

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

**[✓] Surveillance**

Name of Management Organisation : **Kijang Palm Oil Mill, PT Buana Wiralestari Mas subsidiary of Golden Agri Resources Holdings Ltd.**

Plantation Name : PT Buana Wiralestari Mas: Kijang Mas Estate; Kijang Kencana Plasma

Location : Village of Sekijang, Sub District of Tapung Hilir, Kampar District, Province of Riau, Indonesia

Certificate Code : **MUTU-RSPO/013**

Date of Initial Registration : 17 January 2017

Date of Certificate Issue : 15 April 2022      Date of Certificate Issue : 31 January 2023

Date of Certificate Expiry : 16 January 2027      Date of Certificate Expiry : 16 January 2024

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-2.1	28 November, 2, 3, 7 & 8 December 2022	Briyogi Shadiwa (Lead Auditor), Erika Lucitawati, Firda Tarunajaya and Sabiah Dhiningtyas Utami	Ardiansyah	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-2.1	05 January 2023

PT Mutuagung Lestari • Raya Bogor Km 33,5 Number 19 • Cimanggis • Depok 16953 • Indonesia  
Telephone (+62) (21) 8740202 • Fax (+62) (21) 87740745/6 • Email: [agri@mutucertification.com](mailto:agri@mutucertification.com) • [www.mutucertification.com](http://www.mutucertification.com)  
MUTU Certification • Accredited by Accreditation Services International  
on March 12<sup>th</sup>, 2014 with registration number *ASI-ACC-055*

**TABLE OF CONTENT**
**FIGURE**

Figure 1. Location Map of PT Buana Wiralestari Mas (Kijang POM) 1

Figure 2. Operational Map of PT Buana Wiralestari Mas (Kijang POM) 2

Abbreviations Used 3

**1.0 SCOPE of the CERTIFICATION ASSESSMENT**

1.1 Assessment Standard Used 4

1.2 Organisation Information 4

1.3 Type of Assessment 4

1.4 Location of Mill and Plantations 4

1.5 Description of Area Statement 6

1.6 Planting Year and Cycle 6

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 19

2.2 Assessment Methodology, Assessment Process and Locations of Assessment 19

2.3 Stakeholder Consultation and Stakeholders Contacted 21

2.4 Determining Next Assessment 22

**3.0 ASSESSMENT FINDINGS**

3.1 Summary of Assessment Report of the RSPO Certification 23

3.2 Conformity Checklist of Certificate and Logo Use 81

3.3 Summary of RSPO Partial Certification 82

3.4 Identification of Findings, Corrective Actions, Observations, Opportunity for Improvement and Noteworthy Positive Components 103

3.5 Summary of Arising Issues from Public and Auditor Responses 104

**4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY**

4.1 Formal Signing of Assessment Findings 106

**APPENDICES**

1. List of Stakeholders Contacted in the RSPO Certification Process 107

2. Assessment Program 109

Figure 1. Location Map of PT Buana WiraLestari Mas (Kijang POM)

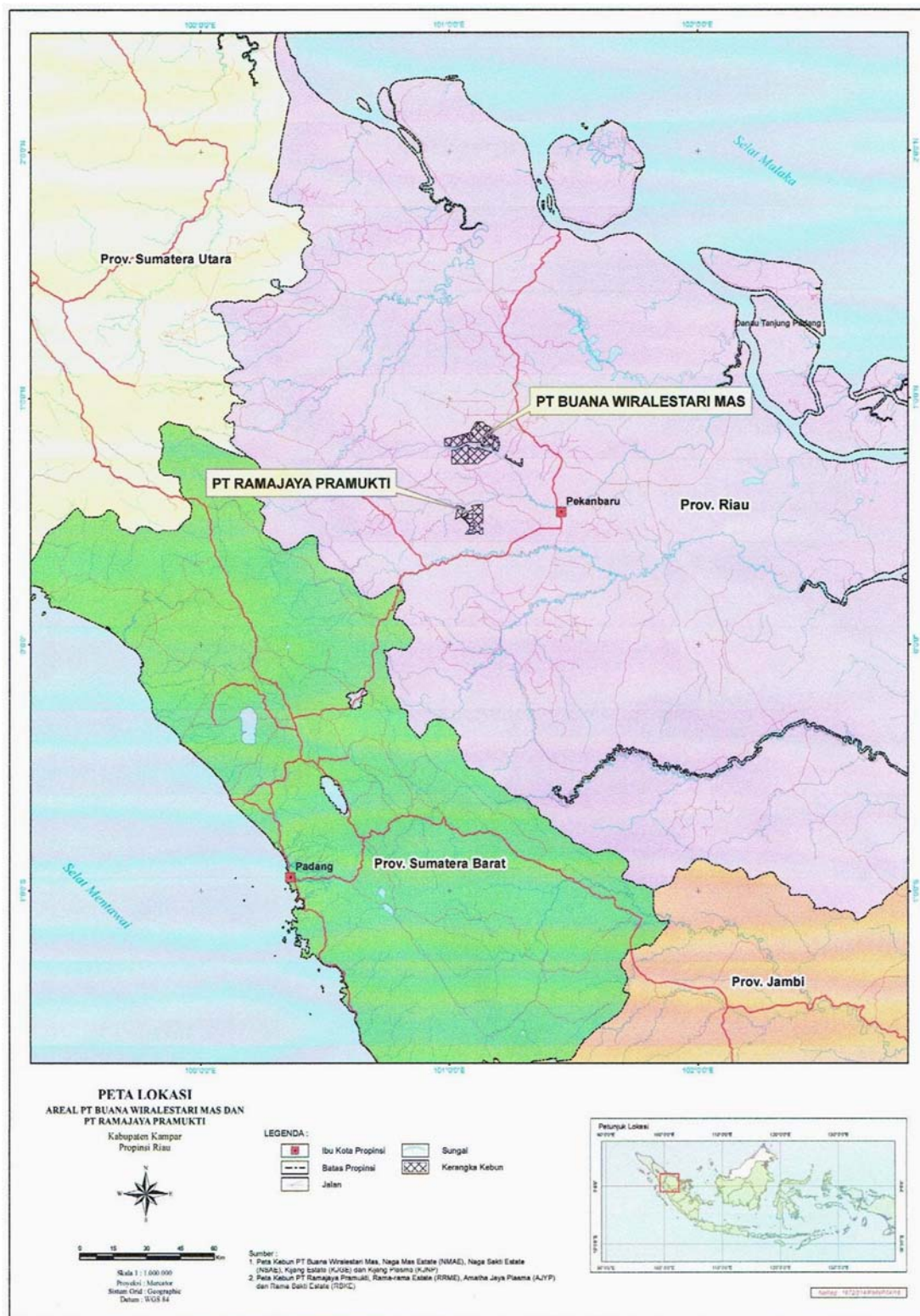
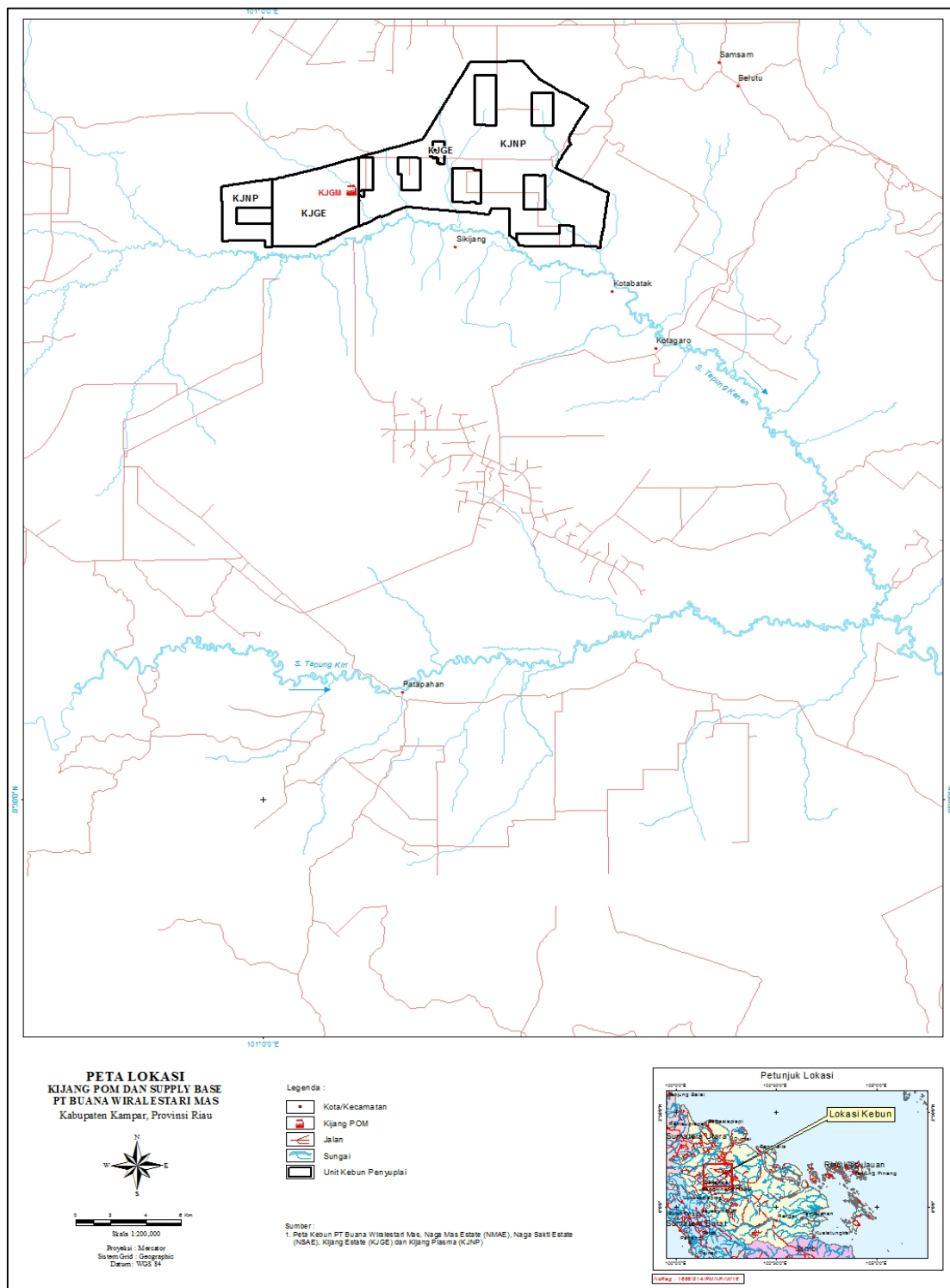


Figure 2. Operational Map of PT Buana Wiralestari Mas (Kijang POM)



## Abbreviations Used

ASA	:	Annual Surveillance Assessment
BKS-PPS	:	<i>Badan Kerjasama Perusahaan Perkebunan Sumatera</i>
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i>
CB	:	Certification Body
CEO	:	<i>Chief Executive Officer</i>
CFO	:	<i>Chief Financial Officer</i>
CH	:	<i>Certification Holder</i>
CLA	:	<i>Collective Labour Agreement</i>
CM	:	<i>Calopogonium Mucunoides</i>
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Community Social Responsibility
CU	:	Certification Unit
FFB	:	Fresh Fruit Bunch
FPIC	:	Free, Prior, Informed, Consent
FSP,PP-SPSI	:	<i>Federasi Serikat Pekerja Pertanian dan Perkebunan Serikat Pekerja Seluruh Indonesia</i>
GAR	:	Golden Agri Resources
GSEP	:	GAR Social and Environmental Policy
GHG	:	Greenhouse Gas
GPS	:	Global Positioning System
HGU	:	<i>Hak Guna Usaha (Land Use Title)</i>
HIRAC	:	Hazard Identification Risk Assessment & Control
IDR	:	Indonesian Rupiah
ILO	:	International Labour Organization
IPM	:	Integrated Pest Management
ISPO	:	Indonesia Sustainable Palm Oil
KJGE	:	Kijang Estate
KJGM	:	Kijang Mill
KJNP	:	Kijang Kencana Plasma
KTP	:	<i>Kartu Tanda Penduduk / Identity Card</i>
KUD	:	<i>Koperasi Unit Desa (Village Cooperative Unit)</i>
Kopsa	:	<i>Koperasi Petani Sawit</i>
KTU	:	<i>Kepala Tata Usaha</i>
LSM	:	<i>Lembaga Swadaya Masyarakat</i>
LSU	:	Leaf Sampling Unit
MB	:	Mass Balance
MD	:	Managing Director
NGO	:	<i>Non-Governmental Organizations</i>
NSAM	:	<i>Nagasakti Mill</i>
OHS	:	Occupational Health and Safety
P&C	:	Principles and Criteria
<i>PermenLHK</i>	:	<i>Peraturan Menteri Lingkungan Hidup dan Kehutanan (Minister of Environment and Forestry Regulation)</i>
PIC	:	Person In Charge
PIR-TRANS	:	<i>Perkebunan Inti Rakyat - Transmigrasi</i>
PJ	:	<i>Puereria Javanica</i>
PK	:	Palm Kernel
PKWT	:	<i>Perjanjian Kerja Waktu Tertentu / Contract Worker</i>
PLN	:	<i>Perusahaan Listrik Negara / State Electricity Company</i>



POM	:	Palm Oil Mill
PPh	:	<i>Pajak Penghasilan</i> / Income Tax
PT	:	<i>Pekerja Tetap</i> / Permanent Workers
PT BWLM	:	PT Buana Wiralestari Mas
PUK	:	<i>Pimpinan Unit Kerja</i>
RBKE	:	Ramabakti Estate
RSPO	:	Roundtable on Sustainable Palm Oil
SSE	:	Sustainability and Stakeholder Engagement
SCCS	:	Supply Chain Certification Standard
SOP	:	Standard Operational Procedure
SPO	:	Sustainable Palm Oil
SPSI	:	<i>Serikat Pekerja Seluruh Indonesia</i>
SSU	:	Soil Sampling Unit
UHL	:	<i>Upah Hidup Layak</i>
UN	:	United Nation
WLTk	:	<i>Wajib Laporkan Ketenagakerjaan</i> / Obligated to Report About Employment

1.0	SCOPE OF THE CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used		
		<ul style="list-style-type: none"><li>• RSPO Certifications Systems for Principles &amp; Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020).</li><li>• Indonesia National Interpretation RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSPO Board of Governors on 20<sup>th</sup> April 2020.</li></ul>	
1.2	Organization Information		
1.2.1	Organization name listed in the certificate	Kijang POM - PT Buana Wiralestari Mas subsidiary of Golden Agri Resources Holdings Ltd.	
1.2.2	Contact person	Yahya Mustakim	
1.2.3	Organisation address and site address	<b>RSPO registered company:</b> 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535.  <b>Liaison Office:</b> Sinar Mas Land Plaza, Tower II, 30th Floor. Jl. MH Thamrin No. 51, Jakarta 10350, Indonesia.	
1.2.4	Telephone	(+62-21) 50338899	
1.2.5	Fax	(+62-21) 50389999	
1.2.6	E-mail	<a href="mailto:yahya.mustakim@sinarmas-agri.com">yahya.mustakim@sinarmas-agri.com</a>	
1.2.7	Web page address	<a href="http://www.goldenagri.com.sg">www.goldenagri.com.sg</a>	
1.2.8	Management Representative who completed the application for certification	Yahya Mustakim (Head of Sustainability Management System and Certification Operations Sustainability)	
1.2.9	Registered as RSPO member	1-0096-11-000-00 – 30 January 2005	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	1 (one) Palm Oil Mill (Kijang Mill) with 2 (two) supply bases (Kijang Mas Estate, Kijang Kencana Plasma)	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			LatitudeLongitude
	Kijang Mill	Sekijang Village, Tapung Hilir Sub-District, Kampar District, Riau Province, Indonesia	N 0° 50' 01"E 101° 02' 42"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			LatitudeLongitude
	Kijang Mas Estate	Sekijang Village, Tapung Hilir Sub-District, Kampar District, Riau Province, Indonesia	N 0° 49' 60"E 101° 02' 58"
	<b>Kijang Kencana Plasma (197 Farmer Groups; 4,073 smallholders)</b>		
	Koperasi Produsen	Kijang Java Village, Tapung Hilir Sub-	N 0° 50' 36"E 101° 04' 34"

	Makarti Buana Jaya Bersama (506 Smallholders)	District, Kampar District, Riau Province, Indonesia		
	Koperasi Produsen Berkat Ridho Bersama (350 Smallholders)	Kijang Jaya Village, Tapung Hilir Sub-District, Kampar District, Riau Province, Indonesia	N 0° 50' 35"	E 101° 03' 16"
	Koperasi Produsen Kijang Mas Lestari (387 Smallholders)	Kijang Jaya Village, Tapung Hilir Sub-District, Kampar District, Riau Province, Indonesia	N 0° 49' 08"	E 101° 59' 45"
	Koperasi Produsen Sawit Makmur Abadi Sejahtera (635 Smallholders)	Kijang Jaya Village, Tapung Hilir Sub-District, Kampar District, Riau Province, Indonesia	N 0° 50' 01"	E 101° 06' 19"
	KPSR Panca Warga (611 Smallholders)	Kijang Jaya Village, Tapung Hilir Sub-District, Kampar District, Riau Province, Indonesia	N 0° 52' 29"	E 101° 06' 45"
	KOPSA Budi Karya (500 Smallholders)	Kijang Jaya Village, Tapung Hilir Sub-District, Kampar District, Riau Province, Indonesia	N 0° 52' 21"	E 101° 08' 29"
	KUD Lestari Jaya (511 Smallholders)	Kijang Jaya Village, Tapung Hilir Sub-District, Kampar District, Riau Province, Indonesia	N 0° 49' 58"	E 101° 08' 24"
	Koperasi Produsen Tri Manunggal Abadi (573 Smallholders)	Kijang Jaya Village, Tapung Hilir Sub-District, Kampar District, Riau Province, Indonesia	N 0° 48' 19"	E 101° 08' 28"
1.5	Description of Area Statement			
1.5.1	Tenure			
	• State		2,369.39 Ha	
	• Community		8,147.79 Ha	
	Total			
<sup>1</sup> based on Land Title (HGU) No. 1/1994 (2,284.74 Ha); 1/1998(80.00 Ha) and HGB No. 1/2000 (4.65 Ha). <sup>2</sup> based on Ownership Right Certificates (SHM) of smallholders.				
1.5.2	Area Statement			
	Description	Kijang Estate	Kijang Kencana Plasma	TOTAL (Ha)
	Total area	2,369.39	8,147.79	10,517.18
	Mature area	1,487.78	8,147.79	9,635.57
	Immature area	565.13	-	565.14
	Mill and Emplacement	57.48	-	57.48
	Nursery	58.50	-	58.50
	Roads	140.33	-	140.33
	Weirs / lowland / river	56.81	-	56.81
	Others	3.36	-	3.36
	HCV (calculated as planted area, road and others)	31.43	-	31.43
	Noted: Area that not has HGU yet 56.07 Ha not include from the scope of certification and the progress of land tenure was include in partial certification.			
1.6	Planting Year and Cycles			



1.6.1	Age profile of planting year						
	Planting Year	(Ha)					
		Kijang Estate	Kijang Kencana Plasma	TOTAL			
	1991	5.49	369.00	374.50			
	1992	316.96	2,339.00	2,655.95			
	1993	9.27	3,185.00	3,194.27			
	1994	-	1,467.00	1,467.00			
	1995	-	504.80	504.80			
	1996	1.05	58.00	59.05			
	1997	-	52.70	52.70			
	1998	-	47.30	47.30			
	2001	-	124.99	124.99			
	2019	1,155.01	-	1,155.00			
	Sub Total Mature	1,487.78	8,147.79	9,635.57			
	2020	474.19	-	474.19			
	2021	90.94	-	90.95			
	Sub Total Immature	565.13	-	565.14			
TOTAL	2,052.91	8,147.79	10,200.70				
1.6.2	New Planting area after January 2010		- Ha				
1.6.3	Planting Cycle		2 <sup>nd</sup> Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Kijang Mill	60	255,189.05	45,510.86	17.83	13,778.23	5.40
*Production data source from November 2021 to October 2022							
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)	%
	Kijang Mas Estate	2,369.39	1,487.78	11,487.03	7.72	153.13	1,33
	Kijang Kencana Plasma (197 Farmer Groups; 4,073 smallholders)						
	Koperasi Produsen Makarti Buana Jaya Bersama (506 Smallholders)	1,011.00	1,011.00	21,862.61	21.62	21,862.61	100
	Koperasi Produsen Berkati Ridho Bersama (350 Smallholders)	700.00	700.00	15,732.40	22.47	15,732.40	100
	Koperasi Produsen Kijang Mas Lestari (387 Smallholders)	774.00	774.00	16,419.96	21.21	16,419.96	100
	Koperasi Produsen Sawit Makmur Abadi Sejahtera (635 Smallholders)	1,270.00	1,270.00	32,738.39	25.78	32,738.39	100
	KPSR Panca Warga (611 Smallholders)	1,224.79	1,224.79	35,548.28	29.02	35,548.28	100

	Kopsa Budi Karya (500 Smallholders)	999.00	999.00	27,985.83	28.01	27,985.83	100
	KUD Lestari Jaya (511 Smallholders)	1,022.00	1,022.00	26,379.12	25.81	26,379.12	100
	Koperasi Produsen Tri Manunggal Abadi (573 Smallholders)	1,147.00	1,147.00	30,039.07	26.19	30,039.07	100
	<b>Total Smallholders</b>	<b>8,147.79</b>	<b>8,147.79</b>	<b>206,705.66</b>	<b>25.37</b>	<b>206,705.66</b>	<b>100</b>
	<b>TOTAL</b>	<b>10,517.18</b>	<b>9,635.57</b>	<b>218,192.69</b>	<b>25.72</b>	<b>206,858.79</b>	<b>94.81</b>
	<i>*Production data source from November 2021 to October 2022</i>						
	<i>**FFB from Kijang Estate partially sent to Nagasaki Mill</i>						
1.7.3	FFB description from other source						
	<b>Name of sources/Organization</b> (RSPO certified / non-certified)	<b>Type of Organization</b>	<b>number of smallholders</b>	<b>Production Area (Ha)</b>	<b>Supplied to Mill</b> <b>FFB</b> (tones/year)		
	<b>RSPO Certified</b>						
	Libo Estate	PT Ivomas Tunggal	-	4,377.69	332.12		
	Sei Rokan Estate	PT Ivomas Tunggal		3,921.49	421.12		
	Nagasaki Estate	PT Buana Wiralestari Mas	-	5,025.47	1,170.02		
	Ramabakti Estate	PT Ramajaya Pramukti	-	2,677.48	1,893.92		
	<b>RSPO Non-Certified</b>						
	Kijang Mas Estate	PT Buana Wiralestari Mas	-	56.07	151.82		
	Nagamas Estate	PT Buana Wiralestari Mas	-	253.29	4,541.74		
	Nagasaki Estate	PT Buana Wiralestari Mas	-	59.79	861.42		
	Berkat Ridho Plasma (BRDA)	Independent Smallholder	-	91.71	2,398.64		
	Dami Mas Estate	Independent Outgrower	-	150.10	2,462.30		
	Third Party Supplier	Independent Supplier	-	-	34,161.62		
	<b>TOTAL</b>					<b>48,394.72</b>	
	<i>*Production data source from November 2021 to October 2022</i>						
1.7.4	Product categories		<b>FFB, CPO, PK</b>				
1.8	<b>Tonnage of Product</b>						
1.8.1	<b>Past Annual Claim Certified Product</b>		Last Year Projected + Ext Volume		Last Year Actual Certified Volume		
	FFB Processed (Estate + Scheme)		221,000		210,675.97		
	CPO Production		43,000		37,857.21		
	Palm Kernel (PK) Production		12,500		11,642.35		
1.8.2	<b>Product selling</b>						
	<b>Type of selling product</b>		Actual selling product for last year (November 2021 to October 2022) (MT)				
	CSPO sold as RSPO certified product		34,362.31				
	CSPK sold as RSPO certified product		11,403.77				
	CSPO sold under another scheme		3,364.86				
	CSPK sold under another scheme		0				
	CSPO sold as conventional		0				
	CSPK sold as conventional		0				

1.8.3	Estimate of Certified FFB Claim							
	Name of Estate(s)		Total Area (Ha)	Production Area (Ha)	FFB (tones/year)	Yield (tones/ha/year)		
	Kijang Mas Estate		2,369.39	1,487.78	14,900	10.01		
	Kijang Kencana Plasma (197 Farmer Groups; 4,073 smallholders)							
	Koperasi Produsen Makarti Buana Jaya Bersama (506 Smallholders)		1,011.00	1,011.00	21,800	21.56		
	Koperasi Produsen Berkat Ridho Bersama (350 Smallholders)		700.00	700.00	16,100	23.00		
	Koperasi Produsen Kijang Mas Lestari (387 Smallholders)		774.00	774.00	16,700	21.58		
	Koperasi Produsen Sawit Makmur Abadi Sejahtera (635 Smallholders)		1,270.00	1,270.00	31,750	25.00		
	KPSR Panca Warga (611 Smallholders)		1,224.79	1,224.79	34,300	28.00		
	Kopsa Budi Karya (500 Smallholders)		999.00	999.00	28,000	28.03		
	KUD Lestari Jaya (511 Smallholders)		1,022.00	1,022.00	25,500	24.95		
	Koperasi Produsen Tri Manunggal Abadi (573 Smallholders)		1,147.00	1,147.00	29,800	25.98		
	Total Smallholders		8,147.79	8,147.79	203,950	25.03		
	TOTAL		10,517.18	9,635.57	218,850	22.71		
	*Projected FFB production for 12 months							
	1.8.4	Estimate of Certified Palm Product Claim						
		Name of Mill	Capacity (tones/ hour)	FFB Processed (tones/year)	CPO		Palm Kernel	
Out put (tones)					Extraction (%)	Out put (tones)	Extraction (%)	
Kijang Mill		60	218,850	41,600	19.01	11,400	5.21	MB
*Projected CSPO and CSPK production for 12 months								
1.9	Other Certifications							
	ISCC		Certificate No. EU-ISCC-Cert-ID218-20220021, valid thru 31 January 2023					
	ISPO		Certificate No. MUTU-ISPO/027, valid thru 30 August 2025					
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
Management Unit		Time Bound Plan	Estate (Supply Base)	Time Bound Plan	Location	Status		
Mill								
Pangkalan Panji Mill (PT Sawit Mas Sejahtera)		2013	Sawit Mas Estate	2013	Sumatera Selatan Province	Certified		
			Sawit Mas Estate (HGU on progress – 2,291 Ha)	2022		-		

Bumi Sawit Mill (PT Bumi Sawit Permai)	2013	Bumi Sawit Estate	2013	Sumatera Selatan Province	Certified
		Bumi Sawit Estate (HGU on progress – 773.39 Ha)	2022		-
Muara Kandis Mill (PT Djuanda Sawit Lestari)	2013	Muara Tawas Estate	2013	Sumatera Selatan Province	Certified
		Muara Kandis Estate	2013		Certified
		Muara Kandis Estate (HGU on progress – 418.49 Ha)	2022		-
		Muara Tawas Estate (HGU on progress – 57.7 Ha)	2022		-
		Smallholder (KKPA Pandawa)	2022		-
Sungai Rungau Mill (PT Sumber Indah Perkasa)	2013	Sungai Rungau Estate	2013	Kalimantan Tengah Province	Certified
		Sungai Seruyan Estate	2013		Certified
		Terawan Estate	2013		Certified
		Tangar Estate	2013		Certified
		Bukit Tiga Estate	2013		Certified
Bukit Perak Mill (PT Bumi Permai Lestari)	2013	Bukit Perak Estate	2013	Bangka Belitung Province	Certified
		Bukit Permata Estate	2013		Certified
		Bukit Permai Estate (PT Agrolestari Subur Sejahtera)	2024		-
		Bukit Lestari estate (PT Agrolestari Hijau Sentosa)	2024		-
Tanjung Kembiri Mill (PT Forestalestari Dwikarya)	2013	Tanjung Kembiri Estate	2013	Bangka Belitung Province	Certified
		Tanjung Rusa Estate	2013		Certified
		Tanjung Rusa Estate (HGU on process 48.81 Ha)	2023		-
		Tanjung Sawit Estate (PT Palmindo Biliton Berjaya)	2023		-
		Tanjung Sawit Plasma (PT Palmindo Biliton Berjaya)	2023		-
		Tanjung Rusa KKPA	2023		-
Sungai Buaya Mill (PT Sumber Indah Perkasa)	2014	Sungai Buaya Estate	2014	Lampung Province	Certified
		Sungai Buaya Estate (HGU on process – 155.46 Ha)	2022		-
		Smallholder (KKPA Gedung Aji Lama)	2014		Certified
		Smallholder (KKPA Mesuji)	2014		Certified
	2014	Sungai Merah Estate	2014	Lampung Province	Certified

Sungai Merah Mill (PT Sumber Indah Perkasa)		Sungai Merah Estate (HGU on process – 241.54 Ha)	2022		-
		Smallholder (KKPA Gedung Aji Baru)	2014		Certified
Kasuari Mill (PT Sinar Kencana Inti Perkasa)	2023	Cendrawasih Estate	2023	Papua Province	ST-1
		Nuri Estate	2023		ST-1
		Rajawali Estate	2023		ST-1
		Mambruk Estate (PT Sumber Indah Perkasa)	2023		ST-1
Pekawai Mill (PT Agrolestari Mandiri)	2022	Kayung Estate	2022	Kalimantan Barat Province	ST-1
		Pekawai Estate	2022		ST-1
		Sungai Kelik Estate	2022		ST-1
		Nanga Tayap Estate	2022		ST-1
		Smallholder (Kayung Plasma)	2023		ST-1
Kenanga Mill (PT Kencana Graha Permai)	2014	Kencana Estate	2015	Kalimantan Barat Province	Certified
		Cendana Estate	2015		Certified
		Kenanga Estate (PT Cahaya Nusa Gemilang)	2023		-
		Delima Estate (PT Kencana Graha Permai)	2023		-
		Smallholder (Kencana Plasma)	2024		-
		Smallholder (Kenanga Plasma)	2024		-
Perdana Mill (PT Binasawit Abadi Pratama)	2023	Perdana Estate	2023	Kalimantan Tengah Province	ST-1
		Langgana Estate	2023		ST-1
		Semandau Estate	2023		ST-1
		Muara Dua Estate	2023		ST-1
Kuayan Mill (PT Agrokarya Prima Lestari)	2023	Bukit Santuhai Estate	2025	Kalimantan Tengah Province	ST-1
		Tajur Beras Estate	2025		ST-1
		Seranau Estate	2025		ST-1
		Sungai Sambon Plasma	2025		-
		Sapiri Estate (PT Buana Adhitama)	2025		ST-1
		Sapiri Plasma	2025		-
		Bukit Dua Estate (PT Buana Adhitama)	2025		-

Belian Mill (PT Paramitra Internusa Pratama)	2022	Belian Estate	2022	Kalimantan Barat Province	ST-1
		Tengkawang Estate	2022		ST-1
		Muara Tawang Estate (PT Kartika Prima Cipta)	2022		ST-1
		Kapuas Hulu Estate (PT Persada Graha Mandiri)	2022		ST-1
		Sungai Beran Estate (PT Persada Graha Mandiri)	2022		ST-1
		Smallholder (Belian KKPA)	2023		-
		Smallholder (Muara Tawang KKPA)	2023		-
		Smallholders (Kapuas Hulu KKPA)	2023		-
Sungai Kupang Mill (PT Sinar Kencana Inti Perkasa)	2020	Sungai Kupang Estate	2020	Kalimantan Selatan Province	Certified
		Sungai Kupang KKPA	2023		-
Sungai Kikim Mill (PT Sawit Mas Sejahtera)	2022	Sungai Kikim Estate	2022	Sumatera Selatan Province	-
		Sungai Pangi Estate	2022		-
		Sungai Musi Estate	2022		-
		Sungai Saling Estate	2022		-
		Sungai Enim Estate (PT Bumi Sawit Permai)	2022		-
		Sungai Lematang Estate (PT Bumi Sawit Permai)	2022		-
		Sungai Bungur Estate (PT Prima Cipta Mandiri)	2022		-
		Sungai Lingsing Estate (PT Prima Cipta Mandiri)	2022		-
Tangar Mill (PT Mitrakarya Agroindo)	2023	Sulin Estate	2025	Kalimantan Tengah Province	-
		Sulin Plasma	2025		-
		Nahiyang Estate	2025		-
		Katayang Estate	2025		-
Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa)	2023	Sungai Magalau Estate	2023	Kalimantan Selatan Province	-
		Senakin Estate	2023		-
		Sungai Manunggul Estate (PT Mitra Nusa Permata)	2023		-
Jalemo Mill (PT Agro Lestari Sentosa)	2023	Jalemo Estate	2025	Kalimantan Tengah Province	-
		Kajui Estate (PT Agro Lestari Sentosa)	2025		-
		Manuhing Estate (PT Agro Lestari Sentosa)	2025		-



		Manuhing KKPA	2025		-
Sako Mill (PT Adi Tunggal Mahajaya)	2023	Mentaya Estate	2025	Kalimantan Tengah Province	ST-1
		Kuayan Estate	2025		ST-1
		Sako Plasma	2025		-
		Sungai Ayawan Estate	2025		-
		Sungai Nusa Estate	2025		-
Padang Halaban Mill (PT SMART Tbk)	2011	Padang Halaban Estate	2011	Sumatera Utara Province	Certified
		Pernantian Estate	2011		Certified
		Adipati Estate	2011		Certified
		Kanopan Ulu Estate	2011		Certified
Batu Ampar Mill (PT SMART Tbk)	2012	Batu Ampar Estate	2012	Kalimantan Selatan Province	Certified
		Batu Mulia Estate	2012		Certified
		Sungai Panci Estate	2012		Certified
		Sungai Panci KKPA	2012		Certified
Tanah Laut Mill (PT SMART Tbk)	2012	Tanah Laut Estate	2012	Kalimantan Selatan Province	Certified
		Kintapura Estate	2012		Certified
		Kintapura Estate (HGU on process - 636.33 Ha)	2022		-
Langga Payung Mill (PT Tampilan Nadenggan)	2012	Langga Payung Estate	2012	Sumatera Utara Province	Certified
		Paya Baung Estate	2012		Certified
		Normark Estate	2012		Certified
Hanau Mill (PT Tampilan Nadenggan)	2012	Hanau Estate	2012	Kalimantan Tengah Province	Certified
		Tasik Mas Estate	2012		Certified
		Tanjung Paring Estate	2012		Certified
		Langadang Estate	2012		Certified
		Medang Sari Estate (PT Satya Kisma Usaha)	2025		-
Semilar Mill (PT Tampilan Nadenggan)	2013	Semilar Estate	2013	Kalimantan Tengah Province	Certified
		Sei Rindu Estate	2013		Certified
		Mandang Estate (PT Buana Arta Sejahtera)	2013		Certified
		Puri Estate (PT Buana Arta Sejahtera)	2013		Certified
		Sei Rindu Estate (203.89 Ha)	2023		-
Jak Luay Mill (PT Tampilan Nadenggan)	2015	Pantun Mas Estate	2015	Kalimantan Timur Province	Certified
		Jak Luay Estate	2015		Certified
		Jak Luay KKPA	2023		-
		Long Buluh Estate	2015		Certified

		Long Buluh Estate (HGU on progress - 329.66 Ha)	2023		-
		Bukit Subur Estate	2015		Certified
		Bukit Subur Estate (HCV identification on process - 569.62 Ha)	2023		-
		Bukit Subur KKPA	2023		-
Leidong West Mill (PT MP Leidong West Indonesia)	2014	Leidong West Utara Estate	2014	Bangka Belitung Province	Certified
		Leidong West Selatan Estate	2014		Certified
		Bukit Intan Estate (PT Bumipermai Lestari)	2014		Certified
		Bukit Mas Estate (PT Bumipermai Lestari)	2014		Certified
Muara Wahau Mill (PT Kresna Duta Agroindo)	2014	Muara Wahau Estate	2014	Kalimantan Timur Province	Certified
		Gunung Kombeng	2014		Certified
Gunung Kombeng Mill (PT Kresna Duta Agroindo)	2022	Gunung Kombeng KKPA	2024	Kalimantan Timur Province	-
Rantau Panjang (PT Kresna Duta Agroindo)	2022	Rantau Panjang Estate	2022	Kalimantan Timur Province	-
		Rantau Panjang KKPA	2024		-
Jelatang Mill (PT Kresna Duta Agroindo)	2014	Bangko Estate	2014	Jambi Province	Certified
Pelakar Mill (PT Kresna Duta Agroindo)	2020	Pelakar Estate	2020	Jambi Province	Certified
		Batang Merangin Estate	2020		Certified
		Tiga Serumpun KKPA	2023		-
Langling Mill (PT Kresna Duta Agroindo)	2014	Bangko Estate	2014	Jambi Province	Certified
		Batang Gading Estate (PT Satya Kisma Usaha)	2023		-
		Batang Gading KKPA (PT Satya Kisma Usaha)	2024		-
Sungai Bengkal Mill (PT Satya Kisma Usaha)	2015	Sungai Bengkal Estate	2015	Jambi Province	Certified
		Sungai Bengkal Estate (RaCP process - 610.88 Ha)	2023		-
		Sungai Bengkal KKPA	2015		Certified
		Sungai Bengkal KKPA (RaCP process - 1,063.92 Ha)	2023		-
		Muara Kilis Estate	2015		Certified

		Muara Kilis Estate (RacP process - 1,460.54 Ha)	2023		-
		Kilis KKPA	2023		-
Bukit Kapur Mill (PT SMART Tbk)	2022	Bukit Kapur Estate	2023	Kalimantan Selatan Province	ST-1
		Sungai Cantung Estate	2023		ST-1
Samsam Mill (PT Ivo Mas Tunggal)	2009	Samsam Estate	2009	Riau Province	Certified
		Samsam Estate (HGU on progress – 29.09 Ha)	2022		-
		Kandista Estate	2009		Certified
		Kandista Estate (HGU on progress – 158.46 Ha)	2022		-
		Palapa Estate	2009		Certified
Libo Mill (PT Ivo Mas Tunggal)	2009	Libo Estate	2009	Riau Province	Certified
		Nenggala Estate	2009		Certified
		Nenggala Estate (HGU on progress 419.9 Ha)	2022		-
		Sei Rokan Estate	2009		Certified
		Sei Rokan Estate (HGU on progress – 102.7 Ha)	2022		-
		Sungai Tapung Plasma	2009		Certified
Ujung Tanjung Mill (PT Ivo Mas Tunggal)	2009	Ujung Tanjung Estate	2009	Riau Province	Certified
		Kandis Sejahtera KKPA	2023		-
		Swadaya Mas Bersama KKPA	2023		-
		Ujung Tanjung Estate (HGU on progress – 557.3 Ha)	2022		-
Naga Sakti Mill (PT Buana Wiralestari Mas)	2010	Naga Mas Estate	2010	Riau Province	Certified
		Naga Mas Estate (HGU on process – 253.39 Ha)	2022		-
		Naga Sakti Estate	2010		Certified
		Naga Sakti Estate (HGU on process – 59.79 Ha)	2022		-
		Rama Bakti Estate	2010		Certified
Kijang Mill (PT Buana Wiralestari Mas)	2010	Kijang Estate	2010	Riau Province	Certified
		Kijang Estate (HGU on process – 56.07 Ha)	2022		-
		Kijang Kencana Plasma	2010		Certified
Ramarama Mill (PT Ramajaya Pramukti)	2010	Ramarama Estate	2010	Riau Province	Certified
		Ramarama Estate (HGU on process – 318.76 Ha)	2022		-
		Amartajaya Plasma	2010		Certified

		Berkat Ridho KKPA	2023		-
		Produsen Rama Sawit KKPA	2023		-
		Smallholder (Ramarama KKPA)	2023		-
Indrasakti Mill (PT Meganusa Inti Sawit)	2011	Indralestari Estate	2011	Riau Province	Certified
		Indrasakti Estate	2011		Certified
		Indragiri Plasma	2011		Certified
		Mandiri Jaya Plasma	2022		-
		Indrasakti Plasma	2011		Certified
Bumipalma Mill (PT Bumipalma Lestari Persada)	2012	Bumi Lestari Estate	2012	Riau Province	Certified
		Bumi Palma Estate	2012		Certified
		Bumi Sentosa Estate	2012		Certified
		Bumi Palma Estate (HGU on process – 39.21 Ha)	2022		-
		Kharisma Estate (PT Kharisma Riau Sentosa Prima)	2024		-
		Kharisma Plasma (PT Kharisma Riau Sentosa Prima)	2024		-
Sawita Mill (PT Sawitakarya Manunggul)	2022	Sawita Estate	2022	Kalimantan Selatan Province	ST-1
		Pamukan Estate	2022		ST-1
		Sawita KKPA	2023		ST-1
Kenari Mill (PT Bangun Nusa Mandiri)	2023	Gaharu Estate (PT Bangun Nusa Mandiri)	2023	Kalimantan Barat Province	-
		Kenari Estate (PT Bangun Nusa Mandiri)	2023		ST-1
		KerANJI Estate (PT Bangun Nusa Mandiri)	2023		ST-1
		Smallholder (Gaharu Plasma)	2023		-
		Smallholder (Kenari Plasma)	2023		-
Sungai Air Jernih Mill (PT Bahana Karya Semesta)	2023	Sungai Air Jernih Estate	2023	Jambi Province	-
		Sungai Mentawak Estate	2023		-
		Sungai Mentawak KKPA	2023		
		Sungai Merak Estate	2023		-
		Sungai Badak Estate	2023		-
Sungai Perak Mill (PT Kruing Lestari Jaya)	2023	Sungai Perak Estate	2023	Kalimantan Timur Province	-
		Sungai Basung Estate	2023		-
		Sungai Pikan Estate	2023		
		Sungai Pilos Estate	2023		-
		Sungai Pikan Plasma	2023		

Sungai Kedang Mill (PT Harapan Rimba Raya)	2023	Sungai Kedang Estate	2023	Kalimantan Timur Province	-
		Sungai Tohan Estate	2023		-
		Kedang Pahu Estate	2023		-
		Sungai Pahu Estate (PT Rimba Rayatama Jaya)	2023		-
		Sungai Tohan Plasma	2023		
		Sungai Pahu Plasma (PT Rimba Rayatama Jaya)	2023		
	TBP is approve on June 2022.				
	<p>There is revision of timebound plan on 14 June 2022 made by Head of Operations Sustainability. There are justification for mills and estates that postpone, with explanation:</p> <ul style="list-style-type: none"><li>• Pandawa KKPA supply base of Muara Kandis Mill is postponed to 2024 due to the SHM process.</li><li>• Tanjung Rusa KKPA supply base of Tanjung Kembiri Mill is postponed to 2024 due to the SHM process.</li><li>• Tanjung Sawit Estate dan Tanjung Sawit KKPA (PT Palmindo Biliton Berjaya) are postponed to 2023 due to still in process for HGU and land rights (SHM)</li><li>• Kasuari Mill and supply bases are postponed to 2023 due to still in process of EIA (AMDAL) revision and permit for hazardous waste warehouse</li><li>• Pekawai Mill and supply bases are postponed to 2022 due to pandemic covid-19 so that on-site audit in 2021 cannot be implemented</li><li>• Kayung KKPA supply base of Pekawai Mill are postponed to 2024 due to still in process for land rights (SHM).</li><li>• Kenanga Estate (PT Cahaya Nusa Gemilang) dan Delima Estate (PT Kencana Graha Permai) are postponed to 2023 due to RaCP in Progress.</li><li>• Kencana KKPA and Kenanga KKPA supply base of Kenanga Mill are postponed to 2024 due to still in process for land rights (SHM).</li><li>• Perdana Mill and supply bases are postponed to 2025 due to still in process for HGU</li><li>• Kuayan Mill and supply bases are postponed to 2025 due to still in process for HGU</li><li>• Belian Mill and supply bases are postponed to 2022 due to pandemic covid-19 so that on-site audit in 2021 cannot be implemented.</li><li>• Belian KKPA, Muara Tawang KKPA and Kapuas Hulu KKPA supply base of Belian Mill are postponed to 2024 due to still in process for land rights (SHM).</li><li>• Sungai Kupang KKPA supply base of Sungai Kupang Mill are postponed to 2023 due to still in process for land rights (SHM).</li><li>• Sungai Kikim Mill and supply bases are postponed to 2023 due to RaCP in progress.</li><li>• Tangar Mill and supply bases are postponed to 2025 due to still in process for HGU.</li><li>• Sungai Magalau Mill and supply bases and supply bases are postponed to 2024 due to still in process for HGU and RaCP (LUCA review).</li><li>• Jalemo Mill and supply bases are postponed to 2025 due to still in process for HGU and RaCP (LUCA review).</li><li>• Sako Mill and supply bases are postponed to 2025 due to still in process for HGU.</li><li>• Medang Sati Estate (PT Saya Kisma Usaha) supply base of Hanau Mill are postponed to 2025 due to still in process for HGU.</li><li>• Jak Luay KKPA and Bukit Subur KKPA supply base of Jak Luay Mill are postponed to 2023 due to still in process for land rights (SHM).</li><li>• Gunung Kombeng KKPA supply base of Gunung Kombeng Mill are postponed to 2024 due to still in process for land rights (SHM).</li><li>• Rantau Panjang KKPA supply base of Rantau Panjang Mill are postponed to 2024 due to still in process for land rights (SHM).</li><li>• Tiga Serumpun KKPA supply base of Pelakar Mill are postponed to 2024 due to still in process for land rights (SHM).</li></ul>				

- Batang Gading Estate supply base of Langling Mill are postponed 2023 due to still in process for RaCP (LUCA review).
- Batang Gading KKPA supply base of Langling Mill are postponed to 2024 due to still in process for land rights (SHM).
- Kilis KKPA supply base of Sungai Bengkal Mill are postponed to 2024 due to still in process for land rights (SHM).
- Bukit Kapur Mill and supply bases are postponed to 2025 due to still in process for HGU.
- Rama-Rama KKPA, Berkas Ridho KKPA and Produsen Rama Sawit KKPA are postponed to 2023 due to still in process for land rights (SHM).
- Sawita Mill and supply bases are postponed to 2022 due to still in process for HGU.
- Sawita KKPA supply base of Sawita Mill are postponed to 2024 due to still in process for land rights (SHM).
- Kenari Mill and supply bases are postponed to 2023 due to the mill is fully operational in 2025.
- Sungai Air Jernih Mill and supply bases are postponed to 2023 due to still in process for legality documents.

Then there are additional units in 2022 with the acquisition by GAR of 2 mills and 16 Estates (11 own estates and 5 plasma/KKPA) and have been included in the timebound plan to be certified in 2023, with the following details:

1. PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA.
2. PT Harapan Rimba Raya: Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA.
3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA which will be supply base for Sungai Kedang Mill (PT Harapan Rimba Raya).
4. PT Agrolestari Subur Sejahtera (previously the company name is PT Bumi Permai Surya Lestari): Bukit Permai Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified.
5. PT Agrolestari Hijau Sentosa (previously the company name is PT Bumi Bangka Lestari): Bukit Lestari Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified.
6. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be supply base for Bumipalma Mill (PT Bumipalma Lestari Persada) which has been certified.
7. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be supply base for Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa).

There are some companies that are not fully certified, due to some area still on process to get land title (HGU) and RaCP process, consist of:

- PT Sawit Mas Sejahtera (Sawit Mas Estate)
- PT Bumi Sawit Permai (Bumi Sawit Estate)
- PT Djuanda Sawit Lestari (Muara Kandis Estate & Muara Tawas Estate).
- PT Forestalestari Dwikarya (Tanjung Rusa Estate);
- PT Sumber Indah Perkasa (Sungai Merah Estate and Sungai Buaya Estate).
- PT SMART Tbk (Kinta Pura Estate)
- PT Tapan Nadenggan (Long Buluh Estate and Bukit Subur Estate)
- PT Ivo Mas Tunggal (Samsam Estate, Kandista Estate, Nenggala Estate, Sei Rokan Estate, Ujung Tanjung Estate);
- PT Buana Wiralestari Mas (Nagasakti Estate; Nagamas Estate and Kijang Estate);
- PT Rama Jaya Pramukti (Ramarama Estate);
- PT Satya Kisma Usaha (Sungai Bengkal Estate, Kilis Estate and Sungai Bengkal KKPA)
- PT Bumipalma Lestari Persada (Bumi Palma Estate)
- PT Tapan Nadenggan (Sei Rindu Estate)

1.10.2	<b>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</b>
	Associated smallholders under scope of Kijang POM has been certified.



<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>ASA-2.1</b>	<p>1. <b>Briyogi Shadiwa (Lead Auditor)</b>. Indonesian citizen. Associate Degree of Oil Palm Plantation, Bogor Agricultural University. He has work experience since 2009 in several private oil palm plantation companies in Indonesia as Assistant Agronomy and Agronomy Quality Control. The trainings that have been attended include: RSPO Lead Auditor Course by Checkmark, ISPO Auditor Training by LPP, Lead Auditor ISO 9001: 2015, RSPO Supply Chain Certification Training Course by Checkmark, Lead Auditor ISO 14001: 2015, SMK3 Awareness, OHSAS 18001 Awareness: 2007, SA 8000 Awareness, ISO 45001: 2018 Awareness and General OHS Expert Training. In this audit, he verified the Legal, worker welfare and SCCS aspect.</p> <p>2. <b>Erika Lucitawati (Auditor)</b>. Indonesian citizen. Bachelor of Engineering with major in Environmental Engineering. The trainings that have been attended include ISPO Lead Training, RSPO Lead Training, In House Training of ISO 19011: 2018, ISO 17021: 2015, ISO 17065: 2012, ISO 9001: 2015, ISO 14001: 2015, ISO 45001: 2018, and The Supervision of Occupational Health and Safety Training. During this assessment, she verified Environmental, Social, GHG, and Waste Management aspects.</p> <p>3. <b>Firda Tarunajaya (Auditor)</b>. Indonesian citizen, graduated in 2010 from the Department of Silviculture, Faculty of Forestry, Bogor Agricultural Institute. He has working experienced for 10 years since 2010 as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The training he has followed namely: Lead Auditor RSPO, Lead Auditor ISPO, Quality Management Systems (ISO 9001:2015) by IRCA, Environmental Management Systems (ISO 14001:2015), ISO 19011:2018, ISO 17021:2011 and ISO 17065:2012. He has experienced in various audit activities related to the certification system of sustainable palm oil plantation since 2021. During this assessment, he performed as Auditor and verified BMP and OHS aspect</p> <p>4. <b>Sabiah Dhiningtyas Utami (Trainee Auditor)</b>. Indonesian citizen. Bachelor of Agriculture, Department of Agrotechnology, Padjadjaran University. She has attended ISPO Auditor Training, ISO IRCALAC 9001, Awareness ISO 19011:2018, ISO 14001:2015, ISO 45001:2018, ISO 17021:2015, ISO 17065:2012, RSPO Awareness and participated in several IHT in the fields of employment, environment, BMP, and other aspects. Has participated in several simulations of audit activities related to the certification system for sustainable palm oil plantations with labor and social aspects. In this audit activity, verifying the Worker Welfare aspect under the supervision of the Lead Auditor.</p> <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.</p>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
<b>ASA-2.1</b>	<p>Number of auditors : 3. Auditor and 1 auditor trainee</p> <p>Number of days for <b>ASA-2.1</b> at site : 4 days</p> <p>Number of working days for <b>ASA-2.1</b> at site : 12 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>ASA-2.1</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Buana Wiralestari Mas – Kijang POM to the requirements of <b>RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20<sup>th</sup> April 2020 and RSPO Certification Systems for Principles &amp; Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.</b></p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>In conducting the assessment the auditor team used the <math>\sqrt{y \times (z)}</math> formula to determine the cooperative sampling which was the focus of the assessment. The samples for this audit are KUD Panca Warga, KUD Manunggal Abadi, KOPSA Budi Karya and KUD Lestari Jaya. As for the main estate, the audit sample is Kijang Estate.</p>

Some opportunities for improvement of the results ASA-2.1 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA-2.2.

All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-2.1.

The opening meeting was held on November 28<sup>th</sup>, 2022 at RC-PC Office Kampar Region. As for the participants who attended the opening meeting included Plantation Controller, General Manager, Estate and Mill Managers, Support Team from Jakarta and other staff at Estate and POM. Closing meeting was held on December 8<sup>th</sup>, 2022 which was attended by the same participants as the opening meeting. Management PT Buana Wiralestari Mas accept all the ASA-2.1 audit results.

The assessment program please find Appendix 2

2.2.3	<b>Locations of Assessment</b>
ASA-2.1	<p>The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p><b>Kijang POM (KJGM)</b></p> <ul style="list-style-type: none"> <li>• <b>Weighbridge station.</b> Interview with 1 worker related to supply chain aspect and worker welfare</li> <li>• <b>Grading Station.</b> Observations and interviews related work procedure, safety aspect, worker welfare etc.</li> <li>• <b>Loading Ramp Station.</b> Observations and interviews related work procedure, safety aspect, worker welfare etc.</li> <li>• <b>Sterilizer Station.</b> Observations and interviews related work procedure, safety aspect, worker welfare etc.</li> <li>• <b>Engine Room.</b> Observation related work procedure, safety aspect, worker welfare, environment aspect etc.</li> <li>• <b>Boiler Station.</b> Observation and interviews related work procedure, safety aspect, worker welfare etc</li> <li>• <b>Security Post.</b> Observation and interview related to work procedure, emergency response facility, OHS, worker welfare and supply chain aspect.</li> <li>• <b>Workshop.</b> Observation and interview related to work procedure, OHS and workers welfare aspect.</li> <li>• <b>Hydrant Simulation.</b> Observation and simulation related to fire emergency respond.</li> <li>• <b>Hazardous Waste Storage.</b> Observation related to storage condition, hazardous waste stock, OHS, emergency response facility, and waste management.</li> <li>• <b>Oil Storage.</b> Observation related to storage condition, MSDS, OHS, emergency response facility and hazardous waste management.</li> <li>• <b>Chemical Material Storage.</b> Observation related to storage condition, MSDS, OHS, emergency response facility and hazardous waste management.</li> <li>• <b>General Storage.</b> Observation related to storage condition, material stock, PPE stock, OHS and emergency response facility.</li> <li>• <b>Employee Housing Complex.</b> Observation and interview related to waste management, house condition and infrastructure for the welfare of workers and their family.</li> <li>• <b>Water Treatment Plant.</b> Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.</li> <li>• <b>WWTP.</b> Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.</li> <li>• <b>Solid Waste Area (Empty Bunch, Shell, and Fiber).</b> Observation related to implementation of procedure, OHS, and waste management aspects.</li> </ul> <p><b>Kijang Estate (KJGE)</b></p> <ul style="list-style-type: none"> <li>• <b>Replanting Area Block K51 Division 2.</b> Observation Area Replanting</li> <li>• <b>Beneficial Plant Block K49 Divisi 2.</b> Observation <i>Beneficial Plant Turnera Subulata</i> and <i>Antigonon Leptopus</i></li> <li>• <b>Luguminosae Block K50 dan K51, Division 1.</b> Observation leguminosae <i>Mucuna Bracteata</i></li> </ul>

- **Harvesting Block L45, L44 Division 2.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **Barn Owl Boxes/Gupon in K49.** Observation Barn Owl Box of *Tyto Alba*
- **Nursery.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **Sanitation Block J17 Division 2.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **Immature Area Block K49, K50, K51, K52 Division 2.** Observation Immature Area
- **Employee Housing Complex.** Observation and interview related to waste management, house condition and infrastructure for the welfare of workers and their family.
- **Daycare.** Observation and interview related to day-care condition, public facility, OHS, worker welfare and waste management.
- **Rinse House.** Observation related to implementation of procedure, OHS and waste management.
- **Landfill Block K39.** Observation related to waste management and environmental aspect.
- **General Storage.** Observation related to storage condition, material stock, PPE stock, OHS and emergency response facility.
- **Agrochemical Storage.** Observation related to storage condition, agrochemical stock, OHS, emergency response facility and hazardous waste management.
- **Fertilizer Storage.** Observation related to storage condition, fertilizer stock, OHS, emergency response facility and hazardous waste management.
- **Hazardous Waste Storage.** Observation related to storage condition, hazardous waste stock, OHS, emergency response facility, and waste management.
- **Oil Storage.** Observation related to storage condition, MSDS, OHS, emergency response facility and hazardous waste management.
- **Solar Storage.** Observation related to storage condition, OHS and emergency response facility.
- **Firefighting Storage.** Observation related to condition the firefighting facilities and equipment.
- **Firefighting Simulation.** Observation related to condition the firefighting facilities and equipment and preparedness.
- **Workshop.** Observation and interview related to work procedure, OHS and workers welfare aspect.
- **HGU Pole No. 02, No. 04, No. II.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **Sialangkalo River Riparian Block H17, Block I48 dan Block J52 Division III.** Observation related to management of environmental aspect.
- **Land Application Block J50 Division 1.** Observation related to implementation of procedure, OHS, and waste management aspects.

#### Kijang Kencana Plasma (KJNP)

- **Fertilizer Storage.** Observation related to storage condition, fertilizer stock, OHS, emergency response facility and hazardous waste management.
- **KUD Panca Warga**
  - **5 land owners of KUD Panca Warga.** Field Observation and interview with land owners related to association procedures (Legal, Agronomy, Labor and Environment aspect).
  - **Pole Boundaries No. 2200, 2307, 2342, 2377 and 2405, Block F44, Karya Mukti Farmer Group.** Field observations to see the suitability of the coordinates, position and condition of the stakes.
  - **Rinse House.** Observation related to implementation of procedure, OHS and waste management
- **KUD Manunggal Abadi**
  - **Rinse House.** Observations and interviews related to pesticide management
  - **General storage.** Observation about condition, PPE stock, emergency response and OHS implementation
  - **5 land owners of KUD Manunggal Abadi.** Field Observation in Block M55 and M54 and interview with land owners related to association procedures (Legal, Agronomy, Labor and Environment aspect).
- **KOPSA Budi Karya Block C46.** Field Observation and interview with 6 land owners related to association procedures (Legal, Agronomy, Labor and Environment aspect).

	<ul style="list-style-type: none"> <li><b>KUD Lestari Jaya.</b> Field Observation and interview with 5 land owners related to association procedures and 2 Harvester in Block I51 and I52 (Legal, Agronomy, Labor and Environment aspect)</li> </ul>
<b>2.3</b>	<b>Stakeholder Consultation and Stakeholders Contacted</b>
<b>2.3.1</b>	<b>Summary of stakeholder consultation process.</b>
<b>ASA-2.1</b>	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Buana Wiralestari Mas was held by:</p> <ul style="list-style-type: none"> <li>Public Notification on website MUTU on 14 November 2022</li> <li>Public consultation meeting with government institution (30 November 2022)</li> <li>Public consultation meeting with communities including previous land owner (30 November 2022)</li> <li>Public consultation meeting with internal stakeholders and contractor on 30 November–1 December 2022</li> <li>Public Consultation with NGO (WWF, WALHI, Sawit Watch and AMAN) on 21 November 2022.</li> </ul> <p>Numbers of input from stakeholders were clarified by PT Buana Wiralestari Mas</p>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	Please find appendix 1
<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit ASA-2.2 will be conducted eight (8) month to twelve (12) month after licenses approved.

### 3.0 ASSESSMENT FINDINGS

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

MUTUAGUNG LESTARI has conducted an assessment of Kijang POM – PT Buana Wiralestari Mas subsidiary of GAR Ltd operation consisting of one (1) mill, one (1) estate and one (1) scheme smallholders with 4,073 members.

During the assessment, there were no nonconformities were identified.

MUTUAGUNG LESTARI found that Kijang POM – PT Buana Wiralestari Mas subsidiary of GAR Ltd complied with the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification		
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY			
1.1			
The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1			
Unit of certification has procedure and has appointed person in charge in the requests for information from stakeholders (SOP/SMART/UMUM/SADVI/004). Unit of certification also responded to information requests with maximum time of 3 days since mail received. Based on verification document and interview with external stakeholders, management always responds the information request no longer than 3 working days.			
Documents can be accessed publicly through website <a href="http://www.smart-tbk.com">www.smart-tbk.com</a> , including sustainability policy, human rights policy, ethical code, conservation management and monitoring, etc. The types of documents that can be accessed and given to stakeholders are included in the information list for stakeholders, such as public documents, legal document, environmental documents (environmental policy, environmental management, and monitoring report, etc.), social document, OHS policy and program, and manpower documents. These documents are available in Estate and Mill office. The company has provided information that can be accessed by the public according to relevant stakeholders such as land use rights, EHS documents, environmental documents, HCV documents, waste management documents, environmental management, employment etc. For example; periodically, unit certification sends monitoring and management documents to the related institutions such as; Environment Agency, <i>BKSDA</i> , and Manpower Office.			
1.1.2			
Unit of certification has also mandatory report of environmental, manpower, legality and other aspects to the government agency which are available in Bahasa and in accordance with applicable regulations. Unit of certification has shown examples of receipt of mandatory report to government agency which has been summarized in the following table:			
No	Mandatory Report	Relevant Agency	Date
1	Hazardous Waste Management Report of Third Quarter 2022 PT BWL	Environmental Agency of Kampar Regency Environmental Agency of Riau Province Ministry of Environmental and Forestry	22 November 2022  Electronic receipt number 1667217876-1656
2		Environmental Agency of Kampar Regency	22 November 2022



Report of Environmental Analysis Third Quarter 2022 PT BWL		Environmental Agency of Riau Province Ministry of Environmental and Forestry	Electronic receipt number 1667217856-1656
3	Report on Implementation of Management and Monitoring Plan (RKL-RPL) of First Semester 2022 PT BWL	Environmental Agency of Kampar Regency Environmental Agency of Riau Province Ministry of Environmental and Forestry	19 August 2022  Electronic receipt number 1659287536-1656
7	Report of OHS Committee of Third Quarter 2022	Manpower and Transmigration Office of Kampar Regency	11 October 2022
8	Report of HGU Implementation 2022	National Land Agency of Kampar Regency	10 June 2022
9	Report of Plantation Activity of 2022	Plantation, Livestock and Animal Health Agency of Kampar Regency	19 August 2022
10	Report of Investment Activity of 2022	Ministry of Investment	15 July 2022

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

### 1.1.3

Unit of certification has SOP for communication and consultation to stakeholders in document no. SOP/SMART/UMUM/SADV/I004 which was conveyed on July 1, 2014, by Sustainability Division Head. The document describes the mechanism regarding requests for information and responses provided by company to all stakeholders. Unit of certification shows Form No. F/SMART/UMUM/SADV/004/002 (Rev 0.0) in the Information Request and Response Logbook, it is known that there were no requests for information from stakeholders addressed to the company for 2022. However, there are records of incoming letters, for example, letter No. 141/KJGE\_Intr/06/2022 from Kijang Estate to Kijang POM regarding the dump truck vehicle registration application of KJGM unit on 28 June 2022. This has been responded by unit of certification on 28 June 2022.

### 1.1.4

Records of requests for information from internal and external stakeholders along with their responses are presented in Book of Communication and Request for Information of 2022, which informs, among other things, the record number, date of entry of requests for information, address information requester, recipient, description of communication, type of communication, description of response/response, date of response, as well as information regarding other records. The consultation procedure has been explained to all relevant stakeholders by the appointed management representative which was carried out in the socialization activity regarding the consultation procedure on August 20, 2020 at Kijang Makmur Village office. This has been in accordance with interview result with village representatives of Kijang Jaya and Tanah Tinggi Village, as well as local government, labor union and gender committee which shown that they had a good understanding of communication and consultation procedures.

### 1.1.5

Unit of certification shows list of stakeholders consisting of legal entities, indigenous peoples, local communities, workers' organizations, smallholders, FFB suppliers, and independent services, and NGOs. The documents contain a list of names, types of relevant stakeholders, and stakeholder contacts. The following is a summary of the contents of the document:

- Legal Entities: 23, consisting of government agencies (Provincial/District government offices, Police, *Jamsostek*, Banks, and Educational Institutions)
- Local Communities: 11, consisting of community leaders, youth leaders, and village government
- Workers' Organizations: 16, consisting of PUK/DPC/DPD SPSI and the Women's Commission
- Smallholders: 8, consisting of KUD (*Makarti Buana Jaya Bersama, Berkah Ridho Bersama, Kijang Mas Lestari, Makmur Sejahtera,*



*Panca Warga, Budi Karya, Lestari Jaya and Tri Manunggal Abadi)*

- Independent FFB Suppliers and Service Contractors: FFB Transporters and Service Contractors
- Local NGOs: 3 NGOs

The address and contact number of each stakeholder representative is available. Based on sampling for interviews with stakeholders referring to the stakeholder list document, it can be concluded that all contacts listed in the document are still active and in accordance with the data provided.

**Status: Comply**

## 1.2

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

#### 1.2.1

The certification unit's commitment to ethical behavior is contained in the Sinarmas Agribusiness and Food Business and Human Rights Policy which was ratified on December 12<sup>th</sup>, 2019, by the Head of Policy and Compliance Division. The policy consists of 11 commitments which include elements of respect for the rights and dignity of workers in accordance with applicable laws and regulations, preventing forced labor and human trafficking, not using child labour, respecting local communities or customary rights, respecting and protecting whistleblowers and defenders, human rights, comply with laws related to the prevention of bribery and corruption.

In addition, the unit of certification also has a GAR Social and Environmental Policy (GSEP). The policy was ratified on September 8<sup>th</sup>, 2015, by the Head of Upstream, CEO – Downstream & Commercial, Executive Director & CFO and Managing Director of Sustainability & Strategic Stakeholder Engagement. The document describes the basic commitments of GAR's upstream and downstream palm oil operations which include environmental management, social and community engagement, work environment and supply chain industrial relations and trading.

Socialization regarding this policy has been carried out in each estate and mill unit, for example socialization at the KJGM unit on April 11<sup>th</sup>, 2022, and at the KJGE unit on June 20<sup>th</sup>, 2022. This socialization has also been carried out to external stakeholders on February 18<sup>th</sup>, 2022.

Based on interviews with employees, representatives of internal and external stakeholders, it is known that the policy has been understood and implemented in all business operations and transactions, including recruitment and contracts.

#### 1.2.2

The unit of certification has a mechanism to monitor compliance and the implementation of ethical business policies and practices through inspection and evaluation of compliance. For example, conducting regular internal audits to ensure operational units comply with policies and SOPs. The scope of the internal audit is the compliance of each unit in the plantation and factory with all aspects contained in the RSPO P&C such as aspects of employment, environment, BMP and other aspects.

In addition, the unit of certification ensures that contractors and their suppliers know and comply with Contractor Control SOP number SOP/Smart/UMUM/SADV/II/006 as well as Sinarmas Agribusiness and Food Business and Human Rights Policies. In its implementation, the certification unit has an assessment of the contractor as stated in the Contractor Inspection Form Number F/SMART/UMUM/SADV/006/001 and the Contractor Evaluation and Recommendation Form Number F/SMART/UMUM/SADV/006/002. The two forms are used to assess the implementation of compliance with contractors including work environment, emergency response, work equipment, work in hazardous areas (height, confined space and heat), business ethics, contractor quality and performance criteria, timely completion of work, compliance with labor regulations, compliance with OHS implementation, housekeeping and compliance with environmental regulations.

Based on the results of interviews with workers in factories and plantations, information was obtained that they knew about the company's policies to respect human rights and commitment to ethical behavior in all work operations. In addition, interviews with contractors revealed that the policy had been socialized when the contract was drawn up.

**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

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

Unit of certification has complied with relevant laws and regulations which is shown in following documents:

- Environmental Impact Analysis (*AMDAL*) document in 1993 for Oil Palm Plantation of PT Buana Wiralestari Mas–Sikijang Estate with an area of ±13,000 Ha on a reserve area of ±15,000 Ha and processing plant with capacity of 60-ton FFB/hour. The document has been approved by Ministry of Agriculture based on decree number RC.220/889/B/V/1994 dated 19 May 1994.
- Environmental management planning document in the form of RKL-RPL 1995 which was approved by Ministry of Agriculture based on decree number 091/RKL-RPL/BA/IV/1996 on 30 April 1996.
- Permit of Hazardous and Toxic Waste Management for temporary storage activities in PT Buana Wiralestari Mas based on One Stop Investment and Services Office of Kampar Regency Decree Number 503/Per.B/2020/29 dated 18 August 2020 and is valid for 5 years. The permit refers to Recommendation Letter from Environmental Agency number 660/DLH-PPKL/REK-LB3/2020/26 dated 29 June 2020. The permit is valid for 2 storages owned by unit of certification namely those located at Kijang POM (N: 00° 49' 54' 107" and E 101° 02' 38,196") and Kijang Estate (N 00° 50' 00.7" and E 101° 03' 01.0").
- Permit of Utilization of Palm Oil Industrial Wastewater on Soil in Oil Palm Plantation for PT Buana Wiralestari Mas – Kijang POM based on One Stop Investment and Services Office of Kampar Regency Decree Number 503/DPM-PTSP.PEL/LA/2017/13 which was ratified on 21 December 2017 and is valid for 5 years with land area that is permitted for application of 346.16 Ha.
- Domestic Wastewater Disposal Permit to Surface Water for PT Buana Wiralestari Mas–Kijang POM based on One Stop Investment and Services Office of Kampar Regency Decree Number 503/DPM-PTSP.PEL/LD/2020/65 which was legalized on 23 October 2020 and is valid for 5 years.
- Permit of Surface Water Utilization based on Decree of Minister of Public Works and Public Housing Number 645/KPTS/M/2018 dated 4 September 2018 regarding granting of water resource exploitation permit to PT Buana Wiralestari Mas–Kijang POM. The water intake location is on Sialang River with maximum discharge of 36,000 m<sup>3</sup>/month.
- HCV identification conducted by the company internally led by Norman Faried Mustakim (approved RSPO HCV Assessor) in 2010 for Nagamas, Nagasaki, and Kijang Estate units with coverage area of 12,574.55 ha with Final documents in February 2011. Based on result of the HCV study, HCV area was 411.55 Ha with a total of 31.43 Ha which was included in the scope of certification.

#### **Compliance with Worker Welfare Regulation:**

- Employment report of KJGM unit with reporting number 28464.20220603.0001, report date on June 3<sup>rd</sup>, 2022, and obligation to report back on June 3<sup>rd</sup>, 2023.
- Employment report of KJGE unit with reporting number 28464.20220617.0001, report date on June 17<sup>th</sup>, 2022, and obligation to report back on June 17<sup>th</sup>, 2023.
- The company has complied with the implementation of minimum wages for all employees in accordance with applicable regional regulations (Riau Governor's Decree on District/City Minimum Wages in Riau Province 2022).
- All employees have been registered in BPJS (Social Security) Health and BPJS (Social Security) employment.

#### **Compliance with Legality Regulation:**

- IMB based on District Head of Kampar Decree (No.: 650/CKTR/IMB/0569) on December 19, 2008 for the construction of a warehouse and staff house at Kijang Estate, Tapung Hilir District.
- Kijang Mill is Part of PT Buana Wiralestari Mas, PT. BWL had obtained a plantation business permit long before Permentan No. 26 of 2007 was enacted so that it is not subject to the obligation to develop plasma plantations for the surrounding community. However, the company already has cooperation with the community regarding the development of scheme smallholder with the PIR TRANS (Kijang Plasma) pattern.

#### **Best Management Practices**

Several regulation pursuance towards applicable regulation conducted by the unit of certification is presented as follows:

- Has conduct zero burning for land preparation/replanting.
- Has committed to reduce and avoid the use of pesticide, especially those that classified on WHO 1A, 1B and Paraquat. Furthermore, all pesticides used were registered in Pesticide Commission of Department of Agriculture.
- Has used seeds from producers recognized by Government of Indonesia.

- Unit of certification has adopted integrated pest management which consist of early warning system, census, biological control, chemical control with justification and evaluation

#### **Compliance with Occupational Health and Safety Regulation:**

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

- Has a license / competency for some special jobs that require more expertise such as OHS experts, hiperkes, boiler operators, and others in accordance with the requirements contained in the legislation

#### **2.1.2**

The certification unit has SOP to comply with regulations & other requirements (SOP / SMART / UMUM / SADV / I / 002, dated July 1, 2014). Regulatory updates are carried out at least once a year (Updated on 22 June 2022). The officers responsible for updating the list of regulations according to the SOP are: Identification of regulations at the national level by SADV and at the regional level by Regional SPO Officer and SPO Officer unit. The document describes the company's compliance with the regulations in force in the Republic of Indonesia, for example the fulfilment of the latest regulations such as the Decree of the Governor of Riau regarding the Provincial Minimum Wage for 2022.

#### **2.1.3**

The company has a map that showing the location of the boundary poles in each estate. The company has also monitored HGU boundary pole in 2021/2022 by showing the results of monitoring record "Monitoring Patok Batas HGU Periode Mei-Juni 2022", in accordance with the maintenance procedures (SOP / SMART / CERS-EHSD / SADV / I / 004, 1 July 2014). The procedures include stating that the PMNP team ensures and coordinates with the head unit so that the position and number of the stake are in accordance with the Land Use Title / and Building Right map. In addition, it is also stated that the stakes care is carried out at least 1 x 4 months. The results of virtual field observations on the boundary pole for example No. 02, 04 and II on Kijang Estate are found and that the condition of the boundary poles is well maintained. Likewise with the boundary markers between plasma members, all of which can be seen in the field and are in good condition and clearly visible.

**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**

The certification unit has a list of contractors that informs the contractor's name, address, telephone number, job description and others. The list of contractors is in line with the information in the list of stakeholders and all third party has been listed such as transportation of FFB, hazardous waste contractor, etc. The unit of certification has shown a list of contractors for the 2022 period, which is as follows:

- PT Satrindo Jaya Agropalma, Cooperation in the transportation of CPO, PK and FFB
- PT Primanru Jaya, Cooperation in the transportation of hazardous and toxic waste
- PT Ivomas Tunggal Lestari, Cooperation in fabrication and maintenance
- PT Mechmar Jaya Industri, Cooperation in boiler service
- PT Mugi, Cooperation in weighing bridge calibration
- PT Arpindo Multi Utama, Cooperation in safety training organizer
- PT Arpitek Utama, Cooperation in inspection and consulting engineering

The unit of certification also shows work agreement documents with third parties. As an example:

- Work agreement letter number 003/BWL/KJGM/01/2020-CPO between PT Satrindo Jaya Agropalma and the KJGM unit for the work of transporting CPO. The work agreement letter is valid from January 2<sup>nd</sup>, 2020 to December 31<sup>st</sup>, 2022.
- Work agreement letter number 151/EPMD/SPK-Pengelolaan LB3/BWL-PJ/IX/2022 between PT Primanru Jaya and PT BWLM for the work of transporting and managing hazardous and toxic waste. The work agreement is valid from September 22<sup>nd</sup>, 2022 to September 21<sup>st</sup>, 2025.

The unit of certification has also shown a list of contractor workers for the period October 2022. For example, a list of 340 employees for PT SJA contractors.

#### **2.2.2**

The unit of certification shows the work agreement document with the contractor. In the cooperation contract it is explained that there is an article which stipulates that the contractor is obliged to follow the labor laws that apply in Indonesia. For example, the work agreement document for the transport of FFB between the certification unit and PT Satrindo Jaya Agropalma with number 006/BWM/JKTO-V/XII/2021-ATBS dated December 2<sup>nd</sup>, 2021. The document explains that the second party must comply with applicable labor regulations, such as wages for contractor workers, prohibition on the use of underage workers, provision of work facilities, compensation for work accidents, etc.

The unit of certification also shows the implementation of compliance with labor regulations by contractors, for example:

- Salary slips for contractor workers of PT SJA with the initials AH who receive wages in October 2022 of IDR 4,253,079, which consists of a basic wage component of IDR 3,116,737, premium of IDR 1,261,011, allowances (*BPJS Ketenagakerjaan*, *BPJS Kesehatan*, Rice, etc.) as well as deductions (*PPh 21*, *BPJS*, loans, etc.).
- List of contractor workers for PT SJA for the October 2022 period with a total of 340 workers. The contractors have included their workers in the *BPJS Ketenagakerjaan* and *BPJS Kesehatan* programs. The details are as follows:
  - Proof of payment for *BPJS Ketenagakerjaan* for the October 2022 period for 340 workers on November 10<sup>th</sup>, 2022 via Bank transfer.
  - Proof of *BPJS Kesehatan* payment for the October 2022 period for 330 workers and 606 dependents on November 10<sup>th</sup>, 2022 via Bank transfer. There is a difference of 10 people who are not paid by *BPJS Kesehatan*. Based on the results of interviews with PT SJA administration staff, information was obtained that the 10 workers had only been recruited at the end of October 2022, so their participation in the *BPJS Kesehatan* program was still at the registration process stage.

Based on the results of interviews with PT SJA's contractors, information was obtained that once a year the certification unit has carried out socialization related to OHS, compliance with labor regulations, environmental management, etc. to contractors and contractor workers. The unit of certification also conducts work evaluations on contractors as a form of compliance with the policies that apply in the company's operational area and the laws and regulations that apply in Indonesia.

Based on the description above, the unit of certification has its own clause regarding the fulfillment of relevant legal obligations, and can be proven by the third party concerned.

### 2.2.3

In the work agreement document with the contractor, it has been explained regarding compliance with applicable labor laws. For example, the second party (contractor) must comply with applicable labor regulations, especially those relating to the payment of wages and the age of the worker, which must be over 18 years of age. Then, based on interviews with contractors, it is known that contractor representatives can explain related to several prohibitions in accordance with labor laws such as prohibitions on the use of underage labor, forced labor and human trafficking.

As a form of compliance with the implementation of the clause contained in the work agreement, the unit of certification evaluates the performance of the contractor indicated in the Contractor Inspection Form Number F/SMART/UMUM/SADV/006/001 and the Contractor Evaluation and Recommendation Form number F/SMART/UMUM /SADV/006/002. The criteria assessed in the evaluation are work environment, emergency response, work equipment, work in hazardous areas (height, confined space and heat), business ethics, contractor quality and performance criteria, timely completion of work, compliance with labor regulations, obedience implementation of OHS, housekeeping and compliance with environmental regulations. For example, the PT SJA contractor evaluation form document with work agreement letter number 006/BWM/JKTO-V/XII/2021-ATBS for the assessment period on October 31<sup>st</sup>, 2022, received good marks so that the certification unit recommended that it be included again in the next work.

From the explanation above, it can be concluded that all contracts have their own clauses that prohibit practices involving child labor, forced labor, and workers from human trafficking.

**Status: Comply**

## 2.3

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

### 2.3.1

The unit of certification has informed all FFB received by the factory. both certified and non-certified. Supplier data has also been equipped with geolocation information, land ownership status to plantation addresses, for example:

- Certified

- Supplier: Kijang Kencana Plasma
- Code: KJNP
- Address: Sekijang Village
- Status: Certified
- Coordinat point: 0°51'17.013"N and 101°05'27.895"E
- Land ownership status: *SHM*
- Type of certification: RSPO (Certificate number = MUTU-RSPO/032, Valid date = October, 30<sup>th</sup> 2018 until October 29<sup>th</sup>, 2023) and ISCC (Certificate number = EU-ISCC-Cert-ID218-20220008, Valid date = February 1<sup>st</sup> 2022 until January 31<sup>st</sup>, 2023)
- Non-Certified:
  - Supplier: Jondris Pakpahan
  - Code: SBTX
  - Address: Kandis Sub distric, Siak Distric
  - Status: Non-Certified
  - Coordinat point: 0°51'37,1"N and 101°02'41,4"E
  - Land ownership status: *SHM*

### 2.3.2

From the recorded data on FFB receipts for the 2021/2022 period, it is known that the company received FFB from collectors in the name of Jondris Pakpahan. The company is able to show location and land ownership data for FFB origins that are received by each of these collection agents, here are some examples:

Collector	Smallholder Name	Land Rights	Location	Coordinate Location
Jondris Pakpahan	Darwin Simarmata	SKT	Pantai Cermin Village	Latitude: 00° 40' 31.8" & Longitude: 101° 08' 12.5"
	Ahmad	SHM	Pelambaian Village	Latitude: 00° 44' 5.1" & Longitude: 101° 04' 29.7"
	L. Br. Siahaan	SHM	Pelambaian Village	Latitude: 00° 43' 53.4" & Longitude: 101° 06' 20.0"

There are 109 suppliers indirectly sending FFB to these collectors with complete information regarding geolocation, address and land ownership status. In terms of calculation, the total FFB sent also corresponds to the number of existing suppliers.

**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 CH has a management plan in the 2019 – 2023 projected work plan and budget document for PT. BWL Kijang POM. The document discusses plantation operational targets, factory operations of PT. BWL, CPO production, PK production, budget plans and revenue budget plans for 2019 – 2023. For example, PT. BWL Kijang Estate has set a FFB production target for 2022 of 4,319 Tons and in 2023 it will remain 4,319 Tons. The CPO production target at Kijang POM in 2022 is 20,407 tons and in 2023 it will decrease to 12,059 tons. This decrease in production is due to the operational area which is the supply base for Kijang POM, which is in the replanting stage.

Based on the description above, it shows that the company already has a timed management plan

#### 3.1.2

The CH unit shows the replanting plan document for the Kampar Region for the period 2021 – 2030 which contains the replanting plan for KJGE, namely in 2022 the replanting area is 316 ha and in 228 the replanting area is 23 Ha. In addition, the certification unit shows the Kijang Plasma replanting program which consists of 8 KUD made on June 3 2022 and has been approved by all KUD management,



Plasma Manager and RC Kampar Plasma, as follows:

DIV	KUD	Area (Ha)	2022	2023	2024	2025	2026
1	Makarti Buana Jaya	1,011.00				1,011.00	
2	Berkat Ridho	700.00	150.00	550.00			
3	Kijang Mas	774.00		774.00			
4	Makmur Sejahtera	1,270.00			1,270.00		
5	Panca Warga	1,224.80				440.00	785.00
6	Budi Karya	999.00					999.00
7	Lestari Jaya	1,022.00			1,022.00		
8	Manunggal Abadi	1,146.99			879.00	143.00	
	<b>TOTAL</b>	<b>8,147.79</b>	<b>150.00</b>	<b>1,324.00</b>	<b>3,171.00</b>	<b>583.00</b>	<b>1,784.00</b>

The certification unit shows an evaluation of the program and the realization of replanting in 2022, including a recapitulation of the replanting work at KJGE in 2022. In the replanting review record there are plans for chipping work, MB planting work and oil palm planting work in Division I, Division II and Division III which has been completed until November 2022 covering an area of 286.32 Ha

Based on the description above, it shows that the unit of certification has an annual replanting program that is projected for at least the next five years and is reviewed every year

### 3.1.3

The unit of certification shows evidence of periodic management reviews, including:

- Minutes of the 2022 KJGE coordination meeting which was held on October 23<sup>rd</sup>, 2022 which discussed efforts in the field to achieve Production
- Evaluation of replanting work, related to the progress and realization of MB planting, chipping work and oil palm planting work
- Records of OHS Committee meetings which are held every month and discuss OHS
- Financial audit report from the Public Accounting Firm for the 2021 book closing period with a fair opinion

Based on the description above, it shows that the unit of certification has carried out a management review within the planned time according to the scale and nature of the activities carried out.

**Status: Comply**

## 3.2

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

### 3.2.1

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

- Companies no longer use pesticides with the active ingredient paraquat.
- The company has implemented biological pest control in this case by using host plants and owls to reduce the use of pesticides, especially insecticides and rodenticides.
- Management and monitoring of fires in the company's border areas that benefit the community.
- Use of renewable energy in accordance with reduced use of fossil fuels, including implementing a Biogas plant
- Waste management and monitoring through WWTP pool management, effluent quality testing and reporting to the Environmental Agency.
- Management and monitoring of air quality through several actions such as road maintenance, air quality testing, routine vehicle and engine maintenance and vehicle upgrades.
- Management and monitoring of surface water and ground water through testing of quality standards.
- Management of Greenhouse Gases and use of land clearing with a mechanical policy and no burning.
- Drilled wells to meet the needs of clean water provided for each of the 2 houses.
- Routine health checks conducted every 6 months.
- There is an application of finger print technology for attendance.

Based on the description above, it shows that the unit of certification already has evidence of the implementation of an action plan for



continuous improvement by taking into account social and environmental impacts and opportunities.

### 3.2.2

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

Status: Comply

## 3.3

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

### 3.3.1

The CH already has operational procedures which include SOP for Agronomy and Palm Oil Mills. The agronomy procedure regulates land clearing, oil palm seeding, planting of *Leguminosae cover crops* (LCC), oil palm planting, fertilizing, weed control, harvesting, pest control, pesticide handling, maintenance of boundary markers, pesticide management, and application of EFB. The procedures at POM include laboratory procedures, operating procedures for maintenance work tools, factory production procedures and warehouse procedures. In addition, the unit of certification already has SOP for Identification and Traceability of Certified Products (SOP/SMART/CERS-EHSD/SADV/I/001) which was ratified by the Head of Upstream on July 1<sup>st</sup>, 2014. In practice, the unit of certification refers to all SOP and internal policies. others that have been approved and disseminated to all existing units.

Based on the description above, it shows that the company already has Standard Operating Procedures (SOP).

### 3.3.2

The unit of certification has a mechanism to check the implementation of procedures consistently, including in the Internal Audit Procedure Number SOP/SMART/UMUM/SADV/I/009 dated July 1<sup>st</sup>, 2014. The procedure explains that the unit of certification carries out routine plantation and factory operational checks, for example:

- Operational Internal Audit (OIA) conducts inspections of all certification units twice a year with the scope of bank cash administration, receivables, demand deposits, non-plant fixed assets, plant maintenance and plantation areas, wage crop production and employee inspection.
- Sustainability audit activities conducted by the Sustainability Department
- Checking the suitability of work procedures carried out by the contractor is carried out at the time of submission of the payment stage.

Based on the description above, it shows that the company already has a mechanism to check the implementation of procedures consistently.

### 3.3.3

The CH has records of monitoring and follow-up carried out on the results of studies and evaluations of plantation and factory operations. Some of the monitoring records and follow-up improvements include operational improvements related to the quality of FFB sent to the factory, maintenance at each station in the processing of FFB at the factory to minimize losses, recapitulation of work accident reports which are carried out routinely once every 1 month, forming a preparedness and response structure emergencies to anticipate emergency situations, establishing a OHS Committee structure responsible for occupational health and safety, placing OHS warnings and monitoring the updating of legal documents.

Based on the description above, it shows that the unit of certification has carried out monitoring and follow-up on the results of the evaluation of plantation and factory operations.

Status: Comply

## 3.4

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

### 3.4.1

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

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

Kijang POM certification unit is under PT Buana Wiralestari Mas, the company already has an Environmental Impact Assessment (EIA) document that covers all areas that fall within the scope of certification and can be proven based on the following documents:

- Environmental Impact Analysis (*ANDAL*) document in 1993 for Oil Palm Plantation of PT Buana Wiralestari Mas–Sikijang Estate with an area of  $\pm 13,000$  Ha on a reserve area of  $\pm 15,000$  Ha and processing plant with capacity of 60-ton FFB/hour. The document has been approved by Ministry of Agriculture based on decree number RC.220/889/B/V/1994 dated 19 May 1994.
- Environmental management planning document in the form of RKL-RPL 1995 which was approved by Ministry of Agriculture based on decree number 091/RKL-RPL/BA/IV/1996 on 30 April 1996.

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

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

Unit of certification has carried out Social Impact Assessment (SIA) which was carried out in 2010 by consultants on behalf of Tomi Hendartomo, Yosaphat Ardilla R. and Nazlya Syahputri. The SIA study was conducted in July 2010 with the scope of Naga Sakti Mill, Naga Mas Estate, Naga Sakti Estate, Kijang Mill, Kijang Mas Estate and Kijang Kencana Plasma. This study explains the impacts arising from plantation activities, including population, education, livelihoods, income, health, facilities and infrastructure, customs and culture of the village communities around the company, environmental management efforts in the social, economic and cultural fields by PT BWL and community perceptions of the existence and benefits of PT BWL. Social impact assessments are included as part of the complement of all environmental impact assessments. The assessment involved all affected parties, both internal and external stakeholders, including employees, trade unions, village heads around the plantations, local NGOs and plasma farmers with a total of 50 representatives of relevant stakeholders. Evidence of participation with affected parties is shown in the form of attendance at FGD meetings and photos during interviews. In addition, the SIA study has also been disseminated to villagers and stakeholders in the affected area with evidence of an invitation to socialization conducted on 28 July 2010. The report also contains a matrix of Social Management Plan and Social Monitoring Plan which contains recommendations for managing social impacts that have been implemented. identified.

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

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

Unit of certification has also conducted studies related to areas with high conservation value as evidenced by the 2010 HCV Study Results document conducted by company internally led by Norman Faried Mustakim (approved RSPO HCV Assessor). HCV studies were carried out simultaneously for the scope of PT RJP and BWL where for the HCV assessment carried out at PT RJP included Rama-rama Estate, and Ramabakti Estate with area of 6,990.95 ha and PT BWL covering Nagamas, Nagasakti, and Kijang Mas with coverage area of 12,574.55 ha with final document in February 2011. This study describes the impacts arising from plantation activities on the environment, social, and protected flora and fauna. The HCV assessment also involves several affected parties, both internal and external stakeholders. Evidence of participation with affected parties is shown in the form of attendance at FGD meetings and photos during interviews. In addition, the HCV assessment has also gone through the Peer Review stage which was conducted by Dwi

Rahman Muhtaman in October 2010. The report also contains Matrix for Management and Monitoring of High Conservation Value Areas which contains recommendations for management of all identified HCV areas.

Based on result of study of HCV identification document in 2011, information was obtained that impact assessment on HCV, biodiversity and RTE species carried out also included areas outside concession boundary. The HCV area based on results of study is 411.55 Ha with total area that is included in the scope of Kijang POM certification unit is 31.43 Ha which is located on Kijang Estate. The HCV area consists of protected areas for flora and fauna and riverbanks. Based on the verification of these documents, it can be concluded that all areas with high conservation potential and protected areas have been identified and their management recommended with reference to the relevant environmental management guidelines.

#### 3.4.2

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

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

Based on the results of the verification of Report of Management and Monitoring Implementation Semester I of 2022 for scope of Kijang POM in PT Buana Wiralestari Mas, it can be concluded that all management and monitoring parameters required in environmental document matrix has been implemented. Unit of certification has also evaluated every parameter of significant impact monitoring carried out as required in Decree of Environment Minister No. 45 of 2005, which includes evaluation of trends, evaluation of critical levels, and evaluation of compliance. Based on result of evaluation, it is known that there are several parameters that are not in accordance with the applicable quality standards, but results of interviews, document analysis and observations show there are no indications of environmental pollution in the area around the unit of certification, this is explained in each related indicator. The effectiveness of environmental management and monitoring can be seen from results of analysis and compatibility between management and monitoring plans and their implementation in the field. Several things can be concluded from result of review of Report of Management and Monitoring Implementation document for Semester I of 2022, including:

- Preventing soil, water, and air pollution by reducing the use of chemicals, managing waste properly and complying with proper waste disposal in each area.
- Carry out efforts to save the environment by protecting areas important for environmental sustainability such as river borders.
- Manage and monitor the impact of potential land and garden fires.
- Manage and monitor the quality of soil, air, water, and other disturbances.
- Utilizing solid waste from palm oil mills as a substitute for fertilizers and fossil fuels.

This can also be proven from the results of field visits to EFB storage areas, WWTP areas and Land Application areas as well as river border conservation areas. The result of interviews with community representatives around the unit of certification also stated that they did not feel any environmental impacts related to the unit of certification's operational activities. Unit of certification has also carried out environmental management in accordance with Management and Monitoring Plan Matrix by installing signboards for conservation areas, markings in the form of stakes and red paint for spray boundary areas and other chemical applications. Based on result of interview with sprayer and fertilization workers, they also stated that they were aware of the prohibition on the use of chemicals in the buffer zone marked in red. In addition, they do not use chemicals when they are close to water bodies such as canals, reservoirs or artificial ponds connected to rivers.

Unit of certification has also made Report of Management and Monitoring Implementation every semester which refers to environmental management and monitoring plan matrix. Environmental management reports are carried out every 6 months and submitted to relevant agencies, for example Report of Management and Monitoring Implementation of Semester I of 2022 which is sent to the Environmental Agency of Kampar Regency with proof of receipt dated 19 August 2022. Based on the results of interviews with the Environmental Agency regarding reporting on Management and Monitoring Implementation, the certification unit routinely does this and up to the time the audit was conducted there were no complaints or conflicts related to the environment from NGOs or local communities around the unit of certification.

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

SIA study results document in 2010 is used as a guide in the preparation of social impact management programs which are updated every 2 years, for example, Social Impact Management Plan 2021-2022 document including Kijang POM, Kijang Estate, and Kijang Plasma. The document contains several social programs, including the provision of regular social assistance for surrounding community, economic improvement through cooperation with companies, job openings, and improvement of community welfare through

plasma partnerships. Program planning is carried out based on results of Focus Group Discussion on 28 June-10 July 2021 conducted with stakeholders including the village community around the company as well as the results of the potential and risk analysis with evidence of documentation and attendance attached. The program is a general plan that will be implemented by the company based on the analysis of stakeholder needs and stakeholder mapping related to the company, either directly or indirectly. Thus, the planned program is directed as far as possible to strengthen the company's relationship, communication and cooperation with all stakeholders.

Unit of certification also evaluates Management Plan every year to monitor the progress of program management, for example, there are programs that need to be stopped, continued, or added. The evaluation of the management plan refers to results of social impact monitoring and management in 2020-2021 document which was carried out in September 2021, evaluation activity is also a reference in the preparation of the program for the 2021-2022 period. Based on the verification results of the Social Impact Monitoring and Management document in 2021-2022, it can be concluded that all activities listed in the 2020-2021 Social Impact Management Plan have been implemented. The document also includes social programs to avoid/mitigate negative social impacts, partnership programs for farmers, human rights, CSR programs, gender equality, education, and public health. Social impact monitoring and management plan has also identified the emergence of positive and negative impacts from replanting activities.

Based on result of consultation with workers' representatives, there is no form of discrimination against workers, no underage workers were found, unit of certification has also fulfilled the rights of its employees. Unit of certification has provided several critical facilities for employees such as housing, water, electricity, places of worship, public facilities, educational infrastructure (schools), and other facilities. Unit of certification also allocates resources for maintenance of entire facility. The resource persons also stated that they could voice their views through their representative institution or a spokesperson they choose in the evaluation activities to review and develop mitigation plans and monitor the success of the implemented projects.

Based on the results of field visits and external stakeholder interviews related to management of social impacts carried out by unit of certification for period of 2022, it can also be concluded that there are no issues related to social impacts that have not been identified by the company. All potential social impacts have been managed and included in the management plan, which is still being managed as for example:

- Regarding the decline in health quality due to road dust. The management carried out by the company includes socializing the speed limit involving the company, Cooperative, Village Government to CPO truck drivers and Cooperative FFB vehicle transportation as well as adding warnings for a maximum speed limit of 25 Km/hour. The management of social impacts can be seen from the information on the results of the air quality test.
- Regarding pest attacks on community plants around the replanting area. The management carried out by the company includes making a buffer of 10 trees that are side by side with the community, providing information to representatives of the nearest community before/when replanting activities are carried out and installing pheromone traps 6 months before replanting activities (if needed, installed around community locations).

Participant for SIA adequate compare the unit of certification's operational activities. Based on interview with Kijang Jaya Village and Tanah Tinggi Village known that SIA, as well as management and monitoring plan has been conducted in participatory manner with all affected village with questionnaire method. This has been in accordance with result of SIA questionnaire documents showed by the company which has been held in September 2021. The participant for SIA adequate compares their operational activities because this activity has been attended by representatives from affected parties such as village representatives as well as internal company employees, namely gender committee, labor union, residents in employee housing area, and villages around the plantations and mills such as Villages of Kijang Makmur, Berkat Ridho, Kijang Jaya, Tebing Lestari, Tapung Makmur, Tandan Sari, Tanah Tinggi, Gerbang Sari, Kijang Rejo, Pelambaian, Sekijang , etc.

### 3.4.3

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

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

Unit of certification involves Environmental Agency and Ministry of Environment and Forestry to monitor the results of environmental management that has been carried out by unit of certification in the form of presenting Report of Management and Monitoring Implementation and other environmental management documents sent every certain period which can be proven in indicator 1.1.2. Unit of certification also does not block access to all environmental agencies if they are going to carry out field verification to their management areas. It aims to obtain advice and advice in carrying out environmental management in accordance with the vision,

mission and government programs so that they can run synergistically. This can be proven based on the results of an interview with the Environmental Agency of Kampar Regency who conducted a field visit in First Quarter of 2022 to conduct a study related to the process of preparing environmental documents. Monitoring and updating related to environmental impact management is also carried out in conjunction with an evaluation of HCV management which is described in more detail in indicator 7.12.4. However, in general, all recommendations from the participatory evaluation of HCV management will be carried out in line with environmental impact management and monitoring.

Based on document review result of Report of Management and Monitoring Implementation Semester I of 2022, environmental monitoring has been conducted based on environmental management and monitoring plan which had been made. Environmental parameters such as ambient air, emission air, and water consumption, have met quality standards set out in the applicable regulations. There is only water quality monitoring result which was that are not in accordance with the applicable quality standards, namely Government Regulation Number 22 of 2021 class 2. Unit of certification carried out surface water tests at 2 sample points, namely upstream and downstream of the Sialangkalo River. Parameter that are not in accordance with the quality standards is BOD and COD upstream of Sialangkalo River. This has been discussed in document of *ANDAL* in 1993 which is stated that this matter happens due to value originating from the upstream of the river is not in accordance with the quality standard. Besides, based on the analysis of the Landsat map, it can be seen that the upstream part of the river has been dominated by oil palm plantations and community settlements. Unit of certification stated that to reduce the pollutant load that enters their management area, Vetiver Grass and Guatemala Grass are planted to reduce the rate of infiltration of pollution into water bodies.

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

Based on analysis of Social Impact Management and Monitoring document in 2021-2022, social impacts in this assessment are divided into positive and negative impacts. The social impact assessment is carried out based on perceptions of community representatives at assessment location who represent community. Unit of certification has analyzed positive and negative impacts arising from each activity specifically, for example physical assets for production activities that have positive and negative impacts on both external and internal levels, and so on as described in indicator 3.4.2. Unit of certification conducts annual evaluations to harmonize data collection related to community perceptions regarding the SIA Management Plan and adjust it to the latest needs according to conditions in the field.

Social Impact Management and Monitoring Plan has also been evaluated and updated annually by involving affected stakeholders. Unit of certification can show evidence that has carried out by evaluation through Social Impact Study Review document on SIA Management Plan for 2020-2021 period which was carried out on 23-31 August 2021. Based on results of the verification of document, it shows that all social management and monitoring plans have been implemented and monitored and then updated periodically in a participatory manner to accommodate the aspirations of stakeholders. The evaluation activity was also carried out to prepare the SIA program which will be carried out for the next years, namely the 2021-2022 period.

In the annual review, unit of certification applies 7 principles of RSPO regarding plantation development that is responsible for social and environmental aspects by referring to Free, Prior, Informed and Consent (FPIC) Principles. The principle of FPIC which is the basis for unit of certification in carrying out the process of developing oil palm plantations, among others, involves women's representatives, customary leaders, land owners around the company's area, plasma and independent smallholders, as well as all affected parties. Based on the explanation above, it can be concluded that the company has made efforts to update the social and environmental management program periodically with clear and accountable evidence.

<b>Status: Comply</b>
-----------------------

## **3.5**

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

#### **3.5.1**

The unit of certification has procedures for recruitment, promotion, retirement and termination of workers as stipulated in the "Work Environment and Industrial Relations Policy" which was ratified on August 1<sup>st</sup>, 2017, by MD HR, MD Operations and MD Sustainability. The document contains 21 policies that apply to the company, for example:

- Manpower Recruitment No. KHI-smart/001-00
- Employment Agreement/Contract No. KHI-smart/002-00
- Work Performance Assessment No. KHI-smart/009.00
- Promotion and Transfer No. KHI-smart/010-00



- Industrial Relations Dispute Settlement No. KHI-smart/021-00

In addition, the certification unit has a Collective Labor Agreement (CLA) for the 2018 – 2020 period which was ratified on July 4<sup>th</sup>, 2018, by BKS-PPS and FSP.PP-SPSI. The document describes all regulatory aspects related to employment, such as: requirements for recruitment, promotion, retirement, termination of employment, and other provisions. The CLA document above is available in Indonesian. In connection with the end of the CLA for the 2018 – 2020 period in the Provinces of NAD, North Sumatra, Riau and Jambi, currently the negotiating team consists of BKS-PPS and FSP.PP-SPSI have held negotiations 5 times where the last negotiation was held on January 11<sup>th</sup>, 2022. Based on a letter from BKS-PPS number 88/BKS-PPS/2022, it is known that currently the CLA for the 2022 – 2024 period is in the process of being registered with the Indonesian Ministry of Manpower so that the negotiating team agrees that the CLA for the 2018 – 2020 period is still valid as long as the new CLA has not been declared valid.

The unit of certification also owns the GAR Social and Environmental Policy (GSEP) which was endorsed on September 8<sup>th</sup>, 2015 by the Head of Upstream, CEO Down Stream & Commercial, Executive Director & CFO and MD of Sustainability & SSE. In point 3 of the policy, it is explained regarding the work environment and industrial relations. In responsible employment practices, companies prohibit the practice of imposing recruitment fees and withholding identity documents, provide work contracts in languages that all workers can understand, and provide equal opportunities for all workers without discrimination at all stages of the employment relationship.

### 3.5.2

The unit of certification has been always documented all labor procedures that have been carried out properly such as recruitment, promotion, performance appraisal, and others. Following are some examples of labor procedures that have been implemented and well documented by the company, for example:

- Recruitment of workers
  - KJGM: Workers with the initials BDAW were accepted to work as weighbridge administration in August 2022 with work agreement letter number 002/KJGM/PKWT/08/2022.
  - KJGE: Employees with the initials DWT are accepted to work as workers with the unit yield quota on October 10<sup>th</sup>, 2022, with work agreement letter number 139/KJGE/PKWT-SH/10/2022.
- At the recruitment stage, these workers have been selected based on the applicable procedures, namely through the stages of administrative selection, medical examinations, interviews and psychological test results. Then, the certification unit also shows supporting evidence documents that have provided one copy of the work agreement document to the worker. This is indicated in the receipt document for submission of a copy of the work agreement letter. Based on the results of interviews with workers, the certification unit has provided a copy of the work agreement letter document at the start of hiring.
- Employee performance appraisal document with the initials WLY at the KJGE unit for the 2021 assessment period which provides information regarding the assessment criteria (discipline, work quantity, work quality, cooperation, initiative, responsibility, motivation, understanding of tasks, self-adjustment, leadership, problem solving and decision making), the results of the assessment and follow-up of the results of the assessment. Then the certification unit shows a Promotional Decree with the initials WLY Number 001/KJGE/SK/06/2022 issued on June 1<sup>st</sup>, 2022. The worker is promoted from PT2-J2 class to PT1-E1 class.
- Termination of employment for workers with the initials MT based on decision letter number 002/BWLM-KJGM/PHK/VIII/2022 on July 25<sup>th</sup>, 2022. The letter explains that the unit of certification terminates employment of employees for disciplinary reasons.

The explanation above proves that the unit of certification has implemented work procedures properly and documented for each employee.

**Status: Comply**

### 3.6

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

#### 3.6.1

The CH shows the results of risk identification in KJGM, KJGE and KJNP. For example, there is a Hazard Identification and Risk Assessment document at KJGE which was compiled on November 2<sup>th</sup>, 2022. In this document, all potential hazards have been



identified in all units, identification of existing obstacles, initial risk analysis, risk control plan and subsequent risk analysis by the OHS Committee Secretary who has a General OHS Expert certificate. The document describes hazard identification at each station or activity, such as transportation, security, weight bridge, FFB grading, loading ramp, transfer carriage, sterilizer, hoisting crane, thresher, press, clarification, boiler, kernel, engine room, water treatment, effluent, workshops, warehouses, archives warehouses, Toxic and Hazardous material and Toxic and Hazardous waste warehouses, diesel tanks, laboratories, offices, CPO dispatch, installation of machine units, firefighting, vehicle traffic within the factory and others. The results of the identification are in the form of sources/events, impacts, existing controls, initial risk analysis (level of possibility, severity and level of risk) and accepted/unaccepted risks. Hazard Identification and Risk Assessment in KJGM has covered all operational activities in the field.

The unit of certification has conducted socialization regarding this company policy to employees and stakeholders including on March 14<sup>th</sup>, 2022 at the KJGM Office which was attended by 25 people. In addition, based on interviews with sorting employees, it is known that the unit of certification also conducts socialization related to OHS during the morning assembly before the start of work

Based on the description above, it shows that the company has assessed the risks and identified OHS problems in all parts of the certification unit

### 3.6.2

The certification unit monitors the effectiveness of the implementation of the OHS plan which is carried out to manage OHS risks for employees, including by evaluating the implementation of the OHS program, repair and maintenance programs in plantations and factories, inspections for compliance with the use of PPE which are carried out every month, monitoring the health status of employees through special health checks and periodic health checks. For example, there are periodic health checks at KJGM on 3<sup>rd</sup> and February 10<sup>th</sup>, 2022 and special health checks on August 16<sup>th</sup>, 2022. In addition, the unit of certification routinely makes quarterly OHS reports including the OHS Committee report which is reported to the Office of Manpower and Transmigration once every 3 months, the CH also routinely conducts OHS Committee meetings once a month to evaluate plans and realization of work programs in plantations and factories.

Based on the description above, it shows that the company has monitored the effectiveness of the OHS plan to deal with OHS risks to its employees.

**Status: Comply**

## 3.7

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

### 3.7.1

The unit of certification has identified and developed a training program related to the aspects of the RSPO P&C for all staff, workers, smallholders and local stakeholders in 2022. The following is the result of the identification and training program plan listed in the Personal Competency Identification Matrix document and the Program and Realization of Training Activities in 2022, including:

- HCV, integrated pest management, LSU and SSU training for plantation workers.
- Training for operators, technicians, general OHS, welders, electricians for factory workers.
- Understanding of RSPO, ISPO, ISCC, OHS and GHG.
- Socialization regarding SOP, GSEP, PPE, first aid, HIRAC, emergency response procedures, fire extinguisher, hazardous and toxic materials and hazardous and toxic waste control and their handling handling for contractor worker, smallholders and stakeholder.

### 3.7.2

The unit of certification shows the minutes document for the realization of the training program in 2022, for example:

- LSU, SSU and IPM training which will be held on February 8<sup>th</sup>, 2022, at the KJGE unit.
- HIRAC socialization which was held on January 10<sup>th</sup>, 2022, at the KJGE unit.
- Hazardous and toxic waste operator training which was held on May 29<sup>th</sup>, 2022, at the KJGM unit.
- Socialization of OHS chemical officers which was held on June 23<sup>rd</sup>, 2022, at the KJGM unit.
- Fire prevention training and GSEP outreach to plasma farmers held on February 11<sup>th</sup>, 2022.
- Socialization of GSEP to contractor workers which was held on February 18<sup>th</sup>, 2022.

Based on the results of interviews with workers, plasma smallholders and contractors, it is known that every year the company organizes training and outreach programs to all parties around the company. Implementation of GSEP socialization to contractors, for example, has been understood and implemented, such as involving contractor workers in the BPJS program, providing PPE, not using

child labor and applying the minimum wage that applies in Kampar Regency.

Based on the description above, the unit of certification has proven that there are training activities for all staff, workers, plasma smallholders and stakeholders. Records of the training activities have been maintained in the minutes document.

### 3.7.3

UoC showed that they had properly documented every training activity and socialization that had been carried out to all workers, contractors, and related stakeholders. The training of SCCS had been conducted on June 30<sup>th</sup>, 2022, for weighbridge operator, laboratory, and admin. Based on the interview with all workers involved in supply chain operations, such as security (for FFB receiving verification), weighbridge operator, and the PIC related to supply chain, they have been understood the supply chain mechanism, and the MB record has conducted and monitored quite well.

Status: Comply

## 3.8

### Supply Chain Requirements for Mills

#### 3.8.1; 3.8.2

Kijang Mill was used RSPO supply chain of Mass Balance module because mill received certified dan uncertified FFB.

#### 3.8.3

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

	Last Year Projected Certified Volume (MT)	Actual production in last 12 months (MT)	Estimation for the next 12 months
FFB Processed (Estate + Scheme)	221,000	210,675.97	218,850
CPO Production	43,000	37,857.21	41,600
Palm Kernel (PK) Production	12,500	11,387.35	11,400

#### 3.8.4

The Mill have been registered in RSPO Palm Trace as Kijang Palm Oil Mill – PT Buana Wiralestari Mas Tbk with License ID CB134137, and Member ID RSPO\_PO1000001060.

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 4,676.23 MT and there's CSPO sold as physical as amount as 14,134.39 MT.

The auditors verify related to transactions on the Palmtrace platform with actual sales of certified products, for example of transaction record in 12 July 2022, where there was a sale of CSPO with amount 302.52 ton to PT Ivo Mas Tunggal and this was in accordance with the transactions made at RSPO Palmtrace.

#### 3.8.5

Kijang Mill had procedure for SCCS with MB or IP model in SOP of FFB Processing (No. SOP/SMART/MCMD/II/TM-PKS), SOP of Reporting of Certified Product (No. SOP-SMART/CERS-EHSD/SADV/003), and SOP of Document and Record Controlling (No. SOP/SMART/UMUM/SADV/II/001). The company's procedures have been revised in accordance with the latest RSPO SCCS system reference (Revised 01 February 2020).

Auditors conduct interviews with workers who are responsible for the delivery of certified products, namely weighing operators. Operators are able to explain the technical acceptance of certified FFB, sales of CPO/PK and also the reporting mechanism if there is an error in recording information.

#### 3.8.6

The Procedure to conduct annual internal audit are describe in SOP for internal audit No. SOP/SMART/UMUM/SADV/II/009 issued on 1 July 2014 covering all audit for sustainable palm oil including SCCS. In the SOP mentioned that internal audit is done annually. Internal audit of SCCS conforms to the requirements in the RSPO SCCS and the RSPO market communications and claims documents and effectively implements and maintains the standard requirements.

Internal audit was held on 18 – 22 July 2022 for all business unit (Estate and Mill) and there is no non-conformity related to supply chain indicators.

### 3.8.7

Kijang Mill received FFB from certified and uncertified sources, here's the detail:

Month	FFB (KG)		
	RSPO Certified	Non-Certified	Total
Nov-21	18,230.53	6,242.08	24,472.61
Dec-21	19,063.37	7,263.34	26,326.71
Jan-22	18,232.39	4,205.82	22,438.21
Feb-22	13,811.85	1,136.50	14,948.35
Mar-22	16,592.52	856.77	17,449.29
Apr-22	17,610.49	2,320.15	19,930.64
May-22	17,596.40	1,141.03	18,737.43
Jun-22	18,987.43	6,170.34	25,157.77
Jul-22	16,184.09	4,601.93	20,786.02
Aug-22	18,924.35	4,116.13	23,040.48
Sep-22	17,772.89	4,034.60	21,807.49
Oct-22	17,669.66	2,488.85	20,158.51
<b>Total</b>	<b>210,675.97</b>	<b>44,577.54</b>	<b>255,253.51</b>

The auditor has verified FFB received records for the license period, the total FFB certified received was 210,675.97 MT.

### 3.8.8

The company shows documentation of certified products, such as sales contracts, shipping announcements, delivery orders, etc. These documents explain the name and contact person of the buyer and seller, date of delivery, product description, RSPO Certificate ID, quality, quantity, member ID, and others. The transaction also including RSPO certificate number, such as evidence of transaction record of CSPO in 12 July 2022 with information:

- Quantity : 25,199 kg
- Certificate ID : MUTU-RSPO/013-22070867 /RSPO MB
- Time : 13:32 WIB
- Weighbridge Card : M194 NSAM M 118876
- Driver : H. Marussari
- No. Police : BM 9984 FJ
- FFA : 4.00
- DO No. : 2051/CPO/2051/22/TO45

Based on document review and interview with management representative, the company sold CSPK and CSPO physically.

### 3.8.9, 3.8.10, 3.8.11

The physical handling of product are conducted by mill itself since FFB receive in grading station and processed to CPO and PK, except the transportation of product and storage tank at bulking are sourced to third party, which bonded by the agreement. Currently, there is 1 contractor for CPO and PK transport, for instance as shows through several Work Order Letter as follows:

- PT Satrindo Jaya Agropalma (CPO transporter), agreement No. 004/BWL/KJGM/01/2020-CPO dated 2 January 2020 valid thru 31 December 2022.
- PT Satrindo Jaya Agropalma (PK transporter), agreement No. 013/IMT/LIOK/02/2020-PK dated 3 February 2020 valid thru 31 December 2022.

Based on the review of the agreement documents, there is also a clause whereby the carrier can be inspected at any time by the certification body.

From these data, there was no change in the contractor from the previous assessment, which was still under the name PT Satrindo Jaya Agropalma.

### 3.8.12

Kijang Mill has record of all CSPO and CSPK information, as well as presented in the table bellows:

#### Crude Palm Oil

Period	CPO Production (MT)		CPO Delivery (MT)			Stock	
	Certified	Uncertified	Certified (Physical)	Other Scheme	Conventional	Certified	Uncertified
Stock Opening						423.12	408.48
Nov-21	3180.88	1094.22	3455.44	-	1201.39	149.00	301.00
Dec-21	3437.84	1291.36	3113.18	-	1191.62	474.00	401.00
Jan-22	3228.48	750.76	3127.00	-	1092.80	575.00	59.00
Feb-22	2476.48	194.76	2418.34	324.05	198.14	309.00	56.00
Mar-22	2946.57	150.77	2904.72	-	151.27	351.00	55.00
Apr-22	3294.41	325.82	2900.08	-	123.44	745.00	257.00
May-22	3201.41	178.00	2641.52	-	297.58	1305.00	137.00
Jun-22	3376.97	1026.47	3690.16	-	324.34	992.00	839.00
Jul-22	2919.09	806.71	3323.71	-	1425.08	587.00	221.00
Aug-22	3436.67	708.53	2823.08	-	473.49	1201.00	456.00
Sep-22	3150.25	713.32	3365.22	149.75	920.46	836.00	249.00
Oct-22	3208.16	412.94	599.86	3151.81	401.78	292.00	260.00
<b>Total</b>	<b>37,857.21</b>	<b>7,653.66</b>	<b>34,362.31</b>	<b>3,625.61</b>	<b>7,801.39</b>		

Based on record verification, there's CSPO sold as certified product on license period as amount as 34,362.31 MT.

#### Palm Kernel

Period	PK Production (MT)		PK Delivery (MT)			Stock	
	Certified	Uncertified	Certified (Physical)	Other Scheme	Conventional	Certified	Uncertified
Stock Opening						255.00	123.00
Nov-21	965.28	327.73	1021.12	-	350.65	199.16	100.08
Dec-21	1080.12	408.21	1137.30	-	294.49	141.98	213.80
Jan-22	1019.07	254.35	959.86	-	429.38	201.20	38.77
Feb-22	764.08	58.81	813.07	-	-	152.20	97.58
Mar-22	877.66	44.16	884.57	-	-	145.29	141.73
Apr-22	1008.63	125.73	964.60	-	140.35	189.32	127.11
May-22	900.85	59.19	947.02	-	35.85	143.15	150.45
Jun-22	903.41	318.89	832.09	-	142.91	214.47	326.43
Jul-22	849.66	234.58	825.62	-	417.87	238.51	143.14
Aug-22	1045.93	217.16	1111.01	-	148.77	173.42	211.53

Sep-22	970.28	212.22	864.04	-	333.31	279.66	90.44
Oct-22	1002.38	129.85	1043.47	-	18.95	238.58	201.35
<b>Total</b>	<b>11,387.35</b>	<b>2,390.88</b>	<b>11,403.77</b>	<b>-</b>	<b>2,312.53</b>		

Based on record verification, there's CSPK sold as certified product on license period as amount as 11,403.77 MT.

### 3.8.13; 3.8.14 & 3.8.15

The mill has been defined the extraction rate dividing CPO or PK production by the total FFB process. Based on that explanation, extraction rate calculated by industry average. The implementation based on company procedures (MCMD clause II). The sounding process for quantity product calculation done by head of administration (KTU) every morning.

### 3.8.16

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

- Member Name: Kijang Palm Oil Mill – PT Buana Wiralestari Mas Tbk
- Membership No.: 1-0096-11-000-00 (Golden Agri-Resources Ltd)
- Member ID: RSPO\_PO1000001060
- License ID: CB134137

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 4,676.23 MT and there's CSPO sold as physical as amount as 14,134.39 MT (June 2022 to November 2022).

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

- In 11 - 12 July 2022, where there was a sale of 302.52 ton (12 times transport) of CSPO with details of recordings of weighing cards on that date to PT Ivo Mas Tunggal, and this was in accordance with the transactions made at RSPO Palmtrace. Where, the shipping announcement was made on 13 July 2022 and confirmed by the recipient on 7 August, 2022.
- In 1 - 2 August 2022, where there was a sale of 56.24 ton (3 times transport) of CSPK with details of recordings of weighing cards on that date to PT Ivo Mas Tunggal (KCP Libo), and this was in accordance with the transactions made at RSPO Palmtrace. Where, the shipping announcement was made on 6 September 2022 and confirmed by the recipient on 21 September, 2022

### 3.8.17

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

Based on management representative interview and document review, the mill does 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 unit of certification has made a policy to respect human rights which is indicated in the document:

- The GAR Social and Environmental Policy (GAR Social and Environmental Policy/GSEP) which was endorsed on September 8<sup>th</sup>, 2015, by the Head of Upstream, CEO – Downstream & Commercial, Executive Director & CFO and Managing Director of Sustainability & Strategic Stakeholder Engagement.
- Sinarmas Agribusiness and Food's Business and Human Rights Policy which was ratified on December 12<sup>th</sup>, 2019, by the Head of Policy and Compliance Division.

In both policies it is stated that the certification unit is committed to human rights for all workers, contractors, indigenous peoples, surrounding communities throughout the company's operations. This policy is publicly available on the unit of certification website in two languages (Indonesian and English) and has been communicated to all workers and local stakeholders. For example, the socialization of the human rights policy at the KJGE unit on June 20<sup>th</sup>, 2022. This policy has also been socialized to external stakeholders, for example to contractor workers on February 18<sup>th</sup>, 2022.

Based on the results of interviews with representatives of trade unions, the gender committee and representatives of the Tanah Tinggi and Kijang Jaya villagers, it is known that there were no incidents of human rights violations in the certification unit, no employees were intimidated and/or subjected to violence by the certification unit.

#### 4.1.2

The unit of certification does not have records related to the use of force/mercenaries/paramilitary in resolving conflicts/problems that exist between the unit of certification and related stakeholders (local community, workers, or others). This has been stated in the GAR Social and Environmental Policy (GSEP) which was approved on September 8<sup>th</sup>, 2015, by the Head of Upstream, CEO – Downstream & Commercial, Executive Director & CFO and Managing Director of Sustainability & Strategic Stakeholder Engagement. Point 2.1.2 explains the achievement of responsible conflict resolution. The policy also states that companies refuse to use violence in disputes with any party.

Based on the results of interviews with representatives of trade unions and representatives of the gender committee as well as with external stakeholders, it is known that the certification unit does not use paramilitaries or mercenaries in the company's operational areas. If there are problems, they will be resolved by way of deliberation without using violence. Solving conflicts/problems using this deliberation has been quite effective.

**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 unit of certification has SOP for Handling Complaints and Dissatisfaction No. SOP/SMART/SUST/IV/003 which was ratified on February 14<sup>th</sup>, 2022 by the Head of Upstream. In Chapter 4, point 4.6.1 letter b, it is stated that "The company guarantees the anonymity of the reporter and whistleblower with the aim of reducing the risk of retaliation". The procedure explains that the steps for submitting complaints verbally and/or in writing are addressed to the management leadership. Maximum response to workers is 2 weeks if the verification of complaints and conflicts submitted takes more than 14 working days from the time the complainant submits the complaint and conflict, the EM/MM can provide an initial notification letter as a response to the trial and conflict. The SOP also states that the identity of the reporter and reporter will be kept confidential if necessary.

The certification unit has recapitulated all complaints and conflicts submitted by all affected parties around the certification unit in the Complaint and Conflict Handling Recapitulation Form Number F/SMART/SUST/IV/003/004. Based on the results of the document review, it is known that during 2022 there were no complaints or conflicts reported to PT Buana Wiralestari Mas.

The results of interviews with workshop workers at the KJGE unit, boiler station operators, plasma farmers, contractors (PT SJA) and representatives of the Kijang Jaya Village community, it is known that procedures related to complaints and conflicts have been periodically submitted to all parties. Dissemination related to handling complaints is also usually conveyed during the morning circle to all workers. Meanwhile, based on the statements of plasma farmers and stakeholders around the company, it is known that socialization related to routine complaint handling is carried out at least once a year.

The unit of certification also has a GAR Policy SOP Grievance which explains that if a complaint arises in the RSPO complaint process, GAR will handle the complaint in accordance with the RSPO process. From the description above, it can be concluded that the company has a system that regulates complaints and complaints to all parties.

##### 4.2.2

The unit of certification has established a system for handling complaints for all affected parties, which is documented in SOP for Handling Complaints and Dissatisfaction Number SOP/SMART/SUST/IV/003 which was ratified on February 14<sup>th</sup>, 2022, by the Head of Upstream. The procedure explains how to convey complaints or suggestions to all parties, including those who cannot read or write,



which can be conveyed orally through superiors. The certification unit through the Labor Union and the Gender Committee routinely holds meetings with workers, one of the agendas of which is to accommodate issues and complaints directed at the company. The certification unit also regularly holds meetings with external stakeholders such as local contractors, community representatives and related agencies, one of the agendas of which is to accommodate issues and complaints directed at the certification unit.

#### 4.2.3

Records of complaints from workers or stakeholders have been recorded by the unit of certification. This can be shown in the Grievance and Dissatisfaction Recording Form (Internal and External) Number F/SMART/SIGS-CSR/SADV003/001, it is known that during the one last year period there were no worker complaints or complaints from stakeholders to the certification unit.

Based on the results of interviews with workers in plantation and factory units, plasma farmers, contractors (PT SJA) and representatives of the Tanah Tinggi Village community, it is known that they understand the flow of submission if they have complaints to the unit of certification. They also stated that the unit of certification quickly responds to complaints submitted.

The unit of certification has also informed the progress of complaint handling to the parties, carried out in several ways such as through the Complaint and Dissatisfaction Recording Form (Internal/External) or with a representative of the unit of certification appointed as a liaison between the two parties who can conduct formal and informal meetings as well as communication in person or by telephone.

#### 4.2.4

In the SOP for Handling Complaints and Dissatisfaction SOP/SMART/SUST/IV/003 number which was ratified on February 14<sup>th</sup>, 2022, by the Head of Upstream. The procedure explains that the unit of certification is committed to actively promoting and supporting the responsible resolution of any conflict involving GAR's operations with the competent authorities in the event of a conflict. The reporter can choose a third party/mediator in conflict resolution. The system will include mapping all conflicts within GAR's operations, development of action plans to address identified conflicts, transparent monitoring and reporting.

Status: Comply

#### 4.3

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

Contributions to community development based on the results of consultations with local communities can be demonstrated by meetings between community representatives and the company in 2021 as the basis for CSR plans for 2022. Many program activities have been realized by the company in the 2021/2022 period, for example:

- Assistance to Elementary School 021 in Sekijang Village
- Road repair assistance to Sekijang Village
- Facilitator assistance and the needs of the Sekijang Village Basamo business group
- Help from the Batak City HKBP Church
- Food Package Assistance to Pelambaian Village
- Road Maintenance Assistance in Tapung Makmur Village and Tanah Tinggi Village.

One of the development contributions to the community is carried out by local purchases to shops around the company, cooperation with local contractors in plantation and factory management activities and the implementation of CSR activities which are arranged annually in the context of the welfare of the surrounding village communities.

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 has land rights in the form of HGU in accordance with Government Regulation no. 40 of 1996 on Document No. 1 year 1994 (2,284.74 Ha); No. 1 Year 1998 (80.00 Ha) and HGB No. 1 Year 2000 (4.65 Ha) to showing legal ownership with size 2,369.39 Ha. Scope of permitted area covers Kijang Mill and Kijang Mas Estate. Documents showing the actual legal use of the land available in audit site.

While, the land use for smallholder scheme of Kijang Kencana Plasma (associated scheme smallholders under PT Buana Wiralestari Mas management) as supply base to Kijang Mill with the total area 8,147.79 ha, with the number of Farmer group are 197 and number of farmers are 4,074 persons, as summarized following:

Cooperative	Unit Code	Village	Ha	Number of Farmer Group	Number of Farmer
Makarti Buana Jaya Bersama	MBJ	Kijang Jaya	1,011.00	21	506
Berkat Ridho Bersama	BR	Kijang Makmur	700.00	17	350
Kijang Mas Lestari	KM	Tebing Lestari	774.00	19	387
Sawit Makmur Abadi Sejahtera	MS	Tanah Tinggi	1,270.00	32	635
Panca Warga	PW	Gerbang Sari	1,224.79	32	611
Budi Karya	BK	Tandan Sari	999.00	25	500
Lestari Jaya	LI	Tapung Makmur	1,022.00	25	511
Tri Manunggal Abadi	MA	Tapung Lestari	1,147.00	26	573
<b>Total</b>			<b>8,147.79</b>	<b>197</b>	<b>4,073</b>

Land ownership status of smallholder scheme is individual land ownership rights (SHM) granted by the government program namely "transmigration program" since 1991. CH can shows the copy of land title of smallholder.

The average actual processing capacity for the past one-year period is still below the stipulated permit, which is below 60 tons/hour (Average 49.68 ton/hour).

#### 4.4.2

Based on latest assessment, no additions are made to the company's operations. Land clearing has been carried out previously before 1991. Land compensation documents along with the negotiations have been well documented in the D&L section stored in the Sumatra Utara Regional Office. the documents stored are, documents related to the process of land compensation, proof of payment, documentation of activities, to a participatory map between the seller and the company.

#### 4.4.3

The CH has had SOP related land identification and compensation (No. SOP/SMART/MCAR/I/TA-PPL, dated July 15<sup>th</sup>, 2020) which set land identification, calculation and compensation for land acquisition mechanism. In this procedure was explained that the process of land identification is involved the community and the village government.

Based on document review, known that previous land acquisition did not diminish community's legal rights. Based on land acquisition documents, known that the documents made in Indonesia language, has include the maps, price agreement, evidence of payment, and signed by both party as well as Village Officials. The latest land compensation has been conducted before 1991. Based on management interviews, it is known that the CH has no plans to expand the land by legal compensation for community.

#### 4.4.4; 4.4.5; 4.4.6

Based on latest assessment, there was no increase in the company's operational area. The last land compensation process was carried out before 1991. During the release of land, in general, the owner of the land acts as a representative for himself. Regular reviews of the FPIC process are embodied in the SIA document which functions to highlight the social issues of the affected people including land issues. All records were made in Indonesian, clear proof of payment and signed by both parties between the company and the land seller (local community) without coercion.

**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

Until latest assessment was implemented there was no expansion of the area or new planting. This was evidenced by the results of public consultations with the community and the absence of additional *GRTT* records before 1991. The certification unit can show land compensation documents which include informing about news. measurement program, master map of the compensation area, certificate of ownership, statement of relinquishment of land rights, map of the area to be compensated, receipts for compensation

payments. The documents for the compensation process have been signed by both parties and are known to local officials such as the village head, sub-district head and witnesses. Existing and well-documented agreements are one that the FPIC process has implemented.

Based on the results of interviews with representatives of surrounding Villages (Tanah Tinggi dan Kijang Jaya Village), there are no issues of dispute or other land issues with the company.

**Status: Comply**

#### 4.6

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

##### 4.6.1 & 4.6.2

The certification unit shows the Technical Guidelines for Land Preparation: Land / Land Compensation Document Number: SOP/SMART/MCAR/I/TA-PPL, dated July 15<sup>th</sup>, 2020. Procedures include explaining the land identification process, outreach to the community, physical inventory, to the compensation process.

Completeness of compensation payment documents: receipts, documentation, identification cards (*KTP*), minutes of land over and compensation, certificates of land ownership, statement letters, detailed maps of land and attendance lists of land measurements.

##### 4.6.3

Until the latest assessments were carried out there were no new GRTTs. The last land acquisition was carried out before 2000. There is FPIC Procedure No. SOP / SMART / SENS-CSR / SADV / I / 003, part 2.4 explains that identification of participatory maps related to legal ownership of the community takes into account gender, community leaders, local or transmigrant communities, ethnic groups, etc.

##### 4.6.4

Until latest assessment was implemented there was no expansion of the area or new planting. This was evidenced by the results of public consultations with the community and the absence of additional *GRTT* records out before 1991. The certification unit can show land compensation documents which include informing about news, measurement program, master map of the compensation area, certificate of ownership, statement of relinquishment of land rights, map of the area to be compensated, receipts for compensation payments. The compensation process documents have been signed by both parties and are known to local officials such as the village head, sub-district head and witnesses.

Based on the results of interviews with representatives of surrounding Villages (Tanah Tinggi dan Kijang Jaya Village), there are no issues of dispute or other land issues with the company.

**Status: Comply**

#### 4.7

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

##### 4.7.1 & 4.7.2

The land compensation process was completed by the company in 1991. There is FPIC Procedure No. SOP / SMART / SENS-CSR / SADV / I / 003, part 2.4 explains that identification of participatory maps related to legal ownership of the community considers gender, community leaders, local or transmigrant communities, ethnic groups, etc.

##### 4.7.3

As the results of public consultations with community representatives from surrounding Villages, one of the positive impacts of opening a company is the opening of road access. They stated that prior to the existence of the company, the community's access to interact with other areas was only through rivers. After the company exists, the community can access the company's roads for daily activities.

Representative of surrounding villages also stated that the company's existence also provided access to recruitment and use of local contractors.

Based on the results of interviews with representatives of surrounding villages (Tanah Tinggi dan Kijang Jaya Village), there are no

issues of dispute or other land issues with the company.

Status: Comply

#### 4.8

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

##### 4.8.1; 4.8.2; 4.8.3; 4.8.4

The certification unit has SOP for Social Conflict Handling Document No SOP / SMART / SENS-CSR / SADV / I / 002, dated 1 July 2014. The procedures include explaining the conflict information, conflict analysis, coordination of conflict handling, and preparation of reports on handling progress carried out periodically at least every one month.

Based on field observation, document review and public consultation with relevant stakeholder (National Land Agency, Tanah Tinggi dan Kijang Jaya Village), there's no issue related to land conflict.

The company's business land originally came from the forest area. The company has obtained a forest area release permit based on Minister of Forestry Decree No. 108/KPTS-II/1991 concerning the release of a portion of the Tapung Kanan river forest area of 23,312 hectares located in Kab. Kampar, Prof. Riau for plantation cultivation on behalf of PT. BWL dated 20 February 1991.

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

Based on an interview with the Manager Mill, the pricing is an agreement between the management of supplier and the FFB supplier. Pricing is fluctuated in accordance with the development of FFB prices and CPO prices on the world market.

Based on the results of interviews with the FFB supplier, it is known that the company always communicates to him every day regarding changes in FFB prices. The company also informs the FFB on the notice board at the factory, so that it can be seen by FFB suppliers.

The company shows evidence of FFB purchases from independent smallholders, for example on behalf of Zulkifli for the period of September 2022. In the proof of payment of FFB to these farmers, the FFB price set is in accordance with the price determined by the Plantation Agency of Riau Province attached in the FFB Price Determination document as a result of the Technical Working Group Meeting of the FFB Purchase Price for Palm Oil Production from Partnered Smallholders in Riau Province for the period from 28 September to 4 October 2022.

##### 5.1.3

Based on the company's policy, the determination of the price of FFB purchased refers to the provisions contained in the Regulation of the Minister of Agriculture regarding the Guidelines for Determining the Purchase Price of Fresh Fruit Bunches for Palm Oil Production by Smallholders.

##### 5.1.4 & 5.1.8

Kijang Mill is Part of PT Buana Wiralestari Mas, PT. BWL had obtained a plantation business permit long before Permentan No. 26 of 2007 was enacted so that it is not subject to the obligation to develop plasma plantations for the surrounding community. However, the company already has cooperation with the community regarding the development of scheme smallholder with the PIR TRANS (Kijang Plasma) pattern covering an area of 8,486.79 Ha consisting of 8,147.79 Ha (Planted area), Facilities & Infrastructure/ roads covering 261 Ha and Ditches/ swamp area of 78.00 Ha. An example of a plasma development agreement is as follows:

- Agreement Record with SP 1 KUD Makarti Buana Jaya No. 01/SPK/BWL/DL/III/96 dated 29 March 1996 and Addendum to t Agreement Record with with SP 1 KUD Makarti Buana Jaya No. 021/SPK-BWLM-KKCP/IV/IX/2004 dated 30 September 2004.
- Agreement Record with SP 3 KUD Kijang Mas No. 02/SPK/BWL/DL/III/96 dated 29 March 1999 and Agreement Record with SP 3 KUD Thanks to Ridho No. 003/SPK-BWL /I/FUND/XII/ 02 dated 20 December 2002. Valid until 2017 or the replanting period.

##### 5.1.5 & 5.1.6

Based on contract agreement verification described in indicators 5.1.4 and 5.1.8, known that the agreement is conducted fairly, transparently and based on both party agreement. Has been observed, the payment process has been carried out transparently and there has never been a grievance related to the payment. An example of payment verified by the auditor is invoice and proof of payment for period for 21 September to 5 October 2022 where the calculation of payment is in accordance with agreement. Furthermore, based on the statement of the smallholder members (KUD Lestari Jaya and KUD Mekar Jaya), the company can demonstrate that the payment is in accordance with the agreed agreement (before the 5th of each month).

**5.1.7**

The results of document verifications it was known that the certification unit has routinely calibrated the weighing equipment carried out by a third party. There are 2 weighing equipment at Kijang POM, along with calibration records:

- The certification unit has also shown documents on the weighbridge calibration (Serial Number 141450134) carried out in 25 May 2022 and valid until 25 May 2023 by Legal Industrial and Commerce Department Kampar Regency (No.: 510.3/SKHP.3/UPT-ML/166). The company performs calibrations aimed at improving the integrity of FFB weighing from third parties and also minimizing scale fraud.
- The certification unit has also shown documents on the weighbridge calibration (Serial Number 212051102) carried out in 4 July 2022 and valid until 4 July 2023 by Legal Industrial and Commerce Department Kampar Regency (No.: 510.3/SKHP.3/UPT-ML/218). The company performs calibrations aimed at improving the integrity of FFB weighing from third parties and also minimizing scale fraud.

**5.1.9**

The unit of certification shows the SOP for Handling Complaints and Dissatisfaction with No. SOP/SMART/SUST/IV/003 issued date 1 July 2014 with the last revision 14 February 2022. In the SOP, it is explained that the Social Officer / KTU receives letters of complaint and dissatisfaction directly from the reporter or indirectly through the suggestion box. Information and data entered are recorded in the Complaint and Dissatisfaction Registration Form. Protection of whistle blowers is contained in the document, point 4.6.1 part a, which states that the Company guarantees the anonymity of whistle-blowers and whistle-blowers with the aim of reducing the risk of revenge.

Based on document review of complaint book, there is no complaint from contractor or vendors.

<b>Status: Comply</b>
-----------------------

**5.2**

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

**5.2.1 & 5.2.5**

The company has no obligation to build community estate (scheme smallholder). Suppliers of FFB from farmers are farmers assisted by companies that are members of Kijang Plasma. Based on traceability information, all of the land rights owned by these farmers are in the form of SHM and have obtained RSPO certificates within the scope of Kijang Mill.

The company also supports the Integrated Ecological Agriculture (PET) program which aims to encourage changes in the mindset and behavior (habits) of people who still manage their land in the traditional way.

**5.2.2 & 5.2.3**

In improving the welfare of the community, the company has provided participation in addition to the annual CSR program, the company has also established partnerships in carrying out tasks assigned to third parties, for example:

- Agreement Record No. SPK/NSAM/01/20/001 – Septic tank suction service on January 4, 2021 with CV Putra Buana Karya from Kijang Rejo village.
- Agreement Record No SPK/NSAM/06/21/018 dated June 12, 2021 for drilling well services in POM employee housing.

**5.2.4**

The company also carries out maintenance activities using pesticides in the form of herbicides as a form of support for the management of plasma farmers in these locations (Kijang Plasma, as described in indicator 5.1.4), this can be seen from the review of documents recording activities for spraying systemic herbicides in the period March 2022. Training for plasma farmers is carried out in the period March 2022 with the title of training activities on the use of pesticides and MSDS.

<b>Status: Comply</b>
-----------------------



## PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

### 6.1

#### Any form of discrimination is prohibited.

##### 6.1.1

The unit of certification already has a non-discrimination and equal opportunity policy as indicated in the Sinarmas Agribusiness and Food Business and Human Rights Policy document which was approved on December 12<sup>th</sup>, 2019, by the Head of Policy and Compliance Division. The policy states that the unit of certification provides equal opportunities for all workers and embraces diversity regardless of ethnicity, religion, disability, gender, political affiliation, sexual orientation, or trade union membership and ensures workers are protected from acts of discrimination at all stages of the employment relationship. This policy has been socialized in each estate and mill unit to workers, for example socialization at the KJGM unit on April 11<sup>th</sup>, 2022. This policy has also been socialized to all stakeholders on February 18<sup>th</sup>, 2022.

In addition, the certification unit also has Circular Letter Number 214/HR PSM 5/12/2015 dated December 8<sup>th</sup>, 2015, which was signed by the CEO of PSM 5. The letter explains the implementation of industrial relations in the unit in order to create harmonious, dynamic and fair relations so that the unit of certification is committed not to discriminate against race, caste, nationality, religion, disability, gender, sexual orientation, union membership, political affiliation, etc.

The unit of certification does not discriminate and treats all workers fairly, the following is evidence that can be shown by companies listed in several employee demographic documents, sample documents for employee recruitment and identification documents and realization of worker training:

- Composition of workers consisting of various ethnic groups, religions, genders, and workers' origins.
- Recruitment of workers based on the results of selection, performance appraisal, ability and expertise of workers.
- Placement and training of workers is carried out according to their expertise/type of work, such as prospective harvest workers are placed as harvest workers and receive routine harvest training.
- Women workers are given reproductive leave rights, wages and the same opportunities for promotion as male workers in the same type of work.

The results of interviews with daycare workers, representatives of trade unions and the gender committee also obtained information that there was no indication of discrimination against religion, ethnicity, sex, and regional origin in the process of accepting a job.

Based on the explanation above, it can be concluded that the unit of certification has treated all workers fairly without discrimination based on gender, ethnicity, religion, health condition or other.

##### 6.1.2

Based on the results of verification of worker recruitment documents, it is known that worker recruitment is based on expertise, ability and records of medical examination results. Likewise, promotion in accordance with the results of the employee's assessment/evaluation. The unit of certification has a non-discrimination and equal opportunity policy as indicated in the GAR Social and Environmental Policy (GSEP) document which was endorsed on September 8<sup>th</sup>, 2015, by the Head of Upstream, CEO – Downstream & Commercial, Executive Director & CFO and Managing Director of Sustainability & Strategic Stakeholder Engagement. It states that in the ethical recruitment process, companies prohibit the practice of charging workers a fee in recruiting and withholding identity documents.

The unit of certification shows a job vacancy document in the KJGE unit issued on September 1<sup>st</sup>, 2022. The document does not find any conditions indicating discrimination. In addition, the unit of certification also shows documents for the recruitment of workers with the initials DWT in the KJGE unit. There are application documents such as e-KTP recording letters, photo identification, job application letters, results of health checks, family cards, etc. The worker was recruited as a pick-up loose fruit worker on October 10<sup>th</sup>, 2022, with a work agreement letter number 139/KJGE/PKWT-SH/10/2022 and is still valid until the audit is carried out.

Based on the results of interviews with workers, trade union representatives and representatives of the gender committee, information was obtained that there were no issues related to discrimination. PT Buana Wiralestari Mas workers come from various regions. Both local and migrant workers are given the same opportunity to get a job and promotion as well. The unit of certification also does not retain identity documents during the worker recruitment process.



**6.1.3**

The certification unit shows documentation of selection, recruitment, employment, access to training, and promotions for its workers. For example, employee performance appraisal and promotion, for example the employee performance appraisal document with the initials WLY at the KJGE unit for the 2021 assessment period which provides information regarding the assessment criteria (discipline, work quantity, work quality, cooperation, initiative, responsibility, motivation and understanding of assignments, self-adjustment, leadership, problem solving and decision making), assessment results and follow-up of the assessment results. Then the certification unit shows a Promotional Decree with the initials WLY Number 001/KJGE/SK/06/2022 issued on June 1<sup>st</sup>, 2022. The worker is promoted from PT2-J2 class to PT1-E1 class.

Based on the results of interviews with head of administration, information was obtained that the recruitment process for all employees was carried out through the same process where prospective employees must meet requirements in the form of administrative selection (application letter, graduation letter, photocopy of personal and family identity), psychological test (for certain positions), interviews and results of medical examinations. To increase the career path, responsibility, authority and scope of an employee, the certification unit provides promotions based on skills, abilities, leadership, honesty, discipline, loyalty, attendance, etc. Employee performance appraisal is carried out through the stages of performance evaluation.

**6.1.4**

Pregnancy tests for workers are carried out only to ensure that pregnant workers are not allowed to work with chemicals, not as a basis for discriminating against these workers. If declared pregnant, the worker will be transferred to a job that is safer but remains the same in terms of wages and other benefits, so there is no discriminatory action. This was clarified by the results of interviews with female spray workers and representatives of the gender committee in each plantation unit and factory which stated that female workers are required to carry out monthly pregnancy tests at the clinic to ensure that no pregnant/breastfeeding female workers are exposed to chemical material. Pregnancy testing is not a discriminatory measure provided by the company.

Then from the results of a review of the latest employee recruitment documents and interviews with female workers, it was found that there was no obligation for prospective female workers to take a pregnancy test when recruiting workers. They explained that at the time of recruitment, there was no pregnancy test, but only physical health tests, administration and interviews with prospective leaders.

**6.1.5**

The certification unit has established a gender committee in each unit which has functions including gender equality, protection of women's rights, protection from incidents of harassment, and others. Furthermore, the Unit of Certification shows the document establishing the Organizational Structure of the Gender Committee in each plantation unit and factory for the 2022 period consisting of representatives of each gender, namely men and women. The organizational structure consists of a Protector/Counselor/Advisor, Chairman, Vice Chair, Secretary, Treasurer, Head of Division and Members.

Gender committee work program in 2022 for all units at PT BWLM, including integrated healthcare center, competition for healthy toddlers, competition for healthy home, competition for family medicinal plant, regular gender committee meetings, socialization of sexual harassment, socialization of the rights of women workers, socialization of COVID-19 emergency response, housekeeping for employee housing and daycare, and counseling for women involved in sexual harassment cases.

The unit of certification shows the realization of the program and the results of the gender committee meeting listed in the work program document and the realization of the PT BWLM gender committee in 2022, for example as follows:

- KJGM Unit: Meetings related to sexual harassment, zero burning in employee housing areas and socialization of seasonal diseases during climate change which will be held on September 16<sup>th</sup>, 2022.
- KJGE Unit: Implementation of integrated healthcare center activities and data collection of complaints related to sexual harassment which are carried out routinely every month during 2022.

Based on interviews with women workers, it is known that they know the function, work program, and mechanism for submitting complaints through the gender committee. Then, based on the results of interviews with representatives of the gender committee it is known that until now the work program of the gender committee has prioritized women workers. However, it is possible that cases of sexual harassment or violence against male workers can also be submitted through the gender committee.

Based on the results of a document review of the organizational structure of the gender committee in the factory unit (KJGM) and

plantation unit (KJGE) as well as the results of interviews with gender committee officials, it is known that all management and members of the gender committee are workers at PT Buana Wiralestari Mas in the KJGM and KJGE units. Plasma farmers are not registered as members nor do they participate in gender committee activities. This is because the gender committee is only intended for employees at PT BWLM. Then, workers who work on farmer's land are not workers from the company. They were still the family members of the farmer.

However, based on the results of interviews with 5 plasma farmers it was found that they knew that there was a gender committee in the company. Each cooperative also has 1 companion assistant who functions as a communicator between the plasma farmers/cooperatives and the company. Farmers can submit complaints related to gender issues to the assistant which will later be submitted to the gender committee.

#### 6.1.6

The unit of certification does not discriminate against workers' rights, including wages. The certification unit has a non-discrimination policy as indicated in the GAR Social and Environmental Policy (GSEP) document which was approved on September 8<sup>th</sup>, 2015, by the Head of Upstream, CEO – Downstream & Commercial, Executive Director & CFO and Managing Director of Sustainability & Strategic Stakeholder Engagement. It is stated that the unit of certification ensures that all workers receive wages that are equal to or exceed the legally stipulated minimum wage. Workers get wages in accordance with the Decree of the Governor of Riau number Kpts/1272/XI/2021. In 2022, workers in Kampar Regency, Riau Province, will receive wages of IDR 3,047,470.58

Payment of fair wages has been properly carried out by the unit of certification, taking into account ability, performance, expertise, length of service, and other factors as the basis for remuneration. So that the payment of wages given is in accordance with the burden, duties and type of work of each. This was stated in the Decision Letter document number 033/PSM 5/HR PSM 5/01/2022 which was ratified on January 1<sup>st</sup>, 2022, by the Director. The document explains the Wage Structure and Scale of Permanent Employees of PT Buana Wiralestari Mas Region Kampar Year 2022 which informs the wage scale structure for the lowest class starting from PT4-T1 grade (IDR 2,905,470 + rice allowance IDR 142,500) to the highest grade class PT1-A5 (IDR 3,887,120).

Then based on the results of interviews with harvest workers with the same length of service and class (PT4), it is known that the basic wages and benefits they receive are the same. However, it is different from workers who are of a higher class (PT1 – PT3) because it is based on the prevailing wage scale,

<b>Status: Comply</b>
-----------------------

### 6.2

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

#### 6.2.1

The unit of certification demonstrates the procedures/policies related to wages and work requirements in accordance with the provisions on manpower that have been published in the national language (Indonesian) listed in several documents, namely:

- Decree of the Governor of Riau with Number Kpts.1272/XI/2021 which was stipulated on November 30<sup>th</sup>, 2021, regarding the minimum wage in Kampar Regency in 2022 of IDR 3,047,470.58
- As a follow-up to the Governor's Decree, the certification unit shows the Company's Wage Determination Decree Number 003/PSM 5/HR PSM 5/01/2022 concerning the Structure and Scale of Wages for Permanent Employees of PT Buana Wiralestari Mas in Kampar Regency, Riau Province in 2022 which was issued on January 1, 2022. It is known that the wage scale structure starts from the lowest class, namely PT4-T1 (IDR 2,905,470) to the highest grade PT1-A5 (IDR 3,887,120). This wage range does not include in-kind (rice) given based on a mutual agreement in the PKB. Based on the results of interviews with workers and representatives of the certification unit, information was obtained that the in-kind allowance (rice) for workers is 15 kg/worker or IDR 142,500/worker.
- In the *PKWT* Work Agreement – Production Unit for this type of work, it is known that the wages given to workers are IDR 650/kg of loose fruit.

The unit of certification can show documentation of payment of wages for all workers shown in the payroll and payslip which include components such as basic wages, premiums, overtime, benefits (*BPJS*, electricity subsidies, etc.), and deductions (*BPJS*, loans, *SPS*, cooperatives, etc). Based on the interview results, workers can explain the basic wages and benefits as well as the deductions received every month. Following are some examples of wage documents in October 2022 for workers, including:

- A daycare officer with the initials SW in the KJGE unit receives a basic salary of IDR 2,905,470 plus an allowance of 15 kg of rice

or IDR 142,500.

- A boiler operator with the initials SS in the KJGM unit receives a basic wage of IDR 3,063,020

Based on interviews with cooperative staff and 5 plasma farmers, it is known that salaries are paid once a month. The company will pay the wages of the plasma farmers through the cooperative (KUD/KOPSA), then the treasurer of the cooperative will provide payments to the farmer groups which will then be forwarded to the plasma farmers (land owners). This is in line with the results of a review of the November 2022 salary payment documents belonging to plasma farmers with the initials SS, who receive wages in accordance with the harvest yields for that month. And it was already complied with the minimum wage of Kampar Regency.

Based on the description above, it can be concluded that the unit of certification already has documentation of wages and work conditions in accordance with the labor regulations that apply to workers in the national language, along with an explanation for workers in a language they understand.

### 6.2.2

The unit of certification can show examples of work agreement documents, for example as follows:

- *PKWT* work agreement letter No. 002/KJGM/PKWT/08/2022 at the KJGM unit. The worker with the initials BDAW signed a work agreement in August 2022. The agreement was still valid at the time of the audit.
- *PKWT* work agreement letter - Unit of Results Number 139/KJGE/PKWT-SH/10/2022 in the KJGE unit. The worker with the initials DWT signs a work agreement on October 10<sup>th</sup>, 2022. The agreement is valid from October 10<sup>th</sup>, 2022 to April 9<sup>th</sup>, 2023.

As for the work agreement document shown, it contains information including the name acting as management representative and company address, employee information in the form of name and other personal information, employee position, employee work location, reporting, work duties and responsibilities, work agreement period, probationary period, salary and other benefits. The work agreement document has been signed by representatives of management and workers.

As a form of implementation of the work agreement letter, the unit of certification shows payroll documents in October 2022. For example, a daycare officer with the initials SW received a basic salary for October 2022 which is in accordance with the applicable UMK, which is IDR 2,905,470 plus an allowance of 15 kg of rice or IDR 142,500. Based on the review, known that payroll documents give accurate information on compensation for all work performed.

Work agreements along with related documents that detail wages and work conditions (work hours, deductions, overtime, sick leave, leave, maternity leave, etc.) has been stated in the Collective Labor Agreement (CLA) document for the 2018 – 2020 period which was ratified on July 4<sup>th</sup>, 2018, by BKS-PPS and FSP.PP-SPSI. For example, in Article VIII, it is explained that workers will get wage deductions if they do not do work. In connection with the end of the CLA for the 2018 – 2020 period in the Provinces of NAD, North Sumatra, Riau and Jambi, currently the negotiating team consists of BKS-PPS and FSP.PP-SPSI have held negotiations 5 times where the last negotiation was held on January 11<sup>th</sup>, 2022. Based on a letter from BKS-PPS number 88/BKS-PPS/2022, it is known that currently the CLA for the 2022 – 2024 period is in the process of being registered with the Indonesian Ministry of Manpower so that the negotiating team agrees that the CLA for the 2018 – 2020 period is still valid as long as the new CLA has not been declared valid.

Then, based on the results of a field visit to a daycare centre at the KJGE unit, information was obtained that there were 2 workers who previously worked as plant maintenance workers. The two workers have signed a work agreement as maintenance workers. Before being transferred to the work in a daycare centre, the worker has been explained by the management representative regarding the job description, rights and obligations as a daycare worker. This is in line with the results of interviews with workers that they have understood the job descriptions, the wages they get, and other matters related to working conditions in child care centre. Then, the unit of certification showed decree number 038/KJGE/Intern/06/2021 regarding the transfer of positions of workers with the initials IBR and E who originally worked as plant maintenance to become daycare workers. The decree is valid from June 26<sup>th</sup>, 2021, and has been approved by the Estate Manager.

As a result of interviews with management representatives, information was obtained that currently plant maintenance workers at the unit of certification are paid wages based on yield units. This is in line with the verification of the *PKWT* work agreement letter - yield unit, for example number 139/KJGE/PKWT-SH/10/2022. From the work agreement letter, it is known that the scope of maintenance work is pick-up loose fruit, fertilizing, spraying, budding, raking discs, EFB retail and fertilizer retail. Workers will receive wages based on the results obtained, for example, to pick-up loose fruit of IDR 650/kg.

The cooperative has shown employee data for the period October 2022, for example in the KUD Manunggal Abadi there are 8 spray workers. An employment agreement is drawn up between the worker and the management representative of the cooperative. The cooperative also shows employee pay slips in November 2022 which are in accordance with the minimum wage that applies in Kampar district

### 6.2.3

The unit of certification shows evidence of legal compliance regarding the fulfillment of labor rights to workers, for example:

- Harvest workers with the initials PRL who receive a harvest premium in October 2022 of IDR 1,716,754
- Defined and agreed working hours are 7 hours a day and 40 hours a week. If there are excess working hours, overtime is paid. For example:
  - Engine room operator pay slip document with the initials EZ who received overtime pay of IDR 1,883,559 in October 2022 for a total of 30 hours of overtime. Workers have signed an overtime order agreed by both parties (worker and certification unit representative) before carrying out overtime work.
  - Boiler operator pay slip documents with the initials SS who receive overtime pay of IDR 2,660,122 in October 2022 with a total of 66 hours of overtime. Workers have signed an overtime order agreed by both parties (worker and certification unit representative) before carrying out overtime work.
- Annual leave application form:
  - A worker with the initials SYN who apply for 2 days of leave from the total remaining 11 days of leave entitlements. The request has been approved by the Process Assistant.
  - A worker with the initials SFN who apply for 1 day of leave from the total remaining 12 days of leave rights. The request has been approved by the Estate Manager.
- Menstrual leave application formula: A worker with the initials KMT apply for 2 days menstrual leave. The request has been approved by the Estate Manager.
- Maternity leave application form: A worker with the initials RT apply for maternity leave based on an examination certificate from the doctor at the clinic. The worker is on leave for 90 days before and after giving birth from September 24<sup>th</sup>, 2022 to November 7<sup>th</sup>, 2022.
- Termination of employment with the initials MT based on statement letter number 002/BWLM-KJGM/PHK/VII/2022 on July 25<sup>th</sup>, 2022, due to employee disciplinary action. The unit of certification also shows a warning letter as a form of disciplinary action notification period to its employees before dismissal, namely:
  - First warning letter on July 30<sup>th</sup>, 2021
  - Second warning letter on October 29<sup>th</sup>, 2021
  - Third warning letter on March 30<sup>th</sup>, 2022

Based on interviews with security officers, it is known that they have 7 hours of work starting from 07.00 – 15.00 plus 1 hour of overtime for weekdays and 3 hours of overtime on short days. If there are excess working hours, the payment of wages is adjusted to CLA for the period 2018 – 2020 and regulations regarding overtime pay (*PP* Number 35 of 2022).

Every worker also has the right to annual leave of 12 days in one year. Specifically for female workers, the unit of certification grants the right to 2 days of menstrual leave and 1.5 months of maternity leave before and after giving birth. It can be concluded that the implementation of working hours, minimum wages, overtime wages, leave entitlements, and others is in accordance with the provisions of applicable labor laws.

### 6.2.4

The certification unit has a list of worker welfare infrastructure facilities updated for 2022 for each estate and mill unit, where there are workers' housing facilities, religious facilities (houses of worship), sports facilities, health facilities in the form of clinics and First Aid Posts, clean water facilities, electricity in the form of *PLN*, daycare, school buses and others. Currently, all welfare facilities provided in general are in proper condition and can be used by workers and their families. The certification unit also has a maintenance program for workers' welfare infrastructure as listed in the 2022 period Monitoring Public Facilities Conditions document prepared by the SPO Officer and approved by the Estate/Factory Manager. The document describes conditions for workers' welfare facilities currently in good condition.

Based on the results of field observations in KJGM and KJGE employee housing areas, it is known that the welfare facilities provided

are in proper/good condition, workers' homes consist of 2 bedrooms, 1 bathroom and kitchen, clean water is provided every day, electricity in the form of *PLN* and workers receive electricity subsidy allowances every month, religious facilities in the form of mosques and churches, sports facilities (football fields, volleyball courts, takraw fields and tennis courts), educational facilities (kindergartens and elementary schools), transportation facilities in the form of school buses, as well as other facilities. Clinics and first aid posts are available as worker health facilities that can be accessed by workers and their families. This is supported by the results of interviews with residents of the housing which stated that the housing facilities provided were in decent condition, one house was occupied by 1 head of family and so far, if there were complaints from workers regarding housing facilities, the unit of certification would respond and as soon as possible carry out repair.

In accordance with the description above, it can be concluded that the certification unit already has facilities and infrastructure for the welfare of workers in proper conditions and accessible to workers and their families.

#### 6.2.5

Based on the results of field visits to employee housing, it is known that the certification unit has made it easier for workers and their families to obtain food sources by providing buildings for small businesses in each employee housing that workers can rent to sell their daily needs.

Then from the results of interviews with workers in plantations and factories as well as residents of houses in employee housing, it is known that they do not experience difficulties in obtaining food sources because they can shop at food stalls in residential areas. In addition, the location of the Estate and Mill is also close to traditional markets and villages, so that access to food and daily needs is very easy for workers to reach.

#### 6.2.6

Currently the company uses wage calculations based on the 2022 Kampar District Minimum Wage in accordance with the Riau Governor's Decree Number Kpts.1272/XI/2021 which was stipulated on November 30<sup>th</sup>, 2021, which is IDR 3,047,470.58. This decree of minimum wage also included in DLW calculation established by the company. The DLW calculation is refers to the actual and rational price around the certification unit location.

Calculation of prevailing wages & in kind benefits independently shown in the Prevailing Wage Calculation document for the 2022 Fiscal Year PT Ramajaya Pramukti and PT Buana Wiralestari Mas Region Kampar which was stipulated on February 18<sup>th</sup>, 2022, and has been approved by the CEO of PSM 5. Wages apply as basic wages, allowances such as THR and rice, facilities such as electricity, housing, water, schools, polyclinic facilities and services and child care. The calculation of prevailing wages & in-kind benefits varies depending on the type of work and worker status (PKWT, PT 4A, PT 4B, PT3, PT2 and PT1), ranging from IDR 3,497,840 – IDR 4,062,627 / month. This calculation has a difference with the minimum wages of 14.8% - 33.3%.

#### 6.2.7

Based on the results of a review of the employee list document for October 2022, there are a total of 546 workers in estate and mill units (KJGM and KJGE). Of the total workers, there are workers with PKWT status who are employed by the unit of certification in the work of pick-up loose fruit and cleaning worker (compound). As for the other employees, they are workers with permanent employee status who are in the PT 1 – PT 4 group.

The certification unit has also reported the use of *PKWT* workers to the Office of Industry and Manpower, Bangkinang City, Kampar Regency. For example, reporting on September 5<sup>th</sup> and October 3<sup>rd</sup>, 2022, with a total of 23 employees.

The results of interviews with spray, fertilizer, harvester and factory operators' workers found that workers understand the recruitment system, worker status and the orientation period that must be passed before workers are appointed as permanent workers. These processes are stated to be quite fair and provide equal opportunities to work according to the abilities, skills and achievements of workers during the orientation period.

Based on the results of work agreement verification for all harvest workers at KJGE, it is known that a work agreement was made between the workers and management representatives from PT Buana Wiralestari Mas. For example, a work agreement letter number 117/Kijang Estate/*Pemanen*/09/2022 signed on September 1<sup>st</sup>, 2022.

The cooperative has shown employee data for the period October 2022, for example in the KUD Manunggal Abadi there are 8 spray workers.



An employment agreement is drawn up between the worker and the management representative of the cooperative. The cooperative also shows employee pay slips in November 2022 which are in accordance with the minimum wage that applies in Kampar district

**Status: Comply**

### 6.3

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

#### 6.3.1

The unit of certification has a policy regarding the formation of labor unions listed in the GAR Social and Environmental Policy (GSEP) document which was ratified on September 8<sup>th</sup>, 2015, by the Head of Upstream, CEO – Downstream & Commercial, Executive Director & CFO and Managing Director of Sustainability & Strategic Stakeholder Engagement. The policy explains the unit's commitment to giving freedom to workers to form collective bargaining and join trade unions. The GSEP policy is written in Indonesian so that workers can understand it.

The unit of certification has a labor union which is incorporated in one *SPS*/forum as a forum for workers to convey their complaints or aspirations to the unit of certification. The following is the document for the establishment of Labor Union:

- Proof of registration of *SPS*/PT Buana Wiralestari Mas KJGM unit at the Office of Manpower and Population, Bangkinang City, Kampar Regency with registration number 560/DTK-SPPP-SPSI/2008/68 on August 11<sup>th</sup>, 2008.
- Proof of registration of *SPS*/PT Buana Wiralestari Mas KJGE unit at the Office of Industry and Manpower, Bangkinang City, Kampar Regency with registration number 251/DSTK-PUK-SPPP-SPSI/III/2016/25 on March 10<sup>th</sup>, 2016.

Based on the results of interviews with representatives of trade unions, it is known that trade unions hold regular meetings to discuss complaints and aspirations expressed by workers. Then based on the results of interviews with workshop workers in the KJGE unit and security in the KJGM unit, information was obtained that workers can submit complaints or complaints through the trade union. If there is a dispute in terms of unfinished industrial relations between workers and the unit of certification, the union will be responsible for resolving the problem.

Based on a document review of the organizational structure and the list of labor union members, it is known that the plasma farmers are not registered as union members, this is because union activities are only for workers at PT BWLM. Then, workers who work on farmer's land are not workers from the company. They were still the family members of the farmer.

However, based on the results of interviews with 5 plasma farmers it was found that they knew that there was a gender committee in the company. Each cooperative also has 1 companion assistant who functions as a communicator between the plasma farmers/cooperatives and the company. Farmers can submit complaints to the assistant which will later be submitted to the labor union.

#### 6.3.2

The unit of certification also shows documents of trade union internal meetings and bipartite meetings listed in the Minutes of Labor Union Meetings document, including the following:

- Minutes of *SPS*/ meeting in KJGM unit on July 25<sup>th</sup>, 2022, in which one of the agendas discussed coaching for employees who violated the rules.
- Minutes of bipartite meeting in KJGE unit on July 23<sup>rd</sup>, 2022, which discussed the employee get-together event in commemoration of the 77<sup>th</sup> Anniversary of the Republic of Indonesia.

#### 6.3.3

Based on the verification of the organizational structure of the trade unions in each estate and factory unit, it is known that the workers' union officials in all estates and mills are not representatives of management/company staff. Then, based on the results of interviews with trade union representatives and union members, it is known that there is no intervention from the unit of certification in selecting or organizing trade union activities. This is in line with the GAR Social and Environmental Policy (GSEP) which was ratified on September 8<sup>th</sup>, 2015, by the Head of Upstream, CEO – Downstream & Commercial, Executive Director & CFO and Managing Director of Sustainability & Strategic Stakeholder Engagement. It is stated that the unit of certification will not interfere with the activities of workers' organizations or trade union representatives.

Based on the results of interviews with workers, it is known that the company has given them the freedom to form and join trade unions.



Then, union membership is voluntary without coercion. Of the several contract workers (*PKWT*) interviewed, some were union members and some were not.

**Status: Comply**

#### 6.4

#### Children are not employed or exploited.

##### 6.4.1

The certification unit has a policy prohibiting the employment of minors contained in the GAR Social and Environmental Policy (GSEP) document which was approved on September 8<sup>th</sup>, 2015, by the Head of Upstream, CEO – Downstream & Commercial, Executive Director & CFO and Managing Director of Sustainability & Strategic Stakeholder Engagement. As this policy is known, the company prohibits the employment of children and will take action to prevent the use of child labor in all line of operations activities. . This policy also applies and is required to be obeyed by plasma farmers, contractors and other stakeholders who have partnership relationships or active in operations and transactions within the company. The policies related to the prohibition of child labor as stated in the work agreement between the plasma smallholders/contractors and the company. In addition, the company also conducts socialization on a regular basis.

Based on the employee list for the October 2022 period, it is known that none of the employees were younger than 18 years old when they first started working. Then, based on the results of verification of work contract documents with local contractors, for example Work Agreement Letter Number 006/BWM/JKTO-V/VIII/2021-ATBS, it is stated that the minimum age requirement for workers has been included, namely 18 years.

Based on the results of interviews with representatives of the trade union and PT SJA contractors, information was obtained that there had never been any issues regarding child labour. In addition, around the company area there are warnings informing the prohibition for children to be in the work location.

##### 6.4.2

The unit of certification shows the 2022 Employee List documents for estate and mill units (KJGM and KJGE) where there are no children under the age of 18 who are employed. In addition, the company has also shown Recruitment SOP document number KHI-smart/001-00 which was approved on August 1<sup>st</sup>, 2017, by the HR Managing Director. The SOP explains that in the labor recruitment process, the company does not accept prospective workers who are under 18 years of age. This is in line with job vacancy information documents, for example in the KJGM unit for the period June 2022 which states the requirements for prospective workers who must be ≥ 18 years old.

Based on the interview with administration staff, it was explained that in the employee recruitment process an age screening will be carried out before going through an identity check (*KTP* or Birth Certificate) to ensure that the age requirements of workers are met and not violated.

##### 6.4.3

Based on a review of the employee list document, the list of students who took part in field work practices and the results of interviews with management representatives, information was obtained that there were no young workers and students who carried out field work practices in the company's operational areas.

Based on the results of interviews with trade union representatives and management representatives, it is known that if there are students who do practical work in the field, they will be placed in non-hazardous jobs or as observers of plantation and factory activities. Because the goal is only to meet the needs of fulfilling the learning curriculum.

##### 6.4.4

Socialization regarding child protection policies and the prohibition of child labor has been carried out in each estate and mill unit. For example, socialization at the KJGE unit on June 20<sup>th</sup>, 2022, and at the KJGM unit on April 11<sup>th</sup>, 2022. The company has also conducted outreach to contractor workers and external stakeholders which was held on February 18<sup>th</sup>, 2022.

Based on the results of field observations in the plantation and factory areas, it is known that the company has a warning regarding the prohibition of child labor and the prohibition of children being in the company's operational areas.

**Status: Comply**
**6.5**
**There is no harassment or abuse in the workplace, and reproductive rights are protected.**
**6.5.1**

The company already has a policy on guaranteeing that workers are free from all forms of harassment, threats, persecution contained in the GAR Social and Environmental Policy (GSEP) which was ratified on September 8<sup>th</sup>, 2015, by the Head of Upstream, CEO – Downstream & Commercial, Executive Director & CFO and Managing Director of Sustainability & Strategic Stakeholder Engagement. To ensure that this policy is implemented, the company has a reporting mechanism in place when there is harassment in the workplace. This policy also applies and must be complied with by plasma smallholders, contractors and other stakeholders who have partnership relationships or are active in operations and transactions within the company. Then, the company routinely conducts socialization to plasma farmers and other stakeholders, for example on February 18<sup>th</sup>, 2022.

The unit of certification also shows Circular Letter Number Ref.017/HR-PSM5/01/2013 which has been in effect since January 14<sup>th</sup>, 2013. The document explains the policy of prohibiting acts of sexual harassment within the company's operational environment. Both of these policies have been socialized to workers in the plantation and factory units, for example the socialization on July 15<sup>th</sup>, 2022, at the RBKE unit was attended by 30 workers. This is in line with the results of interviews with workers who already know the flow of complaints if they do experience incidents of harassment at work.

Based on the results of interviews with workers and gender committee officials, information was obtained that workers can submit complaints through their direct superiors or through the gender committee. In addition, during the past year there were no cases of sexual harassment. This is supported by the absence of complaints regarding sexual harassment in the minutes of gender committee meetings in all plantation and factory units during 2021 – 2022.

**6.5.2**

The company has policies related to pregnant women workers listed in the Collective Labor Agreement for the 2018-2020 period. Article IV point 6 states that companies are prohibited from employing pregnant women workers who, according to doctors, are dangerous to the health and safety of their wombs and themselves if they work between 23.00 and 07.00 (referring to the provisions of the Labor Law number 13 of 2003).

In addition, the company also has a policy regarding the protection of women's reproductive rights as stated in Circular Letter No. 002/CEO5-SE/03/2009 which was ratified on March 2, 2009 by CEO 5. The letter explains that female workers who are menstruating feel pain and based on a doctor's examination and inform the company that they are not required to work on the first and second days of menstruation (refers to the provisions of the Labor Law number 13 of 2003). This policy has been socialized in each unit, for example at the KJGE unit on July 1<sup>st</sup>, 2022, which was attended by 30 workers.

Evidence of the implementation of this policy is listed in the recapitulation document for menstrual leave and maternity leave for 2022. For example, in the KJGE unit there is 4 worker taking maternity leave.

This policy also applies and must be complied with by plasma smallholders, contractors and other stakeholders who have partnership relationships or are active in operations and transactions within the company. Then, the company routinely conducts socialization to plasma farmers and other stakeholders. In addition, if there are women workers who are menstruating and pregnant who want to have their health checked, they can go to the company clinic for treatment.

Based on the results of interviews with the management of the gender committee, information was obtained that female workers have the right to leave for menstruation and maternity leave. The mechanism for granting menstrual leave is carried out by means of an examination first at the first aid post/clinic by the company doctor, then workers who apply for a menstrual leave permit must rest at the first aid post/clinic until the time they return from work. In addition, the source also stated that pregnant and newly born women workers should not do spray work or other work that is directly related to the management of chemicals.

**6.5.3**

The unit of certification has identified and carried out activities related to assessing the needs of new mothers listed in the Minutes of Identifying Needs of Postpartum Mothers for the 2022 period and has been approved by the Estate and Mill Manager. The document describes the needs and facilities for new mothers with the following details:

Needs	Facilities
Time off for pregnant women before and after giving birth	Granting maternity leave rights for 1.5 months before and after giving birth
Not contaminated with chemicals	Prohibition of pregnant and lactating women workers in spray work and work directly related to the management of chemicals
Places to breastfeed and express and store breast milk	Provide a breastfeeding room for workers' children who are breastfeeding at the daycare
Child care at work	Provision of daycare facilities

Based on the results of interviews with the management of the gender committee in each unit, information was obtained that new mothers were given special rest periods so they could breastfeed their children, pre and postnatal health check facilities at integrated healthcare center activities and were kept away from work that used chemicals when pregnant or just gave birth.

Based on interviews with management representatives, it is known that the assessment of the needs of new mothers is also intended for plasma farmers, plasma workers, farmer groups and cooperatives. Then, based on interviews with the management of the cooperative and 5 plasma farmers, information was obtained that they were aware of the policies in force at the company regarding the prohibition of pregnant/breastfeeding women workers who have contact with chemicals and special rest hours for pregnant/breastfeeding women workers. This statement is in accordance with the applicable assessment.

#### 6.5.4

The company has SOP for Handling Complaints and Dissatisfaction No. SOP/SMART/SUST/IV/003 which was ratified on February 14<sup>th</sup>, 2022, by the Head of Upstream. In Chapter 4, point 4.6.1 letter b, it is stated that "The company guarantees the anonymity of the reporter and whistleblower with the aim of reducing the risk of retaliation". The procedure explains that the steps for submitting complaints verbally and/or in writing are addressed to the management leadership. Maximum response to workers is 2 weeks if approval from the department head is not required and 1 month if approval is required.

The company also has a Sinarmas Agribusiness and Food Business and Human Rights Policy which was ratified on December 12<sup>th</sup>, 2019 by the Head of Policy and Compliance Division. In point 9 of the policy, it is explained that "Respect and protect the rights of whistleblowers and human rights defenders".

These procedures and policies have been socialized in each plantation unit and factory, for example socialization at the KJGE unit on June 20<sup>th</sup>, 2022, and at the KJGM unit on April 11<sup>th</sup>, 2022. In addition, based on the results of interviews with day care workers, it was conveyed that complaints can be submitted to the direct supervisor, to the labor union or to the gender committee (specific complaints on women's issues) and the identity of the complainant will be kept confidential. This aims to provide space for all workers or stakeholders to be able to submit complaints comfortably if there are practices that are not in accordance with the ethical practice policy.

Status: Comply

#### 6.6

##### No forms of forced or trafficked labour are used.

#### 6.6.1

The company shows the Sinarmas Agribusiness and Food Business and Human Rights Policy document which was approved on December 12<sup>th</sup>, 2019, by the Head of Policy and Compliance Division. The document states that the company is committed to preventing the practice of forced labor or slavery and not using workers who are the result of human trafficking in all operational activities. This policy has been disseminated to workers in each plantation and factory unit, for example socialization at the KJGE unit on June 20<sup>th</sup>, 2022 and at the KJGM unit on April 11<sup>th</sup>, 2022, and to stakeholders (contractor workers and surrounding communities) on February 18<sup>th</sup>, 2022. This policy also applies and is required to be obeyed by plasma farmers, contractors and other stakeholders who have partnership relationships or active in operations and transactions within the company

Then, based on the results of interviews with representatives of the Trade Unions, the following information was obtained:

- There were no acts of forced labor carried out by the company. For example, for harvesters who work every day for 7 hours of work. The unit of certification provides an output target (base) that can be obtained in less than 7 working hours. If the harvester obtains more base, he will receive a harvest premium payment. But if they don't get results due to natural factors such as rain, they

will not get a penalty. Then, based on the list of payments, harvesters have earned wages above the minimum wage.

- There is no retention of identity documents during the worker recruitment process.
- Every worker who works overtime always signs an overtime order.
- Payment of wages to workers is never late. Salary is given every 7th at the beginning of the month.

#### 6.6.2

Based on the results of a review of the employee list document for the period October 2022, it is known that there is no use of foreign workers at PT Buana Wiralestari Mas. The workforce in the company includes permanent workers (*PT*) and contract worker (*PKWT*) who come from Indonesia. Then from the results of interviews with representatives of the Trade Union and company representatives, it is known that there are no foreign workers in the company. The resource person also added information that all procedures related to human resource management have been implemented in the company's operational areas. Each worker has a work agreement that describes a specific job description and there is no replacement of the contract without prior consultation and approval of the worker.

**Status: Comply**

#### 6.7

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

##### 6.7.1

The CH has a person in charge of occupational safety and health (OHS) in the KJGM, KJME and KJNP units through an OHS Committee decree ratified by the Head of the Riau Province Manpower and Transmigration Office. For example, there is Decree OHS Committee in KJNP No. Decree. 303/Disnakertrans-PK/SK-P2K3/IX/2020 concerning ratification of OHS Committee at PT. BWL – Kijang Kencana Plasma which was approved by the Head of the Riau Province Manpower and Transmigration Office on September 29<sup>th</sup>, 2020 which is valid as long as there is no change in the organizational structure. In Decree OHS Committee, it consists of a OHS Committee supervisor namely regional control, a OHS Committee chairman an estate manager, a OHS Committee vice chairman namely Administration Head KJNP and a OHS Committee secretary, an SPO Officer, a general OHS expert. P2K3 Secretary on behalf of Hendrayadi RI Menaker Decree No. 5/5256/AS.01.03/IV/2022 regarding the designation of AK3U, which was set on April 28, 2022, valid for 3 years from the date of appointment, namely until April 28, 2025 and OHS Expert authorization card No. Reg. 69215/PK3/AJ/91/2022/P1 valid until 28 April 2025.

The company has held regular meetings between OHS Committee management and employees which are held every month. For example, there was a regular monthly meeting at KJNG on October 14<sup>th</sup>, 2022 which was attended by all staff, 10 assistants and estate managers. During the meeting several things were discussed including consistency in the use of PPE in the factory environment.

Based on the description above, it shows that the certification unit has a person in charge of Occupational Safety and Health (OHS) and records of regular meetings between the person in charge and the workers have been made available

##### 6.7.2

The CH has emergency and work accident response procedures in several policies including:

- SOP for handling work-related accidents and diseases (SOP/SMART/HESS-EHSD-10).
  - Scope includes handling and reporting work accidents and Occupational Diseases
  - Explanation of Work Accident Reporting: Investigation and disposition of the results of the investigation
  - An investigation is carried out so that the accident does not recur by using the Accident / Incident and Emergency Investigation Report form (F/SMART/HESS-EHSD/SADV/005/002).
  - Disposition of the results of the investigation: considering the results of the investigation in the form of follow-up recommendations for the improvement and prevention.
- SOP for Emergency Preparedness and Response (SOP/SMART/UMUM/SADV/II/005).
  - Scope: emergency preparedness and response activities in plantations, factories and other supporting units.
  - Emergencies: Types of emergencies include fire, explosion, land fire, earthquake, flood, spill of hazardous chemicals, confusion of chemicals through mouth, burst sewage pond embankment and riots

The CH already has a certified First Aid officer from the Manpower Office. For example, the First Aid Officer Training held on July 21<sup>st</sup> – 23<sup>rd</sup> 2017 by PT. Arpindo Pratama with certificate number 4392/PK3-P3K/IX/2017 dated September 4<sup>th</sup>, 2017. In addition, first aid training was held internally by the company, including first aid training which was attended by 28 KJNP employees.

In addition, in factory and office areas there are evacuation routes to assembly points according to the evacuation route map as one of the instructions in case of a situation emergency

Based on the description above, it shows that the company has emergency response procedures and work accidents that are clearly understood by all workers, there are workers in the field who have attended First Aid Training and records of all work accidents are kept and reviewed periodically

### 6.7.3

The CU has PPE in stock, including in the KJGM Warehouse there are PPE stocks in the form of 162 pairs of safety shoes, 162 units of safety helmets, 8 units of safety glasses, 12 pairs of gloves, 62 pairs of leather gloves, 10 pairs of rubber gloves, ear muff 24 units and 6 units masks.

In addition, the unit certification unit has a work program that has been prepared for 2022, including evaluation of the implementation of the OHS program, repair and maintenance programs and inspections for compliance with the use of PPE every month. The certification unit has carried out special health monitoring in August 2022 and periodic health checks in February 2022. The certification unit routinely reports the results of OHS Committee activities every 3 months and OHS Committee meetings are held every month. Based on the results of field observations at the grading station, loading ramp station, sterilizer station, boiler station and engine room station at KJGM, all employees have used PPE according to risk identification and are free of charge.

In addition, based on observations at KJGE and KJNP, there are rinse-house facilities for spray employees so that employees can return home clean. The rinse house has provided a rinse room for spray employees, emergency facilities in the form of an eye washer, fire extinguisher, etc. Also, a place to store PPE and spray equipment.

Observations to the plasma were carried out on Saturday December 3<sup>rd</sup>, 2022 and on Saturday there was no work in the field. The auditor could not make direct observations regarding the use of PPE in the field, but based on the results of interviews with 5 landowners it was known that employees were provided with PPE according to the potential risks and PPE was replaced whenever there was damage. Based on observations in the PPE warehouse, it is known that there is a stock of PPE per. November 30, 2022 including 15 pairs of AP boots, 15 units of safety helmets, 8 units of aprons, 8 sets of spray suits, 12 pairs of rubber gloves, 8 units of respirator masks, cloth masks and 12 units of activated carbon. This PPE stock will be given to employees if there is damage to PPE and requests for replacement of PPE from field supervision.

Based on the description above, it shows that workers have used appropriate Personal Protective Equipment (PPE) and are provided free of charge. In addition, the certification unit has provided sanitation facilities for workers who use pesticides so that workers can remove PPE, clean themselves and put on their personal clothes.

### 6.7.4

The certification unit already has a list of workers which also includes *BPJS Ketenagakerjaan* participant numbers for all workers (including workers with *PT* and *PKWT* status/group) in each estate and mill unit. As one example, based on a review of the October 2022 worker list document and proof of payment for *BPJS Ketenagakerjaan* and *BPJS Kesehatan* for the same period, it is known that companies have registered and paid all their workers in the *BPJS Ketenagakerjaan* program, which consists of work accident insurance, death benefit, old age benefit and pension benefit via bank transfer with details as follows:

- KJGM
  - The list of workers in the KJGM unit for the October 2022 period is 156 workers.
  - Proof of payment for *BPJS Ketenagakerjaan* for the October 2022 period for a total of 152 workers on November 9<sup>th</sup>, 2022. Based on the employee data documents and proof of payment for *BPJS Ketenagakerjaan*, it is known that there is a difference of 4 people who are not paid into the program. The results of interviews with management representatives stated that 4 workers had left the company, of which 3 employees were terminated due to disciplinary action and 1 other employee resigned.
  - Proof of payment for *BPJS Kesehatan* for the October 2022 period for a total of 151 workers and 386 dependents on November 9<sup>th</sup>, 2022. Based on the employee data documents and proof of payment for *BPJS Kesehatan*, it is known that there is a difference of 5 people who are not paid into the program. The results of interviews with management representatives stated that 4 workers had left the company and 1 other worker had just been recruited by the company so that they were still in the process of registering into the *BPJS Kesehatan* program.
- KJGE
  - The list of workers in the KJGE unit for the period October 2022 is 390 workers.
  - Proof of payment for *BPJS Ketenagakerjaan* for the October 2022 period for a total of 390 workers on November 9<sup>th</sup>, 2022.
  - Proof of payment for *BPJS Kesehatan* for the October 2022 period for a total of 390 workers and 462 workers' dependents on November 9<sup>th</sup>, 2022.

Based on the results of interviews with plantation and factory workers, it is known that the company has provided employment



guarantees to all workers and health insurance to workers and their families (wife and children). The workers have held the *BPJS* card and know the registration number. The worker also added information that the *BPJS Kesehatan* card can be used for treatment when a family member is sick.

Based on the results of a review of the employee list document for the period October 2022 as well as the results of interviews with management representatives, it is known that workers who work on farmer's land are not workers from the company. They are still members of a farmer family.

Then, based on the results of interviews with 5 plasma farmers it was found that their family members had been registered with the *BPJS* program, while those who were registered with the *JAMKESDA* or *PBI* programs. The informants also added information that workers or plasma farmers (land owners) can seek treatment at the company's clinic and at the community health centre in the surrounding villages.

Based on the above, it can be concluded that the company has provided health services and protected all its workers with *BPJS Ketenagakerjaan* and *BPJS Kesehatan*.

#### 6.7.5

The unit of certification has recorded all work accidents and stored and reviewed periodically at KJGM, KJNP and KJGE. As an example, there is the 2022 FR & SR annual recapitulation report for PT. BWL KJNP for the period January – October 2022 made by the SPO Officer on November 10<sup>th</sup>, 2022 and approved by the Plasma Estate Manager where during the period in the KJNP unit there were no ape accidents. For example, in October 2022 there were 10 employees, 25 working days, 15 non-effective working days, 318 hours of overtime, 1,963 working hours for all employees, no working days lost due to work accidents. The employee working hours during the January-October 2022 period were 19,799 working hours and there were no work accidents during 2022. Based on this, the FR and SR values were 0, this shows that employees work in safe areas and have succeeded in mitigating potential work accidents in the field.

Based on the description above, it shows that the unit of certification has recorded work accidents using the Lost Time Accident (LTA) format.

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 already has records or documents of observing and controlling pests and the use of registered pesticides, for example at KJGE, namely:

- Based on the beneficial plant monitoring documents, it is known that the company has utilized beneficial plants as one of the implementations of integrated pest control, namely *Turnera Subulata* and *Antigonon leptopus* as host plants for *UPDKS* predators. The company has a host plant maintenance program for the period January to October 2022 with 6 planned rotations until December 2022.
- Based on the Barn Owl Boxes monitoring document per. October 2022, it was discovered that the company had used *Tyto alba* as a method of biological pest control, for example at KJGE there are Barn Owl Boxes scattered throughout the Division which are generally in good condition and are in active condition.
- The CH has an integrated pest management work program for 2022, including a caterpillar census conducted every 1 months and a rat census conducted every 3 months. For example, there are results of the census of caterpillars in September 2022 in Divisions I, II and III KJGE with no caterpillar pest attacks. Meanwhile, the percentage of rat infestations based on the results of the October 2022 census is only around 2%, so there is no need to control rat pests using rodenticides

The pesticides used at KJGE in 2022 include Roll Up 480 SL, the active ingredient Isopropyl Amina Glyphosate 480 g/l with WHO 2009 classification Slightly hazardous (Class III) with RI distribution permits. 01030120042133 active period September 03<sup>rd</sup>, 2023 for controlling narrow leaf weeds. In addition, there is a pesticide brand Garlon 670, the active ingredient Triclopyr Butoxy Ethyl Ester with an active distribution permit period of April 16<sup>th</sup>, 2023 for controlling broad leaf weeds and woody weeds.

The results of the field visit in Block K49 Division I KJGM found beneficial plants and owl cages and these areas showed no signs of pest attack.



The Plasma Division conducted a census of plant pests and diseases, for example based on the results of the caterpillar pest census in Division 5 KSPR, Division 6 Budi Karya, Division 7 KP Berkah Lestari and Division 8 Tri Manunggal Abdi no caterpillar attacks were found. Pest attacks only have rat attacks but are still below the threshold so pest control is not needed, such as rat pest attacks in Division 5 KPSR Panca residents by 1.53%, in Division 6 Budi Karya 1.67%, in Division 7 KP Berkah Lestari 1.59% and in Division 8 Tri Manunggal Abadi 1.46%.

Plasma has developed natural predators such as Tyto Alba and made barn owl boxes throughout plasma as there are 57 barn owl boxes in Division 5 KPSR Panca Warga, 25 barn owl boxes in Division 6 Budi Karya, 45 barn owl boxes in Division 7 KP Berkah Lestari and 38 barn owl boxes in Division 8 Tri Manunggal Abadi.

Based on the explanation above, it is concluded that the unit of certification has an IPM Plan that is implemented and monitored to ensure effective pest control

### 7.1.2

Based on document review, interviews with the Estate Manager, and field observations at KJGE and KJNP there were no invasive species used for plant pest control. The company controls plant pests and diseases including using biological methods by developing Beneficial Plants in the form of *Turnera Subulata* and *Antigonon leptopus*, and these species are not invasive in Indonesia.

Based on the description above, it shows that the company does not use invasive species that are introduced according to applicable regulations

### 7.1.3

As explained in indicator 7.1.1, the units of certification at KJGE and KJNP do not use fire to control pests and plant diseases. The company carries out EWS by means of a census of pests and diseases according to the determined rotation and census points. The company prioritizes the control of plant pests and diseases using biological methods, namely through the development of beneficial plants, including using the types *Turnera Subulata* and *Antigonon leptopus*.

Based on the description above, it shows that the company does not use fire in controlling pests and plant diseases

Status: Comply

## 7.2

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

#### 7.2.1

The CH has procedures related to the use of pesticides, including those contained in Immature Maintenance SOP No. SOP/SMART/MCAR/X/TA-PTB, July 15<sup>th</sup>, 2020. The SOP is a guide to ensure that all maintenance activities during the Immature period are carried out to maximize growth ahead of production. In addition, there is Mature Maintenance SOP No. SOP/SMART/MCAR/XII/TA-PTM, July 15<sup>th</sup>, 2020. The SOP is prepared as a guideline for carrying out Mature maintenance activities in accordance with management policies and achieving company goals and environmental sustainability

In the use of pesticides, not all areas are sprayed with pesticides, but the areas that are sprayed are circle and harvesting path and collection point. To determine the need for spray volume per hectare, the company calibrates the spray equipment, nozzles, and road speed so that the dosage and volume of the spray solution is correct and not excessive. The company has determined the pesticides used for weed control, for example the active ingredient Glyphosate to control Imperata, broad and narrow leaf weeds, and the active ingredient Methyl Metsulfuron to control legume weeds, wild taro, ferns and young wood.

As for controlling pests and plant diseases, the company prioritizes biological methods, namely through the development of Beneficial Plants *Turnera Subulata* and *Antigonon leptopus*.

Based on the description above, it shows that the company has justification for using pesticides and prioritizes selective application methods to deal with targeted pests, weeds or diseases.

#### 7.2.2

The CH shows the realization of the use of pesticides in 2022 at KJGE and KJNP. For example, the use of pesticides at KJGE with the trademark Roll Up for the active ingredient Glyphosate in January-October 2022 was 3,982.68 Lt and Garlon 2,590.13 Lt. The active ingredient in Round Up 486 SL is Isopropyl amine glyphosate, with an oral and dermal LD50 >5,000 mg/Kg<sup>3</sup> and the active ingredient Erkaforon 20 WG, namely Methyl metsulfuron with an oral and dermal LD50 >5,000 mg/Kg<sup>3</sup>

Based on the description above, it shows that the company has records of the use of pesticides including the active ingredients used and the LD50 of these active ingredients

### 7.2.3

As explained in indicators 7.2.1 and 7.2.2 that the unit of certification at KJGE and KJNP prioritizes pesticide products and methods of application selectively so that it shows a graph of a decrease in pesticide use. To determine the need for spray volume per hectare, the company calibrates the spray equipment, nozzles, and road speed so that the dosage and volume of the spray solution is correct and not excessive. To suppress the growth of weeds, the company developed a legume plant of the *Mucuna Brachteata* type. According to field observations, this plant grows in block K50 Division 1 KJGE.

As for controlling pests and plant diseases, the company prioritizes biological methods, namely through the development of Beneficial Plants of the *Turnera Subulata* and *Antigonon leptopus* types.

Based on the description above, it shows that the company has minimized the use of pesticides according to the IPM plan

### 7.2.4

The CH has procedures/policies related to pesticide mitigation contained in the Pest and Plant Disease Control procedure documents with document numbers SOP/SMART/MCAR/VII/TA-HPT that HPT control must be in accordance with the results of the census. This census system includes the detection and counting of new attacks of pests and plant diseases which is carried out continuously throughout the plantation area, making it useful for monitoring the main pests of oil palm such as leaf pests (fire caterpillars and bagworms), rats, tiratabha, termites and diseases. oil palm plants. Pest control is carried out if the census results show moderate to severe attack categories. In addition, HPT control prioritizes biological methods including the development of Beneficial Plants of the *Turnera Subulata* and *Antigonon leptopus* types.

Based on the description above, it shows that the company does not use pesticides preventively to prevent pests and diseases

### 7.2.5

The CH has a commitment to reduce the use of paraquats, including in the Memorandum of President Director No. 044/PD/IX/2014 dated November 21<sup>st</sup>, 2014 concerning the use of paraquats. The memorandum contains the company's commitment to reduce paraquat by  $\pm 30\%$  starting in 2015 and no longer use Paraquat in 2018. In addition, on August 13<sup>th</sup>, 2015, the President Director issued memorandum No. 032/PD/VIII/2016 concerning the Use of Paraquat which states that since early 2016 there has been no more use of paraquats to eradicate weeds. On December 16, 2015, the President Director issued memorandum No. 050/PD/XII/2015 to MDO, MD SVC, CFO, CEO, Dir Proc, VPA and Div. Head of CPRC regarding paraquat stock. In the memo, MDO and MD SVC were asked to coordinate to arrange the return of all remaining paraquat stock at the end of 2015 to PT. Rolimex. All VPAs must ensure that by early 1 January 2016 there is no further use of paraquats.

Based on the results of field observations, interviews with field supervisors and stock taking of paraquat at KJGE and KJNP warehouses that this Paraquat type pesticide is no longer used in the certification unit.

Based on the description above, it shows that the company does not use pesticides that are included in the World Health Organization (WHO) Class 1A or 1B list or are included in the Stockholm or Rotterdam Conventions and paraquat

### 7.2.6

The CH can show that pesticide applicators are carried out by employees who have attended pesticide training. The following are some of the trainings that have been conducted internally by the company:

- Training on mixing pesticides, spray simulation and first aid in case of exposure to pesticides which was held on August 25<sup>th</sup>, 2022 which was attended by 18 KJGE Division 2 maintenance employees
- Hazardous and toxic waste, hazardous and toxic materials and OHS training at KJGE on 12 September 2022 which was attended by 6 KJGE Division 1 spray employees

Observation of plasma was carried out on Saturday December 3<sup>rd</sup>, 2022 and on Saturday there was no field work. The auditor was not able to make observations regarding spray work in the field, but based on the results of interviews with spray employees it was found that these employees could explain the technical spray work and safety aspects at work

Based on the description above, it shows that pesticides are applied by employees who have attended pesticide training.

#### **7.2.7**

Based on the results of field observations in the KJGE chemical warehouse and KNJP, pesticides are placed in separate places in rooms with walls, rooms equipped with adequate exhaust vents and ventilation, washing facilities available and MSDS available. In addition, pesticides are not mixed with other materials, there are facilities for mixing pesticides, there are emergency response facilities such as eyes washers and sufficient sand, Toxic and Hazardous Materials warnings and symbols, and there is an MSDS.

Based on the description above, it shows that the company already has a place to store pesticides with the best practices

#### **7.2.8**

Unit of certification can show documents for recording and monitoring used pesticide containers by using a logbook of incoming and outgoing goods at the Agrochemical warehouse. In addition, the company also has a pesticide storage procedure contained in Waste Management SOP Number SOP/SMART/LEMS-EHSD/SADV/I002 which was approved by the Sustainability Division Head on July 1, 2014. The procedure describes pesticide storage mechanism carried out according to recommendations provided in MSDS, placement of materials chemicals that have dissimilar characteristics must be separated according to MSDS recommendations, preparation and release of chemicals is carried out first in first out (FIFO), chemical containers must have labels, chemicals are only issued on request approved by the authorities and record storage and release well-documented agrochemicals (including pesticides). Unit of certification has also socialized to agrochemical application officers regarding the ban on the use of hazardous waste packaging including used pesticide packaging on June 2022.

Based on field observations at the agrochemical warehouse and hazardous waste storage area at Kijang POM and Kijang Estate, it is known that the pesticide storage area is specially provided with adequate ventilation and an isolated location. Meanwhile in Kijang Plasma, agrochemical which will be used is taken from Kijang Estate and will be mixed in Rinse House. Rinse house has been equipped by emergency response equipments such as fire extinguishers, showers, eyewash, first aid kits. Used pesticide packages classified as Hazardous Waste were also found stored in a well-monitored Hazardous Waste storage warehouse which was then handed over to licensed collectors. Unit of certification shows last hazardous waste was transported on 25 October 2022, which PT Primanru Jaya did as a licensed hazardous waste transporter.

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

#### **7.2.9**

Weed and Plant Pest control at KJGE and KJNP is done manually and chemist. Based on interviews with the KJGE nursery chemist foreman and field observations at the KJGE nursery, it is known that pesticides are sprayed using a knapsack sprayer and have never sprayed pesticides through the air.

Based on the information above, it shows that the company does not spray pesticides through the air

#### **7.2.10**

The certification unit has conducted regular health checks every 1 year, while special health checks for employees who handle pesticides every 6 months. For example, there are special health checks in the form of cholinesterase and spirometry for employees who handle pesticides, including for pesticide workers in warehouses, spray foremen, pesticide applicators, pesticide mixing operators, etc. which were carried out on February 15<sup>th</sup>, 2022 and August 14<sup>th</sup>, 2022 with a total of 59 employees.

Based on the results of periodic health checks and special health checks at KJGE and KJNP, there were no employees whose health status had decreased due to pesticides, so there was no medical recommendation for all of the pesticide applicator employees. However, the KJGE and KJNP paramedic teams recommend all pesticide applicators to continue to wear complete PPE while working, reduce smoking and eat nutritious food so that the body is maintained healthy.

Based on the description above, it shows that the company has a record of the results of a special medical examination for pesticide operators and evidence of follow-up on the results of the inspection

### 7.2.11

The company has procedures and policies related to pesticides, including prohibiting pregnant women, nursing mothers and workers with poor health from working in jobs that use pesticides. Based on the results of interviews with spray employees at the KJGE Nursery, it is known that female employees who are pesticide applicators are required to check themselves at the clinic once a month so that it can be known that pregnant women are not allowed to do work related to pesticides.

Based on the description above, it shows that there is no work related to pesticides carried out by employees pregnant or breastfeeding women.

**Status: Comply**

### 7.3

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

#### 7.3.1

Unit of certification has identified waste from operational activities contained in the F/SMART/LEMS-EHSD/SADV/001/001 document. The identification is grouped based on the activity that generates waste, name of waste, code of waste, type of solid or liquid, and its management. Determination and classification of waste codes using Government Regulation number 22 of 2021. Unit of certification also has several procedures related to waste management and utilization listed in Waste Management SOP document Number SOP/SMART/LEMS-EHSD/SADV/I002 which was approved by the Sustainability Division Head. dated July 1, 2014. The procedure explains, among others:

- POME quality testing is carried out at the outlet in accordance with the company's internal provisions and laws and regulations and reports the results of the liquid waste testing to the relevant agencies.
- Emissions and ambient air quality testing is carried out in accordance with company internal and statutory regulations and reports the results of emission and ambient testing to the relevant agencies
- Chemical or agrochemical packaging waste is collected then rinsed and recorded in a logbook of former chemical packaging. After that, the waste is stored in a designated place and can be reused for similar activities and/or returned to the supplier and/or in accordance with the MSDS. The remaining rinse water is reused for the process of mixing agrochemicals.
- Hazardous waste in the form of used oil, used batteries, used oil filters, Hazardous contaminated cloth rags and other types of Hazardous waste produced, is managed by being collected at a licensed Hazardous waste storage and handed over to a licensed third party.
- Medical waste in the form of used syringes, expired drugs, and others is treated like hazardous waste and is carried out in collaboration with a licensed third party for destruction.
- Shell and fiber waste is used for boiler fuel
- Empty bunch are applied as organic fertilizer in oil palm plantations.
- Boiler ash produced can be applied to paving roads or applied to land.
- Domestic solid waste in the form of household and office waste is disposed of at the Final Waste Disposal Site (Landfill).

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

#### **Hazardous and Toxic Waste**

In managing hazardous and toxic waste, unit of certification does not reuse it, but only temporarily stores located at Kijang POM and Kijang Estate. Unit of certification also has hazardous waste storage area that has permit based on Permit of Hazardous and Toxic Waste Management for temporary storage activities in PT Buana Wiralestari Mas based on One Stop Investment and Services Office of Kampar Regency Decree Number 503/Per.B/2020/29 dated 18 August 2020 and is valid for 5 years. The permit refers to Recommendation Letter from Environmental Agency number 660/DLH-PPKL/REK-LB3/2020/26 dated 29 June 2020. The permit is valid for 2 storages owned by unit of certification namely those located at Kijang POM (N: 00° 49 ' 54' 107" and E 101° 02' 38,196") and Kijang Estate (N 00° 50' 00.7" and E 101° 03' 01.0").

The waste stored in temporary storage will then be transported by a licensed party every 3 months. The latest transportation is evidenced through electronic manifest document and the minutes of transportation carried out on 25 October 2022 for PT Buana Wiralestari Mas by PT Primanru Jaya which is a licensed party. Unit of certification can show a cooperation agreement with the carrier, which is based on Agreement Number 151/EPMD/SPK-Pengelolaan LB3/BWL-PJ/IX/2022 which was made on 22 September 2022 and valid until 21 September 2025. Unit of certification can also show the legality documents of the carrier such as a valid transportation permit from Ministry of Environment and Forestry, a special freight transportation permit from the Ministry of Transportation that is still

valid, Business Identification Number which is still valid as well as agreement between the transporter and the licensed processing/utilization party.

Unit of certification can also show documents for storing and handling Hazardous Waste in accordance with their SOPs and Government Regulation Number 22 of 2021. These documents include manifest, balance sheet, and logbook. Based on the results of the document review by comparing the manifest, balance sheet and logbook, it can be seen that the data on waste transported on 25 October 2022 is in accordance with data recorded in the balance sheet and logbook for period before transportation is carried out. Similarly, comparison between months after the transportation was carried out (October 2022) starting from empty. Unit of certification records all waste that enters and leaves temporary storage properly so that waste management data can be tracked easily and there are no recording differences.

Results of field visit to hazardous waste temporary storage in Kijang POM and Kijang Estate also show that the company has carried out hazardous waste management quite well. All obligations listed in waste storage permit have been fulfilled, such as availability of fire extinguishers, showers, eyewash, coordinates, alarms, first aid kits, oil traps and appropriate labelling. In addition to good lighting and air ventilation, unit of certification also has drainage channels on the outside of storage to anticipate pollution to the surrounding environment. Result of interview with storage managers also show that managers fully understand procedure for hazardous waste management and mitigation actions in the event of potential pollution. Unit of certification has also reported result of hazardous waste management which is carried out quarterly with evidence of Hazardous Waste Management Report for Kijang POM and Kijang Estate for third quarter of 2022, which was reported to Environmental Agency of Kampar Regency on 22 November 2022.

#### **Non-hazardous and toxic waste**

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

Result of field observations in landfill and housing complex area showed that there were no traces of combustion. All domestic waste was disposed of in waste collection tanks scattered throughout the building with the classification of organic and inorganic waste types. Result of interview with resident of housing complex also stated that unit of certification routinely carried out socialization related to domestic waste management, either directly through meetings, or indirectly by installing signboards prohibiting burning trash and littering.

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

Solid waste from the FFB processing process in the form of shells and fibre is reused by unit of certification as a substitute for fossil fuels (solar) for power generation in boilers, while for empty fruit bunches, it is used to substitute fertilizer applied to plantation land. Some of the solid waste in the form of shells is also sent or sold, while for the empty bunch, some is given to the community as plasma plantation management to be used as fertilizer. Data on solid waste utilization is explained in more detail in indicator 7.9.1. In domestic liquid waste management, unit of certification also has Domestic Wastewater Disposal Permit to Surface Water for PT Buana Wiralestari Mas – Kijang POM based on Decree of Head of One Stop Investment and Services Office of Kampar Regency Kampar Regency Number 503/DPM-PTSP.PEL/LD/2020/65 which was ratified on 23 October 2020 and valid for 5 years.

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

#### **7.3.2**

Based on interview result with managers of Hazardous Waste Storage in Kijang POM and Kijang Estate, it was found that they had an understanding of the handling of waste disposal, including domestic waste and hazardous waste management in accordance with unit of certification procedures. Besides, interview result with manager of storage in Kijang Plasma, it was found that manager had an understanding of the handling of waste disposal, including domestic waste and hazardous waste management in accordance with unit



of certification procedures. Result of interview with workers living in housing complex area also stated that waste management carried out by unit of certification was very good and regular. Trash cans are provided properly, all waste disposal facilities have also been provided by unit of certification such as organic and non-organic waste bins that will be replaced if damaged, hazardous waste storage and landfills. The resource persons also understand very well how to separate the types of waste they produce and what types of waste should not be reused. The respondent's understanding of waste management is the result of routine and consistent socialization and training as evidenced by the minutes that were held in June 2022, to all staff and employees of Kijang Estate. Field observations in the residential area of Kijang POM and Kijang Estate also showed that the housing conditions were quite clean and there was not a lot of scattered garbage. Meanwhile, based on interview with landowner in Kijang Plasma shows that they live in their own houses in surrounding community.

### 7.3.3

Unit of certification does not carry out open burning to destroy waste. This can be proven from field observation result in housing complex and landfill in Kijang POM and Kijang Estate, no traces of burnt waste were found. Result of interview with workers also stated that they had never burned waste because they were aware of the prohibition on burning activities and the sanctions they would receive if they burned them. Organic waste from housing and inorganic waste is disposed of in the bins that have been provided, then transported every 2 times a week and disposed of in landfills and then buried when it is full. Result of field observation in housing complex areas also show many warnings to prohibit waste burning activities as well as the dangers that can arise from burning activities. Interview result with management also explained that the regulations regarding the prohibition of burning have been understood by all workers and strict action would be taken if they violated them.

Status: Comply

## 7.4

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

### 7.4.1

The CH shows documents related to soil fertility management procedures contained in the Management Committee Agronomy and Research document Number (MCAR SOP/SMART/MCAR/IX/TA-TNM effective date 15 July 2020 concerning stages and work instructions for oil palm plantations, as follows:

- SOP for Fertilization (Doc. No. SOP/SMART/MCAR/IX/TA-PPK, dated 15 July 2020. The SOP was prepared as a guideline for conducting fertilization in accordance with management policies. The SOP explains the process of Fertilizing Seedlings, Immature Plants (TBM) and Nuts Implementation of Mature Fertilization (Inorganic Fertilization, and Utilization of Palm Oil By Products).
- Handling of Nutrient Deficiencies (Doc. No. LAMP/IX/TA-PPK/01 Handling of Nutrient Deficiencies, dated 15 July 2020, which explains the symptoms, causes and measures to prevent nutrient deficiencies of Nitrogen (N), Phosphorus (P), Potassium (K), Magnesium (Mg), Copper (Cu), Iron (Fe), Boron (B), as well as observations of deficiencies in the field and categories of observations of deficiency symptoms in the field
- Work Instructions for Fertilizing Peanuts (Doc. No. IK/SMART/MCAR/IX/TA-PPK/02-Peanut Fertilization, dated 15 July 2020, *Puereria Javanica* and *Calopogonium Mucunoides* Fertilization and *Mucuna Bracheteata* Fertilization. There is an Appendix I to *Puereria Javanica* and *Calopogonium Mucunoides* Fertilization and *Mucuna Bracheteata* Fertilization
- Work Instructions for Inorganic Fertilization at TBM (Doc. No. IK/SMART/MCAR/IX/TA-PPK/03-Inorganic Fertilization at TBM, July 15 2020.
- Work Instructions for Fertilizing Oil Palm Empty Bunches at Immature Area (Doc. No. IK/SMART/MCAR/IX/TA-PPK/04-EFB Fertilization at Immature Area, July 15<sup>th</sup>, 2020, including preparation of manual EFB loading, preparing retail personnel and loading EFB the means of transport, EFB application and checking the results of the application.

The CH at KJGM and KJNP have managed soil fertility, including through organic and inorganic fertilization, preparation of fronds in dead fields and planting legumes to maintain soil moisture. This is in accordance with field observations that in Block K52 Division 1 KJGE there is an EFB.

Based on the description above, it shows that the company has records of the implementation of good cultivation practices to manage soil fertility so that yields are optimal and have minimal impact on the environment

### 7.4.2

The CH has leaf and soil analysis procedures as the basis for the fertilization program as stated in work instructions number IK/SMART/MCAR/IX/TA-PPK/06 concerning Soil Sampling Unit (SSU) and work instructions no IK/SMART/MCAR/IX/ TA-PPK/05 concerning Leaf Sampling Leaves (LSU).



The CH at KJGE and KJNP have carried out leaf analysis and soil analysis as the basis for fertilization. For example, in KJGE there are Leaf Analysis Results no. 130/DAUN/LAB-SMARTRI/IV/2022 which was carried out on March 28, 2022. The leaf samples used were 118 samples by analyzing the condition of the leaves, namely. N, P, K, Mg, Ca, B, Cu, Zn, Mn, Fe and Cl.

The implementation of the Soil Analysis was carried out by Analytical Lab SMARTRI on August 11 2022. 390 leaf samples were used to analyze nutrient content, including Texture, pH, C Org, N Tot, P, K, Mg, Exchange Base, P Bray, CEC, and H-Al exchange

Based on the description above, it shows that the company has records of leaf and soil analysis activities on a regular basis to monitor and manage changes in soil fertility and plant health

#### 7.4.3

The CH has utilized empty fruit bunches and POM liquid waste as an alternative method for managing soil fertility and optimizing non-organic fertilizers based on leaf analysis and soil analysis which are conducted regularly. For example, the unit of certification has carried out fertilization at KJGE in accordance with predetermined recommendations, including the use of fertilizer for the period January-October 2022, it is known that 241,194 Kg of Urea fertilization, 218,620 Kg of MOP Fertilizer, 62,460 Kg of Kieserite Fertilizer and 2,521 Kg of NPK 15 Fertilizer.

In the period from January to October 2022 there were 187,514 m3 of Liquid Waste Applications at KJGE which were applied to an area of 750.06 Ha.

Based on the description above, it shows that the company already has a strategy for recycling empty fruit bunches, liquid waste and optimizing non-organic fertilizers

#### 7.4.4

The CH has conducted leaf and soil analysis as a basis for the 2022 fertilizer application at KJGE and KJNP. Fertilization activities have followed the fertilization recommendations. As an example, the certification unit shows the realization of fertilization at KJGE for the period January-October 2022, including UREA 241,194 Kg, MOP 218,620 Kg, Kieserite 62,460 Kg, CIRP 50,763 Kg, HGFB 14,981 Kg, TSP 160,671 Kg, NPK Compound 30,768 Kg, NPK 15,64. 2,521 kg, Bayfolan Fertilizer 18,194 Lt and Agrobland/CRF 166 Kg. Fertilization in Plasma includes RP Fertilization in KUD Tri Manunggal Abadi 73,000 Kg, Urea Fertilization 116,250 Kg, MOP Fertilization 146,450 Kg. Urea Fertilization in KUD Panca Warga 151,000 Kg and MOP Fertilization 187,000 Kg.

Based on the description above, it shows that the company already has records of fertilizer use

Status: Comply

### 7.5

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

##### 7.5.1

Based on the results of the 2019 soil survey and a 1:50,000 scale semi-detailed soil map made by the PMNP Division of PT. SMART, It is known that the unit certification area does not have areas with steep slopes but is on a slope of 0 – 40% or 0 – 22°. In addition, there are 4 soil classifications namely *Typic Haplosaprist*, *Typic Endoaquepts*, *Aquic Dystrudepts*, and *Typic Dystrudepts*. For example, in KJGE and KJNP there are no areas with the *Typic Haplosaprist* classification, so they have a land suitability class that includes the marginally appropriate category (S2) and has the potential to be planted with oil palm.

Based on the description above, it shows that the company has maps that identify marginal and vulnerable lands, including land with steep slopes

##### 7.5.2

In accordance with Indicator 7.5.1, there are no areas with steep slopes in the KJGE and KJNP units of certification. Based on a 1:50,000 scale semi-detailed soil map prepared by the PMNP Division of PT. SMART. It is known that the certification unit area does not have areas with steep slopes but is on a slope of 0 – 40% or 0 – 22°. Replanting activities at KJGE have been carried out since 2019.

Based on the description above, it shows that replanting of oil palm is not carried out extensively on steep slopes according to applicable

regulations

### 7.5.3

In accordance with Indicator 7.5.1, there are no areas with steep slopes in the units of certification in the KJGE and KJNP. Based on a 1:50,000 scale semi-detailed soil map prepared by the PMNP Division of PT. SMART, It is known that the area of the certification unit does not have an area with a steep slope but is on a slope of 0 – 40% or 0 – 220. The unit of certification has not carried out new plantings since 2002. Currently the unit of certification is in the process of replanting work which began in 2019 at KJGE.

Based on the description above, it shows that there is no new planting of oil palm carried out on steep slopes according to applicable regulations.

**Status: Comply**

### 7.6

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

#### 7.6.1

Based on the results of the 2019 soil survey and a 1:50,000 scale semi-detailed soil map made by the PMNP Division of PT. SMART, It is known that the unit certification area does not have areas with steep slopes but is on a slope of 0 – 40% or 0 – 22°. In addition, there are 4 soil classifications namely *Typic Haplosaprist*, *Typic Endoaquepts*, *Aquic Dystrudepts*, and *Typic Dystrudepts*. For example, in KJGE and KJNP there are no areas with the *Typic Haplosaprist* classification, so they have a land suitability class that is included in the marginally appropriate category (S2) and has the potential to be planted with oil palm.

Based on the description above, it shows that the company has evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep slopes, in planning and operating

#### 7.6.2

In accordance with indicator 7.6.1 it is known that the unit of certification does not carry out extensive planting on marginal and fragile soils but planting activities are carried out in accordance with the best practice soil management plan. Based on the results of the 2019 soil survey and a 1:50,000 scale semi-detailed soil map made by the PMNP Division of PT. SMART, It is known that there are 4 soil classifications in the unit certification area, namely *Typic Haplosaprist*, *Typic Endoaquepts*, *Aquic Dystrudepts*, and *Typic Dystrudepts*. For example, in KJGE and KJNP there are no areas with the *Typic Haplosaprist* classification, so they have a land suitability class that includes the marginally appropriate category (S2) and has the potential to be planted with oil palm. The certification unit has not carried out new plantings since 2001. Currently the certification unit is in the process of replanting work which began in 2019 at KJGE.

Based on the description above, it shows that the unit of certification does not carry out extensive planting on marginal and fragile soils, but planting is carried out in accordance with the best practice soil management plan

#### 7.6.3

Based on the results of the 2019 soil survey and a 1:50,000 scale semi-detailed soil map made by the PMNP Division of PT. SMART, It is known that the unit certification area is on a slope of 0 – 40% or 0 – 22°. In addition, there are 4 soil classifications namely *Typic Haplosaprist*, *Typic Endoaquepts*, *Aquic Dystrudepts*, and *Typic Dystrudepts*. For example, in KJGE and KJNP there are no areas with the *Typic Haplosaprist* classification, so they have a land suitability class that includes the marginally suitable category (S2) and has the potential to be planted with oil palm. Based on the results of field observations at KJGE and KJNP, several low land areas, the certification unit has made water channels inside the block to flow to collection channels parallel to the collection road and main road so that water can flow and not stagnate in the middle of the block.

Based on the description above, it shows that the company has used soil and topographical survey information as a guide in planning drainage and irrigation systems, roads and other infrastructure.

**Status: Comply**

### 7.7

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

#### 7.7.1, 7.7.2, 7.7.3, 7.7.4, 7.7.5, 7.7.6, 7.7.7

The unit of certification shows the results of a soil survey and a semi-detailed soil map of the area of PT. Buana Wiralestari Mas, Kampar Regency, Riau Province in the Kijang Mas Estate and Kijang Kencana Plasma in 2019 carried out by the PMNP (Plantation

Monitoring and Planning) Division that the existing land classification consists of *Typic Endoaquepts*, *Aquic Dystrudepts*, and *Typic Dystrudepts* and there are no areas included in the peat soil classification. KJGE and KJNP do not have peat areas so they do not require a drainability study before replanting. In addition, there is no special management in planting because there is no peat area.

Based on the description above, it shows that this indicator cannot be applied in the unit of certification.

**Status: Comply**

## 7.8

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

#### 7.8.1

Based on documents of *ANDAL* in 1993 and *RKL-RPL* in 1995, result of HCV identification in 2011, as well as river flow maps and water sources, it can be seen that there are several water source points in the operational area, Sialangkalo River which is within the scope of Kijang Estate and Sialangkalo River, Pulut River, Merah River, Putih River, Karas River, and the Pelumpung River which are within the scope of the Kijang Plasma. Based on these documents, it is also known that water source management plan is to test quality of surface water in all the rivers every 6 months, monitoring wells every 6 months and drill wells every 1 year. All tests were carried out by a KAN accredited laboratory (LP-335-IDN). Related to this, unit of certification shows the results of testing the quality of surface water for the period of Semester I 2022 which was carried out on 04-15 March 2022. Unit of certification carried out surface water tests with 22 indicators carried out at 10 sample points of all rivers mentioned above (including either upstream dan downstream of Sialangkalo River, Pulut River, Merah River, Putih River, Karas River, and the Pelumpung River). Based on the analysis of test results for all these locations, it shows that there are several test results parameters that are not in accordance with the applicable quality standards, namely Government Regulation Number 22 of 2021 class 2. Parameters that are not in accordance with the quality standards include BOD and COD. This has been discussed in document of *ANDAL* in 1993 which is stated that this matter happens due to value originating from the upstream of the river is not in accordance with the quality standard. Besides, based on the analysis of the Landsat map, it can be seen that the upstream part of the river has been dominated by oil palm plantations and community settlements. Unit of certification stated that to reduce pollutant load that enters their management area, Vetiver grass and Guatemala grass are planted to reduce the rate of infiltration of pollution into water bodies.

Unit of certification also does not limit access to clean water, and all workers also have access to adequate clean water. Based on result of field observation in Kijang POM and Kijang Estate housing complex as well as interviews with fertilizer workers, spraying workers, and harvest workers, information was obtained that clean water facilities for housing were obtained from drilled wells provided for every 2 houses. Drinking water testing is also carried out by the company to see the quality of drinking water taken from drilled wells carried out by a KAN accredited laboratory (LP-195-IDN) on 04-15 March 2022. The results of testing the quality of drinking water also show that all parameters of the test results are still in accordance with the standards. The applicable quality is the Regulation of the Minister of Health Number 492 of 2010. Meanwhile, the results of the monitoring well test will be explained in indicator 7.8.3. Besides, based on result of field visit to Kijang Plasma, workers live in their own houses in surrounding community. However, their access to drinking water whether from wells or surface water is not limited by unit of certification.

Unit of certification also has a river border management plan which is described in SOP for Water Resources Management and Monitoring number SOP/SMART/BCOS-EHSD/SADV/II/004. For those with the status of rivers and tributaries, follow the rules, namely the width of the river border is 50 meters for each side of the river. Based on result of document verification and field observations to several sampling locations, it shows that unit of certification has carried out activities in an effort to improve water quality, including:

- Conduct outreach to all employees and the surrounding community to maintain water quality.
- Maintain the cleanliness of the environment around water sources so that sources of pollution can be minimized.
- Create program to improve water quality in stages with the provisions of the applicable laws and regulations.
- Report the results of the examination in accordance with the provisions of the applicable laws and regulations.
- Testing the quality of river water and drilled wells listed in the environmental management and monitoring report.
- Management of erosion and surface water runoff, management of water in the lowlands and monitoring of surface water quality as stated in the environmental management and monitoring report every semester
- Management of riverbanks and water sources in the form of reservoirs.
- Waste water management using WWTP and its utilization in licensed application areas as well as monitoring the quality of wastewater and monitoring wells
- Monitoring of water use for palm oil processing and evaluation of its use.
- Planting of plant species along riverbanks such as seeds of *trembesi*, *waru*, guava, durian, bamboo, vetiver grass and *guatemala* grass.

### 7.8.2

Unit of certification has procedure related to identification, management and maintenance of water sources and quality which are listed in SOP for Water Resources Management and Monitoring number SOP/SMART/BCOS-EHSD/SADV/II/004. The procedure explains several things related to management of river borders and other water sources, for example in order to protect water resources, determining the width of river borders following Presidential Decree No 32 of 1990, carried out border protection, carried out socialization to all parties involved in plantation operational activities to participate in carrying out water protection activities, making boundary markings, and monitoring water resources. Unit of certification also has an identification of a surface water flow map in the form of a map with a scale of 1:70,000 which includes the scope of certification, namely Kijang Estate and Kijang Plasma. All river boundaries within the Kijang Estate are designated as conservation areas, while those in Kijang Plasma are designated as potential HCV areas where management is similar to own Estate.

In addition, unit of certification also explained the efforts to manage river borders and other water sources that have been carried out such as periodically monitoring the condition of river borders from potential pollution and fires every month, testing surface water quality standards to ensure river water quality is still within normal limits every semester, as well as marking the boundary of the chemical application area in red. In addition, unit of certification also conducts socialization to employees and the surrounding community in conservation efforts which can be proven based on the minutes of socialization to workers in June 2022 and to the community on 11 February 2022. The results of interviews with spraying and fertilizing workers at Kijang Estate and Kijang Kencana Plasma also stated that they were aware of the rules regarding chemical application limits, prohibitions on washing contaminated items chemicals in rivers and other activities that have a negative impact on water sources.

Based on field observation to riparian of Sialangkalo River Block H17, Block I48 dan Block J52 Division III Kijang Estate, unit of certification has also planted woody plants on river riparian such as seeds of *trembesi*, *waru*, *pulai*, etc. Besides, it also shows several activities that have been carried out by unit of certification as a form of protection for river border areas, such as:

- Placing warnings on no hunting, HCV areas, no chemical application and logging and burning of land.
- Applying chemicals prohibition in HCV area with distance of  $\pm 50$  meters on each side of the river.
- Marking management area boundaries (chemical application) with red markings on oil palm trees and HCV area markers.
- Perform manual maintenance on oil palm trees that are still being harvested

### 7.8.3

Unit of certification has facilities for POME management produced from palm oil processing with a capacity of 60-ton FFB/hour using WWTP. POME that has been managed at WWTP will then be used as a fertilizer substitution in Land Application (LA). Before being distributed to the Land Application, all POME is entered into the WWTP with a multi-feeding system which is then processed to reduce pollutant elements so that it is suitable for application to land. Waste treatment facilities owned are as many as 8 ponds consisting of 2 reserve pools, and 6 aerobic pools and 1 small pond as POME reservoir where the outlet is in a holding pond. The size of each pond is 125 m x 30 m x 3 m with a total pool volume of 91,440 m<sup>3</sup>.

Unit of certification also has Permit of Palm Oil Industrial Wastewater Utilization on Soil in Oil Palm Plantations for PT Buana Wiralestari Mas – Kijang POM based on decision of One Stop Investment and Services Office of Kampar Regency Number 503/DPM-PTSP.PEL/LA/2017/13 dated 21 December 2017 which is valid for 5 years with total area permitted for application of 346.16 Ha. The permit also includes an obligation to monitor groundwater quality using monitoring wells located in 3 locations, namely Blocks K18, K21 and J15. Based on result of interview with Environmental Agency of Kampar Regency, it is known that in accordance with Government Regulation No. 5, permit for POME utilization to land is still valid since there is no change in implementation of POME utilization in the company. There is an obligation in the permit document, namely to monitor potential environmental impacts at any time and ensure the quality of POME that will be applied to the land is in accordance with applicable quality standards. The company can show results of recapitulation of POME application to Land Application, which is a total of 182,682 m<sup>3</sup> for the period January-October 2022.

To determine the feasibility of POME quality, unit of certification conducts monthly testing using quality standards that refer to Ministry of Environment Decree No. 28 of 2003. Unit of certification can show evidence regarding the results of the POME quality measurement in the form of document of result of tests carried out by a laboratory accredited by KAN (LP-335-IDN). Based on the results of the analysis of the test results for the period January-October 2022, it shows that all parameters are in accordance with the applicable quality standards. This shows that POME generated from FFB management activities is feasible to be applied to Land Applications. Unit of certification can also show the results of testing on monitoring wells for the period of Semester I 2022 carried out by a KAN

accredited laboratory (LP-335-IDN) on 04-15 March 2022. namely Regulation of the Minister of Health No. 416 of 1990.

In addition, unit of certification also has procedures related to liquid waste management based on waste management SOPs with number SOP/SMART/LEMS-EHSD/SADV/I002 which explains the management of factory, plantation waste, domestic waste, and clinical waste. Unit of certification has also reported the results of liquid waste management which is incorporated in the Environmental Management Report every 3 months and in Report of Management and Monitoring Implementation every 6 months to relevant agencies. Report of Environmental Management for Third Quarter of 2022 has been reported on 22 November 2022 to Environmental Agency of Kampar Regency.

#### 7.8.4

Unit of certification already has Permit of Surface Water Utilization based on Decree of Minister of Public Works and Public Housing Number 645/KPTS/M/2018 dated 4 September 2018 regarding the granting of a water resource exploitation permit to PT Buana Wiralestari Mas – Kijang POM. The water intake location is on the Sialang kalo River with maximum discharge of 36,000 m<sup>3</sup>/month. Unit of certification also has procedures for using water as regulated in Water Treatment Work Instruction number IK/SMART/MCMD/I/TM-PKS/19-Water Treatment which was valid in 2013.

Unit of certification can also show documents for recording daily water use, as well as the results of the recapitulation of water use for palm oil processing units every month, for example for the period January - October 2022. Based on surface water utilization data, the average use of water for FFB processing is equal to 11,336 m<sup>3</sup>/month or equivalent to 0.78 m<sup>3</sup>/ton FFB. However, when calculating the overall water use, the total water use is 113,368 m<sup>3</sup>. Unit of certification also sets a water usage budget of 35,000 m<sup>3</sup>/month, this shows that the company is still using water in accordance with the permitted quota and the specified budget.

Unit of certification can also show proof of payment of the water levy to Regional Revenue Service of Riau Province for period August-October 2022 with the payment period being made every month. The last example of proof of payment of water levies is based on proof of payment made on 31 November 2022 for the total use of water in October 2022, the water tax paid is not only for the FFB processing process but for all water uses.

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

**Status: Comply**

#### 7.9

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

##### 7.9.1

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

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

Unit of certification has a record of the use of renewable energy or fossil energy are explained on document “*Konversi Fibre dan Shell Terhadap Solar 2022*”. Directly, unit of certification already maximizing the use of renewable energy (fibre & shell) as boiler fuel. For example, use of shells and fiber period January-October 2022 has produces 4,740,554 kWh of electricity from turbine. Renewable energy use per ton of palm product in the mill is 25.96 kwh/ton FFB. Result direct fossil fuel used is 0.22 liter/ton FFB.

**Status: Comply**

#### 7.10

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

##### 7.10.1

Unit of certification has carried out an inventory of GHGs contained in the Greenhouse Gas Emissions Mitigation Program document for the period 2022, based on document analysis, it can be concluded that the company has identified the source of GHG produced by Kijang POM unit and its suppliers. Identification of significant sources of GHG emissions are identified and mitigation plans have been



developed by the company covering mills and plantations. Significant GHG emissions include land use change, POME processing, use of fertilizers and pesticides, use of fossil fuels for operations and transportation. The mitigation plans include, among other things, the correct dosage and application of fertilizers as recommended, reducing reuse and recycling, limiting the use of electricity, transportation and machine maintenance, as well as periodic air quality tests. The company has also reported the results of the GHG calculation to the public which was submitted to the RSPO GHG website.

Reduction of fossil fuels in Kijang POM has been carried out by using fibre and shells for fuel substitution. The company also uses POME to be applied to land with test results from the monitoring period January-October 2022 which show 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 was found that accurate data has been entered into the RSPO GHG Calculator version 4.0. The summary of GHG emissions for the period July 2021-June 2022 is as follows:

**General Information**

Association	No. of Estates/Plantations	FFB Processed (t)	Planted Area (ha)
Own Plantation	5	26,402.18	15,762.89
Group Plantation	7	194,243.82	7,373.79
3rd Party	3	51,000.26	0
<b>Total</b>	<b>15</b>	<b>271,646.26</b>	<b>23,136.68</b>

Production	t/yr
FFB processed	271,646.26
CPO produced	48580.08

**Summary Emissions**

Description	Value	Unit	Description	Value	Unit
CPO	1.74	tCO <sub>2</sub> e/tProduct	Oil palm planted on mineral soil	21257.14	Ha
PK	1.74	tCO <sub>2</sub> e/tProduct	Oil palm planted area on peat	1879.54	Ha
PKO	0	tCO <sub>2</sub> e/tProduct	Total oil palm planted area	23136.68	Ha
PKE	0	tCO <sub>2</sub> e/tProduct	Conservation area (Forested)	0.00	Ha
OER	17.88	%	Conservation area (non-Forested)	530.26	Ha
KER	5.43	%	FFB Production per hectare	22.81	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 <sub>2</sub> e	tCO <sub>2</sub> e/t FFB	Emission Source	tCO <sub>2</sub> e
POME	53247.27	0.20	PK from own mill	0.00
Fuel Consumption	266.52	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	0.00	0.00	Total Crusher Emissions	0.00
Sale of PKS	0.00	0.00		
Sale of EFB	0.00	0.00		
<b>Total</b>	<b>53513.79</b>	<b>0.20</b>		

**Estate / Plantation Field Emissions and Sinks**

Description	Emission (tCO <sub>2</sub> e)			TOTAL
	Own	Group	3rd Party	
<b>Emission Source</b>				
Land Conversion	1643.58	1600.71	0.00	3244.29
CO <sub>2</sub> Emissions from Fertilizer	275.90	4066.60	0.00	4342.49
N <sub>2</sub> O Emissions from Peat	591.45	0.00	0.00	591.45
N <sub>2</sub> O Emissions from Fertilizer	235.12	3417.08	0.00	3652.20
Fuel Consumption	91.96	558.70	0.00	650.67
Peat Oxidation	4313.92	0.00	0.00	4313.92

## Sinks

Crop Sequestration	-1572.63	-1612.00	0.00	-3184.63
Sequestration in Conservation Area	-30.17	0.00	0.00	-30.17
<b>Total</b>	<b>5549.11</b>	<b>8031.09</b>	<b>42840.22</b>	<b>56420.42</b>

## Palm Oil Mill Effluent (POME) Treatment

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

## POME Divert to Anaerobic Digestion

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

### 7.10.2

Unit of certification did not carry out new developments after 2014, but unit of certification continues to manage GHG by conducting an inventory of emission sources. They can show identification documents of activities that generate emissions for the period 2022 for Mills and Plantations. This is done 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 a plan to minimize these emissions is drawn up and implemented.

GHG emission reduction mitigation plan developed by unit of certification is the use of renewable fuels in the form of shells and fiber as substitute for diesel, performing maintenance on operational equipment on regular basis, and utilizing POME in land applications. Unit of certification can show records of GHG mitigation for Estate and Mill units, for example the use of fertilizers according to the dose, routine maintenance of operational vehicles, socialization of the prohibition of burning waste, implementation of efficient use of electricity and integrated pest control to minimize the use of pesticides.

### 7.10.3

Unit of certification has identified source of pollution and mitigation plan contained in identification and evaluation form document of environmental aspects number F/LEMS-EHSD/SADV/001/001. Unit of certification has also carried out management and monitoring related to results of identification and mitigation plans as evidenced through Report of Management and monitoring Implementation of Semester I 2022 and has reported it to Environmental Agency of Kampar Regency on 19 August 2022.

Based on verification of the document, it shows that in the management of air pollution, the certification unit has tested air emissions on boilers and generators as well as ambient air. The test is carried out by a KAN accredited laboratory (LP-195-IDN) on 04-15 March 2022. Based on the analysis of the test results, it can be concluded that there is no value above the applicable quality standard, namely Environment Ministry Regulation Number 07 of 2007 for Boilers, Environment Ministry Regulation Number 13 of 2009 for Gensets and Government Regulation Number 22 of 2021 for ambient air.

In addition, unit of certification has also carried out management for interference from immovable sources. The tests were carried out by accredited laboratory (LP-195-IDN) on 04-15 March 2022. The tests carried out by unit of certification included testing for odor, vibration, and noise in the work area and housing. Based on the results of document verification, it shows that all test results are in accordance with the quality standards set for each applicable statutory regulation.

Result of interview with boiler and generator officers stated that there was never any hearing loss experienced by the informants or other factory workers. Unit of certification has also carried out routine health checks. The resource person also explained that the obligation to use PPE in the work area is an obligation that must not be violated, warnings about the use of PPE and checking the completeness of PPE are also applied in the company.

**Status: Comply**

### 7.11

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

#### 7.11.1

Unit of certification can show SOP for preventing and overcoming land fires in the SOP Emergency Response document Number

SOP/SMART/UMUM/SADV/I/005 approved by the Head of Upstream on July 1, 2014. The scope of the SOP includes planning, prevention, mitigation, post-fire management and reporting and coordination of firefighting and land preparation work, where the procedure explains that land clearing is carried out by mechanical means and Zero Burning. The land clearing procedure is carried out by not burning but doing it mechanically.

Unit of certification also has SOP for New Land Clearing Number SOP/SMART/MCAR/I/TA-PPL dated 15 July 2020 at point 4.6.3 which shows the work process on land preparation by not burning in land clearing activities. Unit of certification can also show documentation of replanting activities using mechanical (heavy equipment) and chipping methods not by burning.

In addition, Golden Agri Recourses (GAR) as the parent of PT Buana Wiralestari Mas also has a policy on social and environmental which was ratified on 8 September 2015 by the Head of Upstream which in point 1.4 explains that the company will implement Zero Burning in all plantation development activities including preparation new planting, replanting, or other development activities.

Based on the results of field observations in the replanting area of Block K51 Division 2 Kijang Estate, information was obtained that there were no signs of land clearing by burning. All land clearing activities used mechanical. Based on interviews with management and Environmental Agency, it was also stated that PT Buana Wiralestari Mas is committed not to burn for land clearing.

#### **7.11.2**

Unit of certification already has procedures related to fire prevention and control. Based on the review of the document, it is known that the fire control techniques owned by the company have referred to the prevailing laws and regulations in Indonesia, including Law Number 18 of 2004, Law Number 32 of 2009, Minister of Environment and Forestry Regulation Number 32 of 2016 and Minister of Agriculture Number 5 of 2018. The fire control and prevention program has been included in the program for Monitoring the Facilities and Infrastructure of the Fire Department for the period of 2022 for example, monitoring Fire Extinguisher, monitoring firefighting equipment and fire simulations. Unit of certification has also managed, monitored, prevented and controlled land and forest fires, including the following:

- Establishment of a firefighting team equipped with the necessary equipment.
- Conducting firefighting drills and increasing the frequency of fire patrols by involving the surrounding community, for example by conducting emergency and fire simulations on 25 July 2022.
- Training on Land Fire Fighting Simulation and Fire Extinguisher Simulation for Emergency Response Team and Kijang Estate and Plasma employees.
- Provide firefighting equipment that refers to the Regulation of the Minister of Agriculture Number 05 of 2018.
- Routinely check firefighting equipment.
- Monthly Fire Extinguisher monitoring with inspection results at the location of fire extinguisher installation with powder, foam and CO2 types in plantations and factories in a ready-to-use condition.

Unit of certification 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, firefighting simulation activities are also running well and the tools used can function optimally. Unit of certification already has complete facilities and infrastructure as shown in the document List of Fire Extinguishing Equipment and Other Equipment with the latest update on 2 December 2022. Based on field observations and at the location of the fire tower, it also shows that the company manages these facilities and infrastructure well, the results of interviews with several employees also stating that unit of certification has made efforts to prevent and control fires through the installation of signboards, socialization, and fire simulations by the firefighting teams of Kijang POM, Kijang Estate firefighting team and members of the Kijang Plasma cooperative.

In addition, unit of certification can also show several documents related to fire management that have been carried out, including:

- Map of fire prone areas including location of fire towers, reservoirs and storage facilities and infrastructure.
- Report document for Firefighting Facilities and Infrastructure for Semester I of 2022 which was reported to Environmental Agency and Plantation Agency of Kampar Regency on 12 August 2022.
- Document preparedness reports on systems, facilities and infrastructure for controlling plantation land fires as well as reports on patrols for preventing plantation fires
- Records of patrolling fire-prone areas for the period July-October 2021 with no fire results. The result of the examination of the document revealed that there have been no fire incidents in the unit of certification's operational areas since the last year. In

addition, as an effort to prevent fires, unit of certification also posted warnings related to fires, prohibiting burning of garbage and so on.

Results of interview with Plantation Agency of Kampar Regency also stated that firefighting equipment owned by unit of certification was sufficient for fire control. Unit of certification has a fire control system which is described in Report of Firefighting Facilities and Infrastructure for Semester I of 2022. The provision of fire prevention infrastructure has referred to the Ministry of Agriculture Number 05 of 2018.

### 7.11.3

Unit of certification already have an Emergency Response Preparedness Team Structure consisting of a coach, daily chairperson, secretary, general assistant, assisted by a fire, security, removal, evacuation, and health team of 15 administrators and 30 members. In addition, in involving the surrounding community to respond in the event of a fire, the company also formed a Fire Care Community team, for example from Kijang Makmur Village with evidence of an Assignment Order Number 140/SPT-KM/003 dated January 3, 2020.

Based on document review, interviews with management units and workers accompanied by simulations of fire extinguishers, it can be seen that unit of certification has human resources capable of preventing and dealing with fires. This is also supported by adequate equipment and routine activities in conducting emergency response team simulations. Emergency Response Team members are employees selected by unit of certification and trained to participate in simulations who are expected to be able to handle emergency conditions, and master the role and security measures. Unit of certification has carried out a simulation of an emergency and fire on 25 July 2022.

In fire management, the company monitors hotspots from the company area so that it can cover the surrounding villages. The company also routinely provides assistance and socialization in the prohibition of land burning activities to minimize the risk of a greater fire that is carried out in conjunction with the management of SIA and HCV.

Status: Comply

### 7.12

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

#### 7.12.1 and 7.12.8

Based on management information and a review of area statement, it was found that there was no additional planting or expansion of the plantation operational area after November 2005. Result of interview with management showed that the last land clearing was in 2001. The results of the document review also show that the year of planting at Kijang Estate and Kijang Plasma consists of 1991, 1992, 1993, 1996 and 2001. Based on this information, it can be concluded that RACP is not applicable. Unit of certification can also show Disclosure of Zero Liability document issued on August 29, 2014, in the document stating that Kijang POM unit has no obligation to carry out remediation and compensation.

#### 7.12.2

The first land clearing was carried out in 1993 to 2002. Based on the verification of land clearing data there was no indication of any new land clearing after 15 November 2018, therefore unit of certification has no obligation to conduct a High Carbon Stock (HCS) study. The area to be managed has HCV assessment carried out which is divided into 2 study documents, including:

#### Scope of PT Buana Wiralestari Mas (Own Estate)

- HCV assessment for Own Estate unit was carried out in January 2010 with final documents in February 2011. The HCV assessment was carried out by the company's internal team consisting of Norman Faried Mustakim (approved RSPO HCV Assessor), Kusuma Widya Rochmah (approved RSPO HCV Assessor) with assisted by Tomi Herdartomo, Nazlya Syahputri and Bambang Setyaji using the 2008 HCV toolkit. The HCV identification assessment was carried out for the scope of PT Buana Wiralestari Mas which consists of Nagamas Estate, Nagasakti Estate and Kijang Estate with total study area of 12,574.55 Ha. Based on the results of the study, the company conducted public consultation on HCV on 28 July 2010 which was attended by 27 participants who were company representatives, and on July 29, 2010 which was attended by 20 participants who were representatives of the surrounding village community and representatives of the sub-district. Peer review was conducted by Dwi R Muhtaman on October 10, 2010.

#### Scope of PT Buana Wiralestari Mas (Plasma)

- HCV assessment for Kijang Kencana Plasma unit which is included in the scope of unit of certification which is carried out separately and can be proven based on Kijang Kencana Plasma Unit Potential HCV Identification in 2011 document with an area of 8147.79 Ha. The survey was carried out by the PT SMART tbk Environment Department consisting of DR. Kunkun J Gurmaya (HCV Assessor Accreditation by RSPO), Firmansyah, Dede M Nasir, Laurentius V Baskara and Yosaphat AR using 2008 HCV toolkit. Peer review conducted by Nyoto Santoso on 28 December 2011.

Based on result of document verification, the company conducted a public consultation on HCV on 28 July 2010 which was attended by 27 participants who were company representatives, and on 29 July 2010 which was attended by 20 participants who were representatives of the surrounding village community and representatives of the sub-district. Peer review was conducted by Dwi Rahman Muhtaman on 10 October 2010. Last updated data on the area of HCV for the entire scope of PT Buana Wiralestari Mas was held in August 2022 and ratified on December 2022 conducted by the HCV Verification Team of PT SMART tbk, based on the study there were several changes in the area of the HCV that became the reference in HCV management until the recertification audit was conducted. The following is the data on the results of the 2010 HCV assessment as well as the results of data updating and re-delineation of the HCV area carried out in 2022 for the scope of PT BWL, among others:

**Scope of PT Buana Wiralestari Mas (PT BWL)**

Estate and Scope (Ha)	HCV Location Area	HCV Type	HCV 2011 (ha)	HCV 2017 (Ha)	HCV 2022 (Ha)
Nagasakti Estate (3,016 Ha)	Cuko River Riparian	1.1; 1.2; 4.1	1.54	1.54	-
	Kampas River Riparian	1.1; 1.2; 4.1	59.24	59.24	65.21
	Banal River Riparian	1.1; 1.2; 4.1	87.47	82.26	88.29
Nagamas Estate (7,193.81 Ha)	Banal River Riparian	1.1; 1.2; 4.1	19.23	19.23	13.2
	Pijar River Riparian	1.1; 1.2; 4.1	41.11	41.11	50.03
	Perbadoran River Riparian	1.1; 1.2; 4.1	115.83	115.83	92.76
	Heloka River Riparian	1.1; 1.2; 4.1	26.60	26.60	36.26
	Durian River Riparian	1.1; 1.2; 4.1	29.10	29.10	28.58
Kijang Estate (2,364.74 Ha)	Sialangkalo River Riparian	1.1; 1.2; 4.1	31.43	31.43	37.65
	Merah River Riparian	1.1; 1.2; 4.1	-	-	12.07
<b>Total</b>			<b>411.55</b>	<b>406.34</b>	<b>424.02</b>

**Scope of PT Buana Wiralestari Mas (Plasma Estate)**

Estate and Scope (Ha)	HCV Location Area	HCV Type	HCV 2011 (ha)	HCV 2017 (Ha)
Kijang Plasma (8147.79 Ha)	Sialangkalo River Riparian	1.1; 4.1	19.61	22.45
	Pulut River Riparian	1.1; 4.1	38.58	42.09
	Karas River Riparian	1.1; 4.1	28.97	31.65
	Merah River Riparian	1.1; 4.1	37.81	43.07
	Putih River Riparian	1.1; 4.1	33.33	40.00
	Pelumpung River Riparian	1.1; 4.1	85.73	79.90
	Cemetery (SP 1 – 8)	6	8.6	5.10
<b>Total</b>			<b>252.63</b>	<b>264.26</b>

Based on the data above, it can be seen that HCV area included in the scope of Kijang POM certification is an area of 49,72 Ha located in 2 locations bordering rivers, while Kijang Plasma HCV area is designated as a potential HCV area which is managed by each cooperative management of Kijang Plasma. The determination of HCV area is based on the width of the 50-meter-wide river border for each side of the river. Based on the data above and when compared to the 2021 HCV Area Management and Monitoring Implementation Report document conducted by the unit of certification, it shows that HCV areas still referred to 2017 HCV delineation. HCV delineation result in 2022 are going to be included in the HCV management and monitoring plan in 2023.

Result of interview with unit of certification and document review show that there are differences between the data on the HCV area and the data on the area statement and basic info, this is because the location names in the area statement and basic info documents refer to actual conditions in the field and not based on the status of the area. The following is a description of the HCV area described referring to actual conditions in the field, including:



Estate	Actual Condition	Area (Ha)	HCV Area (Ha)
Nagasakti Estate	Planted Area	212.42	220.83
	Road	6.66	
	Ditch/Swamp/River	1.75	
Nagamas Estate	Planted Area	140.42	153.5
	Road	5.09	
	Ditch/Swamp/River	4.65	
	Others	3.34	
Kijang Estate	Planted Area	38.01	49.72
	Road	1.25	
	Ditch/Swamp/River	10.46	
<b>Total</b>		<b>424.02</b>	<b>424.02</b>

Based on the above data, it shows that some of the planted areas, roads, ditches, swamps and rivers in the entire Estate are HCV areas. Regarding the replanting activities that will be carried out by the company, PT BWL have a policy to leave the planted areas identified as HCV areas not to be replanted in the future.

### 7.12.3

Based on document submitted by Proforest namely RSPO No Deforestation Consultancy: High Forest Cover Countries, Consultancy report on definitions and recommendations to the RSPO June 2018 as known it is not set HFCL for Indonesia.

### 7.12.4

Based on results of HCV identification, it is known that there is HCV area within the scope of the certification unit referred to HCV delineation in 2017 covering area of 31.34 Ha and for PT BWL an area of 411.55 Ha with several types of RTE species consisting of Mammals, Aves and Herpetofauna. Unit of certification has compiled and determined HCV management plan in Integrated Management Plan for HCV Management and Monitoring for each PT BWL for the 2019-2024 period with scope of management and targets every year. An integrated management plan is developed in consultation with relevant stakeholders and covers areas that are directly managed and takes into account the relevant wider landscape level carried out in conjunction with the preparation of the SIA management plan. Unit of certification manages the HCV area by providing boundary markers, signboards and markers for the boundaries of the HCV area. In addition to the 5-year management plan, unit of certification also has a management plan that is prepared annually which aims to update management and monitoring needs, the annual program for the 2022 period includes:

- Socialization of HCV Area Management and Management of Critically Endangered, Threatened, and/or Protected Species
- Maintenance of HCV attributes by creating, installing and maintaining boundary signs, boundary markers and carrying out monitoring and maintenance of information boards.
- Monitoring of HCVs by conducting surveys for flora and fauna inventory
- Planting rehabilitation plants on riverbanks for the purpose of plant enrichment.

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

- Socialization of the HCV area to Kijang Estate employees on 20-22 June 2022, which was attended by 106 participants.
- There is a report on the realization of the maintenance of the HCV warning board which is carried out every 3 months at the Kijang Estate updated in September 2022. Maintenance action is in the form of clearing bushes.
- There is a schedule for the 2022 HCV patrols updated for January-October 2022 which is conducted once a week at Kijang Estate in all HCV areas. The patrol team in charge of the Kijang Estate security teams
- Kijang Estate primary animal monitoring report is available every 3 months, updated in September 2022 and others.

Unit of certification also has maps of the HCV area, water flow and topography with a scale of 1:70,000, the map is also equipped with information about: map title, cardinal directions, map legend, map update date, and map source. Unit of certification also conducts a review related to management and monitoring activities in 2021 as evidenced in the 2021 HCV Management Plan Review Report which contains evaluation and management and monitoring recommendations as an effort to improve HCV management activities in 2022.

### 7.12.5

Unit of certification has identified the needs of the community as well as the areas needed by the affected community to meet their basic needs, taking into account the potential positive and negative changes in their livelihoods as a result of the unit of certification's operational activities. This can be proven by the presence of potential HCV areas in the Plasma scope. Unit of certification has identified and carried out activities to minimize risks and impacts both for the community and for the environment, for example by providing regular socialization to the community not to apply chemicals in river border areas to avoid pollution, not to clear land by burning, and so on.

Unit of certification has also considered various land tenure and management options to protect the HCV area in a way that also protects the rights and livelihoods of local communities. Since the area managed by unit of certification is entirely already planted with oil palm which is not directly adjacent to the settlement, the level of potential conflict between the HCV area and the community is quite low.

Result of field observations in river riparian of HCV area, it was found that there were no HCV 5 and 6 areas where cultural rights and important places for the surrounding community were not identified in unit of certification area. Unit of certification's environmental conditions both within the scope and in the community, area is almost entirely planted areas of oil palm. Currently, unit of certification also has an agreement with the community who are members of the plasma management cooperative, for example for monitoring and patrol activities, unit of certification has also made an agreement with the community who are active in the company's area not to hunt and trade wild animals.

In addition, GAR Group as the parent of PT RJP and BWL has collaborated with stakeholder NGOs such as OFI (Orangutan Foundation International), PT Ekologika Consultant, TFT (The Forest Trust), ZSL (Zoo Society of London) and BICONS (Biodiversity and Conservation – Migrant Bird Conservation). For academics, GAR has collaborated with IPB Bogor, UGM Yogyakarta, Tanjung Pura University, Pontianak and Padjajaran University. The company has also approached relevant stakeholders, including:

- Submit a list of protected species found in the BKSDA area.
- Provide executive summary to relevant parties such as local government and local communities.
- Socialization regarding HCV is carried out periodically to find out the extent of community understanding of the existence of HCVs in the PT RJP area.
- Make an agreement with the surrounding village to maintain the HCV area in the plantation area.

#### **7.12.6**

Unit of certification already has a policy set forth in the procedure related to the protection of endangered species which was approved by the Head of Upstream on June 25, 2015. The protection measures regulated by the company are as follows:

- The company is committed to protecting and prohibiting the hunting of all types of wild animals that are included in the criteria for rare and endangered that are in the plantation area.
- The company will carry out continuous socialization and training activities on the protection of rare and endangered wild animals and their habitats to employees of contractor companies as well as to the community and other relevant stakeholders around the company.
- The company will investigate every case of violation and provide strict disciplinary sanctions (up to layoffs) to company employees who hunt, maintain, injure, harm and kill rare and endangered wildlife.
- For the management of rare and endangered wildlife both inside and around its concession area, the company will cooperate with government agencies or other competent related institutions.
- The company is committed to evaluating and reporting on the company's performance based on this policy on a regular and open basis through the website and the company's annual sustainability report and continuously involving key stakeholders in the palm oil industry.

Disciplinary measures for workers who catch, harm or collect RTE species are regulated in the Internal Office Memo from MD Services & Project Number 1231/M-Int/MDSP-VIC/XI/11 dated November 25, 2011 regarding the Zero Tolerance Policy towards Endangered Animals. This memo explains that all workers are not allowed to touch, care for, injure, kill protected animals if they are found in the plantation and factory locations. The provisional list of the most important species is the Orangutan, Proboscis Monkey, Elephant, Tiger, Rhinoceros, Peacock, Bird of Paradise, and Bali Starling. If the case is found, it will be reported to the local leadership to be reported to the BKSDA. Violation of this will be subject to maximum disciplinary sanctions by the company until it is reported to the authorities.

In addition, there is a Circular Letter from SMD Operations Number 002/SE-SMDOPS/IX/2010 dated September 20, 2010 regarding

protected animals. This letter explains that all staff and non-staff employees are prohibited from capturing, injuring, maintaining, transporting and trading protected animals alive and dead. In the event of a violation of the prohibition, the company will provide strict sanctions and criminal provisions as stated in Chapter XII Article 40 of the Republic of Indonesia Law Number 5 of 1990 and become the personal responsibility of the perpetrator.

Information related to the application of sanctions for employees in the form of disciplinary action in accordance with the provisions of national law is also listed on the HCV signboard which explains that "anyone who violates will be reported to the authorities with the threat of punishment and fines". The sanction is imposed by the company by giving the first warning letter to employees who violate work rules. Based on the results of interviews with unit of certification's employees regarding animal protection, unit of certification has committed to protecting animals that are within the scope of the unit of certification's management area, such as implementing a ban on hunting, killing and keeping wild animals within the unit of certification's environment. The procedure for animal protection also regulates the existence of sanctions or fines for those who violate these provisions.

In addition, unit of certification has also carried out socialization about the existence of endangered plants and animals to employees and the surrounding community which is shown in the socialization report document which is proven based on the official report which is accompanied by photos and attendance list. HCV socialization for employees was carried out on 20-22 June 2022 which was attended by 106 participants, while for the HCV socialization to the community the details were as follows:

- Socialization of HCV in Kijang Makmur Village on 11 February 2022 which was attended by 3 participants
- Socialization of HCV at Sekijang Village on 25 January 2022 which was attended by 4 participants

Indirect socialization is also carried out by installing information boards and brochures warning signs related to conservation areas and the presence of protected rare plants and animals in places that are easily visible, such as area entrances, regional roads that are often crossed by the community, and other places other strategic areas such as offices, and other public facilities. Result of field observation in sampling point of conservation areas show that unit of certification has managed protected areas such as replanting local plant species, not logging, not using chemicals, and installing HCV signboards as well as prohibiting hunting and burning to avoid and prevent poaching and/or illegal hunting or encroachment on HCV areas. Routine monitoring of HCV areas is carried out by several personnel appointed by unit of certification. Result of interview with several samples of workers also stated that unit of certification had committed to protecting RTE species and provided strict sanctions if anyone violated the applicable regulations. Currently, RTE species such as tigers, bears and orangutans are no longer found. Species that are included in the protected status that are still commonly found are only the Eagle and King Fisher.

#### 7.12.7

Monitoring of protected areas in the period of 2022 is carried out regularly every week to ensure the security of the area. Monitoring activities are carried out in several river border locations and all areas of the company's management. This monitoring is carried out to see the progress of the results of HCV management from the initial stage to the current condition. Unit of certification also monitors the diversity of flora and fauna which is routinely carried out every year by showing the results of HCV monitoring carried out in 2022. The results of observations of fauna in the plantation area still found several types of protected animals that are included in the protection status according to the IUCN, CITES and PermenLHK Number 106 of 2018 includes the tiger root (*Prionailurus bengalensis*) and the buffalo egret (*Bubulcus ibis*), the striped fan (*Rhipidura javanica*) and the striped fan (*Rhipidura javanica*). The results of interviews with employees also stated that the Tiger Root (*Prionailurus bengalensis*) and Stork (*Ciconia episcopus*) species were often found around the HCV area.

Unit of certification also conducts annual monitoring and evaluation for the management of HCV areas where this activity aims to identify risks and impacts on conservation areas and improve protection efforts. Unit of certification also follows up on the improvement of the HCV area management plan which is made every 5 years by involving all relevant stakeholders in the company's operational areas such as the surrounding community, especially the surrounding community and law enforcement. The company also conducts a review related to management and monitoring activities in 2021 as evidenced in the 2021 HCV Management Plan Review Report which contains evaluation and management and monitoring recommendations as an effort to improve HCV management activities in 2022. Based on the results of the review, several management recommendations were obtained, including:

- Make photo documentation that is more complete for each management and monitoring activity that is numerous and appropriate (clear and understandable images) as evidence of activities and complementary to the reporting file. From the photo, it is hoped that changes in the condition of HCV can be visualized.

- Equip the equipment needed for management and monitoring activities in the HCV area (binoculars, special GPS for HCV monitoring, and cameras as a means of documenting management activities)
- Replace the protected species poster by adjusting it to the List of Protected Flora Fauna Types based on *PermenLHK* number 106 of 2018
- Improve the quality of HCV management and monitoring activities in accordance with available recommendations and SOPs
- Adjusting HCV attributes (warnings, stakes and red crosses) in accordance with the company's SOP
- Disseminate the latest regulations and replace the warnings in accordance with *PermenLHK* Number 106 of 2018 regarding protected species and plants.
- Adaptive management strategies based on existing Monitoring activities are expected to be considered by management to make improvements in the future. Monitoring activities for HCV 1, and HCV 4, the knowledge of observers (SPO, HCV PIC and Foreman), regarding animal species is still limited, so that capacity building in recognizing local fauna in HCVs needs to be carried out.

All evaluation results have been reviewed and adjusted to HCV management program in 2022 period. The evaluation results also show an increase in the results of HCV area management where for areas that were previously planted with oil palm then restoration with forestry plants. In addition, management and monitoring of HCVs has been carried out in a participatory manner by involving communities around the plantations, one of which is an agreement with the community to jointly protect the HCV area.

**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-2.1	Certificate holder were not use the certificate and trademark whether on-product or off-product	√
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or √
ASA-2.1	Certificate holder were not use the certificate and trademark whether on-product or off-product	√
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or √
ASA-2.1	Certificate holder were not use the certificate and trademark whether on-product or off-product	√
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or √
ASA-2.1	Certificate holder were not use the certificate and trademark whether on-product or off-product	√
	Status: Comply	



### 3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of Golden Agri-Resources, Ltd against the rules for partial certification was determined through Self-Assessment in accordance with RSPO Certification System clause 5.5.3. A summary of findings is as stated below.

Golden Agri-Resources, Ltd Time Bound Plan (TBP) is explained in table 1.5. Golden Agri-Resources run forty nine (49) mills and one hundred and eighty (180) estates (own and smallholders) in Indonesia and has achieved RSPO certified for thirty-one (31) mills and supply base in Indonesia. Golden Agri-Resources, Ltd has informed the TBP progress, MUTU has considered that Golden Agri-Resources, Ltd is comply with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Golden Agri-Resources, Ltd on 14 June 2022 made by Head of Operations Sustainability.

MUTU has verified partial certification for uncertified unit's subsidiary of Golden Agri-Resources, Ltd based on their Time Bound Plan. There are eighteen (18) uncertified management unit of GAR. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There are no significant land conflicts which have not been declared above.
- The company has followed RSPO requirements regarding the New Planting Procedure and Remediation and Compensation Procedure.
- There are no labor disputes that are not resolved through an agreed process.
- All plantations established since 2005 have been carried out in accordance with applicable laws in the country and there is no evidence of non-compliance with the law in any of the non-certified holdings that have 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><i>Company Group/Holding Statement:</i></p> <p>The company has carried out a Compliance Audit / Internal Compliance Verification (ICV) to see compliance with RSPO standards and also the Set-up System in the Company's units to be certified.</p> <p>There are Compliance Audit (ICV) reports for each company including:</p> <ol style="list-style-type: none"> <li>1. PT Sawitakarya Manunggul – Sawita Mill: Pre-Audit 2015, Compliance Audit 24 - 31 May 2021</li> <li>2. PT Smart Tbk – Bukit Kapur Mill: Pre-Audit 2015, Compliance Audit 15 November 2021</li> <li>3. PT Sinar Kencana Inti Perkasa – Kasuari Mill: Pre-Audit 2015, Compliance Audit 11 October 2021</li> <li>4. PT Agrolestari Mandiri – Pekawai Mill: Pre-Audit 2015, Compliance Audit 01 March 2021</li> <li>5. PT Binawit Abadi Pratama – Perdana Mill: 14 June 2021</li> <li>6. PT Agrokarya Prima Lestari – Kuayan Mill: Pre-Audit 2014, Compliance Audit 13 September 2021</li> <li>7. PT Mitrakarya Agroindo – Tangar Mill: Pre-Audit 2015, Compliance Audit 27 September 2021</li> </ol>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>8. PT Paramita Internusa Pratama – Belian Mill: Pre-Audit 2015, Compliance Audit 28 June 2021</p> <p>9. PT Kresna Duta Agroindo – Rantau Panjang Mill: Compliance Audit 01 November 2021</p> <p>10. PT Kresna Duta Agroindo – Gunung Kombeng Mill: Compliance Audit 15 February 2021</p> <p>11. PT Sawit Mas Sejahtera – Sungai Kikim Mill: <i>Setup System</i>. Compliance Audit 20 September 2021</p> <p>12. Sinar Kencana Inti Perkasa – Sungai Magalau Mill: Compliance Audit 25 October 2021.</p> <p>13. PT Bahana Karya Semesta – Sungai Air Jernih Mill: Compliance Audit 6 December 2021</p> <p>14. PT Bangun Nusa Mandiri – Kenari Mill: Compliance Audit 4 October 2021.</p> <p>15. PT Agrolestari Sentosa – Jalemo Mill: Compliance Audit 11 October 2021</p> <p>16. PT Adi Tunggal Mahajaya – Sako Mill: Compliance Audit 8 November 2021.</p> <p><b>Auditor Verification:</b></p> <p>Internal Audit report available for uncertified management unit:</p> <ol style="list-style-type: none"> <li>1. PT Sawitakarya Manunggul (Sawita Mill and supply base) compliance audit on 24 - 31 May 2021.</li> <li>2. PT SMART (Bukit Kapur Mill and supply base) compliance audit on 15 November 2021.</li> <li>3. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base) compliance audit on 11 October 2021.</li> <li>4. PT Agrolestari Mandiri (Pekawai Mill and supply base) compliance audit on 01 March 2021.</li> <li>5. PT Binasawit Abadi Pratama (Perdana Mill and supply base) compliance audit on 14 June 2021.</li> <li>6. PT Agrokarya Prima Lestari (Kuayan Mill and supply base) compliance audit on 13 September 2021.</li> <li>7. PT Mitra Karya Agroindo (Tangar Mill and supply base) compliance audit on 27 September 2021.</li> <li>8. PT Paramitra Internusa Pratama (Belian Mill and supply base) compliance audit on 28 June 2021.</li> <li>9. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base) compliance audit on 01 November 2021.</li> <li>10. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base) compliance audit on 15 February 2021.</li> <li>11. PT Sawit Mas Sejahtera (Sungai Kikim and supply base) compliance audit on 20 September 2021.</li> </ol>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>12. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base) compliance audit on 25 October 2021.</p> <p>13. PT Bahana Karya Semesta (Sungai Air Jernih Mill and supply base) compliance audit on 6 December 2021.</p> <p>14. PT Bangun Nusa Mandiri (Kenari Mill and supply base) compliance audit on 4 October 2021.</p> <p>15. PT Agro Lestari Sentosa (Jalemo Mill and supply base) compliance audit on 11 October 2021.</p> <p>16. PT Adi Tunggal Mahajaya (Sako Mill and supply base) compliance audit on 8 November 2021.</p> <p>Then there will be additional units in 2022 with the acquisition by GAR of 2 mills and 16 Estates (11 own estates and 5 estate plasma/KKPA). Internal audit activities have not yet been carried out, but prior to the acquisition of these units, GAR has carried out a due diligence or internal assessment so that it can be decided to be acquired by GAR and the internal audit plan to be carried out on these units can be shown, with details as follows:</p> <ol style="list-style-type: none"> <li>1. PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA with an internal audit plan on 17 May 2022.</li> <li>2. PT Harapan Rimba Raya: Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA with an internal audit plan on 17 May 2022.</li> <li>3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA with an internal audit plan on 17 May 2022.</li> <li>4. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be the supply base of Bukit Perak Mill (PT Bumi Permai Lestari) that has been certified with an internal audit plan on 28 March 2022.</li> <li>5. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be the supply base of Bukit Perak Mill (PT Bumi Permai Lestari) that has been certified with an internal audit plan on 28 March 2022.</li> <li>6. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be the supply base of Bumipalma Mill (PT Bumipalma Lestari Persada) that has been certified with an internal audit plan on 8 August 2022.</li> <li>7. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be the supply base of Sungai Magalau Mill (PT Sinar</li> </ol>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Kencana Inti Perkasa) with an internal audit plan on 7 November 2022.</p> <p><i>Notes:</i>  <i>Verification of the realization of the internal audit carried out on the newly acquired units will be carried out at the nearest RSPO surveillance audit activity with the internal audit schedule that has been set.</i></p>
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.12	<p><b>Company Group/Holding Statement:</b>  Several companies under GAR were planted above November 2005, while the HCV assessment process was conducted in the period 2010 – 2013.</p> <p>GAR and its subsidiaries carried out a Remediation and Compensation (RaCP) procedure beginning with Disclosure and Zero Liability reporting to the RSPO via email on 29 August 2014.</p> <p>From 25 companies, 7 of them are certified units, the remaining 18 companies are uncertified units. The following is an update on the RaCP progress as of 11 January 2022 for uncertified units:</p> <p>a) 4 companies have received Concept Note approval from RSPO dated 27 July 2020, namely:</p> <ol style="list-style-type: none"> <li>1. PT Kencana Graha Permai (Delima Estate) – Kalimantan Barat</li> <li>2. PT Agrolestari Sentosa – Kalimantan Tengah</li> <li>3. PT Sumber Indah Perkasa – Papua</li> <li>4. PT Kresna Duta Agroindo – Kalimantan Timur</li> </ol> <p>The company submitted a new Concept Note in collaboration with a third party (PT Lestari Capital). Concept Note Batch 1 includes companies:</p> <ol style="list-style-type: none"> <li>1. PT Kencana Graha Permai (Delima Estate) – Kalimantan Barat</li> <li>2. PT Sumber Indah Perkasa – Papua</li> <li>3. PT Kresna Duta Agroindo – Kalimantan Timur</li> </ol> <p>The latest progress on the revised Concept Note was submitted on 14 January 2022 and is currently still being reviewed by the RSPO Compensation Panel.</p> <p>The company also made the Concept Note Project Batu</p>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>Menangis for PT Agrolestari Sentosa – Kalimantan Tengah, was submitted on 16 December 2021 to RSPO Compensation Panel.</p> <p>b) The LUCA (Land Use Change Analysis) report which is still in the RSPO review process:</p> <ol style="list-style-type: none"> <li>1. PT Kartika Prima Cipta – Kalimantan Barat</li> <li>2. PT Agrolestari Mandiri – Kalimantan Barat</li> </ol> <p>c) The LUCA (Land Use Change Analysis) report is in the process of being revised and will be sent to the RSPO:</p> <ol style="list-style-type: none"> <li>1. PT Cahaya Nusa Gemilang – Kalimantan Barat</li> <li>2. PT Paramitra Internusa Pratama – Kalimantan Barat</li> <li>3. PT Bangun Nusa Mandiri – Kalimantan Barat</li> <li>4. PT Persada Graha Mandiri – Kalimantan Barat</li> <li>5. PT Satya Kisma Usaha (Medan Sari Estate) – Kalimantan Tengah</li> <li>6. PT Binasawit Abadi Pratama – Kalimantan Tengah</li> <li>7. PT Aditunggal Mahajaya – Kalimantan Tengah</li> <li>8. PT Mitrakarya Agroindo – Kalimantan Tengah</li> <li>9. PT Agrokarya Primalestari – Kalimantan Tengah</li> <li>10. PT Buana Adhitama – Kalimantan Tengah</li> <li>11. PT Sinar Kencana Inti Perkasa – Kalimantan Selatan</li> <li>12. PT Sawita Karya Manunggul – Kalimantan Selatan</li> </ol> <p>d) The LUCA (Land Use Change Analysis) report has been approved is PT Satya Kisma Usaha (Batang Gading Estate) – Jambi.</p> <p>The LUCA report proposed to be hold/postponed until the Integrated HCV HCS Report obtains Satisfactory status from the HCVRN, is PT Sawit Mas Sejahtera – Sumatera Selatan (2 reports).</p> <p>HCV assessments for 17 reports was conducted in the period of 2010 to 2018 by external (consultant) and internal parties. The HCV assessment is carried out by a team assessor with a Team Leader who has been approved by the RSPO. The reference for the HCV assessment using the HCV Toolkit 2008. The peer review is carried out by an independent consultant who has also been approved by the RSPO.</p> <p>Assessment of PT Sawit Mas Sejahtera – Sumatera Selatan has used Integrated HCV-HCS with the consultants who have</p>



<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>been licensed in HCVN and HCSA</p> <p>The company continues to follow up on the RaCP process, so that the RSPO timebound for uncertified units can be realized immediately.</p> <p>In the 2021 period, several companies were acquired by GAR according to the notarial deed of amendment dated 04 August 2021, including:</p> <ol style="list-style-type: none"> <li>1. PT Kruing Lestari Jaya</li> <li>2. PT Harapan Rimba Raya</li> <li>3. PT Rimbaraya Tamajaya</li> <li>4. PT Agrolestari Subur Sejahtera</li> <li>5. PT Agrolestari Hijau Sentosa</li> <li>6. PT Kharisma Riau Sentosa Prima</li> <li>7. PT Mitranusa Permata</li> </ol> <p>The company is still collecting information and documentation regarding the fulfillment of RaCP obligations for the newly acquired company. The timeline that has been prepared for the fulfillment of this RaCP is:</p> <ul style="list-style-type: none"> <li>• Submission of Disclosure and LUCA on semester 1 of 2022</li> <li>• Submission of Concept Notes on Semester 2 of 2022</li> <li>• Approval RaCP Proposal on Semester 1 of 2023</li> </ul> <p>For the RaCP process, smallholders scheme will be adjusted to the 2023 timebound along with the new acquisition company.</p> <p><b>Auditor Verification:</b></p> <p>Based on auditor verification, not all uncertified unit conduct new clearing after Nov 2005, but for uncertified unit with land clearing after Nov 2005 has follow RaCP. Detail information of uncertified unit are:</p> <ol style="list-style-type: none"> <li>1. PT Kencana Graha Permai - Kalimantan Barat (Delima Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted a new Concept Note in collaboration with PT Lestari Capital on 14 January 2022, and is currently still being reviewed by the RSPO Compensation Panel.</li> <li>2. PT Agrolestari Sentosa – Kalimantan Tengah (Jalemo Estate, Manuhing Estate, Kajui Estate) concept note get approval from RSPO on 27 July 2020. However, the</li> </ol>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>company submitted the Concept Note Project Batu Menangis on 14 January 2022 and is currently still being reviewed by the RSPO Compensation Panel.</p> <p>3. PT Sumber Indah Perkasa – Papua (Mambruk Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted a new Concept Note in collaboration with PT Lestari Capital on 14 January 2022, and is currently still being reviewed by the RSPO Compensation Panel.</p> <p>4. PT Kresna Duta Agroindo – Kalimantan Timur (Gunung Kombeng Mill, Rantau Panjang Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted a new Concept Note in collaboration with PT Lestari Capital on 14 January 2022, and is currently still being reviewed by the RSPO Compensation Panel</p> <p>5. PT Kartika Prima Cipta – Kalimantan Barat (Muara Tawang Estate), the LUCA report which is still in the RSPO review process.</p> <p>6. PT Agrolestari Mandiri – Kalimantan Barat (Pekawai Mill and supply bases), the LUCA report which is still in the RSPO review process.</p> <p>7. PT Cahaya Nusa Gemilang – Kalimantan Barat (Kenanga Estate), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>8. PT Paramitra Internusa Pratama – Kalimantan Barat (Belian Mill, Belian Estate and Tengkawang Estate), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>9. PT Bangun Nusa Mandiri – Kalimantan Barat (Kenari Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>10. PT Persada Graha Mandiri – Kalimantan Barat (Kapuas Hulu Estate and Sungai Beran Estate), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>11. PT Satya Kisma Usaha – Kalimantan Tengah (Medan Sari Estate), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>12. PT Binasawit Abadi Pratama – Kalimantan Tengah (Perdana Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>13. PT Aditunggal Mahajaya – Kalimantan Tengah (Sungai Ayawan Estate), LUCA report is in the process of being revised and will be sent to the RSPO.</p>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>14. PT Mitrakarya Agroindo – Kalimantan Tengah (Tangar Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>15. PT Agrokarya Primalestari – Kalimantan Tengah (Kuayan Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>16. PT Buana Adhitama – Kalimantan Tengah (Sajiri Estate and Bukit Dua Estate), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>17. PT Sinar Kencana Inti Perkasa – Kalimantan Selatan (Sungai Magalau Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>18. PT Sawita Karya Manunggul – Kalimantan Selatan (Sawita Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>19. PT Satya Kisma Usaha – Jambi (Batang Gading Estate), the LUCA report has been approved in 12 November 2021.</p> <p>20. PT Sawit Mas Sejahtera – Sumatera Selatan, the LUCA report proposed to be hold/postponed until the Integrated HCV HCS Report obtains Satisfactory status from the HCVRN.</p> <p>21. The companies were acquired by GAR on 2021 are PT Kruing Lestari Jaya (Sungai Perak Mill and supply bases), PT Harapan Rimba Raya (Sungai Kedang Mill and supply bases), PT Rimbaraya Tamajaya (Sungai Pahu Estate), PT Agrolestari Subur Sejahtera (Bukit Permai Estate), PT Agrolestari Hijau Sentosa (Bukit Lestari Estate), PT Kharisma Riau Sentosa Prima (Kharisma Estate), PT Mitranusa Permata (Sungai Manunggul Estate). The company is still collecting information and documentation regarding the fulfillment of RaCP obligations.</p>
2.1.3	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<p><b>Company Group/Holding Statement:</b></p> <p>GAR and its subsidiaries planted after January 2010. There are companies that had conducted the RSPO New Planting Procedure (NPP) and have gone through a 30-day public consultation process in April 2014. These companies include:</p> <ol style="list-style-type: none"> <li>1. PT Satya Kisma Usaha – Jambi</li> <li>2. PT Kresna Duta Agroindo – Kalimantan Timur</li> <li>3. PT Mitra Karya Agroindo – Kalimantan Tengah</li> <li>4. PT Binawit Abadipratama – Kalimantan Tengah</li> <li>5. PT Aditanggal Mahajaya – Kalimantan Tengah</li> </ol>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<ol style="list-style-type: none"> <li>6. PT Agrolestari Sentosa – Kalimantan Tengah</li> <li>7. PT Agrokarya Primalestari – Kalimantan Tengah</li> <li>8. PT Buana Adhitama – Kalimantan Tengah</li> <li>9. PT Agrolestari Mandiri – Kalimantan Barat</li> <li>10. PT Paramitra Internusa Persada – Kalimantan Barat</li> <li>11. PT Persada Graha Mandiri – Kalimantan Barat</li> <li>12. PT Bangun Nusa Mandiri – Kalimantan Barat</li> <li>13. PT Kartika Prima Cipta – Kalimantan Barat</li> <li>14. PT Kencana Graha Permai – Kalimantan Barat</li> <li>15. PT Cahaya Nusagemilang – Kalimantan Barat</li> </ol> <p><i>Auditor Verification:</i> Based on auditor verification, not all uncertified unit conduct new clearing after January 2010 but for all uncertified unit with land clearing after January 2010 has follow NPP. Detail information of uncertified unit are:</p> <ol style="list-style-type: none"> <li>1. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base): there is no new land clearing after January 2010</li> <li>2. PT Agrolestari Mandiri (Pekawai Mill and supply base): NPP on 26 April 2014</li> <li>3. PT Binasawit Abadi Pratama (Perdana Mill and supply base): NPP on 8 July 2014</li> <li>4. PT Agrokarya Prima Lestari (Kuayan Mill and supply base): NPP on 26 April 2014 and PT Buana Adhitama (supply base) conduct NPP on 4 June 2014.</li> <li>5. PT Mitra Karya Agroindo (Tangar Mill and supply base): NPP on 26 April 2014</li> <li>6. PT Paramitra Internusa Pratama (Belian Mill and supply base): NPP on 3 June 2014, PT Kartika Prima Cipta (supply base) conduct NPP on 8 July 2014 and PT Persada Graha Mandiri (Supply base) conduct NPP on 6 June 2014.</li> <li>7. PT Sawit Mas Sejahtera (Sungai Kikim and supply base): there is new planting after January 2010 in Sungai Kikim Estate and Sungai Saling Estate, the company not conduct NPP. This is become subject of sanction. For PT Buana Sawit Mas (supply base) conduct NPP on 8 July 2014.</li> <li>8. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base): there is no new land clearing after January 2010.</li> <li>9. PT Agro Lestari Sentosa (Jalemo Mill and supply base): NPP on 26 April 2014</li> </ol>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>10. PT Adi Tunggal Mahajaya (Sako Mill) (under construction): NPP on 25 April 2014, PT Agrokarya Prima Lestari (supply base) conduct NPP on 26 April 2014 and PT Mitra Karya Agroindo (supply base) conduct NPP on 26 April 2014.</p> <p>11. PT SMART (Bukit Kapur Mill and supply base): there is no new land clearing after January 2010.</p> <p>12. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base): NPP on 8 July 2014.</p> <p>13. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base): NPP on 8 July 2014.</p> <p>14. PT Sawitakarya Manunggul (Sawita Mill and supply base): there is new land clearing after January 2010 in Sawita KKPA and company not conduct NPP. This is become subject of sanction.</p>
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8	<p><b>Company Group/Holding Statement:</b></p> <p>No land conflicts. The company has a land conflict resolution mechanism in accordance with the RSPO criteria 4.2, 4.6, 4.7 and 4.8. This procedure is contained in the SOP for handling social conflicts with the registration number SOP/SMART/SCRD/NSDV/II/002 revision 1 dated 18 May 2016 and SOP for Handling Complaints and Dissatisfaction no SOP/SMART/SUST/IV/003 revision 3 dates February 22<sup>nd</sup>, 2022. This procedure regulates mutually agreed upon social conflict resolution. Conflict resolution can be done in a participatory manner and can also be done with a third party (mediator).</p> <p>The company also has a procedure for handling complaints before they develop into conflict. The process in question is SOP/SMART/SUST/IV/003 revision 3 dates February 22<sup>nd</sup>, 2022, handling complaints appropriately and quickly. GAR has initiated to become a member of the RSPO DSF as a “Grower” category.</p> <p>Here recap of complaint progress related to GAR which publish in RSPO Website:</p> <ol style="list-style-type: none"> <li>1. Complaint dated July 11, 2021 to PT SMART Tbk (West Kalimantan Region) regarding the alleged purchase/supply of fresh fruit bunches (FFB) and crude palm oil (CPO) from PT Kapuasindo Palm Industri (PT KPI), a subsidiary of the Kencana Group (not members of the RSPO), who have committed a series of violations</li> </ol>



<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>against workers and indigenous peoples in the district. Last Status RSPO Complaints Panel has issued a decision letter regarding the complaint on 17 January 2022 in which it was decided to terminate the entire complaint. The decision letter has been submitted to both parties, and time is given if anyone wishes to appeal until April 11, 2022. (RSPO Complaint Panel Decision is attached).</p> <p>2. Complaint on 2 March 2020 to GAR (Central Kalimantan Region) from Forest Peoples Program &amp; Elk Hills Research regarding alleged land legality and bribery cases. On the part of GAR itself, GIS-2 analysis for land clearance alerts after November 2014 from discussions with RSPO GIS manager on 21 May 2021 has agreed on the sampling method. GAR's clarification report was sent on September 8, 2021. As for the legal review on anti-bribery policies &amp; practices, the company rejected the ToR for Legal Review on March 26, 2021. Until now the company is still waiting for a further decision from the RSPO. The latest status is as of December 15, 2021, the RSPO is waiting for the results of a review from the consultant.</p> <p>3. Complaint on 19 October 2018 to GAR (Kapuas Hulu Region, West Kalimantan) from the Forest Peoples Program (FPP) &amp; Transformasi Untuk Keadilan – Indonesia (TUK-I) regarding legality. On 26 August 2021, the RSPO Complaint Panel decided to proceed with further investigations. The investigation carried out will be fully funded by the RSPO, and carried out by PROFUNDO Parties. Until now the company is still waiting for a further decision from the RSPO. The latest status is as of December 6, 2021, the RSPO is waiting for the results of a review from the consultant.</p> <p>4. Complaint on 13 October 2014 to PT Kartika Prima Cipta (West Kalimantan) from Forest Peoples Program (FPP) &amp; Transformasi Untuk Keadilan – Indonesia (TUK-I) regarding the FPIC process and 6 other issues. RSPO with the approval of GAR and FPP divides the conflict resolution verification process into 5 phases (phase 1 related to NPP, maximum land holding and new land development, phase 2 related to legality, phase 3 related to smallholders, phase 4 related to FPIC and phase 5 related to HCV), where GAR has responded to phase 5 on 26 August 2021. The information submitted has</p>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>responded to all stages and GAR is currently waiting for a decision from the RSPO Complaint Panel. The latest status as of 15 December 2021, the RSPO Complaint Panel has reached a decision for phase 2 and is awaiting discussion of phases 3 and 4.</p> <p>5. The results of the Compliance Audit conducted for the 2021 period in the uncertified unit that there was no land conflict and the unit had disseminated the SOP for Handling Complaints and Dissatisfaction, Human Rights Policy and SOP for Handling Social Conflicts both internally and externally, in general the FPIC process has been carried out according to procedures, so that there are no land or social conflicts.</p> <p><i>Auditor Verification:</i> Auditor has verified the supporting evidence of above the company statement. There is no land conflicts in the following uncertified management unit:</p> <ol style="list-style-type: none"> <li>1. PT Sawitakarya Manunggul (Sawita Mill and supply base)</li> <li>2. PT SMART (Bukit Kapur Mill and supply base)</li> <li>3. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base)</li> <li>4. PT Agrolestari Mandiri (Pekawai Mill and supply base)</li> <li>5. PT Binasawit Abadi Pratama (Perdana Mill and supply base)</li> <li>6. PT Agrokarya Prima Lestari (Kuayan Mill and supply base)</li> <li>7. PT Mitra Karya Agroindo (Tangar Mill and supply base).</li> <li>8. PT Paramitra Internusa Pratama (Belian Mill and supply base)</li> <li>9. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base).</li> <li>10. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base).</li> <li>11. PT Sawit Mas Sejahtera (Sungai Kikim and supply base)</li> <li>12. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base)</li> <li>13. PT Bahana Karya Semesta (Sungai Air Jernih Mill and supply base)</li> <li>14. PT Bangun Nusa Mandiri (Kenari Mill and supply base)</li> <li>15. PT Agro Lestari Sentosa (Jalemo Mill and supply base)</li> <li>16. PT Adi Tunggal Mahajaya (Sako Mill and supply base)</li> </ol>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>17. PT Kruing Lestari Jaya (Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA)</p> <p>18. PT Harapan Rimba Raya (Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA).</p> <p>19. PT Rimbaraya Tamajaya (Sungai Pahu Estate and Sungai Pahu KKPA), which will be supply base for Sungai Kedang Mill.</p> <p>20. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be the supply base of Bukit Perak Mill that has been certified</p> <p>21. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be the supply base of Bukit Perak Mill that has been certified</p> <p>22. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be the supply base of Bumipalma Mill that has been certified</p> <p>23. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be the supply base of Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa).</p> <p>Based on the auditor's search through news from the internet, no information on land conflicts was found in the above uncertified management unit. However, on the RSPO website (Complaint Panel) there is information about complaints from various stakeholders against GAR and this has been explained by the company regarding the progress of the settlement as described above.</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 4.2	<p><b>Company Group/Holding Statement:</b></p> <p>The company has a procedure for handling employee complaints before becoming into conflicts. The procedure is SOP/SMART/SCRD/NSDV/II/002 revision 1 dated 18 May 2016.</p> <p>Procedures related to employee complaints are regulated in the internal flow of form because employees are included in the category of internal stakeholders. The media of complaint used is an official letter submitted through the worker union or put in the suggestion box provided in strategic locations.</p> <p>During 2021, there were no new complaints regarding employment through the RSPO website, as for the progress of</p>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>previous complaints, they have closed status.</p> <p><i>Auditor Verification:</i></p> <p>There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>There is no list of employee and stakeholder complaint and grievance.</p>
2.1.6	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1	<p><i>Company Group/Holding Statement:</i></p> <p>Companies comply with the regulations in accordance with the requirements of the RSPO 2.1 where there is no violation of the rules that are relevant to the plantation. The company has a mechanism to evaluate compliance with regulations, namely SOP/SMART/UMUM/SADV/1/002. In SOP describes procedures for compliance, completeness and groove sections which explain in detail to evaluate compliance with the legislation.</p> <p>Subsidiaries of GAR which still on going to process HGU consist of:</p> <ol style="list-style-type: none"> <li>1. PT Djuandasawit Lestari (Muara Kandis Estate &amp; Muara Tawas Estate)</li> <li>2. PT Sawit Mas Sejahtera (Sawit Mas Estate)</li> <li>3. PT Bumi Sawit Permai (Bumi Sawit Estate)</li> <li>4. PT Forestralestari Dwikarya (Tanjung Rusa Estate)</li> <li>5. PT Sumber Indah Perkasa (Ujung Tanjung Estate, Sungai Merah Estate)</li> <li>6. PT Ivo Mas Tunggal (Samsam Estate, Ujung Tanjung Estate, Sei Rokan Estate, Nenggala Estate)</li> <li>7. PT Buana Wiralestari Mas (Kijang Estate, Nagamas Estate, Nagasakti Estate)</li> <li>8. PT Ramajaya Pramukti (Ramarama Estate)</li> <li>9. PT Binasawit Abadipratama (Perdana Estate, Lenggana Estate, Semandau Estate, Muara Dua Estate)</li> <li>10. PT Agrokarya Prima Lestari (Muara Tawang Estate, Kuayan Estate, Bukit Sentuhai Estate, Tajur Beras Estate, Seranau Estate)</li> <li>11. PT Buana Adhitama (Sapiri Estate)</li> <li>12. PT Agrolestari Sentosa (Manuhing Estate, Kajui Estate)</li> <li>13. PT Mitra Karya Agroindo (Sungai Nusa Estate)</li> <li>14. PT Aditunggal Mahajaya (Sungai Ayawan Estate)</li> <li>15. PT Satya Kisma Usaha (Medang Sari Estate)</li> <li>16. PT Buana Adhitama (Bukit Dua Estate)</li> </ol>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>17. PT Agrolestari Sentosa (Jalemo Estate)</p> <p>18. PT Binasawit Abadipratama (Perdana Mill)</p> <p>19. PT Agrokarya Prima Lestari (Kuayan Mill)</p> <p>20. PT Mitrakarya Agroindo (Tangar Mill)</p> <p>21. PT Agrolestari Sentosa (Jalemo Mill)</p> <p>22. PT Adi Tunggal Mahajaya (Sako Mill)</p> <p>23. PT Smart Tbk. (Sungai Cantung Estate, Bukit Kapur Estate, Bukit Kapur Mill)</p> <p>24. PT Bangun Nusa Mandiri (Gaharu Estate, Kenari Estate, Kenari Plasma, Gahari Plasma, Kenari Plasma)</p> <p>Beside that, there are some units still on process the land certificate (SHM) consists of:</p> <ol style="list-style-type: none"> <li>1. PT Kresna Duta Agroindo – Gunung Kombeng Mill (Gunung Kombeng Plasma)</li> <li>2. PT Ramajaya Pramukti (Ramarama Plasma)</li> <li>3. PT Satya Kisma Usaha – Sungai Bengkal Mill (Kilis Plasma)</li> <li>4. PT Agrokarya Prima Lestari (Sungai Sambon Plasma)</li> <li>5. PT Djundasawit Lestari (Pandawa Plasma)</li> <li>6. PT Foresta Lestari Dwikarya (Tanjung Rusa Plasma)</li> <li>7. PT Palmindo Biliton Berjaya (Tanjung Sawit Plasma)</li> <li>8. PT Sinar Kencana Inti Perkasa (Sungai Kupang Plasma)</li> <li>9. PT Sawitakarya Manunggul (Sawita Plasma)</li> <li>10. PT Kresna Duta Agroindo (Jakluay Plasma, Bukit Subur Plasma)</li> <li>11. PT Kresna Duta Agroindo (Rantau Panjang Plasma)</li> <li>12. PT Kencana Graha Permai (Kayung Plasma, Kencana Plasma, Kenanga Plasma)</li> <li>13. PT Paramitra Internusa Pratama (Belian Plasma)</li> <li>14. PT Paramitra Internusa Pratama (Muara Tawang KKPA)</li> <li>15. PT Paramitra Internusa Pratama (Kapuas Hulu KKPA)</li> <li>16. PT Mitrakarya Agroindo (Sulin Plasma)</li> <li>17. PT Agrokarya Prima Lestari (Sapiri Plasma)</li> <li>18. PT Adi Tunggal Mahajaya (Sako Plasma)</li> <li>19. PT Kresna Duta Agroindo – Pelakar Mill (Tiga Serumpun Plasma)</li> <li>20. PT Kresna Duta Agroindo – Langling Mill (Batang Gading Plasma)</li> </ol> <p>There are 4 companies which still on process to revise EIA document and temporary storage place for hazardous and toxic waste, consist of:</p> <ol style="list-style-type: none"> <li>1. PT Sinar Kencana Inti Perkasa (Kasuari Mill, Cendrawasih Estate, Nuri Estate, Rajawali Estate)</li> <li>2. PT Sumber Indah Perkasa (Mambruk Estate)</li> </ol>



<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>3. PT Sawit Mas Sejahtera (Sungai Kikim Mill, Sungai Kikim Estate, Sungai Pangi Estate, Sungai Musi Estate, Sungai Saling Estate)</p> <p>4. PT Bumi Sawit Permai (Sungai Enim Estate, Sungai Lematang Estate)</p> <p>In the 2021 period, several companies were acquired by GAR according to the notarial deed of amendment dated August 4, 2021, including:</p> <ol style="list-style-type: none"> <li>1. PT Kruing Lestari Jaya</li> <li>2. PT Harapan Rimba Raya</li> <li>3. PT Rimbaraya Tamajaya</li> <li>4. PT Agrolestari Subur Sejahtera</li> <li>5. PT Agrolestari Hijau Sentosa</li> <li>6. PT Kharisma Riau Sentosa Prima</li> <li>7. PT Mitranusa Permata</li> </ol> <p>The company is still collecting information and documentation related to compliance with legal documents such as HGU, Environmental Documents and SHM (for plasma).</p> <p><b>Auditor Verification:</b></p> <p>Legal process is still going on and there is a detail update progress documented by the company for each year.</p> <ul style="list-style-type: none"> <li>- PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base), there is a legal non-compliance. Supply base for Kasuari Mill are PT Sinar Kencana Inti Perkasa and PT Sumber Indah Perkasa. The legal non compliance which still on process is EIA revision in PT Sumber Indah Perkasa and Hazardous waste permit in PT Sinar Kencana Inti Perkasa.</li> <li>- PT Binawit Abadi Pratama (Perdana Mill and supply base), doesn't have land use title (HGU), the HGU is still on process.</li> <li>- PT Agrokarya Prima Lestari (Kuayan Mill and supply base, doesn't have land use title (HGU), the HGU is still on process. Supply base for Kuayan Mill is PT Agrokarya Prima Lestari and PT Buana Adhitama.</li> <li>- PT Mitrakarya Agroindo (Tangar Mill and supply base, doesn't have land use title (HGU), the HGU is still on process.</li> <li>- PT Sawit Mas Sejahtera (Sungai Kikim Mill and supply base), there is a legal non-compliance. Supply base for Sungai Kikim Mill is PT Sawit Mas Sejahtera and PT Bumi</li> </ul>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>Sawit Permai. The legal non compliance which still on process is EIA revision.</p> <ul style="list-style-type: none"> <li>- PT Agrolestari Sentosa (Jalemo Mill and supply base), doesn't have land use title (HGU), the HGU is still on process.</li> <li>- PT Adi Tunggal Mahajaya (Sako Mill and supply base), there is a legal non-compliance. Supply base for Sako Mill is PT Adi Tunggal Mahajaya, PT Mitra Karya Agroindo and PT Agrokarya Prima Lestari. The legal non compliance which still on process is Land Use Title (HGU).</li> <li>- PT SMART Tbk (Bukit Kapur Mill and supply base), doesn't have land use title (HGU), the HGU is still on process.</li> <li>- PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base, doesn't have land use title (SHM), the SHM is still on process. Supply base for Gunung Kombeng Mill is community's plantation.</li> <li>- PT Bangun Nusa Mandiri (Kenari Mill and supply base), doesn't have land use title (HGU), the HGU is still on process.</li> <li>- PT Djuanda Sawit Lestari: there is an area is still in process for HGU in Muara Wahau Estate (574.58 Ha)</li> <li>- PT Satya Kisma Usaha – Kalimantan Tengah: there is an area is still in process for HGU in Medang Sari Estate (24,41 Ha)</li> <li>- PT Sawit Mas Sejahtera: there is an area is still in process for HGU in Sawit Mas Sejahtera Estate (2,291 Ha)</li> <li>- PT Bumi Sawit Mas: there is an area is still in process for HGU in Bumi Sawit Mas Estate (773 Ha)</li> <li>- PT Sumber Indah Perkasa: there is an area is still in process for HGU in Ujung Tanjung Estate (155.46 Ha) and Sungai Merah Estate (241.54 Ha)</li> <li>- PT Ivo Mas Tunggal: there is an area still in process for HGU Samsam Estate (29.09 Ha), Kandista Estate (158.46 Ha), Nenggala Estate (419.9 Ha), Sei Rokan Estate (102.7 Ha), Ujung Tanjung Estate (557.3 Ha)</li> <li>- PT Buana Wiralestari Mas: there is area is still in process for HGU Naga Mas Estate (253.39 Ha), Naga Sakti Estate (59.79 Ha), Kijang Mas Estate (56.07 Ha)</li> <li>- PT Ramajaya Pramukti: there is an area still in process for HGU Rama Rama Estate (318.76 Ha)</li> </ul>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>- PT Bumipalma Lestari Persada: there is an area still in process for HGU Bumi Palma Estate (39.21 Ha)</p> <p>Then there will be additional units in 2022 with the acquisition by GAR of 2 mills and 16 Estates (11 own estates and 5 estate plasma/KKPA). Internal audit activities have not yet been carried out, but prior to the acquisition of these units, GAR has carried out a due diligence or internal assessment so that it can be decided to be acquired by GAR, with details as follows:</p> <ol style="list-style-type: none"> <li>1. PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA.</li> <li>2. PT Harapan Rimba Raya: Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA.</li> <li>3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA which will be supply base for Sungai Kedang Mill (PT Harapan Rimba Raya).</li> <li>4. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified.</li> <li>5. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified.</li> <li>6. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be supply base for Bumipalma Mill (PT Bumipalma Lestari Persada) which has been certified.</li> <li>7. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be supply base for Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa).</li> </ol> <p>The acquisition company already has legality in the form of HGU, but other legalities such as environmental documents and other permits are being collected and will be completed when an internal audit of the acquisition units is carried out.</p> <p>There are 4 companies which still on process to revise EIA document and temporary storage place for hazardous and toxic waste, consist of:</p> <ol style="list-style-type: none"> <li>1. PT Sinar Kencana Inti Perkasa (Kasuari Mill, Cendrawasih Estate, Nuri Estate, Rajawali Estate)</li> <li>2. PT Sumber Indah Perkasa (Mambruk Estate)</li> </ol>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>3. PT Sawit Mas Sejahtera (Sungai Kikim Mill, Sungai Kikim Estate, Sungai Pangi Estate, Sungai Musi Estate, Sungai Saling Estate)</p> <p>4. PT Bumi Sawit Permai (Sungai Enim Estate, Sungai Lematang Estate)</p> <p>There are some unit still on process the land certificate (SHM) consist of:</p> <ol style="list-style-type: none"> <li>1. PT Kresna Duta Agroindo – Gunung Kombeng Mill (Gunung Kombeng Plasma)</li> <li>2. PT Ramajaya Pramukti (Ramarama Plasma)</li> <li>3. PT Satya Kisma Usaha – Sungai Bengkal Mill (Kilis Plasma)</li> <li>4. PT Agrokarya Prima Lestari (Sungai Sambon Plasma)</li> <li>5. PT Djundasawit Lestari (Pandawa Plasma)</li> <li>6. PT Foresta Lestari Dwikarya (Tanjung Rusa Plasma)</li> <li>7. PT Palmindo Biliton Berjaya (Tanjung Sawit Plasma)</li> <li>8. PT Sinar Kencana Inti Perkasa (Sungai Kupang Plasma)</li> <li>9. PT Sawitakarya Manunggul (Sawita Plasma)</li> <li>10. PT Kresna Duta Agroindo (Jakluay Plasma, Bukit Subur Plasma)</li> <li>11. PT Kresna Duta Agroindo (Rantau Panjang Plasma)</li> <li>12. PT Kencana Graha Permai (Kayung Plasma, Kencana Plasma, Kenanga Plasma)</li> <li>13. PT Paramitra Internusa Pratama (Belian Plasma)</li> <li>14. PT Paramitra Internusa Pratama (Muara Tawang KKPA)</li> <li>15. PT Paramitra Internusa Pratama (Kapuas Hulu KKPA)</li> <li>16. PT Mitrakarya Agroindo (Sulin Plasma)</li> <li>17. PT Agrokarya Prima Lestari (Sapiri Plasma)</li> <li>18. PT Adi Tunggal Mahajaya (Sako Plasma)</li> <li>19. PT Kresna Duta Agroindo – Pelakar Mill (Tiga Serumpun Plasma)</li> <li>20. PT Kresna Duta Agroindo – Langling Mill (Batang Gading Plasma)</li> </ol> <p>Based on auditor verification, there is still progress in obtaining legality documents for the uncertified units so that GAR has included the certification plan for the uncertified units in the timebound plan.</p>

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

#### 3.4.1. Identification of Findings, Corrective Actions and Observations at ASA-1.4 and Recertification Assessment

NCR No.	:		Issued by	:	
Date Issued	:		Time Limit	:	
NC Grade	:		Date of Closing	:	
Standard Ref. & Requirement	:				
Evidence observed (filled by auditor):					
Non-Conformance Description (filled by auditor):					
There is no non-conformity during audit RSPO ASA-1.4 & RC-2.					
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-2.1 Assessment

NCR No.	:		Issued by	:	
Date Issued	:		Time Limit	:	
NC Grade	:		Date of Closing	:	
Standard Ref. & Requirement	:				
Evidence observed (filled by auditor):					
Non-Conformance Description (filled by auditor):					
There is no non-conformity were found in this RSPO ASA-2.1 Onsite Audit.					
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
-	-	-

**3.4.4. Noteworthy Positive Components**

No	Description
1	The company's commitment to implementing a sustainable palm oil management system.
2	Has obtained ISCC and ISPO certificates.
3	Has obtained PROPER certificate with Blue category for period 2020-2021 from Ministry of Environment and Forestry.

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

Public Issues (Institution/ NGO/Community)	Auditor Verification
<b>Plantation, Livestock and Animal Health Agency of Kampar Regency</b> <ul style="list-style-type: none"> <li>Unit of certification has submitted a report on plantation business activities every semester which includes CSR implementation activities.</li> <li>Unit of certification already has a plantation business assessment</li> <li>There have been no incidents of land and forest fires since 2016 at unit of certification or around the unit of certification.</li> <li>There is no issue of disruption to plantation business.</li> <li>Unit of certification already has sufficient facilities and infrastructure for prevention and control of land fires.</li> <li>Unit of certification has carried out CSR activities including in the social, infrastructure, economic, etc.</li> </ul>	<p>Based on result of interview and document review, it is known that there are no negative issues in between unit of certification and agency. This good relationship has been established in a conducive atmosphere until this assessment is carried out.</p>
<b>Manpower and Transmigration Agency of Kampar Regency</b> <ul style="list-style-type: none"> <li>Unit of certification already has CLA, workers' union, and Bipartite Organization which has been approved by the agency.</li> <li>Unit of certification has implemented payment of wages to employees in accordance with applicable regulations.</li> <li>Unit of certification has provided health and employment insurances for all employees.</li> <li>There are no workers with contract status in unit of certification.</li> <li>There are no issues of discrimination, child labour, forced labor and sexual harassment in unit of certification.</li> <li>There are no reports related to industrial relations to the agency.</li> </ul>	<p>Based on result of interview and document review, it is known that there are no negative issues in between unit of certification and agency. This good relationship has been established in a conducive atmosphere until this assessment is carried out.</p>
<b>National Land Agency of Kampar Regency</b> <ul style="list-style-type: none"> <li>There were no complaints from the surrounding community that were submitted to National Land Agency.</li> <li>Unit of certification has submitted regular reports regarding the use of HGU to National Land Agency.</li> <li>Communication between Unit of certification and National Land Agency is going well.</li> </ul>	<p>Based on result of interview and document review, it is known that there are no negative issues in between unit of certification and agency. This good relationship has been established in a conducive atmosphere until this assessment is carried out.</p>
<b>Environmental Agency of Kampar Regency</b> <ul style="list-style-type: none"> <li>Unit of certification has a valid environmental permit, liquid waste disposal permit, and hazardous waste storage permit.</li> <li>Unit of certification routinely submit mandatory reports such as environmental management and monitoring</li> </ul>	<p>Based on result of interview and document review, it is known that there are no negative issues in between unit of certification and agency. This good relationship has been established in a conducive atmosphere until this assessment is carried out.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>implementation report, hazardous waste management report, and POME management report to Environmental Agency.</p> <ul style="list-style-type: none"> <li>Supervision by the agency is carried out every year in the form of field visits. The last field visit was carried out in February 2022 with the result that there were no indications of environmental pollution caused by unit of certification's operational activities.</li> <li>Communication between unit of certification and the Environmental Agency went smoothly.</li> </ul>	
<p><b>Local Village Representative</b> Interviewee:</p> <ul style="list-style-type: none"> <li>Kijang Jaya Village</li> <li>Tanah Tinggi Village</li> </ul> <ul style="list-style-type: none"> <li>Unit of certification absorbs workers from the village.</li> <li>There are no issues regarding environmental pollution due to unit of certification's operational activities in the last 1 year.</li> <li>Unit of certification has socialized about protected animals and conservation areas and put-up signs prohibiting hunting certain animals around the plantation area.</li> <li>Socialization of the prohibition of burning has been carried out for land clearing activities.</li> <li>Unit of certification has carried out CSR activities in 2022 including in the fields of religion, social, economy, education, infrastructure etc.</li> </ul> <p>There is no communication problem between the village and unit of certification and unit of certification always responds to requests from the village.</p>	<p>Based on the results of document verification, information from representatives is appropriate, such as unit of certification already has CSR program and realization, socialization, etc.</p>
<p><b>Former Land Owner of Sekijang Village</b></p> <ul style="list-style-type: none"> <li>At the time of the audit, the previous land owner had moved and died. However, the auditor may conduct interviews with a relative of the previous land owner.</li> <li>Land compensation is carried out through a communication process until an agreement is obtained between the land owner and unit of certification.</li> <li>There were no negative issues that arose regarding the land compensation process.</li> <li>Communication between unit of certification and the previous land owner's family went well.</li> </ul>	<p>Based on result of interview with management and document review, there are no negative issues that need further clarification.</p>
<p><b>Gender Committee (KJGM and KJGE)</b> Head of Gender Committee November, 30<sup>th</sup> and December, 1<sup>st</sup> 2022</p> <p>Based on interviews, information was obtained that the realization of the work program of the gender committee in 2022 had been carried out such as, integrated healthcare centre (<i>posyandu</i>), health checks for young mothers, and socialization regarding sexual harassment and the flow of complaints.</p>	<p>There are no issues that need to be verified further, all information obtained from the results of the interviews has been submitted to the relevant indicators.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Over the past year, there have been no issues related to gender, discrimination, harassment, violence or serious violations of reproductive rights in the corporate environment. At present it is certain that no workers who work with chemicals are pregnant or breastfeeding women, this is because the company has its own policy regarding the prohibition for pregnant or breastfeeding women workers to work in jobs related to chemicals. In addition, female workers are also entitled to menstrual leave and maternity leave.</p>	
<p><b>Labor Union (SPSI: KJGM and KJGE)</b> Head of Labor Union November, 30<sup>th</sup> and December, 1<sup>st</sup> 2022</p> <p>Labor Union have been registered in the Labor Agency Kampar District and there has been no change in management until this audit. Internal meetings or bipartite meetings (between the company and the union) have been documented in the minutes document. The implementation of payroll is in accordance with the determination of the minimum wage in Kampar Regency in 2022. In addition, payment of salaries has been in accordance with the specified time and through the bank transfer. The source also added information that in the last year there were no complaints regarding forced labor, child labor, discrimination or sexual harassment/violence.</p> <p>Then, the heads of the workers' unions from all estate and mill units also stated that in 2022 there will be bipartite negotiations with companies to discuss requests for additional <i>PLN</i> subsidies and the provision of clean water for workers. The conclusion obtained in the agenda was that there was no agreement between the two parties so that the problem was discussed in a mediation meeting with the Manpower and Transmigration Office of Kampar Regency.</p> <p>Apart from that, the unions in all estate and mill units also held other bipartite negotiations to discuss the day off policy for security workers. The conclusion of the negotiations was that</p>	<p>The unit of certification showed documents of the minutes of bipartite negotiations which had been held twice, namely on April 21<sup>st</sup> and August 4<sup>th</sup>, 2022. The agenda discussed requests for additional <i>PLN</i> subsidies and the provision of clean water for workers. The unit of certification also showed documents of minutes of mediation meetings with the Manpower and Transmigration Office of Kampar Regency which had been held three times, namely on September 1<sup>st</sup>, September 21<sup>st</sup> and October 18<sup>th</sup>, 2022. Based on the results of the document review, it is known that there has not been an agreement between the two parties so that the agency will issue a letter of recommendation to resolve the problem. Then, based on the results of interviews with representatives of management and workers' unions, it was found that until the time the audit was carried out, the agency had not issued the letter of recommendation. From the results of field visits to employee housing, it is known that the availability of water in employee homes is clean and suitable for use in meeting daily needs.</p> <p>The unit of certification shows documents on the minutes of bipartite negotiations which were held on February 7<sup>th</sup>, 2022. The agenda discussed the policy</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>no agreement was reached between the two parties, so the matter was discussed in a mediation meeting with the Manpower and Transmigration Office of Kampar Regency.</p>	<p>of imposing a day off for security. The unions gave their opinion as follows:</p> <ul style="list-style-type: none"> <li>• Request that the day off be set for Sunday as stipulated in the CLA for the 2018 – 2020 period and refuse to replace the day off on Sunday on a normal day (Monday – Saturday).</li> <li>• If the company is going to change the day off from Sunday to a normal day (Monday - Saturday), then the union requests that the security work shifts, which have been working 3 shifts so far, be made into 2 shifts with the aim of not reducing security work income.</li> <li>• The labor union also requested that day off be implemented only once a month with consideration of the additional income for security workers.</li> </ul> <p>Then the certification unit also gave an opinion, namely:</p> <ul style="list-style-type: none"> <li>• Setting working hours for security guards is set for 24 hours and 7 days a week according to their functions and duties as security guards in operational areas.</li> <li>• In accordance with the provisions of the applicable law that within 7 working days a week, the unit of certification provides 1 day off as a weekly rest day. To realize this, the unit of certification makes arrangements in such a way that the security's weekly rest day does not coincide, so that there are several security members whose weekly rest day does not fall on Sunday.</li> <li>• The aim of this arrangement is for security members to get sufficient rest time so they can work optimally.</li> </ul> <p>The unit of certification also shows documents of the minutes of the mediation meeting and the Collective Agreement between the employer and the union on March 4<sup>th</sup>, 2022. The document contains information that in the meeting which discussed the issue of determining the day off security schedule, the two parties did not have an agreement so that both parties agreed to proceed to the Industrial Relations Dispute Settlement (<i>Penyelesaian Perselisihan Hubungan Industrial PPHI</i>) stage. Then, based on the results of interviews with representatives of management and workers' unions, it was found that until the time the audit was carried out, the agency has not yet informed the <i>PPHI</i> implementation schedule.</p> <p>Based on the review of the Security Shift Distribution Schedule document, it is known that security has two</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
	<p>days off for one month. The policy regarding the determination of the day off schedule has been approved and signed by both parties (the workers and the company). For example, the Statement Letter signed by the security with the initials HP on September 23<sup>rd</sup>, 2018. The letter explains the day off provisions for security considering the duties and functions of his job are security in the company's operational area. Then, from the results of interviews with security at the KJGM and KJGE units, information was obtained that they understood the duties and functions assigned by the certification unit so that they had no problem working on holidays while being paid a decent wage in accordance with the provisions of the applicable law. And from the results of a study of pay slip documents and details of security overtime hours, it is known that the certification unit has paid overtime wages, the calculation of which is in accordance with applicable policies (<i>PP</i> Number 35 of 2022 and CLA for the 2018-2020 period).</p> <p>In addition, the unit of certification has also submitted related security working hour regulations to the Riau Province Manpower and Transmigration Office as stated in letter number 017/BWLM/XI/2019 dated November 12<sup>th</sup>, 2019. The letter has been approved and signed by the Head of the Manpower and Transmigration Office. Transmigration Riau Province.</p>
<p><b>Employee Cooperative (KJGM dan KJGE)</b> Head of Employee Cooperative November, 30<sup>th</sup> and December, 1<sup>st</sup> 2022</p> <p><b>KJGM</b> Based on the results of interviews with employee cooperative representative, information was obtained that the employee cooperative is engaged in a savings and loan business. There is a principal deposit that is paid when the worker joins for the first time as a member of the cooperative and there is also an obligatory deposit that is paid monthly by the members of the cooperative. Workers register as cooperative members voluntarily. The last RAT was held in March 2021.</p> <p><b>KJGE</b> Meanwhile, based on interviews with the Labor Union in KJGE unit and management representative, information was obtained that the cooperative activities have been on hiatus since 2013. The company has appealed to the workers in the Kijang Estate unit to re-establish the employee cooperative through socialization.</p>	<p>There are no issues that need to be verified further, all information obtained from the results of the interviews has been submitted to the relevant indicators.</p> <p>The company has shown an internal letter addressed to <i>PUK SPSI</i> KJGE regarding the appeal to run an employee cooperative on March 1<sup>st</sup>, 2022. The company has also shown evidence in the form of minutes of a coordination meeting related to employee cooperatives attended by <i>PUK SPSI</i> KJGE and SPO KJGE on March 1<sup>st</sup>, 2022, which discusses the benefits</p>



Public Issues (Institution/ NGO/Community)	Auditor Verification
	of employee cooperatives and their implementation to employees.
<b>Contractor (PT Satrindo Jaya Agropalma)</b> Head of Administration 7 December 2022 <ul style="list-style-type: none"> <li>• The form of cooperation between the contractor and the company is the transportation of FFB to all plantation units and the transportation of CPO to the factory units.</li> <li>• The company routinely conducts outreach to contractors and workers regarding compliance with regulations and policies that apply within the company such as implementing OHS while working, fulfilling labor rights, environmental management and others. The socialization is carried out at least once a year. These provisions are also stated in the work agreement letter.</li> <li>• The contractor has provided PPE for the workers</li> <li>• The contractor has also paid wages according to the minimum wage provisions in force in Kampar Regency and provided other benefits, such as rice allowance.</li> <li>• While working with the company, the contractor said that he had no complaints.</li> <li>• The cooperation and communication that has been established so far has been quite good.</li> </ul>	There are no issues that need to be verified further, all information obtained from the results of the interviews has been submitted to the relevant indicators.

4.0	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>
4.1	<b>Formal Sign-off of Assessment Findings</b>
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>Kijang POM – PT Buana Wiralestari Mas Head of Sustainability Management System and Certification Operations Sustainability</p>  <p><b><u>Yahya Mustakim</u></b> Monday, 19 December 2022</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><b><u>Briyogi Shadiwa</u></b> Monday, 19 December 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	Plantation, Livestock and Animal Health Agency	Kampar Regency		Interview via telephone	30 November 2022	√	
2	Manpower and Transmigration Agency	Kampar Regency		Interview via telephone	30 November 2022	√	
3	National Land Agency	Kampar Regency		Interview via telephone	30 November 2022	√	
4	Environmental Agency	Kampar Regency		Interview via telephone	30 November 2022	√	
5	Local Village Representative Interviewee: • Kijang Jaya Village • Tanah Tinggi Village	Kampar Regency		Interview via telephone	30 November 2022	√	
6	Former Land Owner of Sekijang Village	Kampar Regency		Interview via telephone	30 November 2022	√	
7	Gender Committee	Kampar Regency	-	Direct Interview	November, 30 <sup>th</sup> and December, 1 <sup>st</sup> 2022	√	
8	Labor Union	Kampar Regency	-	Direct Interview and By Phone	November, 30 <sup>th</sup> and December, 1 <sup>st</sup> 2022	√	
9	Employee Cooperative	Kampar Regency	-	Direct Interview and By Phone	November, 30 <sup>th</sup> and December, 1 <sup>st</sup> 2022	√	
10	Contractor (PT SJA)	Kampar Regency	-	By Phone	December 7 <sup>th</sup> , 2022	√	
11	KJGM Workers: • 3 Grading Operator • 2 Loading Ramp Operator • 1 Power House Operator • 2 Boiler Operator	Kampar Regency	-	Direct Interview	December 02 <sup>th</sup> , 2022	√	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
	<ul style="list-style-type: none"> <li>• 1 Sterilizer Operator</li> <li>• 1 Ripple Mill Operator</li> <li>• 1 WTP operator</li> <li>• 1 WWTP operator</li> <li>• 1 Housing complex resident</li> </ul>						
12	KJGE Workers: <ul style="list-style-type: none"> <li>• 3 Maintenance workers</li> <li>• 7 Harvesting workers</li> <li>• 6 Nursery Workers</li> <li>• 1 Land Application operator</li> </ul>	Kampar Regency	-	Direct Interview	December 02 <sup>th</sup> , 2022	√	
13	KJNP Workers: <ul style="list-style-type: none"> <li>• 1 Warehouse Operator</li> <li>• 2 Harvesting Workers</li> <li>• 5 land owners of KOPSA Budi Karya</li> <li>• 5 land owners of KUD Manunggal Abdi</li> </ul>	Kampar Regency	-	Direct Interview	December 03 <sup>th</sup> , 2022	√	
14	WWF	Indonesia	-	By E-mail	November 21 <sup>st</sup> , 2022		√
15	WALHI	Indonesia	-	By E-mail	November 21 <sup>st</sup> , 2022		√
16	AMAN	Indonesia	-	By E-mail	November 21 <sup>st</sup> , 2022		√
17	Sawit Watch	Indonesia	-	By E-mail	November 21 <sup>st</sup> , 2022		√

## Appendix 2. Assessment Program

DATE	28 November, 2, 3, 7 & 8 December 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
<b>Monday, 28 November 2022</b>		
06.05 – 07.45	<b>JAKARTA (CGK) – PEKANBARU (PKU)</b>	<b>All Auditor</b>
09.00 – 12.00	<b>PEKANBARU – PT BUANA WIRALESTARI</b>	<b>All Auditor</b>
14.00 – 15.00	<b>Opening meeting</b> <ul style="list-style-type: none"> <li>Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li> <li>Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li> </ul>	<b>All Auditor</b>
15.00 – 17.00	<b>Verification of Basic Information:</b> <ul style="list-style-type: none"> <li>FFB Production Data</li> <li>Scope of Certification</li> <li>Map</li> </ul>	<b>All Auditor</b>
<b>Friday, 2 December 2022</b>		
08.00 – 12.00	<b>Field Observation to Kijang Estate</b> Aspect to be verified : <ul style="list-style-type: none"> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>Implementation of Occupational Health &amp; Safety Aspect</li> <li>Implementation of Employment Procedure and Mechanism Aspect</li> <li>Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>Interview with related personnel during field observation.</li> </ul>	<b>ELU</b>  <b>FIT</b>  <b>SIA &amp; BRI</b>  <b>FIT</b> <b>SIA &amp; BRI</b> <b>FIT</b> <b>FIT, SIA &amp; BRI</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 17.00	<b>Field Observation to Kijang POM</b> Aspect to be verified: <ul style="list-style-type: none"> <li>Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Dispatch CPO)</li> <li>Occupational Health &amp; Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond)</li> <li>Implementation of Employment Procedure and Mechanism Aspect</li> </ul> <b>Presentation of Daily Progress</b>	<b>FIT</b>  <b>SIA &amp; BRI</b>  <b>ELU</b>  <b>All Auditor</b>
<b>Saturday, 3 December 2022</b>		
	<b>Field Observation to Kijang Kencana Plasma</b>	

DATE	28 November, 2, 3, 7 & 8 December 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 12.00	Aspect to be verified : <ul style="list-style-type: none"> <li>• Implementation of Legal Aspect (Land Ownership, Legal Boundaries)</li> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>• Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> <li>• Implementation of Employment Procedure and Mechanism Aspect</li> <li>• Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>• Interview with related personnel during field observation.</li> </ul> Presentation of Daily Progress	ELU FIT SIA & BRI FIT SIA & BRI FIT FIT, SIA & BRI All Auditor
<b>Wednesday, 7 December 2022</b>		
08.00 – 12.00	Document review and completing audit checklist.	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.00	<ul style="list-style-type: none"> <li>• Document review and completing audit checklist.</li> <li>• Presentation of Daily Progress</li> </ul>	All Auditor
<b>Thursday, 8 December 2022</b>		
10.00 – 12.00	Closing Meeting : <ul style="list-style-type: none"> <li>• Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion)</li> <li>• Comments, Responses and Questions</li> </ul>	All Auditor
12.00 – 14.00	PT BUANA WIRALESTARI – PEKANBARU	All Auditor
17.30 – 19.00	PEKANBARU (PKU) – JAKARTA (CKG)	All Auditor