through a 30-day public consultation process in April 2014. These companies include:</p> <ol style="list-style-type: none"> 1. PT Satya Kisma Usaha – Jambi 2. PT Kresna Duta Agroindo – Kalimantan Timur

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ol style="list-style-type: none"> 3. PT Mitra Karya Agroindo – Kalimantan Tengah 4. PT Binasawit Abadipratama – Kalimantan Tengah 5. PT Aditunggal Mahajaya – Kalimantan Tengah 6. PT Agrolestari Sentosa – Kalimantan Tengah 7. PT Agrokarya Primalestari – Kalimantan Tengah 8. PT Buana Adhitama – Kalimantan Tengah 9. PT Agrolestari Mandiri – Kalimantan Barat 10. PT Paramitra Internusa Persada – Kalimantan Barat 11. PT Persada Graha Mandiri – Kalimantan Barat 12. PT Bangun Nusa Mandiri – Kalimantan Barat 13. PT Kartika Prima Cipta – Kalimantan Barat 14. PT Kencana Graha Permai – Kalimantan Barat 15. PT Cahaya Nusagemilang – Kalimantan Barat <p><i>Auditor Verification:</i> Based on auditor verification, not all uncertified unit conduct new clearing after January 2010 but for all uncertified unit with land clearing after January 2010 has follow NPP. Detail information of uncertified unit are:</p> <ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base): there is no new land clearing after January 2010 2. PT Agrolestari Mandiri (Pekawai Mill and supply base): NPP on 26 April 2014 3. PT Binasawit Abadi Pratama (Perdana Mill and supply base): NPP on 8 July 2014 4. PT Agrokarya Prima Lestari (Kuayan Mill and supply base): NPP on 26 April 2014 and PT Buana Adhitama (supply base) conduct NPP on 4 June 2014. 5. PT Mitra Karya Agroindo (Tangar Mill and supply base): NPP on 26 April 2014 6. PT Paramitra Internusa Pratama (Belian Mill and supply base): NPP on 3 June 2014, PT Kartika Prima Cipta (supply base) conduct NPP on 8 July 2014 and PT Persada Graha Mandiri (Supply base) conduct NPP on 6 June 2014. 7. PT Sawit Mas Sejahtera (Sungai Kikim and supply base): there is new planting after January 2010 in Sungai Kikim Estate and Sungai Saling Estate, the company not conduct NPP. This is become subject of sanction. For PT Buana Sawit Mas (supply base) conduct NPP on 8 July 2014. 8. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base): there is no new land clearing after January 2010.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>9. PT Agro Lestari Sentosa (Jalemo Mill and supply base): NPP on 26 April 2014</p> <p>10. PT Adi Tunggal Mahajaya (Sako Mill) (under construction): NPP on 25 April 2014, PT Agrokarya Prima Lestari (supply base) conduct NPP on 26 April 2014 and PT Mitra Karya Agroindo (supply base) conduct NPP on 26 April 2014.</p> <p>11. PT SMART (Bukit Kapur Mill and supply base): there is no new land clearing after January 2010.</p> <p>12. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base): NPP on 8 July 2014.</p> <p>13. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base): NPP on 8 July 2014.</p> <p>14. PT Sawitakarya Manunggul (Sawita Mill and supply base): there is new land clearing after January 2010 in Sawita KKPA and company not conduct NPP. This is become subject of sanction.</p>
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8	<p>Company Group/Holding Statement:</p> <p>No land conflicts. The company has a land conflict resolution mechanism in accordance with the RSPO criteria 4.2, 4.6, 4.7 and 4.8. This procedure is contained in the SOP for handling social conflicts with the registration number SOP/SMART/SCRD/NSDV//002 revision 1 dated 18 May 2016 and SOP for Handling Complaints and Dissatisfaction no SOP/SMART/GIMSSCMD/USDV//001 revision 2 dates April 11, 2017. This procedure regulates mutually agreed upon social conflict resolution. Conflict resolution can be done in a participatory manner and can also be done with a third party (mediator).</p> <p>The company also has a procedure for handling complaints before they develop into conflict. The process in question is SOP/SMART/GIMS-SCMD/USDV//001 revision 2 dated 11 April 2017, handling complaints appropriately and quickly. GAR has initiated to become a member of the RSPO DSF as a "Grower" category.</p> <p>Here recap of complaint progress related to GAR which publish in RSPO Website:</p> <ol style="list-style-type: none"> 1. Complaint dated July 11, 2021 to PT SMART Tbk (West Kalimantan Region) regarding the alleged purchase/supply of fresh fruit bunches (FFB) and crude palm oil (CPO) from PT Kapuasindo Palm Industri (PT

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>KPI), a subsidiary of the Kencana Group (not members of the RSPO), who have committed a series of violations against workers and indigenous peoples in the district. Last Status RSPO Complaints Panel has issued a decision letter regarding the complaint on 17 January 2022 in which it was decided to terminate the entire complaint. The decision letter has been submitted to both parties, and time is given if anyone wishes to appeal until April 11, 2022. (RSPO Complaint Panel Decision is attached).</p> <p>2. Complaint on 2 March 2020 to GAR (Central Kalimantan Region) from Forest Peoples Program & Elk Hills Research regarding alleged land legality and bribery cases. On the part of GAR itself, GIS-2 analysis for land clearance alerts after November 2014 from discussions with RSPO GIS manager on 21 May 2021 has agreed on the sampling method. GAR's clarification report was sent on September 8, 2021. As for the legal review on anti-bribery policies & practices, the company rejected the ToR for Legal Review on March 26, 2021. Until now the company is still waiting for a further decision from the RSPO. The latest status is as of December 15, 2021, the RSPO is waiting for the results of a review from the consultant.</p> <p>3. Complaint on 19 October 2018 to GAR (Kapuas Hulu Region, West Kalimantan) from the Forest Peoples Program (FPP) & Transformasi Untuk Keadilan – Indonesia (TUK-I) regarding legality. On 26 August 2021, the RSPO Complaint Panel decided to proceed with further investigations. The investigation carried out will be fully funded by the RSPO, and carried out by PROFUNDO Parties. Until now the company is still waiting for a further decision from the RSPO. The latest status is as of December 6, 2021, the RSPO is waiting for the results of a review from the consultant.</p> <p>4. Complaint on 13 October 2014 to PT Kartika Prima Cipta (West Kalimantan) from Forest Peoples Program (FPP) & Transformasi Untuk Keadilan – Indonesia (TUK-I) regarding the FPIC process and 6 other issues. RSPO with the approval of GAR and FPP divides the conflict resolution verification process into 5 phases (phase 1 related to NPP, maximum land holding and new land development, phase 2 related to legality, phase 3 related to smallholders, phase 4 related to FPIC and phase 5</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>related to HCV), where GAR has responded to phase 5 on 26 August 2021. The information submitted has responded to all stages and GAR is currently waiting for a decision from the RSPO Complaint Panel. The latest status as of 15 December 2021, the RSPO Complaint Panel has reached a decision for phase 2 and is awaiting discussion of phases 3 and 4.</p> <p>5. The results of the Compliance Audit conducted for the 2021 period in the uncertified unit that there was no land conflict and the unit had disseminated the SOP for Handling Complaints and Dissatisfaction, Human Rights Policy and SOP for Handling Social Conflicts both internally and externally, in general the FPIC process has been carried out according to procedures, so that there are no land or social conflicts.</p> <p><i>Auditor Verification:</i> Auditor has verified the supporting evidence of above the company statement. There is no land conflicts in the following uncertified management unit:</p> <ol style="list-style-type: none"> 1. PT Sawitakarya Manunggul (Sawita Mill and supply base) 2. PT SMART (Bukit Kapur Mill and supply base) 3. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base) 4. PT Agrolestari Mandiri (Pekawai Mill and supply base) 5. PT Binawit Abadi Pratama (Perdana Mill and supply base) 6. PT Agrokarya Prima Lestari (Kuayan Mill and supply base) 7. PT Mitra Karya Agroindo (Tangar Mill and supply base). 8. PT Paramitra Internusa Pratama (Belian Mill and supply base) 9. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base). 10. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base). 11. PT Sawit Mas Sejahtera (Sungai Kikim and supply base) 12. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base) 13. PT Bahana Karya Semesta (Sungai Air Jernih Mill and supply base) 14. PT Bangun Nusa Mandiri (Kenari Mill and supply base) 15. PT Agro Lestari Sentosa (Jalemo Mill and supply base) 16. PT Adi Tunggal Mahajaya (Sako Mill and supply base)

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>17. PT Kruing Lestari Jaya (Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA)</p> <p>18. PT Harapan Rimba Raya (Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA).</p> <p>19. PT Rimbaraya Tamajaya (Sungai Pahu Estate and Sungai Pahu KKPA), which will be supply base for Sungai Kedang Mill.</p> <p>20. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be the supply base of Bukit Perak Mill that has been certified</p> <p>21. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be the supply base of Bukit Perak Mill that has been certified</p> <p>22. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be the supply base of Bumipalma Mill that has been certified</p> <p>23. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be the supply base of Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa).</p> <p>Based on the auditor's search through news from the internet, no information on land conflicts was found in the above uncertified management unit. However, on the RSPO website (Complaint Panel) there is information about complaints from various stakeholders against GAR and this has been explained by the company regarding the progress of the settlement as described above.</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 4.2	<p>Company Group/Holding Statement:</p> <p>The company has a procedure for handling employee complaints before becoming into conflicts. The procedure is SOP/SMART/SCRD/NSDV/II/002 revision 1 dated 18 May 2016.</p> <p>Procedures related to employee complaints are regulated in the internal flow of form because employees are included in the category of internal stakeholders. The media of complaint used is an official letter submitted through the worker union or put in the suggestion box provided in strategic locations.</p> <p>During 2021, there were no new complaints regarding employment through the RSPO website, as for the progress of</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>previous complaints, they have closed status.</p> <p><i>Auditor Verification:</i></p> <p>There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>There is no list of employee and stakeholder complaint and grievance.</p>
2.1.6	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1	<p><i>Company Group/Holding Statement:</i></p> <p>Companies comply with the regulations in accordance with the requirements of the RSPO 2.1 where there is no violation of the rules that are relevant to the plantation. The company has a mechanism to evaluate compliance with regulations, namely SOP/SMART/UMUM/SADV//002. In SOP describes procedures for compliance, completeness and groove sections which explain in detail to evaluate compliance with the legislation.</p> <p>Subsidiaries of GAR which still on going to process HGU consist of:</p> <ol style="list-style-type: none"> 1. PT Djuandasawit Lestari (Muara Kandis Estate & Muara Tawas Estate) 2. PT Sawit Mas Sejahtera (Sawit Mas Estate) 3. PT Bumi Sawit Permai (Bumi Sawit Estate) 4. PT Forestralestari Dwikarya (Tanjung Rusa Estate) 5. PT Sumber Indah Perkasa (Ujung Tanjung Estate, Sungai Merah Estate) 6. PT Ivo Mas Tunggal (Samsam Estate, Ujung Tanjung Estate, Sei Rokan Estate, Nenggala Estate) 7. PT Buana Wiralestari Mas (Kijang Estate, Nagamas Estate, Nagasakti Estate) 8. PT Ramajaya Pramukti (Ramarama Estate) 9. PT Binasawit Abadipratama (Perdana Estate, Lenggana Estate, Semandau Estate, Muara Dua Estate) 10. PT Agrokarya Prima Lestari (Muara Tawang Estate, Kuayan Estate, Bukit Sentuhai Estate, Tajur Beras Estate, Seranau Estate) 11. PT Buana Adhitama (Sapiri Estate) 12. PT Agrolestari Sentosa (Manuhing Estate, Kajui Estate) 13. PT Mitra Karya Agroindo (Sungai Nusa Estate) 14. PT Aditunggal Mahajaya (Sungai Ayawan Estate) 15. PT Satya Kisma Usaha (Medang Sari Estate) 16. PT Buana Adhitama (Bukit Dua Estate)

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

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Sawit Permai. The legal non compliance which still on process is EIA revision.</p> <ul style="list-style-type: none"> - PT Agrolestari Sentosa (Jalemo Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Adi Tunggal Mahajaya (Sako Mill and supply base), there is a legal non-compliance. Supply base for Sako Mill is PT Adi Tunggal Mahajaya, PT Mitra Karya Agroindo and PT Agrokarya Prima Lestari. The legal non compliance which still on process is Land Use Title (HGU). - PT SMART Tbk (Bukit Kapur Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base, doesn't have land use title (SHM), the SHM is still on process. Supply base for Gunung Kombeng Mill is community's plantation. - PT Bangun Nusa Mandiri (Kenari Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Djuanda Sawit Lestari: there is an area is still in process for HGU in Muara Wahau Estate (574.58 Ha) - PT Satya Kisma Usaha – Kalimantan Tengah: there is an area is still in process for HGU in Medang Sari Estate (24,41 Ha) - PT Sawit Mas Sejahtera: there is an area is still in process for HGU in Sawit Mas Sejahtera Estate (2,291 Ha) - PT Bumi Sawit Mas: there is an area is still in process for HGU in Bumi Sawit Mas Estate (773 Ha) - PT Sumber Indah Perkasa: there is an area is still in process for HGU in Ujung Tanjung Estate (155.46 Ha) and Sungai Merah Estate (241.54 Ha) - PT Ivo Mas Tunggal: there is an area still in process for HGU Samsam Estate (29.09 Ha), Kandista Estate (158.46 Ha), Nenggala Estate (419.9 Ha), Sei Rokan Estate (102.7 Ha), Ujung Tanjung Estate (557.3 Ha) - PT Buana Wiralestari Mas: there is area is still in process for HGU Naga Mas Estate (253.39 Ha), Naga Sakti Estate (59.79 Ha), Kijang Mas Estate (56.07 Ha) - PT Ramajaya Pramukti: there is an area still in process for HGU Rama Rama Estate (318.76 Ha)

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>- PT Bumipalma Lestari Persada: there is an area still in process for HGU Bumi Palma Estate (39.21 Ha)</p> <p>Then there will be additional units in 2022 with the acquisition by GAR of 2 mills and 16 Estates (11 own estates and 5 estate plasma/KKPA). Internal audit activities have not yet been carried out, but prior to the acquisition of these units, GAR has carried out a due diligence or internal assessment so that it can be decided to be acquired by GAR, with details as follows:</p> <ol style="list-style-type: none"> 1. PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA. 2. PT Harapan Rimba Raya: Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA. 3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA which will be supply base for Sungai Kedang Mill (PT Harapan Rimba Raya). 4. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified. 5. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified. 6. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be supply base for Bumipalma Mill (PT Bumipalma Lestari Persada) which has been certified. 7. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be supply base for Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa). <p>The acquisition company already has legality in the form of HGU, but other legalities such as environmental documents and other permits are being collected and will be completed when an internal audit of the acquisition units is carried out.</p> <p>There are 4 companies which still on process to revise EIA document and temporary storage place for hazardous and toxic waste, consist of:</p> <ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa (Kasuari Mill, Cendrawasih Estate, Nuri Estate, Rajawali Estate) 2. PT Sumber Indah Perkasa (Mambruk Estate)

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>3. PT Sawit Mas Sejahtera (Sungai Kikim Mill, Sungai Kikim Estate, Sungai Pangi Estate, Sungai Musi Estate, Sungai Saling Estate)</p> <p>4. PT Bumi Sawit Permai (Sungai Enim Estate, Sungai Lematang Estate)</p> <p>There are some unit still on process the land certificate (SHM) consist of:</p> <ol style="list-style-type: none"> 1. PT Kresna Duta Agroindo – Gunung Kombeng Mill (Gunung Kombeng Plasma) 2. PT Ramajaya Pramukti (Ramarama Plasma) 3. PT Satya Kisma Usaha – Sungai Bengkal Mill (Kilis Plasma) 4. PT Agrokarya Prima Lestari (Sungai Sambon Plasma) 5. PT Djundasawit Lestari (Pandawa Plasma) 6. PT Foresta Lestari Dwikarya (Tanjung Rusa Plasma) 7. PT Palmindo Biliton Berjaya (Tanjung Sawit Plasma) 8. PT Sinar Kencana Inti Perkasa (Sungai Kupang Plasma) 9. PT Sawitakarya Manunggul (Sawita Plasma) 10. PT Kresna Duta Agroindo (Jakluay Plasma, Bukit Subur Plasma) 11. PT Kresna Duta Agroindo (Rantau Panjang Plasma) 12. PT Kencana Graha Permai (Kayung Plasma, Kencana Plasma, Kenanga Plasma) 13. PT Paramitra Internusa Pratama (Belian Plasma) 14. PT Paramitra Internusa Pratama (Muara Tawang KKPA) 15. PT Paramitra Internusa Pratama (Kapuas Hulu KKPA) 16. PT Mitrakarya Agroindo (Sulin Plasma) 17. PT Agrokarya Prima Lestari (Sapiri Plasma) 18. PT Adi Tunggal Mahajaya (Sako Plasma) 19. PT Kresna Duta Agroindo – Pelakar Mill (Tiga Serumpun Plasma) 20. PT Kresna Duta Agroindo – Langling Mill (Batang Gading Plasma) <p>Based on auditor verification, there is still progress in obtaining legality documents for the uncertified units so that GAR has included the certification plan for the uncertified units in the timebound plan.</p>

3.4 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-1.1 + ASA-1.2

NCR No.	:		Issued by	:	
Date Issued	:		Time Limit	:	
NC Grade	:		Date of Closing	:	
Standard Ref. & Requirement	:				
Evidence observed (filled by auditor):					
<i>There is No non-compliance was found in this RSPO ASA-1.1 + ASA-1.2 onsite audit activity.</i>					
Non-Conformance Description (filled by auditor):					
Root Cause Analysis (filled by organization audited):					
Correction (filled by organization audited):					
Corrective Action (filled by organization audited):					
Assessor Evaluation and Conclusion (filled by auditor):					
Verified by	:				

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

NCR No.	:		Issued by	:	
Date Issued	:		Time Limit	:	
NC Grade	:		Date of Closing	:	
Standard Ref. & Requirement	:				
Evidence observed (filled by auditor): <i>There is No non-compliance was found in this RSPO ASA-1.3 onsite audit activity.</i>					
Non-Conformance Description (filled by auditor): 					
Root Cause Analysis (filled by organization audited): 					
Correction (filled by organization audited): 					
Corrective Action (filled by organization audited): 					
Assessor Evaluation and Conclusion (filled by auditor): 					
Verified by	:				

3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	3.4.3	<p>The social and environmental management and monitoring plan is implemented, monitored and updated periodically in a participatory manner</p> <p>The company has carried out environmental management and monitoring as outlined in the RKL RPL document, for example for the period of semester 2 of 2021. Referring to KepmenLH 45 of 2005 concerning Reporting on the Implementation of Environmental Permits, where it is explained that in writing the report, there must be a match between the descriptions of the impacts being managed with the environmental component being monitored.</p> <p>In the documents shown, the data presentation still cannot describe the actual and correct results of management and monitoring, in some of the period information and measurement results.</p>
2	4.2.3	<p>The unit of certification informs the parties of the progress of the complaint handling, including the agreed time frame, and the results are available and communicated to the relevant stakeholders.</p> <p>Based on the results of interviews, the Sawit Bersama Cooperative has submitted a complaint in 2022 regarding the delay in payment of FFB sales to GKMM and MWHM. The company has shown the recording of complaints from stakeholders in the MWHE, GKME, and GKMM, and MWHM units for 2021-2022, but the complaints have not been listed. Companies are encouraged to ensure the recording and realization of complaints from stakeholders.</p>
3	7.2.10	<p>There is a record of the results of the annual special medical examination for pesticide operators and documented evidence of follow-up on the results of the examination.</p> <p>The company has carried out regular health checks for all of its employees once a year for units of GKME, MWHE, and MWHM which were carried out in the period March 2022. The last special medical examination was carried out in 2019 and in accordance with the provisions conducted twice a year (6 months) for workers with high risk levels. In 2020-2021 the company does not carry out special health examination activities due to the COVID-19 Pandemic so that activities that cause large gatherings of people are limited. In 2022 the company has planned to implement it in early 2022, but it is constrained by the condition of the cholinesterase, spirometry and audiometry examination equipment that it owns has experienced problems because it has not been used for 2 years.</p> <p>To overcome this, the company plans to submit the special medical examination to a third party in accordance with Letter No. 12/SPO-KT1/KALTIM 1/6/2022 dated 20 June 2022 regarding the Application for a Special Health Examination for PT Kresna Duta Agroindo. The letter was based on the submission of examination prices from 2 vendors (Berau Khatulistiwa Clinical Laboratory and Permata Melak Clinical Laboratory) which were submitted to the company on June 6, 2022. Based on the results of interviews with management, it is known that the realization of the special medical examination activity is planned for July. 2022.</p> <p>Companies are encouraged to ensure that these special health checks can be realized by 2022.</p>
4	6.7.3	<p>Workers use appropriate Personal Protective Equipment (PPE), and it is provided free of charge to all workers in the workplace, as protection in all operations that have potential hazards, such as pesticide application, machine operation, land preparation, and harvesting. Sanitation facilities are available for workers who use pesticides so that workers can remove PPE, clean themselves and put on their personal clothes.</p>

No	Ref. Std.	Description
		<p>Based on the results of field observations at MWHM, it is known that there are several workers who work in one station using different PPE for foot protection, namely Safety Shoes and Boots (regular). In the SOP for Personal Protective Equipment Management (No. SOP/SMART/HESS-EHSD/SADV/010/005 dated July 01, 2014) in the PPE Requirements Standard section which explains that for workers working at sorting stations, loading ramps, sterilizers, presses and boiler stations, the shoes that must be used can be in the form of Safety Boots (Boots with toe caps/finger protectors) or Safety Shoes. However, according to the observations above, the shoes used are ordinary boots without toe caps/finger protection. In addition, the MWHM HIRAC document explains that the controls specified for the hazard sources that exist in each of these stations are procedures (IK), warnings and PPE.</p> <p>Based on the results of interviews from the workers mentioned above, it is known that all of these workers have received PPE in the form of Safety Shoes every year by the company for free and are still in good condition to use, but when working the workers are more comfortable using ordinary boots compared to standard PPE. (Safety Boots (Boots with toe caps/finger protection) and Safety Shoes). For the last 3 months (March-May 2022) the company has always carried out OHS inspections which function as control over the implementation of OHS in the plantations and factories. From the inspection results, there were no violations related to the use of PPE that occurred at MWHM. In addition, in the recapitulation of work accidents for the past year (June 2021 – May 2022) there has never been a work accident in the factory environment.</p> <p>Companies are encouraged to monitor compliance with the use of appropriate PPE in the factory operational area (MWHM).</p>
5	7.3.1	<p>There is a waste management plan that is documented and implemented in accordance with applicable laws and regulations, including reduction, recycling, reuse, and disposal, based on the characteristics of toxicity (toxicity) and other hazards.</p> <p>Based on the results of field visits to the MWHM and MWHE housing areas, there are traces of burning waste in which there is residual plastic waste. In addition, there is garbage piled up in the Blok C10/11 MWHE area and behind the Pondok 2 MWHE house. The company has solid, liquid and air waste management procedures in the Waste Management SOP with No. The SOP/SMART/LEMS-EHSD/SADV/I/002 dated July 2, 2014 which was approved by the Head of Upstream explained the identification and management of waste generated from the company's operational activities, such as:</p> <ul style="list-style-type: none"> • Waste management in point 2.2.4 (b), namely, "Waste management is carried out in accordance with the internal provisions of the Sinar Mas Plantation and applicable laws and regulations referring to the clean production mechanism approach that applies several principles, including: (1) Reduce, Reuse and Recycle (3R), (2) Zero burning or no burning, and (3) Disposal or hoarding." • The management of domestic solid waste in the form of household waste is explained in point 2.2.4 (i.3) namely, "Inorganic waste is collected in the trash cans/bins that have been provided for further transport by garbage trucks to the Final Waste Disposal Site (TPSA). in the estate area to be stockpiled, or managed according to the 3R (Reduce, Reuse, Recycle) principle." <p>In addition, the company has shown evidence of domestic waste management documents as follows:</p> <ul style="list-style-type: none"> • Documentation of garbage cleaning on 23 June 2022 in the MWHM housing area and Block C10/11 MWHE. • Minutes of socialization on housing cleanliness, waste separation, no burning of garbage, prohibition of using LB3 containers in cottages on 22 June 2022 to 34 people at MWHM and

No	Ref. Std.	Description
		<p>GKMM.</p> <ul style="list-style-type: none"> • Environmental patrol program in housing which is planned once every 1 year in 2022. <p>Thus, companies are encouraged to carry out waste management that is documented and implemented.</p>
6	7.12.2	<p>HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>a. For existing plantations, which have carried out an HCV assessment by an RSPO approved assessor and have not cleared any new land after 15 November 2018, the existing HCV assessment is still valid.</p> <p>b. Clearing of new land (on existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCSA assessment using the HCSA Toolkit and the latest HCV-HCSA Assessment Manual in effect at the time of the assessment. This includes stakeholder consultation and considering the wider landscape.</p> <p>The company has conducted initial HCV identification in 2013, with the designation of the Elang River Border area of 159.47 ha. In 2021 the company conducted a review which resulted in a change in the area to 42.08 ha</p> <p>From interviews with management, this is due to the consideration of differences in the position of river flows that are not suitable for the flow of the Elang River where some of the river boundaries in question are not natural but water flows that are designed for agronomic purposes in order to facilitate circulation.</p> <p>Companies are encouraged to ensure that the determination of the HCV area is in accordance with the actual documented conditions.</p>

3.4.4. Noteworthy Positive Components

No	Description
1	The company has ISCC certified.
2	Good relationship with surrounding communities



3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Plantation Agency of Kutai Timur Regency PT Kresna Duta Agroindo has established a good communication relationship with the agency. During the past year, there has been no request for information given to the certification unit. The certification unit has obtained the results of the Plantation Business Assessment conducted by the agency, has an IUP document, has reported to LPUP regularly, there is no peatland and is not included in the Indicative Map for Granting New Permits in 2021. During 2021 to 2022 (May)) there are no issues/events or reports related to land claims/disputes/fires that occurred in the operational area of PT Kresna Duta Agroindo.	During 2021 to date (May 2022) there have been no issues/events or reports related to disputes/claims/fires that occurred in the operational area. All permits in the plantation sector have been owned and reports have been reported regularly every year (since 2021).
Kombeng Bersatu Cooperative (FFB Supplier). Over the past year, the communication relationship between the company and the cooperative management is quite good. Currently the existing partnership between the company and the cooperative is a partnership for FFB purchasing activities. For the quality of FFB sent to the mill, the standards follow the same standards as the nucleus plantations. The cooperative party has a partnership agreement that has been signed by both parties, where each party has a copy of the partnership agreement with the same legal force. The land legality documents owned by the cooperative are in the form of SHM for each plot belonging to the members and the boundaries are in accordance with their respective permits. Currently, the cooperative has 1,600 farmers from 7 small cooperatives and 58 different farmer groups. For determining the price of FFB used for cooperatives, the price of FFB determined by the government, where so far the payment has been in accordance with the specified price and there has never been a difference in it. For the timely payment of FFB purchases, the company always pays them on time in accordance with the provisions in the agreement.	The company has a cooperation agreement with the cooperative in terms of development, management and sale and purchase of FFB. For the FFB purchase price, the company uses the FFB price fixing that has been determined by the local Plantation Service every period. Based on the sorting results at Muara Wahau Mill and Gunung Kombeng Mill, it is known that the specified FFB standards have followed company standards where there are several sorting categories including raw fruit, ripe fruit, empty bunch, and so on.
Sawit Bersama Cooperative (FFB Supplier). Over the past year, the communication relationship between the company and the cooperative management is quite good. Currently, the existing partnership between the company and the cooperative is a partnership for the development, management and purchase of FFB. For the quality of FFB sent to the mill, the standards follow the same standards as the nucleus plantations. The cooperative party has a partnership agreement that has been signed by both parties, where each	The company has a cooperation agreement with the cooperative in terms of buying and selling FFB. For the FFB purchase price, the company uses the FFB price fixing that has been determined by the local Plantation Service every period. Based on the sorting results at Muara Wahau Mill and Gunung Kombeng Mill, it is known that the specified

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>party has a copy of the partnership agreement with the same legal force.</p> <p>The land legality documents owned by the cooperative are in the form of SHM for each plot belonging to the members and the boundaries are in accordance with their respective permits. Currently, the cooperative has a land area of 2,224 hectares with a membership of about 1350 farmers.</p> <p>For determining the price of FFB used for cooperatives, the price of FFB determined by the government, where so far the payment has been in accordance with the specified price and there has never been a difference in it. However, the timeliness of payments is often delayed and does not comply with the provisions in the partnership agreement.</p>	<p>FFB standards have followed company standards where there are several sorting categories including raw fruit, ripe fruit, empty bunch, and so on.</p> <p>Regarding the complaint of late payment, it has been explained in indicator 4.2.3</p>
<p>Manpower and Transmigration Agency of Kutai Timur Regency</p> <ul style="list-style-type: none"> - There is one issue related to complaint of and Specific Time Work Agreements/ "PKWT" that demand to be appointed as permanent employees. - Compulsory reports by companies such as employment report has been reported annually. - The CLA 2022-2024 has been issued in 2022. - There is not any migrant labor employed by the company. - There is no issue related to communication between company with Manpower Agency. 	<p>There are no issues that need further clarification.</p>
<p>Gender Committee</p> <ul style="list-style-type: none"> - Gender committee in each unit of mill and estate has been contained organizer and member from female workers. - Gender committee programs including to accommodating female workers related on gender issue in workplace. - There are no issues related to sexual harassment or violence during audit period. - All female workers have been socialized on sexual harassment policy, grievance mechanism and its clearly understood. 	<p>There are no issues that need further clarification.</p>
<p>Labor Union (<i>Serikat Pekerja Mandiri</i>) of PT KDA</p> <ul style="list-style-type: none"> - Labor union in each unit and has been registered in Manpower Agency of Kutai Timur Regency. - There are no issue and conflicts between the company and the workers in 2021-2022. - Socialization of CLA, complaint and grievance mechanism and another company policy related to manpower aspect has been conducted to all workers. - The company provides proper and sufficient of worker welfare facility such as housing and its supporting facility. 	<p>There are no issues that need further clarification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> - The company has complied with all worker rights refers to CLA and applicable law/regulation on manpower, such as wages, BPJS, etc. - The company workers arranged in two type, permanent worker (Pekerja Tetap/PT) and PKWT. PKWT contracts provided in Bahasa and explained to the worker before signed by worker and company representative. 	
Worker Cooperative Worker cooperatives are engaged in saving and loan business sector. There is mandatory contribution and a regular contribution of Rp 100,000. Worker cooperatives has made member annual meeting and revenue sharing of 2021 in 2022.	There are no negative issues that need further verification.
Environmental Agency of Kutai Timur Regency <ul style="list-style-type: none"> • There are currently no environmental issues, last 2020 from NGOs there was an overflow of liquid waste • There are no complaints from the public regarding environmental pollution • Requests for information – as required, usually after a field visit supervision • Routine surveillance is carried out every year, last July 2021 • Company participation in the PROPER program in 2021 with a blue rating • Regular reporting and no problems • Permits (Hazardous Waste Storage, Land Application, etc.) are still valid and there are no records of problems • Active participation of the company in official activities (either in the form of participation or donations) • There is involvement of the service to the company, it can be concluded that the relationship between the service and the company is going well • No conflict with wildlife 	There are no negative issues that need further verification.
Local Contractor - PT Maharani Sukses Abadi <ul style="list-style-type: none"> • Contractor activities in the field of road paving. • Cooperation with the company has been carried out since 2008. The cooperative relationship with the company is going well. • The cooperation agreement is renewed once a year. • Contractor payments are made on time. • PPE is provided by the contractor, in the form of safety helmets, shoes, and body harnesses. • Contractors have included their employees in the BPJS Employment and Health program independently. There are no major accidents, accident handling can be done through the nearest clinic or health center 	There are no negative issues that need further verification.

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> The company conducts socialization related to OHS policies, environment, conservation, and technical procedures to contractors and will then be forwarded to members. There are no complaints or suggestions for the company regarding operations 	
Local Contractor - PT Aldi Mitra Sejahtera <ul style="list-style-type: none"> Contractor activities in the field of FFB transporter. Cooperation with the company has been carried out since 2008. The cooperative relationship with the company is going well. The cooperation agreement is renewed once a year. Contractor payments are made on time. PPE is provided by the contractor, in the form of safety helmets, shoes, and body harnesses. Contractors have included their employees in the BPJS Employment and Health program independently. There are no major accidents, accident handling can be done through the nearest clinic or health center The company conducts socialization related to OHS policies, environment, conservation, and technical procedures to contractors and will then be forwarded to members. There are no complaints or suggestions for the company regarding operations 	<p>There are no negative issues that need further verification.</p>
Village Heads of Miau Baru and Suka Maju <ul style="list-style-type: none"> Good relationship with the company. So far there have been no issues related to environmental pollution. Some villagers work for the company. There are no issues related to land disputes. The company often provides social assistance to the community. The company receives FFB from the community. 	<p>There are no negative issues that need further verification.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Kresna Duta Agroindo Head of Sustainability Management System and Certification Operations Sustainability</p>  <p><u>Yahya Mustakim</u> Friday, 01 July 2022</p> </div> <div style="text-align: center;"> <p>MUTU International Lead Auditor</p>  <p><u>Briyogi Shadiwa</u> 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	Plantation Agency	Kutai Timur Regency	-	Interview by phone	21 June 2022	✓	
2	Kombeng Bersatu Cooperative	Kutai Timur Regency	-	Interview by phone	21 June 2022	✓	
3	Sawit Bersama Cooperative	Kutai Timur Regency	-	Interview by phone	21 June 2022	✓	
4	Manpower and Transmigration Agency	Kutai Timur Regency	-	Interview by phone	21 June 2022	✓	
5	Gender Committee	PT Kresna Duta Agroindo	-	Direct interview	21 June 2022	✓	
6	Enviormental Agency	Kutai Timur Regency	-	Interview by phone	21 June 2022	✓	
7	Local Contractor - PT Maharani Sukses Abadi	Kutai Timur Regency	-	Interview by phone	21 June 2022	✓	
8	Local Contractor - PT Aldi Mitra Sejahtera	Kutai Timur Regency	-	Interview by phone	21 June 2022	✓	
9	Village Heads of Miau Baru and Suka Maju	Kutai Timur Regency	-	Interview by phone	21 June 2022	✓	
10	Labor Union (<i>Serikat Pekerja Mandiri</i>) of PT KDA	PT Kresna Duta Agroindo	-	Direct interview	21 June 2022	✓	
11	Worker Cooperative	PT Kresna Duta Agroindo	-	Direct interview	21 June 2022	✓	
12	Sawit Watch	Bogor, Indonesia	info@sawitwatch.or.id	Email	14 June 2022		✓
13	WWF	Jakarta, Indonesia	wwf-indonesia@wwf.or.id	Email	14 June 2022		✓
14	WALHI	Jakarta, Indonesia	informasi@walhi.or.id	Email	14 June 2022		✓
15	AMAN	Jakarta, Indonesia	rumahaman@cbn.net.id	Email	14 June 2022		✓
16	Muara Wahau Mill: <ul style="list-style-type: none"> • 1 Storage Operator • 1 Workshop Operator • 1 WTP Operator • 1 foreman dan 3 sortation workers • 1 sterilizer operator • 2 press operator • 1 kernel operator • 1 clarification operator • 1 engine room operator • 2 boilerman dan 2 helpers 	PT Kresna Duta Agroindo	-	Visit and Interview	21 June 2022	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
17	Muara Wahau Estate: <ul style="list-style-type: none"> • 1 foreman dan 3 pesticide aplicators • 1 foreman, 3 harvesters dan 3 pickers • 1 foreman dan 2 upkeep workers • 1 mini tractor grabber operator • 1 Chemical Storage Operator • 1 Workshop Operator • 1 Clinic Worker • 1 Firefighters Operator • 4 Daycare Workers • 1 Rinse House Worker 	PT Kresna Duta Agroindo	-	Visit and Interview	22 June 2022	✓	
18	Gunung Kombeng Estate: <ul style="list-style-type: none"> • 1 Storage Operator • 1 Firefighting Equipment Storage • 1 foreman, 3 harvester and 3 pickers • 1 foreman dan 4 pesticide aplicators • 1 mini tractor grabber operator • 2 census workers • 1 foreman dan 2 upkeep workers 	PT Kresna Duta Agroindo	-	Visit and Interview	23 June 2022	✓	

Appendix 2. Assessment Program

DATE	20 – 25 June 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 20 June 2022		
05.00 – 10.50	JAKARTA → BALIKPAPAN → BERAU	All Auditor
11.00 – 17.00	BERAU → PT KRESNA DUTA AGROINDO	All Auditor
Tuesday, 21 June 2022		
08.00 – 09.00	Opening meeting : <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	All Auditor
09.00 – 12.00	<ul style="list-style-type: none"> public consultation with stakeholder to relevant agency in Kutai Timur Regency by Phone Stakeholder consultation to affected communities surrounding the plantations and previous land owner. Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier. 	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Field observation to Muara Wahau POM: <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO) Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond) Implementation of Employment Procedure and Mechanism Aspect <p>Presentation of Daily Progress</p>	All Auditor
Wednesday, 22 June 2022		
08.00 – 12.00	Field Observation to Muara Wahau Estate Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect of Workers Facilities (Housing, School, Worship Place). with related personels during field observation 	All Auditor
12.00 – 14.00	Break	All Auditor

DATE	20 – 25 June 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
14.00 – 17.00	Field observation to Gunung Kombeng POM (ISPO SCOPE): <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO) Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond) Implementation of Employment Procedure and Mechanism Aspect Presentation of Daily Progress	All Auditor
Thursday, 9 June 2022		
08.00 – 12.00	Field Observation to Gunung Kombeng Estate Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect of Workers Facilities (Housing, School, Worship Place). with related personels during field observation 	All Auditor
12.00 – 14.00	Break	
14.00 – 17.00	<ul style="list-style-type: none"> Document review and completing audit checklist. Continue interview with Related Agencies, Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier Presentation of Daily Progress. 	All Auditor
Friday, 24 June 2022		
08.00 – 10.00	Diskusi Internal Tim Auditor	All Auditor
10.00 – 12.00	Closing Meeting : <ul style="list-style-type: none"> Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timelie of CAR's, Conclusion) Comments, Responses and Questions 	All Auditor
12.00 – 17.00	PT KRESNA DUTA AGROINDO → BERAU	All Auditor
Saturday, 25 June 2022		
07.50 – 12.00	BERAU → BALIKPAPAN → JAKARTA	All Auditor