

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

[✓] Surveillance

Name of Management Organization : **Eagle High Plantation Palm Oil Mill – PT Eagle High Plantation, Tbk Subsidiary of Eagle High Plantation**

Plantation Name : PT Bumilanggeng Perdanatrada, consist of Arjuna Estate, Bromo Estate and Semeru Estate.

Location : Sungai Bedaun Village, Sub District of Kumai, District of Kotawaringin Barat, Kalimantan Tengah Province, Indonesia.

Certificate Code : **MUTU-RSPO/127**

Date of Certificate Issue : 10 May 2019 Date of License Issue : 10 October 2022

Date of Certificate Expiry : 09 May 2024 Date of License Expiry : 09 May 2023

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-2 (Remote Audit)	15 to 16 July 2020	Moh Arif Yusni (Lead Auditor), Afiffuddin, Radityo Puspanjana, Johannes Pandiangan (Trainee)	Moh Arif Yusni	Leonada
ASA-2 & ASA-3 (Onsite Audit)	06 to 11 June 2022	Haikal Ramadhan Kharismansyah (<i>lead auditor</i>), Arief Tajalli, Leonada, and Kiki Fadli (Trainee)		

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-2 & ASA-3	22 September 2022

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Figure 1. Location Map of PT Eagle High Plantation & PT Bumi Langgeng Perdanatrada

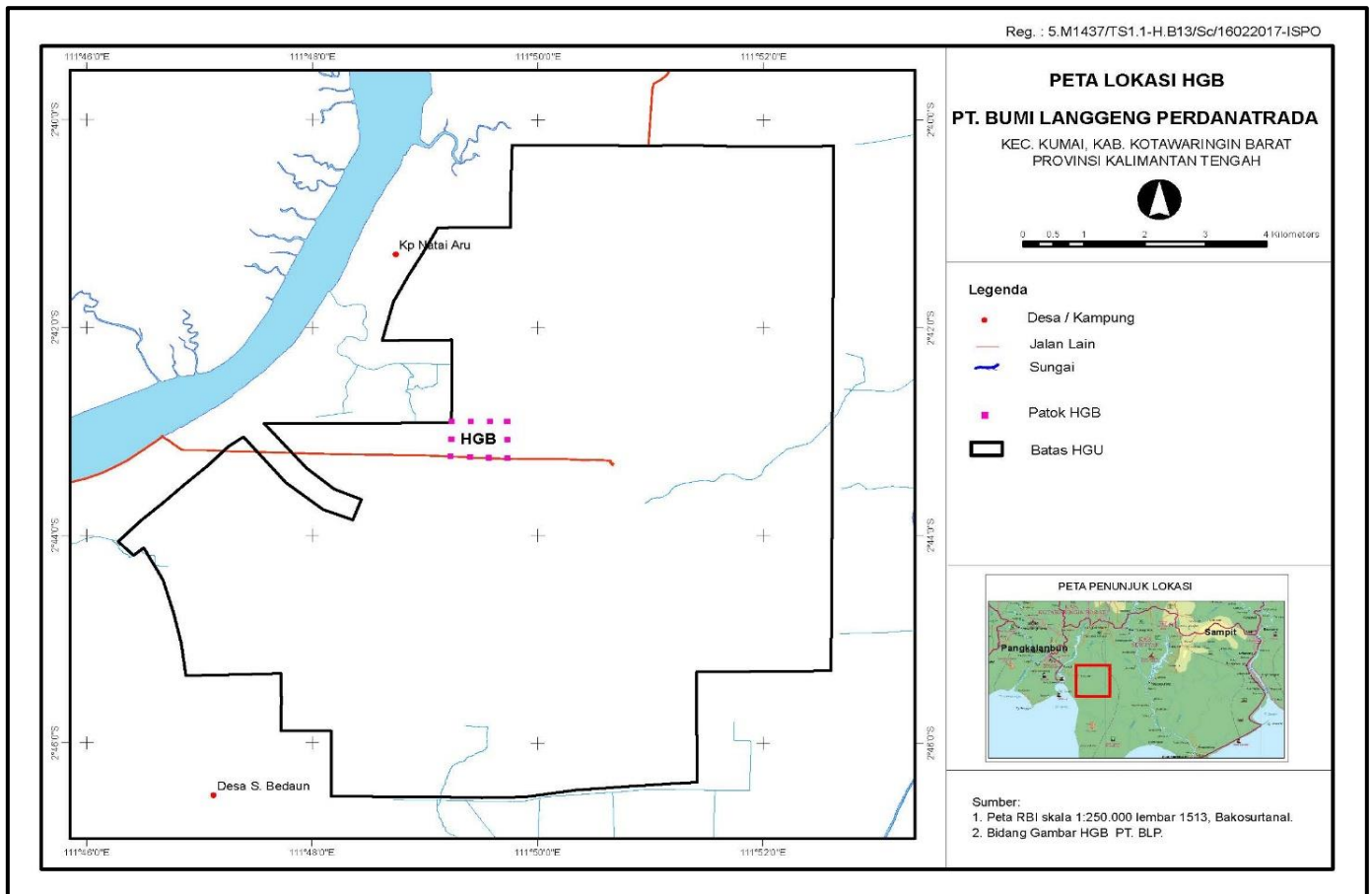
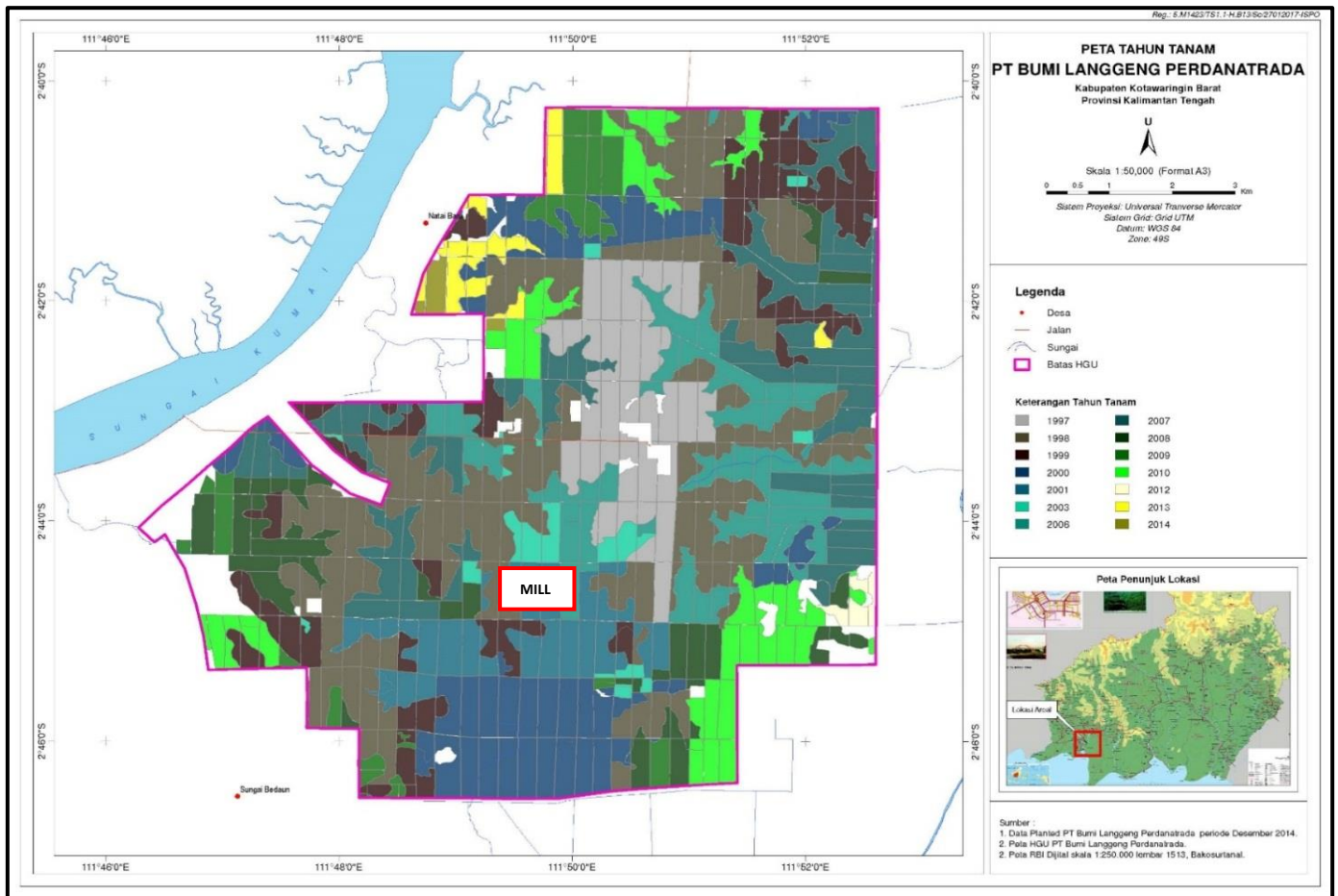


Figure 2. Operational Map of PT Eagle High Plantation & PT Bumi Langgeng Perdanatrada



Abbreviations Used

ASA	:	Annual Surveillance Assessment
BLP	:	Bumilanggeng Perdanatrada
BMP	:	Best Management Practices
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jasa Sosial</i>
BRME	:	<i>Bromo Estate</i>
CEO	:	Chief Executive Officer
CH	:	Cerificat Holder
COO	:	Chief Operating Officer
CITES	:	Convention, International, Threatened, Endangered Species
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
EHP	:	Eagle High Plantation
EHS	:	Environmental, Health and Safety
EIA	:	Environmental Impact Assessment
FFB	:	Fresh Fruit Bunch
FPIC	:	Free, Prior and Informed Consent
FR	:	Frequency Rate
GAP	:	Good Agricultural Practice
GHG	:	Green House Gases
HCCS	:	Human Capital Corporate Service
HCV	:	High Conservation Value
HGU	:	Hak Guna Usaha (Land Use Title/Right)
HIRAC	:	Hazard Identification Risk Assessment and Control
HSE	:	Health Safety and Environment
IPM	:	Integrated Pest Management
IUCN	:	International Union for Conservation of Nature
KER	:	Kernel Extraction Rate
LCC	:	Legume cover crop
LSU	:	Leaf Sampling Unit
LTA	:	Lose Time Accident
LUCA	:	Land Use Change Analysis
MSDS	:	Material Safety Data Sheet
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
OHSAS	:	Occupational Health and Safety Assessment Series
P&C	:	Principle and Criteria
PIC	:	Person in charge
PK	:	Palm Kernel
P & L	:	Permit & License
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personel Protective Equipment
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> OHS Committee
R & D	:	Research & Development
RKL- RPL	:	Environment Management and Monitoring Report
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, threatened or endangered

SCCS	:	Supply Chain Certification System
SEIA	:	Social Environmental Impact Assessment
SIA	:	Social Impact Assessment
SMRE	:	Semeru Estate
SPO	:	Sustainability Palm Oil
SOP	:	Standard Operating Procedure
SR	:	Severity Rate
SSU	:	Soil Sampling Unit
UDHR	:	Universal Declaration of Human Rights
WHO	:	World Health Organization
WTP	:	Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> • RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020. • Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th April 2020. 	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT Eagle High Plantations, Tbk.	
1.2.2	Contact person	IB Gede Astawa	
1.2.3	Organisation address and site address	RSPO registered company: Noble House, 11th floor Jl. DR. Ide Anak Agung Gede Agung Kav. E 4.2 No. 2 Kawasan Mega Kuningan, Jakarta 12950 – Indonesia.	
1.2.4	Telephone	(+62) 21-29783093	
1.2.5	Fax	(+62) 21-29783082	
1.2.6	E-mail	gede.astawa@eaglehighplantations.com	
1.2.7	Web page address	http://www.eaglehighplantations.com/	
1.2.8	Management Representative who completed the application for certification	IB Gede Astawa	
1.2.9	Registered as RSPO member	1-0048-08-000-00 21 March 2008	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base <ul style="list-style-type: none"> • EHP Mill – PT Eagle High Plantations • Arjuna Estate, Semeru Estate, Bromo Estate – PT Bumilanggeng Perdanatrada 	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	EHP Mill	Sungai Bedaun Village, Kumai Sub District, Kotawaringin Barat District, Kalimantan Tengah Province, Indonesia	S 02°42'30" E 111° 49' 20"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Arjuna	Sungai Bedaun Village, Kumai Sub District, Kotawaringin Barat District, Kalimantan Tengah Province, Indonesia	S 02°40'15" E 111°47'20"
	Semeru	Sungai Bedaun Village, Kumai Sub District,	S 02°43'15" E 111°46'15"

	Kotawaringin Barat District, Kalimantan Tengah Province, Indonesia				
Bromo	Sungai Bedaun Village, Kumai Sub District, Kotawaringin Barat District, Kalimantan Tengah Province, Indonesia	S 02°44' 50"	E 111°46'45"		
1.5	Description of Area Statement				
1.5.1	Tenure				
	• State (HGU:8,876.60 Ha & HGB: 64.52 Ha)	8,941.12	Ha		
	• Community	-	Ha		
	<i>*The scope of certification is 8,711.54 Ha because an area of 41.58 (Occupation) and an area of 188 Ha (HPK that is still in the process of being released) are excluded from the scope</i>				
1.5.2	Area Statement				
	• Total area	8,711.54	Ha		
	• Mature area	8,262.48	Ha		
	• Immature area	-	Ha		
	• Mill	64.52	Ha		
	• Emplacement & Infrastructure	226.97	Ha		
	- Others area (Quary)	11.00	Ha		
	- HCV **	146.57	Ha		
	<i>**The total HCV area is 4,829.94 (based on identification HCV in 2013). HCV area consist of secondary forest: 146.57 Ha; and other areas included in planted area (riparian 208.58 Ha; sacred place 0.005 Ha; and deep peat 4,474.78 Ha)</i>				
1.6	Planting Year and Cycles				
1.6.1	Age profile of planting year				
	Planting Year	Hectarage (Ha)			
		Arjuna	Semeru	Bromo	Total
	1997	473.44	240.15	-	713.59
	1998	648.87	974.42	287.73	1,911.02
	1999	439.01	84.20	242.23	765.44
	2000	274.41	78.60	595.13	948.14
	2001	-	110.46	367.79	478.25
	2003	17.19	104.43	22.30	143.92
	2006	271.12	497.21	-	768.33
	2007	658.55	422.59	-	1,081.14
	2008	34.99	275.46	189.17	499.62
	2009	96.50	48.51	78.28	223.29
	2010	165.86	83.00	288.64	537.50
	2011	-	-	-	-
	2012	-	36.46	-	36.46
	2013	117.50	-	-	117.50
	2014	38.28	-	-	38.28
	TOTAL	3,235.72	2,955.49	2,071.27	8,262.48
1.6.2	New Planting area after January 2010 (without NPP Verification)		729.74 Ha		
1.6.3	Planting Cycle		1 st Cycle		
1.7	Description of Mill and Supply Base				
1.7.1	Description of Mill				

	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO				
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	EHP	60	297,611.50	63,529.64	21.35	11,653.76	3.92	
<i>*Production data source from August 2020 – May 2022</i>								
1.7.2	Description of Certification Scope of Supply Base							
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)	Supplied to Mill		
						FFB (tonnes/year)	%	
	Arjuna	3,510.20	3,235.72	77,821.00	13.36	24.05	100	
	Semeru	3,058.02	2,955.49	75,598.69	14.20	25.57	100	
	Bromo	2,143.32	2,071.27	46,782.37	12.54	22.58	100	
	TOTAL	8,711.54	8,262.48	200,202.06	13.46	200,202.06	100	
<i>*Production data source from August 2020 – May 2022</i>								
1.7.3	FFB description from other source							
	Name of sources/ Organisation	Type of Organisation		number of smallholders	Production Area (Ha)	Supplied to Mill		
						FFB (tonnes/year)		
	HPK Arjuna	PT Bumilanggeng Perdanatrada		-	177	4,612.46		
	Arjuna Cadastral	PT Bumilanggeng Perdanatrada		-	216	4,069.01		
	Semeru Cadastral	PT Bumilanggeng Perdanatrada		-	68	1,370.93		
	Bromo Cadastral	PT Bumilanggeng Perdanatrada		-	300	2,787.59		
	Bromo Plasma	Associate Smallholder		1,434	1,850.68	38,749.75		
	Arjuna Plasma	Associate Smallholder		399	384.41	3,774.83		
	Sanction area NPP	PT Bumilanggeng Perdanatrada		-	729.74	17,796.01		
	H. Salman/KTHB	Independent Supplier		-	-	1,348.72		
	ponadin	Independent Supplier		-	-	4,009.37		
	Edi Efendi	Independent Supplier		-	-	6,174.21		
	CV.HOSANA	Independent Supplier		-	-	2,257.34		
	CV.MBU	Independent Supplier		-	-	1,731.17		
	CV.APT	Independent Supplier		-	-	6,246.12		
	CV.Arut Permai	Independent Supplier		-	-	237.29		
	CV.Sudar Mustakim	Independent Supplier		-	-	764.77		
	CV.PP	Independent Supplier		-	-	301.41		
	CV.Karya Bersama	Independent Supplier		-	-	1,129.60		
	KUD Tani Subur	Independent Supplier		-	-	54.64		
	TOTAL						97,415.22	
<i>* Production data source from August 2020 – May 2022</i>								
<i>* The total production of certified and uncertified FFB is 297,617.28</i>								
1.7.4	Product categories			FFB, CPO, PK				
1.8	Tonnage of Product							
1.8.1	Past Annual Claim Certified Product			Estimate Production period of 10 Aug 2020 – 09 Aug 2022		Actual Production (MT) of previous audit (Aug 2020 - May 2022)		
	FFB Processed			241,23		200,202.06		

	CPO Production		43,97		43,100.34			
	Palm Kernel (PK) Production		8,60		8,053.14			
1.8.2	Product selling							
	Type of selling product	Actual selling product for last year (MT)						
	CSPO sold as RSPO certified product				32,000.00			
	CSPK sold as RSPO certified product				0			
	CSPO sold under another scheme				0			
	CSPK sold under another scheme				0			
	CSPO sold as conventional				9,671.18			
	CSPK sold as conventional				7,895.81			
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Arjuna	3,510.20	3,235.72	44,490.00	13.74			
	Semeru	3,058.02	2,955.49	43,200.00	14.61			
	Bromo	2,143.32	2,071.27	26,800.00	12.93			
	TOTAL	8,711.54	8,262.48	116,420.00	14.09			
	<i>*Estimated production has added production potential from the sanction area of 729.74 Ha because since June 2022 FFB from this area can be claimed as certified FFB</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		PK		Supply Chain Module
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	EHP	60	116,420.00	25,613.00	22.00	4,660.00	4.00	MB
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			-				
	Others			ISPO. MUTU-ISPO/118(27 July 2018 till 26 July 2023 Proper Hijau from Ministry of Environmental and Forestry Period of 2018-2019				
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		
	Mill	Time Bound Plan						
	EHP Mill (PT Eagle High Plantations)	2019	Arjuna Estate (BLP)	2019	Kotawaringin Barat, Kalimantan Tengah	Certified		
			Semeru (BLP)	2019				
			Bromo (BLP)	2019				

		BLP cadastral	2023		HGU Process
		Arjuna Plasma	2023		HGU Process
		Bromo Plasma	2023		HGU Process
Bangkirai Mill (PT Jaya Mandiri Sukses)	2022	Bangkirai Estate (JMS)	2022	Kutai Kartanegara, Kalimantan Timur	Stage-1 audit
		Gaharu Estate (JMS)	2022		
		Kulim Estate (JMS)	2022		
		Angsana Estate (JMS)	2022		
		Trembesi Estate (JMS)	2022		
		Jatimas Estate (JMS)	2022		
		Cendana Estate (STP)	2023		LUCA process
		Sungkai Estate (MAJ)	2023		LUCA process
		Damar Estate (MAJ)	2023		LUCA process
BHL Mill (PT Bumihutani Lestari)	2023	Sibayak (BHL)	2023	Kotawaringin Timur and Katingan, Kalimantan Tengah	
		Rinjani (BHL)	2023		
		Kerinci (BHL)	2023		
		Bukit Raya (BHL)	2023		
		Papandayan (BHL)	2023		
		Rinjani Plasma (BHL)	2023		HGU Process
		Kerinci Plasma (BHL)	2023		HGU Process
ADS Mill (PT Adhyaksa Dhamasatya)	2023	Pangrango (ADS)	2023	Kotawaringin Timur, Kalimantan Tengah	LUCA process
		Merbabu (ADS)	2023		LUCA process
Kelampai Mill (PT Arrtu Plantation)		Padang Bunga (APN)	2023	Ketapang – Kalimantan Barat	LUCA process
		Energie Pawan (AER)	2023		LUCA process
		Siantau (ABP)	2023		LUCA process
		Pelanjau (AAN)	2023		LUCA process
		Nusantara Jaya (AAN)	2023		LUCA process
		Agro Jaya (AAN)	2023		LUCA process
		Mahota (MKJ)	2023		LUCA process
		Bidara (MKJ)	2023		LUCA process

Batu Bulan Mill (PT Suryabumi Tunggal Perkasa)	2023	Intan (STP)	2023	Kotabaru, Kalimantan Selatan	LUCA process
		Merah Delima (STP)	2023		LUCA process
		Berlian (JMS)	2023		LUCA process
		Kualam (JMS)	2023		Tanah Bumbu, Kalimantan Selatan
		Batu Bulan (SGA)	2023	LUCA process	
		Topas (SGA)	2023	LUCA process	
		Emerald (SGA)	2023	LUCA process	
		Safir Mill (PT Pesona Lintas Surasejati)	2023	Safir Estate (PLS)	2023
Mutiara (SKS)	2023			LUCA process	
Kalimaya (KAPAG)	2023			LUCA process	
Permata (MAJ)	2023			LUCA process	
Tulip Mill (PT Tandan Sawita Papua)	2023	Anggrek (TSP)	2023	Keerom, Papua	
		Dahlia (TSP)	2023		
		Rafflesia (TSP)	2023		
		Tulip (TSP)	2023		
		Aggrek Plasma (TSP)	2023		

*TBP revised on June 2022

1.10.2 **Progress of Associated Smallholders and Outgrowers for Certifiable Standard**

As described in the TBP scheme smallholder plan to be certified in 2023

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-2 Remote Audit	<ol style="list-style-type: none"> Moh Arif Yusni (Lead Auditor). Indonesian citizen. Bachelor of Agriculture, majoring in Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor course in 204, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, RSPO and ISPO Lead auditor refresher course in 2021 etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. During the audit, he verifies TBP, Partial certifications, Legality, Social and transparency. Radytio Puspanjana (Auditor). Indonesian Citizen. Bachelor of agriculture, majoring in Soil Science. Agriculture Faculty. He was working as honorarium Officer at the Riau Province Plantation Agency in the division of huge estate for 1 year. The participated trainings are Survey and Mapping (GIS) Training which was held by National GMIT, ISPO auditor training, ISO 9001/2008 auditor training, ISO 14001/2004 auditor training, IHT Geospatial Information System, IHT High Conservation Value, IHT Environmental Impact Assessment, IHT Green House Gas and RSPO Lead Auditor Course by Checkmark Training in 2018. Since 2015 has been following many audits as auditor base on Best Management Practice and Environment. Aspect audit:, Environment, HCV, GHG. Afiffuddin (Auditor). Indonesian citizen, Diploma III majoring Palm Oil Plantation, Bogor Agricultural University. Five years working experience since 2010 at Oil Palm Plantation Company in Indonesia as agronomy operational staff and followed several trainings namely: Basic Plantation Management Program, Auditor Training Indonesian Sustainable Palm Oil (ISPO), Training of RSPO lead auditor, RSPO SCCS, OHS General Expert, OHS System Management based on PP 50 2012 and Management System Certification (ISO 9001-2015/SNI 19011-9001:2015) ISO 17021, ISO 17065, SA 8000 training. He has been involved in several audit activities related to sustainable palm oil certification since 2016 covering Best Management Practices aspect, health and safety aspect and worker welfare aspect. During this audit, He conducted an assessment on Worker Welfare. Johannes Kapri Pandiangan (trainee auditor). Indonesian citizen, Bachelor of Agriculture majoring in Agricultural Social Economics, University of North Sumatra. Has experience working for 7 years as an operational staff of one of the leading private oil palm plantation companies in Indonesia. The trainings that have been attended include: Training on emergency response to forest and land fires by the Riau Province BKSDA, IHT Certification System and ISPO P&C, IHT Awareness ISO 17021 and 17065, IHT Awareness RSPO, ISO 14001:2015 Lead Auditor Training, ISO 9001 Lead Auditor Training: 2015 and ISPO Training. In this audit activity, verification is carried out on aspects of long-term economic plans, Transparency and BMP, under supervision by the Lead Auditor.
ASA-2 & ASA-3 Onsite audit	<ol style="list-style-type: none"> Haikal Ramadhan Kharismansyah (Lead Auditor). Indonesian citizen, Bachelor of Agriculture department of plant and pest disease (Agrotechnology). He has 3 years' experience as an Agronomy Staff in private oil palm plantation in Indonesia. Training which had attended including Basic Management Development Program Agronomy, Integrated Urban Pest Management, Integrated Pest Management, ISO 9001:2015, Auditor ISPO, RSPO Lead Auditor Training, ISO 22000 awareness, RSPO SCCS, and Social Auditing by WIRE. Did some audit SPO scheme with aspects best management practices, SCCS, Legal, Social, and worker welfare. During this assessment verified Legal, FPIC, SCCS, Social, Time Bound Plan & Partial Certification Arief Tajalli (Auditor). Indonesian citizen, Bachelor of Forest Resources Conservation and Ecotourism, Faculty of Forestry, Bogor Agricultural University. Has been involved as a researcher at a wildlife laboratory, Faculty of Forestry, IPB. The trainings that have been attended include training for ISO 9001; 2008, ISO 14001; 2004, ISO 17021; 2015, ISO 17065, ISO 19011 and ISPO Auditor training by Mutu Institute and RSPO Auditor Training by Checkmark, also participating in several IHT in the field of environment, BMP, and so on. Has participated in several audit simulation activities related to the sustainable palm oil certification system since 2020 with social, environmental, GHG, and waste management aspect. During this assessment, he verified the Environmental, GHG, and Waste management aspects.

3. **Leonada (Auditor).** Bachelor of Agriculture Department of Agriculture Cultivation, Faculty of Agriculture, Plant Breeding and Seed Technology Study Program, Bogor Agricultural University. Has more than five years' experience working as a plantation operational and sustainability staff in an Indonesian private oil palm plantation company. The trainings that have been attended include: Indonesian Sustainable Palm Oil (ISPO) Auditor Training, RSPO Lead Auditor, ISO 17021; 2011, ISO 17065; 2012, ISO 19011; 2011, ISO 9001 Lead Auditor; 2008, ISO 14001; 2005, Agronomy Management Program Management Training, analysis base solution for operations, Peat management training for palm oil, Integrated Plant Pest and Weed Disease (IPM) Training, Limited Pesticide Use Training (Compost), Pesticide and Fertilizer Waste Management Training, mediation training and conflict resolution, training for General K3 Expert, SMK3 Auditor and currently working for an independent certification body as an auditor. During this assessment, he verified the Transparency and worker welfare aspects.
4. **Kiki Fadli (Auditor Trainee).** Indonesian citizen. Bachelor of Agricultural Engineering, Agricultural Engineering Study Program. Has experience working in the sustainability department in private and state-owned oil palm plantations. Has attended training on New Refreshment Lead Auditor ISPO, Lead Auditor RSPO, General OHS Expert, ISO 9001:2008, ISO 14001:2015, ISO 17021, ISO 17065, HCV, SMK3 and ISH Lead auditor training conducted by RSPO. During this assessment, he verified the BMP and OHS aspects under supervision of Lead Auditor.

Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.

2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-2 Remote Audit	Number of auditors: 3 auditor dan 1 Auditor Trainee Number of days for ASA-2 Remote Audit : 2 days Number of working days for ASA-2 at site: 6 Working days.
ASA-2 & ASA-3 Onsite audit	Number of auditors: 3 auditors and 1 trainee auditor. Number of days for ASA-2 & 3 Onsite Audit : 5 days Number of working days for ASA-2 & 3 Onsite Audit : 15 Working days
2.2.2	Assessment Process
ASA-2 Remote Audit	The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Eagle High Plantation Tbk. to the requirements of Indonesian National Interpretation 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. The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i> , aiming to obtain more detailed information and cross check the information; All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-2 . The opening meeting was held on 15 December 2021 at 08.00 am through a teleconference. As for the participants who attended the opening meeting included the Estate Manager, Mill Manager, Support Team from sustainability department and other relevant staff. while the closing meeting will take place on 16 December 2021 at 15.30 pm. attended by the same participants as the opening meeting. Commonly, the audit activities went smoothly with good support from the unit management. The presentation of documents is presented quite well using email or one drive The assessment program please find Appendix 2.
ASA-2 & ASA-3 Onsite audit	The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Eagle High Plantation Tbk. to the requirements of Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th April 2020 and RSPO Certification Systems for

Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.

The scope of certification of Eagle High Plantations POM with FFB supplied by three (3) Estates: Arjuna, Semeru and Bromo Estate. 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 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (Recert). 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 6 June 2022. As for the participants who attended the opening meeting included Plantation Controller, General Manager, Estate and Mill Managers, Support Team from Jakarta and other staff at Eagle High Plantations POM. Closing meeting was held on 10 June 2022 attended by the same participants as the opening meeting. Management PT Eagle High Plantation Tbk. accept all the onsite surveillance 1.3 audit results.

The assessment program please find Appendix 2.

2.2.3	Locations of Assessment
ASA-2 Remote Audit	Will be completed during the onsite audit.
ASA-2 & ASA-3 Onsite audit	<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>Bedaun Mill</p> <ul style="list-style-type: none"> • Land Application and Monitoring Well. Observation related to effluent handling and environment aspect etc. • Water Treatment Plant. Observations related work procedure, safety aspect, environment aspect etc. • Water Intake. Observations related work procedure, safety aspect, environment aspect etc. • WWTP. Observation related to effluent handling, work procedure, safety aspect, environment aspect etc. • Reservoir pump house. Observation related to safety aspect, environment aspect etc. • EFB, Fiber and Shell disposal area. Observation related to safety aspect, environment aspect etc. • Hazardous waste storage. Observation about storage condition, hazardous waste stock, emergency response facility, and waste management. • CPO Storage Tanks. Observation of storage tank capacity • Kernel Bins. Observation of kernel bin capacity. • Workshop. Observation and Interview related to work procedure, OHS and workers welfare aspect. • General storage. Observation about storage condition, PPE stock, emergency response and OHS implementation. • Chemical material storage. Observation about storage condition, MSDS, OHS implementation, emergency facility, and material stock. • Hydrant Test. Simulation related to fire emergency respond. • Grading Station. Observations and interviews related work procedure, safety aspect, worker welfare etc. • Loading Ramp Station. Observations and interviews related work procedure, safety aspect, worker welfare etc. • Sterilizer Station. Observations and interviews related work procedure, safety aspect, worker welfare etc. • Engine Room. Observation related work procedure, safety aspect, worker welfare, environment aspect etc. • Boiler Station. Observation and interviews related work procedure, safety aspect, worker welfare etc • Press Station. Observation and interviews related work procedure, safety aspect, worker welfare etc.

- **Nut and Kernel Station.** Observation and interviews related work procedure, safety aspect, worker welfare etc.
- **Oil Tank Station.** Observation's safety aspect, environment aspect etc.
- **Empty Bunch Area.** Observation related to waste management.
- **Security post.** Observations and interviews regarding supply chain flows, emergency response management, and employment aspects.
- **Weighbridge station.** Observations and interviews regarding supply chain flows, labor aspects, and understanding related to recording certified or uncertified products

Arjuna Estate

- **HGU Pole No. BPN93 Block D30.** Observation the conditions and position of legal boundary.
- **HGU Pole No. BPN94 Block D29.** Observation the conditions and position of legal boundary.
- **HGU Pole No. BPN91 Block E31.** Observation the conditions and position of legal boundary.
- **HGU Pole No. BPN29 Block F50.** Observation the conditions and position of legal boundary.
- **HCV area Block F39/F40 Riparian springs.** Observation related to management of environmental aspect.
- **HCV area Block D29B, Forest Area (For now is ex-palm oil planted area).** Observation related to management of environmental aspect.
- **HCV area Block F47B2, Riparian area.** Observation related to management of environmental aspect.
- **Occupations area Block E32 and F31.** Observation related to management of environmental aspect.
- **Day care facility.** Observation about facility and interview about worker welfare, gender committee, and facility for worker.
- **Employee Housing.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, educational facilities, religious facilities, health facilities and sports facilities.
- **Fertilizer storage.** Observation about storage condition, fertilizer stock, and OHS implementation.
- **PPE Storage.** Observation about facility and PPE stock.
- **Rinse House.** Observations related to the management of agrochemical materials and waste, MSDS, emergency response facilities and types of pesticides used.
- **Agrochemical storage.** Observation about storage condition, agrochemical stock, OHS implementation, and interview with 1 worker about worker welfare, OHS implementation, and understanding of work procedure.
- **Hazardous waste storage.** Observation about storage condition, hazardous waste stock, emergency response facility, and waste management.
- **Solar Tank.** Observations related to material handling, OHS and environmental management.
- **Engine room.** Observations and interviews related to operations, understanding of emergency response, OSH aspects and employment.
- **Firefighting storage.** Observation about condition the firefighting facilities and equipment.
- **Workshop.** Observation and Interview related to work procedure, OHS and workers welfare aspect.
- **Firefighting simulation.** Observation about condition the firefighting facilities and equipment and preparedness.
- **Landfill Block F41/42.** Observation related environmental aspect.
- **Subsidence pole and piezometer Block CB/E6c.** Observations and interviews regarding the management and monitoring of peat areas.
- **Harvesting. Block F27B Division 3.** Observation and interview with harvester related fruit ripeness, safe working practices and also worker welfare.
- **Manuring. Block C37 Division 2.** Observation on safe working practices and interview with the manuring workers related type of fertilizer use according to the procedure and also worker welfare.
- **Spraying. Block F42 Division 4.** Observation on safe working practices and interview with the spraying workers related type of pesticides use according to the procedure and also worker welfare.
- **IPM (Pheromone trap). Block E36. Division 3.** Observation related integrated pest managements.

Semeru Estate

- **HCV Forest area and Springs. Block G38.** Observations on HCV management and area boundary marking
- **Talang River Riparian. Block G41.** Observations and interviews regarding river border area management

- **Occupational area. Block H16.** Observations on land tenure by other parties within the company's area
- **HCV Springs and reservoirs. Block 132A/B and Block 133.** Observations and interviews regarding the management of HCV areas
- **Subsidence pole and piezometer. Block H17/H18.** Observations and interviews regarding the management and monitoring of peat areas.
- **HGU Pole No. 75 and No. 83.** Observations regarding marking of boundary markers and separated between certified and uncertified area
- **Employee Housing.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, educational facilities, religious facilities, health facilities and sports facilities.
- **Engine room.** Observations and interviews related to operations, understanding of emergency response, OSH aspects and employment.
- **Day care facility.** Observation about facility and interview about worker welfare, gender committee, and facility for worker.
- **PPE Storage.** Observation about facility and PPE stock
- **Agrochemical storage.** Observation about storage condition, agrochemical stock, OHS implementation, and interview with 1 worker about worker welfare, OHS implementation, and understanding of work procedure
- **Hazardous waste storage.** Observation about storage condition, hazardous waste stock, emergency response facility, and waste management.
- **Fertilizer storage.** Observation about storage condition, fertilizer stock, and OHS implementation.
- **Block H18b Division 4 (2 harvester).** Observation and interview with harvester related fruit ripeness, safe working practices and also worker welfare.
- **Block I27b Division 3 (4 Fertilizer Applicator).** Observation on safe working practices and interview with the manuring workers related type of fertilizer use according to the procedure and also worker welfare.
- **Block H39a Division 3 (5 Pesticide Applicator).** Observation on safe working practices and interview with the spraying workers related type of pesticides use according to the procedure and also worker welfare.
- **Pheromone trap H18b Division 4.** Observation related integrated pest managements.

Bromo Estate

- **Harvesting. Block I41 Division 1.** Observation and interview with harvester related fruit ripeness, safe working practices and also worker welfare.
- **Manuring. Block J32 Division 2.** Observation on safe working practices and interview with the manuring workers related type of fertilizer use according to the procedure and also worker welfare.
- **Spraying. Block J23 Division 3.** Observation on safe working practices and interview with the spraying workers related type of pesticides use according to the procedure and also worker welfare.
- **Barn owl Box. Block J22. Division 3.** Observation related integrated pest managements.
- **Fuel Tank.** Observations related to material handling, OHS and environmental management.
- **Fertilizer storage.** Observation about storage condition, fertilizer stock, and OHS implementation.
- **Employee Housing.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, educational facilities, religious facilities, health facilities and sports facilities.
- **Daycare facility.** Observation about facility and interview about worker welfare, gender committee, and facility for worker.
- **PPE Storage.** Observation about facility and PPE stock.
- **Agrochemical storage.** Observation about storage condition, agrochemical stock, OHS implementation, and interview related worker welfare, OHS implementation, and understanding of work procedure.
- **Firefighting tower Block J23.** Observation about condition the firefighting facilities and equipment.
- **Engine room.** Observations and interviews related to operations, understanding of emergency response, OSH aspects and employment.
- **Water reservoir.** Observation about water stock for employee housing and related to environmental aspect.

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

	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT EHP and PT BLP was held by:</p> <ul style="list-style-type: none"> • Public Notification on website on MUTU Website on 02 May 2022 • Public consultation with NGOs (by email) such as WALHI, WWF, and Sawit Watch on 31 May 2022 • Public consultation meeting with government institution 7-9 June 2022 • Public consultation meeting with communities on 7-9 June 2022 • Public consultation meeting with internal stakeholders and contractor 7-9 June 2022
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 Eagle High Plantations POM – PT Eagle High Plantations, subsidiary of Eagle High Plantations Tbk. operation consisting of one (1) mill and three (3) oil palm estates.

During the assessment, there were four (4) Nonconformities were assigned against Major Compliance Indicators and seven (7) opportunity(s) for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective action(s) that had been reviewed and accepted by Auditor(s) in form of documentation evidence(s) e.g. Those corrective action(s) taken that consist of four (4) Major non-conformity(s) had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Eagle High Plantations POM – PT Eagle High Plantations, subsidiary of Eagle High Plantations Tbk. complied with the requirements of **RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, endorsed by the RSPO Board of Governors on 12 November 2020 and Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th April 2020.**

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
<p>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.</p>		
<p>1.1.1 The company has the SOP-OTH-F3-020 procedure regarding requests and the provision of information on January 10, 2019. The procedure explains whether information can be accessed or not, including:</p> <ul style="list-style-type: none"> • Accessible documents such as: AMDAL Documents, company annual reports, company policies, monthly plantation & mill production reports; the operational area of the factory plantation along with maps, river maps, company organizational structure, HCV Report & Management Plan; SIA report; magazines, tribunes or company bulletins, monitoring plantation statistics, company employee data, data on the use of foreign workers and SOPs for all departments. • Documents that can be accessed with the approval, such as: Deed of establishment and deed of company change, company profit/loss, company balance sheet, non-staff salary, identity of operational leaders, staff & employees; list of company assets; register of land/plantation business land; community development (CD) plan; land acquisition payment data; complaints & complaints; map of distribution of endangered species in conservation areas; data on the use of plasma funds; 3rd party donations; CPO sales data; implementation of corporate CSR; plasma production data and SHP map files. <p>1.1.2 The company shows the procedure No SOP-OTH-F3-020 version 4 which is valid on January 10, 2019 regarding requests and providing information which explains the mechanism for requesting information and a list of accessible documents such as AMDAL, company annual report and organizational structure, are as follows:</p> <p><u>Compliance with Social and Environmental Regulation</u> The unit of certification can show evidence that information has been received in an appropriate form and language related to stakeholder involvement, company rights and obligations that are conveyed to all relevant stakeholders, including:</p> <ul style="list-style-type: none"> • Evidence of the RKL-RPL Report of PT EHP Bedaun Mill unit and PT BLP Semester 2, 2021 which was reported to the Environmental Service of Kotawaringin Barat Regency and Central Kalimantan Province on 17 March 2022. 		

- Evidence of the RKL-RPL Report of PT EHP Bedaun Mill and PT BLP Semester 2, 2021 which was reported to the Ministry of Environment and Forestry on March 31, 2022 with ID TTE 1648725606-3331.
- Evidence of Hazardous and Toxic Waste Management Reports from PT EHP Bedaun Mill unit and PT BLP Quarter IV, 2021 which was reported to the Horticultural and Plantation Office of Kotawaringin Barat Regency on January 20, 2022.
- Evidence of Hazardous and Toxic Waste Management Report of PT EHP Bedaun Mill unit and PT BLP Quarter IV, 2021 which was reported to the Ministry of Environment and Forestry on March 31, 2022 with ID TTE 1648726056-3331.
- Evidence of Hazardous and Toxic Waste Management Report of PT EHP Bedaun Mill unit and PT BLP Quarter IV, 2021 which was reported to the Environmental Service of Kotawaringin Barat Regency on March 31, 2022 with ID TTE 1648725877-3331.
- Evidence of Hazardous and Toxic Waste Management Reports from PT EHP Bedaun Mill unit and PT BLP Quarter IV, 2021 which was reported to the Environment Agency of Central Kalimantan Province on March 31, 2022 with ID TTE 1648725824-3331.
- Evidence of reports on the results of monitoring the existence of protected plants and animals as well as HCV management for semester 2 of 2021 and has been reported to the BKSDA of Central Kalimantan Province on 13 May 2022.
- Report on land use title utilization along with plantation business appraisal report for the first quarter of 2022 on 17 May 2022 to the Head of the Central Kalimantan Province Plantation Service and the Head of the West Kotawaringin Regency Plantation Service and the Head of the West Kotawaringin Regency National Land Agency.
- Investment Activity Report for 2022 for the first quarter of April 11, 2022 with business activity code 1043 and business field 10431.

Compliance with Work welfare Regulation

Certification unit in general has complied with manpower regulation, including Reporting of Employment Report for PT KGP in 2021 via online on November 24, 2021 and must be reporting back on November 24, 2023.

Compliance with BMP Regulation

Evidence of the First Quarter 2022 Plantation Business Development Report reported to the West Kotawaringin Regency Plantation Service on 17 May 2022.

Compliance with Legal Regulation

- Report on the utilization of *HGU* to Land Agency of Kotawaringin Barat on 12 July 2021 for the year 2020. Reporting for the 2021 period will be carried out in the second semester of 2022
- Online Investment Activity Report for the first quarter of 2022

Based on the results of document review and interviews with agencies, such as the Agriculture Agency of Kotawaringin Barat District, the Environment Agency, and the Manpower Agency, it is known that the information presented by the certification unit has been presented in an appropriate language and can be accessed by the agency. In addition, based on the results of interviews with village heads, for example in Sungai Bedaun Village, it is known that information is presented in an appropriate and accessible language, including through short messages or WhatsApp applications, such as information on job vacancies. On the other hand, the company cannot show the registration of daily workers as stated in Government Regulation no. 35 of 2021. This has become a record of non-compliance with indicator 2.1.1.

1.1.3

The company has the SOP-OTH-F3-020 procedure regarding requests and the provision of information on January 10, 2019. The procedure explains that every request for information must be responded to by the company within 7 working days after the company receives the request letter from the applicant. Records of requests for information are recorded in the incoming and outgoing mail book and their responses.

Based on the study of logbook documents incoming and outgoing letters in 2021 there were no incoming letters related to requests for information but incoming letters were more to requests for assistance and sending student interns. In its implementation, the company has recorded every incoming letter and its response along with the date in the company logbook. The company showed a response from the incoming letter sample sending the name of Head of Sungai Bedaun Village on June 3, 2021 with No. Letter 124/DSB/V/2021 regarding request for heavy machine and has been accepted and responded on June 5, 2021.

1.1.4

The company has the SOP-OTH-F6-001 procedure regarding external communication on March 5, 2020. the procedure explains that

the corporate secretary is responsible for providing information to strategic partners, potential strategic partners, stakeholders, business partners, and shareholders.

The company has carried out socialization related to the procedure on February 7-11, 2022. The socialization activities include Company regulations, Health and Worker assurance, Minimum wage period 2022, Code of Ethics, and Submission of complaints to the Company (including related to requests for information).

Interviews with the District Government Agency, Labor Union-Bipartite Cooperation Institutes, Village Representatives around, it is known that they understand how to communicate and consult with the company as well as the PIC who is responsible for communicating and consulting.

1.1.5

The company has list of stakeholders 2022, which informs the name of the institution/institution, contact person name, position, cellphone number, and address. The list of stakeholders consists of indigenous peoples and community leaders, institutions (apparatus) and related institutions, relevant government agencies. The listed contact is exist and has been verified randomly during public consultation activity

Status: Comply

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

1.2.1

The Company demonstrated the 2018 code of conduct standard which was approved by the Chief Executive Officer which became effective on December 6, 2017 with the aim that EHP is committed to implementing high ethical standards for the Board of Commissioners, Board of Directors & Management, Employees, Customers, Suppliers ; Consumer; Government & Society in the environment where the EHP Group operates and understand the important principles in running the business which are used as guidelines in maintaining and building the reputation of the EHP Group as a business partner, employer, supplier and part of the responsibility and trust of the company. The policies presented include; Compliance with laws, regulations & company policies; ethical business conduct & fair relationships; conflict of interest; health, safety & Environment; company property & assets; job performance; Human rights and political activity. Implementation of the code of ethics such as violation of the code of ethics; reporting violations; compliance statement & communication & consulting.

The company has socialized the code of ethics policy on January 12, 2022, as was carried out at Arjuna Estate Division 2 with a total of 62 participants. Socialization activities include company regulations, company vision and mission, Code of Ethics, submission of complaints to companies (including those relating to requests for information) and sustainability policies.

1.2.2

The company has a system to monitor compliance and implementation of these policies, as well as ethical business practices, namely SOP – OTH – F3 – 019 Version 2.0 about Complaint Handling which has been in effect since January 10, 2019. The procedure describes several types of complaints, including:

- Employment complaints
- Non-work complaints
- Community complaints
- Customer complaints
- Another complaint.

This SOP also explains that the company guarantees the confidentiality of the reporter or the reporter. Based on the results of interviews with management, there is no evidence of violations of the company's ethical behavior practices, such as bribery or nepotism. The mechanism has been effectively implemented proven by the absence of problems related to the code of conduct and understanding by stakeholders based on the results of public consultations

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

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

2.1.1

The Bedaun POM certification unit is under PT EHP, while the plantation area is under PT BLP. In fulfilling compliance, the company has complied with all relevant laws and regulations, namely by having the following documents:

Compliance with Social and Environmental Regulations:

- The company already has UKL-UPL Addendum documents on behalf of PT BLP and PT EHP for Plantation activities covering an area of 9,501.12 Ha and Palm Oil Processing with a capacity of 60 Tons of FFB/hour which has been approved by the Environmental Agency of Kotawaringin Barat Regency Number 660/89/ BLH.III/II/2016 dated 22 February 2016. The addendum is related to the expansion of the area from 560 Ha to 9,501.12 Ha and an increase in production capacity from 45 Tons of FFB/Hour to 60 Tons of FFB/Hour. Related to PermenLH Number 5 of 2012 concerning Types of businesses and or activities that are required to have an AMDAL. The RKL-RPL addendum document has been approved by the Regional AMDAL Assessment Commission of Kotawaringin Barat Regency Number 660/84/BLH.III/II/2016 dated 22 February 2016.
- The company also has an Environmental Permit based on the Decree of the Kotawaringin Barat Regent Number 660/05/BLH/II/2016 dated 23 February 2016. The Environmental Permit is issued based on the 2016 UKL-UPL Addendum document.
- Hazardous and Toxic Waste Management Permit for PT EHP Bedaun Mill unit based on the Decree of the Kotawaringin Barat Regent Number 660/6/DLH.IV/TPS//IV/2016 dated 12 April 2016 which is valid for 5 years from the date of stipulation. It is an OFI in previous audit, and became an OFI again in this audit after few verifications and interview with related stakeholders.
- Hazardous and Toxic Waste Management Permit for PT BLP based on the Decree of the Kotawaringin Barat Regent Number 660/538/DLH.3/IV/2020 dated 21 April 2020 which is valid for 5 years from the date of stipulation.
- Wastewater Utilization Permit for Land Application for PT EHP based on the Decree of the Head of the Environmental Agency of Kotawaringin Barat Regency number 503/004/LH/DPMPSTSP.D dated March 13, 2020 which is valid for 5 years from the date of stipulation.
- The company already has a Surface Water Intake and Utilization Permit for PT EHP Bedaun Mill unit based on the Decree of the DPMPSTSP of Kotawaringin Barat Regency Number 503/0001/IPPAP/DPMPSTSP.D on 27 May 2019 and is valid for 3 years. In the document there is a provision for a quota of surface water intake of 25,000 m³/month
- Based on the results of the review of the Surface Water Intake and Utilization Permit No. 503/0001/IPPAP/DPMPSTSP.D dated 27 May 2019 which is valid for 3 years and the Hazardous Waste Storage Permit Document No. 660/6/DLH.IV/TPS//IV/2016 dated 12 April 2016 which is valid for 5 years. This indicates that both permits have expired. However, the company can show evidence of processing the extension of the permit document, and until the time the audit is carried out there are still obstacles due to changes in the licensing management mechanism based on Law Number 11 of 2020 regarding Job Creation and Government Regulation Number 22 of 2021 regarding the Implementation of Environmental Protection and Management. Based on this, the company has the opportunity to ensure that the licensing extension process continues, and to document the entire process. **(OFI)**.

Compliance related Legal Aspect

- Already has land use title covering an area of 7,576.48 Ha and building use title covering an area of 64.52 Ha.
- Already has a plantation business permit for an area of ± 7,500 Ha with a capacity of 60 Tons of FFB/Hour and plantation business permit – for cultivation for an area of ± 1,400 Ha as described in more detail in indicator 2.1.1
- Already has plantation business permit – for processing with a capacity of 45 Ton FFB/Hour
- Already have the results of a plantation business assessment for either mill or estate

A more detailed explanation regarding compliance with regulations related to legal aspects is explained in indicator 4.4.1

Compliance with regulations related to operator licenses

- Boiler Operators
 - Based on field visits and interviews with mill workers, it is known that mill has a boiler with a capacity of 50 tons/hour.
 - From the SIO operator list, it is known that there are 2 employees who have attended class I boiler training.
 - Permenaker No. 01 of 1988, in Appendix 1 it is explained that for a boiler capacity of >40 T/h - <60 T/h, it requires 1 class I operator and 2 class II operators for each shift.
 - Based on the list of mill employees, it is known that there are a total of 6 employees in charge of operating boiler machines which are divided into 2 work shifts (3 people/shift) so that there should be 2 class I boiler operators and 4 class II boiler operators.
- Generator Operators

- Permenaker No. 38 of 2016 in Articles 110, 111 and Table E it is explained that for a prime mover engine with a power of > 214.47 HP or 200 kVa, it must have a generator operator in each shift.
- Based on field visits and interviews with mill workers, it is known that mill has 3 generators with a capacity of 335 kVa and 355 kVa with operating status and 605 kVa with damaged status which are operated by operators with 3 shift changes.
- The company shows the entire list of mill employees' SIO, which includes 2 employees for 2 shifts who have attended generator operator training, but the SIO of 1 employee on the third shift has not been shown.
- Based on field visits and interviews with plantation workers, it is known that Bromo and Semeru Estate have a generator with a capacity of 250 kVa and Arjuna Plantation with a capacity of 350 kVa, but the company has not been able to show the SIO of the operator operating the three generators.
- Heavy Equipment Operators
 - Permenaker No. 9 of 2010 article 5 paragraph 1 states "heavy equipment must be operated by heavy equipment operators who have OHS permits and work books according to their type and qualifications".
 - Based on a field visit at Arjuna Plantation Division 1 Block C41, it was found that a worker with the initials BP was operating a Backhoe Loader.
 - The company shows the entire list of SIO employees of the Plantation, but has not been able to show the SIO for heavy equipment operators with the initials BP.

Compliance with regulations related to Worker Welfare (Contract Worker Registration)

- The document registering the workers of PT Eagle High Plantation and PT Bumilanggeng Perdanatrada for the period of May 2022 it is known that there are 578 workers with fixed time employment agreement status.
- Government regulations No 35 of 2021 → fixed time employment agreement can be done with a daily work agreement. The fixed time employment agreement must be registered by the entrepreneur at the ministry that organizes matters in the field of manpower online no later than 3 (three) days from the signing of the fixed time employment agreement. In the event that the online fixed time employment agreement registration is not yet available, then the fixed time employment agreement registration is carried out by the entrepreneur in writing at the office that carries out government affairs in the Regency/City Manpower sector no later than 7 (seven) working days from the signing of the fixed time employment agreement.

Based on the description above, it can be concluded that:

1. The company has not been able to show sufficient evidence that it has sufficient number of licensed operators in accordance with the regulations (4 class II steam aircraft operators, 4 power and production aircraft operators and lift and transport aircraft operators for employees with initials BP).
2. The company has not been able to show sufficient evidence that it has registered PKWT workers as stated in PP35 of 2021.

It became **Non-conformity No.2022.01**

2.1.2

The unit of certification has a list of legal regulations contained in the Summary and Review of Conformity with Regulations and Legislations and Other Requirements. The regulations cover aspects of agribusiness, employment, environment, and other regulations related to the company operational activities last update on 6th June 2022 i.e:

- Government regulations No. 35 of 2021 concerning Specific Time Work Agreements, outsourcing, working hours, rest periods, and layoffs
- Government regulations No 36 of 2021 concerning Wages
- Government regulations No 37 of 2021 concerning Job Loss Guarantee
- Regulation of environmental ministry No. P.12 of 2020 concerning Storage of Hazardous and Toxic Waste
- Regulation of the Minister of Manpower number 4 Of 2022 concerning payment procedures and terms for "Jaminan Hari Tua"

Evaluation of law registers for contractors, such as CV Hosana and Ponidin which have been implemented on Feb 2022. Explanation on contractor compliance is explained in more detail in 2.2.2. In addition, an internal RSPO audit has also been carried out to ensure contractor compliance with regulations by March 2022

2.1.3

The company has a land use title stake maintenance and monitoring procedure (SOP-TS-001) which states that stake monitoring and

maintenance is carried out once a year by a GIS assistant. It has been shown a map of land use title stakes with a scale of 1: 80,000 which contains information including the total number of stakes totaling 82 pieces with the following details:

- ARJE : 42 poles
- SMRE : 15 poles
- BRME : 25 poles

The last monitoring and maintenance of the stakes was in June 2022 with the results of the monitoring stating that all of the stakes were in good condition. Based on the results of field visits to block G18A and block G23B SMRE to see the condition of stakes No. 75 and No. 83, it is known that the condition of stakes is in accordance with the results of monitoring. Similar results were also found for BPN 18 and BPN 40 in BRME.

2.1.1	Status: Non-conformity No.2022.01
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2.2 All contractors providing operational service and supplying labour, and Fresh Fruit Bunch (FFB), comply with relevant legal requirements.

2.2.1
List of contractors is presented in document "List Contractor 2022", which informs contractor's name, type of activity, location of activity, owner's name and etc. Currently, unit of certification has 15 contractors/suppliers which consist of FFB Suppliers, transporter (CPO, PK, FFB, Hazardous Waste) and building construction contractor.

2.2.2
All contracts, including contracts with FFB suppliers, have separate clauses regarding the fulfillment of relevant legal obligations, as stated in the Carriage of Agreement, number 001/TRANS/EHP-SPK-BEST/CPO/VIII/2021 between PT EHP and CV Berkah Era Surya Tama Article 21, which among other things explains that ensuring the actions of the second party (contractor) are in accordance with the statutory requirements in the field of manpower, OHS, environment and other legalities.

Based on the results of field observations, it is known that there are contractor workers who still do not get health and worker insurance facilities. In this regard, the company has evaluated third party contractors. In general, the fulfillment of relevant legal obligations is quite diverse, such as comply with the minimum wage and provision of PPE, but the related fulfillment regarding the provision of health and worker insurance facilities, the legality of business entities, and etc. still in progress.

Based on interviews with the management unit, it is known that the company will continue to coordinate and socialize third parties regarding the fulfillment of relevant legal obligations.

2.2.3
All contracts, including contracts with FFB suppliers, have separate clauses that prohibit practices involving child labour, forced labor, and workers from trafficking in persons, as stated in the Carriage of Agreement, number 001/TRANS/EHP-SPK-BEST/CPO/VIII/2021 between PT EHP and CV Berkah Era Surya Tama article 21, which among other things explains that ensuring the actions of a second party (contractor) are in accordance with the requirements for paying minimum wages, prohibiting the use of child labor, prohibiting forced labor practices, protection/ health and work accident insurance/ insurance, protection of reproductive rights of female workers, right of access to conduct evaluations, etc.

Based on interview with third party representative as mentioned above, it was known that socialization towards pursuance regulation on safety and manpower has delivered during contract agreement.

	Status: Comply
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2.3 All FFB supplies from outside of the unit of certification are from legal sources.

2.3.1 and 2.3.2
Based on the document review, it is known that Bedaun Mill received FFB from 15 third-party collectors. At the time of the assessment, information regarding the identity of the land owner, the geolocation of FFB origin and the status of land ownership for collectors on behalf of Ponadin and Edi Effendi was shown. Meanwhile, the same information is not yet available for the other 13 collectors. The company representative explained that for other collectors, they are still in the process of identifying and tracing FFB sources and are

targeted for completion in 2022. Thus, the company has the opportunity to ensure the identification and traceability process of FFB sources from all FFB suppliers can be carried out in accordance with the stipulated timeline. **(OFI)**

Direct supplier :

- Ponadin
- Edi Efendi
- H.Salman

Indirect supplier :

- CV Hosana
- CV MBU
- CV APT
- CV Arut Permai
- CV Sudar Mustakim
- CV PP
- CV Karya Bersama
- KUD Tani Subur

Status: Comply

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

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

3.1.1
The company has a long-term plan of 5 years as stated in the Five-Year Projection documents of PT Bumilanggeng Perdana Trada and PT Eagle High Plantation (EHP POM) for 2019 – 2023. The document describes FFB production, CPO and PK production, OER, KER, selling prices FFB, CPO and PK selling prices, maintenance costs, revenue, and net profit are as follows:

Description	Unit	Years				
		2019	2020	2021	2022	2023
FFB	Ton	227,68	251,50	272,43	278,04	276,88

An annual evaluation is available for each management unit in the Annual Report containing information on production, yield improvement, expenditure to date, proportional estimates, initial estimates and reasons for over/under spending.

3.1.2
Based on the company's area statement, the planting year owned by the company was between 1997-2014 and the company also showed a replanting program that was approved by the COO on February 14, 2019, which included the replanting program from 2024-2028, namely:

Plan Replanting (Year)	Estate (YOP)		
	Arjuna	Semeru	Bromo
2024	1997	1997	-
2025	2025	1998	1998
2026	-	1999	1999
2027	-	2000	2000
2028	-	2001	2001

The replanting plan has also been discussed at the annual meeting, which is listed in the 2021 annual reports of PT EHP and PT BLP.

3.1.3
The company routinely conducts evaluations, including management evaluation which is carried out once a year to evaluate the achievement of targets in one year and once a month to evaluate the achievement of monthly targets as shown in PT BLP's January

2022 management review document which includes an evaluation in 2021 and a management review in April 2022. PT BLP which includes an evaluation in March 2022, with the following agenda:

- Internal audit results
- Customer feedback
- Process performance and product conformity
- Status of preventive and corrective actions
- Follow-up of management review
- Changes that may affect the management system
- Recommendations for improvement
- When is the management review conducted
- Are there meeting minutes
- How are the results of the review
- Has the action been implemented

From the results of the management review, the company then makes a work plan from the results of the evaluation to be carried out in the next period.

	Status: Comply
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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 certification unit already has a system to improve existing practices, in accordance with the latest information and techniques as well as a socialization mechanism for all workers following current technological developments. The unit of certification also develops guidelines for farmers by providing systematic training for continuous improvement. Some of the evidence that has been applied for continuous improvement include:

Social and Environmental Aspect

- The company no longer uses pesticides with the active ingredient paraquat.
- The company has implemented biological pest control in this case by using host plants and barn owls to reduce the use of pesticides, especially insecticides and rodenticides.
- Management and monitoring of fires in company border areas that benefit the community.
- The use of renewable energy according to reduce the use of fossil fuels.
- Waste management and monitoring through WWTP pond management, testing the quality of the effluent and reporting it to the Environmental Agency.
- Air quality management and monitoring through several actions such as road maintenance, air quality testing, routine maintenance of vehicles and machines and vehicle upgrades.
- Management and monitoring of surface and groundwater through testing the quality standard.
- Green House Gas Management and using land clearing with mechanical and zero-burning policy.
- Drilling wells to meet the needs of clean water provided for each emplacement.

RSPO Internal Audit

The last time it was carried out was March 2022 with the result that there were 18 nonconformity, for example

- 2021 HCV evaluation and monitoring
- Have not shown proof of payment of PBB, PPN, and PPH21
- Haven't filled out the metric template
- Haven't shown the agreement letter for FFB third party supplier and proof of payment

With these nonconformity, the company made gradual improvements and up to 03 June 2022, 9 of the 18 non-conformities have been met, such as the 2021 HCV evaluation and monitoring. Meanwhile, 9 other non-conformities are targeted to be met when the external audit assessment is carried out.

Best Management Practice

The company has also shown an internal memo from the Head of Applied Research & Technical Services number: 5.023/ARTS-COO/RSPO/Herbicide/III/20 dated March 9, 2020 regarding herbicides to replace the active ingredient paraquat. Based on the pesticide use document for the period 2020 and 2021, it is known that since the internal memo was issued there has been no use of pesticides with the active ingredient paraquat for controlling fern weeds.

3.2.2

Certification Unit already has an annual report document using the RSPO metric template format that has been provided to the auditor team at the time of the assessment. The summary in the report, for example, is as follows:

Name of RSPO Member	:	PT Eagle High Plantation Tbk
RSPO Membership Number	:	1-0048-08-000-00
Name of Certified Unit	:	Eagle High Plantation POM
Name of Certification Body	:	PT Mutuagung Lestari
RSPO PalmTrace ID Number	:	RSPO_PO1000004234
Number of Mills	:	1
Number of Estates	:	3
Production Area (ha) - Estate	:	8,262.48
Certified Area (ha) - Estate	:	8,711.54
High Conservation Value (HCV) Area (ha)	:	356
Peatlands - Planted (ha)	:	4,474
Peatlands - Unplanted (ha)	:	0
Freshwater Usage per PO produced tonne	:	8.88
Average LTIFR	:	18,02
Total Workers	:	100
% of Local Workers of Total Workers	:	100%
% of Non-Local Workers of Total Workers	:	0%
% of Contract Workers of Total Workers	:	36%
% of Female Workers of Total Workers	:	34%
% of Young Workers	:	0%

Status: Comply

3.3
Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1
The company has a list of work procedures that apply to all subsidiaries of PT Eagle High Plantation, for example as follows:

Agronomy Procedure

- MAN-UOM-001 on agronomic technical guidelines which among other things explain:
 - Chapter II on oil palm nurseries
 - Chapter III on land clearing
 - Chapter IV on oil palm cultivation
 - Chapter V on weed control
 - Chapter VI on fertilization
 - Chapter VII on pests and diseases
 - Chapter VIII on guidelines for the use of agricultural chemicals
 - Chapter IX on road maintenance, ditches and water management, bridges and culverts
 - Chapter X on pruning
 - Chapter XI on boundary marking, census and identification of principal
 - Chapter XII on harvest preparation
 - Chapter XIII on harvesting and transportation
 - Chapter XIV on the utilization of mill waste
 - Chapter XV on environmental sustainability
- SOP-EHP-AGR-13 on peatland water management.

MILL Procedure

- SOP-MO-001 regarding mill operations, which consist of:
 - Chapter A is SOP-UOM-MO-001 regarding FFB acceptance
 - Chapter B is SOP-UOM-MO-002 regarding CPO and PK production
 - Chapter C is SOP-OTC-003 regarding the delivery of CPO and PK
 - Chapter D is SOP-UOM-MO-004 on cleaning CPO storage tanks
- SOP-EHP-Mill-10 on Nonconformity Control.
- Work Instruction-Mill-01 on weighbridge
- Work Instructions -Mill-08 about kernel factory

Based on the document review, it can be concluded that the existing procedures cover all processes and activities in the plantations and factories and are placed in special cabinets. In addition, the procedure also includes the effective date of the procedure and approval from management, for example the SCCS procedure with the number SOP-OTH-F3-022 regarding the Supply Chain of Raw Materials and Production dated January 10, 2019 which was approved by the CEO.

Based on interviews with spray workers, it can be concluded that workers have an understanding of the procedures applied in the company, as well as regular socialization related to company procedures.

3.3.2

The company carries out an internal operational audit as stated in the Problem Identification Corrective Action document which explains the consistency checks of management implementation of company procedures that are carried out regularly on plantations and mills, as was the last time at Bromo Estate on June 6, 2021 with 6 non-compliance results. The findings have been corrected until July 1, 2021.

3.3.3

The company has shown the documents for the implementation of internal audit activities as a form of monitoring the implementation of the standards owned by the company. The internal audit activities were carried out in the period July 2021 for PT EHP and PT BLP. Based on the document, it is known that there are each finding. The company has also shown improvement from each of these findings.

In addition, the company has also shown documents on the implementation of the RSPO internal audit which was carried out from April 4-8, 2022. Based on these documents, 18 findings of non-compliance were found, the latest being on April 29, 2022.

	Status: Comply
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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 already has several documents related to social and environmental impact studies that are carried out independently or participatively by involving affected stakeholders in collaboration with accredited independent experts. Some of the documents held by the unit of certification are as follows:

Environmental Impact Assessment (EIA)

Unit Certification Bedaun Mill is under the company PT EHP and PT BLP, the company already has an Environmental Impact Assessment (EIA) document that has covered all areas that fall within the scope of certification and can be proven based on the following documents:

- The company already has UKL-UPL Addendum documents on behalf of PT BLP and PT EHP for Plantation activities covering an area of 9,501.12 Ha and Palm Oil Processing with a capacity of 60 Tons of FFB/hour which has been approved by the Environmental Agency of Kotawaringin Barat Regency Number 660/89/ BLH.III/II/2016 dated 22 February 2016. The addendum is related to the expansion of the area from 560 Ha to 9,501.12 Ha and an increase in production capacity from 45 Tons of FFB/Hour to 60 Tons of FFB/Hour. Related to PermenLH Number 5 of 2012 concerning Types of businesses and or activities that are required to have an AMDAL. The RKL-RPL addendum document has been approved by the Regional AMDAL Assessment

Commission of Kotawaringin Barat Regency Number 660/84/BLH.III/III/2016 dated 22 February 2016.

- The company also has an Environmental Permit based on the Decree of the Kotawaringin Barat Regent Number 660/05/BLH/I/2016 dated 23 February 2016. The Environmental Permit is issued based on the 2016 UKL-UPL Addendum document.

In the document above, there is information related to environmental aspects and parameters that must be monitored and managed along with information on targets and implementation times contained in the RKL-RPL matrix. The document has also covered all aspects of plantation and mill activities and their changes throughout the operational activities. The sampling methodology used is also participatory involving external stakeholder groups for the purpose of identifying impacts. Based on the verification of these documents, it can be concluded that all environmental impacts from plantation activities have been identified and their management recommended with reference to relevant laws and regulations.

Social Impact Assessment (SIA)

The company already has a social impact identification document, namely the Social Impact Identification Study of Plantations and Palm Oil Mills (SIA) of PT EHP and PT BLP, 2013. The study was conducted in June 2013 by Sonokeling involving affected parties as evidenced by a socialization meeting / Public Consultation Social Impact Assessment (SIA), on June 17, 2013 with 76 participants consisting of representatives from surrounding villages and sub-districts, community leaders and representatives from companies. Evidence of community involvement in the form of attendance lists, photos of implementation and examples of questionnaire attachments are included in the SIA document. The assessment method is carried out using a list of questionnaires that have been prepared through an interview system and measurable data collection.

The SIA study explains the impacts arising from plantation activities, including population, education, livelihoods, income, health, facilities and infrastructure, customs and culture of the villagers around the company, environmental management efforts in the social, economic and cultural fields as well as perceptions community about the existence and benefits of PT EHP and PT BLP. Social impact assessments are included as part of the complement of all environmental impact assessments. Evidence of participation with affected parties is shown in the form of attendance at FGD meetings and photos during interviews. The report also contains a matrix of Social Management Plan and Social Monitoring Plan which contains recommendations for managing identified social impacts.

The types of data collected are primary data and secondary data. Primary data collection for monitoring the management of social impacts is obtained from relevant stakeholders as affected parties as well as local village officials who represent the community and as verifiers. Secondary data or indirect data collection is carried out by means of literature studies through various references such as environmental assessment documents, HCV assessment documents, local government literature, CSR implementation records, company internal data, correspondence between companies and affected parties, local news and news. national and so on. All of these data sources are used as consideration for social impact management recommendations. Based on the verification of these documents, it can be concluded that all social impacts of plantation activities have been identified and their management recommended with reference to relevant laws and regulations.

High Conservation Value Assessment (HCVA)

The certification unit has also conducted studies related to areas with high conservation value as evidenced by the 2013 HCV Study Results document conducted by Tropenbos International. The HCV assessment was carried out on 5 – 11 July 2012 for the scope of PT EHP and PT BLP as a whole, namely 1 Mill and 3 Estates covering an area of 8,750 Ha in accordance with the Location Permit. In the HCV document it is stated that the scope of the study is a HGU covering an area of 7,500 hectares but when a map verification is carried out, the scope of the study refers to the Location Permit, this was also confirmed by the company's GIS team which showed the scope area used in the HCV assessment was not based on HGU but rather a Location Permit. Based on the results of the HCV study, the HCV area was 355.15 Ha and the peat conservation area was 4,474.78 Ha.

This study explains the impacts arising from plantation activities on the environment, social, and protected flora and fauna. The HCV assessment also involves several affected parties, both internal and external stakeholders. Evidence of participation with affected parties is shown in the form of attendance at FGD meetings and photos during interviews. A public consultation was also conducted on July 10, 2012 which was attended by relevant stakeholders. The report also contains a matrix of High Conservation Value Area Management and Monitoring Plans which contains recommendations for the management of all identified HCV areas. Based on the verification of these documents, it can be concluded that all areas with high conservation potential and protected areas have been identified and their management recommended with reference to the relevant environmental management guidelines.

3.4.2

The certification unit has made efforts to manage and monitor social and environmental impacts that are carried out independently by involving affected stakeholders. Some evidence of documentation of activities that have been carried out are as follows:

Environmental Impact Assessment (EIA)

Based on the results of the verification of the RKL-RPL document for Semester 2 of 2021, it can be concluded that all the management and monitoring parameters requested in the environmental document matrix have been implemented. The certification unit has also evaluated every parameter of significant impact monitoring carried out as required in KepmenLH 45 of 2005, which includes evaluation of trends, evaluation of critical levels, and evaluation of compliance. Based on the results of the evaluation, it is known that there are several parameters that are not in accordance with the applicable Quality Standards, but the results of interviews, document analysis and observations there are no indications of environmental pollution in the area around the company, this is explained in each related indicator. The effectiveness of environmental management and monitoring can be seen from the results of the analysis and the compatibility between the management and monitoring plans and their implementation in the field. Several things can be concluded from the results of the review of the RKL-RPL document for Semester 2 of 2021, including:

- There is no test result value above the quality standard for the POME parameter applied to the land.
- There is no test result value above the quality standard for emission parameters, air quality and ambient.
- There is no significant decrease in peat water level.
- Increase socialization and supervision to avoid occupation of protected area areas.
- Utilizing solid waste from palm oil mills as a substitute for fertilizers and fossil fuels.
- Community Development activities for recruiting local communities as employees are considered effective enough to avoid social conflicts and control community unrest.

Based on the results of field observations in the EFB storage area, the WWTP area and the Water Intake area as well as the conservation area, there was no indication or potential for environmental pollution from the company's activities. The results of interviews with the community around the company also stated that they did not feel any environmental impacts related to the company's operational activities. The company has also carried out environmental management in accordance with the RKL-RPL by installing signboards for conservation areas, prohibiting land burning, planting local plants on canal borders and so on. Based on the results of interviews with sprayer and fertilization officers, they also stated that they were aware of the prohibition on the use of chemicals in locations close to water sources such as canals, reservoirs or artificial ponds.

The unit of certification has also made an RKL-RPL report every semester which refers to the environmental management and monitoring matrix. Environmental management reports are carried out every 6 months and submitted to the relevant agencies, for example the RKL-RPL Report for Semester 2 of 2021 which is sent to the Environmental Agency of Kotawaringin Barat Regency with proof of receipt dated March 17, 2022 which is equipped with a stamp, signature and name of the recipient as well as proof of document delivery notes. Based on the results of interviews with the Environmental Service regarding reporting on the implementation of RKL-RPL, the certification unit routinely does this and up to the time the audit was conducted there were no complaints or conflicts related to the environment from NGOs or local communities around the company.

Social Impact Assessment (SIA)

The 2013 SIA study results document is used as a guide in the preparation of social impact management programs which are updated annually, for example, the 2022 Environmental Management and Monitoring Plan with Affected Parties. In the document there are several social programs, including the provision of regular social assistance to the community surrounding areas, improving the economy through collaboration with companies, opening job vacancies, and improving welfare through community empowerment programs. Program planning is carried out based on the results of the Focus Group Discussion on December 31, 2021 for the scope of internal stakeholders and on December 21, 2021 for externals including the village community around the company. The results of the potential and risk analysis with evidence of documentation and attendance are attached to the minutes. The program is a general plan that will be implemented by the company based on the analysis of stakeholder needs and stakeholder mapping related to the company, either directly or indirectly. Thus, the planned program is directed as far as possible to strengthen the company's relationship, communication and cooperation with all stakeholders.

The company also evaluates the Management Plan every year to monitor the progress of program management, for example, there are programs that need to be stopped, continued or added. The evaluation of the management plan refers to the 2021 Social Impact

Management result document, the evaluation activity is also a reference in the preparation of the 2022 program. Based on the results of the 2021 Social Impact Management document verification, it can be concluded that all activities listed in the 2021 Social Impact Management Plan have been implemented. carried out. The document also includes social programs to avoid/mitigate negative social impacts, partnership programs for farmers, human rights, CSR programs, gender equality, education and public health. No new impacts have been identified by the company, so for the period of 2022, all programs that have been determined in the previous year are still continuing. However, regarding tenure issues that occur within the company's operational area, this has happened since the company was first opened and until now there has been no increase in the area of the occupation area. Basically, the occupation area is land owned by the community that does not want to be compensated and the company also does not try to own the land. This can be proven from the initiation of the release of the occupation area from the scope of certification.

Based on the results of consultations with the local village heads, it was also stated that the company was not trying to seize the occupied area and tended to give the area to the community. Assistance in making transportation access is also carried out to help the people who occupy the area so that there is never a social conflict between the company and the community. The results of interviews with management also stated that another form of assistance was carried out by establishing plasma plantations for surrounding villages.

Interviews with worker representatives also stated that there was no form of discrimination against workers, no underage workers were found, the company has also fulfilled the rights of its employees, several important facilities for employees have been provided by the company such as housing, water, electricity, places of worship, public facilities. educational infrastructure (schools), and other facilities. The company also allocates resources for the maintenance of the entire facility. The resource persons also stated that they can voice their views through their own representative institution or a spokesperson they choose in the evaluation activities to review and develop mitigation plans, as well as monitor the success of the implemented plans. However, there are social issues found from the results of field observations that have not been listed in the 2021 social management report, even though these issues have been managed properly by the company, such as the existence of areas that have not been compensated for, assistance with the evacuation of Orangutans entering the village area, and the issue of theft. This has become OFI in indicator 3.4.3.

3.4.3

The unit of certification has made efforts in implementing the management and monitoring of social and environmental impacts as described in indicator 3.4.2. In addition, the certification unit also makes efforts to periodically update the management in a participatory manner. Some documentary evidence of the efforts that have been made are as follows:

Environmental Impact Assessment (EIA)

The company involves the Environment Agency and the Ministry of Environment and Forestry to monitor the results of environmental management that has been carried out by the company in the form of presenting RKL-RPL reports and other environmental management documents sent every certain period which can be proven in indicator 1.1.2. The company also does not block access to all environmental agencies if they are going to carry out field verification to their management areas. It aims to obtain advice and advice in carrying out environmental management in accordance with the vision, mission and government programs so that they can run synergistically. This can be proven based on the results of interviews with the Kotawaringin Barat Regency Environmental Service who made field visits around December 2021 to carry out periodic monitoring. Monitoring and updating related to environmental impact management is also carried out in conjunction with an evaluation of HCV management which is described in more detail in indicator 7.12.4. However, in general, all recommendations from the evaluation of HCV management carried out in a participatory manner will be carried out in line with the management and monitoring of environmental impacts.

Social Impact Assessment (SIA)

Based on the analysis of the Environmental Management and Monitoring Review Report with the Affected Parties in 2021, the social impacts in this assessment are divided into social impacts, economic impacts and environmental impacts. The social impact assessment is carried out based on the perceptions of community representatives at the assessment location who represent the community. the company has analyzed the positive and negative impacts arising from each activity specifically, for example physical assets for production activities that have positive and negative impacts on both external and internal levels, and so on as described in indicator 3.4.2. The company conducts annual evaluations to harmonize data collection related to community perceptions regarding the SIA Management Plan and adjust it to the latest needs according to conditions in the field.

As of December 31, 2021, the company has reviewed the management of social impacts for the period 2021 and developed a social

management plan for the period 2022, in which the process has been participatory by involving relevant stakeholders. In the review activity, the company applied the 7 principles of the RSPO regarding the development of plantations that are responsible for social and environmental aspects by referring to the Free, Prior, Informed and Consent (FPIC) Principles. The principle of FPIC which is the basis for the company in carrying out the process of developing oil palm plantations, among others, involves women's representatives, village heads, land owners around the company's area, independent smallholders, and all affected parties. The review activities were limited due to the Covid 19 Pandemic. However, based on the verification of documents related to EIA and SIA, the following information was obtained:

- The company has compiled the RKL-RPL document as regulated in the Ministry of Environment Decree No. 45 of 2005 concerning Guidelines for the Preparation of RKL-RPL, but the document has not discussed comprehensively and thoroughly regarding the management and monitoring that has been carried out.
- The company has managed the SIA which can be proven in the 2021 SIA Realization Report and Management Review document, in the document it has also explained all the programs determined for 2021. However, the document has not explained comprehensively and thoroughly related to social issues identified and/or carried out during the program period.

Based on this, companies are encouraged to compile more comprehensive RKL-RPL and SIA reports related to all environmental and social management activities. **OFI**.

Status: OFI at Indicator 3.4.3

3.5

A system for managing human resources is in place.

3.5.1

The certification unit has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Company Regulation period 2020-2022 written in Bahasa. In general these procedures describe:

- a. The certification unit has 2 types of worker status, namely Permanent (PKWTT) and Contract Workers (PKWT).
- b. The certification unit will carry out the completion process for prospective workers in accordance with the standard acceptance conditions and stipulated requirements.
- c. Recruitment of workers is based on needs and adjusted to the ability of the company.
- d. The certification unit does not accept or employ children (under 18 years old) in accordance with applicable laws and regulations. Recruitment of workers is based on the ability, expertise and assessment of prospective workers.
- e. The certification unit is authorized to carry out the placement, transfer and promotion of workers in accordance with applicable regulations.
- f. Termination of employment can occur when a worker retires, dies, resigns, and terminates an employment agreement due to a serious violation and others.
- g. The company respects human rights and provides equal opportunities for every employee to advance and be given the opportunity to work and associate without restrictions and discrimination or because of differences in ethnicity, religion, race and between groups (SARA).

At the time the audit was carried out, the Company Regulations for the period 2020 - 2022 have expired since March 13, 2022. Meanwhile, the management unit can show a statement letter on the draft of the Company Regulations for the period 2022 - 2024 accompanied by evidence that is still in the process of being ratified by the relevant agency. **(OFI)**

In addition to being publicly listed in Company Regulations, the certification unit has other policy and procedures in the form of Policies, SOP in accordance with the relevant regulations (Constitution No. 13/2003), Internal Memorandums related to recruitment, transfer, promotion, retirement, termination of employment and others. These procedures have been documented to all workers and their representatives. One of the socializations given to workers was related to Company Policies and Regulations in February 7-11, 2022 which was attended by all workers. For example, some procedures that are owned by the company include:

1. Standard Operational Procedure No. SOP-HC-006 concerning Employee Recruitment, Version 2.0, effective date 01 March 2021.
2. EHP's Sustainability Policy, approved by President Director with revision date on June 6, 2020.

Until this assessment, the certification unit still have contract worker (PKWT). The certification unit has 2 types of worker status, namely Permanent workers (PKWTT) and Contract Workers (PKWT). All the rights for each employment status have been distinguished. Based on interview with unit management, it is known that the process of hiring contract workers is still ongoing and is

planned to be completed in 2022. Information related to this is detailed in the indicators 6.2.7.

3.5.2

In general, the company has documented employment procedures such as promotions, performance assessment, pensions, and others. For example, the company can show the appointment of a harvester with the initials JRW who started working with contract status on June 26, 2021, then was appointed as a permanent employee after receiving a performance assessment with grade B results.

On the other hand, based on the results of field observations and interviews with maintenance workers in block F27B Arjuna Estate, there are still contract worker who feel they have never signed a work agreement contract. This has become a record of non-compliance with indicator 6.2.2.

Status: Comply

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

3.6.1

The company already has an OHS Policy as stated in the Company Regulation Chapter V Articles 29 and 30 and a Sustainability Policy issued by the President Director on 8 June 2020 which states that all workers must comply with all regulations related to OHS, to maintain a clean and sanitary working environment, to use and maintain work equipment and Personal Protective Equipment (PPE) provided and report any accidents that occur.

The company also shows the SOP with No. SOP-OTH-F3-006 concerning Investigation of Occupational Incidents, Accidents and Diseases, Version 2.0 effective January 10, 2019. All operating activities are risk assessed to identify OHS problems, which are briefly shown as follows :

- The latest “PT EHP Hazard Identification and OHS Risk Assessment – Mill” document in January 2022 which includes 26 activities at the EHP Mill such as activities in the sterilizer, boiler, press, etc.
- The latest “PT BLP Hazard Identification and OHS Risk Assessment” document in January 2022 which includes 32 activities at BLP Estates (ARJE, SMRE, BRME) such as harvesting, fertilizer, spraying, etc.

The OSH plan and work accident statistics have been documented in the Quarterly OHS Committee Work Program such as in the period January-March 2022 which includes an OHS plan consisting of 8 main programs, for example OHS socialization, capacity and skill improvement of workers, provision of Personal Protective Equipment (PPE), Analysis Risk Control of Hazard Identification, Audit and Inspection, Medical Services (first aid and medical examination), emergency, work accident and evaluation as well as work accident statistics consisting of LTA, FR and SR.

The company also periodically evaluates risk identification once a year or when a work accident results in fatality. Based on field visits and interviews with employee representatives, it can be concluded that employees have implemented preventive measures to minimize risks from work activities and employees can also convey the risks of the activities they do.

3.6.2

The company shows the realization of the OHS program listed in the OHS Committee report every quarter such as the first aid socialization which was held on 14 May 2022 at the Club House PT BLP with 38 participants and the company also shows the results of regular health checks for all employees and specifically for employees who have high potential risks such as chemical applicators and engine room operators.

From the results of special medical examinations, such as those conducted at PT EHP on January 25-28 2022, which was attended by 72 employees with audiometry, spirometry and CHE parameters, it was found that the employee's condition was normal and did not require further follow-up. In addition, the results have also been socialized by company doctors to employees.

The company also shows the identification of the need for PPE which was approved by PC Central Kalimantan 1 on February 2, 2022, which includes the need for PPE in each operational activity and the lifetime of the PPE. In addition, the company periodically also provides PPE to employees, for example as follows:

- Records of the provision of PPE on January 17, 2022, namely PPE for shoes, glasses, aprons and aprons given to 15 employees of spray workers.
- Records of the provision of PPE on January 17, 2022, namely PPE shoes, glasses, and helmets given to 13 harvest workers.
- Records of the provision of PPE on January 17, 2022, namely PPE shoes and helmets given to 10 process employees.
- Records of the provision of PPE on January 17, 2022, namely PPE ear plugs and ear muffs given to 5 engine room employees.

In line with the results of document verification, the spray workers at Arjuna Estate and the sterilizer Mill operator were also able to explain that the employees had received PPE free of charge by the company and understood the mechanism for replacing PPE if the PPE was damaged/lost. The PPE used by workers is currently in good condition and ready to use.

The auditor made field observations, for example in the Semeru Estate warehouse, it was known that the company had provided spare PPE, such as:

- 10 pieces of PPE helmets.
- 20 pairs of PPE shoes.

The company also appoints personnel in monitoring and evaluating OHS who position themselves as sustainability assistants as well as secretary of the OHS Committee who has attended general OHS expert training.

Status: Comply

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

3.7.1 & 3.7.2

The company showed the Training Program for each unit in 2021 that cover all aspects of the P&C RSPO. The training also covers parties who need training such as staff, workers, smallholders, and contractors. The training program document informs type of training, PIC, and plan / timetable. The 2022 training programs such as:

- Training OHS
- Training Early Warning System
- BMP's training
- First aid training
- Firefighter training

The company already has training records, such as:

1. Minutes of training harvesting and safety use was held at Arjuna Estate on April 19, 2022, Semeru Estate on April 16, 2022 and Bromo Estate on April 20, 2022 with total participants amount 174, 174, 218 participants.
2. Minutes of first aid training was held at Club House Arjuna Estate on May 14, 2022, attended by 38 participants.
3. Minutes of socialization of OHS was held at Arjuna Estate on January 12, 2022, Semeru Estate on January 17, 2022 and Bromo Estate on January 20, 2022 with total participants amount 234 participants.

The results of interviews with representatives of worker union, contractor and workers at mill and estate stated that the company had provided training or socialization regarding work procedures for each worker in bahasa and understood by the workers. Furthermore, the company has training program which involve contractors such as SOP socialization and training related to OHS. Besides that, based on field observation and verification document, the company has not been able to show sufficient evidence of licensed operators in accordance with the regulations (4 class II steam aircraft operators, 4 power and production aircraft operators and lift and transport aircraft operators for employees with initials BP). This has become a record of non-compliance with indicator 2.1.1.

3.7.3

The company show the socialization and inspection of SCCS implementation in the field on May 21, 2022, which was attended by 12 participants from estate and mill representatives. The purpose of this activity is to ensure the traceability of the FFB from the field to the mill. Based on the results of interviews with weighbridge and fruit clerk operators, it is known that the workers concerned have been able to properly explain their respective duties and responsibilities, such as the source of certified fruit is only from the land use title area while the source of uncertified fruit is from the cadastral block, NPP sanction block and FFB from third party supplier.

Status: Comply

3.8 Supply Chain Requirements for Mills

3.8.1 & 3.8.2

The supply chain model used by the company is Mass Balance because the sources of fruit processed by mill come from certified and uncertified areas including plasma and third party FFB supplier.

3.8.3

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

Product	Estimate Production period of 10 Aug 2020 – 09 Aug 2022	Actual Production (MT) of previous audit (Aug 2020 - May 2022)	Estimate Production of 12 month (MT) further
FFB	241,231	200,202.06	116,420
CSPO	43,974	43,100.34	25,613
CSPK	8,597	8,053.14	4,660

3.8.4

Bedaun mill has registered in RSPO IT platform for license period (10 August 2020 – 09 August 2022) with information i.e :

License ID : CB105247
 Member Name : PT. Eagle High Plantation Tbk
 Member ID : RSPO_PO1000004234
 RSPO Membership Number : 1-0048-08-000-00 (PT Eagle High Plantation Tbk)
 Issued On : 07/08/2020
 Issued By : PT Mutuagung Lestari
 Start Date : 10/08/2020
 End Date : 09/08/2020
 Total certified area (Ha) : 8,711.54

3.8.5

The organization has procedure SOP-OTH_F3-022: Supply Chain of Raw Material and Productions dated 10 January 2019. And also Work Instruction Number IKA/29/EHP-BLP/2019 about Certified product handling dated 27 February 2019.

- 3.1. Certified FFB's handling on Estate
- 3.2. Certified FFB's handling on Mill
- 3.3. CSPO & CSPK handling
 - 3.3.1 CSPO & CSPK Monitoring stocks
 - 3.3.2 CSPO Delivery
 - 3.3.3 CSPK Delivery
 - 3.3.4 Recording & Reporting
 - 3.3.5 CSPO & CSPK Non-conforming handling
 - 3.3.6 RSPO IT Platform/Palm Trace
 - 3.3.7 Traceability
 - 3.3.8 Market Communication & Claim
- 3.4 Farmer/Supplier Assistance and Empowerment Program
- 3.5 FFB Supplier Evaluation
4. RSPO SCCS Internal Audit
5. Management Review
6. Training and Refreshment
7. Changes in RSPO SCCS Work Instructions

In the procedure, the references used for example :

- RSPO Certification Systems 12 November 2020
- Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th April 2020.
- SCCS Certification Standard and System 1st February 2020

Based on observation and interview to the PIC in specific activities (i.e security/receiving FFB, weighbridge, and mass balance data PIC), they have been provide SCCS training and able to demonstrate awareness of the procedures related SCCS implementation.

3.8.6

Internal Audit of SCCS will be conducted annually, described in Work Instruction of Traceability of CPO, PK and PKO in MB Model (IKA/29/EHP-BLP/2019 dated 27 February 2019). The latest internal audit is conducted on March 2022 in line with RSPO P & C audit. There is 4 Nonconformity related SCCS implementation i.e

- Estimated tonnage of CPO and PK
- Registration and reporting for the appropriate supply chain through the RSPO IT platform
- Record keeping
- Registration of transaction

In the minutes of NCR compliance, it is stated that SCCS data that cannot be presented during the internal audit will be presented during the external audit.

3.8.7

The Mill has maintain the record of goods in such as in FFB Delivery Note and Mass Balance data, that identify amount and sources of FFB certified and uncertified received, as well as the certified products (CSPO and CSPK), shown as follows :

Product	Estimate Production period of 10 Aug 2020 – 09 Aug 2022	Actual Production (MT) of previous audit (Aug 2020 - May 2022)
FFB	241,231	200,202.06
CSPO	43,974	43,100.34
CSPK	8,597	8,053.14

Based on the table above, it is known that there has been no overproduction between the license quota and the actual production. At the time of the audit, Bedaun Mill proposed an increase in the volume of certified products, namely 8,300 MT of FFB; CSPO 2,000 MT; and CSPK 950 MT

In the SCCS Procedure (SOP-OTH-F3-022) it is mentioned that the handling of inappropriate products is as follows:

Inappropriate Product	Handling
Expired RSPO Certificate and SCCS RSPO was finish	- Inform to Strategic Department - Input the product volume (on sell and delivery) to Non CSPO/CSPK/CSPKO/CSPKE
The volume was over Mass Balance	- Inform to Strategic Department - Input the product volume (on sell and delivery) to Non CSPO/CSPK/CSPKO/CSPKE
Supporting Information is not complete	- Completing supporting document according to the rule - Continue the delivery/selling product as a CSPO/CSPK/CSPKO/CSPKE
Quality not according to the standard and/or volume difference	- Client inform to Head Office Commercial - Fulfill quality claim and/or volume difference based on contract or term of reference (TOR)

3.8.8

Based on document verification and interview with management representative obtained information in last 22 months before audit (Aug 2020 – May 2022) it was known if the certified product sold under RSPO and conventional as described in the table below :

Description	Dispatch period (MT) Aug 2020 – May 2022 Total
-------------	--

CSPO sold under RSPO Scheme	32,000
CSPO sold under other scheme	0
CSPO sold as conventional	9,671.18
CSPK sold under RSPO Scheme	0
CSPK sold under other scheme	0
CSPK sold as conventional	7,895.81

Product	Last Year Actual Certified Volume (MT)
	Aug 2020 – May 2022
FFB	200,202.06
CSPO	43,100.34
CSPK	8,053.14

Based on the data, there is no over sales of certified products or any non-certified products that are claimed to be certified products. Examples of sales documents shown include :

- Transaction ID : TR-664aabf1-2767
- Creation date : 22 April 2022
- Shipping/BL Date : 21/04/2022
- Ship name : BG Artha Jaya
- B/L number : 022//KMI/1V/2022
- Product name : CSPO
- Volume : 1,000 MT
- Seller : PT Eagle High Plantations Tbk
- Member ID : RSPO_PO100000234
- Buyer name : PT SMART Tbk – Surabaya refinery
- Member IS : RSPO_PO1000006037
- Seller contract number 700026100
- Buyer reference number : 004/PKS-EHP/MKT/IV/2022

3.8.9

EHP POM has imposed provisions that must be applied by contractors as contained in the Internal Memo (No. 010/BLP/IM-AM/Ist/III/2019 dated 13 March 2019) which has been socialized, these provisions include:

- The cooperation is bound by a work agreement
- PT EHP must ensure the socialization was carried out related regulation requirement such as labor, OHS, Environment, Legal, including field inspections and audits related to implementation of RSPO prerequisites can be carried out.

The contractors have been bound in a work agreement. Work agreement with contractors has a due diligence related of legality, policy and SCCS clause fulfillment such as implementation of sustainability policies in all operational aspects and stakeholders.

3.8.10

The list of contractors of CPO and PK transporter are :

No	Transporter	Products	Address
1	CV Berkah Era Surya Tama	CPO	Mulya Jadi Village, Pangkalan Banteng Sub-Regent, Kotawaringin Barat Regent.
2	CV Berkat Sekumpul	CPO	Kumai Hilir Village, Kumai, Kotawaringin Barat Regent
3	UD, Anita Group	PK	Sungai Bedaun Village, Kumai, Kotawaringin Barat Regent

3.8.11

When compared to the previous assessment there were no additional contractors handling certified products

3.8.12

Bedaun Mill has record of all Certified FFB, CSPO and CSPK as presented in the table below :

- **FFB**

FFB production (August 2020 – May 2022) : 200,202.06 MT

- **CSPO**

Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)			Total	Stok CPO	
	Cert	Non Cert		RSPO	Other scheme	Non Cert		Certified	Non Certified
Aug 20 – May 22	43,100.34	20,429.30	63,529.64	32,000.00	-	30,100.49	62,100.49	1,429.15	(9,671.18)

Based on this calculation, it is known that there are sales of CSPO as conventional amounting to 9,671.18 MT with the details of the calculation as follows:

- CSPO production – sales of CSPO as certified product : 43,100.34 – 32,000.00 = 11,100.34 Mt
- Production of Non Cert CPO – Sales of CPO as non cert : 20,429.30 – 30,100.49 = (9,671.18)
- Thus, by recording the stock in the storage tank is a total of 1,429.15 MT of CSPO obtained from the actual CSPO stock 11,100.34 minus the non-cert CPO stock (9,671.18).

- **CSPK**

Period	PK production (MT)		Total	Cert PK Dispatch (MT)			Total	Stok PK	
	Cert	Non Cert		RSPO	Other scheme	Non Cert		Certified	Non Cert
Aug 20 – May 22	8,053.14	3,600.61	11,653.76	7,895.81	-	3,416.62	11,312.43	157.33	183,99

* Based on production and sales data, it is known that both CSPK and Non Cert PK stocks are in a positive condition because the amount of production is > compared to the number of sales.

3.8.13-3.8.15

The conversion rate of production of CPO (OER) and PK (KER) were based on actual production. Then the management will monitor if the rate reasonable. Based on production data 23 months previous audit the certified products average OER is 21.91 %, while KER is 4.00 %.

3.8.16

Based on document verification and interview with management representative obtained information in last 22 months before audit (Aug 2020 – May 2022) it was known if the certified product sold under RSPO and conventional as described in the table below :

Description	Dispatch period (MT)	
	Aug 2020 – May 2022	Total
CSPO sold under RSPO Scheme	32,000	
CSPO sold under other scheme	0	
CSPO sold as conventional	9,671.18	
CSPK sold under RSPO Scheme	7,895.81	
CSPK sold under other scheme	0	
CSPK sold as conventional	0	

Examples of shipping documentation among them for Transaction ID: TR-664aabf1-2757 are as follows:

- Seller reference number : 7000026100
- Buyer Reference Number : 004/PKS-EHP/MKT/IV/2022

- Supply Chain Model : Mass Balance
- Volume : 1,000 MT
- Shipping /BL Date : 21/04/2022
- Creation date : 22/04/2022
- Product name : CSPO

3.8.17

Based on management representative interview and document review, the mill 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
There is a policy to respect human rights, which is contained in the Sustainability Policy document, which was approved by the President Director, revised on 11 June 2018. The policy, among other things, explains that EHP respects human rights as stipulated in the UDHR and ILO Core Conventions, if enacted in Indonesian law, including protecting human rights defenders and prohibiting retaliation against human rights defenders.

Based on interviews with stakeholders and employees, it was stated that they already knew about sustainability policies, especially regarding human rights. In addition, the policy has also been socialized, for example on January 20, 2022 at Bromo Estate Division 1, which was attended by 82 people.

4.1.2
The company has Sustainability Policy Revision dated 8 June 2020, Chapter 7 about Social & Economic Responsibilities that Eagle High Plantations (EHP) has a commitment to resolve the conflict and dispute peacefully and without violence. The valid channels of the settlement will be used as a means for peaceful and legal settlement agreed upon by both parties. The EHP opposes the use of weapons and the military in resolving conflicts and disputes.

Based on an interview with local contractors, worker unions, employee committee gender and previous land owners, sighted that there is no paramilitary uses for all company operational.

Status: Comply

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

4.2.1 & 4.2.4
The CH has an SOP for handling complaints and grievance from various parties, namely in the SOP no: SOP-OTH-F3-019, dated January 10, 2019. In the SOP describes the handling of complaints starting from the stage of receiving complaints from internal and external, verification and ranking of complaints, preparation of treatment plans, implementation of handling, monitoring of implementation, and documentation to completion through legal channels. Guarantee anonymity of the whistle-blower of the case has been maintained since from first stage. In the SOP it is stated that the settlement of complaints is made no later than 1 month after receipt. In the Action Closing and Documentation section it is explained that if the agreement of both parties is not reached by agreement, the related parties can report through the RSPO Complaints System.

The CH has socialized complaints/grievance handling procedures to employees and the surrounding community which was carried out on February 7-11, 2022 located at Club House Arjuna Estate, Semeru Estate's Office, Bromo Estate's Office and EHP POM's Office. The socialization was attended by 54 people, including internal and external stakeholders.

Based on interview with representative of local community, it is known that there is no complaint from community. They know how to communicate with company if they want to complaint something. The same thing also said by the workers in estate and mill. They

know how to submit complaint if any.

4.2.2

The company shows a communication procedure which explains that the company also facilitates the delivery of information to affected parties including those who illiterate by providing socialization during morning briefing.

4.2.3

Based on verification document of internal and external stakeholders, there is no complaint for 2021. The same information was also obtained based on interviews with local community who explained that there had been no complaints during the last year.

Status: Comply

**4.3
The unit of certification contributes to local sustainable development as agreed by local communities.**

4.3.1

The company already has procedures related to the fulfillment of social responsibility in SOP -OTH-F4-003 regarding Corporate Social Responsibility V.1 dated 18 September 2017 which includes guidelines for implementing CSR including program determination, budgets, and activity reporting. CSR programs for 2022 include education, environmental health, socio-religious, economic empowerment, and infrastructure. In addition, there are CSR priority programs based on the results of the MUSRENBANGDES which will be held on September 28, 2021, such as electricity entering the village, construction of a tourist village port, and stunting prevention.

The realization of the plans that have been prepared include the following:

- Giving tilapia seeds to Sungai Bedaun Village on April 11, 2022
- Stunting prevention activities carried out every month
- Heavy equipment assistance for opening access to tourist villages on January 16, 2022
- Assistance with community radio communication for fire care on January 11, 2022
- Bedaun Village Fogging on February 10, 2022

Based on the interviews with representatives of the Bedaun Village community and community leaders around the plantation, it is known that the benefits of CSR have been felt by the surrounding community. The form of community involvement in determining CSR is indicated by the company's willingness to attend MUSRENBANGDES. In addition to the programs that have been determined, the community is also welcomed to submit proposals if you want to hold events or other activities

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

Based on the area statement and certificates of land use title and building use title, it is known that the total area of the company is 8,941.12 Ha. The land use title is divided into 2 certificates, namely No. 13 of 2022 for an area of 7,641.00 Ha which was later corrected to 7,576.48 Ha and No. 40 of 2004 for an area of 1,300.12 Ha. Meanwhile, the area of building use title according to certificate No. 01 of 2022 is 64.52 Ha.

In this area there is an area controlled by the community/other parties covering an area of 41.58 hectares and an area included in the Right to Use Title covering an area of 188 hectares and excluded from the scope of certification. So that the scope of certification is 8,711.54 Ha.

Even though it is outside the scope, the company can show progress or information for the occupation area which is further explained in criterion 4.8. While for the HPK area the last progress shown is Letter No. S. 382/PKTL/KUH/PLA.2/4/2019 dated 5 April 2019 which states the application process for releasing forest areas. PT Bumilanggeng Perdanatrada (covering an area of ± 191 ha) is currently in the stage of reviewing and analyzing the completion of the release of forest areas as per Government Regulation no. 104 of 2015 concerning Procedures for Changes in Designation and Functions of Forest Areas.

The company also has a plantation business license for an area of ± 8,900 Ha and processing 60 Tons of FFB/Hour.

4.4.2

Until now there is no expansion of the company's area. Land acquisition was carried out from 1998 to 2015. Based on the results of the document review, it is known that the documentation for the land acquisition process includes the following :

- Payment receipts and payment documentation. Signed by the land owner.
- Statement Letter of Resigning Rights and Interests on Land and Planting Grows on Forest Area Land and Receipt of Payment of Compensation. Signed by both parties and recognized by the sub-district head and village head.
- Statement of Land Rights Release. Signed by the land owner.
- Certificate of waiver of rights. Signed by the Company, Land owner, sub district head and village head.
- Statement letter with attached sketch of land drawing. Signed by the land owner, the village head and the head of the Neighborhood.
- Payment proof documentation.

The results of interviews with representatives of the Sungai Bedaun Village community including community leaders and previous land owners, it is known that the land compensation process has been based on the agreement of both parties without any intimidation from any party. It was preceded by a process of socialization, negotiation, and compensation witnessed by the parties including village and sub-district representatives. Based on this, it can be concluded that the land acquisition process has basically applied the principle of FPIC.

4.4.3

The company already has maps related to legal rights, for example shown by:

1. Map of land compensation for the period 1998 – 2015
2. Compensation map for each percell which in each land compensation process one of the documentation that will be made is mapping of land location and determination of land boundaries
3. Operational map with a scale of 1: 80,000

The source of the map is PT EHP and PT BLP geodatabase created by the GIS team.

4.4.4; 4.4.5; 4.4.6

The company already has a Land Acquisition Procedure which was issued in 2019. The procedures, among others, have regulated the land acquisition process including FPIC with the parties. Based on the results of interviews with representatives of Bedaun Village, which are one of the previous land owners, it is known that the land release process has been based on the agreement of both parties, for example starting with socialization, land identification, negotiations, until the agreement on land release and compensation is known. by parties such as village government representatives, company representatives and land owners.

Status: Comply

4.5

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

4.5.1 - 4.5.8

Until now there is no expansion of the company's area. Land acquisition was carried out from 1998 to 2015. Based on the results of the document review, it is known that the documentation for the land acquisition process includes the following :

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- Statement of Land Rights Release. Signed by the land owner.
- Certificate of waiver of rights. Signed by the Company, Land owner, sub district head and village head
- Statement letter with attached sketch of land drawing. Signed by the land owner, the village head and the head of the Neighborhood
- Payment proof documentation

The results of interviews with representatives of the Sungai Bedaun Village community including community leaders and previous land owners, it is known that the land compensation process has been based on the agreement of both parties without any intimidation from any party. It was preceded by a process of socialization, negotiation, and compensation witnessed by the parties including village and sub-district representatives. Based on this, it can be concluded that the land acquisition process has basically applied the principle of FPIC.

Status: Comply

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

4.6.1, 4.6.2; 4.6.4

The company has a continuation policy as of June 11, 2018, which includes a commitment to resolve conflicts and disputes peacefully and non-violently. The legal settlement path will be used as a means of peaceful and legal settlement agreed upon by both parties. EHP opposes the use of weapons and the military in resolving conflicts and disputes.

In addition, there is also a Land Conflict Resolution SOP (SOP-EHP-SC-03) version 2 which states that if the party making the claim has clear legal documents, it will be followed up by the P & L department by involving the Area Manager & Head of Social Affairs. First option are discussion/deliberation to reach consensus involving traditional leaders, community leaders and local governments (participatory mapping process). If there is no agreement, then proceed to next stage (mediation by related agency) or take legal action.

Beside that, the company has procedure number SOP-OTH-F3-021 about Free, Prior, Inform, Consent (FPIC) with process: identification of customary lands, involving community institutions, information giving, ensure that consent is given voluntarily, ensure that approval is given before operational activities, ensure that there is agreement, resolve conflicts, negotiation, finalized written agreement, get support from government and notaries, implement agreement and participatory monitoring. The company has register all land compensated.

The results of interviews with representatives of the Sungai Bedaun Village community, including community leaders and previous land owners, it was found that the land compensation process was based on the agreement of both parties without any intimidation from any party. It was preceded by a process of socialization, negotiation, and compensation witnessed by the parties including village and sub-district representatives. Based on this, it can be concluded that the land acquisition process has basically applied the principle of FPIC

4.6.3

Based on the recap of the GRTT for the period 1998 – 2015 it is known that there are no things that show gender bias. Both men and women have the same rights in terms of their willingness to relinquish or not relinquish their land rights. Furthermore, based on the results of interviews with representatives of Bedaun Village including community leaders, it is known that both men and women have the same rights in the opportunity to acquire plasma (community plantation)

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 company has a continuation policy as of June 11, 2018, which includes a commitment to resolve conflicts and disputes peacefully and non-violently. The legal settlement path will be used as a means of peaceful and legal settlement agreed upon by both parties. EHP opposes the use of weapons and the military in resolving conflicts and disputes.

In addition, there is also a Land Conflict Resolution SOP (SOP-EHP-SC-03) version 2 which states that if the party making the claim has clear legal documents, it will be followed up by the P & L department by involving the Area Manager & Head of Social Affairs. First option are discussion/deliberation to reach consensus involving traditional leaders, community leaders and local governments (participatory mapping process). If there is no agreement, then proceed to next stage (mediation by related agency) or take legal

action.

Beside that, the company has procedure number SOP-OTH-F3-021 about Free, Prior, Inform, Consent (FPIC) with process: identification of customary lands, involving community institutions, information giving, ensure that consent is given voluntarily, ensure that approval is given before operational activities, ensure that there is agreement, resolve conflicts, negotiation, finalized written agreement, get support from government and notaries, implement agreement and participatory monitoring. The company has register all land compensated.

The results of interviews with representatives of the Sungai Bedaun Village community, including community leaders and previous land owners, it was found that the land compensation process was based on the agreement of both parties without any intimidation from any party. It was preceded by a process of socialization, negotiation, and compensation witnessed by the parties including village and sub-district representatives. Based on this, it can be concluded that the land acquisition process has basically applied the principle of FPIC.

4.7.3

Based on the results of the document review, it is known that the land compensation process was carried out from 1998 - 2015 to 165 land owners. Documentation related to the compensation process has been explained including in indicators 4.51 – 4.5.8. The benefits obtained from the community from the results of plantation development, for example, are the development of plasma plantations through the Bedaun Maju Bersama KUD and the Kumai Hulu Sebrang Cooperative.

Based on the results of interviews with representatives of the Bedaun Village community and the heads of the two cooperatives, it is known that the benefits of plasma have been felt by the community. The realization of plasma for the Bedaun Maju Bersama KUD has been 100% (covering an area of 1,864.31 Ha) and 384.41 Ha for the Kumai Hulu Sebrang cooperative from what should have been 805.64 Ha. The plasma development has not yet been completed because the Kumai Hulu community area is included in the right to use title.

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 - 4.8.4

Based on the results of document studies and interviews with the community and community leaders of Bedaun Village, it is known that at the time of ASA-2 and ASA-3 there were no ongoing land disputes.

At the time the assessment was carried out, based on the aresta the area identified as being under the control of another party was 41.58 Ha. However, based on the results of field visits, for example along the block bordering the H16/H17 and I17/18 Semeru Estate blocks, it is known that the area is already under the control of another party (1 year old oil palm plant). The same thing was found during a field visit to Block I/J 46 Bromo Estate in the form of rubber (In the map the area controlled by the community is a plain white area).

The company is currently in the process of re-identifying these areas. Which ones are owned by the company but controlled by the community, which ones have not been in the *GRTT* from the beginning. The temporary identification area is ±200 Ha for the three estates.

At the time of the assessment there was no open conflict between the company and the community regarding the area. National Land Agency of Kotawaringin Barat did not provide a willingness to be a resource person, while the Bedaun Community Leader and the Kumai Hulu Community Representative who were contacted stated that there were no land dispute. Meanwhile, Sekonyer Village could not be contacted due to signal problems, so more in-depth verification was needed at the time of further assessment of the relevant parties considering the company's commitment to identifying the areas controlled by other parties covering an area of ±200 Ha.

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1

The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.**5.1.1**

Based on document review, field observations and interviews with staff and management, it is known that the company obtains FFB supplies from third parties/FFB suppliers such as plasma, and FFB middleman suppliers. For cooperation with Plasma, the applicable FFB price refers to the decision of the Plantation Office per month and is routinely informed every month via email and communication media to the plasma/cooperative management. The company shows an example of a payment for the period of May 2022 which was paid directly to the cooperative's account at the current price. The company can also show the Minutes of Meeting Results of the FFB Purchasing Pricing Team for that period.

For cooperation with middlemen, the price of FFB is determined in a work agreement agreed by both parties, several considerations in determining the price of FFB such as the price of CPO, PK, transportation costs, and proposed prices from suppliers. Before making a payment, the verification of the correctness of the payment calculation has been checked by both parties in the FFB sale and purchase calculation document, so that all complaints and confirmations related to payments have been completed before the payment is made. The pricing mechanism has been explained in the FFB sale and purchase agreement signed by both parties. Interviews with the management unit and FFB suppliers also stated that the FFB price that had been determined could be accessed by the supplier, and was informed every day via email, online communication media and telephone from the PIC to the supplier.

5.1.2

As explained in indicator 5.1.1, the plasma FFB price refers to the price determined by the Plantation Service, while the FFB price for middlemen uses the calculated price for CPO and PK which is updated daily. The company also has a mechanism for conveying prices which is done using email and communication media. Based on the results of interviews with plasma farmers, stated that the price set by the company was in accordance with the price set by the local Plantation Service, where if there was an update on the price, the company immediately conveyed it through communication media and posted it on the notice board at the Cooperative's office.

The company can also show proof of plasma management transparency by showing details of production and costs for the period of May 2022 where in the document there is a table that explains FFB production data and details of management costs from discounted fees, maintenance costs, fertilization costs and others. This is conveyed to the plasma managing cooperative and has received approval from the cooperative management with proof of stamp before making payment. The results of interviews with the plasma management of the Kumai Hulu Seberang Cooperative also stated that the price distribution was quite clear and there were no complaints regarding payments, the value paid was divided into 50% for plasma, and 45% for debt repayment, maintenance and management of the cooperative and 5% for savings plans. replanting with a monthly payment system. This is in accordance with the agreement letter agreed by both parties.

5.1.3

The company has determined the fair price that has been agreed with the plasma management cooperative as outlined in the Cooperation Agreement, in the document there is a statement that the price set for the determination of the selling price of FFB is the price set by the Plantation Service, so the parties hereby declare that they will comply with the price fixing so that one party and the other are not entitled to ask for a price increase or decrease. Meanwhile, the determination of prices with outside FFB suppliers refers to the calculation results of fluctuations in CPO and PK prices. There are also specifications and implementation requirements as well as sanctions that must be met by all parties, for example those contained in the Cooperation Agreement with FFB suppliers on behalf of CV Hosana Perkasa, which are as follows:

- The first party has the right to refuse FFB if the quality does not meet the criteria for ripe fruit set.
- If there is a difference in weighing between the seller and the buyer's books, the settlement will be carried out on the day of delivery/delivery to avoid discrepancies in the weighing results when payment is made.
- FFB sold does not come from partnership plasma plantations built by companies/groups of companies, and is not stolen and/or from criminal activities.

Based on document review and interviews with suppliers of FFB and Plasma Cooperatives, it can be concluded that the company has determined a fair price which explains all components including the determination of premium value, savings, treatment cost discounts and others, all of which have been agreed upon by all related parties and are documented in the form of a letter. cooperation agreement and proof of payment.

5.1.4

The company can show evidence that representatives from FFB suppliers and cooperatives as plasma administrators are involved in drafting the contract. The document contains agreements such as maintenance financing, loans/credits, repayments through FFB deductions for the replanting program and/or other support mechanisms that have been signed by all representatives of the cooperative, witnesses and the company. This shows that all relevant parties have been involved in the decision-making process and understand the contents of the contract. Following are the MoUs with plasma, among others:

- Cooperation Agreement for Development and Management of Oil Palm Cultivation between the Cooperative Leaf Plantation Maju Bersama and PT BLP Number 61/KOP-BMB/XI/2015 dated 7 November 2015. Plasma participants: 1,434 people and an area of 1,850.68 Ha has been built.
- Cooperation Agreement for the Development and Management of Oil Palm Cultivation between the Kumai Hulu Seberang Cooperative and PT BLP Number 001/SPK-LGL/BLP/II/2017 dated January 30, 2017. Plasma participants: 399 people and an area of 384.41 Ha has been built out of a total of 805.41 Ha.

The development of plasma plantations is also carried out to improve the welfare of the community around the plantations where currently management related to plantations is still carried out entirely by the company's management by assigning Managers and Assistants to help manage plasma within their management area. Cooperatives play a role in managing the finances obtained from the sale of FFB and distributing them to all members. Cooperative members consist of the community around the company who want to be involved, not limited to men or women. Regarding the involvement of women in decision-making, it can also be proven from the results of interviews with the head of the cooperative which stated that plasma land was given to all communities living in the designated village, not limited to men or women. The informant stated that the contract was made with the agreement of both parties without any coercion, intimidation and discrimination.

5.1.5

As explained in indicators 5.1.1 - 5.1.4 related to Cooperation Agreements with Cooperatives and independent smallholders, the results of the verification of the Cooperation Agreement Letter document indicate that all existing contracts have been made fairly, in accordance with applicable laws, are transparent and have a predetermined time period. agreed together. The results of the interview with the Cooperative Management stated that all members have understood the stipulated provisions such as the determination of FFB prices, management fees, management fees, loans, disputes, and others. The agreement has also been made in accordance with applicable laws in a fair, transparent, and has a clear time frame.

In addition, the company can also show a Statement of Cooperation for the purchase of FFB from the middleman supplier FFB, for example, a statement letter on behalf of CV Hosana Perkasa made on December 31, 2021 with Number 008/EHP-CV HOSP/TBS/XII/2021 and valid for 1 year. In the statement made, it was stated that several conditions for FFB were mentioned, including FFB source location, FFB criteria, FFB repatriation, fines and delivery of FFB to the mill. Based on this explanation, it is known that the management unit already has a contract that is made fairly, in accordance with applicable law, and is transparent, and has an agreed term.

5.1.6

The Cooperation Agreement Letter explains the procedure / system for paying for the net sales of FFB, both for independent FFB suppliers, collectors and plasma. Payment is made based on the Minutes of FFB sale and purchase which has been agreed and signed by all parties. Based on the results of the study of the proof of FFB payment documents to the Kumai Hulu Seberang Cooperative as well as the minutes of the presentation of the results and an explanation of the operational costs for the period of May 2022, it shows that the payment has been made on time and can be proven through a receipt for payment. The plasma fruit payment is valid for the period 1-31 May 2022. The payment has been completed with income from each farmer group, fruit tonnage, and price according to the period. Based on the results of the verification of the Plasma FFB price and proof of calculations from the payment recapitulation data, it is known that the payment has been in accordance with the price set by the Plantation Service. The proof of payment document also explains the details of production and monthly period costs, FFB production data and details of management costs, maintenance costs and fertilization costs. The document is also submitted to the cooperative through a meeting attended by representatives of the cooperative and has been approved with proof of stamp.

As for examples for fruit payments for external FFB suppliers, for example, proof of FFB payment to CV Hosana Perkasa dated 8 June 2022 for the FFB delivery period on 1-5 June 2022. The invoice is explained in the form of the amount of FFB received, the price applicable on the date of delivery, and total payment after withholding tax PPH22. Each payment data has been equipped with

weighing data, grading reduction data and proof of transfer. Based on this explanation, it is known that the management unit has made fruit payments to plasma and the middleman supplier FFB in accordance with the contract they have, either the payment period or the specified price.

5.1.7

The company has tested the electronic weigh bridge for PT EHP by the Head of UPT Metrology legal, Kotawaringin Barat Regency Government with evidence, among others:

- Test Result Certificate for Bedaun Mill which was carried out on March 10, 2022 and valid until March 10, 2023, number 510.3/249/DPPKUKM.3/SKHP/III/2022 with serial number 161756027 and maximum capacity 40,000 Kg.
- Test Result Certificate for Rahayu Mill which was carried out on March 11, 2022 and valid until March 11, 2023, number 510.3/250/DPPKUKM.3/SKHP/III/2022 with serial number 104350299 and maximum capacity 40,000 Kg.

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

5.1.8

The company has conducted socialization related to RSPO certification to independent smallholders and plasma farmers through regular meetings. The company showed the Minutes of the annual meeting on March 10, 2022 which was submitted to FFB suppliers attended by 7 participants about the benefits of the RSPO, and the recommendation to register for the RSPO. From the results of the meeting, it was stated that independent smallholders would follow the company's initiation to include their land in RSPO certification and would follow all existing requirements and regulations. In this outreach activity, the certification unit also promoted the RSPO. Based on the results of the socialization conducted to FFB suppliers, it was concluded that the certification activities had not been realized. This is due to difficulties in establishing cooperatives and farmer groups to coordinate certification activities.

The results of interviews with the company stated that they are currently assisting in the socialization phase to all suppliers who cooperate with the company. Informants stated that they are very interested in participating in RSPO certification because the benefits are quite large, in addition to the increase in FFB prices, market demand will also be higher due to the status of the certified fruit.

5.1.9

The company also has a procedure related to communication, consultation and coordination contained in the SOP document for Handling Complaints and Dissatisfaction number SOP-OTH-F3-019 which is valid on January 10, 2019. The procedure explains technically the guidelines for receiving various complaints submitted by stakeholders or other parties and the process of resolving them. Companies through their respective departments have recorded requests for information and responses. The deadline for responses to requests for information or conflicts is 1 week after the letter is received (from the Unit Head to the relevant Department). Responses are made no later than 3 weeks after the letter is received. In addition, there is a clause that guarantees the confidentiality of the whistleblower and the reporting witness. Based on the results of the document review, it is known that for the 2021 period there were only requests for information and assistance, and there were no complaints from farmers or the surrounding community. The company has also appointed officers who act as communicators between the company and the community so that people who cannot read/write can be informed by the relevant communicators.

In addition, to accommodate complaints, a suggestion box is also provided as a means of submitting complaints that can be submitted anonymously. The complaint flow is that the employee writes down the problem in the complaint book available at the estate office, then at least 2 weeks the unit leader must seek a resolution first. If it cannot be resolved, it will be forwarded in writing to the head of the representative. Each stage of completion is documented and kept by the head of the representative. Based on the results of interviews with Cooperatives and FFB suppliers regarding the complaint handling mechanism, they stated that complaints can be submitted through letters or direct submissions through communication media and/or in regular meetings. The informant also stated that for the 2021 period there were no complaints, the entire cooperation process that had been going on so far was going well.

Status: Comply

5.2
The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.

5.2.1

The certification unit has conducted consultations with FFB supplying smallholders as shown by evidence of socialization related to RSPO certification to independent smallholders and plasma smallholders through annual meetings between the company and FFB suppliers. The company showed the Minutes of the annual meeting on March 10, 2022 which was submitted to FFB suppliers attended by 7 participants about the benefits of the RSPO, and the recommendation to register for the RSPO. In addition, there is also evidence of consultation activities with representatives of plasma farmers regarding technical aspects of field work through socialization of BMP, handling of pesticides and sprays on March 13, 2022 to 30 participants and March 29, 2022 to 18 participants. From the results of the meeting, it was stated that independent smallholders would follow the company's initiation to include their land in RSPO certification and would follow all existing requirements and regulations.

In this socialization activity, the certification unit also promoted the RSPO. Based on the results of the socialization conducted to FFB suppliers, it was concluded that the certification activities had not been realized. This is due to difficulties in establishing cooperatives and farmer groups to coordinate certification activities. The results of interviews with the company stated that they are currently in the stage of socialization to all independent farmers. The results of interviews with FFB suppliers stated that they were very interested in participating in RSPO certification because of the many benefits, but they still did not know about the certification system and its fulfillment because the socialization provided was not deep and comprehensive enough.

5.2.2

The company has made improvements to the welfare of the communities around the plantations by developing and fully managing plasma plantations and regularly conducting socialization related to RSPO certification. Currently, the management of Plasma is fully managed by the cooperative management, while the company only provides assistance to ensure that the management of oil palm cultivation is in accordance with RSPO standards. In addition, companies can also show socialization documents about best practices in oil palm cultivation, work safety, environment, fire, benefits of RSPO, and recommendations to register for RSPO which will be carried out on March 10, 2022 which were submitted to FFB suppliers attended by 7 participants. In addition, there is also evidence of consultation activities with representatives of plasma farmers regarding technical aspects of field work through socialization of BMP, handling of pesticides and sprays on March 13, 2022 to 30 participants and March 29, 2022 to 18 participants.

However, based on the explanation in indicator 5.2.1 which states that there are no independent smallholders who can participate in RSPO certification due to several obstacles, so far, the company has only implemented programs to improve the standard of living for farmers, only providing socialization. The results of the interview with the middleman supplier of FFB on behalf of CV Hosana Perkasa stated that the farmers who supply FFB to them already knew about the RSPO from the results of the socialization by the company, but the obstacle experienced was the difficulty in establishing cooperatives and farmer groups to coordinate certification activities.

5.2.3

Based on the explanation in indicator 5.2.1 which states that there are no independent smallholders who can participate in RSPO certification due to several obstacles, so far, the company has only implemented programs to improve the standard of living for farmers, limited to providing socialization. Regarding support for farmers to encourage the legality of FFB production, only for Plasma farmers, all farmers already have legal documents where all document control is carried out in full by PT EHP and PT BLP. As for independent smallholders, support is only done indirectly in the form of data collection on the legality status of land owned by all FFB suppliers in compliance with indicator 2.3.2 where companies are required to obtain FFB from legal sources.

5.2.4

When the audit was conducted, the collaboration between the certification unit and plasma was carried out with a full managed management system where the management of plasma plantations was fully managed by the Company. Because the management is carried out by the Company, all employees working on plasma plantations are workers who have been trained by the company in handling pesticides, treatments, fertilization and others. The company also continues to provide assistance in plantation management in accordance with RSPO standards. The training activities can be proven based on the minutes of pesticide training to the Agrochemical Application Officer and Cooperative management on January 28, 2022, which was attended by 26 participants.

5.2.5

The unit of certification can show evidence that it has publicly reported the support program for smallholders, especially plasma farmers regarding its development which is carried out regularly. The evidence shown is based on the receipt of the 2021 LKUP Semester 2 submission document to the Kotawaringin Barat Regency Agriculture Service on March 4, 2022 as well as the 2021 CSR Report which is publicly accessible.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1 Any form of discrimination is prohibited.

6.1.1 & 6.1.3

The certification unit has a commitment to respecting nondiscrimination that has been describe in company regulations for the period 2020-2022 state that the company respects human rights and provides equal opportunities for every employee to advance and be given the opportunity to work and associate without restrictions and discrimination or because of differences in ethnicity, religion, race and between groups (SARA). That policy which explained that certification unit did not discriminate against gender, race or ethnicity, disability, sexual orientation, age, or belief. Based on the employee registration document, unit certification has provided equal opportunities and treatment in employment opportunities. This is evidenced by the diversity of ethnic accepted to work. The results of the employment document review prove that certification unit does not discriminate and treat all workers equally, the following is evidence that can be shown by the certification unit:

- The composition of workers consisting of various ethnic groups, religions, gender and workers' origins.
- Recruitment of workers based on the results of selection, performance appraisal, ability and expertise of workers. For example, harvester with initial GHE, who have employee number 71232904862302220152 received based on the results of the selection of job application files, results of health checks and results of interviews. The worker also passed the test and has been accepted as permanent worker in June 04, 2022.
- Worker placement and training are carried out in accordance with their expertise / type of work, such as prospective harvest workers are placed as harvest workers and receive regular harvest training.
- Women workers are given equal rights, wages and opportunities to get promotions with male workers of the same type of work, for example there are several maintenance foremen who are female workers.

These explanations can conclude that the company has treated all workers equally (based on skill, quality and eligibility) without discrimination based on gender, ethnicity, religion, health conditions or others.

6.1.2

There are no conflicts related to discrimination and employee diversity parameters. In addition, there are no migrant workers at PT Eagle High Plantations. To ensure the implementation, the auditor conducted a review of the worker list document, and it was found that the recruited workers had various educational, ethnic and religious backgrounds. In addition, based on field observations, it is known that workers come from various ethnic groups, religions, races, and genders.

Based on interview's result with mill and estate workers, worker union and gender committee revealed that the recruitment of workers was based on company needs regardless of ethnicity, religion, and specific background. All prospective employees have the right to get the opportunity to work in accordance with their scientific background and company needs. During 2021 there were no issues regarding discrimination against workers. In addition, the results of interviews with village communities around the company also revealed that so far there have been no acts of discrimination within the company or its surroundings. The company also always provides equal opportunities to the surrounding community to work in the company in accordance with the provisions and needs set.

6.1.4

Based on interview with women workers in estate and mill as well as gender committees revealed that pregnancy tests were only conducted for pesticide applicators to avoid the employees being exposed to pesticides. If declared pregnant, the worker will be transferred to a safer job but still equal in terms of wages and other benefits, so that there is no discriminatory action. Further explained that so far there had never been a pregnancy test which was a discriminatory measure.

6.1.5

Gender committees have been formed and are still active until today in the certification unit which is chaired by the committee chairperson along with coordinators in several sections and there are representatives in each unit. The main objective of forming a gender committee is to provide a forum that can accommodate the aspirations / complaints of workers (especially women), as company partners in carrying out the 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 the 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 workers also knew of the existence of the gender committee because it had been routinely socialized by its management, the last socialization related to the gender committee and the activity was carried out on May 23, 2022 which was attended by 37 workers, including male and female workers.

The results of interviews with women workers and representatives of the gender committee revealed that until now there were no reports / issues / complaints related to gender reported by the workers and at the moment the activities carried out were gender meetings during children healthcare (*posyandu*), women recitation weekly and others.

6.1.6

The wages applied in the PT Eagle High Plantations is in accordance with the Decree of the Governor of Central Kalimantan No. 188.44/445/2021 on November 30, 2021. The Minimum Wage for Kotawaringin Barat Regency in 2022 is Rp. 3,077,218.

The structure of the wage scale has been determined in the PT BLP's Decree - Wage Structure 2022 document which was approved by the Head - Human Capital & CS on January 3, 2022 which explains that the highest wage is currently in class A of IDR 4,867,218,- and the lowest wage is in G of Rp 3,077,218,-

The results of verification of wages of workers (for example warehouse keeper and daycare officer), it was known that the company has given the same wage for the same scope of work. The results of interviews with workers such as warehouse keeper and daycare officer, harvester and others stated that the company has given the same salary for the same scope of work.

Status: Comply

6.2

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

6.2.1

The certification unit has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Company Regulation period of 2020-2022. The document has explained to workers in a language they understand (in Bahasa), such as regarding working hours (article 7), the wage system (article 9), overtime work (article 11), work accident compensation (article 16), death benefit (article 17), BPJS Employment program (article 19), annual leave (article 27), maternity leave/miscarriage, menstrual leave & permission to breastfeed children (article 29), enforcement of work discipline and procedures for imposing disciplinary sanctions (article 36) and others.

The company has regulations regarding remuneration system in accordance with the provisions of the law and company regulations. The following are regulations set by the government along with separate stipulations from companies regarding the 2022 minimum wage, namely:

- Decree of the Governor of Central Kalimantan Number 188.44/445/2021 concerning District/City Minimum Wages in 2022. In the document, it is explained that The Minimum Wage for Kotawaringin Barat Regency in 2022 is Rp. 3,077,218.-
- Company Wage Decree Number 035/606/HC-UM/BLP/I/2022 concerning Wages for Contract Worker Wages in Kotawaringin Barat Regency, Central Kalimantan Region in 2022, issued on 3 January 2022. The document explains that the wages of PT Bumilanggeng Perdanatrada workers in 2022 of Rp. 3,077,218.- per month or Rp 123,088.72 per day and valid from January 1, 2022.
- Company Wage Decree Number 051/622/HC-UM/BLP/I/2022 concerning Permanent Worker Wages for Kotawaringin Barat Regency, Central Kalimantan in 2022 issued on January 3, 2022. The document explains that the wages of PT Bumilanggeng Perdanatrada workers in 2022 are Rp. 3,077,218.- per month and valid from January 1, 2022.

Based on the salary slip for the period of May 2022, it is known that the wages received by workers are as follows:

- The POM administration with the initials YKS gets a net wage of IDR 5,129,882.49 with details, the number of working days is 21 WD, the basic wage is IDR 2,584,863.12, overtime pay is IDR 2,668,108.09, BPJS allowance is IDR 335,109.04 with a deduction on BPJS of IDR 458,197.76
- Harvester with the initials JRW gets a net wage of IDR 6,341,626.68 with details, the number of working days is 21.66 WD, the

basic wage is IDR 3,029,660.99, harvesting premium pay is IDR 3,435,054.40, *BPJS* allowance is IDR 324,338.78 with a deduction on *BPJS* of IDR 447,427.50

Based on the verification of the list of workers, it is known that there are 2 types of workers, namely permanent workers and contract workers (daily workers). Based on the verification of the workers' salary slips, the company has provided wages that have referred to the wage determination set by the company. Furthermore, based on interviews with workers, it is known that workers receive salary slips every month and know detailed wage information such as wages received and wage deductions.

Based on the above explanation it can be concluded that the workers have received wages in accordance with the provisions of the law.

6.2.2

There are work agreements, including those listed in the PT EHP Company Regulation 2020 – 2022. The document has explained to workers in a language they understand, such as regarding working hours (article 7), the wage system (article 9), overtime work (article 11), work accident compensation (article 16), death benefit (article 17), *BPJS* Employment program (article 19), annual leave (article 27), maternity leave/miscarriage, menstrual leave & permission to breastfeed children (article 29), enforcement of work discipline and procedures for imposing disciplinary sanctions (article 36) and others. The company regulations have been approved by the Indonesian Ministry of Manpower on June 9, 2020.

The results of interviews with the worker (including worker with initial YNT) concerned in block F27B ARJE obtained information that they have never signed a work agreement with the company. Based on the list of workers in May 2022, it is known that workers with the initials YNT are registered as loose-fruit picker with daily worker status and have been working since 26 June 2021. As follow up regarding this issue, unit management shows the work agreement contract. Based on verification document from the Work Agreement for Contract Worker, it is shown that the validity period of the agreement is from 26 June 2021 to 26 September 2021. In the SPK it is written that the basic wage/day is Rp. 123,088.72, which should be for the period of 2022. Thus it can be concluded the company has not been able to show sufficient evidence that all employees have a valid employment bond. **Non-conformity No. 2020.02**

6.2.3

Based on the list of employee wages, it is known that there is a proportion of HK, for example for ARJE spray employees, for example:

- Initials SPR (Loose fruit picker) → based on the finger print recapitulation document the person concerned works as much as 21 Working Days while in the wage slip document it is 17.32 Working Days.
- Initials JWR (Harvest) → based on the finger print recapitulation document the person in question works as much as 22 Working Days while in the wage slip document it is 21.66 Working Days.

The management explained that the proportion of Working Days was due to the workers not getting the basis set by the company (Management's explanation was that the proportion of Working Days was because the worker concerned did not get the basis when picking loose fruit (while picking loose fruit was done using the rotation area system and completing the area).

In the company regulations for the 2020 - 2022 period, article 7 concerning the article on working time states that the determination of working hours for plantation locations is based on the company's needs, namely 7 (seven) hours a day and 40 (forty) hours a week. Based on government regulation No. 36 of 2021 → Deductions from wages by employers can be made for payment of fines and compensation and are carried out in accordance with the Employment Agreement, Company Regulations or Collective Labor Agreement. Until the assessment is complete, supporting evidence has not been shown that the low output of the worker is indeed due to the worker who does not want to complete his work responsibilities.

The company has not been able to show sufficient evidence of legal compliance, especially the remuneration system related to deductions in accordance with applicable regulations. **Non-conformity No. 2020.03**

6.2.4

The company has provide a facilities to their employees which related of housing, healthcare, education, sport and religion activities. Based on interview with workers (from EHP Mill, ARJE, SMRE and BRME), as well as with housing accoupants, it was known that electricity and water were free. Water quality from artesis wells was considered good. Company also provide reverse osmosis water for consumption for housing area. Other facilities such as house, water sanitation, clinic, mosque, cooperative, school, bus, etc. were

given for free. Furthermore, they also said that currently the company has an ongoing program related to improving toilet sanitation.

The results of field observations in housing areas and interviews with workers and worker union known that the company has provided housing facilities and infrastructure and facilities that are in good condition to workers such as houses, clean water facilities, religious facilities, sports, school buses, ambulances, clinic and others. The condition of the house is permanent and has good sanitation. From the observations, also known that in each housing location there are childcare areas, trash bins, and others.

6.2.5

Adequate food supply can be accessed through worker cooperative that provide basic food. In addition, there are stalls/shops around employee housing as well as outside traders who visit quite often to provide basic needs to employees in the estate.

6.2.6

In Indonesia no living wage standard is established, so certification unit still implemented the national minimum wages for all workers. In addition to the payment of minimum wages, certification unit has been conducting an assessment of the prevailing wages and in-kind benefits provided to workers in the certification unit aligned with the RSPO Guidance for Implementing a Decent Living Wage. The certification unit has the determination of assessment prevailing wage and all kind of benefits for DLW simulation in 2022 has been included in the calculation of main wage, worker status, housing facility, education, electricity, water sources, healthcare and others. The results of these calculations are known that the standard of DLW currently given / simulated by the certification unit is above the stipulation of the minimum wage with scale of minimum 89.62%.

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

The results of these calculations are known that the standard of DLW currently given / simulated by the certification unit is above the stipulation of the minimum wage with scale of minimum 89.62%. → what the meaning of this sentence (are below the minimum wages)

6.2.7

Based on verification worker list document for the period May 2022, it was known:

- There are 569 workers in Arjuna Estate, including: 60 permanent harvester and 42 contract harvester.
- There are 448 workers in Bromo Estate, including: 58 permanent harvester and 51 contract harvester.
- There are 448 workers in Semeru Estate, including: 92 permanent harvester and 22 contract harvester.

Based on the results of interviews with the management unit, it is known that the COVID-19 pandemic situation is one of the factors causing the company to postpone employee appointments. The company can show the process of employee appointments during the 2022 period, for example there are 32 harvest contract harvester who have changed status to permanent harvester.

6.2.2	Status: Non-conformity No. 2022.02	
6.2.3	Status : Non-conformity No.2022.03	

6.3
The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.

6.3.1

The CH has policies listed in Article 36 of the Company Regulations relating to the Right to Organize and Complaints that contain the following contents:

1. The CH supports the implementation of regulations and laws concerning human rights, including the right to association guaranteed by law
2. Complaints/dissatisfaction from the employee regarding the employment relationship working conditions and labour conditions will be resolved by consultation with his direct supervisor. If it cannot be resolved, then it will be forwarded to the higher leadership
3. If it cannot be resolved internally, then assistance is sought from the local manpower agency for further resolution.

The information on freedom of association listed in the policy was carried out regularly and the last socialization was held on January

12, 2022 at Arjuna Estate.

6.3.2

Has been shown the minutes of regular meetings between the company and worker union. The latest meeting on May 17, 2022 discussing health and employment worker.

6.3.3

Based on interview with representative of worker union of PT Eagle High Plantations, it is true that company is giving freedom for worker to establish a worker union. Also, the company did not give any intervention related to worker union activity. Interview with workers, it is known that some workers are registered in worker union and there are also those who are not. Workers also stated that participation in trade unions was voluntary.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1 & 6.4.2

There is a formal policy on child protection, which is stated in the Sustainability Policy, revision dated June 8, 2020. In point 7.8 it is stated that forced or child labor is not to be employed at any EHP location. In addition, it is also stated in the PT EHP Company Regulation for the period 2020 – 2022, in article 5, that in the employee recruitment process, the requirements and documents that are absolutely required are at least 18 years of age.

This policy is also included in service contract documents and agreement documents with suppliers, which are stated in the Carriage of Agreement, number 001/TRANS/EHP-SPK-BEST/CPO/VIII/2021 between PT EHP and CV Berkah Era Surya Tama article 21, which include explain that ensuring the actions of the second party (contractor) are in accordance with the requirements such as the prohibition of the use of child labor, the prohibition of forced labor practices and others.

The implementation of this policy is known, among others, based on the results of a review of Employee Data documents, for example Employee Data for the June 2021 period at PT EHP, it is known that there are no workers who work under the age of 18.

6.4.3

Based on verification document, field observation, and interview with the workers including Labor Union and Gender Committee, there are no young workers / under 18 years old, including there are no internship student in PT Eagle High Plantation.

6.4.4

Based on interview with the workers in the mill, estates, and third party, as well as Labor Union and Gender Committee, they already received socialization related prohibition of child labor. In the office area also has been installed the signboard of no child labor policy.

Status: Comply

6.5

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

6.5.1 & 6.5.2

The CH has a policy related to sexual harassment and reproductive rights listed in the Company Regulations and Sustainability Policy, revision dated June 8, 2020. The document explained that EHP will not accept any form of harassment, including sexual harassment as well as violence towards its employees, defined as a course of comments or actions that are unwelcome (or should reasonably be known to be unwelcome) to the person towards whom they are addressed. In addition to aspects of gender and reproduction, the gender committee also includes social, religious, health and child protection. The CH has conducted socialization related to this policy in each unit.

Based on document verification and interviews with estate and mill employees revealed that CH had socialized the prohibition of sexual harassment against women; and protection of reproduction rights on February 7-11, 2021, including internal and external stakeholder.

6.5.3

The Gender Committee and the management of PT EHP and PT BLP has held a meeting on May 25, 2022 there were a number of

inputs and suggestions including:

- Young mothers (having children age < 24 months) are given space to breastfeed their children, such as child care.
- Young mothers are given jobs that don't use chemicals.
- Young mothers are given a work area not far from housing complex or child care, so that every four hours they can breastfeed their children.
- The management can provide policy for young mothers to take a break after breastfeeding can resume their work.
- Young mothers are given health facilities for health check and child development for up to 24 months.

6.5.4

The CH has complaint handling procedure for all parties and society number SOP-OTH-F3-019 dated 10 January 2019. The procedure states that the CH guarantees the security and confidentiality of reporter (whistleblower) and also attached a flow chart of the mechanism for handling complaints by all parties (stakeholders). Head of Section or Assistant accommodates & studies complaints/aspirations and reported to the unit manager. Complaints will be responded by the CH a maximum of 14 days from the date the complaint was received by the operational unit.

Based on field observations and interviews with female worker and gender committees revealed that up to now there have never been cases of sexual harassment or violations of reproductive rights.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1 & 6.6.2

Based on document verification sighted that there are no migrant workers on this certification unit, there are only permanent workers and daily 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 person in charge of Occupational Safety and Health is identified as stated in the Decree of the Head of the Manpower and Transmigration Office of Central Kalimantan Province Number KEP.49/DISNAKERTRANS/III/2020 concerning the Ratification of PT BLP OHS Committee, dated March 17, 2020, with the secretary of KR (initials) who already has Decree of the Minister of Manpower of the Republic of Indonesia number 5/6985/AS.02.04/VIII/2020 concerning the Appointment of General OHS Experts issued on 19 August 2020.

There are recordings of regular meetings between the person in charge and the workers, such as in the minutes of the meeting on May 9, 2022 in the ARJE meeting room which was attended by representatives of workers and representatives of management, which among others discussed the maintenance/storage of harvest work tools in employee housing, the number of accidents work and the following month's OHS program.

6.7.2

Procedures for emergency response and work accidents in Indonesian can be seen at :

- SOP-OTH-F3-006 concerning Investigation of Incidents, Accidents and Occupational Diseases Version 2.0 is effective from January 10, 2019.
- SOP-OTH-F3-01 on Prevention, Management and Recovery of Emergencies Version 2.0 is effective from January 10, 2019.
- SOP-OTH-F3-011 on Land and Building Fire Control Version 2.0 is effective from January 10, 2019.

Work accident statistics have been documented in the Quarterly OHS Committee Work Program such as in the January-March 2022 period which has been reported to the Manpower and Transmigration Office which includes LTA, FR and SR. Based on field visits to warehouses and hazardous and toxic waste temporary such as in Arjuna Estate, there are hazardous and toxic waste symbols on pesticide ingredients and OHS warnings such as the use of PPE.

From interviews at harvesting activities, it was found that the foreman who is also a first aid officer, explained the functions of the first

aid worker and showed the contents of the first aid kit. The contents of the first aid kit are shown in complete and good condition which are monitored every month and the use of first aid is periodically carried out by training, for example, which was held on May 14, 2022 at Club House PT BLP which was attended by 38 participants.

Based on field visits to estates and mills, it was found that the company has an evacuation route as well as a gathering point in the event of an emergency. In addition, the company also informs the auditors of areas that have a high risk potential prior to the field visit.

6.7.3

The company also shows the identification of PPE needs which was approved by PC Central Kalimantan 1 on February 2, 2022 which lists the PPE requirements for each operational activity and the lifetime of the PPE. In addition, the company periodically also provides PPE to employees as was done on January 17, 2022 at Semeru Estate which was given to 15 chemist staff consisting of shoes, glasses, apron and gloves.

Based on field visits and interviews with workers, it was found that workers had fully used the free PPE provided by the company, for example for harvest workers, namely helmets, shoes and glasses, etc. Employees also conveyed the mechanism for replacing PPE if there was damage.

Based on field visits to rinse houses and hazardous and toxic warehouses, it was found that there was already an MSDS in Indonesian for each chemical as well as sanitation facilities for chemical applicators such as bathrooms, washing areas and clotheslines.

The company also appoints personnel in monitoring and evaluating OHS who position themselves as sustainability assistants as well as secretary of the OHS Committee who has attended general OHS expert training.

6.7.4

As a follow-up to the findings in the ASA-2 assessment, the auditor conducts verification regarding compliance with the provision of health and employment insurance facilities to workers. The company has registered all employees into work accident insurance, namely employment insurance. This can be proven by paying employment insurance contributions every month, for example employment insurance payments in May 2022 PT Bumilanggeng Perdanatrada (Estate) and PT BW Plantation (EHP POM) have been paid. Detailed payment information as follows:

- National Health Insurance (*BPJS Kesehatan*)
 - PT BW Plantation (EHP POM): Payment is made on May 5, 2022 for 118 workers.
 - PT Bumilanggeng Perdanatrada: Payment is made on May 20, 2022 for 1.284 workers.
- National Health Insurance (*BPJS Ketenagakerjaan*)
 - PT BW Plantation (EHP POM): 114 workers and dependents.
 - PT Bumilanggeng Perdanatrada: 894 permanent workers and dependents.
 - PT Bumilanggeng Perdanatrada: 739 contract workers and dependents.

Based on document review, all workers have been registered in the accident insurance. Then, based on interviews with workers, it is known that the company provides health insurance to employees, workers already know BPJS register number and hold the BPJS card as well. The company can also show proof of work accident claims to agencies related to the conditions of work accidents experienced by workers during 2021. In addition, for health care, the company provides clinical facilities and employees can seek free treatment.

6.7.5

The company also appoints personnel in monitoring and evaluating OHS who position themselves as sustainability assistants as well as secretary of the OHS Committee who has attended general OHS expert training.

Work accident statistics have been documented in the Quarterly OHS Committee Work Program such as in the January-May 2022 period which has been reported to the Manpower and Transmigration Office which includes LTA, FR and SR, including the following:

- LTA : 66
- FR : 1.16

• SR : 15,21

There were several lost working hours during that period, due to employees experiencing work accidents such as sprains, thorns, etc. Employees who experience work accidents will be treated at the company polybund and monitored by company doctors or nurses until they can return to work.

Status: Comply

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

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

7.1.1
The company already has pest and disease monitoring and control procedures as stated in the Agronomy Technical Guide no. Document: MAN-UOM-001 Chapter 7 about Pests and Diseases. This SOP explains that pest control must be based on the concept of Integrated Pest Management (IPM). Pest control uses a holistic or comprehensive approach by combining ecological, biological, physical and chemical approaches. Chemical control as a last step or in the event of an uncontrolled pest population explosion. In applying the integrated pest concept, early detection is the most important basis. This SOP also explains that the critical threshold can be defined as the average population level of healthy larvae per midrib, at which control measures must be taken in populations above this average. Critical thresholds for controlling pests and diseases are as follows:

- The critical threshold for leaf-eating caterpillars is 10 heads/midrib from the observed sample.
- The critical threshold for rat is 5% of the observed sample.
- The critical threshold for termite is 4 trees/ha from the observed sample.

The pest and plant disease census is carried out every 2 months, for example in the 2021 pest and disease census it was found that there were *Oryctes rhinoceros* attacks that exceeded the critical threshold, namely > 5 head/ha, so the company carried out biological control using pheromones placed in each block. Meanwhile, rat attacks are still below the threshold, this is because the company breeds natural predators, namely owls.

The company also applies biological pest control methods such as planting beneficial plants such as Cassia tora, which is a natural habitat for leaf-eating insect predators. Based on interviews with workers, it can be concluded that workers understand the technical census of plant pests and diseases and how to control them and are regularly trained by assistants.

7.1.2
Based on the results of a review of beneficial plant monitoring documents and interviews with company management, it is known that the company uses owls and Cassio tora plants as biological control agents. Based on the regulations in force in Indonesia, it is known that this species is not an invasive species.

7.1.3
The company shows the technical agronomic guidelines No MAN-UOM-001 version 1 which was valid in January 2017 in chapter 7 on pests and diseases which explains the census mechanism, threshold values and methods of controlling plant pests and diseases. From the control in question, no control was found using fire, but using an ecological, biological, physical and chemical approach.

Status: Comply

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

7.2.1
The company already has procedures for monitoring and controlling pests and diseases as stated in the Agronomy Technical Guidelines no. Document : MAN-UOM-001 Chapter 7 about Pests and Diseases. This SOP explains that pest control must be based on the concept of Integrated Pest Management (IPM). Pest control is carried out in 2 rotations using a holistic or comprehensive approach by combining ecological, biological, physical and chemical approaches. Critical thresholds for controlling pests and diseases are as follows:

- The critical threshold for leaf-eating caterpillars is 10 tails/midrib from the observed sample.
- The critical threshold for mice is 5% of the observed sample.

- The critical threshold for termite is 4 trees/ha from the observed sample.

The company uses pesticides registered with the Pesticide Commission. Based on records of pesticide use for the period Jan 2021 – May 2022, the pesticides used by the company are for example as follows:

Trademark	Active Ingredients	Content A.I	License Number	Validity Period
Kleen Up	Glifosat	480 g/l	RI. 0103011989819	12 Desember 2026
Metafuron	Metil Metsufuron	20%	RI. 01030120011579	21 Desember 2026
Starane	Fluroksipir	29%	RI. 0103011988854	30 Agustus 2023
Garlon	Triklopir	670 g/l	RI. 0103011984695	11 Oktober 2023

7.2.2

The pesticide application program is contained in the annual work plan which is then translated into monthly work plans and daily work plans. Documentation of the recording of pesticide use in monitoring the use and toxicity of pesticides for the period January-December 2021, such as:

Arjuna Estate

Active Ingredients	Material Use (litre)	Application Area (Ha)	Total a.i (gram)	a.i/ha (gram/ha)
Glyphosate	972	4,644	0,000494	0,000106
Methyl Metsulfuron	45	3,552	0,004456	0,001254

Semeru Estate

Active Ingredients	Material Use (litre)	Application Area (Ha)	Total a.i (gram)	a.i/ha (gram/ha)
Glyphosate	761	3,557	0,000631	0,000177
Methyl Metsulfuron	40	3,142	0,005013	0,001595

7.2.3

The company shows records of the implementation of pest monitoring and control, including:

- Based on the beneficial plant monitoring document, it is known that the company has utilized the beneficial plant as one of the integrated pest control implementations including Antigonon, Cassia tora and Turnera. From the results of field visits, for example in Block D36 Arjuna Estate, Antigonon type beneficial plant is available which is planted on the side of the road and is in good condition.
- Based on the monitoring document of owl cages, it is known that the company has used Tyto alba as one of the biological pest control methods, for example in Semeru Estate with a total of 3 gupons. From the results of field visits, for example in Block G25A, it is known that the owl cages are in good condition and are active.
- Based on the pest census records and the results of field visits, for example in block F42 Arjuna Estate, signs of horn beetle attack were found and the company has also carried out control by installing pheromone traps.

The company shows records of pesticide use as follows :

Arjuna Estate

Trademark	Year 2020		Year 2021	
	Application Area	Used (ltr)	Application Area	Used (ltr)
Triclopyr	1,417	164	1,314	341
Glyphosate	4,644	972	6,401	1,717
Methyl Metsulfuron	3,552	45	5,622	93
Fluroxipir	13	1	-	-
Paraquat	213	64	-	-

Semeru Estate

Nama Dagang	Tahun 2020		Tahun 2021	
	Application Area	Used (ltr)	Application Area	Used (ltr)
Triclopyr	1,068	163	3,144	277

Glyphosate	3,557	761	6,475	462
Methyl Metsulfuron	3,142	40	6,329	462
Paraquat	389	57	-	-

Based on the review of the pesticide use document, it is known that there is a reduction and an increase in the use of pesticides. The increase in the use of pesticides was due to the delay in the application of chemicals in semester 2 2021 due to high rainfall, while the decrease in the use of pesticides was due to the prohibition on the use of paraquat pesticides.

7.2.4

Based on field observations and document verification, it can be show that the company does not use pesticides prophylactically to control plant pests and diseases.

7.2.5

The company has shown documents on the use of pesticides used by the company during 2020-2022. The document explains the name of the pesticide, active ingredient, Lethal Dosage 50, WHO class, registration number, distribution permit date, and the amount of pesticide used. Based on the document, it is known that the company did not use pesticides with the active ingredient paraquat in April 2020.

In addition, the company has also shown an internal memo from the Head of Applied Research & Technical Services number: 5.023/ARTS-COO/RSPO/Herbicide/III/20 dated March 9, 2020 regarding herbicides to replace the active ingredient paraquat. Based on the pesticide use document for the period 2020 and 2021, it is known that since the internal memo was issued there has been no use of pesticides with the active ingredient paraquat for controlling fern weeds.

7.2.6 & 7.2.7

The company already has procedures for handling chemicals as stated in the Agronomy Technical Guidelines No. Document: MAN-UOM-001 Chapter 8 on the use of chemicals that describes the mechanism of storage, handling and mixing of chemicals as well as first aid in poisoning.

The company also periodically conducts chemical application training to employees, as shown on May 29, 2021, which was attended by 30 participants at Club House PT BLP. Based on interviews with workers, it can also be concluded that workers understand the technical application of chemicals as well as the hazards and risks associated with chemicals. In addition, the workers who were found had used the free PPE provided by the company in full, in accordance with identification and understanding of the mechanism for replacing PPE if there was damage.

Based on field visits to rinse houses and hazardous and toxic warehouses, it was found that there are product labels and MSDS in Indonesian for each chemical and the placement of chemicals has been arranged based on the trade name and type of chemical. Furthermore, the rinse house also has PPE and sanitation facilities for chemical applicators such as bathrooms, washing areas and clotheslines.

7.2.8

Companies can show documents for recording and monitoring used pesticide containers by using a logbook of incoming and outgoing goods at the Agrochemical warehouse. In addition, the company also has a pesticide storage procedure contained in the SOP for the Management of Hazardous Chemicals Number SOP-OTH-F3-007 dated January 10, 2019. The SOP describes procedures for chemical management, chemical storage, storage provisions, use of chemicals, transfer, chemical leak or spill, open vessel or tank, expired product, first aid, Training Program, Things that must be considered to prevent chemical spill/leakage, Storage of required packaging and diesel tank. The company has also conducted socialization to employees regarding the prohibition on the use of hazardous waste packaging including used pesticide packaging on April 2, 2022.

Based on field observations at the agrochemical warehouse and the hazardous waste storage area at Arjuna Estate, it is known that the pesticide storage area is specially provided with adequate ventilation and an isolated location. Used pesticide packages classified as Hazardous Waste were also found stored in a well-monitored Hazardous Waste storage warehouse which was then handed over to licensed collectors.

Based on interviews with pesticide application officers at Arjuna Estate and Bromo Estate, it was found that all containers used for pesticide packaging were returned and sent to the Hazardous Waste Warehouse and were not used for any other purpose other than pesticide application activities. All used packaging containers, work tools and work clothes are stored in a special storage area, so that no contaminated items are taken home. However, based on the results of field observations and document verification, it was found that no pesticide waste was found in the Hazardous Waste Warehouse. This is a non-conformity with Indicator 7.3.2

7.2.9

Based on the results of interviews with management and document review, it is known that there is no aerial spraying pesticide application at PT BLP.

7.2.10

The company shows the pesticide applicators listed in the employee lists of each estate. In addition, the company has a plan for regular health checks for all employees and specifically for employees who have high potential risks, such as chemical applicators and engine room operators.

The last special medical examination was carried out in 2022 in collaboration with the Kumala Clinic. The examination, for example, was carried out at Arjuna Estate on January 25-28, 2022 with inspection parameters namely CHE, audiometry and spirometry which was attended by 96 employees. From the results of the examination, there were no employees who had health problems.

The last periodic health check was carried out in 2021 which was carried out by the company internally. The examination was carried out on all employees on 24-26 May 2022 with inspection parameters namely weight, blood pressure, pulse, breath, body temperature and physical examination (head, neck, chest, stomach, hands and feet). From the results of the examination, there were no employees who had health problems.

7.2.11

The company already has procedures for handling chemicals as stated in the Agronomy Technical Guidelines No. Document: MAN-UOM-001 Chapter 8 on chemical use guidelines which explain the prohibition of pregnant and lactating women to carry out storage, handling and mixing of chemicals

Based on field observations and interviews with workers, it was found that the H1 and H2 leave were granted by the plantation management in accordance with the recommendations from the company clinic. Pregnancy detection is carried out by the company's clinic every semester with a rapid kit test to detect pregnancy and/or is informed directly by the employees themselves. Furthermore, the applicator also states that those who are detected positive will not be allowed to work with agricultural chemicals and will be shifted to manual maintenance work.

Status: Comply

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

7.3.1

The company has identified waste resulting from operational activities contained in the Waste Type Identification document for Estate and Factory. The identification is grouped based on the activity that generates the waste, the name of the waste, the code of the waste, the type of solid or liquid, and its management. The determination and classification of waste codes uses the reference to Government Regulation number 101 of 2014. The company also has several procedures related to waste management and utilization which are listed in several documents, including:

- SOP for Waste Management and Monitoring Number SOP-OTH-F3-004 dated January 10, 2019.
- SOP for the Management of Hazardous Chemicals Number SOP-OTH-F3-007 dated January 10, 2019.
- SOP for Greenhouse Gas Mitigation Number SOP-OTH-F3-015 dated January 10, 2019.
- Work Instructions for Handling Used Pesticide Packaging.
- Work Instructions for Handling Hazardous and Toxic Waste (Solid and Liquid).
- Clinical Waste Handling Work Instructions.

In the realization of waste management, it is divided into several types based on the characteristics of the waste it produces, including: **Hazardous and Toxic Waste**

In the management of hazardous and toxic waste, the company does not reuse it, but only temporarily stores it located at Bedaun Mill and Arjuna Estate. The company also has a licensed hazardous waste storage area, including:

- Hazardous and Toxic Waste Management Permit for PT EHP Bedaun Mill unit based on the Decree of the Kotawaringin Barat Regent Number 660/6/DLH.IV/TPS//IV/2016 dated 12 April 2016 which is valid for 5 years from the date of stipulation. The location of the Hazardous Waste Warehouse is in Bedaun mill. Regarding the expiration date, it becomes OFI on indicator 2.1.1.
- Hazardous and Toxic Waste Management Permit for PT BLP based on the Decree of the Kotawaringin Barat Regent Number 660/538/DLH.3/IV/2020 dated 21 April 2020 which is valid for 5 years from the date of stipulation. The location of the Hazardous Waste Warehouse is in Arjuna Estate.

The waste stored in the temporary storage warehouse will then be transported by a licensed party once a year. The latest transportation is proven through the Electronic Manifest document and the official report of transportation which was carried out on April 8, 2022 by PT Semesta Langgeng Sentosa which is a licensed party. The company can show a cooperation agreement with the carrier, which is based on the document of the Cooperation Agreement Number 009/SPK/SLS-BP/II/2022 which was made on January 4, 2022 and is valid for one transportation. The company can also show the legality documents of the carrier, such as a valid transportation permit from the Ministry of Environment and Forestry, a valid permit for special goods transportation from the Ministry of Transportation, a valid Business Identification Number and a Cooperation Agreement between the carrier and the licensed processor and/or beneficiary.

Companies can also show documents for storing and handling Hazardous Waste in accordance with their SOPs and Government Regulation Number 101 of 2014. These documents include Manifest, balance sheet, and logbook. Based on the results of the document review by comparing the manifest, the balance sheet and the logbook, it can be seen that the data on waste transported on March 22, 2022 was in accordance with the data recorded in the balance sheet and logbook for the period before the transportation was carried out. Similarly, the comparison between the months after the transportation was carried out (April 2022) which started from empty. The company has also reported the results of hazardous waste management which is carried out every quarter with evidence of Reporting Documents of Hazardous Waste Management Reports of PT EHP and PT BLP for the period of Quarter IV 2021 which are reported to the relevant agencies as described in indicator 1.1.2. However, in terms of management, there are still discrepancies so that it becomes NC in indicator 7.3.2.

Non-hazardous and toxic waste

Non-hazardous waste such as domestic waste and used fertilizer sacks is managed in the form of reuse for goods that can still be used. In addition, waste that cannot be reused will be collected, if it still has economic value such as scrap metal and used tires, it will be sold to parties who cooperate with the company. Non-hazardous waste that cannot be reused will be disposed of in landfills. Transportation of non-hazardous waste from employee housing or emplacement areas is carried out once a week and immediately disposed of in a landfill, and when the landfill is full, it will be stockpiled and put-up signboards marking the opening and closing dates. The company has a policy regarding the prohibition of burning waste, including in landfill areas.

The results of field observations in the landfill and emplacement area showed that there were no traces of combustion, all domestic waste was disposed of in waste collection tanks scattered throughout the building. The results of interviews with residents of the emplacement also stated that the company routinely carried out socialization related to domestic waste management, either directly through meetings, or indirectly by installing signboards prohibiting burning trash and littering.

Liquid, Solid and Air Waste

Solid waste from the FFB processing process in the form of shells and fiber is reused by the company as a substitute for fossil fuels (diesel) for power generation in boilers, while 100% of empty fruit is used for fertilizer substitution. Data on solid waste utilization is explained in more detail in indicator 7.9.1. The company also utilizes POME by applying it to the Land Application and not dumping it into water bodies. The company also already fixed related flatbed management that become OFI in the previous audit for example, they can show the schedule related to maintenance of flatbed for 2 times a year. The regulation and management of POME are explained in more detail in indicator 7.8.3. As for air waste, the company has not made a common use for air waste, namely the Biogas Plan, so far, the management related to air waste has only been limited to measuring air quality from waste-producing sources such as WWTP, Boilers and Gensets.

7.3.2

Based on an interview with the Bedaun Mill and Estate Hazardous Waste Warehouse Management Manager, it was found that they

had an understanding of the handling of waste disposal, especially hazardous waste and domestic waste and its management as regulated in the company's procedures. The waste warehouse manager can also explain the technicalities related to waste management, such as the treatment of incoming and outgoing goods, recording and reporting, transportation period, handling in the event of a work accident and other actions regulated in company procedures. The results of the verification of the Hazardous Waste Logbook document also show that all incoming and outgoing waste has been properly documented and in accordance with its actual conditions. All hazardous waste generated in each division will be sent to the hazardous waste warehouse a maximum of 1 week from the date the waste was generated, previously stored in a special room that has been provided in each division office.

The results of interviews with workers who live in the emplacement area also stated that the waste management carried out by the company was very good and regular. Trash cans are provided properly, all waste disposal facilities have also been provided by the company such as organic and non-organic waste bins that will be replaced if damaged, hazardous waste warehouses and landfills. The resource persons also understand very well how to separate the types of waste they produce and what types of waste should not be reused. The respondent's understanding of waste management is the result of routine and consistent socialization and training as evidenced by the minutes that were held on August 4, 2021 to all staff and employees. However, based on the results of field observations, document reviews and interviews, the following information was obtained:

Bedaun Mill

- Based on the results of field visits to the Hazardous Storage Bedaun Mill area, information was obtained that there was no stored B3 contaminated used packaging.
- Based on the results of interviews with the person in charge of the warehouse, information was obtained that no contaminated packaging had entered the TPS for the period after the last transport.
- Based on the analysis of the Manifest document, it is known that the last Hazardous transportation was carried out on April 8, 2022 or 2 months before the audit was conducted.
- Based on the results of the analysis of the Logbook documents for July 2021 – May 2022, information was obtained that there was no B3 packaging waste that went to the Storage.
- Based on the results of field visits to WTP areas, information was obtained that the company uses chemicals in the water treatment process. In addition, for data on the use of chemicals in 2021, information was obtained that the company used 2,339 Kg of lubricant and 10 Kg of Cycle-Hexane chemicals.

Arjuna Estate

- Based on the results of field visits to the Hazardous Storage Arjuna Estate area, information was obtained that there was no stored Hazardous contaminated used packaging. In addition, no symbols and labels were installed in the Hazardous Storage area.
- Based on the results of interviews with the person in charge of the warehouse, information was obtained that the used pesticide packaging was reused to collect water.
- Based on the analysis of the Manifest Hazardous Storage Arjuna Estate document, it is known that the last Hazardous Storage transportation was carried out on March 8, 2022 or 3 months prior to the audit.
- In the Logbook document of Hazardous Storage Arjuna Estate for March – May 2022, information was obtained that there was 48 pieces of Hazardous packaging waste that entered the Storage.
- The results of the interview with the management stated that the transportation is carried out every 1-year period.
- The results of the interview with the management also stated that the packaging contaminated with B3 such as jerry cans of pesticides and fertilizer sacks was reused. However, the company has not been able to show technical guidance documents related to the reuse of Hazardous contaminated packaging (Jerry cans of pesticides, fertilizer sacks, and others).
- Based on the results of the analysis of the SOP document Number IKA-OTH-F3-04-01 related to the management and monitoring of B3 waste, it also does not explain the use of Hazardous Waste as regulated in PermenLHK Number 18 of 2020 concerning the use of hazardous and toxic waste.

Regarding the information above, the company has issued circular letter number 022/STT-KALTENG 1/SE/VI/2022 regarding the prohibition of reuse of used pesticide packaging. However, the company has not been able to provide a clear justification regarding the reuse of the used packaging.

By the time the ASA-1 audit was carried out, the management of Hazardous waste had become a non-conformance and the company had taken corrective and corrective actions to meet the non-conformance. However, when the ASA 2 + ASA 3 audit was carried out, it was still found that there was B3 waste that was not managed in accordance with applicable SOPs and regulations.

Non-conformity No. 2020.04

Based on the evidence obtained, it is concluded that the company has not been able to implement Hazardous Waste management as regulated in company procedures and applicable laws and regulations, including:

- SOP Number SOP-OTH-F3-0004 concerning Waste Management, Monitoring and Utilization which states that the waste used for pesticide/herbicide packaging is managed by storing in TPS and handed over to collectors.
- Decree of the Head of Bapedal Number 5 of 1995 and PermenLH Number 14 of 2013 which requires the provision of symbols and labels for all Hazardous waste management activities.
- PermenLHK Number 18 of 2020 concerning the utilization of hazardous and toxic waste.

7.3.3

The company does not carry out open burning to destroy waste, this can be proven from field observations in residential areas and the Arjuna Estate and Bromo Estate Landfills, no traces of burnt waste were found. The results of interviews with employees also stated that they had never burned waste, because they were aware of the prohibition on burning activities and the sanctions they would receive if they burned them. Garbage from housing is disposed of in the bins that have been provided, then transported once a week and disposed of in landfills and then buried when it is full. The results of field observations in employee housing areas also show many warnings to prohibit waste burning activities as well as the dangers that can arise from burning activities. Interviews with management also explained that the regulations regarding the prohibition of burning have been understood by all workers and strict action would be taken if they violated them.

7.3.2 Status: Non-conformity No. 2022.04

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 and 7.4.4

The company has agronomic technical guidelines with the number MAN-UOM-001 ver.1 effective January 2019 chapter 6 explaining fertilization based on the results of soil and leaf analysis. The company also shows records of fertilization realization programs for the 2020-2021 period, for example as follows:

Estate	Fertilizer Type	Recommendation		Realization		Production (Ton)
		Used (Ton)	Area (Ha)	Used (Ton)	Area (Ha)	
Arjuna	MOP	1,417	3,513	446	80	52,793.83
	UREA	1,076	3,513	641	80	
	NPK	1,203	3,513	286	80	
Semeru	MOP	1,153	3,023	440	27	44,808.36
	UREA	870	3,023	469	27	
	NPK	1,024	3,023	382	27	

Based on the fertilizer recommendation and realization report for the 2021 period, it can be concluded that the fertilizer realization in 2021 as a whole has not been realized due to high rainfall and the company's finances have not been able to meet the needs for fertilization applications. In this regard, the company is committed to carrying out further applications in 2022.

7.4.2

The company has a SOP-EHP-R & D-02 procedure effective on March 3, 2013. The procedure states that leaf sampling The procedure for taking soil and leaf samples is regulated in SOP-EHP-R&D-02 effective March 3, 2013 The procedure states that leaf sampling is carried out annually while soil samples are every five years.

Records of soil and leaf samples shown by the company include the following:

- Results of Soil analysis Number 06/TANAH/LAB.RISET-KALTENG 1/XI/2018 dated November 21, 2018 published by the Laboratory Research Center PT EHP for a total of 70 samples. The parameters analyzed were N, P, H₂O, Moisture, C-organic, % C/N, H, Al and acidity.
- Leaf analysis results, for example on the results of the analysis Number 010/DAUN/LAB.RISET-KALTENG/X/2021 dated October 13, 2021, published by the Laboratory Research Center PT EHP for a total of 20 samples. The parameters analyzed include Moist, N, P, K, Mg, Ca, B, Cu and Zn.

7.4.3

As part of the nutrient recycling strategy, the company utilizes empty bunch recycling and utilizes liquid waste that is used as organic fertilizer. For example, it can be seen from the realization of empty bunch and liquid waste applications at Arjuna Estate in January – April 2022, among others as follows:

Utilization of Liquid Waste

No.	Month	Application (M3)
1	January	11,476
2	February	12,377
3	March	13,281
4	April	11,339
Total		48,473

Distribution of EFB utilization:

No.	Month	Application (Ton)
1	January	573
2	February	1,013
3	March	1,572
4	April	419
Total		3,577

Based on the data shown, the company has been recycling nutrients as an effort to limit the use of non-organic fertilizers. This is also in line with field observation.

Status: Comply

7.5

Practices minimize and control erosion and degradation of soils.

7.5.1

The company presented the 2014 Land Survey and Land Suitability Document for PT Bumilanggeng Perdanatrada, which was carried out by the Research Team and the Eagle Group Higher Plantation Department. The document states that there are 5,488.45 ha of peat land or 50.8% of the total area.

In addition, there is also a peat depth map which divides the depth into 3 types, namely shallow (196 ha); Deep Enough (4,889 ha); and In (403 ha). The document has been equipped with a map of the distribution and depth of peat with a scale of 1:35,000 to 1:250,000, but the area managed as a cultivation area is 4,475 hectares in accordance with the area statement.

7.5.2 & 7.5.3

The company has demonstrated procedures related to the management and monitoring of conservation areas with the number SOP-OTH-F3-012 which has been in effect since January 10, 2019. The SOP describes the boundaries of conservation areas, namely:

1. The boundaries of the conservation area on the river border are determined as follows:
 - A river with a river width of 2 – 50 meters has a river border of 50 meters wide to the right – left of the river.
 - Rivers with a river width of more than 50 meters have a river border of 100 meters to the right and left of the river.
2. The boundary of the conservation area for the lake is set at 200 meters from the edge of the lake.
3. The boundaries of the conservation area for springs are set at 100 meters around the springs.

4. Land with a slope of > 40% (22.50) must be conserved and must not be cleared.

The company also shows records and maps of land clearing and arrangement, which are included in the document, including the operational map of PT Bumilenggang Perdanatrada with a scale of 1: 50,000 which contains information on block boundaries, housing locations, roads, rivers and emplacements.

Based on the results of the document review and interviews with management, it is known that the land clearing at PT Bumilanggeng Perdanatrada was carried out by the previous company, before being acquired by the Eagle High Plantation Group. In the case of new land clearing, the area within these boundaries may not be cleared. If oil palm has been opened and planted with oil palm, it is not allowed to carry out chemical treatment (fertilizers and pesticides) in the area and rehabilitation is carried out during replanting.

In addition, there was no replanting at the time of the assessment, this is because the company last replanted in 2014 in accordance with agronomic guidelines and conservation area management.

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 and 7.6.2

The Company has a land class and land suitability survey document which was conducted on 3 July 2014 (for land area) and 13 June 2014 (for peat depth survey). Based on the survey results obtained as follows:

- According to the depth, peat is divided into 3 classes: shallow 196 ha; covers a sufficient area of 4889 ha; and Deep covers 403 ha.
- According to land suitability class, it is divided into 6 classes, namely S2n covering an area of 1172.4 ha; S3n covering an area of 4,089.64ha; N1 covers 4889 ha; N1tn area of 33.01 ha; N2s covering an area of 403 ha; and N2rtn covering an area of 26 hectares.

As explained in the land survey and land suitability class of PT BLP, it is known that the area of peatland is 50.8% or 5,488.45 ha. While the identified slope is 0 - 8% with flat to wavy criteria.

7.6.3

The existence of a land map containing information on soil classification, texture, drainage, limiting factors and information on suitability for oil palm plantation development has helped the company to organize blocks, roads, drainage, bridges, etc. The company also has a road maintenance program which is equipped with adequate infrastructure and facilities to carry out the work. According to the results of the field visits, the roads are in good condition and the harvested FFB is transported smoothly to the mills. Oil palm in the operational area is the first cycle, not replanting or new planting activities.

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

Based on the planting year distribution document, it is known that the youngest palm age is 2014, after that there is no expansion area for the development of new planting.

7.7.2

The company has conducted an inventory of peatlands according to the RSPO peat inventory template and has submitted a report to the RSPO as evidenced by the email that Devaladevi Sivaceyon (devaladevi@rspo.org) sent to Melani (melani.tantr@rajawali.com) on 12 March 2020 with the email subject, namely the Peat Inventory of PT Bumilanggeng Perdanatrada RSPO, but based on the statement document of the area of PT BLP and the map of peat and mineral areas it is known that the area of peatland is 4,474.78 Ha, while in the summary of the report on the RSPO peat inventory of PT Eagle High Plantation Tbk which has been submitted to RSPO on 12 March 2020 revealed that the total reported area of peat was 3,202 Ha, with details of planting area of 3,050 Ha and peat rehabilitation area of 152 Ha.

The company then revised the peat inventory on July 23, 2021, which was sent to the RSPO secretariat and it was replied on July 27, 2021. From the results of this communication, it was concluded that the peat inventory area with the company statement area was the same, which was 4,474.78 Ha.

7.7.3

For the number and placement of piezometer stakes, the company refers to the Director General of PPKL No. SK.93/PPKL/PKG/PKL.0/8/2019 regarding the determination of ground water level compliance points and PT BLP rainfall monitoring station points. In addition, the company also shows records of peatland management including:

- Subsidence monitoring for the period 2019-2022, it is known that the peat soil layer has decreased by 5.5 cm.
- Piezometer monitoring for the period of May 2022, it is known that the water level of the peat soil is 41.9 cm.

Based on these documents, it is known that the average water level is between 40-60 cm. The company's management explained that if the water level is not up to standard, the floodgates will be opened to reduce the water level.

7.7.4

SOP for Land Management and Monitoring of Peatlands Number SOP-OTH-F3-014 Version 2.0 effective January 10, 2019 which explains the measurement period and subsidence pile material. The company has 6 subsidence stakes and 20 piezometer stakes as well as supporting facilities and infrastructure for planting in peat areas such as water route maps, main ditches, collecting ditches and sluice gates to regulate water levels in peat areas.

Based on the document study, it is known that the average water level is between 40-60 cm. The company management also explained that there are no areas with flood conditions, because if the water level is not up to standard, the floodgates will be opened to reduce the water level.

7.7.5

Based on the distribution of planting years in peat areas, it is known that the distribution of TT is from 2000 – 2002, 2006 – 2010, and 2012 – 2014. From these planting years, it is known that the planting age in peat areas ranges from 8 – 22 years and the plan for replanting in peat areas will implemented in the next five years starting in 2027.

In accordance with the provisions in the RSPO Drainability Assessment Procedure, it is stated that at least five years before replanting or for plants in peat areas that are 15 years old, an initial Drainability Assessment is carried out. Thus, the company has the opportunity to ensure that the initial Drainability assessment is carried out in accordance with these provisions. (OFI)

7.7.6

The company shows SOP-OTH-F3-014. Version 2.1 dated January 2, 2020 regarding Water Management of Peat Areas effective February 1 2014. The procedures include, among others, explaining the manufacture and installation of piezometers, construction of dams, and maintenance/washing of mechanical ditches. The results of the field visit to the F34B and E 6C Arjuna Estate blocks, it is known that the water level at the watergate is 41 cm.

For the number and placement of piezometer stakes, the company refers to the Director General of PPKL No. SK.93/PPKL/PKG/PKL.0/8/2019 regarding the determination of ground water level compliance points and PT BLP rainfall monitoring station points. In addition, the company also shows records of peatland management including:

- Subsidence monitoring for the period 2019-2022, it is known that the peat soil layer has decreased by 5.5 cm.
- Piezometer monitoring for the period of May 2022, it is known that the water level of the peat soil is 41.9 cm.

Based on these documents, it is known that the average water level is between 40-60 cm. The company's management explained that if the water level is not up to standard, the floodgates will be opened to reduce the water level.

The company also explained that spraying is only done selectively on peatlands. This is to maintain vegetation in the peat area to maintain moisture and reduce evaporation in the peat area.

7.7.7

Based on a document review and interview with management, the company does not have any reserves in the peat area and all

conservation areas are in the mineral area.

Status: Comply

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

7.8.1
Based on the 2016 RKL-RPL Addendum document, the results of the 2013 HCV identification, as well as river flow maps and water sources, it can be seen that there are no water sources in the operational area but only artificial canals. Based on the document, it is known that the water source management plan is to test the quality of surface water at the Upstream and Downstream canals every 6 months and drill wells every 1 year. All tests were carried out by a KAN accredited laboratory (LP-001-IDN). Related to this, the company shows the results of testing the quality of surface water for the period of semester 2 of 2021 which was carried out on October 26, 2021. The company carried out surface water testing with 34 indicators carried out at 5 sample points, namely the Bakung River, Kumai Hulu River, Kumai Hilir River, Roko River and Seluang River.

Based on the test results data for the Semester 2 2021 period, there are parameters that are above the quality standard, namely COD on the Upper and Lower Kumai Rivers. The results of interviews with companies related to the high value of COD because the river's water source comes from peat and swamps. The results of the analysis of test data for the last 2 years show that several parameters have fluctuated, this is due to the sampling period carried out in different seasons. This is very influential because the company's location is on the coast and there are high and low tides and the intensity of the rainy season. In addition, the Kumai River is also outside the company's operational area where upstream there are already many plantations and residential areas, the main river transportation route and the company's location on the coast.

The results of interviews with workers stated that there were never any complaints about river water, they used the river only for transportation and not for consumption or daily needs. The results of interviews with the community around the company and related agencies also did not reveal any negative issues related to the condition of the river water. In addition, the company has also made efforts to control potential pollution through measuring the level of river water levels and providing embankments around the WWTP which can accommodate ±150,000 m3 of wastewater to anticipate damage to the WWTP embankment.

The unit of certification also does not limit access to clean water, and all workers also have access to adequate clean water. Based on the results of field observations in the residential area of Arjuna Estate as well as interviews with fertilizer workers, spraying workers, and harvest workers, information was obtained that clean water facilities for housing were obtained from drilled wells and rainwater storage facilities. Drinking water testing is also carried out by the company to see the quality of drinking water taken from drilled wells carried out by a KAN accredited laboratory (LP-001-IDN) on September 9, 2021. The results of testing the quality of drinking water also show that all parameters of the test results are still in accordance with the standards. The applicable quality is the Regulation of the Minister of Health Number 32 of 2017.

The company also has a procedure No. SOP-OTH-F3-012 concerning Management and Monitoring of Conservation Areas, which includes protection of river borders. Based on the results of document verification and field observations to several sampling locations, it shows that the company has carried out activities in an effort to improve water quality, including:

- Conduct outreach to all employees and the surrounding community to maintain water quality.
- Maintain the cleanliness of the environment around the water source and provide a sign prohibiting littering in the canal.
- Report the results of the examination in accordance with the provisions of the applicable laws and regulations.
- Testing the water quality of rivers and canals listed in the RKL/RPL report
- Management of erosion and surface water runoff, management of water in the lowlands and monitoring of surface water quality as stated in the implementation of RKL-RPL every semester.
- Waste water management using WWTP.
- Monitoring the use of water for palm oil processing and evaluating its use.

7.8.2
The company has procedures related to identification, management and maintenance of water sources and quality which are listed in several procedures, including:

- Procedure Number SOP-OTH-F3-012 dated January 1, 2019 concerning Management and Monitoring of Conservation Areas which explains the boundaries of conservation areas on river borders with a river width of 2-5 meters having river borders as wide

as 50 meters right – left of the river, conservation area boundaries for the lake set as wide as 200 meters from the lake shore, and others.

- Work Instruction Number IKA/30/BLP/2019 dated revision 01 dated June 1, 2021 regarding Protection of Water Sources and Quality. The SOP document contains guidelines for dam management, measurement of water levels in all types of canals, floodgate management, rainfall, and conservation.

The procedure also explains several things related to the management of river borders and other water sources, such as determining the width of river borders following Presidential Decree no. 32 of 1990. Related to OFI in previous audit, the unit certification already fixed it by putting the signboard in every riparian area, carried out border protection, carried out socialization to all parties involved in plantation operational activities to participate in carrying out water protection activities, making boundary markings, and monitoring water resources. The company also has topographic data in the form of maps with a scale of 1:75,000 covering the scope of certification. Based on the map, there are no rivers, lakes or springs within the company area. All water bodies within the company area are artificial canals with closed access. In addition, the company shows a topographic map showing that the slope level ranges from 0 – 8%. The results of document review and interviews as well as verification of the company's area through satellite imagery also show that all rivers have been identified and designated as HCV areas.

The company has also made efforts to manage water sources such as periodically monitoring the condition of river water from potential pollution and fires every month, testing surface water quality standards to ensure water quality is still within normal limits every semester, and marking the boundaries of chemical application areas with red coloration. In addition, the company also conducts socialization to employees and the surrounding community in conservation efforts which can be proven based on the minutes of socialization to workers on December 4, 2021 and to the community on March 1-2, 2022. Results of interviews with spraying and fertilizing workers in Arjuna and Bromo The estate also stated that they are aware of the rules regarding chemical application limits, prohibition of washing chemically contaminated items in water bodies and other activities that have a negative impact on water sources.

7.8.3

The unit of certification has facilities for the management of POME produced from palm oil processing with a capacity of 60 tons FFB/hour using WWTP. POME that has been managed at WWTP is then applied to land located in the company area. Before being distributed to LA, all POME is fed into the WWTP with a multi-feeding system which is then processed to reduce pollutant elements so that it is suitable for disposal into water bodies. The waste treatment facilities owned are 5 ponds consisting of 1 Cooling Pond, 2 anaerobic ponds, 2 aerobic ponds as POME reservoirs where the outlet is in the monitoring pond originating from the aerobic pond.

The company also has a Waste Water Utilization Land Application for PT EHP based on the Decree of the Head of the Environmental Agency of Kotawaringin Barat Regency number 503/004/LH/DPMPTSP.D dated March 13, 2020 which is valid for 5 years from the date of stipulation. There is an obligation in the permit document, namely to monitor the potential environmental impacts on a regular basis and ensure that the quality of the POME to be disposed of is in accordance with the applicable quality standards. The company can show the results of the recapitulation of the flow of POME to water bodies with a total of 174,323 m³ for the period 2021, or the equivalent of 478 m³/day.

To determine the feasibility of POME quality, the company conducts monthly testing using quality standards that refer to the Ministry of Environment Decree No. 29 of 2003. The company can show evidence regarding the results of POME quality measurements in the form of test results documents carried out by a laboratory accredited by KAN (LP-001-IDN). Based on the results of the analysis of the test results for the period January - December 2021, it shows that all parameters are in accordance with the applicable quality standards. This shows that POME produced from FFB management activities is feasible to be applied to land. The company has also reported the results of liquid waste management which is incorporated in the Environmental Management Report every 3 months and in the RKL-RPL report every 6 months to the relevant agencies as described in indicator 1.1.2.

However, based on the results of field observations in the Empty Bunch Area, it shows that the company does not have irrigation canals to accommodate leachate water generated from EFB accumulation activities. However, there is no actual potential for leachate contamination to be found in water bodies. Based on this, companies are encouraged to manage liquid waste in the form of leachate at the Empty Bunch Area location to anticipate environmental pollution. **OFI.**

7.8.4

The company already has a Surface Water Intake and Utilization Permit for PT EHP Bedaun Mill unit based on the Decree of the DPMPSTP of Kotawaringin Barat Regency Number 503/0001/IPPAP/DPMPSTP.D on 27 May 2019 and is valid for 3 years. In the document there is a provision for a quota of surface water intake of 25,000 m³/month. The water extraction location is located in the company's artificial reservoir. Regarding the validity period of the permit that has passed the time limit, it has become OFI in indicator 2.2.1. This is because the company is still having problems due to changes in the permit management system that must pass technical approval.

The company can also show documents recording daily water use, as well as the results of the recapitulation of water use for palm oil processing units every month, for example for the period January - December 2021. Based on surface water utilization data, the total water use for FFB processing is 219,810 m³ /year or equivalent to 1.30 m³/ton FFB. However, when calculating the overall water use, the total water use is 272,790 m³/year or equivalent to 22,732 m³/month, this indicates that there is no excess use of surface water from the valid permit.

The company can also show proof of payment of the water levy to the Regional Revenue Service Technical Implementation Unit (UPTPPD) for the period 2021 with a payment period made every year. An example of proof of payment of the latest water levy is based on proof of payment made on April 7, 2022 for a total water use in 2021 of 272,790 m³, the water tax paid is not only for the FFB processing process but for all water uses.

The results of field observations in the Water Treatment Plan (WTP) and Water Intake also show that the flowmeter used is still functioning properly. The results of interviews with officers responsible for WTP also show that operators are very understanding about how WTP work 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 Certification Unit has made efforts to increase the efficiency of the use of fossil fuels and optimize renewable energy, these efforts are also monitored and documented in the form of a document Conversion of Biofuel to Solar at Bedaun Mill for the period 2020 - 2021. The biofuel in question is solid waste in the form of shells and fiber which used for substitution of fossil fuels (diesel) as a producer of electrical energy using a boiler. The recapitulation of solid waste utilization for the period January – December 2021 shows that from 169,179 tons of FFB processed, it can produce biofuel in the form of 11,843 tons of shells and 21,994 tons of fiber, all of which are used for the combustion process in boilers or equivalent to 20% of the total processed FFB. The company also utilizes 100% of the EFB produced to be used as fertilizer substitution. The total EFB utilized in 2021 is 40,520 tons.

Based on the data analysis of the use of diesel fuel for FFB processing, information on the estimation of diesel fuel needed to generate electricity in the factory area is 747,437 liters/year or 7.12 liters/ton of FFB. However, due to the efficient use of diesel fuel which is substituted with biofuel, it can reduce the use of diesel to only 368,667 liters/year or the equivalent of 3.5 liters/ton of FFB. This shows that the use of biofuels can reduce the use of diesel by 50.67% for 2021.

The results of interviews with the company stated that this efficiency is very beneficial because it can reduce diesel consumption. Currently it is needed only to turn on the generator as the initial power plant. However, for 2021, the use of diesel fuel for the FFB process is relatively high because the stock of FFB processed is quite small, so that little biofuel is produced. Energy efficiency is also applied to all operational activities of the company by minimizing the use of fuel by contract workers, including all machinery and transportation operations. The total utilization of diesel fuel for 2021 is 149,972 liters where there is a decrease in diesel use from 2020 of 157,292 liters, this is due to boiler replacement and factory maintenance activities during 2020-2021 so that diesel usage is quite high. For 2022, it can be seen that the monthly use of diesel fuel has decreased by around 60% from 2021 because maintenance and boiler replacement have been completed. Currently, the company has not utilized methane gas to produce electricity.

Status: Comply

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

7.10.1

The Certification Unit has carried out an inventory of GHGs contained in the Greenhouse Gas Emissions Mitigation Program document for the period 2021, based on document analysis, it can be concluded that the company has identified the source of GHG produced by the Bedaun Mill unit and its suppliers. Identification of significant sources of GHG emissions are identified and mitigation plans have been developed by the company covering mills and plantations. Significant GHG emissions include land use change, POME processing, use of fertilizers and pesticides, use of fossil fuels for operations and transportation. The mitigation plans include, among other things, the correct dosage and application of fertilizers as recommended, reducing reuse and recycling, limiting the use of electricity, transportation and machine maintenance, as well as periodic air quality tests. The company has also reported the results of the GHG calculation to the public which was submitted to the RSPO GHG website.

Reduction of fossil fuels at Bedaun Mill has been carried out by using fiber and shells for fuel substitution. The company also uses POME to be applied to land with test results from the monitoring period January – December 2021 which show 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 has been entered into the RSPO GHG Calculator version 4.0. The summary of GHG emissions for the period January – December 2021 is as follows:

General Information

Association	No. of Estates/Plantations	FFB Processed (t)	Planted Area (ha)
Own Plantation	3	132,332	8,930.20
Group Plantation	2	24,207	2,235.18
3rd Party	6	12,639	0.00
Total	11	169,178	11,165.38

Summary Emissions

Description	Value	Unit	Description	Value	Unit
CPO	7.53	tCO ₂ e/tProduct	Oil palm planted on mineral soil	4,714.20	Ha
PK	7.53	tCO ₂ e/tProduct	Oil palm planted area on peat	6,451.18	Ha
PKO	0	tCO ₂ e/tProduct	Total oil palm planted area	11,165.38	Ha
PKE	0	tCO ₂ e/tProduct	Conservation area (Forested)	22.23	Ha
OER	21.74	%	Conservation area (non-Forested)	132.58	Ha
KER	3.70	%	FFB Production per hectare	15.15	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 e	tCO ₂ e/t FFB	Emission Source	tCO ₂ e
POME	24,479.69	0.14	PK from own mill	47,116.89
Fuel Consumption	385.33	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	47,116.89
Sale of PKS	0.00	0.00		
Sale of EFB	0.00	0.00		
Total	24,865.02	0.15		

Estate / Plantation Field Emissions and Sinks

Description	Emission (tCO ₂ e)			TOTAL
	Own	Group	3rd Party	
Emission Source				
Land Conversion	88,200.27	16,308.33	0.00	104,508.60
CO ₂ Emissions from Fertilizer	3,262.63	660.82	0.00	3,923.45
N ₂ O Emissions from Peat	36,669.29	11,622.84	0.00	48,292.13
N ₂ O Emissions from Fertilizer	3,912.40	798.45	0.00	4,710.85
Fuel Consumption	1,206.02	2.43	0.00	1,208.45
Peat Oxidation	155,383.26	84,775.25	0.00	240,158.51
Crop Sequestration	-83,602.14	-19,973.72	0.00	-103,575.86

Sequestration in Conservation Area	-203.85	0.00	0.00	-203.85
Total	204,827.89	94,194.40	0.00	299,022.29

FFB Supplier

Supplier Name	FFB Production by Estate/Plantation (t)	FFB Supplied by Estate/Plantation (t)	Percentage of FFB supplied by Estate/Plantation (%)
Arjuna Estate (ARJE)	52,794.00	52,794.00	100.00
Semeru Estate (SMRE)	44,808.00	44,808.00	100.00
Bromo Estate (BRME)	34,730.00	34,730.00	100.00
Arjuna Plasma (ARJA)	2,098.00	2,098.00	100.00
Bromo Plasma (BRMA)	22,109.00	22,109.00	100.00
Haji Salman ponadin	830.00	830.00	100.00
Edi Efendi	2,239.00	2,239.00	100.00
CV.HOSANA	3,948.00	3,948.00	100.00
CV. APT	1,300.00	1,300.00	100.00
CV. MBU	4,196.00	4,196.00	100.00
	126.00	126.00	100.00

Palm Oli Mill Effluent Treatment

Description	Unit	Value
POME Produced	t/yr	103,016
Diverted to Compost	%	0
Diverted to anaerobic digestion	%	100
POME to anaerobic pond	%	100
POME to methane capture (flaring)	%	0
POME to methane capture (electricity generation)	%	0
COD value before anaerobic digestion	mg/l	60,000
COD value after anaerobic digestion	mg/l	5,000
COD removed during digestion	tCOD/tPOME	0.06
POME Produce	t/yr	103,016
CH4 (Total)	t/yr	11,00.21
Applied N in POME	t/yr	46.36
Total N2O emission from POME	tCO2e/yr	0.31

*POME is only processed in WWTP

Based on the results of the above data analysis, it can be seen that the emission value from the production of CPO and PK is quite high at 7.53 tCO₂e/tProduct. However, when compared to the emission values of the previous period, there was a decrease in CPO and PK emissions from 11.39 tCO₂e/tProduct to 7.53 tCO₂e/tProduct. The results of interviews with management stated that the emission reduction was due to changes in data where previously FFB suppliers had not been included in the data, as well as the wrong peat area. The magnitude of the emission value is due to the fact that the company's entire planted area is on peat land. There is a difference in the HCV area in the GHG calculator with the basic info, because there is a 120 Ha HCV area that has been converted into an oil palm planted area, so the area is identified as an embedded area in the GHG Calculator, while for basic info it still refers to its management as an area. HCV.

7.10.2

The Certification Unit carried out new developments after 2014, so that companies are required to manage GHG by conducting an inventory of emission sources as recommended in the results of the NPP study. They can show identification documents of activities that generate emissions for the period 2021 for Mills and Plantations. This is done to estimate carbon stocks in the management area

along with potential sources of emissions that can occur directly as a result of the management, and a plan to minimize these emissions is drawn up and implemented.

The GHG emission reduction mitigation plan developed by the company is the use of renewable fuels in the form of shells and fiber as a substitute for diesel, performing maintenance on operational equipment on a regular basis, and utilizing POME in Land Applications. Companies can show records of GHG mitigation for Estate and Mill units, for example the use of fertilizers according to the dose, routine maintenance of operational vehicles, socialization of the prohibition of burning waste, implementation of efficient use of electricity and integrated pest control to minimize the use of pesticides.

7.10.3

The certification unit has identified sources of pollution and a mitigation plan contained in the SOP for Greenhouse Gas Inventory Number SOP-OTH-F3-015 dated January 10, 2019 which explains the identification of emission sources from plantation operations and palm oil mills. The company has also carried out management and monitoring related to the results of the identification and mitigation plans as evidenced through the RKL-RPL document for semester 2 of 2021 and has reported it to the Environmental Service of Kotawaringin Barat Regency on March 31, 2022.

Based on the verification of the document, it shows that in the management of air pollution, the certification unit has tested air emissions on boilers and generators as well as ambient air. The test was carried out by a KAN accredited laboratory (LP-001-IDN) on September 16, 2021. Based on the analysis of the value of the test results, it can be concluded that there is no value that is above the applicable quality standard, namely PermenLH Number 07 of 2007 for Boilers, Minister of Environment Regulation Number 13 2009 for Gensets and PPRI Number 22 in 2021 for ambient air.

In addition, the company has also carried out management for interference from immovable sources. The test was carried out by a KAN accredited laboratory (LP-001-IDN) on September 16, 2021. The tests carried out by the company included testing for odor, vibration, and noise in the work area and housing. Based on the results of document verification, it shows that all test results are in accordance with the quality standards set for each applicable statutory regulation, namely KepmenLH No. 48/1996 for noise, KepmenLH number 49/1996 for vibration, and KepmenLH No. 50/1996 for odors.

However, for noise measurement results, based on Permenakertrans Number 5 of 2018 for several FFB processing areas at the Mill, it shows that they are above the required quality standard values. Under these conditions, to reduce the potential for harm to hearing, the company has prepared several control actions plans to reduce the impact on the health factors of operators working in the workplace. Efforts that have been made by the company include:

- Regular maintenance program for tools/machines to keep them awake.
- Setting the working time by means of job rotation so that the amount of noise exposure to workers can be controlled (should not be >8 hours/day for a noise level of 85 dBA).
- Preparation of HIRAASA - 4 (Hazard Identification Risk Assessment & Risk Control) documents for all activities in the factory and socializing it to all related employees
- Conduct periodic socialization and training of SOPs to related operators.
- Installation of "Noise Zone" warning boards and mandatory use of PPE.
- Regular inspection and evaluation of the health of the workforce and the work environment at stations with a potential noise hazard level.
- Examination of the use of PPE by safety officers related to the discipline of using PPE.
- Provide PPE in the form of earplugs and earmuffs and conduct audiometric health checks for factory employees.

The results of interviews with boiler and generator officers stated that there was never any hearing loss experienced by the informants or other factory workers, the company has also carried out routine health checks. The resource person also explained that the obligation to use PPE in the work area is an obligation that must not be violated, warnings about the use of PPE and checking the completeness of PPE are also applied in the company.

	Status: Comply
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7.11
Fire is not used for preparing land and is prevented in the managed area.

7.11.1, 7.11.2 & 7.11.3

During ASA-2 & ASA-3 audits, the company does not conduct any new development and replanting activities. Zero burning policy has been developed and listed on Procedure for Land Clearing and Preparation of document number: MAN - UOM - 001 dated January 1, 2017 states that it must be emphasized in the process of land clearing that burning is not permitted. The company's policy is zero burning and this must be obeyed. Severe sanctions will be imposed on leaders and staff who violate this policy.

The Zero Burning policy applies to all subsidiaries under the Eagle High Plantation group. Based on the results of interviews with representatives of the surrounding village communities, employees, and information from the Environment Agency of Kotawaringin Barat Regency, it was known that there had never been land clearing using fire.

There is no use of fire in land clearing and pest eradication in accordance with the zero burning procedures and policies owned by the company.

The company has prepared fire prevention and control measures as described in the fire management report. The company monitors land fires every day in areas prone to land fires and fire monitoring towers. Based on the results of land fire monitoring from January 2022 to March 2022 in Semeru, Arjuna, and Bromo plantations there were no known land fires in the company's operational area.

The company has involved stakeholders on locations border operational areas as an effort to prevent and control fires through socialization and simulation of land fires on March 12, 2022 involving Sungai Bedaun villages.

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

The company cleared the land in 2005 without prior HCV assessment so that remediation and compensation procedures apply, because the HCV assessment for the PT EHP and PT BLP areas was only carried out in 2012 (final document in 2013). In this regard, the company has conducted a LUCA study compiled by Rodziah Binsi Hashim. The results of the LUCA study are as follows:

- Total area of management unit is 9,128 ha
- Total area of raw liability is 3,865 ha
- The total area of conservation liability is 506 Ha.
- The company has obtained PASS status for the results of the LUCA study on July 25, 2016.

From the visual interpretation and analysis, it can be concluded that the liability analysis for PT Bumi Langgeng Perdanatrada was done according to the guidelines set by RSPO. Nonetheless, the calculation by the reviewer is higher as compared to the Company's calculation in terms of the total size area. Based on this review, the total area of raw liability for the Company is 3,865 ha with conservation liability of 506 ha.

7.12.2

Based on the verification of land clearing data, there is no indication of new land clearing after 15 November 2018, therefore the company has no obligation to conduct a High Carbon Stock (HCS) study. The HCV assessment for PT EHP and PT BLP was conducted in July 2012, with peer review conducted in October 2012 and the final document in January 2013. The HCV assessment was carried out by Tropenbos International, chaired by Kresno Dwi Santosa using the 2008 HCV toolkit. HCV is carried out for the scope of PT EHP and BLP which consists of 1 POM and 3 Estates with a total study area of 8,750 Ha according to the Location Permit. In the HCV document it is stated that the scope of the study is a HGU covering an area of 7,500 hectares but when a map verification is carried out, the scope of the study refers to the Location Permit, this was also confirmed by the company's GIS team which showed the scope area used in the HCV assessment was not based on HGU but rather a Location Permit. Based on the results of the HCV study, the HCV area was 355.15 Ha and the peat conservation area was 4,474.78 Ha. The following is data on the area of HV based on the results of the study, including:

No	Location	Area (Ha)	HCV Type
1	Peat Land Area (Conservation non-HCV)	4.474,78	4.1
2	Albi Springs	15,62	4.1
3	Cub Springs	14,42	4.1

4	Musabeu Springs	14,38	4.1
5	Rogia Springs	15,6	4.1
6	Tanjung Lingga Springs	15,94	4.1
7	Spring at Block F38	23,75	4.1
8	RTBM Springs	13,66	4.1
9	Tanjung Pengrain Springs	13,93	4.1
10	Roko river reservoir	2,99	4.1
11	Reservoir G38 A	1,03	4.1
12	Reservoir G38 B	0,31	4.1
13	Watering Reservoir A Block I33	1,37	4.1
14	Watering Reservoir B Block I33	1,23	4.1
15	Tanjung Pandan Reservoir	1,28	4.1
16	Reservoir F 36 A	1,63	4.1
17	Reservoir F 36 B	1,3	4.1
18	Bedaun River Border	7,22	4.1
19	Bakung River Border	21,11	4.1
20	Seluang River Border	41,81	4.1
21	Forest Area Block G38	4,23	1.1.,1.2.,1.3.,1.4.,2.3
22	Forest Area Block J49	17,91	1.1.,1.3.,1.4.,2.3
23	Forest Area Block D29	124,43	1.1.,1.3.,2.3
24	Offerings area	0,0025	6
25	Pillar of Ulin (Sacred)	0,0025	6
TOTAL Conservation Area		4.829,94	
HCV Only		355,15	

Regarding the peat area of 4,474.78 hectares which is a conservation area, currently the condition is already planted with oil palm, the management carried out is through water management to maintain the quality of the peat. For the Forested Area in block D29 covering an area of 124.43 Ha, the current condition is that it has become an oil palm plantation, and is no longer forested. However, this area is no longer managed as a plantation area, but is managed as an HCV area by allowing it to be forested again. The area is an area that has not been compensated so that its current status cannot be fully owned by the company even though it is in the company's HGU. For the 355.15 Ha HCV area, 208.58 Ha of them are in the form of Oil Palm Plantation areas which have been identified as HCV areas but there are still plantation management activities in the form of harvesting and manual maintenance. Thus, in the Basic Info data, only 146.57 Ha were identified as HCV areas, with the actual conditions at the time of the audit being in the form of forested areas or abandoned oil palm plantations. The area of 207.58 Ha will be removed from the production area during replanting activities and the area will be left as a forest area.

Based on the results of field observations, there are several HCV areas that have changed from the initial conditions that were designated as HCV areas, for example, forested areas bordering springs that have now become food bank, river borders that have changed contours due to ditch-making activities, and forested areas bordering eyes. water that has become a planted area for oil palm. This happened before the company did the certification or around 2014-2015. Based on this, the company explains its commitment to maintain the HCV area which has been fully explained in indicator 7.12.4.

7.12.3

Indicator 7.12.3. currently irrelevant to Indonesia, until further decisions from the RSPO.

7.12.4

Based on the results of HCV identification, it is known that there are HCV areas within the scope of the certification unit and several types of RTE species consisting of mammals, aves and herpetofauna. The company has compiled and determined the HCV management plan in the 2019-2028 HCV Management Plan document with the scope of management and targets every year. An integrated management plan is developed in consultation with relevant stakeholders and covers areas that are directly managed and takes into account the relevant wider landscape level carried out in conjunction with the annual SIA review. The company manages the HCV area by providing boundary markers, signboards and markers for the boundaries of the HCV area. In addition to the 10-year management plan, the company also has a management plan that is prepared annually which aims to update management and

monitoring needs, the annual program for the 2022 period includes:

- Socialization of HCV Area Management and Management of Critically Endangered, Threatened, and/or Protected Species
- Maintenance of HCV attributes by creating, installing and maintaining boundary signs, boundary markers and carrying out monitoring and maintenance of information boards.
- Monitoring of HCVs by conducting surveys for flora and fauna inventory.

The implementation of HCV management and monitoring for 2021 is carried out in accordance with the 2021 HCV Management Plan where the timing and intensity of the implementation are also appropriate, which can be shown based on the official report, including:

- Socialization of the HCV area to the Bedaun Village Community on January 20, 2022, which was attended by 22 people.
- Socialization of the HCV area to Semeru Estate employees on January 17, 2022, which was attended by 99 people.
- Socialization of the HCV area to Arjuna Estate employees on January 14, 2022, which was attended by 48 people.
- Socialization of the HCV area to Bromo Estate employees on January 20, 2022, which was attended by 85 people.
- HCV Patrol Report for 2021 period, for example the patrol carried out on 14 December 2021 at Bromo Estate to ensure flora and fauna conditions in the HCV area.
- Monitoring of HCV attributes every 3 months Update December 2021.
- PT EHP AND PT BLP flora and fauna monitoring report conducted every 6 months, Update in December 2021.

The company also has a map of the HCV area and topography with a scale of 1:75,000, the map is also equipped with information about: map title, cardinal directions, map legend, map update date, and map source. The company also conducts a review related to management and monitoring activities in 2021 as evidenced in the 2021 HCV Management Plan Review Report which contains evaluation and management and monitoring recommendations as an effort to improve HCV management activities in 2022.

Based on the results of field observations in several HCV areas, information was obtained that there are HCV areas that have already planted oil palm, have not been compensated, areas have potential for replanting and areas that have become food plantations. The company can show the Sustainability Policy (2018) document, Statement Letter Number 023/EXT/BP-EHP/VI/2022, as well as SOP for Management and Monitoring of Conservation Areas Number SOP-OTH-F3-012 which generally states that all conservation areas will be maintained and maintained. Based on this, companies are encouraged to ensure that the existence of HCV areas is maintained and/or enhanced through the realization of more specific programs. **(OFI)**.

7.12.5

The company has identified the needs of the community as well as the areas needed by the affected community to meet their basic needs, taking into account the potential positive and negative changes in their livelihoods as a result of the company's operational activities. This can be proven by the existence of an HCV 6 area in the form of the sacred Batang Ulin and the area for offering traditional ceremonies. The company has identified and carried out activities to minimize risks and impacts both for the community and for the environment, for example by providing regular socialization to the community not to apply chemicals in river areas to avoid pollution, not to clear land by burning, and so on. .

The unit of certification has also considered various land tenure and management options to protect the HCV area in a way that also protects the rights and livelihoods of local communities. For example, for the HCV Block D29 area of 124.43 Ha where the area is a forested area belonging to the Bedaun Village community. Due to an agreement to establish a plasma plantation in the area with the Kumai Hulu Seberang Cooperative which consists of the Bedaun Village Community, an agreement emerged to open the area into an oil palm plantation. After the area was planted, an internal conflict arose within the cooperative which caused the company to refuse compensation for the area. So that until now the company has left the area, and it is still left as an HCV area whose condition has begun to be forested. The company stated that it is committed to continuing to make the area a HCV area, by making an agreement by the land owner that it will exchange land for new land. However, until now no new land has been acquired to replace the area, so the company only provides compensation to the land owner so that the location is not cleared or managed by the community and is left as an HCV area.

Currently, the company also has an agreement with the community who are members of the Fire Alert Community, for example for monitoring and patrol activities, the company has also made an agreement with the community who are active in the company's area not to hunt and trade wildlife. The company has also approached relevant stakeholders, including:

- Submit a list of protected species found in the BKSDA area.
- Provide executive summary to relevant parties such as local government and local communities.
- Socialization regarding HCV is carried out periodically to find out the extent of community understanding of the existence of HCVs

in the PT EHP and PT BLP areas.

- Make an agreement with the surrounding village to maintain the HCV area in the plantation area.
- Provide assistance in evacuating the entry of Orangutans into community land.

7.12.6

The Certification Unit already has a policy set out in procedures related to the protection of endangered species, namely Procedure Number OP-OTH-F3-12 regarding Management and Monitoring of Conservation Areas dated January 10, 2019 as well as the Sustainability Policy document owned by PT EHP Group. The document contains procedures consisting of preventive and repressive measures in an effort to protect protected wildlife and plants such as sustainability principles, all employees are advised not to hunt, capture, kill and sell protected animals and plants that are endangered and report any such activities. Maintain and not disturb the area designated as HCV area and report any illegal acts. Employees who do not comply will be subject to sanctions in accordance with the applicable laws and regulations. The company also put up no hunting boards with photos of the species and sanctions for violating government regulations in all HCV areas.

Information related to the application of sanctions for employees in the form of disciplinary action in accordance with the provisions of national law is also listed on the HCV signboard. The sanction is imposed by the company by giving the first warning letter to employees who violate work rules. Based on the results of interviews with company employees regarding animal protection, the company has committed to protecting animals that are within the scope of the company's management area, such as implementing a ban on hunting, killing and keeping wild animals within the company's environment. The procedure for animal protection also regulates the existence of sanctions or fines for those who violate these provisions.

In addition, the company has also conducted socialization about the existence of endangered plants and animals to employees and the surrounding community as indicated in the official report of the socialization as evidenced by the official report, accompanied by a photo and attendance list as described in indicator 7.12.4. Indirect socialization is also carried out by installing information boards and brochures warning signs related to conservation areas and the presence of protected rare plants and animals in places that are easily visible, such as area entrances, regional roads that are often crossed by the community, and other places other strategic areas such as offices, and other public facilities. The results of field observations in several conservation areas indicate that the company has managed protected areas such as replanting local plant species, not logging, using no chemicals, and installing HCV signboards as well as prohibiting hunting and burning to avoid and prevent poaching and/or encroachment. HCV area. Routine monitoring of HCV areas is carried out by several personnel appointed by the company.

Based on interviews with management units and company employees regarding animal protection, the company has committed to protecting animals that are within the scope of corporate governance, such as implementing a ban on hunting, killing and keeping wild animals within the company's environment. Field observations also commonly found protected species that live freely in the company area, such as the River Kingfisher (*Todirhamphus chloris*), Oriental Darter (*Anhinga melanogaster*) and Water Monitor (*Varanus salfator*). The results of interviews with workers and the community also often found Sun Bears (*Helarctos malayanus*) and Orangutans (*Pongo pygmaeus*). Observations in employee housing areas also show that no one keeps protected animals, the common pets owned by employees are chickens, cats and dogs that have been domesticated.

7.12.7

Monitoring of protected areas in the period of 2021 is carried out regularly every month to ensure the security of the area. Monitoring activities are carried out in several river border locations and all areas of the company's management. This monitoring is carried out to see the progress of the results of HCV management from the initial stage to the current condition. The company also monitors the diversity of flora and fauna which is routinely carried out every year by showing the results of HCV monitoring carried out in 2021. The results of observations of fauna in the plantation area still found several types of protected animals that are included in the protection status according to the IUCN, CITES and PermenLHK Number 106 of 2018 includes the Root Tiger (*Prionailurus bengalensis*) and several types of Eagles, Parrot (*Psittacula longicauda*), Striped Kipasan Bird (*Rhipidura javanica*) and Wild Boar (*Sus barbatus*). The results of interviews with workers and the community also often found Sun Bears (*Helarctos malayanus*) and Orangutans (*Pongo pygmaeus*).

The company also conducts annual monitoring and evaluation for the management of HCV areas where this activity aims to identify risks and impacts on conservation areas and improve protection efforts. The company also follows up on the improvement of the HCV area management plan which is made annually by involving all relevant stakeholders in the company's operational areas such as the

surrounding community, especially the surrounding community and law enforcement. The company also conducts a review related to management and monitoring activities in 2021 as evidenced in the 2021 HCV Management Plan Review Report which contains evaluation and management and monitoring recommendations as an effort to improve HCV management activities in 2022. Based on the results of the review, several management recommendations were obtained, including:

- Increase socialization activities to staff, plantation employees and the community around the plantation to increase the level of understanding of HCVs, especially for employees and staff in the factory environment.
- Carry out various action plans for corrective actions based on management and monitoring recommendations that have been carried out.
- Improved the writing on the faded HCV 6 (Grave) markers and put-up signboards for animal monitoring paths in areas that have been designated as monitoring paths in each Estate.
- Improve the Management Plan document form in accordance with the SOP for Management and Monitoring of HCVs.

All evaluation results will be reviewed and will be adjusted to the HCV management program in 2022. The evaluation results also indicate an increase in species encounters. In addition, management and monitoring of HCVs has been carried out in a participatory manner by involving communities around the plantations, one of which is an agreement with the community to jointly protect the HCV area. If we refer to the 2021 HCV Management Program, 2021 HCV Management Report, 2021 HCV Management Review and actual conditions in the field, it can be concluded that the company has carried out the management as stated in the document.

7.12.8

The company cleared land after 2005 without prior HCV assessment so that remediation and compensation procedures apply. The company conducted an HCV assessment for the PT EHP and PT BLP areas in 2012 (final document 2013). In this regard, the company has conducted a LUCA study and carried out the RaCP management process, as follows:

- The company presented the Land Use Change Analysis of PT BLP dated July 25, 2016 which informed that the total area of the unit, total area of raw liability, and total area of conservation of liability were about 9,128 ha; 3,865 ha; and 506 ha, respectively. The analysis resulting PASS from RSPO.
- Based on the RSPO Remediation and Compensation procedure in November 2015, it was informed that there is information on the company's obligations for land clearing from 1 January 2005 to 9 May 2009 and from 1 January 2010 to 9 May 2014 covering an area of approximately 182 ha and 308 ha, respectively. The first calculation is $(260 \text{ ha} \times 0.5) \times 0.7 = 182 \text{ ha}$; while the latter is $(220 \text{ ha} \times 2) \times 0.7 = 308 \text{ ha}$.
- The concept note for remediation and compensation was sent via email to RSPO Compensation on 07 February 2019, to which khing.suli@rspo.org responded, and the Compensation note is acceptable but needs further explanation in the remediation section. The company has provided a response regarding the remediation (revision) issue via email on 13 February 2019, but there has been no response from the RSPO. Accordingly, the company sent an email to emir@rspo.org on February 26, 2019, requesting an update of the concept note, and this email has responded that the review process is still ongoing.
- There was an email from the RSPO dated 22 January 2019 which stated that if the company cannot meet the RaCP requirements, then the RSPO certificate cannot be issued until the RaCP is approved by the RSPO. Companies are given one year to complete and comply with the RaCP Process, otherwise the company is required to make a public announcement and re-audit if it fails to be approved by the RSPO.
- There was an email from the RSPO dated 25 April 2019, which stated that the corrective information provided in the revised Concept Note had been approved. The complete concept note (pre-approved proposed conservation project) has been approved by the Compensation Panel. The Company prepares and submits a Compensation Plan. As discussed, and referenced in the RaCP procedure, there will be a flat fee of USD 1,800.
- There was an email from the RSPO dated 10 May 2019 regarding the Endorsement of the Panel. Summary Compensation table of RaCP. The RaCP program has been running since January 2020 and by the time the ASA-3 audit was conducted, the Remediation and Compensation activity stage had entered the 2nd year of the program.
- Until the ASA-3 audit was conducted, there was no scheme to conduct field visits to the Remediation project located in Rimba Raya. Provide a plan especially for the audit team for further supervision if field visits in the project area.
- The company can show the annual report of the RaCP project through the Monitoring Report (Annual Progress Update) document of Rimba Raya Biodiversity Reserve, Rehabilitation Project, March 2022 compiled by Lestari Capital. The document describes the program objectives, among others:
 - Refining the area into a beautiful border landscape which is a valuable asset and environmental asset.
 - Provide a habitat for shelter and a source of food for various types of animals such as aquatic animals and other wildlife.
 - Protects the landscape from erosion.

- Effectively filter runoff into rivers from pollutants such as fertilizers, anti-pesticides (pesticides) and heavy metals so that river water quality is maintained from pollution.
- To achieve the above, and to continue what we have been doing from 2020, the company carries out several programs including:
 - maintain the practice of cleaning under the canopy, immediately stop the use of fertilizers and pesticides in riverbanks to facilitate natural regeneration.
 - Maintain the nursery area and seeds
 - Replanting in the river border area of 670 trees (*Gmelina arborea*, *Senna siamea*, *Peronema canescens* Jack, and *Jaring Hantu* (local name) along the Seluang and Bakung River borders.
 - Monitor seeds, trees and riverbanks
 - Installation of signage as a form of indirect socialization and FGD for direct socialization.

Based on this evidence, and analysis of several documents including email communications between PT EHP and PT BLP and RSPO, it can be concluded that the company has fulfilled its obligations under the RaCP program.

	Status: Comply	
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3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or√
ASA-2 & ASA-3	EHP POM of PT EHP do not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	√
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or√
ASA-2 & ASA-3	EHP POM of PT EHP do not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	√
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or√
ASA-2 & ASA-3	EHP POM of PT EHP do not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	√
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or√
ASA-2 & ASA-3	EHP POM of PT EHP do not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	√
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

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

PT Eagle High Plantation Tbk Time Bound Plan (TBP) is explained in table 1.5. PT Eagle High Plantation Tbk run nine (9) mills and seventy two (72) estates in Indonesia. PT Eagle High Plantation Tbk has informed the TBP, MUTU has considered that PT Eagle High Plantation Tbk is comply with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by PT Eagle High Plantation Tbk on June 2022 by the sustainability departement..

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

MUTU Auditor has verified company partial certification and concludes that:

- There is no significant land conflicts which have not been declared below.
- The company has follow RSPO requirement related to Remediation and Compensation Procedure, but not for New Planting Procedure. The company will follow the sanction from RSPO for area that has open after 1 January 2010 without NPP.
- There is no labour disputes that are not being resolved through an agreed process.
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company Group/Holding Statement: PT Eagle High Plantations, Tbk. had conducting internal audit towards partial certification for its subsidiary companies.</p> <p>Auditor Verification: The has shown Internal Audit report for all uncertified management unit as follows:</p> <ol style="list-style-type: none"> 1. PT Bumilanggeng Perdanatrada (PT BLP) 2. PT Eagle High Plantation (PT EHP) 3. PT Bumi Hutani Lestari (PT BHL) 4. PT Adiyaksa Dharma Satya (PT ADS) 5. PT Jaya Mandiri Sukses (PT JMS – East Kalimantan) 6. PT Manunggal Adi Jaya (PT MAJ – East Kalimantan) 7. PT Suryabumi Tunggal Perkasa (PT STP – East Kalimantan) 8. PT Sawit Sukses Sejahtera (PT SSS) 9. PT Prima Cipta Selaras (PT PCS) 10. PT Arrtu Plantation (PT APN) 11. PT Arrtu Energie Resources (PT AER) 12. PT Arrtu Borneo Perkebunan (PT ABP) 13. PT Arrtu Agro Nusantara (PT AAN) 14. PT Mandiri Kapital Jaya (PT MKJ) 15. PT Multikarya Sawit Prima (PT MSP) 16. PT Seguri Serasau Sejahtera (PT SGSS) 17. PT Satria Manunggal Sejahtera (PT SMS) 18. PT Bumi Sawit Utama (PT BSU) 19. PT Agrolestari Kencana Makmur (PT AKM) 20. PT Varia Mitra Andalan (PT VMA) 21. PT Wanacatur Jaya Utama (PT WCJU)

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		22. PT Tandan Sawita Papua (PT TSP) 23. PT Manunggal Adi Jaya (PT MAJ – South Kalimantan) 24. PT Karyapratama Agrisejahtera (PT KAPAG) 25. PT Saka Kencana Sejahtera (PT SKS) 26. PT Pesonalintas Surasejati 27. PT Singalan Asetama (PT SGA) 28. PT Suryabumi Tunggal Perkasa (PT STP – South Kalimantan) 29. PT Jaya Mandiri Sukses (PT JMS – South Kalimantan) The audit done by 3 internal auditor on November 2018.
2.1.2	No replacement after dates defined in NIs Criterion 7.3 of: <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	Company Group/Holding Statement: PT Eagle High Plantations, Tbk is not reporting disclosure of liability but has already deliver LUCA to RSPO through email. Auditor Verification: <ul style="list-style-type: none"> - PT BLP – EHP Mill <ul style="list-style-type: none"> • HCV assessment has conducted by Tropenbos International Indonesia on September 2012. • LUCA has conducted by Aksenta on February 2015. The LUCA had been reviewed by RSPO on 25 July 2016 and passed the review, as informed through an email dated 9 September 2016. The RaCP Concept Note analysis has stated passed by RSPO Compensation, informed through email dated 09 September 2016. • 31 Oct 2018: Submission of the LUCA for PT BLP 562 ha and updated LUCA for PT AAN • 7 Oct 2019: 1st Review (sent to Aksenta for response on 8 Oct 2019) • 20 Nov 2019: clarification submitted - PT EHP – EHP Mill. <ul style="list-style-type: none"> • 23 Nov 2018: Concept Note was submitted to RSPO • 7 Jan 2019: disclosure of liability • 7 Feb 2019: Preliminary feedback was received from the RSPO • 13 Feb 2019: Updated concept note was submitted to RSPO • 19 Feb 2019: More information was being asked by RSPO • 20 Feb 2019: More information was supplied to RSPO • 18 Mar 2019: more clarification was being asked • 18 Mar 2019: clarifications responded • 25 Mar 2019: environmental remediation issue resolved, the concept note is now forwarded to the Compensation Panel to finalize the review and approval of the concept note • 9 Apr 2019: more information required • 10 Apr 2019: information supplied • 25 Apr 2019: Concept Note approved, Compensation Plan submitted to RSPO. - PT BHL – BHL Mill. <ul style="list-style-type: none"> • HCV assessment has conducted by Tropenbos International Indonesia on July 12th 2012. • LUCA has conducted by Aksenta on July 2017. The LUCA had delivered to RSPO Compensation through email on Oct. 15th 2018

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>and has been reviewed from RSPO Reviewer on March 24th 2018 but still need clarification.</p> <ul style="list-style-type: none"> • LUCA for location permit of PT BLP was completed in May 2016 by Aksenta. Submitted to RSPO on 31 Oct 2018 <p>- PT ADS – ADS Mill.</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Tropenbos International Indonesia on July 12th 2012. • LUCA has conducted by Aksenta on July 2017. The LUCA has been submitted to RSPO Compensation through email on 29 Sep 2017 and has been reviewed by RSPO Reviewer on 20 Mar 2018. On 26 Sep 2018, further clarifications were required and on 15 Oct 2018, an update of the LUCA was submitted in response to the clarifications <p>- PT JMS – Bangkirai Mill.</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Sonokeling Akreditasi Nusantara on November 2011. • LUCA had conducted by Aksenta on December 2016. The LUCA had been reviewed by RSPO on April 6th 2018 and on March 14th 2018. The RaCP analysis has stated passed for 27.10 ha by RSPO Compensation, informed through email dated September 18th 2018. However, for 113.35 ha was still on going process by RSPO. <p>- PT MAJ – Bangkirai Mill.</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Sonokeling Akreditasi Nusantara on December 2011. • 7 Jan 2019: disclosure of liability • 30 Apr 2019: LUCA submitted • 12 Nov 2019: Clarification required (sent to Daemeter on 13 Nov 2019) - RSPO sent the MAJ Kalsel file • 29 Jan 2020: Clarification required (sent to Daemeter on 29 Jan 2020) <p>- PT STP – Bangkirai Mill.</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Sonokeling on December 2011. • LUCA has conducted by Aksenta on July 2017. The LUCA has been submitted to RSPO Compensation through email on 29 Sep 2017 and has been reviewed by RSPO Reviewer on 11 Mar 2018. On 26 Sep 2018, further clarifications were required and on 19 Oct 2018, an update of the LUCA was submitted in response to the clarifications. • 15 Oct 2019: 2nd clarification required (sent to Aksenta for response on 16 Oct 2019) • 9 Dec 2019: clarification submitted • 29 Jan 2020: Pass <p>- PT SSS – SSS Mill.</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Tropenbos International Indonesia on November 2011. • 7 Jan 2019: disclosure of liability • 30 Apr 2019: LUCA submitted

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> • 4 Nov 2019: request for clarification (sent to Daemeter for response on 4 Nov 2019) <p>- PT PCS – SSS Mill.</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Tropenbos International Indonesia on December 2012. • 7 Jan 2019: disclosure of liability • 30 Apr 2019: LUCA submitted • 4 Nov 2019: request for clarification (sent to Daemeter for response on 4 Nov 2019) <p>- PT APN – Kelampai Mill</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Sonokeling on July 2012. • LUCA has conducted by Aksenta on July 2017. The LUCA has been submitted to RSPO Compensation through email on 29 Sep 2017. On 26 Sep 2018, further clarifications were required and on 11 Dec 2018, an update of the LUCA was submitted in response to the clarifications. <p>- PT AER – Kelampai Mill</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Sonokeling on July 2012. • LUCA has conducted by Aksenta on April 2018. The LUCA has delivered through email dated October 15th 2018 and still under review by RSPO Compensation. <p>- PT ABP – Kelampai Mill</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Sonokeling on July 2012. • LUCA has conducted by Aksenta on July 2017. The LUCA has been submitted to RSPO Compensation through email on 29 Sep 2017. On 26 Sep 2018, further clarifications were required and on 19 Oct 2018, an update of the LUCA was submitted in response to the clarifications. <p>- PT AAN – Kelampai Mill</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Sonokeling on July 2012. • LUCA has conducted by Aksenta on July 2017. The LUCA has been submitted to RSPO Compensation through email on 29 Sep 2017. On 26 Sep 2018, further clarifications were required and on 31 Oct 2018, an update of the LUCA was submitted in response to the clarifications. <p>- PT MKJ – Kelampai Mill</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Sonokeling on July 2012. • 7 Jan 2019: disclosure of liability • 8 May 2019: LUCA submitted • 24 Sep 2019: clarifications required (sent to Daemeter on 14 Oct 2019) <p>- PT JMS – Batu Bulan Mill</p> <ul style="list-style-type: none"> • 7 Jan 2019: disclosure of liability

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> • 29 Sep 2017: LUCA submitted • 26 Sep 2018: Further clarification required • 15 Oct 2018: Revision of the LUCA submitted, FCL is now 101.73 ha • 25 Nov 2019: Further clarification required (sent to Aksenta on 26 Nov 2019) • 20 Jan 2020: Revision of the LUCA submitted • 3 Mar 2020: Clarification required • 4 Mar 2020: Revision submitted • 12 Mar 2020: pass <p>- PT STP – Batu Bulan Mill</p> <ul style="list-style-type: none"> • HCV assessment and LUCA still on progress. • 7 Jan 2019: disclosure of liability • 30 Apr 2019: LUCA submitted <p>- PT SGA – Batu Bulan Mill</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Yayasan Sawit Berkelanjutan on June 2010. • 7 Jan 2019: disclosure of liability • 30 Apr 2019: LUCA submitted <p>- PT PLS – Safir Mill</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Sonokeling on June 2015. • LUCA has been conducted by Aksenta in July 2017. The LUCA has been submitted to RSPO Compensation through email on 29 Sep 2017. On 27 Sep 2018, RSPO sent a list of clarifications and LUCA's status without the status of PT PLS' LUCA. On 5 Oct 2018, the LUCA was resubmitted to RSPO. <p>- PT SKS – Safir Mill</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Sonokeling on July 2012. • 7 Jan 2019: disclosure of liability • 30 Apr 2019: LUCA submitted <p>- PT KAPAG – Safir Mill</p> <ul style="list-style-type: none"> • HCV assessment and LUCA still on progress. • 7 Jan 2019: disclosure of liability <p>- PT MAJ – Safir Mill</p> <ul style="list-style-type: none"> • HCV assessment and LUCA still on progress. • 7 Jan 2019: disclosure of liability <p>- PT TSP – Tulip Mill</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Polito on September 2010. • LUCA has conducted by Aksenta on July 2017. The LUCA has been submitted to RSPO Compensation through email on 15 Oct 2018. • 4 Nov 2019: request for clarification, sent to Aksenta on 4 Nov 2019 • 16 Dec 2019: clarification submitted • 12 Jan 2020: clarification requested (sent to Aksenta on 16 Jan 2020)

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>- PT VMA</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Sonokeling on September 2012. • LUCA was completed in Dec 2015 by Aksenta. Submitted to RSPO on 29 Sep 2017. The LUCA has been submitted to RSPO Compensation through email on 29 Sep 2017. On 27 Sep 2018, RSPO sent a list of clarifications and LUCA's status without the status of PT VMA LUCA. On 5 Oct 2018, the LUCA was resubmitted to RSPO. On 11 Nov 2018, RSPO required more data on PT VMA LUCA and on 11 Dec 2018, the revised LUCA for PT VMA was submitted to RSPO Compensation • 24 Sep 2019: clarifications required • 21 Oct 2019: clarifications submitted • 4 Nov 2019: clarifications required, sent to Aksenta on 4 Nov 2019 • 17 Dec 2019: clarification submitted <p>Based on desk study found complaint from NGO (green peace) related to deforestation in PT Varia Mitra Andalan and Arrtu Energie Resources. Company has conduct clarification for VMA by conduct HCS and for AER company has made fire incident report and sent to GAR as buyer on 19 November 2018.</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: All subsidiaries of EHP not conduct NPP for new planting since 1 January 2010, detail information consist of:</p> <ol style="list-style-type: none"> 1. PT MSP: planting year consist of 2009 – 2016 and not conduct NPP. 2. PT SGSS: planting year consist of 2008 – 2014 and not conduct NPP. 3. PT SMS: planting year consist of 2011 – 2014 and not conduct NPP. 4. PT SMS: planting year consist of 2013 – 2015 and not conduct NPP. 5. PT AKM: planting year consist of 2011 – 2015 and not conduct NPP. 6. PT VMA: planting year consist of 2015 and not conduct NPP. 7. PT WCJU: planting year consist of 2007 – 2014 and not conduct NPP. <p>Auditor Verification: Based on auditor verification 24 subsidiaries of EHP not conduct NPP and will be object as sanction, those unit consist of:</p> <ol style="list-style-type: none"> 1. Palms in PT BLP were planted in 1997 to 2014. 2. Palms in PT BHL were planted in 1998 to 2014. 3. Palms in PT ADS were planted in 2006 to 2014. 4. Palms in PT JMS (Bangkirai Mill) were planted in 2005 to 2015. 5. Palms in PT MAJ (Bangkirai Mill) were planted in 2006 to 2015. 6. Palms in PT STP (Bangkirai Mill) were planted in 2007 to 2014. 7. Palms in PT SSS (Bangkirai Mill) were planted in 2008 to 2014. 8. Palms in PT PCS (Bangkirai Mill) were planted in 2011 to 2014. 9. Palms in PT APN (Kelampai Mill) were planted in 2009 to 2017. 10. Palms in PT AER (Kelampai Mill) were planted in 2013 tp 2016. 11. Palms in PT ABP (Kelampai Mill) were planted in 2011 to 2016. 12. Palms in PT AAN (Kelampai Mill) were planted in 2011 to 2017. 13. Palms in PT MKJ (Kelampai Mill) were planted in 2008 to 2015. 14. Palms in PT MSP were planted in 2009 to 2016. 15. Palms in PT SGSS were planted in 2015 to 2016. 16. Palms in PT SMS were planted in 2011 to 2014.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>17. Palms in PT BSU were planted in 2013 to 2015. 18. Palms in PT AKM were planted in 2011 to 2015. 19. Palms in PT VMA were planted in 2015. 20. Palms in PT WCJU were planted in 2007 to 2014. 21. Palms in PT TSP were planted in 2011 to 2014. 22. Palms in PT PLS were planted in 2005 to 2014. 23. Palms in PT SGA were planted in 1997 to 2013. 24. Palms in PT JMS (South Kalimantan) were planted in 2005 to 2016.</p> <p>There are 5 subsidiaries of EHP that not conduct land clearing after 1 January 2010, i.e.:</p> <ol style="list-style-type: none"> 1. PT EHP is a palm oil processing mill without estates → not applicable. 2. Palms in PT MAJ (South Kalimantan) were planted in 2006 to 2008 3. Palms in PT KAPAG were planted in 1997 to 2007 4. Palms in PT SKS were planted in 2006 to 2008 5. Palms in PT STP (South Kalimantan) were planted in 2005 to 2008
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>Company Group/Holding Statement:</p> <ol style="list-style-type: none"> 1. PT MSP: There are no land conflicts 2. PT SGSS: There are no land conflicts 3. PT SMS: There are no land conflicts 4. PT BSU: There are no land conflicts 5. PT AKM: There are no land conflicts 6. PT VMA: There are no land conflicts 7. PT WCJU: There are no land conflicts <p>Auditor Verification:</p> <ol style="list-style-type: none"> 1. SIA for PT BLP has conducted by Sonokeling on 2013 and has also included on AMDAL report dated July 22nd 1998. Both report informed that there were no land conflict which negatively disturbed company operational activities. However, http://tanahkita.id/v2/data/konflik/detil/Wldkbw informed that there was land dispute with Kumai Hulu Village for about 337.00 ha. Regarding this matter, the company shows documents related to process of negotiation and mediation with BPN dated November 19th 2013. Last update was Letter from company dated October 17th 2018 as response towards claimnant letter dated March 11th 2018, which mentioned that it was clear that those dispute area legally owned by PT BLP as stated on BPN Letter dated November 19th 2013. However, it was recommended to claimnant to continue the process into Court. Company letter was also attached to Bupati Kotawaringin Barat, kapolres Kotawaringin Barat, Camat Kumai dan Kepala Desa Bedaun. There is no current respon from claimnant. 2. Land conflict in PT EHP has no exist. 3. SIA for PT BHL Mill has conducted by Sonokeling on September 2013 and also included on AMDAL report dated August 26th 2009. Both report informed that there were no land conflict which negatively disturbed company operational activities. However, it was informed on internal audit that there was land dispute for about ± 60 ha in Kerinci Estate. Unit management shows several related documents, such as Official Letter or dispute mapping field measurement which involving affected parties including Kepala Desa Mirah Kalanaman and Kepala Urusan Pemerintah

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Desa Mirah Kalanaman on November 20th 2008; as well as results of Pengadilan Negeri Kasongan in Katingan and Pengadilan Tinggi Palangkaraya. Todate, update on this matter was ongoing process of checking in Mahkamah Agung with case register No. 1634K/Pdt/2017.</p> <p>4. SIA in PT ADS has conducted by Sonokeling on September 2013 and also included on AMDAL report dated August 26th 2009. Both report informed that there were no land conflict which negatively disturbed company operational activities.</p> <p>However, https://kalteng.antaranews.com/berita/242411/perusahaan-sawit-ads-garap-lahan-pertanian-warga informed that there was land dispute 116 ha with Village of Tanjung Jorong (15 person). Regarding this matter, the company shows minutes of mediation with affected parties in Police Resort of Kotim on December 22nd 2015 for dispute area about 600.00 ha, resulting the claimnant to continue the process into Court. However, there is no progress from claimnant since December 25th 2015.</p> <p>5. SIA in PT JMS (Bangkirai Mill) has conducted by Sonokeling on October 2011 and also included on AMDAL dated June 18th 2007. Both report informed that there were no land conflict which negatively disturbed company operational activities. However, there were about 4,033.20 ha situated within HGU were still occupied by local people. Regarding this matter, unit management shows reconsiliation process among two parties which informed that the locals has not willing for any compensation. These reconsiliation has lastly conducted on 2015 and no positive progress after that.</p> <p>6. SIA in PT MAJ (Bangkirai Mill) has conducted by Sonokeling on December 2011 and also included on AMDAL report dated June 18th 2007. Both report informed that there were no land conflict which negatively disturbed company operational activities.</p> <p>7. SIA in PT STP (Bangkirai Mill) has conducted by Sonokeling in December 2011 and also included in AMDAL report dated February 11th 2008. Both report informed that there were no land conflict which negatively disturbed company operational activities. However, it was informed on internal audit that there was land dispute for about ± 7,52 ha in Cendana Estate, noted in November 3rd 2017. Unit management shows several related documents, such as Police Resort Report from PT STP dated November 3rd 2017 and Information Progress Report Letter dated September 21st 2018 which informed that the case was still under investigation.</p> <p>8. SIA in PT SSS (SSS Mill) was still ongoing progress by Daemeter. Information towards social assessment has also conducted in AMDAL report which consist of two Stage, e.g.: on July 23rd 2008 and June 17th 2010, respectively. Both report informed that there were no land conflict which negatively disturbed company operational activities.</p> <p>9. SIA in PT PCS (SSS Mill) was still ongoing progress by Daemeter. Information towards social assessment has also conducted in AMDAL report dated March 4th 2015. Both report informed that there were no land conflict which negatively disturbed company operational activities.</p> <p>However, http://www.suarakutim.com/safni-kami-sebatas-mengklaim-makam-leluhur-kami-dirusak/ informed that there was an issues related to Ancestor Cemetery in Muara Ancalong. The company has conducting follow up on this matter, shows on Field Checking Official Letter report dated February 26th 2016, resulting there was no marks existing of</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>cemetery (no bones). Official letter signed by stakeholder from Kelinjau Village, Muara Ancalong.</p> <p>10. SIA in PT APN (Kelampai Mill) has conducted by Sonokeling on July 2012 and also included in AMDAL report dated December 5th 2007. Both report informed that there were no land conflict which negatively disturbed company operational activities. However, https://www.pontianakpost.co.id/sengketa-lahan-pt-arrtu-dan-pt-isl informed that there was land dispute for about 2,900 ha with PT Inti Sawit Lestari (PT ISL) in Village of Siantau Raya, Sub-Regency Nanga Tayap. Regarding this matter the company shows Letter from National Land Agency dated August 23rd 2017 which mentioned in Point No. 2 that there were no overlapping area of PT APN with any companies.</p> <p>11. SIA in PT AER (Kelampai Mill) has conducted by Sonokeling on July 2012 and also included in AMDAL report dated December 27th 2010. Both report informed that there were no land conflict which negatively disturbed company operational activities. However, according to web information, it was known as follows: http://www.mongabay.co.id/2014/11/11/orangutan-ini-terjebak-di-areal-konsesi-perkebunan-sawit-ketapang/ informed that there was presence of Orang Utan in PT AER. It has responded through Arrtu Mayak Orangutan Rescue (AMOUR) project. Future plan and progress of project can be accessed through company website in eaglehighplantation.com. https://www.greenpeace.org/seasia/Global/seasia/2016/IOI-Report-Indonesian-lowres.pdf informed that there were deforestation due to fire. This matter has followed up by the company shows document of fire incident report PT AER – Energi Pawan Estate Jan-Sep 2018 which describes chronology of fire incident at the reported areas, photo of incidents, cause of fires, rainfall record and statistics, fire prevention and management, images detected and PT AER map, ground observation sites, conservation project AMOUR and future steps. Future plan and progress of project can be accessed through company website in eaglehighplantation.com</p> <p>12. SIA in PT ABP (Kelampai Mill) has conducted by Sonokeling on July 2012 and also included in AMDAL report dated August 31st 2010. Both report informed that there were no land conflict which negatively disturbed company operational activities. However, according to http://ketapangnews.com/2017/01/sengketa-lahan-antara-isl-dan-abp-berlanjut-ke-hukum/ , it was informed that there was Land dispute with PT Inti Sawit Lestari (PT ISL) in Village of Siantau Raya, Sub-Regency Nanga Tayap. Regarding this matter the company shows Letter from National Land Agency dated November 14th 2016 which mentioned in Point No. 4 that there were no overlapping area of PT ABP with any companies.</p> <p>13. SIA in PT AAN (Kelampai Mill) has conducted by Sonokeling on July 2012 and also included in AMDAL report dated August 31st 2010. Both report informed that there were no land conflict which negatively disturbed company operational activities.</p> <p>14. SIA in PT MKJ (Kelampai Mill) has conducted by Sonokeling on July 2012 and also included in AMDAL report dated October 31st 2011. Both report informed that there were no land conflict which negatively disturbed company operational activities.</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>15. PT MSP: There are no land conflicts</p> <p>16. PT SGSS: There are no land conflicts</p> <p>17. PT SMS: There are no land conflicts</p> <p>18. PT BSU: There are no land conflicts, but there is dispute related to development of smallholder (https://melawinews.com/2018/03/29/warga-tuntut-kebun-plasma-yang-dijanjikan-pt-akm-dan-pt-bsu/). Based on document review BSU has develop plasma for an area 101.82 Ha. Community on behalf Koperasi Bukit Ganai has had partnership agreement for develop oil palm plantation based on agreement No. 009/KOP-BG-VIII/2016; 019/EHP-BSU/VIII/2016 on 31 August 2016.</p> <p>19. PT AKM: There are no land conflicts, but there is dispute related to development of smallholder (https://melawinews.com/2018/03/29/warga-tuntut-kebun-plasma-yang-dijanjikan-pt-akm-dan-pt-bsu/). Based on document review AKM has develop plasma for an area 638.93 Ha. Community on behalf Koperasi Serba Usaha Berikak Cahaya Lestari also has approve “Perjanjian Pengakuan Hutang” for an area of 638.93 Ha on 23 October 2018. On 2 May 2017 company and Koperasi Serba Usaha Berikak Cahaya Lestari has had partnership agreement for develop oil palm plantation (SPK No. 01/KOP-BCL/V/2017; 01/SPK-01/V/2017).</p> <p>20. PT VMA: There are no land conflicts</p> <p>21. PT WCJU: There are no land conflicts</p> <p>22. PT TSP: There is issue based on website (https://awasmiffee.potager.org/?p=853&lang=id) inform that PT TSP give compensation/ Tali Asih too small and company promises were not fulfilled. Company has conduct land compensation in 2010 for 8 tribe in 3 village for an area 18,337.90 Ha with compensation value IDR 10,000,000,000 (Ten Billion Rupiah).</p> <p>23. MAJ (South Kalimantan): land conflict with Basuang village (https://kalsel.antaraneews.com/berita/5055/kotabaru-antisipasi-konflik-lahan) related to plasma. Based on verification, Desa Basuang not in MAJ operation area.</p> <p>24. KAPAG: No issue</p> <p>25. SKS: land conflict with PT Inhutani II based on website (https://putusan.mahkamahagung.go.id/putusan/e2429fb7e75126c33faee6dece65504/). Has been resolve in court on 2013.</p> <p>26. PT PLS: land conflict with community based on website (https://www.infosawit.com/news/3913/selesaikan-masalah-lahan--dprd-kalsel-bentuk-pansus-) and there issue related to development of smallholder (https://www.borneonews.co.id/berita/24233-takut-dibui-warga-tiga-desa-mengadu-ke-kapolres). Company has resolve by extent the plasma area.</p> <p>27. PT SGA: land conflict with community from Mentewe Village (https://tribratanevstanbu.kalsel.polri.go.id/?p=25000) and has been resolve (http://www.bidikkalsel.co/2015/10/sengketa-lahan-warga-dengan-pt.html).</p> <p>28. PT STP (South Kalimantan): compensation issue from customary people (http://www.aman.or.id/masyarakat-adat-dayak-meratus-gugat-perusahaan-sawit/). EHP management shows document (softcopy) of Court (Pengadilan Negeri of Kotabaru) Verdict No. 02/Pdt.G/2014/PN.Ktb dated 09 February 2015 (Perdata) with conclusion the Court has reject the plaintiff's claim.</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>29. PT JMS (South Kalimantan): land conflict with Cantung Kiri Village (https://kalsel.antaranews.com/berita/5055/kotabaru-antisipasi-konflik-lahan) related to plasma. Land conflict with community (http://sawitwatch.or.id/2015/03/pengambilalihan-kembali-tanah-adat-yang-telah-digarap-oleh-pt-jaya-mandiri-sukses-jms/). Company has resolve by extent the plasma area.</p>
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Company Group/Holding Statement: There is no issue of labour disputes in uncertified unit. The company also has procedures to deal with complaints workers before they become conflicts. The procedure is stated in Company Regulation article 36.</p> <p>Auditor Verification: Based in information from public source and RSPO website informed:</p> <ul style="list-style-type: none"> • Labour dispute in PT BLP has no exist. • Labour dispute in PT EHP has no exist. • Labour dispute in PT BHL has no exist. • Labour dispute in PT ADS has no exist. • https://www.korankaltim.com/kutai-kartanegara/read/1972/miris-buruh-sawit-hanya-digaji-rp100-ribu-per-bulan informed that there was labour dispute towards minimum wage in PT JMS. However, as informed on ISPO verification in December 2018, it was known that the company has paid wages in accordance with regulation. • Labour dispute in PT MAJ has no exist. • Labour dispute in PT STP has no exist. • Labour dispute in PT SSS has no exist • Labour dispute in PT PCS has no exist • Labour dispute in PT APN has no exist • Labour dispute in PT AER has no exist • Labour dispute in PT ABP has no exist • Labour dispute in PT AAN has no exist • Labour dispute in PT MKJ has no exist • Labour dispute in PT MSP has no exist. • Labour dispute in PT SGSS has no exist. • Labour dispute in PT SMS has no exist. • Labour dispute in PT BSU has no exist. • Labour dispute in PT AKM has no exist. • Labour dispute in PT VMA has no exist. • Labour dispute in PT WCJU has no exist. • PT TSP: there are dispute related to workers in website (http://ipom.global/2017/08/29/eagle-high-dan-rajawali-terkena-pelanggaran-hak-asasi-manusia-di-perkebunan/) related to workers right and in website (https://pusaka.or.id/2016/01/karyawan-sawit-ditembak-perusahaan-harus-bertanggungjawab/) related to Christmas allowance/ THR. Based on document verification known that there is worker who was shot because he attack the office by flush the gasoline. The actions of these workers are due to not being paid for Christmas allowance / THR. But based on company clarification, the Christmas allowance / THR will be give based on procedure and this worker not comply with the procedure. Company has involving related stakeholder such as Labour

2.1 Un-Certified Units or Holdings																		
Section	Requirement	Concerns to Discuss, if any																
		<p>Union, Manpower Agency of Papua and Keerom Regency, employees and Police Officials in solving to case. Furthermore, compensation has been given by the company as agreed by the involved workers.</p> <ul style="list-style-type: none"> • Labour dispute in PT MAJ (South Kalimantan) has no exist. • Labour dispute in PT KAPAG has no exist. • Labour dispute in PT SKS has no exist. • Labour dispute in PT PLS has no exist. • Labour dispute in PT SGA has no exist. • Labour dispute in PT STP (South Kalimantan) has no exist. • Labour dispute in PT JMS (South Kalimantan) has no exist. 																
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Company Group/Holding Statement: The company has a mechanism to evaluate compliance with regulations. In SOP describes procedures for compliance, completeness and groove sections which explain in detail to evaluate compliance with the legislation.</p> <p>Auditor Verification:</p> <ol style="list-style-type: none"> 1. Legal requirement in PT BLP – EHP Mill <ul style="list-style-type: none"> • According to Decree of Land Title (SK HGU), PT BLP has total area for about 8,941.12 ha. • Business Permit which covers about ± 7,500 ha; ± 1,400 ha and 479.20 ha. However, there was additional ongoing process to obtain land title (HGU) from Location Permit which covers about 560.00 ha. The most updated on this matter is there was field Cadasteral mapping resulting Kadasteral Map dated September 4th 2017 for area covers 601.39 ha with scale 1:20,000. 2. PT EHP has Location Permit, Business Permit for oil palm processing with capacity about 60 ton FFB/hour and land title (HGB) for area covers 64.52 ha. Those legal documents were in accordance with actual company operations. 3. PT BHL has a match IUP and HGU, which totaling for about 12,846.00 ha. 4. PT ADS has location permit ± 11,500.00 ha (2000) and ± 7,000.00 ha (2004); IUP-2003 for about ± 11,500.00 ha and HGU for about 5,465.80 ha. 5. PT JMS has IUP for about 21,000.00 ha and HGU for about 14,665.75 ha. However, there were totaling about 1,629.75 ha of PT JMS managed area without HGU, describes on the following Table <table border="1"> <thead> <tr> <th>Estate</th> <th>Area (ha)</th> </tr> </thead> <tbody> <tr> <td>Jatimas</td> <td>456.29</td> </tr> <tr> <td>Gaharu</td> <td>230.59</td> </tr> <tr> <td>Trembesi</td> <td>104.31</td> </tr> <tr> <td>Angsana</td> <td>259.45</td> </tr> <tr> <td>Bangkirai</td> <td>27.09</td> </tr> <tr> <td>Kulim</td> <td>552.02</td> </tr> <tr> <td>Total</td> <td>1,629.75</td> </tr> </tbody> </table> <p>On the non-HGU area, the company has obtain Location Permit (2014, expired in July 2018) and IUP-2017 for area covers 2,296.17 ha. The most updated on this matter is the company was in process on extending Location Permit.</p> <p>PT JMS has smallholders with total area about 2,847 ha, which associated in three Cooperatives, namely Leka Mandiri, Keham Lestari</p>	Estate	Area (ha)	Jatimas	456.29	Gaharu	230.59	Trembesi	104.31	Angsana	259.45	Bangkirai	27.09	Kulim	552.02	Total	1,629.75
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2.1 Un-Certified Units or Holdings

Section	Requirement	Concerns to Discuss, if any																																				
		<p>and Agung Baya. As per July 2018, the cooperatives has area about 773 ha, 791 ha and 1,283 ha, respectively.</p> <p>6. PT MAJ has IUP-2006 for about 21,000 ha (Last Location Permit in 2014 was about 7,242.00 ha) and HGU for about 5,027.90 ha. However, there was additional ongoing process to obtain land title (HGU) from Location Permit (2014) which covers about 1,400.00 ha; and IUP (2013) for area covers 1,341.00 ha. Update on this matter are:</p> <ul style="list-style-type: none"> • The company has sent request Letter for Kadasteral measurement mapping on July 10th 2014. • Extension on location permit. • Inventarisasi on land compensation. <p>7. PT STP has Location permit (2006) and IUP (2007) for 17,500 ha; but only has HGU for about 5,005 ha.</p> <p>8. PT SSS has a match IUP and HGU, which totaling about 20,220.92 ha.</p> <p>9. PT PCS has IUP totaling for about ± 11,203 ha. However, the company was still ongoing to obtain land title (HGU). As per update during partial assessment, it was informed that the progress is already on "Risalah Panitia B" or Kadasteral mapping.</p> <p>10. PT APN has IUP 17,300 ha. There was discrepancies about 44.57 ha between HGU Decree (11,924.48 ha) and Certificate (11,879.91 ha) (Decree>Cert.). This is due differences between "Peta Bidang" as mentioned in HGU Decree and "Surat Ukur" as mentioned in Certificate. Detail on hectare statement is presented in the following Table:</p> <table border="1" data-bbox="722 1108 1342 1563"> <thead> <tr> <th>No. NIB</th> <th>Peta Bidang (SK HGU – 2013)</th> <th>Surat Ukur (Cert. HGU – 2013)</th> </tr> </thead> <tbody> <tr><td>098</td><td>271.04</td><td>190.40</td></tr> <tr><td>099</td><td>5.28</td><td>5.17</td></tr> <tr><td>100</td><td>4.12</td><td>3.95</td></tr> <tr><td>101</td><td>33.07</td><td>32.57</td></tr> <tr><td>102</td><td>110.44</td><td>109.88</td></tr> <tr><td>103</td><td>4,243.09</td><td>4,239.19</td></tr> <tr><td>104</td><td>1,235.90</td><td>1,235.91</td></tr> <tr><td>105</td><td>2,426.30</td><td>2,570.09</td></tr> <tr><td>106</td><td>3,075.43</td><td>3,077.25</td></tr> <tr><td>107</td><td>519.92</td><td>415.50</td></tr> <tr><td>Total</td><td>11.924.48</td><td>11,879.91</td></tr> </tbody> </table> <p>11. PT AER has Location permit for about 16,000 ha and IUP-2011 for about 15,690 ha. However, there is no land title (HGU). The most updated on this matter is there was field kadasteral mapping resulting Kadasteral Map dated December 16th 2011 for area covers 11,650.09 ha with scale 1:40,000.</p> <p>12. PT ABP has Location permit for about 13,870 ha and IUP-2011 for about 6,947 ha. However, there is no land title (HGU). The most updated on this matter is there was field mapping resulting Kadasteral Map dated November 29th 2017 for area covers 4,295.47649 ha with scale 1:30,000.</p> <p>13. PT AAN has Location permit for about 13,250 ha and IUP-2011 for about 11,950 ha. However, there is no land title (HGU). The most updated on this matter is there was field mapping resulting Kadasteral Map dated December 30th 2011 for area covers 11,944.61 ha with scale 1:30,000.</p> <p>14. PT MKJ has Location Permit-2014 for about 7,300.00 ha; IUP-2012 for about</p>	No. NIB	Peta Bidang (SK HGU – 2013)	Surat Ukur (Cert. HGU – 2013)	098	271.04	190.40	099	5.28	5.17	100	4.12	3.95	101	33.07	32.57	102	110.44	109.88	103	4,243.09	4,239.19	104	1,235.90	1,235.91	105	2,426.30	2,570.09	106	3,075.43	3,077.25	107	519.92	415.50	Total	11.924.48	11,879.91
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2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>4,372.00 ha. However, there is no land title (HGU). the company shows request letter of Kadasteral measurement to BPN dated September 7th 2016.</p> <p>15. PT MSP: has obtain HGU for 6,527 Ha and IUP for 13,950 Ha.</p> <p>16. PT SGSS: has obtain IUP for 7,000 Ha. HGU not yet process because the company on going for land compensation, until 2015 has compensated for area 960 Ha.</p> <p>17. PT SMS: has obtain HGU decree for an area of 4918.5508 Ha, but HGU certificate not yet issued.</p> <p>18. PT BSU: has obtain IUP for 6,000 Ha. HGU not yet process, because the company on going for land compensation, until 2013 has compensated for area 1,380.58 Ha</p> <p>19. PT AKM: has obtain approval for cadastral but not yet conduct measurement. The company will consultation with BPN related to this case.</p> <p>20. PT VMA: has obtain decree to release forest area in 27 June 2013 for area 20,325.20 Ha. HGU not yet process because there is complaint from NGO (green peace). After that company conduct HCS and the result is only 3000 Ha with no HCS in separate area. Now the company is stop to develop in this area.</p> <p>21. PT WCJU: has obtain decree to release forest area in 29 August 2014 for area 3,803.79 Ha. The Company already submit for cadastral on 31 August 2018 for an area 3,760 Ha (3000 Ha own estate and 760 Ha plasma).</p> <p>22. PT TSP: has obtain HGU (13,143 Ha) and HGB (32.87 Ha).</p> <p>23. PT MAJ (South Kalimantan): cadastral on July 2007 (scale 1:27000) with total area 4,995.237 Ha (2,708.012 Ha available and the rest in not available). On 2009, there was spatial change and some area of company permit located in wildlife reserve.</p> <p>24. PT KAPAG: has obtain HGU (1806 Ha) with IUP 1806 Ha.</p> <p>25. PT SKS: Has obtain IUP (8,050 Ha), cadastral on 29 November 2007 with total area 5002 Ha (146 Ha available and the rest in forest production area). The company is process to release the forest production area but until now not yet finish.</p> <p>26. PT PLS: Has obtain HGU (1,752 Ha) and HGB (41.66 Ha) with IUP 4,407.62 Ha.</p> <p>27. PT SGA: has obtain HGU (6,788 Ha) on 1999 and IUP on 2000. On 2009, there was spatial change and indicate that 1,413 Ha located in forest production area. The company is process to release the forest production area but until now not yet finish.</p> <p>28. PT STP: has obtain HGB (14.56 Ha) on 2008 with IUP 7614.56 Ha on 2006. The company has process the HGU but not yet finish, because there is indication that company area located in forest production area. The company is process to release the forest production area but until now not yet finish.</p> <p>29. PT JMS: has obtain HGU (1614.39 Ha) and IUP 22,678 Ha. On 2009, there was spatial change and indicate that 1,152 Ha located in forest production area. The company is process to release the forest production area but until now not yet finish.</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 at ASA-1

NCR No.	: 2020.01	Issued by	: Arif Faisal Simatupang
Date Issued	: 20 March 2020	Time Limit	: 19 June 2020
NC Grade	: Critical	Date of Closing	: 20 May 2020
Standard Ref. & Requirement	<p>3.8.16 Business Transaction Registration</p> <p>i. Shipping Announcement / Delivery on the RSPO IT Platform must be made by MCC when the product is sold as an RSPO certified product to refineries, crushers and traders no later than 3 months after the date of shipment or the date of shipping documents.</p> <p>ii. Deleting: If RSPO certified volumes are sold through other schemes or in a conventional manner, or if the amount of production is below what it should be, then loss or damage must be removed in the RSPO IT Platform.</p>		
<p>Evidence observed (filled by auditor):</p> <ul style="list-style-type: none"> Quota certified volume data for the period 10 May 2019 to 09 May 2020 on palm trace CSPO 38,444 MT and CSPK 7,094 MT Current remaining palm trace period data CSPO: 24,144 MT & CSPK: 5,444 MT. CSPO & CSPK sales data for May 1 2019 - February 29 2020: <ul style="list-style-type: none"> CSPO is sold as a certified product of 14,300 MT. CSPK is sold as a certified product of 1,650 MT. Based on Delivery Order documents for period 1 May 2019 - 29 February 2020 <ul style="list-style-type: none"> CSPO sold as conventional products is 22,900 MT. CSPK sold as conventional products amounted to 5,050 MT. Transaction report data (Palm Trace) is known to have no credit sales. <p>Non-Conformance Description (filled by auditor): Based on the data above, the company has not been able to show a reduction (removed stock) of CSPO Conventional sales of 22,900 MT and CSPK of 5,050 MT on palm trace or opportunities in selling by claim.</p> <p>Root Cause Analysis (filled by organization audited): Understanding of how to input (input data) by the responsible section of the RSPO IT Platform (Palmtrace) still needs to be improved.</p> <p>Correction (filled by organization audited): Input sales data of CSPO products sold conventionally on the RSPO IT Platform / Palm Trace (Exhibit Attachment 1)</p> <p>Corrective Action (filled by organization audited): Conduct training / re-understanding of officers responsible for data input on the RSPO IT Platform (Palmtrace) as stipulated in the SOP of Raw Material Supply Chain and Production Results Point 7 (SOP No.: SOP-OTH-F3-022, Rev 1.0 dated January 10, 2019).</p> <p>Proof of improvement:</p> <ul style="list-style-type: none"> Minutes of data input training implementation at the RSPO IT Platform (Appendix 2) Raw Material Supply Chain SOP and Production Results (SOP No.: SOP-OTH-F3-022, Rev 1.0 dated January 10, 2019) (Appendix 3) <p>Evidence of removed stock on Palm Trace, namely: from 33,756 MT to 31,108 MT or 2,648 MT for CSPO and from 8,520 MT to 6,969 or 1,551 MT for CSPK (Appendix 1).</p> <p>Assessor Evaluation and Conclusion (filled by auditor)</p>			

Verification May 20, 2020

The company has shown evidence including:

- EHP Training Record dated 8 May 2020 related to Raw Material Supply Chain SOP and Production Results Point 7 (SOP No. SOP-OTH-F3-022, Rev 1.0 dated January 10, 2019) with 7 participants.
- Raw Material Supply Chain SOP and Production Results (SOP No.: SOP-OTH-F3-022, Rev 1.0 dated January 10, 2019) (Appendix 3)
- Proof of removal on the palm trace dated 18 May 2020 for CSPO of 2,648 MT and CSPK of 1,551 MT with stock transaction IDs ST-TR-b26504a2-58b2 and ST-TR-b630fd5e-6390.

Related to this, the non-conformity No. 2020.01 has been declared fulfilled.

Verified by : **Arif Faisal Simatupang**

NCR No.	: 2020.02	Issued by	: Yudhi Yuniarto Tallutondok
Date Issued	: 20 March 2020	Time Limit	: 19 June 2020
NC Grade	: Critical	Date of Closing	: 19 June 2020
Standard Ref. & Requirement	6.7.3 Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
Evidence observed (filled by auditor):			
<ol style="list-style-type: none"> 1. Internal COO Memo to all Regional Heads under number 044/COO/Personal Protective Equipment/VI-18 dated June 25, 2018 concerning the Implementation of OHS and Use of Personal Protective Equipment. The document explained the standard of personal protective equipment in estate, mill, workshops, civil and infra. In point 6 it is explained in relation to routine replacement of PPE that is no longer suitable for use. 2. Based on field observations and interviews with employees are known to the following matters: <ul style="list-style-type: none"> • Semeru Estate Tractor Operators do not use PPE shoes when working. The results of the interviews revealed that the latest PPE administration was in 2018. • Loose fruit pickers, spray workers, manual workers, grader operators, empty bin operators, land application employees, operators of press station using self-purchased shoe PPE. • Mill oil warehouse officers do not use PPE gloves. 			
Non-Conformance Description (filled by auditor):			
The CH has not been able to show enough evidence that the implementation of the supply/use of PPE is in accordance with the procedures that it has.			
Root Cause Analysis (filled by organization audited):			
Provision of PPE to workers becomes inconsistent due to less than the maximum supervision of the officer responsible (OHS Expert) for the supply of PPE, as well as delays in procurement / supply from vendors.			
Correction (filled by organization audited):			
<ul style="list-style-type: none"> - OHS Expert re-identifies all workers whose PPE is no longer suitable for use (Documents resulting from Damaged PPE identification; Appendix 1) - OHS Expert submits PPE procurement to Management (Letter of Submission / Request for Goods; Attachment 2) - OHS Expert distributes PPE to the workers concerned (Minutes of the Handover of PPE to workers; Appendix 3) 			
Corrective Action (filled by organization audited):			
1. OHS Expert prepares PPE Procurement Plan for 2020 which includes the type, amount and time frame as an effort to monitor			

- PPE procurement to workers. (Appendix 4)
- OHS Expert conducts OHS inspections of workers using the OHS and Environmental Inspection Results Form as stipulated in the SOP of the Area Safety Inspection and Working Tools (Document No. SOP-OTH-F3-005, Version 2.0 dated January 10, 2019) (Appendix 5).

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification June 19, 2020

The company showed some evidence of improvement including:

- Identify the PPE period 2020 PT EHP and BLP that informs the damage of shoes, helmet straps, rubber gloves, goggles, and buoys for plantation and factory employees.
- Proof of Request for Use of Goods for types of rubber gloves, boots, helmets, masks, safety shoes, safety goggles, cloth gloves, helmet straps and buoys.
- Minutes of PPE handover to plantation and factory employees on March 17-18, 2020. Handover documentation is available.
- PPE procurement plans for estate and mill employees for the 2020 period.
- OHS Inspection implementation documents by OHS Experts in each unit. In this document, it is known that each worker has used the appropriate PPE when working.

Based on the above, the non-conformity is stated to be fulfilled by observing the notes on the next assessment.

Verified by : **Yudhi Yuniarto Tallutondok**

NCR No.	: 2020.03	Issued by	: Yudhi Yuniarto Tallutondok
Date Issued	: 20 March 2020	Time Limit	: Next Surveillance
NC Grade	: Non-Critical	Date of Closing	: 16 December 2020
Standard Ref. & Requirement	: 6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection		

Evidence observed (filled by auditor):

- Based on field observations and interviews with daily worker and fertilizer worker of Bromo Estate revealed that daily worker had not been included in the health and employment insurance programs.
- Employment insurance receipt of ARJE unit for the period September 2019 with the reference number 191005159515 for 425 employees.
- Employment insurance receipt of BRME unit for the period September 2019 with the reference number 191005159597 for 214 employees.
- Employment insurance receipt of SMRE unit for the period September 2019 with the reference number 191005159668 for 246 employees.
- Employment insurance receipt of EHPM unit for the December 2019 with the reference number 200104395118 for 115 employees.
- Employment insurance receipt of BLP units for the period September 2019 with the reference number 191005187352 for 549 employees.
- CH communication documents with BPJS Employment via electronic mail on 18 February 2020 stating that the CH can make payments for 1 month in advance and for further payments starting on 1 March 2020. However, until the audit activities take place, it cannot be demonstrated evidence that the CH has paid employment and health insurance contributions for the period October 2019 - February 2020 for PT BLP and the period January - February 2020 for PT EHP.

Non-Conformance Description (filled by auditor):

The CH has not been able to show enough evidence that all workers are covered by accident insurance.

Root Cause Analysis (dilengkapi oleh organisasi yang diaudit):

1. Loose fruit pickers workers and fertilizer employees have not been included in the BPJS program because these employees are new to work, have not been evaluated to be included as candidates to be included in the employee appointment program.
2. There have been several significant declines in CPO prices during 2019 to early 2020, the budget prepared for BPJS payments has been postponed for some time (rescheduling) due to other needs that must take precedence. This problem has been verbally communicated to the BPJS and there are no problems from BPJS.

Correction (dilengkapi oleh organisasi yang diaudit):

1. There has been a periodical appointment of employees (attached document), so that BPJS TK and KS can be registered
2. Make BPJS TK payments for the period October – February 2020 (payment documents and details are attached). Note: In the details of the payment per estate, doc DUTK, if a password is required, please fill in the number in the middle in the title of the pdf dock.

Make payments for BPJS TK for the period January – March 2020 (attached document).

Corrective Action (dilengkapi oleh organisasi yang diaudit):

BOD is committed to continuing to comply with applicable laws and regulations including the participation and payment of this BPJS, there is communication built between the company and BPJS so that BPJS can become a partner in terms of the company's efforts to fulfill its obligations including consultation on payments etc.

Evaluasi Penilai dan Kesimpulan (dilengkapi oleh auditor):

16 December 2020

The company sends proof of evidence as follows:

ARJE

- Recapitulation of Payment Details of BPJS Employment Contribution for October 2019 period for 425 employees with a value of Rp 120,035,450
- Recapitulation of Payment Details of BPJS Employment Contribution for November 2019 period for 425 employees with a value of Rp 119,421,278
- Recapitulation of Payment Details of BPJS Employment Contribution for the period of December 2019 for 423 employees with a value of Rp 118,855,458
- Recapitulation of Payment Details of BPJS Employment Contribution for January 2020 period for 421 employees with a value of Rp 121,029,418
- Recapitulation of Payment Details of BPJS Employment Contribution for the period of February 2020 for 421 employees with a value of Rp 121,166,794
- Recapitulation of Payment Details of BPJS Employment Contribution for March 2020 period for 421 employees with a value of Rp 121,254,403
- Proof of payment for BPJS Employment for the period October 2019 - March 2020 on September 14, 2020 with a value of IDR 726,457,703.
- List of employees for the period October 2019 – March 2020.

BRME

- Recapitulation of Payment Details of BPJS Employment Contribution for the period of October 2019 for 210 employees with a value of IDR 59,086,725
- Recapitulation of Payment Details of BPJS Employment Contribution for the period of November 2019 for 219 employees with a value of Rp. 61,624,331
- Recapitulation of Payment Details of BPJS Employment Contribution for the period of December 2019 for 215 employees with a value of Rp 60,492,691
- Recapitulation of Payment Details of BPJS Employment Contribution for January 2020 period for 216 employees with a value of Rp 62,432,976
- Recapitulation of Payment Details of BPJS Employment Contribution for the period of February 2020 for 219 employees with a value of Rp. 63,305,180
- Recapitulation of Payment Details of BPJS Employment Contribution for March 2020 period for 220 employees with a value of Rp 63,595,917
- Proof of payment for BPJS Employment for the period October 2019 - March 2020 on September 14, 2020 with a value of IDR 371,986,545.
- List of employees for the period October 2019 – March 2020.

SMRE

- Recapitulation of Payment Details of BPJS Employment Contribution for October 2019 period for 246 employees with a value of Rp 69,558,416
- Recapitulation of Payment Details of BPJS Employment Contribution for November 2019 period for 250 employees with a value of IDR 70,245,233
- Recapitulation of Payment Details of BPJS Employment Contribution for the period of December 2019 for 251 employees with a value of IDR 70,528,141
- Recapitulation of Payment Details of BPJS Employment Contribution for the January 2020 period for 248 employees with a value of Rp. 71,553,633
- Recapitulation of Payment Details of BPJS Employment Contribution for the period of February 2020 for 252 employees with a value of IDR 72,758,550
- Recapitulation of Payment Details of BPJS Employment Contribution for March 2020 period for 255 employees with a value of Rp. 73,539,327
- Proof of payment for BPJS Employment for the period October 2019 - March 2020 on September 14, 2020 with a value of IDR 429,736,449.
- List of employees for the period October 2019 – March 2020.

BRMA

- Recapitulation of Payment Details of BPJS Employment Contribution for October 2019 period for 131 employees with a value of Rp 36,923,350.
- Recapitulation of Payment Details of BPJS Employment Contribution for November 2019 period for 132 employees with a value of IDR 37,206,259.
- Recapitulation of Payment Details of BPJS Employment Contribution for the period of December 2019 for 129 employees with a value of Rp 36,357,529.
- Recapitulation of Payment Details of BPJS Employment Contribution for the January 2020 period for 129 employees with a value of Rp 37,321,914.
- Recapitulation of Payment Details of BPJS Employment Contribution for February 2020 period for 129 employees with a value of IDR 37,363,890.
- Recapitulation of Payment Details of BPJS Employment Contribution for March 2020 period for 127 employees with a value of Rp 36,782,422.
- Proof of payment for BPJS Employment for the period October 2019 - March 2020 on September 14, 2020 with a value of IDR 222,410.052.
- List of employees for the period October 2019 – March 2020.

Casual Workers

The company shows proof of payment of BPJS Employment for casual workers for the period October 2019 – March 2020 with a value of Rp 51,711,839 for 31 employees.

EHP

- Recapitulation of Payment Details of BPJS Employment Contribution for the January 2020 period for 9 employees with a value of IDR 5,696,782.
- Recapitulation of Payment Details of BPJS Employment Contribution for February 2020 period for 8 employees with a value of IDR 4,496,757.
- Recapitulation of Payment Details of BPJS Employment Contribution for March 2020 period for 9 employees with a value of Rp 6,686,498
- Proof of payment for BPJS Employment for the period January - March 2020 on August 7, 2020 with a value of Rp. 16,880,037 for 9 employees.
- The proof of payment received in the first email is proof of payment of BPJS for staff, then there is a follow-up in the second email for proof of payment Jan-Mar 2020 for non-staff.
- A detailed list of employees for BPJS payments is attached, along with proof of payment for 3 months sent back. Total employees 123 (9 staff and 114 non staff).
- Recapitulation of Payment Details of BPJS Employment Contribution for January 2020 period for 114 employees with a value of Rp 34,366,814
- Recapitulation of Payment Details of BPJS Employment Contribution for February 2020 period for 114 employees with a value of

Rp 34,451,431

- Recapitulation of Payment Details of BPJS Employment Contribution for March 2020 period for 113 employees with a value of Rp 34,146,076
- Proof of payment for BPJS Employment for the period January - March 2020 on August 7, 2020 with a value of Rp. 103,147,184 for 114 employees.
- List of employees for the period January – March 2020.

Based on the foregoing, the discrepancy is declared to be fulfilled with the observation notes in the next assessment.

Verified by :

NCR No.	: 2020.04	Issued by	: Radytio Puspanjana
Date Issued	: 20 March 2020	Time Limit	: Next Surveillance
NC Grade	: Non Critical	Date of Closing	: June 12, 2020
Standard Ref. & Requirement	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Evidence observed (filled by auditor): Procedure for management and monitoring of waste No. SOP-OTH-F3-004 January 10 2019, the procedure explained that hazardous waste shall store on temporary hazardous waste storage. Based on the results of the field visit known: <ul style="list-style-type: none"> - Used lubrycant drum behind Arjuna Estate fertilizer warehouse. - Used paint packaging on workshop Arjuna Estate - Used paint packaging on warehouse Arjuna Estate - Used lubrycant drum on WTP EHP POM - Used lubrycant drum on lubrycant warehouse EHP POM - Used coustic soda drum on lubrycant warehouse EHP POM <p>The company has not been able to demonstrate implementation of hazardous waste management accordance with procedures SOP No. SOP-OTH-F3-004 January 10, 2019 related waste management and monitoring.</p> <p>Non-Conformance Description (filled by auditor): The company has not been able to prove the proper disposal of waste materials according to procedures that are fully understood by workers and managers.</p> <p>Root Cause Analysis (filled by organization audited): <ol style="list-style-type: none"> a. Lack of understanding by warehouse, workshop and generator house operators, mill employees related to the management of Hazardous and Toxic Waste as regulated in SOP No.SOP-OTH-F3-004 dated January 10, 2019 regarding waste management and monitoring and Instructions Hazardous and Toxic Material Management and Monitoring Work (Document No.: IKA-OTH-F3-04-01, Version 1.0 dated 13 January 2019). b. Inconsistency of officers in conducting OHS inspections including Hazardous Waste management <p>Correction (filled by organization audited): Delivery of hazardous waste in the form of used oil drums behind the Arjuna Estate fertilizer warehouse, used paint packaging for Arjuna Estate workshop, used paint packaging in the Arjuna Estate warehouse and WTP employees, chemical and oil warehouse at the mill. (Minutes of Waste Delivery to hazardous TPS, attached)</p> <p>Corrective Action (filled by organization audited):</p> </p>			

1. Conduct training/re-understanding related to hazardous waste management to all warehouse and workshop operators (Minutes of the implementation of hazardous waste management training to warehouse operators, workshops and generator houses, and mill employees)
OHS Expert (Sustainability Section) conducts intensive OSH inspections including the implementation of OHS management as regulated in the SOP for Area and Work Equipment Safety Inspections (Document for OHS Inspection implementation by OHS Experts, Attachment 3).

Assessor Evaluation and Conclusion (filled by auditor):

Auditor verification June 12, 2020

The company shows evidence of improvement in the form of:

- Minutes of hazardous waste management training and socialization on March 23, 2020 to warehouse, workshop and generator officers regarding procedures for B3 waste management in accordance with SOP No. OTH-F3-004/
- OHS inspection documents and warehouse, workshop, housing, fuel stations and generator housing environments dated March 16, 2020.
- OHS and environmental inspection documents for hazardous waste storage and final waste disposal sites dated March 16, 2020.
- Minutes of the handover of B3 waste from Arjuna Estate to B3 waste TPS as of March 17, 2020 which explains that B3 waste has been transported in the form of used oil drums as many as 35 pcs of 2 pcs used paint cans.
- Hazardous waste log book as of March 17, 2020 which explains that 35 pcs of B3 waste has been stored in the form of used oil drums.
- Minutes of hazardous waste management training and socialization on March 23, 2020 to warehouse, workshop and generator officers regarding procedures for B3 waste management in accordance with SOP No. OTH-F3-004.
- Hazardous waste log book as of March 2, 2020 which explains that B3 waste has been stored in the form of 12 pcs of used oil drums, 10 pcs of used chemical B3 packaging, 27 pcs of used chemical B3 cans.
- Minutes of handover of B3 waste from EHP PKS to B3 waste TPS as of March 2, 2020 which explains that hazardous waste has been transported in the form of 12 pcs of used oil drums, 10 pcs of used B3 chemical packaging, 27 pcs of used hazardous chemical cans

Based on the evidence of improvement submitted, it is concluded that Non-conformance No.2020.04 has been fulfilled.

Verified by	:	Radytio Puspanjana
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3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-2 (Remote Audit)

NCR No.	: 2021.01	Issued by	: Johannes Kapri Pandiangan
Date Issued	: 16 Juli 2021	Time Limit	: ASA-3
NC Grade	: Minor (non critical)	Date of Closing	: 8 June 2022
Standard Ref. & Requirement	: 7.7.2 Inventory, document, and report peat areas in the managed area (effective from 15 November 2018)		
<p>Evidence observed (filled by auditor): Based on document of areal statement PT BLP and Map of peat and mineral area it was known the total of peat area covering 4.474.78 Ha, however in RSPO Peat Inventory Reporting Summary PT Eagle High Plantation Tbk which has been delivered to RSPO on 12 March 2020 it was known total peat area reported are 3,202 Ha with details 3050 Ha planted area and 152 ha peat rehabilitation area.</p> <p>Non-Conformance Description (filled by auditor): There is discrepancy between total area of peat in company operational area.</p> <p>Root Cause Analysis (filled by organization audited): There was an error / human error in including the data on the area of the peat area of PT. BLP into the RSPO peat inventory format so that there is a difference in data between the area statement and the data in the peat inventory that is sent to the RSPO.</p> <p>Correction (filled by organization audited):</p> <ul style="list-style-type: none"> • Check and review all data on the area of peat areas that have been submitted to the RSPO, and ensure that all data are correct and valid. • Resubmit peat inventory data to RSPO with correction of peat area data at PT.BLP. <p>Corrective Action (filled by organization audited): Perform a double check by the relevant departments such as: GIS, Ops.Estate, Sustainability if there is a request for similar data by an external party.</p> <p>Assessor Evaluation and Conclusion (filled by auditor):</p> <p>Verification on June 8, 2022 The company shows evidence of improvement in the form of :</p> <ul style="list-style-type: none"> • Revised Peat Inventory that includes the same peat area as the statement area. • Email proof of delivery of peat inventory which has been received/replied by the RSPO secretariat. <p>Based on the explanation above, the discrepancy is declared fulfilled and will be observed in the next assessment (closed with observation).</p>			
Verified by	: Haikal Ramadhan Kharismansyah		

3.4.3. Identification of Findings, Corrective Actions and Observations at ASA-2 & ASA-3 (Onsite Audit)

NCR No.	: 2022.01	Issued by	: Haikal Ramadhan Kharismansyah
Date Issued	: 10 June 2022	Time Limit	: 8 September 2022
NC Grade	: Major	Date of Closing	: 8 September 2022
Standard Ref. & Requirement	: 2.1.1 The unit of certification complies with all relevant laws and regulations.		
Evidence observed (filled by auditor):			
<p>1. Compliance with regulations related to operator licenses</p> <ul style="list-style-type: none"> • Steam Operators <ul style="list-style-type: none"> - From the SIO operator list, it is known that there are 2 employees who have attended class I steam aircraft training. - Based on field visits and interviews with PKS workers, it is known that PKS has a boiler (steam plane) with a capacity of 50 tons/hour - Permenaker No. 01 of 1988, in Appendix 1 it is explained that for a boiler capacity of >40 T/h - <60 T/h, it requires 1 class I operator and 2 class II operators for each shift. - Based on the list of PKS employees, it is known that there are a total of 6 employees in charge of operating boiler machines which are divided into 2 work shifts (3 people/shift) so that there should be 2 class I steam aircraft operators and 4 class II aircraft operators. • Power and Production Aircraft Operators <ul style="list-style-type: none"> - Permenaker No. 38 of 2016 in Articles 110, 111 and Table E it is explained that for a prime mover engine with a power of > 214.47 HP or 200 kVa, it must have a power and production aircraft operator in each shift. - Based on field visits and interviews with PKS workers, it is known that PKS has 3 generators with a capacity of 335 kVa and 355 kVa with operating status and 605 kVa with damaged status which are operated by operators with 3 shift changes. - The company shows the entire list of PKS employees' SIO, which includes 2 employees for 2 shifts who have attended generator operator training, but the SIO of 1 employee on the third shift has not been shown. - Based on field visits and interviews with plantation workers, it is known that Bromo and Semeru Estate have a generator with a capacity of 250 kVa and Arjuna Plantation with a capacity of 350 kVa, but the company has not been able to show the SIO of the operator operating the three generators. • Transport Aircraft Operators <ul style="list-style-type: none"> - Permenaker No. 9 of 2010 in article 5 paragraph 1 states "lifting and transporting aircraft must be operated by lift and transport aircraft operators who have K3 licenses and workbooks according to their types and qualifications". - Based on a field visit at Arjuna Plantation Division 1 Block C41, it was found that a worker with the initials BP was operating a Backhoe Loader. - The company shows the entire list of SIO employees of the Plantation, but has not been able to show the SIO for lift and transport aircraft operators with the initials BP. <p>2. PKWT Recording</p> <ul style="list-style-type: none"> • The document registering the workers of PT Eagle High Plantation and PT Bumilanggeng Perdanatrada for the period of May 2022 it is known that there are 578 workers with Daily Worker status. • Government Regulation No. 35 of 2021 → Contract Worker (PKWT) can be done with a daily work agreement. The PKWT must be registered by the entrepreneur at the ministry that organizes matters in the field of manpower online no later than 3 (three) days from the signing of the PKWT. In the event that the online PKWT registration is not yet available, then the PKWT registration is carried out by the entrepreneur in writing at the office that carries out government affairs in the Regency/City Manpower sector no later than 7 (seven) working days from the signing of the PKWT. <p>Non-Conformance Description (filled by auditor):</p> <ol style="list-style-type: none"> 1. The company has not been able to show sufficient evidence that it has sufficient number of licensed operators in accordance with the regulations (4 class II steam aircraft operators, 4 power and production aircraft operators and lift and transport aircraft operators for employees with initials BP). 2. The company has not been able to show sufficient evidence that it has registered PKWT workers as stated in PP35 of 2021. 			

Root Cause Analysis (filled by organization audited):

OHS License Training for operators:

- There is a mutation of employees who already have a boiler operator license to another section
- The situation for the last 2 years (2020 – 2021) is still in a COVID-19 condition where the schedule and number of OHS License Training Providers for Operators is very limited.
- Mill operational activities that do not allow all operators to conduct OSH license training because it will cause operational activities to stop

Contract Worker Registration

- There is no regular monitoring and data collection for every new worker that is received
- It has not been evenly disseminated to the person in charge of employment in the company regarding the obligation to register contract workers

Correction (filled by organization audited):

OHS License Training for operators:

1. Register and carry out training for 2 people to attend class I steam aircraft training, 2 people to attend class II steam aircraft training, 4 people to take power and production aircraft training and 6 people to take lift and transport aircraft training.
2. Evidence of training has been carried out on 23, 25-29 July 2022 for class I steam aircraft training; 23, 25-28 July 2022 for class II steam aircraft training; 23-29 July 2022 for training on power and production aircraft and 18-20 July for lift-and-transport aircraft together with other business units in the EHP group.

Contract Worker Registration

- PT EHP and PT BLP have sent reports of PKWT workers to the Manpower Office of West Kotawaringin Regency.
- Conduct periodic data collection every month to ensure whether or not there are new workers joining

Corrective Action (filled by organization audited):

OHS License Training for operators:

- Ensure that the OSH license training plan for operators is in accordance with the plan
- The management of PT EHP ensures special competencies every time they transfer/accept new employees for jobs that require special competency requirements

Contract Worker Registration

The HCCS Section ensures that any addition/renewal of workers with contravt status is reported to the Manpower Office of West Kotawaringin Regency in accordance with applicable regulations.

Assessor Evaluation and Conclusion (filled by auditor):

Verification On September 3, 2022

Contract Worker Registration

Companies can show documents:

1. Application for Registration of PT EHP's Specific Time Work Agreement document No. 019/EHPM-Ext/VIII/2022 dated August 19, 2022, for the number of workers as many as 14 people.
2. Application for Registration of PT BLP Work Agreement for a certain period of time, document No. 028/BLP/Ekternal/VIII/2022 dated August 22, 2022, for a total of 338 employees.
3. Receipt of the PKWT recording report by the Manpower and Transmigration Office of West Kotawaringin Regency on August 19, 2022..

Based on the results of corrective action verification, it is known that the company has implemented corrections and explained corrective actions so that the non-conformance does not recur, but the management unit has not been able to identify the root cause of the non-conformity, therefore the non-conformance to the PKWT recording has not been fulfilled.

Operator License

The company shows evidence of improvement in the form of:

1. BAPP concerning construction work and K3 license certification for Boiler and Genset operators on July 29, 2022 which explains that training has been carried out for Boiler operators of 4 people on 23, 25-29 July 2022 and generator operators of 4 people on July 23-29 2022.
 2. BAPP concerning the work of fostering and certifying the K3 license for lift and transport aircraft operators on July 20, 2022, which explains that training has been carried out for lift and transport aircraft operators for 6 people on July 18-20, 2022.
- However, the company's mechanism has not yet been shown to ensure that the training plan is carried out according to plan and to ensure special competencies for each transfer, so that this discrepancy is declared unfulfilled.

Verification On September 8, 2022

Operator License

The company shows proof of corrective action as indicated by internal memo No 012/PC-KALTENG 1/SE/IX/2022 regarding the management of operator licenses at BLP and EHP which explains that every operator who runs a production machine is required to have an SIO and when transferring/mutation of employees those who have SIO must report to the sustainability assistant so that a replacement is programmed for training.

PKWT Registration

Based on the results of the verification of corrective actions, it is known that the company has implemented corrections and explained corrective actions so that non-conformities do not recur and identify the root cause of the problem.

Auditor Conclusion:

Based on root cause analysis, corrections, and corrective actions for non-conformances for PKWT Registration and Operator Licenses are declared to have been fulfilled and will be observed. Return to the next assessment

Verified by : **Haikal R Kharismansyah**

NCR No.	: 2022.02	Issued by	: Haikal Ramadhan Kharismansyah
Date Issued	: 10 June 2022	Time Limit	: 8 September 2022
NC Grade	: Major	Date of Closing	: 8 September 2022
Standard Ref. & Requirement	6.2.2 There is a work agreement along with related documents that stipulates detailed wages and work requirements (for example regular working hours, deductions, overtime, sick leave, right to vacation (leave), maternity leave, reasons for dismissal, notification period before dismissal, etc. in accordance with national regulatory requirements) and salary breakdown documents that provide accurate information on compensation for work performed.		

Evidence observed (filled by auditor):

1. Based on the list of workers in May 2022, it is known that workers with the initials YNT are registered as loose-fitting workers with Daily Worker status and have been working since 26 June 2021.
2. From the Worker Agreement, it is shown that the validity period of the agreement is from 26 June 2021 to 26 September 2021. In the WA it is written that the basic wage/day is Rp. 123,088.72, which should be for the period of 2022.
3. The results of interviews with the workers concerned in block F27B ARJE obtained information that they have never signed a work agreement with the company

Non-Conformance Description (filled by auditor):

The company has not been able to show sufficient evidence that all employees have a valid employment agreement.

Root Cause Analysis (filled by organization audited):

- Lack of supervision and coordination from relevant departments (Division, Estate, and HCCS) so that there are TK that do not yet have SPK

- There is a change of leadership so that there are SPK that have not been signed

Correction *(filled by organization audited):*

- Re-identify anyone who does not yet have an SPK and make a new SPK in 2 (two) copies and submit one of them to the workers.
- Hold discussions on the composition of kindergartens and their supporting equipment for each monthly meeting and involve the HCCS team

Corrective Action *(filled by organization audited):*

- If in the future there is a change of Estate Manager, the contract SPK will be signed by HCCS.
- Discussing the composition of TK regularly at every monthly meeting including identification of the completeness of new employee documents

Assessor Evaluation and Conclusion *(filled by auditor):*

Verification On September 6, 2022

Companies can show documents:

- Minutes of the list of names of workers who received SPK for BHL employees for the Bromo Estate Division I unit totaling 54 workers.
- Minutes of the list of names of workers who received SPK for BHL employees for the Bromo Estate Division II unit totaling 59 workers.
- Minutes of the list of names of workers who received SPK for BHL employees for the Bromo Estate Division III unit totaling 69 workers.
- Minutes of the list of names of workers who received SPK for BHL employees for the Bromo Estate Big Office unit with a total of 13 workers.
- Minutes of the list of names of workers who received SPK for BHL employees for all divisions in Arjuna Estate totaling 197 workers.
- Minutes of the list of names of workers who received SPK for BHL employees for all divisions in Semeru Estate totaling 15 workers.
- SPK documents that have been signed by workers, including for 5 employees of the Bromo Estate unit, 1 worker of the Arjuna Estate unit and 2 workers of the Semeru Estate unit. For example, SPK No. 014/BLP.BRME-HCCS-PKWT/VII/2022 dated 22 July 2022 between the company (represented by EM BRME) and an employee with the initials FSA, with a validity period of 3 months from the date of stipulation.

Based on the results of the verification of the root cause analysis, corrections and corrective actions, it is known that there are still several points of auditor response that need to be followed up. Thus the discrepancy has not been met.

Verificaton On September 8, 2022

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

1. Identify the completeness of TK documents including SPK updates up to September 7, 2022
2. Minutes of monthly meeting between HCCS and Operational Team
3. Checklist of completeness of documents for each worker including documentation of submission of SPK to each person (proof has been signed and received)

Auditor Conclusion:

Based on the root cause analysis, corrections, and corrective actions taken for non-conformities are declared to have been fulfilled and will be observed again in the next assessment.

Verified by : **Haikal R Kharismansyah**

Standard Ref. & Requirement	6.2.3 Evidence of legal compliance for regular working hours, deductions, overtime, sick leave, entitlement to vacation, maternity leave, reasons for dismissal, notice period before termination of work, and other employment provisions
<p>Evidence observed (filled by auditor):</p> <ul style="list-style-type: none"> Based on the list of employee wages, it is known that there is a proportion of Working Days (WD), for example for ARJE spray employees, for example: <ul style="list-style-type: none"> Initials SPR (Loose fruit picker) → based on the finger print recapitulation document the person concerned works as much as 21 WD while in the wage slip document it is 17.32 WD. Initials JWR (Harvest) → based on the finger print recapitulation document the person in question works as much as 22 WD while in the wage slip document it is 21.66 WD. The management explained that the proportion of WD was due to the workers not getting the basis set by the company (Management's explanation was that the proportion of WD was because the worker concerned did not get the basis when picking loose fruit (picking loose fruit was done using the rotation area system and completing the area). Government Regulation No. 36 of 2021 → Deductions from wages by employers can be made for payment of fines and compensation and are carried out in accordance with the Employment Agreement, Company Regulations or Collective Labor Agreement. Until the assessment is complete, supporting evidence has not been shown that the low output of the worker is indeed due to the worker who does not want to complete his work responsibilities. In the company regulations for the 2020 - 2022 period, article 7 concerning the article on working time states that the determination of working hours for plantation locations is based on the company's needs, namely 7 (seven) hours a day and 40 (forty hours) a week. <p>Non-Conformance Description (filled by auditor): The company has not been able to show sufficient evidence that the wage system applied is in accordance with the provisions of the applicable regulations.</p>	
<p>Root Cause Analysis (filled by organization audited): There is an automatic deduction made in the PMS application system that does not match the internal settings of the memo regarding the remuneration system</p>	
<p>Correction (filled by organization audited): PT BLP has improved the remuneration procedure for workers based on productivity (Basis) through internal Memo no 011/Estate&Mill Dept./IM/VIII/2022 (attached)</p>	
<p>Corrective Action (filled by organization audited): This remuneration system will be determined and adjusted to the PMS system used so that it is clear that there is no difference between absent finger and basic income.</p>	
<p>Assessor Evaluation and Conclusion (filled by auditor):</p> <p>Verification On September 6, 2022 Company can show Internal Memo Np. 011/Estate & Mill Dept./IM/VIII/2022 dated 31 August 2022 regarding Harvester Wages. Based on the verification results, it is known that the internal memo has explained "Under certain conditions, if the base volume of the cut fruit is not achieved, while the target area (hectare) of the random harvest and the effective working hours according to the day in question is achieved, then the Working Day wage is paid 100%. ."</p> <p>Based on the results of the verification of the root cause analysis, corrections and corrective actions, it is known that the company has identified errors in the wage system and compiled an internal memo related to harvesting wages to ensure system errors do not recur. Based on the description above, it can be concluded that the discrepancy in this indicator is declared fulfilled and will be observed in the next audit activity.</p>	
Verified by	: Haikal R Kharismasnyah

NCR No.	: 2020.04	Issued by	: Arief Tajalli
Date Issued	: 10 June 2022	Time Limit	: 8 September 2022
NC Grade	: Minor raise to Major	Date of Closing	: 8 September 2022
Standard Ref. & Requirement	7.3.2 There is evidence of waste disposal according to procedures that are fully understood by workers and managers.		

Evidence observed (filled by auditor):

Based on the results of field observations, document reviews and interviews, the following information was obtained:

Bedaun Mill

1. Based on the results of field visits to the Hazardous Storage Bedaun Mill area, information was obtained that there was no stored B3 contaminated used packaging.
2. Based on the results of interviews with the person in charge of the warehouse, information was obtained that no contaminated packaging had entered the TPS for the period after the last transport.
3. Based on the analysis of the Manifest document, it is known that the last Hazardous transportation was carried out on April 8, 2022 or 2 months before the audit was conducted.
4. Based on the results of the analysis of the Logbook documents for July 2021 – May 2022, information was obtained that there was no B3 packaging waste that went to the Storage.
5. Based on the results of field visits to WTP areas, information was obtained that the company uses chemicals in the water treatment process. In addition, for data on the use of chemicals in 2021, information was obtained that the company used 2,339 Kg of lubricant and 10 Kg of Cycle-Hexane chemicals.

Arjuna Estate

1. Based on the results of field visits to the Hazardous Storage Arjuna Estate area, information was obtained that there was no stored Hazardous contaminated used packaging. In addition, no symbols and labels were installed in the Hazardous Storage area.
2. Based on the results of interviews with the person in charge of the warehouse, information was obtained that the used pesticide packaging was reused to collect water.
3. Based on the analysis of the Manifest Hazardous Storage Arjuna Estate document, it is known that the last Hazardous Storage transportation was carried out on March 8, 2022 or 3 months prior to the audit.
4. In the Logbook document of Hazardous Storage Arjuna Estate for March – May 2022, information was obtained that there was 48 pieces of Hazardous packaging waste that entered the Storage.
5. The results of the interview with the management stated that the transportation is carried out every 1-year period.
6. The results of the interview with the management also stated that the packaging contaminated with B3 such as jerry cans of pesticides and fertilizer sacks was reused. However, the company has not been able to show technical guidance documents related to the reuse of Hazardous contaminated packaging (Jerry cans of pesticides, fertilizer sacks, and others).
7. Based on the results of the analysis of the SOP document Number IKA-OTH-F3-04-01 related to the management and monitoring of B3 waste, it also does not explain the use of Hazardous Waste as regulated in PermenLHK Number 18 of 2020 concerning the use of hazardous and toxic waste.

Regarding the information above, the company has issued circular letter number 022/STT-KALTENG 1/SE/VI/2022 regarding the prohibition of reuse of used pesticide packaging. However, the company has not been able to provide a clear justification regarding the reuse of the used packaging.

By the time the ASA-1 audit was carried out, the management of Hazardous waste had become a non-conformance and the company had taken corrective and corrective actions to meet the non-conformance. However, when the ASA 2 + ASA 3 audit was carried out, it was still found that there was B3 waste that was not managed in accordance with applicable SOPs and regulations.

Non-Conformance Description (filled by auditor):

Based on the evidence obtained, it is concluded that the company has not been able to implement B3 Waste management as regulated in company procedures and applicable laws and regulations, including:

- SOP Number SOP-OTH-F3-0004 concerning Waste Management, Monitoring and Utilization which states that the waste used for

pesticide/herbicide packaging is managed by storing in TPS and handed over to collectors.

- Decree of the Head of Bapedal Number 5 of 1995 and PermenLH Number 14 of 2013 which requires the provision of symbols and labels for all Hazardous waste management activities.
- PermenLHK Number 18 of 2020 concerning the utilization of hazardous and toxic waste.

Root Cause Analysis *(filled by organization audited):*

There is a change of PIC that handle the management of hazardous waste

Correction *(filled by organization audited):*

- Retraining of SOP Number SOP-OTH-F3-0004 to LB3 storage officers who are responsible for LB3 management
-]Removing the used chemical packaging after the announcement was made at the morning apple. (EHP and BLP)
- Handover to hazardous waste shelter and record in the logbook (EHP and BLP)
- Conduct routine patrols on the management of hazardous waste every week assisted by the PIC of each division
- When there is a change of PIC, the jobdesk handover is required to be documented and witnessed by the leadership

Corrective Action *(filled by organization audited):*

The Sustainability Section conducts periodic supervision of the implementation of hazardous waste management through OHS inspection activities.

Assessor Evaluation and Conclusion *(filled by auditor):*

Auditor Verification (4 September 2022):

The company has sent several documents related to corrective actions, including proof of training, minutes of withdrawal of used chemical packaging, as well as proof of handover and the latest logbook. However, based on the results of the verification of root cause analysis, corrective actions and corrective actions, the company has not been able to identify all the root causes in depth. So that the determination of corrective and corrective actions is irrelevant, not right on target and not comprehensive. Based on this, the non-conformance cannot be fulfilled.

Auditor Verification (8 September 2022):

The company has sent several documents related to corrective actions, including proof of training, minutes of withdrawal of used chemical packaging, as well as proof of handover and the latest logbook. The company has also shown evidence of other corrective actions such as proof of installing symbols and labels, proof of submitting B3 waste from various sources, proof of socialization to officers and employees, as well as proof of circular letter Number 022/STT-KALTENG 1/SE/VI/2022 which emphasized the prohibition on the reuse of used chemical packaging. However, the company has not been able to demonstrate comprehensively regarding the corrective activities to be carried out. Based on this, the discrepancy has been met by observation.

Verified by

: **Arief Tajalli**

3.4.4. Opportunity for Improvement

No	Ref. Std.	Description
1	2.1.1	<p>The unit of certification complies with all relevant laws and regulations.</p> <p>Based on the results of the review of the Surface Water Intake and Utilization Permit No. 503/0001/IPAP/DPMPTSP.D dated 27 May 2019 which is valid for 3 years and the Hazardous Waste Storage Permit document No. 660/6/DLH.IV/TPS//IV/2016 dated 12 April 2016 which is valid for 5 years. This indicates that both permits have expired. However, the company can show evidence of processing the extension of the permit document, and until the time the audit is carried out there are still obstacles due to changes in the licensing management mechanism based on Law Number 11 of 2020 regarding Job Creation and Government Regulation Number 22 of 2021 regarding the Implementation of Environmental Protection and Management. Based on this, the company has the opportunity to ensure that the licensing extension process continues, and to document the entire process.</p> <p>Informasi OFI</p>
2	2.3.2	<p>For all FFB obtained indirectly, the unit of certification obtains evidence in accordance with Indicator 2.3.1 from collection centers (collectors), agents, or other intermediaries.</p> <p>Palm Oil Mills (PKS) require the existence of:</p> <ul style="list-style-type: none"> • Information on the geolocation of the FFB origin; • Evidence of ownership status or rights/claims to land by planters/farmers; • Where relevant, a valid planting/operational/trading permit, or as part of a cooperative so that the buying and selling of FFB can be carried out <p>Special Guide If the certification unit has indirect FFB supplying smallholders, then for RSPO certified mills, the time requirement to meet the indicators is three years from 15 November 2018, i.e. 15 November 2021. For uncertified mills/mills in the process of the first year of certification, then the time requirement for supplying smallholders to meet the requirements according to indicator 2.3.1 is three years from the date the mill is certified.</p> <p>Based on the results of the document review, it is known that Bedaun Mill received FFB from 15 third-party collectors. At the time the assessment was carried out, information on the identity of the land owner, geolocation of FFB origin and land ownership status for collectors on behalf of Ponadin and Ede Effendi was shown. Meanwhile, the same information is not yet available for the other 13 collectors. The company representative explained that for other collectors, they are still in the process of identifying and tracing FFB sources and are targeted for completion in 2022. Thus, the company has the opportunity to ensure the identification and traceability process of FFB sources from all FFB suppliers can be carried out in accordance with the stipulated timeline.</p>
3	3.4.3	<p>The social and environmental management and monitoring plan is implemented, monitored and updated periodically in a participatory manner.</p> <p>Based on the verification of documents related to EIA and SIA, the following information was obtained:</p> <ol style="list-style-type: none"> 1. The company has compiled the RKL-RPL document as regulated in the Minister of Environment Decree Number 45 of 2005 concerning Guidelines for the Preparation of the RKL-RPL, but the document has not discussed comprehensively and thoroughly regarding the management and monitoring that has been carried out. 2. The company has managed the SIA which can be proven in the 2021 SIA Realization Report and Management Review document, in the document it has also explained all the programs determined for

No	Ref. Std.	Description
		<p>2021. However, the document has not explained comprehensively and thoroughly related to social issues identified and/or carried out during the program period.</p> <p>Based on this, companies are encouraged to compile more comprehensive RKL-RPL and SIA reports related to all environmental and social management activities.</p>
4	3.5 .1	<p>Procedures for recruitment, selection, acceptance, promotion, retirement and termination of employment are documented and made available to workers and their representatives in accordance with applicable laws and regulations.</p> <p>At the time the audit was carried out, the Company Regulations for the period 2020 - 2022 have expired since March 13, 2022. Meanwhile, the management unit can show a statement letter on the draft of the Company Regulations for the period 2022 - 2024 accompanied by evidence that is still in the process of being ratified by the relevant agency. Thus, the company has the opportunity to ensure that the Company Regulations for the 2022-2024 period have been ratified by the relevant agencies.</p>
5	7.7.5	<p>Drainability assessments are carried out on plantations planted on peatlands following the RSPO Drainability Assessment Procedure, or other RSPO approved method, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) prior to replanting. The results of the assessment are used to determine the time period for replanting to be carried out, as well as to gradually replace oil palm cultivation at least 40 years or two cycles, (whichever is longer), before reaching the natural gravity drainability limit for peat. If oil palm is replaced gradually, it is replaced by other commodity crops more suitable for higher groundwater table (paludiculture) or rehabilitated with natural vegetation.</p> <p>Based on the distribution of planting years in peat areas, it is known that the distribution of TT is from 2000 – 2002, 2006 – 2010, and 2012 – 2014. From these planting years, it is known that the planting age in peat areas ranges from 8 – 22 years and the plan for replanting in peat areas will implemented in the next five years starting in 2027.</p> <p>In accordance with the provisions in the RSPO Drainability Assessment Procedure, it is stated that at least five years before replanting or for plants in peat areas that are 15 years old, an initial Drainability Assessment is carried out. Thus, the company has the opportunity to ensure that the initial drainability assessment is carried out in accordance with these provisions.</p>
6	7.8.3	<p>PKS liquid waste is managed according to applicable regulations. The quality of the PKS liquid waste that is disposed of, especially BOD (Biochemical Oxygen Demand) is monitored regularly according to applicable regulations.</p> <p>Based on the results of field observations in the Empty Bunch Area, it shows that the company does not have irrigation canals to accommodate leachate water generated from EFB accumulation activities. However, there is no actual potential for leachate contamination to be found in water bodies. Based on this, companies are encouraged to manage liquid waste in the form of leachate at the Empty Bunch Area location to anticipate environmental pollution.</p>
7	7.12.4	<p>HCV and HCS forest after 15 November 2018, peatlands and other conservation areas that have been identified, protected and/or enhanced.</p> <p>Based on the results of field observations in several HCV areas, information was obtained that there are HCV areas that have already planted oil palm, have not been compensated, areas have potential for replanting and areas that have become food plantations. The company can show the Sustainability Policy (2018) document, Statement Letter</p>

No	Ref. Std.	Description
		Number 023/EXT/BP-EHP/VI/2022, as well as SOP for Management and Monitoring of Conservation Areas Number SOP-OTH-F3-012 which generally states that all conservation areas will be maintained and maintained. Based on this, companies are encouraged to ensure that the existence of HCV areas is maintained and/or enhanced through the realization of more specific programs.

3.4.5. Noteworthy Positive Components

No	Description
1	Commitment to implement the principles of sustainable oil palm plantation management.
2	Teamwork and competent human resources in their respective fields.
3	Adequate presentation of documents during the audit process
4	Have got the ISPO certificate
5	Has realized the development of plasma plantations and social responsibility programs to the surrounding community



3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Plantation Office of Kotawaringin Barat District</p> <p>In general, communication and delivery of information between agencies and companies goes well and smoothly.</p> <p>Regarding fire prevention and control, the company already has fire control facilities.</p>	<p>There are no issues that need further verification, all information has been included in the relevant indicators.</p>
<p>Manpower Agency of Kotawaringin Barat District</p> <p>For the past two years, no issues/reports have been submitted to the Manpower Office related to industrial relations issues. The composition of employees in the company is permanent and daily worker</p> <p>The company has routinely conducted reports related to employment such as <i>WLTK</i> and <i>PKWT</i> agreement</p> <p>The source person did not know with certainty information regarding work accidents or compliance with involving employees in the <i>BPJS Kesehatan</i> and <i>BPJS Ketenagakerjaan</i> programs because the authority of the labor inspectors located in the Province. However, to the knowledge of the source person, so far the company has complied with the participation of <i>BPJS Ketenagakerjaan</i> and <i>BPJS Kesehatan</i>.</p>	<p>Based on the results of document review and interviews with representatives of trade unions, it is known that so far there have never been any problems related to industrial relations.</p> <p><i>WLTK</i> has been reported in accordance with the timetable as described in the report, while based on the results of the document review, it is known that the workforce in the company is daily worker. The recording of daily worker work agreements has been nonconformity in relate indicator</p> <p>Based on the document review, it is known that employees have been included in the <i>BPJS Kesehatan</i> and <i>BPJS Ketenagakerjaan</i> programs. For <i>BPJS Kesehatan</i>, there are employees with <i>PBI</i> status</p>
<p>Environmental Services of Kotawaringin Barat District</p> <p>In general, communication and delivery of information between agencies and companies goes well and smoothly.</p> <p>Regarding reports that must be sent regularly and the absence of environmental pollution issues</p>	<p>There are no issues that need further verification, all information has been included in the relevant indicators.</p>
<p>National Land Agency of Kotawaringin Barat</p>	<p>Until the audit activity is completed, there is no confirmation from agency regarding the willingness/unavailability as a resource person for public consultation</p>
<p>Gender Committee</p> <p>The company supports the activities of the Gender Committee, which is shown by providing facilities to carry out activities such as socialization and training. Routine activities carried out include socializing procedures for handling sexual harassment and handling domestic violence, <i>posyandu</i>, family planning, and socialization on reproductive health.</p> <p>The targets of the gender committee's activities are female workers, including employees' wives. There was once an empowerment program for employees' wives, namely making bags but it didn't go well due to lack of interest.</p>	<p>Overall there are no negative issues that require further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>For now, the gender committee is handling issues related to women, but it is possible that if there is an issue of harassment or domestic violence that is received by men, this will also be handled and facilitated.</p> <p>During the last two years there have been no issues or reports of sexual harassment in the workplace or domestic violence issues.</p>	
<p>Labor Union of Bedaun Mill</p> <p>So far, the company supports union activities and has never intervened or intimidated. All employees have been included in BPJS Health and BPJS Employment</p> <p>There has been a delay in paying BPJS Ketenagakerjaan premi but it has been resolved properly. The wage used is the 2022 UMK and up to the time the wage has been implemented it has been implemented properly. Excess working hours are paid with an overtime system in accordance with the provisions of the regulations.</p> <p>Employment regulations include the Company Regulations which have been agreed upon by representatives of employers and representatives of workers.</p>	<p>Overall there are no negative issues that require further verification</p>
<p>Bipartite Cooperation Institutes - PT BLP</p> <ul style="list-style-type: none"> The company recognizes the existence of a labor union in the company and there is no intervention in the implementation of any activities. There are no negative reports from workers related to industrial relations. 	<p>In general, it can be concluded that there are no negative issues related to industrial relations within the scope of the company.</p>
<p>Employee Cooperative</p> <p>The cooperative's line of business is the sale of basic necessities. Cooperative activities are supported, for example, by providing a special place by the company.</p> <p>All employees, whether permanent employees or daily workers, are allowed to shop at the Cooperative. Information regarding the RAT, the number of cooperative members and the mandatory/principal fees were not known by the resource person</p>	<p>Overall there are no negative issues that require further verification</p>
<p>Bedaun Maju Bersama Cooperative</p> <p>So far, the cooperative relationship between the cooperative and the company has been going well. Plasma management is carried out transparently with good coordination</p> <p>The plasma development has been realized 100% covering an area of 1,863.41 Ha. Of this area, 607 hectares have been paid off by the bank, while another 1,256 hectares are still in debt. The number of members is 1,434 people.</p>	<p>Overall, there were no negative issues raised from the results of the public consultation. The verification of plasma FFB payments has been described in the related indicators.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Payment of plasma FFB results is divided equally among all members. The company provides cost and profit reports as the basis for the distribution of SHU. The price of FFB is as determined by the Plantation Service</p>	
<p>Kumai Hulu Sebrang Cooperative</p> <p>Cooperation between companies and cooperatives is going well, especially with regard to transparency regarding fees and distribution of SHU. The cooperative is in debt with the bank until March 2031.</p> <p>The realization of plasma plantation development is not yet 100%. In the MoU it is planned to build 864 hectares and so far 384 hectares have been realized with a total of 399 land owners.</p> <p>So far, communication between the company and the cooperative is good and currently the cooperative is managed in a fully managed manner. SHU will be divided equally among all land owners.</p>	<p>The realization of plasma plantation development cannot be done 100% because the land that was originally allocated for plasma is in the HPK area and river border. As stated in the Cooperation Agreement for plasma development, it is stated that the provision of land for plasma development is done by the community</p>
<p>Sungai Bedaun Village</p> <p>The positive impacts of the existence of the company include opening up access for the community and increasing living standards through employment opportunities and the development of plasma plantations.</p> <p>The company routinely provides socialization about the dangers of forest and land fires, the prohibition of hunting for wild and protected animals, including preserving the environment and conservation areas</p> <p>The form of the company's attention to the surrounding community is manifested in the CSR program and so far the CSR provided has been in line with the needs of the village because every year company representatives regularly participate in the MUSRENBANGDES.</p> <p>In late 2021, an orangutan entered the village area. The company responded quickly by coordinating with the BKSDA to evacuate the orangutan</p> <p>During the last two years there has never been an issue of land disputes and environmental pollution</p>	<p>Overall, there were no negative issues raised from the results of the public consultation whom need further verification</p>
<p>Sungai Bedaun Village Community Leader – Ex Village Secretary in year 2000</p> <p>The history of the plantation development started from 1995 - 1996. The company involved the community and community leaders including the government in conducting socialization for the development of the plantation. There is no coercion in</p>	<p>Overall there are no negative issues that require further verification</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>relinquishing land ownership even though legally the community does not actually have an official document. However, with the consideration that the community has made efforts, GRTT is carried out according to the agreement</p> <p>The existence of the company has a positive impact, for example by opening up employment opportunities and developing plasma so as to improve the standard of living of the community. The company also provides opportunities in partnerships with local contractors, for example for FFB transportation and EFB transportation.</p> <p>So far, they have never known the issue of land disputes. Even if it is possible that the litigants are not the original land owners but the heirs or their descendants.</p>	
<p>Previous Land Owner Haji Basir dan Abdul Muis</p> <p>The land acquisition process was carried out from 1998 – 2015 and had been previously socialized. People who own land (shifting cultivation) who have cultivated the land and are not left abandoned for at least 1 year are entitled to <i>GRTT</i>.</p> <p>The process of land release was preceded by socialization, negotiation and then compensation was carried out which was witnessed and known by the parties such as representatives of land owners, representatives of village governments, to representatives of sub-districts.</p>	<p>Overall there are no negative issues that require further verification. The land acquisition process has been carried out using the FPIC method, for example, it was preceded by socialization to the negotiation stage. No intimidation in land acquisition</p>
<p>Sekonyer Village</p>	<p>Until the audit activity was completed, the village representative could not be contacted due to problems with signals</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p style="text-align: center;">Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Eagle High Plantation Management Representative</p>  <p>Andra Tetuko Thursday, 08 September 2022</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Haikal Ramadhan Kharismansyah</u> Thursday, 08 September 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	Kotawaringin Barat District	-	Phone	9 June 2022	✓	
2	Environmental Agency	Kotawaringin Barat District	-	Phone	9 June 2022	✓	
3	Manpower Agency	Kotawaringin Barat District	-	Phone	9 June 2022	✓	
4	National Land Agency	Kotawaringin Barat District	-	Phone	9 June 2022		✓
5	Gender Committee	PT EHP	-	Phone	7 June 2022	✓	
6	Labor Union of Bedaun Mill	PT EHP	-	Phone	7 June 2022	✓	
7	Employee Cooperative	PT EHP	-	Phone	9 June 2022	✓	
8	Bedaun Maju Bersama Cooperative	PT EHP	-	Phone	7 June 2022	✓	
9	Bipartit of PT BLP	PT BLP	-	Direct Interview	9 June 2022	✓	
10	Kumai Hulu Sebrang Cooperative and Previous Land Owner	PT EHP	-	Phone	9 June 2022	✓	
11	Village Official of Sungai Bedaun	District of Kumai, Kotawaringin Barat	-	Direct Interview	7 June 2022	✓	
12	Village Official of Sungai Bedaun - Ex Village Secretary in year 2000	District of Kumai, Kotawaringin Barat	-	Direct Interview	7 June 2022	✓	
13	Previous Land Owner Haji Basir dan Abdul Muis	District of Kumai, Kotawaringin Barat	-	Direct Interview	7 June 2022	✓	
14	Sekonyer Village	District of Kumai, Kotawaringin Barat	-	Phone	9 June 2022		✓
15	WALHI	Jakarta	informasi@walhi.or.id	Questionnaire via email	31 May 2022		✓
16	IARI	Jakarta	informasi@internationalanimalrescue.org	Questionnaire via email	31 May 2022		✓
17	AMAN	Jakarta	rumahaman@cbn.net.id	Questionnaire via email	31 May 2022		✓
18	Sawit Watch	Jakarta	info@sawitwatch.or.id	Questionnaire via email	31 May 2022		✓
19	EHP POM - 1 WTP operators. - 1 land application operators. - Security Post : 2 Worker - Weighbridge Operator : 1	PT EHP	-	Direct Interview	7 June 2022	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
	<ul style="list-style-type: none"> worker - Sterilizer Station: 2 Operator - Press Station : 2 Operator - Kernel Station : 2 Operator - Engine Room : 2 Operator - Boiler : 1 operator - Grading Station : 5 worker 						
20	Arjuna Estate <ul style="list-style-type: none"> - Harvesting : 3 worker and 1 supervisor - Spraying Team : 5 worker and 1 supervisor - Fertilizer team 4 workers and 1 supervisor - Bachoe Loader Operator : 1 workers. - Spreader Operator : 1 workers. - 1 land application operators. 	PT Bumi Langgeng Perdanatrada	-	Field observation and direct interview	7 June 2022	✓	
21	Bromo Estate <ul style="list-style-type: none"> - Harvesting 5 workers and 1 supervisor - Spraying Team : 6 worker and 1 supervisor - Daycare : 1 persons - Generator room: 1 operator. - Housing complex 1 resident. - Generator room: 1 operator. - Storage official 1 person. 	PT Bumi Langgeng Perdanatrada	-	Field observation and direct interview	8 June 2022	✓	
22	Semeru Estate <ul style="list-style-type: none"> - Harvesting 5 workers and 1 supervisor - Manual Up keep : 3 worker - Generator room: 1 operator. - Water pump: 1 operator. 	PT Bumi Langgeng Perdanatrada	-	Field observation and direct interview	8 June 2022		✓

Appendix 2. Assessment Program
ASA 2 REMOTE

DATE	09 – 10 December 2021	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Thursday, 15 July 2021		
08.00 – 08.30	Opening Meeting Preparation	
08.30 – 09.00	Opening meeting (recorded video conference) <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	All Auditor
09.00 – 12.00	<ul style="list-style-type: none"> Document review and completing audit checklist. Verification of Basic Information Mill and Estate Confirmation of Time Bound Plan Review of Partial Certification 	All Auditor
12.00 – 14.00	<ul style="list-style-type: none"> Break 	All Auditor
14.00 – 16.15 16.15 – 17.00	<ul style="list-style-type: none"> Document review and completing audit checklist. Presentation of Daily Progress. 	All Auditor
Friday, 16 July 2021		
08.00 – 11.00	<ul style="list-style-type: none"> Document review and completing audit checklist. 	All Auditor
12.00 – 15.30	Internal discussion by auditor team preparing for Closing Meeting	All Auditor
15.30 – 16.30	Closing Meeting (recorded video conference) <ul style="list-style-type: none"> Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timelie of CAR's, Conclusion)/ Comments, Responses and Questions 	All Auditor

ASA 1-2 & 1-3 ONSITE

DATE	06 – 11 June 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 6 June 2022		
10.00 – 14.25 15.00 – 16.00	Jakarta → Pangkalan Bun Pangkalan Bun → Site	All Auditor
16.00 – 17.00	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). Documnet review Verification of basic information mill and estate 	All Auditor
Tuesday, 7 June 2022		
08.00 – 12.00	Public Consultation <ul style="list-style-type: none"> Government Agencies of Kotawaringin Barat Gender Committee, Contractor, Worker Union, Village Representatif, Previous Land Owner, etc. FFB Supplier, Scheme smallholder 	HRK
08.00 – 12.00	Field Observation to Arjuna Estate Aspect to be verified :	ART/KKF/DRW

DATE	06 – 11 June 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries) and HCV Management Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, IPM, EFB Application, etc). Implementation of Environmental and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Clinic, etc). Implementation of OHS. Implementation of employment procedure and mechanism aspect. Observation of Workers Facilities (Housing, School, Worship, clean water, etc). 	
12.00 – 14.00	Break	All Auditor
14.00 – 16.00	Field Observation to Bedaun Mill <ul style="list-style-type: none"> Supply chain verificaton (FFB receiving, weightbridge, FFB Sorting, Despatch CPO) OHS Aspect (Inspection to chemical storage, hazardous waste storage, POME Pond, Emergency simulation, WWTP, etc). Implementation of employment procedure and mechanism aspect. 	
16.00 – 17.00	Presentation of Dailly Progress	All Auditor
Wednesday, 8 June 2022		
08.00 – 12.00	Field Observation to Semeru and Bromo Estate Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries) and HCV Management Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, IPM, EFB Application, etc). Implementation of Environmental and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Clinic, etc). Implementation of OHS. Implementation of employment procedure and mechanism aspect. Observation of Workers Facilities (Housing, School, Worship, clean water, etc). 	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.00	<ul style="list-style-type: none"> Document review and completing audit checklist Verification of stakeholder consultation result and field visit. 	All Auditor
16.00 – 16.30	Presentation of Dailly Progress	All Auditor
Thursday, 9 June 2022		
08.00 – 12.00	<ul style="list-style-type: none"> Document review and completing audit checklist Continuing public consultation (if needed) Verification of stakeholder consultation result and field visit. 	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.00	<ul style="list-style-type: none"> Document review and completing audit checklist Continuing public consultation (if needed) Verification of stakeholder consultation result and field visit. 	All Auditor
16.00 – 16.30	Presentation of Dailly Progress	All Auditor
Friday, 10 June 2022		
08.00 – 11.30	<ul style="list-style-type: none"> Document review and completing audit checklist Continuing public consultation (if needed) 	All Auditor

DATE	06 – 11 June 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> • Verification of stakeholder consultation result and field visit. 	
11.30 – 14.00	Break	All Auditor
14.00 – 15.00	Internal Meeting Auditor Team	All Auditor
15.00 – 17.00	Closing Meeting	All Auditor
Saturday, 11 June 2022		
08.00 – 09.00	Site → Pangkalan Bun	All Auditor
10.50 – 15.25	Pangkalan Bun → Jakarta	All Auditor