

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

[✓] Surveillance

Name of Management Organization : **Lada Palm Oil Mill – PT. Surya Sawit Sejati subsidiary of United Plantations Berhad**
 Plantation Name : **PT. Surya Sawit Sejati – Lada Estate and Runtu Estate**
 Location : **Village of Sungai Rangit Jaya, Sub District of Pangkalan Lada, District of Kotawaringin Barat, Province of Kalimantan Tengah, Indonesia**
 Certificate Code : **MUTU-RSPO/123**
 Date of Certificate Issue : 27 November 2018 Date of License Issue : 27 November 2022
 Date of Certificate Expiry : 26 November 2023 Date of License Expiry : 26 November 2023

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-4	01 to 05 August 2022	Rizliani Aprianita Hasibuan (<i>Lead Auditor</i>), Bayu Yogatama, Arief Tajalli and Alfiany Sukmawati	Ardiansyah	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-4	02 September 2022

TABLE OF CONTENT

FIGURE

Figure 1. Location Map of PT. Surya Sawit Sejati	1
Figure 2. Operational Map of PT. Surya Sawit Sejati	2
Figure 3. Operational Map of PT. Surya Sawit Sejati – Lada Estate	3
Figure 4. Operational Map of PT. Surya Sawit Sejati – Runtu Estate	4
Abbreviations Used	5

1.0 SCOPE of the CERTIFICATION ASSESSMENT

1.1 Assessment Standard Used	6
1.2 Organization Information	6
1.3 Type of Assessment	6
1.4 Location of Mill and Plantations	6
1.5 Description of Area Statement	7
1.6 Planting Year and Cycle	7
1.7 Description of Mill and Supply Base	7
1.8 Estimate Tonnage of Certified Product	8
1.9 Other Certifications	9
1.10 Time-Bound Plan	9

2.0 ASSESSMENT PROCESS

2.1 Assessment Team	11
2.2 Assessment Methodology, Assessment Process and Locations of Assessment	12
2.3 Stakeholder Consultation and Stakeholders Contacted	14
2.4 Determining Next Assessment	14

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification	15
3.2 Conformity Checklist of Certificate and Logo Use	71
3.3 Summary of RSPO Partial Certification	72
3.4 Identification of Findings, Corrective Actions, Observations, Opportunity for Improvement and Noteworthy Positive Components	76
3.5 Summary of Arising Issues from Public and Auditor Verification	80

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

4.1 Formal Signing of Assessment Findings	84
---	----

APPENDICES

1. List of Stakeholders Contacted in the RSPO Certification Process	85
2. Assessment Program	86

Figure 1. Location Map of PT. Surya Sawit Sejati

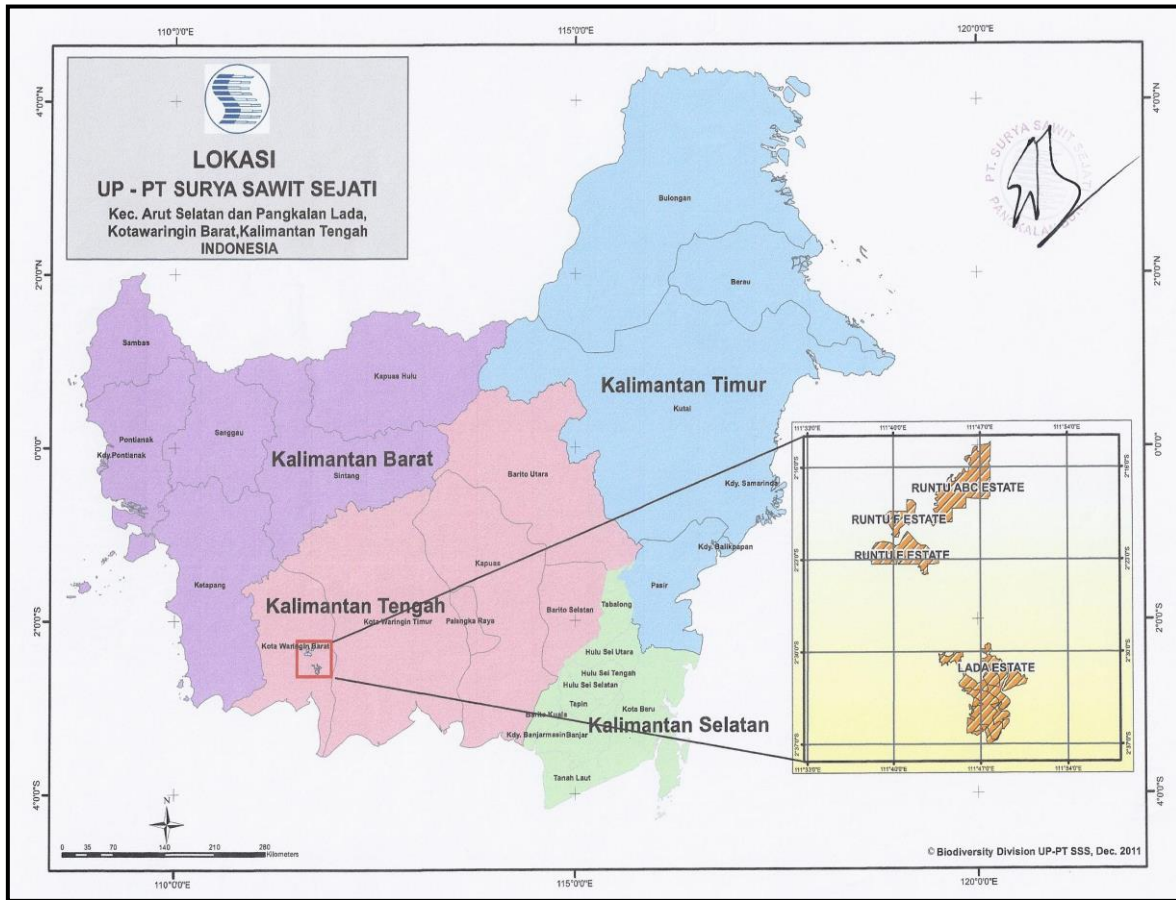


Figure 2. Operational Map of PT Surya Sawit Sejati

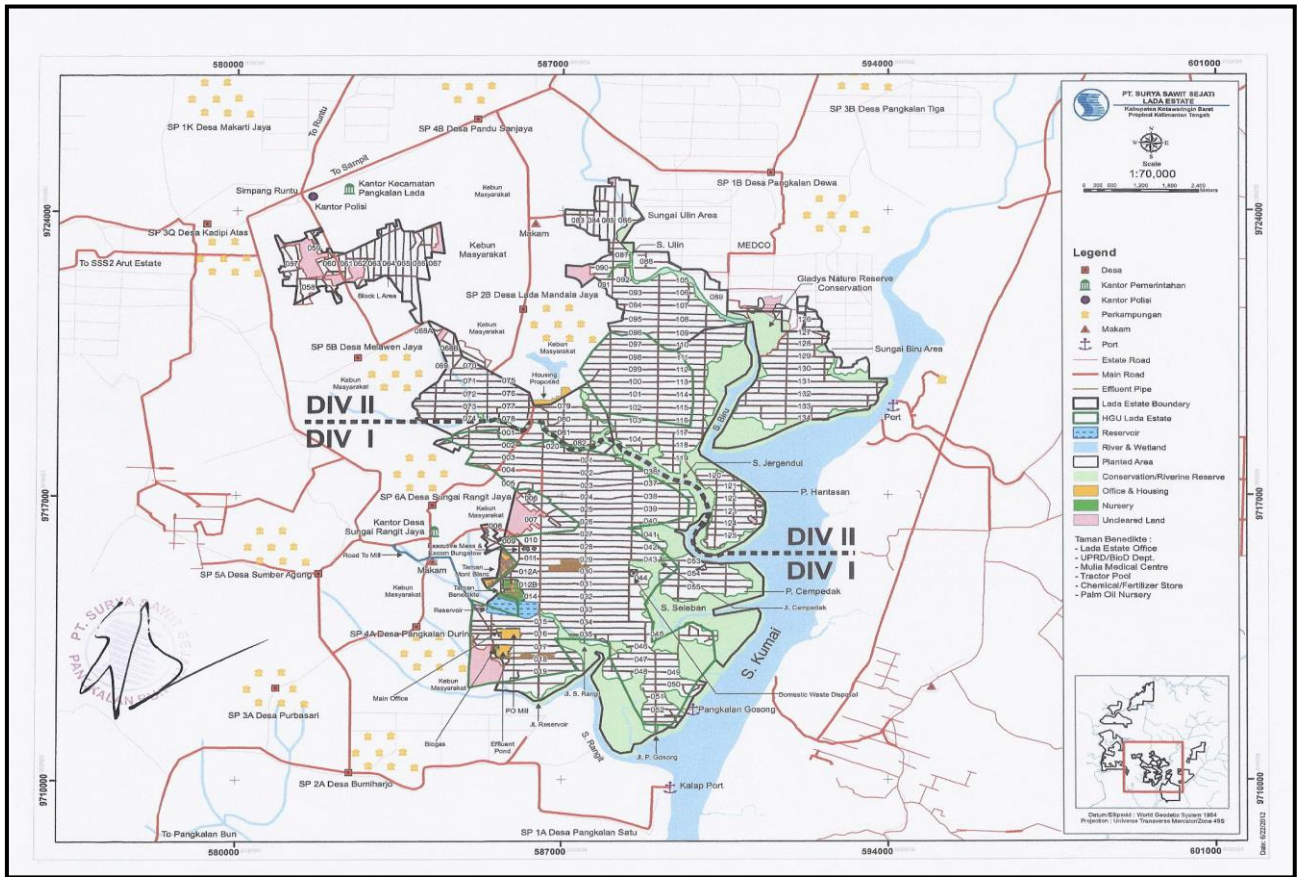
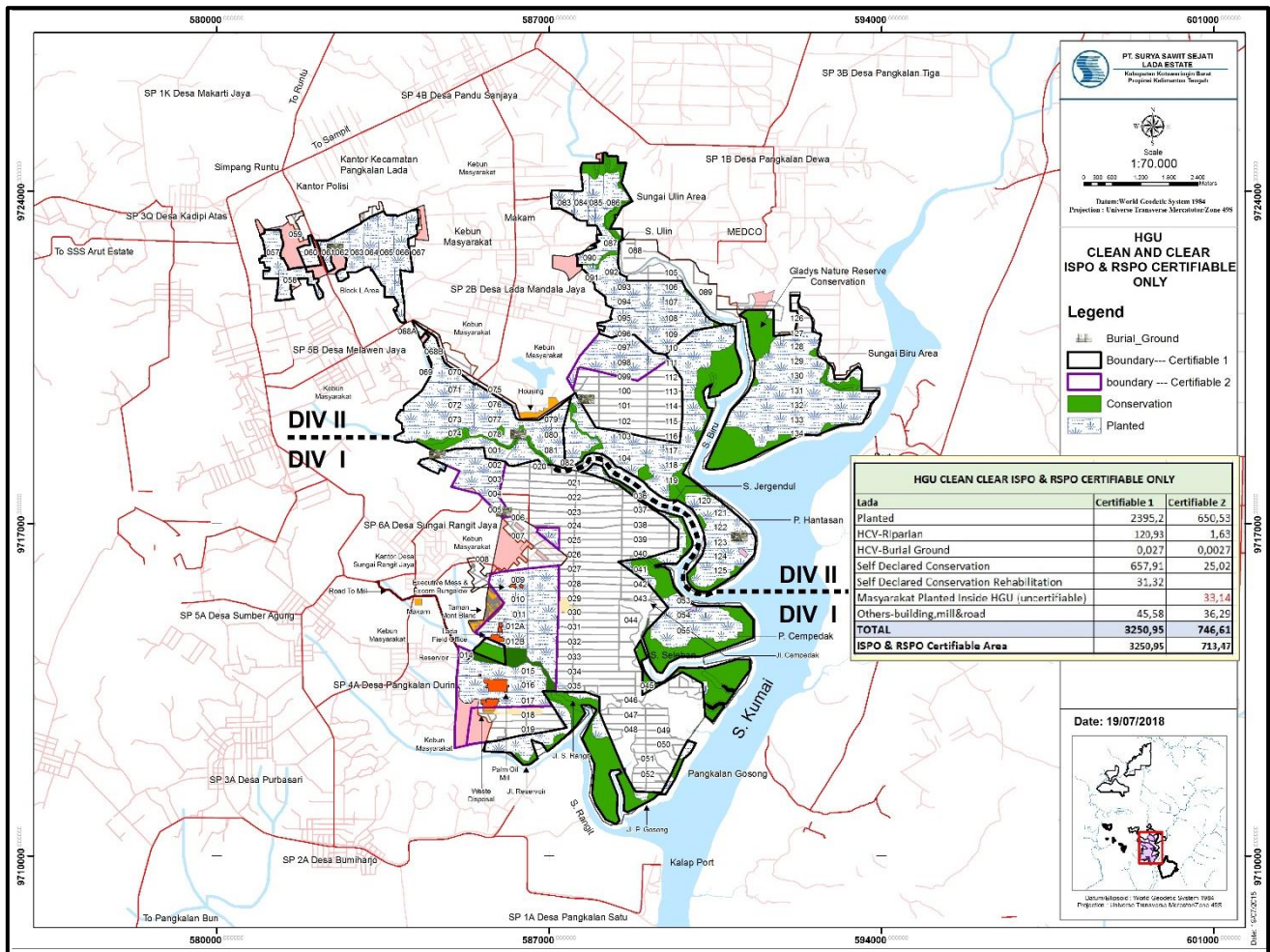
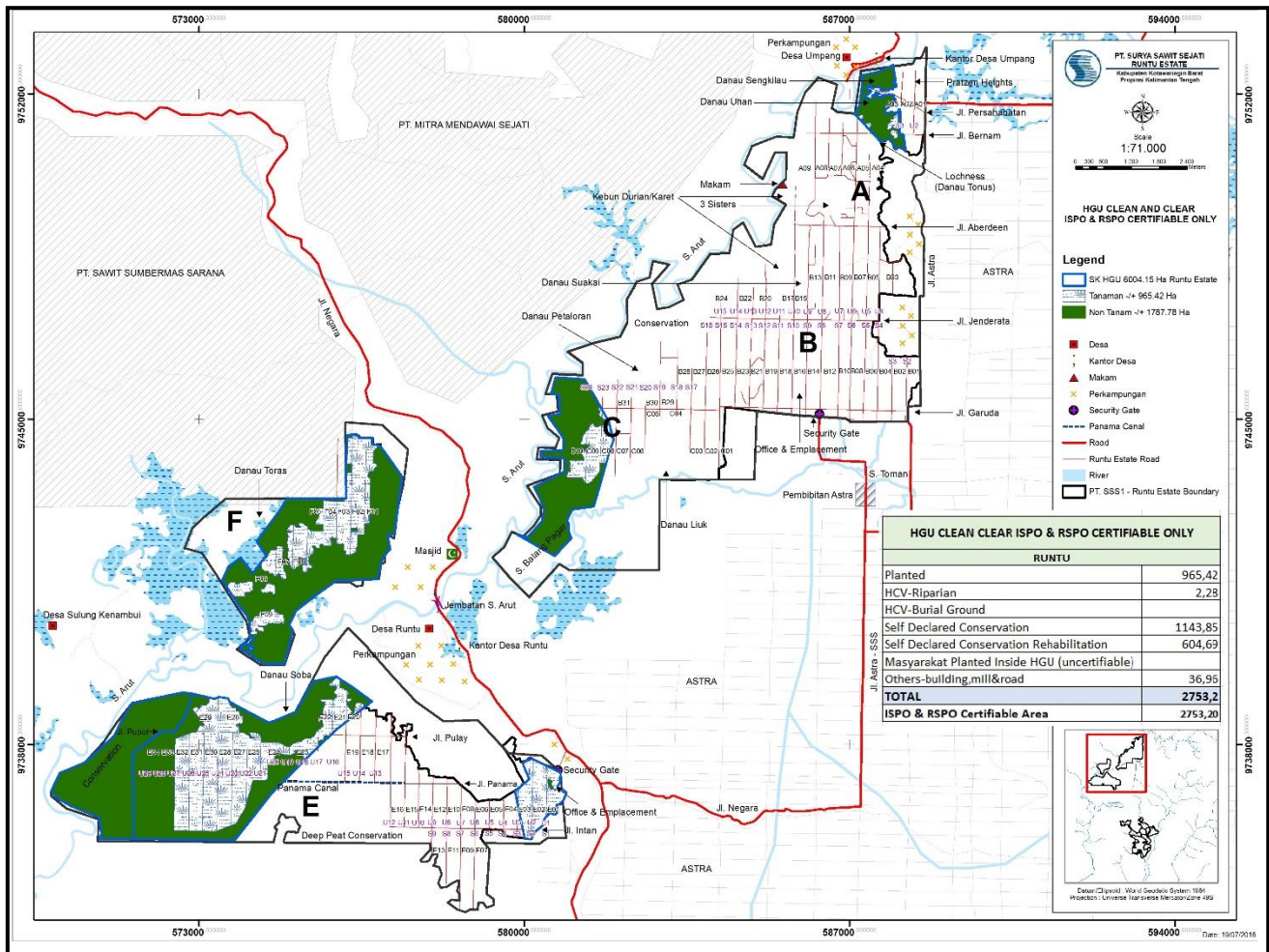


Figure 3. Location Map of PT. Surya Sawit Sejati – Lada Estate



Scope of certification = Color Blue (planted area) and Green (conservation area)

Figure 4. Operational Map of PT. Surya Sawit Sejati – Runtu Estate



Scope of certification = Color Blue (planted area) and Green (conservation area)

Abbreviations Used

ANDAL	:	Environmental Impact Analysis (<i>Analisis Dampak Lingkungan</i>)
AMDAL	:	Environmental Impact Analysis (<i>Analisis Mengenai Dampak Lingkungan</i>)
BOD	:	Biological Oxygen Demand
CEO	:	Chief Executive Officer
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
CV	:	Curriculum vitae
FFB	:	Fresh Fruit Bunch
GPS	:	Global Positioning Systems
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Rights)
ID	:	Identity
kWH	:	Kilo Watt Hour
LA	:	Land application
LUCA	:	Land Use Change Analysis
MB	:	Mass Balance
MSDS	:	Material Safety Data Sheet
MT	:	Metric Ton
OSH	:	Occupational Safety and Health
OSS	:	Online Single Submission
PIC	:	Person in Charge
PK	:	Palm Kernel
POM	:	Palm Oil Mill
PPE	:	Personal Protective Equipment
RKL	:	Environmental Management Plan (<i>Rencana Pengelolaan Lingkungan</i>)
RPL	:	Environmental Monitoring Plan (<i>Rencana Pemantauan Lingkungan</i>)
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, threatened and endangered
SCCS	:	Supply Chain Certification Standard
SOP	:	Standard Operating Procedure
SSS	:	Surya Sawit Sejati
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE OF THE CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used		
		<ul style="list-style-type: none"> Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020. RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020. 	
1.2	Organisation Information		
1.2.1	Organization name listed in the certificate	PT Surya Sawit Sejati subsidiary of United Plantations Berhad	
1.2.2	Contact person	C. Mathews	
1.2.3	Organisation address and site address	RSPO registered company: Jenderata Estate 36009 Teluk Intan, Perak Darul Ridzuan, Malaysia Liaison Office: Sungai Rangit Jaya SP6 Village, Sub-district Pangkalan Lada, PO BOX 1017, District of Pangkalan Bun, Kalimantan Tengah Province 74101	
1.2.4	Telephone	+605 6411411	
1.2.5	Fax	+605 6411876	
1.2.6	E-mail	mathewsc6@gmail.com	
1.2.7	Web page address	www.unitedplantations.com	
1.2.8	Management Representative who completed the application for certification	C. Mathews	
1.2.9	Registered as RSPO member	1-0004-04-000-00, 19 July 2004	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	One (1) POM (Lada Mill) with two (2) supply bases (Lada Estate and Runtu Estate).	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Lada POM	Village of Sungai Rangit Jaya Sp. 6 Sub District of Pangkalan Lada, District of Kotawaringin Barat, Province of Kalimantan Tengah, Indonesia	S 02° 35' 27" E 111° 46' 21"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Lada Estate	Village of Sungai Rangit Jaya Sp.6 Sub District of Pangkalan Lada, District of	S 02° 29' 35" E 111° 43' 23"

		Kotawaringin Barat, Province of Kalimantan Tengah, Indonesia					
	Runtu Estate	Runtu Village, Sub District of Arut Selatan, District of Kotawaringin Barat, Province of Kalimantan Tengah, Indonesia		S 02° 22' 31"	E 111° 41' 22"		
1.5	Description of Area Statement						
1.5.1	Tenure						
	• State			6,717.65	ha		
	• Community			-	ha		
1.5.2	Area Statement						
		Lada Estate	Runtu Estate	Total (ha)			
	Total area	3,964.45	2,753.20	6,717.65			
	Planted area	3,045.74	965.42	4,011.16			
	Mill, Road, Emplacement and Office	81.87	36.96	118.83			
	HCV	836.84	1,750.82	2,587.66			
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (ha)		Total (ha)			
		Lada Estate	Runtu Estate				
	2004	98.20	-	98.20			
	2005	501.98	-	501.98			
	2006	643.74	-	643.74			
	2007	1069.46	-	1069.46			
	2008	732.36	697.18	1429.54			
	2009	-	268.24	268.24			
	TOTAL	3,045.74	965.42	4,011.16			
1.6.2	New Planting area after January 2010		- ha				
1.6.3	Planting Cycle		1 st Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Lada POM	60	719,689.36	156,681.87	21.77	32,317.33	4.49
	<i>*Production data source from November 2019 to July 2022</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (ha)	Production Area (ha)	FFB (ton/year)	Yield (ton/ha/year)	Supplied to Mill	
						FFB (ton/year)	%
	Lada Estate	3,964.45	3,045.74	190,537	20.85	190,537	100
	Runtu Estate	2,753.20	965.42	43,156	14.90	43,156	100
	TOTAL	6,717.65	4,011.16	233,693	19.42	233,693	100
	<i>*Production data source from November 2019 to July 2022</i>						

1.7.3	FFB description from other source				
	Name of sources/Organization (non-certified)	Type of Organization	Number of Smallholders	Production Area (ha)	Supplied to Mill FFB (ton/year)
	Lada Estate	PT Surya Sawit Sejati	-	1883.72	136,214.27
	Runtu Estate		-	2600.17	170,303.78
	Arut Estate (Inti)		-	156.44	14,877.68
	Kumai Estate (Inti)		-	362.63	29,113.69
	Koperasi Karya Tunggal Jaya	Third Parties	-	-	20,248.14
	CV. Inti Sawit Perkasa (Iswanto)		-	-	18,090.61
	PT. Mentobi Makmur Lestari		-	-	6,275.38
	Koperasi Tani Bahagia		-	-	29,479.09
	Koperasi Putra Lamandau		-	-	151.43
	Plasma Lada	Scheme Smallholders	62	136.50	9,683.27
	Plasma Runtu		182	225.17	5,627.32
	Plasma Arut		194	369.13	18,350.22
	Plasma Kumai		-	571.00	27,580.65
	TOTAL				485,995.52
	<i>*Production data source from November 2019 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 (MT)		Actual Certified Product from November 2019 to July 2022 (MT)	
	FFB Processed	254,720		233,693.84	
	CPO Production	59,050		50,650.67	
	Palm Kernel (PK) Production	11,946		10,524.48	
1.8.2	Product selling				
	Type of selling product	Actual selling product for last year (November 2019 to July 2022) (MT)			
	CSPO sold as RSPO certified product	0			
	CSPK sold as RSPO certified product	6,300			
	CSPO sold under another scheme	0			
	CSPK sold under another scheme	0			
	CSPO sold as conventional	46,909.48			
	CSPK sold as conventional	3,602.85			
1.8.3	Estimate of Certified FFB Claim				
	Name of Estates	Total Area (ha)	Production Area (ha)	FFB (tones/year)	Yield (tones/ha/year)
	Lada Estate	3,964.45	3,045.74	80,500	26.43
	Runtu Estate	2,753.20	965.42	20,500	21.23
	TOTAL	6,717.65	4,011.16	101,000	24.93
	<i>*Projected FFB production for 12 months of certificate</i>				
1.8.4	Estimate of Certified Palm Product Claim				

Name of Mill	Capacity (tones/ hour)	FFB Processed (tones/year)	CPO		Palm Kernel		Supply Chain Module
			Out put (tones)	Extraction (%)	Out put (tones)	Extraction (%)	
Lada POM	60	101,000	21,210	21	4,545	4.5	MB

**Projected CSPO and CSPK production for 12 months of certificate*

1.9 Other Certifications

ISO 9001:2008	-
ISO 14001: 2004	-
OHSAS 18001:2007	-
ISCC	-
ISPO	MUTU-ISPO/167 dated 22 August 2019 until 21 August 2024

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						
Lada POM (PT Surya Sawit Sejati)	2016	Lada Estate	713.47 ha (Division 1)	2017	Kotawaringin Barat District, Kalimantan Tengah Province	Certified
			3,250.95 ha (Division 1 & 2)	2019	Kotawaringin Barat District, Kalimantan Tengah Province	Certified
			1,769.00 ha + 740.21 ha (Division 1 & 2)	2023*	Kotawaringin Barat District, Kalimantan Tengah Province	-
		Runtu Estate	2,753.20 ha (Division North & South)	2019	Kotawaringin Barat District, Kalimantan Tengah Province	Certified
			4,773.66 ha + 1,373.14 ha (Division North & South)	2023**	Kotawaringin Barat District, Kalimantan Tengah Province	-
		<i>Farmers own land and also new permit for Plasma in Arut</i>	1,364 ha Plasma is subject to issuance of land title for the	2023***	Melawen Village and Lada Mandala Jaya Village, Pangkalan Lada Sub-District	-

		<i>and Kumai Estate</i>	members and SK Bupati.		Medang Sari Village, Sub-District Arut Selatan Kotawaringin Barat District, Kalimantan Tengah Province	
<p>* Partial HGU is in progress. **Land Swap/Pelepasan HP/HPK subject to the issuance of SK land swap/pelepasan by the <i>Kementerian Lingkungan Hidup dan Kehutanan</i>. (Government of Indonesia). ***Subject to issuance of land title for the members and <i>SK Bupati</i>. **** <i>Hak Pakai</i>- work is in progress.</p>						
Malaysia						
Jenderata POM	2008	Jenderata Estate, Seri Pelangi Estate, Ulu Basir Estate, Ulu Bernam Estate, Sungai Ering Estate, Sungai Chawang Estate, Changkat Mentri Estate, Lima Blas Estate	2008	Teluk Intan, Perak Darul Ridzuan, Malaysia	Certified	
	2022	Tanarata Estate (supply base of Jendarata POM upon RSPO certified)	2022	Jalan Batu 7, Mukim Changkat Jong, 36008 Teluk Intan, Perak Darul Ridzuan, Malaysia	-	
Ulu Basir POM	2008	Jendarata Estate, Seri Pelangi Estate, Ulu Basir Estate, Ulu Bernam Estate, Sungai Ering Estate, Sungai Chawang Estate, Changkat Mentri Estate, Lima Blas Estate	2008	Teluk Intan, Perak Darul Ridzuan, Malaysia	Certified	
Ulu Bernam POM	2008	Jendarata Estate, Seri Pelangi Estate, Ulu Basir Estate, Ulu Bernam Estate, Sungai Ering Estate, Sungai Chawang Estate, Changkat Mentri Estate, Lima Blas Estate	2008	Teluk Intan, Perak Darul Ridzuan, Malaysia	Certified	
UIE POM	2008	UIE Estate	2008	Pantai Remis, Perak Darul Ridzuan, Malaysia	Certified	
<p><i>Time bound plan updated in 6 May 2022.</i> *The date of acquisition for Tanarata Estate is 17th August 2019. In compliance with the RSPO P&C Certification System, United Plantations Berhad anticipate to conduct the RSPO Scope Extension Assessment for Tanarata Estate within three (3) years, which is in August 2022.</p>						
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard					
	<p>There are no associated smallholders/ outgrowers supplying FFB to the mill in Malaysia. However, for Lada POM, there are associated plasma smallholders (Lada, Runtu, Arut, Kumai) and (4) four unassociated independent FFB suppliers. All outgrowers and smallholders is still on preparation process due to land title issuance from the related agencies. Internal audit result has been verified by auditor team.</p>					

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-4	<ol style="list-style-type: none"> Rizliani Aprianita Hasibuan (Lead Auditor). Indonesian citizen. Bachelor of Agribusiness and Master of Agribusiness, Faculty of Agriculture. She has been participated in several trainings including Lead Auditor ISO 9001:008, ISO 14001:2004, OHSAS 18001, SA8000 Training, ISPO Auditor training, RSPO Lead Auditor training, SCCS, RSPO Social Training (Verite) and in several IHT in the field of environmental, BMP, and so on. She has participated in several audit activities related to sustainable palm oil plantation certification system since 2015 with social aspects, OHS, worker welfare, environmental management, legality and conservation. In this audit activity, she verifies social, worker welfare, transparency and OHS aspects. Bayu Yogatama (Auditor) Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism, Bogor Agricultural University. Has attended the ISO 9001: 2015 Quality Auditor / Lead Auditor Course Quality Management System (QMS) course and ISO 19011: 2011 Guidelines for Auditing Management System, ISPO Lead Training, SA 8000, RSPO Lead Training, SCCS, IHT RSPO NPP, IHT RSPO RaCP, IHT ISO 17021, IHT ISO 17065, and IHT Best Management Practice. Having experience working in plywood field as Inspector in foreign private company. Currently working for an independent certification body. During this assessment has verified BMP, long term management plan and SCCS. Arief Tajalli (Auditor). Indonesian citizen, Bachelor of Forest Resources Conservation and Ecotourism, Faculty of Forestry, Bogor Agricultural University. Has been involved as a researcher at a wildlife laboratory, Faculty of Forestry, IPB, and at NGO as expert staff of social and forestry. The trainings that have been attended include training for ISO 9001; 2008, ISO 14001; 2004, ISO 17021; 2015, ISO 17065, ISO 19011, training for conceptual model and stakeholder mapping, and ISPO Auditor training by Mutu Institute and RSPO Auditor Training by Checkmark, also participating in several IHT in the field of environment, BMP, and so on. Has participated in several audit simulation activities related to the sustainable palm oil certification system since 2020 with social, environmental, GHG, and waste management aspect. During this assessment, he verified the legal and social aspects. Alfiyany Sukmawati (Auditor Trainee). Indonesian Citizen. Bachelor of Public Health, major in Environmental Health, University of Indonesia. Has attended training in AMDAL A & B, ISO 14001 auditor training, OSHAS, ISO 9001 auditor training, Awareness ISO 17021, Awareness ISO 17065, Awareness ISO 9001, Awareness ISO 45001, and Awareness ISO 19011. Has participated in several simulations of audit activities related to the certification system for sustainable palm oil plantations with environmental aspects. During the audit, she verified environment aspect, waste management, GHG and conservation aspect under supervised by Lead Auditor
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-4	<p>Number of auditors: 3 auditors and 1 trainee auditor. Number of days for ASA-2 & ASA-3 Onsite Audit: 5 days Number of working days for ASA-2 & ASA-3 Onsite Audit: 15 Working days</p>
2.2.2	Assessment Process
ASA-4	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Surya Sawit Sejati to the requirements of Principles and Criteria for the Production of Sustainable Palm Oil 2018, Endorsed by the RSPO Board of Governors on 20th 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.</p> <p>The audit program is included as Appendix 2. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.</p>

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

Some opportunities for improvement of the results **ASA-2; ASA-3 & ASA-4** delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **ASA-2 & ASA-3**.

The auditor's journey from the airport in Pangkalanbun to the audit location takes about 3 hours. The opening meeting was held on 01 August 2022. As for the participants who attended the opening meeting included the Regional Head, General Manager Estate, Estate and Mill Managers, Support Team and other staff at PT Surya Sawit Sejati. Closing meeting was held on 05 August 2022 attended by the same participants as the opening meeting. Management PT Surya Sawit Sejati accept all the onsite ASA-2 & ASA-3 audit results.

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

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

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

The assessment program please find Appendix 2

2.2.3	Locations of Assessment
ASA-4	<p>The sampling location consider the issue arise 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>Lada POM</p> <ul style="list-style-type: none"> • Security posts. Interview with security regarding work procedures, emergency response, worker welfare, and the implementation of OHS in the factory. • Weighbridge. Interview with workers regarding supply chain aspects and worker welfare. • CPO delivery station. Interview with 1 worker regarding work procedures, worker welfare, and the implementation of OHS in the factory. • Grading Station. Observations and interviews related to work procedures, safety aspects, worker welfare etc. • WWTP. Observations on liquid waste management in Mill, OHS implementation and the environment. • Biogas Installation. Observation and interviews on waste management, OHS implementation and the environment. • EFB Area. Observations on aspects of OHS and waste management

- **Hydrant simulation.** Observations related to equipment completeness, speed of emergency handling, and system feasibility.
- **Workshop.** Observations related to the condition of the workshop warehouse, as well as the implementation of OHS and environmental aspects.

Lada Estate

- **Block 78 Cemetery HCV Area.** Observations related to HCV management.
- **Riparian HCV Area Block 32 / 78 / 119 / 120.** Observations related to HCV management and potential pollution.
- **Mangrove Forest HCV Area Block 43.** Observations related to HCV management and potential pollution.
- **HGU Boundary No. BPN 47 and BPN 48 Block 19.** Observation of the condition and position of legal boundaries.
- **HGU Boundary No. BPN 21 Block 53.** Observation of the condition and position of legal boundaries.
- **HGU Boundary No. BPN 14 Block 21.** Observation of the condition and position of the legal boundary.
- **HGU Boundary No. BPN 79, BPN 80 Block 115/116.** Observation of the condition and position of legal boundaries.
- **Block 18 Fire Monitoring Tower.** Pay attention to its condition and position.
- **Workshop.** Field observations related to the condition of the workshop warehouse, as well as the implementation of OHS and environmental aspects.
- **Fuel Storage.** Field observations and worker interviews regarding the implementation of OHS, environmental aspects, and material handling.
- **Hazardous Waste Storage.** Field observations on the implementation of OHS and handling of hazardous waste.
- **PPE warehouse.** Field observations related to the availability of PPE, and warehouse management.
- **Agrochemical Warehouse.** Field observations and worker interviews regarding the implementation of OHS, environmental aspects, and material handling.
- **Pesticide Packaging Rinse and Pesticide Mixing Place.** Field observations and worker interviews regarding the implementation of OHS, environmental aspects, and material handling.
- **Rinse House and Spray PPE Storage.** Field observations of worker facilities for PPE storage and rinse activities.
- **Clinic.** Field observations on aspects of health services for workers and the community, and implementation of OSH and environmental impacts.
- **Daycare.** Observations and interviews on facilities, access to clean water, sanitation, building feasibility, and OHS.
- **Emplacement Area.** Observations and interviews on housing facilities, access to clean water, sanitation, and building feasibility.
- **Domestic Waste Selection Area and Composting Area.** Field observations related to waste management, OHS and environmental aspects.
- **Firefighting Equipment Warehouse.** Observations and interviews on the completeness of equipment and warehouse management.

Runtu Estate

- **Riparian HCV Area Block E25.** Observations related to HCV management.
- **Peat HCV Area in Block E16.** Observations related to HCV management and potential pollution.
- **E6 / E23 / E32 Block Restoration Area.** Observations related to HCV management and conservation efforts.
- **Forest plant nursery area Block E25.** Observations related to management and conservation efforts.
- **HGU Boundary No. BPN 03 and BPN 04 Block E03.** Observation of the condition and position of legal boundaries.
- **HGU Boundary No. BPN 26B Block E29.** Observation of the condition and position of legal boundaries.
- **HGU Boundary No. BPN 14 Block E20.** Observation of the condition and position of legal boundaries.
- **Block E24 Fire Monitoring Tower.** Pay attention to its condition and position.
- **Hazardous Waste.** Field observations on the implementation of OHS and handling of hazardous waste.
- **Pesticide Mixing Area.** Field observations and worker interviews regarding the implementation of OHS, environmental aspects, and material handling.
- **Agrochemical Warehouse.** Field observations and worker interviews regarding the implementation of OHS, environmental aspects, and material handling.
- **PPE Warehouse.** Field observations related to the availability of PPE, and warehouse management.
- **Spare Part Warehouse.** Field observations related to the availability of PPE, and warehouse management.

	<ul style="list-style-type: none"> • Oil Warehouse. Field observations and worker interviews regarding the implementation of OHS, environmental aspects, and material handling. • Emplacement Area. Observations and interviews on housing facilities, access to clean water, sanitation, and building feasibility. • Water Treatment Plant for Emplacement Area. Field observations and interviews on clean water treatment, OHS and environmental aspects. • Domestic Waste Selection Area and Composting Area. Field observations related to waste management, OHS and environmental aspects.
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
	<p>Summary of stakeholder consultation process Consultation of stakeholders for PT Surya Sawit Sejati was held by:</p> <ol style="list-style-type: none"> 1. Public Notification on website MUTU International on 11 July 2022 2. Public consultation with NGOs (by email) such as WALHI, WWF, Sawit Watch and AMAN on 20 July 2022. 3. Public consultation by phone with government institution on 2 August 2022. 4. Public consultation meeting with communities on 2 August 2022. 5. Public consultation meeting with internal stakeholders and contractors on 2 August 2022. <p>Numbers of input from stakeholders were clarified by PT Surya Sawit Sejati.</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit will be conducted eight (8) months to twelve (12) month after date of annual license.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Lada POM PT Surya Sawit Sejati subsidiary of United Plantations Berhad operation consisting of one (1) mill and three (2) oil palm estates.

During the assessment, there was no nonconformity were assigned against Major Compliance Indicators and one (1) opportunity for improvement were identified. Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5.

MUTUAGUNG LESTARI found that Lada POM PT Surya Sawit Sejati subsidiary of United Plantations Berhad 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	<p>The company can show the procedure for requesting information based on the SOP for Requests for Information/Documents by Stakeholders No. SOP-HRD-03-R00 which was ratified since January 1, 2014. The procedure explains, among others:</p> <ul style="list-style-type: none"> • HR Department receives requests for information from inside and outside the company and is studied. • Record all document requests and make an application letter to the company management for each incoming request. • Requests for information will be responded to within a minimum of 7 days and a maximum of 30 days after the request is received. • Company management gives approval to the HR Department to respond to requests for information by coordinating with the legal division. • The legal division receives document requests from the HR department and records them in the document issuance book. • HR department receives documents that have been registered by the legal division and submits responses to requests for information to document requesters. • The company will respond to each request for information 7 days after the request for information comes to the company and a maximum of 30 days. <p>PT Surya Sawit Sejati also has a list of documents that can be accessed by the parties (stakeholders) as follows:</p> <ul style="list-style-type: none"> • Land rights • Occupational health and safety plan. • Plans and assessments relating to the socially impacting environment. • Environmental conservation and management documents. • Pollution prevention and reduction plans. • Complaints and complaints document plan. • Continuous improvement plan.

- Publication of RSPO assessment results certification.
- Policies on human rights.
- As well as other mandatory reports.

These documents can be accessed by the parties in general without having to ask for management approval because these documents are disseminated in a documented manner to stakeholders (government agencies, local communities, trade unions and others).

Based on the results of interviews with representatives of the Food Crops, Horticulture and Plantation Service, the Environmental Service of Kotawaringin Barat Regency and the results of interviews with representatives of Sungai Rangit Jaya Village and Runtu Village, it is known that Stakeholder Meetings are usually held annually, one of which conveys the procedure for requesting information. For the years 2020-2021, it has not been implemented due to the Covid-19 pandemic. Thus, it can be concluded that the company already has an SOP for information services to stakeholders.

1.1.2

The unit of certification can show evidence that information has been received in an appropriate form and language regarding stakeholder involvement, rights and obligations of the company that is conveyed to all relevant stakeholders, such as:

- Plantation Business Development Report (LPUP) submitted to the Department of Food Crops, Horticulture, and Plantation of Kotawaringin Barat Regency, January 8, 2022.
- Plantation Business Development Report (LPUP) submitted to the Plantation Office of Kalimantan Tengah Province and the Director General of Plantations (Jakarta), January 10, 2022.
- Report on the Use and Utilization of HGU for the 2021 Period submitted to the Kotawaringin Barat Regency Land Office on January 10, 2022.
- Data Report on Plans and Realization of Smallholders / Plasma Development for the period of June 2022 which was reported to the Plantation Office of Kalimantan Tengah Province on July 5, 2022.

1.1.3

The company has a system for dealing with complaints contained in several documents, including:

- SOP for communication and stakeholder consultation with no. SOP SSS-01-HMS-15.
- SOP for Internal and External Complaints No. SOP-HRD-07-R00.
- SOP for Settlement of Land Disputes No. SSS-COMDEV(HMS)-024.

Based on the SOP for providing information/documents by stakeholders, the company will respond to each request for information 7 days after the request for information enters the company and a maximum of 30 days. A commitment has been shown regarding the reporting of violations (whistleblower) signed by the President Director on December 13, 2017. In point 4 it is stated: "If the complainant does not want to know his identity, then the company will keep the identity a secret, unless required by the court".

Based on interviews with management. there is an officer who is responsible for receiving complaints or complaints, namely the company's Public Relations Division. The company then shows the recorded complaint documents from internal and external stakeholders, based on the analysis of the complaint documents for the last 3 months period, there are no complaints from stakeholders. Most of the incoming letters are requests for information and requests for assistance. Based on interviews with representatives of Sungai Rangit Jaya Village, it is known that stakeholders have no complaints submitted to the company.

1.1.4

Records related to requests for information and responses to them are listed in the Incoming Mail Logbook document. The document informs the sender, a summary of the information in the letter, the date and number of the letter. The company also documents response information in the form of a Disposition Sheet document. Based on the results of the verification of these documents, for the period January – August 2022, information was obtained that most of the incoming letters were requests for assistance from nearby villages as well as invitations for activities from local agencies and agencies.

Examples of responses to requests for information from stakeholders include an incoming letter from Arut Selatan District dated June 17, 2022 regarding a request for mediation on land issues in Kenambui Village. The company then showed its response to the letter through a Disposition Sheet document through letter No. 133/HRD/EKS/UP.PT.SSS/VI/2022 which was submitted to

stakeholders on June 17, 2022. To follow up on the request, the company represented by the Public Relations and Legal Division immediately responded and made a site visit on the same day.

The company also routinely conducts socialization related to complaints and complaints procedures which can be proven through the minutes of socialization activities to employees on January 22, 2022 and to Rangkit Village on February 24, 2022. Based on interviews with community representatives of Sungai Rangit Jaya Village and Runtu Village, it is known that stakeholders often ask the company for information and assistance and the company always responds to requests for information quickly.

1.1.5

The company has shown an updated list of stakeholders as of July 2022 for PT SSS which consists of legal entities, indigenous peoples, local communities, workers' organizations, FFB suppliers, and contractors. The document contains a list of names, types of relevant stakeholders and stakeholder contacts. The following is a summary of the contents of the document:

- Legal Entities: consist of government agencies (Provincial/Regency government offices, Police, Danramil, Camat, Jamsostek, BPJS Health, and the Fire Department).
- Local Community: consists of community leaders and village/hamlet government.
- Workers' Organizations: consisting of Trade Unions, Gender Committee, Coordinator of Safety Management, and Emergency Response Management.
- FFB suppliers: consisting of plasma cooperatives, independent smallholders and external FFB suppliers.
- Contractors: consist of service contractors, hazardous waste carriers, and so on.

Based on the stakeholder list document, it is known that these contacts can be contacted through interviews with representatives of internal and external stakeholders, for example interviews with the Manpower Office of Kotawaringin Barat Regency. The results of the interview can be seen in section 3.5 regarding the summary of issues arising from public and auditor verification. From the results of interviews via telephone with stakeholders referring to the list, it can be connected and the information found is valid.

Status: Comply

1.2

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

1.2.1

The company shows the document "Policy on the Code of Business Conduct and Ethics" in which the document states that the company has implemented ethical and responsible business policies and practices in all aspects of the company's operations. The explanation of the document can be described as follows:

Standard of Behavior

- Obeying the Law
- Consumer
- Shareholders
- Business partner
- Community Engagement
- Environment
- Competition
- Integrated Business and Corruption Issues
- Conflict of Interest

The company has shown socialization related to the code of ethics, for example:

- Policy dissemination on ethical behavior guidelines on 27 June 2022 to 14 workers
- Dissemination of policies on ethical behavior guidelines on 31 July 2022 to 10 workers

The policy also has been disseminated to stakeholders. Based on interview with workers and contractor, it's known that they had a good understanding towards code of ethic policy. Based on explanation above, company has policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.

1.2.2

The system to monitor compliance with ethical policies is carried out through monitoring complaints. The Company has grievance

procedures such as Violation Reporting Mechanism which presented in document No. SOP SSS-EST-30 dated December 23, 2017 to submit complaints or violation including violations of the code of ethics. From the results of the verification of the complaint document, it is known that there were no complaints related to violations of ethical behavior.

In addition, the company also routinely conducts internal audits every year covering aspects of the RSPO including ethical behavior. The RSPO internal audit conducted on 20 January – 5 February 2022. And from the results of the internal audit conducted, there is 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 Lada POM certification unit is under the company PT Surya Sawit Sejati, in fulfilling compliance, the company has complied with all relevant laws and regulations, namely by having the following documents:

Compliance with Legal Aspect:

- Decree of the Head of Plantation Office of Kalimantan Tengah Province No. 188.43/526/PUPKP3/DISBUN dated March 15, 2019 regarding the Determination of Follow-up Suggestions for increasing the business class of PT Surya Sawit Sejati oil palm plantations in Kotawaringin Barat Regency, Kalimantan Tengah Province in 2018, in the attachment it is stated that Garden Class: Class I (Excellent).
- Plantation Business Permit for Processing (IUP-P) for PT Surya Sawit Sejati, Decree of the Kotawaringin Barat Regent No. Ekbang/525.26/102/EK/2010 dated 28 April 2010. Location of Pangkalan Lada and Arut Selatan Subdistricts Sungai Rangit Jaya Village, Umpang and Suayap, Kotawaringin Barat Regency, Kalimantan Tengah. Plantation area **15,650 Ha** Factory Capacity **60 Tons FFB/Hour**.
- HGU Decree from the National Land Agency No: 81/HGU/BPN/2005 dated July 4, 2005, located in Lada Mandala Jaya Village and Sungai Rangit Jaya Village, expiry date of 24 September 2040. Measurement Letter Number 1 dated 8 April 2005 with an area of **2,508.472 Ha**. Valid for HGU Certificate number 42.
- HGU Decree from the State Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency No. 1/HGU/KEM-ATR/BPN/2018 dated January 2 2018, Locations in Sungai Rangit Jaya Village, Pangkalan Durin Village, Sungai Melawen Village, Lada Mandala Jaya Village, Pangkalan Dewa and Pandu Sanjaya Village, Pangkalan Lada District, and Runtu, Kenambui and Umpang Villages, Arut Selatan District, valid until January 1, 2053 with a total area of **6,004.15 Ha**. Valid for HGU Certificates number 58 – 74 (18 certificates).
- HGB Decree from the Head of the Kotawaringin Barat Regency Land Office No. 01/HGB/BPN/62.01.2016 dated 30 June 2016 and HGB Certificate No. 02 dated 11 July 2016 on a land area of **1.651 Ha** located in the Village/Pangkalan Durin District with the expiry date of the rights until 24 September 2046.

Worker Welfare Aspect:

The determination of wages at PT Surya Sawit Sejati is based on the minimum wage in Kotawaringin Barat District based on the Decree of the Governor of Kalimantan Tengah No. 188.44/445/2021 on November 30, 2021. The Minimum Wage for Kotawaringin Barat District in 2022 is Rp. 3,077,218. Related to this, the company has Memo No. 415/HRD/INT/UP-PT.SSS/XII/2021 dated December 23, 2021 regarding the District Minimum Wage of Kotawaringin Barat 2022 amounting to Rp. 3,077,218

Environmental Aspect:

- **Lada POM and Lada Estate.** *Dokumen Analisis Dampak Lingkungan (AMDAL)* for PT Surya Sawit Sejati's Palm Oil Plantation and Processing Mill activities located in Sungai Rangit Jaya Village, Lada Mandala Jaya and Pangkalan Durin, Pangkalan Lada District, Kotawaringin Barat Regency through the Decree of the Kotawaringin Barat Regent No. 660/580/Bpdl-II.2/XII/2007 concerning Environmental Feasibility of Plantation and Palm Oil Processing Factory Development PT Surya Sawit Sejati was stipulated on December 1, 2007 with an area of 6,650 ha, factory capacity of 60 tons of FFB/hour
- **Runtu Estate.** *Dokumen Analisis Dampak Lingkungan (AMDAL)* for PT Surya Sawit Sejati for Oil Palm Estate activity in Villages of Rangda, Sulung Kenambui, Runtu, and Umpang, subdistrict of Arut Selatan, Kotawaringin Barat, Kalimantan Tengah Province. Approved bt Regional AMDAL assessing board of Kotawaringin Barat Regency No. 656/359/Bpdl-

II.2/VII/2007 with total area 9.000 ha through the approval from government of Kotawaringin Barat Regency, Regional Environmental Impact Controlling Agency No. 660/359/Bpdl-II.2/VII/2007 dated July, 27 2007.

- **Biogas Instalation** Environmental Permit for Biogas Installation of PT Surya Sawit Sejati in Sungai Rangit Jaya Village, Pangkalan Lada District, Kotawaringin Barat Regency through the Decree of the Kotawaringin Barat Regent No. 660/15/BLH/XII/2012 dated December 12, 2012
- **Disposal of Domestic Liquid Waste Permit** through the Permit for Disposal of Domestic Liquid Waste PT Surya Sawit Sejati in Sungai Rangit Jaya Village SP. VI, Pangkalan Pepper District, Kotawaringin Barat Regency, Kalimantan Tengah Province with No. 660/822/DLH.4/IPLCD/VII/2019 from the Kotawaringin Barat Regent dated 1 July 2019, which is valid until 30 June 2024.
- **Permit for Utilization of Liquid Waste for Land Application (LA)** based on Permit for Utilization of Liquid Waste on Soil to Palm Oil Plantation PT Surya Sawit Sejati through the Head of the One Stop Integrated Investment Office of Kotawaringin Barat Regency No. 503/103/LH/DPMPSTSP.D dated May 13, 2019.
- **Reports on the Management of Protected Areas and High Conservation Values**, including the 2021 rehabilitation activities of PT Surya Sawit Sejati which were reported to BKSDA SKW II of Kotawaringin Barat Regency in Pangkalan Bun, Kalimantan Tengah BKSDA, Kotawaringin Barat KPHP, and Head of Kalimantan Tengah Forestry Service on 22 July 2022 with No. 156/HRD/EKS/UP-SSS/VII/2022.

Best Management Practices Aspects:

In best management practices, it is known that plantation and mill management has implemented some compliance with Indonesian laws and regulations. For example, not using the burning method in the land clearing process and implementing integrated pest control, biological control and only uses pesticides that are listed on the pesticide government website.

2.1.2

The company has had a system to identify the legal requirement related to plantation business. All requirement documented in regulation list that set by Human Resources and General Affair Department. It kept in mill and estate office. To ensure all operational activities in accordance with applicable regulations, they update the regulations and implementation also every semester. Whole process performs by Human Resources and General Affair Department. The RSPO internal audit conducted on 20 January – 5 February 2022. And from the results of the internal audit conducted, there is no indication of a violation of ethical behavior.

2.1.3

The company has a procedure for monitoring and maintaining HGU boundary markers as stated in the SOP Restriction Number SSS-EST-06 dated December 10, 2017. The procedure states that maintenance is carried out by Managers and Assistants where monitoring of HGU boundaries must be carried out at least once a year.

The company can show a map of the location and coordinates of where the HGU boundary markers are located, obtained from BPN. All HGU stakes that have been installed and based on the results of field observations to the location of the stakes indicate that all the stakes visited have been installed according to the given coordinates. The company also shows documents for monitoring HGU stakes carried out in 2021 and 2022 which are carried out every month. The stake maintenance report has fully informed the stake number, plan and realization of stake maintenance, location of stake, coordinates of stake, and documentation of the condition of the stake. In the monitoring report, it is known that there are several stakes that cannot be found and cannot be accessed, this is because some of the installation areas of the stakes are currently in a flooded condition. The company can also show documents related to the number of stakes in each HGU plot of land with the following details:

Lada Estate

- Map of land parcels No. 28-15.06-2016 (90.42 Ha) there are 108 stakes
- Map of land parcels No. 106-15.06-2016 (222.90 Ha) there are 109 stakes
- Map of land parcels No. NIB 15.06.00.00.00079 (464.0 Ha) there are 40 stakes
- Map of land parcels No. 101-15.06-2016 (480.10 Ha) there are 63 stakes
- Map of land parcels No. 32-15.06-2016 (588.8 Ha) there are 59 stakes
- Map of land parcels No. 33-15.06-2016 (678.4 Ha) there are 87 stakes
- Map of land parcels No. 34-15.06-2016 (328.4 Ha) there are 46 stakes
- Map of land parcels No. 35-15.06-2016 (103.64 Ha) there are 37 stakes
- Map of land parcels No. 36-15.06-2016 (261.7 Ha) there are 48 stakes

- Map of land parcels No. 85-15.06-2016 (10.62 Ha) there are 7 stakes
- Map of land parcels No. 86-15.06-2016 (22.01 Ha) there are 5 stakes

Runtu Estate

- Map of land parcels No. 37-15.06-2016 there are 28 stakes
- Map of land parcels No. 38-15.06-2016 there are 29 stakes
- Map of land parcels No. 102-15.06-2016 there are 56 stakes
- Map of land parcels No. 39-15.06-2016 there are 21 stakes

Field observations on several samples of HGU boundary markers in Lada Estate, namely BPN number 47, 48, 25, 14, 79, and 80, as well as HGU markers in Runtu Estate, namely BPN stake number 03, 04, 14 and 26b indicate that HGU boundary markers samples are available in the field and in a well-maintained condition and monitored routinely. Verification using GPS shows that the coordinates of the stake location are in accordance with the HGU certificate. In addition, for all HGU boundaries that are far from being monitored, the company made a trench as a boundary. Based on this, it can be concluded that the company has properly maintained the boundaries of 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; 2.2.2; 2.2.3

The company has a list of contractors included in the stakeholder register that including contractor to transport hazardous waste, CPO/PK transporter, FFB transporter and etc. The list of stakeholders informs the name of the agency, contact name, address and contact number. The company has shown examples of agreement with contractors including FFB supplier that have contained clauses regarding legal compliance obligations, such as agreement No. 002/ADD-SSS/IV/2022 dated 1 January 2022 and agreement No. 035/SPK-TBS/SSS-ISP/VIII/2020 dated 1 August 2020. In the agreements have been explained about:

- No employing children under the age of 18, no forced labour, no human trafficking.
- Provision of sufficient PPE
- Obedience to the law
- Comply with social insurance payment obligations
- And others.

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

CV Bahri with a total of 8 workers:

- Agreement between contractor and worker with initial MJ No. 003/SPK/I/2019 dated January 2, 2019.
- Proof of payment of net wages for contractor workers with initial MJ on June 2022 which already above the district minimum wage
- BPJS Employment Card 7302030107770002
- Dump truck operator license No. 160328-OPK3-LT/PAA/XII/2019 valid until December 2, 2024.
- Proof of payment for BPJS Health for July paid on July 4, 2022 with transaction ID 202207040855756031
- Proof of payment of BPJS employment for July paid on July 15, 2022 with transaction ID 202207151201878575
- Example of giving PPE for contractor worker on July 1, 2022

The company also shows a contractor evaluation document for January 2022 that informs the name of the contractor, the name of the worker, the number of workers, administrative completeness such as BPJS Employment and Health and others.

Status: Comply

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

2.3.1

The Certification Unit can show a list of suppliers who send FFB to Lada POM. The following is FFB supplier data from outside the scope of certification for the 2022 period, among others:

Supplier Name	Member	Supplier Address	RSPO Status	Coordinate
Lada Cooperative	Internal	Rangit Jaya Village	Non-Certified	N 02° 35' 36.95"

				E 111° 45' 28.91"
Arut Cooperative	Internal	Arut Village	Non-Certified	N 02° 30' 40.44"
				E 111° 42' 26.86"
Kumai Cooperative	Internal	Kumai Village	Non-Certified	N 02° 20' 22.64"
				E 111° 41' 53.08"
Runtu Cooperative	Internal	Runtu Village	Non-Certified	N 02° 37' 28.19"
				E 111° 50' 55.03"
Tani Bahagia Cooperative	External	Pangkalan Satu Village	Non-Certified	N 02° 38' 53.51"
				E 111° 45' 35.85"
Karya Tunggal Jaya Cooperative	External	Pangkalan Dewa Village	Non-Certified	N 02° 29' 13.54"
				E 111° 49' 23.67"
CV Inti Sawit Perkasa	External	Rangit Jaya Village	Non-Certified	N 02° 28' 26.54"
				E 111° 46' 07.05"

Based on the data above, it is known that the FFB suppliers to Lada POM come from the Plantation Group and Middleman FFB suppliers outside. The delivery method for outside FFB is not based on individuals but goes through the middleman supplier FFB channel who represents individuals (in this case as an ex-Plasma cooperative). The contract made is between the company and the middleman. The management unit can show the Traceability Declaration Document – Traceability to Plantation. Document created by Middleman supplier FFB. The types of data contained in the document include Smallholder ID, owner name, legal rights, village location, sub-district, provincial district, geolocation, year of planting, ISPO & RSPO certification status, area, and average number of FFB shipments.

2.3.2

The company can show data from all indirect FFB suppliers in collaboration with Middleman FFB Suppliers equipped with evidence that the indirect FFB suppliers already have legality on the managed land, for example the Tani Bahagia Cooperative has 832 members and the Karya Tunggal Jaya Cooperative has 603 members. The two cooperatives are ex-Plasma which are now independent with land conditions that are in one stretch. Meanwhile, CV Inti Sawit Perkasa (CV ISP) only has one member, I am Mr. Iswanto. Based on this, the company only shows the coordinates for 3 locations, where the location of the Cooperative is represented by the coordinates of the cooperative's office, while for CV ISPs it is represented by the coordinates of the land. The following is the coordinate data, among others:

Supplier Name	Code	Supplier Address	RSPO Status	Coordinate
Tani Bahagia Cooperative (832 members)	KTB	Pangkalan Satu Village	Non-Certified	N 02° 38' 53.51"
				E 111° 45' 35.85"
Karya Tunggal Jaya Cooperative (603 members)	KTJ	Pangkalan Dewa Village	Non-Certified	N 02° 29' 13.54"
				E 111° 49' 23.67"
CV Inti Sawit Perkasa (1 member)	ISP	Rangit Jaya Villave	Non-Certified	N 02° 28' 26.54"
				E 111° 46' 07.05"

The company can also show proof of legal documents owned by all member farmers in the form of certificates of land rights they have (Certificate of Ownership) with an average area of 2 hectares per person, as well as information on the location of their land which is not in the disputed area or state land and forest area under protection status. Based on the results of the interview with Middleman, he also stated that all of the FFB they received could be verified as legal, because all farmers who were members were farmers who came from Plasma land and already had land rights. The resource persons also ensured that they did not accept FFB with unclear sources, such as stolen FFB and/or unregistered FFB.

The results of the comparison of the number of FFB supplier middleman members with FFB sent for the period August 2021 - July 2022, for example for the Tani Bahagia Cooperative with a total member of 832 farmers can send FFB with a total of 10,298.41 Tons of FFB/year. Based on these data, it can be calculated that the average annual production of farmers is 12 tons of FFB/year, this value is still considered rational for farmers' production. Based on this, the company can prove that it has obtained FFB from legal and documented sources.

Status: Comply

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

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

3.1.1

The certification unit has shown a long-term plan (5 year plan) for the period 2022 – 2027 that has been ratified in December 2021. The long-term plan explains FFB production, OER, KER, CPO production, Kernel production, CPO prices, PK prices CPO prices, revenue and replanting program. In addition, the certification unit can show proof of tax payments such as PPH, PBB, and PPN taxes and can show public accountant reports conducted by Purwanto, Sungkoro & Surja public accounting firm, with the report's opinion presenting fairly, in all material respects, the financial position of PT Surya Sawit Sejati as of 31 December 2021, as well as its financial performance and cash flow for the year ended on that date, in accordance with Indonesian Financial Accounting Standards.

Annual planning also evaluated at the end of year and compared with realization. Its annual planning can be adjusted based on field condition, financial condition or another reason. Estates and mill management unit stated that those long-term plan mentioned above are subjected to be changed and reviewed annually by the respective management through considering actual trends and dynamic situation which predicted could be changed in the future. Department of Sustainability together with Estate and Mill Management has responsibility to ensure that all technical implementation has in accordance with procedure, which aims to reach optimum output for budget fulfillment purposes through monitoring, training and socialization.

3.1.2

Based on the document review and the results of interviews with management, it can be concluded that no replanting activities for the Lada Estate or Runtu Estate Plantation Units will be carried out in the next 5 years based on the long-term plan document.

3.1.3

The company can show a Management Review document for each plantation and mill unit which can be detailed as follows:

- Results from public accountants stating that the company's financial condition is in good condition
- Warehouse and Inventory Condition which states that the inventory is stored in a closed warehouse and the condition is quite clean
- The condition of each plantation unit is in good condition and there are no non-conformities that need to be verified further.

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

For continuous improvement evaluation and monitoring, unit of certification has conducting internal and external audit, as well as periodic performance report by unit management. The action plan for continuous improvement is implemented based on consideration of the main social and environment impact, for example as shows through several documents, as follows:

- Internal audit RSPO is conducted by internal auditors. The audit resulted there are totalling 31 no5-conformity which 31 non-conformity has been closed and 4 Non-conformity still in process.
- Management review conducted on 18 January 2022 which informed unit performance.

3.2.2

Certification Unit already has an annual report document using the RSPO metric template format that has been 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	: United Plantations Berhad
RSPO Membership Number	: 1-0004-04-000-00
Name of Certified Unit	: Lada Palm Oil Mill
Name of Certification Body	: Mutu Certification International
RSPO PalmTrace ID Number	: CB96606
Number of Mills	: 1
Number of Estates	: 2
Production Area (ha) - Estate	: 4,011
Certified Area (ha) - Estate	: 6,718

High Conservation Value (HCV) Area (ha)	: 0
Additional set aside river buffer (ha) that are not part of the above HCV areas.	: 2,588
Peatlands - Planted (ha)	: 784
Peatlands - Unplanted (ha)	: 0
Freshwater Usage per PO produced tonne	: 2,20
Average LTIFR	: 0,00
Total Workers	: 87
% of Local Workers of Total Workers	: 100%
% of Non-Local Workers of Total Workers	: 0%
% of Contract Workers of Total Workers	: 0%
% of Female Workers of Total Workers	: 11.5%
% of Young Workers	: 0%

Based on the results of the verification of the data listed in the matrix template and compared with all the data from the verification of documents such as area statements, basic info, list of workers, water use and so on, it is concluded that the data included in the matrix template is in accordance with the data source.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

Standard Operating Procedure (SOP) related to oil palm cultivation and processing activities is systematically documented and collected. The company has specialized staff from the EHS Department responsible for document control, so that it can ensure that each management unit (plantation and factory) stores the same version of the SOP. SOPs are available in Indonesian and English. Regarding technical cultivation, SOPs are socialized through training and direction in every morning apple.

In addition, related to the technical procedures for the processing of oil palm, from receipt of FFB to dispatch, refer to the Lada Engineering Department SOP document dated 22 and 24 May 2010 which was approved by the General Manager and Mill Manager. Based on the SOP, it is known that the procedure has covered every operational activity of the plantation and mill.

Based on field visits and interviews with fertilizers in Lada Estate, it is known that workers have understood procedures related to fertilization activities such as not conducting fertilization near water bodies and how to sow fertilizer on the edge of the dish.

3.3.2

The company has a master list of all SOPs that have been classified according to work fields such as Estate, Finance, United Plantations Research Department, Biodiversity, Human Resources, Legal, and Mill. The document control officer who is part of the EHS Department has the responsibility to monitor if there are SOP updates and ensure the latest version is available in the unit.

Internal supervision is carried out in stages starting from the foreman, the assistant afdeling, to the estate chief. Field inspections are carried out every day by these three elements to ensure the implementation of the established procedures. In addition, there is a regular review every 3 months by the chief executive director and once a year by the director of the United Plantations Research Department.

3.3.3

The company has an internal system of corporate supervision that aims to monitor operational implementation in accordance with the SOPs owned, among others, by conducting RSPO internal audits every year, conducting internal audits of plantations and factories including checking aspects of implementation procedures / SOPs and administration. Internal plantations such as field visits to plantations and factories carried out by company leaders (General Manager, Manager, Staff and Foreman).

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****Environmental Impact Assessment**

- **Lada POM and Lada Estate.** *Dokumen Analisis Dampak Lingkungan* (ANDAL) for PT Surya Sawit Sejati's Palm Oil Plantation and Processing Mill activities located in Sungai Rangit Jaya Village, Lada Mandala Jaya and Pangkalan Durin, Pangkalan Lada District, Kotawaringin Barat Regency through the Decree of the Kotawaringin Barat Regent No. 660/580/Bpdl-II.2/XII/2007 concerning Environmental Feasibility of Plantation and Palm Oil Processing Factory Development PT Surya Sawit Sejati was stipulated on December 1, 2007 with an area of 6,650 ha, factory capacity of 60 tons of FFB/hour
- **Runtu Estate.** *Dokumen Analisis Dampak Lingkungan* (ANDAL) for PT Surya Sawit Sejati for Oil Palm Estate activity in Villages of Rangda, Sulung Kenambui, Runtu, and Sumpang, subdistrict of Arut Selatan, Kotawaringin Barat, Kalimantan Tengah Province. Approved by Regional AMDAL assessing board of Kotawaringin Barat Regency No. 656/359/Bpdl-II.2/VII/2007 with total area 9.000 ha through the approval from government of Kotawaringin Barat Regency, Regional Environmental Impact Controlling Agency No. 660/359/Bpdl-II.2/VII/2007 dated July, 27 2007.
- **Biogas Installation** Environmental Permit for Biogas Installation of PT Surya Sawit Sejati in Sungai Rangit Jaya Village, Pangkalan Lada District, Kotawaringin Barat Regency through the Decree of the Kotawaringin Barat Regent No. 660/15/BLH/XII/2012 dated December 12, 2012

All operational area and activity has been covered in environmental impact assessment document.

Social Impact Assessment

PT. Surya Sawit Sejati using Indonesian SEIA to gathering information regarding to monitoring and manage social cases. That document has approved by Environmental Agency of Kotawaringin Barat District since December 1st 2007. Social aspect that should monitoring during the operational activity as written in environmental management plan/environmental monitoring plan (RKL/RPL) such as:

- Working and striving opportunities.
- Community restless.
- Community income.
- Public health quality.

Whole aspect above was monitored at Sungai Rangit Jaya, Lada Mandala Jaya and Pangkalan Durin Village every semester during recruitment and operational activities. Based on interview with management and document verification all issued has been covered in environmental impact assessment document.

3.4.2**Environmental Impact Assessment**

Unit of certification has a management and monitoring plan stated in RKL RPL document involving relevant stakeholder, done periodically every semester, for example the latest monitoring held in semester I 2022.

From field observation in Lada POM, Lada Estate and Runtu Estate found that the unit of certification already managed the environment impact in line with the plan, such as:

- Air emission: boiler and boiler maintenance
- Water pollution: WWTP installation
- Noise level: maintenance machine and using PPE.
- etc.

Social Impact Assessment

Social management is written in environmental monitoring plan document (RKL/RPL) document involving relevant stakeholder and villager, done periodically every semester, for example the latest monitoring held in semester I 2022. Evaluation of trends, critical points and compliance has been including in the implementation report. From field observation in Lada POM, Lada Estate dan Runtu Estate found that the unit of certification already managed the social impact in line with the plan, such as:

- Public health: health services and vaccine related Covid-19
- Job and business opportunities
- etc

3.4.3

Environmental Impact Assessment

The company has documents, the implementation of the results of the environmental permit including reports to agencies in the form of RKL-RPL documents which are conducted every semester and reported to related agency (explain in indicator 3.4.2). The effectiveness of environmental management and monitoring can be seen from the results of environmental management and monitoring analysis, involving related stakeholder and villagers in semester I 2022., which can also be seen from the suitability between the management and monitoring plans and their implementation in the field, The RKL-RPL document also shows that the company has managed all the critical impacts recommended in Environmental permits. Include impact analysis by trend evaluation, critical level evaluation and compliance evaluation. The monitoring result of environment impact known that there wasn't any non-conformance found from the environmental and waste monitoring result for mentioned periods.

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

Social Impact Assessment

The company has managed and monitored social impacts in accordance with what has been stated in the RKL-RPL semester I 2022. In general, social impact management activities have been carried out with the aim of reducing the identified negative impacts, involving related stakeholder and villagers.

From the explanation above, it can be concluded that the unit of certification has comprehensive Social and Environmental Impact Assessment (SEIA), managed and monitored through RKL RPL document doing periodically by management.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1 & 3.5.2

The company has Human Resources System as follows:

• **Recruitment Procedure**

It is regulated in the SOP for Employee Recruitment No. SOP-HRD-01-R00 dated December 3, 2021, revision 2, which was approved by the President Director. The procedure explains that employees who have passed the selection will undergo a probationary period of 3 months.

• **Employee assessment**

Regulated in the SOP for Employee Assessment No. SOP-HRD-08-R00. In the procedure there is a flow chart that explains the flow of employee assessment. The procedure also explains that employee appraisal is carried out at least once a year. The items assessed are:

- Quality of work
- Quantity of work
- Knowledge of the task
- Responsibility
- Work initiatives
- Communication
- And others.

• **Training procedures**

Regulated in SOP No. SOP-HRD-017-R00. The stages of the training procedure are as follows:

- Analysis of training needs
- Proposed training needs
- Analysis of proposed training needs
- Internal/external training
- Evaluation

The company also has a Collective Labor Agreement which also explains the human resource system, such as:

- New Worker Acceptance
- Probational period
- Appointment of permanent workers
- Assessment of work performance
- Promotion
- Termination of employment due to retirement
- Termination of Employment due to serious mistakes
- And others.

The company has kept a track record of employees. For employee recruitment, the stages for recruitment are job application letters, CV, copies of identity cards, and supporting documents such as certificates, diplomas, transcripts and others. The company shows employee track record documents stored in each unit (factory and estate).

The company has shown a record of the implementation of employment procedures that maintained regularly, for example: Promotion

- Decree No. 036/SSS/HRD-Prom/VI/2022 dated June 21, 2022 regarding the promotion from boiler operator became boiler staff. The company has shown the results of the assessment / performance with the results of being able to be promoted to boiler staff.
- Decree No. 002/SSS/HRD-Prom/II/2022 dated February 18, 2022 regarding the promotion from harvesting worker became harvesting supervisor (foreman). The company has shown the results of the assessment / performance with the results of being able to be promoted to harvesting supervisor (foreman).

Recruitment and assessment for the appointment of permanent worker:

- Letter of Labour Agreement (trial period) No. 003/SKKB/SSS/PKS/Umm/III/2022 dated March 14, 2022 with the position of General Worker. The agreement has explained the rights and obligations of workers with a probationary period until June 14, 2022. Also attached are documentation such as job application letters, results of assessments and interviews, results of health checks and others so it is recommended to become employees on probation. The employees based on the results of the assessment have been appointed as permanent employees according to Decree No. 006/SK-Pers/SSS/ED/VI/2022 dated June 10, 2022. The company policy has also been conveyed to employees by attaching an addendum to the work agreement that informs all company policies.
- Work Agreement probation period No. 008/SKKB/SSS/PKS/Umm/VI/2022 dated 11 June 2022 with trial period until 12 December 2022. Recruitment documentation has also been shown such as job application, ID card, the results of the employee's health examination etc.

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

Status: Comply

3.6

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

3.6.1

Risk Assessment

The certification unit has hazard identification documents, assesses, and manages risks for all mill and estate operational activities, for example buffalo harvesting, manual harvesting, manuring, pesticide mixing, warehouses, sorting and grading stations, boiler stations, WTP, WWTP, etc. The document is updated if there is a work accident or deemed necessary in accordance with the results of the OHS performance evaluation. For example, the HIRAC update dated June 29, 2022 due to a work accident falling into the trench. The results of the evaluation state that safety signs and warnings need to be installed and the construction of HIRAC works near the trenches.

Occupational Health and Safety Program

The OHS work program for 2021 & 2022 includes inspections, training, periodic health checks, socialization, to routine meetings. The management unit has carried out a Special Health Checkup for Workers Lada POM, Lada Estate & Runtu Estate which was carried out in December 2021. Meanwhile, periodic health checks for all employees are planned for August 2022 (Runtu Estate), September 2022 (Lada Estate) and October 2022 (Lada POM).

The management unit has the opportunity to ensure that the Periodic Health Examination for all workers is carried out according to the predetermined plan and ensures that the periodic Health examination is carried out periodically.

Documentation of OHS Implementation

As the information contained in the offer for the implementation of MCU for PT Surya Sawit Sejati employees, the types of health checks carried out include routine hematology, cholinesterase, audiometry, and thorax. The implementation of medical examinations for the 2021 period itself is as follows 19 December 2021: 84 employees of Lada POM, 85 employees of Lada Estate, 33 employees of Runtu Estate

OHS inspection

Includes inspection of PPE completeness, Fire Extinguisher examination, first aid kit including first aid bag. There are daily, weekly, and monthly inspections. The responsible officer is the OHS Committee secretary

OHS training and socialization

The management unit can show documentation of the implementation of the OHS Policy Dissemination, OHS Procedures and OHS Program either to workers or to contractors. Some of the realizations that have been made include:

- SOP & HIRAC Meeting Training for activities at the Clarification station on February 23, 2022 which was attended by 20 Workers.
- Training on fire emergency response simulation (Fire Dril) on 27 July 2022 which was conducted in the workshop area attended by 41 workers.
- Socialization and Briefing with POM and Plantation Contractors related to OHS on 24 May 2022 which was attended by 22 Participants.

3.6.2

The company shows that OHS monitoring includes periodic inspection of emergency response facilities and infrastructure (fire extinguisher, hydrant, first aid), inspection and testing of OHS equipment and machinery, as well as the realization of health checks. The company shows records of general health checks to all workers (Estate and Mill) conducted in December 2021. Health checks include weight, height, and nutritional status. Based on the results of the document review, it is known that the results of the examination are all negative for PAK, in good physical condition, and ready to carry out activities with several recommendations including: Maintain a Healthy Lifestyle, Increase Consumption of Nutritious Food and Always Use PPE when working. Thus, it can be concluded that the company has carried out monitoring of the effectiveness of the OHS plan to handle OHS risks in people.

Status: Comply

3.7

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

3.7.1, 3.7.2.

The company showed the Training Program for each unit in 2021/2022 that cover all aspects of the P&C RSPO. The training also covers parties who need training such as staff, workers and contractors. As for sustainability team and HR department are responsible for the development of the training program scheduling and implementation of training. The 2021/2022 training programs such as:

- Harvesting & pruning training
- Spraying & IPM training
- Manuring training
- Deliver & loading training
- Fire drill training
- SOP training of Heavy equipment
- Welder certification training
- SOP training of chemical spill emergency response

- SOP Training of empty bunch press
- SOP training of Final effluent
- And others.

As for the training program for farmers is related to plantation maintenance and harvesting training.

Records of Fire drill training on June 30, 2022 held at Lada POM attended by 36 participants (stakeholders and workers), such as:

- Records of first aid training on 22 July 2022 for 35 workers (estate and mill).
- Record of harvesting SOP training and harvesting HIRAC socialization on November 16, 2021 to 23 participants
- Records of SOP manuring training on December 13, 2021 for 15 participants
- Record of fire prevention SOP training and socialization of HIRAC on 21 May 2022 to 7 participants
- Record of fire prevention SOP training and HIRAC socialization on 10 July 2021 to 9 participants
- Records of Harvesting training on June 25, 2022 for 8 participants
- Records of SOP training for chemical spill emergency response on 20 May 2022 for 17 workers
- Records of Digester & press SOP training on June 14, 2022 for 16 participants
- Records of SOP spraying training and socialization of HIRAC spraying on June 2, 2022 to 10 workers

The results of interviews with representatives of labor union and workers such as warehouse officer, harvesters, spraying workers, grading officer, and boiler officer stated that the company had provided training or socialization regarding work procedures for each worker in *Bahasa* and understood by the workers. In addition, the results of interviews with boiler officers, also conveyed that the worker has been given in boiler officer training. As for the training program which involve contractors such as SOP socialization and training related to OHS. From the results of interviews with workers and contractors, known that workers and contractors can explain the training that has been obtained such as work procedures and OHS implementation. It can be proved that all workers and contractors were using PPE and can explained the hazard of their work activity. The results of interviews with representatives of FFB suppliers revealed that the company has also provided socialization regarding harvesting mechanisms that meet the criteria.

3.7.3

The unit of certification showed socialization about the supply chain to employees which was last conduct on 28 January 2022. The minutes explained the procedures for managing certified and non-certified products including the responsibilities for each of the personnel who handle products. Based on the interviews with weighbridge officers and security, the two personnel 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; 3.8.2; 3.8.3

Lada Palm Oil Mill applied SCCS Module MB since its received and processing the FFB from certified and uncertified sources. The mill claims only the volume of oil palm products produced from certified FFB as MB.

3.8.4

Estimated certified product recorded in the last Assessment Report and Certificate and has been updated in the RSPO Palm Trace. Actual certified produced has been verified during this assessment, and not exceed the estimate. The estimates of certified production for the next license period also have been set, in reasonable amount considering the last year's production. The data presented in the following table:

	Last Year Projected Certified Volume (MT)	Actual production in last year (MT)	Estimation for the next 12 months
FFB Processed	254,720	233,693.84	100,000
CPO Production	59,050	50,650.67	21,000
Palm Kernel (PK) Production	11,946	10,524.48	4,500

3.8.5

Lada Mill has been registered in IT platform Palmtrace RSPO <https://palmtrace.rspo.org/web/rspo/member-directory> which

information as follows:

- Member name: PT Surya Sawit Sejati (Lada Palm Oil Mill)
- License Period (27 February 2020 – 26 August 2022) 30 months
- Account UID: RSPO_AC100004019
- Core product: Palm Oil
- Member ID: RSPO_PO1000004083
- Member category: Oil Mill
- GPS Coordinates: 111.772559, -2.590899
- Visiting address:
 - Street: Ds. Pangkalan Durin, Kecamatan Pangkalan Lada.
 - City: Kotawaringin Barat
 - State: Kalimantan Tengah
 - Country: Indonesia

All transactions also have been registered on RSPO IT Platform, including CSPK volume sold as physical as amount as 6,300 ton. The company does not conduct transactions for CSPO, both physically and on credit. All CSPO stock is sold under Conventional.

The auditors verify related to transactions on the Palmtrace platform with actual sales of certified products, for example:

- In May 2022 where there was a sale of 150,000 kg of CSPK to PT Wilmar Nabati Indonesia – Gresik KCP
- In June 2022, where there was a sale of 300,000 kg of CSPK to PT Wilmar Nabati Indonesia – Gresik KCP
- All the transaction was in accordance with the transactions made at RSPO Palmtrace.

3.8.6

Lada mill has had supply chain procedure through the document Module E – CPO Mills: Mass Balance that approved and signed by President Director of PT. Surya Sawit Sejati 4th Revision on 2 January 2022. This procedure described the rules as follows:

- Definition of Module E – Mass Balance
- Objective
- Standard
- Planning:
 - Separation of certified and noncertified product.
 - Demarcation of field which certified (HGU) or noncertified (Non HGU) by yellow paint.
 - Harvesting process, loading and transporting FFB (from certified or noncertified field) the certified stamp (Certified Sustainable FFB – MUTU-RSPO/123). If the majority of FFB is noncertified at one field, they will be downgrade as non-certified.
 - FFB receiving in mill (if the certified and non-certified FFB send on the one truck, the mass balance will be percentage by the bunch's, all FFB consignment from third parties will be stamp as Uncertified FFB.
 - FFB processing in mill.
 - Sales and dispatch
 - Record keeping (the mill will be recording all FFB received, CPO & PK dispatch regarding to real time basis).
 - Continuous improvement.

3.8.7

Procedure to conduct internal audit for SCCS implementation has been defined by the mill, namely SOP of Internal Audit, which mentioned that internal audit shall be conducted annually to implement and maintain the respective standard requirements effectively, and including the SCCS standard in key station involved (purchasing FFB, processing, sales storage, delivery and shipping of certified product). The latest internal audit was carried out in 20 January – 5 February 2022 and based result of internal audit there is no non conformity related the requirements of SCCS.

3.8.8

The mill has a record amount of FFB tonnage as follows:

Month	FFB (MT)		Total
	RSPO Certified	Non-Certified	

Feb-20	6,910.13	15,061.80	21,971.93
Mar-20	6,710.34	14,531.91	21,242.25
Apr-20	7,850.94	14,735.69	22,586.63
May-20	8,191.89	13,756.63	21,948.52
Jun-20	9,001.33	15,500.15	24,501.48
Jul-20	7,966.60	13,869.13	21,835.73
Aug-20	7,508.45	14,276.72	21,785.17
Sep-20	8,927.49	14,959.70	23,887.19
Oct-20	7,514.48	14,950.25	22,464.73
Nov-20	7,041.37	12,520.27	19,561.64
Des-20	8,462.39	14,211.88	22,674.27
Jan-21	7,827.44	14,376.00	22,203.43
Feb-21	6,670.60	13,639.33	20,309.93
Mar-21	9,053.39	17,066.30	26,119.69
Apr-21	8,610.40	15,675.99	24,286.39
May-21	7,490.50	14,200.13	21,690.63
Jun-21	8,920.08	15,720.60	24,640.68
Jul-21	8,049.58	14,726.03	22,775.61
Aug-21	7,318.48	13,843.07	21,161.55
Sep-21	5,842.15	11,396.55	17,238.70
Oct-21	5,191.74	9,586.06	14,777.80
Nov-21	5,194.06	11,931.30	17,125.36
Des-21	6,540.09	13,608.53	20,148.62
Jan-22	8,215.06	14,980.16	23,195.21
Feb-22	7,323.92	13,227.96	20,551.88
Mar-22	8,986.50	16,017.97	25,004.47
Apr-22	8,657.11	14,551.43	23,208.54
Mei-22	7,785.97	13,764.27	21,550.24
Jun-22	8,525.04	17,046.74	25,571.78
Jul-22	8,061.29	14,638.66	22,699.95
Total	230,348.78	428,371.22	658,720.00

The auditor has verified FFB received records over the last 30 months, the total FFB certified received was 658,720.00MT.

3.8.9

The company shows documentation of certified products, such as sales contracts, shipping announcements, delivery orders, etc. These documents explain the name and contact person of the buyer and seller, date of delivery, product description, quality, quantity, member ID, and others. The transaction also including RSPO certificate number (MB MUTU-RSPO/123). Based on the data, there is no over sales of certified products or any non-certified products that are claimed to be certified products. The sales documentation such as:

- Seller: PT Surya Sawit Sejati – Lada POM.
- Member ID: RSPO_PO10000083.
- Buyer: PT Wilmar Nabati Indonesia – Gresik KCP.
- Seller contract number: W-PK.08/06.22.
- Seller reference number: 021/PK/ED-PT.SSS/VI/2022.
- Product: CSPK.
- Volume: 300 MT.
- Transaction ID TR-91eadf4b-281b.

Based on document review and interview with management representative, there's no CSPO sold as certified product.

3.8.10

During the last 30 months, Mill has not sold CPO which is claimed by the RSPO. As for RSPO PK sales, the company does not use contractors to transport PK. Based on the agreement with the buyer, the transportation of the carriage is the responsibility of the buyer.

3.8.11

During the last 30 months, Mill has not sold CPO which is claimed by the RSPO. As for RSPO PK sales, the company does not use contractors to transport PK. Based on the agreement with the buyer, the transportation of the carriage is the responsibility of the buyer.

3.8.12

The Mill does not purchase RSPO certified oil palm products from outsider. The RSPO product from the Mill were from FFB of its own certified Estates. Lada POM has record of all CSPO and CSPK information, as well as presented in the table belows:

Crude Palm Oil

Period	CPO Production (MT)		Total	CPO Delivery (MT)			Stock
	Certified	Uncertified		Certified (Physical)	Other Scheme	Conventional	
Stock Opening							3,490.12
Feb-20	1,589.87	3,465.40	5,055.28	-	-	4,605.89	3,939.51
Mar-20	1,505.13	3,259.52	4,764.65	-	-	5,895.49	2,808.67
Apr-20	1,704.85	3,199.90	4,904.76	-	-	5,604.51	2,108.91
May-20	1,777.27	2,984.57	4,761.84	-	-	5,276.82	1,593.93
Jun-20	1,985.45	3,418.91	5,404.36	-	-	5,223.18	1,775.11
Jul-20	1,692.42	2,946.35	4,638.77	-	-	5,064.68	1,349.20
Aug-20	1,619.98	3,080.27	4,700.25	-	-	4,935.32	1,114.13
Sep-20	1,966.13	3,294.63	5,260.76	-	-	4,000.00	2,374.89
Oct-20	1,623.30	3,229.59	4,852.89	-	-	5,000.00	2,227.78
Nov-20	1,536.53	2,732.12	4,268.65	-	-	4,241.51	2,254.92
Des-20	1,861.70	3,126.58	4,988.28	-	-	5,758.49	1,484.71
Jan-21	1,671.13	3,069.23	4,740.37	-	-	4,216.32	2,008.75
Feb-21	1,480.32	3,026.81	4,507.13	-	-	4,610.92	1,904.97
Mar-21	2,007.24	3,783.80	5,791.05	-	-	4,044.33	3,651.68
Apr-21	1,899.02	3,457.34	5,356.36	-	-	6,780.37	2,227.67
May-21	1,649.27	3,126.61	4,775.88	-	-	3,755.88	3,247.67
Jun-21	1,956.68	3,448.41	5,405.09	-	-	4,644.39	4,008.37
Jul-21	1,756.79	3,213.91	4,970.70	-	-	7,388.55	1,590.52
Aug-21	1,591.22	3,009.82	4,601.04	-	-	5,458.90	732.66
Sep-21	1,259.18	2,456.35	3,715.54	-	-	4,300.00	148.19
Oct-21	1,136.46	2,098.36	3,234.82	-	-	2,648.06	734.95
Nov-21	1,133.48	2,603.72	3,737.21	-	-	4,451.22	20.93
Des-21	1,395.19	2,903.08	4,298.27	-	-	3,884.81	434.39
Jan-22	1,762.77	3,214.41	4,977.19	-	-	4,615.91	795.66
Feb-22	1,573.39	2,841.75	4,415.13	-	-	3,337.43	1,873.37
Mar-22	1,904.02	3,393.82	5,297.84	-	-	4,912.57	2,258.64
Apr-22	1,829.31	3,074.82	4,904.12	-	-	4,500.12	2,662.64
Mei-22	1,599.79	2,828.16	4,427.95	-	-	3,566.72	3,523.87
Jun-22	1,758.48	3,516.28	5,274.76	-	-	5,237.00	3,561.63
Jul-22	1,656.88	3,008.76	4,665.63	-	-	2,981.84	5,245.43
Total	49,883.28	92,813.26	142,696.54	-	-	140,941.23	

Based on record verification, there's no CSPO sold as certified product on license period.

Palm Kernel

Period	PK Production (MT)		Total	PK Delivery (MT)			Stock
	Certified	Uncertified		Certified (Physical)	Other Scheme	Conventional	
Stock Opening							442
Feb-20	327.43	713.69	1,041.13	-	-	1,320.00	163.13
Mar-20	312.69	677.17	989.86	-	-	600.00	552.99
Apr-20	350.09	657.10	1,007.20	-	-	1,100.58	459.61

May-20	371.16	623.29	994.45	-	-	999.42	454.64
Jun-20	415.85	716.08	1,131.93	-	-	1,200.00	386.57
Jul-20	363.81	633.36	997.17	-	-	1,200.00	183.74
Aug-20	329.80	627.10	956.90	-	-	900.00	240.64
Sep-20	407.65	683.09	1,090.73	-	-	900.00	431.37
Oct-20	331.55	659.62	991.17	-	-	900.00	522.54
Nov-20	299.01	531.67	830.68	300.00	-	600.00	453.22
Des-20	359.36	603.52	962.88	300.00	-	900.00	216.10
Jan-21	342.52	629.08	971.60	300.00	-	452.91	434.79
Feb-21	291.51	596.05	887.57	300.00	-	747.09	275.27
Mar-21	382.30	720.67	1,102.97	300.00	-	600.00	478.24
Apr-21	359.41	654.34	1,013.75	300.00	-	693.55	498.44
May-21	328.58	622.90	951.47	300.00	-	756.86	393.05
Jun-21	391.50	689.98	1,081.49	300.00	-	774.39	400.15
Jul-21	338.41	619.10	957.51	300.00	-	667.31	390.35
Aug-21	313.12	592.28	905.40	300.00	-	807.89	187.86
Sep-21	261.35	509.83	771.18	300.00	-	370.33	288.71
Oct-21	238.01	439.46	677.47	300.00	-	525.19	140.99
Nov-21	241.30	554.30	795.60	300.00	-	304.48	332.11
Des-21	306.98	638.75	945.73	300.00	-	600.00	377.84
Jan-22	375.46	684.65	1,060.11	300.00	-	600.00	537.95
Feb-22	331.26	598.31	929.57	300.00	-	600.00	567.52
Mar-22	401.63	715.88	1,117.51	300.00	-	900.00	485.03
Apr-22	401.72	675.24	1,076.97	287.33	-	900.00	374.67
Mei-22	365.38	645.93	1,011.30	312.67	-	300.00	773.30
Jun-22	407.21	814.25	1,221.46	300.00	-	1,200.00	494.76
Jul-22	379.87	689.81	1,069.68	300.00	-	643.27	621.17
Total	10,325.94	19,216.50	29,542.44	6,300.00	-	23,063.27	

There's CSPK sold as certified product as amount as 6.300 MT for 30-month period.

3.8.13

Lada POM has determined the extraction rate for CPO and PK to be produced. Based on actual production of CPO and PK for last 30-month period. The Extraction rate for production projections will be update annually based on the actual production of CPO and PK and company procedure.

3.8.14

Lada POM has determined the extraction rate for CPO and PK to be produced. Based on actual production of CPO and PK for last 30-month period. The Extraction rate for production projections will be update annually based on the actual production of CPO and PK and company procedure.

3.8.15

Lada POM applies the Mass Balance supply chain model, because mill receives fruit from certified and uncertified sources. Sources of certified FFB come from Lada Estate and Runtu Estate (Certificate No. MUTU-RSPO/123). While the source of uncertified FFB comes from the Non-Certified Area of Lada Estate, Non-Certified Runtu Estate, Arut Estate, Kumai Estate, smallholders & Third Parties.

3.8.16

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

- Member Name: PT Surya Sawit Sejati (Lada Palm Oil Mill)
- Membership No.: 1-0004-04-000-00
- Member ID: RSPO_PO1000004083
- License ID: CB96606

Whole transaction of CSPO/CSPK has been declared in RSPO IT Platform. Related to CSPK transaction, auditee informs that there's CSPK sold as physical as amount as 6.300 ton.

From shipping announcement verification, known that shipping announcement carried out not more than 3 months after dispatch. For example, Shipping announcement of CSPK as much as 300 MT, with shipping date from 13-14 June 2022 and confirmation date on 17 June 2022.

3.8.17

Based on announcement and transaction report documents review, it concluded that all RSPO certified products submitted are in compliance with the RSPO Rules on Market Communications and Claims. Based on management representative interview and document review, the mill not use trademark on its sales activities and communication.

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

The company has a human rights policy that was established on July 23, 2018, which was set by the President Director. The policy explains that PT Surya Sawit Sejati is committed to protecting and prioritizing human rights wherever it operates. The human rights policy is based on our core values of monitoring safety and health, the environment and respect for the individual.

The company has also shown documentation of socialization of company policies including human rights policies, such as:

- Recording of gender and human rights socialization on 10 June 2022 to 9 workers
- Recording of gender and human rights socialization on 12 July 2022 to 12 workers, etc.

Based on interview with stakeholder such as government agency, community around, representatives of labor union, and workers known that there is no indication of human rights violation.

4.1.2

The results of interviews with stakeholders such as government agencies, representatives of surrounding villages, labor union, representatives of the gender committee and the results of field observations, it is known that there is no use of mercenaries or paramilitaries in the company. From the results of the interview, it was also informed that there were no issues related to human rights violations in the company.

Status: Comply

4.2

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

4.2.1

The company has the following procedures:

- Violation Reporting Mechanism No. SOP SSS-EST-30 dated December 23, 2017. The stages of reporting include:
 - Reports can be submitted via phone number, email, and messages.
 - The officer will record the report and submit it to management
 - The company will verify the report
 - If the results of the investigation into the report prove to be true, the company will take the necessary action.
 - If the complainant feels that the company has not provided a solution to the report, the complainant can submit this to the RSPO Complaint System
- SOP for Internal and External Complaints No. SOP-HRD-07-R00 dated December 14, 2020. In the procedure, it is explained that:
 - Settlement of employee complaints is resolved within 30 working days of the complaint. If it is not resolved within 30 working days, a bipartite process will be carried out which will be carried out within 10 working days. And if it has not been resolved, it will be handled according to the applicable law and labor law (tripartite process).

- Complaints from external parties are resolved within 30 working days of the complaint

The company also has a Whistleblower Policy dated July 23, 2018 which explains that the company protects independent and confidential reporting of violations.

The results of interviews with workers and labor union known that workers understand the grievance mechanism. Complaints can also be submitted to labor union. From the results of the interview, it was stated that workers' complaints were usually related to complaints about housing improvements and had been followed up by the company.

The results of interviews with contractors and village representatives indicated that the village and contractors had understood the grievance mechanism. From the results of the interview, it was found that there were no complaints from external parties.

4.2.2

The company has internal and external complaints procedures with No. SOP-HRD-07-R00 dated December 14, 2020. The procedure describes communication and consultation. The face-to-face communication/consultation is carried out to explain the intent and process related to plantation/mill operations to stakeholders, especially for illiterate stakeholders.

4.2.3

The company has a complaint log book in the Complaints Record. From document verification, it is known that all employee complaints have been responded by company. For example:

- Complaint dated April 8, 2021 regarding the complaint of housing damage and has been repaired on April 13, 2021
- Complaints dated May 5, 2022 regarding complaints of damaged ambulances and have been followed up on May 5, 2022.
- Complaint dated 31 May 2022 related to housing complaint and has been repaired on 5 June 2022

As for external complaints, based on document verification, it is known that no complaints have been received by the company.

In addition, the results of interviews with representatives of labor unions obtained information that the workers' complaints have been responded to by the company and there are no complaints that have not been resolved. As for the results of interviews with surrounding villages, contractors and related agencies, it is known that there were no complaints to the company.

4.2.4

The company has SOP for Internal and External Complaints No. SOP-HRD-07-R00. In the procedure, it is explained that:

- Complaints from external parties are resolved within 30 working days of the complaint
- Actions taken are recorded and communicated to outsiders. For prolonged cases, the parties will always be provided with progress information every month
- The result of the settlement will be documented and the outside party will be officially informed by the company
- If there is a result that does not satisfy the parties, it will be resolved legally
- Complainants are free to appoint independent legal and technical advice and choose individuals or groups to support them and/or act as observers as well as the choice of a third-party mediator

The results of interviews with contractors and village representatives indicated that the village and contractors had understood the grievance mechanism. From the results of the interview, it was found that there were no complaints from external parties.

Status: Comply

4.3

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

4.3.1

The company has a program to improve the welfare of the surrounding community in the COMDEV/CSR Program Plan for the 2022 period. The document informs the name of the activity, category, target, number of participants, activity objectives, and budget. The types of activities planned consist of strengthening regional territories, empowering local communities, education, health, socio-cultural, religious, and environmental activities.

The CSR program is prepared based on the participation of the surrounding community. The company shows the minutes of public consultations and FGDs in several villages, for example:

- Public consultations and FGDs in Runtu Village and Rangit Jaya Village on 16-17 February 2022 which were attended by 40 village officials and community members to submit CSR requests.
- Meeting with the Madurejo village community on September 15, 2021 which was attended by 4 village officials and community representatives to submit requests for assistance.
- Meeting with Sungai Rasau Hamlet on 23 May 2022 regarding socialization and efforts to protect Orangutans, which was accompanied by conveying the aspirations of the community to receive assistance.
- Etc.

In addition, the company can also show a long-term plan in providing CSR which is contained in the Strategic Plan for Community Social Management of PT Surya Sawit Sejati CSR Program. The activities planned in the long term 2018-2022 include:

- **Education:** in the form of scholarships for elementary and high school students in villages around the company, procurement of teaching-learning support books for PAUD and TK, as well as training for teaching staff (PAUD, TK).
- **Health:** free medical services for local communities, family planning programs and *posyandu*.
- **Infrastructure:** regular village road repair program, construction of bridges and culverts. This activity can also be incidental according to the request of the community.
- **Socio-cultural:** Ramadhan safari program as well as conveying company assistance for houses of worship, donations for national/religious holidays, assistance for village head training, assistance for cattle for traditional events in Benaning Hamlet, as well as ATK assistance for agencies around the company.
- **Business opportunities:** the company also establishes cooperation in the form of business opportunities with stakeholders. For example, for school children's pick-up activities, transportation of FFB/CPO and the management of the company canteen.
- **Employment opportunities:** the company provides opportunities for the local community to work and do business. Job opportunities in the form of job vacancies are open and informed to the public. Based on records from the HR Department, currently there are 317 workers working in the company, both in the plantation and factory units.
- **Plasma plantation development:** has been carried out in stages since the beginning of plantation development and involves the surrounding community.

Regarding the program, the company has carried out CSR activities in 2022, here are some examples of CSR activities that have been carried out, including:

- **Education:** Scholarship assistance for Rangit Jaya Village and Kenambui Village on 20 July 2022
- **Health:** Child Health Care conducted at the Lada Estate Clinic for the period January - July 2022, the activity was carried out to provide assistance to the surrounding community in health checks and child treatment assistance (*Posyandu*), as well as providing Vitamins, Curcuma, and Prevention of hepatitis in children elementary schools located around the company area.
- **Infrastructure:** Assistance for road repairs in Rangit Jaya Village, Pangkalan Durin Village, Medang Sari Village, Runtu Village, Bumi Harjo Village, Sumber Agung Village and Lada Mandala Jaya Village in January - July 2022.
- **Social and cultural:** Lighting and sports area facilities assistance in January and July 2022.

The company can show a report on the implementation of the CSR program for the semester 1 of 2022 which explains CSR activities consisting of infrastructure, religion, community empowerment, education, sports, social culture, health & environment, partnerships, and others. In addition, the company also reports the development of CSR through the Plantation Business Development Report, for example the LPUP for the period of 2021 which is submitted to the Plantation Office of Kalimantan Tengah Province on January 8, 2022. The company has also evaluated the CSR program in 2021. Based on the evaluation results, it is known that there are some programs were not implemented due to the Covid 19 pandemic, for example for activities that involved many people such as breaking the fast together, coaching and training for village communities. The rest, CSR programs can be implemented and will be continued in 2022.

Based on interviews with the Village Heads of Runtu and Rangit Jaya Villages, it is known that the company has provided CSR assistance to the village community regularly every year such as education assistance, road repairs, disaster assistance and assistance for religious events. The company has also provided other assistance to the village, such as road repair assistance, scholarships, providing empty fruit trees for fertilizer, and others. In addition, the results of interviews with the staff of the Kotawaringin Barat Regency Plantation Service also revealed that the company's CSR activities are also reported in the Plantation Business Development Report (LPUP) every semester.

Status: Comply

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

4.4.1

The company can show several documents showing legal ownership or lease, or customary land use permits granted by customary land owners (*ulayat*) through a FPIC process. There are also documents related to the history of land ownership and actual legal or customary use which are listed in the following documents:

LOCATION PERMISSION

PT Surya Sawit Sejati has obtained a location permit for its operational needs (oil palm cultivation and processing) since 2006 and has undergone several revisions and extensions with the following series of changes:

Lada Estate

- Kotawaringin Barat Regent Decree No. 89.480.42/BPN/II/2005 dated February 5, 2005 concerning the Granting of Location Permits for PT Surya Sawit Sejati Oil Palm Plantation in Sungai Rangit Jaya and Lada Mandala Jaya Villages, Pangkalan Lada District, Kotawaringin Barat Regency, covering an area of 2,650 Ha. Map attachment with a scale of 1: 100,000.
- Kotawaringin Barat Regent Decree No. 242.480.42/BPN/III/2006 dated March 31, 2006 regarding the Granting of Location Permits for PT Surya Sawit Sejati Oil Palm Plantation in Sungai Rangit Jaya and Lada Mandala Jaya Villages, Pangkalan Lada District, Kotawaringin Barat Regency, covering an area of 1,500 Ha. Map attachment with a scale of 1: 100,000. The decision was then revised in 2007 through the Decree of the Kotawaringin Barat Regent No. 266.480.42/BPN/V/2007 dated 11 May 2007 concerning Revision of Location Permits related to map attachments to previous Location Permits. For a fixed scope of 1,500 Ha. Map attachment with a scale of 1: 75,000.
- Kotawaringin Barat Regent Decree No. 644.480.42/BPN/IX/2006 dated 27 September 2006 concerning the Granting of Location Permits for PT Surya Sawit Sejati Oil Palm Plantation in the Mandala Jaya Lada Village Area, Pangkalan Lada District, Kotawaringin Barat Regency, covering an area of 2,500 Ha. Attachment map scale with 1: 60,000. The decision was then revised in 2007 through the Decree of the Kotawaringin Barat Regent No. 267.480.42/BPN/V/2007 dated 11 May 2007 concerning Revision of Location Permits related to map attachments to previous Location Permits. For a fixed scope of 2,500 Ha. Map attachment with a scale of 1: 75,000.
- Kotawaringin Barat Regent Decree No. 525/820/VIII/2010 dated August 2, 2010 concerning the Extension of Location Permit for PT Surya Sawit Sejati Oil Palm Plantation in the Mandala Jaya Lada Village Area, Pangkalan Lada District, Kotawaringin Barat Regency, covering an area of $\pm 4,000$ Ha. The permit is an Extension of the Location Permit as well as consolidating the Revised Location Permit that was previously granted with No. 262.480.42/BPN/V/2007 covering an area of 1,500 hectares located in Sungai Rangit Jaya and Lada Mandala Jaya villages, as well as the Revised Location Permit No. 267.480.42/BPN/V/2007 covering an area of 2,500 hectares located in the village of Lada Mandala Jaya. Map attachment with a scale of 1: 75,000.
- Kotawaringin Barat Regent Decree No. 525/27/S.Kop/Pem-Tan/XII/2015 dated December 21, 2015 concerning the Granting of Location Permits to Expand the Development of Conservation Land for PT Surya Sawit Sejati in the Pangkalan Durin Village Area, Pangkalan Lada District, Kotawaringin Barat Regency, covering an area of $\pm 28,46$ Ha. Map attachment with a scale of 1: 100,000.

Runtu Estate

- Kotawaringin Barat Regent Decree No. 664.480.42/BPN/X/2006 dated October 5, 2006 regarding the Granting of Location Permits for PT Surya Sawit Sejati Oil Palm Plantation in Runtu and Umpang Villages, Pangkalan Lada District, Kotawaringin Barat Regency, covering an area of 9,000 Ha. Map attachment with a scale of 1: 100,000. The decision was then revised in 2007 through the Decree of the Kotawaringin Barat Regent No. 268.480.42/BPN/V/2007 dated 11 May 2007 concerning Revision of Location Permits related to map attachments to previous Location Permits. For a fixed scope of 9,000 Ha. Map attachment with a scale of 1: 125,000.
- Kotawaringin Barat Regent Decree No. 525/821/VIII/2010 dated August 2, 2010 concerning Extension of Location Permit for PT Surya Sawit Sejati Oil Palm Plantation in Runtu Village and Umpang Village, Arut Selatan Subdistrict, Kotawaringin Barat Regency, Area 9,000 Ha. The permit is an extension of the Location Permit to PT Surya Sawit Sejati as well as consolidating the Revised Location Permit that was previously granted with No. 262.480.42/BPN/V/2007 covering an area of 9,000 hectares located in Runtu Village and Umpang Village. Map attachment with a scale of 1: 75,000.

Based on the above documents, Lada Estate currently has three valid Location Permits, namely Location Permit No.

89.480.42/BPN/III/2005 covering an area of 2,650 Ha, Location Permit No. 525/820/VIII/2010 covering an area of $\pm 4,000$ Ha, and Location Permit No. 525/27/S.Kop/Pem-Tan/XII/2015 covering an area of ± 28.46 Ha. Thus, the total Location Permit for Lada Estate is $\pm 6,678.46$ Ha. Meanwhile, Runtu Estate currently has one valid Location Permit, namely Location Permit No. 525/821/VIII/2010 covering an area of 9,000 Ha. Based on this, it can be concluded that the two Estates that are included in the scope of certification, all have a Location Permit covering an area of $\pm 15,678.46$ Ha.

All of these documents have stated that the company's area is in the Plantation Designated Area (KPP) and the Other Designated Use Area (KPPL). This is also in accordance with the results of the integration between the HGU area and the RUTRW map of Kalimantan Tengah Province which refers to Regional Regulation no. 8 of 2003. This is also in accordance with the Decree of the Head of the Forestry and Plantation Planning Agency No. 778/VIII-KP/2000 dated September 12, 2000 which states that areas with KPP and KPPL status no longer require the process of releasing forest areas.

Prior to 2012, from a total area of $\pm 15,678.46$ Ha of Location Permits, the company only obtained a HGU of 2,508,472 Ha which refers to Location Permit No. 89.480.42/BPN/III/2005 dated February 5, 2005. However, in 2012 the Ministry of Forestry issued a Decree of the Minister of Forestry No. 529 of 2012 which describes the Amendment to the Decree of the Minister of Agriculture Number 759/KPTS/UM/10/1982 concerning the Designation of Forest Areas in the Province of Kalimantan Tengah covering an area of $\pm 15,300,000$ Ha as Forest Areas, of which the Location Permit covers an area of $\pm 15,678.46$ Ha, there are areas that are included in Convertible Production Forests (HPK) and Permanent Production Forests (HPT). Related to this, the company re-identified the Forest Areas included in their management area, and obtained the results that from the HGU area No. 42 covering an area of 2,508,472 Ha, part of which is included in the HPK area of $\pm 1,769$ Ha (in the application for release) and APL covering an area of 739.47 Ha. Therefore, the company is obliged to apply for the release of the HGU area with the HPK status.

Up to the time this audit assessment was conducted, the process of releasing the forest area contained in HGU No. 42 has not yet been completed. The following are the details of the process for managing the release of Forest Areas that have been carried out by the company, including:

- The company has initiated to apply for the release of forest areas that can be proven based on Letter No. 002/J/VI/09 dated June 5, 2009 regarding the Application for Release of Forest Areas on HGU No. 42 which was sent to the Minister of Forestry of the Republic of Indonesia.
- After several management processes, until 2021 the company has not yet received a decision regarding the release of forest areas. On September 30, 2021, the company again sent a letter of application for the release of the HPK area through letter No. 148/L/PB/IX/2021 which was sent to the Minister of Environment and Forestry, Republic of Indonesia.
- On April 25, 2022, the company again sent a response to the letter sent in 2021 regarding the Progress of the Forest Area Release Process with letter No. 145/L/PB/IV/2022.
- On July 15, 2022, the company again sent a response to the letter sent on April 25, 2022 regarding the Appointment of the Integrated Team for the Release of HPK Areas for an area of $\pm 1,769$ Ha through letter No. 246/L/PB/VII/2022.

However, for another area of 6,004.15 Ha, the forest area has been released and has obtained a HGU in 2018 which can be shown through the HGU acquisition document No. 1/HGU/KEM-ATR/BPN/2018 regarding the Granting of Cultivation Rights on behalf of PT Surya Sawit Sejati on land in Kotawaringin Barat Regency, Kalimantan Tengah Province, covering an area of 6,004.15 Ha. The document explains that based on the minutes of the Kalimantan Tengah Province B land inspection committee dated December 2, 2016 No: 08/RPPTB/HGU/XII/2016 jo. Additional Minutes of the Land Inspection Committee B dated December 14, 2016 Number 08/RPPTB/HGU/XII/2016, stated:

- The land requested is state land consisting of an area of 5,122.73 Ha originating from the Release of Forest Areas in accordance with the Decree of the Head of the Investment Coordinating Board on behalf of the Minister of Environment and Forestry of the Republic of Indonesia dated March 20, 2015 Number 1/1/PKH/PMA/ 2015 concerning the Release of Production Forest Areas that can be converted for Palm Oil plantations on behalf of PT Surya Sawit Sejati in Kotawaringin Barat Regency, Kalimantan Tengah Province, as well as a land area of 1,055.62 Ha which is an Other Use Area, on which there is community cultivation that has been replaced loss by PT Surya Sawit Sejati. So that the total area proposed to become HGU is 6,178.35 Ha.
- The land requested for in accordance with the results of the overlay with the Regional Spatial Planning Map of Kalimantan Tengah Province (Perda Number 8 of 2003), is located in the Production Development Area (KPP) and Settlement and Other Use Areas (KPPL).
- The land requested is based on the map attached to the Decree of the Minister of Environment and Forestry of the Republic

of Indonesia dated November 20, 2015 Number 5385/MenLHK-PKTL/IPSDH/2015 concerning Stipulation of Indicative Map of Suspension of New Permits for Forest Utilization, Use of Forest Areas and Changes in Designation of Forest Areas and Use Areas Others, all of which are outside the area of peatlands and Primary Natural Forests.

There is a difference between the proposed area and the HGU area obtained because there are several areas that are public facilities issued, so that the total HGU obtained by the company in 2018 is 6,004.15 Ha. Based on this, the company has made efforts to release the Forest Area but has not been able to complete the process. However, all areas included in the scope of certification are free from overlapping HPK and HPT areas. Thus, according to the document, it can be stated that the area of the company that is included in the scope of certification is in accordance with its designation. Based on the results of interviews with staff from the National Land Agency Office and staff from the Kotawaringin Barat Regency Agriculture Office, it is known that until now there have been no additional new areas related to the location permits that have been held.

HGU and HGB

The company has obtained legal land rights in the form of HGU and HGB from the government with details as follows:

HGU Decree

- Decree of the National Land Agency Number: 81/HGU/BPN/2005 dated July 4, 2005, location of Desa Lada Mandala Jaya and Sungai Rangit Jaya, expiry date of rights September 24, 2040. Letter of Measurement Number 1 dated April 8, 2005 with an area of 2,508,472 Ha. Issuance of certificates by the Head of the Land Office of Kotawaringin Barat Regency, dated August 9, 2005. However, referring to the Letter from the Directorate General of Forestry Planning, Ministry of Forestry No. S.6/VII-KUH/2014 dated January 6, 2014 regarding the order for the demarcation of the release of forest areas for plantation cultivation on behalf of PT Surya Sawit in Kotawaringin Barat Regency, Kalimantan Tengah Province. This letter, among other things, explains that the results of the review are based on the location permit, the map attached to Perda No. 8 of 2003 and the Decree of the Minister of Forestry No. SK.529/Menhut-II/2012 it is known that of the 2,508,472 Ha that have obtained the HGU, only + 738.1 Ha has APL status. Furthermore, the remaining area of +1,769.9 Ha is in the process of obtaining HGU.
- Decree of the Minister of State for Agrarian and Spatial Planning/Head of the National Land Agency Number 1/HGU/KEM-ATR/BPN/2018 concerning the Granting of Cultivation Rights on behalf of PT Surya Sawit Sejati on Land in Kotawaringin Barat Regency, Kalimantan Tengah Province. Based on the decision of the first point, it was stated that "to grant PT Surya Sawit Sejati domiciled in Pangkalan Bun, Kotawaringin Barat Regency, the Right to Cultivate for Oil Palm plantations for 35 (thirty five) years from the date of this decision, over a total of 6,004 State Lands. 15 ha is located in Sungai Rangit Jaya Village, Pangkalan Durin, Sungai Melawen, Lada Mandala Jaya, Pangkalan Dewa and Pandu Sanjaya, Pangkalan Lada District, as well as Runtu, Kenambui and Umpang Villages, Arut Selatan District, Kotawaringin Barat Regency, Kalimantan Tengah Province.

HGU Certificate (Total 6.742.25 Ha)

Lada Estate

- Cultivation Right Certificate No. 42, Based on the Decree of the National Land Agency Number: 81/HGU/BPN/2005 dated July 4, 2005, the location of Lada Mandala Jaya and Sungai Rangit Jaya Village, the expiry date of the rights is September 24, 2040. Letter of Measurement Number 1 dated April 8, 2005, Area 2,508,472 Ha. Issuance of Certificate by the Head of the Land Office of Kotawaringin Barat Regency, August 9, 2005.
- Note: based on the Decree of the Minister of Forestry No. SK.529/Menhut-II/2012 of the total area recognized is +738.1 Ha with APL status.
- HGU Certificate No. 00059 dated March 12, 2018 on a land area of 328.40 Ha with the expiry date of the rights until January 1, 2053. This certificate refers to the Decree of the Minister of ATR/BPN No. 1/HGU/KEM-ATR/BPN/2018 dated January 2, 2018 for the area of land parcel No. 15.06.00.00.00082.
- HGU Certificate No. 00061 dated March 12, 2018 for a land area of 222.90 Ha with the expiry date of the rights until January 1, 2053. This certificate refers to the Decree of the Minister of ATR/BPN No. 1/HGU/KEM-ATR/BPN/2018 dated January 2, 2018 for the area of land parcel No. 15.06.00.00.00077.
- HGU Certificate No. 00062 dated March 12, 2018 on a land area of 480.10 Ha with the expiry date of the rights until January 1, 2053. This certificate refers to the Decree of the Minister of ATR/BPN No. 1/HGU/KEM-ATR/BPN/2018 dated January 2, 2018 for the area of land parcel No. 15.06.00.00.00078.
- HGU Certificate No. 00063 dated March 12, 2018 on a land area of 464 Ha with the expiry date of the rights until January 1, 2053. This certificate refers to the Decree of the Minister of ATR/BPN No. 1/HGU/KEM-ATR/BPN/2018 dated January 2, 2018 for the area of land parcel No. 15.06.00.00.00079.

- HGU Certificate No. 00064 dated March 12, 2018 on a land area of 588.80 Ha with the expiry date of the rights until January 1, 2053. This certificate refers to the Decree of the Minister of ATR/BPN No. 1/HGU/KEM-ATR/BPN/2018 dated January 2, 2018 for the area of land parcel No. 15.06.00.00.00080.
- HGU Certificate No. 00065 dated March 12, 2018 on a land area of 678.40 Ha with the expiry date of the rights until January 1, 2053. This certificate refers to the Decree of the Minister of ATR/BPN No. 1/HGU/KEM-ATR/BPN/2018 dated January 2, 2018 for the area of land parcel No. 15.06.00.00.00081.
- HGU Certificate No. 00066 dated March 12, 2018 on a land area of 103.60 Ha with the expiry date of the rights until January 1, 2053. This certificate refers to the Decree of the Minister of ATR/BPN No. 1/HGU/KEM-ATR/BPN/2018 dated January 2, 2018 for the area of land parcel No. 15.06.00.00.00083.
- HGU Certificate No. 00067 dated March 12, 2018 for a land area of 261.70 Ha with the expiry date of the rights until January 1, 2053. This certificate refers to the Decree of the Minister of ATR/BPN No. 1/HGU/KEM-ATR/BPN/2018 dated January 2, 2018 for the area of land parcel No. 15.06.00.00.00084.
- HGU Certificate No. 00072 dated March 12, 2018 for a land area of 90.42 Ha with the expiry date of the rights until January 1, 2053. This certificate refers to the Decree of the Minister of ATR/BPN No. 1/HGU/KEM-ATR/BPN/2018 dated January 2, 2018 for the area of land parcel No. 15.06.00.00.00076.
- HGU Certificate No. 00073 dated March 12, 2018 for a land area of 22.01 Ha with the expiry date of the rights until January 1, 2053. This certificate refers to the Decree of the Minister of ATR/BPN No. 1/HGU/KEM-ATR/BPN/2018 dated January 2, 2018 for the area of land parcel No. 15,06,000,00092.
- HGU Certificate No. 00074 dated March 12, 2018 for a land area of 10.62 Ha with the expiry date of the rights until January 1, 2053. This certificate refers to the Decree of the Minister of ATR/BPN No. 1/HGU/KEM-ATR/BPN/2018 dated January 2, 2018 for the area of land parcel No. 15.06.00.00.00091.

Runtu Estate

- HGU Certificate No. 00058 dated March 12, 2018 for a land area of 358.10 Ha with the expiry date of the rights until January 1, 2053. This certificate refers to the Decree of the Minister of ATR/BPN No. 1/HGU/KEM-ATR/BPN/2018 dated January 2, 2018 for the area of land parcel No. 15.06.00.00.00089.
- HGU Certificate No. 00060 dated March 12, 2018 on a land area of 103.30 Ha with the expiry date of the rights until January 1, 2053. This certificate refers to the Decree of the Minister of ATR/BPN No. 1/HGU/KEM-ATR/BPN/2018 dated January 2, 2018 for the area of land parcel No. 15,06,000,000,0090.
- HGU Certificate No. 00068 dated March 12, 2018 on a land area of 111.10 Ha with the expiry date of the rights until January 1, 2053. This certificate refers to the Decree of the Minister of ATR/BPN No. 1/HGU/KEM-ATR/BPN/2018 dated January 2, 2018 for the area of land parcel No. 15.06.00.00.00085.
- HGU Certificate No. 00069 dated March 12, 2018 on a land area of 983.10 Ha with the expiry date of the rights until January 1, 2053. This certificate refers to the Decree of the Minister of ATR/BPN No. 1/HGU/KEM-ATR/BPN/2018 dated January 2, 2018 for the area of land parcel No. 15,06,000,00086.
- HGU Certificate No. 00070 dated March 12, 2018 for a land area of 359.80 Ha with the expiry date of the rights until January 1, 2053. This certificate refers to the Decree of the Minister of ATR/BPN No. 1/HGU/KEM-ATR/BPN/2018 dated January 2, 2018 for the area of land parcel No. 15.06.00.00.00087.
- HGU Certificate No. 00071 dated March 12, 2018 for a land area of 837.80 Ha with the expiry date of the rights until January 1, 2053. This certificate refers to the Decree of the Minister of ATR/BPN No. 1/HGU/KEM-ATR/BPN/2018 dated January 2, 2018 for the area of land parcel No. 15.06.00.00.00088.

HGB Certificate (Total 1,651 Ha):**Lada Estate**

- HGB Certificate No. 00002 dated July 11, 2016 on a land area of 1,651 Ha located in the Village/Kelurahan: Pangkalan Durin with the expiry date of the rights until September 24, 2046. This certificate refers to the Decree of the Head of the Land Office of Kotawaringin Barat Regency No. 01/HGB/BPN/62.01.2016 dated 30 June 2016 for the area of land parcel No. D.I 301 No. 5330.

Based on all the documents above, information is obtained that PT Surya Sawit Sejati already has the legality of the land in the form of a HGU Certificate with a total area of 8,512.62 Ha and a HGB Certificate with an area of 1,651 Ha with a total management area of 15,508.47 Ha. The results of interviews and analysis of the HGU map show that the HGB area is on the edge of the HGU area which currently has housing and lodging built. However, because there is an area of $\pm 1,769$ Ha (in the application for release) that is included in the HPK, so for HGU that is free from overlapping with HPK it is 6,742.25 Ha. So that the company's current

HGU + HGB area is 6,743.90 Ha. In the company's HGU there is also an area of 24.63 hectares with the current condition being managed by the community with a partnership pattern. Based on this, the area included in the scope of certification is 6,717.62 hectares. Regarding this matter and the results of interviews with management, information was obtained that the company has plans to change the scope of the HGU in accordance with the results of the Exchange of Forest Areas and Release of HPK Areas in the future. The results of interviews with the National Land Agency and the Department of Agriculture of Kotawaringin Barat Regency, obtained information that until the time the audit was conducted, no new areas were added.

When referring to the total scope of corporate management, which is 15,508.47 Ha, while for the newly acquired HGU which is 8,512.62 Ha and HGB covering an area of 1,651 Ha, then there are still managed areas that do not have the legality of HGU and HGB covering an area of 4,872 Ha. because the current condition is still included in the Production Forest Area. The company is in the process of managing the Forest Area Swap (TMKH) as evidenced by the following documents:

- Document Number S.770/Menlhk/Setjen/PLA.2/10/2 dated October 7, 2019 regarding the acquisition of a Principal Permit to Exchange Forest Areas covering an area of ±4,793 Ha with a replacement candidate in the form of Convertible Production Forest covering an area of ±6,030 Ha.
- Document Number S.13/1/KLHK/2021 dated February 9, 2021 regarding the extension of the Principal Permit for the Exchange of Forest Areas covering an area of ±4,793 Ha.
- Document Number SK/239/MENLHK/SETJEN/PLA.2/5/2021 dated 19 May 2021 regarding the approval of the release of permanent production forest areas for the development of oil palm plantations covering an area of ±4,793 Ha and replacement land covering an area of ±6,030 Ha.
- Document Number 062/L/PB/II/2022 dated February 10, 2022 related to the application for determination of PSDH-DR.
- Document Number 091/L/PB/III/2022 dated March 14, 2022 regarding the application for a Clear and Clean letter of land in lieu of a request for area release which was sent to the Forestry Service of Kalimantan Tengah Province
- Document Number 522/1049/II.1/Dishut dated April 1, 2022 regarding Clear and Clean recommendations from the Forestry Service of Kalimantan Tengah Province
- Document Number 115a/L/PB/IV/2022 stairs; April 4, 2022 related to the application for the determination of the work area for the release of forest areas for the development of oil palm plantations.
- Deed of Commitment Statement No. 111 dated 18 July 2022 related to the Deed of Commitment Statement regarding the Exchange of Forest Areas made by PT. SSS.

The following are the details of the identification of the status of the area in the company's current operational area, including:

Information	Lada Estate	Runtu Estate	Total
Scope of corporate governance	6508.47	9000.00	15508.47
Location Permit No. 89.480.42/BPN/II/2005	2650.00	0.00	2650.00
Location Permit No. 525/820/VIII/2010	4000.00	0.00	4000.00
Location Permit No. 525/27/S.Kop/Pem-Tan/XII/2015	28.46	0.00	28.46
Location Permit No. 664.480.42/BPN/X/2006	0.00	9000.00	9000.00
Total Location Permits	6678.46	9000.00	15678.46
Location Permits entered into HPK	1769.90	0.00	1769.90
Location Permits entered into HPT	0.00	4872	4872.00
Location Permission entered into the APP	4908.56	4128	9036.56
Total	6678.46	9000.00	15678.46
Location Permit that has HGU	5759.42	2753.2	8512.62
HGU Number 42	2508.47	0.00	2508.47
HGU Number 58 - 74	3250.95	2753.2	6004.15
Location Permit that has the Right to Use	28.46	0.00	28.46
Location Permits that do not have HGU	749.05	6246.80	6995.85
Abandoned area	141.53	0.00	141.53
Total	6678.46	9000.00	15678.46
Areas with HGU that are included in the HPK	1769.90	0.00	1769.90
HGU areas outside of HPK	3989.52	2753.20	6742.72
HGU Number 42	738.57	0.00	738.57
HGU Number 58 - 74	3250.95	2753.20	6004.15
Total area with HGU	5759.42	2753.20	8512.62

The company also has legal documents regarding the form of legal entity owned by the company, including:

- Deed of Establishment of Limited Liability Company PT Surya Sawit Sejati No. 19 dated December 6, 2004 by Eko Soemarno, SH (Notary and Land Deed Maker Officer). Ratification of the Deed of Establishment of the Limited Liability Company by the Minister of Law and Human Rights of the Republic of Indonesia Number: C-11413 HT.01.01 TH 2005, April 27, 2005.
- Letter of Approval for Change of Status of Non-Domestic Investment Company/Foreign Investment Non PMDN/PMA) to Foreign Investment Company (PMA) by the Investment Coordinating Board, Number: 6/V/PMA/2007 dated January 8, 2007.
- Decree of the Investment Coordinating Board, Number: 1122/T/PERTANIAN/2008 dated November 10, 2008 regarding the Permanent Business Permit (IUT) of PT Surya Sawit Sejati.
- Deed of Decision of the Shareholders of PT Surya Sawit Sejati Number 27 dated 11 November 2008 regarding the Amendment to the Articles of Association of the Limited Liability Company of PT Surya Sawit Sejati. Deed of Amendment to the Company's Articles of Association, drawn up by Robert Purba (Notary and Land Deed Maker Officer). The deed has been approved by the Minister of Law and Human Rights of the Republic of Indonesia Number: AHU-94483.AH.01.02. year 2008.
- Deed of Statement of Meeting Resolutions of PT Surya Sawit Sejati Number 130 dated June 26, 2013 made by Hasbullah Abdul Rasyid, SH, M.Kn (Notary and Land Deed Making Officer) regarding Changes in Organizational Structure. The deed was approved by the Minister of Law and Human Rights of the Republic of Indonesia Number: AHU-.AH.01.10-47376 dated November 8, 2013.
- Deed of Statement of Meeting Resolutions of PT Surya Sawit Sejati Number 86 dated 11 May 2018 made by Hasbullah Abdul Rasyid, SH, M.Kn (Notary and Land Deed Making Officer) regarding Changes in the Board of Directors and Commissioners. The deed has been approved by the Minister of Law and Human Rights of the Republic of Indonesia Number AHU-0067193.AH.01.11 of 2018 dated May 14, 2018) in accordance with the letter of Plt. Director General of General Legal Administration number AHU-AH.01.03-0192120 dated May 14, 2018.
- Deed of Statement of Meeting Resolutions of PT Surya Sawit Sejati Number 222 dated 30 June 2022 made by Jimmy TanaL, SH, M.Kn (Notary and Land Deed Making Officer) regarding the Amendment to the Articles of Association. The deed has been approved by the Minister of Law and Human Rights of the Republic of Indonesia Number AHU-009814.AH.01.02 of 2022 dated July 18, 2022.

Based on all the documents above, it can be concluded that PT Surya Sawit Sejati is a company that already has land legality and a legal entity.

4.4.2

In accordance with the applicable laws and regulations, the location permit holder is obliged to liberate the rights of others who are in his location permit. The results of interviews with management revealed that PT Surya Sawit Sejati is a company that was taken over by United Plantations Berhad. During the management transfer process, not all land compensation documents were submitted to the new management. However, there are several documents that show that the compensation process has been carried out by previous management. Related to this, the company can show some documentary evidence of land compensation, as follows:

- Compensation for Land Map No. 15 which is located in Umpang Village for 12 residents with a total area of 103.87 Ha worth Rp. 104,000,000. The compensation was completed simultaneously on 2 – 3 December 2006 accompanied by a statement of land transfer, a statement of land tenure, rough drawings of the land, photocopies of KTP/KK and payment receipts. For example, compensation for residents on behalf of Gusti Hamsi, Gusti Batri, Hj. Shratana, Marianah, Gusti Harun, Aliman, Hamsar, M. Idehan, Kadirun, Utin Elen, Akhmad Elkendri and Jailani.
- Compensation for Land Map No. 14 which is located in Runtu Village for 8 residents with a total area of 113 Ha worth Rp. 125,000,000. The compensation was completed simultaneously on June 14, 2007 accompanied by a statement of land surrender, a statement of land tenure, rough drawings of the land, photocopies of ID cards/KK and payment receipts. For example, compensation for residents on behalf of Anuar, Arbain, Rumsiti, Gusti Rani, Marhan, Syamsuri Udang, Mislianti and Mawi.
- Compensation related to the results of the land dispute settlement process with the Melawen Village Community on behalf of Bakran Sidik et al for a land area of 615.3 Ha. The decision refers to the results of the Pangkalan Bun District Court No. 34/PDT.G/2013/PN.P.Bun dated 10 June 2014, Palangka Raya High Court Decision No. 44/PDT.G/2014/PTPLK dated November 12, 2014 and the Decision of the Supreme Court of the Republic of Indonesia No. 1061 K/Pdt.2015 dated 28 September 2015 which states that PT Surya Sawit Sejati is the legal owner of the said land.
- Compensation with the people of Mandala Jaya Village on behalf of Sutaji for a land area of 0.75 Ha to become Plasma land with the same area in Arut Estate. The swap process was completed on September 27, 2015.

- Compensation with the people of Mandala Jaya Village on behalf of Suparjo for a land area of 0.75 Ha with a compensation value of Rp. 45,000,000, - which was paid on January 23, 2017.
- Compensation with the community on behalf of Christianto Hutabarat SHM No. 1982 with an area of 0.58 Ha (Lada Estate) which was paid on April 27 2018, the complementary documents consist of: Letter of Agreement on Payment of Land Compensation and Planting No. 011/GRTT/SSS-C.HUT/IV/2018 dated 27 April 2018, Letter of Release and surrender of land rights No. 011/SSS-LD/IV/2018 dated 27 April 2018, Husband/Wife Approval Letter, and proof of payment receipt.
- Compensation with the community on behalf of Edi Kusnadi SHM No. 986 with an area of 0.75 Ha (Lada Estate) which was paid on 18 May 2018, the complementary documents consist of: Letter of Agreement on Payment of Land Compensation and Planting No. 005/GRTT/SSS-ED/V/2018 dated 17 May 2018, Statement Letter of Release and surrender of land rights No. 005/SSS-LD/V/2018 dated 17 May 2018, Husband/Wife Approval Letter, and proof of payment receipt.
- Compensation with the community on behalf of Morlen Manik covering an area of 10.22 Ha (Runtu Estate) which was paid on 15 May 2018, the complementary documents consist of: Land Exchange Letter No. 001/TG/SSS-MM/V/2018 dated 15 May 2018, Statement Letter of Release and surrender of land rights No. 001/SSS-LD/V/2018 dated 15 May 2018, Husband/Wife Approval Letter, and proof of payment receipt.
- Compensation with 23 community members represented by the chairman of the Cooperative on behalf of Machfud Afandi and Jaka Suherman covering an area of 46.13 Ha (Lada Estate) which was paid on July 21, 2021, complementary documents consisting of: Memorandum of agreement to resolve the overlapping land issue No. 036/LD/SSS-KTJ/VII/2021 dated July 21, 2021, Land Exchange Letter No. 036/TG/SSS-KTJ/VII/2021 dated 21 July 2021, Grant Statement Letter, Husband/Wife Approval Letter, and proof of payment receipt.

Based on the results of the analysis of the Minutes of Compensation and the Letter of Agreement for the Release of Land Rights, there is clear information regarding the rights and obligations of the first party, namely the company and the second party, namely the owner of the land being compensated. Also attached is the nominal price that must be compensated and signed by both parties as proof of the price agreement, proof of payment receipts that have been paid in full, as well as a map of the location of the land being compensated. Based on that then the decision for anti-loss has been agreed upon by all parties in a transparent manner and without any liability. Based on this information, the Lada and Runtu Estate areas that are included in the scope of certification are free from land tenure and there are no conflicts related to land tenure by the community. The Estate area that has not been included in the scope of certification is because it does not yet have a HGU and is still controlled by the community and the land acquisition cannot be carried out.

The results of interviews with PT SSS management, the BPN of Kotawaringin Barat Regency and representatives of the Runtu Village and Rangit Jaya Village communities also explained that for the period 2021 - 2022 there were no activities for land acquisition, land compensation or conflicts related to land claims. Based on these data and explanations, it can be concluded that the permit holder has carried out the obligation to acquire land in the Location Permit area (which is included in the scope of certification) from the rights and interests of other parties.

4.4.3; 4.4.4; 4.4.5; 4.4.6

The land used by the company is state land and community land which is compensated. PT SSS is a company whose shares are taken over by a subsidiary of United Plantations, so it does not have initial land clearing documents. The company can show a land compensation document which also explains the map of the land being compensated and involves bordering/neighbors parties. Land ownership in the company's permit area is community land which can be proven by a Certificate of Ownership (SHM) or Certificate (SKT).

Based on the results of public consultations with the Land Office and Agriculture Office of Kotawaringin Barat Regency as well as interviews with the Village Heads of Runtu and Rangit Jaya Villages, it was found that there were no cases of land disputes between the community and PT SSS in the period 2021 – 2022. The results of interviews with company management also stated that the same, namely there are no land disputes for the period 2021 – 2022, all land disputes that occur in the company area have been resolved in the period before 2018. Several land disputes that have been carried out with final decisions in the form of compensation or land acquisition have been explained in indicator 4.4.2. Based on this, it can be concluded that so far there are no land conflicts that have a significant impact on the company's operational activities.

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 land expansion activity during this audit. The land acquisition process includes through land compensation as described in indicator 4.4.2. Based on document Identification of HCV and stakeholder consultation, there was not found customary/indigenous rights in operational area. There were the records of the process of collecting information on the preparation of the High Conservation Values Identification Report and the Social Impact Assessment Report. The recording evidence comprising of participants' list and photographs.

The process of compensation for land certification units that are included in the scope of certification has been completed before 2005. The company has shown documentation of land acquisition as described in criterion 4.4. Based on the results of interviews with previous land owners from Runtu Village and Rangit Jaya Village, information was obtained that compensation had been carried out based on an agreement with the community and there was no coercion in the compensation process. In addition, the compensation process has also involved the local government.

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 management unit has demonstrated the SOP for Land Dispute Resolution No. SSS-COMDEV(HMS)-024 dated April 1, 2014 and SOP for Implementation of Land Compensation and Plant Growth No. SOP-HRD015-ROO which was approved by the President Director on January 1, 2016. The SOP contains guidelines for implementing compensation as follows:

- Conducting inventories, piloting and measuring in areas that are planned for plantation development. The inventory team consists of the GIS team, village and sub-district governments as well as community leaders who understand land ownership.
 - Conducting outreach to the community who owns the land. The materials that must be disseminated include:
 - Recognition of land in areas that have been cultivated by the village known to the village.
 - Have a certificate of ownership at least at the village or sub-district level.
 - Land area in HCS or other proof of ownership in accordance with applicable regulations.
 - The land is recommended by the estate and biodiversity as suitable land for planting.
 - For land on behalf of farmer groups, land compensation approval can be made.
- Negotiating with land owners to be land compensation.
- Management approval.
- Prepare for the implementation of the land compensation payment which includes:
 - Preparation of land compensation and land legality documents.
 - Place and time of implementation.
 - Documentation/photos, location maps, witnesses, village heads and sub-district heads.
- Make land compensation payments in accordance with the application.
- Make minutes of land compensation payment.
- Hand over land that has been land compensation to the company.
- All land compensation documents must be kept in a vault.

Based on this document, the company already has procedures related to determining agreements with related parties to identify legal rights, customary rights or usage rights, and procedures to identify people who are entitled to compensation.

4.6.2

The management unit has demonstrated the SOP for Land Dispute Resolution No. SSS-COMDEV(HMS)-024 dated April 1, 2014 and SOP for Implementation of Land Compensation and Plant Growth No. SOP-HRD015-ROO approved by the President Director on January 1, 2016 which explains the determination of agreements with related parties to identify legal rights, customary rights or usage rights, and procedures to identify people entitled to compensation.

There is no land expansion activity during this audit. The land acquisition process includes through land compensation as described

in indicator 4.4.2. Based on document Identification of HCV and stakeholder consultation, there was not found customary/indigenous rights in operational area. There were the records of the process of collecting information on the preparation of the High Conservation Values Identification Report and the Social Impact Assessment Report. The recording evidence comprises of participants' list and photographs.

The process of compensation for land certification units that are included in the scope of certification has been completed before 2005. The company has shown documentation of land acquisition as described in criterion 4.4. Based on the results of interviews with previous land owners from Runtu Village and Rangit Jaya Village, information was obtained that compensation had been carried out based on an agreement with the community and there was no coercion in the compensation process. In addition, the compensation process has also involved the local government.

4.6.3

Based on the results of document verification, it shows that all IUPs (3 IUP documents) for PT Surya Sawit Sejati plantation management were issued in 2005 and 2006 before the issuance of Minister of Agriculture Regulation 26 of 2007 and Minister of Agriculture 98 of 2013. So that the management unit concerned is not subject to the 20% obligation to develop plantations for local communities. However, PT Surya Sawit Sejati continues to develop plasma plantations for the surrounding community through several stages starting from 2010 until now. Based on the plasma development report in July 2022, it is known that currently there are 29 plasma locations (individuals & cooperatives), 3 Tanah Kas Desa locations (Runtu Village, Umpang Village, Kenambui Village) with a total of 1,371.88 Ha. The following are some examples of MoUs between PT SSS and plasma members, including:

- Deed of Notary H. Nurhadi, S.H. No. 7661/NH/L/III/2017 dated March 11, 2017 Cooperation Agreement with Pulau Bananing Sejahtera Producer Cooperative regarding Partnership in Oil Palm Plantation Development No. 027.1/MoU/SSS-Kop.PBS/III/2017 (dated March 11, 2017). Plasma plan 600 Ha (489 farmers). The updated list of CPP Plasma is 351 participants with an area of 600 Ha.
- Cooperation Agreement between PT SSS and Plasma farmers (Kel. Morlen Manik in Medang Sari Village, Arut Selatan District, Kotawaringin Barat regarding Oil Palm Plantation Partnership No. 053/MoU/SSS-MDS/V/2018 dated 31 May 2018 land as a result of swaps covering an area of 5.22 ha in Medang Sari Village; the term of the agreement is 25 years.
- Cooperation Agreement between PT SSS and Plasma farmers (Kel. Morlen Manik in Medang Sari Village, Arut Selatan District, Kotawaringin Barat regarding Oil Palm Plantation Partnership No. 054/MoU/SSS-MDS/V/2018 dated 31 May 2018 5 hectares of land as a result of swap in Medang Sari Village; the term of the agreement is 25 years.
- Cooperation Agreement between PT SSS and Plasma farmers (Sumini in Medang Sari Village, Arut Selatan District, Kotawaringin Barat regarding Oil Palm Plantation Partnership No. 001/CA/SSS-MDS/X/2017 dated October 19, 2017 SHM land area of 1 Ha in Medang Sari Village; the term of the agreement is 25 years.
- Cooperation Agreement/Agreement between PT SSS and Plasma farmer Nur Hasim in Medang Sari Village, Arut Selatan District, Kotawaringin Barat regarding Palm Oil Plantation Partnership No. 025/MoU/SSS-MDS/X/2017 dated October 19, 2017 LU-1 transmigration land area of 2 Ha in Medang Sari Village; The term of the agreement is 25 years.

In addition, based on the results of interviews with village heads and community leaders of Sungai Rangit Jaya and Runtu, information was obtained that the company already has partnerships with the community in the form of developing Village Lands (TKD), individual plasma plantations, partnerships for the transportation of FFB and so on without limiting rights of a certain gender, all people who are entitled to plasma, will have the same opportunity. According to the management staff's explanation, the company is committed to continuing to develop partnerships or plasma plantations with the community as long as the area offered by the community is in accordance with its designation. Based on the documents and information from the public consultation above, it can be concluded that the company has documented cooperation in the development of community gardens and has also been known by the local government.

4.6.4

The company can show the process and results of all agreements, compensation and payments resulting from negotiations are fully documented with evidence of the participation of affected parties and made available to these parties. The land compensation process has been described in Criterion 4.4. As for cooperation with the community in plasma development, it can be proven from several documents as follows:

- There was an MoU in 2010 with each village (7 villages), Sub Total: 164.52 Ha. For example, with Pangkalan Durin Village (16.40 Ha), MoU between PT SSS and the village community, dated 27 April 2010; Sungai Melawen Village (28.75 Ha), MoU between PT SSS and the Village community, dated 8 June 2010, Etc.

- MoU in 2014 with Medang Sari Village, sub total: 934.11 Ha. For example, with the 46 Ha Medang Sari Residents Plasma Group (I), the MoU between PT SSS and the Village community, dated January 15, 2014; Family Plasma Group of the late H. Hermansyah 75 Ha, MoU between PT SSS and the family of the deceased, April 10, 2014. Etc.
- There is also a Revenue Sharing Cooperation Agreement between PT Surya Sawit Sejati and several surrounding villages for the Village Cash Land Program (paid since January 2014) for a total of 110 Ha with the following details:
 - Runtu Village, Number: 009/SPK/SSS-TKD Rtu/II/2014 dated February 25, 2014, with an area of 50 Ha.
 - Umpang Village, Number: 011/SPK/SSS-TKD Ump/II/2014 dated February 25, 2014, with an area of 50 Ha.
 - Kenambui Village, Number: 018/SPK/SSS-TKD Knb/V/2014 dated 10 May 2014, covering an area of 10 Ha.

The company has also shown the Decree of the Regent of Kotawaringin Barat Number: 525/102/XI/2013 dated November 14, 2013 regarding the Location Permit for Oil Palm Plantation on behalf of PT Surya Sawit Sejati in the Arut Selatan sub-district, Pangkalan Lada sub-district, Pangkalan Banteng sub-district and Kumai (Area ± 3,157.29 Ha). This program is intended for the development of plasma plantations. There is also a letter from PT Surya Sawit Sejati Number: 096/L/PB/V/2014 dated 17 May 2014 to the Kotawaringin Barat Regent regarding the Application for Determination of Plasma Agreements/Production Sharing Partnerships to become Plasma Participants.

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 and 4.7.2

The management unit has demonstrated the SOP for Land Dispute Resolution No. SSS-COMDEV(HMS)-024 dated April 1, 2014 and SOP for Implementation of Land Compensation and Plant Growth No. SOP-HRD015-ROO which was approved by the President Director on January 1, 2016. The SOP contains guidelines for implementing compensation as follows:

- Conducting inventories, piloting and measuring in areas that are planned for plantation development. The inventory team consists of the GIS team, village and sub-district governments as well as community leaders who understand land ownership.
 - Conducting outreach to the community who owns the land. The materials that must be disseminated include:
 - Recognition of land in areas that have been cultivated by the village known to the village.
 - Have a certificate of ownership at least at the village or sub-district level.
 - Land area in HCS or other proof of ownership in accordance with applicable regulations.
 - The land is recommended by the estate and biodiversity as suitable land for planting.
 - For land on behalf of farmer groups, compensation approval can be made.
- Negotiating with land owners to be compensation.
- Management approval.
- Prepare for the implementation of the compensation payment which includes:
 - Preparation of compensation and land legality documents.
 - Place and time of implementation.
 - Documentation/photos, location maps, witnesses, village heads and sub-district heads.
- Make compensation payments in accordance with the application.
- Make minutes of compensation payment.
- Hand over land that has been compensation to the company.
- All compensation documents must be kept in a vault.

Based on this document, the company already has procedures related to determining agreements with related parties to identify legal rights, customary rights or usage rights, and procedures to identify people who are entitled to compensation.

4.7.3

The company can show evidence that communities who have lost access to and rights to land for plantation expansion are given the opportunity to benefit from plantation development for example by developing plasma as described in criterion 4.6. In addition, the company also supports the economic development of the community through empowering local communities by recruiting workers from surrounding villages, collaborating with local contractors and buying daily necessities from the surrounding community as evidenced by the following documents:

- Letter of Cooperation Agreement with BUMDES Karya Mandala Makmur regarding FFB loading activities, FFB transport, EFB

transport and pick-up for harvest employees. 029/SPK-SSS/II/2022 from January 1 to December 31, 2022.

- Cooperation Agreement with the FFB supplier on behalf of the Karya Tunggal Jaya Cooperative regarding the FFB Sale and Purchase Agreement No. 010/SPK/SSS-KTJ/X/2019 dated October 1, 2019.
- Cooperation Agreement with FFB Supplier on behalf of the Tani Bahagia Cooperative regarding FFB Sale and Purchase Agreement No. 009/SPK-MO/UP-SSS/IX/2019 dated 31 August 2019.
- Letter of Cooperation Agreement with local contractor on behalf of CV Rania Lestari regarding the Painting Work of employee housing No. 015/SPK/ED-PT.SSS/VI/2022 dated 16 June 2022.
- Purchase of harvesting equipment and PPE for the harvest team as evidenced by Cash payment voucher No. 432/19 July 5, 2022
- Purchase of grass clippers, equipment for buffalo, and others as evidenced by Cash payment voucher No. 429/19 July 5, 2022
- Purchase of Office Stationery for TPA as evidenced by Cash payment voucher No. 437/19 July 5, 2022.

Based on the results of interviews with the heads of Sungai Rangit Jaya and Runtu villages, information was obtained that the company has also subscribed to several traders around the company's area in meeting daily needs such as stationery, personal protective equipment, plantation equipment and so on. The results of interviews with the company stated that the community's economic improvement activities were carried out with several programs, one of which was by supporting local businesses by purchasing daily necessities from around the company's area, in order to trigger community economic growth.

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

Regarding disputes, evidence of legal land acquisition and evidence of compensation as agreed by the parties have been given to all persons who have legal rights, customary rights, or usufructuary rights at the time of land acquisition. The evidence has been described in indicator 4.4.2. Based on the HCV Identification document and stakeholder consultation, no tradition rights were found in the operational area. There is a record of the information gathering process for the preparation of the High Conservation Value Identification Report and the Social Impact Analysis Report. Recorded evidence in the form of a list of participants and photos attached to the document.

The compensation process for land titling units that fall within the scope of certification was completed before 2005. The company has shown documentation of land acquisition as described in criterion 4.4. Based on the results of interviews with previous land owners from Runtu Village and Rangit Jaya Village, information was obtained that compensation had been carried out based on an agreement with the community and there was no coercion in the compensation process. In addition, the compensation process also involves local governments.

At the time of the audit, none of the previous land owners could be contacted because the compensation process had taken a long time and many were no longer in the village (moved and died). However, the auditor was able to contact the family of one of the previous land owners and from the interview it was found that the land compensation agreement process was negotiated through the FPIC process in consultation with the affected parties and the process was carried out in an open and fair manner without any coercion according to the agreement of both parties.

4.8.2; 4.8.3; 4.8.4

There is no evidence to suggest that there is a process of acquisition through disposition or forcible taking and land conflicts in the area of the unit of certification. Based on public consultations with relevant government agencies in Kotawaringin Barat Regency and village representatives from the local village as well as interviews with the family of one of the previous land owners, it was found that all land acquisition between local communities and company representatives was carried out by mutual agreement and the compensation process was directed to the land owner. and without prejudice to legal/customary rights, land owners 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; 5.1.2**

FFB received in Mill is source from scheme smallholder and third party supplier. The determination is carried out every month by the Palm Oil FFB Purchase Determination Team by government for scheme smallholder. While for third parties are based on agreement.

The pricing was informed to all parties by message since the pandemic situation. Unit of Certification also has a mechanism for conveying prices to farmers in the form of direct information by plasma assistants who make visits to farmers every day which is submitted directly to the Cooperative Management.

5.1.3

Unit of Certification has determined a fair price that has been agreed with the supplier farmers, which is documented in the Cooperation Agreement, in the document there is a statement that the price set to determine the selling price of FFB is the price determined by the Pricing Team of the Plantation Office of Kalimantan Tengah, so that the parties hereby declare that they will submit and obey the price fixing so that one party and the other party are not entitled to ask for an increase or decrease in price. There are also specifications and implementation requirements as well as sanctions that must be met by the second party.

5.1.4

Unit of Certification can show evidence that parties from the organization's representatives, both plasma smallholders and independent smallholders, have been involved in the decision-making process and understand the contents of the contract. This is stated in the Work Agreement (SPK) document which is signed by all representatives of the cooperative management and farmer groups. The Work Agreement (SPK) contains the sale and purchase agreement of FFB to independent smallholders, as well as a partnership agreement with plasma farmers. Based on this explanation, it is known that the Certification Unit already has involved all parties.

5.1.5

Unit of Certification shows CLA with Smallholders FFB Suppliers or contractors which explain the object of the agreement, validity period, plasma construction provisions, and terms of cooperation, financing, pricing, rights & obligations, sanctions to settle disputes. The agreement was signed by both parties.

For example; FFB purchased agreement No. 010/SPK/SSS-KTJ/X/2019 PT Surya Sawit Sejati and Koperasi Karya Tunggal dated on 1 October 2019 valid until 10 years, 30 September 2029.

5.1.6

Based on document verification the unit of certification has payment receipt document for FFB production and pricing on 11 May 2022 to Koperasi Karya Tunggal Jaya. Payment is made based on the Minutes of the FFB sale and purchase which has been agreed and signed by all parties.

Based on this explanation, it is known that the management unit has made payments to supplier FFB in accordance with the agreement it has, either the payment period or the specified price.

5.1.7

The results of observations and interviews with weighbridge operators obtained information that the certification unit has routinely performed the calibration of weighing equipment by third parties. The certification unit has also shown documents on the weighbridge calibration carried out in 2022.

5.1.8

The certification unit also obtains FFB supplies from smallholder schemes. Currently, smallholders are only at the stage of socialization and consultation with FFB suppliers, but they have not yet reached a meeting point where the suppliers will carry out RSPO certification, this is due to the factor of certification costs that are not able to be met by farmers.

5.1.9

Companies that have a system to deal with complaints contained in:

- SOP for stakeholder communication and consultation with no. SOP SSS-01-HMS-15
- SOP for Internal and External Complaints with SOP number: SOP-HRD-07-R00
- SOP Settlement of land disputes with SOP No: SSS-COMDEV (HMS)-024

Commitment has been demonstrated regarding reporting of violations (whistleblowers) signed by the President Director dated December 13, 2017. In point 4 reads: "If the reporter does not want to be identified, the company will keep the identity confidential, except if required by the court".

Status: Comply

**5.2
The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.**

5.2.1

The certification unit has conducted socialization with the farmers who are the FFB suppliers to PT Surya Sawit Sejati as shown by the evidence of the RSPO Socialization and Company minutes on 6 December 2021 which was attended by 15 participants. The activities include, among others:

- Understanding of RSPO, ISPO, ISCC and GSEP
- Environmental Management Aspect
- Aspects of Social and Community Role
- Aspects of the work environment and industrial relations

In this socialization activity, the certification unit also promoted the RSPO that in the future external FFB suppliers must also participate in RSPO certification. Based on the results of the socialization conducted to FFB suppliers, conclusions were drawn, including:

- FFB suppliers in the form of companies have not been able to participate in RSPO certification due to company policies that have not been able to undertake to participate in RSPO certification, but currently these companies have followed ISPO certification to fulfill obligations from National regulations.
- FFB suppliers in the form of smallholders have not been able to participate in RSPO certification activities due to financial constraints which are quite expensive for them, but so far the implementation of their management has followed what has been socialized by companies that violate the RSPO standard.

5.2.2; 5.2.3; 5.2.5

Certificate holder was not developed and implemented livelihood improvement programmers including the RSPO Standard for Independent Smallholder. This because there was no Independent Smallholder in PT Surya Sawit Sejati. Which in this case, made this indicator was not applicable for the assessment.

5.2.4

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

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

**6.1
Any form of discrimination is prohibited.**

6.1.1; 6.1.2

The company has a Human Rights Policy which was signed by the President Director on 23 July 2018, points 2 and 3 which state that:

- We ensure that every individual is treated fairly and protected from all forms of discrimination that may violate their human rights
- We ensure equal opportunity is given to all individuals. The recruitment, promotion and remuneration processes are all based

on an individual's eligibility and merit assessment regardless of religion, ethnicity, age, gender, nationality or physical disability.

The company also has gender policy dated July 23, 2018 which states that: "PT SSS is committed to maintaining a workplace free from any kind of disturbance, including disturbances based on race, color, religion, gender, country of origin, ancestry, disability, marital status and sexual orientation.

The company has also shown documentation of socialization of company policies including human rights policies, such as:

- Recording of gender and human rights socialization on 10 June 2022 to 9 workers
- Recording of gender and human rights socialization on 12 July 2022 to 12 workers
- etc

Based on the verification of the labor register documents and interviews with representatives of workers through labor union, known that the workers come from various regions such as Java, Kalimantan, Nusa Tenggara Barat and others. From the results of interviews with labor union and workers, known that there is no indication of discrimination against workers. In addition, the results of interviews with village representatives, obtained information that there is no indication of discrimination. The company has provided equal opportunities for the surrounding community to get jobs.

6.1.3

The company has kept a track record of employees. For employee recruitment, the stages for recruitment are job application letters, CV, copies of identity cards, and supporting documents such as certificates, diplomas, transcripts and others. The company shows employee track record documents stored in each unit (factory and plantation).

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

Promotion

- Decree No. 036/SSS/HRD-Prom/VI/2022 dated June 21, 2022 regarding the promotion from boiler operator became boiler staff. The company has shown the results of the assessment / performance with the results of being able to be promoted to boiler staff.
- Decree No. 002/SSS/HRD-Prom/II/2022 dated February 18, 2022 regarding the promotion from harvesting worker became harvesting supervisor (foreman). The company has shown the results of the assessment / performance with the results of being able to be promoted to harvesting supervisor (foreman).

Recruitment and assessment for the appointment of permanent worker:

- Letter of Labour Agreement (trial period) No. 003/SKKB/SSS/PKS/Umum/III/2022 dated March 14, 2022 with the position of General Worker. The agreement has explained the rights and obligations of workers with a probationary period until June 14, 2022. Also attached are documentation such as job application letters, results of assessments and interviews, results of health checks and others so it is recommended to become employees on probation. The employees based on the results of the assessment have been appointed as permanent employees according to Decree No. 006/SK-Pers/SSS/ED/VI/2022 dated June 10, 2022. The company policy has also been conveyed to employees by attaching an addendum to the work agreement that informs all company policies.
- Work Agreement probation period No. 008/SKKB/SSS/PKS/Umum/VI/2022 dated 11 June 2022 with trial period until 12 December 2022. Recruitment documentation has also been shown such as job application, ID card, the results of the employee's health examination etc.

The results of interviews with workers and labor union revealed that labor procedures have been implemented by the company in accordance with applicable regulations. They also known that workers have already know about employment procedures such as termination, retirement or promotion.

6.1.4

Based on interview with women workers as well as gender committees revealed that pregnancy tests were only conducted for pesticide applicators to avoid the employees being exposed to pesticides. Further explained that so far there had never been a pregnancy test which was a discriminatory measure.

6.1.5

The company already has a women's committee called Gender Committee to deal with women's issues, women's skills development and others related to women. The Gender Committee structure consists of chairpersons, secretaries, treasurers and members, structure of gender committee consists of male and female workers.. The organization also has development programs or work programs such as:

- Socialization gender committee
- gymnastics
- And others.

The results of interviews with female workers such as spraying worker, and daycare officers, known that the workers already know the gender committee and the functions of the organization. Workers are also aware of gender committee representatives if there are complaints or complaints related to women's problems or issues. The results of interviews with representatives of women's committee and women workers, it was found that there were no complaints related to women's issues in the last 3 year.

6.1.6

The determination of wages at PT Surya Sawit Sejati is based on the minimum wage in Kotawaringin Barat District based on the Decree of the Governor of Kalimantan Tengah No. 188.44/445/2021 on November 30, 2021. The Minimum Wage for Kotawaringin Barat District in 2022 is Rp.3,077,218. Related to this, the company has Memo No. 415/HRD/INT/UP-PT.SSS/XII/2021 dated December 23, 2021 regarding the District Minimum Wage of Kotawaringin Barat 2022 amounting to Rp.3,077,218

The results of the verification of workers' wages (eg. security NIK RE05247 & RE05291), it is known that the company has given the same wages for the same grade and same scope of work. The results of interviews with workers in the same grade stated that the company has given the same salary for the same scope of work.

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; 6.2.2; 6.2.3

The company has The Collective Labor Agreement between PT SSS and the Labor Union for the period December 2021-December 2023. The CLA has been registered at the Manpower and Transmigration Office based on the Decree of the Head of the Manpower and Transmigration Office of Kotawaringin Barat Regency No. Kep.72/DTT/HIJ-Syaker/XII/2021 dated December 31, 2021. The CLA explained about employment relations, leave and absence from work, wages, social security, termination of employment, complaints and others.

The company shows list of the number of workers for the June 2022 as follows, including Runtu Estate: 331 workers, Lada Estate : 615 workers and Mill: 73 workers. The number of contractor workers such as CV Bahri is 8 workers and CV Guntur Saputra is 5 workers.

From the results of interviews with workers and labor union, known that the company has provided a copy of the agreement to the workers. From the interview also known that the company has given socialization related to collective labor agreement to workers.

The company has shown evidence of compliance with labor provisions, through:

- Payroll documentation that give information on compensation for all work performed. The results of the simulation of wages and overtime in June 2022, known that the company has paid overtime wages according to the workers' overtime hours and has complied with the applicable regulations. The simulation samples for overtime calculations for example:
 - Worker with initial KA, has get overtime wages of Rp.1,397,576 (43 hours)
 - Worker with initial NH has get overtime wages of Rp. 768,711 (26 hours)
- Worker's salary slip that informs wages, number of days attended, number of leave and others.
- Employee leave forms, such as:
 - Form for giving worker leave permit with worker ID No. LH01163 on 7 – 13 October 2021
 - Form for maternity leave for woman worker with worker ID No. LH01163 from November 1, 2021 to January 30, 2022
- Employee Attendance document every month which informs the number of attendances, leave, illness and others.

Based on document verification, interview with workers (harvesting workers, manuring workers, factory workers, etc) known that there's no indication about the force labor. In addition, they get the wage accordance with the wage minimum regulation. Based on interview with harvester and wage simulation, known that harvest workers' wages are based on their work (base/target). If the worker get the base/target, then he gets a premium, and if the worker does not get the base/target but has worked for 7 hours, then the worker gets 1 working day's wages (worth the minimum wage per day)

Interview with labor union and workers, said that wages paid are in accordance with applicable regulations. Based on that interview also known that deduction for workers such as BPJS deduction tax and has been described in the company regulation. Based on interview with contractor and verification of wages of contractor workers known that contractor workers have given minimum wages by contractor.

6.2.4

The results of field observations in housing areas and interviews with workers and labor union known that the company has provided housing facilities, infrastructure and facilities that are decent/in good condition to workers such as houses, clean water facilities, religious facilities, sports, school buses, ambulances, clinic and others. The condition of the house has good sanitation. From the interview, also known that in each housing location there are child care areas, trash bins, generator rooms/houses (to provide electricity), bore wells and others.

6.2.5

The results of field observations in housing areas, interviews with workers and employee cooperative management, it is known that there are employee cooperatives in housing areas that sell workers' basic needs at competitive prices. In addition, the distance between the nearest city and residential locations (estate) can be reached in approximately 30 minutes. Based on this it can be concluded that the certification unit has made efforts to improve workers' access to getting decent, adequate and affordable food.

6.2.6

The determination of wages at PT Surya Sawit Sejati is based on the minimum wage in Kotawaringin Barat District based on the Decree of the Governor of Kalimantan Tengah No. 188.44/445/2021 on November 30, 2021. The Minimum Wage for Kotawaringin Barat District in 2022 is Rp. 3,077,218. Related to this, the company has Memo No. 415/HRD/INT/UP-PT.SSS/XII/2021 dated December 23, 2021 regarding the District Minimum Wage of Kotawaringin Barat 2022 amounting to Rp. 3,077,218.

In relation to DLW (Decent Living Wage), the company has tried to do Prevailing Wage calculations for each unit, which included samples of In-Kind Benefits, such as Housing, water, electricity for home, Healthcare, etc. The result of DLW calculation for 2021 is IDR 3,537,342.80.

6.2.7

Based on the results of the verification of work agreement documents and interviews with stakeholder, it was found that previously there were workers with PKWT (temporary worker) status at PT Surya Sawit Sejati. As for PKWT workers (as many as 40 workers) for maintenance work and their validity period expired on June 30, 2022. And during this audit, there were no PKWT at PT SSS anymore.

The company shows examples of PKWT agreement, for example No. 003.SPKWT/UP-PT.SSS/IV/2022 dated April 11, 2022 and is valid until June 30, 2022 for the maintenance work. In addition, the company has also provided compensation for PKWT whose work period has ended in accordance with applicable regulations.

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; 6.3.3

The policy regarding labor unions is contained in the Human Rights Policy signed by the President Director on July 23, 2018, which explained respect for the right of every individual to form, participate in and take part in registered labor unions and negotiate collectively.

The company has provided socialization related to company policies including Human Rights Policy, for example:

- Recording of gender and human rights socialization on 10 June 2022 to 9 workers
- Recording of gender and human rights socialization on 12 July 2022 to 12 workers
- etc

The results of interviews with workers such as harvesters, spray workers, FFB loader, factory workers and others, known that the company has provided socialization related to freedom of association. As a form of implementation of freedom of association at PT Surya Sawit Sejati, there has been a labor union (SPSI) in the company and it has been registered with the Manpower and Transmigration Office of Kotawaringin Barat Regency with registration number 568/495/DTT/HIJ-Syaker/VI/2022 dated 2 June 2022

Based on the results of interviews with the labor union, it is known that the company does not interfere in the activities of the workers' organizations. The labor union officials are elected by workers based on voting results.

6.3.2

The company shows the labor union meeting documents, for example:

- Minutes of the meeting on 20 June 2022 related to the meeting of the management and members. The meeting discussed the reporting of the number of management and union members up to June 20, 2022.
- Minutes of the meeting on July 29, 2022 between SPSI and the company which discussed overtime for the harvest foreman, facilities and others attended by 19 participants

Status: Comply

6.4

Children are not employed or exploited.

6.4.1; 6.4.2; 6.4.3; 6.4.4

The company has a policy regarding age requirements contained in the human rights policy dated July 23, 2018 point 9 which states: "We will not tolerate the use of child labor, forced labor, slavery or human trafficking in all areas of the company. We use the definition according to the United Nations Convention on the Rights of the Child which states that children as individuals who are less than 18 years of age.

The company has provided socialization related to company policies including child protection policies on 10 June 2022 and 12 July 2022.

The company has also shown agreement with contractors that have explained the prohibition on employing children under 18 years of age, forced labor and workers from human trafficking, for example agreement No. 002/ADD-SSS/IV/2022 dated January 1, 2022 and agreement No. C006 A/ADD-SSS/VII/2022 dated January 1, 2022.

The results of the verification of the labor list document, interviews with internal and external stakeholders, and field observations revealed that there was no indication of any workers under the age of 18. In addition, the results of field observations in the office, housing and operational areas of the company also provided planks for the prohibition of the use of child labor.

Status: Comply

6.5

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

6.5.1

The company's policy on preventing sexual harassment and violence is set out in the form of a gender committee. In addition, the company has a Sexual Harassment Complaint Procedure (Gender Committee) No. SOP-HRD-014-ROO dated January 1, 2016 is also a form of policy implementation.

The results of interviews with workers, especially female workers, revealed that the company had provided socialization related to policies to prevent sexual harassment and violence and protect reproductive rights. The company already has a gender committee to deal with women's issues or concerns. The results of interviews with representatives of the gender committee and women workers revealed that there were no cases of violence or sexual harassment in the last 3 years.

6.5.2

The company also has a policy on the protection of reproductive rights issued on July 23, 2018 signed by the President Director. These policies explain the protection of the right to get pregnant and give birth, transfer pregnant workers to light work, and not be exposed to chemicals. It also explains the rules for maternity leave.

The company has also showed the dissemination of reproductive rights protection policies, such as on 22 June 2022 and 27 July 2022.

The results of interviews with workers, especially female workers, revealed that the company had provided socialization related to policies on preventing sexual harassment and violence as well as protecting reproductive rights. In addition, from the interviews, information was also obtained that the company gave permission/maternity leave, menstrual leave and breastfeeding permission.

6.5.3

The company has identified the needs of new mothers which has been carried out on February 17, 2022. One of the results of the identification is by giving permission to breastfeed to workers. The results of interviews with female workers and representatives of the gender committee revealed that the company had given permission or time to breastfeeding mothers.

6.5.4

The company has the following procedures:

- Violation Reporting Mechanism No. SOP SSS-EST-30 dated December 23, 2017. The stages of reporting include:
 - Reports can be submitted via phone number, email, sms
 - The officer will record the report and submit it to management
 - The company will verify the report
 - If the results of the investigation into the report prove to be true, the company will take the necessary action.
 - If the complainant feels that the company has not provided a solution to the report, the complainant can submit this to the RSPO Complaint System
- SOP for Internal and External Complaints No. SOP-HRD-07-R00 dated December 14, 2020. In the procedure, it is explained that:
 - Settlement of employee complaints is resolved within 30 working days of the complaint. If it is not resolved within 30 working days, a bipartite process will be carried out which will be carried out within 10 working days. And if it has not been resolved, it will be handled according to the applicable law and labor law (tripartite process).
 - Complaints from external parties are resolved within 30 working days of the complaint

The company also has a Whistleblower Policy dated July 23, 2018 which explains that the company protects independent and confidential reporting of violations.

The results of interviews with workers and labor union known that workers understand the grievance mechanism. Complaints can also be submitted to labor union. From the results of the interview, it was stated that workers' complaints were usually related to complaints about housing improvements and had been followed up by the company. As for complaints related to women's issues can be submitted through the gender committee.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1; 6.6.2

The results of the verification of the labor register documents, work agreement documents, interviews with labor union, management, and the results of field observations revealed that there were no casual daily workers or contract workers who were directly employed by the company. Previously, there were workers with PKWT status at PT Surya Sawit Sejati. PKWT workers were recruited for maintenance work and have expired on 30 June 2022 as many as 40 workers and have been registered with the Manpower Office. And when the surveillance-3 audit was carried out, there were no PKWT anymore and there were only permanent workers at PT SSS. From the results of interviews with workers, known that there is no forced labor in the company. All workers who work are in accordance with the mutually agreed agreement or letter of appointment.

The company also showed the probationary agreement for example No. 008/SKKB/SSS/PKS/Uumum/VI/2022 dated June 11, 2022.

The agreement has explained several terms of work, rights and obligations of workers and others. For example responsibilities, wages, leave, social security and others. From the results of interviews with workers, known that the company has provided a copy of the agreement to the workers.

Status: Comply

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

6.7.1
 In accordance with the Decree of the Head of the Kalimantan Tengah Province Manpower and Transmigration Office Number: KEP.80 / DISNAKERTRANS / VII / 2020 concerning the Ratification of the PT Surya Sawit Sejati Committee for Occupational Safety and Health dated July 2, 2020. As stated in the decree, those who are responsible as OHS Committee secretary is a worker with the initials NRY. OHS Expert Authority Card Number Reg.39695 / PK3 / AJ / 62/2020 / P1 dated 19 August 2020 valid until 2023 and Decree of the Minister of Manpower of the Republic of Indonesia Number 5/6986 / AS.02.04 / VIII / 2020 concerning The appointment of a General Occupational Safety and Health Expert PT Surya Sawit Sejati on August 19, who designated NRY as General OHS Expert of the company. The decree is valid for three years.

The management unit can show the recording of regular P2K3 meetings which are held every 3 months from the 4th Quarter 2021 to the 2nd Quarter of 2022, for example the 2nd Quarter 2022 meeting held on 29 June 2022 held in the Lada Estate Division 1 Meeting Room which was attended by 16 P2K3 management representative at PT SSS. The agenda discussed at the meeting included:

- Explanation of the Latest Covid 19 Conditions and hopes to ensure progress.
- Discussion of potential hazard findings and suggestions for follow-up for the period January to March 2022.
- Discussion of the Work Plan for July-September 2022.

There are several work plans for the P2K3 Management from July to September 2022

- Improve the degree of Occupational Health and Safety and the work environment
- Increase the knowledge of workers regarding occupational health and safety in the workplace so as to minimize work accidents
- Preventing land fires in the company
- Monitoring and Evaluation of Occupational Health and Safety implementation in each Estate.

6.7.2
 Among them are regulated in the PT Surya Sawit Sejati OHS Management System manual. SOP related to OHS include: Chapter I. Occupational health and management systems; Chapter II OSH Policies and Principles; Chapter III. Establishment of the OHS Committee; Chapter IV. Operational safety procedures; Chapter V. emergency response plans; Chapter VI. Electrical safety; Chapter VII. Occupational health and hygiene; Chapter VIII. Safety inspections and audits; Chapter IX. Personal Protective Equipment, Chapter X. Occupational health and safety training; Chapter XI. Promotion and communication; Chapter XII. Investigation and reporting procedures

First aid officer

For example, this is indicated by certificates number 17 / P3K / IX / 2015 and 1327 / PK3-P3K / III / 2017. In addition, every foreman, both estate and mill, is also given first aid training.

6.7.3
 The management unit has facilitated every worker with PPE which is provided free of charge. In addition, special facilities such as rinse houses and supporting facilities for special jobs are well available. some records of providing PPE to workers can be documented by management. The management unit can show documents monitoring the expenditure of PPE for workers. Some examples of PPE replacement include:

- Delivery of PPE to fertilizer worker on 21 June 2022 for Dust Masks, Gloves and Boots.
- Delivery of PPE to Spray workers on 21 June 2022 PPE Respirator masks, Gloves, and Boots.
- 68 Safety shoes for process workers. 43 Pcs Cloth Masks, 13 Pcs Vapor Mask Cartridges, 8 Safety Helmets, 4 Rubber Gloves, 41 Cloth Gloves, 42 Earplugs, 10 Earmuffs and so on.
- Provision of Respirator masks on 6-7 June 2022 to 5 workers
- Delivery of safety shoes to Mill workers for the period of 10-15 May 2022 to 62 people

Based on the results of field visits at several plantation and mill locations, it is known that every worker has used PPE in accordance with the results of the identification of existing risks. In addition, workers have understood the mechanism for replacing PPE when the PPE has been damaged.

6.7.4

The company has shown evidence of having included workers in the BPJS employment and health programs, as evidenced by proof of BPJS payments, including:

- Evidence of payment of BPJS Health (PT SSS) in July 2022 paid on July 4, 2022 with Transaction ID 202207040853754813
- Evidence of payment of BPJS Employment (POM) for June 2022, paid on July 14, 2022 with transaction ID 20220714149530199 for 73 workers
- Evidence of payment of BPJS Employment for June 2022, paid on July 14, 2022 with transaction ID 202207141421531548 for PT SSS plantation unit
- Evidence of payment of BPJS Employment in June 2022 for harvest workers paid on July 14, 2022 with transaction ID 202207141422532255

Based on interviews with labor union and workers, it was concluded that all employees know the procedures for medical services in the event of an accident or illness. All employees interviewed also claimed to have BPJS health cards, if they went to the company's clinic for treatment there was no charge at all. Based on interviews with representatives of contractors, it is known that the contractors have included their workers in BPJS employment.

During that period there were 2 accidents with the fatality category. It has been shown that the OHS performance evaluation due to the occurrence of work accidents. With the accident, the company has made work accident investigations, reports to BPJS TK, to evaluate potential hazards and follow up. The company has also assisted in handling work accident insurance claims

6.7.5

The management unit shows the document of Work Accident Calculation for PT SSS period of 2021 with a total of 65 work accidents. The total number of Working Hours during 2021 is 2,493,855 Hours. Frequency Rate (FR) calculation, it is known that the FR value is 26.06 indicating that there has been a loss of working time of 26.06 hours/million people. Severity Rate (SR) calculation, it is known that the SR value is 2,546.66, which means that in the 2021 period there has been a loss of 2,546.66 days of work/million hours of work. And Lost Time Injury Frequency Rate (LTIFR) it is known 26.06.

Status: Comply

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

7.1

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

7.1.1

The company has shown evidences that pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) method. The IPM programs in PT SSS includes the development of the planting of *Turnera subulata*, *Antigonon leptopus* and carrying out the use of natural enemies of pests such as *Felis bengalensis* and etc.

The company has shown documentation of monthly potential pest and disease detection of each unit that conducted by trained worker. Based on census summary and maps of infestation of January – September 2020, known that there was no pest and disease infestation exceed the economical threshold, therefore no usage of pesticide to pest and disease control, except for routine weed control.

7.1.2

Based on document review, the company implement some biological control practices to suppress pest and diseases infestation such as *Turnera subulata*, *Antigonon leptopus*. Verification result on website of cabi.org and forestry & environmental ministry regulations NO.P. 94 / MENLHK / SEKJEN / KUM.1 / 12/2016. known that those species stated as not invasive in Indonesia.

7.1.3

Based on the results of field visits, interviews with stakeholders and management, it was found that there was no indication of the use of fire as a means of controlling pests.

Status: Comply

7.2

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

7.2.1, 7.2.2

The company has a Pesticide Recommendation for the usage of pest, weed and disease control, consist of 13 trademarks of pesticide. However, current routine usage just for weed control because there is no pest and disease infestation above the economic threshold. The company has demonstrated policies related to safety in the use of chemicals listed in SOP No. SSS-EST-03 dated December 10, 2007. The company has made efforts to avoid the development of resistance to weeds such as the use of different types of pesticides, regulating spray rotation and spraying according to target weeds (selective weeding). The Pesticides Recommendation inform the pesticides trademark, active ingredients, type (systemic/contact), LD50, target species, and WHO class.

Based on observations and interviews with spraying workers in Field 103/104 Division 2 Lada Estate it is known that worker have carried out spraying in accordance with their procedures such as not spraying near water bodies, have knowledge of the types of pesticides used, understand the dosages used as well as being able to identify the intended target weed. Based on this, it can be concluded that the company can demonstrate procedures and implementation related to safety in the use of chemicals.

7.2.3

The integrated pest control plan owned by the company is contained in an annual budget that informs about the detection and census plans, types of pests, and tools and materials if there are pest attacks that exceed the threshold. Implementation of the plan is to detect and census and control pests.

The company has shown the 2021/202 Integrated Pest Management (IPM) Continuous Improvement Program document. An example is the planting of *Turnera subulata* in Runtu Estate. In addition, based on the results of a field visit in Block E01, Runtu Estate, it was found that the company had planted a beneficial plant.

The company has shown documents on the use of pesticides during the period 2019-2022. Based on these data it is known that in general at Runtu Estate & Lada Estate has a decrease number of pesticide used. In addition, since 2019 there has been no use of pesticides made from *brodifacum*.

7.2.4

The company can show the SOP for Control of Weeds, Pests, and Diseases with Document No. SSS-EST-03 where the SOP explains everything that weeds, pests and diseases control activities pay attention to environmental, social, work safety aspects and in accordance with technical instructions. The SOP also explains that to control all weed, pest and disease control activities in accordance with environmental management objectives.

The scope of all maintenance activities for immature plants along with controlling environmental aspects related to maintenance activities for immature plants in the garden starts from preparation, field implementation to reporting inspection activities.

Based on data on the use of pesticides and herbicides during 2021 and 2022, it is known that the use of pesticides is not carried out for preventive purposes, but is applied when the data from the census results exceed the threshold.

7.2.5

The company can show a permit from the Manpower and Transmigration Office with No: 566/21/PK.12/Disnakertrans/V/2020. The use of paraquat pesticides already has a permit from the relevant agency and can be proven also by the evidence of training on the use of limited pesticides carried out by each sparring work unit.

7.2.6

The company can show a pesticide use training document for the period 2021 which includes training for integrated pest management and proof of its realization. The company also already has an SOP with No. SSS-EST-23 concerning Handling of Fertilizers and Pesticides. The SOP describes:

- Identification of Hazardous Chemicals
- Procurement of Hazardous Chemicals
- Handling of Hazardous Chemicals
- Handling of Expired Hazardous Chemicals

7.2.7

The Company has a SOP for handling hazardous Waste (Management, use and storage) with number of SOP PROSES-SSS / 020 / Mill dated 01 December 2013. The SOP contains procedures regarding: General Storage Requirements for hazardous Materials, Storage Building Requirements, Procedure for Use and Expense and Reporting. The company can shows evidence of schedule waste dispatch which is discussed in more detail in indicator 7.3.1. Based on the results of visits to chemical warehouses and hazardous waste warehouses, it is known that the management of hazardous materials and hazardous waste has been carried out in accordance with procedures.

7.2.8

The certification unit has SOPs and work instructions related to hazardous waste management which are contained in the

- SOP for Management of Hazardous and Toxic Waste No. SSS-EST-21 revision 01 dated 15 August 2020 which was ratified by the President Director. This procedure explains the reference references, procedures, where to store hazardous waste, how to store hazardous waste, storage time, recording, transportation and collection, reporting, and OHS procedures.
- Regarding the procedure, unit certification applies the steps outlined in the work instructions, by doing:
 - Remove the lid and empty the container, then rinse as soon as possible.
 - Fill with water or rinse fluid as much as 20% of the total volume, and shake.
 - Used rinses pour in the spray tank.
 - Drums that are not reused, perforated or broken.
 - Deliver the waste warehouse.

Based on interviews with employees and the foreman of pesticide application Runtu and Lada Estate, it is known that all pesticide packaging is collected at the designated storage area and the company coordinates with collectors to recycle and not be used for purposes other than pesticide application activities.

7.2.9

The company does not apply pesticides by air

7.2.10

The management unit shows the results of the Special examination carried out in the Lada Estate area, the Health examination consists of Audiometry and Cholinesterase examinations. The examination was carried out by the Prodia Laboratory on December 9, 2021. Cholinesterase 85 workers and 2 Audiometri (Lada estate) 33 people checking Cholinesterase and 1 person checking Audiometry. The re-examination was carried out on June 15, 2022. From the results of the follow-up health examination, it is known that the worker is declared fit to work.

7.2.11

Based on the results of the document review, interviews with workers who came into contact with chemicals in the field, it was found that there were no workers who were pregnant. workers who come into contact with chemicals while pregnant or breastfeeding are transferred to other parts of the job.

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 certification unit already has SOPs and work instructions related to Hazardous and Toxic Waste management which are contained in the SOP for Waste Management with the document number SOP No. SSS-EST-21 rev. 01 dated 15 August 2020. This procedure is made to ensure that the management of hazardous and toxic waste is carried out with full responsibility and to prevent contamination/pollution of the environment by hazardous waste, in accordance with applicable law (referring to PP RI No. 22 of 2021) concerning the implementation of protection and environmental management, including: scope and responsibilities, references, procedures (identification, storage of hazardous and toxic waste, storage methods, storage time, waste recording,

transportation and collection, reporting, safety, and emergency response), symbol hazardous waste.

Unit certification has a temporary storage permit for hazardous and toxic waste, through the document;

Hazardous Waste Warehouse of Lada Estate

Permit for temporary storage of hazardous and toxic waste materials PT Surya Sawit Sejati – Lada Estate through the Decree of the Head of *Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu* (DMPTSP) Kotawaringin Barat Regency No. 503/020/LH/DPMPTSP.D dated October 31, 2019, with a validity period of 5 years. Coordinates of storage area at 02°34'47.6 S and 111°46'25'2" E

Hazardous Waste Warehouse of Runtu Estate

Permit for temporary storage of hazardous and toxic waste of PT Surya Sawit Sejati – Runtu Estate through the Decree of the Head of the *Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu* (DMPTSP) of Kotawaringin Barat Regency No. 553/009/LH/DPMPTSP.D dated April 16, 2019, with a validity period of 5 years. Coordinates of storage area at 02°22'77.6 S and 111°43'55'9" E

The types of waste that may be stored include; used lubricating oil, used hazardous packaging, used LED lamps, medical waste, waste from laboratories containing hazardous materials, and used rags from their activities.

From the results of field visits to Lada Estate and Runtu Estate waste storage, it was found that the storage building is equipped with safety equipment including alarms, fire extinguishers, eye wash showers, and other emergency response equipment such as first aid kits. From the results of interviews with storage officers, it is known that the officers understand the procedures for handling hazardous waste, and handling emergency events in the area.

In its implementation in the field, the unit certification already has a cooperation agreement with a third party named PT Semesta Langgeng Sentosa to handle hazardous and toxic waste. With agreement No. 025/SPK-SSS/III/2022 dated 6 April 2022 until 6 April 2023. In the management, utilization and/or processing of waste, PT Semesta Langgeng Sentosa with licensed parties, namely PT Hampanan Anugerah Nusantara PT Putra Restu Ibu Abadi, PT Sumber Anugerah Utama, PT Triguna Abadi, PT Tenang Jaya Sejahtera, and PT Balikpapan Environmental Services.

Regarding domestic waste, the company conducts landfills and waste separation with economic value. Based on the results of field visits to housing, it was found that each house has its own trash can, waste transportation is carried out 2 (two) times a week.

7.3.2

From the results of the document review by comparing the balance sheet and logbook, it can be seen that the submission of waste to storage for July 2022 was appropriate and there was no difference in the amount submitted. Thus it can be concluded that there are no recording errors and discrepancies based on the Balance Sheet, Logbook and Festronik documents, this indicates that the company has properly documented the storage and handling of hazardous waste. So it can be concluded that the company carries out waste disposal according to procedures that are fully understood by workers and managers.

7.3.3

The results of field visits in several areas of estate or Mill did not find any indications of waste destruction by open burning. It is also proven through the waste transportation manifest and the results of field observations in housing area that there were no traces of burning activities. Interviews with employees who live in the housing estate also stated that they had never burned waste due company commitment.

Status: Comply

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

7.4.1

The company can show the SOP on Fertilization Work Instructions with No. SSS-EST-08 where the SOP explains all fertilization activities taking into account environmental, social, work safety aspects and in accordance with technical instructions. The SOP also explains the purpose of harvesting in accordance with the objectives of environmental and social management.

7.4.2

The company determines that sampling for soil analysis is carried out every two years and leaf analysis every year. Extraction of leaf tissue is carried out regularly every year to be used in the calculation of annual fertilizer dosage recommendations. The soil analysis parameters covering texture, acidity (pH), contents of N Total, P-Total, K, Ca, Mg, B, Cu, Zn. Meanwhile, the leaf analysis parameters covering of N, P, K, Mg and Ca and Indicator Minor elements namely B, Cu and Zn. Other than that, the visual analysis which is done as part of the points in determining the fertilizing recommendation, identifying nutrient deficiency symptoms, and analyzing the disease attacks that are potential in becoming an endemic of certain disease. For instance, the result of sampling of PT SSS has been sighted based on report on July 2022 and soil sampling in November 2021.

7.4.3

The efficient and non-excessive in-organic fertilization are critical to maintain soil structure and texture, combined with manuring by POME land application and EFB mulching application. The manuring conducted especially in land with low nutrient properties, to improve soil structure and texture, microbiological properties, as well as to minimize in-organic fertilization if possible.

7.4.4

The management unit can show the planning documents and the realization of fertilization for the period of 2021 and 2022. From the results of the document review, it is known that fertilization for 2021 has been fully implemented with the achievement of 100% while for fertilization for the 2022 period. The realization of fertilization in the first semester of 2022 has been achieved according to the existing recommendations.

Status: Comply

7.5

Practices minimize and control erosion and degradation of soils.

7.5.1

The company has a map of Soil Type Estate with a scale of 1: 50,000 which was made by the PT SSS GIS team in 2016. The map explains the types of soil contained in the company's operational area are inland soil, Flood Prone Area, Inland Sandy Soil, and peat. Types of soil that are classified as marginal are peat, flood areas, and acid sulfate.

Based on the topographic map made by the GIS team of PT Surya Sawit Sejati with a scale of 1: 120,000 years, it is known that the dominant operational area of the company is flat bumpy. There are no steep slopes that require monitoring and special treatment when it is decided to plant.

7.5.2, 7.5.3

Based on the results of field visits and document studies, it is known that there has been no replanting activity in the management unit area.

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 the results of field visits and document studies, it is known that there has been no replanting activity in the management unit 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 & 7.7.2

There latest oil palm planting is in 2009, and the CH has no plan in any area expansion. Peat inventory has been reported to RSPO Secretariat by email on 14 November 2019

7.7.3

Based on soil detail map there is ± 756 ha peat soil in all unit. Distributions of peat soil are 326 hectares in Lada Estate and 430 hectares in Runtu Estate. The peat soil management and strategy is contained in procedure SSS-EST-19 document on Cultivation Management on Peatlands. The management of peat soil has been manifested in the document of soil maps, peat maps, drainage

maps, piezometer and subsidence pole maps, Watergate maps, as well as documentation of piezometer and subsidence measurement. The water management document such as drainage and water gate maps, as well as water level stick and piezometer, and water level monitoring document that monitored routinely every weeks.

7.7.5

Based on the results of interviews with management and review of documents regarding the replanting plan, there will be no replanting activities on peatlands for the next 5 years.

7.7.6, 7.7.7

The management unit can show monitoring documents for the management of peat areas in the company's area such as water level measurements, piezometer calculations and subsidence measurements. In addition, for peat areas in areas that are not open, the management unit maintains the area as a conservation area.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The certification unit already has a surface water quality management and monitoring program to support the utilization of water sources contained in the RKL-RPL report document which is managed and reported every semester, for the period of semester 2 of 2021 (July-December). Testing of surface water quality is carried out by PT Mutuagung Lestari with KAN accreditation for 5 sampling points, Rangit River, Rangit sub-River, Biru River, Kumai River, and Pemalingan River.

From the results of testing the quality of river water, it is known that there are several parameters (TDS, TSS, pH, BOD, CO, Amonia, Klorida and Sulfat) that are above the quality standard used, namely PP RI No.22 of 2021. Based on the results of trend evaluation and efforts that have been carried out by the company, the increase in several parameters is also influenced by other activities at upstream of the river before entering the certification unit area. PT Surya Sawit Sejati carries out several management activities to improve the quality of river water, including:

- Ensure that SOPs for Watershed Protection are carried out in accordance with established procedures.
- Perform river border maintenance and carry out rehabilitation by planting various types of native trees or other fast-growing plants.
- Planting trees in conservation areas.
- Maintenance of drainage channels around the estates block, so that these channels are not clogged and do not flow directly into rivers or creeks.
- Reducing pesticide use.
- Supervision of the use of fertilizers and pesticides in the field, consistently according to the recommendations in terms of type, dose, and method of application in the field.
- Conduct periodic water quality analysis, and report to the authorized agency.

In order to provide access to clean water and ensure that the air used by workers and the community is not contaminated, the certification unit also conducts periodic monitoring of sampling points in offices and housing area. Based on the results of monitoring the quality of the raw water, it is known that there are two (2) parameters that are above the quality standard, there are turbidity in one (1) monitoring point and the number of *E.Coli* at five (5) monitoring points. As part of the improvement, PT Surya Sawit Sejati carried out several management activities to improve the quality of raw water, such as;

- Perform periodic cleaning of water reservoirs/tendons
- Using a water treatment plant for residential raw water
- Installing refill drinking water treatment machines for employees
- Conduct water quality analysis.

From the description above, it can be concluded that the certification unit has managed water sources for continuous availability, and avoided negative impacts on other users in the catchment area, by measuring water quality on a regular basis and free access to the availability of clean water for the community and workers within PT SSS.

7.8.2

The certification unit has SOPs related to the management and maintenance of water sources through the SOP document for River Border Management (Riparian) with SOP Number SSS-EST-25 dated November 24, 2017 which was approved by the President Director. This SOP aims to ensure the preservation of the function of water bodies (rivers, reservoirs and swamps) located within the plantation activity location and refers to the applicable laws & regulations. River border management activities are carried out by:

- Determination of the width of the river border area.
 - Determination of river status at the plantation location using hydrological maps (rivers and sub-rivers).
 - Define river border areas based on their status.
 - For those with the status of rivers and sub-rivers, follow the applicable laws and regulations.
 - The width of the border for the artificial reservoir is 10 meters around the reservoir.
- Placing signs on river border lines.
 - Marking the location of new land clearing
 - Land clearing activities may only be carried out at the outermost boundary of the marked river border.
- Marking the location where oil palm has been planted using paint.
- Cultivation activities in river border areas
 - Harvesting of FFB planted in riparian areas can still be carried out.
 - All weeds and saplings are allowed to grow naturally in the river border area and slashing is not permitted.
 - Ensure that chemical weed control is not carried out using herbicides.
 - Application of fertilization should not be done in the rainy season and the arrangement of the palm fronds must be in the form of a U-Shape around the tree.
 - If there are weeds in the river border area, weed control can be carried out using the wiping method.
- Rehabilitation of riparian areas
 - Planting various types of trees that are native to the area or other plants that can immediately cover the soil surface.

The unit of certification can show documents for the management and maintenance of water sources contained in the River Border Management (Riparian) document. From the documents shown, it is known that several activities have been carried out by the management unit to manage water and maintain water sources, including:

- Report on rehabilitation of riparian areas, carried out in river border areas where oil palm has been planted, including; planting and maintenance of local forest plants. Rehabilitation in floodplain areas is a temporary shelter area before water flows into the river. This area is very important to maintain water circulation, for example in freshwater swamps and peat swamps. In peat areas, canals are closed to maintain water levels and prevent fires during the dry season. The progress of planting in the floodplain area until December 2021 has planted 173,175 seedlings consisting of 127 plant species in an area of 250 ha consisting of 73.5 ha in Lada Estate and 164.5 ha in Runtu Estate. The selection of rehabilitation plants has the criteria as native species, has a fast growth rate, suitability to the land or rehabilitation area, is tolerant to sunlight, types that have the potential to produce non-timber forest products (NTFP), plants that have the potential as animal feed sources, and protected or endangered species. Among them; *Mentangur, Durian, Rengas, Ketiau, Rambutan, Nyatoh, Balangeran, Bayur, Mangrove, Meranti*, etc.
- HCV management report, related to monitoring of river border area markings by painting on oil palm trees/outermost forest trees from river border areas and not spraying pesticides on river border areas
- RKL-RPL document, related to periodic reporting of river water quality analysis to relevant agencies every 6 months.
- Land application report documents, as evidence of the record of reuse of liquid waste from factories for land application activities, implementation of efforts to avoid discharge of liquid waste into water bodies.

From the results of field observations at Rangit river and Kumai river Blocks 32, 78, 119, and 120 in Lada Estate, there is maintenance of drainage channels as river boundaries around the plantation block, there is no indication of chemical application, and HCV management is carried out properly. In addition, the certification unit has a prohibition on disposing of domestic waste in river areas. In Runtu Estate, in the Peat area in Block E16 there is management in the HCV area.

7.8.3

The certification unit already has SOPs regarding POME management, which is listed in several procedures, such as:

- SOP for POME Management No. The SOP PROSES-SSS/014/PKS revision 01 was approved by the President Director on July 24, 2008. This procedure explains the process plans, operating procedures, maintenance, sample analysis and reports, emergency conditions, and work equipment.

- SOP for POME Management for Land Application No. The PROCESS-SSS/014A/PKS SOP is approved by the President Director. In the procedure it is explained that the resulting waste is treated first in the WWTP pond before being used. This includes planning (survey, flatbed pool design, research, licensing), implementation (flow and maintenance), monitoring and measurement, and reporting.

For POME, the unit of certification uses it to a Land Application (LA) based on permit *Pemanfaatan Limbah Cair pada Tanah kepada Perkebunan Kelapa Sawit PT Surya Sawit Sejati* through *Dinas Penanaman Modal Terpadu Satu Pintu Kabupaten Kotawaringin Barat* No. 503/103/LH/DPMPTSP.D dated 13 May 2019 valid until 28 March 2024. The certification unit also has a Waste Water Treatment Plant (WWTP) as a form of managing POME before being discharged into land applications. The WWTP consists of a pool consisting of 6 ponds with a total volume of 127,336 m³.

Before being applied to the land, the certification unit conducts a quality test carried out by the Laboratory accredited KAN (LP-966-IDN) using the standard KepMenLH Number 29 of 2003. For example, the results of testing in the period April - June 2022, in accordance with applicable permits and regulatory quality standards, it shows that the company has fulfilled The regulation, such as pH 6-9, and BOD <5000. It can be concluded that the company has complied with the quality standards of waste water that is disposed of and/or utilized according to the quality standards of waste water utilization to be applied to land and does not cause pollution to the environment.

To carry out monitoring on hygiene and sanitation in groundwater around the land application area, the certification unit also conducted tests on monitoring wells in 3 locations according to the quality standard of the *Permenkes RI No.416 Tahun 1990*. Based on the analysis data of monitoring water, none of the parameters tested exceeded the water quality standards utilization waste.

The results of field observations in WWTP ponds and land applications also show that the certification unit has carried out POME management in accordance with its SOPs, there is no indication of runoff of liquid waste into water bodies, and potential pollution. Based on the results of interviews with the Environmental Agency of Kotawaringin Barat, there were no issues related to environmental pollution. Based on this information, it can be concluded that the certification unit has managed POME in accordance with applicable regulations. The quality of the POME that is disposed of, especially BOD (Biochemical Oxygen Demand) is monitored periodically in accordance with applicable regulations.

7.8.4

The certification unit already has a water utilization permit based on *the Izin Pengambilan dan Pemanfaatan Air Permukaan kepada PT Surya Sawit Sejati No.503/0005/IPPAP/DPMPTSP.D* through the Decree of the Head of *Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten Kotawaringin Barat* on October 12, 2021, valid until October 12, 2023. The water source is taken from the reservoir pond on the Sungai Rangit Jaya Village SP 6, Pangkalan Lada District for Palm Oil Mill Processing. The debit quota that can be used is 68,000 m³/month.

The company can also show the results of the recapitulation of water use for the period 1st Semester of 2022. Based on these data, it can be obtained that the average water use for FFB processing is 26,973 m³/month while the total average water usage is 1.16 m³/month. The data shows that the company uses surface water that is in accordance with the quota specified in the permit and a budget that is determined by the company itself.

No	Month	FFB Processed (ton)	Used Treatment Water (m ³)	Budget (m ³)	Average (m ³ /ton)
1	January	23,195.21	28,414	28,284	1.22
2	February	20,551.88	24,043	28,020	1.17
3	March	25,004.47	29,502	28,578	1.18
4	April	23,208.54	27,796	28,452	1.20
5	May	21,550.24	23,072	28,026	1.07
6	June	25,571.78	29,014	29,700	1.13
TOTAL		139,082.12	161,841		1.16

The company can also show proof of payment of the water levy to *Badan Pendapatan Daerah Unit Pelaksana Teknis Pelayanan Pendapatan Daerah Pangkalan Bun*, the payment period is carried out every year. An example of proof of latest payment made, through proof of payment for taking and utilizing surface water in 2021 which was paid on March 2, 2022 with the amount of debit

paid according to the amount of usage debit.

Based on the explanation above, the company already has water usage documents monitored and recorded for the palm oil processing unit along with supporting documents in the form of surface water used permit documents, recapitulation of water used, as well as proof of payment of retribution for surface water used.

Status: Comply

7.9

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

7.9.1

The certification unit utilizes waste to increase the efficiency of the use of fossil fuels and to optimize renewable energy which is monitored and documented at PT Surya Sawit Sejati. This can be proven by recording documents on the implementation of the use of shells and fiber from the rest of the mill production process as renewable fuel for boiler purposes in 2021, for example data for the period January - December 2021, as follows:

Description	Unit	Total
FFB Process	Ton	252,478.390
Shell used	Ton	14,359.18
Fiber used	Ton	32,709.92
EFB used	Ton	59,098.04
Solar for generator	liter	222,129
Total energy from turbine	kWh	6,882,878
Total energy from generator	kWh	709,984

Based on the results of interviews and document verification, it shows that all solid waste such as shells and fiber is used for diesel fuel substitution. All of these wastes are utilized and recorded usage data in detail and traceable. From the data above, it is known that the unit of certification has saved 92% fuel from the use of renewable energy in the form of shells and fiber.

PT SSS has also made efforts to improve the efficiency of the use of fossil fuels in the transportation area (use of vehicles), among others by carrying out regular maintenance to reduce incomplete combustion and analyzing fuel use by selecting efficient transportation routes.

Based on this explanation, it can be concluded that the company has implemented efficient utilization of fossil fuels to optimize renewable energy which is monitored and documented.

Status: Comply

7.10

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

7.10.1

Certification Unit has been conducted source identification and GHG valuation by doing GHG inventory within the scope of Lada Mill and its supplies based (Lada Estate and Runtu Estate) monitored through Palm GHG Calculator 4.0 and the summary result reported and accessible to public in RSPO website. The company has identified the significant GHG emissions, including: land used change, POME processing, used of fertilizers and pesticides, used of fossil fuels for operations and transportation.

Also made several mitigation plans to control the impact among GHG emission, such as: the right dose of fertilizer use and application as recommended, reduction of reuse and recycling actions, restrictions on electricity use, transportation and machine maintenance, and periodic air quality tests.

Reduction of fossil fuels at Lada Mill has been implemented by using fiber and shells. The company also uses POME with test results from the monitoring, showing that all wastewater testing parameters have met the applicable quality standards. Based on the review of documents for example: monitoring of pesticide use, monitoring of diesel fuel, identification of HCVs and others it is found that accurate data have been entered into the RSPO palm oil GHG Calculator. GHG calculation using palm GHG Calculator 4.0. The summary of GHG emissions for the period January - December 2020 and 2021, is listed as follows:

Lada POM - 2020

Summary Emissions

Description	Value	Unit	Description	Value	Unit
CPO	1.59	tCO ₂ e/tProduct	Oil palm planted on mineral soil	8278.04	Ha
PK	1.59	tCO ₂ e/tProduct	Oil palm planted area on peat	801.96	Ha
PKO	0.00	tCO ₂ e/tProduct	Total oil palm planted area	9080.00	Ha
PKE	0.00	tCO ₂ e/tProduct	Conservation area (Forested)	7673.00	Ha
OER	22.02	%	Conservation area (non-Forested)	0.00	Ha
KER	4.50	%	FFB Production per hectare	29.35	t/ha

Mill Emissions and Credits & Emissions from Palm Kernel Crusher

Mill Emissions and Credits			Emissions from Palm Kernel Crusher	
Emission Source and Credits	tCO ₂	tCO ₂ e/t FFB	Emission Source	tCO ₂ e
POME	5848.51	0.02	PK from own mill	0.00
Fuel Consumption	741.87	0.00	PK from other sources	0.00
Grid Electricity Utilization	0.00	0.00	Fuel Consumption	0.00
Export of Excess Electricity to Housing & Grid	-1922.44	-0.01	Total Crusher Emissions	0.00
Sale of PKS	-3179.77	-0.01		
Sale of EFB	0.00	0.00		
Total	1488.17	0.00		

Estate / Plantation Field Emissions and Sinks

Description	Emission (tCO ₂ e)			TOTAL
	Own	Group	3rd Party	
Emission Source				
Land Conversion	89679.79	0.00	0.00	89679.79
CO ₂ Emissions from Fertilizer	68142.06	0.00	0.00	68142.06
N ₂ O Emissions from Peat	6003.28	0.00	0.00	6003.28
N ₂ O Emissions from Fertilizer	10885.86	0.00	0.00	10885.86
Fuel Consumption	1677.31	0.00	0.00	1677.31
Peat Oxidation	43787.01	0.00	0.00	43787.01
Sinks				
Crop Sequestration	-85004.53	0.00	0.00	-85004.53
Sequestration in Conservation Area	-70361.41	0.00	0.00	-70361.41
Total	64809.37	0.00	46278.00	111087.37

Palm Oil Mill Effluent Treatment

POME Treatment	Unit	Value
POME Diverted to Compost	%	0
POME Diverted to anaerobic digestion	%	100
• POME to anaerobic pond	%	0
• POME to methane capture (flaring)	%	100
• POME to methane capture (electricity generation)	%	0

*POME is processed in WWTP and Methane Capture

Lada POM - 2021
Summary Emissions

Description	Value	Unit	Description	Value	Unit
CPO	1.61	tCO ₂ e/tProduct	Oil palm planted on mineral soil	8246.52	Ha
PK	1.61	tCO ₂ e/tProduct	Oil palm planted area on peat	800.48	Ha

PKO	0.00	tCO ₂ e/tProduct	Total oil palm planted area	9047.00	Ha
PKE	0.00	tCO ₂ e/tProduct	Conservation area (Forested)	7673.00	Ha
OER	21.84	%	Conservation area (non-Forested)	0.00	Ha
KER	4.38	%	FFB Production per hectare	27.9135	t/ha

Mill Emissions and Credits & Emissions from Palm Kernel Crusher

Mill Emissions and Credits			Emissions from Palm Kernel Crusher	
Emission Source and Credits	tCO ₂	tCO ₂ e/t FFB	Emission Source	tCO ₂ e
POME	5541.16	0.02	PK from own mill	0.00
Fuel Consumption	815.40	0.00	PK from other sources	0.00
Grid Electricity Utilization	0.00	0.00	Fuel Consumption	0.00
Export of Excess Electricity to Housing & Grid	-1954.71	-0.01	Total Crusher Emissions	0.00
Sale of PKS	-1736.94	-0.01		
Sale of EFB	0.00	0.00		
Total	2664.91	0.01		

Estate / Plantation Field Emissions and Sinks

Description	Emission (tCO ₂ e)			TOTAL
	Own	Group	3rd Party	
Emission Source				
Land Conversion	89350.56	0.00	0.00	89350.56
CO ₂ Emissions from Fertilizer	66066.12	0.00	0.00	66066.12
N ₂ O Emissions from Peat	5992.20	0.00	0.00	5992.20
N ₂ O Emissions from Fertilizer	11467.04	0.00	0.00	11467.04
Fuel Consumption	1880.04	0.00	0.00	1880.04
Peat Oxidation	43706.21	0.00	0.00	43706.21
Sinks				
Crop Sequestration	-84695.60	0.00	0.00	-84695.60
Sequestration in Conservation Area	-70361.41	0.00	0.00	-70361.41
Total	63450.16	0.00	40439.20	103844.36

Palm Oil Mill Effluent Treatment

POME Treatment	Unit	Value
POME Diverted to Compost	%	0
POME Diverted to anaerobic digestion	%	100
• POME to anaerobic pond	%	0
• POME to methane capture (flaring)	%	100
• POME to methane capture (electricity generation)	%	0

*POME is processed in WWTP and Methane Capture

7.10.2

Certification Unit did not carry out new developments above 2014, but the company continued to manage GHG by conducting an inventory of emission sources. They can show identification documents of activities that produce emissions for the period 2020 and 2021 for Mill and Estate. This is made to estimate carbon stocks in the management area along with potential sources of emissions that can occur directly as a result of the management, and plans to minimize these emissions are drawn up and implemented.

The GHG emission reduction mitigation plan developed by the company is the use of renewable fuels in the form of shells, fiber

and EFB as a substitute for diesel, performing maintenance on operational equipment such as boilers on a regular basis, doing reforestation around the factory and residential areas, applying POME to the surrounding LA area, and installation of a biogas plant. Records of GHG mitigation for Estate and Mill units, for example the use of fertilizers in accordance with the dosage, routine maintenance of operational vehicles, socialization of the prohibition of burning waste, applying efficient use of electricity and integrated pest control to minimize the use of pesticides.

Boiler burning activity at Lada POM is not significantly negative impact on air quality. PT. SSS is committed to always monitoring/testing periodically with the installation of Smoke Density, and environmental improvements through air pollution reduction programs such as reforestation programs around factories. The unit of certification also carries out measurements and testing of stationary source emissions carried out on boilers and generator chimneys. Based on the analysis of the value of the test results, it can be concluded that there is no value that is above the applicable quality standard, namely Minister of Environment Regulation Number. 21 of 2008 on Emission Quality Standards for Immovable Source Disturbances.

7.10.3

The certification unit already has SOPs related handling immovable disturbance sources, including;

- SOP for Handling Immovable Disturbance No. SSS/022/PKS/0 dated July 24, 2018 This procedure explains that the leaders of each department identify aspects of the environmental impact of their activities related to disturbance of immovable sources; The EHS officer together with the department head assesses the significance level of the stationary source disturbance; EHS officers and department heads formulate efforts to manage fixed source disturbances; the head of the department ensures that efforts to manage disturbances from immovable sources are running; the head of the department makes a work plan and financing for the procurement of supporting infrastructure for handling disturbances from immovable sources; The EHS officer makes a work plan for monitoring disturbances from stationary sources.
- SOP for Air Pollution, Noise and Odor No. SSS/023/PKS/0 dated July 24, 2018 This procedure describes the identification of sources of air pollution (emissions), noise, vibration and odors in all PT SSS factories; conduct emission testing of boilers and generators every 6 months; conduct ambient air testing in factories, housing, biogas and land applications every 6 months; carry out noise control and testing in the factory environment at least once every 6 months; perform odor control and testing at least every 6 months.

The certification unit has also identified other significant pollutants, as well as plans to reduce or minimize their impacts and has carried out standard technical measurements of the level of disturbance from immovable sources carried out by the Laboratory which has been accredited by KAN, which is contained in the test results document and the RKL-RPL document for Semester 2 of 2021 (July-December). The tests carried out by the company include odor, vibration, and noise testing in work and residential areas, air quality testing for ambient air emissions, boilers and generators. Emission samples were carried out in the factory area, as well as generator operation. Meanwhile, ambient air is taken at the location in front of the factory, biogas plant area and residential areas.

From the result of document review it can be concluded that all test parameters including odor, noise in the work area and housing, air quality testing for ambient air emissions, boilers and generators are in accordance with applicable quality standards and the certification unit has also reported it to the relevant agencies.

The certification unit has several actions to handling of disturbances from immovable sources in accordance with the provisions in the SOP. This has been verified based on document review and field observations, including:

- For high noise areas, it is required to use PPE in the form of masks, ear plugs and ear muffs provided at each station location.
- Use masks for directly affected employees such as operators and drivers
- Planting and maintenance of wide-canopied plants in green lanes and road borders and around factories
- Tests for immovable sources disturbances such as noise, odor, ambient air emissions, boilers and generators every 6 months are carried out by an accredited laboratory and reported regularly to the relevant agencies.
- Conduct regular health checks for employees working in areas with high noise risk.
- Ensure boiler fuel (fiber and shell) is dry to reduce emissions in boiler combustion.

From the results of observations in the Lada POM area, workers use appropriate PPE, and the equipment and processing stations are functioning properly.

	Status: Comply	
7.11 Fire is not used for preparing land and is prevented in the managed area.		
<p>7.11.1 Based on the results of the verification of legality documents and area statements, interviews with management and related stakeholders and the results of observations in the company's operational areas, it was found that there were no new plantings or replanting areas. The oldest planting year is 18 years old (planting year 2004).</p> <p>7.11.2; 7.11.3 The company has conducted land fire prevention plan, for example:</p> <ul style="list-style-type: none"> • Socialization of fire prevention and control • Fire management training and simulation • Formation of emergency response team in each Estate • Conduct training with the local community • etc <p>The company can also show a list of facilities and infrastructure owned by referring to the standardization of equipment in Ministry of Agriculture 05 of 2018. The results of field observations at the Fire Department Warehouse show that all facilities and infrastructure are in good condition and well maintained. The results of the firefighting simulation activities also went well and the tools used were able to function optimally.</p> <p>The company already has an emergency response structure which capable of preventing and dealing with land fires. An emergency response structure has been established in each estate. The company can provide fire training for emergency response structures that are carried out regularly, for example:</p> <ul style="list-style-type: none"> • Records of training on May 27 2022 by members of the Runtu Estate emergency response team • Recorded fire drill training on June 30, 2022 held at Lada POM attended by 36 participants <p>The company has also conducted training with the surrounding community for the prevention and control of land fires shown in the Minutes of meeting on November 14, 2019 which was attended by 60 participants from surrounding villages.</p> <p>The results of interviews with the Kotawaringin Barat Plantation Office, obtained information that the company already has adequate fire control facilities and infrastructure and has referred to the legislation. The company also routinely reports the results of forest and land fire management. In addition, the results of interviews with relevant agencies, local communities and internal stakeholders, have never occurred land fires in PT SSS.</p>		
	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.		
<p>7.12.1; 7.12.8 The unit of certification conducts land clearing without prior HCV assessment. However, it has been preceded by an AMDAL study in 2007. From the document review of the area statement analysis, it shows that the company carried out the planting in 2007-2009 and the HCV study in 2014. In this regard, the company has a LUCA obligation.</p> <p>The LUC Analysis study was conducted by Rodziah binti Hashim on May 9, 2014. The study area is 18,743.74 for 4 estates, while the scope of certification is only 6.717.62 ha. From the results of the study, it was found that raw liability covering an area of 10,699.5 ha, and final conservation liability 2,508.76 ha, the document has been verified by Dr. Ismail Parlan with pass status. The analytical method for LUCA is image analysis and AMDAL conducted by Green Harvest Environmental Sdn Berhad (Kumai Estate, Lada Estate and Runtu Estate).</p> <p>There is email from khing.suli@rspo.org dated on October, 4th 20 that informing "I would like to inform you that the Compensation Panel has reviewed the clarification provided by your good self and Dr Carl Traeholt, and I am pleased to convey that the</p>		

Compensation Plan is approved by the Compensation Panel, but with follow up action points”.

The company has shown supporting documents consist of:

1. Annex 7 Compensation Concept Note on Population Management of the endangered species.
Following the RSPO regulation and guidance, UP/PTSSS submitted a self-declaration liability and the final conservation liability amounted to an area measuring 2,508.76 ha. According to the RSPO compensation guidelines, compensation can be meted out in various ways, amongst these;
 - Area based compensation in Indonesia@ buy land and maintain for ≥25years
 - Monetary equivalent compensation to external conservation organization
 - Internal conservation actions that meets the “additionally” criteria
2. Annex 8 Compensation Plan
 - Lada Estate.
 - Rehab Riparian (remediation) 74.46 ha.
 - Rehab Floodplain 50.8 ha.
 - Non-oil Palm Plantings on steep slope.
 - Rantau Estate
 - Rehabilitation Riparian (remediation) 15.59 ha.
 - Rehab Floodplain (Freshwater swamp 133.2 ha dan peat swamp 205.3 ha).
 - No oil palm plantings on steep slope.
3. 25 years’ budget and timeline.
4. Clarification needed for compensation plan final on 27 September 2019.
5. RaCP Quarter Report Period April-June 2022; Orangutan research as an action point of the remediation and compensation program carried out by PT SSS, including by:
 - Socialization orangutan survey plan with the village leader and their staff in the villages in corridor forest that adjacent to the PT.SSS Company with KW II BKSDA Kalimantan Tengah
 - Socialization to the all workers of estate in PT. Surya Sawit Sejati regarding Orangutan research and conservation program.
 - Investigate orangutan presence by using camera trap
 - Orangutan survey in the forest corridor together with BKSDA Kalimantan Tengah, KPHP Kotawaringin Barat, and OFUK-Indonesia.
 - Building communication with BKSDA Kalimantan Tengah and Head of Deputy KKH regarding biodiversity conservation and managing forest corridor that connect between conservation area PT.SSS and Tanjung Puting National Park as wildlife habitat.
 - Rescued female orangutan and her baby in plasma palm oil plantations, Medangsari Arut Estate, PT. Surya Sawit Sejati.

Based on these results, it was concluded that the company had conducted a LUC Analysis with the results of an obligation remediation and compensation plan (RaCP).

7.12.2

Unit of certification has identified the protected area of PT Surya Sawit Sejati which is located in Kotawaringin Barat Regency, Kalimantan Tengah Province. The HCV Assessment conducted in 9 May 2014, made by the biodiversity internal team, created a work program to complete the results of the HCV identification in 2008, by delineating the HCV area, a baseline study and also conducting liability disclosures to the RSPO regarding the program for remediation and compensation.

The study was conducted by the Biodiversity Division of PT SSS. From the results of the study, the identification of protected areas was obtained according to the audit scope data (total 6,717.62 ha) with the following details;

Area	Lada Estate (ha)	Runtu Estate (ha)
HCV-Riparian	122.56	2.28
HCV-Cemetery Area	0.03	-
Conservation area (self declared)	682.93	1143.85
Conservation area- rehabilitation (self declared)	31.32	604.69
Sub Total	836.84	1,750.82
Grand Total	2,587.66 ha	

Based on the results of the document review and interview with management, it was found that there was no new clearing at PT SSS since 15 November 2018, so HCS is not applicable. So it can be concluded that the company already has documents identified as protected areas and high conservation value areas.

7.12.3

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

7.12.4

Unit of certification also has an HCV Management plan and protected areas in accordance with the PT Surya Sawit Sejati HCV Management Plan 2021-2025, there are;

- Biodiversity database
- Monitoring of biotic and abiotic parameters, through measurement of water quality and micro-climate
- Arrangement and rehabilitation of native tree species nurseries by developing nurseries (structure, seed sources, and management)
- Area enrichment and protection,
 - Boundary management (delimitation, patrolling, and monitoring of intrusive invasive species)
 - Rehabilitation and enrichment of wildlife habitat
 - Build and enrich potential
 - Control of hunting and illegal activities
 - Fire monitoring
 - Peat monitoring; erosion stake monitoring
- Public's awareness
 - Community outreach and involvement
 - Encouraging communities to utilize non-timber forest (NTFP) products in conservation areas
 - Protect the preservation of historical - cultural sites with relevant stakeholders

Management plan has been developed with participatory manner through stakeholder meeting held every once year. The last stakeholder meeting held in 20 July 2022.

7.12.5

Based on interviews with surrounding communities and maps of HCV areas, area local communities do not overlap with the company's HCV areas.

7.12.6

Unit of certification has procedures for the preservation of biodiversity, contained in the document;

- SOP for Inventory of Flora with No. SSS-EST-17 dated October 26, 2013 as a reference for the introduction of flora species in the area of PT Surya Sawit Sejati – United Plantations
- SOP for Fauna Identification with No. SSS-EST-18 dated October 26, 2013 as a reference for identifying animals in the PT Surya Sawit Sejati – United Plantations area
- SOP for Protection of Flora and Fauna with No. SSS-EST-25 dated January 20, 2011 as a guide to prevent plant and animal species from being endangered, maintain genetic purity and diversity of plant and animal species, and maintain ecosystem balance and stability.
- SOP for Patrol and Work Safety in Conservation Areas with No. SSS-EST-24 dated January 20, 2011 as a guide in maintaining and conserving conservation forests, especially habitats for endangered animals, noting encounters with flora and fauna in conservation forests, and identifying disturbances that threaten the habitats of endangered animals.

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

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

- Minutes of socialization of Lada Estate, Division I on 17 June 2022,
- Minutes of socialization to employees of Lada Estate Division II on September 8, 2022
- Minutes of socialization to Runtu Estate employees on April 10, 2021
- Minutes of socialization to employees of Runtu Estate South Div on April 9, 2021

Based on the results of interviews with representatives of the village community, it is known that the community understands the existence of the HCV area and the presence of flora and fauna in the company area. The village community understands that the company protects the HCV area also for flora & fauna, and is aware of the protected fauna species, prohibitions on hunting, logging and burning forests. Respondents added that in addition to direct socialization, the company also installed warning boards or signboards marking HCV areas as well as prohibitions on environmental destruction which were an indirect form of socialization. Based on this explanation, it can be concluded that the company already has a plan and evidence of the implementation of socialization and is known by the surrounding community.

7.12.7

The certification unit also has a flora and fauna monitoring program that is scheduled every year to update data on flora and fauna found in the company area. Based on the monitoring report on the diversity of flora and fauna of PT Surya Sawit Sejati, the results of the identification of flora and fauna within the company's area in 2021 include:

- Flora: Consisting of 322 types, Rotan (*Calamus sp.*), Laban (*Vitex pubescens*), Besahang (*Magnolia borneensis*), Gaharu (*Aquilaria malaccensis Lamk.*), dan Nyatoh (*Payena leerii*)
- Fauna: Consisting of; 25 amphibian, 40 reptils 9 turtles, 7 lizards, 22 small mammals, 34 big mammals, 15 rats, 123 fishes, and 208 aves (43 of them are protected). Some examples protected by Permen LHK No. P.106/MENLHK/SETJEN/KUM.1/12/2018, there are; *Accipiter trivigatus*, *Alcedo meninting*, *Lonchura atricapilla*, *Pitta Sordid*, *Strix leptogrammica*, *Orilitia borneensis*, *Crocodylus porosus*, and *Malaya false gharial*.

The certification unit has a report on the results of monitoring flora and fauna in the conservation area of PT Surya Sawit Sejati in 2021 which is reported to BKSDA SKW II of Kotawaringin Barat Regency in Pangkalan Bun, Kalimantan Tengah BKSDA, Kotawaringin Barat KPHP, and Head of Kalimantan Tengah Forestry Service on 22 July 2022 with No. 156/HRD/EKS/UP-SSS/VII/2022

PT SSS has a map showing protected areas / areas with high conservation value within the company's operational areas according to the scope of the assessment in a scale of 1:70,000. The map shows protected areas such as riparian and rehabilitated forest areas. The source of the map comes from the BIOD UO-PT SSS 2021 Basemap Geodatabase, and is equipped with a map legend in the form of the boundaries of the scope of the certification area, conservation area, and embedded area.

From the results of observations in the field of conservation areas at Riparian Blocks 32, 78, 119, and 120 as well as Mangrove Forest HCVs Block 43, it was found that there is a spray area boundary in the form of a ditch, there is no indication of chemical application, there is an information board on the conservation area. From the results of interviews with workers and the community in housing, they understand and have a commitment to maintaining protected areas and protected flora and fauna, by not hunting, illegal logging, and other activities that have the potential to cause environmental pollution.

The results of HCV monitoring in 2021 are carried out in accordance with the master plan and annual planning evaluated by management and involving relevant stakeholders.

Status: Comply

3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or √
ASA-4	PT Surya Sawit Sejati Subsidiary of United Plantations Berhad do not use RSPO trademark and CB Logo. United Plantations Berhad Trademark License Number RSPO-1-0004-04-100-00.	√
	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-4	PT Surya Sawit Sejati Subsidiary of United Plantations Berhad do not use RSPO trademark and CB Logo. United Plantations Berhad Trademark License Number RSPO-1-0004-04-100-00.	√
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or √
ASA-4	PT Surya Sawit Sejati Subsidiary of United Plantations Berhad do not use RSPO trademark and CB Logo. United Plantations Berhad Trademark License Number RSPO-1-0004-04-100-00.	√
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or √
ASA-4	PT Surya Sawit Sejati Subsidiary of United Plantations Berhad do not use RSPO trademark and CB Logo. United Plantations Berhad Trademark License Number RSPO-1-0004-04-100-00.	√
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of United Plantations Berhad. against the rules for partial certification was determined through external assessment conducted by RSPO Accredited Certification Body in accordance with RSPO Certification System clause 4.2.4. A summary of findings is as stated below.

United Plantations Berhad Time Bound Plan (TBP) is explained in point 1.10. United Plantations Berhad has informed the TBP progress, MUTU has considered that United Plantations Berhad is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by United Plantations Berhad on 2021.

MUTU has verified partial certification for un-certified unit's subsidiary of United Plantations Berhad based on their Time Bound Plan. There is one (1) uncertified mills and four (4) uncertified estates of United Plantations Berhad. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Yes and positive assurance is produced for these units.</p> <p>PT. Surya Sawit Sejati has conducted annual RSPO internal audits from 16-21 March 2020 inclusive of plasma smallholders in PTSSS. The positive assurance statement was made in the internal audit report: The management units under PTSSS have been audited against RSPO P&Cs and the operations are complied with the national legislation and recommend undergoing external audits upon addressing the above findings.</p> <p>United Plantations Berhad have also conducted annual RSPO internal audits for Tanarata Estate on 10th July 2020. The positive assurance statement was made in the internal audit report: The sustainability team has conducted RSPO internal audits and the operations are complied with the national legislation and the upgrading of workers quarters and infrastructures are in progress. United Plantations Berhad has conducted periodic internal audits to ensure legal compliance and other time bound criteria for uncertified management units.</p>
2.1.2	<p>No replacement after dates defined in Nis Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). 	<p>United Plantations Berhad has submitted liability disclosure to RSPO.</p> <p>All three certification units of Ulu Bernam POM, Ulu Basir POM, Jendarata POM and UIE POM have no liability.</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
	<ul style="list-style-type: none"> Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>For Lada POM: The company has identified HCV area for Lada Estate and Runtu Estate in 2008. However, the identification result is not considered sufficient by the company since there is no information on the hectare of HCV area and the location of the identified HCV. Therefore, the company re-identify the HCV area and delineate the HCV area based on HCV identification 2006. The delineation is conducted by Biodiversity Team of the company. Based on the delineation of HCV area there is HCV area that is opened by the company. The company has sent the disclosure of liability and currently has entered to the third stage of RACP process.</p> <p>In 2014, the company has also conducted HCV identification for smallholder scheme area and Kumai Arut Conservation Area for the area of 1,121.2 ha. However, the area of 49.572 ha is highly potential be opened as housing area of Benaning Bawah Villagers. The information is based on community aspiration to exclude the area from HCV area of Kumai Arut Estate Scheme Smallholder. The company with assigned consultant has approached and counselled local community through FPIC method. The company has consulted to RSPO Jakarta Office on 9 May 2016 in accordance with this situation for RSPO to accommodate community aspiration without disobey RSPO requirement on new area development. This communication shall be followed up and updated</p> <p>There is no new replacement of forest in plasma smallholders in PT SSS and Tanarata Estate.</p> <p>Auditor verification Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>There is no new planting/ land clearing in plasma smallholders in PT SSS and Tanarata Estate after 1st January 2010.</p> <p>Auditor verification United Plantations Berhad has sent their LUCA and process their RACP liability. There is no liability applied for units in Malaysia.</p> <p>However, there is liability applied for Lada POM – PT Surya Sawit Sejati, certification unit is located in Kalimantan Tengah Province, Indonesia. The company has showed evidence on RACP process for the unit. At</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		current, the compensation process has been sent to RSPO Secretariat but no approval yet.
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>There is no any land conflicts reported in both plasma smallholders in PT SSS and Tanarata Estate. Besides, the company has conducted periodic internal audits to ensure legal compliance and other time bound criteria for uncertified management units. The company has developed a complaint and grievance mechanism regulated in stakeholder communication and consultation (SOP-HRD-07-R00) and land conflict procedure (SOP : SSS-COMDEV(HMS)-024). The mechanism regulated the flow chart process. It is equipped with complaint form</p> <p>Auditor verification</p> <p>The SEIA document of the company has identified legal, customary and user right that is presented in the information of the surrounding community. The company has also the SOP to identify legal, customary and user rights that is provided in SOP Land Compensation No. HRD-015-R00 dated 1 January 2016. The community is involved in identifying the land claimed and in the compensation process including the amount of the compensation is negotiated. The company also provides mechanism that has been socialized to the surrounding the community through three monthly meeting between the company and the community. Further, the record of any claim and the compensation process is filed by the company. The record of the compensation process is provided to the claimant and can be access through stakeholder information request regulated in procedure of information request by internal and external party No. SOP-HRD-05-R00.</p> <p>Based on public consultation with the surrounding community, they has understood the mechanism if there is a claim and the PIC of the company to be contacted. They also inform that the claimant has been informed first on the compensation amount offered by the company but they still can negotiated and can say no to refuse the offered compensation if they did not agree. The final result of the negotiation on compensation process is informed to them.</p>
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>No major issues reported. Any non-compliance will be addressed through internal audits consistent with the requirements of RSPO P&C criteria.</p> <p>Auditor verification</p> <p>There is no information from public source and RSPO</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>The company has a complaint and grievance mechanism regulated in stakeholder communication and consultation (SOP-HRD-07-R00) and land conflict procedure (SOP : SSS-COMDEV(HMS)-024). The mechanism regulated the flow chart process. It is equipped with complaint form</p> <p>The procedure has been socialized to employee in morning briefing and SOP day. And the socialization to the surrounding community is given through three monthly meeting. The documentation of incoming complaint and grievance is documented by the company including the response by the company. The documentation of the complaint process is documented and the response is informed to the complainant. This documentation is managed by Human Resource Department. It can be accessed by stakeholder through information request mechanism.</p>
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Yes, there is process for land legality.</p> <p>Auditor verification PT Surya Sawit Sejati SSS have complete list of legal requirement that related to RSPO P&C. The copy of the document available in the office during the assessment conducted and sighted by the auditor.</p> <p>Personnel in charge to manage the legal documentation system are Legal Department.</p> <p>A system used for tracking any changes in laws and regulations was set-up trough procedure No: SOP-HRD-017-R00. SSS has conducted internal audit for legal compliance and explained the process for evaluate the compliance of regulation.</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-2 & ASA-3 (Onsite Audit)

NCR No. :		Issued by :	
Date Issued :		Time Limit :	
NC Grade :		Date of Closing :	
Standard Ref. & Requirement :			
Evidence observed (filled by auditor) :			
DURING ASA 2 & ASA-3, THERE WERE NO FOUND OF NON-CONFORMITIES AGAINST TO ALL RSPO P&C STANDARD.			
Non-Conformance Description (filled by auditor):			
Root Cause Analysis (filled by organization audited):			
Correction (filled by organization audited):			
Corrective Action (filled by organization audited):			
Assessor Evaluation and Conclusion (filled by auditor):			
Verified by :			

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-4

NCR No. :		Issued by :	
Date Issued :		Time Limit :	
NC Grade :		Date of Closing :	
Standard Ref. & Requirement :			
Evidence observed (filled by auditor) : DURING ASA-4, THERE WERE NO FOUND OF NON-CONFORMITIES AGAINST TO ALL RSPO P&C STANDARD.			
Non-Conformance Description (filled by auditor): 			
Root Cause Analysis (filled by organization audited): 			
Correction (filled by organization audited): 			
Corrective Action (filled by organization audited): 			
Assessor Evaluation and Conclusion (filled by auditor): 			
Verified by :			

3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	3.6.1	<p>The management unit has carried out a Special Health Checkup for Workers Lada POM, Lada Estate & Runtu Estate which was carried out in December 2021. Meanwhile, periodic health checks for all employees are planned for August 2022 (Runtu Estate), September 2022 (Lada Estate) and October 2022 (Lada POM).</p> <p>The management unit has the opportunity to ensure that the Periodic Health Examination for all workers is carried out according to the predetermined plan and ensures that the periodic Health examination is carried out periodically.</p>

3.4.4. Noteworthy Positive Components

No	Description
1	The company commitment to implement the principles of sustainable palm oil management.
2	Personal competence in their respective fields.
3	Already have Methane Capture
4	Management commitment in carrying out activities for Conservation, Restoration, and Protection of Wildlife.



3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Department of Food, Horticulture and Plantation</p> <ul style="list-style-type: none"> • The results of the latest Plantation Business Assessment have not yet been released. However, from the results of the provisional/draft assessment, the company got class 1 results (very good) • There are no operational interruptions • The company has submitted mandatory reports on a regular basis • No overlap with mining or forest area • The company already has adequate fire facilities and infrastructure. The team from the plantation office has often made direct visits to the company to carry out monitoring. • There are no land fires in the operational area of PT SSS 	<p>There are no issues that need further verification.</p>
<p>National Land Agency</p> <ul style="list-style-type: none"> • Company already has HGU • There is no expansion or addition of HGU area • Reports on land use are routinely submitted • There are no reports of land disputes from the community • There is no indication of abandoned land • There is no overlap with forest area 	<p>There are no issues that need further verification.</p>
<p>Runtu Village (Village Head and Head of Affairs)</p> <ul style="list-style-type: none"> • One of the positive impacts is an increase in the community's economy (jobs).\ • If there are job vacancies, the company will inform the village. • CSR assistance has been provided according to community needs, one of which is village treasury land. • No environmental pollution issues • No land fires in the company • There is a land dispute. There have been frequent meetings, but there has been no resolution/agreement • The company has provided socialization related to company procedures and policies • The company has conducted joint training on fire management in 2022 • One of the previous land owners. From the results of the interview, it is known that there is no coercion in terms of land compensation. • No overlapping Forest area 	<p>The audit team has verified the legality and land disputes. The settlements related to disputes or land claims have been explained further in criterion 4.8</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Rangit Jaya Village (Village Head)</p> <ul style="list-style-type: none"> • The company has provided CSR such as for road repairs and others. • The parents of the village head were one of the previous land owners. There were no complaints related to the land compensation process. • There is no environmental pollution issue • No land fires in the last 2 years. • There are no land disputes/conflicts. 	<p>There are no issues that need further verification.</p>
<p>Pangkalan Durin Village (Community leader)</p> <ul style="list-style-type: none"> • If there are job vacancies, the company will inform the village. • The company has provided CSR such as for road repairs, assistance for school children, houses of worship and others. • There is no environmental pollution issue • No land fires in the last 3 years. • There are no land disputes/conflicts. • No overlapping Forest area • There has never been an animal attack • The company has provided socialization related to company procedures and policies • The company has provided socialization regarding the prohibition of hunting or destroying conservation areas 	<p>There are no issues that need further verification.</p>
<p>CPO/PK Transport Contractor</p> <ul style="list-style-type: none"> • Have been working together since 2016 • The company has provided socialization related to policies, work procedures and others • There are no complaints to the company • All work execution and payments have been in accordance with the agreement 	<p>There are no issues that need further verification.</p>
<p>Plasma Cooperative</p> <ul style="list-style-type: none"> • Cooperative management is carried out in full management by the company • Plasma area already has SHM • There are no complaints regarding implementation and payment 	<p>There are no issues that need further verification.</p>
<p>FFB supplier (Outside party)</p> <ul style="list-style-type: none"> • The company has provided socialization regarding harvesting mechanisms that meet the criteria • There are no complaints related to implementation and 	<p>There are no issues that need further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>payment. Everything is in accordance with the agreement.</p> <ul style="list-style-type: none"> The price of FFB is determined by the company based on the agreement of both parties. 	
<p>SPSI (Chairman)</p> <ul style="list-style-type: none"> The chairman of SPSI has only served for a few months because the previous management resigned. There are no serious or fatal work accidents Employment implementation has been going well Wages using Kotawaringin Barat Minimum Wage 2022 There are no unresolved labor issues. No intervention in the formation and appointment of labor unions. PPE is provided free of charge. If any PPE is damaged, it will be replaced with a note that the damaged item/PPE is brought/shown. Housing facilities are quite good Periodic inspections have been carried out every year. There is no wage scale in the company 	<p>The audit team has verified related to employment and OHS and has been explained in the related indicators.</p> <p>Regarding the wage scale, the company has a wage scale structure based on letter no. 003/SK/SSS-Direksi/XII/2020 dated December 1, 2020. The results of the verification of the wages of workers, for example, workers with the initials KA and NH, it is known that the company already has a wage scale structure.</p>
<p>Gender Committee</p> <ul style="list-style-type: none"> The activities of the Gender Committee include socializing sexual harassment, complaints and so on. There are no issues/problems related to sexual harassment. Female workers are entitled to menstruation leave (H1) and maternity leave (H2). The company has given permission to breastfeed for new mothers 	<p>There are no issues that need further verification.</p>
<p>Employee Cooperative</p> <ul style="list-style-type: none"> The company has provided support for employee cooperatives in the form of building loans, etc. Cooperatives are engaged in providing basic necessities The 2020 Annual Membership Meeting has been held. Meanwhile, the 2021 Annual Membership Meeting is planned to be held in September 2022. 	<p>There are no issues that need further verification.</p>
<p>Environmental Agency</p> <ul style="list-style-type: none"> The company already has environmental documents that are in accordance with the provisions. Reports on the implementation of environmental management and monitoring plans have been routinely reported by the company. The report is reported every semester. 	<p>There are no negative issues from the Kotabaru District Environmental Service</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> • The contents of the environmental management and monitoring report carried out by the company are in accordance with KepmenLH No. 45. • The company already has a permit for temporary storage of hazardous and toxic waste that has complied with the provisions and the permit is still valid. • Reports on the management of hazardous waste on a regular basis have been reported by the company on a quarterly basis. • The company is currently processing the technical approval of the LA permit and has sent a technical review to the Environment Agency. • The company has reported routine liquid waste monitoring reports. • So far, no environmental pollution issues have been carried out by the company. • So far, there has been no issue of land fires in the company's area. • The positive one from SSS is company commitment to conservation. 	

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 style="text-align: center;"> <p>United Plantations Berhad Management Representative</p>  <p><u>Lee Kian Wei</u> Friday, 19 August 2022</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Rizliani Aprianita Hasibuan</u> Friday, 19 August 2022</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Department of Food, Horticulture and Plantation	Kotawaringin Barat	-	By phone	2 August 2022	✓	
2	National Land Agency	Kotawaringin Barat	-	By phone	2 August 2022	✓	
3	Runtu Village (Village Head and Head of Affairs)	Kotawaringin Barat	-	By phone	2 August 2022	✓	
4	Rangit Jaya Village (Village Head)	Kotawaringin Barat	-	By phone	2 August 2022	✓	
5	Pangkalan Durin Village (Community leader)	Kotawaringin Barat	-	By phone	2 August 2022	✓	
6	CPO/PK Transport Contractor	Kotawaringin Barat	-	Interview	2 August 2022	✓	
7	Plasma Cooperative	Kotawaringin Barat	-	Interview	2 August 2022	✓	
8	FFB supplier (Outside party)	Kotawaringin Barat	-	Interview	2 August 2022	✓	
9	SPSI (Chairman)	Kotawaringin Barat	-	Interview	2 August 2022	✓	
10	Gender Committee	Kotawaringin Barat	-	Interview	2 August 2022	✓	
11	Employee Cooperative	Kotawaringin Barat	-	Interview	2 August 2022	✓	
12	Walhi	Indonesia	informasi@walhi.or.id	Email	20 July 2022		✓
13	Sawit Watch	Indonesia	info@sawitwatch.or.id	Email	20 July 2022		✓
14	AMAN	Indonesia	rumahaman@aman.or.id	Email	20 July 2022		✓
15	WWF	Indonesia	wwf-indonesia@wwf.or.id	Email	20 July 2022		✓
16	Lada POM: 12 workers	Kotawaringin Barat	-	Interview	1 August 2022	✓	
17	Lada Estate: 14 workers	Kotawaringin Barat	-	Interview	2 August 2022	✓	
18	Runtu Estate: 9 workers	Kotawaringin Barat	-	Interview	3 August 2022	✓	
19	Environmental Agency	Kotawaringin Barat	-	By phone	1 August 2022	✓	

DATE	1-5 August 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	<p>Continue consultation with stakeholders by Phone (if needed)</p> <ul style="list-style-type: none"> Public consultation to Government Agencies of Kotawaringin Barat by phone Stakeholder consultation to affected communities surrounding the plantations and previous land owner. Public consultation with Local Contractor & Supplier Interview with internal stakeholders (ex. Bipartite or Labour Union, Gender Committee and Cooperative committee members) <p>Document Verification</p> <ul style="list-style-type: none"> Verification of stakeholder consultation result Document review and completing audit checklist. 	All Auditor
16.30 – 17.00	Submission of Audit Progress	All Auditor
Wednesday, 3 August 2022		
08.00 – 12.00	<p>Field Observation to Runtu Estate</p> <p>Aspect to be verified:</p> <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Environmental and Conservation/HCV management. Implementation of Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Clinic and Waste Management). Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Occupational Health & Safety Aspect 	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	<p>Document Verification</p> <ul style="list-style-type: none"> Verification of stakeholder consultation result Document review and completing audit checklist. 	All Auditor
16.30 – 17.00	Submission of Audit Progress	All Auditor
Thursday, 4 August 2022		
08.00 – 12.00	<p>Document Verification</p> <ul style="list-style-type: none"> Verification of stakeholder consultation result Document review and completing audit checklist. 	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	<p>Document Verification</p> <ul style="list-style-type: none"> Verification of stakeholder consultation result Document review and completing audit checklist. 	All Auditor
16.30 – 17.00	Submission of Audit Progress	All Auditor
Friday, 5 August 2022		
08.00 – 09.00	Interim Meeting	All Auditor
09.00 – 11.00	Closing Meeting	All Auditor
11.00 – 13.00	PT SSS – Pangkalan Bun	All Auditor
14.30 – 15.45	Pangkalan Bun – Jakarta (IN 191)	All Auditor