

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

**[✓] Surveillance**

Name of Management Organization : **Sungai Binti Palm Oil Mill, PT Agro Bukit subsidiary of Goodhope Asia Holdings Ltd.**

Plantation Name : **Tanah Putih Estate, Sungai Binti Estate, Sungai Lenggana Estate and Sawahan Estate**

Location : **Village of Natai Baru, Sub District of Mentaya Hilir Utara, District of Kotawaringin Timur, Province of Kalimantan Tengah, Indonesia**

Certificate Code : **MUTU-RSPO/082**

Date of Certificate Issue : 04 December 2020      Date of License Issue : 04 December 2022

Date of Certificate Expiry : 03 December 2025      Date of License Expiry : 03 December 2023

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.2	10 to 14 October 2022	Briyogi Shadiwa (Lead Auditor), Arief Tajalli, Kiki Fadli and Alexander Sitio	Moh Arif Yusni	Leonada

Assessment	Approved by PT Mutuagung Lestari on:
ASA-1.2	14 November 2022

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Figure 1. Location Map of PT Agro Bukit

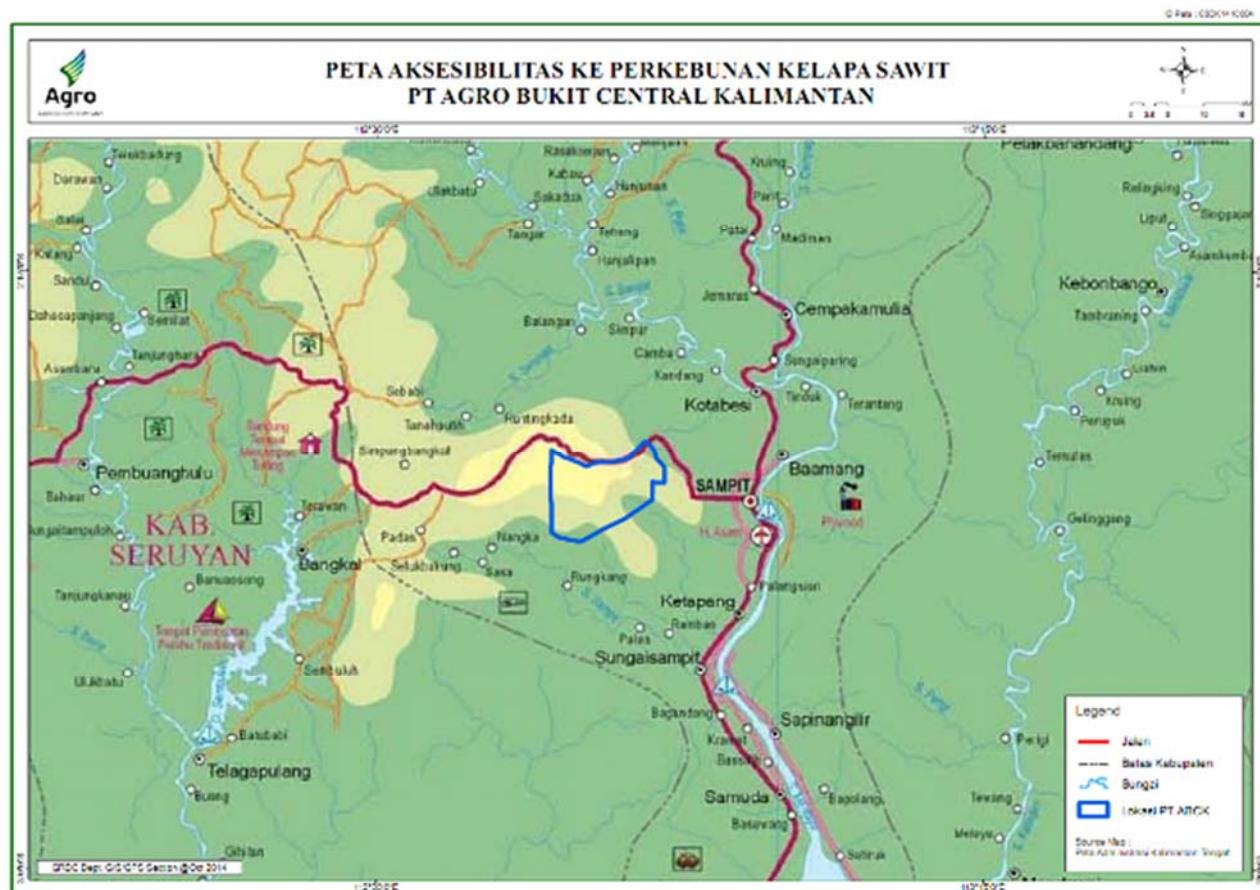
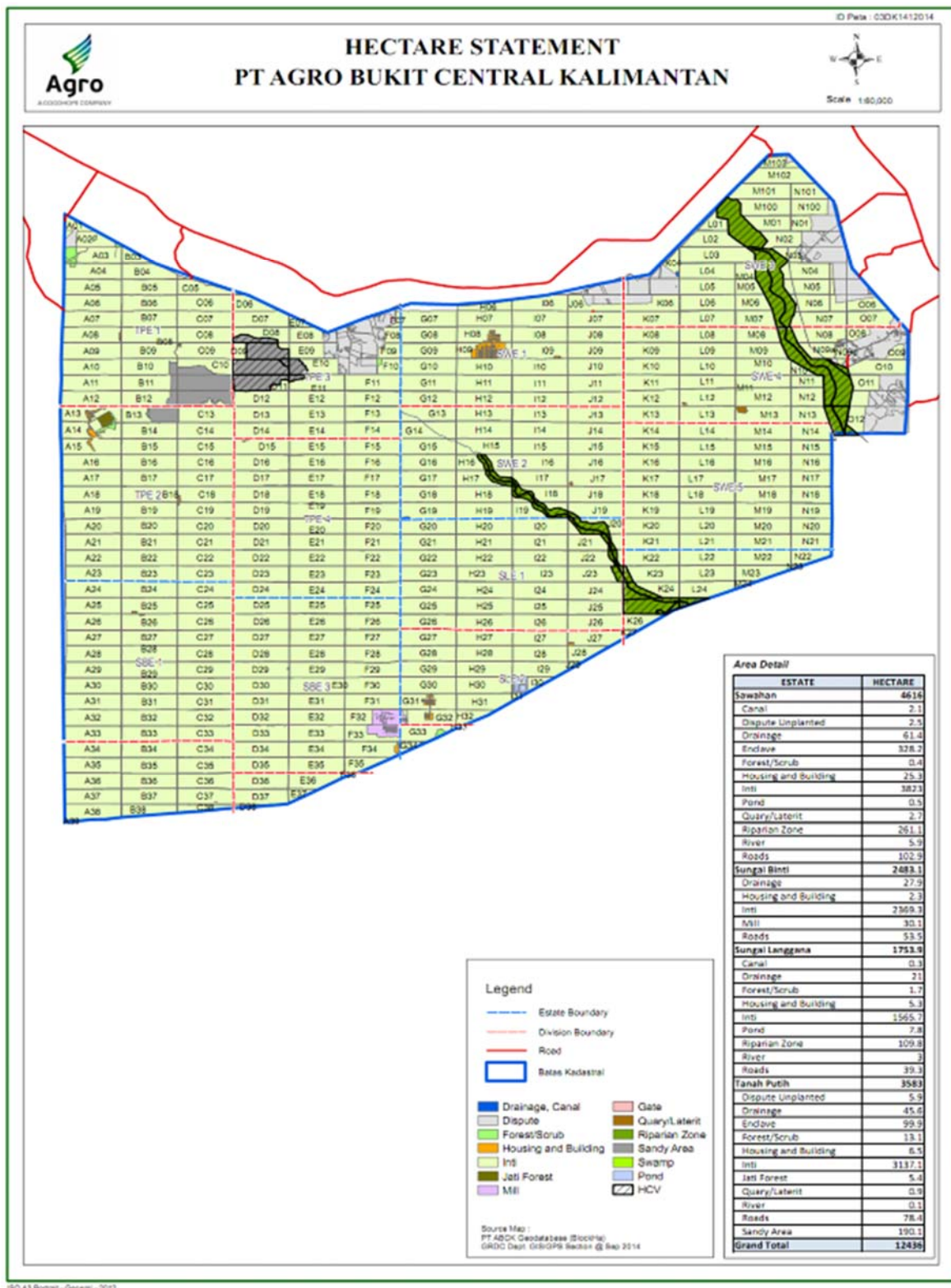


Figure 2. Location Map of PT Agro Bukit



## Abbreviations Used

a.i	:	Active Ingredient
ABCK	:	Agro Bukit Kalimantan Tengah
ANDAL	:	<i>Analisis Dampak Lingkungan</i> (Environment Impact Analysis)
APAR	:	<i>Alat Pemadam Api Ringan</i> (light fire extinguisher)
ASA	:	Annual Surveillance Assessment
BAPP	:	<i>Berita Acara Pemeriksaan Pekerjaan</i> (Work Inspection Minutes)
BMP	:	Best Management Practices
BOD	:	Biologycal Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Workers Social Security Agency)
BPKH	:	<i>Balai pemantapan Kawasan hutan</i> (Forest Area Consolidation Center)
CB	:	Certification Body
COD	:	Chemical Oxygen Demand
CPO	:	Crude Palm Oil
CR	:	Collection Road
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm oil
CSR	:	Corporate Social Responsibility
DPMPSTP	:	<i>Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu.</i>
EFB	:	Empty Fruit Bunch
EHS	:	Environment Health and Safety
EIA	:	Environmental Impact Assessment
FFB	:	Fresh Fruit Bunch
FGD	:	Focus Group Discussion
FIFO	:	First In First Out
FPIC	:	Free Prior dan Informed Consent
FY	:	For Year
GAP	:	Good Agricultural Practices
GHG	:	Green House Gas
GIS	:	Geographical Information System
GM	:	General Manager
GMO	:	General Manager Office
GPS	:	Global Positioning System
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title)
HR	:	Human Resources
ID	:	Identity
IHT	:	In House Training
IPM	:	Integrated Pest Management
ISO	:	International Organization for Standardization
ISPO	:	Indonesian Sustainable Pam Oil
JHN	:	Jaya Harapan Nusa
KER	:	Kernel Extraction Rate
KepmenLH	:	<i>Keputusan Menteri Lingkungan Hidup</i>
LD	:	Lethal Dosage
LEC	:	Palm oil leaf-eating caterpillars ( <i>UPDKS</i> )
LPUP	:	<i>Laporan Perkembangan Usaha Perkebunan</i> (Plantation Business Development Report)
LSU	:	Leaf Sampling Unit
LTA	:	Lost Time Accident



LUCA	:	Land Use Change Analysis
MB	:	Mass Balance
MCU	:	Medical Check Up
MOU	:	Memorandum of Understanding
MR	:	Management Representative
MSDS	:	Material Safety Data Sheet
NCR	:	Non-Conformity Report
NGO	:	Non-Government Organization
NTB	:	Nusa Tenggara Barat
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
OHSAS	:	Occupational Health and Safety Assessment Series
P&D	:	Pest and Disease
P2OHS	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja (OHS Committee)</i>
Permenakertrans	:	<i>Peraturan Menteri Tenaga Kerja dan Transmigrasi</i>
PIC	:	Person In Charge
PJOHS	:	<i>Perusahaan Jasa Keselamatan dan Kesehatan Kerja (Occupational Health and Safety Service Company)</i>
PK	:	Palm Kernel
PKE	:	Palm Kernel Expeller
PKO	:	Palm Kernel Oil
PM	:	Plantation Manager
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
POP	:	Persistent Organic Pollutant
PPE	:	Personal Protective Equipment
PR	:	Public Relation
PRM	:	Public Relation Manager
PROPER	:	Public Disclosure Program for Environmental Compliance
RC	:	Recertification
RKL-RPL	:	<i>Rencana Pengelolaan Lingkungan - Rencana Pemantauan Lingkungan</i>
RSPO	:	Roundtable Sustainable Palm Oil
SBE	:	Sungai Binti Estate
SBM	:	Sungai Binti Mill
SBSI	:	Serikat Buruh Seluruh Indonesia (Indonesian labor union)
SCCS	:	Supply Chain Certification System
SEIA	:	Social and Environmental Impact Assessment
SIA	:	Social Impact Assessment
SKU	:	Unit payment
SKU-H	:	Daily unit payment
SKU-B	:	Monthly unit payment
SLE	:	Sungai Lenggana Estate
SOP	:	Standard Operational Procedure
SPK	:	<i>Surat Perjanjian Kerja (Agreement Letter)</i>
SPSI	:	Serikat Pekerja Indonesia (Indonesian labor union)
SWE	:	Sawah Estate
TM	:	<i>Tanaman Menghasilkan (Mature Plant)</i>
TMAT	:	<i>Tinggi Muka Air Tanah (Ground Water Level)</i>
TPE	:	Tanah Putih Estate
TPH	:	<i>Tempat Pengumpulan Hasil (Place of Collection of Harvesting Results)</i>
WB	:	Weigh Bridge
WHO	:	World Health Organization

WLTK		<i>Wajib Lapor tenaga kerja</i> (labor report)
WTP	:	Water Treatment Plant
WWF	:	World Wildlife Fund
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE OF THE CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used		
		<ul style="list-style-type: none"><li>• RSPO Certification Systems for Principles &amp; Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governor on 12<sup>th</sup> November 2020.</li><li>• Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20<sup>th</sup> April 2020.</li></ul>	
1.2	Organisation Information		
1.2.1	Organization name listed in the certificate	PT Agro Bukit subsidiary of Goodhope Asia Holdings Ltd	
1.2.2	Contact person	Donald Ginting	
1.2.3	Organization address and site address	RSPO registered company: Menara Global, 5th Floor, Jl. Jend. Gatot Subroto Kav. 27, Jakarta 12950.	
1.2.4	Telephone	(+62) 21 528 92260	
1.2.5	Fax	(+62) 21 528 92259	
1.2.6	E-mail	<a href="mailto:donald.ginting@goodhope.co">donald.ginting@goodhope.co</a>	
1.2.7	Web page address	<a href="http://www.goodhopeasia.com">www.goodhopeasia.com</a>	
1.2.8	Management Representative who completed the application for certification	Donald Ginting	
1.2.9	Registered as RSPO member	1-0175-14-000-00 02 December 2014	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: Sungai Binti Mill, Sungai Binti Estate, Sawahan Estate, Sungai Lenggana Estate and Tanah Putih Estate.	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			LatitudeLongitude
	Sungai Binti Mill	Natai Baru Village, Mentaya Hilir Utara Sub District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia	S 02° 33' 48"E 112° 46' 05"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude (S)Longitude (E)
	Tanah Putih Estate	Penyang Village, Telawang Sub District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia	S 02° 31' 05"E 112° 44' 35"
	Sawahan Estate	Pasir Putih Village, oMentawa Baru Ketapang Sub District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia	S 02° 30' 46"E 112° 48' 44"



	Sungai Lenggana Estate	Bangkoang Makmur Village, Mentawa Baru Ketapang Sub District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia		S 02° 32' 44"	E 112° 47' 52"		
	Sungai Binti Estate	Bagendang Tengah and Natai Baru Village, Mentaya Hilir Utara Sub District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia		S 02° 33' 50"	E 112° 44' 37"		
1.5	Description of Area Statement						
1.5.1	Tenure						
	• State		12,436 Ha				
	• Community		- Ha				
	Total		12,436 Ha				
	*HGU existing : 2,086.4 Ha; HGU on process in scope of certification : 9,850.29 Ha and out of scope : 499.31 Ha (consist of 347.2 Ha as non HGU and 152.11 Ha as RaCP process)						
1.5.2	Area Statement						
	Total scope of certification area			11,936.69			
	Mature area			10,301.50			
	Mill			30.20			
	Infrastructure			480.00			
	Not Planted (Electricity Line & Kerangas Forest)			172.27			
	HCV			440.72			
	Occupation			512.00			
	*Total HCV based on assessment is 599.48 Ha which divided into two types of management, including conservation areas outside the scope with a total area of 158.76 Ha (located in the plasma) and conservation areas that are included in the scope of certification with a total area of 440.72						
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Tanah Putih (Ha)	Sawahana (Ha)	Sungai Lenggana (Ha)	Sungai Binti (Ha)	TOTAL (Ha)	
	2005	965.90	-	-	-	965.90	
	2006	1,966.90	1,104.00	590.90	1,864.30	5,526.10	
	2007	173.70	2,195.50	715.30	394.70	3,479.20	
	2008	-	307.10	16.20	-	323.30	
	2012	-	7.00	-	-	7.00	
	TOTAL	3,106.50	3,613.60	1,322.40	2,259.00	10,301.50	
1.6.2	New Planting area after January 2010			- Ha			
1.6.3	Planting Cycle			1 <sup>st</sup> 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 (%)
	Sungai Binti	90	423,177.18	88,463.78	20.90	20,124.83	4.76
	*Production data source from October 2021 to September 2022						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Production Area	FFB (ton/year)	Yield (ton/ha/	Supplied to Mill	
						FFB	%

			(Ha)		year)	(ton/year)	
	Tanah Putih Estate	3,639.40	3,106.50	71.526,88	23,02	71.526,88	100
	Sawah Estate	4,423.19	3,613.60	80.621,01	22,31	80.621,01	100
	Sungai Lenggana Estate	1,501.30	1,322.40	32.004,61	24,20	32.004,61	100
	Sungai Binti Estate	2,372.80	2,259.00	49.634,63	21,97	49.634,63	100
	<b>TOTAL</b>	<b>11,936.69</b>	<b>10,301.50</b>	<b>233.787,12</b>	<b>22,69</b>	<b>233.787,12</b>	<b>100</b>
	*Production data source from October 2021 to September 2022						
1.7.3	FFB description from other source						
	<b>Name of sources/Organization</b> (RSPO certified / non-certified)	<b>Type of Organization</b>	<b>number of smallholder</b>	<b>Production Area (Ha)</b>	<b>Supplied to Mill FFB</b> (tones/year)		
	<b>RSPO Certified</b>						
	-	-	-	-	-		
	<b>RSPO Non-Certified</b>						
	PT Agro Bukit (Non-Certified Area)	PT Agro Bukit	-	-	39,816.69		
	Plasma Bima Penyang Mandiri	PT Agro Bukit	614	209	4.011,10		
	Plasma KUD Permata	PT Agro Bukit	825	294	7.655,55		
	Plasma Rongkang Jaya Mandiri	PT Agro Bukit	300	404	8.242,43		
	Plasma Sinar Mentari Pagi	PT Agro Bukit	330	215	3.622,41		
	Plasma Bangkuang Makmur Lestari	PT Agro Bukit	519	264	6.492,13		
	External Suppliers (20 Supplier)	Independent Supplier	-	-	119,549.75		
	<b>TOTAL</b>						<b>189,390.06</b>
	*Production data source from October 2021 to September 2022						
1.7.4	Product categories		<b>FFB, CPO, PK</b>				
<b>1.8</b>	<b>Tonnage of Product</b>						
1.8.1	<b>Past Annual Claim Certified Product</b>		<b>Last Year Projected Certified Volume (MT)</b>		<b>Last Year Actual Production (Oct 21 to Sep 2022) (MT)</b>		
	FFB Processed		276,000		233,787.12		
	CPO Production		59,600		58,936.33		
	Palm Kernel (PK) Production		14,100		11,132.51		
1.8.2	<b>Product selling</b>						
	<b>Type of selling product</b>		<b>Actual selling product for last year October 2021 to September 2022 (MT)</b>				
	CSPO sold as RSPO certified product		56,157.05				
	CSPK sold as RSPO certified product		11,132.51				
	CSPO sold under another scheme		0				
	CSPK sold under another scheme		0				
	CSPO sold as conventional		1,899.49				
	CSPK sold as conventional		0				
1.8.3	<b>Estimate of Certified FFB Claim</b>						
	<b>Name of Estates</b>	<b>Total Area (Ha)</b>	<b>Production Area (Ha)</b>	<b>FFB (tones/year)</b>	<b>Yield (tones/ha/year)</b>		

	Tanah Putih Estate		3,639.40	3,106.50	71,500	23.02		
	Sawah Estate		4,423.19	3,613.60	83,000	22.97		
	Sungai Lenggana Estate		1,501.30	1,322.40	30,400	22.99		
	Sungai Binti Estate		2,372.80	2,259.00	49,700	22.00		
	<b>TOTAL</b>		<b>11,936.69</b>	<b>10,301.50</b>	<b>234,600</b>	<b>22.77</b>		
	<i>*Projected FFB production for 12 months of certificate</i>							
1.8.4	<b>Estimate of Certified Palm Product Claim</b>							
	<b>Name of Mill</b>	<b>Capacity (tones/ hour)</b>	<b>FFB Processed (tones/year)</b>	<b>CPO</b>		<b>Palm Kernel</b>	<b>Supply Chain Module</b>	
				<b>Out put (tones)</b>	<b>Extraction (%)</b>	<b>Out put (tones)</b>		<b>Extraction (%)</b>
	Sungai Binti	90	234,600	51,612	22.00	11,730	5.00	MB
	<i>*Projected CSPO and CSPK production for 12 months of certificate</i>							
1.9	<b>Other Certifications</b>							
	ISO 9001:2015				-			
	ISO 14001:2015				Certificate No. EMS 556261 valid until to 01 October 2022 issued by BSI			
	ISO 45001:2018				Certificate No. OHS 537919 valid until 10 June 2023 issued by BSI			
	ISCC				-			
	Others				PROPER BIRU period of 2020 to 2021 issued by Ministry of Environment and Forestry Republic of Indonesia			
1.10	<b>Time Bound Plan</b>							
1.10.1	<b>Time Bound Plan for Other Management Units</b>							
	<b>Management Unit</b>		<b>Estate (Supply Base)</b>	<b>Time Bound Plan</b>	<b>Location</b>	<b>Status</b>		
	<b>Mill</b>	<b>Time Bound Plan</b>						
	Terawan Mill (PT Agro Indomas)	2012	Terawan Estate	2012	Danau Sembuluh Sub District, Seruyan District, Kalimantan Tengah Province	Certified		
			Teluk Ulin Estate	2012				
			Lampasa Estate	2012				
			Lampasa Plasma	2012				
					Rim Capital Estate (PT Rim Capital)	2015	Hanau and Danau Sembuluh Sub District, Kotawaringin Timur District, Kalimantan Tengah Province	Certified
	Sungai Purun Mill (PT Agro Indomas)	2012	Sungai Rungau Estate	2012	Danau Sembuluh Sub District, Seruyan District, Kalimantan Tengah Province	Certified		
			Sungai Purun Estate	2012				
			Terawan Plasma	2012				
			Bengkal Plasma	2012				
	Sungai Binti Mill (PT Agro Bukit)	2015	Sungai Binti Estate	2015	Mentaya Hilir Utara Sub District, Kotawaringin Timur District, Kalimantan Tengah Province	Certified		

		Sawahan Estate	2015		
		Sungai Lenggana Estate	2015		
		Tanah Putih Estate	2015		
		PT Agro Bukit (499.3 Ha)	2022	Mentaya Hilir Utara Sub District, Kotawaringin Timur District, Kalimantan Tengah Province	Remediation Plan
Bukit Santuai Mill (PT Agro Wana Lestari)	2015	Penyahuan Estate	2015	Mentaya Hulu and Bukit Sentuai Sub District, Kotawaringin Timur District, Kalimantan Tengah Province	Certified
		Tanah Haluan Estate	2015		
		Keminting Estate	2015		
		Sangai Estate	2015		
		Tewehara Estate	2022		
		Purang Estate (PT Karya Makmur Sejahtera)	2022		
Bumi Jaya Mill (PT Agro Indomas)	2020	Sepaku Estate (PT Agro Indomas)	2022	Sepaku Sub District, Penajam Paser Utara District, Kalimantan Timur Province	Waiting for Land Title Permit (HGU)
-	-	Agro Bakti Estate (PT Agra Jaya Baktitama)	2022	Ketapang District, Kalimantan Barat Province	Mill is not constructed yet.
		Agro Jaya estate (PT Agra Jaya Baktitama)	2022		
-	-	Prima Khatulistiwa Estate (PT Sumber Hasil Prima)	2022	Sintang District, Kalimantan Barat Province	Mill is not constructed yet.
		Prima Sejahtera Estate (PT Sumber Hasil Prima)	2022		
-	-	Agro Sejahtera Estate (PT Batu Mas Sejahtera)	2022	Ketapang District, Kalimantan Barat Province	Mill is not constructed yet.
-	-	Sinar Jaya Estate (PT Sinar Sawit Andalan)	2022		
		Sinar Lestari Estate, (PT Sinar Sawit Andalan)	2022	Sintang District, Kalimantan Barat Province	Mill is not constructed yet
		Sinar Makmur Estate (PT Sinar Sawit Andalan)	2022		
		Agro Lestari Estate (PT Sawit Makmur Sejahtera)	2022		
-	-	Agro Makmur Estate (PT Sawit Makmur Sejahtera)	2022	Ketapang District, Kalimantan Barat Province	Mill is not constructed yet.
Nabire Matoa Mill (PT Nabire Baru)	2021	Bukit Nuhgogage Estate (PT Nabire Baru)	2021	District of Nabire, Province Papua Barat	Certified

		Bukit Nuhgogage Estate Non HGU Area (25.5 ha) (PT Nabire Baru)	2022		On HGU Process
		Bukit Nuhgojaje Estate RACP Area (72.2 Ha) (PT Nabire Baru)	2023		Initial Assessment on 2022
		Sungai Wami estate (PT Nabire Baru)	2021		Certified
		Sungai Wami estate RACP Area (1173.4 Ha) (PT Nabire Baru)	2023		Initial Assessment on 2022
		Kali Bambu Estate (PT Nabire Baru)	2021		Certified
		Kali Bambu Estate RACP Area (445.7) (PT Nabire Baru)	2023		Initial Assessment on 2022
		KPMA Waoha RACP Area (18.8 ha) (PT Nabire Baru)	2023		Initial Assessment on 2022
		KPMA Wate Asiaina RACP Area (118.6 ha) (PT Nabire Baru)	2023		Initial Assessment on 2022
		Sungai Sima Estate RACP Area (0.8 Ha) (PT Sariwana Adi Perkasa)	2023		Initial Assessment on 2022
		Sungai Sima Estate (PT Sariwana Adi Perkasa)	2021		Certified
		Sungai Sima Estate Non HGU Area (0.2 ha) (PT Sariwana Adi Perkasa)	2022		On HGU Process
		KPMA Sarakwari & Koroba RACP Area (28.7 Ha) (PT Sariwana Adi Perkasa)	2023		Initial Assessment on 2022
	-	-	2023	All location of Goodhope Plantation	--
<i>*TBP updated September 2022 and signed by Director of Sustainability</i>					
1.10.2	<b>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</b>				
	PT Agrobukit has a scheme smallholder which is fully managed by the company. The realization of smallholder scheme development was carried out in 2018 - 2019 which was shown through the MoU on plasma development between PT Agrobukit and Smallholder (Cooperative).				

<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>ASA-1.2</b>	<p><b>1. Briyogi Shadiwa (Lead Auditor).</b> Indonesian citizens. Associate Degree of Oil Palm Plantation, Bogor Agricultural University. He has work experience since 2009 in several private oil palm plantation companies in Indonesia as Assistant Agronomy and Agronomy Quality Control. The trainings that have been attended include: RSPO Lead Auditor Course by Checkmark, ISPO Auditor Training by LPP, Lead Auditor ISO 9001: 2015, RSPO Supply Chain Certification Training Course by Checkmark, Lead Auditor ISO 14001: 2015, SMOHS Awareness, OHSAS 18001 Awareness: 2007, SA 8000 Awareness, ISO 45001: 2018 Awareness and General OHS Expert Training. In this audit, he verified the Legal, BPM, OHS and SCCS aspect.</p> <p><b>2. Arief Tajalli (Auditor).</b> Indonesian citizen, Bachelor of Forest Resources Conservation and Ecotourism, Faculty of Forestry, Bogor Agricultural University. Has been involved as a researcher at a wildlife laboratory, Faculty of Forestry, IPB. The trainings that have been attended include training for ISO 9001; 2008, ISO 14001; 2004, ISO 17021; 2015, ISO 17065, ISO 19011 and ISPO Auditor training by Mutu Institute and RSPO Auditor Training by Checkmark, also participating in several IHT in the field of environment, BMP, and so on. Has participated in several audit simulation activities related to the sustainable palm oil certification system since 2020 with social, environmental, GHG, and waste management aspect. During this assessment, he verified the Environmental, GHG, and Waste management aspects.</p> <p><b>3. Kiki Fadli (Auditor).</b> Indonesian citizen. 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 New Refreshment Lead Auditor ISPO, Lead Auditor RSPO, General OHS Expert, ISO 9001:2008, ISO 14001:2015, ISO 17021, ISO 17065, HCV, SMOHS and ISH Lead auditor training conducted by RSPO. During this assessment, he verified the employment and transparency.</p> <p><b>4. Alexander Sitio (Auditor Trainee).</b> Indonesian citizen, now in the process of studying Doctoral Program at State University of Jakarta in Human Resource Management, Masters in Human Resource Management, University of Jember. Bachelor of Agriculture, Department of Agricultural Socio-Economics, Faculty of Agriculture, University of Lampung. He has 10 years' experience working as operational staff of one of the leading private oil palm plantation companies in Indonesia. The trainings that have been attended include training for ISO 9001; 2008, ISO 14001; 2004, ISO 17021; 2015, ISO 17065, ISO 19011, and participating in several IHT in the field of environment, best management practices, and GHG aspect and social aspect. During this assessment, he verified the BMP and OHS aspects 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>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
<b>ASA-1.2</b>	<p>Number of auditors: 3 auditors and 1 auditor trainee</p> <p>Number of days for <b>ASA 1.2</b> Onsite Audit: 5 days</p> <p>Number of working days for <b>ASA 1.2</b> Onsite Audit: 15 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>ASA-1.2</b>	<p>The assessment was conducted by measuring the implementation of certification system and standard conducted by PT Agro Bukit, Sungai Binti POM Unit Certification based on:</p> <ul style="list-style-type: none"> <li>RSPO Certification Systems for Principles &amp; Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governor on 12<sup>th</sup> November 2020.</li> <li>Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20<sup>th</sup> April 2020.</li> </ul> <p>The scope of certification of Sungai Binti Mill consist of one mill (Sungai Binti Mill) and four estates (Tanah Putih Estate, Sawahan Estate, Sungai Lenggana Estate and Sungai Binti Estate).</p> <p>The audit program is included as Appendix 2. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors</p>



were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site. Some opportunities for improvement of the results ASA-1.2 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). Improvement of findings from recertification were observed by auditors at this ASA-1.2 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.2.

The opening meeting was held on 10 October 2022. As for the participants who attended the opening meeting included the Regional Head, Area Controller, Estate and Mill Managers, Support Team from Jakarta and other staff at Sungai Binti Mill. Closing meeting was held on 15 October 2022 attended by the same participants as the opening meeting. Management PT Agro Bukit accept all the ASA-1.2 audit results.

During the COVID-19 pandemic, there were several modifications to the audit activity due to health protocols. Audit process carried out with high safety protocol procedure that developed by Certification Body and the unit of certification. Before an onsite audit carried out, there are several meetings to discuss health protocol procedures. There are several activities that are not possible to do face to face, such as public consultations with government agencies, communities, or previous landowners so that these activities are carried out by telephone. Furthermore, during field observation auditor only verification the activity and interview process carried separately by telephone. Document verification conducted separately through the electronic files.

Stakeholder consultation involved internal and external stakeholders. Discussion was held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each discussion, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings. The comments made by external stakeholders were also taken into account in the assessment.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates through teleconference. Fieldworkers were interviewed informally in small groups in the field. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix III.

Commonly, the audit activities went smoothly with good cooperation from the unit management. The presentation of documents is presented quite well by involving related personnel.

All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and the assessment program please find Appendix 2.

### 2.2.3 Locations of Assessment

#### ASA-1.2

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

#### Sungai Binti Mill

- **WTP.** Observations and interviews related to water management, recording of water use, health checks, PPE and waste management.
- **Reservoir.** Observation about reservoir, OHS implementation, and water pump room.
- **WWTP.** Field observations related to Ban to entry to WWTP, run off, testing of effluent and recording of effluent debit effluent.

- **Mill drainage.** Observation and interview related mill drainage.
- **Empty Bunch Area.** Observation of the management of Solid waste consist of EFB, fiber and shell from the production process of mill.
- **Security post.** Interview with security about worker welfare, OHS implementation, emergency situation, worker training, FFB supplier, and complaint mechanism.
- **Weigh bridge.** Interview with worker about worker welfare, OHS implementation, emergency situation, worker training, SSCS aspect, and complaint mechanism.
- **Laboratories.** Observation and Interview with worker about worker welfare, OHS implementation, emergency situation, and waste management.
- **Grading station.** Interview with security about worker welfare, OHS implementation, emergency situation, worker training, best practice, and complaint mechanism.
- **Dispatch station.** Interview with worker about worker welfare, OHS implementation, emergency situation, worker training, SSCS aspect, and complaint mechanism.
- **Loading Ramp Station.** Observation and Interview with worker about worker welfare, OHS implementation, emergency situation, worker training, SSCS aspect, and complaint mechanism.
- **Sterilizer Station.** Observation and Interview with worker about worker welfare, OHS implementation, emergency situation, worker training, SSCS aspect, and complaint mechanism.
- **Press Station.** Observation and Interview with worker about worker welfare, OHS implementation, emergency situation, worker training, SSCS aspect, and complaint mechanism.
- **Thresher Station.** Observation and Interview with worker about worker welfare, OHS implementation, emergency situation, worker training, SSCS aspect, and complaint mechanism.
- **Boiler Station.** Observation and Interview with worker about worker welfare, OHS implementation, emergency situation, worker training, SSCS aspect, and complaint mechanism.
- **Engine room.** Interview and observation related to work procedure, OHS implementation and employment.
- **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.
- **Workshop.** Observations and interviews with officers related to material handling, work procedures, OHS, wages and environmental management.
- **Fire Extinguisher warehouse.** Observations related to condition of storage, fire extinguisher equipment, and land fire management.

### Sungai Binti Estate

- **Boundaries poles and land demarcation No AB018, AB061, and AB064.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **POME Land Application and monitoring well, Block E32.** Observation on waste water management and nutrient cycle strategy, as well as soil water quality monitoring.
- **Uncertified Area Block B43** Observation related uncertified area, FFB separated and land disputes potency.
- **Harvesting, Block A37 Division 2 and Block A31 Division 1.** Field observations and interviews related to aspects of BMP, OHS, and Labour.
- **Fertilizer, Block D31 Division 1.** Field observations and interviews related to aspects of BMP, OHS, Environment and labour.
- **Spraying, Block D35 Division 4.** Field observations and interviews related to aspects of BMP, OHS, Environment and labour.
- **Piezometer, Peat subsidence, water level meter, Block B36 Divisi 2.** Observation of water management on peat soil by installing piezometer, water level meter, and bund off.
- **Owl cage, Block F32 Division 3.** Field observations implementation of integrated pest control.

### Sawahan Estate

- **Boundaries poles and land demarcation No AB002 and AB003.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HCV Area (Lenggana River Riparian), Block N14/N15.** Observation fo HCV management.

- **HCV Area (Anak Lenggana River Riparian), Block H15/H16.** Observation fo HCV management.
- **Material storage.** Observation about storage condition, kind of material, PPE stock, and OHS implementation, and interview with worker about worker welfare, OHS implementation, and complaint mechanism.
- **Pesticide storage.** Observation about storage condition, pesticide stock, OHS implementation, and emergency response, and interview with worker about worker welfare, OHS implementation, and complaint mechanism.
- **Sterilizer storage.** Observation about storage condition, sterilizer stock, OHS implementation, and emergency response, and interview with worker about worker welfare, OHS implementation, and complaint mechanism.
- **Firefighting storage.** Observation about storage condition, tools stock, OHS implementation, and emergency response, and interview with worker about worker welfare, OHS implementation, and complaint mechanism.
- **Workshop.** Observation and interview with workers about worker welfare, OHS implementation, waste management, worker training, and complaint mechanism.
- **Clinic.** Observation about clinic condition, infectious waste management, and interview with paramedic about work accident, waste management, and gender committee.
- **Housing complex (join with Tanah Putih Estate).** Observation about domestic waste management, housing and other facilities condition, and emergency response.
- **Harvesting, Block L14 Division 4 and Block L3 Division 3.** Field observations and interviews related to aspects of BMP, OHS, and Labour.
- **Fertilizer, Block I14 Division 2.** Field observations and interviews related to aspects of BMP, OHS, Environment and labour.
- **Spraying, Block J14 Division 2.** Field observations and interviews related to aspects of BMP, OHS, Environment and labour.
- **Piezometer, Peat subsidence, water level meter, Block M15 Divisi 5.** Observation of water management on peat soil by installing piezometer, water level meter, and bund off.

### Sungai Lenggana Estate

- **Pheromone Trap, Blok I27, Divisi 1** Observations related to pheromone traps, physical state and use in the activity of pheromone trap functions.
- **Beneficial Plant, Block B28, Divisi 1.** Observations related to beneficial plants, physical condition and usefulness in the activity of beneficial plant functions. (*Antiginone leptopus*, *Turnera subulata* and *Cassia cobanensis*)
- **Manuring, Block I31/32, Divisi 3.** Observation and interviews with foremen and workers related to work procedures of manuring, health insurance and labor protection, safe working practices and use of PPE.
- **Circle and Path Spraying, Block H28/29, Divisi 1.** Observation and interviews with foremen and workers related to work procedures, health insurance and labor protection, safe working practices and use of PPE.
- **Harvesting activity, Block I27/28, Divisi 1.** Observation and interview with worker about worker welfare, OHS implementation, best practice, worker training, and complaint mechanism.
- **Piezometer, Peat subsidence, water level meter, and bund off/stop off, Block J31, Divisi 3.** Observation of water management on peat soil by installing piezometer, water level meter, and bund off.
- **Pesticide storage.** Observation about storage condition, pesticide stock, OHS implementation, and emergency response, and interview with worker about worker welfare, OHS implementation, and complaint mechanism.
- **Area of Body shower of spraying team and mixing.** Observation the conditions body shower room, sprayer storage, hazardous waste management and PPE handling.
- **Housing complex.** Observation about domestic waste management, housing and other facilities condition, and emergency response.
- **Daycare.** Interview with workers about worker welfare aspect, complaint mechanism, gender committee, and other facilities provided by company.
- **Housing complex.** Observation about domestic waste management, housing and other facilities condition, and emergency response.
- **Boundaries poles and land demarcation No AB071, and AB031.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HCV Area, Block K24.** Observation for HCV management
- **Material storage.** Observation about storage condition, kind of material, PPE stock, and OHS implementation, and interview with worker about worker welfare, OHS implementation, and complaint mechanism.

- **Pesticide storage.** Observation about storage condition, pesticide stock, OHS implementation, and emergency response, and interview with worker about worker welfare, OHS implementation, and complaint mechanism.
- **Sterilizer storage.** Observation about storage condition, sterilizer stock, OHS implementation, and emergency response, and interview with worker about worker welfare, OHS implementation, and complaint mechanism
- **Workshop.** Observation and interview with workers about worker welfare, OHS implementation, waste management, worker training, and complaint mechanism.
- **Clinic.** Observation about clinic condition, infectious waste management, and interview with paramedic about work accident, waste management, and gender committee.
- **Housing complex (join with Sungai Binti Estate).** Observation about domestic waste management, housing and other facilities condition, and emergency response.

#### Tanah Putih Estate

- **Harvesting activity, Block F20/21, Divisi 4.** Observation and interview with worker about worker welfare, OHS implementation, best practice, worker training, and complaint mechanism.
- **Circle and Path Spraying, Block E15, Divisi 4.** Observation and interviews with foremen and workers related to work procedures, health insurance and labor protection, safe working practices and use of PPE.
- **Barn Owl Box, Block F24, Divisi 4.** Observations related to Barn Owl Box, the condition of Barn owl box and the level of presence and activity of owls.
- **Pheromone Trap, Blok E17, Divisi 4** Observations related to pheromone traps, physical state and use in the activity of pheromone trap functions.
- **Beneficial Plant, Block E18, Divisi 4.** Observations related to beneficial plants, physical condition and usefulness in the activity of beneficial plant functions. (*Antiginone leptopus*, *Turnera subulata* and *Cassia cobanensis*)
- **Manuring, Block F15, Divisi 3.** Observation and interviews with foremen and workers related to work procedures of manuring, health insurance and labor protection, safe working practices and use of PPE
- **Piezometer, Peat subsidence, water level meter, and bund off/stop off, Block D8, Divisi 3.** Observation of water management on peat soil by installing piezometer, water level meter, and bund off.
- **Boundaries poles and land demarcation No AB009, AB010, and AB011.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **Occupation Area Block A01 & A02.** Observation related to occupation area.
- **HCV Area, Block D12.** Observation for HCV management.

2.3	<b>Stakeholder Consultation and Stakeholders Contacted</b>
2.3.1	<b>Summary of stakeholder consultation process.</b>
ASA-1.2	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT. Agro Bukit was held by:</p> <ul style="list-style-type: none"> <li>• Public announcement on the MUTU website on September 26, 2022.</li> <li>• Public consultation meeting with government institution of Kotawaringin Timur Regency on October 13, 2022.</li> <li>• Public consultation meeting with communities including previous land owner on October 13, 2022.</li> <li>• Public consultation meeting with internal stakeholders and contractor on October 13 2022.</li> <li>• Consultation with NGO (Yayorin Kalteng, Walhi Kalteng, Borneo Nature Foundation, Save Our Borneo, Lestari Hutanku) on October 10<sup>th</sup> 2022.</li> </ul> <p>Numbers of input from stakeholders were clarified by PT Agro Bukit.</p>
2.3.2	<b>Stakeholder contacted</b>
	Please find appendix 1
2.4	<b>Determining Next Assessment</b>
	The next visit (ASA-1.3) will be conducted eight (9) months to twelve (12) months after date of certificate.

### 3.0 ASSESSMENT FINDINGS

#### 3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Sungai Binti POM – PT Agro Bukit, subsidiary of Goodhope Asia Holdings LTD operation consisting of one (1) mill and four (4) oil palm estates.

During the assessment, there were three (3) Nonconformities were assigned against Major Compliance Indicator(s); and three (3) opportunity(s) for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidence.

MUTUAGUNG LESTARI found that Sungai Binti Mill – PT Agro Bukit subsidiary of Goodhope Asia Holdings LTD complied with the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification System for Principles and Criteria, 12 November 2020.

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>		
<b>1.1</b>	<b>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.</b>	
<b>1.1.1</b>	<p>The certification unit has a list of information/documents listed in the Communication, Participation, and Consultation Procedure Number IMS.P-05. The documents contained in the SOP can be accessed and/or shared with stakeholders such as government agencies, external audit and other stakeholders. The document contains several types of documents that can be accessed by stakeholders, including the following:</p> <ul style="list-style-type: none"> <li>• Social and Environmental Documents: Environmental impact analysis documents, HCV identification reports, SIA identification reports, Community empowerment program reports, social conflict handling procedures, Continuous improvement program documents, Complaints / dissatisfaction reports and others.</li> <li>• Legality Documents: Evidence of land rights tenure, Human Rights policy documents, RSPO audit report documents, and others.</li> <li>• Employment Documents: Documents for the implementation of occupational health and safety, Number of employees and list of basic wages as well as proof of payment of BPJS, NPWP and Tax Data, and Reports of the Committee for the Trustees of Occupational Health and Safety and others.</li> </ul> <p>Meanwhile, for documents that cannot be accessed by the public that are company secret, namely financial data such as expenses and income, as well as details related to customers and or suppliers as well as data related to individual privacy. In addition, there are several other documents that can be accessed in general and reported periodically to relevant government agencies such as RKL-RPL reports, fire management reports, waste management and so on. The information such as reports document must be disseminated through direct delivery to the relevant office, or through the website, for example, for all environmental reports to be uploaded to the website of the Environment Agency and the Ministry of Environment and Forestry through SIMPEL.</p>	
<b>1.1.2</b>	<p>The unit of certification can show evidence that information has been received in an appropriate form and language related to stakeholder involvement, company rights and obligations that are conveyed to all relevant stakeholders, including:</p> <p><b>Compliance with Social and Environmental Regulation</b></p>	



- Evidence of the RKL-RPL Report for Semester 1 of 2022 which was sent to the Environmental Service of Kotawaringin Timur Regency and the Forestry Service of Kalimantan Tengah Province on 25 July 2022.
- Evidence of RKL-RPL report for semester 1 of 2022 to KLHK through SIMPEL which was reported on July 21, 2022 with ID TTE 1658389216-4855.
- Evidence of hazardous waste management reports as well as reports on the results of monitoring wastewater and groundwater in Quarter 2 of 2022 which were sent to the Environmental Service of Kotawaringin Timur Regency and the Forestry Service of Kalimantan Tengah Province on 25 July 2022.
- Evidence of the monitoring report on ambient gas and air emissions for Semester 1 of 2022 which was sent to the Environmental Service of Kotawaringin Timur Regency and the Forestry Service of Kalimantan Tengah Province on January 25, 2022.
- Report on facilities and infrastructure and activities of the Emergency Response Team for the period of 2nd quarter of 2022 which was sent to the Environmental Service of Kotawaringin Timur Regency and the Forestry Service of Kalimantan Tengah Province on 25 July 2022
- Evidence of the management of HCV and protected animals sent to the Kalimantan Tengah Provincial Forestry Office on January 28, 2022.

### **Compliance with Legal, BMP and Worker welfare Regulation**

- A report on the utilization of HGU for the period of 2021 which was sent to the National Land Agency of Kotawaringin Timur Regency on 14 February 2022
- Report of the OHS Supervisory Committee and Work Accident Report for the 2nd Quarter of 2022 which was sent to the Kalimantan Tengah Province Manpower Supervision Center on 25 July 2022
- Evidence of WLTk reporting for the period 2022 – 2023 which was sent to the Manpower Office of Kotawaringin Timur Regency and the Manpower Office of Kalimantan Tengah Province on 12 May 2022.

Based on the results of the document review of all the reports mentioned above, it can be concluded that the mandatory report has been reported to the relevant agencies and uses the Indonesian language. Based on the results of interviews with the local Dinas and village heads around the company, it shows that stakeholders know the type of information available and how to get access to that information, for example, such as outside FFB suppliers, by phone. Other information such as reports must be disseminated through direct delivery to the relevant office, or through the website, for example, for all environmental reports to be uploaded to the website of the Environment Agency and the Ministry of Environment and Forestry through SIMPEL.

#### **1.1.3**

The unit of certification shows the SOP for Communication, Participation and Consultation Number IMS.P-05 revised 4 May 2015 set by the Chief Operating Officer which describes the PIC for handling information, publicly accessible documents, the flow of handling requests for information, and the maximum time limit for responding to information requests which is a month after incoming letter.

The company has recorded every requested information in the logbook of incoming and outgoing mail. Based on document verification, it is known that during 2021-2022 the most incoming letters were requests for funds and assistance. Based on the logbook verification of incoming and outgoing letters, it can be concluded that all incoming information requests have been responded to directly according to the requested date. Records of incoming and outgoing letters are also sufficiently traceable, including the document number, date of receipt and date of response, as well as information regarding the request for information. Based on the results of the verification of the Book of Communication and Request for Information (EMS-F07) document, it shows that for 2022 there are only 2 incoming letters sent from the Environmental Service of Kotawaringin Timur Regency for the company's participation in socialization participants related to river pollution prevention and dissemination of PROPER evaluation results.

Based on an interview with the PIC who handles requests for information, it is stated that the procedures related to requests for information have been periodically disseminated to relevant stakeholders which are carried out in conjunction with the annual SIA review. Based on interviews with the heads of Penyang Village and Rongkang Village, they stated that they had understood the communication and consultation mechanism. Usually, the village head or community will send a letter as a form of communication.

#### **1.1.4**

The certification unit already has a SOP for Communication, Participation and Consultation Number IMS.P-05 revised 4 May 2015 set by the Chief Operating Officer which explains that a letter of request for information that enters the unit is addressed to the manager of the operational unit, which will then be studied and the answer made by the unit. operational unit manager. The procedure



also explains that communication is in oral and written form with the types of communication in the form of complaints, suggestions, requests for information including providing information, reporting, consulting, notifications, instructions, complaints of sexual harassment, invitations etc. Communication sources come from internal and external parties.

The mechanism for providing such information, including information not listed in the above list of documents (such as plasma reports) is regulated in the Communication, Participation and Consultation procedures. Provision of information is carried out by relevant departments such as EHS, Human Resources and CSR with the approval of certain leaders according to their level of authorization. The PIC is responsible for communicating with community leaders, government officials and Services. The company can also show a recording of the socialization of the procedures carried out on November 15, 2021 to 88 participants consisting of workers, contractors, and the surrounding community. In addition, based on interviews with trade unions and the gender committee, it was found that they had a good understanding of communication and consultation procedures.

#### 1.1.5

The company can show an up-to-date list of stakeholders informing internal and external stakeholders updated on 22 September 2022. These stakeholders include government agencies, community heads, cooperatives, local suppliers, contractors, companies around the village, community organizations, trade union organizations, non-governmental organizations, traditional councils, and others. In the current list of stakeholders, names, institutions/positions, addresses, categories, and contact numbers are also explained. Based on sampling for interviews with stakeholders referring to the stakeholder list document, it can be concluded that all contacts listed in the document are still active and in accordance with the data provided.

**Status: Comply**

### 1.2

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

#### 1.2.1

The Company has a Sustainability Policy document for Goodhope Asia Holdings LTA No GAHL.SP.0122 issued on July 28, 2022 which includes the following:

- Ethical Behavior and Fair Working Conditions, i.e., business is conducted with honesty, integrity and openness, respecting the interests of our employees and other stakeholders.
- Policy on labor standards and ethical behavior, namely equal employment opportunities, prohibition of forced, bonded and child labor, complaints and anti-corruption.

This is also stated in the clauses of cooperation with third parties, for example the work agreement for house repairs at Sungai Binti Mill with No. letter E number 38, namely the contractor is obliged to refrain from giving any gifts to directors or employees of the company.

Based on the results of document review and interviews with workers in plantations, factories, and local contractors, it is known that stakeholders understand the company's code of ethics and it is conveyed in Indonesian.

#### 1.2.2

The company also shows the SOP for Communication, participation, and consultation No. IMS.P-05 dated 4 May 2015 which explains the methods of communication, handling internal and external complaints including reporting irregularities.

In monitoring the compliance and implementation of ethical business policies and practices as a whole, the company conducts an internal audit as stated in the internal audit sustainability procedure with No. IMS.P-13 revision 2 which was approved by the COO on 6 May 2019, was last implemented on 12-16 September 2022.

The results of interviews with employees, for example with probation workers in the harvesting activity of Block L5 Division 3 Sawahan Estate, it was stated that in the recruitment of workers there were no costs incurred by prospective workers and the recruitment stages started from application for job applications, health checks, selection to a probationary period.

**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

Unit certification has complied with all applicable local, national and international laws and regulations which can be proven from a few documents as follows:

##### **Compliance with Social and Environment Regulation:**

- Environmental Impact Analysis (ANDAL) document for the development of plantations and oil palm processing mills in 2006 with the scope of the study, namely oil palm plantations covering an area of  $\pm 13,930$  ha and processing plants of 90 tons FFB/hour.
- The 2006 ANDAL document has also been approved based on the Decree of the Regent of Kotawaringin Timur Number: 03/Komisi-Kotim/VIII/2006 on August 7, 2006 with the condition that it is mandatory to carry out environmental management and environmental monitoring and report every 6 months to the Environmental Impact Management Agency. Life and the Regent of Kotawaringin Timur and related agencies.
- The 2021 ANDAL & RKL-RPL addendum document was carried out due to the initiation of the Biogas Plan development with a capacity of 1.7 MW on an area of 231.25 m<sup>2</sup>. The addendum has been ratified based on the Decree of the Kotawaringin Timur Regent with document number 188.45/501/Huk-DLH/2021 on December 30, 2021.
- The ANDAL Addendum Document has also obtained approval from the Kotawaringin Timur Regent in the form of Environmental Permit Document Number 188.45/501/Huk-DLH/2021 dated December 30, 2021 regarding Changes in Environmental Feasibility, Plantation Activities and Palm Oil Processing Factory with a land area of  $\pm 13,930$  Ha, a factory capacity of 90 tons of FFB/hour and a Biogas Plan with a capacity of 1.7 MW.
- The company has a permit for temporary storage of hazardous waste based on DPMPTSP Decree of Kotawaringin Timur Regency Number 011/DMPPTSP-PT/LB3/II/2021 which was legalized on February 3, 2021 and is valid for 5 years.
- The company already has a Palm Oil Industrial Wastewater Utilization Permit on Soil in an Oil Palm Plantation based on DPMPTSP Decree of Kotawaringin Timur Regency Number 54/DPMPTSP-PT/LA/X/2019 which was ratified on October 9, 2019 valid for 5 years with a land area of allowed for an application area of 600 Ha.
- The company already has the results of HCV identification conducted by the Bogor Agricultural University (IPB) Team with a drafting team that has been RSPO Approve Assessor in August – September 2009 with the identification of an HCV area of 599.48 Ha.
- The company already has an Operational Eligibility Letter for Domestic Wastewater Disposal to the Surface Water Agency based on DPMPTSP decision Number 02/DPMPTSP-PT/SLO/II/2021 which was legalized on January 18, 2022.

The company does not yet have a Surface Water Utilization Permit, but has carried out the permit processing process as evidenced by the Certificate Number 208/KET/BWS24/2022 dated October 1, 2022 issued by the Ministry of PUPR which states that the company has carried out the process of obtaining a Technical Recommendation for a Resource Concession Permit. Water since August 30, 2021 and has fulfilled all the required documents, but the permit has not been issued due to obstacles from the ministry. Based on this, the company has improvement opportunities to speed up the process of obtaining surface water utilization permits and documenting the entire management process. **(OFI)**

##### **Employment Regulation:**

The company sets a minimum wage of IDR 3,014,733 or a daily wage for daily Fixed Period Working Agreement of IDR 120,589 and SKU-H of IDR 115,489 which is in accordance with the Decree of the Governor of Kalimantan Tengah Number 188.44/445/2021 dated November 30, 2021 regarding the minimum wage for Kotawaringin Timur Regency in 2017. 2022.

##### **OHS Regulation:**

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

##### **BMP Regulation:**

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

### Legal Regulation:

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

#### **2.1.2**

Procedure of legal requirement is listed in document SOP EHS Legal and Other Requirements No. IMS.P-02 dated 04 Mei 2015. The procedure explains the person in charge for managing the regulation and update the regulation. EHS team will update the regulation whenever there is new regulation related to company activity, at least once a year. The latest evaluation has been done by company on 1 April 2022, which included latest regulation such as: Government Regulation No. 6/2021, Government Regulation No. 10/2021 and Government Regulation No. 22/2021.

To ensure compliance for contractor/third parties, the certification unit always requests the requirements for the completeness before the contractor does / starts work. The results interviews with contractor revealed that workers had received wages accordance with the minimum wage, were registered in the BPJS program, have a legality document, and the worker have been given the standard PPE. This result is in line with the results of the document review which proves that the wages of contractor workers are above the minimum wage, fulfilling tax payments, BPJS, standard PPE and other requirements

#### **2.1.3**

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

The company has a map that showing the location of the boundary poles in each estate. The company has also monitored HGU boundary pole in April 2022 by showing the results of monitoring, all HGU pole is in good condition with accordance with the procedure. The results of field observations on the boundary pole for example No. AB009, AB010 and AB011 in Tanah Putih Estate and No. AB031 and AB071 in Sungai Lenggana Estate are found and that the condition of the boundary poles is well maintained.

**Status: Comply**

### **2.2**

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

#### **2.2.1 and 2.2.3**

The company has a list of contractors included in the stakeholder list which was updated on October 1, 2022 which consists of estates, namely 6 FFB and EFB transporters, 1 EFB application and 1 laterite transport as well as for Mill, namely 1 biogas maintenance, 1 KCP maintenance, 1 installation new weighbridge, 1 EFB Shredder Systems, 1 home repair, 6 CPO transporters and 2 PKE transporters. The list of stakeholders provides the name of the agency, contact name, field of cooperation, address and contact number.

The company also shows one of the agreements with contractors which contains clauses regarding legal compliance obligations, for example a house repair work agreement at Sungai Binti Mill with No. PKS/SBM/Perbaikan Perumahan Staff/I/2022/003 which in the agreement has explained the terms, General provisions and obligations that apply to contractors are:

- In letter A point 7, the contractor is required to register all jobs/ employees/ contractors/ agents/ representatives with Social Security Agency.
- In letter A point 9, the contractor will not employ workers/employees/contractors/agents/representatives under the age of 18 years and may not be involved in any labor trading activities.
- In letter B point 27-point b, the contractor is obliged to provide PPE for employees/contractors/agents.
- In letter E point 41, the contractor must comply with applicable laws and will not violate state laws or regulations, including the law on human rights.

#### **2.2.2**

All contracts, including for the supply of FFB, contain specific clauses to meet relevant legal requirements and these can be demonstrated by third parties.

The company has a list of contractors for the 2022 period consisting of 6 CPO carriers, 2 PK carriers, 10 external FFB suppliers, 1 EFB application contractor, 1 infrastructure development contractor and others whose contracts contain special clauses to meet relevant legal requirements. In this audit assessment, verification of the findings in the previous assessment has also been carried out. The company shows a checklist for evaluating regulatory compliance with third parties and evidence of compliance, for example shown in:

- Cooperation on the transportation of CPO and PKO between PT Agro Bukit and PT Jaya Harapan Nusa Sejahtera which has included special clauses to meet relevant legal requirements and evidence of compliance such as work agreement Fixed Period Working Agreement employees, payment of wages that are in accordance with the district minimum wage, payment and registration of Social Security Agency Employment, socialization related to OHS, etc
- Cooperation in the transportation of stones for road paving between PT Agro Bukit and CV Berkat Mentaya which has included a special clause to meet relevant legal requirements and proof of compliance such as work agreement Fixed Period Working Agreement employees, payment of wages that are in accordance with the district minimum wage, payment and registration of Social Security Agency Employment, related socialization OHS, etc

In relation to minor non-conformities in the previous assessment that have not been met, then based on the above, the fulfillment of non-conformities in this indicator has been fulfilled.

**Status: Comply**

### 2.3

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

#### 2.3.1

During onsite assessment, the results of verification of documents such as weigh tickets, letters of introduction to FFB, basic info and interviews with management representative are known that direct FFBs supplier that enter the Sungai Binti Palm Oil Mill are sourced from own estates (PT Agro Bukit) and other parties such as collector (PT Borneo Lancar Abadi, PT Mitra Bumi Borneo, CV Sinar Mentari and CV Naura Cemerlang) and independent smallholder (Roy Lumban Gaol and Gunawan). The supplier list record shown to the auditor contains detailed information on suppliers such as address, location coordinates, telephone number, area and legality. This information contains all FFB suppliers originating directly or indirectly (as explained in indicator 2.3.2)

#### 2.3.2

The company has also shown details of suppliers that are not directly received by the factory or through a collecting agent, for example:

Smallholder Name	Area (ha)	Address	Latitude	Longitude	Legality	Collector
Buray	1 ha	Jl. Jendral Sudirman Km 29	-2.49208	112.7569	SHM	CV Dinaya Mulya
Sumidi	4 ha	Jl. Jendral Sudirman Km 32	-2.47752732	112.7345393	SHM	PT Mitra Bumi Borneo
H jito	5 ha	Jl. Sudirman Km 32	-2.48076996	112.7390948	SHM	PT Mitra Bumi Borneo

The recording contains the same information as direct FFB suppliers, such as farmers' addresses, location coordinates and also land ownership status.

Based on interview with weighbridge operator, the information that the FFB supplier is still in accordance with the FFB supplier list document received by the factory.

**Status: Comply**

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

### 3.1

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

#### 3.1.1

Unit Certification has long-term production projections contained in the 3-Year Long-Term Plan in PT Agro Bukit's Mill Production Budget Document starting 01 April 2022 – 31 March 2023, 1 April 2023 – 31 March 2024, and 1 April 2022– 31 March 2025. Document The long-term plan contains projected area statements, FFB projections for Estate, Plasma FFB, and external FFB, processed FFB,

CPO production (certified and non-certified), PK production (certified and non-certified). The company shows a long-term plan for the period 2022-2025.

**Mill Production Budget data for the 2022-2025 period, including the following:**

ITEM	2022 – 2023	2023 – 2024	2024 - 2025
Seeds	-	-	-
Production of certified FFB (MT)	294.000,00	309.701,00	301.993,00
Production of non-certified FFB (MT)	123.500,00	129.303,00	133.080,00
OER (%)	19,42	19,42	19,42
KER (%)	4,68	4,69	4,69
CPO Production (MT)	89.095,00	93.683,00	92.845,00
PK Production (MT)	21.501,00	22.609,00	22.406,00
Replanting Program	-	-	-

Based on information from the results of the document review and interviews with the management unit, the company has a management plan with a timeframe of at least three years, which is documented and includes the feasibility of a jointly developed business for nucleus plantations and plasma smallholders.

### 3.1.2

Based on information from the results of the area statement document review and interviews with the management unit that the company (Sungai Binti Estate, Tanah Putih Estate, Sungai Lenggana Estate and Sawahan Estate) has not yet planned a replanting plan program in 2022 until 2027 due to data on oil palm planting starting in the period 2005 – 2012, so that the age of the oldest plant is 17 years which at this time has not met the replanting age, namely the minimum age of oil palm plants is 25-30 years.

### 3.1.3

Based on the information from the document review that the company has conducted the 15 th Meeting Management Review of PT. Agro Bukit, which was held on February 3, 2022, attended by GM, PM, Manager, and related staff. The company also shows the minutes and records of these activities, which discuss:

- Review previous Minutes of Meeting
- Objectives Target & Management Programs
- Results of Internal Audit & Status of corrective and preventive actions
- Environmental & OHS performance
- Status of Accidents investigation
- Evaluation of compliance
- Communication, Complaints, Participation & Consultation
- Changing circumstances, including developments in legal and other requirements related to sustainability standards such as RSPO, ISPO, ISCC, HAS 23000, environmental & OHS aspects
- Review Sustainability Policy
- Recommendations for improvement
- Output of Management Review Meeting

Some examples of discussions on several agendas include:

- Review previous Minutes of Meeting

Pending Issues	Update Status	PIC and Time Line
Construction of Water Treatment plant (WTP) at Emplacement H8	Original plan of construction was in Q1, it was changed to Q4 due to the contractor has changed the price from IDR 900 million to 1.3 billion	General Manager Q4 of FY 2021/2022

- Environmental & OHS performance
  - a. Environmental performance

- Outlet parameter of Palm Oil Mill Effluent (POME) has complied with Legal requirements (KEPMENLH No. 28/2003 for Land application)
- Air emission Quality especially at boiler and generator have complied with a legal requirements (PERMENLH NO. 07/2007 Appendix 1)
- Air Ambient Quality at PT AB has complied with a legal requirement (PPRI No. 41/1999 & KEEP. 50/MENLH/XI/1996)
- Noise ambient level at PT AB Emplacement has complied with a legal requirement (KEP-13/MENLH/3/1995)
- b. OHS performance
  - Safety index was surged to 4.98, The target was 2.5. PT Agro Bukit has not achieved the target due to fatality accident happened at tractor activities. The driver suspected has health problem and collapsed on the way home to his barracks. However, Management has provided and implemented preventive action to prevent the same case.
  - Mitigation efforts had been made to prevent land fire incidents. Management has invested more fire equipment's, fire towers and capacity training for emergency response team. As a result, PT Agro Bukit has achieved Zero fire incidents in FY 2021/22.

- Review of Sustainability Policy: Current Sustainability policy is still relevant; the latest revision was in 2020

- Recommendations for Improvement

The following are several recommendations that have been implemented strictly by PT Agro Bukit:

- Reinforce workers discipline for full compliance with safety standards
- Be focus on shifting the safety culture of the employees without exception from reactive to anticipative. New initiative needs to be promoted to attract the employees participation, safety index should be no more than 2.5.
- Increase workers Participation on incident/accident prevention programs thru safety hazard observation reports.
- Reinforce EHS committee roles & responsibilities. Implement EHS committee program as scheduled to monitor EHS compliance
- Health performance data must be compared with Ministry of Health data/report
- Enforce HoDs for creating more safety innovation
- To keep maintain BoD5 level of POME maximum at 2,000 mg/LT/month

- Output of Management Review Meeting

Management PT. Agro Bukit has committed to improve the gaps as needed. Detail output of management review meeting are available on the document of Objective Target Program FY2022/2023

Based on information from the results of the document review that the company has carried out a management review within the planned time in accordance with the scale and nature of the activities carried out which are recorded and documented.

**Status: Comply**

### 3.2

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

#### 3.2.1

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

#### **Social and Environmental Aspect**

- The company no longer uses pesticides with the active ingredient paraquat.
- The company has implemented biological pest control in this case by using host plants and owls to reduce the use of pesticides, especially insecticides and rodenticides.
- Management and monitoring of fires in company border areas that benefit the community.
- The use of renewable energy accordance to reduce the use of fossil fuels.



- Waste management and monitoring through WWTP pond management, testing the quality of the effluent and reporting it to the Environmental Agency.
- Air quality management and monitoring through several action like road maintenance, air quality testing, routine maintenance of vehicles and machines and vehicle upgrades.
- Management and monitoring of surface and groundwater through testing the quality standard.
- Green House Gas Management and using land clearing with mechanical and zero-burning policy.
- Has the initiative to use renewable energy-producing technology, namely methane capture or a biogas plan which is currently under construction.
- Company is in the stage of developing a biogas plan to reduce GHG and use renewable energy.

### **Best Management Practices Aspect**

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

- The company provides house rinse and house washing equipment and spray PPE. This is in order to minimize chemical contamination of the environment and the company's strong commitment to the motto of going to work clean and coming home from work clean.
- The company has conducted an Early Observation System (EWS) detection check for pests and diseases and the HDI Census is conducted every month.
- The company controls the horn beetle (*Oryctes rhinoceros*) by using a pheromone trap.
- Biological control of oil palm leaf-eating caterpillars by planting and maintaining (conserving) host plants for natural enemies of leaf-eating pests, such as *Antigonon leptosus*, *Cassia cobanensis* and *Turnera subulata*.
- The company no longer uses a limited pesticide with the active ingredient Paraquat.
- The company has monitored TMAT including Subsidence Pegs, Pziometer, Water level which is carried out every month.
- The company uses the Barn Owl Box in terms of handling the control of Rat Pests and monitoring the maintenance every month.
- The company has planted a beneficial plant that is well maintained by monitoring it every month.
- The unit of certification re-uses palm oil waste such as empty fruit bunches, Liquid Waste (LA).

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

### **3.2.2**

The company has shown the auditor regarding the RSPO metric template Version 2.1 that has been filled in according to the facts and data (Period January to December 2021) in the company's record documents, such as the number of workers, the area of production to the record of work accidents. Based on team auditor's review, the information has been matched with others document, such as supply chain record, demographic workers, work accident, etc.

**Status: Comply**

### **3.3**

**Operating procedures are appropriately documented, consistently implemented and monitored.**

#### **3.3.1**

The Certification Unit already has SOP procedures on Mills and Plantations which are contained in the Standard Operating Procedures (SOP) for Palm Oil Plants and Mills issued by PT. Agro Bukit in May 2010. This procedure is available in Indonesian and is maintained at the plantation and mill offices. SOPs are written in Indonesian and stored in the Agronomy section of PT. Agro Bukit, which is also available at POM Estate and Sungai Binti units. The company has shown SOP documents that have undergone the latest revisions for the 2019-2021 period, including:

- Agronomy SOP with the name Agronomy Policy Document which was revised in March 2019 and signed by the Agronomy Advisor which consists of 26 Chapters, some examples of contents in the Agronomy Policy Chapter include Seedling Techniques, New Planting, Estate Road Systems, Water Management in Mineral Soils, Planting Density, Soil and Water Conservation, Legume Cover Crops, Planting Techniques, Ablation, Harvesting, Yield Projection, Pruning, Fertilization, Fertilizer Sampling, Leaf and Rachis Sampling, Oil Palm Census, and others.
- SOP for FFB Processing, with the name Mill Policy Document which was revised July 2021 Revision No: 004/SOP/ABM-21 and signed by Senior. Mill Manager which consists of 12 Chapters, some examples of contents in the Chapter of Sungai Binti POM

Policies include Loading Ramp, Sterilization Station, Threshing Station, Pressing Station, Clarification station, Nut Station, Water Treatment Plant, Boiler Station, Engine Room, Effluent Treatment Plant, and Boiler Station-Pipe Hydro Testing

Based on information from document review, field observations and interviews with management units including workers in POM (Sortation, Loading ramp Station, sterilizer, Press, Thresher, Engine Room and Boiler, etc.) and For Estate (Harvest Activities, weeding plants, Loading FFB, Chemist, and fertilization, etc.), that the SOP is appropriate and adequate to cover all plantation and mill processes and activities, it is known that workers have been able to explain/explain their duties and responsibilities, understand technical work, use PPE, and first aid in accidents.

### 3.3.2

Based on information from the results of document review, interviews from the management unit that the company has carried out activities in carrying out routine inspections consistently. Some examples of these activities that are carried out every year include:

- Activities in ensuring the mechanism carried out by the company has been carried out properly, in checking the consistency of the implementation of procedures in the certification unit, among others, the company conducts an internal audit as stated in the internal audit sustainability procedure with No. IMS.P-13 revision 2 which was approved by the COO on 6 May 2019, the last time it was carried out on 12-16 September 2022 with the initials SB as Lead Auditor. In this activity, it was concluded that there were 5 minor observations and 30 observations. Furthermore, all non-conformances have been taken with the latest corrective action on October 1, 2022.
- Company has presented the document for the 2022 plantation management system Management Review Meeting which was held on 3 February 2022 and was accompanied by a list of attendance that followed 19 participants in the Manager's Meeting Room.
- Company also has an internal audit mechanism in the context of implementing Agronomy and Factories contained in the Management Review Meeting. This is done to the company's internal and external companies (stakeholders and contractors) by the certification unit for the period of 2022

In addition, the company also has SOPs that serve as guidelines for implementing, monitoring and evaluating agronomic recommendations. Based on information from interviews and document reviews, the management unit provides a mechanism to check the consistency of the implementation of procedures. Each unit has documented the operational activities of the plantation and factory products such as daily reports, supervisors' workbooks, etc. The field visit to the factory showed that the unit had documented daily activities in daily production reports which were documented using a computerized system.

### 3.3.3

Company has shown a recorded document of monitoring and follow-up activities carried out every month and year, some examples of monitoring and follow-up documents that have been carried out by the company include:

- Company has documented the Form field inspection for harvesting activities that must be carried out by the Harvest Foreman and Assistant every day, after harvesting activities.
- Company has carried out EWS detection checks and HDI censuses conducted by Sungai Binti Estate and Tanah Putih Estates, Sungai Lenggana and Sawahan Estate every month.
- Company has documented reports on plantation operational activities such as daily reports, supervisors' workbooks, etc. Field visits to plantations showed that the unit had documented daily production report activities which were documented using a computerized reporting system.
- Company has documented the monthly beneficial plant inspection activity reports.
- Company has shown the document of the 2022 plantation management system Management Review Meeting which was held on 3 February 2022 and was accompanied by a list of attendance that followed 19 participants in the Manager's Meeting Room which was attended by the GM, PM, Manager, and related staff, one of which discussed the results. of Internal Audit & Status of corrective and preventive actions

Company has carried out RSPO Internal Audit activities to ensure the consistency of the implementation of procedures, which are contained in the internal sustainability audit procedure No. IMS.P-13 revision 2 which was approved by the COO on 6 May 2019. The Certification Unit has carried out RSPO internal audits of the Sungai Binti POM in the 2022 period, the last activity was carried out on 12 -16 September 2022 by SB initials as Lead Auditor and 18 other people as auditors. In this activity, it was concluded that there were findings of 5 minor discrepancies and 30 observations. Furthermore, all non-conformances have been corrected, the latest being on October 1, 2022. When the RSPO internal audit was carried out on October 10 - 14, 2022, it was discovered that all non-

conformities had been met and a record of compliance with the non-conformities could be shown.

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

#### Environmental Impact Assessment (EIA)

The certification unit already has an Environmental Impact Assessment (EIA) document that covers all areas that fall within the scope of certification and can be proven based on the following documents:

- Environmental Impact Analysis (*ANDAL*) document for the development of plantations and oil palm processing mills in 2006 with the scope of the study, namely oil palm plantations covering an area of  $\pm 13,930$  ha and processing plants of 90 tons FFB/hour.
- The 2006 *ANDAL* document has also been approved based on the Decree of the Regent of Kotawaringin Timur Number: 03/Komisi-Kotim/VIII/2006 on August 7, 2006 with the condition that it is mandatory to carry out environmental management and environmental monitoring and report every 6 months to the Environmental Impact Management Agency. Life and the Regent of Kotawaringin Timur and related agencies.
- The 2021 *ANDAL & RKL-RPL* addendum document was carried out due to the initiation of the construction of the Biogas Plant with a capacity of 1.7 MW on an area of 231.25 m<sup>2</sup>. The addendum has been ratified based on the Decree of the Kotawaringin Timur Regent with document number 188.45/501/Huk-DLH/2021 on December 30, 2021.
- The *ANDAL* Addendum Document has also obtained approval from the Kotawaringin Timur Regent in the form of Environmental Permit Document Number 188.45/501/Huk-DLH/2021 dated 30 December 2021 concerning Changes in Environmental Feasibility, Plantation Activities and Palm Oil Processing Factory with a land area of  $\pm 13,930$  Ha, a factory capacity of 90 tons of FFB/hour and a Biogas Plant with a capacity of 1.7 MW.

In the document above there is information related to environmental aspects and parameters that must be monitored and managed along with information on targets and implementation times contained in the UKL-UPL matrix. The document has also covered all aspects of plantation and mill activities as well as their changes throughout the operational activities. The sampling methodology used was also participatory involving groups of external stakeholders aimed at identifying impacts, including the Local Government Office, the Head of Mentawa Baru and Mentaya Hilir Utara, as well as the Head of Sawahan Village on April 1, 2006. Based on the verification of the document it can be concluded that all environmental impacts from plantation activities have been identified and their management recommended with reference to relevant laws and regulations.

#### Social Impact Assessment (SIA)

The certification unit has conducted a Social Impact Assessment (SIA) which was carried out in 2011 by the Consultants of the Faculty of Forestry, IPB. The SIA study was conducted on 14 – 27 August 2011 covering the entire management area of  $\pm 13,930$  Ha. This study explains the impacts arising from plantation activities, such as decreasing water quality, increasingly consumptive community behavior, land conflicts, changes in livelihood patterns and social disparities between indigenous people and migrants. Social impact assessments are included as part of the complement of all environmental impact assessments. The assessment involved all affected parties, both internal and external stakeholders, including employees, trade unions, Natai Baru and Penyang villagers, government agencies, local NGOs and members of plasma cooperatives. Evidence of participation with affected parties is shown in the form of attendance at FGD meetings and photos during interviews. The report also contains recommendations for Social Management and Monitoring that have been identified.

The types of data collected are primary data and secondary data. Primary data collection for monitoring the management of social impacts is obtained from relevant stakeholders as affected parties as well as local village officials who represent the community and as verifiers. Secondary data or indirect data collection is carried out by means of literature studies through various references such as environmental assessment documents, HCV study results documents, local government literature, CSR implementation records, company internal data, correspondence between companies and affected parties, local news and news. national and so on. All of these data sources are used as consideration for social impact management recommendations. Based on the verification of these

documents, it can be concluded that all social impacts from plantation activities have been identified and their management recommended with reference to relevant laws and regulations.

#### **High Conservation Value Assessment (HCVA)**

The certification unit has also conducted studies related to areas with high conservation value as evidenced by the 2009 HCV Study Results document conducted by the Faculty of Forestry, IPB. The HCV assessment was carried out in August – September 2009 covering the entire scope of the management area of **±13,930 Ha**. This study explains the impacts arising from plantation activities on the environment, social, and protected flora and fauna. The HCV assessment also involves several affected parties, both internal and external stakeholders. Evidence of participation with affected parties is shown in the form of attendance at FGD meetings and photos during interviews. The report also contains a matrix of High Conservation Value Area Management and Monitoring Plans which contains recommendations for the management of all identified HCV areas.

Based on the results of the study of the 2009 HCV identification document, information was obtained that the impact assessment on HCV, biodiversity and RTE species carried out also included areas outside the concession boundary. The area of HCV that is included in the scope of certification is **599.48 Ha** which consists of protected areas for flora and fauna, river borders, and critical land areas in the form of heath forest. Based on the verification of these documents, it can be concluded that all areas with high conservation potential and protected areas have been identified and their management recommended with reference to the relevant environmental management guidelines.

#### **3.4.2**

The certification unit has made efforts to manage and monitor social and environmental impacts that are carried out independently by involving affected stakeholders. Some evidence of documentation of activities that have been carried out are as follows:

#### **Environmental Impact Assessment (EIA)**

Based on the results of the verification of the RKL-RPL document for Semester 2 of 2021, it can be concluded that all the management and monitoring parameters requested in the environmental document matrix have been implemented. The certification unit has also evaluated every parameter of significant impact monitoring carried out as required in KepmenLH 45 of 2005, which includes evaluation of trends, evaluation of critical levels, and evaluation of compliance. Based on the evaluation results, it is known that all parameters are still in accordance with the related Quality Standards, and there is no indication of environmental pollution in the area around the company. The effectiveness of environmental management and monitoring can be seen from the results of the analysis and the compatibility between the management and monitoring plans and their implementation in the field. Several things can be concluded from the results of the review of the RKL-RPL document for Semester 1 of 2022, including:

- Environmental Management and Monitoring of physical and chemical components, ambient air quality, noise, and river water quality has been carried out, and for parameters above quality standards such as surface water quality, the company has shown the justification.
- Preventing soil, water and air pollution by reducing the use of chemicals, managing waste properly and complying with proper waste disposal in each area.
- Carry out efforts to save the environment by protecting areas important for environmental sustainability such as river borders.
- Manage and monitor the impact of potential land fires.
- Utilizing solid waste from palm oil mills as a substitute for fertilizers and fossil fuels.

This can also be proven from the results of field visits to EFB storage areas, WWTP areas and Land Application areas as well as river border conservation areas. The results of interviews with communities around the company also stated that they did not feel any environmental impacts related to the company's operational activities. The company has also carried out environmental management in accordance with the RKL-RPL by installing signboards for conservation areas, markings 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 fertilization officers, they also stated that they were aware of the prohibition on the use of chemicals in the buffer zone marked in red. In addition, they do not use chemicals when they are close to water bodies such as canals, reservoirs or artificial ponds connected to rivers with a 1-tree boundary from a ditch.

The unit of certification has also made an *RKL-RPL* report every semester which refers to the environmental management and monitoring matrix. Environmental management reports are carried out every 6 months and submitted to the relevant agencies, for example the *RKL-RPL* Report for Semester 1 of 2022 which is sent to the Environmental Agency of Kotawaringin Timur Regency and the Forestry Service of Kalimantan Tengah Province with proof of receipt dated July 25, 2022 which is accompanied by a stamp,

signature and name of the recipient as well as proof of document delivery. Based on the results of interviews with the Environmental Service regarding reporting on the implementation of the *RKL-RPL*, the certification unit routinely does this and up to the time the audit was conducted there were no complaints or conflicts related to the environment from NGOs or local communities around the company.

### **Social Impact Assessment (SIA)**

The results of the 2011 SIA study are used as a guide in the preparation of social impact management programs which are updated annually, for example, the SIA Action Plan document for Period VIII (April 2022-March 2023). The document contains 23 social programs that will be carried out simultaneously and continuously with the following objectives:

- Resolve tenure issues around the company.
- Improve plasma performance.
- Socio-economic empowerment of the community.
- Improving the quality of public education.
- Counseling and improving the quality of public health.
- Build communication and network with all stakeholders related to PT. Agro Bukit.
- Reduce water pollution of rivers and lakes and increase the availability of ground water.
- Carry out improvements in the manpower sector.

Program planning is carried out based on the results of Focus Group Discussions which have been conducted periodically since the previous 2 periods, namely 2020 and 2021, involving stakeholders including the surrounding village community as well as the results of potential and risk analysis. The program is a general plan that will be implemented by the company based on stakeholder needs analysis and stakeholder mapping related to the 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.

The company also evaluates the Management Plan annually to monitor the progress of program management, for example, there are programs that need to be stopped, continued or added. The evaluation of the management plan refers to the SIA Action Plan Report and Review Period VII (April 2021 – March 2022) which is prepared annually as carried out on April 3, 2022. Based on the results of the verification of the document, it can be concluded that all activities listed in the Action Plan SIA has been implemented and is still continuing. The document also includes social programs to avoid/mitigate negative social impacts, partnership programs for farmers, human rights, CSR programs, gender equality, education and public health.

Based on the results of consultations with worker representatives, there is no form of discrimination against workers, no underage workers were found, the company has also 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, public facilities. educational infrastructure (schools), and other facilities. The company also allocates resources for the maintenance of the entire facility. The resource persons also stated that they can voice their views through their own representative institution or a spokesperson they choose in the evaluation activities to review and develop mitigation plans, as well as monitor the success of the implemented plans.

Based on the results of field visits and external stakeholder interviews related to the management of social impacts carried out by the company for the period of 2022, it can also be concluded that there are no issues related to social impacts that have not been identified by the company. all potential social impacts have been managed and included in the Action Plan, which is still being managed. such as holding regular meetings with all stakeholders, evaluating waste management and repairing and maintaining facilities, conducting health checks, making education development plans, helping with electricity supply, road repairs and others.

### **3.4.3**

The unit of certification has made efforts in implementing the management and monitoring of social and environmental impacts as described in indicator 3.4.2. In addition, the certification unit also makes efforts to periodically update the management in a participatory manner. Some documentary evidence of the efforts that have been made are as follows:

### **Environmental Impact Assessment (EIA)**

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



advice and advice in carrying out environmental management in accordance with the vision, mission and government programs so that they can run synergistically. Monitoring and updating related to environmental impact management is also carried out in conjunction with an evaluation of HCV management which is described in more detail in indicator 7.12.4. However, in general, all recommendations from the evaluation of HCV management carried out in a participatory manner will be carried out in line with the management and monitoring of environmental impacts.

### **Social Impact Assessment (SIA)**

Based on the analysis of the SIA Action Plan document for the period VIII April 2022 – March 2023, the social impacts in this assessment are divided into positive impacts, and negative impacts. The social impact assessment is carried out based on the perceptions of community representatives at the assessment location who represent the community. the 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. The company conducts annual evaluations to harmonize data collection related to community perceptions regarding the SIA Action Plan and adjust it to the latest needs according to conditions in the field. Several things were obtained based on the results of the annual evaluation conducted on April 3, 2022, including:

- Documentation and data collection of Land Tenurial that have not been structured.
- Low education and competitiveness.
- Low mastery of agricultural cultivation techniques.
- The decline in the function of the river due to pollution.
- Limited capital and still lack of business opportunities.
- Job promotion at PT Agro Bukit for local residents is still low.
- Limited clean water and poor environmental sanitation.
- Electricity facility from biogas which is being developed.

Based on the results of the verification of the document, it shows that all social management and monitoring plans that have been implemented and monitored are then updated periodically in a participatory manner by accommodating the aspirations of stakeholders. The evaluation activity is also carried out to prepare the SIA program which will be carried out for the next 1-year period. The company applies the 7 principles of the RSPO regarding the development of socially and environmentally responsible plantations with reference to the Free, Prior, Informed and Consent (FPIC) Principles. The principle of FPIC which is the basis for the company in carrying out the process of developing oil palm plantations, among others, involves women's representatives, village heads, community leaders, land owners around the company's area, plasma and independent smallholders, and all affected parties. The result of the meeting was that there were positive impacts felt by the community, such as the establishment of the Plasma Cooperative, job opportunities, easier accessibility, business opportunities and the village became more crowded. However, there is also a negative impact that is most felt, namely that it is still not optimal in accepting labor for the community around the company.

Based on the explanation above, it can be concluded that the company has made efforts to update the social and environmental management program periodically with clear and accountable evidence.

	<b>Status: Comply</b>	
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### **3.5**

#### **A system for managing human resources is in place.**

##### **3.5.1 and 3.5.2**

The company has a Human Resources System as follows:

- Work Instruction Recruitment No. 01/HR-WI/09, 29 January 2012 which explains that the selection process includes interviews, administration, identity cards, curriculum vitae and MCU and if they meet the requirements, HR will issue a contract/agreement letter.
- Company regulations for the period 2021-2023 which explain the human resource system, for example:
  - Article 5 regulates the terms of acceptance of workers.
  - Article 12 regulates the assessment of workers.
  - Article 13 regulates the terms of promotion.
  - Article 15 regulates the retirement age.
  - Article 70 regulates the termination of employment.



- The company has a document of Ethical Behavior and Employment Standards Policy Goodhope Asia Holdings LTA No GAHL.SP.0322 issued on July 28, 2022 which includes for example the following:
  - Maintain a work environment that is free from discrimination and promotes fair and impartial care for all individuals regardless of gender, race, age, disability, religion, nationality or sexual orientation.
  - Prohibit all forms of forced, trafficked or child labour.

The company has shown a record of the implementation of employment procedures that have also complied with the provisions of the regulations. The types of work arrangements in the company are permanent workers (Daily unit payment and Monthly unit payment) and daily workers.

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

### Recruitment

The company processes employee recruitment from application until prospective employees undergo a probationary period, for example the company shows an application letter on behalf of the initials DE which was sent on May 15, 2022 to apply for the cleaning gang position, then the company conducts a test interview and interview on June 4, 2022 with the results it is recommended to pass and will undergo the next stage, namely a health examination. After being declared to have passed the medical examination, personnel with the initials DE signed a work agreement on July 12, 2022 with a probationary period of 3 months. In the recruitment process, the company finances the stages carried out by prospective employees and prospective employees are free of charge.

### Promotion

A letter regarding the appointment of permanent employees dated April 27, 2022, which was signed by the Director, namely personnel with the initials W who had carried out a probationary period from January 21, 2022 – April 20, 2022, declared their status as permanent employees in the position of Senior Assistant starting from April 21, 2022.

Status: Comply

## 3.6

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

#### 3.6.1

Certification Unit has demonstrated a policy related to OHS that has been approved by the Chief Operating Officer, on May 30, 2017, which explains that the company is aware that all activities of developing oil palm plantations and managing crude palm oil production can have an impact on the environment, health and safety risks. employees, contractors and visitors. In an effort to manage the impacts and risks of activities, the company is committed to:

- Applying the principles of sustainable development by considering environmental, occupational health and safety, social and economic issues in every decision making
- Protecting the environment including preventing pollution to the air, soil and water through waste reduction, reuse and recycling programs
- Prevent injuries and illnesses caused by working conditions
- Comply with environmental laws and regulations, OHS, as well as other relevant provisions and requirements that apply
- Establish and review objectives, targets and programs to improve environmental performance, OHS
- Carry out accident investigations and carry out audit programs for each accident case that occurs to ensure continuous improvement
- Provide adequate resources to implement this policy
- Provide appropriate information, instruction and training to ensure all employees and contractors are aware of their environmental obligations.
- Communicate this policy to employees, contractors and suppliers and make it available to interested parties
- Continuously improve the performance of the OHS management system and the environment.

Company has documented risk assessment activities carried out for all operations, processes, and activities carried out by the company (Estate and Mill) where health and safety are a problem by monitoring each activity and reporting on a monthly basis. All precautions attached to the product have been properly observed and applied to factory and estate workers.

Company has established Standard Operating Procedures regarding mitigating OHS problems in all aspects of workers both at Estate

and Mill, including SOPs for Accident First Aid and SOPs for Personal Protective Equipment. In addition, the company has also prepared OHS Committee programs, such as routine OHS Committee meetings, HIRAC evaluations, employee periodical MCU, FR/SR work accident data, OHS Committee quarterly reporting and others.

Company has a Risk Management document for the Mill which is prepared by the Mill Manager, reviewed by the EHS Assistant Manager and EHS Manager. The document describes the activities at each station, the risks, dangers, and control measures, starting from the stew station, seed mill station, clarification station, hoisting crane station, sewage pond, chain station, press station, engine room, steam boiler station and so on. other. The document was revised again on April 4, 2022.

Company has a Risk Management document for Estate (SLE, TPE, SBE, SWE) prepared by the Estate manager, reviewed by the EHS Assistant Manager and EHS Manager. The document describes the activities of Estate Area conditions, land development, road construction, conservation area management, use of polybags, watering plants, fertilizing, controlling weeds and pests, using pesticides, planting oil palm seedlings, applying fertilizers, applying empty bunches, pome application, manual upkeep, manual dish making and more. The document was revised again on April 2, 2022.

Based on information from interviews and document review that the company has an Occupational Safety and Health (OHS) Plan documented, communicated effectively, and implemented.

### 3.6.2

company has carried out monitoring activities on the effectiveness of the OHS activity plan to address health risks, work accidents and human safety in factories and estates by carrying out monitoring activities every month. The Certification Unit has carried out monitoring activities on the effectiveness of the OHS plan to deal with OHS risks in the workforce at PT. Agro Bukit, (SBE, SLE, SBM, SLE, TPE) such as:

- Monitoring of hydrant inspections conducted every month at Sungai Binti Mill.
- Records of OHS inspections at the estate and mill workplaces every month
- Monthly APAR inspection for Mill
- Implementation of periodic health checks for all factory and estate workers.
- Monitoring of monthly APAR inspections in SLE, SBE, TPE and SWE
- Implementation of special health checks for workers with high risk, such as the risk of exposure to chemicals and noise, which was last carried out on January 21, 2022 at the Estate and Factory.

The certification unit has also carried out activities to minimize the risk of fire, the company has made efforts, including preparing firefighting facilities and infrastructure, and forming an emergency response team in each Division. To maintain the skills of the emergency response team in dealing with fires, there is a fire emergency response simulation program. These activities are carried out regularly every year.

Health checks have been carried out by the company in the period of 2022, some examples of inspections carried out by PT Agro Bukit include:

- **Sungai Lenggana Estate:**
  - The company shows the results of health checks for harvesters on August 2 – 31, 2022, which was attended by 176 harvesters using blood pressure checks and physical examination methods and shows the results of the workers' condition within normal limits and recommendations can work as usual which is checked by a doctor at the clinic company.
  - The company showed the results of the medical examination to the sprayer staff on June 22, 2022, which was attended by 27 sprayers with the method of examination carried out by cholinesterase, blood pressure, physical examination, pregnancy test, dermatomycosis and showed the results of the worker's condition within normal limits and recommendations for work as usual which was examined by the doctor at the company clinic.
  - The company showed the results of the medical examination to the Manuring staff on April 19, 2022, which was attended by 26 manuring workers with the method of examination carried out by cholinesterase, blood pressure, physical examination, pregnancy test, dermatomycosis and showed the results of the worker's condition within normal limits and recommendations can work as usually examined by a doctor at the company's clinic.
- **Sawah Estate:**
  - The company shows the results of health checks to harvesters on September 9-30, 2022 which was attended by 202

harvesters using blood pressure and physical examination methods and shows the results of the workers' condition within normal limits and recommendations can work as usual which are checked by doctors at the clinic company.

- The company showed the results of the medical examination to the sprayer staff on July 5, 2022, which was attended by 31 sprayer workers using the method of examination carried out by cholinesterase, blood pressure, physical examination, pregnancy test, dermatomycosis and showed the results of the worker's condition within normal limits and recommendations for work as usual which was examined by the doctor at the company clinic.
- The company showed the results of the medical examination to the Manuring staff on January 26 – 27, 2022 which was attended by 49 manuring staff with the method of examination carried out by cholinesterase, blood pressure, physical examination, pregnancy test, dermatomycosis and showed the results of the condition of the workers within normal limits and recommendations can be made. work as usual which is checked by a doctor at the company clinic.

Based on information from interviews with management units including with workers in plantations and factories during visits to SWE, TPE, SBE, SLE, it is known that in general employees have understood, accepted policies and socialization related to OHS such as emergency response, and use of PPE. The results of field observations indicate that the company has monitored the effectiveness of the plan in dealing with OHS risks in humans, and has provided PPE to employees in accordance with the results of the risk identification that has been carried out. For example: machine operators use earplugs, process workers use safety shoes, harvest workers use helmets and safety shoes.

**Status: Comply**

### 3.7

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

#### 3.7.1 and 3.7.2

Based on interviews with management representatives, it was stated that the training was prepared based on the identification of training needs, then a training program was developed by the EHS Department.

The company demonstrated a training program for each unit in 2021 covering all aspects of the RSPO P&C. 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. 2022 training programs such as:

- EHS : First Aid training, Manual Handling, HIRADC/JSA, Accident Investigation, etc
- Agronomy : Fertilizing Application, Spraying Technique, etc
- HRD : Socialization company rule and policy
- Mill : KCP Mill SOP Socialization,

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

- Socialization of company rules and policies conducted on October 5, 2022 to employees and stakeholders with a total of 30 participants.
- Minutes of the briefing sprayer which was held on September 7, 2022, which was attended by 5 participants.

The results of interviews with workers such as warehouse officers, harvesters, fertilizer workers, grading officers, boiler officers, it was 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

The Company showed that they had properly documented every training activity and socialization that had been carried out to all workers, contractors, and related stakeholders. The training of SCCS had been conducted on 5 October 2022 for weighbridge operator, laboratory, and admin. Based on the interview with all workers involved in supply chain operations, such as security (for FFB receiving verification), weighbridge operator (for dividing amount of certified and uncertified sourced), and the PIC related to supply chain, they have been understood the supply chain mechanism, and the book keeping record has conducted and monitored quite

well.

Status: Comply

### 3.8

#### Supply Chain Requirements for Mills

##### 3.8.1, 3.8.2

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

##### 3.8.3.

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

	Last Year Projected Certified Volume (MT)	Actual production in last 12 months (MT)	Estimation for the next 12 months
FFB Processed	276,000	233,787.12	234,600
CPO Production	59,600	58,936.33	51,612
Palm Kernel (PK) Production	14,100	11,132.51	11,730

##### 3.8.4

The Mill have been registered in RSPO IT platform for license period (4 July 2022 – 13 December 2022), with license id CB133959, RSPO member id: RSPO\_PO100003333, member name: Sungai Binti Palm Oil Mill – PT Agro Bukit.

Whole transaction of CSPO/CSPK has been declared in RSPO IT Platform, here's the detail:

- CSPK volume sold as physical as amount as 2,088 ton.
- CSPO volume sold as physical as amount as 13,698.68 ton

##### 3.8.5

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

The company's procedures have been revised in accordance with the latest RSPO SCCS system reference (Revised 01 February 2020).

Based on the interview with all workers involved in supply chain operations, such as security (for FFB receiving verification), weighbridge operator (for dividing amount of certified and uncertified sourced), and the PIC related to supply chain, they have been understood the supply chain mechanism accordance with company latest procedure.

##### 3.8.6

The company has conducted an internal audit of the RSPO and supply chain on 12 September 2022. Based on the results of the internal audit, it is known that there are no non-conformities in the supply chain aspect.

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

##### 3.8.7

Sungai Binti POM received FFB from certified sources, here's the detail:

Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Oct 2021	16,771.43	9,857.93	26,629.36
Nov 2021	16,739.75	12,820.54	29,560.29
Dec 2021	16,698.13	10,798.45	27,496.58
Jan 2022	18,712.89	9,418.41	28,131.31

Feb 2022	14,947.87	8,794.29	23,742.16
Mar 2022	19,515.37	10,338.11	29,853.49
Apr 2022	21,233.43	13,214.26	34,447.69
May 2022	21,039.02	18,191.40	39,230.43
Jun 2022	23,252.47	18,897.13	42,149.60
Jul 2022	21,707.64	23,660.83	45,368.47
Aug 2022	23,327.25	29,116.97	52,444.22
Sep 2022	19,841.86	24,281.73	44,123.59
Total	233,787.12	189,390.06	423,177.18

The auditor has verified FFB received records over the last 12 months, the total FFB certified received was 233,787 MT.

Regarding the increase in volume, the company has submitted it to the CB, for example in March 2022.

Mechanisms for handling unsuitable FFB and / or documents have included in the supply chain certification standard Identity preserved procedure with Document Ensuring Traceability of RSPO Certified Product (CPO, PK, PKO & PKE), 6<sup>th</sup> Revision on October 2020.

### 3.8.8

The company shows documentation of certified products, such as sales contracts, shipping announcements, delivery orders, etc. These documents explain the name and contact person of the buyer and seller, date of delivery, product description, quality, quantity, member ID, and others. Here's for the examples: CSPO Delivery record on 21 – 22 May, 2022, Delivery Order No.: PTAI/Bulking/V/2022/06 net weight 500 MT; MB Product Type; Vehicle No. BM 8863 RU; Driver Name Gunawan; Contract No. SB01105-10987; Ticket No. F/ACIK-BLK-003; No MUTU-RSPO/082 Certificate; Product Specification FFA 4.5%. All shipping record also has unique number. In accordance with the indicator's request, proof of delivery is available in the form of a document and has been aligned with the recording of the shipping announcement on the Palmtrace platform.

### 3.8.9, 3.8.10, 3.8.11

The Company has cooperation with third parties related to the handling of the transportation of certified products, namely PT Jaya Harapan Nusa Sejahtera (No.: PKS/SBM/CPO-PKO-TRANSPORT/II/2022/003) which is valid from March 1, 2022 to February 28, 2023. From the results of the review of the agreement documents, it is known that information related to compliance with government regulations, transporters are obliged to provide and use PPE when working. There also statement letter from transporter namely CV Flora Jaya Transport Ito which stated that transporter willing to comply to all RSPO requirement and willing to be audited by CB with prior notification through PT Agro Bukit. In total there are 9 contractors who work closely with the company in handling certified products. Until the surveillance audit activities were carried out, there were no new contractors from the previous assessment.

### 3.8.12

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

#### Crude Palm Oil

Period	CPO production (MT)		Total	CPO Dispatch (MT)			Total
	Cert	Non-Cert		RSPO	Another scheme	Non-Cert	
Opening Stock	9,954.00	-	-	-	-	-	-
Oct-21	3,554.25	2,556.60	6,110.85	2,703.03	-	5,885.60	8,588.63
Nov-21	3,560.62	2,661.61	6,222.23	3,353.94	-	4,002.70	7,356.64
Dec-21	3,743.66	1,762.74	5,506.40	2,000.00	-	6,003.63	8,003.63
Jan-22	4,078.53	2,304.69	6,383.22	4,002.86	-	2,000.00	6,002.86
Feb-22	3,145.71	1,765.53	4,911.24	4,008.53	-	198.40	4,206.93
Mar-22	4,255.25	2,117.13	6,372.38	3,640.82	-	2,801.72	6,442.54
Apr-22	4,554.29	3,873.13	8,427.42	5,948.73	-	1,001.70	6,950.43
May-22	4,240.83	3,864.68	8,105.51	2,500.11	-	3,000.78	5,500.88

Jun-22	4,949.49	3,550.69	8,500.18	10,805.66	-	1,497.26	12,302.92
Jul-22	4,387.67	5,223.38	9,611.05	9,498.35	-	4,493.10	13,991.45
Aug-22	4,612.10	6,043.24	10,655.34	4,697.35	-	6,494.48	11,191.83
Sep-22	3,899.92	3,758.04	7,657.96	2,997.67	-	4,001.29	6,998.96
<b>Total</b>	<b>58,936.33</b>	<b>39,481.45</b>	<b>88,463.78</b>	<b>56,157.05</b>	<b>-</b>	<b>41,380.66</b>	<b>97,537.71</b>

There's CSPO sold as certified product as amount as 56,157.05 MT for 12-month period.

### Palm Kernel

Period	PK production (MT)		Total	PK Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
Opening Stock	-	-	-	-	-	-	-
Oct-21	903.85	649.13	1,552.98	903.85	-	-	904.00
Nov-21	830.78	623.27	1,454.05	830.78	-	-	831.00
Dec-21	856.29	398.96	1,255.25	856.29	-	-	856.00
Jan-22	923.41	522.47	1,445.88	923.41	-	-	923.00
Feb-22	636.97	361.80	998.77	636.97	-	-	637.00
Mar-22	1,001.67	497.23	1,498.90	1,001.67	-	-	1,002.00
Apr-22	957.08	820.88	1,777.96	957.08	-	-	957.00
May-22	932.83	850.48	1,783.31	932.83	-	-	933.00
Jun-22	1,041.08	744.95	1,786.03	1,041.08	-	-	1,041.08
Jul-22	1,039.87	1,242.89	2,282.76	1,039.87	-	501.34	1,541.34
Aug-22	1,048.07	1,372.59	2,420.66	1,048.07	-	297.00	1,345.00
Sep-22	960.63	907.65	1,868.28	960.63	-	-	961.00
<b>Total</b>	<b>11,132.51</b>	<b>8,992.32</b>	<b>20,124.83</b>	<b>11,132.51</b>	<b>-</b>	<b>798.34</b>	<b>11,931.42</b>

There's CSPK sold as certified product as amount as 11,133 MT for 12-month period.

### 3.8.13, 3.8.14

Sungai Binti POM has determined the extraction rate for CPO and PK to be produced. Based on actual production of CPO and PK for last 12-month period. The Extraction rate for production projections will be update annually based on the actual production of CPO and PK.

### 3.8.15

Sungai Binti Palm Oil Mill applies the MB supply chain model, because mill receives fruit from certified and uncertified sources. Sources of certified fruit come from Tanah Putih Estate, Sungai Binti, Sungai Lenggana and Sawangan Estate (Certificate No. MUTU-RSPO/082).

### 3.8.16

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

Member Name: Sungai Binti Palm Oil Mill – PT Agro Bukit  
 Membership No.: 1-0175-14-000-00 (Goodhope Asia Holdings Ltd.)  
 Member ID: RSPO\_PO1000003333  
 License ID: CB133959

Whole transaction of CSPO/CSPK for latest period license (4 January 2021 to 3 July 2022) has been declared in RSPO IT Platform, here's the detail:

- CSPK volume sold as physical as amount as 17,974.08 ton.
- CSPO volume sold as physical as amount as 70,765.68 ton



From shipping announcement verification, known that shipping announcement carried out not more than 3 months after dispatch. For example:

- Record of the transportation of certified products in the form of CSPK on July, 2022, equipped with a weighing card with a payload of 1,000 tons. Records of the delivery of the product were disclosed in the RSPO Palm Trace on 31 July 2022 and confirmed by the purchaser (PT Agro Bukit Kernel Crushing Plant) on 12 Augusts 2022.
- Record of the transportation of certified products in the form of CSPK according to contract no. SB01XI05-10945 on May, 2022, equipped with a weighing card with a payload of 500 tons. Records of the delivery of the product were disclosed in the RSPO Palm Trace on 22 May 2022 and confirmed by the purchaser (PT Wilmar Nabati Indonesia) on 27 June 2022.

### 3.8.17

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

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

**Status: Comply**

## **PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS**

### **4.1**

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

#### **4.1.1**

The Company has a Human Rights Policy document of Goodhope Asia Holdings LTA No GAHL.SP.0222 issued on July 15, 2022 which includes for example the following:

- Respect all rights and freedoms as stated in the Universal Declaration of Human Rights (UDHR) including the rights to privacy, association, social and cultural security, freedom of expression, freedom from interference and equal rights to work, health and education.
- Prioritize the rights of women workers, adopting measures to promote protection and safety at work and to provide equality of opportunity, treatment, pay and representation.
- Recognize that every individual has the right to defend human rights and prohibit intimidation and retaliation against Human Rights Defenders.

The company also showed socialization of the policy, for example on October 5, 2022 to employees and stakeholders with 30 participants. Based on interviews with workers in estates, mill and local contractors, they can explain and learn about the company's existing human rights policies.

#### **4.1.2**

Based on the results of field visits in the estate and mill, it was found that there were no paramilitaries, and security was only carried out by the security unit (Satpam). In addition, based on interviews with village representatives, trade unions and online media, it was stated that the company did not initiate acts of violence or any form of intimidation in its operations.

**Status: Comply**

### **4.2**

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

#### **4.2.1 – 4.2.3**

The company has a complaint handling mechanism, for example, which is shown in the following procedures:

- SOP for Communication, Participation, and Consultation No IMS.P-05 dated 4 May 2015. The SOP describes the person responsible for communication and consultation with external and internal stakeholders, methods of communication, handling of internal and external complaints.
- SOP Grievance Handling No CSR 8 revision 1 dated July 1, 2010. The SOP describes methods for handling complaints from external parties. Incoming complaints will be recorded in the Communication Report.

- SOP Media Response Version 1 dated July 1, 2010. The SOP describes the handling of issues received from the mass media

The procedure describes the method including internal communication, handling complaints, internal complaints and suggestions (formal and informal) which are responded to no later than 14 working days, external communication which is responded to no later than 14 working days, communication to guests and contractors, one-way communication, participation and worker consultation, external party consultation, confidentiality of identity when requested (whistleblower), monitoring and reporting, storage of communication results. Two-way communication such as OHS committee meetings, bipartite cooperation institution forums, OHS Committee meetings and consultations.

The PIC who is responsible for receiving complaints and complaints/communications with the appropriate departments according to their functions, among others:

- EHS Department for consultation on environmental, health and safety issues
- HR Department for consultation on employment issues
- CSR Department for consultation on social issues

The company also documents complaints and their handling which is listed in the complaint logbook document for the 2022 period. In the document it is known that there have been no complaints from external stakeholders, while there have been several complaints from workers in that period, for example, those submitted on August 10, 2022 by personnel with the initials YP who works as a harvester of the Sungai Lenggana Estate with a complaint that he does not know about the calculation of premiums/incentives for pruning activities. Furthermore, the company conducted a socialization of premiums/incentives for pruning activities on August 12, 2022 during the morning briefing.

The company also showed socialization related to communication, consultation and complaints, for example on October 5, 2022 to employees and stakeholders with a total of 30 participants. Based on interviews with trade unions and contractors, it was stated that the personnel already know the mechanism for submitting complaints and the person in charge of the company, if there is anything to be conveyed.

Based on interviews with management representatives, it was also known that to affected parties, including those who cannot read and write, the company will provide verbal responses and install complaint mechanisms in strategic places such as estate offices.

#### 4.2.4

There is no change in procedure.

As a guide in resolving land disputes, the company has several procedures including:

- SOP for handling complaints including land claims using the SOP Grievance Handling dated July 1, 2010 approved by the Director of Sustainability.
- SOP EHS.NPP-01 Revised March 30, 2016 concerning Procedures for the Preparation of New Land Development.
- Land Acquisition Procedure, in Part 3.2 about Overlapping Land September 22, 2016 that described Activity & responsibility chart that covers Overlapping Land Between Villager and or other company, to ensure all overlapping land issued are resolved or minimized prior to making payment on account of land compensation, that is :
  - The Village Head and the Village Consultative Body (Village Statistics Agency) should be consulted if there are overlapping claims submitted in the same village or between villages.
  - Once the village head/team resolves the issue, the village head issues and signs Judiciary Report and it should be approved by the involved villagers, village head and subdistrict head.
  - The Public Relations Manager receives the News Event and ensures that its endorsed by Village Head and subdistrict head.
  - If the claim is still not resolved the Partner Relationship Management shall consult the village team following the above process until the solution is found.
  - After the subsequent deliberation also if the overlapping is not resolved General Manager should be informed

The results of interviews with workers and third parties, it is known that workers and third parties have understood the complaint mechanism. Employee complaints can also be submitted to representatives of the trade unions.

<b>Status: Comply</b>
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**4.3**
**The unit of certification contributes to local sustainable development as agreed by local communities.**
**4.3.1**

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

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

- Road repair in Rongkang Village in August 2021.
- Distribution of vitamins for the State Elementary School 1 Natai Baru Village in November 2021.
- Facilitating field work practices for Muhammadiyah University students from April 2021 to March 2022.

	<b>Status: Comply</b>
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**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**

Based on the document review and explanations from management representatives, it is known that the company's management area is 12,436 Ha with the certification area being 11,939.69 Ha. From this area, 2,086.40 hectares have *HGU*, while the remaining 9,850.29 hectares are still in the process.

In the RSPO Update Statement on *HGU* dated April 01, 2020, it was stated that the announcement made earlier in July 2018 regarding the implementation of Cultivation Rights in the certification of the RSPO Principles and Criteria, among others, stated that in the surveillance audit stage following the previous notification "For RSPO grower members that are currently RSPO certified but are yet to obtain the *HGU* their certification will continue".

The company has also demonstrated the *HGU* process, such as:

- Report on the Implementation Results of Area Boundary Management Approval in Principle of Exchanging Forest Areas to Build an Oil Palm Plantation of PT Agro Bukit In the Forest Area Approved for Release in the Mentaya Hilir Utara District, Kotawaringin Timur District, Kalimantan Tengah Province on January 18, 2021 by the Director General of Planology and the Director of Confirmation and Determination of Forest Areas of the Ministry of Environment and Forestry of the Republic of Indonesia (Length : 77,242.65 M Area : 8,752.54 Ha)
- Letter Number S.387/MENLHK/SETJEN/PLA.2/10/2021 dated October 29, 2021 from the Minister of the Environment of the Republic of Indonesia concerning the Second Extension of the Principle Approval of Swapping Forest Areas for Oil Palm Plantations a.n. PT Agro Bukit in the form of Permanent Production Forest Areas an area of  $\pm$  8,750 Ha located in Kotawaringin Timur District, Kalimantan Tengah Province with Prospective Replacement Land in the form of Convertible Production Forest covering an area of  $\pm$  8,766 Ha located in Katingan Regency, Kalimantan Tengah Province

The company shows the latest record of developments related to the issuance of land rights (previous OFI), where currently the Decree of the Minister of Environment and Forestry has been issued on July 15, 2022 (Number SK.724/MENLHK/SETJEN/PLA.2/7/2022) concerning the determination The area boundary for the release of permanent production forest area for the development of oil palm plantations on behalf of PT Agro Bukit, in the Kotawaringin Timur Regency, Kalimantan Tengah Province, covers an area of 8,752.54 ha. The document informs the lethality and boundaries of the release area for permanent production forest areas after measuring and structuring the area boundaries according to the Principle of Swapping Forest Areas for the development of oil palm plantations on behalf of PT Agro Bukit on April 6, 2021, which has been approved by the Director General of Forestry Planning and Environmental Management. on the stairs; 19 January 2021 and the attached map. This letter also stipulates the area with the status of being another use area as the basis for the implementation of oil palm plantation development activities by PT Agro Bukit.

The company's target in completing the acquisition of land rights is 1.5 years for areas that have not been in HGU.

The HGU utilization report for the area where the HGU has been granted (2,086.40 ha) has also been reported to the relevant agency (Land Agency of Kotawaringin Timur Regency) on 14 February 2022

### 4.4.2, 4.4.4, 4.4.6

The company has freed its management area from other rights and interests as shown in the stages of acquiring land rights to Sungai Binti POM. All records are kept by the company in the form of hard and soft copies with appropriate language. Land acquisition was carried out in the period 2005 – 2013 with the total area of compensation 30,891.40 Ha and 2,761 land owners. Based on the interviews with representatives of Penyang and Rongkang Village, which are one of the previous land-owning villages, it is known that the land compensation process has been based on the agreement of both parties without any intimidation from any party. Other evidences of the land acquisition process based on FPIC include:

- Payment receipts and payment documentation. Signed by the land owner.
- Statement Letter of Resigning Rights and Interests on Land and Planting Grows on Forest Area Land and Receipt of Payment of Compensation. Signed by both parties and recognized by the sub-district head and village head
- Statement of Land Rights Release. Signed by the land owner.
- Certificate of waiver of rights. Signed by the Company, Land owner, Lurah and Subdistrict Head
- Statement letter with attached sketch of land drawing. Signed by the land owner, the village head and the head of the neighborhood
- Documentation of proof of payment.

Based on the results of interviews with the surrounding community, it is known that the company has carried out land acquisition for the area it manages.

### 4.4.3

The company can show a map with a scale of 1:50,000 which describes the land rights owned by the company as the basis for the company's operational area. The company has also shown a cadastral map recording document in 2008 which shows the area of the area that is currently in the process of issuing the land use title. The map informs the boundaries of the company's land rights.

### 4.4.5

The company already has a Land Acquisition Procedure which was issued on 22 September 2016. The procedures include regulations regarding the land acquisition process including FPIC with the parties. Based on the results of interviews with parties who have received compensation for land compensation from PT Agro Bukit (Penyang Village), information is obtained that he has received compensation for the land he has claimed and all the files for the settlement process are also kept by the person concerned. All land claim settlement processes, from identification, negotiation to compensation, are carried out through the agreement of the parties.

**Status: Comply**

### 4.5

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

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

There is no change from the previous assessment. The company has not carried out any new planting's activities.

**Status: Comply**

### 4.6

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

### 4.6.1,

In order to identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, the company

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

Based on interviews with Representatives Rongkang Village, information was obtained that there is no company plantation land originating from customary land rights.

### 4.6.2

Based on the management's explanation and a review of the land compensation procedure, the company always refers to the local government regulations and will update it in accordance with the existing office regulations in Indonesia. Same as indicators 4.6.1 statement, the mechanism to identify and compensation procedure were carried out by forming team consisting of community leaders, company and government representative and price were determined based on negotiations.

### 4.6.3

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

### 4.6.4

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

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

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

**Status: Comply**

## 4.7

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

### 4.7.1

The procedure for compensation for the purchase of land is also contained in the land development preparation procedure no. SOP.EHS.NPP-01 2010 revised on 30 March 2016, land acquisition procedures on 22 September 2016 and SOP Land Clearing and Development No. LCD 2.1, on August 5, 2010. The procedure also explains the identification, calculation, and compensation for the loss of legal rights and traditional rights for each landowner who is entitled to be compensated.

There's no revision or change related to mechanism and procedure of land acquisitions from latest assessment.

### 4.7.2

The procedure also explains that the payment of compensation is fair without harming one party. Based on that procedure verification, that during the compensation process for growing plantings for community arable areas, the company carried out a mechanism of negotiation without coercion, joint measurement, deliberation on price fixing involving the relevant agencies and payments to the direct owner or a designated group representative. The procedure has implemented FPIC principles, where the compensation process will not be carried out without the agreement of both parties.

### 4.7.3

This can be proven from the results of an interview with the previous landowner from Rongkang Village, he explained that there was no coercion in the process of selling the land, the compensation process has also implemented an FPIC system, there is no coercion and it is agreed by both parties without harming anyone.

	<b>Status: Comply</b>	
<b>4.8</b> <b>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.</b>		
<b>4.8.1; 4.8.4; 4.8.3; 4.8.4</b> <p>Based on the results of the area statement document verification, interviews with representatives of Rongkang and Penyang Village it was found that there were no land disputes in the operational area of PT Agro Bukit.</p> <p>Currently in the company's HGU there is an area occupied by the community with an area of 512 ha. The company admits that the land compensation agreement in the area has not yet been signed. The auditor made observations in the occupation area, from the results of observations it was found that the boundary stakes were installed according to the agreement and there were no indications of encroachment or operational disturbances between the parties.</p>		
	<b>Status: Comply</b>	
<b>PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION</b>		
<b>5.1</b> <b>The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</b>		
<b>5.1.1</b> <p>The company has sale and purchase agreements with several outside FFB suppliers, for example:</p> <ul style="list-style-type: none"> <li>• FFB Sale and Purchase Agreement CV Sinar Mentari (No. PTAB/C/372.1)</li> <li>• FFB Sale and Purchase Agreement CV Naura Cemerlang (No. PTAB/C/409.1)</li> </ul> <p>In the agreement there is an explanation related to the price and payment of FFB, where the purchase price of FFB is determined and announced regularly to the seller. The seller and certificate holder jointly agree on the FFB price to be determined based on the fluctuating market prices of Crude Palm Oil and Palm Kernel. The agreed FFB price will be conveyed by the Buyer to the Seller via electronic mail (email) and/or other communication tools agreed by both parties prior to delivery by the Seller. Payment for the agreed FFB price is carried out on a weekly basis by means of a transfer system to a Bank account to the FFB supplier. Based on interviews with representatives of CV Naura Cemerlang, the seller had no difficulty in obtaining FFB price information and there were no negative issues related to payment. The company has also shown proof of FFB payment to the seller for the period 26 to 28 September 2022, which is accompanied by proof of transfer and details of the FFB quantity along with the selling price which has been signed by both parties. For the scheme smallholders, the determination of the price of FFB purchased refers to the provisions contained in the Regulation of the Minister of Agriculture regarding the Guidelines for Determining the Purchase Price of Fresh Fruit Bunches for Palm Oil Production by Smallholders.</p>		
<b>5.1.2</b> <p>Based on the results of interviews with FFB suppliers (CV Naura Cemerlang), it is known that the company as the FFB buyer always informs the FFB price to the supplier on a regular basis, either via telephone or multimedia message. This also includes FFB suppliers from plasma plantations, where price information is communicated via a notice board at the mill according to the price set by the government.</p>		
<b>5.1.3</b> <p>In the agreement between company and FFB supplier, there is an explanation related to the price and payment of FFB, where the purchase price of FFB is determined and announced regularly to the seller. The seller and certificate holder jointly agree on the FFB price to be determined based on the fluctuating market prices of Crude Palm Oil and Palm Kernel.</p>		
<b>5.1.4</b> <p>The company can show the cooperation / MOU for Plasma Development between the company and the Rongkang Mandiri Producers Cooperative, the Bima Penyang Mandiri Cooperative, the Bangkuang Makmur Lestari Cooperative, the Permata Village Unit Cooperative and the Sinar Mentari Pagi Cooperative</p>		



In the drafting of the MOU, the company conducted an inventory of the location, area and status of the prospective plasma plantations and compiled a participatory plasma development plan and involved women in meetings and in plasma outreach activities in several villages in October and November 2018.

#### 5.1.5

The company has cooperation with local contractors, such as transporting FFB and upkeep activities. All contracts have been agreed between management and the contractor concerned. Example of contracts in units are shown below.

- FFB Sale and Purchase Agreement CV Sinar Mentari (No. PTAB/C/372.1) dated 1 May 2019.
- FFB Sale and Purchase Agreement CV Naura Cemerlang (No. PTAB/C/409.1) dated 17 May 2021.

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

#### 5.1.6

For the payment process, the certificate holder pays via money transfer to the FFB seller's account. Based on interviews with representatives of CV Dinaya Mulya, the seller had no difficulty in obtaining FFB price information and there were no negative issues related to payment. The company has also shown proof of FFB payment to the seller for the period July 2022, which is accompanied by proof of transfer and details of the FFB quantity along with the selling price which has been signed by both parties. There are no issues related to late payments, the supplier's why the price has been known transparently and there is no indication of harm to the supplier.

#### 5.1.7

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

- Calibration record Number 510.63/326/DPP/SKHP/MET/VIII/2022 dated 1 August 2022 with a validity period until 3 Augusts 2023 2022 for weighbridges type E1205 Tronix with serial number 162556132 from the Department of Commerce and Industry of Kotawaringin Timur Regency.
- Calibration record Number 510.63/327/DPP/SKHP/MET/VIII/2022 dated 1 August 2022 with a validity period until 3 Augusts 2023 2022 for weighbridges type E1205 Tronix with serial number 130150112 from the Department of Commerce and Industry of Kotawaringin Timur Regency.

For both calibration record, the third party stated the test results, *"Legally on 2022 according to the law of Republic Indonesia No. 2 of 1981 concerning Legal Metrology"*. With the calibration evidence, the company has shown evidence that the weighing equipment used to weigh FFB from outsiders is minus indications of fraud.

#### 5.1.8.

Currently the company does have contracts with independent smallholders or plasma smallholders. Based on the results of interviews with village and community representatives, the company often discusses with independent smallholders regarding support for the legality of land owned by farmers.

#### 5.1.9.

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

**Status: Comply**

### 5.2

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

#### 5.2.1

The certification unit has conducted consultations with FFB supplying farmers as evidenced by evidence of socialization related to RSPO certification to independent smallholders and plasma farmers through regular meetings between the company and FFB

suppliers. The company shows the Minutes of the annual meeting with plasma farmers on August 26, 2022 at the Sungai Binti Estate office which was attended by the company, the village government, and all representatives of the plasma cooperative management. From the results of the meeting, it was stated that the plasma farmers would participate in the company's initiation to include their lands in RSPO certification, but there are obstacles in the legality of the land which is currently still in Special Production Forest status so that they cannot have a valid land title ownership certificate.

The results of interviews with company management stated that until now, the process carried out is still hampered by land legality and the formation of groups for independent smallholders. Meanwhile, for plasma farmers because it will be included in the timebone plan in 2023, the company continues to assist plasma farmers. Constraints faced by plasma management cooperatives are also similar to independent smallholders, namely related to the legality of the land where their location does not yet have the Cultivation Rights required by the RSPO. Regarding OFI in the previous audit, the company can show evidence that there has been an attempt by the company to obtain the legality of the plasma farmers' land with evidence of the last communication made to the Ministry of Forestry on September 5, 2022 regarding the status of the land. Based on this, the company has followed up OFI in the previous audit, but the obstacles faced cannot be resolved in a short time because the land legality process requires the involvement of many parties.

### 5.2.2

The company has made improvements to the welfare of the communities around the plantations by developing and fully managing plasma plantations and routinely conducting socialization related to RSPO certification at every annual meeting. In addition, companies can also show socialization documents on best practices in oil palm cultivation, work safety, environment, fire, benefits of RSPO, and recommendations for registering RSPO to independent smallholders, which was conducted on August 26, 2022, which was attended by 21 participants. However, based on the explanation in indicator 5.2.1 which states that there are no smallholders who can participate in RSPO certification due to several obstacles, so far, the company has only implemented programs to improve the standard of living for farmers to the extent of providing socialization.

### 5.2.3

Based on the explanation in indicator 5.2.1 which states that there are no farmers who can participate in RSPO certification due to several obstacles, so far, the company has only implemented programs to improve livelihoods for farmers, limited to providing socialization. Regarding support for farmers to encourage the legality of FFB production, it is only carried out for the scope of plasma farmers, while for independent smallholders, support is only done indirectly in the form of data collection on the legality status of land owned by all FFB suppliers in compliance with indicator 2.3.2 where companies are required to obtain FFB from legal sources.

### 5.2.4

When the audit was conducted, the collaboration between the certification unit and plasma was carried out under a full managed system where the management of plantation management was fully carried out by the company, so that all workers working on plasma plantations were company workers and had been trained by the company in handling pesticides, treatments, fertilization and others. Evidence of training for workers related to best management practices can be shown through the minutes of activities carried out on August 8, 2022 for 31 participants at Sungai Binti Estate. Based on this, the company does not conduct training for smallholders who own plasma.

### 5.2.5

The unit of certification can show evidence that it has publicly reported the support program for smallholders, especially plasma farmers regarding its development which is carried out regularly. The evidence shown is based on the receipt of the LPUP submission document for the 2nd Quarter of 2022 to the Kotawaringin Timur Agriculture and Plantation Service, dated 11 August 2022 and the CSR Report for the 2nd Semester of 2022 which is publicly accessible.

	<b>Status: Comply</b>	
<b>PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS</b>		
<b>6.1</b>		
<b>Any form of discrimination is prohibited.</b>		
<b>6.1.1 and 6.1.2</b>		

The company has a document of Ethical Behavior and Employment Standards Policy Goodhope Asia Holdings LTA No GAHL.SP.0322 issued on July 28, 2022 which includes for example the following:

- Maintain a work environment that is free from discrimination and promotes fair and impartial care for all individuals regardless of gender, race, age, disability, religion, nationality or sexual orientation.
- Prohibit all forms of forced, trafficked or child labour.

The company also showed the socialization of the policy, for example on October 5, 2022 to employees and stakeholders with a total of 30 participants. Based on interviews with workers in plantations, factories and local contractors, it can be concluded that stakeholders understand the policies that are owned by the company and are conveyed in Indonesian.

The results of the study of the labor list document revealed that the workers came from various ethnic groups, such as Batak, Javanese, NTB, Flores, Banjar/Sampit etc.

The results of interviews with workers such as harvesting, spraying, mechanics, warehouse officers, etc. as well as trade unions, revealed that there were no issues of discrimination. The company provides equal opportunities to work and do business and there are no costs incurred by prospective employees in the employee recruitment process.

### 6.1.3

The company has a Human Resources System as follows:

- Work Instruction Recruitment No. 01/HR-WI/09, 29 January 2012 which explains that the selection process includes interviews, administration, identity cards, curriculum vitae and MCU and if they meet the requirements, HR will issue a contract/agreement letter.
- Company regulations for the period 2021-2023 which explain the human resource system, for example:
  - Article 5 regulates the terms of acceptance of workers.
  - Article 12 regulates the assessment of workers.
  - Article 13 regulates the terms of promotion.
  - Article 15 regulates the retirement age.
  - Article 70 regulates the termination of employment.

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

#### **recruitment**

The company processes employee recruitment from application until prospective employees undergo a probationary period, for example the company shows an application letter on behalf of the initials DE which was sent on May 15, 2022 to apply for the cleaning gang position, then the company conducts a test interview and interview on June 4, 2022 with the results it is recommended to pass and will undergo the next stage, namely a health examination. After being declared to have passed the medical examination, personnel with the initials DE signed a work agreement on July 12, 2022 with a probationary period of 3 months. In the recruitment process, the company finances the stages carried out by prospective employees and prospective employees are free of charge.

#### **Promotion**

A letter regarding the appointment of permanent employees dated April 27, 2022, which was signed by the Director, namely personnel with the initials W who had carried out a probationary period from January 21, 2022 – April 20, 2022, declared their status as permanent employees in the position of Senior Assistant starting from April 21, 2022.

### 6.1.4

The company does not conduct pregnancy testing for female workers except for workers dealing with chemicals. Based on the results of monitoring the health checks of female spray workers conducted at the clinic, interviews with female workers were also conveyed that pregnancy testing was only carried out for female workers whose work was related to chemicals to avoid exposure to chemicals.

### 6.1.5

The company already has a gender committee as stated in the Decree No. 059/GMO/PT.AB/SK-HR/2022 dated September 10, 2022 regarding the Appointment of the Women's Committee Manager of PT Agro Bukit for the period 2022 - 2024. The composition of the gender committee consists of the Chairperson, GMO Representatives, Representatives of each Estate and Factory, representatives of the central workshop and representatives of the clinic. The gender committee also has a work program, for example:

- Routine activities such as group sports and immunizations.
- Socialization such as sexual harassment and waste sorting.
- Celebrations such as OHS Day and Kartini Day.
- Gender committee annual programming meeting

The company also demonstrated the realization of the program, for example sexual socialization and sorting the types of waste held on October 5, 2022, which was attended by 30 people.

The results of interviews with the gender committee management and interviews with female workers, it is known that the workers already know the function of the gender committee and there are no issues of harassment and violence at PT Agro Bukit.

### 6.1.6

The company shows the decision letter No. 003/AB-HR/SK.550/II/2022 issued on January 21, 2022 regarding the structure of the wage scale that regulates the wage scale for the positions of daily worker, Daily unit payment and Monthly unit payment with three categories, namely the lowest wage, middle wage and highest wages, for example:

- Daily worker: the lowest wage is IDR 3,014,733; the middle wage is IDR 3,257,366 and the highest wage is IDR 3,500,000
- Daily unit payment: the lowest wage is IDR 3,014,733; the middle wage is IDR 3,257,366 and the highest wage is IDR 4,000,000

Based on the findings of the previous assessment, the company can show improvement and evidence that employees are paid equally for the same scope of work, for example shown in internal memo No. 005/AB-IM/GMO/III/2020 concerning Revision Loading Rate Incentive & Penalty which states the same basis for FFB loading work, which previously for Daily unit payment had a base of 4.8 tons and a daily worker basis of 5.2 tons so that it has revised on the basis to be the same for Daily unit payment and daily workers of 4.8 tons. In addition, the company shows the same wages, for example that shown for FFB loaders with Daily unit payment status, namely a basic salary of 1,501,357 and a rice allowance of Rp. principal amounting to Rp 1,567,657 without rice allowance.

Based on this, it can be concluded that the minor findings in the previous assessment have been met.

<b>Status: Comply</b>
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### 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 was ratified by the Manpower and Transmigration Office on June 10, 2021 which is valid for 2 years from the date of ratification. The Company Regulations are available in Indonesian and have explained about Employment Relations, Work Implementation (Working Days, Working Hours, Overtime, Holidays, etc.), Annual Leave and Exemption from Obligation to Work, Education, Performance Management Training and Development, Job Transfers /Unit, Promotion (Promotion) and Employee Demotion (Demotion), Wages, Social Security, Health, Workers' Facilities and Welfare, Awards, OHS and Work Equipment, Company Code of Conduct and Violation Sanctions, Termination of Employment (PHK) and complaints grieved.

The wages applied by PT Agro Bukit based on the Decree of the Governor of Kalimantan Tengah No. 188.44/445/2021 which stipulates the minimum wage for Kotawaringin Timur district at Rp. 3,014,732.66. The company also shows Internal Memo No. 005/AHL-SPU/HARI/XII/2021 dated December 15, 2021 regarding Adjustment of daily Fixed Period Working Agreement wages and SKUs in 2022 which explains that the daily wage of SKU employees is IDR 115,489 / day plus rice allowance according to marital status and for daily Fixed Period Working Agreement employees is IDR 120.589 / Day.

The types of work arrangements in the company are permanent workers (Daily unit payment and Monthly unit payment) and daily workers.

The company shows the implementation of wages contained in employee salary slips, for example:

- Initials OAA, the work of mill process employees with monthly unit payment class, who is given a salary for the September 2022 period of IDR 7,716,000, with details of basic salary of ID 2,991,583; overtime of IDR 4,728.843; rice allowance of IDR 267,750; other allowances of IDR 484.909 and a discount of IDR 756.169.
- Initials OAA, the work of mill process employees with the Daily unit payment class, who are given wages for the September 2022 period of IDR 5,985,000, with details of weekday salaries of ID 4,939,250; Sunday salary of IDR 586,284; rice allowance of IDR 371,280; other allowances IDR 216,451 and a discount of IDR 128,209.

Based on the results of interviews with workers in estates and mills, it is known that workers can explain details related to wages contained in salary slips, for example wages received every month and wages paid when overtime or working on Sundays.

### 6.2.2

The company shows a list of employees for the September 2022 period consisting of permanent employees (Daily unit payment and Monthly unit payment) and employees on probation. The company also shows a probationary agreement, for example, a work agreement on behalf of the initials PPM with No GMO/HRD/VIII/2022/00MGM with an agreement that personnel undergo a trial period in the harvest section from September 10, 2022 to December 9, 2022, which is signed by the company. and the workers on September 9, 2022. The agreement also explains several terms of work, rights and obligations of workers, wages, leave, social security and others.

The company has a Company Regulation for the period 2021 – 2023 which was ratified by the Manpower and Transmigration Office on June 10, 2021 which is valid for 2 years from the date of ratification. The Company Regulations are available in Indonesian and have explained about Employment Relations, Work Implementation (Working Days, Working Hours, Overtime, Holidays, etc.), Annual Leave and Exemption from Obligation to Work, Education, Performance Management Training and Development, Job Transfers /Unit, Promotion (Promotion) and Employee Demotion (Demotion), Wages, Social Security, Health, Workers' Facilities and Welfare, Awards, OHS and Work Equipment, Company Code of Conduct and Violation Sanctions, Termination of Employment and complaints grieved.

The company also shows a probationary agreement, for example, a work agreement on behalf of the initials PPM with No GMO/HRD/VIII/2022/00MGM with an agreement that personnel undergo a trial period in the harvest section from September 10, 2022 to December 9, 2022, which is signed by the company. and the workers on September 9, 2022. The agreement also explains several terms of work, rights and obligations of workers, wages, leave, social security and others.

### 6.2.3

The company also demonstrates the implementation of legal compliance for regular working hours and overtime for example, overtime payments on behalf of the initials OAA for production work at the mill with calculation details:

- Basic salary of IDR 2,991,583 and rice allowance of IDR 267,750 for a total of IDR 3,259,333.
- The overtime pay is IDR 3,259,333 divided by 173 which is IDR 18,840.
- Overtime for personnel on September 9, 2022 (weekdays) in the amount of 1 hour so that the overtime pay received is 1.5 times IDR 18,840 which is IDR 28,260.11.
- Overtime for personnel on 10 September 2022 (short day) is 4 hours so that the overtime pay received is 1.5 times IDR 18,840 plus 3 times 2 times IDR 18,840 which is IDR 141,300.56.

Based on these calculations, the company has paid overtime wages in accordance with company regulations and applicable regulations.

### 6.2.4

The company shows a list of facilities and infrastructure consisting of:

- Housing facilities (permanent)
- Places of worship (mosques and churches)
- Clinic
- Sports facilities (football field, badminton, table tennis, volleyball)
- Educational facilities in the form of kindergarten
- Daycare
- School bus



- Clean water
- Electricity from generator
- Landfill.

Based on field visits to residential areas, it is known that the company has provided facilities and infrastructure to workers such as electricity, clean water sourced from drilled wells, day care, clinics, kindergartens, sports facilities and others. The facilities and infrastructure provided are in proper condition and functioning properly.

### 6.2.5

Based on interviews with unions and workers, it is known that there are traders who routinely go around selling food/basic materials. In addition, there are also workers/workers' families who sell basic needs in housing areas. From the results of the interview, it was also stated that the distance from the housing area to the nearest market can be reached in approximately 30 minutes by motorbike.

### 6.2.6

The company applies wages based on the Decree of the Governor of Kalimantan Tengah No. 188.44/445/2021 which stipulates the minimum wage for Kotawaringin Timur district at Rp. 3,014,732.66. The company also shows Internal Memo No. 005/AHL-SPU/HARI/XII/2021 dated December 15, 2021 regarding Adjustment of daily Fixed Period Working Agreement wages and unit payment in 2022 which explains that the daily wage of unit payment employees is IDR 115,489 / day plus rice allowance according to marital status and for daily Fixed Period Working Agreement employees is IDR 120.589 / Day.

Regarding the DLW (Decent Living Wage), the company has assessed the wages paid in accordance with the minimum wage in Kotawaringin Timur Regency and has also assessed the in-kind benefits provided, which include housing costs, water, electricity for homes, health facilities, school for the children of workers, which is Rp. 1,911,599 (excluding wages), the total prevailing wage per month is found to be IDR 4,926.332.

### 6.2.7

Based on the verification of the labor register document, it is known that all plantation and factory employees consist of permanent workers (Daily unit payment and Monthly unit payment) and probationary workers. The company has shown examples of agreements with employees on probation, such as:

- Employment Agreement (Probation Period) No. GMO/HRD/VIII/2022/00MGM dated September 9, 2022 explained that personnel with the initials PPM conducted a trial period from September 10 – December 9, 2022 in harvesting activities.
- Employment Agreement (Probation Period) No. GMO/HRD/VIII/2022/00MGM dated September 9, 2022, explained that personnel with the initials BM conducted a probationary period from September 10 – December 9, 2022 in harvesting activities.

The company also uses contractors for work that is seasonal (not done continuously) and is also intended for social purposes (helping local residents to be able to work). Contractors used by the company for transportation activities such as transporting CPO/PK, transporting FFB, heavy equipment and others.

In relation to OFI in the previous assessment, the company no longer recruits with the status of a Fixed Period Working Agreement, but the company carries out the recruitment process with the status of an indefinite time employment agreement with a trial period of 3 months.

**Status: Comply**

## 6.3

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

### 6.3.1

The Company has a Human Rights Policy document of Goodhope Asia Holdings LTA No GAHL.SP.0222 issued on July 15, 2022 which includes for example the following:

- Respect all rights and freedoms as stated in the Universal Declaration of Human Rights (UDHR) including the rights to privacy, association, social and cultural security, freedom of expression, freedom from interference and equal rights to work, health and education.
- Employees have the right to join associations and trade unions and to bargain collectively.



- All forms of coercion, trafficking or child labor are prohibited.
- Discrimination is prohibited and equality of opportunity and treatment is promoted.

The company also showed the socialization of the policy, for example on October 5, 2022 to employees and stakeholders with a total of 30 participants. Based on interviews with workers in plantations, factories and local contractors, it can be concluded that stakeholders understand the policies that are owned by the company and are conveyed in Indonesian.

The company already has a labor union which was formed in 2015 with no. Decree No. 003/SK/PC/F/SPPP-SPSI/KTM/X/2015 from the management of the branch of the agricultural and plantation workers union SPSI Kotawaringin Timur district dated October 23, 2015. The registration of trade unions at the Manpower Office of Kotawaringin Timur district is based on a charter from the Head of the Manpower Office of Kalimantan Tengah Province dated February 10, 2016. The organizational structure of the union consists of a chairman, deputy chairman, secretary, and treasurer. In addition, there is the Indonesian Prosperous Labor Union with a registration number in the Kotawaringin Timur Manpower Office No. 560.567/95/HI-Kesja/I/2018 dated January 30, 2018.

### 6.3.2

The results of interviews with representatives of trade unions, it is known that meetings with management are held regularly every month. The company has shown the recording of the meeting with the union in 2021. Some examples of the minutes of the meeting between the union and the company include:

- The December 2021 Bipartite Meeting held on December 29 at TPE & SWE with the main topic of discussion regarding input from several employees so that in the future leave for workers who are not harvest workers can be cashed, complaints about product prices at agromarts which are relatively more expensive than in Sampit and goods at agromart are relatively incomplete. The meeting was attended by 15 representatives consisting of management and workers.
- The January 2022 Bipartite Meeting was held on 20 January 2022 with the issue of discussion regarding the plan to close the stalls owned by the workers. The meeting was attended by 16 representatives consisting of management and workers.

Based on the documents shown, it is concluded that the company has documented the activities of meetings between workers and the company.

### 6.3.3

The company already has a labor union which was formed in 2015 with no. Decree No. 003/SK/PC/F/SPPP-SPSI/KTM/X/2015 from the management of the branch of the agricultural and plantation workers union SPSI Kotawaringin Timur Regency, dated October 23, 2015. The registration of trade unions at the Manpower Office of Kotawaringin Timur district is based on a charter from the Head of the Manpower Office of Kalimantan Tengah Province dated February 10, 2016. The organizational structure of the union consists of a chairman, deputy chairman, secretary, and treasurer. In addition, there is Serikat Buruh Sejahtera Indonesia (SBSI) with a registration number in the Kotawaringin Timur Manpower Office No. 560.567/95/HI-Kesja/I/2018 dated January 30, 2018.

The results of interviews with SPSI workers union officials and workers in the company area (members) stated that union officials are directly elected by workers who join the union. The management does not interfere in the election of the union board.

<b>Status: Comply</b>
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## 6.4

### Children are not employed or exploited.

#### 6.4.1 and 6.4.4

The company has a document of Ethical Behavior and Employment Standards Policy Goodhope Asia Holdings LTANo GAHL.SP.0322 issued on July 28, 2022 which includes for example the following:

- Maintain a work environment that is free from discrimination and promotes fair and impartial care for all individuals regardless of gender, race, age, disability, religion, nationality or sexual orientation.
- Prohibit all forms of forced, trafficked or child labour.

The company also showed the socialization of the policy, for example on October 5, 2022 to employees and stakeholders with a total of 30 participants. Based on interviews with workers in plantations, factories and local contractors, it can be concluded that stakeholders understand the policies that are owned by the company and are conveyed in Indonesian.

The implementation of the policies that are owned has been stated in the contracts held with third parties, for example, SPK for the transportation of CPO and PKO with No. PKS/SBM/CPO-PKO-TRANSPORT/II/2021/003 dated March 1, 2022 which includes the terms clause, General provisions and obligations that apply to contractors include the following:

- In letter A point 9, the contractor will not employ workers/employees/contractors/agents/representatives under the age of 18 years and may not be involved in any labor trading activities.
- In letter E point 41, the contractor must comply with applicable laws and will not violate state laws or regulations, including the law on human rights.

### 6.4.2

The company shows a list of all employees for the period of September 2022 which also informs the date of birth and date of acceptance of work. From the verification of these documents, it is known that there are no employees who come to work under the age of 18 years. Based on interviews with management representatives, it was stated that in terms of recruiting workers, prospective workers are required to complete an ID card as one of the recruitment requirements. The ID card is one way to verify the age requirements of prospective workers. From the results of field observations on spray, harvesting, fertilizer, and other activities, it is known that there is no indication of the use of underage labor.

### 6.4.3

Based on the verification of worker register documents as well as interviews with trade unions and workers, it is known that there are no young workers, all workers are over 18 years of age. In addition, for the 2022 period, there are no students who do internships at PT Agro Bukit.

**Status: Comply**

## 6.5

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

### 6.5.1 and 6.5.2

The company has a document of Ethical Behavior and Employment Standards Policy Goodhope Asia Holdings LTANo GAHL.SP.0322 issued on July 28, 2022 which includes for example the following:

- Consider and address the needs and interests of female employees to promote equality of opportunity regardless of gender.
- Implement practices to help overcome obstacles faced by women and promote women's inclusion and career advancement.
- Ensure confidentiality and protection from victimization or harassment.

The company also showed the socialization of the policy, for example on October 5, 2022 to employees and stakeholders with a total of 30 participants. Based on interviews with workers in plantations, factories and local contractors, it can be concluded that stakeholders understand the policies that are owned by the company and are conveyed in Indonesian.

The company already has a gender committee as stated in the Decree No. 059/GMO/PT.AB/SK-HR/2022 dated 10 September 2022 regarding the Appointment of PT Agro Bukit Women's Committee Management for the period 2022 - 2024. Based on interviews with representatives of the gender committee and women workers, it was stated that there were no issues related to harassment or abuse. sexual violence in the last 2-3 years.

The company also shows requests for maternity leave, for example, personnel with the initials UPPY who apply for maternity leave from 15 August – 15 November 2022. From the results of interviews with female workers such as spray workers, it was stated that the company has provided socialization related to reproductive rights protection policies (H1 and H2).

### 6.5.3

Based on the results of interviews with management and company doctors, the identification of the needs of young mothers is based on the results of examinations of mothers who have just given birth. Every mother who has just given birth will be given a Maternal and Child Health Book. The book explains the examination of mothers and children, socialization related to child care, early detection of high-risk mothers, immunization records and others.

The results of interviews with female workers (spray workers, maintenance workers and landfill workers) revealed that none of these female workers had children who were breastfeeding (<2 years old).

**6.5.4**

The company has a mechanism for handling complaints, which respects anonymity and protects whistleblowers as stated in the Circular, number 006/HR-RO/V-2011, regarding the Grievance Handling Guide, dated 4 May 2011 which was approved by the Head of HR Operations. This circular explains in detail the background, aims and objectives, guidelines, policy and process inputs (informal complaint handling procedures, official complaint handling procedures, GRP appointments and record keeping). The Guidelines explain that all types of employee complaints related to employment relations, terms of employment and other issues should be notified to the individuals concerned at the earliest possible stage and resolved in their work environment.

Regarding the anonymity and protection of whistleblowers, it has been guaranteed in the Guideline point 1.8, that management must ensure that employees are guaranteed non-disclosure of information related to complaints submitted by employees.

The Circular also provides an avenue for workers to report complaints against supervisors to someone other than the supervisor which states that "when complaints are related to functions and/or employees feel more comfortable contacting the HR Department, problems can be submitted to the HR Department" In addition, from the results of interviews with trade unions, complaints can also be submitted through trade union representatives.

The results of interviews with workers such as harvesting, spraying, warehouse staff, fertilizers and others, it is known that workers have understood the mechanism if there are complaints. The results of the verification of the complaint document, it is known that there have been no complaints from external stakeholders, while there were several complaints from workers in that period, for example, those submitted on August 10, 2022 by personnel with the initials YP who worked as harvesters of the Sungai Lenggana Estate with complaints that they did not know the premium calculation. / Incentives for pruning activities. Furthermore, the company conducted a socialization of premiums/incentives for pruning activities on August 12, 2022 during the morning briefing.

	<b>Status: Comply</b>	
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**6.6**
**No forms of forced or trafficked labour are used.**
**6.6.1 and 6.6.2**

Based on the verification of the labor register document, it is known that all plantation and factory employees consist of permanent workers (SKU-H and SKU-B) and probationary workers. The company has shown examples of agreements with employees on probation, such as:

- Employment Agreement (Probation Period) No. GMO/HRD/VIII/2022/00MGM dated September 9, 2022 explained that personnel with the initials PPM conducted a trial period from September 10 – December 9, 2022 in harvesting activities.
- Employment Agreement (Probation Period) No. GMO/HRD/VIII/2022/00MGM dated September 9, 2022, explained that personnel with the initials BM conducted a probationary period from September 10 – December 9, 2022 in harvesting activities.

The company also uses contractors for work that is seasonal (not done continuously) and is also intended for social purposes (helping local residents to be able to work). Contractors used by the company for transportation activities such as transporting CPO/PK, transporting FFB, heavy equipment and others.

	<b>Status: Comply</b>	
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**6.7**
**The unit of certification ensures that the working environment under its control is safe and without undue risk to health.**
**6.7.1**

Certification Unit has shown the Decree of the Head of the Office of Manpower and Transmigration of Central Kalimantan Province No: KEP.40/DISNAKERTRANS/IV/2021 concerning the Ratification of the K3 Committee of PT Agro Bukit with the composition of the chairman with the initials S and the Secretary of the K3 Committee with the initials ASJ with the Appointment Decree (SKP). ) Ministry of Manpower of the Republic of Indonesia Number 5/11643/AS.02.04/XI/2020 set in Jakarta on November 27, 2020 and the validity period is 3 years from the date of stipulation.

The Secretary of the OHS Committee already has an OHS expert authority card with No. 13595/PK3/AJ/62/2020/P2 which is valid until November 27, 2023. In addition, the OSH Committee regularly holds monthly meetings, no later than August 29, 2022 and reports every 3 months to the Manpower and Transmigration Office. Report on the implementation of OHS committee activities and work accidents at PT. Agro Bukit Period April-June 2022 with number 402/ABCK/VII/2022 with proof of submission received by the

Manpower and Transmigration Agency of the Central Kalimantan Provincial Government on July 25, 2022.

The company also shows OHS license monitoring, such as:

Name	Certificate/Licence Number	Expiration Date
Tumiran (Backhoe Loader Operator)	Reg P.10.1745-OPK3-LT/PAA/VI/2019	13-Jun-24
Agus Budiono (Excavator Operator)	Reg.12.39135-OPK3/LT-PAA/II/2022	17-Jan-27
Budi Santoso (Tractor Operator)	Reg.54430-LT/PAA/VII/2020	03-Jul-25
Anthony Gultom (Excavator Operator)	Reg P.10.1776-OPK3-LT/PAA/VI/2019	13-Jun-24
Agustinus Jhon (Excavator Operator)	Reg P.10.1823-OPK3-LT/PAA/VI/2019	13-Jun-24
Suyanto (Excavator Operator)	Reg P.10.1825-OPK3-LT/PAA/VI/2019	13-Jun-24
Ngaliwon (Operator Compactor)	Reg P.10.2494-OPK3-LT/PAA/VI/2019	13-Jun-24
Turah (Operator Wheel Loader)	Reg.12.39134-OPK3/LT-PAA/II/2022	17-Jan-27
Damak (Operator Traktor)	Reg P.10.2511-OPK3-LT/PAA/VI/2019	13-Jun-24
Wiyanto (Operator Backhoe Loader)	Reg.52859LT/PAA/VII/2020	03-Jul-25
Ruswanto (Operator Sterilizer)	Reg.89201-OPK3-LT/PAA/XI/2018	12-Nov-23
Saprudin (Operator Traktor)	Reg.129901-OPK3-LT/PAA/XI/2018	19-Nov-23
Sulis Setiawan (Operator Tractor)	Reg.89208-OPK3-LT/PAA/XI/2018	12-Nov-23
TeguhImanulloh (Operator Traktor)	Reg.129899-OPK3-LT/PAA/XI/2018	19-Nov-23
Usman Simarmata (Operator Boiler)	Reg.89206-OPK3-LT/PAA/XI/2018	12-Nov-23
Wahyu Arisman (Operator Boiler)	Reg.89207-OPK3-LT/PAA/XI/2018	12-Nov-23
Amordiano (Operator Excavator)	Reg.129900-OPK3-LT/PAA/XI/2018	19-Nov-23
Azizad Aziz (Operator Sterilizer)	Reg.89202-OPK3-LT/PAA/XI/2018	12-Nov-23
Ilyas (Operator Sterilizer)	Reg.89200-OPK3-LT/PAA/XI/2018	12-Nov-23
Jimi Mangilong (Operator Traktor)	Reg.129898-OPK3-LT/PAA/XI/2018	19-Nov-23
Ari Permana (Operator Genset)	Reg. 89612-OPK3-LT/PAA/IV/2019	30-Apr-24
Nadirun (Operator Genset)	Reg. 89611-OPK3-LT/PAA/IV/2019	30-Apr-24
Ruslan (Operator Sterilizer)	Reg.89203-OPK3-LT/PAA/XI/2018	12-Nov-23

Based on information from the results of the document review, it shows that the person in charge of OHS Committee (Occupational Safety and Health Committee) has been identified and there is a record of periodic meetings between the person in charge and the workers. The interests of all parties related to safety, health, welfare is discussed at the meeting and any issues that arise are recorded. The results of interviews with the Manpower and Transmigration Office revealed that the company had submitted a OHS Committee report every 3 months and the report had covered all occupational health and safety activities in the company's operational activities.

#### 6.7.2

Certification Unit has demonstrated environmental procedure documents related to emergency preparedness and response. Accident and emergency procedures are listed in the Accident Emergency Response document, document number SOP.EHS.ERP-02, Revision 00/ dated 04-05-2015 approved by the Technical Director regarding explanation of objectives, definitions, duties and responsibilities, procedures related to forms/records, related references and attachments.

The explanation of emergency response procedures includes, among others, the objectives, scope, references, definitions, duties and responsibilities of the emergency response team, procedures for controlling and reporting stages, post-condition handling procedures and attachments, including an emergency response organizational structure chart. In addition, it also explains about emergency response related to fire, natural disasters and riots.

The results of field observations on harvesting, spraying, and fertilizer activities showed that the foreman brought the first aid kit in an amount according to the doctor's recommendation. In addition, the company also has emergency response equipment such as fire extinguishers (APAR), hydrants, first aid kits, and others. The company also shows documents for routine emergency response equipment inspections.

The company already has SOPs covering all potential major emergencies, such as, but not limited to fires, chemical spills, and potential natural disasters specific to the area, e.g. earthquakes, volcanoes, etc. The company has emergency and work accident response procedures regarding investigations and actions taken to prevent accidents from happening again. The company already has officers assigned and trained in First Aid in factories and estates. Unit management has conducted first aid and occupational safety training on August 2, 2022 with a total of 20 participants. Company already has a first aid kit at the factory, office and a complete first aid bag and is checked regularly in accordance with legal requirements which the foreman brings every day while working and has documented all work accident activities in factories and estates which are stored and reviewed regularly, the last review being carried out in September 2022.

Based on information from the results of field visits that the company already has a gathering point in the factory and estate and has an evacuation route at the factory, during harvesting, spraying, and fertilizing activities, it shows that the foreman brought the first aid kit in the amount recommended by the doctor. In addition, the company also has emergency response equipment such as fire extinguishers (APAR), hydrants, first aid kits, and others. The company also shows documents for routine emergency response equipment inspections.

Based on information from interviews with the special management unit for workers, that the instructions on how to respond to emergency and work accidents have been clearly understood by all workers in factories and plantations.

### 6.7.3

The company has shown the handover documents for PPE in 2022 for Sungai Binti POM, Sungai Binti Estate, Sungai Lenggana Estate, Tanah Putih Estate and Sawahan Estate. information that the company has replaced damaged PPE in August 2022. The company has shown records of giving/handing over PPE in the 2022 period, some examples of handover evidence include:

- **Sungai Lenggana Estate:**
  - Proof of handover of PPE for Harvester workers in the form of Safety Boot, harvesting tool on September 2, 2022 with a total of 2 workers.
  - Proof of handover of PPE for Harvester workers in the form of Safety Boot, Safety Helmet, harvesting tool, *Angkong* (handcart), Hook, gloves, on September 1, 2022 with a total of 4 workers.
  - Proof of handover of PPE for Sprayer workers in the form of masks (NP-22), and safety boots, on March 17, 2022 with a total of 11 workers.
  - Proof of handover of PPE for Sprayer workers in the form of Rubber Gloves, dated August 13, 2022 with a total of 7 workers.
  - Proof of handover of PPE for fertilizer workers in the form of cotton gloves and rubber gloves on May 14, 2022 with a total of 2 workers.
- **Sungai Binti POM**
  - Proof of handover of PPE for Process workers in the form of Safety Shoes, dated July 4, 2022 with a total of 46 workers
  - Proof of handover of PPE for Process workers in the form of masks and earplugs, on October 6, 2022 with a total of 46 workers
  - Proof of handover of PPE for Laboratory workers in the form of Safety Shoes, dated July 4, 2022 with a total of 17 workers
  - Proof of handover of PPE for Laboratory workers in the form of masks and earplugs, on October 6, 2022 with a total of 17 workers.
  - Proof of handover of PPE for Mechanic workers in the form of Safety Shoes, dated July 4, 2022 with a total of 19 workers.
  - Proof of handover of PPE for Mechanic workers in the form of masks and earplugs, on October 6, 2022 with a total of 19 workers
  - Proof of handover of PPE for Electricity workers in the form of Safety Shoes, dated July 4, 2022 with a total of 4 workers.
  - Proof of handover of PPE for Electricity workers in the form of masks and earplugs, on October 6, 2022 with a total of 4 workers
  - Proof of handover of PPE for Cleaning Mill workers in the form of Safety Shoes, dated July 4, 2022 with a total of 15 workers.
  - Proof of handover of PPE for Cleaning Mill workers in the form of masks and earplugs, on October 6, 2022 with a total of 15 workers.

The results of field observations on plantation and factory activities (eg harvesting, spraying, fertilizer, factory processes) revealed that the company had provided PPE to workers in accordance with the results of the risk analysis identification that had been carried



out, including for workers at risk of exposure to chemicals and high noise risk. From the interviews, it is known that the provision of PPE such as shoes is carried out 2 times a year. Furthermore, if the PPE is damaged before the PPE replacement period, the company will replace the PPE on the condition that the worker can show evidence of the damaged PPE.

The results of field observations in the warehouse area, it is known that the company also provides sanitation facilities for workers who use pesticides and other chemicals such as a place for bathing and storage of PPE and work tools. The company already has a rinse house facility in the estate as a sanitation facility for spray workers, fertilizing workers and handling waste water from sanitation facilities to avoid soil or water pollution.

The company has disseminated safe work practices and is trained in the use of PPE to all workers involved in the operation of spraying, fertilizing, harvesting activities that have been properly trained. Some examples that the company has done include socializing the use of PPE in September 2022, in SLE with 20 participants, in SBE with 18 participants, in SWE with 20 participants and in TPE with 21 participants.

Based on the results of field observations in Division 4 Block C14, Sawahan Estate, it was known that there were 4 harvesters with carrying helmets in FFB harvesting activities but did not use helmets when transferring FFB produce to Collecting Point. Likewise, Grader Operators and tractor operators carry helmets but do not use helmet PPE when driving heavy equipment. The results of the document review show that the company has provided PPE in the form of helmets, boots, gloves and egrek gloves with proof of the handover of the PPE on July 4, 2022. The company has also inspected/monitored the use of PPE every month which aims to ensure employees comply with the company rules in terms of OHS. Based on this, the company has the opportunity to ensure that workers use appropriate personal protective equipment (PPE) as protection in all operations that have potential hazards, especially harvesting activities and lifting and transport operators. **OFI**

### 6.7.4

The company shows a list of all employees for the September 2022 period as many as 2,464 people who have also been registered in health insurance and work accidents which are shown in Social Security Agency of Health and Employment payments, for example in the August – September 2022 payment period, namely:

- Proof of *BPJS* Manpower payment for the period August 2022 which was paid on 12 September 2022 for 2,464 workers.
- Proof of payment for the Social Security Agency of health on September 8, 2022 which is for the period October 2022 for 2,464 workers.

The results of field observations to the workers' facilities area, it is known that the company also has clinics and paramedics consisting of doctors, nurses and paramedic.

### 6.7.5

The company has shown that work accident reports have been reported using the EHS Monthly Report document for LTI Safety Performance metrics created by the secretary of the OHS Committee, informing the accident period number, the document informing, among other things, data collection and monitoring (unit management, number of time injury cases). missing). (LTI), the number of time injury not lost (LTI) cases, the number of accident cases, the number of hours worked, the total frequency level and the savings rate based on the verification document, among others, are as follows:

LTA analysis period April 2021 – March 2022 for each unit, as follows:

- TPE : Frequency Rate 0 Severity Rate 4.36
- SBE : Frequency Rate 0 Severity Rate 2.59
- SWE: Frequency Rate 0 Severity Rate 4.16
- SLE : Frequency Rate 0 Severity Rate 2.01
- SBM : Frequency Rate 0 Severity Rate 3.02

Based on the information on the results of the document review, the company has shown a record of work accidents using LTA calculations. Based on the TPE work accident recording data for the period April 2021 – March 2022, it is known that the LTA analysis with FR 0 and SR 4.36. SBM Estate work accident recording data for the period April 2021 – March 2022, it is known that the LTA Analysis with FR 0 and SR 3.02.



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**

Certification Unit has standard operating procedures regarding pest and disease control in Mature Crops. The SOP explains several points regarding pest and disease control, including several examples of discussions about disease symptoms, prevention of treatment of diseased trees, types of pests that often cause damage in crop areas, early observation systems (EWS), pest eradication, evaluation of census results. observation, identification and symptoms of disease, census methods, attack criteria, prevention, and control methods.

The control system used by ACA (Alert, Census, Action), is as follows:

- Monitoring of rats through POM grading, Collecting Point grading, and harvesting (harvest reports)
- Detection of leaf-eating caterpillars and rats was carried out by the agronomy department randomly every month in 4 estates as the basis for further actions (census and control). Detection is done by visual observation of the main roadside with a threshold; 10 leaf-eating caterpillars / midrib (small size), 5 leaf-eating caterpillars / midrib for large size, 5% attack on rats from the census, for horn beetle attacks above 10% (Mature Plant)
- Biological control by planting beneficial plants (*Cassia cobanensis*, *Antigonon leptopus*, and *Turnera subulata*) for leaf eating caterpillars, using owls (*Tyto alba*) to control rat populations.

Integrated pest control procedures are contained in the Objective and Monitoring Procedure in Pest and Disease Management in Mature Oil Palm Procedure, namely:

- To prevent Pest and Diseases (P&D) outbreaks within the plantation by adopting good agricultural practices; actively monitor P&D build-up and if so required, implement an effective control measure in order to minimize the potential loss of yield due to outbreak.
- To achieve maximum crop yields with minimal application of agrochemicals.
- Integrated Pest Management (IPM) principles are to be adopted in formulating desirable P&D control strategy and biological control agents like Barn Owls are encouraged
- Estate Management needs to generate awareness of the importance for the earliest detection of P&D.
- Appropriate judicious weed management methods shall be adopted and beneficial plants e.g. *Cassia cobanensis* and *Turnera subulata* planted at strategic locations to encourage build-up of natural predators. Soft grasses shall be promoted in interlines and do not destroy soft weeds unnecessary or perform chemical spray indiscriminately (i.e. bare earth policy) especially in areas with previous history of outbreak.
- Action stage do not carry out indiscriminate insecticide spraying. Treatment shall only be undertaken out as soon as pest level exceeds the critical level

Some information on the results of the pest census in September 2022 include the census of rat attacks with a total of 15.68% rat attacks (Total 14 blocks checked, 5161 oil palm trees, 809 trees affected by rats) using OWL occupancy of 15.16%, *Rhinoceros orcytes* attack of 3-4% (Total 81 blocks checked), *Ganoderma* attack amounted to 0.61% (Total 268 Blocks checked, 1,107,629 oil palm trees and 6,735 trees affected by *Ganoderma* attack), leaf eater caterpillar attack 3-4% with a total of 46 blocks checked

**PT Agro Bukit Rat Attack Census Document for Sept-2022**

Estate	Total Blocks Checked	Total Palm Tree Checked	Rat Attack		Occupancy Owl
			Total	%	
TPE	3	1176	162	13,78%	25%
SBE	6	2396	396	16,53%	19%
SWE	1	293	55	18,77%	7%
SLE	4	1296	196	15,12%	9%
Agro Bukit	14	5161	809	15,68%	15,16%

Against this situation, for example rat attacks, where previously the number of attacks was 15.68%, the company has taken biological action by using owls with a decrease of 15.16%. In addition, the company also took chemical action by sprinkling rat poison at several points to suppress more rat attacks.

#### Block Census of Ganoderma Attack Todate PT Agro Bukit to 30-Sept-2022

Estate	Total Block	Total palm Check	Infected Block	%Infected Block	Life Palm	Dead Palm	Total Palm	%Life Palm	%Dead Palm	%Total Palm	Palm Treated
TPE	116	129.289	31	27%	63	268	331	0,05%	0,21%	0,26%	3
SBE	123	307.714	72	59%	84	529	613	0,03%	0,17%	0,20%	-
SWE	144	332.245	83	58%	347	859	1.206	0,10%	0,26%	0,36%	-
SLE	108	338.372	82	76%	1.677	2.908	4.585	0,50%	0,86%	1,36%	2.924
Agro Bukit	491	1.107.620	268	55%	2.171	4.564	6.735	0,20%	0,41%	0,61%	2.927

From the results of monitoring the use of pheromone trapping, there were 12 rhino beetle attacks in SLE in September 2022 at Block J31 Division 2. And based on field visits that the use of 1 pheromone trap is carried out in the field to represent 2 hectares of which the intensity of rhino beetle attack is 10% of the land area per hectare.

#### 7.1.2

Certification Unit uses useful plants to control leaf-eating caterpillars pests by planting and maintaining beneficial plants such as *Turnera subulata* and *Antigonon* which grow naturally and are maintained by the company. The unit of certification does not use introduced invasive species in accordance with Minister of Environment and Forestry regulations No. P.94/MENLHK/SEKJEN/KUM.1/12/2016. Regarding Invasive Types, the company can show records of monitoring of Beneficial Plants in monitoring their spread, such as *Antiginon leptopus*, *Turnera subulata* and *Cassia cobanensis*.

#### 7.1.3

Based on information from document studies, field observations, and interviews with workers and stakeholders, pest control measures for the period 2021 and January to September 2022 were found to contain no pests that exceeded the attack threshold value. Based on the results of interviews with workers, the Plantation Service and field visits, it was found that there was no information on the use of fire for pest control in the last 1-2 years.

Status: Comply

#### 7.2

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

#### 7.2.1

Certification Unit has demonstrated the Pests & Diseases procedure, Ref. Code: OP/C21/05/14/04, including recommendations for materials and dosages for disc spray and pickle markets, Plant Utilization and Weedicide Phytotoxicity, calibration, application width and height, Do not dispose of excess mixture, chemicals or infield containers. See label recommendations and company policies for handling, storage and disposal guidelines. Use Herbicides and Pesticides when really needed and wisely on target pests. The company has developed IPM as an alternative to using pesticides.

The company's basis for choosing pesticides for chemical control is Crop Protection Recommended. The recommended chemical is registered with the pesticide commission and is not included in the WHO class 1A and 1B lists. Some examples of applications that are in accordance with the recommendations found during field observations, interviews, and document review such as the application of Supremo to control broadleaf weeds, narrow leaf weeds, Ally to control broadleaf weeds., and coumatetralyl for rat control.

The company has used pesticides that have been registered with the Pesticide Commission of the Ministry of Agriculture. Based on the study of documents and observations in the agrochemical warehouse, the pesticides used at PT Agro Bukit include:

- Supremo, the active ingredient is *Isopropylamine Glyphosate* 480 g/l with RI registration number. 01030120021712 which is valid until April 20, 2027 to control broadleaf weeds, narrow leaf weeds.
- Ally, the active ingredient is *Metsulfuron methyl* 20 WG with RI registration number. 01030120031897 which is valid until March 20, 2026 to control broadleaf weeds.
- Garlon, the active ingredient is *Triclopir* 480 g/l with RI registration number. 01030120155320 which is valid until February, 2025

to control saplings.

- Capture 100 EC, active ingredient Cypermethrin 100 g/l with RI registration number. 01010120072927 which is valid until 30 January 2023 to control nettle caterpillar and *Oryctes rhinoceros* pests.

Some examples of pesticide materials used by PT Agro Bukit with details of active ingredients, classification, registration numbers and others until September 2022

No	Trade Name	Type	Active Ingredients	Classification WHO	Remark	ID Number Registration	Validity period	Use
1	Round Up/Supremo/Best Up/ Amiphosate	Systemic	Isopropilamina glifosate 480 g/l	class III	Minor Danger	RI 01030120021712	20-Apr-27	Weeds In The Circle Path
2	Ally/Trendy/Along/Amiron	Systemic	Metsulfuron methyl 20 WG	class III	Minor Danger	RI 01030120031897	20 Maret 2026	Neprolephis And Ageratum
3	Garlon/Treister/Dalopir	Systemic	Triclopir 480 g/l	class III	Minor Danger	RI 01030120155320	Februari 2025	Woody Growth
4	D-Amine/Abolisi	Systemic	2,4-D Dimetil amina 865 g/l	class II	Moderate Danger	RI 01030120062199	15 Maret 2023	Asystasia
5	CAPTURE 50 EC	direct /contact	Cypermethrine 50 g/l	class II	Moderate Danger	No Stock	No Stock	Oryctes
6	CAPTURE 100 EC	direct /contact	Cypermethrine 100 g/l	class II	Moderate Danger	RI 01010120072927	30 Januari 2023	Oryctes
7	Manthene /Chepate	Systemic	Asefat 75 SP	class II	Moderate Danger	RI 01010120072671	09-Apr-26	Nettle Caterpillars
8	Regent	Systemic	Fipronil 50 g/l	class II	Moderate Danger	RI 1192/12-2005/T	N/A	Termite

## 7.2.2

Certification Unit has shown documentation of the use of pesticides by PT. Agro Bukit Perioe 2022, the following is an example of the use of Pesticides in the Sungai Lenggana Estate in January - September 2022:

Trademark	Active Ingredients	Pesticide Use (Kg)	Active Ingredients (Kg)	FFB Production (Ton)	LD 50 (Kg/Total Active Ingredients/Ton FFB)
Supremo	Isopropilamina Glyphosate	2,499.35	1,199.69	38,182.30	0.000000011
Ally	Methyl metsulfuron	76.64	1.53	38,182.30	0.000006548
Garlon	Triclopir	26.82	12.87	38,182.30	0.000000011
D-Amine	Dimethyl amine	18.07	15.63	38,182.30	0.000000004
Capture 100 EC	Cypermethrine	-	-	38,182.30	-
Manthene 75 SP	Acephate	-	-	38,182.30	-
Regent	Fipronil	1.00	0.05	38,182.30	0.000001048
Rait Bait	Coumatetryl	31.00	0.01	38,182.30	0.000024104
Weed Solution	Sodium Amide	-	-	38,182.30	-

The use of Pesticides in the Sungai Binti Estate in January - September 2022:

Trademark	Active Ingredients	Pesticide Use (Kg)	Active Ingredients (Kg)	FFB Production (Ton)	LD 50 (Kg/Total Active Ingredients/Ton FFB)
Supremo	Isopropilamina Glyphosate	974.42	224.51	35,423.52	0.000000012
Ally	Methyl metsulfuron	40.39	0.81	35,423.52	0.000007057
Garlon	Triclopir	7.53	1.73	35,423.52	0.000000012
D-Amine	Dimethyl amine	-	-	35,423.52	-
Capture 100 EC	Cypermethrine	-	-	35,423.52	-
Manthane 75 SP	Acephate	-	-	35,423.52	-
Regent	Fipronil	-	-	35,423.52	-
Rait Bait	Coumatetryl	-	-	35,423.52	-
Weed Solution	Sodium Amide	-	-	35,423.52	-

Based on information from the results of document review and interviews with chemical workers SLE, SWE, TPE and SWE , it was concluded that workers knew about the function of chemicals used and were selective in spraying activities and did not use paraquat-based pesticides.

### 7.2.3

The company does not use pesticides prophylactically. The company only controls using pesticides if the results of the pest attack census are above the threshold. If it is still below the threshold, the company will not use chemical control. In terms of biological control of leaf-eating caterpillars pests, the company plants and maintains natural enemies of UPDKS pests, such as *Turnera subulata*, *Casia Cobanensis*, and *antigonon*. stated in the beneficial plant monitoring document with the realization of 125 *Cassia Cobanensis* plants in block A12 on the west MR line at TPE, 126 blocks in A13 on the CR 12/13 line. Beneficial plant with plant realization in SLE as many as 108 blocks J28 and 87 blocks K29 in SLE.

The company has shown records of pesticide use for the period 2021-2022, as an example of which data on pesticide use in Sungai Lenggana Estate is as follows:

Active Ingredients	Material Usage per year	
	January-Desember 2021	January – September 2022
Methyl Metsulfuron(Kg)	90.09	76.64
Triclopyr (Litre)	30.72	26.82
Chepate (Kg)	1,174	-

The company has shown records of pesticide use for the period 2021-2022, as an example of which data on pesticide use in Sungai Binti Estate is as follows:

Active Ingredients	Material Usage per year	
	January-Desember 2021	January – September 2022
Methyl Metsulfuron(Kg)	67.84	40.39
Triclopyr (Litre)	25.57	3.61
Isopropilamina Glifosate	2,066.41	974.42
Dimetil amina (Kg)	3.30	-

Based on the data above, it is known that there has been a decrease in the use of pesticides, including the reduction in the use of pesticides with the active ingredients of *Methyl Metsulfuron*, triclopyr and Dimethyl amine. In addition, the company also uses chemicals for weed control on a regular basis. Based on information from management, it is known that the application method is not a preventive application, but is selective for locations that have weeds

#### **7.2.4**

Certification Unit does not use pesticides in a preventive manner to prevent pests and diseases. The company controls using pesticides if the results of the pest attack census are above the threshold. If the attack of pests and diseases is still below the threshold, the company does not use chemical control.

#### **7.2.5**

Based on information from visits and document reviews that the company does not use pesticides registered with the World Health Organization (WHO) Class 1A or 1B or included in the Stockholm or Rotterdam Conventions, as well as paraquat, except in exceptional circumstances validated by a due diligence process, or where permitted by the competent authority to deal with pest population explosions (plagues). From the results of the review of the pesticide use document from January to September 2022 up to the audit activity, it is known that there is no use of pesticides in the POPS (Persistent Organic Pollutants) categories, WHO Class 1A and Class 1B.

#### **7.2.6**

The certification unit has shown a document regarding the SOP for the Management of Hazardous and Toxic Materials with the document number SOP.EHS.BBB-01 Revision 01 dated July 16, 2018. The company demonstrated several trainings, including:

- Fertilizer application training on December 6, 2022, which was attended by 39 fertilizer employees
- Training for spraying personnel at Sungai Lenggana Estate in Block H29 on 12 August 2022, which was attended by 9 spray employees.
- Training for spraying personnel at Sawahan Estate in Block J9 on 11 August 2022, which was attended by 5 spraying employees.
- Training for spraying personnel at Tanah Putih Estate in Block B7 on August 12, 2022, which was attended by 9 spray employees.
- Training for spraying personnel at Sungai Binti Estate in Block C45 on 12 August 2022, which was attended by 9 spray employees.
- Manuring staff training at Sawahan Estate in Block H9 on January 10, 2022 with 7 participants

Company has documented the plan and realization of the training, and the training carried out has been understood by workers in the application or handling of pesticides accompanied by documents that prove that the training was carried out in 2022. In the use of pesticides/application of pesticide applications by workers that workers have completed training on the use of pesticides and the use of PPE.

Based on the results of interviews with spray workers, it is known that PPE is provided free of charge by the company in the form of gloves, apron, glasses, masks, safety shoes, helmets. Workers also store and wash work tools in a washing place (Rinse House) provided by the company (work tools are not brought home). Workers also understand the technical activities of workers by explaining work techniques starting from how to spray, target weeds, and avoid spraying in river border areas. (As for the onsite audit, there was no spraying activity). From the results of field observations in the spraying activity, it is known that workers already understand the use of PPE, technical work, and handling of chemical hazards.

The company has used pesticides according to product labels and based on field visits to chemical warehouses, it was found that each pesticide has an MSDS in Indonesian

#### **7.2.7**

The Certification Unit has shown documents related to chemical/pesticide handling procedures contained in document No. SOP.EHS.BBB-01 regarding the management of hazardous and toxic materials. The SOP regulates the handling of chemicals, among others that storage is carried out according to the recommendations provided in the MSDS, the placement of chemicals that have dissimilar characteristics must be separated according to the MSDS recommendations, the preparation and release of chemicals is carried out first in first out (FIFO), chemical containers must have a label, chemicals are only issued on request approved by the authorities.

Records of storage and release of agrochemicals (including pesticides) are contained in the following documents:

- Checklist for monthly environmental and OHS inspections of pesticide and fertilizer warehouses.
- List of hazardous and toxic materials used.
- hazardous and toxic materials waste generator sheet.
- EHS briefings.

Pesticide packaging waste is stored in a hazardous and toxic waste disposal site that has a collection point permit according to the Decree of the East Kotawaringin Regent No.011/ODPMPTSP-PT/LB3/II/2021 dated February 3, 2021, valid for 5 years from the date of stimulation.

Based on field observations that the company has a special place for chemical storage which shows that the chemicals have been stored properly in accordance with the procedure. Chemicals are stored in a special place separate from others and placed according to their characteristics and have MSDS instructions/procedures in the chemical storage area. Chemical storage has been equipped with signage and hazardous symbols for chemicals by category, Material Safety Data Sheet, emergency response, first aid kit and personal protective equipment. The results of the interview concluded that spray workers are known to have understood the management of used chemical packaging, which is rinsed in a pesticide packaging washing place and then collected at a licensed hazardous and toxic waste disposal site.

### 7.2.8

Procedures related to the handling of chemicals/pesticides are contained in the document Number SOP.EHS.BBB-01 regarding the management of hazardous and toxic materials which stipulates that storage is carried out according to the recommendations provided in the MSDS, the placement of chemicals that have dissimilar characteristics must be separated according to the recommendations. MSDS, preparation and release of chemicals is carried out on a First in First Out (FIFO) manner, chemical containers must have labels, chemicals are only issued on request approved by the authorities. Records of storage and release of agrochemicals (including pesticides) are contained in the following documents:

- Monthly environmental and OHS inspection checklists in pesticide and fertilizer warehouses.
- List of hazardous materials used.
- Hazardous waste generation sheet.
- Meetings between management to discuss environmental and OHS issues.

The results of observations at employee housing estates revealed that it was not found that used pesticide packages were disposed of in landfills or reused for other purposes such as trash cans, flower pots and so on.

### 7.2.9

Based on information from the results of visits, document studies and interviews with management units of Sungai Binti Estate, Tanah Putih Estate, Sungai Lenggana Estate and Sawahan Estate, no pesticide application was found through the air application activities.

### 7.2.10

The company conducts special MCU for pesticide applicators regularly every 2 times a year with parameters of CHE, contamination, blood pressure, physical examination, personal hygiene, pregnancy test and dermatomycosis. The company also shows the latest MCU results documents, for example on the SWE sprayer team which was held on 5 July 2022 as many as 31 people with the results that 26 people were within normal limits and 4 people had hypertension. The company also showed follow-up documents from the employee, namely the administration of hypertension medication and health consultation to the 4 people

### 7.2.11

Based on information from field observations and interviews with the management unit, it is known that there are no workers under the age of 18 who work in the chemical field. Pregnant and lactating women are prohibited from working in the chemical field. If a pregnant woman is found, she will be diverted to a mild non-chemical activity. Menstrual leave is also provided by the plantation management in accordance with the company's clinical recommendations. Pregnancy detection is carried out by the company's clinic every semester with a rapid kit test to detect pregnancy and/or be informed directly by the employees themselves. Furthermore, the applicator also states that those who are detected positive will not be allowed to work with agricultural chemicals and will be shifted to manual maintenance work.

<b>Status: Comply</b>
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**7.3****Waste is reduced, recycled, reused and disposed of in ways that are environmentally and socially responsible manner.****7.3.1**

The company has identified waste resulting from operational activities contained in the SOP.EH.BBB-01 document related to the SOP for Hazardous Waste Management which was ratified on July 16, 2018. The identification is grouped based on activities that generate waste, name of waste, waste code, type of solid or liquid, and its management. The determination and classification of waste codes uses the reference to Government Regulation number 101 of 2014. The company also has several procedures related to waste management and utilization contained in the document Number SOP.EHS.LIM-01 related to Waste Management which was legalized on 12 June 2018.

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

**Hazardous and Toxic Waste**

In the management of hazardous and toxic waste, the company does not re-use it but only does temporary storage located at the Central Workshop of Sungai Lenggana Estate (SLE). The company also has a hazardous waste storage area that has a permit based on the DPMPTSP Decree of Kotawaringin Timur Regency Number 011/DMPPTSP-PT/LB3/II/2021 concerning the Temporary Storage Permit for Hazardous and Toxic Waste for PT Agro Bukit which was ratified on February 3, 2021 and is valid for 5 years.

The waste stored in the temporary storage warehouse will then be transported by a licensed party every 3 months. The last transportation was carried out on August 26, 2022, but the Manifest document has not yet been released. The company can show the manifest of the previous transportation and the minutes of the transportation by PT Semesta Langgeng Sentosa (PT SLS) which is a licensed party which was carried out on 27 May 2022. The company can show the cooperation agreement with the carrier, namely based on the document of the Cooperation Agreement Number PTAB/ C/377.21.2 which was made on May 14, 2021 and valid until May 14, 2023. The company can also show the legality documents of the carrier such as a valid transportation permit from the Ministry of Environment and Forestry, a license for special goods transportation from the Ministry of Transportation that is still valid, Business Identification Number which is still valid and the Cooperation Agreement between the carrier and the licensed processor and/or user.

Companies can also show documents for storing and handling Hazardous Waste in accordance with their SOPs and Government Regulation Number 101 of 2014. These documents include Manifest, balance sheet, and logbook. Based on the results of the document review by comparing the Manifest, the balance sheet and the logbook, it can be seen that the data on waste transported on 27 May 2022 was in accordance with the data recorded in the balance sheet and logbook for the period before the transportation was carried out. Similarly, the comparison between the months after the transportation was carried out (June 2022) starting from empty. The company records all waste that enters and leaves the warehouse properly so that waste management data can be tracked easily and there are no recording differences.

In addition to waste that is contaminated with chemicals, clinical waste is also managed by the company by being given special treatment, namely being transported immediately if the storage conditions are not sufficient. The company can also show an official report on the transportation of medical waste by a licensed party, namely PT SLS on August 26, 2022 and it will be submitted to PT Balikpapan Environmental Services as the processing party and/or licensed user.

The results of the field visit to the temporary storage warehouse for hazardous waste in SLE also show that the company has carried out hazardous waste management quite well. All obligations listed in the waste storage permit have been fulfilled, such as the availability of fire extinguishers, showers, eyewash, coordinates, alarms, first aid kits, oil traps and appropriate labeling. In addition to good lighting and air ventilation, the company also has drainage channels on the outside of the warehouse to anticipate pollution to the surrounding environment. The results of interviews with warehouse managers also show that managers fully understand the SOP for hazardous waste management and mitigation in case of potential pollution.

**Non-hazardous and toxic waste**

Non-hazardous waste such as domestic waste and used fertilizer sacks is managed in the form of reuse for goods that can still be used. In addition, waste that cannot be reused will be collected, if it still has economic value such as scrap metal and used tires, it will be sold or given to those in need. Non-hazardous waste that cannot be reused will be disposed of in landfills. Transportation of non-hazardous waste from employee housing or emplacement areas is carried out 2 - 3 times a week using dump trucks and immediately disposed of into landfills, and when the landfill is full, it will be stockpiled and put-up signboards marking the opening and closing dates. The company has a policy regarding the prohibition of burning waste, including in landfill areas.

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

### **Liquid, Solid and Air Waste**

Solid waste from the FFB processing process in the form of shells and fiber is reused by the company as a substitute for fossil fuels (Solar) for power generation in boilers, while for empty fruit bunches, it is used to substitute fertilizer applied to plantation land. Some of the solid waste in the form of shells is also sent or sold, while for empty vines, some are given to the surrounding community who have oil palm plantation lands to be used as fertilizer. Data on solid waste utilization is explained in more detail in indicator 7.9.1.

The company also utilizes POME by applying it to the Land Application for fertilizer substitution. The regulation and management of Land Application are explained in more detail in indicator 7.8.3. As for air waste, the company has not made a common use for air waste, namely the Biogas Plan. So far, the management related to air waste has only been limited to measuring air quality from waste-producing sources such as WWTP, Boilers and Gensets.

### **7.3.2**

Based on interviews with the Sungai Binti and Sawahan Estate Managers and the Central Workshop hazardous waste warehouse managers, it was found that they had an understanding of handling waste disposal, especially hazardous waste and domestic waste, as well as hazardous waste management in accordance with company procedures. The results of interviews with workers 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, all waste disposal facilities have also been provided by the company such as organic and non-organic waste bins, hazardous waste warehouses and landfills. The resource persons also understand very well how to separate the types of waste they produce and what types of waste should not be reused. Respondents' understanding of waste management is the result of routine and consistent socialization and training, as evidenced by the minutes that were held on April 13, 2022 to all SLE staff and employees.

Based on the results of field observations in the SLE and SWE residential areas, it is known that waste is still found in the SWE residential area in the form of mineral water packaging and plastic waste disposed of in irrigation canals, as well as used motor oil packaging in the SLE residential area. In addition, it was also found that there was reuse of used packaging in the form of jerry cans and sacks of fertilizer without any procedures for reusing used packaging. However, the company has actually managed household waste by preparing temporary trash cans which will then be disposed of at the TPA. Based on this, the company has the opportunity to increase the understanding of domestic waste management for employees and ensure that reuse activities are regulated in the relevant procedures. **(OFI)**

### **7.3.3**

The company does not do open burning to waste disposal, this can be proven from field visits to residential areas and landfills in TPE and SLE that no traces of burned waste were found. The results of interviews with employees also stated that they had never burned waste, because they were aware of the prohibition on burning activities and the sanctions they would receive if they burned them. Organic waste from housing and inorganic waste is disposed of in the bins provided, then transported every 2 - 3 times a week and disposed of in landfills and then buried when it is full. The results of field observations in employee housing areas also show many warnings to prohibit waste burning activities as well as the dangers that can arise from burning activities.

<b>Status: Comply</b>
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## **7.4**

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

### **7.4.1**

The Certification Unit has demonstrated and has Basic Guidelines related to Fertilization SOP procedures according to Good Agricultural Practices (GAP) for Fertilization which explains in managing soil fertility, including:

- No. OP/C4/03/09/02 about water management
- No. OP/C7/08/09/02 about legume cover crops
- No. OP/C14/11/12/03 about manuring

- No. OP/C15/09/14/03 about fertilizer sampling for quality control analysis
- No. OP/C16/11/12/03 about leaf and rachis sampling

Based on information from field observations with spraying, fertilizing and harvesting officers, it is known how the implementation and activities carried out by workers are in accordance with the SOP in implementation and monitored.

#### 7.4.2

The company has shown the Soil Analysis document of PT. Agro Bukit for the 2022 period which was carried out at the Integrated Laboratory of the University of Palangkaraya on January 6, 2022 as many as 18 samples, with analysis parameters pH H<sub>2</sub>O, Total N, K-dd, Ca-dd, Mg-dd, Na-dd, Pb, Cu, Zn, Cd, C-Org, KB, CEC and Texture (%).

The results of the soil analysis January 6, 2022 as a recommendation for fertilization for the period 2022-2023, as an example of the results include:

Sample Code	Parameters analyzed										Texture		
	pH H <sub>2</sub> O (1:2,5)	N Total	P-Bray	K-dd	Ca-dd	Mg-dd	Na-dd	C-Org %	KB %	KTK	Sand	Dust	Clay
E 34 0-20	4,28	0,28	60,28	0,06	0,39	0,27	0,06	2,40	2,88	27,15	24,64	34,22	41,14
E 34 0-20	4,24	0,26	58,47	0,05	0,24	0,15	0,08	1,66	1,94	26,32	18,01	39,04	42,95
E 34 0-20	4,12	0,25	47,87	0,03	0,20	0,11	0,06	1,41	1,41	28,18	13,56	33,54	52,90
E 34 0-20	4,01	0,27	50,11	0,03	0,16	0,13	0,05	1,21	1,21	30,27	11,32	39,22	39,45
E 34 0-20	4,23	0,23	42,79	0,03	0,22	0,20	0,04	1,61	1,61	30,78	10,66	38,92	50,43
E 34 0-20	4,28	0,24	32,35	0,02	0,24	0,24	0,04	1,60	1,60	29,02	9,32	36,39	54,28

The company has shown the results of leaf testing with a certificate of test results with certificate number: B1250/CPS/IX/2022 which was carried out on September 6, 2022 with a total sample of 1,046 sampling, conducted by the Central Plantation Services Laboratory of the University of Palangkaraya with analysis parameters N, P, K, Mg, Ca, B, S, Cu, Zn, Fe, S7.4.2

The results of leaf analysis on 6 September 2022 period as a fertilizer recommendation for the 2022-2023 period, as an example The results of soil analysis of PT. Agro Bukit include:

Lab Ref	No. Block	Leaf Nutrient Content %				
		N	P	Mg	Ca	B
22071250JT04971	ABCK/LC22/B23	2.49	0.157	0,24	0.69	13,6
22071250JT04972	ABCK/LC22/C13	2.47	0.158	0,30	0.63	11,8
22071250JT04973	ABCK/LC22/C14	2.45	0.160	0.25	0.56	11,8
22071250JT04974	ABCK/LC22/C15	2.49	0.146	0.28	0.57	13,2
22071250JT04975	ABCK/LC22/C16	2.43	0.139	0.27	0.56	11,2
22071250JT04976	ABCK/LC22/C17	2.45	0.143	0,29	0.59	11,0

Based on information from the results of document reviews and interviews with the management unit, records of leaf tissue analysis activities are carried out annually (last 6 September 2022) and soil sample analysis is available regularly every 3 years (last 6 January 2022) conducted by the Laboratory of the University of Palangkaraya to monitor and manage changes in soil fertility and plant health, the results of which are included in the Fertilization Plan Program for 2022-2023.

#### 7.4.3

The company manages liquid waste as land application and empty leaves as organic fertilizer listed in the POME and EFB application documents, including:

- EFB Utilization Application Activities at TPE Estate for Mature Crops Period January-September 2022 totaling 4,889.90 MT
- EFB Utilization Application Activities at SLE Estate for Mature Crops Period January-September 2022 totaling 6,564.70 MT
- POME/LA Utilization Application Activities at SBE Estate for Mature Crops Period January-September 2022 totaling 453 MT

The company has been able to demonstrate the reuse of palm oil waste in the documents for Realization of EFB and POME for Mature Plants (TM) for the 2022 period, as an example of an application at PT. Agro Bukit include:

EFB Utilization Application Activities at TPE Estate for Mature Crops Period January-September 2022 for example:

Month	Application EFB (MT)
January	1.260,40
February	1.099,20
March	802,60
April	513,00
May	61,20
June	130,60
July	91,70
August	384,40
September	546,60
<b>Total</b>	<b>4.889,70</b>

Application activities for the use of EFB in SLE Estate for Mature Crops for the period January-September 2022, for example:

Month	Application EFB (MT)
January	619,00
February	331,80
March	592,10
April	783,80
May	1.007,10
June	682,70
July	435,90
August	772,40
September	1.339,90
<b>Total</b>	<b>6.564,70</b>

Application activities for POME/LA Utilization at SBE Estate for Mature Crops for the January-September 2022 period, for example:  
Month Application

Month	Application LA Liquid (Mdys)
January	59,00
February	49,00
March	67,00
April	28,00
May	68,00
June	30,00
July	56,00
August	36,00
September	60,00
<b>Total</b>	<b>453,00</b>

Based on information from interviews with the management unit and the results of the document review that PT. Agro Bukit has

available a nutrient recycling strategy, which can include recycling empty fruit bunches, PKS liquid waste, palm oil residue, as well as optimizing non-organic fertilizers in a nutrient recycling strategy in the form of using empty bunches as organic fertilizer in oil palm plantations, but for POME/LA is only carried out by Sungai Binti Estate and other units do not use the POME nutrient recycling application. The application of EFB nutrient recycling is carried out by 4 Estates (SBE, SLE, TPE, SWE) every month in the period of 2022.

#### 7.4.4

The certification unit has a record of the fertilization plan and realization contained in the Recommendation Report and Fertilization Application document of PT. Agro Bukit for the period of 2021 (April 2021-March 2022) and the period of 2022 April - September 2022. There are some examples of Data on Fertilization Plans and Realizations in Mature Plant as follows.

The plan and realization of plant fertilization to produce PT. Agro Bukit Period April 2021 – March 2022 as follows:

Fertilizer	Plan (MT)	Realization (MT)
	April 2021 – March 2022	April 2021 – March 2022
Urea	2,285.92	2,279.71
REP	2,191.09	2,189.00
MOP	5,454.72	5,521.20
BORATE	174.06	95.00
Dolomite	2,940.90	2,952.60

Fertilization plan for the period April 2022 – March 2023 and the realization of fertilization for the period April 2022 – March 2023 PT. Agro Bukit as follows:

Fertilizer	Plan (MT)	Realization (MT)
	Period April 2022- March 2023	Period April 2022 – March 2023
Urea	2,678.80	761.55
REP	2,231.65	-
MOP	5,226.12	1,646.75
BORATE	176.94	22.43
Dolomite	2,542.67	2,952.60
CuSO4	31.09	4.48

Based on information from the results of document verification and interviews with the management unit, information was obtained that the realization of fertilization including Urea, Dolomite and MOP fertilizers and others in the 2021 period was in accordance with the plan. However, for the period of 2022 (January – September 2022) it is known that fertilization has not been in accordance with the recommendations due to high rainfall, causing delays in application of fertilization at PT. Agro Bukit.

**Status: Comply**

## 7.5

### Practices minimize and control erosion and degradation of soils.

#### 7.5.1, 7.5.2, and 7.5.3

The certification unit has a peat area planted with oil palm plantations covering an area of 5,051.36 Ha according to the data that has been filled in the RSPO Metric Template Form 2022. The company has shown the PT Agro Bukit Topographic Map document with a scale of 1:55,000, with a Topographic survey source from August -November 2020, which contains information on contours, natural ditches, river riparian, water flow directions, roads, organic areas (peat) and elevation. The company owns a peat area planted with oil palm plantations covering an area of 5,051.36 Ha according to the data that has been filled in the RSPO Metric Template Form 2022. The company has topographic maps and soil maps from the 2007 land survey that identify marginal and fragile soils, including steep terrain and peat soils.

Based on information from the results of the study of topographic maps and soil maps from the 2007 land survey, and field observations during the audit at PT. Agro Bukit can be concluded that the slope of the plantation land ranges from 0° - 6° (flat to wavy). Thus, the company does not have a steep land management strategy. Field observations found no plantings in areas with steep slopes. The results of field observations, interviews, and document review revealed that there were no new plantings at PT Agro Bukit.

**Status: Comply**

### 7.6

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

#### 7.6.1, 7.6.2, and 7.6.3

The Certification Unit has presented documents including, among others, maps of long-term land suitability for oil palm cultivation, land maps or land surveys that identify marginal and fragile soils, including land with steep slopes, in planning and operation, several examples of land suitability documents for oil palm cultivation Antara other:

- Topographic map of PT Agro Bukit with a scale of 1:55,000, sourced from a Topography survey in August-November 2020, which contains information on contours, natural ditches, riparian rivers, water flow directions, roads, organic areas (peat) and elevation
- Detailed soil map soil survey scale 1:32,000 which was conducted from September 2006 to April 2007 by Chuah Joo Hor of Param Agricultural Soil Survey, assisted by the Department of Agronomy of PT Agro Bukit. The soil survey report informs the types of marginal and/or fragile soils, along with their area. Soil properties that are limiting factors in oil palm cultivation include soils with very sandy and spodic textures, deep peat and low fertility.
- PT Agro Bukit's peat nature map with a scale of 1:50,000 from the Geodatabase of the Department of GIS and GPS. The map informs that there is peat soil with a depth of 0.5-1.5 m covering an area of 457 ha; 1.5-3.0 m2 with an area of 913 ha; 3.0-5.0 m2 covering 1,906 ha and >5.0 m2 covering 3,570 ha. Then, it was also informed that the soil with a sandy texture, namely Spodosol covering an area of 663.89 ha and loamy sandy 513.03 ha.

Based on the results of the map study shown, it can be concluded that marginal soils are soils with a sandy texture (*Spodosol*) with a spodic layer (hardpan). Meanwhile, the fragile soil in the company's operational area is peat soil with a depth of >3 m, which is dominant in the east of the PT Agro Bukit operational area.

**Status: Comply**

### 7.7

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

#### 7.7.1

Based on information from the results of document review, field visits and interviews with the management unit, it was found that until the ASA 1.2 audit was carried out, that PT Agro Bukit had planted oil palm from 2005 – 2012 and didn't carry out new planting activities after January 1, 2013

#### 7.7.2

Based on information from the results of the document review and interviews with the Management Unit that the company has reported the peat areas within the managed areas are inventoried, documented, and reported to the RSPO Secretariat by showing the email communication between the Conservation PIC and the RSPO, regarding the peat inventory chronology of PT. Agro Bukit on September 14, 2021. The company owns a peat area planted with oil palm plantations covering an area of 5,051.36 Ha according to the data that has been filled in the RSPO Metric Template Form 2022.

#### 7.7.3.

The Certification Unit has made efforts to manage peat subsidence with water management, namely drainage systems, stop bunds and sluice gates. The water level of the canal was monitored with a water level and groundwater with a piezometer, then peat subsidence was monitored with a subsidence stake. The company has one subsidence pole in every 240 ha of peatland planted with oil palm and there is a quarterly monitoring record of peat subsidence available.

Based on information from the results of document review and observation that the company has managed peat areas well, including:

- **Sungai Binti Estate**

- Subsidence stakes, Block E 39. The company has carried out monitoring of peat subsidence by installing subsidence stakes.



- Piezometer, Block F27, the Company has carried out monitoring of ground water level monitoring by installing a piezometer.
- Water Level, Block C 42. The company has monitored the water level of the canal by installing a Water Level.
- **Sungai Lenggana Estate**
  - Subsidence stake, Block G26. the company has carried out monitoring of peat subsidence by installing subsidence stakes.
  - Piezometer, Block I31, the company has carried out monitoring of ground water level monitoring by installing a piezometer.
  - Water Level, Block M23. the company has observed monitoring the water level of the canal by installing a water level.
- **Tanah Putih Estate**
  - Subsidence stake, Block D08, the company has carried out monitoring of peat subsidence by installing a subsidence stake.
  - Piezometer, Block E11, the company has carried out monitoring of ground water level monitoring by installing a piezometer.
  - Water Level, Block F13, the company has monitored the water level of the canal by installing a Water Level.
- **Sawah Estate**
  - Subsidence stake, Block 011, the company has carried out monitoring of peat subsidence by installing a subsidence stake.
  - Piezometer, Block K19, the company has carried out monitoring of ground water level monitoring by installing a piezometer.
  - Water Level, Block N15, the company has monitored the water level of the canal by installing a Water Level.

### 7.7.4

Company has a documented and implemented water management program in place, Maps of the water management system, Groundwater Levels (including canals, outlets and water control structures and monitoring points, flow direction) available, Historical records of floods including affected areas, duration and elevation maximum water during flooding, is available and maintained.

Based on information from the results of the document review on Monitoring Summary Water Level PT. Agro Bukit for the 2022 period (January-September 2022) that the company has subsidence benchmarks, piezometers, water levels in good condition and has been monitoring measurements every month. The company already has piezometers, subsidence stakes and water level with details as follows: 20 in Sawahan Estate, 15 in Sungai Lenggana Estate, 5 in Tanah Putih Estate and 7 in Sungai Binti Estate. 3-4 weeks in the M26 block on the water level gauge showed a measurement of 9 cm below the average planting level, and the piezometer showed a measurement of 19 cm below the average planting level.

### 7.7.5

Based on information from the results of the document review and interviews with the management unit that the company has no replanting program or activity in all Estate units of PT. Agro Bukit. Due to the cultivation of oil palm in the company, planting was carried out in the year of oil palm planting between 2005 – 2008, so that a Drainability assessment/study had not been carried out.

### 7.7.6

The company has carried out peatland management in accordance with the RSPO Guidelines for Best Management Practices (PPT) for Oil Palm Cultivation, some examples of peatland management include:

- Documentation of the height of the face. The water level monitoring post is placed in the collection channel/main channel.
- At least 1 (one) piezometer per 120 ha, installed in the planted area.
- The water level is monitored weekly in the sewer or in the field. To ensure the water level is maintained: an average of 60cm (between 50-70 cm) in the drain; or 50cm average (between 40-60 cm) in the field
- The water level (outside the water control structure) at the relevant exit is monitored.
- For areas affected by tidal flow, records of daily tidal fluctuations at outlet points are available at 4 Estate.
- Records of all water level monitoring are available at 4 Estate.
- Daily local rainfall data available from the certification unit in 4 Estate.
- Water monitoring information is available to be used for active management of water level in plantations in 4 estates.

The certification unit has demonstrated good management as indicated by monthly Ground water level monitoring documents for the period 2021-2022 and the establishment of peat soil subsidies and making stop offs to keep water in the block, as well as constructing a water gate.

### 7.7.7

From the information on the results of the document study, field observations and interviews with the management, it is known that the entire land area of PT. Agro Bukit has been planted with oil palm plantations, and in particular the area of all peat areas that are not planted and reserved within managed areas are protected as peatland conservation areas. The peatlands managed by the

company are in compliance with the RSPO Best Management Practices (relevant audit guidelines) for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists on Peatland.

**Status: Comply**

### 7.8

#### Practices maintain the quality and availability of surface and ground water

##### 7.8.1

Based on the 2006 ANDAL, the 2021 ANDAL and the results of the 2009 HCV identification, as well as a map of river flows and water sources, it can be seen that there are several water sources in the operational area of PT Agro Bukit, namely the Lenggana River, Anak Lenggana River, and the Binti River. Based on the document, it is also known that the water source management plan is to test the quality of surface water every 6 months, monitoring wells every 6 months and drill wells every 1 year. All tests were carried out by a KAN accredited laboratory (LP-195-IDN). Related to this, the company shows the results of testing the quality of surface water for the first semester of 2022 carried out on May 23, 2022. The company conducts surface water testing with all indicators according to the matrix request in the 2006 and 2021 AMDAL which was carried out at 4 sample points. Based on the analysis of the test results for all of these locations, it shows that there are several test results parameters that are not in accordance with the class 2 quality standard according to Government Regulation Number 22 of 2021, namely the COD and DO parameters. The company can explain the cause of the high-test results for these parameters due to the characteristics of swamp and peat rivers as well as high rainfall conditions for Semester 1 of 2022.

The unit of certification also does not limit access to clean water, and all workers also have access to adequate clean water. Based on the results of field observations in the SWE and SLE housing areas 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 living in factory housing. the water comes from reservoirs that have been treated in WTP. Drinking water testing is also carried out by the company to see the quality of drinking water taken from drilled wells carried out by a KAN accredited laboratory (LP-195-IDN) on May 23, 2022. The results of testing the quality of drinking water also show that all parameters of the test results are still in accordance with the standards. The applicable quality is the Regulation of the Minister of Health Number 492 of 2010. Meanwhile, the results of the monitoring well test will be explained in indicator 7.8.3.

The company also has a water quality management procedure described in the SOP.EHS.MWQ-02 procedure which was legalized on June 1, 2019. Those with river and tributary status follow the rules, namely the width of the river border is 100 meters and the width of the tributary is 50 meters from the river bank. Based on the results of document verification and field observations to several sampling locations, it shows that the company has carried out activities in an effort to improve water quality, including:

- Conduct socialization to all employees and the surrounding community not to use water for consumption activities.
- Create a program to improve water quality gradually with the provisions of the applicable laws and regulations.
- Report the results of the examination in accordance with the provisions of the applicable laws and regulations.
- Management of riverbanks and water sources in the form of reservoirs.
- Waste water management using WWTP and its utilization in licensed application areas as well as monitoring the quality of wastewater and monitoring wells.
- Monitoring the use of water for oil palm processing and evaluating its use.
- Planting of local forestry plant species on riverbanks in SLE and SWE.

##### 7.8.2

The company has water and wetland protection which is contained in the Sustainability Policy document Number GAHL.SP.SU.01, revision 01 which was ratified on 25 June 2020 and the Water Quality Monitoring Procedure described in the SOP.EHS.MWQ-02 procedure which was ratified on 1 June 2019. The SOP explains several things related to the management of river borders and other water sources, such as creating a chemical-free area on river borders and reservoirs which are marked by applying red palm oil markers or paint by determining the width of the river border area. 100 meters wide, tributaries 50 meters wide and 10 meters wide for artificial reservoirs.

In addition, the company also explained the efforts to manage river borders and other water sources, such as periodically monitoring the condition of river borders from disturbances and pollution and fires every month, testing surface water quality standards to ensure river water quality is still within normal limits. In addition, the company also conducts socialization to employees and the surrounding community in conservation efforts which can be proven based on the minutes of socialization to workers on 8 - 13 April 2022 and to

the community on 17 May 2022. Results of interviews with spraying and fertilizing workers in SLE, SWE and TPE also stated that they were aware of the rules regarding chemical application limits, prohibition of washing chemically contaminated goods in rivers and other activities that have a negative impact on water sources.

The company has also planted woody plants on riverbanks, since 2015 it is known that plantings have been carried out consisting of Angsana, Mahogany, Acacia, Pulai, Belangiran, Pantung, Jelutung and Vertifer Grass species. Based on the results of the field visit to the HCV location which is the Anak Lenggana River border area block N22, it shows that several activities have been carried out by the company as a form of protection for the river border area, such as:

- Placing warnings, HCV areas, no hunting, logging and land burning.
- Do not apply chemicals in HCV areas.
- Create a barrier between the HCV area and other areas in the form of a 1-meter-wide trench.
- Mark the HCV area with a red peg.
- The company has also disseminated the prohibition of spraying on the edge of water bodies to workers.

### **7.8.3**

The unit of certification has facilities for the management of POME produced from palm oil processing with a capacity of 90-ton FFB/hour using WWTP. POME that has been managed at WWTP will then be used as a fertilizer substitution in Land Application (LA). Before being distributed to the Land Application, all POME is entered 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. Waste treatment facilities owned are as many as 10 ponds consisting of 2 Cooling Ponds, 4 anaerobic ponds, 4 aerobic ponds and 1 holding pond where are the outlets in the holding pond.

The company also has a Liquid Waste Utilization Permit for Land Application (LA) based on the Decree of the Kotawaringin Timur Regency DPMPSTP Number 54/DPMPSTP-PT/LA/X/2019 concerning the Permit for Utilization of Palm Oil Industrial Wastewater on Soil at the PT Agro Bukit Palm Oil Plantation. which was legalized on October 9, 2019 with a validity period of 5 years and the permitted application area is 600 hectares. In the permit there is also an obligation to monitor groundwater quality using monitoring wells located in 3 locations, namely block E30, block E34, and residential areas on the Sungai Binti Estate. The company also has an obligation to monitor potential environmental impacts at any time and ensure the quality of POME that will be applied to the land is in accordance with applicable quality standards.

To determine the feasibility of POME quality, the company conducts monthly testing using quality standards that refer to the Ministry of Environment Decree No. 28 of 2003 concerning Technical Guidelines for Assessment of Wastewater Utilization in Palm Oil Plantations. The company can show evidence regarding the results of POME quality measurement in the form of a document of the results of tests carried out by a laboratory accredited by KAN (LP-195-IDN). The test was carried out in 2 locations, namely pond 4 and pond 8, based on the results of the analysis of the test results for the period January – September 2022, indicating that the liquid waste generated from FFB management activities is feasible to be applied to the Land Application. The company can also show the results of testing on monitoring wells for the period of semester 1 of 2022 carried out by a KAN accredited laboratory (LP-195-IDN) on 23 May 2022. namely Minister of Health Regulation No. 32 of 2017. In addition to testing by external parties, the company also conducts daily waste quality testing which is carried out at the company's laboratory located in the factory to ensure the quality of daily waste for feasibility of land application.

### **7.8.4**

The company does not yet have a Surface Water Utilization Permit, but has carried out the process of obtaining the permit as evidenced by the document of Certificate Number 208/KET/BWS24/2022 dated October 1, 2022 issued by the Ministry of PUPR which states that the company has carried out the process of processing technical recommendations for concession permits. water resources since August 30, 2021 and has fulfilled all the required documents, but the permit has not been issued due to constraints from the ministry. This has become OFI in indicator 2.1.1.

However, the company can show documents recording daily water use, as well as the results of the recapitulation of water use for palm oil processing units every month, for example for the period October 2021 – September 2022. Based on surface water utilization data, if the average use of water for FFB processing is taken which is 32,303 m<sup>3</sup>/month or equivalent to 0.91 m<sup>3</sup>/ton FFB. However, if the overall water use is calculated, the total water use is 40,125 m<sup>3</sup>/month. The company also sets a water usage budget of 50,877 m<sup>3</sup>/month, this shows that the company is still using water in accordance with the specified budget.

The company can also show proof of payment of water levies to the Regional Revenue Service Technical Implementation Unit (UPTPPD) for the period from January to December 2021 with the payment period being made annually. The last example of proof of payment of water levies is based on proof of payment made on February 8, 2022 for a total water use of 499,268 m<sup>3</sup>.

The results of field visits to the Water Treatment Plan (WTP), Water Intake and Reservoir also show that the flowmeter used is still functioning properly and the officer responsible for the WTP is 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.

<b>Status: Comply</b>
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## 7.9

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

#### 7.9.1

The Certification Unit has made efforts to improve the efficiency of the use of fossil fuels and optimize renewable energy, these efforts are also monitored and documented in the form of a document for Calculation of Biofuel Utilization Efficiency in the Sungai Binti POM for the period 2021 – 2022. The biofuel in question is solid waste in the form of shells and fiber, which is used to substitute fossil fuels (diesel) as a producer of electrical energy using a boiler. The recapitulation of solid waste utilization for the period October 2021 – September 2022 shows that from 426,146 Tons of FFB processed, it can produce biofuel in the form of 23,106 Tons of shells and 44,976 Tons of fiber, most of which are used for the combustion process in boilers or equivalent to 15.35% of the total FFB processed.

Based on the data analysis on the use of diesel fuel, the estimated information needed to generate electricity in the factory, office and residential areas is obtained, which is 2,454,218 liters/year or 5.75 liters/ton of FFB. However, due to the efficient use of diesel fuel which is substituted with biofuel, it can reduce the use of diesel to only 121,518 liters/year or equivalent to 0.29 liters/ton of FFB. This shows that the use of biofuels can reduce the use of diesel by 95% for the years 2021-2022.

The results of interviews with the company stated that this efficiency is very beneficial because it can reduce diesel consumption. Currently, the use of diesel is only needed to turn on the turbine for initial power generation, use of generators and transportation. Energy efficiency is also applied to all operational activities of the company by minimizing the use of fuel by contract workers, including all machinery and transportation operations. The overall use of diesel for the Estate area has also decreased which can be shown from the data on the use of diesel for the period of Semester 2 of 2021, which is 84,490 liters, while for the use of diesel for the period of Semester 1 of 2022, which is 35,028 liters or there is a decrease in the use of diesel by 51,462 liters. In addition to the use of biofuels, the company is also developing a biogas plan that will be used as methane capture for power generation so that it can significantly reduce the use of diesel fuel in the future.

<b>Status: Comply</b>
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## 7.10

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

#### 7.10.1

The Certification Unit has carried out a GHG inventory contained in the 2021 Annual Report and Greenhouse Gas Mitigation Strategy document, based on document analysis it can be concluded that the company has identified the source of GHG produced by the Sungai Binti POM unit and its suppliers. Identification of significant sources of GHG emissions are identified and mitigation plans have been developed by the company covering mills and plantations. Significant GHG emissions are land use change, POME processing, use of fertilizers and pesticides, and use of fossil fuels for operations and transportation. The mitigation plans include efficient use of fertilizers, integrating best management practices and technological innovations, composting practices to reduce the use of chemical fertilizers, planting techniques without burning, integrated pest management and the use of shells and fiber for diesel substitution. The company has also reported the results of the GHG calculation to the public which was submitted to the RSPO GHG website.

The company also uses POME with test results from the monitoring period January – September 2022 which show that all wastewater testing parameters have met the applicable quality standards. Based on a review of documents such as monitoring of pesticide use, monitoring of diesel fuel, identification of HCVs etc. it was found that accurate data has been entered into the RSPO GHG Calculator version 4.0. The summary of GHG emissions for the period January – December 2021 is as follows:

General information					
Association	No. of Estates/Plantations		FFB Processed (t)	Planted Area (ha)	
Own Plantation	4		284,234.63	10,301.50	
Group Plantation	0		0	0	
3rd Party	2		101,932.61	0	
Total	6.00		386,167.24	10,301.50	
Summary Emissions					
Description	Value	Unit	Description	Value	Unit
CPO	5.19	tCOe2/tProduct	Oil palm planted on mineral soil	5,250.02	Ha
PK	5.19	tCOe2/tProduct	Oil palm planted area on peat	5,051.48	Ha
PKO	0.00	tCOe2/tProduct	Total oil palm planted area	10,301.50	Ha
PKE	0.00	tCOe2/tProduct	Conservation area (Forested)	215.78	Ha
OER	21.49	%	Conservation area (non-Forested)	224.94	Ha
KER	5.09	%	FFB Production per hectarage	37.49	t/ha
Mill Emissions and Credits & Emissions from Palm Kernel Crusher					
Mill Emissions and Credits			Emissions from Palm Kernel Crusher		
Emission Source and Credits		tCO2e	tCO2e/t FFB	Emission Source	tCO2e
POME		75,695.32	0.20	PK from own mill	0.00
Fuel Consumption		6,862.61	0.02	PK from other sources	0.00
Grid Electricity Utilization		0.00	0.00	Fuel Consumption	0.00
Export of Excess Electricity to Housing & Grid		0.00	0.00	Total Crusher Emissions	0.00
Sale of PKS		0.00	0.00		
Sale of EFB		0.00	0.00		
Total		82,557.93	0.21		
Estate / Plantation Field Emissions and Sinks					
Description	Emission (tCO2e)			TOTAL	
	Own	Group	3rd Party		
Emission Source					
Land Conversion	179,449.35	0.00	0.00	179,449.35	
CO2 Emissions from Fertilizer	9,485.23	0.00	0.00	9,485.23	
N2O Emissions from Peat	39,604.24	0.00	0.00	39,604.24	
N2O Emissions from Fertilizer	9,671.83	0.00	0.00	9,671.83	
Fuel Consumption	2,923.99	0.00	0.00	2,923.99	
Peat Oxidation	288,867.31	0.00	0.00	288,867.31	
Sinks					
Crop Sequestration	-102,785.38	0.00	0.00	-102,785.38	
Sequestration in Conservation Area	-4,315.40	0.00	0.00	-4,315.40	
Total	422,901.16	0.00	27,521.80	450,422.97	
FFB Supplier					
Supplier Name	FFB Production by Estate/Plantation (t)	FFB Supplied by Estate/Plantation (t)	Percentage of FFB supplied by Estate/Plantation (%)		
Sungai Binti Estate	69,854.27	69,854.27	100.00		
Sungai Lenggana Estate	53,005.82	53,005.82	100.00		
Tanah Putih Estate	71,949.87	71,949.87	100.00		
Sawahan Estate	89,424.67	89,424.67	100.00		
Plasma ABCK	32,417.14	32,417.14	100.00		
Outgrower	69,515.47	69,515.47	100.00		



**Palm Oli Mill Effluent Treatment**

Description	Unit	Value
POME Produced	t/yr	259,697.47
Diverted to Compost	%	0
Diverted to anaerobic digestion	%	100
POME to anaerobic pond	%	100
POME to methane capture (flaring)	%	0
POME to methane capture (electricity generation)	%	0
COD value before anaerobic digestion	mg/l	0
COD value after anaerobic digestion	mg/l	0
COD removed during digestion	tCOD/tPOME	0.00
POME Produce	t/yr	259,697.47
CH <sub>4</sub> (Total)	t/yr	3,402.04
Applied N in POME	t/yr	116.86
Total N <sub>2</sub> O emission from POME	tCO <sub>2</sub> e/yr	0.78

*\*POME is processed only in WWTP*

Based on the results of the above data analysis, it can be seen that the emission value from CPO and PK production is quite high, namely 5.19 tCO<sub>2</sub>e/tProduct. This is because there is a peatland area of 5,051.48 Ha in the production area which has a fairly high Peat Oxidation value. In addition, the company has not utilized POME using Methane Capture so that the emissions generated from POME processing at WWTP are still quite high. However, when compared to the emission values of the previous period, there was a decrease in CPO and PK emissions from 5.31 tCO<sub>2</sub>e/tProduct to 5.19 tCO<sub>2</sub>e/tProduct. The results of interviews with management stated that the emission reduction was due to changes in data on the area of HCV and Peatlands.

**7.10.2**

The Certification Unit did not carry out new developments after 2014, but the company continues to manage GHG by conducting an inventory of emission sources. They can show identification documents of activities that generate emissions for the period 2021 for Mills and Plantations. This is done to estimate the carbon stock in the management area along with potential sources of emissions that can occur directly as a result of the management, and a plan to minimize these emissions is 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 and fiber as a substitute for diesel, performing maintenance on operational equipment on a regular basis, and utilizing POME in Land Applications. Companies can show records of GHG mitigation for Estate and Mill units, for example the use of fertilizers according to the dose, routine maintenance of operational vehicles, socialization of the prohibition of burning waste, implementation of efficient use of electricity and integrated pest control to minimize the use of pesticides.

**7.10.3**

The certification unit has identified the source of pollution and the mitigation plan contained in the Sustainability Policy document Number GAHL.SP.SU.01, revision 01 which was ratified on June 25, 2020. The company has also carried out management and monitoring related to the results of the identification and mitigation plan which is proven through the Ambient Air and Emissions Monitoring Result Report document, semester 2 of 2021 and has reported it to the Kotawaringin Timur Regency Environmental Service on January 28, 2022.

Based on the verification of the document, it shows that in the management of air pollution, the certification unit has tested air emissions on boilers and generators as well as ambient air. The test was carried out by a KAN accredited laboratory (LP-195-IDN) on March 15, 2022. 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 PermenLH Number 07 of 2007 for Boilers, PermenLH Number 13 of 2009 for Genset and PPRI No. 22 of 2021 for ambient air.

In addition, the company has also carried out management for interference from immovable sources. The test was carried out by a KAN accredited laboratory (LP-195-IDN) on March 15, 2022. The tests carried out by the company included testing for odor, vibration, and noise in the work area and housing. Based on the results of document verification, it shows that all test results are in accordance



with the quality standards set for each applicable statutory regulation, namely KepmenLH Number 48 of 1996 for noise, KepmenLH Number 49 of 1996 for vibration, and KepmenLH Number 50 of 1996 for odors.

However, for the results of noise measurements, based on Permenakertrans Number 5 of 2018 for several FFB processing areas in the Mill and generator room area, it shows that they are above the required quality standard values. Under these conditions, to reduce the potential for harm to hearing, the company has prepared several control actions plans to reduce the impact on the health factors of operators working in the workplace. Efforts that have been made by the company include:

- Replacement of components/redesign of machines so that noise can be reduced, program maintenance of tools/machines on a regular basis to maintain them
- 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 in the Factory and socializing it to all related employees
- Conduct periodic socialization and training of SOPs to related operators.
- Installation of "Noise Zone" warning boards and mandatory use of PPE.
- Inspection and evaluation of the health of the workforce and the routine work environment at stations with a potential level of noise hazard.
- Examination of the use of PPE by safety officers related to the discipline of using PPE.
- Provide PPE in the form of earplugs and earmuffs and conduct audiometric health checks for factory employees.

**Status: Comply**

#### **7.11**

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

##### **7.11.1**

The Sungai Binti POM certification unit can show the Fire and Spill Emergency Response SOP Number SOP.EHS.ERP-03 revision 1 dated 11 July 2018. The scope of the SOP includes planning, prevention, mitigation, post-fire management and reporting and coordination of firefighting and land preparation work, where the procedure explains that land clearing is done by mechanical means and Zero Burning. The land clearing procedure is carried out by not burning but doing it mechanically.

The company also has SOP for New Land Clearing Number OP/C2/03/09/02 dated Revision 1 dated March 9, 2019 which shows the work process on land preparation by not burning in land clearing activities. In addition, Goodhope as the parent of PT Agro Bukit also has a company regulation regarding the Sustainability Policy Number GAHL.SP.SUS.01 which explains that the company will implement Zero Burning in all plantation development activities including preparation of new plantings, replanting, or other development activities.

Based on the results of field observations, no replanting area was found, the last planting year according to the area statement data showed that the last planting was carried out in 2012. Based on interviews with management, it was stated that all land clearing activities used mechanical. Based on an interview with the Environment Agency, it was also stated that the company has shown a commitment not to burn for land clearing through fire simulation activities involving various stakeholders and socialization to the community as evidenced by the minutes of the socialization activity conducted on January 18, 2022, which was attended by 46 participants.

##### **7.11.2**

The company already has a Fire and Spill Emergency Response SOP Number SOP.EHS.ERP-03 revision 1 dated 11 July 2018. Based on the review of the document, it is known that the fire control techniques owned by the company have referred to the prevailing laws and regulations in Indonesia, including: Another example is Law Number 18 of 2004, Law Number 32 of 2009, Minister of Environment and Forestry Regulation Number 32 of 2016 and Minister of Agriculture Number 5 of 2018. The fire control and prevention program has been included in the Monitoring Program for Fire Fighting Facilities and Infrastructure for the 2022 period, for example, monitoring APAR, monitoring firefighting equipment and fire simulation. The company has also managed, monitored, prevented and controlled land and forest fires, including the following:

- Establishment of a firefighting team equipped with the necessary equipment.

- Conducting firefighting exercises and increasing the frequency of fire patrols by involving the surrounding community, for example by conducting emergency and fire simulations on April 14, 2022 which was attended by 60 participants and special fire training for Fire Drill on June 15, 2022 which was attended by 21 participants.
- Monitoring and socialization of forest and land fire prevention conducted on September 17, 2021, which was attended by 17 participants from Natai Baru Village, Bagendang Village, Rongkang Village, and Kampung Barat Village.
- Provide firefighting equipment that refers to the Regulation of the Minister of Agriculture Number 05 of 2018.
- Routinely check firefighting equipment such as monthly Fire Extinguisher monitoring with inspection results at the location of fire extinguisher installation with powder, foam and CO2 types in Estates and factories in a ready-to-use condition.

The company can also show a list of facilities and infrastructure owned by referring to the standardization of equipment in Ministry of Agriculture 05 of 2018. The results of field observations at the Sawahan Estate and Tanah Putih Estate Firefighting Warehouses show that all facilities and infrastructure are in good condition and well maintained, firefighting simulation activities also runs well and the tools used can function optimally. The company already has complete facilities and infrastructure as shown in the Fire Extinguishing Equipment List document with the latest update in August 2022. Based on field observations and at several fire tower locations, it also shows that the company is managing these facilities and infrastructure well. The results of interviews with several employees also stated that the company had made efforts to prevent and control fires through the installation of signboards, socialization, and fire simulations by the firefighting team for each unit and as a whole involving relevant stakeholders and the surrounding community.

In addition, the company can also show several documents related to fire management that have been carried out, including:

- Map of fire prone areas including locations of fire towers, reservoirs and storage facilities and infrastructure.
- Prepare a Fire Monitoring Report document for the period of Quarter 2, 2022 which is reported to the Plantation Service and the Riau Province Environment Service on July 24, 2022.
- Records of patrolling fire-prone areas for the period January – June 2022 with no fire results. The results of the examination of the document revealed that there have been no fire incidents in the company's operational areas since the last year.
- The company also reports management related to fires in the RKL-RPL document every semester.
- As an effort to prevent fires, the company can also show reports related to the installation of fire warnings, prohibitions on burning garbage and so on.

The results of the interview with the Plantation Office of Kotawaringin Timur Regency also stated that the firefighting equipment owned by the company was sufficient for fire control. The company has a fire control system which is described in the Fire Management Report document which is reported every month. The provision of fire prevention infrastructure has referred to the Ministry of Agriculture Number 05 of 2018.

### 7.11.3

PT. Agro Bukit also has a firefighting team structure which is part of the Emergency Management Team which is prepared as a responsive team to always be on standby in any condition to handle fire emergency conditions, especially in the company unit area and help the surrounding community. The latest Fire Fighting Team structure is based on the Renewal of the Ratification Decree which was approved on June 30, 2022 by the Director of Operations with a total of 60 members.

Based on document review, interviews with management units and workers accompanied by simulations of fire extinguishers, it can be seen that the company has human resources capable of preventing and dealing with fires. This is also supported by adequate equipment and routine activities in conducting emergency response team simulations. Emergency Response Team members are employees selected by the company and trained to participate in simulations who are expected to be able to handle emergency conditions, and master the role and security measures. The company has carried out a simulation of an emergency and fire on June 15, 2022. For the period 2022 – 2023, the company can show a fire management budget for the maintenance of fire prevention facilities and infrastructure and part of it is allocated for the management of an external emergency response team consisting of the community around the company originating from 4 villages with membership in each village of 10 -15 people. The group is managed independently by the Village and in collaboration with the company in order to be synergistic and responsive in fire management activities.

In fire management, the company monitors hotspots from the company's area using fire towers and analyzes hotspots via the internet so that they can cover the surrounding villages. The company also routinely provides assistance and socialization in the prohibition

of land burning activities to minimize the risk of greater fires that are carried out in conjunction with the management of SIA and HCV. Several approaches taken by the company in anticipating fire incidents include:

- Initial monitoring is an activity carried out to obtain initial data in the form of hotspot data.
- Delivering information to all levels of management regarding the level of existing hazard.
- Information is conveyed through management meetings and memos from management.
- In the field, the status of the hazard level is informed through the Fire Danger Rating Information Board and the status is always updated following data updates from the BMKG or from the Forest and Land Fire Fighting Task Force.
- Build 9 units of Fire Monitoring Tower which are positioned in strategic areas and allow to monitor all operational areas of the company.

**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

Based on management information and a review of the hectare statement, it was found that there were no additional plantings or expansion of plantation operational areas after November 15, 2018. However, the company cleared land after November 2005 without prior HCV assessment so remediation and compensation procedures apply. The company conducted an HCV assessment for the entire PT Agro Bukit management area based on a Location Permit with a total of **13,930 Ha** carried out in 2009. The total area is different from the scope of certification because some areas cannot be included for reasons of compliance with legality.

The company conducted a LUCA study in 2014 - 2015 with a study area of **15,543.25 Ha**. Based on the results of the LUCA document study, it is known that the company cleared land in 2005-2009 with a total area of **12,586.15 Ha** for Raw Liability and **26.6 Ha** for Final Conservation Liability (FCL). The LUCA study has gone through a review process with PASS status. However, the document resulting from the 2015 LUCA study is no longer valid when referring to the RSPO response email on 4 October 2017 which states the following:

- The Biodiversity and High Conservation Working Group (BHCWG) has agreed to remove the endorsement of the LUCA review report from the RaCP. However, the report will be made available to the compensation panel, should it be requested. Therefore, the LUCA review report for ABCK is accepted. Based on the report:
- The Final Conservation Liability (FCL) is 0 Ha.
- There seems to be a clearance of riparian areas in 2006-2007, based on the report, the total area requiring remediation is **152.11 Ha**.

Based on the results of the verification related to this, the company has made follow-up efforts for remediation management with evidence of the communication flow via email between the company and the RSPO since October 2020 until the last one was carried out on June 11, 2021 regarding the sending of clarification documents and revisions to the remediation plan covering an area of **152,11 Ha** to the RSPO secretariat. However, until the ASA 1.1 audit was conducted, the company had not received a response from the RSPO. Based on this, the company has made efforts to fulfill its obligation to carry out remediation, but until the surveillance audit 1.2, the company has not received a response from the RSPO so that the remediation action cannot be carried out in full because it is still waiting for RSPO approval.

#### 7.12.2

The first land clearing was carried out in 2005. Based on the verification of land clearing data there is no indication of new land clearing after 15 November 2018, therefore the company has no obligation to conduct a High Carbon Stock (HCS) study. The area to be managed has been assessed for HCV in August – September 2009. The HCV assessment activity was carried out by the Faculty of Forestry of IPB using the 2003 HCV toolkit. The HCV identification assessment was carried out for the entire company management area covering an area of **13,930 Ha**. Based on the results of the study, the company conducted a public consultation on HCV on October 21, 2009 at Pondok Family Hotel Sampit which was attended by 64 people consisting of the police, company representatives, representatives of the surrounding village community, sub-district representatives, mass media, education consultants, representatives of surrounding companies. PT Agro Bukit, and NGOs (BOSF and WWF). The following are data from the 2009 HCV assessment, among others:

HCV area	Location	HCV Type	Area (ha)
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SS. Lenggana	Sawah Estate	1.1; 1.3; 2.3; 3; 4.1	197.83
SS Anak Lenggana	Sungai Lenggana Estate	1.1; 1.2; 1.3; 2.3; 4.1	202.72
SS Binti	Sungai Binti Estate	1.1; 1.3; 1.4; 2.3; 3; 4.1	56.58
Kerangas Forest	Tanah Putih Estate	1.3; 2.3; 3; 4.1	142.36
<b>Total</b>			<b>599.48</b>

The entire HCV area is divided into two types of management, including conservation areas outside the scope of certification with a total area of **158.76 hectares** located in the company's plasma plantations and conservation areas included in the scope of certification with a total area of **440.72 hectares** with the following details:

HCV area	Location	HCV Type	Area (ha)
SS. Lenggana	Sawah Estate	1.1; 1.3; 2.3; 3; 4.1	197.83
SS Anak Lenggana	Sungai Lenggana Estate	1.1; 1.2; 1.3; 2.3; 4.1	103.50
Kerangas Forest	Tanah Putih Estate	1.3; 2.3; 3; 4.1	139.39
<b>Total</b>			<b>440.72</b>

Based on the data above, it can also be seen that there is a difference in the data on the area of the HCV area for the scope of certification from the results of the recertification audit, this is due to the company's re-delineation that adjusts to the latest actual conditions. However, when referring to the HCV area management document carried out by the company for the 2021 period, the management area still refers to the initial identification results, which is **599.48 Ha** because the entire HCV area owned by the company is still within the company's management area although currently some of the HCV area is into the plasma area.

### 7.12.3

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

### 7.12.4

Based on the results of HCV identification, it is known that there is an HCV area within the company's management area of 599.48 Ha with several types of RTE species consisting of mammals, Aves and herpetofauna. The company has compiled and determined the HCV management plan in the 2017 - 2021 HCV Management Program Matrix document with the scope of management and targets every year. An integrated management plan is developed in consultation with relevant stakeholders and covers areas that are directly managed and takes into account the relevant wider landscape level. HCV is maintained and cared for by the company by providing boundary markers, signboards and trenches that surround the entire HCV area of the heath forest. In addition to the 5-year management plan, the company also has a management plan prepared annually which aims to update management and monitoring needs, its annual programs include:

- Monitoring of areas that have been designated as HCV areas, river borders and heath forests on a regular basis to see threats.
- Conduct outreach to all employees and the surrounding community, as well as invite the community to conduct participatory monitoring of HCV areas.
- Conduct rapid surveys for flora and fauna inventory
- Manufacture, installation and maintenance of boundary markers in the form of red markers
- Carry out monitoring and maintenance of information boards
- Plant enrichment in riparian areas and heath forests with local plant species
- Identify and establish communication with communities already working in HCV areas.

The implementation of HCV management and monitoring for 2021 is carried out in accordance with the 2021 HCV management plan where the timing and intensity of implementation are also appropriate, which can be shown based on the following documents:

- Planting woody plants on riverbanks, since 2015 it is known that there have been plantings consisting of Angsana, Mahogany, Acacia, Pulai, Belangiran, Pantung, Jelutung and Vertifer Grass species.
- Socialization related to awareness and prevention of forest and land fires as well as conservation and protection of wildlife which was carried out simultaneously throughout the Estate on 8 - 13 April 2022 with a total of 304 participants who participated in the socialization.
- Indirect socialization by installing information boards and warning signboards related to conservation areas and the presence of protected rare plants and animals in places that are easily visible, such as park entrances, Estate roads that are often crossed by the community, and other strategic places.

- Flora and Fauna Survey conducted in July 2022.

The company also has a map of the HCV area, water flow and topography with a scale of 1:55,000, the map is also equipped with information about: map title, cardinal directions, map legend, map update date which is October 1, 2020, and map source. The company also conducts a review related to management and monitoring activities in 2021 as evidenced in the 2021 HCV Action Plan Report and Review which contains evaluation and management and monitoring recommendations as an effort to improve HCV management activities in 2022.

Regarding OFI in the previous surveillance, the company has re-delineated and updated data on land cover types in the HCV area that is included in the scope of certification where currently from **440.72 Ha** of conservation area consists of **215.78 Ha** Forested area and **224.94 Ha** Non-Forested area in the form of oil palm and swamp. In addition, field observations also show that the company has completed marking of chemical application boundaries and HCV areas in locations that are easily accessible and prone to chemical applications. Based on this, the company has made improvements from OFI in the previous surveillance.

#### 7.12.5

The company has identified the needs of the community as well as the areas needed by the affected community to meet their basic needs, taking into account the potential for positive and negative changes in their livelihoods as a result of the company's operational activities. This can be proven by the mediation between the company and the community around the Sawahan Estate (SWE) in handing over the HCV area of the river border that has been occupied and already planted with oil palm by the community to be managed by the company but without causing conflict with the owner of the oil palm plantation. This condition has been managed optimally by the company which can be proven from the 2021 SIA Management report document as well as evidence of mediation that has been carried out since 2015 where the company has identified this and carried out activities to minimize risks and impacts for both the community and the community. for the environment, for example by providing regular socialization to the community not to apply chemicals in river border areas to avoid criticism, not to clear land by burning because the area is peatland, and so on.

The unit of certification has also considered various land tenure and management options to protect the HCV area in a way that also protects the rights and livelihoods of local communities. Because the area managed by the company is still partly forest and river border natural habitat, and there is an HCV area that is directly adjacent to settlements, the level of potential conflict between the HCV area and the community is quite high, as has happened in the Lenggana River Border HCV area, which is currently entirely cleared. become a community oil palm area.

The results of the field visit to the HCV area managed by the company, it was found that there were no HCV 5 and 6 areas where the rights to culture and important places for the surrounding community were not identified in the company area. The company's environmental conditions both within the scope and in the community, area is almost entirely planted areas of oil palm. Currently, the company also has an agreement with the surrounding community, for example for monitoring and patrol activities, the company has made an agreement with the community who are active in the company's area not to hunt and trade wildlife.

#### 7.12.6

The Certification Unit already has a policy set out in procedures related to the protection of endangered species with document number SOP.EHS.MBD-01 concerning SOPs for Monitoring Biodiversity which is effective on June 1, 2019. In addition, the company also has a Sustainability Policy Number GAHL.SP.SUS. 01 which took effect on June 25, 2019. In general, the two documents describe preventive and repressive measures in an effort to protect protected wild animals and plants such as the principle of sustainability, all employees are advised not to hunt, capture, kill and sell endangered protected animals and plants. extinct and report any such activity. 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 the applicable laws and regulations. The company also put up no hunting boards with photos of the species and sanctions for violating government regulations in all HCV areas.

The information also applies sanctions for employees in the form of disciplinary action in accordance with the provisions of national law which are also listed on the HCV signboard which explains that "anyone who violates will be reported to the authorities with criminal threats and fines in accordance with Law Number 41 of 1999". The sanction is imposed by the company by giving the first warning letter to employees who violate work rules, among others, such as: carrying out activities that are not related to work for personal gain within the company environment such as hunting, trading animals and cutting forests. Based on interviews with 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 keeping wild animals within the company's environment. The procedure for animal protection also regulates the existence of sanctions or sanctions for those who violate these provisions.

In addition, the company has also conducted socialization about the existence of endangered plants and animals to all employees and the surrounding community which is shown in the minutes of socialization documents, for example carried out to employees on 8 – 13 April 2022 and carried out to the community and contractors on September 17, 2021. All activities can be proven by photos and attendance list attached to the document. Indirect socialization is also carried out by installing information boards and brochures warning signs related to conservation areas and the presence of endangered plants and animals that are protected in places that are easily visible, such as area entrances, regional roads that are often crossed by the community, and other places other strategic areas such as offices, and other public facilities. The results of field visits to several conservation areas indicate that the company has managed protected areas such as replanting local species, not logging, using no chemicals, and installing HCV signboards and prohibiting hunting and burning to avoid and prevent illegal hunting and/or encroachment of the area. HCV. Several warning signs have been posted regarding the prohibition of hunting 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 prohibiting the hunting of protected animals, burning, and marking the boundaries of conservation areas.

### 7.12.7

Monitoring of protected areas in the period of 2021 is carried out regularly every week to ensure the security of the area. Monitoring activities were carried out in several locations of river border and heath forest. This monitoring is carried out to see the progress of the results of HCV management from the initial stage to the current condition. The company also monitors the diversity of flora and fauna which is routinely carried out every year by showing the results of HCV monitoring carried out in 2021. The results of observing fauna in the plantation area still found several protected species that are included in the protection status according to IUCN, CITES and PermenLH No. 106 of 2018. The results of interviews with employees also stated that Honey Bear (*Helarctos malayanus*) was often found around the HCV area of the heath forest and in 2018 there were still Orangutans (*Pongo Pygmaeus*) crossing the plantation area of the Tanah Putih Estate where the HCV area was the heath forest. is at. Based on the results of field observations, there are also many animals such as Monitor Lizard (*Varanus salvator*), Long Tailed Macaque (*Macaca fascicularis*) and White-breasted waterhen (*Amauornis phoenicurus*).

The company also conducts annual monitoring and evaluation for the management of HCV areas where this activity aims to identify risks and impacts on conservation areas and improve protection efforts. The company also follows up on the improvement of the HCV area management plan which is made every 5 years which is carried out by involving all relevant stakeholders in the company's operational areas such as the surrounding community, especially landlords and law enforcement with the last evaluation conducted on 17 - 20 September 2021. Some of the activities proposed based on the HCV Management and Monitoring Plan document at PT Agro Bukit for the 2022-2027 period have several focus activities, including:

- HCV review/ re-identification and/or mapping
- Socialization and delineation of HCV by means of Routine Inspections to identify and monitor developing issues, establish communication with stakeholders, and conduct training/awareness of KBKT management and monitoring at the staff and management levels.
- Protection/Enforcement of applicable regulations, by socializing the prohibition on hunting to employees: such as through briefings, training, making signboards, leaflets, etc., Preventing business activities from clearing land/fields in riparian areas and Preventing land fires by socializing the prohibition of burning land, forming a land fire emergency response team and monitoring using hotspot data from satellites.
- Land restoration and rehabilitation in degraded areas
- Plantation Operational Management Practices by prohibiting the application of fertilizers and pesticides in riparian buffer areas.
- Monitoring of Biodiversity and its ecosystem.

All evaluation results will be reviewed and will be adjusted to the HCV management program in the 2022 period. The evaluation results also show an increase in the results of HCV area management where for areas that were previously open areas then restoration with forestry plants has been carried out since 2019, currently the condition of the plants has improved. have a diameter of more than 10 cm and are well preserved.

**Status: Comply**



**3.2 Conformity Checklist of Certificate and Trademark Use**

<b>1.</b>	<b>Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client</b>	<b>X or√</b>
<b>ASA 1-2</b>	PT. Agro Bukit were not use the certificate and trademark whether on-product or off-product	√
	<b>Status: Comply</b>	
<b>2.</b>	<b>Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use</b>	<b>X or√</b>
<b>ASA 1-2</b>	PT. Agro Bukit were not use the certificate and trademark whether on-product or off-product	√
	<b>Status: Comply</b>	
<b>3.</b>	<b>Implementation of Certificate and Trademark is not used on product</b>	<b>X or√</b>
<b>ASA 1-2</b>	PT. Agro Bukit were not use the certificate and trademark whether on-product or off-product	√
	<b>Status: Comply</b>	
<b>4.</b>	<b>Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.</b>	<b>X or√</b>
<b>ASA 1-2</b>	PT. Agro Bukit were not use the certificate and trademark whether on-product or off-product	√
	<b>Status: Comply</b>	

### 3.3 Summary of RSPO Partial Certification.

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

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

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

MUTU Auditor has verified company partial certification and concludes that:

- There is no significant land conflicts which have not been declared above.
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labour disputes that are not being resolved through an agreed process.
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above.
- Based on the results of the latest assessment, there are 25.7 ha which are still in the HGU process due to measurement errors by the agency. The auditor has confirmed with land agency Kab. Nabire and currently it is estimated that by the end of the year the remaining HGU can be issued by the agency.

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

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> <li>Some PT's was conducted NPP Notification Audit, but the report under review by RSPO and not yet posting on the website: PT Sariwana Adi Perkasa, PT Sumber Hasil Prima, PT Sinar Sawit Andalan, PT Agrajaya Baktitama, PT Batu Mas Sejahtera, PT Sawit Makmur Sejahtera.</li> </ul> <p><b>Auditor Verification:</b></p> <ul style="list-style-type: none"> <li>PT KMS was conducted NPP Desk Study on January 2015. The notification was posted on 2016 by BSI.</li> <li>PT Nabire Baru was conducted on 4 September 2015 by BSI.</li> <li>PT Sumber Hasil Prima and PT Sinar Sawit Andalan was conducted NPP Desk Study on 4 September 2015 by BSI.</li> <li>PT Sariwana Adi Perkasa is waiting review for HCV report by HCV-RN.</li> <li>PT Agrajaya Baktitama, PT Batu Mas Sejahtera and PT Sawit Makmur Sejahtera was conducted NPP Desk Study on September 2015. It still waiting HCV report review from HCV-RN.</li> </ul>
2.2.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p><b>Company Group/Holding Statement:</b></p> <ul style="list-style-type: none"> <li>PT Sumber Hasil Prima/PT Sinar sawit Andalan: Status Box G: Close for Monitoring</li> <li>PT Nabire Baru, with the status of Complaint Box C: Panel Convened</li> </ul> <p><b>Auditor Verification:</b></p> <p><b>PT Sumber Hasil Prima &amp; PT Sinar Sawit Andalan</b> Complaints from Friends of Borneo dated 21 March 2013, The allegations are PT Sumber Hasil Prima and PT Sinar Sawit Handalan has failed to share with the communities effective plans on the development. The companies have also started land clearing works without Hak Guna Usaha. The communities are also disputing the companies right to the lands in the concessions and charging that there has not been a proper FPIC process. The company is also alleged to have used child labour in developing the plantations.</p> <p><b>Nabire Baru</b> Complaints from Yayasan Pusaka dated 19 April 2016. Allegations:</p> <ul style="list-style-type: none"> <li>Deforestation and plantings on peatlands</li> <li>Irregularities including development without EIA</li> <li>Sima Village within PT Nabire Baru concessions are suffered from severe flooding</li> <li>Failure in following proper FPIC process</li> <li>Excessive use of force including of state security forces</li> </ul> <p>Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
2.2.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p><b>Company Group/Holding Statement:</b> No</p> <p><b>Auditor Verification:</b> Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
2.2.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p><b>Company Group/Holding Statement:</b> Yes</p> <p><b>Auditor Verification :</b></p> <ul style="list-style-type: none"> <li>PT. Agro Indomas East Kalimantan (AIEK): Land legality compliance still same with NPP notification of PT. Agro Indomas East Kalimantan that reported on 16 June 2016. NPP assessment conducted by BSI.</li> <li>PT. Karya Makmur Sejahtera (KMS): Land legality compliance still same with NPP notification of PT. Karya Makmur Sejahtera that reported on 3 May 2016. NPP assessment conducted by BSI.</li> <li>PT. Nabire Baru (NB): Land legality compliance still same with NPP notification of PT. Nabire Baru that reported on 9 March 2017. NPP assessment conducted by BSI.</li> <li>PT. Sariwana Adi Perkasa (SAP): Land legality compliance still same with last draft NPP notification of PT. Sariwana Adi Perkasa that reported on 9 March 2017. NPP assessment conducted by BSI.</li> <li>PT. Sumber Hasil Prima (SAP): Has have cadastral map no. 06/2018 on 23 April 2018</li> <li>PT. Sinar Sawit Andalan (SSA): Has have cadastral map no. 09/2018 on 02 May 2018.</li> <li>PT. Agrajaya Baktitama (AJB): has held a committee meeting B on September 13, 2017 with minutes No. 48/HGU-HHP/BPN/2017</li> <li>PT. Batu Mas Sejahtera (BMS): there has been an Audit Notification Letter from Committee B (BPN) No. 2740 / 002-8 / 61 / XII / 2017 dated December 5, 2017 for PT Batu Mas Sejahtera</li> <li>PT. Sawit Makmur Sejahtera (SMS): has held a committee meeting B on September 13, 2017 with minutes No. 49 / HGU-HHP / BPN / 2017.</li> </ul>

### 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

NCR No.	:	2022.01	Issued by	:	Bayu Yogatama
Date Issued	:	12 February 2022	Time Limit	:	Next Surveillance (ASA-1.2)
NC Grade	:	Minor	Date of Closing	:	13 October 2022
Standard Ref. & Requirement	:	2.2.2 All contracts, including contracts with FFB suppliers, have separate clauses regarding the fulfillment of relevant legal obligations, and can be proven by the relevant third party.			
Evidence observed (filled by auditor):					
<ul style="list-style-type: none"><li>Based on the document review, it is known that the certification unit already has a list of Contractors and Suppliers for the 2022 Period consisting of 13 Contractors and 14 Suppliers.</li><li>The unit of certification can show the entire Cooperation Contract with 3rd parties including sale and purchase contracts with FFB suppliers. For example, the CPO &amp; PK Transport Agreement No.: PKS/SBM/CPO-PKO-TRANSPORT/II/2020/001 dated March 1, 2020 which was added on February 26, 2021 with a validity period of up to February 28, 2022. it is shown that the contract has included an obligation clause to the contractor to fulfill all applicable regulations in Indonesia such as possession of a driver's license for the driver, vehicle registration, wage obligations to employees according to the minimum wage, provision of PPE, involving workers in BPJS Health &amp; Employment and other obligations.</li><li>Until the audit activity is completed, the certification unit has not been able to show documented evidence to ensure that all contracted 3rd parties have complied with all applicable regulations as required in the contract.</li></ul>					
Non-Conformance Description (filled by auditor):					
The unit of certification has not been able to show documented evidence to ensure that all 3rd parties contracted have complied with all applicable regulations as required in the contract.					
Root Cause Analysis (filled by organization audited):					
Management is not aware of the evaluation of the implementation of regulatory compliance for all contractors.					
Corrective Action (filled by organization audited):					
<ul style="list-style-type: none"><li>The company evaluates compliance with relevant regulations of all contractors.</li><li>The company shows evidence of compliance with relevant regulations from all contractors.</li><li>Conduct socialization to company representatives and contractors regarding evaluation of regulatory compliance.</li></ul>					
Corrective Action (filled by organization audited):					
Conduct regular monitoring and socialization to company representatives and contractors regarding evaluation of regulatory compliance.					
Assessor Evaluation and Conclusion (filled by auditor):					
-					
Follow up on next audit (filled by auditor):					
Verify October 13, 2022					
The company shows evidence of improvement in the form of:					
<ul style="list-style-type: none"><li>The company shows an updated list of contractors for the period August 2022.</li><li>The company shows a compliance evaluation checklist for 2 CPO transporters, 2 PKE transporters, 6 FFB/EFB transporters, 1 EFB applicator contractor and 1 laterite procurement contractor as well as proof of compliance with regulations for SPK, salary slips, proof of BPJS payment and PPE inspection.</li></ul>					



- The company also showed socialization of the evaluation of compliance with regulations to representatives of employees and contractors on October 3, 2022, which was attended by 20 participants.

Based on the root of the problem, corrective actions and corrective actions as well as the evidence submitted, the non-conformities in this indicator are declared fulfilled and will be observed in the next assessment.

**Verified by** : **Kiki Fadli**

<b>NCR No.</b>	<b>: 2022.02</b>	<b>Issued by</b>	<b>: Bayu Yogatama</b>
<b>Date Issued</b>	<b>: 12 February 2022</b>	<b>Time Limit</b>	<b>: Next Surveillance (ASA-1.2)</b>
<b>NC Grade</b>	<b>: Minor</b>	<b>Date of Closing</b>	<b>: 13 October 2022</b>
<b>Standard Ref. &amp; Requirement</b>	<b>: 6.1.6 Evidence of equal pay for equal work coverage is available.</b>		

**Evidence observed (filled by auditor):**

Based on the results of the document review, several facts are known as follows:

- Internal Memo No. 005/AHL-SPU/HARI/XII/2021 dated December 15, 2021 regarding Adjustment of daily PKWT wages and SKUs in 2022. The document explains that the daily wage for SKU employees is IDR 115,489 / day + rice allowance and for daily PKWT employees IDR 120,589, / Day.
- Document of Implementing Rules for Payment of Inatura Allowance (cash) in lieu of Natura allowance (rice) to SKU employees (monthly and daily) dated December 31, 2013 which explains that employees with TK status (Not Married) receive a rice allowance of 15 kg / month. The price of rice per kg is Rp. 8500/kg. So, if it is denominated in rupiah, it is Rp. 127,500.
- Implementation of the calculation of rice per day (SKU-H workers) of Rp. 127,500 / 25 days so that the rice allowance per day is Rp. 5.100, -
- Referring to the explanation above, it is known that the daily wages for daily PKWT and SKU-H employees are the same, detailed in the following table:

Type of Working Relationship	Basic Wage	Rice Allowance	Total Wage per day
SKU-H	115.489	5.100	<b>120.589</b>
BHL	120.589	-	<b>120.589</b>

- Internal Memo Document No. 005/AB-IM/GMO/III/2020 dated March 30, 2020 regarding the revision of Loading rate & penalty is explained as follows:

Category	Base (ton)	Normal day premium
SKU-H	<b>4.8</b>	9000 /ton
BHL	<b>5.2</b>	9000/ton

*\*Premium is calculated based on tonnage after exceeding base*

- Study of workers' wages with No. register 19412312 (PKWT) for FFB loading work on January 13, 2022, it is known that workers can load 11.42 tons of FFB and get the following payments:

Tonnage	Premium price	Total (Rp)
5.2	Basis	120.589
6,22	9000/ton	55.980
11,42	-	176.569

**Non-Conformance Description (filled by auditor):**

The Unit of Certification has not yet been able to show evidence of implementing equal pay for the same scope of work.

<b>Root Cause Analysis (filled by organization audited):</b> Ignorance of the management in the implementation of this indicator, so that the management makes a tiering basis according to employee status.	
<b>Correction (filled by organization audited):</b> <ul style="list-style-type: none"> <li>The company sets the same basis for probation employee status and SKU</li> <li>The company improves the remuneration system in accordance with the provisions and demonstrates the implementation of the system</li> </ul>	
<b>Corrective Action (filled by organization audited):</b> The company monitors the wage system that has been implemented	
<b>Assessor Evaluation and Conclusion (filled by auditor):</b> -	
<b>Follow up on next audit (filled by auditor):</b> <b>Verify October 13, 2022</b> The company shows evidence of improvement in the form of: <ul style="list-style-type: none"> <li>Company shows internal memo No. 005/AB-IM/GMO/III/2020 dated March 28, 2022 regarding revision of loading rate incentive &amp; penalty which explains that the work base for FFB loading employees has been equated with probation status and SKU-H which is effective from April 1, 2022.</li> <li>The company demonstrated an improvement in the remuneration system that has adjusted to the internal memo above and its implementation for probation and SKU employees.</li> </ul> <p>Based on the root of the problem, corrective actions and corrective actions as well as the evidence submitted, the discrepancies in this indicator are declared fulfilled and will be observed in the next assessment.</p>	
<b>Verified by</b>	<b>: Kiki Fadli</b>

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

<i>NCR No.</i>	:		<i>Issued by</i>	:	
<i>Date Issued</i>	:		<i>Time Limit</i>	:	
<i>NC Grade</i>	:		<i>Date of Closing</i>	:	
<i>Standard Ref. &amp; Requirement</i>	:				
<b>Evidence observed (filled by auditor):</b> There is no Non conformity against RSPO Standard during this audits					
<b>Non-Conformance Description (filled by auditor):</b>					
<b>Root Cause Analysis (filled by organization audited):</b>					
<b>Correction (filled by organization audited):</b>					
<b>Corrective Action (filled by organization audited):</b>					
<b>Assessor Evaluation and Conclusion (filled by auditor):</b>					
<b>Follow up on next audit (filled by auditor):</b>					
<i>Verified by</i>	:				

**3.4.3. Opportunity for Improvement**

No	Ref. Std.	Description
1	2.1.1	<p><b>The unit of certification complies with all relevant laws and regulations.</b></p> <p>The company does not yet have a Surface Water Utilization Permit, but has carried out the permit processing process as evidenced by the Certificate Number 208/KET/BWS24/2022 dated October 1, 2022 issued by the Ministry of PUPR which states that the company has carried out the process of processing the Technical Recommendation for a Source Concession Permit. water power since August 30, 2021 and has fulfilled all the required documents. Currently, the permit cannot be issued due to obstacles from the ministry. Based on this, the company has improvement opportunities to speed up the process of obtaining surface water utilization permits and documenting the entire management process.</p>
2	6.7.3	<p><b>Workers use appropriate Personal Protective Equipment (PPE), and it is provided free of charge to all workers in the workplace, as protection in all operations that have potential hazards, such as pesticide application, machine operation, land preparation, and harvesting. Sanitation facilities are available for workers who use pesticides so that workers can remove PPE, clean themselves and put on their personal clothes.</b></p> <p>Based on the results of field observations in Division 4 Block C14, Sawahan Estate, it is known that there are 4 harvesters with the initials PLS, BND, AGT and DMN who do not use helmets when they move FFB to TPH. Helmet during FFB harvesting activities. Likewise, Grader Operators and tractor operators do not use helmet PPE when driving heavy equipment. From the results of the document review, it shows that the company has provided PPE in the form of helmets, boots, gloves and egrek gloves with proof of the handover of PPE on July 4, 2022. The company has also carried out inspections/monitoring of PPE every month which aims to ensure employees comply with the rules. company in terms of OHS. Based on this, the company has the opportunity to ensure that workers use appropriate protective equipment (PPE) as protection in all operations that have potential hazards, especially harvesting activities and lifting and transport operators.</p>
3	7.3.2	<p><b>There is evidence of waste disposal according to procedures that are fully understood by workers and managers.</b></p> <p>Based on the results of field observations in the residential area of Sawahan Estate and Sungai Lenggana Estate, it is known that for domestic waste management, the company has prepared a temporary trash can which will then be disposed of in the Landfill. However, waste was still found in the Sawahan Estate housing area in the form of mineral water packaging and plastic waste dumped in irrigation canals, as well as used lubricant packaging in the Sungai Lenggana Estate residential area. In addition, it was also found that there was reuse of used packaging in the form of jerry cans and used fertilizer sacks without any procedures for reusing used packaging. Based on this, the company has the opportunity to increase employees' understanding of domestic waste management and ensure that the reuse of used packaging activities has been regulated in the relevant procedures.</p>

**3.4.4. Noteworthy Positive Components**

No	Description
1	Consistency in following the RSPO assessment process
2	Good cooperation with the companion team
3	Disclosure of information in the audit process.

**3.5 Summary of Arising Issues from Public and Auditor Verification**



Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>Environmental Service of Kotawaringin Timur Regency</b> Head of Environmental Services 13 October 2022</p> <p>Based on the results of interviews with the Environment Agency, information was obtained that the company has completed and completed all the required licensing requirements and routinely reports the required environmental management results according to its schedule.</p> <p>The agency also added that the results of the field visit carried out in December 2021 had confirmed the field conditions were in accordance with the environmental standards set. The results of the visit did not reveal any problems that needed to be fixed by the company. The informant also stated that there was never any information related to fire incidents and environmental pollution that were reported to the Service from NGOs or the surrounding community.</p>	<p>There are no issues that need to be verified further, all information obtained from the results of the interviews has been submitted to the relevant indicators.</p>
<p><b>Plasma Cooperative</b> Rangkong Jaya Mandiri Cooperative 13 October 2022</p> <p>Based on the results of the interview, it was stated that the company had carried out its obligations as stated in the MoU and had cooperated very well. The determination of a valid price referring to the determination of the Plantation Service is also applied. The company can also show the entire use of the budget used in plantation maintenance. so that all members of the cooperative can believe that the cooperation carried out takes place honestly and without injustice. The company also very regularly and regularly informs the latest prices and makes payments.</p> <p>The informant stated that for approximately 5 years of working together, the company has carried out all the agreements contained in the work contract, there has never been a delay in payment or other matters related to the cooperative relationship. The assistance provided by the company is also in accordance with the RSPO principles where procedures regarding sustainable plantations are applied to the maximum. All members of the cooperative are also aware of protected areas (HCV) where locations that are allowed to remain as forests, may not be cleared, burned, and hunting is carried out in these areas.</p>	<p>There are no issues that need to be verified further, all information obtained from the results of the interviews has been submitted to the relevant indicators.</p>
<p><b>Labor union (Estate &amp; Mill)</b> 13 October 2022</p> <ul style="list-style-type: none"> <li>The company has provided PPE and wages in accordance</li> </ul>	<p>The auditor has verified related to employment and has been</p>



Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>with applicable regulations</p> <ul style="list-style-type: none"> <li>There are cases of work accidents in the plantations in 2021 and POM in 2022. The rights for the plantation workers including BPJS claims have been paid.</li> <li>The company routinely conducts high-risk health checks as well as periodic health checks.</li> <li>There are temporary workers but for maintenance and support work. The temporary work agreement has been submitted to the Manpower Office</li> <li>The company has provided socialization related to CLA, company policies, work procedures and others.</li> </ul>	<p>further explained in criterion 3.5 and principal 6.</p>
<p><b>Gender Committee</b></p> <ul style="list-style-type: none"> <li>The gender committee consists of male and female representatives</li> <li>No cases of sexual harassment in the last 2 year</li> <li>The company provides rest time for new mothers to breastfeed their children</li> <li>Menstrual leave is available with a mechanism to report to the foreman and will be examined at the clinic.</li> <li>Maternity leave is given 1.5 months before and 1.5 months after giving birth by showing the results of a doctor's examination.</li> <li>There is no difference between male workers and female workers. Every worker has equal rights in terms of employment opportunities and also anonymity protection/</li> </ul>	<p>There are no issues that need further clarification and this information has been explained in the relevant indicators.</p>
<p><b>FFB suppliers</b> <b>CV Naura Cemerlang</b></p> <p>The results of the interview stated that the interviewees had collaborated with the company since 2018, for more than 4 years with clear contracts and payments. no complaints regarding pricing and payment periods made by the company.</p> <p>The current management of oil palm plantations is managed independently and there is no company intervention in its management. the company only provides socialization related to the best agricultural techniques for oil palm and assists in preparing financial reports.</p> <p>Regarding the RSPO Certification information, the informant stated that he had been included in RSPO socialization activities several times. however, until now there has been no clear action taken by the company regarding the RSPO certification. the company is only limited to asking the legality of the land and collecting data on the location of the land it owns</p>	<p>There are no issues that need to be verified further, all information obtained from the results of the interviews has been submitted to the relevant indicators</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<b>FFB suppliers</b> <b>PT. Mitra Bumi Borneo</b>  <p>The results of the interview stated that the interviewees had collaborated with the company since 2016, for more than 6 years with clear contracts and payments. no complaints regarding pricing and payment periods made by the company.</p> <p>The current management of oil palm plantations is managed independently and there is no company intervention in its management. the company only provides socialization related to the best agricultural techniques for oil palm and assists in preparing financial reports.</p> <p>Regarding the RSPO Certification information, the informant stated that he had been included in RSPO socialization activities several times. however, until now there has been no clear action taken by the company regarding the RSPO certification. the company is only limited to asking the legality of the land and collecting data on the location of the land it owns</p>	<p>There are no issues that need to be verified further, all information obtained from the results of the interviews has been submitted to the relevant indicators</p>
<b>Labor Agency</b> <ul style="list-style-type: none"> <li>• Wages are in accordance with the regional minimum wage by 2022 regional regulations.</li> <li>• All workers have been registered with Social Security Agency of Employment and Social Security Agency of Health including contract/ Fixed Period Working Agreement status.</li> <li>• There are no workers under the age of 18.</li> <li>• No issues related to discrimination, forced labour, child labor, and sexual harassment were reported to the labor agency.</li> </ul>	<p>There is no negative issue that need further verification.</p>
<b>Transporter CPO</b> <b>CV Ain Ito</b> <ul style="list-style-type: none"> <li>• There are no complaints from transporters including the implementation of payments.</li> <li>• The company has conducted socialization/training related to the RSPO standard.</li> </ul>	<p>There is no negative issue that need further verification.</p>
<b>FFB suppliers</b> <b>CV Dinaya Mulya</b>  <p>The results of the interview stated that the interviewees had collaborated with the company since 2019, for more than 3 years with clear contracts and payments. no complaints regarding pricing and payment periods made by the company.</p> <p>The current management of oil palm plantations is managed independently and there is no company intervention in its management. the company only provides socialization related to the best agricultural techniques for oil palm and assists in preparing financial reports.</p>	<p>There are no issues that need to be verified further, all information obtained from the results of the interviews has been submitted to the relevant indicators</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Regarding the RSPO Certification information, the informant stated that he had been included in RSPO socialization activities several times. however, until now there has been no clear action taken by the company regarding the RSPO certification. the company is only limited to asking the legality of the land and collecting data on the location of the land it owns</p>	
<p><b>Agriculture Agency of Kotawaringin Timur District, Kalimantan Tengah Province</b></p>	<p>Until the time the ASA-1.2 audit was implemented, the agency's representatives had not responded willingly/unwillingly to be a resource person in public consultation activities.</p>
<p><b>Penyang and Rongkang Village (Village Head and Previous Land Owner)</b></p> <ul style="list-style-type: none"> <li>Currently, the company's relationship with the village is quite transparent and open, for example, the community has the opportunity to sell FFB to the company.</li> <li>The land compensation process that had previously been carried out did not have any problems or issues that harmed the community.</li> <li>Until now, there are no issues related to environmental pollution and fires around the village.</li> <li>Social relations are well established, where several proposals from the community have been responded to and have been realized by the company.</li> </ul>	<p>There's no negative issues need to further observation.</p>
<p><b>Kotawaringin Timur District National Land Agency</b></p> <ul style="list-style-type: none"> <li>The BPN admits that the process of land rights is still waiting for a follow-up from the company, but there have been positive developments regarding the change in Areas that have become APL (areas of other use)</li> <li>For HGUs already owned by the company, the company has routinely sent reports on the utilization of HGUs.</li> <li>The agency has never received a complaint or complaint regarding PT Agro Bukit for the last 12 months.</li> </ul>	<p>There's no negative issues need to further observation.</p>

4.0	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>
4.1	<b>Formal Sign-off of Assessment Findings</b>
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end; margin-top: 100px;"> <div style="text-align: center;"> <p>PT Agro Bukit – Sungai Binti Mill Management Representative</p>  <p><b><u>Donald Ginting</u></b> Friday, 28 October 2022</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><b><u>Briyogi Shadiwa</u></b> Friday, 28 October 2022</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Comm	Date of Contact	Response	
						Yes	No
1	Environmental Agency	Kotawaringin Timur District	Phone	-	13 Oct 2022	✓	
2	Labor Agency	Kotawaringin Timur District	Phone	-	13 Oct 2022	✓	
3	Plasma Cooperative	Kotawaringin Timur District	Phone	-	13 Oct 2022	✓	
4	Worker Union	Kotawaringin Timur District	Phone	-	13 Oct 2022	✓	
5	Gender Committee	Kotawaringin Timur District	Phone	-	13 Oct 2022	✓	
6	Agriculture Agency	Kotawaringin Timur District	Phone	-	13 Oct 2022		✓
7	Penyang and Rongkang Village	Kotawaringin Timur District	Phone	-	13 Oct 2022	✓	
8	Sawah Estate: • Harvester: 4 workers and 1 foreman • fertilizer worker: 5 workers and 1 foreman • Spraying worker: 4 workers and 1 foreman	Kotawaringin Timur District	-	-	13 Oct 2022	✓	
9	Sungai Binti Mill • Boiler Operator • Engine Room Operator • Sterilizer Operator • Clarification Operator • Sortation Worker • Bunch Loader Operator • Loading Ramp Operator • Agrochemicals Warehouse • Spare part and PPE warehouse • Workshop • Fire Extinguisher warehouse	Kotawaringin Timur District	-	-	12 Oct 2022	✓	
10	Tanah Putih Estate • Harvester: 5 workers and 1 foreman • fertilizer worker: 8 workers and 1 foreman • Spraying worker: 4 workers and 1 foreman	Kotawaringin Timur District	-	-	12 Oct 2022		
11	Sungai Lenggana Estate: • Harvester: 4 workers and 1 foreman	Kotawaringin Timur District	-	-		✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Comm	Date of Contact	Response	
						Yes	No
	<ul style="list-style-type: none"> <li>fertilizer worker: 5 workers and 1 foreman</li> <li>Spraying worker: 4 workers and 1 foreman</li> <li>Daycare worker</li> <li>Emplacement worker</li> </ul>				13 Oct 2022		
12	Sungai Binti Estate: <ul style="list-style-type: none"> <li>Harvester: 4 workers and 1 foreman</li> <li>fertilizer worker: 5 workers and 1 foreman</li> <li>Spraying worker: 4 workers and 1 foreman</li> </ul>	Kotawaringin Timur District	-	-	12 Oct 2022	✓	
13	NGO Yayorin, Kalimantan Tengah	-	<a href="mailto:yayorinindonesia@gmail.com">yayorinindonesia@gmail.com</a>	-	27 September 2022		✓
14	NGO WALHI, Kalimantan Tengah	-	<a href="mailto:walhi.kalteng@gmail.com">walhi.kalteng@gmail.com</a>	-	27 September 2022		✓
15	NGO Borneo Nature Fondation, Kalimantan Tengah	-	<a href="mailto:info@borneonature.org">info@borneonature.org</a>	-	27 September 2022		✓
16	NGO Save Our Borneo, Kalimantan Tengah	-	<a href="mailto:info@saveourborneo.org">info@saveourborneo.org</a>	-	27 September 2022		✓
17	NGO Lestari Hutanku, Kalimantan Tengah	-	<a href="mailto:nfo@lestari-hutanku.com">nfo@lestari-hutanku.com</a>	-	27 September 2022		✓



**Appendix 2. Assessment Program**

DATE	10 – 14 October 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
<b>Monday, 10 October 2022</b>		
05.30 – 11.30 12.00 – 13.00 14.15 – 16.00	<b>JAKARTA (CGK) ▯ SURABAYA (SUB): JT-748 ▯ SAMPIT (SMQ): IW-1804</b> <b>SAMPIT – PT AGRO BUKIT</b> <b>Opening meeting (Video Conference)</b> <ul style="list-style-type: none"> <li>Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li> <li>Auditor Team Speech (Introduction, Audit, Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li> </ul>	<b>All Auditor</b> <b>All Auditor</b> <b>All Auditor</b>
16.00 – 17.00	<b>Verification of Basic Information:</b> <ul style="list-style-type: none"> <li>FFB Production Data</li> <li>Scope of Certification</li> <li>Map</li> </ul>	<b>All Auditor</b>
<b>Tuesday, 11 October 2022</b>		
08.00 – 12.00	<b>Field Observation to Tanah Putih and Sungai Binti Estate</b> <b>Aspect to be verified:</b> <ul style="list-style-type: none"> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>Implementation of Occupational Health &amp; Safety Aspect</li> <li>Implementation of Employment Procedure and Mechanism Aspect</li> <li>Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>Interview with related personals during field observation.</li> </ul>	<b>ALS &amp; BRI</b> <b>KID</b>  <b>ART</b>  <b>ALS &amp; BRI</b> <b>KID</b> <b>KID</b> <b>KID, ALS &amp; BRI</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 17.00	<b>Field observation to Sungai Binti Mill:</b> <ul style="list-style-type: none"> <li>Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Dispatch CPO)</li> <li>Occupational Health &amp; Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond)</li> <li>Implementation of Employment Procedure and Mechanism Aspect</li> <li>Presentation of Daily Progress</li> </ul>	<b>ALS &amp; BRI</b>  <b>KID</b>  <b>ART</b> <b>All Auditor</b>
<b>Wednesday, 12 October 2022</b>		
08.00 – 12.00	<b>Field Observation to Sawahan and Sungai Lenggana Estate</b> <b>Aspect to be verified:</b> <ul style="list-style-type: none"> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>Implementation of Occupational Health &amp; Safety Aspect</li> </ul>	<b>ALS &amp; BRI</b> <b>KID</b>  <b>ART</b>  <b>ALS &amp; BRI</b>

	<ul style="list-style-type: none"> <li>Implementation of Employment Procedure and Mechanism Aspect</li> <li>Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>Interview with related personals during field observation.</li> </ul>	KID KID KID, ALS & BRI
12.00 – 14.00	<b>Break</b>	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> <li>Continue Field Observation (If needed)</li> <li>Document review and completing audit checklist.</li> <li>Presentation of Daily Progress</li> </ul>	All Auditor
<b>Thursday, 13 October 2022</b>		
08.00 – 12.00	<ul style="list-style-type: none"> <li>Document review and completing audit checklist.</li> <li>public consultation with stakeholder to relevant agency in Kotawaringin Timur Regency by Phone</li> <li>Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier directly or by phone.</li> </ul>	All Auditor KID & ART ALS & BRI
12.00 – 14.00	<b>Break</b>	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> <li>Document review and completing audit checklist.</li> <li>Presentation of Daily Progress.</li> </ul>	All Auditor
<b>Friday, 14 October 2022</b>		
09.00 – 11.00	<b>Closing Meeting (Video Conference):</b> <ul style="list-style-type: none"> <li>Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion)</li> <li>Comments, Responses and Questions</li> </ul>	All Auditor
11.00 – 12.00	PT AGRO BUKIT → SAMPIT	All Auditor
14.05 – 19.35	SAMPIT (SMQ) → SURABAYA (SUB): QG-1463 → JAKARTA (CGK): QG-719	All Auditor