

***Roundtable on Sustainable Palm Oil Certification
RSPO***

[✓] Surveillance

Name of Management Organisation : Kayung Agro Lestari Palm Oil Mill – PT Kayung Agro Lestari subsidiary of Austindo Nusantara Jaya Agri

Plantation Name : PT Kayung Agro Lestari : Sungai Gemilang Teduh 1, Sungai Gemilang Teduh 2, Gunung Sejahtera Tumbuh 1, Gunung Sejahtera Tumbuh 2, and Mitra Laman Mayang Sentosa, Mitra Bina Satong Lestari, and Mitra Lestari Abadi Bersama

Location : Laman Satong Village, Matan Hilir Utara Sub District, Ketapang District, Kalimantan Barat Province, Indonesia

Certificate Code : **MUTU-RSPO/137**

Date of Certificate Issue : 11 November 2019 Date of License Issue : 11 November 2022

Date of Certificate Expiry : 10 November 2024 Date of License Expiry : 10 November 2023

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-3	26 to 30 September 2022	Ardiansyah (Lead Auditor Witnessing), Bayu Yogatama (Lead Auditor Witnessed), Rizliani Aprianita Hasibuan, Septian Maulana, Ririn Wahyuni Sipayung	Naila Karima	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-3	28 October 2022

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Figure 1. Location Map of PT Kayung Agro Lestari

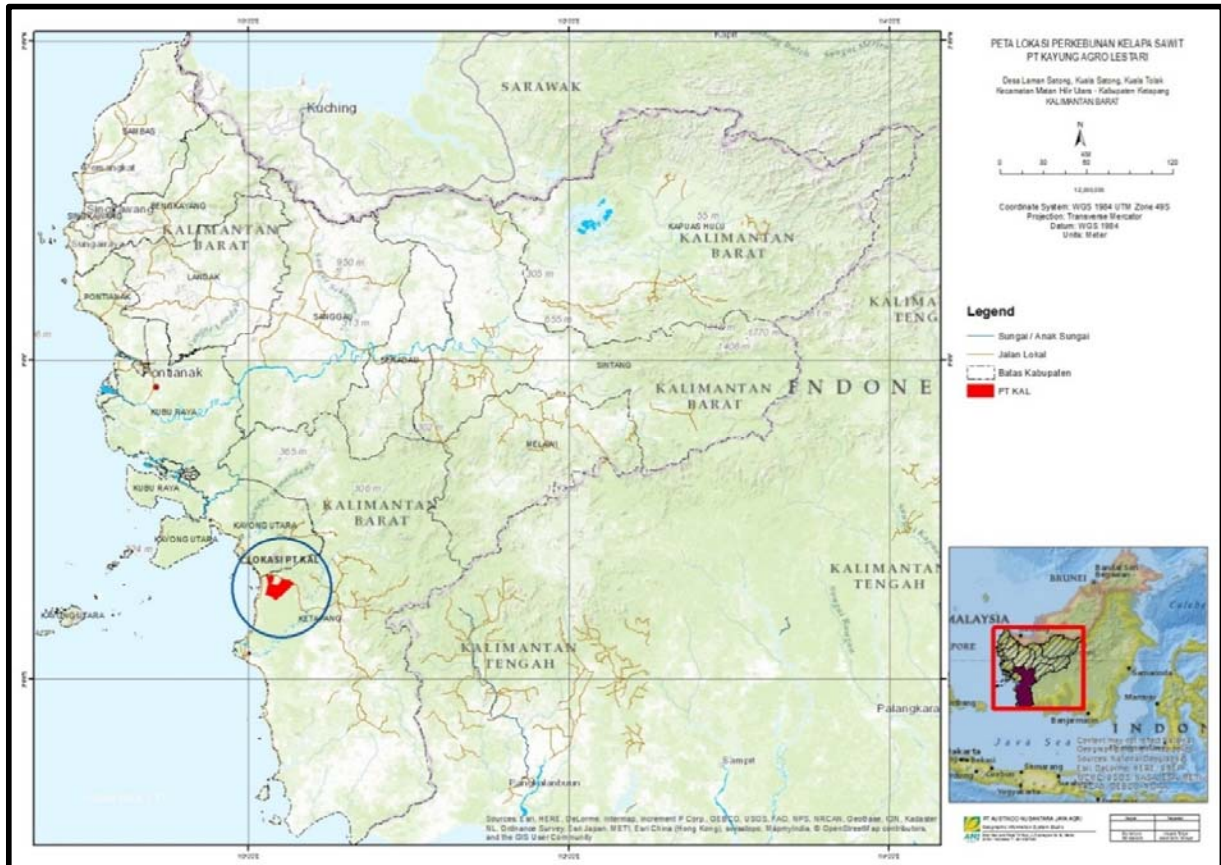
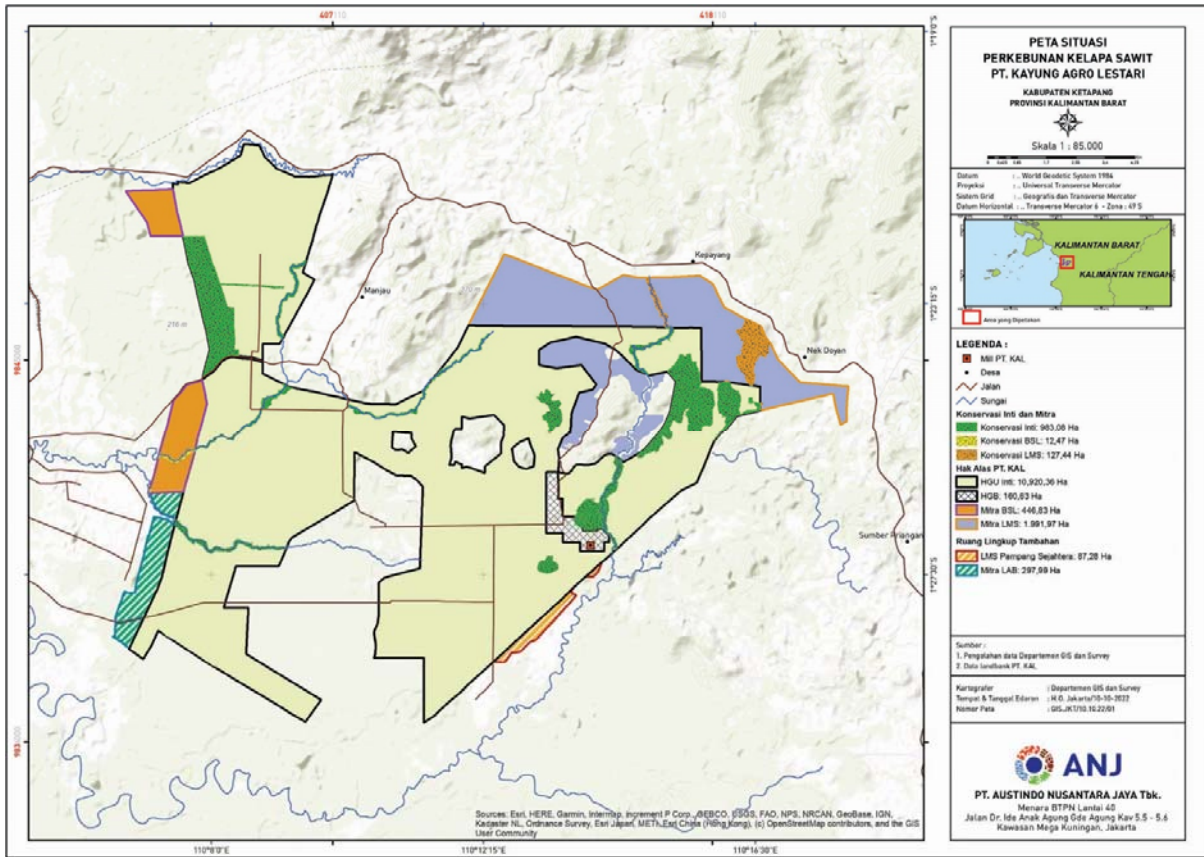


Figure 2. Operational Map of PT Kayung Agro Lestari



Abbreviations Used

ABKT	:	<i>Area Bernilai Konservasi Tinggi</i> (High Conservation Value Area)
ALS	:	Assessor License Scheme
AMDAL	:	<i>Analisa Mengenai Dampak Lingkungan</i>
ANDAL	:	Environmental Impact Analysis Main Report / <i>Analisa Dampak Lingkungan</i>
ANJ	:	Austindo Nusantara Jaya
APU	:	<i>Air Permukaan Umum</i>
BKSDA	:	<i>Badan Konservasi Sumber Daya Alam</i>
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i>
BPN	:	<i>Badan Pertanahan Nasional</i>
BSL	:	Bina Satong Lestari
hazardous	:	<i>Bahan Berbahaya dan Beracun</i> (Hazardous and Toxic Material)
CH	:	Certificate Holder
CITES	:	Convention on International Trade in Endangered Species
CID	:	Community Involvement Development
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
CSPO	:	Certified Sustainable Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CWT	:	Central Workshop and Traction
EFB	:	Empty Fruit Bunch
E - SPB	:	<i>Surat Pengantar Buah Elektronik</i> (Electronic FFB letter)
EWS	:	Early Warning System
FFB	:	Fresh Fruit Bunch
FPIC	:	Free, Prior and Informed Consent
GHG	:	Green House Gas
GM	:	General Manager
GMO	:	General Manager Office
GST	:	<i>Gunung Sejahtera Tumbuh</i>
HCV	:	High Conservation Value
HGB	:	<i>Hak Guna Bangunan</i>
HGU	:	<i>Hak Guna Usaha</i>
HIRAC	:	Hazard Identification, Risk Assessment and Control
HRD	:	Human Resource Development
IOM	:	Inter Office Memo
IPB	:	Institut Pertanian Bogor
IPM	:	Integrated Pest Management
IUP	:	<i>Izin Usaha Perkebunan</i>
IUP-P	:	<i>Izin Usaha Perkebunan – Pengolahan</i> (plantation business license for processing)
ISCC	:	<i>International Sustainability and Carbon Certification</i>
KAL	:	Kayung Agro Lestari
KER	:	Kernel Extraction Rendemen
KHT	:	<i>Karyawan Harian Tetap</i> (Daily permanent worker)
LA	:	Land Application
LD	:	Lethal Dose
LSM	:	<i>Lembaga Swadaya Masyarakat</i>
LDPHD	:	<i>Lembaga Desa Pengelola Hutan Desa</i>
MCB	:	Miniature Circuit Breaker
MCU	:	Medical Check-Up

MHU	:	Matan Hilir Utara
MSDS	:	Material Safety Data Sheet
NGO	:	Non-Government Organization
NPP	:	New Planting Procedure
OER	:	Oil Extraction Rendemen
OFI	:	Opportunity For Improvement
OHS	:	Occupational Health and Safety
PAP	:	<i>Pajak Air Permukaan</i>
PK	:	Palm Kernel
PK	:	Palm Kernel
PKS	:	<i>Pabrik Kelapa Sawit (Palm Oil Mill)</i>
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
P2K3	:	<i>Panitia Pembina Kesehatan dan Keselamatan Kerja (OHS Committee)</i>
R & D	:	Research & Development
RI	:	Republik Indonesia
RKL-RPL	:	Environmental Management Plan (RKL) and Environmental Monitoring Plan (RPL)
RTE	:	Rare Threatened and Endangered
SCCS	:	Supply Chain Certification System
SGT	:	Sungai Gemilang Teduh
SIA	:	Social Impact Assessment
SKM	:	Sinar Karya Mandiri
SKT	:	<i>Surat Keterangan Tanah (Land Certificate)</i>
SOP	:	Standard Operational Procedure
SPO	:	Sustainability Palm Oil
TNGP	:	Taman Nasional Gunung Palung
UPTD	:	<i>Unit Pelaksana Teknis Daerah</i>
UMSK	:	<i>Upah Minimum Sektoral Perkebunan (City Minimum Sectoral Wage)</i>
WHO	:	World health Organization
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant
YIARI	:	<i>Yayasan Inisiasi Alam Rehabilitasi Indonesia</i>

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20th April 2020 RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020 	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT Kayung Agro Lestari subsidiary of PT Austindo Nusantara Jaya Agri	
1.2.2	Contact person	Antoperis Tarigan	
1.2.3	Organisation address and site address	<ul style="list-style-type: none"> RSPO registered company: Sinarmas Land Plaza, Lantai 7, Jalan Pangeran Diponegoro No.18 Medan 20152, Sumatera Utara Liaison Office: Menara BTPN Lantai 40 Jalan Dr. Ide Anak Agung Gde Agung Kav 5.5 – 5.6, Kawasan Mega Kuningan, Jakarta 12950 T: +62 21 2965 1777 F: +62 21 2965 1788 	
1.2.4	Telephone	+62-61 453 7480	
1.2.5	Fax	+62-61 453 8366	
1.2.6	E-mail	antoperis.tarigan@anj-group.com	
1.2.7	Web page address	www.anj-group.com	
1.2.8	Management Representative who completed the application for certification	Antoperis Tarigan	
1.2.9	Registered as RSPO member	1-0032-07-000-00, 27 February 2007	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	There is an extension in the scope of supply based, previously in ASA-2 consist of 5 estates namely Sungai Gemilang Teduh 1, Sungai Gemilang Teduh 2, Gunung Sejahtera Tumbuh 1, Gunung Sejahtera Tumbuh 2 and Mitra Estate (Laman Mayang Sentosa 1,991.97 Ha and Bina Satong Lestari 446.83 Ha). On ASA-3, there is additional area in Mitra Estate (Laman Mayang Sentosa 87.28 Ha and Lestari Abadi Bersama 297.99 Ha).	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Kayung Agro Lestari POM	Laman Satong Village, Matan Hilir Utara Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 01° 26' 56" E 110° 13' 44"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Gunung Sejahtera Tumbuh (GST-1)	Laman Satong Village, Matan Hilir Utara Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 01° 25' 13" E 110° 12' 34"

	Gunung Sejahtera Tumbuh (GST-2)	Laman Satong Village, Matan Hilir Utara Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 01° 26' 25"	E 110° 13' 26"					
	Sungai Gemilang Teduh (SGT-1)	Laman Satong Village, Matan Hilir Utara Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 01° 24' 16"	E 110° 14' 13"					
	Sungai Gemilang Teduh (SGT-2)	Laman Satong Village, Matan Hilir Utara Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 01° 25' 39"	E 110° 09' 59"					
	Mitra Laman Mayang Sentosa (624 Smallholders)	Laman Satong Village, Matan Hilir Utara Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 01° 25' 54"	E 110° 13' 26"					
	Mitra Bina Satong Lestari (738 Smallholders)	Laman Satong Village, Matan Hilir Utara Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 01° 26' 25"	E 110° 13' 22"					
	Mitra Lestari Abadi Bersama (1170 Smallholders)	Laman Satong Village, Matan Hilir Utara Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 01° 28' 02"	E 110° 06' 43"					
1.5	Description of Area Statement								
1.5.1	Tenure								
	• State		13,095.44	Ha					
	• Community		809.62	Ha					
1.5.2	Area Statement								
	Description	Own Estates	Smallholders	Total					
	• Total area	11,080.99	2824.07	13,905.06 Ha					
	• Mature area	8,777.79	2295.24	11,073.03 Ha					
	• Immature area	267.14	45.68	312.82 Ha					
	• Mill	14.30	-	14.30 Ha					
	• Infrastructure (warehouse, Emplacement)	146.33	-	146.33 Ha					
	• Others area	360.03	93.48	453.51 Ha					
	• Future Planted	532.32	249.76	782.08 Ha					
	• HCV	983.08	139.91	1,122.99 Ha					
1.6	Planting Year and Cycles								
1.6.1	Age profile of planting year								
	Planting Year	Hectarage (Ha)							
		GST 1	GST 2	SGT 1	SGT 2	MLMS	MBSL	MLAB	Total
	2010	7.55	395.76	108.37	-	48.10	-	-	559.78
	2011	1,092.59	1,303.55	818.53	-	1,001.73	-	-	4,216.40
	2012	1,288.04	450.07	1,323.52	556.09	440.31	208.59	-	4,266.62
	2013	17.78	79.42	120.21	1,194.07	392.03	79.79	124.69	2,007.99
	2016	-	-	-	22.24	0.00	-	-	22.24
	Sub Total Mature	2,405.96	2,228.80	2,370.63	1,772.40	1,882.17	288.38	124.69	11,073.03
	2012	-	53.82	-	-	-	-	-	53.82
	2013	-	14.78	-	125.6	-	13.79	18.02	172.19

	2016	-	-	-	72.94	-	-		72.94	
	2017	-	-	-		-	-	13.87	13.87	
	Sub Total Immature	-	68.60	-	198.54	-	13.79	31.89	312.82	
	TOTAL	2,405.96	2,297.40	2,370.63	1,970.94	1,882.17	302.17	156.58	11,385.85	
1.6.2	New Planting area after January 2010				10,826.07 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 (%)			
	KAL POM	90	284,555.40	58,515.33	20.56	9,289.80	3.26			
	<i>Production data source from September 2021 to August 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)	%			
	GST 1	2,922.63	2,405.96	51,821.47	21.54	51,821.47	100			
	GST 2	2,896.49	2,228.80	41,054.81	18.42	41,054.81	100			
	SGT 1	2,837.50	2,370.63	47,616.79	20.09	47,616.79	100			
	SGT 2	2,424.37	1,772.40	29,048.37	16.39	29,048.37	100			
	Mitra Laman Mayang Sentosa (624 Smallholders)	1,991.97	1,795.18	36,641.87	20.41	36,641.87	100			
	Mitra Bina Satong Lestari (738 Smallholders)	446.83	288.38	3,115.43	10.80	3,115.43	100			
	TOTAL	13,519.79	10,861.35	209,298.75	19.27	209,298.75	100			
	<i>Production data source from September 2021 to August 2022</i>									
1.7.3	FFB description from other source									
	Name of sources/ Organisation	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill					
					FFB (tonnes/year)					
	Mitra Lestari Abadi Bersama	Associate smallholders	1170	124.69	1,293.14					
	Mitra Laman Mayang Sentosa (SKT)	Associate smallholders	44	86.99	1,288.34					
	Propose Kemitraan	Associate smallholders	-	5.83	156.92					
	PT. SKM	Independent supplier	-	-	17,723.50					
	CV. Cahaya Sejati	Independent supplier	-	-	36,880.48					
	CV. Abadi Log Jaya	Independent supplier	-	-	17,763.81					
	CV. Desy Cahaya Mandiri	Independent supplier	-	-	148.36					
	TOTAL					75,254.54				
	<i>*Production data source from September 2021- August 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 (September 2021 to August 2022) (MT)					
	FFB Estate Processed	195,000	208,498.89					
	FFB Scheme or associate Smallholders Processed	45,000						
	CPO Production	51,600	42,961.24					
	Palm Kernel (PK) Production	7,800	7,325.71					
1.8.2	Product selling	Actual selling product for last year (September 2021 to August 2022) (MT)						
	Type of selling product							
	CSPO sold as RSP0 certified product	18,600.00						
	CSPK sold as RSP0 certified product	5,050.00						
	CSPO sold under other scheme	0						
	CSPK sold under other scheme	0						
	CSPO sold as conventional	21,268.76						
	CSPK sold as conventional	1,942.45						
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	GST 1	2,922.63	2,405.96	53,500	22.24			
	GST 2	2,896.49	2,228.80	42,500	19.07			
	SGT 1	2,837.50	2,370.63	50,000	21.09			
	SGT 2	2,424.37	1,772.40	30,000	16.93			
	Mitra Laman Mayang Sentosa (624 Smallholders)	2,079.25	1,882.17	39,500	20.99			
	Mitra Bina Satong Lestari (738 Smallholders)	446.83	288.38	1,300	8.30			
	Mitra Lestari Abadi Bersama (1170 Smallholders)	297.99	124.69	3,200	11.10			
	TOTAL	13,905.06	11,073.03	220,000	19.81			
	<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 (%)	
	KAL POM	90	220,000	46,200	21	7,700	3.5	MB
	<i>*Projected CSPO and CSPK production for 12 months of certificate</i>							
1.9	Other Certifications							
	ISO 9001:2015			-				
	ISO 14001:2015			EMS Certificate valid until 2024				
	ISO 45001:2018			ISO 45001 Certificate valid until 2024				
	SMK3			OHS Management System valid until 2025				
	Others			ISPO Certificate with period 2018 to 2023				

1.10	Time Bound Plan				
1.10.1	Time Bound Plan for Other Management Units				
MILL	Management Unit Time Bound Plan	Estate (Supply Base)	Time Bound Plan	Location	Status
ANJA Siais (PT ANJA Siais)	2014	Lembah Subur Utara	2014	Tapanuli Selatan District, Sumatera Utara Province, Indonesia	Certified
		Lembah Subur Selatan	2014		Certified
		Koperasi Binasari	2022		Certified
Jangkang (PT Sahabat Mewah Makmur)	2009	Jangkang	2009	Belitung Timur District, Bangka Belitung Province, Indonesia	Certified
		Balok	2009		-
		Joseph Jaya	2009		-
		Sari Bunga	2009		-
		Air Ruak	2009		-
		Koperasi Mitra Lestari	2019		Certified
		Koperasi Mitra Lestari (1.79 Ha)	2025		-
		Koperasi Mitra Anugrah	2019		Certified
		Koperasi Mitra Anugrah (3.86 Ha)	2025		-
		Koperasi Sambar Jaya Makmur	2019		Certified
		Koperasi Sambar Jaya Makmur (4.22 Ha)	2025		-
		Koperasi Lindong Raya	2020		Certified
		Koperasi Lindong Raya	2025		-
		Koperasi Berhimpun Sejahtera	2020		Certified
		Koperasi Berhimpun Sejahtera	2025		-
		Koperasi Tiong Sejahtera	2025		-
		Koperasi Gunung Nyerudong	2025		-
Bumdes Balok	2025	-			
Binanga (PT ANJ Agri)	2012	Estate Wilayah Timur	2012	Padang Lawas Utara District, Sumatera Utara Province, Indonesia	Certified
		Estate Wilayah Tengah	2012		Certified
		Estate Wilayah Barat	2012		Certified
KAL POM (PT. Kayung Agro Lestari)	2019	Sungai Gemilang Teduh 1 (SGT-1)	2019	Ketapang District, Kalimantan Barat Province, Indonesia	Certified
		Sungai Gemilang Teduh 2 (SGT-2)	2019		Certified
		Gunung Sejahtera Tumbuh 2 (GST-2)	2019		Certified
		Gunung Sejahtera Tumbuh 1 (GST-1)	2019		Certified
		Koperasi Laman Mayan Sentosa	2019		Certified
		Koperasi Laman Mayan Sentosa (87 Ha)	2025		IC
		Koperasi Bina Satong Lestari	2021		Certified
		Koperasi Lestari Abadi Bersama	2025		IC

PMP POM (PT Putera Manunggal Perkasa)	2021	Kasuari Estate	2021	Sorong Selatan District, Papua Barat Province, Indonesia	Certified
		Cenderawasih Estate	2021		Certified
		Koperasi Sukka Mandiri Bersama	2021		Certified
		PT Permata Putera Mandiri (Gaina Estate)	2021		Certified
		PT Permata Putera Mandiri (Metamani Estate)	2021		Certified
No POM yet		PT Galempa Sejahtera Bersama	2027	Empat Lawang District, Sumatera Selatan Province, Indonesia	-
<p>TBP is updated and approve by RSPO on 29 September 2022.</p> <p>Document of revision of certification time-bound statement of PT ANJA and its subsidiaries on June 16 2022, with justification i.e:</p> <ul style="list-style-type: none"> - RSPO certification of PT GSB, which was originally targeted to be obtained in 2020, has been changed to 2027 because the land compensation process has not been completed so planting and factory construction were also delayed. PT GSB's palm oil mill is planned to be built in 2023. RSPO certification will take place after the mill is operational. - RSPO certification of smallholder in PT Sahabat Mewah dan Makmur has targeted in 2020 and 2021, has been changed to 2025 because NPP process. 					
1.10.2	Progress of Associated Smallholders and Out growers for Certifiable Standard				
	<p>Management has had 3 KUD which supply the FFB to the mill which are Laman Mayan Sentosa Cooperative, Bina Satong Lestari Cooperative and Lestari Abadi Bersama Cooperative. Laman Mayang Sentosa & Bina Satong Lestari Cooperative has been certified, and for Lestari Abadi Bersama Cooperative has been audited in this ASA-3. Total certification area in ASA-3 is 13,905.06 Ha.</p>				

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-3	<p>1. Ardiansyah (Lead Auditor Witnessing). 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 witnessing auditor team.</p> <p>2. Bayu Yogatama (Lead Auditor Witnessed). Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism, Bogor Agricultural University. Has attended the ISO 9001: 2015 Quality Auditor / Lead Auditor Course Quality Management System (QMS) course and ISO 19011: 2011 Guidelines for Auditing Management System, ISPO Lead Training, RSPO Lead Training, RSPO SCCS Training. Green Industry Lead Training, SA 8000, IHT RSPO NPP, IHT RSPO RaCP, IHT ISO 17021, and IHT ISO 17065. Having experience working in plywood field as Inspector in foreign private company. Currently working for an independent certification body. During this assessment, he verified Legal, TBP, Social, SCCS, Environment, HCV and GHG.</p> <p>3. Riziani Aprianita Hasibuan (Auditor). Indonesian Citizen. Bachelor and Magister of Agribusiness, Faculty of Agriculture. She had followed training such as RSPO Lead Auditor Training, SA 8000, Lead Auditor ISO 9001:2008, ISO 14001:2004, ISPO Auditor training and followed several IHT related to environment, BMP etc. She has been involved in several audit activities related to sustainable palm oil certification since 2015 covering social aspect, health and safety aspect, worker welfare and waste management aspect. During the assessment she assigned to verified aspects of worker welfare and transparency.</p> <p>4. Septian Maulana (Auditor). Indonesian Citizen, Bachelor of Economic, Pamulang University. Have experience as sustainability staff on oil palm plantation. Training have been followed including Occupational Health and Safety Expert Candidate certification by Ministry of Manpower and Transmigration of Indonesia; Basic Fire Fighting and Basic First Aid; Awareness Integrated Management Systems (ISO 14001, and ISO 45001 in 2020); Awareness (ISO 19011, ISO 17065; and ISO 17021) in 2020; ISO 9001:2015 Lead Auditor in 2021, ISPO Lead Auditor in 2021, RSPO Lead Auditor in 2021 and Awareness Social Audit SMETA in 2022. In this audit activity was verified Best Management Practices Aspect, Long-term Management Plan and OHS.</p> <p>5. Ririn Wahyuni Sipayung (Trainee Auditor). Experience working as a Sustainability Assistant for 6 years in several private oil palm plantation companies in Indonesia. The trainings that have been attended include Training Lead Auditor 9001:2015 IRCA, Refreshment New ISPO (PERMENTAN 38 of 2020), Awareness (ISO 9001, ISO 14001, ISO 45001: 2018, ISO 19011: 2018, ISO 17021: 2015, ISO 17065 : 2012), Management of HCV in ISPO, In House Training (Best Management Practice, Environment, Employment, Social, and Transparency), <i>Calon Ahli Keselamatan dan Kesehatan Kerja</i> (AK3U) by the Ministry of Manpower of the Republic of Indonesia, ISPO Auditor Certification by LPP and ISPO Commission, Implementation K3 in Oil Palm Plantations, Handling and Control of Land Fires by <i>Dinas Perkebunan KALBAR</i> Province, Hazardous Waste Management by <i>Dinas Lingkungan Hidup of KALBAR Province</i>, Traceability Supply Chain and Smallholder Engagement and so on. as carried out several audit activities and this time audit carried out verification of the Environmental, HCV and GHG aspects under the supervision of the lead auditor.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-3	<p>Number of auditors: 3 Auditors, 1 Lead Auditor Witnesser and 1 Auditor trainee</p> <p>Number of days for ASA-3 at site: 5 days</p> <p>Number of working days for ASA-3 at site: 15 Working days</p>
2.2.2	Assessment Process
ASA-3	The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Kayung Agro Lestari to the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The

	<p>Indonesia National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.</p> <p>Previously during the ASA-2, the scope of certification is 13,519.79 Ha which divided 11,080.99 Ha own estates and 2,438.80 Ha fully managed smallholders (Koperasi Laman Mayan Sentosa and Koperasi Bina Satong Lestari). On this assessment (ASA-3) there is an additional area covering 385.27Ha in Mitra Estate for area on behalf of Koperasi Laman Mayang Sentosa 87.28 Ha and Koperasi Lestari Abadi 297.99 Ha. Based on the explanation above the total scope of certification is 13,905.06 Ha.</p> <p>The audit program is included as Appendix II. 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.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>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. Furthermore, during field observation auditor only verification the activity and interview process carried separately by telephone. Document verification conducted separately through the electronic files.</p> <p>Public Stakeholder Notification was made on Mutu International 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 taken into account in the assessment</p> <p>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 wife 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.</p> <p>Commonly, the audit activities went smoothly with good support from the unit management. The presentation of documents is presented quite well by involving related personnel.</p> <p>Some opportunities for improvement of the results ASA-3 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-4). Improvement of findings from main assessment findings were observed by auditors at this ASA-3 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-3</p> <p>The assessment program please find Appendix 2</p>
<p>2.2.3</p>	<p>Locations of Assessment</p>

<p>ASA-3</p>	<p>The sampling location consider the issue arise from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>KAL POM</p> <ul style="list-style-type: none"> • Security Observations and interview regrading work procedure, aspect of employment and OHS Aspect. • Sortation and Grading. Observations and interviews regarding work procedures, OHS aspects, and aspects of employment • Weighbridge Observation and interview related SCCS implementation and employment. • Sterilizer Station. Observations and interviews related to work procedures, OHS implementation and employment. • Loading Ramp Station. Observations and interviews related to work procedures, OHS implementation and employment. • Clarification Station. Observations and interviews related to work procedures, OHS implementation and employment • Engine room. Observations and interviews related to work procedures, OHS implementation and employment. • Boiler Station. Observations and interviews related to work procedures, OHS implementation and employment. • Kernel Station. Observations and interviews related to work procedures, OHS implementation and employment • Workshops. Observations on OHS and Environmental management • Material Warehouse. Observations on OHS and Environmental management • Oil Warehouse. Observations on OHS and Environmental management • Chemical Warehouse. Observations on OHS and Environmental management • WTP. Observation of water management in PKS for both processing and domestic activities and flow meter conditions. • Empty Bunch Areas. Observations on OHS and Environmental management • Hazardous Waste warehouse. Observations on OHS and Environmental management • WWTP. Observations regarding the condition of the WWTP, there were no pipe leaks, and the digital flowmeter was functioning properly. • Hydrant simulation. Observations related to fire emergency response in Mill. • Dispatch Area Observations OHS aspects and waste management <p>GST1</p> <ul style="list-style-type: none"> • EFB application block G42. Observations and interviews related to work procedures, OHS implementation and employment. • Upkeep block F33. Observations and interviews related to work procedures, OHS implementation and employment. • Harvesting block F27. Observations and interviews related to work procedures, OHS implementation and employment. • Weeding block F30/31. Observations and interviews related to work procedures, OHS implementation and employment. • Loose fruit picker block F22/23. Observations and interviews related to work procedures, OHS implementation and employment. • Fire monitoring tower block F24. Observations related to land fire control. • Contractor Housing Observation and Interview regrading waste management, facility, and OHS implementation <p>SGT-1</p> <ul style="list-style-type: none"> • Harvesting Division 3 Block C32. Observations and interviews related to aspects of BMP, OHS, and employment. • Road Maintenance Division 3. Observations and interviews related to aspects of BMP, OHS. • Rodenticide Application Division 3 Block B29. Observations and interviews related to aspects of BMP, OHS and Employment. • Rinse House. Observations related to BMP, OHS and Environmental aspects.
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- **Fire Tower No. 05.** Observation of the condition of fire monitoring facilities and infrastructure.
- **HGU Pole No. 105, 102 dan 103 Division 3 Blok C29.** Observations related to the condition of the boundary markers and the suitability of the coordinate points.
- **HCV Malaka River Divisi 3 Blok C29.** Observations related to conservation area management.

SGT-2

- **Stop Bund dan Water Level Division 5 Blok A41.** Observations related to water management on peatlands.
- **Fire Tower Blok B42 Division 5.** Observation of the condition of fire monitoring facilities and infrastructure.
- **Harvesting Division 5 Blok A41.** Observations and interviews related to aspects of BMP, OHS and Employment.
- **Racking Manual Division 5 Blok A42.** Observations and interviews related to aspects of BMP, OHS and Employment.
- **Piezometer No. TP16 Division 5 Blok B43.** Observations related to peatland management.
- **Rodenticide Application Division 5.** Observations and interviews related to aspects of BMP, OHS and Employment.

GST-2

- **HGU Pole No. KAL 006, KAL 007 dan KAL 008.** Observations related to the condition of the boundary markers and the suitability of the coordinate points.
- **HCV Area Bukit Duri Blok F48/49.** Observations related Observations related to conservation area management.
- **Harvesting Division 14 Blok E55/56.** Observations and interviews related to aspects of BMP, OHS and Employment.
- **Field Drain Maintenance Division 14 Blok E52.** Observations and interviews related to aspects of BMP, OHS and Employment.
- **Piezometer dan Subsidence Blok F46.** Observations related to the management of peat areas.
- **Land Application Division 14 Blok F43/44.** Observations and interviews related to aspects of BMP, OHS and Employment.
- **Barn Owl Box Division 14 Blok F44.** Observations related to the application of biological pest control.

Mitra Estate

MLMS

- **Application Rat Poison Activity Blok H32.** Observation and interview with 6 Cooperative workers regrading OHS aspect, work procedure and Payment.
- **BOB Blok H32.** Observation IPM implementation
- **Manual maintenance blok G26.** Observation and interview with 9 workers regrading OHS aspect, work procedure and Payment.
- **Harvesting Blok G32** Observation and interview Cooperatives 2 Workers 1 Foreman regrading OHS aspect, work procedure and Payment.
- **Lose fruit picking Blok I 20** Observation and interview Cooperatives 2 Workers 1 Foreman regrading OHS aspect, work procedure and Payment.

MBSL

- **Maintenance of Collecting Point blok K8/2012.** Observations and interviews related to work procedures, OHS implementation and employment.
- **Weeding blok 32.** Observations and interviews related to work procedures, OHS implementation and employment.
- **Harvesting blok K38/K39.** Observations and interviews related to work procedures, OHS implementation and employment.
- **HGU Pole No. KAL 025 Blok K09 & KAL 026 Blok K06.** Observations related to the condition of the boundary markers and the suitability of the coordinate points.

MLAB

	<ul style="list-style-type: none"> • Loose fruit picker block K53. Observations and interviews related to work procedures, OHS implementation and employment. • Harvesting block K53. Observations and interviews related to work procedures, OHS implementation and employment. • Weeding block K49. Observations and interviews related to work procedures, OHS implementation and employment. • Maintenance of Collecting Point block K53. Observations and interviews related to work procedures, OHS implementation and employment.
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-3	<p>Summary of stakeholder consultation process Consultation of stakeholders for PT Kayung Agro Lestari was held by:</p> <ul style="list-style-type: none"> • Public Notification on MUTU website • Public consultation with NGOs (by email) such as WALHI, WWF, AMAN and Sawit Watch 09 September 2022 • Public consultation meeting with government institution (Land Agency, Plantation Agency, Environmental Agency & Manpower Agency) 27 September 2022 • Public consultation meeting with communities on 27 September 2022 • Public consultation meeting with internal stakeholders and contractor 27 September 2022 <p>Numbers of input from stakeholders were clarified by PT Kayung Agro Lestari</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (ASA-4) will be conducted eight (8) months to twelve (12) months after date of annual license.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of KAL POM – PT Kayung Agro Lestari subsidiary of PT Austindo Nusantara Jaya Agri operation consisting of one (1) mill, four (4) oil palm estates and Mitra Estate (2,532 smallholders).

During the assessment, no non-conformity identified and five (5) opportunities for improvement were identified.

MUTUAGUNG LESTARI found that KAL POM – PT Kayung Agro Lestari subsidiary of PT Austindo Nusantara Jaya Agri complied with the requirements of **Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, endorsed on 12 November 2020.**

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY	
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
<p>1.1.1 Unit of Certification has a SOP for communicating and providing information that is approved and signed by the External Affairs Director, with document no. SOP-Leg-02 revision 01 and has been in effect since April 1, 2013. Based on the SOP, it has been explained that communication and information sharing is divided into 2:</p> <ul style="list-style-type: none"> • Internal communication and information sharing. • External communication and information sharing. <p>The SOP explains the types of information that may be accessed/provided in general and information that is confidential and requires approval from company management. The SOP also explains the person responsible for providing information both internally and externally, namely the Human Resources Officer or External Affairs Officer. The documents that can be accessed by the public are documents with general categories and with approval from management such as AMDAL, Employee data, accidents, Social Security, Land Application permits, Policies, HCV Documents, HGU Documents, Procedures, CSR, HIRAC, etc.</p> <p>1.1.2 Unit of Certification has also reported several mandatory reports on environmental aspects, for example</p> <ul style="list-style-type: none"> • Land Use Realization Report to BPN Ketapang Regency which was submitted on April 15, 2022. • Progress Report on the Implementation of the First Quarter 2022 Plantation Business License Activities submitted on April 15, 2022. • Land Use Realization Report to BPN Ketapang Regency submitted on April 3, 2022. • Progress Report on the Implementation of Plantation Business License Activities for Quarter II 2022 which was submitted on August 3, 2022. • Report on Investment Activities to BKPM Online for the Second Quarter of 2022 on July 11, 2022. • Report on Investment Activities to BKPM Online for the First Quarter of 2022 on April 4, 2022. Report of RKL – RPL Semester I 2022 to the Ministry of Environment and Forestry on July 29, 2022. • Report of RKL – RPL Semester I 2022 to the Department of Public Housing for Settlement and Environmental Areas of Ketapang Regency on July 14, 2022. • Report of RKL – RPL Semester I 2022 to the Environment Agency of West Kalimantan Province on July 14, 2022. • Report on the management of liquid waste for the period of August 2022 which was received at the Ketapang Regency Environmental Service on 07 September 2022. 	

- The liquid waste management report for the July 2022 period was received by the Ketapang Regency Environmental Service on 25 July 2022.
- The June period liquid waste management report was received by the Ketapang Regency Environmental Service on 28 June 2022.
- Report on the management of Hazardous and Toxic Waste for the period April 2022 – June 2022 to the Ministry of Environment and Forestry on July 29, 2022.
- Report on the management of Hazardous Waste for the period April 2022 – June 2022 to the Department of Public Housing for the Settlement and Environmental Areas of Ketapang Regency on July 14, 2022.
- Report on the management of Hazardous and Toxic Waste for the period April 2022 – June 2022 to the Environment Agency of West Kalimantan Province on July 14, 2022.

The report has been submitted in the appropriate language, namely Bahasa.

1.1.3

The Company has shown a record of requests for information and responses given that are listed in the Logbook of external communications and information giving. The document provides information regarding the date and number of the letter, the sender, the destination, the subject of the letter, the response, the date of the response, and information. The examples of incoming letters related to requests for information and responses are as follows:

- Incoming letter dated July 6, 2022 from the Kuala Satong Village Government regarding the Application for Land Assistance in Surau Nurul Taqin Kuala Satong Village, the letter has been received and responded to by management on the same date with an answer that management will assist the Village.
- Incoming letter dated July 25, 2022 from UPTD Puskesmas Kuala Satong relating to a request for funding for health services in Laman Satong Village which was responded to by management on August 22, 2022 with the response that the request was approved.

Based on interviews with Laman Satong & Kuala Satong Village Representatives, it is known that the company has conducted socialization to the Village regarding the mechanism for requesting information from the company. If there is a request for information, the village will send a letter to the company (CID section) and the company will respond to it.

1.1.4

Unit of Certification has a SOP for communicating and providing information that is approved and signed by the External Affairs Director, with document no. SOP-Leg-02 revision 01 and has been in effect since April 1, 2013. The SOP also explains the following:

- If there is a proposal / request for information on company participation obtained from external parties, the external relations officer within 3 days of receiving the proposal must be followed up by submitting the information to the general manager and external relations manager in charge of each region.
- Within no later than 3 months after submitting information from external parties to management and have not received a response, external relations will directly state that the company's proposal/application for participation is rejected by the company.
- External relations officer is responsible for communicating to external parties regarding the acceptance and/or rejection of the company's participation both verbally and in writing, as well as updating the status in the communication logbook and providing external information.

Based on the results of interviews with trade unions and the gender committee, it is known that the company has conducted socialization related to SOPs for communication and providing information. This is evidenced by the representatives of the trade unions and the gender committee understanding and explaining the procedure.

1.1.5

Unit of Certification has shown the PT Kayung Agro Lestari Stakeholder Register document updated in June 2022. Based on the document, there are 137 stakeholders related to PT Kayung Agro Lestari which include government stakeholders (province, district, sub-district and village), the authorities (TNI/POLRI), the customary council, partner cooperatives, village organizations, corporations, mass media and NGOs, internal stakeholders, contractors including Hazardous waste contractors and FFB suppliers. The stakeholder register explains the name, agency/position, location, category and contact person number.

<p>Based on the stakeholder list document, it is known that these contacts can be contacted through interviews with representatives of internal and external stakeholders, for example, interviews with the Environmental Agency of Ketapang Regency.</p>	
<p>Status: Comply</p>	
<p>1.2 The unit of certification commits to ethical conduct in all business operations and business transactions.</p>	
<p>1.2.1 Unit of Certification has a policy related to the code of ethics and business conduct as stated in the document "ANJ's code of ethics and business conduct" January 1, 2014. The document states that the company upholds the values of integrity, respect for fellow human beings, and the environment as well as continuous improvement. It is also stated that the company builds trust and a good reputation towards and for stakeholders by referring to the principles of transparency, accountability, objectivity and fairness, all of which are the embodiment of the company's code of business conduct.</p> <p>Unit of Certification showed several socializations about sustainability policies related to the RSPO principles, the company's vision and mission as well as the company's values. The policies presented also include a code of ethics policy. Examples of socialization of company policies include:</p> <ul style="list-style-type: none"> • Socialization on 17 September 2022 to 20 BSL 7 division workers • Socialization on September 21, 2022 to 27 workers of division 7 LAB • Socialization on 20 August 2022 to 38 workers in division 6 <p>1.2.2 Unit of Certification has several systems in place to monitor compliance and the implementation of ethical business policies and practices, namely:</p> <ul style="list-style-type: none"> • Through the mechanism of the Whistle Blowing System (WBS). In the system it is stated "if you see, know or experience a violation of business ethics, immediately report it to us". This system guarantees that the identity of the giver of information will be kept confidential. Reports of violations of the code of ethics can be made via email and telephone. • Through internal audits which are conducted regularly every year. <p>Based on the results of interviews with management and document verification, it was found that there were cases of violations of the code of ethics. There was a violation of integrity and code of ethics by the foreman 1 division 12 GST 1 in March 2022. Based on the inspection and the Minutes of Inspection to the contractor, it was found that there was fraud committed by the foreman which materially detrimental to the company. Related to this, the company terminated the employment relationship with the person concerned.</p> <p>The results of interviews with stakeholders such as workers and contractors, obtained information that the company has provided socialization related to the company's ethical policies.</p>	
<p>Status: Comply</p>	
<p>PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS</p>	
<p>2.1 There is compliance with all applicable local, national and ratified international laws and regulations.</p>	
<p>2.1.1 Compliance with Worker Welfare Regulations: The implementation of the minimum wage at PT KAL based on the Decree of the Governor of West Kalimantan Number 896/DISNAKERTRANS/2020 concerning the Sectoral Minimum Wage of Ketapang Regency in 2021 stipulates the wage for the Plantation and Palm Oil Processing Industry Sub-sector, which is Rp. 2,888.000,- which has been enforced since January 1, 2021. The minimum wage for Ketapang Regency in 2022, has a value smaller than the Sectoral Minimum Wage for Ketapang Regency in 2021, which is Rp. 2,876,252.79. Thus, the company is still implementing the Ketapang District Sectoral Minimum Wage in 2021. Company shows Internal Memo No. 002/ANJ/HRCM/IM/2022 dated January 26, 2022 regarding the implementation of minimum wages for non-staff employees. As for PT KAL the minimum wage in 2022 is Rp. 2,888,000</p> <p>Compliance with Environmental Regulation</p>	

- Ketapang Regent Decree Number 466/DPMPTSP-D/2020, dated December 14, 2020, regarding Environmental Permits for Plantation Activities and Palm Oil Processing Factory by PT Kayung Agro Lestari in North Matan Hilir District, Ketapang Regency, land area 16,620 Ha with PKS processing capacity of 90 tons of FFB/Hour, this permit will simultaneously revoke:
- Decree of the Regent of Ketapang Number 577/DPMPTSP-D/2019 dated November 08, 2019, regarding Environmental Feasibility Permits for Plantation Activities and Palm Oil Processing Mills by PT. Kayung Agro Lestari in North Matan Hilir District, Ketapang Regency.
- Decree of the Regent of Ketapang Number 576/DPMPTSP-D/2019 dated November 08, 2019 concerning Environmental Feasibility of Plantation Activities and Palm Oil Processing Mills by PT. Kayung Agro Lestari in North Matan Hilir District, Ketapang Regency
- Decree of the Regent of Ketapang Number 465/DPTMPTS-D/2020 dated December 14, 2020 concerning Environmental Feasibility of Plantation Activities and Palm Oil Processing Mills by PT. Kayung Agro Lestari in North Matan Hilir District, Ketapang Regency. The area is 16,620 Ha with a capacity of 90 tons of FFB/hour.
- Announcement Number 660.1/866/DPMPTSP-D/2020 dated December 14, 20210 regarding the Issuance of Environmental Permit Number 466/DPMPTSP-D/2020, dated December 14, 2020, regarding Environmental Permits for Plantation Activities and Palm Oil Processing Mills by PT Kayung Agro Lestari in North Matan Hilir District, Ketapang Regency
- Unit of Certification has a permit for temporary storage of hazardous waste as stated in the Statement of Fulfillment of PT Kayung Agro Lestari's Commitments issued by the Ketapang Regency Government, Investment and One-Stop Integrated Services Agency number 660.1/181/DPMPTSP-D/2020 which was set on the date of 18 June 2020 a.n Ketapang Regent Head of the Ketapang Regency Investment and One-Stop Integrated Service Office
- Unit of Certification already has a wastewater utilization permit as stated in the Ketapang Regent Decree Number: 399/PERKIMLH-C/2017 concerning Permit for Utilization of Wastewater for Application to Soil for PT Kayung Agro Lestari Oil Palm Plantation covering an area of 326.09 HA which is located in Matan Hilir Utara District, Regency Ketapang on July 25, 2017 and valid for 5 years.
- Unit of Certification has also sent a letter of application for the extension of the waste water utilization permit for application to the ground with letter number 079/GMO/KAL/EM/VII/2022 to the Public Housing Service for Settlement and Environmental Areas of Ketapang Regency and the company has received a follow-up on the application letter. number B/1328/PERKIMLH-E.660.1/VIII/2022 regarding the directives for the use of waste water for application to the ground (Land Application).
- Unit of Certification already has a water use permit as stipulated in the Decree of the Head of the Office of Investment and One Stop Integrated Services of West Kalimantan Province Number 503/07/SDA/DPMPTSP-C.I/2021 concerning the Granting of a Water Resources Concession Permit to PT Kayung Agro Lestari in Ketapang Regency, Province West Kalimantan. The maximum recommended water discharge is 90,000 m3/month.
- From the letter, the Department of Public Housing for Settlement and Environmental Areas of Ketapang Regency has conducted a review at the company PT Kayung Agro Lestari to determine whether the existing permit can be extended or apply for technical approval for the use of wastewater to the ground and is currently in the process of being determined by the Office. People's Housing in the Settlement and Environmental Areas of Ketapang Regency. Unit of Certification has the opportunity to ensure the process related to the status of the permit for the utilization of the wastewater. **OFI**

Compliance with BMP

In best management practices, it is known that plantation and mill management has implemented some compliance with Indonesian laws and regulations. For example, not using the burning method in the land clearing process, reporting peat characteristics to the government, and implementing integrated pest control.

Compliance with Legal Aspect

In term of legal aspect, the CH has shown evidence towards legal aspect, The Certificate Holder has complied with regulations in the field of plantation and land legality, such as HGU (land use title) IUP P (plantation business permit for mill) as well as mandatory reports on annual land use to BPN.

2.1.2

Unit of Certification already has documents related to the list of laws and regulations of PT Kayung Agro Lestari Year 2022 which will come into effect on April 12, 2022, with the following description:

- Company Aspect
- Aspects of Land and Plantation Permits

- Environmental Aspects
- Environmental Documents and Environmental Permits
- Protection and management of the environment
- Thresholds and Quality Standards
- Hazardous Waste Management
- Domestic waste management
- Use of wood
- Administration of timber forest products
- Use of forest area outside HGU
- Forest and Land Fires
- Employment Aspect
- Aspects of taxation
- Occupational Health and Safety Aspects

The last internal audit for regulation compliance was conducted in March 2022 carried out in conjunction with the RSPO Internal audit, where from the results of the RSPO Internal audit found 17 non-conformities (7 Major & 10 Minor).

2.1.3

The location of the stakes is shown in the map of land parcels No. Map 066-14.07-2012, scale 1:35000 for two parcels of land A and B, and the HGB parcels are issued by the National Land Agency of the Republic of Indonesia. The number of stakes is 298 for HGU and 23 stakes for HGB.

Unit of Certification has shown the work instructions for maintaining the BPN stake no. IK-SOP Leg 001 – 001 effective date 1 Jan 2019, it is explained that routine checks are carried out every 6 months.

The results of verification of company documents can show monitoring of HGU stakes, for example

- Monitoring of HGU stakes at GST-1 in February 2022 where all stakes are in good condition
- Monitoring of HGU stakes at GST-2 in April 2022 where all stakes are in good condition
- Stakes at Mitra Estate in June 2022 found 93 stakes
- Monitoring of HGU stakes in SGT-1 in March 2022 where all stakes are in good condition.

Based on video observation of HGU stake No. 105, 102, 103 in SGT-1 and No. 6, 7, 8 in GST 2 it is known that the stakes are in a well-maintained condition and there is no indication of planting oil palm trees outside the HGU.

Status: Comply

2.2

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

2.2.1, 2.2.2, and 2.2.3

Unit of Certification already has a list of contractors including FFB supplier, which are contained in the document stakeholder list. The list of contractors includes all third parties working with PT KAL such as hazardous waste transport contractors, FFB transport contractors, contractors for house construction work and others. The list of stakeholders informs the name of the agency, contact name, field of cooperation, address and contact number. Unit of Certification has shown examples of agreement with contractors and supplier that have contained clauses regarding legal compliance obligations, such as:

- Agreement for Manual maintenance work agreement 012SPKB/07/0822 dated July 16 2022
- Agreement for manual weeding No. 158SPKB-3000080-10-0922 dated August 20, 2022.
- Agreement with FFB supplier No. 1204/COM/KAL/2021 dated December 7, 2021

In the agreements have been explained about:

- Obligation to provide accident insurance and medical treatment
- Obligation to provide PPE for workers
- Obligation to comply with the provisions regarding OHS and the environment
- Obligation to comply with all employment provisions

- Prohibited from employing child labor, trafficked or forced labor

Unit of Certification shows a contractor monitoring document that informs the name of the collaborating contractor, the type of work, the number of contractor workers, the identity of the contractor workers, BPJS contractor workers, wages of contractor workers and others. Examples of compliance with regulations by contractors:

PT Manjau Agro Abadi with a total of 5 workers

- Wages of workers with the initials NS with a wage of Rp. 150,000/day
- BPJS Health No. 0001590112146
- Has provide worker with PPE based on PPE monitoring

Unit of Certification shows progress documents for compliance with regulations by contractors until September 2022, such as fulfilling wages according to the minimum wage, BPJS employment, BPJS Health, workers' work agreements, age requirements, PPE and others. Based on the document, it is known that the contractor has not fulfilled the 100% compliance with the regulations. Related to this, the company shows the target of the fulfillment plan until September 30, 2023. Based on this explanation, the company has the opportunity to ensure the realization of the targets that have been made (OFI).

Status: Comply

2.3

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

2.3.1

The unit of certification can present list of FFB supplier that accepted by mill that divided with direct and indirect supplier , as follows:

Direct Supplier

- PT Sinar Karya Mandiri
- Scheme Smallholders

Indirect supplier / middle man

- CV Cahaya Sejati
- CV Abadi Log Jaya

Related to the traceability of the origin of FFB, the unit of certification can present the requirements of directly sourced FFB as follows the Information on geo-location of FFB origins and Proof of the ownership status or the right/claim to the land by the grower. For example for PT SKM the mill can present maps of PT SKM including forest status and related the proof of land ownership can be shown the Decree from Ministry of Agraria and Land Spatial / Head of National Land Agency no 29/HGU/KEM-ATR/BPN/2015 regarding Granting of Land to Cultivate on behalf of PT Sinar Karya Mandiri for Land in Ketapang Regency, Province of Kalimantan Barat, Business Identification Number B120111041872 dated 17 October 2018 and Taxpayer Registration Number 01.406.565.0-703.000. Especially for partners at the ASA-3 stage this time, all partners consisting of 3 cooperatives have entered the scope of certification.

2.3.2

Unit of Certification has a list of indirect suppliers (middleman), where during the audit there were 2 indirect suppliers who were still actively sending FFB to the company, namely CV Cahaya Sejati and CV Abadi Log Jaya. Unit of Certification can show documentation of FFB source traceability data from CV Cahaya Sejati and CV Abadi Log Jaya including the name of the landowner, area, year of planting, location, legality of land ownership, location, type of land and other supporting information.

As an example of FFB location data from CV Abadi Log Jaya initial EH with code BA0100006 with APL status, the type of SKT legality is located at coordinates X 368430.593 Y 9896164.327.

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

Unit of Certification shows the 5-Years Financial Projection 2022 – 2026 document that informs Unit of Certification financial plans for the next 5 years. The document informs, among others, production projections (FFB, CPO and PK), price projections as well as costs and revenues, briefly presented as follows:

Projection	Unit	2022	2023	2024	2025	2026
<i>FFB Production</i>						
<i>Own Estate</i>	Ton	202,659	226,471	244,695	262,616	263,165
<i>Purchase FFB External</i>	Ton	111,007	102,474	111,965	121,760	126,224
<i>Extraction Rate</i>						
<i>OER Own Estate</i>	%	22.50	23.00	23.00	23.00	23.00
<i>OER External</i>	%	21.40	21.40	21.40	21.40	21.40
<i>KER Own Estate</i>	%	3.50	3.50	3.50	3.50	3.50
<i>KER External</i>	%	3.20	3.40	3.40	3.40	3.40
<i>CPO Production</i>	Ton	69,375	74,004	80,226	86,442	87,520
<i>Kernel Production</i>	Ton	10,678	11,381	12,338	13,296	13,465

3.1.2

Based on the results of the study of the area statement document, it was informed that the oldest planting year was 2010 and up to the company's ASA-3 assessment activity, no plants had entered the replanting age for the next 5 years.

3.1.3

Unit of Certification shows records of management review activities, for example, which was conducted on May 9, 2022, which was attended by 26 participants. The things that are evaluated include: internal audit findings, communication results from external parties, company management system performance, use of fossil fuels, use of fertilizers, use of pesticides, use of renewable energy, company policies.

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

PT Kayung Agro Lestari has new innovation activities for continuous improvement every year from 2021 to 2022. The following are the innovations developed by the certification unit, namely:

- Waste management and monitoring through WWTP pond management, testing the quality of the effluent and reporting it to the Department of Public Housing for the Settlement and Environmental Areas of Ketapang Regency.
- Air quality management and monitoring through road maintenance, air quality testing and reporting to the Public Housing Service for Settlement Areas and the Environment of Ketapang Regency.
- Management and monitoring of groundwater through testing the quality of ground water and reporting it to the Public Housing Service for the Settlement and Environmental Areas of Ketapang Regency.
- Hazardous waste management through Hazardous and Toxic Waste Storage and Hazardous and Toxic Waste management and monitoring.
- Greenhouse Gas (GHG) Management. Implement a zero burning policy, utilization of EFB, shells and fiber as renewable energy, regular engine maintenance, and regular emission quality tests.
- Unit of Certification has managed HCV well and collaborated with BKSDA for the management of the Essential ecosystem, especially in the management of orangutan habitat.
- Innovation on BMP aspects is carried out with the aim of increasing the efficiency and effectiveness of the work carried out. An example is the EPMS (Electronic Plantation Mobile Solution) system for the transportation and delivery of FFB.
- Provide drinking water facilities for workers.
- Have a Sycanus & Barn Owel Captivity
- Unit of Certification already has an action plan for continuous improvement, among others, by the existence of a field review report document regarding the monitoring and supervision of environmental permit recipients, PT Kayung Agro Lestari environmental protection and management permits in North Matan Hilir District, which was carried out on March 17, 2022 by the Environmental Service. Ketapang Regency.

Based on this explanation, it can be concluded that PT Kayung Agro Lestari has met the indicator 3.2.1

3.2.2

Unit of Certification already has an RSPO metric template, from the results of the study the RSPO metric template document is completed based on annual data for the January – December 2021 period including water monitoring data and HCV management and monitoring.

Based on this explanation, it can be concluded that PT Kayung Agro Lestari has met the indicator 3.2.2

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

Unit of Certification has procedures for all activities in Mill and Estate, such as:

- Procedure No. SOP-AGR-03 issue 01 dated August 1, 2013 regarding Land Clearing with Zero Burning.
- Procedure No. SOP-AGR-05 edition 01 dated August 1, 2013 regarding soil and water conservation.
- Procedure No. SOP-AGR-07 dated 01 August 2013 regarding oil palm nurseries
- Procedure No. SOP-AGR-09 (Rev. 04) dated 01 April 2016 regarding planting on mineral lands.
- Procedure No. SOP-AGR-04 dated 01 August 2013 regarding planting on peatlands.
- Procedure No. SOP-AGR-06 dated 01 August 2013 regarding marginal land management.
- procedure no. SOP-AGR-08 dated August 1, 2013 regarding planting nuts.
- Procedure No. SOP-AGR-11 dated August 1, 2013 regarding fertilizers and fertilization.
- Procedure No. SOP-AGR-12 dated August 1, 2013 regarding Immature and LCC fertilization.
- Procedure No. SOP-AGR-13 dated August 1, 2013 regarding principal payments.
- Procedure No. SOP-AGR-14 dated August 1, 2013 regarding the census and identification of principals.
- Procedure No. SOP-AGR-17 dated 01 August 2013 regarding weed control.
- Procedure No. SOP-AGR-20 dated 01 April 2016 regarding integrated pest control.
- Procedure No. SOP-AGR-21 dated August 1, 2013 regarding controlling mice with owls.
- Procedure No. SOP-AGR-24 dated 01 August 2013 regarding controlling rats with Rat Bait.
- Procedure No. SOP-AGR-26 dated August 1, 2013 regarding soil analysis.
- Procedure No. SOP-AGR-27 dated August 1, 2013 regarding termite control.
- Work Instruction No. IK-SOP-AGR-011-01 dated March 1, 2016 regarding compost.
- Work Instruction No. IK-SOP-AGR-011-07 dated 01 March 2016 regarding the application of compost.
- SOP for Pesticides and their Management No. SOP-AGR-18 (1st Edition Revision 0) effective August 1, 2013.
- Document No. ST 01/ ENG-STR June 2011 regarding FFB Reception Station.
- Document No. ST 02/ ENG-STR June 2011 regarding Sterilizer Station.
- Document No. ST 03/ ENG-STR June 2011 regarding Threshing Station.
- Document No. ST 04/ ENG-STR June 2011 regarding Pressing Stations.
- Document No. ST 05/ ENG-STR June 2011 regarding Depericarper Station.
- Document No. ST 06/ ENG-STR June 2011 regarding Kernel Station.
- Document No. ST 07/ ENG-STR June 2011 regarding Clarification Station Part 1.
- Document No. ST 08/ ENG-STR June 2011 regarding Boiler Station.
- Document No. ST 09/ ENG-STR June 2011 regarding Power Stations.
- Document No. ST 10/ ENG-STR June 2011 regarding Water Treatment.
- Document No. ST 11/ ENG-STR June 2011 regarding Boiler Water Management.
- Document No. ST 12/ ENG-STR June 2011 regarding Waste Treatment.
- Document No. ST 13/ ENG-STR June 2011 regarding Grading.
- Document No. ST 14/ ENG-STR June 2011 regarding Palm Oil Shipments.
- Document No. ST 15/ ENG-STR June 2011 regarding Factory Inventory System.
- Document No. ST 16/ ENG-STR June 2011 regarding CPO Stock Sounding Procedure.
- Document No. ST 17/ ENG-STR June 2011 regarding Palm Kernel Stock Procedure.
- Document No. ST 18/ ENG-STR June 2011 regarding Factory Security System.

- Document No. ST 19/ ENG-STR June 2011 concerning Washing of Oil Storage Tanks.

The results of interviews with Mill workers, for example, St. Boiler and Engine Room as well as Estate workers for example harvesting activities, it is known that workers already have an understanding and can briefly explain work procedures in their respective work areas.

3.3.2

The certification unit has a procedure for management review that ensures the consistency of procedures implementation, the companies routinely conduct internal audit activities both agronomic and processing. One of them is contained in the document Standard Operating Procedure Internal Audit System Management No. SOP-SCD-03 dated 27 November 2017. In addition, the work carried out by the contractor is also checked, one of which is when submitting the payment stage.

3.3.3

Unit of Certification shows records of monitoring and follow-up, for example:

- Internal Remote Audit of the RSPO for the 2022 period which was conducted on 7 – 16 March 2022 with 17 non-conformities (7 critical and 10 non-critical).
- The ISPO Internal Remote Audit for the 2022 period, which was conducted on 7 – 16 March 2022, resulted in 13 discrepancies.
- Corrective Action Report Internal Audit RSPO – ISPO 2022 with details of 4 On Progress discrepancies and 15 discrepancies have been fulfilled.
- Internal Audit Report No. 21/GIA-REG/KAL/VIII/2021 year 2021 which evaluates related to overtime, leave and employee permits as well as advances.

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

Unit of Certification already has a social and environmental impact assessment document with the following description:

Social Impact Assessment

SEIA final report document in the area of PT Kayung Agro Lestari Ketapang Regency – West Kalimantan compiled by PT Kayung Agro Lestari with the Faculty of Forestry IPB Bogor in 2013. The following are conclusions and recommendations based on the results of the study:

- The strategic issues recorded in this study are
 - There is a conflict in the community of Kuala Tolak Village regarding compensation for the Derasah land
 - There is land from the Laman Satong village community which is included in the PT KAL permit area but has been compensated by the mining company
 - There is a global land of the Kuala Satong Village community that has not been compensated by PT KAL (already completed)
 - Reduced availability of ground water in Laman Satong Village
 - There are indications of water pollution of the Siduk River
 - Air pollution (dust) in the dry season
 - Etc
- Social/CSR activities that have been carried out by PT Kayung Agro Lestari are infrastructure development activities, education, religion, health, assistance for national holidays, and other temporal activities.
- Positive impacts felt by the community include the availability of job opportunities, assistance in the religious field, assistance in education, assistance in the social sector, easier accessibility, increased land value and growing villages (community welfare).
- The negative impacts felt by the community are an increase in the volume of floods, cloudy river water especially in the rainy season, reduced ground water and air pollution (dust) in the dry season.
- Based on the existing strategic issues, the identified main stakeholders are classified as direct primary stakeholders, namely stakeholders who are at the company's internal level (plantation management) and local level (village government and land-owning communities). socioeconomic and employment.
- Etc

Unit of Certification also has recommendations from the social impact assessment, namely:

- Corporate CSR programs, both at the planning and implementation scale, need to first study and consider the company's financial capabilities.
- CSR programs that have been prepared need to be communicated and synergized with plans for developing social programs for local government levels at both the district and provincial levels so that these programs can support each other.
- Periodic socialization, counseling and communication must be carried out to minimize negative perceptions of the company.

Based on document verification, it is known that the scope of the social impact assessment has covered all villages, farmers, and has involved internal workers. In addition, based on the results of interviews with representatives of the village of Laman Satong, it is known that the social impacts of the existence of companies such as CSR and employment have been covered in the SIA document.

Environmental Aspect

Unit of Certification has obtained the following environmental permits:

- Ketapang Regent Decree Number 577/DPMPSTSP-D-2019 concerning Environmental Permits for Palm Oil Plantation and Processing Mill Activities by PT Kayung Agro Lestari in North Matan Hilir District, Ketapang Regency with a plantation area of 16,620 hectares and a specified PKS processing capacity of 90 tons of FFB/hour on November 08, 2019.
- Ketapang Regent Decree Number 466/DPMPSTSP-D/2020 concerning Environmental Permits for Palm Oil Plantation and Processing Mill Activities by PT Kayung Agro Lestari in Hilir Utara District, Ketapang Regency with a land area of 16,620 Ha and Mill Capacity of 90 Tons FFB/Hour which was set on 14 December 2020.
- Document Addendum Andal and RKL – RPL type C (Construction of Embankments and Reservoirs, Construction of Pump Houses and Facilities, Construction of Access Roads, Maintenance of Canals and Construction of Stopbunds) for Plantation Activities and Oil Palm Processing Factory PT Kayung Agro Lestari) with an area of Plantation Business Permit : 16,620 Ha with Palm Oil Processing Factory; 90 Ton FFB/Hour.

The impacts of activities managed for the operation phase consist of employment and business opportunities, increased community income, decreased surface water quality, potential for land fires, disease patterns, decreased air quality, increased noise, decreased air quality and emissions, decreased surface quality, changes in public attitudes and perceptions, occupational health and safety (K3), potential for inundation and flooding.

Based on the RKL – RPL document for the first semester of 2022, there is a matrix consisting of several components that must be managed and monitored. Based on the results of verification and comparison with the first semester of 2022 RKL-RPL reports, the company has managed and monitored all components requested in the matrix. The results of the review of the RKL-RPL report document also show that the company has prepared a report document in accordance with KepmenLH No.45 of 2005 concerning Guidelines for Writing RKL-RPL Reports. The forms of evaluation carried out by the company include Evaluation of Trends, Critical Levels and Compliance which are discussed for each aspect that is managed. The scope of the study in the document is also in accordance with the scope of all operational activities, namely oil palm plantations covering an area of 16,620 hectares and milling capacity of 90 tons of FFB/hour.

Unit of Certification has also reported to the relevant agencies, the results of interviews with the Ketapang Regency Environmental Service also stated that the company routinely reports every 6 months. Several proofs of receipt of report delivery which are accompanied by the signature and name of the recipient as well as a wet stamp with the following details:

- Report of RKL – RPL Semester I 2022 to the Ministry of Environment and Forestry on 29 July 2022
- Report of RKL – RPL Semester I 2022 to the Department of Public Housing for Settlement and Environmental Areas of Ketapang Regency on July 14, 2022
- Report of RKL – RPL Semester I 2022 to the Environment Agency of West Kalimantan Province on July 14, 2022

Based on this explanation, it can be concluded that PT Kayung Agro Lestari has met the indicator 3.4.1

3.4.2 EIA

Unit of Certification already has an environmental management and monitoring plan document from the matrix of the impact of activities that must be managed such as employment and business opportunities, increasing community income, decreasing surface water quality, potential for land fires, disease patterns, decreasing air quality, increasing noise, decreasing air quality. and emissions, decreased surface quality, changes in public attitudes and perceptions, occupational health and safety (K3), potential for inundation and flooding.

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- Report of RKL – RPL Semester I 2022 to the Environment Agency of West Kalimantan Province on July 14, 2022

SIA

Unit of Certification already has a social management and monitoring document for the period of 2022 with a summary as follows:

- Socialization of premium price for plasma cooperatives held in April 2022
- Stakeholders meeting to be held in September 2022
- Internal meeting with stakeholders held in January – September 2022
- Improving the quality of health for the community to be implemented in August 2022
- Community economic empowerment carried out in the period April 2022 and June 2022
- Improving the quality of community education (community learning classes) by March 2022
- Environmental management program with socialization of area management designated for PT KAL conservation area in February and August 2022
- Increased socialization to the community with a formal meeting held in March 2022
- etc

Unit of Certification also has documentation of activities that have been carried out, including Desa Sehat (Health Services) with blood donation activities on August 16, 2022 – August 25, 2022 which took place at the Nek Doyan Village Health Center and the Laman Satong Village Office with the activity theme "Village Health Services" Desa Laman Satong". This activity involved staff from PT Kayung Agro Lestari, Satong Health Center, the Village Government of Laman Satong and was attended by approximately 200 participants.

Based on this explanation, it can be concluded that PT Kayung Agro Lestari has met the indicator 3.4.2

3.4.3

EIA

Unit of Certification already has an environmental management and monitoring plan document from the matrix of the impact of activities that must be managed such as employment and business opportunities, increasing community income, decreasing surface water quality, potential for land fires, disease patterns, decreasing air quality, increasing noise, decreasing air quality. and emissions, decreased surface quality, changes in public attitudes and perceptions, occupational health and safety (K3), potential for inundation and flooding still comply with regulation and monitoring plan.

Unit of Certification has also reported to the relevant agencies, the results of interviews with the Ketapang Regency Environmental Service also stated that the company routinely reports every 6 months. Several proofs of receipt of report delivery which are accompanied by the signature and name of the recipient as well as a wet stamp with the following details:

- Report of RKL – RPL Semester I 2022 to the Ministry of Environment and Forestry on 29 July 2022
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- Improving the quality of community education (community learning classes) by March 2022
- Environmental management program with socialization of area management designated for PT KAL conservation area in February and August 2022
- Increased socialization to the community with a formal meeting held in March 2022
- etc

Unit of Certification also has documentation of activities that have been carried out, including Healthy Village (Health Services) with blood donation activities on August 16, 2022 – August 25, 2022 which took place at the Nek Doyan Village Health Center and the Laman Satong Village Office with the activity theme "Village Health Services Laman Satong's". This activity involved staff from PT Kayung Agro Lestari, Satong Health Center, the Village Government of Laman Satong and was attended by approximately 200 participants.

Based on this explanation, it can be concluded that PT Kayung Agro Lestari has met the indicator 3.4.3

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1

Unit of Certification already has a human resource management system in accordance with regulation, which is contained in the following documents, among others:

- Recruitment Procedure No. SOP-HRCM-002 dated November 1, 2019 revision 01.
- PT KAL Employment Policy No.2/GMO/KAL/IM/II/2022 dated 16 February 2022. The policy explains that the company does not withhold/ keep employee identity documents.
- Company regulations of 2022-2024 which has ratified based on letter No. 072/TKT-B.560/22. The procedure describes the human resource management system, such as:
 - Recruitment and appointment of workers
 - Promotion
 - Demotion
 - Mutation
 - Working/retirement age limit
 - Work termination
 - And others

3.5.2

Unit of Certification has kept a track record of employees. For employee recruitment, the stages for recruitment are job application letters, CV, copies of identity cards, and supporting documents such as certificates, diplomas, transcripts and others. Unit of Certification shows employee track record documents stored in each unit (factory and estate).

Unit of Certification has shown a record of the implementation of employment procedures, for example:

Recruitment

- Recruitment documentation with the initials MY and JN such as job application letters, results of health checks, ID cards, diplomas, Family card and others. Company has also shown probation agreement for that worker with the probation period of 3 months.

Appointment as permanent worker

- Decree on the appointment of permanent employee No. 002/HR&CM/KAL/SK/IX/2022 dated September 4, 2022 with initial RK (External Affair department). Employee recruitment documentation has been shown such as a job application letter, ID card, medical examination letter, initial assessment results, final assessment results etc.

Promotion

- Promotion letter No. 036/HRO/SM-KAL/VIII/2022 dated August 29, 2022 with initial RL from a maintenance worker to a maintenance foreman
- Promotion letter No. 008/HRO/SM-KAL/II/2021 dated February 27, 2021 with initial HJ from division clerk to estate clerk.

Termination due to violation of rules

A Collective Agreement on Termination of Employment due to a violation. For example, a worker with the initials YU dated March 21, 2022 which has been signed by both parties. Based on the letter of termination of employment, Letter of Agreement to terminate employment no. 034/HR&CM/KAL/III/2022 and other supporting documents, it is known that workers who have been laid off have made serious mistakes. Unit of Certification has also shown a record of the payment of the workers' rights.

The results of interviews with workers and labor union revealed that labor procedures have been implemented by the company in accordance with applicable regulations. They also known that workers have already know about employment procedures such as termination, retirement or promotion. Based on that interview known that there is no discrimination against workers. Unit of Certification has provided employee rights in accordance with company regulations and applicable regulations.

Status: Comply

3.6

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

3.6.1

Unit of Certification shows the Hazard Identification, Assessment and Risk Control documents for all Mill and Estate operational activities which have been reviewed by the latest EHS on 18 July 2022, the document explains including: Name of Job, Type of Activity (Routine, Non Routine and Emergency), Hazard Identification, Hazard Category, Risk, Preliminary Risk Analysis, Evaluation, Risk Control, Risk to the Company, Risk Level, Opportunity, Opportunity Level, Final Risk Assessment.

Based on the results of field visits and interviews with workers, such as harvesting activities in SGT-1 and SGT-2 as well as processing activities at the mill, it is known that workers already have an understanding of the sources of hazards and potential risks in their work area and have worked using appropriate PPE.

3.6.2

Unit of Certification demonstrates the company's OHS program which includes:

- Socialization of SOPs related to OHS
- Equipment Monitoring and Certification
- Environmental monitoring and management plan
- OHS Management System
- Fire Emergency Preparedness
- Job Site Inspection
- Health promotive and preventive (MCU and Health education)
- Reporting
- Hazardous material, hazardous and domestic waste management
- Work Accident and Prevention Program
- Awareness Promotion (making OHS warnings, etc.)

Unit of Certification shows a record of monitoring the effectiveness of the OHS plan, for example:

Medical Check-Up

Based on the results of interviews with Company Doctors and employees, it is known that in 2021 the Special MCU and General MCU have been carried out. The MCU for workers with certain risks in Mill and Estate has been fully implemented but for the General MCU for all workers it has not been fully realized and is still running in September 2022. In addition, it is also conveyed that workers who experience health problems have been followed up for re-examination.

Unit of Certification showed recordings of the implementation of the Special MCU to Spray, Maintenance, Warehouse/Logistics, Mill, Polyclinic, Mechanics, and Fogging/Firefighter teams which took place on 18 – 22 July 2022 as many as 323 workers with examinations including: complete urine, routine hematology, liver function, renal function, audiometry, Thorax and physical

examination. In addition, the company showed General MCU records to 247 workers in September 2022 with types of checks including blood pressure, pulse and SpO2.

Unit of Certification shows records of follow-up to workers who experience health problems, for example, a worker named Agus Pratama regarding SGOP and SGPT has shown documents including:

- Patient Cover Letter Number 045/KLINIK-KAL/IX/2022 made by the Head of the Polyclinic on September 10, 2022.
- Results of Laboratory Examination on 12 September 2022 with results of SGOT and SGPT exceeding the threshold but indications of Non-Reactive HBsAg
- Consul's Response Letter number 046/Klinik-KAL/IX/22 dated September 13, 2022 with the result of being given treatment.

Monitoring of emergency response facilities

- Unit of Certification shows fire extinguisher monitoring documentation which is carried out once a month, for example, as contained in the fire extinguisher Checklist document for September 2022 at housing locations, GMOs, division offices, Mosque Logistics, Mess Polyclinic, CWT and staff housing, 28 units of Powder type fire extinguishers are available weighing 6 kg and in good condition.
- Monitoring the completeness of employee PPE which is carried out once a month, for example, as contained in the document for the completeness of employee PPE for September 2022
- Monitoring of the first aid kit which is carried out every month.

The results of interviews and review of the Powerhouse Station Work Shift schedule show that in one day it is divided into 4 work shifts with the division of Working Hours 07.00 – 17.00 (WIB), 15.00 – 23.00 (WIB), 17.00 – Stop Process and 23.00 – 07.00 (WIB). If referring to the Powerhouse Station Work Shift schedule, it is possible that there is only 1 worker in 1 shift working at the Powerhouse Station, namely at 7.00 – 15.00 (WIB) and at the time of stopping the process – 07.00 (WIB) if the process stops before 7.00 (WIB).

Based on the review of the operator certification list document, it is known that there is 1 worker who has not received certification training/licensing for PLTU and PLTD an. Johan W and the results of the interview with management stated that the employee in question has only worked at the Powerhouse Station for approximately 1 year and is planned to participate in PLTU and PLTD training/certification in 2023.

So that the company has the opportunity for improvement to ensure the realization of personnel license/competency training according to the type of work (OFI).

Status: Comply

3.7

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

3.7.1

Unit of Certification showed the Training Program for each unit in 2022 that cover all aspects of the P&C RSPO. The training also covers parties who need training such as staff, workers, smallholder and contractors. As for sustainability team and HR department are responsible for the development of the training program scheduling and implementation of training. The training program document informs type of training, plan / timetable and attendance. The 2022 training programs such as:

- *Hyperkes* training
- Supervisory foreman training
- First Aid Training
- Mechanical Maintenance Training
- Hazardous waste simulation training and hazardous waste handling
- Firefighter training
- Training *Hirac*
- Harvest training
- Fertilization training
- Training on the use of PPE
- IPM training
- And others.

3.7.2.

Unit of Certification already has training records, such as:

- IPM training on June 21, 2022 attended by 30 workers
- Training of Leaf Sample Unit on March 8, 2022 attended by 5 workers
- Training of Leaf Sample Unit on March 9, 2022 attended by 10 workers
- First aid training on August 9, 2022 attended by 29 participants
- Sustainability policy socialization training on 27 January 2022 attended by 12 workers.
- IPM control training on April 9, 2022 attended by 18 participants
- Fertilization training on February 8, 2022 attended by 39 participants
- etc

The results of interviews with labor union and workers such as warehouse officer, harvesters, spraying workers, mill worker such as grading officer, boiler officer stated that the company had provided training or socialization regarding work procedures for each worker in bahasa and understood by the workers. In addition, the results of interviews with boiler officers, also conveyed that the worker has been given in boiler officer training. As for the training program which involve contractors such as SOP socialization and training related to OHS. From the results of interviews with workers and contractors, known that workers and contractors can explain the training that has been obtained such as work procedures and OHS implementation.

3.7.3

Documents verifications the unit of certification can present the realization of SCC training that carry out 31 August 2021 with the participants are administration officer, weighbridge, laboratorial officers and security. The training topics is awareness of RSPO SCC, traceability and mass balance.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1

SCSS module used in KAL Mill is Mass Balance (MB), because the mill receives FFB certified by RSPO and non-certified RSPO. Source or supplier of FFB received by the mill can be classified into three categories: own estates, smallholder and independent suppliers / third parties. The Mill has been recorded well the separation of FFB and products (CPO and PK) from certified and uncertified sources. The Mill only claims certified products from certified sources.

3.8.2

KAL POM implemented SCCS with mass balance model due to received FFB from RSPO certified area and non-certified SCSS module used in KAL Mill is Mass Balance (MB), because the mill receives FFB certified by RSPO and non-certified RSPO. Source or supplier of FFB received by the mill can be classified into three categories: own estates, smallholder, and independent suppliers / third parties. The Mill has been recorded well the separation of FFB and products (CPO and PK) from certified and uncertified sources. The Mill only claims certified products from certified sources.

3.8.3

Estimated certified product recorded in the last Assessment Report and Certificate and updated in the RSPO Palm Trace. Actual certified produced has been verified during this assessment, and not exceed the estimate. The estimates of certified production for the next license period also have been set, in reasonable amount taking into account the last year's production. The data are shown in the following table:

Product	Estimate Production 11 December 2022 – 10 November 2022 (MT)	Actual Production September 2021 – August 2022 (MT)	Estimate Production next 12 months (MT)
FFB Estate	195,000	208,498.89	220,000
FFB Scheme or associate Smallholders	45,000		
CSPO	51,600	42,961.24	46,200
CSPK	7,800	7,325.71	7,700

3.8.4

Based on documents verification it was known if the mill has been registered and met the requirements of reporting supply chain through the RSPO supply chain managing organization (palm-trace), which describing below:

Member Information	
Member Name	PT Kayung Agro Lestari
Member ID	RSPO_PO1000006366
Member Country	INDONESIA
Member Category	Oil Mill
Core Product	Palm Oil

License Information	
License ID	CB109416
Issued By	PT Mutuagung Lestari
Issued On	06-11-2020
Start Date	11/11/20
End Date	11/10/21
License Status	Active

All transaction has been announced to RSPO IT Platform and confirmed shipped. The Mill has conducted SCCS mechanism such as announcement in Palm Trace of RSPO CSPO and CSPK sold as certified and confirming the shipping announcement, as well as remove of certified stock for products sold as other scheme or as non-certified/conventional as described in indicator 3.8.8 and 3.8.16

3.8.5

KAL POM has a procedure which explain the implementation of entire element on the Mass Balance requirements, such as: SOP Mass Balance (ANJA Group) document no: SOP-SCD-02 rev-4 dated 7 November 2021, prepared by Sustainability Manager and approved by Head of Sustainability, in the SOP describes the purpose, personnel responsible, supply chain form defined, over-projection mechanism, buyer/supplier complaint mechanism and mechanism of updating on palm-trace. the references used still refer to P&C 2018 INANI 2020 and Supply chain Certification System 2020 & Certification System 2020.

The commercial manager is responsible to conduct the removing stock and announcing of shipping if there were the sales of CSPO and CSPK both claim under RSPO/other scheme or under conventional as well as if there were the allocation for credit, and to informs all sales to Sustainability Manager and Mill Manager. The detail of mechanism for updating trading in RSPO Palm-trace refer to document of IK-SOP-SCD 06-01 (work instruction of up-date trading e-trace system).

Mill manager responsible to ensure the documentation of all SCC implementation, made a production and sales calculation in the mass balance system.

Related to the material traceability, it was describing in the SOP of product traceability no.: S SOP-SCD-02 rev-4 dated 7 November 2021, the SOP explained the steps for SCC implementation since from FFB collection point in harvesting block, FFB reception in POM, FFB processing and until CSPO/CSPK dispatch, it was describing the personnel as well involves and their responsibility:

- Harvesting clerk, issued the FFB delivery document which informs volume, origin (block/estate), for the certified source shall be marked with the GHG value (ISCC) and certificate/SC model (for RSPO).
- WB operators, conduct verification the FFB delivered to POM, the certified and non-certified FFB volumes will be separated based on the FFB delivery note, input the volumes to the system and issued the WB ticket. The operator also conducting the verification on CSPO and CSPK sales contract, shipping instruction and delivery order, inputs the volume of product sales based on the contract to the system and issued the CPO/CSPO/PK/CSPK tickets.
- Mill clerk, receiving the report of FFB which delivered to POM (both from certified and non-certified), inputs the volume of FFB receive, CPO produced, PK produced, separate the volume of CPO/PK certified and non-certified based on calculation ratio specified by the RSPO, and sales CSPO/CSPK and CPO/PK in the mass-balance report.

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

Internal audit procedure is imposed in SOP Internal Audit of System management (No SOP-SCD-03) dated 01 October 2018. On the procedure described if internal audit minimum carries out at least one time a year. Due to this current pandemic situation, there are Internal memorandum from COO ANJ Group NO 001/COO/SC/IM/IV/2020 dated 09 April 2020 that mentioned if internal audit System management can be conducted through remotely

Last internal audit carried out in 7- 16 March 2022 by Sustainability compliance department. Based on internal audit there is no nonconformity related record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. All internal audit has been following up by unit of certification prior external audit carry out

3.8.7

The mill has a record amount of FFB tonnage as follows:

Month	FFB (MT)		Total
	RSPO Certified	Non-Certified	
Sep-21	16,871.464	4,505.966	21,377.430
Oct-21	13,813.321	4,695.879	18,509.200
Nov-21	13,097.035	6,136.415	19,233.450
Dec-21	11,443.553	6,284.797	17,728.350
Jan-22	12,580.112	5,449.918	18,030.030
Feb-22	13,214.934	4,895.956	18,110.890
Mar-22	20,876.264	8,103.141	28,979.405
Apr-22	21,205.092	7,479.498	28,684.590
May-22	21,719.511	7,156.249	28,875.760
Jun-22	23,749.784	9,081.156	32,830.940
Jul-22	18,546.009	6,944.361	25,490.370
Aug-22	21,381.813	5,330.987	26,712.800
Total	208,498.892	76,064.323	284,563.215

Estimated certified product recorded in the certificate annex of last surveillance, actual certified produced has been verified during this assessment, that describes in the following table:

Product	Estimate Production 11 December 2022 – 10 November 2022 (MT)	Actual Production September 2021 – August 2022 (MT)
FFB Estate	195,000	208,498.89
FFB Scheme or associate Smallholders	45,000	
CSPO	51,600	42,961.24
CSPK	7,800	7,325.71

Based on the data shown, there is no overproduction.

Mechanism for handling non-conforming oil palm products and/or documents described I the SOP handling of nonconformities, corrective action and preventive action (SOP-SDD-10 rev 01) which aims to determine the analysis system for the occurrence of management system inconsistencies that apply within the company and determine preventive actions and ensure that the actions taken are effective. During audit carry out it was known there is no non- non-conformity in the handling of the product either physically or documents regarding SCCS.

3.8.8

The CSPO and CSPK from the Mill were sold has met the requirements of certified product information. Supporting documents shown were contract agreement, delivery order, delivery ticket, report of loading, weighing minutes, weighing card, and delivery note. 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.

Based on documents verifications, interview with management as well as verification through Palm Trace it was known during period during September 2021 –August 2022 there are 23,800 MT CSPO and 3,851.42 MT CSPK Sold under RSPO Certified.

Documents verification and interview it was known if claim related CSPK products is no longer than 3 months since the product delivered. The unit of certification can present the supporting documents were contract agreement, delivery order, delivery ticket, report of loading, weighing minutes, weighing card, and delivery note. 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. Based on documents verifications the unit of certification can present if the Shipping announcement is announced no longer than three months, as presented in sample below:

1. CSPK

Shipping announcement with transaction id TR-c247bf99-3bfa volume of CSPK 504.45 MT, module of SCCS MB, dated 24 August 2021, the mill can present

- Sales Purchase contract No.030/KAL/PK/VII/2022 dated July 7, 2022 for the sale and purchase of 750,000 kg of PK with the buyer PT Sumber Indah Perkasa / regarding order to deliver CSPK Product (RSPO MB Certificate MUTU-RSPO/137) to PT Sumber Indah Perkasa.
- Delivery Order 030/KAL/VII/2022 dated July 13, 2022 from PT KAL to CV Abadi Loc Jaya for delivery of CSPK to Buyer On behalf of PT Sumber Indah Prakasa
- Sample of CSPK collection and delivery by CV Abadi Loc Jaya on August 23, 2022 as many as 9,160 Kg with ticket number No.00355584.
- Minutes of Kernel Dispatch to PT Sumber Indah Perkasa on 02 - 04 August 2022 in accordance with contract No.030/KAL/PK/VII/2022 (RSPO MB Certificate MUTU-RSPO/137) covering 500,450 MT

2. CSPO

Shipping announcement with transaction id TR-9f99715a-f79e volume of CSPO 2,200 MT, module of SCCS MB, dated 31 August 2022, the mill can present

- Sales Purchase contract No.033/KAL/CPO/VII/2022 dated 7 July 2022 for the sale and purchase of 2,200,000 kg of CSPO with the buyer PT Wilmar Nabati Indonesia / regarding order to deliver CSPO Product (RSPO MB Certificate MUTU-RSPO/137) to PT Wilmar Nabati Indonesia.
- Delivery Order Letter 033/KAL/VIII/2022 dated 8 August 2022 from PT KAL to CV Abadi Loc Jaya for delivery of CSPO to Buyer On behalf of PT Wilmar Nabati Indonesia.
- Sample of CSPO collection and delivery by CV Abadi Loc Jaya on 27 August 2022 as many as 7,250 kg with ticket number No.1332000167.
- Minutes of Kernel Dispatch to PT Wilmar Nabati Indonesia on 22-27 August 2022 in accordance with contract No.033/KAL/CPO/VII/2022 dated 7 July 2022 (RSPO MB Certificate MUTU-RSPO/137) covering 2,200 MT.

3.8.9

PT KAL has imposed provisions that must be applied by contractors as contained in procedure of SCCS which has been socialized on 26 December 2021, these provisions include:

- CB has the right of access to the contractors to verify the implementation of RSPO SCCS.
- The contractors must be given socialization about SCCS at least once a year

PT KAL is currently holding a third party for the transportation of its products; a contract can be shown for PK and CPO transportation:

- PK transportation agreement no. 015/PK/SC/KAL/2021 with CV Abadiloc Jaya; dated 26 December 2021 address at Ketapang, West Kalimantan. Valid until 31 December 2022.
- CPO transportation work agreement No. 014/CPO/SC/KAL/2021 with CV Abadiloc Jaya; dated 26 December 2021, address at Ketapang, West Kalimantan. Valid until 31 December 2022.

Regarding contractor control, it is also explained that the second party has no right to transfer work to other third parties without the prior approval of the first party.

3.8.10

Based on documents verifications interview with management obtained information if there are one (1) contractor that used for physical handling of RSPO certified oil palm product namely CV Abadiloc Jaya with address in Jalan MT Haryono No 122, Ketapang Kalimantan Barat.

3.8.11

There is no new contractors since Previous assessment

3.8.12

PT KAL have maintained accurate, complete and up-to-date for the FFB receives, process and CPO & PK production from its supply bases. The record keeping saves in "Mass Balance Report" for example periods September 2021 – August 2022. Within this record, the certificate holders maintain the FFB's sources based on monthly bases.

CPO production and Dispatch for PT KAL

Period	CPO production (Kg)		Total	Cert CPO Dispatch (Kg)		Total
	Cert	Non-Cert		RSPO	Non-Cert	
opening stock	2,387,615	-	2,387,615	-	-	-
Sep-21	3,650,251	929,047	4,579,298	-	6,000,000	6,000,000
Oct-21	3,027,992	937,935	3,965,927	-	3,000,000	3,000,000
Nov-21	2,722,038	1,289,389	4,011,427	1,787,020	3,000,000	4,787,020
Dec-21	2,285,478	1,286,959	3,572,437	1,212,980	3,000,000	4,212,980
Jan-22	2,625,838	1,117,868	3,743,706	3,000,000	-	3,000,000
Feb-22	2,749,900	1,004,065	3,753,965	-	3,000,000	3,000,000
Mar-22	4,358,269	1,594,102	5,952,371	5,600,000	-	5,600,000
Apr-22	4,432,953	1,556,730	5,989,683	3,000,000	3,000,000	6,000,000
May-22	4,479,059	1,466,422	5,945,481	4,000,000	1,500,000	5,500,000
Jun-22	4,668,098	1,858,242	6,526,340	-	3,000,000	3,000,000
Jul-22	3,586,608	1,422,010	5,008,618	-	5,500,000	5,500,000
Aug-22	4,374,752	1,091,323	5,466,075	-	5,822,850	5,822,850
Closing stock Sept 2022			5,471,424			
Total	45,384,851	15,554,092	60,902,943	18,600,000	36,822,850	55,422,850

PK production and Dispatch for PT KAL

Period	PK production (kg)		Total	Cert PK Dispatch (kg)		Total
	Cert	Non-Cert		RSPO	Non-Cert	
opening stock	393,455		393,455			
Sep-21	598,208	159,605	757,814	900,000	-	900,000
Oct-21	444,766	147,322	592,087	500,000	200,000	700,000
Nov-21	441,054	212,888	653,942	300,000	443,230	743,230
Dec-21	371,457	202,424	573,880		356,770	356,770
Jan-22	421,761	164,084	585,845	500,000	250,000	750,000
Feb-22	407,095	147,077	554,172	250,000	250,000	500,000
Mar-22	744,501	234,692	979,193	350,000	500,000	850,000
Apr-22	713,173	229,507	942,680	750,000	17,640	767,640
May-22	735,498	216,898	952,396	750,000	232,360	982,360
Jun-22	783,928	273,601	1,057,530	750,000	550,000	1,300,000
Jul-22	568,433	208,973	777,407		450,000	450,000

Aug-22	702,378	160,478	862,857		1,050,000	1,050,000
Closing stock			333,258			
Sept 2022						
Total	7,325,707	2,357,549	9,683,258	5,050,000	4,300,000	9,350,000

3.8.13

The conversion rate of production of CPO (OER) and PK (KER) were based on actual daily, monthly, and yearly production, its confirmed based on interview with mill management as well as field observation.

3.8.14

The conversion rate of production of CPO (OER) and PK (KER) were based on actual daily, monthly, and yearly production, its confirmed based on interview with mill management as well as field observation.

3.8.15

KAL POM implemented SCCS with mass balance model due to received FFB from RSPO certified area and non-certified area

3.8.16

Based on documents verifications, interview with management as well as verification through Palm Trace it was known during period during October 2020 – September 2021 there are 3000 MT CSPO and 5,560.73 MT CSPK Sold under RSPO Certified.

Documents verification and interview during remote audit it was known if claim related CSPK products is no longer than 3 months since the product delivered. The unit of certification can present the supporting documents were contract agreement, delivery order, delivery ticket, report of loading, weighing minutes, weighing card, and delivery note. 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. Based on documents verifications the unit of certification can present if the Shipping announcement is announced no longer than three months, as presented in sample below:

1. CSPK

Shipping announcement with transaction id TR-c247bf99-3bfa volume of CSPK 504.45 MT, module of SCCS MB, dated 24 August 2021, the mill can present

- Sales Purchase contract No.030/KAL/PK/VII/2022 dated July 7, 2022 for the sale and purchase of 750,000 kg of PK with the buyer PT Sumber Indah Perkasa / regarding order to deliver CSPK Product (RSPO MB Certificate MUTU-RSPO/137) to PT Sumber Indah Perkasa.
- Delivery Order 030/KAL/VII/2022 dated July 13, 2022 from PT KAL to CV Abadi Loc Jaya for delivery of CSPK to Buyer On behalf of PT Sumber Indah Prakasa
- Sample of CSPK collection and delivery by CV Abadi Loc Jaya on August 23, 2022 as many as 9,160 Kg with ticket number No.00355584.
- Minutes of Kernel Dispatch to PT Sumber Indah Perkasa on 02 - 04 August 2022 in accordance with contract No.030/KAL/PK/VII/2022 (RSPO MB Certificate MUTU-RSPO/137) covering 500,450 MT

2. CSPO

Shipping announcement with transaction id TR-9f99715a-f79e volume of CSPO 2,200 MT, module of SCCS MB, dated 31 August 2022, the mill can present

- Sales Purchase contract No.033/KAL/CPO/VII/2022 dated 7 July 2022 for the sale and purchase of 2,200,000 kg of CSPO with the buyer PT Wilmar Nabati Indonesia / regarding order to deliver CSPO Product (RSPO MB Certificate MUTU-RSPO/137) to PT Wilmar Nabati Indonesia
- Delivery Order Letter 033/KAL/VIII/2022 dated 8 August 2022 from PT KAL to CV Abadi Loc Jaya for delivery of CSPO to Buyer On behalf of PT Wilmar Nabati Indonesia
- Sample of CSPO collection and delivery by CV Abadi Loc Jaya on 27 August 2022 as many as 7,250 kg with ticket number No.1332000167.
- Minutes of Kernel Dispatch to PT Wilmar Nabati Indonesia on 22-27 August 2022 in accordance with contract No.033/KAL/CPO/VII/2022 dated 7 July 2022 (RSPO MB Certificate MUTU-RSPO/137) covering 2,200 MT

For CSPO and CSPK sold as conventional or other scheme during this period has been removed from certified stock (allocation to credit) . The unit of certification can present removing allocated product or credit allocation from palm trace, as follows ST-TR-2a0d0ca1-ee29 dated 25-02-202 for CPO Product MB transaction Credit Allocation with volume 5,000.

3.8.17

The products are claims as mass balance. The Mill does not use RSPO trademark on product or off product.

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

The Company has a Policy of Respect for Human Rights which has been in effect since August 4, 2016 and has been approved by the President Director. In the policy, it is stated that the unit of certification is committed to respecting and protecting human rights within the area of the unit of certification. In the human rights policy, it is also explained that the unit of certification does not tolerate retaliation against someone who discloses violations or allegations with good intentions.

Unit of Certification showed several socializations about sustainability policies related to the principles of RSPO. The sustainability policies that socialized include human right policies. Examples of socialization of policies as follows:

- Socialization on 17 September 2022 attended by 20 workers
- Socialization on September 21, 2022 attended by 27 workers
- Socialization on 20 August 2022 attended by 38 workers in division 6
- Socialization on March 29, 2022 attended by 56 workers in division 5

Unit of Certification also shows documentation of socialization of third party sustainability and compliance policies, such as the socialization on September 13, 2022 was attended by 20 participants consisting of representatives of management, contractors and the manpower office.

Based on interviews with employees, FFB suppliers and contractors, it can be concluded that they understand human rights policies.

4.1.2

Based on the results of interviews with management, interviews with stakeholders such as village representatives, representatives of workers and related agencies, it was found that the certification unit did not initiate acts of violence or any form of intimidation in its operations.

Based on field visit also known that the company also does not use security forces for extra-judicial acts of interference (nuisance) and intimidation.

Status: Comply

4.2

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

4.2.1;4.2.2

Unit of Certification already has a mechanism for submitting complaints to both internal and external parties as outlined in several SOPs as follows:

- SOP for communication and providing information with document number SOP-Leg-02 with a date of 1 September 2015. Based on the SOP, it has been explained that communication and information sharing are divided into 2:
 - Internal communication and information sharing
 - External communication and information sharing
 The SOP also regulates the guarantee of the confidentiality of the reporter and disclosure of disgrace (whistleblower).
- Internal Memo No. 034/GMO/KAL/IM/IX/2016 dated September 8, 2016. Based on this mechanism, it is explained that complaints can be submitted to the direct supervisor or higher-level supervisor or to the HRD division. Settlement of employee

complaints can be done no later than 3 working days after the employee submits his complaint to his immediate supervisor or HRD.

- External Stakeholder Complaint Management SOP No. SOP-CID-03 dated November 1, 2020. In the SOP it is explained that the response process to complaints is carried out a maximum of 14 working days from the time the complaint is received and recorded in the Complaint Form.

The results of interviews with management, obtained information that if there are complaints which resolution has not been found together, then the complainant can bring the compliance to the RSPO Complaints System. In terms of ensuring the system is understood by affected parties, including those who cannot read and write, the company conveys information verbally (in person) or through its representatives (who can read and write).

The results of interviews with workers and labor union known that workers understand the grievance mechanism. Complaints can also be submitted to labor union. The results of interviews with contractors and head of village around indicated that the village and contractors had understood the grievance mechanism.

4.2.3

The Company has SOP for External Stakeholder Complaints Management No. SOP-CID-03 dated November 1, 2020. In the SOP it is explained that the response process to complaints is carried out a maximum of 14 working days from the time the complaint is received and recorded in the Complaint Form. The document also explains that the company will inform the complainant of the response through a meeting represented by CID/Government Relations.

Unit of Certification already has documentation of complaints, for example:

- Employee complaint dated March 12, 2022 regarding the installation of lighting in residential areas and has been responded to by the company on March 12, 2022
- Employee complaint dated April 15, 2022 regarding employee control (curfew) and has been responded to on April 15, 2022.
- Complaints from the media (internet) regarding employee layoffs. The settlement documentation has been shown, such as:
 - Incident Report No. 17/LK/SEC-KAL/X/2020 dated October 30, 2020 related worker mistake
 - Decree No. 025/KAL/HRSS/SK-PHK/11/20 dated November 19, 2020 regarding Termination of Employment
 - Minutes of bipartite negotiations on November 20, 2020 regarding violations of the company's noble values and code of ethics
 - Minutes of mediation between PT KAL and worker with initial EP on 18 December 2020
 - Letter of mutual agreement dated December 23, 2020 regarding the termination of the employment relationship with worker with initial EP. The letter was signed by both parties and acknowledged by the industrial relations mediator.

4.2.4

The Company has SOP for External Stakeholder Complaints Management No. SOP-CID-03 dated November 1, 2020. In the SOP it is explained that the response process to complaints is carried out a maximum of 14 working days from the time the complaint is received and recorded in the Complaint Form. The document also explains that the company will inform the complainant of the response through a meeting represented by CID/Government Relations and the complainant can appoint a party who will be the mediator at the meeting.

The results of interviews with workers and labor union known that workers understand the grievance mechanism. Complaints can also be submitted to labor union. The results of interviews with contractors and head of village around indicated that the village and contractors had understood the grievance mechanism.

Status: Comply

4.3

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

4.3.1

Unit of Certification has carried out community development around the plantation as shown in the Donation Brief for 2021 & 2022. The following are examples of development around the plantation that the company has implemented:

- Public elementary school construction assistance
- *KTPA* Empowerment Program
- Construction of *KTPA* facilities and infrastructure in 3 surrounding villages

- Patrol for the Prevention and Extinguishing of Forest and Land Fires
- Development of Agroforestry Tourism
- Development of local *trigona* honey products.

Based on the results of interviews with Laman Satong Village, Kuala Satong Village and Kuala Tolak Village, it is known that the CSR assistance provided by the company is considered quite good by the village community. Consultations and interviews are often carried out in determining CSR so that it does not overlap with the Village program. In addition, there are many people in the village of Laman Satong who work for the Company.

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

Previously in ASA-2, the scope of certification was 13,519.79 Ha consisting of 11,080.99 Ha of own estate and 2438.80 Ha of independent smallholders (Koperasi Laman Mayan Sentosa & Koperasi Bina Satong Lestari). In this assessment (ASA-3) there is an additional area of 385.27 Ha in Mitra Estate under the Lestari Bina Abadi Cooperative (297.99 ha) & an additional area from the Koperasi Laman Mayan Sentosa (87.28 Ha)). Based on the explanation above, the total scope of certification is 13,905.06 Ha.

The unit of certification can present the document of land legality as follows:

1. **PT KAL:**

1. **Land Use Title (HGU)**, the total area of 10,920.36 ha, based on Decree No. 33/HGU/BPN.RI/2014, dated February 4, 2014 in Kuala Satong Village, Kuala Tolak Village, Laman Satong Village, consisting of 2 certificates as follows:
 - Certificate No. 101 dated 30 April 2014, area of 9,070.40 Ha, valid until 29 April 2049.
 - Certificate No. 102 dated 30 April 2014, area of 1,849.96 Ha, valid until 29 April 2049.
2. **Buildings Use Title (HGB)** for mill, offices, housing and other facilities, based on National Land Agency (BPN) decree No.: 1/HGB/KEM-ATR/BPN/2016 on the provision of building rights on behalf of PT Kayung Agro Lestari in Laman Satong Village, Sub-district Matan Hilir Utara, Ketapang Regency, West Kalimantan, covering an area of 160.63 ha, valid for 30 years, issued on January 19, 2016. Certificate of HGB No. 01, NIB. 14.07.03.03.00183, issued February 5, 2016 valid until January 19, 2046.
3. **Business Permit**, Decree of Regent Ketapang No. 338 / Disbun-D/2015 in term of Plantation Business Permit on behalf of PT KAL which is located in the Laman Satong Village, Kuala Satong Village and Kuala Tolak Village, Sub-district Matan Hilir Utara, Ketapang Regency, West Kalimantan, for the plantations covering an area of **16,620 ha** and for the processing unit with a capacity of **85 tons/hour**.

2. **Scheme Smallholders (Laman Mayan Sentosa – fully managed under Mitra Estate) – 2,079.25 Ha:**

Scheme smallholders of PT KAL (Koperasi Laman mayang Sejahtera) has obtained land use tittle covering 1,567.97 Ha, consisting of 2 certificate as follows:

- Certificate No. 149 dated 03 Mach 2017 covering an area of 1561.62 Ha valid until 14 February 2052
- Certificate No. 150 dated 03 Mach 2017 covering an area of 6 Ha valid until 14 February 2052

For the rest of the area covering 424.35 Ha, land legality documents are land register certificates (SKT) from the Village head. For those areas total, there is 213 land register certificate. Land register certificate issued by the village head and it's known by subdistrict head, for example:

- Land Register Certificate area No 593.3/90/LS/PEM/2015 dated 28 May 2015 issued by village head Laman Satong and known by Subdistrict head Matan Hilir Utara, for area covering 2 Ha
- Land Register Certificate area No 593.3/90/LS/PEM/2015 dated 28 May 2015 issued by village head Laman Satong and known by Subdistrict head Matan Hilir Utara, for area covering 2 Ha

In the ASA-3 stage, there is an additional scope of members of the Koperasi Laman Mayan Sentosa covering an area of 87.28 Ha land legality documents are land register certificates (SKT) from the Village head. For those areas total, there is 44 land register certificates

3. **Scheme Smallholders (Bina Satong Lestari Cooperative- fully managed under Mitra Estate) – 446.83 Ha:**

Scheme smallholders of PT KAL (Bina Satong Lestari Cooperative) has obtained land use tittle covering **446.83 Ha**, consisting of 3 certificates as follows:

- Certificate No. 145 dated 01 November 2016 covering an area of 145.87 Ha valid until 15 August 2051
- Certificate No. 146 dated 01 November 2016 covering an area of 113.52 Ha valid until 15 August 2051

- Certificate No. 147 dated 01 November 2016 covering an area of 187.44 Ha valid until 15 August 2051

4. Scheme Smallholders (Lestari Abadi Bersama Cooperative – full manage under Mitra Estate) – 297.99 Ha.

The legality of the land owned is the Statement of Physical Control of the Land Sector a.n Aspar H. Ali as the general chairman of the Lestari Abadi Bersama cooperative dated April 1, 2021. Which is known to the village of Kuala Tolak.

4.4.2, 4.4.3, 4.4.4, 4.4.5, 4.4.6

There were no customary rights, and traditional rights within the company's HGU, the entire land use title area was originally converted from the forest area to become the land allocated for other purpose in 2009.

There was an area of community cultivation in the area proposed by the HGU at the time, the land acquisition process had been carried out by the company and completed in 2015. At the beginning of the plantation development, the Company had been socializing to the surrounding community related to the plan to development of oil palm plantations, for example the socialization in Matan Hilir Utara and Sukadana, 19 September 2006. Based on interview with representatives of Village community leaders, cooperative and previous land owners obtained information if that the entire operational area of the company had been compensated. The compensation process involved all community witnessed also by the Village Head, Subdistrict head and etc.

The compensation process is based on the basis of consultation and negotiations are transparent and meet the demands for social justice. Unit of Certification has been shown evidence of land compensation to related parties. The sample of process land compensation present to landowner was sighted, The copy was made in Bahasa and known by all relevant parties. Although the legal status acquired land is located within the Land Use Title area of the company, which is in the law the company is controlled legally. These processes involved the landowner and approved by the head of the village and head of the sub-district. The documented process of land compensation was signed by a related party, filed in each estate

Unit of Certification has a procedure for land compensation as outlined in the Land Acquisition and Growth Procedure No. 021 / HR & GA / CP / Land Acquisition / 06-09, 1 June 2009. The procedure shows that in the process of compensating for land, it must go through the approval of the relevant land owner and involve relevant parties according to the type of land ownership. Unit of Certification has well documented the process of implementing land loss compensation, for example Letter of Agreement 3 of the Village Head in 2012.

Status: Comply

4.5

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

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

There is no change / new development in the area of PT Kayung Agro Lestari until this assessment.

There were no customary rights, and traditional rights within the company's HGU, the entire land use title area was originally converted from the forest area to become the land allocated for other purpose in 2009.

The compensation process is based on the basis of consultation and negotiations are transparent and meet the demands for social justice. Unit of Certification has been shown evidence of land compensation to related parties. The sample of process land compensation present to landowner was sighted, the copy was made in Bahasa and known by all relevant parties. Although the legal status acquired land is located within the Land Use Title area of the company, which is in the law the company is controlled legally. These processes involved the landowner and approved by the head of the village and head of the sub-district. The documented process of land compensation was signed by a related party, filed in each estate.

Status: Comply

4.6

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

4.6.1, 4.6.2, 4.6.3, 4.6.4

Unit of Certification has a procedure for land compensation as outlined in the Land Acquisition and Growth Procedure No. 021 / HR & GA / CP / Land Acquisition / 06-09, 1 June 2009. The procedure shows that in the process of compensating for land, it must

go through the approval of the relevant landowner and involve relevant parties according to the type of land ownership. Unit of Certification has well documented the process of implementing land loss compensation, for example Letter of Agreement 3 of the Village Head in 2012.

The compensation process is based on the basis of consultation and negotiations are transparent and meet the demands for social justice. Unit of Certification has been shown evidence of land compensation to related parties. The sample of process land compensation present to landowner was sighted, the copy was made in Bahasa and known by all relevant parties. Although the legal status acquired land is located within the Land Use Title area of the company, which is in the law the company is controlled legally. These processes involved the landowner and approved by the head of the village and head of the sub-district. The documented process of land compensation was signed by a related party, filed in each estate

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, 4.7.3

There is no change / new development in the area of PT Kayung Agro Lestari until this assessment.

There were no customary rights, and traditional rights within the company's HGU, the entire land use title area was originally converted from the forest area to become the land allocated for other purpose in 2009.

There was an area of community cultivation in the area proposed by the HGU at the time, the land acquisition process had been carried out by the company and completed in 2015. At the beginning of the plantation development, the Company had been socializing to the surrounding community related to the plan to development of oil palm plantations, for example the socialization in Matan Hilir Utara and Sukadana, 19 September 2006. Based on interview with representatives of Village community leaders, cooperative and previous land owners obtained information if that the entire operational area of the company had been compensated. The compensation process involved all community witnessed also by the Village Head, Subdistrict head and etc.

Unit of Certification has a procedure for land compensation as outlined in the Land Acquisition and Growth Procedure No. 021 / HR & GA / CP / Land Acquisition / 06-09, 1 June 2009. The procedure shows that in the process of compensating for land, it must go through the approval of the relevant landowner and involve relevant parties according to the type of land ownership.

Unit of Certification has well documented the process of implementing land loss compensation, for example Letter of Agreement 3 of the Village Head in 2012.

Based on verification on the compensation documents, shows that the landowner has been represented through an institution or representative of their choice, the recipient of the compensation and the one who signed the agreement and statement was the landowner himself witnessed by Sub Village Head, Village Head, and Sub District Head. This is consistent with the results of interviews with community representatives / ex-landowners during public consultations.

Status: Comply

4.8

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

4.8.1, 4.8.2, 4.8.3, 4.8.4

There is no an open land dispute within the company' and LMS Cooperative' HGU area. Unit of Certification has a Land Compensation Mechanism and Land Conflict Resolution Mechanism that reflects the FPIC process in the process of acquisition and resolution of land conflicts.

The results of interviews with representatives including previous landowner obtained information if that the entire operational area of the company had been compensated. The compensation process involved all community witnessed also by the Village Head, Customary leader, Sub district. Until the audit was carried out, there was no written complaint from the community regarding the land dispute.

Although PT KAL has gained land rights legally but there are still many people using and cultivating in permit Area. Unit of Certification has had the Area Statement map who described various land use in permit Area, included occupation area width. That's area managed by community are palm oil, rubber, or horticulture. In other information, there is no significant land conflict in PT KAL. Based on interview is with occupants in F13 Division 8 obtained information that they had managed the area before PT KAL was established. Occupants explained that so far there have been no problems and both parties respect each other. The results of the interview also obtained information that they were not willing to be compensated because the area belonged to them and as a source of income for their families. The results of the field visit also revealed that the company had made a ditch as the boundary of the company's operations with the area controlled by the community

In conflict resolution SOP has been explained that any problems and conflicts will be settled by mediation and deliberation, and if no agreement is reached it will be resolved by legal means (court or police). Unit of Certification does not use mercenaries in maintaining peace and order and based on interviews with the villages mentioned there has been no act of confrontation and intimidation by the company.

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1

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

5.1.1; 5.1.2; 5.1.3

Plasma Smallholder FFB

The Company has minutes of the meeting to determine the "K" index and the Price of FFB for Oil Palm Production by West Kalimantan Planters for the first period of August 2022, which are determined based on the FFB Pricing Team for Palm Oil Production by West Kalimantan Planters for the First Period of August 2022 on Monday 15 August 2022. The FFB pricing team is carried out by the Regional Government of West Kalimantan Province.

FFB Third Party

Unit of Certification already has a mechanism for submitting FFB prices as stated in the Internal Memo dated March 25, 2021 which explains, among other things, that in order to implement the principles of transparency and accountability in terms of purchasing FFB from suppliers/third parties at Mill PT Kayung Agro Lestari, FFB price information is submitted via email. Short Message Service (SMS) and Price boards on the tumble at Mill.

Unit of Certification and third parties have regulated the purchase price of FFB, for example as stated in the Sale and Purchase Agreement of Fresh Fruit Bunches No. 1205/COM/KAL/2021 between PT Kayung Agro Lestari and CV Cahaya Sejati which explains, among other things, that the parties agree that the second party's FFB purchase price will refer to the FFB purchase price set or informed based on written notification via email, Short Message Service (SMS) and a price board on the tumble in the PKS. Notification of the determination or change in the FFB price will be delivered by the first party to the second party no later than 1 day before the delivery of FFB by the second party during the term of the agreement.

Companies can also show FFB payment information through electronic messages sent to suppliers, for example, FFB information for suppliers on behalf of CV Cahaya Sejati on April 29, 2022 and April 23, 2022.

Premium Price Pricing

Unit of Certification has determined the premium price value as stated in the Internal Memo dated February 3, 2022, for example, in the achievement of the Koperasi Laman Mayan Sentosa which obtained an RSPO certificate and as a form of PT Kayung Agro Lestari's commitment to provide welfare to members of the Koperasi Laman Mayan Sentosa, a premium price was given. which is obtained each from the sale of Crude Palm Oil (CPO) and/or Palm Kernel PK products that are RSPO certified in the period December 2020 to December 2021 and the calculation method is carried out based on the determination of OER and KER which is determined from the sales proceeds.

Unit of Certification can also show proof of payment on February 22, 2022 for the Koperasi Laman Mayan Sentosa.

5.1.4

Unit of Certification already has a cooperation agreement document, for example, between PT Kayung Agro Lestari and the Bina Satong Lestari Plantation Cooperative with the number 010/KAL/SM/mp/VII/2014 and Number 01/BSL/PK/VIII/2014. The cooperation agreement relates to the cooperation agreement for the development and management of oil palm plantations with a partnership pattern. The summary of the cooperation agreement includes:

- The scope of cooperation includes land acquisition, land clearing, nurseries, legume planting, oil palm planting, plant maintenance, etc.
- Supporting documents consisting of the third party's deed of establishment and its ratification as well as all amendments to the articles of association and their approval or reporting
- The term of the agreement is 30 (thirty) years from the date of signing the agreement of the parties
- The price of the product refers to and is guided by the provisions in force in the Province of West Kalimantan
- Rights and obligations of the first and second parties.

Based on this explanation, it can be seen that the cooperation agreement is in accordance with the provisions and laws, has a period of time, has been approved by both parties and is known by the Regent of Ketapang.

5.1.5

Unit of Certification already has a cooperation agreement document, for example, between PT Kayung Agro Lestari and the Bina Satong Lestari Plantation Cooperative with the number 010/KAL/SM/mp/VII/2014 and Number 01/BSL/PK/VIII/2014. The cooperation agreement relates to the cooperation agreement for the development and management of oil palm plantations with a partnership pattern. The summary of the cooperation agreement includes:

- The scope of cooperation includes land acquisition, land clearing, nurseries, legume planting, oil palm planting, plant maintenance, etc
- Supporting documents consisting of the third party's deed of establishment and its ratification as well as all amendments to the articles of association and their approval or reporting
- The term of the agreement is 30 (thirty) years from the date of signing the agreement of the parties
- The price of the product refers to and is guided by the provisions in force in the Province of West Kalimantan
- Rights and obligations of the first and second parties
- etc

Based on this explanation, the cooperation agreement is in accordance with the provisions and laws, has a period of time, has been approved by both parties and is known by the Regent of Ketapang.

5.1.6

From the results of the document review, the company has examples of proof of FFB payments, including to third parties, namely:

- Proof of FFB payment transfer on 22 September 2022 to Abadi Loc Jaya via Bank Mandiri transfer
- Proof of FFB payment transfer on 22 September 2022 to Sudirman via Bank Mandiri transfer

5.1.7

Unit of Certification can show a certificate of inspection/verification of electronic bridge scales from the Office of Cooperatives, SMEs, Trade and Industry, Legal Metrology Technical Service Unit Type A, Ketapang Regency for 2 weighbridges, namely:

- Certificate of Test Result Number 107/SKHP/MET-THE/XI/2021 MK Cells Brand; Type MK E-1005; Serial No. MK 2018880780 with a maximum capacity of 50,000 kg which was tested on November 4, 2021 and with the results ratified based on the Law of the Republic of Indonesia Number 2 of 1981 concerning Legal Metrology and recalibrated on November 4, 2022
- Certificate of Testing Result Number 108/SKHP/MET-THE/XI/2021 MK Cells Brand; Type MK E-1005; Serial No. MK 2018880780 with a maximum capacity of 50,000 kg which was tested on November 4, 2021 and with the results ratified based on the Law of the Republic of Indonesia Number 2 of 1981 concerning Legal Metrology and recalibrated on November 4, 2022

5.1.8

Unit of Certification has supported Mandiri with RSPO certification, among others, the company carried out a socialization of sustainable palm oil which was held on August 4, 2022. The socialization is described as follows:

- Whereas outside FFB suppliers expressed their appreciation to the management of PT Kayung Agro Lestari for their socialization of sustainable palm oil and oil palm cultivation techniques to independent smallholders, for example in Kuala Tolak Village.

- The application of good plantation techniques, among others, by using superior seeds for oil palm cultivation, oil palm nursery stages, fertilization and the effects and symptoms of nutrient deficiency in oil palm, methods of controlling water in tidal land and integrated pest control.
- Unit of Certification explained about the management of the HCV area, the conservation of orangutans and the call to protect the environment so that the species of animals and plants can remain sustainable.
- Unit of Certification provides an explanation regarding the legality of the land, the type of forest area status and areas that are not allowed to be planted with oil palm.

5.1.9

Unit of Certification has a complaint mechanism contained in the SOP document for managing external stakeholder complaints which has been in effect since November 1, 2020, explaining, among others:

- The guard post serves every complainant and records the registration number of the complaint and the contact number that can be contacted by the complainant, both verbally and in writing
- The discussion of complaints is carried out through an assessment of the complaints reported and recorded in the database as well as providing recommendations for follow-up
- In the event of communication to other parties during the assessment process, it must be done by maintaining the confidentiality of the identity of the complainant
- Unit of Certification also regulates complaints through demonstrations (bringing in mass and making threats, this is done by fostering relations with stakeholders long before there is a project and continuing to do it with or without a project in accordance with the results of the analysis and stakeholder management plan. ANJ security personnel to monitor security incidents and secure existing assets,

Based on the results of interviews with farmers, that they have understood the procedure for submitting complaints to the company PT Kayung Agro Lestari.

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

Unit of Certification has supported Mandiri with RSPO certification, among others, the company carried out a socialization of sustainable palm oil which was held on August 4, 2022. The socialization is described as follows:

- Whereas outside FFB suppliers expressed their appreciation to the management of PT Kayung Agro Lestari for their socialization of sustainable palm oil and oil palm cultivation techniques to independent smallholders, for example in Kuala Tolak Village.
- The application of good plantation techniques, among others, by using superior seeds for oil palm cultivation, oil palm nursery stages, fertilization and the effects and symptoms of nutrient deficiency in oil palm, methods of controlling water in tidal land and integrated pest control.
- Unit of Certification explained about the management of the HCV area, the conservation of orangutans and the call to protect the environment so that the species of animals and plants can remain sustainable.
- Unit of Certification provides an explanation regarding the legality of the land, the type of forest area status and areas that are not allowed to be planted with oil palm.

5.2.2

Unit of Certification has supported Mandiri with RSPO certification, among others, the company carried out a socialization of sustainable palm oil which was held on August 4, 2022. The socialization is described as follows:

- Whereas outside FFB suppliers expressed their appreciation to the management of PT Kayung Agro Lestari for their socialization of sustainable palm oil and oil palm cultivation techniques to independent smallholders, for example in Kuala Tolak Village.
- Application of good plantation techniques, among others, by using superior seeds for oil palm cultivation, oil palm nursery stages, fertilization and the effects and symptoms of nutrient deficiency in oil palm, methods of controlling water in tidal land and integrated pest control.

- Unit of Certification explained about the management of the HCV area, the conservation of orangutans and the call to protect the environment so that the species of animals and plants can remain sustainable.
- Unit of Certification provides an explanation regarding the legality of the land, the type of forest area status and areas that are not allowed to be planted with oil palm.

5.2.3

Unit of Certification has supported Mandiri with RSPO certification, among others, the company carried out a socialization of sustainable palm oil which was held on August 4, 2022. The socialization is described as follows:

- Whereas outside FFB suppliers expressed their appreciation to the management of PT Kayung Agro Lestari for their socialization of sustainable palm oil and oil palm cultivation techniques to independent smallholders, for example in Kuala Tolak Village.
- Application of good plantation techniques, among others, by using superior seeds for oil palm cultivation, oil palm nursery stages, fertilization and the effects and symptoms of nutrient deficiency in oil palm, methods of controlling water in tidal land and integrated pest control.
- Unit of Certification explained about the management of the HCV area, the conservation of orangutans and the call to protect the environment so that the species of animals and plants can remain sustainable.
- Unit of Certification provides an explanation regarding the legality of the land, the type of forest area status and areas that are not allowed to be planted with oil palm.

5.2.4

Based on the results of interviews with plasma farmers, the company has provided training on handling pesticides to plasma farmers in 2022.

5.2.5

Unit of Certification has reviewed and publicly reported on the progress of the farmer support program on a regular basis through the Progress Report on the Implementation of Plantation Business Permits for the April – June 2022 period of PT Kayung Agro Lestari regarding the plans and realizations that have been reported Quarterly to the Department of Animal Husbandry, Agriculture, Plantation, Ketapang Regency on 03 August 2022.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1; 6.1.2

Unit of Certification has a policy of respecting Human Rights which was established by the director on August 04, 2016. These policies include stating that company opens equal opportunities to prospective workers, does not discriminate against both workers and prospective workers, respects the uniqueness and wealth of talents and views of employees. In addition, the company also has an Employment Policy which is contained in the Internal Memo No.2/GMO/KAL/IM/II/2022 dated February 16, 2022. In the Policy, it is explained that the company provides equal opportunities to all people regardless of their background to work at PT KAL in accordance with the qualifications of the position and the number of workers required by the company and all recruitment costs are borne by the company (PT KAL).

Unit of Certification showed several socializations about sustainability policies related to the principles of RSPO. The sustainability policies that socialized include anti-discrimination policies. Examples of socialization of policies as follows:

- Socialization on 17 September 2022 attended by 20 workers
- Socialization on September 21, 2022 attended by 27 workers
- Socialization on 20 August 2022 attended by 38 workers in division 6
- Socialization on March 29, 2022 attended by 56 workers in division 5

Based on the verification of the labor register documents and interviews labor union, known that the workers come from various ethnic such as Java, Malay, Dayak and others. From the results of interviews with representatives of workers and workers, known that there is no indication of discrimination against workers. In addition, the results of interviews with village representatives,

obtained information that there is no indication of discrimination. Unit of Certification has provided equal opportunities for the surrounding community to get jobs.

6.1.3

Unit of Certification has kept a track record of employees. For employee recruitment, the stages for recruitment are job application letters, CV, copies of identity cards, and supporting documents such as certificates, diplomas, transcripts and others. Unit of Certification shows employee track record documents stored in each unit (factory and estate).

Unit of Certification has shown a record of the implementation of employment procedures, for example:

Recruitment

- Recruitment documentation with the initials MY and JN such as job application letters, results of health checks, ID cards, diplomas, Family card and others. Company has also shown probation agreement for that worker with the probation period of 3 months.

Appointment as permanent worker

- Decree on the appointment of permanent employee No. 002/HR&CM/KAL/SK/IX/2022 dated September 4, 2022 with initial RK (External Affair department). Employee recruitment documentation has been shown such as a job application letter, ID card, medical examination letter, initial assessment results, final assessment results etc.

Promotion

- Promotion letter No. 036/HRO/SM-KAL/VIII/2022 dated August 29, 2022 with initial RL from a maintenance worker to a maintenance foreman
- Promotion letter No. 008/HRO/SM-KAL/II/2021 dated February 27, 2021 with initial HJ from division clerk to estate clerk.

The results of interviews with workers and labor union revealed that labor procedures have been implemented by the company in accordance with applicable regulations. They also known that workers have already know about employment procedures such as termination, retirement or promotion. Based on that interview known that there is no discrimination against workers. Unit of Certification has provided employee rights in accordance with company regulations and applicable regulations.

6.1.4

Based on interview with women workers as well as gender committees revealed that pregnancy tests were only conducted for pesticide applicators to avoid the employees being exposed to pesticides. Further explained that so far there had never been a pregnancy test which was a discriminatory measure.

6.1.5

Unit of Certification already has a gender committee to deal with women's issues. The gender committee structure consists of a chairperson, vice chairperson, secretary, Head of Women's Empowerment, protection of women and children, prevention of sexual harassment issues. The structure of the gender committee also includes representatives of female and male worker.

The work program of the gender committee consists of:

- Conducting outreach/socialization related to the gender committee
- Socialization related to right and obligation of female worker
- And others.

The results of interviews with female workers known that the workers already know the gender committee and the functions of the organization. Workers are also aware of gender committee if there are complaints related to women's problems or issues. The results of interviews with representatives of women's committee and women workers, it was found that there were no complaints related to sexual harassment, violation in the last 1 year.

6.1.6

The determination of wages at PT Kayung Agro Lestari is based The Decree of the Governor of West Kalimantan No. 896/DISNAKERTRANS/2020 concerning the Sectoral Minimum Wage of Ketapang Regency in 2021 stipulates the wage for the Plantation and Palm Oil Processing Industry Sub-sector, which is Rp. 2,888,000.

The results of interviews and the verification of workers' wages e.g loose fruit picker with worker ID 0214 and ID 0414 (worker with same work and same grade), it is known that the company has given the same wages for the same scope of work and in the same grade.

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 implementation of the minimum wage at PT KAL based on the Decree of the Governor of West Kalimantan Number 896/DISNAKERTRANS/2020 concerning the Sectoral Minimum Wage of Ketapang Regency in 2021 stipulates the wage for the Plantation and Palm Oil Processing Industry Sub-sector, which is Rp. 2,888.000,- which has been enforced since January 1, 2021. The minimum wage for Ketapang Regency in 2022, has a value smaller than the Sectoral Minimum Wage for Ketapang Regency in 2021, which is Rp. 2,876,252.79. Thus, the company is still implementing the Ketapang District Sectoral Minimum Wage in 2021.

Company shows Internal Memo No. 002/ANJ/HRCM/IM/II/2022 dated January 26, 2022 regarding the implementation of minimum wages for non-staff employees. As for PT KAL the minimum wage in 2022 is Rp. 2,888,000. Based on the results of interviews, workers can explain the basic wages and allowances and deductions received every month.

Unit of Certification shows list of the number of workers for the August 2022 as follows: 2,026 workers (mill and estate). The number of contractor workers such as PT Manjau Agro Abadi with a total of 5 workers. Based on the results of interviews with workers at POM and Estate, it is known that workers have received wages in accordance with the minimum wage regulations.

6.2.2

Unit of Certification has a 2022-2024 Company Regulation which has been ratified based on the Decree of the Head of the Manpower and Transmigration Office No. 072/TKT-B.560/22 dated August 2, 2022. The procedure also explains the work requirements such as: wages, deductions, working hours, overtime, permits, leave and others.

The auditor team has simulated the calculation of workers' wages by verifying payroll documents for August 2022, for example factory workers with ID 0720 and plantation workers with ID 1136. From the verification results, it is known that the company has paid wages according to the applicable regulations. In addition, the company also shows payroll documents that provide information related to compensation for all work performance.

6.2.3

Unit of Certification has shown evidence of compliance with labor provisions, through:

- Payroll documentation that gives information on compensation for work performance. The results of the simulation of wages and overtime in August 2022, known that the company has paid overtime wages according to the workers' overtime hours and has complied with the applicable regulations. The simulation samples for overtime calculations for example:
 - For worker with ID 0720, has get overtime wages of Rp. 1,793,493
- Employee leave forms, such as:
 - Letter of maternity leave No. 019/HR&CM/KAL/IM/VII/2022 dated July 29, 2022 with initial EL
 - Letter of annual leave dated August 1, 2022 with initial TS
- Employee Attendance document every month which informs the number of attendances, leave, illness and others.

Based on document verification, interview with workers (harvesting workers, manuring workers, factory workers, etc.) known that there's no indication about the force labor. In addition, they get the wage accordance with the wage minimum regulation. Based on interview with harvester and wage simulation, known that harvest workers' wages are based on their work (base/target). If the worker gets the base/target, then he gets a premium, and if the worker does not get the base/target but has worked for 7 hours, then the worker gets 1 working day's wages (worth the minimum wage per day).

Interview with labor union and workers, said that wages paid are in accordance with applicable regulations. Based on that interview also known that deduction for workers such as BPJS deduction tax and has been described in the company regulation. Based on

interview with contractor and verification of wages of contractor workers (sample) known that contractor workers have given minimum wages by contractor.

6.2.4

The results of field observations in housing areas and interviews with workers and labor union known that the company has provided housing facilities, infrastructure and facilities that are decent/in good condition to workers such as houses, clean water facilities, religious facilities, sports, clinic and others. The condition of the house is permanent and has good sanitation. From the interview, also known that in each housing location there are child care areas, trash bins, generator rooms/houses (to provide electricity) and others.

6.2.5

The results of interviews with employees and labor union, known that there are sellers of foodstuffs especially for vegetables and side dishes that enter the plantation area on a regular basis. Unit of Certification also provides an employee cooperative that provides workers' daily needs including food. Based on the results of interviews with residents of housing and workers, it was stated that workers had obtaining adequate food sources at competitive prices.

6.2.6

The determination of wages at PT KAL based on the Decree of the Governor of West Kalimantan Number 896/DISNAKERTRANS/2020 concerning the Sectoral Minimum Wage of Ketapang Regency in 2021 stipulates the wage for the Plantation and Palm Oil Processing Industry Sub-sector, which is Rp. 2,888.000,- which has been enforced since January 1, 2021. The minimum wage for Ketapang Regency in 2022, has a value smaller than the Sectoral Minimum Wage for Ketapang Regency in 2021, which is Rp. 2,876,252.79. Thus, the company is still implementing the Ketapang District Sectoral Minimum Wage in 2021.

In relation to DLW (Decent Living Wage), the company has tried to do Prevailing Wage calculations for each unit, which included samples of In-Kind Benefits, such as Housing, electricity for home, water, etc. As for DLW calculation is based on actual and rational price at certification unit location.

6.2.7

Based on the results of verification of employment documents, interviews with management and labor unions and field observations, it is known that workers for the main jobs such as harvesting and factory operations, have been carried out by permanent workers. For contract workers/ temporary work agreement (PKWT) who are recruited directly by the company to carry out tasks such as maintenance and supporting. All temporary workers have been registered with the Ketapang District Manpower Office on September 1, 2022 based on letter no. 003/SPK/HRO/Kal/IX/2022. From the report, it was informed that there were 2 temporary workers at PT KAL with initial TC (has been appointed as a permanent employee) and initial MM (water machine operator).

Status: Comply

6.3

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

6.3.1; 6.3.2; 6.3.3

Unit of Certification has a policy of freedom of association for employees as stated in the GM Internal Memo addressed to all employees no. 094/GM/KAL/IM dated November 11, 2014 which explains that the Company guarantees freedom of association for workers/employees within PT KAL on the condition that the union/organization does not conflict with the prevailing laws and regulations in Indonesia and PT KAL's Company Regulations.

Unit of Certification shows several records of labor union meetings, such as:

- Minutes of the bipartite meeting on February 23, 2021 which is the monthly meeting of the Bipartite for the period of February 2021
- Minutes of PT KAL's internal SBPP meeting on March 15, 2021 which discussed several issues that would later be brought to bipartite negotiations. This meeting was attended by 12 members
- Minutes of the 28 March 2022 meeting between the company and labor union representatives.

The results of interviews with workers such as harvesters, factory workers and others, known that the company has provided socialization related to freedom of association. From the results of interviews with workers, known that there is labor union in the company. The PT KAL Labor Union has been registered at the Manpower Office of Ketapang Regency in August 24, 2020.

Based on interview with labor union known that company has given socialization related to guarantee freedom of association for workers/employees. Based on interview with labor union also known that there is no intervention related to election of workers representatives or in the implementation of any activities.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1; 6.4.2; 6.4.3; 6.4.4

The Company has an Employment Policy which is contained in Internal Memo No.2/GMO/KAL/IM/II/2022 dated February 16, 2022. In the Policy, it is explained that the company accepts workers with a minimum age limit of 18 years and does not employ children.

Unit of Certification showed several socializations about sustainability policies related to the principles of RSPO. The sustainability policies that socialized include Employment Policy. Examples of socialization of policies as follows:

- Socialization on 17 September 2022 attended by 20 workers.
- Socialization on September 21, 2022 attended by 27 workers.
- Socialization on 20 August 2022 attended by 38 workers in division 6.
- Socialization on March 29, 2022 attended by 56 workers in division 5.

Unit of Certification showed documentation of socialization of third party sustainability and compliance policies included socialization of minimum age for workers, such as The socialization on September 13, 2022 was attended by 20 participants consisting of representatives of management, contractors and the manpower office.

Unit of Certification has also shown agreement with contractors that have explained the prohibition on employing children under 18 years of age, forced labor and workers from human trafficking, for example agreement No. 158SPKB-3000080-10-0922 dated August 20, 2022.

The results of the verification of the labor list document, interviews with internal and external stakeholders, and field observations revealed that there was no indication of any workers under the age of 18.

Status: Comply

6.5

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

6.5.1; 6.5.2

Unit of Certification has guidelines for implementing the settlement of sexual harassment cases in Internal Memo No.019 / GMO / KAL / IM / III / 2015 from GM on March 1, 2015 with contents such as:

- Provide protection to all employees and staff who are victims of sexual harassment
- Forming a committee for handling sexual harassment issues made in a self-determination letter and a procedure in the settlement process is set out as described in this attachment.
- Give attention and facilitate to convey directly to the committee on sexual problems if there are employees who experience this.
- Counseling women affected by violence.

Policies to protect reproductive rights are contained in the Internal Memo of General Manager No. 096 / GM / KAL / IM dated 10 November 2014 concerning Protection of the Reproductive Rights of Female Employees. The memo explains that the company guarantees the protection of female employees' reproductive rights with mechanisms and procedures that are in accordance with the law, relevant ministerial regulations and company regulations.

Unit of Certification has provided socialization related to company policies including sexual harassment policies and protection of reproductive rights, such as:

- Socialization on 17 September 2022 attended by 20 workers.
- Socialization on September 21, 2022 attended by 27 workers.
- Socialization on 20 August 2022 attended by 38 workers in division 6.
- Socialization on March 29, 2022 attended by 56 workers in division 5.

The results of interviews with workers, especially female workers, revealed that the company had provided socialization related to policies to prevent sexual harassment and violence and protect reproductive rights. Unit of Certification already has a gender committee to handle women's issues or problems. The results of interviews with representatives of gender committee and female workers revealed that there were no cases of violence or sexual harassment in the last 1 year. In addition, from the interviews known that the company has gave permission/ maternity leave, menstrual leave and permission to breastfeed for female workers.

6.5.3

Unit of Certification has identified the needs of new mothers in semester 1 of 2022. As a follow-up to these activities, the company shows the Minutes of the results of the assessment of the needs of new mothers giving birth. The action plans from the results of these activities include:

- Provide opportunities for female workers who are breastfeeding to breastfeed their children during working hours
- Mothers who are breastfeeding do not work in chemical-related jobs
- etc.

The results of interviews with female workers and gender committee revealed that the company had given permission or time to breastfeeding mothers.

6.5.4

Unit of Certification has a SOP for communication and providing information with the document number SOP-Leg-02 with a date of effect on September 1, 2015. Based on the SOP, it has been explained that communication and providing information is divided into 2:

- Internal communication and information sharing
- External communication and information sharing

The SOP also regulates the guarantee of the confidentiality of the reporter and disclosure of disgrace (whistleblower).

The results of interviews with workers and labor union known that workers understand the grievance mechanism. Complaints can also be submitted to labor union. As for complaints related to women's issues can be submitted through the gender committee.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1; 6.6.2

The results of the verification of the labor register documents, work agreement documents, interviews with labor unions, workers, and the Manpower Office revealed that there were no casual daily workers in the company. There are only permanent workers and temporary workers/ PKWT (for maintenance and supporting) at PT KAL. From the results of interviews with workers, known that there is no forced labor in the company. All workers who work are in accordance with the mutually agreed agreement or letter of appointment.

For contract workers/temporary work agreement (PKWT) who are recruited directly by the company to carry out tasks such as maintenance and supporting. All temporary workers have been registered with the Ketapang District Manpower Office on September 1, 2022 based on letter no. 003/SPK/HRO/Kal/IX/2022. From the report, it was informed that there were 2 temporary workers at PT KAL with initial TC (has been appointed as a permanent employee) and initial MM (water machine operator)

Based on verification in temporary agreement, known that the agreement has explained several working conditions, rights and obligations of workers, wages, leave, social security and others. The agreement has been signed by both parties. From the results of interviews with workers and representatives of workers through labor unions, it is known that the company has provided a copy of the agreement to the workers.

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**

Unit of Certification has an OHS organization in accordance with the Decree of the Regent of Ketapang Number 560/03/NAKER/2022 concerning the Ratification of the Organizational Structure and Work Procedure of the OHS Committee of PT Kayung Agro Lestari on January 10, 2022 with the secretary of the OHS Committee named Hamdan Saragih who already has the OHS Decree No. 5/1993/AS.02.04/III/2021 dated March 31, 2021 which is valid for 3 years.

Unit of Certification also shows recordings of regular OHS Committee meetings that are held every month, for example the minutes of the August 2022 OHS Committee meeting held on September 9, 2022. The results of the discussion are briefly as follows:

- Cleaning of garbage and wood in the water intake cage area of the pump house.
- Pump engine flowmeter installation
- Prepare the cleanliness and condition of housing, division offices and Estate areas properly.
- The leaking condition of the DT-12 diesel tank.

6.7.2

Unit of Certification demonstrates the emergency response procedures contained in the Emergency Preparedness and Response Procedure document Number SOP-EHS-015 Revision 02, effective August 10, 2018 which briefly explains, among others:

- Identification of hazards and emergency needs.
- Emergencies in the Mill and Building Areas and their handling.

The results of field observations have provided emergency response equipment such as fire extinguishers, hydrants, first aid kits for buildings and first aid kits for field workers brought by the foreman. The results of the interview concluded that the personnel in charge of first aid had an understanding of the handling of first aid and could briefly explain the functions of the existing first aid equipment.

In addition, at the Mill and Estate locations, there are warnings of evacuation routes and assembly points that can be seen clearly and the location is known by workers.

6.7.3

Unit of Certification shows the Internal Memo of Provisions for the Provision of PPE Equipment dated September 16, 2020 No. 015/GMO/KAL/IM/IX/2020 which informs each - the lifetime of PPE, for example:

- Harvest Activities
 - Helmet once a year
 - Glasses once a year
 - Boots once a year
- Spraying Activities
 - Glasses 4 times a year
 - Chemical masks 4 times a year
 - Rubber gloves 4 times a year
 - Boots 4 times a year
 - Aprons 4 times a year
 - Work clothes 4 times a year
- Mill
 - Safety shoes once a year
 - Helmet once a year
 - Ear muffs 2 times a year
 - Ear plugs 4 times a year
 - Safety glasses 4 times a year
 - Aprons 2 times a year
 - Leather gloves 4 times a year
 - Rubber gloves 4 times a year
 - Mask 4 times a year

- Full body harness once a year

In the document it is also explained that if the PPE is damaged and it can be proven that the damage is caused by the PPE being routinely used to do work in the field, even though the service period has not ended, the company will provide replacement with new PPE. However, if the PPE is lost or the damage is not due to doing work, the cost of replacing the new PPE will be borne by the employee concerned.

Based on the results of field observations and interviews with workers both at the Mill and Estate, it is known that workers have used PPE in accordance with the determined risk analysis.

Based on the results of field visits and interviews, for example with fertilizing workers and spray workers at SGT-2, it is known that there are sanitation facilities that can be used by workers to remove PPE, clean themselves and put on their personal clothes. In addition, the company also showed a budget in 2022 for the construction of spray washing facilities, spraying rinse stations and PPE (Extension) hangers for each of the Mitra Estates (Mitra Bina Satong Lestari and Mitra Lestari Abadi Bersama).

Unit of Certification has the opportunity to realize the construction of a spray washing machine, a spray rinse and an PPE (Extension) hanger for each Mitra Estate (Koperasi Bina Satong Lestari and Koperasi Lestari Abadi Bersama) **(OFI)**.

6.7.4

Based on the results of interviews with workers, it was stated that the company had provided BPJS Health program facilities for workers and their families as well as BPJS Employment and workers had BPJS cards.

- BPJS Employment payment due for August 2022 (Non Mill) totaling 1,948 participants.
- BPJS Employment payment due for August 2022 (Mill) totaling 78 participants.
- BPJS Health payment due in August 2022 totaling 1,660 participants.

6.7.5

Unit of Certification shows the work accident report (LTA) contained in the EHS Index document, for example for 2022 as follows:

Unit	FR	SR	LTA
Mill	0	0	0
Estate	0	0	0

Based on the results of the interview, it is known that there are several incidents of work accidents in 2021, in connection with this the company can show some documentation, for example:

- Based on the 2021 work accident report, there was a work accident for a Mill Worker named Sudarmansyah on September 17, 2021, related to this the company can show a record of BPJS claims and proof of payment.
- Work Accident Investigation Report on the occurrence of work accidents against Herru Christanto's workers dated March 4, 2021. The document informs the chronology of accidents, analysis of the causes of accidents and prevention efforts.
- Work Accident Investigation Report on the occurrence of work accidents against Teguh Suwarno's workers dated January 30, 2021. The document informs the chronology of accidents, analysis of the causes of accidents and prevention efforts.

Status: Comply

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

7.1

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

7.1.1

The unit of certification has committed to implement integrated pest management (IPM) which presented in several document for example as follows:

- Document No. SOP-AGR-20 dated 01 April 2016 about integrated pest management.
- Document No. SOP-AGR-21 dated 01 August 2013 about rat control by barn owl.
- Document No. SOP-AGR-24 dated 01 August 2013 about rat control through chemical baiting.
- Document No. SOP-AGR-27 dated 01 August 2013 about termite control.

- Work Instruction No. IK-SOP AGR-02 dated 01 September 2015 about *Oryctes* control, etc.

Based on field observations, there have been implementations of biological pest control such as the use of beneficial plants and the installation of owl cages as a place for *Tyto alba*. In addition, based on the results of field observations and interviews, it was also found that there were signs of a massive rat pest attack and control was carried out with the application of rat poison.

So, it can be concluded that the company has implemented the existing IPM plan.

7.1.2

The results of field observations revealed that there are no species that are classified as invasive species according to the Minister of Forestry and Environment Regulation No. 94 in 2016. The species used for biological pest control include *Turnera subulata* and *Tyto alba*.

7.1.3

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

Status: Comply

7.2

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

7.2.1

Unit of Certification shows evidence that it has prioritized the selective use of pesticides to deal with targeted pests or weeds. The list of pesticides used includes:

Merk	WHO	Target	LD50
Amiphosate (480 gr/Ltr)	III	broadleaf weed	>5,000 mg/kg
Garlon 670EC (670 gr/Ltr)	II	broadleaf weed	>5,000 mg/kg
Ally 20 WG (20%)	III	Broad-leaf weeds, Narrow-leaved weeds	>2,000 mg/kg
Racumin Wax Block 0.0375 BB (0.0375%)	III	Rats	>5,000 mg/kg
Basta SL 150 (Ammonium Glufosinate 150 g/l)	II	broadleaf weed	593 mg/kg
Boral 480 SC (Sulfentrazon 480 g/l)	III	Broad-leaf weeds, Narrow-leaved weeds	>2,000 mg/kg
Dipel WG (1 M cfu/gr)	III	Needle Worm	>2,020 mg/kg
Marshal (5 gr/L)	III	<i>Oryctes</i>	>2,001 mg/kg
Penta Up-Z 480 SL	III	<i>Asystasia gangetica</i> , <i>Borreria alata</i>	>5,000 mg/kg
Ebor Bait 0.05 BB	IV	Rats	326.7 mg/kg
Starlon 665 EC	III	<i>Cromolaena odorata</i> , <i>Cliderrhina hirta</i> , <i>Melastoma Malabathicum</i> , <i>Mikania micrantha</i>	>2,000 mg/kg
Regent 50 SC (50 gr/ Ltr)	II	Termite	>2,000 mg/kg

7.2.2

Unit of Certification shows records of the pesticides used, for example for the use of the pesticide brand Ally 20 WG (20%) for GST-2 during 2021 as follows:

- Active Ingredients: *Metil Metsulfuron* 20%
- LD50: >2,000 mg/kg
- Application Area: 2,352.95 Ha
- Active Ingredients/ Ha: 12.94 gr/Ha
- Total Applications: 152,250 gr

7.2.3

As part of reducing the use of pesticides, the company has integrated biological control in pest control, for example by using beneficial plants aimed at controlling Palm leaf eating caterpillar pests and *Tyto alba* for controlling rat pests. Based on the results

of field observations on GST-1, GST-2, SGT-1, SGT-2 and Mitra Estate, it is known that the beneficial plant in a well-maintained condition and planted on the edge Street.

7.2.4

Based on the results of field observations of the study of the list of pesticide use documents, there is the use of pesticides to control rat pests. In the recording of pest observation and control, information was obtained, for example in SGT-1 in June 2022 there were attacks by rat pests as follows:

Divisi	Plant	% Attack
1	11,498	10.88
2	10,003	11.16
3	11,852	11.26

This is in accordance with the results of field observations where rat bite marks were found on FFB in Collecting Point. So, it can be concluded that the company applies pesticides based on the results of the census and not preventively.

7.2.5

The results of field observations in pesticide storage warehouses and a study of the list of pesticide use documents obtained information that there was no use of pesticides listed on the World Health Organization (WHO) Class 1A or 1B or included in the Stockholm or Rotterdam Conventions, as well as paraquat.

7.2.6

To ensure that pesticides are used or applied by people who have completed training and maintain competence of personnel, the company conducts regular training on, for example:

- Minutes of training on spray material, and the use of PPE, as well as proper and correct spraying techniques at Block E45 GST-2 on April 1, 2022, which was attended by 11 participants.
- Minutes of training on spray material, and the use of spraying/tool calibration at Block C35 SGT-2 on 19 May 2022 which was attended by 10 participants.
- Minutes of training on spray materials, and the use of spraying/tool calibration at Block B01 Division 1 SGT-1 on March 28, 2022, which was attended by 13 participants.

7.2.7

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

7.2.8

Unit of Certification already has a hazardous waste management SOP which is contained in the SOP for the Management of hazardous and toxic waste (hazardous waste) which has been in effect since November 15, 2021, explaining, among other things:

- Identify all hazardous waste produced, once a year or if there is a new use of hazardous outside the hazardous list.
- Provide labels on hazardous waste packages with symbols and labels for hazardous waste packaging markings provided by the EHS Department.
- Submit hazardous waste to the manager of the hazardous waste warehouse and when placing hazardous waste on the packaging, officers are required to use the appropriate Personal Protective Equipment (PPE).
- Every hazardous waste submission to hazardous waste is recorded in the hazardous waste handover proof form.
- Recording the hazardous waste balance sheet at Hazardous Waste Warehouse checked by the EHS Department every month to be included in the hazardous waste Balance Sheet form.
- hazardous waste officer is required to monitor storage activities at hazardous waste temporary storage place.

Unit of Certification already has a document on the results of monitoring procedures for hazardous and hazardous waste management, for example hazardous waste records include:

- On 27 August 2022 0.110 Tons of waste source comes from Central Workshop and Transport.

- As of August 30, 2022 0.800 Tons of waste source comes from Mill.
- As of August 31, 2022 0.011 Tons of waste source comes from Central Workshop and Transport.

Unit of Certification has a cooperation agreement document for the management of Hazardous Waste with the number 072/MULIA/PLB3/VII/2022 in collaboration with PT Mitra Utama Limbah Industri (hazardous waste transporter) and PT Andhika Makmur Persada (waste management party). hazardous). The cooperation agreement was stipulated on July 27, 2022 and is valid until July 26, 2022. And the transported hazardous waste includes used batteries/batteries, used hazardous packaging, electronic waste, used fabrics and used lubricating oil.

The carrier also has legal documents, including:

- Decree of the Director General of Land Transportation Number SK: 0097/AJ.309/1/DJPD/2021 concerning Permits for the implementation of Special Goods Transportation for transporting Dangerous Goods (hazardous) which is valid until 26 June 2025.
- Recommendation for the transportation of Hazardous Waste Number S.184/PSLB3-VPLB3/PPLB3./05/2021 to PT Mitra Utama Limbah Industri is set on 27 May 2021 and is valid for 5 years.
- Supervision Card of Permit for the Operation of Dangerous Goods Transport (hazardous) Number: SK.0097/AJ.309/1/DJPD/2021/100006318-00001 with vehicle number AD 8054 OF valid until 09 July 2022 (Status: In Process of Extension).

PT Andhika Makmur Persada (hazardous waste management party) also has permits including hazardous waste management permit for hazardous waste collection activities number SK.629/Menlhk/Setjen/PLB.3/1/2017 issued on November 10, 2017 valid until 12 February 2023.

Unit of Certification also submitted the hazardous waste produced to PT Mitra Utama Limbah Industri which was held on September 5, 2022, while the data for the hazardous waste is stated in the following table:

No	Type Of Waste	Amounts (Ton)	Waste Kode	No. Carried Wagon
1	Used oil	2.6	B105D	AD 8054 OF
2	Used drums	0.057	B104D	AD 8054 OF
3	Used filters	0.073	A 108 D	AD 8054 OF
4	Second hand	0.032	B 110D	AD 8054 OF
5	Clinical waste	0.070	A337-1	AD 8054 OF
6	Ex-chemical packaging	0.5705	B104D	AD 8054 OF
7	Used battery	0.0760	A102D	AD 8054 OF
8	Former paint can package	0.054	B104D	AD 8054 OF

And for the transportation festival document, which was carried out on September 5, 2022, it is currently in the process of being processed by the transport agency hazardous waste.

Unit of Certification can show an example of a festronic document on the transportation of hazardous waste which was carried out on March 1, 2022 which is stated in the following table:

No	Type Of Waste	Amounts (Ton)	Waste Kode	No. Carried Wagon
1	Used battery/battery	0.185	A102d	AD 8054 OF
2	Sacks Fabric, plastic, paper	0.024	B110d	AD 8054 OF
3	Used packaging hazardous	1.286	B104d	AD 8054 OF
4	Electronic waste (TL lamp, Printed Circuit Board (PCB), rubber wire, etc.)	0.001	B107d	AD 8054 OF
5	Clinical waste	0.086	A337-1	AD 8054 OF
6	Metal drums	1.45	B105d	AD 8054 OF
7	hazardous contaminated waste	0.119	A108d	AD 8054 OF

Based on the results of field observations to the Employee Housing Estate, it was not found that any used pesticide containers were used as trash bins, clean water reservoirs, and flower pots. In addition, the used pesticide packaging has been stored at the

hazardous waste storage that has a permit and then sent to a third party. The results of the field visit did not find any use of used pesticides for other activities.

7.2.9

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

7.2.10

Unit of Certification shows recordings of special medical examinations including spray workers along with the results of follow-up to workers who have health problems. Regarding health checks, it has also been explained in indicator 3.6.2

7.2.11

Unit of Certification has a policy that prohibits pregnant and breast-feeding personnel working with chemical material. Based on the results of interviews with fertilizer workers and spray workers, it was stated that workers who are pregnant or breastfeeding will be transferred to other jobs that are not exposed to chemicals. As a form of monitoring, the company shows the employee Menstrual Leave monitoring document based on the Internal and External Sick Certificate every month.

Status: Comply

7.3

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

7.3.1

hazardous Waste

Unit of Certification also submitted the hazardous waste produced to PT Mitra Utama Limbah Industri which was held on September 5, 2022, while the data for the hazardous waste is stated in the following table:

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6	Metal drums	1.45	B105d	AD 8054 OF
7	hazardous contaminated waste	0.119	A108d	AD 8054 OF

Solid Waste and Liquid Waste

Unit of Certification utilizes the solid waste produced such as empty fruit bunches that are applied to land, shells and fiber as boiler fuel and liquid waste is used for land applications. The utilization data for the period June 2022 – August 2022 is outlined in the following table:

Period	Waste Type			
	Empty Bunch (Kg)	Fiber (Kg)	Shell (Kg)	Liquid Waste (m3)
June	7,778,350	4,274,646	1,315,276	42,004
July	5,870,880	3,233,821	1,069,648	18,439
August	8,313,740	3,552,569	1,175,080	29,023

Unit of Certification has a Waste Management Plan procedure with document number SOP-EHS-008 revision 01 and is effective April 10, 2018. The procedure explains that solid waste management in the form of EFB produced from the mill is carried out in the Estate.

During the field visit at the Empty Bunch Area location, the EFB produced was mounting and the company also showed evidence of the realization of the application of EFB in the Estate for the period January – August 2022. In addition, the company also has a program for composting EFB which is stated in the Projection Compost document year 2023.

Unit of Certification has the opportunity to realize the empty bunch composting program in accordance with the set targets. **OFI**

7.3.2

Unit of Certification has disposed of waste in accordance with the mechanism regulated in the company's SOP, explaining, among other things:

Solid Waste Management SOP

Unit of Certification already has an SOP regarding waste management which is contained in the SOP Waste Management Plan document that was valid on April 10, 2018 which explains some of the waste that is reused such as Empty Fruit Bunches, Shells and POME from Mill. In particular, POME from Mill is used in land application activities with reference to applicable regulations and the use of household waste (organic waste) will be carried out by a composting program in each estate. In terms of reuse of waste, the waste generated must be made into an SOP for its use which can be used as a guide for employees in the field.

Hazardous Waste Management SOP

Unit of Certification already has a hazardous waste management SOP which is contained in the SOP for the Management of hazardous and toxic waste (hazardous waste) which has been in effect since November 15, 2021, explaining, among other things:

- Identify all hazardous waste produced, once a year or if there is a new use of hazardous outside the hazardous list
- Provide labels on hazardous waste packages with symbols and labels for hazardous waste packaging markings provided by the EHS Department
- Submit hazardous waste to the manager of the hazardous waste warehouse and when placing hazardous waste on the packaging, officers are required to use the appropriate Personal Protective Equipment (PPE).
- Every hazardous waste submission to hazardous waste is recorded in the hazardous waste handover proof form
- Recording the hazardous waste balance sheet at Hazardous Waste Warehouse checked by the EHS Department every month to be included in the hazardous waste Balance Sheet form
- hazardous waste officer is required to monitor storage activities at hazardous waste temporary storage place.

Based on the results of interviews, for example with officers at Hazardous Waste Warehouse, these officers already know how to implement the hazardous waste management procedures that have been set by the company.

Based on this explanation, it can be concluded that PT Kayung Agro Lestari has met the indicator 7.3.2

7.3.3

Unit of Certification does not dispose of waste by burning it in an open area, but the company manages the waste in accordance with the procedures set by the company.

Status: Comply

7.4

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

7.4.1

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

- No. SOP-AGR-08 about planting of cover crop (legumes).
- No. SOP-AGR-11 about fertilizer and manuring.
- No. SOP-AGR-12 about manuring in immature area and cover crop.
- No. SOP-AGR-23 about leaf sampling unit.
- No. SOP-AGR-26 about soil analysis.
- No. IK-SOP-AGR-011-01 about compost fertilizer.
- No. IK-SOP-AGR-011-007 about compost application.

The results of field observations revealed that the company had implemented measures to ensure soil fertility such as the use of oil palm fronds as an alternative nutrient source.

7.4.2

Procedure of Leaf and Soil sampling for manuring recommendation are presented in document No. SOP-AGR-23 and No. SOP-AGR-26. The procedure mentioned that leaf and soil analysis shall be conducted annually and every seven years, respectively. The procedure of leaf and soil sampling is presented has been implemented. Unit of Certification has shown recorded results of soil and leaf sampling analysis, for example:

- Soil Analysis Report (SGT-1 and SGT-2) from PT Nusa Pusaka Kencana Analytical & QC Laboratory Number 056/RD-EXT/S/JUL/19 dated July 1, 2019 for 37 samples. The parameters analyzed include: N, C-Organic, Ca, Mg, K, Na, Al, H, Mn, pH, etc.
- Soil Analysis Report (GST-1 and GST-2) from PT Nusa Pusaka Kencana Analytical & QC Laboratory Number 056/RD-EXT/S/JUL/19 dated July 1, 2019 for 23 samples. The parameters analyzed include: N, C-Organic, Ca, Mg, K, Na, Al, H, Mn, pH, etc.
- SGT-1 Leaf Analysis Report Number 1.070.1.1/03/21 dated 7 April 2021 for 44 samples. The parameters analyzed include: N, P, K, Ca, Mg, Cl, B.
- SGT-2 Leaf Analysis Report Number 1.070.2.1/03/21 dated 7 April 2021 for 37 samples. The parameters analyzed include: N, P, K, Ca, Mg, Cl, B.
- GST-1 Leaf Analysis Result Report Number 1.070.4.1/03/21 dated 7 April 2021 for 46 samples. The parameters analyzed include: N, P, K, Ca, Mg, Cl, B.
- GST-2 Leaf Analysis Report Number 1.070.51/03/21 dated April 7, 2021 for 47 samples. The parameters analyzed include: N, P, K, Ca, Mg, Cl, B.

7.4.3

The results of field observations found that the company had implemented a nutrient recycling strategy such as the application of EFB and the use of oil palm fronds from pruning. The recording of the EFB application for example the realization of the EFB application in 2022 in all units of 29,537.44 Tons with an area of 3,094.69 Ha.

7.4.4

Based on the results of the study of the planning document and the realization of fertilization, it is known that the types of fertilizers used include Urea, MOP, RP, and Dolomite, *Mycogold*, NPK, ZA, and Kaptan. The fertilization program and realization, for example, for the January – August 2022 period is as follows:

Unit	Program (kg)	Realization (kg)	Achievement
GST-2	1,676,207	949,643	57%
SGT-2	1,161,868	673,730	58%
GST-1	1,203,035	818,865	68%
SGT-1	1,172,768	403,374	34%
Mitra Estate	1,570,135	909,714	58%

<p>Based on the data above, it was concluded that the realization of fertilization was in line with the established program, but the realization was not 100% because the financial year was still running. The total realization of fertilization is 3,755,326 Kg with a realized production of 154,308,224 Kg, so that the application of fertilizer per ton of FFB is 24.34 Kg/Ton of FFB.</p>	
<p>Status: Comply</p>	
<p>7.5 Practices minimise and control erosion and degradation of soils.</p>	
<p>7.5.1 Based on the results of interviews with the company's management, there are no changes related to the Soil Type Map contained in PT. Kayung Agro Lestari. Unit of Certification has shown a map of the types of soil available to PT Kayung Agro Lestari (GIS/EST/ANJ-HO/PETA-446/PTKAL/13 FEN 2014) with a scale of 1: 40,000. Based on the map, it is known that the types of soil found in PT KAL are:</p> <ul style="list-style-type: none"> - Shallow peat (< 3 meters): 4557 ha - Deep peat (> 3 meters): 5,806.56 ha - Sand: 2670.5 ha - Minerals: 4,964.07 ha <p>In addition, the company has also shown a map of PT KAL's land clearance class with a scale of 1: 100,000. Based on the map, it is known that PT KAL's slope class is as follows:</p> <ul style="list-style-type: none"> - 0 – 8 (flat – wavy): 10,834.86 ha - 8.1 – 15 (wavy to hilly): 883.72 ha - 15.1 – 25 (hilly): 236.25 Ha - 25.1 – 30 (hilly to steep): 149.49 ha - > 40 (very steep): 77.28 ha 	
<p>7.5.2 Based on the results of the study of the area statement document, it is known that the oldest plant, namely the planting year of 2010 and until the assessment activity was carried out, the company does not yet have a replanting plan for at least the next 5 years.</p>	
<p>7.5.3 Based on the results of the study of the area statement document and field observations, it was found that the company did not carry out any new planting activities.</p>	
<p>Status: Comply</p>	
<p>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.</p>	
<p>7.6.1 Based on the results of the study of the area statement document and field observations, it was found that the company did not carry out any new planting activities.</p>	
<p>7.6.1; 7.6.2 Based on the results of field observations and document review, it is known that the company does not carry out any new planting development activities.</p>	
<p>Status: Comply</p>	
<p>7.7 No new planting on peat, regardless of depth after November 15th, 2018 and all peatlands are managed responsibly.</p>	
<p>7.7.1 Based on the results of field observations and document review, it was found that there were no new plantings after November 15, 2018.</p>	
<p>7.7.2</p>	

Unit of Certification has reported peat inventory to the RSPO secretariat (ghg@rspo.org) on 15 November 2019 by Diana.Ratna@anj-group.com and has received a reply from the RSPO secretariat on 27 November 2019 with the content of the email "My humble apologies for not reverting soon as we are verifying bulk of submissions at the moment. We acknowledge receiving this submission and noted that ANJ Group will update us should there be more accurate data available as well as the submission for uncertified area can be anticipated by 31st March 2020".

Unit of Certification has also reported an updated peat inventory report on August 5, 2020, however, until the completion of the surveillance-3 audits, there has been no recent response from the RSPO regarding this report.

Based on the submitted peat inventory data, it is known that the total area of peat is 5,885.61 (Planted) and 923.02 (unplanted).

7.7.3; 7.7.4; 7.7.5

Unit of Certification shows several documents related to the regulation of subsidence of high peat soil layers, including the following:

- Procedure No. SOP-AGR-05 dated 01 April 2016 regarding soil and water conservation.
- Work Instruction No. IK-SOP OPR 004-001 (Rev. 0) dated 01 June 2013 regarding the measurement of ground water level and subsidence rate.
- Work Instruction No. Dock. IK-SOP AGR 05-001 (Rev. 01) dated June 1, 2005 regarding water management which includes, among others, setting watergate, overflow, stopbund, piezometer, subsidence rate pipe and water level.

Unit of Certification already has facilities and infrastructure related to peat area management including:

- The results of the study on the Water Gate Management Map with a Scale of 1: 110,000 are known to have available peat area management facilities with details of 44 water reservoirs, 12 steel Water Gate units, 54 permanent stop bund units, 40 monitoring wells.
- The results of the study on the Position Map of the Water Gate and Stop Bund with a scale of 1: 110,000 are known to have provided peat area management facilities with details of 250 water gate units, 180 stop bund points and 99 piezometer and subsidence points.

Companies can show records of subsidence monitoring and groundwater level regulation, for example:

- GST-2
There are 10 subsidence monitoring points installed since April 2017 with a monitoring frequency of 2 times a year. Until the measurement in April 2022 the rate of subsidence of peat soil is between 10.78 cm – 20.33 cm.
- GST-1
There are 4 subsidence monitoring points installed since April 2017 with a monitoring frequency of 2 times a year. Until the measurement in April 2022 the rate of subsidence of peat soil is between 4.2 cm - 4.94 cm.
- SGT-1
There are 7 subsidence monitoring points installed since April 2017 with a monitoring frequency of 2 times a year. Until the measurement in April 2022 the rate of subsidence of peat soil is between 5.3 cm – 6.6 cm.
- SGT-2
There are 14 subsidence monitoring points installed since December 2016 with a monitoring frequency of 2 times a year. Until the measurement in April 2022 the rate of subsidence of peat soil is between 5.75 cm – 9.14 cm.
- Estate Mitra
There have been 5 subsidence monitoring points installed since 2017 with a monitoring frequency of 2 times a year. Until the measurement in April 2022 the rate of subsidence of peat soil is between 6.74 cm - 9.71 cm.

Monitoring of groundwater level (TMAT) is carried out once a week, based on the results of monitoring, for example on the fourth week of August 2022, it is known that the groundwater level (TMAT) fluctuates between 10 cm – 60 cm below the peat soil surface. Based on the results of field visits, for example at the stop bund location of SGT-2 Block A41 Division 5, it is known that the water level at the water level is 40 cm below ground level.

7.7.5

Based on the results of the study of the area statement document, it is known that the oldest planting year is 2010 so it can be concluded that there are no plants that are 15 years old. In addition, based on the results of interviews with management and

review of replanting program documents, it is known that the company does not yet have a replanting plan for at least the next 5 years, so a drainability study is not necessary.

7.7.7

Based on the review of the peat inventory document, it is explained that the unplanted peat area consists of 253.58 Ha (Infrastructure, building, etc.) with an explanation which is 118.04 ha (Unplanted Area) and; 136.54 ha (Enclave Area) and a conservation area of 669.44 ha.

Unit of Certification has monitored HCV areas or peat areas bordering oil palm plantations by installing HCV area signs, maintaining water level elevations outside the plantation area at all times and installing signs of fire-prone areas.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1 & 7.8.2

Unit of Certification has SOPs for identification, management and maintenance of water sources and quality as stated in the SOPs for soil and water conservation which took effect on April 1, 2016, explaining, among others:

- Conservation of the soil surface layer must be carried out to reduce erosion and runoff
- Water reservoirs and ditches must be maintained at a certain level, silting and maintenance of low-lying areas must be carried out regularly
- In acid sulfate and peat areas, water discharge is carried out at least 2 times a year to prevent potential toxins contained in the water, this is done at the beginning of the rainy season.
- Water management in trenches is the basic principle of measurement for increased growth and production in acid sulphate areas. As in peat areas, the benefits are reduced peat subsidence or loss.

Unit of Certification has documents on water management, water source maintenance and water quality measurement as stated in the RKL – RPL report for the first semester of 2022, the following are examples of sampling points for measuring water quality in surface water that have been carried out and are in accordance with the established quality standards:

- Siduk River Water
- Satong River Water
- Satong Kiri River Water
- Water from the Upper Kepayang River
- Kepayang Hilir River Water
- Satong Kanan River Water (LM)
- Central Satong River Water (LM)

Based on the results of interviews with employees, that employees are not limited to getting clean water and the water that flows to employee housing is in good condition.

7.8.3

Unit of Certification already has a waste water utilization permit as stated in the Ketapang Regent Decree Number: 399/PERKIMLH-C/2017 concerning Permit for Utilization of Wastewater for Application to Soil for PT Kayung Agro Lestari Oil Palm Plantation covering an area of 326.09 ha which is located in Matan Hilir Utara District, Regency Ketapang on July 25, 2017 and valid for 5 years.

Unit of Certification has also sent a letter of application for the extension of the waste water utilization permit for application to the ground with letter number 079/GM0/KAL/EM/VII/2022 to the Public Housing Service for Settlement and Environmental Areas of Ketapang Regency and the company has received a follow-up on the application letter. number B/1328/PERKIMLH-E.660.1/VIII/2022 concerning the direction of Technical Approval for the use of waste water for application to the ground (Land Application).

From the letter, the Department of Public Housing for Settlement and Environmental Areas of Ketapang Regency has conducted a review at the company PT Kayung Agro Lestari to determine whether the existing permit can be extended or apply for technical

approval for the use of waste water to the ground and is currently in the process of being determined by the Office. People's Housing in the Settlement and Environmental Areas of Ketapang Regency.

Unit of Certification has the opportunity to ensure the process related to the status of the permit for the utilization of the wastewater.

Unit of Certification has a WWTP pond layout that explains the function of each pond consisting of a Cooling Pond, anaerobic pond 1, anaerobic pond 2, anaerobic pond 3, anaerobic pond 4, anaerobic pond 5, anaerobic pond 6, suction pool, pump house, and pump.

Unit of Certification already has a SOP regarding waste management which is contained in the SOP Waste Management Plan document which was effective on April 10, 2018 which explains some of the waste that is reused such as Empty Fruit Bunches, Shells and POME from Mill. In particular, POME from Mill is used in land application activities with reference to applicable regulations and the use of household waste (organic waste) will be carried out by a composting program in each estate. In terms of reuse of waste, the waste generated must be made into an SOP for its use which can be used as a guide for employees in the field.

Unit of Certification already has a document on the results of testing the quality of liquid waste which is applied to the land for the period January - August 2022. The test is carried out by KAN (LP-892-IDN) and KAN (LP-024-IDN) accredited laboratories using quality standards that refer to LA Permen LH Number 28 of 2003. Based on the results of the analysis of the test document, it shows that all the parameters tested are in accordance with the applicable quality standards.

The summary of tests for 2022 of BOD and pH parameters that have met the standards are outlined in the following table:

Parameters		January	February	March	April	May	June	July	August
BOD	mg/L	651	826	3,320	400	676	997	811	126
pH	-	7.85	8.57	7.98	7.81	7.62	7.51	8.00	8.00

Information:

- Testing period January – July using KAN accreditation laboratory (LP-892-IDN)
- Testing for the August period using the LP-024-IDN accreditation laboratory

Based on the results of interviews with the Environmental Service regarding the management of POME at the WWTP, there were no issues related to environmental pollution, the results of interviews with people from villages around the company also stated that there was no pollution from POME produced by the company.

Based on this explanation, it can be concluded that the company has complied with the quality standards of POME discharged and/or utilized according to the quality standards of POME disposal and/or utilization and has not caused pollution to the environment.

7.8.4

Unit of Certification already has a water use permit as stipulated in the Decree of the Head of the Office of Investment and One Stop Integrated Services of West Kalimantan Province Number 503/07/SDA/DPMPTSP-C.I/2021 concerning the Granting of a Water Resources Concession Permit to PT Kayung Agro Lestari in Ketapang Regency, Province West Kalimantan.

The maximum recommended water discharge is 90,000 m3/month.

Unit of Certification also has obligations that are stated in the permit, including:

- Pay the water resources management service fee and pay other financial obligations in accordance with the laws and regulations.
- Protect and secure water resources infrastructure.
- Carry out efforts to control and prevent the occurrence of water pollution.

Unit of Certification has recorded the use of water for example for the period January – August 2022 which is stated in the following table:

Month	Water Use (m3)
January	29,818
February	24,948

March	27,776
April	31,105
May	22,680
June	47,310
July	35,709
August	39,197

From the use of the water, the Company has proof of payment of the water tax, for example for the period August 2022, which was paid to BPD KALBAR on September 20, 2022.

Based on this explanation, PT Kayung Agro Lestari already has a water use document for the palm oil processing unit.

Status: Comply

7.9

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

7.9.1

Unit of Certification has data on increasing the efficiency of using fossil fuels and optimizing the use of renewable energy in the following table:

Month (2021-2022)	FFB Processed Kg	CPO Production kg	Fiber kg	Shell kg	kWh Turbine	kWh Genset	Energy produced Kcal	Kcal/t on FFB
September	21,394,561	4,579,298	2,781,293	855,782	600,400	83,256	11,332,271,070	530
October	18,270,878	3,965,927	2,375,214	730,835	445,340	87,408	9,677,718,659	530
November	19,309,637	4,011,427	2,510,253	772,385	579,100	63,840	10,227,928,526	530
December	17,861,279	3,572,437	2,321,966	714,451	543,580	75,432	9,460,762,261	530
January	18,068,655	3,743,706	2,348,925	722,746	544,580	91,102	9,570,605,180	530
February	18,092,192	3,753,965	2,351,985	723,688	512,538	63,288	9,583,072,259	530
March	28,964,647	5,952,372	3,765,404	1,158,586	839,760	41,400	15,341,994,223	530
April	28,696,738	5,989,683	3,730,576	1,147,870	781,100	48,744	15,200,088,184	530
May	28,811,924	5,945,481	3,745,550	1,152,477	722,620	58,560	15,261,099,904	530
June	32,881,891	6,526,340	4,274,646	1,315,276	955,600	35,112	17,416,880,025	530
July	24,875,545	5,008,618	3,233,821	1,069,648	788,400	48,264	13,500,704,538	543
August	27,327,451	5,466,075	3,552,569	1,175,080	763,900	61,680	14,831,427,481	543
Total	207,719,043	42,386,240	27,003,476	8,465,371	5,908,498	448,150	110,705,871,794	533

Unit of Certification can show records of the use of fiber and shells as renewable energy for the period September 2021 – August 2022. The processed FFB data is 207,719,043 Kg with a total utilization of 8,465,371 Kg of shell and 27,003,476 Kg of fiber utilization. From the results of the utilization of the shell, the turbine kWh produced is 5,908,498 KWH and the kWh Genset used is 448,150 KWH. The efficiency of using renewable energy is 28.44 kWh/Ton FFB.

Based on this information, the company has increased the efficiency of the use of fossil fuels and optimized the use of renewable energy.

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

Unit of Certification has calculated GHG emissions for the period 2021 using the Palm GHG Calculator version 4.0. The data is compliant and verified on the RSPO PalmGHG Calculator (Palm GHG version 4.0). The summary of GHG emissions from the PalmGHG calculator is presented in the following table:

Summary Emission

Product	tCOe2/Product
CPO	7.80
PK	7.80
PKO	0.00
PKE	0.00

Description	Unit	Value
Oil planted on mineral soil	Ha	5219.71
Oil Palm planted area on peat	Ha	6947.71
Total oil palm planted area (forested)	Ha	12167.42
Conservation area (Forested)	Ha	3812.52
Conservation area (Non-Forested)	Ha	32.00
FFB Production per hectare	t/Ha	17.03
OER	%	27.67
KER	%	4.15

Mill Emissions and Credits

Description	tCO2
Emission Sources	
POME	35172.17
Fuel Consumption	1092.82
Grid Electricity Utilization	0.00
Credits	
Export of Excess Electricity to Housing & Grid	-266.62
Sale of PKS	-23408.59
Sale of EFB	0.00
Total	12589.78

Estate/Plantation fields emissions and sinks

Description	tco2e		
	Own	Group	3 rd Party
Emission Source			
Land Conversion	147879.17	0.00	51300.56
CO2 Emissions from Fertilizer	7414.13	0.00	1791.37
N2O Emissions from Peat	46704.93	0.00	5303.81
N2O Emissions from Fertilizer	8330.91	0.00	1954.38
Fuel Consumption	620.71	0.00	34.50
Peat Oxidation	340658.62	0.00	38685.19
Sinks			
Crop Sequestration	-89659.64	0.00	-24248.48
Sequestration in Conservation Area	-33792.18	0.00	-1168.62
Total	428156.64	0.00	73652.71

Emissions from Palm Kernel Crusher

Emission Source	tco2E
PK from own mill	0.00
PK from other source	0.00
Fuel Consumption	0.00
Total Crusher Emissions	0.00

FFB Supplier

No.	Supplier Name	FFB Production by Estate/Plantation (t)	FFB Supplied by Estate/Plantation (t)	Percentage of FFB supplied by Estate/ Plantation (%)
1	Gunung Sejahtera Tumbuh 1	51216	51216	100.00
2	Gunung Sejahtera Tumbuh 2	38855.57	38855.57	100.00
3	Sungai Gemilang Teduh 1	48339.57	48339.57	100.00
4	Sungai Gemilang Teduh 2	26910.63	26910.63	100.00
5	Koperasi Laman Mayan Sentosa (S)	36401.65	36401.65	100.00
6	Koperasi Laman Mayan Sentosa (NS)	1079.96	1079.96	100.00
7	Koperasi Bina Satong Lestari	3225.16	3225.16	100.00
8	Koperasi Lestari Abadi Bersama	1177.47	1177.47	100.00

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 following table, the company has calculated GR through the Palm GHG calculator and reported it publicly.

7.10.2

Based on the results of the document review, it is known that the distribution of the company's planting years is 2010, 2011, 2012, 2013, and 2016. In 2014 the company carried out the 2014 New Planting Procedure (NPP) for all of PT KAL's oil palm plantations with an area of ±18,800 Ha (according to the location permit) and notification of the NPP was submitted to the RSPO website on 29 March 2014 and there were no complaints until 29 April 2014 so that the plantation development process can be continued (On Going NPP, 2009). NPP assessment conducted by PT Mutuagung Lestari on January 30, 2014 with the following conclusions "Therefore PT KAYUNG AGRO LESTARI has followed the RSPO New Planting Procedure. The assessment and plan documentation is carried out in a comprehensive and professional manner in accordance with RSPO requirements and complies with the RSPO Principles and Criteria for new plantings."

7.10.3

Unit of Certification has carried out measurements of emission sources Semester I 2022 period which is contained in the test results document as well as the RKL-RPL document for Semester I 2022. The tests carried out by the company include tests (odor, vibration, and noise) in the work area and housing. Based on the results of the verification of the document, it shows that all test results are in accordance with the quality standards set for each applicable law and regulation, including:

- Noise quality standard based on Ministry of Environment Decree No. 48 of 1996
- Vibration quality standard based on Ministry of Environment Decree No. 49/1996
- Odor quality standards are based on Ministry of Environment Decree Number 50 of 1996

The following is a summary of the test implementation and the test parameters have met the established standards, including:

- Noise Testing
 - Residential Housing
 - Community settlements
 - In front of Factory office
 - Boiler Station

- Press Station
- In factory
- Vibration Test
 - Press Station
- Ambient Air Test
 - Residential housing
 - Community housing
 - In front of the factory office
- Boiler Emissions
 - Boiler 1 capacity 35,000 kg/hour
 - Boiler 2 capacity 52,000/hour
- Genset Emissions
 - Genset 01 capacity 635 Kva
 - Genset 02 capacity 635 Kva
 - Genset 03 capacity 635 Kva

Unit of Certification has also carried out reports from standard technical measurements of disturbance levels from immovable sources through RKL-RPL reporting, including:

- Report of RKL – RPL Semester I 2022 to the Ministry of Environment and Forestry on 29 July 2022.
- Report of RKL – RPL Semester I 2022 to the Department of Public Housing for Settlement and Environmental Areas of Ketapang Regency on July 14, 2022.
- Report of RKL – RPL Semester I 2022 to the Environment Agency of West Kalimantan Province on July 14, 2022.

Unit of Certification has documents for handling disturbances from emission sources, including:

- Operational maintenance of stations and machines in the mill as indicated in the January – August 2022 document.
- Provide PPE to employees with evidence of the Handover of PPE to factory employees in the form of earmuffs and earplugs in 2022.
- Testing of air and ambient emissions every 6 months with a KAN-accredited laboratory and contained in the first semester of 2022 RKL-RPL report.
- Health checks for employees such as those carried out on boiler operators and examinations carried out in the form of audiometry, spirometry and cholinesterase which were last carried out in 2022.

In addition, the company also continues to make efforts to reduce the impact of immobile disturbances, for example for the noise factor as evidenced by field observations in the boiler station area which is equipped with a warning about the obligation to use earmuffs or earplugs in areas with high noise levels. Visitors are also given earplugs when entering the factory area.

Based on this explanation, it can be concluded that PT Kayung Agro Lestari has met the indicator 7.10.3

Status: Comply

7.11

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

7.11.1; 7.1.2

Unit of Certification has fire prevention and control procedures which are described in the SOP for Land Fire Control (Document No.SOP-EHS-005 edition 02/revision 01, effective date 10 April 2018). This procedure is intended as a safety guide in fire control. This procedure was created by the HSE Coordinator and approved by the GM. The procedure explains: preparation of fire control, implementation of fire control, provisions if the fire has been extinguished, fire prevention efforts.

Procedures for preventing and controlling land and forest fires include: risk analysis, preparation of hotspot maps (fire-prone areas), identification of fuel thickness, socialization of fire prevention and danger, identification of availability of water sources, rainfall data, construction of fire towers, equipment in fire tower, fire patrol by the fire task force team (fire team).

Unit of Certification already has firefighting personnel who are part of the emergency response structure. Personnel have also received training by Manggala Agni and evidence of training from the Ministry of Manpower Classes D, C, B, A. In addition, the company also has facilities and infrastructure for controlling land fires that refer to applicable regulations, for example:

- Fire watch tower
- Extinguishing equipment (personal equipment)
- Squad equipment
- Hand tools
- Water pump and accessories
- Means of data processing and communication
- And others

Unit of Certification has made efforts to prevent and control land fires, including reporting on the Preparedness system, forest, land and plantation fire control units to relevant agencies, such as:

- Fire patrol → Fire patrol report for example on September 21, 2022 which informs the condition at block L56-58 is in safe condition.
- Fire facilities inspection → Inspection of fire facilities on August 18, 2022 and all equipment is in good condition
- Firefighters training → For example: Training by Manggala Agni and the Ministry of Manpower for Class D, C, B, A and Training on land and forest fire prevention.
- Report on the preparedness of the system, fire facilities for controlling forest, land and plantation fires for the first semester of 2022 on 11 July 2022 to the Department of Agriculture, Livestock and Plantation of Ketapang Regency, District Secretariat of Ketapang Regency etc. Based on the report, there were no fires in the company's operational areas. And there was one fire incident in the occupied land belonging to the Manjau hamlet community (land clearing) in block E19/20. The company's rapid response is in the form of supervision and countermeasures from the company.

7.11.3

Unit of Certification already has firefighting personnel who are part of the emergency response structure. Personnel have also received training by Manggala Agni and evidence of training from the Ministry of Manpower Classes D, C, B, A. In addition, the company also has facilities and infrastructure for controlling land fires that refer to applicable regulations, for example:

- Fire watch tower
- Extinguishing equipment (personal equipment)
- Squad equipment
- Hand tools
- Water pump and accessories
- Means of data processing and communication
- And others

Unit of Certification has involved stakeholders in terms of fire prevention and control, as shown in the Report on the Implementation of Land and Forest Fire Control Training for *Kelompok Tani Peduli Api* and firefighters in Laman Satong Village and Kuala Tolak Village, Matan Hilir Utara District, 29 – 31 March 2022.

Based on the results of field observations in the operational activities, it shows that there is no indication of land clearing by burning. Based on interviews with management, it was stated that all land clearing activities were mechanical. Based on an interview with relevant agencies, it was also stated that the company has shown a commitment not to burn for land clearing through fire simulation activities involving various stakeholders.

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

All of PT KAL's oil palm plantations were developed after November 2005 through land clearing from June 2009 - November 2013 and initial planting started in April 2010. PT KAL has carried out the 2014 New Planting Procedure (NPP) and notification of the NPP was submitted to the RSPO website on 29 March 2014 and there were no complaints until April 29, 2014 so that the plantation development process can be continued (On Going NPP, 2009).

NPP assessment conducted by PT Mutuagung Lestari on January 30, 2014 with the following conclusions "Therefore PT KAYUNG AGRO LESTARI has followed the RSPO New Planting Procedure. The assessment and planning documentation is carried out in a comprehensive and professional manner in accordance with RSPO requirements and complies with the RSPO Principles and Criteria for new plantings."

Unit of Certification conducted activities to track and identify the presence of HCVs in 2013. The field survey was carried out on 19-26 October 2013 with a public consultation on 25 October 2013 attended by 36 participants representing the surrounding community, the Agriculture Office of Ketapang Regency, BKSDA of Ketapang Regency, NGOs (Palu Foundation). The results of the Public Consultation are stated in the Public Consultation Notification document.

The Company sent an Email template for preparation of the Zero Disclosure report to RSPO Compensation (rspocompensation@rspo.org) on 16 July 2014 and was responded to by RSPO Compensation on 17 July 2014 by Dillon Sarim (RSPO Compensation Coordinator). Unit of Certification has carried out a LUCA and sent to the RSPO along with other supporting data, the last submission was on 21 August 2019. Based on the RSPO email on 30 August 2019, it was stated that "The RaCP case for PT KAL will be considered closed", however, there are areas of remediation that need to be addressed. required for oil palm grown on peatlands and riparian buffer zones. PT KAL shall identify and delimit areas of remediation required, and develop and implement a remediation plan in accordance with RSPO requirements, following the RSPO BMP. The remediation plan will be reviewed by the auditor in accordance with the certification requirements and P&C.

Unit of Certification has a PT Kayung Agro Lestari remediation plan in 2022, with the following categories:

- Land subsidence management and monitoring
- Monitoring the depth of the peat water table within the block
- Water management and canal drainage
- Prevention of forest and land fires
- Define river border area
- Restore the function of the river border

From the category of remediation plans, the company has actions in remediation, namely:

- Measure the rate of subsidence of peat soil.
- Perform water level marking and water monitoring in peat areas with a Piezometer.
- Carry out flood impact and potential management.
- Provide education on the dangers of fire to the outside community in collaboration with the village government.
- Establish permanent river boundaries, non-permanent flow boundaries, artificial drainage.
- Marking border areas, restoring hydrological functions, monitoring river water quality.

7.12.2

The Company does not undertake new land clearing is done after November 15, 2018, so that the existing HCV assessment remains valid. Unit of Certification has the results of the identification of protected areas contained in the final report document identification of the presence of High Conservation Value PT Kayung Agro Lestari Ketapang Regency - West Kalimantan Province in collaboration with the Faculty of Forestry - IPB explained, among others, identification activities in the area of PT Kayung Agro Lestari showed that the Conservation Value area The identified heights include HCV1 (HCV 1.2 and HCV 1.3), HCV 4 (HCV 4.1 and HCV 4.2) and HCV 6. The area identified as a high conservation value area is 3,884.53 ha covering river borders (328.83 Ha), Conservation Forest area (2,988.10 Ha), Hill (462.49 Ha).

Then the company re-mapped the conservation area within the scope of the HGU with a total area of 1122.99 hectares with the following description:

- Gunung Sejahtera Tumbuh 1 with an area of 502.37 hectares
- Gunung Sejahtera Tumbuh 2 with an area of 37.18 hectares
- Gemilang Teduh River 1 with an area of 373.63 hectares
- Gemilang Teduh River 2 with an area of 69.9 hectares
- Koperasi Laman Mayan Sentosa with an area of 127.44 hectares
- Koperasi Bina Satong Lestari 12.47 hectares

Based on the explanation above, it can be concluded that PT Kayung Agro Lestari has identified high conservation value areas.

7.12.3

Based on the notice on the RSPO website it is known that the High Forest Cover Landscapes and High Forest Cover Countries have not been established by the RSPO. So that this standard has not yet been assessed.

7.12.4

Unit of Certification already has the SOP for the Management of High Conservation Value Areas which took effect on October 1, 2018 explaining, among other things:

- Marking the boundaries of HCVF in the field using a Global Position System (GPS) device based on the map of HCV identification
- Provide facilities and infrastructure to protect HCV (Plants and Animals) areas; provision of facilities in the form of maps of HCV areas, HCV signboards containing information on HCV name, HCV type, HCV area and various types of activities that are PROHIBITED such as hunting, mining, felling trees, gardening and legal sanctions while taking into account the wisdom of the local community.
- Conduct routine or periodic surveillance and patrols on HCVs that are prone to disturbances and the results of monitoring and patrol activities are written in the prepared report format
- Planning the development of plantation infrastructure by taking into account the HCV
- Develop and monitor a population management plan for protected species of plants and animals contained in the HCV
- Conduct an inventory of Non-Timber Forest Products (NTFPs) in the HCV such as honey, rattan and others
- Supervise and control the use of NTFPs according to the concept of sustainable use
- Reducing the occurrence of water pollution by using environmentally friendly agricultural chemicals in the Estate area
- Conducting outreach and outreach to the community

Unit of Certification already has a map of the location of the HCV area contained in the PT Kayung Agro Lestari Conservation Area Map document with a scale of 1:85,000 with map legends including Village, Road, River, Divisional Boundary, Estate Boundary, PT KAL HGU, Enclave and Self-Declared Conservation. The map also shows the location of PT Kayung Agro Lestari's HCV management.

Unit of Certification has a review of HCV identification at PT Kayung Agro Lestari in 2021, while the HCV findings are as follows:

- HCV 1. Areas that have an important level of biodiversity, found 3 species of plants that are protected according to PermenLHK No. 106 of 2018 namely the Kantong Semar Putih (*Nepenthes albomarginata*), Kantong Semar Taji Dua (*Nepenthes bicalcarata*), and Kantong Semar Bibir Bergaris (*Nepenthes spectabilis*).
- HCV 1.3 Areas that are habitats for populations of threatened species, limited distribution or protected species that are able to survive, from the findings there are species and habitats that meet the NT 1.3 criteria as described above, while the locations that become HCV 1.3 include conservation area I (Tanjung Sekuting), Conservation Area II (Kiras Hill), Penakal Hill, Berumbang Hill, and Kasai Hill.
- Unit of Certification also identified a location that has high cultural values for the local community, namely the Laman Randu cemetery (located in the Laman Randu enclave). However, the location is outside the plantation location of PT Kayung Agro Lestari, currently the location is managed jointly between the Kepayang Hamlet Community and PT Kayung Agro Lestari
- On deep peat, it is declared a high conservation value area with an area of 120 hectares. The initial location is a thicket with a deep peat depth and will be converted into a forested area. Trees will be planted to reforest the area.

Unit of Certification also has HCV management documents contained in the High Conservation Value Area Management Report for the period August 2022, which was prepared by the PT KAL Conservation Department with a summary that explains, among other things:

- HCV area patrol by conservation task force
- Patrol and Monitoring the HCV area with stakeholders
- Biodiversity Inventory
- Maintenance of HCV signboards and boundary markers
- Monitoring of orangutan conflicts with companies
- Phenology

- Creation of media campaigns and participation in environmental expo activities
- Socialization of HCV to staff, employees and contractors
- Procurement of information and communication media as well as HCV souvenirs
- HCV signboard creation
- Repair and construction of gazebo in HCV 657 Ha
- QR Code creation and installation

Unit of Certification has carried out socialization of protected areas and HCVs to workers and communities around the plantations and has been reported through the RKL – RPL report for the first semester of 2022. The summary of evidence of the socialization is as follows:

- Socialization to employees of Division 08 Estate Mitra which was attended by 52 participants on January 27, 2022
- Socialization to employees of Division 11 Estate GST 01 which was attended by 47 participants on 19 February 2022
- Socialization to the Laman Satong Village Community which was attended by 23 participants on February 24, 2022
- Socialization to the Association of Early Childhood Education Educators in Matan Hilir Utara District which was attended by 18 people on March 23, 2022 at the Kuala Satong Center Rest Area.

Based on this explanation, the company already has an SOP and a management plan for high conservation value areas.

7.12.5

After the HGU was processed, there were areas that were originally identified as HCV areas but were not granted a HGU Permit (enclaved) including overlapping with Mining Permits, for example Conservation Area II covering an area of 2,330.88 Ha, Laman Satong Tua Tomb, Laman Rindu Tomb and Keramat Batu Inap.

Currently the 2330.88 Ha area has been designated as an KKE area, which has been agreed by various parties. It can be shown the Decree of the Governor of West Kalimantan No. 718/DISHUT/2017 regarding the establishment of Essential Ecosystem Areas (KKE) in North Kayong Regency and Ketapang Regency, West Kalimantan Province. In the decree, it is explained that the freshwater swamp landscape - Mendawa watershed and the Orangutan corridor landscape of Sungai Putri - Gunung Tarak - Gunung Palung are determined according to the map in the attachment of the document. The decree was issued on 17 November 2017. Attached is a 1:100000 scale map, published by the Governor of West Kalimantan. The decree was jointly signed by the Forestry Service, the Sustainability Director of PT KAL, Bappeda Ketapang, PT BGA, and the Sustainability Trade Initiative.

Unit of Certification can show the minutes of the agreement on the joint commitment to the management of the HCV area of the Laman Randu sacred tomb dated April 12, 2016 in the core zone area of 100 Ha.

Unit of Certification has collaborated with surrounding villages in the implementation of conservation management, for example in August 2020 a Patrol with the Village Forest Management Agency (LDPHD) Laman Satong was carried out in several HCV areas.

7.12.6

Unit of Certification already has the SOP for the Management of High Conservation Value Areas which took effect on October 1, 2018 explaining, among other things:

- Marking the boundaries of HCVF in the field using a Global Position System (GPS) device based on the map of HCV identification
- Provide facilities and infrastructure to protect HCV (Plants and Animals) areas; provision of facilities in the form of maps of HCV areas, HCV signboards containing information on HCV name, HCV type, HCV area and various types of activities that are PROHIBITED such as hunting, mining, felling trees, gardening and legal sanctions while taking into account the wisdom of the local community.
- Conduct routine or periodic surveillance and patrols on HCVs that are prone to disturbances and the results of monitoring and patrol activities are written in the prepared report format
- Planning the development of plantation infrastructure by taking into account the HCV
- Develop and monitor a population management plan for protected species of plants and animals contained in the HCV
- Conduct an inventory of Non-Timber Forest Products (NTFPs) in the HCV such as honey, rattan and others
- Supervise and control the use of NTFPs according to the concept of sustainable use
- Reducing the occurrence of water pollution by using environmentally friendly agricultural chemicals in the Estate area

- Conducting outreach and outreach to the community

Unit of Certification also has HCV management documents contained in the High Conservation Value Area Management Report for the period August 2022, which was prepared by the PT KAL Conservation Department with a summary that explains, among other things:

- HCV area patrol by conservation task force
- Patrol and Monitoring the HCV area with stakeholders
- Biodiversity Inventory
- Maintenance of HCV signboards and boundary markers
- Monitoring of orangutan conflicts with companies
- Phenology
- Creation of media campaigns and participation in environmental expo activities
- Socialization of HCV to staff, employees and contractors
- Procurement of information and communication media as well as HCV souvenirs
- HCV signboard creation
- Repair and construction of gazebo in HCV 657 Ha
- QR Code creation and installation

The HCV management activities, for example for the period January – June 2022, have been reported to the West Kalimantan Province BKSDA agency SKW I Ketapang on 27 July 2022.

Unit of Certification identified flora and fauna in the period January – June 2022, identified 3 protected plant species, namely *Nepenthes albomarginata*, *Nepenthes bicalcarata*, and *Nepenthes spectabilis*.

Unit of Certification carried out socialization of protected areas and HCVs to workers and communities around the plantations and this has been reported through the RKL – RPL report for the first semester of 2022. The summary of evidence of the socialization is as follows:

- Socialization to employees of Division 08 Estate Mitra which was attended by 52 participants on January 27, 2022
- Socialization to employees of Division 11 Estate GST 01 which was attended by 47 participants on 19 February 2022
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- Socialization to the Association of Early Childhood Education Educators in North Matan Hilir District which was attended by 18 people on March 23, 2022 at the Kuala Satong Center Rest Area

Based on this explanation, the company already has SOPs for conserving biodiversity, plans to manage areas of high conservation value, identify flora and fauna and carry out socialization to the surrounding community and workforce to preserve the flora and fauna.

7.12.7

Unit of Certification shows the 2021 HCV management report and the 2022 report to date. For the 2021 report the management unit has carried out management and monitoring such as the management plan it has, among others. Conduct training on wildlife inventory and orangutan surveys. HCV patrol and monitoring Together with stakeholders, enrichment of habitat in conservation areas and conduct socialization related to HCV to workers, community or other stakeholders.

From the monitoring results in 2021, it is known that the management carried out has been quite effective, this can be seen from the results of monitoring flora and fauna or the condition of the HCV area which is still well maintained. Furthermore, the management will evaluate the HCV management in 2021 for the 2022 management plan. From the evaluation results, several important points include:

- HCV 1. Areas that have an important level of biodiversity, found 3 species of plants that are protected according to PermenLHK No. 106 of 2018 namely the Kantong Semar Putih (*Nepenthes albomarginata*), Kantong Semar Taji Dua (*Nepenthes bicalcarata*), and Kantong Semar Bibir Bergaris (*Nepenthes spectabilis*).
- HCV 1.3 Areas that are habitats for populations of threatened species, limited distribution or protected species that are able to survive, from the findings there are species and habitats that meet the NT 1.3 criteria as described above, while the locations

that become HCV 1.3 include conservation area I (Tanjung Sekuting), Conservation Area II (Kiras Hill), Penakal Hill, Berumbang Hill, and Kasai Hill.

- Unit of Certification also identified a location that has high cultural values for the local community, namely the Laman Randu cemetery (located in the Laman Randu enclave). However, the location is outside the plantation location of PT Kayung Agro Lestari, currently the location is managed jointly between the Kepayang Hamlet Community and PT Kayung Agro Lestari
- On deep peat, it is declared a high conservation value area with an area of 120 hectares. The initial location is a thicket with a deep peat depth and will be converted into a forested area. Trees will be planted to reforest the area.
- Increasing community participation in HCV management.

Unit of Certification also has HCV management documents contained in the High Conservation Value Area Management Report for the period August 2022, which was prepared by the PT KAL Conservation Department with a summary that explains, among other things:

- HCV area patrol by conservation task force
- Patrol and Monitoring the HCV area with stakeholders
- Biodiversity Inventory
- Maintenance of HCV signboards and boundary markers
- Monitoring of orangutan conflicts with companies
- Phenology
- Creation of media campaigns and participation in environmental expo activities
- Socialization of HCV to staff, employees and contractors
- Procurement of information and communication media as well as HCV souvenirs
- HCV signboard creation
- Repair and construction of gazebo in HCV 657 Ha
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7.12.8

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Unit of Certification has a PT Kayung Agro Lestari remediation plan in 2022, with the following categories:

- Land subsidence management and monitoring
- Monitoring the depth of the peat water table within the block

- Water management and canal drainage
- Prevention of forest and land fires
- Define river border area
- Restore the function of the river border

From the category of remediation plans, the company has actions in remediation, namely:

- Measure the rate of subsidence of peat soil
- Perform water level marking and water monitoring in peat areas with a Piezometer
- Carry out flood impact and potential management
- Provide education on the dangers of fire to the outside community in collaboration with the village government
- Establish permanent river boundaries, non-permanent flow boundaries, artificial drainage, etc
- Marking border areas, restoring hydrological functions, monitoring river water quality, etc.

Status: Comply	
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3.2 Conformity Checklist of Certificate and Logo Use

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

3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of ANJA against the rules for partial certification was determined through Self-Assessment in accordance with RSPO Certification System clause 4.5.4. A summary of findings is as stated below.

ANJA Time Bound Plan (TBP) is explaining in table section 1.10.1 ANJA has run five (5) mills and eight (8) management unit/company in Indonesia. All mills and estates are operated in Indonesia. ANJA has informed the TBP progress through head office in Indonesia.

MUTU has verified partial certification for un-certified unit's subsidiary of ANJA based on their Time Bound Plan. There are four (4) uncertified management unit of ANJA. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There is no significant land conflicts which have not been declared above
- Unit of Certification 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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company statement : Unit of Certification are already doing internal audits.</p> <p>Auditor verification: Internal Audit for uncertified management unit</p> <ul style="list-style-type: none"> • PT Galempa Sejahtera Bersama has been conducted Internal Audit on 16 – 20 November 2021.
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)	<p>Company statement: Unit of Certification has been reporting disclosure and zero liability to RSPO. Progress result of review LUCA at follow up by email to RSPO.</p> <p>Auditor Verification : ANJA and its subsidiaries have been reporting disclosure and zero liability to RSPO by email dated August 24, 2015. The validation progress of Remediation and Compensation Plan (RaCP) for the area opened since November 1, 2005 without preceded by the identification of HCV in accordance with RaCP Procedure will be observed again on the next visit audit.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>company statement: NPP has been applied</p> <p>Auditor Verification :</p> <ul style="list-style-type: none"> • PT Galempa Sejahtera Bersama, NPP date of notification on May 2, 2014.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p>Company statement: There is land conflict, but there is documented evidence that land conflict has been process for resolution.</p> <p>Auditor verification : Unit of Certification has had a mechanism for addressing land conflicts, described in the SOP of Handling Differences Opinion with the Community and Dispute Tenure (SOP-Leg-03, Issue 01, dated 1 September 2015).</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p>Company statement: There is no labour disputes</p> <p>Auditor verification : Unit of Certification has a mechanism for grievance described in SOP Handling of Differences of Opinion with Public and Land Dispute (Document No. SOP-EAD-01; Issue 01/00) dated August 1, 2013.</p> <p>A policy related to confidentiality of informant (whistle-blower) regulated in the SOP of Communication and Provision Information (Document No. SOP-Leg-02, Issue 01/04, dated 1 September 2015), it's mentioned in the section 6 of tis SOP.</p> <p>There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p>
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Company statement: All legal requirement for palm oil plantation has been comply</p> <p>Auditor verification : PT Galempa Sejahtera Bersama</p> <ul style="list-style-type: none"> • Status of PT GSB based on Forest Area Indicated (TGHK) is Non Forest Designated Area (Area Penggunaan Lain) • Location Permit No. 525/535/KEP/HUTBUNTAMBEN/2012, 20 April 2012 • Plantation Permit No. 525/423/KEP/HUTBUNTAMBEN/2013, 08 May 2013 • HGU on process • Environment Permit No. 211, 2013, dated 06 May 2013 • SEIA No. 210, 2013, dated 1 May 2013

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.	: 2021.01	Issued by	: Rahmat Abdiansyah
Date Issued	: 15 October 2021	Time Limit	: Next Surveillance (ASA-3)
NC Grade	: Minor	Date of Closing	: 30 September 2022
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 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 2013 by the Faculty of Forestry, IPB. As one of the efforts to improve and pay attention to the existing situation in 2019, the company carried out a Social Impact Review and Update for external aspects, but the results of the review only discussed:</p> <ol style="list-style-type: none"> 1. Social aspects related to external (external) parties where the results are stated in the CID (Community Involvement Department) Program document, but the results of the previous SIA plan and management have not been shown including evaluation of compliance, impact management carried out including social management programs especially those that have a negative impact that need to be managed for the next period. 2. The impact of internal operational activities has not been discussed, for example from the operational activities of plantations and mills, OHS and Employment including from the existence of conservation areas that intersect with the community. <p>Then in 2021 the company is in the process of conducting a review for social impact assessment both internally and externally however:</p> <ol style="list-style-type: none"> 1. The external stakeholders involved in the preparation of the management plan and social monitoring are not known which parties are involved and have not paid attention to the broadly affected parties such as women, migrants, local residents, youth leaders, contractors and other affected parties. 2. It can be shown that the evaluation of PT KAL's 2021 social monitoring and management plan matrix for internal purposes has not yet been provided but there is no basic information on the management plan that has been reviewed, and furthermore it cannot be shown that internal stakeholders have been involved in the management plan and social monitoring. <p>Furthermore, the results of the document review and interviews with management and stakeholders (internal and external) revealed that the company had implemented a social management and monitoring plan, which was carried out partially by the relevant departments, so that the reports on activities carried out were not comprehensive and integrated, for example:</p> <ul style="list-style-type: none"> - Employment and OHS impacts are managed by HR and EHS. - Environmental Impact and HCV managed by EHS and Conservation. - External Impact managed by CID (Community Involvement Department). - Plantation and mill operations are managed by the plantation and mill operations team. <p>By doing it partially by the relevant departments, there are potential impacts that arise but are not managed in a comprehensive and integrated manner on several issues that are developing now and in the future, for example, but not limited to:</p> <ul style="list-style-type: none"> • Attention to the impact of the company's operational activities and efforts to minimize it. 			

- The potential for social jealousy among Plasma Cooperatives regarding the amount of RSPO premium price given by the company.
- Potential social jealousy from plasma cooperatives that are not yet included in the scope of certification.
- Potential jealousy between plasma cooperatives and contractors regarding job opportunities that can be outsourced / work contracts.
- Attention related to labor issues (centralization of housing, transportation of workers, changes in the number of workers, terms of employment, workers' income and the existence of trade unions).
- Compliance issues related to laws and regulations for third parties (contractors).

Non-Conformance Description (filled by auditor):

The management and monitoring of the SIA carried out by the company has not been carried out comprehensively by integrating between sections/departments covering all impacts and representative samples of affected parties.

Root Cause Analysis (filled by organization audited):

The SIA management program is still being carried out partially because it is still carried out by each responsible department and is not combined.

Correction (filled by organization audited):

Conduct a comprehensive review of the SIA management and monitoring program for various impacts.

Corrective Action (filled by organization audited):

Develop a comprehensive SIA management program in accordance with the SIA review that has been carried out.

Assessor Evaluation and Conclusion (filled by auditor):

Verification September 30, 2022 (ASA-3)

Unit of Certification shows some evidence of improvement including:

- SIA review involving various stakeholders from community representatives or workers on 29 October 2021. The results of the SIA review in February 2021 and October 2021 are incorporated into the 2022 SIA Management Plan.
- SIA Management Plan 2022 which regulates various kinds of social issues both Internal and External, implementation programs, implementation targets, implementation time plans. Some of the social management plans include:
 - Increased socialization to the community both in intensity and socialization participants
 - Build Communication and Network with stakeholders
 - Improving the quality of health for the community
 - Community Economic Empowerment
 - Improving the Quality of Public Education
 - Environmental Management Program
 - Work safety and SOP
 - Facilitation of Housing, Education, Health and Transportation
 - Employee periodical MCU, Provision of Supplements for workers and Training for field workers to improve work quality.
- Unit of Certification shows a report on the implementation of SIA management for the period January – August 2022 with several activities that have been carried out including the Stakeholder Meeting on September 19, 2022, Implementation of Health Services 16-25 August 2022, Community Learning Class, Construction of Worker Housing, Progress of compliance with regulations for contractors.

Based on the evidence of improvement shown, the non-conformity is declared to have been fulfilled.

Verified by : **Bayu Yogatama**

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-3 Assessment

NCR No. :		Issued by :	
Date Issued :		Time Limit :	
NC Grade :		Date of Closing :	
Standard Ref. & Requirement :			
Evidence observed (filled by auditor):			
No Non-conformance identified in ASA-3			
Non-Conformance Description (filled by auditor):			
Root Cause Analysis (filled by organization audited):			
Correction (filled by organization audited):			
Corrective Action (filled by organization audited):			
Assessor Evaluation and Conclusion (filled by auditor):			
Verified by :			

3.4.3. Opportunity for Improvement

No	Ref.	Description
1	2.1.1	<p>The unit of certification complies to relevant regulations.</p> <p>Unit of Certification already has a wastewater utilization permit which is stated in the Ketapang Regent Decree Number: 399/PERKIMLH-C/2017 concerning Wastewater Utilization Permit for Application to Soil for PT Kayung Agro Lestari Oil Palm Plantation covering an area of 326.09 HA which is located in Matan Hilir Utara District, Regency Ketapang on July 25, 2017 and valid for 5 years.</p> <p>Unit of Certification has also sent a letter of application for the extension of the wastewater utilization permit for application to the ground with letter number 079/GM0/KAL/EM/VII/2022 to the Public Housing Service for Settlement and Environmental Areas of Ketapang Regency and the company has received a follow-up on the application letter. number B/1328/PERKIMLH-E.660.1/VIII/2022 regarding the directives for the use of wastewater for application to the ground (Land Application).</p> <p>From the letter, the Department of Public Housing for Settlement and Environmental Areas of Ketapang Regency has carried out a review of the company PT Kayung Agro Lestari to determine whether the existing permit can be extended or apply for technical approval for the use of wastewater to the ground and is currently in the process of being determined by the Office. People's Housing in the Settlement and Environmental Areas of Ketapang Regency.</p> <p>Unit of Certification has the opportunity to ensure the process related to the licensing status for the utilization of the wastewater.</p>
2	2.2.2	<p>All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.</p> <p>Unit of Certification shows progress documents for compliance with regulations by contractors until September 2022, such as fulfilling wages according to the minimum wage, BPJS employment, BPJS Health, workers' work agreements, age requirements, PPE and others. Based on the document, it is known that the contractor has not fulfilled the 100% compliance with the regulations. Related to this, the company shows the target of the fulfillment plan until September 30, 2023.</p> <p>Based on this explanation, the company has the opportunity to ensure the realization of the targets that have been made.</p>
3	3.6.2	<p>The effectiveness of the H&S plan to address health and safety risks to people is monitored</p> <p>The results of interviews and review of the Powerhouse Station Work Shift schedule show that in one day it is divided into 4 work shifts with the division of Working Hours 07.00 – 17.00 (WIB), 15.00 – 23.00 (WIB), 17.00 – Stop Process and 23.00 – 07.00 (WIB). . If referring to the Powerhouse Station Work Shift schedule, it is possible that there is only 1 worker in 1 shift working at the Powerhouse Station, namely at 7.00 – 15.00 (WIB) and at the time of stopping the process – 07.00 (WIB) if the process stops before 7.00 (WIB)).</p> <p>Based on the review of the operator certification list document, it is known that there is 1 worker who has not received certification training/licensing for PLTU and PLTD an. Johan W and the results of the interview with management stated that the employee in question has only worked at the Powerhouse Station for approximately 1 year and is planned to participate in PLTU and PLTD training/certification in 2023.</p> <p>So that the company has the opportunity for improvement to ensure the realization of personnel license/competency training according to the type of work.</p>
4	6.7.3	<p>Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application,</p>

No	Ref.	Description
		<p>machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>Unit of Certification also showed a budget in 2022 for the construction of spray washing facilities, spraying rinse stations and PPE (Extension) hangers for each of the Mitra Estates (Mitra Bina Satong Lestari and Mitra Lestari Abadi Bersama).</p> <p>Unit of Certification has the opportunity to realize the construction of a spray washing machine, a spray rinse and an PPE (Extension) hanger for each Mitra Estate (Mitra Bina Satong Lestari dan Mitra Lestari Abadi Bersama).</p>
5	7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p> <p>Unit of Certification has a Waste Management Plan procedure with document number SOP-EHS-008 revision 01 and is effective April 10, 2018. The procedure explains that solid waste management in the form of Empty Fruit Bunch produced from the mill is carried out in the Estate.</p> <p>During the field visit at the Empty Bunch Area location, the empty fruit bunch produced was mounting and the company also showed evidence of the realization of the application of empty fruit bunch in the Estate for the period January – August 2022. In addition, the company also has a program for composting empty fruit bunch which is stated in the Projection Compost document. Year 2023.</p> <p>Unit of Certification has the opportunity to realize the empty bunch composting program in accordance with the set targets.</p>

3.4.4. Noteworthy Positive Components

No	Description
1	Management commitment to implement sustainable palm oil management principles.
2	Personal competence related to compliance with sustainable palm oil certification standards.
3	Have cooperation in the development of plasma plantations for the community
4	Has implemented an EPMS (Electronic Plantation Management System) system for FFB transportation and delivery activities.
5	Has used a patrol system based on Spatial, Monitoring and Reporting Tools (SMART-RBM) for PT Kayung Agro Lestari conservation monitoring.
6	Have used a barcode system to identify the status, type and species of plants
7	Provide drinking water facilities for workers.
8	Have a Sycanus & Barn Owel Captivity

3.5 Summary of Arising Issues from Public and Auditor Verification

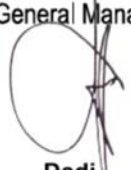
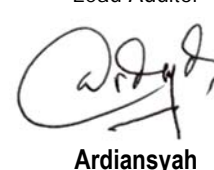
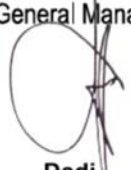
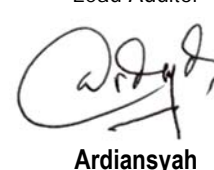
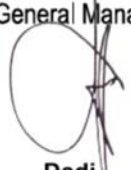
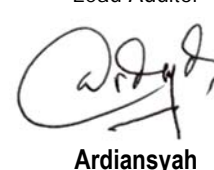
Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Environment Agency of Ketapang Regency</p> <ul style="list-style-type: none"> • Unit of Certification is proactive in establishing communication with agencies, both requests for advice, directions and fulfillment of regulatory obligations • Liquid waste reports, hazardous waste reports and RKL-RPL reports are submitted regularly and completely • There are no environmental issues due to non-compliance with regulations related to the implementation of environmental management and monitoring activities 	<p>There are no negative issues related to environmental management and monitoring, as well as the impact on the community and the surrounding environment</p>
<p>Head of Manpower Department of Manpower and Transmigration Office of Ketapang Regency</p> <ul style="list-style-type: none"> • Unit of Certification has registered labor unions and Bipartite • The new Head of the Manpower Division took office in January 2022. During his tenure, there were no problems or related to employment at PT KAL. • The 2022 wage applied at PT KAL is in accordance with the applicable regulations. The wages applied are based on the sectoral minimum wage of Ketapang Regency in 2021. • Unit of Certification has routinely submitted mandatory manpower reports such as Mandatory Labor Reports, and reports on the use of PKWT/temporary worker. The use of temporary workers is still in accordance with applicable regulations • Unit of Certification uses the Company Regulations. The Company Regulations have been approved by the Labor Union. • There are no issues related to work accidents. • There are no issues related to employment. 	<p>There are no negative issues that need further verification</p>
<p>Plantation Agency Ketapang Regency 27 September 2022</p> <ul style="list-style-type: none"> • Permits related to plantations owned by the company are good and communication between agencies and companies is quite good, including if there is a request for information. • The plantation office last conducted a field visit in 2022 related to the evaluation of permits. • The information delivery system through SIPERIBUN is already running. • With regard to FFB pricing, PT KAL has so far been a monitor and has not been actively involved in the pricing team. 	<p>There are no negative issues that need further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> There were no complaints submitted either by the surrounding community, or FFB suppliers who collaborated with the company. The fire prevention and control infrastructure owned by the company is adequate and so is the reporting. 	
<p>National Land Agency of Ketapang Regency</p> <p>Based on the results of the interview, it is known that during the 2021-2022 period there were no additional new use rights, and there were no reports regarding land disputes and conflicts with communities or outside parties. It was also explained that the company had also reported a report on land use / right to cultivate for the period 2021.</p> <p>Based on the results of the interview, it was also known that communication and cooperation between the National Land Agency office and the company were well established,</p>	<p>There are no issues that need further verification.</p>
<p>Laman Satong Village, Kuala Tolak Village & Kuala Satong Village.</p> <p>The company's relationship with the community is very good. The social responsibility provided includes assistance in community activities such as support in customary activities, road infrastructure improvements, and absorption of village communities as company workers</p> <p>The process for land compensation is carried out on the basis of an agreement between the two parties without coercion or intimidation</p> <p>The land compensation process has been carried out with a negotiation process, good administration, involving witnesses and mediation of the traditional leader, village head, sub-district head and police.</p>	<p>In general, the information conveyed by stakeholders regarding social relations is very good. The company's existence has a positive impact on the surrounding community through social responsibility programs. There are no issues of conflict or land dispute between the community and the company</p>
<p>CV Cahaya Sejati FFB and Waste Transportation</p> <ul style="list-style-type: none"> The cooperative relationship has gone quite well Unit of Certification also carries out socialization of best management practices to local farmers 	<p>There are no negative issues</p>
<p>CV Abadi Loc Jaya Freight Forwarders and CPO</p> <p>The cooperative relationship has been going quite well and there were no obstacles during the collaboration</p>	<p>There are no negative issues</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Patriot Pancasila Labor Union (SBPP) PT. KAL</p> <ul style="list-style-type: none"> • Determination of the minimum wage at PT KAL in 2022 based on the sectoral minimum wage in Ketapang Regency in 2021. • Unit of Certification has implemented wages and overtime in accordance with applicable regulations. • Not all workers have received BPJS Health cards. It has been submitted to HR and the latest information obtained is currently still being collected in the field. Even so, workers do not have difficulty if they want to go to a clinic or health facility. • Unit of Certification has carried out special and periodic (general) health checks on a regular basis • There has been a work accident at the company • PPE has been provided free of charge and will be replaced if damaged • There were cases of layoffs in 2022. The layoffs related to indiscipline and the process/stages of layoffs were in accordance with applicable regulations. • Previously there were complaints regarding insufficient water supply. However, currently the company has followed up with the provision of water reservoirs and is still in progress for all units. 	<p>Auditor team has verified implementation of worker welfare and has been explained in principle 6.</p> <p>Company has showed letter from BPJS Health No. 1081/XIII-02/0622 dated June 15, 2022 that inform Information on the use of NIK/ID Number as the identity of BPJS health participants. Related to this, company will socialize related to the information.</p> <p>Related work accident, has been explained in indicator 6.7.4</p> <p>Related to layoffs in 2022, has been explained in indicator 3.5.2.</p>
<p>Gender Committee</p> <ul style="list-style-type: none"> • Gender Committee structure has represented each gender Male and female • Unit of Certification has granted permission/menstrual leave and maternity leave to female workers. • Unit of Certification gives permission to female workers to breastfeed • For female workers who are breastfeeding who are in the office, there is an empty room provided for pumping breast milk • There were no complaints or reports related to harassment, sexual violence or others in the last 2 years. 	<p>There are no negative issues that need further verification.</p>
<p>Kayong Agro Sejahtera Cooperation 27 September 2022</p> <ul style="list-style-type: none"> • The cooperative was founded in 2015 and is engaged in the procurement of goods such as basic necessities and others. • Starting in 2021, all employees will automatically become members of the cooperative and currently there are 714 members. 	<p>There are no negative issues that need further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> • So far, the forms of support provided by the company include the provision of buildings and vehicles to purchase goods for cooperatives. • The last Annual Member Meeting was held in September 2022 and one of them appointed the new Chairman of the Cooperative. • In cooperatives there are contributions including a basic fee of IDR 50,000 and a mandatory fee of IDR 30,000 • So far there have been no complaints related to the company's involvement in supporting the existence of the cooperative. 	
<p>PT Manjau Agro Abadi 27 September 2022</p> <ul style="list-style-type: none"> • PT Manjau Agro Abadi has been working with the company for a long time, but before using the name of an individual, the collaboration using the name PT Manjau Agro Abadi has only been running for a few months. • Ongoing cooperation in the field of plant care and maintenance. • Workers who work at PT Manjau Agro Abadi are local villagers with non-permanent status which is based on the work assigned by PT KAL, and a list of workers according to existing activities has been given to PT KAL. • BPJS registration for workers at PT Manjau Agro Abadi is still in the process due to the new socialization by BPJS regarding registration for workers whose work is not permanent. • PT KAL also conducted training for PT Manjau Agro Abadi workers, including those related to OHS and technical work carried out. • So far there have been no complaints related to the cooperation that has been established and communication has been established quite well. 	<p>There are no negative issues that need further verification.</p>
<p>PT Pilarean Composting Contractor</p> <p>PT Pilarean is a contractor company that works in the construction of composting facilities. Headquartered in Medan. Currently there are 33 workers at the KAL POM location, the obligation to pay according to the standard use of PPE and others has been stated in the agreement. And always monitored regularly by KAL management.</p>	<p>There are no negative issues that need further verification.</p>
<p>Mitra Lestari Abadi Bersama Cooperative Manager</p> <p>The relationship between the company and the cooperative is going well. Forums are discussed and dialogue is open to respond to any existing problems.</p>	<p>There are no negative issues that need further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Some of the LAB areas were hit by fires in 2019, this caused poor productivity and conditions on the ground. Following up on this, Cooperative LAB is seeking land use loans like the BSL cooperative did.</p> <p>The Physical Assessment has been carried out by the Local Plantation Service, but so far the results have not been released.</p>	

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY		
4.1	Formal Sign-off of Assessment Findings		
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <table border="0" data-bbox="487 735 1299 1008"><tr><td data-bbox="487 735 730 1008"><p>PT Kayung Agro Lestari General Manager</p><p>Dadi Friday, 21 October 2022</p></td><td data-bbox="1055 735 1299 1008"><p>Mutuagung Lestari Lead Auditor</p><p>Ardiansyah Friday, 21 October 2022</p></td></tr></table>	<p>PT Kayung Agro Lestari General Manager</p>  <p>Dadi Friday, 21 October 2022</p>	<p>Mutuagung Lestari Lead Auditor</p>  <p>Ardiansyah Friday, 21 October 2022</p>
<p>PT Kayung Agro Lestari General Manager</p>  <p>Dadi Friday, 21 October 2022</p>	<p>Mutuagung Lestari Lead Auditor</p>  <p>Ardiansyah Friday, 21 October 2022</p>		

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Environment Agency	Ketapang Regency	-	Interview by Phone	27/09/2022	✓	
2	Manpower Agency	Ketapang Regency	-	Interview by Phone	27/09/2022	✓	
3	Plantation Agency	Ketapang Regency	-	Interview by Phone	27/09/2022	✓	
4	Land Agency	Ketapang Regency	-	Interview by Phone	27/09/2022	✓	
5	Laman Satong Village	Ketapang Regency	-	Interview by Phone	27/09/2022	✓	
6	Kuala Tolak Village	Ketapang Regency	-	Interview by Phone	27/09/2022	✓	
7	Kuala Satong Village	Ketapang Regency	-	Interview by Phone	27/09/2022	✓	
8	CV Cahaya Sejati (FFB Supplier)	Ketapang Regency	-	Interview by Phone	27/09/2022	✓	
9	CV Abadi Loc Jaya (Transporter CPO/PK)	Ketapang Regency	-	Interview by Phone	27/09/2022	✓	
10	Patriot Pancasila Labor Union	PT KAL	-	Direct Interview	27/09/2022	✓	
11	Gender Committee	PT KAL	-	Direct Interview	27/09/2022	✓	
12	Kayong Agro Sejahtera Cooperation	PT KAL	-	Direct Interview	27/09/2022	✓	
13	PT Manjau Agro Abadi	PT KAL	-	Interview by Phone	27/09/2022	✓	
14	PT Pilarean (Composting Contractor)	PT KAL	-	Direct Interview	29/09/2022	✓	
15	Mitra Lestari Abadi Bersama Cooperative	PT KAL	-	Direct Interview	29/09/2022	✓	
16	KAL POM <ul style="list-style-type: none"> • 1 sterilizer operator • 1 loading ramp operator • 1 engine room operator • 2 boiler operators • 1 kernel station operator • 1 clarification station operator • 1 workshop employee • 2 warehouse workers • 1 IPAL worker • 1 Weighbridge operator • 3 Operator Grading 	PT KAL	-	Direct Interview	27/09/2022	✓	
17	SGT 1 <ul style="list-style-type: none"> • 2 Harvester • 1 road maintenance operator 	PT KAL	-	Direct Interview	28/09/2022	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
	<ul style="list-style-type: none"> • 4 upkeep workers 						
18	SGT 2 <ul style="list-style-type: none"> • 4 Harvester • 6 upkeep workers 	PT KAL	-	Direct Interview	28/09/2022	✓	
19	GST 1 <ul style="list-style-type: none"> • 2 EFB applicator • 6 upkeep workers • 3 harvesters • 2 workers of weeding • 2 loose fruit pickers 	PT KAL	-	Direct Interview	29/09/2022	✓	
20	GST 2 <ul style="list-style-type: none"> • 3 harvesters • 1 Operator LA • 1 operator water management 	PT KAL	-	Direct Interview	29/09/2022		
21	BSL <ul style="list-style-type: none"> • 1 worker of collecting point maintenance • 3 workers of weeding • 2 harvesters 	PT KAL	-	Direct Interview	28/09/2022	✓	
22	LAB <ul style="list-style-type: none"> • 2 loose fruit pickers • 3 harvesters • 4 weeding workers 	PT KAL	-	Direct Interview	28/09/2022	✓	
23	LMS <ul style="list-style-type: none"> • 3 upkeep workers • 3 harvesters • 4 lose fruit picker 	PT KAL		Direct Interview	29/09/2022	✓	
24	Sawit Watch	Jakarta	info@sawitwatch.or.id	Questionnaire via email	09/09/2022		✓
25	WALHI	Jakarta	info@walhi.or.id	Questionnaire via email	09/09/2022		✓
26	AMAN	Jakarta	rumahaman@cbn.net.id	Questionnaire via email	09/09/2022		✓

Appendix 2. Assessment Program		
DATE /	26 September – 1 October 2022	
PLANNED TIME	PROCESSES/ CLAUSES TO BE AUDITED	AUDITOR
Monday, 26 September 2022		
6.30 – 08.10	Jakarta (CGK) → Pontianak (PNK) GA-502	All Auditor
11.10 – 11.55	Pontianak (PNK) → Ketapang (KTG) IW-1348	All Auditor
12.30 – 15.00	Ketapang → PT Kayung Agro Lestari	All Auditor
15.30 – 17.00	Opening Meeting <ul style="list-style-type: none"> • Auditee Speech (Introduction of PIC, Profile of Certified Management Unit). • Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification). 	All Auditor
Tuesday, 27 September 2022		
08.00 – 12.00	<ul style="list-style-type: none"> • Public Consultation <ul style="list-style-type: none"> - Public consultation to Government Agencies of Ketapang by phone - Stakeholder consultation to affected communities surrounding the plantations and previous land owner. - Public consultation with Local Contractor, Cooperative Administrator & Supplier - Interview with internal stakeholders (ex. Bipartite or Labour Union, Gender Committee and Cooperative committee members) • Document review and completing audit checklist. 	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	Field Observation to Kayung Agung Lestari POM Aspect to be verified: <ul style="list-style-type: none"> • Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Despatch CPO) • Inspection to Chemical Storage, Hazardous Waste Storage, Workshop, Fire Control Simulation, POME Pond • Implementation of Employment & Occupational Health & Safety Aspect, Processing Activity. 	All Auditor
16.30 – 17.00	Submission of Audit Progress	All Auditor
Wednesday, 28 September 2022		
08.00 – 12.00	Field Observation to SGT 1 Estate & MBSL Aspect to be verified: <ul style="list-style-type: none"> • Implementation of Legal Aspect (Land Ownership, Legal Boundaries). • Implementation of Environmental and Conservation/HCV management. • Implementation of Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Clinic and Waste Management). • Observation of Workers Facilities (Housing, School, Worship Place). • Implementation of Agronomy Aspect (Harvesting & Transportation) Field Observation to SGT 2 Estate & MLAB Aspect to be verified: <ul style="list-style-type: none"> • Implementation of Legal Aspect (Land Ownership, Legal Boundaries). • Implementation of Environmental and Conservation/HCV management. 	RAH & RWS BYG & SMA

26 September – 1 October 2022		
DATE /	PROCESSES/ CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> ● Implementation of Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Clinic and Waste Management). ● Observation of Workers Facilities (Housing, School, Worship Place). ● Implementation of Agronomy Aspect (Harvesting & Transportation) 	
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	Document Verification <ul style="list-style-type: none"> ● Verification of stakeholder consultation result ● Document review and completing audit checklist. 	All Auditor
16.30 – 17.00	Submission of Audit Progress	All Auditor
Thursday, 29 September 2022		
08.00 – 12.00	Field Observation to GST 1 Estate & MLMS Aspect to be verified: <ul style="list-style-type: none"> ● Implementation of Legal Aspect (Land Ownership, Legal Boundaries). ● Implementation of Environmental and Conservation/HCV management. ● Implementation of Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Clinic and Waste Management). ● Observation of Workers Facilities (Housing, School, Worship Place). ● Implementation of Agronomy Aspect (Harvesting & Transportation) Field Observation to GST-2 Aspect to be verified: <ul style="list-style-type: none"> ● Implementation of Legal Aspect (Land Ownership, Legal Boundaries). ● Implementation of Environmental and Conservation/HCV management. ● Implementation of Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Clinic and Waste Management). ● Observation of Workers Facilities (Housing, School, Worship Place). ● Implementation of Agronomy Aspect (Harvesting & Transportation) 	BYG & SMA RAH & RWS
12.00 – 14.00	<ul style="list-style-type: none"> ● Break 	All Auditor
14.00 – 16.30	Document Verification <ul style="list-style-type: none"> ● Verification of stakeholder consultation result ● Document review and completing audit checklist. 	All Auditor
16.30 – 17.00	Submission of Audit Progress	All Auditor
Friday, 30 September 2022		
08.00 – 12.00	Document Verification <ul style="list-style-type: none"> ● Verification of stakeholder consultation result ● Document review and completing audit checklist. 	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 15.00	Interim Meeting Auditor	All Auditor
15.00 – 17.00	Closing Meeting	All Auditor
Saturday, 01 October 2022		
09.15 – 10.05	Ketapang (KTG) – Pontianak (PNK) IW-1441	All Auditor
14.00 – 15.30	Pontianak (PNK) – Jakarta (CGK) ID-8821	All Auditor