

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

[✓] Surveillance

Name of Management Organisation : Agronusa Investama POM – PT Agronusa Investama subsidiary of Wilmar International, Ltd
 Plantation Name : Agronusa Investama Estate, Sentama Lestari Smallholder and Cempaka Biru Smallholder
 Location : Village of Semanga, District of Sejangkung, Regency of Sambas, Province of Kalimantan Barat, Indonesia.
 Certificate Code : **MUTU-RSPO/024**
 Date of Certificate Issue : 14 November 2019 Date of License Issue : 28 December 2022
 Date of Certificate Expiry : 13 November 2024 Date of License Expiry : 13 November 2023

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.3	09 to 13 August 2022	Hasiholan Sihombing (Lead Auditor), Afiffudin, Rahmat Abdiansyah, and Sentot Adi Subandono	Moh Arif Yusni	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.3	24 November 2022

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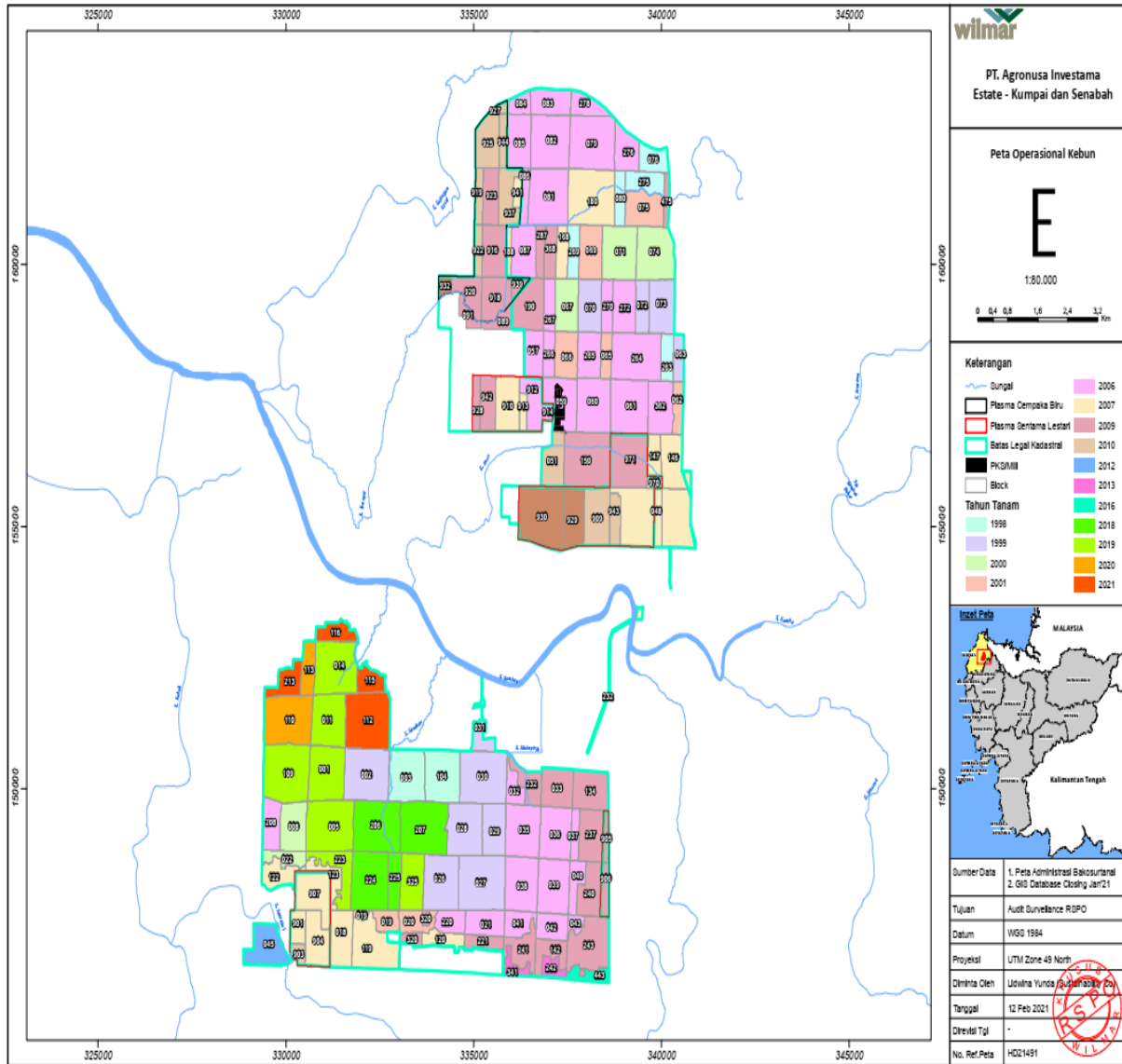
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Figure 1. Location Map of PT Agronusa Investama



Figure 2. Operational Map of PT Agronusa Investama – ANI Sambas POM



Abbreviations Used

AGM	:	Assistant General Manager
AMDAL	:	<i>Analisa Mengenai Dampak Lingkungan</i>
ANI	:	Agronusa Investama
ASA	:	Annual Surveillance Assessment
BLH	:	<i>Badan Lingkungan Hidup</i>
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Security Agency)
CB	:	Certification Body
CHE	:	Cholinesterase
CITES	:	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CLA	:	Collective Labour Agreement
CPO	:	Crude Palm Oil
CR	:	Collection Road
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Community Social Responsibility
EFB	:	Empty Fruit Bunch
EHS	:	Environment, Health and Safety
FFB	:	Fresh Fruit Bunch
FM	:	Field Manager
FPIC	:	Free, Prior, Informed, Consent
FR	:	Frequency Rate
GHG	:	Greenhouse Gas
GPS	:	Global Positioning System
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title)
HIRADC	:	Hazard Identification, Risk Assessment, and Determine Control
KER	:	Kernel Extraction Rendement
LKS	:	Lembaga Kerjasama (Cooperation Institution)
LUCA	:	Land Use Change Analysis
MB	:	Mass Balance
MEC	:	Malaysia Environment Consultant
MM	:	Mill Manager
MR	:	Main Road
MSDS	:	Material Safety Data Sheet
OER	:	Oil Extraction Rendement
OHS	:	Occupational Health and Safety
P&C	:	Principles and Criteria
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> (OHS Committee)
P3K	:	<i>Pertolongan Pertama Pada Kecelakaan</i> (First Aid)
PELIKHA	:	<i>Pejuang Lintas Khatulistiwa</i>
PIC	:	Person In Charge
PJK3	:	<i>Perusahaan Jasa Keselamatan dan Kesehatan Kerja</i> / Occupational Safety and Health Service Company
PIPIB	:	<i>Peta Indikatif Penghentian Pemberian Izin Baru</i> (Indicative Map of Termination of Granting New Permits)
PK	:	Palm Kernel
PKS	:	<i>Pabrik Kelapa Sawit</i>
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent

PPE	:	Personal Protective Equipment
PT ANI	:	PT Agronusa Investama
RKL-RPL	:	<i>Rencana Pengelolaan Lingkungan - Rencana Pemantauan Lingkungan</i>
RSPO	:	Roundtable on Sustainable Palm Oil
SCCS	:	Supply Chain Certification Standard
SDS	:	Safety Data Sheet
SERBUK	:	<i>Serikat Buruh Kerakyatan</i>
SHE	:	Safety Health Environment
SOP	:	Standard Operational Procedure
SPSI Hukatan	:	<i>Serikat Pekerja Seluruh Indonesia Kehutanan Perakayuan dan Pertanian</i>
SR	:	Severity Rate
UKL-UPL	:	<i>Upaya Pengelolaan Lingkungan - Upaya Pemantauan Lingkungan</i>
UPTD	:	<i>Unit Pelaksana Teknis Daerah</i>
WHO	:	World Health Organization
WOW	:	Women Working Group

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020. RSPO Certification System for Principles and Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020. 	
1.2	Organization Information		
1.2.1	Organization name listed in the certificate	PT Agronusa Investama – Wilmar International Ltd	
1.2.2	Contact person	Jules Parapat	
1.2.3	Organization address and site address	<ul style="list-style-type: none"> <u>RSPO registered company:</u> 56 Neil Road Singapore. Singapore 088 030. <u>Head Office:</u> Multivision Tower Lt. 15 Jl. Kuningan Mulya Blok B9, Kuningan, Jakarta 12980 – Indonesia. 	
1.2.4	Telephone	(62-21) 2938 - 0777	
1.2.5	Fax	-	
1.2.6	E-mail	jules.parapat@id.wilmar-intl.com	
1.2.7	Web page address	www.wilmar-international.com	
1.2.8	Management Representative who completed the application for certification	Jules Sonny Parapat (Indonesia Certification Lead)	
1.2.9	Registered as RSPO member	2-0017-05-000-00, 29 September 2004	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	ANI Palm Oil Mill (POM) and its supply bases, i.e.: ANI Estate, Sentama Lestari Cooperative and Cempaka Biru Cooperative	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Agronusa Investama POM	Semanga Village, Sejangkung Sub District, Sambas District, Kalimantan Barat Province, Indonesia	N 01° 25' 13.397" E 109° 30' 28.634"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Agronusa Investama Estate	Semanga Village, Sejangkung Sub District, Sambas District, Kalimantan Barat Province, Indonesia	N 01° 25' 20.143" E 109° 33' 57.902"
	Sentama Lestari Cooperative (999 Smallholders)	Semakuan and Semanga Village, Sejangkung Sub District, Sambas District, Kalimantan Barat Province, Indonesia	N 01° 25' 40.980" E 109° 31' 0.112"

	Cempaka Biru Cooperative (226 smallholders)	Sajingan Kecil and Semanga Village, Sejangkung Sub District, Sambas District, Kalimantan Barat Province, Indonesia	N 01° 28' 38.3"	E 109° 31' 29.7"	
1.5	Description of Area Statement				
1.5.1	Tenure				
	• State		8,391.61	ha	
	• Community		-	ha	
1.5.2	Area Statement				
	Description	ANI Estate (ha)	Sentama Lestari (ha)	Cempaka Biru (ha)	Total Area (ha)
	• Total area	6,986.50	935.29	469.82	8,391.61
	• Mature area	5,605.96	907.93	451.46	6,965.35
	• Immature area	988.54	-	-	988.54
	• Mill	19.92	-	-	19.92
	• Road, Housing, Drainage	240.85	22.23	13.24	276.32
	• Nursery	8.02	-	-	8.02
	• Unplanted Replanting Area	26.86	-	-	26.86
	• Non-plantable area	46.94	1.47	-	48.41
	• HCV	49.41	3.66	5.12	58.19
1.6	Planting Year and Cycles				
1.6.1	Age profile of planting year				
	Planting Year	Hectarage (ha)			
		ANI Estate	Sentama Lestari	Cempaka Biru	Total Area
	1999	680.36	-	-	680.36
	2000	337.68	-	-	337.68
	2001	286.35	-	-	286.35
	2005	157.87	-	-	157.87
	2006	1,898.27	56.75	-	1,955.02
	2007	612.77	346.62	12.30	971.69
	2009	773.83	197.31	248.07	1,219.21
	2010	52.63	115.94	179.40	347.97
	2011	-	191.31	11.69	203.00
	2012	61.86	-	-	61.86
	2013	38.87	-	-	38.87
	2016	23.64	-	-	23.64
	2018	356.23	-	-	356.23
	2019 (Mature)	325.60	-	-	325.60
	Mature Area	5,605.96	907.93	451.46	6,965.35

	2019 (Immature)	330.82	-	-	330.82		
	2020	150.19	-	-	150.19		
	2021	299.82	-	-	299.82		
	2022	207.71	-	-	207.71		
	Immature Area	988.54	-	-	988.54		
	TOTAL	6,594.50	907.93	451.46	7,953.89		
1.6.2	New Planting area after January 2010		-				
1.6.3	Planting Cycle		1 st Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Agronusa Investama POM	60	201,371.05	42,088.74	20.90	9,131.91	4.53
	*Production data source from August 2021 to July 2022						
	**The FFB processed was higher than the FFB received because there was FFB from the previous period that was processed in this period.						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (ha)	Production Area (ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)	Supplied to Mill	
						FFB (tonnes/ year)	%
	Agronusa Investama Estate	6,986.50	5,605.96	108,271.94	19.31	104,485.29	96.50
	Sentama Lestari Cooperative (1,037 Smallholders)	935.29	907.93	12,398.25	13.66	12,014.08	96.90
	Cempaka Biru Cooperative (266 smallholders)	469.82	451.46	6,325.95	14.01	6,239.56	98.63
	TOTAL	8,391.61	6,965.35	126,996.14	18.23	122,738.92	96.65
	*Production data source from August 2021 to July 2022						
1.7.3	FFB description from other source						
	Name of sources/Organization (RSPO certified / non-certified)	Type of Organization	Number of smallholders	Production Area (ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Serimaram Estate (RSPO Non-certified)	PT Agronusa Investama	-	437.61	9,609.76		
	Plasma Serimaram Cooperative (RSPO Non-certified)	Scheme Smallholder PT ANI	61	120.39	1,531.95		
	Plasma Anugrah Semaro Cooperative (RSPO Non-certified)	Scheme Smallholder PT ANI	67	125.28	2,049.84		
	Pusaka Abadi Nan Jaya	Scheme Smallholder PT ANI	100	302.32	1,783.58		

	Cooperative (RSPO Non-certified)							
	Buluh Cawang Plantation Estate (RSPO Non-certified)	PT Buluh Cawang Plantation – subsidiary of Wilmar Ltd	-	1,140.88	17,061.64			
	Plasma Buluh Cawang Plantation (RSPO Non-certified)	Associate smallholder PT Buluh Cawang Plantation	61	403.78	1,540.90			
	Other (RSPO Non-certified)	Outgrower	-	-	44,893.93			
	TOTAL				78,471.60			
	<i>*Production data source from August 2021 to July 2022</i>							
1.7.4	Product categories	FFB, CPO, PK						
1.8	Tonnage of Product							
1.8.1	Past Annual Claim Certified Product	Last Year Projected Certified Volume (14 Nov 2021 – 13 Nov 2022) (MT)		Last Year Actual Certified Volume (August 2021 to July 2022) (MT)				
	FFB Production	130,000		122,738.92				
	CPO Production	27,300		26,778.13				
	Palm Kernel (PK) Production	6,500		5,637.78				
	<i>Notes: CPO & PK Production added with opening stock on July 2021</i>							
1.8.2	Product selling							
	Type of selling product	Actual selling product for last year (August 2021 to July 2022) (MT)						
	CSPO sold as RSPO certified product	25,803.42						
	CSPK sold as RSPO certified product	5,488.36						
	CSPO sold under another scheme	0						
	CSPK sold under another scheme	0						
	CSPO sold as conventional	0						
	CSPK sold as conventional	0						
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates	Total Area (ha)	Production Area (ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Agronusa Investama Estate	6,986.50	5,605.96	115,500	20.60			
	Sentama Lestari Cooperative (1,037 Smallholders)	935.29	907.93	13,000	14.32			
	Cempaka Biru Cooperative (266 smallholders)	469.82	451.46	6,500	14.40			
	TOTAL	8,391.61	6,965.35	135,000	19.98			
	<i>*Projected FFB production for 12 months certificate</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (ton)	Extraction (%)	Out put (ton)	Extraction (%)	

	Agronusa Investama POM	60	135,000	28,500	21.11	6,500	4.81	MB
*Projected CPO and PK production for 12 months certificate								
1.9	Other Certifications							
	Others		-					
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	Mill	Time Bound Plan						
	Indonesia – Kalimantan Region							
	Mustika Sembuluh 1 POM Mustika Sembuluh 2 POM (PT Mustika Sembuluh)	2010	Mustika Sembuluh 1	2010	Central Kalimantan	Certified		
		2015	Mustika Sembuluh 2	2010	Central Kalimantan	Certified		
			Mustika Sembuluh 3	2010	Central Kalimantan	Certified		
			KUD Bitu Maju Bersama	2014	Central Kalimantan	Certified		
	Kerry Sawit Indonesia 1 POM Kerry Sawit Indonesia 2 POM (PT Kerry Sawit Indonesia)	2011	Kerry Sawit Indonesia 1	2011	Central Kalimantan	Certified		
			Kerry Sawit Indonesia 2	2011	Central Kalimantan	Certified		
			Kerry Sawit Indonesia 3	2011	Central Kalimantan	Certified		
		2015	KUD Karya Bersama	2023	Central Kalimantan	-		
			KUD Sejahtera Bersama	2023	Central Kalimantan			
			KUD Tabiku Makmur	2023	Central Kalimantan			
		2023	KUD Kosudra	2023	Central Kalimantan			
	Bumi Sawit Kencana POM (PT Bumi Sawit Kencana)	2013	Bumi Sawit Kencana 1	2013	Central Kalimantan	Certified		
			Bumi Sawit Kencana 2	2013	Central Kalimantan	Certified		
	POM 1 and POM 2 (PT Sarana Titian Permata)	2023	Sarana Titian Permata 1	2023	Central Kalimantan	-		
			Sarana Titian Permata 2	2023	Central Kalimantan	-		
			Sarana Titian Permata 3	2023	Central Kalimantan	-		
	Mentaya Sawit Mas POM (PT Mentaya Sawit Mas)	2015	Mentaya Sawit Mas 1	2015	Central Kalimantan	Certified		
			Mentaya Sawit Mas 2	2015	Central Kalimantan	Certified		
			KUD Karya Makmur Pahirangan	2023	Central Kalimantan	-		
	Rimba Harapan	2015	Rimba Harapan Sakti 1	2015	Central Kalimantan	Certified		

Sakti POM (PT Rimba Harapan Sakti)		Rimba Harapan Sakti 2	2015	Central Kalimantan	Certified
		Serba Usaha Makmur Sejahtera Cooperative	2023	Central Kalimantan	-
Karunia Kencana Permaisejati POM (PT Karunia Kencana Permaisejati)	2017	Karunia Kencana Permaisejati 1	2017	Central Kalimantan	Certified
		Karunia Kencana Permaisejati 2	2017	Central Kalimantan	Certified
		Karunia Kencana Permaisejati 3,	2017	Central Kalimantan	Certified
Agro Nusa Investama POM (PT Agro Nusa Investama (Sambas))	2019	Agro Nusa Investama (Sambas) Estate	2019	Kalimantan Barat	Certified
		KUD Cempaka Biru	2019	Kalimantan Barat	Certified
		KUD Sentama Lestari	2019	Kalimantan Barat	Certified
		Srimaram Estate	2023	Kalimantan Barat	-
		Srimaram Cooperative	2023	Kalimantan Barat	-
		Pusaka Abadi Nan Jaya Cooperative	2023	Kalimantan Barat	-
Bumipratama Khatulistiwa POM (PT Bumi Pratama Khatulistiwa)	2016	Bumi Pratama Khatulistiwa Estate	2016	Kalimantan Barat	Certified
		PT Buluh Cawang Plantation	2023	Kalimantan Barat	-
		KUD Tuah Jubata	2023	Kalimantan Barat	-
Agro Nusa Investama (Landak) POM PT Agronusa Investama - Pahauman	2023	PT Agronusa Investama Pahauman Estate	2023	Kalimantan Barat	-
		Pratama Procentindo Estate (PT Pratama Procentindo)	2023	Kalimantan Barat	-
Agro Palindo Sakti POM (PT Agro Palindo Sakti 2)	2023	Agro Palindo Sakti Estate	2023	Kalimantan Barat	-
		Putra Indotropical Estate (PT Putra Indotropical Estate)	2023	Kalimantan Barat	-
		Daya Landak Plantation Estate (PT Daya Landak Plantation)	2023	Kalimantan Barat	-
		Indoresin Putra Mandiri (PT Indoresin Putra Mandiri)	2023	Kalimantan Barat	-
Indonesia – Sumatera Region					

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

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

Sri Kamusan POM (PPB Oil Palms Berhad)	2011	Sri Kamusan	2011	Sandakan, Sabah, Malaysia	Certified
		Hibumas 1	2011	Sandakan, Sabah, Malaysia	Certified
		Hibumas 2	2011	Sandakan, Sabah, Malaysia	Certified
		Jebawang	2011	Sandakan, Sabah, Malaysia	Certified
		Sekar Imej	2011	Sandakan, Sabah, Malaysia	Certified
		Sapi Sugut	2011	Sandakan, Sabah, Malaysia	Certified
		Laba Utama (Div of Jebawang)	2023	Sandakan, Sabah, Malaysia	-
Suburmas POM (PPB Oil Palms Berhad)	2023	Suburmas	2023	Bintulu, Serawak, Malaysia	-
Africa					
BOPP POM, Biase Plantation Limited	2014	Adum Bansa	2014	Western Region, Ghana	Certified
		Scheme Smallholder	2014	Western Region, Ghana	Certified
-	-	Treboum Smallholders	2022	Western Region, Ghana	
Biase Plantation Limited	2020	Calaro	2022	Cross River State, Nigeria	Mill construction complete. Delay due to Covid
Biase Plantation Limited	2022	Calaro extension	2022	Cross River State, Nigeria	To be certified, NPP completed
Biase Plantation Limited	2020	Ibiae	2023	Cross River State, Nigeria	To be certified, NPP completed
Eyop Industries	2021	Ibad	2025	Cross River State, Nigeria	To be certified
Eyop Industries	2020	Kwa Falls	2025	Cross River State, Nigeria	To be certified
Eyop Industries	2021	Oban	2025	Cross River State, Nigeria	To be certified
<p><i>Time bound plan Indonesia update Januari 2021, Malaysia update June 2021, Africa update May 2021</i></p> <p>The revision of time bound plan because there is the change of certification time plan to 2022, 2023, and 2025 for some uncertified management units with reason is still in process to get land use right (Hak Guna Usaha) for some unit in Indonesia, pending NPP assessment for some unit in Africa, and delayed certification due to Covid-19 for some unit in Africa and Malaysia.</p> <p>Regarding the TBP more than 2023, Wilmar has communicated about the TBP to RSPO on 16 July 2021. RSPO response about the TBP is RSPO approved on August 2021 the latest TBP with some notes to take into consideration by Wilmar.</p> <p>Furthermore, the revision of time bound plan because some scheme smallholders has paid all costs relate of develop of scheme smallholder areas so that it has excluded from the time bound plan, its are Mekar Lestar Cooperative (PT Bumi Pratama Khjatulistiwa), KUD Damai Sejahtera (DASTRA) I & II (scheme smallholder under PT AMP Plantation and PT Primatama Mulia Jaya), KSU Mutiara Bosa Sikilang, KUD Permata Sawit Maligi, KUD Rantau Pasaman – Sasak and KUD Kapar (its supply based from PT Gersindo Minang Plantations POM)</p>					

	The revision of time bound plan because two companies (PT Karya Agung Megah Utama & PT Perkebunan Anak Negeri Pasaman) has terminated the management agreement with PT AMP Plantation as stated in the termination agreement letter on 31 May 2019.
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard
	Another plasma of PT Agronusa Investama such as Srimaram Cooperative, Pusaka Abadi Nan Jaya Cooperative and Anugrah Semaro Cooperative was included at timebound plan in 2023.

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.3	<ol style="list-style-type: none"> 1. Hasiholan Sihombing (Lead Auditor). Indonesian citizen. Bachelor of Agriculture Majoring in Agronomy, Agriculture Faculty. He has working experienced for 7 (seven) years since 2009 as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The training he has followed namely: Lead Auditor ISPO in 2016, RSPO P&C Lead Auditor Course in 2018, RSPO Supply Chain Certification Lead Auditor Course in 2020, SA 8000 Awareness in 2018, Quality Management Systems (ISO 9001:2015) in 2016, Environmental Management Systems (ISO 14001:2015) in 2017, OHS General Expert in 2013, OHSAS 18001:2007 in 2017, ISO 19011:2018 in 2019, ISO 17021:2011 and ISO 17065:2012 in 2016. During this audit, He assigned to verify legal aspect, land dispute and SCCS. 2. Afiffuddin (Auditor). Indonesian citizen, Diploma III majoring Palm Oil Plantation, Bogor Agricultural University. Five years working experience since 2010 at Oil Palm Plantation Company in Indonesia as agronomy operational staff and followed several trainings namely: Basic Plantation Management Program, Auditor Training Indonesian Sustainable Palm Oil (ISPO), Training of RSPO lead auditor, RSPO SCCS, OHS General Expert, OHS System Management based on PP 50 2012 and Management System Certification (ISO 9001-2015/SNI 19011-9001:2015) ISO 17021, ISO 17065, SA 8000 training. He has been involved in several audit activities related to sustainable palm oil certification since 2016 covering Best Management Practices aspect, health and safety aspect and worker welfare aspect. During this audit, He assigned to verify worker welfare aspect and transparency. 3. Rahmat Abdiansyah (Auditor). Indonesian citizen. Bachelor of Forestry from IPB University, with major in Forest Resources Conservation and Ecotourism. Has experience working in the Indonesian Palm Oil Farmers Organization and Indonesian private oil palm plantation companies. Participate in ISPO and RSPO Internal Auditor training in 2018, ISPO and P&C Certification Systems IHT in 2019, IHT ISO 19011, ISPO Auditor Training in 2020, RSPO Lead Auditor Training in 2020, ISO 14001 and ISO 9001 Lead Auditor Training in 2020, and awareness of the RSPO Certification System and the RSPO P&C in 2019 and 2020. During this assessment, He verified the aspects of environment, conservation and GHG aspect. 4. Sentot Adi Subandono (Auditor). Indonesia citizen, Bachelor of Agriculture, Department of Agricultural Cultivation. He has five years of experience working since 2005 as Plantation Operational Staff and nine years as Internal Auditor in private oil palm plantations in Indonesia. The training that has been attended includes the Basic Management Development Program of Palm Oil Plantation, Use of Limited Pesticides, Best Practices in Internal Auditing, Fraud Auditing: Prevention, Detection, and Investigation, Operational Risk Approach in Internal Auditing, General Occupational Health and Safety Expert, ISPO Auditor Training in 2016, ISO 9001: 2015, RSPO Lead Auditor Training in 2020. During this assessment, He verified the aspects of Best Management Practices and OHS Aspect. <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1.3	<p>Number of auditors: 4 auditors Number of days for ASA-1.3 Onsite Audit: 5 days Number of working days for ASA-1.3 Onsite Audit: 20 Working days</p>
2.2.2	Assessment Process
ASA-1.3	<p>The assessment was conducted by measuring the implementation of certification system and standard conducted by PT Agronusa Investama based on:</p> <ul style="list-style-type: none"> • RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20th April 2020 • RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020 <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the</p>

information; (3) Field observation, aiming to confirm the bigger picture of what was informed by two methods as mentioned before. Some opportunities for improvement of the results ASA 1.3 by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA 1.4. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA 1.3 Audit report.

This audit was carried out with ASI witnesses. The auditor's journey from the airport in Pontianak to the audit location takes about 7-8 hours. The opening meeting was held on Tuesday 9 August 2022 at 08.00 pm in ANI Estate office. As for the participants who attended the opening meeting included the ASI Assessor, ASI Technical Expert, General Estate Manager, Estate Manager, Mill Manager, Support Team from Sustainability Department and other relevant staff Supported Team Jakarta and other staff at PT ANI. While the closing meeting will take place on 13 August 2022 at 08.00 pm in ANI Estate office attended by the same participants as the opening meeting. Management PT ANI accept all this audit results.

Public Stakeholder Notification was made on MUTU Website. There is no written negative feedback receive. 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. A list of Stakeholders contacted is included as Appendix 1.

The assessment program please find Appendix 2.

2.2.3	Locations of Assessment
ASA-1.3	<p>The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>ANI POM</p> <ul style="list-style-type: none"> • Post security. Observation and interview related to OSH, worker welfare, and ethic. • Weighbridge. Observation and interview related to work procedure, OSH, worker welfare, and ethic. • Sortation. Observation and interview related to work procedure, OSH, worker welfare, and ethic. • Dispatch Station. Observation and interview related to work procedure, OSH, worker welfare, and ethic. • WWTP. Field observations related to WWTP entry, runoff, effluent testing. Officers are equipped with PPE and effluent discharge records. • Water Source Reservoir. Observations and interviews related to water management, recording of water use, health checks, PPE and waste management. • Empty bunch area. Field observations related to empty bunch management. • Employee Housing. Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, educational facilities, religious facilities, health facilities and sports facilities. • Sterilizer. Observations and interviews related to technical work, employment aspects, OHS, environment, and social aspects. • Press station. Observations and interviews related to technical work, employment aspects, OHS, environment, and social aspects. • Clarification station. Observations and interviews related to technical work, employment aspects, OHS, environment, and social aspects. • Kernel station. Observations and interviews related to technical work, employment aspects, OHS, environment, and social aspects. • Boiler station. Observations and interviews related to technical work, employment aspects, OHS, environment, and social aspects. • Engine room. Observations and interviews related to technical work, employment aspects, OHS, environment, and social aspects.

- **Hazardous waste temporary warehouse.** Field observations and interview related hazardous waste management, OHS and environmental aspect.
- **Fuel warehouse.** Field observations and interview related chemical management, OHS, and environmental aspect.
- **Chemical warehouse.** Field observations and interview related chemical management, OHS, and environmental aspect.
- **Sparepart warehouse.** Field observations and interview related chemical management, OHS, and environmental aspect.
- **Workshop.** Observations related to the management and implementation of health safety, and social worker.
- **WTP.** Observations related to water management, recording of water used, OHS, and waste management.
- **Hydrant Simulation.** Observation to readiness of emergency team and fire control devices.
- **Mill Drainage.** Observations mill effluent lines, sanitation mill and flow of leaching mill.

ANI Estate (Kumpai)

- **Fertilizer Warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Agrochemicals Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Spare part warehouse.** Observation minimum stock of PPE.
- **Firefighting warehouse and simulation of firefighting equipment.** Observation related to OHS and firefighting facilities and emergency simulations.
- **Clinic.** Observations and interviews of health, environmental, training, and employment facilities.
- **Workshop.** Observations and interviews with officers related to material handling, work procedures, OHS, wages and environmental management.
- **Hazardous Waste Temporary Storage.** Observations and interviews with officers related to work procedures, OHS, wages and environmental management.
- **Pesticide mixing area.** Observation related pesticide mixing area, PPE storage, safety aspect.
- **Rinse House Phase 6.** Observations related to the management of agrochemical materials and waste, MSDS, emergency response facilities and types of pesticides used.
- **Daycare, Phase 6.** Observations and interviews with workers related to labor and OHS aspects.
- **Housing Area Phase 6.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, and electricity facilities.
- **Block 080 (Senapit River).** Observation of HCV management
- **Land Application Block 65/66 A.** Field observations and interviews related to aspects of BMP, OHS, Environment and Employment.
- **Circle path sprayer, Block 264 Division 1.** Observations and interviews related to technical work, employment aspects, OHS, environment, and social aspects.
- **Fertilizer, Block 30J.** Field observations and interviews related to aspects of BMP, OHS, Environment and labour.
- **Harvesting, Block 070 Phase 5.** Observations and interviews related to technical work, employment aspects, OHS, environment, and social aspects.
- **Barn owl box, Block 065.** Observations related IPM.
- **Piezometer block 045B.** Field observations related to the management of peat areas.
- **HGU Pole No. 139.** Observation the conditions and position of legal boundary.
- **HGU Pole No. 140.** Observation the conditions and position of legal boundary.
- **HGU Pole No. 141.** Observation the conditions and position of legal boundary.
- **HGU Pole No. 142.** Observation the conditions and position of legal boundary.

ANI Estate (Senabah)

- **Block 31: HGU Pole No. 194 and 187.** Observation the conditions and position of legal boundary.
- **Block 237: HGU Pole No. 076.** Observation the conditions and position of legal boundary.
- **Block 443: HGU Pole No. 275.** Observation the conditions and position of legal boundary.
- **Clinic.** Observations and interviews of health, environmental, training, and employment facilities.

- **Daycare.** Observations and interviews with workers related to labor and OHS aspects.
- **Housing Complex.** Observation for domestic waste management, OHS, worker facilities
- **Spare part warehouse.** Observations related to the management materials and emergency response facilities.
- **Fuel tank.** Observation and interview related to OSH, worker welfare and waste management
- **Hazardous Waste Temporary Storage.** Observations and interviews with officers related to material handling, work procedures, OHS, wages and environmental management.
- **Oil storage.** Observation related to OSH and hazardous material management
- **Agrochemical central storage.** Observation and interview related to OSH, worker welfare and waste management
- **Rinse house.** Observation for OHS and spraying team facilities
- **Fertilizer warehouse.** Observation of material handling, OHS, and handling of hazardous materials.
- **Workshop.** Observation and interview related to OSH, worker welfare and waste management
- **Fire-fighter equipment and Simulations.** Observation and interview related to emergency response mechanism
- **Generator House.** Observation and interview related to OSH, worker welfare and waste management
- **Block 30 (HCV Area – River Border).** Observation of HCV management.
- **Nursery.** Observations and interviews related to technical work, employment aspects, OHS, environment, and social aspects.
- **Barn owl box, Block 207, Phase 1 Division 1.** Observations related IPM.
- ***Turnera ulmivolia*, Block 207, Phase 1 Division 1.** Observations related IPM.
- ***Antigonon leptosus*, Block 36 A/B.** Observations related IPM.
- **Tapak kuda, Block 26A, Phase 3A.** Observations related land conservation.
- **Replanting, Block 27C, Phase 3A.** Observations and interviews with contractor worker related to technical work, employment aspects, OHS, environment, and social aspects.
- **Harvesting, Block 29 Phase 3A and Block 39 B Phase 4.** Observations and interviews related to technical work, employment aspects, OHS, environment, and social aspects.
- **Circle path sprayer, Block 038 Phase 4.** Observations and interviews related to technical work, employment aspects, OHS, environment, and social aspects.
- **Subsidence pole and piezometer, Block 40A.** Observation related peat management.

Cempaka Biru Cooperative

- **Block 935: HGU Pole No. 001A.** Observation the conditions and position of legal boundary.
- **Block 925: HGU Pole No. 045.** Observation the conditions and position of legal boundary.
- **Harvesting, Block 920.** Field observations and interviews related to technical work, OHS aspects, employment, social, and environment.
- **Fertilization, Block 920.** Field observations and interviews related to technical work, OHS aspects, employment, social, and environment.
- **HCV Area Block 918.** Observation of HCV management

Sentama Lestari Cooperative

- **Block 970D: HGU Pole No. 51 dan 52.** Observation the conditions and position of legal boundary.
- **Block 907D: HGU Pole No. 53 and 55.** Observation the conditions and position of legal boundary.
- **Block 907B: HGU Pole No. 56.** Observation the conditions and position of legal boundary.
- **Block 906: HGU Pole No. 82 and 77.** Observation the conditions and position of legal boundary.
- **Block 971 (HCV Area – Anas River).** Observation of HCV management.
- **Harvesting, Block 907A.** Observations and interviews related to technical work, employment aspects, OHS, environment, and social aspects.
- **Manual upkeep, Block 70.** Observations and interviews related to technical work, employment aspects, OHS, environment, and social aspects.
- **Manuring, Block 907B.** Observations and interviews related to technical work, employment aspects, OHS, environment, and social aspects.
- **Subsidence pole, piezometer, and weirs, Block 907C.** Observation related peat management.
- ***Turnera ulmivolia*, Block 971.** Observation related IPM.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1.3	<p>Summary of stakeholder consultation process for PT Agronusa Investama was held by:</p> <ul style="list-style-type: none"> • Public Notification on website on RSPO and MUTU Website on 25 July 2022 • Public consultation with NGOs (by email) such as WALHI, AMAN, and Sawit Watch on 28 July 2022 • Public consultation meeting with government institution on 09 - 10 August 2022 • Public consultation meeting with communities on 09 - 10 August 2022 • Public consultation meeting with internal stakeholders and contractor on 09 - 10 August 2022 <p>Numbers of input from stakeholders were clarified by PT Agronusa Investama.</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next assessment (ASA-1.4) will be conducted eight (8) months to twelve (12) months date of licensed issued.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Agronusa Investama POM – PT Agronusa Investama subsidiary of Wilmar International Ltd operation consisting of one (1) mill and three (3) oil palm estates.

During the assessment, there were five (5) Nonconformities were assigned against Major Compliance Indicators; five (5) nonconformities were assigned against Minor Compliance Indicators; and three (3) opportunity for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidences e.g. (document record/photographic). Those corrective actions taken that consist of five (5) Major non-conformities and five (5) Minor non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Agronusa Investama POM – PT Agronusa Investama subsidiary of Wilmar International 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 Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.**

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1	The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1	The management documents regulated in the RSPO Principles and Criteria are available to the public including the CSR program and update realization, human rights policy, the routinely mandatory report such as hazardous waste management report; POME report; environmental management & monitoring plan report, planning and assessment of social and environmental impacts and HCV program and update realization. Besides, unit of certification also provided their document publicly accessible by publishing company's policy at their website (e.g: human rights policy) and reporting their mandatory report to related stakeholders (e.g: mandatory manpower report to manpower agency).	
1.1.2	The company can show records of providing information to relevant agencies in the form of routine reports, for example: Plantation Legality <ul style="list-style-type: none"> Plantation progress report (LPUP) of PT Agronusa Investama period of Triwulan I of 2022 has been sent to Plantation Agency of Sambas District on June 2022. PT ANI's investment activity report for the second quarter of 2022 to <i>BKPM</i> (Capital Investment Coordinating Board) on July 14, 2022. Environmental Aspects <ul style="list-style-type: none"> The report on the implementation of the environmental management and monitoring plan for the first semester of 2022 PT Agronusa Investama has been reported to the Department of Public Housing, Residential Areas and the Environment of Sambas Regency on 28 July 2022. The POME management report for Quarter 2 2022 has been reported to the Department of Public Housing, Residential Areas 	

and the Environment of Sambas Regency on July 28, 2022.

- The report on the management of hazardous and toxic waste for the 2nd Quarter of 2022 has been reported to the Department of Public Housing, Residential Areas and the Environment of Sambas Regency on July 28, 2022.
- Quarter 1 2022 POME management report has been reported to the Department of Public Housing, Residential Areas and the Environment of Sambas Regency on 18 April 2022.
- The report on the management of hazardous and toxic waste for the first quarter of 2022 has been reported to the Department of Public Housing, Residential Areas and the Environment of Sambas Regency on April 18, 2022.

OHS Aspects

- OHS Committee - Quarterly Report 4, 2021 was reported to *Dinas Tenaga Kerja dan Transmigrasi* (the Manpower Office) of Sambas District on Februari 22, 2022.
- OHS Committee - Quarterly Report 1, 2022 was reported to *Dinas Tenaga Kerja dan Transmigrasi* (the Manpower Office) of Sambas District on May 10, 2022.
- OHS Committee - Quarterly Report 2, 2022 was reported to *Dinas Tenaga Kerja dan Transmigrasi* (the Manpower Office) of Sambas District on July 27, 2022.

Based on the results of a document review and interviews with management representatives regarding how to access information in the company, it is known that legally accessible documents are available to the public in the estate and mill offices. The company also has a mechanism for Providing Information to Outside Parties, which, among other things, explains that the company will respond to requests for information no later than 14 days after the request is received.

1.1.3

Based on the results of a document review, interviews with representatives of the *Serikat Pekerja Pejuang Lintas Khatulistiwa* (PELIKHA) and the *Serikat Buruh Kerakyatan* (SERBUK) and interviews with management, the following evidence was found:

- Based on the results of interviews with the PELIKHA and SERBUK Worker Union, it was stated that the Workers' Union had sent a letter requesting the holding of Collective Labour Agreement (CLA) negotiations on April 1, 2022, because the CLA will expire on September 30, 2022.
- Letter from PELIKHA No. 01/SP-PELIKHA/PUK/IV/2022 dated 01 April 2022 and Letter from the SERBUK Worker Union No. 001/SBK-SBS/IV/2022, dated 01 April 2022, regarding the Request for the Holding of CLA Negotiations between POM – PT ANI 3 Kumpai and PUK PELIKHA Worker Union PT ANI 3 Kumpai and SERBUK POM ANI III Kumpai.
- Letter from PT Agronusa Investama, number 266/ANI-EXT/VIII/2022, dated 11 August 2022, regarding PT Agronusa Investama PKS's request for PT Agronusa Investama PKS negotiations, which stated that they are willing to carry out negotiations starting on 15 September 2022. The letter was received by SERBUK and PELIKHA parties on 12 August 2022.
- Procedure for Providing Information to Outside Parties (Transparency), document number SOP 52/WIP-KB/(02)/0911, Revision 2, effective date 01 October 2015, which among other things states that "The Company will respond to requests at the latest within 14 days after the request is received.
- Based on the explanation above, it is known that the response to incoming letters from the PELIKHA and SERBUK unions by the company is 134 days.

Based on the explanation above, it is known that there are responses to stakeholders beyond the timeframe in responding to requests for information that have been stipulated in company procedures. This becomes **Non conformity No. 2022.01 with major category**.

1.1.4

PT ANI Sambas has developed a procedure for implementing communication and consultation with stakeholders in the SOP for Management / Handling of Complaints and Complaints (SOP No. 60 / WIP-KB / (01) / 0915, Revision 02 dated January 6, 2021). Procedures describe methods of consultation and communication with stakeholders through socialization of policies or procedures in writing or displaying pictures for those who cannot read and write. The purpose of this procedure is to facilitate effective communication, ensuring the distribution of information in appropriate languages and forms to enable effective participation in decision-making with relevant stakeholders.

Based on the results of interviews with contractor representatives, it is known that the company has provided socialization regarding sustainability policies and other procedures including regarding handling of complaints determined by the company by gathering contractors and given socialization.

Based on the results of interviews with village community representatives, for example Beringin Village and Semanga Jaya Village, it is known that the village knows how to contact the person in charge, where communication can be done by telephone or by communicating directly by coming to the office.

1.1.5

There is an up-to-date list of contacts and detailed information on stakeholders and their appointed representatives, which are listed in the 2022 Stakeholder List document, which are as follows:

- Kalimantan Barat Provincial Government: 7 stakeholders
- Sambas Regency Government: 9 stakeholders
- Sambas District Heads: 2 stakeholders
- Village Heads Around the Company: 4 stakeholders
- Community leaders & village officials: 3 stakeholders
- Sambas Police :1 stakeholder
- Polsek: 2 stakeholders
- Pospol: 1 stakeholder
- NGO: 2 stakeholders
- Contractors: 4 stakeholders
- Hospitals & Health facilities: 6 stakeholders

Based on the verification results by contacting the listed stakeholders randomly, it is known that the contacts listed are still relevant. For example, the stakeholders contacted were Beringin Village, CV Berkas Mandiri Sentosa, Semanga Jaya Village and PT Harman Bangun Persada.

1.1.3	Status: Non conformity No. 2022.01 with major category
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1.2

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

1.2.1

There are policies to act ethically which are listed in Company Policy - Company Code of Ethics, Version 5: June 2019. These policies include, among others, stating three main principles, namely avoiding conflicts of interest, avoiding abuse of position/authority and to ensure the confidentiality of information and prevent misuse of information obtained through the company's operational activities for personal or other purposes other than corporate interests.

The implementation of these policies is stated in the cooperation contract with the contractor. For example, those listed in the FFB Palm Oil Sales and Purchase Cooperation Agreement, number 001/SPK-ANI Kumpail/PB-TBS/II/2022 between the company and CV Berkas Mandiri Sentosa, dated January 2, 2022 and signed by the Director. In article 10 related to Ethics / Norms for Implementing Agreements, among others, explains that the first party (CV Berkas Mandiri Sentosa) does not offer, promise and/or give gifts in the form of money or goods to employees of the second party (PT ANI) for any purpose and will not persuade, inviting or forcing PT ANI employees to work together to take actions that are detrimental to PT ANI in the FFB sale and purchase transaction between the parties.

1.2.2

Monitoring of unit certification code of conduct pursuant to internal and external stakeholders (included contractors) was conducted through several methods, such as internal audit and field monitoring.

Every local contractor has received a socialization regarding the policy of the code of ethics given at the time of signing the agreement. The system for monitoring compliance and implementation of the policy already listed in the procedure.

Based on the results of interviews with mill and estate workers, it is known that the workers have understood the ethical policies owned by the company. The worker explained that it is not permissible to take actions that violate the company's code of ethics, for example committing crimes, gambling, domestic violence, bribery and so on. Workers are also aware of the reporting mechanism if there are violations of the code of ethics committed by workers.

The monitoring system for compliance with the ethics policy is carried out through monitoring complaints. The company has a complaint procedure for submitting complaints including complaints of violations of the code of ethics. In addition, the company also

routinely evaluates contractor performance which includes aspects of the RSPO including ethical behavior. Based on the results of the review of the contractor's performance evaluation document, it was found that there was no indication of a violation of ethical behavior.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

2.1

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

2.1.1

The company has list of regulations of 2022 that includes local regulations and national regulation updated annually. List of laws/regulations listed has covers several aspects such as land permit and legality, manpower, occupational health and safety, best management practices and environment. Some examples of regulations compliance that have been done such as:

Land legality

- Unit of certification has **location permit** as presented in document Decree of Sambas Regent No. 46 TAHUN 2006 dated 14 March 2006 for area covers 12,500 ha and has revised through Decree of Sambas Regent No. 269 TAHUN 2009 dated 30 June 2009 for area covers **12,440 ha**.
- Unit of certification has business permit for oil palm plantation as presented in Sambas Regent Decree No. 372 TAHUN 2008 dated 19 December 2008 about **Plantation Business Permit (IUP)** for oil palm plantation activities with area covers **12,500 ha** and its processing mill with capacity **60-ton FFB/hour**.

Environmental Aspects

- Environmental permit for AMDAL document with No. 660.1/887/Bapedalda-A dated 10 June 2008 and UKL/UPL Number 11 / BLH / 2016 dated 26 January 2016.
- The company has a permit for hazardous and toxic waste management for the storage of hazardous and toxic materials by PT Agronusa Investama (Ani Estate) with Number 217/PRKPLH/2018 according to the Decree of the Regent of Sambas on April 2, 2018 with a validity period of 5 years. (Kumpai and Senabah Estates)
- The company has a permit for hazardous and toxic waste management for storage activities for hazardous and toxic materials by PT Agronusa Investama (Ani POM) with Number 216/PRKPLH/2018 according to the Decree of the Regent of Sambas on 2 April 2018 with a validity period of 5 years.
- The company already has a water resource exploitation permit for PT Agronusa Investama in Sambas Regency, Kalimantan Barat Province with Number 503/05/SDA/DPMPSTSP-C.1/2021 in accordance with the Decree of the Head of the Investment and One-Stop Service Office of Kalimantan Barat Province on date 17 May 2021 with a validity period of 5 years.
- Permit to dispose of liquid waste for Land Application activities is in accordance with the statement of fulfilling the commitment number: 503/453 / DPMPSTSP-3 dated 12 December 2019 and proof of license activation in the OSS system with NIB 8120201931794 print date of 12 December 2019 with a validity period of 5 years.

Best Management Practices

Based on field observations at Senabah Estate, Kumpai Estate, Sentama Lestari Cooperative, and Cempaka Biru Cooperatives, as well as interviews with workers, it is known that plantation and mill management has implemented some compliance with Indonesian laws and regulations. These revealed that The CH has carried out replanting without burning, has not replanted in river border areas, has implemented soil conservation in undulating areas by making terraces, and planted using certified seeds. The results of the interview revealed that The CH did not use paraquat in weed control, but used herbicides registered with the Director General of Fertilizers and Pesticides.

OHS Aspect

- The company has carried out routine checks on its machines. For example, testing of Avery Weigh-Tronix scales with serial numbers 150450548 with a capacity of 40,000 Kg and 190250030 with a capacity of 50,000 Kg was carried out by the technical implementation unit for the legal meterology area of the Office of Cooperatives, Small, Medium Enterprises, Industry and Trade of Sambas Regency with the results being approved for the anniversary calibration. 2021 and re-calibrate no later than October 12, 2022.

- Certificate number 060/Ket-GS/SER/PTP/VIII/2022 dated August 08, 2022 from PT Global Safety has been shown which explains 1 Engine Room operator will carry out power house training in September 2022.
- It has been shown that the results of the assessment of 1 generator set operator with the recommendation that the results of the PJK3 (OHS Company services) assessment meet competence. However, the certificate of competence is in the process of being issued.

The company has the opportunity to ensure the issuance of the OHS license for engine room operator and the standard license for electrical power engineering (OFI).

Manpower Aspect

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

- Reporting of Labor Report via online.
- The implementation of the minimum wage in 2022 is in accordance with the Minimum Wage Decree of Sambas Regency
- Payment of overtime wages to workers in accordance with Decree of the Minister of Manpower No. 102 of 2004.
- Implementation of the structure and scale of wages for all levels of workers in accordance with Minister of Manpower Regulation No. 01 of 2017.

2.1.2

Procedure of legal requirement which presented in document SOP02/WIP-KB/(02)/1015, revision 02, dated 1 October 2015 mentioned that Legal Officer has responsibility to arranged and monitored legal related laws and/or regulation. The procedure mentioned that in order to monitor and update of laws and/or regulations, the Legal Officer required to actively check and make coordination with Government Agencies or Institutions. The company have shown list of updated regulation related to the field of worker welfare aspect, for example Government regulations No. 35 of 2021 concerning Specific Time Work Agreements, outsourcing, working hours, rest periods, and layoffs. Internal audit of regulations compliance is conducted annually as example on 14-15 July 2022. Regarding the evidence of evaluation of legal compliance from contractors collaborating with the company, is explained in more detail in indicator 2.2.2

2.1.3

Procedure of legal boundary stakes monitoring and maintenance is presented in document No. 001/SOP/GIS/2014, dated 1 July 2014. Procedure mentioned that maintenance was carried out by officer appointed by Surveyor and Estate. Monitoring the boundaries of the HGU is done every 3 months.

The company shows the HGU stake monitoring document which is carried out every 3 months. The last HGU stake monitoring was carried out in June 2022 at ANI Estate. The report on the inspection and maintenance of the boundary stakes has provided complete information regarding the number of stakes, the state of the stakes, the location of the stakes, the coordinates of the stakes and corrective actions as well as the target time for repairs if there are damaged or missing stakes. In the monitoring report, it is known that all HGU stakes are available.

Based on field observations to several samples of HGU stakes determined by the auditors, namely ANI Estate Senabah (Stakes No. 194, 187, 076, and 275), Sentama Lestari Cooperative (Stakes No. 51, 52, 53, 55, 56, 77 and 82), Cempaka Biru Cooperative (Stakes No. 001A and 045), it is concluded that all HGU stakes are in place according to their coordinates and are in good condition. Land boundaries with outsiders are clear, such as a large boundary road and trench that borders the HGU area. There is no indication of land use outside the HGU.

Status: Comply

2.2

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

2.2.1

A list of contractors is available which is also listed in the Stakeholder List 2022 document. The document informs that there are 6

contractors complete with information on the contractor's name, contact name, address and contact number, for example CV Multi Indah Lestari.

2.2.2

All contracts, including contracts with FFB suppliers, have separate clauses regarding the fulfilment of relevant legal obligations, for example Work Agreement Letter No. 001A/POM/ANIK-HBP/C/05/22, dated 9 May 2022, between the company and PT Harman Bangun Persada for construction of a G10 type house. Separate clauses regarding the fulfilment of relevant legal obligations are listed in article 12 and article 14.

Third parties can prove that the fulfilment of legal obligations has been carried out in accordance with the contract clauses. For example, PT Harman Bangun Persada can show proof of payslips, for example in the name of contractor workers LZ (initials) for the salary period 30 May - 6 August 2022, where the wages paid are above the applicable minimum wage.

Based on the results of a document review and interviews with contractor representatives, it is also known that contractor workers have been covered by insurance in the BPJS program. This is proven by showing CV Golder Citra Perkasa's receipt of BPJS Ketenagakerjaan contributions for payment of contributions in August 2022. Contractor CV Indah Lestari also explained that workers have been registered with BPJS Employment and Health and have been provided with appropriate PPE for their work. Likewise compliance with environmental aspects, where in the clause of the agreement, among others, it states that the contractor must protect the environment, including in terms of zero burning.

2.2.3

All contracts, including contracts with FFB suppliers, have separate clauses that prohibit practices involving child labor, forced labor, and workers from human trafficking, for example stated in the Cooperation Agreement for the Sale and Purchase of Oil Palm Fresh Fruit Bunches, No. 001/SPK-ANI Kumpai/PB-TBS/II/2022, between the company and CV Berkat Mandiri Sentosa, January 2, 2022. A separate clause which prohibits practices involving child labor, forced labor, and workers from human trafficking is contained in article 10.

Based on the results of field observations, interviews with workers, interviews with contractors and interviews with the manpower office, it is known that there are no issues related to child labour, forced labor and workers from human trafficking.

Status: Comply

2.3

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

2.3.1

Based on document verification, it is known that the company receives FFB directly from the nucleus estates and partnerships. The source of FFB comes from:

- ANI Estate → Certified RSPO
- Koperasi Sentama Lestari → Certified RSPO
- Koperasi Cempaka Biru → Certified RSPO.
- Serimaram (Non-Certified RSPO) → Group Wilmar
- Plasma Serimaram (Non-Certified RSPO) → Group Wilmar
- Koperasi Anugrah Semaro (Non-Certified RSPO) → Under Controlled Group Wilmar
- Koperasi Pusaka Abadi Nan Jaya (Non-Certified RSPO) → Under Controlled Group Wilmar
- PT Buluh Cawang Plantation (Non-Certified RSPO) → Group Wilmar
- Plasma Buluh Cawang Plantation (Non-Certified RSPO) → Group Wilmar

2.3.2

Based on document verification, it is known that the company receives FFB indirectly from several sources. Companies can show a list of FFB suppliers indirectly, for example:

- CV BMS (Non certified RSPO) with a total of 41 Farmers and 1 Mekar Sari Cooperative with an area of 536.3 Ha with land legality in the form of SHM and SKT and there are information coordinate points for example farmers (MW).
- CV GCP (Non-Certified RSPO) with a total of 75 farmers with an area of 119.72 hectares with land legality in the form of SHM and SKT and there are information coordinate points for example farmers (RB).

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	
<p>The CH has compiled a work plan in the Projections from 2021 – 2025 document. This covering estimated replanting area; mature area; FFB production from own estate, own group, plasma, and outside; Mill capacity; throughout; utilization; CPO and PK production; FFB sales; plantation development; mature maintenance; milling; Capital Expenditure; and so on. For independent small holders, the company through the trading department always confirms their FFB, which of course refers to the company's projections.</p>	
3.1.2	
<p>The CH shows a program of replanting per year projected for at least the next five years, which is listed in the 2020 – 2028 Replanting Plan document. For example, in 2023, replanting is planned in Block 008, with a planting year of 2000, and an area of 62.81 ha, with no peat identification. The results of the field visit at Block 27 C phase 3A revealed that replanting had been carried out according to the plan, with treatment without burning, using heavy equipment for chipping. This has been reviewed regularly in the periodic management review.</p>	
3.1.3	
<p>The CH has conducted periodic management reviews. The year 2022 is indicated in the Management Review Minutes on 18 February 2022, which was attended by AGM, FM, MM, and related staff. Aims as a review of operational activities in the current year and the previous year. The discussion agenda includes internal audit results, customer input, performance and fulfillment of product requirements, status corrections, follow-up on previous management review recommendations, change of area statement, replanting, production, and recommendations for improvements.</p>	
<p>The CH has conducted periodic financial audits. The report on the results of the financial audit for the financial year December 31, 2021 Number 00663/2.1032/AU.1/01/0692-1/1/IV/2022 dated April 19, 2022 conducted by the Public Accounting Firm with an opinion presented fairly in all matters material.</p>	
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	
<p>The company has carried out regular SDC (System Development Control) Internal Audits and RSPO Internal Audits. As an example, it has also shown the RSPO Internal Audit which was carried out on 07 - 12 June 2021. The findings of the RSPO Internal Audit, there were 12 discrepancies with closed status / corrections had been carried out.</p>	
<p>The management unit has developed and implemented an action plan for continuous improvement, and it is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification, such as:</p>	
<ul style="list-style-type: none"> • 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 fuels and the use of fertilizers and pesticides are in accordance with the recommendations to reduce the use of fossil fuels. • Waste management and monitoring through WWTP Management, testing the quality of the effluent and reporting it to the Sambas Regency Environmental Service. • Air quality management and monitoring through road maintenance, air quality testing and reporting to the Sambas Regency Environmental Service. • Management and monitoring of groundwater through Testing the quality of groundwater and reporting it to the Environment of 	

Sambas Regency.

- Hazardous waste management through Hazardous and Toxic Waste Storage and Hazardous and Toxic Waste management and monitoring.
- Greenhouse Gas (GHG) Management. Implement a zero-burning policy, utilization of EFB, shells and fiber as renewable energy, regular engine maintenance, and regular emission quality tests.

3.2.2

The company already has an annual report document using the RSPO metric template format version 2.1 with Period Annual data (Januari-Desember 2021) and 12 Month period counting up to two months before audit month (July 2021 – June 2022) which was provided to the auditor team at the time of the assessment. The summary in the report, for example, is as follows:

- Name of RSPO Member: Wilmar International Limited
- RSPO Membership Number: 2-0017-05-000-00
- Name of Certified Audit: PT Agronusa Investama
- Name of Certification Body: PT Mutu Agung Lestari
- RSPO Palm Trace ID Number: RSPO_PO1000002130
- Number of Mill: 1
- Number of Certified Estate: 3
- HCV Area: 58,19 Ha.

Based on the verification of the RSPO Metric Template auditor team provided by the company in accordance with supporting data (actual conditions) such as HCV, Production, CSPO and CSPK Productions as well as sales, Worker Demographic, etc.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The CH has SOPs and work instructions for all plantation activities. The Standard Procedure (SOP) for oil palm cultivation is contained in the 2015 Palm Oil Agronomy and SOP Handbook document which has been approved by the Group Head of Plantation. SOP is available in Indonesian, there are approximately 12 chapters related to BMP, including survey and land clearing, nurseries, planting and maintenance of LCC, insertion of care and maintenance of immature and mature as manual maintenance and manuring, harvesting, plant protection (Integrated Pest Management), replanting, Empty Fruit Bunch mulching, and thinning out.

The CH has procedures related to palm oil processing contained in the factory SOP documents. Which includes among others receiving FFB, receiving outside FFB, weighing operations, sorting stations, loading ramp stations, kernel stations, purifier machines, steam turbines, boilers, clarification stations, decanter machines, water treatment plants, boiler ash cleaning, continuous sterilizer system and logistics (CPO and PK dispatch).

Based on field observations at the harvesting activities of ANI Estate - Senabah, in Block 29 Phase 3A and Block 39 B Phase 4, it is known that the harvesting activities are in accordance with the procedures owned by the company. Likewise, the results of field visits in the Mill sorting area, it is known that the sorting has been carried out according to the procedure.

3.3.2 and 3.3.3

The CH already has a system that ensures the consistency of SOP implementation in procedure of annual internal audit is presented in document No. SOP 23/EHS-ANI/(02)/0621 (Rev. 02) dated 01 June 2021 about internal audit. For example, the progress of PICA (Problem Identification Corrective Action) from the previous audit in ANI POM dated November 16, 2021 has been shown. The document contains, among others, the department, problem identification, corrective action, due date, PIC, documentation before, status of findings, documentation after. It is known that there are 57 findings with closed status. For the audit in the plantation, the PICA (Problem Identification Corrective Action) document was shown, implemented in semester 1 of 2021. The results of the document review revealed 17 findings, and have been closed. In 2022, the System Development Control Audit will not be carried out again until the RSPO audit is carried out. Through the contractor evaluation mechanism. As an example, it has been shown by The CH, Contractor Evaluation of PT Harman Bangun Persada for the construction of the Mess on 25 April 2022, with sufficient assessment results. Based on this, it is known that The CH has maintained the results of its internal control and corrective actions.

The results of field observations of replanting activities carried out by contractors at Block 27 C Phase 3A Estate Senabah, it is known

that the Excavator Operator has an OHS license. The results of the interviews also revealed that the company had submitted a ban on burning and dumping used oil on land. Based on the observation results, it is known that there are no traces of burning, oil disposal, and the contractor workers have used the appropriate PPE. This means supervision from the company to ensure replanting according to procedures has been carried out.

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

There is no development of new areas carried out by the management unit, up to ASA-1.3 the scope of certification is still the same as recertification activities and all areas have been included in the social & environmental impact assessment documents they have.

3.4.2

The company has carried out an independent and participatory environmental and social impact assessment by involving the stakeholders listed in several documents, namely:

Environmental Aspect

Ani Estate

An Environmental Impact Assessment (AMDAL) document is available which is approved by the central AMDAL Commission An. Minister of Forestry No. 635/Menhut-II/2001 dated 01 May 2001. The AMDAL obtained the following information:

- The area of the AMDAL is 15,000 Ha and the Factory Capacity is 60 Tons of FFB/Hour.
- The scope of AMDAL activities is Palm Oil Plantations and Mills, including construction of facilities and infrastructure for roads, bridges, drainage/trenchments, waste management, conservation of soil, water, air and animals, and control of plant pests.
- PT Bantanan Eka Jaya took over to Wilmar International Plantation in 2004 from the Sinar Mas business group under the name PT Agronusa Investama. Referring to the Letter of the Head of Bapedalda a/n the Governor of Kalimantan Barat No. 660.1/887/Bapedalda-A dated June 10, 2008, point 1 state that ANI Sambas does not need to conduct a new AMDAL study to conduct environmental management and monitoring, for this PT ANI Sambas needs to make a statement of commitment to all obligations stipulated in the AMDAL document, RKL and the RPL of PT Bantanan Eka Jaya.

Ani POM

Ani POM has the UKL-UPL document which has received approval from the Sambas Regency Environmental Agency with No 660.1/20/BLH-A dated January 20 2016 besides that the UKL-UPL document has received an environmental permit in accordance with the decision of the Head of the Sambas Regency Environmental Agency Number 11/BLH/2016 dated 20 January 2020 for the construction of a palm oil mill by PT Agronusa Investama in Senabah Village, Sejangkung District with a capacity of 60 tons of FFB/hour.

Social Aspect

The company has a Social Impact Analysis Report document for the scope of the Palm Oil Plantation & Mill. The assessment process was carried out in March 2011 by The Indonesian Resource Institute. The document describes the management of the social impacts of plantations and mills, including: employment, occupational health and safety, worker facilities and benefits, consultation and communication, job stability, business opportunities, income, household income, institutions, perceptions in the company, socio-cultural changes, health and community workers, and tenure. The data collection process is carried out through discussions with stakeholders, employees and the community. The results of the discussion are described in the form of Minutes of the results of the discussion. Evidence in the form of a recording of the List of Discussion Participants at the time of information collection. The parties involved include employees and the surrounding village community (Semanga, Beringin and Sentai) which are attached to the report. In September 2018 a Review of the Social Impact Monitoring Plan of PT Agronusa Investama was carried out. The document contains a description of, among others; Source of impact, measured parameters, Monitoring Objectives, Data collection and analysis method, monitoring location, Implementer and review results.

Based on document verification, field observations, and interviews, the following evidence was obtained:

Environmental Impact Assessment

- The company has an Environmental Impact Analysis Document (AMDAL) conducted in December 2000 with a Study Area of

±15,000 Ha and a Factory Capacity of 60 Tons FFB/Hour. The activities studied are:

- Activities in the Pre-Construction stage include the Land Acquisition Process.
- Construction phase activities include land clearing, logging, construction of roads and employee houses, construction of terraces and drainage canals, nurseries, piling and making planting holes and planting.
- Post-construction activities include plant maintenance, fertilization, pest and weed control, FFB harvesting, FFB transportation and oil palm processing in the PKS.
- The results of field observations at Block 27 Phase 3A of the Senabah unit are known that in 2021 and 2022 the company has carried out replanting. In addition, based on the results of the document review, it is also known that the company has carried out replanting activities from 2019-2021.
- However, the company has not yet been able to demonstrate an environmental impact assessment of the replanting activities.

Social Impact Assessment

- The company has conducted a social impact assessment in March 2011 conducted by The Indonesian Resource Institute. In this document it is known that there has not been an assessment of the social impact of the replanting activity.
- The results of field observations in Block 27 Phase 3A of the Senabah unit show that in 2021 and 2022 the company has carried out replanting. In addition, based on the results of the document review, it is also known that the company has carried out replanting activities starting in 2019-2021.
- However, the company has not been able to show a social impact assessment from replanting activities.

Social Management and Monitoring Plan

- The company already has an SIA management plan for 2021-2022 which was developed with the participation of stakeholders such as the people of Semanga Village, Sepantai Village, Sabung Village, and Beringin Village, Plasma Cooperative Management, Employees, and Trade Unions whose data was collected on 8-22 July 2021 with interviews and FGDs. The SIA management plan includes:
 1. Handling Mill Waste and River Pollution by Pesticides
 2. Consultation and communication
 3. CSR
 4. Land conflicts
 5. Employment Recruitment
 6. Work Facilities (no harvest points, water motorbike costs, work job desks, and class status)
 7. Plasma
 8. OHS
- Based on the results of interviews with workers and community representatives from Semanga and Beringin Villages as well as field observations, it is known that there are currently developing social issues and these issues have not been covered in the SIA management plan for the period 2021-2022 such as the issue of replanting, complaint mechanisms, and worker facilities related to housing and housing conditions (drainage channels).
- The results of interviews with company representatives found that in preparing the SIA management plan the company involved community representatives, representatives of Plasma Smallholders, and representatives of employees who were considered to be key stakeholders. However, based on the results of interviews with representatives of the Semanga Village community who were not involved in preparing the SIA plan, it is known that there are villagers who have asked questions regarding replanting activities carried out by the company while the company's HGU has not yet been issued. This issue has also been published in online news.

Based on the evidence, the following conclusions are obtained:

Social and Environmental Impact Assessment

The company has not been able to show an environmental and social impact assessment of the replanting activities that have been carried out.

Social Impact Management Plan

- The company has not been able to show that its social impact management and monitoring plan has covered all developing social issues
- The preparation of a social impact management plan that is carried out in a participatory manner does not represent all affected stakeholders.

This becomes Non conformity No. 2022.02 with Minor Category

3.4.3

The Company has implemented environmental and social management and monitoring plans, namely:

Environmental Aspect

The company has implemented an environmental management and monitoring plan for the first semester of 2022. The environmental management and monitoring plan is in accordance with its environmental documents. The results of the verification of the implementation of the environmental management and monitoring plan for the first semester of 2022 are in accordance with the directions of the environmental documents owned. In general, the results of environmental management and monitoring are in accordance with the provisions. The company has also conducted evaluations such as trend evaluation, critical level evaluation, and compliance evaluation. Based on the results of interviews with the surrounding community, information was also obtained that there was no environmental pollution by the company. In addition, the results of the interview with the Sambas Regency Environmental Office also explained that the company had carried out environmental management and monitoring and reported the results of the implementation of environmental management and monitoring to the Environment Agency.

Social Aspect

Based on document verification, field observations and interviews, the following evidence was obtained:

- The company already has an SIA management plan for 2021-2022 which was developed with the participation of stakeholders such as the people of Semanga Village, Sepantai Village, Sabung Village, and Beringin Village, Plasma Cooperative Management, Employees, and Trade Unions whose data was collected on 8-22 July 2021 with interviews and FGDs. The SIA management plan includes:
 1. Handling Mill Waste and River Pollution by Pesticides
 2. Consultation and communication
 3. CSR
 4. Land conflicts
 5. Employment Recruitment
 6. Work Facilities (no harvest points, water motorbike costs, work job desks, and class status)
 7. Plasma
 8. OHS
- The company has implemented a social impact management plan, including:
 1. Handling Mill Waste and Pollution of rivers by pesticides by testing liquid waste, carrying out chemical activities according to SOPs, not carrying out chemical activities in riparian areas.
 2. Consultation and communication regarding FFB prices by socializing FFB pricing to FFB suppliers (vendors). Socialization has not been carried out for independent farmers.
 3. CSR by compiling a CSR program.
 4. Occupational Safety and Health by providing PPE and Safety Patrol.
- From the results of social impact management carried out, the company has not been able to show the results of its monitoring to evaluate the effectiveness of the management activities carried out.
- The results of field observations and interviews with the auditor team with village communities and company employees found that the implementation of social impact management has not been able to mitigate developing social issues, namely:
 1. The results of field observations in the HCV area Block 918 of the Cempaka Biru Cooperative note that there are traces of pesticide application on the riverbank which is an HCV area.
 2. The results of interviews with representatives of the Semanga Village community revealed that there were social issues related to differences in FFB pricing between suppliers set by the company.
 3. The results of interviews with representatives of the Semanga Village community stated that the community did not know about the company's CSR program and instead questioned PT ANI's CSR.

Based on this evidence, the Company has not been able to show evidence of social impact management that has been carried out and has been monitored to be able to prove that the management carried out can mitigate developing social issues. **Non conformity No. 2022.03 with Major Category.**

3.4.2	Status: Non conformity No. 2022.02 with Minor Category.	
3.4.3	Status: Non conformity No. 2022.03 with Major Category.	

3.5

A system for managing human resources is in place.

3.5.1

The certification unit has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the CLA. In addition to being publicly listed in CLA, the certification unit has other procedures in the form of Policies, SOP, Internal Memorandums and others related to recruitment, transfer, promotion, retirement, termination of employment and others. These procedures have been documented to all workers and their representatives, for example, some procedures that are owned by the company include SOP Recruitment, Employee Pension, SOP Promotion and SOP Worker Assessment.

The company explicitly states a policy of non-discrimination during the recruitment, hiring and promotion selection process, which is stated in the policy on equal opportunities published in January 2018. The policy recognizes that everyone has the right, regardless of ethnicity, religion, race and class, to get employment opportunities.

Procedures are in accordance with relevant regulations, such as hiring employees who are not under the age of 18.

The certification unit did not have workers with contract status for daily worker (BHL), the current employee status is permanent workers who have Orientation Worker status (3 month orientation period), such as Daily Regular Workers, Monthly Regular Workers and Staff. All the rights for each employment status has been distinguished.

Based on the explanation above, it is known that the certification unit has well-documented procedures for recruitment, selection, employment, promotion, retirement and termination of employment.

3.5.2

Employment procedures are carried out and records are maintained, some of which are shown as follows:

- Decree No. 001/ANI-HRR/SK/II/2022 concerning Recruitment of Employees on behalf of Ir (initials), January 3, 2022. The document, among other things, explains that the person concerned has participated in the selection process for prospective employees.
- Decree No. 067/ANI-HRR/SK/III/2022 concerning Permanent Employees in the name of Ir (initials), dated March 18, 2022. The document, among other things, explains that the person concerned is assigned the position of Foreman Electrician with class 2C.
- Decree No. 030/ANI-HRR/SK/II/2021 concerning Promotion of Employees in the name of Ja (initials), January 2, 2021. The document, among other things, explains that the person concerned is promoted from class 2B to class 2C.

Status: Comply

3.6

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

3.6.1

The CH has carried out hazard identification, risk assessment, and risk control at both the Mill and estate. For the Mill, it was approved in January 2022, which contains stations/areas, job descriptions, hazards, consequences, initial risks, controls, and final risks. Based on the document review and field observations, it is known that all activities at the Mill have been carried out by HIRADC.

Based on review of the HIRADC Estate documents (updated 03 January 2022) and field observations at the Estates, it is known that there are activities whose hazard risk analysis has not been identified, such as:

- Pick bugworm
- Beneficial plant maintenance
- HGU boundaries peg inspection
- HCV conservation
- Nursery area
- Piezometer inspection, subsidence pole and weirs
- Subsidence pole, piezometer, and weirs maintenance

Based on review of the Identification of SHE Aspects and Impact documents and field observations at the POM, it is known that there are activities whose hazard risk analysis has not been identified, such as activities in the water intake area, where there is a potential hazard for activities related to electricity, water pumps and activities at risk of drowning.

SOP 27/WIP-KB/(01)/0421 concerning HIRADC which has been approved by the Kalimantan Barat Plantation Head, effective April 2021, it is known that in point 6.5 it states that all potential that may arise as a result of work activities/product activities of goods and services must be registered in hazard identification. Hazard identification is not limited in terms of potential to activities that occur in the unit, but can be motivated by events in other relevant places.

Based on this, it is known that not all operating activities at PT ANI have been assessed for risk to identify OHS problems according to the procedures they have. This becomes **Non conformity No. 2022.04 with Major category**.

3.6.2

The CH has an OHS Committee in each unit which is responsible for the implementation of OHS aspects. One of the activities of the OHS Committee is to conduct monthly evaluations related to the implementation of OHS programs. For example, in the OHS meeting on 27 May 2022, they discussed about Action Plan and OHS program. In the OHS meeting on 08 July 2022, they discussed about Internal audit OHS System Management.

The CH already has an OHS program. For example, in the second quarter of 2022, a hot work socialization program is planned, which will be realized on May 16 2022 at the Mill with 20 participants.

Based on this, it is known that The CH has maintained records monitoring the effectiveness of the OHS plan to manage risks to people.

3.6.1	Status: Non conformity No. 2022.04 with major category
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3.7

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

3.7.1 & 3.7.2

Certification unit has training identification and program for workers for period of 2022 for operational training, OHS training and policy socialization. The aspect in the training program is such as environment, labor best management practice aspect and others. Some of training program, namely:

- Training for manuring, harvesting and spraying activity
- Socialization of company's policy such as human right, no child worker and sustainability policy
- First aid training.
- Training for Environment and hazardous waste handling.
- Simulation of emergency responses and firefighting management

In addition, the certification unit has an identification and training program for relevant stakeholders (contractors, local communities and smallholders). These programs include the following:

- Socialization of company policies such as code of conduct, human rights, no child worker and others.
- Training for best practices to smallholders.
- Training for OHS and PPE.

The certification unit has properly documented every training activity and socialization that has been carried out to workers and related stakeholders. The following is an example of training/ socialization documentation that has been carried out during 2022, namely:

- Minutes of training/socialization of Working At Height to shift A process, 29 July 2022, which was attended by 24 participants.
- Minutes of training/socialization of Working At Height to shift A process, 15 July 2022, which was attended by 17 participants.
- Fire emergency response simulation training for employees, for example on 4 February 2022 and 28 March 2022 which was attended by the Estate and Mill Fire Task Force.
- Training records related to MSDS and pesticide handling to Sentama Lestari and Cempaka Biru plasma workers, on July 16 2022

Based on the results of field observations and interviews with workers such as warehouse officers regarding pesticide handling, interviews with herbicide applicators regarding safe working practices and workers in workshops related to handling oil waste, it was found that the interviewed workers understood aspects related to their respective jobs.

Based on the results of interviews with contractor representatives (such as CV Multi Indah Lestari, CV Pulau Indah, PT Harman

Bangun Persada), it is known that the company has provided training/socialization, such as regarding the sustainability policies set by the company.

3.7.3

The unit of certification showed socialization about the supply chain to employees which was last conduct on 28 April 2022. The minutes explained the procedures for managing certified including the responsibilities for each of the personnel who handle products.

The results of interviews with Head of Administration, weighbridge operator in POM and FFB administration in Estate showed that workers have already known the duties and responsibilities of each in the implementation of SCCS in accordance with the procedure and have been able to explain well about the management of certified and uncertified products, especially regarding the origin of the FFB source.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 and 3.8.2

Based on document verification, the Mill implements the MB Module, which is received both FFB from certified and uncertified sources. Verification of Mass Balance record, the Mill has been recorded well the separation of FFB and products (CPO and PK) from certified and uncertified sources.

3.8.3

Estimated certified product recorded in the last assessment report. The estimates of certified production for the next license period describe at ASA-1.2 report (basic info 1.8.3), in reasonable amount taking into account the last year's production. The data are shown in the following table:

Products	Last Year Projected Certified Volume (14 Nov 2021 – 13 Nov 2022) (MT)	Last Year Actual Certified Volume (August 2021 to July 2022) (MT)
FFB Certified (MT)	130,000	122,738.92
CSPO (MT)	27,300	26,778.13
CSPK (MT)	6,500	5,637.78

3.8.4

The Mill has registered as RSPO member under Wilmar International Limited (No. 2-0017-05-000-00) and also has been registered in IT platform palm trace RSPO <https://palmtrace.rspo.org/web/rspo/member-directory> which information as follows:

- Member Name: PT Agronusa Investama - Sambas
- License ID: CB130247
- Core Product: Palm Oil
- Member ID: RSPO_PO1000002130
- Type of Business: Oil Mill
- Supply chain model: Mass Balance

3.8.5

The Mill has had procedures related supply chain, such as SOP of Mass Balance (No. SOP12/ADM-ANI/(02)/0621 revision 02 dated 1 June 2021). These procedures have referred to the latest RSPO Supply Chain System. The procedure has covered all aspects in SCCS model, such as receiving and recording that identify the traceability of RSPO certified and uncertified source and products, FFB processing, the announcement in RSPO Palm trace, key persons such as security, weight bridge clerk, dispatch/kernel officer, production clerk, Administration Head, as well as the training.

Based on interviews in ANI POM note that the weighbridge operators understands the supply chain management system. It also known that training and refreshment (awareness) of supply chain management system were carried out annually.

3.8.6

The procedure for internal audit for SCCS mentioned in Procedure of Audit Internal (No. SOP23/EHS-ANI/(02)/0621, revision 02 dated 1 June 2021). Based on that procedure internal audit carry out minimum one times a year. Based on document review, the company show the record evidence regarding internal audit of RSPO SCCS that conducted on 7-12 June 2022. Based on result of internal audit, there is no non conformity in SSSC indicators and has been correction and complied with RSPO Supply Chain requirements for mills and the RSPO Rules on Market Communications and Claims.

Management Review of RSPO SCCS implementation conducted on 18 February 2022. The management review discussion has covered the input from internal audit result, correction and corrective action, process Performa and product compliance, follow up of previous management review, and recommendation for improvement.

3.8.7

The mill has verified and documented the volumes of certified and non-certified FFBs received. Certified and non-certified FFB received period of 12 months before audit which is August 2021 – July 2022:

Month	FFB (ton)		Total
	Certified	Non-Certified	
August 2021	12,123.27	7,863.56	19,986.83
Sept 2021	11,850.49	6,520.24	18,370.72
Oct 2021	11,184.48	7,221.00	18,405.48
Nov 2021	12,230.31	7,760.80	19,991.11
Dec 2021	11,192.61	5,945.23	17,137.84
Jan 2022	11,006.67	7,039.49	18,046.16
Feb 2022	8,143.75	4,658.07	12,801.81
Mar 2022	10,173.58	6,574.44	16,748.02
Apr 2022	10,035.36	7,348.49	17,383.85
May 2022	2,501.39	735.11	3,236.50
Juni 2022	11,779.13	8,885.46	20,664.59
July 2022	10,517.91	7,919.72	18,437.63
Total	122,738.92	78,471.60	201,210.52

Estimated certified product recorded in the last assessment report (ASA-1.1 + ASA-1.2). Actual certified produced has been verified during this assessment. The data are shown in the following table:

Products	Last Year Projected Certified Volume (14 Nov 2021 – 13 Nov 2022) (MT)	Last Year Actual Certified Volume (August 2021 to July 2022) (MT)
FFB Certified (MT)	130,000	122,738.92
CSPO (MT)	27,300	26,778.13
CSPK (MT)	6,500	5,637.78

According to the data during the certification period, there still not any overproduction yet.

Mechanisms for handling unsuitable FFB and / or documents have included in the supply chain certification standard procedure with document number SOP12/ADM-ANI/(02)/0621 revision 02 dated 1 June 2021.

3.8.8

The mill has product information provided in such as document of contract agreement, delivery order, delivery ticket, report of loading, weighbridge ticket and other invoices, as example at invoices of CSPK certified delivery on 5 August 2022. The information provided

on invoices are:

- The name and address of the buyer (PT Wilmar Cahaya Indonesia – Pontianak, Kalimantan Barat);
- The name and address of the seller (PT Agronusa Investama in Sambas, Kalimantan Barat)
- The loading or shipment / delivery date (5 August 2022);
- A description of the product supply chain model (Mass Balance)
- The date on which the documents were issued (5 August 2022);
- The quantity of the products delivered (8.11 ton);
- Any related transport documentation (transport by Koperasi Anugerah Semaro);
- A unique identification number (4031104246);
- RSPO certificate number (Mutu-RSPO/024);
- etc.

3.8.9; 3.8.10 and 3.8.11

ANI POM has delivered and sold its products CPO and PK (certified and non-certified) only to PT Wilmar Cahaya Indonesia (PT WCI). Any delivery shall be based on Contract towards specific volume of transaction. There is no outsourcing milling activities to the independent third parties on processing, storage and RSPO certified products transportation. CSPO and CSPK transportation are under contract with buyer (PT Wilmar Cahaya Indonesia), which has the same group with PT ANI-Sambas.

3.8.12

The company has had the up-to-date record and report that are kept in mill office, complete, accurate and up-to-date. All the record can be accessed by the auditor, such as record of certified product shipping, sales contract, delivery order/invoice, production report and product sales. Based on document verification on supply chain procedure, retention time for all records and report regarding to supply chain are kept for 2 years.

For instance, record of all certified palm oil/palm kernel oil volumes purchased (input) and claimed (output) for period of 12-months before audit (August 2021 – July 2022):

CSPO

Month	CPO (ton)		Total
	Certified	Non-Certified	
Opening stock	1,208.66	-	1,208.66
August 2021 - July 2022	25,569.47	16,519.27	42,088.74
Total	26,778.13	16,519.27	43,297.40

Month	CSPO Despatch (ton)			Total
	RSPO	Other Scheme	Non-Certified	
August 2021 - July 2022	25,803.42	-	-	25,803.42

CSPK

Month	PK (ton)		Total
	Certified	Non-Certified	
Opening stock	47.87	-	47.87
August 2021 - July 2022	5,589.91	3,542.00	9,131.91
Total	5,637.78	3,542.00	9,179.78

Month	CSPK Despatch (ton)			Total
	RSPO	Other Scheme	Non-Certified	

August 2021 - July 2022	5,488.36	-	-	5,488.36
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3.8.13 and 3.8.14

The conversion rate of production of CPO (OER) and PK (KER) were based on actual daily, monthly and yearly production. The extraction rate follows the actual data for a 12-month period for July 2021 until June 2022 i.e OER 20.90% and KER 4.53%. Periodically update of extraction is actual extraction.

3.8.15

SCSS module used in ANI POM is Mass Balance (MB), because the mill receives FFB from the estate RSPO certified and from third party that non-certified RSPO.

3.8.16

RSPO IT Platform member registration number for ANI POM is RSPO_PO1000002130. The Mill carry out shipping announcement in the RSPO IT platform when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch. For example:

- Certified CPO sold to PT Wilmar Cahaya Indonesia dated 2 July 2022 for 1,412.84 ton and transaction creates in IT Palm Trace dated 18 July 2022.
- Certified PK sold to PT Wilmar Cahaya Indonesia dated 2 July 2022 for 501.81 ton and transaction creates in IT Palm Trace dated 18 July 2022.

Removing Stock

For the Certified PK and Certified CPO, the unit of certification sold all the CSPK and CSPO as RSPO Certified product. There is no removing stock or sell as credits in palm trace.

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.

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 commitment to respecting human rights and explained in Human Rights Policy signed by the Chairman and CEO on January 2018, in which the certification unit strives to respect and protect human rights, personal security free from harassment or abuse in any form, and provide a safe, clean and safe workplace. Healthy and the environment. This policy applies to all Wilmar and related subsidiaries, including suppliers and contractors. This policy is publicly available on the certification unit website in bilingual (Indonesian and English) and has been communicated to all workers, local community representatives and contractors.

In addition, there is also the Company's Code of Conduct, dated June 2019, which states that the company is Wilmar supports the protection of human rights around the world by following the basic principles set out in the United Nations Universal Declaration of Human Rights, The International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights. We take our responsibility to respect human rights seriously. The policy / declaration has been well documented and has been socialized to the workers at the time of the morning briefing and by using warnings placed in several locations to make it easier for workers to find out.

The certification unit has established a policy related to the Defending of Human Rights which was reviewed last on 10 December 2021. Some of the things stated in the policy are that the Wilmar Group supports the protection of human rights defenders, respects the rights of human rights defenders and prevents and mitigates human rights risks. involved in the business operations and supply chain of the Wilmar Group.

Based on the results of interviews with workers and workers' representatives (union workers' unions and gender committees), it is known that there have been no incidents of human rights violations in the company, no employees have been intimidated and or subjected to violence by the certification unit.

Based on interviews with community representatives (Beringin and Semanga Jaya Village), it is known that the certification unit does not use security personnel/private security officers. The unit of certification uses its own employees as security units for estates and mills. In addition there were no problems of confrontation and intimidation by the certification unit to maintain peace and order.

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

4.1.2

Based on interviews with village representatives, contractors and employee representatives (gender committee and workers unions), it was found that there was no violence or intimidation of any kind in the company's operations.

Based on interviews with community representatives (Beringin and Semanga Jaya Village), it is known that the certification unit does not use security personnel/private security officers. The unit of certification uses its own employees as security units for estates and mills. In addition there were no problems of confrontation and intimidation by the certification unit to maintain peace and order.

Status: Comply

4.2

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

4.2.1

The certification unit has a system that is mutually agreed upon, open to all affected parties, can resolve disputes in an effective, timely and appropriate manner, and ensures that the identity (anonymity) of whistle-blowers, human rights defenders, community representatives, and whistle-blowers is protected, including in the Whistleblowing Policy, Version 5: 1 February 2018.

Procedure including outlining several things such as:

- Explanation of the Grievance Handling Process
- Reception and Recording of Complaints
- Responses and or responses to complaints and dissatisfaction
- Complaints can be submitted directly or indirectly
- Information and data on complaints and complaints received can be published or kept confidential to other parties based on the consent of the complainant.
- The company guarantees the anonymity of reporters and reporters with the aim of reducing the risk of retaliation.

In general, all field management staff (assistant managers) and workers' supervisors directly play a role in managing worker complaint handling.

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

Based on the results of interviews with workers and worker representatives (union workers' unions and gender committees), it is conveyed that complaints can be submitted to direct superiors, as well as to trade unions or to the gender committee (complaints specifically for women's issues).

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

4.2.2

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

provided the third party follows the procedure and has been given the mandate clear. Illiterate people can submit their complaints through the village head or another representative from the stakeholder and also recorded.

The last communication been carried out on April 12, 2022.

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

4.2.3

As explained in the previous indicators, it is known that there are procedures related to communication and consultation procedures. Regarding how the certification unit informs the progress of complaint handling to the parties, this is done in several ways such as through a complaint and dissatisfaction recording form or with a company representative appointed as a liaison between the two parties who can hold formal and informal meetings as well as direct communication or by telephone.

4.2.4

The certification unit has a conflict resolution mechanism including the option to obtain legal and technical assistance from an independent party, which is stated in the Procedure for Handling of Complaints No. SOP 60/WIP-KB/(01)/0915 Revision 02, dated January 6, 2021. This system refers to the Wilmar Group Policy (Version 3, No. 042/DIR-KP/VIII/2015, dated August 5, 2016, the Policy is stated in the Complaint Data Handling Form. The document is described in point 4. Objectives and Policies in Sub-point 4.1 it is explained that this policy aims to provide assurance to whistle-blowers who have a good will to report suspected abuse or divergent practices. Whistle blowers will be protected from retaliation or actions that may harm the whistle-blower. Furthermore, in point 7 regarding Confidentiality, it is explained that the certification unit encourages the whistle-blower to write a clear and complete identity when reporting irregularities that occur. All forms of reporting irregularities will be guaranteed confidentiality by the certification unit. If the complaint cannot be resolved by consultation, it can follow up the next step or go through the process to the RSPO.

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

Status: Comply

4.3

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

4.3.1

Based on document verification and interviews, the following evidence was obtained:

- The company shows CSR Programs for the 2022 Period including:
 1. Road Repair Assistance for Village Infrastructure and Facilities
 2. Village Office Repair Assistance
 3. Assistance for school renovation and school facilities
 4. Assistance in school/university educational activities
 5. Support facilities for community empowerment
 6. Provision of basic food vaccines for the Covid 19 Sambas Regency
 7. Assistance with activities related to culture
 8. Assistance for religious events and facilities
- Then, from the results of an interview with one of the Semanga Village hamlets, it was conveyed that they questioned what PT ANI's CSR program is for their village.
- The company has not been able to show evidence that CSR or contribution to community development is based on the results of consultations with local communities.

Based on this evidence, the Company has not been able to show evidence that CSR or contribution to community development is based on the results of consultations with local communities. **Non conformity No. 2022.05 with Minor Category.**

4.3.1 Status: Non conformity No. 2022.05 with Minor Category

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

As per August 2022, unit of certification was still ongoing to obtain Land Title (HGU). However, supporting compulsory documents on land title issuance were available, such as:

- Location permit as refers to Decree of Sambas Regent No. 46 year 2006 dated 14 March 2006 for area covers 12,500 ha and has revised through Decree of Sambas Regent No. 269 year 2009 dated 30 June 2009 for area covers 12,440 ha.
- Business permit for oil palm plantation as refers to Sambas Regent Decree No. 372 year 2008 dated 19 December 2008 about Plantation Business Permit (IUP) for oil palm plantation activities with area covers 12,500 ha and its processing mill with capacity 60-ton FFB/hour.
- Decree of Head of Forest Zone Stabilization Unit or *Balai Pemantauan Kawasan Hutan* (BPKH) No. S.160/VIII/BPKH-II/2009 dated 24 April 2009 mentioned that all areal in location permit of PT ANI Sambas were situated on non-forest areas or *area penggunaan lain* (APL).
- Cadastral Map for Land Title Proposal No. 23/2018 dated 10 July 2018, that covers 8,839.4556 ha.

Furthermore, legal basis for Cooperative of Sentama Lestari and Cempaka Biru Smallholder are shows through the Regent of Sambas Decree No. 194 year 2010 dated 17 June 2010 about Appointment of Prospective and Candidates of Participants of Plantation (*Calon Petani Calon Lahan*) as Revitalization Program of Palm Oil Commodity in Village of Semanga and Sepantai, District of Sejangkung and in Village of Beringin, District of Sajad, Regency of Sambas District. Both smallholder cooperative program is fully managed by PT ANI Sambas unit management.

According to explanation from representative management of PT ANI Sambas, the area and boundaries of the of the owned estate of PT ANI Sambas and the plasma areas will be clarified through boundary marks when the HGU Certificate of PT ANI issued by the National Land Agency. Furthermore, based on field visit, it was known that HGU poles already installed on the cooperative sites. Based on Area Statement August 2022, detail of land usage is presented in the following Table:

<u>Unit Area</u>	<u>Hectare Area (ha)</u>
ANI Kumpai Estate	2,930.95
ANI Senabah Estate	4,055.55
Cooperative Sentama Lestari	935.29
Cooperative Cempaka Biru	469.82
Total	8,391.61

Land Title acquisition progress during remote audit ASA-1.1

- On 09 April 2019, the company sent a letter to the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency of the Republic of Indonesia through the Head of the Sambas Regency Land Office regarding the application for HGU on behalf of PT Agronusa Investama. Then orally, National Land Agency suggested that the application for the HGU should be submitted together with the application for the plasma HGU.
- On 18 September 2019, BPN of Sambas Regency sent a letter to PT ANI Sambas containing the document requirements that need to be attached on the HGU application.
- On 10 November 2020, the Directorate General of Land and Spatial Survey and Spatial Mapping of the National Land Agency sent a letter to the Head of the Regional Office of the Kalimantan Barat Province National Land Agency and the Head of the Land Office of Sambas Regency regarding the submission of the revised map of land parcels on behalf of PT Agronusa Investama in Sambas Regency, Kalimantan Barat Province. In the letter, it was informed that the map of land parcels had been made in the name of PT Agronusa Investama map No. 23/2018 dated 10 July 2018 and that the map of land parcels had been revised in the name of PT Agronusa Investama No. 23/2018 (Rev. 01)) dated 30 September 2020.
- At the time of the ASA-1.1 remote audit, the company had prepared a legalized document from a notary for the nucleus HGU application, but the plasma plantation HGU application was in the process of legalizing preparation before it would later be sent to National Land Agency.

Land Title acquisition progress during onsite audit ASA-1.2

- As land title for PT ANI Sambas shall be together with its smallholders' scheme land title, cadastral map for those smallholder cooperatives it summarized in the following Table:

Cooperative	Village	Area (ha)
Sentama Lestari	Semanga	± 719.3000
	Sepantai	± 36.4450
	Beringin	± 177.0560
	Sub-total (ha)	+ 932.8010
Cempaka Biru	Semanga	± 473.9902
Anugerah Semaro	Sabung	± 128.1023
Pusaka Abadi Nan Jaya	Semanga	± 311.4600
Total (ha)		± 1,846.3535

- HGU proposal for Cooperative of Anugerah Semaro No. 022/B/Kop.AnugerahSemaro/HGU/XII/2020 dated 24 December 2020 for area covers ± 128.1023 ha, which had Letter of Introduction from BPN of Sambas Regency No. HP.01.03/187-61.01/IV/2021 dated 14 April 2021.
- HGU proposal for Cooperative of Sentama Lestari No. 010/SL/HGU/XII/2020 dated 24 December 2020 for area covers ± 932.80 ha which had Letter of Introduction from BPN of Sambas Regency No. HP.01.03/188-61.01/IV/2021 dated 14 April 2021.
- HGU proposal for Cooperative of Pusaka Abadi nan Jaya No. 003/PANJ/HGU/XII/2020 dated 24 December 2020 for area covers ± 311.46 ha, which had Letter of Introduction from BPN of Sambas Regency No. HP.01.03/189-61.01/IV/2021 dated 14 April 2021.
- Pra-Panitia* or Pra-Committee B had conducted on 22-23 July 2021 by Kanwil. BPN Province of Kalimantan Barat that involving surrounding Head of Village, BPD and Elders.
- Panitia* B of Kalimantan Barat will be carried out in 23-23 November 2021 for PT ANI Sambas and its smallholder cooperative scheme.

Land Title acquisition progress during onsite audit ASA-1.3

The company has shown positive progress regarding the HGU acquisition process since the previous audit, namely:

- On 22-23 July 2021 the Regional Office of the BPN of Kalimantan Barat Province carried out pre-committee B activities or field inspections of the area requested for HGU by PT Agronusa Investama by involving the Village Head, Village Consultative Council, and local community leaders whose administrative area is within PT ANI's operations.
- On December 1, 2021 the Regional Office of BPN for the Province of Kalimantan Barat carried out the activities of Committee B on the application for PT ANI's Cultivation Rights with its partnership cooperative. Then the results of a study from the Forest Area Consolidation Center for Region III stated that there was a PIPPIB slipper in the HGU application area, both the PT ANI core and the plasma area of the Serba Usaha Sentama Lestari Cooperative, Serba Usaha Cempaka Biru Cooperative as well as Pusaka Abadi Nan Jaya Cooperative. The area of the PIPPIB slipper area is ± 20 Ha and for the area that is on the PIPPIB map to consult with the Directorate of Inventory and Monitoring of Forest Resources
- Following up on the results of the study, PT ANI has sent a letter to the Director of Inventory and Monitoring of Forest Resources, Directorate General of Planning and Environmental Management, Ministry of Environment and Forestry via letter No. 02/ANI/Leg-AdmJk/I/2022 dated 12 January 2022 requesting a PIPPIB revision.
- Then a Letter from the Directorate of Inventory and Monitoring of Forest Resources, Directorate General of Forestry Planning and Environmental Management, Ministry of Environment and Forestry of the Republic of Indonesia dated July 13, 2022 regarding the response to the PIPPIB revision request on behalf of PT ANI in Sambas Regency, Kalimantan Barat Province stated that some of the areas included in the PIPPIB is the remaining polygons resulting from digital spatial data processing in the previous PIPPIB revision process and PT ANI's application area which is still included in PIPPIB is used as material for revision of maps indicative of discontinuing the granting of business permits or changes to the allotment of new forest areas in primary natural forest and subsequent peatlands.
- After receiving the response letter from the Ministry of Environment and Forestry, PT ANI is in the stage of carrying out the latest review from the Forest Area Consolidation Center Region III and the Kalimantan Barat Province Environment and Forestry Service on the area of PT ANI's HGU application, Sentama Lestari Cooperative, Pusaka Abadi Nan Jaya Cooperative and Anugerah Semaro Cooperative.
- On July 22, 2022, a Letter was obtained from the Head of the Regional Forest Area Consolidation Center II which stated that based on the Letter of the Directorate of Inventory and Monitoring of Forest Resources, Directorate General of Forestry Planning and Environmental Management, Ministry of Environment and Forestry of the Republic of Indonesia dated July 13, 2022, it was stated that the area included in PIPPIB is the residual polygon resulting from digital processing of spatial data in the previous

PIPIB revision process as well as the results of the revision of the land plot map in the PT ANI area, still included in the PIPPIB map but becoming the next PIPPIB revision.

- While the ASA-1.3 audit is taking place, PT ANI will send a letter to the Kalimantan Barat Provincial BPN and attach the results of an explanation from the Directorate of Inventory and Monitoring of Forest Resources, Directorate General of Forestry Planning and Environmental Management, Ministry of Environment and Forestry of the Republic of Indonesia and the Center for Forest Area Consolidation Region III and the Kalimantan Barat Provincial Forestry Service while waiting for the results of the revision from PIPPIB period 2 of 2022 so that the process of issuing PT ANI's HGU Decree and HGU Certificate can be processed.

The unit of certification is encouraged to continue to ensure positive progress in the process of obtaining PT ANI HGU. OFI

4.4.2

Wilmar International, Ltd. has acquires PT ANI-Sambas (previously named PT Bantanana Eka Jaya) from PT Ivomas Tunggal on 2004. Process of land compensation after acquisition had settled up since 2014, summarized as follows:

Village	Area (ha)
Semanga	7,576.88
Beringin	794.51
Sepantai	170.00
Sabung	723.93

Process of negotiation of land compensation has conducted through participatory approach, FPIC manners and did not diminish any legal rights and/or customary rights. For example, Statement Letter of land Compensation that registered under Public Notary Hardiansyah, S.H. No. 35/LISTV/2009 dated 01 May 2009 had signed by Head of Sepantai and Satai Hamlet Village, Head of Sejangkung District (Camat) and Manager of PT ANI. During 2021 to August 2022, there is no process of land compensation payment, nor conflict related to land occupation.

4.4.3

Participative map with scale 1: 50,000 has presented in HCV assessment report that conducted by Malaysian Environment Consultant (MEC) in 2011. The making of map has been carried out through focus group discussion (FGD) to the previous land owners as respective stakeholders. Furthermore, MEC report also informed that there is no customary right within PT ANI operational areas. During 2021 to August 2021, there is no process of land compensation payment, nor conflict related to land occupation.

4.4.4

Based on interview with representative of previous land owners and surrounding communities (Beringin Village and Semanga Village), it was known that process of compensation has been carried out smoothly, transparent, voluntary and fair through participative and FPIC approach. Land compensation process has been recorded on several documents, for example as shows through compensation payment dated 19 September 2008, as follows:

- Payment receipt for previous land owner with initial AHM from Senabah Hamlet, Semanga Village.
- Payment receipt for previous land owner with initial ISM from Setambah-Semakuan Hamlet, Semanga Village.
- Payment receipt for previous land owner with initial HRL from Satai Hamlet, Sepantai Village.
- Payment receipt for previous land owner with initial ASM from Beringin Village.
- Payment receipt for previous land owner from Sabung Village, Subah District.

Those payment process has involving Head of Village, Local Elders and Government Agencies from District. All documents mentioned above are available in Bahasa and signed by the respective parties. Thus, it could be concluded that process of compensation or acquisition has conducted through FPIC manners and did not diminish any legal rights and/or customary rights.

4.4.5

Based on public consultation with previous land owner and village representatives from Beringin Village and Semanga Village, known that all land acquisition between local people and company representatives conducted as mutual agreement and with Bahasa that understood by all parties involved. The compensation process is done directed to the land owner and not diminish the legal/customary right; landowners are given the freedom to release their land without coercion.

4.4.6

Based on the results of interviews with stakeholders (Beringin Village and Semanga Village and plasma cooperative representatives and previous land owner), it was informed that the company has had a positive impact such as employee recruitment and plasma provision. Land compensation has final since 2014 and no more land compensation negotiation process up to surveillance assessment in August 2022. All compensation process in the past has conducted through participative and FPIC approach, without any conflicts.

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 new land acquisition since the latest of acquisition in 2008. Furthermore, according to HCV assessment by Malaysian Environment Consultant (MEC) in 2011, it was known that there is no customary right within PT ANI operational areas.

Based on interview with representative of previous land owners and surrounding communities (Beringin Village and Semanga Village), it was known that process of compensation has been carried out smoothly, transparent, voluntary and fair through participative and FPIC approach. Process of compensation or acquisition has conducted through FPIC manners and did not diminish any legal rights and/or customary rights.

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

The company has procedure of Land Compensation, document No. OPS-006/(1)-1008 dated 15 October 2008 related to identifying legal, customary or user rights, and for identifying people entitled to compensation. Based on public consultation with previous land owner and village representatives from Beringin Village and Semanga Village known that they know about the procedure through the socialization given and they agree with the procedure.

4.6.2

The company has procedure of Land Compensation, document No. OPS-006/(1)-1008 dated 15 October 2008, procedure of guidance on land acquisition, document No. SOP 29/BM/(0)/0409. The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on public consultation with previous land owner and village representatives from Beringin Village and Semanga Village known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the land owner and landowners are given the freedom to release their land without coercion.

4.6.3

PT ANI already has cooperation in the development of plasma plantations namely Sentama Lestari Cooperative, Cempaka Biru Cooperative, Serimaram Cooperative, Anugrah Semaro Cooperative and Pusaka Abadi Nan Jaya Cooperative. Based on the data from the farmers in the Cooperative, it is known that there are farmers with gender and women. This indicates that there are equal opportunities for men and women to have land rights in the plasma.

4.6.4

Based on interview with representative of previous land owners and surrounding communities (Beringin Village and Semanga Village), it was known that process of compensation has been carried out smoothly, transparent, voluntary and fair through participative and FPIC approach. Land compensation process has been recorded on several documents, for example as shows through compensation payment dated 19 September 2008, as follows:

- Payment receipt for previous land owner with initial AHM from Senabah Hamlet, Semanga Village.
- Payment receipt for previous land owner with initial ISM from Setambah-Semakuan Hamlet, Semanga Village.

- Payment receipt for previous land owner with initial HRL from Satai Hamlet, Sepantai Village.
- Payment receipt for previous land owner with initial ASM from Beringin Village.
- Payment receipt for previous land owner from Sabung Village, Subah District.

Those payment process has involving Head of Village, Local Elders and Government Agencies from District. All documents mentioned above are available in Bahasa and signed by the respective parties. Thus, it could be concluded that process of compensation or acquisition has conducted through FPIC manners and did not diminish any legal rights and/or customary rights.

Status: Comply

4.7

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

4.7.1

The company has a procedure in place to identify people and/or community groups entitled to compensation presented in document No. OPS-006/(1)-1008 dated 15 October 2008. The procedure is described how to identify people and/or community groups entitled to compensation. Based on public consultation with previous land owner, plasma cooperative representatives and village representatives from Beringin Village and Semanga Village known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the land owner and landowners are given the freedom to release their land without coercion.

4.7.2

The company has procedure of Land Compensation, document No. OPS-006/(1)-1008 dated 15 October 2008. The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on public consultation with previous land owner, plasma cooperative representatives and village representatives from Beringin Village and Semanga Village known that they know about the procedure through the socialization given and they agree with the procedure and they can access the procedure through management representative of the company if they need it.

4.7.3

The company can show recapitulation of previous landowners who have been compensated. Based on public consultation with previous land owner, plasma cooperative representatives and village representatives from Beringin Village and Semanga Village, the communities that have lost access and rights to land also provided opportunities to benefit from plantation development such as plasma plantation cooperation, job opportunity and other benefit in the form of CSR program.

Status: Comply

4.8

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

4.8.1, 4.8.2 and 4.8.4

Based on public consultation with related government agencies of Sambas District and village representatives (Beringin Village and Semanga Village), known that there is no land dispute case for the last 1 years until this assessment conducted in the scope certification area. Based on interviews with management of unit certification and the results of the auditor's search on online media, there is no historical or current land dispute in unit certification.

4.8.3

No evidences show that there is any acquisition process through dispossession or forced abandonment. Based on public consultation with related government agencies of Sambas District and village representatives (Beringin Village and Semanga Village) and 3 previous land owners, known that all land acquisition between local people and company representatives conducted as mutual agreement and the compensation process are done directed to the land owner and not diminish the legal/customary right, landowners are given the freedom to release their land without coercion.

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1**The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.****5.1.1**

The company can show the FFB price fixing document either for plasma or for 3rd party suppliers. Plasma FFB pricing refers to the price set by the Kalimantan Barat Provincial Plantation Office. Meanwhile, the price for third party FFB suppliers is determined by Wilmar's marketing department which adjusts to market prices, the determined price is then informed through the supplier group network.

For example, the price of FFB at the Plantation Service for the second period of July 2022 refers to a letter from the Kalimantan Barat Provincial Plantation Office dated July 29 2022. It is explained in the letter that prices differ from ages 3-9 years, 10-20 years and 21-25 years. The lowest price is Rp. 1,177.58 for plants aged 3 years and the highest price is Rp. 1,578.47 for plants aged 10 to 20 years.

Based on the results of interviews with the Cempaka Biru cooperative and the Sentama Lestari cooperative, it is known that the price of FFB set by the company is in accordance with the price set by the Plantation Office of Kalimantan Barat Province. In addition, there are no complaints from farmers regarding the price of FFB.

To update FFB prices to Smallholders and Third-Party companies will inform price changes through Whats App Message and include prices on the information board on Mill. It has been added in the report.

Based on the above document, the management unit can show the current FFB prices and publicly available prices.

5.1.2

The FFB price for farmers is determined by the Kalimantan Barat Provincial Plantation Office. In determining the price of FFB, farmers are also involved. The plasma farmers always know the price of FFB because every time there is an update on the price of FFB, the company always provides information to the cooperative leaders to inform all of its members. This is in line with the results of consultations with cooperative management which stated that information regarding the price of FFB is known every week via WhatsApp messages.

5.1.3

As explained in indicator 5.1.2, the price of FFB to farmers is determined by the Kalimantan Barat Provincial Plantation Office. In determining the price of FFB, farmers are also involved. The determination of the FFB price is always known by the Scheme smallholders. The price agreement has also been explained in the cooperation agreement between the company and the farmers where the price of FFB is based on the price set by the Plantation Office. For the determination of the premium value until the assessment activity is carried out there has been no determination of the premium value between the company and the farmer.

5.1.4

Based on the results of interviews with the chairman of the Cempaka Biru cooperative and the Sentama Lestari cooperative, it was found that the cooperative had understood the contract/MoU with the company and there was no coercion from the company. So far, the cooperation with the company has been going well and the cooperative has the authority to make decisions.

5.1.5

Based on the results of a review of the Scheme Smallholders agreement document, it is known that the existing contracts are made fairly, in accordance with applicable law and are transparent, and have an agreed time period, as stated in the Partnership Cooperation Agreement between PT ANI and Sentama Lestari Cooperative, dated 9 December 2010. Evidence that the contract has been drawn up fairly is the involvement of both internal and external parties. In addition, the agreement is in accordance with applicable law and is based on legality/licensing documents. Regarding transparency, the plasma agreement letter is also accompanied by a Memorandum of Understanding between Cooperative and the company, notes on proof of land ownership and minutes/minutes of meetings of cooperatives and/or farmer groups that directly or indirectly affect the operations of development and management of

plasma plantations. The period of partnership cooperation starts from the moment the agreement is signed until the age of the oil palm plantations reaches approximately 25 years of age or until the oil palm plasma plantations no longer have economic value. This has been agreed in the agreement in article 5.

5.1.6

Companies can show proof of payment for FFB to FFB suppliers, for example, the Sentama Lestari Cooperative and FFB Suppliers CV Berkat Mandiri Sentosa. As an example, the following is proof of payment for FFB made by the company:

- Proof of payment for FFB to Sentama Lestari for the June 2022 period of 176,157 Kg which was paid through a Bank Mandiri account on June 21, 2022. Based on document verification, it is known that the FFB price paid is in accordance with the FFB price set by the Kalimantan Barat Provincial Plantation Service. The proof of payment also explains proof of deductions in the form of tax deductions.
- Evidence of FFB payment to CV Berkat Mandiri Sentosa for the period of June 2022 as much as 157,703 Kg which was paid through a BCA Bank account on June 17, 2022. Based on document verification, it is known that the FFB price paid was in accordance with the FFB price set by the Kalimantan Barat Provincial Plantation Service. The proof of payment also explains proof of deduction in the form of tax deductions.

Based on the results of interviews with representatives of the Sentama Lestari Cooperative and CV Berkat Mandiri Sentosa, it is known that so far there have been no complaints regarding the price or payment of FFB made by the Company. The cooperation between the Cooperative and the Company is going quite well.

5.1.7

The company has carried out the results of testing the scales carried out by the Department of Cooperatives, Small, Medium Enterprises, Industry and Trade of Sambas Regency, namely:

- Certificate of test results with No. 510.3/054/SKHP/TU-104/XI/2021 dated October 12, 2021 for Avery Weigh-Tronix scales with serial number 150450548 with a capacity of 40,000 Kg from the technical implementing unit for the legal metrology area of the Cooperatives, Small Business, and Small Business Office. Medium, Industry and Trade of Sambas Regency with the results of being ratified for the 2021 re-calculation based on the Law of the Republic of Indonesia Number 2 of 1981 concerning Legal Metrology and re-calibration no later than 12 October 2022.
- Certificate of test results with Number 510.3/055/SKHP/TU-104/XI/2021 dated October 12, 2021 for Avery Weigh-Tronix scales with serial number 190250030 capacity of 50,000 Kg from the Technical Implementation Unit for the legal metrology area of the Office of Cooperatives, Small Business, Medium, Industry and Trade of Sambas Regency with results approved for re-calibration in 2021 based on Law of the Republic of Indonesia Number 2 of 1981 concerning Legal Metrology and re-calibration no later than October 12, 2022.

5.1.8

Based on the results of interviews with management regarding certification for independent smallholders, it is known that currently the company has provided socializations related to RSPO certification, as has been done and the documentation of the minutes was shown on April 12, 2022. Until now there has been no agreement between the certification unit and smallholders. regarding who runs the Internal Control System (ICS), who holds the certificate and who owns and sells the certified material.

5.1.9

The company had an SOP related to "Procedures of complaints management/handlers and/or complaints" that had been approved by (Sr Bina Mitra Staff) and agreed by (General Manager) of Wilmar SOP 60/WIP-KB/ (0)/0915 clause 12 "Stages/procedures for management/complaint handling and/or complaint ordinance:

Point 12 (b): Receive, record and classify material complaints or complaints received (there) include:

2) Recording of complaints: every incoming complaint must be recorded in the complaint form provided in each Work Unit / Operational Unit / Company Business Unit.

3) Any complaints or complaints that have been received and recorded in the form of complaints / complaints that are recorded in the complaint register appendix (Appendix 1) and which are recorded in the Complaints Register Book. Attachment 2 must contain information about:

- Sequential number of complaints
- Date of receipt of complaint
- Name of the reporter who submitted the complaint

- Name of agency officials reported
- Name of staff receiving complaints
- Programs / activities that are complained of
- Material
- Location
- Time of incident
- Source of report

Based on the results of the review of the PT ANI Sambas complaint logbook document, there were no specific complaints from farmers.

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

Based on the results of interviews with management regarding certification for independent smallholders, it is known that at this time the company has provided socializations related to RSPO certification, as has been done and shown the documentation of the minutes on April 12, 2022. So far, no farmers are interested in participating in RSPO certification.

5.2.2

Based on the results of interviews with management regarding the activities carried out to improve the quality and quantity of farmer productivity as well as certain elements of RSPO certification (including the RSPO Standard for Independent Smallholders), it is known that the company has provided outreach and training related to RSPO certification. and increasing the productivity of local farmers, as has been done and shown in the documentation of the minutes on April 12, 2022, which among other things explained about the pests that attack oil palm and their prevention as well as field visits with independent smallholders regarding the good quality of FFB to harvest.

5.2.3

Based on interviews with representatives of farmer cooperatives, it is known that the company has provided assistance in managing the legality of land owned by farmers through assistance in obtaining certificates of land rights since the beginning of the development of oil palm plantations or agreements have been made. The process is still ongoing.

5.2.4

Based on observations and interviews, it is known that plasma is fully managed by the company. The company showed training records related to MSDS and pesticide handling to Sentama Lestari and Cempaka Biru plasma workers, on July 16 2022. For Cempaka Biru Plasma it was held in the morning, which was attended by 25 participants, consisting of spray workers, fertilizers and foremen. For Plasma Sentama Lestari it was held during the day, which was attended by 20 participants, consisting of maintenance workers and foremen.

5.2.5

The company shows evidence of reviewing and publicly reporting on the progress of the farmer support program on a regular basis, described in the partnership department's management review report as well as in the plantation business development report which is reported to the Government of Sambas Regency.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1 & 6.1.3

The certification unit has a commitment to respecting human rights and describe in the Equal Employment Opportunity Policy review on January 2018, explained that Wilmar International is committed to providing equality in employment opportunities to every employee. Our beliefs and labor standards confirm that we will not discriminate when making decision to employees, promotion or retire works/candidates based on race, color, sex, age, social class, religion, sexual orientation, politics, or disability-only subject to the conditions attached to the role to be performed. The fundamental aims is to ensure diverse and representative profiles of workers

through the promotion equality of labor.

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

- The composition of workers consisting of various ethnic groups, religions, gender and workers' origins.
- Recruitment of workers based on the results of selection, performance appraisal, ability and expertise of workers.
- Worker placement and training are carried out in accordance with their expertise / type of work, such as prospective harvest workers are placed as harvest workers and receive regular harvest training.
- Women workers are given equal rights, wages and opportunities to get promotions with male workers of the same type of work, for example there are several maintenance foreman and security who are female workers.

The promotion process is carried out based on skills, capabilities and quality where the assessment is carried out by appraisers, direct supervisors and indirect supervisors. For example, Decree No. 030/ANI-HRR/SK/I/2021 concerning Promotion of Employees in the name of Ja (initials), January 2, 2021. The document, among other things, explains that the person concerned is promoted from class 2B to class 2C.

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

6.1.2

To ensure the implementation, the auditor conducted a review of the worker list document, and it was found that the recruited workers had various educational, ethnic, and religious backgrounds. In addition, based on field observations and result of interview with workers, it is known that workers come from various ethnic groups, religions, races, and genders.

6.1.4

Based on the results of the review of employee recruitment documents, it was found that there was no obligation for prospective female workers to take a pregnancy test. All female workers who were met and interviewed by the auditors during field observations explained that at the time of hiring employees they did not take a pregnancy test, only did a physical health test, administration and interviews.

6.1.5.

Certification unit have Women Working Group (WOW) that has been formed from gender committee and are still active until today in the certification unit which is chaired by the chairperson along with coordinators in several sections and there are representatives in each unit. The main objective of forming a gender committee is to provide a forum that can accommodate the aspirations / complaints of workers (especially women), as company partners in carrying out the activities of socialization related to gender and other policies related to workers' reproductive rights. In carrying out its activities this gender committee always collaborates with the labor union so that the socialization of matters related to women's rights can be conveyed properly and there is no discrimination in terms of gender. The workers also knew of the existence of the gender committee because it had been routinely socialized by its management.

The company shows the Organizational Structure of the Gender Committee 2022 PT ANI 3 POM, which explains

Chairman: SI (initial)

Secretary: EL (initial)

Counselling session: 2 people

Consultation Section: 2 people

The organizational structure consists of men and women.

The results of interviews with women workers and representatives of the gender committee revealed that until now there were no reports / issues / complaints related to gender reported by the workers and at the moment the activities carried out were gender meetings during children healthcare, women recitation weekly and others.

6.1.6

Equal payment of wages has been made by certification unit properly, taking into account the ability, performance, expertise, length of work and other factors as a basis for remuneration. So that the payment of wages provided is in accordance with the burden / duties / types of work respectively. For example, harvesting worker and maintenance worker who get wages in June 2022 and July 2022 whose value is above the minimum wage, but with different amounts based on years of service, ability, attendance and job

performance (structure and scale wage).

In addition, based on the results of interviews with labor union representatives, it was found that the certification unit already has a wage scale structure for each worker based on position, class, work performance, and not based on gender differences or origins.

Status: Comply

6.2

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

6.2.1

Payment documentation is available, including:

- Governor of Kalimantan Barat Decree number 1472/DISNAKERTRANS/2021 concerning the 2022 Sambas Regency Minimum Wage, dated 29 November 2021, which decided the 2022 wage to be Rp. 2,609,393, -.
- Governor of Kalimantan Barat Decree number 893/DISNAKERTRANS/2020 concerning District Minimum Wage and Sambas Regency Sectoral Minimum Wage 2021, dated 20 November 2020, which decided sectoral minimum wages for oil palm plantation districts including the CPO industry of Rp. 2.700.000, -.
- Internal Memorandum No. 018.b/ANI-HRR/IM/II/2022, from Sr. HRR Manager, January 15 2022, regarding the Wage Scale for Employees Groups 2A, 2B, 2C and 2D in 2022, which among other things stipulates: < 1 year 0, 1 – 3 years 10,000 and so on.

Based on the interviews with workers (harvesters, pesticide application workers, and mill operators) and labor union representatives, it concluded that workers have a sufficient understanding of their rights (wages, overtime, incentives, etc.) listed in the *Perjanjian Kerja Bersama* and in accordance with routine socialization provided by the certification unit. Workers' wages in 2022 have been above the minimum wage set by the government. Wage based on years of service, ability, attendance and job performance (structure and scale wage) and there were no late payments every month.

Based on the results of interviews with workers in the mill and estate, it is known that workers understand the documentation of their respective wage payments.

6.2.2 & 6.2.3

The certification unit has *Perjanjian Kerja Bersama* are made in a Bahasa that explains the working conditions and rights / obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, deduction, overtime, sick leaves, holiday entitlement, maternity leave and other provisions. In addition to being generally stated in *Perjanjian Kerja Bersama*, the certification unit also has a decree, policy, memorandum and work contract for workers in orientation period that specifically explain these matters. An example is:

- Internal Memorandum No. 018.b/ANI-HRR/IM/II/2022, from Sr. HRR Manager, January 15 2022, regarding the Wage Scale for Employees Groups 2A, 2B, 2C and 2D in 2022, which among other things stipulates: < 1 year 0, 1 – 3 years 10,000 and so on.
- Decree No. 001/ANI-HRR/SK/II/2022 concerning Recruitment of Employees on behalf of Ir (initials), January 3, 2022. The document, among other things, explains that the person concerned has participated in the selection process for prospective employees.
- July 2022 salary slips for workers with the name of Ma (initial), who have a breakdown of wages in the form of basic wages, benefits, overtime, incentives, fines, and others.
- Overtime Agreement Letter (*Surat Kesepakatan Lembur*) August 2022 that has been accordance with applicable laws for workers
- Etc.

A review of the June and July 2022 wage document for harvester, office worker, maintenance and mill operators prove that the wages received are above the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2022. There are deductions for workers such as tax deductions for PPh 21, BPJS Employment contribution deductions and BPJS Health contribution deductions, which are regulated in contracts and company regulations.

Based on these explanations, it can be concluded that the certification unit has carried out work requirements in accordance with applicable laws and regulations in Indonesia.

6.2.4

The certification unit has provided other good / enough facilities and benefits for workers. Based on the list of facilities owned by the certification unit, it is known that the facilities are available housing, polyclinics, clean water, sports fields, educational facilities, places of worship, and access to electricity:

Based on the results of field observations and interview with workers, it is known that the certification unit has provided proper housing, sanitation facilities, water supply, medical needs, education, sports facilities, worship facilities, shuttle buses for school children and other public facilities and there is no complaints regarding workers facility.

6.2.5

Based on the results of interviews with management, workers, worker representatives and field observations regarding workers' access to proper, sufficient, and affordable food, it is known that there is a pay market every month, markets in nearby villages, mobile vegetable vendors, basic food cooperatives and employees may open shops at their homes.

6.2.6.

In Indonesia no living wage standard is established, so certification unit still implemented the national minimum wages for all workers. In addition to the payment of minimum wages, certification unit has been conducting an assessment of the prevailing wages and in-kind benefits provided to workers in the certification unit aligned with the RSPO Guidance for Implementing a Decent Living Wage. The certification unit has the determination of assessment prevailing wage and all kind of benefits for DLW simulation in 2021 has been included in the calculation of main wage, worker status, housing facility, education, electricity, water sources, healthcare and others.

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

6.2.7

Based on employee list documents verification for the period June & July 2022 in each unit revealed that there were no employees with daily worker/contract worker status for the main types of work (harvesting and FFB processing). The main workers are entirely carried out by permanent employees.

Based on the results of a review of workers' list documents, interviews with the Manpower Office, interviews with trade unions and field observations as well as interviews with workers, it is known that there are no casual, temporary and daily workers employed.

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 unit of certification represents a statement issued by the company explaining that the company recognizes freedom of association. The Human Rights Policy signed by the Chairman and CEO in January 2018, which states that Wilmar International strives to respect and protect human rights. The definition of human rights includes freedom of association. This matter has approved through the existence of SPSI Hukatan, SERBUK and PELIKHA.

Based on the results of interviews with representatives from the Workers' Union, Manpower Office and several workers, it is known that there are policies related to freedom of association and have been implemented well in the field.

6.3.2

Minutes of meetings between the unit of certification and trade unions or workers' representatives freely chosen by workers are available, in the national language. The minutes are available upon request.

- Minutes of the Bipartite Cooperation Institutes Meeting, June 16 2022, at the Mess Staff, which discussed the cleanliness of the housing environment. The meeting was attended by 23 participants consisting of the Powder Workers' Union.
- Minutes of the Bipartite Cooperation Institutes Meeting, July 26 2022, at the Staff Mess, which discussed the implementation of vaccinations.

6.3.3

Management does not interfere with the formation or activities of registered trade unions/organizations, or other freely chosen representatives for all workers, including migrant workers and contract workers. Based on the results of interviews with representatives of each trade union regarding the mechanism for electing trade union officials, it was stated by each worker that management does not interfere in the formation or operation of trade unions. Representatives are freely elected by union members.

Labor union:

Proof of registration of trade unions/labor unions, Name: PT ANI KUMPAI-SAMBAS (SERBUK PT AGRONUSA INVESTAMA KUMPAI) FACTORY, registration proof number: 560/581/Nakertrans-C/2021 dated 16 June 2021, 16th June 2021 from the Sambas Regency Manpower and Transmigration Service. The document also explains the List of Serbuk Members, namely a total of 38 people.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1

PT ANI has a policy related to child protection in the "Child Protection Policy" signed by the Chairman & CEO in January 2018, which states that Wilmar does not tolerate child labor, any forms of child exploitation and child abuse. The company has committed to prohibiting the use of child labor and forced or compulsory labor in its operations. In addition, child labor clauses apply across Wilmar's global operations, including subsidiaries, joint ventures and third-party suppliers.

In addition, the CLA stated that the recruitment requirements for new employees were not to be under 18 years of age.

Based on the results of a review of supplier and contractor work agreement documents, it has been stated in the clause that prohibitive practices involve child labor, forced labor, and workers from human trafficking. This has been explained in indicator 2.2.3.

In addition, based on the results of field observations in residential and office areas, it is known that there are signs/warnings prohibiting child labour.

6.4.2

Policy on minimum age for recruitment is presented in Child Protection Policy" signed by the Chairman & CEO in January 2018. For example, on the *Iklan Lowongan Kerja* 20 July 2022, age requirement is presented in Point No. 1 which mentioned that age with range 19 to 30 years old will be accepted for selection. These document informed date of birth. Furthermore, according to list of employees as per July 2022 review, it was known that nobody accepted as employees below 18 years old. Moreover, policy on minimum age has also implemented for contractors. Based on contractors' employees 2022 review (ex. PT Harman Bangun Persada and PT Primanru), it was known there were no workers under 18 years old.

Based on the results of field observations at mill and estate, it is known that in the field there are no workers under 18 years of age.

Based on the results of interviews with the Workers Union, it is known that the company only accepts workers aged 18 years and over and, in the field, there are no workers under 18 years of age.

6.4.3

The unit of certification does not employ young workers.

Based on the results of field observations on operational activities at the Mill and Estate, there are no young person or students who carry out field work practices in oil palm plantations.

6.4.4

Based on the results of field observations, it is known that there is a policy on prohibiting child labor using warnings installed at strategic points such as housing areas, office areas, warehousing areas and access to villages. In addition, the employment agreement with the contractor has also been stated regarding the prohibition of child labor, which among other things explains that the age of the worker must be above 18 years.

Based on the results of the study of employee data documents and field observations, there was also no finding of child labor under the age of 18 years. The results of public consultations with village representatives, contractors also found that the company prohibits underage workers.

Status: Comply	
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	
<p>6.5.1 Unit of certification policy towards preventing sexual and other form of harassment and violence is presented in <i>Piagam Wanita</i> dated 1 May 2019. This policy has been socialized to all employees in each estate, mill and local contractor. Certification unit can show documentation, attendance lists and socialization materials.</p> <p>Based on the results of interviews with the WOW, it is known that the company has policies on the prevention of sexual harassment and violence. This policy has been communicated to all workers during morning briefing, <i>Posyandu</i> activities or special times specified. The gender committee also explained that so far there have been no incidents of sexual harassment and violence.</p> <p>6.5.2 Based on the results of interviews with the WOW, it is known that the company has policies regarding the protection of reproductive rights, especially for women, such as menstrual leave (H1). They explained that if the female employees wanted to take H1 leave, they had to do a check in the company clinic and rest at the company clinic.</p> <p>6.5.3 The certification unit has conducted an assessment of the needs of new mothers by asking for their opinions and taking actions to meet the needs that have been identified according to applicable regulations in Indonesia. The implementation has been implemented, namely giving permission for 45 days postpartum, giving permission to breastfeed according to the needs of the baby, providing a clinic as a treatment facility, routine <i>Posyandu</i> activities.</p> <p>Based on the results of interviews with the WOW, it is known that when a new mother gives birth, the company provides easy job which is located close to the housing so that the new mother can provide exclusive breastfeeding to his son.</p> <p>6.5.4 The company also has a Complaint Procedure on the Application of Wilmar's No Deforestation, No Peat, No Exploitation (NDPE) Policy update version 2.0 June 2019. At point 4 in the document it is explained about the Protection of Human Rights Defenders, Whistleblowers, Complainants and Community Spokespersons as well as complaints cases that can investigated through external mechanisms such as the RSPO complaints procedure.</p> <p>Based on the results of interviews with workers and workers 'representatives (workers unions and gender committees/ WOW), it is known that complaints can be submitted to direct superiors, as well as to trade unions or to the gender committee (complaints specifically for women's issues).</p> <p>Based on the results of interviews with the Gender Committee/ WOW, it is known that the complaint mechanism can be done in person or by letter. To date, no reports have been submitted to the Gender Committee.</p>	
Status: Comply	
6.6 No forms of forced or trafficked labour are used.	
<p>6.6.1 The certification unit have policies related to human right is presented in Human Right Policy of Wilmar which issued on January 2018. The policy explains that the certification unit will respect workers' rights in accordance with applicable regulations, such as child labor, forced labor and elimination of discrimination. The procedures related to human resources management shows that every worker has a work agreement that describe specific job description.</p> <p>Based on the results of interviews with workers in the mill and estate, it is known that workers are given a copy of the employee appointment letter.</p> <p>Based on the results of interviews with workers it was also stated that there was no compulsion in work. Work is carried out in accordance with the work placement. If the worker wants to resign, this has been explained in the Collective Labor Agreement.</p> <p>6.6.2</p>	

Based on employee data review, most of the workers came from local communities, Javanese and Malaya and other ethnicity. In employee list July 2022, known that there is no migrant workers or forced labor. Every worker has a work agreement that describe specific job description, there is no substitution of contract without prior consultation and agreement from the worker. Most of the workers came from local communities. They have the recruitment process in the certification unit and is in accordance with applicable employee acceptance procedures.

There is no significant obstacles related to employment or violations of company regulations. For example, for the harvesters works daily based in 7 working hours. Certification unit provides output targets that can be obtained in less than 7 hours of work. If the harvester obtains more output within or more than 7 working hours, then the harvester will get the harvest premium payment. No penalty is given to the harvester if it does not get output due to natural factors such as rain. Based on payment list on July 2022, the harvesters have earned above the minimum wage.

Based on the results of a review of workers' list documents, interviews with the Manpower Office, interviews with trade unions and field observations as well as interviews with workers, it is known that there are no casual, temporary and daily workers employed.

Status: Comply

6.7

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

6.7.1

The certification unit already has a OHS organization in accordance with the Decree of the Head of the Social, Manpower, and Transmigration Service of Kalimantan Barat Province Number. 120/NAKERTRANS.P2K3/2022 concerning the Formation of OHS Committee Management Organizational Structure of PT ANI Sambas, stipulated in Pontianak on 12 August 2022. OHS Committee secretary is a worker with the initials HK. The CH shows the OHS expert authority card for OHS Expert of the relevant official from the Ministry of Manpower of the Republic of Indonesia dated September 09, 2019, valid for 3 years.

The CH has an OHS Committee in each unit which is responsible for the implementation of OHS aspects. One of the activities of the OHS Committee is to conduct monthly evaluations related to the implementation of OHS programs. For example, in the OHS meeting on 27 May 2022, they discussed about Action Plan and OHS program. In the OHS meeting on 08 July 2022, they discussed about Internal audit OHS System Management.

6.7.2

Based on document review, field observations and interviews with management representatives, the following facts were found:

- Based on field observations in Mill laboratories and workshops, it was found that the contents of the first aid kit were in accordance with Regulation of the Minister of Manpower and Transmigration 15 of 2008 (21 items contained).
- Based on field observations at Kumpai Estates, it was found that 3 first aid bags examined were in accordance with Regulation of the Minister of Manpower and Transmigration 15 of 2008 (contains 21 items).
- Based on field observations at Senaba Estate found that 1 out of 2 first aid bags examined totaled 12 items.
- Based on field observations at the Kumpai Estates fertilizer warehouse, it was found that the contents of the first aid kit were not in accordance with Regulation of the Minister of Manpower and Transmigration 15 of 2008 (no Aquades, scissors, tweezers, eye glasses, flashlights and safety pins) and the Aquades were replaced with mineral water.
- Based on field observations at the Sentama Lestari Cooperative, it was found that there were 21 items of first aid kits with distilled water replaced with mineral water.
- Circular Letter from EHS, dated 3 January 2022, regarding the availability of Aquades, which experienced a delay in arrival, so it was replaced with Mineral Water.
- Purchase Order document dated 05 August 2022 related to procurement of first aid contents, such as distilled water, small flashlights, gauze, rivanol, bandages and others.
- First Aid Procedure for Accidents, document number SOP 34/WIP-KB/(0)/2011, Revision 0, effective date January 2011, which states that the contents of a first aid kit bag are 21 items in accordance with Regulation of the Minister of Manpower and Transmigration No. 15 of 2008 concerning first aid at work.

Based on the explanation above, it is known that the contents of the first aid boxes and bags available in the field are not in accordance with the procedures set by the company. This becomes a **Non conformity No. 2022.06 with minor category**.

6.7.3

Use of PPE

Based on field observations, document reviews and interviews with workers, it is known:

- Based on field observations at the ANI POM such as Press, Clarification, Kernel, and Boiler stations, it was found that operators were wearing health masks. Based on SOP02/EHS-ANI/(01)0411 regarding PKS PPE which was approved by the Mill Head which took effect on December 2, 2015 it is known that the masks used at the Press, Clarification and Kernel stations are dust masks (masks). While at the Boiler station, use a chemical and dust mask with a respirator.
- Based on interviews with 2 manual maintenance workers in block 907 of the Sentama Lestari Cooperative, it was found that 1 worker was wearing a torn boot. Information from the employee that the damage had been reported for about a month, but had not yet received a replacement.
- From the results of field visits during spraying activities with the Supremo trademark herbicide at Kumpai it was found that the spray workers used Carbon Active filter masks. While MSDS Supremo states that one of the safety instructions for workers is to use a fine dust mask (class P1) or an air respirator.
- Then found the use of face shield PPE by workers when carrying out spraying activities at Kumpai while not covering their faces.
- The use of PPE face shields that do not cover the face and the use of masks that do not cover the nose were also found during observations of NPK fertilization activities at the Sentama Lestari Cooperative, Cempaka Biru Cooperative & Kumpai.

PPE Washing and Storage

- Based on the results of interviews with farmers at the Cempaka Biru Cooperative and Sentama Lestari Cooperative, it is known that PPE in the form of masks, face shields, rubber gloves and aprons are washed in the river and taken home after work.
- Based on the results of interviews with herbicide applicators at Senabah, it is known that PPE in the form of an apron is taken home after work.
- Senabah shows the minutes of the socialization of PPE storage in the PPE Warehouse and moving Aprons from workers' homes to the PPE Warehouse which was carried out on 10 August 2022.
- The Farm PPE Matrix states that PPE in the form of masks, face shields, rubber gloves and aprons must be stored in the sterilizer bathroom (rinse house).

Based on the explanation above, it is known that the use, washing and storage of PPE is not in accordance with the MSDS and procedures established by the company. This becomes a **Non conformity No. 2022.07 with minor category**.

6.7.4

For health services for workers, the company already has a Clinic facility located in the estate unit The types of services provided include:

- Emergency Unit
- Basic medical services / General examination
- Childbirth and Family Planning

Companies can show proof of payment for Social Security Agency of Health and Social Security Agency of Employment, for example for each unit in June and July 2022.

Based on interviews with Manpower Office Sambas Regency, it is known that regarding the Social Insurance (Social Security Agency) program, there are no issues and all employees are registered in the BPJS program.

Based on the results of interviews with workers in mills and estates, it is known that all the workers interviewed have been enrolled in the Social Security Agency Employment and Health facilities. Workers also stated that they had no complaints regarding the facility.

6.7.5

The company has records of work accidents resulting in periodic loss of working time. As of July 2022, there were 2 work accidents which caused 3 working days to be lost. So the value of FR 13.76 and SR 1.65.

6.7.2	Status: Non conformity No. 2022.06 with minor category
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6.7.3	Status: Non conformity No. 2022.07 with major category
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PRINCIPLE #7 PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT

7.1

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

7.1.1

The CH has an SOP for integrated pest control plan listed in the procedures for protecting plants and pests and diseases (Agronomy Guidebook and SOP for Palm Oil 2015), which among other things regulates detection and census, thresholds, biological, chemical and manual control. SOPs were prepared as a guideline for controlling pests and diseases in oil palm plantations in accordance with management policies. The process of controlling pests and diseases includes detection, census, control recommendations, control, and evaluation.

The results of the field visit, it was found that in Senabah Estate Block 207 Phase 1 Divisi 1 there were small holes in the midrib that had been caused by the attack of the bug worm. From the census document, it is known that the area in early 2022 had an attack above the threshold, and biological control was carried out using *Turnera ulmivolia*, larva picking, and chemical control using klorantraniliprol on July 2022. Control is carried out based on a census and is only carried out in the main affected areas. By August, attacks had fallen below threshold.

7.1.2, 7.1.3

Based on the results of field observations to Senabah Estate, Kumpai Estate, Sentama Lestari Cooperatives, and Cempaka Biru Cooperatives as well as interviews with management representatives, it was found that the company only uses *Turnera ulmivolia* as an invasive species according to the Minister of Environment Regulation No. P.94 of 2016. These plants are planted on the side of CR and MR roads, and are well maintained. From the results of the interview, it was also known that there was no application of pesticides through the air. If it is necessary to control pests using pesticides, the application is done by spraying using a cap sprayer.

Status: Comply

7.2

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

7.2.1, 7.2.2, 7.2.3, 7.2.4, 7.2.5

The CH shows the justification for the use of all pesticides, which are listed in the PT ANI - Sambas Justification Agrochemical List 2022. These documents include explaining the types of pesticides, trademarks, active ingredients, WHO class, character, form, targets, producers and distribution permit registration numbers. Based on this document, the CH has justification for 7 types of herbicides, 6 types of fungicides, 8 insecticides, and 1 type of rodenticide which are not included in the World Health Organization (WHO) Class 1A or 1B list or are included in the Stockholm or Rotterdam Conventions and paraquat.

Based on field observations at Senabah Estate, Kumpai Estate, Sentama Lestari, and Cempaka Biru Cooperatives revealed that the pesticides used were glyphosate and methyl metsulfuron for broadleaf weeds. The company has documented pesticide use, LD 50, application area, and material usage per hectare, so that it can be seen whether the use of pesticides has increased or decreased from year to year. For example, the use of methyl metsulfuron at Sentama Lestari Cooperatives in 2022 is 0.025 kg active ingredient/ha and in 2022 it is 0.021 kg active ingredient/ha. Methyl metsulfuron is included in WHO class II with an LD50 > 5000mg/kg.

The company shows procedures/policies related to pesticide mitigation contained in document No. PRO-EST-006 (Rev. 02) dated 15 October 2012 concerning Application of Pesticide. The document has explained the classification of pesticides, procedures for using pesticides, storing pesticides, pesticide poisoning and its symptoms, first aid for pesticide poisoning.

Based on field observations at Block 207 Phase 1, Divisi 1, Senabah Estate, it is known that the company has developed Owls as natural predators of rats. From the observations, it is also known that the Barn Owl is in an active condition as indicated by the loss of feathers, remains of feces and prey bones. From interviews with harvest and maintenance workers, it was found that rats were rare. The results of the FFB grading also did not find any rat bite marks. Based on field observations also did not find chemical control (rat poison application) to anticipate rat control. Based on review of pesticide use documents in 2022, it is known too that there is no use of rodenticides. This means that it is in accordance with the IPM, namely the use of owls for rat control.

Based on interviews with workers in the nursery area, there was no prophylactic use of pesticides. Likewise with the results of field observations that have been recorded at locations of assessment, no prophylactic use of pesticides was found. there is use of

pesticides with the active ingredient chlorantraniliprole, which has been discussed in 7.1.1. Control is carried out based on a census and is only carried out in the main affected areas.

Based on Wilmar's policy (no deforestation, no peat and no exploitation) released on 5 December 2013, it was stated that "The use of pesticides categorized by the World Health Organization (WHO), class 1A or 1B as stated in the Stockholm or Rotterdam conventions will not be used except in certain circumstances or emergency conditions. The use of paraquats is prohibited. Based on Observation results to the agrochemical warehouse in Senabah and Kumpai Estates, it is known that no paraquat stock was found.

7.2.6, 7.2.7, 7.2.9, 7.2.11

Based on field observations and interviews with circle path sprayer workers in Block O38 Phase 4 Senabah Estates and Block 264 Division 1 Kumpai Estates, it is known that workers have received training and have carried out spray techniques according to procedures. Spray training documents for spray workers have been shown, such as in Phase 5 of Kumpai Estate which was held on 17 February 2021. Training on MSDS was also conducted at Kumpai Estate on 22 June 2021 for spray workers and foremen.

Based on interviews, it is known too that workers consist of 12 men and women, and currently there are 7 workers. For female workers, they may not be pregnant and or breastfeeding. If they are pregnant and breastfeeding, then they will be transferred to another job that is not related to pesticides/chemicals. The allowed working age is above 18 years. They can also explain the spray technique according to the OSH procedures and aspects that must be applied at the time of spray application. PPE used appropriate according to recommendations in any risk assessments. appropriate PPE provided and used, and can the PPE be easily replaced if damage. However, based on field observations it is known that the use of PPE is not in its place, the selection of PPE (masks) is not in accordance with SDS, washing and bathing are not in accordance with procedures. Actually, CH has a rinse house that should function as a place for washing PPE and work tools exposed to pesticides, for workers to clean themselves and change into clean clothes after work before going home. However, regarding its use, not all workers use the rinse house according to its function. Based on these matters, it has become NCR 2022.07 in indicator 6.7.3.

Based on interview with workers, it was also known that there was no application of pesticides through the air. If it is necessary to control pests using pesticides, the application is done by spraying using a cap sprayer.

Based on the results of observations of the agrochemical warehouses at Senabah and Kumpai gardens, it was found that pesticide storage had been collected per type of item, contained an MSDS, hazardous materials symbol, and warnings for the use of appropriate PPE. There are also adequate ventilation and lighting.

7.2.8

Based on field observations at the Chemical Warehouse, as well as interviews with operators in each Plantation and Factory, it is known that used pesticide containers will be stored in temporary shelters for Hazardous and Toxic waste which were built with OHS and environmental aspects in mind. The water used for rinsing will be reused as mixing water for chemical activities.

Based on the results of field visits to employee housing areas, it was found that there were no traces of used pesticide packaging, for example as water reservoirs or flower pots.

7.2.10

Based on interviews with workers at the Senabah Plantation, Kumpai Plantation, and the Cooperative, it is known that workers have received cholinesterase examinations in 2021 and 2022. In 2021 the examination was carried out June 29 - July 2, 2021, and recommendations for follow-up from doctors regarding MCU results have been shown which requires follow-up examination. In 2022, CHE inspection for sprayers will be carried out July 14 -25 2022. There are unfit MCU results for Senabah Estate sprayers and require further inspection. Explanation of the company representative, the follow-up inspection plan is being processed by management and currently not employed spray.

Status: Comply

7.3

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

7.3.1

The company shows identification of waste sources for the 2021/2022 period with details: ex sacks of fertilizer, inner plastic of fertilizer

sack, used oil from generator, used neon/lights, wastewater, EFB, Shell, fiber, dash of boiler, domestic waste, paper and others.

Sources of emissions include:

- CO₂ Gas: Transportation of FFB, CPO Shipping, Operation of heavy equipment, operation of generator & electric pumps, management of WTP, boilers, laboratory activities, waste ponds and Mill processes.
- Gas NO₂ & SO₂: Activities in the laboratory.
- Gas CH₄: Fertilizing activities and WWTP ponds.

Hazardous and Toxic waste

Hazardous Waste generated by Estates and Factories will be stored in the Temporary Storage Site of Hazardous Waste owned, then transported by a licensed third party which will then be handed over to a licensed hazardous waste manager. The company already has a permit for Temporary Storage of Hazardous Waste and is still valid for both POM and Estate, namely:

- The company has a permit for hazardous and toxic waste management for the storage of hazardous and toxic materials by PT Agronusa Investama (Ani Estate) with Number 217/PRKPLH/2018 according to the Decree of the Regent of Sambas on April 2, 2018 with a validity period of 5 years. (Kumpai and Senabah Estates)
- The company has a permit for hazardous and toxic waste management for storage activities for hazardous and toxic materials by PT Agronusa Investama (Ani POM) with Number 216/PRKPLH/2018 according to the Decree of the Regent of Sambas on 2 April 2018 with a validity period of 5 years.

In terms of carrying out the transportation of hazardous waste, the company cooperates with a licensed hazardous waste carrier, namely PT Primanru Jaya. The company can show a cooperation agreement with the carrier, namely PT Primanru Jaya with PT Agronusa Investama with Number 002/ANI3-SPK.B3/I/2022 Transportation of B3/I/2022 on January 20, 2022.

The company can show the official report and manifest for the transportation of hazardous waste on January 21, 2022 by the carrier with Vehicle Number B 9073 JXR. The types of hazardous and toxic waste materials submitted are for example:

- Used filter of 0.0519 tons with Manifest KLHK-1647032968
- Used Majun as much as 0.0375 tons with Manifest KLHK-1645919490
- Used packaging of 0.6601 tons of hazardous and toxic materials with Manifest KLHK-1645916366
- 0.076 tons of used battery with Manifest KLHK-1645916566
- 1.6 tons of used oil with Manifest KLHK-1645935373

Solid Waste

The solid waste produced by the company is shell, fiber and EFB. The management plan is carried out by reusing solid waste such as shells and fiber to be reused as boiler fuel. Meanwhile, solid waste such as EFB is reused by applying it to plantation areas. This is evidenced by the results of field visits during the audit activities that the company had used shells and fiber for boiler fuel, while EFB was reused for plantation land.

POME

POME generated from the factory is reused for Land Applications. Before being channeled to LA, POME is first managed at the WWTP with the aim that the quality of the POME flowing to LA is in accordance with the provisions.

Domestic Waste

Domestic waste generated from housing and offices will be disposed of in Landfills. This is evidenced by the results of field visits to landfills that the domestic waste generated will be placed in landfills. In addition, the location of landfills is far from residential areas and water sources.

Based on document verification and the results of field observations, the following evidence were obtained:

- The company already has a waste management plan that is listed in several documents, including:
 1. Fertilizer Application Procedure Number PSKK 03/WIP-KB/(0)/2011 in January 2011 which explains that all empty sacks and

excess fertilizer must be returned to the warehouse for re-counting. If all the sacks have been collected, the foreman must take them to the sack washing area. Inner sacks that have been collected are stored in the Hazardous and Toxic Waste Warehouse.

2. Land Application Procedure Number SOP 27/EHS-ANI/(00)/0919 dated 27 September 2019 which explains that one of the maintenance of the application land is to carry out maintenance/cleaning of flat beds or furrows from palm fronds so that the volume of liquid waste remains in accordance with the dosage and specified rotation.
 3. Residential Solid Waste Management Procedure with SOP Number 13/WIP-KB/(1)/0119 in January 2019 which explains that each employee living in housing provided by the company is required to collect their waste regularly at the provided landfills and cleaning the yard around the house. In addition, it is prohibited to burn waste in any form without the company's permission.
 4. Document identification of factory waste which explains that the management of empty fruit bunches is used for mulch in the Estate.
 5. Procedure for the Management of Hazardous Materials and Hazardous Waste with SOP Number 19/WIP-KB/ (0)/0610 in January 2016 which explains that all hazardous and toxic wastes are stored in a temporary hazardous material waste storage area which is then transferred/transported/used or managed by another party who already has a permit.
 6. Housing Treatment Procedure with SOP Number 73/WIP-KB/(00)/0915 on 1 September 2015 which explains that household domestic waste is channeled into drainage in a well-managed condition.
- The results of observations in the Mill and Estate area of PT ANI obtained the following evidence:
 1. The results of field observations in the Block 65/66 A Land Application area show that there are palm fronds entering the flat bed land application.
 2. The results of field observations in the housing of PKS employees, it is known that there is household solid waste behind the housing drainage channel and it is not placed in the provided trash can.
 3. The results of field observations in the housing of PT ANI's Kumpai unit phase 6 plantation employees found that there was household solid waste behind the housing which was not placed in the trash. In addition, there is a former burning of domestic waste (organic mixed with inorganic) behind the employee housing.
 4. The results of field observations at PT ANI's Kumpai unit phase 6 plantation employee housing revealed that there were former Pertamina oil drums and used motor oil containers behind the housing.
 5. The results of field observations in the Mill area show that there are piles of EFB that are full and have entered the leachate drainage canal. In addition, there are puddles of leachate and the leachate is channeled into drainage channels which are dumped into environmental ditches outside the mill.
 6. The results of observations in the housing area of PT ANI's Kumpai unit phase 6 plantation revealed that there was a pool of household liquid waste and the drainage channel for household liquid waste did not flow and was in a damaged condition.
 7. Based on the results of field observations in the fertilizer activity of block 925 of the Cempaka Biru Cooperative, harvesting activities of block 916 of the Cempaka Biru Cooperative, and block 080 of Kumpai Estates, it is known that there are sacks of fertilizer and inner fertilizer placed in the midrib pile and not in the B3 waste warehouse and sack warehouse. fertilizer.

Based on this evidence, the Company has not been able to demonstrate that the implementation of the waste management plan has been carried out in accordance with its SOP. **Non conformity No. 2022.08 with Minor Category.**

7.3.2

Based on interviews with company management and hazardous waste warehouse officers, it is known that they understand the handling of waste disposal, especially hazardous waste and non-hazardous and toxic waste in accordance with the procedures owned by the management unit. Based on the results of field visits to residential areas, it is known that there is no use of hazardous and toxic waste as a water reservoir.

The company has Fertilizer Application Procedure Number PSKK 03/WIP-KB/(0)/2011 in January 2011 which explains that all empty sacks and excess fertilizer must be returned to the warehouse for re-counting. If all the sacks have been collected, the foreman must take them to the sack washing area. Inner sacks that have been collected are stored in the LB3 Warehouse. The results of interviews with fertilizer employees at the Senabah Estate revealed that workers had an understanding of the inner waste management of fertilizer by collecting and storing it in the LB3 Warehouse. However, the results of interviews with fertilizer employees at the Kumpai Estate revealed that employees did not understand the procedure for managing fertilizer inner waste. The company has the opportunity to ensure that all fertilizer employees understand the understanding of fertilizer inner waste management. (OFI)

7.3.3

Based on field visits to employee housing areas and warehouses, both estates and factories, it is known that each housing has provided a trash bin for domestic waste such as organic and inorganic. Hazardous and toxic waste will be collected in a temporary hazardous waste storage area and there will be no burning of hazardous waste.

7.3.1 | Status: Non conformity No. 2022.08 with Minor Category

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, 7.4.2, 7.4.3, 7.4.4

The CH shows procedures related to the management of soil fertility so that yields are optimal and have minimal impact on the environment, which among others are listed in the document The Agronomic Guidelines Section 3 on oil palm fertilization states that the type of fertilizer, amount and frequency of application is made based on Agronomist recommendations by taking into account the results of leaf analysis and the nutrient status of the trees. Based on field observations at Block 30 J Kumpai Estate, Block 920 Plasma Cempaka Biru, and Block 907B Plasma Sentama Lestari, it is known that fertilization is according to the recommended dosage and is carried out according to fertilization procedures.

The certification unit conducts leaf sampling every year (based on the Agronomy Guidelines for fertilization) and soil every five years (based on a memo from the Kalimantan Barat Regional Research Section on Soil Sampling dated July 7, 2011) as a consideration in calculating annual fertilizer recommendations. The CH conducts leaf tissue analysis regularly that carry out by the Laboratory EMU R&D with test result number 38/BAHAN TANAMAN/IV/2021/ANIS dated April 17, 2021 for a total of 198 samples. The parameters analyzed include N, P, K, Mg, Ca, and B. Meanwhile for the analysis of the soil, with test result number 07/TANAH/IV/2021/ANI dated April 17, 2021 for a number of 18 samples. The parameters analyzed include texture, pH, organic C, Total N, P, and K. Based on the results of the analysis of leaf tissue and soil as material for making fertilizer recommendations.

The CH has carried out a nutrient recycling strategy for both land applications and EFB applications. Based on field observation it is known that a land application has been carried out in Block 65/66 A, Kumpai Estate. Based on document review, it's known that the EFB application in Kumpai Estate for July 2022 is 1,137 mt for 28.4 ha at a dosage of 40 tonnes/ha/year.

The CH explained that all fertilizer recommendations for 2021 had 100 % done, and for 2022 applied ±50%. For example, in Kumpai Estate, fertilization has been realized as much as 577,160 tons of NPK 7 from recommendation 1,130,607 ton. Based on this, it is known that The CH has maintained records of fertilizer use.

Status: Comply

7.5

Practices minimize and control erosion and degradation of soils.

7.5.1

CH shows maps identifying marginal and fragile soils, including steep slopes, that have not changed since the previous audit. Listed in the following documents:

- PT Agronusa Investama's Sandy Marginal Soil map, with a scale of 1: 75,000
- Soil Map Param Agricultural Soil Survey Version, scale 1: 50,000, which among other things describes the existence of peat areas (Ordo Histosols) and sandy areas (Ordo Spodosols) with data sources GIS Database June 2020, Param Agricultural Soil Survey Sdn Bhd May 2008 and Soil Maps Exploration of the Center for Soil and Agro-climate Research in 2000.\
- Topographic maps with a scale of 1: 80,000 dated 30 October 2012 and soil maps resulting from a soil survey study show that the slope conditions vary from flat, undulating and rolling to sandy texture.

7.5.2, 7.5.3

Based on the topographic map described above, it is known that there are no steep slopes, but land with flat, undulating and rolling slopes with a sandy texture. The results of the field visit, there were no new plantings but what was there was replanting. Replanting is carried out on flat and undulating areas, by making terraces and hoofs for areas in need such as Block 26A Phase 3A Senabah Estate.

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, 7.6.3

Based on document review, interviews with management and field observations in Kumpai and Senabah, it is known that there have been no new plantation developments or land clearing. However, the company has carried out replanting activities, as was found in the replanting area of block 27C Senabah Estate.

The unit of certification shows the Soils of PT Agronusa Investama Plantation (ANI) April 2008 Param Agricultural Soil Surveys document, which among other things explains that the existing peat area ranges from shallow to moderate (shallow to medium) with a depth of 50-150 cm and the deep category (deep) that is, with a depth of 150 – 300 cm with a total area of 3,667.3 ha or 43.4%.

Based on the Slope Map of PT. Ani Sambas (ANI Plantation and Farmers), the slope of the land in the plantation area is dominated by flat areas (0-6%) and slightly undulating (6-12%) so there is no management for areas with a certain slope. However, this information is used as a reference for making trenches for water management, especially for the peat management area.

Status: Comply

7.7

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

7.7.1

Based on the results of document review and interviews with management, it is known that no new planting activities have been carried out on peatlands after November 15, 2018 in the existing development area or in the new development area.

7.7.2

The CH has reported the Wilmar Group's peat inventory to RSPO, last June 28 2021 and received a response from RSPO on June 30 2021. Peat inventory reporting is based on PIPPIB, so PT ANI Sambas is not included in the peat area, this is based on the overlay with PIPPIB update 15 February 2021.

on PIPPIB → not available in abbreviations list

7.7.3

The CH has routinely monitored the decrease in peat subsidence. The recording of monitoring of peat subsidence is shown at 13 monitoring points at Kumpai Estate and 5 at Senabah Estate. For example, on the 21st measurement on June 22, 2022 Block 082 B Kumpai Estate recorded a decrease of 2.3 cm. The results of field observations in Block 40 A Senabah Estate and Block 907 C Sentama Lestari Cooperatives, it is known that there is a subsidence pole that is used for monitoring peat soil subsidence.

7.7.4

Based on the results of the document review, it was found that there were no new plantings on peatlands after 15 November 2018 and all peatlands were managed responsibly. The unit of certification shows evidence of the implementation of the water management program.

There are 8 monitoring wells/piezometers for Senabah Estate and 13 units for Kumpai Estate. The unit of certification conducts monitoring on the piezometer on a regular basis once every 2 weeks, such as at location 272 B on the first measurement on August 04 August 2022 with a height of 10 cm. The company also made measurements at 13 Weirs at the Kumpai Estate. For example, in Weirs number 18 it is known that the height is 30 cm from the ground. The results of field observations at Block 907 C Sentama Lestari Cooperatives, it is known that there are weirs and ground water level measuring instruments to monitor water conditions.

7.7.5

The CH has carried out a drainability assessment, which is documented following the RSPO Drainability Assessment Procedure, which is listed in the Drainability Assessment Report of the Kumpai Unit and Senabah Unit June 2020. Based on this document, it is known that the results of the Drainability Assessment in 10 peatlands replanting area that has been carried out provides information that the depth to drainage base is more than peat thickness of the peat - the drainage base is in the mineral soil below the peat - then the drainage limit time does not need to be calculated.

7.7.6

Field observations at Senabah Estate, Kumpai Estate, and Cooperatives revealed that all plantings have been managed in

accordance with applicable laws and RSPO guidelines for best management practices. From the results of field observations, it is known that there has been monitoring of subsidence poles, monitoring of groundwater levels using monitoring wells/piezometers, monitoring of surface water levels in ditches with Weir's treatment as water management. The results of field observations also revealed that the peat blocks were also covered with *Nephrolephis*.

7.7.7

Based on the results of document studies and field observations in Kumpai and Senabah, it is known that all peat areas have been planted. The unit of certification shows the Soils of PT Agronusa Investama Plantation (ANI) April 2008 Param Agricultural Soil Surveys document, which among other things explains that the existing peat area is in the shallow to moderate category with a depth of 50 – 150 cm and a deep category with a depth of 150-300 cm with a total area of 3,667.3 ha or 43.4%.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The company has implemented a water management plan consisting of:

- Do not apply chemicals in river border areas
- Not disposing of liquid waste into rivers but reusing it to plantation land. Before being used, the liquid waste must be managed at the WWTP so that the quality meets the standards set by the government.
- Utilizing water for factory processing in accordance with the standards set by the company.
- Conduct river water quality testing.

The company already has a surface water quality monitoring program that is conducted every semester by a KAN-accredited laboratory (Pontianak Industrial Research and Standardization Testing Laboratory) on February 17, 2022. The monitoring location is on a river for the scope of the company's operational area, namely the Senapit River, the Anas, and the Sentakul River. Currently the company is testing surface water using quality standards that refer to PP 22 of 2021 Class II. The results of the test will then be reported to the relevant Office through the RKL-RPL Report every semester.

There are several tests for environmental parameters such as testing river water which exceeds the PP 22 of 2021 Class II quality standards, namely for COD and PH parameters in the Senapit River, Anas River, and Sentakul River. This is caused by domestic activities and is influenced by peatlands. The company has carried out an evaluation by protecting and maintaining the riparian area by replanting forest trees on the left and right of the river. Based on the results of interviews with the surrounding community, information was also obtained that there was no environmental pollution by the company. In addition, the results of interviews with the Sambas Regency Environmental Service also explained that the company had carried out environmental management and monitoring and reported the results of environmental management and monitoring implementation to the Environmental Office.

The results of observations and interviews with workers show that the company has also provided access to clean water for workers by providing hygienic water for drinking and water for daily needs.

Based on the results of interviews with the Sambas Regency Environmental Service and information from some media online that there is water pollution which is probably related to activities at PT Agronusa Investama.

The company has clarified the matter as follows:

- Minutes of HDPE Land Application Pipe Breaking which contains a chronology of the LA pipe that broke on April 7 2021. The company has made efforts to overcome the pipeline leak by building a dam using a loader in the ditch block 912 B/C on April 8 2021. Company representative (Mill Manager Assistant and EHS) have conducted a search to other blocks and confirmed that there is no waste water flowing into the river body. The company has built blocks in blocks 910, 912 and 913 on April 8 2021. On April 8 2021, the company reported to the Sejangkung Police Chief regarding sabotage of the broken LA pipeline. On April 9, 2021, the Sejangkung Police Chief, the Sambas Police, the Sambas LH Service and the Sambas Village Head together with PKS representatives conducted TKP analysis and surface water sampling according to news that had been spread on social media. The Sambas LH Service conducted sampling at 5 points, namely T01 and T02 with a distance of 300 m and 1200 m from the pipe leak site, the estuary of the Anas River, the upper reaches of the Sambas Besar River, and the downstream of the Sambas Besar River.

- Minutes of Water Sampling dated 9 April 2021 concerning water collection at 5 points which are in the flow from the waste pond water to the meeting point of the Anak tributary with the Sambas Besar River in *Dusun Setambah*, Semanga Village, Sejangkung District.
- Minutes of Mediation between Semanga Village Community Representatives, Sejangkung District, Sambas Regency and PT Agronusa Investama on June 24, 2021 which contains the submission of a request from the Semanga village community representatives to PT ANI to provide compensation and provide rainwater storage (PAH) for 1080 houses and replace loss of livelihood for 1.5 months for 63 fishermen. This has been witnessed by PT Ani, the Semanga Village Head, the Chair of the Semanga Village BPD, and the Sambas Regency Environmental Office.
- Test Results Report from the Pontianak Baristan Testing Laboratory with the results of monitoring surface water quality parameters at the Anas River estuary, upstream of the Great Sambas River, and downstream of the Great Sambas River not exceeding the quality standard stipulated by PP. 22 Year 2021.
- Decree No. S.Tap/53.c/VII/2021/Reskrim issued on July 15, 2021 by the Chief of the Sambas Resort Police regarding the Cessation of Investigation of Information Report No. R-LI/53/IV/2021/Reskrim dated April 8, 2021 on behalf of the reported party PT ANI Estate Kumpai.
- Minutes of Field Verification of follow-up to public complaints conducted on January 5, 2022 by the Environmental Supervisor of the Kalimantan Barat Province Environmental Service (Environmental Investigator) and the Sambas Regency Environmental Service. As a follow-up to the verification results, the company has made improvements in the form of closing Pond No. 1 WWTP and Normalizing (Waste Drainage), making an embankment at the WWTP pool and raising the embankment on the outside of the WWTP pool. The entire follow-up has been completed by the company.

7.8.2

Wet streams in company areas are protected by the company. This is evidenced by the results of field observations in the Senapit River Block 080 area, it is known that the riverbank is protected by the company. Some of the activities carried out by the company are by placing a red mark as a chemical application limit. The results of field observations during the audit activities revealed that there were no river bank areas that were replanted by the company.

The company already has a map of identification of water courses listed on the riparian belt map with a scale of 1: 76,000. Water Course and Wetlands Protected in ACCORDANCE with the RSPO Manual on BMPS for the Management and Rehabilitation of Riparian Revers. This is evidenced based on the results of field observations in the Senapit Block 080 river border area, it is known that river borders are protected by the company. Some of the activities carried out by the company are by installing a red mark as a limit for chemical application.

The results of field observations during the audit activity are known that there is no river border area carried out by a replanting by the company. The company already has SOP for the Protection of the Riparian Zone and Buffer is listed in the Sop of River Border Management with SOP Number 17/WIP-KB/(1)/1015 and SOP for Management of HCV No. SOP 20/WIP-KB/(1)/1015.

7.8.3

Companies can show documents on the results of measuring the quality of liquid waste applied to land, namely documents on the results of testing liquid waste for the period January-June 2022. The test is carried out by a KAN-accredited laboratory (LP-001-IDN) using quality standards referring to Minister of Environment Decree Number 28 2003. Based on the results of the analysis of the test documents, it shows that all the parameters tested are in accordance with the applicable quality standards. As an example of the test results in the February 2022 period with BOD 248 (BM: <5,000) and pH 8.20 (BM: 6-9). In addition, the test results for the December 2021 period showed BOD 308 (BM: <5,000) and pH 8.35 (BM: 6-9).

Permit to dispose of liquid waste for Land Application activities is in accordance with the statement of fulfilling the commitment number: 503/453 / DPMPSTP-3 dated 12 December 2019 and proof of license activation in the OSS system with NIB 8120201931794 print date of 12 December 2019 with a validity period of 5 years.

Based on the results of field observations in the ANI Estate Block 65/66 A Land Application area, it is known that the location of the liquid waste application on the land corresponds to the location stated on the Land Application Permit, apart from that there is no indication of overflow of liquid waste flowing. Observations at WWTP also note that liquid waste has been managed at WWTP, there is a pool to carry out liquid waste management, there are no indications of leakage and overflow in the WWTP pool and a flow meter to calculate the amount of liquid waste flowing into the application land is available and functioning properly.

The auditor team has also verified OFI on previous assessments related to the Flow Meter not functioning. The results of the audit team's verification revealed that the Flow Meter in the WWTP pool has been functioning properly and the officer has also recorded every POME that is flowed to the Land Application.

Is the mill effluent treatment process in place?

7.8.4

Companies can show the results of water usage recapitulation for the January-July 2022 period, namely:

The use of water for processing FFB is 96,699 m3 with an average monthly use of water for processing FFB of 13,814 m3 or 1.36 M3/ton FFB. The data shows that the company uses surface water that is in accordance with the quota set by the company, which is 1.50 m3/ton FFB.

Water Resources Exploitation Permit in accordance with the Decree of the Head of Investment and One Stop Services Office of Kalimantan Barat Province Number 503/05/SDA/DPMPSTSP-C.I/2021 concerning Granting of PT Agronusa Investama's Water Resources Concession Permit in Sambas Regency on 17 May 2021 with a validity period of 5 years with a permitted water withdrawal quota of 60,000 m3/month.

Status: Comply

7.9

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

7.9.1

The plan to increase the efficiency of the use of fossil fuels and optimize the use of renewable energy by the company is to use shells and fiber as boiler fuel which is used to generate turbines to generate electricity. The use of energy generated from the turbine is monitored every day.

ANI POM has an Energy efficiency document in 2022 for the use of fossil fuels or the use of renewable fuels. The calculation of efficiency with the use of fossil fuels during 2022 (January-July) is concluded as follows:

FFB Processed as much as 106,951.35 tons using renewable fuels such as shells of 2,632.24 tons and 13,033.16 tons of Fiber. The turbine produced from the use of Shell and Fiber is 1,252,540 Kwh or 11.51 Kwh/Ton FFB, while the generator used is 252.136 Kwh. The efficiency of renewable energy used by the company is 83.04%.

Status: Comply

7.10

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

7.10.1

The company also has conducted GHG emission calculations period 2021 use of Calculator Palm GHG version 4.0. Accurate data has been put into the RSPO PalmGHG Calculator (Palm GHG version 4.0) and has been verified. Summary of net GHG emissions from PalmGHG calculator of the audit report which calculation option is applied "Apply full Version".

Summary of Net GHG Emissions

Emission per product	tCO2e/tProduct
CPO	0.36
PK	0.36

Production	t/yr
FFB processed	200,905.55
CPO produced	41512.29
PK produced	9529.89

Extraction	%
OER	20.66
KER	4.74

Land use	Ha

Planted area on mineral	10159.67
Planted on peat	145.37
Total area planted	10305.04
Conservation Area (Forested)	119.28
Conservation Area (Non-Forested)	13.17
FFB Production per hectare	19.80

Summary of field emission and Sinks

Description	Own crop		Group		3 rd Party	Total
	tCO2e	tCO2e/ tFFB	tCO2e	tCO2e/ tFFB		
Emissions Sources						
Land conversion	60981.91	0.52	18460.04	1.09	9675.78	89117.73
CO2 emissions from fertilizer	9427.67	0.08	1083.02	0.06	204.03	10714.72
NO2 emissions from peat	0.00	0.00	1088.43	0.06	0.00	1088.43
NO2 from Fertilizer	5525.70	0.05	765.29	0.05	135.05	6426.03
Fuel consumption	2932.47	0.03	270.95	0.02	11.09	3214.51
Peat oxidation	0.00	0.00	7938.84	0.47	0.00	7938.84
Sinks						
Crop sequestration	-69286.11	-0.59	-10832.84	-0.64	-11820.09	-130621.95
Sequestration in Conservation area	-1093.80	-0.15	0.00	0.00	0.00	-10118.08
Total	8487.84	0.07	18773.72	1.11	2047.62	29309.18

Summary Oil Mill Emissions and Credits

Remarks	tCO2e	tCO2e/t FFB
Emissions sources		
POME	0.00	0.00
Fuel consumption	551.99	0.00
Grid electricity	0.00	0.00
Credits		
Export of grid electricity	0.00	0.00
Sales of PKS	-11653.74	0.06
Sales of EFB	0.00	0.00
Total	-11101.75	-0.06

Palm Oil Mill Effluent (POME) Treatment

Divert to compost (%)	0
Divert to anaerobic digestion (%)	100

POME Divert to Anaerobic Digestion

Divert to anaerobic pond (%)	100
Divert to methane capture (flaring) (%)	0
Divert to methane capture (electricity generation) (%)	0

The auditor team has verified the palm GHG carried out by the company. Based on the results of the verification, it is known that the palm GHG input data is in accordance with the actual conditions. This is evidenced by the results of verification of the amount of FFB production, FFB Process and the area of HCV for the scope of certification. GHG emissions in 2021 will be lower than in 2020. This is due to the lower use of fertilizers in 2021, and lower processed FFB than the previous year.

All emission sources have been identified by companies such as from the use of fertilizers, fuel use, use of pesticides, processing of FFB, etc. Planning to reduce pollutants carried out by the company include:

- Monitor air quality and emissions from boilers and generators
- Carry out the management of liquid waste in WWTPS before use on plantations
- Perform ordinary machine maintenance.
- Optimizing the use of fertilizer according to recommendations
- Use of fiber and shells in Mill to reduce diesel fuel.

7.10.2

The management unit has not developed new areas since 2014.

7.10.3

Based on document review and interviews with company representatives, it was found that there were no new developments. The company has identified the source of pollution in the mill and estate, the document informs the source (station/activity), source of pollution and emission, impact (human, work equipment, environment) and impact control. For example, from the boiler it produces boiler ash, steam and chemical pollution, from the engine room it produces pollution in the form of noise.

Efforts to reduce pollutants carried out by the company include:

- Monitoring air quality and emissions from boilers and generators
- Carry out liquid waste management in WWTPs before being used in plantations
- Perform regular machine maintenance.
- Optimizing the use of fertilizers according to recommendations
- Use of fiber and shells in PKS to reduce diesel fuel.

The company has conducted emission tests from boilers and generators, as well as ambient air quality which will be carried out in semester 1 of 2022 by a KAN-accredited laboratory (LP-001-IDN). Based on the results of the document review, it is known that the results of the tests carried out are in accordance with the provisions stipulated by the Government.

Status: Comply

7.11

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

7.11.1

The company has shown Wilmar's Policy "No deforestation, No peat, No exploitation" on 15 November 2019. In this policy, there is a prohibition on burning which intends not to use fire in opening new plantations or replanting or other development which is written in this policy. The company already has adequate firefighting equipment and is in accordance with the provisions in Indonesia. In addition, the company also has an emergency response team to handle fire emergencies. The company already has an emergency response team for each factory and estate.

Based on the results of field observations during the audit activities, it was found that there were no indications of former land burning by the company.

7.11.2

In determining land fire prevention and control measures, the company carries out several activities, namely:

- Fire emergency response simulation training for employees, for example on 4 February 2022 and 28 March 2022 which was attended by the Estate and Mill Fire Task Force.
- The company has an emergency response team to handle fire emergencies. The company already has an emergency response team for every estate and factory.
- Have facilities and infrastructure for emergency response prevention and management of land fires.
- Socializing land fires to the surrounding community, for example on March 10, 2022, which was attended by 14 communities around the company.
- Monitoring land fires through fire patrols and through fire towers and drones that are carried out every day. For example, the results of fire monitoring for the April 2022 period revealed that there were no hotspots in the company area.

The auditor team has also conducted fire control simulations on the fire task force team at the ANI Estate and tested the company's

fire control facilities and infrastructure. The simulation results show that the Company's fire task force team can run the simulation well and firefighting equipment can be used at any time.

7.11.3

The company has made efforts to involve stakeholders in adjoining locations for fire prevention and control measures. For example, the company has attached the Minutes of Socialization of HCV and Karhutla to the Community which was conducted on March 10, 2022 which involved 14 participants including representatives of KSU Sentama Lestari, Kades Sepantai, Community leaders (Beringin, Sabung Sanggar, etc.), cooperative management, Government Village.

The results of interviews with representatives of the village community around the company, namely Beringin Village, found that the company had socialized fire control to the community. Apart from that, in the company area there is also a signboard prohibiting land burning activities and the danger of land fires.

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

The management unit can show the LUCA documents that have been received by the RSPO. From the documents shown, it is known that for the scope of certification there was an opening above 2005 with an area of raw liability of 2,468.01 ha. As for the whole raw liability, none of them were subject to conservation liability/0 Ha. The management unit is subject to the obligation to carry out remediation in the riparian zone area of 26.56 ha.

7.12.2

The company in collaboration with MEC Malaysia has identified the High Conservation Value (HCV) Assessment, March 2011 with a total area of 453.45 Ha.

The MEC HCV Assessment 2011 shows the HCV area in detail:

No	Element HCV	HCV type		Area (Ha)
		Non Riparian	Riparian	
1	HCV 3	111.82		111.82
2	HCV 3; 4.1	-	243.12	243.12
3	HCV 3; 4.1; 5	-	90.12	90.12
4	HCV 4.1;5	-	8.39	8.39
	Total	111.82	341.63	453.45

The company overlaid the HCV area with a new Cadastral in July 2018, namely:

No	Element HCV	HCV type		Area (Ha)
		Non Riparian	Non Riparian	
1	HCV 3	0.94	0	0.94
2	HCV 3; 4.1	0	60.87	60.87
	Total	0.94	60.87	61.81

The company determines the actual HCV area as a result of remeasurement in 2020:

No	Element HCV	Kumpai	Senabah	Cempaka Biru	Sentama Lestari
1	HCV 3; 4.1	21.97	27.44	5.12	3.66
	Total	58.19			

In the High Conservation Value (HCV) identification document carried out by MEC, March 2011, the list of fauna is Birds, Mamals, Amphibians and Reptiles, and Fishes.

The company has also identified the types of animals and plants at PT Ani Sambas in March 2014 by Internal Wilmar. There is 1 bird

species with Least Concern status based on IUCN, 2 bird species with Appendix II status based on CITES, and 12 bird species with protected status based on Government Regulation No. 7 of 1999. There are 8 types of mammals with Least Concern status based on IUCN, 2 types of Vulnerable status based on IUCN, 4 types of Appendix II status based on CITES, and 2 types of protected status based on PP. No. 7 of 1999. There are 7 species of Amphibians and Reptiles with Least Concern status based on IUCN, 3 types of Appendix II status based on CITES, and no protected species under Government Regulation No. 7 of 1999.

Identification of HCVs, MEC uses several references to identify HCV areas, namely: (1) The High Conservation Value Forest Toolkit (ProForest, 2003) (2) Guidelines for Identification of High Conservation Value Areas in Indonesia (Revision of HCV Toolkit Indonesia, 2008).

Based on the results of document verification, it is known that the company did not develop new land after 2018. The year of planting above 2018 was a replanting area so the company had no obligation to carry out an HCS assessment.

7.12.3

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

7.12.4

The company has an HCV Management Plan for the 2021-2025 period which was updated on February 3, 2021 based on the results of a review of the 2016-2020 HCV Management Plan which has been developed in consultation with stakeholders such as the surrounding community and employees. The plan contains management plans, monitoring, timelines and the person in charge of implementation. The HCV management matrix explains that the management plan consists of:

- Outreach to employees and the community about HCV
- Installation and maintenance of posters on HCV and protected flora and fauna every 3 months
- Conduct flora and fauna survey using existing transects and routes every 1 year.
- Making boundary markers according to riparian SOPs and maintaining SOPs every 3 months.
- Sampling of water every 6 months.
- Do not apply chemical treatment (spray and fertilizer) and do not plant in riparian areas during replanting.
- Plant enrichment in open riparian areas with local plant species (nursery).

The integrated management plan has been developed in consultation with relevant stakeholders and includes both directly managed areas and broader and relevant landscape level considerations. This is evidenced by the company's HCV management plan which was developed by involving stakeholders such as the surrounding village community and employees. Management activities planned by the company also cover areas that are managed directly and take into account the wider landscape such as maintaining the existence of HCV (Sungai Senapit), anticipating land fires in the company area and in the area around the company, increasing employee and community knowledge by conducting HCV socialization.

Based on document verification and the results of field observations, the following evidences were obtained:

- The company has an HCV Management Plan for the 2021-2025 period which was updated on 3 February 2021 based on the results of a review of the HCV Management Plan for the 2016-2020 period. For example, the management plan for HCV 4 is carried out by making riparian boundary markings along both sides of the river, no chemical treatment either spraying or fertilizing.
- Reports on the results of HCV monitoring carried out by the company obtained the following information:
 - a) On November 10 2021 at the Senabah Estate it was discovered that there was spraying on the River Border in Blocks 26B, 220E, 20 A, 28 B, 29A, 14 C and 14 D.
 - b) On March 30 2022 at the Kumpai Estate it was discovered that there was trash in the HCV/River in Block 026.
 - c) On April 29 2022 it was discovered at the Kumpai Estate that there were no HCV Signs on the River Border in Block 918.
 - d) On 24 May 2022 at the Kumpai Estate it was discovered that there was spraying on the River Border in Block 918.
 - e) On 27 June 2022 at the Kumpai Estate it was discovered that there was spraying on the River Border in Block 188.
- Then the results of field observations at the Cempaka Biru Cooperative Block 918 found that there were traces of pesticide application on the riverbank which is an HCV area. In addition, in the riparian section there is only a riparian boundary on one side.

Based on this evidence, the Company has not been able to prove that the HCVs that have been identified, protected, and/or enhanced

and the implementation of the HCV management plan are in accordance with the 2021-2025 HCV management plan. **Non conformity No. 2022.09 with Major Category.**

7.12.5

Document studies and interviews with local communities in surrounding villages obtained information that there was no local community land within the company's operational area.

7.12.6

The company has a program to educate the workforce about RTE species status. The program is also included in the Company's HCV management plan. The program includes activities to increase knowledge and skills (for all staff and plantation employees, especially special officers in charge of managing HCV/HCV and monitoring important species, especially endangered species.

The company routinely conducts socialization to the community and workers in the company regarding the existence of endangered plants and animals, which is carried out in conjunction with the socialization of HCV areas, for example:

- Minutes of HCV outreach including the presence of important species which was carried out on 22 January 2022 to 57 participants.
- Minutes of socialization of HCV and important species which was carried out on 30 December 2021 which was attended by 37 local communities.

Based on the results of interviews with harvest and spraying officers at Cempaka Biru and ANI Estate, it is known that the company prohibits workers from keeping protected animals and plants and is prohibited from catching, hunting and killing animals as well as destroying HCV areas.

7.12.7

Based on document verification, the following evidence was obtained:

- Reports on the results of HCV monitoring carried out by the company obtained the following information:
 1. On November 10 2021 at the Senabah Estate it was discovered that there was spraying on the River Border in Blocks 26B, 220E, 20 A, 28 B, 29A, 14 C and 14 D.
 2. On March 30 2022 at the Kumpai Estate it was discovered that there was trash in the HCV/River in Block 026.
 3. On April 29 2022 it was discovered at the Kumpai Estate that there were no HCV Signs on the River Border in Block 918.
 4. On 24 May 2022 at the Kumpai Estate it was discovered that there was spraying on the River Border in Block 918.
 5. On 27 June 2022 at the Kumpai Estate it was discovered that there was spraying on the River Border in Block 188.
- The company has an HCV Management Plan for the 2021-2025 period which was updated on 3 February 2021 based on the results of a review of the HCV Management Plan for the 2016-2020 period. For example, the management plan for HCV 4 is carried out by making riparian boundary markings along both sides of the river, no chemical treatment either spraying or fertilizing.
- The 2021-2025 HCV Management Plan Realization & Program Report which explains the evaluation of the results of the management plan realization activities. The results of the evaluation are as follows:
 1. Continuous installation and maintenance of HCV signs
 2. Addition of riparian boundary stakes to replace missing or damaged stakes.
 3. Planting riparian trees so that they can become animal corridors.
 4. Enrichment of the types of plants that are seeded.
 5. Number of nursery stock added.However, there has been no evaluation of the results of the HCV monitoring carried out regarding the spraying on the riverbanks.
- Then, based on the verification of the 2021-2025 HCV Realization Report & Program Management Plan documents, no follow-up was carried out on the results of the evaluation.

Based on this evidence, the Company has not been able to prove that the results of HCV monitoring have been used to follow up on improving the management plan. **Non conformity No. 2022.10 with Minor Category.**

7.12.8

The management unit can show the LUCA documents that have been received by the RSPO. From the documents shown, it is known that for the scope of certification there was an opening above 2005 with an area of raw liability of 2,468.01 ha. As for the whole raw liability, no one was subject to conservation liability/0 Ha. The management unit is subject to the obligation to carry out remediation in

the riparian zone area of 26.56 ha.

The company has shown the results of communication with RSPO on 8 October 2017 regarding LUCA for plasma at PT ANIS Kalimantan Barat. Then, RSPO (Khing Su Li) responded to the email on 9 October 2018 with the answer, "Acknowledge receipt and we will go through the documentations. We will get back to you should have questions." Based on the results of a document review and interviews with management, there have been no inquiries from the RSPO to date and the LUCA has been deemed accepted.

Based on the results of document review and interviews with management, until the 1.2 surveillance audit was carried out, the company was still in the process of finalizing the RaCP proposal and would be sent to the RSPO at the end of November 2021.

The company can show approval of the Remediation Plan of PT Bumi Pratama Khatulistiwa and PT Agronusa Investama-Sambas from the RSPO (kasihputri@rspo.org) on 26 July 2022 that The Remediation Plan is endorsed with 26.56 Ha of riparian remediation and 2,611.44 Ha of peat remediation.

7.12.4	Status: Non conformity No. 2022.09 with Major Category	
7.12.7	Status: Non conformity No. 2022.10 with Minor Category	

3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or ✓
ASA-1.3	PT Agronusa Investama did not use RSPO trademark and CB Logo.	✓
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or ✓
ASA-1.3	PT Agronusa Investama did not use RSPO trademark and CB Logo.	✓
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or ✓
ASA-1.3	PT Agronusa Investama did not use RSPO trademark and CB Logo.	✓
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or ✓
ASA-1.3	PT Agronusa Investama did not use RSPO trademark and CB Logo.	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

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

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

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

MUTU Auditor has verified company partial certification and concludes that:

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

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

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
	7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p>possible corporate improprieties. This Policy ensures that arrangements are in place for independent investigations of alleged improprieties and for appropriate follow-up actions as link below; https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/wilmar-whistleblowing-policy.pdf</p> <p>This grievance procedure is open to all stakeholders, though is primarily focused on receiving grievances from external sources. For workers and local communities with specific local level grievances, each of our plantation and mill operational units have site specific complaints and grievances procedures, which have been a requirement of the RSPO Principles and Criteria since 2005. These site-specific procedures are accessible by workers and to any other stakeholder. Grievances raised through the site-specific procedures have a separate resolution process - Consultation and Communication Procedure. The SOP also available in website link as below; https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/grievance/grievance-sop/grievance-procedure_final.pdf?sfvrsn=7670cea2_2</p> <p>The internal audit documentation for uncertified areas were observed and it is confirmed that there were no land conflicts.</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p>The group has Dispute & Resolution Procedure Doc No PPB/RSPO 6.3 (2.2)/(1) revision date 25 Oct 2018 purpose to facilitate a dispute and grievances resolution process between the management, growers and miller and employees, local communities and other affected external parties.</p> <p>The internal audit documentation for uncertified areas were observed and it is confirmed that there were no land conflicts.</p> <p>There are no reports of legal disputes at the time of reporting.</p> <p>The internal audit documentation for uncertified areas were observed and it is confirmed that there were no labour disputes.</p>
2.1.6	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1 (it has changed be Criterion 4.2 in P&C 2018).	<p>The internal audit procedure doc no PBB/PRO 12/(03)/0212 revision 23 March 2020 (Rev 4) conducted periodically for uncertified and certified area and result of internal audit for uncertified areas were observed and it is confirmed that all laws are in compliance.</p>

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

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

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

NCR No.	:		Issued by	:	
Date Issued	:		Time Limit	:	
NC Grade	:		Date of Closing	:	
Standard Ref. & Requirement	:				
Evidence observed (filled by auditor):					
Non-Conformance Description (filled by auditor):					
<i>There is no Non-conformity during Surveillance-1.2 assessment.</i>					
Root Cause Analysis (filled by organization audited):					
Correction (filled by organization audited):					
Corrective Action (filled by organization audited):					
Assessor Evaluation and Conclusion (filled by auditor):					
Verified by	:				

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA 1.3 Audit

NCR No.	: 2022.01	Issued by	: Afiffuddin
Date Issued	: 13 August 2022	Time Limit	: 11 November 2022
NC Grade	: Major	Date of Closing	: 20 October 2022
Standard Ref. & Requirement	1.1.3 Records of requests for information and responses are maintained		
<p>Evidence observed (filled by auditor): Based on the results of a document review, interviews with representatives of the <i>Serikat Pekerja Pejuang Lintas Khatulistiwa</i> (PELIKHA) and the <i>Serikat Buruh Kerakyatan</i> (SERBUK) and interviews with management, the following evidence was found:</p> <ul style="list-style-type: none"> Based on the results of interviews with the PELIKHA and SERBUK Worker Union, it was stated that the Workers' Union had sent a letter requesting the holding of Collective Labour Agreement (CLA) negotiations on April 1, 2022, because the CLA will expire on September 30, 2022. Letter from PELIKHA No. 01/SP-PELIKHA/PUK/IV/2022 dated 01 April 2022 and Letter from the SERBUK Worker Union No. 001/SBK-SBS/IV/2022, dated 01 April 2022, regarding the Request for the Holding of CLA Negotiations between POM – PT ANI 3 Kumpai and PUK PELIKHA Worker Union PT ANI 3 Kumpai and SERBUK POM ANI III Kumpai. Letter from PT Agronusa Investama, number 266/ANI-EXT/VIII/2022, dated 11 August 2022, regarding PT Agronusa Investama PKS's request for PT Agronusa Investama PKS negotiations, which stated that they are willing to carry out negotiations starting on 15 September 2022. The letter was received by SERBUK and PELIKHA parties on 12 August 2022. Procedure for Providing Information to Outside Parties (Transparency), document number SOP 52/WIP-KB/(02)/0911, Revision 2, effective date 01 October 2015, which among other things states that "The Company will respond to requests at the latest within 14 days after the request is received. Based on the explanation above, it is known that the response to incoming letters from the PELIKHA and SERBUK unions by the company is 134 days. 			
<p>Non-Conformance Description (filled by auditor)</p> <p>Based on the explanation above, it is known that there are responses to stakeholders beyond the timeframe in responding to requests for information that have been stipulated in company procedures.</p>			
<p>Root Cause Analysis (filled by organization audited):</p> <ul style="list-style-type: none"> Lack of outreach to all PICs regarding understanding of the implementation of this Procedure for Providing Information to Outside Parties A special PIC has not been appointed to monitor the logbook to ensure that the complaint handling process runs according to the timetable set out in the Procedure 			
<p>Correction (filled by organization audited): Checking back into the logbook, and providing answers to incoming letters requesting information that is still pending (if any)</p>			
<p>Corrective Action (filled by organization audited):</p> <ul style="list-style-type: none"> Outreach to all PICs on the contents of Procedure SOP 52/WIP-KB/(02)/0911 Appointment as PIC who monitors the logbook and ensures the timely handling of requests for information in accordance with procedures Periodic evaluation of the performance of handling requests for information during a management review looking at performance statistics in the form of a comparison of inputs and responses that have/have not been given as well as discussion of unresolved inputs 			
<p>Assessor Evaluation and Conclusion (filled by auditor): Auditor verification dated 23 September 2022</p>			

The company has completed Root Cause Analysis, Correction and Corrective Action.
For Root Cause Analysis has been acceptable.

Auditor verification dated 05 October 2022

The company shows evidence of improvement in the form of:

1. Minutes of Socialization of SOP for Providing Information to Outsiders (Transparency), dated 30 August 2022, which was attended by 25 participants consisting of Managers, Staff and Office Employees.
2. Internal Memorandum of PT ANI Sambas, number 001/ANI-SMBS/IX/2022 from Estate Manager Kumpai and number 001/ANI-S/09/2022 from Estate Manager Senabah, dated 01 September 2022, which among other things states the PIC in charge of carrying out the recording of incoming and outgoing letters is from the PGA (Personal General Affair) which then distributes letters to the intended PIC to provide a response after obtaining approval from the unit head. The PIC appointed to provide a response, must respond regarding the incoming letter no later than 14 days after the letter is received in accordance with the provisions in SOP 52/WIP-KB/(02)/0911, Revision 2, concerning Provision of Information to Outsiders (Transparency). The PIC appointed to record incoming and outgoing letters is obliged to remind the PIC appointed to respond to incoming letters if at least 10 days after the letter is received there has been no response or response recorded in the log book of incoming and outgoing letters
3. Letter of Appointment number 001/PGA/PKS-ANI/IX/2022 concerning Determination of PIC of Incoming and Outgoing Letters at PKS – PT Agronusa Investama Sambas, dated 07 September 2022, which stipulates that the PIC of incoming and outgoing letters is FAW (worker's initials).

Auditor verification dated October 20, 2022

The company shows evidence of improvement as follows:

1. Incoming letter from the SERBUK PT ANI to the PT ANI Company Management, dated August 19, 2022 regarding the application for a Work Dispensation for the Chairman of the SERBUK PT ANI, August 26-30 2022. Response letter from the PT ANI Management regarding the letter from the SERBUK PT ANI, August 23, 2022.
2. Incoming letter from the Kalimantan Barat Regional Committee SERBUK to the Company Management of PT ANI, dated 24 August 2022 regarding Notification of the Work Visit of the Kalimantan Barat Regional Committee of the SERBUK, 01 – 10 September 2022. Response letter from the Management of PT ANI regarding the letter from Kalimantan Barat Regional Committee of the SERBUK, August 31, 2022.
3. Incoming letter from the Kalimantan Barat Regional Committee SERBUK to the Company Management of PT ANI, dated September 1, 2022 regarding Notification of the Work Visit of the Kalimantan Barat Regional Committee of the SERBUK, September 5 – 10, 2022. Response letter from the Management of PT ANI regarding the letter from Committee for the Kalimantan Barat Regional Labor Union, September 3, 2022.
4. Incoming letter from the SERBUK PT ANI to the PT ANI Company Management, September 9, 2022 regarding the application for a Work Dispensation for 1 member of the SERBUK PT ANI, September 15-20 2022. Response letter from the PT ANI Management regarding the letter from the SERBUK PT ANI, September 12, 2022.
5. Incoming letter from the SERBUK PT ANI to PT ANI Company Management, dated October 1, 2022 regarding the application for a Work Permit Dispensation for representatives of the management and members of the SERBUK PT ANI, October 6, 2022. Response letter from PT ANI Management regarding the letter from SERBUK PT ANI, October 3, 2022.
6. Incoming letter from the Central Statistics Agency of Sambas Regency to the Management of PT ANI, dated October 13, 2022 regarding the application for an initial data collection permit for social economic registration in 2022. Response letter from the Management of PT ANI regarding the letter from the Central Statistics Agency of Sambas Regency, dated 18 October 2022.
7. Logbook documentation of incoming and outgoing letters for the period August – October 2022, which includes the date of receipt of the letter, number of letter, date of letter, date of response, origin of letter, subject matter, description and others. Based on these documents, it is known that there are 12 incoming and outgoing letters that have been responded to in accordance with the Procedure for Providing Information to Outside Parties.
8. PT ANI's Management Review Minutes Draft, which among other things scheduled a discussion regarding evaluation of the performance of handling incoming and outgoing letters from stakeholders.

Based on the analysis of the root causes submitted, the evidence of improvement shown and the preventive actions taken, the non-conformity of this indicator is declared **comply** and the consistency will be observed again in the next assessment.

Afiffuddin	:	Afiffuddin
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NCR No.	: 2022.02	Issued by	: Rahmat Abdiansyah
Date Issued	: 13 August 2022	Time Limit	: ASA 1.4
NC Grade	: Minor	Date of Closing	: -
Standard Ref. & Requirement	3.4.2 For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.		
Evidence observed (filled by auditor): <u>Environmental Impact Assessment</u> <ul style="list-style-type: none"> The company has an Environmental Impact Analysis Document (AMDAL) conducted in December 2000 with a Study Area of ±15,000 Ha and a Factory Capacity of 60 Tons FFB/Hour. The activities studied are: Activities in the Pre-Construction stage include the Land Acquisition Process. Construction phase activities include land clearing, logging, construction of roads and employee houses, construction of terraces and drainage canals, nurseries, piling and making planting holes and planting. Post-construction activities include plant maintenance, fertilization, pest and weed control, FFB harvesting, FFB transportation and oil palm processing in the PKS. The results of field observations at Block 27 Phase 3A of the Senabah unit are known that in 2021 and 2022 the company has carried out replanting. In addition, based on the results of the document review, it is also known that the company has carried out replanting activities from 2019-2021. However, the company has not yet been able to demonstrate an environmental impact assessment of the replanting activities. <u>Social Impact Assessment</u> <ul style="list-style-type: none"> The company has conducted a social impact assessment in March 2011 conducted by The Indonesian Resource Institute. In this document it is known that there has not been an assessment of the social impact of the replanting activity. The results of field observations in Block 27 Phase 3A of the Senabah unit show that in 2021 and 2022 the company has carried out replanting. In addition, based on the results of the document review, it is also known that the company has carried out replanting activities starting in 2019-2021. However, the company has not been able to show a social impact assessment from replanting activities. <u>Social Management and Monitoring Plan</u> <ul style="list-style-type: none"> The company already has an SIA management plan for 2021-2022 which was developed with the participation of stakeholders such as the people of Semanga Village, Sepantai Village, Sabung Village, and Beringin Village, Plasma Cooperative Management, Employees, and Trade Unions whose data was collected on 8-22 July 2021 with interviews and FGDs. The SIA management plan includes: <ol style="list-style-type: none"> Handling Mill Waste and River Pollution by Pesticides Consultation and communication CSR Land conflicts Employment Recruitment Work Facilities (no harvest points, water motorbike costs, work job desks, and class status) Plasma OHS Based on the results of interviews with workers and community representatives from Semanga and Beringin Villages as well as field observations, it is known that there are currently developing social issues and these issues have not been covered in the SIA management plan for the period 2021-2022 such as the issue of replanting, complaint mechanisms, and worker facilities related to housing and housing conditions (drainage channels). The results of interviews with company representatives found that in preparing the AIS management plan the company involved community representatives, representatives of Plasma Smallholders, and representatives of employees who were considered to be key stakeholders. However, based on the results of interviews with representatives of the Semanga Village community who were not involved in preparing the SIA plan, it is known that there are villagers who have asked questions regarding replanting 			

activities carried out by the company while the company's HGU has not yet been issued. This issue has also been published in online news.

Non-Conformance Description (filled by auditor):

Social and Environmental Impact Assessment

The company has not been able to show an environmental and social impact assessment of the replanting activities that have been carried out.

Social Impact Management Plan

- The company has not been able to show that its social impact management and monitoring plan has covered all developing social issues
- The preparation of a social impact management plan that is carried out in a participatory manner does not represent all affected stakeholders.

Root Cause Analysis (filled by organization audited):

- Periodic review and evaluation of environmental and social management/monitoring plans (RKL-RPL & SIA) is not yet optimal to respond to existing operational changes. This is also related to the technical capabilities of the PIC concerned.
- There is no proper identification of stakeholder representation before conducting a joint review.

Correction (filled by organization audited):

- Identify environmental and social impact aspects of replanting activities
- Create a management plan and monitor environmental and social issues related to replanting, complaint mechanisms, and worker facilities related to housing and housing conditions (drainage channels)
- Consult points 1 and 2 to affected stakeholders

Corrective Action (filled by organization audited):

- Conduct regular review and evaluation training on environmental and social management/monitoring plans (RKL-RPL & SIA)
- Create social monitoring SOP

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification September 22, 2022

The company has sent evidence of improvements in the form of root cause analysis, corrections, and corrective actions that have been identified. However, the company must also show evidence of the results of the implementation of the Correction and Corrective Action carried out. Based on this explanation, the discrepancy in this indicator is declared Unfulfilled.

Auditor Verification September 30, 2022

The company has sent evidence of improvements in the form of root cause analysis, corrections, and corrective actions that have been identified. However, the company must also show evidence of the results of the implementation of the Correction and Corrective Action carried out. Based on this explanation, the discrepancy in this indicator is declared Unfulfilled.

Verified by : Rahmat Abdiansyah

NCR No.	: 2022.03	Issued by	: Rahmat Abdiansyah
Date Issued	: 13 August 2022	Time Limit	: 11 November 2022
NC Grade	: Major	Date of Closing	: 24 October 2022

Standard Ref. & Requirement	: 3.4.3 The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.
Evidence observed (filled by auditor):	
<ul style="list-style-type: none"> • The company already has an SIA management plan for 2021-2022 which was developed with the participation of stakeholders such as the people of Semanga Village, Sepantai Village, Sabung Village, and Beringin Village, Plasma Cooperative Management, Employees, and Trade Unions whose data was collected on 8-22 July 2021 with interviews and FGDs. The SIA management plan includes: <ol style="list-style-type: none"> 1. Handling Mill Waste and River Pollution by Pesticides 2. Consultation and communication 3. CSR 4. Land conflicts 5. Employment Recruitment 6. Work Facilities (no harvest points, water motorbike costs, work job desks, and class status) 7. Plasma 8. OHS • The company has implemented a social impact management plan, including: <ol style="list-style-type: none"> 1. Handling Mill Waste and Pollution of rivers by pesticides by testing liquid waste, carrying out chemical activities according to SOPs, not carrying out chemical activities in riparian areas. 2. Consultation and communication regarding FFB prices by socializing FFB pricing to FFB suppliers (vendors). Socialization has not been carried out for independent farmers. 3. CSR by compiling a CSR program. 4. Occupational Safety and Health by providing PPE and Safety Patrol. • From the results of social impact management carried out, the company has not been able to show the results of its monitoring to evaluate the effectiveness of the management activities carried out. • The results of field observations and interviews with the auditor team with village communities and company employees found that the implementation of social impact management has not been able to mitigate developing social issues, namely: <ol style="list-style-type: none"> 1. The results of field observations in the HCV area Block 918 of the Cempaka Biru Cooperative note that there are traces of pesticide application on the riverbank which is an HCV area. 2. The results of interviews with representatives of the Semanga Village community revealed that there were social issues related to differences in FFB pricing between suppliers set by the company. 3. The results of interviews with representatives of the Semanga Village community stated that the community did not know about the company's CSR program and instead questioned PT ANI's CSR. 	
Non-Conformance Description (filled by auditor):	
<p>The Company has not been able to show evidence of social impact management that has been carried out and has been monitored to be able to prove that the management carried out can mitigate developing social issues</p>	
Root Cause Analysis (filled by organization audited):	
<p>There is no evaluation yet to ensure the effectiveness of the monitoring plan in monitoring the implemented management plan</p>	
Correction (filled by organization audited):	
<ul style="list-style-type: none"> - Added riparian boundary markers in the Cempaka Biru plasma river border area - Re-socialization to spray employees who work in the Cempaka Biru plasma regarding the maintenance of the river border area - Consultation with village communities regarding the pattern of the CSR program in stages - Communication to FFB supplying agents regarding FFB pricing 	
Corrective Action (filled by organization audited):	
<p>Evaluate social and environmental management and monitoring actions (SIA and HCV) to ensure their effectiveness and Schedule</p>	

the implementation of the SIA and HCV evaluation activities

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification September 22, 2022

The company has sent evidence of improvements in the form of root cause analysis, corrections, and corrective actions that have been identified. However, the company must also show evidence of the results of the implementation of the Correction and Corrective Action carried out. Based on this explanation, the discrepancy in this indicator is declared Unfulfilled.

Auditor Verification September 30, 2022

The company has sent evidence of improvements in the form of root cause analysis, corrections, and corrective actions that have been identified. However, the company must also show evidence of the results of the Correction and Corrective Actions carried out and in accordance with the Auditor's response. Based on this explanation, the discrepancy in this indicator is declared Unfulfilled.

Auditor Verification dated October 13, 2022

The company has sent proofs of repairs in the form of:

- Root Cause analysis, correction, and corrective action.
- Minutes of the installation of stakes on the riparian riparian of the Senapit river/tributary which was carried out on 19 August 2022.
- Minutes of HCV socialization conducted on August 30, 2022 to employees of plasma cempaka Biru and August 31, 2022 to employees of spraying and manuring.
- Minutes of socialization of FFB pricing to suppliers conducted on 27 August 2022.
- Minutes of evaluation of social and environmental monitoring and CSR in Beringin Village (19 September 2022), Semanga Village (20 September 2022), and Sepantai Village (21 September 2022). Also attached is the attendance list and documentation in the form of photos of the evaluation activities carried out. Based on the verification, there are several things that are of concern from the results of the evaluation carried out. Note: How is the follow-up to the results of the evaluation carried out? because there are several things that become the attention of each village from the results of the evaluation.

Based on this evidence, the discrepancy in this indicator is declared as Not Yet Fulfilled, because there are still auditor questions related to the results of the evaluation of the social monitoring plan that was carried out.

Auditor Verification dated 24 October 2022

The company has sent proof of improvement in the form of the PT Agronusa Investama SIA Work Program in 2023 which is a follow-up to the results of the evaluation of SIA activities that have been carried out. The work program will be monitored again in May and November 2023 to find out that developing issues can be mitigated. Based on the evidence of improvement sent by the company, the discrepancy in this indicator is declared to have been fulfilled and will be re-observed at the next assessment.

Verified by : Rahmat Abdiansyah

NCR No.	: 2022.04	Issued by	: Sentot Adi Subandono
Date Issued	: August 13, 2022	Time Limit	: 11 November 2022
NC Grade	: Major	Date of Closing	: October 13, 2022
Standard Ref. & Requirement	3.6.1 All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.		
Evidence observed (filled by auditor):			
<ul style="list-style-type: none"> • Based on review of the HIRADC Estate documents (updated 03 January 2022) and field observations at the Estates, it is known that 			

there are activities whose hazard risk analysis has not been identified, such as:

- Pick bagworm
- Beneficial plant maintenance
- HGU boundaries peg inspection
- HCV conservation
- Nursery area
- Piezometer inspection, subsidence pole and weirs
- Subsidence pole, piezometer, and weirs maintenance
- Based on review of the Identification of SHE Aspects and Impact documents and field observations at the POM, it is known that there are activities whose hazard risk analysis has not been identified, such as activities in the water intake area, where there is a potential hazard for activities related to electricity, water pumps and activities at risk of drowning.
- SOP 27/WIP-KB/(01)/0421 concerning HIRADC which has been approved by the Kalimantan Barat Plantation Head, effective April 2021, it is known that in point 6.5 it states that all potential that may arise as a result of work activities/product activities of goods and services must be registered in hazard identification. Hazard identification is not limited in terms of potential to activities that occur in the unit, but can be motivated by events in other relevant places.

Non-Conformance Description (filled by auditor):

Based on this, it is known that not all operating activities at PT ANI have been assessed for risk to identify OHS problems according to the procedures they have.

Root Cause Analysis (filled by organization audited):

There is no special event or forum for evaluating HIRADC.

Correction (filled by organization audited):

Add any work that has not been covered (according to the findings) to the HIRADC assessment.

Corrective Action (filled by organization audited):

Include the HIRADC evaluation as a fixed agenda in the OHC Committee meeting to ensure HIRADC continues to cover the dynamics of the company's operations.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification September 23, 2022

The company has sent proof of improvement in the form of root cause analysis, Correction, and Corrective Action that have been identified. However, there are still comments and questions from the auditor regarding the root cause analysis, no evidence of corrective correction has been shown, and comments related to corrective actions that are in accordance with the improvement of the root cause analysis. Based on this explanation, the non-compliance with this indicator is declared **Not Fulfilled**.

Auditor Verification September 27, 2022

The company has provided an acceptable response regarding root cause analysis. For Correction and Corrective Action, please respond to the auditor's response above by showing the supporting evidence. Based on this explanation, the discrepancy in this indicator is declared **Not Fulfilled**.

Auditor Verification October 05, 2022

The company shows evidence of improvement as follows:

1. Minutes of the OHS Committee meeting on 19 August 2022 at the Senabah Estate, which discussed work accident investigations and HIRADC discussions related to water transportation, peat and erosion management, beneficial plant nurseries, HCV, and pests and diseases.
2. HIRADC documents in excel format which discuss among others related to field operations in estate such as spraying, fertilizer, slashing, landscaping, harvesting, pruning, loading FFB, thinning out, replanting, EFB and solid applications, pest and disease, maintenance of roads and bridges, WTP, and firefighters. Also related to offices, housing, workshops, and generators.
3. However, it has not yet been found:
 - a. HIRADC signing of the latest evaluation and compilation results

b. HIRADC related to the oil palm nursery which at the time of the audit was in the Senabah Estate.

Based on this, the discrepancy is declared **not fulfilled**.

Auditor Verification October 13, 2022

The CH shows evidence of improvement as follows:

1. HIRADC document updated September 2022 along with approval by the Manager, among others related to bagworm collection, beneficial plant maintenance, stake inspection, conservation inspection, piezometer inspection and maintenance, pole subsidence and weirs inspection
2. Revision of Nursery HIRADC as of 01 September 2022 and approval by Manager.

Based on the evidence submitted, the discrepancy is declared to **have been fulfilled** and will be observed again in the next audit.

Verified by : Sentot Adi Subandono

NCR No.	: 2022.05	Issued by	: Rahmat Abdiansyah
Date Issued	: 13 August 2022	Time Limit	: ASA 1.4
NC Grade	: Minor	Date of Closing	: -
Standard Ref. & Requirement	: 4.3.1 Contributions to community development that are based on the results of consultation with local community are demonstrated.		
Evidence observed (filled by auditor):			
<ul style="list-style-type: none"> • The company shows CSR Programs for the 2022 Period including: <ol style="list-style-type: none"> 1. Road Repair Assistance for Village Infrastructure and Facilities 2. Village Office Repair Assistance 3. Assistance for school renovation and school facilities 4. Assistance in school/university educational activities 5. Support facilities for community empowerment 6. Provision of basic food vaccines for the Covid 19 Sambas Regency 7. Assistance with activities related to culture 8. Assistance for religious events and facilities • Then, from the results of an interview with one of the Semanga Village hamlets, it was conveyed that they questioned what PT ANI's CSR program is for their village. • The company has not been able to show evidence that CSR or contribution to community development is based on the results of consultations with local communities. 			
Non-Conformance Description (filled by auditor):			
The Company has not been able to show evidence that CSR or contribution to community development is based on the results of consultations with local communities			
Root Cause Analysis (filled by organization audited):			
There is still a lack of public understanding of the differences between CSR programs and community development programs owned by companies, and how they are implemented. This is because consultations with local communities have not been effective in providing a correct understanding of CSR and its implementation mechanisms.			
Correction (filled by organization audited):			

Review community development programs by the end of 2022 and consult with the relevant communities prior to implementation

Corrective Action (filled by organization audited):

Improving consultation and participatory processes that are more effective by compiling work programs as a result of consultations with the community.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification September 22, 2022

The company has sent evidence of improvements in the form of root cause analysis, corrections, and corrective actions that have been identified. However, the company must also show evidence of the results of the implementation of the Correction and Corrective Action carried out. In addition, there are auditor comments related to the root problems identified by the company. Based on this explanation, the discrepancy in this indicator is declared Unfulfilled.

Auditor Verification September 30, 2022

The company has sent evidence of improvements in the form of root cause analysis, corrections, and corrective actions that have been identified. However, the company must also show evidence of the results of the implementation of the Correction and Corrective Action carried out. Based on this explanation, the discrepancy in this indicator is declared Unfulfilled.

Auditor Verification on October 13, 2022

The company has sent proofs of repairs in the form of:

- Root Cause analysis, correction, and corrective action.
- Minutes of consultation on CSR program patterns and review of community empowerment programs in Beringin Village (19 September 2022), Semanga Village (20 September 2022), and Sepantai Village (21 September 2022). Also attached is the attendance list and documentation in the form of photos of activities carried out in a participatory manner. Based on the verification, there are several things that are of concern from the results of the evaluation carried out. Note: How is the follow-up to the results of the evaluation carried out? because there are several things that become the attention of each village from the results of the evaluation. Has a CSR program been prepared based on the evaluation results?

Based on this evidence, the discrepancy in this indicator is declared as **Not Yet Fulfilled**, because there are still auditor questions related to the results of consulting on CSR program patterns and review of community empowerment programs.

Verified by : **Rahmat Abdiansyah**

NCR No.	: 2022.06	Issued by	: Sentot Adi Subandono
Date Issued	: August 13, 2022	Time Limit	: ASA 1.4
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	6.7.2 Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.		
Evidence observed (filled by auditor):			
Based on document review, field observations and interviews with management representatives, the following facts were found:			
<ul style="list-style-type: none"> • Based on field observations in Mill laboratories and workshops, it was found that the contents of the first aid kit were in accordance with Permenakertrans 15 of 2008 (21 items contained). 			

- Based on field observations at Kumpai Estates, it was found that 3 first aid bags examined were in accordance with Permenakertrans 15 of 2008 (contains 21 items).
- Based on field observations at Senabah Estate found that 1 out of 2 first aid bags examined totalled 12 items.
- Based on field observations at the Kumpai Estates fertilizer warehouse, it was found that the contents of the first aid kit were not in accordance with Permenakertrans 15 of 2008 (no Aquades, scissors, tweezers, eye glasses, flashlights and safety pins) and the Aquades were replaced with mineral water.
- Based on field observations at the Sentama Lestari Cooperative, it was found that there were 21 items of first aid kits with distilled water replaced with mineral water.
- Circular Letter from EHS, dated 3 January 2022, regarding the availability of Aquades, which experienced a delay in arrival, so it was replaced with Mineral Water.
- Purchase Order document dated 05 August 2022 related to procurement of first aid contents, such as distilled water, small flashlights, gauze, rivanol, bandages and others.
- First Aid Procedure for Accidents, document number SOP 34/WIP-KB/(0)/2011, Revision 0, effective date January 2011, which states that the contents of a first aid kit bag are 21 items in accordance with Permenaker No. 15 of 2008 concerning first aid at work.

Non-Conformance Description (filled by auditor):

Based on the explanation above, it is known that the contents of the first aid boxes and bags available in the field are not in accordance with the procedures set by the company.

Root Cause Analysis (filled by organization audited):

There is no continuous pattern of providing the contents of the first aid kit by considering the amount of usage, time of ordering goods, expiration time etc.

Correction (filled by organization audited):

- Identify first aid kit deficiencies in all registered first aid kits
- Completing all the shortcomings of the first aid kit

Corrective Action (filled by organization audited):

Make a simple guide regarding: inspection of the completeness of the contents of the first aid kit, determining the minimum stock of each contents of the first aid kit, the time to order the contents of the first aid kit taking into account the administrative process of ordering, and the waiting period for the arrival of goods

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification September 23, 2022

The company has sent proof of improvement in the form of root cause analysis, Correction, and Corrective Action that have been identified. However, there has been no evidence of corrective corrections, and comments related to corrective actions that adjust to the improvement of the root cause analysis (if there are additions), as well as follow-up questions. Based on this explanation, the non-compliance with this indicator is declared Not Fulfilled.

Auditor Verification September 27, 2022

The company has sent responses related to acceptable corrective actions. For correction and corrective action, please show evidence of improvement. Based on this explanation, the non-compliance with this indicator is declared Not Fulfilled.

Verified by : Sentot Adi Subandono

NCR No.	: 2022.07	Issued by	: Sentot Adi Subandono
Date Issued	: August 13, 2022	Time Limit	: 11 November 2022
NC Grade	: Major	Date of Closing	: 10 November 2022
Standard Ref. & Requirement	<p>6.7.3 Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>		
<p>Evidence observed (filled by auditor):</p> <p>Use of PPE Based on field observations, document reviews and interviews with workers, it is known:</p> <ul style="list-style-type: none"> Based on field observations at the ANI POM such as Press, Clarification, Kernel, and Boiler stations, it was found that operators were wearing health masks. Based on SOP02/EHS-ANI/(01)0411 regarding PKS PPE which was approved by the Mill Head which took effect on December 2, 2015 it is known that the masks used at the Press, Clarification and Kernel stations are dust masks (masks). While at the Boiler station, use a chemical and dust mask with a respirator. Based on interviews with 2 manual maintenance workers in block 907 of the Sentama Lestari Cooperative, it was found that 1 worker was wearing a torn boot. Information from the employee that the damage had been reported for about a month, but had not yet received a replacement. From the results of field visits during spraying activities with the Supremo trademark herbicide at Kumpai it was found that the spray workers used Carbon Active filter masks. While MSDS Supremo states that one of the safety instructions for workers is to use a fine dust mask (class P1) or an air respirator. Then found the use of face shield PPE by workers when carrying out spraying activities at Kumpai while not covering their faces. The use of PPE face shields that do not cover the face and the use of masks that do not cover the nose were also found during observations of NPK fertilization activities at the Sentama Lestari Cooperative, Cempaka Biru Cooperative & Kumpai. <p>PPE Washing and Storage</p> <ul style="list-style-type: none"> Based on the results of interviews with workers at the Cempaka Biru Cooperative and Sentama Lestari Cooperative, it is known that PPE in the form of masks, face shields, rubber gloves and aprons are washed in the river and taken home after work. Based on the results of interviews with herbicide applicators at Senabah, it is known that PPE in the form of an apron is taken home after work. Senabah shows the minutes of the socialization of PPE storage in the PPE Warehouse and moving Aprons from workers' homes to the PPE Warehouse which was carried out on 10 August 2022. PPE Matrix of Estate states that PPE in the form of masks, face shields, rubber gloves and aprons must be stored in the sterilizer bathroom (rinse house). <p>Non-Conformance Description (filled by auditor):</p> <p>Based on the explanation above, it is known that the use, washing and storage of PPE is not in accordance with the MSDS and procedures established by the company.</p> <p>Root Cause Analysis (filled by organization audited):</p> <ul style="list-style-type: none"> There are no tools that can support effective supervision to ensure the appropriateness, use, washing and storage of PPE There is no continuous pattern of PPE ordering by considering the amount of use, the time of ordering goods, the suitability of PPE with MSDS requirements, etc. <p>Correction (filled by organization audited):</p>			

- Change personal protective equipment for PPE that has been identified as damaged, in accordance with the MSDS requirements and identify the type of PPE for each type of work.
- Make a report on the change / provision of PPE to workers.
- Storing PPE in the storage warehouse and ensuring its completeness in the warehouse.

Corrective Action (filled by organization audited):

- Using the morning master (briefing) as a means to check the completeness and adequacy of PPE for all workers.
- Create daily inspection forms for the use, washing and storage of PPE.
- Using the results of daily inspections as material for corrective action for discrepancies in the use, washing and storage of PPE.
- Socialization to employees is carried out routinely and periodically on how to use, replace PPE and maintain PPE.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification September 23, 2022

The company has sent evidence of improvements in the form of root cause analysis, corrections, and corrective actions that have been identified. However, there are still comments and questions from the auditor regarding the root cause analysis, no evidence of corrective correction has been shown, and comments related to corrective actions that are in accordance with the improvement of the root cause analysis. Based on this explanation, the discrepancy in this indicator is declared Unfulfilled.

Auditor Verification September 27, 2022

The company has sent an acceptable repair of the root cause analysis, but there is still an auditor's response to the correction plan, and evidence of correction and corrective action needs to be shown. Based on this explanation, the discrepancy in this indicator is declared Unfulfilled.

Auditor Verification dated 26 October 2022

The company shows evidence of improvement, as follows:

1. PPE inspection form for the Senabah Estate Engineering Division for the period 12-17 September 2022, as well as an official report accompanied by photo documentation of the submission of PPE welding gloves and safety helmets as a follow-up to the inspection results.
2. PPE inspection form Division 3A Estate Senabah for fertilizing and spray workers for the period September 2022. Inspections carried out include completeness of PPE, condition of PPE, use of PPE when working, and storage of PPE.
3. PPE inspection form for Phase 02 Estate Senabah Division for fertilizing and spraying workers for the period September 2022. Inspections carried out include completeness of PPE, condition of PPE, use of PPE when working, and storage of PPE.
4. PPE inspection form for Division 2 Phase 3B Estate Senabah for fertilizing, manual, and spray workers for the period September 2022. Inspections carried out include completeness of PPE, condition of PPE, use of PPE when working, and storage of PPE.
5. PPE inspection form for Phase 01 Estate Senabah Division for fertilizing and spraying workers for the period September 2022. Inspections carried out include completeness of PPE, condition of PPE, use of PPE when working, and PPE storage.
6. PPE inspection form for Division 2 Phase 04 Estate Senabah for workers for the period September 2022. Inspections carried out include completeness of PPE, condition of PPE, use of PPE when working, and storage of PPE.
7. PPE inspection form for Division 1 Phase 03A Estate Senabah for harvesters for the September 2022 period. Inspections are carried out such as completeness of PPE, condition of PPE, use of PPE when working, and storage of PPE.
8. PPE inspection form for Division 2 Phase 04 Estate Senabah for harvesters for the September 2022 period. Inspections carried out include completeness of PPE, condition of PPE, use of PPE when working, and PPE storage.
9. PPE inspection form for Division 2 Phase 04 Senabah for the period of July 2022 for 10 fertilization workers, as well as an official report accompanied by photo documentation of the submission of PPE rubber gloves on July 12, 2022, as a follow-up to the results of the inspection.
10. PPE inspection form Phase 01 Senabah for the period 19 - 24 September 2022 for 5 spray workers, as well as an official report accompanied by photo documentation of the submission of PPE for rubber gloves and aprons on September 20, 2022, as a follow-up to the inspection results. Note: the results of the September 19 inspection of the use of PPE are incomplete (refer to the replacement of PPE, namely 5 Aprons and 1 glove). Not informed of the action plan during PPE inspection of workers who wear PPE in a damaged condition.

11. PPE inspection form Phase 01 Senabah for the period 02 - 09 September 2022 for 1 spray worker, as well as an official report accompanied by photo documentation of the submission of PPE rubber gloves on September 09 2022, as a follow-up to the inspection results. Note: the results of the inspection on September 7, workers do not use rubber gloves when working because they are damaged. Not informed of the action plan during PPE inspection for workers who do not wear PPE.
12. The Senabah Phase 01 PPE inspection form for the period 12-14 September 2022 for 6 spray workers, as well as an official report accompanied by photo documentation of the PPE submission according to the identification of damage (rubber gloves, masks, and face shields) on 16 September 2022, as a follow-up inspection results. Note: the results of the September 14 inspection of workers using incomplete PPE when working. Not informed of the action plan during PPE inspection for workers who do not wear PPE. On September 15, workers are still working under the same conditions as on September 14, 2022.

Based on the evidence submitted, there are still Auditor's comments such as numbers 10, 11, and 12. The company has also not shown any evidence of improvement regarding the Auditor's comments on September 27 (yellow highlight) regarding PPE that was used but was not perfect. Then, the evidence of repairs that were submitted only showed repairs at the Senabah Estate only. Based on this, the discrepancy is declared not fulfilled.

Verification October 30, 2022

The company shows additional evidence of improvement, as follows:

1. News of MSDS and OHS socialization on September 1, 2022 at Phase 1 Spraying, Senabah Estate, including the types of PPE spraying, correct use of PPE when spraying, prohibition of buying personal PPE, prohibition of washing apron, clothes, and PPE in trenches / river but washed in the place provided.
2. Minutes of MSDS and OHS socialization on September 1, 2022 in Phase 2 Manuring, Senabah Estate including the types of PPE spraying, correct use of PPE, prohibition of buying personal PPE, prohibition of washing apron, clothes, and PPE in ditches/river but washed in the place that has been provided.
3. Minutes of MSDS and OHS socialization on September 2, 2022 at Phase 3A Maintenance, Senabah Estate, including the types of PPE spraying, correct use of PPE, prohibition of buying personal PPE, prohibition of washing apron, clothes, and PPE in ditches/river but washed in the place that has been provided.
4. News of MSDS and K3 socialization on 02 September 2022 at Phase 3B Spraying, Senabah Estate including the types of PPE spraying, correct use of PPE when spraying, prohibition of buying personal PPE, prohibition of washing apron, clothes, and PPE in trenches / river but washed in the place provided.
5. Minutes of socialization of the use of PPE, PHS, and MSDS on August 31, 2022 to Spraying and Manuring workers at Plasma Sentama Lestari, including the correct and consistent use of PPE, replacement of damaged PPE, distribution of PPE for free, and MSDS materials. The mechanism for cleaning the work tools and PPE used has not been shown, as well as their storage.
6. 13. Minutes of socialization on the use of PPE, OHS, and MSDS on 31 August 2022 to all workers in Phase 5, including the correct and consistent use of PPE, replacement of damaged PPE, distribution of free PPE, and material MSDS. The mechanism for cleaning the work tools and PPE used has not been shown, as well as their storage.
7. 14. Minutes of socialization of the use of PPE, OHS, and MSDS on August 30, 2022 to Spraying and Manuring workers at Plasma Cempaka Biru, including the correct and consistent use of PPE, replacement of damaged PPE, distribution of PPE for free, and MSDS materials. The mechanism for cleaning the work tools and PPE used has not been shown, as well as their storage.

Based on the evidence shown, it is known that the Auditor's response dated September 27 has shown evidence of correction. This has also become an example of proof of corrective action according to the Auditor's comments on September 27, 2022. However, there are still Auditor comments on verification on October 26 and October 30 (yellow highlights), so that the non-conformity is declared unfulfilled.

Auditor Verification, 10 November 2022

The company shows additional evidence of improvement, as follows:

1. Minutes of handover of PPE Apron dated October 27, 2022 for phase 5 Manuring workers with initials A.
2. Minutes of handover of PPE boots on October 29, 2022 for 10 harvesters of Phase 6B.
3. Minutes of training and socialization of the mechanism for the use, replacement, and maintenance and monitoring of PPE on 27 October 2022 in Phase 1, phase 2, phase 3, and phase 4. The materials presented included the mechanism for cleaning work tools and PPE, as well as their storage.
4. PT ANI Kumpai's PPE Daily Inspection Form Division 1A, period 24 – 29 October, with identification of damaged boots and aprons and an action plan with replacement of the damaged PPE on the same date.

5. PT ANI Kumpai's PPE Daily Inspection Form 6B Division, period 24 – 29 October, with identification of damaged boots and an action plan with replacement of the damaged PPE on the same date.
6. Minutes of handover of PPE on 24 October 2022 for Phase 5A manuring workers.

Based on the additional evidence shown, it was concluded that the discrepancies had been met and would be observed again in the next surveillance audit.

Verified by : Sentot Adi Subandono

NCR No.	: 2022.08	Issued by	: Rahmat Abdiansyah
Date Issued	: 13 August 2022	Time Limit	: ASA 1.4
NC Grade	: Minor	Date of Closing	: -
Standard Ref. & Requirement	: 7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.		

Evidence observed (filled by auditor):

- The company already has a waste management plan that is listed in several documents, including:
 1. Fertilizer Application Procedure Number PSKK 03/WIP-KB/(0)/2011 in January 2011 which explains that all empty sacks and excess fertilizer must be returned to the warehouse for re-counting. If all the sacks have been collected, the foreman must take them to the sack washing area. Inner sacks that have been collected are stored in the Hazardous and Toxic Waste Warehouse.
 2. Land Application Procedure Number SOP 27/EHS-ANI/(00)/0919 dated 27 September 2019 which explains that one of the maintenance of the application land is to carry out maintenance/cleaning of flat beds or furrows from palm fronds so that the volume of liquid waste remains in accordance with the dosage and specified rotation.
 3. Residential Solid Waste Management Procedure with SOP Number 13/WIP-KB/(1)/0119 in January 2019 which explains that each employee living in housing provided by the company is required to collect their waste regularly at the provided landfills and cleaning the yard around the house. In addition, it is prohibited to burn waste in any form without the company's permission.
 4. Document identification of factory waste which explains that the management of empty fruit bunches is used for mulch in the Estate.
 5. Procedure for the Management of Hazardous Materials and Hazardous Waste with SOP Number 19/WIP-KB/ (0)/0610 in January 2016 which explains that all hazardous and toxic wastes are stored in a temporary hazardous material waste storage area which is then transferred/transported/used or managed by another party who already has a permit.
 6. Housing Treatment Procedure with SOP Number 73/WIP-KB/(00)/0915 on 1 September 2015 which explains that household domestic waste is channeled into drainage in a well-managed condition.
- The results of observations in the Mill and Estate area of PT ANI obtained the following evidence:
 1. The results of field observations in the Block 65/66 A Land Application area show that there are palm fronds entering the flat bed land application.
 2. The results of field observations in the housing of PKS employees, it is known that there is household solid waste behind the housing drainage channel and it is not placed in the provided trash can.
 3. The results of field observations in the housing of PT ANI's Kumpai unit phase 6 plantation employees found that there was household solid waste behind the housing which was not placed in the trash. In addition, there is a former burning of domestic waste (organic mixed with inorganic) behind the employee housing.
 4. The results of field observations at PT ANI's Kumpai unit phase 6 plantation employee housing revealed that there were former Pertamina oil drums and used motor oil containers behind the housing.
 5. The results of field observations in the Mill area show that there are piles of EFB that are full and have entered the leachate drainage canal. In addition, there are puddles of leachate and the leachate is channeled into drainage channels which are

dumped into environmental ditches outside the mill.

6. The results of observations in the housing area of PT ANI's Kumpai unit phase 6 plantation revealed that there was a pool of household liquid waste and the drainage channel for household liquid waste did not flow and was in a damaged condition.
7. Based on the results of field observations in the fertilizer activity of block 925 of the Cempaka Biru Cooperative, harvesting activities of block 916 of the Cempaka Biru Cooperative, and block 080 of Kumpai Estates, it is known that there are sacks of fertilizer and inner fertilizer placed in the midrib pile and not in the B3 waste warehouse and sack warehouse. fertilizer.

Non-Conformance Description (filled by auditor):

The Company has not been able to demonstrate that the implementation of the waste management plan has been carried out in accordance with its SOP

Root Cause Analysis (filled by organization audited):

Existing waste management SOPs/procedures are not accompanied by the provision of regular periodic monitoring/monitoring mechanisms (covering: monitoring tools, monitoring PIC, monitoring results follow-up).

Correction (filled by organization audited):

- Clean the entire rorak Land Application from midrib and trash
- Total cleaning in the Estate housing and POM (garbage, burning residue and others)
- Control of used LB3 packaging from all housing
- Improved leachate handling at PKS
- Repair of household liquid waste drainage channels in phase 6 housing
- Collecting sacks and inner fertilizers throughout the Estate area and taking them to the sack warehouse/LB3
- Conducting socialization to employees about LB3 types, LB3 hazards and LB3 management
- Conducting socialization of organic and inorganic waste management

Corrective Action (filled by organization audited):

- Preparation of waste management inspection forms for activities in POM, Estate areas and housing
- Determination of PIC and schedule for periodic routine inspections
- Using inspection results as improvement material

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification September 22, 2022

The company has sent proof of improvement in the form of root cause analysis, Correction, and Corrective Action that have been identified. However, the company must also show evidence of the results of the Correction and Corrective Actions that have been carried out. In addition, there are still auditor's comments related to the root of the problem identified by the company. Based on this explanation, the non-compliance with this indicator is declared Not Fulfilled.

Auditor Verification September 29, 2022

The company has sent proof of improvement in the form of root cause analysis, Correction, and Corrective Action that have been identified. However, the company must also show evidence of the results of the Correction and Corrective Actions that have been carried out. Based on this explanation, the non-compliance with this indicator is declared Not Fulfilled.

Verified by : **Rahmat Abdiansyah**

NCR No.	:	2022.09	Issued by	:	Rahmat Abdiansyah
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Date Issued	: 13 August 2022	Time Limit	: 11 November 2022
NC Grade	: Major	Date of Closing	: 17 October 2022
Standard Ref. & Requirement	7.12.4 Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plans to protect and/ or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).		
Evidence observed (filled by auditor): <ul style="list-style-type: none"> The company has an HCV Management Plan for the 2021-2025 period which was updated on 3 February 2021 based on the results of a review of the HCV Management Plan for the 2016-2020 period. For example, the management plan for HCV 4 is carried out by making riparian boundary markings along both sides of the river, no chemical treatment either spraying or fertilizing. Reports on the results of HCV monitoring carried out by the company obtained the following information: <ol style="list-style-type: none"> On November 10 2021 at the Senabah Estate it was discovered that there was spraying on the River Border in Blocks 26B, 220E, 20 A, 28 B, 29A, 14 C and 14 D. On March 30 2022 at the Kumpai Estate it was discovered that there was trash in the HCV/River in Block 026. On April 29 2022 it was discovered at the Kumpai Estate that there were no HCV Signs on the River Border in Block 918. On 24 May 2022 at the Kumpai Estate it was discovered that there was spraying on the River Border in Block 918. On 27 June 2022 at the Kumpai Estate it was discovered that there was spraying on the River Border in Block 188. Then the results of field observations at the Cempaka Biru Cooperative Block 918 found that there were traces of pesticide application on the riverbank which is an HCV area. In addition, in the riparian section there is only a riparian boundary on one side. 			
Non-Conformance Description (filled by auditor): The Company has not been able to prove that the HCVs that have been identified, protected, and/or enhanced and the implementation of the HCV management plan are in accordance with the 2021-2025 HCV management plan			
Root Cause Analysis (filled by organization audited): The use of monitoring results is still not optimal as a basis for evaluating management actions because the implementation of HCV maintenance does not use the complete management cycle as a guide (Plan – DO – Check – Action).			
Correction (filled by organization audited): <ul style="list-style-type: none"> Addition of HCV signs and riparian boundary markers Survey the entire riparian area to determine if there are still areas that need restoration related to traces of spraying or the presence of trash 			
Corrective Action (filled by organization audited): The application of the PDCA cycle in the evaluation of management actions by using the results of monitoring as a measuring tool for whether or not improvements are needed to the HCV management plan.			
Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification September 22, 2022 The company has sent proof of improvement in the form of root cause analysis, Correction, and Corrective Action that have been identified. However, the company must also show evidence of the results of the Correction and Corrective Actions that have been			

carried out. In addition, there are still auditor's comments related to the root of the problem identified by the company. Based on this explanation, the non-compliance with this indicator is declared Not Fulfilled.

Auditor Verification September 30, 2022

The company has sent proof of improvement in the form of root cause analysis, Correction, and Corrective Action that have been identified. However, the company must also show evidence of the results of the Correction and Corrective Actions that have been carried out. Based on this explanation, the non-compliance with this indicator is declared Not Fulfilled.

Auditor Verification on October 17, 2022

The company has sent proofs of repairs in the form of:

- Root cause analysis, Correction, and corrective action.
- Minutes of stake installation which took place on 19 August 2022 and 20 September 2022 in the HCV area along the river. The company has also attached documentation in the form of photos of the installation of stakes in the HCV area.
- Minutes of HCV outreach to plasma employees which was conducted on August 30, 2022. The company also attached socialization materials which included protection of HCV areas and a ban on spraying in river border areas.
- Monitoring Form for HCV areas conducted on 2 September 2022, 6 September 2022, and 30 August 2022. The monitoring results show that there are no traces of spraying, illegal logging, wildlife traps, mining in the river border area.
- Evaluation of the 2022 work plan conducted on September 7, 2022. The results of the evaluation revealed that the company has established a work plan such as monitoring/monitoring the spraying of riparian blocks which is carried out every month, measuring the ability/understanding of employees related to HCV, and painting/marketing boundaries spray in riparian areas.

Based on the proof of improvement sent by the company, the discrepancies in this indicator are declared Fulfilled and will be observed again in the next assessment.

Verified by : **Rahmat Abdiansyah**

NCR No.	: 2022.10	Issued by	: Rahmat Abdiansyah
Date Issued	: 13 August 2022	Time Limit	: ASA 1.4
NC Grade	: Minor	Date of Closing	: -
Standard Ref. & Requirement	: 7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.		
Evidence observed (filled by auditor):			
<ul style="list-style-type: none"> • Reports on the results of HCV monitoring carried out by the company obtained the following information: <ol style="list-style-type: none"> 1. On November 10 2021 at the Senabah Estate it was discovered that there was spraying on the River Border in Blocks 26B, 220E, 20 A, 28 B, 29A, 14 C and 14 D. 2. On March 30 2022 at the Kumpai Estate it was discovered that there was trash in the HCV/River in Block 026. 3. On April 29 2022 it was discovered at the Kumpai Estate that there were no HCV Signs on the River Border in Block 918. 4. On 24 May 2022 at the Kumpai Estate it was discovered that there was spraying on the River Border in Block 918. 5. On 27 June 2022 at the Kumpai Estate it was discovered that there was spraying on the River Border in Block 188. • The company has an HCV Management Plan for the 2021-2025 period which was updated on 3 February 2021 based on the results of a review of the HCV Management Plan for the 2016-2020 period. For example, the management plan for HCV 4 is carried out by making riparian boundary markings along both sides of the river, no chemical treatment either spraying or fertilizing. • The 2021-2025 HCV Management Plan Realization & Program Report which explains the evaluation of the results of the management plan realization activities. The results of the evaluation are as follows: <ol style="list-style-type: none"> 1. Continuous installation and maintenance of HCV signs 2. Addition of riparian boundary stakes to replace missing or damaged stakes. 3. Planting riparian trees so that they can become animal corridors. 			

4. Enrichment of the types of plants that are seeded.

5. Number of nursery stock added.

However, there has been no evaluation of the results of the HCV monitoring carried out regarding the spraying on the riverbanks.

- Then, based on the verification of the 2021-2025 HCV Realization Report & Program Management Plan documents, no follow-up was carried out on the results of the evaluation.

Non-Conformance Description (filled by auditor):

The Company has not been able to prove that the results of HCV monitoring have been used to follow up on improving the management plan

Root Cause Analysis (filled by organization audited):

There has been no application of the PDCA cycle in evaluating management actions using monitoring results

Correction (filled by organization audited):

- Addition of HCV signs and riparian boundary markers
- Survey the entire riparian area to determine if there are still areas that need restoration related to traces of spraying or the presence of trash

Corrective Action (filled by organization audited):

- Application of the PDCA cycle in evaluating management actions using monitoring results
- Develop a schedule for periodic reviews of the results of HCV monitoring

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification Date 22 September 2022

The company has sent evidence of improvements in the form of root cause analysis, corrections, and corrective actions that have been identified. However, the company must also show evidence of the results of the implementation of the Correction and Corrective Action carried out. Based on this explanation, the discrepancy in this indicator is declared Unfulfilled.

Auditor Verification September 30, 2022

The company has sent proof of improvement in the form of root cause analysis, Correction, and Corrective Action that have been identified. However, the company must also show evidence of the results of the Correction and Corrective Actions carried out in accordance with the auditor's response. Based on this explanation, the non-compliance with this indicator is declared Not Fulfilled

Verified by : **Rahmat Abdiansyah**

3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	2.1.1	<ul style="list-style-type: none"> • Certificate number 060/Ket-GS/SER/PTP/VIII/2022 dated August 08, 2022 from PT Global Safety has been shown which explains 1 Engine Room operator will carry out power house training in September 2022. • It has been shown that the results of the assessment of 1 generator set operator with the recommendation that the results of the PJK3 (Occupational Safety and Health Service Company) assessment meet competence. However, the certificate of competence is in the process of being issued. <p>The company has the opportunity to ensure the issuance of the OHS license for engine room operator and the standard license for electrical power engineering.</p>
2	4.4.1	<p>The company has shown positive progress regarding the HGU acquisition process since the previous audit, namely:</p> <ul style="list-style-type: none"> • On 22-23 July 2021 the Regional Office of the BPN of Kalimantan Barat Province carried out pre-committee B activities or field inspections of the area requested for HGU by PT Agronusa Investama by involving the Village Head, Village Consultative Council, and local community leaders whose administrative area is within PT ANI's operations. • On December 1, 2021 the Regional Office of BPN for the Province of Kalimantan Barat carried out the activities of Committee B on the application for PT ANI's Cultivation Rights with its partnership cooperative. Then the results of a study from the Forest Area Consolidation Center for Region III stated that there was a PIPPIB slipper in the HGU application area, both the PT ANI core and the plasma area of the Serba Usaha Sentama Lestari Cooperative, Serba Usaha Cempaka Biru Cooperative as well as Pusaka Abadi Nan Jaya Cooperative. The area of the PIPPIB slipper area is ± 20 Ha and for the area that is on the PIPPIB map to consult with the Directorate of Inventory and Monitoring of Forest Resources • Following up on the results of the study, PT ANI has sent a letter to the Director of Inventory and Monitoring of Forest Resources, Directorate General of Planning and Environmental Management, Ministry of Environment and Forestry via letter No. 02/ANI/Leg-AdmJkt/I/2022 dated 12 January 2022 requesting a PIPPIB revision. • Then a Letter from the Directorate of Inventory and Monitoring of Forest Resources, Directorate General of Forestry Planning and Environmental Management, Ministry of Environment and Forestry of the Republic of Indonesia dated July 13, 2022 regarding the response to the PIPPIB revision request on behalf of PT ANI in Sambas Regency, Kalimantan Barat Province stated that some of the areas included in the PIPPIB is the remaining polygons resulting from digital spatial data processing in the previous PIPPIB revision process and PT ANI's application area which is still included in PIPPIB is used as material for revision of maps indicative of discontinuing the granting of business permits or changes to the allotment of new forest areas in primary natural forest and subsequent peatlands. • After receiving the response letter from the Ministry of Environment and Forestry, PT ANI is in the stage of carrying out the latest review from the Forest Area Consolidation Center Region III and the Kalimantan Barat Province Environment and Forestry Service on the area of PT ANI's HGU application, Sentama Lestari Cooperative, Pusaka Abadi Nan Jaya Cooperative and Anugerah Semaro Cooperative. • On July 22, 2022, a Letter was obtained from the Head of the Regional Forest Area Consolidation Center II which stated that based on the Letter of the Directorate of Inventory and Monitoring of Forest Resources, Directorate General of Forestry Planning and Environmental Management, Ministry of Environment and Forestry of the Republic of Indonesia dated July 13, 2022, it was stated that the area included in PIPPIB is the residual polygon resulting from digital processing of spatial data in the previous PIPPIB revision process as well as the results of the revision of the land plot map in the PT ANI area, still included in the PIPPIB map but becoming the next PIPPIB revision. • While the ASA-1.3 audit is taking place, PT ANI will send a letter to the Kalimantan Barat Provincial BPN and attach the results of an explanation from the Directorate of Inventory and Monitoring of Forest

No	Ref. Std.	Description
		<p>Resources, Directorate General of Forestry Planning and Environmental Management, Ministry of Environment and Forestry of the Republic of Indonesia and the Center for Forest Area Consolidation Region III and the Kalimantan Barat Provincial Forestry Service while waiting for the results of the revision from PIPPIB period 2 of 2022 so that the process of issuing PT ANI's HGU Decree and HGU Certificate can be processed.</p> <p>The unit of certification is encouraged to continue to ensure positive progress in the process of obtaining PT ANI HGU.</p>
3	7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>The company has Fertilizer Application Procedure Number PSKK 03/WIP-KB/(0)/2011 in January 2011 which explains that all empty sacks and excess fertilizer must be returned to the warehouse for re-counting. If all the sacks have been collected, the foreman must take them to the sack washing area. Inner sacks that have been collected are stored in the Hazardous waste Warehouse. The results of interviews with fertilizer employees at the Senabah Estate revealed that workers had an understanding of the inner waste management of fertilizer by collecting and storing it in the LB3 Warehouse. However, the results of interviews with fertilizer employees at the Kumpai Estate revealed that employees did not understand the procedure for managing fertilizer inner waste.</p> <p>The company has the opportunity to ensure that all fertilizer employees understand the understanding of fertilizer inner waste management.</p>

3.4.4. Noteworthy Positive Components

No	Description
1	Commitment to implement the principles of sustainable oil palm plantation management.
2	The company has competent human resources in their respective fields.
3	The company no longer uses pesticides with the active ingredient paraquat
4	Presentation of documents is quite good
5	Has a drinking water depot facility which is provided free of charge to workers

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Department of Public Housing, Residential Areas and the Environment of Sambas Regency</p> <ul style="list-style-type: none"> • The company already has a permit in the environmental sector in accordance with the provisions • The issue of CPO tank failure in the <i>Sambas Besar</i> River is not owned by PT Ani Sambas but belongs to PT Darmex. • The Great Sambas River is a transportation route that is passed by several companies including PT Ani Sambas. • Mandatory reports in the environmental field have been reported regularly by the company. • There has been a pollution issue in recent years and the issue has been resolved. • The progress of the domestic waste permit is no longer in Sambas Regency and has been processed at the Ministry of Environment because PT Ani Sambas is a foreign investment. 	<p>In general, there are no negative issues from the Environmental Service. The issue of pollution has been explained in indicator 7.8.1.</p>
<p>Beringin Village (Village Head)</p> <ul style="list-style-type: none"> • Communication between the company and the Village is going quite well. • There is no environmental pollution by the company. • The positive impact of having a company is that there are village people who work for the company. • Apart from that, the Company also built plasma plantations • CSR has been realized by the company 	<p>There are no negative issues from Beringin Village.</p>
<p>Semanga Jaya Village (Village Head and Village Secretary)</p> <ul style="list-style-type: none"> • There is an issue regarding waste leakage from ANI POM • There is an issue that the results of washing from POM are discharged into water bodies • The program of CSR does not involve the community or by asking the community's opinion regarding the necessary needs. • There was a problem with the Pusaka Abadi Nan Jaya plasma, but it has been resolved by deliberation by the new PT ANI legal team. • At present communication with PT ANI's legal team is very good, in contrast to the previous legal team which was difficult to communicate with. Currently PT ANI's legal team is quite good. 	<ul style="list-style-type: none"> • The issue of waste leakage has been explained in the summary report. • Regarding community involvement in the preparation of CSR, it has been made non-conformity in indicator 4.3.1 • The problem regarding the number of farmers in the PANJ plasma has been resolved by deliberation.
<p>Sentama Lestari Cooperative (Plasma)</p> <ul style="list-style-type: none"> • Cooperation between companies and cooperatives began in 2010. 	<p>There are no negative issues from the Sentama Lestari Cooperative</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> • Management of plasma plantations is carried out by the company. • The agreed FFB price is the FFB price set by the Kalimantan Barat Provincial Plantation Office. • There are no complaints regarding FFB prices and payments. • The company has also provided training related to fertilizing, spraying and RSPO. 	
<p>3 people of Previous Land Owner</p> <ul style="list-style-type: none"> • There is no coercion from the company at the time of land compensation. • Land owners and companies agree on land compensation. • The company is considered quite cooperative in handling if there is a problem in terms of land compensation. 	<p>There were no negative issues from the previous Land Owner.</p>
<p>CV Berkat Mandiri Sentosa (FFB Supplier)</p> <ul style="list-style-type: none"> • There is a cooperation agreement between the FFB Supplier and the company. • The agreed FFB price is the FFB price determined by the Company. • FFB payments made are appropriate. • The company has taken the coordinates from the Farmers who supply FFB to CV Berkat Mandiri Sentosa. 	<p>There are no negative issues from FFB Suppliers.</p>
<p>Cempaka Biru Cooperative</p> <ul style="list-style-type: none"> • Cooperation between companies and cooperatives began in 2008. • Management of plasma plantations is carried out by the company. • The agreed FFB price is the FFB price set by the Kalimantan Barat Provincial Plantation Office. • There are no complaints regarding FFB prices and payments. • The company has also provided training related to fertilizing, spraying and RSPO. • When the company carried out the replanting, many villagers asked this because the company did not yet have a HGU and the company had not conducted socialization regarding replanting. 	<p>In general, there are no negative issues from the Plasma Cooperative. Related to replanting there has been a discrepancy in indicators 3.4.2 and 3.4.3</p>
<p>Issue from media online</p> <p>Information from some media online that there is water pollution which is probably related to activities at PT Agronusa Investama.</p>	<p>The company has clarified the matter as follows:</p> <ul style="list-style-type: none"> • Minutes of HDPE Land Application Pipe Breaking which contains a chronology of the LA pipe that broke on April 7 2021. The company has made efforts to overcome the pipeline leak by building a dam using a loader in the ditch block 912 B/C on April 8 2021. Company representative (Mill Manager Assistant and EHS) have conducted a search to



Public Issues (Institution/ NGO/Community)	Auditor Verification
	<p>other blocks and confirmed that there is no waste water flowing into the river body. The company has built blocks in blocks 910, 912 and 913 on April 8 2021. On April 8 2021, the company reported to the Sejangkung Police Chief regarding sabotage of the broken LA pipeline. On April 9, 2021, the Sejangkung Police Chief, the Sambas Police, the Sambas LH Service and the Sambas Village Head together with PKS representatives conducted TKP analysis and surface water sampling according to news that had been spread on social media. The Sambas LH Service conducted sampling at 5 points, namely T01 and T02 with a distance of 300 m and 1200 m from the pipe leak site, the estuary of the Anas River, the upper reaches of the Sambas Besar River, and the downstream of the Sambas Besar River.</p> <ul style="list-style-type: none"> • Minutes of Water Sampling dated 9 April 2021 concerning water collection at 5 points which are in the flow from the waste pond water to the meeting point of the Anak tributary with the Sambas Besar River in <i>Dusun Setambah</i>, Semanga Village, Sejangkung District. • Minutes of Mediation between Semanga Village Community Representatives, Sejangkung District, Sambas Regency and PT Agronusa Investama on June 24, 2021 which contains the submission of a request from the Semanga village community representatives to PT ANI to provide compensation and provide rainwater storage (PAH) for 1080 houses and replace loss of livelihood for 1.5 months for 63 fishermen. This has been witnessed by PT Ani, the Semanga Village Head, the Chair of the Semanga Village BPD, and the Sambas Regency Environmental Office. • Test Results Report from the Pontianak Baristan Testing Laboratory with the results of monitoring surface water quality parameters at the Anas River estuary, upstream of the Great Sambas River, and downstream of the Great Sambas River not exceeding the quality standard stipulated by PP. 22 Year 2021. • Decree No. S.Tap/53.c/VII/2021/Reskrim issued on July 15, 2021 by the Chief of the Sambas Resort Police regarding the Cessation of Investigation of Information Report No. R-LI/53/IV/2021/Reskrim dated April 8, 2021 on behalf of the reported party PT ANI Estate Kumpai. • Minutes of Field Verification of follow-up to public complaints conducted on January 5, 2022 by the Environmental Supervisor of the Kalimantan Barat Province Environmental Service (Environmental Investigator) and the Sambas Regency Environmental Service. As a follow-up to the verification results, the company has made improvements in the form of closing Pond No. 1 WWTP and Normalizing (Waste Drainage), making an embankment at the WWTP pool and raising the embankment on the outside of the WWTP pool. The entire follow-up has been completed by the company.

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Land Office of Sambas District, Dispute Section</p> <ul style="list-style-type: none"> • There is no dispute information at PT ANI. • There is information from the planology, if there is an area included in PIPPIB of ±20 ha. • Good communication between the company and the service. <p>Land Office of Sambas District, Section Head of Rights Registration and Determination</p> <ul style="list-style-type: none"> • The process of making PT ANI's HGU has now entered the stage of the Committee Session B 	<p>This has been verified in the report</p> <p>This has been verified in the report.</p>
<p>Department of Agriculture of Sambas District</p> <ul style="list-style-type: none"> • Assessment of plantation class is class III, because they do not yet have HGU. • Have plasma above 20%. • The plantation, environmental and social management is quite good. • Reporting from LPUP and monitoring of fire prevention is quite good. • There have been no fires in the last 1 year and the company has adequate firefighting infrastructure. • The company has used certified seeds. • The company pays for plasma FFB using the official plantation service price. 	<p>There is no negative issue from The Agriculture Agency.</p>
<p>CV. Multi Indah Lestari</p> <ul style="list-style-type: none"> • The contractor is currently working on Chipping, working with the company since 2021. • Obtaining a work agreement through tender. • During the tender process or working together with the company, there were no requests from company officials, and never gave any gifts to company officers. • Workers have been registered with BPJS Employment and Health and have been provided with appropriate PPE for their work. • The company has conveyed the prohibition on making fires, the prohibition on hunting, and used oil being brought back to the workshop (not to be thrown away carelessly). • There were no complaints while working with the company 	<p>This has been verified in the report.</p>
<p>CV Pulau Indah</p> <ul style="list-style-type: none"> • Engaged in construction, currently building bridges in Division 6. • The current work contract is still active, which was obtained by tender. 	<p>This has been verified in the report.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> • During the tender process or working together with the company, there were no requests from company officials, and never gave any gifts to company officers. • Workers only have personal BPJS and have not been registered with BPJS for employment. • Workers have been provided with appropriate PPE for their work. • The company has conveyed the prohibition on making fires, the prohibition on hunting, and used oil being brought back to the workshop (not to be thrown away carelessly). • There were no complaints while working with the company 	
<p>PT Harman Bangun Persada</p> <ul style="list-style-type: none"> • Work contracts in the construction sector, namely the construction of the Mess and POM docks • Has implemented an overtime system. • Workers are included in the BPJS project, but BPJS Health is not registered. If the worker is sick, the medical expenses will be covered. • Workers have been provided with appropriate PPE for their work. 	<p>This has been verified in the report.</p>
<p>CV Golden Citra Perkasa</p> <ul style="list-style-type: none"> • He is a local FFB collector from Senabah Village and Semanga Village. • EFB shipments 15 – 30 tons per day. • Newly active FFB delivery for the last 1 month. • The company has conducted land surveys and oil content tests. • It has never been submitted for the implementation of a 3rd party audit to the FFB farmer/source, but is willing if it will be examined by a 3rd party Auditor. 	<p>This has been verified in the report.</p>
<p>Manpower and Transmigration Office Sambas Regency</p> <ul style="list-style-type: none"> • There are reports regarding termination of employment due to retirement, resignation and disciplinary action • All workers have been included in the BPJS Health and Employment program • There are several names of trade unions that have been registered, namely SPSI Hukatan, SERBUK and PELIKHA. • Wages refer to the 2022 Sambas Regency Minimum Wage and there are no problems related to wages • The wage structure and scale have been implemented according to the level of years of service • The collective labor agreement is still valid • All workers have permanent employee status • Mandatory reporting has been done in an orderly manner 	<p>This has been verified in the report.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> • Medical Check Up has been done • There are no workers specifically recruited from outside the area • Response to information is good and responsive • There is no content related to child labour • Overtime payments are appropriate 	
<p>Woman of WILMAR (WoW)</p> <ul style="list-style-type: none"> • There were no cases of sexual harassment • Gender bias is evidenced by the presence of female workers who serve as security officers • Socialization related to gender is carried out in the morning briefing • Complaints can be made directly to WoW cadres • There is no obligation for a pregnancy test to start work, there is a health check for starting work • Every 3 months routine pregnancy tests are carried out for female workers • Female workers are given the right to rest during menstruation and before giving birth 1.5 months before and after giving birth 	<p>This has been verified in the report.</p>
<p>SERBUK</p> <ul style="list-style-type: none"> • There is no company intervention in selecting union officials • There are no workers' complaints regarding wages, PPE and others • There are workers who are still in the process of obtaining BPJS membership • There are several workers whose operator permits/ licences are still being processed • Work done outside normal working hours is paid overtime • If PPE is damaged it can be replaced immediately • There is an employee cooperative for the provision of basic necessities and there is also a payday market • For employees on probation, the status is permanent employee • Recruitment of employees is in accordance with procedures • Pay structures and scales have been implemented • Employee performance appraisal has been implemented • There were incidents of employees who died and after investigations were due to congenital diseases 	<p>This has been verified in the report.</p>
<p>SPSI Hukatan Pelikha</p> <ul style="list-style-type: none"> • There is no company intervention in selecting union officials • Freedom of association has been implemented • Pay structures and scales have been implemented 	<p>This has been verified in the report.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none">• The facilities provided for workers are good• Response to complaints related to housing damage was very good• The union has sent a letter regarding the discussion of the collective labor agreement but there has been no response from the company	

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p style="text-align: center;">Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"><div data-bbox="418 856 717 1138" style="text-align: center;"><p>PT Agronusa Investama Management Representative</p><p>Sutanto Thursday, 10 November 2022</p></div><div data-bbox="1023 856 1315 1138" style="text-align: center;"><p>MUTU International Lead Auditor</p><p>Hasiholan Sihombing Thursday, 10 November 2022</p></div></div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Comm	Date of Contact	Response	
						Yes	No
1	Sambas Regency Environmental Service.	Sambas District	-	Via Phone	9 August 2022	✓	
2	Beringin Village	Sambas District	-	Via Phone	9 August 2022	✓	
3	Semanga Jaya Village	Sambas District	-	Direct Interview	9 August 2022	✓	
4	Head of Sentama Lestari Cooperative	Sambas District	-	Via Phone	9 August 2022	✓	
5	3 people of Previous Land Owner	Sambas District	-	Via Phone	9 August 2022	✓	
6	CV Berkat Mandiri Sentosa	Sambas District	-	Via Phone	9 August 2022	✓	
7	Head of Cempaka Biru Cooperative	Sambas District	-	Via Phone	9 August 2022	✓	
8	<i>Kantor Pertanahan</i> (Land Office), Dispute Section	Sambas District	-	Via Phone	9 August 2022	✓	
9	<i>Kantor Pertanahan</i> (Land Office), Section Head of Rights Registration and Determination	Sambas District	-	Via Phone	10 August 2022	✓	
10	<i>Dinas Pertanian dan Ketahanan Pangan</i> (Department of Agriculture)	Sambas District	-	Via Phone	9 August 2022	✓	
11	Manpower and Transmigration Office Sambas Regency	Sambas District	-	Via Phone	9 August 2022	✓	
12	Woman of WILMAR (WoW)	PT Agronusa Investama					
13	<ul style="list-style-type: none"> • SERBUK • SPSI Hukatan • Pelikha 	PT Agronusa Investama					
14	CV. Multi Indah Lestari	Sambas District	-	Via Phone	9 August 2022	✓	
15	CV Pulau Indah	Sambas District	-	Via Phone	9 August 2022	✓	
16	PT Harman Bangun Persada	Sambas District	-	Via Phone	9 August 2022	✓	
17	CV Golden Citra Perkasa	Sambas District	-	Via Phone	10 August 2022	✓	
18	ANI POM <ul style="list-style-type: none"> • 1 Worker in WTP • 1 Worker in EBA • 1 Worker in Water Reservoir • 1 Worker in Housing • 1 Worker in LA • 1 worker in Sterilizer station • 1 worker in Press station • 1 worker in Clarification • 1 worker in Kernel station • 1 worker in Boiler station • 1 worker in engine room • 1 worker in hazardous 	Sambas District	-	Direct Interview	9 to10 August 2022	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Comm	Date of Contact	Response	
						Yes	No
	<p>waste temporary warehouse</p> <ul style="list-style-type: none"> • 1 worker in warehouses • 1 worker ini workshop <p>Ani Estate (Kumpai)</p> <ul style="list-style-type: none"> • 1 Worker of HCV • 2 Worker in Daycare • 1 Worker in Housing • 1 Worker in Rinse House • 1 Worker in Generator warehouse • 1 Tim firefighter • 2 Worker in warehouse • 1 Worker in hazardous warehouse <p>Ani Estate (Senabah)</p> <ul style="list-style-type: none"> • 1 foreman, 3 pesticide sprayer, 1 manual worker in nursery • 1 contractor worker in replanting • 1 foreman & 3 harvester • 1 Operator, 1 Foreman, 7 workers in circle path spraying 						
19	<p>Cempaka Biru</p> <ul style="list-style-type: none"> • 3 Worker in Fertilizer • 3 Worker in Harvesting 				11 August 2022	✓	
20	<p>Sentama Lestari</p> <ul style="list-style-type: none"> • 1 Foreman & 2 harvesters • 2 workers in Manual wood picker • 1 Foreman & 3 workers in Manuring 				11 August 2022	✓	
21	Sawit watch	Bogor, Indonesia	info@sawitwatch.or.id	Email	28 July 2022		✓
22	WWF	Jakarta, Indonesia	wwf-indonesia@wwf.or.id	Email	28 July 2022		✓
23	WALHI	Jakarta, Indonesia	informasi@walhi.or.id	Email	28 July 2022		✓
24	AMAN	Jakarta, Indonesia	rumahaman@aman.or.id	Email	28 July 2022		✓

Appendix 2. Assessment Program

DATE	08 - 14 August 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 08 August 2022		
06.30 – 08.10	JAKARTA → PONTIANAK	All Auditor & ASI
09.00 – 17.00	From the airport in Pontianak to the location of certification unit	All Auditor & ASI
Tuesday, 09 August 2022		
07.00 – 07.30	Opening Meeting Auditor with ASI	All Auditor & ASI
08.00 – 09.00	OPENING MEETING <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	All Auditor Management of PT Agronusa Investama
09.00 – 12.00	<ul style="list-style-type: none"> Stakeholders' consultation to related agencies Stakeholder consultation to affected communities surrounding the plantations, indigenous peoples, local communities and previous land owners Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Smallholders, Third Party Supplier (if any), local NGO (if any) 	All Auditor
12.00 – 14.00	Break	
14.00 – 16.30	Field observation to Agronusa Investama POM <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge) Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect, security post, FFB Sorting, Processing Activity, Despatch CPO) Implementation of Environmental aspect, Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond & land application 	HHS SAS & AFF RAB
16.30 – 17.00	Submission of audit progress	All Auditor
Wednesday, 10 August 2022		
08.00 – 12.00	Field observation to Agronusa Investama Estate Aspect to be verified: <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	HHS SAS RAB & AFF

DATE	08 - 14 August 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
12.00 – 14.00	Break	
14.00 – 16.30	Continue document verification and completing checklist	All Auditor
16.30 – 17.00	Submission of audit progress	All Auditor
Thursday, 11 August 2022		
08.00 – 12.00	Field observation to Sentama Lestari Cooperative Aspect to be verified: <ul style="list-style-type: none"> - Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; - Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect - Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	HHS
08.00 – 12.00	Field observation to Cempaka Biru Cooperative Aspect to be verified: <ul style="list-style-type: none"> - Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; - Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect - Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	HHS
12.00 – 14.00	Break	SAS
14.00 – 16.30	Continue document verification and completing checklist	
16.30 – 17.00	submission of audit progress	
08.00 – 12.00	Field observation to Cempaka Biru Cooperative Aspect to be verified: <ul style="list-style-type: none"> - Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; - Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect - Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	AFF
12.00 – 14.00	Break	AFF
14.00 – 16.30	Continue document verification and completing checklist	
16.30 – 17.00	submission of audit progress	
Friday, 12 August 2022		
08.00 – 11.45	Continue document verification and completing checklist	All Auditor
11.45 – 14.00	Break	
14.00 – 16.30	Continue document verification and completing checklist	All Auditor
16.30 – 17.00	submission of audit progress	
17.00 –	Interim Meeting (closing meeting preparation)	All Auditor
Saturday, 13 August 2022		
08.00 – 10.00	CLOSING MEETING	

DATE	08 - 14 August 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> • Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion) • Comments, Responses and Questions 	All Auditor and Management of Unit Certification
10.00 – 18.00	Travel from PT Agronusa Investama to Pontianak	All Auditor & ASI
20.00 – 21.00	Closing Meeting Auditor with ASI	All Auditor & ASI
Sunday, 14 August 2022		
06.30 – 07.00	Travel from hotel in Pontianak to the airport	All Auditor & ASI
08.55 – 10.25	PONTIANAK → JAKARTA	All Auditor & ASI