

Roundtable on Sustainable Palm Oil Certification RSPO

[✓] Surveillance

Name of Management : Selapan Jaya Mill, subsidiary of PT Sampoerna Agro, Tbk.
 Organization :
 Plantation Name : Hikmah Dua Estate (PT Telaga Hikmah) and 11 smallholders: KUD Madya Karya Bhakti, KUD Bina Sejahtera, KUD Sedia Mukti, KUD Maju Lancar, KUD Jaya Makmur, KUD Sumber Sentosa, KUD Serba Usaha, KUD Intan, KUD Marga Mulya, KUD Jadi Mandiri and KUD Bina Tani Mulya
 Location : Kerta Mukti Village, Mesuji Raya Sub District, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia.
 Certificate Code : **MUTU-RSPO/142**
 Date of Initial Registration : 25 January 2017
 Date of Certificate Issue : 14 April 2022 Date of License Issue : 25 April 2023
 Date of Certificate Expiry : 24 January 2027 Date of License Expiry : 24 January 2024

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.1	21 to 25 November 2022	Rizliani Aprianita Hsb (Lead Auditor), Asystasya Aishah Silalahi Radytio Puspanjana, Firda Tarunajaya	Hasiholan Sihombing	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.1	09 March 2023

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 on March 12th, 2014 with registration number *ASI-ACC-055*

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Figure 1. Location Map of Selapan Jaya Mill- PT Sampoerna Agro

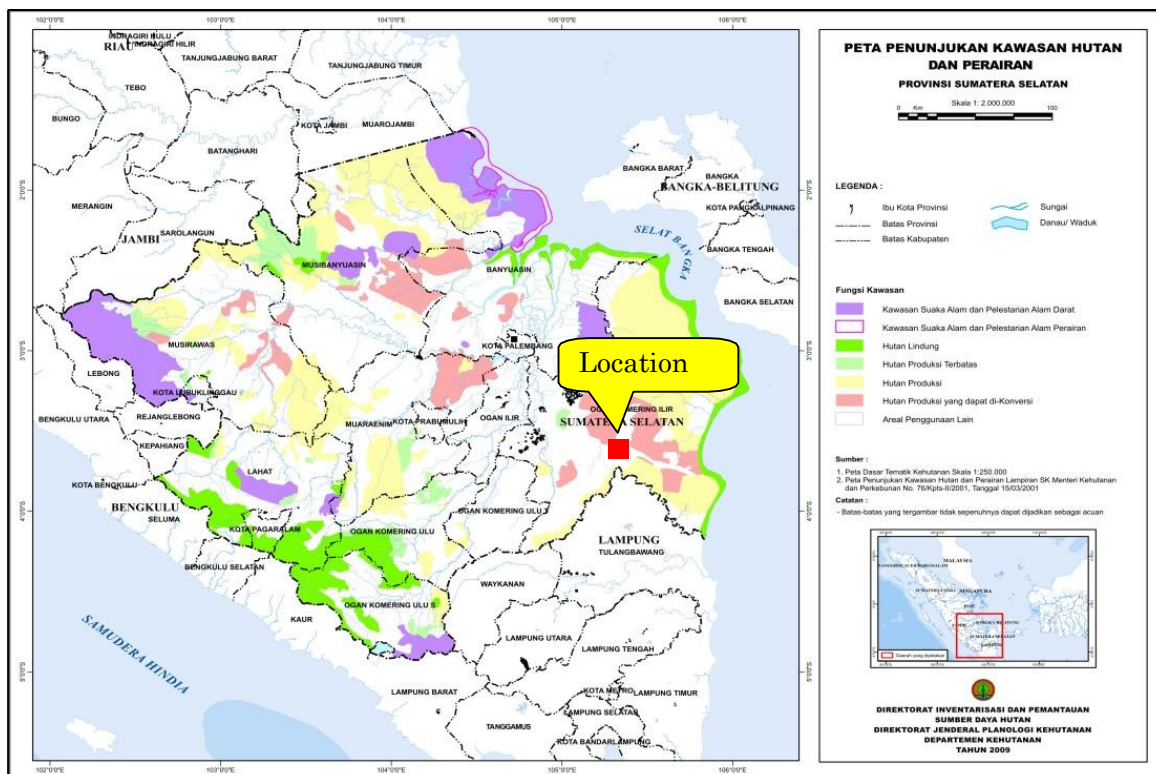
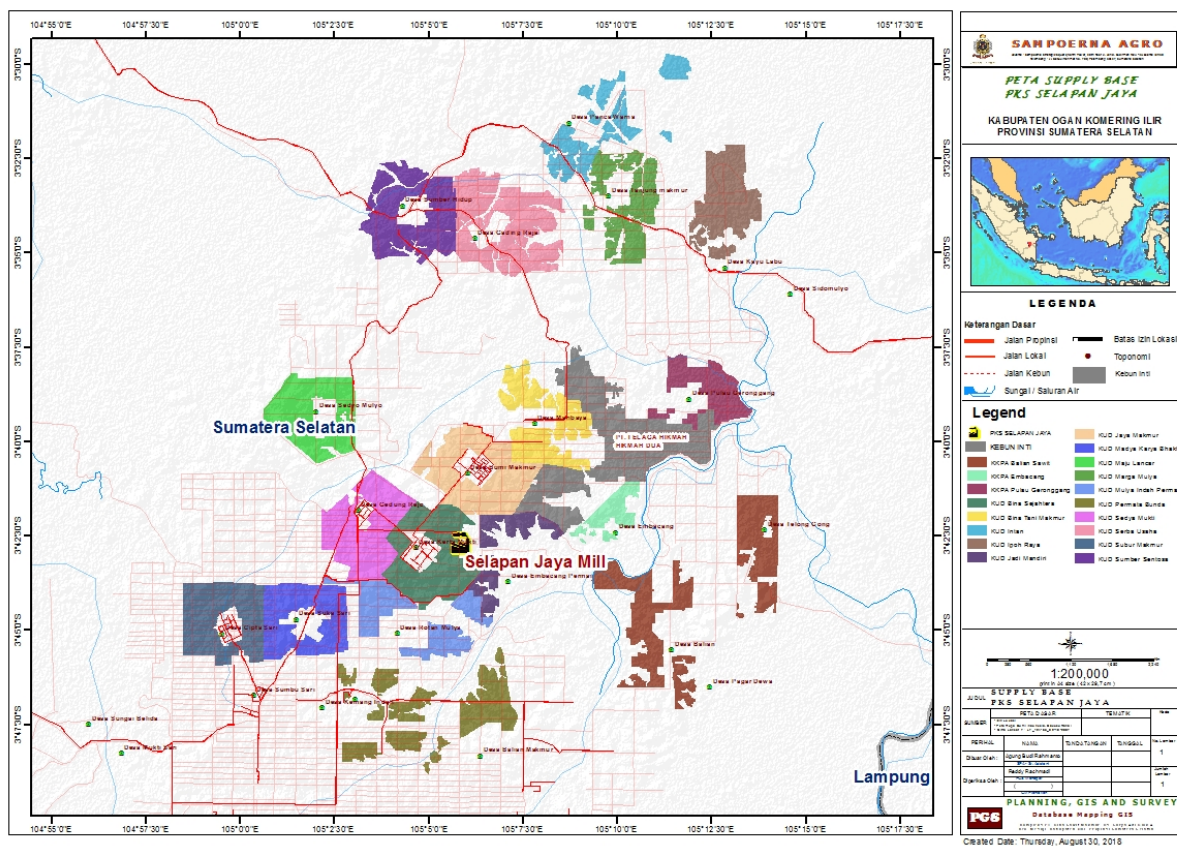


Figure 2. Operational Map of Selapan Jaya Mill- PT Sampoerna Agro



Abbreviations Used

ANDAL	:	Environmental Impact Assessment
ASA	:	Annual Surveillance Assessment
BOD	:	Biological Oxygen Demand
BPD PKS	:	<i>Badan Pengelola Dana Perkebunan Kelapa Sawit</i>
BP N	:	<i>Badan Pertanahan Nasional</i> (National Land Agency)
BP JS	:	<i>Badan Penyelenggara Jaminan Sosial</i>
B3	:	<i>Bahan Berbahaya dan Beracun</i>
CA&L	:	Corporate affair & Legal
CB	:	Certification Body
CH	:	Certificate Holder
CLA	:	Collective Labor Agreement
COVID-19	:	Coronavirus Disease 2019
CSR	:	Corporate Social Responsibility
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CPCL	:	<i>Calon Petani Calon Lahan</i>
CPO	:	Crude Palm Oil
EFB	:	Empty Bunch Press
EHS	:	Environmental Health and Safety
EIA	:	Environment Impact Assessment
FFB	:	Fresh Fruit Bunches
FPIC	:	Free, Prior, Informed, Consent
GHG	:	Green House Gases
GPS	:	Global Positioning System
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha (Land Use Permit)</i>
HPT	:	<i>Hama Penyakit Tanaman</i>
IUCN	:	International Union for Conservation of Nature
KER	:	Kernel Extraction Rate
KUD	:	<i>Koperasi Unit Desa / Village Cooperative Unit</i>
LB3	:	<i>Limbah Bahan Beracun dan Berbahaya</i>
LUCA	:	Land Use Change Analysis
NGO	:	Non-Government Organizations
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
OKI	:	<i>Ogan Komering Ilir</i>
OPT	:	<i>Organisme Pengganggu Tanaman</i>
OSS	:	Online Single Submission
PHL	:	<i>Pekerja Harian Lepas</i>
PIC	:	Person In Charge
PK	:	Palm Kernel
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
R & D	:	Research and Development
RKL	:	<i>Rencana Kelola Lingkungan</i> (Environment Management Plan)
RPL	:	<i>Rencana Pemantauan Lingkungan</i> (Environment Monitoring Plan)
RSPO	:	Roundtable on Sustainable Palm Oil

RTE	:	Rare, Threatened and Endangered
SEIA	:	Social and Environmental Impact Assessment
SIA	:	Social Impact Assessment
SCCS	:	Supply Chain Certification System
SJ	:	Selapan Jaya
SOP	:	Standard Operating Procedure
SPSA	:	<i>Serikat Pekerja Sampoerna Agro</i>
SS	:	<i>Sempadan Sungai (riparian)</i>
TPH	:	<i>Tempat Pengumpulan Hasil</i>
UPDKS	:	<i>Ulat Pemakan Daun Kelapa Sawit</i>
WI	:	Work Instruction
WTP	:	Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT								
1.1	Assessment Standard Used	<ul style="list-style-type: none"> • RSPO Principles & Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 • RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020 							
1.2	Organization Information								
1.2.1	Organization name listed in the certificate	Selapan Jaya Palm Oil Mill, subsidiary of PT Sampoerna Agro, Tbk.							
1.2.2	Contact person	Yusi Rosalina							
1.2.3	Organization address and site address	<ul style="list-style-type: none"> • RSPO registered company: Jl. Basuki Rachmat 788, Palembang, 30128, Sumatra Selatan, Indonesia • Liaison Office: Sampoerna Strategic Square, North Tower, 28/F. Jl. Jenderal Sudirman Kav. 45, Jakarta. Indonesia 							
1.2.4	Telephone	0711-813388							
1.2.5	Fax	0711-811585, 813188							
1.2.6	E-mail	yusi.rosalina@sampoernaagro.com							
1.2.7	Web page address	http://www.sampoernaagro.com							
1.2.8	Management Representative who completed the application for certification	Yusi Rosalina							
1.2.9	Registered as RSPO member	1-0031-07-000-00 (9 January 2007)							
1.3	Type of Assessment								
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: 1 (one) palm oil mill (Selapan Jaya POM under PT Sampoerna Agro), 1 (one) estate under PT Telaga Hikmah (Hikmah Dua Estate) and 11 (eleven) smallholder's estates, i.e.: Village Cooperative Unit or KUD Madya Karya Bhakti, KUD Bina Sejahtera, KUD Sedia Mukti, KUD Maju Lancar, KUD Jaya Makmur, KUD Sumber Sentosa, KUD Serba Usaha, KUD Intan, KUD Marga Mulya, KUD Jadi Mandiri and KUD Bina Tani Mulya.							
1.3.2	Type of certificate	Single							
1.4	Locations of Mill and Plantation								
1.4.1	Location of Mill								
	Name of Mill	Location	<table border="1"> <thead> <tr> <th colspan="2">Coordinate</th> </tr> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>S 03° 42' 27.37"</td> <td>E 105° 05' 49.51"</td> </tr> </tbody> </table>	Coordinate		Latitude	Longitude	S 03° 42' 27.37"	E 105° 05' 49.51"
Coordinate									
Latitude	Longitude								
S 03° 42' 27.37"	E 105° 05' 49.51"								
	Selapan Jaya POM	Kerta Mukti Village, Mesuji Raya Sub District, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia							
1.4.2	Location of Certification Scope of Supply Base								
	Name of Supply Base	Location	<table border="1"> <thead> <tr> <th colspan="2">Coordinate</th> </tr> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> </tbody> </table>	Coordinate		Latitude	Longitude		
Coordinate									
Latitude	Longitude								

	Hikmah Dua Estate	Pulau Geronggang Village, Pedamaran Timur Sub District, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 03° 39' 20.55"	E 105° 09' 42.43"
1	KUD Madya Karya Bhakti (535 SH)	Suka Sari Village, Mesuji Raya Sub District, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 03° 44' 39.3"	E 105° 01' 40.9"
2	KUD Bina Sejahtera (447 SH)	Kerta Mukti Village, Mesuji Raya Sub District, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 03° 42' 50.5"	E 105° 04' 50.05"
3	KUD Sedia Mukti (570 SH)	Gedung Rejo Village, Mesuji Raya Sub District, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 03° 41' 44.3"	E 105° 03' 17.1"
4	KUD Maju Lancar (528 SH)	Sedyo Mulyo Village, Mesuji Raya Sub District, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 03° 39' 06.6"	E 105° 02' 10.8"
5	KUD Jaya Makmur (736 SH)	Bumi Makmur Village, Mesuji Raya Sub District, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 03° 40' 45.2"	E 105° 06' 12.0"
6	KUD Sumber Sentosa (525 SH)	Sumber Hidup Village, Pedamaran Timur Sub District, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 03° 33' 40.7"	E 105° 04' 00.2"
7	KUD Serba Usaha (660 SH)	Gading Raja Village, Pedamaran Timur Sub District, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 03° 34' 31.7"	E 105° 06' 23.2"
8	KUD Intan (471 SH)	Panca Warna Village, Pedamaran Timur Sub District, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 03° 31' 27.9"	E 105° 08' 48.6"
9	KUD Marga Mulya (341 SH)	Tanjung Makmur Village, Pedamaran Timur Sub District, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 03° 54' 03.6"	E 105° 06' 27.8"
10	KUD Jadi Mandiri (292 SH)	Embacang Permai Village, Mesuji Raya Sub District, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 03° 43' 37.6"	E 105° 06' 53.8"
11	KUD Bina Tani Mulya (569 SH)	Maribaya Village, Pedamaran Timur Sub District, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 03° 39' 25.8"	E 105° 07' 26.3"
*Note: Total associate smallholder (SH) scope during re-certification audit assessment is 5,674 smallholders that occupied total area about 11,227.79 ha. Changes in the Scope of Certification due to the reduced number of SH members in each cooperative, the current total number of members in each cooperative refers to the data of cooperative members participating in the BPDPKS fund replanting program.				
1.5	Description of Area Statement			
1.5.1	Tenure			
	• State		3,238.59 Ha	
	• HGU		3,120.00 Ha	
	• HGB		118.59 Ha	
	• Community		11,138.88 Ha	
	• Total		14,377.47 Ha	
*There is change of scope of certification in community (associated smallholder) about 88.91 Ha. Changes due to HCV area which is include in members kavling and some members did not continue join the cooperative because replanting.				

1.5.2	Area Statement							
		Hikmah Dua Estate & Mill (Ha)	Associate Smallholders (ha)	Total (ha)				
	• Total area	3,238.59	11,138.88	14,377.47				
	• Mature area	2,350.79	7,424.16	9,774.95				
	• Immature area	-	3,714.72	3,714.72				
	• Road, bridge	130.08		130.08				
	• Building (emplacement)	13.7	-	13.7				
	• Mill	118.59	-	118.59				
	• Drain, Swamp, River	540.21	-	540.21				
	• Nursery	31.4	-	31.4				
	• Conservation area	53.82	16.32	70.14				
* Conservation area associate smallholders include in planted area								
1.6	Planting Year and Cycles							
1.6.1	Age profile of planting year (part 1)							
	Planting Year	Hectarage (ha)						
		Hikmah Dua Estate	KUD Madya Karya Bakti	KUD Bina Sejahtera	KUD Sedia Mukti	KUD Maju Lancar	KUD Jaya Makmur	
	1994	-	175.42	-	-		127.47	
	1995	1,655.56	367.56	-	-	-	1,121.81	
	1996	249.11	468.90	-	-	-	186.79	
	1997	94.52	-	-	-	-	-	
	2000	-	-	-	-	-	-	
	2001	-	-	-	-	-	-	
	2002	15.00	-	-	-	-	-	
	2005	229.90	-	-	-	-	-	
	2006	43.90	-	-	-	-	-	
	2008	24.00	-	-	-	-	-	
	2011	34.80	-	-	-	-	-	
	2012	4.00	-	-	-	-	-	
	Mature Area	2,350.79	1,011.88	-	-	-	1,436.07	
	2021	-	-	1,128.17	1,020.36	983.88	-	
	Immature Area	-	-	1,128.17	1,020.36	983.88	-	
	TOTAL	2,350.79	1,011.88	1,128.17	1,020.36	983.88	1,436.07	
Age profile of planting year (part 2)								
	Planting Year	Hectarage (ha)						
		KUD Sumber Sentosa	KUD Serba Usaha	KUD Intan	KUD Marga Mulya	KUD Jadi Mandiri	KUD Bina Tani Mulya	Total
	1994	147.24	-	-	-	-	927.12	1,377.25
	1995	814.21	935.86	456.56	119.72	-	211.34	5,682.62
	1996	238.40	280.73	-	73.90	-	-	1,497.83
	1997	-	-	266.29	237.94	-	-	598.75
	2000	-	-	-	75.13	-	-	75.13

	2001	-	-	49.59	38.05	-	-	87.64
	2002	-	-	104.13	-	-	-	119.13
	2005	-	-	-	-	-	-	229.9
	2006	-	-	-	-	-	-	43.9
	2008	-	-	-	-	-	-	24
	2011	-	-	-	-	-	-	34.8
	2012	-	-	-	-	-	-	4
	Mature Area	1,199.85	1,216.59	876.57	544.74	-	1,138.46	9,774.95
	2021	-	-	-	-	582.31	-	3,714.72
	Immature Area	-	-	-	-	582.31	-	3,714.72
	TOTAL	1,199.85	1,216.59	876.57	544.74	582.31	1,138.46	13,489.67
1.6.2	New Planting area after January 2010			38.8 ha				
1.6.3	Planting Cycle			2 nd 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 (%)	
	Selapan Jaya	120	203,838.18	39,969.87	19.61	11,059.10	5.43	
	*Production data source from November 2021 to October 2022							
	**The difference between FFB processed and FFB received (226.61 ton) because the FFB is left for processing the next day (overnight).							
1.7.2	Description of Certification Scope of Supply Base							
	Name of Estate	Total Area (ha)	Production Area (ha)	FFB (tonnes/ year)	Yield (tonnes/ha/ year)	Supplied to Mill		
						FFB (tonnes/ year)	%	
	Hikmah Dua Estate	3,238.59	2,350.79	44,259.05	18.83	44,259.05	100	
	KUD Madya Karya Bhakti (530 SH)	1,011.88	1,011.88	22,453.80	22.19	22,453.80	100	
	KUD Bina Sejahtera (593 SH)	1,128.17	1,128.17	1,162.77	1.03	1,162.77	100	
	KUD Sedia Mukti (570 SH)	1,020.36	1,020.36	386.46	0.38	386.46	100	
	KUD Maju Lancar (528 SH)	983.88	983.88	33.80	0.03	33.80	100	
	KUD Jaya Makmur (736 SH)	1,436.07	1,436.07	41,912.39	29.19	41,912.39	100	
	KUD Sumber Sentosa (525 SH)	1,199.85	1,199.85	5,497.66	4.58	5,497.66	100	
	KUD Serba Usaha (660 SH)	1,216.59	1,216.59	4,249.75	3.49	4,249.75	100	
	KUD Intan (436 SH)	876.57	876.57	5,078.01	5.79	5,078.01	100	
	KUD Marga Mulya (314 SH)	544.74	544.74	4,652.26	8.54	4,652.26	100	
	KUD Jadi Mandiri (302 SH)	582.31	582.31	-	-	-	100	
	KUD Bina Tani Mulya (568 SH)	1,138.46	1,138.46	21,157.80	18.58	21,157.80	100	
	TOTAL	14,377.47	13,489.67	150,843.75	11.18	150,843.75	100	
	* Production data source from November 2021 to October 2022							
1.7.3	FFB description from other source							
	Name of	Type of Organization		Number of	Production	Supplied to Mill		

sources/Organization		smallholders	Area (ha)	FFB (tonnes/year)
KUD Harapan Jaya Mandiri (RSPO non-certified)	Associate Smallholders of PT Telaga Hikmah, Supply base of PT Sampoerna Agro	170	289.00	2,260.40
KUD Ipoh Raya (RSPO non-certified)		517	1,000.95	5,683.61
KUD Balian Sejahtera Abadi (RSPO non-certified)		759	1,364.40	898.71
KUD Puger Mulya (RSPO non-certified)		248	446.40	667.06
Mega Terang Estate (RSPO non-certified)	PT Telaga Hikmah subsidiary of PT Sampoerna Agro, Tbk.	-	2,790.30	76.47
Tanjung Sari Estate (RSPO non-certified)		-	3,873.50	333.82
Gading Jaya Estate (RSPO non-certified)		-	3,243.46	845.10
Hikmah Satu Estate (Certified RSPO)		-	3,752.30	30,953.94
Hikmah Satu Estate (RSPO non-certified)				886.25
Hikmah Empat Estate (Certified RSPO)		-	3,776.10	370.82
Limau Kesturi Estate (RSPO non-certified)		-	6,734.12	279.17
Nawa Surya Estate (RSPO non-certified)		-	9,123.00	108.55
KUD Nawa Surya Puncak Terang (RSPO non-certified)		-	5,032.00	30.71
KUD Sari Makmur (RSPO non-certified)		605	1,275.70	163.81
KUD Tanjung Mesayu (RSPO non-certified)	Associate Smallholder of PT Telaga Hikmah, subsidiary of PT Sampoerna Agro, Tbk.	889	757.24	40.22
KUD Sumber Makmur (RSPO non-certified)		109	627.52	37.10
KUD Permata Indah (RSPO non-certified)	PT Telaga Hikmah subsidiary of PT Sampoerna Agro, Tbk	-	-	10.16
Sepucuk Inti Est. (RSPO certified)		-	1,216.84	10.96
Third party	Independent outgrower	-	-	9,173.1
TOTAL				52,829.96

* 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)	Actual certified product (mt) (Nov 2021 to Oct 2022)
	FFB Processed	200,000	181,103.17
	CPO Production	43,000	35,535.52
	Palm Kernel (PK) Production	10,300	9,806.96

1.8.2	Product selling							
	Type of selling product		Actual selling product period for last year (Nov 2021 to Oct 2022) (mt)					
	CSPO sold as RSPO certified product		2,250.00					
	CSPK sold as RSPO certified product		2,863.44					
	CSPO sold under other scheme		30,976.38					
	CSPK sold under other scheme		0					
	CSPO sold as conventional		0					
	CSPK sold as conventional		6,211.41					
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates		Total Area (ha)	Production Area (ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	Hikmah Dua Estate		3,238.59	2,350.79	46,000	19.57		
	KUD Madya Karya Bhakti (535 SH)		1,011.88	1,011.88	23,300	23.03		
	KUD Bina Sejahtera (447 SH)		1,128.17	1,128.17	0	0.00		
	KUD Sedia Mukti (570 SH)		1,020.36	1,020.36	0	0.00		
	KUD Maju Lancar (528 SH)		983.88	983.88	0	0.00		
	KUD Jaya Makmur (736 SH)		1,436.07	1,436.07	43,300	30.15		
	KUD Sumber Sentosa (525 SH)		1,199.85	1,199.85	5,600	4.67		
	KUD Serba Usaha (660 SH)		1,216.59	1,216.59	4,300	3.53		
	KUD Intan (471 SH)		876.57	876.57	5,500	6.27		
	KUD Marga Mulya (341 SH)		544.74	544.74	5,000	9.18		
	KUD Jadi Mandiri (292 SH)		582.31	582.31	0	0.00		
	KUD Bina Tani Mulya (569 SH)		1,138.46	1,138.46	22,000	19.32		
	TOTAL		14,377.47	13,489.67	155,000	11.49		
	*KUD with 0 Ton FFB production is not produce FFB yet. The production area in KUD Bina Sejahtera, Sedia Mukti, Maju Lancar, and Jadi Mandiri is immature area.							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO Out put (tonnes)	Extraction (%)	Palm Kernel Out put (tonnes)	Extraction (%)	Supply Chain Module
	Selapan Jaya	120	155,000	32,600	20.00	8,500	5.50	MB
	*Projected CSPO and CSPK production for 12 months							
1.9	Other Certifications							
	ISCC			EU-ISCC-Cert-ID215-23190101				
	Other			<ul style="list-style-type: none">ISO 9001:2015 (2020-2023) (16 00 A 14017)ISO 14001:2015 (2020-2023) (08 04 A 14010)ISPO (2020-2025) (TNI-ISPO-L-1409)PROPER Blue (2019/2020). (EU-ISCC-Cert-ID215-23220104)				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)		Time Bound	Location	Status	
	Mill	Time bound						

				Plan			
Belida Mill of PT Aek Tarum		2011	Belida Mill	2011	Sumatera Selatan	Certified	
		2011	Belida Estate	2011	Sumatera Selatan	Certified	
		2016	Permata Bunda Satu Estate	2016		Certified	
		2018	KUD Permata Bunda	2018	Sumatera Selatan	Certified	
		2016	Belida Estate Smallholder				
			• KUD Panca Sawit Makmur	2016	Sumatera Selatan	Certified	
		2017	Limau Sundai Smallholder				
			• KUD Rahayu Bhakti	2017	Sumatera Selatan	Certified	
			2017	• KUD Mulya Jaya		2017	Certified
			2017	• KUD Mekar Sari		2017	Certified
			2017	• KUD Sumber Rezeki		2017	Certified
		2017	Sari Indah Smallholder				
			• KUD Karya Makmur	2017	Sumatera Selatan	Certified	
			2018	• KUD Subur Makmur		2018	Certified
Permata Bunda Jaya Mill of PT Mutiara Bunda Jaya		2016	Permata Bunda Mill	2016	Sumatera Selatan	Certified	
		2016	Mesuji Estate	2016		Certified	
		2016	Surya Adi Estate	2016		Certified	
		2018	Mesuji Smallholder				
			• KUD Citra Sawit Mandiri	2018	Sumatera Selatan	Certified	
		2018	Permata Bunda Smallholder				
			• KUD Marga Mulya	2018	Sumatera Selatan	Certified	
			2018	• KUD Surya Bhakti		2018	Certified
		2018	Harapan Bunda Smallholder				
			• KUD Surya Adi	2018	Sumatera Selatan	Certified	
			2018	• KUD Sinar Jaya		2018	Certified
		2018	Surya Karta Smallholder				
			• KUD Tunas Harapan	2018	Sumatera Selatan	Certified	
		2024	• KUD Bina Sawit Utama	2024	Sumatera Selatan	-	
Sumber Sawit Mill of PT Gunung Tua Abadi		2016	Sumber Sawit Mill	2016	Sumatera Selatan	Certified	
			Sumber Sawit Estate	2016		Certified	
			Inti Permata Bunda Dua Estate	2016		Certified	
			Hikmah Tiga Estate	2017		Certified	
			Hikmah Lima Estate	2017		Certified	
			Hikmah Lima Estate (Extension HGU 2019)	2023		LUCA process	
			Hikmah Lima Estate Smallholder				
		2017	• KUD Dewa Makmur	2017	Sumatera Selatan	Certified	
		2022	Sumber Sawit Estate Smallholder				
			• KUD Makmur Bersama	2023	Sumatera Selatan	-	
			2023	Limau Kesturi Estate		2023	-
			2022	Jaya Permai Estate		2022	-
			2022	Nawa Surya Estate		2022	-
			2022	Puncak Terang Estate		2023	-
2024	KUD Surya Gajah Dewa		2024	-			
2024	KUD Jeruju Bhakti mandiri	2024	-				
2024	KUD Supas Maju Bersama	2024	-				
Selapan Jaya Mill (PT Sampoerna Agro)		2017	Selapan Jaya Mill	2017	Sumatera Selatan	Certified	
		2017	Hikmah Dua Estate	2017		Certified	

		2020	• KUD Jadi Mandiri	2020		Certified
		2018	• KUD Bina Sejahtera	2018		Certified
		2018	• KUD Maju Lancar	2018		Certified
		2018	• KUD Madya Karya Bhakti	2018		Certified
		2018	• KUD Sedyu Mukti	2018		Certified
		2018	• KUD Jaya Makmur	2018		Certified
		2018	• KUD Intan	2018		Certified
		2018	• KUD Marga Mulya	2018		Certified
		2018	• KUD Bina Tani Mulya	2018		Certified
		2018	• KUD Sumber Sentosa	2018		Certified
		2018	• KUD Serba Usaha	2018		Certified
		2024	• KUD Puger Mulya	2024		-
		2024	• KUD Harapan Jaya Mandiri	2024		-
		2024	• KUD Balian Sejahtera Abadi	2024		-
		2024	• KUD Ipoh Raya	2024		-
		2018	Telaga Hikmah Mill	2018		Certified
		2018	Hikmah Satu Estate	2018		Certified
		2019	Hikmah Empat Estate	2019		Certified
		2021	Gading Jaya Estate	2021		-
		2021	Mega Terang Estate	2021		-
		2021	Tanjung Sari Estate	2021		-
		2021	Sepucuk Estate	2021		-
		2024	• KUD Permata Indah	2024		-
		2023	• KUD Tanjung Mesayu	2023		-
		2023	• KUD Sumber Makmur	2023		-
		2023	• KUD Sari Makmur	2023		-
		2025	• KUD Sanjaya Cita Mandiri	2025		-
		2023	Sungai Rangit Mill	2024		LUCA Process
		2023	Baboti Estate	2024		LUCA Process
		2023	Rauk Naga Estate	2024		LUCA Process
		2023	Waringin Estate	2024		LUCA Process
		2023	Sukamara Estate	2024		LUCA Process
		2023	Telaga Bintang Estate	2024		LUCA Process
		2023	Sungai Sagu Estate	2024		LUCA Process
		2025	KUD Pasir Subur Sampoerna	2025		
		2025	KUD Sawit Mukti Jaya	2025		
		2025	KUD Mulya Jaya	2025		
		2027	KUD Patih Payung Sejahtera	2027		
		2026	Poktan I – XXVIII	2026		
		2027	Mitra Terpadu I – III	2027		
		2024	Sahara Estate	2024		
		2025	KUD Usaha Tani Sejahtera	2025		-

	Usaha Agro Indonesia Mill of PT Usaha Agro Indonesia	2018	Usaha Agro Indonesia Mill	2018	Kalimantan Barat	Certified
		2018	Ulin Agro Estate	2018		Certified
		2018	Kruing Agro Estate	2018		Certified
		2018	Meranti Agro Estate	2018		Certified
		2021	Permit location-2 (2,500 ha)	2021		Certified
		2022	Permit location-3(2,283 ha)	2025		NPP process Land title has not HGU yet
		2021	KOBBUN Jambi Mekar Jaya Sempurna (JMJS)	2021		Certified
		2021	KOBBUN Sempurna Mandiri (SM)	2021		Certified
		2022	KOBBUN Sempurna Bersatu (SB)	2025		Land title process
		2025	PT Anugerah Palm Indonesia (Gaharu Palm Estate)	2025		-
		2027	PT Anugerah Palm Indonesia Gaharu Estate Smallholder	2027		-
	Lanang Agro Bersatu Mill of PT Lanang Agro Bersatu	2023	Lanang Agro Bersatu Mill	2024	Kalimantan Barat	LUCA process
		2023	Bukit Subur Estate	2024		LUCA process
		2023	Bukti Makmur Estate	2024		LUCA process
		2023	Lanang Agro Bersatu Smallholders	2023		-
		2025	KOBBUN Bina Bersama	2025		
		2025	KOBBUN Mitra Peruye Bersatu	2025		
		2025	KOBBUN Dara Kaba	2025		
	Landak Area (Wilayah 1)	2024	PT Tebar Tandan Tenerah (Gunung Tenerah Estate)	2025	Kalimantan Barat	POM not yet build
		2026	KOBBUN Usaha Ane Laki	2026		-
		2026	KOBBUN Usaha Tandan Hidup	2026		-
		2024	PT Nusantara Sarana Alam (Gunung Alam Estate)	2025		POM not yet build
		2026	KOBBUN Biki Diri Maju	2026		-
		2026	KOBBUN Panamukang Sagauh Raya	2026		-
		2024	Kedurang Prakarsa Nabati Estate	2025		POM not yet build
		2026	PT Kedurang Prakarsa Nabati Smallholders	2026		-
	Landak Area (Wilayah 2)	2024	PT Pertiwi Agro Sejahtera (Gunung Sejahtera Estate)	2024	Kalimantan Barat	-
		2026	KOBBUN Sawit Enen Mampui	2026		-
		2024	PT Kusuma Mentari Makmur (Gunung Mentari Estate)	2024		-
		2026	KOBBUN Binua Aek' Ayak	2026		-
		2024	PT Agro Planindo Utama (Gunung Utama Estate)	2024		-

	2026	KOBBUN Saripan Ayunkg Apu	2026	-																																																																																	
<ul style="list-style-type: none">• The TBP endorsed by the CEO on 10 January 2022.• As announced by RSPO through email dated 22 August 2019 about requirement for growers on TBP and uncertified management units, it has mentioned that as a minimum, all estates and mills shall be certified within five years after obtaining RSPO membership. Any new acquisitions shall be certified within a three-year timeframe. Any deviations from these maximum periods requires approval by RSPO Secretariat. Since the RSPO Certification System document was made effective from 01 July 2018, existing RSPO members have 5 years from this date to comply with these requirements. This means any grower member with management unit(s) that have not yet been certified will need to ensure that the uncertified management unit(s) are certified by 30 June 2023.• Regarding the matter above, un 16 December 2022 Sustainability Department informed RSPO via email about update of Sampoerna Agro TBP certification. As response by RSPO via email on 6 January 2023, it has mentioned that by responding to unit of certification request, RSPO have reviewed the revised Time bound Plan (TBP) and can provide an approval. <p>The revision of time bound plan because there is the change of certification time plan for uncertified management units, reduction of supply base and extension of supply base with details:</p> <ol style="list-style-type: none">1. Reduction of supply base: KUD Mulya Indah Permai because has terminate the agreement.2. Add estate name in subsidiaries:<ol style="list-style-type: none">a) Gaharu Palm Estate, supply to PT Anugrah Palm Indonesia Estateb) Gunung Tenerah Estate, supply to PT Tebar Tanda Tenerah Estatec) Gunung Alam Estate, supply to PT Nusantara Sarana Alam Estated) Gunung Sejahtera Estate, supply to PT Pertiwi Agro Sejahtera Estatee) Gunung Mentari Estate, supply to PT Kusuma Mentari Makmur Estatef) Gunung Utama Estate, supply to PT Agro Planindo Utama Estate3. Change of time line for uncertified unit:																																																																																					
<table><tr><th>Unit</th><th>Previous TBP</th><th>Revision TBP</th><th>Justification</th><th>Mill</th></tr><tr><td>KUD Bina Sawit Utama</td><td>-</td><td>2024</td><td>New agreement</td><td>Permata Bunda Mill</td></tr><tr><td>Hikmah Lima Estate (HGU extension in 2019)</td><td>2020</td><td>2023</td><td>On process to install HGU boundaries</td><td rowspan="6">Sumber Sawit Mill</td></tr><tr><td>KUD Makmur Bersama</td><td>2020</td><td>2023</td><td>Infrastructure not yet appropriate LUCA process</td></tr><tr><td>Limau Kesturi Estate</td><td>2020</td><td>2023</td><td>LUCA process</td></tr><tr><td>Jaya Permai Estate</td><td>2020</td><td>2022</td><td>LUCA process</td></tr><tr><td>Nawa Surya Estate</td><td>2020</td><td>2022</td><td>LUCA process</td></tr><tr><td>Puncak Terang Estate</td><td>2020</td><td>2023</td><td>LUCA process</td></tr><tr><td>KUD Mulya Indah Permai</td><td>2020</td><td>-</td><td>Terminate agreement</td><td rowspan="5">Selapan Jaya Mill4</td></tr><tr><td>KUD Puger Mulya</td><td>2020</td><td>2024</td><td rowspan="4">- KUD Financial not yet stable - LUCA process</td></tr><tr><td>KUD Harapan Jaya Mandiri</td><td>2020</td><td>2024</td></tr><tr><td>KUD Balian Sejahtera Abadi</td><td>2020</td><td>2024</td></tr><tr><td>KUD Ipoh Raya</td><td>2020</td><td>2024</td></tr><tr><td>Gading Jaya Estate</td><td>2019</td><td>2021</td><td rowspan="7">LUCA process</td><td rowspan="7">Telaga Hikmah Mill</td></tr><tr><td>Megaterang Estate</td><td>2021</td><td>2021</td></tr><tr><td>Tanjung Sari Estate</td><td>2019</td><td>2021</td></tr><tr><td>Mega Terang Smallholder</td><td>2021</td><td>2024</td></tr><tr><td>KUD Tanjung Mesayu</td><td>2020</td><td>2023</td></tr><tr><td>KUD Sumber Makmur</td><td>2020</td><td>2023</td></tr><tr><td>KUD Sari Makmur</td><td>2020</td><td>2023</td></tr><tr><td>Sungai Rangit POM</td><td>2021</td><td>2024</td><td></td><td>Sungai Rangit Mill</td></tr></table>					Unit	Previous TBP	Revision TBP	Justification	Mill	KUD Bina Sawit Utama	-	2024	New agreement	Permata Bunda Mill	Hikmah Lima Estate (HGU extension in 2019)	2020	2023	On process to install HGU boundaries	Sumber Sawit Mill	KUD Makmur Bersama	2020	2023	Infrastructure not yet appropriate LUCA process	Limau Kesturi Estate	2020	2023	LUCA process	Jaya Permai Estate	2020	2022	LUCA process	Nawa Surya Estate	2020	2022	LUCA process	Puncak Terang Estate	2020	2023	LUCA process	KUD Mulya Indah Permai	2020	-	Terminate agreement	Selapan Jaya Mill4	KUD Puger Mulya	2020	2024	- KUD Financial not yet stable - LUCA process	KUD Harapan Jaya Mandiri	2020	2024	KUD Balian Sejahtera Abadi	2020	2024	KUD Ipoh Raya	2020	2024	Gading Jaya Estate	2019	2021	LUCA process	Telaga Hikmah Mill	Megaterang Estate	2021	2021	Tanjung Sari Estate	2019	2021	Mega Terang Smallholder	2021	2024	KUD Tanjung Mesayu	2020	2023	KUD Sumber Makmur	2020	2023	KUD Sari Makmur	2020	2023	Sungai Rangit POM	2021	2024		Sungai Rangit Mill
Unit	Previous TBP	Revision TBP	Justification	Mill																																																																																	
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Sungai Rangit POM	2021	2024		Sungai Rangit Mill																																																																																	

	Baboti Estate	2021	2024	LUCA process and legality issue	
	Rauk Naga Estate	2021	2024		
	Waringin Estate	2021	2024		
	Sukamara Estat	2021	2024		
	Telaga Bintang Estate	2021	2024		
	Sungai Sagu Estate	2021	2024		
	Sungai Rangit Smallholder	2021	2025		
	Location permit 2,283 Ha	2020	2025	Land title still on process	Usaha Agro Indonesia Mill
	Kopbun Sempurna Bersatu	2020	2025		
	Lanang Agro bersatu Mill	2020	2024	LUCA process	Lanang Agro Bersatu Mill
	Bukit Subur Estate	2020	2024		
	Bukit Makmur Estate	2020	2024		
	Lanang Agro Bersatu	2022	2023		
	Gunung Tenerah Estate	2024	2025	POM not yet build	-
	Estate Gunung Alam	2024	2025	POM not yet build	-
	Estate Kedurang Prakarsa Nabati	2024	2025	POM not yet build	-
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard				
	The smallholders associated with PT Sampoerna Agro has been include as Certification Scope and the others smallholder are in progress to certification				

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.1	<p>1. Rizliani Aprianita Hsb (Lead Auditor). Indonesian Citizen. Bachelor and Magister of Agribusiness, Faculty of Agriculture. She had followed training such as RSPO Lead Auditor Training, SCCS training, lead Auditor ISO 9001:2008, ISO 14001:2004, SA 8000, Social Audit Training, ISPO Auditor training, OHSAS 18000 and followed several IHT related to environment, BMP etc. She has been involved in several audit activities related to sustainable palm oil certification since 2015 covering social aspect, health and safety aspect, worker welfare and waste management aspect. During the assessment she assigned to verified worker welfare, transparency and social.</p> <p>2. Asystasya Aishah Silalahi (Auditor). Indonesia Citizen, Bachelor of Economy, Major of Agribusiness, Faculty of Economic and Management. She has one-year experience in consultancy. She has followed training such as ISPO Auditor Training, Lead Auditor ISO 9001:2015, OHS General Expert, RSPO lead auditor training course, SCCS, and several in house training related to environmental, BMP, SA 8000. Has been involved in several audit activities since 2016 related to sustainable palm oil certification covering waste management aspect, Social Aspect, Health and Safety Aspect, and Worker Welfare. During the assessment she assigned to verified Legal, Land Dispute and SCCS</p> <p>3. Radytio Puspanjana (Auditor). 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 GMT, 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. Since 2015 has been following many audits as auditor base on Best Management Practice and Environment. Currently working for an independent certification body. During this audit, he verifies Environment, GHG and HCV aspects.</p> <p>4. Firda Tarunajaya (Auditor). Indonesian citizen, graduated in 2010 from the Department of Silviculture, Faculty of Forestry, Bogor Agricultural Institute. He has working experienced as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The training he has followed namely: Lead Auditor RSPO, Lead Auditor ISPO, Quality Management Systems (ISO 9001:2015) by IRCA, Environmental Management Systems (ISO 14001:2015), ISO 19011:2018, ISO 17021:2011 and ISO 17065:2012. During this assessment, he performed as Auditor and verified BMP and OHS aspect.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1.1	<p>Number of auditors: 4 auditors</p> <p>Number of days for ASA-1.1 at site: 5 days</p> <p>Number of working days for ASA-1.1 at site: 20 Working days</p>
2.2.2	Assessment Process
ASA-1.1	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Sampoerna Agro Tbk – Selapan Jaya Mill to the requirements of RSPO Principles & Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Some opportunities for improvement of the results Surveillance-1.1 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (Surveillance-1.2).</p> <p>Improvement of findings from previous audit findings were observed by auditors at this Surveillance assessment. All</p>

information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **Surveillance**.

The opening meeting was held on Monday November 21st, 2021 in client area through combination of direct. As for the participants who attended the opening meeting included the Estate Manager, Mill Manager, GM for smallholder area, sustainability department and other relevant staff. While the closing meeting will take place on Friday November 25th, 2022. The auditor team can conduct field observation for 3 days and field observation is conducted on Tuesday to Thursday. In general, the audit activities went smoothly with good support from the unit management and there is no grievance or appeal during the audit. The presentation of documents is presented quite well using email or google drive.

There has been a change in the number of farmers and the scope of certification, because since 2021 – 2022 the replanting program will begin with the assistance of BPDPKS replanting funds. As for each cooperative that is the scope of the audit, not all cooperative members participate in the replanting program. For farmers who do not participate in the management replanting program – sales are made privately.

The assessment program please find Appendix 2

2.2.3	Locations of Assessment
ASA-1.1	<p>Number of units in this certification activity is 1 (one) Mill, 1 (one) Own Estates and 11 KUD. The auditor team used the $(0.8\sqrt{y}) \times (z)$ formula to determine the units sampling to be focused on and also considered the issues raised by stakeholder, (y) is the number of estate and (z) multiplier defined by the risk assessment. The risk for this assessment is low due to the area is geographic locations, distance of estate, complexity of labor, landscape setting, presence of HCV, number of communities/ conflicts and legality. Based on this formula, the auditor team determined that the sampling locations are one palm oil mill (Selapan Jaya POM), one estate (Telaga Hikmah Dua Estate) and KUD Bina Tani Mulya, KUD Marga Mulya, KUD Sedia Mukti & KUD Bina Sejahtera</p> <p>Location that visited consist of: Selapan Jaya Mill (November 22nd, 2022)</p> <ul style="list-style-type: none"> • Security post. Observation and Interview related to work procedure, emergency response, worker welfare, OHS implementation in mill, and supply chain aspect. • Weighbridge station. Observation and Interview related to supply chain aspect and worker welfare. • Grading station. Observation and Interview related to work procedure, emergency response, worker welfare, and OHS implementation in mill. • Mill Drainage. Observations mill effluent lines, sanitation mill and flow of leaching mill. • Solid Waste. Observation of the management of Solid waste consist of EFB, fiber and shell from the production process of mill. • WWTP and outlet POME disposal point. Field observations related to Ban to entry to WWTP, run off, testing of effluent and potential contaminant. • Biogas Plant. Observation and interview related to POME utilization for methane capture plant with engine capacity. • WTP. Observations and interviews related to water management, recording of water use, health checks, PPE and waste management. • Hazardous Waste Storage. Observation and interview related OHS, material handling, and hazardous waste management. • Chemical Storage. Observation and interview related to management of agrochemical material and waste, MSDS, emergency response facilities, OHS and the types of agrochemicals used. • Processing station (sterilizer – kernel station). Observation and interview workers about OHS implementation, worker welfare, emergency response. • Boiler station. Observation and interview workers about OHS implementation, worker welfare, emergency response • Engine room. Observation and interview workers about OHS implementation, worker welfare, emergency response.

Hikmah Dua Estate of PT Telaga Hikmah (November 22nd, 2022)

- **Division 1 Block 19A 19B 21B 20D.** Observation to harvesting activities and interview with Foreman and 7 Harvester, on their understanding towards technical, environment, safety and manpower aspect, as well as facilities provided by company management.
- **Division 1 Block 15.** Observation to Beneficial Plant *Turnera subulate*
- **Division 1 Block 20C.** Observation to Barn Owl Box
- **Division 1 Block 21A 21B Block 25.** Observation to EFB Application
- **Division 1 Block 15C.** Observation *Land Cover Crops*
- **HGU stakes and land demarcation No. 77 (block 31 A), No. 71 (block 32 B), and No. 72 (block 32 B).** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **Occupied area Block 33 B.** Observation to occupied area by community of Macang Permai Village which already planted by rubber tree (*Hevea brasiliensis*) and clearly separated by road.
- **HCV Swamp Area, Block 33 C.** Observation the implementation of management in HCV of forest and swamp area.
- **Domestic Waste Landfill, Block 16 C.** Observation on domestic waste management.
- **Fertilizer Warehouse.** Observation and interview for material handling, OHS implementation, and hazardous material handling.
- **Chemical Storage.** Observation and interview related to work procedure, management of agrochemical material and waste, MSDS, emergency response facilities, OHS implementation and the types of pesticides used.
- **Hazardous Waste Storage.** Observation and interview related OHS implementation, material handling, and hazardous waste management.
- **Material Storage.** Observation and interview related material handling and PPE stock.
- **Workshop.** Observation and interview related to work procedure, OHS implementation, waste management and worker welfare aspect.
- **Puskeshun.** Observation dan interview related to emergency response, medical facility, work accident, waste management and medical checkup.
- **Housing complex and Facilities.** Observation and interview regarding facilities and infrastructure

KUD Bina Sejahtera (November 23rd 2022)

- **Fertilizer Storage.** Observation of fertilizer management and interview related to procedure and worker welfare.
- **Hazardous waste storage.** Observation of hazardous waste management and interview related to procedure and worker welfare
- **Cleaning house.** Observation about cleaning house condition.
- **Pesticide storage (1 warehouse staff).** Observation about storage condition and pesticide stock and interview with worker about worker welfare, waste management, OHS implementation.
- **Kavling 1,339, Farmer Group 57 (5 employment and 2 foreman).** Observation and interview with employment and foreman related *kastrasi*, safe working practices and also worker welfare
- **Workshop.** Observations related to management and implementation of health safety, and social worker
- **Room rinse of pesticide applicators.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.

KUD Marga Mulya (November 22nd 2022)

- **Fertilizer Storage.** Observation of fertilizer management and interview related to procedure and worker welfare.
- **Hazardous waste storage.** Observation of hazardous waste management and interview related to procedure and worker welfare
- **Cleaning house.** Observation about cleaning house condition.
- **Pesticide storage (1 warehouse staff).** Observation about storage condition and pesticide stock and interview with worker about worker welfare, waste management, OHS implementation.
- **PPE Storage.** Observation about storage condition and stock PPE
- **Secretariat office.** Interview with 4 Harvester, on their understanding towards technical, environment, safety and manpower aspect, as well as facilities provided by company management.

- **Boundaries for group 41.** Field observations related to plot boundaries.
- **HCV areas for group 41.** Observations and interviews related to management of HCV areas

KUD Sedia Mukti

- **Boundary stakes of Kavling 14 KT 3, Kavling 519 KT 23 and Kavling 102 KT 2.** Observation of legal boundary.
- **HCV riparian area Kali Ijo river, Kavling 519 (out of RSPO scope).** Observation the implementation of management in HCV of forest and swamp area.
- **HCV riparian area Tonjong river, Kavling 102 (out of RSPO scope).** Observation the implementation of management in HCV of forest and swamp area.
- **PPE warehouse and Mixing Area.** Observation and interviews related to washing of working tools, PPE spray teams and used pesticide containers handling.
- **Fertilizer Warehouse.** Observation and interview for material handling, OHS, and hazardous material handling
- **Hazardous Waste Storage.** Observation and interview related OHS implementation, material handling, and hazardous waste management.
- **Chemical Storage.** Observation and interview related to management of agrochemical material and waste, MSDS, emergency response facilities, OHS implementation and the types of pesticides used.
- **Secretariat office.** Interview with spraying and manuring workers related to work procedure, employment, OHS implementation and compliant mechanism.

KUD Bina Tani Mulya

- **Boundary stakes of Kavling number 350 until 355 KT 11.** Observation of legal boundary.
- **PPE warehouse and Mixing Area.** Observation and interviews related to washing of working tools, PPE spray teams and used pesticide containers handling.
- **Fertilizer Warehouse.** Observation and interview for material handling, OHS, and hazardous material handling
- **Hazardous Waste Storage.** Observation and interview related OHS implementation, material handling, and hazardous waste management.
- **Chemical Storage.** Observation and interview related to management of agrochemical material and waste, MSDS, emergency response facilities, OHS implementation and the types of pesticides used.
- **HCV areas.** Observations and interviews related to management of HCV areas.
- **Harvesting for group 35.** Observation and interview related to work procedure, OHS implementation and employment.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1.1	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Sampoerna Agro was held by:</p> <ul style="list-style-type: none"> • Public Notification on website PT Mutuagung Lestari on November 07th, 2022 • Public consultation with NGO via questioner email on November 15rd, 2022 • Public consultation meeting with government institution on 22nd to 23rd November 2022 • Public consultation meeting with surrounding community including previous land owner on 23rd November 2021 • Public consultation meeting with internal stakeholders and contractor 21st to 23rd November 2021 <p>Numbers of input from stakeholders were clarified by PT Sampoerna Agro</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit ASA-1.2 will be conducted eight (8) months to twelve (12) months after date of annual license.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Selapan Jaya POM – PT Sampoerna Agro, Tbk. operation consisting of one (1) mill, one (1) oil palm estate and eleven (11) associate smallholder cooperatives.

During the assessment, there was Four (4) Nonconformity were assigned against Major Compliance Indicators; one (1) Nonconformity were assigned against Minor Compliance Indicators and five (5) 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.

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 action) that had been reviewed and accepted by Auditors in form of documentation evidences e.g. (document record/photographic/etc...). Those corrective actions taken that consist of Four (4) Major non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Selapan Jaya POM – PT Sampoerna Agro Tbk complied with the requirements of **RSPO Principles & Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.**

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1	The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1	<p>Company has shown a list of information available in KUD and PT Telaga Hikmah for 2022. There are documents that are general, internal, and limited. Public documents are documents that can be accessed by all parties, internal documents are documents that are allowed to be accessed only by internal parties (supervisory bodies, management, employees, and KUD members), and limited documents are documents that can be accessed after obtaining approval from the management. Several documents that can be accessed publicly include deed of establishment, land rights of KUD members, company land rights, company registration certificates, areal statement data, environmental documents, HCV reports, SIA documents, and other documents.</p> <p>Procedure related to the 4th revision of communication dated 1 August 2019. The revision is related to the addition of references and the addition of a flowchart of complaints to the RSPO for any complaints that cannot be resolved through the company's management. Person in charge: unit head, human resources & services, sustainability unit. Procedures related to external communication can be conveyed orally and in writing, types of documents that can be accessed by the public, internal communication, internal and external complaint resolution, external can be done with mediation from third parties and through the RSPO complaint mechanism. The list of stakeholders is updated once a year.</p> <p>KUD and company communication and consultation procedures are based on the document SA-PLASMA-PP-CA&L-01 dated 1 April 2017 and SOP No. P-SAG-HA-CA&L-08 Revision 2 dated February 1, 2016. Certification unit shows a management decision regarding the appointment of a communication officer. The appointment letter determines the appointment of a communication officer and their main tasks, for example: receiving all forms of communication, explaining to the party wishing to communicate about communication procedures, recording all forms of responses and answers</p>	

from all communication processes, and so on.

1.1.2

Company has provided information to stakeholder through submission of mandatory report to related agency, such as:

- Land use report for 2021 reported to Land National Office of Ogan Komering Ilir regency.
- The RKL-RPL Report for Semester 1 of 2022, electronic receipt number 1652410763-4021 and Environmental Service of Ogan Komering Ilir Regency, the last report was carried out on October 07, 2022.

Based on interview with related agency in Ogan Komering Ilir Regency, it is known that company has submitted the mandatory report periodically.

1.1.3

KUD, estate, and mill have shown records of incoming letters from stakeholders documented in the Logbook/Incoming Mail Agenda. The document explains the letter number, date of receipt, and purpose/purpose of the letter. Letters that come to each majority unit are related to notifications of visits from both the agency and other stakeholders. For example, as follows.

- Incoming letter from the Ogan Komering Ilir Regency Plantation Agency dated July 18, 2022 regarding the notification of a visit to PT Sampoerna Agro
- Incoming letter from Kerta Mukti Village that entered PKS Selapan Jaya on 12 July regarding a request for financial assistance for the 17 August celebration and has been followed up on 12 August 2022

Based on interviews with representatives of Embacang, Maribaya, and Pulau Geronggang Village, it is known that the company has conducted outreach to the village regarding the mechanism for requesting information from the company. If there is a request for information, the village will send a letter to the company and the company will respond.

1.1.4

Company has procedure for Request and Information Response SA-PLASMA-PP-CA&L-01 dated 1 April 2017 and SOP No. P-SAG-HA-CA&L-08 Revision 2 dated February 1, 2016. The procedure explain the mechanism for communication and consultation with stakeholder. Based on interview with representative of Embacang, Maribaya, and Pulau Geronggang Village, it is known that they understand the mechanism for consultation and communication with company. The consultation and communication can be done verbally or write and submit letter to company.

1.1.5

Certification unit shows a list of stakeholders for estate units, mill and KUD. List of stakeholders has informed name of stakeholder, address, and contact person of stakeholders. From the document, the following are details of the stakeholders of each unit, for example:

- Hikmah Dua Estate: district agencies (11 stakeholders), sub-district agencies (3), village government (14), internal stakeholders (3), villages (3)
- KUD Bina Sejahtera: external stakeholders (32), internal stakeholders (17)
- KUD Bina Tani Mulya: external stakeholders (31), internal stakeholders (16)

Based on the list, the transporter for hazardous waste is still not included in the list. Therefore, certification unit has the opportunity to complete the stakeholder list for all third parties who work with estate, KUD, and POM, for example Hazardous and Toxic Waste transporters (Opportunity for Improvement).

Status: Comply

1.2

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

1.2.1

The company has a PT Sampoerna Agro Tbk Sustainability Policy which was signed by the CEO on October 1, 2019. The policy describes the company's commitments, namely:

- To act with integrity and ethical behavior in all transactions and business operations in accordance with The Sampoerna Way. Comply with fair and proper business practices, prohibit all forms of corruption and other violations, and ensure transparency of information in accordance with applicable regulations.

- To fulfill all customer requests, as well as legal and regulatory requirements, which have been ratified and applicable in all levels: local, national, and international.
- To uphold safety, orderliness, and harmonious relationships in all plantation business activities, by putting forward consultation with stakeholders, as well as prohibiting all illegal forms of intimidation, and violence.
- To respect and uphold human rights, including the right of employees to form labor unions and discuss issues collectively. We neither discriminate based on race, ethnicity, nationality, religion, physical disabilities, gender, sexual orientation, membership in labor unions, political affiliations, nor age. No forced nor illegal labor. To respect human rights activists.
- To protect female employees at workplace by strongly prohibiting any sexual harassment and violence towards them, as well as protecting their reproduction rights. We do not employ underaged children and we do facilitate child care.
- To consistently deliver superior and environmentally friendly products while promoting customer satisfaction.
- To strive in preventing pollution to the environment.
- To prevent occupational accidents and sicknesses that may result from unsafe working conditions and activities.
- To fulfil SNI standards in laboratory management system under ISO/IEC 17025:2017 as well as ensure laboratory facilities are adequate.
- To enforce zero burning in our land clearing activities and prohibit land clearing activities in environmentally protected areas, High Conservation Value (HCV) areas, peatlands, and forest with High Carbon Stock (HCS).
- To carry out continuous improvement in terms of quality, environment, occupational health and safety, as well as product security.

Besides that, KUD also has a Commitment and Policy. For example, for KUD of Bina Tani Mulya which was signed by Head of KUD on March 8, 2021 and for KUD Marga Mulya was signed on January 14, 2022. The policy describes the company's commitments, namely:

- To act with integrity and ethical behavior in all transactions and business operations in accordance with The Sampoerna Way. Comply with fair and proper business practices, prohibit all forms of corruption and other violations, and ensure transparency of information in accordance with applicable regulations.
- To fulfill all customer requests, as well as legal and regulatory requirements, which have been ratified and applicable in all levels: local, national, and international.
- To uphold safety, orderliness, and harmonious relationships in all plantation business activities, by putting forward consultation with stakeholders, as well as prohibiting all illegal forms of intimidation, and violence.
- To respect and uphold human rights, including the right of employees to form labor unions and discuss issues collectively. We neither discriminate based on race, ethnicity, nationality, religion, physical disabilities, gender, sexual orientation, membership in labor unions, political affiliations, nor age. No forced nor illegal labor. To respect human rights defender.
- To protect female employees at workplace by strongly prohibiting any sexual harassment and violence towards them, as well as protecting their reproduction rights. We do not employ underaged children and we do facilitate child care.
- To consistently deliver superior and environmentally friendly products while promoting customer satisfaction.
- To prevent occupational accidents and sicknesses that may result from unsafe working conditions and activities.
- To strive in preventing pollution to the environment and to do new development by zero burning, and manage HCV area, peat land and HCS forest and also flora and fauna.
- To act sustainable towards quality, environment, OHS, and product safety aspects.

Company also has socialized ethical behavior for example Socialization on April 11, 2022 to contractor. Based on interview with stakeholder such as workers and contractor known that company has socialized ethical behavior.

1.2.2

The company has a violation reporting policy of PT Sampoerna Agro Tbk which was ratified by the President Director on September 27, 2013. The purpose of this policy is as a concrete manifestation that the company group upholds accountability and transparency as well as a concrete effort to improve the quality of plantation company governance, which is good for supporting the business activities of the group company. This policy explains the Whistle Blowing System (WBS), which is a violation reporting system that is part of the group's internal control system in preventing violation and fraudulent practices and to strengthen the implementation of good corporate governance.

All reports must be submitted to the WBS team by electronic mail or written letter:

- If submitted by electronic mail or email, the report is addressed to: complaints@sampoernaagro.com
- If submitted by mail (in a closed envelope), which is marked as Private and strictly confidential: complaint from SGRO PT Sampoerna Agro Tbk. Sampoerna Strategic Square North Tower, 28th floor Jl. Jend. Sudirman Kav. 45 Jakarta 12930, Indonesia.

Besides that, to monitor compliance with ethical policies is carried out through internal audit and monitoring complaints. From the results of the verification of the complaint document and interview with management and stakeholders known that there were no complaints related to violations of ethical behavior.

In addition, the company also routinely conducts internal audits every year covering aspects of the RSPO including ethical behavior. And from the results of the internal audit conducted, there is no indication of a violation of ethical behavior.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

2.1

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

2.1.1

Unit of certification shows several laws and/or regulation pursuance evidence in legal aspect, explained as follows:

Legal Aspect

Hikmah Dua Estate of PT Telaga Hikmah and Selapan Jaya Mill of PT Sampoerna Agro

- Unit of certification has **location permit** as presented in document Decree of Sumatera Selatan Governor No. 784.a/SK/II/1993 dated 18 October 1993 about location permit for PT Telaga Hikmah (Hikmah Dua Estate) for area covers **± 10,000.00 ha** where situated in Mesuji Sub District, Ogan Komering Ilir District (OKI).
- Unit of certification has two (2) **plantation business permit (IUP)** for oil palm plantation and oil palm processing as presented in the following OKI Regent Decrees:
 - Decree No. 324/KEP/D.PERKE/2011 dated 24 August 2011 appointed to PT Telaga Hikmah for oil palm plantation in area covers **16,588.93 ha**.
 - Decree No. 221/Kep/D.Perke/2010 appointed to Selapan Jaya Mill of PT Sampoerna Agro for oil palm plantation in area covers 3,243.46 ha and oil palm processing mill at building land title (HGB) **118.595 ha** wit processing capacity **120 ton FFB/hour**.
- Unit of certification has **Land Title (HGU)** for Hikmah Dua Estate of PT Telaga Hikmah and **Building Land Title (HGB)** for Selapan Jaya Mill of PT Sampoerna Agro for total area covers **3,120.00 ha** and **118.595 ha**, respectively, summarized as follows:
 - Decree of BPN Head No. 20/HGB/BPN/2001 dated 27 July 2001 about HGB for PT Selapan Jaya (Selapan jaya Mill) for area covers 1,185,950 m². From this decree, issued HGB Certificate No. 01 dated 17 September 2001 for area covers 1,185,950 m² (or about **118.595 ha**) that valid for 30 years, or up to 16 September 2031.
 - Decree of BPN Head No. 02/HGU/BPN/2004 dated 07 January 2004 about HGU) of PT Telaga Hikmah for area covers 7,175.60 ha. From this decree, issued three Certificates, which certificate included on the scope of certification has shown through of HGU Certificate No. 07 dated 13 January 2004 for area covers **2,994.00 ha** that valid for 35 years, or up to 12 January 2039.
 - Decree of BPN Head No. 01/HGU/BPN-26/2004 dated 19 October 2004 about HGU of PT Telaga Hikmah for area covers 126.00 ha. From this decree, issued HGU Certificate No. 12 dated 24 November 2004 for area covers **126.00 ha** that valid for 35 years, or up to 23 November 2039.

Associate Smallholders

In ASA 1.1, there are 5.245 smallholder has land rights in form of SHM total **11,138.88 Ha**. Land rights is in form of SHM, so status of the land belongs to farmer himself.

Environment Aspect

The company shows that the permits related to the environment it owns include:

- EIA and RKL/RPL (Environmental Management/Monitoring Plan) compliance with regulation of Minister of Environment Regulation No. 5 of 2012 and Minister of Environment Regulation No. P.24 of 2018.
- Permit of POME Disposal of PT Sampoerna Agro based on the head of the Environment service of Ogan Komering Ilir number: 660/KEP/SKET/DLH-PPKL/2022 dated June 20, 2022 which is valid if not change operation. Wastewater is discharged into the Dabok Hitam river, with the highest discharge of 2.5 m3 per ton of CPO Palm Oil Product.
- The surface water extraction permit issued by Sumatera Selatan Province from One Stop Investment and Services Office No. PB-UMKU:912030973055500080001 dated 27 September 2022 valid if not change operation.
- Technical approval regarding PT Sampoerna Agro Tbk (Selapan Jaya POM) hazardous waste management number 660/730/KEP.PSLB3/DLH/2021 dated 17 December 2021 is valid as long as there is no change in operational activities.
- Permit of Hazardous Storage based on Decree of Regent of Ogan Komering Ilir No. 382/KEP/D.LH/2017 dated 19 June 2017 which is valid for 5 years, for 17 hazardous storage buildings that are included in the scope of certification. On the ASA 1.1 audit was underway, the hazardous storage permit was still in the stage of being extended, the CH showed documents on the minutes of a site visit by the Ogan Komering Ilir Environmental Office regarding the recommendation for the issuance of a technical approval.
- Permit of domestic liquid waste disposal PT SA based on Decree of Head of One-Stop Investment and Integrated Service Office Ogan Komering Ilir District No. 11/KEP/DPMPSTSP/IPAL.D/X/2018 dated 5 October 2018 which is valid for 5 years.

BMP Aspect

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

Compliance with Worker Welfare Regulations:

The determination of wages at Unit certification is based on the minimum wage in Sumatera Selatan Province based on the Decree of the Governor of Sumatera Selatan No. 746/KPTS/Disnakertrans/2021 on November 18, 2021. The Minimum Wage for Sumatera Selatan Province District in 2022 is Rp. 3,144,446. Related to this, the company has Memo No. 003/RHP/I/2022 dated January 19, 2022, regarding wage determination in 2022 amounting to Rp 3,144,446.

2.1.2

Procedure of laws and/or regulations pursuant is presented in procedure No. P-SAG-HO-SUS-06 dated 01 September 2017, which mentioned that monitoring of pursuant, as well as update on law register is annually conducted by Sustainability Officer. As for the third parties or contractors, the monitoring has conducted quarterly through direct monitoring and questionnaire.

Update on list of laws and/or regulations for unit of certification period 2021 is presented in document Memorandum No. 079/SUS/V/2021 dated 1 September 2021, signed by Compliance Assistant and System & Certification Manager, summarized as follows:

- Occupational safety and health (OSH) aspect consist of 92 regulations.
- Environment management aspect consist of 95 regulations.
- Plantation aspect (included forestry and legal aspect) consist of 46 regulations.
- Other aspect consists of 36 regulations.

The list above mentioned that there were three regulation that not applicable or changed with new regulations and 10 new regulations issued in 2020 until 2021 were added on the list, for example PP No. 35 in 2021 about contract worker (PKWT), outsource, time of work and break time and work termination; Permentan No. 18 in 2021 about facility of community plantation, etc.

Law registers and pursuant monitoring for associate smallholder cooperative (KUD) has shown in document of "*Evaluasi Pemenuhan UU & Peraturan Syarat Lainnya*" that signed by Compliance Assistant, Head of KUD, Smallholder manager

and System and Certification Manager of Sampoerna Agro. Regulation pursuance monitoring has covers OSH, environment, plantation and other aspect. Sighted regulation monitoring on sampled cooperative, as follows:

- KUD Marga Mulya dated 1 September 2021.
- KUD Bina Tani Mulya dated 1 September 2021.
- KUD Sedia Mukti dated 1 September 2021.
- KUD Bina Sejahtera dated 1 September 2021.

Law Register for Contractors and Suppliers

For third parties' regulation pursuance monitoring, unit of certification has evaluation form of third party which signed by Mill or Estate and contractor representatives. The evaluation form consist of third-party performance monitoring towards environment requirements (zero burning, waste management, etc.); safety requirements (PPE, medical checkup, preventive on emergency situation); human rights requirements (working hours, overtime, leave, anti-force labor, minimum age, non-discriminative, save environment); work performance; and manpower aspect (minimum wage, life and/or health insurance/BPJS).

2.1.3

Company has the mechanism to maintain the operational boundary written in work instruction (WI) No. WI-SAG-KBN-PML-0206 dated 02 March 2015 and work instruction No. WI-PLASMA-PP-CA&L-0201 dated 01 December 2018 the procedure explain that monitoring and maintenance of boundary poles conducted once a year. In order to implement the management of operational boundaries, the company also shows records of monitoring and management of HGU boundary markers and its condition. Based on field observation to HGU stakes and land demarcation No. 77 (block 31 A), No. 71 (block 32 B), and No. 72 (block 32 B) in Hikmah Dua Estate, it is known that HGU boundaries are maintained and clearly visible and no indications of cases of boundary violations or excess planting. Also based on field visit to KUD Sedia Mukti, Bina Tani Mulya, Marga Mulya, and Bina Sejahtera, it is known that the boundaries between member are clearly visible.

Based on the results of consultations with representatives of the people of Embacang Permai, Maribaya, and Pulau Geronggang Village Village, information was obtained that there were no indications of cases of boundary violations or excess planting.

Status: Comply

2.2

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

2.2.1; 2.2.2; and 2.2.3

The company has a list of contractors included in the stakeholder register that including contractor to transport hazardous waste, FFB transporter and etc. The list of stakeholders informs the name of the agency, contact name, address, and contact number. The company has shown examples of agreement with third parties that have contained clauses regarding legal compliance obligations, such as:

- Agreement Letter No. 25/KOP.MM/DS.TM/VI/2021 dated 3 June 2021 for the transportation of FFB between KUD Marga Mulya and contractor.
- Agreement Letter No. 05/SPK/KUD-BTM/VII/2022 dated 1 July 2022 for the transportation of FFB between KUD Bina Tani Mulya and contractor.
- Addendum to Work Agreement Letter No. 0043/TH-HD/SPK-LKL/I/2022 dated 1 July 2022 for the transportation of FFB between the contractor (Koperasi Mandiri) and PT Telaga Hikmah

The agreement has explained several regulatory compliances, for example:

- Must comply with laws and regulations.
- Obligation to provide personal protective equipment and wear it when working in the field.
- It is prohibited to employ children under 18 years of age.
- Do not employ forced workers or employ people who are the result of human trafficking.

The company also shows evaluations of contractors, for example the FFB transporter contractor Mandiri Cooperative and CV Agri Karya Nusantara (EFB transporter) on November 1, 2022. The results of the evaluation show that the parameters

of compliance with employment, implementation of OHS and others have had good results.

The company has shown a list of contractor workers along with compliance with related regulations. For example, contractor Duta Marga Lestarindo with a total of 10 workers working at Sampoerna Agro and evidence of BPJS payment for September 2022 has been shown, which was paid on September 28, 2022.

Based on interview with FFB supplier (Bintang Sarana) and contractor (Mandiri Cooperative), known that unit certification has socialized about obligation to comply with regulation. In addition, based on interview also known that contractor has paid wages based on minimum wage regulation and has involved employees in BPJS program.

Status: Comply

2.3

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

2.3.1

Selapan Jaya POM receives FFB directly from Associate Smallholders under PT Sampoerna Agro, the collection centres or agents. The company has had document of identification cover the information of the name of suppliers, address, geo coordinate, land title status, plantation permit, certification status, and management representative and contact number. For example, FFB supplied by Sedia Mukti smallholder is located on Latitude -3.695302" and Longitude 105.055611", has deed of incorporation, and land rights.

2.3.2

Based on the FFB supplier list document, Selapan Jaya POM also receives FFB from indirect sources, for example from CV Bermuda Agro Mandiri, CV Bintang Sarana Abadi, and Berkas Sentosa Abadi. The document also provides information about the coordinates of the collector's estate and the types of land rights from the estate. However, the company has not been able to show the coordinates of each farmer who supplies their FFB to collectors and proof of land ownership. This has been a non-conformity in the previous assessment and not closed yet during this assessment and remains a non-conformity in ASA 1.1. **Minor Raised to Major.**

2.3.2 Status: Nonconformity No. 2021.01 Minor Raise to Major

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

Selapan Jaya POM has several FFB supply bases including Hikmah Dua Estate, KUD Sedia Mukti, KUD Bina Sejahtera, KUD Marga Mulya, and KUD Bina Tani Mulya. All units have 5 years long term plan, for example KUD Bina Tani Mulya has a management plan in the 2022 – 2026 work plan and budget projection document which was approved by the Head of KUD. The document discusses plantation operational targets, the environment, budget plans and income budget plans for 2021-2025, including KUD Bina Tani Mulya setting a FFB production target for 2021-2022 of 18,443 tons and in 2023-2025 the plants will be replanted using this type of seed Sriwijaya.

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

3.1.2

Selapan Jaya POM has several FFB supply bases including Hikmah Dua Estate, KUD Sedia Mukti, KUD Bina Sejahtera, KUD Marga Mulya, and KUD Bina Tani Mulya. All units have a replanting plan projected for the next 5 years, including Hikmah Dua Estate replanting in 2023–2025, KUD Sedia Mukti replanting in 2021-2023, KUD Bina Tani Mulya replanting in 2023-2024 and KUD Bina Sejahtera has completed replanting in 2021.

The CH has a replanting procedure, namely in SOP No. SA-Plasma-PP-KS-13 which was approved by the Managing Director on April 01st, 2017 that replanting with zero burning is clearing land without burning by cutting down tree stands on old plantation crops and then shredding them into small parts, stockpiling them and adjusting them so that naturally decomposes. The criteria for areas that can be replanted include:

- Plant age > 25 years
- Productivity < 16 tons/ha

- SPH<100 pkk./Ha
- Average plant height of 13 m
- Availability of capital for replanting

In addition, the CH has procedures related to management review in SOP No. P-SAG-HO-SUS-05 was approved by the Chief Executive Officer on September 01st, 2019 which regulates the evaluation of operational activities. The certification unit has conducted management reviews, including a management review conducted by KUD Bina Sejahtera to evaluate operational performance in 2021 in the form of an Annual Member Meeting on 31 December 2021 which was attended by all KUD management, including discussing management accountability reports, supervisory body reports, inspection minutes cash, profit and loss calculation, 2022 work plan and income and expenditure plan.

Based on the description above, it shows that the company has a projected annual replanting program for at least the next five years and is reviewed annually

3.1.3

The CH has Internal Audit SOP No. P-SAG-HO-SUS-03 was ratified by the Chief Executive Officer on August 1st, 2020. In addition, the certification unit has Management Review SOP No. P-SAG-HO-SUS-05 was approved by the Chief Executive Officer on September 1st, 2019. The unit of certification has conducted regular management reviews, including a management review meeting conducted by KUD Bina Tani Mulya to evaluate operational performance in 2021 in the form of the Annual Member Meeting on December 31st, 2021, which was attended by all KUD management, including discussing management accountability reports, supervisory agency reports, minutes of cash inspections, profit and loss calculations, work plans for 2022 and income and expenditure plans.

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

Status: Comply

3.2

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

3.2.1

The CH has a continuous improvement program for the 2022 period, including a program to improve the quality of human resources that has been carried out including training and outreach related to operational activities in the field which aims to enable employees to understand work techniques according to company standards, understand the meaning of OSH, HIRAC or potential hazards and the risks that exist in their work activities, the importance of PPE and OSH. In addition, the certification unit monitors and inspects the use of employee PPE which is carried out randomly once a month as a form of realization to reduce the number of work accidents.

For example, the processing capacity of the factory does not reach the installed capacity. The company evaluates and repairs consistently in filling the lorries according to design, carrying out preventive maintenance according to schedule, and suppressing factory breakdowns.

In addition, in the daily recruitment of workers there is no work agreement, so the company is making improvements that every labor recruitment must be made a work agreement by HRD

Based on the description above, it shows that the company already has evidence of continuous improvement implementation

3.2.2

The company has shown the auditor the RSPO Version 2.1 metric template which has been filled in according to the facts and data in the company's record documents, such as the number of workers, production area to work accident records. Based on document verification, for the RSPO metric template it is known that annual data for a period of 12 months will be used in 2022 for the schedule for reporting annual social and environmental data, including data on water consumption monitoring, HCV management and monitoring.

Based on the description above, it shows that the company has used the RSPO metric template format as part of the continuous monitoring and improvement process.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The CH already has operational procedures including Agronomy Procedure and Palm Oil Mills. Agronomic procedures include land clearing, oil palm seeding, Leguminose cover crops (LCC), oil palm planting, fertilizing, weed control, harvesting, pest control, pesticide handling, maintenance of boundary markers, pesticide management, and application of empty fruit bunch. Whereas at Selapan Jaya Mill there are 24 operational procedures including procedures for recording and weighing FFB, CPO & CPK to measuring product quality, including procedures at loading ramp station No. P-SAG-PPS-02 takes effect on September 1st, 2017 and 180 Work Instructions including WI Sorting FFB No. WI-SAG-PPS-0103 applies Aug 1st, 2020. All units, whether in factories, estate or smallholders, have procedures that cover all aspects, for example:

- Procedure of Traceability and mass balance No. P-SAG-PPS- 14, Revision 1, issued date April 1, 2016.
- Procedure of loading ramp No. P-SAG-PPS-02, Revision 1, issued date September 1, 2009.
- Procedure of clarification No. P-SAG-PPS-62, Revision 1, issued date September 1, 2009

Smallholders have their own procedures, for example, KUD Bina Sejahtera (cooperative) has a Standard Operating Procedure (SOP) covering all aspects of oil palm management issued April 1, 2016.

In addition, the certification unit already has a mechanism for examining the implementation of procedures contained in the Internal Audit SOP No. P-SAG-HO-SUS-03 was ratified by the Chief Executive Officer on August 01st, 2020 and Management Review SOP No. P-SAG-HO-SUS-05 which was approved by the Chief Executive Officer on September 1 2019. This procedure includes audit planning, implementation, reporting, documentation of Internal Audit results, and evaluation of Auditors. Regarding the implementation of this procedure, the company shows the results of the management review meeting which was held on December 31st, 2021.

Based on the description above, it shows that the company already has Standard Operating Procedures

3.3.2

The CH has an inspection mechanism for the implementation of the procedures contained in the Internal Audit SOP No. P-SAG-HO-SUS-03 was ratified by the Chief Executive Officer on August 1st, 2020 and Management Review SOP No. P-SAG-HO-SUS-05 which was approved by the Chief Executive Officer on September 1st, 2019. This procedure includes audit planning, implementation, reporting, documentation of Internal Audit results, evaluation of Auditors, effectiveness of procedures/Work Instructions and changes to changes affecting the management system, results of internal audits, results of external audits, achievements of each department/plantation/mill, Improvements that can be made, corrective and preventive actions and follow-up on the results of the previous meeting

Based on the description above, it shows that the company already has a system to monitor compliance and the implementation of ethical business policies and practices as a whole

3.3.3

The certification unit has conducted regular management reviews, including a management review meeting held by KUD Bina Tani Mulya to evaluate operational performance in 2021 in the form of an Annual Members Meeting on 31 December 2021 which was attended by all KUD management, including discussing management accountability reports, supervisory body reports, minutes of cash checks, profit and loss calculations, work plans for 2022 and income and expenditure plans. In addition, there was a management review carried out by the management of the Marga Mulya cooperative on May 10th, 2022 which was attended by the cooperative management, supervisory and administrators who agreed that based on the proposals from each group at the members' meeting it was agreed that the salary of group administrators was 3% of the total income of each group.

The company also conducted a management review at the Selapan Jaya Mill on July 7th, 2022 which was attended by all

staff and clerks of the factory who discussed the yield not reaching the company's target, so the sorting officers were advised to continue to tighten the quality of FFB suitable for processing at the factory.

On August 15th, 2022, the Telaga Hikmah II Estate Estate Manager coordinated and evaluated the consistency of using PPE and the presence of harvesters. All field supervisors to take strict action against employees who do not comply with company regulations.

In addition, there was a management review at the Bina Sejahtera Cooperative on September 6th, 2022 which was attended by 23 farmers and cooperative management, that all cooperative managers and farmers should pay attention to managing pesticide packaging and fertilizer sacks so that they are recorded and stored in the Cooperative Warehouse

Based on the description above, it shows that the company has a record of monitoring and follow-up.

Status: Comply

3.4

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

3.4.1

Environmental document.

PT Telaga Hikmah (Hikmah Dua Estate)

The company (Hikmah Dua Estate) has EIA document (ANDAL) year 1996. The EIA document has approved by Department of Agriculture No. 142/BA.5/IV/1996 dated 18 June 1996. The EIA document covering activity such as pra construction (legal land), construction including estate activity (land clearing, road building, land cover crop, drainage, nursery, planting) and infrastructure (emplacement, office building, mill, general facility), operational activity (labor recruitment, fertilizing, circle weeding, harvesting, pest and disease, pruning) and pasca construction (harvesting, FFB transportation, mill processing). Then in 2004, estate revised their EIA document, approved by Environmental Official Government of Ogan Komering Ilir. This revised because Land application program plan was changed from Hikmah Dua estate to Hikmah Satu estate.

PT Sampoerna Agro (Selapan Jaya Mill dan 11 KUD)

Company has shown environmental documents in form of AMDAL in 1997 consisting of ANDAL and RKL-RPL documents which has been approved by the Ministry of Agriculture on April 24, 1996 No. 139/BA.5/IV/1996 with total area of 22,099.47 ha consisting of main plantation and plasma plantation. The area for main plantation is 2,932 ha and plasma plantation is 19,167.47 ha. In addition, there is a palm oil mill with capacity of 60 Ton FFB/hour.

Company already has AMDAL Addendum document consisting of an ANDAL and RKL-RPL documents in 2017 named Palm Oil Plantation and Palm Oil Processing Factory for Change of Company Ownership, Addition of Palm Oil Mill Capacity to 120-ton FFB/Hour, Operation of Biogas Power Plant and Replanting with an area of 24,198.16 ha consisting of main and plasma plantations in Mesuji Raya District and Pedamaran Timur District, Ogan Komering Ilir District, North Sumatra Province. The area for main plantation is 3,077.88 ha and plasma plantation are 21,120.28 ha (already planted since 1991). There is a Decree of Regent of Ogan Komering Ilir No. 628/Kep/DLH/2017 about Environmental Feasibility of Oil Palm Plantation Activities and Palm Oil Processing Mills and Supporting Facilities, Changes in Company Ownership, Increased Factory Capacity to 120-ton FFB/hour, Operation of Biogas Power Plant and Replanting in Mesuji Raya District and Pedamaran Timur District, Ogan Komering Ilir District, Sumatera Selatan Province on 27 December 2017. There is also environmental permit based on Decree of Head of Office of Investment and One Stop Service of Ogan Komering Ilir District No. 08/Kep/I.LK/DPMPTSP/2018 about Environmental Permits for Oil Palm Plantation Activities and Palm Oil Processing Mills and Their Supporting Facilities, Changes in Company Ownership, Increased Factory Capacity to 120 ton FFB/hour, Operation of a Biogas Power Plant and Replanting in Mesuji Raya District and Pedamaran Timur District, Ogan Komering Ilir District, Sumatera Selatan Province on April 6, 2018.

PT Aek Tarum (KUD Jadi Mandiri)

The company has environmental document of Environmental Impact Analysis Document (KA-ANDAL) of plantation and Palm Oil Mill with PIR-TRANS scheme PT Aek Tarum in Ogan Komering Ilir District, Sumatera Selatan Province with study area of 15,000 ha and mill capacity of 60 tons FFB/hour. The document has been approved based on document No.

66/KPTS/BAPEDALDA/2008 dated 11 August 2008. Company also already has an Environmental Impact Analysis Document (ANDAL) for PT Aek Tarum PIR-TRANS oil palm plantation and mill in Mesuji District, Ogan Komering Ilir District, Sumatera Selatan Province based on a 15,000 Ha location permit that has been approved by the Regional Environmental Impact Management Agency with document No. 594/KPTS/BAPEDALDA/2005 dated October 28, 2005.

SIA**PT SA (Selapan Jaya Mill)**

Company has conducted SIA in 2014 conducted by Social Investment Indonesia. SIA process has involved relevant stakeholders such as community representatives and head of Sumber Hidup Village, Pulau Gronggang Village, Maribaya Village, Balian Village, Sedyomulyo Village, Pagar Dewa Village, Gedung Rejo Village, Sumber Hidup Village, Kayu Labu Village, Kerta Mukti Village, etc. which was conducted on December 17, 2014.

PT TH (Hikmah Dua Estate)

Company has conducted SIA in 2014 conducted by Social Investment Indonesia. SIA process has involved relevant stakeholders such as community representatives and the head of Sumber Hidup Village, Pulau Gronggang Village, Maribaya Village, Balian Village, Sedyomulyo Village, Pagar Dewa Village, Gedung Rejo Village, Sumber Hidup Village, Kayu Labu Village, Kerta Mukti Village, etc. which was conducted on December 17, 2014 (42 participants).

PT Aek Tarum (Koperasi Jadi Mandiri)

Company has conducted SIA conducted in 2012 in collaboration with Faculty of Forestry, Bogor Agricultural University. The assessment was carried out by consulting with stakeholders, indicated by attendance lists and photos of FGD activities such as with Tegal Sari Village, Sumber Deras Village, Surya Adi Village, Kali Village Deras, Pematang Panggang Village, Balian Makmur Village, Mulya Jaya Village, Kembang Indah Village, Sumber Baru Village which was conducted from 12-15 September 2012.

Plasma PT SA (10 KUD)

Plasma of PT Sampoerna Agro has conducted SIA by Consultant named PT Sonokeling Akreditasi Nusantara. SIA was carried out for 17 KUDs under patronage of PT Sampoerna Agro. The SIA was carried out on 13-19 February 2019. During SIA process, consultations and gathering information from relevant stakeholders such as Sumber Baru Village, Panca Warna Village, Tanjung Makmur Village, Sumbu Sari Village, Mataran Jaya Village, Maribaya Village, Kerta Mukti Village, Bumi Makmur Village, Karya Mukti Village, Mekar Wangi Village, Sedyo Mulyo Village, Gedung Rejo Village, and plasma employees. There were 2 assessors sent to assess the impacts of All PT SA 17 schemes smallholder and KUD (Cooperative) Bina Sejahtera, KUD Sedia Mukti, KUD Sumber Sentosa, KUD Subur Makmur and KUD Bina Tani Mulia have included in the scope. There are list of attendance of SIA process such as FGD, HCVA, SIA and CSA stakeholder consultation at Kerta Mukti Villages, conducted on February 16th 2017 attended by 11 local community leaders (cooperative, traditional and local leader).

3.4.2**Environmental document**

The Implementation of environmental monitoring and management plan are documented on periodical report of environmental monitoring and management implementation report (RKL-RPL) for Selapan Jaya POM and environmental monitoring and management plan (RKL-RPL) report for PT SA. The company is consistently done the environmental management and monitoring as outlined in the Report of the Environmental Management and Monitoring per semester regularly.

The company are consistently done the environmental management and monitoring as outlined in the Report of the Environmental Management and Monitoring per sixth month regularly. This report described realization of monitoring and management of the environment in accordance with environmental parameters in the RKL/RPL. The environmental management reports are carried out every 6 months and submitted to the relevant agencies, namely the Environmental Service of Ogan Komering Ilir Regency, the last report was carried out on October 07, 2022 for the RKL-RPL Report for Semester 1 of 2022, electronic receipt number 1652410763-4021.

Based on the results of the verification report on the implementation of the RKL-RPL in semester 1 of 2022, not all significant impacts have been managed and monitored, which are described in the report, as required in the AMDAL

Addendum year 2017 document, for scope PT Sampoerna Agro (Selapan Jaya Mill dan 11 KUD, namely for significant impacts:

- Erosion rate
- Water quality
- Air quality and noise
- Diversity of aquatic biota
- Socio-economic and cultural impacts
- Prevention of forest and land fires

Meanwhile, for the implementation of the RKL-RPL in semester 1 of 2022 for the scope of Hikmah Dua estate, significant impacts consist of:

- Land quality and drainage
- Soil quality
- Water quality
- Air quality and noise
- Aquatic biota
- Vegetation and wildlife
- Socio-economic culture and public health
- Prevention of forest and land fires.

For the scope of the Jadi Mandiri Smallholder Scheme of the RKL-RPL in semester 1 of 2022 environmental significant impacts consist of:

- Erosion rate
- Water quality
- Air quality and noise
- Vegetation and wildlife
- Diversity of aquatic biota
- Community perception
- Prevention of forest and land fires.

Social aspect

As a form of social management, the company has developed/compiled by involving independent parties in conducting social impact assessments related to the company's operational activities. In the social study, the affected villages were 17 villages for each smallholder, for example Suka Sari village, Kerta Mukti village, Gedong Rejo village, Sedyo Mulyo village, Bumi Makmur village etc. The social impact assessment has covered all operation area i.e POM, Hikmah Dua estate and all smallholder. The social impact assessment was first carried out in January 2017 by Sonokeling as a follow-up to the results of the assessment, there are several recommendations / matrices for social impact management and monitoring plans, including:

Internal Impact

- Natural resources
- Human Resources
- Economic resources
- Socio-cultural
- Infrastructure

External impact

- Implementation of OHS
- PPE
- Worker representatives
- Competency Development
- Wages
- Employee Welfare Benefits
- Patterns of communication

As one of the improvement efforts and taking into account the latest situation from 2017, the company carried out

Stakeholder Consultation for the PT SA social impact report which was carried out in 2020. The results of the SIA review include:

- Economic aspects, welfare, employment and increasing income.
- Social, cultural and security aspects
- The educational aspect

The SIA review was carried out by involving the local community, in a discussion group forum activity for the district level conducted on April 7 2021, 8 local villages in 3 Districts (Mesuji Raya, Pedamaran and Pedamaran timur) conducted from March to October 2021.

The company also shows the planning and monitoring matrix and the implementation of the 2021 SIA, namely:

External

- Natural resources
- Human Resources
- Economic resources
- Socio-cultural
- Infrastructure

Internals

- Implementation of OHS
- PPE
- Worker representatives
- Competency Development
- Wages
- Employee Welfare Benefits
- Patterns of communication

Based on the results of a document review and field visit, information was obtained that KUD Bina Sejahtera, KUD Sedia Mukti, Jadi Mandiri and KUD Maju Lancar have carried out replanting activities between 2020 and 2021.

The unit of certification shows the report document on the implementation of the 2021 Social Impact Planning and Monitoring and the report on the implementation of the Environmental Planning and Monitoring (RKL-RPL semester 1 of 2022), but there are still significant impacts that have not been covered in the implementation of the Social and environmental Impact Planning and Monitoring, namely for impacts important for replanting activities.

The company has not been able to provide sufficient evidence that the plan and implementation of the management and monitoring of social and environmental impacts have covered all the significant impacts arising from operational activities, namely for replanting activities. **This indicator become Non-Conformity number 2022.01 with minor category.**

3.4.3

The company has documents, the implementation of the results of the environmental permit including reports to agencies in the form of RKL-RPL documents which are conducted every semester. The company can show proof of reporting in the form of a document affixed with a stamp, the name and signature of the recipient which is sent to relevant agencies such as the Environmental Service of Ogan Komering Ilir Regency, the last report was carried out on October 07, 2022 for RKL-RPL Report for Semester 1 of 2022, electronic receipt number 1652410763-4021.

Evaluation for environmental monitoring / management plans have been developed on January 2022 and as the feedback of review, company has included CSR implementation, land fires monitoring, land applications, and toxic/hazardous waste monitoring parameters since 2nd semester 2021 monitoring report.

The implementation of environmental management and monitoring is carried out in accordance with the direction of the RKL-RPL as described in indicator 3.4.1. The effectiveness of environmental management and monitoring can be seen from the results of environmental management and monitoring analysis, which can also be seen from the suitability between the management and monitoring plans and their implementation in the field.

The RKL-RPL document also shows that the company has managed all the impacts recommended in the RKL-RPL Documents. In general, the forms of evaluation carried out by the company include Trend Evaluation, Critical Level Evaluation and Compliance Evaluation. Several things can be concluded from the RKL-RPL document, among others:

- PT. SA has carried out environmental management by implementing it in plantations and palm oil processing factories (POM) and IPM (Integrated Pest Management) principles.
- Environmental management is carried out by utilizing palm oil mill solid waste. Shells are used as boiler fuel, fibers are used as boiler fuel, EFB are used as compost and organic fertilizer in Estate.
- Palm Oil Mill Effluent (POME) disposal to surface water, previously processed in the WWTP pool, POME that is disposed of must meet the threshold appointed by government.
- The measured emission quality of the boiler chimneys is below the required quality standards.
- Ambient air quality and noise are still below the quality standard for employee residential areas and for locations around POM.
- The quality and quantity of groundwater taken from monitoring wells still meet quality standards. The quality standard used is Permenkes 32/2017.
- The quality of biota in the waters of PT SA is moderate and stable.

The company also shows the implementation of the monitoring and the implementation of the 2021 SIA, for all scope namely:

External

- Natural resource
- Human Resources
- Economic resources
- Socio-cultural
- Infrastructure

Internals

- Implementation of OHS
- PPE
- Worker representatives
- Competency Development
- Wages
- Employee Welfare Benefits
- Patterns of communication

No negative issues raised during interviews with communities surround the plantation such as interviews with community leaders, women's communities, local contractors, and Village Official of Maribaya Village.

The SIA review was carried out by involving the local community, in a discussion group forum activity for the district level conducted on April 7 2021, 8 local villages in 3 Districts (Mesuji Raya, Pedamaran and Pedamaran timur) conducted from March to October 2021.

	Status: Non-Conformity	
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3.5

A system for managing human resources is in place.

3.5.1

The company shows documents governing the human resource management system, including:

- Recruitment procedure No. P-SAG-HO-HR-01 dated August 1, 2019
- Procedures for assigning tasks, authority and performance appraisal No. P-SAG-HO-HR-03 dated 1 June 2020

In addition, the Collective Labor Agreement also explains the human resource management system, including:

- Article 8 → Planning and Recruitment of Workers
- Article 9 → Requirements for Hiring Workers
- Article 10 → Probation Period

- Article 11 → Status and Promotion of Worker's Class/Position
- Article 12 → Movement of Workers
- Article 31 → Skills Improvement
- Article 47 → Termination of Employment Procedure
- Article 48 → Employee Resigns
- Article 49 → Termination due to old age
- Article 51 → Prohibition of Termination of Employment

KUD has also shown the mechanism that regulates the human resource management system, such as:

The mechanism for accepting workers for KUD BTM is regulated in the Management Decree No. 05/KUD-BTM/XI/2021 dated 1 November 2021 and for KUD Bina Sejahtera it is contained in the New Employee Acceptance Mechanism document dated 20 May 2020. In this recruitment mechanism/procedure, for example for KUD Bina Sejahtera are explained, including:

- The management conveys the need for manpower according to the needs
- The group conveys information to the community
- New workers are required to attach the results of their health tests and other requirements submitted by KUD
- Recruitment of new employees is carried out without any charge.
- etc.

3.5.2

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

Unit Certification has shown a record of the implementation of employment procedures, for example:

Promotion

- Decree Letter No. 023/HRS/SK/Pr/II/2022 dated 11 February 2022 who was promoted to monthly employee.

Appointment of employees

- Memorandum No. 0008/HD/VI/2022 dated 3 June 2022 regarding the appointment of an employee with the initials IM
- Memorandum No. 0006/HD/VI/2022 dated 3 June 2022 regarding the appointment of employees with the initials PY
- Memorandum No. 0006/HD/VI/2022 dated 3 June 2022 regarding the appointment of an employee with the initials YT

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

Status: Comply

3.6

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

3.6.1

The CH has procedures for identification, assessment, control of risks and HSE impact aspects in document No. SOP No. SOP-AGR-078-R00 entitled Identification, Assessment, Hazard-Risk Control and HSE Impact Aspects. The document is a procedure for identifying all potential hazards from the company's operational activities, a procedure for assessing the level of risk from the identification of sources of danger from the company's operational activities, determining risk assessment actions based on an assessment of the level of risk and making a work plan to carry out risk assessment actions and carry out evaluation of hazard source identification, risk assessment and risk assessment that has been carried out.

The CH has carried out hazard identification, assessment and risk control of environmental OSH impacts, including for

Selapan Jaya POM in record No. FM-SAG-HO-SUS-070006. Hazard identification and risk control at the factory include Loading Ramp, Sterilizer, Tippler, Screw Press, Clarification, Kernel Plan, Boiler, Engine Room, Maintenance Department, Laboratory Department, Compound Department, Grading Department, Warehouse Department, Hazardous Waste Temporary Storage, Dispatch, Office and Operations of Weight Bridge. Hazard identification and risk control in plantations includes harvesting and transportation, chemistry, fertilization, manual maintenance, land application and EFB applications, emplacements, engineering departments, warehouses, offices, transportation and road infrastructure, replanting and at the clinic. Identification, Assessment, Risk Hazard Control and Impact Aspects are updated according to the existing condition of the work.

The CH has maintained the health status of its employees, including through periodic and special MCU which will be implemented in 2022, for example there is a periodic health check for cholinesterase and spirometry at KUD Bina Sejahtera on May 21st, 2022 as many as 25 employees sprayed with normal results.

Based on the description above, it shows that the company has identified the risk of OSH problems and applied them in the field

3.6.2

Based on the OSH license monitoring document for workers at Selapan Jaya POM in 2022, there are licenses that have expired, and some are in the process of being renewed, as follows:

NO	DOCUMENT	DEPARTMENT	DATE OF ISSUE	VALIDITY PERIOD
1	Lift Aircraft	Wheel Loader Operators	06-Oct-17	06-Oct-22
2	Steam Boiler	Power House Operators	18-Apr-16	18-Apr-21
3	Steam Boiler	Boiler Operators	22-Sep-17	22-Sep-22
4	Steam Boiler	Boiler Operators	22-Sep-17	22-Sep-22
5	Steam Boiler	Boiler Operators	22-Sep-17	22-Sep-22
6	Lift Aircraft	Excavator Operators	06-Oct-17	06-Oct-22
7	Lift Aircraft	Hoisting Crane Shift 1 Operators	06-Oct-17	06-Oct-22
8	Lift Aircraft	Hoisting Crane Shift 2 Operators	06-Oct-17	06-Oct-22
9	Steam Boiler	Sterilizer Line 1 Shift 1 Operators	18-Apr-16	18-Apr-21
10	Lift Aircraft	Wheel Loader Operators	15-Mar-16	15-Mar-21
11	General OSH Expert SJ POM	General OSH Expert	15-Aug-18	15-Aug-21
12	Steam Boiler	Sterilizer Line 1 Shift 2 Operators	18-Apr-16	18-Apr-21
13	Class D fire safety specialist	Engine Room Operators	24-Oct-18	24-Oct-21
14	Class D fire safety specialist	Sortation Operators	24-Oct-18	24-Oct-21
15	Class D fire safety specialist	Warehouse Staff	24-Oct-18	24-Oct-21
16	Class D fire safety specialist	General Foreman	24-Oct-18	24-Oct-21
17	Class D fire safety specialist	Sample Boy	24-Oct-18	24-Oct-21
18	Class D fire safety specialist	Wheel Loader Operators	24-Oct-18	24-Oct-21
19	Class D fire safety specialist	Boiler Operators	24-Oct-18	24-Oct-21
20	Class D fire safety specialist	WTP Operators	24-Oct-18	24-Oct-21
21	Class D fire safety specialist	Biogas Administrator	24-Oct-18	24-Oct-21
22	Class D fire safety specialist	Officer Staff	24-Oct-18	24-Oct-21
23	Class D fire safety specialist	WTP Operators	24-Oct-18	24-Oct-21
24	Class D fire safety specialist	Team Leader	24-Oct-18	24-Oct-21
25	Class D fire safety specialist	General OSH Expert	24-Oct-18	24-Oct-21
26	Class D fire safety specialist	Boiler Operators	24-Oct-18	24-Oct-21
27	General OSH Expert Hikmah Dua Estate	General OSH Expert	-	-

Based on interviews with 2 Sterilizer Operators, 1 Boiler Operator and 1 Machine Room Operator stated that they had attended OSH operator training but had never held an operator card. After reviewing the documents, it was discovered that the Boiler Operator license with the initial IWM expired on September 22nd, 2022, and the sterilizer operator with the initial RH was not included as an operator who had attended OSH steam aircraft operator training. Likewise with the sterilizer operator with the initial R, the license expires on April 18, 2021. As for the Power House operator with the initial M, the validity period for the OSH license for power and production aircraft operators is until March 27th, 2023. In addition, there are 9 OSH Lift and Transport licenses that have expired at Hikmah Dua Estate and the company has not been able to show the progress of their renewal.

The CH shows the progress of renewing the SJ POM OSH license, namely:

- On August 13th, 2021 the Mill Manager sent an email to the Head of HR Operation regarding the extension of operational license and General OSH expert (there were 8 people: 2 OSH Lift and Transport Aircraft, 4 Steam Aircraft Operators, 1 OSH Electrical Technician, 1 General OSH expert)
- November 17th, 2022 KTU Factory submitted an application for extension of OSH expert Fire, v Electricity, and operator license for Power and Production Aircraft, Electricians, Welders, Steam Aircraft Operators and Lift and Transport Aircraft.
- November 18th, 2022 HRGA followed up with information, as follows:
 - Regarding the application for fire safety expert certification, namely Pontas Masioloan Silalaen, a OSH Service Company has been sought but is constrained by quotas (1 class minimum of 10 people) & can be entered in class D first because they cannot go straight to class A (OSH fire expert). We will notify you if the class from OSH Service Company can be done.
 - Regarding General License Operator OSH Expert, OSH Steam Operator, OSH Lift Aircraft and OSH Electricity as many as 6 people, the extension has been carried out through the South Sumatra Provincial Manpower and Transmigration which is still being processed at the Jakarta Ministry of Manpower. If it hasn't been completed yet, we will look for OSH Service Company parties who can carry out the extension in question (part of it has been running) and Rey Haster has been refreshed Back on October 19th -21st 2022
 - For laboratory analyst operator shift 1 a.n Andik Wijayanto, we have tried but no OSH Service Company has been able to do it
 - Wheel Loader operator a.n Asmar Harahap is being processed with OSH Service Company
- On November 22nd, 2022 the SJ POM Manager made a memo to the Regional Head HR Services regarding the names of those who would take part in the OSH training, namely 1 OSH power and production aircraft, 1 OSH Electrician, 1 Electrical Technician, 3 Welders, 6 Steam Aircraft Operators and 1 Storage Tank Operator.

The company has not been able to show sufficient evidence that the OSH plans to manage OSH risks in people have been monitored effectively. **NCR-2022.02**

3.6.2	Status: Nonconformity No. 2022.02 with Major category
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3.7

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

3.7.1

The company showed the Training Program for each unit in 2022 that cover all aspects of the P&C RSPO. Based on interview with management, known that the training also covers parties who need training such as staff, workers, smallholder and contractors. As for sustainability and HR department are responsible for the development of the training program scheduling and implementation of training. The training program document informs type of training, plan / timetable and attendance. The 2022 training programs such as:

Mill and Estate training programs in 2022, such as:

- SCCS training
- Training on handling and controlling hazardous waste
- Pest and disease control training
- Training on waste control and management
- Lift and transport aircraft operator certification training
- Training of OHS experts of fire
- And others.

KUD training programs, for example KUD Marga Mulya:

- OHS training
- Training on fire emergency response
- Training on the implementation of SOP/BMP procedures
- Training related to the use of pesticides

3.7.2.

The unit certification already has training records, such as:

- Training Report on standard and quality activities for harvesting, spraying, fertilizing and pest/disease control to KUD Bina Sejahtera employees on March 23, 2022
- Training Report on socialization activities/training on spraying, fertilizing and pest/disease control for KUD Bina Sejahtera employees on September 12, 2022
- Training Report on KUD Bina Sejahtera's emergency response training activities on March 12, 2022.
- Training Report on standard activities for harvesting, spraying, fertilizing and controlling pests and diseases to KUD Bina Tani Mulya employees on March 14, 2022
- Training Report on standard activities for harvesting, spraying, fertilizing and controlling pests and diseases to KUD Sedia Mukti employees on March 9, 2022
- etc

The results of interviews with representatives of labor union and workers such as warehouse officer, harvesters, spraying workers, grading officer, boiler officer stated that the company had provided training or socialization regarding work procedures for each worker in Bahasa and understood by the workers. As for the training program which involve contractors such as SOP socialization and training related to OHS. From the results of interviews with workers and contractors, known that workers and contractors can explain the training that has been obtained such as work procedures and OHS implementation.

3.7.3

The company showed the RSPO SCCS training documentation to those in charge of the RSPO supply chain which was conducted on 24 October 2021. The training was attended by 17 participants.

Based on interviews with weighbridge operators, it is known that workers can explain supply chain implementation, such as certified and non-certified FFB sources, data input, and others.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1, 3.8.2

Based on review of basic info, list of FFB supplier, and interview with Security Officers and Weighbridge Operator, it is known that Selapan Jaya Mill received FFB from certified and uncertified source. Thus, it could be concluded that the mill has only claim its RSPO certified products (CPO and PK) from processing of the RSPO certified FFB as Mass Balance (MB).

3.8.3

Below is last year projected certified volume that submit in palm trace, actual production of certified volume during licensed period and also projection certified volume for next 12 months. The projection certified volume is estimated based on last year production and it will be reported to palm trace.

Product	Last Year Projected Certified Volume (Ton)	Actual production from Nov 2021 until Oct 2022 (Ton)	Projection certified volume (Ton) (12 months)
FFB	200,000	181,103.17	155,000
CPO	43,000	35,535.53	32,600
PK	10,300	9,806.96	8,500

3.8.4

Unit management shows the registration and reporting requirements for the supply chain including:

Member Name	Selapan Jaya Mill of PT Sampoerna Agro, Tbk.
Member ID	RSPO_PO1000005580
RSPO Membership Number	1-0031007-000-00 (PT Sampoerna Agro, Tbk.)
License ID	CB115668 (issued on 12 March 2021)

3.8.5

Procedure of RSPO supply chain mechanism is presented in document No. P-SAG-PKS-PRS-14 (Rev. 03) dated 07 July 2020, as revision to procedure dated 27 July 2019. The procedure has covered all elements of the supply chain model requirements, records and reports of compliance with supply chain requirements including training records. Subject of change included adoption of RSPO SCCS standard 2020, ISCC remove stock, identification of sustainable and non-sustainable product through weighbridge system namely Microsoft Dynamics GP and certification coordinator that responsible for monitoring of CSPO and CSPK sales, geolocation data, shipping procedure, etc. Based on interview with PIC of supply chain and weighbridge operator, they already understand their own responsibility and the implementation of supply chain according to the procedure.

3.8.6

Procedure of annual internal audit is presented in document No. P-SAG-HO-SUS-03 dated 01 November 2019 about integrated management system procedure audit internal, which mentioned that the audit shall be conducted annually by System and Certification Manager for all management scheme such as ISO 9001, RSPO, RSPO-SCCS, ISPO and ISCC, that the result is presented in document Form No. FM-SAG-HO-SUS-030001. Any non-conformity notes should be closed within 6 months and be a part of management review subject.

The company has conducted an internal RSPO audit for the Selapan Jaya PKS on June 2, 2022. There are nonconformity in the supply chain aspect, among others related to the failure to show the contract with the buyer of PT Sumber Indah Perkasa. This discrepancy will be addressed at the 2022 management review.

The company has conducted a management review for 2021 on December 16, 2021. The management review discusses certification and sustainability, for example regarding the evaluation of regulatory compliance for units following the RSPO.

3.8.7

Selapan Jaya POM has record FFB from certified and uncertified source in Mass Balance Data. Below is the detail of FFB certified and uncertified during 12 month ago (November 2021 – October 2022).

Month	FFB Certified (Kg)	FFB Non-Certified (Kg)
November 2021	13,966,320	2,218,178
December 2021	9,626,457	1,360,111
January 2022	6,573,559	1,036,245
February 2022	5,302,263	567,858
March 2022	6,098,041	878,239
April 2022	6,749,501	2,642,494
May 2022	9,613,624	2,267,449
June 2022	19,117,336	1,529,260
July 2022	22,842,816	1,600,695
August 2022	27,089,641	2,508,006
September 2022	27,696,770	2,836,620
October 2022	27,121,450	2,430,861
Total	181,797,778	21,876,016

License period of Selapan Jaya RSPO Certificate is from 25 June 2022. The projection for FFB certified from estate and scheme or associated is 200,000 MT and actual production of FFB certified from July – October 2022 is 104,750,677 kg or 104,750.68 MT. Based on explanation above, there is no overproduction of FFB certified.

Based on document review, mechanism for handling of nonconforming FFB and/or documents is also presented in Procedure of RSPO supply chain mechanism document No. P-SAG-PKS-PRS-14 (Rev. 03) dated 07 July 2020, as revision to procedure dated 27 July 2019.

3.8.8

Certification unit shows certified product sales documents, for example:

Delivery order for contract no. 010/PK/SC/SA/0522 dated 9 May 2022. This document has explained the identity of the buyer, supply chain model, certificate number, and purchase tonnage. Then one of example of the weigh-in ticket for the contract was shown with transaction number TLM414656 dated 17 June 2022. The weigh-in ticket included the RSPO certificate number, RSPO unique number, transportation identity, supply chain model, delivery date, and document issue date, for example:

Weigh in ticket number: TLM412997

RSPO certificate number: MUTU-RSPO/142

RSPO Unique number: 22061216

Transportation identity: BE9224CF

Supply chain model: MB

Delivery date: 4 June 2022

Document issue date: 4 June 2022

3.8.9, 3.8.10

The certification unit shows a list of contractors for transporting CPO of Selapan Jaya POM for the 2022 period which explains the name of the transporter, contract number, product, and address of the transporter. From the document, there are 11 CPO transporters, while the PK is regulated by the buyer. Based on interviews with management representatives, it is known that there are contractors.

Then showed an example of the CPO transport contract No. 001/CPO/SA/AW/I/2022 between PT Sampoerna Agro and CV Alam Wijaya on 3 January 2022. The contract has informed the transporter willingness to provide access to CB if it is necessary to conduct an audit of the contractor. The statement is contained in Article 13, clause 13.10. based on interview with

3.8.11

The company shows a list of contractors for transporting CPO of Selapan Jaya POM for the 2022 period which explains the name of the transporter, contract number, product, and address of the transporter. From the document, there are 11 CPO transporters, while the PK is regulated by the buyer. Based on previous audit records, it is known that there are 3 contractors for transporting RSPO certified products. The contractors transporting CPO are CV Alam Wijaya, CV Rizki Pratama Anugrah, and PT Maju Bersama Anggiat Miduk. So, certification unit needs to make sure to notify CB before the next audit if there is an additional use of contractors (Opportunity for Improvement)

3.8.12

Selapan Jaya Mill has record and balance of all RSPO CSPO and CSPK, non-certified products produced, as well as presented in the Table below. As information, mass balance record is also provided from 2020 – October 2022. Other documentation such as weigh in ticket from 2020 also can showed to auditor during observation to weighbridge station.

Crude Palm Oil

Period	CPO Production (mt)			CPO Dispatch (mt)		
	RSPO Certified	Non-Certified	Total	RSPO	Other Scheme	Non-Certified
Nov-21	2,969.30	476.54	3,445.84	1,500.00	1,084.71	1,000.00

Des-21	2,134.66	319.82	2,454.48	-	1,845.91	500.00
Sub Total	5,103.96	796.36	5,900.32	1,500.00	2,930.62	1,500.00
Jan-22	1,349.77	209.65	1,559.42	-	1,767.77	-
Feb-22	1,130.93	118.27	1,249.20	-	1,150.00	-
Mar-22	1,202.04	176.55	1,378.59	-	1,250.00	-
Sub Total	3,682.74	504.47	4,187.22	-	4,167.77	-
Apr-22	1,392.03	582.49	1,974.52	-	1,355.31	-
May-22	1,756.67	452.50	2,209.17	-	2,038.79	-
Jun-22	3,657.83	290.65	3,948.48	-	1,355.90	-
Sub Total	6,806.53	1,325.64	8,132.17	-	4,750.00	-
Jul-22	4,295.54	301.95	4,597.49	-	1,379.66	-
Aug-22	5,054.09	475.79	5,529.88	-	6,682.25	-
Sept-22	5,351.38	548.91	5,900.29	-	5,147.54	-
Sub Total	14,701.01	1,326.65	16,027.66	-	13,209.45	-
Oct-22	5,241.28	481.20	5,722.48	750.00	5,918.54	-
Total	35,535.52	4,434.32	39,969.84	2,250.00	30,976.38	1,500.00

Palm Kernel

Period	PK Production (mt)			PK Dispatch (mt)		
	RSPO Certified	Non-Certified	Total	RSPO	Non-Certified	Other Scheme
Nov-21	735.87	118.20	854.07	329.69	598.31	-
Des-21	524.81	84.61	609.42	307.23	276.57	-
Sub Total	1,260.68	202.81	1,463.49	636.92	874.88	-
Jan-22	350.98	58.89	409.87	243.09	262.68	-
Feb-22	294.21	31.35	325.56	163.53	24.62	-
Mar-22	335.55	52.96	388.51	251.42	220.82	-
Sub Total	980.74	143.20	1,123.94	658.04	508.12	-
Apr-22	437.72	171.31	609.03	145.70	254.54	-
May-22	466.34	119.86	586.20	22.77	522.15	-
Jun-22	946.43	77.70	1,024.14	356.94	650.21	-
Sub Total	1,850.49	368.87	2,219.37	525.41	1,426.90	-
Jul-22	1,193.49	86.12	1,279.62	228.52	320.47	-
Aug-22	1,413.86	138.71	1,552.57	421.34	1,507.64	-
Sept-22	1,586.38	166.92	1,753.30	179.99	1,302.04	-
Sub Total	4,193.73	391.75	4,585.49	829.85	3,130.15	-
Oct-22	1,521.32	145.50	1,666.82	213.22	1,523.49	-
Total	9,806.96	1,252.13	11,059.09	2,863.44	7,463.54	-

Based on table above, there are CSPK sold as conventional as much as 6,211.41 Ton and CSPO sold as other scheme 30,976.38 Ton.

3.8.13, 3.8.14

Selapan Jaya POM has determine the extraction rate of oil and kernel. Based on production data from Nov 2021 – Oct 2022, the extraction rate for CPO is 19.61% and PK is 5.43%. This extraction rate is determined from the FFB, CPO, and

PK production. The extraction rate is updated periodically every month based on actual production of CPO and PK and also FFB processed.

3.8.15

Selapan Jaya POM has only implementing RSPO mass balance supply chain module.

3.8.16

Removed Stock

Based on mass balance data for the period November 2021 – October 2022, there are certified products that are sold conventionally. From the palm trace, it appears that there are no certified products that have been removed. Based on interviews with management representatives, certified products that are sold conventionally will be removed every 6 months for palm kernel and for CPO will be removed 10 days before the license period ends. The company then showed the Supply Chain System & Traceability Procedure No. P-SAG-PKS-PRS-14 3rd revision dated 7 July 2020. From this procedure, it was informed that “every six-month period during the palm trace license period, the certification coordinator will calculate the number of RSPO certified CSPK that are sold as non-sustainable palm kernels. And inform the amount to the marketing manager. The marketing manager will remove stock according to that amount 10 days before the license expires, the remaining stock must be removed.

Shipping announcements.

The company shows examples of shipping announcement documents for CSPK sales, including:

- Shipping announcement No. TR-e21fd032-4e8d for the sale of 150MT of CSPK to PT Sumber Indah Perkasa for contract number 004/PK/SC/SA/0122.
- Shipping announcement No. TR-093004e9-e263 for the sale of 150 MT of CSPK to PT Sumber Indah Perkasa for contract number 010/PK/SC/SA/0522 and announced on August 24, 2022

Then one of example of the weigh-in ticket for the contract was shown with transaction number TLM414656 dated 17 June 2022. The weigh-in ticket included the RSPO certificate number, RSPO unit number, transportation identity, supply chain model, delivery date, and document issue date. The weigh in ticket is linked with shipping announcement No TR-093004e9-e263. From these documents it can be concluded that shipping announcement documents are made no later than 3 months after product delivery.

3.8.17

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

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

The company have had policy related to nondiscrimination and equal opportunity written on CH policy dated 1 October 2019 which stated “*To respect and uphold human rights, including the right of employees to form labor unions and discuss issues collectively. We neither discriminate based on race, ethnicity, nationality, religion, physical disabilities, gender, sexual orientation, membership in labor unions, political affiliations, nor age. No forced nor illegal labor. To respect human rights activists*”.

KUD already has the Joint Policy and Commitment that has been signed by KUD management/administrators. For example, for KUD Bina Sejahtera it was signed on January 10, 2022. The joint policies and commitments of KUD are explained as follows:

- **Respect human rights, including the right of all workers to associate and bargain collectively. Do not discriminate against race, ethnicity, national origin, religion, physical disability, gender, sexual orientation, trade union membership, political affiliation or age. No forced labor and illegal workers. Respect human rights defenders**

- Preventing sexual harassment and violence for all workers and protecting reproductive rights, especially for women workers. Do not employ children under the age of 18
- Prevent environmental pollution and carry out land clearing without burning and not clearing new land in protected areas, HCV areas, peatlands, forests with high carbon stocks and protect flora and fauna that are endangered

The company has conducted socialization related to company policies. For example, :

- Socialization report related to OHS, vision and mission, **company policies**, whistle blowing, communication procedures, use of PPE, waste management and MSDS on 3 March 2022 attended by 39 participants
- Socialization report related to OHS, vision and mission, **company policies**, whistle blowing, communication procedures, use of PPE, waste management and handover of CLA on 21 June 2022 attended by 26 participants

Based on interviews with employees and contractors, it can be concluded that they understand human rights policies. Based on interview with stakeholder such as government agency, community around, representatives of labor union, and workers known that there is no indication of human rights violation.

4.1.2

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

Status: Comply

4.2

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

4.2.1; 4.2.2

Company has a mechanism of complaint and grievance handling written in *SOP Komunikasi, Partisipasi, dan Konsultasi* (P-SAG-HA-CA&L-08 on 01 August 2019). Complain from worker can be submitted to worker's supervisor verbally or written and complaint from external stakeholders can be submitted to manager, CA&L department, sustainability unit, and human resource and services and will protect identity reporter.

The procedure above has explained about the person in charge of receiving and resolving complaints (external and internal officers including HRD), response timeframe, confidentiality of the reporter and whistleblower, until further handling of complaints is possible to a tripartite level. (Mediation and settlement by government). Procedure is available in Bahasa Indonesia and if there is any complaints/grievances that the resolution that has not found mutually, the complainants can bring that compliance to RSPO Complaints System.

Based on the results of communication with cooperative administrators, company representatives and representatives of village it was found that there were no illiterate parties around the certification unit. To ensure that the system is understood by all parties, the company conducts outreach to representatives who can read and write. For KUD, the complaint mechanism is contained in SOP for Communication, Participation and Complaints (External and Internal) No. SOP SA-Plasma-PP-CA&L-01 dated 1 April 2017

The results of interviews with workers and labor union known that workers understand the grievance mechanism. Complaints can also be submitted to labor union. From the results of the interview, it was stated that workers' complaints were usually related to complaints about housing improvements and had been followed up by the company. From the results of the interview with KUD's workers, known that there are no complaint to KUD.

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

4.2.3

Complaint from internal stakeholder is documented in log book of stakeholder communication. Based on searches from the internet (<https://mitrapolri.com/hotman-gugat-pt-sampurna-agro-karena-tak-bayar-pesangon/>), it is known that there are complaints related to employment. The company has shown documentation of the progress of complaint handling in the form of a Decision Letter from the Industrial Relations Court at the Palembang District Court Decision Number 81/Pdt.Sus-PHI/2022/PN.Plg dated November 21, 2022. From this decision it is known that the company is required to pay compensation due to termination to Mr Hotman. From the results of interviews with management, information was obtained that compensation had not been given according to the court's decision because the plaintiff had not accepted the decision and planned to take the case to a higher level.

Based on the results of the complaint logbook verification, it was found that there were no complaints at the KUD and there were no internal complaints at the certification unit. In addition, the results of interviews with surrounding villages, contractors and related agencies, it is known that there were no complaints to the company.

4.2.4

Company has a mechanism of complaint and grievance handling written in *SOP Komunikasi, Partisipasi, dan Konsultasi* (P-SAG-HA-CA&L-08 on 01 August 2019). Complain from worker can be submitted to worker's supervisor verbally or written and complaint from external stakeholders can be submitted to manager, CA&L department, sustainability unit, and human resource and services and will protect identity reporter. Interview with worker in mill and estate, it is known that workers understand how to deliver their complaint if any.

The procedure above has explained about the person in charge of receiving and resolving complaints (external and internal officers including HRD), response timeframe, confidentiality of the reporter and whistleblower, until further handling of complaints is possible to a tripartite level. (Mediation and settlement by government). Procedure is available in Bahasa Indonesia and if there is any complaints/grievances that the resolution that has not found mutually, the complainants can bring that compliance to RSPO Complaints System.

The results of interviews with workers and labor union known that workers understand the grievance mechanism. Complaints can also be submitted to labor union. The results of interviews with contractors and representatives of village around indicated that the village and contractors had understood the grievance mechanism.

Status: Comply

4.3

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

4.3.1

The company has contributed to community development and documented its realization for the 2021 – 2022 period. The following is an example of CSR activities that have been carried out by the unit of certification.

- Construction of a mosque in Kerta Mukti Village from KUD Bina Sejahtera on 12 February 2022.
- Provision of vaccination sites and assistance with vaccination activities in Mesuji Raya District
- Improving the quality of basic education (character, literacy and numeracy) in Pedamaran Timur and Sungai Menang.
- Social service for flood disaster in Embacang Village.

Unit of certification also has developed plantation community as it been a part of Selapan Jaya Mill RSPO scope certification. Furthermore, based on interview with presentative from surrounding communities, it was known that the CSR is annually carried out by the unit of certification which had implemented on various aspect such as infrastructure and economic development, community health and sanitation, education, social culture and religion.

Based on results of interviews with Embacang Permai, Pulau Geronggang, and Maribaya Village representative, it is known that communication between company and surrounding community is good. From the interview results, it was conveyed that the company had provided CSR assistance to the surrounding community in accordance with the identification needs.

The CSR made based on the results of consultation with local community, included the SIA review was carried out by

involving the local community, in a discussion group forum activity for the district level conducted on April 7 2021, 8 local villages in 3 Districts (Mesuji Raya, Pedamaran and Pedamaran timur) conducted from March to October 2021.

Status: Comply

4.4

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

4.4.1

Hikmah Dua Estate of PT Telaga Hikmah and Selapan Jaya Mill of PT Sampoerna Agro

- Unit of certification has **location permit** as presented in document Decree of Sumatera Selatan Governor No. 784.a/SK/II/1993 dated 18 October 1993 about location permit for PT Telaga Hikmah (Hikmah Dua Estate) for area covers **± 10,000.00 ha** where situated in Mesuji Sub District, Ogan Komering Ilir District (OKI).
- Unit of certification has two (2) **plantation business permit (IUP)** for oil palm plantation and oil palm processing as presented in the following OKI Regent Decrees:
 - Decree No. 324/KEP/D.PERKE/2011 dated 24 August 2011 appointed to PT Telaga Hikmah for oil palm plantation in area covers **16,588.93 ha**.
 - Decree No. 221/Kep/D.Perke/2010 appointed to Selapan Jaya Mill of PT Sampoerna Agro for oil palm plantation in area covers 3,243.46 ha and oil palm processing mill at building land title (HGB) **118.595 ha** wit processing capacity **120 ton FFB/hour**.
- Unit of certification has **Land Title (HGU)** for Hikmah Dua Estate of PT Telaga Hikmah and **Building Land Title (HGB)** for Selapan Jaya Mill of PT Sampoerna Agro for total area covers **3,120.00 ha** and **118.595 ha**, respectively, summarized as follows:
 - Decree of BPN Head No. 20/HGB/BPN/2001 dated 27 July 2001 about HGB for PT Selapan Jaya (Selapan jaya Mill) for area covers 1,185,950 m². From this decree, issued HGB Certificate No. 01 dated 17 September 2001 for area covers 1,185,950 m² (or about **118.595 ha**) that valid for 30 years, or up to 16 September 2031.
 - Decree of BPN Head No. 02/HGU/BPN/2004 dated 07 January 2004 about HGU) of PT Telaga Hikmah for area covers 7,175.60 ha. From this decree, issued three Certificates, which certificate included on the scope of certification has shows through of HGU Certificate No. 07 dated 13 January 2004 for area covers **2,994.00 ha** that valid for 35 years, or up to 12 January 2039.
 - Decree of BPN Head No. 01/HGU/BPN-26/2004 dated 19 October 2004 about HGU of PT Telaga Hikmah for area covers 126.00 ha. From this decree, issued HGU Certificate No. 12 dated 24 November 2004 for area covers **126.00 ha** that valid for 35 years, or up to 23 November 2039.

Associate Smallholders

In ASA 1.1, there are 5.245 smallholder has land rights in form of SHM total **11,138.88 Ha**. Land rights is in form of SHM, so status of the land belongs to farmers themselves.

4.4.2, 4.4.4, 4.4.5, 4.4.6

Mechanism of land compensation to previous land owner is presented in procedure No. P-SAG-HO-CA&L-03 dated 01 September 2017. Up to recertification assessment in November 2021, there is no new land acquisition since 2003. Process of negotiation of land compensation has conducted through participatory approach, FPIC manners and did not diminish any legal rights and/or customary rights. Land owners are given the freedom to release their land without any coercion.

Based on interview with representative of Embacang Permai, Pulau Geronggang, and Maribaya Village, it is known that the villagers is willing to hand over the land to be managed by the company and get the part of scheme smallholder. There is no re-claim from villagers until now. Based on interview with previous land owner in Pulau Geronggang, it is known that process of negotiation of land compensation has conducted through participatory approach and FPIC manners. There are not many lands owner exist in the village. Some of previous land owner has passed away or has moved to another village or area. The land owner that can be interviewed is 2 people.

4.4.3

Participative map is available in scale 1:18,000. The making of map has been carried out through focus group discussion

(FGD) to the previous land owners as respective stakeholders. There are no customary right within unit of certification operational areas. During 2020 to November 2021, there is no process of land compensation payment, nor conflict related to land occupation.

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, 4.5.6, 4.5.7, 4.5.8

There is no new land acquisition or expansion that conducted by Hikmah Dua Estate and 11 associate smallholders. Based on interview with representative of previous land owners and surrounding communities, it was known that process of compensation has been carried out smoothly, transparent, voluntary and fair through participative and FPIC approach. Process of compensation or acquisition has conducted through FPIC manners and did not diminish any legal rights and/or customary rights

Status: Comply

4.6

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

4.6.1, 4.6.2, 4.6.3, 4.6.4

The Company has Land Compensation Procedure (P-SAG-HO-CA&L-03) dated 1 September 2017. Based on interview with representative of Pulau Geronggang Village, it is known that there is no legal or customary rights in PT Sampoerna Agro and there is no new land acquisition.

The previous land acquisition document has been verified, as well as consultation with previous land owner, known that the land acquisition has been conducted in FPIC manner, in accordance with SOP of Land Compensation Procedure. The procedure has been disseminated to the community parties with appropriate forms and languages (*Bahasa Indonesia*). The process starts from identification and mapping followed by measurement and physical check of the field then the social capital team will negotiate the price witnessed by Village Officials.

Status: Comply

4.7

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

4.7.1, 4.7.2, 4.7.3

The company has not carried out any new planting's activities. Based on interview with representative of Embacang Permai, Pulau Geronggang, and Maribaya Village and previous land owner, there is no legal and customary rights in their respective area. Originally, their area was transmigrant area. Also, there is no new planting activity in Hikmah Dua Estate.

The previous land acquisition document has been verified, as well as consultation with previous land owner, known that the land acquisition has been conducted in FPIC manner, in accordance with SOP of Land Compensation. The procedure has been disseminated to the community parties with appropriate forms and languages (*Bahasa Indonesia*). The process starts from identification and mapping followed by measurement and physical check of the field then the social capital team will negotiate the price witnessed by Village Officials.

Status: Comply

4.8

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

4.8.1, 4.8.2, 4.8.3, 4.8.4

Mechanism of land compensation to previous land owner is presented in procedure No. P-SAG-HO-CA&L-03 dated 01 September 2017. Based on interview with previous land owner of Pulau Geronggang, it is known that there are community areas that have not been compensated by the company because some land owners are not yet willing to be compensated. Then, from interviews with representatives of Pulau Geronggang village, it was discovered that the land owners who were

not yet willing to be compensated were farmers/members of KUD Puger Mulya. The KUD Puger Mulya is not included in the scope of the RSPO. However, the company showed a list of CPCL plots that received KUD Puger Mulya compensation, consisting of 152 participants with a total area of 2,155.65 m².

Of these participants, there were 111 people who had been compensated, and the remaining 41 people were not willing to be compensated. Then shown examples of compensation documents, among others, as follows.

- SHM compensation payment document No. 215 Plot No. 393.
- Statement letter from Sri Hartati as the legal owner for SHM No. 215 signed in September 2022 along with the map.
- Pre-conversion plasma KUD Puger Mulya settlement agreement with PT Telaga Hikmah no. 145/TH/KUD-PM/IX/2022 which was signed by the plot owner and witnessed by the head of the KUD.
- Receipt of compensation dated October 1, 2022

Other than that, there is no land conflict with Hikmah Dua Estate.

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1

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

5.1.1

The company has a 11 plasma (scheme smallholder), such as Marga Mulya Cooperative, Bina Tani Mulya coopeartive and Sedia Mukti Cooperative, as well as cooperating with many local contractors/businesses. Current and previous prices paid for Fresh Fruit Bunches (FFB) are publicly available. The price of FFB determined by following the Provincial price issued by the Plantation Agency of Sumetara Selatan. The price of FFB can be accessed directly by the public through the through circulars letter that sent by Plantations agency of Sumetara Selatan Province all smallholders and partner companies with WA group smallholder. All cooperative members can also access price information posted on the cooperative office notice board or ask the assistant partner directly.

PT Sampoerna Agro, as the owner of the processing plant, has a cooperation agreement with supplier plantations which contains information related to the price of FFB. For example, in the Cooperation Agreement between PT Sampoerna Agro and Cooperative members Jaya Makmur (No: 006 / GMP-E / VII / 2018) especially in Article 5 explains:

- The purchase price for the production of oil palm fresh fruit bunches is determined based on the Minister of Agriculture Decree No. 14 of 2013
- The procedure for fixing the purchase price of FFB produced by farmers is carried out by the Sumatera Selatan provincial pricing team in accordance with the Sumatera Selatan Governor Regulation (No. 28/2006) concerning Guidelines for the Implementation of the Purchase Price of FFB for Planters.
- The purchase price for plasma smallholder FFB by the nucleus company is determined based on the price formula as stated in MOA 17/2010 using data on the price of CPO, palm kernel and the Provincial "K" index that has been decided by the Provincial FFB Purchasing Price Team, with the purchase price formula TBS as follows: HTBS (FFB Price) = K (Hms x Rms + His x Ris)
- The FFB price is the same as the smallholder's FFB price issued by the Plantation Office of Sumatera Selatan Province based on the year of planting.

5.1.2

Based on an interview with Batu Sagulak Ramay Malaju Cooperative is known by the that the price of FFB from partnership was in accordance with prices set by the Plantation Agency and in accordance with the agreement of both parties and there are no complaints regarding the payment of FFB. The Regular updating of FFB prices to cooperation via WhatsApp group and directly short message send to member. The CH explains the FFB Pricing to smallholders, such as regular minutes of meeting with smallholders on 8 August 2022.

5.1.3

Base on document verification on the agreement letter between the company and Bina Tani Mulya Cooperative and Sedia Mukti cooperative has been known and signed by representatives of both parties and is known by the Regional Government. The results of interviews with cooperation members revealed that the price of FFB from Smallholders (Bina

Tani Mulya Cooperative and Sedia Mukti cooperative) was in accordance with prices set by the Plantation Agency and in accordance with the agreement of both parties and there are no complaints regarding the payment of FFB. From the results of the interview, it was also conveyed that every payment as well as in the activity / meeting for revenue sharing was always attached with a price list that issued by Plantation Agency.

5.1.4

The company has an agreement contract with cooperative and FFB Supplier Each contract document, signed by both parties as evidence that a work agreement has been agreed. Contract agreement documents are kept by both parties, which will be used as legal references. Base on document verification on the agreement letter between the company and Bina Tani Mulya Cooperative and Sedia Mukti cooperative has been known and signed by representatives of both parties and one is a woman who is a member.

5.1.5

PT Sampoerna Agro, as the owner of the processing plant, has a cooperation agreement with supplier plantations which contains information related to the price of FFB. For example, in the Cooperation Agreement between PT Sampoerna Agro and Cooperative members Jaya Makmur (No: 006 / GMP-E / VII / 2018) especially in Article 5 explains:

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- The FFB price is the same as the smallholder's FFB price issued by the Plantation Office of Sumatera Selatan Province based on the year of planting.

Base on document verification and public consultation with cooperative there are have understood the contract agreement they have made as evidenced by the agreement signed by both parties (the company and the plasma cooperative or the supplier). In the document, there is a statement that the price set to determine the FFB selling price is the price set by the Sumatera Selatan Provincial Plantation Agency Price Fixing Team, so the parties hereby declare that they will obey and obey the price fixing so that one party and the other party are not entitled to request an increase or decrease in price. The agreement (MoU) or contract regulates completely and clearly the rights and obligations of the two parties, the technical provisions of the agreement / work to a fair payment method agreed by both parties. There are also specifications and implementation requirements as well as sanctions that must be met by the second party.

5.1.6

The certificate holder has records related to the purchase / payment of FFB from suppliers such as KUD, for example:

- Record of Debit Note for Plasma Farmer KUD Madya Karya Bhakti in August 2022 for payment of FFB as much as 3.080 ton of FFB.
- Record of Debit Note for Plasma Farmer KUD Serba Usaha in August 2022 for payment of FFB as much as 883-ton FFB.

The recording is known to have been signed by both parties (KUD management and the company). From the recording, it is also known that the payment has been in accordance with the FFB price set by the relevant agency according to the year of planting.

5.1.7

The certificate holder has shown the recorded evidence of the calibration results of the weighing equipment at the Selapan Jaya POM in the following records:

- Information on Testing Results (No.: 682/Disperindag/Bid.Met/X/2022) Metrological Sector, Industry and Trade Office of Prabumulih City Government on October 31, 2022 which is valid until October 2023. (Scales No. 1)

- Information on Test Results (No.: 683/Disperindag/Bid.Met/X/2022) Metrological Sector, Industry and Trade Office of Prabumulih City Government on October 31, 2022, which is valid until October 2023. (Scales No. 2).

5.1.8

The company conducts a campaign related to RSPO certification to oil palm farmers around the company by conducting public consultations to nearby villages, this can be clarified from the results of public consultations with the surrounding community. Apart from that, the majority of the people around the company are members of cooperatives that work with the company and currently have followed the RSPO certification. The company shows the Minutes of the annual meeting related RSPO certification on 4 January 2022 in Kerta Mukti Village.

5.1.9

The company has SOP for Communication, Participation and Consultation (P-SAG-HA-CA&L) which explains communication mechanisms with external and internal stakeholders. The cooperative unit also has procedures regulates about communication mechanisms written on SOP for Communication, Participation and Complaints (SA-PLASMA-PP-CA&L-01). The procedure is available in Bahasa Indonesia and English. Based on Incoming letters from external stakeholder logbooks period 2021 until 2022, there's no complaint from farmers, especially cooperative unit members.

Status: Comply

5.2

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

5.2.1

The company can show evidence of consultation with smallholders outside the scope of the current certification. Which consists of KUD assisted (non-scope) or independent smallholders and third-party suppliers regarding RSPO, benefits of RSPO and expectations needed to improve the standard of living. The socialization was carried out dated 11 July 2022 attended by 30 representatives.

5.2.2

The company can show evidence of consultation with smallholders outside the scope of the current certification. Which consists of KUD assisted (non-scope) or independent smallholders and third-party suppliers regarding RSPO, benefits of RSPO and expectations needed to improve the standard of living. The socialization was carried out dated 11 July 2022 attended by 30 representatives.

The certification unit has been develops and implements livelihood improvement programmers included The CSR development and its realization for the 2021 – 2022. The CSR made based on the results of consultation with local community, included the SIA review was carried out by involving the local community, in a discussion group forum activity for the district level conducted on April 7 2021, 8 local villages in 3 Districts (Mesuji Raya, Pedamaran and Pedamaran timur) conducted from March to October 2021.

5.2.3

Based on interviews with representatives and committee of smallholder cooperative representatives, it was known that support legality of FFB produced through assistance towards managing the legality of land owned by farmers through assistance in the management of Land Title certificates since the beginning of the development of oil palm plantations or agreement has being made. The process was still ongoing. For farmers outside the scope of certification (Independent) as described in indicator 2.3.2. the support carried out to support land legality includes data collection on land ownership, mapping and pinpointing the location of FFB sources. current conditions for areas outside the scope of certification, there are still many who do not have SHM/land legality. The socialization and awareness of the importance of the legality of FFB was delivered dated 11 July 2022.

5.2.4

Unit of certification has provided training related to pesticide management and application, as well as safe working practices to smallholders, as follows:

- Training in KUD Marga Mulya: 21 February 2022 for hazardous and chemical material handling and application; 21 March 2022 for emergency response; 11 July 2022 for OSH training

- KUD Bina Tani Mulya: 22 August 2022 for hazardous and chemical material handling and application and 19 September 2022 for OSH and first aid training.
- KUD Sedia Mukti: 18 July 2022 for first aid training, 28 October 2022 for agronomy matters included pesticide application and 23 May 2022 for emergency situation.

Based on interview with smallholders' representatives from 4 sampled cooperatives, it was known that training on safe working practices in agrochemical application has conducted annually. Furthermore, smallholders are able to explain and demonstrate technical matters in accordance with procedure such as type of PPE used, symbol of hazardous, pesticide mixing, wind flows consideration during application, special medical checkup, etc.

5.2.5

Development of smallholder's plantation is reported publicly by the unit of certification, as shows through several report such as semester report of Plantation Business Development Report or "Laporan Perkembangan Usaha Perkebunan Tahap Operasional" (LPUP) semester I years 2022 dated 11 July 2022. Those documents had sent to the Regent of OKI and several Agencies in Ogan Komering Ilir District such as Plantation Agency, National Land Agency and Investment Board.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1; 6.1.2

The company have had policy related to non-discrimination and equal opportunity written on CH policy dated 1 October 2019 which stated *"To respect and uphold human rights, including the right of employees to form labor unions and discuss issues collectively. We neither discriminate based on race, ethnicity, nationality, religion, physical disabilities, gender, sexual orientation, membership in labor unions, political affiliations, nor age. No forced nor illegal labor. To respect human rights activists"*.

KUD already has the Joint Policy and Commitment that has been signed by KUD management/administrators. For example, for KUD Bina Sejahtera it was signed on January 10, 2022. The joint policies and commitments of KUD are explained as follows:

- **Respect human rights, including the right of all workers to associate and bargain collectively. Do not discriminate against race, ethnicity, national origin, religion, physical disability, gender, sexual orientation, trade union membership, political affiliation, or age. No forced labor and illegal workers. Respect human rights defenders**
- Preventing sexual harassment and violence for all workers and protecting reproductive rights, especially for women workers. Do not employ children under the age of 18.
- Prevent environmental pollution and carry out land clearing without burning and not clearing new land in protected areas, HCV areas, peatlands, forests with high carbon stocks and protect flora and fauna that are endangered.

The company has conducted socialization related to company policies. For example:

- Socialization report related to OHS, vision and mission, **company policies**, whistle blowing, communication procedures, use of PPE, waste management and MSDS on 3 March 2022 attended by 39 participants.
- Socialization report related to OHS, vision and mission, **company policies**, whistle blowing, communication procedures, use of PPE, waste management and handover of CLA on 21 June 2022 attended by 26 participants.

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

6.1.3

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

Unit Certification has shown a record of the implementation of employment procedures, for example:

Promotion

- Decree Letter No. 023/HRS/SK/Pr/II/2022 dated 11 February 2022 who was promoted to monthly employee.

Appointment of employees

- Memorandum No. 0008/HD/VI/2022 dated 3 June 2022 regarding the appointment of an employee with the initials IM
- Memorandum No. 0006/HD/VI/2022 dated 3 June 2022 regarding the appointment of employees with the initials PY
- Memorandum No. 0006/HD/VI/2022 dated 3 June 2022 regarding the appointment of an employee with the initials YT

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

6.1.4

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

6.1.5

The company already has a gender committee that handles issues related to women or issues related to gender. The structure of the gender committee consists of Protector, Coach, Chair, Coordinator of the Education and Training Division, coordinator of the services and assistance division, coordinator of the data and information division and coordinator of the economic empowerment division. There is representation of male workers/staff in the gender committee composition. The gender committee also has work programs such as:

- Socialization of the gender committee
- Regular meetings discussing gender related issues.
- Dissemination of complaint mechanisms in the event of sexual harassment or violence.
- Etc.

KUD also has gender committee that handles issues related to women or issues related to gender which is shown through the establishment decree, for example:

- KUD BTM → Formation of a gender committee based on Management Decree No. 01/KUD-BTM/VIII/2018 dated 11 August 2018
- KUD Marga Mulya → Formation of a gender committee based on Decree No. 060/KUD.MM/DS.TM/XI/2018 dated 21 November 2018

The results of interviews with representatives of the gender committee, interviews with women workers at both PT Sampoerna and KUD obtained information that there were no cases or complaints related to women's issues. From the results of the interviews, information was also obtained that there had never been a case of sexual harassment or violence.

6.1.6

The determination of wages at Unit certification is based on the minimum wage in Sumatera Selatan Province based on the Decree of the Governor of Sumatera Selatan No. 746/KPTS/Disnakertrans/2021 on November 18, 2021. The Minimum Wage for Sumatera Selatan Province District in 2022 is Rp. 3.144.446. Related to this, the company has Memo No. 003/RHP/II/2022 dated January 19, 2022, regarding wage determination in 2022 amounting to Rp 3.144.446.

The results of interviews with labor union and workers and also the verification of workers' wages e.g with worker ID

2014068858 and ID 2014068861 (worker with same work and same grade), it is known that the company has given the same wages for the same scope of work and in the same grade.

Status: Comply

6.2

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

6.2.1

The determination of wages at Unit certification is based on the minimum wage in Sumatera Selatan Province based on the Decree of the Governor of Sumatera Selatan No. 746/KPTS/Disnakertrans/2021 on November 18, 2021. The Minimum Wage for Sumatera Selatan Province District in 2022 is Rp. 3.144.446. Related to this, the company has Memo No. 003/RHP/II/2022 dated January 19, 2022 regarding wage determination in 2022 amounting to Rp 3.144.446.

As for KUD, it has also set a minimum wage for 2022 which is indicated in the Management Decree. For example, for KUD Bina Tani Mulya, the determination of employee wages is based on Management Decree No. 01/KUD-BTM/MBY/II/2022 dated February 10, 2022. From the decree it is known that KUD workers' wages are based on the minimum wage provisions stipulated in Governor's Decree No. 746/KPTS/Disnakertrans/2021 dated 18 November 2021 concerning the South Sumatra Province Minimum Wage of Rp. 3,144,446

The company shows list of the number of workers for the September/October 2022 as follows:

- KUD BTM → 205 workers including management.
- KUD Marga Mulya → 228 workers including management.
- Telaga Hikmah Estate → 421 workers
- Mill → 205 workers including staff.
- Contractor workers for example Duta Marga Lestarindo → 10 workers

6.2.2

Company has 2021-2023 Collective Labor Agreement between the company and the Sampoerna Agro Workers' Union. The CLA has been registered with the relevant agency based on the Decree of the Head of the South Sumatra Province Manpower and Transmigration Office No. 120/SK/Nakertrans/2022 dated 24 January 2022 valid from 28 December 2021 – 27 December 2023. The CLA has explained wages and work requirements in Indonesian, such as:

- Article 13 → Wages and review of wages
- Article 14 → Wage increase
- Article 15 → payment of wages
- Article 16 → Overtime work and overtime pay
- Article 18 → Working days and working hours
- Article 19 → Holiday
- Article 20 → Annual leave
- Article 21 → Menstrual leave, maternity leave, maternity
- Article 22 → Permission to leave duty

The unit of certification also shows the Employment Agreement for workers working in KUD. For example :

- Work agreement number 07/KUD-BTM/VII/2022 dated 12 July 2022 between KUD Bina Tani Mulya and workers for spraying activities.
- Work agreement number 25/KUD-BTM/VII/2022 dated 12 July 2022 between KUD Bina Tani Mulya and workers for harvesting activities.

The agreement has explained about wages and work conditions. The agreement has been registered at the Manpower Office. In addition, the certification unit has also shown submission of KUD manpower reports to the Ogan Komering Ilir District Manpower Office, such as:

- Submission of the KUD Bina Tani Mulya manpower report to the Manpower Office on 29 June 2022
- Submission of the KUD Bina Sejahtera manpower report to the Manpower Office on 26 October 2022
- Submission of the KUD Marga Mulya manpower report to the Manpower Office on 29 June 2022

- Submission of the KUD Sedia Mukti manpower report to the Manpower Office on 29 June 2022

The company has conducted socialization regarding the CLA. For example, the socialization documentation for workers' rank structure, CLA, job description and reproductive protection on 27 February 2022 was attended by 26 participants.

The auditor team has simulated the calculation of workers' wages by verifying payroll documents for September 2022 for example with ID 2013105588 (security) and KUD for example KUD Marga Mulya on November 2022 with initial KL (harvester). From the verification results, it is known that the company has paid wages according to the applicable regulations. In addition, the company also shows payroll documents that provide information related to compensation for all work performance.

6.2.3

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

- Payroll documentation that gives information on compensation for work performance. The results of the simulation of wages and overtime in September 2022, known that the company has paid overtime wages according to the workers' overtime hours and has complied with the applicable regulations. The simulation samples for overtime calculations for example:
 - For worker with ID 2013105588, has get overtime wages of Rp. 2.355.931
- Employee leave forms, such as:
 - Workers' annual leave with initials DN on September 2022 for 2 days
 - Maternity leave with initial RPS on July 4, 2022 for 3 months.
 - Maternity leave with initial MN on August 20, 2022 for 3 months
- Employee Attendance document every month which informs the number of attendances, leave, illness and others.

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

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

6.2.4

The results of field observations in housing areas and interviews with workers and labor union known that the company has provided housing facilities, infrastructure and facilities that are decent/in good condition to workers such as houses, clean water facilities, religious facilities, sports, first aid center (*puskeshun*) and others. The condition of the house is permanent and has good sanitation. From the interview, also known that in each housing location there kindergarten, trash bins and others.

6.2.5

Based on interviews with workers (harvesters, sprayers, maintenance, and mill operators), housing residents, labor unions and gender committees, it is known that workers have no difficulty in getting food sources because the company has provided cooperatives that sell daily necessities and the existence of vegetable sellers given access to sell at home. In addition, workers can buy these needs into markets around the area of the company with less difficult access.

6.2.6

The determination of wages at Unit certification is based on the minimum wage in Sumatera Selatan Province based on the Decree of the Governor of Sumatera Selatan No. 746/KPTS/Disnakertrans/2021 on November 18, 2021. The Minimum Wage for Sumatera Selatan Province District in 2022 is Rp. 3,144,446. Related to this, the company has Memo No. 003/RHP/II/2022 dated January 19, 2022 regarding wage determination in 2022 amounting to Rp 3,144,446.

In relation to DLW (Decent Living Wage), the company has tried to do Prevailing Wage calculations for each unit, which included samples of In-Kind Benefits, such as Housing, water, electricity for home, health/medical facilities, school for workers children, etc. As for the DLW calculation in 2022 with total Rp. 4,761,621. DLW calculation is based on actual and rational price at certification unit location.

6.2.7

During the surveillance assessment 1.1, it was found that the company had not shown any improvement related to the previous NC.

Minor raise to Major (Non-Conformity No. 2021.04)

- Based on the review of Hikmah Dua Estate's manpower documents, it is known that currently the certification unit still has 279 workers with PHL status (Free Daily Workers) who are employed for various types of work, such as harvesting and maintenance.
- Based on the results of observations and interviews with harvest workers at Hikmah Dua Estate, it is known that there are still workers with PHL status (Free Daily Workers) who work as harvest workers.
- In the explanation in Law no. 13 of 2003, which explains that the criteria for permanent work are work that is continuous, uninterrupted, not limited by time and is part of a production process in one company or work that is not seasonal. Where from this explanation, harvesting work is one of the permanent jobs and cannot be employed for workers with PKWT status (Specific Time Work Agreement) or PHL (Free Daily Workers), where this is again clarified in Kepmenaker No. 100 in 2004.
- The unit of certification has not yet been able to show evidence that the use of PHL workers (Free Daily Workers) has been carried out in accordance with Kepmenaker No. 100 of 2004, starting from working days and types of work that can be done.

The unit of certification has not been able to show sufficient evidence that non-permanent workers and casual daily workers are limited to temporary or seasonal work and are in accordance with the applicable laws and regulations.

6.2.7 Status: NonConformity No. 2021.04 with Minor raise to Major Category

6.3

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

6.3.1

The company have has policy related to nondiscrimination and equal opportunity written on CH policy dated 1 October 2019 which stated " *To respect and uphold human rights, including the right of employees to form labor unions and discuss issues collectively. We neither discriminate based on race, ethnicity, nationality, religion, physical disabilities, gender, sexual orientation, membership in labor unions, political affiliations, nor age. No forced nor illegal labor. To respect human rights activists*".

KUD already has the Joint Policy and Commitment that has been signed by KUD management/administrators. For example, for KUD Bina Sejahtera it was signed on January 10, 2022. The joint policies and commitments of KUD are explained as follows:

- **Respect human rights, including the right of all workers to associate and bargain collectively. Do not discriminate against race, ethnicity, national origin, religion, physical disability, gender, sexual orientation, trade union membership, political affiliation or age. No forced labor and illegal workers. Respect human rights defenders**
- Preventing sexual harassment and violence for all workers and protecting reproductive rights, especially for women workers. Do not employ children under the age of 18
- Prevent environmental pollution and carry out land clearing without burning and not clearing new land in protected areas, HCV areas, peatlands, forests with high carbon stocks and protect flora and fauna that are endangered

The company has conducted socialization related to company policies. For example, :

- Socialization report related to OHS, vision and mission, **company policies**, whistle blowing, communication procedures, use of PPE, waste management and MSDS on 3 March 2022 attended by 39 participants

- Socialization report related to OHS, vision and mission, **company policies**, whistle blowing, communication procedures, use of PPE, waste management and handover of CLA on 21 June 2022 attended by 26 participants

Based on interview with labor union known that company has given socialization related to guarantee freedom of association for workers/employees.

6.3.2; 6.3.3

As a form of policy implementation, a Worker's Union has been formed in the Company, as evidenced by evidence of registration of Labor Union Number 560/212/D.Nakertrans/HI/2021 dated 15 March 2021. KUD also has worker representatives who are appointed by workers through deliberations which are shown through:

- Minutes of the meeting for selecting workers' representatives for KUD Bina Tani Mulya on 19 September 2019, which was attended by 11 participants,
- Minutes of the meeting for selecting workers' representatives for KUD Sedia Mukti on 19 September 2022

The unit of certification shows minutes of meetings with labor unions, such as:

- Minutes of the meeting between KUD Bina Tani Mulya workers' representatives and KUD management on 17 March 2022
- Minutes of meeting between KUD Sedia Mukti worker representatives and KUD management on 26 July 2022
- Minutes of the meeting between the Sampoerna Agro labor union and the company on 18 April 2022

Based on interview with labor union known that company has given socialization related to guarantee freedom of association for workers/employees. Based on interview with labor union also known that there is no intervention related to election of workers representatives or in the implementation of any activities.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1; 6.4.2; 6.4.3; 6.4.4

The company has Policy to maintain morality is written in CH policy dated 1 October 2019 which stated *"To protect female employees at workplace by strongly prohibiting any sexual harassment and violence towards them, as well as protecting their reproduction rights. We do not employ underaged children and we do facilitate child care"*.

KUD already has the Joint Policy and Commitment that has been signed by KUD management/administrators. For example, for KUD Bina Sejahtera it was signed on January 10, 2022. The joint policies and commitments of KUD are explained as follows:

- Respect human rights, including the right of all workers to associate and bargain collectively. Do not discriminate against race, ethnicity, national origin, religion, physical disability, gender, sexual orientation, trade union membership, political affiliation or age. No forced labor and illegal workers. Respect human rights defenders
- **Preventing sexual harassment and violence for all workers and protecting reproductive rights, especially for women workers. Do not employ children under the age of 18.**
- Prevent environmental pollution and carry out land clearing without burning and not clearing new land in protected areas, HCV areas, peatlands, forests with high carbon stocks and protect flora and fauna that are endangered.

The company has conducted socialization related to company policies. For example:

- Socialization report related to OHS, vision and mission, **company policies**, whistle blowing, communication procedures, use of PPE, waste management and MSDS on 3 March 2022 attended by 39 participants.
- Socialization report related to OHS, vision and mission, **company policies**, whistle blowing, communication procedures, use of PPE, waste management and handover of CLA on 21 June 2022 attended by 26 participants.

The unit certification has also shown agreement with third parties that have explained the prohibition on employing children under 18 years of age, forced labor and workers from human trafficking, for example agreement No. 05/SPK/KUD-BTM/VII/2022 dated July 1, 2022.

The results of the verification of the labor list document, interviews with internal and external stakeholders, and field observations in operational area revealed that there was no indication of any workers under the age of 18.

Status: Comply

6.5

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

6.5.1; 6.5.2

The company has Policy to maintain morality is written in CH policy dated 1 October 2019 which stated *"To protect female employees at workplace by strongly prohibiting any sexual harassment and violence towards them, as well as protecting their reproduction rights. We do not employ underaged children and we do facilitate child care"*.

KUD already has the Joint Policy and Commitment that has been signed by KUD management/administrators. For example, for KUD Bina Sejahtera it was signed on January 10, 2022. The joint policies and commitments of KUD are explained as follows:

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The company has conducted socialization related to company policies. For example, :

- Socialization report related to OHS, vision and mission, **company policies**, whistle blowing, communication procedures, use of PPE, waste management and MSDS on 3 March 2022 attended by 39 participants
- Socialization report related to OHS, vision and mission, **company policies**, whistle blowing, communication procedures, use of PPE, waste management and handover of CLA on 21 June 2022 attended by 26 participants

The results of interviews with workers, especially female workers, revealed that the company had provided socialization related to policies to prevent sexual harassment and violence and protect reproductive rights. The company already has a gender committee to handle women's issues or problems. The results of interviews with representatives of gender committee and female workers revealed that there were no cases of violence or sexual harassment in the last 1 year. In addition, from the interviews known that the company has gave permission/maternity leave, menstrual leave and permission to breastfeed for female workers.

6.5.3

The company has identified the needs of new mothers on October 3, 2022 (Mill) and November 1, 2022, including for KUD. The identification results for the needs of new mothers include:

- The nutritional needs of the mother and fetus are met
- Protection from exposure to harmful chemicals and excessive fatigue
- Exclusive breastfeeding

The results of interviews with female workers and gender committee revealed that the company had given permission or time to breastfeeding mothers.

6.5.4

Company has a mechanism of complaint and grievance handling written in *SOP Komunikasi, Partisipasi, dan Konsultasi* (P-SAG-HA-CA&L-08 on 01 August 2019). Complain from worker can be submitted to worker's supervisor verbally or written and complaint from external stakeholders can be submitted to manager, CA&L department, sustainability unit, and human resource and services and will protect identity reporter.

The procedure above has explained about the person in charge of receiving and resolving complaints (external and internal officers including HRD), response timeframe, confidentiality of the reporter and whistleblower, until further handling of complaints is possible to a tripartite level. (Mediation and settlement by government). Procedure is available in Bahasa

Indonesia and if there is any complaints/grievances that the resolution that has not found mutually, the complainants can bring that compliance to RSPO Complaints System.

The results of interviews with workers and labor union known that workers understand the grievance mechanism. Complaints can also be submitted to labor union. As for complaints related to women's issues can be submitted through the gender committee.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1; 6.6.2

The results of the verification of the labor register documents, work agreement documents, interviews with labor unions and workers revealed no forced labor in the company. All workers who work are in accordance with the mutually agreed agreement or letter of appointment.

Based on interview with workers and labor union and employment document verification known that workers accept work voluntarily and freely, and following are not found during audit such as retention identity, recruitment fees, involuntarily overtime, lack of freedom to resigns, penalty for termination, debt bondage, withholding wages.

The company has a Collective Labor Agreement for 2021-2023 which explains the requirements for hiring workers including for temporary workers. As for the requirements for accepting workers in the CLA, do not ask for/withhold the workers' original documents. But only attach documents in the form of photocopies. The original documents are only shown at the time of receipt and not given to the company.

The company has been able to show a letter of employment agreement or letter of appointment of workers. Based on the verification results of the work agreement document and/or appointment letter as well as field observations, it is known that the worker has worked in accordance with the agreement/appointment letter.

Based on verification of agreement, known that the agreement has explained several working conditions, rights and obligations of workers, wages, leave, social security and others. The agreement has been signed by both parties. From the results of interviews with workers and representatives of workers through labor unions, it is known that the company has provided a copy of the agreement to the workers.

Status: Comply

6.7

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

6.7.1

The CH already has a OSH Committee decision letter including at KUD Sedia Mukti with a OSH Committee decision letter No. 905/SK/Nakertrans/2021 which was ratified by the Head of the Manpower and Transmigration of Sumatera Selatan Province on 23 June 2021 is valid for 3 years since it was stipulated, namely 23 June 2024 with the Chair of OSH Committee being the Head of KUD Sedia Mukti and the Secretary of OSH Committee on behalf of Nur Jamil who is a member of KUD Sedia Mukti who already has the Republic of Indonesia Minister of Manpower Decree No. 5/2152/AS.02.04/III/2021 regarding the appointment of General OSH Expert dated February 07th, 2022 which is valid until February 06th, 2025. General OSH Expert training certificate dated March 31st, 2021, with OSH expert authorization card No. 52681/PK3/AJ/16/2021/P1 which is valid until March 31st, 2024.

In addition, the certification unit has held regular meetings of the OSH Committee management which are held every month as has been done by the KUD Bina Sejahtera OSH Service Company management. For example, in the third quarter 2022 OSH Committee report, there are regular monthly meetings, including a meeting on September 26th, 2022, which was attended by 5 cooperative management members. The meeting discussed a number of matters including monitoring the inspection of employee PPE, quarterly OSH Committee reporting, inspection of the contents of the first aid kit, inspection of fire extinguisher, socialization of first aid by certified trained officers.

Based on the description above, it shows that the unit of certification already has a person in charge of Occupational Safety and Health (OSH) and records of periodic meetings between the person in charge and the workers are available.

6.7.2

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

- Emergency Preparedness and Response Procedure No: P-SAG-PKS-DRR-01, which was approved by the Chief Operational Officer on 1 September 2009
- SOP for accident handling and emergency situation control No. SA-PLASMA-PP-DRR-01 was approved by the Managing Director on 01 April 2016 to anticipate, handle and minimize the impact of emergencies on employees, KUD assets and the plantation environment. Efforts to prevent and control land fire hazards in plantation areas quickly and precisely can be carried out properly. This procedure refers to emergency response in the event of a spill that causes environmental pollution (B3 and LB3), in the event of a tornado, riots, earthquakes, floods, forest/land fires.

The certification unit has first aid officers who have attended training on occupational safety and health (K3) in the field of First Aid for Accidents at Work, including in KUD Bina Tani Mulya there are First Aid officers a.n Siswanto who have attended training on 5 - 8 July 2018 regarding Coaching Occupational Health and Safety in the field of First Aid for Accidents organized by the Ministry of Manpower and Transmigration of Sumatera Selatan Province in collaboration with PT. Sampoerna Agro. In addition, at Hikmah Dua Estate there are 3 officers who already have first aid certificates approved by the Ministry of Manpower and Transmigration of Sumatera Selatan Province, namely:

- First aid officer a.n Dedi Saputra, with certificate No. 560/189/P3K/Nakertrans/2022 which was ratified on March 02nd, 2022 and is valid until March 02nd, 2024
- First aid officer a.n Purnomo with certificate No. 560/212/P3K/Nakertrans/2022 which was ratified on March 02nd, 2022 and is valid until March 02nd, 2024
- First aid officer a.n Abdul Wakit with certificate No. 560/184/P3K/Nakertrans/2022 which was ratified on March 02nd, 2022 and is valid until March 02nd, 2024

The work accident records are found in OSH monitoring, evaluated during the monthly OSH Service Company meeting, recorded and reported every 3 months to the Manpower and Transmigration Agency of Sumatera Selatan Province. Based on observations on harvesting, it was found that the Harvest Foreman in Division I Hikmah Dua Estate carried a complete first aid kit of 21 types and there were records of their use. SHE staff checks the completeness of the first aid kit once a month and will refill it if the first aid kit is used up.

Based on the description above, it shows that the company has emergency response procedures and work accidents that are clearly understood by all workers, there are workers in the field who have attended First Aid Training (P3K) and records of all work accidents are kept and reviewed periodically

6.7.3

Based on the results of the field visit, the following facts were found:

- In Division I Hikmah Dua Estate :
 - Block 21B Harvesting Work, there are 2 harvesters not wearing helmets and gloves and 1 harvester wearing personal safety shoes
 - Block 20D Harvesting Work, there is 1 harvester not wearing a helmet and 2 harvesters not wearing gloves and wearing personal safety shoes
- At Hikmah Dua Estate in Division III Block 33C, loose-leaf collectors use their own gambier shoes
- In the Hikmah Dua Estate Workshop there are welder operators without using aprons
- At PKS Selapan Jaya:
 - Nut and Kernel Station, 1 Operator does not use ear plugs
 - Sterilizer Station, 1 Operator does not use ear plugs

In the document Hazard Aspect Identification, Risk Assessment and Control of Environmental OHS Impacts, it regulates PPE standards that harvest work, operators at Nut and Kernel stations and at sterilizer stations must use PPE.

The unit of certification has procedures related to PPE, including:

- WI entitled Work Instruction for Harvesting Fresh Fruit Bunches that the PPE harvesters specified are Helmets, Goggles, Gloves and Boots

- WI entitled Work Instruction for Harvesting Fresh Fruit Bunches that the PPE for employees to take the broken FFB, namely Gloves and Boots
- WI No. WI-SAG-PKS-PRS-0301 revision 1 was approved by the Production Head on September 1 2017 entitled WI Sterilization (Horizontal Sterilization) that PPE operators and assistant stew operators namely helmets, safety shoes, gloves, masks and ear plugs
- WI No. WI-SAG-PKS-PRS-0702 revision 1 was approved by the Production Head on September 1 2017 entitled WI Ripple Mill that PPE operators and assistant stew operators namely helmets, safety shoes, gloves, masks and ear plugs

The CH has sanitation facilities for pesticide workers in the form of wash houses. KUD Bina Sejahtera has a policy regarding the mechanism for storing PPE and work equipment which was ratified on October 23rd, 2022 by the Head of KUD Bina Sejahtera, including that workers are prohibited from washing, storing PPE and work equipment in their respective homes. After finishing work all workers handed over personal protective equipment. Before returning home, it is advisable to washing using the sanitation facilities provided by the KUD. KUD Bina Sejahtera shows the minutes of the handover of PPE on November 13, 2021 for sprayers in the form of 43 units of aprons, 43 units of chemist masks, 43 pairs of rubber gloves, 43 units of glasses, and 43 units of boots. However, based on the results of the visit to the rinse house there were only a few PPE sprayers, namely 10 units of aprons, 11 units of chemist masks, 9 pairs of rubber gloves, 5 units of goggles, 5 units of boots and 33 units of spray equipment. Based on interviews with KUD management representatives, it was discovered that some of the PPE and spray equipment were stored in each employee's house.

For the incident above, the unit of certification showed the minutes of corrective actions including socialization regarding the understanding of the importance of using PPE for occupational safety and health at Hikmah Dua Estate on November 25, 2022, which was attended by 3 harvesting employees. The company also showed proof of handing over PPE to 11 employees of Division I Hikmah Dua Estate and a statement that they would always use full PPE while working. In addition, there is an official report in the form of a statement from the sterilizer operator and the operator at the ripple mill station that the ear plug is missing and on November 22nd, 2022, the unit of certification has provided the operator with a new ear plug.

Based on the description above, it shows that the certification unit has the opportunity to ensure the provision/replacement of PPE for workers in accordance with established procedures and policies. **OFI**

6.7.4

The CH has provided health services for all workers including clinics at POM and at Hikmah Dua Estate. In addition, there are other health facilities such as cooperation in health services between KUD and the nearest Public health center, including cooperation in health services between KUD Sedia Mukti and Public health center Mesuji Raya regarding the provision of health services for KUD Sedia Mukti administrators and workers listed in the Cooperation agreement No. 71/KUD/SMK/D/V/2020 dated 18 May 2020, that the Public health center provides proper health and treatment services to KUD management and workers in accordance with the provisions and the KUD will pay claims for medical expenses for KUD management and employees.

The CH has registered *BPJS* Employment for all Selapan Jaya Mill and Hikmah Dua Estate employees as many as 632 people as of October 2022. Meanwhile in KUD Bina Tani Mulya, KUD Marga Mulya, KUD Sedia Mukti and KUD Bina Sejahtera the participation of *BPJS* for employment has not been all registered as shown in the following data

NO	UNIT	MONTH	EMPLOYEE	BPJS Employment	DIFFERENCE
1	SJ Mill & Hikmah Dua Estate	Aug 2022	609	695	86
		Sept 2022	621	700	79
		Oct 2022	632	663	31
2	KUD Bina Tani Mulya	Aug 2022	34	23	(11)
		Sept 2022	33	23	(10)
		Oct 2022	30	23	(7)
3	KUD Marga Mulya	Aug 2022	33	31	(2)
		Sept 2022	39	31	(8)
		Oct 2022	42	31	(11)
4	KUD Sedia Mukti	Aug 2022	27	16	(11)

		Sept 2022	42	13	(29)
		Oct 2022	39	13	(26)
5	KUD Bina Sejahtera	Aug 2022	33	8	(25)
		Sept 2022	33	8	(25)
		Oct 2022	33	8	(25)

Even though not all KUD employees are registered with the BPJS Employment, the guarantee for the safety of their employees has been covered by the KUD, for example there is a receipt for medical expenses given by KUD Bina Sejahtera management on May 30th, 2021 to their employees. In addition, the company has also recorded employee work accidents and followed up until the workers recover.

Based on the results of interviews with plantation and mill workers, it is known that the company has provided health insurance to workers and their dependents and employment guarantees to all workers.

Based on the above, it can be concluded that the Certification Unit has the opportunity to ensure the BPJS registration program for all workers (KUD). **OFI**

6.7.5

The CH shows the calculation table of Frequency Rate (FR) and Severity Rate (SR), including for Selapan Jaya POM and KUD Bina Sejahtera for the period January to September 2022 using LTA. In the LTA table there are data on the number of employees, the number of working days, the number of working hours per day, the number of working hours in 1 month, the number of working hours of employees, the number of overtime hours, the total working hours, the number of work accidents causing lost working days, the number of days lost work, frequency rate and severity rate.

In KUD Bina Sejahtera in the period January - September 2022 there were a total workforce of 196 people, 19,404 working days, 77,616 working hours, and there were 19,404 days without work accidents. The FR value of 0 means that employees are always at work because there have never been work accidents. In addition, there is an SR value of 0 meaning that during the period from January to September 2022 there is no loss of working time.

Meanwhile, at Selapan Jaya Mill there is a statistical report on work accidents for the period January-October 2022, there is a total workforce of 206 people, 51,308 working days, 359,156 working hours, 2 Work Accident Cases, 6,001 lost working days, and there are 13,692 lost days per case work accident. The FR value of 5.57 means 5.57 incidents per 1,000,000 hours of work. In addition, there is an SR value of 16,708.62 meaning that during the period from January to October 2022 there were 16,708.62 days lost for every 1,000,000 hours worked.

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

Status: Comply

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

7.1

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

7.1.1

The CH has several procedures for Pest and Plant Disease Control, including Procedure No. P-SAG-KBN-PML-16 concerning SOP for Leaf, Stem and Root Pest Management was approved by the Managing Director on March 2nd, 2015 and SOP for Pest Control for Plant Control No. SA-Plasma-PP-KS-02 was approved by the Managing Director on April 01st, 2017. The procedure was designed to control the growth of pests and diseases that have crossed the economic threshold, including UPDKS pests, Tirathaba, rats, oryctes, and Ganoderma.

The unit of certification has an Plant Pests control plan that is realized every month, for example in KUD Bina Tani Mulya there is a rat census which is carried out every month by looking at FFB attacks at collection point, including a rat census which was carried out on October 28 in groups of 5 plots 189 with a sample of 32 there were no rat attacks, in plot 190 with a sample of 24 there were no rat attacks, in plot 191 with a sample of 31 there were no rat attacks, and in plot 192

with a sample of 11 there were no rat attacks. KUD Bina Tani Mulya has not carried out rat control because rat pest attacks are still on the verge of below the economic limit, namely rat pest attacks <10%. KUD Bina Tani Mulya in October carried out a census of leaf pests of fire caterpillars and bagworms in groups 1 – 17 but there were no UPDKS attacks, so UPDKS pest control was not carried out because they were included in the mild attack category or 4 per frond.

The company also prevents pest attacks using biological methods, including the development of *Turnera Subulata* and *Antigonon leptopus*. Based on field observations, there are *Turnera Subulata* plants in KUD Bina Tani Mulya in groups 1-12 and in Hikmah Dua Estate in Block 15 Division 1.

Based on the description above, it shows that the company already has an IPM plan, implements the IPM plan and monitors it so that the implementation of pest control is effective

7.1.2

Based on document review, interviews with the Estate Manager, and field observations at Hikmah Dua Estate, KUD Bina Tani Mulya, KUD Marga Mulya, KUD Sedia Mukti and KUD Bina Sejahtera there are no invasive species used for plant pest control. The company controls pests and diseases using biological methods by developing Beneficial Plant *Turnera Subulata* and *Antigonon leptopus*, these species are not invasive in Indonesia.

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

7.1.3

As explained in indicator 7.1.1 in Hikmah Dua Estate, KUD Bina Tani Mulya, KUD Marga Mulya, KUD Sedia Mukti and KUD Bina Sejahtera do not use fire to control pests and plant diseases. The company carries out EWS by means of a census of pests and diseases according to the determined rotation and census points. The company prioritizes pest and plant disease control using biological methods, namely through the development of Beneficial Plants *Turnera Subulata* and *Antigonon leptopus*.

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

Status: Comply

7.2

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

7.2.1

The CH has procedures related to the use of pesticides, including those contained in the SOP for weed control No. SA-Plasma-PP-KS-06 was approved by the Managing Director on Oct 01st, 2015. The SOP regulates maintenance of manual yards, chemical yards, scratching discs, spraying discs or collection point and controlling weeds. In the use of pesticides, not all areas are sprayed with pesticides, but the areas that are sprayed are discs, path and collection point. To determine the need for spray volume per hectare, the company calibrates the spray equipment, nozzles, and road speed so that the dosage and volume of the spray solution is correct and not excessive. The company has determined the pesticides used for weed control, for example the active ingredient Glyphosate to control Imperata, broad and narrow leaf weeds, and the active ingredient Methyl Metsulfuron to control legume weeds, wild taro, ferns and young wood.

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

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

7.2.2

The CH has procedures for controlling weeds and plant pests selectively and prioritizing pest control using biological methods. Companies can show a list of pesticides used and the LD50 of the active ingredients, the area of pesticide application and the amount of pesticides used by the company. For example, in Hikmah Dua Estate, they use Garlon brand pesticides with the active ingredient Triclopyr butoxyl ethyl ester LD50 150 mg/Kg, a total application area of

2,235.85 Ha, a total use of 33.77 Lt of pesticides, pesticide use per hectare of 0.015103875 Lt/Ha, toxicity pesticide 0.000000003 Kg/LD50/FFB.

In addition, there is the use of pesticides in the Sedia Mukti Cooperative for the period January - October 2022 including Round Up 283 Lt, Garlon 47 Lt, Racumin 1,526 Kg and Strane 185 Lt, and Astertrin 196 Lt.

The use of pesticides in the Bina Sejahtera Cooperative for the period January - October 2022 includes Astertrin 517 Lt, Kepelstick 255 Lt, Round Up 149 Lt, Boom Up 47 Lt and Bayfolan 64 Lt.

The use of pesticides in the Marga Mulya Cooperative for the period January - October 2022 includes Round Up 273 Lt, Garlon 65 Lt and Astertrin 114 Lt.

While the use of pesticides in the Bina Tani Mulya Cooperative for the period January-October 2022 includes 416 Lt of Astertrin, 155 Lt of Kepelstick, 141 Lt of Round Up, 40 Lt of Boom Up and 55 Lt of Bayfolan

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

7.2.3

The CH shows several documents related to pesticides, including:

- Memorandum No. 124/DRD/XI/2019 which was approved by the R & D Director on November 15th, 2019 regarding the cessation of the use of paraquat and chemicals that are prohibited from using it based on RSPO provisions.
- Recapitulation of plans and realization of planting Beneficial Plants in 2022 covering an area of 1,863 Ha, as an alternative to suppressing leaf pests without using insecticides
- SOP for Plant Pest and Disease Control, that the control of plant pests and diseases is carried out based on census results with attacks above the threshold.

Based on the document review, there is data on pesticide use for 2021 and for the period from January to October 2022 as shown in the following table:

NO	PESTICIDE	INGREDIENTS	2021	Jan – Oct 2022
1	Decis 25 EC	<i>Deltametrin 25g/L</i>	890,30 lt	952,22 lt
2	Metsulindo	<i>Glyphosate</i>	517,88 Lt	832,54 Lt
3	Dithane M-45	<i>Mankozeb</i>	323,44 Kg	667,68 Kg
4	Life/Line	<i>Amonium Glifusonate</i>	351 Lt	604,20 Lt
5	Racumin	<i>Kumatetetrailil</i>	2,39 Kg	7,60 Kg

Based on the data above, it shows that the unit of certification has not been able to demonstrate that the use of pesticides has been minimized in accordance with the IPM plan. **NCR-2022.03**

7.2.4

The CH has an HPT control plan that is realized every month. In accordance with plant pest procedure No. SA-Plasma-PP-KS-02 was approved by the Managing Director on April 1, 2017, that HPT control must be in accordance with the results of the census. This census system includes the detection and counting of new attacks of pests and plant diseases which are carried out continuously throughout the plantation area, making it useful for monitoring the main pests of oil palm such as leaf pests (fire caterpillars and bagworms), rats, and diseases of oil palm plants. Pest control is carried out if the census results show moderate to severe attack categories. In addition, HPT control prioritizes biological methods including the development of Beneficial Plants of the *Turnera Subulata* and *Antigonon leptopus* types.

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

7.2.5

The CH has a policy regarding paraquat in document No. DRD/X/2019 November 15 2019 by the R & D Director regarding

the discontinuation of the use of paraquat and chemicals that are prohibited from using according to RSPO provisions. So, the operation of the oil palm plantation of PT. Sampoerna Agro, Tbk and its subsidiaries cannot use the active ingredient paraquat anymore and do not use pesticides for the purpose of preventing the spread of OPT. Based on the document review, they did not use pesticides with the active ingredient paraquat but used other pesticides with active ingredients that are environmentally friendly, including Glyphosate Isopropylamine, Methyl Metsulfuron and Triclopyr Butoxy Ethyl Ester. In addition, based on observations of the chemical warehouse at Hikmah Dua Estate, KUD Bina Sejahtera, KUD Marga Mulya, KUD Sedia Mukti and KUD Bina Tani Mulya, there is no stock of paraquat or other limited pesticides.

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

7.2.6

The unit of certification can show that pesticide applicators are carried out by employees who have attended pesticide training, including pesticide training at KUD Sedia Mukti on March 9th, 2022 at KUD Sedia Mukti's land related to socialization of estate maintenance which explains the application of fertilization and spraying and procedures for controlling pests and diseases in accordance with the SOP submitted by the KUD supervisor which was attended by 55 employees. Based on interviews with chemical warehouse officers at Hikmah Dua Estate, KUD Bina Sejahtera, KUD Marga Mulya, KUD Sedia Mukti, and KUD Bina Tani Mulya, it is known that officers understand MSDS, how to mix chemical materials, use emergency facilities, and use PPE for chemical warehouse staff.

This is in accordance with the results of interviews with 3 spray officers in Sedia Mukti Cooperative who know and understand related to spray work, use of PPE, storage in a special place and return home clean

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

7.2.7

Based on the results of field observations at the Hikmah Dua Pesticide Warehouse and Bina Sejahtera KUD it is known that the warehouse is made permanent, well ventilated, pesticides do not mix with other materials, there are facilities for mixing pesticides, there are emergency response facilities such as eyes washers and sufficient sand, warnings and symbol Toxic and Hazardous Materials and there is an MSDS.

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

7.2.8

The company has procedure of Integrated Management System (IMS) about Waste Management (P-SAG-KBN-LMB-01 revision 02 issued date October 30, 2015). The procedure consists of 4R system (Reduce, Reuse, Recycle and Recovery). The management and waste disposal plan has been including about used pesticide container and hazardous is disposal to third parties.

For example, the transportation of hazardous waste (Pesticide packaging) at KUD Bina Sejahtera which was carried out on 22 October 2022 by PT Ramos Alam Sejahtera with the type

- Used pesticide container 0.021 ton, manifest number KLHK-1657174846.
- Used Plastic Fertilizer Sacks 0.03 ton, manifest number KLHK-1657174640.

Based on interviews with employees and foremen of pesticide application in Hikmah Dua estate and Bina Tani Mulya Cooperative management and Sedia Mukti Cooperative management, is known that all containers used were returned and sent to temporary storage places for hazardous and toxic waste materials that were not used for purposes other than pesticide application activities. All used containers, work tools and work clothes are stored in a special storage area. Thus, there are no contaminated items to be taken home. The results of the employee's home Hikmah Dua estate observations show that it is not found that the used pesticide packaging is disposed of at the disposal site and is not used for other purposes such as trash cans, flower pots and so on.

7.2.9

The CH controls weeds and plant pests using manual and chemical methods. The CH grows LCC (Land Cover Crops)

plants with the types *Mucuna Brachteata*, *Puereria Javanica* and *Calopagonium Mucunoides*. In addition, the unit of certification develops beneficial plants in the form of *Turnera Subulata* and *Antigonon Leptopus* to help control caterpillar attacks and to develop the *Tyto Alba* species in controlling rat pests. Based on interviews with KUD Bina Sejahtera maintenance foremen and field observations, it is known that pesticides are sprayed using a knapsack sprayer and have never sprayed pesticides through the air.

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

7.2.10

The unit of certification has conducted annual special health checks including:

- On May 21st, 2022 at KUD Bina Sejahtera there was a health check for cholinesterase and spirometry for 25 spray employees with normal results.
- On May 17th, 2022 at KUD Marga Mulya there was a health check for cholinesterase and spirometry for 39 spray employees with normal results.
- On May 21st, 2022 at Selapan Jaya Mill there was a medical examination by the company doctor of 170 people with the results of 126 people being healthy and 44 people with hypertension. This hypertension disease is not a work-related disease but is caused by an unhealthy lifestyle so that workers are advised to maintain their health by eating regularly, vitamins and adequate rest and to field supervisors to provide OSH counseling to workers and good work methods and right.
- On May 28th, 2022 at KUD Bina Tani Mulya, there were periodic health checks for cholinesterase and spirometry for 16 spray employees with normal results.

In general, the health condition of employees at the factory and estate is quite good.

Based on the results of interviews with chemical warehouse officers it is known that health checks are carried out every 6 months, and the results of the last examination are in first semester of 2022 with good results.

In addition, based on the results of interviews with 3 spray workers at the Sedia Mukti Cooperative, it is known that they have undergone health checks and are currently in good health.

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

7.2.11

The CH has a memorandum regarding the prohibition of hiring pregnant or lactating women to spray and fertilize with document number 0044/MD/VIII/2010 issued by the Managing Director on August 31st, 2010. Hikmah Dua Estate conducts pregnancy checks for female spray workers once every 1 month and the result of pregnancy checks in the October 2022 period there were no female spray workers who were pregnant.

In addition, based on the results of interviews with spray supervisors at KUD Bina Sejahtera, it is known that if employees are still children, the unit of certification prohibits them from working in jobs that use pesticides and fertilizers. In addition, based on the document review, it is known that the youngest spray employee is 23 years old.

Based on the description above, it shows that there is no work related to pesticides carried out by employees under the age of 18, pregnant or breastfeeding women.

7.2.3	Status: Nonconformity No. 2021.03 with Major category
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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 registry for waste (included toxic and hazardous waste) products produced from mill and estates are identified and listed on 2022 identification and evaluation of pollution source document for example mill waste water are managed at waste water treatment plant before it distributed as land applications, hazardous waste were kept at temporary hazardous waste storage. The waste generated by smallholder consist of domestic waste for office and housing complex, hazardous waste i.e fertilizer sack and used pesticide container.

7.3.2

The company has identified the source of waste and pollution source and treat the identified source to reduce emission and pollution. The efforts taken by the company are:

- Domestic waste: based on field observation, the company has collected domestic waste periodically and dump it to the landfill and it's known that location of landfill is far away from waterways and the housing area.
- Empty fruit bunch is applied to estate plantation area to substitute chemical fertilizer. Based on field visit EFB application is well managed.
- Shell and fiber are reused for engine fuel of boiler. It reduces the carbon emission from the combustion of fossil fuel.
- POME disposal to surface water, before entering surface water POME managed on WWTP on 25 pond units, after reaching threshold comply with governor regulations Sumatera Selatan number 08 year 2012 disposal to surface water.
- The managing for clinical waste, the company also has cooperation with licensed parties such as PT Ramos Alam Sriwijaya and PT Dame Alam Sejahtera.

For Hazardous waste generated operational is transported by third parties licensed from government, accordance agreement letter, each KUD has a management agreement, mill and estate and still valid.

Based on the results of verification of the hazardous waste transport permit document i.e PT Ramos Alam Sriwijaya, the company already has a permit for the transport of hazardous waste and is still valid. For example:

- Letter of agreement for the management hazardous waste between KUD Bina Tani Mulya and PT Ramos Alam Sriwijaya for hazardous waste transported activities No.099/SPK/BTM-RAS-DAS/VII/2022 dated July 14, 2022, valid for 1 year.
- Letter of agreement for the management hazardous waste between Telaga Hikmah Dua and PT Ramos Alam Sriwijaya for hazardous waste transported activities No.031/MOU/TH-RAS-PLIB/III/2022 dated March 1 2022, valid for 1 year.

Document review shown that company has sent all toxic and hazardous waste to PT Ramos Alam Sriwijaya (licensed collector by decree of national environmental minister) such as last transported from Hikmah Dua estate dated 15 June 2022, previous transporting on 14 February 2022 (manifest are available and checked by auditors). Observation during audits at temporary hazardous & toxic waste storage shown that all of hazardous waste are compliant with the periods in permit (< 180 days).

Based on the results of field visits in the residential area of the Hikmah Dua estate and Selapan Jaya POM housing complex, information was obtained that domestic waste is managed by temporarily collecting it in residential waste bins and then transporting it to a landfill every 2 times a week. This is in accordance with Domestic Waste Management as regulated in procedure no. P-SAG-KBN-LMB-01 (Rev. 02) dated 30 October 2015 and procedure No. P-SAG-PPS-LMB-01 dated 30 October 2015.

7.3.3

Based on results of document review and field observation, found that company and KUD shown proper management ways for ex chemical containers, medical waste, and other hazardous/non-hazardous waste disposal based on their procedures and waste management plan. Based on results of field observation in housing complex of Hikmah Dua Estate, it is found that companies managed settlements/housing domestic waste by provide landfill on each division and sort the organic/an-organic waste. Besides, there is no open fire for waste disposal.

Status: Comply

7.4

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

7.4.1

The CH has a policy on soil fertility management, including:

- Plant fertilization procedures. P-SAG-KBN-PML-21 Rev 01 comes into force on March 16th, 2012 for Hikmah Dua Estate
- Fertilization procedure No. P-SAG-KBN-PML-21 Rev 01 comes into force on March 16th, 2012 for Hikmah Dua

Estate

The CH uses inorganic fertilizers, empty straw and Decanted Solid. In addition, the unit of certification conducts planting of Ground Cover Nuts (LCC) aimed at suppressing weed growth in order to save on weed control, increasing soil organic matter content and improving the physical condition of aerated soil and optimal soil moisture, preventing and reducing soil surface erosion, binding (fixation) free nitrogen from the air to enrich soil nitrogen, suppress the growth of certain pests and diseases.

In the period from January to October 2022 at Hikmah Dua Estate there were 1,638 Tons of Decanter Solid applications and 35,208 Tons of empty fruit applications. In addition, in the period from January to October 2022 there were applications of inorganic fertilizers including 5,713 Kg of urea fertilizer for an application of 102 Ha and 840,791 Kg of NPK-SGRO TM15 fertilizer for an area of 2,725 Ha

In addition, there are records of fertilization at KUD Sedia Mukti for the period April to June 2022, including:

- Fertilization on 4 April 4th, 2022 in group 2A covering an area of 32.5 Ha NPK 3500 Kg dose of 0.75 Kg/Pkk
- Fertilization on May 9th, 2022 in group 3 covering an area of 31.6 Ha NPK 3500 Kg dose of 0.75 Kg/Pkk
- Fertilization on June 8th, 2022 in groups 13 and 14 covering an area of 57.47 Ha NPK 6250 Kg dose of 0.75 Kg/Pkk

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

7.4.2

The unit of certification has records of leaf and soil analysis activities on a regular basis to monitor and manage changes in soil fertility and plant health, including:

- KUD Marga Mulya, KUD Bina Tani Mulya, KUD Bina Sejahtera dan KUD Sedia Mukti
 - Leaf analysis at KUD Marga Mulya, KUD Bina Tani Mulya, KUD Bina Sejahtera dan KUD Sedia Mukti was carried out by the Integrated Laboratory R & D Department of PT. Binasawit Makmur – Sampoerna Agro, Tbk, with the results of leaf analysis contained in document No. 015/MP.III-V/III/2021 dated 08 Apr 2021. Leaf analysis was carried out using 4 samples from plasma regions 3, 4 and 5. The leaf nutrient content measured was total N, P, K, Ca, Mg and B
 - Soil analysis at KUD Marga Mulya, KUD Bina Tani Mulya, KUD Bina Sejahtera dan KUD Sedia Mukti was carried out by the Integrated Laboratory R & D Department of PT. Binasawit Makmur – Sampoerna Agro, Tbk, with the results of the soil analysis contained in document No. 056/SL/2019 dated 16 Aug 2019. Soil analysis was carried out using 74 samples from plasma areas 3, 4 and 5. The soil nutrient content measured was total N, TOC, CEC, K, Na, Ca, Mg, P2O5 in 25% HCL, P2O5-Bray II, pH-H2O, Texture, Boron, and Fe in DTPA
- Telaga Hikmah II Estate
 - Soil analysis at Telaga Hikmah II Estate was carried out by the Integrated Laboratory R & D Department of PT. Binasawit Makmur – Sampoerna Agro, Tbk, on November 1st, 2021. Soil analysis was carried out using 28 samples. The soil nutrient content measured was total N, TOC, CEC, K, Na, Ca, Mg, P2O5 in 25% HCL, P2O5-Bray II, pH-H2O, Texture, Boron, and Fe in DTPA
 - Leaf analysis at Telaga Hikmah II Estate was carried out by the Integrated Laboratory R & D Department of PT. Binasawit Makmur – Sampoerna Agro, Tbk, with the results of leaf analysis contained in document No. 050/FL/2021 on 12 May 2021. Leaf analysis was carried out using 56 samples. The nutrient content of the leaves was measured, namely total N, PK Ca Mg B

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

7.4.3

The unit of certification has utilized empty fruit bunches and solid decanters as an alternative method for managing soil fertility, for example the unit of certification has records of the realization of organic fertilization for the period January – October 2022, there were 39,197.16 applications of empty fruit bunches to Hikmah Dua Estate and 6,664.22 tons to Plasma. As for the utilization of Decanter Solid to Hikmah Dua Estate as much as 1,593.49 tons and to Plasma as much

as 2,333.6 tons. The application of non-organic fertilizers has been utilized optimally according to R & D recommendations on the basis of leaf and soil analysis.

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

7.4.4

The company has an organic and inorganic fertilization program policy in accordance with leaf and soil analysis as described in indicator 7.4.2. The company has records of the realization of organic fertilization for the period January – October 2022, namely there were 39,197.16 EFB applications to Hikmah Dua Estate and 6,664.22 tonnes to Plasma. As for the utilization of Decanter Solid to Hikmah Dua Estate as much as 1,593.49 tons and to Plasma as much as 2,333.6 tons. In addition, there is the application of inorganic fertilizers in all certification units for the period January – October 2022, for example there is the application of urea fertilizer in the Hikmah Dua Estate of 5,713 Kg for the application of fertilizer covering an area of 102 Ha, and the application of NPK-SGRO TM15 fertilizer of 840,791 Kg for an area of 2,725 Ha

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

	Status: Comply	
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7.5

Practices minimise and control erosion and degradation of soils.

7.5.1

The unit of certification can show the 2016 semi-detailed study document accompanied by a land suitability map, slope map and soil type map with a scale of 1:50,000. As for the slopes, it is known that more than 97% of the certified area is flat (slope <8%) and the rest is undulating (slope between 9-15%). In addition, based on semi-detailed soil maps, the unit of certification consists of 3 types of soil, namely Lithio Hapludults, Typic Endoaquepts, Aquic Dystrudepts, Typic Hapludults, Plintic Hapludults, Lithic Hapludults and there are no peat soil types.

From the data presented, it is known that there are no marginal or fragile soil areas within the scope of certification.

7.5.2

Realization of replanting in 2021 has been carried out at KUD Bina Sejahtera covering an area of 1,128.17 Ha and at KUD Sedia Mukti covering an area of 1,020.36 Ha. The unit of certification can show a 2016 semi-detailed study document accompanied by a land suitability map, a slope map and a soil type map with a scale of 1:50,000. For slopes, it is known that more than 97% of the certified area is flat (slope <8%) and the rest is undulating (slope between 9-15%). Based on the results of field observations in the replanting area at KUD Bina Sejahtera Group 57 Plot 1,339 it is known that the area is included in the flat category and is in accordance with the slope map.

Based on the description above, it shows that the unit of certification does not carry out extensive replanting of oil palm on steep slopes according to applicable regulations

7.5.3

Based on the document review, it is known that currently the unit of certification has not carried out new plantings. New plantings were carried out from 1992 to 2012 and in 2021 the certification unit has carried out replanting at KUD Bina Sejahtera covering an area of 1,128.17 Ha and at KUD Sedia Mukti covering an area of 1,020.36 Ha. In addition, based on the 2016 semi-detailed study document accompanied by land suitability maps, slope maps and soil type maps with a scale of 1: 50,000 it is known that the slope of the operational area is 97% in flat conditions (slope <8%) and the rest is in undulating conditions (slope). between 9-15%).

Based on the description above, it shows that no new planting of oil palm has been carried out on steep slopes in accordance with applicable regulations.

	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 unit of certification can show the 2016 semi-detailed study document accompanied by a land suitability map, slope map and soil type map with a scale of 1:50,000. As for the slope, it is known that more than 97% of the certified area is in flat condition (slope <8%) and the rest is in undulating condition (slope between 9-15%). In addition, based on semi-detailed soil maps, the unit of certification consists of 3 types of soil, namely Lithio Hapludults, Typic Endoaquepts, Aquic Dystrudepts, Typic Hapludults, Plintic Hapludults, Lithic Hapludults and there are no peat or other marginal soil types. In addition, the certification unit does not have a new plantation development location in its operational development activities.

7.6.2

In accordance with indicator 7.6.1 it is known that based on the semi-detailed soil map the unit of certification consists of 3 types of soil namely Lithio Hapludults, Typic Endoaquepts, Aquic Dystrudepts, Typic Hapludults, Plintic Hapludults, Lithic Hapludults and there are no peat soils, fragile soils or marginal soils other. In addition, the certification unit does not have a new plantation development location in its operational development activities.

Based on the description above, it shows that there is no extensive planting on marginal soils and land management with best cultivation practices.

7.6.3

In accordance with indicator 7.5.1, the CH has for area slopes of more than 97% of the area in flat conditions (slope <8%) and the rest in undulating conditions (slopes between 9-15%). Based on the results of field observations there are no sloping areas so there is no need for felting, while drainage and roads have followed the block design and land contours as in the replanting area of KUD Bina Sejahtera. In addition, the certification unit does not have a new plantation development location in its operational development activities

Based on the description above, it shows that the company uses soil and topographic survey reports in planning drainage systems, roads and other infrastructure

	Status: Comply	
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7.7

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

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

The CH shows an overlay map of 1:250,000 scale peat restoration made by the Planning, GIS and Survey Department on 28 August 2018. The map contains operational areas, peat dome restoration priorities with canals (protected zones), peat dome restoration priorities without canals (protected zones) and priority areas for canal peat restoration (protected zones). The operational area of the certification unit is not in the peat restoration area.

Based on the PIPIB map (Indicative Map for Postponement of New Permits) Revision XIV scale 1: 250,000 made by the Ministry of Environment and Forestry in 2018 that the unit of certification is not included in the location of the suspension of natural forest, conservation forest and peat land

In addition, based on semi-detailed soil maps, the unit of certification consists of 3 types of soil, namely Lithio Hapludults, Typic Endoaquepts, Aquic Dystrudepts, Typic Hapludults, Plintic Hapludults, Lithic Hapludults and there are no peat soil types.

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

	Status: Comply	
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7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The company unit already has a 2022 water management plan document and the implementation of water management or water protection sources. In addition, the water management plan has been included in the company's environmental impact assessment and HCV assessment documents.

Several plans have been implemented, including water use efficiency, surface water quality monitoring, well water quality monitoring, POME quality monitoring and woody plant enrichment in riparian areas.

The company also conducted regularly water quality testing every semester based on RKL/RPL matrix. Document review shown that semester 1 year 2022 testing result for Dabuk hitam river, Jembatan Karet Belida river, Deras river, Jembatan Poros Belida river and Deras river (PT Aek Tarum) for scope Selapan Jaya Pom and supply base (PT SA) surface water testing on Air Rawa Gading river, Rasau river, Dabuk Hitam river and IPOH river are not compliant with standard quality (government regulation Number. 22 of 2021) such for parameters pH and DO.

In this regard, the company has carried out an evaluation described in the RKL-RPL report for semester 1 of 2022, based on the company's analysis, regarding the incompatibility of surface water quality standards because there are activities outside the company's operational area such as domestic activities in the upper reaches of the river. The company has also carried out management of water sources such as prohibiting the application of pesticides and fertilizers on riparian and reservoirs, while for leaving the operational area the company has carried out socialization regarding river water quality and plans for managing water sources to the community which was carried out on April 18, 2022, in Kerta Mukti village and Sukasari village.

The company has been monitoring of ground water quality on 3 monitoring well sample point date 21 March 2022 has been carried out by management with results still in accordance with applicable regulations (Permenkes No.32 year 2017), in addition to ensuring the absence of pollution and avoiding the occurrence of pollution.

7.8.2

The company and scheme smallholders have procedures related to the identification of sources and water quality (P-SAG-ADM-KTU-08 and SA-PLASMA-PP-KS-12). These procedures concerning to protect and manage the riparian zone. The company has identified rivers and wetlands inside plantation area. Analysis of HCV containing distribution maps of the river in the area of PT SA, PT TH and the cooperative of PT SA. Based on the identification documents of High Conservation Value (HCV) that rivers flow in the operational area of Selapan Jaya mill and supply base is Ketek river, Dabok river and Tungong river.

All identified buffer zone has been designated as HCV and protected areas. Field observations on Hikmah Dua estate showed evidence of surface water protection measures and including riparian such as:

- Determination of river buffer zone with a distance of 50 meters left-right of small river demarcation of the border is done with the installation of boundary markers.
- No chemicals application (fertilizers and herbicides) in the buffer zone area.
- Signboard of river buffer zone protection. Prohibiting the use of chemicals in the river buffer zone.
- Planting riparian with Guatemala, bamboo and trembesi to prevent landslide and erosion.

7.8.3

The company already the permit of POME Disposal of PT Sampoerna Agro (Selapan Jaya POM) based on the head of the Environment service of Ogan Komering Ilir number: 660/KEP/SKET/DLH-PPKL/2022 dated June 20, 2022, which is valid if not change operation. Wastewater is discharged into the Dabok Hitam river, with the highest discharge of 2.5 m3 per ton of CPO Palm Oil Product.

The company has routinely tested the quality of POME every 1 month in an accredited laboratory (LP-231-IDN). Based on the results of testing during January 2021 - October 2022, it is known that all parameters including BOD are still in accordance with the Minister of Environment Regulation No. 5 of 2014 and local regulation governor Sumatera Selatan regulations number 08 year 2012.

7.8.4

The company has surface water extraction permit issued by Sumatera Selatan Province from One Stop Investment and

Services Office No. PB-UMKU:912030973055500080001 dated 27 September 2022 valid if not change operation.

The standards of water usage for FFB process has defined on 2021 budget projected 1.40 m³/mt FFB processed. Water usage monitoring was done recorded and summarized every month. The company recorded its actual water use. The average water use per ton FFB for period of January – December 2021 is 1.33 m³/ton FFB, while budget for water consumption for period 2021 is 1.40 m³/ton FFB.

Based on result of filed observation in Selapan Jaya POM water treatment plant, it is found that monitoring for raw and process water usage was done by officer periodically, and flowmeters at inlet/outlet serves normally. Procedure for Mill water usage and monitoring are provided and has been listed on procedures No P-SAG-ADM-KTU-08.

Status: Comply

7.9

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

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

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

The company already maximizing the use of renewable energy (fiber & shell) as boiler fuel. For example, use of shells and fiber period January to December 2021 Selapan Jaya POM has produces 1,128,973 kWh of electricity from turbine. Renewable energy use per ton of palm product in the mill is 15,71 kwh / ton CPO. Result Direct fossil fuel used is 0,10 kWh/ 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 minimize GHG emissions.

7.10.1

The company has identified source of pollution and air emission sources, including gaseous, particles and shoot emissions and effluent covering emissions and pollution sources from estate and mill operations. The emission source identified from estate and mill operation among others are land use change, vehicle operation, machine operation, fertilizer and pesticide application, use of AC/refrigerator, waste piling and electricity consumption.

Identification of significant GHG gas emission source is identified, and the mitigation plan has been developed by the company covering mill and estate. The significant GHG emission among others are land use change, POME, use of fertilizer and pesticide, use of fossil fuel for operation and transport. The mitigation plan among others is correct dosage use for fertilizer and application as recommended, reduce reuse and recycle action, electric use limitation, transport and engine maintenance, periodic air quality test.

Fossil fuel reducing on Selapan Jaya POM have been implemented by fiber/shell usage for boiler. POME has been monitored every month and monitoring periods January 2021 to October 2022 shown that all of waste water testing parameters is compliant to the standards quality.

Based on document review for examples: pesticides usages monitoring, diesel fuel monitoring, HCV identification and etc found that accurate data has been put into the RSPO palm GHG Calculator. Summary of net GHG emissions from PalmGHG calculator of the audit report which calculation option is applied "Apply full Version".

The calculation of GHG and its monitoring has conducted by EHS department. GHG emission calculated using RSPO palm GHG calculator 4.0 Summary of GHG emission for Selapan Jaya POM and its supply base are listed as follows:

Emissions per product	tCO ₂ e/tProduct
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CPO	-0.57
PK	-0.57

Production	t/yr
FFB processed	217,825.00
CPO produced	46423
PK produced	11188

Extraction	%
OER	23.31
KER	5.14

Land use	Ha
Planted area on mineral	28474.88
Planted on peat	4779.36
Total area planted	33254.24
Conservation Area (Forested)	1021.09
Conservation Area (Non-Forested)	00
FFB Production per hectare	14.29

Summary of field emission and Sinks

Description	Own crop		Group		3rd	Total
Emissions Sources	tCO2e	tCO2e/ tFFB	tCO2e	tCO2e/ tFFB	tCO2e	
Land conversion	6066.48	0.04	761.84	0.23	0	6828.32
CO2 emissions from fertilizer	6979.59	0.04	197.12	0.06	0	7176.71
NO2 emissions from peat	0	0	230.70	0.07	0	230.70
NO2 from Fertilizer	3011.47	0.02	81.74	0.02	0	3093.21
Fuel consumption	519.01	0	27.06	0.01	0	546.07
Peat oxidation	0	0	1682.68	0.51	0	1682.68
Sinks						
Crop sequestration	-18059.05	-0.11	-837.23	-0.25	0	-18896.27
Sequestration in	-765.55	0	-2.12	-0.00	0	-767.67
Conservation area						
Total	-2248.04	-0.01	2141.80	0.65	5603.05	5496.81

Summary Oil Mill Emissions and Credits

Remarks	tCO2e	tCO2e/t FFB
Emissions sources		
POME	0	0
Fuel consumption	181.75	0
Grid electricity	0	0
Credits		
Export of grid electricity	0	0
Sales of POM	-38671.11	-0.18
Sales of EFB	0	0
Total	-38489.36	-0.18

Palm Oil Mill Effluent (POME) Treatment

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

POME Divert to Anaerobic Digestion

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

Based on the results of the verification of the data calculated above, it is known that there is a difference in the area of the HCV area in the calculation 1021.09 Ha (all supply to Selapan Jaya POM), while for scope certification just Hikmah Dua estate 53.82 Ha and smallholder 16.32 Ha consist of KUD Jaya Makmur, KUD Maju Lancar, KUD Marga Mulya, KUD Sedia Mukti, KUD Serba Usaha and KUD Sumber Sentosa and total Conservation Area (Forested) on RSPO scope certification is 70.14 Ha. Whereas peat 4779.36 Ha area outside the scope of Selapan Jaya POM RSPO certification namely Hikmah Empat Estate, Hikmah Satu Estate, Jaya Permai Estate, Limau Kesturi Estate, Mega Terang Estate and Tanjung Sari Estate.

The program mitigation to reduce the GHG was in place for 2021 and 2022, with the programme about reducing GHG emission from year to year. From GHG calculation year 2021, the emission from FFB production was 0.03 tCo2/ton FFB equal with 11.41 tCO2/ton and for 2022 was -0.18 tCo2/ton FFB equal with -0.57 tCO2/ton CPO. Interviewed with management, the Reducing of the emission caused by the decrease fuel consumption at the mill, methane capture process and increase volume sale of shell at POM.

7.10.2

Based on planting year data, it is known the company planted from 1994 to 2012. Until recertification audit, there is no new planting activities above 15 November 2018.

7.10.3

For existing operation, the company has identified pollutions and emissions sources of Selapan Jaya POM for period 2022, such as CO₂ (boiler, generator, transportation), CH₄ (POME), hazardous waste (WTP, chemical storage), noise (machinery). The sources of pollution and emissions for estate are listed on the identification documents and management plans for pollution sources for the period 2022, such as: emissions (CO₂, CO), noise, chemical waste, organic and inorganic waste and infectious waste. Plans to reduce or minimize has been implemented and monitored as explained on RKL-RPL semester 1-year 2022.

Fossil fuel reducing on Selapan Jaya POM have been implemented by fiber/shell usage for boiler. POME has been monitored every month and monitoring periods January 2021 until October 2022, shown that all of POME testing parameters is compliant to the standards quality.

Status: Comply

7.11

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

7.11.1; 7.11.2

The company have a zero burning policy that explicit stated in Group Company Policy signed by Chief Executive Officer on July 20th, 2015. The statement is: To prevent environment pollution and land clearing without fires (zero burning). A procedure for zero burning on Land Clearing, SOP No P-SAG-KBN-PML-03, is available. This procedure is referring to national law regarding controlling on damage and Environment Pollution caused by land fire and forest fire. The SOP mentioned that land clearing must be carried out with controlling and zero burning, and also prohibition of HCV areas disturbance. Land clearing method used is the uprooting and stacking of the wood to rotten.

KUD already has a no-burning policy contained in the Joint Policy and Commitment that has been signed by KUD management/administrators. For example, for KUD Bina Sejahtera it was signed on January 10, 2022. The joint policies and commitments of KUD are explained as follows:

- Respect human rights, including the right of all workers to associate and bargain collectively. Do not discriminate against race, ethnicity, national origin, religion, physical disability, gender, sexual orientation, trade union membership, political affiliation or age. No forced labor and illegal workers. Respect human rights defenders
- Preventing sexual harassment and violence for all workers and protecting reproductive rights, especially for women

workers. Do not employ children under the age of 18.

- **Prevent environmental pollution and carry out land clearing without burning** and not clearing new land in protected areas, HCV areas, peatlands, forests with high carbon stocks and protect flora and fauna that are endangered.

Based on the results of observations of the replanting area, it is known that replanting activities are carried out with a mechanical system and there is no indication of burning.

The company already has fire prevention and control measures, for example:

- Carry out monitoring of fire facilities and infrastructure on a regular basis. The simulation results of fire emergency response equipment show that the fire equipment is in good condition and ready to use.
- Has an emergency response team structure that has been trained to handle fires
- Conduct training simulations on a regular basis. For example, a fire emergency response simulation at KUD Bina Tani Mulya on April 13, 2021
- Reporting on the preparedness of fire control facilities and infrastructure systems on a regular basis. For example, the report for semester 2 of 2021 was submitted to the Plantations Service on May 20, 2022.

7.11.3

The company has involved stakeholders on locations border operational areas as an effort to prevent and control fires through socialization and simulation of land fires on November 5, 2019, by involving all representative management cooperative and public figure. Reports of events and photos of implementation have also been shown.

The results of interviews with representatives of surrounding villages (such as Maribaya and Embacang Permai village) and Koperasi Mandiri (as FFB transporter) obtained information that the company has involved local stakeholders in terms of preventing land fires. Based on the results of field observations in the operational activities, it shows that there is no operational activities that use fire. Based on interviews with management and field observations at replanting area, it was known that all land clearing activities are carried out with a mechanical system.

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

New planting after November 2005 have been reported by the company to the RSPO, as for planting above 2010 without going through the NPP stage, the company has received a 3-year sanction for not being able to claim certified products for planting areas above 2010. The current ban of 3 years has already passed. As for the previous audit to recertification, there have been no changes and no new developments. Based on RSPO email (rspocompensation@rspo.org) on October 25, 2017, the PT Telaga Hikmah have passed LUCA review with information Total final conservation liability 0 Ha and Total area requiring remediation 0 Ha. In addition, there are no new planting activities for planting after 15 November 2018.

7.12.2

PT Telaga Hikmah (Hikmah Dua Estate)

The company (Hikmah Dua Estate) has conducted HCV assessment on September 23-28, 2012, by Forest Faculty, Bogor Agriculture University. HCV conducted by qualified assessors namely Dr Nyoto Santosa and Ir Ahmad Faisal Siregar. HCV identification found HCV 4.1 (swamp area) about 53.82 Ha. In the HCV study process the company and consultant conducted public consultation with relevant stakeholder on September 28, 2012, attended by 60 persons from related community and internal workers.

PT Aek Tarum (KUD Jadi Mandiri)

Specifically, for the KUD Jadi Mandiri area which is included in the PT Aek Tarum area, the HCV assessment was in 2014. Peer review was carried out by Kresno Dwi Santosa in May 2014. Based on the results of the PT Aek Tarum HCV Assessment, an HCV area of 367.72 Ha was found which spread over an area of 91.88 hectares of Belida Estate in the

form of riparian Dabuk Hitam and Mesuji estate covering an area of 275.84 hectares in the form of riparian Deras and riparian Mesuji. As for the KUD Jadi Mandiri area, no HCV area was identified.

Location	HCV Area (Ha)
KUD Jadi Mandiri	0

Plasma Sampoerna Agro (11 KUD)

The company also has conducted HCV assessment for its supplier (17 smallholders) in 2017 by PT Sonokeling. HCV Conducted by qualified assessor namely Ir Siswoyo. The HCV assessment cover area of 20,217.27 ha. HCV identification found HCV is overlapping between HCV 1.1 and HCV 4.1 about 137.75 Ha. The HCV area for 10 KUDs included in the certification scope was 36.17 Ha. In the HCV study process the company and consultant conducted public consultation with relevant stakeholder on February 17, 2017, attended by 57 persons from related community. HCV area which has been established is 132,13 Ha as shown below:

Location	HCV Area (Ha)
KUD Jaya Makmur	1,10
KUD Karya Makmur	16,43
KUD Sumber Rezeki	11,18
KUD Madya Karya Bhakti	0
KUD Maju Lancar	8,85
KUD Marga Mulya	1,41
KUD Mekar Sari	14,93
KUD Mulya Jaya	31,48
KUD Permata Bunda	4,43
KUD Rahayu Bhakti	11,42
KUD Sedia Mukti	13,39
KUD Serba Usaha	4,05
KUD Subur Makmur	12,55
KUD Sumber Sentosa	0,91
KUD Bina Sejahtera	0
KUD Intan	0
KUD Bina Tani Mulya	0
Total	137,75

HCV Area in 11 Plasma as include Recertification Scope is 29,71 Ha, as shown below:

Location	HCV Area (Ha)
KUD Jaya Makmur	1,10
KUD Madya Karya Bhakti	0
KUD Maju Lancar	8,85
KUD Marga Mulya	1,41
KUD Sedia Mukti	13,39
KUD Serba Usaha	4,05
KUD Sumber Sentosa	0,91
KUD Bina Sejahtera	0
KUD Intan	0
KUD Bina Tani Mulya	0
Total	29,71

The HCV assessment was conducted for 9 months from January – September 2017, while the field survey was conducted on 13-19 February 2019. The HCV assessment has gone through a review process at the HCVRN in the following order:

- First Submission 27 February 2018.
- First response from HCVRN on 12 December 2018 with Unsatisfactory status.
- First Resubmission on March 19, 2019.
- Response from HCVRN on 27 March 2019 with Satisfactory.

In surveillance activities 1.1 carried out for the scope of KUD Sedia Mukti declare all members on HCV areas out of RSPO certification, so no HCV area on KUD Sedia Mukti. The lot numbers that come out of membership consist of numbers 99, 100, 101, 102, 12, 18, 19, 61, 62, 63, 64, 65, 66, 67, 168, 169, 170, 201, 202, 203, 424, 430, 446, 448, 459, 460, 471, 472, 483, 484, 485, 509, 510, 519, 520, 533, 534, 541, 542 and 558. The company also shows the updated KUD Sedia Mukti operational area map (lay out 25 November 2022) document which explains that there are no HCV areas included in the scope of RSPO certification. So that the total HCV area for the scope of KUD is 16.32 Ha and the scope of Hikmah Dua estate is 53.82 Ha.

7.12.3

Base on document submitted by Proforest namely RSPO No deforestation consultancy: high forest cover countries, Consultancy report on definitions and recommendations to the RSPO June 2018 as known not set HFCL for Indonesia.

7.12.4

The company established HCV management plan to maintain the HCV areas in operation area of PT Sampoerna Agro, Hikmah Dua Estate and scheme smallholders, listed on Management plan HCV 2020-2024 documents. HCV management activities that taken by the management unit are maintain HCV attributes (HCV boundary, sign board), HCV socialization (community and worker), maintain HCV area, fire control, regular patrols for maintain HCV security, RTE species monitoring, enrichment in riparian. This HCV plan has been reviewed and developed by involving relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (e.g. representative of Suka Sari village, Kerta Mukti village, Gedong Rejo village, Sedyo Mulyo village, Bumi Makmur village, KUDs, etc.) which was held on 21 June 2022.

Based on field visits on HCV swamp Area, Block 33 C Hikmah Dua Estate found that companies have marked buffer zone, still natural vegetation and HCV signboard placement. During field visit also found riparian of swamp condition were managed well and there are no chemical activity indications on that riparian that become sampling audit. Results of the verification documents, field visits and interviews with villagers obtained information that there are no areas of HCV-related and affect the local community.

7.12.5

Based on verification documents, field visits and interviews with villagers obtained information that there are no areas of HCV-related and affect the local community.

7.12.6

HCV assessment covers presence of protected area that significantly affected by plantation and mill, conservation status and identification of HCV habitats. Based on HCV assessment identification, there is not any species (flora and fauna) categorized as RTE species. The HCV assessment was conducted using Common Guidance for Identification of HCV, HCV assessment manual (HCVRN 2013) and Guidance of identification of HCV in Indonesia (HCV Toolkit Indonesia, 2008). The company has HCV map.

The company has rules to protect RTE species that stated on procedure of *Konservasi Satwa dan Tumbuhan Dilindungi* (SOP-AGR-052-R03 dated 1 August 2017). Besides, scheme smallholder has also procedure of *Pengelolaan dan Pemantauan KBKT* on KUD (SA-PLASMA-PP-KS-12 dated 1 April 2017) regarding rules to protect RTE species. The company and smallholder have management and monitoring program to educate the worker and local company about the status RTE species by periodic socialization of HCV value. There is a memorandum no 058/MD/V/2016 date May 16, 2016, signed by Managing Director Sumatera that mention the disciplinary sanction if any worker and local community found to have captured, harmed, collected or killed RTE species in accordance with government regulation.

The company have established HCV management plan and implemented it well. Regularly patrols record RTE species and monitored illegal hunting, and other illegal activities. The company has been monitored RTE every month and recapitulation every quarter. Based on monitoring period January to October 2022 for Hikmah Dua Estate and all cooperatives have been in accordance with HCV management program. All of records for daily patrols on year 2022 for estate and KUD are available and verified by auditors and concluded RTE species on operation area consist of cekakak belukar (*halcyon smyrnensis*) and kipasan belang (*rhypidura javanica*).

7.12.7

The company has carried out activities related to HCV management & monitoring implementation and the protection of flora and fauna period 2021 which has covered scheme smallholders. For example, the results of flora and fauna monitoring and HCV area in 2022, patrols, land measurements and community claims. As the results of 2021 HCV management and monitoring output, company has plan feed back into (review) the management plan 2022 i.e conduct water quality testing for, Dabok Hitam River, Ketek River, IPOH river and Tungong River every year for maintain surface water quality.

Based on document verification and interview with management, company has also conducted monitoring HCV area boundary markers quarterly. For examples, company has shown result of last monitoring HCV boundary areas in 2021 as shown below:

- Minutes of HCV boundary mark monitoring at KUD Marga Mulya, KUD Serba Usaha, KUD Sumber Sentosa, KUD Maju Lancar, and KUD Jaya Makmur dated 22 March 2022, attached documentation the activities photo.
- Minutes of HCV boundary mark monitoring at KUD Marga Mulya, KUD Serba Usaha, KUD Sumber Sentosa, KUD Maju Lancar and KUD Jaya Makmur dated 12 July 2022, attached documentation the activities photo.

Those monitoring results show that HCV mark boundaries is still in good condition. In addition, based on document verification, company has established HCV management plan to maintain the HCV areas in operation area of PT Sampoerna Agro, Hikmah Dua Estate and scheme smallholders, listed on Management plan HCV 2020-2024 documents. This HCV plan has been reviewed and developed from results of 2021 HCV management and monitoring output by involving relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (e.g., representative of Suka Sari village, Kerta Mukti village, Gedong Rejo village, Sedyo Mulyo village, Bumi Makmur village, KUDs, etc.) which was held on 21 June 2022).

7.12.8

The opening after November 2005 has been reported by the company to the RSPO, while for planting above 2010 without going through the NPP stage the company has received sanctions for 3 years unable to claim certified products for planting areas above 2010. As for now the sanctions are for 3 years already passed. As for the previous audit, up to now there has been no change and no new developments.

	Status: Comply	
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3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or √
ASA-1.1	CH does not use RSPO trademark both on and off products	✓
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or √
ASA-1.1	CH does not use RSPO trademark both on and off products	✓
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or √
ASA-1.1	CH does not use RSPO trademark both on and off products	✓
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or √
ASA-1.1	CH does not use RSPO trademark both on and off products	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

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

PT Sampoerna Agro Tbk Time Bound Plan (TBP) is explained in table 1.10. PT Sampoerna Agro Tbk run ten (10) mills and ninety (90) estates (own and smallholders) in Indonesia and has achieved RSPO certified for six (6) mills and supply base in Indonesia. PT Sampoerna Agro Tbk has informed the TBP progress, MUTU has considered that PT Sampoerna Agro Tbk is comply with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by PT Sampoerna Agro Tbk on 28 June 2021 approved by Chief Executive Officer.

MUTU has verified partial certification for un-certified unit's subsidiary of PT Sampoerna Agro Tbk based on their Time Bound Plan. There are two (2) mills and forty-seven (47) uncertified management unit of PT Sampoerna Agro Tbk. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There is no significant land conflicts which have not been declared above
- The company has follow RSPO requirement related to 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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company Group/Holding Statement: Companies are already doing internal audits. There are internal audit reports for each company.</p> <p>Auditor Verification: Internal Audit report available for uncertified management unit:</p> <ul style="list-style-type: none"> - PT Sungai Rangit (Sungai Rangit Mill and supply base), January 2022 - PT Lanang Agro Bersatu (Lanang Agro Bersatu Mill and supply base), February 2022 - PT Tebar Tandan Tenerah, February 2022 - PT Nusantara Sarana Alam, February 2022 - PT Kedurang Prakarsa Nabati, February 2022 - PT Pratiwi Agro Sejahtera, February 2022 - PT Kusuma Mentari Makmur, February 2022 - PT Agro Panindo Utama, February 2022. - PT Usaha Agro Indonesia, February 2022. - PT Usaha Agro Indonesia, Sempurna Bersatu Cooperative, February 2022

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
i.	<p>No replacement after dates defined in NIs Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p><i>Company Group/Holding Statement:</i> The uncertified management units has carried out some ef-forts to comply requirement as follows: HCV assessment :</p> <ul style="list-style-type: none"> • Hikmah Lima estate (additional for land use right year 2019) – PT Telaga Hikmah has carried out HCV assessment on 24 to 29 September 2012. • KUD Makmur Bersama (scheme of smallholder under Sumber Sawit estate) has carried out HCV assessment on 24 to 27 January 2017 • Limau Kesturi Estate – PT Sawit Selatan has carried out HCV Assessment on July to August 2011 and re-assessment on Oct to November 2016. • Limau Kasturi Estate Smallholder has carried out HCV assessment on July 2011. • Jaya Permai Estate, Nawa Surya Estate & Puncak Terang Estate – PT Selatan Jaya Permai has carried out HCV assessment on 18 to 28 May 2010 and re-assessment on 04 to 12 August 2015. • Nawa Surya Estate Smallholder has carried out HCV assessment on May 2010. • Gading Jaya Estate & Sepucuk Estate – PT Sampoerna Agro Tbk has carried out HCV assessment on 17 to 19 December 2013 (Gading Jaya Estate) and on 18 to 19 May 2010 (Sepucuk Estate). • Megaterang Estate & Tanjung Sari Estate – PT Mutiara Bunda Jaya has carried out HCV assessment on 11 to 18 September 2012. • KUD Tanjung Mesayu, KUD Sumber Makmur, KUD Sari Makmur and KUD Permata Indah (Mega Terang Small-holder) – scheme of smallholder under PT Mutiara Bunda Jaya has carried out HCV assessment on 6-11 February 2017. • Baboti Estate, Rauk Naga Estate Waringin Estate, Sukamara Estate, Telaga Bintang Estate and Sungai Sagu Estate – PT Sungai Rangit has carried out HCV assessment on 12 to 16 February 2013. • UAI smallholder has carried out HCV assessment on May 2010. • Gaharu Palm Estate – PT Anugrah Palm Indonesia has carried out HCV assessment on 01 to 10 December 2014 and re-assessment on August 2017.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> • Bukit Subur Estate & Bukit Makmur Estate – PT Lanang Agro Bersatu has carried out HCV assessment on 03 to 10 August 2010 and re-assessment on 13 to 15 April 2017. • Lanang Agro Bersatu smallholder has carried out HCV assessment on May 2012. • Gunung Tenerah Estate – PT Tebar Tanda Tenerah has carried out HCV assessment on 20 to 25 June 2013. • Gunung Alam Estate – PT Nusantara Sarana Alam has carried out HCV assessment on 19 to 26 August 2014. • Kedurang Perkasa Nabati Estate – PT Nusantara Sarana Alam has carried out HCV assessment on 19 to 26 August 2014. • Gunung Sejahtera Estate – PT Pertiwi Agro Sejahtera has carried out HCV assessment on 20 to 29 June 2013. • Gunung Mentari Estate – PT Kusuma Mentari Makmur has carried out HCV assessment on 14 to 20 April 2014. • Gunung Utama Estate – PT Agro Planindo Utama has carried out HCV assessment on 14 to 20 April 2014. <p>Disclosure of non-complaint land clearing & RaCP :</p> <p>All uncertified management units above has carried out land clearing activities since November 2005 without preceded by HCV identification/assessment and after year 2010 exception Gading Jaya Estate & Sepucuk Estate – PT Sampoerna Agro Tbk because it have not the year of planting more year 2010.</p> <p>Auditee has provided disclosure of non-complaint land clear-ing and/or LUCA document and document of RaCP process on behalf uncertified management units and certified management units. Uncertified management units such as PT Usaha Agro Indonesia (12,502 ha), PT Kedurang Prakarsa Nabati, PT Selatan Jaya Permai and Telaga Hikmah Small-holder and certified management units such as PT Telaga Hikmah, PT Mutiara Bunda Jaya, PT Sampoerna Agro Tbk (Sepucuk & Gading Jaya Estate), PT Aek Tarum, PT Gunung Tua Abadi and PT Bina Sawit Makmur. Whereas, other uncertified management units has been provided plan of submit LUCA to RSPO.</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Information of LUCA for some certified and uncertified management units as follow as :</p> <ul style="list-style-type: none"> • PT Telaga Hikmah: disclosure of non-complaint land clear-ing and LUCA document has submitted to RSPO secretariat. LUCA document has submitted dated on 07 September 2016 and the result of LUCA verification is zero compensation liability. • PT Mutiara Bunda Jaya : disclosure of non-complaint land clearing and LUCA document has submitted to RSPO secretariat. LUCA document has submitted dated on 10 March 2018 and the last of process is the auditee has submitted response from RSPO Secretariat dated on 16 December 2019. • PT Sampoerna Agro Tbk (Sepucuk & Gading Jaya Estate): disclosure of non-complaint land clearing and LUCA document has submitted to RSPO secretariat. LUCA document has submitted dated on 21 May 2018 and the last of process is the auditee has submitted LUCA revision based on response from RSPO Secretariat dated on 12 December 2018. • PT Usaha Agro Indonesia (12,502 ha) : disclosure of non-complaint land clearing and LUCA document has submitted to RSPO secretariat. LUCA document has submitted dated on 07 September 2016 and the result of LUCA verification is zero compensation liability. • PT Selatan Jaya Permai : disclosure of non-complaint land clearing and LUCA document has submitted to RSPO secretariat. LUCA document has submitted dated on 11 June 2018 and the last of process is auditee has submitted revision of LUCA based on response from RSPO Secretariat dated on 31 July 2018. • PT Kedurang Prakarsa Nabati : disclosure of non-complaint land clearing and LUCA document has submitted to RSPO secretariat. LUCA document has submitted dated on 13 April 2018 and the last of process is the auditee still preparing LUCA revision based on response from RSPO Secretariat dated on 04 October 2018. • Telaga Hikmah Smallholder : disclosure of non-complaint land clearing and LUCA document has submitted to RSPO

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>secretariat. LUCA document has submitted dated on 31 May 2018 and the last of process is the auditee has received response dated on 25 August 2019 from RSPO secretariat.</p> <p>Company has carried out New Planting Procedure (NPP) process for some management units under PT Sampoerna Agro Tbk i.e PT Sungai Rangit, PT Anugrah Palm Indonesia, PT Kusuma Mentari Makmur, PT Agro Planindo Utama, PT Pertiwi Agro Sejahtera, PT Usaha Agro Indonesia (2,283 ha), PT Telaga Hikmah, PT Sampoerna Agro Tbk, PT Mutiara Bunda Jaya and PT Lanang Agro Bersatu. Field and document verification has carried out by Certification Body (CB) and NPP reports has submitted to RSPO Secretariat.</p> <p>Auditor Verification: HCV assessment has been conducted for:</p> <ul style="list-style-type: none"> - PT Sungai Rangit, Feb 2013 - PT Lanang Agro Bersatu, August 2010 - PT Tebar Tandan Tenerah, June 2013 - PT Nusantara Sarana Alam, August 2014 - PT Kedurang Prakarsa Nabati, June 2016 - PT Pratiwi Agro Sejahtera, June 2013 - PT Kusuma Mentari Makmur, April 2014 - PT Agro Panindo Utama, April 2014 <p>Year of planting in each subsidiaries are:</p> <ul style="list-style-type: none"> - PT Sungai Rangit, 1998 to 2013 - PT Lanang Agro Bersatu, 2010 to 2018 - PT Tebar Tandan Tenerah, 2014 to 2017 (still develop) - PT Nusantara Sarana Alam, 2015 to 2017 (still develop) - PT Kedurang Prakarsa Nabati, 2018 (still develop) - PT Pratiwi Agro Sejahtera, 2013 to 2017 (still develop) - PT Kusuma Mentari Makmur, 2014 to 2017 (still develop) - PT Agro Panindo Utama, 2014 to 2017 (still develop) <p>LUCA assessment has been conducted for:</p> <ul style="list-style-type: none"> - PT Sungai Rangit, March 2016 - PT Lanang Agro Bersatu, February 2016 - PT Tebar Tandan Tenerah, July 2015 - PT Nusantara Sarana Alam, August 2015 - PT Kedurang Prakarsa Nabati, June 2016

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> - PT Pratiwi Agro Sejahtera, November 2015 - PT Kusuma Mentari Makmur, May 2015 - PT Agro Panindo Utama, July 2015 <p>The un-certified unit still on process to comply with RaCP process.</p>
ii.	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement: Year of planting in each subsidiaries are:</p> <ul style="list-style-type: none"> - PT Sungai Rangit, 1998 to 2013 - PT Lanang Agro Bersatu, 2010 to 2018 - PT Tebar Tandan Tenerah, 2014 to 2017 (still develop) - PT Nusantara Sarana Alam, 2015 to 2017 (still develop) - PT Kedurang Prakarsa Nabati, 2018 (still develop) - PT Pratiwi Agro Sejahtera, 2013 to 2017 (still develop) - PT Kusuma Mentari Makmur, 2014 to 2017 (still develop) - PT Agro Panindo Utama, 2014 to 2017 (still develop) <p>Subsidiaries of Sampoerna Agro Tbk has carried out New Planting Procedure (NPP) process for some management units under PT Sampoerna Agro Tbk i.e PT Sungai Rangit, PT Anugrah Palm Indonesia, PT Kusuma Mentari Makmur, PT Agro Panindo Utama, PT Perti-wi Agro Sejahtera, PT Usaha Agro Indonesia (2,283 ha), PT Telaga Hikmah, PT Sampoerna Agro Tbk, PT Mutiara Bunda Jaya and PT Lanang Agro Bersatu. Field and document verification has carried out by Certification Body (CB) and NPP reports has submitted to RSPO Secretariat.</p> <p>Auditor Verification: Uncertified unit that conduct land clearing area after 1 January 2010 without NPP will be subject of sanction.</p>
iii.	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>Company Group/Holding Statement: The organization have some procedures relate of land compensation i.e P-SAG-RO-CAS-02 & P-SAG-RO-CAS-03. It has covered mechanism of identifying legal and customary or user right and identifying people entitled to compensation.</p> <p>The organization has carried out some meetings or discussions/ socializations relate of land</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>acquisition since initial discussion/ meeting, information gathering and associated consultations, negotiation and agreement signed.</p> <p>Until end year 2019 that any uncertified management units have not land conflict and other uncertified management unit was solved or still in-process their the land conflict by each uncertified management units</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are no land conflicts for:</p> <ul style="list-style-type: none"> - PT Sungai Rangit - PT Lanang Agro Bersatu - PT Tebar Tandan Tenerah - PT Nusantara Sarana Alam - PT Kedurang Prakarsa Nabati - PT Pratiwi Agro Sejahtera - PT Kusuma Mentari Makmur - PT Agro Panindo Utama <p>Based on information in media online, known that:</p> <ul style="list-style-type: none"> - PT Sungai Rangit: No information of conflict - PT Lanang Agro Bersatu: https://www.hmstimes.com/sengketa-lahan-dengan-pt-lab-warga-sandai-lakukan-audiensi-ke-dprd-ketapang/ on March 2019 - PT Tebar Tandan Tenerah: No information of conflict - PT Nusantara Sarana Alam: No information of conflict - PT Kedurang Prakarsa Nabati: No information of conflict - PT Pratiwi Agro Sejahtera: No information of conflict - PT Kusuma Mentari Makmur: No information of conflict - PT Agro Panindo Utama: No information of conflict.
iv.	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Company Group/Holding Statement: There is no issue of labour disputes in uncertified unit. The company also has procedure for Internal complaints and grievances. The procedure is No P-SAG-RO-CAS-08 dated April 1st 2012.</p> <p>Auditor Verification:</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.
v.	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Company Group/Holding Statement: Companies comply with the regulations in accordance with the requirements of the RSPO 2.1 and 2.2 where there is no violation of the rules that are relevant to the plantation. The company has a mechanism to evaluate compliance with regulations, namely <i>Prosedur Hukum dan Persyaratan Lainnya</i>.</p> <p>Auditor Verification: Land legal process is still going on and there is a detail update progress documented by the company for each year.</p> <ul style="list-style-type: none"> - PT Sungai Rangit has had HGU and IUP. - PT Lanang Agro Bersatu has had HGU. - PT Tebar Tandan Tenerah has had IUP and location permit. The HGU is still on process. - PT Nusantara Sarana Alam has had IUP and location permit. The HGU is still on process. - PT Kedurang Prakarsa Nabati has had IUP and location permit. The HGU is still on process. - PT Pratiwi Agro Sejahtera has had IUP and location permit. The HGU is still on process. - PT Kusuma Mentari Makmur has had location permit. The IUP and HGU is still on process. - PT Agro Panindo Utama has had IUP and location permit. The HGU is still on process.

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 Re-Certification Assessment

NCR No.	:	2021.01	Issued by	:	Bayu Yogatama
Date Issued	:	20 November 2021	Time Limit	:	23 February 2023
NC Grade	:	Minor raise to Major	Date of Closing	:	23 February 2023
Standard Ref. & Requirement	:	2.3.2 Non-critical For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.			

Evidence observed (filled by auditor):
The company shows a list of FFB suppliers for the 2020-2021 period, from the document it is known that the company gets FFB supplies from traders (traders), including CV Bermuda Agro Mandiri, CV Bintang Sarana Abadi, CV Berkas Sentosa Abadi. Based on the Basic Info study, it is known that the three FFB suppliers are actively sending FFB to Selapan Jaya POM, while FFB data enters Selapan Jaya POM from 3 Traders during the Last 12 Months (November 2020 – October 2021) as follows:

- CV Bermuda Bintang Agro Mandiri as much as 4,316 tons
- CV Bintang Sarana Abadi as much as 3,167 tons
- CV Berkas Sentosa Abadi as much as 877 tons

In accordance with the SOP, the company has contracts with all FFB suppliers (traders/collectors) which are valid from January 2, 2021 – December 31, 2021, including:

- 002/SA/SPK/I/2021 with CV Bermuda Bintang Agro Mandiri
- 003/SA/SPK/I/2021 with CV Bintang Sarana Abadi
- 004/SA/SPK/I/2021 with CV Berkas Sentosa Abadi

In accordance with the SOP, the company has contracts with all FFB suppliers (traders/collectors) which are valid from January 2, 2021 – December 31, 2021, including:

- 002/SA/SPK/I/2021 with CV Bermuda Bintang Agro Mandiri
- 003/SA/SPK/I/2021 with CV Bintang Sarana Abadi
- 004/SA/SPK/I/2021 with CV Berkas Sentosa Abadi

Referring to the FFB Supply Cooperation Agreement which is owned in article 3 (Prerequisites as a Supplier) point 6, it is explained several obligations that need to be fulfilled by the supplier which reads. The first party has submitted to the second party the following information and information documents (hereinafter referred to as "Prerequisite Documents").

Complete identity which is at least in the form of name, address, name of management/director and Commissioner, NPWP, SIUP, TDP of the plantation company or in the form of name, address, copy of ID card of the planter/farmer who owns the plantation from whom the first party buys or obtains FFB, which subsequently it sends to a Third Party.

- Map of the location of the plantation block from where the FFB supplied by the first party comes from.
- The area of the plantation from which FFB is obtained, which will be supplied by the first party.
- Type and origin of FFB seeds to be supplied by the first party.
- Details regarding the year of planting per block of FFB to be supplied by the first party.

Non-Conformance Description (filled by auditor):
The company has not been able to show FFB source information obtained indirectly from FFB suppliers such as geolocation of FFB origin, proof of land ownership status by planters/farmers, valid planting/operational/trading permits.

The nonconformity recurred due to the incomplete information collected by the CPO Marketing Team on FFB suppliers/ collectors

Root Cause Analysis (filled by organization audited):

The mill has not made a list of FFB source information in accordance with the information required by the certification unit from the FFB supplier, as required in the related Indicators.

Correction (filled by organization audited):

The POM and Commercial sections will complete information on FFB sources obtained indirectly from FFB suppliers in accordance with the information required by the certification unit from FFB suppliers, at a minimum:

- FFB supplier geolocation coordinates data. Especially for FFB originating from the yard, the coordinates of the village office or cooperative can be used.
- Proof of land rights: Certificate of Land (SKT)/Certificate of Customary Land (SKTA)/Certificate of Ownership (SHM), *Hak Guna Usaha* (HGU) or other proof of ownership that can be recognized by the authorities.
- Plantation operational permit in the form of Plantation Business Permit (IUP) or its equivalent (SPUP/ITUBP, etc.).

The CPO Marketing Team mediates and coordinates with several suppliers/collectors to ensure that information on FFB sources is fulfilled

Corrective Action (filled by organization audited):

Coordinate with commercial parties in order to convey information on FFB sources obtained indirectly from FFB suppliers in accordance with the information required by the certification unit from FFB suppliers, with the minimum data obtained as described in the Corrective Action column.

The CPO Marketing Team ensures that all suppliers/collectors are able to fulfill information on the source of FFB who are suppliers according to the RSPO Principles & Criteria, such as information:

- Name of owner (farmer)
- Land area of the owner (farmer)
- Coordinate points, etc

Assessor Evaluation and Conclusion (filled by auditor):

Verification 07 January 2022

The unit of certification describes the root cause analysis, corrective actions, and plans for proof of improvement to be implemented. The description is acceptable. Next, please show documents related to proof of repair as described in the correction column. In addition, please indicate the program and the required data collection timeline. Non-conformance No. 2021.01 is declared **unfulfilled**.

Follow up on next audit (filled by auditor):

Verification on November 25, 2022

The company has not been able to show documents related to evidence of improvement for this indicator. Therefore, this discrepancy is increased in status to Major (Raised to Major).

Verification January 12, 2023

The company shows evidence of improvement in the form of:

- List of farmers supplying collectors to CV Bermuda Agri Mandiri, CV Bintang Sarana Abadi, and CV Berkat Sentosa Abadi. Each collector consists of 1 farmer. The list contains addresses and coordinates of farmers' land.
- Evidence of ownership certificates from 5 farmers, with details for CV Bermuda Agri Mandiri: 2 people; CV Blessing Sentosa Abadi: 1 person; CV Bintang Sarana Abadi: 2 people.
- Root cause analysis, improvement and corrective action are still the same as the previous assessment.

In addition, there are still a number of things that must be completed by the company, including:

1. Analysis of the root causes of why this nonconformity reoccurred in the ASA 1.1 assessment
2. Repairs along with preventive actions in accordance with the root cause analysis that has been made.

3. Show documentation of repairs and preventive actions that have been prepared.
Based on the description above, the nonconformity is still not open.

Verify 23 February 2023

The company has shown evidence of improvement in the form of a list of farmers from each FFB supplier along with the coordinates of the farmers' estate. From the proof of improvement submitted, this nonconformance has been fulfilled and will be observed again in the next assessment related to the completeness of proof of land ownership of each farmer and the planting/operational/trade license (if any) from each FFB supplier.

Verified by : **Mohamad Amarullah/Asystasya Aishah Silalahi**

NCR No.	: 2021.02	Issued by	: Rindu Galih Rezza Rachmansyah
Date Issued	: 20 November 2021	Time Limit	: 18 February 2022
NC Grade	: Major	Date of Closing	: 10 March 2022
Standard Ref. & Requirement	3.6.2 Critical Monitoring the effectiveness of the OHS plan to manage OHS risks in people.		
Evidence observed &			
<p>1. Based on the OSH license monitoring document for workers at Selapan Jaya Mill in 2021, where there are 4 steam aircraft operators, 2 lift and transport operators and 1 general OHS expert whose license has expired. The certification unit also has an OHS Work Program and an OHS Training Plan for Selapan Jaya Mill for 2021, of which there are several plans as follows:</p> <ul style="list-style-type: none">• Training plan for obtaining/renewing license as a boiler operator in October 2021.• Training plan to obtain/renew license as Electrical OHS Expert in June 2021.• Training plan for obtaining/renewing license as General OHS Expert in March 2021.• Training plan to obtain/renew license as operator of power and production (genset/turbine) in October 2021. <p>However, all of these plans were not implemented in 2021 until the audit activities were carried out.</p> <p>2. The certification unit also re-examines the extension plan for workers' OHS licenses that have expired in 2021 by 2022 for Selapan Jaya Mill, starting from the licenses for lift and transport operators, OHS Experts, boiler operators and so on. However, the unit of certification has not been able to show the necessary evaluation as a basis for rescheduling/changing plans from those previously determined.</p> <p>3. Based on the results of observations and interviews with engine room operators at Selapan Jaya Mill, it is known that in one day there are 3 shifts of working time for engine room stations, but these workers do not yet have an OHS license as a power and production operator to operate generators or turbines that there is. In the 2021 OHS training plan this has been planned but has not been realized until now.</p> <p>4. Based on the results of document studies and field observations at Selapan Jaya Mill, it is known that the certification unit has 2 generator engines with a capacity of more than 200 KVA and a turbine with a capacity of more than 200 KVA, the certification unit also has 1 electrical OHS technician, however does not yet have an Electrical OHS Expert as regulated in Manpower Regulation No. 12 of 2015. In the 2021 OHS training plan this has been planned but has not been realized so far.</p>			
Non-Conformance Description (filled by auditor): The unit of certification has not shown sufficient evidence that all OHS work programs and OSH training plans have been carried out, evaluated, documented and assessed for effectiveness on a regular basis.			
Root Cause Analysis (filled by organization audited): The unit has not evaluated the OHS work program and in particular for licensed officers on a regular basis			
Correction (filled by organization audited): The unit evaluates the OHS work program and in particular for licensed officers for the Year 2020-2021.			

Corrective Action (filled by organization audited):

Implement the OHS work program and especially for licensed officers who have been evaluated.

Assessor Evaluation and Conclusion (filled by auditor):
Verification 07 January 2022

The unit of certification describes the root cause analysis, corrective actions, as well as evidence of improvement plans that will be implemented. The description is acceptable. Next, please show several documents as described in the root cause and correction description column, including the following:

- The results of the evaluation of the fulfillment of the needs of operators with special OHS qualifications.
- The 2022 training work plan program along with a budget that has been approved by the authorized company representative.
- Evidence of communication with PJK3 regarding the realization of the training implementation.

Based on the explanation above, Non-conformance No. 2021.02 is declared unfulfilled.

Verify February 20, 2022

The unit of certification has shown some evidence of additional improvements as follows:

- Evaluation document of OHS license ownership at PT Sampoerna Agro – Selapan Jaya Mill in 2021 which was carried out on December 15, 2021. The results of the evaluation contained several records related to OHS licenses that had expired and workers who did not have OHS licenses including the following:
 - ❖ 4 workers who have OHS licenses as boiler Operators have expired.
 - ❖ 1 worker who has an OHS license as a First Aid Officer has expired.
 - ❖ 2 workers who have OHS licenses as Lifting Operators have expired.
 - ❖ 1 worker who has an OHS license as a OHS Expert has expired.
 - ❖ 1 engine room operator who does not yet have an OHS license as an operator of a production and power.
 - ❖ process operators who do not have an OHS license as a boiler operator.
 - ❖ 1 assistant who will later be appointed as an Electrical OHS Expert.
 - ❖ 1 assistant who will later be appointed as a Fire OHS Expert.
- Memorandum Document No. 0630/PKS SJ/X/2021 dated October 5, 2021 regarding the Application for Fire OHS Expert Certification Training, from the Selapan Jaya Mill Manager to the Head of HR Operation. Where in the memo includes the names of workers who will be proposed to attend training and the basic regulations as an obligation to have a Fire OHS Expert.
- Memorandum Document No. 0733/PKS SJ/XII/2021 dated 22 November 2021 regarding the application for OHS Operator License Certification Training at Selapan Jaya Mill, from the Selapan Jaya Mill Manager to the Head of HR Operations. Where in the memo lists as many as 13 workers who will be included in the OHS training as Boiler Operators, Storage Tank Operators, Production & Power Operators, Welders, Electrical Technicians, and Electrical OHS Experts.
- Memorandum Document No. 0493/PKS SJ/VIII/2021 dated August 13, 2021 regarding Extension of Operational License (SIO) and OHS Expert, from Selapan Jaya Mill Manager to Head of HR Operation. Where in the memo includes the names of 7 workers who will extend the OHS license for Lifting Operators, Boiler Operators, Electrical Technicians and OHS Experts.
- Letter No. 171/SA/HRS/XI/2021 dated 22 November 2022 concerning Requests for Training of Fire OHS Experts and Electrical OHS Experts, from PT Sampoerna Agro to the Manpower and Transmigration Office of Sumatera Selatan Province (can be shown proof of handover on the same date with a stamp and signature of the recipient). The letter contains an application to provide the training at PT Sampoerna Agro in December 2021.
- Letter No. 130/SA/HRS/VIII/2021 dated August 5, 2021 regarding Application for Extension of General OHS Expert License, from PT Sampoerna Agro to the Manpower and Transmigration Office of Sumatera Selatan Province (can be shown proof of handover on the same date with a stamp and signature receiver). The letter contains the name and number of PT Sampoerna Agro's General OHS Expert certificate whose Decree has expired for renewal.
- PT Sampoerna Agro's 2022 Training Plan which was prepared by the Head of HR Operations on December 31, 2021 and prepared by the company leadership. In the program, there are 16 training plans that will be carried

out in 2022 such as training for General OHS Experts, Fire OHS Experts, Lifting Operators, Electric OHS, Welders, and others.

From the evidence of improvement above, there are still some things that have not been shown by the company, namely:

- The results of the evaluation of the work program and OHS training in 2021.
- OSH work program in 2022.
- The 2022 training program does not fully cover training/extension of OHS licenses such as Boiler Operators and Production & Power Operators, both of which are included in one of the evaluation points in 2021 that are needed in 2022, but have not been included in the 2022 training program Please pay attention again and be given an explanation.
- In the evaluation results of OHS license ownership at PT Sampoerna Agro in 2021, not all have been identified and evaluated. This is evidenced by the fact that there are still workers who are planned to be included in order to obtain an OHS license (according to Memorandum No. 0733/PKS SJ/XII/2021 dated November 22, 2021) that have not been fully included in the evaluation. Please pay attention again and be given an explanation.
- Document update process for extension of Decree OHS Expert of PT Sampoerna Agro which has been submitted to the Manpower and Transmigration Office of Sumatera Selatan Province since August 5, 2021 in accordance with Letter No. 130/SA/HRS/VIII/2021.
- Response from the Manpower and Transmigration Office of Sumatera Selatan Province to provide training for Fire OHS Expert and Electrical OHS Expert in December 2021 at PT Sampoerna Agro in accordance with Letter No. 171/SA/HRS/XI/2021 dated 22 November 2022. If it has been approved, please show proof of its implementation and if it is not approved, please show the next plan.
- Proof of follow-up for the realization plan to obtain new OHS licenses for workers who have been proposed to attend training as Boiler and Production & Power Operators in accordance with Memorandum No. 0733/PKS SJ/XII/2021 dated November 22, 2021. The evidence can be in the form of communication with PJK3 for training registration or proof that the workers have been registered with PJK3 for training.
- Document update process of OHS license renewal for 4 boilers operators in accordance with Memorandum No. 0493/PKS SJ/VIII/2021 dated August 13, 2021. If the extension has been completed, please show the new license, but if not, show the latest update.

Based on the explanations and descriptions above, it is stated that this discrepancy has not been fulfilled.

Verification March 10, 2022

The unit of certification has shown some evidence of additional improvements as follows:

- Evaluation document for 2021 OHS work program conducted on December 31, 2021 with discussions related to licensed OSH training activities and license renewal for workers who already have OHS licenses which have expired in 2021. The result is that the company makes work programs and certified OHS training in 2022 which was approved by the Selapan Jaya Mill Manager on February 01, 2022. In the program, one of them has included plans for training and extension of licensed OSH that have not been realized in 2021 (OHS Expert, Fire OHS Expert, Transport Operators, Steam Planes, Production Power Planes, Electric OHS Expert, Welders, etc.) and will be implemented/targeted to be completed in 2022.
- PT Sampoerna Agro's 2022 training plan prepared by the Head of HR Operations on January 02, 2022 and prepared by the company's leadership. In the program, there are 16 training plans that will be carried out in 2022 such as training for General OHS Experts, Fire OHS Experts, Lifting Operators, Boiler, Production & Power Operators, Electric OHS Expert, Welders, and others.
- PT Sampoerna Agro (Mill Selapan Jaya) worker's OHS license evaluation document which was created and updated on 15 December 2021, which includes all workers who already have a valid OHS license, its validity period has expired (currently in the process of being extended in related parties) to workers who do not yet have an OHS license but are planning to participate in training targeted at 2022. The licenses included include General OHS Experts, Fire OHS Experts, Lifting Operators, Boiler, Production & Power Operators, Electric OHS Expert, Welders, and others.
- Letter No. 026/SA/HRS/III/2021 dated March 3, 2021 from PT Sampoerna Agro to the Manpower and Transmigration Office of Sumatera Selatan Province related to the Application for Extension of the OHS License

- for Boiler Operators for the Sampoerna Agro Group as many as 14 workers (3 of whom are workers from PT Sampoerna Agro – Mill Selapan Jaya). The letter has been received by the agency on March 4, 2021. To find out the progress of the license extension, the company also shows Certificate No. 560/23/Nakertrans/II/2022 dated 16 February 2022 from the Manpower and Transmigration Office of Sumatera Selatan Province related to the management and progress of the OHS license extension for 14 workers (3 of whom are workers from PT Sampoerna Agro – Mill Selapan Jaya) which is still in process at the Ministry of Manpower.
- Certificate No. 560/28/Nakertrans/II/2022 dated February 16, 2022 from the Department of Manpower and Transmigration of Sumatera Selatan Province related to the management and progress of the extension of the General OHS Expert PT Sampoerna Agro – Mill Selapan Jaya which is still in process at the Ministry of Manpower. (This letter is a reply to Letter No. No. 130/SA/HRS/VIII/2021 dated August 5, 2021 from PT Sampoerna Agro)
 - Letter No. 023/SA/HRS/III/2021 dated March 3, 2021 from PT Sampoerna Agro to the Department of Manpower and Transmigration of Sumatera Selatan Province related to the Application for Extension of the OHS License for Lifting Operators for the Sampoerna Agro Group as many as 29 workers (4 of whom are workers) from PT Sampoerna Agro – Mill Selapan Jaya). The letter was received by the agency on March 4, 2021. Certificate No. 560/33/Nakertrans/II/2022 dated 16 February 2022 from the Manpower and Transmigration Office of Sumatera Selatan Province related to the management and progress of the extension of the PT Sampoerna Agro – Mill Selapan Jaya Lifting Operator which is still in process at the Ministry of Manpower.
 - Letter No. 149/SA/HRS/XI/2021 dated November 3, 2021 from PT Sampoerna Agro to the Manpower and Transmigration Office of Sumatera Selatan Province related to the Application for the Extension of the OHS License for Lifting Aircraft Operators for the Sampoerna Agro Group as many as 31 workers (4 of whom are workers) from PT Sampoerna Agro – Mill Selapan Jaya). The letter has been received by the agency on November 3, 2021. Certificate No. 560/31/Nakertrans/II/2022 dated 16 February 2022 from the Manpower and Transmigration Office of Sumatera Selatan Province related to the management and progress of the extension of the PT Sampoerna Agro – Mill Selapan Jaya Lifting Operator which is still in process at the Ministry of Manpower.
 - Letter No. 025/SA/HRS/III/2021 dated March 3, 2021 from PT Sampoerna Agro to the Department of Manpower and Transmigration of Sumatera Selatan Province related to the Application for Extension of Welding License for the Sampoerna Agro Group as many as 12 workers (1 of them are workers from PT Sampoerna Agro – Selapan Jaya). The letter was received by the agency on March 3, 2021. Certificate No. 560/34/Nakertrans/II/2022 dated February 16, 2022 from the Manpower and Transmigration Office of Sumatera Selatan Province related to the management and progress of the extension of the PT Sampoerna Agro - Selapan Jaya Welder License which is still in process at the Ministry of Manpower.
 - Letter No. 024/SA/HRS/III/2021 dated March 3, 2021 from PT Sampoerna Agro to the Department of Manpower and Transmigration of Sumatera Selatan Province related to the Application for Extension of the Electrician's K3 License for the Sampoerna Agro Group as many as 19 workers (1 of them are workers from PT Sampoerna Agro – Selapan Jaya). The letter was received by the agency on March 3, 2021. Certificate No. 560/30/Nakertrans/II/2022 dated February 16, 2022 from the Manpower and Transmigration Office of Sumatera Selatan Province related to the management and progress of the extension of the OHS Electrical Technician License of PT Sampoerna Agro - Selapan Jaya which is still in process at the Ministry of Manpower.
 - Letter No. 131/SA/HRS/X/2021 dated October 5, 2021 from PT Sampoerna Agro to the Department of Manpower and Transmigration of Sumatera Selatan Province related to the Application for Extension of the Fire Fighting OHS License for the Sampoerna Agro Group as many as 11 workers (2 of whom are workers from PT Sampoerna Agro – Selapan Jaya). The letter was received by the agency on October 5, 2021. Certificate No. 560/29/Nakertrans/II/2022 dated February 16, 2022 from the Manpower and Transmigration Office of Sumatera Selatan Province related to the management and progress of the extension of the PT Sampoerna Agro - Selapan Jaya OHS Fire Management License which is still in process at the Ministry of Manpower.
 - Letter No. 035/SA/HRS/II/2021 dated 18 February 2021 from PT Sampoerna Agro to the Manpower and Transmigration Office of Sumatera Selatan Province related to the Application for Extension of the First Aid Officer License for the Sampoerna Agro Group as many as 49 workers (5 of whom are workers from PT Sampoerna Agro – Selapan Jaya). The letter was received by the agency on October 5, 2021. Certificate No. 560/32/Nakertrans/II/2022 dated February 16, 2022 from the Manpower and Transmigration Office of Sumatera Selatan Province related to the management and progress of the extension of the First Aid Officer License of

- PT Sampoerna Agro – Selapan Jaya which is still in process at the Ministry of Manpower.
- The company can show a reply email from PT Cahaya Sampurna Abadi (PJK3) on March 10, 2022 related to information on the training schedule for Fire OHS Experts, Lifting Operators, Boilers, Production & Power Operators, Pressure Vessels & Storage Tanks, Interpreters Welding and Electrical OHS in 2022. This email is to reply to an email from PT Sampoerna Agro dated March 09, 2022 regarding a request for a training schedule to register workers from the PT Sampoerna Agro Group to take part in the training in 2022. PT Cahaya Sampurna Abadi is the recommended PJK3 by the Department of Manpower and Transmigration of Sumatera Selatan Province to PT Sampoerna Agro to be able to provide OSH training in accordance with applicable laws and regulations.
 - There is also an attachment from PT Cahaya Sampurna Abadi's Email dated March 10, 2022 to PT Sampoerna Agro, namely Letter No. 084/CSA/III/2022 dated March 10, 2022 regarding the previous email response explaining that there is a training schedule for 2022 in accordance with the training plan to be followed including:
 - General K3 Expert Training on March 16 – 29, 2022.
 - Electrical K3 Expert Training on March 14 – April 01, 2022.
 - Training of Fire K3 Experts on 11 – 13 April 2022.
 - Lifting Aircraft Operator K3 Training on 18 – 21 April 2022
 - Welder Training on 16 – 21 May 2022.
 - OHS Training for Steam, Pressure Vessel and Storage Tank Operators on 01 – 29 August 2022.
 - OSH Training for Production Power Aircraft Operators from 03 – 31 October 2022.

Based on the explanation and description above, this discrepancy is declared to have been met and will be re-observed at the time of the next assessment related to the realization of the training plan to obtain the stipulated K3 license along with the realization of the license extension which has expired since 2021.

Follow up on next audit (filled by auditor):

Verification on November 25, 2022

The results of the auditor's verification of the workers' OHS license documents revealed that several OHS licenses had expired. Further explanation is described in the surveillance audit results-1.1.

Verified by : Mohamad Amarullah dan Rindu Galih Rezza Rachmansyah

NCR No.	: 2021.03	Issued by	: Mohamad Amarullah
Date Issued	: 20 November 2021	Time Limit	: 18 February 2022
NC Grade	: Major	Date of Closing	: 21 January 2022
Standard Ref. & Requirement	3.8.9 Critical Outsourcing Activities <ol style="list-style-type: none"> The mill shall not outsource its milling activities. In cases where the mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced Indonesia National Interpretation RSPO Principles & Criteria 2018 33 activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification. The mill shall ensure the following: <ol style="list-style-type: none"> The mill has legal ownership of all input material to be included in outsourced processes. The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. 		

	<p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>
<p>Evidence observed (filled by auditor): Unit of certification shows several agreement with RSPO-certified product transporter, for example as follows:</p> <ul style="list-style-type: none"> • Agreement No. 001/CPO/SA/AW/I/2021 dated 02 January 2021 with CV Alam Wijaya. • Agreement No. 009/CPO/SA/MBAM/I/2021 dated 02 January 2021 with PT Maju Bersama Anggiat Miduk. <p>Non-Conformance Description (filled by auditor): Clauses which mention that the certification body (CB) has access to the outsourcing contractor to conduct assessment on their system and operations if an audit is deemed necessary, is not available.</p>	
<p>Root Cause Analysis (filled by organization audited): Different of point of view in interpreting Indicator 3.8.9. Formerly, access for CB to conduct audit on contractor operations and system has conducted via interview through giving contact number of contractor PIC. Thus, specific clauses on documented form is considered unnecessary.</p>	
<p>Correction (filled by organization audited): To revise contract agreement with certified product transporter that including clauses which mention that the CB has access to the outsourcing contractor to conduct assessment on their system and operations if an audit is deemed necessary.</p>	
<p>Corrective Action (filled by organization audited): To make sure that new clauses that mentioned in correction column has added on the new contract and agreed by the contractors company.</p>	
<p>Assessor Evaluation and Conclusion (filled by auditor): Verification 21 January 2022 Unit of certification shows draft of contract that will be used for the coming agreement with third party contractor that handle RSPO certified product transportation. Clauses which mentioned that contractor company is willing to be audited towards RSPO SCCS and ISCC when necessary by the CB appointed by the unit of certification is presented in Point 13.10. Furthermore, contact number of contractor PIC is informed in Appendix 3 of agreement. The contract is signed by Director from PT SA and Contractor. Sighted contract with contractor PT Maju Bersama Anggiat Miduk No. 009/CPO/AT/MBAM.I/2022. The contract valid for 1 (one) year up to 31 December 2022.</p> <p>Based on root cause and corrective action analysis, as well as correction evidence given, NCR No. 2021.03 is stated closed.</p>	
<p>Follow up on next audit (filled by auditor): Verification on November 25, 2022 Based on the verification results of the agreement documents with contractors for transporting certified product (CPO) it is known that the agreement includes a clause that a third party is willing to be audited by a Certification Body if necessary.</p>	
Verified by	: Mohamad Amarullah

NCR No.	:	2021.04	Issued by	:	Rindu Galih Rezza
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			Rachmansyah
Date Issued	: 20 November 2021	Time Limit	: 23 February 2023
NC Grade	: Minor raise to Major	Date of Closing	: 23 February 2023
Standard Ref. & Requirement	6.2.7 Non-Critical Permanent workers are employed for all main work performed by the unit of certification. Temporary workers and casual daily workers are limited to temporary or seasonal work		
Evidence observed & <ul style="list-style-type: none">Based on the review of Hikmah Dua Estate's manpower documents, it is known that currently the certification unit still has 279 workers with PHL status (Free Daily Workers) who are employed for various types of work, such as harvesting and maintenance.Based on the results of observations and interviews with harvest workers at Hikmah Dua Estate, it is known that there are still workers with PHL status (Free Daily Workers) who work as harvest workers.In the explanation in Law no. 13 of 2003, which explains that the criteria for permanent work are work that is continuous, uninterrupted, not limited by time and is part of a production process in one company or work that is not seasonal. Where from this explanation, harvesting work is one of the permanent jobs and cannot be employed for workers with PKWT status (Specific Time Work Agreement) or PHL (Free Daily Workers), where this is again clarified in Kepmenaker No. 100 in 2004.The unit of certification has not yet been able to show evidence that the use of PHL workers (Free Daily Workers) has been carried out in accordance with Kepmenaker No. 100 of 2004, starting from working days and types of work that can be done.			
Non-Conformance Description (filled by auditor): The unit of certification has not been able to show sufficient evidence that non-permanent workers and casual daily workers are limited to temporary or seasonal work and are in accordance with the applicable laws and regulations.			
Root Cause Analysis (filled by organization audited): The company has identified and monitoring the absence of daily workers from the results of the monitoring the application of PHL (daily workers) is in accordance with applicable laws and regulations. However, the company has not yet identified the types of work that are permanent and non-permanent from all employees			
Correction (filled by organization audited): Identify non-permanent workers and daily worker in accordance with applicable laws and regulations, such as: <ul style="list-style-type: none">Number of working days 21 days or more for 3 consecutive monthsdaily work is prioritized for maintenance work and other jobs outside of the main job.Delivering identification and monitoring KHLMake identification of the type of work permanent/main and non -permanent			
Corrective Action (filled by organization audited): <ul style="list-style-type: none">Employing non-permanent workers and daily workers in accordance with applicable laws and regulations.Monitoring absent KHL.Make a KHL appointment plan for the type of work to remain according to company needs.			
Assessor Evaluation and Conclusion (filled by auditor): Verification 07 January 2022 The unit of certification describes the root cause analysis, corrective actions, as well as evidence of improvement plans that will be implemented. The description is acceptable. Furthermore, please show several documents as described in the description of the problem and correction column, including the following: <ul style="list-style-type: none">Company identification results related to permanent and non-permanent work.The results of the identification of the need for permanent workers and company contracts in each type of work that employ PHL workers.			

- Implementation of working days for workers with PHL status in accordance with the laws and regulations.
- Future implementation plans for compliance with applicable laws and regulations for PHL.
- For corrective actions, it is better to add a routine monitoring mechanism to ensure that all PHL workers comply with the applicable laws and regulations along with supporting evidence.

Based on the explanation above, Non-conformance No. 2021.04 is declared unfulfilled.

Follow up on next audit (filled by auditor):

Verification on November 25, 2022

The company has not been able to show documents related to evidence of improvement for this indicator. Therefore, this discrepancy is increased in status to Major (Raised to Major).

Verification on February 23, 2023

- The company shows evidence of improvement in the form of:
- Identification of absences and types of work of KHL in the Hikmah Dua plantation which informs employ ID, names of workers, positions, types of work and others consisting of 301 workers consisting of harvesters, maintenance and others. The document also informs the results of monitoring absenteeism in 2022 for all jobs that employ KHL.
- Submission of permanent worker in 2022 with a total of 20 workers who have been proposed for appointment. For example, a worker with the initials HY was submitted on February 7, 2022 based on the memo dated 0169/HD/II/2022.
- Action plan for appointing permanent workers for permanent work at the Hikmah Dua plantation. From this information it is known that the planned appointment of KHL is 60 workers. 20 workers have been appointed in 2022, another 20 are planned to be appointed in 2023 and another 20 are planned in 2024.
- Letter of approval for the appointment of KHL to become permanent workers. For example memo No. 0129/HRS/IV/2022 dated 28 April 2022 to 5 employees
- Identification of the requirements for hiring permanent workers in 2022. In this document, information on hiring issues and their follow-up is provided.
- Plans to appoint 13 KHL workers in February 2023 consisting of 9 harvest workers, 2 foremen, 1 loader and 1 machine operator.
- Memorandum of submission for 13 workers with No. 0165/HD/II/2023 dated 7 February 2023

Based on the explanation above, the non-compliance is declared Fulfilled and will be observed again in the next assessment.

Verified by

:

Rindu Galih Rezza Rachmansyah/Rizliani Aprianita Hsb

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-1.1 Assessment

NCR No.	:	2022.01	Issued by	:	Radytio Puspanjana
Date Issued	:	25 November 2022	Time Limit	:	Next surveillance
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	3.4.2 For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.			

Evidence observed (filled by auditor):

- The implementation of environmental management and monitoring are explained in the RKL-RPL document for semester 1 of 2022 (coverage of PT SA Selapan Jaya Mill and Plasma), while the implementation includes:
 - Erosion rate
 - Water quality
 - Air quality and noise
 - Vegetation and wildlife
 - Diversity of aquatic biota
 - Community perception
 - Prevention of forest and land fires.
- For the scope of the Jadi Mandiri Smallholder Scheme of the RKL-RPL in semester 1 of 2022 environmental significant impacts consist of:
 - Erosion rate
 - Water quality
 - Air quality and noise
 - Vegetation and wildlife
 - Diversity of aquatic biota
 - Community perception
 - Prevention of forest and land fires.

Social aspect

As a form of social management, the company has developed/compiled by involving independent parties in conducting social impact assessments related to the company's operational activities. In the social study, the affected villages were 17 villages for each smallholder, for example Suka Sari village, Kerta Mukti village, Gedong Rejo village, Sedyo Mulyo village, Bumi Makmur village etc. The social impact assessment has covered all operation area i.e POM, Hikmah Dua estate and all smallholder. The social impact assessment was first carried out in January 2017 by Sonokeling as a follow-up to the results of the assessment, there are several recommendations / matrices for social impact management and monitoring plans, including:

Internal Impact

- Natural resources
- Human Resources
- Economic resources
- Socio-cultural
- Infrastructure

External impact

- Implementation of OHS
- PPE
- Worker representatives
- Competency Development
- Wages
- Employee Welfare Benefits
- Patterns of communication

As one of the improvement efforts and taking into account the latest situation from 2017, the company carried out Stakeholder Consultation for the PT SA social impact report which was carried out in 2020. The results of the SIA review include:

- Economic aspects, welfare, employment and increasing income.
- Social, cultural and security aspects
- The educational aspect

The SIA review was carried out by involving the local community, in a discussion group forum activity for the District level conducted on April 7 2021, 8 local villages in 3 Districts (Mesuji Raya, Pedamaran and Pedamaran timur) conducted from March to October 2021.

The company also shows the planning and monitoring matrix and the implementation of the 2021 SIA, namely:

External

- Natural resources
- Human Resources
- Economic resources
- Socio-cultural
- Infrastructure

Internals

- Implementation of OHS
- PPE
- Worker representatives
- Competency Development
- Wages
- Employee Welfare Benefits
- Patterns of communication

Based on the results of a document review and field visit, information was obtained that KUD Bina Sejahtera, KUD Sedia Mukti, Jadi Mandiri and KUD Maju Lancar have carried out replanting activities between 2020 and 2021.

The unit of certification shows the report document on the implementation of the 2021 Social Impact Planning and Monitoring and the report on the implementation of the Environmental Planning and Monitoring (RKL-RPL semester 1 of 2022), but there are still significant impacts that have not been covered in the implementation of the Social and environmental Impact Planning and Monitoring, namely for impacts important for replanting activities.

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

The company has not been able to provide sufficient evidence that the plan and implementation of the management and monitoring of social and environmental impacts have covered all the significant impacts arising from operational activities, namely for replanting activities.

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

Correction *(filled by organization audited):*

Corrective Action *(filled by organization audited):*

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

Follow up on next audit (filled by auditor):

Verified by

:

NCR No.	:	2022.02	Issued by	:	Firda Tarunajaya
Date Issued	:	November 25st, 2022	Time Limit	:	February 23rd, 2023
NC Grade	:	Major	Date of Closing	:	December 2nd, 2022
Standard Ref. & Requirement	:	3.6.2 The effectiveness of the H&S plan to address health and safety risks to people is monitored			
Evidence observed (filled by auditor): Based on the OSH license monitoring document for workers at Selapan Jaya POM in 2022, there are licenses that have expired and some are in the process of being renewed, as follows:					
NO	DOCUMENT		DEPARTMENT	DATE OF ISSUE	VALIDITY PERIOD
1	Lift Aircraft		Wheel Loader Operators	06-Oct-17	06-Oct-22
2	Steam Boiler		Power House Operators	18-Apr-16	18-Apr-21
3	Steam Boiler		Boiler Operators	22-Sep-17	22-Sep-22
4	Steam Boiler		Boiler Operators	22-Sep-17	22-Sep-22
5	Steam Boiler		Boiler Operators	22-Sep-17	22-Sep-22
6	Lift Aircraft		Excavator Operators	06-Oct-17	06-Oct-22
7	Lift Aircraft		Hoisting Crane Shift 1 Operators	06-Oct-17	06-Oct-22
8	Lift Aircraft		Hoisting Crane Shift 2 Operators	06-Oct-17	06-Oct-22
9	Steam Boiler		Sterilizer Line 1 Shift 1 Operators	18-Apr-16	18-Apr-21
10	Lift Aircraft		Wheel Loader Operators	15-Mar-16	15-Mar-21
11	General OSH Expert SJ POM		General OSH Expert	15-Aug-18	15-Aug-21
12	Steam Boiler		Sterilizer Line 1 Shift 2 Operators	18-Apr-16	18-Apr-21
13	Class D fire safety specialist		Engine Room Operators	24-Oct-18	24-Oct-21
14	Class D fire safety specialist		Sortation Operators	24-Oct-18	24-Oct-21
15	Class D fire safety specialist		Warehouse Staff	24-Oct-18	24-Oct-21
16	Class D fire safety specialist		General Foreman	24-Oct-18	24-Oct-21
17	Class D fire safety specialist		Sample Boy	24-Oct-18	24-Oct-21
18	Class D fire safety specialist		Wheel Loader Operators	24-Oct-18	24-Oct-21
19	Class D fire safety specialist		Boiler Operators	24-Oct-18	24-Oct-21
20	Class D fire safety specialist		WTP Operators	24-Oct-18	24-Oct-21
21	Class D fire safety specialist		Biogas Administrator	24-Oct-18	24-Oct-21
22	Class D fire safety specialist		Officer Staff	24-Oct-18	24-Oct-21
23	Class D fire safety specialist		WTP Operators	24-Oct-18	24-Oct-21
24	Class D fire safety specialist		Team Leader	24-Oct-18	24-Oct-21
25	Class D fire safety specialist		General OSH Expert	24-Oct-18	24-Oct-21

26	Class D fire safety specialist	Boiler Operators	24-Oct-18	24-Oct-21
27	General OSH Expert Hikmah Dua Estate	General OSH Expert	-	-

Based on interviews with 2 Sterilizer Operators, 1 Boiler Operator and 1 Machine Room Operator stated that they had attended OSH operator training, but had never held an operator card. After reviewing the documents, it was discovered that the Boiler Operator license with the initial IWM expired on September 22nd, 2022, and the sterilizer operator with the initial RH was not included as an operator who had attended OSH steam aircraft operator training. Likewise with the sterilizer operator with the initial R, the license expires on April 18, 2021. As for the Power House operator with the initial M, the validity period for the K3 license for power and production aircraft operators is until March 27th, 2023. In addition, there are 9 OSH Lift and Transport licenses that have expired at Hikmah Dua Estate and the company has not been able to show the progress of their renewal.

The CH shows the progress of renewing the SJ POM OSH license, namely:

- On August 13th, 2021 the PKS Manager sent an email to the Head of HR Operation regarding the extension of operational license and General OSH expert (there were 8 people: 2 K3 Lift and Transport Aircraft, 4 Steam Aircraft Operators, 1 OSH Electrical Technician, 1 General OSH expert)
- November 17th, 2022 KTU Factory submitted an application for extension of AK3 Fire, AK3 Electricity, and SIO for Power and Production Aircraft, Electricians, Welders, Steam Aircraft Operators and Lift and Transport Aircraft.
- November 18th, 2022 HRGA followed up with information, as follows:
 - Regarding the application for fire safety expert certification, namely Pontas Masioloan Silalaen, a OSH Service Company has been sought but is constrained by quotas (1 class minimum of 10 people) & can be entered in class D first because they cannot go straight to class A (OSH fire expert). We will notify you if the class from OSH Service Company can be done.
 - Regarding General License Operator OSH Expert, OSH Steam Operator, OSH Lift Aircraft and OSH Electricity as many as 6 people, the extension has been carried out through the South Sumatra Provincial Manpower and Transmigration which is still being processed at the Jakarta Ministry of Manpower. If it hasn't been completed yet, we will look for OSH Service Company parties who can carry out the extension in question (part of it has been running) and Rey Haster has been refreshed Back on October 19th -21st 2022
 - For laboratory analyst operator shift 1 a.n Andik Wijayanto, we have tried but no OSH Service Company has been able to do it
 - Whelloader operator a.n Asmar Harahap is being processed with OSH Service Company

On November 22nd, 2022 the SJ POM Manager made a memo to the Regional Head HR Services regarding the names of those who would take part in the OSH training, namely 1 OSH power and production aircraft, 1 OSH Electrician, 1 Electrical Technician, 3 Welders, 6 Steam Aircraft Operators and 1 Storage Tank Operator

Non-Conformance Description (filled by auditor):
The company has not been able to show sufficient evidence that the OSH plans to manage OSH risks in people have been monitored effectively

Root Cause Analysis (filled by organization audited):
The company has made an evaluation of the validity period of the OSH license and has submitted an application for an extension of the OSH license to the Sumatra Selatan Province Manpower and Transmigration Agency. However, based on the information received, the agency no longer has the authority to extend the OSH license

Correction (filled by organization audited):
Coordinate with agencies that have authority, in this case OSH Company, to apply for an extension returning OSH labor licenses that have expired

Corrective Action (filled by organization audited):
Monitoring the application for an extension of the OSH license for workers who has expired (both by manual monitoring and by system in IT applications)

Assessor Evaluation and Conclusion (filled by auditor):
Verification 29 November 2022

The certification unit describes the root cause analysis, corrective actions, as well as proof of improvement plans to be implemented. This description is acceptable. Next, please show a number of documents as described in the columns describing the root of the problem, corrections and corrective actions, including the following:

- when to submit an application for an extension of the OSH license to the Sumatra Selatan Province Manpower and Transmigration Agency and also attach evidence that the designated agency no longer has the authority to extend the OSH license
- Evidence of coordination with the agency that has the authority to extend the OSH license and whether the certification unit has determined which agency is appointed to administer the OSH license
- Is there a special PIC who monitors the submission of OSH license extensions both manually and systemically in IT applications?
- Evaluation results of meeting the needs of operators with special OSH qualifications.
- The 2022 and 2023 training work plan programs along with the budget that has been approved by the authorized company representative.
- There is evidence of the Appointment Decree & authority card, a.n. Deki Rimon, is the person concerned still working at the Hikmah Dua Estate Unit? While when the Audit was conducted the person concerned was not at Hikmah Dua Estate

Verification 01 Desember 2022

The unit of certification shows new evidence that was not shown when the Audit was carried out, namely:

- Training plan PT. Sampoerna Agro, Tbk on 2022 prepared by the Head of HR Operation, Acting mutation letter. Assistant Head of Garden who is General OSH Expert of Hikmah Dua Estate from the location of Hikmah Dua Estate to Hikmah Satu Estate per. October 1, 2022.
- Decree of the Director General of Labor Inspection Development No. KEP.P68/DJPPK/II/2012 regarding the appointment of General OSH Expert Pontas Masioloan Silaen, ST for the company PT. Aek Tarum on 27 February 2012 valid for 3 years from the date of stipulation (valid until 27 February 2015)
- Memorandum No. 0630/PKS SJ/X/2021 from the Manager of Selapan Jaya Mill to the Head of HR Operations on October 5, 2021 regarding the application for a fire specialist OSH expert certificate a.n Pontas Masioloan Silaen
- Memorandum No. 0493/PKS/SJ/VIII/2021 from the Manager of Selapan Jaya Mill to the Head of HR Operations on August 13, 2021 regarding the extension of the operational license & general OSH expert in connection with the expiration of the OSH operational license of employees and staff at Selapan Jaya Mill, namely for a.n Pendarsyah (K3 Lift & transport aircraft), Sudaryo (OSH Electrical Engineer), Rasiman (OSH Steam Plane Operator), Thamrin (OSH Steam Plane Operator), Husni (OSH Steam Plane Operator), Agus Sukamto (OSH Steam Plane Operator), Rey Haster (General OSH Expert), Tumijan (OSH Plane lift & transport)
- Memorandum No. 0160/PKS SJ/III/2022 from Selapan Jaya Mill Manager to Head of HR Services on March 8, 2022 regarding requests for Whelloader operator training a.n Asmar Harahap (Whelloader Operator)
- Memorandum No. 0733/PKS SJ/XII/2021 from Selapan Jaya Mill Manager to Head of HR Services on November 22, 2021 regarding Operator & OSH Machinery Field for Selapan Jaya Mill staff and employees a.n Roni Pangliardi (Aircraft Power & Production), Uli Yuliana (OSH Expery Electricity), Ardi Bahar (Electrical Engineer), Rizal Suryatohir (Welder), (Zainal Arifin Jusru Las), Ristian Giantama (Welder), Sumbogo, Sabam Panjaitan, A. Fauzi, M. Iwan, Jumadi Situmorang, Rudi Hartono (Steam Plane Operator), Eko Supriyanto (Storage Tank Operator)
- Memorandum No. 0594b/PKS SJ/IX/2021 from Selapan Jaya Mill Manager to Head of HR Services on September 20, 2021 SIO Class D firefighter operator
- Letter No. 069/SA/HRS/IV/2022 from the Head of HR Operation to the Head of the Prov. Sumatera Selatan was accepted by Nanang Sukrisna an application for an extension of the lift and transport aircraft operator license

- Certificate No. 566/32/Nakertrans/II/2022 on 16 February 2022 from the Regional Coordinator of the Labor Inspectorate of OKI Regency by Nanang Sukrisna stating that the letter of application for the extension of the First Aid License No. 035/SA/HRS/II/2022 on 18 February 2022 an extension has been submitted and is currently in the process.
- Certificate No. 560/28/Nakertrans/II/2022 on 16 February 2022 from the Regional Coordinator of the Labor Inspectorate of OKI regency by Nanang Sukrisna stating that the application letter for OSH general expert License extension No. 130/SA/HRS/VIII/2021 on 05 August 2021 an extension has been submitted and is currently in the process.
- Certificate No. 80/30/Nakertrans/II/2022 16 February 2022 from the Regional Coordinator of the Labor Inspectorate of OKI regency by Nanang Sukrisna stating that the application letter for OSH Electrical Technician License extension No. 024/SA/HRS/III/2021 on March 3, 2021 an extension has been submitted and is currently in the process
- Certificate No. 560/29/Nakertrans/II/2022 on 16 February 2022 from the Regional Coordinator of the Labor Inspectorate of OKI regency by Nanang Sukrisna stating that the letter of application for the extension of the OSH Fire Extinguisher License No. 131/SA/HRS/X/2021 on 05 October 2021 an extension has been submitted and is currently in the process.
- Certificate No. 566/25/Nakertrans/II/2022 on 16 February 2022 from the Regional Coordinator of the Labor Inspectorate of OKI regency by Nanang Sukrisna stating that the letter of application for the extension of the OSH Fire Extinguisher License No. 131/SA/HRS/X/2021 on 05 October 2022 an extension has been submitted and is currently in the process.
- Certificate No. 560/31/Nakertrans/II/2022 on 16 February 2022 from the Regional Coordinator of the Labor Inspectorate of OKI regency by Nanang Sukrisna who stated that the application letter for the extension of OSH Lift and Transport Aircraft License No. 149/SA/HRS/XI/2021 on 03 November 2021 an extension has been submitted and is currently in the process
- Certificate No. 560/23/Nakertrans/II/2022 on 16 February 2022 from the Regional Coordinator of the Labor Inspectorate of OKI regency by Nanang Sukrisna stating that the letter of application for the extension of OSH Steam Operator License No. 026/SA/HRS/III/2021 on March 3, 2021 an extension has been submitted and is currently in the process

In addition, the unit of certification shows other evidence, namely:

- Appointment Letter No. 5/9448/AS.02.04/X/2020 which was ratified by the Minister of Manpower of the Republic of Indonesia on 19 October 2020 a.n Deki Rimon which is valid for 3 years from the date of stipulation (until 19 October 2023), the person concerned has been transferred from the Hikmah Dua Estate to the Hikmah Satu Estate since October 1, 2022.
- OSH Expert Authorization Card No. 43881/PK3/AJ/16/2020/P1 on 19 October 2020 which is valid until 19 October 2023
- File of employee OSH license evaluation results which contains monitoring of 33 Mill and Estate licenses that have expired
- Letter of application for extension and manufacture of OSH license on 26 November 2022 from the Head of HR Operation to the Director of Service Company of OSH PT. Bina Wahyu Ramadhani as many 33 employees
- Statement letter from the Director of Service Company of OSH PT. Bina Wahyu Ramadhani who stated that PT. Bina Wahyu Ramadhany received an application letter for the manufacture of 33 OSH licenses.
- Letter of response from the Director of PJK3 PT. Bina Wahyu Ramadhani on 28 November 2022 which stated that 33 OSH licenses of PT. Sampoerna Agro Tbk is in the process of extension at the Indonesian Ministry of Jakarta
- Certificate No. 057/192/Nakertrans/XI/2022 on 29 November 2022 from the Regional Coordinator of the Labor Inspectorate of OKI regency by Nanang Sukrisna stating that the application letter from PT. Sampoerna Agro No. 217/SA/HRS/XI/2022 on 29 November 2022 regarding an application for an explanation of the authority to extend

the OSH license, it can be submitted that according to *Permenaker* No. 02 of 1992 that those who have the authority to extend the OSH license are not from the Sumatera Selatan Province Manpower and Transmigration Agency but the Indonesian Ministry of Manpower through Service Company of OSH who have an *SKP* (Decision of Appointment) from the Ministry of Manpower of the Republic of Indonesia, so for an extension of the OSH license to apply directly to each Service Company of OSH related field

- Excel file entitled General Budget 2023 Selapan Jaya Mill, includes an External Training Budget in July 2023 of Rp. 20,000,000, - but there is no budget approval sheet and no details regarding the intended external training.
- The company has not been able to show the realization of the training proposed by the Selapan Jaya Mill Manager to the Head of HR Operations. The company also shows the External Training Budget in July 2023 of Rp. 20,000,000, but the authorization sheet is not yet known and there are no details regarding the intended external training and OSH license renewal, this is in accordance with *Permenaker* No. 02 of 1992 that those who have the authority to extend the OSH license are not from the Manpower and Transmigration Agency of Sumatra Selatan Province but the Indonesian Ministry of Manpower through Service company of OSH who have an *SKP* (Certificate of Appointment) from the Indonesian Ministry of Manpower.

Based on the above explanation, Discrepancy No. 2022.02 is declared unfulfilled.

Verification on 2 Desember 2022

The company shows evidence of improvement in the form of:

- External Training Budget for 2023 which has been approved by company management
- Recapitulation of the realization of the 2021/2022 training
- Details of the 2023 External Training Plan
- Letter the Operator Certification and Development Report from Service Company of OSH to the Director of OSH Institutional Development, Ministry of Manpower of the Republic of Indonesia. For example Report Number 221/SP/BWR/XI/2022 on 21 November 2022 for Lift and Transport Aircraft Operators.
- Screenshot of OSH license extension through the online system.

Based on the above improvements, the discrepancies have been met and will be observed in the next assessment

Verified by : **Firda Tarunajaya**

NCR No.	: 2022.03	Issued by	: Firda Tarunajaya
Date Issued	: 25 November 2022	Time Limit	: 23 February 2023
NC Grade	: Major	Date of Closing	: 23 February 2023
Standard Ref. & Requirement	: 7.2.3 Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.		
Evidence observed: The CH shows several documents related to pesticides, including: <ul style="list-style-type: none">- Memorandum No. 124/DRD/XI/2019 which was approved by the R & D Director on November 15th, 2019 regarding the cessation of the use of paraquat and chemicals that are prohibited from using it based on RSPO provisions.- Recapitulation of plans and realization of planting Beneficial Plants in 2022 covering an area of 1,863 Ha, as an alternative to suppressing leaf pests without using insecticides- SOP for Plant Pest and Disease Control, that the control of plant pests and diseases is carried out based on census results with attacks above the threshold. Based on the document review, there is data on pesticide use for 2021 and for the period from January to October			

2022 as shown in the following table:

NO	PESTICIDE	INGREDIENTS	2021	Jan – Oct 2022
1	Decis 25 EC	<i>Deltametrin 25g/L</i>	890,30 lt	952,22 lt
2	Metsulindo	<i>Glyphosate</i>	517,88 Lt	832,54 Lt
3	Dithane M-45	<i>Mankoze</i>	323,44 Kg	667,68 Kg
4	Life/Line	<i>Amonium Glifusate</i>	351 Lt	604,20 Lt
5	Racumin	<i>Kumatetralil</i>	2,39 Kg	7,60 Kg

Based on the data above, it shows that the unit of certification has not been able to demonstrate that the use of pesticides has been minimized in accordance with the IPM plan

Non-Conformance Description:

The company has not been able to show sufficient evidence that the use of pesticides is minimized in accordance with the IPM plan

Root Cause Analysis:

Based on the inspection results of the A&Ci Team, there was an increase in pest attacks, including:

1. In August 2022 there was an increase in attacks by apogonia by 7.3% and Culvularia by 12.5% in nurseries as well as an increase in weeds Eleusine Indica and Siperus Rotundus so it is recommended to control using Dithane, Decis and Ammonium Glyphosate
2. In June 2022 there was an increase in the growth density of kentosan weeds on disks of 15.6% so it is recommended to use Glyphosate
3. Based on the results of the rat census in March 2022 there was an increase in rat attacks in low-lying areas and there were recommendations for controlling these attacks from the results of the visit of the head of A&Ci.

Correction:

1. Coordinate with the A&Ci team to request inspection results and recommendations for using pesticides for pest control.
2. Make a justification for increasing the use of pesticides in 2022

Corrective Action:

Minimizing the use of pesticides in pest control activities.

Assessor Evaluation and Conclusion:

Verification on February 23rd 2023

The company shows evidence of improvement in the form of:

- Justification for the use of chemicals Decis, Dithane, Ammonium Glifusate, Racumin
- Memorandum of commitment to the use of pesticides policy No. 010/DRD/II/2022 from the R & D Director to the COO, regarding plant maintenance, especially the control of Plant Pest Organisms, which includes pests, diseases and weeds, is carried out with Integrated Plant Pest identification. In addition, there is a commitment to control pests selectively based on targets and populations, to use biological agents in pest control and to use pesticides wisely and to carry out various studies on an ongoing basis to reduce the use of pesticides.
- Use of the Ammonium Glifusate pesticide by the Nursery Division and the Work Achievement Book for spraying.
- Use of pesticides Dhitane and Decis Nursery Division and Book of monitoring spraying of Plant Pest Oil Palm Seeds Planting on 2022
- Work performance book of cyrcle chemist.
- Inspection form for plant maintenance in the mature area.

- Recommendations for agronomy continuous improvement from the Sumatra Region Department, regarding the palm control program for all plantations in area 2 which can be carried out simultaneously with the Cycle Path spray program. The recommended mixture of herbicides used is Glyphosate (150 ml) + Urea (100 gr) + Methyl Metsulfuron (5 gr) + Adhesive (15 ml) per cap with the spray volume adjusting to area conditions (75-120 effective lt per Ha) and on blocks-blocks that are in lowland areas after flooding and found indications of traces of rat attack are immediately applied to the palm if the area is still inundated. Application without having to do a census first and given 2 rat poison baits
- Rat poison application workbook

Based on improvement above, the discrepancy is declared fulfilled and will be observed again at the next assessment

Follow up on next audit:

Verified by : **Firda Tarunajaya**

3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	1.1.5	The CH has the opportunity to complete the stakeholder list for all third parties who work with plantation units, KUD, and factories, for example Hazardous and Toxic Waste transporters
2	2.2.2	The CH has the opportunity to ensure documentation of regulatory compliance for third parties
3	3.8.11	The CH has the opportunity to convey to the certification body before the audit activities are carried out if there is an additional use of contractors for handling certified products.
4	6.7.3	The CH has the opportunity to ensure the provision/replacement of PPE for workers
5	6.7.4	The Certification Unit has the opportunity to ensure the <i>BPJS</i> registration program for all workers (KUD)

3.4.4. Noteworthy Positive Components



No	Description
1	Management commitment to apply the principles of sustainable palm oil management
2	Fairly good cooperation in providing documents during the audit process
3	Already have a Biogas Plant

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Gender committee <ul style="list-style-type: none"> During 2021 to 2022 there were no reports of sexual harassment of female workers There has been socialization regarding the rights of women workers, including menstrual leave, the right to breastfeed children at work, pregnancy check-ups, There is no discrimination in employment opportunities and promotion opportunities for female workers The gender committee routinely identifies pregnant and lactating women, to ensure that female workers can work properly 	<p>In general, there are no negative issues that need further clarification</p>
Labor Union <ul style="list-style-type: none"> Determination of the minimum wage at PT SA for 2022 based on the Sumatera Selatan Provincial Minimum Wage for 2022. The company has implemented overtime in accordance with applicable regulations. The company has registered all workers in the BPJS program The company has conducted special and periodic (general) health checks on a regular basis PPE has been provided free of charge and replaced if damaged Complaints to the company are only related to housing complaints and have been followed up by the company. The company has implemented a wage, overtime and employment system that complies with applicable regulations. There are cases of termination of workers. However, it has been resolved through the industrial court There are cases of work accidents and have been resolved by the company 	<p>Implementation related to employment has been explained in principle 6</p> <p>Related to termination case, has been described in indicator 4.2.3</p> <p>Related to work accident case, has been described in 6.7.4</p>
Plantation Agency of Ogan Komering Ilir Regency <p>There is no issue and complaint from surrounding village. Company has report the progress report of plantation activity regularly. As for KUD, some of members already has the plantation permit (STDB), and some members still in process of making STDM. Company also has implemented and report the CSR activity.</p>	<p>There is no negative issue need further verification.</p>
Maribaya, Embacang Permai, and Pulau Geronggang Village <p>In general, company already implement CSR activity for surrounding village. However, there are some area that still not touched by CSR of PT Telaga Hikmah or Sampoerna Agro.</p>	<p>Regarding land owners who are not willing to be compensated has been verified in indicator 4.8.1 – 4.8.3.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>There is no land conflict with surrounding village. However, there are some land owners from Pulau Geronggang who are not willing to be compensated. They are some members of KUD Pulau Geronggang.</p> <p>There is no complaint about environment pollution or land fire. Some of the villagers also work in Hikmah Dua Estate.</p>	
<p>Previous land owner Pulau Geronggang (2 land owner)</p> <p>There are some land owner who are not willing to be compensated.</p> <p>Compensation calculation and payment has smoothly been conducted since 1997 to 2003 without any conflict and other following negative issues. Furthermore, the process has involving respective agencies and elders in the society. Compensation was carried out through voluntary without any coercion or by forced. There are no customary rights inside estate operational areas</p>	<p>Regarding land owners who are not willing to be compensated has been verified in indicator 4.8.1 – 4.8.3.</p>
<p>FFB Supplier Bintang Sarana</p> <p>There is no complain about late payment. FFB supplier has comply with the applicable regulation. The changes of FFB price is always notified to the supplier.</p>	<p>There is no negative issue need further verification.</p>
<p>Manpower Agency of Ogan Komering Ilir Regency</p> <p>There is no case related to industrial relations disputes that occurred in the certification unit. Company already submit the mandatory manpower report. Certification unit has been implemented minimum wage, overtime and others labor standard in accordance with government regulation. Every labor union has been verified by agency and still active in certification unit.</p>	<p>There is no negative issue need further verification.</p>
<p>Contractor (FFB transport)</p> <ul style="list-style-type: none"> - Company has socialized related RSPO and company regulation such as contractor have to include their workers in BPJS, wages accordance with regulation and etc. - No complaint related to payment or others 	<p>There is no negative issue need further verification</p>
<p>(https://mitrapolri.com/hotman-gugat-pt-sampurna-agro-karena-tak-bayar-pesangon/),</p>	<p>The company has shown documentation of the progress of complaint handling in the form of a Decision Letter from the Industrial Relations Court at the Palembang District Court Decision Number 81/Pdt.Sus-PHI/2022/PN.Plg dated November 21, 2022. From this decision it is known that the company is required to pay compensation due to termination to Mr Hotman. From the results of interviews with management, information was obtained that</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
	compensation had not been given according to the court's decision because the plaintiff had not accepted the decision and planned to take the case to a higher level.

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">  <p>PT Sampoerna Agro Management Representative</p> <p><u>Yusi Rosalina</u></p> <p>Thursday, 23 February 2023</p> </div> <div style="text-align: center;">  <p>Mutuagung Lestari Lead Auditor</p> <p><u>Rizliani Aprianita Hsb</u></p> <p>Thursday, 23 February 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	Plantation agency	Ogan Komering Ilir Regency	-	By phone	November 22 nd , 2022	√	
2	Manpower agency	Ogan Komering Ilir Regency	-	By phone	November 22 nd , 2022	√	
3	Environment Agency	Ogan Komering Ilir Regency	-	By phone	November 22 nd , 2022		√
4	Land National Agency	Ogan Komering Ilir Regency	-	By phone	November 22 nd , 2022		√
5	Maribaya, Embacang Permai, and Pulau Geronggang Village	Ogan Komering Ilir Regency	-	Direct interview	November 22 nd , 2022	√	
6	Previous land owner of Pulau Geronggang Village	Ogan Komering Ilir Regency	-	Direct interview	November 22 nd , 2022	√	
7	FFB Supplier Bintang Sarana	Ogan Komering Ilir Regency	-	By phone	November 24 th , 2022	√	
8	Labor Union	Ogan Komering Ilir Regency	-	Direct interview	November 21 st , 2022	√	
9	Gender committee	Ogan Komering Ilir Regency	-	Direct interview	November 21 st , 2022	√	
10	Hikmah Dua Estate: - 1 Harvesting Foreman Div. 1 Hikmah Dua Estate - 7 Harvester Div. 1 Hikmah Dua Estate - 1 warehouse officer - 1 welder - 1 workshop officer - 2 paramedics	Ogan Komering Ilir Regency	-	Direct interview	November 23 rd , 2022	√	
11	KUD Bina Sejahtera: • 1 Warehouse Staff • 2 Castration Foreman • 2 Castration Employee	Ogan Komering Ilir Regency	-	Direct interview	November 24 th , 2022	√	
12	KUD Bina Tani Mulya • 2 KUD committee • Harvester	Ogan Komering Ilir Regency	-	Direct interview	November 23 rd , 2022	√	
13	KUD Marga Mulya • 1 Warehouse staff • 4 Harvester • 1 head of the farmer group	Ogan Komering Ilir Regency	-	Direct interview	November 22 nd , 2022	√	
14	KUD Sedia Mukti • 3 spraying workers • 1 census worker	Ogan Komering Ilir Regency	-	Direct interview	November 24 th , 2022	√	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
	• 1 warehouse staff						
15	Mill • 1 WWTP operator • 3 operator biogases • 1 WTP operator • Process workers	Ogan Komering Ilir Regency	-	Direct interview	November 22 nd , 2022	✓	
16	Sawit Watch	Indonesia	info@sawitwatch.or.id	Email	November 15 th , 2022	-	✓
17	WALHI	Indonesia	informasi@walhi.or.id	Email	November 15 th , 2022	-	✓
18	AMAN	Indonesia	rumahaman@cbn.net.id	Email	November 15 th , 2022	-	✓
19	WWF	Indonesia	wwf-indonesia@wwf.or.id	Email	November 15 th , 2022	-	✓
20	CPO Transporter	Ogan Komering Ilir Regency	-	By phone	November 22 nd , 2022		✓

Appendix 2. Assessment Program

DATE	21 – 26 November 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 21 November 2022		
07.35 – 08.45	JAKARTA (CGK) → PALEMBANG (PLM) – GA 102	All Auditor
09.00 – 12.00	PALEMBANG → SITE	
14.00 – 15.00	Opening meeting <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit). Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification). 	
15.00 – 17.00	Public consultation <ul style="list-style-type: none"> Public consultation with Local Contractor & Supplier (including FFB supplier) Direct interview with internal stakeholders (ex. Bipartite or Labour Union, Gender Committee and Cooperative committee members) 	All Auditor
Tuesday, 22 November 2022		
08.00 – 12.00	Public consultation <ul style="list-style-type: none"> Public consultation to Government Agencies of Ogan Komering Ilir Distric by phone Stakeholder consultation (direct) to affected communities surrounding the plantations and previous land owner. Field Observation to KUD Marga Mulya Aspect to be verified: <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Environmental and Conservation/HCV management. Implementation of Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Clinic and Waste Management). Observation of Workers Facilities (Housing, School, Worship Place). Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Occupational Health & Safety Aspect 	AAS RDP RAH FTJ
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Field Observation Selapan Jaya POM <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Dispatch CPO) Inspection to Chemical Storage, Hazardous Waste Storage, Workshop, POME Pond & Land Application Implementation of Employment & Occupational Health & Safety Aspect, Processing Activity & Fire Control Simulation 	AAS RDP FTJ/RAH
Wednesday, 23 November 2022		
08.00 – 12.00	Field Observation to Hikmah Dua Estate Aspect to be verified:	

DATE	21 – 26 November 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Environmental and Conservation/HCV management. Implementation of Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Clinic and Waste Management). Observation of Workers Facilities (Housing, School, Worship Place). Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Occupational Health & Safety Aspect <p>Field Observation to KUD Bina Tani Mulya Aspect to be verified:</p> <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Environmental and Conservation/HCV management. Implementation of Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Clinic and Waste Management). Observation of Workers Facilities (Housing, School, Worship Place). Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Occupational Health & Safety Aspect 	<p>RDP</p> <p>RAH</p> <p>AAS</p> <p>FTJ</p>
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> Continue stakeholder consultation if needed Document review and completing audit checklist. Presentation of daily progress 	All Auditor
Thursday, 24 November 2022		
08.00 – 12.00	<p>Field Observation to KUD Sedia Mukti Aspect to be verified:</p> <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Environmental and Conservation/HCV management. Implementation of Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Clinic and Waste Management). Observation of Workers Facilities (Housing, School, Worship Place). Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Occupational Health & Safety Aspect <p>Field Observation to KUD Bina Sejahtera Aspect to be verified:</p> <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Environmental and Conservation/HCV management. Implementation of Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Clinic and Waste Management). Observation of Workers Facilities (Housing, School, Worship Place). Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) 	<p>RDP</p> <p>RAH</p> <p>AAS</p> <p>FTJ</p>

DATE	21 – 26 November 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none">Implementation of Occupational Health & Safety Aspect	
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	<ul style="list-style-type: none">Document review and completing audit checklist.Presentation of daily progress	All Auditor
Friday, 25 November 2022		
08.00 – 12.00	<ul style="list-style-type: none">Document review and completing audit checklist.Presentation of daily progress	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.00	Diskusi Internal	All Auditor
16.00 – 17.00	Closing Meeting: <ul style="list-style-type: none">Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timeline of CAR's, Conclusion)/Comments, Responses and Questions	
Saturday, 26 November 2022		
05.00 – 08.00	SITE → PALEMBANG	All Auditor
09.30 – 10.45	PALEMBANG (PLM) → JAKARTA (CGK) – GA 107	