

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

**[ ✓ ] Initial Certification**

Name of Management Organisation : **Pinang Witmas Sejati POM, PT Pinang Witmas Sejati subsidiary of KLK Bhd**  
Plantation Name : PT Pinang Witmas Sejati - Pasir Salak Estate, Pangkor Estate, and Grik Estate  
Location : Muara Merang Village, Sub District of Bayung Lencir, District of Musi Banyuasin, Province of Sumatera Selatan, Indonesia

Certificate Code : **MUTU-RSPO/179**  
Date of Certificate Issue : 11 January 2023      Date of License Issue : 11 January 2023  
Date of Certificate Expiry : 10 January 2028      Date of License Expiry : 10 January 2024

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
IC	05 to 10 December 2022	Hasiholan Sihombing (Lead Auditor), Radytio Puspanjana, Septian Maulana, Helma Namira	Harso Antena	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
IC	11 January 2023

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**Figure 1. Location Map of PT Pinang Witmas Sejati**

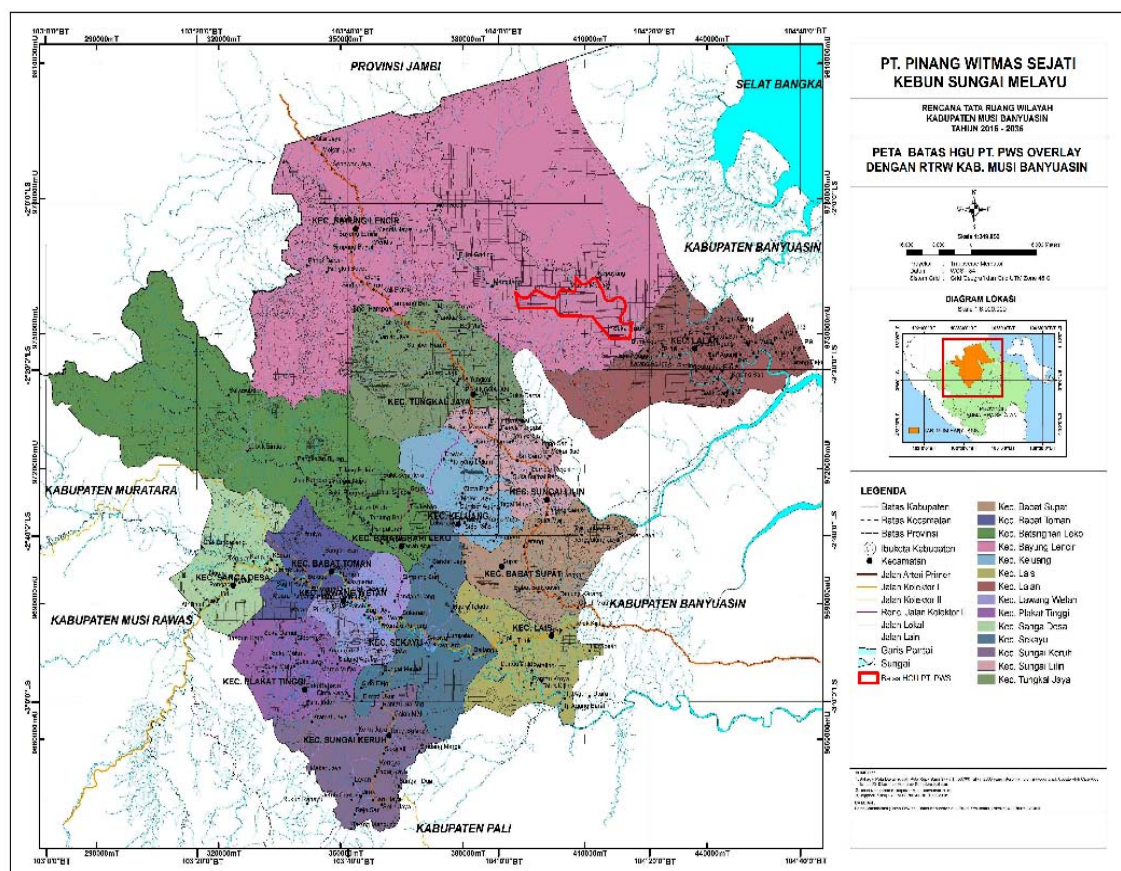
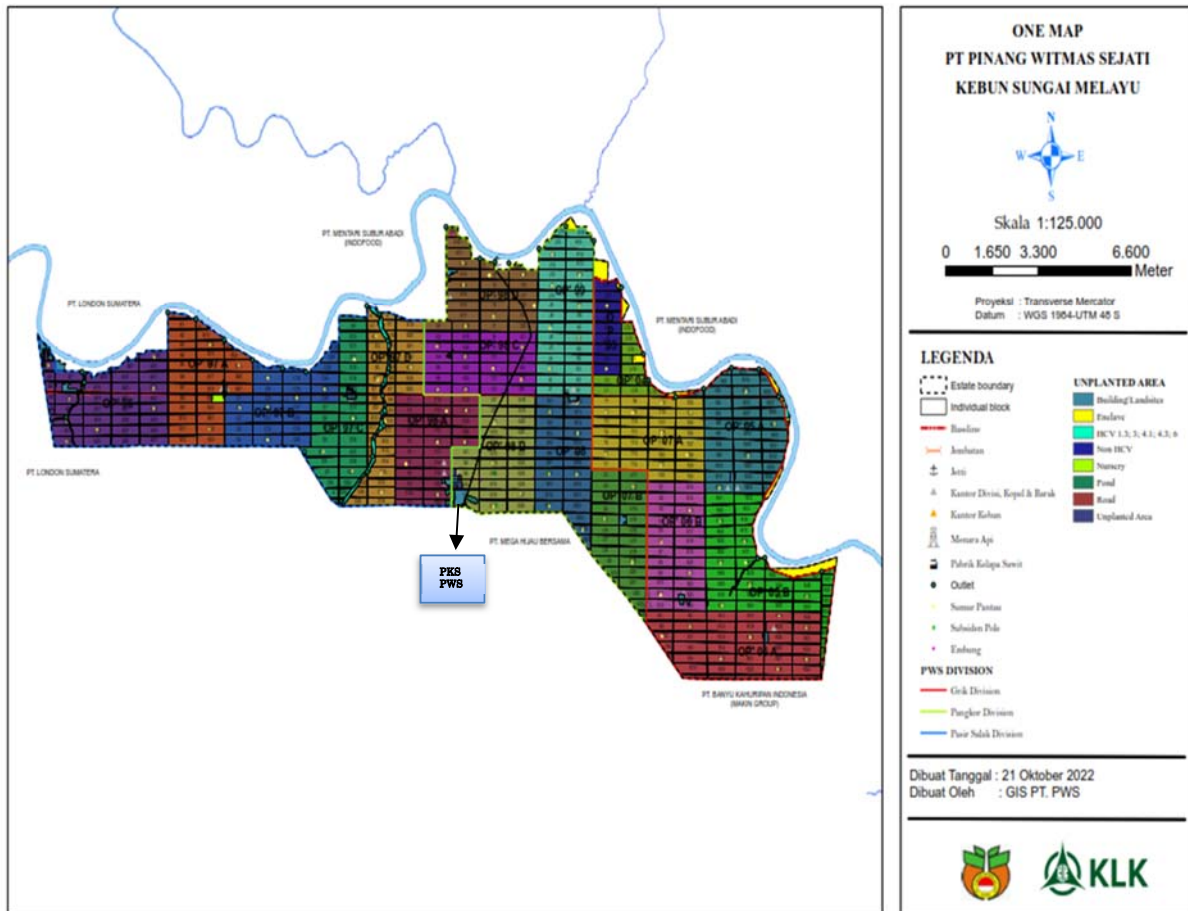


Figure 2. Operational Map of PT Pinang Witmas Sejati



**Abbreviations Used**

AARI	:	Applied Agricultural Resources Indonesia
ANDAL	:	<i>Analisis Dampak Lingkungan</i> /Environment Impact Assessment
B3	:	<i>Bahan Berbahaya dan Beracun</i> / Hazardous Material
BKSDA	:	<i>Badan Konservasi Sumber Daya Alam</i> (Directorate General of Nature Resources and Ecosystem Conservation)
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Security Agency)
CEO	:	Chief Executive Officer
CH	:	Certificate Holder
CITES	:	Convention on International Trade in Endangered Species of Wild Fauna and Flora.
CLA	:	Collective Labor Agreement
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
CV	:	Comanditaire Venotschap
DLH	:	<i>Dinas Lingkungan Hidup</i> (Environment Agency)
DPRD	:	<i>Dewan Perwakilan Rakyat Daerah</i> /Regional People's Representative Assembly
EFB	:	Empty Fruit Bunch
EHS	:	Environment, Health and Safety
EIA	:	Environmental Impact Analysis
FFB	:	Fresh Fruit Bunches
FGD	:	Focus Group Discussion
FPIC	:	Free, Prior, Informed, Concern
GHG	:	Green House Gas
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title)
IC	:	Initial Certification
IPM	:	Integrated Pest Management
ISH	:	Independent Small Holder
IUCN	:	International Union for Conservation of Nature
IUP	:	<i>Izin Usaha Perkebunan</i>
KER	:	Kernel Extraction Rate
KJMB	:	<i>Koperasi Jaya Mitra Bersama</i> /Jaya Mitra Bersama Cooperative
KLK	:	Kuala Lumpur Kepong
KK	:	Family Card Identity
KMS	:	<i>Koperasi Makmur Sakti</i> /Makmur Sakti Cooperative
KTP	:	Resident Identity Card
KTU	:	<i>Kepala bagian Tata Usaha</i> /(Head of administration)
LCC	:	Legume Cover Crop
LD50	:	Lethal Dose 50
LTIFR	:	Lost Time Injury Frequency Rate
MPA	:	<i>Masyarakat Peduli Api</i> /Local Fire Community
MSDS	:	Material safety Data Sheet
NGO	:	Non-Government Organization
UKL/UPL	:	<i>Upaya Kelola Lingkungan dan Upaya Pemantauan Lingkungan</i> (Environmental management and monitoring efforts).
UoC	:	Unit of Certification
UPTD	:	<i>Unit Pelaksana Teknis Daerah</i>
OER	:	Oil Extraction Rate
OFI	:	Opportunity For Improvement

OHS	:	Occupational Health and Safety
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> (Guiding Committee of Occupational Safety and Health)
PGHT	:	Daily Permanent Worker
PIC	:	Person in Charge
PK	:	Palm Kernel
PKO	:	Palm Kernel Oil
PKWT	:	<i>Pekerja Waktu Tertentu</i> / Fixed Term Contract
PKWTT	:	Permanent Worker
POM	:	Palm Oil Mill
PPE	:	Personal Protective Equipment
PPKL	:	<i>Pengendalian Pencemaran dan Kerusakan Lingkungan</i>
PT PMS	:	PT Pelangi Muda Sejahtera
PT PWS	:	PT Pinang Witmas Sejati
PWS	:	Pinang Witmas Sejati
RaCP	:	Remediation and Compensation
RKL/RPL	:	<i>Rencana Kelola Lingkungan/ Rencana Pemantauan Lingkungan</i> (Environmental Management Plan / Environmental Monitoring Plan)
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened and Endangered
SBSI	:	Worker Union (Serikat Buruh Sejahtera Indonesia)
SCCS	:	Supply Chain Certification System
SIA	:	Social Impact Assessment
SOP	:	Standard Operating System
SPK	:	<i>Surat Perjanjian Kerjasama</i> /Work Agreement Letter
SPTP	:	Worker Union (Serikat Buruh Tingkat Perusahaan)
SSOP	:	Sustainability Standard Operating System
TPA	:	<i>Tempat Penitipan Anak</i> (Daycare).
TPSA	:	<i>Tempat Pembuangan Sampah Akhir</i> / (Landfill)
UoC	:	Unit of Certification
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Pond

<b>1.0</b>	<b>SCOPE of the CERTIFICATION ASSESSMENT</b>		
<b>1.1</b>	<b>Assessment Standard Used</b>	<ul style="list-style-type: none"> <li>Indonesia National Interpretation of the RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018, Endorsed by the RSPO Board of Governors on 20th April 2020.</li> <li>RSPO Certification Systems for Principles &amp; Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.</li> </ul>	
<b>1.2</b>	<b>Organisation Information</b>		
1.2.1	Organisation name listed in the certificate	<b>Pinang Witmas Sejati POM, PT Pinang Witmas Sejati subsidiary of Kuala Lumpur Kepong Bhd</b>	
1.2.2	Contact person	Jason Foong	
1.2.3	Organisation address and site address	<b>RSPO registered Company:</b> Wisma Taiko, No 1 Jalan SP Seenivasagam Ipoh/Perak Darul Ridzuan, Malaysia 30000.  <b>Office Address:</b> KLK Agriservindo. Citra Towers, Tower Utara Lantai 22 Jl. Benyamin Suaeb Blok A6, Kebon Kosong, Kemayoran, Jakarta Pusat, DKI Jakarta, 10630, Indonesia	
1.2.4	Telephone	(+62 21) 3952 3900 / (+62 21) 3952 3903 (Ext. 215)	
1.2.5	Fax	(+62 21) 3952 3904	
1.2.6	E-mail	<a href="mailto:jason.foong@klk.com.my">jason.foong@klk.com.my</a>	
1.2.7	Web page address	<a href="http://www.klk.com.my">www.klk.com.my</a>	
1.2.8	Management Representative who completed the application for certification	Jason Foong	
1.2.9	Registered as RSPO member	1-0014-04-000-00, member since 17 October 2004	
<b>1.3</b>	<b>Type of Assessment</b>		
1.3.1	Scope of Assessment and Number of Management Unit	PWS POM and supply bases Pasir Salak Estate, Pangkor Estate and Grik Estate.	
1.3.2	Type of certificate	Single	
<b>1.4</b>	<b>Locations of Mill and Plantation</b>		
1.4.1	Location of Mill		
	<b>Name of Mill</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	PWS POM	Muara Merang Village, Bayung Lencir Sub District, Musi Banyuasin District, Sumatera Selatan Province, Indonesia	S 02° 13' 20.6"      E 104° 10' 32.9"
1.4.2	Location of Certification Scope of Supply Base		
	<b>Name of Supply Bases</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	Pasir Salak Estate	Mangsang Village, Bayung Lencir Sub District, Musi Banyuasin District, Sumatera	S 02° 11' 47.7"      E 104° 05' 53.0"

		Selatan Province, Indonesia		
Pangkor Estate		Muara Merang Village, Bayung Lencir Sub District, Musi Banyuasin District, Sumatera Selatan Province, Indonesia	S 02° 12' 52.3"	E 104° 10' 57.2"
Grik Estate		Muara Merang Village, Bayung Lencir Sub District, Musi Banyuasin District, Sumatera Selatan Province, Indonesia	S 02° 14' 54.4"	E 104° 14' 46.6"
<b>1.5</b>	<b>Description of Area Statement</b>			
1.5.1	Land Tenure			
	• State		<b>14,980.49</b>	<b>Ha</b>
	• Community		-	Ha
1.5.2	<b>Area Statement</b>			
	<b>Area Statement</b>	<b>Pasir Salak Estate (Ha)</b>	<b>Pangkor Estate (Ha)</b>	<b>Grik Estate (Ha)</b>
	Mature area	4,667.90	4,151.40	5,005.00
	Immature area	29.30	257.50	-
	Nursery Area	10.50	-	-
	Building	45.00	43.40	16.10
	Road, Drain	156.30	147.40	163.00
	Pond ( <i>Embung</i> )	11.80	8.30	1.50
	Unplanted Area (football field, former barracks)	6.40	12.20	0.50
	Enclave/Occupation	3.70	11.50	137.30
	HCV	72.00	-	13.20
	Swamp	9.29	-	-
	<b>TOTAL</b>	<b>5,012.19</b>	<b>4,631.70</b>	<b>5,336.60</b>
				<b>14,980.49</b>
<b>1.6</b>	<b>Planting Year and Cycles</b>			
1.6.1	Age profile of planting year			
	<b>Planting Year</b>	<b>Hectarage (Ha)</b>		
		<b>Pasir Salak Estate</b>	<b>Pangkor Estate</b>	<b>Grik Estate</b>
				<b>Total</b>
	1996	956.20	-	-
	1997	2,989.80	-	-
	1998	721.90	1,902.60	-
	1999	-	898.20	-
	2003	-	-	259.70
	2004	-	-	220.60
	2005	-	-	1,831.10
	2006	-	-	1,815.60
	2007	-	644.40	878.00
	2008	-	706.20	-
	<b>Sub Total Mature</b>	<b>4,667.90</b>	<b>4,151.40</b>	<b>5,005.00</b>
				<b>13,824.30</b>

	2022	29.30	257.50	-	286.80		
	Sub Total Immature	29.30	257.50	-	286.80		
	TOTAL	4,697.20	4,408.90	5,005.00	14,111.10		
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 (%)
	PWS POM	90	298,920.08	57,255.70	19.15	15.999,84	5.35
	*Production data source from November 2021 to October 2022						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estates	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/ year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Pasir Salak Estate	5,012.19	4,667.90	66,843.38	14.32	66,843.38	100
	Pangkor Estate	4,631.70	4,151.40	70,896.17	17.08	70,896.17	100
	Grik Estate	5,336.60	5,005.00	124,566.07	24.89	124,566.07	100
	Total	14,980.49	13,824.30	262,305.62	18.97	262,305.62	100
	*Production data source from November 2021 to October 2022						
1.7.3	FFB description from other source						
	Name of sources/Organisation (RSPO certified / non-certified)	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Makmur Sakti Cooperative (RSPO Non-certified)	Independent Supplier	-	-	1,712.82		
	Jaya Mitra Bersama Cooperative (RSPO Non-certified)	Independent Supplier	-	-	34,756.86		
	Trans B1 (RSPO Non-certified)	Independent Supplier	-	-	144.79		
	TOTAL					36,614.46	
	*Production data source from November 2021 to October 2022						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (MT)		
			-		-		
	FFB Processed		-		-		

	CPO Production		-		-			
	Palm Kernel (PK) Production		-		-			
	<i>*Will be verified on surveillance audit</i>							
1.8.2	Product selling							
	Type of selling product	Actual selling product for last year (MT)						
	CSPO sold as RSPO certified product	-						
	CSPK sold as RSPO certified product	-						
	CSPO sold under another scheme	-						
	CSPK sold under another scheme	-						
	CSPO sold as conventional	-						
	CSPK sold as conventional	-						
	<i>*Will be verified on surveillance audit</i>							
1.8.3	Estimate of Certified FFB Claim							
	<b>Name of Estates</b>	<b>Total Area (Ha)</b>	<b>Production Area (Ha)</b>	<b>FFB (tonnes/year)</b>	<b>Yield (tonnes/ha/ year)</b>			
	Pasir Salak Estate	5,012.19	4,667.90	67,000	14.35			
	Pangkor Estate	4,631.70	4,151.40	72,000	17.34			
	Grik Estate	5,336.60	5,005.00	126,000	25.17			
	<b>Total</b>	<b>14,980.49</b>	<b>13,824.30</b>	<b>265,000</b>	<b>19.17</b>			
	<i>*Projected FFB production for 12 months</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	<b>Name of Mill</b>	<b>Capacity (tonnes/ hour)</b>	<b>FFB Processed (tonnes/year)</b>	<b>CPO</b>		<b>Palm Kernel</b>		<b>Supply Chain Module</b>
				<b>Out put (tonnes)</b>	<b>Extraction (%)</b>	<b>Out put (tonnes)</b>	<b>Extraction (%)</b>	
	PWS POM	90	265,000	53,000	20.00	14,575	5.50	MB
	<i>*Projected CPO and PK production for 12 months</i>							
1.9	<b>Other Certifications</b>							
	ISPO			-				
	ISCC			-				
1.10	<b>Time Bound Plan</b>							
1.10.1	<b>Time Bound Plan for Other Management Units</b>							
<b>MANAGEMENT UNIT</b>			<b>LOCATION</b>		<b>Coverage Area</b>	<b>Time Bound</b>	<b>Status</b>	
<b>P O M</b>	<b>Estate (Supply Base)</b>				<b>(Ha)</b>			
<b>INDONESIA</b>								
Berau POM	Malindomas Perkebunan		Berau, Kalimantan Timur		7,971	2019	Certified	
	Hutan Hijau Mas		Berau, Kalimantan Timur		7,317	2019	Certified	

	Koperasi Perkebunan Sawit Mitra Jaya	Berau, Kalimantan Timur	426.50	2022	Certified
Jabontara POM	Jabontara Eka Karsa	Berau, Kalimantan Timur	14,086	2017	Certified 2017
	Koperasi Harapan Sejahtera Bersama	Berau, Kalimantan Timur	866	2022	Certified
	Koperasi Tani dan Nelayan Batu Putih Rimba Perkasa	Berau, Kalimantan Timur	714	2022	Certified
PBJ POM	Putra Bongan Jaya	Kutai Barat, Kalimantan Timur	11,602	2025	Uncertified
MAP POM	Mulia Agro Permai	Baamang, Kalimantan Tengah	9,056	2019	Certified
	Menteng Jaya Sawit Perdana	Mentaya Hilir Utara, Kalimantan Tengah	2,384	2025	Uncertified
KMA POM	Karya Makmur Abadi	Mentaya Hulu, Kalimantan Tengah	13,127	2019	Certified
	Scheme Smallholder	Baamang, Kalimantan Tengah	-	2025	Uncertified
Steelindo Wahana Perkasa POM	Steelindo Wahana Perkasa	Belitung, Bangka Belitung	14,065	2012	Certified 1 January 2015
	Bumi Makmur Sejahtera Jaya		364	2025	Uncertified
	Scheme Smallholder	Belitung, Bangka Belitung	-	2025	Uncertified
Parit Sembada POM	Parit Sembada	Belitung, Bangka Belitung	3,990	2013	Certified 2016
	Alam Karya Sejahtera	Belitung, Bangka Belitung	6,012	2013	Certified 2016
	Scheme Smallholder	Belitung, Bangka Belitung	-	2025	Uncertified
Mandau POM	Mandau	Bengkalis, Riau	11,571	2012	Certified 2012
Nilo POM 1	Koperasi Petani Sejahtera	Pelalawan, Riau	540.95	2022	Certified
	Koperasi Karya Mitra	Pelalawan, Riau	100.05	2022	Certified
Nilo POM 2	Nilo Timur	Pelalawan, Riau	6,681	2014	Certified
	Nilo Barat	Pelalawan, Riau	6,179	2014	Certified
	Ladang Mutiara	Pelalawan, Riau	1,363	2019	Certified

	Koperasi Sumber Rezeki	Pelalawan, Riau	1,200	2018	Certified
	Koperasi Pekantua Jaya	Pelalawan, Riau	196	2018	Certified
	Koperasi Teluk Makmur	Pelalawan, Riau	204	2018	Certified
Tapung Kanan POM	Sekarbumi Alamlestari	Kampar, Riau	6,200	2012	Certified 2013
Stabat POM	Basilam	Langkat, Sumatera Utara	2,337	2014	Certified 2017
	Gohor Lama	Langkat, Sumatera Utara	3,307	2014	Certified 2017
	Padang Brahrang	Langkat, Sumatera Utara	2,024	2014	Certified 2017
	Tanjung Beringin	Langkat, Sumatera Utara	3,936	2020	Certified
Tanjung Keliling POM	Bekiun	Langkat, Sumatera Utara	2,979	2014	Certified 2020
	Maryke	Langkat, Sumatera Utara	2,827	2014	Certified 2020
	Bukit Lawang	Langkat, Sumatera Utara	1,482	2014	Certified 2020
	Tanjung Keliling	Langkat, Sumatera Utara	2,360	2014	Certified 2020
Sinergi POM	Kebun Pertama	Kutai Timur, Kalimantan Timur	10,104	2024	Uncertified
	Kebun Belidan	Kutai Timur, Kalimantan Timur		2024	Uncertified
	Kebun Manubar	Kutai Timur, Kalimantan Timur		2024	Uncertified
	Kebun Multi	Kutai Timur, Kalimantan Timur	3,255	2024	Uncertified
	Kebun Karya	Kutai Timur, Kalimantan Timur	2,928	2024	Uncertified
	Kebun Bakti	Kutai Timur, Kalimantan Timur	1,884	2024	Uncertified
IPS POM	Kebun Kaliorang	Kutai Timur, Kalimantan Timur	3,556	2024	Uncertified
	Kebun Mengenai	Kutai Timur, Kalimantan Timur			

	Kebun KM 08	Kutai Timur, Kalimantan Timur			
Prima POM	Kebun Prima	Bulungan, Kalimantan Utara	7,731	2024	Uncertified
	Kebun Bahagia	Bulungan, Kalimantan Utara	1,310	2024	Uncertified
	Kebun Permai 1	Bulungan, Kalimantan Utara	1,017	2024	Uncertified
	Kebun Permai 2	Bulungan, Kalimantan Utara	3,778	2024	Uncertified
PBJ POM	Kebun PT Putra Bongan Jaya	Kutai Barat, Kalimantan Timur	11,602	2022	Uncertified
Pinang Witmas Sejati POM	Pasir Salak Estate	Musi Banyuasin, Sumatera Selatan	5,012.19	2024	IC on 2022
	Pangkor Estate	Musi Banyuasin, Sumatera Selatan	4,631.7	2024	IC on 2022
	Grik Estate	Musi Banyuasin, Sumatera Selatan	5,336.60	2024	IC on 2022
No POM yet	Kebun Anugrah	Mesuji, Lampung	3,231	2024	Uncertified
	Kebun Bintang	Mesuji, Lampung	2,608	2024	Uncertified
	Kebun Ceria	Mesuji, Lampung	2,674	2024	Uncertified
Segah POM	Kebun Satu Sembilan Delapan	Berau, Kalimantan Timur	5,676	2022	Certified
	Koperasi Perkebunan Sawit Gunung Sari Mandiri	Berau, Kalimantan Timur	488	2022	Certified
	Koperasi Sawit Mekar Sejahtera	Berau, Kalimantan Timur	1,222	2022	Certified
	Koperasi Perkebunan Sawit Labasari	Berau, Kalimantan Timur	1,461	2022	Certified
	Koperasi Mitra Mandiri	Berau, Kalimantan Timur	1,018	2022	Certified
	Koperasi Hidup bersama	Berau, Kalimantan Timur	759	2022	Certified
	Kebun Tekukur Indah	Berau, Kalimantan Timur	1,497	2025	Uncertified
<b>PENINSULAR MALAYSIA</b>					
Batu Lintang POM	Pelam	Kulim, Kedah	2,526	2012	Certified 2013
	Batu Lintang	Serdang, Kedah	2,355	2012	Certified 2013
	Subur	Batu Kurau, Perak	1,290	2013	Certified 2013

	Ghim Khoon	Kulim, Kedah	434	2012	Certified 2013
Kekayaan POM	Kekayaan	Paloh, Johor	4,436	2011	Certified
	Landak	Paloh, Johor	4,451	2011	Certified
	Voules	Tenang, Johor	2,977	2011	Certified
	Bandar Tenggara	Bandar Tenggara, Johor	950	2011	Certified
	New Pogoh	Tenang, Johor	1,560	2011	Certified
	Fraser	Kulai, Johor	2,932	2011	Certified
	Paloh	Paloh, Johor	2,029	2011	Certified
	Sungai Bekok	Bekok, Johor	636	2011	Certified
	Ban Heng	Pagoh, Muar, Johor	631	2011	Certified
	See Sun	Renggam, Johor	589	2011	Certified
Jerang Padam POM	Ayer Hitam	Bahau, Negri Sembilan	2,640	2013	Certified
	Batang Jelai	Rompin, Negri Sembilan	2,162	2013	Certified
	Jeram Padang	Bahau, Negri Sembilan	2,114	2013	Certified
	Kombok	Rantau, Negri Sembilan	1,915	2013	Certified
	Ulu Pemas	Pemas, Negri Sembilan	923	2013	Certified
	Gunung Pertanian	Simpang Durian, Negri Sembilan	686	2013	Certified
	Sungai Kawang	Lanchang, Pahang	1,889	2013	Certified
	Renjok	Telemong, Pahang	1,578	2013	Certified
	Tuan	Telemong, Pahang	1,353	2013	Certified
	Kemasul	Mengkarak, Pahang	459	2013	Certified
Tanjung Malim POM	Changkat Asa	Tanjung Malim, Perak	1,714	2013	Certified 2013
	Kerling	Kerling, Selangor	619	2013	Certified 2013
	Sungai Gapi	Serendah, Selangor	603	2013	Certified 2013
Tuan Mee POM	Tuan Mee	Sungai Buloh, Selangor	1,556	2012	Certified 2013
Kuala Pertang POM	Kerila	Tanah merah, Kelantan	2,191	2013	Certified 2014
	Pasir Gajah	Kuala Krai, Kelantan	2,107	2013	Certified 2014

	Sungai Sokor	Tanah Merah, Kelantan	1,603	2013	Certified 2014
	Kuala Gris	Kuala Krai, Kelantan	2,429	2020	Certified
Changkat Chermin POM	Lekir	Manjung, Perak	3,332	2012	Certified 2013
	Changkat Chermin	Manjung, Perak	2,540	2012	Certified 2013
	Raja Hitam	Manjung, Perak	1,497	2012	Certified 2013
	Allagar	Trong, Perak	805	2013	Certified 2013
	Glenealy	Parit, Perak	1,059	2013	Certified 2013
	Serapoh	Parit, Perak	936	2013	Certified 2013
	Kuala Kangsar	Padang Rengas, Perak	843	2013	Certified 2013
<b>SABAH, MALAYSIA</b>					
Pinang POM	Jatika	Tawau, Sabah	3,508	2009	Certified 2009
	Sigalong	Tawau, Sabah	2,864	2009	Certified 2009
	Pangeran	Tawau, Sabah	2,855	2009	Certified 2009
	Pinang	Tawau, Sabah	2,420	2009	Certified 2009
Mill 2	Pang Burong	Tawau, Sabah	2,548	2009	Certified 2009
	Sri Kunak	Tawau, Sabah	2,770	2009	Certified 2009
	Tundong Estate	Tawau, Sabah	2,155	2009	Certified 2009
	Ringlelet	Tawau, Sabah	1,834	2009	Certified 2009
Mill 1	-	Tawau, Sabah	-	2020	Certified
Pinang	Pinang	Tawau, Sabah	2,420	2009	Certified 2009
	Tundong	Tawau, Sabah	2,155	2009	Certified 2009
	Ringlelet	Tawau, Sabah	1,834	2009	Certified 2009
Lungmanis POM	Lungmanis	Lahad Datu, Sabah	1,656	2010	Certified 2010
	Sungai Silabukan	Lahad Datu, Sabah	2,654	2010	Certified 2010
	Rimmer	Lahad Datu, Sabah	2,730	2010	Certified 2010
	Tungku	Lahad Datu, Sabah	3,418	2010	Certified 2010
	Bukit Tabin	Lahad Datu, Sabah	2,916	2010	Certified 2010
Bornion POM	Bornion	Kinabatangan, Sabah	3,233	2010	Certified 2010
	Segar Usaha	Kinabatangan, Sabah	2,792	2010	Certified 2010

Desa Talisai POM	Desa Talisai South Estate	Sandakan, Sabah	1,640	2024	Uncertified
	Desa Talisai North Estate	Sandakan, Sabah	2,415	2024	Uncertified
	Sijas Estate	Sandakan, Sabah	1,011	2024	Uncertified
	Meliau Estate	Sandakan, Sabah	2,257	2024	Uncertified
Sabang POM 1	Sg Sabang Estate	Sugut, Sabah	4,650	2024	Uncertified
	Berakan Maju Estate	Sugut, Sabah	3,010	2024	Uncertified
	Excellent Challenger-1 Estate	Sugut, Sabah	3,506	2024	Uncertified
Sabang POM 2	Excellent Challenger-2 Estate	Sugut, Sabah	2,858	2024	Uncertified
	Rekanan Jaya North Estate	Sugut, Sabah	3,951	2024	Uncertified
Minat Teguh POM	Rekanan Jaya South Estate	Sugut, Sabah	968	2024	Uncertified
	Minat Teguh Estate	Sugut, Sabah	2,839	2024	Uncertified
LIBERIA					
Palm Bay Mill	Palm Bay Estate	Liberia	13,007	2023	Uncertified
	*KLK Time Bond Plan has been updated on November 2022 and develop by sustainability team. **Some changes year of TBP have been approved by RSPO on 15 November 2022.				
	Here's the remarks related to uncertified unit:				
	Country/ Region	Management Unit	RSPO Certification Timeline	Remarks	
	Indonesia	PT Bumi Makmur Sejahtera Jaya	Y2025	Hak Guna Usaha (HGU) is still pending	
		PT Menteng Jaya Sawit Perdana	Y2025	Hak Guna Usaha (HGU) is still pending	
		Tekukur Indah	Y2025	The unit is managed by KLK and has just been recently added into KLK's RSPO certification program. However, development has not started.	
	Malaysia	Mill 1	-	The unit is closed and its certificate will not be renewed during the next surveillance audit.	
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard				
	PT Pinang Witmas Sejati didn't have associated smallholders.				

<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>IC</b>	<p><b>1. Hasiholan Sihombing (Lead Auditor).</b> Indonesian citizen. Bachelor of Agriculture Majoring in Agronomy, Agriculture Faculty. He has working experience for 7 (seven) years since 2009 as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The training he has followed namely: Lead Auditor ISPO in 2016, RSPO P&amp;C Lead Auditor Course in 2018, RSPO Supply Chain Certification Lead Auditor Course in 2020, SA 8000 Awareness in 2018, Quality Management Systems (ISO 9001:2015) in 2016, Environmental Management Systems (ISO 14001:2015) in 2017, OHS General Expert in 2013, OHSAS 18001:2007 in 2017, ISO 19011:2018 in 2019, ISO 17021:2011 and ISO 17065:2012 in 2016. During this audit, he was assigned to verify legal aspects, land dispute, SCCS, Environment, GHG, and HCV aspects.</p> <p><b>2. Rasytio Puspanjana (Auditor).</b> Indonesian Citizen. Bachelor of agriculture, majoring in Soil Science. Agriculture Faculty. He was working as honorarium Officer at the Riau Province Plantation Agency in the division of huge estate for 1 year. The participated trainings are Survey and Mapping (GIS) Training which was held by National GMTI, ISPO auditor training, ISO 9001/2008 auditor training, ISO 14001/2004 auditor training, IHT Geospatial Information System, IHT High Conservation Value, IHT Environmental Impact Assessment, IHT Green House Gas and RSPO Lead Auditor Course by Checkmark Training in 2018. Since 2015 has been following many audits as auditor base on Best Management Practice and Environment. During this audit, he was assigned to verify long term management plan, OHS and Best Management Practice aspects.</p> <p><b>3. Septian Maulana (Auditor).</b> Indonesian Citizen, Bachelor of Economic, Pamulang University. Have experience as sustainability staff on oil palm plantation. Training have been followed including Occupational Health and Safety Expert Candidate certification by Ministry of Manpower and Transmigration of Indonesia; Basic Fire Fighting and Basic First Aid; Awareness Integrated Management Systems (ISO 14001, and ISO 45001 in 2020); Awareness (ISO 19011, ISO 17065; and ISO 17021) in 2020; ISO 9001:2015 Lead Auditor in 2021, ISPO Lead Auditor in 2021, RSPO Lead Auditor in 2021 and Completed Awareness Social Audit SMETA in 2022. During this audit, he was assigned to verify Worker Welfare and Transparency aspects.</p> <p><b>4. Helma Namira (Auditor Trainee).</b> Indonesian citizen, Bachelor of Science, majoring in Biology, University of Indonesia. Has 2 years experiences working in Health Safety Security Environment (HSSE) Refinery in one of Oil &amp; Gas Company in Indonesia. Attended trainings are Awareness ISO 19011: 2018; Awareness ISO 9001:2015, Awareness ISO 17021:2015, IHT Awareness ISO 17065:2012, IHT Awareness ISO 14001:2015, IHT Awareness IHT ISO 45001:2018, IHT Awareness ISPO P&amp;C Certification System, IHT Awareness RSPO, Training ISPO Regulation of the Minister of Agriculture 38 in 2020. During this audit, she was assigned to verify Environment, GHG, and HCV aspects under supervised by Lead Auditor.</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>IC</b>	<p>Number of auditors: 3 Auditors and 1 Trainee</p> <p>Number of days for <b>IC</b> at site: 6 days</p> <p>Number of working days for <b>IC</b> at site: 18 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>IC</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Pinang Witmas Sejati – PWS 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>

The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required document The assessment was conducted by measuring the implementation of certification system and standard conducted by PT Pinang Witmas Sejati, PWS POM based on:

- 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
- RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020

The scope of certification of PT Pinang Witmas Sejati consist of one mill (PWS POM) and three estates (Pasar Salak Estate, Pangkor Estate and Grik Estate).

The audit program is included as Appendix II. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to directly observe the sufficiency of implementation on site. Some opportunities for improvement of the results IC by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of IC.

The auditor's journey from the airport in Jambi to the audit location in Musi Banyuasin District, Sumatera Selatan takes about 3-4 hours. The opening meeting was held on 5 December 2022 in PT PWS meeting room. As for the participants who attended the online opening meeting included the General Manager, Senior Manager, Estate and Mill Managers, Sustainability staff, Support Team from Jakarta, Pekanbaru and other staff. Closing meeting was held on 10 December 2022 attended by the same participants as the opening meeting. Management PT PWS accepted all this audit results.

During the COVID-19 pandemic, there were several modifications to the audit activity due to health protocols. Audit process carried out with high safety protocol procedure that developed by Certification Body and the unit of certification. Before an onsite audit carried out, there are several meetings to discuss health protocol procedures. There are several activities that are not possible to do face to face, such as public consultations with government agencies so that these activities are carried out by telephone.

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

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

All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU).

The assessment program please find Appendix 2.

<b>2.2.3</b>	<b>Locations of Assessment</b>
<b>IC</b>	<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>Pinang Witmas POM</b></p> <ul style="list-style-type: none"> <li>• <b>Workshop.</b> Observation and interview related to OHS implementation, worker welfare, training, and machine maintenance.</li> <li>• <b>Hazardous Waste Temporary Storage.</b> Field observations and interview related to the fulfilment of the attribute's health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse.</li> <li>• <b>Oil Storage.</b> Observation and interview related to hazardous material storage and environmental aspects.</li> <li>• <b>Centre Warehouse.</b> Observation and interview related to hazardous material storage and environmental aspects.</li> <li>• <b>Chemical Storage.</b> Observation and interview related to hazardous material storage and environmental aspects</li> <li>• <b>Hydrant Simulation.</b> Observation of preparedness of fire emergency response teams and preparedness of emergency response devices.</li> <li>• <b>WTP.</b> Observation and interview related to OHS implementation, worker welfare, water management and monitoring of water use.</li> <li>• <b>Security Post.</b> Observation and interview with security related to SCSS procedure and worker welfare aspect.</li> <li>• <b>Weighbridge Room.</b> Observation and interview with operators related to SCSS procedure, OHS and worker welfare aspect.</li> <li>• <b>Loading Ramp.</b> Observation and interview with security related to grading procedure, OHS and worker welfare aspect.</li> <li>• <b>St. Sterilizer.</b> Observation related OHS and worker welfare.</li> <li>• <b>St. Press.</b> Observation and interview with worker related OHS and worker welfare.</li> <li>• <b>St. Engine room.</b> Observation and interview with worker related OHS and worker welfare.</li> <li>• <b>St. Boiler.</b> Observation and interview with worker related OHS and worker welfare.</li> <li>• <b>Solid Waste.</b> Observation of the management of Solid waste consist of EFB, fibre and shell from the production process of mill.</li> <li>• <b>WWTP.</b> Field observations related to Ban to entry to WWTP, run off, testing of effluent.</li> <li>• <b>Mill drainage.</b> Field observation and interview related mill drainage and potency of environmental contamination.</li> <li>• <b>Clinic support.</b> Observation and interview towards health facilities provided by company, infectious or medical waste management, housing health condition and manpower aspect.</li> <li>• <b>Land application, Block F8.</b> Observation for wastewater management and nutrient cycle strategy</li> <li>• <b>Housing Complex.</b> Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.</li> </ul> <p><b>Pasir Salak Estate</b></p> <ul style="list-style-type: none"> <li>• <b>Harvesting, Block D20 Division 2.</b> Field observations and interviews related to technical work, OHS, worker welfare, social and environment aspects.</li> <li>• <b>Pesticide Applicator, Block D20 Division 2.</b> Field observations and interviews related to technical work, OHS, worker welfare, social and environment aspects.</li> <li>• <b>Conservation Area (Cemetery Area) Block D5 Division 2.</b> Observation management of conservation area.</li> <li>• <b>HGU Pole No. 142 Block C20 Division 2.</b> Observation of the condition of the boundary markers and the position of the company's legal boundaries.</li> </ul>

	<ul style="list-style-type: none"> <li>• <b>HGU Pole No. 165 Block A13 Division 1.</b> Observation of the condition of the boundary markers and the position of the company's legal boundaries.</li> <li>• <b>HGU Pole No. 01 Block A1 Division 1.</b> Observation of the condition of the boundary markers and the position of the company's legal boundaries.</li> <li>• <b>Nursery Area, Block B19 Division 1.</b> Field observations and interviews related to seed management, work techniques, labour and environmental aspects.</li> <li>• <b>Fire Fighting Equipment Storage.</b> Simulation the function of fire extinguishers and team readiness.</li> <li>• <b>Diesel Tank.</b> Observation of OHS, environment aspect, emergency response and fire facilities.</li> <li>• <b>Fertilizer warehouse.</b> Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.</li> <li>• <b>Oil and Agrochemicals Warehouse.</b> Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.</li> <li>• <b>Hazardous Waste Warehouse (Temporary).</b> Field observations related to the fulfilment of the attribute's health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse, wages, and complaint mechanism.</li> <li>• <b>Generator (Electricity).</b> Observation for waste management, and interviews related to workers facility, electricity, domestic waste, sources of fresh water, socialization of company policy and complaint mechanism.</li> <li>• <b>Spare part and PPE warehouse.</b> Observation minimum stock of PPE's.</li> <li>• <b>Workshop.</b> Observations and interviews related to wages and overtime, waste management activities, OHS implementations and health inspections.</li> <li>• <b>Housing Complex KM 12.</b> Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.</li> <li>• <b>Clinic.</b> Observation and interview towards health facilities provided by company, infectious or medical waste management, housing health condition and manpower aspect.</li> <li>• <b>Domestic Waste Landfill, Block D20 division II.</b> Observation on domestic waste management.</li> <li>• <b>Fire Fighting tower Block D20 divisi II.</b> Observation of the Fire Fighting monitoring equipment.</li> </ul> <p><b>Pangkor Estate</b></p> <ul style="list-style-type: none"> <li>• <b>HGU Pole No. 49 Block J14 Division 2.</b> Observation of the condition of the boundary markers and the position of the company's legal boundaries.</li> <li>• <b>HGU Pole No. 127 and 128 Block G6 Division 1.</b> Observation of the condition of the boundary markers and the position of the company's legal boundaries.</li> <li>• <b>Housing of OP 99.</b> Observation and interview for domestic waste management, OHS, worker facilities, and complaint mechanism.</li> <li>• <b>Fertilizer Storage.</b> Observation and interview related to OHS, worker welfare and waste management</li> <li>• <b>Rinse house.</b> Observation and interview related to OHS, worker welfare and waste management</li> <li>• <b>Mixing chemical material storage.</b> Observation related OHS, and agrochemical waste management.</li> <li>• <b>Housing of OP 99.</b> Observation and interview for domestic waste management, OHS, worker facilities, and complaint mechanism.</li> <li>• <b>Landfill Block K4.</b> Observation related domestic waste management</li> <li>• <b>Housing of OP 99.</b> Observation and interview for domestic waste management, OHS, worker facilities, and complaint mechanism.</li> <li>• <b>Fertilizer Warehouse OP 2007.</b> Observation of material handling technical activities, implementation of OHS and handling of hazardous materials, labour aspects, and environmental aspects related to the management of fertilizer packaging waste.</li> <li>• <b>Circle path Spraying, Block K2, Division 2.</b> Observations and interviews related to work systems, pesticide filling, OSH and employment aspects.</li> <li>• <b>Harvesting and loose fruit picker block K78 and W23 division 1.</b> Observation related FFB quality, harvesting round, OHS, and employment.</li> <li>• <b>Utilization of beneficial plants <i>turnera subulata</i> block W8 division 1.</b> Field observations regarding</li> </ul>
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	<p>the control of biological agents for caterpillar pests.</p> <ul style="list-style-type: none"> <li>• <b>Peat subsidence and piezometer block W8.</b> Field observations regarding peat management instruments.</li> <li>• <b>Replanting activities Block G12 and G23.</b> Field observations regarding Good Agriculture Practices for replanting</li> </ul> <p><b>Grik Estate</b></p> <ul style="list-style-type: none"> <li>• <b>HGU Pole No. 108 Block R4 Division 2.</b> Observation of the condition of the boundary markers and the position of the company's legal boundaries.</li> <li>• <b>HGU Pole No. 104 Block R16a Division 2.</b> Observation of the condition of the boundary markers and the position of the company's legal boundaries.</li> <li>• <b>HGU Pole No. 84b and 85a Block N17 Division 2.</b> Observation of the condition of the boundary markers and the position of the company's legal boundaries.</li> <li>• <b>Conservation Area (Meranti River Border) Block D5 Division 2.</b> Observation management of conservation area.</li> <li>• <b>Agrochemicals Warehouse.</b> Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.</li> <li>• <b>Fertilizer warehouse.</b> Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.</li> <li>• <b>Workshop.</b> Observations and interviews related to OSH and worker welfare.</li> <li>• <b>Rinse House.</b> Observations regarding the management of agrochemical materials and waste, MSDS, emergency response facilities and the types of pesticides used.</li> <li>• <b>Housing Blok M11.</b> Observations regarding aspects of the feasibility of housing infrastructure, environmental aspects related to sanitation and domestic waste management, aspects of employment, and implementation of emergency response in housing.</li> <li>• <b>Harvesting, Block S23.</b> Observation and interview related to work procedure, OHS, and worker welfare.</li> <li>• <b>Loose Fruit Collecting Activity, Block S23.</b> Observation and interview related to work procedure, OSH, and worker welfare.</li> <li>• <b>Barn Owl Nest, Block S23.</b> Observation related IPM procedure and monitoring.</li> <li>• <b>Beneficial plant, <i>Turnera subulata</i>, Block S23.</b> Observation related IPM procedure and monitoring, OHS, Work Procedure for IPM and Spraying because the sources work as maintenance worker, Worker Welfare, and Environment aspect.</li> <li>• <b>EFB Application, Block T22-T21.</b> Observation related EFB Application as utilization of solid waste procedure and implementation.</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>IC</b>	<p>Consultation of stakeholders for PT Pinang Witmas Sejati was held by:</p> <ul style="list-style-type: none"> <li>• Public Announcement on Mutu International and RSPO Website before assessment on 26 October 2022.</li> <li>• Public consultation with NGOs (by email) such as WALHI, WWF, AMAN, Greenpeace and Sawit Watch on 23 November 2022.</li> <li>• Public consultation by phone with government institution in Musi Banyuasin District on 6 December 2022.</li> <li>• Public consultation by phone with local communities (Muara Merang Village, and Mangsang) on 6 December 2022.</li> <li>• Public consultation by phone with internal stakeholders and local contractor on 6 December 2022.</li> </ul> <p>Numbers of input from stakeholders were clarified by PT Pinang Witmas Sejati.</p>

<b>2.3.2</b>	<b>Stakeholder contacted</b>
	Please find appendix 1
<b>2.4</b>	<b>Determining Next Assessment</b>
<b>IC</b>	The next visit <b>ASA-1</b> will be conducted eight (8) months to twelve (12) after date of certificate

### 3.0 ASSESSMENT FINDINGS

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

MUTUAGUNG LESTARI has conducted an assessment of Pinang Witmas Sejati POM, PT Pinang Witmas Sejati subsidiary of KLK Bhd operation consisting of one (1) mill and three (3) estates.

During the assessment, there were one (1) non-conformity were assigned against Major Compliance Indicators; and there were two (2) non-conformities were assigned against Minor Compliance Indicators were identified and 3 (three) opportunities for improvement were identified.

Further explanation of the non-conformities raised, and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidence e.g. (document record/photographic/etc). Those corrective actions taken that consist of one (1) Major non-conformities and two (2) Minor non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Pinang Witmas Sejati POM, PT Pinang Witmas Sejati subsidiary of KLK Bhd complied with the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification System for Principles and Criteria and RSPO Independent Smallholder Standards, Endorsed by the RSPO Board of Governors on 12 November 2020.

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>	
<b>1.1</b>	<b>The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</b>
<b>1.1.1</b>	<p>The company maintains a list of publicly available/publishable documents. The types of information provided to the public are contained in the Master Document List, including: Certificates/Permits/Regulations; monitoring checklist; Information Request Logbook; Logbook of Complaints and Requests for Assistance; Socialization Logbook; Group Training Records; Individual Training Records; ISPO Internal Audit; ISPO External Audit; HGU; AMDAL/UKL-UPL; AMDAL/UKL-UPL Periodic Reports; HCV Report; HCV Plan; SIA Reports and Plans; OHS committee Minutes; Medical Examination Records; List of Chemicals; Material Safety Data Sheet (MSDS); Records of PPE Expenditure; RSPO/ISPO SOPs; Accident Report; OHS Committee Report to Related Agencies; OHS Risk Analysis; Hazardous Waste balance; Hazardous Materials Inventory; Laboratory Report; Compensation Records; Fire Fighting Infrastructure &amp; Facilities; KLK Good Agricultural Practices (KLK GAP); OHS Management System Plan; HGU Map; Continuous Improvement Program; KLK's Sustainability Policy.</p> <p>These documents have an active shelf life of 5 years and some documents are subject to revision/change. In addition, documents that can be accessed by the public are also available on the company's website (<a href="https://www.klk.com.my/">https://www.klk.com.my/</a>)</p>
<b>1.1.2</b>	The certification unit has SOPs for communicating with both internal and external parties. This procedure is contained

in SSOP 1. Request and Provision of Information, Communication and Submission of Complaints dated 24 April 2020 3rd Revision. The SOP explains the mechanism for Requesting and Providing Information in writing (by letter, e-mail) and verbally (by telephone, visits, and direct interviews), Communication (to internal and external stakeholders), Submission of complaints. All requests for information from external and internal parties, and all incoming and outgoing letters have been recorded in the PT PWS Information Logbook. All forms of information are presented in an appropriate language and can be accessed by stakeholders (related stakeholders).

The company shows documents providing information to stakeholders in accordance with applicable regulations, for example:

- Plantation progress report (LPUP) of PT Pinang Witmas Sejati period of Semester I 2022 has been sent to Plantation Agency of Musi Banyuasin District on 13 July 2022.
- HGU utilization report of PT Pinang Witmas Sejati for the period of 2022 has been sent to Land Agency of Musi Banyuasin District on 23 November 2022.
- Compulsory Report on Employment in the Company (PWS Estate) Registration No. 016 dated 1 April 2022 with the obligation to report back on 1 April 2023.
- Compulsory Report on Employment in the Company (PWS Mill) Registration No. 093 dated 1 April 2022 with the obligation to report back on 1 April 2023.
- Proof of Temporary Workers registration dated 17 June 2022 to the Manpower and Transmigration Office of Musi Banyuasin District
- Proof of receipt of the list of PT PWS Temporary Workers as of October 2022 to the Manpower and Transmigration Office of Musi Banyuasin District
- Report on efforts to prevent, control and control fire hazards to the Plantation and Plantation agency of the Musi Banyuasin District on 1 July 2022.
- Quarter IV OHS committee report for the 2022 period to the Manpower and Transmigration Office of the Musi Banyuasin District on October 1, 2022.
- Receipt of reporting of RKL/RPL documents for semester II of 2021 for the period July – December 2021 to the Musi Banyuasin District Environmental Agency on March 23, 2022.
- Receipt of reporting of RKL/RPL documents for semester I of 2022 for the period January – June 2022 to the Musi Banyuasin District Environmental Agency on August 18, 2022.
- Receipt of Reporting of Hazardous Waste Management Documents for Quarter I of 2022 for the period January – March 2022 to the Musi Banyuasin District Environmental Office on April 11, 2022.
- Receipt for reporting of Hazardous Waste Management documents for the second quarter of 2022 for the April - June 2022 period to the Musi Banyuasin District Environmental Office on July 14, 2022.
- Receipt of the report for the 3rd Quarter 2022 Hazardous Waste Management document for the July - September 2022 period to the Musi Banyuasin District Environmental Office on October 1, 2022.
- Receipt of the report on the Report on the Implementation of Management and Monitoring of High Conservation Value Areas of PT Pinang Witmas Sejati Year 2022 which was reported to the Environment Agency and the Centre for Natural Resources Conservation, Musi Banyuasin District on August 25, 2022.

#### **1.1.3; 1.1.4**

The company has procedures for requesting and providing information to stakeholders in the Sustainability Standard Operating Procedures (SSOP) document No. 1 Revision 4 which was ratified by the R&D Director on 25 October 2021. The document explains the person in charge of receiving information, namely the manager/assistant/public relations /sustainability team and the maximum time limit for providing responses to providing information, which is 14 days.

Documentation of requests for information and responses has been recorded in the Stakeholder Logbook document which contains information on requests, consultations, and communications as well as complaints and grievances directed at the company. For example, the request for sports funding from the Karang Taruna of Muara Merang Village on 20 June 2022 was responded to by the company on 20 June 2022 and realized on 10 July 2022.

Based on interviews with representatives of Mangsang Village and Muara Merang Village, it is known that stakeholders already have knowledge about the mechanisms for submitting and requesting information, and also stakeholders

already have knowledge about the personnel who are responsible for communicating with the company.

**1.1.5**

The company shows a list of stakeholders for 2022 which was updated on November 12, 2022, the document informs the name of the agency, name of the PIC/stakeholder, address, and telephone number. The list of stakeholders consists of the names of contractors, suppliers, agencies, surrounding villages, non-governmental organizations/NGOs, and others. For example, in the document, one of them informs 2 villages (Muara Merang and Mangsang Villages) and 33 suppliers or contractors. In addition, the contact number contained in the document can be contacted by the auditor team during the audit activity.

**Status: Comply**

**1.2**

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

**1.2.1**

The company shows the Declaration of Compliance with KLK Group Policies and Anti-Corruption. In the document it is stated that all workers must comply with the terms and conditions and procedures listed in the policy below:

- KLK Group Anti-Corruption Policy
- Company Code of Ethics and Conduct
- Employee Code of Ethics
- Supplier Code of Conduct (Supplier)
- Violation Reporting Policy
- Employee Complaint Handling Policy
- Guidelines on Gift Giving, Benefits and Hospitality
- Policy on Donations and Sponsorships

Furthermore, UoC also showed KLK anti-corruption policy validated on 3 August 2020. This policy generally stated that the group prohibits their workers from any bribery, illegal, and unethical business practice.

Policies related to the code of conduct for business conduct, prevention and eradication of money laundering, eradication and prevention of criminal acts of corruption have been socialized in each plantation unit and factory. The results of interviews with contractor representatives of PT Pelangi Muda Sejahtera, it is known that the contractor has an understanding regarding the code of ethics such as honest work and no bribery or corruption practices.

**1.2.2**

UoC has a system to monitor compliance and implementation of policies and overall ethical business practices on several SOPs, here as follows:

- SOP of workers management (No. SSOP 29) concerning on recruitment system validated on 10 April 2019 which stated that in recruitment the minimum age to apply is 18 years old and there was no cost in recruitment process.
- SOP of handling information request and grievances (No. SSOP 01 Rev-04) validated on 25 October 2021 which stated about the definition of the complaint, the type of complaint, the channel for submitting the complaint, the protection of employees against retaliation, training, annual review and evaluation.

UoC already has a contractor evaluation mechanism aimed to monitor the compliance and the implementation of policies and ethical business practices. UoC also conducted the internal audit in terms of monitoring the compliance and the implementation of policies and ethical business practices in plantation and factory activities one of which is through ISPO and RSPO internal audits for example, the internal audit activity was carried out on 22 - 26 August 2022. In addition, as one of the monitoring of the business code of ethics in the financial aspect, the company has conducted a financial audit conducted by a public accountant, for example, the financial audit report for the 2021 financial year Number AP.0524 dated 17 November 2021 with a fair opinion on the financial statements.

**Status: Comply**

**PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS**

**2.1**
**There is compliance with all applicable local, national and ratified international laws and regulations.**
**2.1.1.**

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

**Land legality**

In term of legal and permit regulation compliance, company are able to shown several documents, such as Location Permit and Land Tenure or Land Use Right (HGU). Besides that, unit of certification also has business permit consist of:

- Permanent Business Permit based on the Decree of the Head of Cooperatives, Small, Medium Entrepreneurs and Investment Office of Sumatera Selatan Province Number: 20/16/IUT/PMA/DkopKm&Pm/VIII/2004 dated 23 August 2004. The permit is for Integrated Oil Palm Plantations with Processing Units into Palm Oil and Palm Kernel with a production capacity of 270,000 tons of FFB; Palm Oil 54,000 tons and Palm Kernel 12,150 tons.
- Plantation Business Permit based on the Decree of the Musi Banyuasin Regent Number 295/KPTS/IUP-B/DISBUN/2015 concerning Plantation Business Permit (IUP) to PT Pinang Witmas Sejati issued on August 13, 2015. The plantation business permit is for a scope of 14,980.49 Ha.
- Plantation Business License with license number 81202120026910005 issued by the Minister of Investment/Head of the Investment Coordinating Board on 3 May 2022 electronically. From the results of technical verification document No. 553/P1.400/E.6/04/2022 issued by the Directorate General of Plantations on April 28, 2022, it is known that approval was given to the Plantation Business Permit (IUP) application with an area of 14,980.49 Ha and a processing unit capacity of 90 Tons of FFB/hour.

PT Pinang Witmas Sejati has obtained a Permanent Business License in 2004 based on the Decree of the Head of the Cooperatives, Small, Medium Entrepreneurs and Investment Office of Sumatera Selatan Province Number: 20/16/IUT/PMA/DkopKm&Pm/VIII/2004 dated August 23, 2004. The permit for Integrated Oil Palm Plantations with Processing Units into Palm Oil and Palm Kernel with a FFB production capacity of 270,000 tons; Palm Oil 54,000 tons and Palm Kernel 12,150 tons. Based on this permit, the company is not obligated to develop partnership plantation (plasma).

Then the company obtained a Plantation Business Permit in 2015 based on the Decree of the Musi Banyuasin Regent Number 295/KPTS/IUP-B/DISBUN/2015 Concerning Plantation Business Permits (IUP) to PT Pinang Witmas Sejati issued on August 13, 2015 where the IUP is for the scope covering an area of 14,980.49 Ha. Because there is no information regarding the capacity of the processing unit in the business license, the company again applied for a plantation business license and obtained a Plantation Business License with license number 81202120026910005 which was issued by the Minister of Investment/Head of the Investment Coordinating Board on May 3, 2022 electronically. From the results of technical verification document No. 553/P1.400/E.6/04/2022 issued by the Directorate General of Plantations on April 28, 2022, it is known that approval was given to the IUP application with an area of 14,980.49 Ha and a processing unit capacity of 90 Tons of FFB/hour. In this permit, there is a point in the obligation column stating that the facilitation of the development of the surrounding community plantations is carried out within a period of no later than 3 years since the right to cultivate is granted. In this regard, the company has made efforts to facilitate the development of community plantations, including the following:

- Mapping the locations of potential partners from ring 1, ring 2 and ring 3 villages of PT PWS.
- Has collected data on prospective partnership land in Mekarsari Hamlet, Mangsang Village, covering an area of 152.60 Ha.
- Have collected data on the candidate land partnership for Tanah Tinggi Hamlet covering an area of 442.66 Ha.
- There is a proposed land area of approximately 5,000 Ha, but this area is included in the Production Forest area. The company stated that it was waiting for the proposed land to be converted first into *APL* so that it could be processed for clearing into plasma land.
- The company has also sent an official letter on April 25 2022 to ring 1 village heads of PT PWS such as Mangsang Village, Muara Merang Village and Kepayang Village as well as ring 2 and ring 3 village heads such as Beji Mulyo

Village, Bero Jaya Timur Village, Margo Mulyo Village and Pandan Sari Village regarding the offer of a joint partnership program with PT PWS in the form of community oil palm plantation management to increase production and productivity such as procurement of fertilizers, harvesting equipment, spray equipment, technical guidance on oil palm cultivation, maintenance and repair of infrastructure, processing of community FFB, planting community oil palm plantations including replanting and others.

Based on interviews with PT PWS's public relations department, it was conveyed that the company was very open to establishing this partnership, but because PT PWS' land does not exist anymore other than land that has had HGU since 1999 and will expire in 2034, the company is waiting for the community's proposal to the lands that will be used as partnerships and so far the company has pocketed data on some of the land candidates.

#### **Worker Welfare Aspects**

- Worker had a minimum wage
- Workers has had insurance
- Medical surveillance has been conducted routinely

#### **Best Management Practice aspect**

In best management practices, it is known that plantation and mill management have implemented several laws and regulations in Indonesia, for example, using mechanical or non-burning methods during land clearing and replanting, the oil palm planted comes from seed producers (DxP) recognized by the government Indonesia, such as Lonsum, Socfin Indonesia and PT. Applied Agricultural Resources Indonesia. Furthermore, the plantations (every management unit) have implemented integrated pest control, biological control and only use pesticides registered on the government website Pesticide.id.

#### **The OHS regulatory compliance**

Based on the verification document the results of the review of the Operator's List of Names, it is known that the certification unit already has workers who have received training in accordance with the type of work regulated in government regulations, which are summarized as follows:

- The certification unit has 2 turbine operators.
- The certification unit has 2 diesel motor operators.
- Work accident data reports to the Department of Manpower, Cooperatives, Small and Medium Enterprises dated 1 October 2022.
- The certification unit has 2 boiler operators. The company already has 2 class 1 boiler operators and 6 class 2 operator candidates who have been registered to attend training at PT. Arpindo Multi Utama.
- The certification unit has a Backhoe Loader operator
- The certification unit has 2 electric technician who already have a license.
- The certification unit has a grader operator who already have a license.
- The certification unit has a Tractor Backhoe Loader operator who already has a license.
- The certification unit has a tractor operator.
- The certification unit has compactor tractor operator who already have a license.
- The certification unit has OHS expert 1 who already have a license,
- The certification unit has first aid officer who already have a license is 5 officers.
- The certification unit has *Hyperkes* who already have a license is 9 officers,
- The certification unit has hoisting crane operator who already have a license is 4 officers.

#### **Compliance with Environmental Regulations:**

- The company has demonstrated compliance with regulations related to environmental management such as having an Environmental Permit, Environmental Documents in the form of the 2016 ANDAL Addendum for a study area of 14,980.49 Ha with a capacity change of 60 tonnes of FFB/hour to 90 tonnes of FFB/hour, Land Application Permit, Permit of Hazardous waste warehouse.
- The company also conducts regular reporting related to environmental management, such as RKL-RPL Report Every Semester and Quarterly Hazardous Waste Management Report

**2.1.2.**

The company has SOP No 2 regarding compliance with applicable laws and regulations No revision 4 dated 8 Aug 2016. The SOP explains that the person in charge of managing legal rules is the Manager/KTU. Meanwhile, the person in charge if there are changes and updates to laws and regulations is the Legal Coordinator/Public Relations. Changes to applicable laws and regulations will be informed by the Jakarta Head Office and Pekanbaru. The company shows a list of the latest updated laws and regulations (year 2022) relevant to PT PWS. Then, the system to ensure legal compliance by contractors is to monitor compliance with several related regulations in the Contractor List & Contractor File Monitoring document. Company showed the example of legal compliance by contractor, for example the receipt of BPJS for contractor worker and wage documentation of contractor workers.

**2.1.3**

Procedure of legal boundary stakes monitoring and maintenance is presented in SOP No. SSOP4, revision 3 dated 24 August 2019. Procedure mentioned that maintenance was carried out by officers who have been appointed by the Estate Manager. Monitoring the boundaries of the HGU at least once a year.

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

Field observations to several HGU boundary markers in Pasir Salak Estate (Stakes No. 01, 142 and 165); Pangkor Estate (Stakes No. 49, 111, 127 and 128) and Grik Estate (Stakes No. 104, 108, 84b and 85a), show that the stakes sampled during the audit were available in the field and in well-maintained conditions. Verification using GPS indicates that the pole coordinate is in accordance with the provisions of the land title. Land boundaries with outsiders are clear, such as a large boundary road and trench that borders the HGU area. There is no indication of land use outside the HGU.

<b>Status: Comply</b>
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**2.2**

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

**2.2.1**

The company shows a list of contractors and suppliers that work with the company, for example:

No.	Name	Activity	Contract
1	Koperasi Jaya Mitra Bersama	Kernel Transporter	100/PWS/SPK/X/2022
2	PT. Pelangi Muda Sejahtera	FFB, EFB and Kernel Transporter	073/PWS/SPB/X/2022
3	CV. Koperasi Sungai Melayu Sejahtera	FFB Transporter	074/PWS/SPB/X/2022
4	PT Restu Bunda Berjaya	FFB Transporter	072/PWS/SPB/X/2022
5	Koperasi Makmur Sakti	FFB Supplier	007/TBS/KMS-PWS/X/2022
6	PT Bintang Pandawa Sakti	FFB Transporter	101/PWS/SPK/XI/2022
7	PT Sumatera Kalimantan Jaya	Replanting	089/PWS/SPB/X/2022
8	PT Anugrah Bintang Abadi	Upkeep	PWS-POM/SPPB/025/2022
9	PT Alfarabby Barokah Mandiri	CPO Transporter	075/PWS/SPK/X/2022
10	PT Mulia Borneo Mandiri	CPO carrier	253/FN/MBM/X/2022

**2.2.2; 2.2.3**

The company shows the SPK with the contractor, for example the Letter of Agreement for the Transport of Fresh Fruit Bunches Number: 073/PWS/SPB/X/2022 dated 1 October 2022 between PT PWS and PT Pelangi Muda Sejahtera. The document contains related clauses regarding the fulfilment of relevant legal obligations including:

- Responsible for work safety, transport feasibility and permits set by the authorities
- Registering workers into the Health and Employment BPJS
- Fully responsible for all tax obligations that arise
- Equip drivers with PPE
- Implement a minimum wage
- Do not employ children under 18 years of age
- Comply and comply with all laws and regulations in force in the Republic of Indonesia

The company shows records of compliance with regulations by third parties, for example PT PMS contractors which include signing a code of ethics, Contract between PT PWS and PT PMS, Contract between PT PMS and workers, as well as proof of payment of wages to PT PMS workers.

**Status: Comply**

### 2.3

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

#### 2.3.1

The Certification Unit can show a list of suppliers that send FFB to Pinang Witmas Sejati POM. The following is FFB supplier data from outside the scope of certification for the 2022 period, including:

No	Supplier Name	Supplier Address	RSPO Status	Coordinate	Land Status	Hectarage (Ha)
1	Koperasi Makmur Sakti (KMS)	Tanah Tinggi Village, Bayung Lencir Sub District, Sumatera Selatan Province, Indonesia	Non-Certified	S 2.19659° E 104.0981°	Owned	537
2	Koperasi Jaya Mitra Bersama (KJMB)	Mangang Village, Bayung Lencir Sub District, Musi Banyuasin District, Sumatera Selatan Province, Indonesia	Non-Certified	S 2.17582° E 104.1615°	Owned	1,045.65
3	Trans B1	Beji Mulyo Village, Tungkal Jaya Sub District, Musi Banyuasin District, Sumatera Selatan Province, Indonesia	Non-Certified	S 2.25842° E 103.8963°	Owned	468

Based on the data above, it is known that the FFB supplier to Pinang Witmas Sejati POM comes from a 3rd party outside FFB supplier. The management unit can show the Traceability Declaration Document for FFB Supplying Plantations to PWS POM. The types of data contained in the document include Smallholder ID, legal rights, village location, sub-district, regency/province, geolocation, ISPO & RSPO certification status, and area size.

#### 2.3.2

Based on the results of document verification and results of field visits to the PWS Mill, it is known that there are no suppliers from outsiders/outgrowers of FFB obtained indirectly. Based on the results of interviews with management representatives, it was informed that the company does not receive FFB from agents or collectors. The company only wants to accept fruit from private plantations owned by Independent Supplier which are registered as PT PWS FFB suppliers. And it can be proven by the work agreement documents that shown all the third party FFB supplier was not

a middleman that collecting FFB from other parties. For example work agreement between Koperasi Jaya Mitra Bersama and Pinang Witmas Sejati Number 076/TBS/KJMB-PWS/X/2022 dated October 1<sup>st</sup>, 2022 valid until December 31<sup>st</sup> 2022.

**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 company shows the company's long-term plans contained in the Economic Indicator document of PT PWS (5 years) for example for the period 2022/2023 – 2026/2027 on January 2022, briefly as follows:

<b>Indicator</b>	<b>2022/2023</b>	<b>2023/2024</b>	<b>2024/2025</b>	<b>2025/2026</b>	<b>2026/2027</b>
Mature (Ha)	13,924.30	13,347.70	12,849.70	13,136.50	13,613.10
FFB Own Estate (Ton)	300,111	268,042	255,540	260,008	248,351
FFB Outsiders	5,000	5,000	5,000	5,000	5,000
OER	20.50	20.50	20.50	20.50	20.50
KER	5.75	5.75	5.75	5.75	5.75
Kernel Production (Ton)	17,544	15,700	14,981	15,238	14,568
CPO Production (Ton)	62,548	55,974	53,411	54,327	51,937

In addition, the document also informs the projected production costs and revenue projections assuming the CPO price and PK price. Thus, it can be concluded that the company has a documented time management plan.

PT Pinang Witmas Sejati does not yet have a plasma or smallholder scheme for local communities, the company will prepare a plan for plasma development after the case related to plasma land is completed as explained in indicator 4.2.3

##### **3.1.2**

###### Replanting Plan

The company shows the Long-Term Replanting Program document for PT PWS which informs the 2020-2026 replanting plan, for example the replanting program for the PWS POM scope for the next 5 years with the following details:

<b>Estate</b>	<b>Hectare</b>				
	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
Pasir Salak	30	339	323	-	-
Pangkor	258	-	-	-	-
Grik	-	-	-	-	-

###### Replanting Review

The company shows the document of Minutes of Work Inspection dated 27 August, 2022 for the 2022 Oil Palm Replanting work at Pasir Salak Estate and Pangkor Estate. Based on the study of the document, it is known that in replanting activities through work including: covering and leveling the soil, making collection roads, making harvest roads, making felt, cleaning ditches, racking chipping and pulverizing trees. For replanting in the peat area of the Pangkor estate, it was not carried out because it was still being assessed for drainability, for 258 ha on Planting year 2022 no on peat area

Thus, it can be concluded that the company has had a replanting program at least once every 5 years which is reviewed regularly.

##### **3.1.3**

The company shows the recording of the Minutes of the Management Review of PT PWS which was carried out on February 21, 2022. In summary, these activities cover the following:

- Review SIA Management Plan 2021-2022
- Results of Stakeholder Consultation and SIA Management 2021-2022
- Review External Audit Results
- Review Results of Internal Audit RSPO & ISPO 2022
- Results of Monitoring HCV, Important Species and Identification of Flora 2022
- Sustainability Review

Thus, it can be concluded that the company has conducted 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 unit of certification has carried out an RSPO Audit on August 22 – 26, 2022, the results of the internal audit activity found 12 non-compliances with details of 8 Major non-conformities and 4 non-critical non-compliances. The results of all these non-conformances has been closed before initial certification RSPO has been conducted.

The management unit also known has developed and implemented an action plan for continuous improvement and it is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification, such as:

#### **BMP Aspect**

- The company no longer uses pesticides with the active ingredient paraquat dichloride.
- The Company has implemented integrated pest control including the use of beneficial plants, installation of barn owl boxes, and installation of pheromone traps.
- There is no land clearing by burning.

#### **OHS**

EHS Representative activities for the formation of an EHS representative team in each unit that monitors the implementation of OHS every 6 months.

#### **Environment**

Certification unit has taken actions for continuous improvement in environmental aspects, for example:

- Management and monitoring of air quality through road maintenance, air quality testing and reporting to the Musi Banyuasin District Environmental Office.
- Hazardous waste management through hazardous and toxic waste storage and management and monitoring of hazardous and toxic waste and reporting it to the Musi Banyuasin District Environmental Office.
- Greenhouse Gas (GHG) Management. Implementing a zero burning policy, utilizing EFB, shells and fiber as renewable energy, regular engine maintenance, and regular emission quality tests.
- The company has managed HCV well and cooperated with the BKSDA to carry out an inventory of protected species.

#### 3.2.2

Based on document verification, for The RSPO metric template known annual data 12-month periods use (January to December 2021) for schedule reporting annual data peat area, pesticide usage, average LTIFR (Lost Time Injury Frequency Rate) and fresh water usage.

Certification Unit already has an annual report document using the RSPO metric template format that has been provided to the auditor team at the time of the assessment. The data presented can be ascertained in accordance with the existing raw data.

Certification Unit already has an annual report document using the RSPO metric template format that has been provided to the auditor team at the time of the assessment. The summary in the report, for example, is as follows:

Name of RSPO Member	:	Kuala Lumpur Kepong Berhad
RSPO Membership Number	:	1-0014-04-000-00
Name of Certified Unit	:	PWS POM and Supply Bases
Name of Certification Body	:	PT MUTU AGUNG LESTARI
RSPO PalmTrace ID Number	:	RSPO_PO1000004135
Number of Mills	:	1
Number of Estates	:	3
Production Area (ha) - Estate	:	13824
Certified Area (ha) - Estate	:	14980
High Conservation Value (HCV) Area (ha)	:	85
Peatlands - Planted (ha)	:	829
Freshwater Usage per PO produced tonne	:	693,636

**Status: Comply**

### 3.3

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

##### 3.3.1

The company shows procedural documents for example:

- SSOP 9. Land clearing and replanting.
- SSOP 7. Seedling, Planting and Maintenance of Oil Palm Plants, revision 3 dated 15 November 202.
- SSOP.17. Integrated Pest Management and Control (IPM)
- SSOP No. 18 concerning the Safety of Chemical Use and Storage including Hydrocarbons No. Revision 2 March 25, 2020
- SSOP with number SOP.10. Maturity Standard of Fresh Fruit Bunches (FFB) and Harvest Revision 1 dated August 10, 2017.
- SSOP 11. Transport of Fresh Fruit Bunches (FFB) to Palm Oil Mills Revised 01 on 10 August 2017.
- SOP 39. Receipt of Fresh Fruit Bunches (FFB) at the Palm Oil Mill Revision 01 dated 10 August 2017.
- Standard Operating Procedures (SOP) for Palm Oil Mills Version 2 dated 5 May 2020.

Based on the results of field visits and interviews with workers, for example in spraying and harvesting activities, it is known that workers already know and can briefly explain the work procedures in their respective areas. Thus, it can be concluded that the company already has an SOP that covers all activities in the Mill and Estate and has been understood by the workers.

All SOP above were available in Bahasa. Master list of procedure for estate and mill were keeps by Head of Research and Development and Head of Engineering, respectively. Document control of SOP was conducted by General Manager of Administration and SOP Management Compliance. Based on SOP document review, it could be concluded that all SOP's were still relevant with current situation and covers all aspect of best management practices in the estates and mill.

This procedure is conveyed to workers in the form of training and installation of related procedures at certain stations/ locations, as well as installing processing work instructions at each Mill station and installing work instructions for hazardous waste management in chemical warehouses.

Based on field observations at the mill and estate during the audit, it is known if procedures have been implemented and workers can describe and demonstrate their work according to the procedures, referring to operational, safety and environmental best practices.

##### 3.3.2

As a mechanism to ensure that procedures have been carried out consistently, the company has procedures related to internal audits as contained in the SSOP 14 document. Sustainability Audit No Revision 2 dated January 25, 2019

which informs about the certification system (RSPO, ISPO, ISCC and RSPO SCCS) which audit frequency is carried out at least 1 x a year. Thus, it can be concluded that the company already has a mechanism to ensure that the procedures are carried out consistently. In addition, the results of work carried out by contractors are also examined, one of which is at the time of submitting payment.

These procedures include explaining that the internal audit operation as the internal controller of plantations and mills ensures the implementation of Best Practices. According to SOP and help share information/ technology for improvement by Internal Audit operation (Mandau Central Laboratory, MCL still 1 KLK group). If there is a nonconformity, the Estate/ Mill must provide feedback after 1 month of being sent to Internal Audit Division. There is also a quality assurance audit and recommendations carried out by the Internal Audit operation, a quality assurance audit for mill and estate in December 2021, the audit report also discusses the results of inspections on the implementation of mill and estate operational procedures consistently every year.

### 3.3.3

The company shows records of monitoring and follow-up, for example:

- The ISPO Internal Audit Report of PT PWS conducted on 22-26 August 2022, in this activity 7 non-conformities, but during the audit activity all non-conformities were met.
- The RSPO Internal Audit Report of PT PWS on April 22-26 August 2022, in this activity found 8 Critical Non-conformities and 4 Non-Critical Non-conformities but by the time the audit activity took place all non-conformities had been met.
- Internal Audit Report with audit scope of General Security & Safety, IT Security & Systems, Stocks & Stores, Operation Management, Finance & Administration such as:
  - Pangkor Estate Internal Audit Report dated March 23, 2022.
  - PWS POM Internal Audit Report dated July 11, 2022.

Based on the document, the monitored operating procedures include grading inspection conditions, mill cleanliness condition inspections, mill performance indicator inspections (processes, laboratories, machines), FFB processing inspections and processing capacity, production achievements, oil content testing, waste condition inspections (effluent), check SOP index and others.

Thus, it can be concluded that the company shows evidence of documentation related to monitoring and its follow-up has been.

	<b>Status: Comply</b>
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## 3.4

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

### 3.4.1

#### Environmental Impact Assessment

Unit of Certification already has environmental documents in the form of Addendum Documents on Environmental Impact Analysis (Andal) Environmental Management Plans, Environmental Monitoring Plans (RKL-RPL) for Oil Palm Plantations Increased Palm Oil Processing Capacity in Bayung Lencir District, Musi Banyuasin District Sumatera Selatan Province, HGU Area: 14,980.49 Ha with Mill Capacity: 60 Tons to 90 Tons FFB/Hour. Certification unit already has an identification document for High Conservation Value Areas (HCV) which is contained HCV Study Report document in the May 2022. Based on the identification results, the HCV area is 43.30 Ha.

#### Social Impact Assessment

Unit of Certification has an initial SIA review document issued in April 2022 by an assessor from Aksenta and has involved the community in the review. The study was aimed at 3 villages namely Muara Merang Village, Mangsang Village, Kepayang Village. Based on the results of the study document, recommendations for the SIA program were obtained which were then used as the basis for preparing the PT PWS SIA Management Plan and Monitoring Plan for the January – December 2022 program period. The preparation involved the three villages together with PT PWS internal stakeholders in a participatory way through FGDs for example on November 1, 2022.

Based on interview communities, all social issue has been covered in SIA.

### 3.4.2

Unit of certification has conduct Environmental Management in accordance Environmental Management Plan such as manage community income, soil fertility, water quality, public health, noise level, air quality and community perception.

Besides that, Unit of Certification also conduct the Social Management in accordance with SIA management plan, such as housing condition, education facilities, wages, working hours, women worker, grievance procedure, worker union, clinic, domestic waste, replanting, CSR, legal boundaries, employment, business opportunity, environmental and economy, health and land fire, infrastructure, etc.

Unit certification in composing CSR Program, SIA Program, and HCV program were involving affected local communities that are Mangsang Village, Muara Merang village, and Kepayang Village through Focus Group Discussion while also composing for SIA Program and was proven by the photo documentation and attendance list for the FGD participant.

Based on interview with communities and government agency, known that there is no negative impact from PWS operational activities. However, there is some issues about demonstration of demands from community representatives regarding PT PWS' obligations in the construction of the plasma. From the results of the verification, information was obtained that issues was true where there were demands from several community representatives through the *Forum Komunikasi Pemuda Kepayang Merang Bersatu* (F-KPKMB) to PT PWS regarding the obligation to build the plasma, but this was resolved in the District Court with the issuance of a Deed of Peace (Deed of Van Dading) Number: 1/Pdt.G/2022/PN.Sky on 14 July 2022 by the Sekayu District Court which stated that the parties were willing to end the dispute between them as stated in the Claim Letter dated 26 January 2022 with the Case Register Number 1/Pdt.G/2022/PN.Sky and for this matter the Parties have entered into a written Agreement in the form of a Peace Agreement dated 13 July 2022 and the Parties have signed the Peace Agreement.

In summary, the contents of the agreement are that PT PWS is willing and responsible as an avalist in facilitating the development of community oil palm plasma plantations in 3 villages, namely Muara Merang Village, Mangsang Village and Kepayang Village with all costs for the development of community plantations including costs for arranging permits and changing status functions Production Forest area to be an Area for Other Uses (*Area Penggunaan Lain*) on land proposed by the community, where all management costs will be calculated as debts of farmers and/or farmer cooperatives and will be paid in stages after the plasma plantations produce a harvest of oil palm fruit and then the construction of the oil palm plasma plantations will be realized by PT PWS after obtaining all permits from the Government of the Republic of Indonesia and other related agencies.

### 3.4.3

Based on RKL-RPL report in semester 1 of 2022, sighted that all environmental quality has been accordance with Standard Quality.

Based on the results of interviews with the company's management, it is known that PT PWS has just experienced a takeover or transition period from the old management unit to the KLK Group management unit in October 2021. For example, an SIA review will only be conducted in November 2021 and will only be completed in April 2022. This has resulted in PT PWS not being able to conduct a management review and evaluation of the implementation of the program because the program is not even 1 year old.

Based on verification related to program realization, there was some program that already been executed well in 2022 for example: Housing Condition, Education Facilities, Grievance Mechanism already monitored, documented, and implemented well.

Status: Comply

### 3.5

**A system for managing human resources is in place.**
**3.5.1**
**Selection and Recruitment of Workers**

The company has a recruitment procedure set out in the Sustainability Standard Operating Procedures (SSOP) document Number 29 Revision 4 effective April 10 2019 which was approved by the R&D Director. The procedure explains that the minimum age for workers is 18 years, recruitment information is done openly, recruitment is free of charge, and there is no retention of workers' personal documents.

Apart from that, in the Collective Labor Agreement for the 2021 – 2023 period which was ratified by the Head of the Manpower and Transmigration Office of the Musi Banyuasin District Number 560/260/IV/Disnakertrans/2021 dated 24 May 2021, Chapter IV regarding Employment Relations and Probation Period also explains regarding employee recruitment. As well as the selection of prospective employees according to the criteria set by the company. Workers who have passed the selection must be willing to enter into a work agreement with the company in accordance with the management's decision and undergo a probationary period of at least 3 (three) months with the probationary period being counted as working period.

**Promotion**

Promotions are regulated in the Collective Labor Agreement for the period 2021 – 2023 which was ratified by the Head of the Manpower and Transmigration Office of the Musi Banyuasin District Number 560/260/IV/Disnakertrans/2021 dated 24 May 2021. The document explains, for example, that employees who have passed the probationary period will be Appointed as a permanent employee, the company carries out a transfer taking into account the skills, abilities and career path.

**Pension**

In the Collective Labor Agreement for the period 2021 – 2023 which was ratified by the Head of the Manpower and Transmigration Office of the Musi Banyuasin District Number 560/260/IV/Disnakertrans/2021 dated 24 May 2021 it has regulated pensions in Article 33, briefly including:

- After serving 30 years or more, and/or reaching the age of 55, an employee is entitled to a full pension.
- Except at the request of the company, an employee will be retired at the age of 55, and can be extended to work at the company after his rights are fulfilled by the company.

**Work termination**

Termination of employment has been contained in the Collective Labor Agreement for the period 2021 – 2023 which was ratified by the Head of the Manpower and Transmigration Office of the Musi Banyuasin District Number 560/260/IV/Disnakertrans/2021 dated 24 May 2021. Briefly as follows:

- The company tries to avoid termination of employment as much as possible
- Termination of employment will be carried out if:
  - Employees have been given Warning Letter III or last but still commit violations again.
  - Employees are sick consecutively for more than 12 months.
  - The employee violated article 43 of the collective labor agreement by considering the seriousness of his mistake.
- For employees who will resign, they must submit an application at least 1 month in advance and are entitled to get long service award money.
- Every employee whose employment relationship is terminated due to a mistake or if the company changes status, merges, consolidates or changes in ownership, everything refers to Law Number 13 of 2003.

**3.5.2**

Company has demonstrated that all employment procedure has been consistently implemented and records are maintained. Evidence showed as seen below:

- Recruitment of the Sustainable Grik Estate workforce with the initials "ARA" who joined on 25 August 2022 with a probationary period of 3 months, with documentation including: worker identity and complete job applications, initial

health check data, Permanent Worker's Work Agreement No. 1617/GM/PWS/VIII/2022 dated 25 August 2022, as well as proof of receipt of SPK by employees.

- Retirement record dated June 15 2022 for Harvester Grik Estate with the initial's "H" as of the end of June 2022 with a working period of more than 13 years along with the calculation of severance pay, money for years of service, and calculation of other rights in accordance with applicable laws and regulations.
- Record of Resignation dated November 15 2022 for Pangkor Estate Harvesters with the initial's "G" as of November 25 2022 with a working period of more than 8 years along with calculations for payment of resignation payments and calculations of other rights in accordance with applicable laws and regulations.
- The company shows promotional records, for example the appointment of wholesale employees to PGHT (PKWTT) out of 5 harvesters it is known that 4 harvesters have passed based on the results of performance appraisal and attendance.

Based on the results of interviews with representatives of the trade unions, it was stated that the company had carried out the employment procedures properly and there had been no complaints from employees regarding the implementation of the established procedures.

<b>Status: Comply</b>
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### 3.6

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

##### 3.6.1

The company shows the Risk Identification Results document and the implementation plan for Mill and Estate which is contained in the Hazard Identification, Risk Analysis, and Risk Control document prepared by the PT PWS Team on the last review date of July 18, 2022 already covered Estates and Mill operational activities. The document explains, among others: Hazard Identification (Work Activities, Source of Hazard, Risk/Impact), Risk Analysis (Current Risk Control, Frequency, Severity/Consequence, Risk Level), Risk Control (Actions to reduce risk, Responsible Person).

Based on the results of field visits and interviews with workers, for example in PWS POM (St. Boiler) and Fertilizer Storage Pangkor Estate, it is known that workers have understood the sources of hazards and risks that exist in their work area and have used PPE in accordance with what is specified in the Identification document. Hazards, Risk Analysis, and Risk Control.

Thus, it can be concluded that the company has demonstrated that all operational activities have been assessed for risk to identify OHS problems and that mitigation plans and procedures are documented and implemented.

##### 3.6.2

The company shows evidence of monitoring the effectiveness of OHS dated 4 July 2022, including through:

- Periodic inspection of completeness and condition of emergency response facilities such as fire extinguishers, first aid kits/bags and hydrants.
- Monitoring the validity period of the license owned by the operator as well as testing and inspection of OHS equipment and machinery.
- Monitoring the completeness and compliance of the use of PPE

In addition, based on the results of interviews with workers at the Estate and Mill, it was stated that the company has carried out health checks for employees including special health checks for workers with certain risks and general examinations for all employees, in addition the company also conducts initial health checks for new workers.

The last health check was carried out on January 17-26, 2022, in collaboration with the Nurul Medika Clinic. Based on the results of a general health examination, information was obtained that there were 774 employees from all plantations, transportation, regional offices and 188 POM employees. From the results of the general examination, it was concluded that 27 estate employees and 18 Mill employees had health problems with a diagnosis of mild hypertension and were advised to carry out further consultations with specialist doctors. In this regard, the company showed the minutes of follow-up inspections for 27 plantation employees and 18 mill employees which were carried

out on February 22, 2022. The company also conducts laboratory tests (thorax, audiometry, auto spirometry and cholinesterase) for workers working in high-risk areas and chemical handlers with 36 POM employees, 101 Grik estate employees, 121 Pasir Salak estate employees and 81 employees Pangkor estate. The results of the general health check of employees are in good health for work.

The company has monitored the validity period of the OHS license for each operator who requires an OHS license, based on the results of the verification of the OHS license monitoring document as of June 2022 it is known that several OHS operator licenses are still in the process of obtaining it for Steam Aircraft and Pressure Vessels, Electrical Technicians, OHS expert Electricians and OHS expert Fires. Companies are encouraged to ensure the issuance of OHS licenses for every operator that requires an OHS license. **OFI**

<b>Status: Comply</b>
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### 3.7

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

##### 3.7.1

The training system has been contained in the SSOP 29 document concerning Worker Management No. Revision 5 dated 13 January 2021. In summary, the document explains, among others:

- Identification of training needs based on employee evaluations and non-compliance obtained during internal and external audits
- Provide training if the exchange of work functions and production processes
- To comply with the new regulations, information on the new regulations can be provided in the form of outreach
- Provide training after an accident according to the results of the investigation

The company indicates a training program, for example for the Grik Estate 2022 which provides a planned implementation timeline, training topics, targets of trained personnel and instructors. As for training plans such as spraying training, harvester training, first aid training, sustainability training, etc.

Based on the results of interviews with contractors and FFB supplier, it was conveyed that training for contractor and FFB supplier workers was carried out through socialization when checking work in the field such as socialization of job criteria, OHS and best management practice on plantation.

##### 3.7.2

The company shows training records, for example:

- Spraying training for Grik Estate workers on 27 January 2022 which was attended by 17 participants.
- First aid training on 4 & 5 March 2022 which was attended by 63 participants
- Sustainability training on 13 May 2022 which was attended by 7 participants
- Letters from the OHS Service Company regarding the completion of operator certification training, for example the OHS Expert of Electricity, as well as 15 Power and Production Machine operators on 22-25 August 2022.

##### 3.7.3

The unit of certification showed socialization about the supply chain to employees which was last conduct on 2 December 2022. The minutes explained the procedures for managing certified and non-certified products including the responsibilities for each of the personnel who handle products.

Based on the interviews with weighbridge officers and security, the two personnel have been able to explain well about the management of certified and uncertified products, especially regarding the origin of the FFB source.

<b>Status: Comply</b>
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### 3.8

#### **Supply Chain Requirements for Mills**

##### **3.8.1 and 3.8.2**

The mill plans to use supply chain module Mass Balance (MB) as it is still receiving FFB from certified and uncertified sources. The implementation of this module will be verified further at annual surveillance audit.

**3.8.3**

The estimates of certified production for the next license period describe at Initial Certification report (basic info 1.8.3), in reasonable amount taking into account the last year's production.

**3.8.4.**

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

- Member Name: PT Pinang Witmas Sejati
- Commodity: Palm Oil
- Member ID: RSPO\_PO1000004135
- RSPO Membership Number: 1-0014-04-000-00 (subsidiary of Kuala Lumpur Kepong Berhad)
- Type of Business: Oil Mill
- License status: Not Licensed

**3.8.5.**

The unit of certification can present procedure of SCCS are describe in SOP 32 revision 3 dated 2 May 2020. In the procedure described all aspect that required in SSCS model are FFB Received, Documentation of CSPO and CSPK Product, responsible persons / PIC, training, production and storage, selling and dispatch, the handling of non-conformity product and reporting.

In the SOP has been describes regarding to the key personnel involves and responsible, namely:

- Mill manager: will guarantee the implementation and compliance to the SOP, monitoring the balance of certified products in palm trace and ensure that each contract has been announced to RSPO, communicate with CB if there is a change in supply chain model and reporting if there is over-production
- Dept of sustainability: is responsible for conducting an internal audit of the SCCS implementation on an annual basis and ensuring correction to nonconformities have been applied
- Marketing division: is responsible for issuing sales contracts, arranging shipments and making claims on non-conforming product and accepting payment invoices, carrying out shipping announcements for each sale to RSPO
- Assistant: is responsible for checking safety seals and ensuring availability of shipping documents
- Weighbridge operator: responsible for ensuring all product shipping documents are complete (company name, estates name, ticket number, tonnage number etc.)

Based on interviews in PWS POM note that the weighbridge operators understand the supply chain management system. It also known that training and refreshment (awareness) of supply chain management system were carried out, for instance on 2 December 2022.

**3.8.6.**

The mill has no certified yet, however based on document review, the company show the record evidence regarding internal audit of RSPO SCCS that conducted on 22-26 August 2022. Based on result of internal audit, there is no non-conformity and complied with RSPO Supply Chain requirements for mills and the RSPO Rules on Market Communications and Claims.

Management Review of RSPO SCCS implementation conducted on 22 November 2022. The management review discussion has covered the input from internal audit result, correction and corrective action, customer feedback, process Performa and product compliance, follow up of previous management review, actions taken regarding the findings and recommendation for improvement.

**3.8.7**

The mill has no certified yet, so there is no overproduction of certified tonnage. Mechanism to handle non-conforming palm oil products is contained in SOP of RSPO Supply Chain No. SOP 32 revision 3 dated 2 May 2020. In point 10 regarding the handling of non-conforming products/documents it is explained:

- If there are products/documents that are not acceptable to the buyer, an investigation must be carried out to formulate the root of the problem so that appropriate corrective and preventive actions can be taken.
- Evidence of corrective and preventive actions must be documented
- During the management review, these matters should be discussed as to the effectiveness of the Preventive actions taken.

**3.8.8.**

The mill has no certified yet. The minimum information for RSPO certified products on sales will be verify at annual surveillance audit. The minimum information for RSPO certified products that need to be verify are:

- The name and address of the buyer;
- The name and address of the seller;
- The loading or shipment / delivery date;
- The date on which the documents were issued;
- A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);
- The quantity of the products delivered;
- Any related transport documentation;
- A unique identification numbers.

**3.8.9**

The company has not certified yet and there are no certified products, so there is no contract with a third party in handling certified products. However, the mill has an agreement with the CPO and PK transporter from the mill to the buyer. This matter will be verified further at the annual surveillance audit when the company has certified products.

**3.8.10 and 3.8.11**

The company has not certified yet and there are no certified products, so there is no contract with a third party in handling certified products. However, the mill has an agreement with the CPO and PK transporter from the mill to the buyer such as agreement with PT Alfarabby Barokah Mandiri, PT Mulia Borneo Mandiri, PT Pelangi Muda Sejahtera and Jaya Mitra Bersama Cooperative. This matter will be verified further at the annual surveillance audit when the company has certified products.

**3.8.12**

The mill has not certified yet, so the records of certified products will be verified at annual surveillance audit.

**3.8.13 and 3.8.14**

The mill has not certified yet. However, the conversion rate of production of CPO (OER) and PK (KER) were based on actual daily, monthly and yearly production. This matter will be verified further at annual surveillance audit.

**3.8.15**

The mill has not certified yet, so this indicator will be verified at annual surveillance audit.

**3.8.16, 3.8.17**

The mill has not certified yet, so there is no transaction or claim that registered in RSPO IT Platform. This matter will be verified further at annual surveillance audit.

**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**

UoC showed the human rights policy stated in KLK Group Sustainability Policy updated on 30 August 2018 validated by CEO. This policy generally explained KLK group committed to respect and protect human rights, briefly as follows:

- Recognizing the inherent dignity of every person and supporting the Universal Declaration of Human Rights by the United Nations, including the prohibition of taking retaliatory acts against Human Rights Defenders ("Human Rights Defenders") in accordance with the United Nations Declaration on Human Rights Defenders.
- Respect and uphold the rights of all workers, including contract, temporary and migrant workers, by the core conventions of the International Labour Organization, the UN guiding principles on Business and Human Rights and the principles of Free and Fair Employment in Palm Oil Production as a guide.
- Ensure compliance with ratified local, national and international laws and that international best practice is applied where a legal framework is not yet in place

UoC's commitment in respecting the human rights has been well implemented proved by the absence of issues and incidents of human rights violations that occurred in the operational area both mill and estate. Based on the interview with workers in estates (harvesters, pesticide sprayers, and maintenance workers), workers in mill (mill operators and warehouse officer), they stated that there were no incidents or issues of human rights violations occurring in the operational area of the certification unit.

In addition, based on the results of interviews with representatives of contractors and surrounding communities, it was also conveyed that the company had provided information related to human rights policies and mechanisms for handling complaints and grievances.

**4.1.2**

Based on the interviews with the surrounding communities, and workers, it revealed that up until this assessment, if there was any conflicts or disputes with the company, the resolution action taken was deliberation without involving any violence or mercenaries. Resolution of conflicts or problems using these deliberations has been quite effective and during the past year there have never been any conflicts / problems in UoC's work area.

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

UoC showed the policy related to the procedure in handling any grievances (No. SSOP 01 Rev-04) validated on 25 October 2021 concerning in handling grievance and consultation for all stakeholders. The policy explained the activities of handling grievances related to general grievance from internal stakeholder and special grievance from external grievance. The mechanism of handling grievance, is stated generally as follows:

- The company's commitment to protect the anonymity of whistle-blowers.
- The mechanism of delivering grievance from illiterate people.
- The mechanism of handling any grievances and access to the Manpower Agency (tripartite).

**4.2.2**

In the document SSOP 01 Rev-04) validated on 25 October 2021 it is also explained regarding the provision of information to parties who cannot read or write, done through:

- Use of pictures/posters
- Use of audio visuals
- Representatives who can read and write

**4.2.3**

PT PWS is a company that was taken over by the KLK group in October 2021 and is a transitional year in implementing procedures, which began to run effectively in early 2022 so that the grievance data in the Metric Template for the 2021 period has not been recorded. However, complaint documentation has been recorded in the Stakeholder Logbook document which informs requests, consultations and communications as well as complaints and grievances addressed to the company both internally and externally. Based on the results of the document review, it is known that incoming letters from internal and external stakeholders are in the form of complaints about housing conditions, requests for information or assistance also complaints or grievances.

Based on the results of a search by the auditor team in online media, several news links were found in early 2022 with the same content, namely a demonstration of demands from community representatives regarding PT PWS' obligations in the construction of the plasma. Some of the news even explained that the lawsuit had been brought to court but the results of the court's decision had not been informed in the news. In this regard, the auditor verified by conducting consultations through interviews with relevant agencies, Mangsang Village, Muara Merang Village and also PT PWS management representatives to obtain more complete information. From the results of the verification, information was obtained that the news was true where there were demands from several community representatives through the *Forum Komunikasi Pemuda Kepayang Merang Bersatu* (F-KPKMB) to PT PWS regarding the obligation to build the plasma, but this was resolved in the District Court with the issuance of a Deed of Peace (Deed of Van Dading) Number: 1/Pdt.G/2022/PN.Sky on 14 July 2022 by the Sekayu District Court which stated that the parties were willing to end the dispute between them as stated in the Claim Letter dated 26 January 2022 with the Case Register Number 1/Pdt.G/2022/PN.Sky and for this matter the Parties have entered into a written Agreement in the form of a Peace Agreement dated 13 July 2022 and the Parties have signed the Peace Agreement. In summary, the contents of the agreement are that PT PWS is willing and responsible as an avalist in facilitating the development of community oil palm plasma plantations in 3 villages, namely Muara Merang Village, Mangsang Village and Kepayang Village with all costs for the development of community plantations including costs for arranging permits and changing status functions Production Forest area to be an Area for Other Uses (*Area Penggunaan Lain*) on land proposed by the community, where all management costs will be calculated as debts of farmers and/or farmer cooperatives and will be paid in stages after the plasma plantations produce a harvest of oil palm fruit and then the construction of the oil palm plasma plantations will be realized by PT PWS after obtaining all permits from the Government of the Republic of Indonesia and other related agencies.

#### 4.2.4

UoC showed the policy related to the procedure in handling any grievances (No. SSOP 01 Rev-04) validated on 25 October 2021 concerning in handling grievances and consultation for all stakeholders. The policy explained the activities of handling grievances related to general grievance from internal stakeholders and special grievance from external grievance.

In addition, in the SSOP 6 document regarding the Revision 1 Land Dispute Settlement Procedure dated 3 June 2018 it is also explained that the negotiation process may involve independent third parties such as National Land representatives and NGOs.

<b>Status: Comply</b>
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### 4.3

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

#### 4.3.1

Unit certification is already known to involve the local communities in providing some program as in CSR program through some FGD involving 3 local communities such as Muara Merang Village, Kepayang Village, and Mangsang village, to identify the needs and suitability program that was delivered and discussed both ways between local communities and company. This FGD also discuss about drafting for SIA's program which one of the thing tha has been discussed was about request to establish plasma plantation for local surroundings communities. This involvement was proven by the photo documentation, and attendance list that are shown to auditor team.

Based on thorough verification by documents, and interview with local communities, Plantation Agency, and Human Resources Department of the Unit Certification's results it is known that demands to establish plasma plantation for

local communities only from some parties of the communities. This case already been proceed to the court and has reached final decision where the company will voluntarily provide for plasma plantation development, and local communities has to provide the company for the land that are will be used to build plasma plantation. Based on auditor verification, and court final results, it is also known that unit certification already made some progress related to this case, that are conduct mapping for community land that can be used as plasma plantations, local communities already proposed land area of land area of approximately 5,000 Ha, but this area is included in the Production Forest area. The company stated that it was waiting for the proposed land to be converted first into APL so that it could be processed for clearing into plasma land.

However, Unit Certification already offering a joint partnership program with Local Communities in the form of managing community oil palm plantations to increase production and productivity such as procurement of fertilizers, harvesting equipment, spray equipment, technical guidance on oil palm cultivation, maintenance and repair of infrastructure, processing of community FFB, planting of community oil palm plantations including replanting and others.

Based on that explanation above, it is known that issue of plasma plantations already covered and are now in progress to be monitored and covered through SIA program and was not include in CSR program. Meanwhile, based on verification data through CSR Implementation Report of PT Pinang Witmas Sejati in Semester I Year 2022 that has been inform to the Secretariat of the MSH-CSR forum of Musi Banyuasin Government Agency in Sekayu, November 29, 2022, via letter number 2249/MGR-HMS/PWS/VII/2022, it is known that CSR program focused on some pillar such as Infrastructure, Education, and Community empowerment.

Implementation of CSR consist of:

- Infrastructure development such as Assistance for building mosques
- Community Empowerment such as teacher incentive
- Community and Social Relations such as covid vaccinated
- Religion Teacher Incentive Assistance in Mangsang Village
- Operational costs for procuring teaching teachers for 3 Elementary School units and 3 Kindergarten units in Mangsang Village
- Assistance with diesel fuel for generator operations in Mangsang Village and Muara Merang Village
- Assistance in building a prayer room in Muara Merang Village

Based on interview with local communities, such as Muara Merang Village, it is known that there was no negative issues related to CSR program implementation.

	<b>Status: Comply</b>	
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#### 4.4

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

##### 4.4.1

PT Pinang Witmas Sejati has legally obtained land rights in the form of HGU from the government with a total area of 14,980.49 Ha with the following details:

- Decree of the Minister of Agrarian Affairs/Head of the National Land Agency No. 10/HGU/BPN/99 issued on 10 February 1999 granted PT Pinang Witmas Sejati an HGU with an area of 14,738.4 Ha and is valid for 35 years from the date of the decision. Then the HGU Certificate Number 01/MUBA was issued on March 23, 1999 with an area of 14,738.4 Ha and is valid until March 22, 2034.
- Decree of the Head of the National Land Agency Number 32/HGU/BPN/2003 issued on 12 May 2003 granted PT Pinang Witmas Sejati an HGU with an area of 242.09 Ha and is valid for 35 years from the date of the decision. This decree was given for the development of oil palm plantations. Then the HGU Certificate Number 09/MUBA was issued on July 1, 2003 with an area of 242.09 Ha and is valid until June 30, 2038.

Based on this explanation, it can be concluded that the unit of certification already has HGU with an area according to laws and regulations in the field of plantation business licensing.

**4.4.2**

Based on public consultation with previous landowner (from 16 samples of people determined by the auditor team, only 2 people were successfully interviewed) and village representatives Muara Merang Village and Mangsang Village, known that there was no customary right in or near the concession area of PT PWS. All land acquisition between local people and company representatives conducted as mutual agreement and with Bahasa that understood by all parties involved. The compensation process is done directed to the landowner and not diminish the legal/customary right; landowners are given the freedom to release their land without coercion.

Based on sample of land acquisition documentation, it was known that the land acquisition has been made in FPIC manner. The documents have been made in Indonesian language, also has involved and witnessed by community representatives such as Village Head and Sub-District Head.

Based on information from PT PWS management representatives, it was conveyed that PT PWS is currently a take over from the previous owner, namely Ladang Lekir Sdn Bhd and as of October 2021 has become the property of the KKK Group. However, unit of certification can show the recapitulation of compensation or relinquishment of land rights carried out in 1997 in Mangsang Village with an area of 103.165 Ha and in Muara Merang Village with an area of 808 Ha. The company also shows several documents as proof of the initial process of land acquisition, for example:

- A statement letter renouncing land rights from Janto Kar to PT Pinang Witmas Sejati for a land area of 18 Ha dated September 30, 1997, which was also known and signed by the Bayung Lencir Sub-District Head and the Muara Merang Village Head.
- Certificate of Land in the name of Janto Kar for an area of 18 Ha issued by the Head of Muara Merang Village on 16 April 1978
- Minutes of agreement on payment of compensation between PT Pinang Witmas Sejati and Janto Kar dated 30 September 1997 which was also acknowledged and signed by the Head of the Bayung Lencir Sub-District and the Head of Muara Merang Village.
- Receipt of compensation payment for 18 Ha of land in the name of Janto Kar dated 30 September 1997

Based on the Decree of the Head of the Level II Regional Head of Musi Banyuasin dated 28 November 1998 Number 595/007/II/1998 explained that the area of 14,738.4 Ha which had been issued Map Drawings of Special Situations dated 24 February 1997 Number 1/1997 was entirely physically controlled by PT PWS with details:

- An area of 931.35 Ha is freed from community control/ownership.
- An area of 13,806.05 Ha of free State land where there is no community control/business.

Based on the data above, it can be concluded that the company has carried out the obligation to acquire land within the HGU area from the rights and interests of other parties.

**4.4.3**

The company can show a map showing legal rights in the form of a HGU boundary map with a scale of 1: 50,000 and 1:15,000 contained in the HGU certificate issued by the Land Office that developed through participatory mapping. Based on public consultation with village representatives from Muara Merang Village and Mangsang Village, it is recognized that they know the legal boundaries owned by PT Pinang Witmas Sejati.

Field observations to several HGU boundary markers in Pasir Salak Estate (Stakes No. 01, 142 and 165); Pangkor Estate (Stakes No. 49, 111, 127 and 128) and Griik Estate (Stakes No. 104, 108, 84b and 85a), show that the stakes sampled during the audit were available in the field and in well-maintained conditions. Verification using GPS indicates that the pole coordinate is in accordance with the provisions of the land title. Land boundaries with outsiders are clear, such as a large boundary road and trench that borders the HGU area. There is no indication of land use outside the HGU.

**4.4.4**

As explained in 4.4.2, it is known that the negotiation process for land release has been carried out in a fair, open, and transparent manner and is based on the agreement of both parties without any coercion from either party. The

community represents itself in the process. All relevant information regarding land acquisition is available in appropriate forms and languages.

#### 4.4.5

As explained in 4.4.2, it is known that the negotiation process for land release has been carried out in a fair, open, and transparent manner and is based on the agreement of both parties without any coercion from either party. The community represents itself in the process.

#### 4.4.6

The company has an initial SIA review document issued in April 2022 by an assessor from Aksenta and has involved the community in the review. The study was aimed at 3 villages namely Muara Merang Village, Mangsang Village, Kepayang Village. Based on the results of the study document, recommendations for the SIA program were obtained which were then used as the basis for preparing the PT PWS SIA Management Plan and Monitoring Plan. The preparation involved the three villages together with PT PWS' internal stakeholders in a participatory way through FGDs, for example on November 1, 2022. Related to the issue of plasma development has also been discussed in the SIA review and PT PWS is already in progress in the development as explained in indicator 2.1.1

Based on the results of interviews with stakeholders (Muara Merang Village and Mangsang Village), it was informed that the company has had a positive impact to the affected village community such as employee recruitment, economic movement, and CSR assistance. The company regularly holds meetings with community representatives and absorbs community aspirations which are applied in company policies such as CSR or other assistance. Communication with the community is no problem, every request for information is always responded to by the company.

**Status: Comply**

#### 4.5

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

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

There is no new planting activity during this audit. Based on document Identification of HCV and stakeholder consultation, there was not found customary/indigenous rights in operational area. There were the records of the process of collecting information on the preparation of the High Conservation Values Identification Report and the Social Impact Assessment Report. The recording evidence comprising of participants' list and photographs.

**Status: Comply**

#### 4.6

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

##### 4.6.1

The company has procedure of Land Acquisition and Compensation, document SOP No 5 about Land Acquisition, revision 2 dated 3 June 2018 related to identifying legal, customary or user rights, and for identifying people entitled to compensation. Based on public consultation with village representatives from Muara Merang Village and Mangsang Village known that they know about the procedure through the socialization given and they agree with the procedure.

##### 4.6.2

The company has procedure of Land Acquisition and Compensation, document SOP No 5 about Land Acquisition, revision 2 dated 3 June 2018. The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on public consultation with village representatives from Muara Merang Village and Mangsang Village known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the landowner and landowners are given the freedom to release their land without coercion.

**4.6.3**

PT Pinang Witmas Sejati does not yet have a plasma or smallholder scheme for local communities.

**4.6.4**

Based on information from PT PWS management representatives, it was conveyed that PT PWS is currently a take over from the previous owner, namely Ladang Lekir Sdn Bhd and as of October 2021 has become the property of the KKK Group. However, unit of certification can show the recapitulation of compensation or relinquishment of land rights carried out in 1997 in Mangsang Village with an area of 103.165 Ha and in Muara Merang Village with an area of 808 Ha. The company also shows several documents as proof of the initial process of land acquisition, for example:

- A statement letter renouncing land rights from Janto Kar to PT Pinang Witmas Sejati for a land area of 18 Ha dated September 30, 1997, which was also known and signed by the Bayung Lencir Sub-District Head and the Muara Merang Village Head.
- Certificate of Land in the name of Janto Kar for an area of 18 Ha issued by the Head of Muara Merang Village on 16 April 1978
- Minutes of agreement on payment of compensation between PT Pinang Witmas Sejati and Janto Kar dated 30 September 1997 which was also acknowledged and signed by the Head of the Bayung Lencir Sub-District and the Head of Muara Merang Village.
- Receipt of compensation payment for 18 Ha of land in the name of Janto Kar dated 30 September 1997

Based on public consultation with previous landowner (from 16 samples of people determined by the auditor team, only 2 people were successfully interviewed) and village representatives Muara Merang Village and Mangsang Village, known that there was no customary right in or near the concession area of PT PWS. All land acquisition between local people and company representatives conducted as mutual agreement and with Bahasa that understood by all parties involved. The compensation process is done directed to the landowner and not diminish the legal/customary right; landowners are given the freedom to release their land without coercion.

<b>Status: Comply</b>
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**4.7**

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

**4.7.1**

The company has a procedure in place to identify people and/or community groups entitled to compensation presented in document SOP No 5 about Land Acquisition, revision 2 dated 3 June 2018. The procedure is described how to identify people and/or community groups entitled to compensation. Based on public consultation with village representatives from Muara Merang Village and Mangsang Village known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the landowner and landowners are given the freedom to release their land without coercion.

**4.7.2**

The company has procedure of Land Acquisition and Compensation, document SOP No 5 about Land Acquisition, revision 2 dated 3 June 2018. The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on public consultation with village representatives from Muara Merang Village and Mangsang Village known that they know about the procedure through the socialization given and they agree with the procedure, and they can access the procedure through management representative of the company if they need it.

**4.7.3**

The company can show recapitulation of previous landowners who have been compensated. Compensation is only made for the area within HGU areas owned by the company and was completed in 1997. The company has no expansion activities.

<b>Status: Comply</b>
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**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 and 4.8.4**

Based on public consultation with related government agencies of Musi Banyuasin District and village representatives (Muara Merang Village and Mangsang Village) known that there is no land dispute case for the last 1 years until this assessment conducted in the scope certification area.

#### **4.8.2**

Based on public consultation with related government agencies of Musi Banyuasin District and village representatives (Muara Merang Village and Mangsang Village) known that there is no land dispute case for the last 1 years until this assessment conducted in the scope certification area.

#### **4.8.3**

No evidence shows that there is any acquisition process through dispossession or forced abandonment. Based on public consultation with related government agencies of Musi Banyuasin District and village representatives from Muara Merang Village and Mangsang Village, known that all land acquisition between local people and company representatives conducted as mutual agreement and the compensation process are done directed to the landowner and not diminish the legal/customary right, landowners are given the freedom to release their land without coercion.

**Status: Comply**

### **PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION**

#### **5.1**

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

#### **5.1.1; 5.1.2; 5.1.3; 5.1.4; 5.1.5, 5.1.8**

Until the RSPO Initial Certification activity, known that the certification unit did not yet have cooperation with independent smallholders. However, the company already has 3rd party Independent FFB suppliers, namely KMS, KJMB, and Trans B1 and has informed them regarding the price of FFB through a Cooperation Contract.

Based on the results of the interviews, it is known that the arrangement of the contract has been made, the provisions for determining the price, the criteria for receiving the fruit, and the payment mechanism have been informed in the contract. So far, it is known that PT PWS has never made payments outside of the agreement.

As informed in work agreement between PT PWS and 3<sup>rd</sup> parties FFB Supplier, the price determination of FFB was determined based on the agreement between involved parties and were known as above the Local Regencies FFB Price determination.

#### **5.1.6**

The unit of certification has shown proof of payment as follows evidence of FFB Payment to KMS for the period 16 – 31 October 2022 which was paid on 3 November 2022 for a total of 67,040 Kg of FFB. The payment records contain completeness such as the extent of the work, minutes, to proof of payment via bank transfer. The contractor payment records already match with price determined and informed by company and contractor agreement.

Based on interview with FFB supplier such as Koperasi Makmur Sakti, it is known that there was not any late payment ever happen during periode of the contract.

#### **5.1.7**

Based on the results of the visit to the PWS Mill, it is known that there are two scales. The unit of certification can show calibration records for the two scales which were carried out by the Legal Metrology UPTD, the Department of Trade and Industry of the Musi Banyuasin District. The following are the results of the weighing test:

- Avery Weigh Tronix scales with serial number 201550436/50,000 Kg with a calibration date of 7 February 2022 and valid until February 2023.
- Avery Weigh Tronix scales with serial number 161756082/50,000 Kg with a calibration date of 7 February 2022

and valid until February 2023.

#### 5.1.9

The company has a mechanism for handling complaints from internal and external stakeholders in the Complaints Logbook and incoming and outgoing mail logbooks. The document describes the stages of receiving complaints, resolving complaints, including complaints related to products in the supply chain system.

Diagram of Request and Provision of Information, Communication and Submission of Complaints as follows:

Complaints reported by Stakeholders:

- Non-Confidential Information
  - Stakeholders directly to management and/or through RT/Foreman and/or through Labor Unions
  - Complaints are recorded in the complaint logbook; check whether the case is true or not and the results are communicated to the complainant; if it is not true, the report is rejected and if it is true, it will be followed up with an investigation
  - If it's a big case, investigate: involve the complainant and the reported party and/or mediator (if necessary)
  - Case completed: the results are communicated to the stakeholders concerned
  - Unresolved cases: use of Hotline & e-mail/ third parties (tripartite)
- Confidential information
  - Use of suggestion boxes, through gender committees, use of Hotlines & email
  - Complaints are recorded in the complaint logbook (secret), checked whether the case is true or not and the results are communicated to the complainant, if not true, the report is rejected and if true, proceed with investigation
  - True case: investigation: involve the complainant and the reported party and/or mediator (if necessary)
  - Case completed: results communicated to relevant Stakeholders
  - Unresolved cases: hotline & email/ third parties (tripartite)

The company then shows records of complaints from internal and external stakeholders along with complaint resolutions listed in the Logbook document of incoming and outgoing letters. The company shows examples of complaint resolution documents for the 2022 period. Based on information from representative management, it was informed that the PT PWS unit management take over was carried out in October 2021, so that all complaints recording at PT PWS during the 2021-month period had not been carried out.

Based on interviews with management, it is known that stakeholders have no complaints submitted to the company.

<b>Status: Comply</b>
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## 5.2

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

### 5.2.1; 5.2.2; 5.2.3

Based on the results of interviews with the local community, currently the company is preparing to develop a community estate but this has not been realized due to land availability constraints. Prospective Smallholders have been informed about RSPO certification informally, but because the plantations are not yet available, the program has not been realized.

The company already has 3rd party Independent FFB suppliers, namely KMS, KJMB, and Trans B1 and has informed them regarding the price of FFB through a Cooperation Contract.

### 5.2.4

The company conducted provide training on pesticide handling and the socialization to workers who work in smallholders' area such as on 21 July 2022. Based on an interview with management representative in Makmur Sakti cooperative (Independent Supplier) sighted they are understood procedures of pesticide application.

### 5.2.5

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

Based on interview with management representatives, and local communities also based on document verification as explained on 4.3.1 indicator, it is known that the realization of Plasma plantation has not been done, because of the local communities haven't been able to provide land that are legal to be managed and built as plasma estates.

**Status: Comply**

## **PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS**

### **6.1**

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

##### **6.1.1**

Unit of certification had a policy concerning the ethical codes in all operational activities and transactions. This policy is stated in the KLK Group Sustainability Policy updated on 30 August 2018 validated by CEO. This policy generally explained that the company seeks to prevent discrimination in the workplace, stated specifically as follows:

- The Group provides equal opportunities in work requirements by only providing the equal requirements, and seeking the ability and expertise of workers.
- Respect for diversity, and prevent discrimination against gender, race or ethnicity, and beliefs.

##### **6.1.2**

There were no foreign workers during this initial certification. UoC showed job vacancy announcements and work agreement letters between workers and company which showed that there was no payment requested during the recruitment process. In addition, in job vacancies that have been published by the company, there were no requirements that discriminated against gender, race or ethnicity, disability, sexual orientation, age, or belief.

Based on the interviews with the manpower agency, gender committee, labor unions, and workers (harvesters and mill operators) at PWS Mill, Pangkor Estate and Grik Estate, it is known that workers have never felt that the company has discriminated against them. It was explained that all activities from recruitment, performance appraisal, and promotion were given equal opportunity regardless of ethnicity, caste, nationality, religion, disability, gender, sexual orientation, gender identity, membership in labor unions, politics, or age. There was no difference in the communication between superiors and workers because of the things mentioned above, so the workers did not feel isolated or discriminated against by the superiors. The company also didn't request any payment during the recruitment process.

##### **6.1.3**

During the recruitment process, the company has set the standard of competence that is required based on the position offered. Selection had included evaluation of skills, performance and medical test results. Furthermore, promotions are conducted based on work period, annual evaluation results and availability of positions. All workers are treated equally in accordance with company regulations including the rights of the worker as well. Records on manpower procedures have been documented, as verified randomly to the several documents, here as follows:

- Recruitment of the Sustainable Grik Estate workforce with the initials "ARA" who joined on 25 August 2022 with a probationary period of 3 months, with documentation including: worker identity and complete job applications, initial health check data, Permanent Worker Agreement No. 1617/GM/PWS/VIII/2022 dated 25 August 2022, as well as proof of receipt of Work Agreement by employees.
- The company shows promotional records, for example the appointment of wholesale employees to Permanent Worker out of 5 harvesters it is known that 4 harvesters have passed based on the results of performance appraisal and attendance.

##### **6.1.4**

Based on field observation, interviews with the management and workers, it is known that there were no discriminatory in pregnancy testing given by the company. The pregnancy test conducted only to ensure that no pregnant workers in any agrochemical works such as pesticide application and fertilizing activities proven by there was no requirement regarding pregnancy test in recruitment SOP, job hiring announcement, and medical test during recruitment. All

pregnant workers placed in non-agrochemical works such as day care and housing area maintenance.

UoC also showed list of pregnant woman and breastfeeding mothers that showed all women placed in non-agrochemical works (housing area maintenance, day care officer, and office staff).

#### **6.1.5**

The company shows the Organizational Structure of the Gender Committee on May 14, 2022 which consists of the Coach, Chair, Deputy Chair, Secretary, the Sexual Violence & Harassment Division, the Education & Religion Sector, the Health & Welfare Sector, the Culture & Skills Sector, and the Male Gender Representative.

Based on the results of interviews with the chair of the gender committee, it was conveyed that the organization of the gender committee had just been formed and currently the focus is related to the socialization of the functions of the existence of the gender committee to all workers. Based on the results of interviews with female workers, it was conveyed that workers were aware of the existence of a gender committee and could briefly explain the function of the gender committee.

#### **6.1.6**

The company shows that the wage scale structure has been stipulated in Decree No. 1069/GM/PWS/VIII/2022 which was approved by the General Manager on September 26, 2022 which explains the number of benefits received by workers based on years of service ranging from groups 1 – 5 years to groups 35 – 40 years.

Companies can show workers' wage documents, for example the month and October 2022 it is known that the payment of workers' wages for that month is equivalent for the same scope of work. The following is an example of a wage document for October 2022, Employee Salary Slip Boilers initial's "B" and "M" has received the same payment.

Based on the results of interviews with St. Boiler Operator, stated that the basic wages received by workers are the same and are only differentiated by length of service benefits.

<b>Status: Comply</b>
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### **6.2**

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

#### **6.2.1**

Work requirements are in accordance with applicable labor regulations, one of which is contained in the Collective Labor Agreement for the 2021-2023 period which was ratified by the Head of the Manpower and Transmigration Office of Musi Banyuasin District on 24 May 2021.

The company showed the South Sumatera Governor's Decree Number 854/KPTS/DISNAKERTRANS/2021 concerning the 2022 Musi Banyuasin District Minimum Wage. The document explained that the 2022 Musi Banyuasin District Minimum Wage was Rp. 3,251,832,-

Companies can show wage documentation contained in the Salary Slip document, for example such as St.Boiler Operator's with initial "M", in October 2022, the wages received by workers are not planned to be more than the minimum wage. In addition, the document provides information on Basic Salary, Allowances received, overtime wages, deductions (BPJS and loans) and net salary.

Based on the results of interviews with workers at both the Mill and Estate, it was stated that workers had received detailed wage information each month and could briefly explain the information contained therein.

#### **6.2.2**

Work agreements and related documents detailing wages and working conditions, one of which is contained in the Collective Labor Agreement for the 2021-2023 period which was ratified by the Head of the Manpower and Transmigration Office of Musi Banyuasin District on 24 May 2021.

The company shows examples of working relationships between companies and workers, for example Work Agreement PKWTT Number 1728/GM/PWS/X/2022 dated 25 August 2022 for Transport Clerk Pasir Salak workers with the initials "AS" which contains information such as company identity, worker identity, position and scope of work, probation period, salary and facilities, company responsibility, employee discipline and disciplinary action. In addition, proof of receipt of a copy of the Work agreement by workers can be shown.

During the audit activities, the auditor team discovered several facts including:

- The results of interviews with harvest workers who were not working and the wives of workers in the Pangkor Estate OP99 housing, obtained information that the wives of workers who were not employees usually helped their husbands work as stragglers.
- Then, based on the results of field observations during harvesting activities at Pangkor Estate 2 Block W23, it was found that 1 worker was assisted by his wife (initial "F") who claimed not to be a company employee and 1 worker who was assisted by his parents (initial "M") who was also not an employee of the company. are employees of the company. Then, based on the document review, documentation of the working relationship between the company and family members who help workers in the field cannot yet be shown.
- Law of the Republic of Indonesia No. 13 of 2003 in article 50 and Government Regulation of the Republic of Indonesia No. 35 of 2021 in article 2 paragraph 1 states that employment relations occur because of an employment agreement between employers and workers/labourers.

Based on this evidence, there are still people who work in a corporate environment without having a work relationship in the form of a work agreement. This is not in accordance with Law No. 13 of 2003 and Government Regulation no. 35 years 2021. **Non-conformity No. 2022.01**

### 6.2.3

The company shows an example of an Overtime Warrant, for example for a member of security with the initials "HAM" on October 27 2022 for afternoon picket activities. Based on the results of interviews with workers both at the Mill and Estate, it was stated that in terms of the implementation of overtime work it had been agreed and there was no coercion. In addition, there were no complaints regarding the application of overtime hours and the payment of wages.

The company shows an example of a Salary Slip for example a St. The boiler has the initials "M" which informs the overtime wages paid. Based on the review of the worker's overtime documentation, it is concluded that the company has shown proof of overtime work on the willingness of workers and does not exceed the predetermined time limit

In addition, companies can show examples of granting leave, for example:

- Documentation of the application for Annual Leave for Pangkor 2 employees with the initials "RS" on the submission date of 12 November 2022 with a 2-day leave period, namely 14 and 15 November 2022.
- Documentation of requests for annual leave of Harvest Pasir Salak employees with the initials "S" with a 3-day leave period, namely 19-21 September 2022 with information on 15 days of 2022 leave entitlements and 3 days left.
- Certificate of Maternity Leave Number 003/SKCP/POL-PWS/03/2022 dated 24 March 2022 for the Pasir Salak Care Employee with the initials "E" with a leave period of 90 days, namely 24 March 2022 to 3 June 2022.

Based on the results of interviews with workers at both Mill and Estate, it was stated that the company has granted leave rights to employees with no deductions from wages.

### 6.2.4

Based on the results of field observations and document studies, it is known that the company has provided facilities for the welfare of both Estate and Mill employees, for example for estates as follows:

- **Pasir Salak Estate**

No	Facilities and infrastructure	Unit
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1	Executive Housing	22
2	Employee housing	357
3	Mosque	4
4	Volleyball court	4
5	Soccer field	2
6	Day care	3
7	Badminton court	2
8	ATM machine	1
9	Multipurpose building	1
10	Polyclinic	1
11	Primary school	2
12	Kindergarten	2
13	Water treatment	1

- Pangkor Estate**

No	Facilities and infrastructure	Unit
1	Executive Housing	0
2	Employee housing	340
3	Mosque	3
4	Volleyball court	3
5	Day care	6
6	Badminton court	1
7	Office	3

- Grik Estate**

No	Facilities and infrastructure	Unit
1	Executive Housing	22
2	Employee housing	357
3	Mosque	4
4	Volleyball court	4
5	Soccer field	2
6	day care	3
7	Badminton court	2
8	ATM machine	1
9	Multipurpose building	1
10	Polyclinic	1
11	Primary school	2
12	Kindergarten	2
13	Water treatment	1

The results of field observations and interview with worker, for example in the Grik Estate Blok M 11 housing complex, were found to be houses with damaged ceilings and sanitation facilities, which has been conveyed to the company, the

company showed the Continuous Improvement Plan document for 2022 – 2026, which was signed by the Senior Manager on October 1, 2022. The document contains, among other things:

Detail	Target	Descriptions
Construction of Employee Housing	2026	- Pasir Salak: 42 units - Pangkor 174 units - Grik 160 units
Employee Housing Improvements	2022/2023	All Estate
Residential Trench Repair	2022/2023	All Estate
Repair of broken residential toilets	2022/2023	All Estate
Production of WTP for clean water	2023/2024	All Estate

In addition, the company can show records of the progress of repairs to housing facilities that have been realized, such as identification of housing that requires repairs, documentation of purchases of goods for housing repair purposes and records of housing repairs.

Based on the explanation above, companies are encouraged to realize maintenance programs and provide employee welfare facilities and infrastructure, especially housing and sanitation facilities in accordance with the plans that have been prepared. **(OFI)**

#### 6.2.5

Based on the results of interviews with workers and field observations, it was found that the company has made efforts to provide workers with access to proper food by establishing an employee cooperative that provides basic needs. In addition, employee cooperatives also provide facilities in the form of taking goods in advance by paying through payroll deductions.

Access to proper food is also available at the surrounding village markets which can be reached by motorbikes. It was later found that several workers opened food stall businesses in residential areas.

#### 6.2.6

In Indonesia there were no living wage standard is established, so UoC still implemented the national minimum wages for all workers. In addition to the payment of minimum wages, certification unit has been conducting an assessment of the prevailing wages and in-kind benefits provided to workers in the certification unit aligned with the RSPO Guidance for Implementing a Decent Living Wage.

UoC has the determination of assessment prevailing wage and all kinds of benefit for DLW simulation in 2022 has been included in the calculation of housing facility cost, water cost, electricity cost, health cost, sport / entertainment cost, and day care cost, a number Rp 7,528,368. This calculation based on actual and rational price at certification unit location which is Musi Banyuasin District and provides to all worker.

#### 6.2.7

Based on the results of a review of the October 2022 workforce list documents and PKWT registration documents, it is known that workers with PKWT status are employed for maintenance activities. Meanwhile, permanent work (harvesting and processing FFB) is done by workers with PGHT status and Monthly Employees. So, it can be concluded that all work that is permanent in nature may not be carried out by Certain Time Workers (PKWT) or Casual Daily Workers.

<b>6.2.2</b>	<b>Status: Non-Conformity No. 2022.01 with Major Indicator</b>
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#### 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**

Unit of certification had a policy concerning the rights of workers to establish labor union. This policy is stated in the KLK Group Sustainability Policy updated on 30 August 2018 validated by CEO. This policy explained that KLK Group committed to respect and protect human rights including the rights of workers to freedom of association, collective bargaining, to form and join labor unions of their choice.

Based on the interviews with labor union representatives, it explained that the company had given freedom of association and labor unions have been formed. The establishment of the union was in accordance with the applicable laws and regulations and has been recorded in Manpower Agency of Musi Banyuasin District.

**6.3.2**

The company shows documents forming a labor union, including:

- Proof of Registration PK FSBSI (K) SBSI PT Pinang Witmas Sejati to the Head of the Manpower and Transmigration Office of Musi Banyuasin District in September 2021
- Proof of Registration of Serikat Pekerja Tingkat Perusahaan (SPTP) PT Pinang Witmas Sejati to Head of Manpower and Transmigration Office of Musi Banyuasin District in June 2020
- The company shows the Minutes of Change of Management of the Serikat Pekerja Tingkat Perusahaan (SPTP) Pinang Witmas Sejati PT PWS for the period 2022 – 2024 dated October 14, 2022 which has been acknowledged and signed by the Manpower and Transmigration Office of Musi Banyuasin District.

In addition, companies can show recordings of labor Union meetings, for example:

- Minutes of the SPTP member meeting held on November 23, 2022 which was attended by 28 participants, including discussions regarding the validity period of the PKB which will soon expire and recommendations for workers who are no longer able to work to go to the clinic for an early retirement recommendation.
- Minutes of Industrial Relations Dispute Settlement Negotiations dated 23 August 2022 between PT PWS and the SBSI Management regarding the awarding of bonuses for June 2022.

**6.3.3**

Based on interviews with representatives of trade unions, it was explained that the company had given freedom of association and there was no intervention in the unions that were formed.

<b>Status: Comply</b>
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**6.4**
**Children are not employed or exploited.**
**6.4.1**

UoC showed the human rights policy stated in the KLK Group Sustainability Policy updated on 30 August 2018 validated by CEO. This policy explained that the company committed to protect the children's rights by supporting the children's welfare and protecting children against exploitation, sexual harassment, human trafficking, and children worker.

UoC also had a SOP in recruitment No. SSOP 29 dated on 10 April 2019. It stated that the group prohibited to recruit employees under the age of 18 years old. UoC also showed the recruitment document in accordance with the recruitment requirements such as application letter of workers on behalf of ARF (initial), statement of police report, identity card (KTP), family identity card (KK) which stated that the worker is above the minimum age of worker.

**6.4.2; 6.4.3**

Based on document verification in list of workers in all units (September and October 2022) and also field observation, there were no underage workers.

**6.4.4**

As a form of outreach, the company has posted warnings regarding the prohibition of using underage children installed in several company areas including housing. In addition, socialization related to the prohibition of the use of child labor to third parties (contractors and suppliers), one of which is by including the prohibition of the use of child labor in contract clauses that are known and signed by the contractors and suppliers concerned.

	<b>Status: Comply</b>	
<b>6.5</b>		
<b>There is no harassment or abuse in the workplace, and reproductive rights are protected.</b>		
<b>6.5.1</b>		
<p>UoC showed the policy concerning on sexual harassment, violence, abuse, and reproductive rights stated in the KLG Group Sustainability Policy updated on 30 August 2018 validated by CEO. This policy explained that the company doesn't tolerate any forms of violence, intimidation, and harassment. In terms of that, this policy encourages the workers to report of all sexual harassment experienced by workers.</p> <p>In addition, UoC also had a SOP concerning on the procedure in handling sexual harassment No. SOP 27 dated on 10 August 2017. It stated about the mechanism for reporting any forms of violence or harassment from the common case to the severe case.</p> <p>Based on interviews with workers (harvesters, maintenance workers, and mill operators), disallowance of sexual harassment and violence had been routinely socialized by the management, and they had a good understanding in explaining the procedure of reporting any forms of sexual harassment and violence.</p>		
<b>6.5.2</b>		
<p>UoC also showed the record of the company's socialization using the poster posted in UoC's strategic spots. This poster explained the mechanism of all grievances including violence and sexual harassment. However, illiterate people can submit their complaints through the representative of internal stakeholder (gender committee and labor union).</p> <p>Based on the interviews with the gender committee and daycare officer, the company had time for breastfeeding woman and provided certain place for breastfeeding. In addition, based on field observations at the Pangkor Estate child care centre, it was found that 1 female worker took away her right to breastfeed her child.</p>		
<b>6.5.3</b>		
<p>UoC also showed the result of new mother's needs identification by showing the questionnaire on new mother's need, for example workers with initial "S" and "W". This document informed the needs of new mother as follows:</p> <ul style="list-style-type: none"> <li>• Counselling visits and baby care services after delivery</li> <li>• Lactation/breastfeeding rooms in offices, daycare and clinics</li> <li>• Giving time for breastfeeding and placing workers around housing, offices, clinics or land areas not far from breastfeeding places (until the child is 9 months old)</li> <li>• Children under 1 year old can be accepted at daycare</li> <li>• PAUD can accept students at the age of 2 years</li> <li>• Complementary food assistance for children under three years of age</li> <li>• And other suggestions from workers</li> </ul> <p>Based on the results of field observations, for example at the Pangkor Estate daycare it was found that there were lactation rooms and also female workers who took the time to breastfeed their children.</p>		
<b>6.5.4</b>		
<p>UoC showed the procedure in handling sexual harassment No. SOP 27 dated on 10 August 2017. It stated about the mechanism for reporting any forms of violence or harassment from the common case to the severe case. The procedure also described that if requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).</p> <p>Based on the interviews with workers it's known that the workers already have sufficient understanding of the grievance mechanism. Related complaints of sexual harassment can be submitted to the gender committee.</p>		
	<b>Status: Comply</b>	

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

Unit of certification had a policy concerning the ethical codes in all operational activities and transactions. This policy is stated in the KLK Group Sustainability Policy updated on 30 August 2018 validated by CEO. This policy generally explained that the group committed to provide workers and communities welfare by respecting and recognizing the rights in the workplace including respecting employee rights, no forced labor, no child labor, providing safe and healthy workplace, etc. UoC also committed to respecting the rights of indigenous and local communities and facilitating the inclusion of smallholders into the supply chain.

UoC also showed the SOP of workers management (No. SSOP 29) concerning on recruitment system validated on 10 April 2019 which stated that workers do not take any recruitment fees at any stage of the recruitment process, and no retention of passports/identity documents.

UoC showed that on each work agreement between the certification unit and the contractor/supplier, there were clauses related to fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the contractors. Some of these obligations are related to anti-bribery, anti-corruption, and anti-forced labor. To ensure compliance with these clauses, the certification unit always requests the requirements for the completeness before the contractor does work.

Based on the interviews with manpower agency, gender committee, labor union, and workers at Mill and Estates, it's known that workers have never felt discriminated and forced to work by the company. There were no significant obstacles related to employment or violations of company regulations. UoC provided output targets that can be obtained in less than 7 hours of work. If the harvester obtains more output within or more than 7 working hours, then the harvester will get the incentive payment. No penalty was given to the harvester if it does not get output due to natural factors such as rain. Based on payment list, the harvesters have earned above the minimum wage.

There were no pressure/forced in doing overtime work, workers who had overtime at the company can refuse if ordered to do overtime activities because overtime is not the worker's obligation. This statement proof by there was an overtime statement letter from the workers before doing overtime work.

**6.6.2**

Based on the results of a review of the labor list document, it is known that there is no use of foreign workers employed by PT PWS. UoC still have contract workers but there is no daily worker. Besides that, all the rights for all workers have been in accordance with the applicable law. Based on the interview with the contract workers, it's known that there was no recruitment fee during the recruitment process. The company already has procedures related to contract workers, one of which is contained in the PT PWS HRD Handbook which was approved by the General Manager of PT PWS on September 1, 2022.

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

The company shows the PT PWS OHS committee endorsement decree by the relevant agency in accordance with the OHS committee personnel, which is listed in the Manpower Office Decree dated 17 October 2022, with the organizational structure including the chairman on behalf of Junaidi, SP and the secretary on behalf of Khaidir, SH. The OHS committee Secretary has participated in the General OHS Expert Certification training from the Ministry of Manpower of the Republic of Indonesia which will be held in 2021 with OHS service company organizers. The company shows the Decree of the Minister of Manpower of the Republic of Indonesia No 5/18282/AS.02.04/XII/2021 concerning the Appointment of General OHS expert, dated December 31, 2021 valid for 3 years from the time it was stipulated.

**Periodic Meeting**

The company shows the recording of periodic meetings, for example the recording of the OHS committee meeting on 4 July 2022. The topics discussed briefly include: OHS (PPE, Safety Briefing, Motor Vehicles, Health Checks), Face shield trial reports, Annual stakeholder consultations with villages, Unsafe Action on fertilization activities, Hazardous waste processing, Child labor, and work accidents.

Thus, it can be concluded that the company already has an OHS organization with an adequate number of personnel in accordance with the laws and regulations.

#### **6.7.2**

##### **Emergency Response Procedure**

The company has SOP No. 24 Occupational Health and Safety and Emergency Response 2nd Revision dated 2 May 2020. The document briefly explains, among others:

- Occupational Health and Safety including: Work Accidents, OHS Committee, HIRARC, Training related to OHS, SIO, PPE, Health Checks, Pregnant & lactating women, LOTO, confined spaces, work permits, OHS Internal Audit, OHS review, and Force Majeure.
- Emergency Response, including: Emergency response equipment, Building fire emergency response, Chemical spill emergency response, Emergency response to natural disasters – floods.

The company has SSOP No. 33 Land Fire Emergency Response dated January 1, 2020. The document briefly explains the following: No burning policy, Firefighting team and job description, Firefighting equipment, Fire tower, Embankment/water source, Fire control, Training and simulation, Socialization, Documentation, Internal Audit and Review.

Based on the results of field observations of Best Practice activities at the Estate, it is known that for Best Practice activities in the field a first aid kit has been provided by the foreman. In addition, based on the results of the interview, it was found that the worker concerned could briefly explain the function of the first aid kit that was brought. During field observation in Mill and Estates, there is evacuation route and assembly point signs.

Based on interview with workers known that they have been known about the OHS policy, for example workers are required use PPE while working and safe working practices. They also said that Field Officer perform morning briefing every day before starting work and ensure the completeness of the PPE of all workers. Management have work program of occupational health safety every year. Realization of the program of work will be monitored through regular meetings Guiding Committee of Occupational Safety & Health every month. This work program applies generally to all workers in the workplace. If the plans have been made yet on target then will be evaluated in the management review to assess effectiveness.

Based on the results of field observations in the Estate and Mill areas, it is known that the company has installed first aid equipment, OHS symbols, has Fire Extinguisher, installed MSDS, and has Hydrant in strategic locations according to the level of danger. During the audit process the auditor team assessed that the first aid equipment accordance with Regulation of the Minister of Manpower and Transmigration Number. PER. 15/MEN/VIII/2008 concerning First Aid in work area. For example, on Fertilizer Storage Pasir Salak estate there are first aid equipment class A for < 25 workers.

Thus, it can be concluded that the company already has emergency response procedures that are understood by workers and that first aid workers are available in the field.

#### **6.7.3**

Based on the results of field visits such as operational activities at the Estate (Spraying, Harvesting, Fertilizing) and Mill (Processing Processes), it is known that workers have used adequate PPE and are in accordance with the hazard identification and risk control documents that have been determined. In addition, workers also stated that PPE is provided by the company and will be replaced if it is damaged or does not provide the maximum protection function included PPE with short lifetime such as rubber gloves and mask.

Based on the results of field visits and interviews with workers, it is known that the company has provided sanitation

facilities that can be used by workers to be able to remove PPE, clean themselves and put on their personal clothes.

So, it can be concluded that the company can show evidence that it has provided appropriate Personal Protective Equipment (PPE), and it is provided free of charge to all workers and sanitation facilities are available for workers who use pesticides so that workers can remove PPE, clean themselves and put on their personal clothes.

Based on the results of document verification and the results of interviews with workers, it can be concluded that sanitation facilities are appropriate according to the number of workers. Apart from that, the company is still progressing on the construction of employee facilities since the take offer was made by the KLK group.

#### 6.7.4

The company shows proof of BPJS Health and BPJS Employment payments, for example for October 2022 as follows:

- Proof of BPJS Health Payment for October 2022 on 10 November 2022 for a total of 1,620 participants
- Proof of Payment for BPJS Health Care Workers for October 2022 on November 10, 2022 for a total of 9 participants
- Proof of Payment for BPJS *Ketenagakerjaan* for October 2022 on 25 October 2022 for a total of 1,399 participants
- Proof of Payment for PKWT Employment BPJS October 2022 dated October 25, 2022 for a total of 330 participants
- Proof of Payment for Contract Employee Employment BPJS for the month of October 2022 on September 26, 2022 for a total of 16 participants

Based on the results of a study of labor list documents, for example in October 2022 it is known that the total workforce at PT PWS is 1,827 people. So, it was found that there was a difference between the number of workers and the number of BPJS participants with the following details:

Description	Workers
Total manpower	1,827
<b>BPJS Health Paid</b>	
Permanent/ Daily	1,620
Contract	9
<b>BPJS Employment Paid:</b>	
Permanent	1,399
Daily	330
Contract	16
<b>Difference BPJS Health</b>	<b>198</b>
<b>Difference BPJS Employment</b>	<b>82</b>

The results of interviews with company management representatives, it is known that the difference is due to several things, such as workers registered as Contribution Assistance Recipients, Personal Identity not yet online, Premium Arrears, Inactive due to duplicate data, still active in other companies, completeness of data. Regarding workers who have not been registered, monitoring documents can be shown, plans for registration in the following month and if a work accident occurs, the company will bear it.

Based on the evidence above, companies have opportunities for improvement by ensuring the process of registering workers into the BPJS Health and BPJS Employment programs. **(OFI)**

#### 6.7.5

The company has calculated the Lost Time Accident every month for monitoring the recording of occupational accidents. It shown the Lost Time Accident calculation per November 2022. This document informs the number of workers, number of working days, the number of non-effective working days, overtime, hours of work in total, the number of accidents, the number of working days lost, hours of work a year, the number of accidents a year, lost days

a year. Calculation of SR and FR is reviewed regularly and will be evaluated at monthly meeting of OHS Committee. In 2022 to dated 1 November 2022, no work accidents with fatality category. The summary FR and SR for each unit:

Unit	FR	SR
Mill	12.8	12.8
Pasir		
Salak	26.2	49.9
Pangkor	26.8	65.6
Grik	28.5	39.6

**Status: Comply**

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

### **7.1**

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

#### **7.1.1**

The company has shown the SOP document for OPT observation and control as stated in the Sustainability SSOP with the number SSOP.17. Integrated Pest Management and Control (IPM), which among others explains the following:

1. Major pests and diseases
2. Basics of integrated pest control and census criteria
3. Biological control
  - Planting useful plants
  - Owl
4. Cultural control
  - Planting cover crops
  - Manual control
  - Chopping and spreading of fallen trees
5. Chemical control is only carried out if the spread of destructive pests exceeds the threshold and uses approved pesticides.
6. Supervision
7. Census
8. Training.

The company shows the implementation of the Integrated Pest Management plan, for example as follows:

1. Beneficial Plant and Barn Owl Box  
The company shows documentation related to the application of biological pest control, for example:
  - The results of the field visit at the Estate found beneficial plants planted on the side of the road.
  - Checklist for monitoring the condition of owl cages at Pasir Salak Estate, Pangkor Estate, and Grik Estate.
2. Pest Census  
The company shows pest census records, for example the results of the Pangkor Estate rat attack census in March 2022 Division 2 for the 2008 planting year covering an area of 399 Ha, found 315 trees were attacked with a percentage of 5%. While for potential pests such as, base on sencus document period 2022 the document describes the results of the new attack census of *Oryctes rhinoceros* and fire caterpillar infestation below the economic threshold.

Based on the results of field visits and interviews on Grik Estate pest control activities, it is known that chemical pest control is based on the results of pest attack detection and census.

Thus, it can be concluded that the company has an IPM plan that is implemented and monitored to ensure effective pest control.

#### **7.1.2**

Based on the results of document review and field observations, it was found that the company had used *tyto alba* as a natural enemy of pests and beneficial plants including *turnera subulata* and *antigonon*. All of these species are not classified as invasive species according to the Minister of Environment and Forestry No. P.94/MENLHK/SETJEN/KUM.1/12/2016, so it can be concluded that there is no use of invasive species for pest control.

### 7.1.3

Based on interviews, document verification, and field observation also revealed that there was no pest control using fire. Pest and disease control in the company only uses biological and chemical means.

**Status: Comply**

## 7.2

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

### 7.2.1

Based on the results of a review of the pesticide use list document, for example in 2022, it is known that the company has used pesticides selectively to deal with targeted pests and weeds or diseases. The pesticides used for example as follows:

Brand	Active Ingredients	Permit Number	LD50	WHO	Target
Starlon	Triclopir	RI.01030120103757	>500	III	Broad-Leafed Weeds, Narrow-Leafed Weeds
Kenfosate	Glyphosate isopropylamine	RI.01030120103575	>500	III	Broad-Leafed Weeds, Narrow-Leafed Weeds
Basta	Ammonium Glufosinate	RI.01030120175826	>1,000	II	Broad-Leafed Weeds

### 7.2.2

The company shows a record of pesticide use contained in the Costing Book document for each unit, for example the use of Basta Pesticide for circle spraying activities at Grik Estate in July 2022 as follows:

- Active Ingredients: Ammonium Glufosinate (15%)
- LD50: >1,000
- Application Area: 139 Ha
- Active Ingredients/ Ha: 0.16 g/Ha
- Total Applications: 144 L

While on November 2022 Pangkor estate for pesticide Kenfosate (*Glyphosate isopropylamine*) concentration 363 g/lg, LD50(mg/kg) >500 is Application Area 156 Ha, Active Ingredients/ Ha: 0.11 g/Ha total application is 123 liters.

### 7.2.3

As part of reducing the use of pesticides, the company has integrated biological control in pest control, for example by using beneficial plants aimed at controlling Palm leaf eating caterpillar pests and *tyto alba* for controlling rat pests. Based on the results of field observations on Estate, it is known that the beneficial plant in a well-maintained condition and planted on the edge of the road.

The company shows data on the use of beneficial plans, for example on Pasir Salak estate species *Turnera subulata* January until November 2022 is 670 trees, *Antigonon leptopus* is 90 trees. Based on the results of field visits, for example at the Pangkor Estate and Grik Estate, it is known that the company has planted and taken care of plants such as *Turnera subulata* and *Antigonon leptopus* as a habitat for *Sycanus* sp. In addition, the company uses a pesticide rotation system so that pesticides and herbicides are not used continuously and will cause resistance.

### 7.2.4

Based on the results of document studies and interviews, it is known that the use of pesticides for animal pest control is based on the results of the pest attack census, for example the use of the Ratgone pesticide is based on pest census records, for example the results of the Pangkor Estate rat attack census in March 2022 Division 2, 2008 planting year covering an area of 399 Ha, found 315 affected trees with a percentage of 5%. So, it can be concluded that there is no preventive use of pesticides by the company.

**7.2.5**

Based on the results of the study of the list of pesticides used and field observations in the pesticide storage warehouse, it is known that the company does not use pesticides that are listed in the World Health Organization (WHO) Class 1A or 1B or included in the Stockholm or Rotterdam Conventions, as well as paraquat.

**7.2.6**

The company shows training records to personnel handling pesticides, for example Spray Equipment Maintenance Training at Grik Estate on February 25, 2022. In addition, based on interviews with spray workers, it was found that workers could briefly explain the safe working procedures for spraying activities.

Thus, it can be concluded that the company has shown evidence that the work using pesticides has been handled by trained workers.

**7.2.7**

The results of field observations of chemical storage warehouses, it is known that chemical storage warehouses are in accordance with Government Regulation number 74 of 2001 concerning the Management of Hazardous and Toxic Materials. Among them are equipped with hazard symbols, ventilation, adequate lighting, emergency response facilities and infrastructure, process flow for receiving and releasing chemicals, Material safety Data Sheets, storage of pesticides are grouped by type and available secondary containment which is clean. Meanwhile, for hazardous used packaging waste generated from Hazardous and Toxic Materials collected on hazardous temporary storage licensed by the government accordance with Investment Services and Integrated Services number-168 year 2022 dated 15 June 2020 valid 5 years.

**7.2.8**

The company has SOPs related to the management of solid, liquid and air waste which are listed in the SSOP document Number 23 concerning Management of hazardous and non- hazardous Wastes, and the 4th revision was carried out on May 2 2020. The SOP includes the management of the Hazardous material waste generated, including:

- Storage of hazardous waste is placed in a designated licensed hazardous waste warehouse.
- All hazardous waste stored in the division may only be stored for 1 week (7 days) maximum.
- All hazardous waste generated by housing must be submitted.
- It is not allowed to use used chemicals, oil and all kinds of things that are classified as hazardous waste in housing.

Based on the explanation above, it is known that the use of used chemical containers is only allowed to be used to accommodate washing water waste used from sacks of fertilizers and chemicals and is not allowed to be used as a water storage container or food and beverage container and toilets. In addition, assistants who use used chemical containers must keep records.

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

Based on the results of interviews with the PIC, it is known that there have been no cases of poisoning due to consumption of water that was stored using used chemical/pesticide containers.

**7.2.9**

Based on the results of interviews with management representatives, it is known that the company does not apply pesticides by air.

**7.2.10**

The company also conducts laboratory tests (thorax, audiometry, auto spirometry and cholinesterase) date June 6 2022 for workers working in high-risk areas and pesticide chemical handlers with 36 Grik estate employees, 34 Pasir Salak estate employees and 23 employees Pangkor estate.

The results of the general health examination of employees are in good health for work. Based on the results of interviews with pesticide application workers, information was obtained that all of them had been examined, there were no health problems and the auditor has verified the number of pesticide applicators based on the list of actual employees.

**7.2.11**

The company has a policy that prohibits pregnant and breast-feeding personnel working with chemical material. Based on interview with spraying personnel, it is known that there was neither pregnant nor breast-feeding female personnel who work with pesticide. Audit team also got information that the personnel have understood that female personnel cannot work with chemical material if they are pregnant or breast-feeding.

<b>Status: Comply</b>
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**7.3**

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

**7.3.1**

The company has SOPs related to the management of solid, liquid and airborne waste which are listed in the SSOP document No. 23 concerning Management of Hazardous Wastes and non-Hazardous Wastes, and the 4th revision was carried out on May 2 2020. The SOP covers the management of all waste generated, including:

- Hazardous waste
  - Storage of hazardous waste is placed in a designated licensed Hazardous waste warehouse.
  - Used Hazardous packaging must be stored separately in the Warehouse
  - Each Hazardous waste must be labelled & Hazardous waste Symbol
  - Collectors who have permits must provide information about the use of Hazardous waste.
  - All hazardous waste stored in the division may only be stored for 1 week (7 days) maximum.
  - All Hazardous waste generated by housing must be submitted.
  - It is not allowed to use used chemicals, oil and all kinds of things that are classified as Hazardous waste in housing.
- Non- Hazardous Waste (Domestic Waste)
  - Transportation of waste to TPSA at least once a week.
  - Waste disposal sites must be monitored/controlled using the warehouse checklist

Based on the explanation above, it is known that the use of used chemical containers is only allowed to be used to accommodate washing water waste used from sacks of fertilizers and chemicals and is not allowed to be used as a water storage container or food and beverage container and toilets. In addition, assistants who use used chemical containers must keep records.

However, based on the results of the field visit the following were found:

- There were used Hazardous waste containers (used pesticide jerry cans) in Grik Estate Block M11 Housing and in Pasir Salak Estate Housing in Km 12.
- There are lots of used chemical packaging (used jerry cans, used drums) placed on the 2nd Floor of the Pupuk Sentral Pasir Salak Estate Warehouse.
- There are several inappropriate domestic waste disposal points at Pasir Salak Estate KM 12 Housing, Pangkor Estate OP 99 Housing, Pangkor Estate OP 2007 Housing.

Based on the information above, it can be seen that there is still an implementation of waste management that is not in accordance with the procedures owned. This becomes **Non-conformity No. 2022.02 with minor category.**

**7.3.2**

Based on the results of interviews with managers and workers, it is known that the procedures for disposing of both Non-Hazardous Waste and Hazardous waste belonging to the company have been fully understood by workers and managers. However, based on the results of a field visit at the Pasir Salak Estate Km 12 housing, it was found that there was an implementation that was not in accordance with the procedures owned by the company. Related to this there has been a discrepancy in indicator 7.3.1.

Based on the information above, the sustainability party informed that this had become a discrepancy in the internal audit results of PT PWS for the period 22 – 26 August 2022, and had been included in the implementation monitoring program and routine outreach related to calls for managing waste in accordance with the procedures owned by the all workers.

**7.3.3**

Based on the results of interviews with managers and workers, it is known that the procedures for disposing of both Non-Hazardous and Hazardous waste belonging to the company have been fully understood by workers and managers. However, based on the results of a field visit at the Pasir Salak Estate Km 12 housing, it was found that there was an implementation that was not in accordance with the procedures owned by the company. Related to this there has been a discrepancy in indicator 7.3.1.

Based on the information above, the sustainability 9 party stated that this had become a discrepancy in the results of the internal audit of PT PWS for the period 22-26 August 2022, and had entered into the implementation monitoring program and routine outreach related to calls for managing waste in accordance with procedures owned by all worker.

The company has SOPs related to the management of solid, liquid and air waste as listed in the SSOP document No. 23 concerning hazardous and non-hazardous Waste Management, and the 4th revision was carried out on May 2 2020. The SOP explains that waste is not permitted to be burned. The company also has a KLK Sustainable Policy Document which among other things regulates the implementation of a strict No Burning Policy in all KLK Operations Activities.

Based on the explanation above, it is known that the use of used chemical containers is only allowed to be used to accommodate washing water waste used from sacks of fertilizers and chemicals and is not allowed to be used as a water storage container or food and beverage container and toilets. In addition, assistants who use used chemical containers must keep records.

Based on the results of the field visit, 2 burn marks were found at Pangkor Estate OP 99 Housing and 1 burn mark at Pangkor Estate OP 2007.

Based on the information above, there is still burning of household waste in several of these locations where this is not in accordance with the procedures and policies that are owned. This becomes **Non-conformity No. 2022.03 with minor category**.

<b>7.3.1</b>	<b>Status: Non-conformity No. 2022.02 with minor category</b>	
<b>7.3.3</b>	<b>Status: Non-conformity No. 2022.03 with minor category</b>	

**7.4**

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

**7.4.1**

The company shows procedures related to maintaining soil fertility, one of which is contained in the Sustainability Standard Operating Procedure (SSOP) document, SSOP 7. Seedling, Planting and Maintenance of Oil Palm Plants, revision 3 dated November 15, 2021. At point C. Maintenance of oil palm plantations, including explain about:

- Road Maintenance in Mature Plantation Areas.  
All roads are re-covered in the first year, preferably with laterite, the roads are levelled with a convexity suitable for the compactor, if no coating material is available, light grass is allowed to grow but is mowed periodically, the roads are provided with adequate surface and underground drainage.

- **Circle Treatment.**  
The planting area must always be free of weeds and debris to facilitate the removal of loose fruit and reduce the absorption of nutrients by weeds. Treatment is done by spraying the disc (3 times a year, with glyphosate herbicide 2 times and contact herbicide 1 time), scratching the disc (2 times a year, after sprouting).
- **Oil Palm Land Treatment and Ground Cover Development.**  
Weed control in Immature (spot spraying and weed eradication in circle); Eradication of Weeds in Mature (keeps the circle clean and makes picking loose fruit easier, keeping the weeds/ harvesting path with a lawn mower to improve accessibility); and Land Care Before Replanting (blocks to be replanted must be maintained until the last 1 year before felling for replanting).
- **Terrace/silt pit Maintenance.**  
The terraces/silt pit are maintained by lifting the landslides, returned to the terraces, with a rotation once a year. Silt pit is maintained by removing the soil mass that enters the silt pit. The beans that spread into the silt pit were moved towards the fort.
- **Maintenance of Drainage Ditches.**  
Lifting/digging the soil that covers the trench, so that the size of the trench remains the same as before, is carried out 2 times a year.
- **Maintenance of Water Level.**  
Maintenance of water level for existing plants in peat areas, the water level should be maintained at an average limit of 60 cm from the soil surface (range 50-75cm), through a network of water control structures, such as water embankments, sand bags, and etc.
- **Fertilization Based on Soil and Leaf Analysis Results.**  
Factors that need to be considered in determining the report are (soil, climate, results of fertilization research, plant age, plant productivity, realization of fertilization twice a year, results of leaf and soil nutrient analysis, and results of visual observations in the field).

Based on the results of document studies and field observations, it was found that several implementations that have been carried out by companies such as companies have applied POME and used pruned midrib as an alternative nutrient source.

#### 7.4.2

The company shows the recorded leaf and soil analysis results contained in the Oil Palm Manuring Recommendation 2021 – 2022 document for each Estate by PT Applied Agriculture Resource Indonesia. The parameters analysed include:

- Leaves: N, P, K Ca, Mg, B, Cu, Ca dan Zn.
- Soil: pH, C-Organic, P, K, Ca, Mg, C.E.C.

#### 7.4.3

The company shows a nutrient recycling strategy such as the Empty Fruit Bunch application and POME, for example the period January – November 2022 as follows:

- POME to land application for nutrient strategies: 86,432 M3
- EFB to land application for organic fertilizer: 12,158 Tons.

Based on the results of document verification and interviews with company representative it is known that the dose per plant is 50 kg per tree.

#### 7.4.4

The company shows a record of the fertilization plan and realization for each estate, for example for the financial year period October 2021 – November 2022 recommended and applied fertilizers include NK (17:30), Borate, Kieserite, Opcom, and Fertibor. For example, in Griik estate dan Pangkor Estate with the following details:

Unit	Plan (Kg)	Realization (Kg)	Achievement
Griik estate Division 2	799.36	579.19	63%

Pangkor estate Division 2	3,639.30	2,731.90	70%
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The realization of fertilizers applied in accordance with the recommendations and their achievements in several units is still not 100% because the financial year is still running. In addition, the company also utilizes organic mass a solid waste generated by POM i.e POME and EFB for land application as explained in indicator 7.4.3.

	Status: Comply	
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**7.5**  
**Practices minimise and control erosion and degradation of soils.**

**7.5.1**  
The company shows maps that inform the distribution of soil types and slope levels made by PT AAR Indonesia year 2022, including:

- Pangkor Estate:
  - Slope Map Scale 1 : 45.000 with slopes between 0 – 8%.
  - Land Unit Map Scale 1 : 75.000 with soil groups including: *hemic haplosaprist Haplosaprist and hydrandepts*.
- Pasir Salak Estate:
  - Slope Map Scale 1 : 25.000 with slopes between 0 – 8%.
  - Land Unit Map Scale 1 : 50.000 with soil groups including: *eutrandepts, tropofluvents, tropoquepts, hydrandepts, dystrandepts, tropoquepts, eutropepts*.
- Grik Estate:
  - Slope Map Scale 1 : 50.000 with slopes between 0 – 8%.
  - Land Unit Map Scale 1 : 75.000 with soil groups including: *dystropepts, kandiudults, tropaquepts, eutropepts*.

Based on the study of documents and field observations, it is known that there is no marginal soil with a peat type and an area with a slope of >40%.

**7.5.2**  
Based on the results of the study of the Slope Map document, it is known that there are no areas with a slope of >40%, in addition, based on field observations, for example in the Replanting Year 2022 Block G12 and G23 Pangkor Estate area, no extensive replanting activities were found in areas with steep slopes.

**7.5.3**  
Based on the results of document review and field visits, it was found that the company did not carry out new plantings and only carried out replanting activities. The planting area in 2022 are replanting area. based on documents verification and field visits in block G12 and G23 it (Pangkor estate) was known the planting are in accordance with company provedure in example planting on flat area, not in marginal or fragile area.

	Status: Comply	
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**7.6**  
**Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.**

**7.6.1**  
The company shows maps that inform the distribution of soil types and slope levels made by PT AAR Indonesia year 2022, including:

- Pangkor Estate:
  - Slope Map Scale 1 : 45.000 with slopes between 0 – 8%.
  - Land Unit Map Scale 1 : 75.000 with soil groups including: *hemic haplosaprist Haplosaprist and hydrandepts*.
- Pasir Salak Estate:
  - Slope Map Scale 1 : 25.000 with slopes between 0 – 8%.
  - Land Unit Map Scale 1 : 50.000 with soil groups including: *eutrandepts, tropofluvents, tropoquepts, hydrandepts, dystrandepts, tropoquepts, eutropepts*.
- Grik Estate:
  - Slope Map Scale 1 : 50.000 with slopes between 0 – 8%.

- Land Unit Map Scale 1 : 75.000 with soil groups including: dystropepts, kandiodults, tropaquepts, eutropepts.

The maps above also provide information regarding drainage conditions and the general condition of the survey area. The planting area in 2022 are replanting area. based on documents verification and field visits in block G12 and G23 it (Pangkor estate) was known the planting are in accordance with company provedure in example planting on flat area, not in marginal or fragile area.

### 7.6.2

Based on documents review of area statement, field visits at Pangkor Estate, Pasir Salak Estate and Grik Estate, it is known that the company did not expand of the operational area and there is no more land clearing activity. The Company only doing the replanting activities since 2022. Based on documents verification and field visits in block G12 and G23 it (Pangkor estate) was known the planting are in accordance with company procedure in example planting on flat area, not in marginal or fragile area.

### 7.6.3

Based on the results of the study of area statement documents, information maps, interviews with company management and the results of field visits to each estate, it was found that there were no new planting activities in the areas managed by the company.

The planting area in 2022 are replanting area. based on documents verification and field visits in block G12 and G23 it (Pangkor estate) was known the planting are in accordance with company procedure and the last soil surveys result.

<b>Status: Comply</b>
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## 7.7

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

### 7.7.1

Based on the information from interviews and verification of the management unit documents that the area statement in 2022 it is known that the planting year on PT PWS conducted during 1996 until 2008, and above planting year 2008 is replanting on Pangkor estate just on mineral land is 286,8 Ha. PT Pinang Witmas no conducted new planting above November 15, 2018.

### 7.7.2

The company shows the peat inventory reporting data for PT PWS to the RSPO on 19 May 2022 including the Shapefile and a statement of PT PWS Estate 's area. The peat inventory report refers to the RSPO Peat Inventory guide template. Based on the peat inventory report, the area of peat in the core area is 828.97 ha on Pangkor Estate.

### 7.7.3

PT PWS carries out water management activities, which refer to procedure no. SSOP 07 tanggal revised 15 November 2021 regarding the management of peat areas to reduce the rate of subsidence of peat soils. The procedure states that the company must manage and monitor the peat water level, by recording and monitoring the water level, the groundwater level read through the piezometer and subsidence pile reduction. Measurement of water level and ground water level is carried out every day, while land subsidence is carried out once a year.

This procedure refers to the RSPO manual on BMP for existing Oil Palm Cultivation on Peat. Explanation of peat management efforts such as:

- Making a dam (sand bag) by arranging sacks filled with soil so that the water level can be adjusted at 50 -70 cm.
- Installation of water level boards in each dam in the Estate ditch to maintain the water level in the ditch (collection drain) the water level is maintained between 50-70 cm.
- Monitoring the peat water level using a piezometer with a minimum ratio of 1:120 Ha, maintaining a water level of 50 cm (between 40-60 cm).
- Install subsidence stakes and take measurements every year, with the installation of measuring stakes. There is a minimum of one (1) subsidence pole in every 240 ha of peatland areas planted with oil palm.

- Drainability assessment is conducted according to RSPO Drainability Assessment Procedure prior to replanting (procedure the last review), and its summary is submitted to RSPO Secretariat.
- The company have the fire prevention and control plan is available, adequately covers both fire prevention and control.

Based on the results of document verification The peat inventory report referring to the RSPO Peat Inventory guide template has been submitted to the RSPO on 19 May 2022, the total peatland in PT PWS is 828.97 ha. Based on the verification results of the peat distribution map document, information was obtained that the company has 7 piezometer units, 6 subsidence pole measuring units, 7 water units and 17 watergates. Monitoring of subsidence is carried out at 6 monitoring points namely in blocks G14, G17, W8, W11, U4 and U7. Measurement of subsidence stakes is carried out every year, during the audit the initial subsidence stakes were installed in 7 March 2022 and will be in the coming year.

Based on the results of field visits at the Pangkor estate, information was obtained that the company had installed subsidence stakes in accordance with the provisions in the RSPO manual on BMP for existing Oil Palm Cultivation on Peat, for example subsidence stakes in blocks G14 and G17.

#### **7.7.4**

The company shows the following documents related to regulating groundwater levels to inhibit carbon emissions from peatlands as follows:

- Monitoring of subsidence is carried out at 6 monitoring points namely in blocks G14, G17, W8, W11, U4 and U7. Measurement of subsidence stakes is carried out every year, during the audit the initial subsidence stakes were installed in March 2022 and will be in the coming year.
- Monitoring the water level for the 2022 period on block G 13, G17, G27, W11, W8, W24 and U5 it is known that the water level height in the period March – November 2022 average water level is 53.65 cm.
- Monitoring the piezometer 2022 period on block G 13, G17, G27, W11, W8, W24 and U5 it is known that the water level height in the period March – November 2022 average water level is 60.00 cm.
- Based on the results of document verification and field visits, it is known that the company has 7 water level units and 12 water gate units.

Based on field visits on subsidence pole it is known that the company has taken measurements using subsidence stakes. Stakes have been restricted by using fences and are not treated with the aim of decreasing peat soils naturally occurring / no disturbance. At the time of the visit, land subsidence from the initial installation was carried out in 7 March 2022.

#### **7.7.5**

The company has peat inventory reporting data for PT PWS to the RSPO on 19 May 2022 including the Shapefile and a statement of PT PWS Estate 's area has explained on indicator 7.7.2. Based on the peat inventory report, the area of peat in the core area is 828.97 ha on Pangkor Estate. Replanting in 2022 on Pangkor estate covering an area of 257.5 Ha will be carried out in a mineral area. The company shows a map of the replanting plan until 2027, based on the map, replanting will be carried out in the Pangkor estate, but only in the mineral area, not in the peat area. The company has not determined a plan for replanting activities in the peat area prior to issuing the Drainability assessment and reporting it to the RSPO, while the audit is taking place the company is still determining the Drainability assessment activity plan to be carried out by the research team. Based on the results of a field visit to the Pangkor estate, namely the peat area and the replanting area, it can be concluded that the company has not carried out replanting activities in areas identified as peatlands as described in the peat inventory report until the Drainability assessment report has been sent to the RSPO.

#### **7.7.6**

Peatland management is in accordance with the procedure referring to the RSPO manual on BMP for existing Oil Palm Cultivation on Peat. Explanation of peat management efforts such as:

- Monitoring of subsidence is carried out at 6 monitoring points namely in blocks G14, G17, W8, W11, U4 and U7. Measurement of subsidence stakes is carried out every year, during the audit the initial subsidence stakes were

installed in March 2022 and will be in the coming year.

- Monitoring the water level for the 2022 period on block G 13, G17, G27, W11, W8, W24 and U5 it is known that the water level height in the period March – November 2022 average water level is 53.65 cm.
- Monitoring the piezometer 2022 period on block G 13, G17, G27, W11, W8, W24 and U5 it is known that the water level height in the period March – November 2022 average water level is 60.00 cm.
- Based on the results of document verification and field visits, it is known that the company has 7 water level units and 12 water gate units.

Fire prevention and control plan is available on report on efforts to prevent, control and control fire hazards to the Plantation and Livestock Service Office of the Musi Banyuasin District on 1 July 2022. The company also routinely monitors land fires, based on monitoring results from January to November 2022 it is known that there are no land fires in the company's operational areas including peat areas. The company also has 9 units of fire monitoring towers and specific land fire extinguishing equipment in peat areas.

- The company shows the technical procedures related to planting on peat land which are contained in document Number SSOP 07 revised date of 15 November 2021 concerning Seeding, Planting and Maintenance of Oil Palm Plants. The procedure has outlined the techniques for planting on peatlands such as determining the spacing, making the planting holes, applying fertilizer to the planting holes and so on.

Based on the results of field visits at the Pangkor estate, information was obtained that the company had installed subsidence stakes in accordance with the provisions in the RSPO manual on BMP for existing Oil Palm Cultivation on Peat, for example subsidence stakes in blocks G14 and G17.

#### 7.7.7

Based on the results of document verification, area statements, HCV identification documents, peat distribution maps and peat inventories, it can be concluded that there are no peat areas functioning as conservation function areas (HCV). Based on the results of field visits during the audit conducted, all peat areas identified in the peat inventory were peat areas as a function of palm oil cultivation, there were no peat areas identified as HCV areas.

**Status: Comply**

### 7.8

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

##### 7.8.1

The company has SOPs for identification, management and maintenance of water sources and quality listed in SOP 16. Quality of Underground and Surface Water Rev.03 effective date of 15 January 2020. The SOP explains what describes efforts to protect water sources, the supply of water sources can sustainability, water use efficiency, renewable water sources, rainwater collection, pollution monitoring, water quality and reporting. Types of efforts to maintain water sources include:

- Identification of water sources; Mill Reservoir (Surface Water), Estate Water Reservoir (Surface Water), and Drilled Well (Underground Water)
- Management of water sources by establishing boundaries of at least 50 m (according to HCV recommendations), 10 m buffer zone for water catchment areas, all water sources are given identification, warning signs and mapped.
- Maintenance of water sources through riparian (river) demarcation and creating a 10 m buffer zone around the catchment area, prohibition of spraying and fertilizing as well as socialization, periodic analysis of water quality, and a distance of at least 1000 m from housing and other activities that could contaminate water sources.

In addition to the SOP above, the Unit of Certification also has procedures for management and maintenance of water sources and quality contained in SSOP 22. Identification, Management and Monitoring of Conservation Areas and Flora & Fauna, 3rd revision issued on 5 November 2020. These procedures include contains the following points related to the identification, management and measurement of water quality:

- In point A.2.2, procedures are described for identifying the type of water source, measuring discharge from water sources, identifying river morphology, determining river types, assessing river quality, estimating flood/slide/ecological and safety impacts.
- In point B.1, it describes the procedure for establishing riparian areas along the river following the recommendations in the HCV report or following the limits set by the government or regulations, placing warning

signs in the area.

- In point B.3, it describes procedures for not spraying and fertilizing and burning around the riparian area, training for workers including spraying and fertilizing, riparian areas may not be worked on, conducting socialization on conservation areas

To ensure that the supply of water sources can be sustainable, efforts are being made

- Construction of a water dam (reservoir) that has a spillway to monitor the water level/level. The level (height of the spillway) is determined to ensure that there is enough water for the people downstream
- Ensure that the use and management of water in operations will not negatively impact other users within the same catchment area, including local communities and water users in general;
- Ensuring that local communities, workers and their families have sufficient access to clean water for drinking water use and Bathing, Washing, Latrine.

Based on the explanation above, it can be concluded that the company already has SOPs for identifying, managing and maintaining water sources and quality and has available maps of water bodies that are quite informative and in accordance with actual conditions in the field.

### **7.8.2**

The Certification Unit already has a water management plan and has implemented the water management plan which consists of:

- Inventory of location and area and mapped according to the stipulated size of river boundaries
- Marking the riparian area by putting red paint on the palm stems which are the boundaries of oil palm plantations where plantation activities are not permitted
- Carry out planting and enrichment of vegetation
- Do not apply chemicals in the riparian area.
- Not disposing of liquid waste into rivers but reusing it on plantation land. Before being used, liquid waste is first managed at the WWTP so that its quality meets the standards set by the government.
- Utilizing water for factory processing in accordance with the standards set by the company.
- Conduct river water quality testing

In addition, the company has a river bank management plan for the 2021-2022 period, which includes:

- River border patrols and monitoring
- Signboard maintenance
- Enrichment of local trees
- River water quality testing
- Biodiversity inventory
- Socialization of river border management

In addition to implementing water resource management, the company is known to have regularly monitored water quality through water quality testing at an accredited laboratory. All of these tests are carried out by an accredited laboratory (KAN-No. LP-832-IDN) every 6 months. Tests were carried out with several aspects, namely physics, inorganic chemistry, organic chemistry and microbiology.

Based on field observation, it is known that Certification unit has managed the riparian by installing signboards as HCV areas and painting palm trees crop as spray boundary signs. For several HCV locations in the form of riparian, succession has been seen with the natural growth of local plants.

Based on the verification of the test result documents, it can be concluded that there are no test result values that are not in accordance with the quality standard used, namely class II water quality standard Government Regulation No. 22 of 2021 Appendix VI concerning national water quality standards. In addition, the company has also implemented management and maintenance of water sources and quality in accordance with its SOPs. The results of interviews with Grik Estate spray workers, it is known that the workers already know that the application of chemicals is prohibited in

the riparian area.

### 7.8.3

The company already has a Liquid Waste Utilization Permit for Land Application (LA) based on the Decree of the Head of the Investment and One-Stop Service Office of Musi Banyuasin District Number 167 of 2020 concerning Extension of Permits for Utilizing Wastewater from the Palm Oil Industry on Land in Oil Palm Plantations (Land Application) PT Pinang Witmas Sejati which is located in Mangsang Village, Bayung Lencir District, Musi Banyuasin District Sumatera Selatan Province on June 25 2020. The permit is valid for 3 years from the date of stipulation. Permit Liquid waste is used to irrigate 320 hectares of plantation land in block F.

Monitoring the quality of wastewater at the outlet shows that the parameters monitored still meet environmental quality standards. This shows that the liquid waste generated from FFB management activities at the Pinang Witmas Sejati Factory is suitable for use in Land Applications.

Based on the results of interviews with the Environmental Service regarding the management of liquid waste at the WWTP, there were no issues related to environmental pollution. The results of interviews with the community from the villages around the company also stated that there was no pollution from the liquid waste produced by the company. Based on this explanation, it can be concluded that the company has met the quality standards for waste water that is disposed of and/or used according to the quality standards for waste water for disposal and/or utilization and does not cause pollution to the environment.

### 7.8.4

The Unit of Certification already has a Surface Water Use/Utilization Permit which has been extended through the document Decree of the Head of Investment Service and One Stop Integrated Services of Sumatera Selatan Province Number: 0192/DPMPSTSP.V/IV/2021 concerning Extension of the Two Letters of Taking Permits and Utilization of Water Surface (SIPPA-AIR) To PT. Pinang Witmas Sejati in Musi Banyuasin District The permit decision takes effect from April 12 2021 to April 12 2023. It is explained in the document that the company has an obligation to take water from an approved source, namely the Lalan River.

#### Water Usage Data

The data on water use for FFB processing in OPMs and Use for Domestic Water Needs for the last 12 months are summarized as follows:

- Data on water use for FFB processing for the last 12 months: January 2021 to December 2021.
- Average Use of Water/ton FFB for the last 12 months: 2.0 m<sup>3</sup>/Ton FFB
- The highest FFB Processed Data for the last 12 months was 31,360.721 tons in September 2021 while the lowest processed FFB was 24,552.015 tons in July 2022
- The highest water use data is 74,666 m<sup>3</sup> in January 2021 while the lowest water use data is in June 2021 of 43,266 m<sup>3</sup>
- Based on the data above, there is no data that exceeds the water use budget that has been determined by the company.

Based on the explanation above, the company already has water usage documents for palm oil processing units along with supporting documents in the form of Surface Water Use Permit Documents, recapitulation of water use, and proof of payment of fees for surface water use.

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

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

#### 7.9.1

The certification unit has increased the efficiency of using fossil fuels and optimizing renewable energy by using of shells and fiber as boiler fuel for turbine generators. The use of energy generated from the turbine is monitored every day. Certificate unit has shown records of the use of shells and fiber as renewable energy and the use of diesel as a fossil fuel for the period October 2021-October 2022.

Based on data for the period October 2021 – October 2022 it is known that the Certification Unit uses 98% renewable energy or 0.18 MWH/Ton CPO.

**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

The company did not add new areas (still the same as the previous year), The company also has conducted GHG emission calculations period 2021 use of Calculator Palm GHG version 4.0. Accurate data has been put into the RSPO PalmGHG Calculator (Palm GHG version 4.0) and has been verified. Summary of net GHG emissions from PalmGHG calculator of the audit report which calculation option is applied "Apply full Version".

Summary of Net GHG Emissions

Emissions per product	tCO2e/tProduct
CPO	1.85
PK	1.85

Production	t/yr
FFB processed	304,979.00
CPO produced	58,588
PK produced	16,394

Extraction	%
OER	19.21
KER	5.38

Land use	Ha
Planted area on mineral	13282.27
Planted on peat	828.83
Total area planted	14111.10
Conservation Area (Forested)	94.50
Conservation Area (Non-Forested)	0.00
FFB Production per hectare	21.61

Summary of field emission and Sinks

Description	Own crop		Group		3rd	Total
Emissions Sources	tCO2e	tCO2e/tFFB	tCO2e	tCO2e/tFFB	tCO2e	
Land conversion	129926.06	0.47	0.00	0.00	0.00	129926.06
CO2 emissions from fertilizer	6808.24	0.02	0.00	0.00	0.00	6808.24
NO2 emissions from peat	6204.42	0.02	0.00	0.00	0.00	6204.42
NO2 from Fertilizer	6650.86	0.02	0.00	0.00	0.00	6650.86
Fuel consumption	1165.02	0.00	0.00	0.00	0.00	1165.02
Peat oxidation	45254.11	0.17	0.00	0.00	0.00	45254.11
Sinks					0.00	
Crop sequestration	-95162.96	-0.35	0.00	0.00	0.00	-95162.96
Sequestration in Conservation area	-866.56	-0.00	0.00	0.00	0.00	-866.56

<b>Total</b>	<b>99979.20</b>	<b>0.37</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>99979.20</b>
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**Summary Oil Mill Emissions and Credits**

<b>Remarks</b>	<b>tCO<sub>2</sub>e</b>	<b>tCO<sub>2</sub>e/t FFB</b>
Emissions sources		
POME	26813.85	0.09
Fuel consumption	275.10	0.00
Grid electricity	0.00	0.00
Credits		
Export of grid electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>27088.95</b>	<b>0.09</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

The auditor team has verified the palm GHG carried out by the company. Based on the results of the verification, it is known that the palm GHG input data is in accordance with the actual conditions.

**7.10.2**

Based on the results of document review, field visits and interviews, it is known that there was no land clearing after 2014. So this indicator is not applicable.

**7.10.3**

The company has an inventory of GHG emission sources listed in the 2021 greenhouse gas emission source identification documents, including:

Sources of GHG emissions produced by Estate	Sources of GHG emissions produced by Mill
<ul style="list-style-type: none"> <li>• GHG from Fertilizer N</li> <li>• GHG from Fertilizer P<sub>2</sub>O<sub>5</sub></li> <li>• GHG from Fertilizer MgO</li> <li>• GHG from Fertilizer K<sub>2</sub>O</li> <li>• GHG from Fertilizer CaO</li> <li>• GHG from Fertilizer Borate</li> <li>• GHG from Fertilizer ZnSO<sub>4</sub></li> <li>• GHG from Fertilizer CuSO<sub>4</sub></li> <li>• GHG from Fertilizer MgSO<sub>4</sub></li> <li>• GHG from Fertilizer CaCO<sub>3</sub></li> <li>• CO<sub>2</sub> from Herbicide, and Pesticide</li> <li>• CO<sub>2</sub> from diesel usage in Estates</li> <li>• CO<sub>2</sub> from grid</li> <li>• CO<sub>2</sub> from diesel usage for Transport to POM</li> <li>• CO<sub>2</sub> from planting in Peat Area</li> </ul>	<ul style="list-style-type: none"> <li>• CO<sub>2</sub> from energy production</li> <li>• CO<sub>2</sub> fossil from electricity</li> <li>• CO<sub>2</sub> fossil from diesel consumption</li> <li>• CH<sub>4</sub> from POME utilization</li> <li>• CO<sub>2</sub> from usage of NaOH</li> <li>• CO<sub>2</sub> form usage of Fosfat</li> <li>• CO<sub>2</sub> form usage of EDTA</li> <li>• CO<sub>2</sub> form usage of Sulfit</li> <li>• CO<sub>2</sub> form usage of alum</li> <li>• CO<sub>2</sub> form usage of Sodium karbonat</li> <li>• CO<sub>2</sub> form usage of CaCO<sub>3</sub></li> <li>• CO<sub>2</sub> form diesel usage of CPO Transport</li> </ul>

The emission sources that the company has inventoried cover all activities in PT PWS. Based on the above information,

it can be concluded that the company has conducted an inventory of GHG emission sources within its operational scope.

The sources of pollution and emissions for the estate are listed on the identification documents and management plans for pollution sources for the period 2021, such as emissions (CO<sub>2</sub>, CO), noise, chemical waste, organic and inorganic waste, and infectious waste.

Plans to reduce or minimize have been implemented and monitored as explained in RKL-RPL semester II 2021 and Semester I 2022. According to RKL-RPL report, the company conducted routine environmental quality test regularly once in three to six months for the following parameters:

- Wastewater quality testing
- Ambient air quality testing
- Air quality testing (generator, boiler, transportation)
- Noise (machinery) testing
- River water quality testing (biological/plankton/bentos, chemical compounds)

From all the quality testing that has been conducted as explained above by the company with help from third party (in this case, accredited laboratory), it is known that the results of the test were still in accordance with the applicable standards.

Based on the explanation above, it is known that the company has identified significant pollutants and implemented reduce and minimize action use while monitored the results of quality testing of certain parameters as listed in the RKL-RPL document.

**Status: Comply**

#### 7.11

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

##### 7.11.1

The unit of certification will not clear new land but will replant it in 2022, by mechanical method, not by burning. This is evidenced by the Minutes of Equipment Preparation for replanting on August 27, 2022. The Company Unit has conducted a review of replanting activities through a replanting environmental impact analysis document, and has also included this impact in the fire control and prevention management report. Report on Efforts to Prevent and Mitigate and Control Estate and Factory Fire Hazards for the Period Jan – Jun 2022 Mangsang Village, District, Bayung Lencir, Banyuasin Regency, Sumatera Selatan 2022. In the document it is informed that the company carried out the PLTB method for land preparation before replanting, namely Land Preparation Zero Burning is in accordance with KLK's Sustainability Policy point 1.3 which includes the Zero Burning Policy.

##### 7.11.2

As explained in indicator 7.11.1, it is known that the company already has a policy related to burning, namely the KLK Sustainability Policy which explains Zero Burning in any form of operational activity. The company is known to have fire control measures in accordance with applicable laws and regulations, and has fire control teams specifically for plantations and factories.

Based on the results of a field visit to the Fire Tower at Pasir Salak Estate, it is known that the Fire Tower is in good condition and is functioning properly. It is also known that in the last 1 year there has never been a case of land fires that occurred around the PT PWS Operational area.

##### 7.11.3

The Unit of Certification has engaged stakeholders in adjacent locations for Fire prevention and control measures. The form of this involvement is in carrying out Simulations, Training and Involving Fire Care Communities:

- Fire simulation January, 17 2022 for the Fire fighter team consist of 2 Team (Team 1, Team 2 and Team 3/Zone 1

- of 24 people) + 2 supervisors,
- Fire Fighting Simulation 17 January 2022, PT PWS participated by 26 people from worker
- Simulation 11 July 2022, PT PWS participated by 30 people from worker
- Training Simulation and Simulation of Land Fire Extinguishers, 11 July 2022, participated by 17 people from worker and fire fighter group
- Training 22 December 2021 PT PWS for Muara Merang Village participated by 5 people from MPA, and 5 people from Mangsang Village MPA, with total of participant reach to 35 people from surroundings communities and worker.

**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

Based on interview results, with management representatives it is known that there was new planting in 2005 and above, so that unit certification send the LUCA documents to RSPO secretariat. Based on review, it is known that RaCP compensation plan has been approve by RSPO which inform by email on 9 September 2022. Based on the email inform about the FCL for PWS is 0 and there are 464.4 Ha remediation area consist of 1.7 Ha riparian area of Sungai Meranti and 462.7 Ha of peat area.

##### 7.12.2

Certification unit already has an identification document for High Conservation Value Areas (HCV) which is contained HCV Study Report document in the May 2022. The study was conducted by Aksenta using the Indonesian HCV Toolkit reference (2008) with the field data collection date being October 25, 2021. Based on the identification results, the HCV area is 56.1 Ha. Based on the verification of the HCV documents and when compared with maps of the distribution of water bodies, river maps and topographical maps, it shows that all areas that have the potential to become protected areas have entered into High Conservation Value Areas (HCV) and have been determined by the company.

HCV identified in PT Pinang Witmas Sejati consist of:

HCV Type	HCV Area	Hectarage before Delineation
HCV 4	Riparian Side and Flood Plains of Meranti river	1.6
HCV 1,3,4	Shrubs of riparian Penampin river	4.8
HCV 1,3,4	Shrubs of riparian Lalan river	9.8
HCV 4	Riparian Side, Flood Plains, Security border of Bakung river	36.7
HCV 4	Riparian Side, Flood Plains, Security border of Penampin river	2.0
HCV 6	Old Graveyard	0.03
HCV 6	Company's Graveyard	1.1
<b>TOTAL</b>		<b>56.1 ha</b>

In July 2022 the company followed up on the results of the PT PWS HCV Study report by delineating PT PWS' HCV indicative areas and found an area of **85.2 HCV areas**.

HCV Type	HCV Area	Hectarage after delineation
1.3, 3, 4.1, 4.3	Penampin River	8.2
4.1, 4.3	Bakung River	41,9
1.3, 3.4, 4.1, 4.3	Riparian side of Lalan River	8,9
4.1	Meranti River	0,8
6	Company's Graveyard	1,1
6	Old Graveyard	0,01
HCVMA	Reserved Conservation Area	24.3
<b>TOTAL</b>		<b>85,2 ha</b>

The entire HCV area owned by the certification unit is 56.1 Ha, while the HCV area which is informed in the basic information data is 85.2 Ha. The difference in area is because there is an area reserved to be maintained by the company as a conservation area.

The results of the document review and interviews with management representatives found that there was no new land clearing after November 2018, so the HCS study was not applicable.

### 7.12.3

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

### 7.12.4

Certification unit has procedures for maintaining protected areas and areas of high conservation value contained in the SOP document entitled Sustainability Standard Operating Procedures (SSOP) No 22. Identification, Management and Monitoring of Conservation Areas and Flora & Fauna with revision Number 3 issued on the 5th November 2020. The document explains the procedures owned by the company in HCV protection activities which are in accordance with the applicable laws and regulations, namely Presidential Decree No. 32 of 1990 concerning Protected Areas and PermenLH Number 29, 2009 concerning Guidelines for the Conservation of Biodiversity in the Regions. The SOP has explained several things, including:

- Socialization mechanism: prohibition of spraying and fertilizing and burning around the riparian area, outreach about conservation areas and protected species around the plantation and awareness of the "No Hunting" policy to protect protected and endangered species, outreach regarding sanctions to any individual who work for the company if proven to have violated the no hunting policy, outreach to the local community about the prohibition of logging forest trees in conservation areas.
- Management of protected areas and conservation areas: all conservation areas that have been identified must be delineated and mapped, the boundaries of the delineated conservation areas must be demarcated by placing numbered stakes/plates, for rehabilitation, local forest plants are planted on riparian area or left vegetated naturally.
- Monitoring protected areas and conservation areas: monitor poaching by a security guard and record it in a poaching monitoring book, use a checklist for monitoring conservation areas & flora and fauna, this monitoring is carried out at least 1 x 2 months by a designated officer, reporting all prohibited activities to authorities, report new signs of an emergency to superiors for follow-up action.

Some of the conservation area management activities include:

- Installing non-HCV conservation area boundary markers in areas that have been identified as conservation areas as listed in the PT. Pinang Witmas Sejati, the location of the conservation area boundary markers has been indicated in the Conservation Map.
- Installing signboards in the conservation area
- Routine outreach about the existence of conservation areas and restrictions on activities in conservation areas (HCV)
- Establish a conservation management unit
- Monitor animal species in conservation areas (HCV)

Based on the results of a visit to the HCV location, it was found that there was a spray limit and based on the results of interviews with the pesticide operator at Grik Estate, it was known that the workers were aware of the spray ban in the area around the riparian.

Based on the results of interviews, it is known that the integrated management plan has not yet been reviewed, because KKK as an RSPO member has just taken over this company in October 2022.

#### **7.12.5**

Based on interview with communities and field visit, known that there is no community rights inside the HCV area.

#### **7.12.6**

The unit of certification has conducted socialization related to protected areas along with socialization of the KKK Sustainability Policy, socialization of no burning, socialization of complaints/information submission procedures and socialization of employee recruitment conducted on the following dates:

- Socialization on 5 August 2022 which was attended by 15 participants
- Socialization on September 13 2022 which was attended by 8 participants
- Socialization on 21 September 2022 which was attended by 23 participants

Based on the results of interviews with pesticide operator at Grik Estate, it is known that workers already know about the HCV area and the prohibitions that may not be carried out in that area such as a ban on chemical application, a ban on hunting etc.

#### **7.12.7**

Unit of Certification has a flora and fauna monitoring program which is scheduled once a month and a recap is carried out every 6 months to update flora and fauna data found in the company area. Based on the Report on the Implementation of Management and Monitoring of High Conservation Value Areas of PT Pinang Witmas Sejati in 2022, the results of identification of flora and fauna in the company area were obtained, including:

- **Flora:** Consists of various types of plants, among which the most frequently encountered are Meranti.
- **Fauna:** Consists of various types of animals, the most common of which are monitor lizards, rat hawks, tiger cobras, striped fans, long-tailed monkeys, pythons, wild boars, deer etc.

Based on interviews with workers and results of field observations at Pasir Salak Estate and Grik Estate, it can be seen that the implementation and monitoring of HCV protected area management has been carried out in accordance with the management plan prepared by PT. PWS. In addition, it was also stated that there was no disturbance in the HCV area for the monitoring period of semester 1 of 2022.

#### **7.12.8**

RaCP compensation plan has been approve by RSPO which inform by email on 9 September 2022. Based on the email inform about the FCL for PWS is 0 and there are 464.4 Ha remediation area consist of 1.7 Ha riparian area of Sungai Meranti and 462.7 Ha of peat area.

<b>Status: Comply</b>
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**3.2 Conformity Checklist of Certificate and Trademark Use**

<b>1.</b>	<b>Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client</b>	<b>X or √</b>
IC	This matter will be verified further at annual surveillance audit	NA
	<b>Status: Not Applicable</b>	
<b>2.</b>	<b>Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use</b>	<b>X or √</b>
IC	This matter will be verified further at annual surveillance audit	NA
	<b>Status: Not Applicable</b>	
<b>3.</b>	<b>Implementation of Certificate and Trademark is not used on product</b>	<b>X or √</b>
IC	This matter will be verified further at annual surveillance audit	NA
	<b>Status: Not Applicable</b>	
<b>4.</b>	<b>Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.</b>	<b>X or √</b>
IC	This matter will be verified further at annual surveillance audit	NA
	<b>Status: Not Applicable</b>	

### 3.3 Summary of RSPO Partial Certification.

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

Kuala Lumpur Kepong Bhd Time Bound Plan is explained in point 1.10. Kuala Lumpur Kepong Bhd has informed the Time Bound Plan progress, MUTU has considered that Kuala Lumpur Kepong Bhd is complied with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by Kuala Lumpur Kepong Bhd on 15 November 2022.

MUTU has verified partial certification for un-certified unit's subsidiary of Kuala Lumpur Kepong Bhd based on their Time Bound Plan. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

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

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>Positive assurance statement provided, which does include the new mill found in the revised time bound plan</p> <p>Auditor verification: There is internal audit that has been conducted for uncertified unit:</p> <ul style="list-style-type: none"> <li>• PT Indonesia Plantation Synergy</li> <li>• PT Bumi Makmur Sejahtera Jaya</li> <li>• PT Prima Alumga</li> <li>• PT Pinang Witmas Sejati</li> <li>• PT Karya Bakti Sejahtera Agrotama</li> <li>• PT Menteng Jaya Sawit Perdana</li> <li>• PT Prima Bahagia Permai</li> <li>• PT Sinergi Agro Industri</li> <li>• PT Tekukur Indah</li> <li>• PT Putra Bongan Jaya</li> </ul>
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)	<p>The Company has conducted HCV assessment for all subsidiaries where the assessment report confirms that there was no replacement of primary forest or containing HCV. Related to the new mills and newly acquired land are waiting for the concept plan to be approved.</p> <p>Auditor verification: Auditor has verified the supporting evidence of above</p>

<b>Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		the company statement. The above statement in accordance with the supporting evidence provided. The uncertified that follow RaCP is PT Menteng Jaya Sawit Perdana. For other uncertified unit, known that there is no new planting
2.1.3	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<p>The newly acquired lands will adhere to the NPP procedures when it is ready. However, HCV assessment was conducted prior to development. There is new planting after January 2010 in PT PBJ which prior owned by other company. The NPP submission was not submitted by the previous owner, however HCV assessment was conducted prior to development.</p> <p>Auditor verification There is new planting after 2010 in PT Putra Bonga Jaya and this is uncertified unit will follow sanction. For the other uncertified unit, there is no new planting after 1 January 2010.</p>
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p>SIA conducted reported that there are land conflicts at some of the uncertified units and the company is handling through FPIC and grievance procedures.</p> <p>Auditor verification The company has procedure to resolve the land conflict which has explain that problem solving of conflict area.</p> <p>There is evidence of documented land dispute resolution for the uncertified units. No issue that obtains by web search.</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p>None noted. No stakeholder comments or complaints received.</p> <p>Auditor verification. There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries. The company has a mechanism for dealing with complaints.</p>
2.1.6	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1 (it has changed be Criterion 4.2 in P&C 2018).	<p>None noted. No stakeholder comments or complaints received.</p> <p>Auditor verification There's uncertified unit that still on HGU process:</p> <ul style="list-style-type: none"> <li>• PT Bumi Makmur Sejahtera</li> <li>• PT Menteng Jaya Sawit Perdana</li> </ul>

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

#### 3.4.1. Identification of Findings, Corrective Actions and Observations at Initial Certification Assessment

NCR No.	:	2022.01	Issued by	:	Septian Maulana
Date Issued	:	10 December 2022	Time Limit	:	9 December 2023
NC Grade	:	Major	Date of Closing	:	23 December 2023
Standard Ref. & Requirement	:	6.2.2 Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.			
<b>Evidence observed (filled by auditor):</b> During the audit activities, the auditor team discovered several facts including: <ul style="list-style-type: none"><li>• The results of interviews with harvest workers who were not working and the wives of workers in the Pangkor Estate OP99 housing, obtained information that the wives of workers who were not employees usually helped their husbands work as stragglers.</li><li>• Then, based on the results of field observations during harvesting activities at Pangkor Estate 2 Block W23, it was found that 1 worker was assisted by his wife (initial "F") who claimed not to be a company employee and 1 worker who was assisted by his parents (initial "M") who was also not an employee of the company. are employees of the company. Then, based on the document review, documentation of the working relationship between the company and family members who help workers in the field cannot yet be shown.</li><li>• Law of the Republic of Indonesia No. 13 of 2003 in article 50 and Government Regulation of the Republic of Indonesia No. 35 of 2021 in article 2 paragraph 1 states that employment relations occur because of an employment agreement between employers and workers/labourers.</li></ul>					
<b>Non-Conformance Description (filled by auditor):</b>  Based on this evidence, there are still people who work in a corporate environment without having a work relationship in the form of a work agreement. This is not in accordance with Law No. 13 of 2003 and Government Regulation no. 35 years 2021.					
<b>Root Cause Analysis (filled by organization audited):</b> On previous management policy there was no prohibiting workers from bringing in unregistered workers (wives or other helpers) has yet to be eradicated.					
<b>Correction (filled by organization audited):</b> <ul style="list-style-type: none"><li>• Identify all workers who bring unregistered workers</li><li>• GM reissues a memo/affirmation letter prohibiting the employment of unregistered</li><li>• GM memo socialization</li></ul>					
<b>Corrective Action (filled by organization audited):</b> <ul style="list-style-type: none"><li>• Make a statement signed by the worker regarding the prohibition and the sanctions</li><li>• Monitor workers who are not registered in the field every day</li></ul>					
<b>Assessor Evaluation and Conclusion (filled by auditor):</b>  Verify December 23, 2022					

The company has demonstrated identification of root cause analysis, correction and corrective action. Then, the company shows evidence of improvement including:

- Summary of the identification results of workers who bring workers who are not employees of PT Pinang Witmas Sejati for all estates and factory units. It is known that there was 43 unregistered worker in all estates, and there was none unregistered worker in factory units.
- Memo No. 2824/GM/PWS/XII/2022 dated 12 December 2022 which was signed by the General Manager regarding the confirmation of the prohibition on bringing family or other people who are not registered to the work location to help work. The document has been disseminated to all workers, for example the following socialization record:
  - Pasir Salak Estate on December 17, 2022
  - Pangkor Estate on December 17, 2022
  - Grik Estate on December 17, 2022
  - PWS Mill on December 17, 2022
- Statement letter signed by all employees of both Mill and Estate, which contains the following information:
  - Be aware of the prohibition against bringing family or unregistered workers to the workplace to help with work
  - If we violate, then we are willing to be given strict sanctions according to the rules set by the company
- Record of monitoring through the Foreman's Pocket Book, which contains information on the types of violations found (PPE, bringing unregistered workers and bringing children under 18 years of age), location and description. Monitoring is carried out every day by every foreman both at the Mill and Estate.

Based on the evidence that has been shown, the discrepancy is declared to have been **fulfilled**.

*Follow up on next audit (filled by auditor):*

Verified by

:

NCR No.	:	2022.02	Issued by	:	Helma Namira / Hasiholan Sihombing
Date Issued	:	10 December 2022	Time Limit	:	ASA-1
NC Grade	:	Minor	Date of Closing	:	9 January 2023
Standard Ref. & Requirement	:	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.			
Evidence observed (filled by auditor)					
<p>The company has SOPs related to the management of solid, liquid and airborne waste which are listed in the SSOP document No. 23 concerning Management of Hazardous waste and non-hazardous Wastes, and the 4th revision was carried out on May 2 2020. The SOP covers the management of all waste generated, including:</p> <ul style="list-style-type: none"><li>• Hazardous waste<ul style="list-style-type: none"><li>- Storage of hazardous waste is placed in a designated licensed Hazardous waste warehouse.</li><li>- Used Hazardous packaging must be stored separately in the Warehouse</li><li>- Each Hazardous waste must be labelled &amp; Hazardous waste Symbol</li><li>- Collectors who have permits must provide information about the use of Hazardous waste.</li><li>- All hazardous waste stored in the division may only be stored for 1 week (7 days) maximum.</li></ul></li></ul>					

- All Hazardous waste generated by housing must be submitted.
- It is not allowed to use used chemicals, oil and all kinds of things that are classified as B3 waste in housing.

• Non- Hazardous Waste (Domestic Waste)

- Transportation of waste to TPSA (Landfill) at least once a week.
- Waste disposal sites must be monitored/controlled using the warehouse checklist

However, based on the results of the field visit the following were found:

- There were used Hazardous waste containers (used pesticide jerry cans) in GriK Estate Block M11 Housing and in Pasir Salak Estate KM 12 Housing.
- There are lots of used chemical packaging (used jerry cans, used drums) placed on the 2nd Floor of the Pupuk Sentral Pasir Salak Estate Warehouse.
- There are several inappropriate domestic waste disposal points at Pasir Salak Estate KM 12 Housing, Pangkor Estate OP 99 Housing, Pangkor Estate OP 2007 Housing.

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

Based on the information above, it can be seen that there is still an implementation of waste management that is not in accordance with the procedures owned

**Root Cause Analysis** (filled by organization audited):

1. There is no awareness of workers/housing residents regarding the prohibition of using B3 waste for water storage/other purposes
2. Warehouse staff do not know the procedures for storing used chemical packaging
3. Garbage that has been around for a long time is difficult to get back and the collection of garbage has not covered all housing

**Correction** (filled by organization audited):

1. Collect all B3 waste from residential areas and hand it over to a licensed TPS for B3 waste (appendix 6)
2. Transferring used chemical packaging from the 2nd floor of the Pasir Salak Estate Warehouse to a licensed TPS LB3 (attachment 7)
3. Collecting and transporting waste from residential areas to TPSA (appendix 8)

**Corrective Action** (filled by organization audited):

1. Re-socialization to all housing occupants regarding the prohibition on the use of B3 waste (attachment 9a) and compensation for 1 new jerry can / house for all occupants for withdrawing the used B3 waste packaging (attachment 9b)
2. Conduct training for warehouse staff regarding SOP for storage of used chemical packaging (appendix 10)
3. Create mutual cooperation for clean Fridays to promote cleanliness in residential areas (appendix 11)
4. Provide a garbage collection checklist 1x1 week (attachment 12)
5. Provide a 1x6 month housing checklist (attachment 13)

**Assessor Evaluation and Conclusion** (filled by auditor):

**Verification December 23, 2022**

The company has explained and analysed the root causes of the non-conformities that have arisen and made explanations regarding preventive measures so that the same non-conformities reappear in the future. However, there has been no evidence of improvement as well as evidence of corrective/preventive actions described.

Therefore, the Non-conformity in this indicator **is still OPEN**.

**Auditor Verification 9 January 2023**

The unit of certification has determined the root cause of the problem and has provided an explanation regarding the correction and corrective action taken to address the root cause of the non-conformity. The unit of certification has also shown evidence of improvement and evidence of corrective/preventive actions as follows:

- Evidence of collection of hazardous waste in the form of used B3 packaging at the Pasir Salak Plantation, Pangkor Plantation, Grik Plantation and at the Pinang Witmas Sejati Palm Oil Mill.
- Data Collection of Handover of LB3 for PT Pinang Witmas Sejati's operational scope of plantations (Pasir Salak Estate, Pangkor Estate, Grik Estate)
- Data Collection of Handover of LB3 for PT Pinang Witmas Sejati's Palm Oil Mill.
- Documentary evidence of the collection of B3 waste in the form of used B3 packaging and expired chemicals from the 2nd floor of the Central Warehouse to a licensed TPS LB3.
- Documentary evidence of collecting and transporting waste from Pasir Salak Estate Housing, Pangkor Estate Housing, Grik Estate Housing, and Palm Oil Mill Housing Pinang Witmas Sejati to available TPSA
- Outreach on the prohibition of burning trash and the prohibition of using used B3 packaging in housing on December 29, 2022, at housing complex Km 12 OP 97 C.d. The socialization was attended by 38 participants. The document is accompanied by a list of attendees and photo documentation of the implementation.
- Outreach on the prohibition of burning trash and the prohibition of using used B3 packaging at Pasir Salak Estate Housing on December 29, 2022, which was attended by 25 participants. The document is accompanied by a list of attendees and photo documentation of the implementation.
- Outreach on the prohibition of burning waste and the prohibition of using used B3 packaging at the Pangkor Estate OP 99 Housing on 28 December 2022 which was attended by 31 participants. The document is accompanied by a list of attendees and photo documentation of the implementation.
- Outreach on the prohibition of burning waste and the prohibition of using used B3 packaging at the Pangkor Estate OP 07/08 Housing on 28 December 2022 which was attended by 33 participants. The document is accompanied by a list of attendees and photo documentation of the implementation.
- Outreach on the prohibition of burning waste and the prohibition of using used B3 packaging at Pangkor 1 Housing on 29 December 2022 which was attended by 30 participants. The document is accompanied by a list of attendees and photo documentation of the implementation.
- Outreach on the prohibition of burning trash and the prohibition of using used B3 packaging at Grik Estate Housing on 28 December 2022 and 29 December which was attended by 20 participants and 41 participants. The document is accompanied by a list of attendees and photo documentation of the implementation.
- Outreach on the prohibition of burning trash and the prohibition of using used B3 packaging at PWS POM Housing on December 28, 2022, which was attended by 51 participants. The document is accompanied by a list of attendees and photo documentation of the implementation.
- Documentary evidence of Provision of New Jerrycans to residents of Pasir Salak Estate Housing, Pangkor Estate Housing, and Grik Estate Housing.
- Procedure Training on Storage of Used Chemical Packaging on 14 December 2022 at PT PWS Main Warehouse attended by 8 participants. The document is accompanied by a list of attendees and photo documentation of the implementation.
- Documentary evidence of Gotong Royong - Friday Clean Activities for Residents of Pasir Salak Estate Housing, Pangkor Estates, Grik Estates and PKS PWS.
- Checklist for garbage collection once a week for all housing units in Pasir Salak Estate, Pangkor Estate, Grik Estate, and PKS PWS. The checklist contains information related to the results of monitoring of Domestic Waste management, such as the condition of waste disposal at TPSA, the condition of waste in housing, whether it is placed in the proper place, whether there are burnt waste points or not, as well as the examiner's signature.
- PT PWS Housing Inspection Checklist dated 29 December 2022. This checklist contains information related to the condition of infrastructure facilities, waste management and aspects of housing cleanliness both from the front yard, side yard, ditches, family rooms, toilets/toilets, and others.

Based on the explanation above, it means that this non-conformity **has been Closed** and will be observe again in next assessment.

<b>Verified by</b>	<b>:</b>	<b>Hasiholan Sihombing/Helma Namira</b>
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<b>NCR No.</b>	<b>:</b>	<b>2022.03</b>	<b>Issued by</b>	<b>:</b>	<b>Helma Namira / Hasiholan Sihombing</b>
<b>Date Issued</b>	<b>:</b>	<b>10 December 2022</b>	<b>Time Limit</b>	<b>:</b>	<b>ASA-1</b>
<b>NC Grade</b>	<b>:</b>	<b>Minor</b>	<b>Date of Closing</b>	<b>:</b>	<b>9 January 2023</b>
<b>Standard Ref. &amp; Requirement</b>	<b>:</b>	<b>7.3.3</b> <b>The unit of certification does not use open fire for waste disposal.</b>			
<b>Evidence observed (filled by auditor)</b> <p>The company has SOPs related to the management of solid, liquid and air waste as listed in the SSOP document No. 23 concerning hazardous and non-hazardous Waste Management, and the 4th revision was carried out on May 2, 2020. The SOP explains that waste is not permitted to be burned. The company also has a KKK Sustainable Policy Document which among other things regulates the implementation of a strict No Burning Policy in all KKK Operations Activities.</p> <p>Based on the results of the field visit, 2 burn marks were found at Pangkor Estate OP 99 Housing and 1 burn mark at Pangkor Estate OP 2007.</p> <p><b>Non-Conformance Description (filled by auditor):</b>  Based on the information above, there is still burning of household waste in several of these locations where this is not in accordance with the procedures and policies that are owned.</p>					
<b>Root Cause Analysis (filled by organization audited):</b> There was no routine schedule for garbage collection in every week for all housing					
<b>Correction (filled by organization audited):</b> Clean burn marks (appendix 8)					
<b>Corrective Action (filled by organization audited):</b> <ol style="list-style-type: none"> <li>1. Provide a waste collection checklist to ensure that this collection is carried out regularly 1x1 week (attachment 12)</li> <li>2. Re-socialize housing residents regarding the ban on burning garbage (attachment 9a)</li> </ol>					
<b>Assessor Evaluation and Conclusion (filled by auditor):</b> <p><b>Verification December 23, 2022</b>  The company has explained and analyzed the root causes of the non-conformities that have arisen and made explanations regarding preventive measures so that the same non-conformities reappear in the future. However, there has been no evidence of improvement as well as evidence of corrective/preventive actions described.</p> <p>Therefore, the Non-conformity in this indicator <b>is still OPEN</b>.</p> <p><b>Auditor Verification 9 January 2023</b>  The unit of certification has determined the root cause of the problem that is acceptable and has provided an explanation regarding the correction and corrective action taken to address the root cause of the non-conformity in an effective manner. The unit of certification has also shown evidence of improvement and evidence of corrective/preventive actions as follows:</p> <ul style="list-style-type: none"> <li>• Documentary evidence of collecting and transporting waste from Pasir Salak Estate Housing, Pangkor Estate Housing, Grik Estate Housing, and Palm Oil Mill Housing Pinang Witmas Sejati to available TPSA</li> <li>• Outreach on the prohibition of burning trash and the prohibition of using used B3 packaging in housing on</li> </ul>					

December 29 2022 at housing complex Km 12 OP 97 C.d. The socialization was attended by 38 participants. The document is accompanied by a list of attendees and photo documentation of the implementation.

- Outreach on the prohibition of burning trash and the prohibition of using used B3 packaging at Pasir Salak Estate Housing on December 29, 2022 which was attended by 25 participants. The document is accompanied by a list of attendees and photo documentation of the implementation.
- Outreach on the prohibition of burning waste and the prohibition of using used B3 packaging at the Pangkor Estate OP 99 Housing on 28 December 2022 which was attended by 31 participants. The document is accompanied by a list of attendees and photo documentation of the implementation.
- Outreach on the prohibition of burning waste and the prohibition of using used B3 packaging at the Pangkor Estate OP 07/08 Housing on 28 December 2022 which was attended by 33 participants. The document is accompanied by a list of attendees and photo documentation of the implementation.
- Outreach on the prohibition of burning waste and the prohibition of using used B3 packaging at Pangkor I Housing on 29 December 2022 which was attended by 30 participants. The document is accompanied by a list of attendees and photo documentation of the implementation.
- Outreach on the prohibition of burning trash and the prohibition of using used B3 packaging at Grik Estate Housing on 28 December 2022 and 29 December which was attended by 20 participants and 41 participants. The document is accompanied by a list of attendees and photo documentation of the implementation.
- Outreach on the prohibition of burning trash and the prohibition of using used B3 packaging at PWS POM Housing on December 28 2022 which was attended by 51 participants. The document is accompanied by a list of attendees and photo documentation of the implementation.
- Documentary evidence of Gotong Royong - Friday Clean Activities for Residents of Pasir Salak Estate Housing, Pangkor Estates, Grik Estates and PWS POM.
- Checklist for garbage collection once a week for all housing units in Pasir Salak Estate, Pangkor Estate, Grik Estate, and PWS POM. The checklist contains information related to the results of monitoring of Domestic Waste management, such as the condition of waste disposal at TPSA, the condition of waste in housing, whether it is placed in the proper place, whether there are burnt waste points or not, as well as the examiner's signature.
- PT PWS Housing Inspection Checklist dated 29 December 2022. This checklist contains information related to the condition of infrastructure facilities, waste management and aspects of housing cleanliness both from the front yard, side yard, ditches, family rooms, toilets/toilets, and others.

Based on the explanation above, it means that this non-conformity **has been Closed** and will be observe again in next assessment.

Verified by	:	Hasiholan Sihombing/Helma Namira
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**3.4.2. Opportunity for Improvement**

No	Ref. Std.	Description																		
1	3.6.2	<p><b>The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored</b></p> <p>The company has monitored the validity period of the OHS license for each operator who requires an OHS license, based on the results of the verification of the OHS license monitoring document as of June 2022 it is known that several OHS operator licenses are still in the process of obtaining it for Steam Aircraft and Pressure Vessels, Electrical Technicians, OHS Electricians and OHS Fires. Companies are encouraged to ensure the issuance of OHS licenses for every operator that requires an OHS license.</p>																		
2	6.2.4	<p><b>The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</b></p> <p>The results of field observations, for example in the Grik Estate Blok M 11 housing complex, were found to be houses with damaged ceilings and sanitation facilities, which has been conveyed to the company.</p> <p>In this regard, the company showed the Continuous Improvement Plan document for 2022 – 2026, which was signed by the Senior Manager on October 1, 2022. The document contains, among other things:</p> <table border="1"> <thead> <tr> <th>Detail</th><th>Target</th><th>Descriptions</th></tr> </thead> <tbody> <tr> <td>Construction of Employee Housing</td><td>2026</td><td>- Pasir Salak: 42 units - Pangkor 174 units - Grik 160 units</td></tr> <tr> <td>Employee Housing Improvements</td><td>2022/2023</td><td>All Estate</td></tr> <tr> <td>Residential Trench Repair</td><td>2022/2023</td><td>All Estate</td></tr> <tr> <td>Repair of broken residential toilets</td><td>2022/2023</td><td>All Estate</td></tr> <tr> <td>Production of WTP for clean water</td><td>2023/2024</td><td>All Estate</td></tr> </tbody> </table> <p>In addition, the company can show records of the progress of repairs to housing facilities that have been realized, such as identification of housing that requires repairs, documentation of purchases of goods for housing repair purposes and records of housing repairs.</p> <p>Based on the explanation above, companies are encouraged to realize maintenance programs and provide employee welfare facilities and infrastructure, especially housing and sanitation facilities in accordance with the plans that have been prepared.</p>	Detail	Target	Descriptions	Construction of Employee Housing	2026	- Pasir Salak: 42 units - Pangkor 174 units - Grik 160 units	Employee Housing Improvements	2022/2023	All Estate	Residential Trench Repair	2022/2023	All Estate	Repair of broken residential toilets	2022/2023	All Estate	Production of WTP for clean water	2023/2024	All Estate
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3	6.7.4	<p><b>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</b></p> <p>The company shows proof of BPJS Health and BPJS Employment payments, for example for October 2022 as follows:</p> <ul style="list-style-type: none"> <li>• Proof of BPJS Health Payment for October 2022 on 10 November 2022 for a total of 1,620</li> </ul>																		

No	Ref. Std.	Description																						
		<p>participants</p> <ul style="list-style-type: none"><li>• Proof of Payment for BPJS Health Care Workers for October 2022 on November 10, 2022 for a total of 9 participants</li><li>• Proof of Payment for BPJS <i>Ketenagakerjaan</i> for October 2022 on 25 October 2022 for a total of 1,399 participants</li><li>• Proof of Payment for PKWT Employment BPJS October 2022 dated October 25, 2022 for a total of 330 participants</li><li>• Proof of Payment for Contract Employee Employment BPJS for the month of October 2022 on September 26, 2022 for a total of 16 participants</li></ul> <p>Based on the results of a study of labor list documents, for example in October 2022 it is known that the total workforce at PT PWS is 1,827 people. So, it was found that there was a difference between the number of workers and the number of BPJS participants with the following details:</p> <table><tr><th>Description</th><th>Workers</th></tr><tr><td>Total manpower</td><td>1,827</td></tr><tr><td><b>BPJS Health Paid</b></td><td></td></tr><tr><td>Permanent/ Daily</td><td>1,620</td></tr><tr><td>Contract</td><td>9</td></tr><tr><td><b>BPJS Employment Paid:</b></td><td></td></tr><tr><td>Permanent</td><td>1,399</td></tr><tr><td>Daily</td><td>330</td></tr><tr><td>Contract</td><td>16</td></tr><tr><td><b>Difference BPJS Health</b></td><td><b>198</b></td></tr><tr><td><b>Difference BPJS Employment</b></td><td><b>82</b></td></tr></table> <p>The results of interviews with company management representatives, it is known that the difference is due to several things, such as workers registered as Contribution Assistance Recipients, Personal Identity not yet online, Premium Arrears, Inactive due to duplicate data, still active in other companies, completeness of data. Regarding workers who have not been registered, monitoring documents can be shown, plans for registration in the following month and if a work accident occurs, the company will bear it.</p> <p>Based on the evidence above, companies have opportunities for improvement by ensuring the process of registering workers into the BPJS Health and BPJS Employment programs.</p>	Description	Workers	Total manpower	1,827	<b>BPJS Health Paid</b>		Permanent/ Daily	1,620	Contract	9	<b>BPJS Employment Paid:</b>		Permanent	1,399	Daily	330	Contract	16	<b>Difference BPJS Health</b>	<b>198</b>	<b>Difference BPJS Employment</b>	<b>82</b>
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**3.4.3. Noteworthy Positive Components**

No	Description
1	The Company's commitment to implementing the principles of sustainable palm oil management.
2	Good cooperation from staff/PIC related to audit implementation.
3	The company has a policy regarding the prohibition of paraquat use and has implemented it.

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

Issues from Public	Auditor Verification
<p><b>Manpower Agency of Musi Banyuasin District</b></p> <ul style="list-style-type: none"> <li>The Certification Unit has routinely carried out mandatory reports such as the WLTk Report to the Manpower and Transmigration Office of the Musi Banyuasin District without any problems.</li> <li>The unit of certification already has a Worker's Union Named the PT PWS Company Level Worker's Union which has been registered with the Manpower Office.</li> <li>The status of PT PWS employees is permanent workers and there are no longer daily workers or contract workers.</li> <li>The minimum wage that is enforced follows the UMK of Musi Banyuasin District.</li> </ul> <p><b>Negative Issues:</b></p> <ul style="list-style-type: none"> <li>Certification unit already has several operating permits for work equipment such as boilers, generators, sterilizers, heavy equipment etc. It is known that the unit of certification also has an SIO (Operator License) for several workers with certain types of work. Some of the work tool permits and SIO have expired, and some are still valid.</li> <li>The company already has P2K3 and firefighter team, that has been registered and has general AK3 (general OHS Expert). However, it is known that the company does not yet have a fire AK3 (OHS for Fire Expert).</li> </ul>	<p><b>Issue Clarification:</b></p> <ul style="list-style-type: none"> <li>It was discovered that several permits related to work tools and workers who served as operators for several types of work, were found to have expired and during the audit activities they were in the final stages of the permit extension process and SIO.</li> <li>The unit of certification is known to have conducted training and management for AK3 Fire (OHS Expert), AK3 Electricity, general AK3 for factories, and AK3 gas detectors as well as for welders, all of whom have completed training and received diplomas. It is known, the AK3 certificate (OHS Expert) will be issued 3 months after the diploma is issued in November, namely in February 2023.</li> </ul>
<p><b>Plantation Agency of Musi Banyuasin District</b></p> <ul style="list-style-type: none"> <li>Unit Certification already has legality documents such as determination of plantation class, Permanent Business Permit, Plantation Business Permit for a study area of 14,980.49 ha.</li> <li>The Unit of Certification is also known to have carried out mandatory reporting such as the LKUP Report which has been done through an online application owned by the Plantation Office of the Musi Banyuasin District</li> <li>Based on public consultation, it is known that plantation agency gave information which based on IUP, unit certification has the responsibility to provide development of plasma plantation, or to provide the Development productive business for community estates. Plantation agency did not force companies to provide the development of plasma plantation if there was some development for productive business for community estates.</li> </ul>	<p><b>Issue Clarification:</b></p> <ul style="list-style-type: none"> <li>The company has stated that it is willing to develop smallholdings for the community if the community can provide land for the company to manage.</li> <li>However, the results of verification in the field, and the results of supervision from the Banyuasin Regency Plantation Office, it is known that the development of community plasma plantations is constrained by the availability of land.</li> </ul>

Issues from Public	Auditor Verification
<p>Negative Issues:</p> <ul style="list-style-type: none"> <li>It is known that the community has made complaints regarding the company's obligation to establish plasma estate.</li> <li>The Musi Banyuasin District Plantation Office informed that the company has options to carry out productive business activities in addition to the obligation to develop community plasma plantations. However, from the results of the last supervision in 2022, it is known that the company has not carried out these productive business activities.</li> </ul>	
<p><b>Land Office of Musi Banyuasin District</b></p> <ul style="list-style-type: none"> <li>The land rights permits owned by the company already exist and are still valid, so far no permits are still in the process of being extended or applying for new permits.</li> <li>The company has routinely provided information related to land use, including reports related to fire monitoring.</li> <li>So far, no information has come to Land Office regarding the issue of land disputes and the provision of CSR</li> <li>Communication between agencies and companies has been well established.</li> </ul>	<p>There are no negative issues that need further verification.</p>
<p><b>Environmental Agency of Musi Banyuasin District</b></p> <ul style="list-style-type: none"> <li>The certification unit already had an ANDAL document in 1999 with a study area of 14,988 Ha and a Palm Oil Mill Capacity of 60 Tons of FFB/Hour.</li> <li>The unit of certification has carried out an Addendum to the ANDAL (EIA) in 2016 for a study area of 14,980.49 Ha with an additional capacity of the Palm Oil Mill from 60 Tons of FFB/Hour to 90 Tons of FFB/Hour.</li> <li>It is known that the company already has an Environmental Management Permit in the form of an Environmental Permit, Land Application Permit, TPS LB3 Permit, Surface Water Use Permit.</li> <li>Coordination and communication with agencies have been running quite well, the company is considered quite routine and obedient in carrying out mandatory reporting to DLH (Environmental Agency)</li> </ul> <p><b>Negative Issues:</b></p> <ul style="list-style-type: none"> <li>It is known that around August 2022 a field inspection was carried out by the Musi Banyuasin District Environmental Office at the location of PT Pinang Witmas Sejati's Palm Oil Mill. From the results of the field visit, it was conveyed that the factory was in an unsanitary condition, lots of oil was spilled, and trash at various points was not managed and was not placed in the bins provided, and the storage</li> </ul>	<p>Issue Clarification:</p> <ul style="list-style-type: none"> <li>The certification unit already had an ANDAL document in 1999 with a study area of 14,988 Ha and a Palm Oil Mill Capacity of 60 Tons of FFB/Hour.</li> <li>The company has made efforts to improve the cleanliness of the factory area, based on the findings of supervision conducted by Environmental agency. During a field visit it was found that the factory was clean and no oil spills were found around the POM processing area.</li> <li>Based on the results of a field visit to the empty fruit bunch site at PWS POM, it is not certain where the leachate goes and it is not seen that there is equipment to pump the leachate to flow into the waste pond. The company explained that it is related to the utilization of empty fruit bunch waste, namely empty fruit bunch which is produced as a result of the management of waste directly transported and delivered to the planting block to be applied as organic fertilizer. The company informs that it is currently in the planning stages for the construction of a leachate storage pond near the empty fruit bunch storage</li> </ul>

Issues from Public	Auditor Verification
<p>conditions for empty fruit bunch were not managed properly, causing leachate which was quite a lot with leachate disposal streams that are not clear where it ends and where it is accommodated.</p> <ul style="list-style-type: none"> <li>DLH conveyed to the company to ensure that the TPSA (Landfill) location is far from settlements and water sources.</li> </ul>	<p>location, in which the procedure for pumping leachate storage water from the leachate ditch to the waste pond 1 will be carried out using the water pump provided. This statement is supported by a map of the wastewater disposal plan at the factory, which informs that there will be a leachate waste storage pond and a pump is provided near the leachate storage pond to drain the leachate waste from the empty fruit bunch into waste pond 1 (Cooling Pond).</p> <ul style="list-style-type: none"> <li>Based on the results of the field visit, it was found that there was a Landfill that was placed close to the Elementary school and close to the ditch, based on further information and verification from the auditor it was known that the Landfill was still the legacy of the old management before the transition to the new management unit, it was also known that the company had relocated the location Landfill to other locations so that all Landfill owned by the company are located far from settlements and water sources.</li> </ul>
<p><b>Villages around the Company</b> Interviewees:</p> <ol style="list-style-type: none"> <li><b>Muara Merang Village (Secretary Village and Community Leader)</b></li> <li><b>Mangsang Village (Secretary Village)</b></li> </ol> <ul style="list-style-type: none"> <li>The existence of the company has had a positive impact on the surrounding community, such as the provision of lighting assistance for the Diesel Power Plant owned by Muara Merang Village, the opening of job opportunities and road access.</li> <li>So far, the Village has also been involved in determining programs for CSR through informal meetings.</li> <li>There are no conflicts between the company and the community regarding land boundaries or environmental disturbances. The problems related to the development of plasma.</li> </ul>	<p>There are no negative issues that need further verification.</p>
<p><b>2 Previous land owners who have been compensated from Muara Merang Village.</b></p> <ul style="list-style-type: none"> <li>During the land compensation process, previously socialized what the land would be used for and asked for approval. In addition, to the people who refuse there is no violence or coercion.</li> <li>So far there have been no conflicts between the company and the surrounding community in Muara Merang Village</li> </ul>	<p>There are no negative issues that need further verification.</p>

Issues from Public	Auditor Verification
<p>and only had questions from the community regarding the construction of the plasma. However, currently the company has made progress to facilitate partnership development.</p> <ul style="list-style-type: none"> <li>PT PWS has had a positive impact on the community in Muara Merang Village such as providing CSR in the form of maintenance of Diesel Power Plants in Muara Merang Village and the existence of job opportunities.</li> </ul>	
<p><b>Gender Committee of PT Pinang Witmas Sejati</b></p> <ul style="list-style-type: none"> <li>The gender committee was formed in 2022, but since before the existence of the gender committee there have never been any complaints or complaints regarding acts of harassment, violence or gender discrimination.</li> <li>The purpose of establishing a gender committee is to serve as a means for employee complaints regarding gender issues. The existence of a gender committee has been socialized to workers.</li> <li>The company monitors menstruation days and pregnancy checks to ensure that no workers who are pregnant or breastfeeding work with chemicals.</li> <li>The company has facilitated the needs of mothers who have just given birth such as providing <i>posyandu</i> activities, providing time for breastfeeding children, providing breastfeeding corners and child care.</li> <li>As a form of gender equality, the company also provides opportunities for female workers to become supervisors.</li> <li>The company has also conducted general health checks for all workers and special health checks for workers with certain risks.</li> </ul>	<p>There are no negative issues that need further verification.</p>
<p><b>FFB Transport Contractor (PT Pelangi Muda Sejahtera)</b></p> <ul style="list-style-type: none"> <li>Contractors cooperate with companies in the field of FFB, Empty Bunch and Kernel transportation</li> <li>In collaborating with PT PWS, the contractor has been given several requirements and socialization including no underage child labour, provision of a minimum wage, provision of PPE, business code of ethics and BPJS registration.</li> <li>PT PWS also evaluates and checks the requirements given.</li> <li>So far, the collaboration has been quite good and there have been no complaints including bill payments.</li> </ul>	<p>There are no negative issues that need further verification.</p>
<p><b>FFB Supplier (Makmur Sakti Cooperative)</b></p> <ul style="list-style-type: none"> <li>The cooperative cooperates with companies in the field of transportation for the provision of FFB</li> </ul>	<p>There are no negative issues that need further</p>

Issues from Public	Auditor Verification
<ul style="list-style-type: none"> <li>In collaborating with PT PWS, the supplier has been given several requirements and socialization including no underage child labour, provision of a minimum wage, provision of PPE, business code of ethics and BPJS registration.</li> <li>PT PWS also evaluates and checks the requirements given.</li> <li>So far, the collaboration has been quite good and there have been no complaints including bill payments.</li> </ul>	<p>verification.</p>
<p><b>Worker Union SBSI (Serikat Buruh Sejahtera Indonesia)</b></p> <ul style="list-style-type: none"> <li>The SBSI has been registered with the Manpower Office as evidenced by the document Proof of Registration of the Trade Union.</li> <li>The status of PT PWS employees is permanent workers and there are no daily workers or contract workers anymore.</li> <li>The minimum wage that is enforced follows the Musi Banyuasin District Minimum Wage.</li> </ul>	<p>There are no negative issues that need further verification.</p>
<p><b>Workers Union: SPTP (Serikat Pekerja Tingkat Perusahaan)</b></p> <ul style="list-style-type: none"> <li>The unit of certification already has a Worker's Union called the PT PWS Company Level Worker's Union</li> <li>The union has been registered with the Manpower Office as evidenced by the document Proof of Registration of the Trade Union.</li> <li>The labor union already has a PKB and is attended by the majority of PT PWS workers.</li> <li>The PT PWS employee status is permanent workers and there are no daily workers or contract workers anymore.</li> <li>The minimum wage that is enforced follows the UMK of Musi Banyuasin District</li> </ul> <p>Negative Issues: The company's PKB will expire in May 2023, the union representative hopes that the company can facilitate the extension of the document's validity period.</p>	<p>Issue Clarification: The company is willing to facilitate the extension of the PKB document before the validity period expires in May 2023. The extension process will start around the end of December 2022 or early January 2023.</p>
<p><b>Issues from the internet</b></p> <p>The results of the auditor team's search in online media found several news links in early 2022 with the same content, namely a demonstration of demands from community representatives regarding PT PWS' obligations in the construction of the plasma. Here are some news links:</p> <ul style="list-style-type: none"> <li><a href="https://coganews.co.id/2021/02/10/pt-pinang-witmas-">https://coganews.co.id/2021/02/10/pt-pinang-witmas-</a></li> </ul>	<p>In this regard, the auditor verified by conducting consultations through interviews with relevant agencies, Mangsang Village, Muara Merang Village and also PT PWS management representatives to obtain more complete information. From the results of the verification, information was obtained that the</p>

Issues from Public	Auditor Verification
<p><a href="#">sejati-harus-serahkan-2-563-hektar-lahan-kebun-plasma-rakyat/</a></p> <ul style="list-style-type: none"> <li>• <a href="https://tintamerah.co.id/jika-tak-patuhi-uu-pt-pinang-witmas-bisa-disanksi/">https://tintamerah.co.id/jika-tak-patuhi-uu-pt-pinang-witmas-bisa-disanksi/</a></li> <li>• <a href="https://sumselnews.co.id/soal-plasma-pt-pinang-witmas-sejati-digugat-24-milyar/">https://sumselnews.co.id/soal-plasma-pt-pinang-witmas-sejati-digugat-24-milyar/</a></li> <li>• <a href="https://mediatargetkasus.com/2022/08/03/gelar-aksi-demo-masyarakat-desa-muara-merang-dan-desa-mangsang-menuntut-pt-pinang-witmas-sejati-segera-memberikan-kebun-plasma-untuk-masyarakat/">https://mediatargetkasus.com/2022/08/03/gelar-aksi-demo-masyarakat-desa-muara-merang-dan-desa-mangsang-menuntut-pt-pinang-witmas-sejati-segera-memberikan-kebun-plasma-untuk-masyarakat/</a></li> <li>• <a href="https://straightnews.id/2022/04/08/ribuan-warga-3-desa-kawal-pemeriksaan-setempat-sengketa-lahan-plasma-pt-pinang-witmas-sejati-dengan-warga/">https://straightnews.id/2022/04/08/ribuan-warga-3-desa-kawal-pemeriksaan-setempat-sengketa-lahan-plasma-pt-pinang-witmas-sejati-dengan-warga/</a></li> </ul>	<p>news was true where there were demands from several community representatives through the <i>Forum Komunikasi Pemuda Kepayang Merang Bersatu</i> (F-KPKMB) to PT PWS regarding the obligation to build the plasma, but this was resolved in the District Court with the issuance of a Deed of Peace (Deed of Van Dading) Number: 1/Pdt.G/2022/PN.Sky on 14 July 2022 by the Sekayu District Court which stated that the parties were willing to end the dispute between them as stated in the Claim Letter dated 26 January 2022 with the Case Register Number 1/ Pdt.G/2022/PN.Sky and for this matter the Parties have entered into a written Agreement in the form of a Peace Agreement dated 13 July 2022 and the Parties have signed the Peace Agreement. In summary, the contents of the agreement are that PT PWS is willing and responsible as an avalist in facilitating the development of community oil palm plasma plantations in 3 villages, namely Muara Merang Village, Mangsang Village and Kepayang Village with all costs for the development of community plantations including costs for arranging permits and changing status functions Production Forest area to be an Area for Other Uses (<i>Area Penggunaan Lain</i>) on land proposed by the community, where all management costs will be calculated as debts of farmers and/or farmer cooperatives and will be paid in stages after the plasma plantations produce a harvest of oil palm fruit and then the construction of the oil palm plasma plantations will be realized by PT PWS after obtaining all permits from the Government of the Republic of Indonesia and other related agencies.</p>
<p><b>Employee Cooperative (Sungai Malayu Sejati)</b></p> <p>The employee cooperative is engaged in the provision of staple goods. The cooperative is fully managed by cooperative management which is a separate part of the company, the company only provides locations and buildings for cooperative activities, every PT PWS employee can register to become a member of the cooperative. The cooperative already has a business license, deed of establishment, AD/ART, organizational structure of the cooperative and has routinely held Annual Member Meetings, the last of which will be held in 2022.</p>	<p>There are no negative issues that need further verification. The company already has an employee cooperative that operates in the basic food sector and complies with regulations. It has been described in related indicators.</p>

Issues from Public	Auditor Verification
<p><b>Local Contractor of PT SKJ (Sumatra Kalimantan Jaya)</b></p> <ul style="list-style-type: none"> <li>• The company in preparing the work contract has involved both parties who have an agreement.</li> <li>• The contractor focuses on heavy equipment rental services.</li> <li>• There are several types of work being carried out for the Collaboration period in 2022, including work for the construction of fire towers, replanting, road maintenance.</li> <li>• So far there have never been any problems with payments.</li> <li>• Contractor workers are permanent employees of PT SKJ and have been facilitated with PPE, and BPJS Employment and BPJS Health.</li> </ul>	<p>There are no issues that need further clarification.</p>

<b>4.0</b>	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>
<b>4.1</b>	<b>Formal Sign-off of Assessment Findings</b>
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end; margin-top: 100px;"> <div style="text-align: center;"> <p><b>PT Pinang Witmas Sejati</b> <b>Management Representative</b></p>  <p><b>PT. ZULHAM, MP</b> Monday, 09 January 2023</p> </div> <div style="text-align: center;"> <p><b>MUTU International</b> <b>Lead Auditor</b></p>  <p><b>Hasiolan Sihombing</b> Monday, 09 January 2023</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	2 Previous Land Owner from Muara Merang Village	Muara Merang Village, Musi Banyuasin District, Province of Sumatera Selatan, Indonesia	-	Direct	6 December 2022	✓	
2	14 Previous Land Owner from Muara Merang Village	Muara Merang Village, Musi Banyuasin District, Province of Sumatera Selatan, Indonesia	-	Direct	6 December 2022		✓
3	Secretary Village of Muara Merang Village	Muara Merang Village, Musi Banyuasin District, Province of Sumatera Selatan, Indonesia	-	Direct	6 December 2022	✓	
4	Secretary Village of Mangsang Village	Muara Merang Village, Musi Banyuasin District, Province of Sumatera Selatan, Indonesia	-	Direct	6 December 2022	✓	
5	Committee Gender of PT PWS	Muara Merang Village, Musi Banyuasin District, Province of Sumatera Selatan, Indonesia	-	Direct	6 December 2022	✓	
6	Workers Union (SPTP) Serikat Pekerja Tingkat Perusahaan	Muara Merang Village, Musi Banyuasin District, Province of Sumatera Selatan, Indonesia	-	Direct	6 December 2022	✓	
7	Labor's Union (SBSI)	Muara Merang Village, Musi Banyuasin District, Province of Sumatera Selatan, Indonesia	-	Direct	6 December 2022	✓	
8	Local's Contractor PT SKJ (Sumatra Kalimantan Jaya)	Muara Merang Village, Musi Banyuasin District, Province of Sumatera Selatan, Indonesia	-	Direct	6 December 2022	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
		Indonesia					
9	FFB Supplier KMS (Koperasi Makmur Sakti)	Musi Banyuasin District, Province of Sumatera Selatan, Indonesia	-	Direct	6 December 2022	✓	
10	Environmental Land Agency of Musi Banyuasin District	Musi Banyuasin District, Province of Sumatera Selatan, Indonesia	-	By Phone	6 December 2022	✓	
11	Plantation Agency of Musi Banyuasin District	Musi Banyuasin District, Province of Sumatera Selatan, Indonesia	-	By Phone	6 December 2022	✓	
12	Manpower Agency of Musi Banyuasin District	Musi Banyuasin District, Province of Sumatera Selatan, Indonesia	-	By Phone	6 December 2022	✓	
13	Land Office of Musi Banyuasin District	Musi Banyuasin District, Province of Sumatera Selatan, Indonesia	-	By Phone	6 December 2022	✓	
14	Local Contractor of PT PMS (PT Pelangi Muda Sejahtera)	Musi Banyuasin District, Province of Sumatera Selatan, Indonesia	-	By Phone	6 December 2022	✓	
15	Pasir Salak Estate: <ul style="list-style-type: none"> <li>• 16 fire extinguishers</li> <li>• 7 warehouse clerks</li> <li>• 1 generator operator</li> <li>• 6 mechanics</li> <li>• 1 resident of housing</li> <li>• 3 clinic staff</li> <li>• 1 daycare worker</li> <li>• 3 harvesting workers</li> <li>• 4 spraying workers</li> <li>• 1 nursery worker</li> </ul>	Musi Banyuasin District, Province of Sumatera Selatan, Indonesia	-	Direct	6 December 2022	✓	
15	Pangkor Estate: <ul style="list-style-type: none"> <li>• 9 Spray Workers</li> <li>• 3 harvest workers and 2</li> </ul>	Musi Banyuasin District, Province of Sumatera Selatan, Indonesia	-	Direct	7 December 2022	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
	<p>pickers</p> <ul style="list-style-type: none"> <li>1 Operator of Rinse House, Fertilizer Storage, Mixing Chemical Storage.</li> <li>1 Harvest Worker in Housing of OP 99.</li> </ul>						
16	<p>Pinang Witmas Sejati POM:</p> <ul style="list-style-type: none"> <li>1 WWTP pond operator</li> <li>2 clinic staff</li> <li>1 resident of the housing</li> <li>1 Operator of Oil Storage, Central Warehouse, and Chemical Storage.</li> <li>1 Operator of WTP.</li> <li>1 Operator of Workshop and Hazardous Waste Temporary Storage.</li> <li>1 Foreman of Fire Squad, and 8 members of Fire Squad.</li> <li>2 Grading Officers</li> <li>3 Securities</li> <li>2 Weighbridge Operators</li> <li>1 Boiler Operator</li> <li>2 Engine Room Operators</li> <li>1 Press Operator</li> </ul>	Musi Banyuasin District, Province of Sumatera Selatan, Indonesia	-	Direct	7 December 2022	✓	
17	<p>Grik Estate:</p> <ul style="list-style-type: none"> <li>1 Workers of Harvest.</li> </ul>	Musi Banyuasin District, Province of Sumatera Selatan,	-	Direct	8 December 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 Workers of Harvest Foreman.</li> <li>• 4 Worker's and 1 Foreman of Fruit Loose Collecting</li> <li>• 2 Workers of maintenance (IPM and Spraying)</li> <li>• 2 Warehouse Officers</li> <li>• 1 Mixing Officer</li> <li>• 1 Nurse</li> <li>• 1 midwife</li> <li>• 1 FFB Loader</li> </ul>	Indonesia					
18	Sawit Watch	Bogor City, Jawa Barat Province	<a href="mailto:info@sawitwatch.or.id">info@sawitwatch.or.id</a>	Via Email	23 November 2022	-	✓
19	WWF	Jakarta Selatan City, DKI Jakarta Province	<a href="mailto:wwf-indonesia@wwf.or.id">wwf-indonesia@wwf.or.id</a>	Via Email	23 November 2022	-	✓
20	Walhi	Jakarta Selatan City, DKI Jakarta Province	<a href="mailto:informasi@walhi.or.id">informasi@walhi.or.id</a>	Via Email	23 November 2022	-	✓
21	AMAN	Jakarta Selatan City, DKI Jakarta Province	<a href="mailto:rumahaman@cbn.net.id">rumahaman@cbn.net.id</a>	Via Email	23 November 2022	-	✓

**Appendix 2. Assessment Program**

DATE	5 – 10 December 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
<b>Monday, 5 December 2022</b>		
08.55 – 10.15	<b>JAKARTA → JAMBI</b>	<b>All Auditor</b>
10.30 – 16.00	<b>From the Airport to the Audit Location</b>	<b>All Auditor</b>
16.00 – 17.00	<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 &amp; Management Representatives of PT PWS</b>
<b>Tuesday, 6 December 2022</b>		
08.00 – 12.00	<ul style="list-style-type: none"> <li>Stakeholders' consultation to related agencies</li> <li>Stakeholder consultation to affected community's owners by phone.</li> <li>Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Smallholders, third Party Supplier (if any), local NGO (if any).</li> </ul>	<b>HEN &amp; SEP</b> <b>HEN &amp; SEP</b> <b>HEN &amp; SEP</b>
08.0 – 12.00	<b>Field Observation to Pasir Salak Estate</b> <ul style="list-style-type: none"> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries); HCV;</li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health &amp; Safety aspect, Implementation of Employment Procedure and Mechanism Aspect</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), Observation of Workers Facilities (Housing, School, worship Place).</li> </ul>	<b>HAS</b>  <b>HAS</b>  <b>TIO</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 16.30	<ul style="list-style-type: none"> <li>Continuing stakeholder Consultation (if anything was not done the previous day)</li> <li>Document Verification and Completing Checklist</li> </ul>	<b>All Auditor</b>
16.30 – 17.00	Submission of Audit Progress	<b>All Auditor</b>
<b>Wednesday, 7 December 2022</b>		
08.00 – 12.00	<b>Field Observation to Pangkor Estate</b> <ul style="list-style-type: none"> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries); HCV;</li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health &amp; Safety aspect, Implementation of Employment Procedure and Mechanism Aspect</li> <li>Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage,</li> </ul>	<b>HAS</b>  <b>TIO</b>  <b>SEP &amp; HEN</b>

DATE	5 – 10 December 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, worship Place).	
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 16.30	<b>Field Observation to PWS POM</b> <ul style="list-style-type: none"> <li>Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO)</li> <li>Implementation of Occupational Health &amp; Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect, Security Post, FFB Sorting, Processing Activity, Despatch CPO</li> <li>Implementation of Environmental aspects, Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, WTP, Workshop,</li> <li>POME Pond &amp; Land Application, Empty Bunch Area, and Employee Housing Complex</li> </ul>	<b>SEP</b>  <b>SEP</b>  <b>HAS &amp; HEN</b>  <b>TIO</b>
16.30 – 17.00	Submission of audit Progress	<b>All Auditor</b>
<b>Thursday, 8 December 2022</b>		
08.00 – 12.00	<b>Field Observation to Grik Estate</b> <ul style="list-style-type: none"> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries); HCV;</li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health &amp; Safety aspect, Implementation of Employment Procedure and Mechanism Aspect</li> <li>Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, worship Place).</li> </ul>	<b>HAS</b>  <b>TIO &amp; HEN</b>  <b>SEP</b>
12.00 – 14.00	<b>Break</b>	
14.00 – 16.30	Document Verification and Completing Checklist	<b>All Auditor</b>
16.30 – 17.00	Submission of audit Progress	<b>All Auditor</b>
<b>Friday, 9 December 2022</b>		
08.00 – 12.00	Document verification and completing checklist	<b>All Auditor</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 16.30	Document verification and completing checklist	<b>All Auditor</b>
16.30 – 17.00	Submission of audit Progress	<b>All Auditor</b>
<b>Saturday, 10 October 2022</b>		
08.00 – 10.00	<b>Closing Meeting:</b>	<b>All Auditor</b>

DATE	5 – 10 December 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<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>	
10.00 – 15.00	Travel from audit site to the airport in Jambi	<b>All Auditor</b>
17.05 – 18.30	<b>JAMBI - JAKARTA</b>	<b>All Auditor</b>