

Roundtable on Sustainable Palm Oil Certification R S P O

[✓] Surveillance

Name of Management : Rimba Harapan Sakti Palm Oil Mill - PT Rimba Harapan Sakti, subsidiary of
 Organisation Wilmar International Ltd.
 Plantation Name : PT Rimba Harapan Sakti - Rimba Harapan Sakti-1 Estate and Rimba Harapan
 Sakti-2 Estate
 Location : Village of Pematang Limau, Sub District of Seruyan Hilir, District of Seruyan,
 Province of Kalimantan Tengah, Indonesia
 Certificate Code : MUTU-RSPO/083
 Date of Initial Registration : 08 December 2015
 Date of Last Issued : 22 October 2020 Date of License Issue : 08 January 2023
 Date of Certificate Expiry : 07 December 2025 Date of License Expiry : 07 December 2023

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.2	05 to 09 September 2022	Haikal Ramadhan Kharismansyah (Lead Auditor), Afiffuddin, Erika Lucitawati, Kiki Fadli	Moh Arif Yusni	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.2	05 December 2022

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Figure 1. Location Map of PT Rimba Harapan Sakti

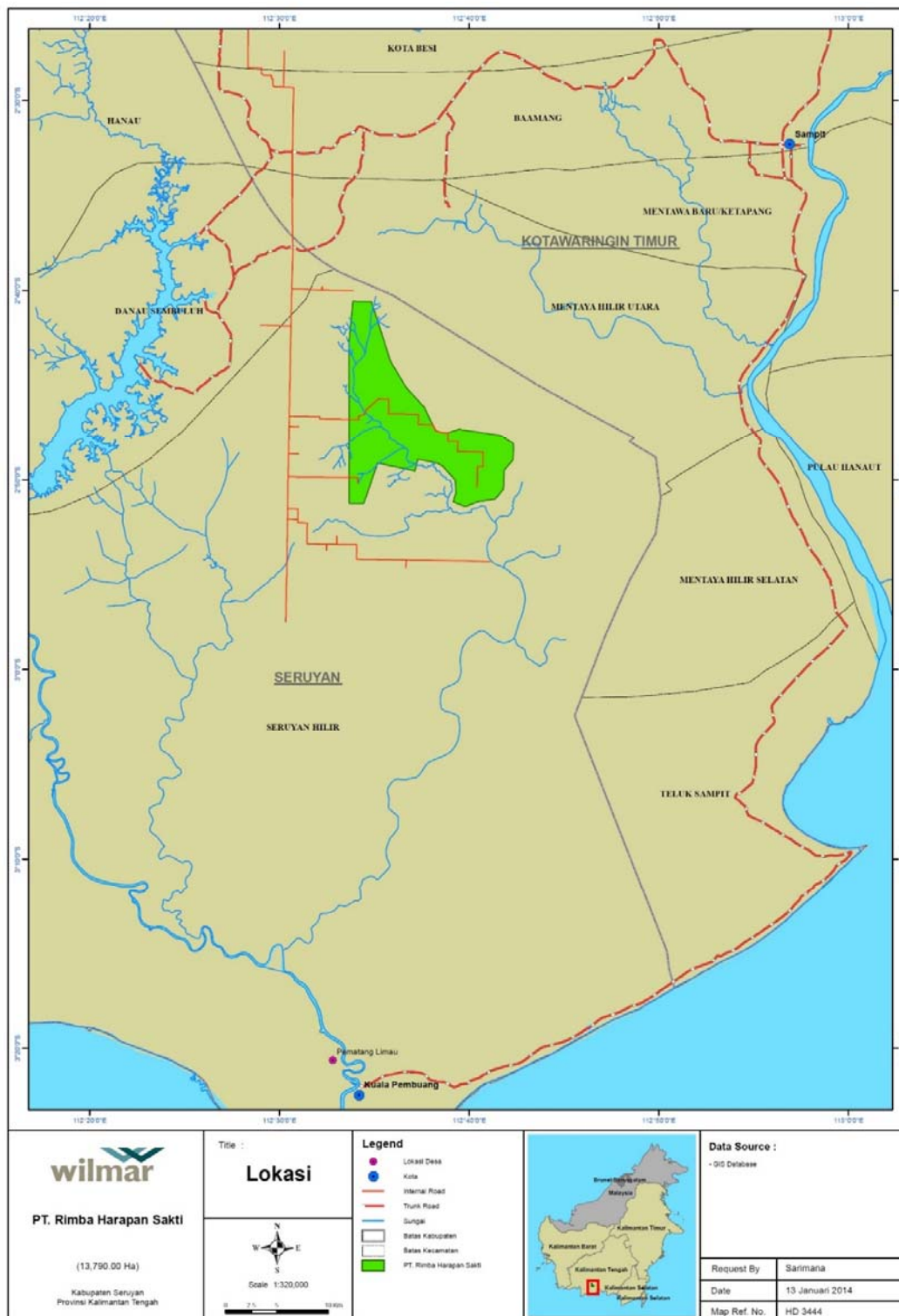
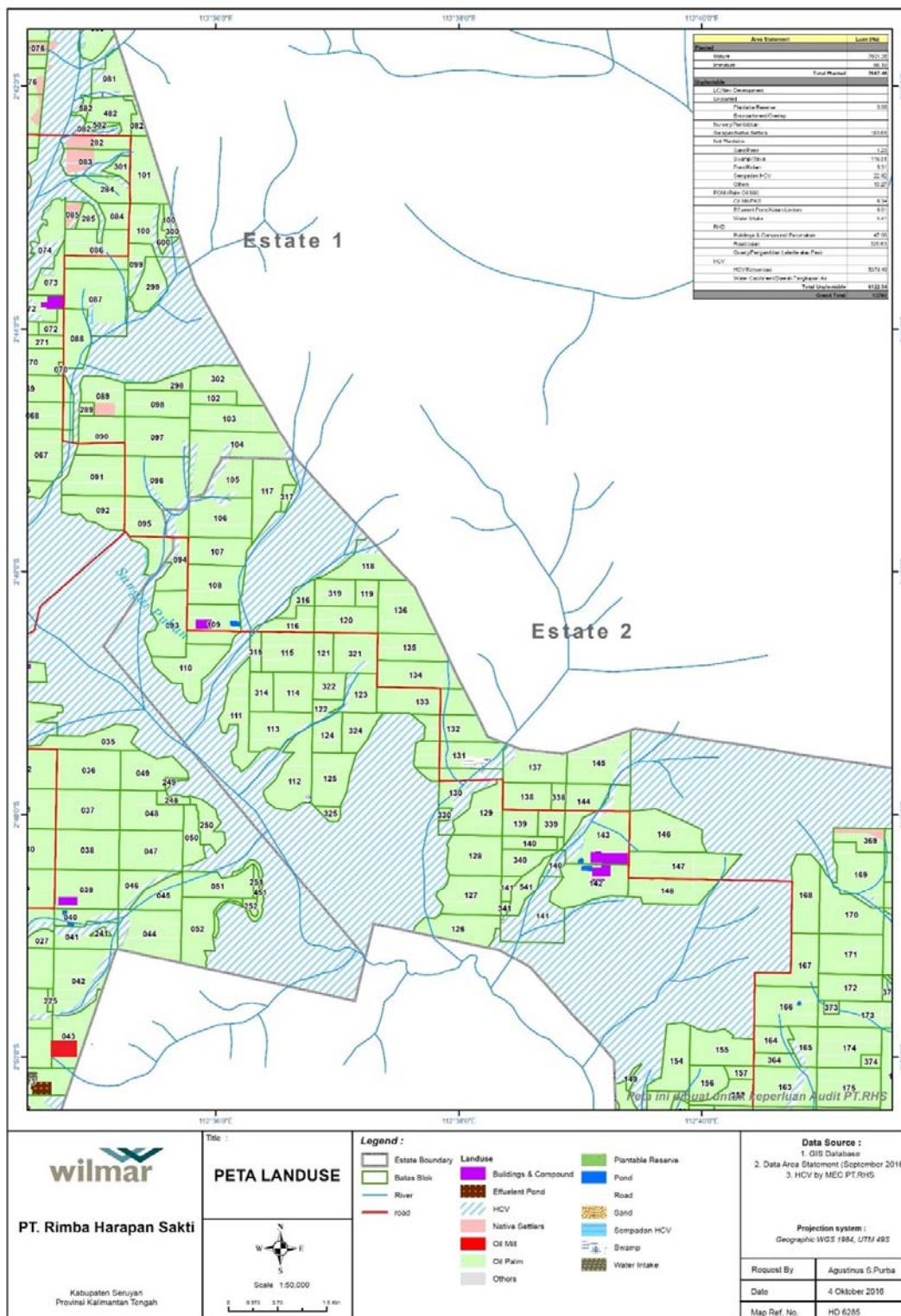


Figure 2. Operational Map of PT Rimba Harapan Sakti



Abbreviations Used

AMDAL	:	<i>Analisis Mengenai Dampak Lingkungan</i> (Environmental Impact Analysis)
ASA	:	Annual Surveillance Assessment
BIE	:	Bilah Estate
BMP	:	Best Management Practices
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Insurance)
CB	:	Certification Body
CH	:	Certificate Holder
CLA	:	Collective Labor Agreement
CPO	:	Crude palm oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
DLH	:	<i>Dinas Lingkungan Hidup</i> (Environment Agency)
EFB	:	Empty Fruit Bunches
EIA	:	Environment Impact Assessment
FFB	:	Fresh Fruit Bunch
FPIC	:	Free, Prior, Informed and Consent
FR	:	Fatality Rate
GHG	:	Green House Gas
HCS	:	High Carbon Stock
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title/Right)
HK	:	<i>Hari Kerja</i> (Working Day)
ILO	:	International Labor Organization
IPM	:	Integrated Pest Management
ISCC	:	International Sustainability Carbon Certification
ISPO	:	Indonesia Sustainable Palm Oil
IUP	:	<i>Izin Usaha Perkebunan</i> (Plantation Business Permit)
JK	:	<i>Jaminan Kematian</i> (Died Insurance)
JKK	:	<i>Jaminan Kecelakaan Kerja</i> (Work Accident Insurance)
KMS	:	<i>Koperasi Makmur Sejahtera</i> (Makmur Sejahtera Cooperative)
KSJ	:	Kerry Sawit
KUD	:	<i>Koperasi Unit Desa</i> (Cooperative)
kWh	:	Kilowatt hour
LA	:	Land Application
LCC	:	Legume Cover Crop
LD	:	Lethal Dosage
MCU	:	Medical Check Up
MOU	:	Memorandum of Understanding
MSDS	:	Material Safety Data Sheet
MSPO	:	Malaysia Sustainable Palm Oil
NGO	:	Non-Government Organization
OFI	:	Opportunity For Improvement
OHS	:	Occupational Health and Safety
PIC	:	Person In Charge
PK	:	Palm Kernel
PLC	:	Public Limited Company
POM	:	Palm Oil Mill

POME	:	Palm Oil Mill Effluent
PP	:	<i>Peraturan Pemerintah</i> (Government Regulation)
PPE	:	Personal Protective Equipment
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i>
PT	:	<i>Perseroan Terbatas</i> / Limited Corporation
QC	:	Quality Control
RHS	:	Rimba Harapan Sakti
RKL-RPL	:	<i>Rencana Pengelolaan dan Pemantauan Lingkungan</i> (Environment Management and Monitoring Plan)
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened and Endangered
SCCS	:	Supply Chain Certification System
SIA	:	Social Impact Assessment
SOP	:	Standard Operations Procedure
SR	:	Severity Rate
STP	:	Sarana Titian Permata
UNFCCC	:	United Nations Framework Convention on Climate Change
WTP	:	Water Treatment Plan
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none">Indonesia National Interpretation RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSPO Board of Governors on 20th April 2020RSPO Certifications Systems for Principles & Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020)	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT Rimba Harapan Sakti subsidiary of Wilmar International Limited.	
1.2.2	Contact person	Jules Sonny Parapat	
1.2.3	Organisation address and site address	<ul style="list-style-type: none"><u>RSPO registered company:</u> 56 Neil Road Singapore, Singapore 088 030.<u>Indonesian Head Office:</u> Multivision Tower Lt. 15 Jl. Kuningan Mulya Blok B9, Kuningan, Jakarta 12980 – Indonesia.	
1.2.4	Telephone	(62-21) 2938 0777	
1.2.5	Fax	-	
1.2.6	E-mail	jules.parapat@id.wilmar-intl.com	
1.2.7	Web page address	www.wilmar-international.com	
1.2.8	Management Representative who completed the application for certification	Jules Sonny Parapat (Indonesia Certification Lead)	
1.2.9	Registered as RSPO member	2-0017-05-000-00, 16 th August 2005	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: Rimba Harapan Sakti Mill, Rimba Harapan Sakti-1 Estate, Rimba Harapan Sakti-2 Estate.	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	<div>Coordinate</div> <div>LatitudeLongitude</div>
	Rimba Harapan Sakti POM	Pematang Limau Village, Sub District of Seruyan Hilir, Seruyan District, Province of Kalimantan Tengah, Indonesia	S 02° 50' 09"E 112° 34' 22"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	<div>Coordinate</div> <div>LatitudeLongitude</div>
	Rimba Harapan Sakti-1 Estate	Pematang Limau Village, Sub District of Seruyan Hilir, Seruyan District, Province of Kalimantan Tengah, Indonesia	S 02° 46' 39"E 112° 34' 14"
	Rimba Harapan Sakti-	Pematang Limau Village, Sub District of	S 02° 48' 23"E 112° 39' 21"

	2 Estate	Seruyan Hilir, Seruyan District, Province of Kalimantan Tengah, Indonesia					
1.5	Description of Area Statement						
1.5.1	Tenure						
	• State		13,789.75	Ha			
	• Community		-	Ha			
1.5.2	Area Statement						
	• Total area		13,789.75	Ha			
	• Mature area		7,687.43	Ha			
	• Immature area		29.27	Ha			
	• Road, housing, drainage		371.45	Ha			
	• Mill		17.36	Ha			
	• HCV		5,379.45	Ha			
	• Occupation		125.34	Ha			
	• Unplantable		179.45	Ha			
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)					
		RHS-1 Estate	RHS-2 Estate	Total			
	2009	2,607.58	692.44	3,300.02			
	2010	638.82	2,558.81	3,197.63			
	2011	180.57	234.62	415.19			
	2012	437.82	132.53	570.35			
	2013	129.80	44.15	173.95			
	2016	24.09	-	24.09			
	2018	-	6.20	6.20			
	Sub Total Mature	4,018.68	3,668.75	7,687.43			
	2020	29.27	-	29.27			
	Sub Total Immature	29.27	-	29.27			
	TOTAL	4,047.95	3,668.75	7,716.70			
1.6.2	New Planting area after January 2010		- Ha				
1.6.3	Planting Cycle		2 nd Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO	Palm Kernel		
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	RHS POM	45	189,528.61	38,504.48	20.31	8,288.44	4,37
	*Production data source from September 2021 – August 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/h a/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	RHS-1 Estate	7,043.40	4,018.68	95,963.09	23.87	90,737.50	94.55
	RHS-2 Estate	6,746.35	3,668.75	69,296.89	18.92	65,553.24	94.59
	TOTAL	13,789.75	7,687.43	165,259.98	21.51	156,290.74	94.57
	*Production data source from September 2021 – August 2022 *A few of RHS-1 FFB were sent to KSY POM-1, KSY POM 2, and STP POM-2 *A few of RHS-2 FFB were sent to KSY POM-1 and STP POM-2						
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)		
	KSY 2 Estate	PT Kerry Sawit Indonesia (Wilmar)	-	4,788.81	801.46		
	KSY 3 Estate	PT Kerry Sawit Indonesia (Wilmar)	-	2,514.83	17,055.06		
	Total Certified					17,856.50	
	STP 1 Estate	PT Sarana Titian Permata (Wilmar)	-	5,312.52	50.20		
	STP 2 Estate		-	6,324.52	1,299.62		
	STP 3 Estate		-	5,285.08	1,753.48		
	KUD Kosudra	KSY Scheme Smallholder	568	1,031.38	8,481.44		
	KUD KMS	PT Rimba Harapan Sakti (Wilmar) Scheme Smallholder	355	364,54	2,878.33		
	KUD Sejahtera	KSY Scheme Smallholder	435	856.67	219.14		
	TBS STP POM2	PT Sarana Titian Permata (Wilmar)	-	-	841.57		
	Total Uncertified					15,523.78	
	TOTAL					33,380.30	
		*Production data source from September 2021 – August 2022					
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product			Last Year Projected Certified Volume (02 February to 07 December 2022) (MT)		Last Year Actual Certified Volume (February to August 2022) (MT)	
	FFB Processed			157,500		142,839.91	
	CPO Production			35,440		26,120.23	
	PK Production			7,875		5,696.20	
	*License period is start from 02 February 2022 until 07 December 2022						
1.8.2	Product selling						
	Type of selling product			Actual selling product for last year (February to August 2022) (MT)			
	CSPO sold as RSPO certified product			25,801.88			
	CSPK sold as RSPO certified product			5,596.66			
	CSPO sold under other scheme			0			
	CSPK sold under other scheme			0			

	CSPO sold as conventional				0			
	CSPK sold as conventional				0			
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates		Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	RHS 1 Estate		7,043.40	4,018.68	95,300	23.71		
	RHS 2 Estate		6,746.35	3,668.75	68,900	18.78		
	TOTAL		13,789.75	7,687.43	164,200	21.36		
*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		Palm Kernel		Supply Chain Module
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	RHS Mill	45	164,200	36,200	22.00	7,400	4.50	MB
*Projected CSPO and CSPK production for 12 months of certificate								
1.9	Other Certifications							
	Others			Italian Scheme for Biofuels and Bioliquids certificate number IT/AFO-20180118 DM 23.01.2012				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	Mill	Time Bound Plan						
	Indonesia – Kalimantan Region							
	Mustika Sembuluh 1 POM	2010	Mustika Sembuluh 1	2010	Central Kalimantan	Certified		
			Mustika Sembuluh 2	2010	Central Kalimantan	Certified		
	Mustika Sembuluh POM 2 (PT Mustika Sembuluh)	2015	Mustika Sembuluh 3	2010	Central Kalimantan	Certified		
			KUD Bitu Maju Bersama	2014	Central Kalimantan	Certified		
	Kerry Sawit Indonesia 1 POM	2011	Kerry Sawit Indonesia 1	2011	Central Kalimantan	Certified		
			Kerry Sawit Indonesia 2	2011	Central Kalimantan	Certified		
	Kerry Sawit Indonesia 2 POM (PT Kerry Sawit Indonesia)	2015	Kerry Sawit Indonesia 3	2011	Central Kalimantan	Certified		
			KUD Karya Bersama	2023	Central Kalimantan	Re Audit, initial certification to process after land title process		
			KUD Sejahtera Bersama	2023	Central Kalimantan			
			KUD Tabiku Makmur	2023	Central Kalimantan			
			KUD Kosudra	2023	Central Kalimantan			
	Bumi Sawit Kencana POM (PT Bumi Sawit Kencana)	2013	Bumi Sawit Kencana 1	2013	Central Kalimantan	Certified		
			Bumi Sawit Kencana 2	2013	Central Kalimantan	Certified		

I	Kencana)					
	POM 1 and POM 2 (PT Sarana Titian Permata)	2023	Sarana Titian Permata 1	2023	Central Kalimantan	-
			Sarana Titian Permata 2	2023	Central Kalimantan	-
			Sarana Titian Permata 3	2023	Central Kalimantan	-
	Mentaya Sawit Mas POM (PT Mentaya Sawit Mas)	2015	Mentaya Sawit Mas 1	2015	Central Kalimantan	Certified
			Mentaya Sawit Mas 2	2015	Central Kalimantan	Certified
			KUD Karya Makmur Pahrangan	2023	Central Kalimantan	-
	Rimba Harapan Sakti POM (PT Rimba Harapan Sakti)	2015	Rimba Harapan Sakti 1	2015	Central Kalimantan	Certified
			Rimba Harapan Sakti 2	2015	Central Kalimantan	Certified
			KUD Makmur Sejahtera	2023	Central Kalimantan	-
	Karunia Kencana Permaisejati POM (PT Karunia Kencana Permaisejati)	2017	Karunia Kencana Permaisejati 1	2017	Central Kalimantan	Certified
			Karunia Kencana Permaisejati 2	2017	Central Kalimantan	Certified
			Karunia Kencana Permaisejati 3,	2017	Central Kalimantan	Certified
	Agro Nusa Investama POM (PT Agro Nusa Investama (Sambas))	2019	Agro Nusa Investama (Sambas) Estate	2019	West Kalimantan	Certified
			KUD Cempaka Biru	2019	West Kalimantan	Certified
			KUD Sentama Lestari	2019	West Kalimantan	Certified
			Sri Maram Estate	2023	West Kalimantan	-
			Sri Maram Cooperative	2023	West Kalimantan	-
			Pusaka Abadi Nan Jaya Cooperative	2023	West Kalimantan	-
			Anugrah Semaro Cooperative	2023	West Kalimantan	-
	Bumipratama Khatulistiwa POM (PT Bumi Pratama Khatulistiwa)	2016	Bumi Pratama Khatulistiwa Estate	2016	West Kalimantan	Certified
			PT Buluh Cawang Plantation	2023	West Kalimantan	-
			KUD Tuah Jubata	2023	West Kalimantan	-
	Agro Nusa Investama (Landak) POM (PT Agronusa Investama (Landak))	2023	Agro Nusa Investama (Landak) Estate	2023	West Kalimantan	-
			Pratama Procentindo Estate (PT Pratama Procentindo)	2023	West Kalimantan	-
	Agro Palindo Sakti POM (PT Agro Palindo Sakti 2)	2023	Agro Palindo Sakti Estate	2023	West Kalimantan	Land title issue
			Putra Indotropical Estate (PT Putra Indotropical Estate)	2023	West Kalimantan	Land title issue
			Daya Landak Plantation Estate (PT Daya Landak	2023	West Kalimantan	Land title issue

		Plantation)			
		Indoresin Putra Mandiri (PT Indoresin Putra Mandiri)	2023	West Kalimantan	Land title issue
Indonesia – Sumatera Region					
Pinang Awan POM (PT Perkebunan Milano)	2009	Sei Daun	2009	North Sumatra	Certified
		Batang Saponggol	2009	North Sumatra	Certified
		Marbau	2009	North Sumatra	Certified
Tania Selatan POM (PT Tania Selatan)	2010	Burnai Barat	2010	South Sumatra	Certified
		Burnai Timur	2010	South Sumatra	Certified
Kencana Sawit Indonesia POM (PT Kencana Sawit Indonesia)	2020	Kencana Sawit Indonesia	2020	West Sumatra	Certified
AMP Plantation POM (PT AMP Plantation)	2011	AMP I	2011	West Sumatra	Certified
		AMP II	2011	West Sumatra	Certified
		AMP III	2011	West Sumatra	Certified
		AMP IV	2011	West Sumatra	Certified
		Primatama Mulia Jaya	2011	West Sumatra	Certified
		Tompek Tapian Kandis cooperative	2014	West Sumatra	Certified
		Mutiara Sawit Jaya cooperative	2014	West Sumatra	Certified
		Bukit Sandiang Tigo cooperative	2014	West Sumatra	Certified
		Agro Wira Masang cooperative	2014	West Sumatra	Certified
Buluh Cawang Plantation POM (PT Buluh Cawang Plantation)	2012	Bumi Arjo	2012	South Sumatra	Certified
		Dabuk Rejo	2012	South Sumatra	Certified
		Sukamulya	2012	South Sumatra	Certified
		Bambu Kuning	2012	South Sumatra	Certified
Gersindo Minang Plantation POM (PT Gersindo Minang Plantation)	2012	Gersindo Minang Plantation	2012	West Sumatra	Certified
		Permata Hijau Plantation 1	2012	West Sumatra	Certified
		Permata Hijau Plantation 2	2012	West Sumatra	Certified
		PT Permata Hijau Pasaman (block 22)	2023	West Sumatra	-
Daya Labuhan Indah POM (PT Daya Labuhan Indah)	2013	Wonosari	2013	North Sumatra	Certified
		Sei Deras	2013	North Sumatra	Certified
		Cabang Dua (PT Milano)	2013	North Sumatra	Certified
Agro Palindo Sakti POM (PT Agro Palindo Sakti)	2014	Agro Palindo Sakti Estate	2014	South Sumatra	Certified (POM has been closed down)
Murini Samsam	2015	Murini Sam Sam Estate	2015	Riau	Certified

POM (PT Murini Sam Sam)		Part of PT Murini Samsam areas (466 ha)	2023	Riau	-
Musi Banyuasin POM (PT Musi Banyuasin Indah)	2023	Sei Selabu	2023	South Sumatera	-
		Sei Jarum	2023	South Sumatera	-
		Agro Palindo Sakti Estate	2023	South Sumatera	-
Sinarsiak Dianpermai POM (PT Sinarsiak Dianpermai)	2023	Sinarsiak Dianpermai Estate	2023	Riau	-
Agro Indah Persada 2 POM (PT. Agroindo Indah Persada)	2023	Agro Indah Persada	2023	Bangko – Jambi	NPP Audit
Malaysia					
Sapi POM (PPB Oil Palms Berhad)	2008	Sapi 1	2008	Sandakan, Sabah, Malaysia	Certified
		Sapi 2	2008	Sandakan, Sabah, Malaysia	Certified
		Kiabau	2008	Sandakan, Sabah, Malaysia	Certified
Reka Halus POM (PPB Oil Palms Berhad)	2008	Reka Halus	2008	Sandakan, Sabah, Malaysia	Certified
Sabahmas POM (PPB Oil Palms Berhad)	2008	Sabahmas	2008	Lahad Datu, Sabah, Malaysia	Certified
Saremas 1 POM (PPB Oil Palms Berhad)	2010	Saremas	2010	Bintulu, Serawak, Malaysia	Certified
		Saremas 2 (Div D)	2010	Bintulu, Serawak, Malaysia	Certified
		Suai	2010	Bintulu, Serawak, Malaysia	Certified
Saremas 2 POM (PPB Oil Palms Berhad)	2010	Saremas 2 (exclude Div D)	2010	Bintulu, Serawak, Malaysia	Certified
		Kaminsky	2010	Bintulu, Serawak, Malaysia	Certified
		Segarmas	2010	Bintulu, Serawak, Malaysia	Certified
Ribubonus (PPB Oil Palms Berhad)	2010	Ribubonus	2010	Sandakan, Sabah, Malaysia	Certified
Terusan POM (PPB Oil Palms Berhad)	2010	Terusan 1 + 2	2010	Sandakan, Sabah, Malaysia	Certified
		Rumidi	2010	Sandakan, Sabah, Malaysia	Certified
Sri Kamusan POM (PPB Oil Palms Berhad)	2011	Sri Kamusan	2011	Sandakan, Sabah, Malaysia	Certified
		Hibumas 1	2011	Sandakan, Sabah, Malaysia	Certified
		Hibumas 2	2011	Sandakan, Sabah, Malaysia	Certified

				Malaysia	
		Jebawang	2011	Sandakan, Sabah, Malaysia	Certified
		Sekar Imej	2011	Sandakan, Sabah, Malaysia	Certified
		Sapi Sugut	2011	Sandakan, Sabah, Malaysia	Certified
		Laba Utama (Div of Jebawang)	2023	Sandakan, Sabah, Malaysia	-
Suburmas POM (PPB Oil Palms Berhad)	2023	Suburmas	2023	Bintulu, Serawak, Malaysia	-
Africa					
BOPP POM, Biase Plantation Limited	2014	Adum Bansa	2014	Western Region, Ghana	Certified
		Scheme Smallholder	2014	Western Region, Ghana	Certified
-	-	Treboum Smallholders	2022	Western Region, Ghana	
Biase Plantation Limited	2020	Calaro	2022	Cross River State, Nigeria	Mill construction complete. Delay due to Covid
		Calaro extension	2022	Cross River State, Nigeria	To be certified, NPP completed
Biase Plantation Limited	2020	Ibiae	2023	Cross River State, Nigeria	To be certified, NPP completed
Eyop Industries	2021	Ibad	2025	Cross River State, Nigeria	To be certified
Eyop Industries	2020	Kwa Falls	2025	Cross River State, Nigeria	To be certified
Eyop Industries	2021	Oban	2025	Cross River State, Nigeria	To be certified
<p><i>Time bound plan Indonesia update Januari 2021, Malaysia update June 2021, Africa update May 2021</i></p> <p>The revision of time bound plan because there is the change of certification time plan from year 2020 to year 2023 for some uncertified management units with reason is still in process to get land use right (Hak Guna Usaha). Some uncertified management units which changed from year 2020 to year 2023 are PT Agro Nusa Investama (Landak) and its supply based (PT Agronusa Investama 2 and PT Pratama Procentindo), PT Buluh Cawang Plantation in West Kalimantan (one of supply base from PT Bumipratama Khatulistiwa), PT Permata Hijau Pasaman (block 22), PT Agro Palindo Sakti in Sanggau District, West Kalimantan and its supply based (PT Agro Palindo Sakti, PT Putra Indotropical, PT Daya Landak Plantation and PT Indoresin Putra Mandiri), PT Sinarsiak Dian Permai in Riau and PT Musi Banyuasin Indah in South Sumatera.</p> <p>The revision of time bound plan because some scheme smallholders has paid all costs relate of develop of scheme smallholder areas so that it has excluded from the time bound plan. It is KUD Damai Sejahtera (DASTRA) I & II (scheme smallholder under PT AMP Plantation and PT Primatama Mulia Jaya), KSU Mutiara Bosa Sikilang, KUD Permata Sawit Maligi, KUD Rantau Pasaman – Sasak and KUD Kapar (its supply based from PT Gersindo Minang Plantations POM)</p> <p>The revision of time bound plan because two companies (PT Karya Agung Megah Utama & PT Perkebunan Anak Negeri Pasaman) has terminated the management agreement with PT AMP Plantation as stated in the termination agreement letter on 31 May 2019.</p>					

	<p>The result of internal discussion referring RSPO P&C Certification System, 2017 and communicating with auditee that Auditor has not accepted the revision of time bound plan for some cooperatives (KUD Karya Bersama, KUD Sejahtera Bersama, KUD Tabiku Makmur & KUD Kosudra) as supply base from PT Kerry Sawit Indonesia be year 2023 because it is not compliance with RSPO Certification System clause 4.1.3 so auditor has issued final decision as seen on table 8 above.</p> <p><u>The latest update</u></p> <p>The revision of time bound plan because there is the change of certification time plan to 2022, 2023, and 2025 for some uncertified management units with reason is still in process to get land use right (Hak Guna Usaha) for some unit in Indonesia, pending NPP assessment for some unit in Africa, and delayed certification due to Covid 19 for some unit in Africa and Malaysia.</p> <p>Regarding the TBP more than 2023, Wilmar has communicated about the TBP to RSPO on 16 July 2021. RSPO response about the TBP is RSPO approved the latest TBP with some notes to take into consideration by Wilmar.</p>
1.10.2	<p>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</p> <p>The company currently has associated smallholders since 2017, based on the following agreements:</p> <ul style="list-style-type: none"> - Agreement of 377.24 Ha dated 7 November 2017 with Makmur Sejahtera cooperation sub district of Seruyan Hilir, district of Seruyan - Agreement of 224 Ha dated 7 November 2017 with Makmur Sejahtera cooperation sub district of Seruyan Hilir, district of Seruyan <p>The members of smallholders are 355 members according to decree of Seruyan district head No. 188.45/428/2015. The area of 377.24 currently are hand over areas from PT. Kerry Sawit Indonesia (subsidiary of Wilmar), which the FFB have been sent to RHS POM since July 2018 in the name of Makmur Sejahtera cooperation.</p> <p>The legally process of smallholder's areas, currently in location permit process:</p> <ul style="list-style-type: none"> - Approval of principle and location map from Head of Seruyan District No. 500/340/EK/II/2018 dated 13 February 2018 for ± 377 Ha. - Approval of principle and location map from Head of Seruyan District No. 500/1787/EK/XI/2016 dated 30 November 2016 for ± 224.06 Ha - Letter of application for technical consideration from Makmur Sekahtera cooperation No. 02/KSU-MS/PL/I/2017 dated 20 January 2017 to land agency of Seruyan district. - Letter of application for location permit from Makmur Sekahtera cooperation No. 02/KSU-MS/PL/I/2017 dated 20 January 2017 to Head of Seruyan District. <p>Plasma area are directly managed by PT RHS and plan to be certified on timebound plan at 2023.</p>

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA 1.2	<p>1. Haikal Ramadhan Kharismansyah (Lead Auditor). Indonesian citizen, Bachelor of Agriculture department of plant and pest disease (Agrotechnology). He has 3 years' experience as an Agronomy Staff in private oil palm plantation in Indonesia. Training which had attended including Basic Management Development Program Agronomy, Integrated Urban Pest Management, Integrated Pest Management, ISO 9001:2015, Auditor ISPO, RSPO Lead Auditor Training, ISO 22000 awareness, RSPO SCCS, and Social Auditing by WIRE. Did some audit SPO scheme with aspects best management practices, SCCS, Legal, Social, and worker welfare. During this assessment verified Legal, FPIC, SCCS, Social, Time Bound Plan & Partial Certification.</p> <p>2. Afiffuddin (Auditor). Indonesian citizen, Diploma III majoring Palm Oil Plantation, Bogor Agricultural University. Five years working experience since 2010 at Oil Palm Plantation Company in Indonesia as agronomy operational staff and followed several trainings namely: Basic Plantation Management Program, Auditor Training Indonesian Sustainable Palm Oil (ISPO), Training of RSPO lead auditor, OHS General Expert, OHS System Management based on PP 50 2012 and Management System Certification (ISO 9001-2015/SNI 19011-9001:2015) ISO 17021, ISO 17065, SA 8000 training. He has been involved in several audit activities related to sustainable palm oil certification since 2016 covering Best Management Practices aspect, health and safety aspect and worker welfare aspect. During this audit, He conducted an assessment on OHS and Best Management Practices</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 Training, RSPO Lead Training, 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. Kiki Fadli (Auditor Trainee). Bachelor of Agricultural Engineering, Agricultural Engineering Study Program. Has experience working in the sustainability department in private and state-owned oil palm plantations. Has attended training on Lead Auditor ISPO, Lead Auditor RSPO, General OHS Expert, ISO 9001:2008, ISO 14001:2015, ISO 17021, ISO 17065, HCV, SMK3. During this assessment, he verified the worker welfare and transparency under supervision of 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 1.2	<p>Number of auditors: 3 auditors and 1 auditor trainee</p> <p>Number of days for ASA 1.2 onsite audit: 5 days</p> <p>Number of working days for ASA 1.2 onsite audit: 15 Working days</p>
2.2.2	Assessment Process
ASA 1.2	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the RHS POM – PT Rimba Harapan Sakti to the requirements of Indonesia National Interpretation RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSPO Board of Governors on 20th April 2020 and RSPO Certifications Systems for Principles & Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 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) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Some opportunities for improvement of the results ASA-1.2 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-1.3)</p> <p>Improvement of findings from ASA-1.1 assessment findings were observed by auditors at this ASA-1.2. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA 1.2</p>

The opening meeting is conducted online while the closing meeting is held offline. Both activities were attended by auditee representatives such as the General Estate Manager, Estate Manager, operational staff, support team and sustainability team as well as representatives from HO Jakarta. When the auditor team submitted audit conclusions, there were no objections raised by the auditee to the audit conclusions

The assessment program please find Appendix 2.

2.2.3
Locations of Assessment
ASA 1.2
Rimba Harapan Sakti POM

- **Security.** Observations and interviews regarding the supply chain flow of employment aspects and OHS aspects
- **Weighbridge.** Observations and interviews regarding processed FFB sources and supply chain systems
- **CPO Storage Tank.** Observation of CPO storage capacity
- **Palm Kernel Storage.** Observation of Palm Kernel storage capacity
- **Chemical Storage.** Observation about storage condition, MSDS, OHS implementation, emergency facility, and material stock.
- **Lubricant Storage.** Observation about storage condition, MSDS, OHS implementation, emergency facility, and material stock
- **Workshop.** Observation and interview to store keeper related to OHS, waste management and worker welfare aspect.
- **Hazardous waste temporary storage.** Observation about storage condition, hazardous waste stock, emergency response facility, and waste management.
- **Water Treatment Plant.** Observations and interviews related work procedure, safety aspect, worker welfare, environment aspect etc.
- **Empty Bunch, Shell, and Fiber Storage.** Observation about storage condition.
- **Diesel Tank Station.** Observation about emergency facility and OHS implementation.
- **Central storage.** Observation about storage condition, PPE stock, emergency response and OHS implementation.
- **Grading Station.** Observations the activity of grading FFB and also PPE used by worker.
- **Boiler Station.** Field observations and interviews related to work procedure, OHS, and Labour aspect.
- **Sterilizer Station.** Field observations and interviews related to work procedure, OHS, and Labour aspect.
- **Clarification Station.** Field observations and interviews related to work procedure, OHS, and Labour aspect.
- **Press Station.** Field observations and interviews related to work procedure, OHS, and Labour aspect.
- **Engine room.** Field observations and interviews related to work procedure, OHS, and Labour aspect.
- **Hydrant simulation at Boiler Station.** Simulation about ydrant condition simulation and hydrant function.
- **Waste Water Treatment Plant (WWTP) or Effluent Plant.** Field observation related POME management, recording, OHS and environmental.
- **Water Intake.** Field observation related water surface intake management, recording, OHS and environmental.
- **Housing RHS POM.** Field Observations about domestic waste management, hazardous waste management, emergency facilities, and facilities provided for workers.

Rimba Harapan Sakti-1 Estate

- **Boundary pole number RHS 096. Block 219.** Observation regarding maintenance and marking of company boundary markers
- **Boundary pole number RHS 088. Block 041.** Observations regarding the maintenance and marking of company boundary markers
- **Boundary pole number RHS 085. Block 052.** Observations regarding the maintenance and marking of company boundary markers
- **Emplacement. Division 1a and 1b. Block C75.** Observation and interview regarding employee facilities
- **Division 1a and 1b generators.** Observations and interviews regarding housing power sources, operator working hours, and aspects of K3 and environmental management.

- HCV block 218. Observations on HCV management and protection
- HCV block 048. Observations on HCV management and protection
- Fire Watchtower. Block 250. Observation of hotspot monitoring facilities.
- Landfill. Block 046. Observations on residential domestic waste management
- Rinse House. Observation of sanitation facilities for pesticide and fertilizer applicators
- Harvesting, Block 048 Division IA and Block 028 Division 1B. Field observations and interviews related to aspects of BMP, K3, and Labour.
- Lose Fruit, Block 049 Division IA and Block 022 Division 1B. Field observations and interviews related to aspects of BMP, K3, and Labour.
- Fertilizer, Block 035 Division 1A. Field observations and interviews related to aspects of BMP, OHS, Environment and labour.
- Raking, Division 1A. Field observations and interviews related to aspects of BMP, OHS, Environment and labour.
- Hazardous Waste Temporary Warehouse. Observation the warehouse condition.
- Fertilizer warehouse. Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- Agrochemicals Warehouse. Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- Spare part and PPE warehouse. Observation minimum stock of PPE's.
- Engine room. Field observations and interviews related to work procedure, OHS, and Labour aspect.
- Workshop. Observations and interviews with officers related to material handling, work procedures, OHS, wages and environmental management.
- Clinic. Observations and interviews of health, environmental, training, and employment facilities.

Rimba Harapan Sakti-2 Estate

- HCV Block 144 (restoration area). Observations on HCV management and protection
- HCV Block 137. Observations on HCV management and protection
- HCV Block 118. Observations on HCV management and protection
- Not plantable area block 160. Observation of non-plantable area
- Boundary pole RHS 36 block 145. Observation of company boundaries
- Boundary Pole RHS 37 block 145. Observation of company boundaries
- Boundary Pole RHS 25 block 118. Observation of company boundaries
- Fire Watchtower block 121. Observation of hotspot monitoring facilities
- Landfill Block 109. Observations on domestic waste management
- Clinic. Observation and interview to paramedic related to worker's health services and infectious waste management.
- Chemical Storage. Observation and interview to store keeper related to agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- Fertilizer Storage. Observation and interview to store keeper related to OHS, waste management and worker welfare aspect.
- Central Storage. Observation and interview to store keeper related to OHS, waste management and worker welfare aspect.
- Oil Storage, Observation and interview to store keeper related to OHS, waste management and worker welfare aspect.
- Workshop. Observation and interview to store keeper related to OHS, waste management and worker welfare aspect.
- Diesel Tank Station. Observation and interview to store keeper related to OHS, waste management and worker welfare aspect.
- Hazardous Waste Storage (Solid and Liquid). Observations and interview related the condition of storage and hazardous waste management.
- Agrochemicals Storage. Observation and interview related to management of agrochemical material and

	<p>waste, MSDS, emergency response facilities and the types of pesticides used.</p> <ul style="list-style-type: none"> • Fire Extinguisher warehouse. Observations related to condition of storage, fire extinguisher equipment, and land fire management. • Harvesting, Block 169 Division 2A and Block 144 Division 2B. Field observations and interviews related to aspects of BMP, K3, and Labour. • Fertilizer, Block 168 Division 2B. Field observations and interviews related to aspects of BMP, OHS, Environment and labour. • Spraying, Block 123 Division 1A. Field observations and interviews related to aspects of BMP, OHS, Environment and labour. • Application Solid, Block 142 Division 2A. Field observations and interviews related to aspects of BMP, OHS, Environment and labour. • Barn Owl Box. Observation of BOB condition and Owl activity level. • Water Level, Piezometer And Subsidence Stake, Block 158 Division 2. Field observations and interviews on peat management • Emplacement E54 Facilities. Field Observations to emplacement facilities such as assembling points, fire extinguisher, , in-organic waste store, sanitation system, housing quality, playground, and mosque. • Rinse House Manuring E54. Field Observations towards rinsing process regarding OHS and environmental aspect. • Storage area for harvest work tools. Field Observations to Storage area for harvest work tools • Daycare E54. Observation and interview with worker related labor aspect and OHS • Emplacement K72 Facilities. Field Observations to emplacement facilities such as assembling points, fire extinguisher, , in-organic waste store, sanitation system, housing quality, playground, and mosque. • Rinse House Spraying K72. Field Observations towards rinsing process regarding OHS and environmental aspect. • Daycare K72. Observation and interview with worker related labor aspect and OHS • Generator set haouse K72. Observation and interview with worker related labor aspect and OHS
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA 1.1	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Rimba Harapan Sakti was held by:</p> <ul style="list-style-type: none"> • Public Notification on website PT Mutuagung Lestari on August 22, 2022 • Public consultation with NGOs (by email) such as WALHI, AMAN, and Sawit Watch on 29 Agustus 2022 • Public consultation meeting with government institution 06 – 09 September 2022 • Public consultation meeting with communities on 06 – 09 September 2022 • Public consultation meeting with internal stakeholders and contractor 06 – 09 September 2022 <p>Numbers of input from stakeholders were clarified by PT Rimba Harapan Sakti</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (ASA-1.3) will be conducted eight (8) months until twelve (12) months after date of annual license.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Rimba Harapan Sakti POM – PT Rimba Harapan Sakti, Subsidiary of Wilmar Group operation consisting of one (1) mill and two (2) oil palm estates.

During the assessment, there were one (1) Nonconformities Major and one (1) opportunity for improvement were identified. Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5.

MUTUAGUNG LESTARI found that Rimba Harapan Sakti POM – PT Rimba Harapan Sakti, Subsidiary of Wilmar Group complied with the requirements of Indonesia National Interpretation RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSPO Board of Governors on 20th April 2020 and RSPO Certifications Systems for Principles & Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020)

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1		
The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1		
The company has a SOP for Providing Information to Outside Parties (Transparency) with No. SOP 47/PR/(7)/0921 revision 7 dated 21 September 2021. The procedure explains whether information can be accessed or not, including:		
Accessible documents, such as:		
<ul style="list-style-type: none"> • Land use certificates/rights • OHS Plan • Social and environmental impact planning and assessment • HCV documentation • Pollution reduction and prevention plans • Complaints in detail • Negotiation procedure • Continuous improvement plan • Etc 		
Documents that can be accessed with the approval of the General Manager, such as:		
<ul style="list-style-type: none"> • Deed of establishment and deed of change of company • Company profit/loss • Salary staff • Identity of shareholders and company management • Identity of operational leaders, staff and employees • List of company assets • List of land/plantation business land • Community development plan • Land acquisition payment data • Etc 		

Stakeholders can access these documents by submitting requests for information to the company's PIC or some documents can also be viewed through the company's website such as company policies, corporate profiles, etc.

1.1.2

Company 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. Company has shown examples of receipt of mandatory report to government agency which has been summarized in the following table:

- Investment Activity Report for the second quarter of 2022 with report number LK1544839 dated 11 July 2022
- Mandatory Employment Report No. Reporting : 74213.20220506.0002 dated 06 May 2022 with obligation to report back 06 May 2023
- HGU Utilization Report dated March 8, 2022 to the National Land Agency of Seruyan Regency and received on March 17, 2022
- Plantation Business Development Report dated April 8, 2022 to the Seruyan Regency Food and Agriculture Security Service
- Hazardous and Toxic Waste Management Report of First and Second Quarter 2022 has been reported to Environmental Agency of Seruyan Regency and Environmental Agency of Kalimantan Tengah Province on 20 April 2022 and 5 August 2022 respectively.
- Report on Implementation of Management and Monitoring Plan (*RKL-RPL*) of Second Semester 2021 has been reported to Environmental Agency of Seruyan Regency on 20 April 2022. Electronic receipt of this report to Environmental Agency of Center Kalimantan Province and Ministry of Environment and Forestry through SIMPEL (*Sistem Informasi Pelaporan Elektronik Lingkungan Hidup*) with ID 1650681464-2400.
- Report on Implementation of Management and Monitoring Plan (*RKL-RPL*) of First Semester 2022 has been reported through SIMPEL (*Sistem Informasi Pelaporan Elektronik Lingkungan Hidup*) to Environmental Agency of Seruyan Regency, Environmental Agency of Center Kalimantan Province and Ministry of Environment and Forestry with electronic receipt ID 1650681467-2400.
- The receipt of the report on the activities of the Bipartite cooperation institution for the first semester of 2022 was submitted to the Seruyan Regency Manpower Office on August 4, 2022.
- Mandatory Reporting for Manpower (Estate) with reporting No 74213.20220506,002 reporting date 6 May 2022.
- Mandatory Reporting Manpower (Mill) with reporting No 74213.202204250001 reporting date 25 April 2022.
- First Quarter 2022 Guiding Committee of Occupational Safety & Health Report (Estate) to the Manpower and Transmigration Office of Kalimantan Tengah Province, April 20, 2022
- First Quarter 2022 Guiding Committee of Occupational Safety & Health Report (Estate) to the Manpower and Transmigration Office of Seruyan District, April 20, 2022.
- Report of Guiding Committee of Occupational Safety & Health Quarter II 2022 (Estate) to the Manpower and Transmigration Office of Seruyan District, dated August 8, 2022.
- Report of Guiding Committee of Occupational Safety & Health Quarter II 2022 (POM) to the Office of Manpower and Transmigration of Kalimantan Tengah Province, dated August 5, 2022
- Report of Guiding Committee of Occupational Safety & Health Quarter II 2022 (Estate) to the Office of Manpower and Transmigration of Kalimantan Tengah Province, August 5, 2022

Based on the results of interviews with community representatives and government stakeholders, it is known that stakeholders already know the mechanisms of communication and consultation with companies and the types of information that can be accessed.

1.1.3

The company already has a SOP for Providing Information to Outside Parties (Transparency) with No. SOP 47/PR/(7)/0921 revision 7 dated 21 September 2021. The procedure explains that the company will respond to requests for information no later than 14 days after the request is received. Acceptance of requests for information and responses is accounted for by the Partner Development department.

Based on the results of verification of incoming and outgoing documents, it is known that all incoming letters including requests for information have been responded to by the company, for example a letter from the Bintang Sejahtera Farmer Group No. 01/SK/KTBS/XII/2021 dated December 21, 2021 regarding the application for a pass permit, which the company has responded to on January 4 with letter number 02/SSL-RHS/I/2022.

1.1.4

The company demonstrated the procedure for the Implementation of Community Communication and Consultation Mechanism No.

SOP 35/PR/(3)/0921 revision 3 dated 21 September 2021 which explains that admin and public relations are responsible as company officials appointed to communicate and consult with the community.

The company also showed the minutes of the company's socialization to stakeholders and community representatives which was held on 24 May 2022 in Pemantang Limau Village which was attended by 58 participants. Based on the results of interviews with community representatives and government stakeholders, it is known that stakeholders already know the communication and consultation mechanism with the company.

1.1.5

The company has a list of stakeholders which was updated on July 1, 2022, which provides the name of the agency, contact name, field of cooperation, address and contact number. The list of stakeholders consists of:

- Central Kalimantan Provincial Government
- Seruyan District Government
- Subdistrict head
- Village head
- Public figure
- NGOs
- Contractor
- Suppliers
- Transporter of hazardous and toxic waste

From the contact list, the auditor conducts public consultations with several stakeholders such as Seruyan District Government, Suppliers, etc.

Status: Comply

1.2

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

1.2.1

A Code of Ethics Policy is available, which was reviewed last June 1, 2019. These policies include, among others, stating three main principles, namely avoiding conflicts of interest, avoiding abuse of position/authority and to ensure the confidentiality of information and prevent misuse of information obtained through the company's operational activities for personal or other purposes other than corporate interests.

The implementation of these policies is stated in the cooperation contract with the contractor. For example, those listed in the Letter Of Commitment from the contractor CV. Ain Ito (CPO transport contractor), dated September 1, 2022 and signed by the Director, who among others stated that CV Ain Ito would carry out the work in accordance with procedures and comply with the Code of Ethics applicable in the company.

1.2.2

The monitoring system for compliance with the ethics policy is carried out through monitoring complaints. The company has a complaint procedure, which is listed in the complaint procedure or complaints as outlined in document No. SOP 42/HRD/(1)/1117 for submitting complaints including complaints of violations of the code of ethics. In addition, the company also routinely evaluates contractor performance which includes aspects of the RSPO including ethical behavior. Based on the results of the review of the contractor's performance evaluation document, it was found that there was no indication of a violation of ethical behavior.

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

Legal Aspect

- Unit of Certification has showed plantation business permit issued by Seruyan Regent through decree No. 525/109/EK/2009 on 2 May 2009 covering area for about ±13,800 Ha.

- Company showed HGU (*Hak Guna Usaha*) based on decree of Head of Indonesia National Land Agency No. 26/HGU/BNP RI/2011 dated 13 June 2011 for an area of 13,789.745 ha. This area was from forest area that has been released based on Decree of Forestry Minister No: SK.100/Menhut-II/2005, on 21 April 2005 for an area of 16,702.26 Ha.
- Minutes of Implementation of the 2021 Plantation Business Assessment dated December 16, 2021, signed by the assessment team of Kalimantan Tengah Province. Until this assessment the results of the plantation class assessment have not been published

Environmental Aspect

- Environmental study in the form of AMDAL Document for PT. Rimba Harapan Sakti compiled in 2009 which was approved by Governor of Central Kalimantan through Decree No. 18844/285/2009 concerning Environmental Feasibility of Plantation Development Activities and Palm Oil Processing Factory PT. Rimba Harapan Sakti covers an area of 13,800 hectares and a factory capacity of 45-ton FFB/hour in Sembuluh I and Sembuluh II Villages, Danau Sembuluh District, Seruyan Regency, Central Kalimantan Province.
- Permit to utilize wastewater from palm oil industry of PT RHS on land (Land Application) in accordance with decision of Regent of Seruyan Number 188.45/512/2015 dated December 16, 2015, but the permit has passed the validity period (5 years) on December 15, 2020. Company has made efforts to extend the permit and the field verification stage has been carried out on March 11, 2021. Company has shown Letter Number 660/330/DLH.II/VI/2021 issued by the Environment Service of Seruyan Regency on 2 June 2021 stated that the issuance of permits for Land Applications should be in accordance with Government Regulation No. 22 of 2021. In surveillance 1.2, company has shown effort to follow up this extension permit. Based on Minute of Field Survey on 17 February 2022 from consultant (PT Amas Interconsultant), it has been done field survey and initial hue environmental sampling for Wastewater Utilization Technical Approval Study (Land Application) of PT RHS. Based on result of interview with company, extension of land application permit is still in process by consultant with last communication for this extension with consultant is on 5 April 2022 regarding to result of environmental testing.
- Decree of the Head of the Seruyan Regency One Stop Service Investment Office No 503/977/DPMPTSP/XII/2019 for hazardous waste storage located in the Estate and POM, dated 17 December 2019 valid for 5 years, while Hazardous Waste Storage is licensed located in 3-unit RHS Estate 1, 2-unit RHS Estate 2 and 1-unit RHS POM.
- Surface water extraction permit based on Decree of Head of Central Kalimantan Province Investment and One Stop Service Office Number: 570/03/DPUPR-IPAP/II/DPMPTSP-2018 concerning Granting of Surface Water Concession Permit on Pukun River in Pematang Limau Village, District Seruyan Hilir, Seruyan Regency, Central Kalimantan Province by PT Rimba Harapan Sakti January 8, 2018 and is valid for 3 years. The permit has expired on January 8, 2021. Company has shown extension of this permit in accordance with recent regulation based on Letter No. 05/RMKT/DPUPR-SDA/VIII/2022 on 23 August 2022 regarding to Technical Recommendation of Surface Water Utilization Permit in Pukun River.

Employment

The company sets a minimum wage of IDR 3,317,675 or a daily wage of IDR 132,707 which is in accordance with the Decree of the Governor of Central Kalimantan Number 188.44/445/2021 dated November 30, 2021 regarding the minimum wage for Seruyan Regency in 2022.

Best Management Practices and OHS aspect

Compliance with regulations according to Best Management Practices and OHS indicators:

Best Management Practice aspect

In best management practices, it is known that plantation and mill management have implemented several laws and regulations in Indonesia, for example using mechanical or non-burning methods during land clearing, oil palm planted comes from seed producers recognized by the Indonesian government, such as Lonsum, Tania Selatan and Socfindo. Furthermore, plantations (each management unit) have implemented integrated pest control, biological control and only use pesticides that have a distribution permit from the ministry of agriculture.

OHS

- The establishment of the P2K3 (OHS Committee) for PT RHS which has been explained in indicator 6.7.1
- Provision of PPE for free to all workers and arrange the use of PPE according to the type of work based on the free predetermined HIRAC which has been explained in indicator 6.7.3
- Have permits for all factory operating machines and estate operators such as:
 - RHS1. Has 32 Heavy equipment operators that have licenses and are still valid, consisting of dump truck operators, tractor

operators, excavator operators, grader operators and Backhoe Loader operators. For example SAN (initial) as tractor operator with certificate number 99417-OPK3-LT/PAA/XI/2017, valid until 6 November 2022.

- RHS2. Has 26 operators consisting of Heavy equipment and power and production operators, class 1 diesel motors, which have a license and are still valid, consisting of dump truck operators, tractor operators and class 1 diesel motor operators. For example for PAW (initial) as class 1 diesel motor operator with certificate number 5743/PM/PTM/II/2019, valid until 19 February 2024.
- Has a license / competency for some special jobs that require more expertise such as OHS experts, hyperkes, boiler operators, diesel engine operators, welder, wheel loader operators and others in accordance with the requirements contained in the legislation.

2.1.2

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

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

Evaluation of law registers for contractors is explained in more detail in 2.2.2. In addition, an internal RSPO audit has also been carried out to ensure contractor compliance with regulations on 13 - 16 June 2022. The company also shows the Minutes of Management Review for the period 2020 – 2021 dated March 26, 2022. Aspects discussed include company policies, operational conditions in 2021, internal audit results, and compliance with laws and regulations. The latest law register update on June 2022 at the same time with internal audit RSPO.

2.1.3

The company shows the procedure for Installation and Monitoring of Boundary Pole Document No: 001/SOP/GIS/2018 dated 01 May 2018. The procedure states that the period of maintenance and monitoring of HGU pole is 6 months from the time the boundary pole are installed. If there are missing/damaged, repairs will be carried out no later than 3 months after there is a report from the monitoring activities of the boundary pole in the field

There is a monitoring result that was last carried out in July 2022. Based on the report, it is known that there are 81 HGU pole on RHS-1 and 57 HGU pole on RHS-2. In addition, it was also stated that there was 1 HGU pole in a damaged condition, namely the RHS No. 48 block 188/Q71. From the results of field visits to the RHS 096, RHS 088, RHS 085, RHS 36, RHS 37, and RHS 25 boundary pole, it is known that the condition of the stakes is in good condition according to the latest monitoring results.

Status: Comply

2.2

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

2.2.1-2.2.3

The company has a list of contractors who are included in the list of stakeholders made on July 1, 2022. The list of stakeholders includes the name of the agency, contact name, field of cooperation, address and contact number, for example for estate consisting of CV Randu Mas, CV Sinar Berokah, PT Sabindo and CV Alfa Rizqi Jaya, while the mill consists of PT Marga Dinamik Perkasa, CV Tri Mitra Sejahtera, CV Ain Aito and CV Marsha Elok Sejahtera and each unit keeps a list of its contractors.

The company also shows one of the agreements with contractors that contains clauses on legal compliance obligations, for example, work agreement letter no. C&A1608.15/2022/RHS1-640 dated May 4, 2022. In these agreements it has been explained about:

- Obligation to use PPE
- Ensure no child labour, forced or trafficking and human protection
- Third parties follow PNC RSPO, ISCC, ISPO. Therefore, in carrying out their work, the contractor is required to comply with the provisions made by the company related to PNC RSPO, ISPO and ISCC.

The company shows a Law Register document containing information on the List of Regulations and Regulations related to the activities of FFB contractors/suppliers, for example as follows:

- Cooperative Makmur Sejahtera (FFB supplier) with Document Form No. 02/SOP08/CKP/(5)/0921 dated August 1, 2022 which states that the Makmur Sejahtera Cooperative has complied with regulations such as Law No. 1 of 1970, Law No. 13 of 2003, Law No. 11 of 2020 and others.
- PT Sabindo with Document Form No. 02/SOP08/CKP/(5)/0921 dated August 1, 2022 which states that PT Sabindo has complied with regulations such as Law No. 1 of 1970, Law No. 13 of 2003, Law No. 11 of 2020 and others.

The company has demonstrated documentation of legal compliance by the contractor, such as:

- Data on wages for PT Sabindo workers in July 2022 are already above the district minimum wage, for example the initial S with a wage of Rp 5,300,000.
- Agreements between contractor workers and contractors, for example agreement no. 71/PTBBD/MDT/VII/2022 dated July 1, 2021 as well as other accessories, namely an ID card.
- Proof of payment of Social Security and Healthcare for the period of August 2022 which has been paid on August 10, 2022.
- Minutes of handover of PPE on August 9, 2022 to 20 workers with types of PPE, namely shoes, helmets, glasses, etc.

Status: Comply

2.3

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

2.3.1

RHS POM received FFB directly from the own estate, from scheme smallholder and other company under Wilmar Group. Company showed the list of FFB supplier in document "List of FFB Supplier Non RSPO PT RHS – POM 2022". The document informed about name of supplier, PIC, address, phone number, coordinate location, and proof of land owner. There are 6 direct FFB supplier to RHS POM. In the period September 2021 - August 2022, it is also known that there will be processed FFB from STP POM2 in November 2021 and January 2022 because STP POM2 is in maintenance.

2.3.2

RHS POM doesn't receive FFB from indirect supplier

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

There is a timed management plan, which is documented in the PT RHS Financials Projections from 2022 – 2027 document, which explains several parameters, including total planted area, FFB Production, yield per hectare, OER, KER, total FFB processed, CPO Production, PK Production and others. For example, in 2023, FFB production is projected to be 182000 mt, OER 22.5% and KER 5%.

The company also shows the PT RHS Estate Plasma Area document, which explains the projection of several parameters for the period 2022 – 2027, including the total planted area and FFB Production. For example, in 2023, FFB production is projected to be 8900 mt.

3.1.2

Based on the results of the review of PT RHS Financials Projections from 2022 – 2027 documents, area statement updated September 2022 and interviews with management regarding the replanting program, it is known that there is no replanting plan until 2027.

3.1.3

The unit of certification conducts a management review within the planned time in accordance with the scale and nature of the activities carried out, as indicated in the Minutes of Management Review of PT RHS Estate and POM for the period 2020 – 2021, which will be held on March 26, 2022.

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

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, which are shown as follows:

Social and Environmental Aspect

Company has developed and implemented action plan for continuous improvement and it is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. such as:

- Company no longer uses pesticides with active ingredient paraquat.
- 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 community.
- Use of renewable fuels accordance to reduce the use of fossil fuels.
- HCV Management Plan 2022 improved in terms of both the quantity and the quality of monitoring.
- Waste management and monitoring through WWTP pond management, testing the quality of the effluent and reporting it to the Environmental Agency of Seruyan Regency.
- Air quality management and monitoring through road maintenance, air quality testing and reporting to the Environmental Agency of Seruyan Regency.
- Management and monitoring of groundwater through testing ground water quality and reporting it to the Environmental Agency of Seruyan Regency.
- Hazardous waste management through Hazardous Waste Storage in permitted, management and monitoring of Hazardous waste also reported to the Environmental Agency of Seruyan Regency.
- Greenhouse Gas (GHG) Management. Implement a zero-burning policy, utilization of EFB, shells and fiber as renewable energy, regular engine maintenance, and regular emission quality tests.

BMP and Sustainability Aspects

- RSPO internal audit conducted on 13 – 16 June 2022 and documented in the PT RHS (Estate & POM) RSPO Internal Audit Report (P & C 2018) document.
- Audit Observation of PT RHS Estate 1 & 2, audit date 18 July – 02 August 2022 conducted by the System Development Control Department. The audit focuses on harvesting, maintenance, payroll, PGA, stores, VRA, petty cash and assets.

3.2.2

The company has shown the auditor regarding the RSPO metric template Version 2.1 for the period of 2021 that has been filled in according to the facts and data in the company's record documents. Based on the team auditor's review, the information has been matched with other documents, such as supply chain records, demographic workers, production area, water usage, FFB productions, work accidents, peat area, pesticide using and etc

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

There is a Standard Operating Procedure (SOP) for the unit of certification, which are shown in the SOP Master List document (July – September 2022). The procedures that the company has set include procedures on agronomic aspects, palm oil mill aspects, EHS aspects, HCV aspects, HRD aspects, R & D aspects, GIS aspects, sustainability aspects and others.

The procedure includes many processes, including those related to plantation best management practices which include the procedure for a pre-development survey, assessment and planting, nurseries, land clearing and preparation, legume cover crop, oil palm planting, upkeep and maintenance of oil palm, harvesting of Fresh Fruit Bunches, plant protection, pests and disease management, oil palm to oil palm replanting, EFB mulching and others. For mill best management practices include weighbridge, loading ramp, sterilization station, threshing station, pressing station, clarification station, kernel recovery station and boiler house and others.

Based on field observations and interviews with workers in estates and mills, it is known that workers have received socialization and training regarding their respective work procedures, for example based on the results of interviews with harvest workers in Block 048

Division IA and Block 028 Division 1B RHS-1 Estate and spraying in Block 123 Division 1A RHS-2 Estate, it is known that workers can explain and practice harvesting and spraying procedures.

3.3.2

The company has a mechanism to check the consistency of the implementation of procedures by conducting internal audits, both operational internal audits and internal sustainability audits. The company conducts regular internal audits in implementing SOPs for estates and mills including checking harvests, pest detection, rat census, etc.

The internal audit mechanism is contained in document no. SOP 63/SUS/(7)/0921, Rev. 7, September 2021 regarding Internal Audit, Improvement & Continuous Corrective Action.

Mechanisms to ensure compliance with RSPO standards for contractor workers are overseen by operational departments such as foremen, foreman I, assistants, security personnel, managers, and so on. Then, the safety officer also supervises the implementation of OHS contractors, such as the use of PPE and ownership of heavy equipment and other permits by contractors. Then the sustainability team also oversees the ongoing work agreement. For example, the addition of insurance provisions and OHS aspects. Procedures that apply to any non-conformities that arise, are required to take corrective action plans and preventive actions and submit them to the internal audit department.

3.3.3

The company shows recordings of the results of measurements and monitoring carried out internally as well as recordings of corrective actions taken, for example the Audit Observation PT RHS Estate 1 & 2, audit date 18 July – 02 August 2022 conducted by the System Development Control Department. The audit focuses on harvesting, maintenance, payroll, PGA, stores, VRA, petty cash and assets.

Status: Comply

3.4

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

3.4.1

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

Environmental Impact Assessment (EIA)

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

- AMDAL document for PT. Rimba Harapan Sakti compiled in 2009 which was ratified by the Governor of Central Kalimantan through Decree No. 188.44/285/2009 concerning Environmental Feasibility of Plantation Development Activities and Palm Oil Processing Factory PT. Rimba Harapan Sakti covers an area of 13,800 hectares, with a factory capacity of 45 tons of FFB/hour in Sembuluh I and Sembuluh II Villages, Danau Sembuluh District, Seruyan Regency, Central Kalimantan Province.
- The Environmental Management Plan (RKL) document covers the management of: Micro climate, gas and dust, noise, physical and chemical properties of soil, river water quality, groundwater quality, river water discharge, water biota, community attitudes and perceptions.
- Environmental Monitoring Plan (RPL) document includes monitoring of: microclimate, gas and dust, noise, physical and chemical properties of soil, river water quality, groundwater quality, river water discharge, water biota, community attitudes and perceptions, community unrest, and public health quality.

Social Impact Assessment (SIA)

Certification unit already conducted a Social Impact Assessment (SIA) for Palm Oil Plantations and Mills within the scope of Unit Certification of PT Rimba Harapan Sakti, Estate (RHS1 & RHS 2) and POM, Seruyan Hilir District, Seruyan Regency, Central Kalimantan. The assessment process was carried out on 19 – 26 January 2014 by the AFI ERFOLG Team – Bogor. Social impact assessment is included as part of Complementary to all environmental impact assessments. The assessment involved all parties affected by both internal and external stakeholders, including employees, workers union, village heads around the plantations and local NGOs. Participatory evidence with affected parties is shown in the form of attendance at FGD meetings and photos during interviews.

The report contains a description of the positive and negative socio-economic impacts of PT Rimba Harapan Sakti's plantation and

palm oil mill management activities. The data collection process was carried out by involving the community and workers as sources of information using the interview method, focus group discussions and distributing questionnaires in the village. In the report, there is also a matrix on the Social Management Plan and Social Monitoring Plan and an Attachment to the Attendance List of participants in the data collection process in Pematang Limau Village and within the scope of PT RHS Employees.

The data collection process was carried out by involving the community and workers as sources of information using interviews, focus group discussions and distributing questionnaires in the village. In the report, there is also a matrix on the Social Management Plan and Social Monitoring Plan and an Attachment to the Attendance List of participants in the data collection process in Pematang Limau Village and within the scope of PT RHS Employees. There are in the document attachments, evidence of participatory activities carried out in full and well documented.

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

3.4.2

Based on the results of document verification, it can be concluded that all management and monitoring parameters requested in environmental documents have been implemented. Company has also evaluated for each significant impact monitoring parameter that is implemented as required in Decree of Minister Environment No. 45 of 2005, which includes an evaluation of trends, evaluation of critical levels, and evaluation of compliance. The implementation of environmental management has been carried out in accordance with all management and monitoring plan (*RKL-RPL*) documents and Environmental Permits owned by the company. The certification unit makes *RKL-RPL* reports base on attachment of environmental document where the matrix is a compilation of all previously owned *RKL-RPL* matrix. The environmental management report is carried out every 6 months and submitted to the relevant agency. For example, company has shown *RKL-RPL* Report for Semester 1 of 2022 which was through SIMPEL (*Sistem Informasi Pelaporan Elektronik Lingkungan Hidup*) to Environmental Agency of Seruyan Regency, Environmental Agency of Center Kalimantan Province and Ministry of Environment and Forestry with electronic receipt ID 1650681467-2400. Based on the report on the implementation of the *RKL-RPL* in the semester 1 of 2021, it is known there is only surface water quality which has been above of quality standard in Government Regulation No. 22 of 2021. Testing result of surface water quality of first quarter of 2022 are above quality standard in BOD and COD parameters due to characteristics of the river which is a semi-peat swamp forest area, as well as permanently inundated areas. Besides, there is a fishing village in the upstream of the river and high rainfall so that there is runoff from the surrounding area. Company has established and done effort to handle this situation such as planting woody plants on riverbanks and prohibition of spraying using chemicals in riparian.

Meanwhile, the social impact monitoring and management plan has been managed and monitored through the SIA Implementation Report for 2021 based on the results of the SIA management plan 2019-2021. Social program from companies related to community development, economic improvement of the surrounding community, strengthening communication and networks with stakeholders, environmental improvement programs, and reforming the workforce. The program is equipped with activities to be carried out, challenges, opportunities, implementation strategies, expected outcomes, and implementation timelines. The planned program comes from the results of the Focus Group Discussion carried out in SIA activities that have been carried out in villages around company is added with the results of the analysis. The program is a general plan that will be implemented by the company based on the analysis of stakeholder needs and mapping of stakeholders related to company either directly or indirectly. Thus, the planned program is directed as far as possible to strengthen the company's relationship, communication and cooperation with all stakeholders in order to achieve

the company's goals. Activities are derivatives of programs that have been planned and are technical activities that will be carried out by the company in the context of implementing the planned program.

Based on analysis document from SIA Management Plan 2019-2021, The social impact in this assessment is divided into positive impact, and negative impact. Positive impact is an influence arising from the company's activities that provide better benefits/conditions for a particular object, while the negative impact is an influence from the company's activities which makes certain objects worse off. The social impact assessment is carried out based on the perceptions of the representative's community in the assessment location that represents that community. Community perception is the perspective of a group of people who live together in a certain environment that is the same in providing conclusion to an object. Conclusion on an object is formed based on knowledge, vision, and observation so that the community with each other allows to produce a different perception different for the same object. Company has analyzed the positive and negative impacts arising from each activity specifically, for example physical assets for production activities that have positive and negative impacts on both external and internal levels, and so on.

Based on the results of consultations with representatives' workers, there were no forms of discrimination against workers, no underage workers were found, the company has fulfilled the rights of its employees, several important facilities for employees have been provided by the company such as housing, water, electricity, places of worship, educational infrastructure (schools), and other facilities. The company also allocates resources for the maintenance of the entire facility.

Based on results of document review, interviews with company and field visits to the HCV area, it shows that there are potential social conflicts that may arise from the existence of land claims/occupation activities in the HCV area belonging to PT RHS. Company has made intense and consistent efforts in resolving these problems with documentary evidence that can be accounted for. Company has shown Social Impact Management and Monitoring Report for 2021 period, the Social Impact Management and Monitoring Evaluation Report for the 2022-2024 period, as well as the Social Impact Management and Monitoring Plan Matrix for the 2022-2024 period as follows.

- Implementation of management and monitoring in 2021 on social impacts includes employment opportunities, occupational health and safety, employee rights and facilities, consultation and communication mechanisms, labor stability, business opportunities, regional income, household income, institutional, community perceptions, social and cultural changes, community and employee unrest, tenure issues, and plasma plantations/partnerships. Based on the document, the company has made efforts to manage and monitor land claims in the main plantation by Suntir and Yadi Berti and Yetro Aye. In 2021, company has made an interactive approach to community landowners in the company's HCV areas.
- Social Impact Management and Monitoring Evaluation Report for the period 2022-2024 has included discussions on tenure issues. Based on the results of the document review, tenure problems over the last 2 years have decreased. For land issues, especially the HCV area, the company is currently in the review stage to formulate the best pattern and method for solving it. A review has been carried out by involving affected parties such as employees, the community around Pematang Limau Village, as well as the community who owns arable land in the PT RHS HCV area which was carried out on 19-20 May 2022, 24 May 2022, and 1-11 June 2022.
- Social Impact Management and Monitoring Plan Matrix for the period 2022-2024 has managed and monitored impacts on employment opportunities, occupational health and safety, employee rights and facilities, consultation and communication mechanisms, labor stability, business opportunities, regional income, household income, institutions, perceptions of the company, social and cultural changes, community and employee unrest, tenure issues, and plasma plantations/partnerships. Tenure issues include those stemming from the company's policy to obtain *HGU*, demarcation and land acquisition, company planting activities, replanting, and HCV area.

Based on the explanation above, company has conducted an in-depth study of the potential social conflicts that may arise from the existence of land claims/occupation activities in the HCV area by considering the positive and negative impacts, determining the social impact management program, integrating it with a correlative program and documenting it in SIA report.

3.4.3

Environmental Impact Assessment (EIA)

The company has documents, the implementation of the results of the environmental permit including reports to agencies in the form of *RKL-RPL* documents which are conducted every semester. The company can show proof of reporting in the form of a document affixed with a stamp, the name and signature of the recipient which is sent to relevant agencies such as company has shown *RKL-RPL* Report for Semester 1 of 2022 which was through SIMPEL (*Sistem Informasi Pelaporan Elektronik Lingkungan Hidup*) to

Environmental Agency of Seruyan Regency, Environmental Agency of Center Kalimantan Province and Ministry of Environment and Forestry with electronic receipt ID 1650681467-2400.

The implementation of environmental management and monitoring is carried out in accordance with the direction of the RKL-RPL as described in indicator 3.4.1. The effectiveness of environmental management and monitoring can be seen from the results of environmental management and monitoring analysis, which can also be seen from the suitability between the management and monitoring plans and their implementation in the field. The RKL-RPL document also shows that the company has managed all the impacts recommended in the UKL-UPL Documents. In general, the forms of evaluation carried out by the company include Trend Evaluation, Critical Level Evaluation and Compliance Evaluation. The RKL-RPL report discusses about:

- Microclimate Management. Actions such as planting LCC, reforestation, reducing the use of wood materials.
- Gas and dust management. Actions such as reforestation, watering the streets, installing signs for the use of PPE, installing OHS sign boards.
- Management. Actions such as management of use, machine maintenance, use of K3 tools, speed of transportation and provision of SOPs.
- Management of soil physical and chemical properties. Actions such as biomass utilization, EFB, LCC planting, preparation of midrib, IPM, scheduling of fertilizer & pesticide application, beneficial plans and domestic waste management.
- Management of river water quality. Management actions such as estate maintenance.
- Management of groundwater quality. Management actions are providing WWTP ponds, land application, maintaining ditches/waterways, maintaining monitoring wells.
- Management of river water discharge. Actions such as safeguarding riparian areas, performing HCV benchmarks, constructing reservoirs, calculating water use.
- Management of potential fires. Management actions such as using mechanical tools in land clearing/zero burning as stated in the pledge to care for the environment by the Governor. Central Kalimantan and the director of Wilmar on 14 July 2007, taking care of riparian, formation of fire team and fire tower.
- Flora and fauna. Actions such as explaining HCV management, establishing an HCV department, and making no-disturbing signage and RTE species, rehabilitating HCV areas, planting trees and installing HCV signboards and checking with camera traps for animal observations.
- Water bota management. Actions such as riparian management, not applying agrochemicals in riparian areas, creating oil traps and managing hazardous waste.
- Management of people's attitudes & perceptions. Management actions such as providing community development (CD) and CSR programs and their implementation.
- Management of community unrest. Actions such as providing community development (CD) and CSR, SOP for complaints, socializing plans on environmental issues.
- Quality management and public health. Management actions such as MCU for employees, health facilities.

Based on the results of field observations, it can be seen that the company has carried out environmental management in accordance with the RKL-RPL by installing signboard for conservation areas. In addition, there is also marking in the form of stakes and red paint for spray-boundary areas and other chemical applications. Based on the results of interviews with sprayer and fertilizer workers, they also stated that they were aware of the prohibition on applying chemicals to the buffer zone marked in red. In addition, they do not apply chemicals when they are close to water bodies such as canals, reservoirs or artificial ponds.

Social Impact Assessment (SIA)

The social management and monitoring plan is implemented, monitored and updated periodically in a participatory manner. In general, the social management plan of RHS POM is work programs from companies that are grouped into the social community, strengthening stakeholders, social culture and employment. The planned program is derived from the results of the Focus Group Discussions held in SIA 2021 activities that have been carried out in villages around company and the workers/employees within the company (already explain in 3.4.2).

Through the implementation of the SIA program RHS POM applies the RSPO 7 principles on social responsibility of palm oil mill and plantation management. For this reason, company is also carrying out the stages of the Free, Prior, Informed and Consent (FPIC) on CSR program to comply with the 7 RSPO principles. The principle of FPIC which is the basis for the company in carrying out the process of managing oil palm plantations in the CSR program involves women's representatives as community representatives who have an important role. Through this CSR program, it is hoped that it will be able to encourage women to be more active and involved

in decision making in villages that are CSR targets in accordance with the FPIC Principles. Referring to the results of the verification of the SIA 2014 study, RHS POM has implemented Free, Prior and Informed Consent (FPIC) in the management of its plantations and palm oil mills. The application of FPIC in every aspect of activities that involve interaction with the community is contained in the company's commitment to sustainability and in the company's obligations as a member of the RSPO. The implementation of FPIC is a manifestation of the company's respect for community rights and other social components related to company activities.

Based on the results of the study of the SIA document, company has a Social Impact Assessment Management and Monitoring Plan (SIA) which is prepared every 3 years, by collecting data related to community perceptions which is carried out periodically every year. Based on the results of the study of the SIA Report 2021, information was obtained that the last public perception data collection was carried out in December 2021.

However, based on the results of field findings and interviews from several sources of information that can have an impact on social aspects in the company such as land claims or occupations in HCV areas. This is an opportunity for improvement for the company to identify public perceptions that can cover all problems that exist during the future management of the SIA as described in indicator 3.4.2.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1-3.5.2

The company has a Human Resources System as follows:

- Recruitment Policy No. 023/DIR-KP/IV/2015 dated April 1, 2015 which explains that:
 - Meeting the needs of employees must be free from discrimination
 - Fulfillment of employee needs must ensure that prospective employees who are accepted have passed the administrative selection, soft competency selection, hard competence selection, medical test and other objective requirements.
 - Every employee who passes the selection must undergo a probationary period of 3 months where every month must be evaluated by superiors.
- Procedure for promotion of employees to the top No. SOP-PD-01 revision 1 dated June 1, 2008.
- Company policy for employees of Groups 2-7 with No.039/DIR-KP/IX/2015 revised 00 dated September 1, 2015.
- Company regulations for the period 2021-2023 which explain the human resource system, for example :
 - Article 4 concerning the appointment of permanent employees.
 - In article 7, which is about training and developing employee performance appraisals
 - Article 28 concerning termination of employment, including termination of employment due to reaching the retirement age limit.

The company has demonstrated a record of the implementation of employment procedures, for example:

Promotion

Decree No. 2566/HRGA-SK/XII/2021 dated December 31, 2021 regarding employee promotion, namely from Administration Jr Staff to Admin Staff and from group 3A to 3B and the results of the assessment/performance with the result that they can be promoted to Admin Staff.

Recruitment

For employee recruitment, the stages of recruitment are a job application letter, CV, photocopy of ID card, and supporting documents such as diplomas, transcripts and others. The company shows the employee track record documents that are stored, for example in the name with the initials SS who works at RHS 1 who previously submitted a letter of application and administrative documents, for which prospective employees will take part in a medical examination and the signing of a work agreement on March 4, 2022.

Employee assessment

Periodic employee assessment is carried out by the company with the aim of evaluating employees as well as increasing the class and wages given to employees. The last employee assessment was carried out for the 2021 period, for example, with the initials S who served in the water treatment plant section, he received an assessment of 62% with category B. In this assessment, the components assessed were work results and work behavior.

Work termination

The company shows termination documents, for example decision letter No 017/HRD-RHS1/SK-PHK/H/III/2022 dated March 1, 2022 regarding termination of employment for one of the personnel in maintenance positions for reasons of efficiency to prevent losses. Furthermore, the company has also calculated the financial rights that will be received by the employee on March 18, 2022 and has been paid on June 3, 2022 via bank transfer to the employee's account.

Status: Comply

3.6

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

3.6.1

The certification unit has carried out a risk assessment to identify Occupational Health & Safety issues in all operations, which is documented in the Hazard Identification, Risk Assessment and Determination Control (HIRADC) PT RHS Estate 1 & 2, revision 3, dated 01 July 2022. The document describes the types of work, potential hazards/risks that will arise, effects and risk categories, and risk control. This assessment covers all hazards and risks in the plantation, such as herbicide application, fertilization, harvesting and others. Based on field observations and interviews with workers in agrochemical warehouses, it is known that officers have understood the potential work risks and how to minimize these risks. The unit of certification also shows a HIRADC document for the mill unit that explains the results of hazard identification and control in FFB weighing operations, loading ramp stations, sterilizer station operations, thresher stations, press station operations, boiler station operations and so on.

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

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

Mitigation plans have been implemented, including the availability of workers assigned to the field and other work locations and have received training in First Aid in Accidents and providing emergency and OHS control facilities (described in indicator 6.7.2), providing personal protective equipment for workers (explained in indicator 6.7.3) and others.

In addition, the company also monitors the implementation of mitigation plans and issues related to OHS, which are carried out routinely in P2K3 meetings (explained in indicator 3.6.2).

The company has also reported the implementation and monitoring results of the mitigation plan in the P2K3 quarterly report to the Manpower Office.

3.6.2

Monitoring the effectiveness of the OHS plan in dealing with health & safety risks is carried out periodically through the monthly OSH Committee meeting which discusses OHS issues in the certification unit. The following are some recordings of activities monitoring the effectiveness of the OSH plan through monthly OSH Committee meetings:

Minutes of the PT RHS POM P2K3 Monthly Meeting, on June 25, 2022, with discussions covering EHS Training reviews, Housekeeping inspection and Safety, emergency equipment evaluations (Hydrants, first aid kits and fire extinguishers)

Based on an interview with the Seruyan District Manpower Office, it is known that work accidents have been reported periodically in the quarterly reports of the OSH Supervisory Committee. There are no cases of death.

Based on the results of field observations at the estate and mill, it is known that workers have used Personal Protective Equipment (PPE) in accordance with the PAD Matrix and PPE SOPs, such as for harvest workers using boots, gloves, goggles and helmets, spray workers using aprons, masks carbon, goggles, rubber gloves and boots and factory workers use safety shoes, ear plugs/ ear muffs and masks.

Based on the results of interviews with workers in both estates and mills, it is known that PPE is provided free of charge to all workers in the workplace. Meanwhile, if the employee damages intentionally/lost due to the negligence of the worker, the worker must replace it according to the specifications that have been set.

Based on the results of field observations, for example in the RHS Estate-II housing block E54 and block K72, it is known that the company has provided sanitation facilities for herbicide and fertilizer applicators, which function so that workers who use pesticides and chemicals such as fertilizers can remove PPE, clean themselves and wearing personal clothes.

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 demonstrated a training program for each unit in 2021 covering all aspects of the P&C RSPO. The training also covers those who need training such as staff, workers, smallholders and contractors. The sustainability team and HR department are responsible for developing training program scheduling and training implementation. The training program document informs the type of training, plan/schedule and attendance. 2021 training programs such as:

- Basics of OSH and the environment
- First aid training
- Toxic hazardous material and toxic hazardous waste management training
- MSDS Training
- Operator license
- RSPO-ISPO & SCCS training
- Emergency response training

The company also shows the realization of training, for example:

- Minutes of the HIRADC review on 19-20 February 2021 which discussed the submission of risk assessments for work plans, additional mechanical pruning activities, etc. which was attended by 22 participants.
- Minutes of training on handling toxic hazardous material, toxic hazardous waste, MSDS and use of light extinguisher which was held on July 13, 2021, which was attended by 5 participants.
- Minutes of the meeting on alert for forest and land fire prevention which will be held on April 24, 2021 for 20 participants.

The results of interviews with representatives of bipartite cooperation institutions and workers such as warehouse officers, harvesters, fertilizer workers, grading officers, boiler officers stated that the company had provided training or socialization on working procedures to each worker verbally and understood by workers. In addition, the results of interviews with boiler officers, it was also stated that these workers had been given boiler officer training. There are training programs that involve contractors, such as socialization of SOPs and training related to OHS. From the results of interviews with workers and contractors, it is known that workers and contractors can explain the training that has been obtained such as work procedures and implementation of OHS.

3.7.3

RHS POM demonstrated supply chain training on April 12, 2022, which was attended by 15 employees from security guards, weighbridges, sorting and grading divisions, staff, CPO and PK Transporter, administration and production clerk. Based on the interviews with weighing officers and security, known that the resource persons can explain their duties and understanding related to the supply chain well.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 & 3.8.2

Based on FFB processing document known the FFB is from certified and uncertified area. Thus, RHS POM implemented MB Module

3.8.3

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

Product	Estimate Production period of 22 February to 07 December 2022	Actual Production (MT) of previous audit	Estimate Production of 12 month (MT) further
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(February to August 2022)

FFB	157,500	142,839.91	164,200
CSPO	35,440	26,120.23	36,200
CSPK	7,875	5,696.20	7,400

* Production estimation is based on actual production for a period of 1 year before the assessment is carried out (September 2021 – August 2022)

3.8.4

Rimba Harapan Sakti POM has registered in RSPO IT platform with information :

- Member name : PT Rimba Harapan Sakti
- Member ID : RSPO_PO1000003486
- Member Country : Indonesia
- Member category : Oil Mill
- Core product : Palm Oil
- License ID : CB129975
- RSPO membership number : Wilmar International Ltd (No.2-0017-05-000-00)

3.8.5

RHS POM has procedure about supply chain in RSPO Supply Chain Certification Procedure document no. SOP 01/RSPOSCC-MB/MILL/(1)/0921 Revision: 01 validation date: 28 September 2021. This document explains about the procedure related to supply chain model IP and MB, the person in charge of RSPO supply chain, the mechanism of goods in, outsourcing, selling product, training, recording related to RSPO supply chain, claim, complaint procedure, internal audit, etc. This procedure has socialized to PIC of supply chain on April 2022.

SOP has been refer to the latest SCCS requirement and based on interview to relevant persone i.e production clerck, weightbridge officer, and SCCS PIC known they all can explain well about the supply chain model applied in RHS POM.

3.8.6

RHS POM has procedure related to internal audit in document RSPO Supply Chain Certification Procedure document no. SOP 01/RSPOSCC-MB/MILL/(1)/0921 Revision: 01 validation date: 28 September 2021. Based on procedure, the internal audit is conducted at least once a year. The RSPO P & C internal audit has conducted on 13 – 16 June 2022. There are 0 nonconformities related to supply chain aspect. The company also shows the Minutes of Management Review for the period 2020 – 2021 dated March 26, 2022. Aspects discussed include company policies, operational conditions in 2021, internal audit results, and compliance with laws and regulations.

3.8.7

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

Product	Estimate Production period of 22 February to 07 December 2022	Actual Production (MT) of previous audit (February to August 2022)
FFB	157,500	142,839.91
CSPO	35,440	26,120.23
CSPK	7,875	5,696.20

Based on the table above, it is known that there has been no overproduction between the license quota and the actual production. Based on the estimated production until 07 December 2022, it is also known that there is a possibility of over production at the end of the license period. As regulated in the Production Increase Information SOP Document number RHS-POM-SOP-ADM4603B-PR Rev 02 dated June 19, 2020, it is stated that a 3-monthly review will be carried out to monitor excess production. The 3-month monitoring period at the time of this assessment will be at the end of September 2022

Related for handling non-conforming oil palm products, has been set in RSPO Supply Chain Certification Procedure document no. SOP 01/RSPOSCC-MB/MILL/(1)/0921 Revision: 01 validation date: 28 September 2021. This procedure is generally applied to all complaints aspects, including complaints and non-conforming products from customers/buyers. During the audit, there is no written complaint from stakeholders related to nonconforming products

3.8.8

The unit of certification shows sales documents for RSPO certified products as can be seen from the following information :

Seller	Buyer :
Member Name : PT Rimba Harapan Sakti	Member name : PT Multimas Nabati Asahan
Member ID : RSPO_PO1000003486	
Seller reference number : CPO MB – Juni 2022	
Product Name : CSPO	Transaction ID : TR3c631acd-dff3
Supply Chain Model : Mass Balance	Creation date : 14-07-2022
Volume : 1,798.65 MT	Confirmation date : 19-07-2022
Shipping/BLdate : 03-06-2022	

The sales document has been informed several information for example shipping date on 03 June 2022, transaction ID number TR3c631acd-dff3, Volume product, and RSPO certificate number for seller RSPO_PO1000003486

3.8.9

The Mill outsources its products transportation to the third parties and has contractual agreements. CSPO and PK transporter handled by PT Marga Dinamik Perkasa, CV Tri Mitra Sejahtera, CV Ain Ito, CV Maryscha Elok Sejahtera. To ensure the contractors complies with the RSPO Supply Chain, in the agreement, there were clauses that set obligations of the contractor to comply with the supply chain rules. In addition, there is also a commitment letter stating that the third party is willing to provide access to the CB for auditing if necessary

RHS POM also carries out outsourcing activities for the storage of CPO and PK. CPO and PK that will be purchased by the buyer are deposited in advance to PT Wilmar Nabati Indonesia. POM shows a cooperation agreement between PT Wilmar Nabati Indonesia and PT Rimba Harapan Sakti valid until 2022.

Based on interview with CV Ain Ito representative as one of CPO Transporter the sourceperson known they aware relate clausul of the third party is willing to provide access to the CB for auditing if necessary.

3.8.10 & 3.8.11

The Mill has the record of details of the contractors, covers the contractor company profile, address, contact person, email and phone number, contract agreement and period, and list of vehicles. The contractors used are PT Marga Dinamik Perkasa, CV Tri Mitra Sejahtera, CV Ain Ito, CV Maryscha Elok Sejahtera . There is no new contractors and transporter since previous assessment to this assessment

3.8.12

Rimba Harapan Sakti POM has record all certified FFB, CSPO, and CSPK as presented in table below

- FFB : 142,839.91 MT

- CSPO

Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)			Total	Stock CPO	
	Cert	Non Cert		RSPO	Other scheme	Non Cert		Cert	Non Cert
Feb – August 2022	26,120.23	2,388.07	28,508.32	25,801.88	-	-	25,801.88	316.35	

*Opening stock CSPO 351.04 MT

*Opening stock Non CSPO 70,98 MT

• CSPK

Period	PK production (MT)		Total	Cert PK Dispatch (MT)			Total	Stock PK	
	Cert	Non Cert		RSPO	Other scheme	Non Cert		Cert	Non Cert
Feb – August 2022	5,696.20	516.06	6,212.23	5,596.66	-	-	5,596.66	99.51	

*Opening Stock CSPK 84.31 MT

*Opening stock Non-CSPK 11.60 MT

Based on MB calculation data, it is known that the stock of CSPO and CSPK is positive because the amount of production is bigger than the number of sales.

3.8.13

Extraction rates from CPO and PK production are based on actual production data. Over the past 12 months, the extraction rate for CPO was 21.51 % and PK was 4.01 %.

3.8.14

Estimates for extraction rates are based on actual production of CPO and PK from the previous month. Apart from production, it is also affected by the age of the oil palm plantations. The estimation of OER is 22.00% and KER is 4.50 %

3.8.15

Rimba Harapan Sakti Mill only apply MB Module

3.8.16

The certified product sold under RSPO scheme in the license period are :

	Dispatch period (MT) Feb – August 2022
	Total
CSPO sold under RSPO Scheme	25,801.88
CSPO sold under other scheme	-
CSPO sold as conventional	-
CSPK sold under RSPO Scheme	5,596.66
CSPK sold under other scheme	-
CSPK sold as conventional	-

The company shows examples of sales documentation, for example for transaction number TR-3c631acd-dff3, which among others informs the following:

- Seller
Member Name : PT Rimba Harapan Sakti
Member ID : RSPO_PO1000003486
- Buyer
Member Name : PT Multimas Nabati Asahan
Member ID : RSPO_PO1000000150
- Transaction
Seller reference number : CPO MB – Juni 2022
Buyer reference number : USJ XVII-042203

- Product Detail
Product Name : CSPO
Volume : 1,798.65 MT
- Transport Detail :
Shipping/BL Date : 03/06/2022
Ship name : BG.USJ XVII
B/L Number : USJ XVII-042203
Creation date : 14.07/2022
Confirmation date : 19/07/2022

Shipping announcement issued less than three months since the product delivered seen from Shipping date on 03 June 2022 and confirmation date on 19 July 2022.

3.8.17

The products are claimed as mass balance and conventional. The Mill does not use RSPO logo on product or off product

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

The certification unit has established a policy related to the Defending of Human Rights which was reviewed last on 10 December 2021. Some of the things stated in the policy are that the Wilmar Group supports the protection of human rights defenders, respects the rights of human rights defenders and prevents and mitigates human rights risks. involved in the business operations and supply chain of the Wilmar Group. The certification unit shows documentation of the socialization of human rights policies which was carried out on 24 May 2022 at the Pematang Limau Village Hall. The policy is communicated to employees, the surrounding community and contractors.

4.1.2

Based on document review, interviews with management, interviews with community representatives (Pematang Limau Village) and field observations, it is known that the certification unit does not use security personnel/private security officers. The unit of certification uses its own employees as security units for estates and mills. Based on interviews with estate and mill employees as well as village representatives revealed that there were no problems of confrontation and intimidation by the certification unit to maintain peace and order.

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

The company has the following procedures:

- Employee Complaint Procedure No. document SOP42/HRD/(1)/1117 revision 1 dated November 1, 2017. In the procedure it is explained that:
 - Employees submit complaints directly to superiors and superiors must respond with a settlement time of less than 2 days.
 - If there is no resolution or response or the employee is not satisfied, the complaint can be submitted to the next superior with a response and settlement time of no later than 3 days.
 - If it cannot be resolved, the complaint can be submitted to the managerial level with a settlement time of 1 week after the complaint is received.
- Procedures for Receiving Complaints and Settlement of Disputes, in particular out of court disputes. SOP34/PR/(4)/0921 dated 21 September 2021. In this procedure it is explained that:
 - Complaints are submitted in writing or submitted through the annual meeting by filling out the complaint form
 - If an agreement has not been reached in the deliberation, then mediation is sought by involving local governments such as sub-districts or districts

- If no agreement is reached, legal action will be taken in accordance with applicable law
- The company also has a Complaint Procedure for the Application of Wilmar's No Deforestation, No Peat, No Exploitation (NDPE) Policy update version 2.0 June 2019. In point 4 in the document, it is explained about the Protection of Human Rights Defenders, Whistleblowers, Complainants and Public Spokespersons as well as complaints cases that can be investigated through external mechanisms such as the RSPO complaints procedure.

The results of interviews with workers and representatives of bipartite cooperation institutions, it is known that workers understand the complaint mechanism. Complaints can also be submitted to the bipartite representative. From the interviews, it was stated that workers' complaints were usually related to home improvement complaints and had been followed up by the company.

The results of interviews with contractors (PT Sabindo/FFB Transporter) and representatives of Pematang Limau Village showed that villages and contractors had understood the complaint mechanism. From the results of the interview, it is known that there are no complaints from external parties.

4.2.2

The company has a Complaints Procedure for the Implementation of Wilmar's Zero Deforestation, No Peat, No Exploitation (NDPE) Policy updated version 2.0 June 2019. The procedure explains that any party can appoint a third party to submit their complaint provided the third party follows the procedure and has been given the mandate clear.

The company also has an employee complaint procedure with document number SOP 42/HRD/(1)/1117 revision 1 dated November 1, 2017 which was approved by the General Manager. The procedure explains that the submission is made orally and in writing. In addition, employees work closely with work representatives at bipartite cooperation institution or WOW to socialize the communication and consultation system that applies in the company, including handling employee complaints. So that all employees, including those who cannot read and write, can be assisted by bipartite cooperation institution and WOW.

4.2.3

Based on the results of interviews with stakeholders such as relevant agencies, village representatives, contractors, Plasma Cooperatives and employees, it can be concluded that the parties are aware of the complaint mechanism submitted to the company. From the document review, it is known that there are several complaints from the parties which have been followed up by the company, for example, such as:

- Minutes of employee complaint dated March 14, 2022 regarding the back porch of the house at C75 that was damaged. Complaints have been responded to and repaired by plastering the cracked and perforated floors on March 21, 2022.
- Minutes of employee complaint dated June 10, 2022 regarding the road shaft that was damaged when it rained. Complaints have been responded to and followed up by stockpiling using sand and rocks on June 16, 2022.

4.2.4

The Company has Procedures for Receiving Complaints and Settlement of Disputes, especially disputes out of court No. SOP34/PR/(4)/0921 dated 21 September 2021. In this procedure it is explained that:

- Complaints are submitted in writing or submitted through the annual meeting by filling out the complaint form.
- If an agreement has not been reached in the deliberation, then mediation is sought by involving local governments such as sub-districts or districts.
- If no agreement is reached, legal action will be taken in accordance with applicable law.

The results of interviews with contractors and village representatives showed that villages and contractors had understood the complaint mechanism. From the results of the interview, it is known that there are no complaints from external parties.

Status: Comply

4.3

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

4.3.1

Contribution to the development of the community around the company is realized in the form of CSR. The preparation of the CSR program has been based on consultation with community representatives as indicated by socialization and agreement with community representatives in December 2021. Community representatives consist of the Acting Village Head of Pematang Limau, Pematang Limau BPD, Pematang Limau Community Leaders and Pematang Limau Youth Leaders.

Areas that are the focus of development include Coordination and Public Communication: Routine Village Visits, Economy, Arts, Culture and Sports, Incidental Donations, Emergency Response, Village Infrastructure and Religion. The realization of the program, for example, is assistance for the construction of habitable houses for 2 residents of Pematang Limau village on January 3, 2022, basic food assistance for the city of Palangka Raya and basic food assistance for Seruyan Regency. The results of consultations with representatives of Pematang Limau Village, it is known that the company has realized a CSR program which was prepared on the basis of the participation of the Village parties such as the Village Head, BPD, community leaders, and youth leaders.

Based on the description above, it can be concluded that the company has contributed to community development based on the results of consultations with the community.

Status: Comply

4.4

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

4.4.1; 4.4.2; 4.4.4

The scope of certification covering an area of 13,789.75 ha. This area has had the land title in the form of HGU (*Hak Guna Usaha*) based on decree of Head of Indonesia National Land Agency No. 26/HGU/BPN RI/2011 dated 13 June 2011 for an area of 13,789.745 ha. This area were from forest area that has been released base on Decree of Forestry Minister No: SK.100/Menhut-II/2005, on 21 April 2005 for an area of 16,702.26 Ha. The compensation process of other rights in the HGU has been conducted since 2009 to 2021. The company also has had plantation business permit in the form of IUP (*Ijin Usaha Perkebunan*) based on Regent Decree No. 188.45/1.6.1/2015, dated 14 April 2015, covering an area of \pm 13,800 ha and 45 tons FFB/hour of Mill's capacity.

In the HGU area there is an area of \pm 125.34 Ha which is declared as community/occupational cultivation and an area of \pm 2,571 Ha is an HCV area that has not been compensated (In this assessment, from an area of \pm 2,571 Ha remaining 1,286.20 Ha that has not been compensated/ still in the control of the other party). The area has been mapped and the land owners/claimers identified.

However Unit of Certification has SOP No. SOP 30/BM/(0)/0409 issued on 1 July 2010 on FPIC. Procedures explaining the land compensation process through FPIC begin from identification of landowners, Input data (soil mapping), Negotiating compensation (according to the agreement and witnessed by a competent witness), payment of compensation, documentation. In addition, there is SOP No. 43/PR/(2)/0510 on recognition and company commitment to customary rights and community legal rights, issued on 17 May 2010.

4.4.3

The maps shown by the company include the following:

1. Map of the company operational area which includes block boundaries, emplacement locations, estate boundaries, and HGU boundaries
2. Map of the occupation area
3. Map of distribution of HGU pole
4. Overlay HGU map with HCV areas that have been compensated or HCV areas that are still under the control of other parties

The maps are made by the internal mapping team with a scale of 1: 50,000 and are equipped with legends

4.4.5

Based on the land acquisition documentation shown by the company, it is known that the land owner acts for himself without being represented by any party. External parties are more like witnesses to ensure the transaction goes according to the agreement. The results of an interview with one of the previous land owners from Pematang Limau Village, it was found that the socialization process from the company related to land release was carried out individually or jointly involving village officials and community leaders. There is no coercion or intimidation when the process is carried out

4.4.6

Based on the results of interviews with representatives of Pematang Limau Village and KMS Cooperative as parties who understand the process and agreement for land release, it is known that the company has fulfilled the commitments and agreements submitted, such as:

1. Development of plasma plantations 2. Labor recruitment 3. Implementation of CSR		
		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 Based on the results of the document review and interviews with stakeholders including village representatives of Pematang Limau and Seruyan Regency BPN representatives, it is known that until now there has been no additional permit or expansion of the company operational area. GRTT process were carried out in the period 2009 – 2021. Unit of Certification has SOP No. SOP 30/BM/(0)/0409 issued on 1 July 2010 on FPIC. Procedures explaining the land compensation process through FPIC begin from identification of landowners, Input data (soil mapping), Negotiating compensation (according to the agreement and witnessed by a competent witness), payment of compensation, documentation. In addition, there is SOP No. 43/PR/(2)/0510 on recognition and company commitment to customary rights and community legal rights, issued on 17 May 2010.		
4.5.2 Company already has HGU based on decree of Head of Indonesia National Land Agency No. 26/HGU/BPN RI/2011 dated 13 June 2011 for an area of 13,789.745 ha. This area were from forest area that has been released base on Decree of Forestry Minister No: SK.100/Menhut-II/2005, on 21 April 2005 for an area of 16,702.26 Ha. The compensation process of other rights in the HGU has been conducted since 2009 to 2020. There is a new land acquisition by the company for the HCV area in 2021 which are owned by another party. The following recapitulate is for an area 649,23 Ha (5 land owners) dan 201 Ha (8 Land owners). Companies can show examples of land acquisition documentation, for example for initial SRS in the form of willingness to relinquish rights and proof of payment including land maps		
Based on the interviews with representatives of the Pematang Limau community, it is known that the land acquisition process has been based on the agreement of both parties. The company		
4.5.3; 4.5.4 Based on interview with representative of Pematang Limau surrounding communities, it was known that process of compensation has been carried out smoothly, transparent, voluntary and fair through participative and FPIC approach. Process of compensation or acquisition has conducted through FPIC manners and did not diminish any legal rights and/or customary rights. Previous land owner also informs during the acquisition the process is transparent and inform the planning for oil palm plantation development in their area. Especially for land acquisition in 2021, it is for HCV areas that are still owned by other parties.		
Regarding the latest land acquisition, in 2019 it was actually agreed to build a partnership plantation covering an area of ± 412 Ha. The land cannot be acquired in its entirety, so a new land area of ± 1,542 ha is sought but is included in the forest area. In its development, a Community Forest Utilization Permit has been issued by the Ministry of the Environment of the Republic of Indonesia, but oil palm is not allowed to be planted. The company and the community have agreed to replace the commodity with corn and have conducted a comparative study on 17-20 March 2020 to corn cultivation companies, but after careful scrutiny, the Community Forest Utilization Permit also includes a prohibition on land clearing and clear cutting so that the realization of the partnership cannot be realized.		
4.5.5; 4.5.6 Interview with representative of previous land owners and surrounding communities from Pematang Limau Village known that they have access to information and advice such as from head of village of community figure regarding impact of land acquisition and also the oil palm plantation development. They also inform, head of village of community figure was take an active role during the initial development of plantation until the land title process		
4.5.7 Company already has HGU based on decree of Head of Indonesia National Land Agency No. 26/HGU/BPN RI/2011 dated 13 June 2011 for an area of 13,789.745 ha. This area were from forest area that has been released base on Decree of Forestry Minister No: SK.100/Menhut-II/2005, on 21 April 2005 for an area of 16,702.26 Ha. The compensation process of other rights in the HGU has been		

conducted since 2009 to 2020. There is a new land acquisition by the company for the HCV area in 2021 which are owned by another party. The following recapitulate is for an area 649,23 Ha (5 land owners) dan 201 Ha (8 Land owners). Companies can show examples of land acquisition documentation, for example for initial SRS in the form of willingness to relinquish rights and proof of payment including land maps

Based on the interviews with representatives of the Pematang Limau community, it is known that the land acquisition process has been based on the agreement of both parties. **The company does not impose if the community does not have the willingness to relinquish their rights**

4.5.8

Based on interview with community sighted that there is no communities in voluntary isolation around the certification unit.

Status: Comply

4.6

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

4.6.1; 4.6.2

The company has procedure to identify legal rights, customary, rights and procedure to identify persons entitled to compensation in the SOP document for Settlement of Land Disputes (SOP 30/BM/2/0320). This document explains about the factors that cause land disputes, which also includes the sequence for identifying people who are entitled to compensation.

The results of interviews with representatives of Pematang Limau Village revealed that the land release process was preceded by socialization and then negotiations and after an agreement was reached, a compensation process would be carried out. The company also respects communities who do not want to relinquish land ownership rights. There was never intimidation and coercion in the whole process

4.6.3

Company showed the land compensation recapitulation since 2009 – 2021 in document of List of Land Compensation in PT Rimba Harapan Sakti. Based on the list, also found woman as the previous land owner which compensated.

4.6.4

Company already has HGU based on decree of Head of Indonesia National Land Agency No. 26/HGU/BPN RI/2011 dated 13 June 2011 for an area of 13,789.745 ha. This area were from forest area that has been released base on Decree of Forestry Minister No: SK.100/Menhut-II/2005, on 21 April 2005 for an area of 16,702.26 Ha. The compensation process of other rights in the HGU has been conducted since 2009 to 2020. There is a new land acquisition by the company for the HCV area in 2021 which are owned by another party. The following recapitulate is for an area 649,23 Ha (5 land owners) dan 201 Ha (8 Land owners). Companies can show examples of land acquisition documentation, for example for initial SRS in the form of willingness to relinquish rights and proof of payment including land maps

Based on the interviews with representatives of the Pematang Limau community, it is known that the land acquisition process has been based on the agreement of both parties. The company does not impose if the community does not have the willingness to relinquish their rights

Status: Comply

4.7

Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.

4.7.1; 4.7.2

The company has procedure to identify legal rights, customary, rights and procedure to identify persons entitled to compensation in the SOP document for Settlement of Land Disputes (SOP 30/BM/2/0320). This document explains about the factors that cause land disputes, which also includes the sequence for identifying people who are entitled to compensation.

The results of interviews with representatives of Pematang Limau Village revealed that the land acquisition process was preceded by socialization and then negotiations and after an agreement was reached, a compensation process would be carried out. The company

also respects communities who do not want to relinquish land ownership rights. There was never intimidation and coercion in the whole process.

4.7.3

Based on the results of a document review and interviews with representatives of the communities Pematang Limau Village it is known that the benefits obtained by people who have lost their land rights include:

1. Opening of road access
2. Recruitment of workers from the surrounding village community
3. The realization of plasma plantation development is managed in a full managed manner under KMS Cooperative

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

At the time of ASA-1.2 there was an area of 125, 34 Ha which was included in the occupation and an HCV area of 2,571 Ha which was still owned by other parties because it had not been compensated since the beginning. In this regard, the company has made efforts to acquire land and has made compensation for an area of 1,284.80 hectares. The remaining area of 1,286.20 hectares has yet to be compensated. Regarding this, the company entered into a cooperation agreement with KUD Sawit Pukun Lestari to provide an area of ±412 Ha for the development of community plantation (outside HGU). At the time of surveillance 1.2 was carried out the cooperation agreement with KUD SPL had ended. Meanwhile, in its development the area of ±412 Ha cannot be fully controlled because there are other parties' ownership rights. In its development, a replacement land was sought so that it obtained a total area of ± 1,542 Ha. The land is in the forest area.

In accordance with the Decree of the Minister of the Environment Number SK: 10602/MENLHK-PSKL/PKPS/PSL0/12/2019 concerning the granting of a business permit for the use of Community Forests for an area of ±1,542 Ha in a Permanent Production Forest Area of ±872 Ha and a convertible Production Forest of an area of 670 Ha. Permission has been given to manage the land but in one of the decrees it is stated that oil palm cannot be planted.

With this obligation, the company and the community have agreed to convert commodities into corn and have conducted a comparative study with PT Cheill Jedang Field Kalimantan on 17-20 March 2020. Until now, the development of the corn partnership has not been able to be carried out due to the continuation clause of the Community Forest Utilization Permit. There is a clause that states that it is forbidden to open new land by land clearing or clear cutting

Based on the description above, it can be concluded that for now there are no land conflicts that occur openly and disrupt the company's operations. However, there are still unfinished partnership processes and the acquisition of 1,286.20 Ha of HCV land that is still constrained. With respect to an area of 1,286.20 hectares, according to information from the management representative, until now the names of the land owners have been obtained based on the first land measurements since the construction of the estate, but they are still confirmed and re-matched with the Village party regarding the basis of the rights they have so that at least if the area is indeed controlled by another party, it has a recognized right base.

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1

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

5.1.1

The current and previous FFB prices are publicly available and can be accessed by farmers online. In the agreement, it is stated that the price of Plasma FFB is determined based on the decision of the governor or government which has duties and responsibilities in the process of determining the price of plasma FFB every month. Currently, FFB pricing is based on the Central Kalimantan Provincial Plantation Service's pricing once a month. The company shows the Minutes of Meeting Results of the FFB Purchasing Pricing Team for April, May, and June 2022.

The company can also show a Partnership Cooperation Agreement between PT RHS and the Makmur Sejahtera Cooperative in the context of developing and managing an oil palm plantation with a partnership pattern of 377.24 Ha in Seruyan Hilir District, Seruyan Regency, Central Kalimantan Province on November 7, 2017, known to the Regent of Seruyan. In article 5, the term of the partnership cooperation is valid from the time the agreement is signed until the age of the oil palm plantation reaches the age of approximately 25 years or until the oil palm plantation has no economic value and can be continued if the first party (cooperative) still wishes to cooperate. FFB price are set in work agreement that agreed by both parties. Some considerations in determining the price of FFB such as CPO prices, transportation costs, and the proposed price from the supplier.

The pricing mechanism has been explained in the FFB purchase agreement which was signed by both parties. The interview with management unit also obtained information if FFB prices that has been determined are available and could be accessed by suppliers, information on price changes was made via SMS, WA and telephone to the supplier's PIC.

5.1.2

Based on document review, field observation and interviews with staff and management, it is known that RHS POM does not purchase FFB from third parties/ FFB suppliers. RHS POM only accepts FFB from the own estate, own plasma and plantations from the group as described in indicator 2.3.1. Information about FFB price was obtained that all documents related to pricing issued by the Plantation Agency can be accessed by supplier directly from the Plantation Office or communication media (handphone). In addition, unit of certification regularly explains the FFB pricing to supplier, the company also has a mechanism to convey prices. Based on the results of interviews with Plasma representative, stated that the price set by the company was in accordance with the price set by the local Plantation Service, where if there was a price update, the company immediately submitted the latest price through the FFB supplier communication group owned by the Certification Unit.

5.1.3

The company has made a fair price determination that has been agreed upon with the supplier, which is documented in the Letter of Agreement, in the document there is a statement that the price set to determine the FFB selling price is the price set by the Plantation Office Pricing Team, so that the parties hereby declare that they will obey the price fixing so that one party and the other party are not entitled to request an increase or decrease in price. There are also specifications and implementation requirements as well as sanctions that must be met by the second party.

In the Partnership Agreement Document that has been agreed explains that the funds from the sale of FFB there are deductions between the company and the cooperative. Proof of payment of FFB results can be seen in the official report on the sale of FFB for plasma plantations (*Koperasi Makmur Sejahtera*), for example for the period 1 April 2022 to 30 June 2022 (Quarter 2). The information in the document includes operational costs, gross yields, net proceeds before tax, net income after tax, value-added tax, income tax deductions 23, insurance and others. Payments are made every 3 months, the company can prove it with proof of a transfer note document made on 22 July 2022 for the 2nd quarter period (April, May, and June).

5.1.4

The company can show evidence that parties from the organization's representatives (*Koperasi Makmur Sejahtera*), have been involved in the decision-making process and understand the contents of the contract. This is stated in the document Letter of Agreement signed by all representatives of the cooperative management and farmer groups. Letter of Agreement contains the FFB sale and purchase agreement to independent smallholders, as well as an agreement on a partnership scheme with plasma farmers.

The company has made improvements to the welfare of the communities around the plantations by building and fully managing plasma plantations, namely *KUD Koperasi Makmur Sejahtera* with the initial cooperation agreement established in 7 November 2017. The company assigns Managers and Assistants to help manage plasma. *KUD Koperasi Makmur Sejahtera* supplies all FFB to RHS POM in accordance with the contract agreed by both parties, its members consist of 355 farmers from surrounding villages, where members consist of all members who want to be involved, not limited to men or women. Women who are members of the cooperative are also involved in the company's operational activities such as the results of field visits to fertilizer and spraying workers who are all women. In addition, for positions such as fertilizer foreman in cooperatives, the chairperson of labor unions and gender associations is a woman. They are also involved in determining the agreement between the two parties.

5.1.5

The company shows the Partnership Cooperation Agreement between PT RHS and the Makmur Sejahtera Cooperative in the context

of developing and managing a partnership pattern of oil palm plantations covering an area of 377.24 Ha in Seruyan Hilir District, Seruyan Regency, Central Kalimantan Province on November 7, 2017, known to the Regent of Seruyan. In the Partnership Cooperation Agreement in article 5 the term of the partnership is valid from the time the agreement is signed until the age of the oil palm plantation reaches the age of approximately 25 years or until the oil palm plantation has no economic value anymore and can be continued if the first party (cooperative) is still willing to cooperate. The document is signed by each party, namely: Company Representative; Chairman, Secretary and Treasurer of the Cooperative and witnessed by the Regent of Seruyan. The company also shows the Decree of the Regent of Seruyan Number 188.45/428/2015 concerning the Determination of Prospective Farmers and Prospective Land for the Prosperous Prosperity Cooperative, Pematang Limau Plantation Revitalization Program in Seruyan Hilir District, Seruyan Regency.

5.1.6

Article 29 of the MOU contains payment procedures/systems. The payment of net proceeds from the sale of Plasma FFB is regulated and agreed as follows:

- Payment through the fund book-entry system at the Bank
- Payment every 3 months
- Payment is made based on the Minutes of Calculation of the sale and purchase of plasma FFB and the Minutes of Sale and Purchase of Plasma FFB which have been signed by the parties.

The company shows the Minutes of payment from the sale of FFB from the Makmur Sejahtera Cooperative Pematang Limau Village by PT RHS for the period from 1 April 2022 to 30 June 2022 (Quarter 2). In the official report, the results of the sale of FFB for the period after being subject to tax deductions and operational costs are included. The minutes are signed by the cooperative and the company.

The company every quarterly period makes a presentation related to the results and an explanation of the costs of plasma plantation products. This is indicated by the minutes of the presentation of the results and an explanation of the operational costs of the plasma plantation results in the 2nd quarter of 2022 which were attended by representatives from the cooperatives and companies. In this activity, the calculation of the results of the Makmur Sejahtera Cooperative with the remaining outstanding debts is explained. Payment has been made and can be proven through a receipt for payment.

5.1.7

The company has tested the electronic weigh bridge which was carried out on 12 May 2022 and ratified on 20 May 2022 by Head of Cooperative, Small and Medium Enterprises, Industry and Trade Agency of Seruyan Regency and valid until 26 May 2023 with evidence, among others:

- Test Result Certificate number 510/216/BID.IV/TJ/V/2022 for serial number 113850204 with a Max capacity of 50,000 Kg
- Test Result Certificate number 510/217/BID.IV/TJ/V/2022 for serial number 141050374 with a Max capacity of 50,000 Kg

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

5.1.8

The company has conducted socialization related to RSPO certification to cooperatives/plasma farmers through annual meetings between companies and cooperative members. The company showed the Minutes of the annual meeting on 24 May 2022 in Pematang Limau Village which was attended by the company, village government, community representatives and plasma farmers. In addition, this meeting also disseminated RSPO-SCCS & ISPO certification to Contractors, Managers and Plasma Members. From the results of the two meetings, it was stated that plasma smallholders would participate in the company's initiation to include their lands for RSPO certification and will comply with all existing requirements and regulations.

The results of interviews with the company's management stated that until now, the process carried out is still constrained by the legality of the land, but the company continues to assist the plasma farmers. For 2021, the company has identified land for which new land will be cleared with New Planting Procedures (NPP) activities, where the location will be handed over to the plasma for additional plantation area with a total area of 224 Ha. The company has also included the Makmur Sejahtera Cooperative in the 2023-time bone plan, which is the company's initiation to include Plasma for RSPO certification with a full Managed scheme by the company. For 2022, the company has completed carrying out the New Planting Procedures (NPP) activities for the addition of plantation area with a total area of 224 Ha as of date based on RSPO email <nppsubmission@rspo.org> to CB <naila@mutucertification.com> dated 26 June

2022 stating that NPP has finished with zero comments.

5.1.9

Based on the results of interviews with the company's plasma section, that related to the complaint handling mechanism, it still refers to the SOP for receiving complaints and resolving disputes outside the court document number SOP 34/PR(3)/2017. Public complaints can also be submitted at the annual meeting by filling out the complaint form provided by the company and then stated in the Minutes of the Annual Meeting. This is regulated in the procedure document No. SOP 35/PR(3)/0921 Revision 03 dated 21 September 2021 regarding the Mechanism for Implementation of Communication and Consultation with the Community. Based on the results of interviews with plasma representatives, there were no complaints in the last 1 year.

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; and 5.2.5

Based on document review, field observation, and interviews with staff and management, it is known that RHS POM does not purchase FFB from third parties/ FFB suppliers. RHS POM only accepts FFB from own estate, plasma, and plantations from the group as described in indicator 2.3.1. based on this explanation, this indicator does not apply to Rimba Harapan Sakti POM for the period 2022.

5.2.4

When the audit was carried out, the certification unit had collaborated with the smallholder scheme (*Koperasi Makmur Sejahtera*) since 2017 and until now the overall operational activities were carried out by PT RHS. All workers who work at Plasma are PT RHS's workers so that pesticide handler training is only provided to company workers, not to smallholder schemes. For training that has been carried out is the Integrated Pest Management Training (including pesticide handling) on 26 August 2022 22 which was attended by 22 participants.

Based on the results of interviews with pesticide applicators at RHS 1 and RHS 2 estate, it is known that workers have received routine training every year by the certification unit and during field visits the workers have applied good and correct use of pesticides according to the procedures owned.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1-6.1.2

The company presented a review of its equal employment opportunity policy in January 2018, explaining that Wilmar International is committed to providing equal employment opportunity to every employee. Our beliefs and labor standards affirm that we will not discriminate when making decisions about employees, promotions or retirement jobs/candidates based on race, color, sex, age, social class, religion, sexual orientation, politics, or simply disability subject to on the conditions attached to the role to be performed.

The Company also shows the Minutes of Policy Socialization on May 24, 2022 which discusses the OHS Policy, Child Protection Policy, Sexual Harassment Policy, Communication Policy, Corporate Social Responsibility Policy, Environmental Policy, Equal Opportunity Policy, Whistleblowing Policy, Freedom of Association Policy, Policy Reproductive rights, human rights policies and company procedures were attended by 58 participants from internal and external parties.

Based on the verification of labor register documents and interviews with representatives of workers through bipartite cooperation institutions, it is known that these workers come from various regions such as Java, Flores, Sulawesi and others. From the results of interviews with bipartite representatives and workers, it is known that there is no indication of discrimination against workers. In addition, from interviews with village representatives, information was obtained that there was no indication of discrimination. The company has provided equal opportunities for the surrounding community to find work.

6.1.3

The company has kept track records of employees such as job applications, CVs, photocopies of ID cards, and supporting documents such as diplomas, transcripts, etc., for example on behalf of the initials SS who worked at RHS 1 who had previously submitted an

application letter and administrative documents, thereafter, prospective employees will take part in a medical examination and the signing of a work agreement on March 4, 2022.

The company has demonstrated a record of the implementation of employment procedures, for example :

Promotion

Decree No. 2566/HRGA-SK/XII/2021 dated December 31, 2021 regarding employee promotion, namely from Administration Jr Staff to Admin Staff and from group 3A to 3B and the results of the assessment/performance with the result that they can be promoted to Admin Staff.

Employee assessment

Periodic employee assessment is carried out by the company with the aim of evaluating employees as well as increasing the class and wages given to employees. The last employee assessment was carried out for the 2021 period, for example, with the initials S who served in the water treatment plant section, he received an assessment of 62% with category B. In this assessment, the components assessed were work results and work behavior.

The results of interviews with workers and representatives of bipartite cooperation institutions revealed that employment procedures have been carried out by the company in accordance with applicable regulations. They also know that workers already know about work procedures such as termination, retirement or promotion. Based on the interview, it is known that there is no discrimination against workers. The company has provided employee rights in accordance with company regulations and applicable regulations.

6.1.4

Based on interviews with female workers in estates and mills as well as WOW, it was stated that pregnancy tests were only carried out for pesticide applicators to prevent workers from being exposed to pesticides. It was further explained that so far there had never been a pregnancy test which was a discriminatory act.

6.1.5

The company already has a women's committee called WOW (Woman of Working Group) to deal with issues such as harassment to employees, domestic violence and others. The WOW organizational structure consists of advisors, coaches, chairpersons, vice chairmen, secretaries, treasurers and members consisting of men and women. The WOW organization also has work programs, for example:

- Routine activities such as group sports and immunizations.
- Activities in daycare such as outreach to children about abuse.
- Economic activities such as bazaars and competitions.
- Training such as handicraft training.
- Socialization such as sexual harassment and waste sorting.
- Celebrations such as OHS Day and Kartini Day.

The company also shows the realization of the program, for example, as stated in the Minutes No. 049/WOWRHS/VIII/2022 dated 27 August 2022 regarding activities with children at the daycare, make-up tutorials and regular member meetings.

The results of interviews with female workers such as spraying workers, fertilizer workers, and daycare workers, it is known that the workers already know the WOW organization and its functions. Workers also know WOW representatives if there are complaints or complaints related to women's problems or issues. The results of interviews with representatives of women's committees and women workers, it was found that there were no complaints related to women's issues in the last 1 year.

6.1.6

The wages applied in the company are in accordance with the Central Kalimantan Governor's Decree Number 188.44/445/2021 dated November 30, 2021, which is Rp. 3,317,675 or daily wages of Rp. 132,707.

The company shows IOM No. 010/HRD-RO/IOM/III/2022 regarding salary scales for employees in groups 2A, 2B, 2C and 2D, for example for group 2A (0 years working period) of Rp. 3,317,700, class 2B of Rp. 3,393,000, class 2C. amounting to Rp. 3,648,000 and the 2D group of Rp. 3,932,000.

The results of the verification of workers' wages, for example the RHS-1 loader operator with the initials YS and LM, it is known that the company has given the same wages for the same scope of work, namely Rp. 3,317,700.

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 a Company Regulation for the period 2021 – 2023 which has been ratified through the Decree of the Head of the Manpower and Transmigration Office of Seruyan Regency No. 560/510/Disnakertrans/VI/2021 concerning the Ratification of Company Regulations dated June 4, 2021. The company regulations explain employment relations, leave and absence from work, wages, employee welfare & social security, transfers, sanctions, termination of employment, complaints and etc.

The company displays a list of the number of workers for August 2022, namely RHS 1 with 795 workers, Factory with 105 workers and RHS 2 with 628 workers. The number of contractor workers such as CV Randu Mas is 33 workers.

In addition, the company also showed a trial period agreement No. 5203/RHS1/SPK/H/II/2022 dated 20 July 2022 for loader work. The agreement has explained several terms of work, rights and obligations of workers and others. For example, workers' responsibilities, wages, leave, social security and others. The agreement has been signed by both parties. From the results of interviews with workers and representatives of workers through Bipartite cooperation, it is known that the company has provided a copy of the agreement to the workers. From the results of the interview, it is also known that the company has provided socialization related to company regulations to workers.

Based on document verification, field observations, interviews with workers (harvest workers, fertilizer workers, mill workers, etc.), it was found that there was no indication of forced labor and had received wages above the district minimum wage.

6.2.2 & 6.2.3

Wage Determination

- Inter Office Memo No. 010/HRD-RO/IOM/III/2022 regarding the salary scale for employees of class 2A, 2B, 2C and 2D which determines wages for each group in accordance with the Seruyan District Minimum Wage in 2022, for example for Group 2B of IDR 3,393,000 valid on January 1, 2022.
- Based on a review of documents in the form of payslips for July and August 2022 on one of the personnel in the water treatment plant (Group 2 B), it was found that the basic wage paid was Rp. 3,383,000, so there was a difference/underpayment of Rp. 10,000 in accordance with company regulations.
- Corrections have been made by showing the Minutes of the Employee Salary Rapel due to the difference in the 2022 wage scale with the actual basic salary of the employees from January to August 2022. However, it is not yet certain whether the error occurred only in one worker. Besides that, no plans have been shown to ensure that something similar doesn't happen again in the future.

Overtime Implementation

- PT Rimba Harapan Sakti's company regulations for the period 2021-2023, among others, explain the following:
 - Article 6 point 1 explains that overtime work is doing work that is ordered or asked by the company to be done by employees outside of 7 hours of work from Monday to Friday and 5 hours of work on Saturdays.
 - Article 6 point 4 explains that the hourly overtime pay is 1/173 times the monthly wage.
 - Article 6 point 7 stipulates the calculation of overtime, namely on normal working days, for the first overtime hour it is multiplied by 1.5 and the second overtime hour and so on is multiplied by 2. As for overtime on Sundays, the overtime pay paid in the first hour until the seventh hour is multiplied 2, for the eighth hour multiplied by 3 and for the ninth and tenth hours it will be multiplied by 4 hours.
- Work agreement No 012/RHS2/SPK/H/X/2019 regarding personnel work agreements as generator operators, regulated working hours, namely:
 - Monday to Saturday working 03.00 – 05.00 WIB and 17.00 – 22.00 WIB (7 working hours).
 - Sundays at 03.00 – 05.00 WIB, 08.00 – 12.00 and 17.00 – 22.00 WIB (11 working hours).
 - For the shortest working day, the salary paid is the same as the usual effective day
 - Especially on Sundays, overtime is paid up to a maximum of 4 hours according to the agreement

- Based on a review of documents in the form of details of overtime calculations for personnel as operators in July and August 2022, the following were found:

DATE	FROM THE DOCUMENT PROVIDED		TOTAL	ACCORDING TO CALCULATIONS IN COMPANY REGULATIONS		TOTAL	DIFFERENCE
	WAGES BASIC	OVERTIME		WAGES BASIC	OVERTIME		
Saturday, 9 July 2022	132.708	-	132.708	132.708	67.121	199.829	- 67.121
Sunday, 9 July 2022	-	156.194	156.194	-	556.142	556.142	- 399.948
Saturday, 5 August 2022	132.708	-	132.708	132.708	67.121	199.829	- 67.121
Sunday, 6 August 2022	-	156.194	156.194	-	556.142	556.142	- 399.948

From the data sample, it was found that there was over time that was not paid on short days/ Saturdays and underpaid over time on holidays/ Sundays.

- Company Regulations for the period 2021 – 2023 article 45 point 3 states: If there are things or work requirements in this company regulation that are lacking or contrary to the provisions of the applicable laws and regulations, the provisions of the applicable laws and regulations will apply (References to the Company Regulations include is the job creation law and government regulation 35 of 2021)

The company has not been able to show sufficient evidence that the implementation of wages and overtime payments has fully complied with the published provisions. (NCR No 2022.01)

6.2.4

The results of field observations in housing areas and interviews with workers and bipartite cooperation, it is known that the company has provided housing facilities and infrastructure and facilities that are decent/in good condition to workers such as houses, clean water facilities, worship facilities, sports, school buses, ambulances, clinics and others. The condition of the house is permanent and has good sanitation. From observations, it is also known that in each housing location there are child care areas, trash cans, generator rooms/houses (to provide electricity), drilled wells, water treatment plant (for drinking water sources) and etc.

6.2.5

The results of interviews with employees and worker representatives (Bipartite), it is known that there are workers or residents of housing who sell necessities. In addition, there are also food vendors who enter the residential area on a regular basis. Based on interviews, it is also known that workers do not experience difficulties in getting sufficient and proper food.

6.2.6

Wage determination at PT RHS is based on the minimum wage in Seruyan Regency based on Central Kalimantan Governor Decree Number 188.44/445/2021 dated November 30, 2021 which stipulates the Seruyan Regency minimum wage in 2022 at IDR 3,317,667.50. Related to this, the company also issued an Inter Office Memo from the General Manager to all Managers with No. 177/HRD-RO/IOM/XII/2021 dated December 1, 2021 regarding the Seruyan Regency Minimum Wage in 2022 of Rp. 3,317,675 or daily wage of Rp. 132,707 effective January 1, 2022.

In relation to the DLW (Wage Worth Living), the company has assessed the wages paid in accordance with the Seruyan Regency minimum wage and has also assessed the in-kind benefits provided, which include housing costs, water, electricity for homes, health facilities, schools. for children of workers, with the following details:

- Lifetime House for 30 years
- House Tax
- Maintenance Fee
- Electricity Usage Fee
- Water usage fee
- Bus Fee
- Child Care Fee
- Tuition Fee
- Health Fee
- Entertainment Fee

The total monthly In-Kind Benefit revenue is IDR 1,757,340, the total prevailing wage per month is IDR 5,351,488 (district minimum wage + In-Kind Benefit + THR every year).

6.2.7

The results of the verification of labor register documents, work agreement documents, interviews with representatives of Bipartite, workers, Manpower Office and field observations, it is known that there are no casual daily workers or contract workers but only permanent workers at PT RHS.

6.2.2

Status: Nonconformity

6.3

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

6.3.1; 6.3.2; 6.3.3

The company had a revised union policy in November 2019, which explains:

- Wilmar is committed to upholding the right to freedom of movement and the right to resign from work.
- Uphold workers' rights to freedom of association, collective bargaining, and to form and join trade unions of their choice.
- Ensure ethical recruitment so that workers are not charged any recruitment fees at any stage.

The company has provided socialization related to company policies including certification policies, for example those listed in the minutes of policy socialization on 24 May 2022 which discusses OHS Policy, Child Protection Policy, Sexual Harassment Policy, Communication Policy, Corporate Social Responsibility Policy, Environmental Policy, Equal Opportunity Policy, Whistleblowing Policy, Freedom of Association Policy, Reproductive Rights Policy, Human Rights Policy and company procedures followed by 58 participants from internal and external parties.

The results of interviews with workers such as harvesters, spray workers, fertilizer workers, factory workers and others, it is known that the company has provided socialization related to freedom of association. From the results of interviews with workers, it is known that organizations related to workers' complaints are assigned to Bipartite cooperation institutions, for example for RHS POM through the Decree of the Head of the Manpower and Transmigration Office of Seruyan Regency No. 560/840/Disnakertrans/2021 October 2021 concerning Registration of PT RHS POM Bipartite Cooperation Structure.

The Bipartite Cooperation Institute regularly holds monthly meetings, the last time being for example on 7 June 2022 regarding supervision of work discipline violations attended by company representatives and workers representatives. In addition, the minutes of each meeting will be compiled every semester to be reported to the relevant agencies.

Based on interviews with bipartite representatives, it was found that there was no intervention related to the selection of workers' representatives or in the implementation of any activities.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1; 6.4.2; 6.4.4

Wilmar international has a Non-Deforestation, Peat and Exploitation (NDPE) Policy dated 15 December 2013 and revised in November 2019. It states: "Other Wilmar policies that support our human rights values and commitments are the Human Rights Framework, Child Protection Policy, Occupational Health and Safety Policy, Equal Opportunity Policy, and Sexual Harassment, Violence and Harassment Policy, and Reproductive Rights, Whistleblowing Policy and the Women's Charter".

The company has provided socialization related to company policies including certification policies, for example those listed in the minutes of policy socialization on 24 May 2022 which discusses OHS Policy, Child Protection Policy, Sexual Harassment Policy, Communication Policy, Corporate Social Responsibility Policy, Environmental Policy, Equal Opportunity Policy, Whistleblowing Policy, Freedom of Association Policy, Reproductive Rights Policy, Human Rights Policy and company procedures attended by 58 participants from internal and external parties.

The company has also shown agreement with contractors that have explained the prohibition of employing children under 18 years old,

forced labor and workers from human trafficking, for example agreement no. C&A1608.15/2022/RHS1-640 dated May 4, 2022.

The results of the verification of labor register documents, interviews with internal and external stakeholders, and field observations revealed that there were no indications of workers under the age of 18. In addition, the results of field observations in the office, housing and operational areas of the company also revealed that there were signs prohibiting the use of child labor.

6.4.3

Based on the document review, it is known that there are students who practice field work, for example as indicated by a cover letter for internship students on July 16, 2022 who practice from January 18, 2022 – July 18 2022. Based on interviews with management representatives, it was stated that students who practiced field work more often carry out administrative data collection activities. In addition, students are first informed about areas/activities that have the potential to be high risk and in the field review, students are accompanied by staff or company employees.

Status: Comply

6.5

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

6.5.1; 6.5.2

Wilmar international has a Non-Deforestation, Peat and Exploitation (NDPE) Policy dated 15 December 2013 and revised in November 2019. It states: "Other Wilmar policies that support our human rights values and commitments (i.e. Human Rights Framework, Child Protection Policy) , Occupational Health and Safety Policy, Equal Opportunity Policy, and Sexual Harassment, Violence and Harassment Policy, and Reproductive Rights, Whistleblowing Policy and the Women's Charter".

The company has provided socialization related to company policies including certification policies, for example those listed in the minutes of policy socialization on 24 May 2022 which discusses OHS Policy, Child Protection Policy, Sexual Harassment Policy, Communication Policy, Corporate Social Responsibility Policy, Environmental Policy, Equal Opportunity Policy, Whistleblowing Policy, Freedom of Association Policy, Reproductive Rights Policy, Human Rights Policy and company procedures followed by 58 participants from internal and external parties.

The results of interviews with workers, especially female workers, revealed that the company had provided socialization related to policies on preventing sexual harassment and violence as well as protecting reproductive rights. The company also has a committee called the Woman of Working Group (WOW) to deal with issues or problems of sexual harassment and violence.

The results of interviews with committee representatives and workers stated that there were no cases of violence or sexual harassment in the last 1 year. In addition, from the interviews, it is known that the company has given permission/maternity leave, menstrual leave and breastfeeding permission for female workers.

6.5.3

The company has identified the needs of new mothers, which will be held on July 14-22, 2022. As a follow-up to these activities, the company has made a plan of activities, including the following:

- Discussion about the right time for young mothers who are given permission to breastfeed.
- Disseminate memos about breastfeeding provisions to mothers.

The results of interviews with female workers and representatives of the WOW committee, it was stated that the company had given permission or time for mothers to breastfeed.

6.5.4

The company also has a Complaint Procedure on the Application of Wilmar's No Deforestation, No Peat, No Exploitation (NDPE) Policy update version 2.0 June 2019. At point 4 in the document it is explained about the Protection of Human Rights Defenders, Whistleblowers, Complainants and Community Spokespersons as well as complaints cases that can investigated through external mechanisms such as the RSPO complaints procedure.

The results of interviews with workers and representatives of bipartite cooperation institutions, it is known that workers understand the complaint mechanism which can also be submitted to bipartite representatives. From the interviews, it was stated that workers' complaints were usually related to home improvement complaints and had been followed up by the company.

Status: Comply

6.6
No forms of forced or trafficked labour are used.
6.6.1; 6.6.2

The results of the verification of labor register documents, work agreement documents, interviews with Bipartite cooperation, workers, Manpower Office and field observations, it is known that there are no casual daily workers or contract workers, but only permanent workers at PT RHS. From the results of interviews with workers, it is known that there is no forced labor in the company. All workers who work in accordance with the agreement or appointment letter that has been mutually agreed upon.

The company also shows a trial agreement letter, for example No. 5203/RHS1/SPK/H/VII/2022 dated July 20, 2022. The agreement has explained several terms of work, rights and obligations of workers and others. For example responsibilities, wages, leave, social security and others. The agreement has been signed by both parties. From the results of interviews with workers and representatives of workers through Bipartite cooperation, it is known that the company has provided a copy of the agreement to the workers.

Status: Comply

6.7
The unit of certification ensures that the working environment under its control is safe and without undue risk to health.
6.7.1

The company has formed an OHS organization which is manifested in the form of P2K3 referring to the Decree of the Head of the Central Kalimantan Province Manpower Office:

- Palm Oil Mill: Number KEP.250/DISNAKERTRANS/VIII/2022 concerning Ratification of the Committee of Occupational Health and Safety (P2K3) PT Rimba Harapan Sakti POM dated August 09, 2022 with Bayu Arga Giantino as a secretary. P2K3 Secretary a.n. Bayu Arga Giantino is an OHS General Expert who has received certification from the Indonesian Ministry of Manpower Number Reg 63617/PK3/AJ/2018/P0 dated December 31, 2018 valid for 3 years. However, based on verification document it was known that the SKP for OHS General Expert is still on process. The company has the opportunity to confirm the process of extending the Certificate of Appointment of General OHS Expert on behalf of Bayu Argo Giantino, which is still in process at the Ministry of Manpower of the Republic of Indonesia. OFI
- Estate: The company shows the application for approval of the P2K3 Organizational Structure, TPKD & Fire Fighting PT RHS – Estate to the Manpower and Transmigration Office of Kalimantan Tengah Province, dated August 29, 2022, which was received on August 30, 2022. The company has the opportunity to ensure the process of ratifying the OHS Committee Organizational Structure, Regional Fire Control Team & Fire Fighting PT RHS – Estate by the Department of Manpower and Transmigration of Central Kalimantan Province. OFI.

Companies can show regular meeting activities, including the Minutes of the Monthly P2K3 Meeting of PT RHS POM, dated June 25, 2022, with discussions covering EHS Training, Housekeeping inspection and Safety, emergency equipment evaluation (Hydrant, first aid boxes and APAR) reviews.

6.7.2

Emergency response procedures are available, including those listed in SOP 02/EHS/(5)/0622, Revision 5, issue date of June 2022 and work accident procedures, including those listed in SOP 05/EHS/(4)/0921, Revision 4, date of issue September 2021, in Indonesian which is clearly understood by all workers.

There are workers assigned to the field and other work locations and have received First Aid training in Accidents (P3K), the Company already has a First Aid Officer in the workplace who is licensed and still valid, for example:

1. RHS Estate-1 has 7 licensed first aid workers, for example on behalf of Ulfatul Hasanah license number 560/105/UPT-BPKS/P3K/VII/2022, valid until July 1, 2025.
2. RHS Estate-2 has 6 licensed first aid workers, for example on behalf of Sutarno license number 560/108/UPT-BPKS/P3K/VII/2022, valid until July 1, 2025.

First aid kits are available in the workplace, for example, as shown in the PT RHS – POM Emergency Facilities & Infrastructure Equipment List, updated August 8, 2022, which explains the availability of 74 fire extinguishers, 13 hydrants, 2 gathering points, 3 alarms, 3 safety showers, room First aid kit and 8 first aid kits, spill kit, 1 clinic, 1 ambulance and 3 oxygen cylinders.

Based on the results of field observations at the mill and estate, it is known that there are evacuation routes that are installed, for

example in the mil area found in the mill office area, in the process station area (eg engine room, boiler, etc.) and in the estate area for example in the estate office.

Based on the results of field observations and interviews with workers, for example in the harvest area of Block 048 Division IA and Block 028 Division 1B RHS-1 Estate and spraying in Block 123 Division 1A RHS-2 Estate, it is known that there are foremen who are equipped with first aid facilities and have received first aid training from licensed first aid workers and medical personnel.

In addition, First Aid facilities are also routinely monitored, where there is a monitoring form that is filled in if there is use and a checklist of completeness of contents every month in accordance with Regulation of The Minister of Manpower And Transmigration number 15 of 2008.

6.7.3

The company has procedures related to Personal Protective Equipment contained in document No. SOP 03/EHS/(6)/0921 which has been revised 6 times and the latest document has been approved by the General Manager. This procedure is related to the management of personal protective equipment in mill and plantation operations in the Wilmar Group Indonesia – Central Kalimantan Project area. In general, this procedure describes the identification of the need for PPE, the mechanism for providing and replacing PPE as well as the maintenance, monitoring and evaluation of the suitability of PPE.

Based on the results of field observations at the estate and mill, it is known that workers have used Personal Protective Equipment (PPE) in accordance with the PPE Matrix and PPE SOPs, such as for harvest workers using boots, gloves, goggles and helmets, spray workers using aprons, masks carbon, goggles, rubber gloves and boots and factory workers use safety shoes, ear plugs/ ear muffs and masks.

Based on the results of interviews with workers in both estates and mills, it is known that PPE is provided free of charge to all workers in the workplace. Meanwhile, if the employee damages intentionally/lost due to the negligence of the worker, the worker must replace it according to the specifications that have been set.

Based on the results of field observations, for example in the RHS Estate-II housing block E54 and block K72, it is known that the company has provided sanitation facilities for herbicide and fertilizer applicators, which function so that workers who use pesticides and chemicals such as fertilizers can remove PPE, clean themselves and wearing personal clothes.

Based on the results of field observation, for example in the chemical warehouse/ warehousing area, it is known that there is an MSDS installed in the warehouse area.

6.7.4

Based on the results of interviews with workers by sampling both in estates and in mills, it is known that workers have been included in BPJS Health and BPJS Employment. For example, the results of interviews with maintenance workers and harvesters at the estate, workers stated as evidence that BPJS had been included, namely by having a BPJS membership card both for themselves and for their dependents (for BPJS Health).

Based on the results of field observations and interviews at the RHS Estate-II Workshop, it is known that there was a work accident that occurred on August 2, 2022 on behalf of LOR (initial). The company shows:

1. Work Accident Report on behalf of LOR via email to BPJS Employment and *UPT Balai Wasnaker* on August 4, 2022.
2. Work Accident Report Document, number FRM 02/SOP 55/HRD/(0)/0810, which explains work accident information, victim identity data, victim's close family data, accident data, chronology of events, picture of incident flow, date August 2, 2022.
3. Minutes of Work Accident, dated August 2, 2022, which explains the identity of the victim, chronology of events and is signed by the Direct Supervisor.
4. Work Accident Case Report Phase I (Form 3 KK 1 BPJS Employment), dated August 8, 2022.
5. BPJS Employment membership card and ID card in the name of LOR (initial)

All workers are provided with health services and are covered by occupational accident insurance. This is evidenced in the following documents:

RHS-1
BPJS of Employment

- Details of the Employment Social Insurance RHS-1 Estate Labor Contribution for the July 2022 reporting period, which explains the total workforce of 722 people.
Payment status "PAID" on August 15, 2022, with the contribution code 400000145663, the number of workers is 722 with guarantee programs namely JKK, JHT, JKM and Pension Guarantees, so the total contribution is Rp. 230,361,648,-.
Recapitulation of Payment Details for Form 2 PU BPJS Employment RHS-1 Estate dues for July 2022, which explains the number of 722 workers with guarantee programs namely JKK, JHT, JKM and Pension Guarantees, so that the total contribution is Rp. 230,361,648,-.
- Details of the Health Social Insurance RHS-1 Estate Labor Contribution for the June 2022 reporting period, which explains the total workforce of 712 people.
Payment status "PAID" on July 15, 2022, with the contribution code 400000145663, the number of workers is 712 with guarantee programs namely JKK, JHT, JKM and Pension Guarantees, so the total contribution is Rp. 227,328,529,-.
Recapitulation of Payment Details for Form 2 PU BPJS Employment RHS-1 Estate contributions for June 2022, which explains the number of 712 workers with guarantee programs namely JKK, JHT, JKM and Pension Guarantees, so that the total contribution is Rp. 227,328,529,-.

Based on the results of document reviews and interviews with workers in the field, for example at RHS-2 Estate and RHS POM, it is known that all workers have been enrolled in the Employment Social Insurance and Health Social Insurance programs.

6.7.5

The company shows the PT RHS – POM Work Accident Board document for 2021 and 2022, which explains that until August 2022 there have been no work accidents.

The company also shows the *Panitia Pembina Keselamatan dan Kesehatan Kerja* Report for the Second Quarter of 2022 (POM and estate), which also discusses the Recapitulation of Work Accidents. Based on the report, it is known that there were no work accidents until the 2nd quarter of 2022.

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

Documented IPM plans are listed in SOP Agronomy Detection and Census of Palm Oil Pests and Diseases, document number SA 02/EMU/(3)/1021, Revision 2, October 2021, which among other things explains pest and disease types, pest control thresholds and diseases, methods of taking samples at the time of detection or enumeration, as well as recommendations for control. This procedure explains that pest detection activities are carried out once every one or two months. In addition, it also describes the activities of planting beneficial plants, reporting and documentation.

The unit of certification also demonstrates documentation of implementation and monitoring to ensure effective pest control, which includes:

- PT RHS IA's Palm Leaf Feeding Caterpillar Census Form, block 037, dated 07 June 2022, which explains the results of the census showing the attack rate of *Metisa plana* bagworm is above the threshold (5 tails per midrib) which is 7.12 individuals per midrib. So it was decided to do chemical control.
- PT RHS IA's Palm Leaf Feeding Caterpillar Census Form, block 038, dated June 10, 2022, which explains the results of the census showing the attack rate of *Metisa plana* bagworm is above the threshold (5 individuals per midrib) which is 8.29 individuals per midrib. So it was decided to do chemical control.
- Monitoring Data on Control of Palm Leaf Feeding Caterpillar RHS 1 Power Drill for July – August 2022, which describes control by injection using Chepate chemicals. Based on the document, it is known that the control carried out on block 037 on 23, 25 and 26

July 2022 used Chepate.

7.1.2

The unit of certification uses the species mentioned in Permen LHK No.P. 94/MENLHK/SEKJEN/KUM.1/12/2016 concerning Invasive Types. This is based on the documents shown, such as the Progress of Beneficial Plant Planting as PT RHS IPM Program in July and August 2022. For example, in RHS I Division II, it was explained that *Turnera subulate* and *Turnera ulmifolia* have been planted in Fields 086 and 088 covering an area of 31 hectares. during June 2022. In addition, at RHS I Division IIA, it was explained that *Turnera subulate* and *Turnera ulmifolia* have been planted in Fields 090, 091, 092 and 088 covering an area of 72 Ha during August 2022.

The unit of certification also uses the *Tyto alba* species for biological control of rat pests. This was shown, among others, during field observations in RHS 1 and RHS 2.

7.1.3

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

Status: Comply

7.2

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

7.2.1

The company has a list of types of pesticides issued by the Office of Manpower and Transmigration of Central Kalimantan Province No. 560/ 31/PK.12/Disnakertrans/VIII/2021 regarding Recommendations for Use of Pesticides in the Workplace dated August 24, 2021 which explains that PT RHS is recommended for 41 types of pesticides, including Garlon 670 EC, Basta 150 WSC, Inteam 150 SL, Petrokum 0.005RB , Decis 25 EC, Regent 50 SC, Agrimec 18 EC, Score 250 EC, Antracol 70 WP, Dithane M-45 80 WP, Abolisi 865 SL, Topsin 500SC, Chepate 75 SP period 25 August 2021– 25 August 2022. Approved by the Head Service.

The company shows the 2022 Pesticide List, updated 28 January 2022, which stipulates 4 rodenticides, 17 insecticides, 14 herbicides and 9 fungicides along with the brand, active ingredient, pesticide class, nature, form, target, manufacturer and registration number and validity period.

For example, Tiara 20 WG brand herbicide, active ingredient Methyl Metsulfuron, pesticide class III, systemic properties, granular form, target broadleaf weeds, RI registration number 01030120124525 and validity period until February 2, 2023.

7.2.2

There is a record of pesticide use (including the active ingredient used and the LD50 of the active ingredient, the treatment area, the amount of use of the active ingredient per Ha and the number of applications), which is listed in the 2022 Analysis of Active Ingredients Per Ha, which explains the name of the type of agrochemical, name Active ingredients, LD50-Oral, LD 50-Dermal, LC 50-Inhalation, content %, density and usage per month.

7.2.3

The company has a Willmar Policy released on 5 December 2019 stating that "Pesticides categorized as World Health Organization Class 1A or 1B, or those listed in the Stockholm or Rotterdam Conventions, are prohibited except in an emergency. The use of paraquat is prohibited."

The company has a program to reduce pesticide use (which is regulated in the Agronomy SOP) by replacing pesticides with biological controls such as using natural predators to control rats and planting beneficial plants. Based on document review and field observations, several IPM programs with biological approaches have been implemented, such as controlling rats with *Tyto alba* and controlling oil palm leaf-eating caterpillars by planting beneficial plants such as *Turnera subulate*, *Turnera ulmifolia* and *Casia cobanensis*. In addition, the company has also carried out routine early detection which is listed in the monthly report of the early warning system.

Based on document review and field observations to pesticide storage areas at PT RHS 1 Estate and RHS 2 Estate, it is known that the company does not use pesticides classified as WHO 1A or 1B.

7.2.4

There is no preventive use of pesticides for the prevention of pests and diseases (prophylactic use). This is evidenced, among others, by the selection of special materials used or not by the company, which are listed in the 2022 Pesticide List and Recommendations for Use of Pesticides in the Workplace document. For example, pesticides with the active ingredient *Isopropyl Amina Glyphosate*, target broad-leaved weeds such as *Mikania michrantha* and narrow-leaved weeds such as *Axonopus compressus* and *alang-alang* (*Imperata cylindrica*).

The company continues to minimize the use of pesticides as part of the plan according to the IPM plan. The use of pesticides is not preventive for disease prevention (prophylactic use), but based on census results that exceed the specified threshold value.

As an example of the company's efforts, the company is trying to develop owls (*Tyto alba*) as natural enemies of rat pests. In addition, in an effort to reduce the use of pesticides to control caterpillar pests by developing useful plants such as *Turnera subulate* and *Turnera ulmifolia*. Based on the results of field observations at RHS I and RHS II Estate, it was found that *Turnera subulate* plantings were very well developed and well maintained as a form of controlling nettle caterpillars and bagworms.

7.2.5

The unit of certification does not use pesticides registered in the World Health Organization (WHO) Class 1A or 1B or included in the Stockholm or Rotterdam Conventions and paraquat. This is evidenced by PT RHS's 2021 and 2022 Active Ingredient Usage Analysis document which among other things explains the amount of pesticide use and the amount of active ingredient used during 2021 and 2021 where there is no use of pesticides included in the Class 1A or 1B list of the Health Organization. World (WHO) or included in the Stockholm or Rotterdam Conventions and paraquat. In addition, based on the field visit to the pesticide storage warehouse did not find any pesticides with the active ingredient paraquat.

7.2.6

The company has SOPs for handling chemicals/pesticide, which include the following documents:

- Agrochemical Spray Equipment Calibration Procedure, document number SA 06/EMU/(1)/1021, Revision 0, October 2021.
- Spraying & Fumigation Procedure, PSKK document number 02/CKP/(2)/1111, Revision 2, November 2021.
- Mixing of Agrochemical Ingredients, PSKK document number 09/CKP/(2)/0320, Revision 2, March 2020.
- Procedure for Pesticide Storage, document number SOP 17/EHS/(1)/0518, Revision 1, May 2018.
- And others

Pesticides are handled, used or applied only by persons who have completed the required training. This is proven based on the results of field observations and interviews with pesticide applicators in Block 123 Division 1A RHS-2 Estate, it is known that workers understand procedures and can practice using pesticides according to company procedures. In addition, pesticide applicators can also demonstrate an understanding of the hazards and risks associated with the chemicals used, such as knowing the function of the PPE provided, how to apply pesticides safely, namely by not going against the wind when applying pesticides. Workers and foremen also explain that appropriate PPE is provided and used and can be easily replaced if damaged.

Pesticides are always used according to the product label, such as PPE recommendations that must be used according to the product label. Safety Data Sheets for the pesticides used are available, including those posted in the chemical storage warehouse.

The PPE used is in accordance with the recommendations for the risk assessment carried out.

Regarding all warning information affixed to the product, such as advice on the use of the type of PPE in accordance with the MSDS, it is known that the company has provided PPE such as masks in accordance with the specified MSDS. Based on the results of interviews with herbicide applicators, it was also known that workers had understood the MSDS that had been socialized.

Pesticide applications are handled, used or applied by workers who have received training. This is shown in the recording of the training and socialization activities carried out. Here are a few examples of Minutes of Refreshment Pest and Disease Training, dated July 8, 2022 at block 003 PT RHS 1, which was attended by 15 participants.

7.2.7

Based on field observations at the agrochemical warehouses of RHS 1 Estate and RHS 2 Estate, it is known that the storage of all pesticides is in accordance with recognized best practices, which refers to PP. 74 of 2001 concerning Management of Hazardous and Toxic Materials. Based on the results of these field observations, it can be explained that the storage area has been equipped with

hazardous and toxic material symbols, material safety data sheet, ventilation, channels to accommodate pesticide spills, eyewash and showers, fire extinguishers, first aid kits, emergency handling flows, racks according to packaging and others.

7.2.8

The company can show the SOP for pesticide storage SOP number 17/EHS/(1)/0518 revision 1, effective May 2018 . The SOP describes the mechanism for storing pesticides in a special warehouse, including a place for mixing pesticide ingredients to be used in the field in a special isolated place so that there is no potential for chemical exposure to outside the warehouse. Storage of used pesticide packaging is stored in a temporary storage area for Hazardous Waste and then sent to a licensed collector.

Based on field visits to pesticide warehouses and temporary storage areas for Hazardous Waste RHS 1 and RHS 2, it is known that pesticide storage areas are well managed, oil traps are available, adequate and isolated air ducts so that there is no potential for exposure to pesticide materials from leaving the warehouse. Pesticide waste such as used pesticide packaging which is classified as Hazardous Waste is also found stored in a well-monitored temporary storage warehouse for Hazardous Waste which is then collected to licensed collectors. Before being stored in the Hazardous Waste Warehouse, used pesticide packaging in the form of jerry cans is chopped first, this is done by management to avoid reusing pesticide packaging and make storage space efficient.

The company also shows the SOP for washing used packaging, contaminated personal protective equipment and the management of used washing and rinsing water. No. document SOP 51/EHS/(1)/0320 revision 1 dated 27 March 2020. Based on interviews with employees and foremen of pesticide application at RHS 1 and RHS 2, it is known that all used pesticide packaging containers were returned and sent to the Hazardous Waste Warehouse and 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. Thus, no contaminated items are taken home. The results of observations in employee housing estates revealed that it was not found that used pesticide packages were disposed of in landfills and were not used for other purposes such as trash cans, flower pots and so on.

7.2.9

Based on the results of document review, interviews with management and field visit, it was found that the certification unit did not spray pesticides through the air.

7.2.10

The certification unit also shows a record of the results of the annual special medical examination for pesticide operators and documented evidence for the follow-up to the results of the examination, which among others are shown the Minutes of Special Periodic Medical Check Ups (cholinesterase examination) semester 1 2022, 10 – 11 March 2022, with participants 98 worker from RHS 1 Estate and 75 worker from RHS 2 Estate.

Based on the results of the examination carried out, it was found that all employees showed normal cholinesterase activity in the blood and were declared fit for work.

7.2.11

Based on the results of field observations on herbicide application activities at RHS 1 and RHS 2 Estate, it was found that none of the female herbicide applicators were pregnant or breastfeeding, or people with medical limitations.

Based on the results of interviews with herbicide applicators, for example at RHS 1 Estate, it is known that the company carries out pregnancy monitoring for female herbicide applicators. Based on the results of interviews with the women's committee, the same thing was also stated.

Status: Comply

7.3

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

7.3.1

Company has identified the waste contained in the Waste Identification and Waste Management Plan PT RHS 2021 documents that made by each Estate and POM. The identification is grouped by activities that produce waste, waste name, waste code, solid or liquid type, and its management. Determination of the waste code based on applicable regulation and stored in a hazardous and toxic waste warehouse that has a permit Number 503/977/DPMPTSP/XII/2019 dated December 17, 2019 and is valid for 5 years from the date of ratification. The company has 6 locations of hazardous and toxic waste warehouses contained in the permit, namely:

Name and Location	Coordinate	
	S	E
RHS 1 Solid Hazardous Storage	02° 46' 73.0"	112° 34' 23.2"
RHS 1 Liquid Hazardous Storage	02° 46' 71.7"	112° 34' 28.2"
RHS 1 Medical Waste Storage	02° 46' 66.8"	112° 34' 27.0"
RHS 2 Solid Hazardous Storage	02° 48' 20.4"	112° 39' 16.7"
RHS 2 Liquid Hazardous Storage	02° 48' 19.8"	112° 39' 20.3"
RHS POM for Solid and Liquid	02° 50' 11.1"	112° 34' 22.3"

The certification unit also has procedures for managing waste generated by the company, including:

- SOP for Management of Hazardous and Toxic Material and Waste No. SOP 22/EHS/(6)/0320 Rev 06 dated on March 24, 2020.
- Residential Solid Waste Management SOP For identification of domestic waste, SOP number 16/EHS/(2)/0518 revision 2 dated May 2018.
- SOP for POME Pond Management (Liquid Waste) SOP Number 15/EHS/(0)/0409 Rev 00 April 2009.
- SOP for washing used packaging, work tools, contaminated personal protective equipment and management of used washing and rinsing water SOP Number 51/EHS/(1)/0320 March 2020.
- SOP POME Utilization for Land Application No. SOP 14/EHS/(02) 1021 Revision 2 on 1 October 2021.

The identification of waste is divided into several types, including:

Hazardous and Toxic Waste

Regarding the management of hazardous and toxic waste, waste transportation system is carried out in same time, so that for Festronik Document there are only 1 copy. Company has kept records properly so that waste management data can be traced easily and there are no recording differences. Company also records incoming and outgoing hazardous and toxic waste in every warehouse, this is also regulated and is in accordance with company's SOP.

Regarding transportation of hazardous and toxic waste, company cooperates with the official waste collection contractor, namely PT Maju Asri Jaya Bersama (PT MAJB). Company can show the cooperation agreement and licensing requirements that PT MAJB has as a waste transporter. Company has and can show documents for storing and handling Hazardous and Toxic Waste in accordance with SOPs for storing and handling waste and Government Regulation Number 22 of 2021. These documents include balance sheets, logbooks and Hazardous and Toxic waste manifests. Based on the results of the document review by comparing the balance sheet and logbook, it can be seen that delivery of waste to RHS POM waste warehouse in July and August 2021 was appropriate and there was no difference in the amount submitted. Similarly, comparison between the balance sheet and Manifest waste transportation carried out on 14 June 2022 shows that the balance document states the amount of waste in the month after transportation (July 2022) starting from empty. As well as for Estate Manifest waste transportation carried out on 14 June 2022 shows that the balance document states the amount of waste in the month after transportation (July 2022) starting from empty.

Based on document review, field visits and interviews with company, medical waste is still in at medical waste storage in RHS 1 Estate since 2021. Based on the results of interviews with company, company has made a request for transportation in November 2021, but is hampered by the Covid-19 pandemic. After that, the company also made a request for re-transportation in January 2022, but the cooperation contract with PT Transwaste Moda Indonesia (PT TMI) was being expired. Result of field visit shows that medical waste is still in at medical waste storage in RHS 1 Estate due to cooperation contract is currently being extended. The company has shown the results of communication with PT TMI since 9 March 2022 until 22 August 2022 based on Letter No. 0066/TMI-BPN/VIII/2022 dated 22 August 2022 regarding notification of the process of extending the cooperation agreement between PT TMI and PT RHS which expires on 11 February 2022, is currently drafting a Tripartite MoU. In addition, the company has also shown a document of coordination minutes with Environmental Agency of Seruyan Regency dated 29 August 2022 which states that Environmental Agency of Seruyan Regency has received information that the transportation of medical waste from PT RHS has not been able to be transported since 15 June 2021 and is in the process of extending the work agreement among PT TMI and PT PPLI.

Besides, it can be concluded that there are no recording errors and differences based on the Balance Sheet, Logbook and Festronik documents, this shows that the company has properly documented the storage and handling of waste. Company can show all licensing documents for the transporters, processor and users of hazardous and toxic waste as well as medical waste, from the results of document verification it can be concluded that PT RHS has collaborated with all waste management parties who have permits and are still valid until surveillance-1.2 is carried out.

Result of field visits to hazardous waste warehouses in RHS 1, RHS 2 and RHS POM also show that the company has carried out hazardous waste management quite well found in these locations. All requests for hazardous waste storage permits have been completed, such as the presence of fire extinguishers, showers, eyewash, MSDS, coordinates, alarms, first aid kits, oil traps and appropriate labelling. In addition, lighting and air ventilation are well provided, on the outside of the warehouse there are also good drainage channels to anticipate pollution to the surrounding environment. Result of the interview with the warehouse manager also showed that the manager had fully understood the SOP in the management of hazardous waste.

Non-hazardous and toxic waste

Non-hazardous and toxic waste, including domestic waste, is managed in the form of reuse for items that can still be used, such as used fertilizer sacks, as well as plastic layers inside the sacks to transport loose fruits and tie the sacks. 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. Non-hazardous waste that cannot be reused will be disposed of in a landfill with a landfill system when it is full. Transportation of non-hazardous waste from employee housing or emplacement areas is carried out once every 1-2 weeks using dump trucks and directly disposed of to the Landfill.

Liquid, Solid and Air Waste

The company does not utilize waste air which is generally used as a biogas power plant, but the company does utilize liquid and solid waste. For liquid waste (POME) utilization is carried out as a land application which is pumped from the WWTP to an application area that already has a permit. Meanwhile, solid waste such as shells and fiber are used as a substitute for diesel fuel as boiler fuel. Meanwhile, other solid wastes such as sludge and empty leaves are used for composting and applied to land for fertilizer substitution.

7.3.2

Based on interviews with company management and the Head of the Hazardous and Toxic Waste Warehouse at the sampling location, it is known that they have an understanding of the handling of waste disposal, especially hazardous waste and domestic waste and the management of hazardous waste in accordance with the procedures owned by the management unit. In addition, respondents also stated that these regulations are strictly enforced and there are sanctions for those who violate them. All waste disposal facilities have also been provided by the company such as organic, non-organic and hazardous waste bins and landfills. The respondent's understanding of waste management is the result of routine and consistent socialization and training as evidenced by the minutes that have been conducted on 12 August 2022 in RHS 1 Estate which has been attended by 144 participants including staffs and employees and with photo evidence and attendance list.

Regarding the transportation of Hazardous and Toxic Waste, the company cooperates with authorized waste collection contractors, namely PT Maju Asri Jaya Together (PT MAJB). The company can show the cooperation agreement and licensing requirements that have been owned by all parties involved in the transportation, processing, and monitoring of waste. The company has and can show documents for storing and handling Hazardous and Toxic Waste in accordance with SOPs for storing and handling waste and Government Regulation Number 22 of 2021. These documents include balance sheets, logbooks and Hazardous and Toxic waste manifests. For the transportation of non-hazardous waste from employee housing or emplacement areas, it is carried out every 1-2 times a week using a dump truck and immediately disposed of to the Landfill and will then be stockpiled when the landfill is full.

Based on the results of visits to the RHS 1 and RHS 2 Estate hazardous waste warehouses, information was obtained that the last transportation was carried out on October 22, 2021, so the condition of the warehouses during the visit was relatively empty. In addition, the landfill visit also shows that there are landfills that are full and have been stockpiled. For the new landfill, it is not in full condition and there are also no traces of waste burning activities at that location. Landfill is divided into two, namely for the type of organic waste and non-organic waste.

The results of interviews with workers and communities living in the company's area also stated that the waste management carried out by the company was very good and regular. Trash cans are provided properly and replaced if damaged. Regulations related to waste disposal are also strictly enforced and there are sanctions for those who violate them. Resource persons understand very well how to separate the types of waste they produce. In addition, the company is also committed to reducing plastic waste from bottled drinking water and that is also applied in all areas of the company, including housing for the community and employees. The field visit also showed that the housing conditions were very clean and there was no scattered garbage.

7.3.3

The company does not carry out open burning for waste culling, this can be proven from a field visit to the landfill where there are no encounters of incinerated waste. The results of interviews by mill and estate employees also stated that there was no burning of rubbish, because they were aware of the prohibition on burning activities and the sanctions they would receive if burning incidents. Organic waste from housing is managed by burial, while inorganic trash is disposed of in the space provided, then transported every 1-2 times a week and dumped into Landfill and then buried when the Landfill is full.

The results of field observations in the employee housing area also showed that there were no traces of burning activities, besides that there were also many warnings to prohibit waste burning activities as well as the dangers that could arise from burning activities. Interviews with employees who live in the housing estate also stated that they had never burned waste due to sanctions.

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 the management of soil fertility so that yields are optimal and have minimal impact on the environment, which among others are listed in the document Standard Procedure for Fertilization Application, document number SA 05/EMU/(2)/ 1021, Revision 1, October 2021. In addition, there are procedures for Soil Sampling for Soil Fertility Status (document number SA 12/EMU/(3)/1021) and procedures for Sampling of Oil Palm Leaves (document number SA 14/EMU/(1)/1021) as a consideration in calculating annual fertilizer recommendations.

The certification unit shows records of implementation of its practices according to established procedures, including:

- Leaf analysis results in 2021
- Soil analysis results in 2017
- Program and realization of organic fertilization using empty fruit bunch
- The 2021 Core Estate Manuring Action Plan document for mature and immature plantations.
- Documentation of fertilization recommendations and realization in 2022 for nucleus and plasma plantations.

Based on the results of field observations on fertilization activities, for example in RHS 1 Estate, it was found that fertilization was in accordance with the specified recommendations. Fertilizer staff have understood the procedure for applying fertilizer and the measuring device used has been calibrated by the R & D team. In addition, the company has also provided PPE in accordance with the results of the risk analysis determined.

7.4.2
Leaf Analysis

Leaf analysis is carried out once a year by the EMU Laboratory Laboratory. Leaf analysis documents are available for PT RHS 1 and 2 carried out in 2021 with the observed parameters, among others, for the major elements N, P, K, Mg and Ca as well as minor elements, namely: B, Cu, Zn and Fe. For example, block 052 in RHS-1 Estate with test parameters 2.56% N, 0.166 % P, 1.1 % K, 0.65% Ca, 0.32 % Mg and 20 ppm B.

Soil Analysis

Soil Analysis Activities - Laboratory analysis of soil conditions and nutrient content in soil samples to determine fertilizer recommendations in maintaining and improving nutrient balance in soil. Parameters measured included: Texture, Acidity (pH), Content of C, N, P, K, Mg, Ca, Na, BS, CEC, Al and H. Soil analysis was carried out for a period of 15 years in accordance with the Agronomy SOP for taking soil samples for soil fertility status (SA 12/EMU/(3)/1021).

Based on the results of interviews with representatives of the EMU (Ecology Management Unit) department, it was explained that the results of the analysis were included in the fertilization program.

7.4.3

The unit of certification has and implemented a nutrient recycling strategy, which includes the recycling of empty fruit bunches, the utilization of mill liquid waste and palm oil residue with the aim of encouraging the minimization of the use of inorganic fertilizers. Here are some of the documentation:

- EFB application.
Based on the results of interviews with unit management, it is known that the application dose of empty leaves for the plant area is + 40 tons/ha/year. Application of blanks is preferred in sandy areas and areas with a hardpan coating.
The certification unit has documented and evaluated the vacant term application activities in 2022, including those listed in the EFB RHS POM Application Plan Map and EFB RHS 1 Estate Program & Realization and Weekly Monitoring of EFB Mulching (Mature Area) 2022. Based on these documents, it is known the EFB application is only carried out at RHS 1 Estate and has been applied for 20,944.80 tons until September 2022.
- Palm oil mill effluent.
The certification unit utilizes palm oil mill effluent for Land Application in several blocks at PT STP (outside the scope of certification).

7.4.4

Records of fertilizer use are maintained and can be shown during audit activities, which are included in the 2021 Manuring Schedule document (updated until December 2021). Based on the document, it can be briefly explained the achievement of realization in 2021 per type of fertilizer, for example in RHS 1 Estate as follows:

- Kieserite: recommended 433,003 mt and completed 431,500 mt (99.65 %)
- MOP: recommended 2375 mt and completed 2150 mt (90.54%)
- Rock phosphate: recommended 111,800 kg and finished 111,200 kg (99.46 %)

Status: Comply

7.5

Practices minimize and control erosion and degradation of soils.

7.5.1

The company has conducted a semi-detailed soil survey based on a survey of Param Agriculture June 2007, which describes the distribution maps of slope and type of soil in the operational area. Semi detailed soil survey indicated there are areas were classified as marginal land with soil type Sandy and the limitation factor are drainage. The company shows the Minutes of Verification Results of Peatland at PT RHS Estate-II by EMU (Ecology Management Unit) R & D and GIS, with the results of verification of changes in peatland area at PT RHS Estate II survey date August 2021, with a result of 176.39 Ha , which is located in blocks 129, 130, 131, 132, 137, 152, 158, 159, 160, 169, 182,183, 189, 330, 352, 357, 358, 382 and 541. Based on the RHS Estate Map 2 Subsidence Location Map, Weira, piezometer, January 22, 2022, Map Ref. No. HD 22292. Which explains there are also 4 subsidence stakes, 4 piezometers and 65 weirs.

7.5.2

Based on verification of the year of planting data, it was found that there were new planting areas in 2018 and 2020. The clarification from management unit explained that the new planting area was a process resulting from land compensation carried out by the company to the community which was not previously included in the long-term plan. The entire cleared land has gone through a soil survey and Lo-Ri assessment process. Moreover, Based on the identification result in the slope map of SRTM3 in 2010 known that the company area is located in the area with a slope of 0-6% with a flat classification, so that the company does not perform specific management strategy in areas with a certain slope.

7.5.3

Based on the results of document studies and field observations, it is known that new oil palm plantings are not carried out on land with steep slopes according to applicable regulations.

Status: Comply

7.6

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

7.6.1

The company has conducted semi-detailed soil survey based on a survey of Param Agriculture June 2007, which describes the distribution maps of slope and type of soil in the operational area. Semi detailed soil survey indicated there are areas were classified as marginal land with soil type Sandy and the limitation factor are drainage.

Based on the results of document review, interviews with management and field observations at the RHS-1 Estate and RHS-2 Estate,

it is known that there have been no new plantings in unsuitable areas.

7.6.2

Based on the identification result in the slope map of SRTM3 in 2010 known that the company area is located in the area with a slope of 0-6% with a flat classification, so that the company does not perform specific management strategy in areas with a certain slope. The company presented the Land Suitability Survey Report of PT RHS-2 on 16 & 18 November 2017, which indicated that the planting was not on peat areas.

7.6.3

Based on the identification result in the slope map of SRTM3 in 2010 known that the company area is located in the area with a slope of 0-6% with a flat classification, so that the company does not perform specific management strategy in areas with a certain slope.

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

There will be no new plantings on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, or in new development areas.

Based on the results of the study of area statement data documents and interviews with management, it is known that there were plantings in 2018 in the RHS-2 Estate covering an area of 6.2 Ha. The company shows the Minutes of Mechanical Land Clearing in July 2018 in block 569 with an area of 6.2 Ha. The company also presented the Land Suitability Survey Report of PT RHS-2 on 16 & 18 November 2017, which indicated that the planting was not on peat areas.

7.7.2 & 7.7.5

- The unit of certification has documented and reported peat areas in the managed area to the RSPO Secretariat. This is shown based on the receipt from the RSPO GHG Unit on 19 May 2020.
- The peat inventory report for the Wilmar group is based on peat data in Indonesia and does not use semi-detailed survey results.

The unit of certification has documented and reported peat areas in the area managed by WILMAR GROUP to the RSPO Secretariat. This is shown based on receipt from the RSPO GHG Unit on 28 June 2021.

The peat inventory report for the Wilmar group is based on peat data in Indonesia and does not use semi-detailed survey results. The last PIPB Map Report is dated February 15, 2021.

PT RHS stated that there were no peat areas.

7.7.3, 7.7.4, 7.7.6 & 7.7.7

Companies can demonstrate the management of cultivation practices on peatlands, including the following:

- Monitoring of the subsidence pole on August 23, 2022 in Block 159 which informed that the identification results have not shown land subsidence because the subsidence pole has just been applied for the period of 20 April 2021.
- Piezometer monitoring on August 2022 2nd week in Block 130 which informed that the water level being maintained was 25 cm.

Based on the results of field observations at RHS Estate-II block 158 Division 2B, it is known that the results of monitoring at the water level in the ditch are known to be + 10 cm. This is due to conditions after the rain and there are dams / weirs.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

Based on the AMDAL 2009 document for PT RHS, document identification of HCV 2008, as well as maps of river flows and water sources it can be seen that there are several water sources points in the operational area of PT RHS there is a main river, namely Pukun River, as well as tributaries that spread throughout the company's management area. Based on the document, it is also known that the management plan for water sources is to test the quality of surface water every 4 months and monitoring wells every 6 months. All tests are carried out by accredited laboratory (LP-195-IDN). Regarding this, company shows the results of surface water quality

testing for all identified water sources contained in all RKL and RPL reports for the semester 2 of 2021 and Semester 1 of 2022. The company conducted a surface water test with 11 indicators in accordance with the matrix request in the 2009 AMDAL which was carried out in 3 sample locations, namely Upstream of Pukun River (RHS 1.1), Midstream of Pukun River (RHS 1.3) and Downstream of Pukun River (RHS 1.2) using quality standards based on Regulation Government Number 22 of 2021, class 2. The results of quarterly tests show that there are BOD and COD values which are all above the quality standard in First Quarter of 2022, while COD are above the quality standard. The management explained that the cause of the high BOD and COD values had occurred since the initial baseline when the 2009 AMDAL study was conducted. This is due to the characteristics of the river which is a semi-peat swamp forest area, as well as permanently inundated areas. For other factors that influence that there is a fishing village in the upstream of the river and high rainfall so that there is runoff from the surrounding area.

The unit of certification also does not limit access to clean water, and workers also have adequate access to clean water. Based on the results of field observations in the Estate housing area as well as interviews with fertilizer workers, spraying workers, and harvest workers, information was obtained that clean water facilities for housing were obtained from drilled wells provided by the company and for factory workers who lived in factory housing, the water source came from reservoirs which has been processed in WTP. The unit of certification has consistently had a water management plan for mills and plantations that is stated in the Environmental Management and Monitoring document as well as riverbank management programs and other water sources. Testing for drinking water is also carried out by the company to see the quality and quantity of ground water taken from monitoring wells and drilled wells. The guidelines used in measuring and testing drinking water quality use the Minister of Health Regulation Number 32 of 2017, concerning Environmental Health Quality Standards and Water Health Requirements and it appears that all parameters are below the standard quality standards. The realization of water quality improvements that have been carried out by the company include:

- Conduct socialization to all employees and the surrounding community not to use the water for consumption activities.
- Maintain a hygienic environment around water sources so that sources of pollutants can be minimized.
- Create a program to improve water quality gradually with the provisions of the applicable laws.
- Report the results of the examination in accordance with the provisions of the applicable laws.
- Testing the quality of river water and boreholes listed in the RKL/RPL report
- Management of surface water erosion and runoff, water management in low-lying areas and monitoring of surface water quality as stated in the implementation of the semester RKL-RPL
- Management of riverbanks and water sources in the form of reservoirs.
- Waste water management using WWTP and utilizing it in licensed application areas as well as monitoring the quality of wastewater and monitoring wells
- Monitoring the use of water for palm oil processing and evaluating its use.

7.8.2

Company already has procedures for the Management of River Basin and Riparian Belts within the Company's HGU which are contained in the SOP document No. SOP 20/HCV/1/2019 revision 4, effective April 1, 2019 approved by the General Manager. Where contained in the SOP for example:

Preventive Efforts Decrease the carrying capacity of watersheds (DAS)

- Protect and defend river border zones and river water bodies
- Protecting watersheds that are used by the surrounding community
- Conducting socialization and warning to operational employees and other parties about protecting watersheds

Watershed Management

- Border boundaries
- Installation of stakes / signs on the river border line.
- Management actions include, among others, making a watershed management plan and/or buffer zone, maintaining and protecting natural flora along the river border which functions to reduce the occurrence of surface and soil erosion, making efforts to restore the river in a planned and gradual manner.
- Surveillance measures. Carry out monitoring and monitoring of river areas and/or river border zones based on the management plan
- Do not carry out spraying, fertilizing and slashing activities in river border areas or buffer zones
- Determination of the width of river border lines and buffer zones (riparian reserves)
- The minimum width requirements for buffer zones or river border lines based on best practices for rehabilitation and management of riparian buffer zones are as follows:

River Width	Minimum width of buffer zone or river border
Small stream	5 m
5 - 10 m	10 m
10 - 20 m	20 m
20 - 40 m	40 m
40 - 50 m	50 m
> 50 m	100 m
Wetland Permanent Flow	100 m

The company has shown the water management document for 2022 PT RHS which has been signed by GEM PT RHS. The document contains the efforts that have been made by the company to maintain and regulate the existing and needed water for industrial, plantation and household purposes. surface and ground water. Sources of water availability at PT RHS are divided into 2 sources, namely reservoirs and boreholes. Water saving is done by:

- Doesn't take too long for clean up
- Inspection of water reservoir and water tendon
- Repair broken faucets and installations
- Wash the vehicle as necessary
- Watering plants as necessary
- Wash clothes using a minimum of water

The company has also made efforts to manage surface water quality, including:

- Conduct socialization and training to all employees, especially spray employees not to spray in river border areas to avoid washing chemical particles into the river when it rains. Based on interviews with spray workers, it is known that they have understood the prohibition against spraying up to river bodies and HCV areas.
- Determine all natural river border areas to be HCV areas, in addition, the entire HCV area is also delimited by irrigation canals and red markers to mark the boundaries of the HCV area.
- The company has marked the boundary of the spray area in the river border area, based on field observations to the river border it appears that there is no indication of spraying to the river body.
- The company has carried out reforestation and enrichment of river border areas with woody and erosion-preventing plants as well as local forestry plants.
- The company has conducted regular river water quality testing every quarter in collaboration with an accredited laboratory, the test results are reported to the relevant agencies along with the *RKL-RPL* reporting.

7.8.3

The management of POME from the processing of palm oil from the RHS POM with a capacity of 45 tons of FFB/hour is carried out in an WWTP pond located in the company's Business Use Rights (HGU) area. Before being channeled to the Land Application (LA), all POME is put into the WWTP with a single-feeding system which is then processed to reduce pollutant elements so that it is suitable for application to land. The certification unit has 13 WWTP pools. POME is managed according to the applicable national regulations, namely Decree of Minister of Environment No. 28 & 29 of 2003 regarding Technical Guidelines for the Assessment of Wastewater Utilization from Palm Oil Plantations for Land Application. The waste that was applied to LA came from pond 13 (Outlet).

The company also has a permit to utilize wastewater from the palm oil industry to PT RHS on land (Land Application) in accordance with the decision of the Regent of Seruyan Number 188.45/512/2015 dated December 16, 2015 which is valid for 5 years until December 15, 2020. Company has made efforts to extend the permit and the field verification stage has been carried out on March 11, 2021. However, based on the statement letter Number 660/330/DLH.II/VI/2021 issued by the Environment Service of Seruyan Regency in dated June 2, 2021, stated that the issuance of permits for Land Applications could not be carried out due to the latest law number 11 of 2020, so that it was waiting for the regulation of implementation instructions and technical instructions from Government Regulation Number 22 of 2021. In surveillance 1.2, company has shown effort to follow up this extension permit. Based on Minute of Field Survey on 17 February 2022 from consultant, it has been done field survey and initial hue environmental sampling for Wastewater Utilization Technical Approval Study (Land Application) of PT RHS. Based on result of interview with company, extension of land application permit is still in process by consultant with last communication for this extension with consultant is on 5 April 2022 regarding to result of environmental testing.

The company can show documents regarding the results of the measurement of the quality of liquid waste, namely the Liquid Waste Report per quarter and the RKL-RPL Implementation Report per semester which includes the results of the measurement of the quality of liquid waste every month. The test is carried out by accredited laboratory (LP-195-IDN) with reference to the Decree of Minister of Environment No. 28 of 2003. The results of the latest liquid waste quality testing in January-July 2022 have been in accordance with this regulation.

Monitoring the quality of wastewater at the outlet shows the results. Parameters monitored meet environmental quality standards. From the results of the Quarter 1 data analysis in 2022, there has never been a test result value that is above the specified quality standard. This shows that the liquid waste generated from FFB management activities is feasible to be applied to land (Land Application).

Based on the results of field visits to WWTP and LA, it also showed that there was no pollution to the environment such as leaks or flooding. Based on the results of interviews with WWTP officers, it was also stated that every liquid waste that flowed into LA was always recorded, the flowmeter used was functioning properly and there had never been any leakage and flooding in the WWTP area. LA is in a different company but still in 1 group, namely PT STP 2, LA operational is under Mill management, so management is still under PT RHS.

7.8.4

The company has a surface water extraction permit based on the Decree of the Head of the Central Kalimantan Province Investment and One Stop Service Office Number: 570/03/DPUPR-IPAP/II/DPMPTSP-2018 concerning the Granting of a Surface Water Concession Permit on the Pukun River in Pematang Limau Village, Seruyan District Downstream of Seruyan Regency, Central Kalimantan Province by PT Rimba Harapan Sakti January 8, 2018 and valid for 3 years. The permit has expired on January 8, 2021. Company has shown extension of this permit in accordance with recent regulation based on Letter No. 05/RMKT/DPUPR-SDA/VIII/2022 on 23 August 2022 regarding to Technical Recommendation of Surface Water Utilization Permit in Pukun River.

In the permit, there is an obligation to report water extraction / exploitation to the governor of Central Kalimantan once every 3 months. Debit collection for MILL and domestic operations must not exceed the agreed terms of 0.013 m³/second or the equivalent of 32,500 m³/month.

The company can also show documents from the recapitulation of water use for palm oil processing units for the period January-August 2022 along with proof of tax payments of previous period. From the document, it can be seen that the company has used water according to the budgeted budget and the permitted quota. Based on data on the use of surface water, the average use of water for FFB processing is 12,863.75 m³/month. The company also shows the water usage budget for FFB processing in 2022, which is 1.2 m³/ton FFB, and when compared to that, the average water use is still in line with the budgeted budget which is 0.66 m³/ton FFB.

The company has also carried out its obligations as a surface water user, namely paying a retribution for the use of surface water every year by showing the Record of Payment of Surface Water Tax Bills. The evidence shown is proof of payment Number 973/27/II/UPTPPD/SRY/2021 regarding the payment of surface water tax in 2021 (January-December) which was paid on 21 February 2022. Payments are made for the use of factory water, and each estate.

The results of the field visit to the Water Treatment Plan (WTP) also showed that the flowmeter used was still functioning well, and the officer responsible for the WTP was very understanding about how the WTP works 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

Company utilizes solid waste to increase the efficiency of the use of fossil fuels and to optimize renewable energy which can be proven by records of the implementation of solid waste utilization. This can be shown in the document recapitulation of waste utilization for the period January-August 2022 with the following data as follow:

Description	Unit	TOTAL
FFB Process	Ton	154,464.28
Shell used	Ton	4,208.128
Fiber used	Ton	19,308.091

EFB used	Ton	-
Energy is generated from biomass (KWh)	KWh	3,334,150
Energy use of biomass per tons of FFB	KWh/Ton TBS	21.58

Solid waste in the form of shells, and fiber is used to substitute diesel as boiler fuel. Based on the data on the results of solid waste utilization carried out by the company during this period, it can produce energy efficiency of 21.58 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

Certification Unit has carried out a GHG inventory within the scope of PT RHS, it can be concluded that the company has identified the source of GHG produced by PT RHS, especially for the RHS POM unit and its supplier plantations. Identification of significant sources of GHG emissions is identified and a mitigation plan has been developed by the company covering mills and plantations. Significant GHG emissions include land use change, POME processing, use of fertilizers and pesticides, use of fossil fuels for operations and transportation. The mitigation plans include, among other things, the right dose of fertilizer use and application as recommended, reduction of reuse and recycling actions, restrictions on electricity use, transportation and machine maintenance, and periodic air quality tests. The company has also reported the results of the GHG calculation to the public with a summary report that can be viewed on the RSPO website.

Reduction of fossil fuels at RHS POM has been implemented by using fiber, and shells for substitution boiler fuel. The company also uses POME with test results from the monitoring period January-July 2022, showing that all wastewater testing parameters have met the applicable quality standards. Based on the review of documents for example: monitoring of pesticide use, monitoring of diesel fuel, identification of HCVs and others it is found that accurate data have been entered into the RSPO palm oil GHG Calculator. GHG calculation using palm GHG Calculator 4.0. The summary of GHG emissions for the period January-December 2021, is listed as follows:

2022

Association	No. Estates/Plantations	FFB Processed (t)	Planted Area (ha)
Own Plantation	3	133,618.15	8,080.39
Group Plantation	6	27,098.92	25,513.61
3rd Party	1	475.04	0
Total	10.00	161,192.11	33,594.00

Summary Emissions

Description	Value	Unit	Description	Value	Unit
CPO	-0.32	tCO ₂ e/tProduct	Oil palm planted on mineral soil	33594.00	Ha
PK	-0.32	tCO ₂ e/tProduct	Oil palm planted area on peat	0	Ha
PKO	0	tCO ₂ e/tProduct	Total oil palm planted area	33594.00	Ha
PKE	0	tCO ₂ e/tProduct	Conservation area (Forested)	6041.74	Ha
OER	21.25	%	Conservation area (non-Forested)	1168.17	Ha
KER	4.41	%	FFB Production per hectare	22.87	t/ha

Mill Emissions and Credits & Emissions from Palm Kernel Crusher

Mill Emissions and Credits			Emissions from Palm Kernel Crusher	
Emission Source and Credits	tCO ₂ e	tCO ₂ e/t FFB	Emission Source	tCO ₂ e
POME	39747.52	0.25	PK from own mill	0.00
Fuel Consumption	537.37	0.00	PK from other sources	0.00
Grid Electricity Utilization	0	0.00	Fuel Consumption	0.00
Export of Excess Electricity to Housing & Grid	0	0.00	Total Crusher Emissions	0.00
Sale of PKS	-5591.69	-0.03		
Sale of EFB	0	0.00		
Total	34693.20	0.22		

Estate / Plantation Field Emissions and Sinks

Description	Emission (tCO2e)			TOTAL
	Own	Group	3rd Party	
Emission Source				
Land Conversion	42351.07	8605.34	0.00	50956.41
CO2 Emissions from Fertilizer	9517.32	1195.07	0.00	10712.39
N2O Emissions from Peat	0.00	0.00	0.00	0.00
N2O Emissions from Fertilizer	5847.82	717.74	0.00	6565.56
Fuel Consumption	2496.34	269.16	0.00	2765.50
Peat Oxidation	0.00	0.00	0.00	0.00
Sinks				
Crop Sequestration	-67782.52	-11181.18	0.00	-78963.71
Sequestration in Conservation Area	-39314.60	-525.69	0.00	-39840.29
Total	-46884.58	-919.56	-147.26	-47951.39

FFB Supplier

No	Supplier Name	FFB Production by Estate/Plantation (t)	FFB Supplied by Estate/Plantation (t)	Percentage of FFB supplied by Estate/Plantation (%)
1	RHS 1 Estate	82721.93	73749.43	89.15
2	RHS 2 Estate	59417.96	56274.36	94.71
3	RHS 1 Plasma	7718.84	3594.36	46.57
4	KSY 2 Estate	110529.08	421.90	0.38
5	KSY 3 Estate	61920.27	8912.58	14.39
6	KSY 3 Plasma	26889.92	4441.45	16.52
7	STP 1 Estate	110892.79	76.58	0.07
8	STP 2 Estate	133044.44	7055.82	5.30
9	STP 3 Estate	117528.80	6190.59	5.27
10	STP POM	475.04	475.04	100.00

Palm Oli Mill Effluent Treatment

POME Treatment	Unit	Value
POME Produce	t/yr	125449,81
CH ₄ (Total)	t/yr	1786,41
Applied N in POME	t/yr	56,45
Total N ₂ O emission from POME	tCO ₂ e/yr	0,38
POME Diverted to Compost	%	0
POME Diverted to anaerobic digestion	%	100
• POME to anaerobic pond	%	100
• POME to methane capture (flaring)	%	0
• POME to methane capture (electricity generation)	%	0

**POME is only processed in WWTP*

From the GHG Calculator data, it can be seen that the value of CPO and PK has decreased slightly from Recertification where currently (in 2020) the value is -0,38 tCO₂e / tProduct, while for 2019 the value is -0,19 tCO₂e / tProduct. This is due to the difference of FFB supplies to Mill. The low value of GHG is due to the fact that the company receives only a small amount of FFB supply from outside, but the total area of the supplier's plantations is much wider than the total area of PT RHS itself, so the divisor factor in calculating GHG is quite large. In addition, the company has an HCV area in the form of secondary forest with an area of 5,379 Ha, and the HCV area from the supplier's plantation is also quite large, so the crop sequestration generated from the HCV area is quite large.

7.10.2

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

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

Boiler burning activity at RHS POM is not significantly negative impact on air quality. PT. RHS is committed to always monitoring/testing periodically with the installation of Smoke Density, and environmental improvements through air pollution reduction programs such as reforestation programs around factories, improving work safety for factory employees by wear protective clothing (masks) and tightly cover office walls and equip it with air conditioning and perform maintenance on machines boiler equipment regularly. The unit of certification also carries out measurements and testing of stationary source emissions carried out on boilers and generator chimneys. Based on the analysis of the value of the test results, it can be concluded that there is no value that is above the applicable quality standard, namely Minister of Environment Regulation Number 15 of 2019 for Gensets and Number 07 of 2007 for Boiler.

Based on the results of field visits and interviews with management, the company has also taken several actions in managing emissions, including:

- Measure the height of the chimney according to the required height standards
- Planting reforestation trees as a green line in the factory and reservoir areas
- Using the recommended chimney exhaust emission technology, in reducing Air Pollution and noise in the processing plant environment
- Equip the chimney with holes for measuring air quality emissions, measuring instruments and wind speed directions, and safety ladders
- Testing and inspection of operational machines has been carried out by the company in cooperation with the relevant local government. This is indicated by the engine permit and the results of the 2020 inspection from the relevant agency
- Operational maintenance of stations in Mill as indicated in the realization document and factory machine maintenance plan for 2020

7.10.3

The certification unit has also identified other significant pollutants, as well as plans to reduce or minimize their impacts. Other sources of pollutants include ambient air quality, odor, vibrations and noise are carried out every 6 months. Significant impacts that are monitored include the operation of factory machinery, operation of generators, receipt and management of FFB as well as waste management activities.

Based on the results of measurements and testing of ambient air quality parameters originating from the use of fibrous fuel and shells in boilers and generator operations in general, it does not have a negative impact because it is still below the applicable quality standard value, namely Government Regulation Number 22 of 2021. PT RHS is committed to continue to monitor periodically and manage the deterioration of ambient air quality through reforestation programs around the factories and housing for PKS employees, Perform Road maintenance with laterization and road irrigation, as well as operate roadworthy vehicles.

Based on the results of measurement and testing of odor at the WWTP location and employee housing, it is still below the quality standard of the odor level stipulated in the Decree of the State Minister of the Environment No. 50 of 1996. Based on the test data, it can be concluded that wastewater treatment technology does not have a negative impact on the air (odor). The main anticipatory step is to maintain the condition of the bottom of the pond with adequate aeration where aeration really helps create an aerobic atmosphere at the bottom of the pond, besides that aeration also helps maintain high dissolved oxygen concentrations.

The vibration test results are also still below the vibration quality standard required by the Decree of the State Minister of the Environment No. 49 of 1996 concerning Vibration Level Quality Standards. Preventive measures in controlling the level of vibration that are expected to have a negative impact on the environment, among others, through periodic preventive engine units.

For the results of noise testing in employee housing areas and Mill offices, none of them are above the quality standard (KepmenLH No. 48 of 1996). However, for the results of noise measurements, based on Permenaker No. 5 of 2018 the area of the Boiler, Kernel, and Engine Room Stations shows that they are above the required quality standard values and for Thresher and Sterilizer stations are still in accordance with the required quality standards. With these conditions, in order to reduce potential hazards in the form of noise in the workplace and decrease health status (employee hearing), several control actions plan (programs) have been prepared to reduce the impact on the health factors of operators working at the location/station in accordance with the control hierarchy. danger and does not conflict with the basic principles of factory planning, namely economic feasibility factors, ease of tool operation, ease of maintenance factors and safety factors. Efforts that have been made by the company include:

- Replacement of components / redesign of tools / machines so that noise can be reduced, program maintenance of tools / machines periodically so that they are maintained
- Arrangement of working time by means of job rotation so that the amount of noise exposure to workers can be controlled (should not be >8 hours/day for a noise level of 85 dBA).
- Preparation of HIRARC (Hazard Identification Risk Assessment & Risk Control) documents for all activities at the Mill and socializing it to all related employees
- Conduct periodic SOP socialization and training to related operators.
- Installation of a "Noise Zone" warning signboard and mandatory use of PPE.
- Inspection and evaluation of the health of the workforce and the routine work environment at stations with a level of potential noise hazard.
- Inspection / inspection of the use of PPE by safety officers related to the discipline of using PPE and monitoring the condition and number of existing PPE.
- Provide PPE in the form of earplugs and earmuffs as well as perform audiometric health checks for factory employees which can be shown by field observation to mill and estate.

Status: Comply

7.11

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

7.11.1

The company demonstrated policies related to burning as contained in the zero deforestation, zero peat and zero exploitation policies on December 5, 2019. There is also a SOP document for forest and land fire mitigation and management number 001/SUS-SOP/II/2019 which came into effect September 9, 2019 The scope of the SOP includes planning, prevention, mitigation, post-fire management and reporting as well as coordination of firefighting and land preparation work, where the procedure explains that land clearing is carried out by mechanical means and zero burning.

Based on the results of the document review, it is known that until 2022 there is no plan for replanting activities within the scope of PT RHS certification. Based on the results of interviews with management and the Environment Agency, it was also stated that the company is committed to not burning for land clearing. Based on the results of field visits in the RHS 1 and RHS 2 estate, it was found that there were no signs or evidence of land clearing by burning, all land clearing was done mechanically by the company. On July 18, 2020, the company opened a new land area of 42.42 Ha due to land compensation in Blocks 257, 559 and 575 RHS 1 Estate. The results of field visits to the regions also prove that the company does not clear land by burning, all land clearing is done mechanically.

7.11.2

The company has a no-burn policy which states that PT RHS in running its business is committed to land clearing by implementing a no-burning system in all development, plantation and waste disposal activities. The company also has procedure number SOP 02/EHS/(4)/0921 revision 04 regarding emergency response procedures – emergency response team which was updated on 30 September 2021. The document describes in detail all aspects related to fire prevention, such as the person in charge, classification emergency level, general provisions, member formation, emergency handling, job descriptions and responsibilities of each member, fire emergency response flow and others. Companies can also show plans for forest and land fire prevention programs in 2022, for example:

- Carry out fire simulation activities

- The company also has a certified firefighter K3 Expert issued by the Indonesian Ministry of Manpower.
- Construction of the fire tower

The results of field observations at the Fire Brigade Warehouse show that all facilities and infrastructure are in good condition and well-maintained, which refers to the standardization of equipment at the Ministry of Agriculture 5 of 2018. In addition, the fire fighting simulation activities are also running well and the equipment used is functioning optimally.

7.11.3

The company showed the minutes of training and simulation of forest and land fires on March 30, 2022, which was attended by representatives from the target villages, estate and POM in the Central Kalimantan area of the Training Center. The company has also demonstrated a joint commitment between RHS and the Pematang Limau village community regarding fire prevention and control on March 6, 2017. Contents of the commitment:

- Cooperate in the prevention and control of forest and land fires in the area around the Pematang Limau village area
- Protect each other's land from possible fires
- Do not clear land by burning
- Assist each other in carrying out forest and land fire prevention and control activities
- Signed by Assistant GM of PT RHS, Group Estate Manager of PT RHS, Head of Environment of Seruyan Regency, Regional Disaster Management Agency of Seruyan Regency, Seruyan Hilir District, Head of Pematang Limau Village. They also handed over fire extinguishers to Pematang Jeruk Lipis Village, 1 unit of Robin Waterpump, Hoses, Nozzles, and Fire Jackets.

In addition, the Company also showed the Pematang Limau Village Agreement Decree No. March 18, 2020 regarding the Establishment of Fire Community Groups in Pematang Limau Village in 2020.

Status: Comply

7.12

Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.

7.12.1 and 7.12.8

The company did not clear land after 2005 without prior HCV assessment. The first land clearing was carried out in 2009 to 2013 at which time, the area to be managed had been assessed for HCV in June 2008 and the report was published in February 2009. The HCV assessment was carried out by Malaysian Environmental Consultant Sdn. Bhd. using the 2003 toolkit. From the results of the assessment, it was found that an area of 5009.20 Ha was identified as an HCV area for PT RHS.

WILMAR has reported the Disclosure of Liability for PT. RHS to the RSPO on July 31, 2014, where the Summary of Raw Liability covers an area of 935 Ha (time clearance period Nov 2005 – Nov 30, 2007) with Zero Liability status. Meanwhile, the Land Use Cover Change in accordance with the RSPO format was sent via email to the RSPO secretariat on 8 April 2015. There is evidence of communication with the RSPO via rspocompensation@rspo.org on 2 March 2017 which states that PT RHS is declared as zero non-compliant land clearances.

In 2020, there were plantings that were preceded by land clearing of 29.27 Ha blocks 257, 559 and 575 RHS 1 Estate. This is because the land is land that has not been compensated from the start, and the land owner only wants to receive compensation in 2018. Part of the land condition is already planted with oil palm, shrubs and HCV areas. Regarding this, the company has coordinated with the RSPO with email evidence related to land clearing in the area with the following evidence:

- On 9 December 2019, the company sent an email to the RSPO (khing.suli@rspo.org) asking if it is necessary to carry out LURI for land clearing of more than 10 Ha in the period November 2018-November 2019.
- On 9 December 2019, the RSPO (khing.suli@rspo.org) immediately responded to the company's question asking what scenario the company would use.
- On 9 December 2019, the company also immediately responded and stated that the scenario used was in an area that is an "existing certified plantation"
- On January 2, 2020, the RSPO (khing.suli@rspo.org) responded in the form of "the LURI will be made available on-site and shall be audited by the certification Body (CB) during the subsequent audit. Any nonconformance against the requirements during the audit shall result in heavy penalties which may include but may not be limited to a complaint case being filed and resolution be

facilitated via the RSPO complaints system.”

Related to this, the company has conducted a LURI study and can show the LURI results document in the area to be planted. Company has done land clearing which is not carried out in No Go status and they are maintained as HCV areas. This has also been verified through the LURI map which is compared with actual conditions in the field. The identification results indicate that the area has several categories, including:

- For land resulting from compensation under the name of Waing with a total area of 7.16 Ha, there is an area with Low-Risk status of 4.34 Ha, Risk area with a total of 1.69 Ha and No-Go Area of 1.13 Ha where for area No. Go is an HCV area based on the identification of the consultant.
- For the land that was compensated on behalf of Dimas and Sunyati with a total area of 40.7 Ha, there is an area with a Low-Risk status of 36.93 Ha and a No-Go area of 3.77 Ha where for the No Go area is an HCV area based on identification from consultant.

7.12.2

The first land clearing was carried out in 2009 to 2013 at which time, the area to be managed was assessed for HCV in June 2008 and the report was published in February 2009. Company did not conduct a High Carbon Stock (HCS) study because it did not clear land after 15 November 2018. The HCV assessment was carried out by Malaysian Environmental Consultant Sdn. Bhd. using the 2003 toolkit. The HCV assessment was carried out for the scope of the Central Kalimantan Project (CKP) with a total study area of 121,875.4 Ha which is divided into 7 units, one of which is currently PT RHS. At the time the HCV identification was carried out, PT Rimba Harapan Sakti (PT RHS) was still using the name PT Prima Sawit Makmur (PT PSM) with a total area of 13,792.4 Ha. From the results of the assessment, it is known that an area of 5009.20 Ha was identified as an HCV area for PT RHS and its management was determined to maintain and increase the value of the HCV.

However, there have been several changes in the total area of the HCV area with the following information:

- On December 28, 2013, the company re-delineated the HCV area internally based on the results of the 2008 study. The results of the delineation concluded that an area of 148.84 ha with initial HCV status had been cleared and planted by the company due to delays and miscommunication. with the land clearing contractor.
- The results of the delineation were then followed up by the company with a compensation mechanism by replacing the total open area of 148.84 Ha by establishing a new HCV area of 343.56 Ha or 2.3x of the already open area located around the existing HCV area. The compensation area is a forested area that has not yet been cleared.
- The results of the re-delineation also affect the initial HCV area from 5009.20 Ha to 5028.58 Ha. The area is then added to the compensation area so that it becomes 5372.14 Ha. The company also added new HCV areas outside the results of the 2008 HCV assessment (HCV non-MEC), namely the restoration area of 7.04 Ha and the riparian area of 16.62 Ha. This resulted in an increase in the HCV area with a total identified actual area of 5,395.80 Ha and has been maintained as an HCV Management area since 2014.
- Over time, in 2020 the company again issued a new HCV statement area, which was originally an HCV area of 5372.14 Ha to 5379.40 Ha and a non-MEC HCV area with a total of 24.40 Ha. This resulted in an increase in the area of HCV with the latest total identified area of 5403.80 Ha and has been maintained as an HCV Management area since 2020.
- Non-MEC HCV areas are riparian areas of natural rivers that were not identified as HCV areas in the 2008 study, however, the company designated the area as an HCV Management area even though it is currently an oil palm planted area.
- For the HCV area included in the 2021 statement area, the HCV area that has not been planted with oil palm is 5379.40 Ha, while for the non-MEC HCV area which is a planted area of 24.40 Ha, it is included in the planted area data.

In 2020, there were plantings preceded by land clearing of 29.27 Ha in blocks 257, 559 and 575 RHS 1 Estate. This is because the land is land that cannot be compensated from the start, and the new land owner is willing to receive compensation in 2020. Based on the results of the LURI study as described in indicator 7.12.1, it shows that the condition of the land is partly an oil palm planted area, scrub and HCV areas. For the HCV area of 4.90 Ha, the area is not cleared but is maintained as an HCV area.

7.12.3

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

7.12.4

The company has compiled and determined the HCV management plan in the HCV Workplan of Central Kalimantan Project (CKP)

Regular Program document for the period 2022 with the scope of Management, namely PT RHS. The integrated management plan was developed in consultation with relevant stakeholders and covers the areas that are directly managed and takes into account the relevant wider landscape level carried out in conjunction with the 2019 HCV Management Review Document. The HCV still maintained and cared for by the company by providing boundary stack, signboards and provide a border marking the boundaries of the HCV area in the form of a ditch that surrounds the entire HCV area. A management and monitoring plan is implemented for each type of HCV with the following programs:

- HCV patrols and wildlife monitoring using the SMART database program conducted every week
- Installation of camera traps for monitoring orangutans which is carried out 2 times a year
- Conduct a rapid assessment of HCV which is carried out every quarter.
- Creation of nursery collection of local plant seeds that will be used as plants for restoration of HCV areas
- Carry out restoration activities every month
- Patrol of potential forest and land fires which is carried out every quarter
- Drilling wells in HCV areas with high fire potential
- Socialization and communication to workers and communities around the company about forest fires, HCV, and protected flora and fauna
- Make an agreement on HCV management with stakeholders every 2 times a year
- Maintenance and installation of signboards and markers for HCV area every month
- Reporting the results of HCV management every year
- Review and evaluate the HCV management plan every year
- Carry out monitoring using drones which is carried out every year
- Provide assistance for the HCV area to be compensated
- Creating guidebooks and catalogues for the types of flora and fauna found in the company area
- Conduct virtual HCV training and seminars

The implementation of HCV management and monitoring for 2022 is carried out in accordance with the 2022 HCV management plan where the implementation time and intensity are also appropriate, which can be shown based on the following documents:

- Minutes of marking of HCV boundary in Block E72-E73 on 27-28 July 2022.
- Minutes of HCV posters in Block C10 on 8 December 2021, and Block A54 dan A96 on 29 March 2022.
- Minutes of wildlife raids in employee housing areas on 10 July 2022.
- Minutes of marking of HCV boundary in compensated land in Block C41-C43 on 1 November 2021.
- Minutes of nursery activity for woody plants in 2022 which has stated that company has planted woody plant with total 726 units until April 2022.
- Minutes of riparian restoration maintenance example carried out at blocks 471 of RHS 1 on 21-25 January 2022.
- Reports of HCV weekly patrol in RHS 1 and RHS 2 in 2022 period. This activity includes management activity, flora and fauna monitoring, and threat patrol of HCV.
- Minutes of socialization of HCV and wildlife protection on 10 June 2022 with a total of 307 employees participating in the socialization.
- Minutes of socialization of HCV and sanctions for burning forest and land to residents around PT RHS which were carried out from February to July 2022 with a total of 48 participants. Socialization is done by in-depth interview method by going directly to one-by-one participants.

The company has conducted a review related to management and monitoring activities in 2022 which is contained in the report on the implementation of management and monitoring of high conservation value herds in 2021 which contains evaluation and recommendations for management and monitoring as an improvement effort. Based on the results of the field visit, it can be seen that the management has been carried out by the company in the HCV area, such as installing signboards in all HCV areas visited, marking the boundaries of chemical application areas with red paint and planting local plants in river border areas. Interviews with management, workers and representative of Pematang Limau Village also stated that they knew the location of the HCV and the regulations that had to be complied with. Regarding conflicts with animals in the company area, the interview results stated that there had never been a conflict with animals in the last 1 year, although the river area in HCV was informed that there were crocodiles (*Tomistoma schlegelii*), but because the condition of the HCV area was still forest with very large land cover tight and inaccessible, there is never a conflict with the crocodile.

7.12.5

Based on document verification, it is known from the identification results that there are 7 people who clear land in the company's HCV area. Then on January 1, 2018, the HCV encroachment road map report compiled by the HCV sustainability team revealed that the party clearing the land increased to 48 people with a total disturbed area of 179.34 Ha (active claim area 28.07 Ha, open area 130.85 Ha, threatened (there is a cottage building) 48.49 Ha. This is because the company has not made compensation to the cultivators of the land, this is due to differences in perceptions that develop in the community where the HCV area defined by the company is an area that In addition, the company also has a policy of not compensating for the HCV area because oil palm plantations are not carried out considering that the HCV area owned by the company is quite large.

When the audit surveillance 1-1 was conducted, the company was able to show evidence that the problem-solving scheme had been carried out in several stages. Decisions are made through consultation with the community, namely through meetings and mediation either directly by both parties or involving third parties as mediators or witnesses. The certification unit has also considered various land management and tenure options to protect HCV management areas in a way that also protects the rights and livelihoods of local communities with evidence of socialization, mediation and land compensation reports that have been carried out since the beginning of the activity process.

Regarding the existence of land tenure by the community in the area that has been designated as an HCV area, PT RHS has made efforts to resolve it through approaches and mediation to the community from 2013 to 2021 when a 1-1 surveillance audit was carried out. Based on the results of interviews with the company, there are $\pm 2,571$ Ha of HCV area which belongs to the community with the current condition that the company has not fully compensated. Some of the realization steps that have been taken by the company to resolve these problems include:

- On April 10, 2019, the company entered into an agreement with the Pukun Lestari Sawit Farmer Group in Pematang Limau Village for compensation and joint management of HCV land under a land compensation scheme in 2 stages.
- On November 4, 2019, the company paid the first phase of land compensation of Rp 1,086,425,000 for 22 land owners with a total area of 434.57 Ha.
- On August 6, 2020, the company held another meeting with the community regarding the plan for phase 2 compensation, followed by a ground check on August 14 and 21 2020. The results of the ground check concluded that there are still further stages in the compensation process for land on behalf of Surianso and Budiansyah because there is other control on the land.
- On April 28, 2021, the company has paid the second phase of land compensation for 5 people with a total land area of 649.23 Ha of Rp. 1,623,075,000 and compensation for 8 people with a total land area of 201 Ha of Rp. 502,500,000.
- On October 8, 2021, the company responded to the land claim made by the Jambriaman Farmer Group on September 27, 2021, stating that the claim made by the Farmer Group had no clear basis. This shows that there is still potential for occupation in the PT RHS area.
- The results of field visits to several occupation locations, some areas have been compensated and restored, but several other areas are still occupied and have changed their function from HCV areas to fields or semi-permanent buildings.

Based on the surveillance assessment 1.1, the results of the interview by the company explained that the remaining areas that could not be compensated for would be included in the third phase of the scheme. Some areas have not been compensated because the land owner is not willing to pay compensation, or mediation with the land owner has not been able to do mediation. The initiation that will be carried out by the company in the 3rd stage is to provide compensation in the form of a partnership pattern in which the company will provide an area of ± 412 Ha outside the HGU area which will then be developed for community plantation provided that the community follows the scheme no longer allowed to manage land within the company's HGU area.

Based on the results of the document review and interviews with the company on surveillance 1.2, the company has compensated for land area of 434.57 ha in stage 1 and 649.23 ha in stage 2. Based on the results of the 2021 HCV Management and Monitoring Plan Review, compensation agreements and land co-management The HCV between PT RHS and Pukun Lestari Sawit Farmer Group is only limited to the process of releasing land by way of compensation and does not regulate how the joint management responsibility is intended to protect the HCV area. PT RHS has considered the potential positives and negatives of the PT RHS HCV compensation scheme. The positive potential of compensation scheme by establishing HCV joint management program that there is no company policy to carry out HCV compensation land in company concessions. Meanwhile, the negative potential of the scheme is that problems arise such as the use of HCV compensation funds of HCV joint management program cannot be accounted for in accordance with the purpose of submission and use by Pukun Lestari Sawit Farmer Group. Accordingly, PT RHS decided not to proceed with the HCV land compensation scheme of HCV joint management program and the partnership with Pukun Lestari Sawit Farmer Group taking into

account the problems that have arisen and have not been resolved as a result of the HCV land compensation scheme agreement which expires in April 2021.

7.12.6

The Certification Unit already has an SOP for Protection of Protected Animals and Plants Number 18/HCV/(2)/0419 Revision 3 dated October 2021. The document contains procedures consisting of preventive and repressive measures in the effort to protect protected wild animals and plants such as sustainability principle, all employees are advised not to hunt, capture, kill and sell endangered protected animals and plants and report any such activities. Maintain and not disturb the area designated as HCV area and report any illegal acts. Employees who do not comply will be subject to sanctions in accordance with applicable laws and regulations. The company also installs no hunting signboards with photos of species and sanctions for violating government regulations in all HCV areas.

The company has conducted a rapid survey in 2018 which was used as a biodiversity database at PT RHS which was carried out on 2-7 July 2018. Based on the results of the study, data obtained were 27 types of mammals, 21 species of reptiles, 107 species of birds, 5 species of amphibians, 52 species of freshwater fish and 111 species of plants. the results of the study for 2019 obtained results, namely an increase in the number of species in freshwater fish to 53 species, Aves to 113 species and plants to 113 species.

The company also shows the results of HCV monitoring carried out in 2021 that can be contained in the PT RHS annual HCV area survey document that carried out in 14 – 20 March 2021. Based on data from routine monitoring using animal encounters in the field as well as information on the existence of protected and endangered species showing that several types of animals can still be found in the PT RHS area. The monitoring results showed several types of animals were found, such as 27 species of mammals with 14 species of which are protected, 25 species of reptiles with 4 new additions from the previous survey, 113 species of Aves with 20 species of which are protected, 5 species of amphibians, 57 species of freshwater fish, and 111 species of plants. From the data from wildlife encounters with photographic evidence, it can be seen that the HCV area belonging to PT RHS still has animals which are a key species, namely the Orangutan (*Pongo pygmaeus*). Besides that, there are also many protected animals that are found such as Proboscis Monkey (*Nasalis larvatus*), Sun Bear (*Helarctos malayanus*), Sambar Deer (*Rusa unicolor*) and Pangolin (*Manis javanica*) as well as several other species that are included in the protection status according to the Minister of Environment and Forestry Regulation Number 106 of 2018.

The company has also carried out socialization of the existence of endangered plants and animals to all employees and the surrounding community, which is shown in the Minutes of socialization document, for example the HCV and wildlife protection on 10 June 2022 with a total of 307 employees participating in the socialization. All activities can prove with photos and the attendance list that attached to the document. Indirect socialization is also carried out by installing information boards and brochures warning signs related to conservation areas and the existence of endangered plants and animals that are protected in easily visible places, such as Estate entrances, Estate roads that are often crossed by the community, and other strategic places like office, and other public facilities.

Based on the results of interviews with management units and company employees regarding animal protection, the company has committed to protecting animals that are within the scope of corporate governance, such as implementing a ban on hunting, killing and maintaining wild animals in the company's environment. The procedures for animal protection also regulate the existence of sanctions or penalties for violating the provisions.

7.12.7

Avoid and prevent illegal hunting and/or encroachment of HCV areas that have been determined by PT. RHS, several warning boards have been installed regarding the prohibition of poaching and encroachment. Routine monitoring of HCV areas is carried out by several personnel appointed by the company. The results of field observations also indicate that there are signs that prohibit hunting of protected animals, burning, and marking the boundaries of conservation areas.

Monitoring of protected areas in 2022 is carried out periodically every week to ensure the security of the area. The monitoring activities were carried out at several river border locations. This monitoring is carried out to see the progress of the results of HCV management from the initial stage to the current conditions. The results of field visits to several conservation areas show that the company has carried out management of protected areas such as replanting local species, not logging, not using chemicals, and installing Protected Area signs and prohibiting hunting.

The company also conducts annual monitoring and evaluation for the management of HCV areas where these activities are aimed at identifying risks and impacts on conservation areas and enhancing protection efforts. Several activities are proposed based on the results of the 2022 evaluation conducted in June 2022, including:

- Increase socialization activities to staff, plantation employees and the community around the plantation to increase the level of understanding of HCV
- conducting surveys and monitoring of orangutans and using HCV management with the latest technology such as camera traps and drones.
- Adjusted the poster of protected animals based on Permen LH No.106/2018
- Conducting an annual survey in which the activity is an in-depth survey by collecting primary data from field observations and secondary data from monitoring results for one year.
- Using a SMART system where the flora and fauna monitoring data obtained are well documented and very comprehensive information includes maps, distribution, location of findings, numbers, and others. The SMART system is applied to every weekly flora and fauna monitoring activity, so the data owned by the company is very good.
- Carry out large-scale restoration, especially in border areas and areas that are open due to occupation activities by the community.
- Very intense assistance, mediation and socialization activities are carried out by the company to the community in an effort to protect flora and fauna, prevent fires and minimize potential land occupations.

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-1.2	PT Rimba Harapan Sakti do not use RSPO trademark and CB Logo.	✓
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of Logo Use	X or ✓
ASA-1.2	PT Rimba Harapan Sakti do not use RSPO trademark and CB Logo.	✓
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or ✓
ASA-1.2	PT Rimba Harapan Sakti do not use RSPO trademark and CB Logo.	✓
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate logo.	X or ✓
ASA-1.2	PT Rimba Harapan Sakti do not use RSPO trademark and CB Logo.	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

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

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

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

MUTU Auditor has verified company partial certification and concludes that:

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Yes, and positive assurance is produced for these units.</p> <p>Auditor verification Internal audit has conducted, for example:</p> <ul style="list-style-type: none"> - PT Sarana Titian Permata on January 2021 - PT Agronusa Investama on February 2021 - Treboum Adum smallholder on July 2021 <p>There is some non-conformance find in internal audit and the company has produced the positive assurance for these units.</p>
2.1.2	<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>There is no replacement of primary forest since November 2005. Uncertified management units has conducted HCV assessment such as :</p> <ul style="list-style-type: none"> • PT Sarana Titian Permata in June 2008, • 4 unit scheme smallholders under PT Kerry Sawit Indonesia in year 2008, • PT Agronusa Investama - Sambas and their scheme smallholders in year 2011, • PT Agronusa Investama - Landak/Pahauman in year 2011 (re-assessment in year 2014), • PT Buluh Cawang Plantation-West Kalimantan in year 2016, • PT Agro Palindo Sakti 2 in July 2009, • PT Indoresin Putra Mandiri in March 2009, • PT Daya Landak Plantation in July 2009, • PT Putra Indotropical in November 2008, • PT Putra Procentindo in December 2008, • PT Permata Hijau Plantation (block 22) in year 2012, • PT Kencana Sawit Indonesia in year 2010,

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> • PT Murini Samsam in year 2014, • PT Musi Banyuasin Indah in year 2013, • PT Sinarsiak Dianpermai in year 2014, • PT Agro Indah Persada in year 2011 and • Biase Plantation Limited in year 2011 & September 2014 (Calaro extension) <p>Some management units has carried out land clearing activities since November 2005 without preceded by HCV identification/assessment. Based on RaCP tracker (per November 2019) in RSPO website and the result of correspondence with RSPO compensation panel that the management units under Wilmar International Limited have :</p> <ul style="list-style-type: none"> • 24 management units with potential liability consist of 11 uncertified management units (2 uncertified management units still processing recertificatio) and 13 certified management units • RSPO member has submitted LUCA amount of 24 Management Units • LUCA of 20 management units has passed and 4 management units has reviewed and requiring clarification from RSPO member. • The 11 of 20 Management Units need/required Concept Note (CN). There are the 3 additional Management Units need Concept Note if compared with information of RaCP tracker per January 2019 (8 Management Units need Concept Note (3 uncertified management unit and 5 certified management unit)). Auditor has carried out clarification to the RSPO members and the RSPO secretariat. RSPO member do not know the name of the 3 additional management units because LUCA has been reviewed by RSPO but it is yet incomplete. Whereas, the result of clarification with the RSPO Secretariat that the compensation team is still updating the database so that the addition can occur due to duplicate. RSPO Secretariat will be informing to auditor again after updating finish. • 1 Management Units has submitted Concept Note (CN). Based on information from RSPO member that they has submitted Concept Note amount of 2 Management Units but the last of submit is January 2020 so that it not covered on RaCP tracker per November 2019. <p>Following up one of resolution from 35th BHCVWG meeting year 2017 are pushing certified management unit to submit annex 7 & 8 (compensation concept note & compensation plan) to RSPO compensation panel in annual surveillance audit by each certification body according time frame which has decided in meeting. The progress of the concept note approval can be saw in indicator of 7.12</p> <p>Information of LUCA for some uncertified management units as follow as :</p> <ol style="list-style-type: none"> 1. PT Agronusa Investama (Landak/Pahauman) : LUCA and disclosure of non-compliant land clearing was available and it

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>has submit to RSPO secretariat year 2015 and LUCA has passed with the result of liability assessment is presence liability (per 27 February 2017 and total of liability areas is 53.50 ha). The concept note has developing by internal team so it has not been submitted to RSPO secretariat.</p> <p>2. PT Buluh Cawang Plantation in West Kalimantan : LUCA and disclosure of non-compliant land clearing was available and it has submit to RSPO secretariat year 2015 and LUCA has passed with the result of liability assessment is presence liability (per 13 March 2017 and total of liability areas is 46.62 ha). The concept note has been developing by internal team so that it has not been submitted to RSPO secretariat.</p> <p>3. PT Agro Palindo Sakti 2 : LUCA and disclosure of non-compliant land clearing was available and it has submit to RSPO secretariat year 2016 and LUCA has passed with the result of liability assessment is zero conservation liability.</p> <p>4. PT Indonesia Putra Mandiri & PT Daya Landak Plantation : LUCA and disclosure of non-compliant land clearing was available and it has submit to RSPO secretariat year 2015 and LUCA has passed with the result of liability assessment is zero conservation liability.</p> <p>5. PT Putra Indotropical & PT Pratama Procentindo : LUCA and disclosure of non-compliant land clearing was available and it has submit to RSPO secretariat year 2015 and LUCA has passed (date on 13 March 2017) with the result of liability assessment is zero conservation liability.</p> <p>6. PT Sarana Titian Permata : LUCA and disclosure of non-compliant land clearing was available and LUCA has passed with the result of liability assessment is zero conservation liability.</p> <p>7. Based on the result of communication with RSPO that LUCA on behalf remaining uncertified management units has submitted and passed with the result of liability assessment is zero liability (2 uncertified management units) so not concept note required and presence liability (1 uncertified management unit) so concept note required. It has submitted concept note before November 2019.</p> <p>8. PT Musi Banyuasin Indah, PT Sinarsiak Dianpermai, PT Murini Samsam (466 ha) & PT Permata Hijau Plantation (block 22) : There are no planting after 1 November 2005 so RaCP status is not applicable.</p> <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>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	There are some newly developed plantation areas under Wilmar International and have undergone the New Planting Procedure (NPP). It has announced on RSPO website during 30 days with complete status such as in Jambi Province (PT Agrindo Indah Persada 2) & West Kalimantan Province (PT Agro Nusa Investama

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>(Sambas)) - Indonesia and Nigeria (Biase Plantation Limited & Biase Plantation Limited (Calaro extension).</p> <p>Benso Oil Palm Plantation has proposed new planting smallholder oil palm project on 1,477 Ha communal farmland located in Treboun in the Mpohor District of The Western Region of Ghana.</p> <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>
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>Uncertified management unit have technical procedure/guidance for land acquisition (SOP 001/WIP-KB/(0)/0610) and procedure of calculation & compensation payments (SOP 01/WIP-KB/(1)/1215). The records and documents of land compensation was available such as list of recapitulation of land compensation/acquisition, minute of measurement and their maps, profile/identity of land ownership and minute of agreement/negotiation between company and land ownership regarding handover/release of land. Based on self-assessment report that some uncertified management units (PT Daya Landak Plantation, PT Agronusa Investama – Pahuman, PT Putra Indotropical, PT Pratama Prosentindo, PT Agrindo Indah Persada 2 & PT Sarana Titian Permata – POM 2) has carried out some activities in order land acquisition process such as socialization to stakeholder and land owner, verification of land owner identity, measuring land/area in field together land owner, negotiating and agreeing on the price of land compensation and their plants, paying land compensation appropriate with the result of agreeing together.</p> <p>Community who loses access and land right for plantation areas has given the opportunity to benefit (direct and indirect) from plantation development as sample in form of scheme smallholder areas, as employee, as contractor (transportation, supplier for daily food, etc), as FFB supplier, using infrastructure/road as access from village to town or vice versa, as trader while employee has got wage, etc.</p> <p>Refer to case tracker or status of complaints under Wilmar International Limited period of February 2011 to conducting audit that the object of complaint has dominated by certified management unit and the majority of cases has closed. There are 2 case of complaints still in investigation process (PT Permata Hijau Pasaman and PT AMP Plantation). Further details on this case are available here: http://www.rspo.org/members/complaints/status-of-complaints/view/26</p> <p>Based on self assessment that no land conflict in the location of uncertified management units</p> <p>Auditor verification</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>There is no information from public source and RSPO website on any land conflict for uncertified unit of the group subsidiaries.</p> <p>Based on the company record there is documentation on land compensation recapitulation updated on 1 October 2007, participatory mapping, agreement letter on compensation between company and land owner, land owner identity and procedure on compensation technical guidance SOP 001/WIP-KB/(0)/0610 dated June 2010.</p>
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>There is a grievance and complaint form/procedure used by the company to collect and collate all complaints from communities and employee as sample in Indonesian is SOP 004/WIP-KB/(0)/0610, SOP 003/WIP-KB/(1)/0911, PRO-PGA-001 and Whistleblowing Policy (effective date on 5 August 2015). Procedure of grievance & complaint from employee has not been dissemination to employee in PT ANI-Pahuman, Cooperative of Tuah Jubata (scheme smallholder), PT Daya Landak Plantation, PT Indoresins Putra Mandiri & PT Putra Indotropical. It will be doing by auditee based on correction action plan.</p> <p>Based on self-assessment that uncertified management units have provided documentation of both the process which a dispute was resolved and the outcome and log book about handling grievance & complaint from internal (employee) & external. Based on log book that there are grievance & complaint from employee but there is no identified labor disputes ongoing at subsidiary companies of Wilmar International Limited.</p> <p>Auditor verification There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>The company has mechanism to handle employee complaint and grievance that is stated in SOP 005/WIP-KB/(0)/0610 for communication and consultation with community and SOP 004/WIP-KB/(0)/ 0610 on complaint and grivance mechanism and solving any dispute out off court.</p> <p>There is no list of employee and stakeholder complaint and grievance.</p>
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Uncertified management units have the list of laws & regulations or law register relate of plantation, environment, man power and OSH issue. The result of evaluation law and regulation with implementation by company.</p> <p>The evidence of compliance to laws and regulations such as land use right or land title (except uncertified management units as below), location permit for the location of uncertified management units in Indonesia, environment document has approved by local government (especially in Indonesia), minimum wage, minimum age as employee, etc. Whereas, Eyop Industries Limited and Biase Plantation Limited have deed grant, Deed of conveyance,</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Certificate of Occupancy and MoU with communities.</p> <p>Based on self-assessment report that there are not changing significantly if compare with previous condition i.e some of Wilmar's uncertified management units have not complied with certain legal requirements, i.e. :</p> <ul style="list-style-type: none"> Land use right (HGU) : PT Sarana Titian Permai (1 & 2), PT Agro Nusa Investama (Landak/Pahauman), PT Sinarsiak Dianpermai, PT Permata Hijau Pasaman (block 22), PT Murini Samsam (466 ha), PT Pratama Prosentido, PT Putra Indotropical, PT Indoresin Putra Mandiri, PT Buluh Cawang Plantation in West Kalimantan, PT Agroindo Indah Persada 2, and PT Daya Landak Plantation, where the land use right (HGU) are still under process. At time of this audit, the company was still making efforts to close these legal non-compliances. Forest areas release permit : part of PT Musi Banyuasin Indah areas and two estates under Eyop Industries Limited <p>Uncertified management units has carried out monitor of pillar boundary regularly except PT Agroindo Indah Persada 2 because has not been carried out cadastral measurement.</p> <p>Auditor verification</p> <p>PT Agroindo Indah Perkasa 2</p> <ul style="list-style-type: none"> There is HGU on propose. <p>PT. Buluh Cawang Plantation</p> <ul style="list-style-type: none"> HGU on process <p>PT Agronusa Investama Pahauman</p> <ul style="list-style-type: none"> The continues changing on PIPB map. In accordance to PIPB 10 there is no area of the company (based on location permit) that is in the moratorium area. When PIPB 11 released, some area of the company is in the updated peat moratorium map. <p>PT Agro Palindo Sakti 2</p> <ul style="list-style-type: none"> There is an obstacle on processing HGU is before continuing the HGU process, the company has to complete the requirement for 20% area allocation for smallholder. Based on Bupati Sanggau Decree No. 137 year 2011 dated 25 March 2011 for 623 ha of smallholder scheme for 2 koperasi of Batu Ceramin and and Maju Bersama. Later, koperasi Maju Bersama split into Koperasi Maju Bersama and Koperasi Harapan Baru. And Koperasi Harapan Baru wants to take about 136 ha within company proposed HGU area. The company needs to resolve this issue first before be able to continue HGU process. <p>PT Musi Banyuasin Indah</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> - Overlay the map of land use with attachments Ministerial Decree No. SK.822/Menhut-II/2013 PT MBI entered in production forest area. - Planting outside HGU Kebun Sei Selabu (block 010, 024 and 027). - Explanation management unit following the legal department still perform continuous coordination with the government while waiting for a change of government decisions regarding the status of the area. <p>PT Sinarsiak Dianpermai</p> <ul style="list-style-type: none"> - HGU 1,002 Ha on process - Status of Other Use Areas based on Appendix SK 878 / Menhut-II / 2014 dated September 29, 2014 and letter no. S.160 / BPKH.XIX-3/2016 dated March 31, 2016 <p>Explanation management unit as follows:</p> <ul style="list-style-type: none"> - Disagreement between the ministry of forestry by the Riau provincial government on the status of land PT SSDP (between the status of forest and APL), which led to the process of making the concession inhibited. - There are some estate areas around the Mill that does not have permission locations. The process of acquiring a location permit was hampered due to the reasons in point 1 as well. - The legal department is still doing continuous coordination with the government while waiting for a change of government decisions. <p>Based on website date on 13 & 21 June 2019 and 27 July 2019 that PT Putra Indotropical, PT Indoresin Putra Mandiri and PT Pratama Prosentindo have not been land use right (Hak Guna Usaha). The result of clarification from auditee that they are still in the process of completing the requirements in other ministries. This is one of requirements to apply for land use right at National Land Agency.</p>

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

3.4.1. Identification of Findings, Corrective Actions and Observations at ASA-1.1 Assessment

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 ARE NO NONCONFORMITY					
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	:				

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA 1.2 Assessment

NCR No.	:	2022.01	Issued by	:	Haikal RK						
Date Issued	:	9 September 2022	Time Limit	:	8 December 2022						
NC Grade	:	Major	Date of Closing	:	21 November 2022						
Standard Ref. & Requirement	:	6.2.2 Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.									
Evidence observed (filled by auditor):											
Wage Determination											
<ul style="list-style-type: none">Inter Office Memo No. 010/HRD-RO/IOM/III/2022 regarding the salary scale for employees of class 2A, 2B, 2C and 2D which determines wages for each group in accordance with the Seruyan District Minimum Wage in 2022, for example for Group 2B of IDR 3,393,000 valid on January 1, 2022.Based on a review of documents in the form of payslips for July and August 2022 on one of the personnel in the PAPs (Group 2 B), it was found that the basic wage paid was Rp. 3,383,000, so there was a difference/underpayment of Rp. 10,000 in accordance with company regulations.Corrections have been made by showing the Minutes of the Employee Salary Rapel due to the difference in the 2022 wage scale with the actual basic salary of the employees from January to August 2022. However, it is not yet certain whether the error occurred only in one worker. Besides that, no plans have been shown to ensure that something similar doesn't happen again in the future											
Overtime Implementation											
<ul style="list-style-type: none">PT Rimba Harapan Sakti's company regulations for the period 2021-2023, among others, explain the following:<ul style="list-style-type: none">Article 6 point 1 explains that overtime work is doing work that is ordered or asked by the company to be done by employees outside of 7 hours of work from Monday to Friday and 5 hours of work on Saturdays.Article 6 point 4 explains that the hourly overtime pay is 1/173 times the monthly wage.Article 6 point 7 stipulates the calculation of overtime, namely on normal working days, for the first overtime hour it is multiplied by 1.5 and the second overtime hour and so on is multiplied by 2, As for overtime on Sundays, the overtime pay paid in the first hour until the seventh hour is multiplied 2, for the eighth hour multiplied by 3 and for the ninth and tenth hours it will be multiplied by 4 hours.SPK No 012/RHS2/SPK/H/X/2019 regarding personnel work agreements as generator operators, regulated working hours, namely:<ul style="list-style-type: none">Monday to Saturday working 03.00 – 05.00 WIB and 17.00 – 22.00 WIB (7 working hours).Sundays at 03.00 – 05.00 WIB, 08.00 – 12.00 and 17.00 – 22.00 WIB (11 working hours).For the shortest working day, the salary paid is the same as the usual effective dayEspecially on Sundays, overtime is paid up to a maximum of 4 hours according to the agreementBased on a review of documents in the form of details of overtime calculations for personnel as operators in July and August 2022, the following were found:											
DATE		FROM THE DOCUMENT PROVIDED		TOTAL		ACCORDING TO CALCULATIONS IN COMPANY REGULATIONS		TOTAL		DIFFERENCE	
		BASIC WAGE	OVERTIME			BASIC WAGE	OVERTIME				
Saturday, 9 July 2022		132.708	-	132.708		132.708	67.121	199.829		- 67.121	
Sunday, 9 July 2022		-	156.194	156.194		-	556.142	556.142		- 399.948	
Saturday, 5 Agustus 2022		132.708	-	132.708		132.708	67.121	199.829		- 67.121	

Sunday, 6 Agustus 2022	-	156.194	156.194	-	556.142	556.142	- 399.948
<p>From the data sample, it was found that there was over time that was not paid on short days/ Saturdays and underpaid over time on holidays/ Sundays.</p> <ul style="list-style-type: none"> Company Regulations for the period 2021 – 2023 article 45 point 3 states: If there are things or work requirements in this company regulation that are lacking or contrary to the provisions of the applicable laws and regulations, the provisions of the applicable laws and regulations will apply (References to the Company Regulations include is the job creation law and government regulation 35 of 2021) <p>Non-Conformance Description (filled by auditor): The company has not been able to show sufficient evidence that the implementation of wages and overtime payments has fully complied with the published provisions</p> <p>Root Cause Analysis (filled by organization audited):</p> <ol style="list-style-type: none"> Wage scale is issued after the annual wage adjustment/increase. IOM wage scales have not been properly distributed to operating unit leaders. It is deemed not sufficient to comply with the calculation of working hours and normal wages. <p>Correction (filled by organization audited):</p> <ol style="list-style-type: none"> Make a list of employees whose wages are below the structure of the class 2 wage scale (PIC: HR-Regional) Calculating the difference in the unpaid shortfall for the period of January-August 2022 (PIC: PGA Unit) Make payment for the difference in salary gap (PIC: HR-Regional) Paying overtime wages for generator operators according to the calculation results in July and August 2022 (PIC: EM) <p>Corrective Action (filled by organization audited):</p> <ol style="list-style-type: none"> IOM wage scales are ensured to be distributed always at the first opportunity after the IOM is published (communication between PGA unit and HRR CKP) (PIC: HRD-Regional). Collecting wage data for class 2 employees after the issuance of the wage scale structure/internal memo scale wages and after the annual wage adjustment/increase (PIC: HRD-Regional) Make provisions (IOM) for generator operator holiday arrangements (PIC: HRD-Regional) Improved the generator operator's work description (PIC: HRD Group) Conduct IOM socialization to all generator operators (PIC: EM & HRD) Make a monthly work schedule and arrangement of permanent holidays for each generator operator (PIC: EM) Monitoring the implementation of the arrangement of working days and working hours of generator operators in accordance with applicable regulations (PIC: EM) <p>Assessor Evaluation and Conclusion (filled by auditor): Verify November 21, 2022 The company shows evidence of improvement in the form of:</p> <ul style="list-style-type: none"> Minutes of No. 001/RHS/POM-BA/X/2022 concerning wage adjustments for employees who have a wage difference against the 2022 wage scale. Payment of wage adjustments for overtime and salary differences. IOM No. 024/HRD-RO/IOM/X/2022 regarding operator settings and generator working hours. Minutes of socialization of generator operator working hours on 13 October 2022 in RHS 2 and on 21 October 2022 in RHS 1. Minutes of the difference in payment of wages and wages for RHS 1 and RHS 2 generator operators. Jodesk generator operator which has been revised on October 25, 2022 regarding work on Sundays is given according to the needs and calculations that have been determined by the company. Generator operator's work and holiday schedule. <p>Based on the root cause analysis, corrections, and corrective actions for discrepancies in this indicator are declared to have been fulfilled and will be re-observed in the next assessment.</p>							
Verified by	:	Haikal RK					

3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	6.7.1	<ul style="list-style-type: none"> The company has the opportunity to confirm the process of extending the Certificate of Appointment of General OHS Expert on behalf of Bayu Argo Giantino, which is still in process at the Ministry of Manpower of the Republic of Indonesia. The company has the opportunity to ensure the process of ratifying the OHS Committee Organizational Structure, Regional Fire Control Team & Fire Fighting PT RHS – Estate by the Department of Manpower and Transmigration of Central Kalimantan Province.

3.4.4. Noteworthy Positive Components

No	Description
1	Commitment to implement the principles of sustainable oil palm plantation management.
2	Competent support team and good document presentation
3	Already have partnership cooperation and plasma plantation development for the surrounding community


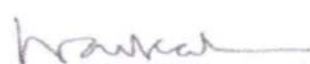
3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Labor Agency of Seruyan District. Interviewee: Head of Industrial Relation Date Interview: 6 September 2022</p> <ul style="list-style-type: none"> • Wage is suitable with regional minimum wage of regional regulation in 2022. • All workers have been registered to <i>BPJS Ketenagakerjaan</i> and <i>BPJS Kesehatan</i> including contract status/<i>PKWT</i>. • There are no workers under 18 years old. • There is no issue related to discrimination, forced labor, child labor, and sexual harassment which were reported to labor agency. 	<p>There is no negative issue that need further verification.</p>
<p>Plantation Agency of Seruyan District. Interviewee: Sub Coordinator Agriculture and Plantation Division Date Interview: 6 September 2022</p> <ul style="list-style-type: none"> • Company has good relationship and communication with Plantation Agency. • Company has routinely submitted mandatory reports to Company, such as plantation and plasma activity report, land fire report, and CSR report. • There was no land fire in company area during past year. • There are no issues related to disturbance of plantation business by community. • Plantation class assessment has been carried out in 2021. Until this period, decree of this plantation class is still waiting approval from Governor of Center Kalimantan. 	<p>There is no negative issue that need further verification.</p>
<p>Environmental Agency of Seruyan Regency Interviewee: Head of Environmental Management Division Date Interview: 6 September 2022</p> <ul style="list-style-type: none"> • Company already has already environment permit and hazardous waste storage permit which are still valid. • Company is in process of issuing technical approval for addendum of environmental document and land application permit. • Company has submitted mandatory report regularly. Environmental Agency has receipt Second Semester 2022, including report of management and monitoring, hazardous and toxic waste management, and POME management. • There is no complaint about environment pollution. 	<p>There is no negative issue that need further verification. Based on document verification and interview with management results, company is still in process of issuing technical approval for addendum of environmental document and land application permit. This change is taken for review towards compliance of applicable regulation. Company has shown evidence of this process as follows:</p> <ul style="list-style-type: none"> • Work Agreement No. 135/POM/RHS-IACO/01/22 on 3 February 2022 and valid until 3 February 2023 between PT Rimba Harapan Sakti and PT Amas Interconsultant regarding to issuing addendum of environmental document. • Sampling of environmental testing on 17 February 2022 which shows that efforts has been taken by consultant to test of parameters of air, water, and land. This result has been issued on 5 April 2022. Until this assessment has done,

Public Issues (Institution/ NGO/Community)	Auditor Verification
	<p>consultant is still in tabulating process of this results.</p> <p>Based on interview with company, this addendum will be finished before expiration of its contract (3 February 2023).</p>
<p>Pematang Limau Village Interviewee: Head Village Date Interview: 8 September 2022</p> <p>Generally, communication between village and company went well. However, according to Head of Pematang Limau Village, communication between company and village still needs to be improved especially related to social responsibility. It is also known that there's still land occupation in PT RHS but the area is decrease year by year. The compensation for land occupied still in progress.</p> <p>There is no issue related to environment pollution. PT RHS also accept worker from Pematang Limau village, but according to Head of Pematang Limau Village company needs to be more prioritize the Pematang Limau residents to be worked in company.</p>	<p>The settlement process of land occupation has explained in indicator 4.8.1.</p> <p>The social responsibility activity also has explained in criteria 3.4</p>
<p>KUD of <i>Koperasi Makmur Sejahtera</i> Interviewee: Head of Plasma Date Interview: 6 September 2022</p> <ul style="list-style-type: none"> • <i>Koperasi Makmur Sejahtera</i> has already agreement with PT RHS related to FFB supply. • There is new agreement for developing land between KUD and PT HRS. • There is not any complaint from <i>Koperasi Makmur Sejahtera</i> including payment implementation. • FFB price for <i>Koperasi Makmur Sejahtera</i> is updated every month. Any changes for FFB price are made via text message or telephone. • Company has socialized/training related to RSPO standard, such as agronomical technique, environment, and conservation. 	<p>There is no negative issue that need further verification.</p>
<p>Harapan Sakti Employee Cooperative Consultation on 06 September 2022 with the Treasurer</p> <ul style="list-style-type: none"> • The type of employee cooperative business is the provision of basic necessities • The purpose was established to facilitate workers' access to meet their daily needs. In addition to accessing cooperatives, access to meet needs includes the existence of stalls in housing, mobile vegetable vendors and a payday market. • The company's forms of support include the provision of buildings, transportation and debt cutting through payroll <p>There were no complaints during the cooperative's establishment.</p>	<p>In general, it can be concluded that there are no negative issues related to industrial relations within the scope of the company.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
Gender Committee <ul style="list-style-type: none"> • The gender committee consists of male and female representatives • No cases of sexual harassment in the last 1 year • The company provides rest time for new mothers to breastfeed their children • Menstrual leave is available with a mechanism to report to the foreman and will be examined at the clinic. • Maternity leave is given 1.5 months before and 1.5 months after giving birth by showing the results of a doctor's examination. • There is no difference between male workers and female workers. Every worker has equal rights in terms of employment opportunities and also anonymity protection 	<p>There are no issues that need further clarification and this information has been explained in the relevant indicators.</p>
Bipartite Cooperation Institutes of PT RHS and Labor union (Estate & Mill) <ul style="list-style-type: none"> • The company has provided PPE and wages in accordance with applicable regulations • The company routinely conducts high-risk health checks and periodic health checks. • The company has provided socialization related to PKB, company policies, work procedures and others. 	<p>There are no issues that need further clarification and this information has been explained in the relevant indicators.</p>
PT Sabindo (FFB Transporter) <ul style="list-style-type: none"> • Cooperation for the provision of drivers and transport units and cooperation has been ongoing since land clearing. • So far there have been no problems with payment and it is in accordance with the agreement. • All contractor workers have been included in the BPJS program. • Proof of membership has been sent to the company • Wages for contractor workers are in accordance with regional minimum wages • Provision of PPE is the responsibility of the contractor • The company regularly provides outreach related to the RSPO. 	<p>There are no issues that need further clarification and this information has been explained in the relevant indicators.</p>
CV Ain Aito (CPO Transporter) <ul style="list-style-type: none"> • Wages for contractor workers are in accordance with regional minimum wages • If there are a complaint, the contractor can submit it to a company representative • 2 times socialization regarding SCCS has been given in 2021 – 2022. • Contractor workers have been included in the BPJS program 	<p>There are no issues that need further clarification and this information has been explained in the relevant indicators.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
So far there have been no problems with payment and it is in accordance with the agreement.	
Previous Land Owner (SNY/SRS initial) <ul style="list-style-type: none"> • The land compensation process was carried out in 2019 covering an area of +/- 35 ha • There is no coercion in the land compensation process 	There are no issues that need further clarification and this information has been explained in the relevant indicators.

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 Rimba Harapan Sakti Group Estate Manager</p>  <p><u>Isnawan Haryoko</u> Monday, 21 November 2022</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Haikal Ramadhan Kharismansyah</u> Monday, 21 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 Communication	Date of Contact	Response	
						Yes	No
1	Labor Agency of Seruyan District	Seruyan District	-	Intreview by phone	6 September 2022	✓	
2	Plantation Agency of Seruyan District	Seruyan District	-	Intreview by phone	6 September 2022	✓	
3	Environment Agency of Seruyan Regency	Seruyan District	-	Intreview by phone	6 September 2022	✓	
4	Land National Agency of Seruyan Regency	Seruyan District	-	-	-	-	✓
5	Head Village of Pematang Limau	Pematang Limau Village, Seruyan District	-	Intreview by phone	8 September 2022	✓	
6	Harapan Sakti Employee Cooperative	PT Rimba Harapan Sakti	-	Direct Interview	September 06, 2022	✓	
7	Bipartite Cooperation Institutes of PT RHS	PT Rimba Harapan Sakti	-	Direct Interview	September 06, 2022	✓	
8	Gender Committee (Women Of Wilmar)	PT Rimba Harapan Sakti	-	Direct Interview	September 06, 2022	✓	
9	PT Sabindo (FFB Transporter)	Seruyan District	-	By phone	September 06, 2022	✓	
10	CV Ain Aito (CPOTransporter)	Seruyan District	-	By phone	September 06, 2022	✓	
11	Previous Land Owner (SNY/SRS initial)	Seruyan District	-	By phone	September 06, 2022	✓	
12	KUD of Koperasi Makmur Sejahtera	Seruyan District	-	By phone	September 06, 2022	✓	
13	RHS POM <ul style="list-style-type: none"> Security (2 persons) Weightbridge (2 Officers) WTP operator (1 person) Storage operator (1 person) Grading operator (3 person) Boiler operator (1 person) Press operator (1 person) Engine room operator (1 person) 1 WWTP operator 	Pematang Limau Village, Seruyan District, Province of Kalimantan Tengah	-	Direct Interview	06 September 2022	✓	
14	RHS-1 Estate <ul style="list-style-type: none"> HCV Officer (1 person) Boundary Officer (1 person) Daycare Officer (2 person) 	Pematang Limau Village, Seruyan District, Province of Kalimantan Tengah	-	Direct Interview	06 September 2022	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
	<ul style="list-style-type: none"> • Rinse house PIC (1 person) • Harvesting worker (6 person) • Fertilizer worker (10 person) • Raking worker (2 person) • PIC of All Store (1 Person) • Clinic (3 Person) • Workshop (1 Person) 						
15	RHS-2 Estate <ul style="list-style-type: none"> • HCV Officer (1 person) • Boundary Officer (1 person) • Storage operators (3 persons) • Workshop operator (4 persons) • Harvesting worker (4 person) • Fertilizer worker (8 person) • Spraying worker (8 person) • Application Solid Worker (2 person) • 1 manuring rinse house officer • 1 spraying rinse house officer • 1 generator officer • 4 Daycare worker 	Pematang Limau Village, Seruyan District, Province of Kalimantan Tengah	-	Direct Interview	07 September 2022	√	
16	WWF	Indonesia	wwf-indonesia@wwf.or.id	Questionnaire	29 August 2022		√
17	Sawit Watch	Indonesia	info@sawitwatch.or.id	Questionnaire	29 August 2022		√
18	WALHI	Indonesia	informasi@walhi.or.id	Questionnaire	29 August 2022		√
19	AMAN	Indonesia	rumahaman@aman.or.id	Questionnaire	29 August 2022		√

Appendix 2. Assessment Program

DATE	05 - 09 September 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 05 September 2022		
06.30 – 07.40	Jakarta → Semarang (transit)	All Auditor
08.50 – 10.15	Semarang → Pangkalan Bun	
10.30 – 15.30	Pangkalan Bun → Site	
15.30 - 16.30	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
16.30 – 17.00	Document Review <ul style="list-style-type: none"> Document Review Verification of Basic Information Mill and Estate 	All Auditor
Tuesday, 06 September 2022		
08.00 – 12.00	Public Consultation and Document Review <ul style="list-style-type: none"> public consultation with stakeholder to relevant agency in Ketapang Regency (by Phone) Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier Stakeholder consultation to affected communities surrounding the plantations and previous land owner Document Review Verification of Basic Information Mill and Estate 	ERL
09.00 – 12.00	Field observation to RHS-1 Estate <ul style="list-style-type: none"> Implementation of legal aspect (Land Ownership, Legal Boundaries) and HCV Management Implementation of Agronomy Aspect (Harvesting & transport, Manuring, Pesticide Application, IPM, EFB Application, etc) Implementation of environment and waste management aspect (inspection to chemical storage, fertilizer storage, Hazardous Waste Storage, clinic, etc) Observation of worker facilities (housing, school, worship, clean water, etc) 	AFF HRK/KKF
12.00 – 14.00	Break	All Auditor
14.00 – 16.00	Field observation to RHS POM : <ul style="list-style-type: none"> Supply chain verification (FFB receiving, weightbridge, FFB Sorting, Despatch CPO) Observation to chemical storage, hazardous waste storage, POME Pond, Emergency simulation, WWTP, etc Observation to processing activity 	HRK/KKF AFF/ERL HRK/KKF
16.30 – 17.00	<ul style="list-style-type: none"> Presentation of Daily Progress. 	All Auditor
Wednesday, 07 September 2022		

DATE	05 - 09 September 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 12.00	Field observation to RHS-2 Estate <ul style="list-style-type: none"> • Implementation of legal aspect (Land Ownership, Legal Boundaries) and HCV Management • Implementation of Agronomy Aspect (Harvesting & transport, Manuring, Pesticide Application, IPM, EFB Application, etc) • Implementation of environment and waste management aspect (inspection to chemical storage, fertilizer storage, Hazardous Waste Storage, clinic, etc) • Observation of worker facilities (housing, school, worship, clean water, etc) 	HRK AFF/KKF ERL
12.00 – 14.00	Break	All Auditor
14.0 – 17.00	<ul style="list-style-type: none"> • Document review and completing audit checklist. • Continuing public consultation (If needed) 	All Auditor
16.30 – 17.00	<ul style="list-style-type: none"> • Presentation of Daily Progress. 	All Auditor
Thursday, 08 September 2022		
08.00 – 12.00	Document review and completing audit checklist.	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.00	<ul style="list-style-type: none"> • Document review and completing audit checklist. • Interview with related personels during field observation (by phone). 	All Auditor
16.00 – 17.00	Presentation of Daily Progress.	All Auditor
Friday, 09 September 2022		
08.00 – 09.00	<ul style="list-style-type: none"> • Internal Meeting Auditor Team 	All Auditor
09.00 – 11.30	Closing Meeting : <ul style="list-style-type: none"> • Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timelie of CAR's, Conclusion)/ • Comments, Responses and Questions 	All Auditor
11.30 – 13.00	Break/Friday Prayer	All Auditor
13.30 – 17.00	Site → Sampit	All Auditor
18.20 – 19.55	SMQ → CGK	All Auditor