

Roundtable on Sustainable Palm Oil Certification
R S P O

[✓] Surveillance

Name of Management Organisation : **Mulia Oil Mill – PT Sepanjang Intisurya Mulia subsidiary of Genting Plantations**

Plantation Name : **PT Sepanjang Intisurya Mulia: Mulia 1-2 Estate, Mulia 3-4 Estate, Mulia 5-6 Estate; Koperasi Sawit Trimulya Lestari (406 members); Koperasi Sawit Harapan Jaya (700 members) PT Sawit Mitra Abadi: Sawit Mitra Abadi 1-2 Estate, Sawit Mitra Abadi 3-4 Estate; Koperasi Jasa Panca Mitra Abadi (597 members)**

Location : **Pangkalan Teluk Village, Sub – District of Nanga Tayap, District of Ketapang, Province of Kalimantan Barat, Indonesia**

Certificate Code : **MUTU-RSPO/119**

Date of Certificate Issue : 10 August 2018 Date of License Issue : 10 November 2022

Date of Certificate Expiry : 09 August 2023 Date of License Expiry : 09 August 2023

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-3 (Remote)	23 to 24 August 2021	Ardiansyah (Lead Auditor), Dwi Haryati, Asystasya Aishah Silalahi, Sentot Adi Subandono	Hasiholan Sihombing	Leonada
ASA-3 & ASA-4 (Onsite)	25 to 28 July 2022	Moh Arif Yusni, Yudhi Yuniarto T, Radytio Puspanjana, and Harry Wahyudi		

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-3 & ASA-4	01 November 2022

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Figure 1. Location Map of PT Sepanjang Intisurya Mulia

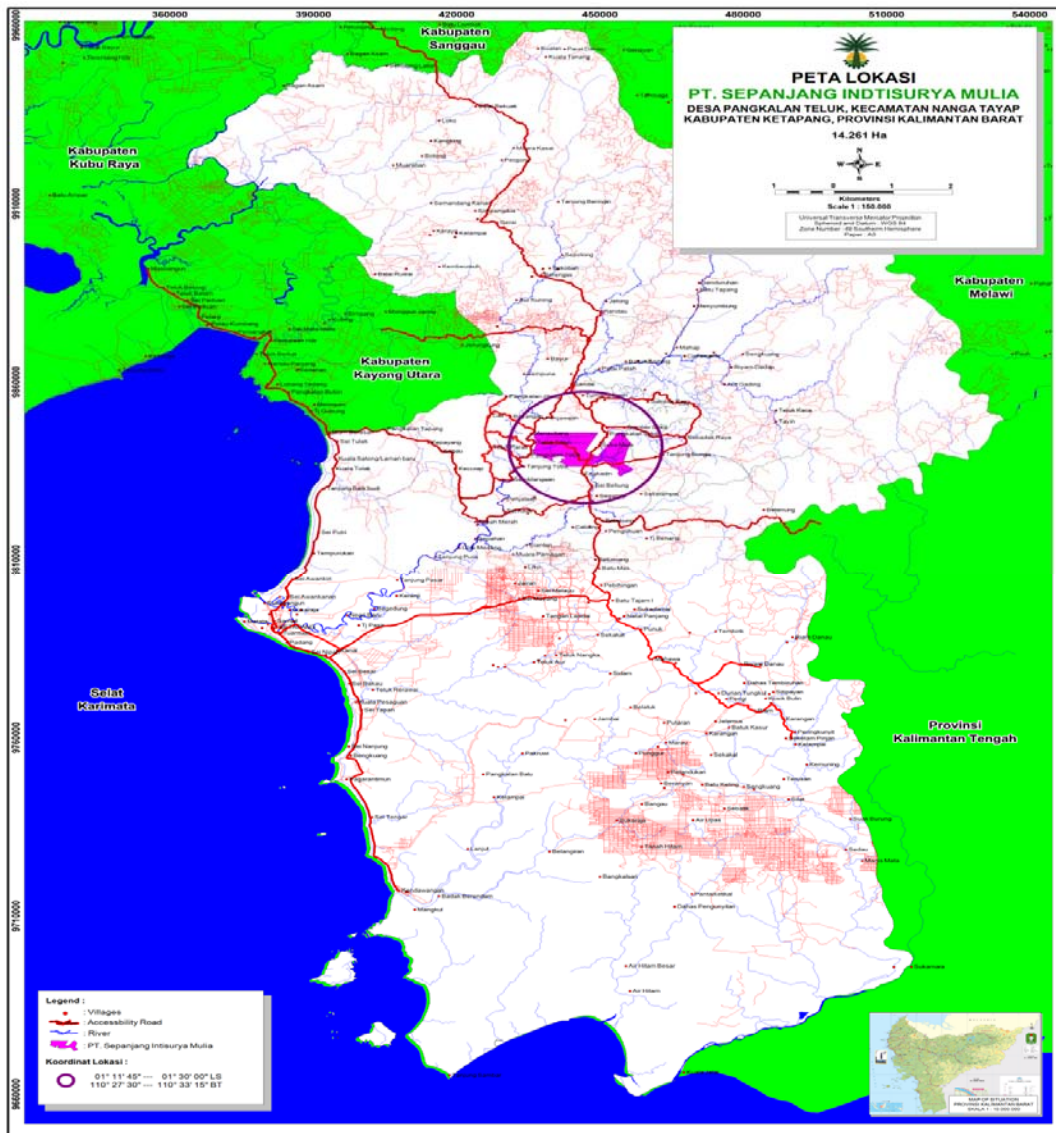


Figure 2. Location Map of PT Sawit Mitra Abadi

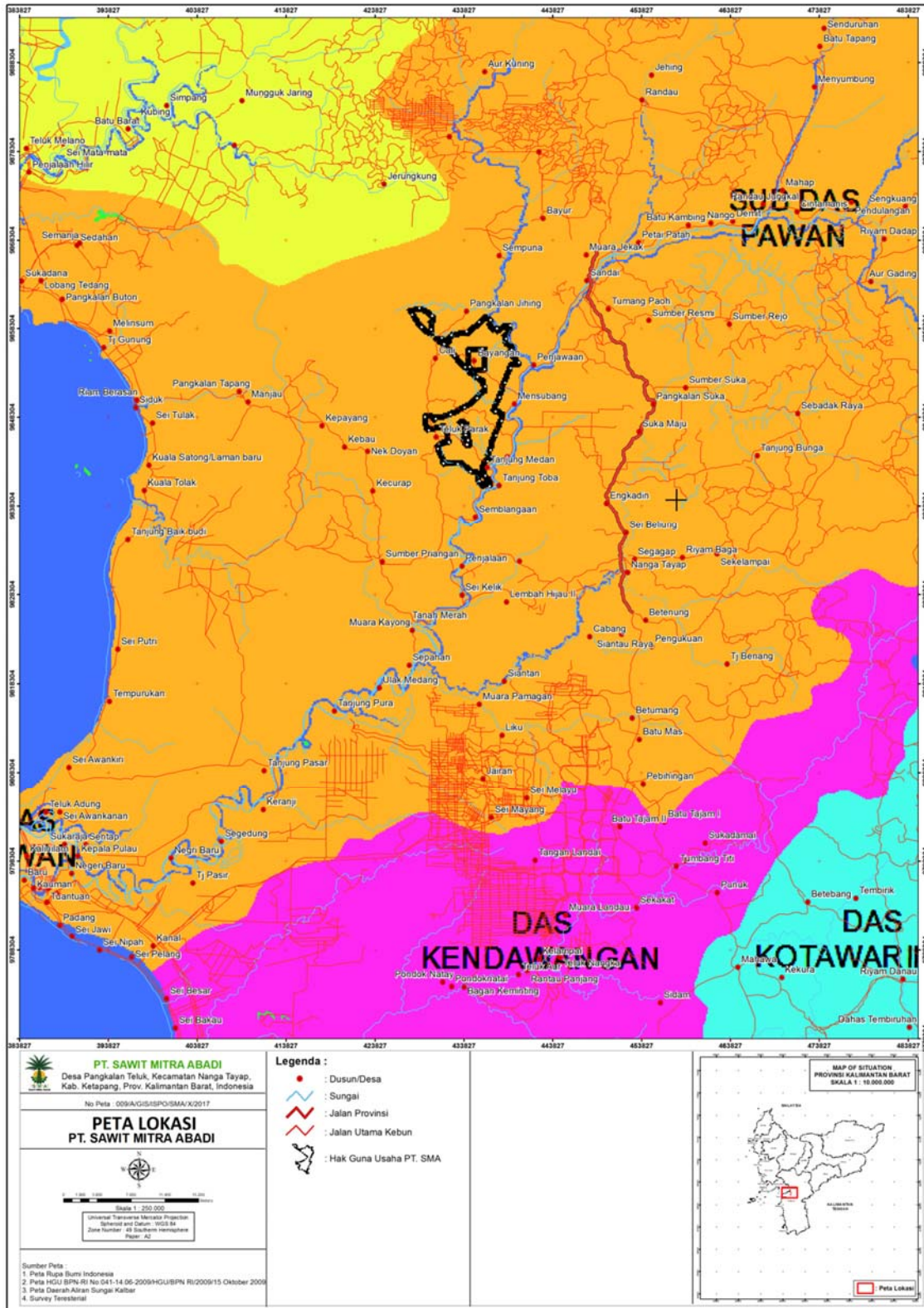


Figure 3. Operational Map of PT Sepanjang Intisurya Mulia

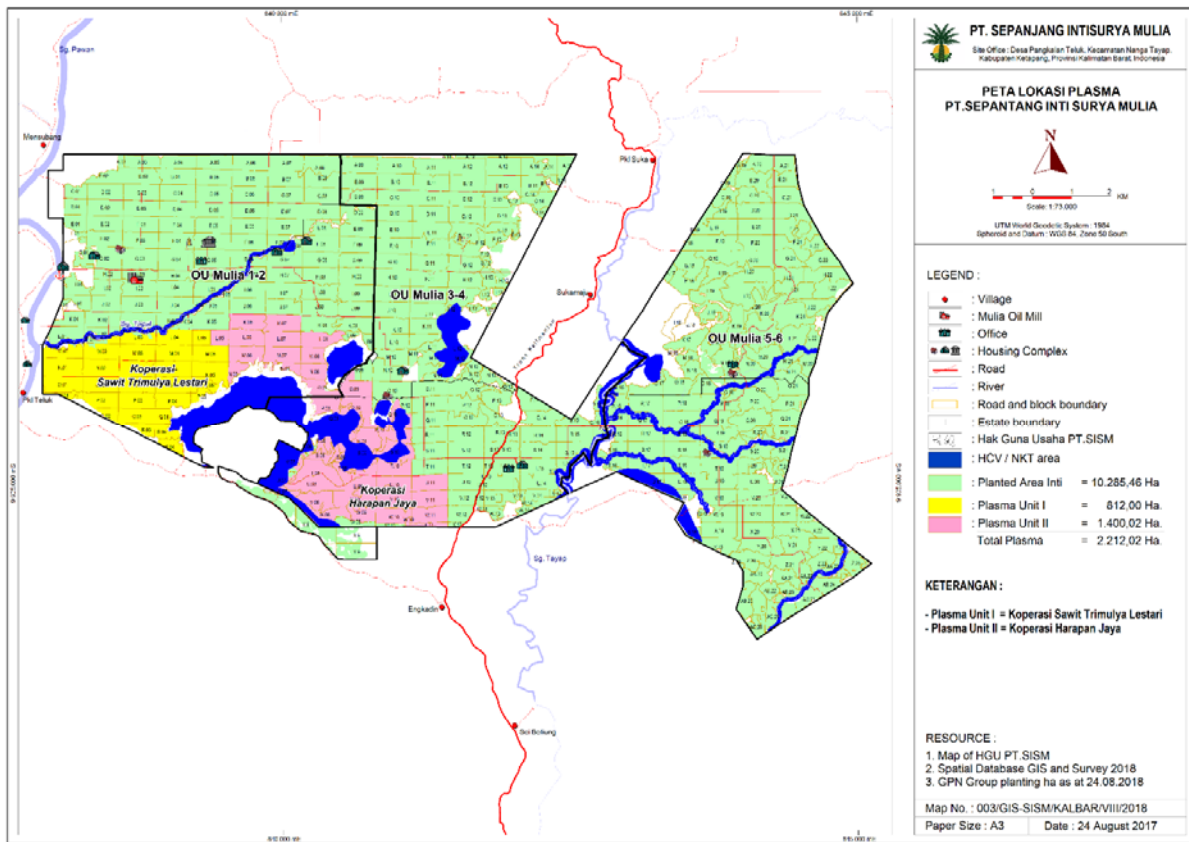
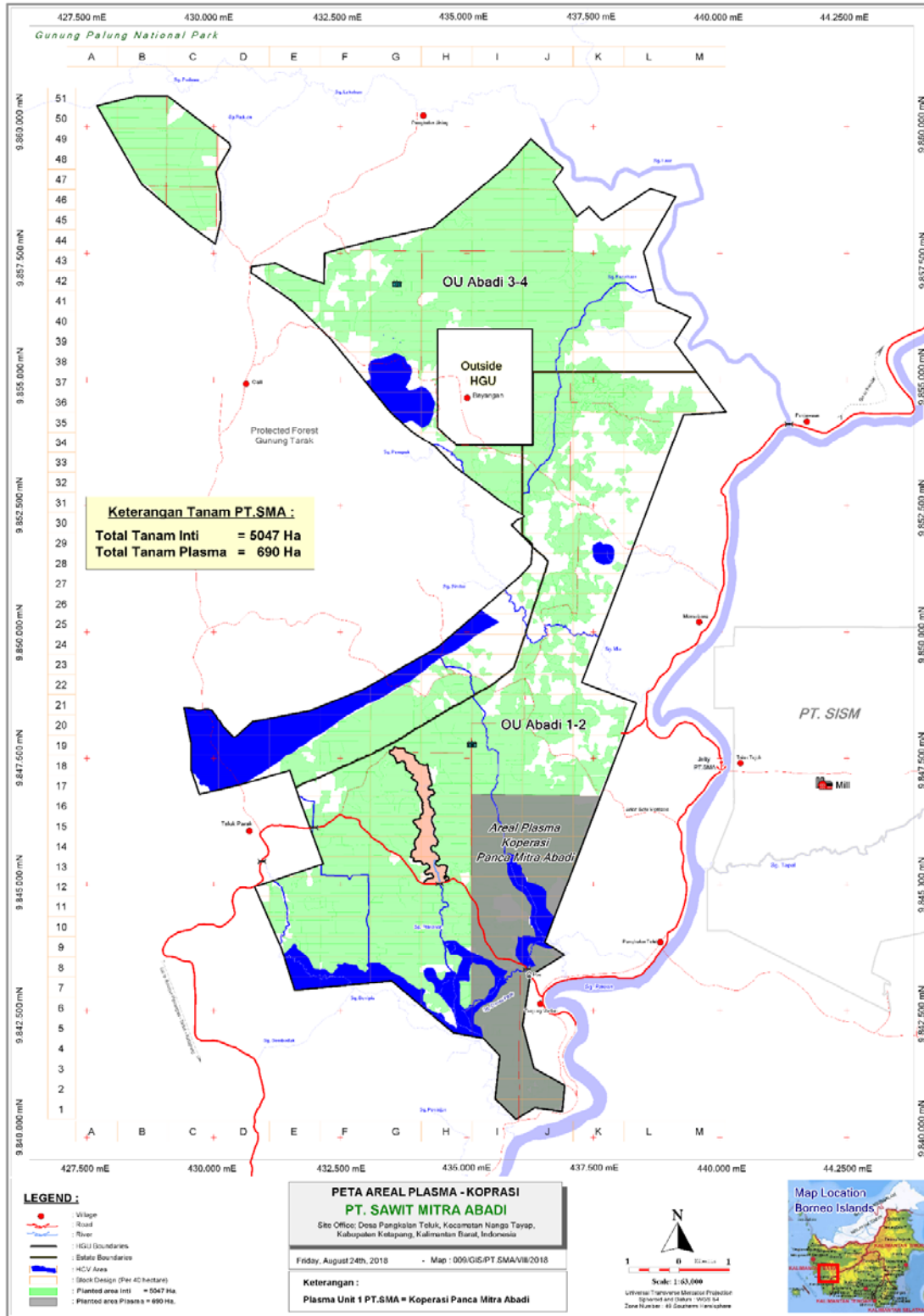


Figure 4. Operational Map of PT Sawit Mitra Abadi



Abbreviations Used

AMDAL	:	<i>Analisis Mengenai Dampak Lingkungan</i> / Environmental impact analysis
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Insurance)
B3	:	Hazardous Material
BOD	:	Biological Oxygen Demand
BPD	:	<i>Badan Permusyawaratan Desa</i> /Village Deliberation Agency
CH	:	Certificate Holder
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CPO	:	Crude Palm Oil
ENV	:	Enivironmental
FFB	:	Fresh Fruit Bunch
GHG	:	Green House Gases
GP	:	Genting Plantation
HCV	:	High Conservation Value
HIRADC	:	Hazard Identification Risk Assesment and Determining Control
HR	:	Human Resource
IOM	:	Internal Memorandum
KER	:	Kernel Extraction Rate
KHL	:	<i>Karyawan Harian Lepas</i> /Casual Worker
KHT	:	<i>Karyawan Harian Tetap</i> /Permanent Workers
LOTO	:	Lock Out Tag Out
LUCA	:	Land Use Change Analysis
MasL	:	Meter above sea levels
MB	:	Mass Balance
MOM	:	Mulia Oil Mill
MT	:	Metrics Tons
Musrebang	:	<i>Musyawaharah Rencana Pembangunan</i> / Regional development planning meetings
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
OHSE	:	Occupational Health Safety and Environment
OU	:	Operation Unit
<i>P2K3</i>	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> /OHS Committee
PIC	:	Person in Charge
PK	:	Palm Kernel
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
P&C	:	Principle & Criteria
RKL/RPL	:	<i>Rencana Kelola Lingkungan/Rencana Pemantauan Lingkungan</i> (Environmental Management and Monitoring Plan)
SCCS	:	Supply Chain Certification Standard
SISM	:	Sepanjang Intisurya Mulia
SIA	:	Social Impact Assessment
SMA	:	Sawit Mitra Abadi
SMD	:	Microsoft Dynamic System
SOP	:	Standard Operating Procedures
RSPO	:	Roundtable on Sustainable Palm Oil
WWTP	:	Waste Water Treatment Process
	:	

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020. RSPO Certification System for Principles and Criteria, November 2020 	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT SEPANJANG INTISURYA MULIA	
1.2.2	Contact person	Dr. Faizal Amri Amran (Head of Sustainability Genting Plantation Indonesia)	
1.2.3	Organisation address and site address	<p>Head Office 10th Floor, Wisma Genting, Jalan Sultan Ismail Kuala Lumpur 50250 24th Floor, Wisma Genting, Jalan Sultan Ismail, Kuala Lumpur 50250, Malaysia</p> <p>Liaison Office Jl. Jendral Sudirman Kav. 52-53, Jakarta 12910</p>	
1.2.4	Telephone	<p>Malaysian Head Office: Tel: (603) 2178 2288 (603) 2333 2288 Fax: (603) 2161 5304</p> <p>Indonesian Liaison Office: 0534-303 6320/21</p>	
1.2.5	Fax	(603) 2161 5304	
1.2.6	E-mail	faizal.amri@genting.com	
1.2.7	Web page address	www.gentingplantations.com	
1.2.8	Management Representative who completed the application for certification	Dr. Faizal Amri Amran (Head of Sustainability Genting Plantation Indonesia)	
1.2.9	Registered as RSPO member	1-0086-06-000-00, dated 14 November 2006	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Mulia Mill supplied by PT Sepanjang Intisurya Mulia or PT SISM (Mulia 1-2 Estate, Mulia 3-4 Estate, Mulia 5-6 Estate) and PT Sawit Mitra Abadi or PT SMA (Sawit Mitra Abadi 1-2 Estate, Sawit Mitra Abadi 3-4 Estate).	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude

	Mulia Oil Mill	Pangkalan Teluk Village, Sub-District of Nanga Tayap, District of Ketapang, Province of Kalimantan Barat, Indonesia	S 01° 22' 58"	E 110° 28' 37"		
1.4.2	Location of Certification Scope of Supply Base					
	Name of Supply Base	Location	Coordinate			
			Latitude	Longitude		
	PT Sepanjang Intisurya Mulia (PT SISM)					
	Mulia 1-2 Estate	Village of Pangkalan Teluk and Mensubang, Sub-District of Nanga Tayap, District of Ketapang, Province of Kalimantan Barat, Indonesia	S 01° 22' 52"	E 110° 30' 52"		
	Koperasi Sawit Trimulya Lestari (406 members)					
	Mulia 3-4 Estate	Village of Sepakat Jaya, Sub-District of Nanga Tayap, District of Ketapang, Province of Kalimantan Barat, Indonesia	S 01° 25' 35"	E 110° 33' 49"		
	Koperasi Sawit Harapan Jaya (700 members)					
	Mulia 5-6 Estate	Village of Sepakat Jaya, Sub-District of Nanga Tayap, District of Ketapang, Province of Kalimantan Barat, Indonesia	S 01° 24' 17"	E 110° 36' 59"		
	PT Sawt Mitra Abadi (PT SMA)					
	Abadi 1-2 Estate	Pangkalan Teluk and Mensubang Village, Sub-District of Nanga Tayap, District of Ketapang, Province of Kalimantan Barat, Indonesia	S 01° 22' 38"	E 110° 24' 56"		
	Koperasi Jasa Panca Mitra Abadi (597 members)					
	Abadi 3-4 Estate	Pangkalan Teluk and Mensubang Village, Sub-District of Nanga Tayap, District of Ketapang, Province of Kalimantan Barat, Indonesia	S 01° 17' 40"	E 110° 24' 14"		
1.5	Description of Area Statement					
1.5.1	Tenure					
	• State			22,635.39 Ha		
	• Community			- Ha		
1.5.2	Area Statement					
		PT Sepanjang Intisurya Mulia		PT Sawit Mitra Abdi		Total
		Own Estate	Scheme Smallholders	Own Estate	Scheme Smallholders	
	• Total area	12,049.24	2,212.02	7,684.13	690.00	22,635.39
	• Mature area	9,522.91	2,212.02	5,734.31	690.00	18,159.24
	• Mill	38.40	-	-	-	38.40
	• Infrastructure (Road, Bridge and Ditch)	743.78		352.58	-	1,096.36
	• HCV	1,233.13	-	857.50	-	2,090.63
	• Occupation	511.02	-	739.74	-	1,250.76
1.6	Planting Year and Cycles					

1.6.1	Age profile of planting year									
	Planting Year	Hectarage (Ha)								
		Mulia 1-2 Estate	Plasma 1 (STL)	Mulia 3-4 Estate	Plasma 2 (HJ)	Mulia 5-6 Estate	Abadi 1-2 Estate	Plasma (PMA)	Abadi 3 Estate	Total
	2007	1,839.39	19.5	-	19.17	-	-	-	-	1,878.06
	2008	848.63	788.8	1,318.03	1,056.13	-	-	-	-	4,011.59
	2009	14.57	3.7	1,301.59	231.72	2,771.59	756.00	187.71	-	5,266.88
	2010	-	-	267.8	-	726.55	522.00	227.93	-	1,744.28
	2011	57.99	-	19.9	-	-	864.00	217.53	-	1,159.42
	2012	-	-	-	-	-	411.00	40.40	275.00	726.40
	2013	-	-	11.22	93.00	37.23	652.38	16.43	525.57	1,335.83
	2014	-	-	82.95	-	-	54.69	-	1,069.62	1,207.26
	2016	15.57	-	152.25	-	57.65	56.84	-	547.21	829.52
	TOTAL	2,776.15	812.00	3,153.74	1,400.02	3,593.02	3,316.91	690.00	2,417.40	18,159.24
1.6.2	New Planting area after January 2010				7,002.71 ha					
1.6.3	Planting Cycle				1 st Cycle					
1.7	Description of Mill and Supply Base									
1.7.1	Description of Mill									
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel				
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)			
	Mulia Oil Mill	90	553,903.70	124,443.49	22.47	20,670.18	3.73			
	<i>*Production data source from last onsite assessment (November 2020 – June 2022)</i>									
1.7.2	Description of Certification Scope of Supply Base									
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)	Supplied to Mill				
						FFB (tonnes/year)	%			
	Mulia 1-2 Estate	3,741.64	2,776.15	96,430.83	20.84	96,430.83	100			
	Koperasi Sawit Trimulya Lestari	812.00	812.00	18,950.02	14.00	18,950.02	100			
	Mulia 3-4 Estate	3,899.08	3,153.74	89,199.08	16.97	89,199.08	100			
	Koperasi Sawit Harapan Jaya	1,400.02	1,400.02	25,828.29	11.07	25,828.29	100			
	Mulia 5-6 Estate	4,308.53	3,593.02	113,187.49	18.90	113,187.49	100			
	Abadi 1-2 Estate	4,225.51	3,316.91	43,130.66	7.80	43,130.66	100			
	Koperasi Jasa Panca Mitra Abadi	690.00	690.00	14,582.37	12.68	14,582.37	100			
	Abadi 3 Estate	3,458.62	2,417.40	52,453.92	13.02	52,453.92	100			
	TOTAL	22,635.40	18,159.24	456,762.66	15.09	453,762.66	100			
	<i>*Production data source from last onsite assessment (November 2020 – June 2022)</i>									
	<i>*the yield calculation are FFB produced / production area / 20 (period o FFB produced (November 2020 – June 2022) x 12</i>									

1.7.3	FFB description from other source				
	Name of sources/Organisation (RSPO certified / non-certified)	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill FFB (tonnes/year)
	PT. Surya Agro Palma (Non-certified)	Associated outgrower - Genting Plantations Group		6,825.85	7,072.15
	PT. Surya Agro Palma Plasma (Non-certified)	Genting Plantations Group	783	1,681.22	1,188.64
	PT. Citra Sawit Cemerlang (Non-Certified)	Associated outgrower - Genting Plantations Group		4,724.99	73,985.45
	PT. Citra Sawit Cemerlang Plasma (Non-certified)	Genting Plantations Group	344	901.27	10,350.42
	PT. Agro Abadi Cemerlang (Non-certified)	Associated outgrower - Genting Plantations Group		3,546.88	6,467.38
	PT. Agro Abadi Cemerlang Plasma (Non-certified)	Genting Plantations Group	643	1,029.35	720.73
	TOTAL				99,784.77
	<i>*Production data source from last onsite assessment (November 2020 – June 2022)</i>				
1.7.4	Product categories		FFB, CPO, PK		
1.8	Tonnage of Product				
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT)	Last Year Actual Certified Volume (November 2020 – June 2022) (MT)	
	FFB Processed		528,763	456,762.66	
	CPO Production		120,127	103,247.02	
	Palm Kernel (PK) Production		19,941	17,303.56	
	<i>CSPO and CSPK production is added by opening stock from July 2021</i>				
1.8.2	Product selling				
	Type of selling product		Actual selling product for last year (November 2020 – June 2022) (MT)		
	CSPO sold as RSPO certified product		59,500.33		
	CSPK sold as RSPO certified product		7,608.12		
	CSPO sold under other scheme		0		
	CSPK sold under other scheme		0		
	CSPO sold as conventional		39,619.99		
	CSPK sold as conventional		9,615.74		
1.8.3	Estimate of Certified FFB Claim				
	Name of Estates	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)
	Mulia 1-2 Estate	3,841.64	2,776.15	60,000	21.61
	Koperasi Sawit Trimulya Lestari	812.00	812.00	12,000	14.78
	Mulia 3-4 Estate	3,899.08	3,153.74	54,000	17.12
	Koperasi Sawit Harapan Jaya	1,400.02	1,400.02	17,000	12.14
	Mulia 5-6 Estate	4,308.53	3,593.02	72,000	20.04

	Abadi 1-2 Estate	4,225.51	3,316.91	28,000	8.44			
	Koperasi Jasa Panca Mitra Abadi	690.00	690.00	9,000	13.04			
	Abadi 3 Estate	3,458.62	2,417.40	36,000	14.89			
	TOTAL	22,635.39	18,159.24	288,000	15.86			
<i>*Projected FFB production for 12 months of certificate</i>								
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	Mulia Oil Mill	90	288,000	65,520	22.75	10,800	3.75	MB
<i>*Projected CSPO and CSPK production for 12 months of certificate</i>								
1.9	Other Certifications							
	ISO 9001:2015			-				
	ISO 14001: 2015			-				
	ISO 45001:2018			-				
	ISCC			-				
	Others			ISPO PT SISM : SPO.21004.TSI valid until 07 March 2026 ISPO PT SMA : FMS40097 valid Until 04 December 2023				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	Mill	Time Bound Plan						
	Genting Ayer Item Oil Mill, Johor, Malaysia	2014	Genting Sri Gading Estate	Dec 2014	Johor, Malaysia	Certified		
			Genting Sungei Rayat Estate	Dec 2014				
			Genting Kulai Besar Estate	Dec 2014				
			Genting Tanah Merah Estate	Dec 2015				
		Genting Tebong Estate	2015	Johor, Malaysia	Certified			
		Genting Selama Estate	2019	Kedah, Malaysia	Certified			
	Genting Sabapalm Oil Mill	2015	Genting Sabapalm Estate	Aug 2015	Sabah, Malaysia	Certified		
	Genting Tanjung Oil Mill	2016	Genting Tanjung Estate	Aug 2016	Sabah, Malaysia	Certified		
			Genting Tenegang Estate					
			Genting Layang Estate					
			Genting Bahagia Estate					
		Genting Landworthy Estate						
	Genting Indah Oil Mill	2022	Genting Indah Estate	2022	Sabah, Malaysia			
			Genting Permai Estate					

		Genting Kencana Estate			RACP plan is approved on 4 th April 2022
Genting Jambongan Oil Mill	2019	Genting Jambongan Estate	Sep 2019	Sabah, Malaysia	Certified
Genting Trushidup Oil Mill	2017	Genting Sekong Estate	2017	Sabah, Malaysia	Certified
		Genting Suan Lamba Estate			
Mulia Oil Mill	2017	Mulia Estate 1	2017	Kalimantan, Indonesia	Certified
		Mulia Estate 2			
		Mulia Estate 3			
		Mulia Estate 4			
		Mulia Estate 5			
		Mulia Estate 6			
		PT SMA Estate 1			
		PT SMA Estate 2			
		PT SMA Estate 3			
PT SMA Estate 4					
Genting Mewah Oil Mill	2017	Genting Mewah Estate	2017	Sabah, Malaysia	Certified
	2017	Genting Bukit Sembilan Estate	2017	Kedah Malaysia	Certified
Globalindo Oil Mill	2022	Lamunti Barat Estate 1	2022	Kalimantan, Indonesia	ST-1 Audit
		Lamunti Timur Estate I			
		Mengkatip Estate			
		Bakuta Estate 1	2023		NPP for PT UAI in progress. HCV report being reviewed by HCVRN. In the process of obtaining HGU for UAI.
		Plasma Timur & Barat			
		PT UAI 1 & 2	2023		
UAI Plasma	2023				
KMH Oil Mill	2023	Waterfall Estate I & II	2023	Kalimantan, Indonesia	In the process of obtaining Forest Release and Forest Exchange prior to HGU application
		Muhun Estate I & II	2023		
		Talawang Estate I & II	2023		
		KMJ Plasma	2023		
Golden Hill Oil Mill	2023	Puroh Estate	2023	Kalimantan, Indonesia	In the process of obtaining Forest Release and Forest Exchange prior to HGU application
		Masaha Estate			
		Zircon Hill Estate			
		SP Plasma	2023		
		Golden Hill Estate I	2023		
		Golden Hill Estate II			
Diamond Hill Estate					

		DWK Plasma	2023		
Citra Sawit Cemerlang Oil Mill*	2023	CSC Estate	2023	Kalimantan , Indonesia	In process of obtaining HGU HCSA report completed review
Cemerlang Oil Mill	2022	SAP Estate 1 & 2	2023		In process of obtaining HGU
		SAP Estate 3 & 4			
		SAP Estate 5 & 6			
		Plasma SAP			
	2022	AAC 1 & 2	2022		NPP in progress. HCV being reviewed by HCVRN.
		AAC 3 & 4			HCSA report under review by HCSA.
Palma Agro Lestari Jaya Oil Mill*	2023	PALJ Estate	2023	Kalimantan , Indonesia	In process of obtaining HGU. HCSA report completed review
		PALJ Plasma			
KIU Oil Mill	2022	KIU 1 & 2	2022	Kalimantan , Indonesia	NPP in progress. HCV report being reviewed by HCVRN. HCSA report to be reviewed by HCSA.
		KIU 3 & 4			
		KIU Plasma	2022		
<p>Time Bound Plan updated on May 2022 *Oil Palm Mill planned for construction.</p> <p>There are POM & Plantations is still progress, consist of:</p> <ol style="list-style-type: none"> 1. Genting Indah Oil Mill: The remediation and compensation procedures is pending for Genting Kencana Estate. LUCA has been passed. Concept Note for Remediation and Compensation has been resubmitted to RSPO. 2. Globalindo Oil Mill: In process of obtaining HGU (Estate: Lamunti Barat, Lamunti Timur, Mangkatip, Bakuta dan Plasma). NPP for PT UAI in process of obtaining HGU for UAI. 3. Golden Hill Oil Mill: In the process of obtaining Forest Release and Forest Exchange prior to HGU application. (Estate: Puroh, Masaha, Zircon, Waterfall, Muhun, Talawang, Golden Hill, Diamond, SP Plasma, KMJ Plasma and DWK Plasma). 4. CSC Oil Mill: In process of obtaining HGU and Oil Mill planned for construction. Furthermore, HCSA report completed review. 5. SAP Oil Mill: In process of obtaining HGU and Oil Mill planned for construction. Furthermore, HCSA report completed review. 6. PALJ Oil Mill: NPP in progress. HCSA report completed review 7. KIU Oil Mill: NPP in progress. HCV report being reviewed by HCVRN and HCSA report to be reviewed by HCSA. <p>The commitment regarding to the plan of certification proses of uncertified unit has been signed by the management representative on 04 November 2020.</p>					
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard				
	The smallholder under PT SISM and PT SMA are included in this certification scope.				

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-3 (Remote Audit)	<ol style="list-style-type: none"> Ardiansyah (Lead Auditor). Indonesian citizen, Bachelor of Forest Resources Conservation, Department of Forestry. Had work experience in Environmental NGO for 6 month (2007) and consultant for making EIA Document and KLHS for 3 years (2009 – 2012). Had attend training such as RSPO Lead Auditor course, Lead Auditor ISPO, OHSAS (SIO 18001 – 2007), land cover crop mapping and Management System Certification (ISO 9001-2008), Environmental Management System Certification (ISO 14001-2004), Social Auditing and Conflict Resolution. Had many times following audit activities related to sustainable palm oil certification system which is ISPO as an auditor since 2012 for legal, environmental aspect, conservation and social. Fluent in Bahasa and Malay. During this audit, he assigned to verify legal aspect, land dispute, transparency, TBP and social aspect. Asystasya Aishah Silalahi. Indonesia Citizen, Bachelor of Economy, Major of Agribusiness, Faculty of Economic and Management. She has one year experience in consultancy. She has followed training such as ISPO Auditor Training, Lead Auditor ISO 9001:2015, OHS General Expert, RSPO lead auditor training course, SCCS, and several in house training related to environmental, BMP, SA 8000. Has been involved in several audit activities since 2016 related to sustainable palm oil certification covering waste management aspect, Social Aspect, Health and Safety Aspect, and Worker Welfare. During this audit, she verification regarding worker welfare and supply chain. Dwi Haryati (Auditor). Bachelor of Agriculture Department of Agriculture. She has experienced on Palm Oil Plantation as Sustainability staff. Training have been followed include: Training Auditor ISPO, Quality Management ISO 9001-2008, ISO 14001 Environmental Management, ISO 17021 & 17065, HCV, General Health Safety Expert, Health Safety Management System, GHG Workshop by the ISPO Commission, IHT Palm Oil Mill Processing, Awareness RSPO, IHT Best Practice in Peat Management, Mapping Potential and Conflict Resolution in Production Forest, and Social Accountability SA 8000 Training. RSPO audit experience since March 2015 and ISPO since May 2014. During this audit, she verification regarding environment, conservation, and GHG aspect. Sentot Adi Subandono (Auditor trainee). Indonesia citizen, Bachelor of Agriculture, Department of Agricultural Cultivation. He has five years of experience working since 2005 as Plantation Operational Staff and nine years as Internal Auditor in private oil palm plantations in Indonesia. The training that has been attended includes the Basic Management Development Program of Palm Oil Plantation, Use of Limited Pesticides, Best Practices in Internal Auditing, Fraud Auditing: Prevention, Detection, and Investigation, Operational Risk Approach in Internal Auditing, General Occupational Health and Safety Expert, ISPO, ISO 9001: 2015. In this audit activity, verification regarding BMP of agronomy and processing, and OSH which is under the supervision of the Lead auditor.
ASA-3 & ASA-4 (Onsite Audit)	<ol style="list-style-type: none"> Moh Arif Yusni (Lead Auditor). Indonesian citizen. Bachelor of Agriculture, majoring in Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. During the audit, he verified Legality, Social, TBP and Partial certification. Yudhi Yuniarto Tallutondok (Auditor). Indonesian citizen, Bachelor of Fisheries, Padjadjaran University. Have experience of working over three years since 2013 as plantation operations staff in private palm oil plantation company in Indonesia. Training have been followed including Lead Auditor of ISO 9001:2015, Lead Auditor of ISO 14001:2015, ISPO Auditor Training, RSPO P&C Lead Auditor Training Course, RSPO SCC Lead Auditor Course, Social Accountability 8000, Basic Management Development Program Agronomy, Fire Anticipation on Land and Forest, Potential Mapping and Conflict Resolution in Production Forests, Awareness of OHS aspects, ISO 45001:2018, ISO 22000:2009, ISO 19011:2011, ISO 17021:2011, dan ISO 17065:2012. Has participated in audit activities for ISPO and RSPO scheme since 2017 for BMP, OHS, labour, social and legal aspects. In this audit activity performs the assessment of best management practices, OHS, worker welfare, social, legality and SCCS. 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. Since 2015 has been following many audits as auditor base on Best Management Practice and Environment. During the audit, he verified environment aspect, waste management, GHG and conservation aspect.

- 4. Harry Wahyudi (Auditor Trainee).** Indonesian citizen, Bachelor of Agricultural Technology, Department of Agricultural Engineering, Bogor Agricultural University. He has 8 years of working experience as a Field Assistant and Internal Audit Operational in a palm oil company and 3 years working experience as a Supervisor Internal Audit operational in a Industrial Forest Plantation Company. Has attended several trainings such as ISO 19011:2018, ISO 9001:2015, ISO 17021:2015, ISO 17065:2015, ISO 45001:2018, ISO 14001:2015 and OHS General Supervisor. During this audit, has verified transparency, and best management practices aspect under the supervision of the 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-3 (Remote Audit)	Number of auditors : 3 auditor & 1 auditor trainee Number of days for ASA-3 at site : 2 days Number of working days for ASA-3 at site : 6 Working days
ASA-3 & ASA-4 (Onsite Audit)	Number of auditors : 3 auditor & 1 auditor trainee Number of days for ASA-3 & ASA 4 at site : 4 days Number of working days for ASA-3 at site : 12 Working days
2.2.2	Assessment Process
ASA-3 (Remote Audit)	The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Sepanjang Intisurya Mulia to the requirements of RSPO Principles and Criteria For Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20th April 2020 and RSPO Certification System for Principles and Criteria, November 2020. For this section (Remote Audit ASA-3) The assessment was conducted in One method: document review, aiming to observe the sufficiency of types or substances from required documents. Improvement of findings from previous audit findings were observed by auditors at this ASA-3 assessment. Some opportunities for improvement of the results ASA-3 (Remote Audit) will be verified at the next assessment phase ASA-4. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of Recertification. The opening meeting was held on Wednesday 23 August 2021 at 08 am through a teleconference (zoom meeting). As for the participants who attended the opening meeting included the Mill Manager, Estate Manager, General Manager, Supported Team from Jakarta. While the closing meeting will take place on Thursday 24 August 2021 at 16.00 pm. attended by the same participants as the opening meeting. Since 2021, there is merge of estate in Abadi 3 which previously Abadi 3-4 become Abadi 3. The assessment program please find Appendix 2
ASA-3 & ASA-4 (Onsite Audit)	The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the Mulia Oil Mill – PT Sepanjang Intisurya Mulia and its supply base to the requirements of: 1. RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20 th April 2020 2. RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020 Additional Documents: <ul style="list-style-type: none"> • RSPO Notice to CB on RSPO P&C On-site & Remote Audits, on 24th March 2020 • Contingency RSPO Audit Procedure (This procedure is applicable when force majeure (such as pandemics, natural disasters, civil unrest, etc.) preventing the audit team from conducting field verifications) 25 August 2020

- Contingency RSPO Audit Procedure for RSPO Principles & Criteria and Independent Smallholder Standard (Version 2) Approved by Assurance Standing Committee on 22 October 2021

The scope of certification of consist of one mill Mulia Oil Mill – PT Sepanjang Intisurya Mulia operation consisting of one (1) mill, five (5) oil palm estates and 3 smallholder organization (1703 smallholders) namely

- PT Sepanjang Intisurya Mulia: Mulia 1-2 Estate, Mulia 3-4 Estate, Mulia 5-6 Estate; Koperasi Sawit Trimulya Lestari (406 members); Koperasi Sawit Harapan Jaya (700 members)
- PT Sawit Mitra Abadi: Sawit Mitra Abadi 1-2 Estate, Sawit Mitra Abadi 3-4 Estate; Koperasi Jasa Panca Mitra Abadi (597 members)

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

The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to directly observe the sufficiency of implementation on site.

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

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal meetings at their housing. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix I.

Some opportunities for improvement of the results ASA-4 & Recert delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-1.1). All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of this assessment

The assessment program please find Appendix 2

2.2.3	Locations of Assessment
ASA-3 (Remote Audit)	Will be conducted on the onsite audit
ASA-3 & ASA-4 (Onsite Audit)	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 observed via video by team auditor are: Mulia Oil Mill

- **Security.** Observation and interview with operator related to technical procedure and OHS aspect.
- **Weigh-bridge.** Observation and interview with operator related to technical procedure and SCCS aspect.
- **Central Warehouse/Store.** Observation on environment and safety aspect management.
- **Chemical Store.** Observation on environment and safety aspect management.
- **Lubricant Store.** Observation on environment and safety aspect management.
- **Workshop.** Observation and interview with Foreman on his understanding towards technical, environment, safety and manpower aspect, as well as facilities provided by company management.
- **Scheduled/Hazardous Waste Store.** Observation on environment and safety aspect management.
- **Laboratory.** Observation and interview with Laboratory Assistant on his understanding towards technical, environment, safety and manpower aspect, as well as facilities provided by company management.
- **Grading Station.** Observations related best practices, OHS, and employment.
- **Sterilizer room.** Observations related best practices, OHS, and employment.
- **Boiler.** Observations related to OHS, understanding of emergency response, and operator licenses.
- **Engine room.** Observations related to OHS, understanding of emergency response, and operator licenses.
- **Hydrant No.6 Simulation.** Observation related emergency response, readiness of firefighting equipment.
- **Mill Drainage.** Observations mill effluent lines, sanitation mill and flow of leaching mill.
- **WWTP.** Observation on WWTP, indication of waste overflow, OHS implementation, and interview with worker about worker welfare, OHS, and company's policies.
- **Solid Waste.** Observation of the management of Solid waste consist of Solid, boiler ash, fiber and shell from the production process of mill.
- **WTP.** Observations and interviews related to water management, recording of water use, health checks, PPE and waste management.
- **Land application, Block F4, Mulia 1 estate.** Observation for waste water management and nutrient cycle strategy

Mulia 1-2 Estate

- **Agrochemical storage.** Observation and interview about worker welfare, hazardous waste management, OHS implementation, and understanding of work procedure
- **Fertilizer storage.** Observation and interview about worker welfare, OHS implementation, and understanding of work procedure
- **Material storage.** Observation and interview about worker welfare, OHS implementation, and understanding of work procedure
- **Housing Complex.** Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.
- **Rinse Bathroom.** Observation and interview about worker welfare, OHS implementation, and understanding of work procedure.

Mulia 3-4 Estate

- **Manuring, Block R11.** Observation related fertilizer application and OHS.
- **Harvesting, Block J10.** Observation related FFB quality, harvesting round, OHS, and employment.
- **Agrochemical storage.** Observation and interview about worker welfare, hazardous waste management, OHS implementation, and understanding of work procedure
- **Fertilizer storage.** Observation and interview about worker welfare, OHS implementation, and understanding of work procedure
- **Material storage.** Observation and interview about worker welfare, OHS implementation, and understanding of work procedure
- **Landfill.** Observation to see its condition and management.
- **Firefighting storage.** Observation about condition about the firefighting facilities and equipment.
- **Schedule waste storage.** Observation about storage condition, hazardous waste stock, emergency response facility, and waste management.
- **HGU stakes and land demarcation No. 024, No. 025, No. 026, No. 027 and 028.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HCV hilly Area and forest (Gemilang hill), Block J12 division 3.** Observation the implementation of

management in HCV of management hilly area.

- **Housing Complex.** Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.
- **Generator (Electricity).** Observation for waste management, and interviews related to workers facility, electricity, domestic waste, socialization of company policy and complaint mechanism.
- **Daycare.** Observation and interview with worker related labor aspect and OHS.
- **Land fill Block N10.** Observation related domestic waste management
- **Pump room.** Observation for waste management, and interviews related to workers facility, sources of fresh water, socialization of company policy and complaint mechanism.
- **HCV Tayap River Riparian Area, Block R16 division 2.** Observation the implementation of management in HCV of riparian area.

Mulia 5-6 Estate

- **Landfill area Block P11,** Observation and interview to supervisor anorganic and organic management, and OHS aspect.
- **Harvesting at Block S18.** Observation to harvesting activities and interview with Foreman and 4 Harvesters, on their understanding towards technical, premium calculation, daily work base, OSH, Labor, environment and conservation aspects, as well as facilities provided by the company.
- **Manuring at Block S19.** Observation to manuring activities and interview with Foreman and 3 fertilizer applicators, on their understanding towards technical, premium calculation, daily work base, OSH, Labor, environment and conservation aspects, as well as facilities provided by the company.
- **Terrace Area Block S18,** Observation related soil management and conservation
- **Pesticide Application at Block T19.** Observation to spraying activities and interview with Pesticide Applicators, on their understanding towards technical, premium calculation, daily work base, OSH, Labor, environment and conservation aspects, as well as facilities provided by the company.
- **Workshop.** Observation and interviews with employees related to management of hazardous.
- **Pesticide Warehouse.** Observations related to condition of the storge, symbols, MSDS, channels and pesticide spill containers, and pesticide stock, and management of hazardous and toxic materials.
- **Fertilizer Warehouse.** Field observations related to condition of the storge, symbols, MSDS, channels and pesticide spill containers, and pesticide stock, and management of hazardous and toxic materials.
- **Material Warehouse.** Field observations and Interview related to condition of the storge, symbols, MSDS, channels and pesticide spill containers, and pesticide stock, and management of hazardous and toxic materials.
- **Scheduled/Hazardous Waste Store.** Observation on environment and safety aspect management.
- **Fuel tank.** Observation environment and safety aspect management
- **Firefighting storage,** Observations related to the preparedness of the emergency response team, the ability and understanding of members, the completeness of the fire prevention equipment.
- **Mentiawkaw Riparian (Conservation Area).** Observation related to conservation area.
- **Generator Set.** Observation on environment and safety aspect management
- **Rinse House.** Observation about condition of the house, waste management, and emergency response facility.

Koperasi Sawit Trimulya Lestari

- **Harvest, Block J5 Division Plasma 1.** Technical observation of work according to SOP and implementation of OHS aspects
- **Pick Loses Fruits, Block J5 Division Plasma 1.** Technical observation of work according to SOP and implementation of OHS aspects.
- **Path spraying, Block K5 Division Plasma 1.** Technical observation of work according to SOP and implementation of OHS aspects.

Koperasi Sawit Harapan Jaya

- **Pesticides Application, Block T10.** Observation related pesticide application and OHS.
- **Harvesting, Block U11.** Observation related FFB quality, harvesting round, OHS, and employment.
- **HGU stakes and land demarcation No. 042, No. 043, No. 041, and No. 044.** Observation of aspect of land

demarcation and maintenance of HGU pole, and land dispute potency.

Abadi 1-2 Estate

- **Manuring, Block H11.** Observation related fertilizer application and OHS.
- **Harvesting, Block J28.** Observation related FFB quality, harvesting round, OHS, and employment.
- **Agrochemical storage.** Observation and interview about worker welfare, hazardous waste management, OHS implementation, and understanding of work procedure
- **Fertilizer storage.** Observation and interview about worker welfare, OHS implementation, and understanding of work procedure
- **Material storage.** Observation and interview about worker welfare, OHS implementation, and understanding of work procedure
- **Housing Complex.** Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.
- **Pump room.** Observation for waste management, and interviews related to workers facility, sources of fresh water, socialization of company policy and complaint mechanism.
- **Generator (Electricity).** Observation for waste management, and interviews related to workers facility, electricity, domestic waste, socialization of company policy and complaint mechanism.
- **Daycare.** Observation and interview with worker related labor aspect and OHS.
- **Land fill Block H17.** Observation related domestic waste management
- **HGU stakes and land demarcation No. 98 (block F15) and 94 (block D12).** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.

Abadi 3-4 Estate

- **Harvesting at Block E43.** Observation to harvesting activities and interview with Foreman and 4 Harvesters, on their understanding towards technical, premium calculation, daily work base, OSH, Labor, environment and conservation aspects, as well as facilities provided by the company.
- **Manuring at Block J41.** Observation to manuring activities and interview with Foreman and 3 fertilizer applicators, on their understanding towards technical, premium calculation, daily work base, OSH, Labor, environment and conservation aspects, as well as facilities provided by the company.
- **Pesticide Application at Block F43.** Observation to spraying activities and interview with Pesticide Applicators, on their understanding towards technical, premium calculation, daily work base, OSH, Labor, environment and conservation aspects, as well as facilities provided by the company.
- **Workshop.** Observation and interviews with employees related to management of hazardous.
- **Pesticide Warehouse.** Observations related to condition of the storage, symbols, MSDS, channels and pesticide spill containers, and pesticide stock, and management of hazardous and toxic materials.
- **Fertilizer Warehouse.** Field observations related to condition of the storage, symbols, MSDS, channels and pesticide spill containers, and pesticide stock, and management of hazardous and toxic materials.
- **Material Warehouse.** Field observations and Interview related to condition of the storage, symbols, MSDS, channels and pesticide spill containers, and pesticide stock, and management of hazardous and toxic materials.
- **Scheduled/Hazardous Waste Store.** Observation on environment and safety aspect management.
- **Fuel tank.** Observation environment and safety aspect management
- **Firefighting storage,** Observations related to the preparedness of the emergency response team, the ability and understanding of members, the completeness of the fire prevention equipment.
- **Generator Set.** Observation on environment and safety aspect management
- **Rinse House.** Observation about condition of the house, waste management, and emergency response facility.

Koperasi Jasa Panca Mitra Abadi

- **Pesticides Application, Block AF I14.** Observation related pesticide application and OHS.
- **Harvesting, Block AD I16.** Observation related FFB quality, harvesting round, OHS, and employment.
- **HGU stakes and land demarcation No. 112, No. 111 and No. 110.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.

- **HCV hilly Area and forest (Semberuang hill), Block M7.** Observation the implementation of management in HCV of management hilly area.
- **HCV Majo River Riparian Area, Block 113.** Observation the implementation of management in HCV of riparian area.
- **HCV Danau Pasir River Riparian Area, Block 18.** Observation the implementation of management in HCV of riparian area.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
	<p>Summary of stakeholder consultation process Consultation of stakeholders for Mulia POM – PT Sepanjang Intisurya Mulia was held by:</p> <ul style="list-style-type: none"> • Public Notification on website of PT Mutuagung Lestari on 17 June 2022 • Public consultation meeting with government institution 25 July 2022 • Public consultation meeting with communities including previous land owner 25 July 2022 • Public consultation meeting with internal stakeholders and contractor 25 July 2022 • Public consultation through sending email to NGO (WALHI, AMAN, WWF Indonesia and Sawit Watch) on 19 July 2022 <p>Numbers of input from stakeholders were clarified by PT Sepanjang Intisurya Mulia <i>as part of this report</i></p>
2.3.2	Stakeholder contacted
	Appendix 1
2.4	Determining Next Assessment
	The next visit (RC) will be conducted until 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 Mulia Oil Mill – PT Sepanjang Intisurya Mulia operation consisting of one (1) mill, five (5) oil palm estates and 3 scheme smallholders (1703 smallholders).

During the assessment, there were four (4) Nonconformities were assigned against Major Indicator, 2 (two) Nonconformities were assigned against Minor Indicator; and one (1) opportunity 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 actions that had been reviewed and accepted by Auditors in form of documentation evidences e.g. (document record/photographic/etc...).

MUTUAGUNG LESTARI found that Mulia Oil Mill – PT Sepanjang Intisurya Mulia complied with the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification System for Principles and Criteria, November 2020.

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1		
The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1		
<p>The company shows the document No. GPN-CER-06 Revision 00 which informs the data of the list of types of information that may be known by the public in 2022 which has been approved by the Senior Manager of Community Development. The documents that can be accessed based on the letter include:</p> <ul style="list-style-type: none"> • Legal: Plantation Business Permit, <i>Hak Guna Usaha (HGU)</i> and notarial deed. • Mulia Oil Mill: Mill processing permit, waste water utilization permit. • Human Resources: Labor Union Structure, Employee Cooperative Structure, Social Insurance Administration Body (<i>BPJS</i>) for Manpower and Health • Community Development: Internal & External Environmental Communication SOPs, Community Complaints SOPs, Land Acquisition SOPs • OHS & employment aspect: Employment mandatory report with the number 12940.20220718.0003 on behalf of PT Sepanjang Intisurya Mulia dated July 18, 2022 and is required to report back on July 18, 2023, Employment mandatory report with the number 12940.20210907.0005 on behalf of PT Sawit Mitra Abadi dated September 07, 2021 and is required to report back on September 07, 2022, PT Sepanjang Intisurya Mulia OHS Committee Quarter I 2022 Report of which is reported to the local Manpower Office on April 05, 2022, PT Sepanjang Intisurya Mulia OHS Committee Quarter II 2022 Report of which is reported to the local Manpower Office on July 08, 2022, PT Sawit Mitra Abadi OHS Committee Quarter I 2022 Report reported to the local Manpower Office on March 31, 2022, PT Sawit Mitra Abadi OHS Committee Quarter II 2022 Report reported to the local Manpower Office on July 07, 2022. 		
<p>These documents can be accessed by sending a request to management.</p>		
1.1.2.		
<p>Based on the results of document reviews and interviews with agencies, such as the Department of Agriculture, Livestock and Plantation of Ketapang Regency, the Environment Agency, Land Office and Manpower Agency, it is known that the information submitted by the certification unit has been presented in an appropriate language and can be accessed by the agency.</p>		

The company has provided evidence that the information has been received in an appropriate form and language for the relevant stakeholders, such as the report on the development of the plantation business (LPUP) No. SIsM/KB-ROH/JUL/2022/002 semester II 2022 received by the Head of the Department of Agriculture, Livestock and Plantation of Ketapang Regency on July 20, 2022.

1.1.3

Based on a review of the Stakeholder Public Information Request Register Book document in 2022, it is known that there were requests for information from stakeholders along with the responses provided by the Company, namely:

- Head of Mensubang Village: request for Company SOP data in hard copy on March 14, 2022 with the aim of conducting public supervision. The response from the company was carried out on the same date, namely socializing and providing a copy of the SOP.
- Partners of the *Badan Pusat Statistik (BPS)* of Ketapang Regency: request for Company Registration Numbers and company profiles in soft copy on 5 July 2022 for the purpose of Updating the Directory of Agricultural Companies (*DPP*) and the Directory of Other Agricultural Businesses (*DUTL*). The response from the company was carried out on the same date, namely providing the requested data.

The company has recorded in the Communication and Consultation Book, shows that responses were provided in an adequate and timely manner, i.e. no later than 2 weeks after the letter is received.

1.1.4

The company shows the mechanism for providing information to stakeholders, namely document No. SISM/CDP-03-00.01 dated 01 Jan 2016 for PT SIsM and document No. SMA-CPD-06-00 dated March 1, 2015 for PT SMA. The procedure states that the provision of information is carried out in direct interaction, meetings and through letters. The provision of information is up-to-date and continuous where the information that has been provided has received a response from stakeholders, the company will follow up on requests for information within 1 - 2 weeks. Provision of information that has been provided Recording, distribution and monitoring of requests for information is carried out by Community Development (CD) staff. Procedures are available in Indonesian and delivered through outreach. This procedure has been socialized to stakeholders such as on July 13, 2020 in Mendonang Village, July 14 in Pangkalan Telok Village and July 14 in Tanjung Medan Village.

1.1.5

The company has a list of relevant stakeholders updated on 01 April 2022, which is summarized as follows:

PT SIsM

- Representatives from the Village Administration: Head of Nanga Tayap Village, Head of Sepakat Jaya Village, Secretary of Nanga Tayap Village, Secretary of Sepakat Jaya Village, Head of Pangkalan Telok Village, Secretary of Pangkalan Telok Village, Head of Nanga Tayap Health Center,
- Representatives from the sub-district and district governments: Head of the Ketapang District Plantation Agency, the Ketapang District Land Agency, the Head of the Environment Agency, the Head of the Ketapang District Manpower and Transmigration Agency, the Nanga Tayap Sub-district Head,
- Local NGO representatives: Tropenbos Indonesia Foundation, Inisiasi Alam Rehabilitasi Indonesia Foundation.
- Cooperative representatives: Trimulya Lestari Palm Oil Cooperative, Harapan Jaya Palm Oil Cooperative.
- Contractor Representatives: CV Ormenta, Jasa Panca Mitra Abadi Cooperative, CV TJP.
- Union Labour Representative: SIsM Trade Union.

PT SMA

- Representatives from the Village Government: Pangkalan Telok Village Head, Mensubang Village Head, Pangkalan Telok Village Secretary, Mesubang Village Secretary, Pangkalan Telok Village Community Leader, Mensubang Village Community Leader.
- Representatives from sub-district and district governments: Nanga Tayap sub-district head, Nanga Tayap police chief, district military command, Head of Ketapang District Agriculture and Plantation Agency, Ketapang District Land Office, Ketapang District Environment Agency, Ketapang District Manpower and Transmigration Agency.
- Local NGO representatives: Tropenbos Indonesia Foundation, Inisiasi Alam Rehabilitasi Indonesia Foundation.
- Cooperative representatives: Jasa Panca Mitra Abadi Cooperative, Abadi Harapan Baru Cooperative.

- Contractor Representatives: CV Ormenta, Jasa Panca Mitra Abadi Cooperative, CV TJP.
- Union Labour Representatives: Mitra Andalan Union, Batu Panglima Union.

Status: Comply

1.2

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

1.2.1

The company shows the code of conduct (COC) document issued by the President Director of Genting Plantations, Update on 01 June 2020. The COC states that the company has a strong commitment to implementing business ethics with good integrity at all times, which includes fair business behavior, anti-corruption, bribery and abuse, based on facts, honest and timely, fair, in accordance with applicable regulations, mutual respect and protection of whistleblowers. Socialization has been carried out to all employees and contractors since 2017. For refreshment, COC has also been delivered through the muster morning every day by the Division Assistant Manager.

1.2.2

The company has several systems that aim to monitor compliance with the code of ethics and business ethics, which are presented in several documents, as follows:

- Annual RSPO and ISPO Internal Audit Report by the Internal Auditor.
- Management Review Report.
- Resident Plantation Advisor Report
- Financial Audit Report by Independent Public Accountant.
- Socialization of the company's code of ethics to contractors.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

2.1

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

2.1.1

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

Legal Aspect

The company shows the land ownership and environment documents like HGU (Land Use Title) and AMDAL document.

BMP Aspect

In term of BMP. Several regulation pursuance towards applicable regulation conducted by the unit of certification is presented as follows:

- Has conduct zero burning for land preparation.
- Have a policy to stop the use of paraquat herbicide and no use of paraquat herbicide was found.
- Using oil palm seeds from seed-producing companies that are recognized and certified by the authorized agency
- Unit of certification has adopted integrated pest management which consist of early warning system, census, biological control, chemical control with justification and evaluation.

Employment Aspect

- Employee wages have been referred to the Decree of the Governor of West Kalimantan No. 1462/DISNAKERTRANS/2021 concerning Ketapang District Minimum Wage 2022. The decree stipulated the minimum wage for estate and the mill sector with a value of IDR 2,876,252.79.
- The certification unit has implemented a structure and scale of employee wages based on years of service and work assessment of each employee.
- PT SIsM Collective Labor Agreement for the period 2021-2023 which has been ratified based on the Decree of the Head of Manpower and Transmigration Office of Ketapang Regency No. 188 Year 2021 dated 06 December 2021.
- PT SMA Collective Labor Agreement for the period 2021-2023 which has been ratified based on the Decree of the Head of

Manpower and Transmigration Office of Ketapang Regency No. 057/TKT-08/560/2022 dated 12 April 2022.

OHS Aspect

Based on the document review of Operator's List of Names, it is known that the certification unit already has workers who have received training in accordance with the type of work regulated in government regulations, which are summarized as follows:

- The certification unit has backhoe loader operator who already has a license, for example license No. Ser.13. 7052- OPK3-PAA/VI/2013 with a validity period of up to September 21, 2025.
- The certification unit has motor grader operator who already have a license, for example the license Ser.13. 7053- OPK3-PAA/VI/2013 with a validity period of up to August 23, 2024.
- The certification unit has dump truck operator who already have a license, for example the license No 5/4445/AS.02.00/1/2021 with a validity period of up to January 12, 2026.
- The certification unit has bulldozer operators who already have a license, for example license number No 5/4444/AS.02.00/1/2021 with a validity period of up to January 12, 2026.
- The certification unit has compactor operators who already have a license, for example license number No Ser. 8444/OPK3 /PAA - LT /VI/2016 with a validity period of up to March 30, 2026.

Environment Aspect

The company has complied with environmental regulations, this has been proven by having permits related to the environment such as:

- The company already has an environmental study document, namely the AMDAL Addendum.
- The company has an environmental permit in accordance with the Decree of the Regent of Ketapang Number: 031 / DPMPPTSP-D.B / 2018 regarding environmental permits to increase the capacity of the Oil Palm Processing Plant from 60 tons of FFB / hour to 90 tons of FFB / hour by PT. Sepanjang Intisurya Mulia.
- The company has an environmental permit in accordance with the Decree of the Regent of Ketapang Number: 206 / DPMPPTSP-D.B / 2018 regarding the environmental permit for oil palm plantation activities by PT. Sawit Mitra Abadi.
- PT. SISM has a temporary storage permit for hazardous and toxic waste-based Statement Letter of Fulfillment of PT Sepanjang Intisurya Mulia dated No.660.1/447/DPMPPTSP-D/2020 One-Stop Integrated Service and Investment Service dated November 25, 2020. The permit covered on Mulya Oil Mill, Mulia Estate 2, Mulia Estate 4 and Mulia Estate 5.
- PT. SMA has a permit for temporary storage of hazardous and toxic waste in accordance with the Decree of the Regent of Ketapang Number: 208.2 / DPMPPTSP-D. B / 2018 on June 22, 2018 with a validity period of 5 years from the date of stipulation.
- PT. SISM has a POME land application permit, based Statement Letter of Fulfillment of PT Sepanjang Intisurya Mulia dated No.660.1/081/DPMPPTSP-D/2021 One-Stop Integrated Service and Investment Service dated March 15, 2021. The permit covered on 217,99 Ha at PT Sepanjang Intisurya Mulia Estate. The company has also shown a Commercial/Operational Permit for Disposal of Wastewater issued through the OSS system and issued by Regent of Ketapang on March 15, 2021 (printed on March 16, 2021) valid as long as there are no operational changes.
- Price offer document for domestic liquid waste permit processing dated 3 May 2022.
- Evaluation of the tender winner for PT Enviro Karya Indonesia's domestic liquid waste permit on July 23, 2022.
- Bugged request document dated July 23, 2022.
- That the company is still continuing to process the domestic liquid waste permit.

2.1.2

The company already has documents related to legal compliance in the Law Register Document, divided into several aspects, such as List of labour regulations, List of Legal Provisions and Legislation in the Environmental Sector and List of Legal Provisions and Legislation Related to Plantation Company Activities with the last updated in January 2022 its in line with OFI in previous assessment.. The person who responsibility to update and evaluate the list of regulation is SHE (Social Health & Environment) Representative. SHE department are responsible for identifying, inventorying and evaluating the fulfillment of all legal and regulatory requirements related to aspects and impacts of operations. To ensure compliance with law or regulations, the company conducts an internal audit. Internal audits have been conducted continuously and are documented and reviewed in the management review activities, latest audit was carried out on 15 – 22 March 2022 that carried out by the Sustainability department.

2.1.3

Boundaries monitoring and maintenance programmed twice a year in accordance with SOP Boundaries (HGU) Poles Monitoring (SOP/GPN/23 dated 01 November 2016). Based on monitoring in Period 1 2022 the result of monitoring are presented in the table below:

description	PT SISM	PT SMA
Available	92	74
Damaged	2	2
Missing	32	78
Total	132	154

The position of all legal boundaries already describes in the HGU map issued by BPN. For the missing or damaged boundaries poles, the installation of new poles and repairing will be carried out in semester 2 2022

Based on field observations, the all HGU poles are available on place and maintained. It is also known that there are no indications of land disputes. The positions were checked using GPS, such as observation in PT SISM (HGU Pole 024, No. 025, No. 026, No. 027, No 028, No. 042, No. 043, No. 041, and No. 044) and PT SMA (HGU Pole No. 112, 111, 110, 98 and 94). Land boundaries have been demarcated with boundary trenches or clear control roads.

Status: Comply

2.2

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

2.2.1

List of contractors is presented in document "*Daftar Kontraktor*" that updated on 10 January 2022, which informs stakeholder category, name of PIC, relation, address and contact number. Currently, unit of certification has 15 contractors at operational unit 1 and 20 contractors at operational unit 2 and 3. Based on the verification document of "*Daftar Kontraktor*" show that all third parties, including transporters of toxic and hazardous waste and contractors machine maintenance in mill.

2.2.2

Based on verification to several work agreements, for example with FFB suppliers, such as through agreement No. 003/SISM-M56/TBS/SPK/II/2021 dated 11 January 2021 with CV Lantang Tuah and Agreement No. SISM/X/2021/14 dated 18 October 2021 with CV Lintas Batas Sejahtera, it is known that the work agreement has covered several things, among others

- a. Implementation of sustainability certification system.
- b. Personal protective equipment (PPE).
- c. Prohibition on hazardous material disposal.
- d. Manpower protection.
- e. Law pursuance and human rights.

Based on document verification of the salary slip and proof of *BPJS Ketenagakerjaan* for each local contractor employee are known that each worker has received wages in accordance with the government's regulation. In addition, the certification unit has also included its employees in the *BPJS Ketenagakerjaan* program.

Monitoring of law or regulation pursuance by contractors is presented in document of evaluation of contractor and form of evaluation and contractor. Sighted contractors evaluation dated 27 December 2021.

2.2.3

Based on verification to several work agreements with local contractor, for example through agreement No. 001/SISM-M5&6/TBS/SPK/II/2022 dated 03 January 2022 with CV Lantang Tuah and Agreement No. 002/SISM-M5&6/TBS/SPK/II/2022 dated 03 January 2022, it was known that clauses of disallowing child, forced and trafficked labor has been explained in the agreement

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

Based on interview with local contractor, it was known that socialization towards pursuance regulation on safety and manpower has delivered during contract agreement.

Status: Comply

2.3

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

2.3.1

Based on documents verifications, interview with managements as well as field observation in mil weighbridge it was known FFB that accepted by Mulia Mill are originally from estate or scheme smallholders under managed Genting Plantation Bhd Group.

2.3.2

As mentioned in Indicator 2.3.1, it was known MOM do not accepted FFB from out growers, agent or middlemen. All FFB process originally from its own estate under the scope of certifications and other estates under the subsidiary of Genting Plantation Bhd Group.

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 shows a record of long-term planning in the Budget document of PT SIsM and PT SMA for the period 2022-2026 approval by the Senior Vice President. The document contains information on plantation business including projected estate FFB production, plasma FFB production, CPO and PK production, costs, oil and kernel extraction rates, processing costs, estimated prices, general estate costs, and plasma budgets.

	2022	2023	2024	2025	2026
Total Production (PT SIsM & PT SMA) (ton)	422,678	474,534	497,371	531,691	573,426
CPO (ton)	96,799	108,675	113,905	121,765	132,997
OER (%)	22.90	22.90	22.90	22.90	22.90
PK (ton)	16,015	17,979	18,845	20,145	22,003
KER (%)	3.79	3.79	3.79	3.79	3.79

Based on the description above, it can be concluded that the company has a record of long-term planning and monitoring of the plantation business which also includes jointly developed businesses for scheme smallholders.

3.1.2

The companies explained that criteria of replanting could be due to several consideration, such as age of palms (>25 years old), low productivity (<10 ton FFB/ha/year), palm height (>12 m) and recommendation from Agronoist or other management consideration. However, based on year of planting data, it was known that palms in PT SIsM and PT SMA were planted from 2007 to 2016. Thus, based on year of replanting only, it was known that replanting activities will be conducted as early in 2032. Hence, there is no replanting program in the near future.

3.1.3

The company has conducted a periodic Management Review once a year, for example the company showed the recording of the Management Review on April 28, 2021 and was attended by Senior Managers and Estate Managers and staff with 24 participants. In the Minute Of Meeting Management Review, discussions were held on ISPO & RSPO internal audit/external audit reports, SCCS, Actions, outputs, recommendations for improvement, changes to the management system, Personnel In Charge, supported, and target date.

Status: Comply

3.2

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

3.2.1

For continuous improvement evaluation and monitoring, unit of certification has conducting internal and external audit, as well as periodic performance report by unit management. The action plan for continues improvement is implemented based on consideration of the main social and environment impact, for example as shows through several documents, as follows:

- Records of the implementation of the Management Review periodically every year, for example the company shows the recording of the implementation of the Management Review on April 28, 2021 and was attended by Senior Managers and Estate Managers and staff with 24 participants. In the Minute Of Meeting Management Review, discussions were held on ISPO & RSPO internal audit/external audit reports, SCCS, Actions, outputs, recommendations for improvement, changes to the management system, Personnel In Charge, supported, and target date.
- Records of the results of the RSPO internal audit of PT SIsM & SMA which were carried out on 15 – 22 March 2022. with the results of five non-conformities in the RSPO internal audit. Then also shown documents proof of improvement against non-conformances.
- Mulia Oil Mill Operational Internal Audit on 27 – 29 January 2022, by checking store management, such as compliance with control documents (based on SOP) and additional adequate controls.
- Resident Plantation Advisor Report No. RPA/R1/2022/045/Mulia 4 at PT SisM dated 18-26 January 2022, which informs the Issue, Issue Description, recommendation, target date and Personnel In Charge, and the total score of the assessment is 70.1 % (Need Improvement).
- Implementation of innovations for sustainable business improvement, such as innovations in the BMP aspect, namely FFB Quality Monitoring using the OYP System, which is an application to monitor the quality of oil palm fruit harvested by company harvesters, so that the data can be controlled by all concerned departments; Purchase Monitoring using Metabuyer, namely an application to facilitate sub-data for the process of purchasing goods needed by the company for both operational and non-operational equipment.
- Management and monitoring of factory effluent quality. Through WWTP pond management, wastewater quality testing, air quality management and monitoring, road maintenance, air quality testing, groundwater management and monitoring, groundwater quality testing and reporting to environmental services
- Hazardous waste management. Storing hazardous waste in permitted hazardous waste warehouse, managing and monitoring hazardous waste.
- In managing Green House Gas (GHG), the company has implemented a zero burning policy, utilizing shells and fiber as renewable energy. Regular engine maintenance, regular emission quality tests and GHG calculations using the RSPO palm GHG calculator.

3.2.2

Base on document verification, for The RSPO metric template known annual data 12-month period use (January to December 2021) for schedule reporting annual data social and environmental, included monitoring data of water consumption, management dan monitoring HCV.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The company shows the SOP List document for the certification unit, including:

- The palm oil processing aspect consists of 18 procedures as stated in the SOP-PRD-01 – SOP-PRD-18 document. The procedure has covered relevant activities in oil palm processing activities such as processing scenarios, work instructions on technical matters at each processing station, quality control, FFB reception, FFB grading, waste management, water treatment, waste for land application, transportation of CPO and Kernel, monitoring and maintenance, and laboratories.
- The Agronomy Aspect of Oil Palm consists of 13 procedures contained in the OPM 01 – 013 document. The procedures have covered the relevant activities in oil palm cultivation activities such as planning, seeding, planting, land conservation, terrace making, pest and disease control, weed control, fertilization, tree replacement during TBM, road and drainage maintenance, harvesting, production projection, and marginal land management.
- The Environment aspect consists of 15 procedures contained in the ENV document. The procedures have covered matters relevant to environment such as procedures for handling B3 waste, medical waste management procedures, protected area

monitoring procedures, waste management procedures in work and residential areas, guidelines for determining protected areas, land application monitoring procedures, and liquid waste quality management procedures.

Based on the review of the procedure documents, it can be concluded that the agronomic, processing and safety procedures for oil palm are available in Bahasa, and are still relevant to the current situation and cover all major aspects from the field to the mill

3.3.2

The company has a mechanism to consistently check the implementation of the procedures listed in the SOP/SISM/SSTA03 and SOP/SMA/SSTA03 documents regarding Internal Audit Procedures, which were issued on February 1, 2020. The document explains the purpose of the SOP, namely as a reference standard for conducting internal audits. so that problems found can be corrected immediately. The document also describes the framework of the content of the report that informs conformity or non-conformity, corrective action, verification of corrective action and completion of non-conformance reports if any.

The company also shows the Management Review Procedure document no. SOP/SISM/SSTA01, which explains the procedures for reviewing all strategic objectives and targets, Occupational Safety and Health and the Environment, procedures, guidelines, plans and other tools. The procedure also includes gathering suggestions for improvements to process performance and product conformity as well as a follow-up to the previous management review meeting.

3.3.3

The company shows a record of mechanisms for checking consistent implementation of procedures, for example:

- Records of the RSPO internal audit report of PT SisM & SMA which were carried out on 15 – 22 March 2022, with the results of five non-conformities in the RSPO internal audit. Then also shown documents evidence of improvement against non-conformances.
- Mulia Oil Mill Operational Internal Audit on 27 – 29 January 2022, by checking store management, such as compliance with control documents (based on SOP) and additional adequate controls.
- Resident Plantation Advisor Report No. RPA/R1/2022/045/Mulia 4 at PT SisM dated 18-26 January 2022, which informs the Issue, Issue Description, recommendation, target date and Personnel In Charge, and the total score of the assessment is 70.1 % (Need Improvement).
- Records of the implementation of the Management Review on April 28, 2021 and attended by Senior Managers and Estate Managers and staff with 24 participants. In the Minute Of Meeting Management Review, discussions were held on ISPO & RSPO internal audit/external audit reports, SCCS, Actions, outputs, recommendations for improvement, changes to the management system, Personnel In Charge, supported, and target date.

The company also evaluates the performance of contractors working with companies contained in the evaluation form document for contractors which includes compliance with OHS and environmental policies, providing PPE to contractor workers, compliance with labor regulations such as providing BPJS, wages according to regulations, besides that a list of complaints from outside parties is recorded to contractors related to the environment and OHS.

Status: Comply

3.4

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

3.4.1

The company had not carried out any new plantings. PT. SISM already has environmental documents in the addendum document for environmental impact analysis and environmental management plans - environmental monitoring plans for activities to increase the capacity of palm oil mills from 60 tons of FFB / hour to 90 tons of FFB / hour by PT Sepanjang Intisurya Mulia which is located in the Village Pangkalan Teluk, Nanga Tayap District, Ketapang Regency in 2016. The environmental document has been approved in accordance with the Decree of the Ketapang Regent Number 031 / DPMPTSP-DB / 2018 dated January 23, 2018. The environmental management plan and monitoring plan are as follows:

- Decreased air quality
- Increased noise
- Decreasing water quality

- Increase business opportunities
- Increase in community income
- Attitudes Changes and Public Perception
- Public health problems
- Work accident

PT SMA already has an Environmental Permit in the form of an Environmental Impact Analysis Document (AMDAL) which has been approved by the Governor of West Kalimantan in accordance with Decree No. 108 of 2006 dated April 4, 2006 concerning the Environmental Feasibility of Plantation Activities (Area + 15,800 Ha) and a palm oil processing factory (Factory Capacity 60 TBS / Hour) by PT Sepanjang Intisurya Abadi in Nanga Tayap District, Ketapang Regency, West Kalimantan Province. Currently PT SMA has an Addendum for Environmental Impact Analysis (AMDAL) and RKL-RPL for PT. Sawit Mitra Abadi in 2018. This addendum was made due to the addition of an area of ± 1,000 Ha. PT SMA also has an environmental permit in accordance with the Decree of the Regent of Ketapang Number: 206 / DPMPSTSP-D.B / 2018 regarding environmental permits for oil palm plantation activities by PT. Sawit Mitra Abadi on June 8, 2018. The management plan and environmental monitoring plan are as follows:

- Decreasing surface water quality
- Increase in community income
- Employment Opportunity
- Attitudes and perceptions of society
- Decreased air quality
- Increased noise
- Decreased public health
- Business opportunities
- Public attitudes and perceptions of replanting activities.

Based on the document review, it is known that all operational areas and the impact of the company's operational activities have been covered in the environmental documents that are owned. Based on interviews with the Public Housing, Settlement and Environmental Services Office of Ketapang Regency, it is known that the company already has an environmental permit from the Ketapang Regency Government for PT. SISM and PT. SMA.

PT SMA has carried out social impact identification (SIA) which was carried out in 2009 by consultant Aksenta. Data collection was carried out in March-April 2009. Then the company evaluated the implementation and revision of the SIA document in December 2016. After that the company re-identified its social impacts in June 2019. This re-identification was carried out to see the strategic conditions that developed from the company's impact carried out by SAN Consultants. This re-identification process has been carried out with FGDs with affected parties such as the surrounding village community, for example Mensubang Village, Pangkalan Teluk Village, Bayangan village, Tanjung Medandan Village Subdistrict Nanga Tayap District Ketapang which was conducted on May 14 2019.

In November 2021, the company conducted an SIA review of the scope of the study carried out by consultants at PT SMA village of Tanjung Medan, Mensubang and Pangkalan Elok. Field data collection activities were carried out on 6-11 September 2021 by involving affected stakeholders, both internally and externally through in-depth interviews, focus group discussions (FGD) and field observations. The stakeholders involved in the preparation of the SIA study were 12 stakeholders with details of PT SMA Management, PT SMA employees, Ketapang Regency Government, Plantation Regency, Cooperatives Regency, Head of Sub-district, Village Heads and Village Government, traditional leaders & religious leaders, community leaders, oil palm farmers & rubber, land-owning communities and nearest community.

In November 2021, the company conducted an SIA review of the scope of the study carried out by consultants at PT SISM Village of Sepakat Jaya, Pangkalan Suka, Mensubang and Pangkalan Elok. Field data collection activities were carried out on 6-11 September 2021 by involving affected stakeholders, both internally and externally through in-depth interviews, focus group discussions (FGD) and field observations. The stakeholders involved in the preparation of the SIA study were 12 stakeholders with details of PT SMA Management, PT SMA employees, Ketapang Regency Government, Plantation Regency, Cooperatives Regency, Head of Sub-district, Village Heads and Village Government, traditional leaders & religious leaders, community leaders, oil palm farmers & rubber, land-owning communities and nearest community.

3.4.2

Based on the results of document verification of RKL-RPL semester 2-year 2021 PT SISM and PT SMA, it can be concluded that all the management and monitoring parameters requested in the environmental document have been implemented, for example the implementation of environmental management for significant impacts on air quality by carrying out reforestation around the Mill as well as testing to maintain river water quality, noise control in the Mill area, and management of social aspects.

The company has also carried out evaluations for each parameter of significant impact monitoring carried out as required in KepmenLH 45 of 2005, which includes trend evaluation, critical level evaluation and compliance evaluation. Based on the evaluation results, it is known that all parameters are still in accordance with the Quality Standards, and there is no indication of pollution. The environmental management and monitoring plan has been implemented in accordance with the RKL RPL matrix including the increase in community income and changes in community attitudes and perceptions and continues to be improved following the direction of the existing study results.

The impacts identified in the SIA Management and Monitoring Plan November 2021. The plan describes monitoring indicators, monitoring methods, PIC and frequency. Management programs are grouped into social, ecological, environmental and labor fields. In addition to these programs, the company also provides budget/cost estimates for the implementation of each of these programs. These programs are structured according to the identification of the needs of the surrounding community.

As a form of social management, the company has developed/compiled by involving independent parties in conducting social impact assessments related to the company's operational activities. The first social impact assessment was conducted in March 2009 by internal (PT SMA) and on December 2010 for PT. SISM, as a follow-up to the results of the assessment, there are several recommendations/matrixes for the management plan and monitoring of social impacts.

As one of the efforts to improve and pay attention to the latest situation in 2009 and 2010 the company carried out the Social Impact Review and Update which was carried out in November 2021, where this was due to the dynamic social situation and the seriousness of the company to build and maintain the company's sustainability.

The SIA review was carried out by involving the surrounding community, field data collection activities were carried out on 6-11 September 2021 by involving affected stakeholders, both internally and externally through in-depth interviews, focus group discussions (FGD) and field observations. The stakeholders involved in the preparation of the SIA study were 12 stakeholders with details of PT SMA Management, PT SMA employees, Ketapang Regency Government, Plantation Service, Cooperatives Service, Head of Sub-district, Village Heads and Village Government, elder leaders & religious leaders, community leaders, oil palm farmers & rubber, land-owning communities and surrounding communities. Based on the results of the review, there are several issues in the company's operational areas which are categorized into 4 (four) categories, namely Critical, high, medium, and low. These issues include:

- Poor village road access
- The company does not want to buy oil palm farmers
- Plasma yield
- Village cash land has not been realized
- Shifted conservation area
- Land certification
- CSR program transparency
- Bringing in workers from outside the region
- Environmental monitoring sampling that is not in accordance with SOP
- Company concern
- Declining environmental quality
- Employment status

As a follow-up to the SIA review, the company has developed a plan and monitoring of social impacts for the 2022 period, but the auditor team assesses that the management and monitoring plan is only limited to a CSR program and has not referred to the issues identified according to the results of the last review in 2021.

The social impact management and monitoring plan of PT SIA and PT SISM has not been planned and developed in accordance with the results of the last SIA review (November 2021) and there is no time management in the planning and monitoring of the SIA. **Based on that's explanation raised Non-Conformity No 2022.01 with Minor Category**

3.4.3

PT SMA has implemented the results of the environmental permit listed in the RKL-RPL Implementation Report document for semester 2 of 2021. Based on the review of the RKL-RPL implementation document for semester 2 of 2021, it is known that PT. SMA has implemented RKL / RPL in accordance with the direction of the environmental documents it has. PT. SMA has also conducted trend evaluation, critical level evaluation and compliance evaluation. In addition, the implementation of the RKL-RPL semester 2 of 2022 has been reported to Ministry of environment through online report according to electronic receipt 1643765975-5387 (PT SISM) and 16229088473-7105 (PT SMA) dated 2 February 2022.

The last evaluation for environmental monitoring/management plans have been developed on January 2021 and as the feedback of review, the company has included land fire monitoring, land applications, and covid 19 effect on semester 2 the year 2021 monitoring report. The important impacts that are managed and monitored are for example:

- IPM
- Soil and water conservation.
- Zero burning
- Soil erosion

Based on the results of the verification of the RKL-RPL documents for semesters 1 & 2 of 2021 and the results of interviews with relevant stakeholders, it is concluded that non-conformance arises from the environmental monitoring result.

As a form of social management, the company has developed/compiled by involving independent parties in conducting social impact assessments related to the company's operational activities. The first social impact assessment was carried out in April 2009 by internal (PT SMA) and December 2010 by Aksenta as a follow-up to the results of the assessment, there are several recommendations/matrixes for the management plan and monitoring of social impacts.

Based on the results of document verification, several management and monitoring of the SIA in 2022, have been carried out, for example:

- Bridge repair in Segagap Hamlet, Nanga Tayap Village.
- Fund assistance for accommodation for the repair of the Sebadak Raya road.
- Heavy equipment assistance for road repairs in Pangakalan Telok Village.
- Cooperative FFB production report
- Socialization of conservation areas / HCV areas
- RKL-RPL report every semester
- CSR reports.

3.4.2	Status : Non-Conformance number 2022.01 with minor category
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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 Collective Labor Agreement period 2019-2022 written in Bahasa. In general these procedures describe:

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

In addition to being publicly listed in Collective Labor Agreement, the certification unit has other procedures in the form of Policies, SOPs, Internal Memorandums and others related to recruitment, transfer, promotion, retirement, termination of employment and others. These procedures have been documented to all workers and their representatives. For example some procedures that are owned by the certification unit include:

- a. Procedure concerning Employee Recruitment
- b. Procedure concerning Employee Agreement
- c. Procedure regarding Employee Promotion & Transfer
- d. Procedure concerning Employee Ratings

Based on interviews with estate and mill workers at PT SISM and PT SMA note that workers have a sufficient understanding of the procedures related to recruitment, promotion, retirement and factors causing termination of employment. Workers explain that in the acceptance process carried out in accordance with the terms/ conditions according to ability/ expertise, promotion is based on an assessment of the performance of each employee each year, and one of the causes of termination of employment can occur if the worker has committed a serious violation. Based on this explanation, certification unit has explicitly state the indiscriminatory policy during the recruitment selection, hiring and promotion process

3.5.2

The certification unit shows the implementation documents for the 2022 employment procedure as follows:

1. Position Transfer Letter with No. 011/HRD-SMA/SK/II/2022 dated January 1, 2022. Employees with the initials SR were transferred from herbicide application to upkeep maintenance because they were pregnant. The mutation is effective from the date of stipulation.
2. Employee leave form with the initials ER applying for leave for 3 working days from July 28 to August 1, 2022 for family matters. The leave form has been approved by the operating unit on July 19, 2022.
3. Certificate of Maternity Leave with No. 044/PT.SISM/Klinik Central/04/2022 for employees with the initials ES. Maternity leave is given for 90 days from April 18, 2022 to July 18, 2022.
4. Employee retirement notification letter with No. 14/Ket.Pen/SISM/HRD/III/2022 dated March 8, 2022 for employees with the initials SW who have entered retirement age as of May 30, 2022.

Based on the above, it is known that the certification unit has good documentation regarding the implementation of labor procedures.

Status: Comply

3.6

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

3.6.1

The certification unit has carried out a risk assessment to identify Occupational Health & Safety issues in all operations, which are documented in the PT Sepanjang Intisurya Mulia Assessment for the 2022 period, which was approved by the Head of OHS Committee in January 2022. The document describes the type of work, potential hazards/ risks that will arise, effects and risk categories, as well as risk control. This assessment covers all hazards and risks in estate, such as herbicide application, fertilization, harvesting, slashing, landscaping, FFB loading, transportation, desilting, thinning & care, pest and disease control, warehouses and so on. Based on field observations and interviews with estate and mill workers, known that officers have understood the potential work risks and how to minimize these risks. The certification unit also shows the HIRAC document for the Mill unit which describes the results of hazard identification and its control in FFB weighing operations, loading ramp stations, sterilizer station operations, thresher stations, press station operations, boiler station operations and so on.

The certification unit demonstrates its mitigation plans and procedures through its OHS Policy document which explains that the certification unit is committed to providing a healthy, safe and conducive work environment for employees, contractors and visitors in carrying out activities, projects and programs across estate, mill and offices.

In addition, the certification unit has also established procedures to mitigate OHS problems in all operations, including SOPs for First Aid in Accidents and SOPs for Personal Protective Equipment. In addition, the certification unit has also prepared OHS Committee programs, such as regular OHS Committee meetings, HIRAC evaluations, employee periodical MCU, FR/ SR work accident data, OHS Committee quarterly reporting and others.

3.6.2

As part of its efforts to address OSH for employees, the certification unit has:

1. The HIRADC document was last updated January 2022. The document has detailed the potential hazards and precautions to be taken
2. SOP for Personal Protective Equipment (PPE) with No. SOP/SISM/SHE10 dated February 01, 2020. In the Distribution section (new distribution and replacement) of PPE it is explained that if the PPE is damaged before its life time, employees can exchange it with new PPE by bringing the damaged PPE
3. OHS inspection and monitoring carried out every month

However, based on the field observation and interviews, there are several managements that are considered ineffective, for example:

1. Inconsistent and uninformative marking of symbols and warnings in chemical warehouses and toxic and hazardous waste in estate and mill (size, potential hazards that have arisen and have begun to fade)
2. Availability/effectiveness of facilities and infrastructure in the event of an emergency such as sirens, eye washes, access to safe points, location of first aid kits either in estates or mills
3. Monitoring the use of PPE that has not been carried out thoroughly so that employees are found using damaged PPE or buying their own, for example:
 - a. The operator of the Mulia 3 Estate generator uses PPE types of shoes that have been damaged.
 - b. The Mulia Oil Mill loader operator uses PPE type shoes that have been damaged.
 - c. The Mulia Oil Mill boiler operator uses PPE type shoes that have been damaged.
 - d. The WTP Mulia Oil Mill operator uses PPE type shoes that have been damaged.
 - e. The employees of the Trimulaya Lestari Palm Oil Cooperative harvest use PPE type shoes by buying their own.
4. There are several unsafe work practices, for example, FFB loading employees are found sitting next to the tractor driver, tractor trailer, in front of the trailer or in the bucket backhoe loader.

In this regard, the auditor considers that the OHS management plan carried out has not been effective and comprehensive in all operating units. **Based on that's explanation raised Non-Conformity No 2022.02 with Major Category**

3.6.2	Status: Non-Conformity No 2022.02 with Major Category
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3.7

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

3.7.1

The certification unit has established the annual training program for each unit including scheme smallholders, out growers and contractors. The training program covers all operational and RSPO aspects, such as agronomic best practices, chemical/ pesticide handling, OSH, and the environment. Further explained that there is no gender discrimination in the program but based on the operational and previous evaluation.

The certification unit in this case shows the 2022 training program document which is based on an analysis of employee training needs. The training is carried out interactively by the trainer or supervisor through presentations and hands-on practice to increase participants' understanding. The training program covers the following aspects:

1. Training of toxic and hazardous waste, and chemical handling.
2. Harvest aspect training.
3. Integrated pest control training
4. Technical training of fertilization and spraying.
5. First aid kit training.
6. HCV training

Operators of Energy and Production Equipment

- a. *Permenaker No. 38 tahun 2016* concerning Energy and Production Equipment. In Table E it is explained that for prime movers with a capacity of > 214.47 HP it is mandatory to have 1 class II operator and 1 class I operator for each shift.
- b. The certification unit has 2 turbine engines with a capacity of 2000 kW/ 2680.96 HP and 1800 kW/ 2412.86 HP with 2 work shifts.
- c. The certification unit has 8 class II diesel motor operators but does not yet have an operator for turbine engines.

- d. The certification unit shows the OHS Long Term Training Plan document that informs the turbine operator training program planned for 2022 to 2024.
- e. The certification unit shows a letter from the Manpower and Transmigration Office of *UPT* Labor Supervision Region I regarding confirmation of registration for OHS operator training for turbine engines which is planned to be carried out on 1-3 September 2022.

Boiler Operator

- a. *Permenaker No. 1 tahun 1988* concerning qualifications and requirements for boiler operator. In Appendix 1 of Table 1 it is explained that for a machine with a steam capacity of > 80 tons/ hour, it is mandatory to have 3 operator class II and 2 operator class I.
- b. The certification unit has 2 boilers with a capacity of 90 tons/ hour with 2 work shifts.
- c. The certification unit has 4 operator class I but does not have operator class II.
- d. The certification unit shows the OHS Training Long-Term Plan document that informs the boiler operator training program planned for 2022 to 2024.
- e. The certification unit shows a letter from PT Global Safety (*PJK3*) regarding confirmation of registration for OHS operator training for boiler which is planned to be carried out on August 22-27 2022.

In this case, the certification unit has the opportunity to ensure the realization of OHS operator training for turbine and boiler in 2022 in accordance with the established program. **OFI**

3.7.2

The certification unit shows training documents to employees and the public around the 2021 period as follows:

1. Digital based fire reporting training which will be held on June 02, 2022. The socialization was attended by estate, mill and contractor employees. The certification unit can show documentation and attendance list for the socialization.
2. Training safety spraying which will be held on March 09, 2022. The socialization was attended by estate, mill and contractor employees. The certification unit can show documentation and attendance list for the socialization.
3. Training black bunch census which will be held on April 11, 2022. The socialization was attended by estate, mill and contractor employees. The certification unit can show documentation and attendance list for the socialization.
4. Discipline and Physical Health of Security Personnel which will be held on February 23, 2022. The socialization was attended by estate, mill and contractor employees. The certification unit can show documentation and attendance list for the socialization.
5. LSU training which will be held on January 06, 2022. The socialization was attended by estate, mill and contractor employees. The certification unit can show documentation and attendance list for the socialization.

Based interviews with management revealed that the certification unit compiled a training program based on work units, for example training on spray techniques and poisoning prevention for pesticide applicators which was carried out every month.

Based on field observations and interviews with estate and mill employees show that the certification unit always provides regular training to employees to maintain and improve employee competencies in their respective jobs.

3.7.3

Training Program 2022 is available including RSPO Supply Chain. Actual training for RSPO Supply Chain in 2022 conducted on 18 – 19 January 2022 2022. The training subjected to SOP of Supply Chain and Traceability of Palm products. Training attended by relevant personnel including Mill Manager, Office Assistant, Field Assistant, weighbridge clerk, production clerk and security.

Based on interview to the workers involved in SCCS operations, such as security (for FFB receiving verification), weighbridge operator (for dividing amount of certified and uncertified sourced), and Administration Head (for recording and monitoring the MB data), known that the workers understood the SCCS mechanism, and the MB record has conducted and monitored well

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1; 3.8.2

the Mill implements the MB Module, which is received both FFB from certified and uncertified sources. Verification of Mass Balance record, the Mill has been recorded well the FFB and products (CPO and PK) from certified and uncertified sources. The Mill only claims certified products from certified sources.

3.8.3

The estimate production of FFB, CSPO, and CSPK for next 12 month is:

Item	License volume (Tonnes) Including Extension Volume April 10 th 2021 – August 2022	Actual production (November 2020 – June 2022)	Estimate Production of 12 month (MT) further
FFB	528,763	456,762.66	288,000
CSPO	120,127	102,127.27	65,520
CPK	19,941	16,941.54	10,800

Since the last period of assessment MOM applied scenario 4 in accordance with RSPO Contingency Audit Procedures and there is no new license, since issued after ASA 1 there is no new license since the expired period, palm trace id of MOM extended every three months since the license expired and the volume of certified products will be added according to the request of the certification unit. During period of 2021 and 2022 there are several additional RSPO Product as follows:

Dated	Additional Volume (MT)			
	FFB Estate	FFB scheme or associated	CSPO	CSPK
22 July 2021	44700	9800	12000	2300
22 October 2021	64000	16000	18000	2700
21 January 2022	62500	7200	15,000	3000
27 April 2022	67200	16800	18000	2700
26 July 2022	123,411	30,852	37,127	6141

3.8.4

Mulia POM has met the requirement regarding to the reporting of its supply chain, as it has been registered as RSPO member and on RSPO IT Platform:

Sub License ID	CB116933
Member Name	Mulia Oil Mill
Member ID	RSPO_PO1000004458
RSPO Membership Number	1-0086-06-000-00
Issued On	10-04-2021
Issued By	PT Mutuagung Lestari
Status	Active

All transaction has been announced to RSPO IT Platform and confirmed shipped. During license it was known there is product sold as RSPO certified and non-certified/conventional as described in indicator 3.8.8 and 3.8.16. The company has been removed of certified stock for products sold as another scheme.

3.8.5

Mulia POM has a procedure for implementing RSPO SCCS, which are explained in the document SOP/GPN/32, revision 2 issued on 01 February 2022 which covers supply chain, traceability and mass-balance. The SOP has explained the elements of implementing SCCS, including:

- Key personnel and their duties and responsibilities:
 - Weigh bridge operators: check and ensure FFB DO (from certified suppliers must be stamped with a valid RSPO, deliver sustainable products based on contract in the Microsoft Dynamic System and put a valid RSPO stamp for product delivery documents in accordance with the contract.
 - Head of administration: coordinate sustainable product shipments, mass balance updates based on data from SMD according to sustainable and unsustainable categories, examine available contracts for sustainable products,

- coordinate and monitor product shipments, ensure RSPO requirements are met, carry out relevant monitoring and reconciliation at the end of every month, ensure that product delivery documents contain the required information
- Assistant and mill manager: obtain weekly and monthly FFB estimates, provide input regarding estimated CPO and PK production
- Palm product marketing department: make sales according to product categories, conduct sales procedures, provide information to the mill according to the sales contract
- Sustainability
- Sustainability Dept.: provides a valid RSPO stamp
- MB requirements - Supply chain models: preparation of mass balance reports, product shipments from positive stock, information on production that exceeds to CB, reporting through RSPO IT Platform
- Annual SCCS training (refreshment)

The procedures established and covering all elements of the supply chain model requirements, records, and reports of compliance with supply chain requirements including training records. The procedure is according to RSPO P&C 2018. 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 provided SCCS training and able to demonstrate awareness of the procedures related SCCS implementation.

3.8.6

The SOP of SCCS audit activities is explained in Internal Audit (No. SOP/SISM/SSTA03, dated February 1st 2020), the audit is carried out by a designated and trained team. The procedure informs about:

- Company done internal audit once a year.
- Management representative create a program audit and evaluate every year.
- Audit based on RSPO SCCS principle and criteria.
- Record of report maintained by internal auditor.
- Result of audit will be basis for management review.

The latest internal audit for SCCS was conducted on 15 – 22 March 2022. Management review for the internal audit conducted on April 2022. The management review discuss about the result of internal audit has been closed and other changes to management system and recommendation for improvement.

3.8.7

Mulia POM has record the production of FFB received from certified and noncertified source. Below is the detail of FFB received for November 2020 – June 2022

November 2020 - December 2020			
Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Nov-20	24,469.43	12,402.88	36,872.31
Dec-20	24,720.35	11,157.22	35,877.57
Total	49,189.78	23,560.10	72,749.88
January - December 2021			
Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Jan-21	22,519.62	3,664.10	26,183.72
Feb-21	22,138.79	3,592.30	25,731.09
Mar-21	26,017.62	4,371.22	30,388.84
Apr-21	25,922.48	4,577.10	30,499.58
May-21	23,496.85	3,797.48	27,294.33
Jun-21	23,983.91	3,988.08	27,971.99
Jul-21	23,063.06	3,950.05	27,013.11
Aug-21	23,883.30	4,417.33	28,300.63

Sep-21	22,398.85	4,180.36	26,579.21
Oct-21	19,878.41	3,970.63	23,849.04
Nov-21	20,484.24	4,406.45	24,890.69
Dec-21	19,323.21	4,148.57	23,471.78
Total	273,110.34	49,063.67	322,174.01
January – June 2022			
Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Jan-22	19,384.71	4,541.29	23,926.00
Feb-22	17,815.66	3,879.42	21,695.08
Mar-22	23,413.73	4,933.03	28,346.76
Apr-22	24,040.95	4,513.58	28,554.53
May-22	20,488.03	4,327.92	24,815.95
Jun-22	26,319.46	4,965.76	31,285.22
Total	131,462.54	27,161.00	158,623.54
Grand Total	453,762.66	99,784.77	553,547.43

Estimated certified product recorded in the last assessment report and certificate, as well as in the RSPO IT Platform. Actual certified produced has been verified during this assessment, and not exceed the estimate. The estimates of certified production for the next license period also have been set, in reasonable amount considering the last year's production. The data are shown in the following table:

Item	License volume (Tonnes) Including Extension Volume April 10 th 2021 – August 2022	Actual production (November 2020 – June 2022)	Estimate Production of 12 month (MT) further
FFB	528,763	456,762.66	288,000.00
CSPO	120,127	102,127.27	65,520.00
CPK	19,941	16,941.54	10,800.00

Since the last period of assessment MOM applied scenario 4 in accordance with RSPO Contingency Audit Procedures and there is no new license, since issued after ASA 1 there is no new license since the expired period, palm trace id of MOM extended every three months since the license expired and the volume of certified products will be added according to the request of the certification unit. During period of 2021 and 2022 there are several additional RSPO Product as follows:

Dated	Additional Volume (MT)			
	FFB Estate	FFB scheme or associated	CSPO	CSPK
22 July 2021	44700	9800	12000	2300
22 October 2021	64000	16,000	18000	2700
21 January 2022	62500	7200	15,000	3000
27 April 2022	67200	16800	18000	2700

3.8.8

Documentation for the Sustainable Certified Product (CSPO and CSPK) consists of a daily record of the FFB acceptance, a daily record of certified production, which is classified as the CSPO and CSPK, a sales record, a stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation. Based on documents verifications and interviews with management units obtained information since November 2020 to June 2022 there are **59,500.33** MT CSPO and **7,608.12** CSPK sold as certified products and there are **39,619.99** MT CSPO and **9,615.74** CSPK sold as conventional

Documents verification and interview during an audit it was known the claimed RSPO product of CSPO and CSPK is no longer than 3 months since the product delivered. Those documents cover information's of delivery date, description of product and supply chain model, product quantity, identification number, certificate number, sender's name, and address of the seller, for example:

1. CSPK
 - Shipping Announcement for CSPK volume 203.56 MT dated 19 July 2022, with transaction TR-c9faac0a-3878, shipping date on June 2022 with buyer PT Wilmar Cahaya Indonesia - Pontianak, the mill can presented supporting documents in example
 1. Sales Contract No SPSIM/PK/2206/04 dated 23 June 2022, with product CSPK RSPOK MB
 2. Delivery Order Document No SPSIM/PK/2206/04 with the product PK RSPO MB and the shipping period 28 June – 15 July 2022
2. CSPO
 - Shipping Announcement for CSPO volume 2,995.53 MT dated 11 June 2022, with transaction TR-deb1ca29-91b3, shipping date on May 2022 with buyer PT PT Sukajadi Sawit Mekar – Bagendang, the mill can presented supporting documents in example
 1. Sales Contract No 018/KJB/SSM-SISM/IV/2022, with product CSPO RSPO MB
 2. Delivery Order Document No SPSIM/CSPO/2204/03 with the product CSPO RSPO MB and the shipping period 16 – 30 May 2022

Furthermore, the unit of certification can present document related claim product such as delivery order and weighbridge slip that informed CSPO products that sold.

since last onsite assessment it was known there were **39,619.99** MT CSPO and **9,615.74** CSPK sold as conventional. For CSPO sold as conventional during this period has been removed from certified stock. The unit of certification can present removing allocated product from palm trace, based on documents and verification through RSPO IT Platform, as presented table below:

Stock Transaction ID	Date	Product	Supply Chain Model	Transaction Type	Volume
ST-TR-3bcac339-c6d3	23-07-2021	CSPO	Mass Balance	Remove From Certified Stock	5,972.42
ST-TR-65431ecd-fcb5	23-07-2021	CSPK	Mass Balance	Remove From Certified Stock	2,334.24
ST-TR-ced79978-10e6	21-10-2021	CSPO	Mass Balance	Remove From Certified Stock	8,743.49
ST-TR-760302b4-1343	21-10-2021	CSPK	Mass Balance	Remove From Certified Stock	1,394.9
ST-TR-667b80f7-82ea	25-01-2022	CSPK	Mass Balance	Remove From Certified Stock	635.41

**Volume in MT*

3.8.9, 3.8.10

The physically handling of product are conducted by mill itself since FFB receive in grading station and processed to CPO and PK, except the transportation of product are sourced to third party, which bonded by the agreement. The product is legally owned by the mill since it produced and delivered to specific buyer, and / or the product shipped from bulking. The contractors have been bound in a work agreement, for example work agreement with PT Ponti Sarana Utama (No. SISM.PSU//2021/05)) valid till 31 December 2022

The list of contractors of CPO and PK transporter for Mulia Oil Mill are:

- PT Talenta Lestari Abadi
- PT Ponti Sarana Utama
- Koperasi Sawit Tri Mulia Lestari
- Koperasi Sawit Harapan Jaya
- Koperasi Sawit Panca Mitra Abadi

Mulia POM uses third party for CPO and PK transportation. POM showed list of contractor and example of work agreement for CPO and PK transportation. Based on the list, there are 5 contractors to transport the CPO and PK from mill to buyer. The work

agreement between PT SISM and contractor include the clause about the outsourcing process as ruled in RSPO SCCS indicators. Based on interview with CPO and PK Transporter (Koperasi Tri Mulia Lestari) it was known they willing to interview about SCCS process in the term of CPO transportation, the transportations of RSPO certified products etc.

3.8.11

There are 5 contractors to transport the CPO and PK from mill to buyer. There are no additional contractor from previous assessment.

3.8.12

All records of the RSPO SCCS requirements are updated and can be accessed by the auditor, all records are kept in the factory office. In accordance with company SOPs, document retention is carried out for 10 years. Below is the record of production and selling of CPO and PK from November 2020 – June 2022

CPO

November – December 2020					
Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)	
	Cert	Non Cert		RSPO	Conventional
opening stock	1,119.66	2,258.77	3,378.43		
Nov-20	5,455.48	2,762.92	8,218.40	-	2,948.95
Dec-20	5,526.92	2,498.86	8,025.78	3,507.28	4,522.04
Total	12,102.06	7,520.55	19,622.61	3,507.28	7,470.99
Closing stock 2020	1,123.79	-	1,123.79		
January – December 2021					
Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)	
	Cert	Non Cert		RSPO	Conventional
opening stock	1,123.79	-	1,123.79		
Jan-21	4,842.77	799.05	5,641.82		2,864.01
Feb-21	5,094.12	826.56	5,920.68		3,785.65
Mar-21	6,088.50	1,021.43	7,109.93	2,989.35	5,371.41
Subtotal	17,149.18	2,647.04	19,796.22	2,989.35	12,021.07
Stock	2,138.76		2,138.76		
Apr-21	5,924.62	1,045.72	6,970.34	5,308.66	144.40
May-21	5,196.29	840.77	6,037.06	2,998.68	2,566.38
Jun-21	5,402.35	897.47	6,299.82	3,501.37	3,261.64
Subtotal	18,662.02	2,783.96	21,445.98	11,808.71	5,972.42
Stock	880.89		880.89		
Jul-21	5,070.91	867.82	5,938.73	1,001.79	2,307.11
Aug-21	5,382.92	991.50	6,374.41	3,793.13	1,580.58
Sep-21	4,991.34	931.59	5,922.93	1,705.78	4,855.81
Subtotal	16,326.05	2,790.91	19,116.96	6,500.70	8,743.49
Stock	1,081.86		1,081.86		
Oct-21	4,459.92	891.26	5,351.18	3,298.79	322.69
Nov-21	4,615.57	990.30	5,605.87	4,700.90	
Dec-21	4,279.22	918.86	5,198.08	2,203.80	2,913.96
Subtotal	14,436.58	2,800.41	17,236.99	10,203.49	3,236.65

Stock	996.44		996.44		
Total	61,348.53	11,022.32	72,370.85	31,502.25	29,973.63
January - June 2022					
Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)	
	Cert	Non Cert		RSPO	Conventional
opening stock	996.44	0.00	996.44		
Jan-22	4,432.87	900.15	5333.02	0.00	2175.37
Feb-22	4,187.20	901.04	5088.23	2634.67	
Mar-22	5,455.30	1153.74	6609.04	8463.64	
Subtotal	15,071.81	2954.93	18026.73	11098.31	2175.37
Stock	1,798.13	2054.77	3852.90		
Apr-22	5,557.68	1058.62	6616.29	8197.73	
May-22	4,362.14	907.38	5269.52	5194.76	
Jun-22	5,801.16	1111.20	6912.36	0.00	
Subtotal	17,519.10	5131.97	22651.07	13392.49	0.00
Total	29,796.34	6032.12	35828.46	24490.80	2175.37
Grand Total	103,247.02	24574.99	127821.92	59,500.33	39,619.99

PK

November – December 2020					
Period	CSPK production (MT)		Total	Cert PK Dispatch (MT)	
	Cert	Non Cert		RSPO	Conventional
opening stock	362.02	-	362.02		
Nov-20	976.16	494.76	1,470.92		996.12
Dec-20	837.32	378.58	1,215.90		927.94
Total	2,175.51	873.33	3,048.84	-	1,924.07
January – December 2021					
Period	CSPK production (MT)		Total	Cert PK Dispatch (MT)	
	Cert	Non Cert		RSPO	Conventional
opening stock	251.44		251.44		
Jan-21	840.06	138.61	978.67		832.39
Feb-21	822.69	133.49	956.18		851.53
Mar-21	974.43	163.48	1,137.91		958.03
Subtotal	2,888.63	435.57	3,324.20		2,641.96
Stock	246.67		246.67		
Apr-21	997.75	176.11	1,173.86		986.17
May-21	832.44	134.69	967.13		826.13
Jun-21	829.45	137.79	967.24	350.71	521.94
Subtotal	2,906.31	448.59	3,354.90	350.71	2,334.24
Stock	221.36		221.36		

Jul-21	855.17	146.35	1,001.52	399.63	410.55
Aug-21	1,003.36	185.47	1,188.82	727.59	348.06
Sep-21	891.06	166.34	1,057.40	298.22	636.30
Subtotal	2,970.94	498.16	3,469.10	1,425.44	1,394.90
Stock	150.60		150.60		
Oct-21	805.00	159.78	964.78	821.38	
Nov-21	853.39	182.66	1,036.05	351.06	418.35
Dec-21	776.11	166.65	942.76	545.17	217.07
Subtotal	2,585.09	509.09	3,094.19	1,717.61	635.42
Stock	232.07				
Total	10,480.91	1,891.41	12,372.32	3,493.76	7,006.52
January - June 2022					
Period	PK production (MT)		Total	Cert PK Dispatch (MT)	
	Cert	Non Cert		RSPO	Conventional
opening stock	232.07	0.00	232.07		
Jan-22	733.63	171.70	905.33	553.51	94.52
Feb-22	688.97	150.40	839.37	680.46	202.86
Mar-22	855.21	180.23	1,035.44	717.53	173.03
Subtotal	2,509.88	502.33	3,012.21	1,951.50	470.41
Stock	87.97		87.97		
Apr-22	860.35	161.86	1022.21	753.17	37.94
May-22	641.99	135.47	777.46	674.71	
Jun-22	866.98	164.25	1031.23	734.98	176.80
Subtotal	2,457.29	461.57	2,918.87	2,162.86	214.74
Grand Total	17,303.56	3,728.64	2,1032.20	7,608.12	9,615.74

Based on table above, can be summarized as table below:

a. Tonnage Product

Description	Volume (MT)
Certified FFB	456,762.66
CSPO Production	102,127.27
CSPK Production	16,941.54

b. Product Selling

Description	Volume (MT)
CSPO sold as RSPO certified product	59,500.33
CSPK sold as RSPO certified product	7,608.12
CSPO sold under another scheme	0
CSPK sold under another scheme	0
CSPO sold as conventional	39,619.99

CSPK sold as conventional	9,615.74
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3.8.13 and 3.8.14

Based on document verifications and interview with management it was known if there is no conversion rate of production of CPO (OER) and PK (KER) that applied by the mill. The production of CPO (OER) and PK (KER) are based on actual daily, monthly, and yearly production.

3.8.15

Mulia POM implements supply chain with Mass Balance module, because received FFB from certified and uncertified source. POM has documented the record of certified and noncertified FFB received. It has described in indicator 3.8.7.

3.8.16

Documentation for the Sustainable Certified Product (CSPO and CSPK) consists of a daily record of the FFB acceptance, a daily record of certified production, which is classified as the CSPO and CSPK, a sales record, a stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation. Based on documents verifications and interviews with management units obtained information since November 2020 to June 2022 there are **59,500.33** MT CSPO and **7,608.12** CSPK sold as certified products and there are **39,619.99** MT CSPO and **9,615.74** CSPK sold as conventional

Documents verification and interview during an audit it was known the claimed RSPO product of CSPO and CSPK is no longer than 3 months since the product delivered. Those documents cover information's of delivery date, description of product and supply chain model, product quantity, identification number, certificate number, sender's name, and address of the seller, for example:

1. CSPK
 - Shipping Announcement for CSPK volume 203.56 MT dated 19 July 2022, with transaction TR-c9faac0a-3878, shipping date on June 2022 with buyer PT Wilmar Cahaya Indonesia - Pontianak, the mill can presented supporting documents in example
 1. Sales Contract No SPSIM/PK/2206/04 dated 23 June 2022, with product CSPK RSPOK MB
 2. Delivery Order Document No SPSIM/PK/2206/04 with the product PK RSPO MB and the shipping period 28 June – 15 July 2022
2. CSPO
 - Shipping Announcement for CSPO volume 2,995.53 MT dated 11 June 2022, with transaction TR-deb1ca29-91b3, shipping date on May 2022 with buyer PT PT Sukajadi Sawit Mekar – Bagendang, the mill can present supporting documents in example
 1. Sales Contract No 018/KJB/SSM-SISM/IV/2022, with product CSPO RSPO MB
 2. Delivery Order Document No SPSIM/CSPO/2204/03 with the product CSPO RSPO MB and the shipping period 16 – 30 May 2022

Furthermore, the unit of certification can present document related claim product such as delivery order and weighbridge slip that informed CSPO products that sold.

since last onsite assessment it was known there were **39,619.99** MT CSPO and **9,615.74** CSPK sold as conventional. For CSPO sold as conventional during this period has been removed from certified stock. The unit of certification can present removing allocated product from palm trace, based on documents and verification through RSPO IT Platform, as presented table below:

Stock Transaction ID	Date	Product	Supply Chain Model	Transaction Type	Volume
ST-TR-3bcac339-c6d3	23-07-2021	CSPO	Mass Balance	Remove From Certified Stock	5,972.42
ST-TR-65431ecd-fcb5	23-07-2021	CSPK	Mass Balance	Remove From Certified Stock	2,334.24
ST-TR-ced79978-10e6	21-10-2021	CSPO	Mass Balance	Remove From Certified Stock	8,743.49
ST-TR-760302b4-1343	21-10-2021	CSPK	Mass Balance	Remove From Certified Stock	1,394.9
ST-TR-667b80f7-82ea	25-01-2022	CSPK	Mass Balance	Remove From Certified Stock	635.41

*Volume in MT

3.8.17

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

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

The certification unit has a commitment to respecting human rights and describe in the Social Policy Genting Plantation in November 2015 using Bahasa. The commitment of the certification unit in respecting human rights has been quite well implemented in the absence of issues and incidents of human rights violations that occurred in the operational area of plantations and factories. This is evidenced by statements from plantation workers (harvesters, sprayers and maintenance), factories (mill operators and warehouse workers) as well as contract workers who state that so far there have been no incidents or issues of human rights violations occurring in the operational area of the certification unit.

Based on the explanation above, during the past year there were no issues / incidents of human rights violations that occurred in the vicinity or the operational area of the certification unit so that there were no acts of intimidation / violence carried out by the certification unit including contracted services such as security services that were contracted and others.

4.1.2

During the past year, the certification unit did not have records related to the use of violence / mercenaries or paramilitaries in resolving conflicts / problems that existed between the certification unit and related stakeholders (surrounding communities, workers, or others).

As ruled in Ministry of Industry Regulation No 18 year 2018. palm oil plantation categorized as National Vital Object, the company ordered the police to maintain conditions and security where there are five (5) police in the company area. Based on public consultation with the management and local company obtained information if the existence of the police in company is to maintain the conditions and security in the company area, not as an effort to intimidate or force the community around the company.

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

Certification unit already have Complaints SOP with document number SISM-HRD-04-00.00 dated December 1, 2013 and authorized by the Group Manager. The procedure informs about:

- a. Indirect delivery (by mail). Each complaint must be submitted in writing using the complaint form or Documentation of Grievance Form (SISM-HRD-04-01.00)
- b. Direct delivery. Employees who wish to submit a complaint to the party or their supervisor are also required to fill out a complaint form or Documentation of Grievance Form.
- c. Bipartite Settlement (SISM-HRD-04-05.00).
- d. If an employee feels that the answer to his complaint is unsatisfactory or that his employer is considered negligent in responding to the complaint within the specified time and the employee submits an objection, the HR manager is obliged to settle it bipartite and call the employee in writing.

The procedure aims to provide assurance to whistleblowers who have a good will to report suspected abuse or divergent practices. Whistleblowers will be protected from retaliation or actions that may harm the whistleblower. Furthermore, regarding Confidentiality, it is explained that the certification unit encourages the whistleblower to write a clear and complete identity when reporting irregularities that occur. All forms of reporting irregularities will be guaranteed confidentiality by the certification unit. If the complaint cannot be resolved by consultation, it can follow up the next step or go through the process to the RSPO.

The certification unit already has officers who are responsible for handling complaints so that they continue to get further information related to the progress of complaint resolution, in this case the Assistant Public Relations/ CSR. The procedure also explained that the response time related to complaints was 2 weeks after the complaint was submitted.

Based on interview with community representatives known that during land acquisition process, all villager (land-owner) are free to deliver their comments or objection regarding to land acquisition process.

4.2.2

Based on interview with Statutory Bodies in Ketapang Regency (Environment Agency and Manpower & Transmigration Agency), it is known that they understand how to communicate and consult with certification unit. However, based on interviews with representatives of surrounding communities, the community has known about the communication procedures and to people who served as communicators between the certification unit and community so that people who cannot read/ write can be informed by the related communicators.

The procedure has been socialized to estate and mill workers as well as to the surrounding community on November 18, 2021. Certification units can show the minutes and attendance lists for the socialization.

4.2.3

Based on verification of the internal and external complaint book documents for 2021-2022 it is known that there were complaints with the following explanation:

- a. Employee complaints book for the period 2021-2022, where on June 16, 2022 there were complaints related to electricity in housing that often went out and water often didn't flow. The certification unit in this case followed up on the complaint by making improvements on June 18, 2022 and it was declared complete.
- b. Employee complaints book for the period 2021-2022, where on April 11, 2022 there were complaints related to unpaid employee leave. The certification unit in this case responds to the complaint by showing that there is no remaining leave entitlement for the employee.

4.2.4

The procedure aims to provide assurance to whistleblowers who have a good will to report suspected abuse or divergent practices. Whistleblowers will be protected from retaliation or actions that may harm the whistleblower. Furthermore, regarding Confidentiality, it is explained that the certification unit encourages the whistleblower to write a clear and complete identity when reporting irregularities that occur. All forms of reporting irregularities will be guaranteed confidentiality by the certification unit. If the complaint cannot be resolved by consultation, it can follow up the next step or go through the process to the RSPO.

The certification unit already has officers who are responsible for handling complaints so that they continue to get further information related to the progress of complaint resolution, in this case the Assistant Public Relations/ CSR. The procedure also explained that the response time related to complaints was 2 weeks after the complaint was submitted.

Status: Comply

4.3

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

4.3.1

The results of interviews with management, conveyed that the CSR program was prepared based on the participation of the surrounding community, included in the activity village council "MUSREMBANG" year 2021. The activity involved nearest community included the Village Heads around the company, such as Mensubang Village, Pangkalan Teluk Village, Bayangan village, Tanjung Medandan Village (PT SMA) and Sepakat Jaya village, Pangkalan Suka, Mensubang and Pangkalan Elok village (PT SISM)

From the results of meetings with the community 2021, a CSR program was prepared in 2022. For the CSR program in 2022, the company arranged a CSR program in the fields of Economy, Environment, Education, and social culture. The company has also shown the CSR realization record to the communities 2022. For example:

- Bridge repair in Nanga Tayap Village.
- Fund assistance for accommodation for the repair of the Sebadak Raya road.

- Heavy equipment assistance for road repairs in Pangakalan Telok Village
- The assistance for teacher salaries in the village of Pangakalan telok, Mensubang, and Tanjung Medan village.
- The assistance in purchasing water reservoirs and water pumps in Pangakalan Telok village.

The results of interviews with representative of village revealed that the company regularly village council "MUSREMBANG". From the interview results, it was conveyed that the company had provided CSR assistance to the surrounding community in accordance with the identification needs.

Status: Comply

4.4

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

4.4.1

PT Sepanjang Intisurya Mulia and PT Sawit Mitra Abadi have own land use title and land building title for their entire area with total area 22,935.70 Ha, that consist of:

- HGU Certificate No 33 dated 28 September 2007 valid until 27 September 2037 for an area 14,255.68 Ha on behalf of PT Sepanjang Intisurya Mulia. This land title issued based on decree from Head of National Land Agency the Republic of Indonesia No 43-HGU-BPN RI-2007, tanggal dated 19 September 2007
- HGU Certificate No 39 dated 24 January 2011 valid until 17 January 2024 for an area 100 Ha on behalf of PT Sepanjang Intisurya Mulia. This land title issued based on decree from Head of National Land Agency the Republic of Indonesia 01/HGU/BPN.61/2010, dated 1 December 2010
- HGU Certificate No 148 dated 11 November 2016 valid until 15 August 2051 for an area 199.31 Ha on Behalf of PT Sepanjang Intisurya Mulia. This land title issued based on decree from Head of Land Office Kalimantan Barat Province No. 05/HGU/BPN.61/2016 tanggal 15 Agustus 2016.
- HGB Certificate No 01 dated 30 January 2013 valid uttill 04 December 2032 for an area 5.57 Ha on behalf of PT Sepanjang Intisurya Mulia, This land title issued based on decree from Head of Land Office Kalimantan Barat Province No 07/HGB/BPN.61/2012
- HGU Certificate No 37 dated .15 October 2009 valid until 13 October 2044 for an area 8375.13 Ha on behalf of PT Sawit Mitra Abadi. This land title issued based on decree from Head of National Land Agency the Republic of Indonesia No. 127/HGU/BPN RI/2009, dated 9 September 2009

From the total HGU and HGB there is area covering 299.31 Ha was excluded from certification scope due to HCV assessment and this area also fall in occupation area and the total certification scope is 22,635.39 Ha

PT Sepanjang Intisurya Mulia and PT Sawit Mitra Abadi also have own plantation business permit (IUP). IUP of PT SISM issued of Ketapang Regent in accordance with Decree Letter No. 518/DISBUN – D/2015 dated July 29, 2015 and IUP of PT SMA issued of Ketapang Regent in accordance with Decree Letter No. 519/Disbun-D/2015 dated July 29, 2015 and Decree Letter No. 377/DPMPTSP-D.B/2019 related to change of land area of PT SMA.

4.4.3

There is no change / new development in the area of PT SISM and PT SMA. The latest and compensation process was carried out in 2010. Land map is documented together in the documents of land compensation wher its has been known and agreed by the land owner.

4.4.2, 4.4.4, 4.4.5, 4.4.6

As a guidance for land acquisition, there are SOPs for Land Dispute Resolution Mechanisms (document No.: SISM-CDP-02.00.00) and SOPs for Free, Prior and Informed Consent (KBDD or FPIC), No. Document: SISM-CD-01.00.00, effective as of 1 May 2015. There was several step regarding to FPIC as follows:

- Identification of land owners and customary rights
- Identification and engagement with village representative bodies
- Provision of information
- Negotiation process and agreement
- Documentation of the agreement
- Monitoring of agreement

- Conflict resolution mechanism
- Improvement verification

Based on interviews with communities, it was explained that the certificate holder entirely from private land ownership of the community and compensation had been made for the land. The previous landowner explained that the compensation process was carried out without coercion and compensation process has been held with transparent regarding the mutual agreement. The whole area managed by the company has been compensated. The compensation process involved all community witnessed also by the Village Head, Sub-district head, and other relevant parties. Records of land compensation process consist of document of land identification and inventory, land location maps, statement of the release of land rights by the owner, Receipt of Payment, Minutes of compensation/Compensation, and witnesses. This is stored in their respective estate according to the location of the land. Its in line with sample of land compensation that verified by auditor, in example land compensation on behalf of Sidi dated 28 June 2009. The land compensation document sign by both parties and witnessed by village head and district head

Status: Comply

4.5

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

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

There has been no new development and planting by PT SISM and PT SMA since ASA 2. Total area under management of the company since ASA 1 is 14,261 ha for PT SISM and 8,374.13 ha for PT SMA. For now, there is still an occupied area of 1,250 ha and there are no new developments related to land compensation. Based on explanations from representatives of the surrounding community, it is known that the process is still in agreement with the price that has not been reached.

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 – 4.6.3

As a guidance for land acquisition, there are SOPs for Land Dispute Resolution Mechanisms (document No.: SISM-CDP-02.00.00) and SOPs for Free, Prior and Informed Consent (KBDD or FPIC), No. Document: SISM-CD-01.00.00, effective as of 1 May 2015.

There was several step regarding to FPIC as follows:

- Identification of land owners and customary rights
- Identification and engagement with village representative bodies
- Provision of information
- Negotiation process and agreement
- Documentation of the agreement
- Monitoring of agreement
- Conflict resolution mechanism
- Improvement verification

Based on interviews with communities, it was explained that the certificate holder entirely from private land ownership of the community and compensation had been made for the land. The previous landowner explained that the compensation process was carried out without coercion and compensation process has been held with transparent regarding the mutual agreement. The whole area managed by the company has been compensated. The compensation process involved all community witnessed also by the Village Head, Sub-district head, and other relevant parties. Records of land compensation process consist of document of land identification and inventory, land location maps, statement of the release of land rights by the owner, Receipt of Payment, Minutes of compensation/Compensation, and witnesses. This is stored in their respective estate according to the location of the land.

4.6.4

Based on sample of land acquisition documentation and consultation with Villages Officials, it was known that the land acquisition has been made before FPIC concept available. However, based on land acquisition documents, interviews with managements as well as village head it can be concluded that the land acquisition processes had been conducted in FPIC manner. For instance,

the documentations shown had been made in Indonesian language and available for both parties, based on the agreed price and no coercion, involved, and signed by community representatives such as boundary lands-owner, Village Heads, and Sub-District Heads. Furthermore the unit of certification can presented that there are **equal opportunities both men and women during land compensation**.

There's evidence related to same opportunities for woman to have a land rights, for example, in the Document of Participating Farmers in Partnership, Members of the Sawit Harapan Jaya Plantation Cooperative, Nanga Tayap District, it is known that there are cooperative members from women representatives. For example, on behalf of Rosnira (No. 10601) and Seniwati (No. 10611) who are members of the Harapan Jaya Palm Plantation Cooperative. From this evidence, it is known that farmers have equal opportunities for both men and women in land ownership.

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

As a guidance for land acquisition, there are SOPs for Land Dispute Resolution Mechanisms (document No.: SISM-CDP-02.00.00) and SOPs for Free, Prior and Informed Consent (KBDD or FPIC), No. Document: SISM-CD-01.00.00, effective as of 1 May 2015. There was several step regarding to FPIC as follows:

- Identification of landowners and customary rights
- Identification and engagement with village representative bodies
- Provision of information
- Negotiation process and agreement
- Documentation of the agreement
- Monitoring of agreement
- Conflict resolution mechanism
- Improvement verification

There has been no new development and planting by PT SISM and PT SMA since ASA 1. The total area under management of the company since ASA 1 is 14,261 ha for PT SISM and 8,374.13 ha for PT SMA. For now, there is still an occupied area of 1250.76 ha and there are no new developments related to land compensation. Based on explanations from representatives of the surrounding community, it is known that the process is still in agreement with the price that has not been reached.

Interview results with landowners found that he has free access to information regarding the impacts of the palm oil plantation project. There were a long communication and discussion between community representatives, the government, and the company during the project preparation. Furthermore, they stated that Company never conducted any intimidation/coercion and never use paramilitary during the negotiation process. They have enough time to negotiate and meet the decision to become part of palm oil plantation development. The process has been made in Bahasa, Local Language, and provided by participatory mapping.

4.7.3

In addition, as part of the company's development, the company has also developed palm oil plantations for the community through a smallholder scheme. The development of the smallholder scheme is one of the company's efforts so that the community around the company can benefit from the company's existence. In addition, to facilitate community access, the company has opened and built access roads to the community, where there are several access roads that cross the company connecting the surrounding villages/hamlets. With the existence of this access road, it is easier to access from villages / hamlets that were previously via the river, now can pass through the company's access road. this information has been verified through public consultation with village head and government agency as well as workers who still live around the company

Status: Comply

4.8

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

4.8.1 – 4.8.4

During audit process based on documents review, interview with management as well as public consultation it was known there are several land issue in the certification units, among others

1. Occupation Area

Based on document it was known there are occupation area in the certification unit covering 1,250.76 Ha. Based on interview with managements its due to the landowner not willing to be compensated. For areas that are currently still controlled by the community (occupational area) and have never been compensated the company respects the existence and didn't force to give the land to the company. The area was clearly bounded by roads and ditches.

2. Land issue from Sepakat Jaya Villagers

There is a letter from the Village head of Sepakat Jaya on 14 June 2022 regarding the report from villagers (initial H) about the land issue who expect the presence of the company on 17 June 2022 at the village office to discuss that issue. Based on the minutes of the meeting It was known next meeting will be carried out in the company office and facilitated by the company by presenting supporting data. during the audit the company can show compensation related to the disputed area. However, the follow-up meeting has not yet been carried out

3. Land issue from Pangkalan Teluk Villagers

This land issue began in 2018, for an area of 6.5 ha in Estate Abadi 3. This problem was resolved by deliberation on 21 May 2022

4. Land Issue from Bayangan Villagers

There are people who claim an area of 1000 hectares in Bayangan Hamlet. the company stated that the area was compensated in 2013. the meeting was held on 07 June 2022.

As a guidance to resolved land dispute ruled in the land dispute settlement mechanism (SISM-CDP-02-00.00 dated 01 December 2013). The procedure described the provisions for the implementation of the land dispute settlement mechanism in the company operational area by referring to deliberation for consensus

The results of the document review show that meetings related to land issues always involve the village government

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1

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

5.1.1

The certification unit has a cooperation agreement with plasma farmers, namely the Harapan Jaya Palm Plantation Cooperative and Trimulya Lestari Plantation Cooperative (PT. SISM) and the Jasa Panca Mitra Abadi Cooperative (PT. SMA). The company can show the cooperation agreement document with the cooperative, namely:

- Cooperation Agreement between PT. Sepanjang Intisurya Mulia with the Harapan Jaya Palm Plantation Cooperative with Number 02 / SISM-JKT / Kemitraan / 2013 on May 10, 2013. The form of this agreement is the Cooperation Agreement for the Development of Oil Palm Plantations, a One-Stop Management Partnership, with a validity period of 30 year.
- Cooperation Agreement between PT. Sepanjang Intisurya Mulia with the Trimulya Lestari Oil Palm Plantation Cooperative with Number 001 / SISM-JKT / Kemitraan / 2011 on July 29, 2011. The form of this agreement is regarding the Cooperation Agreement for the Development of Oil Palm Plantations, a One-Stop Management Partnership, with a validity period of 30 year.
- Cooperation Agreement between PT. Sawit Mitra Abadi with Koperasi Jasa Panca Mitra Abadi with Number 02 / SMA-Koperasi JPMA / Legal / VIII / 2015 on 26 August 2015. The form of this agreement is regarding the Cooperation Agreement for the Development of Oil Palm Plantations, a One-Stop Management Partnership Pattern with the validity period of this agreement. lasts for 1 cropping cycle and can be extended based on agreement.

Based on the results of document review and interviews with the company, information was obtained that all of these documents could be accessed by farmers directly from the Plantation Office or from the Plasma Assistant through communication media. In

addition, the company also has a price delivery mechanism to farmers in the form of direct information by the Plasma Assistant who visits farmers every day which is conveyed directly to the Cooperative Management.

5.1.2

Based on an interview with PT. Sawit Mitra Abadi with Jasa Panca Mitra Abadi cooperative is known by the that the price of FFB from Jasa Panca Mitra Abadi cooperative was in accordance with prices set by the Plantation Agency and in accordance with the agreement of both parties and there are no complaints regarding the payment of FFB. The Regular updating of FFB prices to cooperation via Whatsapp group and directly short message send to member.

5.1.3

Base on document verification on the agreement letter between the company and Jasa Panca Mitra Abadi cooperative has been known and signed by representatives of both parties and is known by the Regional Government. The results of interviews with cooperation members revealed that the price of FFB from Jasa Panca Mitra Abadi cooperative was in accordance with prices set by the Plantation Agency and in accordance with the agreement of both parties and there are no complaints regarding the payment of FFB. From the results of the interview, it was also conveyed that every payment as well as in the activity / meeting for revenue sharing was always attached with a price list that issued by Plantation Agency.

5.1.4

Base on document verification on the agreement letter between the company and Jasa Panca Mitra Abadi cooperative has been known and signed by representatives of both parties and one is a woman who is a member.

5.1.5

The company has an agreement contract with cooperative and FFB Supplier Each contract document, signed by both parties as evidence that a work agreement has been agreed. Contract agreement documents are kept by both parties, which will be used as legal references. The agreements explain the criteria for FFB grading, payment, validity period, plasma construction provisions, terms of cooperation, financing, pricing, rights & obligations, sanctions to settle disputes and signed by both parties.

5.1.6

Has been verification the FFB Payment and Financial Report May 2022, for the FFB production and pricing of April 2022 for Sawit Harapan Jaya cooperative and Trimulya Lestari Plantation Cooperative. The report describes pricing and pricing periods, FFB amount, reduction/cost, and total paid. The agreed payments made in a timely manner and receipts specifying price, weigh, deductions and amount paid. The payment was conducted within a month.

5.1.7

The company has carried out the test results for electronic bridge scales with the number: 049 / SKHP / MET-THE / IV / 2021 on April 1, 2021. Calibration of the scales was carried out on 3 POM scales, and 3 estate scales. The electronic bridges being weighed are for example:

Brand No, Type, No. Series: Mettler Toledo, IND 560, B.228104408

Hood. Max / Readability: 50,000 Kg / 10 Kg

Tested by: Legal Metrology UPT Type A, Office of Cooperatives, Trade and Industry of Ketapang Regency.

Result: Ratified based on the Law of the Republic of Indonesia Number 2 of 1981 concerning Legal Metrology.

The retest will be carried out on June 15, 2022, related to this the company has conducted a retest on June 28, 2022, but the test results have not been published by a third party. The company has shown the minutes of the activity.

5.1.8

The Company was only working with plasma farmers. The company has not collaborated with independent farmers. The plasma farmers be on the areal land title the company.

5.1.9

The company has an external complaint SOP, which is stated in the SOP for Complaints Resolution with SOP Number SISM-CDP.04 on December 1, 2013. The procedure is made involve the consideration from various parties. Company must maintain the confidentiality of employees who submit complaints and ensure their safety to avoid inappropriate treatment with these employees.

Based on the results of interviews with representatives of the cooperative, information was obtained, they understood the mechanism for handling complaints for farmers, and all complaints, in the last 1 year there were no complaints from cooperatives.

Status: Comply

5.2

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

5.2.1, 5.2.2 and 5.2.3

Until the ASA 4 assessment was carried out, the Company was only working with plasma farmers. The company has not collaborated with independent farmers.

5.2.4

The certification unit shows the document for socializing the use of pesticides to the *Koperasi Jaya Panca Mitra Abadi*, *Koperasi Sawit Trimulya Lestari* and *Koperasi Sawit Harapan Jaya* on January 22, 2022. The socialization was attended by 33 plasma workers. Based on document verification of the socialization material document revealed that one of the materials provided was related to handling pesticides and how to apply them safely. During audit activities, the certification unit shows attendance lists, documentation and training materials.

5.2.5

The unit of certification reviews and reports publicly on the progress of the farmer support program on a regular basis, included on Annual budget meeting for each plasma cooperative, base on interview with cooperative representative the last Annual budget meeting on February 2021.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1

The certification unit has a Social Policy Genting Plantation in November 2015. The certification unit is committed to complying with all applicable labor laws and regulations relevant to the certification unit's business activities as well as complying with the certification unit's internal procedures. The certification unit is committed to achieving this through providing equal employment opportunities regardless of race, ethnicity, religion, caste, nationality, disability, gender, sexual orientation, union membership, political affiliation or age.

Based on interviews with workers during field visits and interviews with labour unions and representatives of the Gender Committee as well as contractors workers also obtained information that there was no indication of acts of discrimination based on religion, ethnicity, gender and regional origin in the process of accepting work.

6.1.2

Based on 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:

- a. The composition of workers consisting of various ethnic groups, religions, gender and workers' origins.
- b. 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.
- c. 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 without discrimination based on gender, ethnicity, religion, health conditions or others.

In addition, there are no migrant workers. All recruitment is carried out in accordance with the certification unit's employee recruitment SOP.

Based on the foregoing, it is known that there is no discrimination against religion, ethnicity and class in obtaining employment.

6.1.3

The certification unit shows a sample of documents related to performance appraisal and leveling promotions for the period 2021-2022. Further explained that employee promotions are based on an assessment of the previous year's work with several points of assessment including: achievement of work targets, level of attendance and compliance with company regulations. Based on the foregoing, it is known that employment procedures have been carried out based on the skills, abilities, and quality of employees.

Based on interviews with estate, mill and plasma employees revealed that each employee had an understanding of the work appraisal system and promotion to the employee level.

6.1.4

The certification unit does not perform a pregnancy test at the time of employee recruitment. Pregnancy checks are only carried out for spray and fertilizer workers on a monthly basis to find out whether workers are pregnant or not. Pregnancy checks are only carried out for female workers who do not use contraception.

Based on interviews with representatives of the gender committee and female employees in the field, it is known that pregnant workers will be transferred to jobs that do not endanger pregnancy, for example as guard officers in daycare centers or manual care workers.

6.1.5

The certification unit has a Gender Committee which states that the representation of men and women in the certification unit to provide support for male and female employees, including protection and maintenance of women's and men's health, maintenance of family life and welfare, protection from sexual harassment and violence, provide continuing education that gender equality exists in the certification unit. Based on the verification of the Gender Committee organizational structure document revealed that the management consisted of field employees and office employees. In addition, in the Gender Committee management structure there is also a man who serves as vice chairman.

Some of the Gender Committee's activities include an internal meeting held on April 21, 2022 with the main topics of discussion related to increasing the role of mothers and families in education/ childcare, understanding family planning, and increasing awareness of women's health issues.

6.1.6

The Certification unit does not discriminate against workers' rights, this is indicated by the payment of equal wages for employees in the same scope of work. The certification unit issued a decision on the payment of salaries for permanent employees and daily employees in 2022 based on the Decree of the Governor of West Kalimantan No. 1462/DISNAKERTRANS/2021 concerning Ketapang District Minimum Wage 2022. The decree stipulated the minimum wage for estate and the mill sector with a value of IDR 2,876,252.79

The certification unit has also developed a structure and pay scale that applies to employees with a service period of more than 1 year. It was further explained that the structure and scale of wages were determined based on years of service and an annual performance appraisal by each supervisor.

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 shows the Internal Office Memo from Assistant Vice President Palmindo with No. 001/IOM/AVP-PAL/XI/2017 dated November 30, 2017 concerning provisions for wages for Harvest Checkers on sundays/ holidays. In the IOM it is explained that the wages given to harvest checker workers who work on Sundays/holidays:

1. 2 times the basic salary/ working day.
2. Employment premium with GPN premium rate per working day (set at IDR 35,000)

However, the IOM has not regulated how the mechanism of wages for harvester who work on sundays/ weekly rest days as regulated in PP 36 of 2021 article 39 states that employees who work on holidays are required to get overtime pay. This is proven based on

1. Based on the harvester (NIK 10014524) wage verification of payment documents for the period of June 2022 who work on sundays, it is known that the payment system is the same as payments on normal working days (system of yield units).
2. Based on the interviews with Mulia 3 harvester revealed that the payment of wages if working on sundays is the same as the usual day (product unit system).

Based on the explanation above, it is known that the certification unit has not shown the wage requirements in accordance with the applicable labor regulations.

The certification unit has not shown sufficient evidence that the mechanism that regulates the procedure for wages while working on holidays is for all levels of employees. **Based on that's explanation raised Non-Conformity No 2022.03 with Major Category**

6.2.2

The certification unit shows the Collective Labor Agreement (CLA) of:

1. PT Sepanjang Intisurya Mulia for the period 2021-2023 which has been ratified based on the Decree of the Head of the Manpower and Transmigration Office of Ketapang Regency No. 188 of 2021 dated December 06, 2021.
2. PT Sawit Mitra Abadi for the period 2022-2024 which has been ratified based on the Decree of the Head of the Manpower and Transmigration Office of Ketapang Regency No. 057/TKT-08/560/2022 dated April 12, 2022.

The Collective Labor Agreement explains several things, including: work relations, employee career management, working days and hours, overtime work, deduction, leave, wages, workforce development, social security, OHS, work procedures for resolving complaints and industrial relations disputes. The CLA has been conveyed to all workers through socialization carried out in stages in estate and mill starting from October 2021 - December 2021.

Based on the verification of employee salary slips show that the payslips provide good information regarding wages, compensation and deductions for each employee. Based on interviews with estate and mill employees show that the certification unit always provides socialization related to item information in salary slips so that employees are not confused or misinterpreted.

Based on the employee list, it is known that all employees are permanent employees.

Based on field observations and interviews with estate, and mill employees known that all employees are permanent and had received Collective Labor Agreement socialization and understood the contents of the Collective Labor Agreement.

6.2.3

The certification unit shows documents related to evidence of compliance with labor provisions as follows:

1. Estate employee salary slip with employee number 10006944 for June 2022 period. The salary slip explains that employees get a basic salary in accordance with the prevailing wage structure and scale and receive benefits, attendance incentives and overtime whose calculations are in accordance with applicable regulations. apply.
2. Certificate of Maternity Leave with No. 044/PT.SISM/Klinik Central/04/2022 for employees with the initials ES. Maternity leave is given for 90 days from April 18, 2022 to July 18, 2022.

Based on field observations and interviews with mill, estate and plasma employees revealed that the certification unit had paid employee wages and overtime in accordance with applicable regulations, further explained by the employee that there were no difficulties in applying for employee leave.

6.2.4

The certification unit has provided welfare facilities to occupants in the form of housing, clinics, water supply, electricity, education, transportation and other facilities. Based on field observation in the housing area revealed that workers were provided with adequate housing facilities with 2 bedrooms, 1 bathroom and there was daycare for children. The house is inhabited by 1 family and specifically for workers who are not married then 1 house will be filled by 2 workers. This is in line with the results of interviews with housing residents stating that the facilities provided by the certification unit are houses, electricity, availability of clean water, transportation of school, child daycare, places of worship (mosque), sport facilities and others. In general, the facilities provided by the certification unit are good / suitable for use by workers and their families.

6.2.5

Based on field observations and interviews with estate, mill and plasma employees revealed that in the certification unit's environment there are basic food cooperatives, vegetable vendors and stalls in the employees' homes that provide their daily needs at affordable prices.

6.2.6

The certification unit has calculated the prevailing wages and in-kind benefits based on the guidelines issued by the RSPO. Prevailing wages are taken from prevailing wages such as basic wages/ minimum wages. Meanwhile, in-kind benefits are taken from all costs incurred by the certification unit for the provision and maintenance of facilities provided by the certification unit to employees, such as electricity, housing, water, schools, health facilities, and baby care. For example, to calculate the in-kind benefit of housing, the costs considered in the calculation include building material costs, construction costs, and including maintenance costs for 25 years (technical considerations of buildings are feasible to use). The calculation result of prevailing wages and in-kind benefits received by employees is IDR. 3,250,698/ month (Minimum wages in 2022, IDR. 2,876,253/ month + in-kind benefit, IDR. 374,445/ month).

6.2.7

The certification unit has determined the main types of work in the operational unit by referring to the Decree of the Central Executive Board of GAPKI with No. SK/002/PPG/III/2013 dated February 8, 2013. The decree explains that the main types of work are harvesting and processing fruit into CPO.

Based on the verification document of employee list for FFB harvesting and processing activities revealed that all employees for this work were permanent employees.

Based on field observations in the operational areas of the estate and mill also did not find any FFB harvesting and processing employees with non-permanent status.

6.2.1	Status: Non-Conformity No 2022.03 with Major Category
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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

In the Social policy Genting Plantation in November 2015 there is a statement of recognition of freedom of association. The document is published in Bahasa which can be understood by all employees. In addition, the certification unit has a Collective Labor Agreement which states that employees have the right to establish labor unions and become members/ leaders of labor unions in accordance with applicable regulations. The information on freedom of association listed in the Collective Labor Agreement was carried out regularly and the last socialization was held on May 11, 2022.

6.3.2

Based on interview with labor union known that the meeting was only held if there were things that needed to be discussed with other members. In this case, the certification unit shows an example of documenting a labor union meeting, for example: meeting on 02 December 2021 with the main discussion about socialization of the mechanism for expressing opinions through labor unions.

Based on the foregoing, it is known that the certification unit already has good documentation regarding the internal meeting of the labor union.

6.3.3

Based on interview with the labor union, it is known that the certification unit did not interfere the formation or operation of the Labor Union. The selection of organization structure conducted independently.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1

In the ASA-2 assessment, there is an OFI related to ensuring the clause on child protection/ prohibition on employing children has been included in the next cooperation contract. In the ASA-3 and ASA-4 (onsite) assessments, the auditors verify several work agreements with local contractors, for example through agreement No.001/SISM-M5&6/TBS/SPK/I/2022 dated January 3, 2022 with CV Lantang Tuah and Agreement No.002/SISM-M5&6/TBS/SPK/I/2022 dated 03 January 2022, it is known that the articles prohibiting child labor, forced labor and human trafficking have been explained in the agreement.

Certification unit has policy regarding the age requirements of workers is contained in Collective Labour Agreement states that the requirement for accepting workers is at least 18 years old. Policies regarding the age of workers are also available in Recruitment Procedure concerning which states that it is forbidden to employ child labor and under the age of 18 (eighteen) years, this is evidenced by the Identity Card at the time of employee recruitment. Based on verification of documents revealed that there were no workers under the age of 18. In addition to having a policy governing the minimum age for workers for workers. This policy has been socialized to all employees in each estate, mill and local contractor. The certification unit can show documentation, attendance list and information dissemination of the policy.

Based on field observation and interviews with estate, mill and contractor workers, known that the minimum age for work is 18 years, and no workers found below the minimum age specified. This is supported by the results of a review of certification unit and contractor workers' document which proves that there are no workers under the age of 18 at the time of entering work, the youngest age of workers is over 18 years when entering work.

6.4.2

The certification unit shows a list of employees accompanied by date of entry and date of birth. In addition, an example of proof of recruitment is also shown in the form of a copy of the employee's ID card and family card. From these data it is known that there are no employees under 18 years of age when accepted to work at the certification unit.

Based on field observations and interviews with estate, mill, and contractor employees revealed that there were no employees under the age of 18 when they started working.

6.4.3

Based on document verification and field observations revealed that in the last 1 year there were no apprentices in the certification unit's operational areas.

6.4.4

Based on interviews with the gender committee and workers in the field revealed that the workers had understood the rules regarding the prohibition of bringing children to work. The certification unit also showed the news of the socialization and education on child protection and development on May 17, 2022 attended by 34 participants.

Status: Comply

6.5

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

6.5.1

The certification unit has a Social Policy Genting Plantation, which explains that the certification unit prevents sexual harassment and how it is handled. Policies regarding the sexual harassment and violence are also available in Collective Labour Agreement. It explains that every worker is entitled to receive protection against sexual harassment in the workplace and Sexual harassment is an offense and if convicted of sexual abuse offenders will be penalized in accordance with applicable regulations. This policy

has been socialized to all employees in each estate, mill and local contractor. Certification unit can show documentation, attendance lists and socialization materials.

Based on interview with workers and committee gender, the policy had disseminated to workers through gender committee meetings with workers and in the last year period, that hasn't any issue/ incident related to sexual harassment, violence at work/reproductive rights.

6.5.2

The certification unit has established a social policy regarding the protection of reproductive rights, especially for women. The policy explains that the certification unit will follow all applicable regulations relating to reproductive rights, including the right to maternity leave, and will provide pregnant and lactating women with tasks that do not pose a health risk to themselves or their children. This policy has been socialized to all employees in each estate, mill and local contractor. Certification unit can show documentation, attendance lists and socialization materials.

Based on interview with the board of gender committee, the certification unit provides the female worker with menstrual leave, pregnant and nursing leave for about 3 months. Pregnant and nursing female worker is prohibited to work related to chemical. And also, certification unit give special breastfeeding time for female worker, but prohibit the worker from working with chemical material.

Based on interviews with women workers in estate and mill revealed that the certification unit had given women workers 1 day of menstrual leave and 3 months of maternity leave. Further explained that so far there has never been a problem in applying for menstrual or maternity leave.

6.5.3

The certification unit shows the document for the list of new mothers in 2022. From the list, it is known that from January to June 2022 there were 13 employees. Furthermore, the certification unit showed the document Identification of the Needs of New Mothers in which the assessment was carried out on 13 employees who were pregnant since 2022. Based on the assessment, known that the certification unit allows female workers (young mothers) to breastfeed their children. This has been implemented in the operational environment by giving permission to female workers (young mothers) by filling out a Breastfeeding Permit with the name, part, time of leave and return information known to the worker leadership.

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

6.5.4

Complaint mechanism of workers was contained in Procedure No. SISM-HRD-04-00.00, valid date 01 December 2013. The procedure aims to accommodate complaints and grievance from employees. In the procedure described that if requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).

Based on interviews with estate and mill workers for example spraying teams, warehouse officers, and weighbridge are known to be aware of the grievance mechanism. Related complaints of sexual harassment (women's issues) can be submitted to the gender committee. In the last year period, that hasn't any complaint related to sexual harassment, violence at work/ reproductive rights

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1

The certification unit have policy related prohibits forced or bonded labor or debt bondage and take steps to prevent it. The procedures related to human resources management shows that every worker has a work agreement that describe specific job description. Based on employee list in 2022 known that there are no migrant workers, forced labour. Every worker has a work agreement that describe specific job description, there is no substitution of contract without prior consultation and agreement from the worker.

Based on employee data and interview with workers, most of the workers came from local communities. They have the recruitment process in the company and is in accordance with applicable employee acceptance procedures.

Based on verification document, field observation, and interviews with workers and stakeholders, auditors did not see any harvester accompanied by their wife or children and any indication of forced labor. There is no threat against family members. Based on document verifications and field observations in spraying & harvesting activities at Estate and Mill operations activities, there were no forms of forced or trafficked labor are used. Besides that, there are no foreign workers who work at estate and mill.

6.6.2

There are no migrant workers who work in the certification unit's operational area. All workers come from within one country (although from various regions). In addition, each worker has been provided with a clear work contract. The rights and obligations of workers are also clearly stated in certification unit regulations, company regulation, and in work agreements. Based on the employee list, it is known that all employees are permanent employees.

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

PT Sepanjang Intisurya Mulia

The certification unit shows the document ratifying the OHS committee organizational structure through the Decree of the Head of the Manpower and Transmigration Office of West Kalimantan Province with No. 165/NT.WASKER.1/2021 dated March 23, 2021. The document explains that Harmadi is the secretary of OHS committee. The certification unit in this case shows the Decree of the Minister of Manpower of the Republic of Indonesia with No. 5/33582/AS.02.04/IV/2021 dated April 21, 2021 regarding the Appointment of OHS Expert on behalf of Harmadi and valid for 3 years from the date of stipulation.

Certification unit can show regular meeting activities, including: OHS Committee Meeting held on June 26, 2022. The topic of discussion are HIRAC review, emergency equipment review and EHS training review. The activity was attended by 17 participants.

PT Sawit Mitra Abadi

In the previous ASA-2 assessment, it was known that there was OFI related to the approval of the OHS Committee and the appointment of OHS Experts for PT SMA. Based on the auditor's verification, it is known that the certification unit shows the document ratifying the OHS committee organizational structure through the Decree of the Ketapang Regent with No. 560/248/NAKER/2020 dated November 01, 2020. The document explains that Yulianto is the secretary of OHS committee. The certification unit in this case shows the Decree of the Minister of Manpower of the Republic of Indonesia with No. 5/9304/AS.02.04/X/2020 dated October 19, 2020 regarding the Appointment of OHS Expert on behalf of Yulianto and valid for 3 years from the date of stipulation.

Certification unit can show regular meeting activities, including: OHS Committee Meeting held on June 24, 2022. The topic of discussion are EHS training review, housekeeping assessment, and EHS performance simulation. The activity was attended by 14 participants.

6.7.2

The certification unit has emergency and work accident response procedures, which are listed in the Emergency Response Procedure. These procedures, among others, regulate emergency response to fires, leaks, accidents, explosions, natural disasters, riots and pollution. In addition, there are also First Aid Procedures, Work Accident Reporting Procedures and Work Accident Investigation Procedures.

The certification unit has also provided workers who are assigned to the field and other work locations and have received First Aid training. In addition, the certification unit has a licensed first aid officer with certificate number 10-PK3-P3K/II/2020 and 11-PK3-P3K/II/2020. These first aid officers then giving annual first aid training to the supervisors in the Mill and Estate. Based on field observation, the supervisor has been given first aid kit and can demonstrate the first aid handling.

The certification unit has also provided first aid kits in the workplace, the contents of which refer to the applicable regulations, namely 21 items. The certification unit shows the results of monitoring the completeness of the contents of the first aid kit for the period January – June 2022 located in buildings such as process stations, laboratories, process stations, workshops, warehouses, security posts and temporary storage of toxic and hazardous waste and offices. The certification unit also provides a first aid bag that is in the field and brought by the field foreman.

Auditors have checked and verified documents regarding the availability of First Aid Kits at estates and mill. The verification results show that the certification unit has provided First Aid Kits with various packages as required by PER.15/MEN/VIII/2008 attachment 5 (Boxes type A, B, and C), for example the number of First Aid Kits at Mill is 5 boxes with 106 employees while the number of First Aid Kits at PT SMA is 43 boxes with 1059 employees. The certification unit shows the First Aid Kit inspection data at PT SMA for the period of June 2022 which states that all the items in the First Aid Kit are in complete condition, none of which have expired and all item are ready to be used.

Based on interviews with management, if there is an emergency in the mill area, the workers will report to their superiors, then they will submit it to the head of the emergency response team and EHS. Then the emergency alarm was turned on at the security post and CPO despatch. All gathered at the assembly point in front of the mill office according to the evacuation directions that had been installed.

Based on checking the first aid kit for harvesting activities located in PT SIsM, it is known that the number of first aid kit items (Category A) is in accordance with applicable regulations, for example: quick plaster with an amount of 10 pcs.

Based on interviews with estate and mill workers known that the certification unit also provides emergency gathering facilities and directs evacuation signs in the plantation and mill office areas in case of emergency events such as fires and earthquakes.

Based on the above, it is known that the certification unit has provided sufficient first aid kits as required by regulations where the number of items in the first aid kit (category) corresponds to the number of employees in the field.

6.7.3

The certification unit already has SOP for Personal Protective Equipment. The SOP explains the PPE standards for each job starting from harvesting, spraying, fertilizing, heavy equipment operators, loading FFB, mechanics, welders, manual maintenance, field staff, civil engineering, foremen, warehouse officers, generator operators and solar tank activity.

It was further explained that the certification unit had disseminated PPE SOPs to employees, for example the OHS Socialization and Use of PPE on February 09, 2022 which was attended by 67 workers. The certification unit can show the documentation, attendance list and socialization materials.

In addition, the certification unit also showed samples of the PPE handover documents for 2022 through the PPE Handover Minutes document on January 17, 2022 for boots, and gloves. The certification unit also shows sample documents for employee PPE replacement through the Minutes of PPE Replacement document on April 27, 2022, for boot.

Based on field observations and interviews with estate, mill and contractor employees revealed that the certification unit had provided PPE to employees in accordance with the risk assessment that had been carried out previously. PPE can also be replaced if the PPE used is damaged.

Based on field observations at employee facilities show that the certification unit has provided sanitation facilities and storage of goods for workers who use chemicals. In addition, rinse water is collected and will be reused for further pesticide application activities.

6.7.4

The certification unit shows proof of payment of *BPJS Kesehatan* and *BPJS Ketenagakerjaan* for estate, mill and plasma for the period April – June 2022. From the results of document verification, it is known that all workers have been included in the *BPJS Kesehatan* and *BPJS Ketenagakerjaan* program, for example proof of payment of *BPJS Kesehatan* and *BPJS Ketenagakerjaan* for the period of June 2022 for 1,059 PT SMA employees paid on July 22, 2022 (*BPJS Ketenagakerjaan*) and June 18, 2022 (*BPJS Kesehatan*).

Based on field observations and interviews with estate, mill and contractor employees, it is known that every employee has been included in *BPJS Kesehatan* and *BPJS Ketenagakerjaan*, it is further explained that employees have used *BPJS Kesehatan* for treatment at public health services because each employee has held his *BPJS Kesehatan* card.

Based document verification of the work accident recap for 2022 for each unit, it is known that in 2022 until now there have been no work accidents in the fatal category. As for work accidents that occur, they can be handled by the health service unit in the certification unit because they are in the minor category. Further explained by the certification unit during the interview that in the 2022 period there were no work accident claims submitted by employees.

6.7.5

The certification unit has recorded work accidents using Lost Time Accident (LTA), which is listed in the Work Accident Board document. These documents include explaining the level of work accidents such as death, serious injury (lost time > 3 days), minor injuries (lost time < 2 days), first aid (without lost time), total employees, total reportable accidents, total work accident cases (lost time > 3 days), total working hours, FR and SR as well as work accident statistics for the 2022 period per month.

Based on the verification of work accident documents up to June 2022, it is known that there were no fatal work accidents for either the mill or estate locations. Based on interviews with OHS Experts revealed that work accidents that occurred were only in the minor category with the control of the first aid kit so that there were no lost working days.

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 has a record of the implementation of pest monitoring and control, by showing evidence such as:

- The company shows a pest observation document in May 2022 at PT SIsM, including *Psychidae* pests, the number of *Psychidae* is known to be below the threshold (<5% caterpillars/midribs) which is an average of 0.4%, observations of *Setothosea asigna* pests are known to below the threshold (<5% caterpillars/midribs) which is an average of 0.1%, observations of *Oryctes* pests are known to have an average number of *Oryctes* below the threshold (<5% caterpillars/midribs) which is 0.2%, observations of rat pests in May 2022 at PT SIsM are known to average the average percentage of rat attacks below the threshold (<5% rat/crop) is 4.8%. Based on the results of document reviews, interviews, field observations, and pest censuses, the company has not yet carried out chemical pest control. Planting a beneficial plant, the company has planted a beneficial plant by showing a monitoring document of a beneficial plant, based on the document review it is known that the company has planted a beneficial plant in 2021 – June 2022, namely: Planting *Turnera subulata* in PT SIsM for 8,160 Mtr and *antigonon leptopus* as much as 74 stem, planting *Turnera subulata* at PT SMA along 1,200 Mtr.
- Development of Owls as natural predators of rats. Based on a review of the owl cage data documents at PT SIsM, it was found that there were 66 owl cages.

From the results of field visits, interviews, and document review, it is known that the company has and has implemented SOPs for pest monitoring and control.

7.1.2

The company does not use the species mentioned in *Permen LHK No.P. 94/MENLHK/SEKJEN/KUM.1/12/2016* concerning Invasive Types. This is based on the documents monitoring of planting/maintaining beneficial plants, such as *Turnera Subulata*, and *Antigonon leptopus* both at PT SIsM and PT SMA to deal with attacks of *Limacodidae* and *Psychidae*. The company has planted a beneficial plant by showing the beneficial plant monitoring document, based on a review of the document it is known that the company has planted the beneficial plant of the 2021 - June 2022, namely: planting *Turnera subulata* in PT SIsM along 8,160 Mtr and *antigonon leptopus* as many as 74 stem, *Turnera subulata* planting in PT SMA along 1,200 Mtr. The company also

uses Tyto Alba species for biological control of rat pests. Based on a review of the owl cage data documents in PT SisM, it is known that there are 66 owl cages in PT SisM.

7.1.3

The company has shown its commitment to eco-friendly plantation management. Based on document review, field observation, as well as interview with the workers and external stakeholders, known that the company did not use fire for pest control.

Status: Comply

7.2

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

7.2.1

The company has SOP No. OPM 06 regarding weed control, guidelines covering the use and handling of pesticides, medical supervision and spray records, types of plant care using pesticides, herbicide recommendations for general weed control, calibration procedures as well as total spraying and erosion control policies. The company has a written commitment to reduce paraquat pesticides in plantation operations, which is shown in the Agronomy Internal Office Manager Memo number 003/GPRC (I)-/02/2018 dated February 1, 2018 regarding the program to minimize the use of paraquat herbicides. The company then updated the Internal Office Memo which was legalized by Regional Agronomist Region 1 Palmino dated September 29, 2021, which stated that the use of the herbicide paraquat was stopped starting September 30, 2021. With this concept, the use of pesticides that are limited in nature such as paraquat is not used.

Measures to avoid the development of resistance are to use pesticides selectively (for weeds) and develop biological control (for pests). The company shows a list of all types of pesticides used for the 2022 period, for example at PT SisM & PT SMA, namely:

Pesticide	Active Ingredients	No. Registration	Objective
SUPREMO 480 SL	Isopropil amina glifosat 480 g/l	RI.01030120021712	Broadleaf weed (mikania micrantha, synedrella nodiflora), narrow leaf weed (Axonopus compressus, Ottochloa nodosa)
KENFOSAT	Isopropil amina glifosat 480 g/l	RI.01030120103757	Broadleaf weed (mikania micrantha, synedrella nodiflora), narrow leaf weed (Axonopus compressus, Ottochloa nodosa)
KENLLY 480 EC	Triklopir butoksi etil ester 480 g/l	RI.01030120062433	Broadleaf weed (Mikania micrantha, Synedrella nodiflora, Chromolaena odorata)
Ally 20	Metil metsulfuron 20%	RI.0103011988837	Broadleaf weed (Borreria latifolia, Calopogonium mucunoides)

Based on observations and interviews with spray workers in block K5, Plasma Division 1 PT. SisM and block I14 Plasma Division 2 PT SMA concluded that workers know about the function of chemicals used and are selective when spraying activities. For example, Isopropyl amine glyphosate and Triclopyr butoxy ethyl ester 480 g/l are used for path spraying.

7.2.2

The company shows a record of pesticide use from January to December 2021, which is included in the monthly pesticide monitoring document containing information on the type of pesticide used, active ingredient, area used, amount used, usage units, period of use and LD-50, and class WHO. For example at PT. SMA Abadi 1 – 2 Estate for the period January - December 2021 as follows:

Pesticides	Active ingredient	Class	LD50 (rat) (mg/kg)	Amount used (Ltr or Kg)	Area used (Ha)	Unit/Ha
SUPREMO 480 SL (L)	Isopropil amina glifosat 480 g/l	III	4230	5.042	6.303	0,80
KENLLY 480 EC (L)	Triklopir butoksi etil ester 480 g/l	II	710	333	1.113	0,30
BES UP 480 SL (L)	Isopropil amina glifosat 480 g/l	III	4230	320	400	0,80

KENRANE 288 EC (L)	Triklopir butoksi etil ester 288 g/l	II	710	74	247	0,30
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Based on field observations, it is known that workers understand the principle of selective weed control and the Buffer zone area such as a river border, around 2 trees along the river border, there should be no application of pesticide spraying.

7.2.3

The company shows records of pesticide use in 2020 and 2021 at PT SIsM and PT SMA which shows a decrease in pesticide use, such as:

Companies	Pesticides	Unit	Quantity (2020)	Quantity (2021)
PT. SIsM	Ally 20	Kg	4,257	2,160
	KENLLY 480 EC	L	5,863	2,914
	SUPREMO 480 SL	L	20,450	19,825
PT. SMA	SUPREMO 480 SL	L	15,973	9,107
	KENLLY 480 EC	L	2,926	1,954

The company has also planted beneficial plants, such as *Antigonon leptopus* and *Turnera*. In addition, the company also develops owls as natural predators of rats. Based on a review of the owl cage data documents at PT SIsM, it was found that there were 66 owl cages.

Based on field observations, interviews, and document review, it is known that the company has maintained records of the use of pesticides and their reduction to some extent by substitution of environmentally friendly materials/using biological agents for the maintenance of plantation crops.

7.2.4

The company shows a plan for pest control activities consisting of detection and census of rats, leaf-eating caterpillars, and biological control, such as planting beneficial plants and developing owl populations. The company monitors the effectiveness of biological pest control such as developing beneficial plants for oil palm leaf-eating caterpillars and developing owls for mice. The use of insecticides is carried out if the level of pest attack is above the threshold (> 5% caterpillars/fronds or > 5% rats/plants). The company showed documents for observing pests in May 2022 at PT SIsM, including *Psychidae* pests, the average number of *Psychidae* was 0.4% (below the threshold), observations of *Setothosea asignans* found the average number of *Setothosea* assigns 0.1%, observations of *Oryctes* pests found the average number *Oryctes* average 0.2%, observations of rat pests in May 2022 at PT SIsM it is known that the average percentage of rat attacks is 4.8% (below the threshold).

Based on the results of document reviews, interviews, field observations, and pest censuses, the company has not yet carried out chemical pest control.

7.2.5

The company has a written commitment to reduce paraquat pesticides in plantation operations, which is shown in the Agronomy Internal Office Manager Memo number 003/GPRC (I)-/02/2018 dated February 1, 2018 regarding the program to minimize the use of paraquat herbicides. The company then updated the Internal Office Memo which was legalized by Regional Agronomist Region 1 Palmino dated September 29, 2021, which stated that the use of the herbicide paraquat was stopped starting September 30, 2021. With this concept, the use of pesticides that are limited in nature such as paraquat is not used. Based on document verification, from September 2021 the company will not use paraquat and WHO Class 1A or 1B, or those registered by the Stockholm or Rotterdam Convention applications.

Based on the results of the physical verification carried out at chemical warehouse of the Mulia1-2 Estate PT SIsM and Abadi 1-2 Estate PT SMA, it can be concluded that the stock records are in accordance with the actual physical in the chemical warehouse and no paraquat pesticides were found.

7.2.6

The company has SOP No. OPM 06 regarding weed control, guidelines covering the use and handling of pesticides, medical supervision and spray records, types of plant care using pesticides, herbicide recommendations for general weed control, calibration procedures as well as total spraying and erosion control policies.

To ensure this is working, the company carries out training on the use of pesticides for pest/weed spraying activities, such as:

- Spray training at PT SMA Abadi 1-2 Estate, on July 15, 2022, which was attended by 8 workers and the spray foreman.
- Spray training at PT SIsM Mulia 1-2 Estate, on 10 July 2022 which was attended by 7 workers and the spray foreman.

Based on field observations in block I14 Division Plasma 1, Abadi 1-2 Estate PT SMA, block K5 Division Plasma 1, Mulia 1-2 Estate PT SIsM, it is known that workers have carried out work in a trained and appropriate manner, use appropriate PPE, areas related to chemicals equipped with B3 warnings, limited area warnings, PPE use warnings, emergency response facilities such as APAR, MSDS, HIRAC, rinse bathrooms, spill control areas and cleaning tools.

7.2.7

The results of the field visit in Mulia 1-2 Estate PT SIsM, it is known that the company already has sanitation facilities equipped with rinse rooms, showers, drainage channels, storage areas for work tools and PPE, milk drinking rooms, no pesticides were found in the building.

The results of the field visit at the chemical/pesticide storage warehouse, it is known that the chemical storage area has been equipped with closed containers, arranged on shelves equipped with MSDS and labeled Toxic and Hazardous Waste as well as warnings outside the building, cloth and other cleaning tools are available to anticipate spills from pesticides, the fertilizer storage area is equipped with ventilation and is lined with pallets

Based on this explanation, it is concluded that the company has stored the chemical materials in accordance with the applicable regulations.

7.2.8

The company has SOP for handling hazardous and toxic waste with document number SISM-ENV 551). The SOP explains the categories of hazardous waste including domestic, broken glass, sharp objects, chemicals, general laboratory / operational waste. Hazardous and Toxic Wastes are stored in Temporary Storage Places Hazardous and toxic wastes are handled according to their types and characteristics. Based on interviews with employees of Chemical Warehouse PT SISM & PT SMA, it is known that the officers understand about waste disposal procedures such as used pesticide packaging to be collected at the Temporary Storage for Hazardous and Toxic Wastes which will then be transported by the hazardous and toxic waste transporters.

The company also has working agreements with third parties to handle hazardous and toxic waste. The company can show the Cooperation Agreement Letter between PT Sepanjang Intisurya Mulia and PT Indo Rudi Jaya (SISM.IRJ.CSS//2022/11) which was stipulated on 3 January 2022 for the handling, management and utilization of Hazardous and Toxic Wastes valid as long as three years (period ends December 31, 2024). Likewise for PT SMA, they already have a work agreement for the management of hazardous waste. transporting hazardous waste ex pesticide container PT SMA is 0.16 ton date 27 February 2022 by PT Indo Rudy Jaya with manifest KLHK-1645212015.

7.2.9

Based on the results of a review of pesticide application documents and interviews with management, spray workers and the village heads, it was found that during the ASA 3+4 Onsite Audit the company did not conduct airborne spraying.

7.2.10

Special health examinations (cholinesterase and audiometry) for workers with certain occupational risks have been carried out annually at the accredited Laboratory of the West Kalimantan Provincial Manpower Office. The 2021 examination has been carried out based on the report on December 16, 2021. The results of the medical examination are informed to all workers that all of them are in good health (normal results). In addition, based on interviews with workers, it is known that they have never had an accident at work.

7.2.11

The certification unit has an antenatal care program for all female workers who work with chemicals, this is done to ensure that no workers who are pregnant/ breastfeeding work in these conditions. Currently, the number of female workers who work with chemicals (spraying, fertilizing, etc.) for PT SIsM and PT SMA are 108 workers. Based on document verification of the 2022 pregnancy examination document showed that 1 employee was pregnant. The certification unit in this case transfers employees by showing the document about Position Transfer Letter with No. 011/HRD-SMA/SK/II/2022 dated January 1, 2022. Employees with the initials SR were transferred from herbicide application to upkeep maintenance because they were pregnant. The mutation is effective from the date of stipulation.

Based on the above, it is known that the certification unit already has a policy of not spraying for pregnant/ breastfeeding women and a procedure to identify pregnancy for female pesticide applicators so that this is declared appropriate.

7.2.5 | **Status: Non-conformity 2021.02**

7.3

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

7.3.1

All waste products and sources of pollution have been identified and documented in the waste management and identification document period of 2021 and 2022. Based on document verification shown company has implemented waste management accordance with waste identification source and management plan for examples are:

- Estates, waste source: chemist activities, waste type: ex pesticides containers (toxic and hazardous waste), clinic waste, managed by stored in optimalization store and sent to related transporters
- Mill, waste source: FFB process, waste type: shell and fiber (non-toxic/hazardous waste), managed by renewable energy usage for boiler
- Mill, waste source: FFB process, waste type : palm oil mill effluent, managed by the effluent pond and land applications as nutrient cycle.
- Estates, waste source: pruning activities, waste type: oil palm frond (organic waste), managed by frond stacking.

In accordance with the procedure, the resulting hazardous waste is recorded, documented, and stored in licensed storage.

The company plans to manage domestic liquid waste:

- Price offer document for domestic liquid waste permit processing dated 3 May 2022.
- Evaluation of the tender winner for PT Enviro Karya Indonesia's domestic liquid waste permit on July 23, 2022.
- Bugged request document dated July 23, 2022.
- That the company is still continuing to process the domestic liquid waste permit.

7.3.2

The company has identified the source of waste and pollution source and treat the identified source to reduce emission and pollution. The effort taken by the company are:

- Empty fruit bunch is applied to estate plantation area to substitute chemical fertilizer. Based on field visit EFB application is well managed.
- Shell and fiber are reused for engine fuel of boiler. It reduce the carbon emission from the combustion of fossil fuel.
- POME use for fertilizer, based on field visit the condition of flatbed has been maintenance well and no environmental pollution potential.
- The managing for clinical waste, the company also has cooperation with licensed parties such as PT Indo Rudy Jaya.

For the fiber and shell are managed by renewable energy usage for boiler and palm oil mill effluent (POME), managed by the effluent pond and land applications as a nutrient cycle.

The waste management and disposal plan has been included in the procedures that are owned according to the type / category of each waste, for example:

1. Domestic Solid Waste

The SOP for domestic waste management is described in the Procedure for Waste Management in Work Areas and Housing No. SOP ENV557 dated August 1, 2013 explaining that the domestic waste generated is transported periodically (according to the schedule) to the landfill (TPA). The transportation officer makes a record on the domestic waste report form.

2. Hazardous Waste
The SOP for the Management of Hazardous and Toxic Waste Management Procedures No. SOP ENV551 dated August 1, 2013 explains that the waste of 3 hazardous chemicals (including pesticides) is placed in a hazardous waste storage, then handed over to licensed transporters and beneficiaries.
3. Waste from fertilizer sacks
The Waste used for fertilizer sacks is regulated in SOP OPM 07 Fertilization of Palm Oil Plants (Manuring) which explains that sacks of fertilizer are collected in the fertilizer warehouse. However, the SOP does not clearly regulate and further what if the waste from the fertilizer sack (including the inner, inner plastic wrap) is damaged and is no longer used.

So based on the results of field visits, there are still sacks of discarded fertilizers in various locations, for example:

Based on the results of the field visit, it is known that the procedure has not been fully implemented, for example:

- In Abadi housing 1 and 2, it is known that there is a domestic waste disposal activity in the back ditch of the housing.
- In Mulia 3 housing, it is known that there are traces of domestic waste burning activities and domestic waste disposal in front of the housing (in the sil pit).
- It was found that several types of hazardous waste were not placed in unlicensed locations, for example:
 - Used oil drums are used as trash bins at the Mulia Oil Mill Engine Room Station.
 - Used oil drums are placed next to Mulia Oil Mill's general warehouse
 - Used oil drums at Mulia Oil Warehouse
 - Pesticide packaging and used oil drums are used as a drinking water reservoir in the barracks for employees of a warehouse building contractor in Mulia 3 housing complex.
- It was found that used fertilizer sacks were not managed according to procedures, for example:
 - Dumped in front of Mulia 3 estate housing complex (in sil pit).
 - Dispose of at the final waste disposal site for the Sawit Mitra Abadi 1-2 Estate housing block H17.
 - Dispose of in the final garbage disposal site for Mulia 3 housing complex.

The company has not been able to show evidence that the evidence of waste disposal is in accordance with the procedures it has. **Based on that's explanation raised Non-Conformity No 2022.04 with Minor Category**

7.3.3

The company does not carry out open burning for solid waste disposal generated of the mill. Base on field observation known solid waste such as EFB, and hazardous waste no burned. For shell and fiber burned in a closed place used as boiler fuel.

7.3.2	Status: Non-Conformance number 2022.03 with minor category
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7.4 Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.

7.4.1

The company has procedures for managing soil fertility as stated in document no. SISM-AGR-07-00-00 regarding fertilization, which consists of several work instructions (WI), as follows:

- WI No. SISM-AGR-07-00-01 dated December 01, 2013 regarding Fertilizer Loading.
- WI No. SISM-AGR-07-00-02 dated December 01, 2013 regarding the Management of Used Fertilizer Bags.
- WI No. SISM-AGR-07-00-03 dated December 01, 2013 regarding the transportation and distribution of fertilizers to the field.
- WI No. SISM-AGR-07-00-04 dated December 01, 2013 regarding Fertilization.

The company has implemented practices to optimize production results in accordance with established procedures, including:

- Regular sampling of soil and leaves by Genting Plantations Research Center Indonesia to ensure the elements needed by plants for optimal production. The results of the analysis of the tested soil and leaves will be the basis for determining the dose of fertilizer in each Estate.
- Fertilization activities that prioritize the principles of being on time, on target, at the right dose and on application. In addition, marginal soils (sandy) are given extra fertilization in the form of empty bunches.
- The company's commitment to no longer use pesticides with the active ingredient paraquat or those belonging to the WHO Class 1A and 1B groups.

- Application of palm oil effluent (POME) to increase soil fertility. For example, the POME application at Mulia 1-2 Estate.
- Maintenance of cover crops to reduce evaporation (maintain soil moisture). For example planting legumes (*Mucuna bracteata*) and maintenance of soft ferns (*Nephrolepis bisserata*). To all employees, spraying is always conveyed at morning apples not to spray the plants.

Monitoring the implementation of SOPs, among others, is carried out through an internal audit mechanism.

7.4.2

The company shows the procedures for taking leaf and soil samples contained in document no. GPN-AGR-13-00.00 dated 01 August 2015 and No. GPN-AGR-14-00.00 dated August 1, 2015. Leaf sampling is carried out annually while soil sampling is carried out every five years. The analysis was carried out by the Selection Analysis Laboratory of the Genting Plantation Research Center (GPRC) located at PT SIsM Ketapang. The procedure states that fertilization recommendations should be based on analysis of leaf and soil samples.

The company shows the implementation document for taking leaf samples by analyzing the content of active cations, N, P, K, Mg, Ca, and B, including taking 18 samples of Leaf at PT SIsM on February 2022.

The company shows the implementation document for taking soil samples by analyzing texture (hydrometry), pH (pHmeter), C.Org (W&B titrimetry), N tot, K, Ca, Mg, Cu, Zn, Mn, Fe, CEC (FIA), Al-dd, H-dd including Taking 72 samples of soil at PT SIsM on February 18, 2021.

Based on the explanation above, it is concluded that the company records the activities of analyzing leaf tissue and soil samples on a regular basis.

7.4.3

The company shows a record of the realization of empty bunches at PT SIsM for the period January - December 2021 and January - June 2022, with details:

Location	Empty Bunch in PT SIsM	
	Tonage Jan – Dec 2021	
	Jan – Dec 2021	Jan – June 2022
Mulia 1-2 estate	86,729.19	34,792

The company also showed the realization of palm oil solid waste (POME) applications at PT SISM's Mulia 1-2 Estate for the period March 2022 of 2,434.35 tons.

7.4.4

The company shows records of fertilizer use in 2021 and the period January – June 2022. For example, records of fertilizer use from January 2021 - June 2022 are as follows:

Fertilizer Types	Application Jan-Dec 2021 (Ton)		Application Jan-June 2022 (Ton)	
	PT SIsM	PT SMA	PT SIsM	PT SMA
HGF Borate (48% B2O)	171	88	-	-
Urea	2,149	629	102.65	-
Muriate of Potash (60% K2O)	381	60	1,053.50	-
Super Dolomite	1,970	558	72.90	9
NPK Compound Hikay (13/6/27)	2,586	652	47.00	285
Rock Phosphate (Bayovar-29% P205)	169	373	414.65	-
Kieserite (27% MgO)	-	-	17.30	-

Based on the data above, it is known that the company has a record of using fertilizer every month

Status: Comply

7.5

Practices minimise and control erosion and degradation of soils.

7.5.1

The company shows a Terrestrial soil survey document and a 2014 High Conservation Value map which is equipped with a 1:50,000 scale map that identifies land conditions, topography and soil types, namely:

- PT SIsM: Based on a 1:50,000 scale topographic map the company has a topography of 15 Masl – 672 Masl (sloping to steep topography). Steep and hilly areas with an altitude of 343 Masl – 672 Masl are categorized as conservation areas (HCV). The soil types in PT SIsM based on the 1:50,000 scale soil type map are: Tropudults, Paleudults, Dystropepts, Haplorthox.
- PT SMA: Based on a 1:50,000 scale topographic map, the company has a topography of 15 Masl – 426 Masl (slope to steep topography). Steep and hilly areas with an altitude of 343 Masl – 426 Masl are categorized as conservation areas (HCV). The soil types in PT SMA based on the 1:50,000 scale soil type map are: Tropudults, Paleudults, Dystropepts, Tropaquepts, Haplorthox.

7.5.2

The companies explained that criteria of replanting could be due to several consideration, such as age of palms (>25 years old), low productivity (<10 ton FFB/ha/year), palm height (>12 m) and recommendation from Agronoist or other management consideration. However, based on year of planting data, it was known that palms in PT SIsM and PT SMA were planted from 2007 to 2016. Thus, based on year of replanting only, it was known that replanting activities will be conducted as early in 2032. Hence, there is no replanting program in the near future.

7.5.3

Based on document review, interviews and field observations during the RSPO ASA 3 + 4 onsite audit, there were no land clearing and new planting activities carried out by the companies.

Status: Comply

7.6

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

7.6.1

The company shows a Terrestrial soil survey document and a 2014 High Conservation Value map which is equipped with a 1:50,000 scale map that identifies land conditions, topography and soil types, namely:

- PT SIsM: Based on a 1:50,000 scale topographic map the company has a topography of 15 Masl – 672 Masl (sloping to steep topography). Steep and hilly areas with an altitude of 343 Masl – 672 Masl are categorized as conservation areas (HCV). The soil types in PT SIsM based on the 1:50,000 scale soil type map are: Tropudults, Paleudults, Dystropepts, Haplorthox.
- PT SMA: Based on a 1:50,000 scale topographic map, the company has a topography of 15 Masl – 426 Masl (slope to steep topography). Steep and hilly areas with an altitude of 343 Masl – 426 Masl are categorized as conservation areas (HCV). The soil types in PT SMA based on the 1:50,000 scale soil type map are: Tropudults, Paleudults, Dystropepts, Tropaquepts, Haplorthox.

7.6.2 & 7.6.3

The company carries out planting by implementing best soil management practices, such as trenching, contour terrace construction, contour road construction as stated in the infrastructure map document, namely:

- Map of road realization scale 1:50,000 in July 2022, it is known that PT SIsM has a total road length of 1,511,464 Mtr and PT SMA has a total road length of 701,809 Mtr
- Map of ditch construction with a scale of 1:50,000 in July 2022, it is known that PT SMA has a total field drain length of 960,063.32 Mtr and Main & collection drain 401,549.04 Mtr.
- Map of 1:50,000 scale terrace construction in July 2022, it is known that PT SMA has a total terrace length of 960,063.32 Mtr and PT SIsM has a total terrace length of 2,525,200.90 Mtr.
- Map of making Silt Pit scale 1:50,000 in July 2022, it is known that PT SIsM has a total silt pit length of 877,354.61 Mtr.

Status: Comply

7.7

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

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

Based on information from estate management, verification on HCV report dated November 2014 and Soil and Water Conservation Implementation of PT SISM and PT SMA Report dated April 2016, it was known that there is no presence of peat soils within PT SISM and PT SMA operational areas. Thus, this Indicator is not applicable.

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The company has identification on water course within its operational area in HCV document and there is also water management plan covered in HCV management plan, environmental management & monitoring plan document (RKL/RPL document), riparian management & monitoring procedures. Among other the plan covers determination of riparian area border, protection of riparian area by not conducting chemical spraying and tree enrichment. The action taken among other by testing periodically river water quality, monitoring volume of water use, applying treated mill effluent to permitted land application.

Company also regularly conducted water quality testing every semester (based on RKL/RPL matrix) consist of :

PT SISM

- Pawan river (upstream & downstream)
- Tayap river (upstream & downstream)
- Engkadin river
- Udan river
- Mangkat river
- Penyauh river
- Caku river
- Tapal river (upstream & downstream)

PT SMA

- Pawan river (upstream & downstream)
- Benepis river
- Lekahan river
- Belian Berdarah river

Document review showed that semester 2 2021 testing results for all river quality dated 21 October 2021 to 39 parameters are still compliant with standard quality (government regulations Number 22-year 2021) appendix VI water class 2.

The company also conducts groundwater quality testing. Results of water hygiene sanitation quality analysis of PT. SISM and PT SMA on October 6, 2021. Based on the results of the test to 28 parameters, no parameter exceeds the threshold value determined in accordance with the Minister of Health Regulation No. 32 of 2017 appendix 1.

Based on workers interviews on estate housing shown that drinking water for them originated from ground water and mill also provides clean water access for all workers and not limit access to clean water.

7.8.2

The company has procedures for protecting riparian zones and buffer zones which are described in several documents, namely:

- The 2022 HCV plan management document is known to PT SMA and PT SISM explaining the HCV area management and monitoring plan. The 2022 HCV management plan explains several programs, namely:
 - Installation of HCV signboards and inventory at the end of each year.
 - Monthly HCV limit marking
 - Outreach to employees and the community
 - HCV monitoring
 - And evaluation, every year end

- Implementation document of HCV management and monitoring implementation report in 2022, all programs have been realized.
- SOP for Determination and Management of riparian no. SOP/GPN/14 was issued November 1, 2016 which explains the determination of the width of riparian according to Presidential Decree 32 of 1990 for large rivers with border widths (right & left) and small rivers with a river width of 50 meters (right & left). The marking of river boundaries is by installing stakes whose ends are marked with paint colors with a stake of 100 cm high or by painting on trees.
- The PT SMA HCV report compiled in November 2014 explained that the HCV areas identified in PT SMA Plasma 1 for attribute 4.1 are Belian Bedarah River, Danau Pasir River, Majo River, Miau River, Kenahare River, Plakenan River and Benipis River. Based on this document, recommendations for riparian management are recommended, namely the prohibition of the application of chemicals on riparian.
- Internal office memo no: 001/RO/IX/2021 dated September 15, 2021, at point 8 explains that riparian are not allowed to apply chemicals including pesticides with a distance of 50-100 from the riparian.

However, based on the results of field visits in the HCV area, it was found that at the Danau Pasir riparian there was evidence that pesticide spraying activities had been carried out on the Danau Pasir riparian, where the results of the verification of the document for the Foreman Activity Book / Abadi Estate Supervision 1 plasma division dated 7 June 2022, explained that it had Chemical application activities (CPT) were carried out in block I08.

The company has not been able to show evidence that the implementation of the riparian zone and buffer zone protection plan has been in accordance with the predetermined plan. **Based on that's explanation raised Non-Conformity No 2022.05 with Major Category**

7.8.3

The company has carried out periodic monitoring of the quality of mill effluent in accordance with applicable regulations. The results of testing the quality of wastewater for the period Januari 2021 – June 2022 where the pH and BOD parameters were still below the quality standard (KepmenLH No 29 year 2003).

PT. SISM has a POME land application permit, based Statement Letter of Fulfillment of PT Sepanjang Intisurya Mulia dated No.660.1/081/DPMPSTSP-D/2021 One-Stop Integrated Service and Investment Service dated March 15, 2021. The permit covered on 217,99 Ha at PT Sepanjang Intisurya Mulia Estate. The company has also shown a Commercial/Operational Permit for Disposal of Wastewater issued through the OSS system and issued by Regent of Ketapang on March 15, 2021 (printed on March 16, 2021) valid as long as there are no operational changes.

7.8.4

The procedure of water uses monitoring in mill available under document Procedure of Water Treatment Plant. Water consumption monitored by using flowmeters installed in the piping system of WTP. Based on document verification water consumption record for period January until December 2021 freshwater usage to process 34,539 m³ and mill fresh water per produced tonne 1.2 M³ / MT FFB, with standard 1.4 M³ / MT FFB.

The company has a water resources exploitation permit in accordance with the Decree of the Head of the Investment Service and one-stop integrated servant of West Kalimantan Province Number: 503/01 / SDA / DPMPSTSP-C / 2017 concerning the granting of water resources exploitation permits to PT. Sepanjang Intisurya Mulia for palm oil mill production in Sungai Pawan, Ketapang Regency, West Kalimantan Province on March 6, 2017, it is valid for 10 years. The company has also paid a surface water levy to the Ketapang Regional Revenue Agency for payments for the months of January-May 2022.

7.8.2	Status : Non-Conformance number 2022.05 with major category
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7.9 Efficiency of fossil fuel use and the use of renewable energy is optimized.

The unit certification already maximizing the use of renewable energy (fiber & shell) as boiler fuel. For example, use of shells and fiber period January to December 2021 POM has produces 1,128,749 kWh of electricity from turbine. Renewable energy use per ton of palm product in the mill is 11.13 kwh / ton CPO. Result Direct fossil fuel used is 0.10 kWh/ ton CPO.

Status: Comply

7.10

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

7.10.1

The company has identified source of pollution and air emission sources, including gaseous, particles and shoot emissions and effluent covering emissions and pollution sources from estate and mill operations. The emission source identified from estate and mill operation among others are land use change, vehicle operation, machine operation, fertilizer and pesticide application, use of AC/refrigerator, waste piling and electricity consumption.

Identification of significant GHG gas emission source is identified, and the mitigation plan has been developed by the company covering mill and estate. The significant GHG emission among others are land use change, POME, use of fertilizer and pesticide, use of fossil fuel for operation and transport. The mitigation plan among others is correct dosage use for fertilizer and application as recommended, reduce reuse and recycle action, electric use limitation, transport and engine maintenance, periodic air quality test.

Fossil fuel reducing on MOM have been implemented by fiber/shell usage for boiler. POME has been monitored every month and monitoring periods January 2021 to June 2022 shown that all of POME testing parameters is compliant to the standards quality.

Based on document review for examples: pesticides usages monitoring, diesel fuel monitoring, HCV identification and etc. found that accurate data has been put into the RSPO palm GHG Calculator.

The calculation of GHG and its monitoring has conducted by EHS department. GHG emission calculated using RSPO palm GHG calculator 4.0 Summary of GHG emission for MOM and its supply base are listed as follows:

Summary of Net GHG Emissions

Emissions per product	tCO2e/tProduct
CPO	7.68
PK	7.68

Production	t/yr
FFB processed	322,174.01
CPO produced	72370.85
PK produced	12372.31

Extraction	%
OER	22.46
KER	3.84

Land use	Ha
Planted area	23,496.63
Planted on peat	0
Conservation Area (Forested)	3537.65
Conservation Area (Non-Forested)	0
FFB Production per hectarage	13.71

Summary of field emission and Sinks

Description	Own crop		Group		3rd	Total
	tCO2e	tCO2e/ tFFB	tCO2e	tCO2e/ tFFB		
Emissions						
Sources						

Land conversion	359472.98	1.32	105674.43	2.15	0	465247.41
CO2 emissions from fertilizer	10896.60	0.04	761.93	0.02	0	11658.53
N2O emissions from peat	0	0	0	0	0	0
N2O Emissions from Fertilizer	14179.95	0.05	465.08	0.01	0	14645.03
Fuel consumption	5469.48	0.02	1335.81	0.03	0	6805.29
Peat oxidation	0	0	0	0	0	0
Sinks						
Crop sequestration	-170001.96	-6.62	-49967.24	-1.02	0	-219969.20
Sequestration in Conservation area	-19171.08	-0.07	-13269.17	-0.27	0	-32440.25
Total	200845.97	0.74	45000.85	0.92		245846.82

Summary Oil Mill Emissions and Credits

Remarks	tCO2e	tCO2e/t FFB
Emissions sources		
POME	402723.52	1.25
Fuel consumption	569.40	0
Grid electricity	1390.26	0
Credits		
Export of grid electricity	-137.76	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	404545.42	1.25

Palm Oil Mill Effluent (POME) Treatment

Divert to compost (%)	0
Divert to anaerobic digestion (%)	100

POME Divert to Anaerobic Digestion

Divert to anaerobic pond (%)	100
Divert to methane capture (flaring) (%)	0
Divert to methane capture (electricity generation) (%)	0

Based on the explanation of the table above, it is explained that the HCV area is not similar with basic info data because the reason is that there is an additional HCV area from another company as supply base that is still in the same group, with total HCV area 1447.02 ha, namely PT (see TBP):

- PT. SAP (Surya Agro Palma).
- PT. CSC (Citra Sawit Cemerlang)
- PT. AAC (Agro Abadi Cemerlang)
- Plasma PT. CSC (Citra Sawit Cemerlang)

- Plasma PT. AAC (Agro Abadi Cemerlang)

Afterward, for planted area on GHG palm calculator 23496.63 Ha is different by basic info 18,159.24 Ha because there is FFB other source (planted area calculating) included on calculation period 2021.

Based on the results of the field visit, information was obtained that there were Palm Oil Mill Effluent (POME) Treatment activities, namely the use of part of the POME for watering EFB in the EFB processing process into compost.

7.10.2

Base on interview with representative company and document review "hectare statement 2022" The company did not develop new land after 2014, for planting on 2014- 2016 is replanting.

7.10.3

The company has identified pollutions and emissions sources of MOM for the period 2021, such as CO2 (boiler, generator, transportation), CH4 (POME), hazardous waste (WTP, chemical storage), noise (machinery). The sources of pollution and emissions for the estate are listed on the identification documents and management plans for pollution sources for the period 2020, such as emissions (CO2, CO), noise, chemical waste, organic and inorganic waste, and infectious waste.

Plans to reduce or minimize have been implemented and monitored as explained in RKL-RPL semester I & II 2021. Fossil fuel reduction on MOM have been implemented by fiber/shell usage for the boiler.

Status: Comply

7.11

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

7.11.1

The company shows a record of the Prohibition of Burning policy which was approved by the President Director on October 18, 2012. The company also shows SOP No. OPM 01 regarding land clearing, preparation, planting and planting nuts, in the SOP it is stated that land burning is not allowed. All untidy wood must be cut and stacked neatly away from the road.

Based on document review, interviews and field observations during the RSPO ASA 3 + 4 onsite audit, there were no replating, land clearing and new planting activities carried out by the company.

7.11.2

The company has SOP for Emergency Preparedness and Response with document number SOP/SMA/SHE05. Rev 0.01 was passed on February 1, 2020. This SOP aims to define approaches, structures, responsibilities and procedures for preparing and responding to emergencies in order to minimize the impact of an emergency on employees, the community and the environment.

The document also describes the organizational structure of Emergency Response which consists of Emergency Response Manager, Secretary, Incident Commander, Internal Relations, External Relations, First Aid and Logistics.

The company has fire facilities and infrastructure as indicated in the Fire Fighting Condition document for July 2022. Based on this document, it is known that fire control facilities and infrastructure are in accordance with the available laws and regulations, such as hydrants, fire extinguishers, fire tank trailers, water pump machines, hoses, nozzles, gloves, masks, goggles, helmets, boots, fire suits, hoes, rakes, weevils, machetes, flashlights, fire watch towers.

The company has budget documents and the realization of Sustainability in 2022, including the budget and the realization of the purchase of Fire Extinguisher CO2 5 Kg (2 units), Refill Fire Extinguisher powder 5 Kg (55 units), Refill fire extinguisher CO2 5 Kg (2 units), Small fire extinguisher for small vehicles (40 units).

Based on observations at the Mulia Oil Mill, it is known that the hydrant is functioning properly and firefighters can simulate it well.

7.11.3

The company shows evidence of recorded socialization of forest and land fire prevention which is carried out routinely in the plantation areas of PT SIsM and PT SMA, both to employees and to the surrounding community. Socialization activities to employees are carried out during the morning checkroll in each division delivered by the Assistant of each Division. Meanwhile, socialization to the community is carried out by coordinating with stakeholders.

The company also showed evidence of recordings of training and simulation activities for members of the company's Emergency Response Team, Naga Tayap District Leadership Conference (*Muspika*) and Village Heads and Village Community held jointly at PT SIsM on August 19, 2021.

The company has a Fire Care Community program, namely:

- PT SMA, consisting of 15 people from Mensubang Village, 15 people from Tanjung Medan Village and 15 people from Pangkalan Teluk Village.
- PT SIsM, consisting of 10 people from Mensubang Village, 10 people from Pangkalan Teluk Village, 15 people from Sepakat Jaya Village and 15 people from Pangkalan Suka Village.

Based on the explanation above, it is concluded that the company involves stakeholders in locations adjacent to the company for fire prevention and control measures.

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

Genting Plantation BHD has prepared a "Reporting Template for Zero Liability Management Unit" document on 31 July 2014 including for PT SISM and PT SMA and this document has been sent to the RSPO secretariat. There was an email from the RSPO dated 23 October 2017 where it was explained that LUCA PT SISM & PT SMA had been received by RSPO without having to go through a compensation procedure, but there was an area of 77.83 Ha on the riverbank that was open from November 2005 to November 2007. The Compensation Panel has approved remediation plan dated 23 Oct 2017.

7.12.2

PT. SISM and PT. SMA does not conduct new land clearing after 15 November 2018, so the existing HCV assessment is still valid and the HCS assessment is not applicable. PT SISM has carried out a HCV assessment done by YASBI in 2009 and conducted a HCV re-identification by PT Sonokeling Akreditasi Nusantara in 2014. PT SMA carried out a re-identification of HCV in 2014 done by PT Sonokeling Akreditasi Nusantara.

The HCV assessment refers to the HCV Identification Guidance in Indonesia published by the Revised HCV Toolkit Consortium Indonesia, 2008. Public consultations have been carried out to the surrounding communities, namely Mensubang village, Teluk Kramat, Pangkalan Teluk, Pangkalan Jihing, Pangkalan Suka, Sukamaju Sub-village, Pangkalan Suka village, Plasma Sawit Harapan Jaya Cooperative Unit. Peer Review was conducted by Comparative Expert Dr. Jarwadi Budi Hernowo in January 2015 with the results as attached to the HCV assessment document. The identification results show that in PT SISM was identified as 1233.13 Ha, while PT SMA was identified as 857.50 Ha.

PT SIsM identified as many as 11 species of flora which are protected and endangered species (Appendix 1CITES) such as *Dendrobium sp*, *Dorio ketejensis*, *Dipterocarpus costatus*, *Shorea palembanica*, *Shorea almon*, *Shorea leprosula*, *Shorea acuminatissima*, *Shorea hopefilia*, *Shoreayphyllenen stlll*, *Eusideroxylon zwageri*, *Shorea almon*, *Shorea acuminatissima* and *Shorea hopefilia*. There are 56 species of birds, 11 species of mammals and 4 types of reptiles, none of which are included in the CR category based on the IUCN Redlist.

In PT SMA there were 8 species of rare / protected birds, 10 species of mammals and 4 species of reptiles identified (according to the 2014 IUCN Red List, CITES 2014 and Government Regulation No. 7 of 1999). There are plant species with Endangered (EN) status based on IUCN 2014.3, namely *Shorea dasyphylla* Foxw and *Dipterocarpus costatus*. While *Eusideroxylon zwageri* IUCN is included in the Vulnerable (VU) category and based on CITES is in the Appendix II category.

Based on the verification of PT SISM's 2014 HCV identification report conducted by PT SAN, it was found that the scope of the HCV study was smaller than the \pm 300 Ha of PT SISM's HGU. So that the management of PT SISM decided to exclude the area from the scope of certification.

7.12.3

Base on document submitted by Proforest namely RSPO No deforestation consultancy: high forest cover countries, Consultancy report on definitions and recommendations to the RSPO June 2018 as known not set HFCL for Indonesia.

7.12.4

The HCV management plan is contained in the document:

- The 2022 HCV plan management document is known to PT SMA and PT SISM explaining the HCV area management and monitoring plan. The 2022 HCV management plan explains several programs, namely:
 - Installation of HCV signboards and inventory at the end of each year.
 - Monthly HCV limit marking
 - Outreach to employees and the community
 - HCV monitoring
 - And evaluation, every year.
- SOP for Determination and Management of riparian no. SOP/GPN/14 was issued November 1, 2016 which explains the determination of the width of riparian according to Presidential Decree 32 of 1990 for large rivers with border widths (right & left) and small rivers with a river width of 50 meters (right & left). The marking of river boundaries is by installing stakes whose ends are marked with paint colors with a stake of 100 cm high or by painting on trees.
- The PT SMA HCV report compiled in November 2014 explained that the HCV areas identified in PT SMA Plasma 1 for attribute 4.1 are Belian Bedarah River, Danau Pasir River, Majo River, Miau River, Kenahare River, Plakenan River and Benipis River. Based on this document, recommendations for riparian management are recommended, namely the prohibition of the application of chemicals on riparian.
- Internal office memo no: 001/RO/IX/2021 dated September 15, 2021, at point 8 explains that riparian are not allowed to apply chemicals including pesticides with a distance of 50-100 from the riparian.

Implementation document of HCV management and monitoring implementation report in 2022, all programs have been realized, however, based on the results of field visits in the HCV area, it is known that:

- Was found that at the Danau Pasir riparian there was evidence that pesticide spraying activities had been carried out on the Danau Pasir riparian, where the results of the verification of the document for the Foreman Activity Book / Abadi Estate Supervision 1 plasma division dated 7 June 2022, explained that it had Chemical application activities (CPT) were carried out in block I08.
- There is no clear marking of HCV area boundaries in HCV areas for example in the boundaries of the Danau Pasir and Mentiakawn riparian rivers.

The company has not been able to show evidence that the implementation of the HCV area management and monitoring plan has been in accordance with the predetermined plan. **Based on that's explanation raised Non-Conformity No 2022.06 with Major Category**

7.12.5

There are no set-aside HCV areas within PT SISM and PT SMA. According to the results of HCV identification and maps, it is known that all HCV areas of PT SISM and PT SMA are within the company's HGU, there are areas designated as HCV6 (local cultural values), which these areas have been based on agreement with the local community. There is evidence of agreement on lake area management with indigenous peoples, namely:

- Mutual agreement on the designation and management of an area that has an important function of the traditional cultural identity of the local community of Dusun Suka Maju within the PT SISM oil palm plantation area on March 15 2018 (*Bukit Senudan, Bukit Gemilang and Danau adat Membuyak*).
- Mutual agreement on the establishment and management of an area that has an important function of traditional cultural identity of the local community of Dusun Pebantan with PT SISM on March 15 2018 (pekawal omas' sacred grave, Upuy grave, Jurong Igu and Mentoreng grave).
- Joint agreement on the establishment and management of an area that has an important function of the traditional cultural

identity of the local community of Engkadin Hamlet on March 15 2018 with PT SISM (Gemilang hill, Semberuang Hill customary forest, Upuy grave, Ngulok Belaba grave and Buraian Molau grave).

7.12.6

The company has a policy to protect flora and fauna listed in the SOP for the protection of protected wild plants and animals with document number SOP / GPN-S / 02 dated January 9, 2017. The SOP has explained that it is related to the prohibition for anyone to catch, injure, kill, store, own, maintain, transport and trade protected animals and plants. There is also an explanation regarding the sanctions if there is a violation of these things, namely in the form of layoffs (against employees) and crimes in accordance with applicable regulations.

Socialization to employees has been carried out by the company, namely on February 21, 2021 (PT. SISM) and March 7, 2022 (PT. SMA). In addition, socialization is also carried out through signboards installed in strategic locations (offices and other buildings including employee housing). Based on the results of interviews with employees, it is known that the employee has understood the prohibition and sanctions policies, and during field observations at the employee's housing, there were no employees who arrested, injured, killed, kept, owned, maintained, transported and traded protected animals and plants.

The company has been conducting routine patrols, security is responsible for carrying out daily patrols. In addition, there is also monitoring that is carried out every month by the foreman and a patrol report is prepared by Sustainability. If there is illegal hunting and disturbance of the HCV area, then action will be taken in the form of sanctions and legal action.

For example, RTE patrols summary results on 2021 for conservation area on Kaos riparian such as *landak (hystrix brachyura)*, *elang tikus (elanus caeruleus)*, *enggang kilihingan (anorhinus galeritus)*, and *Tiong Emas (Gracula religiosa)*. Meanwhile flora species trap is *Lanan (shorea rugosa)*, *ramin (gonystylus bancanus)*, and *kantong semar (nepenthes sp)*.

Based on the results of field visits and interviews with employees, it is known that they have understood the protection of flora and fauna which is socialized by the company.

7.12.7

In an effort to improve the status of HCV and RTE species the company is undertaking several monitoring efforts. As for the efforts made are:

- Conduct an inventory of flora and fauna diversity. PT. SISM has carried out an inventory of flora and fauna for semester 1 of 2022 on 21-24 February 2022. From the results of the inventory there are 26 types of wildlife including 5 types of mammals, 2 types of reptiles, 19 species of Aves. As for PT. SMA inventory results, there are 62 species of wildlife including 14 species of mammals, 4 species of reptiles, 44 species of Aves.
- Signboard monitoring. PT. SISM and PT SMA have carried out signboard maintenance in the HCV area such as prohibition of hunting, cutting, poisoning, protected species, prohibition of burning and identification of HCV. Based on the results of monitoring, it is known that there is no hunting of animals and no traps.
- Outreach to employees. PT. SISM has conducted socialization for employees on February 21, 2022 for wildlife protection, while for PT. SMA was held on March 7, 2022. This was done as an effort to provide education to workers about the protection of protected flora and fauna.

Based on interviews with management representatives, it was found that monitoring of HCV areas, including monitoring of plant and animal species, is still being carried out as part of the company's efforts to maintain HCV areas as well as plant and animal species.

7.12.8

The company has prepared a Remediation Plan for SIMP (Subsidiary of Genting Plantation Berhad) which was sent to the RSPO Secretariat and was approved on August 14, 2017 in accordance with the email from RSPO Compensation (rspocompensation@rspo.org) which states that "The Panel agreed that this remediation plan is sufficient and an annual up date must be provided the CP to show the Progress of the remediation activities".

Companies can show a report on the implementation of the RSPO remediation until the period of June 2022, that is, the marking of riparian has been carried out throughout all riparian, especially the tapal river (the area which remediation requires), monitoring of plant species has been carried out, socialization of conservation and capacity building of human resources involved in HCV

management as well as to employees of PT. SISM and PT. SMA through socialization and training, placement of signboards for HCV area markers and prohibition boards for HCV areas, implementing rehabilitation (forest plant nurseries) and rehabilitation plant nurseries. The company has planted rehabilitation plants starting in 2019 with types of Durians, Langsung, Kemiri, mentawa, gaharu, ketum, Pelanjau, tengkawang and putat with a total of 1025 planted in the Penahara riparian and the Tapal riparian, until the ASA-4 (years 2022) audit is carried out the plant is still take care and grow.

7.12.4	Status: Non-Conformance number 2022.06 with major category.	
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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-3 & ASA-4	The CH did not use trademark and/or RSPO logo	√
	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-3 & ASA-4	The CH did not use trademark and/or RSPO logo	√
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or √
ASA-3 & ASA-4	The CH did not use trademark and/or RSPO logo	√
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or √
ASA-3 & ASA-4	The CH did not use trademark and/or RSPO logo	√
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of Genting Plantation Bhd 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.

Genting Plantation Bhd Time Bound Plan (TBP) is explained in table 1.10. Genting Plantation Bhd has 32 management units with 15 mills. Genting Plantation Bhd has informed the TBP progress, MUTU has considered that Genting Plantation Bhd is complied with the RSPO requirement for TBP.

MUTU has verified partial certification for un-certified unit's subsidiary of Genting Plantation Bhd based on their Time Bound Plan. There are 8 uncertified mills and 30 uncertified estates of Genting Plantation Bhd. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There are no significant land conflicts which have not been declared above
- The company has followed RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There are 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

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?	Yes and positive assurance is developed under Genting Plantation Bhd <i>Auditor verification</i> Based on the document review, there is a company pre audit that was conducted by SGS and the positive assurance is at this table that is also been verified.
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. 	Total of 4 LUCA was submitted to RSPO Secretariat. PT SISM, PT GAL, GKCE & GJBE PT SISM: Social remediation (Concept Note submitted to RSPO in November 2016. Pending review & approval by Panel. PT GAL: Noncommercial clearing. LUCA pending approval by Panel. GKCE: ~498 Ha for compensation. LUCA pending approval by Panel. GJBE: Social remediation (487 Ha). LUCA pending approval by Panel. <i>Auditor verification</i> Based on evidence, the Genting Plantation Group has followed the requirement of RSPO.

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	NPPs have been submitted for new plantings since Jan 2010. The latest NPP was published on RSPO website on 13 July 2016 for Genting Jambongan Estate in Sabah for an expansion of the estate areas.
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.	No outstanding land conflicts Auditor verification Based on evidence provided, the company merely conducted planting on the area that has been compensated from the land owner by FPIC. The documentation of each land compensation/leasing is documented.
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	There is no labor disputes. There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries. Auditor verification There is no indication of labor disputes. There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries and also from stakeholder consultation during 2 nd surveillance audit of the PT SisM and PT SMA.
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.	Yes, there is process for land legality. Auditor verification Land legal process is still going on and there is a detail update progress documented by the company for each year.

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

3.4.1. Identification of Findings, Corrective Actions and Observations at ASA-2 Assessment

NCR No.	:	2020.1	Issued by	:	Briyogi Shadiwa
Date Issued	:	6 November 2020	Time Limit	:	ASA-3
NC Grade	:	Minor	Date of Closing	:	24 August 2021
Standard Ref. & Requirement	:	Non-Critical 2.2.2 All contracts have separate clauses regarding the fulfillment of applicable legal obligations, and are indicated by the third party concerned			
<p>Evidence observed (filled by auditor): The results of document verification work agreements with contractors, for example the Panca Mitra Abadi Cooperative and CV Restu Ibu, there is a clause that "Must comply with and obey all the provisions of the competent authorities as well as applicable government regulations". In addition, to ensure compliance with regulations by contractors, the company has SOP for OHS Procedures for Visitor Contractors and New Employees (No. SOP/SMA/SHE19 & No. SOP/SISM/SHE19 dated February 1st 2020). Here are the things that must be obeyed:</p> <ul style="list-style-type: none"> - General Regulations for Occupational Health and Safety - Driving Regulations and Accident Emergency Response - BPJS (Insurance) - Remuneration - Minimum age worker (18 years old) - And others. <p>The procedure also explains that the unit management (SHE Department and related departments) will carry out periodic monitoring of the contractor to find out the extent to which the contractor complies with the safety and health regulations of the company's work environment.</p> <p>However, there is not enough evidence that all contracts have fulfilled the applicable legal obligations as stated in the work contract and company procedures. In addition, the company has not shown the contractor any periodic monitoring records</p>					
<p>Non-Conformance Description (filled by auditor): There's no enough evidence that all third parties had fulfilled all applicable legal obligations.</p>					
<p>Root Cause Analysis (filled by organization audited): There are 2 versions of the contract with the contractor, 1 made Legal by HO in Jakarta and 1 made by Local/ site. Local contracts do not have complete clauses according to SOP and RSPO standards. Because agreement is made simpler to adjust to the type of contractor (especially local contractors).</p> <p>There has been no PIC for implementation of the assessment</p>					
<p>Correction (filled by organization audited): Local agreement format was revised in accordance with the existing SOP and revised contracts.</p> <p>Preparation of forms and conducting contractor assessments on a regular basis and periodically all contractors operating in the work areas of PT.SISM and PT.SMA</p>					

Corrective Action (filled by organization audited):

Ensure the agreement follows the SOP by HR verifying the agreement before being signed by the hear of company.

Ensure regular and periodic contractor assessments of all operating contractors in the PT.SISM and PT.SMA work areas by the user.

Assessor Evaluation and Conclusion (filled by auditor):

Verify August 24, 2021

CH has shown local agreement an Effendi No. 001/ SISM – M1&2/ SPK/ I/ 2020 dated January 2, 2020, where in article 9 it is explained that:

- Provide PPE free of charge to employees according to their work.
- Not employing employees under the age of 18 or not yet married
- Involve employees in BPJS Employment and BPJS Health programs

In addition, the company also shows a contractor assessment evaluation form that provides information related to:

- Legal aspects: ID Card, Tax Number Register, company certificate
- Production aspects: quality of work, quantity of production, timeliness of production, availability of work equipment, competence of workers
- OHS and environmental aspects: availability of PPE, cleanliness of work and living areas, awareness of OHS and environmental aspects, other points refer to OHSE inspections
- Employment Aspects: BPJS for employment, BPJS for health, wages for workers, age of workers, protection for children.

Based on this explanation, the non-conformance is **Closed**

Verified by : **Ardiansyah**

NCR No.	: 2020.02	Issued by	: Rahmat Abdiansyah
Date Issued	: 06 November 2020	Time Limit	: 04 February 2021
NC Grade	: Major	Date of Closing	: 01 February 2021
Standard Ref. & Requirement	: 3.4.3 Critical The social and environmental management and monitoring plan is implemented, monitored and updated periodically in a participatory manner.		
Non-Conformance Description & Evidence observed (filled by auditor):			
<ul style="list-style-type: none"> • AMDAL Addendum Document (RKL/RPL) related to the addition of the processing capacity of Mulia Oil Mill PT Sepanjang Intisurya Mulia from 60 tons of FFB/hour to 90 tons of FFB/hour in 2016 has been approved by the Decree of the Regent of Ketapang No. 031/DPMPSTP-D.B/2018 dated January 23, 2018. Several management and monitoring plans required by the addendum include: <ul style="list-style-type: none"> - Decreased air quality - Noise improvement - Decreased water quality - Increased business opportunities - Increasing people's income - Attitudes Changes and Public Perception - Public health problems 			

<p>- Work accident</p> <ul style="list-style-type: none"> Based on the results of the review of PT SISM's first semester of 2020 RKL/RPL implementation documents, it is known that there are several types of environmental impact management and monitoring activities that have not been carried out by the company, including: Increasing Community Income, as well as changing public attitudes and perceptions. <p>Non-Conformance Description (filled by auditor): The unit of certification has not been able to show evidence that all environmental management and monitoring plans have been implemented in accordance with the existing RKL/RPL Matrix.</p>
<p>Root Cause Analysis (filled by organization audited): There is no PIC for Environmental Management and Monitoring in the Social Community sector.</p>
<p>Correction (filled by organization audited): Improvement of PT.SISM's RKL-RPL reporting in accordance with the online RKL/RPL Matrix through the Environmental Electronic Reporting Information System (SIMPEL).</p>
<p>Corrective Action (filled by organization audited): Make the appointment of a person in charge and a coordinator for each aspect of environmental management and monitoring.</p>
<p>Assessor Evaluation and Conclusion (filled by auditor): Verify January 20, 2021 The certification unit has sent proof of improvement in the form of Online Evidence of PT Sepanjang Intisurya Mulia's RKL-RPL Report (Company ID No. 5387) in the form of Electronic Receipt (TTE) Environmental Electronic Reporting Information System (SIMPEL) Ministry of Environment and Forestry with ID TTE No. 1609906088-5387; TTE period 01 July 2020 s.d. 31 December 2020; and TTE Printing Time dated January 6, 2021. However, no evidence has been shown that all the activities required in the RKL/RPL Matrix have been implemented entirely. In addition, the root cause analysis and corrective actions provided were assessed as not yet relevant to the Non-conformance record. Accordingly, the record of Non-conformance No. 2020.02 is considered unfulfilled.</p> <p>Verify February 01, 2021 The unit of certification has sent proof of improvement in the form of:</p> <ul style="list-style-type: none"> Letter of appointment of environmental management and monitoring officer of PT. Sepanjang Intisurya Mulia for each aspect, namely the Coordinator, Social Aspects, Employment, K3 and aspects of PKS which have been approved by the company leadership. Report on the implementation of RKL/RPL semester 2 of 2020 PT. SISM. Based on the verification of the report on the implementation of the RKL/RPL Semester 2 of 2020, it is known that it is in accordance with the RKL/RPL matrix in the environmental documents owned, such as: <ol style="list-style-type: none"> Decreasing Air Quality Noise Enhancement Decreasing Water Quality Increased business opportunities Increasing people's income Attitudes Changes and Public Perception Public health problems Work accident. <p>Based on this explanation, the discrepancy in this indicator is declared to have been fulfilled.</p>

Verified by	: Rahmat Abdiansyah and Mohamad Amarullah
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NCR No.	: 2020.03	Issued by	: Rindu Galih Rezza Rachmansyah
Date Issued	: 06 November 2020	Time Limit	: 04 February 2021
NC Grade	: Major	Date of Closing	: 02 February 2021

Standard Ref. & Requirement	: 3.6.1 Critical All operating activities are assessed for risk to identify OHS problems. Mitigation plans and procedures are documented and implemented.
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Evidence observed (filled by auditor):

- Mulia Oil Mill has two (2) turbine engines and three (3) generator sets with each capacity above 200 kVA at the Engine Room Station. There are three (3) operators on duty at the station and work for three (3) shifts every day. However, only one (1) person has the SIO for Power and Production Aircraft Operators. This is not in accordance with the Minister of Manpower Regulation No. 38 of 2016.
- Mulia Oil Mill has two (2) turbine engines and three (3) generator sets with each capacity above 200 kVA at the Engine Room Station. However, there is no Electric OHS Expert in accordance with the Minister of Manpower Regulation No. 12 of 2015.
- PT Sepanjang Inti Surya Mulia (plantation) has as many as six (6) generator engines and PT Sawit Mitra Abadi has as many as one (1) generator engine with a capacity of 30 kVA – 135 kVA. However, workers who have SIO Power and Production Aircraft Operators have not been shown in accordance with the Regulation of the Minister of Manpower No. 38 of 2016.
- Mulia Oil Mill has two (2) Boiler machines (steam boilers) with a capacity of 35 tons/hour (standby) and 45 tons/hour (used) at the Boiler Station. There are six (6) operators on duty at the station and they work for two (2) shifts every day. However, only two (2) workers have SIO Boiler Operator Class 1. This is not in accordance with the Regulation of the Minister of Manpower No. 01 year 1988.

Non-Conformance Description (filled by auditor):

The unit of certification has not been able to show evidence that operators with specific OHS qualifications/competencies have been identified as regulated in PP No. 50 of 2012 Article 12.

Root Cause Analysis (filled by organization audited):

- The identification and preparation of programs related to the fulfillment of OHS competencies has not been carried out.
- No one has yet monitored the fulfillment of OHS competencies.

Correction (filled by organization audited):

- Identify operator needs and competency requirements.
- Create a OHS competency training program in accordance with the 2021 TNA (Training Need Analysis).
- Determine the responsible PIC (SHE Officer) for this implementation.

Corrective Action (filled by organization audited):

- Identify operator needs and competency requirements.
- Create a OHS competency training program in accordance with the 2021 TNA (Training Need Analysis).
- Determine the responsible PIC (SHE Officer) for this implementation.

Assessor Evaluation and Conclusion (filled by auditor):

Verify January 24, 2021

The unit of certification shows some evidence of improvement, including the following:

- Minutes of Implementation of Development and Testing of Production Power Aircraft Operators OHS License on December 12, 2020, for ten (10) Operators. The training was held on 10-12 December 2020 by PT Safetindo Gemilang Abadi Pontianak together with the Manpower Supervision of the West Kalimantan Province Manpower Office.
- Minutes of the Implementation of the Construction and Testing of the Steam Boiler Operator OHS License on December 12, 2020, for four Operators. The training was held on 10-12 December 2020 by PT Safetindo Gemilang Abadi Pontianak together with the Manpower Supervision of the West Kalimantan Province Manpower Office.
- Electrical K3 Expert Registration Form dated January 16, 2021, for employees currently occupying the position of Electrical Assistant. The training was carried out by PT Mitra Dinamis Yang Utama in Jakarta.

Verify February 02, 2021

The unit of certification has shown additional evidence as follows:

- OSH work program in 2021 (ratified by the General Manager on January 30, 2021) which includes plans for implementing training related to the fulfillment of mandatory OHS competencies such as operators of production power aircraft, steam aircraft, and electric OHS.
- Training Need Analysis (TNA) and 2021 OHS Competency Training Program which was approved by the General Manager on January 30, 2021.
- OHS competency monitoring form for PT Sawit Mitra Abadi in 2021 which will be monitored by SHE Officer.
- OHS competency monitoring form for PT Sepanjang Intisurya Mulia in 2021 which will be monitored by the SHE Officer.

Based on the explanation and evidence of improvement provided, **the discrepancy No. 2020.03 is declared to have been fulfilled.**

Verified by : **Rindu Galih Rezza Rachmansyah and Mohamad Amarullah**

NCR No.	: 2020.04	Issued by	: Rindu Galih Rezza Rachmansyah
Date Issued	: 06 November 2020	Time Limit	: 04 February 2021
NC Grade	: Major	Date of Closing	: 24 January 2021
Standard Ref. & Requirement	: 3.7.1 Critical There is a documented training program available for all staff, workers, smallholders and outgrowers that takes into account gender-specific needs and covers aspects of the RSPO principles and criteria in a form that they can understand and includes an assessment of the training.		
Evidence observed (filled by auditor): The unit of certification already has identification and training programs for all workers (staff and employees) for the period of 2020, but for plasma farmers and outgrowers it has not been shown.			
Non-Conformance Description (filled by auditor): The unit of certification has not been able to prove that a documented training program for smallholders and outgrowers that takes into account specific needs related to gender and covers aspects of the RSPO principles and criteria in a form that they can understand and includes an assessment of the training has been implemented.			
Root Cause Analysis (filled by organization audited): The company has not yet identified training needs aimed at plasma farmers, outgrowers and contractors. Thus, there are no programs available in this regard.			

Correction <i>(filled by organization audited):</i>	
<ul style="list-style-type: none"> • Identify training needs and include them in the 2021 training program. • Conduct training related to RSPO principles and criteria to plasma smallholders, outgrowers and contractors. 	
Corrective Action <i>(filled by organization audited):</i>	
Ensure that the training / socialization programs that have been prepared for plasma farmers, contractors and outgrowers are carried out regularly and periodically every year.	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>	
Verify January 24, 2021	
The unit of certification shows evidence of improvement, including the following:	
<ul style="list-style-type: none"> • Letter from the Senior Manager of Community Development to the Management of the Panca Mitra Abadi Cooperative and five Farmer Representatives No. 012.MCD-SISM/XI/2020 dated 8 November 2020 regarding the socialization of the RSPO principles, as well as the financial status report for the period July to d. September 2020. • Letter of Senior Manager Community Development to the Management of the Harapan Jaya Palm Oil Cooperative, Trimulia Lestari Palm Oil Cooperative and five Farmer Representatives No. 012.MCD-SISM/11/2020 dated 20 November 2020 regarding the socialization of the RSPO principles, as well as the financial status report for the period January to d. September 2020. • Socialization of the RSPO and forest and land fires on 20 November 2020, which was attended by 17 representatives of PT Sawit Mitra Abadi. • RSPO socialization, forest and land fires, cooperative finance on 24 November 2020, which was attended by 20 representatives of cooperatives. • The 2021 Environmental Health and Safety training program approved by the GM PT SISM on 17 December 2020. The next training for plasma farmers will be held in the second week of April and the first week of November 2021. 	
Based on the description of the root cause, corrective action, and evidence of improvement shown, Non-conformance No. 2020.04 is declared to have been fulfilled.	
Verified by	: Rindu Galih Rezza Rachmansyah and Mohamad Amarullah

NCR No.	: 2020.05	Issued by	: Rindu Galih Rezza Rachmansyah
Date Issued	: 06 November 2020	Time Limit	: Surveillance-3
NC Grade	: Minor	Date of Closing	: 24 August 2021
Standard Ref. & Requirement	: 6.2.6 Non-critical A decent living wage (DLW) is given to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis whose wages are calculated based on the quota that can be achieved during regular working hours.		
Evidence observed <i>(filled by auditor):</i>			
-			
Non-Conformance Description <i>(filled by auditor):</i>			

<p>The certification unit has not been able to show the Decent Living Wage (DLW) assessment document obtained by workers along with the calculation of prevailing wage and in-kind benefits in accordance with the provisions stipulated in the Guidelines for Calculating a Decent Living Wage (DLW) issued by the RSPO in June 2019.</p>	
<p>Root Cause Analysis <i>(filled by organization audited):</i> There is no PIC for calculation of DLW</p>	
<p>Correction <i>(filled by organization audited):</i> Conduct DLW calculation that have been provided by company to worker</p>	
<p>Corrective Action <i>(filled by organization audited):</i> Ensure the DLW calculation is available in unit and the facility is always provide for workers</p>	
<p>Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Verification on 24 August 2021 The company shows the calculation of in-kind benefits and prevailing wage. The calculated in-kind benefits consist of housing that includes clean water and electricity, education, and health facilities. The company has also calculated the average wage of workers for each operation unit. In addition, the company also shows documents for employee salary slips, for example a boiler operator with NIK 10009109 gets a basic salary of IDR 2,907,073, where the basic wage received by employees is greater than the UMSK Ketapang in 2021, which is IDR 2,888,000. Based on this explanation, the discrepancy has been met.</p>	
Verified by	: Asystasya Aishah Silalahi

NCR No.	: 2020.06	Issued by	: Rindu Galih Rezza Rachmansyah
Date Issued	: 06 November 2020	Time Limit	: Surveillance-3
NC Grade	: Minor	Date of Closing	: 24 August 2021
Standard Ref. & Requirement	: 6.2.7 Non-critical Permanent workers are employed for all major work performed by the unit of certification. Temporary workers and casual daily workers are limited to work of a temporary or seasonal nature.		
<p>Evidence observed <i>(filled by auditor):</i></p> <ul style="list-style-type: none"> • The results of reviewing the 2020 Budget document for the harvesting needs of PT Sepanjang Inti Surya Mulia are 617 people and PT Sawit Mitra Abadi is 368 people. • The results of the study of the worker list document in October 2020 found that there were 6 daily contract workers (BHL) harvesters and 510 permanent workers for PT Sepanjang Inti Surya Mulia, while for PT Sawit Mitra Abadi there were 169 daily contract workers (BHL) and 176 permanent workers. • In Law no. 13 of 2003 it is known that casual daily laborers can only be employed in jobs that are not permanent or seasonal in nature. Harvesting work is a permanent job (work that is continuous in nature, not intermittent, not limited by time and is part of a production process in a company or work that is not seasonal). • In GAPKI Circular Letter No. 073 / GAPKI / II / 2013 states that harvesting work is the main type of work. <p>Non-Conformance Description <i>(filled by auditor):</i> The unit of certification has not been able to prove that casual daily workers are limited to work that is temporary or seasonal in nature.</p>			
<p>Root Cause Analysis <i>(filled by organization audited):</i></p>			

The understanding so far regarding the process of hiring field employees, especially harvesters, is starting from the daily worker stage (Free Daily Workers) as an evaluation stage towards the appointment process as Permanent Daily Employees. During this daily worker period, they will be evaluated regarding their attendance and productivity whether they are eligible to be appointed or not to become Permanent Daily Employees.

So that in SISM and SMA there were harvesters who are still casual worker status.

Correction *(filled by organization audited):*

A gradual evaluation will be carried out on Harvest employees who are still casual worker status to be appointed as Permanent Daily Employees. So that it reaches a normal condition where all harvesters have permanent worker status. Because harvesting is a permanent job and the main job in the oil palm plantation industry.

Corrective Action *(filled by organization audited):*

Circulars letter were made again to each OU (operation unit) regarding the process of recruiting new Harvest employees using the *PKWTT* (permanent worker) employee status pattern with a trial period of 3 months. This 3 month period is an evaluation period regarding their eligibility to pass or not as employees.

For old employees who are still casual status, a gradual evaluation and appointment will be carried out to become KHT

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

Verification on 24 August 2021

The company provides evidence of improvements in the form of:

- An example of the appointment of casual worker to become permanent worker based on the minutes of appointment of casual worker to become permanent worker No. 001/SisM/M56/04/2021 dated April 1, 2021. There are 2 employees who have been appointed as permanent worker.
- The PT SIsM employee list document for the July 2021 period shows that all employees have permanent worker status.
- Internal memo No. 054/HR-SISM/XI/2020 regarding the permanent worker Agreement issued on November 19, 2020 which explains that every new employee with permanent worker status will be made a work agreement of *PKWTT* with a trial period of 3 months.

Based on interviews with representatives of PT SMA, it is known that newly recruited workers will have a work agreement of *PKWTT* with a probationary period of 3 months.

Based on the evidence of improvement shown, non-conformities have been met and will be observed during the onsite audit

Verified by : **Asystasya Aishah Silalahi**

NCR No.	: 2020.07	Issued by	: Rindu Galih Rezza Rachmansyah
Date Issued	: 06 November 2020	Time Limit	: 04 February 2021
NC Grade	: Major	Date of Closing	: 24 January 2021
Standard Ref. & Requirement	: 6.7.3 Critical Workers use appropriate Personal Protective Equipment (PPE), and it is provided free of charge to all workers in the workplace, as protection in all operations that have potential hazards, such as pesticide application, machine operation, land preparation, and harvesting. Sanitation facilities are available for workers who use pesticides so that workers can remove PPE, clean themselves and put on their personal clothes.		

Evidence observed (filled by auditor):

Personal Protective Equipment (PPE) – Mulia Oil Mill

- One (1) sorting worker whose safety shoes are in damaged condition and four (4) other sorting workers use boots instead of safety shoes.
- One (1) operator of the loading ramp in a condition where the safety shoes are damaged, so they use boots.
- One (1) press operator uses boots instead of safety shoes and does not use earplugs.
- One (1) kernel operator wears boots instead of safety boots.
- Two (2) boiler operators use earplugs instead of earmuffs.
- One (1) welder who is working but not wearing leather gloves and face shield.

Unsafety Condition

- Three (3) FFB truck drivers do not use PPE when entering and working in the sorting/loading ramp area.
- One (1) FFB truck driver smokes while in the sorting/loading ramp area.
- There is no visitor path in the factory operational area.
- There is a build-up of kernal and fiber around the engine room and kernel stations making these areas difficult to pass.
- There is a rotating wheel on the pumping machine in an unprotected WWTP area.

Non-Conformance Description (filled by auditor):

The certification unit has not been able to prove that all workers have used PPE in accordance with the SOP for Personal Protective Equipment (PPE) and HIRAC documents that are owned along with the application of appropriate K3 in all operational areas.

Root Cause Analysis (filled by organization audited):

Personal Protective Equipment (PPE)

- All PPE for employees has been distributed, but the durability period of PPE is different at each station and the procurement of PPE is already in the process of ordering from the vendor, therefore workers have not been given PPE replacement.
- Monitoring of the use of PPE by employees and the feasibility of the condition of PPE has not been implemented optimally.

Unsafety Condition

- FFB truck drivers lacked socialization regarding the mandatory use of PPE and smoking bans in the Mill area.
- Kernel and fiber piles have not been moved to the warehouse.
- The old visitor path has faded and has never been maintained.
- Safety cover for the WWTP pump engine which was previously damaged and is in the process of being replaced.

Correction (filled by organization audited):

Personal Protective Equipment (PPE)

Distribution of PPE to employees according to their needs based on the conditions of their respective work stations.

Unsafety Condition

- Conduct socialization on the use of PPE and smoking bans in the factory area.
- Repainting visitor paths for all factory areas.
- Transfer of kernal and fiber piles from engine room and kernel stations.
- Installation of the pump engine safety cover in the WWTP.

Corrective Action (filled by organization audited):

Carry out regular inspections of the workplace to ensure the use of PPE and identify hazardous conditions and incorporate it into the work program on a regular basis and periodically.

Assessor Evaluation and Conclusion (filled by auditor):

Verify January 24, 2020

The unit of certification shows some evidence of improvement, including the following:

- Documentation of the submission of PPE to Sorting Workers, Loading Ramp Station Operators, Press Station Operators and Kernel Station Operators on 19 November 2020.
- Documentation of PPE welders according to HIRAC.

Unsafety condition

- Kernel and fiber cleaning documentation around Engine Room Stations.
- Documentation of making a visitor line in the mill operational area (green paint).
- Documentation of cover installation on rotating pump engine parts in the WWTP area.
- Internal Office Memo Mill Manager to all leaders on November 25, 2020 to carry out socialization to Drivers Transporting FFB, Empty bunch, Kernel and CPO so that they are required to use appropriate PPE, and are not allowed to smoke in the factory operational area. For those who do not comply, the perpetrator and the vehicle number will be recorded, then reported to the relevant leadership.
- Documentation of checking the completeness of PPE Driver.
- Installation of Warning Signs or OHS Directions in front of the Weighbridge Station.

Based on the description of the root cause, corrective action, and evidence of improvement shown, Non-conformance No. 2020.07 is declared to **have been fulfilled**.

Verified by : Rindu Galih Rezza Rachmansyah and Mohamad Amarullah

NCR No.	: 2020.08	Issued by	: Rindu Galih Rezza Rachmansyah
Date Issued	: 06 November 2020	Time Limit	: Surveillance-3
NC Grade	: Minor	Date of Closing	: 24 August 2021
Standard Ref. & Requirement	: 6.7.4 Non-critical All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.		

Evidence observed (filled by auditor):

- The certification unit has registered 1,662 plantation workers (Mulia 1-6 Estate) in the *BPJS Ketenagakerjaan* program and for the September 2020 period, evidence of contributions has been paid on October 21, 2020. The results of a document review of the workers list found that the number of workers in that month was as much as 1,702 people (difference of 40 people).
- The results of a study on the list of workers in September 2020 found that the number of workers for Mulia Oil Mill was 124, but this has not been shown in relation to evidence that these workers have been registered in the *BPJS Ketenagakerjaan* program.

Non-Conformance Description (filled by auditor):

The certification unit has not been able to prove that all workers have been registered in the BPJS Employment program.

Root Cause Analysis (filled by organization audited):

Disorganized Admin of each OU in reporting non-active employees at the end of the current month, so that there are employees who have been inactive within one month of the payroll period but in the employee data program they are

still listed as active. Data that goes to the HR Admin as the PIC who can access to perform non-active employees always passes from the end of the month due to waiting for the closing process and salary recap to finish.

The HR admin performs the *BPJS* employment payment process, which is basically a salary recap, so employees who are not listed in the salary recap (no activity in one month) are not paid the *BPJS* employment contribution. If the employee is not active in one payroll period and is not deactivated at the end of the month. Then the employee still appears in the employee database, while the salary recap is no longer available so he does not pay his *BPJS* contributions. This is what always causes discrepancies between *BPJS* Employment payment data and employee data.

For the case at Mulia Oil Mill, this happened because the request for supporting data related to this was on the last day of closing, so the MOM admin did not have time to provide proof of payment for *BPJS* Employment to the Audit

Correction (filled by organization audited):

HR Manager Confirms to each OU to be able to report employees who have no activity during the payroll period to the HR admin for the non-active employee process.

For 4 Executives who are listed as Non-staff, they will be corrected in GP with Staff status.

Corrective Action (filled by organization audited):

HR Manager again made an IOM confirmation as well as revising the previous IOM (dated November 06, 2020) related to maintaining outgoing employee data in the GP System.

IOM confirmation has been issued on December 01, 2020 with the title Maintain employee data out in the GP System – Revision 1

Assessor Evaluation and Conclusion (filled by auditor):

Verification on 24 August 2021

The company has shown proof of payment of *BPJS* Employment for PT SISM plantations and mill for the July 2021 period with the following details.

- Proof of *BPJS* Employment payment for the period July 2021 on August 13, 2021 for 103 MOM employees
- Proof of payment of *BPJS* Employment for the period of July 2021 on August 16, 2021 for 1754 employees of PT SISM (Estate)

Based on a review of the PT SISM employee list document for the July 2021 period, it is known that there are 103 mill employees and 1,754 estate employees.

The company also shows internal memo No. 080/HR-SISM/XII/2020 dated December 1, 2020 regarding Maintain employee data out in the GP System – Revision 1. The memo confirms to head of administration in each operation unit that to report all employees who are inactive or no activity in one payroll period to be reported to the HR admin at the end of the month so that the HR admin can take action.

In this regard, the discrepancy has been met and will be re-observed in the next assessment.

Verified by : **Asystasya Aishah Silalahi**

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-3 Assessment (Remote Audit)

NCR No.	: 2021.01	Issued by	: Ardiansyah
Date Issued	: 24 August 2021	Time Limit	: ASA - 4
NC Grade	: Minor	Date of Closing	: 1 November 2021
Standard Ref. & Requirement	3.2.2 Using the RSPO metrics template, annual reports are submitted to the RSPO Secretariat for continuous monitoring and improvement.		
Evidence observed (filled by auditor): The company shows the RSPO V.2.1 metric template which informs about member details, area use, mill production, estate production, employment social data, complaints, training, accidents, and others.			
Non-Conformance Description (filled by auditor): The RSPO metric template does not contain accurate information in accordance with actual conditions, for example data on total certified area, production of smallholder schemes, mill name, mill capacity.			
Root Cause Analysis (filled by organization audited): At the time of the audit, the data for the Mill and Estate template metrics had not been updated.			
Correction (filled by organization audited): Completing all Mill and Estate data according to the Metrics Template containing accurate information according to actual conditions.			
Corrective Action (filled by organization audited): Sustainability Data Controller Ensure Metrics Template contains accurate information according to actual conditions before the audit takes place.			
Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification October 19, 2021 The company shows evidence of the RSPO Metrics Template document updated 09 October 2021. The results of the study of the document, it is known: <ul style="list-style-type: none"> • The Palmtrace Metrics ID of the RSPO Template is different from the Palmtrace ID of the RSPO Palm Trace Web • Certified and noncertified PO data for the period July 2020 – June 2021 does not match the data in the basic info. In addition, there are data differences between basic info and mass balance. • Certified and non-certified PK data for the period July 2020 – June 2021 do not match the data in the basic info. In addition, there are data differences between basic info and mass balance. 			
Auditor Verification November 1, 2021 The company has shown evidence of the RSPO Metric Template document, updated October 29, 2021, and the inputted data is in accordance with actual conditions. Based on this explanation, the discrepancy is declared Closed .			
Verified by	: Ardiansyah		

NCR No.	: 2021.03	Issued by	: Ardiansyah
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Date Issued	: 24 August 2021	Time Limit	: ASA – 4
NC Grade	: Minor	Date of Closing	: 19 October 2021
Standard Ref. & Requirement	<p>7.2.5 No use of pesticides listed on the World Health Organization (WHO) Class 1A or 1B or under the Stockholm or Rotterdam Conventions, as well as paraquat, except in exceptional circumstances validated by a due diligence process or where permitted by the relevant government authority. authorized to deal with pest outbreaks. The due diligence refers to:</p> <ul style="list-style-type: none"> • Assessment of the threat, and verification of the reasons for the perceived threat as a major threat. • Reasons for not having other alternatives that can be used. The process carried out to verify the reasons for the absence of a less harmful alternative. • Processes to limit the negative impacts of the application. • Estimated time span of the application, along with the steps taken to limit it to address specific outbreaks. 		
<p>Evidence observed (filled by auditor): The company shows documents:</p> <ul style="list-style-type: none"> • Records of the use of paraquat in 2020 for PT SiSM 12,326 L and PT SMA 397 L. • Internal Office Memo dated February 1, 2018 regarding Minimizing the use of paraquat pesticides, which explained the plan to use 4784 L of paraquat in 2020. 			
<p>Non-Conformance Description (filled by auditor): Based on the explanation above, it is known that the implementation of paraquat reduction is not in accordance with the published IOM.</p>			
<p>Root Cause Analysis (filled by organization audited): No one has yet been responsible for monitoring the use of paraquat.</p>			
<p>Correction (filled by organization audited): Stop using paraquat.</p>			
<p>Corrective Action (filled by organization audited): The head of the operating unit is responsible for ensuring that paraquat is not used again.</p>			
<p>Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification October 19, 2021, The company shows evidence:</p> <ul style="list-style-type: none"> • Internal Office Memo Group Manager number 001/R0/IX/2021 dated 15 September 2021 regarding the cessation of the use of paraquat pesticides. • Evidence of IOM's implementation of IOM termination of paraquat email communication to related parties. <p>Based on the evidence, the non-conformance is declared Closed.</p>			
Verified by	: Ardiansyah		

3.4.3. Identification of Findings, Corrective Actions and Observations at ASA-3 and ASA -4 (Onsite) Assessment

NCR No.	: 2022.01	Issued by	: Radytio Puspanjana
Date Issued	: 28 July 2022	Time Limit	: Next Assessment
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	3.4.2 For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.		
<p>Evidence observed (filled by auditor):</p> <p>As a form of social management, the company has developed/compiled by involving independent parties in conducting social impact assessments related to the company's operational activities. The first social impact assessment was conducted in March 2009 by internal (PT SMA) and on December 2010 for PT. SISM, as a follow-up to the results of the assessment, there are several recommendations/matrixes for the management plan and monitoring of social impacts.</p> <p>As one of the efforts to improve and pay attention to the latest situation in 2009 and 2010 the company carried out the Social Impact Review and Update which was carried out in November 2021, where this was due to the dynamic social situation and the seriousness of the company to build and maintain the company's sustainability.</p> <p>The SIA review was carried out by involving the surrounding community, field data collection activities were carried out on 6-11 September 2021 by involving affected stakeholders, both internally and externally through in-depth interviews, focus group discussions (FGD) and field observations. The stakeholders involved in the preparation of the SIA study were 12 stakeholders with details of PT SMA Management, PT SMA employees, Ketapang Regency Government, Plantation Service, Cooperatives Service, Head of Sub-district, Village Heads and Village Government, elder leaders & religious leaders, community leaders, oil palm farmers & rubber, land-owning communities and surrounding communities. Based on the results of the review, there are several issues in the company's operational areas which are categorized into 4 (four) categories, namely Critical, high, medium, and low. These issues include:</p> <ul style="list-style-type: none"> - Poor village road access - The company does not want to buy oil palm farmers - Plasma yield - Village cash land has not been realized - Shifted conservation area - Land certification - CSR program transparency - Bringing in workers from outside the region - Environmental monitoring sampling that is not in accordance with SOP - Company concern - Declining environmental quality - Employment status <p>As a follow-up to the SIA review, the company has developed a plan and monitoring of social impacts for the 2022 period, but the auditor team assesses that the management and monitoring plan is only limited to a CSR program and has not referred to the issues identified according to the results of the last review in 2021.</p> <p>Non-Conformance Description (filled by auditor):</p> <p>The social impact management and monitoring plan of PT SIA and PT SISM has not been planned and developed in accordance with the results of the last SIA review (November 2021) and there is no time management in the planning and monitoring of the SIA.</p>			

Root Cause Analysis (filled by organization audited):	
Correction (filled by organization audited):	
Corrective Action (filled by organization audited):	
Assessor Evaluation and Conclusion (filled by auditor):	
Verified by	:

NCR No.	: 2022.02	Issued by	: Yudhi Yuniarto Tallutondok
Date Issued	: 28 July 2022	Time Limit	: 27 October 2022
NC Grade	: Major	Date of Closing	: 11 October 2022
Standard Ref. & Requirement	: 3.6.2 The effectiveness of the H&S plan to address health and safety risks to people is monitored		

Evidence observed (filled by auditor):

As part of its efforts to address OSH for employees, the certification unit has:

4. The HIRADC document was last updated January 2022. The document has detailed the potential hazards and precautions to be taken
5. SOP for Personal Protective Equipment (PPE) with No. SOP/SISM/SHE10 dated February 01, 2020. In the Distribution section (new distribution and replacement) of PPE it is explained that if the PPE is damaged before its life time, employees can exchange it with new PPE by bringing the damaged PPE
6. OHS inspection and monitoring carried out every month

However, based on the field observation and interviews, there are several managements that are considered ineffective, for example:

5. Inconsistent and uninformative marking of symbols and warnings in chemical warehouses and toxic and hazardous waste in estate and mill (size, potential hazards that have arisen and have begun to fade)
6. Availability/effectiveness of facilities and infrastructure in the event of an emergency such as sirens, eye washes, access to safe points, location of first aid kits either in estates or mills
7. Monitoring the use of PPE that has not been carried out thoroughly so that employees are found using damaged PPE or buying their own, for example:
 - f. The operator of the Kebun Mulia 3 generator uses PPE types of shoes that have been damaged.
 - g. The Mulia Oil Mill loader operator uses PPE type shoes that have been damaged.
 - h. The Mulia Oil Mill boiler operator uses PPE type shoes that have been damaged.
 - i. The WTP Mulia Oil Mill operator uses PPE type shoes that have been damaged.
 - j. The employees of the Trimulaya Lestari Palm Oil Cooperative harvest use PPE type shoes by buying their own.
8. There are several unsafe work practices, for example, FFB loading employees are found sitting next to the tractor driver, tractor trailer, in front of the trailer or in the bucket bechoe loader.

Non-Conformance Description (filled by auditor):

In this regard, the auditor considers that the OHS management plan carried out has not been effective and comprehensive in all operating units.

Root Cause Analysis (filled by organization audited):

1. Lack of monitoring symbols or warnings that have been damaged or faded and sizes are not standard.
2. Lack of monitoring, data collection and maintenance of emergency response facilities and infrastructure.
3. Delay in the purchase process and the arrival of PPE Employees.

4. Weak monitoring and awareness of employees regarding unsafe work practices that can pose a risk of work hazard.

Correction (filled by organization audited):

1. Data collection and monitoring Symbols or warnings that have been damaged and have non-standard sizes.
2. Monitoring, data collection and maintenance of emergency response facilities and infrastructure.
3. Follow-up requests for employee PPE purchases and monitoring the provision of PPE to employees.
4. Issuance of IOM 003/RO/I/2022 related to employee pick-up and socialization to employees regarding unsafe work practices.
5. The SHE Officer is responsible for collecting data and monitoring symbols or warnings that have been damaged and have non-standard sizes
6. The SHE Officer is responsible for monitoring, collecting data and maintaining the condition of emergency response facilities and infrastructure.
7. The Operations Unit Leader is responsible for Follow-up requests for employee PPE purchases as well as monitoring the provision of PPE to employees.
8. The Head of the Operations Unit is responsible for employee pick-up and socialization to employees regarding unsafe work practices.

Corrective Action (filled by organization audited):

1. The head of the Operations unit is responsible for following up on the results of data collection and monitoring of symbols or warnings that have been damaged and have non-standard sizes.
2. The head of the Operations unit is responsible for following up on the results of monitoring, data collection and maintenance of the condition of emergency response facilities and infrastructure.
3. The Head of the Operations Unit is responsible for ensuring that PPE for employees is met in accordance with SOP SHE-010 regarding Personal Protective Equipment.
4. The Head of the Operations Unit is responsible for ensuring safe work practices in the area.

Assessor Evaluation and Conclusion (filled by auditor):

Verifikasi Auditor 11 Oktober 2022,

The certification unit shows evidence of improvement as follows:

1. Documentation of replacement of OHS, toxic and hazardous materials, toxic and hazardous waste symbols in all warehousing areas in factories and plantations (Mulia 1-Mulia 6).
2. Purchase orders for sign boards for warehousing areas, WWTP pools, and diesel tanks to CV SBAL-Fazza on September 16, 2022.
3. Documentation of checking and repairing emergency response facilities and infrastructure in mill and estate (Mulia 1-Mulia 6).
4. Inspection Form for warehousing area and schedule waste storage in each unit. The inspection was carried out in early September 2022 with the results that all OHS and Environmental aspects in each warehousing area have been fulfilled.
5. Minutes of socialization of the use and replacement of PPE, shuttles for employees at work, prohibition of burning waste and prohibition of reusing toxic and hazardous waste packaging to all employees in each unit on August 9 – September 2, 2022. The certification unit can show documentation and attendance lists for the socialization.
6. Minutes of handover for replacement of damaged PPE for each unit carried out from 16-24 August 2022.
7. Inter Office Memo from Group Manager with No. 003/RO/I/2022 dated August 3, 2022. The IOM explained that it is recommended that employees pick up and drop off using a dump truck, motorbike or LV car.
8. Minutes of sticking stickers are prohibited from riding on each farm tractor on September 22, 2022.
9. Minutes of socialization of the prohibition of riding on farm tractors in each estate which will be held simultaneously on August 9, 2022. The company can show documentation and attendance lists for the socialization.

Based on the above, the non-conformance is declared to have been fulfilled and will be re-verified at the next field visit.

Verified by : **Yudhi Yuniarto T**

NCR No.	: 2022.03	Issued by	: Yudhi Yuniarto Tallutondok
Date Issued	: 28 July 2022	Time Limit	: 27 October 2022
NC Grade	: Major	Date of Closing	: 11 October 2022
Standard Ref. & Requirement	6.2.1 Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand		
<p>Evidence observed (filled by auditor): The certification unit shows the Internal Office Memo from Assistant Vice President Palmindo with No. 001/IOM/AVP-PAL/XI/2017 dated November 30, 2017 concerning provisions for wages for Harvest Checkers on sundays/ holidays. In the IOM it is explained that the wages given to harvest checker workers who work on Sundays/holidays:</p> <ol style="list-style-type: none"> 3. 2 times the basic salary/ working day. 4. Employment premium with GPN premium rate per working day (set at IDR 35,000) <p>However, the IOM has not regulated how the mechanism of wages for harvester who work on sundays/ weekly rest days as regulated in PP 36 of 2021 article 39 states that employees who work on holidays are required to get overtime pay. This is proven based on</p> <ol style="list-style-type: none"> 3. Based on the harvester (NIK 10014524) wage verification of payment documents for the period of June 2022 who work on sundays, it is known that the payment system is the same as payments on normal working days (system of yield units). 4. Based on the interviews with Mulia 3 harvester revealed that the payment of wages if working on sundays is the same as the usual day (product unit system). <p>Based on the explanation above, it is known that the certification unit has not shown the wage requirements in accordance with the applicable labor regulations.</p>			
<p>Non-Conformance Description (filled by auditor):</p> <p>The certification unit has not shown sufficient evidence that the mechanism that regulates the procedure for wages while working on holidays is for all levels of employees.</p>			
<p>Root Cause Analysis (filled by organization audited): The certification unit has not regulated wages based on <i>PP No. 36</i> Article 39 regarding wages on weekdays or holidays.</p>			
<p>Correction (filled by organization audited): Make a policy regarding the prohibition of working on Sundays/holidays</p>			
<p>Corrective Action (filled by organization audited): The Head of the Operations Unit is responsible for ensuring the implementation of IOM No.13/HR/Palmindo/IX/2022 Regarding work on Sundays or holidays, the absence of work.</p>			
<p>Assessor Evaluation and Conclusion (filled by auditor):</p> <p>Verifikasi Auditor 11 Oktober 2022, The certification unit shows evidence of improvement as follows:</p> <ol style="list-style-type: none"> a. Internal Memo from HR Palmindo to all management units with No. 13/HR/Palmindo/IX/2022 dated 26 September 2022 regarding working on Sundays or holidays. In the policy it is written that all work on Sundays and or national holidays is abolished because the certification unit's policy has not accommodated the provisions in PP no. 36 Year 2021. 			

b. Socialization to all employees regarding the Internal Memo from HR Palmindo about working on Sundays or holidays. The socialization will be carried out in stages starting from 27-29 September 2022. The certification unit can show documentation and attendance list for the socialization.

Based on the foregoing, the non-conformance is declared to have been met and will be re-verified at the next field visit.

Verified by : **Yudhi Yuniarto Tallutondok**

NCR No.	: 2022.04	Issued by	: Radytio Puspanjana
Date Issued	: 28 July 2022	Time Limit	: Next Assessment
NC Grade	: Minor	Date of Closing	:
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):			
<p>The waste management and disposal plan has been included in the procedures that are owned according to the type / category of each waste, for example:</p> <p>4. Domestic Solid Waste The SOP for domestic waste management is described in the Procedure for Waste Management in Work Areas and Housing No. SOP ENV557 dated August 1, 2013 explaining that the domestic waste generated is transported periodically (according to the schedule) to the landfill (<i>TPA</i>). The transportation officer makes a record on the domestic waste report form.</p> <p>5. Hazardous Waste The SOP for the Management of Hazardous and Toxic Waste Management Procedures No. SOP ENV551 dated August 1, 2013 explains that the waste of 3 hazardous chemicals (including pesticides) is placed in a hazardous waste storage, then handed over to licensed transporters and beneficiaries.</p> <p>6. Waste from fertilizer sacks The Waste used for fertilizer sacks is regulated in SOP OPM 07 Fertilization of Palm Oil Plants (Manuring) which explains that sacks of fertilizer are collected in the fertilizer warehouse. However, the SOP does not clearly regulate and further what if the waste from the fertilizer sack (including the inner, inner plastic wrap) is damaged and is no longer used.</p> <p>So based on the results of field visits, there are still sacks of discarded fertilizers in various locations, for example:</p> <p>Based on the results of the field visit, it is known that the procedure has not been fully implemented, for example;</p> <ul style="list-style-type: none"> - In Abadi housing 1 and 2, it is known that there is a domestic waste disposal activity in the back ditch of the housing. - In Mulia 3 housing, it is known that there are traces of domestic waste burning activities and domestic waste disposal in front of the housing (in the sil pit). - It was found that several types of hazardous waste were not placed in unlicensed locations, for example: <ul style="list-style-type: none"> • Used oil drums are used as trash bins at the Mulia Oil Mill Engine Room Station. • Used oil drums are placed next to Mulia Oil Mill's general warehouse • Used oil drums at Mulia Oil Warehouse • Pesticide packaging and used oil drums are used as a drinking water reservoir in the barracks for employees of a warehouse building contractor in Mulia 3 housing complex. - It was found that used fertilizer sacks were not managed according to procedures, for example: <ul style="list-style-type: none"> • Dumped in front of Mulia 3 estate housing complex (in sil pit). • Dispose of at the final waste disposal site for the Sawit Mitra Abadi 1-2 Estate housing block H17. 			

<ul style="list-style-type: none"> Dispose of in the final garbage disposal site for Mulia 3 housing complex. 	
Non-Conformance Description (filled by auditor): The company has not been able to show evidence that the evidence of waste disposal is in accordance with the procedures it has.	
Root Cause Analysis (filled by organization audited):	
Correction (filled by organization audited):	
Corrective Action (filled by organization audited):	
Assessor Evaluation and Conclusion (filled by auditor):	
Verified by :	

NCR No. :	2022.05	Issued by :	Radytio Puspanjana
Date Issued :	28 July 2022	Time Limit :	27 October 2022
NC Grade :	Major	Date of Closing :	27 October 2022
Standard Ref. & Requirement :	7.8.2 Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) and Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).		
Evidence observed (filled by auditor): The company has procedures for protecting riparian zones and buffer zones which are described in several documents, namely: <ul style="list-style-type: none"> - The 2022 HCV plan management document is known to PT SMA and PT SISM explaining the HCV area management and monitoring plan. The 2022 HCV management plan explains several programs, namely: <ul style="list-style-type: none"> • Installation of HCV signboards and inventory at the end of each year. • Monthly HCV limit marking • Outreach to employees and the community • HCV monitoring • And evaluation, every year. - Implementation document of HCV management and monitoring implementation report in 2022, all programs have been realized. - SOP for Determination and Management of riparian no. SOP/GPN/14 was issued November 1, 2016 which explains the determination of the width of riparian according to Presidential Decree 32 of 1990 for large rivers with border widths (right & left) and small rivers with a river width of 50 meters (right & left). The marking of river boundaries is by installing stakes whose ends are marked with paint colors with a stake of 100 cm high or by painting on trees. 			

- The PT SMA HCV report compiled in November 2014 explained that the HCV areas identified in PT SMA Plasma 1 for attribute 4.1 are Belian Bedarah River, Danau Pasir River, Majo River, Miao River, Kenahare River, Plakenan River and Benipis River. Based on this document, recommendations for riparian management are recommended, namely the prohibition of the application of chemicals on riparian.
- Internal office memo no: 001/RO/IX/2021 dated September 15, 2021, at point 8 explains that riparian are not allowed to apply chemicals including pesticides with a distance of 50-100 from the riparian.

However, based on the results of field visits in the HCV area, it was found that at the Danau Pasir riparian there was evidence that pesticide spraying activities had been carried out on the Danau Pasir riparian, where the results of the verification of the document for the Foreman Activity Book / Abadi Estate Supervision 1 plasma division dated 7 June 2022, explained that it had Chemical application activities (CPT) were carried out in block I08.

Non-Conformance Description (filled by auditor):

The company has not been able to show evidence that the implementation of the riparian zone and buffer zone protection plan has been in accordance with the predetermined plan.

Root Cause Analysis (filled by organization audited):

1. Lack of socialization and understanding to supervision and employees in the management of riparian zones and buffer zones.
2. Lack of signs of information in the field regarding the boundaries of riparian zones and buffer zones related to chemical application.

Correction (filled by organization audited):

1. Socialization to supervisors and employees regarding the management of riparian zones and buffer zones
2. Provision of information signs in the form of signboards and location boundaries of the riparian zone and buffer zone.

Corrective Action (filled by organization audited):

1. Head of Operating Unit Ensure that the management of river border areas and buffer zones is carried out.
2. The Head of the Operating Unit ensures that information signs on the prohibition of chemical application in riparian zones and buffer zones are maintained.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor verification on October 4, 2022.

The company shows proof of improvement in the form of:

- Absence of socialization on the prohibition of chemical use activities at PT SISM's HCV and river boundaries in Mulia 1&2 block 04 1 dated 16 September 2022, block 04.2 Mulia 3&4 and block OU 3 Mulia 5&6.
- Minutes of painting on the HCV boundary area or Mentiakau riparian at OU 3 on 10 September 2022, Plabian river OU3 9 September 2022, Senggilingan riparian on 21 September 2022, Tapal riparian on 17 September 2022, Tayap riparian on 20 September 2022 and Udan river riparian on September 19, 2022. The marking is done by painting red color on the oil palm trees.
- Minutes of socialization of chemical activities at the HCV boundary and the Mulia 1&2 riparian on 16 September 2022 to pesticide applicators.
- Minutes of socialization of chemical activities at the HCV boundary and the Mulia 3&4 riparian on 15 September 2022 to pesticide applicators.
- Minutes of socialization of chemical activities at the HCV boundary and the Mulia 5&6 riparian on 15 September 2022 to pesticide applicators.

Auditor verification on October 27, 2022.

The company shows proof of improvement in the form of:

- Minutes of Installation of Boundary pole and Sign Board for the Sungai Mulia 1-2 Boundary on September 17, 2022; Sungai Mulia 3-4 on September 20, 2022; Sungai Mulia 5-6 on 19 and 21 September 2022; and at PT SMA in August 2022.
- Recapitulation of the principal amount in the marked riparian along with the distance of the riparian.

- Guidelines that regulate the technique of painting oil palm trees on HCV boundaries and riparian refer to SOP/GPN/S/03 Regarding Management and monitoring of high conservation value areas (attached) and IOM IOM 001/RO/IX/2021 dated 15 September 2021, point 8 explains that the river border is not allowed to apply chemicals including pesticides with a distance of 50-100 from the river.
- Documentation of installation of signboards and riparian.
- Materials for socialization of HCV and riparian and Evaluation of chemical activity socialization activities on HCV and riparian as stated in the inspection related to pesticide spray activity (attached).

Based on the above, the non-conformance is declared to have been fulfilled and will be re-verified at the next assessment.

Verified by : **Radytio Puspanjana**

NCR No.	: 2022.06	Issued by	: Radytio Puspanjana
Date Issued	: 28 July 2022	Time Limit	: 27 October 2022
NC Grade	: Major	Date of Closing	: 27 October 2022
Standard Ref. & Requirement	<p>7.12.4 HCV and HCS forests after November 15, 2018, peatland and other conservation areas that have been identified, protected and/or enhanced. Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if needed, and are complemented by monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and covers the area that is directly managed and considers the broader level of the relevant landscape (if the landscape has been identified).</p>		
<p>Evidence observed (filled by auditor): The HCV management plan is contained in the document:</p> <ul style="list-style-type: none"> - The 2022 HCV plan management document is known to PT SMA and PT SISM explaining the HCV area management and monitoring plan. The 2022 HCV management plan explains several programs, namely: <ul style="list-style-type: none"> • Installation of HCV signboards and inventory at the end of each year. • Monthly HCV limit marking • Outreach to employees and the community • HCV monitoring • And evaluation, every year. - SOP for Determination and Management of riparian no. SOP/GPN/14 was issued November 1, 2016 which explains the determination of the width of riparian according to Presidential Decree 32 of 1990 for large rivers with border widths (right & left) and small rivers with a river width of 50 meters (right & left). The marking of river boundaries is by installing stakes whose ends are marked with paint colors with a stake of 100 cm high or by painting on trees. - The PT SMA HCV report compiled in November 2014 explained that the HCV areas identified in PT SMA Plasma 1 for attribute 4.1 are Belian Bedarah River, Danau Pasir River, Majo River, Miao River, Kenahare River, Plakenan River and Benipis River. Based on this document, recommendations for riparian management are recommended, namely the prohibition of the application of chemicals on riparian. - Internal office memo no: 001/RO/IX/2021 dated September 15, 2021, at point 8 explains that riparian are not allowed to apply chemicals including pesticides with a distance of 50-100 from the riparian. 			

Implementation document of HCV management and monitoring implementation report in 2022, all programs have been realized, however, based on the results of field visits in the HCV area, it is known that:

- Was found that at the Danau Pasir riparian there was evidence that pesticide spraying activities had been carried out on the Danau Pasir riparian, where the results of the verification of the document for the Foreman Activity Book / Abadi Estate Supervision 1 plasma division dated 7 June 2022, explained that it had Chemical application activities (CPT) were carried out in block I08.
- There is no clear marking of HCV area boundaries in HCV areas for example in the boundaries of the Danau Pasir and Mentiakawn riparian rivers.

Non-Conformance Description (filled by auditor):

The company has not been able to show evidence that the implementation of the HCV area management and monitoring plan has been in accordance with the predetermined plan.

Root Cause Analysis (filled by organization audited):

- Lack of socialization and understanding to supervision and employees in the management of riparian zones and buffer zones 2.
- Lack of signs of information in the field regarding the boundaries of riparian zones and buffer zones related to chemical application

Correction (filled by organization audited):

3. Socialization to supervisors and employees regarding the management of riparian zones and buffer zones
4. Provision of information signs in the form of signboards and location boundaries of the riparian zone and buffer zone.

Corrective Action (filled by organization audited):

3. Head of Operating Unit Ensure that the management of river border areas and buffer zones is carried out.
4. The Head of the Operating Unit ensures that information signs on the prohibition of chemical application in riparian zones and buffer zones are maintained.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor verification on October 4, 2022.

The company shows proof of improvement in the form of:

- Absence of socialization on the prohibition of chemical use activities at PT SISM's HCV and river boundaries in Mulia 1&2 block 04 1 dated 16 September 2022, block 04.2 Mulia 3&4 and block OU 3 Mulia 5&6.
- Minutes of painting on the HCV boundary area or Mentiakau riparian at OU 3 on 10 September 2022, Plabian river OU3 9 September 2022, Senggilingan riparian on 21 September 2022, Tapal riparian on 17 September 2022, Tayap riparian on 20 September 2022 and Udan river riparian on September 19, 2022. The marking is done by painting red color on the oil palm trees.
- Minutes of socialization of chemical activities at the HCV boundary and the Mulia 1&2 riparian on 16 September 2022 to pesticide applicators.
- Minutes of socialization of chemical activities at the HCV boundary and the Mulia 3&4 riparian on 15 September 2022 to pesticide applicators.
- Minutes of socialization of chemical activities at the HCV boundary and the Mulia 5&6 riparian on 15 September 2022 to pesticide applicators.

Auditor verification on October 27, 2022.

The company shows proof of improvement in the form of:

- Minutes of Installation of Boundary pole and Sign Board for the Sungai Mulia 1-2 Boundary on September 17, 2022; Sungai Mulia 3-4 on September 20, 2022; Sungai Mulia 5-6 on 19 and 21 September 2022; and at PT SMA in August 2022.
- Recapitulation of the principal amount in the marked riparian along with the distance of the riparian.
- Guidelines that regulate the technique of painting oil palm trees on HCV boundaries and riparian refer to SOP/GPN/S/03 Regarding Management and monitoring of high conservation value areas (attached) and IOM

IOM 001/RO/IX/2021 dated 15 September 2021, point 8 explains that the river border is not allowed to apply chemicals including pesticides with a distance of 50-100 from the river.

- Documentation of installation of signboards and riparian.
- Materials for socialization of HCV and riparian and Evaluation of chemical activity socialization activities on HCV and riparian as stated in the inspection related to pesticide spray activity (attached).

Based on the above, the non-conformance is declared to have been fulfilled and will be re-verified at the next assessment.

Verified by	:	Radytio Puspanjana
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3.4.4. Opportunity for Improvement

No	Ref. Std.	Description
1	3.7.1	<p>A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender-specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training</p> <p><u>Operators of Energy and Production Equipment</u></p> <p>f. <i>Permenaker No. 38 tahun 2016</i> concerning Energy and Production Equipment. In Table E it is explained that for prime movers with a capacity of > 214.47 HP it is mandatory to have 1 class II operator and 1 class I operator for each shift.</p> <p>g. The certification unit has 2 turbine engines with a capacity of 2000 kW/ 2680.96 HP and 1800 kW/ 2412.86 HP with 2 work shifts.</p> <p>h. The certification unit has 8 class II diesel motor operators but does not yet have an operator for turbine engines.</p> <p>i. The certification unit shows the OHS Long Term Training Plan document that informs the turbine operator training program planned for 2022 to 2024.</p> <p>j. The certification unit shows a letter from the Manpower and Transmigration Office of <i>UPT</i> Labor Supervision Region I regarding confirmation of registration for OHS operator training for turbine engines which is planned to be carried out on 1-3 September 2022.</p> <p><u>Boiler Operator</u></p> <p>a. <i>Permenaker No. 1 tahun 1988</i> concerning qualifications and requirements for boiler operator. In Appendix 1 of Table 1 it is explained that for a machine with a steam capacity of > 80 tons/ hour, it is mandatory to have 3 operator class II and 2 operator class I.</p> <p>b. The certification unit has 2 boilers with a capacity of 90 tons/ hour with 2 work shifts.</p> <p>c. The certification unit has 4 operator class I but does not have operator class II.</p> <p>d. The certification unit shows the OHS Training Long-Term Plan document that informs the boiler operator training program planned for 2022 to 2024.</p> <p>e. The certification unit shows a letter from PT Global Safety (<i>PJK3</i>) regarding confirmation of registration for OHS operator training for boiler which is planned to be carried out on August 22-27 2022.</p> <p>In this case, the certification unit has the opportunity to ensure the realization of OHS operator training for turbine and boiler in 2022 in accordance with the established program. OFI</p>

3.4.5. Noteworthy Positive Components

No	Description
1	The company's commitment to implementing a sustainable palm oil management system.
2	Good teamwork and competence from the companion team.

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Agriculture Department of Ketapang Regency</p> <ul style="list-style-type: none"> • Certification unit has been reported mandatory reporting regularly i.e. <i>LPUP</i>. • Relations between the certification unit and Agriculture Department are well established. • Certification unit has already smallholder schemes and are already running. • There is no fire related information so far. 	<p>There is no negative issue related to plantation aspect.</p>
<p>Labor Agency of Ketapang Regency.</p> <ul style="list-style-type: none"> • The certification unit have CLA that has been verified by the agencies. • The certification unit has routinely reported mandatory reports to the agency manually • The minimum wage applied today is the District Minimum Wage for Plantations in 2022. • The certification unit has labor unions which have been registered by the Labor Agency • The certification unit has included workers in the" <i>BPJS Kesehatan dan Ketenagakerjaan</i>" program • Over the past year there have been no issues related to child labor, discrimination and human rights violations in the company operational area. • Communication relations between agencies and companies are fairly well established. 	<p>There is no negative issue related to labor. The management unit has complied with RSPO standard.</p>
<p>Environmental Agency of Ketapang Regency</p> <ul style="list-style-type: none"> - The company has EIA documents and has received environmental feasibility on year 2018 for PT SMA & PT SISM (addendum). - The company has a Temporary Hazardous Waste Storage (TPS LB3) located on Mill and each Estate, approved by Ketapang, Province Kalimantan Barat and KHLK Regency on 2020. - Hazardous Waste management activities carried out by storing hazardous Waste in licensed hazardous waste storage and transported have permission by KLH. Quarterly management reporting to relevant agencies. - The company has land application permit. - The company has tested the quality of factory wastewater per month and reported the results of testing to Environmental Agency Ketapang Regency per quarter. - The company has conducted POME quality testing per semester and reports the results of testing to Environmental Agency Ketapang Regency. - The company has conducted noise, vibration and noise 	<p>According to field observation, there are no environment pollution from estate and mill operational.</p>