

Roundtable on Sustainable Palm Oil Certification R S P O

[✓] Surveillance

Name of Management Organization : Nabire Matoa Palm Oil Mill of PT Nabire Baru – subsidiary of Goodhope Asia Holdings, Ltd.
 Plantation Name : PT Nabire Baru: Bukit Nuhgojaje Estate, Sungai Wami Estate, Kali Bambu Estate, KPMA Wate Asiaina and KPMA Waoha
 PT Sariwana Adi Perkasa: Sungai Sima Estate and KPMA Sarakwari & Koroba
 Location : Village of Wami, District of Yaur, Regency of Nabire, Province of Papua, Indonesia
 Certificate Code : **MUTU-RSPO/167**
 Date of Certificate Issue : 14 February 2022 Date of License Issue : 14 February 2023
 Date of Certificate Expiry : 13 February 2027 Date of License Expiry : 13 February 2024

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1	17 to 22 & 24 to 25 October 2022	Briyogi Shadiwa (Lead Auditor), Rindu Galih Rezza Rachmansyah, Erika Lucitawati, Sabiah Dhiningtyas Utami	Hasiholan Sihombing	Leonada

Assessment	Approved by PT Mutuagung Lestari on:
ASA-1	23 November 2022

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Figure 1. Location Map of PT Nabire Baru

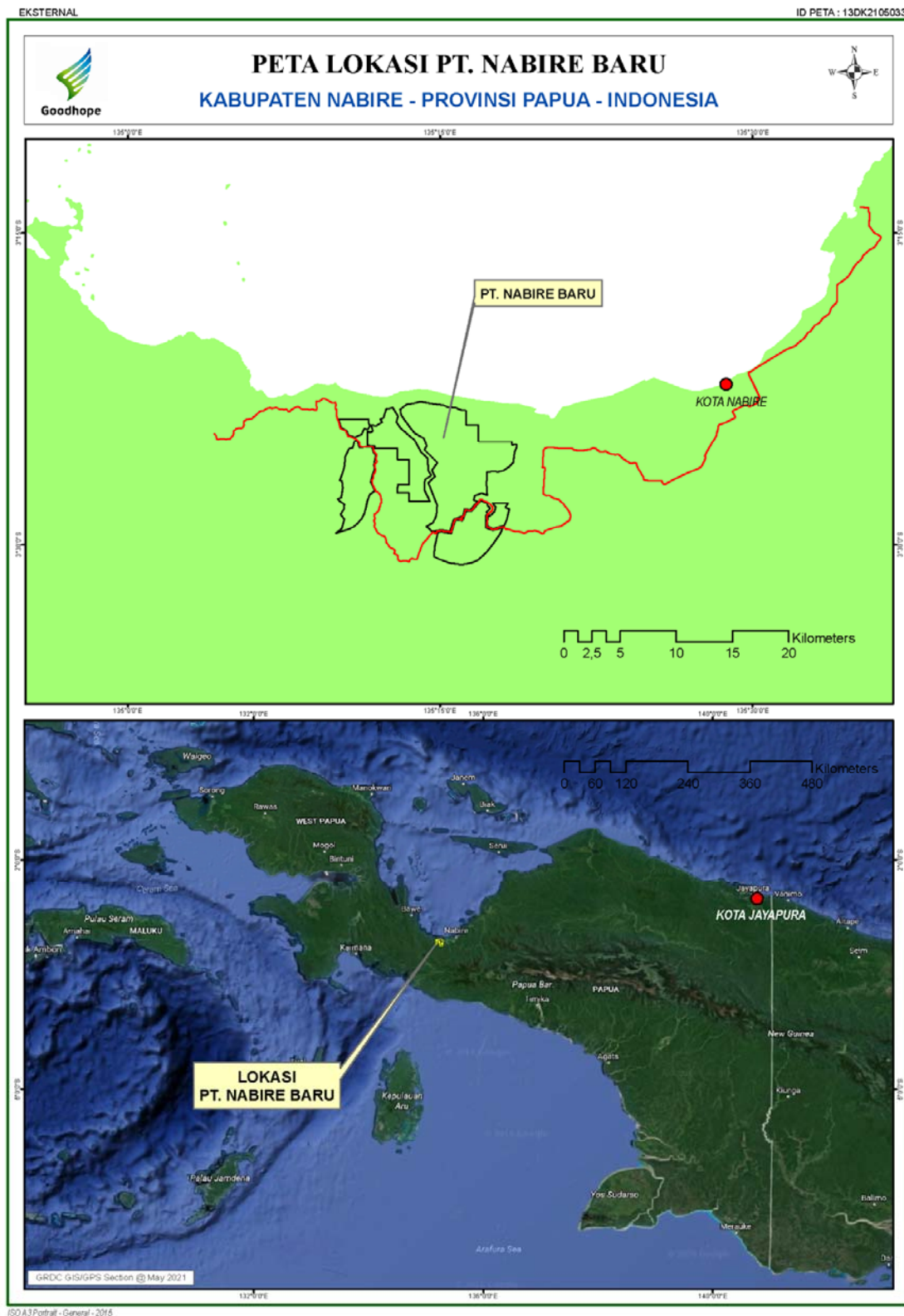


Figure 2. Location Map of PT Sariwana Adi Perkasa

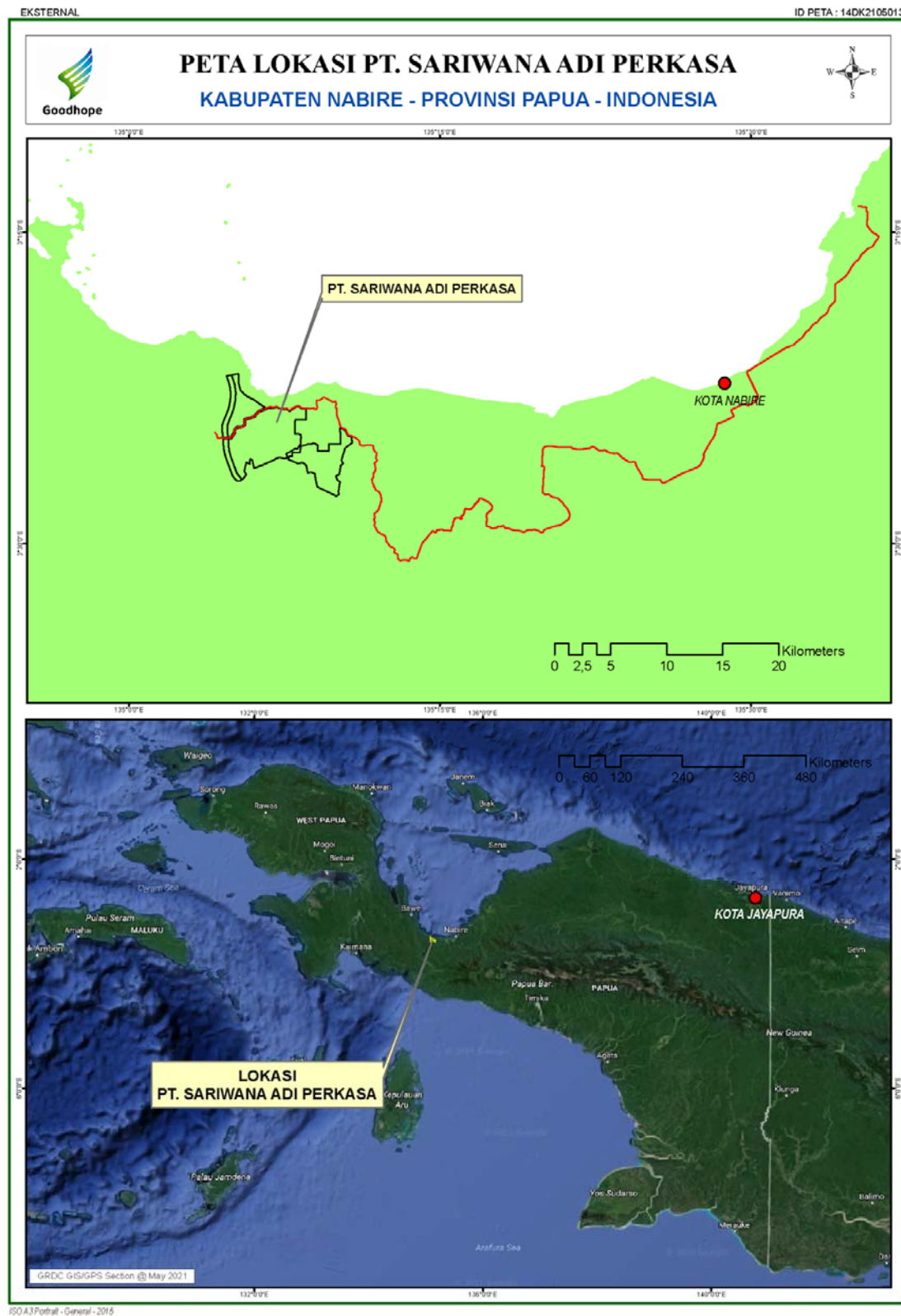
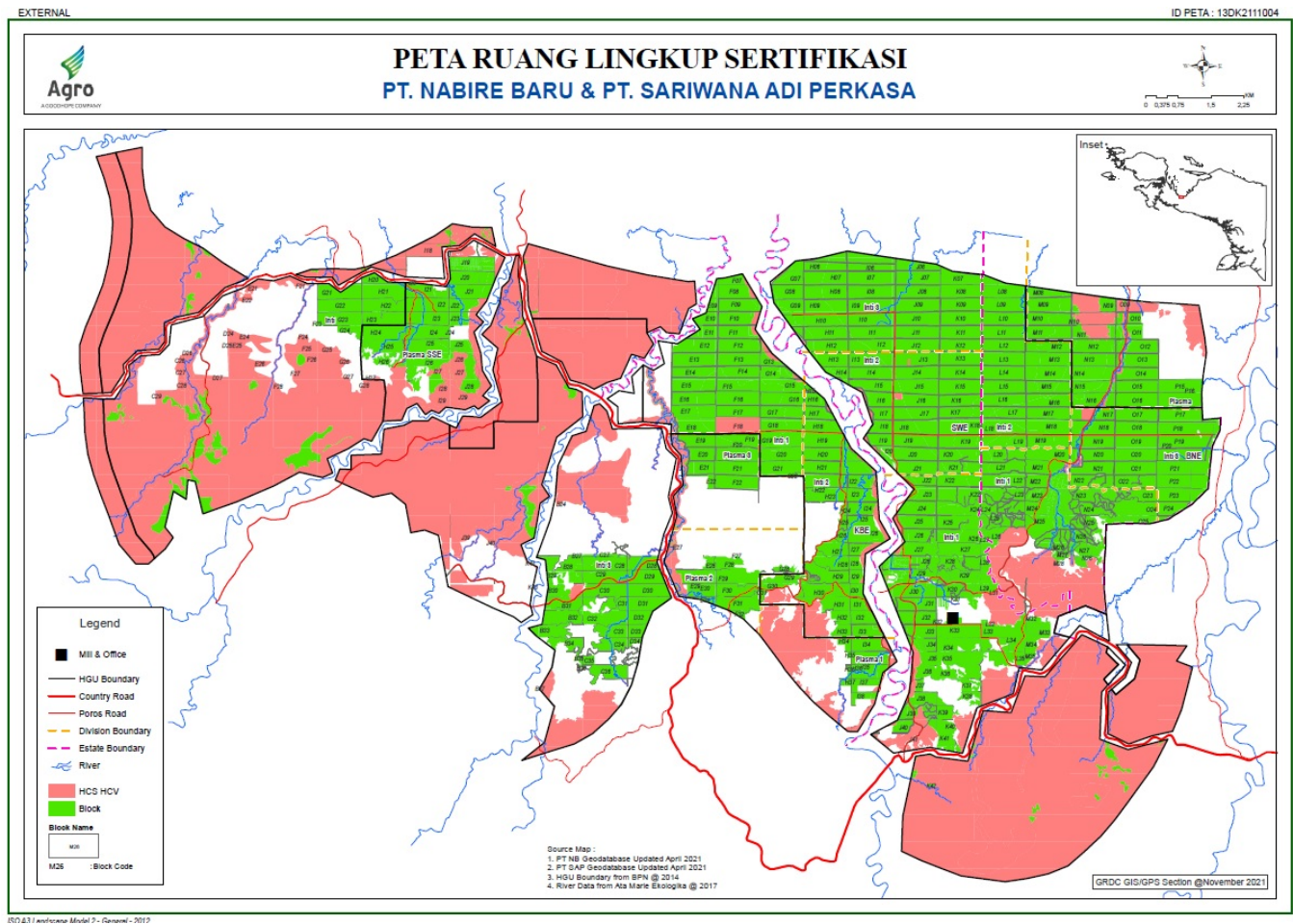


Figure 3. Operational Map of PT Nabire Baru and PT Sariwana Adi Perkasa



Abbreviations Used

a.i	:	Active Ingredient
AMDAL	:	<i>Analisis Mengenai Dampak Lingkungan</i> (Environment Impact Analysis)
APAR	:	<i>Alat Pemadam Api Ringan</i> (light fire extinguisher)
ASA	:	Annual Surveillance Assessment
BAPP	:	<i>Berita Acara Pemeriksaan Pekerjaan</i> (Work Inspection Minutes)
BMP	:	Best Management Practises
BOD	:	Biologycal Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Workers Social Security Agency)
CB	:	Certification Body
COD	:	Chemical Oxygen Demand
CPO	:	Crude Palm Oil
CR	:	Collection Road
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm oil
CSR	:	Corporate Social Responsibility
CWS	:	Central Workshop
EFB	:	Empty Fruit Bunch
EHS	:	Environment Health and Safety
EIA	:	Environmental Impact Assessment
FFB	:	Fresh Fruit Bunch
FGD	:	Focus Group Discussion
FIFO	:	First In First Out
FPIC	:	Free Prior dan Informed Consent
FY	:	For Year
GAP	:	Good Agricultural Practices
GHG	:	Green House Gas
GIS	:	Geographical Information System
GM	:	General Manager
GMO	:	General Manager Office
GPS	:	Global Positioning System
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title)
HR	:	Human Resources
ID	:	Identity
IHT	:	In House Training
IPM	:	Integrated Pest Management
ISO	:	International Organization for Standardization
ISPO	:	Indonesian Sustainable Pam Oil
KER	:	Kernel Extraction Rate
KLHK	:	<i>Kementrian Lingkungan Hidup dan Kehutanan</i> (Ministry of Environment and Forestry)
KPMA	:	<i>Koperasi Plasma Masyarakat Adat</i>
LD	:	Lethal Dosage
LEC	:	Palm oil leaf-eating caterpillars (<i>UPDKS</i>)
LPUP	:	<i>Laporan Perkembangan Usaha Perkebunan</i> (Plantation Business Development Report)
LSU	:	Leaf Sampling Unit
LTA	:	Lost Time Accident
LUCA	:	Land Use Change Analysis
MB	:	Mass Balance

MCU	:	Medical Check Up
MOU	:	Memorandum of Understanding
MR	:	Management Representative
MSDS	:	Material Safety Data Sheet
NCR	:	Non Conformity Report
NGO	:	Non-Government Organisation
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
OHSAS	:	Occupational Health and Safety Assessment Series
P&D	:	Pest and Disease
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> (OHS Committee)
PHL	:	<i>Pekerja Harian Lepas</i> (Daily Worker)
PIC	:	Person In Charge
PJK3	:	<i>Perusahaan Jasa Keselamatan dan Kesehatan Kerja</i> (Occupational Health and Safety Service Company)
PK	:	Palm Kernel
PKE	:	Palm Kernel Expeller
PKO	:	Palm Kernel Oil
PKWT	:	<i>Perjanjian Kerja Waktu Tertentu</i> (Contract Worker)
PM	:	Plantation Manager
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
POP	:	Persistent Organic Pollutant
PPE	:	Personal Protective Equipment
PR	:	Public Relation
PRM	:	Public Relation Manager
RKL-RPL	:	<i>Rencana Pengelolaan Lingkungan - Rencana Pemantauan Lingkungan</i> (Environment Management Plan - Environment Monitoring Plan)
RSPO	:	Roundtable Sustainable Palm Oil
SCCS	:	Supply Chain Certification System
SEIA	:	Social and Environmental Impact Assessment
SIA	:	Social Impact Assessment
SOP	:	Standard Operational Procedure
SPK	:	<i>Surat Perjanjian Kerja</i> (Agreement Letter)
TM	:	<i>Tanaman Menghasilkan</i> (Mature Plant)
TMAT	:	<i>Tinggi Muka Air Tanah</i> (Ground Water Level)
TPH	:	<i>Tempat Pengumpulan Hasil</i> (Place of Collection of Harvesting Results)
WB	:	Weigh Bridge
WHO	:	World Health Organization
WLTK	:	<i>Wajib Laporkan tenaga kerja</i> (labor report)
WTP	:	Water Treatment Plant
WWF	:	World Wildlife Fund
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none">Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020	
1.2	Organisation Information		
1.2.1	Organization name listed in the certificate	PT Nabire Baru – subsidiary of Goodhope Asia Holdings, Ltd.	
1.2.2	Contact person	Donald Ginting	
1.2.3	Organisation address	RSPO registered company: Menara Global, 5 th Floor, Jl. Jend. Gatot Subroto Kav. 27 Jakarta 12950.	
1.2.4	Telephone	+62 2152892260	
1.2.5	Fax	+62 2152892259	
1.2.6	E-mail	donald.ginting@goodhope.co	
1.2.7	Web page address	www.goodhopeasia.com	
1.2.8	Management Representative who completed the application for certification	Donald Ginting	
1.2.9	Registered as RSPO member	1-0175-14-000-00, 02 December 2014	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Nabire Matoa Mill of PT Nabire Baru and its 7 (seven) estate supply bases, as follows: <ul style="list-style-type: none">PT Nabire Baru: Bukit Nuhgojaje Estate, Sungai Wami Estate, Kali Bambu Estate, KPMA Wate Asiaina and KPMA Waoha.PT Sariwana Adi Perkasa: Sungai Sima Estate and KMPA Sarakwari & Koroba There is ext.scope from RACP Area (<i>Satisfactory evaluation result</i>) 2,357.2 ha.	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			LatitudeLongitude
	Nabire Matoa Mill	Village of Wami, District of Yaur, Regency of Nabire, Province of Papua, Indonesia	S 03° 27' 41.40"E 135° 15' 22.84"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			LatitudeLongitude
	Bukit Nuhgojaje Estate (PT Nabire Baru)	Village of Wanggar Pantai, District of Yaur, Regency of Nabire, Province of Papua, Indonesia	S 03° 25' 6.09"E 135° 16' 15.42"
	Sungai Wami Estate	Village of Wami, District of Yaur, Regency of	S 03° 27' 34.17"E 135° 14' 58.27"

	(PT Nabire Baru)	Nabire, Province of Papua, Indonesia								
	Kali Bambu Estate (PT Nabire Baru)	Village of Wami, District of Yaur, Regency of Nabire, Province of Papua, Indonesia	S 03° 24' 45.26"	E 135° 12' 41.27"						
	KPMA Wate Asiaina (PT Nabire Baru, 161 Members)	Village of Wanggar Pantai, District of Yaur, Regency of Nabire, Province of Papua, Indonesia	S 03° 27' 34.17"	E 135° 14' 58.27"						
	KPMA Waoha (PT Nabire Baru, 45 Members)	Village of Wami, District of Yaur, Regency of Nabire, Province of Papua, Indonesia	S 03° 27' 14.03"	E 135° 12' 30.28"						
	Sungai Sima Estate (PT Sariwana Adi Perkasa)	Village of Sima, District of Yaur, Regency of Nabire, Province of Papua, Indonesia	S 03° 23' 45.11"	E 135° 08' 01.22"						
	KPMA Sarakwari & Koroba (PT Sariwana Adi Perkasa, 101 Members)	Village of Sima, District of Yaur, Regency of Nabire, Province of Papua, Indonesia	S 03° 24' 0.917"	E 135° 8' 52.343"						
1.5	Description of Area Statement									
1.5.1	Tenure									
	• State		20,918.85 ha							
	• Community		- ha							
	<i>*PT Nabire Baru and PT Sariwana Adi Perkasa managed area with the total 20,918.85 ha in accordance with legal documents that owned (HGU Certificate) that divided in four own Estate and three fully managed smallholders Estate; however, the scope of certification is 17,808.15 Ha. There is an additional scope related to the RaCP area which was previously completed with the status of Satisfactory evaluation results. The scope of certifications is smaller than total managed its due to 3,110.7 ha excluded form scope of certification (NPP Area).</i>									
1.5.2	Area Statement									
	Description	PT Nabire Baru (Ha)		PT Sariwana Adi Perkasa (Ha)		Total (Ha)				
		Own Estate	Scheme smallholder	Own Estate	Scheme smallholder					
	• Total area	10,897.67	1,474.00	4,621.94	814.54	17,808.15				
	• Mature area	6,158.90	857.10	199.30	338.60	7,553.90				
	• Nursery	58.20	-	-	31.40	89.60				
	• Planting Reserve	204.50	33.30	203.80	73.70	515.30				
	• Infrastructure (Emplacement & Mill)	424.82	73.00	24.46	27.54	549.82				
	• Peatland (HCS)	35.80	108.20	-	23.20	167.20				
	• HCV HCS	4,015.45	402.40	4,194.38	320.10	8,932.33				
1.6	Planting Year and Cycles									
1.6.1	Age profile of planting year									
	Planting Year	Hectarage (ha)								
		Kali Bambu	Sungai Wami	Bukit Nuhgojaje	Plasma - KPMA Wate Asiaina	Plasma - KPMA Waoha	Sungai Sima	Plasma - KPMA Sarakwari & Koroba	Total	
		2012	149.30	434.70	849.0	-	-	-	-	1,433.00
		2013	127.70	394.90	82.2	-	-	-	-	604.80

	2014	850.10	1,612.20	744.9	115.4	115.4	90.6	129.3	3,657.90
	2015	562.70	131.80	131.3	266.2	340.9	108.7	209.3	1,750.90
	2016	76.40	-	-	12.2	-	-	-	88.60
	2017	5.00	6.70	-	-	7.0	-	-	18.70
	Sub Total Mature	1,771.20	2,580.30	1,807.40	393.80	463.30	199.30	338.60	7,553.90
	TOTAL	1,771.20	2,580.30	1,807.40	393.80	463.30	199.30	338.60	7,553.90
1.6.2	New Planting area after January 2010				7,553.90 ha				
1.6.3	Planting Cycle				1 st Cycle				
1.7	Description of Mill and Supply Base								
1.7.1	Description of Mill								
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel			
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)		
	Nabire Matoa Mill	45	139,318.36	32,244.40	23.14	4,249.49	3.05		
*Production data source from October 2021 to September 2022									
1.7.2	Description of Certification Scope of Supply Base								
	Name of Estate	Total Area (ha)	Production Area (ha)	FFB (tonnes/year)	Yield (tonnes/ha /year)	Supplied to Mill			
						FFB (tonnes/year)	%		
	Bukit Nuhgojaje Estate (PT Nabire Baru)	1,769.69	1,361.70	16,671.56	12.24	16,671.56	100		
	Sungai Wami Estate (PT Nabire Baru)	3,956.40	1,406.90	16,754.32	11.91	16,754.32	100		
	Kali Bambu Estate (PT Nabire Baru)	3,242.38	1,699.00	21,631.12	12.73	21,631.12	100		
	KPMA Wate Asiaina (PT Nabire Baru, 161 Members)	433.92	275.20	1,880.26	6.83	1,880.26	100		
	KPMA Waoha (PT Nabire Baru, 45 Members)	718.78	444.50	4,083.79	9.19	4,083.79	100		
	Sungai Sima Estate (PT Sariwana Adi Perkasa)	4,582.54	198.50	1,991.20	10.03	1,991.20	100		
	KPMA Sarakwari & Koroba (PT Sariwana Adi Perkasa, 101 Members)	747.24	309.90	2,635.28	8.50	2,635.28	100		
	TOTAL	15,450.95	5,695.70	65,647.53	11.53	65,647.53	100		
*Production data source from February to September 2022									
1.7.3	FFB description from other source								
	Name of sources/Organisation	Type of Organisation	Number Of Smallholders	Production Area (ha)	Supplied to Mill				
					FFB (tonnes/year)				
	Bukit Nuhgojaje Estate (Non-certified)	Under Management of Goodhope	-	72.2	16,839.20				

Sungai Wami Estate (Non-certified)	Under Management of Goodhope	-	1,173.4	30,625.63
Kali Bambu Estate (Non-certified)	Under Management of Goodhope	-	445.7	16,217.73
KPMA Wate Asiaina (Non-certified)	Under Management of Goodhope	-	118.6	3,198.84
KPMA Waoha (Non-certified)	Under Management of Goodhope	-	18.8	3,177.34
Sungai Sima Estate (Non-certified)	Under Management of Goodhope	-	0.8	1,369.31
KPMA Sarakwari & Koroba (Non-certified)	Under Management of Goodhope	-	28.7	2,242.85
TOTAL				73,670.89

**Production data source from October 2021 to September 2022*

***All FFB from other source are noncertified product from blocks or estate that excluded from scope of certification*

1.7.4	Product categories	FFB, CPO, PK
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1.8 Tonnage of Product

1.8.1	Past Annual Claim Certified Product	Last Year Projected Certified Volume (MT)	Last Year Actual Certified Volume (February to September 2022) (MT)
	FFB Processed	110,000	65,647
	CPO Production	25,000	15,114
	Palm Kernel (PK) Production	3,300	1,996

1.8.2	Product selling	Actual selling product for last year (MT)
	Type of selling product	
	CSPO sold as RSPO certified product	-
	CSPK sold as RSPO certified product	-
	CSPO sold under other scheme	-
	CSPK sold under other scheme	-
	CSPO sold as conventional	-
	CSPK sold as conventional	-

**There's no product selling as certified product due to sanction*

1.8.3 Estimate of Certified FFB Claim

Name of Estates	Total Area (ha)	Production Area (ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)
Bukit Nuhgojaje Estate (PT Nabire Baru)	2,255.49	1,807.40	40,000	22.13
Sungai Wami Estate (PT Nabire Baru)	5,240.90	2,580.30	28,500	11.05
Kali Bambu Estate (PT Nabire Baru)	3,401.28	1,771.20	22,500	12.70
KPMA Wate Asiaina (PT Nabire Baru, 161 Members)	707.72	393.80	3,500	8.89
KPMA Waoha (PT Nabire Baru, 45 Members)	766.28	463.30	7,500	16.19

	Sungai Sima Estate (PT Sariwana Adi Perkasa)		4,621.94	199.30	4,000	20.07				
	KPMA Sarakwari & Koroba (PT Sariwana Adi Perkasa, 101 Members)		814.54	338.60	6,000	17.72				
	TOTAL		17,808.15	7,553.90	112,000	14.83				
*Projected FFB production for 12 months of certificate										
1.8.4	Estimate of Certified Palm Product Claim									
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO Out put (tonnes)		Extraction (%)	Palm Kernel Out put (tonnes)		Extraction (%)	Supply Chain Module
	Nabire Matoa	45	112,000	26,000		23.30	3,400		3.05	
	*Projected CSPO & CSPK production for 12 months of certificate									
1.9	Other Certifications									
	Others			PT Nabire Baru: ISPO Certificate No. MUTU-ISPO/257 dated 17 November 2021 PT Sariwana Adi Perkasa: ISPO Certificate No. MUTU-ISPO/258 dated 25 November 2021						
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								
	Terawan Mill (PT Agro Indomas)	2012	Terawan Estate	2012	Danau Sembuluh Sub District, Seruyan District, Kalimantan Tengah Province	Certified				
			Teluk Ulin Estate	2012						
			Lampasa Estate	2012						
			Lampasa Plasma	2012						
			Rim Capital Estate (PT Rim Capital)	2015	Hanau and Danau Sembuluh Sub District, Kotawaringin Timur District, Kalimantan Tengah Province	Certified				
	Sungai Purun Mill (PT Agro Indomas)	2012	Sungai Rungau Estate	2012	Danau Sembuluh Sub District, Seruyan District, Kalimantan Tengah Province	Certified				
			Sungai Purun Estate	2012						
			Terawan Plasma	2012						
			Bengkal Plasma	2012						
	Sungai Binti Mill (PT Agro Bukit)	2015	Sungai Binti Estate	2015	Mentaya Hilir Utara Sub District, Kotawaringin Timur District, Kalimantan Tengah Province	Certified				
			Sawah Estate	2015						
			Sungai Lenggana Estate	2015						

		Tanah Putih Estate	2015		
		PT Agro Bukit (499.3 Ha)	2022	Mentaya Hilir Utara Sub District, Kotawaringin Timur District, Kalimantan Tengah Province	Remediation Plan
Bukit Santuai Mill (PT Agro Wana Lestari)	2015	Penyahuan Estate	2015	Mentaya Hulu and Bukit Sentuai Sub District, Kotawaringin Timur District, Kalimantan Tengah Province	Certified
		Tanah Haluan Estate	2015		
		Keminting Estate	2015		
		Sangai Estate	2015		
		Tewehara Estate	2022	Mentaya Hulu and Bukit Sentuai Sub District, Kotawaringin Timur District, Kalimantan Tengah Province	Waiting for Land Title Permit (HGU)
		Purang Estate (PT Karya Makmur Sejahtera)	2022		
Bumi Jaya Mill (PT Agro Indomas)	2020	Sepaku Estate (PT Agro Indomas)	2022	Sepaku Sub District, Penajam Paser Utara District, Kalimantan Timur Province	Waiting for Land Title Permit (HGU)
-	-	Agro Bakti Estate (PT Agra Jaya Baktitama)	2022	Ketapang District, Kalimantan Barat Province	Mill is not constructed yet.
		Agro Jaya estate (PT Agra Jaya Baktitama)	2022		
-	-	Prima Khatulistiwa Estate (PT Sumber Hasil Prima)	2022	Sintang District, Kalimantan Barat Province	Mill is not constructed yet.
		Prima Sejahtera Estate (PT Sumber Hasil Prima)	2022		
-	-	Agro Sejahtera Estate (PT Batu Mas Sejahtera)	2022	Ketapang District, Kalimantan Barat Province	Mill is not constructed yet.
-	-	Sinar Jaya Estate (PT Sinar Sawit Andalan)	2022	Sintang District, Kalimantan Barat Province	Mill is not constructed yet
		Sinar Lestari Estate, (PT Sinar Sawit Andalan)	2022		
		Sinar Makmur Estate (PT Sinar Sawit Andalan)	2022		
		Agro Lestari Estate (PT Sawit Makmur Sejahtera)	2022	Ketapang District, Kalimantan Barat Province	Mill is not constructed yet.

	-	-	Agro Makmur Estate (PT Sawit Makmur Sejahtera)	2022		
	Nabire Matoa Mill (PT Nabire Baru)	2021	Bukit Nuhgogage Estate (PT Nabire Baru)	2021	District of Nabire, Province Papua Barat	Certified
			Bukit Nuhgogage Estate Non HGU Area (25.5 ha) (PT Nabire Baru)	2022		On HGU Process
			Bukit Nuhgojaje Estate RACP Area (72.2 Ha) (PT Nabire Baru)	2023		Initial Assessment on 2022
			Sungai Wami estate (PT Nabire Baru)	2021		Certified
			Sungai Wami estate RACP Area (1173.4 Ha) (PT Nabire Baru)	2023		Initial Assessment on 2022
			Kali Bambu Estate (PT Nabire Baru)	2021		Certified
			Kali Bambu Estate RACP Area (445.7) (PT Nabire Baru)	2023		Initial Assessment on 2022
			KPMA Waoha RACP Area (18.8 ha) (PT Nabire Baru)	2023		Initial Assessment on 2022
			KPMA Wate Asiaina RACP Area (118.6 ha) (PT Nabire Baru)	2023		Initial Assessment on 2022
			Sungai Sima Estate RACP Area (0.8 Ha) (PT Sariwana Adi Perkasa)	2023		Initial Assessment on 2022
			Sungai Sima Estate (PT Sariwana Adi Perkasa)	2021		Certified
			Sungai Sima Estate Non HGU Area (0.2 ha) (PT Sariwana Adi Perkasa)	2022		On HGU Process
			KPMA Sarakwari & Koroba RACP Area (28.7 Ha) (PT Sariwana Adi Perkasa)	2023		Initial Assessment on 2022
	-	-	Plasma Scheme Smallholder	2023	All location of Goodhope Plantation	--
	<i>*TBP updated September 2022 and signed by Director of Sustainability</i>					
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard					

	The company have agreement with smallholders namely KPMA Sarakwari and Koroba, KPMA Waoha and KPMA Wate Asiaina. During this initial certification also involved all scheme smallholders, however due to NPP Process there are several area of scheme smallholders excluded from scope of certifications with the total excluded area covering 1,923 Ha
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2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1	<p>1. Briyogi Shadiwa (Lead Auditor). Indonesian citizens. Associate Degree of Oil Palm Plantation, Bogor Agricultural University. He has work experience since 2009 in several private oil palm plantation companies in Indonesia as Assistant Agronomy and Agronomy Quality Control. The trainings that have been attended include: RSPO Lead Auditor Course by Checkmark, ISPO Auditor Training by LPP, Lead Auditor ISO 9001: 2015, RSPO Supply Chain Certification Training Course by Checkmark, Lead Auditor ISO 14001: 2015, SMK3 Awareness, OHSAS 18001 Awareness: 2007, SA 8000 Awareness, ISO 45001: 2018 Awareness and General OHS Expert Training. During this assessment, he verified the Legal, BMP, OHS and SCCS aspect.</p> <p>2. Rindu Galih Rezza Rachmansyah (Auditor) Indonesian citizen, Bachelor of Agriculture with major in Plant Pest and Disease. Has one year experience as Field Expert in Pesticide Company and 3 years' experience in Industrial Forest Management, Forest Rehabilitation and Reclamation on Indonesia Stated Owned Company as Assistant. Training which had attended including Lead Auditor ISO 9001, ISO 14001, ISO 17021, ISO 19011, SA 8000, Lead Auditor ISPO, Lead Auditor RSPO, RaCP & NPP Awareness and OHSAS 18001:2007. Has involved in several audit activities related to sustainable palm oil since 2017 in the aspects of Best Management Practices (BMP), social, worker welfare and OHS. During this assessment, he verified worker welfare and transparency aspects.</p> <p>3. Erika Lucitawati (Auditor). Indonesian citizen. Bachelor of Engineering with major in Environmental Engineering. The trainings that have been attended include ISPO Lead Auditor Training, RSPO Lead Auditor Training, Awareness SA8000, In House Training of ISO 19011: 2018, ISO 17021: 2015, ISO 17065: 2012, ISO 9001: 2015, ISO 14001: 2015, ISO 45001: 2018, and The Supervision of Occupational Health and Safety Training. During this assessment, she verified environmental, GHG, and conservation aspects.</p> <p>4. Sabiah Dhiningtyas Utami (Auditor Trainee). Indonesian Citizen. Bachelor of Agriculture, Department of Agrotechnology, Padjadjaran University. Has attended training on <i>Awareness</i> ISO 9001:2015, <i>Awareness</i> ISO 19011:2018, <i>Awareness</i> ISO 14001:2015, <i>Awareness</i> ISO 45001:2018, <i>Awareness</i> ISO 17021:2015, <i>Awareness</i> ISO 17065:2012 dan <i>Awareness</i> RSPO. She has participated in several simulations of audit activities related to the certification system for sustainable palm oil plantations with labor and social aspects. During this audit, he was assigned to verify BMP and OHS aspect under supervision by the Lead Auditor.</p> <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1	<p>Number of auditors: 3 auditors and 1 auditor trainee</p> <p>Number of days for ASA-1 Onsite Audit: 8 days</p> <p>Number of working days for ASA-1 Onsite Audit: 24 Working days</p>
2.2.2	Assessment Process
ASA-1	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the Nabire Matoa Mill – PT Nabire Baru (Goodhope Asia Holdings Ltd) 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, 12 November 2020.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Some opportunities for improvement of the results RC delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA-2.</p> <p>Improvement of findings from IA findings were observed by auditors at this ASA-1 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.</p>

The opening meeting was held on 17 October 2022. As for the participants who attended the opening meeting included the General Manager, Estate and Mill Managers, Support Team from Jakarta and other staff. Closing meeting was held on 25 October, 2022 attended by the same participants as the opening meeting. The management accept all the onsite ASA-1 audit results.

The assessment program please find Appendix 2.

2.2.3
Locations of Assessment
ASA-1

The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:

Nabire Matoa Mill

- **Grading.** Observations and interviews with 2 workers related to OHS, work processes and worker welfare.
- **Loading Ramp.** Observations and interviews with 1 worker related to OHS, work processes and worker welfare.
- **St. Sterilizer.** Observations and interviews with 1 worker related to OHS, work processes and worker welfare.
- **St. Press.** Observations and interviews with 1 worker related to OHS, work processes, housekeeping, and worker welfare.
- **St. Kernel.** Observations and interviews with 1 worker related to OHS, work processes, housekeeping, and worker welfare.
- **St. Boiler.** Observations and interviews with 1 worker related to OHS, work processes, housekeeping, and worker welfare.
- **St. Clarification.** Observations and interviews with 1 worker related to OHS, work processes, housekeeping, and worker welfare.
- **Engine room.** Observations and interviews with 1 worker related to OHS, work processes, housekeeping, and worker welfare.
- **Dispatch CPO.** Observations related to related to OHS, work processes and housekeeping.
- **Water Treatment Plant.** Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.
- **WWTP.** Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.
- **Solid Waste Area (Empty Bunch, Shell, and Fiber).** Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.
- **Housing Complex.** Observation and interview related to house condition, public facility, OHS aspect, and waste management.
- **Day-care.** Observation and interview related to day-care condition, public facility, OHS aspect, and waste management.
- **Pos Security.** Observations and interviews related to work procedures, employment systems, OSH, environmental aspects and complaint mechanisms.
- **Weighbridge Station.** Observations and interviews related to work procedures, employment systems, OSH, environmental aspects and complaint mechanisms.
- **Mill Laboratory.** Observations and interviews related to work procedures, employment systems, OSH, environmental aspects and complaint mechanisms.
- **Hazardous Waste Temporary Storage (Satellite).** Observations and interviews related to work procedures, employment systems, OSH, environmental aspects and complaint mechanisms.
- **Chemical Storage.** Observations and interviews related to work procedures, employment systems, OSH, environmental aspects and complaint mechanisms.
- **Spare Part / Central Storage.** Observations and interviews related to work procedures, employment systems, OSH, environmental aspects and complaint mechanisms.
- **Oil Storage.** Observations and interviews related to work procedures, employment systems, OSH, environmental aspects and complaint mechanisms.
- **Solar Tank.** Observations related to environmental management and emergency response.

- **Mill Workshop.** Observations and interviews related to work procedures, employment systems, OSH, environmental aspects and complaint mechanisms.
- **Water Treatment Plant (WTP).** Observations and interviews related to work procedures, employment systems, OSH, environmental aspects and complaint mechanisms.
- **Hydrant No. 09 Simulation.** Observations related to readiness, preparedness and emergency response systems.

Bukit Nuhgojaje Estate

- **HGU Pole No. 144 and 145.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HCV Block N21.** Observation the implementation of management in HCV of Sago Vegetation, food reserves and traditional ceremony needs.
- **Harvest, Blocks L12 and L13, Division 3.** Observations and interviews related to technical work according to procedures, K3, employment, environmental and social aspects.
- **Pick Up Loose Fruits, Blocks L12 and L13, Division 3.** Observations and interviews related to technical work according to procedures, K3, employment, environmental and social aspects.
- **Transport FFB, Block M25, Division 1.** Observations and interviews related to technical work according to procedures, K3, employment, environmental and social aspects.
- **Spray, (transferred to pick-up loose fruits jobs).** Observations and interviews related to technical work according to procedures, OHS, employment, environmental and social aspects.
- **Piezometer, Block M14, Division 2.** Observation related to water and peat management.
- **Slope area, Block M23, Division 1.** Observation related to soil conservation management.
- **Fire Tower, Block M26, Division 1.** Observations related to fire emergency response conditions.
- **Barn Owl Box, Division N16.** Observations related to the use of owls as IPM
- **Beneficial Plant.** Observations related to the maintenance of beneficial plants (*Turnera, Cassia, and Antigonon*)
- **Fertilizer Storage.** Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.
- **Pesticide Storage.** Observation related to implementation of procedure, OHS aspect, and waste management.
- **Material Storage.** Observation related to implementation of procedure, OHS aspect, and waste management.
- **Rinse House.** Observation related to implementation of procedure, OHS aspect, and waste management.
- **Genset Building.** Observation related to implementation of procedure, OHS aspect, and waste management.
- **Housing Complex.** Observation and interview related to house condition, public facility, OHS aspect, and waste management.
- **Day-care.** Observation and interview related to day-care condition, public facility, OHS aspect, and waste management.
- **Landfill Block N19 Division 3.** Observation and interview related to landfill condition, OHS aspect, and waste management.

KPMA Wate Asaiaina

- **HGU Pole No. 126.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HCV Block M8.** Observation the implementation of management in HCV of Sago Vegetation, food reserves and traditional ceremony needs
- **Harvest, Blocks N15.** Observations and interviews related to technical work according to procedures, K3, employment, environmental and social aspects.

Sungai Wami Estate

- **HGU Pole No. G07, S69, S67, S66.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **Harvest, Blocks I20, Division 3.** Observations and interviews related to technical work according to procedures, K3, employment, environmental and social aspects.
- **Pick Up Loose Fruits, Blocks J11 and J20, Division 3 and 4.** Observations and interviews related to technical

work according to procedures, K3, employment, environmental and social aspects.

- **Transport FFB, Block J30, Division 2.** Observations and interviews related to technical work according to procedures, K3, employment, environmental and social aspects.
- **Spray, (transferred to pick-up loose fruits jobs). Block K13, Division 2.** Observations and interviews related to technical work according to procedures, K3, employment, environmental and social aspects.
- **Piezometer, Block K19, Division 3.** Observation related to water and peat management.
- **Subsidence Pole, Blok K19, Divisi 3.** Observation related to water and peat management.
- **Barn Owl Box, Division J16, Division 3.** Observations related to the use of owls as IPM
- **Beneficial Plant, Block J29, Division 1.** Observations related to the maintenance of beneficial plants (*Turnera, Cassia, and Antigonon*)
- **Fertilizer Storage.** Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.
- **Pesticide Storage.** Observation related to implementation of procedure, OHS aspect, and waste management.
- **Material Storage.** Observation related to implementation of procedure, OHS aspect, and waste management.
- **Rinse House.** Observation related to implementation of procedure, OHS aspect, and waste management.
- **Clinic.** Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.
- **Fuel Tank.** Observation related to implementation of procedure, OHS aspect, and waste management.
- **Fire Preparedness Utility Storage.** Observation related to implementation of procedure, OHS aspect, and waste management.
- **Central Workshop.** Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.
- **Hazardous and Toxic Waste Storage.** Observation related to implementation of procedure, OHS, and waste management aspects.
- **Housing Complex.** Observation and interview related to house condition, public facility, OHS aspect, and waste management.
- **Day-care.** Observation and interview related to day-care condition, public facility, OHS aspect, and waste management.
- **Landfill Block J31 Division 1.** Observation and interview related to landfill condition, OHS aspect, and waste management.
- **Land Application Block K24 Division 2.** Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.

Kali Bambu Estate

- **HGU Pole No. S40.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HCV Block M8.** Observation the implementation of management in HCV of Sago Vegetation, food reserves and traditional ceremony needs.
- **Harvest, Blocks B29 and B30.** Observations and interviews related to technical work according to procedures, K3, employment, environmental and social aspects.
- **Pick Up Loose Fruits, Blocks B29 and B30.** Observations and interviews related to technical work according to procedures, K3, employment, environmental and social aspects.
- **Piezometer, Block F17.** Observation related to water and peat management.
- **Slope area, Block B31.** Observation related to soil conservation management.
- **Beneficial Plant, Block C30.** Observations related to the maintenance of beneficial plants (*Turnera, Cassia, and Antigonon*).
- **Fertilizer Storage.** Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.
- **Pesticide Storage.** Observation related to implementation of procedure, OHS aspect, and waste management.
- **Material Storage.** Observation related to implementation of procedure, OHS aspect, and waste management.
- **Rinse House.** Observation related to implementation of procedure, OHS aspect, and waste management.

- **Fuel Tank.** Observation related to implementation of procedure, OHS aspect, and waste management.
- **Mini Workshop.** Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.
- **Housing Complex.** Observation and interview related to house condition, public facility, OHS aspect, and waste management.
- **Daycare.** Observation and interview related to day-care condition, public facility, OHS aspect, and waste management.
- **Landfill Block B29 Division 3.** Observation and interview related to landfill condition, OHS aspect, and waste management.

KPMA Suku Waoha

- **Harvest, Blocks F19.** Observations and interviews related to technical work according to procedures, K3, employment, environmental and social aspects.
- **Pick Up Loose Fruits, Blocks F19.** Observations and interviews related to technical work according to procedures, K3, employment, environmental and social aspects.

Sungai Sima Estate

- **HGU Pole No. 082, 162 and 163.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HCV Block M8.** Observation the implementation of management in HCV of Sago Vegetation, food reserves and traditional ceremony needs.
- **Harvest, Blocks G21.** Observations and interviews related to technical work according to procedures, K3, employment, environmental and social aspects.
- **Pick Up Loose Fruits, Blocks G21.** Observations and interviews related to technical work according to procedures, K3, employment, environmental and social aspects.
- **Pruning, Block G21.** Observations and interviews related to technical work according to procedures, K3, employment, environmental and social aspects.
- **Slope area, Block H25.** Observation related to soil conservation management
- **Fire Tower, Block G24.** Observations related to fire emergency response conditions.
- **Barn Owl Box, Block G23.** Observations related to the use of owls as IPM
- **Beneficial Plant, Block G21 – G23.** Observations related to the maintenance of beneficial plants (*Turnera, Cassia, and Antigonon*)
- **Fertilizer Storage.** Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.
- **Pesticide Storage.** Observation related to implementation of procedure, OHS aspect, and waste management.
- **Rinse House.** Observation related to implementation of procedure, OHS aspect, and waste management.
- **Housing Complex.** Observation and interview related to house condition, public facility, OHS aspect, and waste management.
- **Landfill Block I24.** Observation and interview related to landfill condition, OHS aspect, and waste management.

KPMA Sakrawari and Karoba

- **Harvest, Blocks J20.** Observations and interviews related to technical work according to procedures, K3, employment, environmental and social aspects.
- **Pick Up Loose Fruits, Blocks J20.** Observations and interviews related to technical work according to procedures, K3, employment, environmental and social aspects.
- **Pruning, Block J20.** Observations and interviews related to technical work according to procedures, K3, employment, environmental and social aspects.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1	Summary of stakeholder consultation process

<p>Consultation of stakeholders for Nabire Matoa POM was held by:</p> <ul style="list-style-type: none"> • Public Notification on October 10th, 2022. • Public consultation meeting with government institution of Nabire Regency on October 19th, 2022. • Public consultation meeting with communities including previous land owner on October 19th, 2022. • Public consultation meeting with internal stakeholders and contractor on October 19th, 2022. • Consultation with NGO (WWF, WALHI, Sawit Watch and AMAN) on October 10th, 2022. <p>Numbers of input from stakeholders were clarified by certificate holder.</p>	
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (ASA-2) will be conducted eight (9) months to twelve (12) months after license approved.

3.0. ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has assessed Nabire Matoa Mill – PT Nabire Baru, subsidiary of Goodhope Asia Holdings, Ltd. operation consisting of one (1) mill and seven (7) oil palm estates.

During the assessment, there were no nonconformities were assigned and 1 opportunity for improvement were identified.

MUTUAGUNG LESTARI found that Nabire Matoa Mill – PT Nabire Baru, subsidiary of Goodhope Asia Holdings, 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, 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				
Unit of certification has list of publicly available information as ratified by the Director of Sustainability on January 01, 2020 includes: licensing documents, OHS plans, environmental impact plans and assessments, pollution prevention and reduction plans, details of complaints and complaints, negotiation procedures, sustainable improvement plans, reports audits, company sustainability policies, etc. some documents that are confidential in nature need to be approved by the General Manager and/or Chief Operational Officer (COO).				
Procedures related to the information delivery system are presented in document no. IMS.P-05 (Rev. 04) dated 04 May 2015 regarding communication, participation and consultation. The procedure explains that complaints can be submitted formally or informally and are recorded in the “Book of Communication and Request for Information”. Any incoming information will be submitted to the relevant company and will be responded to a maximum of 14 days from the request for information report.				
1.1.2				
Unit of certification has also mandatory report of environmental, manpower, legality and other aspects to the government agency which are available in Bahasa and in accordance with applicable regulations. Unit of certification has shown examples of receipt of mandatory report to government agency which has been summarized in the following table:				
No	Mandatory Report	Relevant Agency	Date	
1	Hazardous Waste Management Report of Second Quarter 2022 PT NB and PT SAP	Environmental Agency of Nabire Regency	6 July 2022	
		Environmental Agency of Papua Province		
		Ministry of Environmental and Forestry		
			PT NB : 1666360110-9837 PT SAP : 1666360431-9838	
2	Hazardous Waste Management Report Third Quarter 2022 PT NB and PT SAP	Environmental Agency of Nabire Regency	11 October 2022	
		Environmental Agency of Papua Province		

Ministry of Environmental and Forestry			PT NB : 1666016387-9837 PT SAP : 1666016864-9838
3	Report on Implementation of Management and Monitoring Plan (RKL-RPL) of Second Semester 2021 PT NB and PT SAP	Environmental Agency of Nabire Regency Environmental Agency of Papua Province Poultry Agency of Nabire Regency	21 March 2022
4	Report on Implementation of Management and Monitoring Plan (RKL-RPL) of First Semester 2022 PT NB and PT SAP	Environmental Agency of Nabire Regency Environmental Agency of Papua Province Poultry Agency of Nabire Regency	21 March 2022
5	Report of Quarter 1 P2K3 (January – March period) 2022	Manpower and Transmigration Office of Nabire Regency	7 April 2022
6	Report of Quarter 2 P2K3 (April – June period) 2022	Manpower and Transmigration Office of Nabire Regency	6 July 2022
7	Report of Quarter 3 P2K3 (July – September period) 2022	Manpower and Transmigration Office of Nabire Regency	17 October 2022
8	Report of Manpower 2022	Manpower and Transmigration Office of Nabire Regency	06 May 2022

Based on the description above, it can be concluded that the company has routinely reported mandatory reports which are the provision of information to stakeholders on a regular basis in accordance with the timeframe. This is also reinforced by the results of interviews with representatives from Agencies in Nabire Regency who stated that the unit of certification routinely reports all required information according to the time frame.

1.1.3

From document review of Book of Communication and Request for Information of 2021-2022, there was no request for information from the stakeholders, so there was no response. Based on interview with representatives of stakeholders, it was known that they had not requested information from the company. It is known that letters from external parties only contain letters related to requests for funding assistance and transportation units during 2021, such as:

- Letter No. "Istimewa" on 20 January 2022 from *Suku Besar Yerisiam Gua Sub Suku Waoha* in Kampung Sima regarding to request for assistance of excavator and truck for development of Kampung Bumiowi. This has been responded by unit of certification on 29 January 2022 in form of excavator and truck assistance in Kampung Bumiowi.
- Letter No. 02/SA/II/2022 on 4 February 2022 from KPMA Suku Akaba regarding to asking for acceleration of development in KPMA Suku Akaba. This has been responded by unit of certification on 8 February 2022 in form of focus group discussion with KPMA Suku Akaba representatives.
- Letter No. 004/PPHUT.77/YAUR/VII/2022 on 12 August 2022 from *Panitia Peringatan HUT RI Ke-77 Tahun* of Yaur District regarding to fund for Indonesia Independence Day occasion. This has been responded by unit of certification on 26 August 2022.

1.1.4

Records of requests for information from internal and external stakeholders along with their responses are presented in Book of Communication and Request for Information of 2021-2022, which informs, among other things, the record number, date of entry of requests for information (including those related to complaints, suggestions, requests for donations), address information requester, recipient, description of communication, source of communication (internal or external), type of communication, description of response/response, date of response, as well as information regarding other records. The consultation procedure has been explained to all relevant stakeholders by the appointed management representative which was carried out in the socialization activity regarding

the consultation procedure 21 June 2021, involving representatives of nearest tribes on operation area. This has been in accordance with interview result with local government, village representatives, labor union and gender committee which shown that they had a good understanding of communication and consultation procedures.

1.1.5

Unit of certification shows a list of stakeholders as of 30 September 2022, updated by the CSR Assistant, which consists of 25 representatives of government institutions, 2 indigenous people institutions, 4 sub indigenous people representatives, 1 polyclinic, 4 cooperatives of indigenous peoples, suppliers, and contractors, as well as internal stakeholders consisting of representatives from bipartite, gender committees and NGO (such as, Awas Mife, Forest People, *Yayasan Pusaka*, Aid environment, Greenpeace and Sawit Watch). The address and contact number of each stakeholder representative is available. Based on sampling for interviews with stakeholders referring to the stakeholder list document, it can be concluded that all contacts listed in the document are still active and in accordance with the data provided.

Status: Comply

1.2

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

1.2.1

The company's ethical behavior policy is contained in document no. GAHL.SO.SUS.01 (Rev. 01) dated May 25, 2020 on sustainable policy, which includes, among others: compliance with oil palm sustainability standards, respect for human rights, ethical behavior and fair conditions, community welfare, support from independent smallholders, etc. the procedure belong to Goodhope as a parent company and it apply to both company (PT Nabire Baru and PT Sariwana Adi Perkasa). The company shows evidence of socializing the vision and mission, sustainability policy and company code of ethics to stakeholders (contractors and surrounding communities) on 03 August 2022, and to company employees on 02 Juni 2022.

The company can show evidence that ethical policies have been included in the contract, for example in the Employment Agreement related to CPO Transport Work between PT Nabire Baru and CV Mitra Lintas Borneo No. PTNB/C/221.1 dated March 22, 2019, the term of the agreement is from November 1, 2018, to October 31, 2025.

This policy covers all operational activities of companies, including the prohibition of corruption, bribery and fraud in the use of funds and resources as well as compliance with reasonable business practices. Based on the results of interviews with workers in the sampling units such as in the mill and estate who stated that all of them had received socialization related to the company's code of ethics which includes prohibition of corruption, bribery and fraud in the use of funds and resources and adherence to reasonable business practices in all operational areas. The worker explained that it is not permissible to take actions that violate the company's code of ethics, for example committing crimes, gambling, domestic violence, bribery and so on. The company has socialized the company code of ethics policy to all employees.

Based on the explanation above, it can be concluded that the certification unit has committed to act ethically in all business operations and transactions in accordance with the code of ethics policy that has been approved by the company.

1.2.2

The company has a system for monitoring compliance and implementation of the policy, as well as overall ethical business practices. Based on the results of the 2021-2022 (September) complaints document review, it was concluded that there were no reports related to violations of ethical business practices. The company also routinely conducts financial audits carried out by external audits or public accountant audits. The company has a financial report of PT Nabire Baru and PT Sariwana Adi Perkasa on 31 March 2022 from Public Accountant Firms. the results of the report note that the financial statements are fairly presented, in all material respects, the financial position and financial performance and cash flows for the year ended on that date, in accordance with Indonesian Financial Accounting Standards.

In addition, there is a Whistle Blowing system that establishes the flow of complaints/reports of violations in all employees, without worrying, are willing to convey the possibility of fraudulent practices occurring within the certification unit. Based on the results of interviews with workers in the sampling units such as who stated that all of them was aware of Whistle Blowing system that has been implemented and can be accessed by all workers, including contract workers. In addition, there are statements from third parties in collaboration with the certification unit, namely that they have been given socialization related to the code of ethics and the Whistle Blowing System before ratifying the cooperation agreement. This is done to ensure that before collaborating with the certification unit,

his party does not commit a violation or can report a violation when a certification unit commits a violation during the collaboration.

During the past year there have been no reports related to violations committed by internal/external parties and this is evidenced by the results of a document review related to reporting documentation for the Whistle Blowing System.

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

Based on documents verifications the unit of certification can demonstrate compliance with these law and regulations, for instance:

Environmental aspect

- Has been implements the requirement of environment aspect such as EIA management and monitoring in routinely.
- Has been manage the hazardous waste, POME and domestic waste in accordance with applicable regulation.
- Land preparation without burning and has the infrastructure in fire anticipation, according to *Permentan* Number. 26 of 2007 section 15.

Employment Aspect

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

- Manpower Mandatory Report for PT Nabire Baru – Plantation that has been reported on 06 May 2022 with an obligation to report back on 06 May 2023.
- Manpower Mandatory Report for PT Nabire Baru – Mill that has been reported on 06 May 2022 with an obligation to report back on 06 May 2023.
- Manpower Mandatory Report for PT Sariwana Adi Perkasa that has been reported on 06 May 2022 with an obligation to report back on 06 May 2023.
- The implementation of the minimum wage in 2022 is in accordance with the Minimum Wage Decree of the in Papua Province established by the Governor of Papua in 19 November 2021.
- Payment of overtime wages to workers in accordance with Government Regulation No. 36 in 2021.
- Implementation of the structure and scale of wages for all levels of workers in accordance with Minister of Manpower Regulation No. 01 of 2017.

OHS Aspect

- Has provided PPE for all employees in accordance with the risk analysis and is provided for Free
- Involve employees in health insurance and employment insurance programs (*BPJS TK and BPJS Kesehatan*)
- Equipping operators with required competencies, for example license for lift operators and power plant operators

BMP aspect

In terms of best management practices, it is known that plantation and mill management has implemented several compliances with Indonesian laws and regulations, for example not using the burning method in the land clearing process, trees planted are from seed producers (DxP) which are recognized by the Indonesian government. Each unit of the Unit of Certification has implemented integrated pest management, biological control and only uses pesticides that are listed on the pesticide government website.

Legal Aspect

The unit of certification can demonstrate compliance with these laws and regulations, for example: have environmental documents, Have plantation business permits and etc.

2.1.2

Procedure of legal requirement is listed in document SOP EHS Legal and Other Requirements No. IMS.P-02 dated 04 Mei 2015. The procedure explains the person in charge for managing the regulation and update the regulation. EHS team will update the regulation whenever there is new regulation related to company activity, at least once a year. The latest evaluation has been done by company on 1 April 2022, which included latest regulation such as: Government Regulation No. 6/2021, Government Regulation No. 10/2021

and Government Regulation No. 22/2021.

Regarding monitoring of legal compliance for third parties, in each work agreement between the certification unit and the third parties, there are several separate clauses related to fulfilling legal obligations in force in Indonesia as one of the obligations that must be fulfilled by the third parties. To ensure compliance above with these clauses, the certification unit always requests the requirements for completeness before the contractor does / starts work. This is inline with statements on indicators 2.2.1 and 2.2.2.

2.1.3

The company has procedures for monitoring and maintaining the HGU stake contained in Land Boundary Document (Doc. No. GPS 1.1, Date 16 July 2016). The procedure informs technical monitoring and maintenance of estate boundary markings. The person in charge of monitoring is carried out by the GPS Assistant every month.

The company has a map that showing the location of the boundary poles in each estate. The company has also monitored HGU boundary pole in April 2022 by showing the results of monitoring, in accordance with the Procedure. The results of field observations on the boundary pole for example No. 145 and 144 in Bukit Nahgojaje Estate and No. 126 in KPMA Wate Asiaina, No. G07, S69, S67, S66 in Sungai Wami Estate, No. S40 in Kali Bambu Estate and Pole No. 082, 162 and 163 in Sungai Sima Estate are found and that the condition of the boundary poles are well maintained.

Status: Comply

2.2

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

2.2.1

In monitoring the use of third parties (contractors, FFB suppliers and transporters) for plantation and mill activities, the certification unit has well documented the list of third parties, the number of workers they have, contact persons, work agreements, and ensuring other matters related to compliance with laws and regulations in Indonesia. At present the certification unit has only one contractor for CPO Transport (CV Mitra Lintas Borneo), one health laboratory for MCU, one hazardous waste transport, one company for testing and any others. However, currently there is only 1 contractor (CV Mitra Lintas Borneo) who is used and works directly in the company's operational area (for other contractors it is only used on average once a year).

In managing the contractor, the certification unit has a copy of the cooperation agreement in each unit. For example for agreement between two parties such as Work Agreement related to CPO Transport Works between PT Nabire Baru and CV Mitra Lintas Borneo No. PTNB/C/221.1 dated March 22, 2019, the term of the agreement is from November 1, 2018 to October 31, 2025. The company always conveys the company's Code of Ethics to the contractor.

At the time the audit was carried out, certification unit third parties list document shown was in accordance with the actual, such as the contact number of each stakeholder contacted by the auditor as stated in the list. The explanation above can be concluded that the certification unit has managed and documented the list of contractors along with supporting documents.

2.2.2

In each work agreement between the certification unit and the third parties, there are several separate clauses related to fulfilling legal obligations in force in Indonesia as one of the obligations that must be fulfilled by the third parties. Some of these obligations are related to:

- Compliance with regulations and ethical codes that apply in the company
- Compliance with licensing from the competent authority in accordance with applicable laws and regulations, as well as guarantees that there will be no child labor, forced labor or the results of human trafficking.
- Compliance with labor regulations including providing health insurance, work safety insurance and/or labor social security (*jamsostek*) to each employee.
- Concerning occupational safety and health (OHS) including the obligation to use PPE
- Regarding the obligation to preserve the environment

To ensure compliance above with these clauses, the certification unit always requests the requirements for the completeness before the contractor does / starts work. The results interviews with contractor revealed that workers had received wages accordance with

the minimum wage, were registered in the BPJS program, have a legality document, and the worker have been given the standard PPE. This result is in line with the results of the document review which proves that the wages of contractor workers are above the minimum wage, fulfilling tax payments, BPJS, standard PPE and other requirements. For example, fulfillment of CV Mitra Lintas Borneo includes:

- The *BPJS Ketenagakerjaan* Payment CV Mitra Lintas Borneo for period of October 2022 that has been paid in 19 October 2022.
- The *BPJS Kesehatan* Payment CV Mitra Lintas Borneo for period of October 2022 that has been paid in 19 October 2022.
- CV Mitra Lintas Borneo contractor evaluation document for the October 2022 period which was carried out on October 17, 2022 with 6 assessment points including those related to the quality of contractor performance, labor compliance, compliance with K3 implementation and others. The results of the evaluation that month CV Mitra Lintas Borneo got a "Good" score.

Of all the regulations mentioned above, CV Mitra Lintas Borneo have complied with all of these regulations which were checked on October 2022. The certification unit has proven that all contracts have their own clauses regarding the fulfillment of applicable legal obligations, and are shown by the relevant third party.

2.2.3

In each work agreement between the certification unit and the contractor, there are clauses related to fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the contractor. Some of these obligations are related to disallowing child, forced and trafficked labor to be employed by the third party (contractors), and where young workers are employed, the contracts include a clause for their protection. To ensure compliance with these clauses, the certification unit always requests the requirements for the completeness before the contractor does / starts work.

The results of the interview with the contractor workers revealed that there were no workers under the age of 18 and the work provided was in accordance with the agreement when the initial worker worked. This is in line with the results of document verification to contractors (CV Mitra Lintas Borneo) stating that no child laborers have worked up until now, there are no forced laborers / workers resulting from trafficking because all workers have understood the work agreement at the start of work and payment for the work is always equal.

The certification unit has proven that all contracts have clauses disallowing child, forced and trafficked labor to be employed by the third party, and where young workers are employed, the contracts include a clause for their protection.

Status: Comply

2.3

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

2.3.1

The company currently receives FFB directly from major suppliers, namely FFB from PT Nabire Baru: Bukit Nuhgojaje Estate, Sungai Wami Estate, Kali Bambu Estate, KPMA Wate Asiaina and KPMA Waoha and PT Sariwana Adi Perkasa: Sungai Sima Estate and KMPA Sarakwari & Koroba. The company does not receive FFB from farmers or other oil palm plantation companies in the vicinity of the company.

2.3.2

The company currently has not received the FFB indirectly.

Status: Comply

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

3.1

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

3.1.1

The unit of certification has an annual activity plan up to a 3-year plan (budget year 2022/2023 – 2024/2025 which is contained in the PT Nabire Baru Long Term Plan for both plantations and mills. The document contains information on FFB production plans, CPO and PK production, yield projections, operational costs, etc. An example is the plan for 2022/2023:

- Projected production: 158,800 tons

- Projected CPO: 38,112 tons
- Projected PK: 4,764 tons
- OER: 24.00 %
- KER: 3.00%

3.1.2

Based on review of the unit of certification area statement document, it is known that the oldest plant was planted in 2012 and the youngest plant was planted in 2017. In addition, the management representative stated that the unit of certification does not have a replanting program for the next 5 years.

3.1.3

Management reviews are carried out periodically as indicated in the Objective Target and Program Summary document for the 2022/2023 period which was held on March 2nd, 2022 and was attended by 21 participants consisting of General Manager, Sustainability, Head of Department of each unit and other staff. During the meeting, discussions included budget discussions, results of internal audits, process performance and product conformity as feedback from customers, status of preventive actions and improvement plans, improvement follow-up plans, management system reviews, and recommendations for improvement.

The unit of certification has also shown the results of internal audit documents as a form of implementing sustainability against the principles and criteria in oil palm plantations. The audit activity was carried out on July 19th – 21st, 2022. In addition, the unit of certification has also shown the results of the unit of certifications financial audit report conducted by the public accounting firm Purwanto, Sungkoro & Surja with report number 00020/2.1032/NS.0/01/0692-6 /1/VI/2020. The report explains that "In our opinion, the accompanying financial statements present fairly, in all material reports, the financial position of PT Nabire Baru & PT Sariwana Adi Perkasa as of March 31st, 2022, and its financial performance and cash flows for the year then ended, in accordance with the policy Accounting Group Goodhope Asia Holding LTD."

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

Social and Environmental Aspect

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

Best Management Practices Aspect

The Company has implemented a commitment to continuous improvement, including:

- The company has conducted an Early Observation System (EWS) detection check for pests and diseases.
- Biological control of oil palm leaf-eating caterpillars (UPDKS) by planting and maintaining (conserving) host plants for natural enemies of leaf-eating pests, such as Antigonon leptosus, Cassia cobanensis and Turnera subulata.

- The company no longer uses a limited pesticide with the active ingredient Paraquat.
- The unit of certification re-uses palm oil waste such as empty fruit bunches.

Based on information from the results of the document review, field observations and interviews that there is evidence of the implementation of the action plan for continuous improvement, taking into account the main social and environmental impacts and opportunities faced by the unit of certification.

3.2.2

The company has shown the auditor regarding the RSPO metric template Version 2.1 that has been filled in according to the facts and data in the company's record documents, such as the number of workers, the area of production to the record of work accidents. Based on team auditor's review, the information has been matched with others document, such as supply chain record, demographic workers, work accident, etc.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The unit of certification already has a plantation SOP that explains the procedures for land clearing to the harvesting process. One example is the procedure related to harvesting activities contained in Chapter 11 SOP Agro Plantations Ref. Code: OP/C11/03/19/02 Revision March 2019. In addition, the unit of certification also has procedures related to palm oil mill activities that explain the receipt of FFB in security posts to processing machine maintenance procedures in palm oil mills. For example, Weighbridge Operation SOP number SOP-MILL-002 dated November 12th, 2018.

The unit of certification routinely conducts socialization related to SOPs related to technical work to all workers in the plantation and factory units, for example the socialization which was held on May 13th, 2022 and was attended by 102 people. This is in line with the results of interviews with harvest workers in Block I20 Division 1 of SWE which stated that workers had understood the standard of maturity of FFB that was suitable for harvesting.

The unit of certification already has the necessary SOPs/work instructions for both the processing process and the process of monitoring and measuring the quality of CPO.

3.3.2

The unit of certification has a mechanism to check the implementation of procedures consistently, namely through internal audit activities. The unit of certification also routinely conducts socialization to all workers in each plantation and factory unit to increase understanding related to technical work implementation procedures. In addition, to check the implementation of work procedures carried out by contractors/third parties, the unit of certification evaluates contractors and conducts inspections when submitting minutes of work completion at each stage of payment. The unit of certification also evaluates the contractors that have been discussed in indicator 2.1.2.

For example, during field observations at POM it was known that every visitor who entered POM had to use PPE according to their activities. The inspection is carried out by POM security and safety officers.

3.3.3

Internal audits are conducted annually, referring to the standards and certification systems of ISPO 2020, RSPO INANI 2020, ISO 14001:2015 and ISO 45001:2018. The audit report is recorded in the Form No. document. IMS.P-13.F-03 (Rev. 0) dated March 16th, 2015. The latest unit of certification internal audit resume is described as follows:

- An internal audit of the Nabire Matoa Factory was conducted on July 18th – 19th, 2022 with the conclusion that there were 2 field findings and had been fulfilled in August 2022.
- An internal audit of the BNE unit was conducted on July 20th, 2022 with the conclusion that there was 1 field finding and had been fulfilled in August 2022.
- An internal audit of the SWE unit was conducted on July 19th, 2022 with the conclusion that there were 2 field findings and had been fulfilled in August 2022.
- An internal audit of the KBE unit was conducted on July 19th – 20th, 2022 with the conclusion that there were 3 field findings

and had been fulfilled in July – August 2022.

- An internal audit of the SSE unit was conducted on July 20th, 2022 with the conclusion that there were 2 field findings and had been fulfilled in July – August 2022.

The unit of certification shows some evidence of improvement in operational activities based on the results of the internal audit in July 2022, as follows:

- Cleaning of oil traps in the factory CWS area.
- Carry out an updated Safety Data Sheet (SDS) to ensure that the installed SDS is no more than 5 years from the date of issue.
- Equip work equipment for pick-up workers, such as providing scratch-picking tools to prevent snake bites.
- Cleaning the drainage behind the KBE housing.
- Updating the contents of the first aid kit at the SSE office and warehouse.

Status: Comply

3.4

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

3.4.1

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

- Environmental Impact Analysis Document (AMDAL)
Plan for Development of Oil Palm Plantation and POM by PT Nabire Baru in Yaur District and Yaro District, Nabire Regency, Papua Province, including documents: 1. ANDAL (Environmental Impact Analysis), 2. RKL and RPL (Environmental Management Plan and Environmental Monitoring Plan). There is a Decree of the Governor of Papua No. 292 of 2013 dated December 18, 2013. This has been participatory developed by relevant stakeholders in including volving the nearest community on 22 April 2014.
- Environmental Impact Analysis (AMDAL) Document Development Plan for Plantation and Palm Oil Processing Mill with an Area of 8,950 Ha in Sima Village, Yaur District, Nabire Regency, Papua Province by PT. Sariwana Adi Perkasa, includes the following documents: 1. ANDAL (Environmental Impact Analysis), 2. RKL and RPL (Environmental Management Plan and Environmental Monitoring Plan). There is a Decree of the Regent of Nabire Number 160 of 2014 dated December 15, 2014. This has been participatory developed by relevant stakeholders in including volving the nearest community on 22 April 2014.
- Historical HCV Assessment.
Assessment on 2011.
 - Identification and Analysis of the High Conservation Values (HCV) in the PT. Nabire Baru and PT. Sariwana Adi Perkasa, Papua Province in collaboration with the HCV Team of the Faculty of Forestry, IPB, 2011.
 Assessment on 2014
 - Re-Assessment Identification of High Conservation Values (HCV) in the PT. Nabire Baru and PT. Sariwana Adi Perkasa, Papua Province in collaboration with the HCV Team of the Faculty of Forestry, IPB, 2014.
 Assessment on 2017
 - High Conservation Value (HCV) Assessment Documents of PT Nabire Baru and PT. Sariwana Adi Perkasa - Nabire Regency, Papua Province, March - October 2017 in collaboration with Ekologika Consultants.
 - Stakeholder Consultation Document for Pre-Assessment of High Carbon Stock (HCS) and High Conservation Value (HCV) in PT. Nabire Baru and PT. Sariwana Adi Perkasa, Nabire Regency, Papua Province, 8 June 2017.
 - Stakeholder Consultation Report for Post Assessment of High Carbon Stock (HCS) and High Conservation Value (HCV) in the areas: PT Nabire Baru and PT Sariwana Adi Perkasa, Nabire Regency, Papua Province, 30-31 August 2017.- Historical Social Impact Assessment
Assessment on 2011.
 - Document Social Impact Assessment Cooperation of PT. Nabire Baru and PT. Sariwana Adi Perkasa with the Faculty of Forestry, Bogor Agricultural University 2011. The assessment based on forum group discussion involved nearest community Wanggar Pantai dated 3 August 2011.
 Assessment on 2018

- Social Impact Assessment Report of PT Nabire Baru & PT. Sariwana Adi Perkasa Nabire Regency, Papua Province, Indonesia, March 2017 – February 2018 in collaboration with Ekologika Consultants.
- Stakeholder Consultation Report for the Social Impact Assessment (SIA) in PT Nabire Baru and PT Sariwana Adi Perkasa Areas, Nabire Regency, Papua Province in Sima Village and Wanggar Pantai, 8 February 2018.

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

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

3.4.2

Unit of certification has managed and monitored social and environmental impacts that are carried out independently by involving affected stakeholders. Some evidence of documentation of activities that have been carried out are as follows:

Social Impact Assessment (SIA)

Social monitoring and management plan included The Social Impact Assessment conducted in 2011.

- Social impact assessment on 2011
 - Document Social Impact Assessment collaborated of PT. Nabire Baru and PT. Sariwana Adi Perkasa with the Faculty of Forestry, Bogor Agricultural University 2011. The assessment based on forum group discussion involved nearest community Wanggar Pantai dated 3 August 2011.
- Social impact assessment on 2018
 - Social Impact Assessment Report of PT Nabire Baru & PT. Sariwana Adi Perkasa Nabire Regency, Papua Province, Indonesia, March 2017 – February 2018 in collaboration with Ekologika Consultants. Stakeholder Consultation Report for the Social Impact Assessment (SIA) in PT Nabire Baru and PT Sariwana Adi Perkasa Areas, Nabire Regency, Papua Province in Sima Village and Wanggar Pantai, 8 February 2018. There is a list of attendees and signatures of those who attended the forum group discussion.

Based on document verification, the management plan and monitors the social impact that the company has implemented based on participatory results with affected parties. The program has included an issues management schedule and PIC. Social and environmental management and monitoring plan has been developed with the participation of affected stakeholders. The form of stakeholder involvement is through discussions and interviews. There is recorded evidence in the form of the attendance list of activities public hearing on January 6th, 2010. The event was attended, among others, by Community leaders, customary leaders, youth groups, Forest Agency, Environmental Agency, Agriculture Agency, Social Agency, local NGOs, and others. Based on the interviews with the surrounding community, relevant agencies, and internal stakeholders, the company has identified and managed environmental and social impacts such as social assistance, infrastructure improvements, surface water management, land ownership licensing processes, etc. During the audit, the company has shown a document of social impact management and monitoring plan activities for the period 2021-2022. All components have been included in this report of Social Impact Management and Monitoring 2021-2022. This has been included components such as the development of plasma plantations for indigenous peoples includes the lack of community plantation development, jealousy of people's income acquisition, local employment, CSR jealousy and social responsibility.

Based on the results of consultations with workers' representatives, there is no form of discrimination against workers, no underage workers were found, the company has also fulfilled the rights of its employees, and the company has provided several critical facilities

for employees. Such as housing, water, electricity, places of worship, public facilities, educational infrastructure (schools), and other facilities. Unit of certification also allocates resources for the maintenance of the entire facility. The resource persons also stated that they could voice their views through their representative institution or a spokesperson they choose in the evaluation activities to review and develop mitigation plans and monitor the success of the implemented projects.

Based on the results of interviews with the people of Kampung Sima along with the customary rights owners and community leaders from the surrounding tribes (Yerisiam and Wate Tribes), it is known that unit of certification has routinely carried out social identification/study in their village carried out by the CSR Team, where the results will be used as a reference for making social and environmental management and monitoring programs whose target is the welfare of the surrounding community. The assistance provided has covered all levels of society, including indigenous peoples. All impacts also has been covered in program established by unit of certification.

Environmental Impact Assessment (EIA)

Implementation of environmental monitoring and management plan are documented on periodical report of environmental monitoring and management implementation report (RKL-RPL) report for PT Nabire Baru and PT Sariwana Adi Perkasa. Unit of certification is consistently done the environmental management and monitoring as outlined in Report of Environmental Management and Monitoring per semester regularly. This is one of effort of the company to develop its management and monitoring plan by participatory manner with affected party. This report described the realization of monitoring and management of the environment in accordance with environmental parameters in monitoring and management implementation report (RKL-RPL) report based on document verification Second Semester 2021 and First Semester 2022.

Company established an HCV management plan to maintain the HCV areas in operation are listed on the Management plan HCV 2021 documents. HCV management and monitoring implemented that taken by the management unit such as boundary pole maintenance, spatial monitoring, fire patrol monitoring, socialization of HCV HCS, biodiversity monitory, etc. Further explanation of HCV management and monitoring plan is contained in 7.12.4.

Besides, company has also evidence of implementing environmental and social impact management and monitoring plan, reviewed, and updated in a participatory manner with affected stakeholders. Based on the results of interviews with the people of Kampung Sima along with the customary rights owners and community leaders from the surrounding tribes (Yerisiam and Wate Tribes), it is known that unit of certification has routinely carried out social identification/study in their village carried out by the CSR Team, where the results will be used as a reference for making social and environmental management and monitoring programs whose target is the welfare of the surrounding community. The assistance provided has covered all levels of society, including indigenous peoples. All impacts also has been covered in program established by unit of certification.

3.4.3

Unit of certification has made efforts to implement the management and monitoring of social and environmental impacts as described in indicator 3.4.2. In addition, company also periodically updates the administration in a participatory manner. Some documentary evidence of the actions that have been made are as follows:

Social Impact Assessment (SIA)

Unit of certification has shown evidence of implementing the social impact management plan, reviewed, and updated in a participatory manner with affected stakeholders. This review has been conducted annually. Based on the results of interviews with the people of Kampung Sima along with the customary rights owners and community leaders from the surrounding tribes (Yerisiam and Wate Tribes), it is known that unit of certification has routinely carried out social identification/study in their village carried out by the CSR Team, where the results will be used as a reference for making social and environmental management and monitoring programs whose target is the welfare of the surrounding community. The assistance provided has covered all levels of society, including indigenous peoples. All impacts also has been covered in program established by unit of certification.

Environmental Impact Assessment (EIA)

Unit of certification involves Environment Agency and the Ministry of Environment and Forestry to monitor the results of environmental management that has been carried out by the company in the form of presenting RKL-RPL reports and other environmental management documents sent every certain period which can be proven in indicator 1.1.2. The company also does not block access to all environmental agencies if they are going to carry out field verification to their management areas. It aims to obtain advice and advice in carrying out environmental management in accordance with the vision, mission, and government programs so that they can

run synergistically. This can be proven based on the results of interviews with the Environmental Agency of Nabire Regency which has carried out field visits around March 2022 to carry out periodic monitoring. Monitoring and updating related to environmental impact management is also carried out in conjunction with an evaluation of HCV management which is described in more detail in indicator 7.12.4. However, in general, all recommendations from the evaluation of HCV management carried out in a participatory manner will be carried out in line with the management and monitoring of environmental impacts.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1

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

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

One of the socializations given to workers was related to Company Policies and Regulations in 02 June 2022 which was attended by all workers on muster morning. The certification unit did not have workers with contract status for daily worker (BHL) and contract workers (PKWT), currently the company only has workers with the status of permanent workers (SKU-H and SKU-B) and Staff (Assistant and above). All the rights for each employment status have been distinguished. Based on the results of interviews with workers in the estate and mill units and representatives of the bipartite, it is known that the workers have understood the recruitment, selection, promotion and other employment procedures contained in the Company Regulation and in other procedures.

From this explanation it can be concluded that the certification unit has procedures for recruitment, selection, employment, promotion, retirement and termination of employment must be documented / available to workers and their representatives in accordance with applicable laws and regulations.

3.5.2

The certification unit always documented all labor procedures that have been carried out properly such as recruitment, promotion, performance assessment, pension and others. The following are some sample labor procedures that have been implemented and are well documented by certification unit, including:

- Workers with initial JFB (R & D Supervisor) with the status of SKU-H and NIK 820430534 workers who submitted a job application on April 16, 2022 and were immediately selected on the spot. The result is that the workers have passed the selection of recruitment of workers (interviews, health and others) so that on the same date the workers signed an Permanent Worker Agreement (PKWTT) No. 05/PKWTT/GMO-HRD/III/2022 dated April 16, 2022 and must follow a probationary period for 3 months (19 April – 18 July 2022) before being appointed as permanent workers with SKU-H status. The company can also show proof of the results of the 3 month probationary period and the employee has passed, thus obtaining a Permanent Employee Appointment Decree dated 19 July 2022 from the HR & GA Manager stating that the employee has been appointed as a Permanent Employee since 19 July 2022. Also in the employment document, other supporting documents have been shown, such as the results of orientation as a new employee, completeness of worker documents (ID Card, Family Card, etc.), statement letter following company regulations and policies and others.
- Workers with initial HSY (Sample Boy Mill) with the status of SKU-B and NIK 820430519 workers who submitted a job application on January 19, 2022 and selected on March 13, 2022. The result is that the workers have passed the selection of recruitment of workers (interviews, health and others) so that on the same date the workers signed an Permanent Worker Agreement (PKWTT) No. GMO/HRD-PT.NB/III/2022/002 dated March 31, 2022 and must follow a probationary period for 3 months (01 April – 30 June 2022) before being appointed as permanent workers with SKU-B status. The company can also show proof of the results of the 3 month probationary period and the employee has passed, thus obtaining a Permanent Employee Appointment Decree dated 01 July 2022 from the HR & GA Manager stating that the employee has been appointed as a Permanent Employee since 01 July 2022. Also in the employment document, other supporting documents have been shown, such as the results of orientation as a

new employee, completeness of worker documents (ID Card, Family Card, etc.), statement letter following company regulations and policies and others.

- There is a pension document for workers with initial JRD retired on 02 October 2022 according to Decree on 30 September 2022. In addition to the decree, there are also other supporting documents such as calculation of pension payments, labor documents of workers since they first worked, etc. All procedures and documents shown are in accordance with existing procedures and in accordance with applicable laws.

The results of interviews with workers (harvesting, spraying and mill operators) in note that the certification unit has carried out labor procedures starting from recruitment, selection, acceptance, promotion and retirement procedures in accordance with existing regulations, as well as all the application is assessed in accordance with the abilities and competencies of the employees. For example, workers who initially entered were selected before being accepted, workers who received promotion / class promotion had received an assessment from their superiors and workers who retired received all their rights as retirees. During 2021 until September 2022 there were no labor issues that occurred at certification unit, this was in accordance by the results of consultations with the Bipartite Committee, the Manpower and Transmigration Agency of Nabire Regency which stated that the application of existing labor procedures certification unit is in accordance with the regulations and since 2021 until now there have been no labor issues.

Based on the description above, it can be concluded that the certification unit already has labor procedures implemented and records are maintained for each worker.

Status: Comply

3.6

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

3.6.1

The unit of certification indicates procedures related to Hazard Identification and Environmental Aspects and Risk Assessment with the number IMS.P-01 dated May 4th, 2015 which was approved by the Chief Operating Officer. The SOP describes hazard identification, environmental impact analysis and all activities/ works, work processes, work methods, work places/locations, work equipment and materials with using the Hazard Identification Form, Environmental Impact Analysis and HSE Risk Assessment and consider things such as routine activities, normal, abnormal, and emergency conditions. Making Hazard Identification, Environmental Impact Analysis and HSE Risk Assessment is made before work is carried out in all sections/departments and must be reviewed (evaluation and correction) at least once a year.

The unit of certification shows the Hazard Identification Form, Environmental Impact Analysis and HSE Risk Assessment for the period 2022/2023 prepared by the OHS Expert. During the audit activity, the certification unit shows a recording of Hazard Identification, Environmental Impact Analysis and HSE Risk Assessment in each work unit, such as in plantation units, factories, agronomy, workshops, electrical engineering, civil engineering and other work units. Based on the results of the document review and field verification, it is concluded that each operational activity in the certification unit has identified its type and risk management plan. There are several examples of risk identification activities and plans, such as:

- Weed and pest control maintenance activities, use of pesticides, herbicides, and insecticides. With potential environmental impacts, including illness caused by exposure to chemicals in the eyes, skin, hands, feet. Spills and spills of pesticides that cause surface water pollution and soil pollution. The current controls planned by the certification unit include routine oral briefing, HSE inspections, implemented of spraying HSE SOPs, use of PPE such as aprons, rubber gloves, boots, and masks.
- Harvesting activities with the potential impact on the feet and body when the fruit is hit by sharp work tools causing bruises/wounds, powder contact with eyes causing irritation/permanent disability and injury (sprains). The current controls carried out by the certification unit include routine verbal directions, HSE inspections, implemented of Harvesting HSE SOPs, inspection of PPE completeness such as using shoes and helmets for harvesting activities.
- The boiler operational process at the boiler station with the potential impact of chimney emissions exceeding NAV, black smoke emissions, noise exceeding NAV and greenhouse gas emissions. The current controls planned by the certification unit are conducting routine maintenance and monitoring exhaust emissions, performing regular maintenance and maintenance of boiler machines, monitoring noise levels, installing safety signs, using earplugs, helmets and rotating workers.

Management unit can show evidence of HIRADC socialization and OHS plan to employees. The examples of socialization activities such as:

- Socialization of work environment, safety and health briefings to workers in the SWE Division 1 unit on February 25th, 2022.

which was attended by 130 people.

- Socialization of work environment, safety and health directives to workers in the BNE Division 2 unit on May 27th, 2022 which was attended by 69 people.
- Socialization of work environment, safety and health briefings to workers in the NMM unit on October 10th, 2022, which was attended by 10 people.

The results of interviews with harvest workers, loose fruit pickers and FFB transport workers at SWE as well as sterilizer operators, boiler operators and machine room operators at NMM, it is known that employees have understood how to work safely, PPE that must be used, and emergency response procedures in each job. Based on the explanation above, it is known that there are results of risk identification and implementation plans that are socialized to management and workers.

3.6.2

Monitoring is carried out periodically by conducting *P2K3* management meetings and *P2K3* reporting to relevant agencies as needed once every 3 months. One example is the EHS meeting which will be held on July 26th, 2022. During the meeting the following topics were discussed:

- EHS Performance of PT Nabire Baru and PT Sariwana Adi Perkasa
- Discussion of accident investigation
- Discussion of non-conformance issues and follow-up actions, examples of issues: There are several *egrek* and *dodos* belonging to harvest workers who were not given safety/protective gloves around the BNE housing. As a corrective action, the certification unit has provided an understanding of the importance of work safety to harvesters.
- Suggestions for improvement
- And other things.

Based on the results of interviews with workers in all plantation units, information was obtained that a common work accident at PT Nabire Baru and PT SAP was snake bites. As an anticipatory measure, the certification unit routinely conducts training and socialization related to health and safety in the workplace to its workers. The following is an example of the realization of OHS training, namely:

- Factory OHS training (working at heights, confined spaces, safety using machines, etc.) which was held on July 13th, 2022 and was attended by 12 process operators.
- Spray OHS training which was held on August 25th, 2022 and was attended by 15 spray workers in the SWE unit.
- Harvest safety training which was held on June 27th, 2022 and attended by 93 harvest workers in the BNE unit.
- Transportation safety training which was held on August 2nd, 2022 and attended by 5 dump truck drivers in the KBE unit.

The unit of certification shows a training certificate document and an OHS License (operational license) belonging to workers who work using high-risk tools, for example:

- Certificate of OHS Wheel Loader Operator, number 5/293642/AS.02.00/VIII/2020. Workers with the initials HMP have attended OHS technical training in the field of lifting and transport aircraft on July 23rd – 25th, 2020. Then, a Lifting Aircraft License is shown which is valid until August 3rd, 2025.
- Certificate of OHS Steam (Boiler) Operator, number 5/11200/AS.02.00/IX/2020. The worker with the initials AG has attended OHS technical training in the boiler sector on September 16th – 18th, 2020. Then, a Boiler License is shown which is valid until September 30th, 2025.
- Certificate of OHS Engine Room Operator, number 5/11022/AS.02.00/IX/2020. Workers with the initials SGNT have attended OHS technical training in the engine room field on September 23rd – 25th, 2020. Then, a Power & Production Aircraft License is shown which is valid until August 3rd, 2025.
- Certificate of OHS Electrical Technician, number 5/11023/AS.02.00/IX/2020. The worker with the initial H has attended OHS technical training in the electrical field on July 23rd – 25th, 2020. Then, an Electrical Technician License is shown which is valid until August 3rd, 2024.
- Certificate of OHS Expert in Chemistry, number 5/1507190722/AS.01.04/VII/2022. Workers with the initials LNP have attended OHS training in chemical supervision techniques on February 7th – 19th, 2022. Then, a Chemical Specialist Expert License is shown which is valid until July 19th, 2025.
- Certificate of Class III Welder on September 30th, 2020. Workers with the initials RS are declared to have passed the welder training.

- Certificate of *Hiperkes* with the initials dr. ET who has attended the *Hiperkes* and Occupational Safety training on July 17th – 26th, 2011.

Then, the certification unit also has a plan for health checks for all employees which is contained in the Annual Medical Check Up and High-Risk Medical Check Up documents for the 2022 period. The document informs the plan to carry out periodic and special health checks for all workers. As a form of implementation of the health examination program, the certification unit shows the results of the general and special MCU examination records, which are as follows:

- General health examination (annual MCU) is conducted once a year periodically for all workers. Periodic health checks have been carried out since January 2022 and the last time was in September 2022. From the results of these inspections, information was obtained that a total of 256 workers out of a total of 1,838 workers at PT Nabire Baru and PT SAP had their health checked. The management representative stated that the general MCU will continue until December 2022 until all workers have been inspected.
- Audiometric examination was carried out in May 2022. There were 57 Mill and CWS workers who were examined and from the recording of the results of the examination it was known that 7 mill workers and 2 CWS workers had mild, moderate and moderate-severe hearing loss. A follow-up examination is planned for November 2022.
- The spirometry examination was carried out in September 2022. A total of 269 spray and fertilizer workers at PT Nabire Baru and PT Sariwana Adi Perkasa were examined and the results of the examination revealed that 43 workers had mild pulmonary restrictions. A follow-up examination is planned for November 2022.

The certification unit has the opportunity to realize periodic health checks and immediately follow up on special MCU examinations according to the planned schedule. **OFl.**

Status: Comply

3.7

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

3.7.1 & 3.7.2

The company has identified training needs for each of its employees according to the position and type of work. For example, the identification that has been carried out by the company is the Fire Emergency Response Simulation which is intended for the entire Fire Emergency Response Team and Agronomic Techniques/Procedures (harvest, manuring, spray, upkeep and others) aimed at field workers such as harvesters, sprayers, upkeep workers and others. After identifying, the company compiled a training program for 2022-2023 which was approved by the General Manager on March 7, 2022 as follows:

- Program for Technical Skills which includes 9 trainings planned.
- Program for Safety & Medical in which 8 trainings are planned.
- Program for Human Resources & Industrial Relationship which includes 5 trainings.
- Program for Soft Skills in which 10 trainings are planned.

To ensure that all of the training programs have been running according to the timeframe, the company has made documentation for each of the training activities carried out. The following is the realization of the training that has been carried out by the certification unit for the period 2022-2023, namely:

- Weeding control training (including calibration of spray equipment, doses and others) on September 6, 2022 at KBE which was attended by 7 participants who are upkeep/spray workers.
- Weed control training (including calibration of spray equipment, doses and others) on 18 and 22 August 2022 at SWE which was attended by as many as 25 participants who are upkeep/spray workers.
- Training on fertilizer application on September 14, 2022 at SWE which was attended by 10 participants who were upkeep/spray workers.
- Training on fertilizer application on September 6, 2022 at KBE which was attended by 7 participants who were upkeep/spray workers.
- Occupational OSH training for workers at Matoa Mill on 15 July 2022 which was attended by 11 participants.
- OSH training in process activities such as LOTTO, working at height and others on 26 August 2022 which was attended by 17 participants.
- Fire Emergency Response Simulation on September 24, 2022 for all workers and fire emergency response personnel in PT Nabire Baru & PT Sariwana Adi Perkasa.

- The fertilization application training at SSE which was held on May 8, 2022 was attended by 11 participants.

Based on field observations and interviews with workers (harvesters, sprayers and mill operators), it is known that workers have understood their work in accordance with the procedures set by the company and their understanding of the duties and responsibilities for each job has been carried out quite well, because the certification unit has routinely conducted training every year according to the type of work each. Meanwhile, the results of interviews with representatives of third parties (transporter) and their workers in field and the surrounding community revealed that they had received routine socialization related to company policies, code of conduct, PPE, communication procedures and complaints were routinely provided by the certification unit which causes stakeholders to understand the procedures and work methods that already exist in the company's operational area.

Based on the foregoing, it can be concluded that the certification unit has a training program for all workers including stakeholders (contractors, suppliers, local communities and smallholders) related to the RSPO P&C and all of them have been well documented.

3.7.3

The Company showed that they had properly documented every training activity and socialization that had been carried out to all workers, contractors, and related stakeholders. The training of SCCS had been conducted on 16 June 2022 for weighbridge operator, laboratory, and admin. Based on the interview with all workers involved in supply chain operations, such as security (for FFB receiving verification), weighbridge operator (for dividing amount of certified and uncertified sourced), and the PIC related to supply chain, they have been understood the supply chain mechanism, and the book keeping record has conducted and monitored quite well.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1, 3.8.2

The mill is receiving and processing FFB from certified and uncertified sources, hence, the RSPO SCCS Module E (MB) are applied.

3.8.3.

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

	Last Year Projected Certified Volume (MT)	Actual production from February to September 2022 (MT)	Estimation for the next 12 months
FFB Processed	110,000	65,647.50	112,000
CPO Production	25,000	15,114.47	26,000
Palm Kernel (PK) Production	3,300	1,996.12	3,400

For the estimation of the next 12 months, it is still in the sanction period, so there is no plan to sell certified product.

3.8.4

The Mill have been registered in RSPO IT platform for license period (14 February 2022 – 13 February 2023), with license id CB131079, RSPO member id: RSPO_PO1000011406, member name: Nabire Matoa Palm Oil Mill.

Until now, the company is still in a 3 year sanction period (till 2024), unable to sell certified production, so there is no transaction activity on the RSPO palm trace platform.

3.8.5

Nabire Matoa POM has procedures related to supply chain in Document Ensuring Traceability of RSPO Certified Product (CPO, PK, PKO & PKE), 6th Revision on October 2020. The procedure explains the person in charge of the supply chain and details for each supply chain activity, for example related to training, transaction registration, and recording from receipt, storage, sale, handling of non-conforming products, and reporting.

The company's procedures have been revised in accordance with the latest RSPO SCCS system reference (Revised 01 February

2020).

3.8.6

The company has conducted an internal audit of the RSPO and supply chain on 19 to 21 July 2022. Based on the results of the internal audit, it is known that there are no non-conformities in the supply chain aspect.

In relation to supply chain internal audits, this achievement is always an amendment in management review meetings as the basis for planning activities for the next period, for example in management review records in January 2022.

3.8.7

Nabire Matoa POM received FFB from certified and uncertified sources, here's the detail:

Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Oct 2021	-	11,998.51	11,998.51
Nov 2021	-	12,556.76	12,556.76
Dec 2021	-	11,072.08	11,072.08
Jan 2022	-	12,375.89	12,375.89
Feb 2022	4,575.71	5,836.56	10,412.27
Mar 2022	8,619.27	2,773.65	11,392.92
Apr 2022	8,004.61	2,396.86	10,401.47
May 2022	8,884.21	2,964.75	11,848.96
Jun 2022	8,840.11	3,094.34	11,934.45
Jul 2022	8,536.59	2,622.41	11,159.00
Aug 2022	9,036.70	2,929.66	11,966.36
Sep 2022	9,150.29	3,049.40	12,199.69
Total	65,647.50	73,670.86	139,318.36

The auditor has verified FFB received records over the last 12 months, the total FFB certified received was 65,647.50 MT.

3.8.8

The company shows documentation of certified products, such as sales contracts, shipping announcements, delivery orders, etc. These documents explain the name and contact person of the buyer and seller, date of delivery, product description, quality, quantity, member ID, and others. Here's for the examples: CSPO Delivery record on 20-21 July, 2022, Delivery Order No.: 001/PT.NB/VII/2022/SHO1VII07-00116,SHO1VII07-00119 net weight 2,700 MT; Record Document 36.366.00990.24.014; Buyer PT Multi Nabati Sulawesi; Product Specification FFA <5%. All shipping record also has unique number. All sales are conventional sales for both CPO and PK, because the certificate holder is still in the 3 year sanction period and cannot claim the certified product.

3.8.9, 3.8.10, 3.8.11

The Company has cooperation with third parties related to the handling of the transportation of certified products, namely CV Mitra Lintas Borneo (No.: PTNB/C/221.1) which is valid from March 22, 2019 to October 31, 2025. From the results of the review of the agreement documents, it is known that information related to compliance with government regulations, transporters are obliged to provide and use PPE when working. There also statement letter from transporter namely CV Mitra Lintas Borneo which stated that transporter willing to comply to all RSPO requirement and willing to be audited by CB.

3.8.12

Nabire Matoa POM has record of all CSPO and CSPK information, as well as presented in the table bellows:

Crude Palm Oil

Month	CPO					
	CSPO	Non	Total	CPO sold - MB	CPO Sold-Credit	CPO sold Non certified
Oct-21	-	2,696.12	2,696.12	-	-	1,955.20
Nov-21	-	2,965.35	2,965.35	-	-	1,949.62
Dec-21	-	2,579.07	2,579.07	-	-	-
Jan-22	-	2,973.26	2,973.26	-	-	2,798.95
Feb-22	1,113.77	1,369.08	2,482.85	-	-	2,803.76
Mar-22	2,012.07	646.56	2,658.64	-	-	1,201.47
Apr-22	1,849.17	551.11	2,400.27	-	-	2,802.02
May-22	2,033.77	689.89	2,723.66	-	-	-
Jun-22	1,997.22	697.38	2,694.59	-	-	2,548.48
Jul-22	1,906.80	579.17	2,485.97	-	-	2,713.17
Aug-22	2,083.72	677.75	2,761.47	-	-	-
Sep-22	2,118.45	704.69	2,823.14	-	-	2,671.25
Total	15,114.97	17,129.43	32,244.39	-	-	21,443.92

All sales are conventional sales for CSPO, because the certificate holder is still in the 3 year sanction period and cannot claim the certified product.

Palm Kernel

Month	PK					
	CSPK	PK	Total	PK sold-MB	PK sold-Credit	PK received by KCP-Matoa
Oct-21	-	373.46	373.46	-	-	373.46
Nov-21	-	386.94	386.94	-	-	386.94
Dec-21	-	337.39	337.39	-	-	337.39
Jan-22	-	376.85	376.85	-	-	376.85
Feb-22	142.13	176.87	318.99	-	-	318.98
Mar-22	262.07	84.20	346.27	-	-	346.27
Apr-22	246.46	73.43	319.88	-	-	319.88
May-22	267.12	90.56	357.69	-	-	624.81
Jun-22	267.14	93.23	360.38	-	-	360.38
Jul-22	253.93	77.14	331.07	-	-	331.07
Aug-22	278.51	90.58	369.09	-	-	369.09
Sep-22	278.76	92.73	371.49	-	-	371.49
Total	1,996.12	778.74	2,774.86	-	-	3,041.97

All sales are conventional sales for CSPK, because the certificate holder is still in the 3 year sanction period and cannot claim the certified product.

3.8.13, 3.8.14

Nabire Matoa POM has determined the extraction rate for CPO and PK to be produced. Based on actual production of CPO and PK for the last 12-month period. The Extraction rate for production projections will be updated annually based on the actual production of CPO and PK. To find out the amount of CPO and PK, the company already has a mechanism contained in the CPO/PK/CPKO/PKE

Sounding Work Instruction Document which was valid in November 2018. Measurements are carried out by laboratory personnel and are responsible for the Mill Manager.

3.8.15

Nabire Matoa Palm Oil Mill applies the MB supply chain model, because mill receives fruit from certified and uncertified sources. Sources of certified fruit come from

3.8.16

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

Member Name: Nabire Matoa Palm Oil Mill

Membership No.: 1-0175-14-000-00 (Goodhope Asia Holdings Ltd.)

Member ID: RSPO_PO1000011406

License ID: CB131079

Until now, the company is still in a 3 year sanction period (till 2024), unable to sell certified production, so there is no transaction activity on the RSPO palm trace platform.

3.8.17

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

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1 & 4.1.2

The company shows its Sustainability Policy (GAHL.SP.SUS.01) which was passed on June 25, 2020. The document is explained Respect for Human Right as follows Goodhope sets the respect of human right at the foundation of all its operation. The company respect internationally recognized human rights wherever operate and encourage the application of these principles across our supply chain. All Management units shall recognize and respect principles, rights and freedoms as stated in Goodhope's Human Rights Policy

The commitment of the certification unit in respecting human rights has been quite well implemented in the absence of issues and incidents of human rights violations that occurred in the operational area of plantations and factories. This is evidenced by document study on complaints and grievance document (internal and external) that so far there have been no incidents or issues of human rights violations occurring in the operational area of the certification unit.

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 known that the company has socialized company policies regularly including policies on human rights. Socialization is done by sticking to the policy in offices, socializing in the housing, and socializing with workers during the morning briefing before the activities started.

Based on the results of interviews with surrounding community, bipartite representatives and other workers, it is known that so far from 2020 to 2022 (September) there has never been any intimidation/act of violence committed by the certification unit against workers, communities, contractors, or other parties who cooperate with the company. If there is a problem, usually the unit of certification will negotiate in a good manner and without resorting to violence.

Based on the explanation above, during the past year there were no issues / incidents of human rights violations that occurred in the vicinity or the operational area of the certification unit so that there were no acts of intimidation / violence carried out by the certification

unit including contracted services such as security services that were contracted and others.		
	Status: Comply	
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.		
4.2.1 & 4.2.2 The management unit has a Right to complain policy which is described in Goodhope Asia Holdings LTD sustainability policy No. GAHL.SP.SUS.01 Revision 01 dated 25 June 2020 on the points: <ul style="list-style-type: none"> • Right to File a Complaint The Companies respect every claim and justified right of rights holders and will respond to complaints in a fair, responsible and consistent manner, which allows stakeholders to communicate with interested parties to seek solutions and reach an agreed settlement. • Right to Defend Human Rights The Companies recognize that every individual has the right to defend human rights and refuse intimidation and retaliation against human rights defenders and whistleblowers. <p>Aside from that, certification unit have mechanism for consultation and complaints is listed in some procedure, such as:</p> <ul style="list-style-type: none"> • The mechanism for handling complaints from stakeholders is presented in Document No. SOP-CSR-08 (Rev. 02) dated 20 June 2020 regarding the handling of complaints and complaints. This procedure refers to Law no. 7 of 2012 concerning the handling of social conflicts and the implementation rules, etc. Complaints can be carried out in person or online (email link for complaints at the national level to the Sustainability Division is available). The process of verification and classification of complaints is carried out within 14 working days from the receipt of the report. While the handling of cases will be carried out with a maximum time of 1 year. If it is not resolved, then mediation will be carried out with a third party with a maximum period of 3 years, or an extension as necessary. • Document No. IMS.P-05 (Rev. 04) dated 04 May 2015 regarding communication, participation, and consultation. The procedure explains that complaints can be submitted formally or informally and recorded in the "Book of Communication and Request for Information". Complaints will be responded to a maximum of 14 days from the time the report is received. <p>Based on interview with Statutory Bodies in Nabire Regency and Surrounding Communities of Sima Village (previous land owner, village head, smallholders and representative of ethnic group), it is known that they understand how to communicate and consult with company. However, the results of interviews with representatives of surrounding communities, the community has known about the communication procedures and to people who served as communicators between the company and community so that people who cannot read / write can be informed by the related communicators. However, certification unit can showed the documentation of socialization of Consultation and Communication Procedure to contractors and surrounding village (Sima and Wanggar Pantai Village) on 03 August and 25 July 2022.</p> <p>Based on the explanation above, it can be concluded that the certification unit has a mutually agreed system, is open to all affected parties, can resolve disputes effectively, in a timely and appropriate manner. In addition, the system has been understood by affected parties, including those who cannot read and write.</p>		
4.2.3 Based on the review of complaints / complaints documents from the surrounding community, it was found that there were complaints. However, there are several external and internal complaints as follows: <ul style="list-style-type: none"> • RSPO Complaint Reference No. RSPO/2020/17/SW which since December 21, 2020 has been received by the RSPO and its current status has been completed as of September 1, 2022 in accordance with the Appeal Decision Letter – Goodhope Asia Holding. All files related to the meeting from the beginning of the complaint to the final settlement have been well documented. • The complaint that was filed on 28 July 2022 relates to a request for assistance to take his wife who was sick due to an accident to seek treatment in the city. The company responded to this on the same date and on 02 August 2022 the company provided ambulance facilities to take the workers' wives for treatment in the city. • The complaint that was filed on 05 August 2022 relates to an application to print BPJS Health and Employment cards which can only be made online to the company for as many as 6 workers. The company responded to this on the same date and on 06 August 2022 the company printed the card for 6 workers. 		

All of the complaints mentioned above have been completely resolved by the company by showing proof of resolution in the form of documentation and direct responses related to complaints received from external and internal parties.

4.2.4

In Indonesia, giving freedom to the reporting party to obtain legal and technical assistance from an independent party is allowed and there is none regulation/procedure in certification unit that forbids it. An example is the resolution of the problem described above in which the company provides options/options to the heirs to obtain legal assistance from other independent parties.

Based on the results of document review and interviews, it is known that conflict resolution mechanisms can use the option to obtain legal and technical assistance from independent parties, this can be proven by the existence of conflict resolution related to land clearing and plasma land development between companies and communities involving NGOs and the RSPO, in addition, the company also has records regarding every progress of the conflict resolution process.

Based on the explanation and description above, it can be concluded that the certification unit has a conflict resolution mechanism/procedure which includes the option to obtain legal and technical assistance from an independent party, where the reporting party has the freedom to choose a person or group who can support it and/or act as observers as well as the parties may choose the option of involving a third party mediator.

Status: Comply

4.3

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

4.3.1

The company conducts a social impact assessment in the stage of preparing social programs. In the assessment, the company collects primary data and secondary data from the village government level, sub-district and from the relevant agency level, which is supported by data from field verification including general digital data categorized as public documents. In general, the company focuses on several programs which include tenure, plasma and plasma organization institutions, improving the economy of the surrounding community, strengthening communication and stakeholder networks, improving the quality of public health, quality of community education and coaching in the field of employment.

The recording is in accordance with the results of public consultations with surrounding villages (Sima Village), where the company has carried out activities that are beneficial to the surrounding community. For examples, there're record of social activities for surrounding communities, such as:

- Hoarding of the site of the West Nabire GKI Sima Village on May 28, 2022.
- Genset engine assistance for State Elementary School of Wami Jaya on April 11, 2022.
- Assistance for road repairs on the main road of Wanggai Pantai Village on August 12, 2022.
- Scholarship assistance at State Elementary School of Lima and State Elementary School of Wami Jaya on 16 June 2022.

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 Nabire Baru and PT Sariwana Adi Perkasa managed area with the total 20,918.85 ha in accordance with legal documents that owned (HGU Certificate) that divided in four own Estate and three fully managed smallholders Estate; however, the scope of certification is 17,808.15 Ha. There is an additional scope related to the RaCP area which was previously completed with the status of Satisfactory evaluation results. The scope of certifications is smaller than total managed its due to 3,110.7 ha excluded form scope of certification (NPP Area).

Related to legal document, here's the detail:

PT Nabire baru:

Own Estate (11,610.32 Ha) Based on Decree of the Head of the Indonesian Land Agency No. 159/HGU/BPN RI/2014 dated October

24, 2014 regarding the granting of *Hak Guna Usaha* (HGU) to PT NB over 11,610.32 ha of state land located in Sima Village – Yaur District and Wanggar Village – Yaro District, Nabire Regency, Province Papua, dated September 08, 2014. HGU decree is valid for 35 years, until October 24, 2049. From the decree, here's the certificate:

- HGU Certificate No. 00004, dated 16 January 2016, for area 306.09 ha valid until 24 October 2049
- HGU Certificate No. 00005, dated 16 January 2016, for area 1,700.62 ha valid until 24 October 2049
- HGU Certificate No. 00006, dated 16 January 2016, for area 1,833.22 ha valid until 24 October 2049
- HGU Certificate No. 00007, dated 16 January 2016, for area 5,595.92 ha valid until 24 October 2049
- HGU Certificate No. 00008, dated 16 January 2016, for area 1,872.61 ha valid until 24 October 2049
- HGU Certificate No. 00009, dated 16 January 2016, for area 301.86 ha valid until 24 October 2049

Scheme Smallholders of PT Nabire Baru (2,914.35 Ha)

Based on Decree of the Head of the Indonesian Land Agency No. 159/HGU/BPN RI/2014 dated October 24, 2014 regarding the granting of HGU to PT NB decided that the company must facilitate the development of community plantations (plasma) of a minimum of 20% of the IUP area whose location has been reserved in the Land Map No. 159/HGU/BPN RI/2014. 067-26.13-2014 dated September 08, 2014, which is on an area of 2,914.35 ha. Legal documents for Scheme smallholders are presented in the table below:

HGU Certificate No	Date Of Issue	Expiry Date	Ha
No. 00010	23rd September 2015	23 September 2050	176.35
No. 00011	9th October 2015	9 October 2050	172.80
No. 00012	9th October 2015	9 October 2050	171.52
No. 00013	9th October 2015	9 October 2050	176.59
No. 00014	9th October 2015	9 October 2050	175.46
No. 00015	9th October 2015	9 October 2050	57.52
No. 00016	23rd September 2015	23 September 2050	183.06
No. 00017	9th October 2015	9 October 2050	189.16
No. 00018	9th October 2015	9 October 2050	186.21
No. 00019	9th October 2015	9 October 2050	185.23
No. 00020	9th October 2015	9 October 2050	184.00
No. 00021	9th October 2015	9 October 2050	168.39
No. 00022	9th October 2015	9 October 2050	197.57
No. 00023	9th October 2015	9 October 2050	197.14
No. 00029	9th October 2015	9 October 2050	164.89
No. 00030	23rd September 2015	23 September 2050	158.88
No. 00031	9th October 2015	9 October 2050	169.58

PT Sariwana Adi Perkasa

Own Estate (5,096.86 Ha) based on Decree of the Head of the Indonesian Land Agency No. 164/HGU/BPN RI/2014 dated October 24, 2014 regarding the granting of *Hak Guna Usaha* (HGU) to PT SAP on state land covering an area of 5,096.86 Ha located in Sima Village – Yaur District and Wanggar Village – Yaro District, Nabire Regency, Province Papua, dated 24 October 2014. The HGU decree is valid for 35 years (until 24 October 2049). From the decree, here's the certificate:

- HGU Certificate No. 00001, dated 16 January 2015, for area 909.23 ha valid until 24 October 2049
- HGU Certificate No. 00002, dated 16 January 2015, for area 2,811.81 ha valid until 24 October 2049
- HGU Certificate No. 00003, dated 16 January 2015, for area 1,375.82 ha valid until 24 October 2049

Scheme Smallholders of PT Sariwana Adi Perkasa (1,297.32 Ha)

Based on Decree of the Head of the Indonesian Land Agency No. 164/HGU/BPN RI/2014 dated October 24, 2014 regarding the granting of HGU to PT SAP decided that the company must facilitate the development of community plantations (plasma) through a partnership on August 4, 2014, which is on an area of 1,297.32 Ha. Legal documents for Scheme smallholders are presented in the table below:

HGU Certificate No	Date Of Issue	Expiry Date	Ha
No. 00024	9th October 2015	9 October 2050	170.40
No. 00025	9th October 2015	9 October 2050	194.02
No. 00026	23rd September 2015	23 September 2050	195.13
No. 00027	9th October 2015	9 October 2050	197.02
No. 00028	9th October 2015	9 October 2050	194.67

No. 00033	9th October 2015	23 September 2050	172.81
No. 00032	24th September 2015	9 October 2050	173.27

The company also has other legalities permits such as plantation business permits which are contained in the following documents:

- PT Nabire Baru's business license revised through the Electronic Integrated Business Licensing service according to application Number I-202001011816318253588 dated 27 April 2022 which was approved by the Directorate General of Plantations, Ministry of Agriculture on 23 August 2022 with an area of 11,610.32 ha (KBLI 01262 and NIB 9120203340282).
- Revised PT Sariwana Adi Perkasa Business License through Electronic Integrated Business Licensing service according to application Number I-202106210726208271531 dated 8 August 2022, which was approved by the Directorate General of Plantation, Ministry of Agriculture on 23 August 2022 with an area of 5,096.86 ha (KBLI 01262 and NIB 9120004352262).

4.4.2, 4.4.4

The company has freed its management area from other rights and interests as shown in the stages of acquiring land rights to Nabire Matoa POM. All records are kept by the company in the form of hard and soft copies with appropriate language. Based on the results of document verification related to land acquisition and land compensation, in the Declaration of Release of Rights, it is explained that indigenous peoples surrender all their land rights in exchange for services in the form of money and provide guarantees to the company that they will not accept demands or claims from any party, including the heirs of indigenous peoples. The customary land handed over is declared not in a disputed condition, has never been traded or transferred directly or indirectly in an engagement, has never been certified and is not being used as collateral for debt. The agreement letter was signed by all landowners with witnesses from the Yeresiam Tribal Chief, the Sarakwari Tribal Chief, the Koroba Tribe Head, the Saramoi KSU Chair, the Yaur District Office Head, the Sima Village Head Office, the Nabire Indigenous Community Association Head and the Regency BPN Head. Nabire. From the verification, it can be concluded that the land acquisition process has been carried out with FPIC.

Based on the interviews with representatives of Sima Village, which are one of the previous land-owning villages, it is known that the land compensation process has been based on the agreement of both parties without any intimidation from any party.

4.4.3

The results of the consultation with the District BPN (*Badan Pertanahan Nasional*) also obtained information that the company's location was in accordance with the local RTRW (*Rencana Tata Ruang Wilayah*). The boundaries between customary lands are agreed upon during the process of changing land ownership, usually using natural boundaries or agreed boundaries such as; 1) River; 2) Big tree; 3) mountains; 4) capes. In order to avoid things that are not desirable, then for customary payments from the company to the tribes of the owners, PT NB and SAP have recorded the customary boundaries of each tribe of each village included in the work area. The boundaries will be poured into a map sheet and signed jointly by the heads of the tribes of each village and the company witnessed by the local government. The map covers an area of 20,528.45 Ha and a scale of 1:100,000.

4.4.5

The company tries to provide examples of latest land acquisition activities that have followed FPIC procedures, for example the company can show documentary evidence of land acquisition that has been carried out in the HGU area and signed by the Head of of the Yeresiam Gwa and Wate tribes district. From the evidence above, the community is not represented by any party in the land sale process and is witnessed by the relevant agencies.

4.4.6

Until now, the company has not reviewed the FPIC process related to land compensation because the entire process was completed before 2014. Regarding social relations, the company reviews social programs as informed in indicator 3.4.3

Status: Comply

4.5

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

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

Based on the results of the document review and explanation from the management, the company is currently still in the stage of clearing new land according to the NPP procedure with a total area of 3,110.7 ha starting from 2020. Currently the company is still waiting for a decision from the RSPO whether the NPP has been approved or not. The auditors also conducted field observations in

the area which is currently still in the NPP process, and it is known that the area is still in an unopened condition and there are no indications of land disputes in the field.

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

In order to conflict resolution, the company using land development preparation procedure no. SOP.EHS.NPP-01 2010 revised on 30 March 2016, land acquisition procedures on 22 September 2016 and SOP Land Clearing and Development No. LCD 2.1, on August 5, 2010. FPIC process is described in the procedure. The procedure compiled by management reference by local regulation.

Based on interviews with Representatives Sima Village, information was obtained that company plantation land originating from customary land rights. The customary land comes from customary land of Wate Asiaina Tribe and Yeresiam Gua Tribe where the Yeresiam Gua Tribe has four sub-tribe namely Akaba Sub-Tribe, Waoha Sub-Tribe, and Sarakwari & Koroba Sub-tribe.

4.6.2

Based on the management's explanation and a review of the land compensation procedure, the company always refers to the local government regulations and will update it in accordance with the existing office regulations in government.

Same as indicators 4.6.1 statement, the mechanism to identify and compensation procedure were carried out by forming team consisting of community leaders, company and government representative and price were determined based on negotiations.

4.6.3

Based on the results of the public consultation with the Sima Village, which is currently still in the process of partnership for plasma plantations, it is known that there is land ownership represented by women farmers. This proves that the company provides opportunities for women to become members of the plasma assisted by the company.

4.6.4

The land compensation process in the company area has been carried out in the early days of plantation clearing. Documents related to land compensation are kept at the General Manager Office and partially archived at the Plantation Unit Office. According to the available recorded evidence, it is known that the land compensation process was last carried out in 2012.

The auditor conducted an interview with the previous owner's representative on behalf of Sima Village, and the information contained no negative issues related to the land compensation process. The head of the hamlet also confirmed that there was no problem with the land compensation process by the company to his community.

That recorded evidence of land compensation is accompanied by a negotiation process, land documentation, proof of payment and also a map of the location of the area signed by both parties.

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

The procedure for compensation for the purchase of land is also contained in the new Land Development Preparation Procedure No. SOP.EHS.NPP-01 2010 was revised on March 30, 2016. The procedure also explains the identification, calculation and compensation for the loss of legal rights and traditional rights for each landowner who is entitled to be compensated.

4.7.2

The procedure also explains that the payment of compensation is fair without harming one party. Based on that procedure verification, that during the compensation process for growing plantings for community arable areas, the company carried out a mechanism of negotiation without coercion, joint measurement, deliberation on price fixing involving the relevant agencies and payments to the

direct owner or a designated group representative. The procedure has implemented FPIC principles, where the compensation process will not be carried out without the agreement of both parties. In the records held by the company, the land originates from customary lands as described in the previous assessment, namely customary land of Wate Asiaina Tribe and Yeresiam Gua Tribe where the Yeresiam Gua Tribe has four sub-tribes namely Akaba Sub-Tribe, Waoha Sub-Tribe, Tribe, and Sarakwari & Koroba Sub-tribe.

4.7.3

The company can show recapitulation of previous landowners who have been compensated. Compensation is only made for the area within HGU areas owned by the company and was completed. The certificate holder has no expansion area for new planting area (no compensation for area outside HGU).

Based on public consultation with village representatives from Sima Village, the communities that have lost access and rights to land also provided opportunities to benefit from plantation development such as benefit in the form of CSR program, become employee and become a contractor in the company.

Status: Comply

4.8

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

4.8.1, 4.8.2, 4.8.3 & 4.8.4

Currently there is no land dispute in the company's operational area. Related to previous conflict has been resolved, and has been stated on previous assessment, here's the detail:

The complaint based on RSPO complaint panel (<https://askrspo.force.com/Complaint/s/case/50090000028Es0JAAS/detail>), a series of meeting processes have been carried out by the company. From March 2017 until July 2018 the resolution process was supported by the Conflict Resolution Unit (CRU) of the IBCSD (Indonesian Business Council for Sustainable Development) under the framework of the RSPO Dispute Settlement Facility (DSF).

In July-August 2018, the Dispute Resolution Agreement was negotiated and agreed by representatives from the company and local communities. The signed agreement was notarized by Nabire Regency government officials on 9th August 2018.

In accordance with the obligations of the Dispute Resolution Agreement (August 2018), negotiations have resulted in the development of a Memorandum of Understanding for community engagement and empowerment. The Memorandum of Understanding: Corporate Social Responsibility (CSR) PT Nabire Baru (NB) was signed by representatives from company and community on 17th January 2019.

For now, based on public consultation with surrounding communities (Sima Village), there's no land conflict.

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1

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

5.1.1 5.1.2 & 5.1.3

Currently the company does not receive FFB from independent smallholders. The company only receives FFB from its nucleus plantations and smallholder scheme plasma plantations. The determination of the price of FFB to farmers (scheme smallholder) is determined by the Plantation Service of the Province of Papua. In determining the price of FFB, farmers are also involved. The determination of the FFB price is always known by the plasma farmers because every time there is an update on the FFB price, the company always provides information to the cooperative leadership to be informed to all its members. This is in line with the results of consultations with cooperative management who stated that information regarding the price of FFB is known every week.

5.1.4 & 5.1.5

The company can show the cooperation / MOU for Plasma Development between the company, here's the detail of agreement for each cooperation:

- MoU dated 19 September 2014 between PT NB and the Plantation Cooperative of the Wate Asiaina Tribe of Wanggar Pantai Village for the construction of a community estate covering an area of ± 872.73 ha. The management of plasma plantations is carried out entirely by the company (exclusive rights) for a period of 30 years. This MoU was followed up by the Plasma Estate Management Cooperation Agreement No. 28 dated 28 August 2015 and FFB Sale and Purchase Agreement No. 31 dated 28 August 2015. Both agreements were made before Notary Helien Somalay, S.H., MKn., in Jayapura.
- MoU dated 19 September 2014 between PT NB and the Plantation Cooperative of the Waoha Tribe of Kampung Sima for the construction of a community estate covering an area of $\pm 1,548.13$ ha. The management of plasma plantations is carried out entirely by the company (exclusive rights) for a period of 30 years. This MoU was followed up by the Plasma Estate Management Cooperation Agreement No. 30 dated 28 August 2015 and FFB Sale and Purchase Agreement No. 32 dated 28 August 2015. Both agreements were made before Notary Helien Somalay, S.H., MKn., in Jayapura.
- MoU dated 19 September 2014 between PT NB and the Akaba Kampung Sima Indigenous Community Plantation Cooperative for the construction of a community estate covering an area of ± 828.11 ha. The management of plasma plantations is carried out entirely by the company (exclusive rights) for a period of 30 years.
- MoU dated 19 September 2014 between PT SAP and the Sarakwari Tribe Indigenous Plantation Cooperative and Koroba Kampung Sima for the construction of a community estate covering an area of ± 951.27 ha. The management of plasma plantations is carried out entirely by the company (exclusive rights) for a period of 30 years. This MoU was followed up by the Plasma Estate Management Cooperation Agreement No. 28 dated 28 August 2015 and FFB Sale and Purchase Agreement No. 33 dated 28 August 2015. The two agreements were made before Notary Helien Somalay, S.H., MKn., in Jayapura.

For now, the cooperative under the name of Akaba Kampung Sima Indigenous Community Plantation Cooperative is still in the development process, this is also clarified from the results of the explanation from the community representatives of Sima Village.

From the results of the review of the agreement document, the document contains the rights and obligations of each party from the implementation procedure, payment process, price, scope of work, conditions for termination of employment, to the term of the agreement agreed upon and signed by both parties.

5.1.6

The company does not have a third party FFB supplier, regarding payments, the auditors verify the payment of the CPO carrier contractor. For the payment process, the certificate holder pays via money transfer to the contractor account. Based on interviews with representatives of CV Mitra Lintas Borneo, there were no negative issues related to payment. The company has also shown proof of FFB payment to the seller for the period July 2022, which is accompanied by proof of transfer along with the selling price which has been signed by both parties. There are no issues related to late payments, the supplier's why the price has been known transparently and there is no indication of harm to the supplier.

5.1.7

The company had 2 weighbridges on Palm Oil Mill, the weighbridge in good condition and functional. In addition, the certification unit showing certificate test result for each weighbridge, here's the detail:

- Calibration record Number 510.3-UPTD/107/X/2021 dated 7 October 2021 with a validity period until November 2022 for weighbridges type ZM 305 Tronix with serial number 182950846 from the Department of Commerce and Industry of Manokwari Regency.
- Calibration record Number 510.3-UPTD/108/X/2021 dated 7 October 2021 with a validity period until November 2022 for weighbridges type ZM 305 Tronix with serial number 191950223 from the Department of Commerce and Industry of Manokwari Regency.

For both calibration record, the third party stated the test results, *"Legally on 2021 according to the law of Republic Indonesia No. 2 of 1981 concerning Legal Metrology"*. With the calibration evidence, the company has shown evidence that the weighing equipment used to weigh FFB from outsiders is minus indications of fraud.

5.1.8

Based on the results of interviews with the representative Wate Wasiana Cooperative Village, which is an scheme smallholder Cooperative that supplies FFB to the company, it is known that the scheme smallholder has already RSPO certified. The company has a plasma program as described in indicator 5.1.4, and 3 out of 4 cooperatives already have an RSPO certificate.

5.1.9.

The mechanism of grievance its accordance with the group plantation of Goodhope holdings, which can be accessed on the page <http://www.goodhopeholdings.com/sustainability/grievances>. All complaints will be addressed in a timely manner according to our standardized Grievance Approach. The company aim to to ensure fairness and transparency throughout the grievance handling process.

Status: Comply

5.2

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

5.2.1; 5.2.2; 5.2.3; 5.2.4; 5.2.5

Based on the results of public consultations with surrounding communities, such as Sima Village, Wami Village, the company has contributed to the advancement of the welfare of the surrounding community by establishing a plasma plantation (scheme smallholder) program. The community has also acknowledged that they have benefited from the results of the plasma plantations. In addition, the community has also received socialization related to oil palm cultivation (including harvesting and pesticide handling) annually (latest on March 2022), but until now the community has not been interested in planting oil palm and from the results of auditor verification in Nabire Regency there is indeed no history of any community ever planting oil palm, so it takes time for the community to accept it. Related to the development of plasma plantations (KPMA Akaba) which are currently still in the process of NPP has been reviewed on social and environmental impacts reports in 2022.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1, 6.1.2 & 6.1.3

The company has a non-discrimination policy which is stated in Goodhope Asia Holdings LTD Sustainability Policy No. GAHL.SP.SUS.01 Revision 01 dated 25 June 2020 on the points:

Workers' Rights

The Company respect and promote all the principles and rights expressed in the international labor organization (ILO) Declaration on Principles and Rights at work and ILO fundamental Conventions:

- We recognize the right of our employees to join Associations and Unions and collectively make bids.
- We do not tolerate any form of forced, bonded or child labour.
- We prohibit discrimination and provide equality of opportunity and care in the occupations of the Occupation.

Based on the employee registration document, unit certification has provided equal opportunities and treatment in employment opportunities. In addition, in job vacancies that have been published by the company, there are no requirements that refer to discriminate against gender, race or ethnicity, disability, sexual orientation, age, or belief, so indirectly the certification unit has implemented a non-discrimination policy and also equal opportunity. This is evidenced by the diversity of ethnic accepted to work.

The results of interviews with workers (harvester, sprayer, and mill operator) during field visits in each unit, interviews with bipartite representative and representatives of the gender committee also obtained information that there was no indication of acts of discrimination based on religion, ethnicity, gender and regional origin in the process of accepting work.

The results of the employment document review prove that certification unit does not discriminate and treat all workers equally, the following is evidence that can be shown by the company:

- The composition of workers consisting of various ethnic groups, religions, gender and workers' origins. The existing workers do not only come from one area but come from several areas spread throughout Indonesia such as Java, Sumatra, Kalimantan and Nusa Tenggara.
- Recruitment of workers based on the results of selection, performance appraisal, ability, medical eligibility and expertise of workers. For example, upkeep worker and harvesting workers recruitment based on the results of the selection of job application files, results of health checks and results of interviews that based on procedure that certification unit owned.
- For now, most of the workers are migrant and local people that's have become the majority of workers in the operational scope

of the certification unit.

- Worker placement and training are carried out in accordance with their expertise / type of work, such as prospective sprayer workers are placed as sprayer workers and receive regular pesticide handling and management training.
- Women workers are given equal rights, wages and opportunities to get promotions with male workers of the same type of work, for example there are several upkeep foremen who are female workers.

Based on the results of interviews with workers (harvester, sprayer, and mill operator) at PT Nabire Baru and PT Sariwana Adi Perkasa, it is known that workers have never felt that the certification unit has discriminated against them since last year until now. This is because all activities from recruitment, performance appraisal, promotion, and union, each worker is given the same opportunity regardless of ethnicity, caste, nationality, religion, disability, gender, sexual orientation, gender identity, membership in trade unions, affiliations, politics, or age. There is no difference between the communication between superior and workers because of the things mentioned above, so that the workers do not feel isolated or discriminated against by the superiors. This has resulted in the absence of discrimination issues from last year to the present.

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

6.1.4

The unit of certification does not carry out pregnancy testing as a discriminatory measure in recruitment activities. With the existence of a non-discrimination policy that is approved by the company's leadership, every recruitment activity carried out is only in the form of ordinary health checks to ensure workers are in good health. For an explanation of pregnancy testing, it is explained below.

A pregnancy test for workers is carried out not every month, because the certification unit conducts pregnancy checks if the worker has experienced delays in the regular schedule of menstruation in the current month. If there are workers who experience delays, this must be checked for pregnancy at the nearest clinic or done independently. This case do for to ensure that pregnant workers are not allowed to do work with chemicals, not as a basis for discriminating against these workers. If declared pregnant, the worker will be transferred to a safer job but still equal in terms of wages and other benefits, so that there is no discriminatory action.

The statement above is made clear by the results of interviews with committee gender and female workers in PT Nabire Baru and PT Sariwana Adi Perkasa stating that female workers are required to have monthly pregnancy testing at the clinic to ensure that no female workers working with chemicals are pregnant / breastfeeding and testing the pregnancy is not a discriminatory measure given by the certification unit.

6.1.5

Gender committees have been formed and are still active until today in the certification unit which is chaired by the committee chairperson along with coordinators in several sections and there are representatives in each unit. The structure of the gender committee not only consists of female workers but also includes male workers. The main objective of forming a gender committee is to provide a forum that can accommodate the aspirations / complaints of workers (especially women), as company partners in carrying out the activities of socialization related to gender and other policies related to workers' reproductive rights. In carrying out its activities this gender committee always collaborates with the bipartite representative so that the socialization of matters related to women's rights can be conveyed properly and there is no discrimination in terms of gender.

The workers also knew of the existence of the gender committee because it had been routinely socialized by its management, the last socialization related to the gender committee (gender bias and equality) and for example the activity was carried out on 02 June 2022 which was attended by workers (male and female) and housing residents. The results of this socialization can be seen with the absence of differences in company operational activities such as promotional activities, the same status of workers without gender bias because overall are given equal opportunities for all genders (male or female) in work. In addition, there are work programs for the gender committee that include women's empowerment, such as the obligation to participate in assisting posyandu activities, participating in monthly recitation activities (for Muslims), religious studies (non-Muslims), management meetings to evaluate monthly issues, developing interest in / talent workers and others. This has become an improvement from the previous year where the gender committee was only known to exist but did not yet have a clear work program, while for now it has begun to be programmed and implemented well and evidence of its implementation is shown.

The results of interviews with upkeep workers (male and female workers) and representatives of the gender committee revealed that until now there were no reports / issues / complaints related to gender reported by the workers and at the moment the activities carried out were gender meetings, posyandu monthly and others. Currently the certification unit is more focused on gender bias and equality for women because the most vulnerable parties in plantation operational activities are women, but this does not mean that the company does not focus on other genders. This is evidenced by the absence of any issues or incidents related to this from last year until now.

6.1.6

Equal payment of wages has been made by certification unit properly, taking into account the ability, performance, expertise, length of work and other factors as a basis for remuneration. So that the payment of wages provided is in accordance with the burden / duties / types of work respectively. For example, estate and mill workers with Employee Number 820030086 (security – SKU-B), 820430084 (security – SKU-B), 820430080 (process operator – SKU-B), 920710023 (harvester – SKU-H), 83210559 (harvester – SKU-H), 819912378 (upkeep – SKU-H) and 819912561 (upkeep – SKU-H) who get wages in August and September 2022 whose value is above the minimum wage, but with different amounts based on years of service, ability, attendance and job performance (structure and scale wage). This is in line with statements from workers who were interviewed with types of work as harvesters, sprayers, upkeep, security and mill operators who have the same type of work but have different wage scales based on their performance, length of work in the company, productivity and other factors. From the previous explanation, it can be seen that the company has implemented a comprehensive wage scale structure and can be proven in documents and interviews with workers. This is one of the improvements made by the company from previous years, where all workers can feel the structure of the wage scale that has been set in accordance with their respective abilities, expertise and work results.

In addition, based on the results of review of structure and scale wage, it was found that the certification unit already has a wage scale structure for each worker based on position, class, work performance, and not based on gender differences or origins. For example, the lowest wage scale is for permanent worker with class SKU-H and the highest wage is permanent worker with class Senior Manager.

The results of interviews with workers (harvesting, spraying and mill operators) in PT Nabire Baru and PT Sariwana Adi Perkasa note that workers already know that there is a wage scale structure for each level of workers and this has been proven by the difference in the monthly wage income presented on the pay slip. The monthly wages received are in accordance with the grade owned by each worker and so far there have been no complaints / errors regarding this matter.

Status: Comply

6.2

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

6.2.1

The company has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Company Regulation period 2021-2023 written in Bahasa. This Company Regulation explains the working conditions and rights / obligations of workers such as, recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, overtime, and other provisions. These procedures have been documented to all workers and their representatives. The company has given all of its employees socialization related to Company Regulations when they first joined work. There is also evidence of socialization of important points of company regulations that are posted on information boards in every estate office or mill related to it to ensure that it is easier for workers to get information. This is in accordance with the results of interviews with harvester, upkeep, spraying workers and process operators who stated that the workers had received socialization related to Company Regulations, received socialization of Company Regulation for workers who first joined and there is information listed on the information boards of each office.

The company doesn't have workers with contract status (PKWT or BHL) in all unit. For the other employee status is Regular Workers (SKU-H & SKU-B) and Staff (above assistant class). All the rights for each employment status have been distinguished.

The results of interviews with workers (harvesters, sprayers, fertilizers and mill operators) and bipartite representatives know that workers have a sufficient understanding of their rights (wages, overtime, incentives, fines, etc.) listed in the Company Regulation and in accordance with routine socialization provided by the certification unit. Workers' wages in August and September 2022 have been

above the minimum wage set by the government, wage based on years of service, ability, attendance and job performance (structure and scale wage) and there are no late payments every month.

A review of the August and September 2022 wage document for harvest workers, pesticides, sprayers and mill operators proves that the wages received are above the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2022. For example, workers wages with the Employee Number 820030086 (security – SKU-B), 820430084 (security – SKU-B), 820430080 (process operator – SKU-B), 920710023 (harvester – SKU-H), 83210559 (harvester – SKU-H), 819912378 (upkeep – SKU-H) and 819912561 (upkeep – SKU-H) have a different based on wage scale structure 2022.

Based on the above explanation it can be concluded that the workers have understood the work requirements that have been socialized by the company in an understandable language.

6.2.2 & 6.2.3

The company has Company Regulation are made in a Bahasa that explains the working conditions and rights / obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, working hours, remuneration, discipline, deduction, overtime, sick leaves, holiday entitlement, maternity leave and other provisions. Explanations related to the contents of the Collective Labor Agreement include:

- Employee Acceptance (recruitment, selection, transfer, promotion, performance appraisal) which explains that all workers wishing to join the company must follow the specified requirements including: being over 18 years old, having a health certificate, taking a selection exam, and other requirements.
- Working Time which explains that there are 2 types of working time in the company, namely by working 8 hours per day or 5 working days in a week and 7 hours per day or 6 working days in a week, in which the total working hours are 40 hours in a week.
- Wages which explains the wage that cannot be lower than the minimum wage set by the government every year, granting rice allowance to all workers according to its calculation, and other explanations.

In addition to being generally stated in Company Regulation, the certification unit also has a decree, policy, memorandum and work contract for workers in orientation period that specifically explain these matters. An example is:

- Internal Memo No. 007/AHL-SPU/HR/XII/2021 concerning Minimum Wage Determination in 2022 is IDR 3,561,932/ month (minimum) determined based on Province Sectoral Minimum Wage Determination in 2022.
- Decree of Papua Governor in September 2021 about the Papua Minimum Wage in 2021.
- Decree No. 013/NB-HR/SK-SSU/II/2022 dated January 21, 2022 regarding the Wage Structure and Scale of PT Nabire Baru in the period of 2022 (January-December) determined based on each position with a wage range from the lowest to the highest wage . For now, there are 10 types of positions ranging from SKU-H, SKU-B, Assistant, and others. For now, the lowest wages are for SKU-H workers (because PKWT workers no longer exist) who have just joined for less than 1 year with wages equal to the minimum wage, while the highest wages are in the Senior Manager position with the Highest Wage salary column.
- Decree No. 014/SAP-HR/SK-SSU/II/2022 dated January 21, 2022 regarding the Wage Structure and Scale of PT Sariwana Adi Perkasa in the period of 2022 (January-December) determined based on each position with a wage range from the lowest to the highest wage . For now, there are 10 types of positions ranging from Daily PKWT, SKU-H, SKU-B, Assistant, and others. For now, the lowest wages are for SKU-H workers (because PKWT workers no longer exist) who have just joined for less than 1 year with wages equal to the minimum wage, while the highest wages are in the Senior Manager position with the Highest Wage salary column.
- August and September 2022 salary slips with the Employee Number 820030086 (security – SKU-B), 820430084 (security – SKU-B), 820430080 (process operator – SKU-B), 920710023 (harvester – SKU-H), 83210559 (harvester – SKU-H), 819912378 (upkeep – SKU-H) and 819912561 (upkeep – SKU-H) have a different based on wage scale structure 2022 and all wages above the minimum wage.
- Overtime payment in August and September 2022 that has been accordance with applicable laws for workers with Employee Number 820030086 (security – SKU-B), 820430084 (security – SKU-B), and 820430080 (process operator – SKU-B).
- Unit certification has provisions related to deduction / penalty which have been stated in the Company Regulation and further explanation is set out in an internal memo.
- In the payroll document, there is information that states the results of the worker's wages in one month according to the work performance of each worker. Payroll has also been accurate for each worker, for example the number of days worked in a month, premium payments, fines, deductions from workers' wages and other information that is in accordance with facts in the field.
- Etc.

Since 2021-2022 there has been no change in policy, but what has changed is the decision related to the minimum wage which has changed every year following the government's decision. Regarding the change in the minimum wage decision, it has been routinely submitted annually to workers at the beginning of the year and this is reinforced by the results of interviews with field workers and trade bipartite representatives who are clear about any changes in the minimum wage every year. Based on the description above, the certification unit has demonstrated legal compliance related to working conditions, such as compliance with minimum wage, working hours, overtime, maternity leave and other compliance.

The results of interviews with workers (harvesters, sprayers, and mill operators) and bipartite representatives know that workers have a sufficient understanding of their rights (wages, overtime, incentives, deductive, fines, etc.) listed in the Company Regulation and in accordance with routine socialization provided by the certification unit. Workers' wages in August and September 2022 have been above the minimum wage set by the government and there are no late payments every month, working hours is forty (40) hour a week with 6 days in a week and for the overtime has been paid in accordance with applicable regulations.

A review of the August and September 2022 wage document for harvest workers, pesticides, sprayers and mill operators proves that the wages received are above the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2022. For example, workers' wages with the Employee Number 820030086 (security – SKU-B), 820430084 (security – SKU-B), 820430080 (process operator – SKU-B), 920710023 (harvester – SKU-H), 83210559 (harvester – SKU-H), 819912378 (upkeep – SKU-H) and 819912561 (upkeep – SKU-H) have a different based on wage scale structure 2022 and all wages above the minimum wage.

In the previous assessment, there was a note related to the existence of workers without work ties and the presence of workers who brought their families to work in the company's operational area due to cultural differences between workers, most of whom came from Eastern Indonesia and Papuans. In 2022, the company has begun to approach the workers and their families quite well and the result is that employee retention has begun to improve since being fostered by the company. Guidance is carried out by conducting regular outreach activities related to the company's policy of not bringing family/workers without work ties in the company's operational environment as well as adding warnings at several locations in housing and estate. In addition, when the audit activity was carried out, the audit team did not find any workers who still brought their families/workers without work ties to work in the company's operational area, the workers were also able to explain/understand quite well the existing policies in the company including the prohibition. In addition, the results of interviews with foremen revealed that every day workers were absent according to their respective work locations and if there were workers who brought their families or workers without work ties, they would be given warnings and sanctions if found repeatedly. From this explanation, the company has made improvements quite well from the previous assessment regarding this matter.

6.2.4

The certification unit has provided welfare facilities to occupants in the form of housing, clinics, water supply, electricity, education, transportation and other facilities. The results of the field visit in the housing area revealed that workers were provided with adequate housing facilities with 2 bedrooms, 1 bathroom and there was daycare for children. The house is inhabited by 1 family and specifically for workers who are not married then 1 house will be filled by 2 workers. This is in line with the results of interviews with housing residents stating that the facilities provided by the certification unit are houses, electricity, availability of clean water, transportation, child daycare, places of worship (mosque & church), sport facilities and others. In general, the facilities provided by the certification unit are good / suitable for use by workers and their families. The certification unit has also conducted monitoring for the condition of the feasibility of the facilities provided every year, such as housing that is repaired if there is damage (usually if there is damage the worker will inform it and it will be handled directly by the repair company), the availability of electricity that has been provided by the company in the form of a generator from mill, and the availability of clean water which is always monitored for its feasibility every 6 months (the results of monitoring clean water in the residential area do not show any test parameters that exceed the threshold).

In the previous assessment, there were notes related to housing facilities that still had shortcomings in the form of the absence of water facilities that were directly accessed in each house and the arid/hot housing conditions. This has been corrected by the company by doing the following:

- For housing that does not have direct access to water needs/does not have its own bathroom, the company provides 2 units of public bathrooms (2 men and 2 women) to serve as temporary facilities before the housing is replaced with semi-permanent housing. This happened because the previous housing condition was barracks (wooden) type housing with one building that had

10 house doors and still did not have its own bathroom, but since 2022 until 2025 it has been planned and approved in the Long-Term Budget 5 year that the change of the Barracks house into a Semi-Permanent House has been approved. Evidence from the program starting to be realized is that in 2022 there have been 8 new semi-permanent houses added and still progressing until 2025, where the target is that by that year all houses have become semi-permanent. The results of interviews with workers also obtained information that the workers were aware of the plan and did not complain again about the lack of these facilities.

- For arid/hot conditions in housing areas, the company has planted lush plants in each housing location, but it must wait for the process to develop and grow before the trees can grow and make housing conditions cooler.

The results of these improvements made housing conditions and workers not complain about housing conditions that were still lacking because it was known that everything had been well planned and gradually realized.

Based on the explanation above, it can be concluded that the certification unit has provided facilities and infrastructure for the welfare of workers with decent conditions and still functioning well.

6.2.5

Certification unit has made it easier for workers and their families to obtain food sources by providing employee cooperatives that sell the daily needs of workers and provide access to vegetable traders to sell in the workers' housing area. In addition there are also workers who open small business stalls to sell daily necessities in each housing.

Based on interviews with workers (harvesters, sprayers, maintenance and mill operators), housing residents, bipartite representative and gender committees, it is known that workers have no difficulty in getting food sources because the company has provided cooperatives that sell daily necessities and the existence of vegetable sellers given access to sell at home. In addition, workers can buy these needs into markets around the area of the company with less difficult access.

6.2.6

In Indonesia there is no set standard of living wage, so the certification unit still applies the national minimum wage for all workers. In addition to the payment of the minimum wage, the unit of certification has an assessment of the implementation of applicable wages and benefits in kind provided to workers in the unit of certification which are in line with the RSPO Guidelines for Implementing Living Wages.

The certification unit has the determination of assessment prevailing wage and all kind of benefits for DLW simulation in 2022 has been included in the calculation of main wage, worker status, housing facility, education, electricity, water sources, healthcare and others. The results of these calculations are known that the standard of DLW currently given / simulated by the certification unit is above the stipulation of the minimum wage with scale of minimum.

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

6.2.7

Based on the results of the study of labor documents and the list of workers in September 2022, it is known that currently the company no longer has workers with contract status such as PKWT and PHL. Currently all workers working in the company are permanent workers (SKU-H, SKU-B and Staff). This is also consistent with the results of interviews with plantation workers (harvesters, sprayers and fertilizers) and factories (process operators) who stated that currently all workers are permanent workers and there are no longer any workers with PKWT or PHL status.

Status: Comply

6.3

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

6.3.1

The company has a policy regarding freedom of association which is stated in Goodhope Asia Holdings LTD Sustainability Policy No. GAHL.SP.SUS.01 Revision 01 dated 25 June 2020 on the points:

- **Freedom of Association**

Employees should have the freedom to join any form of Association and the company will not interfere in any way that might hinder workers from exercising their Union rights. In cases where the law restricts workers' rights to freely associate and collectively bargain, we will work to identify and provide comparable means of linking and bargaining in accordance with the law.

- **Workers' Rights**

We respect and promote all the principles and rights expressed in the international labor organization (ILO) Declaration on Principles and Rights at work and ILO fundamental Conventions:

- ❖ We recognize the right of our employees to join Associations and Unions and collectively make bids.
- ❖ We do not tolerate any form of forced, bonded or child labour.
- ❖ We prohibit discrimination and provide equality of opportunity and care in the occupations of the Occupation.

The implementation of this policy is by forming a Bipartite Committee. The document is published in Bahasa which can be understood by all employees. In addition, the certification unit has a Company Regulation which states that employees have the right to establish labour unions and become members / leaders of trade unions in accordance with applicable regulations.

Based on interviews with bipartite representatives who explained that currently the company does not yet have a labor union, this is because the turnover of workers who work in the company is quite high and the awareness of workers to form a union is not yet owned. Therefore, the company has established a Bipartite Committee is in accordance with the applicable laws and regulations and has been recorded at the Manpower Office. The company is giving freedom for workers to express their opinion and also, did not give any intervention related to bipartite activity, but together with worker representatives to organize the activities so far. Bipartite Committee has registered to Manpower and Transmigration Agency of Nabire Regency in 06 April 2022.

6.3.2

The company has a list of workers who have joined the bipartite totaling 37 workers. In addition to properly documenting the list of members, the certification unit also has records of meetings between workers and management representatives. The following are examples of records of meetings conducted by bipartite Committee in 2022. For examples:

- Bipartite Committee Meeting on 28 September 2022 which was attended by 12 participants. The meeting discussed discipline at work where there are still many workers who have not obeyed their obligations to work 6 days a week, especially for workers in the plantation and this will be socialized again on a regular basis to always remind workers the importance of discipline.
- Bipartite Committee meeting on 23 July 2022 which was attended by 28 participants. The meeting discussed 2 topics of discussion, namely socialization related to excess overtime hours at the mill and mutual agreement regarding overtime hours at the mill. The result of the meeting was that the company conducted socialization to workers related to overtime and agreed on overtime hours at the mill so that workers would no longer be mistaken about this.

Based on the results of interviews with bipartite representatives and their members who are workers in each unit, it is known that the bipartite holds meetings every month with those accommodated in meetings between worker representatives and management representatives and since 2020 until now there has been issue that exists has been resolved by deliberation in the bipartite meeting which is held every month. This is also supported by the results of a review of worker complaint documents, it is known that the existing issues are only complaints related to the lack of supporting facilities, but this has also been continuously improved by the company to be better.

6.3.3

In establishing the Bipartite Committee, the company does this by means of deliberation and together with the workers to determine who will later be elected as representatives of each party (workers and employers) and will then be registered with Manpower Agencies. The election process in this formation, workers are given full freedom, this is evidenced by the results of interviews with workers who are members of the Bipartite Cooperation who stated that the company only chose representatives from the employer side while workers were given the freedom to choose their respective representatives. The result is a balanced number of representatives of workers and employers in the Bipartite Committee, while for the current period the chairman of the bipartite is still from the employer and this is based on the results of the previous deliberation.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1, 6.4.2, 6.4.3 & 6.4.4

The management unit has a policy on child protection including the prohibition of child labor as described in Goodhope Asia Holdings Ltd Sustainability Policy No. GAHL.SP.SUS.01 Revision 01 dated 25 June 2020 on the points:

Workers' Rights

The Company respect and promote all the principles and rights expressed in the international labor organization (ILO) Declaration on Principles and Rights at work and ILO fundamental Conventions:

- We recognize the right of our employees to join Associations and Unions and collectively make bids.
- We do not tolerate any form of forced, bonded or child labour.
- We prohibit discrimination and provide equality of opportunity and care in the occupations of the Occupation.

In addition, it is also stated in the employment contract with the contractor, for example in clause A concerning Provisions Regarding Manpower, it is explained that as follows:

- No. 8 "In the event that the Contractor employs foreign personnel under these Terms and Conditions and General Obligations, the Contractor shall ensure that all personnel who are hired/employed by the Contractor have appropriate and valid work permits issued by the competent authority, and prepare a copy of such permits if applicable required by the company.
- No. 9 "The contractor will not employ workers/employees/contractors/agents/representatives under the age of 18 years".
- No. 10 "Contractors will not employ workers by force or employ workers/employees/contractors/agents/representatives under pressure.

The results of the verification of documents revealed that there were no workers under the age of 18. In addition to having a policy governing the minimum age for workers for workers, the certification unit also includes clauses on child protection and prohibitions on hiring workers under the age of 18 in any agreement with the contractor. The policy was socialized to all workers and to the contractor when signing the work agreement.

Based on field visits and interviews with workers in the fields of PT Nabire Baru dan PT Sariwana Adi Perkasa, it is known that the minimum age for work is 18 years, and no workers found below the minimum age specified. This is supported by the results of a review of company and contractor workers' document which proves that there are no workers under the age of 18 at the time of entering work, the youngest age of workers is 18 years and three month when entering work.

Based on the results of the review of the cooperation agreement document with the contractor for the transportation of CPO with CV Mitra Lintas Borneo, it is known that in The agreement has a separate clause to ensure that the contractor does not employ minors (under 18 years old) and complies with the prevailing laws and regulations in Indonesia.

Based on this, it can be concluded that the company has a policy on child protection including the prohibition of child labor and has been well documented and known to all workers.

Status: Comply

6.5

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

6.5.1, 6.5.2 & 6.5.3

The management unit has a written policy regarding the prohibition of forced labor and or slavery which is contained in Goodhope Asia Holdings Ltd sustainability policy No. GAHL.SP.SUS.01 Revision 01 dated June 25, 2020 on the point of Prohibition of Forced, Bonded, and Child Labor. "We do not tolerate any form of forced, bonded or child labour, or any form of abuse, harassment or violence."

Based on interviews with workers and gender committee, the policy had disseminated to workers through gender committee meetings with workers and in the last year period, that hasn't any issue/incident related to sexual harassment, violence at work/reproductive rights. Based on the field visit to the housing complex show that to accommodate the needs of young mothers in breastfeeding, breastfeeding corners have been provided in the office area and child care area as well as the procurement of goods for the needs of the baby/mother. Currently the company has several new mothers whose needs have been identified. This is based on the results of a review of documents identifying the presence of pregnant and lactating women in 2021-2022. From the results of the identification, the company has determined the needs of new mothers such as providing breastfeeding areas in the office and daycare, posyandu for healthycheck for mother and baby, providing new mothers' needs such as milk, baby diapers, baby food, ASI booster, vitamin and other necessities provided at Matoes Mart. Based on this, the company has made improvements from the previous year regarding the

needs of new mothers which have been gradually added and fulfilled.

6.5.4

The company has a Right to complain policy which is described in Goodhope Asia Holdings LTD Continuing Policy No. GAHL.SP.SUS.01 Revision 01 dated 25 June 2020 on the Right to Complaint Points which states "We respect every claim and justified right of rights holders and will respond to complaints in a fair, responsible and consistent manner, which enables the stakeholders to disclose with interested parties to find solutions and reach an agreed settlement."

In addition, the company has several other supporting procedures related to complaints, namely:

- Document No. SOP-CSR-08 (Rev. 02) dated 20 June 2020 regarding Handling of Grievances and Complaints. This procedure refers to Law no. 7 of 2012 concerning the handling of social conflicts as well as the implementation rules, and others. Complaints can be made in person or online (email link for complaints at the national level to the Sustainability Division is available). The process of verification and classification of complaints is carried out within 14 working days from the receipt of the report. While the handling of cases will be carried out with a maximum time of 1 year. If it is not resolved, then mediation will be carried out with a third party with a maximum period of 3 years, or an extension as necessary.
- Document No. IMS.P-05 (Rev. 04) dated 04 May 2015 concerning Communication, Participation and Consultation. The procedure explains that complaints can be submitted formally or informally and recorded in the "Book of Communication and Request for Information". Complaints will be responded to a maximum of 14 days from the time the report is received.
- Circular No. 006/HR-RO/V-2011 dated May 4, 2011 regarding Guidelines for Handling Complaints. Employee complaints must be responded to and corrected within 3 days. In addition, a Complaints Hotline service is provided via WhatsApp (WA) and short message service (SMS) numbers. Complaint submissions through this method are completed within 33 days. The socialization related to the online system to the PIC will be held on January 8, 2021.

The procedure aims to accommodate complaints and grievance from employees. In the procedure described that if requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).

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

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1 & 6.6.2

There are no migrant workers who work in the company'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 company regulations, collective labor agreements, and in work agreements. Based on employee list and observation in field known that there are no migrant workers, forced labor. Every worker has a work agreement that describe specific job description, there is no substitution of contract without prior consultation and agreement from the worker, for example:

- There is no retention for identity, because all labor documents for individuals are in the form of photocopies and not original items such as ID cards, diplomas, family cards and others.
- There is no contract substitution, because all existing contract workers currently work in accordance with existing contracts such as contract workers for maintenance activities only doing maintenance activities and do not employ workers other than those stated in the contract.
- The freedom of workers in resigning, because if the worker wants to resign there is no understanding or prohibition from the company to the worker concerned. This is evidenced by the presence of workers who resigned to move to work and the company gave all their rights as fully resigned workers without any shortcomings.
- There is no coercion in doing overtime work, workers who do overtime at the company can refuse if ordered to do overtime activities because overtime is not the worker's obligation and the company also does not prohibit this.

Based on employee data and interview with workers, most of the workers came from local communities. They have the recruitment process in the company and is in accordance with applicable employee acceptance procedures. Based on the results of interviews with workers in plantation and mill, it is known that currently there are no migrant workers, retention of identity, payment recruitment

fees, contract substitution, involuntary overtime, lack of freedom of workers to resign, penalty for termination, debt bondage, and withholding bondage. This is because the certification unit has carried out its operations in accordance with applicable regulations.

There are no significant obstacles related to employment or violations of company regulations. For example, for the harvesters works daily based in 7 working hours. Certification unit provides output targets that can be obtained in less than 7 hours of work. If the harvester obtains more output within or more than 7 working hours, then the harvester will get the harvest premium payment. No penalty is given to the harvester if it does not get output due to natural factors such as rain. Based on payment list, the harvesters have earned above the minimum wage.

Status: Comply

6.7

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

6.7.1

The unit of certification shows the decree for the approval of the *P2K3* team by the relevant agencies in accordance with *P2K3* personnel, which are as follows:

- PT Nabire Baru
The decree for the approval of the *P2K3* team is stated in the decree of the *UPTD* of the Papua Province Labor Inspection Center number 560/04-64/WASNAKER/2021 on November 9th, 2021 concerning the Ratification of the Committee for the Development of Occupational Health and Safety (*P2K3*) at PT Nabire Baru. With the composition of the Occupational Safety and Health Development Committee (*P2K3*) consisting of:

Company Name	:	PT Nabire Baru
Address	:	Wami Village, District Yaur, Nabire Regency - Papua
Type of business	:	Oil Palm Plantation
Advisor	:	Vinoth Arumugan (GM)
Chairman	:	Novrianto Zulhery (Estate Manager)
Secretary	:	Afriyadi Budi Kusyanto (EHS Dept/OHS Expert)
Members	:	14 members representatives from all part of the department

- PT Sariwana Adi Perkasa
The decree for the approval of the *P2K3* team is stated in the decree of the *UPTD* of the Papua Province Labor Inspection Center number 560/05-64/WASNAKER/2022 on August 18th, 2022 concerning the Ratification of the Committee for the Development of Occupational Health and Safety (*P2K3*) at PT Sariwana Adi Perkasa. With the composition of the Occupational Safety and Health Development Committee (*P2K3*) consisting of:

Company Name	:	PT Sariwana Adi Perkasa
Address	:	Wami Village, District Yaur, Nabire Regency - Papua
Type of bussiness	:	Oil Palm Plantation
Advisor	:	Kajeswaran Subramanian (Senior Estate Manager)
Chairman	:	H. Agustinus Barus (Estate Manager)
Secretary	:	IG Septrialdy Saleda Mali (EHS Dept/OHS Expert)
Members	:	14 members representatives from all part of the department

Then the certification unit shows documents related to the appointment of *P2K3* secretaries for PT Nabire Baru and PT Sariwana Adi Perkasa, which are as follows:

- Secretary on behalf of Afriyadi Budi Kusyanto for PT Nabire Baru has attended the General OHS Expert Training for the Indonesian Ministry of Manpower Certification which was held on October 22nd – November 3rd, 2012 with *PJK3* organizers. The certification unit shows decree number 5/16560/AS.02.04/XII/2021 regarding General OHS Expert Appointment, dated December 17th, 2021. In addition, the certification unit shows an OHS Expert Authority Certificate (General OHS License) with Reg. 3716/PK3/AJ/31/2021/P3 which is valid until December 17th, 2024.
- Secretary on behalf of IG Septrialdy Saleda Mali for PT Sariwana Adi Perkasa has attended the General OHS Expert Training for the Indonesian Ministry of Manpower Certification which was held on July 18th – August 1st, 2022 with *PJK3* organizers. The unit of certification shows a certificate on August 1st, 2022 signed by the Director of *PJK3* stating that the decree can be used

properly until the Certificate, *SKP* and OHS License Card are issued from the Ministry of Manpower of the Republic of Indonesia.

P2K3 meetings have been held regularly every month with discussions on OHS issues and their follow-up, for example the *P2K3* meeting on August 31st, 2022 whose agenda was to discuss reviews of the previous meeting agenda, discussion of accident investigations, discussing non-conformance issues and follow-up actions.

The results of the interview with the Manpower and Transmigration Office of Nabire Regency, it is known that the *P2K3* structure of the certification unit has been ratified by the relevant agency in accordance with the legislation.

From the description above, it can be concluded that the certification unit has established an OHS organization with an adequate number of personnel in accordance with the laws and regulations and has recorded every meeting agenda periodically.

6.7.2

The unit of certification has procedures related to emergency response, including:

- Hazard Identification and Environmental Aspects and risk assessment (IMS.p-01) dated May 4th, 2015
- Emergency Preparedness and Response (IMS.P-08) dated May 4th, 2015
- First Aid for Accidents (SOP.EHS.ERP-01) Revision 2 dated July 7th, 2018
- Accident Emergency Response (SOP.EHS.ERP-02) Revision 1 dated July 11th, 2018
- Fire and Spill Emergency Response (SOP.EHS.ERP-03) Revised 1 July 11th, 2018
- Personal Protective Equipment (SOP.EHS.APD-01) dated July 13th, 2018
- Environmental, Health and Safety Inspection (SOP.EHS.INS-01) dated July 14th, 2018

In summary, it is known that OHS procedures have covered such things as the implementation of emergency response, monitoring its implementation as well as handling emergencies and work accidents. These procedures are available in Indonesian and have been socialized to all parties, including shown in the Environmental, Safety and Health Briefing document for employees/workers, contractors and visitors. For example, the socialization was held in the BNE Division 1 unit on April 20th, 2022, and was attended by 64 people. Then, when the auditor carried out a field visit to the Nabire Matoa Factory, the EHS team conducted a socialization related to safety briefing before entering the mill area and provided PPE in the form of helmets, vests, safety shoes and earplugs.

The unit of certification shows the Emergency Response Structure documents for PT Nabire Baru and PT Sariwana Adi Perkasa in 2022, which are as follows:

- PT Nabire Baru's Emergency Response Structure consisting of the Head of the Emergency Response Team (TTD), Commander of TTD Mill, Commander of TTD Plantation, Coordinator of Emergency Response Support Team, Head of RTD Mill and Plantation and Support Team. In addition, the certification unit also shows the Emergency Response Team Structure for each unit (BNE, SWE, KBE, CWS and NMM) consisting of the Emergency Response Team Leader, Emergency Response Team Commander, Emergency Response Core Team and Emergency Response Support Team.
- PT Sariwana Adi Perkasa's Emergency Response Structure consisting of the Head of the Emergency Response Team (TTD), the TTD Mill Commander, the TTD Plantation Commander, the Coordinator of the Emergency Response Support Team, the Head of the Mill and Plantation RTD and the Support Team. In addition, the certification unit also shows the Emergency Response Team Structure for the SSE unit consisting of the Emergency Response Team Leader, Emergency Response Team Commander, Emergency Response Core Team and Emergency Response Support Team.

Then, the certification unit also shows proof of participation in first aid training, for example as follows:

- Employee certificate with initials WAS. Workers have attended first aid training on February 2nd – 4th, 2019 and meet the requirements as first aid workers in the workplace.
- Employee certificate with initials IGSSM number 5/2954/AS.02.00/VIII/2020. Workers have attended first aid training on July 23rd – 25th, 2020, and meet the requirements as first aid workers in the workplace. In addition, the OHS License of first aid has been shown with the reg number: 10654-P3K/VIII/2020 which is valid until August 3rd, 2025.

In addition, the certification unit has first aid kits in the workplace spread over several locations such as warehouses, security posts, offices, factories, workshops and is held by the foreman. From the results of the review of the first aid box stock checklist document, information was obtained that the list in the first aid kit consists of 21 items and the monitoring is carried out once a month. Based on interviews with the harvest foreman in all estate unit, for example in the SSE Division, it is known that the contents of the first aid kit are in accordance with the potential hazards that arise in their respective fields of work. For example, in the harvest foreman's first

aid kit there is *aquades* and gauze that will be used as first aid if a harvest worker is bitten by a snake. The harvest foreman also stated that he had attended first aid training activities carried out by the company, so that he knew how to provide first aid to workers who were bitten by snakes, namely by washing the snake bite with *aquades*, covering the bite area with gauze, keeping the snake bitten area lower than the heart and immediately bringing the victim to the clinic.

6.7.3

The certification unit shows documents related to the provision of PPE in the SOP document for Personal Protective Equipment with the number SOP.EHS.APD-01 Revision 01 dated July 13th, 2018 which was approved by the Director of Sustainability. In the guidelines it is stated that for PPE that has been damaged or has expired, it must be replaced immediately.

In the context of implementing these regulations, the certification unit provides adequate Personal Protective Equipment (PPE) in accordance with its designation for each worker, which are shown as follows:

- PPE handover form on June 9th, 2021. PPE in the form of helmets, shoes and gloves have been given to loader workers (transporting FFB) in the KBE Division 1 unit.
- PPE handover form on June 5th, 2022. PPE in the form of helmets and shoes has been given to harvest workers in the BNE Division 2 unit.
- PPE handover form on October 8th, 2021. PPE in the form of aprons, masks, rubber gloves and goggles has been given to spray workers in the SWE Division 3 unit.
- PPE handover form on October 10th, 2022. PPE in the form of aprons, shoes and gloves has been given to fertilizer workers in the SSE unit

The results of interviews with FFB transport workers in Block M25, Division 1 of the BNE unit explained that workers have been given PPE by the certification unit within a period of 1-2 times a year. When the PPE is damaged before the specified replacement frequency, workers can request replacement by bringing the old PPE as evidence and getting new PPE according to the approval of their respective superiors. The auditor also carried out field observations to several activities/works throughout the estate related to the application of the use of PPE, it was found that all workers encountered in the plantation had used PPE in good condition. Workers can also understand the mechanism for replacing PPE if PPE is damaged/lost because it is routinely socialized by the company or notified through the foreman during the morning circle.

The auditor made field observations in the material warehouse, it was known that the certification unit had provided spare PPE, including shoes, masks and helmets. The certification unit also shows updated PPE stock data in September 2022, the document explains the type and amount of PPE stock in each unit. In addition, based on the results of field visits in all estate units (BNE, SWE, KBE and SSE), it is known that the certification unit has provided sanitation facilities (rinse houses) for workers who use pesticides to be able to remove PPE, clean themselves and put on their personal clothes. Based on the results of interviews with spray workers in Block K13, Division 2, it is known that all spray workers will change their clothes at rinse houses after work to avoid exposure to chemicals.

6.7.4

The company have Company Regulation that describe about workers have the right to receive medical care and be protected by the accident insurance company. The management unit show proof of payment of BPJS. Payments are made every month by percentage according to the regulation. The last payment that has been paid by certification unit is on 14 October 2022 for “*BPJS Ketenagakerjaan*” period of September 2022 and on 13 September 2022 for “*BPJS Kesehatan*” period of September 2022. All proof of payment shown and payment details for the “BPJS Health and Employment” program are in accordance with the current actual conditions / in accordance with the number of existing workers.

Based on the interview with PT Nabire Baru and PT Sariwana Adi Perkasa workers, concluded that all employees were aware of the medical service procedures in the event of an accident or illness. All employees interviewed also claimed to have a health BPJS card, if they went to a company clinic there was no fee at all. Based on interview with contractor representative, it is known that the accident insurance for contractor's workers is covered by the head of contractor itself.

6.7.5

The certification unit has carried out monthly LTA calculations listed in the Plantation Land development Progress Report. For example, the results of the LTA calculation for the August 2022 period are as follows:

- PT Nabire Baru

	Month	Year to Date (April – September 2022)	Year to Date – Last year
No. of reportable accidents	4	23	8
Lost time	8	47	194
Safety Index	3.37	4.21	6.62
Best achieved Zero LTA (Days)	18	73	-74

- PT Sariwana Adi Perkasa

	Month	Year to Date (April – September 2022)	Year to Date – Last year
No. of reportable accidents	-	1	-
Lost time	-	2	-
Safety Index	-	3.50	-
Best achieved Zero LTA (Days)	26	118	120

From the data above, it is known that work accidents in August 2022 at PT Nabire Baru were 4 minor work accidents with a lost time of 8 days, a safety index of 3.37 and the days without work accidents (best achieved zero LTA) was 18 days. Meanwhile, at PT Sariwana Adi Perkasa there were no work accidents with the number of days without work accidents (best achieved zero LTA), namely 26 days. The certification unit has made periodic records for every work accident that occurs and is reported in the P2K3 routine report. For example, during the third quarter of 2022. In the document shows that the number of work accidents in August is in line with the Plantation Land Development Progress Report, where there were 4 work accidents at PT Nabire Baru and no work accidents at PT Sariwana Adi Perkasa.

Based on interviews with EHS team and management representative, it is known that cut off period in the company for one year, namely every March, so that in April is a new period counted. Then, from the table above it is also known that the company has recapitulated the number of work accidents that occurred at PT Nabire Baru and PT Sariwana Adi Perkasa for the period April – September 2022 (Year to Date column, according to the company's cut off). Based on the data above, it is known that the total work accidents at PT Nabire Baru were 23 minor accidents with a lost time of 8 days, a safety index of 4.21 and the days without work accidents (best achieved zero LTA) was 73 days. Meanwhile for PT Sariwana Adi Perkasa, there was 1 minor work accident with 2 days lost time, a safety index of 3.50 and the days without work accidents (best achieved zero LTA) was 118 days.

Based on the results of field visits and interviews with all workers in the plantation unit, it was stated that the most frequent work accident was being bitten by a snake. Then, according to a statement from a spray worker in Block K13 Division 2 SWE, information was obtained that the worker had been bitten by a snake while at work which occurred in June 2022. The unit of certification shows the following documents for recording work accidents:

- Certificate of chronology of accidents number 01/JKK-PT.NB.HR/VI/2022. A worker with the initials P on June 24th, 2022 at 09.24 WIT located in SWE Division 2, had an accident at work while collecting fruit. The victim's index finger was bitten by a snake, then the victim was taken to the clinic for first aid and then referred to Nabire Hospital.
- The case has been reported to BPJS *Ketenagakerjaan* which is listed in the Phase 1 Work Accident Case Report which was reported on June 25th, 2022 by attaching a chronology of events and a certificate of work accident examination by a doctor.

Status: Comply

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

7.1

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

7.1.1

The certification unit has procedures for controlling plant pests and diseases listed in the SOP document for Pest & Diseases Management in Mature Oil Palm with the number OP/C21/03/19/04 revised in March 2019. The procedure explains that the process of controlling plant pests and diseases is to apply good agricultural practices and active in monitoring the emergence of pests and

diseases (Early Warning System), technical control and utilization of host plants and natural enemies. The procedure also explains the types of pests and diseases that often attack plants in the mature phase, such as bagworms and nettle caterpillars, rhinoceros beetles, rats, termites, grasshoppers, *ganoderma* and other diseases.

The document also regulates the stages of identification, monitoring and control of pests and diseases. In principle, the pest and disease census is an early warning measure against diseases and pests. If the census results show that the attack exceeds the threshold, then control is carried out, for example:

- Attack of leaf-eating caterpillars: The frequency of observations is carried out regularly every 3 months and the control threshold is 5-10 larvae per midrib.
- Grasshopper attack: The frequency of observations is carried out regularly every 1 month and the control threshold is 10 individuals per oil palm tree or >20% of leaf midrib are attacked.
- Ganoderma disease attack: The frequency of observations is carried out periodically every 3 – 6 months and the control threshold is adjusted to the age of the plant (immature and mature).

The unit of certification shows records of the implementation of pest monitoring and control, for example:

- The results of the grasshopper's census per September 2022, it was found that there were grasshoppers attacks in the SSE and KBE units with a high attack rate or already exceeding the control threshold.
- The results of the census of owl cages per May 2022, 10 units of owl cages have been installed in all areas of unit estate.
- The results of the plant census are useful, it is known that several plant species such as *Turnera subulata* and *Cassia cobanensis* have been planted around oil palm plantations such as field boundaries, roadsides, empty spots and under power lines.

Based on the results of field visits to the SSE unit, it was found that there were locust attacks which were categorized as high-level attacks (already exceeding the control threshold). The unit of certification has carried out control of the attack of grasshoppers (*Sexava nubila*) in accordance with applicable procedures. Control is done chemically by means of trunk injection using the active ingredient insecticide acephate. The certification unit estimates that the control of locust attacks in the SSE and KBE units will be completed by the end of October 2022, while the BNE unit is in recovery after the application of trunk injection.

In addition, based on the results of the field visit at Block J29 Division 1 of SWE, it is known that the unit of certification has also used host plants such as *Turnera subulata* and *Cassia cobanensis* to encourage the population of natural enemies of oil palm leaf-eating caterpillars.

7.1.2

Based on the results of interviews with management representatives and field visits, it is known that the unit of certification does not use invasive species imported from outside the region/overseas. However, there are 2 invasive species originating from their own estate, namely *Merremia* and *Asystasia* species.

The certification unit has a program to monitor and prevent its spread which is stated in the *Merremia* Spray and Selective Weeding Chemical *Asystasia* Program documents for the period 2022 – 2023. The document also describes the control of invasive species plants by spraying using the active ingredient 2,4-D Dimethyl amine 865. g/l.

7.1.3

Based on the results of field visits to each estate and interviews with unit of certification management representative, it is known that there is no pest and disease control using fire or the former use of fire to control pests and diseases.

Status: Comply

7.2

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

7.2.1

The unit of certification has a procedure for mitigating the use of pesticides for pest/disease/weed spraying activities listed in the SOP document Occupational Environment, Health and Safety in Spraying Activity number SOP.EHS.SPR-01 which is approved by the Director of Sustainability. The document describes the procedure that stipulates that every spraying worker must comply with and follow the following provisions:

- General terms and conditions of spray work
- Preparation of work tools and mixing of chemicals

- Personal Protective Equipment (PPE) used
- Emergency state
- Etc.

Based on the results of interviews with management representatives, it is known that the use of pesticides for pest and disease control as well as for weed control must be based on census results and field conditions.

In an effort to minimize the use of pesticides, the unit of certification uses pesticides that are selective in accordance with the target pests/diseases/weeds being controlled. Pesticides used by companies for example in 2021/2022 include:

Merk	Active Ingredient s	WHO 2009		Remark	ID	Target
		LD50	Class			
Metaprima 20WG	Metil Metsulfuron 20%	>5000	3	Light danger	RI.01030120031897	Broadleaf weed
Prima Guard 480 EC	Triclopyr 480 g/l	710	2	Moderate danger	RI.01030120155320	Broadleaf weed
Centalon		710	2	Moderate danger	RI.01030120103716	Broadleaf weed
Prima Up 480 SL	Isopropyl amine glyphosate 480 g/l	4230	3	Light danger	RI.01030120031779	Broad leaf weeds and narrow leaf weeds
Prima Jos 865 SL	2,4-D dimetil amine	700	2	Moderate danger	RI.01030120083070	Broadleaf weed
Prima Ace 75 WG	Acephate 75%	945	2	Moderate danger	RI.01010120206965	Palm Leaf Eater Caterpillar and Grasshopper

7.2.2 and 7.2.3

The unit of certification shows records of pesticide use, for example in 2021/2022 – 2022/2023, as follows:

No	Active Ingredients	Total usage (Kg/Liter)			
		2019/2020	2020/2021	2021/2022	2022/2023
1	Isopropyl amine glyphosate 480 g/l	14,157	13,769	16,532	12,391
2	Metsulfuron methyl 20 WG	1,091	606	281	182
3	Triclopyr 480 g/l	2,255	4,588	1,817	985
4	2,4-D Dimetil amine 865 g/l	311	161	685	238
5	Cypermethrine 100 g/l	0	0	56	0
6	Acephate	123	854	1,427	887
7	SIME EBOR BAITS	0	0	0	0
8	Paraquat	0	0	0	0

Based on the results of the study of the Herbicide/Pesticide Use document, it is known that the unit of certification has recorded the use of each registered pesticide every month including the active ingredients, treatment area and number of applications. For example, the use of pesticides with the active ingredient Isopropyl amine glyphosate 480 g/l (LD 50: 4,230) for the period January – September 2022 was 12,391 liters with an area of 5,551.9 Ha used was 0.092 a.i/l/ha.

Then, based on the results of the document review, it is known that the unit of certification has minimized the use of pesticides. Then, based on the results of field observations, it is known that the certification unit has used beneficial plants such as *Turnera subulata* and *Casia cobanensis* as well as natural enemies of pests, namely *Tyto alba* to maximize biological pest control. The use of pesticides for weed control is carried out based on weed conditions in the field.

7.2.4

The unit of certification already has the SOP for Management of Pests and Diseases of Mature Plants with the number OP/C21/03/19/04 March 2019 revision. The procedure explains that the process of controlling pests and plant diseases is by implementing good agricultural practices and being active in monitoring the emergence of pests and diseases (Early Warning System), technical control and utilization of host plants and natural enemies.

Based on the results of the study of census documents and pest and disease control, as well as interviews with unit of certification management representative, it is known that there is no use of pesticides for preventive purposes. Pest and disease control must be based on census result and the use of pesticides is only carried out if the level of pest attack exceeds the economic threshold.

7.2.5

Based on the results of document review, records of pesticide use and field visits at the pesticide warehouse, it is known that there is no use of pesticides that are included in the World Health Organization (WHO) Class 1A or 1B list or included in the Stockholm or Rotterdam Conventions, as well as paraquat.

7.2.6

The unit of certification shows the procedure for mitigating the use of pesticides for pest/disease/weed spraying activities with the number SOP.EHS.SPR-01 Revision 1 dated May 8th, 2018, which has been approved by the Director of Sustainability. In Chapter 4.0 the procedure is explained regarding the terms and conditions of workers who are allowed to carry out spraying activities, for example, workers must have competence in the use and handling of chemicals (pesticides).

Based on the results of the document review, it is known that the certification unit has carried out training on the use of pesticides to spray workers. For example:

- Trunk injection training at Block J20 of the SSE Division on August 30th, 2022 which was attended by 5 people.
- Weed control training on September 6th, 2022 attended by 13 people.

In addition, based on the results of interviews with spray workers who revealed that routine spraying activity training is carried out by the certification unit as a form of updating workers knowledge. Workers can explain that the use of pesticides must be on time, the right method of use, the right type of pesticide, the right target and the right dose/concentration. Workers are also required to use PPE in carrying out work related to chemicals.

7.2.7

Based on the results of the field visit to the pesticide warehouse, it is known that the pesticide storage is arranged by type of pesticide. The storage area has good ventilation, there are danger symbols, MSDS for each pesticide. In addition, there is a trap available in case of pesticide spills.

7.2.8

Unit of certification can show documents for recording and monitoring used pesticide containers by using a logbook of incoming and outgoing goods at the Agrochemical warehouse. In addition, the company also has a pesticide storage procedure contained in procedure below:

- SOP for hazardous material Management (SOP.EHS.BBB-01) dated 16-07-2018 which explains procedures for hazardous material management to avoid the risk of work accidents and environmental pollution.
- SOP for Waste Management No. SOP.EHS.LIM-01 revision 02 dated 12 May 2018. B3 waste is stored in a hazardous waste storage licensed and handling is carried out according to its type and characteristics hazardous waste is handed over to a licensed third party (collector).

Based on field observations at the agrochemical warehouse and hazardous waste storage area at PT Nabire Baru and PT Sariwana Adi Perkasa, it is known that the pesticide storage area is specially provided with adequate ventilation and an isolated location. Used

pesticide packages classified as Hazardous Waste were also found stored in a well-monitored Hazardous Waste storage warehouse which was then handed over to licensed collectors. Unit of certification shows last hazardous waste was transported on 10 October 2022, which PT Larashatiku Environmental did as a licensed hazardous waste transporter.

Based on interviews with pesticide application officers at BHE, SWE, KBE, and SSE, it was found that all containers used for pesticide packaging were returned and sent to the Hazardous Waste Warehouse and were not used for purposes other than pesticide application activities. All used packaging containers, work tools and work clothes are stored in a special storage area, so that no contaminated items are taken home. The results of observations in the employee housing area showed that there was no reused pesticide packaging.

7.2.9

Based on the results of interviews with unit of certification management representative, it is known that the unit of certification does not spray pesticides through the air.

7.2.10

The unit of certification has procedures that regulate EHS spraying activities which are listed in the SOP.EHS.SPR-01 Revision 1 document dated May 8th, 2018. The procedure explains the terms and conditions for spray workers to carry out medical tests at the beginning of recruitment, annual MCU and high risk MCU.

Based on the results of document review, it is known that the unit of certification has conducted periodic checks on spray workers twice a year by doctors at the unit of certification clinic who already have a *Hyperkes* certificate. The last high risk MCU (cholinesterase) was conducted in September 2022 with the following details:

- There were 251 spray and fertilizer workers at PT Nabire Baru who were examined and from the results of the inspection it was found that all workers were declared not exposed to chemical toxins due to work.
- There were 18 spray and fertilizer workers at PT Sariwana Adi Perkasa who were examined and from the results of the inspection it was found that all workers were declared not exposed to chemical toxins due to work.

From the description above, it can be concluded that the unit of certification has a record of the results of the high risk MCU for pesticide operators.

7.2.11

The unit of certification has procedures that regulate EHS spraying activities which are listed in the SOP.EHS.SPR-01 Revision 1 document dated May 8th, 2018. The procedure explains the general terms and conditions of spray workers, namely pregnant and lactating women, children under 18 years of age and workers those with medical limitations are prohibited from spraying.

Based on the results of interviews with representatives of the Gender Committee and women workers in the Estate, it is known that female workers related to chemicals will be transferred to other jobs if they are pregnant or still breastfeeding.

Status: Comply

7.3

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

7.3.1

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

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

In the realization of waste management, it is divided into several types based on the characteristics of the waste it produces, including:

Hazardous and Toxic Waste

In the management of hazardous and toxic waste, the company does not reuse it, but only temporarily stores it located in PT Nabire Baru and PT Sariwana Adi Perkasa. The company also has a licensed hazardous waste storage area, including:

- Permit for Hazardous and Toxic Waste Management for PT Nabire Baru unit based on *DPMPTSP* Decree of Nabire Regency Number 503/05/DPMP-IL/V/2019 dated 20 May 2019 and is valid for 5 years.
- Permit for Hazardous and Toxic Waste Management for PT Sariwana Adi Perkasa unit based on *DPMPTSP* Decree of Nabire Regency Number 503/09/DPMP-IL/XI/2019 dated 28 November 2019 and is valid for 5 years.

The waste stored in the temporary storage warehouse will then be transported by a licensed party twice a year. The latest transportation is proven through the Electronic Manifest document and the official report of the transportation carried out on 10 October 2022 by PT Larashatiku Environmental which is a licensed party. Unit of certification can show a cooperation agreement with the carrier (PT Larashatiku Environmental), which is based on the document Agreement number PTSAP/C/211.1.1 (PT Nabire Baru) and number PTNB/C/234.1.1 (PT Sariwana Adi Perkasa) on 18 February 2022 and valid for 1 year. Unit of certification can also show the document the legality of the carrier, such as a valid transportation permit from the Ministry of Environment and Forestry, a valid permit for special goods transportation from the Ministry of Transportation, a valid Business Identification Number and a Cooperation Agreement between the carrier and a licensed processor and/or user.

Unit of certification can also show documents for storing and handling Hazardous Waste in accordance with their SOPs and Government Regulation Number 22 of 2021. These documents include Manifest, balance sheet, and logbook. Based on the results of the document review by comparing the manifest, the balance sheet, and the logbook, the data on waste transported on 10 October 2022 was in accordance with the data recorded in the balance sheet and logbook for the period before the transportation was carried out. Similarly, the comparison between the date after the transportation was carried out (10 October 2022) starting from empty. The company records all waste that enters and leaves the storage warehouse properly so that waste management data can be tracked easily and there are no recording differences.

The results of field visits to hazardous waste storage warehouses at PT Nabire Baru and PT Sariwana Adi Perkasa also show that unit of certification has carried out hazardous waste management quite well. All obligations listed in the waste storage permit have been fulfilled, such as the availability of fire extinguishers, showers, eyewash, coordinates, alarms, first aid kits, oil traps and appropriate labelling. In addition to good lighting and air ventilation, unit of certification also has drainage channels on the outside of the warehouse to anticipate pollution to the surrounding environment. The results of interviews with storage managers also show that managers fully understand the SOP for hazardous waste management and mitigation actions in the event of potential pollution. Unit of certification has also reported the results of hazardous waste management which is carried out every quarter with evidence of Report of Hazardous Waste Management from PT Nabire Baru and PT Sariwana Adi Perkasa of third quarter of 2022 which were reported to the Environmental Agency of Nabire Regency on 11 October 2022 and to Ministry of Environment and Forestry on 17 October 2022 with proof of electronic receipts number 1666016387-9837 (PT Nabire Baru) and 1666016864-9838 (PT Sariwana Adi Perkasa).

Non-hazardous and toxic waste

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

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

Liquid, Solid and Air Waste

Solid waste from the FFB processing process in the form of shells and fiber is reused by the company as a substitute for fossil fuels (diesel) for power generation in boilers. Meanwhile, the empty fruit bunches are used as fertilizer. Data on solid waste utilization is explained in more detail in indicator 7.9.1.

Unit of certification does not use POME by applying it to the Land Application, but instead dumping it into water bodies. The regulation and management of POME are explained in more detail in indicator 7.8.3. As for air waste, the company has not made a common use for air waste, namely the Biogas Plan, so far, the management related to air waste has only been limited to measuring air quality from waste-producing sources such as WWTP, Boilers and Gensets.

7.3.2

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

The results of interviews with workers who live in the emplacement area also stated that the waste management carried out by the company was very good and regular. Trash cans are provided properly, all waste disposal facilities have also been provided by the company such as organic and non-organic waste bins that will be replaced if damaged, hazardous waste warehouses and landfills. The resource persons also understand very well how to separate the types of waste they produce and what types of waste should not be reused.

7.3.3

Unit of certification does not carry out open burning to destroy waste, this can be proven from field observations in residential area and its landfill in each estate, which did not find any traces of burnt waste. The results of interviews with employees also stated that they had never burned waste, because they were aware of the prohibition on burning activities. Garbage from housing is disposed of in the bins that have been provided, then transported every 2 times a week and disposed of in landfills and then buried when it is full. The results of field observations in employee housing areas also show many warnings to prohibit waste burning activities as well as the dangers that can arise from burning activities. Interviews with management also explained that the regulations regarding the prohibition of burning have been understood by all workers and strict action would be taken if they violated them.

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 demonstrates procedures related to soil fertility management to optimize crop yields and have minimal impact on the environment, which are as follows:

- SOP Legume Cover Crops number Ref. Code: OP/C7/03/19/03 revision March 2019.
- SOP Immature Maintenance number Ref. Code: OP/C09/03/19/03 revision March 2019.
- SOP Manuring Mature number Ref. Code: OP/C14/03/19/03 revision March 2019.
- SOP Fertilizer Sampling for Quality Control Analysis number Ref. Code: OP/C15/03/19/02 revision March 2019.
- SOP Foliar Sampling for Nutrient Analysis and Growth Determination number Ref. Code: OP/C16/03/19/02 revision March 2019.

The procedure describes the maintenance of soil fertility including the use of cover crops, application of empty bunches as mulching, fertilization techniques, application of fertilization to immature and mature plants, application of fertilization to marginal soils, sampling of fertilizers to analyze quality control and leaf sampling to analyze nutrients during plant growth. Implementation of SOPs is monitored regularly by operational audits or Plantation Advisory. In addition, the implementation of fertilization is supervised by the foreman, assistant and re-evaluation by the manager.

7.4.2

The unit of certification has shown Certificate of Analysis Number 099/LAB.01/EKS/VIII/2022. The analysis carried out was the

analysis of 279 leaf samples for PT Nabire Baru and PT Sariwana Adi Perkasa which were tested on August 1st, 2022. The parameters measured were N, P, K, Mg, Ca and B. The results of the analysis were used as fertilizer recommendations.

The unit of certification has also shown the Certificate of Analysis No. 009/LAB.03/EKS/VII/2022 for the analysis of 36 soil samples tested on May 6th, 2022. The parameters tested were the content of pH H₂O, C-Organic, N-Total, P-Total, P-Bray II, Cation Exchange Capacity (*KTK*), Cu, Zn and Base Exchange Capacity (K, Ca, Mg and Na).

7.4.3

The unit of certification has also implemented empty bunches as a nutrient recycling strategy. The total use of empty fruit bunches as organic fertilizer from April – September 2022 is 5,067.55 tons at PT Nabire Baru and PT Sariwana Adi Perkasa. In addition, the unit of certification also uses POME as a nutrient recycling strategy. The POME streamed in January – September 2022 is 64,547.00 M³.

Based on the results of the field visit, it is known that the unit of certification also uses the trimmed midrib as an alternative source of nutrition.

7.4.4

The unit of certification shows the planning documents for the use of fertilizers for nucleus and plasma plantations at PT Nabire Baru and PT Sariwana Adi Perkasa. The document explains that the budget for fertilizer use for the period April 2022 – March 2023 is 7,056 tons. Then, the unit of certification showed the application of fertilizer use for the April - September 2022 period of 3,085.74 tons where the types of fertilizers used were urea, ERP, MOP, dolomite, borate and Hi-Kay Plus. In addition, the unit of certification also shows data on the use of fertilizers per ton for each type of fertilizer used, for example the use of fertilizers in July 2022 as follows:

- Urea = 91.72 ton
- ERP = 47.45 ton
- MOP = 41.14 ton
- Dolomite = 118.55 ton
- Borate = 0.75 ton
- Hi-Kay Plus = 9.00 ton

	Status: Comply	
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7.5

Practices minimize and control erosion and degradation of soils.

7.5.1

The unit of certification has procedures that explain the conservation of areas with high erosion potential, including:

- SOP Soil and Water Conservation Ref. Code: OP/C6/03/19/04 revised March 2019 which regulates soil conservation to minimize soil erosion and loss of nutrients by reducing the amount and speed of runoff, improving soil characteristics for example increasing water infiltration that resists erosion forces, preventing soil movement massive topsoil and soil moisture retention.
- SOP for Setting Conservation Boundaries No. SOP.EHS.DCB-01 dated May 4th, 2015 which explains the technical guidelines for implementing delineation of conservation area boundaries (HCV) including delimitation of rivers, springs, forests or other HCV areas determined by the unit of certification.

The certification unit has a topographic map of the plantation area of PT Nabire Baru with a scale of 1:75,000 and PT SAP with a scale of 1:60,000 made by the Department of GIS & GPS. The map depicts the contours and shape of the earth with a slope class distribution between 0 – 2 degrees / 0 – 4% (flat), 2 – 6 degrees / 4 – 12% (undulating) and 6 – 12 degrees / 12 – 24% (rolling). Then, based on the map of the peat area of PT Nabire Baru and PT SAP with a scale of 1:100,000, it is known that there are types of peat soil covering an area of 1,183.1 Ha. In addition, the certification unit also has a map of the location of areas with high erosion potential as contained in the water source identification map contained in HCV maps include river boundaries and spring areas (hill areas).

Thus, it can be concluded that the unit of certification already has a map that identifies marginal soils with high slopes including peat soil types.

7.5.2

Based on the results of the study of area statement documents and explanations from management representatives, it is known that the unit of certification does not carry out oil palm replanting activities, the oldest planting year is 2012. The certification unit also does

not carry out new oil palm planting activities in new or existing areas.

7.5.3

Based on the results of the study of the area statement documents and field visits, it was found that the unit of certification did not carry out any new plantation development activities.

Status: Comply

7.6

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

7.6.1

The unit of certification shows a land suitability assessment report conducted by Carmiel Agrotech SDN BHD and Param Agricultural Soil Survey (M) SDN BHD for PT Nabire Baru and PT Sariwana Adi Perkasa Estate in Nabire Regency, Central Papua Province in March 2017. In the report explained about topography, drainage, geology, climate, soil type, evaluation of soil suitability and soil management groups for oil palm cultivation.

Then, the unit of certification shows a map of soil types in the unit of certification area. Based on the map, it is known that the types of soil found in the PT Nabire Baru and PT Sariwana Adi Perkasa areas are: Entisols, Histosols (peat), Inceptisols and Ultisols. In addition, the unit of certification has also shown a topographic map of the plantation area with a scale of 1:75,000 which depicts the contours and shape of the earth. Based on the map, it is known that the unit of certification does not plant in areas with steep sulfur.

7.6.2 and 7.6.3

Based on the results of a land suitability assessment report and operational maps, it is known that oil palm has been planted on marginal soils, namely peat soils at PT Nabire Baru. The company has implemented best practice soil management and drainage management for peat soil maintenance for example through monitoring of subsidence of peat soil layer, groundwater level, etc., which are explained in more detail in indicators 7.7.3 and 7.7.4.

And based on explanations from management representatives, it was found that the unit of certification did not carry out any new oil palm plantation development activities in new or existing areas.

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 a study of the area statement documents of PT Nabire Baru and PT Sariwana Adi Perkasa, it was found that there were no new plantings after November 15th, 2018 in peat areas.

7.7.2

The unit of certification has presented Goodhope Asia Holdings, Ltd. peat inventory documents. Based on the peat inventory report, it is known that there are 615.3 ha of peat planting in PT Nabire Baru. In addition, it is known that there is a peat conservation area of 488.7 ha in PT Nabire Baru and 31.5 ha in PT Sariwana Adi Perkasa. Unit of certification has reported peat inventory to RSPO secretariat in 2020.

7.7.3

The unit of certification has a procedure for regulating the settlement of high-layered peat soils as stated in the SOP Best Management Practices in Existing Organic Soil Planting Ref. Code: OP/C24/03/19/02 March 2019 revision. In item 2.3.4 the SOP regulates the procedure for installing subsidence pole, which is 1 unit per 1000 ha and measurements must be made every year. Based on a study of the peat distribution map document, it is known that the area of peat land used for planting oil palm at PT Nabire Baru is 615.3 Ha and the peat soil is spread over several estate locations such as BNE, SWE and KBE. The peat land in the company is not in one large expanse in one of the estates. Based on the results of interviews with management representatives, information was obtained that the placement of 1 subsidence pole in Block K19 SWE unit had been adjusted to the results of the land suitability assessment where if a straight line was drawn vertically and horizontally, the middle position of peatland was in that block.

Then, based on the results of a field visit to Block K19 of the SWE unit, it was found that there was 1 well-functioning subsidence pole. Management representatives stated that the installation of subsidence pole will be planned to be added in 2023 in accordance

with the RSPO Manual on BMP for Existing Oil Palm Cultivation on Peat, Version 2 (2018), namely a minimum of 1 subsidence pole in every 240 Ha of estate.

The unit of certification already has a peat subsidence monitoring benchmark of 1 unit at Block K19 of SWE estate. In addition, the unit of certification also has supporting facilities and infrastructure for planting in peat areas, namely, waterway maps, main ditches, collection ditches, as well as subsidiary ditches, piezometers and sluice gates to regulate the water level in the peat area.

The unit of certification has also monitored peat subsidence reduction and water level monitoring. For example, the peat subsidence in Block K19 SWE estate in the monitoring period from February 2022 to September 2022 was 1.5 cm with a total peat subsidence from July 2018 to September 2022 of 17.2 cm.

7.7.4

The unit of certification has carried out monitoring of water levels in the planting area which is carried out every month. The groundwater level is maintained to prevent the rate of subsidence of the peat soil. The monitoring results are recorded in the water level measurement monitoring document, for example, the results of monitoring the water level in Block M14 of the BNE unit in March 2022, which is 66 cm below the average ground level. Based on the results of field visits at Block F17 KBE, it is known that the water level is 26 cm below ground level.

Based on the results of field visits, it is known that the unit of certification maintains the humidity of the peat area by maintaining the existing types of vegetation. Spraying is done selectively so that there is no baldness in the peat area.

7.7.5

Based on review of the area statement document and the unit certification's long-term plan, it is known that the unit of certification does not have a replanting plan within the next 5 years. The oldest planting year managed by the unit certification was 2012.

7.7.6

The unit of certification has managed all existing plantings on peatlands in accordance with existing regulations. The unit of certification already has a water management system in peatlands. The management carried out by the company is by monitoring the groundwater level on peatlands. Monitoring is carried out using a piezometer, apart from that the company also monitors peat subsidence by installing peat subsidence stakes. The unit of certification has also managed water by building several supporting facilities and infrastructure to maintain water conditions on peatlands. Facilities and infrastructure for the management of peat areas at PT Nabire Baru are as follows:

Description	Actual (Unit)
Concrete wall stop-off	41
Permanent stop-off	1
Piezometer	13
Peat Subsidence	1
Water level in drain	8
Ombrometer	4

Based on the results of the soil survey analysis, it is known that there is peat soil in the certification unit with various depths. Certain areas are also prone to flooding and have poor drainage properties. To overcome this, several strategies that have been carried out by plantation managers are to implement good peat management as follows:

- Water management through maintaining water levels at 40 – 50 cm and monitoring the rate of peat subsidence as an indicator of water management quality.
- Maintain ground cover crops aimed at maintaining soil moisture in the field.
- Fertilizer application according to agronomist recommendations.

In addition to water management on peatlands, the company also conducts regular monitoring to prevent land fires on peatlands. Based on the results of the field visit, it is known that there is an appeal board for the prohibition of burning. In addition, the company also has facilities and infrastructure for fighting land fires.

In implementing best management practices for oil palm cultivation on peatlands, the company has officially communicated with the Ministry of Environment and Forestry (*KLHK*) regarding the situation where PT Nabire Baru's TMAT compliance point was wrong. Then, based on the results of interviews with management, it was found that the Ministry of Environment and Forestry had not been able to conduct a ground check to ensure compliance points. In addition, as a form of progress, *KLHK* assigns the certification unit to carry out documented reporting through the Simatag-0.4 website (gambutindonesia.menlhk.go.id/simatag-04m-v2) regarding TMAT and rainfall monitoring which is carried out 2 times in 1 month until *KLHK* representatives can visit the site.

7.7.7

Based on the results of the study of the peat inventory documents of PT Nabire Baru and PT Sariwana Adi Perkasa, it is known that there are 488.7 ha of peat conservation areas in PT Nabire Baru and 31.5 ha in PT Sariwana Adi Perkasa. Based on the results of interviews with management representatives, it is known that the unit of certification will not clear land for non-corporate purposes or other interests related to unit of certification activities. Management carried out in the form of installation of sign boards for HCV areas, prohibition of burning and monitoring of fires.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

Unit of certification has identification on water course within its operational area in HCV document and there is also water management plan covered in HCV management plan, environmental management plan document (RKL/RPL document) SOP for riparian area management (SOP.EHS.RAC-01) 10-12-2020 dated 12 October 2021, Water management plan No. SOP EHS.WMP-01 dated 17 July 2018, Monitoring of surface water quality No. SOP EHS.MWQ-02 June 1, 2019 and the results of monitoring the surface water quality, POME testing, monitoring well water.

Unit of certification also conducted regularly water quality testing every semester for Ubay River upstream; Wanggar River downstream; Wami River downstream; Woumi River downstream; Ubay River downstream, Wami River upstream, Bambu River upstream, Sima River downstream refers to the Threshold government regulation No. 22 of 2021 (Class II). Last water quality testing was conducted on 4 April 2022 by accredited laboratory No. LP-195-IDN. There are several parameters that pass the quality standard, namely BOD and COD. For the parameters that pass the quality standard, the management unit has evaluated, the BOD and COD parameters are outside the quality standard this is due to the quality of the water upstream of the river which from the beginning was outside the quality standard so that operational activities did not increase the pollution burden on the river.

Unit of certification also conducts groundwater quality testing. Results of groundwater quality analysis of PT Nabire Baru and PT Sariwana Adi Perkasa on 4 April 2022. Based on the results of the test, no parameter exceeds the threshold value determined in accordance with the Minister of Health Regulation No. 32 of 2017 appendix I.

7.8.2

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

- SOP for riparian area conservation No SOP.EHS.RAC-01 dated October 12, 2021 at point 4.2.6 explains not to carry out chemical activities on riparian conservation areas (for planted areas). In section 4.2.5 the marking of riparian areas is done by painting palm trees 50 m or 100 meters away with a standard 1-meter-high painting from the ground with orange paint so that they are easy to see and monitor.

Unit of certification continues to make efforts to manage water sources such as periodically testing surface water quality standards to ensure water quality is still within normal limits every semester, as well as marking the boundaries of the chemical application area in color. In addition, unit of certification also conducts socialization to employees and the surrounding community in conservation efforts which can be proven based on the minutes of socialization to workers on 8 August 2022 and to the community on 21 April 2022. Interviews with spraying and fertilizing workers in BHE, SWE, KBE, and SSE also stated that they were aware of the rules regarding chemical application limits, prohibition of washing chemically contaminated goods in water bodies and other activities that have a negative impact on the environment water sources.

7.8.3

All palm oil mill effluent produced by Nabire Matoa Mill is processed at the wastewater treatment plant before being distributed to

plantations as land applications. Monitoring is carried out every month regularly and reported to the Environmental Agency every semester. Unit of certification can show evidence regarding results of POME quality measurement in a document of the effects of tests carried out by accredited laboratory (LP-195-IDN). The analysis of the test results for the period January-September 2022 shows that all parameters are by the applicable quality standards. This indicates that the liquid waste generated from FFB management activities can be applied to land applications. Unit of certification already has a Land Application Permit based on Decree of DPMPTSP of Nabire Regency No 503/10/DPMPTSP-IL/XI/2019 regarding permit for use of palm oil industrial wastewater on the oil palm plantation land of PT Nabire Baru. The application area of 500.4 ha is in blocks J10-J27, J30-J32, K33, K34, L33, and L34, issued on 28 November 2019, valid for five years.

7.8.4

Unit of certification already has a Surface Water Utilization Permit for PT Nabire Baru unit based on Decree of One-Stop Integrated Service and Investment Service of Nabire Regency Number 27/SIPA/DPMPTSP/II/2020 on 14 February 2020 and is valid for 3 years. In the document there is a provision for a quota of surface water intake of 16.760,45 m³/month. Unit of certification can also show documents for recording daily water use, as well as the results of the recapitulation of water use for palm oil processing units every month.

For example, unit of certification can show recapitulation of water use for April-September 2022 period. Based on those data, it can be obtained that average water use for FFB processing is 17,819.58 m³/month while the total water use is 106,917.50 m³/month. Based on result of interview with management, the water use permit above uses mill capacity of 15 tons FFB/hour. Unit of certification has increased mill capacity from a capacity of 15 tons of FFB/hour to 45 tons of FFB/hour in 2020. This capacity has resulted in increase of the use of water for palm oil processing. The increase in water use due to this capacity increase has been verified by relevant agency based on Minutes of Environmental Monitoring conducted by Environmental Agency of Nabire Regency and Environmental Agency of Papua Province on 19 February 2022. Based on that document, palm oil mill with production capacity of 45 tons of FFB/hour requires water as much as 1,080 m³/day or 27,000 m³/month. Based on these data, the use of water is in accordance with actual conditions.

Unit of certification can also show proof of payment of water levy to Regional Revenue Management Agency of Papua Province for period June-August 2022 with payment period being made every month. Unit of certification shows an example of proof of payment of the last water levy made for the period of water use in August 2022' based on Receipt No. 10170/4.1.01.04.01.001/22-09-2022/1000 to be paid on 22 September 2022. Payment of water levy covers use of water for process, boiler, and domestic activities. The results of the document review show that the payment has been in accordance with the use of water used every month.

Result of field observation in Water Treatment Plan (WTP) and water intake also show that the flowmeter used is still functioning properly. Result of interview with officers responsible for WTPs also show that operators are very understanding about how WTPs work and recording flowmeter data. Officers can also show data in and out of water which is recorded every day.

Status: Comply

7.9

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

7.9.1

The company has consistently implemented efficiency of fossil fuel efforts through renewable energy usage by using shell and fiber. Its efforts have documented and monitored well. For example, in monitored renewable energy usage and efficiency analysis document recorded as follows:

- Daily monitoring of the use of solid waste for boiler fuel.
- Daily monitoring on fossil fuels uses in each unit.

The company has a record of the use of renewable energy or fossil energy are explained on recapitulation GHG source POM on 2021. Directly, the company already maximizing the use of renewable energy (fiber & shell) as boiler fuel. For example, use of shells and fiber period October 2021 until September 2022 has produces 3.795.942 kWh of electricity from turbine. Renewable energy use per ton of palm product in the mill is 27.25 kwh/ton FFB. Result Direct fossil fuel used is 5.04 kWh/ ton FFB.

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

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

Fossil fuel reducing on Nabire Matoa POM have been implemented by fiber/shell usage for boiler. POME has been monitored every month and monitoring periods November 2021 until September 2022 shown that all of waste water testing parameters is compliant to the standards quality.

Based on document review for examples: pesticides usages monitoring, diesel fuel monitoring, HCV identification etc. found that accurate data has been put into the RSPO palm GHG Calculator. The calculation of GHG and its monitoring has conducted by EHS department. GHG emission calculated using RSPO palm GHG calculator 4.0 Summary of GHG emission for Nabire Matoa POM and its supply base for period of January-December 2021 are listed as follows:

Summary Emission

Emission per product	tCO ₂ e/tProduct
CPO	2.00
PK	2.00

Production	t/yr
FFB processed	138,035.34
CPO produced	30845.58
PK produced	3671.29

Extraction	%
OER	22.35
KER	2.66

Land use	Ha
Planted area	7553.90
Planted on peat	615.42
Conservation Area Forested	9099.33
Conservation Area Non Forested	0

Summary of field emission and Sinks

Description	Own crop			Group			Total
	tCO2e	tCO2e/ha	tCO2e/tFFB	tCO2e	tCO2e/ha	tCO2e/tFFB	
Emissions Sources							
Land conversion	152197.04	20.15	1.10	0.00	0.00	0.00	152197.04
CO2 emissions from fertilizer	1341.84	0.18	0.01	0.00	0.00	0.00	1341.84

N2O emissions from Peat	4606.89	0.61	0.03	0.00	0.00	0.00	4606.89
N2O emissions from Fertilizer	1566.52	0.21	0.01	0.00	0.00	0.00	1566.52
Fuel consumption	2648.92	0.35	0.02	0.00	0.00	0.00	2648.92
Peat oxidation	33601.88	4.45	0.24	0.00	0.00	0.00	33601.88
Sinks							
Crop sequestration	-70717.59	-9.36	-0.51	0.00	0.00	0.00	-70717.59
Sequestration in Conservation area	-83440.86	-11.05	-0.60	0.00	0.00	0.00	-83440.86
Total	41804.64	5.53	0.30	0.00	0.00	0.00	41804.64

Summary Oil Mill Emissions and Credits

Remarks	tCO ₂ e	tCO ₂ e/t FFB
Emissions sources		
POME	27057.26	0.20
Fuel consumption	47.11	0.00
Grid electricity	0.00	0.00
Credits		
Export of grid electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	27104.37	0.20

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

From the GHG Calculator data, it can be seen that the value of CPO and PK has decreased slightly from initial certification where currently (in 2022) the value is 2.00 tCO₂e/tProduct, while for 2021 the value is 3.59 tCO₂e/tProduct. This is due to addition of HCV area in accordance with addition of extension scope. This makes the crop sequestration generated from the HCV area is quite large.

7.10.2

Unit of certification has Summary Report submitted for HCS Approach Peer Review Process on April 2018. In March 2017 Goodhope engaged PT Ata Marie (Ata Marie) to conduct HCS Assessment on PT Nabire Baru (NB) and PT Sariwana Adi Perkasa (SAP), subsidiary plantation companies located in Nabire Regency, Papua Province. The combined NB/SAP site covers 21,056 ha (HGU area).

In 2016 Goodhope temporarily stopped expansion operations due to external stakeholder pressure regarding environmental and social practices. Goodhope has been requested by stakeholders to redo its High Carbon Stock (HCS) and High Conservation Value (HCV) assessments for the areas concerned. PT Ata Marie (Ata Marie) has been appointed by Goodhope to implement an HCS assessment covering the NB and SAP license areas. In addition, collaboration with PT Ekologika, Ata Marie has been contracted to carry out the following studies:

- HCV Assessment
- Peat Land Assessment
- Grievance Mapping.
- Historical Land Clearing Review (LUCA)
- GHG Assessment

Both NB and SAP were formally established in July 2008. All land within the NB/SAP license area was released to each company in 2011 via four co-operatives representing the various sub-ethnic group in Wanggar and Sima villages. Four separate *HGU* licenses for plasma plantations have been established in the name of new co-operatives set up as legal bodies under which the plasma areas are owned (note the plasma holding co-operatives are different from the co-operatives that released the land in 2011).

The HGU documents state a total license area of 21,243 ha. Recalculation using GIS data (shp file) produces an area figure of 21,046 ha. PT Nabire Baru (NB) & PT. Sariwana Adi Perkasa (SAP) has a Carbon Stock and Greenhouse Gas Emissions Assessment Report (June 2018) which contains results:

- Land Cover Classification
- Carbon Stock in PT NB and SAP Area.
 - Carbon Stock in Peat
 - Carbon Stock in Living Biomass
- Integration of High Conservation Value (HCV) Carbon Stocks.
- Proposed Development Scenario for New Planting
- Projected Greenhouse Gas Emissions and Scenario Selection
- Development of Emission Management and Mitigation Management.

7.10.3

Unit of certification has identified pollutions and emissions sources of Nabire Matoa POM for period 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 2020, such as emissions (CO₂, CO), noise, chemical waste, organic and inorganic waste, and infectious waste. Plans to reduce or minimize have been implemented and monitored as explained in Report of Management and Monitoring Implementation of Semester II 2021 and Semester I 2022. Fossil fuel reduction on Nabire Matoa 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

Unit of certification already has a SOP for land clearing as stated in the SOP for Forest to Become Palm Oil Plantation Ref. Code: OP/C2/03/19/03 revised on March 9, 2019 which aims to prepare new land clearing without burning in accordance with applicable regulations. The SOP explains the stages of technical preparation for land clearing (land survey and land evaluation, process of obtaining *HGU*, identification of conservation areas, environmental management and land compensation) and stages of land clearing (spatial planning, pioneering blocking, road construction, clearing of ex-forest land (tripe and fall), mechanical crushing, pile path piling, mechanical crawling, strip chopping). This SOP also explains that the company applies the technique of land clearing without burning (Zero Burning).

In addition, the company also has a SOP for the Preparation Procedure for New Land Development with the Number SOP.EHS.NPP-01 which was issued on March 20, 2016. In Point 5.4, the SOP is explained regarding land clearing activities, namely:

- Adopting land clearing techniques without burning
- Avoid riparian areas as high conservation value areas
- Exclude peatland areas from the planned planting map

- Land suitability assessment and topography must be carried out first through a land suitability survey
- Field conditions and soil types must be used as a reference in the selection of appropriate land preparation methods. Areas with steep slopes (>25°) and have a high level of erosion hazard are avoided from planting to minimize erosion rates and land degradation and avoid work accidents.

The company has shown documents for land clearing activities without burning PT Nabire Baru and PT Sariwana Adi Perkasa. Land clearing activities are indicated by showing evidence of the minutes of inspection and payment map of land clearing activities. The examples of land clearing activities carried out by PT Nabire Baru and PT Sariwana Adi Perkasa are as follows:

- Stacking blocks P18 and P19 of PT Nabire Baru for the period of July 2014 carried out by PT Sinar Karya Agung covering an area of 57.54 Ha.
- Mechanical Felling Activities in Block K35 for the period of July 2014 carried out by PT Sinar Karya Agung covering an area of 31.73 Ha.
- Terrace construction activities in blocks J33, J34, J35, J36, K27, K28, and K29, for the period of May 2014 carried out by PT Sinar Karya Agung for 18110.2 meters.
- Stacking block H25 of PT Sariwana Adi Perkasa for the period of December 2014 carried out by PT Sinar Karya Agung covering an area of 1 Ha.
- Mechanical Felling Activities in blocks G27, G28, H27, H28, J40, J41 and J42 for the period of June 2015 by PT Sinar Karya Agung with a total area of 45.8 ha
- The activity of making terraces in block H25 of PT Sariwana Adi Perkasa for the period of December 2014 carried out by PT Sinar Karya Agung with a length of 1382 meters.

Based on the results of interviews with the company's management, it is known that the company does not yet have a plan related to oil palm replanting. Based on results of field observations to BNE, SWE, KBE, and SSE, it was found that there was no indication of any operational activities using the burn method.

7.11.2

Unit of certification already has SOPs that regulate the prohibition of burning activities in the company's area as well as prevention, prevention and control of fires which are contained in several SOPs, namely as follows:

- SOP.EHS.ERP-03 Emergency Response to Fire and Spills revision 01 dated 11 July 2018. The SOP has the aim of being a guide for preventing and overcoming forest, land, and building fire emergencies to reduce wider impacts and risks, as well as handling on spills of oil, fuel, herbicides, pesticides, POME, CPO, and other hazardous chemicals on company premises and outside the company caused by company activities.
- SOP.EHS.LIM-01 Waste Management revision 02 dated 12 May 2018. In Point 4.3 Waste sources and waste management there is an explanation that domestic office and residential waste cannot be burned.
- SOP FOR FOREST TO BECOME A PALM OIL PLANTATION Ref. Code: OP/C2/03/19/03 revision dated March 9, 2019 which aims to prepare new land clearing without burning in accordance with applicable regulations. The SOP explains the stages of technical preparation for land clearing (land survey and land evaluation, process of obtaining HGU, identification of conservation areas, environmental management and land compensation) and stages of land clearing (spatial planning, pioneering blocking, road construction, clearing of ex-forest land), mechanical crushing, piling track piles, performing mechanical crawling, chopping lines). This SOP also explains that the company applies the technique of land clearing without burning (Zero Burning).

Unit of certification also has a corporate sustainability policy GAHL.SP.SUS.01 (Rev. 01) dated June 25, 2020, stating that Goodhope will maintain a strict zero burning policy, which prohibits burning in its area.

In addition, the company has also shown documents on the structure of the emergency response team of BNE, GMO, Nabire Matoa Mill, the emergency response team of PT Nabire Baru and PT Sariwana Adi Perkasa.

Efforts to prevent and control fires in the managed area have been described in 2022 fire monitoring and prevention report, whose period is between July-September 2022. Based on document verification, there was no land fire in unit of certification's operational areas in that period. Besides, result of interview with relevant agency in Nabire Regency also shows that there was no land fire in unit of certification's operational areas in 2021-2022. Based on results of field observations to BNE, SWE, KBE, and SSE, it was found that there was no indication of any operational activities using the burn method. Based on interviews with management, they cleared the land using heavy equipment (manual).

7.11.3

Unit of certification has involved stakeholders at the border locations of the operational area to prevent and control fires through simulations and socialization of firefighters, which were attended by the surrounding community and several agencies around the unit of certification. Unit of certification has demonstrated evidence of stakeholder involvement in fire prevention and control, as shown below:

- Minutes of fire drill simulation on 25 July 2022 which was attended by 18 participants including representatives of villages around PT NB and PT SAP and the firefighting team.
- Minutes of fire drill simulation on 3 August 2022 which was attended by 20 participants including representatives of villages around PT NB and PT SAP and the firefighting team.

Based on result of interview with Sector Plantation of Animal Husbandry Agency at Nabire Regency, it is known that company already has adequate fire prevention and control facilities and infrastructure, in addition there is no history of fire incidents in the company's concession area within the last 1 year. Based on result of interview with representatives of Sima Village and Wami Village, it is also known that there is no issue of land fires caused by the unit of certification either inside or around the unit of certification's area.

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

Based on the results of document verification, PT Nabire Baru and PT Sariwana Adi Perkasa has started planting since 27 January 2012. HCV Identification activity was carried out by unit of certification is in 2011, 2014, and 2017. Goodhope, the parent of PT Nabire Baru and PT Sariwana Adi Perkasa, has made a disclosure of liability since 2019 to RSPO. Unit of certification shows evidence of communication with the RSPO regarding the LUCA completion on 28 November 2018 with total management area of 20,945.91 Ha of PT Nabire Baru and PT Sariwana Adi Perkasa. Based on LUCA report, PT Nabire Baru and PT Sariwana Adi Perkasa approved on date 07 December 2018 with total Final Conservation Liability 3,370 ha and total remediation area of 571 ha riparian and 122 ha peat. Until this assessment, company did not conduct new land clearing activities or development of operational areas.

7.12.2

Unit of certification has identified HCV area within its operational area. The identification was conducted by independent consultant. These are several HCV assessments which has been conducted by unit of certification.

- HCV assessment in 2011 conducted by Faculty of Forestry, Bogor Agricultural University with the assessor team Ir. Nyoto Santoso MS with 5 team members this assessment only covers PT Nabire Baru with total area 17.000 Ha in accordance with location permit with the result 561.23 Ha or 26.83%. The HCV assessment in 2011 involved a stakeholder, namely Wanggar Pantai Village (attached to 20 participants in the Focus Group Discussion activity).
- HCV Assessment in 2014 by HCV Team of the Faculty of Forestry, IPB, 2014 this assessment cover PT Nabire Baru. The report describes the scope of the study covering an area of 17,000 hectares which refers to the location permit. HCV re-assessment was carried out in October-November 2014. Based on result of the identification, information was obtained on HCV area in PT Nabire Baru covering an area of 672.95 Ha from the study scope of 17,000 Ha (location permit, from the Regent of Nabire No. 74 of 2010 dated 14 July 2010). Re-assessment of HCV in 2014 was carried out with the issuance of HGU of PT Nabire Baru (SK Head of BPN No.159/HGU/BPN RI/2014 with HGU area of 14,508.85 Ha. Details of HCV identified in this assessment shows below.

Location	HCV				Total
	HCV 1.2, HCV 1.3, HCV 4.1	HCV 1.2, HCV 1.3, HCV 4.2	HCV 4.2	HCV 5	
River Ajare	23.99				23.99
Riparian Anak Wanggar 1	7.71				7.71
Riparian Anak Wanggar 2	16.56				16.56
Riparian Anak Womi	17.72				17.72
Riparian Wanggar	41.00				41.00
Hill 1 PT NB		92.01			92.01

Hill 2 PT NB	93.01		93.01
Hill 3 PT NB		96.13	96.13
Hill 4 PT NB		32.12	32.12
Hill Nuhgojaje	73.64		73.64
Hill Nuhre Nuhduge	118.98		118.98
Hill Nuhrei	48.74		48.74
Sago		11.31	11.31
Total	106.99	426.39	672.95

The HCV re-assessment in 2014 involved stakeholders, namely Wami Village and Sima Village, attached with 19 Focus Group Discussion participants from Sima Village and Sima Village, 20 people.

- HCV Assessment in 2017, this assessment carried out due to complaint from NGO. High Conservation Value (HCV) Assessment Documents of PT Nabire Baru and PT. Sariwana Adi Perkasa-Nabire Regency, Papua Province, March-October 2017 in collaboration with Ekologika Consultants. The summary of HCV Assessment Report on 2017 (in collaboration with Ekologika Consultants) consist of the total 9,249 ha, divided into 7,644 ha of main plantation and 1,605 ha on plasma.

Based on the assessments above, HCV determination refers to 2017 assessment with existing HCV attributes being PT Nabire Baru and PT Sariwana Adi Perkasa are HCV 1.1, 1.2, 1.3, 1.4, 2.1, 2.2, 2.3, 4.1, 4.2, 4.3, 5 and 6.

Based on document verifications and interview with managements PT NB and PT SAP have been conducted NPP Procedure as described below:

1. CB verification of compliance with RSPO NPP 2010
Compliance with relevant RSPO Principles and Criteria and RSPO New Planting Procedures (NPP 2010) was verified by the Certification Body BSI. NPP Verification Report was completed in July 2011 for PT NB and in September 2011 for PT SAP. However, no NPP documents were submitted to RSPO since the subsidiary companies were not registered as RSPO members.
2. NPP Public Notifications in RSPO Website
NPP public Notifications available for PT Nabire Baru in RSPO Website on 09 March 2017 (<https://www.rspo.org/certification/new-planting-procedure/public-comments/goodhope-asia-holdings-ltd-pt-nabire-baru>). However, for PT Sariwana Adi Perkasa based on verifications in RSPO Website was not available.

On the RSPO Notification Plan PT Nabire Baru proposed new planting area in its Land Use Title. At the time of this report made, unit of certification is in ongoing activities for clearing and planting. Unit of certification started planting since 27 January 2012, and around 6.659,13 Ha has been planted until end of 2016. Beginning from the year 2011, unit of certification had practiced selective planting in its permit without endangering identified HCV area. The process of land development and planting have followed the RSPO New Planting Procedures (NPP). Unit of certification still have land within its location permit to develop in the future. Unit of certification also has a plan to develop including plasma area (20% of total area utilized) for the surrounding community. Activities undertaken are land acquisition or compensation to landowners in addition to the socialization of plantation development plan or Free Prior and Informed Consent (FPIC). Detail of new planting area is showed in the following table and figure.

PT Nabire Baru	Hectarage (Ha)
Total Planted	6,659.13
- Nucleus Planted	5,843.13
- Plasma Planted	816.00
HCV Area	672.93
Planting Projection 2017 – 2018	7,192.70
Total Land Use	14,524.67

*)The area planted without NPP are subject to sanction as per RSPO Announcement

7.12.3

Based 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 it is not set HFCL for Indonesia.

7.12.4

Unit of certification established HCV management plan to maintain the HCV areas in operation area of PT Nabire Baru and PT Sariwana Adi Perkasa, listed on Management plan HCV 2021/2022 documents. HCV management activities that taken by the management unit are maintain HCV attributes (HCV boundary, sign board), HCV socialization (community and worker), maintain HCV area, regular patrols for maintain HCV security, species monitoring, enrichment in riparian. The management plan has contained type of activities, timeline, PIC, and location. The management and monitoring plan has been referring to the latest HCV document review that is document review March - October 2017 in collaboration with Ekologika Consultants.

HCV management and monitoring implemented that taken by the management unit such as maintain HCV attributes (HCV boundary, sign board), HCV socialization (community and worker), maintain HCV area, regular patrols for maintain HCV security, species monitoring, enrichment in riparian. Management plan HCV 2021/2022 has developed in consultation with relevant stakeholders and covers areas affected.

Base on field visit during audit, for examples on Ubay River Block N21 BNE, Wami River Block I19 SWE, dan Kalibambu River Block E19 KBE, acquired information that company shown proper ways for maintain and protect the catchment area for example manual weeding and marking the chemical boundary border. The auditor found that companies have marked perform revegetation with *bamboo & sago*, and HCV signboard placement. During field visit also found riparian condition were managed well and there are no chemical activity indications on that riparian that become sampling audit.

Based on the results of field visits in the HCV 5 (sago vegetation) area, the HCV management efforts carried out were installing information boards related to the HCV 5 area, determining the boundaries of the HCV 5 area, upkeep sago plants, monitoring the amount of sago vegetation. On December 16, 2019, the company together, the Animal Husbandry and Plantation Service of Nabire Regency and the people of Wanggar Pantai village held enrichment (500 seeds) of sago plants covering an area of 10 Ha. The planted sago yields are also used by the people of Wanggar Pantai village for food reserves, economic improvement and traditional ceremony needs.

7.12.5

Results of the verification documents, field visits and interviews with villagers obtained information that there are areas of HCV-related and affect the local community such as Sago Vegetation Area, Block J16 Sungai Wami Estate. The community is given access rights to utilize sago plants and is one part of the CSR program.

7.12.6

The list of plant and animal species in the estate and around the estate, in the 2017 HCV area identification document, consists of:

- There are 6 types of plants identified, namely 7 species that are included in the IUCN red while for plants there are no species classified as protected according to the attachment of the Minister of Environment and Forestry No.106/MENLHK/SETJENKUM.1/12. of 2018 (latest regulation).
- There are 6 types of protected animals *PermenLHK* Regulation No. 106/ MENLHK/ SETJENKUM.1/ 12. of 2018 for example *spilocus rufoniger* (*cuscus bohaj*), *spilocus maculatus* (*moon cuscus*), and *dorcopsis muelleri* (*lao-lao*).
- For bird species, 21 species classified as protected were identified, for example *Accipiter novaehollandiae* (*elang alap kelabu*), *Rhyticeros plicatus* (*julang irian*), *Aviceda subcristata* (*Pacific baza*), *catatua Galerita* (*kakaktua koki*), *Electus roratus* (*nuri bayan*) and *micropsitta kelensis* (*nuri kate topi*).

On 2021 the company, publish guidebook flora & fauna Goodhope Asia Holding Ltd, PILI GREEN NETWORK which exist on PT Nabire Baru and PT Sariwana Adi Perkasa. The monitored fauna includes mammalian taxa, avian taxa, and taxa herpetofauna (amphibians & reptiles). The faunal taxa were able to identify mammals as many as 16 species of mammals from 9 families, bird taxa recorded as many as 109 species from 38 families, and taxa of reptiles and amphibians (herpetofauna) recorded as many as 25 species (576 individuals) from 12 families. Meanwhile, Plants monitored by plot sampling technique, is for the tree category and added with palms and rattan. From all 5 plot point locations with a total of 65 plots monitoring, recorded as many as 225 plant species from 1119 individuals.

In addition, unit of certification has also carried out socialization about the existence of endangered plants and animals to all employees and the surrounding community, which is shown in the minutes of socialization documents, for example, carried out to

employees on 9 September 2022 (71 participants in KBE), and carried out to the community and contractors on 3 August 2022 (41 participants). All activities can be proven by photos and the document's attached attendance list. Indirect socialization is also carried out by installing information boards with warning signs related to conservation areas and the presence of protected rare plants and animals in easily visible places, such as; area entrances, regional roads that are often crossed by the community, and other sites other strategic areas such as offices and other public facilities.

7.12.7

HCV management activities that taken by unit of certification for period 2022 are maintain HCV attributes (HCV boundary, 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 Nabire Baru and PT Sariwana Adi Perkasa to the Natural Resources Conservation Center of Papua Province date 18 October 2022.

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

7.12.8

Unit of certification shows evidence of communication with the RSPO regarding the LUCA completion on 28 November 2018 with total management area of 20,945.91 Ha of PT Nabire Baru and PT Sariwana Adi Perkasa. Then, unit of certification has also shown progress of Compensation Plan review based on an email on 7 December 2021 RSPO which stated that, *"I am delightful to officially inform you that the compensation plan submitted on 18 Nov (Goodhope NB SAP SHP SSA Remediation and Compensation Plan November 2021) has finally achieved a Satisfactory evaluation results, therefore the RaCP process for Goodhope (PT SHP, PT SSA, PT NB, PT SAP) is now completed and you may proceed with certification"*. Based on these email, PT Nabire Baru and PT Sariwana Adi Perkasa LUCA and Compensation Plan status was declared Satisfactory by RSPO with total Final Conservation Liability 3,475 ha (3,370 Ha PT NB SAP and 105 Ha PT SHP/SSA) and total remediation area of 571 ha riparian and 122 ha peat. Until this assessment, company did not conduct new land clearing activities or development of operational areas.

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√
ASA-1	Certificate holder were not use the certificate and trademark whether on-product or off-product	√
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or√
ASA-1	Certificate holder were not use the certificate and trademark whether on-product or off-product	√
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or√
ASA-1	Certificate holder were not use the certificate and trademark whether on-product or off-product	√
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or√
ASA-1	Certificate holder were not use the certificate and trademark whether on-product or off-product	√
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

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

PT Agro Bukit Time Bound Plan (TBP) is explained in table 1.10. PT Agro Bukit has fifteen (15) management units with seven (7) mills. PT Agro Bukit has informed the TBP progress, MUTU has considered that PT Agro Bukit is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared on September 2022.

MUTU has verified partial certification for un-certified unit's subsidiary of PT Agro Bukit based on their Time Bound Plan. There are eleven (11) uncertified management unit of PT Agro Bukit. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There is no significant land conflicts which have not been declared above.
- The company has followed RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labour disputes that are not being resolved through an agreed process.
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above.
- Based on the latest verification results, there are areas that are still in the process of issuing HGU for an area of 25.5 ha at PT Nabire Baru and 0.2 ha at PT Sariwana Adi Perkasa. Based on BPN's explanation, the company has now filed for land rights and it is planned that within 2 years it will be issued.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p><i>Company Group/Holding Statement:</i> Internal Audit against the uncertified management unit has been carried out.</p> <p><i>Auditor Verification:</i> Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
2.2.2	<p>No replacement after dates defined in NIs Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p><i>Company Group/Holding Statement:</i> RaCP Progress for Goodhope (Uncertified Units):</p> <ol style="list-style-type: none"> 1. PT Karya Makmur Sejahtera, status RaCP Review for LUCA report (Final Conservation Liability) Nol hectare with required to Submit Remediation Plan to RSPO. 2. PT Agro Indomas –East Kalimantan, status RaCP Review for LUCA report with Final Conservation Liability 1,246,29 ha. Goodhope submit request in 19 Dec 2016 to Panel to relook the decision by submit new evidence/document to show that Agro Indomas-East Kalimantan have FCL Nol Hectare. 3. Some PT's Not Applicable to Submit LUCA report due to HCV Assessment was Conduct before Land Clearing activities. We just submit Disclosure Form to RACP: PT Sumber Hasil Prima, PT Sinar Sawit Andalan, PT Agrajaya Baktitama, PT Batu Mas Sejahtera, PT Sawit Makmur Sejahtera, PT Nabire Baru, PT Sariwana Adi perkasa. <p><i>Auditor Verification:</i> 1. PT Karya Makmur Sejahtera</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>The latest information from RSPO Compensation Executive dated 21 June 2016. The recommendations is:</p> <ol style="list-style-type: none"> Clarify the above findings Submit .shp file for potential remediation areas (river.shp files, soil survey .shp files). <p>The company was processing this recommendation.</p> <p>2. PT Agro Indomas-East Kalimantan Based on email from RSPO Compensation Executive dated 28 November 2016; the Liability of PT Agro Indomas Kalimantan Tengah: 0, PT Agro Indomas East Kalimantan with Forest Conservation Liability is 1,246.29 Ha.</p> <p>The company was objection to the result of RSPO review, then the company was sent email dated 29 November 2016 to RSPO. Based on RSPO email dated 15 June 2016, reviewer at the time was rejected the clarification of the company. Currently is the process of preparation for a more bracing justification to convince the panel that there is no liability (0). Then the company was sent justification to RSPO dated 19 December 2016 and the RSPO was response dated 22 December 2016 with answer is this justification will be gift to the reviewer.</p> <p>3. Submit LUCA report: All of companies has conduct identification of HCV and SIA before land clearing, so the companies was no obligation to reporting liability and disclosure to the RSPO. There are information:</p> <ol style="list-style-type: none"> PT Sumber Hasil Prima (HCV&SIA was conducted on September 2010). PT Sinar Sawit Andalan (HCV&SIA was conducted on September 2010). PT Agrajaya Baktitama (HCV&SIA was conducted on January 2010). PT Batu Mas Sejahtera (HCV&SIA was conducted on January 2010). PT Sawit Makmur Sejahtera (HCV&SIA was conducted on January 2010). PT Sariwana Adi Perkasa (HCV&SIA was conducted on January 2011). <p>Auditor Verification: Status of HCV assessments on the HCVRN website for satisfactory PT Nabire, PT Sariwana Adi Perkasa (satisfactory), PT Agrajaya Baktitama (satisfactory), PT Batumas Sejahtera (satisfactory), PT Sawit Makmur Sekahtera (satisfactory), PT Sumber Hasil Prima (under review), PT Sinar Sawit Andalan (under review).</p>
2.2.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement:</p> <ol style="list-style-type: none"> Some PT's already Posting NPP on the RSPO website are: PT Karya Makmur Sejahtera, PT Agro Indomas (East Kalimantan), PT Nabire Baru.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>2. Some PT's was conducted NPP Notification Audit, but the report under review by RSPO and not yet posting on the website: PT Sariwana Adi Perkasa, PT Sumber Hasil Prima, PT Sinar Sawit Andalan, PT Agrajaya Baktitama, PT Batu Mas Sejahtera, PT Sawit Makmur Sejahtera.</p> <p>Auditor Verification:</p> <ol style="list-style-type: none"> 1. PT KMS was conducted NPP Desk Study on January 2015. The notification was posted on 2016 by BSI. 2. PT Nabire Baru was conducted on 4 September 2015 by BSI. 3. PT Sumber Hasil Prima and PT Sinar Sawit Andalan was conducted NPP Desk Study on 4 September 2015 by BSI. 4. PT Sariwana Adi Perkasa is waiting review for HCV report by HCV-RN. 5. PT Agrajaya Baktitama, PT Batu Mas Sejahtera and PT Sawit Makmur Sejahtera was conducted NPP Desk Study on September 2015. It still waiting HCV report review from HCV-RN.
2.2.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>Company Group/Holding Statement:</p> <ol style="list-style-type: none"> 1. PT Sumber Hasil Prima/PT Sinar sawit Andalan: Status Box G: Close for Monitoring 2. PT Nabire Baru, with the status of Complaint Box C: Panel Convened <p>Auditor Verification:</p> <p>PT Sumber Hasil Prima & PT Sinar Sawit Andalan Complaints from Friends of Borneo dated 21 March 2013, The allegations are PT Sumber Hasil Prima and PT Sinar Sawit Handalan has failed to share with the communities effective plans on the development. The companies have also started land clearing works without Hak Guna Usaha. The communities are also disputing the companies right to the lands in the concessions and charging that there has not been a proper FPIC process. The company is also alleged to have used child labour in developing the plantations.</p> <p>Nabire Baru Complaints from Yayasan Pusaka dated 19 April 2016. Allegations:</p> <ol style="list-style-type: none"> 1. Deforestation and plantings on peatlands 2. Irregularities including development without EIA 3. Sima Village within PT Nabire Baru concessions are suffered from severe flooding 4. Failure in following proper FPIC process 5. Excessive use of force including of state security forces <p>Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
2.2.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Company Group/Holding Statement:</p> <p>No</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
2.2.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Company Group/Holding Statement: Yes</p> <p>Auditor Verification :</p> <ol style="list-style-type: none"> 1. PT. Agro Indomas East Kalimantan (AIEK): Land legality compliance still same with NPP notification of PT. Agro Indomas East Kalimantan that reported on 16 June 2016. NPP assessment conducted by BSI. 2. PT. Karya Makmur Sejahtera (KMS): Land legality compliance still same with NPP notification of PT. Karya Makmur Sejahtera that reported on 3 May 2016. NPP assessment conducted by BSI. 3. PT. Nabire Baru (NB): Land legality compliance still same with NPP notification of PT. Nabire Baru that reported on 9 March 2017. NPP assessment conducted by BSI. 4. PT. Sariwana Adi Perkasa (SAP): Land legality compliance still same with last draft NPP notification of PT. Sariwana Adi Perkasa that reported on 9 March 2017. NPP assessment conducted by BSI. 5. PT. Sumber Hasil Prima (SAP): Has have cadastral map no. 06/2018 on 23 April 2018 6. PT. Sinar Sawit Andalan (SSA): Has have cadastral map no. 09/2018 on 02 May 2018. 7. PT. Agrajaya Baktitama (AJB): has held a committee meeting B on September 13, 2017 with minutes No. 48/HGU-HHP/BPN/2017 8. PT. Batu Mas Sejahtera (BMS): there has been an Audit Notification Letter from Committee B (BPN) No. 2740 / 002-8 / 61 / XII / 2017 dated December 5, 2017 for PT Batu Mas Sejahtera 9. PT. Sawit Makmur Sejahtera (SMS): has held a committee meeting B on September 13, 2017 with minutes No. 49 / HGU-HHP / BPN / 2017. <p>Based on the latest verification results, there are areas that are still in the process of issuing HGU for an area of 25.5 ha at PT Nabire Baru and 0.2 ha at PT Sariwana Adi Perkasa. Based on BPN's explanation, the company has now filed for land rights and it is planned that within 2 years it will be issued.</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 Initial Certification

NCR No.	:	2021.01	Issued by	:	Moh Arif Yusni
Date Issued	:	2 November 2021	Time Limit	:	12 Months (9 Months Recommendation)
NC Grade	:	Major	Date of Closing	:	16 November 2021
Standard Ref. & Requirement	:	6.7.1 The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.			
Evidence observed (filled by auditor): The results of document verification and interviews with management obtained information that currently there is a change in the composition of the Committee for Occupational Safety and Health management at PT Nabire Baru because several personnel in the previous management have resigned or been transferred. Furthermore, from the results of interviews with management, it is known that currently the new management has not received approval from the relevant agencies. This is not in accordance with Article 10 of Law Number 1 of 1970 concerning Occupational Safety jo. Regulation of the Minister of Manpower of the Republic of Indonesia No. Per-04/MEN/1987 concerning the Committee for Occupational Safety and Health (P2K3) and Procedures for Appointing Occupational Safety Experts.					
Non-Conformance Description (filled by auditor): The company has not been able to show sufficient evidence of compliance with applicable laws and regulations related to OHS aspects.					
Root Cause Analysis (filled by organization audited): The previous Committee for Occupational Safety and Health management secretary resigned and was replaced by a new secretary who was transferred from a different company. Appointment decree of the substitute Committee for Occupational Safety and Health management secretary in the management process at the Indonesian Ministry of Manpower and Transmigration.					
Correction (filled by organization audited): Follow up Occupational Health and Safety Service Company to immediately get the approval of the Committee for Occupational Safety and Health management secretary's Appointment decree on behalf of Afriyadi from the Indonesian Ministry of Manpower and Transmigration and immediately get approval of the Committee for Occupational Safety and Health management from the Nabire Manpower Office					
Corrective Action (filled by organization audited): In the event of a resignation or transfer, make sure the Decree on the Appointment of a substitute occupational health and safety committee secretary is immediately processed for a maximum of 2 (two) months, then immediately obtain approval from the new occupational health and safety committee administrator from the local government. Conduct regular internal audits to ensure compliance with standards or regulations on sustainability aspects is met.					

Assessor Evaluation and Conclusion (filled by auditor):
Verification November 15, 2021

The company can show proof of improvement in the form of:

- Decree of the Technical Implementation Unit of the Papua Province Manpower Inspection Agency No: 560/04-64/WASNAKER/2021 dated November 9, 2021 regarding the Ratification of the Occupational Safety and Health Development Committee (P2K3) at PT Nabire Baru. The Decree has been completed with the composition of the management committee for the Occupational Safety and Health (P2K3) PT Nabire Baru which consists of Advisors, Chairpersons, Secretaries and Members.
- Certificate from the Director of PT. Patrari Jaya Utama (Occupational Health and Safety Service Company (PJK3) - KEMENAKER RI) No. 699/SKT/PJU/XI/2021 dated November 1, 2021 which explains that on behalf of AFRIYADI BUDI KUSYANTO is in the process of changing the company name from PT Agro Wana Lestari became PT Nabire Baru and Regarding the Change of Company name in the Decree on the Appointment and License of General Occupational Health and Safety Experts are currently still in process at the Indonesian Ministry of Manpower

Regarding the proof of improvement sent, the non-conformance with this indicator is declared to have been fulfilled.

Verified by : **Moh Arif Yusni**

NCR No.	2021.02	Issued by	Radytio Puspanjana
Date Issued	2 September 2021	Time Limit	ASA-1
NC Grade	Minor	Date of Closing	20 November 2021
Standard Ref. & Requirement	7.3.3 The unit of certification does not use open fire for waste disposal.		

Evidence observed (filled by auditor):

The domestic waste management plan has been regulated by the company in:

- SOP.EHS.LIM-01 (Rev. 02) dated 12 May 2018 regarding Waste Management, in Point 4.5 it is stated that the management and monitoring of domestic waste (garbage) generated is sorted and transported to landfills.
- The company Housing Handover Agreement Letter for PT Nabire Baru Employees, for example, letter No. 008/SPST-NB(HRD)/VII/2019 explained in article 2 it is prohibited to carry out all operations of burning in the company's environmental location, including domestic waste.
- The circular letter from General Manager No.012.HR-GM/NB-SAP/VIII/2016 dated August 30, 2016 which explains the prohibition of doing all operations of burning in the company's environmental locations including domestic waste.

As implementation of the plan, during the audit it can be demonstrated:

- The 3-month waste segregation monitoring form, for example, on September 3, 2021 at Barrack C, Sungai Wami Estate, obtained information that domestic waste had been sorted. There is also a monitoring sheet for the disposal of domestic waste into the Wami River Estate landfill which explains the date of disposal, the transport unit, the driver, the amount of waste, the signature of the security, for example the removal of garbage on October 29, 2021 from the Wami River Estate to landfill.
- Documents of socializing company policies and procedures, zero burning policy, including the prohibition of burning domestic waste in plantation and housing complex. The activity will be held on 17 June 2021, 30 June 2021 and 08 July 2021, for Sungai Wami Estate it will be held on 29 May 2021 and 24 June 2021.

However, based on the results of field visits in the mill housing complex and Sungai Wami Estate, there are still residents who are still burning domestic waste/waste in the area around the housing. Related to this, the auditor team considered that the domestic waste management plan was not in accordance with the predetermined plan.

Non-Conformance Description (filled by auditor):

Domestic waste management is not in accordance with existing plans and procedures.

Root Cause Analysis <i>(filled by organization audited):</i> <ul style="list-style-type: none"> • Availability of inadequately placed trash cans • Lack of awareness of housing residents • Lack of supervision from supervisor 	
Correction <i>(filled by organization audited):</i> <ul style="list-style-type: none"> • Disseminate the Zero Burning & Memo 003/PT policy. NB & PT. SAP/HR&GA-GM/VII/2021 to employees and their families (Due date: Nov 20, 2021). • Collecting and cleaning up waste from combustion and sending it to landfill (Due date: Nov 20, 2021). • Provide adequate trash containers in the emplacement. 	
Corrective Action <i>(filled by organization audited):</i> <ul style="list-style-type: none"> • Monitoring zero waste burning every month (PIC: EHS, monthly). • Conducting emplacement monitoring every month to ensure compliance with company policies, procedures and standards (PIC: Doctor/Security/EHS/HoDs/HRD, Nov: 20, 2021). 	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Auditor verification 20 November 2021 <p>The company evidence of improvement in the form of:</p> <ul style="list-style-type: none"> • Documentation of the provision of trash bins in employee housing which is divided into two, namely organic and inorganic waste. • Documentation of activities for collecting and cleaning up burning waste. • Socialization to employees at Sungai Sima Estate regarding regulations in housing complex, prohibition of burning waste, SOP Spraying and Fertilizer and conservation areas on November 15, 2021. • Documentation of the installation of information boards related to housing regulations, one of the points of which is the prohibition of burning garbage. • Socialization to employees at Kali Bambu Estate regarding regulations in housing, prohibition of burning waste SOP Spraying and Fertilizer and conservation areas on November 16, 2021. • Socialization to the drivers regarding the rules in housing, the prohibition of burning garbage on November 16, 2021. • Socialization to employees at Bukit Nugohjaje Estate on the rules of housing, prohibition of burning waste SOP Spraying and Fertilizer and conservation areas on 17 November 2021. • Memorandum of purchase of 200 Liter PVC Drum on November 17, 2021 which will be used as a trash can of 70 Pcs. • Paint notes on November 17, 2021 which will be used as a trash can marker. • Minutes of joint inspections at the housing complex of PT Nabire baru and PT Sariwana Adi Perkasa on November 8-9, 2021 and November 16, 2021 which explains that there is no burning of waste on housing complex. <p>Regarding the evidence improvement submitted, the nonconformity in this indicator is declared to have been fulfilled and will be re-verified at the time of the next assessment.</p>	
Verified by	: Moh Arif Yusni

NCR No.	: 2021.04	Issued by	: Radytio Puspanjana
Date Issued	: 02 November 2021	Time Limit	: 12 Months (9 Months Recommendation)
NC Grade	: Major	Date of Closing	: 10 January 2022
Standard Ref. & Requirement	: 7.8.2 Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).		

Evidence observed (filled by auditor): The plan to protect the Riparian Zone of PT Nabire Baru is contained in the document: <ul style="list-style-type: none"> • The HCV management plan for the period February 2019 – January 2022 is to create a riparian zone apply manual weeding and limit the application of fertilizers and pesticides in the riparian zone that has been planted with oil palm. • SOP for riparian area conservation NO.SOP.EHS.RAC-01 dated October 12, 2021 at point 4.2.6 explains not to carry out chemical activities on riparian conservation areas (for planted areas). In section 4.2.5 the marking of riparian areas is done by painting palm trees 50 m or 100 meters away with a standard 1 meter high painting from the ground with Orange paint so that they are easy to see and monitor. Based on the results of the field visit, it is known that the procedures and plans have not been fully implemented, for example: <ul style="list-style-type: none"> • On riparian of the Wami River – Kali Bambu Estate Block H-20, there is no marker/river boundary area and there are traces of chemical applications on the riparian. • On riparian of the Wami River – Kali Bambu Estate Block J-29, there is no marker/river boundary area and there are traces of chemical applications on the riparian. Non-Conformance Description (filled by auditor): Management of riparian zones is not in accordance with procedures and/or plans.	
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none"> • Frequency monitoring, which is currently being implemented once a year, needs to be done more often, for example every month. • Not all river borders have been marked with spray limits. • Lack of employee understanding and supervision. 	
Correction (filled by organization audited): <ul style="list-style-type: none"> • Install the signboard "LIMITATION OF SPRAYING & FERTILIZING APPLICATIONS". (Due date: Dec 10, 2021). • Installing of the riparian restriction (Due date: Dec 10, 2021). • Socialization and training related to chemical application activities. 	
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> • Carry out regular monitoring of HCV/HCS/Riparian compliance. • Regularly conduct outreach to employees related to the application of chemicals. • The company reaffirmed to employees, foremen and upkeep staff not to apply chemical in the form of spraying & fertilizing activities in HCV/HCS and river equivalent areas at PT NB & SAP (Due date: Nov 20, 2021). 	
Assessor Evaluation and Conclusion (filled by auditor): Auditor verification 10 January 2022 The company can show evidence of improvement in the form of: <ul style="list-style-type: none"> • Documentation of the installation of spray and fertilizer limit signs on riparian November 24, 2020 at PT Nabire Baru and PT Sariwana Adi Perkasa on Blocks J28, J29, J30, J31, K30, H19 and H20. • Documentation of the installation of HCV / Riparian area on 24 November 2020 at PT Nabire Baru and PT Sariwana Adi Perkasa on Blocks J28, J29, J30, J31, K30, H20, H21 and H 22. • Map of river locations and chemical application prohibition points. • Socialization to employees at Sungai Sima Estate regarding regulations in housing complex, prohibition of burning waste SOP Spraying and Fertilizer and conservation areas on November 15, 2021. • Socialization to employees at Kali Bambu Estate regarding regulations in housing complex, prohibition of burning waste SOP Spraying and Fertilizer and conservation areas on November 16, 2021. • Socialization to the drivers regarding the rules in housing, the prohibition of burning garbage on November 16, 2021. • Socialization to employees at Bukit Nugohjaje Estate regarding regulations in housing complex, prohibition of burning waste SOP Spraying and Fertilizer and conservation areas on November 17, 2021. 	

- Results of the Monthly Environmental and OHS Inspection Checklist for the HCV section where one of the points checked is the HCV boundary mark, former vegetation that was sprayed and the condition of the boundary of the conservation area

Regarding the proof of improvement submitted, the discrepancy in this indicator is declared to have been fulfilled and will be re-verified on next assessment.

<i>Verified by</i>	:	Moh Arif Yusni
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3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-1

NCR No.	:	-	Issued by	:	-
Date Issued	:	-	Time Limit	:	-
NC Grade	:	-	Date of Closing	:	-
Standard Ref. & Requirement	:	-			
Evidence observed (filled by auditor):					
Non-Conformance Description (filled by auditor):					
There is no nonconformity during audit ASA-1 RSPO PT Nabire Baru and PT Sariwana Adi Perkasa					
Root Cause Analysis (filled by organization audited):					
Correction (filled by organization audited):					
Corrective Action (filled by organization audited):					
Assessor Evaluation and Conclusion (filled by auditor):					
Verified by	:				

3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	3.6.2	<p>The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>The certification unit has a plan for health checks for all employees which is contained in the Annual Medical Check Up and High Risk Medical Check Up documents for the 2022 period. The document informs the plan to carry out periodic and special health checks for all workers. As a form of implementation of the health examination program, the certification unit shows the results of the general and special MCU examination records, which are as follows:</p> <ul style="list-style-type: none"> • General health examination (annual MCU) is conducted once a year periodically for all workers. Periodic health checks have been carried out since January 2022 and the last time was in September 2022. From the results of these inspections, information was obtained that a total of 256 workers out of a total of 1,838 workers at PT Nabire Baru and PT SAP had their health checked. The management representative stated that the general MCU will continue until December 2022 until all workers have been inspected. • Audiometric examination was carried out in May 2022. There were 57 Mill and CWS workers who were examined and from the recording of the results of the examination it was known that 7 mill workers and 2 CWS workers had mild, moderate and moderate-severe hearing loss. A follow-up examination is planned for November 2022. • The spirometry examination was carried out in September 2022. A total of 269 spray and fertilizer workers at PT Nabire Baru and PT Sariwana Adi Perkasa were examined and the results of the examination revealed that 43 workers had mild pulmonary restrictions. A follow-up examination is planned for November 2022. <p>The certification unit has the opportunity to realize periodic health checks and immediately follow up on special MCU examinations according to the planned schedule.</p>

3.4.4. Noteworthy Positive Components

No	Description
1	Consistency on RSPO assessment process
2	Good relationship with auditee
3	Information Transparency on audit process.



3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Sector Plantation of Animal Husbandry Agency at Nabire Regency Wednesday, October 19th, 2022 <ul style="list-style-type: none"> The last visit was in August 2022. The plantation business appraisal will end at the end of the year (December) 2022. The company is in the process of the latest plantation business appraisal at this time. In general, the company has routinely sent mandatory reports such as the Plantation Business Progress Report every 6 (six) months and for the January-June 2022 period it was sent in July 2022. There are no negative issues from the community around the company related to disturbances caused by the company's operational activities. The company already has adequate fire prevention and control facilities and infrastructure, in addition there is no history of fire incidents in the company's concession area within the last 1 year. Routinely report on land fires and CSR. Communication between agencies and companies has been well established. 	<p>There are no negative issues from the Sector Plantation of Animal Husbandry Department.</p>
Manpower and Transmigration Agency at Nabire Regency Wednesday, October 19th, 2022 <ul style="list-style-type: none"> The last visit was in June 2022. Then in March 2022, the Office has also carried out supervision and inspection of K3 equipment in the company. Routinely carry out Mandatory Manpower Reports online according to a predetermined schedule. Has implemented the minimum wage applicable in Papua Province in 2022 and provided other benefits to workers Has included its workers in the BPJS Employment and Health program. Reporting and ratification of Company Regulations (PP) has been carried out at the Nabire Regency Manpower and Transmigration Office. During the past year there were no negative issues related to child labor, forced labor, illegal labor, discrimination, sexual harassment, etc. In addition, there are no requests for mediation related to industrial relations issues from workers/companies. 	<p>There are no negative issues from the Manpower and Transmigration Agency.</p>
Bipartit Main and Sub Committee of PT Nabire Baru & PT Sariwana Adi Perkasa.	

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Currently, the company does not have a union because the workers do not want to form a union in the near future, so the company took the initiative to form a Bipartite Committee. The Bipartite Committee itself has been formed since the previous assessment. This Bipartite Committee has also been approved by the Manpower and Transmigration Office of Nabire Regency. The composition of workers' representatives and employers' representatives is balanced/equal so that there will be no dominance during the operation of the organization. In addition, in the management there is a facilitator as an intermediary.</p> <p>Bipartite meeting if there are several things that need further confirmation from the workers and employers, but not every month. Where later at the meeting, the best solution will be sought together from the point of view of workers and employers. Since 2021 until now (September 2022) the company has properly implemented government regulations related to employment and OHS such as the provision of minimum wages, calculation of overtime, provision of PPE, BPJS and other things that are the rights of workers and obligations that must be given. by the company has been implemented. There has never been an activity of harassment, violence, child labor, or human trafficking that has occurred since 2021 until the audit activity is carried out (September 2022).</p>	<p>The company already has a Bipartite LKS which has been approved by the Manpower and Transmigration Office of Nabire Regency in 2021 for PT Nabire Baru and PT Sariwana Adi Perkasa. Regulations related to minimum wages, overtime calculations, provision of PPE, BPJS and other matters have been implemented so that there are no issues related to wages from January to September 2022.</p> <p>There were also no issues/incidents related to harassment, violence, child labor, or human trafficking that occurred since 2021 until audit activities were carried out within the company.</p>
<p>Environmental Service Agency at Nabire Regency Wednesday, October 19th, 2022</p> <ul style="list-style-type: none"> • The last visit was in December 2021. • The company already has a valid environmental permit, liquid waste utilization permit, and hazardous waste storage permit. • The company routinely submits mandatory reports such as RKL-RPL reports, B3 waste management reports, and liquid waste management reports to the Environment Agency. • The Environment Agency routinely conducts surveillance at PT Nabire Baru. The results of the control showed that there were no negative issues or reports related to the environment from the community, and up to the time of the audit there were no negative complaints/issues from the surrounding community. • Communication between the company and the Nabire District Environmental Office went smoothly. • Regarding medical waste management, the Dinas has advised companies to communicate with hospitals around Nabire Regency that already have a medical waste disposal permit. However, there has been no reporting update so far. 	<p>There are no negative issues from the Environmental Service Agency</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
National Land Agency at Nabire Regency Saturday, October 22nd, 2022. <ul style="list-style-type: none"> The last visit was in June 2022. No complaints from the surrounding community were submitted to the Nabire Regency BPN The company has submitted regular reports regarding the use of HGU to the Nabire Regency BPN. Communication between the company and Nabire Regency BPN is going well. 	<p>There are no negative issues from the National Land Agency</p>
Surrounding Community Representatives Interviewee: <ul style="list-style-type: none"> Wate Tribe Sarakwari & Koroba Sub-Tribe of Yerisiam Tribe Waoha Sub-Tribe of Yerisiam Tribe Akaba Sub-Tribe of Yerisiam Tribe Sima Village Wami Village <ul style="list-style-type: none"> Relationship between unit of certification and tribes around the unit of certification is in good condition. There were problems with the opening of plantations at the beginning of development due to disagreements within the tribe. However, the problem has been resolved internally, Plasma is already running and payments to cooperatives have started. Regarding flooding, flooding around the unit of certification's area or in community areas has been around for a long time. Due to tidal flooding caused by rising sea levels. There is no issue of land fires caused by the unit of certification either inside or around the unit of certification's area. There is no dispute between the unit of certification and the surrounding community. CSR that has been carried out by the unit of certification includes programs in the fields of education, health, infrastructure, and social. In addition, the unit of certification also participates in maintaining local wisdom that exists in indigenous peoples. 	<p>Based on result of interview, document verification, and field visits, it is known that there are no negative issues between unit of certification and community in general or indigenous peoples around the unit of certification. This good relationship has been established in a conducive atmosphere until this assessment is carried out.</p>
Plasma Cooperative Representatives Interviewee: <ul style="list-style-type: none"> KPMA Wate Asiaina KPMA Waoha KPMA Akaba KPMA Sarakwari & Koroba <ul style="list-style-type: none"> Relationship between unit of certification and plasma cooperatives is in good condition. The land owned by plasma cooperative members is fully 	<p>In general, the community feels very helped by plasma development program for indigenous community, and has a positive impact on the economic life of the community. In addition,</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>managed by the unit of certification. Employment opportunities are open to local community including cooperative members who wish to register as workers in the unit of certification.</p> <ul style="list-style-type: none"> The management of the cooperative obtains information on FFB prices from the unit of certification's PR and representatives of the provincial pricing team every month. The price information provided is in accordance with the provisions and is transparent. FFB payments are made every 3 months. Examination of the calculation of the price paid is checked in advance by the cooperative to obtain approval. So far, the payment value is carried out in accordance with the relevant regulations. Unit of certification has provided socialization related to RSPO certification, as well as providing an understanding of the management of conservation areas located within the plasma area. 	<p>the cooperative has been given socialization about RSPO certification systems, so that they understand the importance of maintaining conservation areas that are in plasma plantation management areas.</p>
<p>Local Contractor of CPO and PK Transporter (CV Mitra Lintas Borneo) Interviewee: Head of Operational</p> <ul style="list-style-type: none"> Contractor has been working with unit of certification since palm oil mill started, and is bound by a contract which is renewed every year. PT Nabire Baru has provided socialization related to company regulations, company code of ethics, compliance with PPE payments, and technical work. PPE for contractor workers is provided by the contractor according to unit of certification's policy. Compliance checks on the use of PPE are carried out by unit of certification at the work site. Payment of contract value is carried out in accordance with mutual agreement and on time. There is no complaint from contractor regarding cooperation with the unit of certification. 	<p>Based on the result of interview and document review, it is known that there are no negative issues in the cooperation between unit of certification and contractor. This good relationship has been established in a conducive atmosphere until this assessment is carried out.</p>
<p>Gender Committee of PT Nabire Baru and PT Sariwana Adi Perkasa (Estate & Mill).</p> <p>The gender committee has been organized since the previous year with management from among workers and staff, where the management/members consist of male and female workers. Since 2021 there have been no issues related to gender, harassment, violence or serious violations of reproductive rights in the company's environment. It is now certain that none of the workers who work with chemicals are pregnant or lactating women, this is because the company has its own policy regarding the prohibition of female workers who are pregnant or breastfeeding from working on jobs related to chemicals.</p>	<p>There are no issues related to gender, harassment, violence or serious violations of reproductive rights in the company's environment.</p>

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

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Comm	Date of Contact	Response	
						Yes	No
1	Sector Plantation of Animal Husbandry Agency	Nabire Regency	-	Via Phone	October 19 th , 2022	✓	
2	Manpower and Transmigration Agency	Nabire Regency	-	Via Phone	October 19 th , 2022	✓	
3	Environmental Service Agency	Nabire Regency	-	Via Phone	October 19 th , 2022	✓	
4	National Land Agency	Nabire Regency	-	Via Phone	October 22 nd , 2022	✓	
5	Bipartit Main and Sub Committee of PT Nabire Baru & PT Sariwana Adi Perkasa	Nabire Regency	-	Direct Interview	October 19 th , 2022	✓	
6	Gender Committee of PT Nabire Baru and PT Sariwana Adi Perkasa (Estate & Mill).	Nabire Regency	-	Direct Interview	October 19 th , 2022	✓	
7	Bukit Nuhgojaje Estate & KPMA Wate Asiana: <ul style="list-style-type: none"> • 5 harvest workers + 2 supervisor (<i>mandor</i>) • 3 pick up loose fruit workers • 2 spray workers • 4 transport FFB workers • 1 storage operator • 1 genset operator • 2 residents of housing complex 	Nabire Regency	-	Direct Interview	October 18 th , 2022	✓	
8	Sungai Wami Estate: <ul style="list-style-type: none"> • 4 harvest workers • 7 pick up loose fruit workers • 2 spray workers + 1 supervisor (<i>mandor</i>) • 4 transport FFB workers • 1 storage operator • 2 workshop operators • 2 residents of housing complex • 1 daycare worker • 1 Matoa Mart Cooperative • 1 doctor 	Nabire Regency	-	Direct Interview	October 20 th , 2022	✓	
9	Kali Bambu Estate & KPMA Waoha: <ul style="list-style-type: none"> • 7 harvest workers + 2 supervisor (<i>mandor</i>) 	Nabire Regency	-	Direct Interview	October 21 st , 2022	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Comm	Date of Contact	Response	
						Yes	No
	<ul style="list-style-type: none"> • 5 pick up loose fruit workers • 4 transport FFB workers • 1 storage operator • 1 workshop operator • 2 residents of housing complex • 2 daycare workers 						
10	Sungai Sima Estate & KPMA Sarakwari and Karoba: <ul style="list-style-type: none"> • 8 harvest workers + 1 supervisor (<i>mandor</i>) • 6 pick up loose fruit workers • 3 pruning workers • 1 transport FFB worker • 1 storage operator • 1 resident of housing complex 	Nabire Regency	-	Direct Interview	October 22 nd , 2022	✓	
11	Nabire Matoa Mill: <ul style="list-style-type: none"> • 1 operator grading + 1 supervisor (<i>mandor</i>) • 1 operator loading ramp • 1 operator sterilizer • 1 operator press • 1 operator kernel • 1 operator boiler • 1 operator clarification • 1 operator engine room • 1 WTP operators • 1 resident of housing complex • 1 daycare worker • 1 WWTP operator • 3 mechanics • 2 warehouse officer 	Nabire Regency	-	Direct Interview	October 20 th , 2022	✓	
12	Surrounding Community Representatives: <ul style="list-style-type: none"> • Wate Tribe • Sarakwari & Koroba Sub-Tribe of Yerisiam Tribe • Waoha Sub-Tribe of Yerisiam Tribe • Akaba Sub-Tribe of Yerisiam Tribe 	Nabire Regency	-	Stakeholders meeting	October 19 th , 2022	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Comm	Date of Contact	Response	
						Yes	No
	<ul style="list-style-type: none"> Sima Village Wami Village 						
13	Plasma Cooperative Representatives: <ul style="list-style-type: none"> KPMA Wate Asiaina KPMA Waoha KPMA Akaba KPMA Sarakwari & Koroba 	Nabire Regency	-	Stakeholders meeting	October 19 th , 2022	✓	
14	Local Contractor (CV Mitra Lintas Borneo)	Nabire Regency	-	Stakeholders meeting	October 19 th , 2022	✓	
15	WWF	Indonesia	wwf-indonesia@wwf.or.id	Via email	October 10 th , 2022		✓
16	WALHI	Indonesia	informasi@walhi.or.id	Via email	October 10 th , 2022		✓
17	Sawit Watch	Indonesia	info@sawitwatch.or.id	Via email	October 10 th , 2022		✓
18	AMAN	Indonesia	rumahaman@aman.or.id	Via email	October 10 th , 2022		✓

Appendix 2. Assessment Program

DATE	17 – 26 October 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 17 October 2022		
00.10 – 11.10	JAKARTA (CGK) → JAYAPURA (DJJ) : ID-6182 → NABIRE (NBX) :IW-1629	All Auditor
12.00 – 14.00	NABIRE – PT NABIRE BARU	All Auditor
14.30 – 16.00	Opening meeting <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	All Auditor
16.00 – 17.00	Verification of Basic Information: <ul style="list-style-type: none"> FFB Production Data Scope of Certification Map 	All Auditor
Tuesday, 18 October 2022		
08.00 – 12.00	Field Observation to Bukit Nuhgojaje and KPMA Wate Asiaina Aspect to be verified: <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). Interview with related personnel during field observation. 	BSH RGR & SDU BSH RGR & SDU RGR & SDU ERL RGR, SDU & ERL
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> Document review and completing audit checklist. Presentation of Daily Progress. 	All Auditor
Wednesday, 19 October 2022		
08.00 – 12.00	<ul style="list-style-type: none"> public consultation with stakeholder to relevant agency in Nabire Regency Stakeholder consultation to affected communities surrounding the plantations and previous land owner. Document review and completing audit checklist. 	BSH & SDU RGR & ERL All Auditor
12.00 – 14.00	Break	All Auditor

DATE	17 – 26 October 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
14.05 – 17.00	<ul style="list-style-type: none"> Document review and completing audit checklist. Stakeholder Interview: <ul style="list-style-type: none"> Gender Committee, Worker Union, Worker Cooperation Local Contractor for Mill and Estate Third Parties Supplier Presentation of Daily Progress. 	All Auditor RGR ERL & SDU BSH All Auditor
Thursday, 20 October 2022		
08.00 – 12.00	Field Observation to Sungai Warni Estate and KPMA Waoha Aspect to be verified: <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). Interview with related personnel during field observation. 	BSH RGR & SDU BSH RGR & SDU RGR & SDU ERL RGR, SDU & ERL
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Field observation to Nabire Matoa Mill: <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Dispatch CPO) Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond) of Employment Procedure and Mechanism Aspect <ul style="list-style-type: none"> Presentation of Daily Progress 	BSH & SDU ERL RGR All Auditor
Friday, 21 October 2022		
08.00 – 12.00	Field Observation to Kali Bambu Estate Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). Interview with related personnel during field observation. 	BSH RGR & SDU BSH RGR & SDU RGR & SDU ERL RGR, SDU & ERL
12.00 – 14.00	Break	All Auditor

DATE	17 – 26 October 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
14.00 – 17.00	<ul style="list-style-type: none"> Document review and completing audit checklist. Presentation of Daily Progress. 	All Auditor
Saturday, 22 October 2022		
08.00 – 12.00	Field Observation to Sungai Sima Estate and KPMA Sarakwari & Koroba Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). Interview with related personnel during field observation. 	BSH RGR & SDU BSH RGR & SDU RGR & SDU ERL RGR, SDU & ERL
Monday, 24 October 2022		
08.00 – 12.00	Document review and completing audit checklist.	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> Document review and completing audit checklist. Presentation of Daily Progress. 	All Auditor
Tuesday, 25 October 2022		
09.00 – 11.00	Document review and completing audit checklist.	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.00	Team Auditor Internal Discussion	All Auditor
16.00 – 17.00	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 	All Auditor
Wednesday, 26 October 2022		
11.30 – 19.05	NABIRE (NBX) → MANOKWARI (MKW) : IW-1557 → JAKARTA (CGK) :ID-6155	All Auditor