

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

[✓] Recertification

Name of Management Organization : **Bumi Pratama Khatulistiwa Palm Oil Mill, PT Bumi Pratama Khatulistiwa Subsidiary of Wilmar International Ltd**
 Plantation Name : **PT Bumi Pratama Khatulistiwa: Bumi Pratama Khatulistiwa Estate**
 Location : Sungai Tempayan/Mega Timur Village, Sub-District of Sungai Ambawang, Kubu Raya District, Kalimantan Barat Province, Indonesia
 Certificate Code : **MUTU-RSPO/100**
 Date Initial Registration : 18 October 2017
 Date of Last Issue : 19 August 2022 Date of License Issue : 18 October 2022
 Date of Certificate Expiry : 17 October 2027 Date of License Expiry : 17 October 2023

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed By	Approved by
ASA-4 (Remote Audit)	09 to 10 December 2021	Moh Arif Yusni (<i>Lead Auditor</i>), Arief Tajalli, Septian Maulana and Mia Rahmah Qadryani	Harso Yuli Antena	Octo HPN Nainggolan
ASA 4 + Recertificaton (Onsite Audit)	27 June to 01 July 2022	Moh Arif Yusni (Lead Auditor), Yudhi Yuniarto Tallutondok, Radityo Puspanjana and Alexander Sitio		

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA 4 + Recertificaton	19 August 2022

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Figure 1. Location Map of PT. Bumi Pratama Khatulistiwa

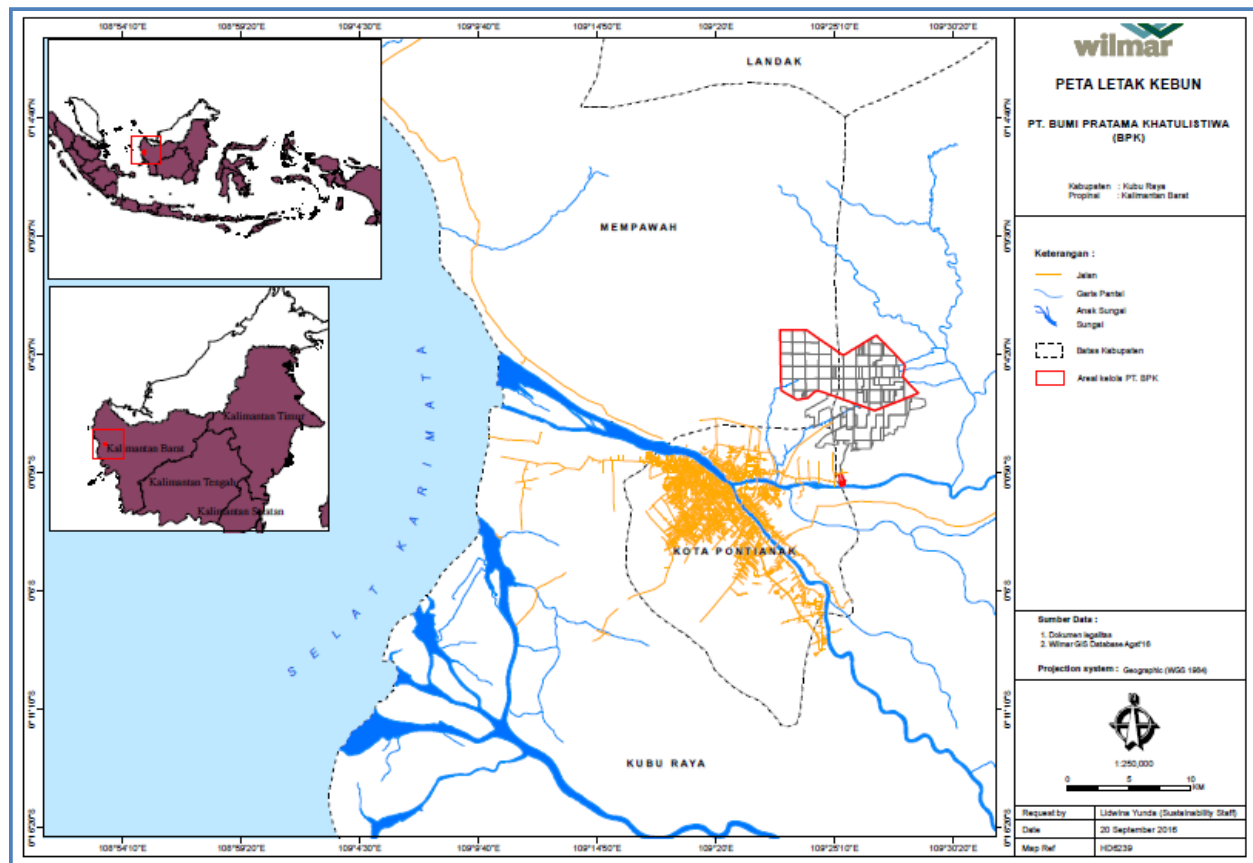
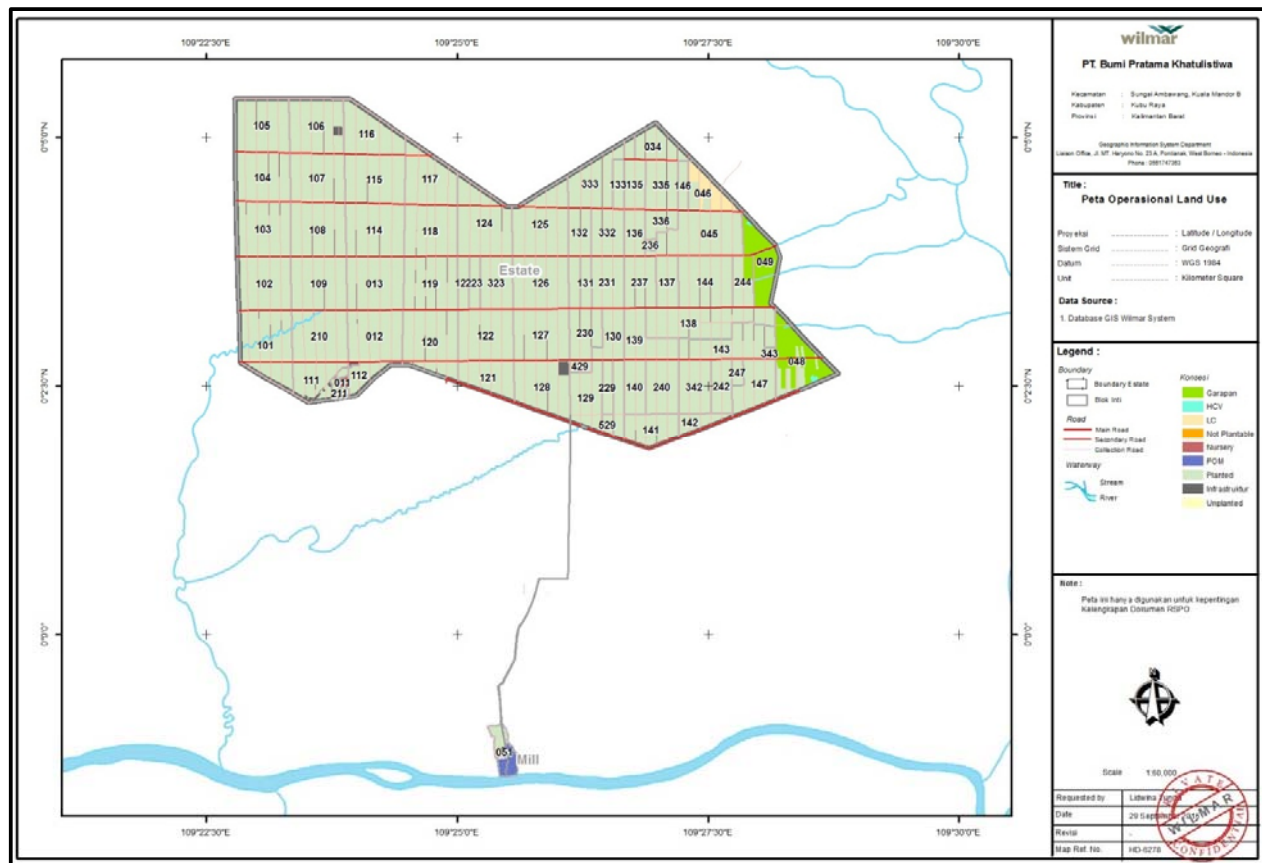


Figure 2. Operational Map of PT. Bumi Pratama Khatulistiwa



Abbreviations Used

AMDAL	:	<i>Analisis Mengenai Dampak Lingkungan/ Environment Impact Assessment</i>
ASA	:	Annual Surveillance Assessment
BCP	:	Buluh Cawang Plantation
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial/ Social Security Agency</i>
BPK	:	Bumi Pratama Khatulistiwa
BPJN	:	<i>Badan Pertanahan Nasional (National Land Agency)</i>
BOD	:	Biological Oxygen Demand
CB	:	Certification Body
CD	:	Community Development
CH	:	Certificate Holder
CPO	:	Crude Palm Oil
COD	:	Chemical Oxygen Demand
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
DPRD	:	Dewan Perwakilan Rakyat Daerah/Regional People's Representative Assembly
DEMNAS	:	Digital Elevation Model Indonesia
EFB	:	Empty Fruit Bunch
EHS	:	Environment Health Safety
EIA	:	Environment Impact Assessment
EMU	:	Ecological Management Unit
EWS	:	Early Warning System
FFB	:	Fresh Fruit Bunch
FGD	:	Forum Group Discussion
HCV	:	High Conservation Value
HCVF	:	High Conservation Value Forest
HGU	:	<i>Hak Guna Usaha / land title</i>
HIRAC	:	Hazard Identification and Risk Assessment Control
HRR	:	Human Resource
GPS	:	Global Positioning System
ILO	:	International Labor Organization
IPM	:	Integrated Pest Management
ISPO	:	Indonesian Sustainable Palm Oil
IUP	:	<i>Izin Usaha Perkebunan / Plantation Business Permit</i>
KER	:	Kernel Extraction Rate
KTU	:	Head Administration
KUD	:	Koperasi Unit Desa / Village Cooperative Unit
K3	:	<i>Keselamatan dan Kesehatan Kerja</i>
LKS	:	<i>Lembaga Kerja Sama / Cooperation Institution</i>
MPA	:	<i>Masyarakat Peduli Api / Fire Care Society</i>
MSDS	:	Material Safety Data Sheet
MUSREMBANG	:	Musyawarah Perencanaan Pembangunan
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
PGA	:	Personal General Fair
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja / OHS Committee</i>
PAUD	:	Pendidikan Anak Usia Dini / Early childhood education programs
PH	:	Power of Hydrogen
PIPIB	:	Indicative Map Determination of Termination of New Permits for Primary Natural Forests and Peatlands
PK	:	Palm Kernel

PKS	:	<i>Pabrik Kelapa Sawit</i>
PSR	:	<i>Perkebunan Sawit Rakyat</i>
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
RKL RPL	:	Environmental Management and Monitoring Plan
RSPO	:	Roundtable and Sustainable Palm Oil
SIA	:	Social Impact Assessment
SOP	:	Standard Operational Procedure
SDC	:	System Development Control
SK	:	Surat Keputusan
UKL-UPL	:	<i>Upaya pengelola lingkungan – upaya pemantauan lingkungan</i>
UPTD	:	<i>Unit Pelaksana Teknis Dinas / Service Technical Implementing Unit</i>
WHO	:	World Health Organization
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE OF THE CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used		
		<ul style="list-style-type: none">• RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.• Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th April 2020.• RSPO Notice to CB on RSPO P&C On-site & Remote Audits, on 24th March 2020.• Contingency RSPO Audit Procedure, on 25th August 2020.	
1.2	Organization Information		
1.2.1	Organization name listed in the certificate	PT BUMI PRATAMA KHATULISTIWA subsidiary of Wilmar International Ltd	
1.2.2	Contact person	Jules Parapat	
1.2.3	Organization address and site address	Head Office: 56 Neil Road Singapore Singapore 088 030 Liaison office: Multivison Tower Lt. 15 Jl. Kuningan Mulya Blok B9, Kuningan, Jakarta, 12980, Indonesia	
1.2.4	Telephone	(62-21) 29380777	
1.2.5	Fax	(62-21) 29380115	
1.2.6	E-mail	jules.parapat@id.wilmar-intl.com	
1.2.7	Web page address	http://www.wilmar-international.com/	
1.2.8	Management Representative who completed the application for certification	Jules Sonny (Certification Lead Indonesia)	
1.2.9	Registered as RSPO member	2-0017-05-000-00 16 August 2005	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Bumi Pratama Khatulistiwa POM and Bumi Pratama Khatulistiwa Estate	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude (S)Longitude (E)
	Bumi Pratama Khatulistiwa POM	Sungai Tempayan/ Mega Timur Village, Sub District of Sungai Ambawang, Kubu Raya District, Province of Kalimantan Barat, Indonesia	S 00° 01' 19"E 109° 25' 28"
1.4.2	Location of Certification Scope of Supply Base		
		Location	Coordinate

	Name of Supply Base			Latitude (S)		Longitude (E)		
	Bumi Pratama Khatulistiwa Estate		Sungai Tempayan/ Mega Timur Village, Sub District of Sungai Ambawang, Kubu Raya District, Province of Kalimantan Barat, Indonesia		N 00° 02' 32"		E 109° 23' 36"	
1.5	Description of Area Statement							
1.5.1	Tenure							
	• State			4,842.95 Ha				
	• Community							
	Total			4,842.95 Ha				
1.5.2	Area Statement							
	Total area			4,842.95 Ha				
	Planted area			4,418.16 Ha				
	Mill, Road and Housing			252.04 Ha				
	HCV			8.53 Ha				
	unplantable area			2.44 Ha				
	Occupation			156.97 Ha				
	Nursery			4.81 Ha				
1.6	Planting Year and Cycles							
1.6.1	Age profile of planting year							
	Planting Year			TOTAL (Ha)				
	2005			160.56				
	2006			25.47				
	2009			582.51				
	2010			1,110.11				
	2011			297.59				
	2012			688.72				
	2013			924.17				
	2014			332.71				
	2015			253.50				
	2016			42.82				
	TOTAL			4,418.16				
1.6.2	New Planting area after January 2010			Ha				
1.6.3	Planting Cycle			2 nd Cycle				
1.7	Description of Mill and Supply Base							
1.7.1	Description of Mill							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	BPK POM	30	181,649.45	33,512.17	18.45	7,289.08	4.01	
	*Production data source from November 2020 – May 2022							
	1.7.2	Description of Certification Scope of Supply Base						
		Total Area		FFB	Yield	Supplied to Mill		

	Name of Estate	(Ha)	Production Area (Ha)	(ton/year)	(ton/ha/year)	FFB (ton/year)	%
	BPK Estate	4,842.95	4,418.16	112,381.23	16.06	112,381.23	100
	TOTAL	4,842.95	4,418.16	112,381.23	16.06	112,381.23	100
	<i>*Production data source from November 2020 – May 2022</i>						
1.7.3	FFB description from other source						
	Name of sources/ Organization	Type of Organization			number of smallholders	Production Area (Ha)	Supplied to Mill FFB (tones/year)
	PT BCP	Wilmar Group (Non certified)					1,200.56
	Mekar Lestari Cooperative	Independent (Non certified)			1000	1952.13	25,658.97
	Tuah Jubata Cooperative	Non certified Associated smallholder of PT BPK			53	96.10	1,829.76
	Plasma BCP	Non certified Associated smallholder of PT BCP					4,601.69
	Blok 051	PT BPK (Non certified)					207.70
	Others suppliers	Non certified independent smallholder					35,870.07
	TOTAL						69,368.75
	<i>*Production data source from November 2020 – May 2022</i>						
	<i>** all FFB. From outgrower are non certified</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 (Ton)		Actual Production November 2020 – May 2022 (MT)	
	FFB Processed			136,000		112,381.23	
	CPO Production			25,461		20,919.77	
	Palm Kernel (PK) Production			5,479		4,556.60	
1.8.2	Product selling						
	Type of selling product			Actual selling product for last year November 2020 – May 2022 (MT)			
	CSPO sold as RSPO certified product			20,597.76			
	CSPK sold as RSPO certified product			4,450.04			
	CSPO sold under another scheme			0			
	CSPK sold under another scheme			0			
	CSPO sold as conventional			0			
	CSPK sold as conventional			0			
1.8.3	Estimate of Certified FFB Claim						
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (tones/year)	Yield (tones/ha/year)		
	BPK	4,842.95	4,418.16	80,000	18.11		
	TOTAL	4,842.95	4,418.16	80,000	18.11		
	<i>*Projected FFB production for 12 months of certificate</i>						
1.8.4	Estimate of Certified Palm Product Claim						

	Name of Mill	Capacity (tones/ hour)	FFB Processed (tones/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tones)	Extraction (%)	Out put (tones)	Extraction (%)	
	BPK	30	80,000	16,000	20.00	3,600	4.50	MB
*Projected CSPO and CSPK production for 12 months of certificate								
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			-				
	Others							
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	Mill	Time Bound Plan						
	Indonesia – Kalimantan Region							
	Mustika Sembuluh 1 POM Mustika Sembuluh POM 2 (PT Mustika Sembuluh)	2010	Mustika Sembuluh 1	2010	Central Kalimantan	Certified		
		2015	Mustika Sembuluh 2	2010	Central Kalimantan	Certified		
			Mustika Sembuluh 3	2010	Central Kalimantan	Certified		
			KUD Bitu Maju Bersama	2014	Central Kalimantan	Certified		
	Kerry Sawit Indonesia 1 POM Kerry Sawit Indonesia 2 POM (PT Kerry Sawit Indonesia)	2011	Kerry Sawit Indonesia 1	2011	Central Kalimantan	Certified		
		2015	Kerry Sawit Indonesia 2	2011	Central Kalimantan	Certified		
			Kerry Sawit Indonesia 3	2011	Central Kalimantan	Certified		
			KUD Karya Bersama	2023	Central Kalimantan	-		
			KUD Sejahtera Bersama	2023	Central Kalimantan			
			KUD Tabiku Makmur	2023	Central Kalimantan			
			KUD Kosudra	2023	Central Kalimantan			
	Bumi Sawit Kencana POM (PT Bumi Sawit Kencana)	2013	Bumi Sawit Kencana 1	2013	Central Kalimantan	Certified		
			Bumi Sawit Kencana 2	2013	Central Kalimantan	Certified		
POM 1 and POM 2 (PT Sarana Titian Permata)	2023	Sarana Titian Permata 1	2023	Central Kalimantan	-			
		Sarana Titian Permata 2	2023	Central Kalimantan	-			
		Sarana Titian Permata 3	2023	Central Kalimantan	-			
Mentaya Sawit Mas POM	2015	Mentaya Sawit Mas 1	2015	Central Kalimantan	Certified			
		Mentaya Sawit Mas 2	2015	Central Kalimantan	Certified			

(PT Mentaya Sawit Mas)		KUD Karya Makmur Pahirangan	2023	Central Kalimantan	-
Rimba Harapan Sakti POM (PT Rimba Harapan Sakti)	2015	Rimba Harapan Sakti 1	2015	Central Kalimantan	Certified
		Rimba Harapan Sakti 2	2015	Central Kalimantan	Certified
		Serba Usaha Makmur Sejahtera Cooperative	2023	Central Kalimantan	-
Karunia Kencana Permaisejati POM (PT Karunia Kencana Permaisejati)	2017	Karunia Kencana Permaisejati 1	2017	Central Kalimantan	Certified
		Karunia Kencana Permaisejati 2	2017	Central Kalimantan	Certified
		Karunia Kencana Permaisejati 3,	2017	Central Kalimantan	Certified
Agro Nusa Investama POM (PT Agro Nusa Investama (Sambas))	2019	Agro Nusa Investama (Sambas) Estate	2019	West Kalimantan	Certified
		KUD Cempaka Biru	2019	West Kalimantan	Certified
		KUD Sentama Lestari	2019	West Kalimantan	Certified
		Sri Maram Estate	2023	West Kalimantan	-
		Sri Maram Cooperative	2023	West Kalimantan	-
		Pusaka Abadi Nan Jaya Cooperative	2023	West Kalimantan	-
		Anugrah Semaro Cooperative	2023	West Kalimantan	-
Bumipratama Khatulistiwa POM (PT Bumi Pratama Khatulistiwa)	2016	Bumi Pratama Khatulistiwa Estate	2016	West Kalimantan	Certified
		PT Buluh Cawang Plantation	2023	West Kalimantan	-
		KUD Tuah Jubata	2023	West Kalimantan	-
Agro Nusa Investama (Landak) POM PT Agronusa Investama - Pahauman	2023	PT Agronusa Investama Pahauman Estate	2023	West Kalimantan	-
		Pratama Procentindo Estate (PT Pratama Procentindo)	2023	West Kalimantan	-
Agro Palindo Sakti POM (PT Agro Palindo Sakti 2)	2023	Agro Palindo Sakti Estate	2023	West Kalimantan	-
		Putra Indotropical Estate (PT Putra Indotropical Estate)	2023	West Kalimantan	-
		Daya Landak Plantation Estate (PT Daya Landak Plantation)	2023	West Kalimantan	-
		Indoresin Putra Mandiri (PT Indoresin Putra Mandiri)	2023	West Kalimantan	-
Indonesia – Sumatera Region					
Pinang Awan POM	2009	Sei Daun	2009	North Sumatera	Certified
		Batang Saponggol	2009	North Sumatera	Certified

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

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

Suburmas POM (PPB Oil Palms Berhad)	2023	Suburmas	2023	Bintulu, Serawak, Malaysia	-
Africa					
BOPP POM, Biase Plantation Limited	2014	Adum Bansa	2014	Western Region, Ghana	Certified
		Scheme Smallholder	2014	Western Region, Ghana	Certified
-	-	Treboum Smallholders	2022	Western Region, Ghana	
Biase Plantation Limited	2020	Calaro	2022	Cross River State, Nigeria	Mill construction complete. Delay due to Covid
Biase Plantation Limited	2022	Calaro extension	2022	Cross River State, Nigeria	To be certified, NPP completed
Biase Plantation Limited	2020	Ibiae	2023	Cross River State, Nigeria	To be certified, NPP completed
Eyop Industries	2021	Ibad	2025	Cross River State, Nigeria	To be certified
Eyop Industries	2020	Kwa Falls	2025	Cross River State, Nigeria	To be certified
Eyop Industries	2021	Oban	2025	Cross River State, Nigeria	To be certified
<p><i>Time bound plan Indonesia update Januari 2021, Malaysia update June 2021, Africa update May 2021</i></p> <p>The revision of time bound plan because there is the change of certification time plan to 2022, 2023, and 2025 for some uncertified management units with reason is still in process to get land use right (Hak Guna Usaha) for some unit in Indonesia, pending NPP assessment for some unit in Africa, and delayed certification due to Covid-19 for some unit in Africa and Malaysia.</p> <p>Regarding the TBP more than 2023, Wilmar has communicated about the TBP to RSPO on 16 July 2021. RSPO response about the TBP is RSPO approved on August 2021 the latest TBP with some notes to take into consideration by Wilmar.</p> <p>Furthermore, the revision of time bound plan because some scheme smallholders has paid all costs relate of develop of scheme smallholder areas so that it has excluded from the time bound plan, its are Mekar Lestar Cooperative (PT Bumi Pratama Khjatulistiwa), KUD Damai Sejahtera (DASTRA) I & II (scheme smallholder under PT AMP Plantation and PT Primatama Mulia Jaya), KSU Mutiara Bosa Sikilang, KUD Permata Sawit Maligi, KUD Rantau Pasaman – Sasak and KUD Kapar (its supply based from PT Gersindo Minang Plantations POM)</p> <p>The revision of time bound plan because two companies (PT Karya Agung Megah Utama & PT Perkebunan Anak Negeri Pasaman) has terminated the management agreement with PT AMP Plantation as stated in the termination agreement letter on 31 May 2019.</p>					
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard				
	<p>In previous onsite assessment (ASA-3) there OFI regarding completing the fulfillment of the RSPO certification for the PT BPK smallholder scheme. During this assessment its has been verify where based on on TBP updated in January 2021 Mekar Lestari Cooperative has been excluded from time bound plan and now became independent smallholders and KUD and Tuah Jubata Cooperative planned to be certified in 2023 as mentioned in the Time Bound Plan.</p>				

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-4 Remote Audit	<p>1. Moh Arif Yusni (Lead Auditor). Indonesian citizen. Bachelor of Agriculture, majoring in Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. During the audit, he verifies Worker Welfare, Legality and Social.</p> <p>2. Arief Tajalli (Auditor). Indonesian citizen, Bachelor of Forest Resources Conservation and Ecotourism, Faculty of Forestry, Bogor Agricultural University. Has been involved as a researcher at a wildlife laboratory, Faculty of Forestry, IPB and Expert staff of Social and Forestry in NGO. The trainings that have been attended include training for participatory mapping and assistive technology by TNC, stakeholder mapping for the management of conservation program by Penabulu, ISO 9001; 2008, ISO 14001; 2004, ISO 17021; 2015, ISO 17065, ISO 19011 and ISPO Auditor training by Mutu Institute and RSPO Auditor Training by Checkmark, also participating in several IHT in the field of environment, BMP, and so on. Has participated in several audit simulation activities related to the sustainable palm oil certification system since 2020 with social, environmental, GHG, and waste management aspect. During this assessment, he verified the Social, Environmental, GHG Aspect and waste management aspect</p> <p>3. 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; Awareness Integrated Management Systems (ISO 9001:2015, ISO 14001:2015, ISO 45001:2018); Basic Fire Fighting; Basic First Aid; Understanding the regulations and technical aspects of environmental management; Training of Immobilization after a venomous snake bite; Awareness ISO 19011:2011; Awareness ISO 17065:2012; Awareness ISO 17021:2015; ISO 14001:2015; and ISO 45001:2018; ISO 9001:2015 Lead Auditor, ISPO Lead Auditor, and RSPO Lead Auditor. In this audit activity was verified Transparency and Best Management Practices Aspect.</p> <p>4. Mia Rahmah Qadryani (Trainee Auditor). Indonesian citizen. Bachelor of Agriculture Majoring in Pest and Plant Disease, Universitas Padjadjaran. The training she has followed namely: ISO 9001, ISO 19011, Awareness ISO 17021, Awareness ISO 17065, Awareness ISO 9001, Awareness ISO 14001, Awareness ISO 45001, and Awareness ISO 19011. She has participated in several audit simulation activities related to the social and worker welfare. During this audit, she verified OHS under supervised by Lead Auditor.</p>
ASA 4 + RC (Onsite Audit)	<p>1. Moh Arif Yusni (Lead Auditor). Indonesian citizen. Bachelor of Agriculture, majoring in Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. During the audit, he verified Legality, Social, TBP and Partial certification.</p> <p>2. Yudhi Yuniarto Tallutondok (Auditor). Indonesian citizen, Bachelor of Fisheries, Padjadjaran University. Have experience of working over three years since 2013 as plantation operations staff in private palm oil plantation company in Indonesia. Training have been followed including Lead Auditor of ISO 9001:2015, Lead Auditor of ISO 14001:2015, ISPO Auditor Training, RSPO P&C Lead Auditor Training Course, RSPO SCC Lead Auditor Course, Social Accountability 8000, Basic Management Development Program Agronomy, Fire Anticipation on Land and Forest, Potential Mapping and Conflict Resolution in Production Forests, Awareness of OHS aspects, ISO 45001:2018, ISO 22000:2009, ISO 19011:2011, ISO 17021:2011, dan ISO 17065:2012. Has participated in audit activities for ISPO and RSPO scheme since 2017 for BMP, OHS, labour, social and legal aspects. In this audit activity performs the assessment of OHS, worker welfare, and SCCS.</p>

3. **Radytio Puspanjana (Auditor).** Indonesian Citizen. Bachelor of agriculture, majoring in Soil Science. Agriculture Faculty. He was working as honorarium Officer at the Riau Province Plantation Agency in the division of huge estate for 1 year. The participated trainings are Survey and Mapping (GIS) Training which was held by National GMT, ISPO auditor training, ISO 9001/2008 auditor training, ISO 14001/2004 auditor training, IHT Geospatial Information System, IHT High Conservation Value, IHT Environmental Impact Assessment, IHT Green House Gas and RSPO Lead Auditor Course by Checkmark Training. Since 2015 has been following many audit as auditor base on Best Management Practice and Environment. During the audit, he verified environment aspect, waste management, GHG and conservation aspect.
4. **Alexander Sitio (Auditor Trainee).** Indonesian citizen, now in the process of studying Doctoral Program at State University of Jakarta in Human Resource Management, Masters in Human Resource Management, University of Jember. Bachelor of Agriculture, Department of Agricultural Socio-Economics, Faculty of Agriculture, University of Lampung. He has 10 years' experience working as operational staff of one of the leading private oil palm plantation companies in Indonesia. The trainings that have been attended include training for ISO 9001; 2008, ISO 14001; 2004, ISO 17021; 2015, ISO 17065, ISO 19011, and participating in several IHT in the field of environment, Best management practices, and OHS. During this assessment has verified best management practices supervised by Lead Auditor.

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

2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-4 Remote Audit	<p>Number of auditors: 3 auditors & 1 auditor trainees</p> <p>Number of days for Remote ASA 4 at site: 2 days</p> <p>Number of working days for Remote ASA 4 at site: 6 Working days.</p>
ASA 4 + RC (Onsite Audit)	<p>Number of auditors: 3 auditor and 1 auditor trainee</p> <p>Number of days for Onsite Audit ASA-4 & recert at site: 4 days</p> <p>Number of working days for Onsite Audit ASA-1.2& Recert at site : 12 Working days</p>
2.2.2	Assessment Process
ASA-4 Remote Audit	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT. Bumi Pratama Khatulistiwa to the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification System for Principles and Criteria and RSPO Independent Smallholder Standards, Endorsed by the RSPO Board of Governors on 12 November 2020.</p> <p>For this section (Remote Audit ASA-4) The assessment was conducted in One method: document review, aiming to observe the sufficiency of types or substances from required documents. Some opportunities for improvement of the results ASA-4 Remote Audit by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA-4 Onsite Audit. Improvement of findings from ASA-3 findings were observed by auditors at this ASA-4 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of Recertification.</p> <p>The opening meeting was held on 09 December 2021 at 08.00 am through a teleconference. As for the participants who attended the opening meeting included the Estate Manager, Mill Manager, Support Team from sustainability department and other relevant staff. while the closing meeting will take place on 10 December 2021 at 15.30 pm. attended by the same participants as the opening meeting. Commonly, the audit activities went smoothly with good support from the unit management. The presentation of documents is presented quite well using email or one drive</p> <p>The assessment program please find Appendix 2</p>
ASA 4 + RC	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT. Bumi Pratama Khatulistiwa to the requirements of :</p>

(Onsite Audit)

1. 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
2. RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020

Additional Documents:

- RSPO Notice to CB on RSPO P&C On-site & Remote Audits, on 24th March 2020
- Contingency RSPO Audit Procedure (This procedure is applicable when force majeure (such as pandemics, natural disasters, civil unrest, etc.) preventing the audit team from conducting field verifications) 25 August 2020
- Contingency RSPO Audit Procedure for RSPO Principles & Criteria and Independent Smallholder Standard (Version 2) Approved by Assurance Standing Committee on 22 October 2021

The scope of certification of PT Bumi Pratama Khatulistiwa consist of one mill (BPK POM) and one (1) estate, namely BPK Estate.

Team of auditor started their trip from Jakarta to Pontianak on 27 June 2022 and continued to site (one and half hour trips). Once arrived, team auditor conducted Opening Meeting in the Meeting Room of BPK POM with the participants who attended the opening meeting included the Group Managers, Estate and Mill Managers, Support Team from Jakarta and other staff of PT Bumi Pratama Khatulistiwa.

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

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

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

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

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

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. Closing meeting was held on 01 July 2022 attended by the same participants as the opening meeting. Management PT BPK accept all the onsite audit results.

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

The assessment program please find Appendix 2.

2.2.3	Locations of Assessment
	<p>The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that observed via video by team auditor are:</p> <p>Bumipratama Khatulistiwa Estate</p> <ul style="list-style-type: none"> • Piezometer logger, Divisi 2 Phase 3 Block 127E, Observation and interview of the management unit to the location of the piezometer according to the recommendation of the Ministry of Environment and Forestry are installed in 12 December 2016 with average rate about 50 cm • Subsidence poles Divisi 2 Phase 3, Block 127E, Observation and interview of the management unit to the location of the piezometer according to the recommendation of the Ministry of Environment and Forestry are installed in 12 December 2016 with average rate about 11.5 cm • Census Ganoderma IPM Block I246 observation and interview of the management unit to the location of ganoderma which is carried out every 2-3 months IPM observations • FFB Harvesting, Divisi 2 Phase 3 Block 127E. Observation and interviews with foreman and harvester related FFB quality, worker welfare OHS, and employment. • Manual weeding in the FFB collection point area, Divisi 2 Phase 4, Block I46 Observation and interviews with foreman and harvester, worker welfare OHS, and employment • Housing Complex of Division 2. Observation to housing complex facilities, such as house condition, clean (for drink) water refill, assembly point, fire extinguisher, prayer building, child care and landfill for domestic waste. • Hazardous Waste Temporary Warehouse. Field observations and interview related hazardous waste management, OHS and environmental aspect. • Workshop. Observation to OSH and environment aspect implementation in the work place. • Chemical mixing room and bathroom. Observation and interview related pesticide mixing area, PPE storage, safety aspect. • Fertilizer storage. Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used. • Place for washing used fertilizer sacks. Field observation and interview related management of ex-fertilizer sacks. • Chemical storage. Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used • Fire Management Store. Observation to the facilities of fire monitoring and management devices. • Fuel or Gasoline Store. Observation to OSH and environment aspect implementation in the work place. • Spare parts and PPE warehouse. Field observation and interview-related management of spare parts and minimum stock of PPE • Lubricant warehouse. Field observation and interview related management of lubricant. • Landfill. Observation for domestic waste management. • HGU stakes and land demarcation No. P114B, No. T118B, No. P128A, and No. P134A. Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency. • HCV Malaya River Riparian Area, Block 101a and 101b. Observation the implementation of management in HCV of riparian area. • HCV Ampening River Riparian Area, Block 49 division II. Observation the implementation of management in HCV on Occupation HCV area. • HCV Parit Kongsir River Riparian Area, Block 49 division II. Observation the implementation of management in HCV on Occupation HCV area. • HCV Parit Gotong Royong River Riparian Area, Block 48 division II. Observation the implementation of

	<p>management in HCV on Occupation HCV area.</p> <ul style="list-style-type: none"> • HCV Parit Tenaga Baru River Riparian Area, Block 48 division II. Observation the implementation of management in HCV on Occupation HCV area. <p>Bumipratama Khatulistiwa Mill</p> <ul style="list-style-type: none"> • Security Post. observation regarding of FFB's receive and verification process and OHS implementation. • Weighbridge. observations regarding FFB's weighing process and OHS implementation • Grading Station. Observation and interview with personel on their understanding towards technical, OHS, License, Labor and environment aspects, as well as facilities provided by the certification unit. • Sterilizer Station. Observation and interview with personel on their understanding towards technical, OHS, License, Labor and environment aspects, as well as facilities provided by the certification unit. • Workshop. Observations and interviews with officers related to work systems, OHS warnings, emergency response systems, MSDS, and safe work practices. • Boiler Station. Observation and interview with operators on their understanding towards technical, OHS, License, Labor and environment aspects, as well as facilities provided by the certification unit. • Engine Room. Observation and interview with Operators on their understanding towards technical, OHS, License, Labor and environment aspects, as well as facilities provided by the certification unit. • Loader Operator. Observation and interview with Operators on their understanding towards technical, OHS, License, Labor and environment aspects, as well as facilities provided by the certification unit. • Hydrant simulation. Observation related emergency response, readiness of fire fighting equipment. • Warehouse Observations made on PPE storage, aspects of worker welfare and aspects of OHS. • Mill Drainage. Observations mill effluent lines, sanitation mill and flow of leaching mill. • WWTP. Observation on WWTP, indication of waste overflow, OHS implementation, and interview with worker about worker welfare, OHS, and company's policies. • Solid Waste. Observation of the management of Solid waste consist of EFB, fiber and shell from the production process of mill. • Empty bunch area. Observation of the management of EFB waste and leaching from EFB. • WTP. Observations and interviews related to water management, recording of water use, health checks, PPE and waste management. • Reservoir. Observations and interviews related to water management and water source.
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
	Will be completed during the onsite audit.
	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Bumipratama Khatulistiwa was held by:</p> <ol style="list-style-type: none"> 1. Public Notification on Website RSPO and PT Mutuagung Lestari on 26 May 2022 2. Public consultation with NGOs (by email) on 22 June 2022 and 28 June 2022 3. Public consultation by phone with government institution 28 June 2022 4. Public consultation meeting with communities including previous landowner 28 June 2022 5. Public consultation meeting with internal stakeholders and contractors 28 - 29 June 2022 <p>Numbers of input from stakeholders were clarified by PT Bumipratama Khatulistiwa as part of this report.</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit (ASA-1.1) will be conducted nine (9) months until twelve (12) months after date of annual license.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has assessed Bumi Pratama Khatulistiwa POM – PT Bumi Pratama Khatulistiwa, Wilmar Intl Ltd operation consisting of one (1) mill and one (1) oil palm estates.

During the assessment, there is three (3) Nonconformities was assigned against RSPO minor Indicators and three (3) opportunities for improvement were identified. Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5.

MUTUAGUNG LESTARI found that Bumi Pratama Khatulistiwa POM – PT Bumi Pratama Khatulistiwa, Wilmar Intl Ltd complied with the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification System for Principles and Criteria and RSPO Independent Smallholder Standards, Endorsed by the RSPO Board of Governors on 12 November 2020.

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1	The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1	<p>PT. Bumipratama Khatulistiwa documents can be opened/ accessed to the public and has been explained in the SOP for providing information to outsiders (transparency) with No. SOP: SOP52/WIP-KB/ (02)/0911 effective October 1, 2015. The procedure explains that the provision of information to the public can be done through a direct interview visit or review of documentation at the head office or representative PT. Bumipratama Khatulistiwa.</p> <p>The mechanism for consultation is listed in Transparency Procedure (SOP47/PR/6/0516) dated May, 1st 2016. The procedure explain that all the information request will be responded by company in 14 days after the incoming letter. The procedure also states the document which can be accessed by stakeholder, such as legal document, OSH plan, environmental and social document, HCV document, detail of complaint and grievance, company's policies and procedure, and so on. The document can be accessed by stakeholders by submit a letter to the company according to the level of importance.</p> <p>The document contains a list of accessible information covering relevant legal, social and environmental aspects related to the sustainability system. This document includes land certificates, OSH plans, environmental and social impact plans and assessments, HCV documentation, pollution prevention and reduction plans, complaints, negotiation procedures, continuous improvement plans, public summary reports on certification assessments, and human rights policies. PT. Bumipratama Khatulistiwa has shown documents related to mandatory reports that are carried out regularly and sent to government agencies, including: Investment Progress Report for the Fourth Quarter of October – December 2021 to the Kubu Raya Regency Agriculture Office in January 2022.</p> <p>Based on interviews with local communities, local contractors, and internal stakeholders, it is known that the company has conducted socialization regarding the procedures for requesting information and has assigned a person in charge to respond to requests for information. Each party also knows the types of general information that can be accessed. It was further explained that publicly accessible documents are specific documents for each operational unit.</p>	
1.1.2	<p>Based on the results of document review and interviews with agencies, such as the Kubu Raya Regency Plantation Service, the Environment Service, Land Office and Manpower Office, it is known that the information presented by the certification unit has been</p>	

presented in an appropriate language and can be accessed by the agency. The unit of certification has provided evidence that the information has been received in an appropriate form and language for the relevant stakeholders for example manpower report, land report as well as environmental report

1.1.3

Records of requests for information are recorded in the logbook of incoming mail records. Recapitulation of incoming and outgoing letters informing the date the letter was received, the sender of the letter, the letter summary, the disposition. On 2022 there were 10 letters requesting funding, outreach activities to companies, appeals, meeting invitations, service offers, approval of extensions, participation in activities. All letters have shown a response form by writing in direct mail. For example, a letter requesting hall assistance from Senior High School in Landak agency June 2022, response letter number 012/PGA-BPK/EXT/VI/2022 dated June 20, 2022 which explains that you have not been able to lend the company's hall due to the COVID-19 pandemic.

1.1.4

The company has procedures related to communication and consultation which are listed in document number: SOP58/WIP-KB/(0)/0915 dated September 1, 2015 concerning Procedures for Open Mechanism for Implementation of Communication and Consultation with the Community. The procedure for implementing the communication and consultation mechanism with the community must comply with the following provisions:

- Analyze proposals/aspirations/complaints or even community demands that require immediate discussion and handling
- Determine the company policies that will be taken in addressing the matters mentioned above
- Coordinate with the community to schedule a meeting to open lines of communication and consultation as soon as possible
- Delivering company policies to the public and conducting joint discussions to maintain the interests of both parties.
- Analyze and draw conclusions on the material discussed with the community and then submit it to company management.
- Conduct socialization and certain steps to follow up on the results of discussions with the community.

The company has shown documents related to communication and consultation socialization, which were shown by the company, the minutes of socialization of the submission of complaints by stakeholders on 12 July 2021 to 36 participants from the community and public relations.

The person responsible for communication and consultation with stakeholders is the CSR and public relations. Job descriptions are available for the CSR and public relations sections, including building relationships with local leaders and communities.

Based on the results of interviews with several stakeholders, for example from villages, cooperatives, government agencies, and contractors, the implementation of consultation and communication has been going well and the company responded quickly.

1.1.5

List of stakeholder is presented in document of "*Daftar Stakeholder* PT BPK for period 2022, summarized as follows:

- Internal stakeholders: Estate Managers; Estate Administration Heads (KTU); Safety, Health and Environment Officer; Company doctor, Paramedics, Emergency Team; Head of Security, Gender Committee, Service Coordinator and Human Resources Regional (total 23 contacts).
- Smallholder Cooperative Committee members (total 16 contacts).
- Community representatives consist of Head of Sub District (*Camat*) from Sungai Ambawang Kubu Raya District; Village representatives from Kuala Mandor B, Mega Timur, Sungai Enau and Malaya Village (total 19 contacts).
- Government agencies such as Head of Kubu Raya District (*Bupati*), Head of Agencies, Head of Police Resort with his staff and Military Office (total 19 contacts).
- Insurance and Hospital (2 contacts).
- Labour Union and gender committee representatives (total 4 contacts).
- National and local Journalists (total 6 contacts).
- Contractors and FFB Suppliers (12 contacts).
- Journalist (8 contact).
- non-governmental organization (1 contact).

Based on the list, address and contact number of stakeholder representatives were available.

Status: Comply

1.2

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

1.2.1

The certification unit has code of conduct document for all operational activities that listed on Document No 003/DIR-KP/IV/2016. Code of conduct explain Code of Conduct Principles, Conflict of Interest, Bribery and Illegal or Unethical Practices, Entertainment and Gifts, Misuse of Position, Insider Trading, Confidentiality, Restriction on Solicitation, Media Relations, Trade Union, Political and Social Activities, Installation of Illegal Computer Software, Anti Money Laundering, Trade Compliance & Export Controls and Sanctions, and Commitment to Human Rights.

The certification unit shows documentation of socialization of policies and regulations that apply in unit certification to relevant stakeholders, some examples include:

- Minutes of socialization on 24 January 2022 regarding Human Rights Policy to contractors and employees attended by 39 employees.
- Socialization of Quality Policy, OHS, and Human Rights on 10 February 2022 which was attended by 36 employees.

The certification unit shows examples of the implementation of the code of business ethics in terms of recruitment and labor contracts, for example: job vacancy information on June 6, 2022 which was submitted through each village representative to be further submitted to each of its residents, the selection process for prospective employees was carried out for 3 days from on 9-11 June 2022, and the announcement of the results of the recruitment of new employees on 13 June 2022 which was then followed by the preparation and signing of a work agreement. The certification unit can show an example of documentation of new hires for 2022 as follows:

- Job application letter for prospective employees with the initials MD.
- Employee Identity Document with the initials MD.
- Identity Card (*KTP*) with NIK 6108102906930001.
- Work Agreement Letter No. HV-BPK/II/2022 dated 13 June 2022 between the Estate Manager of PT BPK and the employee initials MD for the work of harvesting.

1.2.2

The system to monitor compliance with ethical policies is carried out through monitoring complaints. The certification unit has grievance procedures such as procedure of grievances or complaint which presented in document No. SOP 42/HRD/0/0609 to submit complaints including complaints of violations of the code of ethics.

Based on the interviews with mill and estate workers known that information was obtained that there was no charge to employees or deductions to employee wages. In addition, the average employee who enters the certification unit is done individually without going through the agent/ labor supplier.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

2.1

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

2.1.1

The unit of certification can demonstrate compliance with these laws and regulations, in the following aspect

1. Location permission

PT Bumi Pratama Khatulistiwa has obtained a Location Permit:

- Decree of the Head of the Pontianak Regency Land Office No. 400/05-IL/1996 dated 05 June 1996 regarding the first amendment to the Location Permit Decree No. 400/26-IL/1995 dated December 11, 1995 for the purposes of Oil Palm Plantation Limited Liability Company (PT) Bumi Pratama Khatulistiwa with a Local Permit Area of ± 13,605 Ha located in Sungai Ambawang District and Sengah Temila District, Pontianak Regency valid until 11 December 1998. Initially the location permit was intended for the development of Hybrid Coconut commodity with Papaya and Papaya intercropping. Pineapple on a land area of 13,605 (Location Permit No. 400/26-IL/1995).

2. Spatial Suitability

The location permit is based on the Decree of the Head of the Pontianak Regency Land Office No. 400/05-IL/1996 dated June 5, 1996 regarding the first amendment to the Location Permit No. 400/26-IL/1995 dated December 11, 1995 for the purposes of Oil Palm

Plantation on behalf of Limited Liability Company (PT) Bumi Pratama Khatulistiwa with a Location Permit Area of $\pm 13,605$ Ha. In the document it has been explained that the area in question is State land with the status of Other Use Areas.

Based on the integration map between the West Kalimantan Provincial Spatial Plan (RTRWP) and the Consensus Forest Use Plan (TGHK), the location of the plantation project development scope is 6,814.96 ha and the 40-ha factory location of PT Bumi Pratama Khatulistiwa is entirely included in the dry land agricultural function. (PLK) and Wetland Agriculture (PLB). This is also described in SK HGU No. 18/HGU/BPN/96 consideration of point at which state that the land for which *Hak Guna Usaha* (HGU) is applied for an area of 4,814.96 Ha is State land which is an Other Use Area (APL).

3. Plantation Business Permit

The company has shown evidence of progress on the addition/revision of the IUP as follows:

- The company has a Plantation Business Registration Letter No. 448/Menhutbun-VII/2000 dated April 25, 2000, covering an area of 4,814.96 Ha with a capacity of 60 tons of FFB/hour.
- Request for Revision of IUP on behalf of PT BPK to the Regent of Kubu Raya Cq Head of the Forestry Plantation and Mining Service of Kubu Raya Regency No. 032/BPK-BM/IUP/IX/2020 on 28 September 2020 stated that based on HGU No. 59 and HGB No. 00078, 00079 and 00080, the total area of PT BPK's oil palm plantation and processing industry is $\pm 4,842.95$ Ha. Related to this, the company applied for a revision of the IUP with documents attached to the application such as SPUP No. 448/Menhutbun-VII/2020 dated April 25, 2020, HGU No. 59 and HGB No. No.00078, 00079 and 00080.
- Letter of Assignment No. 094/305/Disbun-C2/2020 dated 30 September 2020 from the Kubu Raya Regency Plantation Service to monitor the development of PT BPK's Oil Palm Plantation on 01 October 2020.
- Minutes of the handover from PT BPK to the Kubu Raya Regency Investment and One-Stop Service Office on October 20, 2020 regarding the Request for Revision of PT BPK's Plantation Business Permit.

Furthermore, in previous assessment there is opportunity for improvement regarding process of completing the revised *Izin Usaha Perkebunan* (IUP), this OFI has been follow up by the company where PT BPK has been obtained Bussines Permit based on Decree of the Head of the Investment Service and One Stop Service Number 07 of 2021 dated January 20, 2021 concerning the PT Bumi Pratama Khatulistiwa Plantation Business Permit, with detail:

- Commodity: Palm Oil Plantation
- Area: 4,842.95 Ha
- Location: Subdistrict of Kuala Mandor C and Sungai Ambawang, Regency of Kubu Raya
- Mill Capacity 60 MT/hours

4. Plantation Business Progress Report

Company PT. Bumipratama Khatulistiwa has shown documents related to mandatory reports that are carried out regularly and sent to government agencies, including: Report on the Progress of Investment Implementation Quarter IV October – December 2021 to the Kubu Raya Regency Agriculture Office in January 2022.

5. Company HGU and HGB

The company has shown proof of land ownership including:

- Right to Cultivate on behalf of PT Bumi Pratama Khatulistiwa covering an area of 4,814.96 Ha in Sungai Ambawang District, Pontianak Regency in accordance with the Decree of the State Minister of Agrarian Affairs/Head of BPN No. 18/HGU/BPN/96 dated 31 May 1996. The HGU is valid for 30 years until 21 July 2026. Based on the HGU Decree, HGU Certificate No. 59 of 1996 dated July 29, 1996 covering an area of 4,814.96 Ha for the purpose of developing an oil palm plantation.
- Certificate of Building Use Rights No. 00079 with a date of issuance (with a validity period of 30 years, namely March 11, 2050), based on registration based on the Decree of the Head of the Regional Office of the National Land Agency of West Kalimantan Province (No. 07/HGB/BPN.61/2020) dated March 11, 2020) and Letter of Measurement No. 03597/Mega Timur/2020 dated June 18, 2020 is an area of 106,700m² (10.67 Ha).
- Certificate of Building Use Rights No. 00080 with an issue date of July 3, 2020 (with a validity period of 30 years, namely March 11, 2050), based on registration based on the Decree of the Head of the Regional Office of the National Land Agency of West Kalimantan Province (No. 06/HGB/BPN.61/2020) dated March 11 2020) and Letter of Measurement No. 03595/Mega Timur/2020 dated June 12, 2020 is an area of 128,900m² (12.89 Ha).
- Certificate of Building Use Rights No. 00078 with an issue date of July 2, 2020 (with a validity period of 30 years, namely March 11, 2050), based on registration based on the Decree of the Head of the Regional Office of the National Land Agency of West Kalimantan

Province (No. 05/HGB/BPN.61/2020) dated March 11 2020) and Letter of Measurement No. 03596/Mega Timur/2020 dated June 18, 2020 is an area of 4.427 Ha.

Based on the data above, the total area of PT BPK becomes 4842.947 Ha (4842.95 Ha) with details:

- HGU area of 4,814.96 Ha
- HGB (No. 00078) covering an area of 4.427 Ha
- HGB (No. 00079) covering an area of 10.67 Ha
- HGB (No. 00080) covering an area of 12.89 Ha

6. Worker Welfare Aspect

- Employee wages have been referred to the Decree of the Governor of West Kalimantan No. 1468/DISNAKERTRANS/2021 concerning the 2022 Regency Minimum Wage. The decree stipulated the minimum wage for plantation and the processing sector with a value of IDR 2,467,630.
- The certification unit has implemented a structure and scale of employee wages based on years of service and work assessment of each employee.
- Company Regulation for the period 2021-2023 which has been ratified based on the Decree of the Head of the Manpower and Transmigration Office of Kubu Raya Regency No. 169 Year 2021 dated September 10, 2021.

7. OHS Aspect

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

- The certification unit has 2 welder who already has a license, for example license No. S.2036/JL/WELDER/PNK3/XII/2021 with a validity period of up to December 13, 2024.
- The certification unit has 3 static crane operators class III who already have a license, for example the license No. P.15.39264-OPK3-OC/PAA/IV/2021 with a validity period of up to April 13, 2026.
- The certification unit has an operator of energy and production equipment with license number 6584/MP/PTP/V/2019 with a validity period of up to May 21, 2024.
- The certification unit has 2 boiler operators class II who already have a license, for example license number 11239.OPK3-PUBT-B.II/V/2019 with a validity period of up to May 20, 2024.
- The certification unit has 5 boiler operators class I who already have a license, for example license number 11744.OPK3-PUBT-B.I/XII/2021 with a validity period of up to December 31, 2026.

8. Environmental Aspect

- Document AMDAL 2004 which has received approval from the Pontianak Regency AMDAL Commission and the Pontianak Regent in accordance with Letter No. 660.1/024.a/IV/DLHESDM-B dated April 8, 2004 with an area of 6,814.96 Ha consisting of 4,814.96 Ha for Core Company Estate and 2,000 Ha for Plasma plantations and 40 Ha for POM. The capacity of the mill which is the scope of the study is 30 tons of FFB/hour which is planned to be built outside the plantation area.
- Permit for Storage of Hazardous and Toxic Waste for the Scope of Estate based on Document Number 660.1/08/BA-TPSLB3/DLH-C dated August 24, 2020 in the form of a recommendation from PT BPK to obtain an extension of the permit from the Environmental Service of Kubu Raya Regency, as well as the OSS System issued on 31 August 2020 by the Regent of Kubu Raya, West Kalimantan Province.
- Permit for Storage of Hazardous and Toxic Waste for the Scope of mill based on document Number 660.1/10/BA-TPSLB3/DLH-C dated 20 May 2021 in the form of a recommendation from PT BPK to obtain a permit extension from the Kubu Raya Regency Environmental Service, as well as the OSS System issued on June 3, 2021 by the Regent of Kubu Raya, West Kalimantan Province.
- Surface Water Intake Permit based on the Decree of the Minister of Public Works and Public Housing concerning the Granting of Water Resources Concession Permit Number 516/KPTS/M/2021 dated 28 April 2021.
- Wastewater Disposal Permit to the Water Agency Number 503/008/DPMPSTP-E/IPLC/2017 dated November 23, 2017 issued by the Environmental Service of Kubu Raya Regency, with a validity period of up to 5 years.

9. BMP Aspect

- The management unit already owns and uses pesticides registered with the Pesticide Commission.
- IPM activities according to the best IPM guidelines.
- The pesticide storage area is equipped with the chemical hazardous symbol, ventilation, a channel to accommodate pesticide spills,

eyewash and shower, fire extinguisher, and a first aid kit.

2.1.2

The procedure of legal requirement which presented in document FRM 02/SOP 02/WIP-KB/0610 dated 1 May 2016. The procedure explains personnel who have a responsibility to update the regulation and law, identify and inventory, evaluation, and monitor Information of regulations from national, provincial, and district regulatory bodies and renewal any changes to prevailing laws and regulations, and monitoring of expired regulations/licenses.

the results of document verification, the company can show a list of laws and regulations for PT Bumi Pratama Khatulistiwa which explains the aspects, laws, and clauses of these regulations, namely:

- Plantation aspect, the latest updated on 01 May 2022 consisting of 74 regulations
- Worker welfare aspect, the latest updated on 01 May 2022, consisting of 79 regulations
- OSH Aspect, the latest updated on 01 May 2022, consisting of 56 regulations
- Environmental aspect, the latest updated on 01 May 2022, consisting of 123 regulations

The company also has personnel responsible for identifying legal requirements and ensuring compliance. Companies can also show a complete list of international, national, sub-national, and provincial laws that detail specific requirements for mill and plantation operations for each aspect such as employment, environment, legality, and Best Management Practices. All relevant sections of the law have been identified and linked to activities within the unit of certification. The company carries out an internal RSPO audit regularly every year with the last internal audit carried out on 22 March 2023, at which time the audit is carried out in conjunction with inspections related to compliance with the relevant regulations. In relation to third-party contracts, the certification unit has also ensured that there is an evaluation of legal compliance for all contracts with third parties carried out according to the principle of continuous improvement. This can be proven from the evidence of socialization to contractors as well as the application of standards and procedures for third parties who enter the scope of the company's area.

2.1.3

Monitoring of legal boundaries ruled in the procedure maintenance and monitoring of HGU poles number 001/SOP/GIS/2014 on July 1, 2014, the monitoring and maintenance were conducted at least every year by Surveyor and Bina Mitra. Based on the documents review there are 68 boundaries poles in PT BPK

As implementation of the procedure, the company can present monitoring boundaries pole HGU PT Bumi Pratama Khatulistiwa. Monitoring was carried out by the GIS department with the last monitoring in May 2022, based on monitoring all monitoring is available and in good condition.

Based on observation to in poles sample (Poles No. P114B, No. T118B, No. P128A, and No. P134A), it was known that BPN poles were satisfactory maintained and easy to identify. Furthermore, coordinates marked by Auditor through application GPS-Map were matched with coordinates settled by BPN

Status: Comply

2.2

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

2.2.1

List of contractors is presented in document "*Daftar Kontraktor dan Pemasok TBS*" that updated on 03 January 2022, which informs stakeholder category, name of PIC, relation, address and contact number. Currently, unit of certification has 12 contractors/ suppliers. Based on document verification show that the number of FFB supplier and contractor is in accordance with the list of stakeholders where the number of FFB supplier and contractor are 12 stakeholders which also includes hazardous waste transporting and machine maintenance contractors at the mill.

2.2.2

Based on verification to several work agreements, for example with FFB suppliers, such as through agreement No. 001/SPK-BPK Sei.Tempayan/PB-TBS/II/2022 dated 02 January 2022 with CV Ingat Budi and Agreement No. 002/SPK/PT.BPK/III/2022 dated 07 March 2021 with CV Cipta Sejahtera Abadi, it is known that the work agreement has covered several things, among others

- Implementation of sustainability certification system.
- Personal protective equipments (PPE).

- Prohibition on hazardous material disposal.
- Manpower protection.
- Law pursuance and human rights.

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

Monitoring of law or regulation pursuance by contractors is presented in document of evaluation of contractor and form of evaluation and contractor. Sighted contractors evaluation dated 10 January 2022.

2.2.3

Based on verification to several work agreements with FFB suppliers, for example through agreement No. 001/SPK-BPK Sei.Tempayan/PB-TBS/II/2022 dated 02 January 2022 with CV Ingat Budi and Agreement No. 002/SPK/PT.BPK/II/2022 dated 07 March 2021 with CV Cipta Sejahtera Abadi, it was known that clauses of disallowing child, forced and trafficked labor has been explained in the agreement

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

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

Status: Comply

2.3

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

2.3.1

Records of the origins of all FFB Suppliers are available on computerized system at BPK POM. BPK POM has record the origins of all third-party sourced FFB. The result of document verifications, interview with managements it was known the direct supplier of PT BPK are estate or smallholders under subsidiary of Wilmar. Direct supplier of PT BPK is:

- Own Estate PT BPK
- Blok 051 PT BPK
- KUD Tuah Jabata → Smallholder scheme of PT BPK
- PT Buluh Cawang Plantation → Associate Outgrower / Wilmar
- Plasma IV PT Buluh Cawang Plantation → Associate Outgrower / Wilmar
- PT BCP B Sukma → Associate Outgrower / Wilmar
- PT BCP Mentibar Cemerlang → Associate Outgrower / Wilmar
- PT BCP B Sempurna → Associate Outgrower / Wilmar

2.3.2

The company has list of FFB's indirect suppliers namely:

- CV Bintang Borneo
- CV Ingat Budi
- PT Gusma Sukses Makmur
- CV Mekar Jaya
- KUD Mekar Lestari (Plasma 1 s/d3)

During the audit process, evidence of legal compliance from each supplier can be shown, for example on behalf of PT Gusman Sukses Makmur with Legal and traceability document presented are:

- Work agreement No 001/SPK-BPK Sei Tempayan / PB-TBS/II/2021 dated 01 January 2021 about FFB Trading. In the work agreement described if FFB are sourced from plantation owned by PT Gusman Sukses Makmur and Partnership of PT Gusman Sukses Makmur.

The entire FFB are not from theft or crime, forest area or illegal source

- Deed of incorporation of PT Gusma Sukses Makmur No 8-05 dated 20 January 2020
- Address: Ruko Komp, Water Front City No 42, Desa Kapur, Sungai Raya – Kubu Raya 783.91
- Location coordinate for example (X 109.43396 and (Y) 031946
- Number of Supplier: 162 persons
- Legal Document: Land register certificate and Freehold Tittle
- Total Area: 264.39 Ha

To ensure all FFB from agent / indirect suppliers or middleman are from legal source the unit of certification can presented SOP FFB Acceptance method Cara *Penerimaan TBS* (SOP/BPK-SRT/002/0621 dated June 2019)

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 Certification has a long-term plan document contained in the Projection/Production Budget for the period 2022 – 2025 which contains:

- Production costs, FFB production, total FFB processed, OER, KER, CPO production, PK production, sales of FFB itself to related partners, FFB price (Rp/mt), CPO price (Rp/mt), PK price (Rp/ mt), CPO income, PK income, Gross operating profit, Profit after and before tax, total operating cash surplus (deficit), Taxation, financial services and cumulative cash after financial services).
- Area Statement (Mature Park, immature, total cultivable area, unplanted group, total area, FFB production).
- Local smallholder management planning
- Plant and Plantation Costs (maintenance, harvesting and total costs).
- Plantation Development Costs.
- Plantation and Factory Capital Expenditure Costs (processing costs, direct labor, factory overhead and indirect labor, general and admin).
- Sustainability Implementation Costs (Environmental, Social, Occupational Health and Safety and Other Related Compliance Costs.
- Plans for cooperation in the management of smallholders/ cooperatives.

Projection/ Budget production PT. Bumipratama Khatulistiwa POM and Estate 2021-2025

No	Parameter	2021 (Ton)	2022 (Ton)	2023 (Ton)	2024 (Ton)	2025 (Ton)
1.	Planted Area	4,438	4,438	4,438	4,438	4,438
2.	FFB estate	84,800	91,400	100,100	108,800	114,100
3.	FFB Plasma	23,500	14,000	6,900	6,300	10,500
4.	FFB outside	68,750	72,250	75,850	79,600	83,500
	Total FFB	177,050	177,650	182,850	194,700	208,100
6.	OER %	20.04	20.04	20.04	20.04	20.04
7.	KER %	4.5	4.5	4.5	4.5	4.5
8.	CPO	35,481	35,601	36,643	39,018	41,703
9.	PKO	7,967	7,994	8,228	8,762	9,365

Companies can show long-term projections for the period 2021 – 2025 which inform: production projections (FFB, CPO, PK); Processed FFB projections; extraction projection; cost projections (Estate and Mill).

3.1.2

The certification unit has a replanting program for the next 5 year projections described in the 2021-2025 budget report prepared by the estate manager, coordinator of System Development Control and Assistant General Manager.

No	Description	2021 (Ha)	2022 (Ha)	2023 (Ha)	2024 (Ha)	2025 (Ha)
1.	Own Estate area	-	-	200.30	39.82	-
2.	Plasma Area	-	-	815.09	867.49	297.40
3.	Total Area	-	-	1,015.39	907.31	297.40

Based on document, the replanting plan for the total Area will begin in 2023 with an area of 1,015.39 Ha, in 2024 an area of 907.31 Ha, in 2025 an area of 297.40 Ha. The replanting program is reviewed annually on management review activities, the last review was on.

3.1.3

The company can show a recording of the minutes of management review activities carried out in the Division I Office Meeting Room on January 19, 2021, attended by 21 participants. In summary, the matters discussed in the management review activities include:

- EHS Department Evaluation
- Evaluation of KTU Administration
- CSR Evaluation at Bina Mitra
- Security Oversight Evaluation
- Evaluation of the Department of Personal General Affairs
- Workshop Evaluation
- Environmental Impact
- Forest/land fire prevention
- Hazardous Waste Management
- Use of Chemicals
- Housing and Building Environmental Conditions
- Improved RSPO internal audit results
- Peat Best Management Practice
- Evaluation of Harvesting Activities
- Evaluation of Spraying Activities
- Evaluation of Pest and Disease Control Activities

Based on interview information and document review with management representatives (plantation manager), long-term plans have been well planned with top management (company directors) and are sufficient or appropriate as management plans to achieve long-term economic and financial goals.

Status: Comply

3.2

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

3.2.1

The certification unit has conducted an internal RSPO audit conducted on Bumipratama Khatulistiwa mill on March 24, 2022, and Bumipratama Khatulistiwa Estate on March 22, 2022.

Bumipratama Khatulistiwa Mill with the findings of the RSPO internal audit there are 8 major findings status and 7 minor findings status and has been verified completed on 6 April 2022. Bumipratama Khatulistiwa Estate with RSPO internal audit findings there are 4 major findings status and 5 minor findings status and has been verified completed on 22 June 2022.

The company conducted an internal audit of PICA (Problem Identification Corrective Action) of SDC Finding at Bumipratama Khatulistiwa Mill will be held on April 12-23 2021 and for 2022 it is planned for October 10, 2022. Bumipratama Khatulistiwa Estate was carried out by PICA of SDC on March 24 – April 6, 2022 with 8 findings and the status has been verified for completion in May 2022.

The company has carried out a management review on May 20, 2022. Some examples in the discussion include: related to the absence of a management review implementation that discusses the results of internal audits which include SCCS, handling stakeholder complaints, customer feedback, operational performance, quality/quantity conformity production and opportunities for improvement.. Based on the results of the document review, it is also known that the company no longer uses pesticides with the active ingredient paraquat and implements integrated pest control.

Based on document verification show that the certification unit still employs employees with casual daily status where there are casual daily workers who have worked for more than 10 years. related to wages, casual workers have received wages in accordance with the provisions of the government (minimum wages) based on daily basis. According to labour regulations, casual daily workers do not work more than 20 days and are paid based on units of output with daily wages. Based on this, workers do not get the minimum wage due to limited working days. Certification unit in this case are encouraged to provide equal employment opportunities for all employees, for example in terms of employee status or income. **OFI**

Environment

The company has implemented commitments to reduce environmental impact to regular action plans. As an example:

- Management and monitoring of factory effluent quality. Through WWTP pond management, wastewater quality testing, air quality management and monitoring, road maintenance, air quality testing, groundwater management and monitoring, groundwater quality testing and reporting to environmental services
- Hazardous waste management. Storing hazardous waste in permitted hazardous waste warehouse, managing and monitoring hazardous waste.
- In managing Green House Gas (GHG), the company has implemented a zero burning policy, utilizing shells and fiber as renewable energy. Regular engine maintenance, regular emission quality tests and GHG calculations using the RSPO palm GHG calculator.

3.2.2

Unit of certification shows RSPO metric template during the time of audit. As checked properly, it was known that all data provided were match with actual situation. Based on document verification, for The RSPO metric template known annual data 12-month periods use (January to December 2021) for schedule reporting annual data social and environmental, included monitoring data of water consumption, management dan monitoring HCV. The annual report document using the RSPO metric template format that has been provided to the auditor team at the time of the assessment.

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

Status : Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

Unit Certification has procedure "Standard Operating Procedure" For Oil Palm until 2021-2022 has 64 Procedure, with 6 Standar operating Procedure Agronomy, and has 26 Standards Work Safety Procedures and Emergency Response Procedures.

The document contains about the procedure for pre-development survey, assessment and planting, nurseries, land clearing and preparation, legume cover crop, oil palm planting, upkeep and maintenance of oil palm, harvesting of Fresh Fruit Bunches, plant protection, pest, and disease management, oil palm to oil palm replanting, EFB mulching, quantitative agro management system (QAMS) and oil palm thinning technique.

Meanwhile, with regard to the processing in the mill, the company has the document of processing job execution procedures (SOP of mills). The SOP consists of: Volume I (FFB Grading, Laboratory Sampling and testing procedures, general and security, weighbridge, loading ramp, sterilization station, threshing station, pressing station, clarification station, kernel recovery station and boiler house). Volume II consists of power plant, water treatment plant, waste management, land application and solid waste, EFB utilization, workshops, electricity system, quality, storage and delivery of CPO and kernel, laboratory, procedure for producing CPO with low FFA.

Based on information from field visits and document review that operating SOP procedures are properly documented, implemented and monitored consistently.

3.3.2

The certification unit has consistently implemented procedures, the company has a supervisory supervision mechanism that is carried out regularly through internal audit activities

Internal audits are conducted twice a year, the scope of which includes plantation operations and mill operations. Several types of internal audits that are carried out routinely by the company include:

- QAMS audit (Quantitative Agronomic Management System). It is carried out regularly every two weeks by the Ecological Management Unit (EMU) Department to monitor best management practice activities. Some of the findings were related to loose fruit rot in pathways and crop circles.
- SDC Audit (System Development Control) which aims to audit plantation administration. Done every 6 months. All internal audit non-compliance records have been corrected and verified by the company. In addition, there is an internal audit from the company to check and monitor contractor performance regarding compliance with company procedures.
- Harvest inspection activities to maintain harvest quality, namely for indicators of loose fruit, OHS, pruning (under/over), and red fruit by the EMU department.
- Inspection activities for EWS detection and census for IPM every week.

The certification unit has documented plantation and mill operational reports such as daily reports, supervisors' workbooks, etc. Field visits to factories and estates showed that the unit had documented daily production report activities which were documented using a computerized reporting system.

3.3.3

The unit of certification has implemented a mechanism to check the implementation of procedures consistently, among others:

- RSPO internal audit was conducted on Bumipratama Khatulistiwa Mill on March 24, 2022 and Bumipratama Khatulistiwa Estate on March 22, 2022. Bumipratama Khatulistiwa Mill with RSPO internal audit findings contained 8 major findings status and 7 minor findings status and was verified completed on 6 April 2022. Bumipratama Khatulistiwa Estate with RSPO internal audit findings there are 4 major findings status and 5 minor findings status and has been verified completed on 22 June 2022.
- The company conducted an internal audit of PICA (Problem Identification Corrective Action) of SDC Finding at Bumipratama Khatulistiwa Mill carried out on April 12-23 2021 and for 2022 it is planned to be on October 10, 2022. Bumipratama Khatulistiwa Estate PICA of SDC will be conducted on March 24 – April 6 2022 with 8 findings and status verified completed by May 2022.
- The company has conducted a management review of Bumipratama Khatulistiwa Mill on May 20, 2022 at the Bumipratama Khatulistiwa Mill Office with a total of 12 participants. Some examples in the discussion include: related to the unavailability of the implementation of a management review that discusses the results of the internal audit which includes SCCS, handling stakeholder complaints, / customer feedback, operational performance, conformity of quality / quantity of production and opportunities for improvement and status has been verified completed
- The company has conducted a management review of Bumipratama Khatulistiwa Estate on January 26, 2022 in the meeting room of the Division 1 Office with a total of 28 participants. Some examples in the discussion include: related to the unavailability of risk assessment on security work activities, night watch, laboratory, water pump, water treatment plan and fire tower and opportunities for repairs, there is no evidence of SIA management/monitoring plan involving affected parties and the status has been verified complete.
- Harvest inspection activities to maintain harvest quality, namely for indicators of loose fruit, OHS, pruning (under/over), and red fruit by the EMU department.
- Inspection activities for EWS detection and census for IPM every week.

The unit of certification has documented plantation and mill operational reports such as daily reports, supervisor workbooks, etc. Field visits to mills and plantations showed that the unit had documented all daily activities in daily production reports which were documented using a computerized reporting system.

Status: Comply

3.4

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

3.4.1

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

Environmental Impact Assessment (EIA)

The company already has an environmental impact analysis contained in several documents, including:

- The 2004 AMDAL document which has received approval from the Pontianak Regency AMDAL Commission and the Pontianak Regent in accordance with Letter No. 660.1/024.a/IV/DLHESDM-B dated April 8, 2004 with an area of 6,814.96 Ha consisting of 4,814.96 Ha for Core Company Estate and 2,000 Ha for Plasma plantations and 40 Ha for POM. The capacity of the mill which is the scope of the study is 30 tons of FFB/hour which is planned to be built outside the plantation area.
- Evidence that consultations with the parties have been carried out is an assessment by the AMDAL Assessment Commission which was carried out on March 29, 2004 based on letter number 660.1/021/III/DLHESDM-B Pontianak district. In this activity, related stakeholders have been involved such as the plantation office, Bapeldalda, Forestry Service, BPN and representatives of local communities.
- The AMDAL document consists of the Main Report Document, Environmental Management Plan (RKL), Environmental Monitoring Plan (RPL) and Executive Summary. The ANDAL document has explained the business activity description plan or activities regarding the preparation/pre-construction stage, physical development/construction stage and non-plant physical development.

Social Impact Assessment (SIA)

Certification unit already conducted a Social Impact Assessment (SIA) 2015 for Palm Oil Plantations and Mills within the scope of Unit Certification of PT Bumi Pratama Khatulistiwa. The assessment process was carried out on 13 – 18 April 2015 in collaboration with PT. Asian mark. Social impact assessment is included as part of Complementary to all environmental impact assessments. The assessment involved all parties affected by both internal and external stakeholders, including employees, workers union, village heads around the plantations and local NGOs. Participatory evidence with affected parties is shown in the form of attendance at FGD meetings and photos during interviews. The scope of the study includes the Management Unit of PT. BPK, The Four Villages around the plantation, and the Plasma Cooperative partner.

The report contains a description of the positive and negative socio-economic impacts of PT BPK's plantation and palm oil mill management activities. The data collection process was carried out by involving the community and workers as sources of information using interviews, focus group discussions and distributing questionnaires in the village. In the report, there is also a matrix on the Social Management Plan and Social Monitoring Plan and an Attachment to the Attendance List of participants in the data collection process. There are in the document attachments, evidence of participatory activities that are carried out completely and well documented. The stakeholders involved were 122 resource persons, 7 stakeholders, and held 5 FGD meetings and public consultations, as well as 8 informal meetings in the form of FGDs and in-depth interviews.

Community representatives who became resource persons in this assessment were the village head, village secretary, village apparatus, hamlet head, traditional leaders, village midwives, and farmers/fishermen/laborers. The types of data collected were primary and secondary data. Primary data collection for monitoring social impact management was obtained from informants as the affected party as well as local village officials who represented the community and as verifiers. The secondary data or indirect data collection is in the form of evidence, notes, archives or published historical reports as well as references in the form of AMDAL, HCV documents, local government literature, notes on CSR implementation and others. The aspects of the assessment are Economic Life (Natural Potential, Livelihoods, Local Economy, Food Security, Vulnerable Groups, Company Contribution, Plasma Plantation Development) and Social and Cultural aspect. Meanwhile, another secondary data is obtained indirectly through intermediary media in the form of published evidence, records, archives, or historical reports. Retrieval of secondary data through literature studies. Secondary data is obtained from related units to document impact management as well as additional data from relevant affected parties. The reading material used is documentation of the implementation of impact management, internal company data, correspondence between the company and affected parties, and so on. Secondary data is also obtained from parties that are not directly related, such as sub-district data or news or pages from the media. Negative and positive issues were summarized during the assessment included management recommendations.

The certification unit has identified the HCV's contained in the High Conservation Value Assessment Report at PT. Bumi Pratama Khatulistiwa, Kubu Raya Regency, West Kalimantan Province. Identification is carried out in collaboration with PT. Remark Asia which took place in March – July 2015. The team for preparing the HCV assessment was led by Yokyok Hadiprakarsa who a member of the Assessor Licensing Scheme is or (RSPO Approved Assessor). The scope of the study is 7003.07 Ha consisting of estate and mill covering an area of 4854.52 Ha and plasma covering an area of 2148.55 Ha. Field data collection activities were carried out on April 14-18 2015

with the scope of social data collection covering Sungai Malaya Village, Sungai Enau Village, Kubu Padi Village, and Mega Timur Village. The peer review of the report was conducted by Machmud Thohari on February 13, 2016.

3.4.2

The Implementation of environmental monitoring and management plan are documented on periodical report of environmental monitoring and management implementation report (RKL-RPL) report for certification unit. The company are consistently done the environmental management and monitoring as outlined in the Report of the Environmental Management and Monitoring per semester regularly. The significant impacts that are managed and monitored based on AMDAL Documents.

The implementation of environmental management has been carried out in accordance with all RKL-RPL documents and Environmental Permits owned by the company. The certification unit makes RKL-RPL reports base on attachment of Environmental Permit where the matrix is a compilation of all previously owned UKL-UPL Matrix. The environmental management report is carried out every 6 months and submitted to the relevant agency, namely the RKL-RPL Report for Semester 2 of 2021 which was sent to the Environment Agency of Kubu Raya Regency with proof of receipt dated May 23, 2022 and attached with the stamp, signature and name of the recipient as well as proof of sending documents notes.

The company has tested the surface water quality as described in the RKL-RPL document for semesters I & II of 2021, for Mill it is carried out upstream & downstream of the Landak river while in Estate on the upstream & downstream Malaya river, upstream & downstream Parit tenaga Baru river, Parit Gotong Royong River, Parit Kongsi River and Ampaning River upstream & downstream. The results of the analysis of test data for the last 5 years also show that several parameters are above the quality standard and experience fluctuations in several parameters of BOD, COD and PH. The results of interviews with the company and a review of the RKL-RPL document for Semester 2 of 2021, information was obtained that the increase in some of these parameters was due to the decomposition of organic matter in peatlands and the large number of activities in surrounding villages that used water around them using bath wash toilet (*MCK*), while the low pH value caused oxygen dissolved in water is reduced. Currently the evaluation model carried out by the company is to compare the results of the analysis of the current period with the previous period. Based on this document, the company has evaluated data from monitoring results in the evaluation section.

As a form of social management, the company has developed/compiled by involving independent parties in conducting social impact assessments related to the company's operational activities. The first social impact assessment was carried out in May 2015 by Remark Asia as a follow-up to the results of the assessment, there are several recommendations/matrixes for the management plan and monitoring of social impacts, including:

- Company relationships and interactions.
- Plasma plantation certificate.
- CSR and surrounding village development programs.
- Conflict handling
- Grievance and complaint mechanism.

As an effort to improve and pay attention to the latest situation, in 2021 the company will carry out a Social Impact Review and Update, i due to the dynamic social situation and the seriousness of the company to build and maintain the company's sustainability. The SIA review includes:

- Job opportunities and business opportunities.
- Consultation and communication.
- Perception of the company.
- Occupational Health and Safety.
- Employee facilities and benefits

As a follow-up to the review, the company then developed a social management and monitoring plan, namely:

Impact from External	Impact from Internal
- Employment Opportunity	- Job opportunities.
- Consultation and communication	- Consultation and communication
- Perception of the company	

In the SIA process carried out in 2021, the company has involved various stakeholders, however:

- External stakeholders involved in the preparation of the management plan and social monitoring are still limited to a few affected

stakeholders such as Mega Timur Village (head of village and community leaders), Sungai Enau Village (head of village, local contractors, secretary of village, Village Deliberation Agency), Kuala Mandor B Village (Chairman of Village Deliberation Agency) and Sungai Malaya Village (head of village and community leaders) carried out in October 2021, not yet paying attention to the widely affected parties, such as women, the government, plasma farmers, those who use nearby water resources, and occupant.

- Internal stakeholders have not been directly involved in the management plan and social monitoring including by paying attention to the wider representation of workers such as local workers, migrants, women, new workers including casual workers.

Furthermore, the results of the document review and interviews with management and stakeholders (internal and external) revealed that the company had carried out social management and monitoring, which was carried out partially by the relevant departments, so that the reports on activities carried out were not comprehensive and integrated, for example:

- Employment and OSH impacts are managed by PGA and EHS.
- Environmental Impact and HCV managed by EHS and Conservation.
- External Impact (legal and social) managed by SSL (Social, Security and License).
- Plantation and POM operational activities are managed by the plantation and POM operational team.

By being carried out partially by the relevant departments, there are potential impacts that arise but are not fully documented and integrated on several issues that are currently developing or in the future, for example, but not limited to:

- Attention related to labor issues (employee status, low worker productivity, use of casual casual workers, wage issues).
- Attention to the issue of fruit theft / FFB.
- Attention related to legality issues and land conflicts (HGU validity period, land status after HGU expires).
- Attention related to the issue of water pollution and HCV being occupant area.
- Concerns related to flood issues, CSR dissatisfaction.
- Attention to the impact of operational activities on best cultivation and processing practices by companies, both plantations and mills.

Based on that explanations it was known if the social impact management and monitoring plan not developed with the participation of widely affected stakeholders so that there are several issues didn't identified and stated in the SIA Review report including the social management and social monitoring which are integrated by involving various relevant departments. **Based on that's explanation raised non conformity No 2022.01 with Minor Category**

3.4.3

Environmental Impact Assessment (EIA)

The company has documents, the implementation of the results of the environmental permit including reports to agencies in the form of RKL-RPL documents which are conducted every semester. The company can show proof of reporting in the form of a document affixed with a stamp, the name and signature of the recipient which is sent to relevant agencies such as the Environment Agency of Kubu Raya Regency with proof of receipt dated May 23, 2022, for the RKL-RPL Report for Semester 2 of 2021.

The implementation of environmental management and monitoring is carried out in accordance with the direction of the RKL-RPL as described in indicator 3.4.2. The effectiveness of environmental management and monitoring can be seen from the results of environmental management and monitoring analysis, which can also be seen from the suitability between the management and monitoring plans and their implementation in the field. The RKL-RPL document also shows that the company has managed all the impacts recommended in the UKL-UPL Documents. In general, the forms of evaluation carried out by the company include Trend Evaluation, Critical Level Evaluation and Compliance Evaluation. Based on the results document analysis, the company has carried out environmental management in accordance with the RKL-RPL by installing signboard for conservation areas. In addition, there is also marking in the form of stakes and red paint for spray-boundary areas and other chemical applications.

Social Impact Assessment (SIA)

The social management and monitoring plan is implemented, monitored and updated periodically in a participatory manner. In general, the social management plan of BPK POM is work programs from companies that are grouped into the social community, strengthening stakeholders, social culture and employment. The planned program is derived from the results of the Focus Group Discussions, socialization and review of SIA Programs conducted on September 25, 2021 to surrounding villages which was attended by 34 people. activities that have been carried out in villages around company and the workers/employees within the company (already explain in 3.4.1 and 3.4.2).

Through the implementation of the SIA program, BPK POM applies the RSPO's 7 principles on responsible new plantation development. For this reason, company is currently carrying out the stages of the Free, Prior, Informed and Consent (FPIC) PSR program to comply with the 7 RSPO principles. The principle of FPIC which is the basis for the company in carrying out the process of developing oil palm plantations in the CSR program involves women's representatives as community representatives who have an important role. Through this CSR program, it is hoped that it will be able to encourage women to be more active and involved in decision making in villages that are CSR targets in accordance with the FPIC Principles. Referring to the results of the verification of the SIA 2015 study, BPK POM has implemented Free, Prior and Informed Consent (FPIC) in the management of its plantations and palm oil mills. The application of FPIC in every aspect of activities that involve interaction with the community is contained in the company's commitment to sustainability and in the company's obligations as a member of the RSPO. The implementation of FPIC is a manifestation of the company's respect for community rights and other social components related to company activities.

In previous assessment there are opportunity for improvement regarding to ensure the implementation of the 2020 Social Aspects of Management and Monitoring Plan and Realization, and its has been verify during this assessment where the company has been carried out an SIA socialization and review on September 25, 2021 which was attended by surrounding villages with the aim of monitoring and updating the SIA management program in a participatory manner with relevant stakeholders. The results of the meeting then resulted in the SIA Management and Monitoring Program for 2021-2022 where several programs that previously existed, were still being continued for the next period. This activity also aims to accommodate the aspirations of the surrounding community for the needs they expect from the company such as job opportunities, road repairs and other facilities. Based on verification document period management and monitoring SIA 2021, The company has implemented of the 2021 Social Aspects of Management and Monitoring Plan and Realization.

3.4.2	Status: NCR No. 2022.01 with minor category
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3.5

A system for managing human resources is in place.

3.5.1

The certification unit already has Company Regulations that have been ratified by the relevant manpower office based on the decree of the head of the manpower office No. 169 dated 10 September 2021. The Company Regulation regulates the terms and conditions of employee employment, including the regulation of recruitment requirements, working hours, wages, social security, leave, termination of employment, work rules and discipline, rules for the process dispute resolution, and other provisions. This company regulation has also been socialized to all estate and mill employees on September 27, 2021.

In addition, the certification unit also has an Employee Recruitment SOP which explains the procedures for the recruitment process including job requests based on workforce planning, job vacancies notification, pre-selection and selection process, job interview and fitness, health checks, job offers, hiring decisions and employment agreements

Regarding employee performance appraisal, it is regulated in certification unit policy which is the certification unit's right to improve the quality and productivity of existing human resources by giving awards to employees who excel. Employee promotions are determined according to the results of the work performance assessment and in the interest of the certification unit's strategy and employee career development with the following criteria: having dedication and loyalty in their field of duty, working based on the system and method as well as the stipulated conditions, having the ability to always try to improve abilities and performance and always work with a healthy and dynamic code of ethics.

3.5.2

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

- Job application letter for prospective employees with the initials MD dated June 13, 2022. Attached documents sent by prospective employees are the latest education certificate, police record, identity card, and family card.
- Evaluation of employee performance with the initials MN for the 2022 period. The assessment is based on 3 criteria, namely: ability to work, how to work, and self-management. Based on the results of the assessment, the certification unit gave a recommendation for promotion to permanent worker.
- Promotion document in the Decision Letter of Estate Manager with the number: 001/BPK-HRR/SK/I/2022 which states that the employee with the initials MN is appointed as a permanent employee from his previous status of casual daily employee.

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

Status: Comply

3.6
An Occupational Health and Safety (H&S) plan is documented, effectively communicated and implemented.
3.6.1

The certification unit has carried out a risk assessment to identify Occupational Health & Safety issues in all operations, which are documented in the PT Bumipratama Khatulistiwa Assessment for the 2022 period, which was approved by the Head of OHS Committee in December 2021. The document describes the type of work, potential hazards/ risks that will arise, effects and risk categories, as well as risk control. This assessment covers all hazards and risks in estate, such as herbicide application, fertilization, harvesting, slashing, landscaping, FFB loading, transportation, desilting, thinning & care, pest and disease control, warehouses and so on. Based on field observations and interviews with estate and mill workers, known that officers have understood the potential work risks and how to minimize these risks. The certification unit also shows the HIRAC document for the Mill unit which describes the results of hazard identification and its control in FFB weighing operations, loading ramp stations, sterilizer station operations, thresher stations, press station operations, boiler station operations and so on.

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

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

3.6.2

Monitoring the effectiveness of the OHS plan in dealing with health & safety risks is carried out on a regular basis through monthly OHS Committee meetings that discuss OHS issues in the certification unit. The following are some recordings of activities monitoring the effectiveness of the OHS plan through monthly OHS Committee meetings:

- Minutes of the Safety Meeting on January 27, 2022, with discussions covering the 2021 work accident evaluation, OHS inspection, EHS report. The meeting was attended by 15 participants.
- Minutes of the Safety Meeting on February 24, 2022, with discussions covering the january work accident evaluation, OHS inspection, EHS report. The meeting was attended by 12 participants.
- Minutes of the Safety Meeting on March 29, 2022, with discussions covering the february work accident evaluation, OHS inspection, EHS report. The meeting was attended by 17 participants.

Based on interview with the Manpower Agency of Kuburaya Regency, it is known that occupational accidents have been reported regularly in the OHS Guiding Committee quarterly report. There are no cases of fatality.

	Status: Comply	
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3.7
All staff, workers, Scheme Smallholders, out growers, and contract workers are appropriately trained.
3.7.1

The certification unit has a training plan document for 2022 which includes training for staff, workers, smallholders, and outgrowers, for example training for the use of first aid kits for staff, workers, and smallholders planned on August 2022. It was further explained that the 2022 training plan document can be accessed by all interested parties.

The certification unit showed examples of training documents to KUD Mekar Lestari and KUD Buah Jubata as follows:

1. Pesticide storage training held on December 9, 2021.
2. Training on handling used pesticide packaging on 17 February 2022.

In addition, the certification unit also shows examples of training documents to contractors as follows:

1. Safety training in driving for FFB supplier drivers on January 17, 2022.
2. OHS training while working at height to building contractor employees on March 2, 2022

The certification unit shows the operator license documents as follows:

1. Backhoe Loader License on behalf of Eko Susanto with Reg. 89526-OPK3-LT/PAA/VI/2017 dated 9 June 2017 with a validity period

- until 9 June 2022. (Expired).
2. Wheel Loader License on behalf of Suwanto with No. 14,40964-OPK3-PAA/IX/2014 dated 26 September 2014 with a validity period until 26 September 2019. (Expired)
 3. Boiler License on behalf of Wendi with Reg. 10762.OPK3-PUBT-B.II/2017 dated January 30, 2017 with a validity period until January 30, 2022. (Expired)
 4. Competency certificate for welding industry services for the 3G-SMAW welding process with No. Reg. JIP 024.00000064.2017 dated 10 May 2017 which is valid for 3 years. (Expired)
 5. Competency certificate for welding industry services for the 4G-SMAW welding process with No. Reg. JIP 024,0000272.2017 dated 31 May 2017 which is valid for 3 years. (Expired)

In this regard, the certification unit has submitted an extension as stated in the letter below:

- Letter from Sr. HRR Manager to the Director General of *Binwasnaker & K3* Ministry of Manpower RI with No. 370/BPK-HRR/EXT/XII/2021 dated December 15, 2021 regarding the extension of the lifting equipment operator license.
- Letter from Sr. HRR Manager to the Director General of *Binwasnaker & K3* Ministry of Manpower RI with No. 374/BPK-HRR/EXT/XII/2021 dated 15 December 2021 regarding the extension of the boiler operator license.
- Letter from Sr. HRR Manager to the Director General of *Binwasnaker & K3* Ministry of Manpower RI with No. 375/BPK-HRR/EXT/XII/2021 dated December 15, 2021 regarding the extension of the welder's license.

Until the audit activity takes place, the license extension has not yet been issued. In this regard, the certification unit in this case has the opportunity to ensure the progress of the extension of the OHS operator license. **OFI**

3.7.2

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

- Socialization of the useful life and replacement of PPE which will be held on March 09, 2022 at office courtyard. The socialization was attended by estate, mill and contractor employees. The certification unit can show documentation and attendance list for the socialization.
- Socialization of human rights policies and ethical behavior which was held on January 15, 2022, which took place in the mill meeting room. The training was attended by employees and representatives of the surrounding community. The certification unit can show documentation and attendance list for the training.
- Emergency response simulation carried out on May 18, 2021 at the mill. The simulation was followed by employees and representatives of the surrounding community. The certification unit can show documentation and attendance list for the simulation.

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

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

3.7.3

The training program period of 2022 is available including RSPO Supply Chain. Actual training for RSPO Supply Chain in 2021 was conducted on 28 April 2022. The training was subjected to RSPO SCC System 2020. Training attended by relevant personnel including Mill Manager, Office Assistant, Field Assistant, weighbridge clerk, production clerk, and security.

Based on interviews with the workers involved in SCCS operations, such as security (for FFB receiving verification), weighbridge operator (for dividing the amount of certified and uncertified sourced), and Administration Head (for recording and monitoring the MB data), knowing that the workers understood the SCCS mechanism, and the MB record has conducted and monitored well. Furthermore, based on interview with field assistant, production clerk and other estate staff they also have an understanding related to RSPO including the implementation of the supply chain of certified products

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1; 3.8.2

The SCSS module applied in BPK POM 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 four categories: own estates, smallholder, estate under the subsidiary

of Wilmar's, and independent suppliers / third parties. The Mill has 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 production has been verified during this assessment, The estimates of certified production for the next license period also have been set, in a reasonable amount considering the last year's production. The data are shown in the following table:

Product	Estimate Production	Actual Production November 2020 – May 2022 (MT)	Estimate Production next 12 months (MT)
FFB	136,000	112,381.23	80,000.00
CPO	25,461	20,919.77	16,000.00
PK	5,479	4,556.60	3,600.00

Since the last period of assessment BPK POM applied scenario 4 in accordance with RSPO Contingency Audit Procedures and there is no new license since the issued ASA 1.3 assessment and due to there being no new license since the expired period, the palm trace id of BPK extended every three months since the license expired and the volume of certified products will be added according to the request of the certification unit. During this license there are several additional RSPO Products as follows:

Dated	Additional Volume (MT)			
	FFB Estate	FFB scheme or associated	CSPO	CSPK
13 October 2021	26,000		3,825	790
17 January 2022	15,000		2,278	580
04 April 2022	16,000		3,953	760
21 June 2022	19,000		4,605	949

3.8.4

BPK POM has been registered and met the requirements of reporting supply chain through the RSPO supply chain managing organization (palm-trace), which describing below:

Sub License ID : CB115980
 Member Name : Bumi Pratama Khatulistiwa
 Member ID : RSPO_PO1000004335
 RSPO Membership Number : 2-0017-05-000-00 (PT Bumi Pratama Khatulistiwa)
 Issued On : 19-03-2021
 Issued By : PT Mutuagung Lestari
 Start Date : 04-04-2021
 End Date : 17-09-2022

All transaction has been announced to RSPO IT Platform and confirmed shipped. The Mill has conducted SCCS mechanism such as the 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

Procedure-related SCCS imposed in the SOP traceability product of CPO and PK – Mass Balance (SOP/BPK-ADM/007/ 0521) dated May 2021) with the purpose of the procedure is to ensure the fulfillment/accuracy of the data and mass balance stock of CPO and PK, as well as sustainable or non-sustainable. The procedure has been referring to the latest SCCS standard for P&C and Mill (Criteria 3.8 RSPO Principle and Criteria 2018). The procedure has been covering all elements of SCCS starting from the acceptance of FFB, processing of FFB and CPO/PK production (recorded on a 3 monthly basis with appropriate ratio calculation), shipment of CPO certified, and PK certified (should be of positive stock, specify RSPO certificate number on the sales documents) and palm trace data entry.

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

3.8.6

Procedure to carry out internal audits are ruled in SOP Internal audit (SOP/BPK-EHS/018/0612) that described if internal audits are carried out annually (1time a year). The latest internal audit of SCCS is conducted on 23 March 2022, based on the internal audit there were two non-conformities about SCCS requirements regarding training and management review. All non-conformity has been closed and discussed in the management review that was held on 20 May 2022. The management review discussion has covered the input from internal audit results, correction and corrective action, customer feedback, process Performa and product compliance, follow-up of previous management review, and recommendation for improvement.

3.8.7

The company has been to verify and monitoring related FFB source & tonnage for Certified FFB and Non-Certified FFB such as:

1. November – December 2020			
Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Nov-20	5,852.07	3,614.05	9,466.12
Dec-20	5,687.26	3,641.10	9,328.36
Total	11,539.33	7,255.14	18,794.47
2. January – December 2021			
Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Jan-21	5,830.49	4,048.58	9,879.07
Feb-21	4,798.42	3,015.29	7,813.71
Mar-21	6,325.64	3,629.28	9,954.92
Apr-21	6,842.05	3,520.65	10,362.70
May-21	5,493.59	3,804.22	9,297.81
Jun-21	6,878.77	3,661.84	10,540.61
Jul-21	5,847.75	4,457.83	10,305.58
Aug-21	7,508.36	4,311.99	11,820.35
Sep-21	7,205.53	3,674.69	10,880.22
Oct-21	6,166.25	3,286.29	9,452.54
Nov-21	6,322.05	3,216.95	9,539.00
Dec-21	4,930.60	2,651.50	7,582.10
Total	74,149.50	43,279.10	117,428.60
3. January – May 2022			
Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Jan-22	4,574.97	2,217.80	6,792.77
Feb-22	4,130.66	1,856.80	5,987.46
Mar-22	6,148.77	2,778.20	8,926.97
Apr-22	5,950.69	3,918.65	9,869.34
May-22	5,887.31	8,063.07	13,950.38
Total	26,692.40	18,834.50	45,526.90

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

Product	Estimate Production	Actual Production November 2020 – May 2022 (MT)	Estimate Production next 12 months (MT)
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FFB	136,000	112,381.23	80,000.00
CPO	25,461	20,919.77	16,000.00
PK	5,479	4,556.60	3,600.00

Since the last period of assessment BPK POM applied scenario 4 in accordance with RSPO Contingency Audit Procedures and there is no new license since the issued ASA 1.3 assessment and due to there being no new license since the expired period, the palm trace id of BPK extended every three months since the license expired and the volume of certified products will be added according to the request of the certification unit. During this license there are several additional RSPO Products as follows:

Dated	Additional Volume (MT)			
	FFB Estate	FFB scheme or associated	CSPO	CSPK
13 October 2021	26,000		3,825	790
17 January 2022	15,000		2,278	580
04 April 2022	16,000		3,953	760
21 June 2022	19,000		4,605	949

Regarding mechanism in place for handling of non-conforming FFB and/or documents has been described in the SCCS Procedure were If there are FFB uncertified claimed as FFB certified and has been process, the mill will move FFB from certified columns to uncertified columns and automatically will affect bookkeeping stock RSPO and non RSPO product stock and if there is wrong input during FFB reporting the logistic team will coordinate with estate to revise the reports,

3.8.8

The CSPO and CSPK from the Mill that was sold as RSPO-certified products have met the requirements of certified product information. Supporting documents shown were the contract agreement, delivery order, delivery ticket, report of loading, weighing minutes, weighing card, and delivery note. Those documents cover information 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, interviews with management as well as verification through Palm Trace it was known during the period November 2020 – May 2022 there are 20597.76MT CSPO and 4450.04 MT CSPK Dispatch under RSPO Certified.

Documents verification and interview during an audit it was known the claimed RSPO product of CSPO and CSPK is no longer than 3 months since the product was 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 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 the sample below:

1. CSPK

Shipping announcement with transaction TR-67c66dad-2076 volume of CSPK 185.35 MT, a module of SCCS MB, dated 15 June 2022 with the buyer PT Wilmar Cahaya Indonesia Pontianak, the mill can present supporting document:

- PK Shipping period in 06 – 30 May 2022
- Sample of Weighbridge ticket document from BPK POM on 30 May 2022 covering 7,740 MT

2. CSPO

Shipping announcement with transaction id TR-364b4a56-983a volume of CSPO 1,114.43 MT, the module of SCCS MB, dated 15 June 2022 with the buyer PT Wilmar Cahaya Indonesia Pontianak, the mill can present supporting document:

- CPO Shipping period on 27 April 2022 and 18 May 2022
- Minutes of calculation Despatch CPO on 27 April 2022 and 18 May 2022
- Minutes of CPO Loading of CPO on 27 April 2022 and 18 May 2022
- In the selling documents has been informed RSPO Certificate number MUTU-RSPO/100 with SCCS Model MB

3.8.9; 3.8.10; 3.8.11

Based on documents verifications and interview with management it was known there is no contractor used for the processing or physical handling of RSPO certified oil palm products. CPO and PK transporting are under responsibility the buyer.

3.8.12

Mill has record and balance of all RSPO CSPO and CSPK, non-certified products produced, as well as its dispatch on a monthly and three-monthly basis, presented in the Table bellows:

CPO production and Dispatch for BPK POM

1. November – December 2020							
Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
opening stock	220.89	188.59	409.48				
Nov-20	1,016.68	615.84	1,632.52	576.44	-	-	576.44
Dec-20	1,039.93	693.20	1,733.13	1,328.49	-	-	1,328.49
Total	2,277.50	1,497.63	3,775.13	1,904.93	-	-	1,904.93
Closing stock 2020	372.57	397.63	770.19				
2. January – December 2021							
Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
opening stock	372.57	397.63	770.19				
Jan-21	1,033.66	702.52	1,736.18	1,255.74	-	-	1,255.74
Feb-21	884.74	550.80	1,435.54	499.06	-	-	499.06
Mar-21	1,189.47	678.54	1,868.00	895.19	-	-	895.19
Apr-21	1,317.87	691.38	2,009.24	1,515.78	-	-	1,515.78
May-21	1,023.90	659.32	1,683.22	1,368.50	-	-	1,368.50
Jun-21	1,310.58	727.98	2,038.57	1,241.47	-	-	1,241.47
Jul-21	1,065.70	830.40	1,896.10	631.93	-	-	631.93
Aug-21	1,389.54	764.91	2,154.45	1,827.02	-	-	1,827.02
Sep-21	1,301.75	696.83	1,998.58	1,301.94	-	-	1,301.94
Oct-21	1,104.17	588.76	1,692.92	623.72	-	-	623.72
Nov-21	1,193.91	608.98	1,802.90	1,700.92	-	-	1,700.92
Dec-21	867.33	489.42	1,356.75	642.81	-	-	642.81
Total	13,682.62	7,989.82	21,672.44	13,504.07	-	-	13,504.07
Closing stock 2021	551.12	285.46	836.57				
3. January – May 2022							
Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
opening stock	551.12	836.57					
Jan-22	836.17	393.84	1,230.01	673.29	-	-	673.29
Feb-22	734.92	316.96	1,051.88	654.25	-	-	654.25
Mar-22	1,172.28	548.61	1,720.89	1,414.31	-	-	1,414.31
Apr-22	1,103.40	735.67	1,839.06	1,386.04	-	-	1,386.04
May-22	1,112.89	1,519.35	2,632.24	1,060.88	-	-	1,060.88
Total	4,959.65	3,514.43	8,474.08	5,188.76	-	-	5,188.76

Closing stock May 22	322.01	478.85					
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PK production and Dispatch for BPK POM

1. November – December 2020							
Period	CSPK production (MT)		Total	CSPK Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
opening stock	49.75	34.58	84.32				
Nov-20	227.73	137.27	365.00	223.27	0.00	0.00	223.27
Dec-20	215.42	144.35	359.76	236.75	0.00	0.00	236.75
Total	492.90	316.19	809.09	460.02	0.00	0.00	460.02
Closing stock 2020	32.88	20.54	53.42				
2. January – December 2021							
Period	CSPK production (MT)		Total	CSPK Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
opening stock	32.88	20.54	53.42				
Jan-21	223.57	152.03	375.59	223.14	0.00	0.00	223.14
Feb-21	193.84	121.19	315.02	191.20	0.00	0.00	191.20
Mar-21	260.13	147.60	407.74	258.36	0.00	0.00	258.36
Apr-21	292.47	151.16	443.63	282.46	0.00	0.00	282.46
May-21	226.59	143.08	369.67	202.19	0.00	0.00	202.19
Jun-21	271.84	152.35	424.19	312.15	0.00	0.00	312.15
Jul-21	238.07	183.35	421.42	240.67	0.00	0.00	240.67
Aug-21	323.43	180.46	503.89	295.92	0.00	0.00	295.92
Sep-21	287.12	154.60	441.72	273.69	0.00	0.00	273.69
Oct-21	245.42	129.63	375.05	259.54	0.00	0.00	259.54
Nov-21	260.14	131.63	391.76	253.11	0.00	0.00	253.11
Dec-21	192.12	108.00	300.11	206.83	0.00	0.00	206.83
Total	3,014.73	1,755.07	4,769.80	2,999.25			2,999.25
Closing stock 2021	48.35	36.31	84.67				
3. January – May 2022							
Period	CSPK production (MT)		Total	CSPK Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
opening stock	48.35	36.31	84.67				
Jan-22	183.12	87.30	270.43	206.52	0.00	0.00	206.52
Feb-22	153.28	65.79	219.07	146.25	0.00	0.00	146.25
Mar-22	251.11	118.07	369.18	161.59	0.00	0.00	161.59
Apr-22	218.20	149.33	367.53	291.39	0.00	0.00	291.39
May-22	243.27	325.05	568.32	185.02	0.00	0.00	185.02
Total	1048.98	745.54	1794.52	990.77	0.00	0.00	990.77

Closing stock May 22	106.56	157.56					
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Based on table above, can be summarized as table below:

a. Tonnage Product

Description	Volume (MT)
Certified FFB	112,381.23
CSPO Production	20,919.77
CSPK Production	4,556.60

b. Product Selling

Description	Volume (MT)
CSPO sold as RSPO certified product	20,597.76
CSPK sold as RSPO certified product	4,450.04
CSPO sold under another scheme	0
CSPK sold under another scheme	0
CSPO sold as conventional	0
CSPK sold as conventional	0

3.8.13; 3.8.14

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

3.8.15

BPK POM applied SCCS – module E (MB) since its received and processing the FFB from certified and uncertified sources, verification is done through field observation and interview to security and weigh-bridge operator as well as management representative. The mill claims only the volume of oil palm products produced from certified FFB as MB.

3.8.16

The CSPO and CSPK from the Mill that was sold as RSPO-certified products have met the requirements of certified product information. Supporting documents shown were the contract agreement, delivery order, delivery ticket, report of loading, weighing minutes, weighing card, and delivery note. Those documents cover information 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, interviews with management as well as verification through Palm Trace it was known during the period November 2020 – May 2022 there are 20597.76MT CSPO and 4450.04 MT CSPK Dispatch under RSPO Certified.

Documents verification and interview during an audit it was known the claimed RSPO product of CSPO and CSPK is **no longer than 3 months since the product was 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 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 the sample below:

1. CSPK

Shipping announcement with transaction TR-67c66dad-2076 volume of CSPK 185.35 MT, a module of SCCS MB, dated 15 June 2022 with the buyer PT Wilmar Cahaya Indonesia Pontianak (KCP, the mill can present

- PK Shipping period in 06 – 30 May 2022 with RSPO Certificate No MUTU-RSPO/100

- Sample of Weighbridge ticket document from BPK POM on 30 May 2022 covering 7,740 MT

2. CSPO

Shipping announcement with transaction id TR-364b4a56-983a volume of CSPO 1,114.43 MT, the module of SCCS MB, dated 15 June 2022 with the buyer PT Wilmar Cahaya Indonesia Pontianak (KCP, the mill can present

- CPO Shipping period on 27 April 2022 and 18 May 2022 with RSPO Certificate No MUTU-RSPO/100
- Minutes of calculation Dispatch CPO on 27 April 2022 and 18 May 2022
- Minutes of CPO Loading of CPO on 27 April 2022 and 18 May 2022

3.8.17

Unit management did not use logo or trademark during communication with stakeholders / customer.

	Status: Comply	
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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 had a Human Rights Policy signed by Group Plantation Head and Group CSR Head, updated January 2018 and is included in the Wilmar Policy (November 2019) at point 3 that it will not do exploitation of fellow humans and local communities. The company also has a Grievance Procedure for The Implementation of Wilmar's No Deforestation, No Peat, No Exploitation (NDPE) Policy updated version 2.0 June 2019. At point 4.2 in the document, explained about the Protection of Human Rights Defenders, Whistleblowers, Complainants and Community Spokespersons

During the audit carried out, the team auditor has been trying to ensure this policy has been communicated and implemented through stakeholder consultation. Based on interviews with workers, the surrounding community (village head, community leaders, smallholder's representative), and contractors knew that the company has socialized company policies regularly including policies on human rights.

4.1.2

The Unit of certification does not instigate violence or any form of intimidation in its operations, when there is any escalated dispute, the company prioritizes, the company prioritizes a persuasive approach by suggesting to report to the government or relevant agencies with supporting evidence. This has been confirmed during public consultation with the local government and relevant stakeholders at the time of the audit.

	Status: Comply	
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4.2

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

4.2.1

The certification unit has a Complaint SOP with SOP document number SOP 60/WIP-KB/(0). The procedure is a reference in receiving and resolving complaints from external and internal parties. Meanwhile, the personnel responsible for receiving and documenting complaints from the parties are Corporate Affairs. Complaints that exist will be reviewed and consulted with the parties for resolution. It was further explained that each reporter's identity (anonymity/ whistleblower) is kept/ confidential, the certification unit has installed a bulletin board at the front of the office area in each work unit, for example in the plantation and factory offices. The main points of the notification are the address of the complaint (phone number & email) and the guarantee of confidentiality and protection for the complainant.

If the complaint is not resolved by deliberation and consensus, then the certification unit and the party submitting the complaint want a resolution through the Mediation Forum. The Mediation Forum meeting must take place at the location of the third party or other agreed place of neutrality.

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

4.2.2

The certification unit has established a system for handling complaints and complaints for all affected parties which is documented in the Grievance Handling and Complaints Procedure with document number SOP 60/WIP-KB/(01)/0915 revision 02 dated January 6, 2021. There are additional provisions on point 13 regarding the implementation of communication and consultation procedures to stakeholders, where the socialization of this procedure is carried out by displaying the procedure in writing or by showing pictures so that it can be understood by stakeholders who cannot read and write. The procedure states that all complaints must be registered in the Complaint Form (Attachment 1 of the SOP) in clear and easy to understand language. All complaint forms will be collected and registered monthly into the Grievance Register Book (Appendix 2 of the SOP). Certification unit will respond to each complaint within 14 days from the date the complaint request was received.

The procedure has been socialized to estate and mill workers as well as to the surrounding community on January 14, 2021. Certification units can show the minutes and attendance lists for the socialization.

4.2.3

Based on document verification of internal and external complaint book for 2021-2022, it is known that there were complaints from the Sungai Enau Village community on December 3, 2021, who complained about flooding due to the operation of the certification unit. The certification unit in this case responds to these complaints by washing the ditches regularly every rainy season. In addition, the certification unit also provides basic food assistance to affected communities. The follow-up to the certification unit was completed on December 11, 2021, the certification unit in this case provided information to representatives of the community. The certification unit can show documentation of the delivery of assistance to the surrounding community.

4.2.4

The certification unit has a document procedure that was state on *Prosedur Pengelolaan/ Penanganan Keluhan dan Atau Pengaduan* (SOP 60/WIP-KB/(0)). The procedure aims to provide assurance to whistleblowers who have a good will to report suspected abuse or divergent practices. Whistleblowers will be protected from retaliation or actions that may harm the whistleblower. Furthermore, regarding Confidentiality, it is explained that the certification unit encourages the whistleblower to write a clear and complete identity when reporting irregularities that occur. All forms of reporting irregularities will be guaranteed confidentiality by the certification unit. If the complaint cannot be resolved by consultation, it can follow up the next step or go through the process to the RSPO.

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

Based on interview with Megah Timur and Sungai Enau head of village sighted that if any conflict resolution, they have access to independent legal and technical advice.

Status: Comply

4.3

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

The results of interviews with management, conveyed that the CSR program was prepared based on the participation of the surrounding community. The company shows examples of forum group discussion on 29 to 12 Desember 2020, involved nearest community included the Village Heads around the company Kuala Mandor B, Mega Timur, Sungai Enau and Malaya Village

From the results of meetings with the community, a CSR program was prepared in 2020. For the CSR program in 2021, the company arranged a CSR program in the fields of Economy, Environment, Education, and social culture. The company has also shown the CSR realization record to the communities. For example:

- Donation for street lighting in Mega Timur village August 28, 2021
- Donation for repairing village offices May 11, 2021
- Donation for village security pos Mega Timur village April 22, 2021
- Etc.

The CSR programs have been prepared in a participatory manner, one of which is through the *village council MUSREMBANG* activity.

Based on interviews with representatives from Bukit Raya and Keruing Villages, it is known that the preparation of the CSR program was carried out with input from the village, so far, the CSR program has been running smoothly. The company has assigned Managers and legal department to assist CSR program develop by dialogue with the local community.

Status: Comply

4.4

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

4.4.1

PT Bumi Pratama Khatulistiwa formerly named PT Bumi Khatulistiwa (PT BKU) which was established in 1990 based on Notarial Deed (Suwanto SH) No. 5 dated 1 August 1990 as Hybrid coconut and Pineapple Plantation. Then in 1992 there was a change in the company's name to PT Bumi Pratama Khatulistiwa in accordance with the Notarial Deed No. 37 dated 11 January 1992 regarding the Change of Company Name to PT Bumi Pratama Khatulistiwa. which takes over by Wilmar International Limited in 1999 (19 March 1999) based on Approval Letter of the State Minister of Investment / Head of the Investment Coordinating Board regarding the change in company status No 25/V/PMA/1999. From the total land title covering 4,814.96 Ha the company has been compensated area with the total area 2,611.030 Ha or based on SKT or 2,328.730 ha based on actual measurement. The land compensation involved 14 community groups with a total person is 960 people and was carried out during the period 1998 – 2006.

PT. BPK has managed totalling area for about 4,842.95 Ha as scope of certification. The corporate area originates from state land with other usage area status, in which there are several community's land. The acquisition process began with obtaining a location permit from head of land agency of Pontianak District in 1996. The next process is land acquisition from community's area by providing compensation since 1998. The Document of land use right (HGU) on an area of 4,842.95 Ha can be shown by PT BPK, consisting of:

- HGU for an area of 4,814.96 Ha based on Minister of Agrarian / Head of BPN Decree No. 18/HGU/BPN/96 dated 31 May 1996. 30-year concession valid until 21 July 2026 (HGU Certificate No. 59 of 1996 dated 29 July 1996).
- There are 3 HGB, namely:
 - HGB certificate No. 00078 dated 2 July 2020 covering an area of **4.427 Ha**
 - HGB certificate No. 00079 dated 3 July 2020 covering an area of **106,700 m²**
 - HGB certificate No. 00080 dated 3 July 2020 covering an area of **128,900 m²**

4.4.2; 4.4.5

The company already has an FPIC SOP as stated in the documents:

- SOP Free Prior & Informed Consent /FPIC dated SOP 06/WIP-KB (0)/2011 dated January 2011 with the aims as a guide to the process of obtaining FPIC from local communities or indigenous communities as owners of land to be converted into oil palm plantations
- SOP for the Technical Guidelines for Land / Land Acquisition Document No SOP01 / WIP-KB / (1) / 1215 on the effective date of January 1, 2015, legalized by GM PT BPK. In part E it is explained that the principle of carrying out land acquisition is in accordance with the principles of RSPO, HCVF and FPIC, namely land acquisition is carried out based on a decision that was born from a deliberation process to reach a consensus for investment interests freely without pressure (free) and the community has the right to agree or refuse (consent).

The CH has shown that land acquisition has been done through negotiation. Based on the results of interviews with the Previous landowners obtained information if I compensation process has been held with transparency regarding the mutual agreement. The whole area managed by the company has been compensated. The compensation process involved all community witnessed also by the Village Head, Sub-district head, and other relevant parties. Records of the land compensation process consist of documents of land identification and inventory, land location maps, statements of the release of land rights by the owner, Receipts of Payment, Minutes of compensation/Compensation, and witnesses. For example, land acquisition for an area covering 309 Ha which is owned by farmers groups of Mekar Jaya, Parit Jaya Hamlet, the village of Sungai Enau, Subs District of Sungai Ambawang, can be evidenced with:

- Declaration of Agreement PT BPK with Sutarman and Japar which represents the community of farmers group mekar jaya with numbers of members are 147 persons (Japar = 19 + 48, Sutarman – 49 + 21; Hamdan 11) on 18 February 1998 who claims/owns / controls area inside the land title of PT BPK covering 309 Ha. That agreement described if PT BPK agreed to compensate to farmers' group, and the farmer's group agreed to deliver their land to the company as well as payment methods. The agreement was signed by both parties and witnessed by the village head, subdistrict police head, subdistrict military head, and subdistrict Head of Sei Ambanwang
- Besides declaration of agreements the company can present other documents for example land measurements documents, and

administrative completeness check documents. All documents above are also signed by relevant authority

4.4.3

As mentioned in indicator 4.4.2 PT BPK are a long-established company that has been started operationally in the early period of 1990, were on that's period, the FPIC concept not yet available. Currently there is no new land acquisition, and the entire compensation process was completed in 2006. Based on documents verifications. The compensation process involved all community witnessed also by the Village Head, Sub-district head, and other relevant parties. Records of the land compensation process consist of documents of land identification and inventory, land location maps, statements of the release of land rights by the owner, Receipts of Payment, Minutes of compensation/Compensation, and witnesses by relevant parties.

4.4.4;

As explained in indicator 4.4.2, it was informed that PT BPK had compensated the community with a total area with the total area of 2,611.030 Ha or based on SKT or 2,328.730 ha based on actual measurement. The land compensation involved 14 community groups with a total person is 960 people and was carried out during the period 1998 – 2006. Based on document verifications it was known if the compensation process involved all community witnessed also by the Village Head, Sub-district head, and other relevant parties. Records of the land compensation process consist of documents of land identification and inventory, land location maps, statements of the release of land rights by the owner, Receipts of Payment, Minutes of compensation/Compensation, and witnesses by relevant parties.

In addition, as part of the company's development, the company has also developed palm oil plantations for the community through a smallholder scheme with a total area of 2145.59 ha consisting of two smallholders' cooperative schemes (Mekar Lestari Cooperative and Tua Jubata Cooperative). Currently, the management of the Mekar Lestari cooperative has been carried out independently and the Tua Jubata cooperative is still under company management. The development of the smallholder scheme is one of the company's efforts so that the community around the company can benefit from the company's existence. In addition, to facilitate community access, the company has opened and built access roads to the community, where there are 6 access roads that cross the company connecting the surrounding villages/hamlets. With the existence of this access road, it is easier to access from villages / hamlets that were previously via the river, now can pass through the company's access road. this information has been verified through public consultation with village head and government agency as well as workers who still live around the company.

As time goes, there were demands from the community regarding the construction of a smallholder scheme and finally, the company developed a smallholder scheme in the name of Tuah Jubata Cooperation. For people who refuse to develop a smallholder scheme, the company compassionate with a total land area of 1756.01 Ha in 2012. During an audit, the company presented a letter of agreement to settle the claim between the Sungai Enau Village Farmers Group and PT Bumipratama Khatulistiwa on 19 January 2012. Sutarman is a representative of the 73 members of the farmer group and the head of the farmer group. In the letter of agreement, both parties agreed on the compensation for a land area of 168 ha and after payment of compensation, the community did not demand to develop an oil palm plantation.

4.4.6

Even though PT BPK has obtained a land title in 1996 with a validity period until 2026, there are community groups/farmer groups in Sungai Enau Village who consider that the land title of PT BPK is valid until 2021 or 25 years as promised at the time of the initial preparation/ compensation. There have been several incidents related to this (described in Criteria 4.1; 4.2 and 4.8). The results of the auditor's verification revealed that the validity period of the land title of PT BPK is 30 years as stated in the SK land title and HGU certificate and strengthened by the results of public consultations with the Land Agency which explains that administratively the land title of PT BPK is valid for 30 years. Based on the results of public consultations with the village head of Sungai Enau, the claim was based on the initial opening they were promised that the land title was 25 years, however, at the time of mediation or meetings with the local government they could not prove it.

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 to 4.5.8

Based on the document review (area statement), filed observation, interviews with the village head and Plantation Agency of Kubu Raya, it was found that there were no new land acquisitions/new planting after January 2010

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

Procedure of land acquisition available in the documents:

- SOP Free Prior & Informed Consent /FPIC dated SOP 06/WIP-KB (0)/2011 dated January 2011 with the aims as a guide to the process of obtaining FPIC from local communities or indigenous communities as owners of land to be converted into oil palm plantations
- SOP for the Technical Guidelines for Land / Land Acquisition Document No SOP01 / WIP-KB / (1) / 1215 on the effective date of January 1, 2015, legalized by GM PT BPK. In part E it is explained that the principle of carrying out land acquisition is in accordance with the principles of RSPO, HCVF and FPIC, namely land acquisition is carried out based on a decision that was born from a deliberation process to reach a consensus for investment interests freely without pressure (free) and the community has the right to agree or refuse (consent).

4.6.3

The CH has shown that land acquisition has been done through negotiation. Based on the results of interviews with the Previous landowners obtained information if compensation process has been held with transparency regarding the mutual agreement. The whole area managed by the company has been compensated. Based on interview with previous land owners as well as village head obtained information during land compensation has been pay attention regarding equal opportunities were provided to both men and woman. The compensation process involved all community witnessed also by the Village Head, Sub-district head, and other relevant parties. Records of the land compensation process consist of documents of land identification and inventory, land location maps, statements of the release of land rights by the owner, Receipts of Payment, Minutes of compensation/Compensation, and witnesses. For example, land acquisition for an area covering 309 Ha which is owned by farmers groups of Mekar Jaya, Parit Jaya Hamlet, the village of Sungai Enau, Subs District of Sungai Ambawang, can be evidenced with:

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- Besides declaration of agreements the company can present other documents for example land measurements documents, and administrative completeness check documents. All documents above are also signed by relevant authority

As mentioned in indicator 4.4.2 PT BPK are a long-established company that has been started operationally in the early period of 1990, were on that's period, the FPIC concept not yet available. Currently there is no new land acquisition, and the entire compensation process was completed in 2006. Based on documents verifications. The compensation process involved all community witnessed also by the Village Head, Sub-district head, and other relevant parties. Records of the land compensation process consist of documents of land identification and inventory, land location maps, statements of the release of land rights by the owner, Receipts of Payment, Minutes of compensation/Compensation, and witnesses by relevant parties.

4.6.4

As explained in indicator 4.4.2, it was informed that PT BPK had compensated the community with a total area with the total area of 2,611.030 Ha based on SKT or 2,328.730 ha based on actual measurement. The land compensation involved 14 community groups with a total person is 960 people and was carried out during the period 1998 – 2006. Based on document verifications it was known if the compensation process involved all community witnessed also by the Village Head, Sub-district head, and other relevant parties. Records of the land compensation process consist of documents of land identification and inventory, land location maps, statements of the release of land rights by the owner, Receipts of Payment, Minutes of compensation/Compensation, and witnesses by relevant parties.

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company has opened and built access roads to the community, where there are 6 access roads that cross the company connecting the surrounding villages/hamlets. With the existence of this access road, it is easier to access from villages / hamlets that were previously via the river, now can pass through the company's access road. this information has been verified through public consultation with village head and government agency as well as workers who still live around the company.

Status: Comply

4.7

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

Procedure of land acquisition available in the documents:

- SOP Free Prior & Informed Consent /FPIC dated SOP 06/WIP-KB (0)/2011 dated January 2011 with the aims as a guide to the process of obtaining FPIC from local communities or indigenous communities as owners of land to be converted into oil palm plantations
- SOP for the Technical Guidelines for Land / Land Acquisition Document No SOP01 / WIP-KB / (1) / 1215 on the effective date of January 1, 2015, legalized by GM PT BPK. In part E it is explained that the principle of carrying out land acquisition is in accordance with the principles of RSPO, HCVF and FPIC, namely land acquisition is carried out based on a decision that was born from a deliberation process to reach a consensus for investment interests freely without pressure (free) and the community has the right to agree or refuse (consent).

PT Bumi Pratama Khatulistiwa formerly named PT Bumi Khatulistiwa (PT BKU) which was established in 1990 based on Notarial Deed (Suwanto SH) No. 5 dated 1 August 1990 as Hybrid coconut and Pineapple Plantation. Then in 1992 there was a change in the company's name to PT Bumi Pratama Khatulistiwa in accordance with the Notarial Deed No. 37 dated 11 January 1992 regarding the Change of Company Name to PT Bumi Pratama Khatulistiwa. which takes over by Wilmar International Limited in 1999 (19 March 1999) based on Approval Letter of the State Minister of Investment / Head of the Investment Coordinating Board regarding the change in company status No 25/V/PMA/1999. From the total land title covering 4,814.96 the company has been compensated area with the total area 2,611.030 Ha based on SKT or 2,328.730 ha based on actual measurement. The land compensation involved 14 community groups with a total person is 960 people and was carried out during the period 1998 – 2006.

The CH has shown that land acquisition has been done through negotiation. Based on the results of interviews with the Previous landowners obtained information if I compensation process has been held with transparency regarding the mutual agreement. The whole area managed by the company has been compensated. The compensation process involved all community witnessed also by the Village Head, Sub-district head, and other relevant parties. Records of the land compensation process consist of documents of land identification and inventory, land location maps, statements of the release of land rights by the owner, Receipts of Payment, Minutes of compensation/Compensation, and witnesses. For example, land acquisition for an area covering 309 Ha which is owned by farmers groups of Mekar Jaya, Parit Jaya Hamlet, the village of Sungai Enau, Subs District of Sungai Ambawang, can be evidenced with:

- Declaration of Agreement PT BPK with Sutarman and Japar which represents the community of farmers group mekar jaya with numbers of members are 147 persons (Japar = 19 + 48, Sutarman – 49 + 21; Hamdan 11) on 18 February 1998 who claims/owns / controls area inside the land title of PT BPK covering 309 Ha. That agreement described if PT BPK agreed to compensate to farmers' group, and the farmer's group agreed to deliver their land to the company as well as payment methods. The agreement was signed by both parties and witnessed by the village head, subdistrict police head, subdistrict military head, and subdistrict Head of Sei Ambanwang
- Besides declaration of agreements the company can present other documents for example land measurements documents, and administrative completeness check documents. All documents above are also signed by relevant authority

As mentioned in indicator 4.4.2 PT BPK are a long-established company that has been started operationally in the early period of 1990, were on that's period, the FPIC concept not yet available. Currently there is no new land acquisition, and the entire compensation process was completed in 2006. Based on documents verifications. The compensation process involved all community witnessed also by the Village Head, Sub-district head, and other relevant parties. Records of the land compensation process consist of documents of land identification and inventory, land location maps, statements of the release of land rights by the owner, Receipts of Payment, Minutes of compensation/Compensation, and witnesses by relevant parties.

As time goes, there were demands from the community regarding the construction of a smallholder scheme and finally, the company developed a smallholder scheme in the name of Tuah Jubata Cooperation. For people who refuse to develop a smallholder scheme, the

company compassionate with a total land area of 1756.01 Ha in 2012. During an audit, the company presented a letter of agreement to settle the claim between the Sungai Enau Village Farmers Group and PT Bumi Pratama Khatulistiwa on 19 January 2012. Sutarman is a representative of the 73 members of the farmer group and the head of the farmer group. In the letter of agreement, both parties agreed on the compensation for a land area of 168 ha and after payment of compensation, the community did not demand to develop an oil palm plantation.

4.7.3

As explained in indicator 4.4.2, it was informed that PT BPK had compensated the community with a total area with the total area of 2,611.030 Ha or based on SKT or 2,328.730 ha based on actual measurement. The land compensation involved 14 community groups with a total person is 960 people and was carried out during the period 1998 – 2006. Based on document verifications it was known if the compensation process involved all community witnessed also by the Village Head, Sub-district head, and other relevant parties. Records of the land compensation process consist of documents of land identification and inventory, land location maps, statements of the release of land rights by the owner, Receipts of Payment, Minutes of compensation/Compensation, and witnesses by relevant parties.

In addition, as part of the company's development, the company has also developed palm oil plantations for the community through a smallholder scheme with a total area of 2145.59 ha consisting of two smallholders' cooperative schemes (Mekar Lestari Cooperative and Tua Jubata Cooperative). Currently, the management of the Mekar Lestari cooperative has been carried out independently and the Tua Jubata cooperative is still under company management. The development of the smallholder scheme is one of the company's efforts so that the community around the company can benefit from the company's existence. In addition, to facilitate community access, the company has opened and built access roads to the community, where there are 6 access roads that cross the company connecting the surrounding villages/hamlets. With the existence of this access road, it is easier to access from villages / hamlets that were previously via the river, now can pass through the company's access road. this information has been verified through public consultation with village head and government agency as well as workers who still live around the company. Furthermore, based on the document review (area statement), filed observation, interviews with the village head and Plantation Agency of Kubu Raya, it was found that there were no new land acquisitions/new planting after 15 November 2018.

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 to 4.8.4

As a guidance to settlement land dispute the company has had procedure to handling and manage land conflict namely Land Dispute Settelement Procedure (*Prosedur Penyelesaian Sengketa Pertanahan / SOP 59/WIP-KB/(0)/0915 dated 01 September 2015*) with the aims as technical guidance or SOP to ensure decision steps or actions by the company regarding dispute settlement were carried out appropriately and correctly based on the provisions and regulations of applicable laws, culture, or customary laws that apply in the community. This procedure are contain a specific guidance to manage land conflict such as gathering information, conduct a meeting with complainant and use the understanding language during the process. As explained by the management representative, a mutually agreed upon system for handling complaints will be established when a conflict found.

Based on document verifications, interview with management, community including elderly and local government as well as verification through internet and RSPO Website, obtained information there are several land issues in the company operational area, as follows:

1. Occupation area in PT BPK

Although PT BPK has gained land rights legally there are still many people using and cultivating in permit Areas. The area is managed by the community because previously no compensation has been carried out or the owner is not willing to be compensated. for the area, the company respects and there is no coercion to occupants to hand over the land to the company. the occupied area has been mapped and identified by the company, and currently, in the operational area, there is about ± 156.97 ha still managed by the community. Its has been confirmed during public consultation with land agency where in the concession of PT BPK there is an area occupied by the community (Occupation) and the National land Agency recommends that the area be released, and the company explained that will be carried during the extension of HGU

2. Dispute Area with Community of Sungai Enau Village

Even though PT BPK has obtained a land title in 1996 with a validity period until 2026, there are community groups/farmer groups in Sungai Enau Village who consider that the land title of PT BPK is valid until 2021 or 25 years as promised at the time of the initial preparation/ compensation. During the period of 2021 there were several demonstrations in the company's operational areas. the

community demands land title is no longer valid, so it belongs to the community / farmers group again. there have been several meetings involving the local government, the Regional House of Representatives, the Police and even the provincial government. during the meeting there was no agreement regarding this issue. Related to this, there are explanations from the government through several letters, as follows:

1. Letter from Kubu Raya Regent's No. 590/1468/Setda-A dated 03 August, 2021 regarding conflict settlement solutions between PT. BPK with Sungai Enau Village Farmers Group which described if according to the Decree of the Minister of Agrarian Affairs/ Head of BPN Number: 18/HGU/BPN/96 and HGU Certificate No. 59 that the validity period of PT. Bumipratama Khatulistiwa are for 30 years and valid until 2026.
2. Letter from the Head of National Land Agency Regional Kalimantan Barat Province BPN No. HP.01.03/991-61/VII/2021 dated 16 August 2021 regarding the explanation of the land title process in PT.BPK in Kubu Raya Regency
 - Issuance of land title (HGU) No. 59 based on the Decree of the Minister of Agrarian Affairs/Head of BPN No. 18/HGU/BPN/1996 dated 31 May 1996 was in accordance with the provisions of the law through the mechanisms and procedures in force at that time.
 - The reason of revision the written time from 25 years to 30 years is due to a typing error by the officer and has been crossed out and initialled (renvoi) by the authorized official at that time. However, the basis for granting land title (HGU) for a period of 30 years is in accordance with the decision in the First Dictum of the Decree of the Minister of Agrarian Affairs / Head of BPN No 18/HGU/BPN/1996 dated 31 May 1996
 - Based on Law No. 5 of 1960, Regulation of the State Minister of Agrarian Affairs/Head of BPN No. 2 of 1993, the decision of the Minister of Agrarian Affairs/Head of BPN No. 21 of 1994, that land title (HGU) can be granted for a maximum period of 35 years
3. Letter from the Governor of Kalimantan Barat No 525/4484/DISBUNNAK/2021 dated 23 December 23, 2021 regarding conflict settlement solutions between PT. BPK with community around the concession, which described
 - The Governor does not have the authority to propose the extension of the land title (*Hak Guna Usaha (HGU)*)
 - The problems that occur between PT. BPK with the Farmers Group of Sungai Enau Village should be settled with to be as soon as possible by taking into account:
 - a. Letter of the Governor of West Kalimantan No. 525/6947/DISBUN/II/2021 dated 16 March 2021, regarding the prevention of plantation dispute
 - b. Letter from Kubu Raya Regent's No. 590/1468/Setda-A dated 03 August 2021 regarding conflict settlement solutions between PT. BPK with Sungai Enau Village Farmers Group
 - c. Letter from the Head of National Land Agency Regional Kalimantan Barat Province BPN No. HP.01.03/991-61/VII/2021 dated 16 August 2021 regarding the explanation of the land title process in PT.BPK in Kubu Raya Regency

Based on auditor verifications the process of settlement has been carried by the company in accordance with procedure that owned. The company 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

A part from the plantations themselves, the company also receives FFB supplies from other parties in the form of plasma / scheme smallholders and independent smallholders or outgrowers. For plasma or scheme smallholders, the price agreement mechanism has been determined in the cooperation agreement letter (Letter of Agreement) between the two parties where all the FFB produced by the supplier to the company is in accordance with the price formula set by the government. Furthermore, for independent smallholders or outgrowers FFB price are stipulated in work agreement that agreed by both parties. Some considerations in determining the price of FFB such as CPO prices, transportation costs, and the proposed price from the supplier. The pricing mechanism has been explained in the FFB purchase agreement which was signed by both parties. The interview with management unit also obtained information if FFB prices that has been determined are available and could be accessed by suppliers, information on price changes was made via SMS, WA and telephone to the supplier's PIC.

Based on the results of document review and interviews with the company, information was obtained if FFB Price could be accessed by farmers directly from the Plantation Office or from the Plasma Assistant through communication media. In addition, the company also has a price delivery mechanism to farmers in the form of direct information by the Plasma Assistant who visits farmers every day which is conveyed directly to the Cooperative Management.

5.1.2

Based on an interview with Mekar lestari cooperative is known by the that the price of FFB from Mekar Lestari cooperative was in accordance with prices set by the Plantation Agency and in accordance with the agreement of both parties and there are no complaints regarding the payment of FFB. The Regular updating of FFB prices to cooperation via Whatsapp group and directly short message send to member, every 2 weeks.

Based on an interview with the management of Mekar Lestari cooperative, it was informed that the management knew the price of FFB because they participated in the determination meeting.

5.1.3

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

5.1.4

Base on document verification on The agreement letter between the company and Mekar Lestari and Tuah Jubata cooperative has been known and signed by representatives of both parties and one is a woman who is a member.

The Cooperation Agreement was signed by the company and the cooperative and acknowledged by government agencies including the West Kalimantan Provincial Plantation Office, the Regent of Pontianak City, the Kubu Raya District Plantation Service, the Kubu Raya Cooperatives and UMKM Office and the Kubu Raya Regent.

5.1.5

The price of FFB is in accordance with the price set by PT. BPK collaborates with plasma plantations, namely KUD Mekar Lestari (SPK No. 23 / BPK-DIR / PK-II / 98 dated February 12, 1998) and KUD Tuah Jubata (SPK dated February 25, 2015). These cooperation agreements start from the development of plantation and the sale and purchase of FFB during one crop cycle (until the plant productivity runs out = \pm 25 years). In terms of operational management carried out by the company as long as the farmer's credit has not been paid off. For KUD Mekar Lestari, currently the management has been handed back to the farmers because the credit has been paid off as indicated in letter No. 162 / MBB / HEB / 2010 dated 11 May 2010 from Bank CIMB Niaga and letter No. 057 / PLM-Ext / XI / 12 dated 16 November 2012 from PT. CPC. For KUD Tuah Jubata, currently it is still managed by PT. BPK because the credit has not been paid off.

5.1.6

The mechanism related to the price, the weight of FFB paid and the number of farmers who are paid is that a Minutes of Completion of Calculation of FFB sales of Plasma Estates is always held every month. Minutes are made according to the agreement between the company and the plasma cooperative. The Minutes contains the calculation of the net proceeds and also explains in detail the following deductions and the amount paid.

The company shows the Minutes of payment from the sale of FFB from plasma plantations by PT BPK for the period April 2022. The minutes of FFB sales have included the results of FFB sales for that period after being subject to tax deductions and operating costs. In accordance with the agreement in the agreement that the installment of investment costs is 50%, the funds paid to the cooperative will be transferred to the cooperative's bank account. The minutes are signed by the cooperative and the company.

The company every quarterly period makes a presentation related to the results and an explanation of the costs of plasma plantation products. This is indicated by the minutes of the presentation of the results and an explanation of the operational costs of plasma plantation results in the first quarter of 2022 which was attended by representatives from the cooperative and the company. In this activity, the

calculation of the results of the cooperative's operations with the remaining outstanding debt is explained. Payment has been made and can be proven through a receipt for payment.

5.1.7

The company has tested the electronic weigh bridge which was carried out on April 20, 2022 by the Head of Department of Trade and Industry, Kubu Raya Regency and valid until April 18, 2023 with evidence, among others:

- Test Result Certificate number 510.3/059/MET-B/SKHP/TU/TIMB/IV/2022 for serial number 201550407 with a maximum capacity of 30,000 Kg.
- Test Result Certificate number 510.3/058/MET-B/SKHP/TU/TIMB/IV/2022 for serial number 124151242 with a maximum capacity of 30,000 Kg.

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

5.1.8

The company has carried out socialization related to RSPO certification to cooperatives / plasma farmers through annual meetings between the company and the community. The company shows the Minutes of the annual meeting on 24 May 2021 involved Sungai Enau Village and Mega Timur village which was attended by the company, village government, community representatives and cooperative farmers.

5.1.9

The handling of complaints from all parties is described in the Procedure for Management/Handling of Complaints and/or Complaints Document Number SOP 60/WIP-KB/(0)/0915 which was approved by the General Manager effective as of September 1, 2015. The purpose of this procedure is, among others, for complaints/ Complaints received by the company are in the form of identification of complaints/complaints in search of alternative solutions, selection of solutions, implementation and resolutions that arise or occur due to the presence, existence of the company with all forms of business activities. This SOP explains the principles of handling complaints/complaints, namely, Confidentiality of perpetrators, tiered, transparency, accountable, objective, fast, accurate and recorded.

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

Status: Comply

5.2

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

5.2.1

The company has carried out socialization related to RSPO certification to cooperatives farmers through annual meetings between the company and the community. The company shows the Minutes of the annual meeting on 24 May 2021 involved Sungai Enau Village and Mega Timur village was attended by the company, village government, community representatives and cooperative farmers. Base on interview, the farmer cooperatives have understood consist of:

- Sustainable oil palm cultivation
- Implementation of the sustainability system in oil palm plantations (RSPO)
- The introduction of non-environmentally friendly agricultural materials
- The anticipation and management of forest and land fires

5.2.2

The program development and implement livelihood improvement programs, including at least capacity building to increase productivity in describing on the work program cooperative Mekar Lestari cooperative and Tuah Jubata cooperative for the period 2020 until 2021. The program included, OHS, IPM, Best Management Practice and RSPO requirement. The last evaluated program on 24 May 2021.

5.2.3

The company shows the Minutes of the annual meeting on 2021 in involved Sungai Enau Village and Mega Timur village which was attended by the company, village government, community representatives and cooperative farmers. The meeting of minutes describes process legality of the land.

5.2.4

The certification unit shows the document for socializing the use of pesticides to the surrounding community and plasma farmers on November 27, 2021 at the Megah Timur Village Hall. The socialization was attended by 35 people who are plasma farmers. Based on document verification of the socialization material document revealed that one of the materials provided was related to handling pesticides and how to apply them safely. During audit activities, the certification unit shows attendance lists, documentation, and training materials.

5.2.5

The company shows reports related to the realization of production and sales value of FFB from the Mekar Lestari Plasma Estate and the Buah Jubata Cooperative for the period of 2021. The report contains related to FFB production, prices, and deductions from income from taxes, maintenance, wages, harvesting, transportation and general. The evidence that indicate the unit of certification regularly reviews and publicly reports on the progress of the smallholder's support programme has been explained on annual budget meeting period 2021 dated on 24 May 2021.

Status: Comply

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

CH has a commitment to respecting human rights and describe in the Equal Employment Opportunity Policy review on January 2018, it stated that Wilmar International committed to provide equality in employment opportunities to every employee. It also stated that the company's beliefs and labor standards confirm that the company will not discriminate in every decision-making related to all workers, promotion or retire works/candidates based on race, color, sex, age, social class, religion, sexual orientation, politics, or disability.

Based on the workers' recruitment document, unit certification had provided equal opportunities in recruitment and operational activities. In addition, in Company's Regulation period 2020-2022, it stated the qualifications of workers and there were no requirements that refer to discriminate against gender, race or ethnicity, disability, sexual orientation, age, or belief.

6.1.2

The certification unit shows an employee list document that informs religion, ethnicity and gender for the period April – June 2022. From the document it is known that the employees in each unit come from different regions, for example: Ambon, Bangka, Banyuwangi, Banjarmasin, Blitar, Boyolali, Ciamis, Cilacap, Jambi, Jember, Kebumen, Karawang, Kendal, Kediri, Kupang, Lampung, Lombok, Majalengka, Mojokerto, Pontianak, Gresik, Medan, Purworejo, and South Sulawesi. From the document it is also known that the employees who work consist of Muslims, Catholics, Protestant Christians, Hindus and Buddhists.

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

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

6.1.3

During recruitment process, the company had set the standard of competence that required based on the position offers. Selection had included evaluation towards skills, performance, and medical test result. Furthermore, promotion is conducted based on work period, annual evaluation result and availability of position. All workers are treated equally in accordance with company regulation including rights of worker as well.

Records on manpower procedure had been documented, as verified randomly to the several documents, as follows:

- The certificate holder showed recruitment document such as job hiring announcement, the score of interview test, the health certificate, and the work agreement. For example, a worker on behalf of AZ (initial) who started working as a permanent harvester worker with three months of probation on 03 September 2021.
- The certificate holder showed promotion document and management decree for grade promotion. For example, a worker on behalf of MA (initial) who had a promotion based on worker's appraisal, from daily worker to permanent worker on 01 November 2021.

6.1.4

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

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

6.1.5

The certification unit has a gender committee based on the Decree of the Management Unit dated January 11, 2021. A gender committee has been formed chaired by the chair of the committee and coordinators in several sections and there are representatives in each unit. The gender committee structure only consists of female workers, but for builder and supervisors it consists of male representatives, namely unit managers and assistant managers. The main purpose of establishing a gender committee is to provide a forum that can accommodate the aspirations or complaints of workers (women and men), as certification unit partners in carrying out socialization activities related to gender and other policies related to workers' reproductive rights.

Further explained that the gender committee provides support for female employees, including protection and maintenance of women's health, maintenance of family life and welfare, protection from sexual harassment and violence, providing continuing education that gender equality exists in the unit of certification.

Certification unit also showed the policy against sexual harassment, violence, and reproductive rights reviewed on January 2018. It stated that Wilmar International committed to support the reporting of all incidents of sexual harassment, violence, abuse, and violations of reproductive rights experienced by any individual (regardless of gender and age).

6.1.6

The certification unit does not discriminate against workers' rights, this is indicated by the payment of equal wages for workers in the same scope of work. The certification unit issued a decision on the payment of salaries for permanent employees and daily employees in 2021 based on the Decree of the Governor of West Kalimantan No. 1468/DISNAKERTRANS/2021 concerning the 2022 District Minimum Wage. The decree stipulates the minimum wage for the estate and mill sector at IDR 2,467,630. The certification unit in this case shows proof of payment of salary that is equivalent to the scope of work by showing the salary slip for machine room operators and mill security for the period of May 2022 where overtime payments have been paid in accordance with applicable regulations and the working hours of employees, for example overtime for machine room operators with value of IDR 2,301,281 while overtime for security with a value of IDR 3,355,407

The certification unit has also developed a salary structure and scale that applies to employees with more than 1 year of service based on the Internal Memorandum from the Senior HRR Manager with No. 018.a/BPK-HRR/IM/I/2022 dated January 15, 2022. In the document it is known that the highest wages are employees of class 2D with a value of IDR 2,927,630 while the lowest salary is employee of class 2A with a value of IDR 2,467,630

It was further explained that the structure and scale of wages were determined based on years of service and an annual performance appraisal by each supervisor.

Status: Comply

6.2

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

6.2.1

The certification unit shows a sample of job requirements documents for new employees as follows:

1. Job application letter for prospective employees with the initials MD dated June 13, 2022. Attached documents sent by prospective employees are the latest education certificate, police record, identity card, and family card.
2. Confirmation of application for new employee acceptance with initials MD. The document explains the work location, position, class and wages that will be received every month.
3. Work Agreement between PT BPK and the employee with the initials MD. The document explains the duties and responsibilities of employees, rights obtained by employees and the term of the work agreement.

4. A doctor's certificate stating that the employee with the initials MD has undergone a medical examination with the results being healthy and ready to work.

In addition, provisions related to work agreements have been contained in the Company Regulation, including regulating the rights and obligations of workers listed in detail, workers accepted have a minimum age according to applicable regulations, PPE obligations, working hours, overtime, maternity leave, facilities provided to workers. and *BPJS*. It was further explained that the work agreement was written in Indonesian and signed by the worker and the certification unit.

Based on verification document of the estate and mill employees for 2021-2022 show that there are 2 types of employees who work within the certification unit's scope, namely permanent workers and casual daily workers. Further explained that all casual daily worker work agreements have been registered at the local manpower agency, for example: registration of casual daily worker work contracts with the initials SD on December 24, 2021.

The certification unit already has a Company Regulation (*PP*) for the period of 2021-2023 which has been ratified based on the Decree of the Head of the Manpower and Transmigration Office of Kubu Raya Regency No. 169 of 2021 dated September 10, 2021.

Based on field observations and interviews with employees in the estate and mill areas, it is shown that each employee has a work agreement with the certification unit and has understood the rights and obligations of being an employee of the certification unit. It was further explained that each employee had received wages in accordance with Company Regulations. In addition, the basic wages of employees have also referred to the structure and scale of wages. In previous assessment (ASA3) there are NC about the compliance of minimum wage for harvester and its has been verify during this assessment where Based on field observations and interviews with mill and estate employees revealed that the certification unit had paid employee wages and overtime in accordance with applicable regulations

6.2.2

The certification unit shows the Company Regulation of PT Bumipratama Khatulistiwa for the period 2021-2023 which has been ratified based on the Decree of the Head of the Manpower and Transmigration Office of Kuburaya Regency No. 169 of 2021 dated September 10, 2021. The Company Regulation explains several things, including: work relations, employee career management, working days and hours, overtime work, leave, wages, workforce development, social security, OHS, work procedures for resolving complaints and industrial relations disputes. The Company Regulation has been conveyed to all workers through socialization carried out in stages in estate and mill starting from October 2021 - December 2021.

The certification unit shows a sample of casual daily worker contract documents as follows:

1. SPK dated October 1, 2021 for employees with the initials AB.
2. SPK dated October 23, 2021 for employees with the initials MW.
3. SPK dated October 1, 2021 for employees with the initials MB.
4. SPK dated October 1, 2021 for employees with the initials MF.
5. SPK dated December 21, 2021 for employees with the initials SD.
6. SPK dated September 1, 2021 for employees with the initials DN.

Based on document verification show that all casual daily worker contracts are in accordance with applicable regulations and have been registered with the local manpower agency, for example: registration of casual daily worker work contracts with the initials SD on December 24, 2021.

Based on field observations and interviews with estate, and mill employees showed that all employees had received Company Regulation socialization and understood the contents of the Company Regulation.

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

6.2.3

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

1. Mill employee salary slip with employee number 0210 for May 2022 period. The salary slip explains that employees get a basic salary in accordance with the prevailing wage structure and scale and receive benefits, attendance incentives and overtime whose

calculations are in accordance with applicable regulations.

2. Maternity leave document for 3 months in accordance with the Company Regulation, where maternity leave is granted from 11 Desember 2021 - 11 March 2022.

Auditors verify employee rights, for example:

1. Certificate of Maternity Leave for employees with the initials LS who are on leave from December 11, 2021 until March 11, 2022.
2. Notification letter for employees who are sick from the certification unit clinic after conducting a health check on March 22, 2022. It is further explained that employees are given time to rest for 1 day.
3. Based on interviews with management revealed that in the last 1 year there were no cases of dismissal of employees either in the estate or at the mill.

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

6.2.4

The certification unit provides facilities and infrastructure for employee welfare, such as housing, polyclinics, clean water, sports fields, educational facilities, and places of worship. Based on interviews with estate, and mill employees revealed that the infrastructure provided by the certification unit was adequate and proper. Based on field observations to employee housing are known that the house is in good condition, the drainage channel is quite good, and the domestic waste management is regular.

6.2.5

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

6.2.6

The certification unit has calculated the prevailing wages and in-kind benefits based on the guidelines issued by the RSPO. Prevailing wages are taken from prevailing wages such as basic wages/ minimum wages. Meanwhile, in-kind benefits are taken from all costs incurred by the certification unit for the provision and maintenance of facilities provided by the certification unit to employees, such as electricity, housing, water, schools, health facilities, and baby care. For example, to calculate the in-kind benefit of housing, the costs considered in the calculation include building material costs, construction costs, and including maintenance costs for 25 years (technical considerations of buildings are feasible to use). The calculation result of prevailing wages and in-kind benefits received by employees is IDR. 3,802,986/month (Minimum wages in 2022, IDR. 2,467,630/month + in-kind benefit, IDR. 1,290,681/month).

6.2.7

Based on document review show that the certification unit has determined the type of permanent work by referring to the GAPK/Decree No. SK/002/PPG/II/2013 concerning the flow of work implementation processes in the oil palm plantation business sector. In the attachment to the decree, it is explained that the work of harvesting and processing FFB into CPO is the main activity. Based on field observation and interviews with harvester in Phase 3 Block 127, it was found that casual workers have been working since October 1, 2021. During the audit process, the certification unit was able to show a list of plantation employees for the period of June 2022, from the list of employees it was found that there were 35 harvest employees. with the status of casual workers who have started working since 2021 until now, for example employees with work agreements as follows:

1. SPK No. dated October 1, 2021 for employees with the initials AB.
2. SPK No. dated October 23, 2021 for employees with the initials MW.
3. SPK No. dated October 1, 2021 for employees with the initials MB.
4. SPK No. dated October 1, 2021 for employees with the initials MF.
5. SPK No. dated December 21, 2021 for employees with the initials SD.
6. SPK No. dated September 1, 2021 for employees with the initials DN.

The certification unit has not been able to show evidence that the main work has been done by permanent workers. **Based on that's explanation raised non conformity No 2022.02 with Minor Category**

6.2.7	Status: NCR No. 2022.02 with minor category
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6.3

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

6.3.1

The certification unit has had a commitment due to respecting human rights stated in the Human Rights Policy. This policy explained that Wilmar International is committed to provide all labor's rights specifically to establish free, open, independent, democratic and responsible trade unions. The policy is publicly available on the certification unit website in two languages (Indonesian and English), and has been gradually disseminated to all workers on 22 November – 30 December 2021. The certification unit can show the socialization documents and documentation of the activity.

Based on interviews with the management of the *Serikat Buruh Sejahtera Indonesia (SBSI)* revealed that the union also covers casual daily worker status. Regarding the exclusion of casual daily workers from the *BPJS Kesehatan* program, the labor union had previously communicated with the certification unit but the certification unit still referred to the letter from *BPJS Kesehatan* No 2284/IV-02/1216 dated December 20, 2016 regarding the directives of casual daily workers. Where in the letter it is explained that: casual daily workers cannot be grouped into wage recipient workers who pay health insurance contributions of 5% of the salary or wages received regularly every month where 4% is paid by the employer and 1% is paid by the worker.

Based on interviews with estate and mill employees revealed that each worker had received an understanding regarding freedom of association and the right to collective bargaining.

6.3.2

Regarding opportunities for improvement in the Surveillance-3 assessment related to worker union meetings, the certification unit explained that meetings are only held when there are matters that need to be discussed with other members. In this case, the certification unit shows an example of documenting a worker union meeting, for example:

- Meeting on March 25, 2022 with the main discussion regarding the use of a first aid kit when an accident occurs in the field.
- Meeting on April 23, 2022 with the main discussion regarding the replacement of employee PPE that has been damaged and is not suitable for use as body protection while working.
- Meeting on May 27, 2022 with a discussion regarding the storage of work tools during breaks in the field.

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

6.3.3

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

Status: Comply

6.4

Children are not employed or exploited.

6.4.1

The certification unit has a Child Protection Policy signed by Chief Sustainability Officer of Wilmar International in November 2017, which states that Wilmar International does not tolerate child labour, any form of child exploitation and child abuse. The certification unit has committed to prohibiting the use of child labor and forced or compulsory labor in its operations. In addition, child labor clauses apply across Wilmar's global operations, including subsidiaries, joint ventures and third party suppliers. In addition, the CLA also states that the recruitment requirements for new employees must not be under the age of 18.

This policy has been socialized to all employees in each estate, mill and local contractor. The certification unit can show documentation, attendance list and information dissemination of the policy.

6.4.2

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

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

6.4.3

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

6.4.4

Based on interviews with the gender committee and workers in the field revealed that the workers had understood the rules regarding the prohibition of bringing children to work. The certification unit also showed the news of the socialization and education on child protection and development on April 22, 2022 attended by 23 participants.

Status: Comply

6.5

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

6.5.1

The certification unit has a Policy on Sexual Harassment, Violence and Abuse, and Reproductive Rights signed by the Chairman and CEO in January 2018, which states that Wilmar International strives to provide a conducive work environment characterized by equality and mutual respect, and encourages reporting of all incidents sexual violence and harassment, and violations of reproductive rights experienced by every individual. The Women's Working Group (WoW) was formed to provide support for female workers against sexual harassment and violence and to communicate and communicate the policy to all workers.

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

6.5.2

The certification unit has a Sexual Harassment, Violence and Abuse, and Reproductive Rights Policy that was signed by the Chairman and CEO in January 2018. The policy states that Wilmar International strives to provide a conducive work environment characterized by equality and mutual respect, and encourages reporting of all incidents of violence. and sexual harassment, and violations of reproductive rights experienced by each individual. The Women's Working Group (WoW) was formed to provide support for female workers against sexual harassment and violence and to communicate and communicate the policy to all workers. Furthermore, The certification unit has a gender committee based on the Decree of the Management Unit dated January 11, 2021. A gender committee has been formed chaired by the chair of the committee and coordinators in several sections and there are representatives in each unit. The gender committee structure only consists of female workers, but for builder and supervisors it consists of male representatives, namely unit managers and assistant managers. The main purpose of establishing a gender committee is to provide a forum that can accommodate the aspirations or complaints of workers (women and men), as certification unit partners in carrying out socialization activities related to gender and other policies related to workers' reproductive rights.

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

6.5.3

The certification unit shows the document for the list of new mothers in 2022. From the list, it is known that from January to June 2022 there were 1 employee. Furthermore, the certification unit showed the document Identification of the Needs of New Mothers in which the assessment was carried out on 21 employees who were pregnant since 2021. From the results of the assessment, several things were known as follows:

1. Provision of a lactation room.
2. Provide breaks for breastfeeding.
3. *Posyandu* for children and mothers.
4. Breastfeeding counseling.
5. Work placement near linesite
6. Job transfer for pregnant and lactating women.
7. Extra fooding for new mothers giving birth.

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

6.5.4

The certification unit showed the procedure to accommodate complaints and grievances from employees specifically in sexual harassment and violence (No. PRO-HD-004 rev-03) validated on 1 September 2021. In the procedure described that if requested, the certification unit guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).

Besides that, the certification unit has formed gender committee for handling the harassment issue around female workers. Complaint can be submitted to board of gender committee, or their foreman. Based on interview with the board of gender committee, the certification unit provides the female worker with menstrual leave, pregnant and nursing leave for about 3 months. Pregnant and nursing female worker is prohibited to work related to chemical. And also, certification unit give special breast feeding time for female worker, but prohibit the worker from working with chemical material.

	Status: Comply	
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6.6

No forms of forced or trafficked labour are used.

6.6.1

Based on interviews with operational staff revealed that all employees were those who passed the recruitment and selection process according to certification unit procedures and requirements. Certification unit post job vacancies then prospective workers come voluntarily to apply for jobs that are available for free and there is no holding of identity documents. Overtime is monitored by the certification unit and workers are given the freedom to choose overtime. The certification unit also does not force or make it difficult for employees to resign. There is no penalty for termination if they wish to terminate the contract early.

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

6.6.2

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

	Status: Comply	
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6.7

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

6.7.1

The certification unit shows the document ratifying the OHS committee organizational structure through the Decree of the Head of the Manpower and Transmigration Office of West Kalimantan Province with No. 560/1989/Disnakertrans-D dated November 25, 2021. The document explains that Muldianto and M. Fibriyanto is the secretary of OHS committee. The certification unit in this case shows the following documents:

- Decree of the Minister of Manpower of the Republic of Indonesia with No. 5/33494/AS.02.04/III/2021 dated March 18, 2021 regarding the Appointment of OHS Expert on behalf of Mulyadianto and valid for 3 years from the date of stipulation.
- Decree of the Minister of Manpower of the Republic of Indonesia with No. 5/33495/AS.02.04/III/2021 dated March 18, 2021 regarding the Appointment of OHS Expert on behalf of M. Fibriyanto and valid for 3 years from the date of stipulation.

Certification unit can show regular meeting activities, including:

- OHS Committee Meeting held on January 27, 2022. The topic of discussion are HIRAC review, emergency equipment review and EHS training review. The activity was attended by 15 participants.
- OHS Committee Meeting held on February 24, 2022. The topic of discussion are EHS training review, house keeping assessment, and EHS performance simulation. The activity was attended by 14 participants.

- c. OHS Committee Meeting held on March 29, 2022. The topic of discussion are permit to work review, discussion of action plans related to DLH Kuburaya visit on 17 February 2022. The activity was attended by 16 participants.

6.7.2

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

The certification unit has also provided workers who are assigned to the field and other work locations and have received First Aid training. In addition, the certification unit has a licensed first aid officer with certificate number 807/P3K/XII/13 and 1550/POHS-P3K/IV/2015. These first aid officers then giving annual first aid training to the supervisors in the Mill and Estate. Based on field observation, the supervisor has been given first aid kit and can demonstrate the first aid handling.

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

Auditors have checked and verified documents regarding the availability of First Aid Kits at estates and mill. The verification results show that the certification unit has provided First Aid Kits with various packages as required by PER.15/MEN/VIII/2008 attachment 5 (Boxes type A, B, and C), for example the number of First Aid Kits at Estate is 27 boxes with 668 employees while the number of First Aid Kits at Mill is 3 boxes with 104 employees. The certification unit shows the First Aid Kit inspection data at BPK Estate for the period of March 2022 which states that all the items in the First Aid Kit are in complete condition, none of which have expired and all item are ready to be used.

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

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

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

6.7.3

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

It was further explained that the certification unit had disseminated PPE SOPs to employees, for example the OHS Socialization and Use of PPE on May 17, 2022 which was attended by 87 workers. The certification unit can show the documentation, attendance list and socialization materials.

In addition, the certification unit also showed samples of the PPE handover documents for 2022 through the PPE Handover Minutes document on January 10, 2022 for safety helmets, boots, harvesting tool, and gloves. The certification unit also shows sample documents for employee PPE replacement through the Minutes of PPE Replacement document on April 28, 2022, for boot.

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

Based on field observations at Bumipratama Khatulistiwa Estate revealed that the certification unit has provided sanitation facilities for pesticide applicators, so that pesticide applicators can change PPE, wash and wear personal clothes. It was further explained that pesticide applicators were prohibited from returning home before cleaning themselves in the chemical mixing room and bathroom.

6.7.4

Based on verification document and interviews with management and workers both casual daily worker and permanent worker it is known that all workers have received work accident insurance through *BPJS Ketenagakerjaan*, this is proven by being able to show proof of *BPJS Ketenagakerjaan* payments for casual daily worker and permanent worker.

Meanwhile, health services for permanent worker have been included in the *BPJS Kesehatan* program. Meanwhile, for the casual daily worker, certification unit show a letter from *BPJS Kesehatan* No. 2284/IV-02/1216 dated December 20, 2016 concerning the Directives of Freelancing Casual Daily Workers which explains that:

1. Casual daily workers cannot be grouped into wage-earning workers whose payment of health insurance contributions is 5% of the salary or wages received regularly every month where 4% is paid by the employer and 1% is paid by the worker.
2. If a business entity wishes to include casual daily workers (BHL) into *BPJS Kesehatan*, the health insurance guarantee is in accordance with the provisions as non-wage workers.

Based on verification document of *BPJS Kesehatan* payment documents are known that the certification unit only includes Permanent Worker, for example

1. Payment proof of *BPJS Kesehatan* for estate employees for the March 2022 period which was paid on April 8, 2022 for 546 employees while the number of employees is 668 employees so there is a difference of 122 employees who are not paid.
2. Payment proof of *BPJS Kesehatan* for estate employees for the April 2022 period which was paid on April 8, 2022 for 546 employees while the number of employees is 663 employees so there is a difference of 117 employees who are not paid.
3. Payment proof of *BPJS Kesehatan* for estate employees for the May 2022 period which was paid on May 11, 2022 for 545 employees while the number of employees is 662 employees so there is a difference of 117 employees who are not paid.
4. Payment proof of *BPJS Kesehatan* for estate employees for the June 2022 period which was paid on June 10, 2022 for 543 employees while the number of employees is 668 employees so there is a difference of 125 employees who are not paid.

Based on interviews with management and casual daily workers if there are workers who are sick can be treated at the Company Clinic for free. However, the certification unit has not been able to explain the treatment if the patient requires further action if it cannot be handled at the certification unit clinic.

The certification unit has not been able to show evidence that all workers have been provided with health services that are equal to all employees. **Based on that's explanation raised non conformity No 2022.03 with Minor Category**

6.7.5

Based on the verification of work accident documents for estate and mill for the period January-June 2022 it was found that there were 7 cases of work accidents with 12 days missing. From the work accident data, it is known that the FR value is 2 and the SR value is 3. The certification unit can show claim data for each work accidents.

6.7.4	Status: NCR No 2022.03 with Minor Category	
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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 Operational Procedures for Observing and Controlling Diseases as stated in the Manual of Agriculture & Standard Operating Procedures for Oil Palm Plants in Chapter 8 on Plant Protection - Pest and Disease Control. The agronomic operational procedures explain the types of pests and diseases, the period of detection/observation (1 or 2 months), the threshold for controlling pests and diseases, the method of sampling at the time of observation or census, as well as recommendations for control. In this procedure it is explained that pest monitoring activities are carried out once or twice a month. The Company has a Procedure on Census Observing Pests and Diseases of Oil Palm which aims to ensure pest and disease control programs, Pest and Disease monitoring; Pests and Diseases Census, cultivation of beneficial crops, reporting and documentation carried out regularly and

continuously. IPM operational programs carried out by the company include Pest/EWS monitoring programs which are carried out regularly every two months and if there are symptoms of high/severe attacks, IPM is held every month and useful plant maintenance activities are carried out every month.

Census and Pest Control IPM

- Based on the study of Monitoring & Control of Oil Palm Leaf-Eating Caterpillars to Date May 2022 from an area of 4,430.28 hectares of oil palm plantations, it is known that there was an attack with a mild category (1-5 Larvae) covering an area of 157.28 Ha with samples found in Division 1 Block M2-113A s /d M2-113E and Division 2 in Blocks M2-131A to M2-131E and has been controlled for an area of 157.28 Ha using the Mistblower method with Capture/Prevatohone, Trunk Injection using Chepate, Fogging using Matador, PB16 using Captur and Light Trap.
- Based on the study of census documents and control of rat attacks, in February 2022 it was found that there were attacks of >5% covering an area of 1,151.77 Ha with a total of 72 blocks from 2 divisions (Division 1 = 27 Blocks and Division 2 = 45 Blocks). With a census sample and control using rat poison, racumin comatetrallil, found in Division 1 Blocks M5-105A to M5-105E and Division 2 Blocks M2-144A to M2-144E in the control process until May 2022, covering an area of 1,151.77ha.
- Based on the review of the summary document on the control of Tirataba Mundela / oil palm fruit borer in May 2022, it is known that there were mild attacks with examples of attack samples in Division 1, phase 1 covering an area of 488.89 hectares and phase 2 covering an area of 592.12 hectares. The control of the Tirataba Mundela attack in the 1st division has been carried out with a total area of 1,081.01 Ha and the entire control is carried out in 2 stages.
- Based on a review of the 2022 pheromone trap monitoring summary document from January to May 2022, 333 oryctes were found with 33 pheromone traps in good condition.
- Based on the review of the summary document on the control of Fungus/Ganoderma in May 2022, it is known that there was a mild attack with an attack sample of 1,056.10 Ha. Ganoderma attack control has been carried out with a total area of 259.40 Ha and all ganoderma control is carried out every month on an average of 51.88 Ha. .

Biological Control

Based on information on document review and management unit interviews that the plan and realization of beneficial plant planting has been carried out. The company has used beneficial plants including cassia cobanensis/ cassiadora and turnera subulata/ ulmifolia, asystasia gangetica as biological pest control and vetiver grass as an erosion control plant.

Based on information from a review of monitoring Gupon tyto Alba documents as of May 2022, it is known that the company has 28 owl nests and 10 of them are active with 10 owl brooders, 16 eggs and 6 chicks.

Based on information from the document review that the IPM Plan is implemented and monitored to ensure effective pest control by conducting Census and Pest Control, as well as biological control.

7.1.2

Units of certification using beneficial plants include the species Turnera subulata (6 plants/Ha), Cassia cobanensis, Cassia tora (4 plants/Ha), Vetiver Grass (erosion-retaining plants) which are classified as invasive species based on the LHK Ministerial Regulation No.P. 94/MENLHK/SEKJEN/KUM.1/12/2016 concerning Invasive Types. Companies can show records of Benefecial Plant monitoring in nurseries, plantings to prevent and monitor their spread.

The company also conducted a socialization on the management and control of invasive species on March 16, 2022 which was attended by 24 participants, explaining the types of invasive species in the company's operational areas.

Based on document review information that the company does not use invasive species that are introduced according to government regulations in force in the managed area

7.1.3

Based on information from document review, field observations, and interviews with workers and stakeholders, it is known that the company does not use fire to control pests.

Status: Comply

7.2

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

7.2.1 & 7.2.5

The unit of certification, Bumi Prima khatulistiwa Estate, has provided justification for the use of all pesticides. By prioritizing specific products and specific application methods to deal with pests, weeds or diseases that are the targets of the 2021-2022 list of selective pesticides used, some sample samples include:

Pesticide	Active Ingredients	WHO Class	Target
Herbicides			
Tiara 20 WG	Metil Metsuluron 20%	III	broadleaf weed
Garlon 670 EC	Triclopyr Butoksi Etil Ester 670 g/l	III	broadleaf weed, woody growth
Supremo 480 SL	Isopropilamina glifosat 480 g/l	III	broadleaf weed, narrow leaf weed
Basta 150 SL	Amonium Glufosinat 150 g/l	III	broadleaf weed, narrow leaf weed
Kenly 20 WG	Metil Metsuluron 20%	III	broadleaf weed
Fungicides			
Anvil	Heksakoazol	III	Root rot disease
Insecticides			
Capture 50 EC	Cypermethrin 50 g/l	II	Needle Worm, bag worm
Penalty 50 EC	Fipronil 50 g/l	III	Termit
Matador 25 EC	Lamda sihalotrin 25 g/l	II	Needle worm
Chepate 75 SP	Asefat 75%	II	Needle Worm, bag worm
Regent 50 SC	Fipronil 50 g/l	II	Termit
Prevaton 50 SC	Klorantraniliprol 50 g/l	III	Needle Worm, bag worm
Marshal 5 GR	Kalbosulfan 5%	II	stem borer
Dipel SC	Bacilus Thuringiensis	III	Needle Worm, bag worm
Rodenticides			
Racumin	Coumatetralyl	III	Rat

Based on the list of pesticides used, it was found that there was no use of pesticides that were included in the list of the World Health Organization (WHO) Class 1A or 1B or included in the Stockholm or Rotterdam Conventions, as well as paraquat.

7.2.2

The Certification Unit has documented pesticide toxicity records in the 2021-2022 Monthly Pesticide Toxicity Data document. The document records the product name, active ingredient, LD50, percentage of active ingredient, number of applications, amount of active ingredient, FFB production and pesticide unit/kg FFB. This document is continuously recorded and updated by the Estate Sustainability Officer every month in 2021-2022.

No	Name Of Chemical	Unit	Date of 2020	Date of 2021	Date of 2022
1.	Spreader	Liter	281.59	126.45	19.00
2.	Regent	Liter	60.00	30.00	5.00
3.	Racumin	Kg	5,944.95	7,250.00	2,004.00
4.	Bravo	Liter	-	-	-
5.	Glimax	Liter	2,000	-	-
6.	Tiara	Kg	468.17	71,83	-
7.	Capture	Liter	267.00	219.00	17.00
8.	Penalty	Liter	-	28.00	2.00
9.	Dipel WG	Kg	438.00	320.00	0
10.	Chepate	Kg	488.00	316.00	256.00
11.	Anvil	Liter	6.00	47.00	-
12.	Phrevaton	Liter	23,50	98.00	14.00
13.	Matador	Liter	197.00	387.00	34.00

14	Supremo SL	Liter	7,500.00	9,404.07	3,759.00
15	Starlon	Liter	182.00	-	-
16	Feromonas	Pieces	-	-	33.00
17	Marshall	Kg	-	100.00	40.00
18	Dipel SC (Ltr)	Liter	-	20.00	90.00
19	Kenly (Kg)	Kg	-	396.00	188.50
20	Basta	Liter	-	40.00	-
21	Garlon	Liter	-	38.00	54.00
22	Icon	Liter	-	1.00	-
23	cozep	Kg	-	6.00	7.00
24	Sime RB pheromone	Pieces	-	33.00	33.00
25	Kencis	Liter	-	-	51.00
26	Inteam	Liter	-	-	20.00
27	Marfu – P	Kg	-	-	560.00

Based on the information from the document review, the company has available records of pesticide use (including the active ingredient used and the LD50 of the active ingredient, treatment area, amount of use of active ingredient per hectare and number of applications). This document is routinely carried out regarding recording and is updated by the Estate Sustainability Officer every month in 2021-2022.

7.2.3

The unit of certification has a program to control the use of pesticides which is minimized in accordance with the IPM plan to reduce the use of pesticides covered in the SOP of Agronomy (No.SA11/EMU/0/1014) by replacing pesticides with biological controls such as using natural predators to control rats and plant which is useful. Based on information from document studies and field observations, several IPM programs with biological approaches have been carried out by the company, including controlling rats with *Tyto alba*, and nettle-eating caterpillars by planting beneficial plants such as *Turnera subulata* and *Casia cobanensis*. In addition, the company has also carried out routine early detection which is listed in the monthly early warning system (EWS) report.

In planning to minimize the use of pesticides by the company, among others, applying Pheromontrap to reduce the population of rhino oryctes. There are 33 pheromontraps in the Bumipratama Khatulistiwa Estate, namely in the division block 201A is 10 pcs, block 212A is 10 pcs, block 113A is 10 pcs and 128A is 3 pcs, Based on the pheromone trap monitoring report, the last monitoring was carried out in May 2022, which was trapped by the oryctes rhinoceros with the results of 40 males and 29 females.

7.2.4

The unit of certification does not use prophylactic methods in the use of pesticides. The company controls using pesticides if the pest attack census shows results above the threshold. In weed control If the field conditions on the circle line and harvest line are still quite standard, weed control will be postponed.

Based on information from interviews with spraying officers that the application method used is not a preventive application but is more selective for locations where weeds are present.

7.2.6

The Certification Unit has carried out training with information on periodic training on pesticide handling to pesticide applicators and foremen as evidenced by the minutes of best practice spraying, Minutes of socializing the use of PPE, Minutes of training on poison mixing for poison mixing officers which was held on 20 May 2022 at Block 111E Division 1 followed by 16 employees of Phase 1 & 2 and Block 127E Division 2 which was held on 19 May 2022 attended by 12 employees of phase 3 & phase 4.

Pesticide application workers have used PPE/personal protective equipment provided by the company in accordance with the specified hazard identification and material safety data sheets including respirator masks, gloves, safety shoes, aprons and goggles. Employees have also been informed with socialization about safe work steps in every roll call in the morning before work.

The spraying workers interviewed also admitted that after spraying they would wash and dry PPE and spraying equipment (spray tanks, jerry cans, etc.), and shower/change clothes in a special place at the division office's rinse house. Therefore, based on field observations of the mixing area in Bumipratama Khatulistiwa Estate, it is known that there is a warehouse to store all PPE and spraying equipment after use.

Based on documents and interviews with unit management, the personnel who provided the training were EHS staff and Agronomy staff

7.2.7

The Certification Unit already has an SOP policy on pesticide storage facilities and working procedures at the pesticide storage area with no. document 14 / WIP-KB / (0) / 0610 revised 0 effective date January 2011. The procedure explains how to make a pesticide storage area, where to mix it, rules for storing pesticides and how to work in a pesticide storage warehouse and the OSH provisions. .

From the results of field observations to the chemical storage warehouse, it is known that the stored chemicals are in accordance with applicable regulations. Found a complete range of MSDS, according to existing stock. Special pesticide mixing stations are also available. The water used for sprayer washing and mixing pesticides can be reused properly. Storage is also equipped with pesticide flow records, appropriate risk symbols, PPE, first aid and firefighting. Based on observations and interviews with chemical officers, former pesticide chemical waste is sent to the B3 waste storage area

7.2.8

The company has an SOP of pesticide storage areas and how to work in the pesticide storage area with no. document 14 / WIP-KB / (0) / 0610 revision 0 on January 2011. The SOP describes the mechanism for storing pesticides in a special warehouse, including a place for mixing pesticides to be used in the field in a special isolated place so there is no potential for chemical exposure to outside the warehouse. Storage of used pesticide packaging is stored in a temporary storage area for hazardous and toxic waste materials and then sent to a licensed collector.

Based on field visits in the pesticide warehouse and the temporary storage area for hazardous and toxic waste in the estate, it was found that the pesticide storage area was well managed, oil traps were available, adequate and isolated airways so there was no potential for pesticide exposure to leave the warehouse. Pesticide waste, such as used pesticide packaging which is classified as hazardous and toxic waste, was also found to be stored in a temporary storage warehouse for hazardous and toxic materials which were properly monitored and then collected to licensed collectors.

Based on interviews with employees and foremen of pesticide application in estate, it was found that all containers used for pesticide packaging were returned and sent to temporary storage places for hazardous and toxic waste materials that were not used for purposes other than pesticide application activities. All used containers, work tools and work clothes are stored in a special storage area. Thus, there are no contaminated items to be taken home. The results of the employee's home observations show that it is not found that the used pesticide packaging is disposed of at the disposal site and is not used for other purposes such as trash cans, flower pots and so on.

7.2.9

Based on document an interview unit management that the sprayers workers on circles and path using selective pesticides three times a year. Based on field observations in PT. Bumipratama Khatulistiwa Estate, it is known if the workers already know the method of selective spraying, for example, only spraying the circle or the existing weeds and if there is no weed, no spraying is carried out. The company also does not apply pesticides by air

7.2.10

PT Bumipratama Khatulistiwa has conducted a special medical examination (cholinesterase) for pesticide operators and is carried out annually at an accredited West Kalimantan Provincial Manpower Service Laboratory. The 2021 inspection has been carried out based on the report in October 2021. The results of the health check are informed to workers and all pesticide operators are in good health

(normal results). In addition, based on interviews with workers, it is known that they have never had a work accident caused by chemicals such as irritants.

7.2.11

Unit certification has had an internal memorandum (No. 058/HRR/INT/V/2012, date May 31, 2012) that prohibits pregnant and breastfeeding personnel working with chemical material. Based on interview with some female spraying personnel, it's known that there was neither pregnant nor lactating female personnel who work with pesticide. However, unit management conducts pregnancy test and examination every three months. Audit team get information by interview in Block I246 Divisi 2 Phase 4 that the personnel have understood that female personnel cannot work with chemical material if they are pregnant or lactating.

Status: Comply

7.3

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

7.3.1

The company has identified waste both from plantation operations and from palm oil mill operations. The resulting waste is classified into hazardous and toxic waste and non-hazardous and toxic waste. The company has identified waste both from plantation operations and from palm oil mill operations. Based on document verification shown company has implemented waste management accordance with waste identification source and management plan for examples are :

- Mill, waste source: FFB process, waste type: shell and fiber (non-toxic/hazardous waste), managed by renewable energy usage for boiler.
- Estates, waste source: pruning activities, waste type: oil palm frond (organic waste), managed by frond stacking.

In accordance with the procedure, the resulting hazardous waste is recorded, documented and stored in licensed storage, based on the results of field visits, hazardous waste was no found stored on other place.

7.3.2

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

- Domestic waste: based on field observation, the company has collected domestic waste periodically and dump it to the landfill and its known that location of landfill is far away from waterways and the housing area.
- The EFB is first processed using a chopper and press to reduce the water and oil content. Before being distributed to the parties, the EFB is placed in a special area in the Mill, the storage area is equipped with a ditch that functions to collect the leachate produced by the EFB, after the leachate has collected in the area it is then pumped into the WWTP pond number 9 in a closed installation. Based on the results of a visit to the POM at the EFB storage area, the auditors verified that the area was a closed area with a machine functioning as a pump for leachate generated from the EFB pile, the area was closed from other water bodies, such as ditches and rivers.
- POME managed on WWTP pond and disposal to surface water, based on the results of interviews with WWTP pond operators and field visits at the WWTP pool, information was obtained that there was no evidence of environmental pollution, there is a safety fence in the WWTP pond, there are maximum POME height limit stakes, there is no POME flow in other areas, there are observation points for POME samples released into the body. water, POME samples are tested monthly and there is also an online integrated digital pH, BOD and COD value meter.
- The company shows the official document for the transportation of medical hazardous waste, dated 22 April 2022 from the BPK clinic to Syarif Mohamad Alkadrie regional general hospital as 21 kg.

The company already has licensed hazardous storage for estates and mills as described in indicator 2.1.1. The company also has a cooperation agreement with a licensed Hazardous waste carrier to transport Hazardous waste produced by the company for estate and mill, consist of:

- Work agreement between PT BPK Mill and PT Primanru Jaya Number 002/BPK/POM-SPK/JP-LB3/II/2022 dated January 20, 2022 which valid 12 month.
- Work agreement between PT BPK Estate and PT Primanru Jaya Number 008/BPK-Estate Pengangkutan dan Pengelolaan LB3/IV/2022 dated January 20, 2022 which valid 12 month.

for the type of hazardous waste that can be transported consists of: used lubricant, used battery, used pesticide packaging, used rag, used lamp, used oil filter, used lamp and medical waste.

The activity of transporting hazardous and toxic waste by a licensed holding company was last carried out on May 13, 202 and the company has been able to show the manifest of transporting hazardous and toxic waste by PT Primanru Jaya, such as from BPK POM as follows:

- Manifest KLHK – 1655234418 for 0.5652 ton of used lubrican.
- Manifest KLHK – 1655239212 for 0.0985 ton of used rags.
- Manifest KLHK – 1655239247 for 0.036 ton of used filter.
- Manifest KLHK – 1655239676 for 0.046 ton of used hazardous container.

Based on a field visit at the Temporary Storage for Hazardous and Toxic Waste, it was found that the POM and Estate Temporary Storage for Hazardous and Toxic Waste had a permanent design with adequate ventilation and a roof that would not be exposed to rainwater and had a watertight floor. The temporary storage place for hazardous and toxic waste is equipped with SOP for storage of hazardous and toxic waste, SOP for emergency response procedures, logbooks, symbols on buildings, safety signs, fire extinguishers, first aid facilities, emergency alarms/bells, lighting lamps and facilities. emergency response tool (spill kit) for spills in the form of sawdust/fiber.

Based on interviews with company management and the Head of the Hazardous and Toxic Waste Warehouse at the sampling location, it is known that they have an understanding of the handling of waste disposal, especially hazardous waste and domestic waste and the management of hazardous waste in accordance with the procedures owned by the management unit. Base on an interview with the manager related to the disposal of domestic waste, by separating organic and inorganic waste. Afterward, fiber and shell are managed by renewable energy usage for boiler and palm oil mill effluent (POME), managed by the effluent pond and land applications as a nutrient cycle.

7.3.3

The company has socialized waste management without burning which was carried out on February 7, 2021. Base on field observation known waste separation is separated based on the type of wet and dry waste, garbage transportation is carried out routinely, waste separation organic and inorganic are adjusted to the appropriate tub then put into the final waste disposal and closed periodically.

Based on the results of interviews with Mill and estate workers, information was obtained that they had understood the prohibition of burning waste.

Base on an interview with the manager related to the disposal of solid waste consist of fiber and shell are managed by renewable energy usage for boiler and palm oil mill effluent (POME), managed by the effluent pond before disposal to watersurface.

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

The unit of certification has an SOP policy on the management of soil fertility in the Estate fertilization section. Meanwhile, there is a soil sampling procedure (SA 12/EMU/(02)/1021, rev 02) dated 10 October 2021 as a guidance for soil sampling analysis.

- Soil sampling is carried out regularly every 15 years or if necessary during replanting, to determine the status of soil fertility in each soil management class group based on the soil survey report document by the consultant.
- The number of soil samples to be taken is determined by the agronomist, considering the relatively similar topographic and climatic conditions for the entire estate, soil samples can be taken per soil management class or soil order or series.

The unit of certification, PT. Bumipratama Khatulistiwa Estate has carried out inorganic fertilization and organic fertilization activities well during 2021-2022 and recorded it in the fertilization realization report for example LSD, Urea, NPK,RP,Bunch Ash, Zincop is fertilizer used by the company. Overall, the company has made efforts to maintain and improve soil fertility. Visually there were no signs of malnutrition in the plants in the blocks visited.

7.4.2

PT Bumipratama Khatulistiwa estate can show records of the Leaf and Soil Analysis that was carried out in February and May 2021 with the following results:

Soil Analysis

Report on the results of the EMU R&D Laboratory test number: 02/TANAH/II/2021/PT. Bumipratama Khatulistiwa, February 3 – March 4, 2021, test date for 12 samples. The parameters analyzed include: pH; C-org; N-tot; P-bray; P-tot; Exc-K Exc-Mg; Exc-Ca; Exc-Na; CEC; KB; LOI; Al-dd and H-dd.

Leaf Analysis

EMU R&D Laboratory test results report number: 36/PLANTS/II/2020/PT. Bumipratama Khatulistiwa on May 3-22 2021 on 99 samples. The parameters analyzed were: Macro (%) N; P; K; Mg; Ca; and Micro (ppm) B; Cu; Zn and Fe. **7.4.3**

Based on the results of interviews with management representatives, it is known that the company does not apply EFB and POME, alternative sources of nutrition are obtained from pruning fronds and plant residues during replanting activities.

7.4.3

Based on information from the results of the document review and interviews with representatives of the management unit, it is known that the company in 2021 and 2022 did not use the EFB application because the EFB processing results were used as fuel for BPK POM and the rest of the processed EFB was also sold as fuel to the initial W company (3rd party) because alternative sources of nutrition are obtained from trimming of midrib and plant residues during replanting activities

7.4.4

The unit of certification, PT. Bumipratama Khatulistiwa Estate has carried out inorganic fertilization and organic fertilization activities well during 2021-2022 and recorded it in the fertilization realization report for example LSD, Urea, NPK, RP, Bunch Ash, Zincop is fertilizer used by the company. Overall, the company has made efforts to maintain and improve soil fertility. Visually there were no signs of malnutrition in the plants in the blocks visited.

No	Type of Fertilizer	Actual (Ton) 2020	Actual (Ton) 2021	Actual sd May 2022 (Ton)
1.	Borate	12.4	85.49	-
2.	Dolomite	1,134.30	789.40	-
3.	COPPER, CHELATED / 022.100.025 Copper	3.05	2,075.00	139.15
4.	R P	43.00	571.40	-
5.	NK2 8.4 / 36 / 022.102.009	1,309.70	80.30	364.90
6.	NPK / 022.103.042	2,814.25	75.60	-
7.	MOP	20.00	1,298.20	-
8.	UREA Urea	14.55	576.55	-
9.	CUSO4	1.93	-	-
10	NPK SUPER K 13-8-27+0.5B	32.55	-	-
11	LSD Kapur	-	37.50	-
12	MOP	-	1,298.20	-
13	NPK Yellow	-	2.80	-
14	Bunch ash	-	80.20	-

Unit certification can show the program and realization of fertilization applications for the period January to December 2021 and January to May 2022. Based on document review and interviews with staff, fertilization realization at PT. Bumipratama Khatulistiwa Estate is in accordance with the program. The fertilization program is in progress and the company is targeting completion based on fertilizer recommendations. The auditor conducted interviews with fertilizer workers at Pt. Bumipratama Khatulistiwa Estate, fertilization activities are carried out manually by workers. The workers can explain the fertilization system and procedures properly, namely in accordance with the dose determined based on the recommendations and prohibitions on fertilization around the river.

	Status: Comply	
7.5		
Practices minimize and control erosion and degradation of soils.		
7.5.1, and 7.5.2		
PT Bumi Pratama Khatulistiwa has analyzed the structure of peatlands based on semi-detailed land survey documents. Soil type maps are found in semi-detailed soil survey documents. The map scale used is 1:50,000.. Based on the latest data for 2020-2021, there is a decree from the Ministry of Environment and Forestry to PT. Bumipratama Khatulistiwa, among others:		
• SK Pippib as of August 2020		
Decree of the Minister of Environment and Forestry No. SK. 4945/MENLHK-PKTL/IPSDH/PLA.1/8/2020 concerning Stipulation of Indicative Map for Termination of New Permits for Primary Natural Forests and Peatlands in 2020 Period II (PIPPIB)		
• SK Pippib as of February 2021		
Decree of the Minister of LHK No. SK. 666/MENLHK-PTKL/IPSDH/PLA.1/2/2021 concerning Stipulation of Indicative Map for Cessation of Business Licensing, Approval for Use of Forest Areas, or Approval for Changes in Designation of New Forest Areas in Primary Natural Forests and Peatlands in 2021 Period I.'		
From the Decree of the Ministry of Environment and Forestry Decree of the Minister of Environment and Forestry No. SK. 4945/MENLHK-PKTL/IPSDH/PLA.1/8/2020 and Decree of the Minister of LHK No. SK. 666/MENLHK-PTKL/IPSDH/PLA.1/2/2021, the unit of certification submitted the latest peat inventory for 2021 to RSPO GHG including the following:		
<ul style="list-style-type: none"> • Evidence of submission of Peat inventory to RSPO GHG on 26 February 2021 which informs that based on the August 2020 PIPPIB map it is known that PT Bumi Pratama Khatulistiwa was removed from the peat area. This has been responded to by the RSPO on 10 March 2021. • Proof of submission to RSPO GHG dated 28 June 2021 informing that removing the PT. Bumipratama Khatulistiwa Plasma area from the peat inventory based on the Decree of the Minister of Environment and Forestry dated 15 February 2021 and has been responded to by the RSPO on 30 June 2021 		
With the issuance of the letter, the PIPPIB map for August 2020 is known to PT. Bumipratama Khatulistiwa was removed from the peat area, this was handed over to the RSPO GHG Unit on 26 February 2021. Based on the semi-detailed soil survey map report in September 2014, it was informed that the slope of the land in the company's operational area is in the flat category (0-2° or 0-4%). Thus, the company does not have a sloping area management strategy.		
7.5.3		
Based on information from document review and management unit interviews that PT. Bumi pratama Khatulistiwa Estate that New oil palm plantings in 2021-2022 will not be carried out on land with steep slopes in accordance with applicable regulations. Base on interview and document verification of areal statement on 2020 is known the planting year of 1996 and above is replanting, no planting above 15 November 2018		
	Status: Comply	
7.6		
Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.		
7.6.1, 7.6.2 and 7.6.3		
PT Bumi Pratama Khatulistiwa has analyzed the structure of the peatlands based on semi-detailed land survey documents. Soil type maps are found in semi-detailed soil survey documents. The map scale used is 1:50,000.		
Based on a semi-detailed land survey map report in September 2014, it was informed that the slope of the land in the company's operational area is in the flat category (0-2° or 0-4%). From these results, the company does not have a sloping land management strategy. The development of the operating area refers to the semi-detailed land survey documents and land suitability documents in 2014.		
Based on information from interviews and verification of area statement documents in 2021-2022, it is known that the planting year 1996 and above is replanting, there is no planting after November 15, 2018.		
	Status: Comply	
7.7		

No new planting on peat, regardless of depth after November 15th, 2018 and all peatlands are managed responsibly.
7.7.1

Based on the information from interviews and verification of the management unit documents that the area statement in 2021-2022 it is known that the planting year 1996 and above is replanting, and PT. Bumipratama Khatulistiwa in 2020-2022 does not carry out any replanting activities above November 15, 2018

7.7.2

The unit of certification shows the peat inventory reporting data for PT Bumipratama Khatulistiwa Estate to the RSPO on 19 May 2020 including the Shapefile and a statement of PT Bumipratama Khatulistiwa Estate 's area. The peat inventory report refers to the RSPO Peat Inventory guide template. Based on the peat inventory report, the area of peat in the core area is 4,437.93 ha while for the plasma area it is 2075.44 ha.

In 2020-2021 there is a decree from the Ministry of Environment and Forestry to PT. Bumipratama Khatulistiwa, among others:

- **SK Pippib as of August 2020**

Decree of the Minister of Environment and Forestry No. SK. 4945/MENLHK-PKTL/IPSDH/PLA.1/8/2020 concerning Stipulation of Indicative Map for Termination of New Permits for Primary Natural Forests and Peatlands in 2020 Period II (PIPIB)

- **SK Pippib as of February 2021**

Decree of the Minister of LHK No. SK. 666/MENLHK-PTKL/IPSDH/PLA.1/2/2021 concerning Stipulation of Indicative Map for Termination of Business Licensing, Approval for Use of Forest Areas, or Approval of Changes in Designation of New Forest Areas in Primary Natural Forests and Peatlands in 2021 Period I.

From the Decree of the Ministry of Environment and Forestry Decree of the Minister of Environment and Forestry No. SK. 4945/MENLHK-PKTL/IPSDH/PLA.1/8/2020 and Decree of the Minister of LHK No. SK. 666/MENLHK-PTKL/IPSDH/PLA.1/2/2021, the unit of certification submitted the latest peat inventory for 2021 to RSPO GHG including the following:

- Evidence of submission of Peat inventory to RSPO GHG on 26 February 2021 which informs that based on the August 2020 PIPPIB map it is known that PT Bumi Pratama Khatulistiwa was removed from the peat area. This has been responded to by the RSPO on 10 March 2021.
- Proof of submission to RSPO GHG dated 28 June 2021 informing that removing the PT. Bumipratama Khatulistiwa Plasma area from the peat inventory based on the Decree of the Minister of Environment and Forestry dated 15 February 2021 and has been responded to by the RSPO on 30 June 2021

Based on the latest peat inventory report that has been submitted to GHG RSPO, it is known that there are no peat areas in PT Bumipratama Khatulistiwa Estate.

7.7.3

PT Bumipratama Khatulistiwa carries out water management activities, which refer to procedure no. SA 02/WIP-KB/0/2010 revised March 1, 2020 regarding the management of peat areas to reduce the rate of subsidence of peat soils. The procedure states that the company must manage and monitor the peat water level, by recording and monitoring the water level, the groundwater level read through the piezometer and subsidence pile reduction. Measurement of water level and ground water level is carried out every day, while land subsidence is carried out once a year.

The procedure is explained, the company keeps a record of the water level every day, if the water level is <70 cm from the ground water level in the dry season, and the height is 50 cm in normal weather conditions. Based on information from interviews and review of documents to answer OFI in ASA-3 that the company has completed the program of making 16 units of peat subsidence in an oil palm plantation area of 4,437.93 by the end of 2021 with a guideline of 1 unit of subsidence representing 240 ha and monitoring records regularly (every 3 months) until May 2022.

Based on the explanation above, the subsidence is installed at 1 pole per 240 ha when compared to the oil palm planting area of 4,437.93 hectares according to the planting statement area document. The company has installed 19 peat reduction units, in this case the company shows an additional program to make peat reduction units carried out in February and May 2022 Based on the field visit to the subsidence pole, it is known that the company has taken measurements using the subsidence pole. The stakes have been demarcated by using a fence and not maintained with the aim that the peat soil is reduced naturally/undisturbed. At the time of the visit, the land subsidence from the initial installation limit in Block 127E was about 11.5 cm (installation was carried out on December 12, 2016).

Based on the document review, it can be concluded that the company's procedures have adopted the RSPO manual on BMP for oil palm cultivation on peat in 2013. In addition, Indonesian regulations related to peat management such as the Indonesian Government law number 57 of 2016 related to the management and protection of peat ecosystems.

7.7.4

The company shows the following documents related to regulating groundwater levels to inhibit carbon emissions from peatlands as follows:

- **Monitoring of drainage water level (Stake weirs).**

- Types of water management activities carried out by the company include: Manufacture and installation of Wier Drainage Pegs. Wier is monitored by 96 units of stake weir by appointed officers in each division/Estate on a regular basis every day. The water level is maintained between 15 - 25 cm below ground level. Examples of the last monitoring on May 25, 2022 include

No	Block	No. drainase patok Weirs	Result on 25 May 2022 (cm)
1	101 A	1	30
2	101E	10	25
3	210D	20	20
4	212E	30	25
5	119E	40	20
5	127C	50	25
6	129A	60	20
7	139A	70	20
8	143C	80	25

- Mechanical trench maintenance and washing. Performed regularly once a year using heavy equipment (excavators).

- **Subsidence monitoring**

- The procedure is explained, the company keeps a record of the water level every day, if the water level is <70 cm from the ground water level in the dry season, and the height is 50 cm in normal weather conditions. Meanwhile, 1 pole per 240 ha is installed for subsidence and must be monitored regularly (every 3 months).
- The company has recorded peat subsidence in the Peat Subsidence Data document, based on the document it is known that the company installed 19 units of peat subsidence.
- Based on the explanation above, the subsidence is installed at 1 pole per 240 ha when compared to the planted area of 4,437.93 hectares of oil palm according to the planting statement area document. The company has installed 19 peat reduction units, in this case the company shows an additional program to make peat reduction units carried out in February and May 2022
- The company has recorded peat subsidence in the Peat Subsidence Data document for the period 2022 (monitoring pole subsidence in February and May 2022)

No	Block	Date of manufacture	Total Drop 2021 (Cm)	February 2022 (Cm)	May 2022 (cm)
1	210E	22-12-2016	15.6	0.3	0.1
2	114A	05-01-2017	13.6	0	0
3	121E	05-11-2016	19.1	0.4	0.5
4	124E	28-12-2016	-	0	0.5
5	127E	08-10-2016	13.6	0	0
6	101E	02-11-2020	3.5	0.5	0
7	129E	04-11-2020	3	0.4	0.5
8	142A	02-11-2020	3.6	0.1	0.6
9	147D	08-02-2021	4.7	0.5	0.3
10	138E	08-02-2021	8.5	0	0.8
11	131E	09-02-2021	1.6	0	0
12	133D	09-02-2021	1.7	0.6	0
13	146A	09-02-2021	4.2	0	0.7
14	144A	09-02-2021	9.2	0.3	0

15	119E	20-02-2021	1.7	0	0.5
16	115E	20-02-2021	3.1	0.1	0
17	104E	06-05-2021	2.1	0.5	0.3
18	102E	06-05-2021	3.2	1.8	0.4
19	118C	16-09-2021	0	0	1.5

Based on field visits on subsidence pole it is known that the company has taken measurements using subsidence stakes. Stakes have been restricted by using fences and are not treated with the aim of decreasing peat soils naturally occurring / no disturbance. At the time of the visit, land subsidence from the initial installation limit in Block 127E Divisi 2 Phase 3 was around 11.5 cm (installation was carried out in 12 December 2016).

Based on the latest peat inventory report that has been submitted to GHG RSPO on 28 June 2021 and has been responded to by the RSPO on 30 June 2021, it is known that there are no peat areas in PT Bumi Pratama Khatulistiwa.

7.7.5

PT. Bumipratama Khatulistiwa has Drainability assessments are carried out on plantations planted on peatland following the RSPO Drainability Assessment Procedure on October 2019. The drainability assessment method accordance drainability assessment procedure version March 2019, the scope assessment on peat area 4655.59 ha. The source data for Drainability Assessment consist of:

- Semi detailed soil maps (Param Agriculture Soil Survey 2014) included peat thickness.
- DEMNAS, citra landsat stereoplotting (i.e average elevation).
- GPS on site monitoring 2019 (water level elevation)
- Subsidence rate monitoring (subsidence rate)
- Topography survey 2009 (centroid point, drainage zone, nearest water body).

The conclusion of summary drainability limit assessment report is the depth to drainage base is more than peat thickness of the peat – the drainage base is in the mineral soil below the peat – the drainability limit time does not need to be calculated. The drainability assessment report also submitted to RSPO coincide with peat inventory reporting data 19 May 2020.

The unit of certification shows the peat inventory reporting data for PT. Bumipratama Khatulistiwa to the RSPO on 19 May 2020 including the Shapefile and a statement of PT Bumipratama Khatulistiwa area. The peat inventory report refers to the RSPO Peat Inventory guide template. Based on the peat inventory report, the area of peat in the core area is 4,437.93 ha while for the plasma area it is 2075.44 ha.

In 2020-2021 there is a decree from the Ministry of Environment and Forestry to PT. Bumipratama Khatulistiwa among others:

- **SK Pippib as of August 2020**
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- **SK Pippib as of February 2021**
Decree of the Minister of LHK No. SK. 666/MENLHK-PTKL/IPSDH/PLA.1/2/2021 concerning Stipulation of Indicative Map for Termination of Business Licensing, Approval for Use of Forest Areas, or Approval of Changes in Designation of New Forest Areas in Primary Natural Forests and Peatlands in 2021 Period I.

From the Decree of the Ministry of Environment and Forestry Decree of the Minister of Environment and Forestry No. SK. 4945/MENLHK-PKTL/IPSDH/PLA.1/8/2020 and Decree of the Minister of LHK No. SK. 666/MENLHK-PTKL/IPSDH/PLA.1/2/2021, the unit of certification submitted the latest peat inventory for 2021 to RSPO GHG including the following:

- Evidence of submission of Peat inventory to RSPO GHG on 26 February 2021 which informs that based on the August 2020 PIPPIB map it is known that PT Bumi Pratama Khatulistiwa was removed from the peat area. This has been responded to by the RSPO on 10 March 2021.
- Proof of submission to RSPO GHG dated 28 June 2021 informing that removing the PT. Bumipratama Khatulistiwa Plasma area from the peat inventory based on the Decree of the Minister of Environment and Forestry dated 15 February 2021 and has been responded to by the RSPO on 30 June 2021

Based on the latest peat inventory report that has been submitted to GHG RSPO on 28 June 2021 and has been responded to by the RSPO on 30 June 2021, it is known that there are no peat areas in PT Bumi Pratama Khatulistiwa.

7.7.6

Based on information on the results of a document review in the PT Bumipratama Khatulistiwa Estate area, the following is the management of the planting area that has been carried out by the company, for example.

- Fertilizer recommendations for oil palm plantations on peatlands
 - The fertilization program for immature plants (TBM 1-TBM 3) must follow the standard fertilization program for peat soils in the West Kalimantan Region.
 - Fertilization program for mature crops (4th year/ TM 1) based on recommendations from agronomists after leaf sampling and leaf analysis results are available
- Important procedures and requirements for management on peat soils:
 - The groundwater level in peatlands is maintained not less than 0.4 (zero point four) meters below the peat land surface.
 - To control the water level, a sluice gate or stop off with the appropriate size must be made in the main drain and collection ditch.
 - The water level marker must be placed in a suitable place on the collection drain or Main Drain
- Monitoring water level in Main drain & collection Drain
 - The meter/marker (pin) is placed at the "stop off" drainage with marking lines/scales every 5cm.
 - Scales on wooden stakes must be placed in the trench in an upright position. " Zero (0) is at the top, parallel to the ground/land level.
 - A staff must make monitoring once a week and is responsible for recording the water level to be reported to the Field Officer and Estate Manager.
 - In order to more efficiently manage and control the water level, a detailed topographic survey in the peat area should be made and mapped to determine the appropriate drainage design
- Monitoring of peat subsidence:
 - For monitoring peat subsidence, subsidence stakes are needed.
 - How to make subsidence stakes: the material for subsidence stakes must use iron stakes / use pralon with a diameter of 2.5 inches / larger with the size of the lower end until it penetrates into the mineral soil layer and the top end is at least 50 cm above the surface of the peatland, attach a steel meter to the top. a pipe/pralon used as a subsidence stake with a "0" position right on the surface of the peatland, mark the initial boundary for the position of the top surface of the peatland with a scratch/marker that does not disappear, a fence is made to/protect the area.
 - The location of the installation point of at least 1 subsidence stake per 240 Ha must be monitored regularly
 - Monitoring and reading of peat subsidence calculations must be made quarterly

Based on a review of documents from the management unit that all existing plantings on peatland are managed in accordance with applicable laws and/or "RSPO Guidelines for Best Management Practices (PPT) for Oil Palm Cultivation that already exists on Peatland", version 3 (June 2019) and related audit guidelines (May 2019)

7.7.7

Based on field observations, document review of PT. Bumipratama Khatulistiwa and the peat inventory report to the RSPO for 2020-2021, it is known from the entire factory and plantation area of PT Bumipratama Khatulistiwa that the planting area was found to be in peat areas. On land consisting of canals, roads, buildings, factories, waterways, and enclave areas, the company does not carry out oil palm plantation activities. Peatland reserve areas and for unplanted peatlands are HCV areas

	Status: Comply	
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7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

Based on the AMDAL 2004 document for PT BPK, document identification of HCV 2015, as well as maps of river flows and water sources it can be seen that there are several water sources points in the operational area of PT BPK there is a main river, namely the Landak River, as well as tributaries that near the POM area. Based on the document, it is also known that the management plan for water sources is to test the quality of surface water every 3 months. All tests are carried out by a KAN accredited laboratory (LP-001-IDN) for POM scope and Indonesian Research and Standardization Agency for Estate Scope. Regarding this, the company shows the results of surface water quality testing for all identified water sources contained in all RKL and RPL reports for the semester 2 of 2021. The company conducted a surface water test which was carried out in 8 sample locations for Estate Scope and 2 sample location for POM scope using quality standards based on Regulation Government Number 22 of 2021, class 2. The results of quarterly tests show that there are pH,

COD and BOD values which are all above the quality standard for Estate scope. The management explained that the cause of the high pH, BOD and COD values had occurred since the initial baseline when the 2004 AMDAL study was conducted. This is due to the characteristics of the river which is a peat swamp forest area, as well as permanently inundated areas. In addition, the parameter using class 2 is not specifically requested in the AMDAL document or the West Kalimantan regional government regulation.

The unit of certification also does not limit access to clean water, and workers also have adequate access to clean water. Based on the results of interviews with management, information was obtained that clean water facilities for housing were obtained from drilled wells provided by the company and for factory workers who lived in factory housing, the water source came from reservoirs which has been processed in Reverse Osmosis (RO). The company treats peat water and rainwater using a Reverse Osmosis (RO) installation so that it is suitable for consumption. They also consistently had a water management plan for mills and plantations that is stated in the Environmental Management and Monitoring document as well as riverbank management programs and other water sources. Testing for drinking water is also carried out by the company to see the quality and quantity of ground water taken from monitoring wells in RO Area every year. The guidelines used in measuring and testing drinking water quality use the Minister of Health Regulation Number 32 of 2017, concerning Environmental Health Quality Standards and Water Health Requirements and it appears that all parameters are below the standard quality standards.

The realization of water quality improvements that have been carried out by the company include:

- Conduct socialization to all employees and the surrounding community not to use the water for consumption activities.
- Maintain a hygienic environment around water sources so that sources of pollutants can be minimized.
- Report the results of the examination in accordance with the provisions of the applicable laws.
- Testing the quality of river water and boreholes listed in the RKL/RPL report every semester
- Management of surface water erosion and runoff, water management in low-lying areas and monitoring of surface water quality as stated in the implementation of the semester RKL-RPL
- Management of riparian and water sources in the form of reservoirs.
- POME management using WWTP
- Monitoring the use of water for palm oil processing and evaluating its use.
- Planting local plants such as Banyan, Lebar, Guava, Balik Angin, Coconut, Matoa, Ketapang and Jackfruit.

The company has tested the surface water quality as described in the RKL-RPL document for semesters I & II of 2021, for Mill it is carried out upstream & downstream of the Landak river while in Estate on the upstream & downstream Malaya river, upstream & downstream Parit tenaga Baru river, Parit Gotong Royong River, Parit Kongsu River and Ampaning River upstream & downstream. The results of the analysis of test data for the last 5 years also show that several parameters are above the quality standard and experience fluctuations in several parameters of BOD, COD and PH. The results of interviews with the company and a review of the RKL-RPL document for Semester 2 of 2021, information was obtained that the increase in some of these parameters was due to the decomposition of organic matter in peatlands and the large number of activities in surrounding villages that used water around them using bath wash toilet, while the low PH value caused oxygen dissolved in water is reduced. Currently the evaluation model carried out by the company is to compare the results of the analysis of the current period with the previous period.

Based on this document, the company has evaluated data from monitoring results from time to time (time series data) for aspects of the impact of decreasing water quality, namely for semesters I & II of 2021 to assess trends in environmental quality changes caused by an operational activity.

Based on this, the company has an improvement opportunity to conduct an analysis related to surface water test results that are not in accordance with quality standards in a comprehensive manner covering all parameters over some period of time (2 or 3 years), management of potential pollution that may occur, as well as mitigation actions. **OFI**

7.8.2

The unit certification conducted practices maintain the quality and availability of surface and groundwater, explained on HCV management plan to maintain the HCV areas in the operation area of PT BPK, listed on Management plan HCV 2020 and 2021 documents. HCV management activities that are taken by the management unit are maintained HCV attributes (HCV boundary, signboard), HCV socialization (community and worker), maintain HCV area, regular patrols for maintaining HCV security and water source.

The company also has a policy related to the prohibition of the use of paraquat pesticides as stated in the zero deforestation, zero peat and zero exploitation policy dated November 2019, the policy as one of the efforts to protect water resources.

Based on the results of the verification of the pesticide use document for the period 2021 to 2022, the company no longer uses paraquat, the use of fertilizers and pesticides is in accordance with the recommendations from research, there is no excessive use of pesticides.

Base on field visit during audit, for examples on Malaya river block 101a and 101b, acquired information that company shown proper ways for maintain and protect the catchment area for example manual weeding and marking the chemical boundary border.

Based on the results of interviews with external stakeholders in the control and environmental pollution division, information was obtained that in the past 1 year there have been no complaints from stakeholders regarding river water pollution that were submitted to the Office.

Base on interview with sprayer workers there are understood related procedures of the maintaining and protect the catchment area for example manual weeding and marking the chemical boundary border.

7.8.3

The company manages POME in the WWTP pond and then uses it on the land application. Before being used on land application, the quality of the POME is tested until it reaches a threshold that is in accordance with government stipulations. The POME quality testing document review shown for January 2021 to April 2022 all of POME testing parameters are compliant to the standards quality (reference to the KepmenLH regulation KepmenLH Number 5, 2014 Appendix III). For example POME test results Outlet date 6 April 2022 by accredited laboratory by govement:

Parameter	Unit	Threshold	Result
BOD	Mg/l	100	25.8
COD	Mg/l	350	60.4
pH	-	-	8.37
Oil and grease	Mg/l	25	14.4
TSS	Mg/l	250	98
Nitrogen (N)	Mg/l	50	7.64

**Quality standards are based on KepmenLH Number 5, 2014 Appendix III*

The company also has a parameter measuring device for liquid waste released into water bodies, the tool can measure flow rate, BOD, COD and PH. These measuring tools measure digitally and are integrated online and can be monitored by the head office every day. If there is an incorrect POME parameter value, the report will be sent directly to the head office and immediately stopped and action is taken.

The unit of certification has provided evidence that the information has been management & monitoring of the POME and surface water testing report quarterly. POME management & monitoring and surface water testing report to Environmental Agency Kalimantan Barat Province, Environmental Agency Kubu Raya Regency, Plantation agency and Environmental Ministry dated 23 May 2022.

The unit of certification has POME Disposal Permit to the surface water, issued by Environmental Service of Kubu Raya Agency Number 503/008/DPMPTSP-E/IPLC/2017 dated November 23, 2017 issued by the, with a validity period of up to 5 years.

Based on the results of interviews with external stakeholders in the control and environmental pollution division Kubu Raya regency environmental agency, information was obtained that in the past 1 year there have been no complaints from stakeholders related POME management & Monitoring and surface water testing.

7.8.4

The procedure of water use monitoring in mill available under document Procedure of Water Treatment Plant. Water consumption monitored by using flowmeters installed in the piping system of WTP. Base document verification water consumption record for period January until May 2022 fresh water usage to procces 48,789.8 m3 and mill fresh water per produced tonne 1.05 (M3 / MT FFB), with standart 1.3 M3 / MT FFB.

The company already has a Water Intake Permit Number 516/KPTS/M/2021 dated 28 April 2021 based on the Decree of the Minister of Public Works and Public Housing concerning the Granting of a Water Resources Concession Permit with a quota of 27,000 m³/month and 25 hours/day. The water intake point is located on the Landak River. Based on this information, this closes OFI on indicator 7.8.4 on surveillance-3 audit.

The company has also carried out its obligations as a surface water user, namely paying a levy on the use of surface water every month by showing the Record of Payment of Surface Water Tax Bills. The evidence shown is proof of payment Period February 2022 tax paid on March 21, 2021. Payment is made for the use of water in its entirety.

Status: Comply

7.9

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

The unit certification already maximizing the use of renewable energy (fiber & shell) as boiler fuel. For example, use of shells and fiber period January to December 2021 BPK POM has produces 1,134,196 kWh of electricity from turbine. Renewable energy use per ton of palm product in the mill is 10.08 kwh / ton CPO. Result Direct fossil fuel used is 0.09 kWh/ ton CPO.

Status: Comply

7.10

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

7.10.1

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

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

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

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

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

Summary Emission

Emmision per product	tCO ₂ e/tProduct
CPO	0.43
PK	0.43

Production	t/yr
FFB processed	117,428.60
CPO produced	21672.43
PK produced	4769.79

Extraction	%
OER	18.46

KER	4.06
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Land use	Ha
Planted area	6909.48
Planted on peat	0
Conservation Area Forested	6909.48
Conservation Area Non Forested	11.10

Summary of field emission and Sinks

Description	Own crop			Group			Total
Emissions Sources	tCO2e	tCO2e/ha	tCO2e /tFFB	tCO2e	tCO2e /ha	tCO2e/t FFB	
Land conversion	65138.31	10.01	0.72	7112.16	17.61	2.28	72250.47
CO2 emissions from fertilizer	2542.62	0.39	0.03	200.28	0.50	0.06	2742.90
N2O emissions from Peat	0	0	0	0	0	0	0
N2O emissions from Fertilizer	1753.57	0.27	0.02	141.27	0.35	0.05	1894.94
Fuel consumption	653.46	0.10	0.01	50.02	0.12	0.02	703.47
Peat oxidation	0	0	0	0	0	0	0
Crop sequestration	-59521.14	-9.15	-0.65	-3358.70	-8.32	-1.08	-62879.84
Sequestration in Conservation area	0	0	0	0	0	0	0
Total	10566.92	1.62	0.12	4145.03	10.27	1.33	17041.80

Summary Oil Mill Emissions and Credits

Remarks	tCO2e	tCO2e/t FFB
Emissions sources		
POME	41243.18	0.03
Fuel consumption	432.53	0
Grid electricity	0	0
Credits		
Export of grid electricity	0	0
Sales of PKS	-6052.68	-0.05
Sales of EFB	0	0
Total	-5620.15	-0.05

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

There is a difference in the area of the HCV area in the basic info with the HCV area listed in the GHG calculation, this is because BPK POM gets supply of FFB from BPK plasma estate which has an HCV area of 2.58 ha.

7.10.2

The unit certification did not carry out new developments above 2014, but the company continued to manage GHG by conducting an inventory of emission sources. They can show identification documents of activities that produce emissions for the period 2021 for Mill and Estate. This is made to estimate carbon stocks in the management area along with potential sources of emissions that can occur directly as a result of the management, and plans to minimize these emissions are drawn up and implemented.

The GHG emission reduction mitigation plan developed by the company is the use of renewable fuels in the form of shells, fiber and EFB as a substitute for diesel, performing maintenance on operational equipment such as boilers on a regular basis, and doing reforestation around the factory and residential areas. Records of GHG mitigation for Estate and Mill units, for example the use of fertilizers in accordance with the dosage, routine maintenance of operational vehicles, socialization of the prohibition of burning waste, applying efficient use of electricity and integrated pest control to minimize the use of pesticides.

Boiler burning activity at BPK POM is not significantly negative impact on air quality. PT. BPK is committed to always monitoring/testing periodically with the installation of Smoke Density, and environmental improvements through air pollution reduction programs such as reforestation programs around factories, improving work safety for factory employees by wear protective clothing (masks) and tightly cover office walls and equip it with air conditioning and perform maintenance on machines boiler equipment regularly.

7.10.3

The company has identified pollutions and emissions sources of BPK POM for the period 2021 and 2022, such as CO₂ (boiler, generator, transportation), CH₄ (POME), hazardous waste (WTP, chemical storage), noise (machinery). The sources of pollution and emissions for the estate are listed on the identification documents and management plans for pollution sources for the period 2021, such as emissions (CO₂, CO), noise, chemical waste, organic and inorganic waste, and infectious waste. The emission testing on meet with regulation i.e generator emission accordance witch environment minister's decision number 13 year 2009 appendix 1, boiler emission accordance witch environment minister's decision number 07 year 2007.

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

Status: Comply

7.11

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

7.11.1

Based on information from document reviews and management interviews that the company has a commitment to prohibit burning in all of the company's operational activities, it has been stipulated in the No Deforestation, No Peat, No exploitation policy, published on December 5, 2013. The document confirms that the Wilmar group implements a no-burn policy, which does not allow burning activities during land preparation for new plantings, replanting and or all other activities.

The company has a replanting SOP listed in the agronomic guidance document and the 2015 WILMAR oil palm plantation SOP which explains that replanting is done mechanically and avoids burning. The company does not do land clearing or replanting by burning the land. The results of field observations to the river border area, harvest area and other areas did not find any indication of land burning. The company also has a SOP for Mitigation and management of forest and land fires document number 001/SUS-SOP/II/2019 effective September 9, 2019. The scope of the SOP includes planning, prevention, suppression, post-fire management and reporting and coordination of work for fire suppression. .

Based on field observations, there was no indication of burning in area the PT. Bumipratama Khatulistiwa.

7.11.2

The company has shown a fire prevention and control report for the semester 1 January to June 2022 which has been submitted to the Kubu Raya Regency Forestry and Plantation Service with proof of receipt of the PT Bumi Pratama Khatulistiwa forest and land fire prevention and control report to the Kubu Raya Regency Plantation Office on dated June 21, 2022. The report contains data on

preparedness, systems, facilities and infrastructure for controlling forest and land fires, structure of officers and data on facilities and infrastructure of PT. Bumipratama Khatulistiwa.

The company has demonstrated the facilities and infrastructure owned, among others, for example:

Based on the results of public consultations with the Kubu Raya Regency Plantation Office, that there has never been a forest and land fire in the company area during 2021-2022.

Tools and equipment	Amount	Unit
Blackout helmet	12	Pcs
Helmet safety	15	Pcs
Head lamp	30	Pcs
Glasses	25	Pcs
Mask	250	Pcs
Breathing apparatus	22	pcs
Gloves	12	pcs
Seat belt standard	9	pcs
Blackout Shoes	15	pairs
Blackout suit	12	pcs
2 eye ax	8	pcs
Sharp rake	12	pcs
Hoe	12	pcs
Shovel	6	pcs
Backpack sprayer	10	pcs
First aid medicine	1	boxes
Portable pump machine	24	unit
Spiral hose	24	unit
1.5x20 m canvas hose	44	roll
Nozzles	24	pcs
GPS	1	unit
Car	2	unit
Equipment carrier	3	unit
Patrol facilities	2	unit
Water Reservoir (20x20x5 meters)	2	Unit
Bore hole	4	unit

7.11.3

In an effort to prevent and anticipate fires in surrounding villages, the company always lends fire fighting equipment to villages around plantations and factories during the dry season. This is evidenced, among others, by making a Minutes of the borrowing of extinguishing equipment for Sungai Enau Village in the form of equipment: 1 pump machine unit, 4 rolls of canvas hose, 1 nozzle and 1 spiral hose unit.

The socialization that has been carried out in 2022 include:

- Socialization of forest and land fire prevention with plasma harvesters of Tuah Jubata KUD on 03 May 2022 with material from PT. Bumipratama Khatulistiwa Estate management leaders (FO and FC)
- Socialization of forest and land fire prevention with PT. Bumipratama Khatulistiwa plantation workers on March 11, 2022 in the Division

1 office yard with the EHS Team and security guards.

- Training on fire emergency response simulation and fire blanket simulation (Emergency drill) with all workers on 22 February 2022.

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 and 7.12.8

The company did not clear land beyond 2018 without prior HCV and HCS assessments. The company has also conducted a LUC Analysis in collaboration with AKSENTA in August 2015 for an area of 4814.96 Ha with the results of the assessment in the form of an area of Raw Liability covering an area of 23.02 Ha and a total area of Final Conservation Liability (FCL) covering an area of 0 Ha. The results of the LUCA assessment were submitted on 12 October 2015 with a communication process that lasted until the final decision issued by the RSPO (rspocompensation@rspo.org) on 7 September 2016 which explained that The LUCA is marked as PASS. On 29 September 2016 the LUCA has been declared to have been endorsed by the RSPO and explained in an email (rspocompensation@rspo.org) that the final liability for PT BPK is 0 Ha, no compensation plan is needed.

This is because land cover changes were analyzed using spatial data (Landsat imaginary with 30m spectral resolution) in Oct 2005, Sept 2007, Jan 2010, August 2014, August 2015 in the summary report of LUCA explained, among others:

- Land use change occurrence 2005-2015 There are no significant change of land cover since 2005-2016, land cover change is occurred at period 2005-2007 which is 23.02 Ha of shrubs has converted to palm oil, land cover inside the permitted area is dominated by palm oil mill since 2005 (96.4%)
- Findings there are no significant finding for LUC Analysis of PT BPK, the land cover is reclassified into vegetation coefficients as coefficient 0 (according to the RaCP document).

On March 13, 2017, Aksenta reviewed the LUCA document with the results of a review in the form of recommendations for remediation of riparian areas with an area of 6.8 Ha and peat areas covering an area of 4,750.6 Ha with no social remediation and the FCL status remains 0 Ha. This is because even though land clearing was carried out before 2005 so that the FCL was 0 Ha, the company was recommended to continue to manage peat and river border areas as recommended in the Remediation and Compensation Procedure Version 1 (May 2014 Page 9) which stated that it would be better for the company to apply BMP Peat in the remediation area.

The company explained that the remediation activity had actually been carried out since 2010 with evidence of implementing BMP Peat Guidance activities such as building 96 units of weirs, 35 stations for monitoring water level, and 19 stations for monitoring peat subsidence. On November 30, 2021, the company sent a proposal for remediation of peat and riparian lands to the RSPO and the RSPO has also responded by stating that it will follow up on the proposal given by the company.

During the recertification audit, the company showed the progress of the remediation plan, remediation plan for RaCP 2016 & RaCP 2018 submission which was emailed to RSPO on 30 November 2021, the company also showed an email on 27 April 2022 explaining PT BPK's remediation plan is complete and the plan has been forwarded to the compensation Panel for review. There is also evidence of communication between the certification unit and the RSPO regarding the status of the remediation plan dated 7 June 2022, which explains that the stages are still under review by the RSPO.

7.12.2

The certification unit did not clear new land after November 15 2018, the last new land clearing was carried out in 2005 to 2007 covering an area of 23.02 Ha with the type of land cover in the form of shrubs. The certification unit has identified the HCV's contained in the High Conservation Value Assessment Report at PT. Bumi Pratama Khatulistiwa, Kubu Raya Regency, West Kalimantan Province. Identification is carried out in collaboration with PT. Remark Asia which took place in March – July 2015. The team for preparing the HCV assessment was led by Yokyok Hadiprakarsa who a member of the Assessor Licensing Scheme is or (RSPO Approved Assessor). The scope of the study is 7003.07 Ha consisting of estate and mill covering an area of 4854.52 Ha and plasma covering an area of 2148.55 Ha. Field data collection activities were carried out on April 14-18 2015 with the scope of social data collection covering Sungai Malaya Village, Sungai Enau Village, Kubu Padi Village, and Mega Timur Village. The peer review of the report was conducted by Machmud Thohari on February 13, 2016.

The certification unit carried out a public consultation on 17 April 2015 which was attended by 29 participants from surrounding villages such as Kubu Padi Village, Malay Timur Village, traditional leaders, Sungai Enau Village, with a total number of 29 participants. The results of the HCV identification carried out in 2015, namely the HCV area of 13.86 Ha with the following details:

Location of HCV area	Type of HCV	Scope (Ha)	Location	Description
Padagi	6	0.01	Estate	-
Hutan sekunder 1	1, 3, 4	1.87	Estate	Community controlled
Hutan sekunder 2	1, 3, 4	1.5	Estate	Community controlled
Parit gotong royong	1, 4, 5	0.17	Estate	Community controlled
Anak sungai malaya	1, 4	4.23	Estate	-
Parit kongsi	1, 4, 5	0.22	Estate	Community controlled
Parit ampeming	1, 4, 5	0.53	Estate	Community controlled
Sungai landak	1, 4	2.74	POM	Outside of the latest HGB
Sungai tempayan	1, 4	0.02	POM	Outside of the latest HGB
Anak sungai malaya 2	1, 4	2.57	Plasma	Outside the scope of audit
Total (Ha)		13.86		

There is a difference between the total HCV area data with the Basic info and Matrix Template, this is because the data included in the document is an HCV area located in the Estate, while the HCV area for plasma is outside the scope, and the HCV area in mill is included in built area (pier) which is in the mill statement area.

The total area of 8.53 hectares of HCV located in the BPK estate, an overlapping HCV area with an occupation area of 4.28 hectares was identified, namely in blocks 244, 048 and 049. There are news of agreements dated on September 13, 2019 and July 19, 2019 between PT BPK and the cultivators land in block 049, block 048 and block 244 which states that the cultivating community/ occupant does not agree to manage HCV in the area. Based on this explanation, the HCV area which is included in the 4.28 Ha occupation area is not managed by the unit certification.

7.12.3

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

7.12.4

The unit certification conducted practices maintain the quality and availability of surface and groundwater, explained on HCV management plan to maintain the HCV areas in the operation area of PT BPK, listed on Management plan HCV 2020 and 2021 documents. HCV management activities that are taken by the management unit are maintained HCV attributes (HCV boundary, signboard), HCV socialization (community and worker), maintain HCV area, regular patrols for maintaining HCV security and water source.

The company also has a policy related to the prohibition of the use of paraquat pesticides as stated in the zero deforestation, zero peat and zero exploitation policy dated 5 December 2013, the policy as one of the efforts to protect water resources.

Based on the results of HCV identification, it is known that there is an HCV area within the company's Manage area of 13,86 Ha (BPK estate & plasma) consist of 8.53 hectares (BPK estate, included HCV area on 4.28 Ha occupation area). There is several types of RTE species consisting of mammals, aves and reptiles. The company has compiled and determined the HCV management plan in the 2021 2025 HCV Management Program Matrix document with the scope of Management for all Unit. The integrated management plan was developed in consultation with relevant stakeholders and covers the areas that are directly managed and takes into account the relevant wider landscape level carried out in conjunction with the Realization and Review of PT BPK's HCV Management Plant Document. The HCV still maintained and cared by company with providing boundary stack, signboards and provide a border marking the boundaries of the HCV area. For the HCV area in the occupation area, the company conducted a socialization activity on 19 May 2022 related to HCV management and monitoring.

A management and monitoring plan for 2022 is implemented for each type of HCV with the following programs:

- Signboard installation, painting and maintenance
- Water quality testing.
- Installation, addition and maintenance of riparian boundary markers
- Maintenance of traditional buildings (Padagi)
- Rehabilitation riparian tree planting and care
- Outreach and socialization to employees and the surrounding community.
- The enrichment riparian area with ulin, pelaik, jambu jamaika, ketapang, tanjung and gelam

The company has conducted a review related to management and monitoring activities in 2021 which is contained in the report on the implementation of management and monitoring of high conservation value herds in 2020 which contains evaluation and recommendations for management and monitoring as an improvement effort. The company also has PT BPK's 2021-2025 HCV Management and Monitoring Plan document which is based on the results of a review conducted by all relevant parties every 5 years such as Management review conducted on January 19, 2021. In that management plan, they discuss the management of HCV for each type of HCV.

Based on field visit during audit, for examples on Malaya river block 101a and 110b, acquired information that company shown proper ways for maintain and protect the catchment area for example manual weeding and marking the chemical boundary border.

7.12.5

From previous activities, it is known that the certification unit has acquired land for community land which is a plantation area including customary land.

Based on the results of HCV identification, there is HCV 6 in the PT BPK area in the form of the Padagi site which is used as a place of prayer. The certification unit shows the Padagi HCV 6 Agreement between the certification unit and Adrianus Adam Tekod's Chief of Customs to acknowledge that Padagi is blocked 22. The agreement was made on July 4 2018. The certification unit also shows the HCV Management Statement Letter No. 026 / BPK / IX / 2016 which are committed to protecting the areas that have been designated as HCV. The letter was stipulated on September 5, 2016.

Regarding the management of the HCV area in the community's occupational area (*garapan*), the certification unit shows the following documents:

- Attendance list of meeting to discuss HCV management with landowner communities on 18 July 2019 which was attended by 7 representatives of land tenure communities from Parit Salam, Parit Ampaning and Parit Kongsi villages.
- Minutes of agreement on HCV area management with the Community dated 18 July 2019 which contain several points of agreement such as:
 - Willing to manage and maintain riparian river by not applying pesticides at a distance of 5 meters from the edge of the ditch.
 - Willing not to clear land by burning
 - The certification unit is allowed to monitor HCV areas in areas that are cultivated by the community.
 - Communities are not yet willing not to clear forested areas, for reasons of livelihoods.
 - Minutes of agreement on HCV management in areas cultivated by the community made by PT Bumi Pratama Khatulistiwa, dated July 20, 2019 made by HCV Staff, acknowledged by Bina Mitra and approved by the Estate Manager of PT BPK.

The certification unit shows evidence of improvement in the form of a 2019-2024 HCV management and monitoring plan (*garapan area*). In the management & monitoring plan, it is explained that the HCV block 048 & 049 area in the form of secondary forest is socialized once a year, animal patrol & signboard maintenance is done every 6 months and the installation of warning boards is carried out in December 2019. For HCV block 244, 048, 049 in the form of a natural river that has turned into a ditch, socialization is carried out every 1 year, monitoring of water quality & monitoring of the boundaries of the spray area is carried out every 6 months. As for the evaluation of the effectiveness of the protection of the HCV function in the Garapan area, it will be carried out every 2 years.

Based on the results of field visits in blocks 048 and 049 HCV on occupation area, the areas claimed by the community, the certification unit has carried out management by installing HCV-related signboards in these locations.

7.12.6

The Certification Unit already has an SOP for Protection of Protected Animals and Plants Number SOP 15 / WIP- KB/ (01) /2015 dated January 2015. The document contains procedures consisting of preventive and repressive measures in the effort to protect protected wild animals and plants such as sustainability principle, all employees are advised not to hunt, capture, kill and sell endangered protected animals and plants and report any such activities. Maintain and not disturb the area designated as HCV area and report any illegal acts. Employees who do not comply will be subject to sanctions in accordance with applicable laws and regulations. The company also installs no hunting signboards with photos of species and sanctions for violating government regulations in all HCV areas.

The company has conducted a HCV assessment in 2015 which was used as a biodiversity database at PT BPK. Based on the results of the study, data obtained were 7 types of mammals, 5 species of reptiles, 32 species of birds, 4 species of freshwater fish and 49 species of plants. The company also shows the results of HCV monitoring carried out in 2021 that can be contained in the PT BPK, based on

data from routine monitoring using animal encounters in the field as well as information on the existence of protected and endangered species showing that several types of animals can still be found in the PT BPK area. The monitoring results showed several types of animals were found, such as 1 species of mammals which are protected, and 6 species of Aves which are protected. From the data from wildlife encounters with photographic evidence, it can be seen that the HCV area belonging to PT BPK not has animals which are a key species such an Orangutan (*Pongo pygmaeus*). Besides that, there are also protected animals that are found that are included in the protection status according to the Minister of Environment and Forestry Regulation Number 106 of 2018. Based on company monitoring data, there are also species that are included in the IUCN list, such as *Psittacula longicauda*, *Aegithina viridissima*, *Cyarnis turcosus*, *Sus barbatus*, *Cyclomys dentata*, and *Amyda cartilaginea* which are included in the VU and NT categories.

The company has also carried out socialization of the existence of endangered plants and animals to all employees and the surrounding community, which is shown in the Minutes of socialization document, for example the Minutes of socialization to 10 employees on December 6, 2021 at Block 210C, and to residents around PT BPK which were carried out from September and October 2021 with a total of 27 participants. All activities can prove with photos and the attendance list that attached to the document. Indirect socialization is also carried out by installing information boards and brochures warning signs related to conservation areas and the existence of endangered plants and animals that are protected in easily visible places, such as Estate entrances, Estate roads that are often crossed by the community, and other strategic places like office, and other public facilities.

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

For example RTE patrols summary results on 2022 for conservation area on Malaya riparian such as elang bido, bubut, cekakak belukar, cabak maling and cerek kerenyut.

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

7.12.7

The HCV management activities that taken by the management unit for period 2021 are maintain HCV attributes (HCV boundry, sign board), HCV socialization (community and worker), maintain HCV area, regular patrols for maintain HCV security, species monitoring, enrichment in riparian. The company has also submitted a report related to the biodiversity database and monitoring & management HCV of PT BPK to the Natural Resources Conservation Center of Kalimantan Barat.

The company conducted a management review related to the management of the HCV area on 19 January 2021. The company has evaluated the results of management of river boundaries and HCV areas in 2021, among others, as input in the preparation of a management plan for the management and monitoring of HCV in 2022.

Status: Comply

3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or √
	BPK POM 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 √
	BPK POM 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 √
	BPK POM 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 √
	BPK POM 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 Wilmar International Ltd against the rules for partial certification was determined through Self-Assessment in accordance with RSPO Certification System clause 4.2.4. A summary of findings is as stated below.

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

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

MUTU Auditor has verified company partial certification and concludes that:

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

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?	Wilmar Engaged Control Union to conducted assessment of compliance on the minimum requirements for multiple management units as detailed in section 5.5 of the RSPO Certification System for Principles & Criteria June 2020 for Wilmar International Limited and its subsidiaries as listed in this report below
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)	<p>There is no replacement of primary forest since November 2005. HCV assessments are conducted prior to new planting and all new plantings are in accordance with RSPO New Planting Procedures. Below is the summary of proposed new oil planting for the group:</p> <p>Wilmar International - Benso Oil Palm Plantation (BOPP) has proposed a new planting smallholder oil palm project on a 1,477ha communal farmland located in Trebuom in the Mpohor District of the Western Region of Ghana. The RSPO NPP summary management plan and NPP notification available in RSPO.</p> <p>https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-benso-oil-palm-plantation-bopp</p> <p>Biase Plantation Limited (Calaro extension) has proposed new planting area located in Atan Odot village and Uwet village, Odukpani and Akamkpa Local Government Area, Cross River State, Nigeria. The summary report of Wilmar International Limited - Biase Plantation Limited (Calaro extension) completed in 2016.</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-limited-biase-plantation-limited-calaro-extension</p> <p>Eyop Industries (Oban Estate) pending clarification and clearance from government for NPP assessment.</p> <p>The internal audit documentation for uncertified areas were observed and it is confirmed that there was no replacement of primary forest.</p> <p>The group has Grievance Procedure for the implementation of Wilmar's NO Deforestation, No Peat, No Exploitation (NDPE) Policy updated version 2.0 November 2019 as link</p> <p>https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/grievance/grievance-sop/grievance-procedure_final.pdf?sfvrsn=7670cea2_2</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Wilmar International - Benso Oil Palm Plantation (BOPP) has proposed a new planting smallholder oil palm project on a 1,477ha communal farmland located in Trebuom in the Mpohor District of the Western Region of Ghana. The RSPO NPP summary management plan and NPP notification available in RSPO.</p> <p>https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-benso-oil-palm-plantation-bopp</p> <p>Biase Plantation Limited (Calaro extension) has proposed new planting area located in Atan Odot village and Uwet village, Odukpani and Akamkpa Local Government Area, Cross River State, Nigeria. The summary report of Wilmar International Limited - Biase Plantation Limited (Calaro extension) completed in 2016.</p> <p>https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-limited-biase-plantation-limited-calaro-extension</p> <p>Eyop Industries (Oban Estate) pending clarification and clearance from government for NPP assessment.</p>
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p>There is no land conflict in uncertified area also no complain or conflict observed in the RSPO Complaints System.</p> <p>The group has policy for any complaint. Where employees of the Wilmar Group in confidence, raise concerns about possible corporate improprieties. This Policy ensures that</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>arrangements are in place for independent investigations of alleged improprieties and for appropriate follow-up actions as link below; https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/wilmar-whistleblowing-policy.pdf</p> <p>This grievance procedure is open to all stakeholders, though is primarily focused on receiving grievances from external sources. For workers and local communities with specific local level grievances, each of our plantation and mill operational units have site specific complaints and grievances procedures, which have been a requirement of the RSPO Principles and Criteria since 2005. These site-specific procedures are accessible by workers and to any other stakeholder. Grievances raised through the site-specific procedures have a separate resolution process - Consultation and Communication Procedure. The SOP also available in website link as below; https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/grievance/grievance-sop/grievance-procedure_final.pdf?sfvrsn=7670cea2_2</p> <p>The internal audit documentation for uncertified areas were observed and it is confirmed that there were no land conflicts.</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p>The group has Dispute & Resolution Procedure Doc No PPB/RSPO 6.3 (2.2)/(1) revision date 25 Oct 2018 purpose to facilitate a dispute and grievances resolution process between the management, growers and miller and employees, local communities and other affected external parties.</p> <p>The internal audit documentation for uncertified areas were observed and it is confirmed that there were no land conflicts.</p> <p>There are no reports of legal disputes at the time of reporting.</p> <p>The internal audit documentation for uncertified areas were observed and it is confirmed that there were no labour disputes.</p>
2.1.6	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1 (it has changed be Criterion 4.2 in P&C 2018).	<p>The internal audit procedure doc no PBB/PRO 12/(03)/0212 revision 23 March 2020 (Rev 4) conducted periodically for uncertified and certified area and result of internal audit for uncertified areas were observed and it is confirmed that all laws are in compliance.</p> <p>Sample internal audit has been review for: Laba Utama Estate.</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Assessment has been conducted on April 2021. Noted that there is no non-compliance during the assessment as required by uncertified management unit.</p> <p>PT Sarana Titian Permata. The assessment conducted on Jan 2021. Noted that pending on HGU process. Target completion by 2023.</p> <p>PT Agronusa Investama Assessment conducted in February 2021. Pending on the HGU process and target completion by 2022.</p> <p>Trebuom Adum Smallholder Oil Palm Project Assessment conducted in July 2021 with no non-compliance as per uncertified management unit requirements.</p> <p>Calaro Estate. Noted that the assessment has been conducted in May 2021. Noted that there are no identified of noncompliance in the management unit assessed.</p> <p>Sampled internal audit for Suburmas Plantation Sdn Bhd, Jebawang Sdn Bhd, Eyop Industries Limited (EIL) and Biase Plantation Limited (BPL). There has no public comment in website RSPO regarding uncertified area.</p>

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

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

NCR No.	:	2020.01	Issued by	:	Satria Adi Putra
Date Issued	:	13 November 2020	Time Limit	:	Next Surveillance (ASA-4)
NC Grade	:	Non-Critical	Date of Closing	:	10 December 2021
Standard Ref. & Requirement	:	2.1.2 There is a documented system to ensure legal compliance of the certification unit and the third parties it contracts with. This system must also track / monitor changes to the applicable law			
Evidence observed (filled by auditor): Based on the results of document review and interviews, it is known that: <ul style="list-style-type: none">There is a work agreement for transporting FFB, namely CV Sabitah Sukses Jaya with PT Bumi Pratama Khatulistiwa with No. 101 / BPK-EST / SPK / Angkutan-TBS / X-2020. No. 008 / CV.SJJ / Angkutan-TBS / X / 2020 article 10 paragraph 9 states that each head of the contractor registers worker members to participate in occupational health / safety insurance.Presidential Regulation of the Republic of Indonesia Number 82 of 2018 concerning Health Insurance, in Article 13 states that Employers are required to register themselves and their workers as Participants of Health Insurance to <i>BPJS Kesehatan</i> by paying contributions. In the event that an employer has not registered and paid contributions for its workers to <i>BPJS Kesehatan</i>, the employer is obliged to be responsible when the workers need health services in accordance with the benefits provided by <i>BPJS Kesehatan</i>Sampling documents of the 2 FFB transport contractor workers, it is known that workers do not have health and employment insurance.					
Non-Conformance Description (filled by auditor): The company has not been able to demonstrate that there is a system that ensures legal compliance with third parties it contracts with, for example in the aspect of fulfilling health and employment insurance.					
Root Cause Analysis (filled by organization audited): There has not been any firmness from the CH in enforcing contractors to fulfill the obligation of the work agreement (SPK) clause regarding the fulfillment of health and social security insurance to their workers.					
Correction (filled by organization audited): <ul style="list-style-type: none">Added a clause in the work agreement (SPK) with contractors which states: First term payment of work results must include proof of payment of Health and Social Security insurance contributions for each worker.Contractors register their employees for health and social security insurance programs.Proof of registration of the health and social security insurance program.					
Corrective Action (filled by organization audited): Monitor contractor evaluations including clauses on compliance with laws and regulations related to health and social security insurance.					
Assessor Evaluation and Conclusion (filled by auditor): Verification on 10 December 2021 When the Surveillance-4 activity was carried out, the company showed the evidence of improvement, here as follows: <ul style="list-style-type: none">Work agreement letter (SPK) between the company and a third party, namely CV. Sabitah Sukses Jaya Decree No. 084/BPK-EST/SPK/ANGKUTAN-TBS/IX-2021. In the SPK document, there's a clause that stated about health and social security insurance (BPJS).					

- Registration of social security insurance based on work contract between the third party and the company based on the time period in accordance with the work contract. The company then shows the determination of Social Security Insurance (BPJS) contributions for the October 2021 period which includes JHT, JKK, and JKM.
- Proof of payment for CV. Sabitah Sukses Jaya social security insurance in October 2021.
- Law Register document as the company's effort in monitoring contractor evaluation. In the document it is known that the company has been monitoring contractors in compliance with laws and regulations including health and social security insurance.

Based on the objective evidence, this non-conformity declared as comply.

Verified by : **Moh Arif Yusni**

NCR No.	:	2020.02	Issued by	:	Satria Adi Putra
Date Issued	:	13 November 2020	Time Limit	:	Next Surveillance (ASA-4)
NC Grade	:	Non-Critical	Date of Closing	:	10 December 2021
Standard Ref. & Requirement	:	4.2.2 Procedures are in place to ensure that the system is understood by affected parties, including those who cannot read and write.			
Evidence observed (filled by auditor): The company has a complaint handling procedure and dissemination as follows: <ul style="list-style-type: none">Minutes of dissemination of SOP for Management or Handling of Complaints and / or Complaints to community representatives of Mega Timur Village and Sungai Malaya Village on June 5, 2015 with procedural material referring to SOP04 / WIP-KB / (0) / 0610 Rev 0 in June 2010.Minutes of dissemination of SOP for Management or Handling of Complaints and / or Complaints to representatives of the community of Sungai Enau and Kubu Padi Villages on June 4, 2015 with material procedures referring to SOP04 / WIP-KB / (0) / 0610 Rev 0 in June 2010.Procedures for Acceptance of Complaints and Dispute Resolution, especially Out of Court Disputes (SOP04 / WIP-KB / (0) / 0610 Rev 0 as of June 2010).Procedure for Management / Handling of Complaints and / or Complaints with Document Number SOP60 / WIP-KB / (0) / 0915 Rev 0 dated 01 September 2015 and Document Number SOP60 / WIP-KB / (0) / 0915 Rev 01 dated 01 June 2020 Where the procedure has stipulated regarding submission to the RSPO Complaints System if the complaint does not reach consensus.					
Non-Conformance Description (filled by auditor): The company has not been able to demonstrate that the procedure has not regulated, but is not limited to: <ul style="list-style-type: none">A system that ensures that the complaint handling clause is understood by affected parties, including those who cannot read and write.					
Root Cause Analysis (filled by organization audited): So far, the company considers that the implementation of socialization is considered sufficient to provide understanding to the affected parties, including those who cannot read and write so that they are not included in the procedure.					
Correction (filled by organization audited): <ul style="list-style-type: none">Revise the SOP by adding a clause on the socialization of the complaint handling procedure: covering all affected parties including those who cannot read and write, by writing in the procedures for assistance/replacement for writing complaints.Review and simplification/combination of several SOPs for receiving and resolving complaints.					
Corrective Action (filled by organization audited): <ul style="list-style-type: none">Conduct socialization of the revised SOP.Evaluation of the results of the socialization of the SOP for complaints that have been submitted					

Assessor Evaluation and Conclusion (filled by auditor):
Verification dated December 10, 2021.

The company can show root analysis and preventive actions, besides that the company has also shown the following evidence:

- Revision of SOP 60/WIP-KB/(01)/0915 revision 02 dated January 6, 2021 regarding Procedures for Management/Handling of Complaints and/or Complaints, the procedure has added related explanations:
Point 13. Implementation of Communication and Consultation
 - a) Delivering/socializing company policies/standard operating procedures to stakeholders and conducting joint discussions in order to maintain the interests of both parties.
 - b) Socialization will be carried out by presenting written procedures and by showing pictures that can be understood by stakeholders who cannot read and write.
 - c) **Evaluate the results of the socialization of policies/standard operating procedures that have been submitted by providing an understanding of procedure questionnaires to stakeholders.**
 - d) **For stakeholders who cannot read and write the results of the evaluation by asking the same questions about the contents of the questionnaire and asking directly about the understanding of the delivery of socialization.** The question was submitted directly by the speaker of the socialization to stakeholders who cannot read and write. The results of the questions and questionnaires/evaluation results will be recorded by the PIC who is appointed as the Grievance/Complaints Registrar Administration.
- The company can show the minutes of the socialization of the SOP for handling complaints which were carried out on September 25, 2021, October 14, 2021, and October 21, 2021, which were carried out on representatives of village community leaders (Mega Timur Village, Sei Enau Village and Sungai Malaya Village. In addition, during activities Socialization must be ensured beforehand whether or not there are parties who cannot read and write.
- The company also shows examples of questionnaires that have been filled out by stakeholder representatives who participated in the socialization activities.

Based on the results of verification of the adequacy of the root cause analysis, preventive actions and evidence of improvements that have been shown by the company, **the non-conformance is declared comply**

Verified by : **Septian Maulana**

NCR No.	:	2020.03	Issued by	:	Arif Faisal Simatupang
Date Issued	:	13 November 2020	Time Limit	:	11 February 2021
NC Grade	:	Major	Date of Closing	:	11 February 2021
Standard Ref. & Requirement	:	6.2.1 Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.			
Evidence observed (filled by auditor): Based on the results of a study of the harvester's wage payment documents (permanent and temporary workers) with the unit-based payment system in Division 2 Phase 4 in October 2020, it is known that of the 40 harvesters, only 13 harvesters (33%) get the average wage per day according to/exceed the minimum payment (Rp. 97,320 /day), while the remaining 27 harvesters (68%) received an average wage per day below the minimum payment (UMK).					
Non-Conformance Description (filled by auditor): The implementation of the harvester payment by unit-based payment system is still not in accordance with Government Regulation No. 78 of 2015 concerning wages. Where in Article 35 letter b, it is stated that the average income per day for workers in the unit of yield system must not be less than the provincial or district / city minimum wage.					
Root Cause Analysis (filled by organization audited): Harvesters who receive wages below the UMK are workers who work less than 7 hours of work, and lack of monitoring in employee working hours.					

Correction (filled by organization audited): Attach the attendance of harvesting workers who earn less than the UMK.	
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> Create manual attendance for all harvesting workers, enforce recording of hours of work in and after harvest work. Monitoring attendance for workers, so that harvesters work according to working hours and harvest results, to ensure that the number of results and work hours of harvesters are appropriate 	
Assessor Evaluation and Conclusion (filled by auditor): Verification on 11 February 2021: The company conducts a root cause analysis which states that workers who earn less than the UMK are due to being less productive in working hours, namely working less than 7 hours per day. The company shows evidence of the absence of harvest workers who earn less than the UMK in the period 17-30 November 2020, with an overview that there are still many workers who work less than 7 hours (up to only 3 hours of work). This nonconformity is declared as comply and will be evaluated for the implementation of corrective action, namely monitoring employee working hours so that they can work optimally 7 hours per day.	
Verified by	: Arif Faisal Simatupang

NCR No.	: 2020.04	Issued by	: Arif Faisal Simatupang
Date Issued	: 13 November 2020	Time Limit	: 11 February 2021
NC Grade	: Major	Date of Closing	: 11 February 2021
Standard Ref. & Requirement	6.2.3 There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.		
Evidence observed (filled by auditor): Based on the review of the employee attendance documents on night security from January to October 2020, there were 5 casual/temporary daily work with the initials AM, IR, ID, IW, IY (employee numbers BX/BPK/0415/1531, BX/BPK/1009/1054, BX/BPK/0309/964, BX/BPK/0310/1087, BX/BPK/0309/920) who work more than 21 working days in each month and more than three months consecutively.			
Non-Conformance Description (filled by auditor): The implementation of the company's manpower system is still not in accordance with the Labor Minister Lay No. 100 of 2004 concerning the provisions for the implementation of a specified time work agreement, Article 10 explains that if a worker works 21 days or more for 3 consecutive months or more, then the casual/temporary daily work agreement shall be changed to permanent worker			
Root Cause Analysis (filled by organization audited): Lack of evaluation of casual employees who have worked 3 months for 21 working days or more. Some of the workers who have not been appointed as PKWTT are workers who are considered ineffective working for 7 hours of work.			
Correction (filled by organization audited): <ul style="list-style-type: none"> Evaluate casual employees who have worked for 3 consecutive months Appointment of employees to PKWTT (KHT) employees for employees / workers who work 21 days or more consecutively and have met the requirements according to the evaluation results 			

Corrective Action (filled by organization audited):

- Make monitoring of the list of casual workers who work in the company
- Assessing the performance of all casual workers who work in the company after a 3-month work period

Assessor Evaluation and Conclusion (filled by auditor):

Verification on 11 February 2021:

The company evaluates casual employees who work more than 21 days a month for three months or more. The five employees have been appointed as permanent employees with the following letters of appointment:

- Appointment letter of initials name IY No. 001/BPK-HRR/SK/I/2021 dated 23 December 2020.
- Appointment letter of initials name ID No. 002/BPK-HRR/SK/I/2021 dated 23 December 2020.
- Appointment letter of initials name IW No. 003/BPK-HRR/SK/I/2021 dated 23 December 2020.
- Appointment letter of initials name AM No. 004/BPK-HRR/SK/I/2021 dated 23 December 2020.
- Appointment letter of initials name IR No. 005/BPK-HRR/SK/I/2021 dated 23 December 2020.

Based on the root cause analysis, corrections, and corrective actions submitted, this non-conformity is declared as comply.

Verified by	:	Arif Faisal Simatupang
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3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-4 Assessment Remote Audit)

NCR No.	:		Issued by	:	
Date Issued	:		Time Limit	:	
NC Grade	:		Date of Closing	:	
Standard Ref. & Requirement	:				
Evidence observed (filled by auditor):					
DURING ASA 1.4, THERE WERE NO NON-CONFORMITIES AGAINST RSPO P&C STANDARD.					
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. Identification of Findings, Corrective Actions and Observations at ASA-4 and Recertification Assessment

NCR No.	: 2022.01	Issued by	: Radytio Puspanjana
Date Issued	: 1 July 2022	Time Limit	: Next Surveillance
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.		

Evidence observed (filled by auditor):

As a form of social management, the company has developed/compiled by involving independent parties in conducting social impact assessments related to the company's operational activities. The first social impact assessment was carried out in May 2015 by Remark Asia as a follow-up to the results of the assessment, there are several recommendations/matrixes for the management plan and monitoring of social impacts, including:

- Company relationships and interactions.
- Plasma plantation certificate.
- CSR and surrounding village development programs.
- Conflict handling
- Grievance and complaint mechanism.

As an effort to improve and pay attention to the latest situation, in 2021 the company will carry out a Social Impact Review and Update, i due to the dynamic social situation and the seriousness of the company to build and maintain the company's sustainability. The SIA review includes:

- Job opportunities and business opportunities.
- Consultation and communication.
- Perception of the company.
- Occupational Health and Safety.
- Employee facilities and benefits

As a follow-up to the review, the company then developed a social management and monitoring plan, namely:

Impact from External	Impact from Internal
- Employment Opportunity	- Job opportunities.
- Consultation and communication	- Consultation and communication
- Perception of the company	

In the SIA process carried out in 2021, the company has involved various stakeholders, however:

- External stakeholders involved in the preparation of the management plan and social monitoring are still limited to a few affected stakeholders such as Mega Timur Village (head of village and community leaders), Sungai Enau Village (head of village, local contractors, secretary of village, Village Deliberation Agency), Kuala Mandor B Village (Chairman of Village Deliberation Agency) and Sungai Malaya Village (head of village and community leaders) carried out in October 2021, not yet paying attention to the widely affected parties, such as women, the government, plasma farmers, those who use nearby water resources, and occupant.
- Internal stakeholders have not been directly involved in the management plan and social monitoring including by paying attention to the wider representation of workers such as local workers, migrants, women, new workers including casual workers.

Furthermore, the results of the document review and interviews with management and stakeholders (internal and external) revealed that the company had carried out social management and monitoring, which was carried out partially by the relevant departments, so that the reports on activities carried out were not comprehensive and integrated, for example:

- Employment and OSH impacts are managed by PGA and EHS.
- Environmental Impact and HCV managed by EHS and Conservation.

- External Impact (legal and social) managed by SSL (Social, Security and License).
- Plantation and POM operational activities are managed by the plantation and POM operational team.

By being carried out partially by the relevant departments, there are potential impacts that arise but are not fully documented and integrated on several issues that are currently developing or in the future, for example, but not limited to:

- Attention related to labor issues (employee status, low worker productivity, use of casual workers, wage issues).
- Attention to the issue of fruit theft / FFB.
- Attention related to legality issues and land conflicts (HGU validity period, land status after HGU expires).
- Attention related to the issue of water pollution and HCV being occupant area.
- Concerns related to flood issues, CSR dissatisfaction.
- Attention to the impact of operational activities on best cultivation and processing practices by companies, both plantations and mills.

Non-Conformance Description (filled by auditor):

The social impact management and monitoring plan not developed with the participation of widely affected stakeholders so that there are several issues didn't identified and stated in the SIA Review report including the social management and social monitoring which are integrated by involving various relevant departments.

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

NCR No.	: 2022.02	Issued by	: Yudhi Yuniarto Tallutondok
Date Issued	: 1 July 2022	Time Limit	: Next Surveillance
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 6.2.7 Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.		
Evidence observed (filled by auditor):			
Based on document review show that the certification unit has determined the type of permanent work by referring to the GAPKI Decree No. SK/002/PPG/II/2013 concerning the flow of work implementation processes in the oil palm plantation business sector. In the attachment to the decree, it is explained that the work of harvesting and processing FFB into CPO is the main activity. Based on field observation and interviews with harvester in Phase 3 Block 127, it was found that casual workers have been working since October 1, 2021. During the audit process, the certification unit was able to show a list of plantation employees for the period of June 2022, from the list of employees it was found that there were 35 harvest employees. with the status of casual workers who have started working since 2021 until now, for example employees with work agreements as follows:			
1. SPK dated October 1, 2021 for employees with the initials AB.			
2. SPK dated October 23, 2021 for employees with the initials MW.			
3. SPK dated October 1, 2021 for employees with the initials MB.			
4. SPK dated October 1, 2021 for employees with the initials MF.			
5. SPK dated December 21, 2021 for employees with the initials SD.			

6. SPK dated September 1, 2021 for employees with the initials DN.	
Non-Conformance Description (filled by auditor): The certification unit has not been able to show evidence that the main work has been done by permanent workers	
Root Cause Analysis (filled by organization audited):	
Correction (filled by organization audited):	
Corrective Action (filled by organization audited):	
Assessor Evaluation and Conclusion (filled by auditor):	
Verified by	:

NCR No.	: 2022.03	Issued by	: Yudhi Yuniarto Tallutondok			
Date Issued	: 1 July 2022	Time Limit	: Next Surveillance			
NC Grade	: Minor	Date of Closing	:			
Standard Ref. & Requirement	: 6.7.4 All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.					
Evidence observed (filled by auditor): <p>Based on verification document and interviews with management and workers both casual daily worker and permanent worker it is known that all workers have received work accident insurance through <i>BPJS Ketenagakerjaan</i>, this is proven by being able to show proof of <i>BPJS Ketenagakerjaan</i> payments for casual daily worker and permanent worker.</p> <p>Meanwhile, health services for permanent worker have been included in the <i>BPJS Kesehatan</i> program. Meanwhile, for the casual daily worker, certification unit show a letter from <i>BPJS Kesehatan</i> No. 2284/IV-02/1216 dated December 20, 2016 concerning the Directives of Freelancing Casual Daily Workers which explains that:</p> <ol style="list-style-type: none"> Casual daily workers cannot be grouped into wage-earning workers whose payment of health insurance contributions is 5% of the salary or wages received regularly every month where 4% is paid by the employer and 1% is paid by the worker. If a business entity wishes to include casual daily workers (BHL) into <i>BPJS Kesehatan</i>, the health insurance guarantee is in accordance with the provisions as non-wage workers. <p>Based on verification document of <i>BPJS Kesehatan</i> payment documents are known that the certification unit only includes Permanent Worker, for example</p> <ol style="list-style-type: none"> Payment proof of <i>BPJS Kesehatan</i> for estate employees for the March 2022 period which was paid on April 8, 2022 for 546 employees while the number of employees is 668 employees so there is a difference of 122 employees who are not paid. Payment proof of <i>BPJS Kesehatan</i> for estate employees for the April 2022 period which was paid on April 8, 2022 for 546 employees while the number of employees is 663 employees so there is a difference of 117 employees who are not paid. Payment proof of <i>BPJS Kesehatan</i> for estate employees for the May 2022 period which was paid on May 11, 2022 for 545 employees while the number of employees is 662 employees so there is a difference of 117 employees who are not paid. Payment proof of <i>BPJS Kesehatan</i> for estate employees for the June 2022 period which was paid on June 10, 2022 for 543 employees while the number of employees is 668 employees so there is a difference of 125 employees who are not paid. <p>Based on interviews with management and casual daily workers if there are workers who are sick can be treated at the Company Clinic for free. However, the certification unit has not been able to explain the treatment if the patient requires further action if it cannot be handled at the certification unit clinic.</p>						
Non-Conformance Description (filled by auditor): <p>The certification unit has not been able to show evidence that all workers have been provided with health services that are equal to all employees.</p>						
Root Cause Analysis (filled by organization audited):						
Correction (filled by organization audited):						
Corrective Action (filled by organization audited):						
Assessor Evaluation and Conclusion (filled by auditor):						
Verified by	:					

3.4.4. Opportunity for Improvement

No	Ref. Std.	Description
1	3.2.1	Based on document verification show that the certification unit still employs employees with casual daily status where there are casual daily workers who have worked for more than 10 years. According to labour regulations, casual daily workers do not work more than 20 days and are paid based on units of output with daily wages. Based on this, workers do not get the minimum wage due to limited working days. Certification unit in this case are encouraged to provide equal employment opportunities for all employees, for example in terms of employee status or income
2.	3.7.1	<p>The certification unit shows the operator license documents as follows:</p> <ol style="list-style-type: none"> 6. Bachoe Loader License on behalf of Eko Susanto with Reg. 89526-OPK3-LT/PAA/VI/2017 dated 9 June 2017 with a validity period until 9 June 2022. (Expired). 7. Wheel Loader License on behalf of Suwanto with No. 14,40964-OPK3-PAA/IX/2014 dated 26 September 2014 with a validity period until 26 September 2019. (Expired) 8. Boiler License on behalf of Wendi with Reg. 10762.OPK3-PUBT-B.II/2017 dated January 30, 2017 with a validity period until January 30, 2022. (Expired) 9. Competency certificate for welding industry services for the 3G-SMAW welding process with No. Reg. JIP 024.00000064.2017 dated 10 May 2017 which is valid for 3 years. (Expired) 10. Competency certificate for welding industry services for the 4G-SMAW welding process with No. Reg. JIP 024.0000272.2017 dated 31 May 2017 which is valid for 3 years. (Expired) <p>In this regard, the certification unit has submitted an extension as stated in the letter below:</p> <ul style="list-style-type: none"> • Letter from Sr. HRR Manager to the Director General of <i>Binwasnaker & K3</i> Ministry of Manpower RI with No. 370/BPK-HRR/EXT/XII/2021 dated December 15, 2021 regarding the extension of the lifting equipment operator license. • Letter from Sr. HRR Manager to the Director General of <i>Binwasnaker & K3</i> Ministry of Manpower RI with No. 374/BPK-HRR/EXT/XII/2021 dated 15 December 2021 regarding the extension of the boiler operator license. • Letter from Sr. HRR Manager to the Director General of <i>Binwasnaker & K3</i> Ministry of Manpower RI with No. 375/BPK-HRR/EXT/XII/2021 dated December 15, 2021 regarding the extension of the welder's license. <p>Until the audit activity takes place, the license extension has not yet been issued. In this regard, the certification unit in this case has the opportunity to ensure the progress of the extension of the OHS operator license. OFI</p>
3.	7.8.1	<p>The company has tested the surface water quality as described in the RKL-RPL document for semesters I & II of 2021, for Mill it is carried out upstream & downstream of the Landak river while in Estate on the upstream & downstream Malaya river, upstream & downstream Parit tenaga Baru river, Parit Gotong Royong River, Parit Kongsi River and Ampaning River upstream & downstream. The results of the analysis of test data for the last 5 years also show that several parameters are above the quality standard and experience fluctuations in several parameters of BOD, COD and PH. The results of interviews with the company and a review of the RKL-RPL document for Semester 2 of 2021, information was obtained that the increase in some of these parameters was due to the decomposition of organic matter in peatlands and the large number of activities in surrounding villages that used water around them using bath wash toilet (MCK), while the low PH value caused oxygen dissolved in water is reduced. Currently the evaluation model carried out by the company is to compare the results of the analysis of the current period with the previous period.</p> <p>Based on this document, the company has evaluated data from monitoring results from time to time (time series data) for aspects of the impact of decreasing water quality, namely for semesters I & II of 2021 to assess trends in environmental quality changes caused by an operational activity.</p> <p>Based on this, the company has an improvement opportunity to conduct an analysis related to surface water test results that are not in accordance with quality standards in a comprehensive and comprehensive manner covering all parameters, management of potential pollution that may occur, as well as mitigation actions.</p>

3.4.5. Noteworthy Positive Components

No	Description
1	The company's commitment in implementing sustainable standards for oil palm plantations.
2	Good teamwork and documents' presentation during the assessment.

3.5 Summary of Arising Issues from Public and Auditor Verification



Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>National Land Agency of Kubu Raya Regency</p> <p>The certification unit has complied with applicable regulations related to land legality, among others, has had location permits, plantation business permits (IUP), land titles (HGU), and has routinely sent land use reports.</p> <p>Administratively, the land title of PT BPK is valid for 30 years starting from 1996 until 2026. In the concession of PT BPK there is an area occupied by the community (Occupation) and the National land Agency recommends that the area be released. The company explained that will be carried during the extension of HGU.</p>	<p>Regarding land issues has been verify and described in Criteria 4.8</p>
<p>Department of Manpower and Transmigration of Kubu Raya Regency</p> <ol style="list-style-type: none"> 1. In the last two years period there were no industrial relations problems. 2. The CLA is still valid today 3. Worker union has been formed without any intervention from the certification unit. 4. Work carried out by third parties has been reported along with the fulfillment of employee rights including salary slips and health insurance. 5. There are no complaints regarding the granting of rights and facilities provided by the certification. 6. All workers have been registered in the health insurance and employment insurance programs 	<p>There are no negative issues that require further classification in terms of employment issue</p>
<p>Environmental Agency of Kubu Raya Regency.</p> <ul style="list-style-type: none"> - The company has EIA documents and has received environmental feasibility on 2004. - The company has a Temporary Hazardous Waste Storage located on Mill and Estate, approved by Kubu Raya Regency on 2020. - Hazardous Waste management activities carried out by storing hazardous Waste in licensed hazardous waste storage and transported have permission by KLH. Quarterly management reporting to relevant agencies. - The company has POME disposal permit to surface water. - The company has tested the quality of factory wastewater per month and reported the results of testing to Enviromental Agency Kubu Raya Regency per quarter. - The company has conducted POME quality testing per Quarterly and reports the results of testing to Enviromental Agency Kubu Raya Regency. - The company has conducted noise, vibration and noise testing and reported the results of testing to Enviromental Agency Kubu Raya Regency per semester. - The company has reported Hazardous waste (balance and 	<p>According to field observation, there are no environment pollution from estate and mill operational.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>manifest) management to Enviromental Agency Kubu Raya Regency per quarter.</p> <ul style="list-style-type: none"> - The company has sent the RKL / RPL implementation report to to Enviromental Agency Kubu Raya Regency periodically, for example the semester 2 year 2021. - The company has managed the conservation area / HCV for example in the form of riparian. - Requests for information responded quickly by the management unit. - There have not been any issues and reports from other parties regarding the negative impacts on the environment due to the management of Estate and POM. - The company needs to ensure that it is related to the management of domestic liquid waste management permits. 	
<p>Plantation Department of Kuburaya Regency</p> <p>There has never been any direct information from the community regarding coercion in land compensation. However, there are issue regarding that land title is no longer valid, there have been several meetings involving the local government as well as interest parties</p> <p>For the Kuburaya area, CSR is prepared in collaboration with the local government so that it does not overlap with other villages. However, if there is still a direct request from the surrounding village, the company will still provide the assistance.</p> <p>There is no issue regarding fire issue / land burning in the company operational. The certification unit has conducted training on green pesticides that are environmentally friendly in 2020 and 2021 by informing the results of the training to the Plantation Agency.</p>	<p>Regarding land issues has been verify and described in Criteria 4.8</p>
<p>Cooperative Mekar Lestari</p> <ul style="list-style-type: none"> - The boundaries between lots are marked with permanent stakes, road and trench - Operational activities is done by the farmers. PT BPK only supervises plantation activities. - Annual meeting conducted once a year, while operational work meeting also conducted one a year. - FFB payment is according to FFB price determined by Plantation Agency of Kalimantan Barat Province. There is no complaint about late payment. - PPE is provided by cooperative. Cooperative also provide storage to keep the PPE. - If there are complaints from members of the cooperative, it is submitted to PT BPK by the public relations department. - Changes in the FFB price set by the government are informed by whatsapp group or can contact the chairman 	<p>There are no negative issues related to the company, and verification has been carried out in the report.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>of the cooperative directly.</p> <ul style="list-style-type: none"> - Total area of cooperative land 1818 Ha. 	
<p>Cooperative Tuah Jubata</p> <ul style="list-style-type: none"> - The boundaries between lots are marked with permanent stakes, road and thrench - Operational activities is done by the farmers. PT BPK only supervises plantation activities. - Annual meeting conducted once a year, while operational work meeting also conducted one a year. - FFB payment is according to FFB price determined by Plantation Agency of Kalimantan Barat Province. There is no complaint about late payment. - PPE is provided by cooperative. Cooperative also provide storage to keep the PPE. - If there are complaints from members of the cooperative, it is submitted to PT BPK by the public relations department. - Changes in the FFB price set by the government are informed by whatsapp group or can contact the chairman of the cooperative directly 	<p>There are no negative issues related to the company, and verification has been carried out in the report.</p>
<p>Kuala Mandor B Community Elder</p> <p>PT BPK started operationally in the period 1990 – 2000 with the first planting starting in 1996. Which divided own estate and scheme smallholders. Regarding scheme smallholders, there are demands from the community to increase the land legality/land status which currently SKT to became freehold title.</p> <p>The existence of the company has a positive impact on the community, including opening access roads for the community and improving the economy of the village community. Currently, there is no negative issue about environmental aspects, pollution, or land dispute in Kuala Mandor B village, however, there is an issue regarding the land dispute in Sungai Enok Village.</p>	<p>Regarding land issues has been verify and described in Criteria 4.8</p>
<p>Village Head of Sungai Enau</p> <p>PT BPK started operationally in the period 1990 – 2000 with the first planting starting in 1996. Which divided own estate and scheme smallholders.</p> <p>There are community groups/farmer groups in Sungai Enau Village who consider that the land title of PT BPK is valid until 2021 or 25 years as promised at the time of the initial preparation/ compensation. However the claimers revealed that they could not show any related evidence.</p> <p>During the period of 2021 there were several grievance from those community regarding those issue there have been</p>	<p>Regarding land issues has been verify and described in Criteria 4.1; 4.2 and 4.8</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
several meetings involving the local government as well as interest parties	
Megah Timur Village <ol style="list-style-type: none"> 1. During the land compensation process there was never any coercion from the certification unit. 2. This information has not reached the village authorities and the relationship between the village and the certification is currently in good condition. 3. The certification unit always provides assistance in the form of ditch cleaning based on community requests. 4. The certification unit always carries out socialization related to water pollution to floating net cage farmers, besides that there are also marine cages located near the certification unit and so far they are still active and the fish are in fresh condition. So far there have been no problems related to water quality. 5. CSR submissions are based on village deliberation decisions. The hope of the community is that the certification unit can employ the surrounding community. It is not difficult to apply for CSR to certification unit's. 	There are no negative issues related to the company, and verification has been carried out in the report.
Terraju Foundation Based on public consultation through email there are several issues regarding PT BPK, and its available in RSPO Website,	This issue has been verify by auditor as part of this audit reports in criteria 4.1; 4.3; 4.4; 4.8; 6.2; 6.7; 7.7
Worker Union at Mill and Estate (Serikat Buruh Sejahtera Indonesia) <ol style="list-style-type: none"> 1. Currently, there are 120 members. 2. The certification unit has implemented the District Minimum Wage. 3. The certification unit lends a place to worker union which is used as an office. Audiences with the certification unit are conducted monthly. The certification unit is quite responsive regarding employee complaints. 4. Work accidents that occur are just like being hit by a thorn, nothing causes disability and death. 5. The certification unit has distributed PPE to workers, and has carried out periodic and special health checks for workers handling pesticides. 	There are no negative issues related to the company, and verification has been carried out in the report.
Gender committee representative (PT. Bumipratama Khatulistiwa Mill dan Estate) <ul style="list-style-type: none"> • During 2021 to 2022 there were no reports of sexual harassment of female workers • There has been socialization regarding the rights of women workers, including menstrual leave, the right to breastfeed children at work, pregnancy check-ups, 	In general, there are no negative issues that need further clarification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> • There is no discrimination in employment opportunities and promotion opportunities for female workers • The gender committee routinely identifies pregnant and lactating women, to ensure that female workers can work properly 	
Local Contractor (CV Cipta Sejahtera Abadi) <ol style="list-style-type: none"> a. The agreement has been agreed by both parties. b. CV Cipta Sejahtera Abadi is a construction company which one of its projects is employee housing construction. c. Contractor provides PPE to workers. d. There were no complaints regarding payments and payments in accordance with the work agreement. e. The certification unit has also provided work accident insurance to all employees. 	<p>There is no negative issue related to local contractor.</p>
CV. Bintang Borneo (FFB Supplier) <p>The company receives FFB from third parties provided that FFB supplied is not the result of looting, theft or FFB produced by looting state forests. It is stated in the agreement based on the agreement between the two parties, further explained that the payment was made on time in accordance with the contents of the agreement and there had never been a problem in terms of payment.</p>	<p>The company has demonstrated its commitment and mechanism so that FFB received is not from illegal activities. in addition documentation has been shown that the payment of the contractor's results has been paid according to the agreement and on time. Described in detail indicator related.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end; margin-top: 100px;"> <div style="text-align: center;"> <p>PT Bumi Pratama Khatulistiwa Management Representative</p>  <p><u>Sigit Hadi Poernomo</u> Friday, 01 Juli 2022</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Moh. Arif Yusni</u> Friday, 01 Juli 2022</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Plantation Agency of Kubu Raya Regency	Kubu Raya Regency	-	Phone Interview	28 June 2022	✓	
2	Environmental Agency of Kubu Raya Regency	Kubu Raya Regency	-	Interview by phone	28 June 2022	✓	
3	National Land Agency of Kubu Raya Regency	Kubu Raya Regency	-	Phone Interview	28 June 2022	✓	
4	Department of Manpower and Transmigration of Kubu Raya Regency	Kubu Raya Regency	-	Interview by phone	28 June 2022	✓	
5	Gender committee representative PT. Bumipratama Khatulistiwa Mill	Bumipratama Khatulistiwa Mill	-	Direct interview	28 June 2022	✓	
6	Gender committee representative PT. Bumipratama Khatulistiwa Estate	Bumipratama Khatulistiwa Estate	-	Direct interview	29 June 2022	✓	
7	Worker Union at Mill and Estate (Serikat Buruh Sejahtera Indonesia)	Bumipratama Khatulistiwa Mill	-	Direct interview	28 June 2022	✓	
8	Local Contractor (CV Cipta Sejahtera Abadi)	Kubu Raya Regency	-	Phone Interview	28 June 2022	✓	
9	CV. Bintang Borneo (FFB Supplier)	Kubu Raya Regency	-	Phone Interview	28 June 2022	✓	
10	Cooperative Mekar Lestari	Kubu Raya Regency	-	Phone Interview	28 June 2022	✓	
11	Cooperative Tuah Jubata	Kubu Raya Regency	-	Phone Interview	28 June 2022	✓	
12	Kuala Mandor B Community Elder	Kubu Raya Regency	-	Phone Interview	28 June 2022	✓	
13	Village Head of Mega Timur	Kubu Raya Regency	-	Phone Interview	28 June 2022	✓	
14	Village Head of Sungai Enau	Kubu Raya Regency	-	Phone Interview	28 June 2022	✓	
15	Police Officer	Kubu Raya Regency	-	Direct interview	29 June 2022	✓	
16	Sawit watch	Bogor, Indonesia	info@sawitwatch.or.id	Email	22 June 2022	-	✓
17	WWF	Jakarta, Indonesia	wwf-indonesia@wwf.or.id	Email	22 June 2022	-	✓
18	WALHI	Jakarta, Indonesia	informasi@walhi.or.id	Email	22 June 2022	-	✓

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
19	AMAN	Jakarta, Indonesia	rumahaman@cbn.net.id	Email	22 June 2022	-	✓
20	NGO	Pontianak, Indonesia		Email	22 June 2022	✓	
21	Ecoton	Surabaya Jakarta	ecoton.kalissurabaya@gmail.com	Email	28 June 2022	-	✓
19	BPK POM <ul style="list-style-type: none"> • 1 WTP operator • 1 EFB area operator • 1 WWTP operators • 1 Reservoir operator • 12 Process workers 	PT BPK	-	Field observation and direct interview	28 June 2022	✓	
20	BPK Estate <ul style="list-style-type: none"> • 1 PIC HGU stake monitoring. • 1 PIC HCV monitoring and management area. • 23 Estate workers and 4 estate supervisors 	PT BPK	-	Field observation and direct interview	29 June 2022	✓	

Appendix 2. Assessment Program

1. Remote Audit

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

2. Onsite Audit

DATE	27 JUNE – 01 JULY 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
MONDAY, 27 JUNE 2022		
06.00 – 08.00	JAKARTA → PONTIANAK	All Auditor
08.30 – 10.00	PONTIANAK → PT BUMIPRATAMA KHATULISTIWA	All Auditor
11.00 – 12.00	Opening meeting (recorded video conference) <ul style="list-style-type: none">- Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)- Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)	
09.30 – 15.00	Public consultation with stakeholder to relevant agency in Kubu raya Regency (by Phone)	All Auditor
12.00 – 14.00	Break	
14.00 – 17.00	<ul style="list-style-type: none">• Verification of Basic Information Mill and Estate• Confirmation of Time Bound Plan• Review of Partial Certification• Document review and completing audit checklist.	All Auditor
TUESDAY, 28 JUNE 2022		
08.00 – 12.00	Konsultasi Stakeholder <ul style="list-style-type: none">- Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier and scheme smallholders- Stakeholder consultation to affected communities surrounding the plantations and previous land owner as well as Local NGO (by Phone)	All Auditor
12.00 – 14.00	<ul style="list-style-type: none">• Break	
14.00 – 16.15	Field observation to Bumipratama Khatulistiwa POM: <ul style="list-style-type: none">- Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO)- Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond)	All Auditor
16.15 – 17.00	<ul style="list-style-type: none">- Implementation of Employment Procedure and Mechanism Aspect Presentation of Daily Progress	
WEDNESDAY, 29 JUNE 2022		
08.00 – 12.00	Field Observation to Bumipratama Khatulistiwa Estate Aspect to be verified : <ul style="list-style-type: none">- Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Implementation of Legal Aspect (Land Ownership, Legal Boundaries);- Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)	All Auditor

DATE	27 JUNE – 01 JULY 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none">- Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)- Observation of Workers Facilities (Housing, School, Worship Place).	
12.00 – 14.00	<ul style="list-style-type: none">• Break	All Auditor
14.00 – 16.00	Verification of stakeholder consultation result and field visit. <ul style="list-style-type: none">• Document review and completing audit checklist.	All Auditor
16.15 – 17.00	<ul style="list-style-type: none">• Presentation of Daily Progress	
THURSDAY, 29 JUNE 2022		
08.00 – 12.00	<ul style="list-style-type: none">• Continued virtual field observation and Public Consultation if needed)• Document review and completing audit checklist.	All Auditor
12.00 – 14.00	Break	
16.00 – 17.00	<ul style="list-style-type: none">• Verification of stakeholder consultation result and field visit.• Document review and completing audit checklist.	All Auditor
16.15 – 17.00	<ul style="list-style-type: none">• Presentation of Daily Progress	
FRIDAY, 01 JULY 2022		
08.00 – 09.00	Internal discussion by auditor team preparing for Closing Meeting	All Auditor
09.00 – 10.30	Closing Meeting <ul style="list-style-type: none">• Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion)/• Comments, Responses and Questions	
10.30 – 12.00	PT BUMIPRATAMA KHATULISTIWA → PONTIANAK	All Auditor
14.00 – .00	PONTIANAK → JAKARTA	