

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

[✓] Surveillance

Name of Management Organization : **Gersindo Minang Plantation POM – PT Gersindo Minang Plantation, Subsidiary of Wilmar International Limited.**

Plantation Name : Gersindo Minang Plantation Estate (PT Gersindo Minang Plantation), Permata Hijau Pasaman-1 Estate and Permata Hijau Pasaman-2 Estate (PT Permata Hijau Pasaman).

Location : Jorong Tanjung Pangkal, Nagari Lingkung Aur, Pasaman Sub-District, Pasaman Barat District, Sumatera Barat Province, Indonesia.

Certificate Code : **MUTU-RSPO/038**

Date of Initial Registration : 21 April 2014

Date of Certificate Issue : 13 June 2019 Date of License Issue : 21 April 2023

Date of Certificate Expiry : 20 April 2024 Date of License Expiry : 20 April 2024

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.4	16 to 20 January 2023	Moh Arif Yusni, Benli Manurung, Rindu Galih Reza, and Alfiany Sukmawati	Haikal Ramadhan Kharismansyah	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.4	18 February 2023

TABLE OF CONTENT

FIGURE

Figure 1. Location Map of PT Gersindo Minang Plantation and PT Permata Hijau Pasaman	1
Figure 2. Operational Map of PT Gersindo Minang Plantation and PT Permata Hijau Pasaman	2
Abbreviations Used	3

1.0 SCOPE of the CERTIFICATION ASSESSMENT

1.1	Assessment Standard Used	5
1.2	Organization Information	5
1.3	Type of Assessment	5
1.4	Location of Mill and Plantations	5
1.5	Description of Area Statement	6
1.6	Planting Year and Cycle	6
1.7	Description of Mill and Supply Base	7
1.8	Estimate Tonnage of Certified Product	7
1.9	Other Certifications	8
1.10	Time-Bound Plan	8

2.0 ASSESSMENT PROCESS

2.1	Assessment Team	14
2.2	Assessment Methodology, Assessment Process and Locations of Assessment	14
2.3	Stakeholder Consultation and Stakeholders Contacted	18
2.4	Determining Next Assessment	18

3.0 ASSESSMENT FINDINGS

3.1	Summary of Assessment Report of the RSPO Certification	19
3.2	Conformity Checklist of Certificate and Logo Use	76
3.3	Summary of RSPO Partial Certification	77
3.4	Identification of Findings, Corrective Actions, Observations, Opportunity for Improvement and Noteworthy Positive Components	80
3.5	Summary of Arising Issues from Public, Management and Auditor Responses	84

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

4.1	Formal Signing of Assessment Findings	94
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APPENDICES

1.	List of Stakeholders Contacted in the RSPO Certification Process	95
2.	Assessment Program	98

Figure 2. Operational Map of PT Gersindo Minang Plantation and PT Permata Hijau Pasaman



Abbreviations Used

BKSDA	:	<i>Balai Konservasi Sumber Daya Alam</i> (Natural Resources Conservation Center)
BPBD	:	<i>Badan Penanggulangan Bencana Daerah</i> (Regional Disaster Management Agency)
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Security Agency)
BPN	:	<i>Badan Pertanahan Nasional/National Land Agency</i>
BOD	:	Biological Oxygen Demand
B3	:	<i>Bahan Beracun dan Berbahaya</i> (Hazardous Material)
CB	:	Certification Body
CEO	:	Chief Executive Officer
CLA	:	Collective Labor Agreement
COO	:	Chief Operation Officer
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
DPMPTSP	:	<i>Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu/Integrated Licensing Service Agency</i>
DPRD	:	<i>Dewan Perwakilan Rakyat Daerah/Regional People's Representative</i>
EFB	:	Empty Fruit Bunch
EHS	:	Environment health and Safety
EIA	:	Environment Impact Assessment
FFB	:	Fresh Fruit Bunch
FPIC	:	Free, Prior, Informed, Consent
FR	:	Frequency Rate
GAPKI	:	<i>Gabungan Pengusaha Kelapa Sawit Indonesia</i> (Indonesian Palm Oil Association)
GHG	:	Green House Gases
GMP	:	Gersindo Minang Plantation
GPS	:	Global Positioning System
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title)
HIRAC	:	Hazard Identification Risk Assessment and Control
HRD	:	Human Resource Department
IPM	:	Integrated Pest Management
ISCC	:	International Sustainability & Carbon Certification
IPAL	:	<i>Instalasi Pengelolaan Air Limbah/Waste Water Treatment Processes</i>
ISPO	:	Indonesian Sustainable Palm Oil
IUP	:	<i>Izin Usaha Perkebunan</i> (Plantation Business Permit)
IUP-B	:	<i>Izin Usaha Perkebunan Budidaya</i> (Plantation Business Permit for Cultivation)
IUP-P	:	<i>Izin Usaha Perkebunan Pengolahan</i> (Plantation Business Permit for Processing)
KER	:	Kernel Extraction Rate
KSU	:	<i>Koperasi Serba Usaha</i> (Multipurpose Cooperative)
KUD	:	<i>Koperasi Unit Desa</i> (Village Unit Cooperative)
LB3	:	<i>Limbah Berbahaya dan Beracun</i> (Hazardous Waste)
LOTO	:	Lock Out Tag Out
LSU	:	Leaf Sampling Unit
MSDS	:	Material Safety Data Sheet
OER	:	Oil Extraction Rate
OFI	:	Opportunity For Improvement
OHS	:	Occupational Health and Safety
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja/OHS Committee</i>

P3K	:	<i>Pertolongan Pertama Pada Kecelakaan (First Aid)</i>
PHP	:	<i>Permata Hijau Pasaman</i>
PK	:	Palm Kernel
PKO	:	Palm Kernel Oil
PKWT	:	<i>Perjanjian Kerja Waktu Tertentu</i>
PKWTT	:	<i>Perjanjian Kerja Waktu Tidak Tertentu</i>
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
RKL/RPL	:	<i>Rencana Kelola Lingkungan/ Rencana Pemantauan Lingkungan</i> (Environmental Management Plan / Environmental Monitoring Plan)
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare Threatened Endangered
SARBUKSI	:	<i>Serikat Buruh Perkebunan Indonesia</i>
SCCS	:	Supply Chain Certification Standard
SERBUNDO	:	<i>Serikat Buruh Indonesia (Worker Union)</i>
SIA	:	Social Impact Assessment
SOP	:	Standard Operational and Procedure
SPSI	:	<i>Serikat Pekerja Seluruh Indonesia (Worker Union)</i>
SR	:	Severity Rate
SSU	:	Soil Sampling Unit
SPK	:	Surat Perjanjian Kerjasama/ Later Off Agreement
SPPD	:	<i>Surat Pemberitahuan Pajak Daerah/ regional tax payment letter</i>
UKL/UPL	:	<i>Upaya Kelola Lingkungan/ Upaya Pemantauan Lingkungan</i> (Environmental Management Efforts / Environmental Monitoring Efforts)
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE OF THE CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used		
		<ul style="list-style-type: none"> Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020. RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020. 	
1.2	Organisation Information		
1.2.1	Organization name listed in the certificate	PT Gersindo Minang Plantation and PT Permata Hijau Pasaman subsidiary of Wilmar International Limited	
1.2.2	Contact person	Jules Sonny Parapat	
1.2.3	Organisation address and site address	<p>Indonesian Office Multivision Tower Lt. 15 Jl. Kuningan Mulia Kav. 9B, Kuningan, Jakarta, 12980, Indonesia.</p> <p>Site Office: Jorong Tanjung Pangkal, Nagari Lingkung Aur, Pasaman Sub-district, Pasaman Barat District, Sumatera Barat Province.</p>	
1.2.4	Telephone	(62-21) 29380777	
1.2.5	Fax	-	
1.2.6	E-mail	jules.parapat@id.wilmar-intl.com	
1.2.7	Web page address	www.wilmar-international.com	
1.2.8	Management Representative who completed the application for certification	Jules Sonny (Certification Lead Indonesia)	
1.2.9	Registered as RSPO member	2-0017-05-000-00 15 August 2005	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Mill: PT GMP Mill (Gersindo Minang Plantation) Supply Bases: <ul style="list-style-type: none"> GMP Estate (PT Gersindo Minang Plantation) PHP-1 and PHP-2 (PT Permata Hijau Pasaman) 	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Gersindo Minang Plantation	Jorong Tanjung Pangkal, Nagari Lingkung Aur, Pasaman Sub District, Pasaman Barat District, Sumatera Barat Province, Indonesia	N 0° 07' 10" E 99° 43' 10"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply	Location	Coordinate

Base		Latitude	Longitude
GMP Estate (PT Gersindo Minang Plantation)	Jorong Tanjung Pangkal, Nagari Lingkung Aur, Pasaman Sub District, Pasaman Barat District, Sumatera Barat Province, Indonesia.	N 0° 06' 48"	E 99° 43' 04"
PHP-1 Estate (PT Permata Hijau Pasaman)	Jorong Pisang Hutan, Kenagarian Sasak, Sasak Ranah Pasisie Sub District, Pasaman Barat District, Sumatera Barat Province, Indonesia.	N 0° 00' 39"	E 99° 44' 16"
PHP-2 Estate (PT Permata Hijau Pasaman)	Jorong Padang Jaya, Kenagarian Persiapan Maligi, Sasak Ranah Pasisie Sub District, Pasaman Barat District, Sumatera Barat Province, Indonesia.	N 0° 06' 47"	E 99° 37' 48"

1.5	Description of Area Statement				
1.5.1	Tenure				
	• State	5,861.40 Ha			
	• Community				
	Total				
1.5.2	Area Statement				
		GMP (Ha)	PHP 1 (Ha)	PHP 2 (Ha)	TOTAL (Ha)
	Total area	3,600.00	1,247.00	1,014.40	5,861.40
	Mature area	1,849.75	386.86	881.39	3,118.00
	Immature area	1,252.54	340.80	-	1,593.34
	Land preparation	-	463.18	-	463.18
	Mill	13.00	-	-	13.00
	Road, trench, emplacement	143.34	56.16	28.69	228.19
	Unplantable Area	10.98	-	21.59	32.57
	Nursery	15.33	-	-	15.33
	Occupation	259.02	-	80.81	339.83
	HCV	56.04	-	1.92	57.96
1.6	Planting Year and Cycles				
1.6.1	Age profile of planting year				
		GMP (Ha)	PHP 1 (Ha)	PHP 2 (Ha)	TOTAL (Ha)
	1996	-	-	164.83	164.83
	1997	-	214.66	672.94	887.60
	1998	-	-	43.62	43.62
	2014	122.13	-	-	122.13
	2015	508.19	-	-	508.19
	2016	334.22	-	-	334.22
	2017	349.08	-	-	349.08
	2018	298.98	-	-	298.98
	2019	237.15	172.20	-	409.35
	Subtotal Mature Area	1,849.75	386.86	881.39	3,118.00
	2019	-	183.42	-	183.42
2020	919.25	73.02	-	992.27	

	2021	333.29	84.36	-	417.65		
	Subtotal Mature Area	1,252.54	340.80	-	1,593.34		
	TOTAL	3,102.29	727.66	881.39	4,711.34		
1.6.2	New Planting area after January 2010		- 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 (%)
	GMP POM	60	248,783	45,200.87	18.17	10,105.87	4.06
	<i>*Production data source 12 months before assessment (January – December 2022)</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (ton/year)	Yield (ton/ha/ year)	Supplied to Mill	
						FFB (ton/year)	%
	GMP Estate	3,600.00	1,849.75	48,546.92	26.25	48,546.92	100.00
	PHP1 Estate	1,247.00	386.86	5,535.76	14.03	5,421.29	97.93
	PHP2 Estate	1,014.40	881.39	17,877.95	20.22	17,877.95	100.00
	TOTAL	5,861.40	3,118.00	71,960.63	26.25	71,846.16	99.84
	<i>*Production data source 12 months before assessment (January – December 2022)</i>						
1.7.3	FFB description from other source						
	Name of sources/Organization (RSPO certified / non-certified)	Type of Organization	number of smallholders	Production Area (Ha)	Supplied to Mill FFB (tones/year)		
	RSPO Certified						
	PT. AMP 4	Wilmar Group	-	-	7.11		
	RSPO Non-Certified						
	PT PHP 2 UNCERTIFIED AREA	Wilmar Group		20	239.71		
	PT. GMP PLASMA	Smallholder of PT GMP	1,039	2,030.23	24,839.73		
	PT. PHP I PLASMA	Smallholder of PT PHP 1	1,713	1,132.11	7,744.28		
	PT. PHP II PLASMA	Smallholder of PT PHP 2	1,708	921.12	5,965.86		
	OTHER	Independent supplier	-	-	138,140.15		
	TOTAL					176,936.84	
	<i>*Production data source 12 months before assessment (January – December 2022)</i>						
1.7.4	Product categories		FFB, CPO, PK				
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (Ton)	Actual Certified Volume from January – December 2022 (Ton)			
	FFB Processed		81,600	71,853.27			
	CPO Production		15,422	13,268.78			
	Palm Kernel (PK) Production		3,236	2,926.26			
1.8.2	Product selling						

Type of selling product		Actual selling product for last year (January – December 2022) (MT)							
CSPO sold as RSPO certified product		13,094.81							
CSPK sold as RSPO certified product		2,906.56							
CSPO sold under another scheme		0							
CSPK sold under another scheme		0							
CSPO sold as conventional		0							
CSPK sold as conventional		0							
<i>* Positive stock of and positive stok</i>									
1.8.3	Estimate of Certified FFB Claim								
	Name of Estate(s)	Total Area (Ha)	Production Area (Ha)	FFB (tones/year)	Yield (tones/ha/year)				
	GMP Estate	3,600.00	1,849.75	56,000	30.27				
	PHP1 Estate	1,247.00	386.86	7,000	18.09				
	PHP2 Estate	1,014.40	881.39	19,000	21.56				
	TOTAL	5,861.40	3,118.00	82,000	26.30				
	<i>*Projected FFB production for 12 months of certificate</i>								
1.8.4	Estimate of Certified Palm Product Claim								
	Name of Mill	Capacity (tones/ hour)	FFB Processed (tones/year)	CPO		Palm Kernel		Supply Chain Module	
Out put (tones)				Extraction (%)	Out put (tones)	Extraction (%)			
	GMP POM	60	82,000	15,580	19.00	3,485	4.25	MB	
	<i>*Projected CSPO and CSPK production for 12 months of certificate</i>								
1.9	Other Certifications								
	ISO 9001:2015			-					
	ISO 14001: 2015			-					
	ISO 45001:2018			-					
	ISCC			EU-ISCC-Cert-ID218-20220077 valid until 25 April 2023					
	ISPO			MUTU-ISPO/018 valid until 03 December 2024					
1.10	Time Bound Plan								
1.10.1	Time Bound Plan for Other Management Units								
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status			
	Mill	Time Bound Plan							
	Indonesia – Kalimantan Region								
	Mustika Sembuluh 1 POM	2010	Mustika Sembuluh 1	2010	Central Kalimantan	Certified			
		Mustika Sembuluh POM 2 (PT Mustika Sembuluh)	2015	Mustika Sembuluh 2	2010	Central Kalimantan	Certified		
				Mustika Sembuluh 3	2010	Central Kalimantan	Certified		
			KUD Bitu Maju Bersama	2014	Central Kalimantan	Certified			
	Kerry Sawit	2011	Kerry Sawit Indonesia 1	2011	Central Kalimantan	Certified			

Indonesia POM Kerry Sawit Indonesia POM (PT Kerry Sawit Indonesia)	1 2	2015	Kerry Sawit Indonesia 2	2011	Central Kalimantan	Certified
			Kerry Sawit Indonesia 3	2011	Central Kalimantan	Certified
			KUD Karya Bersama	2023	Central Kalimantan	-
			KUD Sejahtera Bersama	2026	Central Kalimantan	
			KUD Tabiku Makmur	2026	Central Kalimantan	
			KUD Kosudra	2026	Central Kalimantan	
Bumi Sawit Kencana POM (PT Bumi Sawit Kencana)		2013	Bumi Sawit Kencana 1	2013	Central Kalimantan	Certified
			Bumi Sawit Kencana 2	2013	Central Kalimantan	Certified
POM 1 and POM 2 (PT Sarana Titian Permata)		2026	Sarana Titian Permata 1	2026	Central Kalimantan	-
			Sarana Titian Permata 2	2026	Central Kalimantan	-
			Sarana Titian Permata 3	2026	Central Kalimantan	-
Mentaya Sawit Mas POM (PT Mentaya Sawit Mas)		2015	Mentaya Sawit Mas 1	2015	Central Kalimantan	Certified
			Mentaya Sawit Mas 2	2015	Central Kalimantan	Certified
			KUD Karya Makmur Pahirangan	2026	Central Kalimantan	-
Rimba Harapan Sakti POM (PT Rimba Harapan Sakti)		2015	Rimba Harapan Sakti 1	2015	Central Kalimantan	Certified
			Rimba Harapan Sakti 2	2015	Central Kalimantan	Certified
			Serba Usaha Makmur Sejahtera Cooperative	2026	Central Kalimantan	-
Karunia Kencana Permaisejati POM (PT Karunia Kencana Permaisejati)		2017	Karunia Kencana Permaisejati 1	2017	Central Kalimantan	Certified
			Karunia Kencana Permaisejati 2	2017	Central Kalimantan	Certified
			Karunia Kencana Permaisejati 3,	2017	Central Kalimantan	Certified
Agro Nusa Investama POM (PT Agro Nusa Investama (Sambas))		2019	Agro Nusa Investama (Sambas) Estate	2019	West Kalimantan	Certified
			KUD Cempaka Biru	2019	West Kalimantan	Certified
			KUD Sentama Lestari	2019	West Kalimantan	Certified
			Sri Maram Estate	2026	West Kalimantan	-
			Sri Maram Cooperative	2026	West Kalimantan	-
			Pusaka Abadi Nan Jaya Cooperative	2026	West Kalimantan	-
Bumipratama Khatulistiwa POM (PT Bumi Pratama Khatulistiwa)		2016	Bumi Pratama Khatulistiwa Estate	2016	West Kalimantan	Certified
			PT Buluh Cawang Plantation	2026	West Kalimantan	-
			KUD Buah Jubata	2026	West Kalimantan	-
Agro Nusa Investama (Landak) POM		2023	PT Agronusa Investama Pahauman Estate	2026	West Kalimantan	-
			Pratama Procentindo	2026	West Kalimantan	-

PT Agronusa Investama - Pahauman		Estate (PT Pratama Procentindo)			
Agro Palindo Sakti POM (PT Agro Palindo Sakti 2)	2023	Agro Palindo Sakti Estate	2026	West Kalimantan	-
		Putra Indotropical Estate (PT Putra Indotropical Estate)	2026	West Kalimantan	-
		Daya Landak Plantation Estate (PT Daya Landak Plantation)	2026	West Kalimantan	-
		Indoresin Putra Mandiri (PT Indoresin Putra Mandiri)	2026	West Kalimantan	-
Indonesia – Sumatera Region					
Pinang Awan POM (PT Perkebunan Milano)	2009	Sei Daun	2009	North Sumatera	Certified
		Batang Saponggol	2009	North Sumatera	Certified
		Marbau	2009	North Sumatera	Certified
Tania Selatan POM (PT Tania Selatan)	2010	Burnai Barat	2010	South Sumatera	Certified
		Burnai Timur	2010	South Sumatera	Certified
Kencana Sawit Indonesia POM (PT Kencana Sawit Indonesia)	2011	Kencana Sawit Indonesia (Division 1, Division 2 and Division 3)	2011	West Sumatera	Certified
AMP Plantation POM (PT AMP Plantation)	2011	AMP I	2011	West Sumatera	Certified
		AMP II	2011	West Sumatera	Certified
		AMP III	2011	West Sumatera	Certified
		AMP IV	2011	West Sumatera	Certified
		Primatama Mulia Jaya	2011	West Sumatera	Certified
		Tompek Tapian Kandis cooperative	2014	West Sumatera	Certified
		Mutiara Sawit Jaya cooperative	2014	West Sumatera	Certified
		Bukit Sandiang Tigo cooperative	2014	West Sumatera	Certified
		Agro Wira Masang cooperative	2014	West Sumatera	Certified
Buluh Cawang Plantation POM (PT Buluh Cawang Plantation)	2012	Bumi Arjo	2012	South Sumatera	Certified
		Dabuk Rejo	2012	South Sumatera	Certified
		Sukamulya	2012	South Sumatera	Certified
		Bambu Kuning	2012	South Sumatera	Certified
Gersindo Minang Plantation POM (PT Gersindo)	2012	Gersindo Minang Plantation	2012	West Sumatera	Certified
		Permata Hijau Plantation 1	2012	West Sumatera	Certified

Minang Plantation)		Permata Hijau Plantation 2	2012	West Sumatera	Certified
		PT Permata Hijau Pasaman (block 22)	2026	West Sumatera	-
Daya Labuhan Indah POM (PT Daya Labuhan Indah)	2013	Wonosari	2013	North Sumatera	Certified
		Sei Deras	2013	North Sumatera	Certified
		Cabang Dua (PT Milano)	2013	North Sumatera	Certified
Murini Samsam POM (PT Murini Sam Sam)	2015	Murini Sam Sam Estate	2015	Riau	Certified
		Part of PT Murini Samsam areas (466 ha)	2026	Riau	-
Musi Banyuasin POM (PT Musi Banyuasin Indah)	2023	Sei Selabu	2026	South Sumatera	-
		Sei Jarum	2023	South Sumatera	-
		Agro Palindo Sakti Estate	2022	South Sumatera	Certified
Sinarsiak Dianpermai POM (PT Sinarsiak Dianpermai)	2023	Sinarsiak Dianpermai Estate	2026	Riau	-
Agro Indah Persada 2 POM (PT. Agroindah Persada)	2023	Agrindo Indah Persada Estate	2026	Bangko – Jambi	-
Malaysia					
Sapi POM (PPB Oil Palms Berhad)	2008	Sapi 1	2008	Sandakan, Sabah, Malaysia	Certified
		Sapi 2	2008	Sandakan, Sabah, Malaysia	Certified
		Kiabau	2008	Sandakan, Sabah, Malaysia	Certified
Reka Halus POM (PPB Oil Palms Berhad)	2008	Reka Halus	2008	Sandakan, Sabah, Malaysia	Certified
Sabahmas POM (PPB Oil Palms Berhad)	2008	Sabahmas	2008	Lahad Datu, Sabah, Malaysia	Certified
Saremas 1 POM (PPB Oil Palms Berhad)	2010	Saremas	2010	Bintulu, Serawak, Malaysia	Certified
		Saremas 2 (Div D)	2010	Bintulu, Serawak, Malaysia	Certified
		Suai	2010	Bintulu, Serawak, Malaysia	Certified
Saremas 2 POM (PPB Oil Palms Berhad)	2010	Saremas 2 (exclude Div D)	2010	Bintulu, Serawak, Malaysia	Certified
		Kaminsky	2010	Bintulu, Serawak, Malaysia	Certified
		Segarmas	2010	Bintulu, Serawak, Malaysia	Certified
Ribubonus	2010	Ribubonus	2010	Sandakan, Sabah,	Certified

(PPB Oil Palms Berhad)				Malaysia	
Terusan POM (PPB Oil Palms Berhad)	2010	Terusan 1 + 2	2010	Sandakan, Sabah, Malaysia	Certified
		Rumidi	2010	Sandakan, Sabah, Malaysia	Certified
Sri Kamusan POM (PPB Oil Palms Berhad)	2011	Sri Kamusan	2011	Sandakan, Sabah, Malaysia	Certified
		Hibumas 1	2011	Sandakan, Sabah, Malaysia	Certified
		Hibumas 2	2011	Sandakan, Sabah, Malaysia	Certified
		Jebawang	2011	Sandakan, Sabah, Malaysia	Certified
		Sekar Imej	2011	Sandakan, Sabah, Malaysia	Certified
		Sapi Sugut	2011	Sandakan, Sabah, Malaysia	Certified
		Laba Utama (Div of Jebawang)	2023	Sandakan, Sabah, Malaysia	Acquired in 2019, 3 years till certification deadline (2022); but postponed till 2023 due to Covid-19 which impeded movement of assessor for SIA, HCV/ HCS assessments
Suburmas POM (PPB Oil Palms Berhad)	2023	Suburmas	2023	Bintulu, Serawak, Malaysia	Added into Wilmar Membership in 2018, 3 years till certification deadline (2021); but postponed till 2023 due to Covid-19 which impeded movement of assessor for SIA, HCV/ HCS assessments
Africa					
BOPP POM, Biase Plantation Limited	2014	Adum Bansa	2014	Western Region, Ghana	Certified
		Scheme Smallholder	2014	Western Region, Ghana	Certified
-	-	Treboum Smallholders	2023	Western Region, Ghana	
Biase Plantation Limited	2021	Calaro	2021	Cross River State, Nigeria	Certified
Biase Plantation Limited	2022	Calaro extension	2023	Cross River State, Nigeria	To be certified, NPP completed
Biase Plantation Limited	2020	Ibiae	2023	Cross River State, Nigeria	To be certified, NPP completed
Eyop Industries	2021	Ibad	2025	Cross River State, Nigeria	To be certified

	Eyop Industries	2020	Kwa Falls	2025	Cross River State, Nigeria	To be certified
	Eyop Industries	2021	Oban	2025	Cross River State, Nigeria	To be certified
	<p><i>Time bound plan Indonesia update October 2022, Malaysia update October 2022, Africa update October 2022</i></p> <p>The revision of time bound plan because there is the change of certification time plan to 2022, 2023, and 2025 for some uncertified management units with reason is still in process to get land use right (Hak Guna Usaha) for some unit in Indonesia, pending NPP assessment for some unit in Africa, and delayed certification due to Covid-19 for some unit in Africa and Malaysia.</p> <p>Regarding the TBP more than 2023, Wilmar has communicated about the TBP to RSPO on 16 July 2021. RSPO response about the TBP is RSPO approved on August 2021 the latest TBP with some notes to take into consideration by Wilmar.</p> <p>The revision of time bound plan because two companies (PT Karya Agung Megah Utama & PT Perkebunan Anak Negeri Pasaman) has terminated the management agreement with PT AMP Plantation as stated in the termination agreement letter on 31 May 2019.</p>					
1.10.2	<p>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</p> <p>In Previous Timebound plan it's known that CH has smallholders that plan to certify such as KUD Sasak, KUD Kapar, KUD Mutiara Bosa Sikilang and KUD Permata Sawit Maligi. But in Timebound plan since March 2020 it's known that those KUD have been removed. The removing of those KUD based on consideration that the CH do not ability to control the KUD for certification that show on evidence such as:</p> <ul style="list-style-type: none"> - Statement Letter from Cooperative which state that will not doing a RSPO certification such as Letter from KUD Cooperative with No. 27/KUD-KP/IX-2016, dated September 22, 2016. - There's a internal conflict in Plasma Cooperative such as land dispute on Sikilang Cooperative and Lingkung AUR II Cooperative. 					

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA 1.4	<p>1. Moh. Arif Yusni (Lead Auditor). Indonesian citizen. Bachelor of Agriculture, majoring in Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor course in 2014, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, RSPO and ISPO Lead auditor refresher course in 2021 etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. During the audit, he verified Legality, TBP, Partial certification, environment aspect, waste management, GHG and conservation.</p> <p>2. Benli Manurung (Auditor). Bachelor of Agriculture Majoring in Soil Science. He has more than 4 years of experience as a plantation operations staff in a private oil palm plantation company in Indonesia. The trainings he has attended include: ISPO, RSPO, Lead auditor of ISO 9001: 2015; ISO 14001; 2015, IHT Health & Safety Aspect and Best Management Practice. Has participated in several audit activities since 2016 in the field of Best Management Practice, Health & Safety Aspect and Worker Welfare. During the audit, he verified Best Management Practice and OHS aspect.</p> <p>3. Rindu Galih Rezza Rachmansyah (Auditor) Indonesian citizen, Bachelor of Agriculture with major in Plant Pest and Disease. Has one year experience as Field Expert in Pesticide Company and 3 years' experience in Industrial Forest Management, Forest Rehabilitation and Reclamation on Indonesia Stated Owned Company as Assistant. Training which had attended including Lead Auditor ISO 9001, ISO 14001, ISO 17021, ISO 19011, SA 8000, Lead Auditor ISPO, Lead Auditor RSPO, RaCP & NPP Awareness and OHSAS 18001:2007. Has involved in several audit activities related to sustainable palm oil since 2017 in the aspects of Best Management Practices (BMP), social, worker welfare and OHS. During the audit, he verified worker welfare, SCCS and social aspect.</p> <p>4. Alfiary Sukmawati (Auditor Trainee). Indonesian Citizen. Bachelor of Public Health, major in Environmental Health, University of Indonesia. Has experience working in as HSE specialist for 5 years. Has attended training in AMDAL A & B, ISO 14001 auditor training, OSHAS, ISPO by LPP, Lead Auditor ISO 9001:2015, Awareness ISO 17021, Awareness ISO 17065, Awareness ISO 9001, Awareness ISO 45001, and Awareness ISO 19011. Has participated in several simulations of audit activities related to the certification system for sustainable palm oil plantations with environmental aspects. During the audit, she verified environment aspect, waste management, GHG and conservation aspect under supervised by Lead Auditor</p> <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA 1.4	<p>Number of auditors: 3 auditors and 1 auditor trainee Number of days for ASA 1.4 onsite audit: 5 days Number of working days for ASA 1.4 onsite audit: 15 working days</p>
2.2.2	Assessment Process
ASA 1.4	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT GMP Plantation to the requirements of Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.</p> <p>The scope of certification of GMP POM with FFB supplied by three (3) Estates: GMP, PHP-1 and PHP-2 Estate. The audit program is included as Appendix II. The approach to the audit was to treat the mill and its supply base as an</p>

RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

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

The opening meeting was held on 16 January 2023. As for the participants who attended the opening meeting included the Estate and Mill Managers, Support Team from Sustainability team and other staff at PT GMP. Closing meeting was held 20 January 2023 attended by the same participants as the opening meeting. Management PT GMP accept all recommendations in accordance with auditor recommendations.

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

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates through teleconference. Fieldworkers were interviewed informally in small groups in the field. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix III.

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

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

The assessment program please find Appendix 2.

2.2.3	Locations of Assessment
ASA 1.4	<p>The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>PT GMP (GMP POM)</p> <ul style="list-style-type: none"> • Reservoir. Observations and interviews related work procedure, safety aspect, environment aspect etc. • Workshop. Observation and Interview related to work procedure, OHS and workers welfare aspect.

- **Empty Bunch Area.** Field observations related to empty bunch management.
- **Hydrant Simulation.** Observation related emergency response, readiness of firefighting equipment.
- **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.
- **CPO dispatch station.** Observation and Interview related to work procedure, OHS implementation, and supply chain aspect.
- **Hazardous waste temporary storage.** Observation and Interview about storage condition, hazardous waste stock, emergency response facility, and waste management.
- **Oil storage.** Observation about storage condition, MSDS, OHS implementation, emergency facility, and material stock.
- **Chemical material storage.** Observation and Interview about storage condition, MSDS, OHS implementation, emergency facility, and material stock.
- **Sorting Station.** Observation of FFB sorting work practices according to SOPs, implementation of OHS and environmental aspects
- **Loading Ramp Station.** Observation of FFB sorting work practices according to SOPs, implementation of OHS and environmental aspects
- **Sterilizer Station.** Observation of the FFB boiling process according to SOPs, implementation of OHS and environmental aspects
- **Kernel Station.** Observation of the process according to SOPs and implementation of OHS aspects
- **Boiler Station.** Observation of boiler work process according to SOP, implementation of OHS and environmental aspects
- **Engine Room Station.** Observation of work processes in the Engine Room according to SOPs, implementation of OHS and environmental aspects
- **Water Treatment Plant.** Observations and interviews on clean water treatment, OHS and environmental aspects.
- **WWTP.** Observation and interview with worker related to POME management, work procedure, OHS, environmental and worker welfare aspect.
- **Water Intake from Batang Pasaman River.** Observation and interview with worker related water management, worker welfare, OHS, and environmental aspects.
- **Methane Capture Plant.** Observation and interview with worker related to renewable energy using, work procedure, OHS, environmental and worker welfare aspect.

PT GMP (GMP Estate)

- **HGU Pole No. 01,02,03 and BTS V.** Observation related legal boundaries and potential land dispute
- **Housing Complex Division 2.** Observation related worker facility and environmental aspects
- **Occupation Area Block 180 and Block 154,** Field observations to see potential conflicts and management of the occupation area carried out by the company.
- **Clinic.** Observation and interview about clinic facility, waste management, medical check-up, work accident, and other health facility.
- **Daycare.** Observation and interview related to work procedure, employment, and grievance mechanism.
- **Peat Monitoring and Management Activities (Subsiden Pole, Piezometer and Bund Off) at Block 17 Division I, at Block 15 Division I and Block 17 Division I.** Observations related to peat management started from observing the groundwater level and subsidence of the peat soil layer.
- **Harvest, Block 17 Division I.** Observations and interviews with workers related to the work system, employment aspects, health checks, and safe work practices.
- **EFB Application, Block 2B Division I.** Observations and interviews with workers related to the work system, employment aspects, health checks, and safe work practices.
- **Road Maintenances, Block 4 Division I.** Observations and interviews with workers related to the work system, employment aspects, health checks, and safe work practices.
- **Rats Census, Block 5AB Division I.** Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.

- **Slashing Weeds Worker** (working as the fertilizer and pesticide applicators in daily), Block 67 Division III Observation and interviews with foreman and worker, worker welfare OHS, and employment.
- **Barn Owl Box, Block 127 Division I.** Observations regarding the condition of the owl cage, the effectiveness of the owl cage for rat control.
- **Land Application at Block 28B.** Observation related procedure, employment, safety, and environmental aspect.
- **Monitoring Well at Block 148.** Observation related water management and sanitation.
- **HCV Wetland Area, Block 162.** Observation related to HCV management.
- **HCV Wetland Area, Block 175.** Observation related to HCV management.
- **HCV Batang Pasaman Riparian Area, Block 153.** Observation related riparian management and water resources.
- **Landfill Area.** Observation of domestic waste management.
- **Agrochemical Storage** Observation and interview with worker related to chemical management, OHS, and environmental aspect.
- **Firefighting Equipment Storage.** Observation and interview with worker related to hazardous waste management, OHS, and environmental aspects.
- **Sparepart and PPE Storage.** Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.
- **Fuel and Oil Storage.** Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.
- **Workshop.** Observation and Interview with workers related to OHS, environmental and workers welfare aspects.
- **Temporary Hazardous Waste Storage.** Observation for OHS, waste disposal, and environmental aspects.

PT PHP (PHP-1 Estate)

- **Loose Fruit Picker (working as the fertilizer and pesticide applicators in daily), Block 24A Division II.** Observations and interviews with workers related to the work system, employment aspects, health checks, and safe work practices.
- **Harvest, Block 15 Division II.** Observations and interviews with workers related to the work system, employment aspects, health checks, and safe work practices
- **EFB Loading Worker Block 15 F Division II.** Observations and interviews with workers related to the work system, employment aspects, health checks, and safe work practices.
- **Emplacement Area.** Observation and interview about domestic waste management, hazardous waste management, emergency facilities, and facilities provided for workers.
- **Enclave Area 463 Ha.** Observation related condition and its management.
- **Daycare.** Observation and interview related to work procedure, employment and grievance mechanism.
- **Clinic.** Observation and interview about clinic facility, waste management, medical check-up, work accident, and other health facility.
- **Rinse House.** Observation and interview related work procedure, employment, safety, and environmental aspect.
- **Chemical and Oil Storage.** Observation and interview with worker related to chemical and hazardous material management, OHS, and environmental aspect.
- **Sparepart and PPE Storage.** Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.
- **Workshop.** Observation and Interview with workers related to OHS, environmental and workers welfare aspects.
- **Temporary Hazardous Waste Storage.** Observation for OHS, waste disposal, and environmental aspects.
- **Agrochemical Storage** Observation and interview with worker related to chemical management, OHS, and environmental aspect.
- **Generator House.** Observation and interview with worker related to chemical management, OHS, and environmental aspect.
- **Firefighting Equipment Storage.** Observation and interview with worker related to hazardous waste management, OHS, and environmental aspects.
- **HGU Pole No. 14 and 34** Observation related legal boundaries and potential land dispute.

	<p>PT PHP (PHP-2 Estate)</p> <ul style="list-style-type: none"> • HGU Pole No. 32, 22, 23 and 24. Observation related legal boundaries and potential land dispute • Housing Complex. Observation related worker facility and environmental aspects • Daycare. Observation and interview related to work procedure, employment, and grievance mechanism. • Peat Monitoring and Management Activities (Subsiden Pole, Piezometer and Bund Off) at Block 14D Division II, at Block 14D Division II and Block 16B. Observations related to peat management started from observing the groundwater level and subsidence of the peat soil layer. • Harvest, Block 16CB Division II. Observations and interviews with workers related to the work system, employment aspects, health checks, and safe work practices. • Slashing weeds Worker (working as the fertilizer and pesticide applicators in daily), Block 15B Division II Observation and interviews with foreman and worker, worker welfare OHS, and employment. • Barn Owl Box, Block 121B Division II. Observations regarding the condition of the owl cage, the effectiveness of the owl cage for rat control. • Immature Area for Plant of the Year 2021, Block 121B Division II. Observations related to the management and maintenance of immature plant. • Harvest, Block 26F Division I. Observations and interviews with workers related to the work system, employment aspects, health checks, and safe work practices. • Pheromone Trap, Block 26F Division I. Pest control observation • Agrochemical Storage Observation and interview with worker related to chemical management, OHS, and environmental aspect. • Sparepart and PPE Storage. Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect. • Firefighting Equipment Storage. Observation and interview with worker related to hazardous waste management, OHS, and environmental aspects. • Rinse House. Observation and interview related work procedure, employment, safety, and environmental aspect. • Workshop. Observation and Interview with workers related to OHS, environmental and workers welfare aspects. • Temporary Hazardous Waste Storage. Observation for OHS, waste disposal, and environmental aspects. • HCV Batang Alin Riparian Area, Block 8B. Observation related riparian management and water resources. • Landfill Area. Observation of domestic waste management.
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA 1.4	<p>Summary of stakeholder consultation process Consultation of stakeholders for PT Gersindo Minang Plantation and PT Permata Hijau Pasaman was held by:</p> <ul style="list-style-type: none"> • Public Notification on MUTU Website on 02 January 2023. • Public consultation with NGOs (by email) such as WALHI, WWF, and Sawit Watch on 09 January 2023 • Public consultation meeting with government institution on 16 January 2023 • Public consultation meeting with communities on 17 and 18 January 2023 • Public consultation meeting with internal stakeholders and contractor on 17 January 2023
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (Recert 2.0) 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 Gersindo Minang Plantation POM – PT Gersindo Minang Plantation, subsidiary of Wilmar International Limited consisting of one (1) mill and three (3) oil palm estates.

During the assessment, unit management of GMP POM and its supply base already comply with RSPO P&C and SCCS requirements. Further explanation of assessment result is provided in section 3.5.

MUTUAGUNG LESTARI found that Gersindo Minang Plantation POM – PT Gersindo Minang Plantation subsidiary of Wilmar International Group complied with the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
<p>1.1.1 Certification Unit has procedure PRO-BNM-006 dated 1 September 2021, described the types of documents that can be accessed by the public according to stakeholders are included in the information list for stakeholders, such as public documents, legal document, environmental documents (environmental policy, environmental management, and monitoring report, etc.), social document, OHS policy and program, and manpower documents. These documents are available in Estate and Mill office.</p> <p>For example; periodically, unit certification sends monitoring and management documents to the related institutions such as; <i>RKL-RPL</i> document to Environment Agency, HCV and RTE species monitoring to BKSDA, and Manpower Office.</p> <p>The company has also reported several mandatory reports on environmental, manpower, legality and other aspects, for example:</p> <ul style="list-style-type: none"> • Reporting of Employment Report for PT Gersindo Minang Plantation in 2022 via online on 21 May 2022 and must be reporting back on 21 May 2023. • Reporting of Employment Report for PT Permata Hijau Pasaman in 2022 via online on 21 May 2022 and must be reporting back on 21 May 2023. <p>1.1.2 Based on document verification, all public documents (explained in 1.1.1) are accessible to relevant stakeholders by submitting an official letter of request for information. All information is provided in Bahasa.</p> <p>1.1.3 From the results of the document review on the recording of incoming and outgoing mail logs from PT PHP I and II in 2022, there were no requests for information from stakeholders. However, there are some notes regarding funds requests, routine reporting to related institutions, and invitations. While mail logs from PT GMP there is request for mill update data by Plantation Office of Pasaman Barat Regency with No. 525/459/Disbun/2022, dated June 15, 2022.</p> <p>The unit of certification has recorded and shows that responses were provided in an adequate and timely manner, responded on June 22, 2022 with No. 07/AMP-RO/BM-Ext/VI-2022 (i.e. no later than 3 months after the letter is received)</p>		

1.1.4

Procedure of Handling Information No. PRO-BNM-006 dated 01 September 2021 explained that the unit of certification has appointed person who are responsible, publicly accessible documents, the flow of handling information requests, and the maximum time limit of responding to the information request.

The respond of information requests with maximum time of 3 months since mail received. Based on verification document and interview with eksternal stakeholders, management responds the information request no longer than 7 working days. Record of the socialization regarding the procedure for PT GMP is on January 15, 2022 to 31 participants and PT PHP is on January 14, 2022 to 29 participants consisting of workers, contractors, and surrounding communities. Based on interviews with representatives of Tanjung Pangkal Village and Environmental Services of Pasaman Barat Regency, it is known that stakeholders know about the mechanism for delivering information.

1.1.5

Unit of certification has a recording of a updated stakeholder list made by the Binamitra Departement in each area PT GMP dan PT PHP I & II and explains the name of the institution/organization, address, contact number and name of the serving personnel, such as contractors, labor unions, government institutions, villages around the company, etc. The person to be contacted clearly stated in the stakeholder list. From the results of interviews via telephone with stakeholders such as, local contractor referring to the list it can be connected and direct interview with Environmental Agency of Pasaman Barat It can be proven that the information found is valid.

Status: Comply

1.2

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

1.2.1

The Certification unit had a policy concerning on the ethical codes in all operational activities and transactions. This policy stated in the Wilmar International Group Code of Conduct validated on 5 June 2019. This policy firstly explained that the principle of ethical code divided into 3 main principles, namely:

- Avoiding conflicts of interest.
- Avoiding the abuse of authority / position.
- Ensuring the confidentiality of the information and preventing the abuse of obtained information through the company operational activities, whether it's due to the personal purpose or the company's operational purpose.

In the above policy document, matters related to the code of ethics have been explained for example, the principles of the code of ethics; conflict of interest; accurate report; bribery & illegal acts or unethical trade practices; entertainment and gifts; abuse of office; insider trading; confidentiality; limitation of application; media relations; and others.

This policy covers all operational activities of PT Gersindo Minang Plantation and PT Permata Hijau Pasaman, including the prohibition of corruption, bribery and fraud in the use of funds and resources as well as compliance with reasonable business practices. Based on the results of interviews with workers (harvesters, upkeep workers and mill operators) and contractors (CV Dian RP) in the sampling units such as in the mill and estate who stated that all of them had received socialization related to the company's code of ethics which includes prohibition of corruption, bribery and fraud in the use of funds and resources and adherence to reasonable business practices in all operational areas. The workers and contractors explained that it is not permissible to take actions that violate the company's code of ethics, for example committing crimes, gambling, domestic violence, bribery and so on.

Based on the explanation above, it can be concluded that the certification unit has committed to act ethically in all business operations and transactions in accordance with the code of ethics policy that has been approved by the company.

1.2.2

The certification unit has a several methods to monitor compliance and the implementation of overall ethical business policies and practices, such as internal audit and field monitoring. Every contractor has received a socialization regarding the policy of the code of ethics given at the time of signing the works agreement stated in Article 1.3 and 1.4 which states that the unit management provider will carry out the work in accordance with the procedure and comply with all applicable codes of ethics in the company.

In addition, there is a Wilmar Whistle Blowing Policy version 5 on February 01 2018. This policy establishes the flow of complaints/reports of violations in which Wilmar Group employees, without worrying, are willing to convey the possibility of fraudulent practices occurring within the certification unit. The policy explains the reporting mechanism, namely reporting directly to superiors. If the report/complaint involves a direct supervisor, either a supervisor, Manager, or Head of Department, the report is made to the CEO, COO, Chairman of the Audit Committee, or Head of Group Human Resources. Reporting is done via email.

Based on the results of interviews with workers in the sampling units such as PHP 1 Estate, PHP 2 Estate, GMP Estate and GMP POM who stated that all of them was aware of Whistle Blowing A system that has been implemented and can be accessed by all workers, including contract workers. In addition, there are statements from third parties in collaboration with the certification unit, namely that they have been given socialization related to the code of ethics and the Whistle Blowing System before ratifying the cooperation agreement. This is done to ensure that before collaborating with the certification unit, his party does not commit a violation or can report a violation when a certification unit commits a violation during the collaboration.

During the past year there have been no reports related to violations committed by internal/external parties and this is evidenced by the results of a document review related to reporting documentation for the Whistle Blowing System via email or telephone indicated by the Group Internal Audit.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

2.1

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

2.1.1

The unit of certification can demonstrate compliance with these laws and regulations, in the following aspect

Legal and land ownership documents

The unit of certification has HGU for 5,861.40 Ha scope of certification as follow: HGU Certificate No. 1 Year 1997 for 3,600 Ha (GMP Estate), HGU Certificate No. 54 and 55 Year 2014 for 1,247 Ha (PHP-1 Estate) and HGU Certificate No. 18 Year 2005 for area 1,014.40 Ha (PHP 2 Estate). Based on information from external stakeholder and review on hectare statement of 2021/2022, there is no expansion and new planting areas issue. The scope of certification is on HGU area (5,861.40 Ha).

BMP

- Using EFB and liquid waste for recycling plant nutrients
- Harvest data collection using the E-BCC application
- Not using pesticides with active paraquat

OHS

- Have a licensed first aid worker, for example at GMP Estate, there are 6 licensed people (for example, a first aid worker license at work on behalf of Daud Sitohang with license number 02/P3K/DSTK-TRAN/2021 dated 16 December 2021 which is valid until December 2024)
- Have a lift and carry permit, for example 22 lift and carry permits at GMP Estate which are still active. For example, the lifting permit in the name of Suyadi number P.10.3485-OPK3-LT/PAA/XII/2021 dated 27 December 201 which is valid until 27 December 2026.
- Have 2 class II welders, for example a certificate in the name of Turimin number S.166/JL/PNK3/X/11

Compliance with Manpower Regulation

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

- Reporting of Employment Report for PT Gersindo Minang Plantation in 2022 via online on 21 May 2022 and must be reporting back on 21 May 2023.
- Reporting of Employment Report for PT Permata Hijau Pasaman in 2022 via online on 21 May 2022 and must be reporting back on 21 May 2023.
- The implementation of the minimum wage in 2022 is in accordance with the Minimum Wage Decree that has been the established by the Governor of Sumatera Barat in 19 November 2021.

- Payment of overtime wages to workers in accordance with Government Regulation No. 35 of 2021.
- Implementation of the wage, structure and scale of wages for all levels of workers in accordance with Government Regulation No. 36 of 2021.

Environmental Aspects**PT GMP:**

- The Company already has Environmental documents in the form of an Environmental Impact Analysis Addendum (ANDAL), Environmental Management Plan (RKL) and Environmental Monitoring Plan (RPL) for 2014 for the scope of oil palm plantations covering an area of 6000 Ha consisting of 3600 Ha own Estate and 2400 Ha Plasma Estate, as well as a Palm Oil Processing Factory with a capacity of 60 Tons FFB/Hour. The addendum was made because of the initiation for the construction of a new boiler with a capacity of 30 tons, a turbine with a capacity of 1600 kw and methane capture.
- The company already has a Certificate of Environmental Feasibility for ANDAL, RKL and RPL Documents for PT GMP's Oil Palm Plantation and Processing Mill activities based on the decision of the Pasaman Barat Regent Number 188.45/1079/BUP-PASBAR/2014 which was ratified on 8 December 2014.
- The company already has an Environmental Permit based on the Decree of the Regent of Pasaman Barat No. 188.45/1080/BUP-PASBAR/2014 concerning Environmental Permits for PT GMP's Palm Oil Plantation and Processing Mill activities in Pasaman Barat District which was ratified on 8 December 2014.
- The company has a temporary storage permit for hazardous and toxic waste based on the Hazardous and Toxic Waste Management Permit for the storage of PT Gersindo Minang Plantation Hazardous and Toxic Waste from the Investment and One Stop Service Office of Pasaman Barat District with number 503/02/ IPLB3/DPMPPTSP/VII-2020 on July 30, 2020 which is valid for 5 years from the date of stipulation.
- The company already has a Land Application Permit based on the Decree of the Head of DPMPPTSP Pasaman Barat District Number 503/02/LA/DPMPPTSP/XII-2019 concerning Permit for Utilization of Palm Oil Industrial Wastewater on Soil at PT GMP's Palm Oil Plantation which was ratified on December 3, 2019 with validity period of 5 years from the date of stipulation.
- The company already has a Water Resources Concession Permit based on the Decree of the Governor of Sumatra Barat Number 570/1119-periz/DPM&PTSP/BI/2021 for the scope of PT GMP which was ratified on 8 June 2021 with a water intake quota of 65,000 m³/month. The permit replaces the previous permit issued in 2016 with a validity period of 10 years with a permitted capacity of 35,501 m³/month. The results of the verification of the water utilization recapitulation document for the 2021 period show that the company has utilized water that is still below the permitted quota, with an average of 53,791.33 m³/month. Based on this, the company has responded and improved the Opportunity of Improvement (OFI) given during the surveillance 1.2 remote audit stage related to the use of surface water that exceeds the quota of the permit it has by renewing the permit.

PT PHP:

- The company has UKL-UPL in 2004, for the scope of PT PHP's oil palm plantation in Pasaman District, Sumatera Barat Province. The scope of the document review is oil palm plantations covering an area of 4,170 Ha and 1200 Ha of which are plasma plantations. The document received a recommendation based on the official report Number 007/06/PLH/2004 on February 11, 2004 and there was a reduction in the scope of management to 3,800 hectares.
- The 2004 UKL-UPL document was approved by the Regent of Pasaman with documentary evidence No. 008/06/PLH/2004 on February 18, 2004 for the scope of PT PHP's oil palm plantation in Pasaman District, Sumatera Barat Province covering an area of 3,800 Ha.
- The company already has the Decree of the Regent of Pasaman Barat No. 188.45/236/BUP-PASBAR/2018 April 25, 2018 concerning Permit for Temporary Storage of Hazardous and Toxic Waste for the scope of the PHP-1 Estate Unit which is valid for 5 years.
- The company already has the Decree of the Regent of Pasaman Barat No. 188.45/632/BUP-PASBAR/2017 dated 13 October 2017 concerning Permit for Temporary Storage of Hazardous and Toxic Waste for the scope of the PHP-2 Estate Unit which is valid for 5 years.

2.1.2

The company has a documented system to ensure legal compliance contained in the SOP document Identification and Evaluation of Legal Aspects and Applicable Regulations Number PRO-BNM-005 Revision 02 dated 1 September 2021 The procedure explains personnel who have a responsibility to update the regulation and law, identify and inventory, evaluation, and monitor Information of regulations from national, provincial, and district regulatory bodies and renewal any changes to prevailing laws and regulations, and monitoring of expired regulations/licenses.

the results of document verification, the company can show a list of laws and regulations which explains the aspects, laws, and clauses of these regulations. The list of regulations divided into plantation aspect, worker welfare, OHS Aspect and environmental aspect. Based on documents verifications it was known the last update was carried out on 22 December 2022. the last update explained that Law No. 11 the year 2020 regarding Job Creation was replaced with Government Regulation in Lieu of Law No. 22 the year of 2022 regarding Job Creation

The company also has personnel responsible for identifying legal requirements and ensuring compliance. Companies can also show a complete list of international, national, sub-national, and provincial laws that detail specific requirements for mill and plantation operations for each aspect such as employment, environment, legality, and Best Management Practices. All relevant sections of the law have been identified and linked to activities within the unit of certification. The company carries out an internal RSPO audit regularly every year with the last internal audit carried out on 19 July 2022, at which time the audit is carried out in conjunction with inspections related to compliance with the relevant regulations. In relation to third-party contracts, the certification unit has also ensured that there is an evaluation of legal compliance for all contracts with third parties carried out according to the principle of continuous improvement. This can be proven from the evidence of socialization to contractors as well as the application of standards and procedures for third parties who enter the scope of the company's area.

2.1.3

The company has procedures related to the maintenance of boundary pole contained in the SOP for the Maintenance of HGU pole No. PRO-BNM-012 3rd revision on October 2, 2021. Based on the SOP, boundary maintenance is carried out every three months by a PIC appointed by the company. Last monitoring and maintenance boundaries poles are done by the company in accordance with company procedure, i.e. on last monitoring was done in November 2022 and December 2022, for Pt GMP and PT PHP respectively.

Based on documents verifications and interview with managements there is no changes regarding map and the numbers of boundaries poles.

- PT GMP : boundaries poles distribution maps with scale 1;40,000 with the numbers of poles are 41 boundaries poles
- PT PHP 2 : boundaries poles distribution maps with scale 1;40,000 with the numbers of poles are 29 boundaries poles
- PT PHP 1 : boundaries poles distribution maps with scale 1;35,000 with the numbers of poles are 46 boundaries poles

Based on observation to in poles sample (GEMP Estate PolesNo. 01,02,03 and BTS V; PHP 2 Estate Poles No. 32, 22, 23 and 24, and PHP 1 Estate Poles No 14 and 34, it was known that BPN poles were satisfactory maintained and easy to identified. Furthermore, coordinate marked by Auditor through application GPS-Map were match with coordinate settled by BPN

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

In monitoring the use of third parties (contractors, FFB suppliers and transporters) for plantation and mill activities, the certification unit has well documented the list of third parties, the number of workers they have, contact persons, work agreements, and ensuring other matters related to compliance with laws and regulations in Indonesia. At present the certification unit has:

- PT Gersindo Minang Plantation
Certification unit have 11 third parties (Contractor, Health Laboratory, Hazardous Waste Transport, Testing Company and any others) and 4 FFB Suppliers that has been cooperate with certification unit.
- PT Permata Hijau Pasaman
Certification unit have 11 third parties (Contractor, Health Laboratory, Hazardous Waste Transport, Testing Company and any others) that has been cooperate with certification unit.

These contractors above are collaborating in the activities of civil activities such as construction of housing and infrastructure.

In managing the contractor, the certification unit has a copy of the cooperation agreement in each unit. For example, for agreement between two parties such as:

- Letter of Agreement No. 049/SPK/GMP/12/2022 dated 05 December 2022 with CV Dian RP for the Empty Bunch Transport, in which it explains the type of work/specifications, the validity period of the agreement, the rights/obligations of the parties,

compliance with regulations and so on.

- Letter of Agreement No. 036/SPK/GMP/X/2022 dated 03 October 2022 with CV Harapan Jaya for the Warehouse Construction, in which it explains the type of work/specifications, the validity period of the agreement, the rights/obligations of the parties, compliance with regulations and so on.
- Letter of Agreement No. 017/SPK/SPIN-PROJECT GMP/X/22 dated 06 October 2022 with CV Putra Ruslan for the Unloading Screw Bottom Cross Nut Conveyor, in which it explains the type of work/specifications, the validity period of the agreement, the rights/obligations of the parties, compliance with regulations and so on.

At the time the audit was carried out, certification unit have third parties list document shown was in accordance with the actual, such as the contact number of each stakeholder contacted by the auditor as stated in the list. The explanation above can be concluded that the certification unit has managed and documented the list of contractors along with supporting documents.

2.2.2

In each work agreement between the certification unit and the third parties, there are several separate clauses related to fulfilling legal obligations in force in Indonesia as one of the obligations that must be fulfilled by the third parties. Some of these obligations are related to:

- Article 1.3 regarding Compliance with regulations and ethical codes that apply in the company
- Article 1.4 regarding compliance with licensing from the competent authority in accordance with applicable laws and regulations, as well as guarantees that there will be no child labor, forced labor or the results of human trafficking.
- Article 8.6.1 regarding compliance with labor regulations including providing health insurance, work safety insurance and/or labor social security (jamsostek) to each employee.
- Article 8.6.2 concerning occupational safety and health (OHS) including the obligation to use PPE
- Article 8.6.3 regarding the obligation to preserve the environment

To ensure compliance above with these clauses, the certification unit always requests the requirements for the completeness before the contractor does / starts work. The results interviews with contractor (CV Dian RP) revealed that workers had received wages accordance with the minimum wage, were registered in the *BPJS* program, have a legality document, and the worker have been given the standard PPE. This result is in line with the results of the document review which proves that the wages of contractor workers are above the minimum wage, fulfilling tax payments, *BPJS*, standard PPE and other requirements. For example, fulfillment includes:

- Proof of *BPJS Ketenagakerjaan* payment for CV Dian RP for the period of November 2022 – October 2023 on 04 January 2023.
- Proof of *BPJS Ketenagakerjaan* payment for CV Harapan Jaya for the period of Januari – December 2023 on 04 January 2023.
- Proof of *BPJS Ketenagakerjaan* payment for CV Putra Ruslan for the period of 06 October 2022 – 19 February 2023 on 21 October 2022.
- Proof of payment of wages for 2 builders (FSL & TIO) of CV Dian RP for the period of 12-18 January 2023 that has been paid on 19 January 2023 (the wages paid are in accordance with the stipulated minimum wage).
- Proof of payment of wages for 2 drivers (AFD & KNT) of CV Harapan Jaya for the period of December 2022 that has been paid on 09 January 2023 (the wages paid are in accordance with the stipulated minimum wage).
- Proof of payment of wages for 2 mechanics (RNI & EKO) of CV Putra Ruslan for the period of 09 November 2022 that has been paid on the same day (the wages paid are in accordance with the stipulated minimum wage).
- Evidence that there are no workers under the age of 18 for CV Dian RP, CV Harapan Jaya and CV Putra Ruslan, where the youngest worker currently working is 28 years old.
- Evidence of compliance with PPE for CV Dian RP, CV Harapan Jaya and CV Putra Ruslan workers by OHS inspection carried out by supervisors to ensure contractor workers have used the appropriate PPE and others OHS aspect when working in December 2022.

In addition, the certification unit can show evidence in the form of monitoring the legal compliance of third parties that work with them every year using Form No. FRM-GEN-028 updated monitoring was carried out on 02 January 2023 and the monitoring will be updated again on January 2024. Unit certification shows third party legal compliance monitoring for CV Dian RP, CV Harapan Jaya and CV Putra Ruslan where the monitoring has listed a law register (12 regulation) that must be fulfilled by a third party.

Of all the regulations mentioned above, CV Dian RP, CV Harapan Jaya and CV Putra Ruslan have complied with all of these regulations in 2022 which were evaluated on January 2023. The certification unit has proven that all contracts have their own clauses

regarding the fulfillment of applicable legal obligations, and are shown by the relevant third party.

2.2.3

In each work agreement between the certification unit and the contractor, there are clauses related to fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the contractor (article 1.4). Some of these obligations are related to disallowing child, forced and trafficked labor to be employed by the third party (contractors), and where young workers are employed, the contracts include a clause for their protection. To ensure compliance with these clauses, the certification unit always requests the requirements for the completeness before the contractor does / starts work.

The results of the document review of the list of contractor workers revealed that there were no workers under the age of 18 and the work provided was in accordance with the agreement when the initial worker worked. This is in line with the results of interviews with contractors (CV Dian RP, CV Harapan Jaya and CV Putra Ruslan) stating that no child laborers have worked up until now, there are no forced laborers / workers resulting from trafficking because all workers have understood the work agreement at the start of work and payment for the work is always equal.

The certification unit has proven that all contracts have clauses disallowing child, forced and trafficked labor to be employed by the third party, and where young workers are employed, the contracts include a clause for their protection.

Status: Comply

2.3

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

2.3.1

Based on documents verifications and field visits to the weighbridge station All entire FFB accepted in GMP POM originally from its own estate under the scope of certifications, other estates under the subsidiary of Wilmar International Ltd that have obtained RSPO Certificate and area that not been RSPO Certified. Detail all FFB that accepted in GMP mill are:

- a. Estate under scope of certifications
 - GMP Estate
 - PHP 1 Estate
 - PHP 2 Estates
- b. Estate estates under the subsidiary of Wilmar International Ltd
 - AMP 4 Esatte
- c. Uncertied area in PT PHP 2

2.3.2

Based on documents verifications, interview with managements as well as interview with FFB Suppliers it was known currently there are six middlemen / FFB Agent / Collectors that delivered FFB to Mill. As part of efforts to trace the supply of FFB from external parties, especially indirect suppliers, the company has conducted a traceability audit to ensure that the FFB supplied comes from legal sources. During the audit process, evidence of legal compliance from each supplier can be shown, in example FFB suppliers on behalf of Maiwarman, the unit audit can presented information regarding informations of traceability of FFB as follows:

- Numbers of Suppliers : 4 subagents with numbers of suppliers 20 farmers
- Sample of Geolocation of FFB origints : 099.80457 E and 00.15556 E
- Address: Sub District of Padang Tujung, District of Pasaman Barat, Province of Sumatera Barat as well as map of FFB origins
- Sample of Land Ownership Documents : Freehold title No. 405 dated 29 June 1985

Status: Comply

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

3.1

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

3.1.1

Based on the verification of basic info and interviews with management representatives it is known that the certification unit shows a long-term planning document that is described in a 5 (five) year plan, which is listed in the PT Permata Hijau Pasaman and Gersindo Minang Plantation Projections Periods 2023 – 2028 document. The document contains crop estimates, CPO production, cost

projections, and infrastructure development. For example, GMP Estat for the 2024 plan, there is no replanting plan, the projected FFB production is 77,600 tons. During bussines plan also informed regarding projections of CSPO and CSPK Prices

3.1.2

The company also shows the replanting planning documents for the 2023-2028 period for GMP and PHP units as follows:

<i>Replanting Year</i>	GMP (Ha)	PHP (Ha)
2023	-	673
2024	-	165
2025	-	387
2026	-	330
2027	-	-
2028	-	-

PT PHP showed documents of a replanting plan operational area of 673 ha in 2023. However, until now it has not been realized because of the social conflict with Customart land of Kapar Area which is currently still in the stage of being resolved at the Supreme Court. In addition, PT GMP not yet have a replanting program because the year of palm oil planted is 2014 – 2021 with the oldest palm oil is 9 years old.

3.1.3

The representative of the certificate holder explained that the evaluation related to the Business Plan had been carried out. He showed the Management Review Meeting document which was held in January 2023. The document discusses the effectiveness and results of internal audits of management system. In addition, the certification unit also shows internal audit documents for ISPO, RSPO, SMK3 and ISCC which were carried out on July 19, 2022 by the certification unit's internal auditors. From the audit results, it is known that there are several findings, for example the finding of the condition of sirens at GMP Temporary Hazardous Warehouse non-functioning which has been followed up on July 21, 2022.

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 representative of the certificate holder explained that the evaluation related to the Business Plan had been carried out. He showed the Management Review Meeting document which was held in January 2023. The document discusses the effectiveness and results of internal audits of management system. In addition, the certification unit also shows internal audit documents for ISPO, RSPO, SMK3 and ISCC which were carried out on July 19, 2022 by the certification unit's internal auditors. From the audit results, it is known that there are several findings, for example the finding of the condition of sirens at GMP Temporary Hazardous Warehouse non-functioning which has been followed up on July 21, 2022

BMP

- Using EFB and liquid waste for recycling plant nutrients
- Harvest data collection using the E-BCC application
- Not using pesticides with active paraquat

OHS

- Have a licensed first aid worker, for example at GMP Estate, there are 6 licensed people (for example, a first aid worker license at work on behalf of Daud Sitohang with license number 02/P3K/DSTK-TRAN/2021 dated 16 December 2021 which is valid until December 2024)
- Have a lift and carry permit, for example 22 lift and carry permits at GMP Estate which are still active. For example, the lifting permit in the name of Suyadi number P.10.3485-OPK3-LT/PAA/XII/2021 dated 27 December 201 which is valid until 27 December 2026.
- Have 2 class II welders, for example a certificate in the name of Turimin number S.166/JL/PNK3/X/11

3.2.2

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

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The certification unit already has operational procedures consisting of SOPs for Agronomy and Palm Oil Processing. The agronomy procedures regulate, among others, planting oil palm, fertilizing, weed control, water management, harvesting, pest control, replanting, preventing fires in the land, PPE standards, pesticide management, and soil and water conservation. In the procedures for processing palm oil, among others, regulate the reception of FFB, supply chain, boiling (sterilization), stripping, digestion, pressing, clarification, separation of seeds and fibers, core station, oil and palm kernel stockpiling, laboratory management, boilers, engine power, factory machine type, safety. and occupational safety, shipping, PPE standards, management of spills and spills, Lock Out and Tag Out, investigation of work incidents and accidents, and granting of work permits.

3.3.2

The certification unit has a mechanism for examining the implementation of the procedures, which are contained in the PRO-GEN-003 procedure regarding the Internal Audit Management System Revision 03 Procedure which was ratified by the General Estate Manager on September 1, 2021. In this procedure, it is about the implementation, reporting, and documentation of the results of the Internal Audit.

In Additions, the certification unit also shows internal audit documents for ISPO, RSPO, SMK3 and ISCC which were carried out on July 19, 2022 by the certification unit's internal auditors. From the audit results, it is known that there are several findings, for example the finding of the condition of sirens at GMP Temporary Hazardous Warehouse non-functioning which has been followed up on July 21, 2022

3.3.3

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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

The certification unit has several documents related to social and environmental impact assessments which are carried out independently and in a participatory manner, involving affected stakeholders. The document covers the pre-construction activities, the operation stage, and the post-operation stage. The unit of certification does not carry out new plantings or increase the scope of certification. Some of the documents held by the certification unit, include:

Environmental Impact Assessment (EIA)

PT Gersindo Minang Plantation Unit (Estate and POM)

- The company has conducted several environmental studies, starting in 2003 in the form of a UKL-UPL document, then an

addendum was made to the Environmental Management and Monitoring Document (DPPL) in 2009 as a fulfillment of the Minister of Environment Regulation No. 12 of 2007 and the Sumatera Barat Governor's Regulation. Number 2 of 2008. Then, the company again made an addendum to environmental documents in the form of an Environmental Impact Analysis Addendum (ANDAL), an Environmental Management Plan (RKL) and an Environmental Monitoring Plan (RPL) in 2014. The addendum was made because of the initiation for the construction of a new boiler with capacity of 30 tons, turbine with a capacity of 1600 kw and methane capture. From all these environmental documents, the scope of the study did not change, namely with an oil palm plantation of 6000 Ha consisting of 3600 Ha of own Estate and 2400 Ha of Plasma Estate, as well as a Palm Oil Processing Factory with a capacity of 60 Ton FFB/hour.

- Based on the 2014 environmental documents, the company obtained a Certificate of Environmental Feasibility for ANDAL, RKL and RPL Documents for PT GMP's Plantation and Palm Oil Processing Mill activities based on the Decree of the Regent of Pasaman Barat Number 188.45/1079/BUP-PASBAR/2014 which was ratified on 8 December 2014.
- The company also has an Environmental Permit based on the Decree of the Regent of Pasaman Barat No. 188.45/1080/BUP-PASBAR/2014 concerning Environmental Permits for PT GMP's Palm Oil Plantation and Processing Mill activities in Pasaman Barat District which was ratified on 8 December 2014.

PT Permata Hijau Pasaman Unit (PHP 1 and PHP 2 Estate)

- The company already has an Environmental Document in the form of an Environmental Management Effort and Environmental Monitoring Effort Document (UKL-UPL) in 2004, for the oil palm plantation of PT Permata Hijau Pasaman (PT PHP) in Pasaman District, Sumatera Barat Province. The scope of the document review is an oil palm plantation covering an area of 4,170 Ha which is divided into PHP 1 with an area of 2770 Ha, PHP 2 with an area of 1400 Ha and 1200 Ha of which are plasma plantations. The document has complied with the recommendations given by the Controlling Team for the Implementation of Environmental Management Documents, based on the official report Number 007/06/PLH/2004 dated February 11, 2004. Based on the recommendation, the management area was reduced to 3,800 hectares.
- Based on the UKL-UPL document and the recommendation letter above, the company obtained a Letter of Approval of Environmental Management Documents issued by the Regent of Pasaman No. 008/06/PLH/2004 on February 18, 2004 for the scope of the oil palm plantation of PT Permata Hijau Pasaman (PT PHP) in Pasaman District, Sumatera Barat Province covering an area of 3,800 Ha. This ratification letter is valid as long as it can implement all the provisions contained in the UKL/UPL document and fulfill the recommendations given by the Environmental Management Document Implementation Control Team.

In all of the documents mentioned above, each aspect and parameter must be monitored and managed with clear target information and implementation time contained in the UKL-UPL matrix. The company has 2 units that are included in the scope of certification with 2 environmental documents, so the company has the obligation to prepare 2 environmental management and monitoring reports (RKL-RPL) every semester.

Identification of High Conservation Values (HCV) at PT GMP PHP has been conducted on 2012 by RSPO approved assessor, using HCV identification guidelines in Indonesia 2008, and public consultations during HCV assessment was done on 25 September – 4 October 2012.. Identification results indicates the presence of HCV 4.1 (catchment areas) with a total of **57.96 Ha**, consist of PT GMP with a total area of 54.63 Ha and PHP which is 1.92 Ha is only located in PHP-2. This HCV identifications also found Rare, Threatened or Endangered (RTE) species according IUCN- Redlist such as *Pelargopsis capensis*, *Spilornis cheela*, *Heliatus leucogaster*, *Lepototilos javanicus*, *Cairina sctulata*, *Tarsius spp*, etc. All of indicates HCV areas was mapped by 1:30000 scale and this HCV identifications covered all operational areas including surrounding landscape.

Social Impact Assessment (SIA)

Certification unit already conducted a Social Impact Assessment (SIA), carried out in 2012 by AKSENTA Consultants. The SIA study is divided into 2 documents because there are 2 scopes of activities, namely for PT GMP which was carried out on 25 – 30 September 2012 which included GMP Estate and GMP POM, and 30 September – 4 October 2012 which included PHP 1 and PHP 2 Estate. This study explains the impacts arising from plasma activities, including: employment, natural resources, public health, economic development, physical development, population migration, and work safety. Social impact assessment is included as part of Complementary to all environmental impact assessments. The assessment involved all parties affected by both internal and external stakeholders, including employees, workers union, village heads around the plantations, local NGOs and smallholder (KSU Mutiara Bosa Sikilang, KUD Kapa, KUD Rantau Pasaman, etc.). Participatory evidence with affected parties is shown in the form of attendance at FGD meetings and photos during interviews. In addition, the SIA assessment has also been disseminated to villagers and stakeholders in the affected area with evidence of an invitation to Socialization conducted on 20 February 2013, as well as minutes

of socialization of HCV Identification Results, Traditional Activities, Programs and Social Impact Procedures / SOPs related to company activities on February 22, 2013 which was attended by parties from around the plantation area.

Community representatives who became resource persons in this assessment were the village head, village apparatus, traditional leaders (*Ninik Mamak*), and farmers/fishermen/laborers. The types of data collected were primary and secondary data. Primary data collection for monitoring social impact management was obtained from informants as the affected party as well as local village officials who represented the community and as verifiers. The secondary data or indirect data collection is in the form of evidence, notes, archives or published historical reports as well as references in the form of AMDAL, HCV documents, local government literature, notes on CSR implementation and others. The aspects of the assessment are Economic Life (Natural Potential, Livelihoods, Local Economy, Food Security, Vulnerable Groups, Company Contribution, Plasma Plantation Development) and Social and Cultural aspect. Meanwhile, another secondary data is obtained indirectly through intermediary media in the form of published evidence, records, archives, or historical reports through literature studies. Secondary data is obtained from related units in order to document impact management as well as additional data from relevant affected parties. The reading material used is documentation of the implementation of impact management, internal company data, correspondence between the company and affected parties, and so on.

Negative and positive issues were summarized during the assessment included management recommendations. The data collection process was carried out by involving the community and workers as sources of information using interviews, focus group discussions and distributing questionnaires in the village. In the report, there is also a matrix on the Social Management Plan and Social Monitoring Plan and an Attachment to the Attendance List of participants in the data collection process in surrounding villages and within the scope of PT GMP and PHP employees.

3.4.2

The company already has an environmental and social management and monitoring plan which has been developed with the participation of affected stakeholders, there are:

Environmental Impact Assessment (EIA)

Based on the results of document verification, it can be concluded that all management and monitoring parameters requested in environmental documents have been implemented. Certification unit has also evaluated for each significant impact monitoring parameter that is implemented as required in KepmenLH 45 of 2005, which includes an evaluation of trends, evaluation of critical levels, and evaluation of compliance. Based on the results of the evaluation, it is known that all parameters are still appropriate by the related Quality Standards, and there is no indication of contamination.

The implementation of environmental management has been carried out in accordance with all RKL-RPL documents and Environmental Permits owned by the company. The certification unit makes RKL-RPL reports based on attachment of Environmental Permit where the matrix is a compilation of all previously owned. The environmental management and monitoring matrix describes the impact of plantation activities and mill operations, also explains the evaluation of the trend level, critical level evaluation and evaluation of compliance with the results of management and monitoring plan contained in the EIA document (has been explained in 3.4.1) that have been carried out based on each *RKL RPL* matrix assessment.

Based on the document review, it is known that the scope of the study on environmental impact assessment has covered the entire company area and has covered all activities for environmental management and monitoring. For example; the results of surface water tests on the banks of the Batang Pasaman River and Batang Alin River confluence of the BOD and COD parameter values exceed the quality standard used, namely PP number 22 of 2021 class 2.

The environmental management report is carried out every 6 months and submitted to the relevant agency, for example can be proof with;

- Receipt of reporting document Report on Environmental Monitoring and Management PT GMP Semester II of 2022 Number 07/GMPP/II/2023 which was reported to DLH Pasaman Barat Regency on January 12, 2023.
- Receipt of reporting document Report on Environmental Monitoring and Management PT PHP Semester II of 2022 Number 038/PHP-EST/EXT/II/2023 which was reported to DLH Pasaman Barat Regency on January 13, 2023.

Social Impact Assessment (SIA)

Unit of certification already has a social impact management and monitoring plan for the 2022 for PT Gersindo Minang Plantation and PT Permata Hijau Pasman, that has been developed with affected stakeholders through FGDs and based on the results of the previous SIA management and monitoring review conducted on 2022. The stakeholders involved can be proven through examples minutes of socialization of SIA implementation, review and evaluation for 2009 to 2021 as well as implementation of CSR 2021, and implementation of PT GMP MP SIA and CSR 2022 – 2024 which was held on 15 January 2022 which was attended by 31 people, examples from; representatives of the Aia Gadang community, Jorong Village, Wali Nagari, youth representative from Tanjung Pangkal.

Unit Certification has managed social impacts several potential negative impacts identified from the results of the previous review, including;

- Land that cannot be controlled is 1.64 Ha
- Employees do not understand the career path in the company
- Employees do not understand the wage system, especially harvesting employees
- Erosion occurred at the riverbank block 53
- Transfer of riparian status to HCV area
- Smelly buildup of EFB
- Complaints about clinic services; use of ambulances, BPJS, etc
- Demanding job opportunities
- Occurrence of work accidents
- etc

As a follow-up to the 2022 SIA Social Impact Review and Update, the company has developed a social management and monitoring plan that is developed as outlined in the Social Management and Monitoring Plan document. Involvement in the document preparation process is known to have involved external and internal stakeholders.

Furthermore, the results of document reviews and interviews with management and stakeholders (internal and external) found that the company had managed issues that could have a social impact which were carried out partially by the relevant departments but were not explained in detail in the SIA review report, for example

- Attention to social dynamics in the environment of indigenous peoples / customary owners who can have a direct or indirect impact on the company's operational activities
- Attention related to the dynamics in the aspect of employment such as the existence of workers' organizations and industrial relations
- Issues related to dissatisfaction with tali asih or social assistance

Based on the explanation above, companies are encouraged to develop a comprehensive social monitoring and management plan by integrating between sections/departments that cover all impacts and represent a sample of affected parties. (OFI)

3.4.3

Environmental Impact Assessment

The company has documents, the implementation of the results of the environmental permit including reports to agencies in the form of RKL-RPL documents which are conducted every semester and reported to related agency (explain in indicator 3.4.2). The effectiveness of environmental management and monitoring can be seen from the results of environmental management and monitoring analysis, which can also be seen from the suitability between the management and monitoring plans and their implementation in the field. The RKL-RPL document also shows that the company has managed all the critical impacts recommended in Environmental permits. Include impact analysis by trend evaluation, critical level evaluation and compliance evaluation.

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

From the documents review related to environmental monitoring in the RKL-RPL document for the semester II of 2022, it is known that there are several measurement results that exceed the environmental quality standards. The certification unit has managed each of these parameters. Even though, the unit of certification has made several efforts to maintain its quality, such as;

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

Social Impact Assessment (SIA)

Regarding the social management and monitoring plan owned by the company, it has conducted a review and monitoring once every year. Furthermore, the results of document reviews and interviews with management and stakeholders (internal and external) found that the company had managed issues that could have a social impact which were carried out partially by the relevant departments but were not explained in detail in the SIA review report.

The stakeholders involved can be proven through examples minutes of socialization of SIA implementation, review and evaluation for 2009 to 2021 as well as implementation of CSR 2021, and implementation of PT GMP MP SIA and CSR 2022 – 2024 which was held on 15 January 2022 which was attended by 31 people, examples from; representatives of the Aia Gadang community, Jorong Village, Wali Nagari, youth representative from Tanjung Pangkal.

Based on the explanation above, companies are encouraged to develop a comprehensive social monitoring and management plan by integrating between sections/departments that cover all impacts and represent a sample of affected parties.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1

The certification unit has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Collective Labor Agreement period 2021-2023 written in Bahasa. In general, these procedures describe:

- Recruitment of workers is based on needs and adjusted to the ability of the company.
- The age of the prospective worker is a minimum of 18 years at the time of recruitment of workers.
- Recruitment of workers is based on the ability, expertise and assessment of prospective workers.
- The company is authorized to carry out the placement, transfer and promotion of workers in accordance with applicable regulations.
- Termination of employment can occur when a worker retires, dies, resigns, and terminates an employment agreement due to a serious violation and others.

In addition to being publicly listed in Collective Labor Agreement, the certification unit has other procedures in the form of Policies, SOP, Internal Memorandums and others related to recruitment, transfer, promotion, retirement, termination of employment and others. These procedures have been documented to all workers and their representatives. One of the socializations given to workers was related to Collective Labor Agreement and Regulations in 20 October 2022 which was attended by all workers on muster morning.

For example, some procedures that are owned by the company include:

- SOP Recruitment (PRO-HRD-001) concerning Employee Recruitment
- Policy No. 039/DIR-KP/IX/2015 concerning Employee Pension
- SOP Promotion (SOP-PD-01) concerning Employee Promotion
- SOP Worker Assessment (PRO-HRD-003) concerning Worker Assessment

The certification unit did not have workers with contract status for daily worker (BHL) or contract worker (PKWT), the current employee status is permanent workers who have Orientation Worker status (3-month orientation period), such as Daily Regular Workers, Monthly Permanent Workers and Staff. All the rights for each employment status have been distinguished. Based on the results of interviews with workers in the estate and mill units and representatives of the worker union, it is known that the workers have understood the recruitment, selection, promotion and other employment procedures contained in the Collective Labor Agreement and

in other procedures.

1997

From this explanation it can be concluded that the certification unit has procedures for recruitment, selection, employment, promotion, retirement and termination of employment must be documented / available to workers and their representatives in accordance with applicable laws and regulations.

3.5.2

The certification unit always documented all labor procedures that have been carried out properly such as recruitment, promotion, performance assessment, pension and others. The following are some sample labor procedures that have been implemented and are well documented by certification unit, including:

- The certification unit has a worker recruitment document from the start the worker becomes a permanent worker in probation period. For example, a security (RSK) who has recruitment documents such as a job application letter, identity card, family card, recruitment selection results, decree letter accepted to work and undergo probation for 3 months, medical check-up results and others. The worker started working as a probation worker on 14 November 2022 until 14 February 2023 (Employment Agreement No. 005/SPK-PGA/Int/XI/2022 in 10 November 2022).
- The certification unit has a worker promotion document from the start (probation) until the worker becomes a permanent worker. For example, a loading worker (TMJ) who has recruitment documents such as a job application letter, identity card, family card, recruitment selection results, decree letter accepted to work and undergo probation for 3 months, medical check-up results and others. The worker started working as a probation worker on 01 April 2022 and in 01 July 2022 the worker received a performance appraisal with a "B" result (passed) and was promoted to permanent employment (class 2A) in accordance with Decree No. 87/SK-POU-GMP/VII/2022 on 01 July 2022.
- The certification unit has a worker leveling in grade since worker becomes a permanent worker. For example, a process operator (JMR) who has received a performance appraisal in 2021 with a "B" result so that he is declared eligible to get a grade level increase from 2C to 2D in accordance with Decree 32/GMP-HRR/SK-1/2022 dated 25 December 2021 which Valid from 01 January 2022.
- There is a pension document for driver workers with initial SPT retired on 23 April 2022 according to Decree No. 172/SK-PGA-GMPPOM/Int-IV/2022 dated 08 April 2022. In addition to the decree, there are also other supporting documents such as calculation of pension payments, labor documents of workers since they first worked, etc. All procedures and documents shown are in accordance with existing procedures and in accordance with applicable laws.

The results of interviews with workers (harvesting, spraying and mill operators) in GMP POM, GMP Estate, PHP 1 Estate, and PHP 2 Estate, explain that the certification unit has carried out labor procedures starting from recruitment, selection, acceptance, promotion and retirement procedures in accordance with existing regulations, as well as all. The application is assessed in accordance with the abilities and competencies of the employees. For example, workers who initially entered were selected before being accepted, workers who received promotion / class promotion had received an assessment from their superiors and workers who retired received all their rights as retirees. During 2022 there were no recruitment issues that occurred at certification unit, this was strengthened by the results of consultations with the workers union, the Manpower Agency of Pasaman Barat Regency which stated that the application of existing labor procedures certification unit is in accordance with the regulations and since 2022 until now there have been no recruitment issues.

Based on the description above, it can be concluded that the certification unit already has labor procedures implemented and records are maintained for each worker.

	Status: Comply
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3.6

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

3.6.1

The Company already has Risk Management documents prepared by the P2K3 Secretary for GMP and PHP. The document describes the risk assessment and its controls for all operational areas of the company which was revised as of April 2022.

Based on field observation, hazard identification risk assessment and control (HIRAC) documents has been implemented adequately and appropriate in Estate and Mill. For examples: operator uses ear muff, harvester uses helmet, etc

The company has carried out an evaluation or investigation of all work accidents that occurred, for example a work accident at the loading ramp on April 7 2022 which was investigated on the same day as the cause of the accident was because workers were not careful in hooking up the Hook Sling so that it got stuck and had evaluated by carrying out repairs by replacing new Hook Slings, repairing capstans and conducting OHS socialization.

The results of the field visit in the POM area found that there is a reservoir/reservoir as a water reservoir for POM operations. In the vicinity of this area, there have been several warnings of potential hazards and prohibitions that must be obeyed. In addition, the measurement results show that the distance between the reservoir and the nearest housing is about 150 meters and it is surrounded by oil palm plantations where unauthorized parties should not be around the area.

During a field visit, the auditor found several children playing around the area, ignoring the potential hazards that might occur. Based on this, the auditor team encouraged the company to review the mitigation of potential hazard risks around the reservoir (OFI)

3.6.2

Based on document review as well as field observations in warehouses and harvesting activities, known that the company has completed OHS instructions such as banners for gathering points, evacuation routes, and OHS warnings in order to controlling risks and potential hazards for all employees, for example, warning about PPE mandatory areas at each station according to the identification of risks and potential hazards.

In additions, the company carries out activities to monitor the effectiveness of the OSH plan such as:

- Regular monthly OHS meetings for each unit in the context of the effectiveness of the OSH plan that has been prepared in the beginning of the year.
- MCU.
- The company simulates land fires per semester
- Hold a First Aid Kit Simulation for each management unit.

Based on interview with the Manpower Agency of Pasaman Barat Regency, it is known that occupational accidents have been reported regularly in the OHS Guiding Committee quarterly report where there have been no deaths.cases of fatality.

Status: Comply

3.7

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

3.7.1

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

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

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

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

As explained above, apart from having a training program for each worker according to the type of work, the company also regularly conducts refreshment training every year. This is proven by evidence of routine socialization which is considered to be still needed by workers. If the results of the performance evaluation conducted show that all workers have sufficiently understood their duties/responsibilities, the company will not carry out refreshments related to this matter.

Based on this explanation, it can be concluded that the certification unit has a documented training program for all staff, workers, smallholders and outgrowers taking into account specific needs related to gender and covering aspects of the RSPO principles and criteria in a form that they can understand and includes assessment of training.

3.7.2

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

- Socialization of company policies, mechanisms/procedures for complaints, disputes, providing information, communication and consultation to the third parties (contractor, supplier and others) on 11 August 2022.
- Socialization of company policies, mechanisms/procedures for complaints, disputes, providing information, communication and consultation to the surrounding community (Head of Sasak Sub-District, Wali Nagari Sasak, Wali Nagari Kapa, Wali Nagari Maligi, Ninik Mamak Sasak, Ninik Mamak Kapa, Ninik Mamak Maligi and others) on 14 January 2022.
- Socialization of company policies, complaint procedure and collective labor agreement to all workers on 16 August 2022.
- Socialization of company policies, complaint procedure and collective labor agreement to all workers on 20 October 2022.
- First aid training given to workers and first aid officer on 20 October 2022.

Based on field observations and interviews with workers (harvesters, sprayers and mill operators), it is known that workers have understood their work in accordance with the procedures set by the company and their understanding of the duties and responsibilities for each job has been carried out quite well, because the certification unit has routinely conducted training every year according to the type of work each. Meanwhile, the results of interviews with representatives of contractors, contractor workers in field and the surrounding community (Wali Nagari Sasak, Wali Nagari Kapa, Wali Nagari Maligi, Ninik Mamak Sasak, Ninik Mamak Kapa, Ninik Mamak Maligi and others) revealed that they had received routine socialization related to company policies, code of conduct, PPE, communication procedures and complaints were routinely provided by the certification unit which causes stakeholders to understand the procedures and work methods that already exist in the company's operational area.

Based on the foregoing, it can be concluded that the certification unit has an identification and training program for all workers including stakeholders (contractors, suppliers, local communities and smallholders) related to the RSPO P&C and all of them have been well documented.

3.7.3

The regular dissemination and training of the procedures has been conducted on 13 January 2023 with the numbers of participants 10 persons. the results of interviews with Head of Administration and weighbridge operator showed that workers have already known the duties and responsibilities of each in the implementation of SCCS in accordance with the procedure

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1; 3.8.2

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

3.8.3

Mill has an estimated total tonnage of certified CPO and PK for the next 12 months which can be seen in the table below

Product	Last Year Projected Certified Volume (Ton)	Actual Certified Volume from January – December 2022 (Ton)	Projection of Certified Volume (Ton)
FFB	81,600	71,853.27	82,000.00
CSPO	15,422	13,268.78	15,580.00
CSPK	3,236	2,926.26	3,485.00

The estimation of FFB, CSPO, and CSPK product only from certification scope of supply base, not including from other source.

3.8.4

The Mill has registered as RSPO member under Wilmar International Ltd (No. 2-0017-05-000-00), and also registered in RSPO Palm Trace as PT Gersindo Minang Plantation with License ID CB132561, and Member ID RSPO_PO1000002133.

The reporting requirements in the period of 12 months previous the audit has been conducted by the Mill through RSPO Palm Trace, such as product sales announcement and confirmation from the buyer. Other than that, the product sold in another certification scheme has been removed.

3.8.5

The Mill has had procedures of RSPO Supply Chain of Mass Balance (No. SOP-MILL-243Rev. 09 dated 02 October 2021). The regular dissemination and training of the procedures has been conducted on 13 January 2023 with the numbers of participants 12 persons. the results of interviews with Head of Administration and weighbridge operator showed that workers have already known the duties and responsibilities of each in the implementation of SCCS in accordance with the procedure

The procedure has covered all aspects in latest RSPO supply chain standard, such as receiving and recording that identify the traceability of RSPO certified and uncertified source and products, FFB processing, the announcement in RSPO Palm trace will be conducted monthly, key persons such as security, weight bridge clerk, dispatch/kernel officer, production clerk, Administration Head, as well as the training.

3.8.6

The company has had the internal audit procedure (PRO-GEN-003 rev 05 dated 02 October 2021) which described the internal audit conducted every 12 months. Based on document review, the latest internal audit for supply chain has been conducted on 19 July 2022. All SCCS indicators has been assessed and complied.

Management Review of RSPO supply chain implementation conducted on 03 January 2023. The management review discussion has covered the input from internal audit result, correction and corrective action, customer feedback, process Performa and product compliance, follow up of previous management review, and recommendation for improvement.

3.8.7

GMP POM has record the FFB received from certified and uncertified source every month in document of Mass Balance AMP. This document informed about source of FFB, quantity of FFB received from sources, quantity of FFB processed, CSPO and CSPK production and sales, and also CPO and PK uncertified production and sales. All part of information is presented on three monthly bases.

The Mill has maintained the records of goods such as in the form of FFB Delivery Note and Mass Balance data, that identify amount and sources of FFB certified and uncertified that received, as well as the certified products (CSPO and CSPK). The data are shown as follows:

Month	FFB (MT)		Total
	RSPO Certified	Non-Certified	
Jan-22	5,404.13	11,241.86	16,645.99
Feb-22	4,851.38	13,829.14	18,680.52
Mar-22	6,542.90	15,471.66	22,014.56
Apr-22	5,383.31	15,390.20	20,773.51
May-22	5,348.16	11,332.62	16,680.78
Jun-22	5,642.51	18,663.80	24,306.31
Jul-22	6,802.74	16,346.31	23,149.05
Aug-22	7,779.90	16,322.61	24,102.51
Sep-22	7,354.47	16,260.17	23,614.64
Oct-22	5,579.88	12,756.07	18,335.95
Nov-22	5,818.24	15,247.47	21,065.71

Dec-22	5,345.65	14,067.84	19,413.49
Total	71,853.27	176,929.74	248,783.01

Regarding projection of overproduction of certified product during last years it was known there is overproduction against credit given during one year of license as presented table below:

Product	Last Year Projected Certified Volume (Ton)	Actual Certified Volume from January – December 2022 (Ton)	Projection of Certified Volume (Ton)
FFB	81,600	71,853.27	82,000.00
CSPO	15,422	13,268.78	15,580.00
CSPK	3,236	2,926.26	3,485.00

However, if the data production with licensed period (since 21 May 2022) it was known the productions still below the projections with CSPO Produced are 8,162.80 MT and CSPK Produced are 1807.33 MT, Furthermore, mechanism for handling non conforming product ruled in the :

1. SOP Mill 026 Rev 09 Dated 02 October 2021 about Method of acceptance FFB
2. SOP Mill 026 Rev 20 Dated 02 October 2021 about Commodity Delivery
3. SOP-MILL-24 Rev. 09 dated 02 October 2021 about RSPO Supply Chain Mass Balance

3.8.8

Based on documents verifications, interviews with management as well as verification through Palm Trace it was known during the period during January 2022 – December 2022 there are **13,094.81** MT CSPO, **2,906.56** MT CSPK Dispatch under RSPO Certified

Documents verification and interview during audit it was known the claimed RSPO product of CSPO and CSPK is no longer than 3 months since the product delivered. The unit of certification can present the supporting documents were contract agreement, delivery order, delivery ticket, report of loading, weighing minutes, weighing card, and delivery note. Those documents cover information of delivery date, description of product and supply chain model, product quantity, certificate number, sender's name, and address of the seller. Based on documents verifications the unit of certification can present if the Shipping announcement is announced no longer than three months, as presented in the sample below:

1. CSPO

Shipping announcement with transaction id TR-06d5425a-fe75 volume of CSPO 1,246.52 MT, a module of SCCS MB, dated 19 December s2022 with the buyer PT Wilmar Nabati Indonesia Padang (Member ID RSPO_PO1000002322), the mill can present

- Sales Contract 2731102841, with Delivery Order No with No 275211493 dated 04 November 2022
- Weighbridge period 1- 30 November 2022, with example weighbridge documents dated 21 November 2022 with volume 14,1200 Kg, in weighbridge ticket described CSPO/RSPO MB, Certificate number MUTU RSPO/038,
- Documentation of Shipping Period 1 – 30 November 2022, with transporter from buyer (Sumatera Sarana Sekar Sakti)

2. CSPK

Shipping announcement with transaction TR-30fbd5b3-2ce7 volume of CSPK 251.64 MT, a module of SCCS MB, dated 05 January 2023 with the buyer PT Usha Inti Padang (Member ID RSPO_PO1000002323), the mill can present

- Sales Contract 2731102842, with Delivery Order No with No 275211492 dated 04 November 2022
- Weighbridge period 1- 30 November 2022, with example weighbridge documents dated 14 November 2022 with volume 22,330 Kg, in weighbridge ticket described CSPK/RSPO MB, Certificate number MUTU RSPO/038,
- Documentation of Shipping Period 1 – 30 November 2022, with transporter from buyer (Sumatera Sarana Sekar Sakti)

3.8.9; 3.8.10; 3.8.11

There are no contractors for processing or physical handling of RSPO certified oil palm products including certified product Transportations. The whole CPO and PK transportation were the responsibility of the buyer based on sales contract.

3.8.12

The Mill has maintained accurate, complete, and up to date records related RSPO Supply Chain implementation that kept at least 2

years in accordance with Mill's procedure. The records variable cover FFB received from certified and uncertified sources, production of CPO and PK (certified, noncertified, total), products dispatch (as RSPO certified, sold in another certified scheme, sold as non-certified, total sold), as well as balance/stock of certified products.

The Mill balancing the certified products and dispatch on a three-monthly basis. Based on the Mass Balance record, the Mill only sells certified products from a positive stock in three monthly periods.

Based on the Mass Balance record, the Mill only sold certified products from a positive stock within the three-monthly basis. The summary of Mass Balance data in the period of 12 months previous the audit can be seen on the table below:

Month	FFB (MT)		Total
	RSPO Certified	Non-Certified	
Jan-22	5,404.13	11,241.86	16,645.99
Feb-22	4,851.38	13,829.14	18,680.52
Mar-22	6,542.90	15,471.66	22,014.56
Apr-22	5,383.31	15,390.20	20,773.51
May-22	5,348.16	11,332.62	16,680.78
Jun-22	5,642.51	18,663.80	24,306.31
Jul-22	6,802.74	16,346.31	23,149.05
Aug-22	7,779.90	16,322.61	24,102.51
Sep-22	7,354.47	16,260.17	23,614.64
Oct-22	5,579.88	12,756.07	18,335.95
Nov-22	5,818.24	15,247.47	21,065.71
Dec-22	5,345.65	14,067.84	19,413.49
Total	71,853.27	176,929.74	248,783.01

CSPPO production and Dispatch GMP POM (Jan – Dec 2022)

Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
opening stock	129.54	211.65					
Jan-22	967.36	2,052.85	3,020.21	938.82			938.82
Feb-22	881.64	2,407.11	3,288.75	899.52			899.52
Mar-22	1,047.15	2,847.98	3,895.13	1,098.68			1,098.68
Apr-22	1,166.55	2,812.64	3,979.19	825.26			825.26
May-22	913.75	2,114.98	3,028.73	994.09			994.09
Jun-22	935.91	3,282.65	4,218.57	1,213.79			1,213.79
Jul-22	1,289.28	3,009.34	4,298.63	1,217.71			1,217.71
Aug-22	1,353.76	3,015.31	4,369.08	1,309.08			1,309.08
Sep-22	1,425.98	2,990.91	4,416.89	1,360.65			1,360.65
Oct-22	1,096.87	2,297.09	3,393.96	930.27			930.27
Nov-22	1,041.90	2,727.82	3,769.72	1,250.00			1,250.00
Dec-22	1,019.09	2,502.97	3,522.06	1,056.95			1,056.95
Total	13,268.78	32,273.30	45,200.90	13,094.81			13,094.81
Closing Stok 2022	303.51	500.22					

CSPK production and Dispatch GMP POM (Jan – Dec 2022)

Period	CSPK production (MT)		Total	Cert CSPK Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
opening stock	22.95	51.32					
Jan-22	219.43	443.10	662.53	211.82			211.82
Feb-22	205.28	560.76	766.05	213.42			213.42
Mar-22	238.28	659.20	897.47	232.62			232.62
Apr-22	258.94	662.08	921.02	214.24			214.24
May-22	174.06	398.96	573.02	206.81			206.81
Jun-22	222.40	793.52	1,015.92	245.05			245.05
Jul-22	278.45	671.41	949.86	249.95			249.95
Aug-22	304.90	685.61	990.52	305.86			305.86
Sep-22	294.84	631.31	926.15	300.00			300.00
Oct-22	238.03	504.13	742.15	251.79			251.79
Nov-22	234.39	612.67	847.06	225.00			225.00
Dec-22	234.32	579.80	814.12	250.00			250.00
Total	2,926.26	7,253.88	10,105.87	2,906.56			2,906.56
Closing Stok 2022	42.65	116.96					

Based on table above, its summarized in the following table:

a. Tonnage Product

Description	Volume (MT)
Certified FFB	71,853.27
CSPO Production	13,268.78
CSPK Production	2,926.26

b. Product Selling

Description	Volume (MT)
CSPO sold as RSPO certified product	13,094.81
CSPK sold as RSPO certified product	2,906.56
CSPO sold under another scheme	-
CSPK sold under another scheme	-
CSPO sold as conventional	-
CSPK sold as conventional	-

3.8.13; 3.8.14

Based on document verifications and interview with management it was known if there is no conversion rate of production of CPO (OER) and PK (KER) that applied by the mill. The production of CPO (OER) and PK (KER) are based on actual daily, monthly, and yearly production.

3.8.15

The Mill only applying RSPO Supply Chain Module of Mass Balance.

3.8.16

Based on documents verifications, interviews with management as well as verification through Palm Trace it was known during the period during January 2022 – December 2022 there are **13,094.81 MT CSPO, 2,906.56 MT CSPK** Dispatch under RSPO Certified

Documents verification and interview during audit it was known the claimed RSPO product of CSPO and CSPK is no longer than 3 months since the product delivered. The unit of certification can present the supporting documents were contract agreement, delivery order, delivery ticket, report of loading, weighing minutes, weighing card, and delivery note. Those documents cover information of delivery date, description of product and supply chain model, product quantity, certificate number, sender's name, and address of the seller. Based on documents verifications the unit of certification can present if the Shipping announcement is announced no longer than three months, as presented in the sample below:

- Shipping announcement with transaction id TR-06d5425a-fe75 volume of CSPO 1,246.52 MT, a module of SCCS MB, dated 19 December s2022 with the buyer PT Wilmar Nabati Indonesia Padang (Member ID RSPO_PO100002322), based on documents verifications the product was delivered on 01 – 30 November 2022
- Shipping announcement with transaction TR-30fd5b3-2ce7 volume of CSPK 251.64 MT, a module of SCCS MB, dated 05 January 2023 with the buyer PT Usha Inti Padang (Member ID RSPO_PO100002323), based on documents verifications the product was delivered on 01 – 30 November 2022

3.8.17

The products were claimed as mass balance. The Mill does not use RSPO logo or trademark on product or off product.

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

The company has had a Human Rights Policy signed by Group Plantation Head and Group CSR Head, updated January 2018 and is included in the Wilmar Policy (November 2019) at point 3 that it will not do exploitation of fellow humans and local communities. The company also has a Grievance Procedure for The Implementation of Wilmar's No Deforestation, No Peat, No Exploitation (NDPE) Policy updated version 2.0 June 2019. At point 4.2 in the document, explained about the Protection of Human Rights Defenders, Whistleblowers, Complainants and Community Spokespersons

During the audit carried out, the team auditor has been trying to ensure this policy has been communicated and implemented through stakeholder consultation. Based on interviews with workers, the surrounding community (village head, community leaders, smallholder's representative), and contractors knew that the company has socialized company policies regularly including policies on human rights.

4.1.2

The Unit of certification does not instigate violence or any form of intimidation in its operations, when there is a demonstration from the community, the company prioritizes a persuasive approach by suggesting to report to the government or relevant agencies with supporting evidence. this has been confirmed with the local government and relevant stakeholders at the time of the audit

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

Unit certification can demonstrate the existence of conflict, complaint and grievance handling procedures such as:

- Procedure for Acceptance of Complaints and Dispute Resolution (PRO-BNM-007, Effective 09 February 2017, Revision 05). This procedure is a technical guide in accepting various complaints submitted by stakeholders or other related parties as well as the resolution process.

- Employee Complaints and Grievance Procedure (PRO-HRD-005, effective date 01 January 2022). This procedure is a guideline for accommodating complaints and complaints from employees who work at PT Gersindo Minang Plantation and PT Permata Hijau Pasaman.
- Procedure of dispute resolution is presented in document No. SOP/34/PR/4/0921. Procedure mentioned that problem resolve has focused outside court system. There is also procedure of grievances or complaint which presented in document No. SOP 42/HRD/0/0609. Person in charge to handle disputes, grievances and complaints from external and internal were conducted by Bina Mitra Officer, Estate Manager and Field Officer, as mentioned in document No. SOP.44/PR/10/0921 Revision 10 dated 21th September 2021. The later procedure mentioned that public relation for resolution has divided into several parts/aspects, as follows:
 - Relationship with permit, legality and government institutions.
 - Relationship with social communities.
 - Relationship with Land release/indemnity compensation.
 - Relationship with security.
 - Relationship with community development and company social responsibility.
- SOP No. PRO-BNM-016 dated on 1 January 2022 concerning in handling external grievance. The policy explained the mechanism of external communication (e.g: contractors, suppliers, government agency, residents, and NGO) including the mechanism if there were any grievances.
- NDPE policy (Non-Deforestation, Peat, and Exploitation) dated on 15 November 2019. This policy stated that Wilmar Group also concerning on whistleblowing system policy. The policy explained the company regulation in reporting violation complaints and protecting and providing security for whistleblowers or witnesses in Wilmar Group.

Based on the procedure above, it is explained that if it is related to complaints from other stakeholders (external / non-employee), the person responsible for receiving complaints is *Bina Mitra* at the unit (estate) level and then forward them to *Bina Mitra* Regional Office. If the complaint comes from the employee (internal), then the person in charge of receiving complaints (verbal or written) is the supervisor in each work unit and then forward it to the Personal General Affairs (PGA) / Workers Union by filling out the Complaint Acceptance Form (FRM-HRD- 052). As for the options for using a third party or a mediator have been described in this SOP in point 6.

All of the above procedures were made by the certification unit as a reference for carrying out communication activities, resolving complaints and conflicts that occurred during certification unit carrying out its operational activities. Although the procedure was made by the certification unit, parties who are relevant stakeholders such as the surrounding village communities have also been given socialization regarding this matter and since January until December 2022 there have been no problems in the procedure. This is in line with the results of interviews with Wali Nagari Sasak, Wali Nagari Kapa, Wali Nagari Maligi, Ninik Mamak Sasak, Ninik Mamak Kapa, Ninik Mamak Maligi and others which stated that the existing communication, complaint and conflict resolution procedures were deemed not burdensome to the village and its community. However, certification unit can show the documentation of socialization of Procedure to surrounding village such as:

- Socialization of company policies, mechanisms/procedures for complaints, disputes, providing information, communication and consultation to the third parties (contractor, supplier and others) on 11 August 2022.
- Socialization of company policies, mechanisms/procedures for complaints, disputes, providing information, communication and consultation to the surrounding community (Head of Sasak Sub-District, Wali Nagari Sasak, Wali Nagari Kapa, Wali Nagari Maligi, Ninik Mamak Sasak, Ninik Mamak Kapa, Ninik Mamak Maligi and others) on 14 January 2022.

Based on this explanation, it can be concluded that the certification unit has procedures/communication systems, complaints and conflict resolutions available for all affected parties, can resolve disputes effectively, in a timely and appropriate manner, and ensure the protection of the identity (anonymity) of the complainant, human rights defenders, community representatives, whistleblowers, if requested, as long as the report is supported by sufficient preliminary evidence. This system ensures there is no risk of retaliation or intimidation, and follows the RSPO policy of respect for human rights.

4.2.2

To ensure that everyone (people who cannot read and write) can understand the existing procedures in the system implemented by the company, which is to provide flexibility for stakeholders or employees to make complaints accompanied by representatives who can read and write. Where this has been stated in the Procedure for Receiving Complaints and Dispute Resolution, document number PRO-BNM-007, Effective February 09 2017, Revision 05. This procedure is a technical guideline in receiving various complaints

submitted by stakeholders or other related parties. and the resolution process. The procedure also ensures that everyone (people who cannot read and write) can understand the procedures in the system implemented by the company, namely providing flexibility for stakeholders or employees to submit complaints accompanied by representatives who can read and write.

However, the results of interviews with representatives of surrounding communities (Wali Nagari Sasak, Wali Nagari Kapa, Wali Nagari Maligi, Ninik Mamak Sasak, Ninik Mamak Kapa, Ninik Mamak Maligi and others), the community has known about the communication procedures and to people who served as communicators between the company and community so that people who cannot read / write can be informed by the related communicators. This has been stated in the SOP for the Appointment of Consultation and Communication Officers with the Community, SOP number 44/PR/10/0921 Revision 10 dated 21th September 2021, which among other things explains that in order to conduct consultation and communication with the community, a delegation is appointed with the given authority (in this case, Bina Mitra staff for external parties).

Based on the explanation above, it can be concluded that the certification unit has procedures to ensure the system is understood by affected parties, including those who cannot read and write that are well documented.

4.2.3

In 2022 there were several complaints/claims submitted or/and still ongoing by external stakeholders (especially the Surrounding Village/Ninik Mamak/others) related to the certification unit. From the several complaints/demands that came in, there were still 3 complaints/demands that were ongoing/continuing until the audit activity took place. An example is submissions as follows:

- The complaint submitted by KSK on 21 January 2022 was about a company water pipe passing through the smallholder area belonging to KSK, so that the land owner asked the company to provide compensation in the form of a daily wage. The company responded directly to this letter on the same day by stating that the letter would be submitted to the management and if there was a decision, it would be officially submitted again. The result was that on 22 July 2022 the company officially wrote to KSK stating that it refused to provide compensation and this matter would be resolved together with the cooperative. The results of the last negotiation on 12 January 2023, the company has resolved the complaint by jointly holding a meeting between KSK, the company and the cooperative, the result is that the KSK is no longer concerned about this matter and is no longer demanding compensation.
- Apart from the complaints above, the certification unit also has grievances that have not been completed/continued until the audit activities take place such as Demands from KAN (*Kerapatan Adat Nagari*) Nagari Kapa for an area of 697 hectares in the area of PT Permata Hijau Pasaman and its hasn ben informed in critrian 4.8

In the explanation above, certification unit has responded to the letter related to the land claim sent by the complainant and the response given along with the progress/decision on the response has been known by the reporting party. This is the same as the settlement of other claims/complaints apart from the examples given above, the certification unit has responded to every complaint/claim submitted to it in accordance with the provisions stipulated in the procedure and has been well documented and known by the parties in the in it.

In addition to complaints submitted by external parties, the company has also properly documented the handling of complaints internally. This is evidenced by the existence of a complaint book available in each unit, in which the book contains information regarding the complainant, the date, and the status of the complaint. For example, the following are the complaints in each unit, namely:

- The complaint on 12 December 2022, which was submitted by workers with the initials JKO related to the broken bathroom floor in the workers' house. The certification unit has responded to this on 13 December 2022 and made repairs to the damage. Evidence of repair of the damage has been shown by documentation before and after repairs have been made.
- The complaint on 19 August 2022, which was submitted by worker with the initials DON related to the Septic Tank that was damaged in the worker's house. The certification unit has responded to this in the same day and has been made repairs to the damage on 29 August 2022. Evidence of repair of the damage has been shown by documentation before and after repairs have been made.

Based on the results of interviews with estate workers, mill and representatives of the Bipartite Committee, it is known that the workers have a good understanding of the complaint submission procedures established by the company and every complaint submitted has been recorded in the complaint book in each unit. Every complaint submitted in 2022 is only in the form of complaints related to the facilities provided by the company.

Based on this, it can be concluded that the unit of certification has informed the progress of handling complaints to the parties, including the agreed time frame, and the results are available and communicated to the relevant stakeholders.

4.2.4

The certification unit also has a SOP on Procedures for Receiving Complaints and Settlement Specifically for Disputes outside the Court, document number SOP 34/PR/4/0217, effective date 21st September 2021, which among other things explains the procedures for submitting complaints such as written submissions, submissions during meetings annual, recording in the register book and may involve an independent third party. This has been implemented by the company in giving freedom to the reporting party to obtain legal and technical assistance from an independent party. This was further strengthened by the results of interviews with Wali Nagari Sasak, Wali Nagari Kapa, Wali Nagari Maligi, Ninik Mamak Sasak, Ninik Mamak Kapa, Ninik Mamak Maligi and others which stated that when their residents had disputes or land claims to the company in previous years, the community was given the freedom to ask for legal and technical assistance from independent parties such as lawyers. and other parties to manage this matter. This proves that the certification unit in general has carried out its procedures to give the reporting party the freedom to obtain legal and technical assistance from a third party in the event of a dispute.

In Indonesia, giving freedom to the reporting party to obtain legal and technical assistance from an independent party is allowed and there is none regulation/procedure in certification unit that forbids it. An example is the resolution of the problem described above in which the company provides options/options to the heirs to obtain legal assistance from other independent parties.

Based on the results of document review and interviews, it is known that conflict resolution mechanisms can use the option to obtain legal and technical assistance from independent parties, this can be proven by the existence of conflict resolution related to land clearing and plasma land development between companies and communities involving NGOs and the RSPO, in addition, the company also has records regarding every progress of the conflict resolution process.

Based on the explanation and description above, it can be concluded that the certification unit has a conflict resolution mechanism/procedure which includes the option to obtain legal and technical assistance from an independent party, where the reporting party has the freedom to choose a person or group who can support it and/or act as observers as well as the parties may choose the option of involving a third-party mediator.

Status: Comply

4.3

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

Based on the results of interviews with management and verification of documents, it is known that the company already has a community contribution program based on the results of consultations with the community contained in the CSR program. Consultations are carried out through annual meetings or through proposals submitted by the community. In addition, the company also showed several proposals for requests for assistance that submitted to the company.

The realization of CSR for the period 2020-2021 is as follows:

- Computer assistance to the school of Nagari Aia Gadang, assistance for sports activities, cement assistance at Al Hidayah School in January 2021.
- Computer assistance at SDN 28 Pasaman, futsal open tournament assistance in March 2021.
- Material assistance for fire victims of the Jorong Tanjung Pangka, assistance for coconut seeds Jorong Labuih Lurus & Jorong Tanjung Pangka, construction assistance of a prayer room in Nagari Lingkuang Aua, cement assistance for Jorong Tanjung Pangka, repair of the Labuih Lurus main road in June 2021.
- Assistance for maintenance of the Tanjung Pangka bridge in August 2021.
- Assistance for Alek Gadang activities in October 2021, etc

The results of interviews with representatives of the surrounding community (Wali Nagari Sasak, Wali Nagari Kapa, Wali Nagari Maligi, Ninik Mamak Sasak, Ninik Mamak Kapa, Ninik Mamak Maligi and others), known that the company had realized assistances or CSR as a form of community development contribution and was carried out based on consultation with the community.

Status: Comply

4.4**Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their Free, Prior and Informed Consent (FPIC).****4.4.1**

The concession area of PT Gersindo Minang Plantation and PT Permata Hijau Pasaman is in the customary land (*Tanah Ulayat*) of Minangkabau Tribe, Sumatra Barat Province, Indonesia. The company operational area originally from submission of customary land (*Tanah Ulayat*) from Minangnese elder (*Pucuk Adat* with *Ninik Mamak*) to the government to find an investor and developed palm oil plantation with the model company and scheme smallholders. PT Gersindo Minang Plantation operational area originally from customary land of Kanagarian Lingkung Aur; PT PHP 2 from Kanagarian Sikilang and Kanagarian Maligi; and PT PHP 1 are from Kanagarian Kapar and Kanagarian Sasak. The submission of customary land carried out in period of 1991 for PT GMP; 1992 and 1997 for PT PHP 1 and PHP 2.

The unit of certification has HGU for 5,861.40 Ha scope of certification as follow: HGU Certificate No. 1 Year 1997 for 3,600 Ha (GMP Estate), HGU Certificate No. 54 and 55 Year 2014 for 1,247 Ha (PHP-1 Estate) and HGU Certificate No. 18 Year 2005 for area 1,014.40 Ha (PHP 2 Estate). Based on information from external stakeholder and review on hectare statement of 2021/2022, there is no expansion and new planting area. However, scope of certification is stick on HGU area (5,861.40 Ha).

4.4.2. 4.4.3; 4.4.5

PT GMP and PT PHP are long established company which has been started operational since period of 1991 and 1992. As mentioned in indicator 4.4.1 The concession area of PT GMP and PT PHP is in the customary land (*Tanah Ulayat*) of Minangkabau Tribe, Sumatra Barat Province, Indonesia. Based on the results of public consultations with the Minangnese elder (*Pucuk Adat* with *Ninik Mamak* as well as previous landowner) and management, it was known that as a descendant (*Cucu Kemenakan*) of the Minangkabau tribe, they still adhere to cultural customs, especially those related to land law. Land ownership is communal ownership which is ruled in customary law. The land is wealth that cannot be divided into individual ownership and the economic value of the land is distributed evenly throughout the *Ninik Mamak* and their descendants (*Cucu Kemenakan*).

PT. GMP and PT PHP are long-established plantations company since 1991. In related to the maps of an appropriate scale that showing legal, customary or user right through participatory mapping and copies of negotiated agreements detailing process of FPIC is not applicable. This is due to no longer records dating back to the time of the decision making.

According to information gathered during stakeholder consultation with customary head (*Ninik Mamak*) which include as previous land owner it is confirmed if land acquisition has been carried out since 1991 involving the regional government The concession of PT GMP and PT PHP belongs to the customary lands of the indigenous communities as follows *Hak Tanah Ulayat Nagari* Lingkuang Aur (PT GMP), *Hak Tanah Ulayat Nagari* Sasak and Nagari Kapar PT (PHP 1) and, *Hak Tanah Ulayat Nagari* Sikilang and Maligi (PT PHP 2), the neighboring *Nagari* communities in the district of Pasaman Barat but in different sub-districts. The former lies in the subdistrict of Luhak Nan Dua and the latter lies in the sub-district of Sasak Ranah Pesisir

the *Ninik Mamak* (Customary leader), with the full knowledge of the heads of all the villages in Nagari Kapa, handed over customary lands to the Regent of Pasaman, who further granted these areas to the oil palm investor, The handover was recorded in a land handover letter signed by the *Ninik Mamak* with full knowledge of the village heads, as follows.

- **GMP Estate (PT. GMP):**

Agreement letter for releasing of Customary Right "Hak Tanah Ulayat Nagari Lingkuang Aur" dated 5 November 1991.

- **PHP-1 Estate (PT. PHP):**

Record of Agreement letter for releasing of Customary Right "Hak Tanah Ulayat Nagari Sasak and Nagari Kapar" dated 28 July and 6 February 1997.

- **PHP-2 Estate (PT. PHP):**

Record of Agreement letter for releasing of Customary Right "Hak Tanah Ulayat Nagari Sikilang and Maligi" 16 July 1992 and 14 September 1997.

4.4.4.; 4.4.6

As mentioned on indicator 4.4.1 The concession area of PT Gersindo Minang Plantation and PT Permata Hijau Pasaman is in the customary land (*Tanah Ulayat*) of Minangkabau Tribe, Sumatra Barat Province, Indonesia. The company operational area originally from submission of customary land (*Tanah Ulayat*) from Minangnese elder (*Pucuk Adat* with *Ninik Mamak*) to the government to find

an investor and developed palm oil plantation with the model company and scheme smallholders. he submission of customary land carried out in period of 1991 for PT GMP; 1992 and 1997 for PT PHP 1 and PHP 2.

The company has developed a mechanism of Implementation of Free Prior Informed Consent as document Process of land compensation has been appropriate with its procedure *“SOP Pembebasan Lahan (SOP-IJIN LAHAN&OPS-006), dated 15 October 2008”* that describes the mechanism of settlement of border land disputes, land occupation disputes, social issues. In such mechanisms it has explained the procedures and methods of FPIC.

In addition, as part of the company's development, the company has also developed palm oil plantations for the community through a smallholder scheme The development of the smallholder scheme is one of the company's efforts so that the community around the company can benefit from the company's existence. In addition, to facilitate community access, the company has opened and built access roads to the community, where there are 6 access roads that cross the company connecting the surrounding villages/hamlets. With the existence of this access road, it is easier to access from villages / hamlets that were previously via the river, now can pass through the company's access road. this information has been verified through public consultation with village head and government agency as well as workers who still live around the company.

4.4.6

even though the company has obtained land title, there were complaints/issues regarding land issues in PHP 1 Estate. this issue between PT PHP and the Kanagarian Kapa, the issue regarding this issue stems from the demands of the community regarding the construction of a plasma plantation which is said to have not been realized according to the initial agreement (MOU). Regarding that's issue on 13 February 2020 an agreement was reached with the Kenagarian Kapa Indigenous People, Luhak Nan Duo District, Pasaman Barat Regency, Province Sumatra Barat, This document was signed by the parties, including: Representatives of PT PHP 1, Representatives of Kenagarian Kapa, Representatives of the RSPO Indonesia, Pasaman Barat Regency Government Representative and IMN Facilitator Team, signed on a stamp duty of Rp. 6,000. The main points of the document include: that PT PHP paid compassion monthly to Gampo Alam Pucuk Adat and Ninik Mamak Nagari Kapa until the HGU expires. As a follow-up to the agreement, PT PHP has periodically paid monthly compensation for 6 months until July 2022.

In August 2020 there were objections from other parties in the Kapa Indigenous People and reoccupied the agreed area, and to date (January 2023) the occupied area is 463 Ha. Because of this, as informed by the management and traditional leaders, the tali asih fund should have been postponed. The results of a document review, interviews with the management and traditional kanagarian leaders when the demands of the people who occupy the area have been declared unacceptable by the court.

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 4.5.8

Based on area statement document, interview with stakeholder known that there is no new planting in the area of PT GMP and PT PHP. There are only replanting activities on the area that previously had the land use right (HGU certificate).

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

Procedure of land acquisition available in the documents Free Prior Informed Consent as document Process of land compensation has been appropriate with its procedure *“SOP Pembebasan Lahan (SOP-IJIN LAHAN&OPS-006), dated 15 October 2008”* that describes the mechanism of settlement of border land disputes, land occupation disputes, social issues. In such mechanisms it has explained the procedures and methods of FPIC.

4.6.3

PT GMP and PT PHP are long established company which has been started operational since period of 1991 and 1992. As mentioned in indicator 4.4.1 The concession area of PT GMP and PT PHP is in the customary land (*Tanah Ulayat*) of Minangkabau Tribe, Sumatra Barat Province, Indonesia. Based on the results of public consultations with the Minangnese elder (*Pucuk Adat* with *Ninik Mamak* as well as previous landowner) and management, it was known that as a descendant (*Cucu Kemenakan*) of the Minangkabau tribe, they still adhere to cultural customs, especially those related to land law. Land ownership is communal ownership which is ruled in customary law. The land is wealth that cannot be divided into individual ownership and the economic value of the land is distributed evenly throughout the *Ninik Mamak* and their descendants (*Cucu Kemenakan*).

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4.6.4

even though the company has obtained land title, there were complaints/issues regarding land issues in PHP 1 Estate. this issue between PT PHP and the Kanagarian Kapa, the issue regarding this issue stems from the demands of the community regarding the construction of a plasma plantation which is said to have not been realized according to the initial agreement (MOU). Regarding that’s issue on 13 February 2020 an agreement was reached with the Kenagarian Kapa Indigenous People, Luhak Nan Duo District, Pasaman Barat Regency, Province Sumatra Barat, This document was signed by the parties, including: Representatives of PT PHP 1, Representatives of Kenagarian Kapa, Representatives of the RSPO Indonesia, Pasaman Barat Regency Government Representative and IMN Facilitator Team, signed on a stamp duty of Rp. 6,000. The main points of the document include: that PT PHP paid compassion to Gampo Alam Pucuk Adat and Ninik Mamak Nagari Kapa until the HGU expires. As a follow-up to the agreement, PT PHP has periodically paid monthly compensation for 6 months until July 2022.

In August 2020 there were objections from other parties in the Kapa Indigenous People and reoccupied the agreed area, and to date (January 2023) the occupied area is 463 Ha. Because of this, as informed by the management and traditional leaders, the tali asih fund should have been postponed. The results of a document review, interviews with the management and traditional kanagarian leaders when the demands of the people who occupy the area have been declared unacceptable by the court.

The results of interviews with traditional leaders of Kanagarian Kapa explained that by not accepting claims from some communities, they had communicated with the company regarding the compassion, which had temporarily been postponed. In this regard, companies are encouraged to respond or respond to requests from indigenous peoples regarding compassions. (OFI)

Status: Comply

4.7

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

4.7.1

The company has procedure to identify legal rights, customary, rights and to identify persons entitled to compensation in the SOP document for Land Dispute Resolution (SOP 30/BM/2/0320). This document explains about the factors that cause land disputes, which also includes the sequence for identifying people who are entitled to compensation.

4.7.2

Company has procedure to calculate the compensation in document of SOP *Panduan Teknis Perolehan Lahan/Pembebasan Lahan* (Guidance for Land Acquisition) (SOP 29/BM /0409). This procedure is the company' technical guide to ensure that the decisions and actions in the process of land acquisition is done properly and correctly according to the provisions and the applicable legislation, also for calculation of compensation. In the procedure has also informed the stage of the process involving the Village Head, Head of Regency and National Land Agency. Based on interviews with communities, stated that SOP has been disseminated.

4.7.3

The company has several policies, as well as SIA management and monitoring plan, that has some purposes to improve livelihoods quality of surrounding communities, includes the previous landowner, such as acceptance of local workers and contractors if needed, economic development program, and any other CSR programs. Based on interview with surrounding communities known that company has provided village with economic development program and any other CSR programs.

In addition, as part of the company's development, the company has also developed palm oil plantations for the community through a smallholder scheme The development of the smallholder scheme is one of the company's efforts so that the community around the company can benefit from the company's existence. In addition, to facilitate community access, the company has opened and built access roads to the community, where there are several access roads that cross the company connecting the surrounding villages/hamlets. With the existence of this access road, it is easier to access from villages / hamlets that were previously via the river, now can pass through the company's access road. this information has been verified through public consultation with village head and government agency as well as workers who still live around the company.

Status: Comply

4.8

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

4.8.1; 4.8.2; 4.8.3; 4.8.4

Based on document review, District Government facilitated Wilmar to start their operation in Agam and Pasaman Barat District since early 1990. There also no new planting or new acquisition process after 2018. Due to Minangnese customary right, the land acquisition process has proceeded with Minangnese elder called *Ninik Mamak* (customary leader and representatives) and witnessed by government agency. Company representatives has been met with *Ninik Mamak* in each operation area to discuss about land acquisition scheme. The process has been made in Indonesian language and provided by participatory mapping.

As a guidance to settlement land dispute the company has had procedure to handling and manage land conflict (*Prosedur Penyelesaian Sengketa Lahan* No. Dok: PRO-BNM-013, Rev. 02 dated 23 Augustus 2016). This procedure are contain a specific guidance which is refer to FPIC mechanism to manage land conflict such as gathering information, conduct a meeting with complainant and use the understanding language during the process. As explained by the management representative, a mutually agreed upon system for handling complaints will be established when a conflict found.

even though the company has obtained land title, there were complaints/issues regarding land issues in PHP 1 Estate. this issue between PT PHP and the Kanagarian Kapa, the issue regarding this issue stems from the demands of the community regarding the construction of a plasma plantation which is said to have not been realized according to the initial agreement (MOU). Regarding that's issue on 13 February 2020 an agreement was reached with the Kenagarian Kapa Indigenous People, Luhak Nan Duo District, Pasaman Barat Regency, Province Sumatra Barat, This document was signed by the parties, including: Representatives of PT PHP 1, Representatives of Kenagarian Kapa, Representatives of the RSPO Indonesia, Pasaman Barat Regency Government Representative and IMN Facilitator Team, signed on a stamp duty of Rp. 6,000. The main points of the document include: that PT PHP paid compassion monthly to Gampo Alam Pucuk Adat and Ninik Mamak Nagari Kapa until the HGU expires. As a follow-up to

the agreement, PT PHP has periodically paid monthly compensation for 6 months until July 2022.

In August 2020 there were objections from other parties in the Kapa Indigenous People and reoccupied the agreed area, and to date (January 2023) the occupied area is 463 Ha. Because of this, as informed by the management and traditional leaders, the tali asih fund should have been postponed. The results of a document review, interviews with the management and traditional kanagarian leaders when the demands of the people who occupy the area have been declared unacceptable by the court and in the process of cassation in the Supreme Court. In this regard, companies are encouraged to continue to handle all unresolved conflicts through appropriate conflict resolution mechanisms. (OFI)

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 unit of certification has shown a document of FFB pricing determined by the company based on the price of FFB agreed upon by both parties is based on market prices based on CPO and PK prices prevailing at that time as well as historical OER estimates and FFB quality standards sent by suppliers. In fulfill the demand for FFB, certification units are supplied by 6 suppliers. The company shows an example of payment for the December 2022 period which is paid directly to the supplier's account according to a mutually agreed price. FFB price are stipulated in work agreement that agreed by both parties in chapter 3 related pricing.

The current and previous FFB prices are publicly available and can be accessed by suppliers directly via the price board in the GMP POM area and directly via personal WhatsApp media and telephone from the PIC to the supplier.

5.1.2

FFB pricing for suppliers follows the price set by the government. Based on interviews with the PT TSA and MYJ, it is known that they have received an explanation regarding the determination of the FFB price and there has never been a late payment.

Based on the explanation from management representatives, it is known that the FFB price set by company and agreed upon by both parties is based on market prices based on CPO and PK prices prevailing and updated regularly by personal WhatsApp media.

5.1.3

Based on the document review, there was a purchase of FFB in the company's business unit. The company shows several proofs of payments to suppliers, for example, payments to collectors on behalf of the PT TSA for December 30, 2022. Payment records contain completeness such as sales invoices to proof of payment via bank transfer. Payment records are by the price determined and informed by the company to suppliers.

Based on interview with FFB suppliers, PT TSA, there were no negative issues related to the realization of contractor agreements. Prices are set transparently and according to mutual agreement and there has never been a late payment.

5.1.4

Based on interview with management, when the assessment 1.4 held, all parties aren't including women member as a FFB suppliers in GMP POM.

Even so, all members consist, able to be involved in the operational activities, decision-making process, and understand the contents of the contract, not limited to men or women.

5.1.5; 5.1.6; 5.1.8

Unit of certification show document No. 001/TBS-SOPVIII/2015 which was issued on August 10, 2015, the document contains the SOP for Purchase of Oil Palm Fresh Fruit Bunches where the document states that the FFB being sold is FFB originating from its own plantation and FFB purchased from third parties or from third party plantations that enter into FFB sale and purchase agreements with FFB suppliers to the company. The FFB being sold does not originate from the partnership plasma plantations built by the

company/group of companies, and the FFB being sold is not the result of being stolen or from criminal activity.

Companies can also show document agreements with suppliers in understanding contract agreements, which are fair, legal and transparent. The example for cooperation contract is stated in the PT TSA document Number 04/GMP/TBS//2023, dated 01 January 2023. Points of agreement:

- The FFB price is agreed based on the market price which refers to the prevailing CPO and PK prices
- Payment of the FFB price is paid by bank transfer no later than 2 after the FFB cover letter (SPB) is received
- The FFB sold meets the FFB quality standards set by the company.

Unit of certification has carried out direct socialization related to RSPO certification to suppliers which was carried out on December 14 2022 and January 4 2023. From the meeting it was stated that suppliers would follow the company's initiation to include them into RSPO certification and would follow all the requirements and regulations existing as long as it does not violate the applicable customary regulations.

The company has also conducted coaching and training for suppliers, such as:

- Assistance and development the suppliers to be honest and transparent
- Increased plasma productivity.
- Increasing the income of plasma farmers.
- Socialization, coaching and training on the quality of the FFB harvested and sent to the mills.

5.1.7

The results of document verifications it was known that the certification unit has routinely calibrated the weighing equipment carried out by *UPTD Metrology Legal* Pasaman Barat Regency. The certification unit has also shown documents on the weighbridge calibration, here are;

GMP POM

- Certificate of Test Results No. 317.2/032/SKHP/UPTDML/ VI/2022 Brand: Avery Weigh Tronix/UK with a maximum capacity of 50,000 Kg which was carried out on 04 June 2022, valid until 04 June 2023
- Certificate of Test Results No. 317.2/10/SKHP/UPTDML/XI/2022 Brand: Avery Weigh Tronix/UK with a maximum capacity of 50,000 Kg which was carried out on 03 November 2022, valid until 03 November 2022

PHP Estate

- Certificate of Test Results No. 317.2/075/SKHP/UPTDML/IX/2022 Brand: PSC-68015 with a maximum capacity of 40,000 Kg which was carried out on 14 September 2022, valid until 14 September 2023

The results of observations and interviews with weigh bridge operators obtained information that the certification unit has routinely performed the calibration of weighing equipment by third parties.

5.1.9

Unit of Certification has an SOP for Communication, Consultation and Coordination Procedures with Stakeholders No. PRO-BNM-008 revision 02, November 4, 2021. In the SOP as a technical guidance in receiving various complaints raised by stakeholders or another party and way to process of completion. Public complaints can also be submitted at the annual meeting by filling out the complaint form provided by the company and then stated in the Minutes of the Annual Meeting.

Based on the results of interviews with PT Tongga Sehjahtera Abadi, they already know the mechanism for submitting complaints to the company. So far, the company has carried out good cooperation related to partnership management cooperation and this is felt to have a very positive impact on the cooperative and its members. Based on document review of complaint book in 2022, there is no complaint from external stakeholder, including EFB suppliers.

Status: Comply

5.2

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

5.2.1

The certification unit has conducted consultations with farmers who are suppliers of FFB to GMP POM as shown by evidence of the RSPO Socialization that proven from the official report on January 15, 2022 which was attended by 20 participants. This activity contains, among others:

- Sustainable oil palm cultivation
- Implementation of the sustainability system in oil palm plantations (RSPO)
- Introduction of non-environmentally friendly agricultural materials
- Anticipation and management of forest and land fires

In this outreach activity, the certification unit also promoted the RSPO that in the future, outside suppliers of FFB must also follow RSPO certification. Based on the results of the socialization carried out to FFB suppliers, conclusions were obtained is not been able to realize certification activities. This is due to the legality of the land which is currently constrained due to the status of farmers' land, most of which cannot be certified. The results of interviews with independent smallholders stated that the company is currently helping to process the legality of the land it owns so that the certification process can be carried out. The informant stated that he was very interested in joining the RSPO certification because there were quite a lot of benefits, in addition to the increase in the price of FFB, the market demand will also be higher because of the status of the fruit that has been certified.

5.2.2

Based on the results of interviews with PT TSA it is known that the company has conducted socialization and training related to RSPO, HCV, Best Practice, etc.

5.2.3

For now, Company already has 6 cooperatives that are no more included in the scope of certification. They have managed their own cooperative independently, but are still assisted in non-technical matters such as training and mentoring.

5.2.4

Unit of certification can show recordings of training on IPM and the use of pesticides to plasma farmers by PT GMP staff, for example, recordings of training to the scheme smallholders unit which was held on 2022, which was attended from PT TSA and MYJ. The training materials include the implementation of a pest census and its control.

5.2.5

Based on the explanation on indicator 5.2.1 – 5.2.3, this indicator can no longer be applied, because all cooperatives running independently and no more included in the scope of certification PT GMP. Meanwhile, other FFB suppliers have not been able to carry out the certification process.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1

The certification unit has a commitment to respecting human rights and describe in the Wilmar International Group NDPE policy against deforestation, peat, and exploitation updated in November 2019, explained that Wilmar International is committed to providing equality in employment opportunities to every employee. Our beliefs and labor standards confirm that we will not discriminate when making decision to employees, promotion or retire works/candidates based on race, color, sex, age, social class, religion, sexual orientation, politics, or disability-only subject to the conditions attached to the role to be performed. The fundamental aims are to ensure diverse and representative profiles of workers through the promotion equality of labor.

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

- The composition of workers consisting of various ethnic groups, religions, gender and workers' origins. The existing workers do not only come from one area but come from several areas spread throughout Indonesia such as Java, Sumatra, Kalimantan and others. During the audit, there was no information regarding migrant or AKAD workers (*Angkatan Kerja Antar Daerah*) in certification unit.

- Recruitment of workers based on the results of selection, performance appraisal, ability and expertise of workers. All the recruitment received based on the results of the selection of job application files, results of health checks and results of interviews. The worker also passed the test and has been accepted as permanent worker.
- Worker placement and training are carried out in accordance with their expertise / type of work, such as prospective harvest workers are placed as harvest workers and receive regular harvest training.
- Women workers are given equal rights, wages and opportunities to get promotions with male workers of the same type of work, for example there are several maintenance foreman who are female workers.

Based on the results of interviews with workers (harvester, pesticide applicator, upkeep and mill operator) at PT Gersindo Minang Plantation and PT Permata Hijau Pasaman, it is known that workers have never felt that the company has discriminated against since they first working until now. This is because all activities from recruitment, performance appraisal, promotion, and union, each worker is given the same opportunity regardless of ethnicity, caste, nationality, religion, disability, gender, sexual orientation, gender identity, membership in labor unions, affiliations. politics, or age. There is no difference between the communication between superior and workers because of the things mentioned above, so that the workers do not feel isolated or discriminated against by the superiors.

These explanations can conclude that the certification unit has policy and treated all workers equally (based on skill, quality and eligibility) without discrimination based on gender, ethnicity, religion, health conditions or others and has carried out all recruitment activities in accordance with applicable policies and procedures. owned without any act of discrimination.

6.1.2

In accordance with the explanation in indicator 6.1.1 regarding company policies and their implementation, during the audit process there were no discriminatory acts or issues that occurred in the certification unit during the past year. This is evidenced by the results of interviews with labor union representatives and the gender committee which stated that so far, the company has always been fair, there has been no discrimination against workers, starting from the local community, women and migrant workers (even though migrant workers are not owned). So far, the certification unit has also never charged a fee during the recruitment period. This is indicated by the announcement of job vacancies submitted to the surrounding community through the Nagari and Ninik Mamak, which includes the writing "Free Employee Acceptance". This was also informed by representatives of the surrounding community who stated that so far the recruitment carried out by the company had never asked for a fee (it was free).

Based on the explanation above, it can be concluded that the unit of certification has proven that workers and groups including local communities, women and migrant workers are not discriminated against nor are there fees for recruiting workers.

6.1.3

The certification unit has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Collective Labor Agreement period 2021-2023 written in Bahasa. In general, these procedures describe:

- Recruitment of workers is based on needs and adjusted to the ability of the company.
- The age of the prospective worker is a minimum of 18 years at the time of recruitment of workers.
- Recruitment of workers is based on the ability, expertise and assessment of prospective workers.
- The company is authorized to carry out the placement, transfer and promotion of workers in accordance with applicable regulations.
- Termination of employment can occur when a worker retires, dies, resigns, and terminates an employment agreement due to a serious violation and others.

As evidence that the company has carried out recruitment selection activities, providing access to training, and promotions are carried out on the basis of skills, abilities, quality and medical eligibility as required for available jobs described in indicator 3.5.2 related to assessment/competence-based recruitment and in indicator 3.7.1 it is explained that the training is prepared/planned based on the competency/position/type of work of each worker. From these two indicators it has been stated that all selection, training, medical eligibility and other activities have been in accordance with the procedures owned, for example there are no workers under 18 years of age who work/are accepted, there is no acceptance that does not match their needs/abilities, and so forth.

Based on this, it can be concluded that the certification unit has proven that selection, recruitment, employment, access to training, and promotion are carried out on the basis of skills, abilities, quality, and medical eligibility as required for available jobs and are well

documented.

6.1.4

A pregnancy test for workers is carried out every month just to ensure that pregnant workers are not allowed to do work with chemicals, not as a basis for discriminating against these workers. If declared pregnant, the worker will be transferred to a safer job but still equal in terms of wages and other benefits, so that there is no discriminatory action. This is made clear by the results of interviews with women workers in the GMP Estate, PHP 1 Estate and PHP 2 Estate in spraying and upkeep activities stating that female workers are required to have monthly pregnancy testing at the clinic to ensure that no female workers working with chemicals are pregnant / breastfeeding and testing the pregnancy is not a discriminatory measure given by the certification unit.

6.1.5

Certification unit have gender committee and are still active until today in the certification unit which is chaired by the chairperson along with coordinators in several sections and there are representatives in each unit. The structure of the gender committee not only consists of female workers but also includes male workers. The main objective of forming a gender committee is to provide a forum that can accommodate the aspirations / complaints of workers (especially women), as company partners in carrying out the activities of socialization related to gender and other policies related to workers' reproductive rights. In carrying out its activities this gender committee always collaborates with the labor union so that the socialization of matters related to women's rights can be conveyed properly and there is no discrimination in terms of gender. The workers also knew of the existence of the gender committee because it had been routinely socialized by its management, the last socialization related to the gender committee and the activity was carried out on 20 October 2022 which was attended by all workers and housing residents. The results of this socialization can be seen with the absence of differences in company operational activities such as promotional activities, the same status of workers without gender bias because overall are given equal opportunities for all genders (male or female) in work.

The results of interviews with maintenance workers (male and female workers) and representatives of the gender committee revealed that until now there were no reports / issues / complaints related to gender reported by the workers and at the moment the activities carried out were gender meetings during children healthcare (*posyandu*), women recitation weekly and others. Currently the certification unit is more focused on gender bias and equality for women because the most vulnerable parties in plantation operational activities are women, but this does not mean that the company does not focus on other genders. This is evidenced by the absence of any issues or incidents related to this from 2020 until now (December 2022).

6.1.6

Equal payment of wages has been made by certification unit properly, taking into account the ability, performance, expertise, length of work and other factors as a basis for remuneration. So that the payment of wages provided is in accordance with the burden / duties / types of work respectively. For example, security (KNS), boiler operator (SEF), upkeep (KNM), and upkeep (ERN) who get wages in November and December 2022 whose value is in accordance with the minimum wage, but with different amounts based on years of service, ability, attendance and job performance (structure and scale wage). This is in line with statements from workers who were interviewed with types of work as security, boiler operators, harvester and upkeep workers who have the same type of work but have different wage scales based on their performance, length of work in the company, productivity and other factors.

In addition, based on the results of interviews with labor union representatives, it was found that the certification unit already has a wage scale structure for each worker based on position, class, work performance, and not based on gender differences or origins. For example, the lowest wage scale is for permanent worker class 2A and the highest wage is permanent workers class 2D.

The results of interviews with workers (harvesting, spraying, security and mill operators) in GMP Mill, GMP Estate, PHP 1 Estate and PHP 2 Estate note that workers already know that there is a wage scale structure for each level of workers and this has been proven by the difference in the monthly wage income presented on the pay slip. The monthly wages received are in accordance with the grade owned by each worker and so far, there have been no complaints / errors regarding this matter.

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 certification unit has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Collective Labor Agreement period of 2021-2023 and others manpower procedures written in Bahasa. This Collective Labor Agreement explains the working conditions and rights / obligations of workers such as, recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, overtime, and other provisions. The certification unit can show that the Company Regulations have been approved by the relevant agencies as follows:

- Collective Labor Agreement for the period 2021-2023 for PT Gersindo Minang Plantation (GMP Mill and GMP Estate) which has been ratified by the Manpower Agency of Pasaman Barat Regency in accordance with Decree No. 005/PP-PKB/DISNAKER/2021 dated 28 October 2021 and valid until 28 October 2023.
- Collective Labor Agreement for the period 2021-2023 for PT Permata Hijau Pasaman (PHP 1 & PHP 2 Estate) which has been ratified by the Manpower Agency of Pasaman Barat Regency in accordance with Decree No. 003/PP-PKB/DISNAKER/2021 dated 28 October 2021 and valid until 28 October 2023.

The company regulation has been routinely disseminated by the certification unit to all employees, one example of the socialization that was carried out was on 20 October 2022 which was attended by all workers on muster morning. The results of interviews with workers (harvesters, sprayers, upkeep and mill operators) and labor union know that workers have a sufficient understanding of their rights (wages, overtime, incentives, fines, etc.) listed in the Collective Labor Agreement and in accordance with routine socialization provided by the certification unit. In addition, the payslip also contains some information that is well understood by workers, such as basic wages, fixed benefits, overtime, premiums, wage deductions (fines, taxes, and others). Workers' wages in 2022 have been accordance with the minimum wage set by the government, wage based on years of service, ability, attendance and job performance (structure and scale wage) and there are no late payments every month.

A review of the November and December 2022 wage document for harvester, upkeep and mill operators proves that the wages received are accordance with the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2022. For example, security (KNS), boiler operator (SEF), upkeep (KNM), and upkeep (ERN) have a different based on wage scale structure 2022.

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

6.2.2

The certification unit has Collective Labor Agreement are made in a Bahasa that explains the working conditions and rights / obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, working hours, remuneration, discipline, deduction, overtime, sick leaves, holiday entitlement, maternity leave and other provisions. Explanations related to the contents of the Collective Labor Agreement include:

- Employee Acceptance (recruitment, selection, transfer, promotion, performance appraisal) which explains that all workers wishing to join the company must follow the specified requirements including: being over 18 years old, having a health certificate, taking a selection exam, and other requirements.
- Working Time which explains that there are 2 types of working time in the company, namely by working 8 hours per day or 5 working days in a week and 7 hours per day or 6 working days in a week, in which the total working hours are 40 hours in a week.
- Wages which explain the wage that cannot be lower than the minimum wage set by the government every year, granting rice allowance to all workers according to its calculation, and other explanations.

In addition to being generally stated in Collective Labor Agreement, the certification unit also has a decree, policy, memorandum and work contract for workers in orientation period that specifically explain these matters. An example is:

- Inter Office Memo No. 001/WIP-HRR/Int-1/2022 in 04 January 2022 concerning Minimum Wage for Sumatera Barat Province in 2022 is IDR. 2,512,550 / month (minimum) determined based on Sumatera Barat Province Minimum Wage Determination in 2022.
- Decree of the Sumatra Barat Province No. 562-899-2021 established by the Governor of Sumatra Barat in 19 November 2021 about the implementation of the minimum wage in 2022 which explains that the minimum wage for Sumatra Barat Province for 2022 is IDR. 2,512,539 and will take effect on 01 January 2022.
- Internal memorandum No. 002/WIP-HRR/Int-1/2022 dated 04 January 2022 regarding the Wage Scale for Groups 2A, 2B, 2C

and 2D in 2022, where the lowest wages for all these groups are in Group 2A and the highest wages are in group 2D. Each of these groups has a wage scale ranging from minimum, medium and maximum wages in accordance with the provisions stipulated therein.

- The certification unit has a worker recruitment document from the start the worker becomes a permanent worker in probation period. For example, a security (RSK) who has recruitment documents such as a job application letter, identity card, family card, recruitment selection results, decree letter accepted to work and undergo probation for 3 months, medical check-up results and others. The worker started working as a probation worker on 14 November 2022 until 14 February 2023 (Employment Agreement No. 005/SPK-PGA/Int/XI/2022 in 10 November 2022).

Since 2022 there has been no change in policy, but what has changed is the decision related to the minimum wage which has changed every year following the government's decision. Regarding the change in the minimum wage decision, it has been routinely submitted annually to workers at the beginning of the year and this is reinforced by the results of interviews with field workers and labor union representatives who are clear about any changes in the minimum wage every year.

The results of interviews with workers (harvesters, sprayers, upkeep and mill operators) and labor union know that workers have a sufficient understanding of their rights (wages, overtime, incentives, deductive, fines, etc.) listed in the Collective Labor Agreement and in accordance with routine socialization provided by the certification unit. Workers' wages in 2022 have been accordance with the minimum wage set by the government and there are no late payments every month, working hours is 40 hour a week with 6 days working in a week and for the overtime has been paid in accordance with applicable regulations.

Based on the foregoing, it can be concluded that the certification unit has procedures and provisions related to wages, work requirements (regular working hours, deductions, overtime, sick leave, vacation rights, maternity leave, etc.) well documented and thoroughly implemented in each unit.

6.2.3

In accordance with the explanation in the previous indicator (6.2.2), the unit of certification already has references/procedures governing regular working hours, deductions, overtime, sick leave, right to holidays, maternity leave, reasons for dismissal, notice period before dismissal, and other employment provisions. This is stated in the Collective Labor Agreement and other documents. The unit of certification has also been able to prove that all of these provisions have been implemented fairly well, including:

- November and December 2022 salary slips for security (KNS), boiler operator (SEF), upkeep (KNM), and upkeep (ERN) have a different based on wage scale structure 2022 and all wages above the minimum wage.
- Overtime payment in November and December 2022 that has been accordance with applicable laws for security (KNS) and boiler operator (SEF).
- List of women workers that has been given maternity leave and pregnant workers in January until December 2022.
- Unit certification has provisions related to deduction / penalty which have been stated in the Collective Labor Agreement and further explanation is set out in an internal memo.
- In the payroll document, there is information that states the results of the worker's wages in one month according to the work performance of each worker. Payroll has also been accurate for each worker, for example the number of days worked in a month, premium payments, fines, deductions from workers' wages and other information that is in accordance with facts in the field.
- Proof of granting annual leave to logistic officer (SRT) on 20 December 2022 for 2 days starting from 26-27 December 2022. The application letter has been known by HR Group and approved by the Estate Manager.
- Proof of granting annual leave to admin worker (RML) on 19 December 2022 for 1 days starting from 24 December 2022. The application letter has been known by HR Group and approved by the Estate Manager.
- Etc.

A review of the November and December 2022 wage document for harvesters, sprayers, upkeep and mill operators proves that the wages received are accordance with the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2022. Based on the description above, the certification unit has demonstrated legal compliance related to working conditions, such as compliance with minimum wage, working hours, overtime, maternity leave and other compliance.

6.2.4

The certification unit has provided welfare facilities to residents in the form of housing, clinics, water supply, drinking water depot, electricity, education (kindergarten until middle school), transportation and other facilities. The results of the field visit in the housing

area revealed that workers were provided with adequate housing facilities with 2 bedrooms, 1 bathroom and there was daycare for children. The house is inhabited by 1 family and specifically for workers who are not married then 1 house will be filled by 2 workers. This is in line with the results of interviews with housing residents stating that the facilities provided by the certification unit are houses, electricity, availability of clean water, transportation of school, kindergarten, elementary and middle school (for high schools located in Capital City of Pasaman Barat Regency), child daycare, places of worship (mosque & church), sport facilities and others. In general, the facilities provided by the certification unit are good / suitable for use by workers and their families. The certification unit has also conducted monitoring for the condition of the feasibility of the facilities provided every year, such as housing that is repaired if there is damage (usually if there is damage the worker will inform it and it will be handled directly by the repair company), the availability of electricity that has been provided by the company in the form of Metan Capture or a generator, and the availability of clean water which is always monitored for its feasibility every 6 months (the results of monitoring clean water in the residential area do not show any test parameters that exceed the threshold).

Based on the results of interviews and document review with the company's management, it is known that currently the company does not have a clinic and is only a First Aid Post affiliated with the PT AMP Plantation Clinic (Wilmar Group). The company also said that the processing of the clinic license had been carried out since 2022 and until now it has completed obtaining technical recommendations for issuing permits from the Health Agency of Pasaman Barat Regency, but the complete document input and approval have not been carried out online and from the Investment and One Stop Service of Pasaman Barat Regency. The following are supporting documents that can be shown by the company during the audit:

- Risk-Based Business Licensing Documents with Standard Certificate No. 27062200414840003 dated 22 August 2022 issued by the Regent of Pasaman Barat (this permit is a permit in the form of OSS).
- Application letter from the Gersindo Minang Plantation Clinic dated September 14, 2022 to the Investment and One Stop Service Agency of Pasaman Barat Regency regarding Application for Submission of a Clinic License. The letter also attaches the documents required for permit application and this has been received by the service on the same date.
- In accordance with the application letter above, on December 7, 2022 the Health Office and the Investment and One Stop Service Agency of Pasaman Barat Regency carried out a Field Verification activity to provide Technical Approval for the Gersindo Minang Plantation Clinic Permit. The result of the verification is that there are still a number of deficiencies which are still being recorded by the verifier team, namely as many as 5 records.
- On December 21, 2022 the company has made improvements to all records found during the verification activity. The company also made Letter No. 01/GMP Clinic/Ext-XII/2022 dated December 21, 2022 concerning Commitment to Fulfill the Requirements for Gersindo Minang Plantation Clinical Medical Devices. The Commitment Letter was also given to the Health Agency of Pasaman Barat Regency on the same date.
- On January 9, 2023 the company has sent evidence and supporting documents (other documents) for clinical licensing requirements to the Health Agency of Pasaman Barat Regency.
- On January 11, 2023, the Health Agency of Pasaman Barat Regency issued Recommendation for Clinic Operational Permit No. 440/107/Dinkes/XI/2022 for the Gersindo Minang Plantation Clinic as an Outpatient Primary Clinic.
- Based on the Clinical Operational Permit Recommendation Letter for the Gersindo Minang Plantation Clinic as an Outpatient Primary Clinic, it has been included in the OSS system for Risk-Based Business Licensing with KBLI Code 86105 for Private Clinic Activities and the statement is "Not Verified".

Based on the explanation above, currently the licensing process is proceeding as it should and has reached the stage of obtaining a Clinical Operational Permit Recommendation. However, inputting this and approval into the OSS system carried out by the Investment and One-Stop Services Agency of Pasaman Agency Regency has not been completed.

This will be confirmed again during the next audit activity related to the progress of obtaining a clinical permit.

6.2.5

Certification unit has made it easier for workers and their families to obtain food sources by providing easy access that sell the daily needs of workers and provide access to vegetable traders to sell in the workers' housing area. In addition, there are also workers who open small business stalls to sell daily necessities in each housing. Based on interviews with workers (harvesters, sprayers, upkeep and mill operators), housing residents, Workers Union and Gender Committee, it is known that workers have no difficulty in getting food sources because the certification unit 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 (only 30 minutes to Regency Capital).

6.2.6

In Indonesia there is no set standard of living wage, so the certification unit still applies the national minimum wage for all workers. In addition to the payment of the minimum wage, the unit of certification has an assessment of the implementation of applicable wages and benefits in kind provided to workers in the unit of certification which are in line with the RSPO Guidelines for Implementing Living Wages.

The certification unit has the determination of assessment prevailing wage and all kind of benefits for Living Wage simulation in 2022. The calculations of prevailing wages refer to RSPO Guidance on Calculating Prevailing Wages (11 November 2019) which included in the calculation of main wage, worker status, housing facility, education, electricity, water sources, healthcare, and others. The results of these calculations it was known that the in kind of benefit that currently given / simulated by the certification unit is 28.37 % to 44.55 % above the stipulation of the minimum wage

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

6.2.7

At the time the ASA-1.4 assessment was carried out, the certification unit no longer had workers with casual daily contract (BHL) or contract workers (PKWT) status. All existing workers are permanent workers with Grade 2A-2D and staff. Based on this, it can be concluded that all permanent work in the certification unit is carried out by permanent workers and there are no more workers with contract or non-permanent status (PKWT/BHL).

Status: Comply

6.3

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

6.3.1

The certification unit have policy concerning on the freedom of association stated in Wilmar International Group NDPE policy against deforestation, peat, and exploitation updated on 15 November 2019. This policy explained that Wilmar Group committed to upholding the rights of workers to freedom of association, collective bargaining, and to form and join labor unions of their choice. In addition, certification unit has a collective labor agreement which states that workers have the right to establish trade unions and become members / leaders of trade unions in accordance with applicable regulations. The information on freedom of association listed in the Collective Labor Agreement was carried out regularly and the last socialization was held on 20 October 2022.

Based on interviews with labor union representatives who explained that the certification unit had given freedom of association and at present labor unions have been formed. The establishment of the union is in accordance with the applicable laws and regulations and has been recorded at the Manpower Office. Currently there are four (4) active labor unions in certification units such as SPSI (*Serikat Pekerja Seluruh Indonesia*) for PHP 1 Estate, SPSI (*Serikat Pekerja Seluruh Indonesia*) for GM Mill, SARBUKSI (*Serikat Buruh Industri Perkebunan Sawit Indonesia*) for GMP Estate and SERBUNDO (*Serikat Buruh Perkebunan Indonesia*) for PHP 2 Estate. Certification unit is giving freedom for worker to express their opinion and also, certification unit did not give any intervention related to labor union activity. Labor union has registered to Manpower Agency of Pasaman Barat Regency for each union.

Based on the explanation above, it can be concluded that the unit of certification has published a statement recognizing freedom of association and the right to collectively bargain in the national language which has been properly understood, understood and implemented.

6.3.2

The certification unit has a list of workers who have joined the union and the last update was carried out in December 2022. In addition to properly documenting the list of members, the certification unit also has records of meetings between labor unions and management representatives as well as with internal unions. The following are examples of records of meetings conducted by labor unions in 2022, namely:

- A bipartite meeting between labor unions and company representatives on 24 January 2022 which discussed related to p

distribution of Collective Labor Agreement pocket books for the 2021-2023 period to all workers along with the procedure.

- A bipartite meeting between labor unions and company representatives on 30 December 2022 which discussed related to labor union evaluation in 2022 and work programs for labor union in 2023.

Based on the results of interviews with labor union representatives and their members who are workers in each unit, it is known that the union holds meetings every month with those accommodated in Bipartite meetings between worker representatives and management representatives. In discussing meetings between workers' union officials and company management, if there are matters that are not resolved in the discussions, a tripartite settlement will be carried out accompanied by the Manpower Agency.

Based on this explanation, it can be concluded that the certification unit has minutes of meetings between the certification unit and trade unions or workers' representatives who are freely chosen by workers, in the national language. And well documented.

6.3.3

The absence of unit certification interference in the selection or operation of labor union activities, this is evidenced by the results of interviews with workers and union representatives stating that in the process of selecting / making decisions and planning activities, members provide input / aspirations to their representatives each to make an election / decision-making and no management has a position as staff / managerial (assistant and above). The employee who currently serves as the Chairman of the Labor Union is Foreman at mill and estate, then there will be no conflict of interest that occurs with the company because there are no workers who have the authority as decision makers (staff class and above). The explanation has reinforced the fact that management did not interfere directly / indirectly with the taking decisions and activities carried out by labor unions.

Based on interviews with labor union representatives who explained that the company had given freedom of association and at present labor unions have been formed. The establishment of the union is in accordance with the applicable laws and regulations and has been recorded at the Manpower Office. Certification unit is giving freedom for worker to express their opinion and also, certification unit did not give any intervention related to labour union activity.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1, 6.4.2, 6.4.3 & 6.4.4

Unit of certification policy towards child labour was issued by Group Plantation Head and Group CSR Head on September 2010. The policy has referred to ILO Convention No. 138. That policy states that it is forbidden to employ child labor and under the age of 18 (eighteen) years, this is evidenced by the Identity Card (KTP) at the time of employee recruitment. The results of the verification of documents revealed that there were no workers under the age of 18. In addition to having a policy governing the minimum age for workers for workers, the certification unit also includes clauses on child protection and prohibitions on hiring workers under the age of 18 in any agreement with the contractor. The policy was socialized to workers on 20 October 2022 and to the contractor when signing the work agreement.

Based on field visits and interviews with workers in the fields of GMP Mill, GMP Estate, PHP 1 Estate and PHP 2 Estate, it is known that the minimum age for work is 18 years, and no workers found below the minimum age specified. This is supported by the results of a review of company and contractor workers' document which proves that there are no workers under the age of 18 at the time of entering work, the youngest age of workers is 18 years when entering work.

Based on the results of the review of the cooperation agreement document with the contractor for examples is CV Dian RP, CV Harapan Jaya and CV Putra Ruslan, it is known that in the agreement has a separate clause to ensure that the contractor does not employ minors (under 18 years old) and complies with the prevailing laws and regulations in Indonesia.

Based on this, it can be concluded that the unit of certification has a policy on child protection including the prohibition of child labor and has been well documented and known to all workers.

Status: Comply

6.5

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

6.5.1, 6.5.2, & 6.5.3

Unit of certification policy towards preventing sexual and other form of harassment and violence is presented in policy concerning on sexual harassment, violence, abuse, and reproductive rights updated in January 2018. This policy applies to all operational areas of Wilmar International Group. Both policy mentioned that employees are obliged to support morality and security in the work place, as well as to avoid any form of dissexual harassment and violence objected to all workers. The policies explain that every worker is entitled to receive protection against sexual harassment in the workplace and Sexual harassment is an offense and if convicted of sexual abuse offenders will be penalized in accordance with applicable regulations. The gender committee & certification unit has socialized to the employees, for example on 20 October 2022 and the representatives of the committee gender are available in each division.

The management has carried out an assessment of the needs of young mothers by asking for their opinions, as well as taking actions to meet the needs that have been identified, which are shown as follows:

- Assessment for New Mothers, on January 2022 in the PT Gersindo Minang Plantation and PT Permata Hijau Pasaman conducted by medical personnel (doctors, midwives and nurses)
- Minutes of the Action Plan Meeting on the Needs of New Mothers After Childbirth at PT Gersindo Minang Plantation and PT Permata Hijau Pasaman, which among other things explain the following:
 - Give permission to mothers who breastfeed while working with an adjusted time.
 - Make a place for breastfeeding in the Childcare ("Pojok ASI") for female employees and make attendance for every mother who breastfeeds as monitoring by management.
 - Analyze the needs of mothers and babies such as daily needs (milk, pampers, baby clothes and other equipment) and their availability in the company's operational environment or in their surroundings (nearby villages with easy and close access).

Based on interviews with female workers and gender committee, the policy had disseminated to workers through socialization with workers and in the last year period, that hasn't any issue/incident related to sexual harassment, violence at work/reproductive rights. Based on the field visit to the housing complex show that to accommodate the needs of new mothers in breastfeeding, breastfeeding corners have been provided in the office area and child care area. The availability of daily needs for mothers and their babies is also very easy to access, namely in shops around the company (there are shops/supermarkets about 15-20 minutes away from workers' housing that provide these needs).

Based on the explanation above, it can be concluded that the certification unit has policies related to preventing harassment, sexual violence, protection of reproductive rights and identifying the needs of new mothers, all of which have been implemented properly and proven according to the results of field observations and interviews with workers.

6.5.4

The certification unit has several procedures that regulate the mechanism for submitting complaints and employee complaints, including:

- Document No. SOP-GEN-021 dated February 1, 2015 regarding internal communication and consultation. The procedure explains that employees and other stakeholders can provide information, ask questions, complaints, dissatisfaction related to industrial relations, descriptions of potential problems, suggestions and audit findings. The head of the work unit will coordinate and accommodate meetings to find solutions to problems, and can ask top management for help for these solutions. The communication and consultation flowchart are also presented in document no. SOP-GEN-021 dated February 1, 2015, which explains the sequence of complaints or submissions of complaints or aspirations until they are handled by the company.
- Document No. SOP-GEN-031 dated 01 May 2015 regarding receipt of complaints and dispute resolution. The procedure states that employees submit complaints or complaints, verbally or in writing to their superiors which are then forwarded to the PGA/LKS Bipartite Officer. In the procedure described that if requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).
- Company Regulation which state that if there is a complaint, it will be resolved by deliberation to reach consensus or discuss it with the direct superior. If this cannot be done by deliberation, it will be resolved through the company leadership with the union management. If there is no agreement, then the settlement is carried out through the assistance of the manpower office.

Based on the results of interviews with representatives of labor union and gender committee it is known that the workers have understood the procedures and mechanisms for submitting complaints/complaints to the company, this is because the company has routinely socialized the procedure by posting warnings/complaints. signposts related to this.

Based on the explanation above, it can be concluded that the certification unit has a complaint mechanism that guarantees the anonymity and protection of the complainant which is known by all levels of workers and has been well documented.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1

The certification unit have policies related to human right is presented in Human Right Policy of Wilmar International, Ltd. which issued by Group Plantation Head and Group CSR Head on June 2014. The policy explains that the certification unit will respect workers' rights in accordance with applicable regulations, such as child labor, forced labor, and elimination of discrimination. The procedures related to human resources management shows that every worker has a work agreement that describe specific job description.

There are no migrant workers who work in the company's operational area. All workers come from within one country (although from various regions). In addition, each worker has been provided with a clear work contract. The rights and obligations of workers are also clearly stated in company regulations, and in work agreements. Based on employee list and observation in field known that there are no migrant workers, forced labor. Every worker has a work agreement that describe specific job description, there is no substitution of contract without prior consultation and agreement from the worker, for example:

- There is no retention for identity, because all labor documents for individuals are in the form of photocopies and not original items such as ID cards, diplomas, family cards and others.
- There is no contract substitution, because all existing contract workers currently work in accordance with existing contracts such as contract workers for maintenance activities only doing maintenance activities and do not employ workers other than those stated in the contract.
- The freedom of workers in resigning, because if the worker wants to resign there is no understanding or prohibition from the company to the worker concerned. This is evidenced by the presence of workers who resigned to move to work and the company gave all their rights as fully resigned workers without any shortcomings.
- There is no coercion in doing overtime work, workers who do overtime at the company can refuse if ordered to do overtime activities because overtime is not the worker's obligation and the company also does not prohibit this.

Based on employee data in December 2021 and interview with workers (mill and estate), most of the workers came from local communities, Javanese, Batak, Minang and another ethnicity. They have the recruitment process in the certification unit and is in accordance with applicable employee acceptance procedures. Based on the results of interviews with workers in plantation and mill, it is known that currently there are no migrant workers, retention of identity, payment recruitment fees, contract substitution, involuntary overtime, lack of freedom of workers to resign, penalty for termination, debt bondage, and withholding. bondage. This is because the certification unit has carried out its operations in accordance with applicable regulations.

There is no significant obstacles related to employment or violations of Collective Labor Agreement. For example, for the harvesters works daily based in 6 days a week and 40 working hours a week. Certification unit provides output targets that can be obtained in less than 7 hours of work. If the harvester obtains more output within or more than 7 working hours, then the harvester will get the harvest premium payment. No penalty is given to the harvester if it does not get output due to natural factors such as rain. Based on payment list on November and December 2022, the harvesters have earned in accordance with the minimum wage.

6.6.2

In accordance with the explanation in indicators 6.2.7 and 6.6.1, where it has been explained that currently the unit of certification no longer has workers with contract status (PKWT or BHL) and migrant workers. Based on this, the unit of certification does not own and carry out implementation related to contract workers and migrant 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

PT PHP

The certification unit shows the document ratifying the OHS committee organizational structure through the Decree of the Head of the

Manpower and Transmigration Office of West Sumatera Province with No. 564/310/UPTDWILII/2021 dated December 29, 2021. The document explains that Zafir Wanto Putra is the secretary of OHS committee. The certification unit in this case shows the following documents:

- a. Decree of the Minister of Manpower of the Republic of Indonesia with No. 5/6155/AS.02.04/IV/2021 dated May 31, 2021 regarding the Appointment of OHS Expert on behalf of Zafir Wanto Putra and valid for 3 years from the date of stipulation.
- b. OHS Expert Authority Card on behalf of Zafir Wanto Putra with No. Reg. 40556/PK3/AJ/14/2021/P0 which is valid until May 31, 2021.

PT GMP

The certification unit shows the document ratifying the OHS committee organizational structure through the Decree of the Head of the Manpower and Transmigration Office of West Sumatera Province with No. 564/306/P2K3/Hi-Was/XI/2022 dated November 17, 2022. The document explains that Rahmadai Ramli is the secretary of OHS committee. The certification unit in this case shows the following documents:

- a. Decree of the Minister of Manpower of the Republic of Indonesia with No. 5/4554/AS.02.04/IV/2021 dated April 27, 2021 regarding the Appointment of OHS Expert on behalf of Rahmadai Ramli and valid for 3 years from the date of stipulation.
- b. OHS Expert Authority Card on behalf of Rahmadai Ramli with No. Reg. 6588/PK3/AJ/13/2021/P1 which is valid until April 17, 2024.

Based on interview result with Manpower Agency of Pasaman Barat District, revealed that the management unit has submitted the the manpower report and OHS report every 3 months. The guiding committee for occupational health and safety report covers the entire occupational health and safety activity within company's operation activity

6.7.2

Company has emergency facilities and infrastructure such as fire extinguisher, first aid kit, hydrant, water tank, and other supporting equipment. Based on field observation in emplacement for e.g. known that hydrant is functioned properly and the fire extinguishers there check and monitored every month (checklist of inspection provided in each fire extinguisher), also it is known that the contents of first aid box are available as determined by the company.

Based on the results of field visits at Mill and Offices, it is known that the company has completed signs for evacuation routes and assembly points in case of an emergency. In addition, based on the results of field visits in GMP Mill, GMP Estate, PHP1 Estate and PHP2 Estate, it is known that the foreman has been equipped with first aid kits and has understood how to use them.

However, based on the results of field observations in the Estate and Mill areas, it is known that the company has installed OHS symbols, has fire extinguishers, installed MSDS, and has hydrants in strategic locations according to the level of danger. During the audit process the auditor team assesses that the company is encouraged to improve performance such as:

- More informative OHS signs/symbols not limited to symbols only
- MSDS is placed in a place that is easy to read (not too high)
- SOP / Policy in a more informative form that attracts employees' attention
- Fire extinguishers are placed in a place that is more easily accessible (**OFI**)

6.7.3

The certification unit already has SOP for Personal Protective Equipment. The SOP explains the PPE standards for each job starting from harvesting, spraying, fertilizing, heavy equipment operators, loading FFB, mechanics, welders, manual maintenance, field staff, civil engineering, gardeners, foremen, warehouse officers, generator operators, solar tank activity, etc.

The company can show the minutes of the handover of PPE where PPE is given 2 times per year. Based on the results of interviews with workers at GMP Mill, GMP Estate, PHP1 Estate and PHP2 Estate, it is known that workers have been equipped with PPE which is provided free of charge.

Based on field observation in rinse area in GMP and PHP Estate, it is known that company has provided sanitation facilities that can be used by workers to clean themselves, change clothes and store work tools.

6.7.4

The company already has a list of employees which also includes *BPJS* Ketenagakerjaan and *Kesehatan* participant numbers for a

total of 1.059 employees (GMP Mill, GMP Estate, PHP 1 Estate and PHP 2 Estate). This number does not include the number of workers with staff status and above. Based on a review of the company's employee list documents for December 2022 and proof of payment for *BPJS Ketenagakerjaan* and *Kesehatan* for the same period, it is known that the company has registered and paid all of its employees in the *BPJS Ketenagakerjaan* and *Kesehatan* programs, which consist of Work Accident Insurance (*JKK*), Death Insurance (*JKM*), Old Age Security Insurance (*JHT*) and Pension Guarantee/Insurance (*JP*) via Bank Transfer, with proof of payment as follows:

- Proof of payment for *BPJS Ketenagakerjaan* for PT Gersindo Minang Plantation on the December 2022 period which was paid for a total of 113 workers (GMP Mill) and 623 workers (GMP Estate) on 13 January 2023 via bank transfer.
- Proof of payment *BPJS Kesehatan* for PT Gersindo Minang Plantation on the December 2022 period which has been paid for a total of 113 workers (GMP Mill) and 623 workers (GMP Estate) on 09 December 2022 via bank transfer.
- Proof of payment for *BPJS Ketenagakerjaan* for PT Permata Hijau Pasaman on the December 2022 period which was paid for a total of 323 workers (PHP 1 and PHP 2 Estate) on 13 January 2023 via bank transfer.
- Proof of payment *BPJS Kesehatan* for PT Permata Hijau Pasaman on the December 2022 period which was paid for a total of 323 workers (PHP 1 and PHP 2 Estate) on 09 December 2022 via bank transfer.

Based on the results of interviews with union structure as well as workers in plantations and factories, it is known that the unit of certification has provided health insurance to workers and their families (wives and children) and employment guarantees to all workers. Based on interview with contractor workers and representative, it is known that the accident insurance for contractor's workers is covered by the head of contractor itself. Regarding the processing of claims for work accidents that occurred in the certification unit, during 2022 (January-December), the certification unit has sent a complete work accident report (KK1-KK4 and supporting documents) as a requirement for submitting claims to *BPJS Ketenagakerjaan* and for submission of the final claim submitted on April 20 2022 for a total of 3 claims processes (2 claims at PT Gersindo Minang Plantation and 1 claim at PT Permata Hijau Pasaman). Currently, the entire claim process has been completed and it can be shown that claims that have been completed have been given to workers.

Based on the foregoing, it can be concluded that the company already has a list of employees participating in the *BPJS Ketenagakerjaan* and *Kesehatan* program along with proof of payment every month.

6.7.5

The company has recorded the number of work accidents and the number of days lost in each unit which total 23 cases, for example LTA for GMP Mill period January – December 2022 with the number of work accidents as much as 5 times and the number of days lost as much as 42 days where the company has calculated the Fatality Rate and Severity Rate.

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 certification unit has procedures related to Pest and Disease monitoring. The procedure setting up an early warning system is routine enumeration of potential pests and diseases, with emphasis on mechanical and biological control, such as planting beneficial plants (*Turnera subulata*, *Cassia cobanensis*, and *Antigonon leptosus*) to anticipate fire caterpillars, as well as installation and monitoring of barn owl box to anticipate rat attacks. The procedure also sets an economic threshold for each pest and disease, that chemical control is only carried out if the attack is above the economic threshold.

Based on document review and interviews with the person in charge of IPM, it is known that the pest and disease census is carried out regularly every month. If the census results show pest and disease attacks above 5%, it will be continued with chemical control according to R&D recommendations.

7.1.2

The certification unit explained that biological control of leaf eating caterpillar uses beneficial plants such as *Turnera subulata*, *Casia cobanensis*, *Antigonon Leptosus*, and *Turnera ulmifolia*. *Turnera ulmifolia* has been identified by the certification unit as an invasive

species according to LHK Ministerial Regulation No.P. 94/MENLHK/SEKJEN/KUM.1/12/2016, and control measures have been carried out with regular maintenance.

Based on the results of a field visit to Fase 3 Block 67, PHP2 Estate found that the company only planted beneficial plants such as *Turnera* and *Antigonon* where the growth and distribution were controlled by the company.

7.1.3

Based on interviews with management representatives, field workers and the surrounding community, there is no indication of the use of fire materials for pest control. From the results of field observations at GMP and PHP there were no indications of burning. The company also does not use certain species to control pests and diseases. Pest and disease control is only carried out by biological and chemical methods.

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 certification unit already has a justification for pesticide application in the form List of Agrochemical Recommendation 2022 for controlling weeds, pests and diseases in palm oil plantations, for example weed *Stenochlaena palustris* with the active ingredient glyphosate.

7.2.2

The company shows documents on monthly use of pesticides for each estate, for example the use of Supremo (Isopropyl amine glyphosate) in PHP1 in October 2022 with a total application area of 212.17 Ha, total use of 398.4 liters, pesticide dose of 1.87/ha, LD50 > 5000 mg/kg, the total active ingredients used were 191,208 grams, the active ingredients were 898.91 per Ha.

7.2.3

The company has minimized the use of pesticides with the EWS method, census and if the census results exceed the threshold, chemical control is carried out. Besides that, based on the results of a field visit in block 121 div 2 PHP1, *Turnera subulata* and *Tyto alba*. In addition, the results of a field visit in block 2FG phase I PHP1 found a pheromone trap used to control *Oryctes*.

Companies can show documents of chemicals used of Supremo (*Isopropyl amine glyphosate*) during the period 2020 is 15,663.23 liters and 2022 is 12,031.38 liters.

7.2.4

To avoid the emergence of resistance in target species are done such as the rotation of pesticide use. There is no Prophylactic usage of pesticide. Based on interview with management representative the economic threshold of 5% according to the procedure is being implemented. The company is currently optimizing the usage of *Turnera* and *Antigonon* to tackle caterpillar pest and pheromone trap used to control *Oryctes*.

7.2.5

The certification unit does not use WHO class 1A and 1B pesticides, or is included in the Stockholm convention ratified in Law No. 19 of 2009, and does not use paraquat. For example, the use of pesticides in PHP with the active ingredient Isopropil amina glifosat (WHO class 3 = broad leaf weed).

7.2.6

The certification unit has conducted training for workers related to pesticides, for example the socialization carried out in GMP Estate regarding safety work using pesticides and MSDS to spray workers on August 06, 2022. Based on interviews with spray workers in block 15B phase II PHP1 Estate known that the workers had been routinely given training on the use of pesticides by the company.

7.2.7

From the results of observation in housing area at GMP Estate, PHP1 Estate and PHP2 Estate found that there were no traces of chemical packaging used as water reservoirs or other housing activities. In the storage area for hazardous waste in each estate, it is also known that pesticide storage areas are well managed and recorded according to their type and hazard, this result are in line with

the documents review, in the form of waste manifests and log book.

Based on interviews with employees and the foreman of pesticide application, it is known that all pesticide packaging is collected at the designated storage area and then will be given to licensed waste parties and not be used for purposes other than pesticide application activities.

7.2.8

The certification unit has procedures related to hazardous waste management including pesticide waste which are contained in the several document, there are;

- SOP for Hazardous and Toxic Waste Management No. SOP-EHS-006 rev.03 dated 4 November 2021 which was approved by the General Estate Manager. The SOP describes the mechanism for storing pesticides in a special warehouse, including a place for mixing pesticide ingredients to be used in the field in a special isolated place so that there is no potential for exposure to chemicals outside the warehouse. Storage of used pesticide packaging is stored in a temporary storage area for hazardous waste and then sent to a licensed parties.
- SOP for Pesticide Use No. PRO-EST-006 rev. 00 dated 01 October 2011. All waste water management activities used for washing fertilizer sacks or used agrochemical packaging are carried out in special washing places in each estate and carried out by appointed officers, besides that used water from washing waste packs can be reused for mixing the next chemical. After washing activities, the packaging is stored, counted, recorded and there is evidence of periodic monitoring and the amount is accumulated.
- Socialization of the prohibition the use of hazardous and toxic waste packaging, for example on the date June 08, 2022.

From the results of observation in housing area at GMP Estate and PHP I Estate, it was found that there were no traces of chemical packaging used as water reservoirs or other purposes in housing activities. In the storage area for hazardous waste in each estate, it is also known that pesticide storage areas are well managed and recorded according to their type and hazard, this result are in line with the documents review, in the form of waste manifests and log book.

Based on interviews with agrochemical storage operator, it is known that all pesticide packaging is collected at the designated storage area and then will be given to licensed waste parties and not be used for purposes other than pesticide application activities.

7.2.9

Based on the results of a document review and interview with spraying workers, it is known that the company does not apply the application of air spraying.

7.2.10;7.2.11

The certification unit has conducted a special medical examination (cholinesterase) for pesticide and manuring operators and is carried out annually at Awal Bros Hospital. The 2022 inspection has been carried out based on the report in Ocotober 2022. For example, cholinesterase examination for 23 workers PHP1 Estate on October 2, 2022 which was carried out by the Awal Bros Hospital laboratory where there were results of examination of 2 workers who exceeded the threshold so that the workers were transferred to jobs that were not related to chemicals according to the work transfer decree on November 5, 2022. Then on December 8 2022, another cholinesterase examination was carried out for that worker with normal results

Based on interviews with several female spraying worker, it was found that there were no pregnant or lactating female who worked with pesticides. However, the certification unit conducts pregnancy tests and examinations every two month to ensure that none of the chemical workers are pregnant. The auditor further obtained information that the personnel had understood that female personnel could not work with chemicals if they were pregnant or breastfeeding. In addition, based on interviews with pesticide and manuring workers, it is known that they have never had a work accident caused by chemicals such as irritants.

Status: Comply

7.3

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

7.3.1

Unit of certification already identified the waste contained in the Waste Identification and Waste Management Plan 2022 documents based on PP number 22 of 2021 that made by each unit has SOPs (FRM-EHS-036). Also has procedure to managing waste generated which are contained in the document such as;

- SOP for Hazardous and Toxic Waste Management Number PRO-EHS-006 Revision 03 dated 4 November 2021 which was approved by the General Estate Manager.
- SOP for Waste Management Number PRO-EHS-004 Revision 03 dated 4 November 2021 which was approved by the General Estate Manager.
- SOP for Washing Used Poisoned Storage and Used Fertilizer and Waste Water Management Number SOP-EHS-016 Revision 00 dated 01 October 2011.
- SOP for Pesticide Use Number PRO-EST-006 Revision 00 dated 01 October 2011.

Hazardous and Toxic waste

Unit certification has a temporary storage permit for hazardous and toxic waste for each unit, there are;

- **GMP POM and Estate**

Document permit for temporary storage of hazardous waste by *DPMP TSP* Pasaman Barat Regency with No. 503/02/IPLB3/DPMP TSP/VII-2020 on July 30, 2020 and is valid for 5 (five) years.

- **PHP I Estate**

Document permit for temporary storage of hazardous waste by Decree of the Regent of Pasaman Barat No. 188.45/236/BUP-PASBAR/2018 April 25, 2018, and is valid for 5 (five) years.

- **PHP II Estate**

Document permit for temporary storage of hazardous waste by Decree of the Regent of Pasaman Barat No. 188.45/632/BUP-PASBAR/2017 dated 13 October 2017, and is valid for 5 (five) years. This permit is still on process for extension at the Ministry of Environment and Forestry, with proof of email dated January 18, 2023, in the verification stage.

Based on this permit, it is known that the types of hazardous and toxic waste that are allowed to be stored are used oil, used filters, used batteries, pesticide packaging, spillkit waste, used cartridges, LED lamps, and clinical waste.

Based on observations of the GMP Estate, PHP I, and PHP II temporary hazardous waste storage, it is known that the building has been equipped with an emergency response such as fire extinguisher, first aid kit, eye wash, shower, hazardous waste symbol and label, also waste placement according to the type and characteristics. In addition, there is also a logbook to record. Hazardous waste also handled properly by disposed based on each toxicity and hazardous characteristics, such as medical waste which is classified as infectious. Unit of certification also reported periodically to Environmental Agency of Pasaman Barat Regency for example on periode Q4 year 2022 dated 12 January 2023 with document No. 07/GMP/II/2023.

In the management, utilization and/or processing of waste unit of certification collaborated with licensed parties, which is carried out regularly every 6 months named PT Shali Riau Lestari (PT SRL) with contract agreement No. 004/SRL-PKU/MOU/III/2022 for PT GMP and No. 057/SRL-PKU/MOU/XI/2022 for PT PHP. Each units has recorded well so that waste can be easily traced, both in the log book, balance sheet, and manifest.

Solid Waste

The solid waste produced by the company is shell, fiber and empty fruit bunch. The management plan is carried out by reusing solid waste such as shells and fiber to be reused as boiler fuel. Meanwhile, solid waste such as EFB is reused by applying it to plantation areas. Solid waste utilization data is explained in more detail in indicator 7.9.1.

Liquid Waste (POME)

Liquid waste generated from the factory is reused for Land Applications (LA). Before being channeled to LA, the liquid waste is first managed at the WWTP with the aim that the quality of the liquid waste flowing to LA is in accordance with the provisions. The results from POME processing are also used for methane gas in the biogas plant which is fully used for the CPO production process.

Domestic Waste

Domestic waste generated from housing and offices will be disposed of in Landfills for organic and an-organic waste. Based on the results of field visits to the GMP Estate, PHP I, and PHP II housing areas, there are no traces of burning waste.

7.3.2

Unit of certification already has a document on the results of monitoring the implementation of hazardous and toxic waste management

procedures according to PP No. 22 of 2021 which is contained in several documents, including:

- Document of hazardous waste source identification results for the 2022 period which provides information regarding the sources of hazardous and toxic waste that have been identified by the company, either from the estates or from the mill.
- Balance Sheet and Logbook for period January-December 2022 which showed waste recorded in accordance with the type, characteristics, time it is produced and the delivery to waste processors, and it is obligatory to submit an official report to the relevant government agency.
- Conducting socialization of hazardous and toxic waste management to employees.
- OHS Completeness Monitoring Document for the period 2022 which informs the condition and completeness of emergency response facilities in storage areas, such as first aid kits, eye wash and shower checks, fire extinguishers, spill kits, and alarms. The monitoring results show that all equipment is in good condition and in accordance with company SOPs.

From the results of the document review by comparing the balance sheet and logbook, it can be seen that the submission of waste to storage for PT GMP was done in 27 September 2022 and PT PHP 13 October 2022 was appropriate and there was no difference in the amount submitted.

Unit of certification already has Waste Management SOP No. PRO-EHS-004 which explains that hazardous waste must be collected separately from domestic waste. Then it is transported and collected to the hazardous temporary storage to be handed over to a collection company that already has a permit. This procedure has been disseminated to employees on a regular basis

During the audit process the auditor team conducted interviews with several workers whose work locations produced hazardous waste, but there were some workers who had not been able to explain in detail regarding the management of the waste produced. Unit of certification has opportunity for improvement to ensure the evaluation and effectiveness of socializing waste management to employees, especially for employees working in work areas that produce hazardous waste. (OFI)

7.3.3

Unit certification does not use open burning for waste disposal. It can be proven through document review and management interviews, that the company has a Waste Management Procedure document with No. PRO-EHS-004 rev. 03. The scope of this procedure is for mill, estates, housing, and offices as a reference for handling agrochemical waste including used pesticide packaging, palm fronds, liquid waste, empty bunch fruit, solid decanter waste, hazardous waste, household (domestic) and office waste.

Waste management applied based on Willmar Environmental policy to apply the Zero burning principle of plantation development and waste disposal, except in special conditions as stated in the ASEAN Guidelines for its activities.

It is also proven through the waste transportation manifest and the results of observations in housing area GMP Estate and PHP 2 Estate that there were no traces of burning activities. Interviews with employees who live in the housing estate also stated that they had never burned waste due company commitment and domestic waste in the housing is transported twice a week and properly managed in landfills, so that no accumulated waste is burned.

	Status: Comply
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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 certification unit can show procedures regarding fertilization No: SOP-EST-001 effective December 18, 2015, namely activities to provide nutrients for plants, in this case fertilization with chemicals with the aim of providing nutrients for plants to produce good FFB production.

Records of implementation of best cultivation practices that have been carried out by the certification unit include records of soil and leaf analysis activities and nutrient recycling strategies as regulated in the procedure for managing soil fertility.

Based on field observation and interview with Fertilizer Applicators, known that the applicators were able to explained and demonstrate several technical implementation such as time of application, macro and micro nutrient fertilizer placement, prohibited areas to be applied with fertilizer (i.e. conservation and riparian areas) and PPE used.

7.4.2

The unit of certification has shown documentation of soil and leaf sampling which can be detailed as follows:

1. Soil Analysis

The company shows soil analysis data conducted by the Soil, Plant, Fertilizer and Water Laboratory, Agricultural Research and Development Agency, South Solok Regency, West Sumatra on September 16 2020 with the parameters Texture, acidity (pH), content of C, N, P, K, Mg, Ca, Na, Mg, Pb, Cu, Zn, Cd.

2. Leaf Analysis

Leaf analysis is carried out annually. For example, PT PHP1 and PHP2 in 2022 was carried out based on the Foliar Analysis Report dated 23 May – 11 June 2022 by Laboratorium EMU R&D Wilmar International plantation. The parameters tested consisted of macro elements (N, P, K Mg, Ca) and micro elements (B, Cu and Zn).

Leaf analysis is carried out annually. For example, GMP in 2022 was carried out based on the Foliar Analysis Report dated 23 May – 11 June 2022 by Laboratorium EMU R&D Wilmar International plantation. The parameters tested consisted of macro elements (N, P, K Mg, Ca) and micro elements (B, Cu and Zn).

7.4.3

Based on a field visit to block 2B phase I of GMP Estate, known that the company had applied EFB with dose of 300 kg/palm/year or the equivalent of 40 tonnes/ha/year.

Companies can demonstrate EFB applications in GMP and PHP in 2022, for example:

- EFB applications for the period January - December 2022 at GMP Estate totaling 56,794,319 tons
- Liquid waste application for the December 2022 period at the GMP Estate was 37,548 M³

7.4.4

The company shows records of fertilizer use in 2022 for GMP Estate and PHP1 Estate and PHP2 Estate, for example fertilizer use in GMP Estate as follows:

- NPK 7 6 34 TE with a total recommendation is 223,460 kg and realization until December 2022 is 223,500 kg
- Kieserite with a total recommendation is 10,780 kg and realization until December 2022 is 10,800 kg.

In additions, the company shows fertilizer recommendations for 2022 based on soil and leaf analysis, for example the GMP Estate fertilizer recommendation for the borate type in block 101 of the 2016 planting year at a dose of 150 grams per palm.

Status: Comply

7.5

Practices minimize and control erosion and degradation of soils.

7.5.1

The certification unit can show maps of the distribution of marginal soils such as mineral soils, peat soils, and topography. The map is available with sufficient scale and legend. Marginal soil map prepared by Parama Agricultural Soil Survey (M) SDN. BHD dated May 2008. The details of the distribution of the land distribution map for each division can be explained as follows:

- GMP Estate
The certification unit has a soil type distribution map (Soil Map) with a scale of 1: 30,000 available in its working area consisting of mineral soils (56.4%) and peat soils (44.4%). The map also explains the depth of the peat, namely; peat with a depth of less than 1 meter, covering an area of 274.2 Ha or 6.6% and peat with a depth of 150 - 300 cm with an area of 1,497.2 Ha or 37.2%.
- PHP-1 Estate
Mineral soils (28.6%) and peat soils (72.4%), depth of peat less than 1 m covering an area of 16.3 Ha (1%), depth 150 - 300 cm covering an area of 1,204.8 Ha (71.2%).
- PHP-2 Estate

A map of the distribution of soil types available in the working area consists of mineral soils (78.1%) and peat soils (21.9%). The map also explains the depth of the peat, namely; peat with a depth of 150 - 300 cm with an area of 189.3 Ha or 21.8%.

7.5.2

Based on document verification show that the certification unit has replanted since 1996-2021 with a total area of 4.711,34 Ha. Replanting is carried out on peat and mineral areas but not on areas with steep slopes.

<p>7.5.3 Based on the document verification of area statement revealed that the certification unit was not carrying out new planting activities. The last new planting was carried out in 1998 with an area of 43.62 Ha located in PHP-2 Estate which is in the estate consists of mineral soils (78.1%) and peat soils (21.9%).</p>	<p>Status: Comply</p>	
<p>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.</p>		
<p>7.6.1 The certification unit can show document No. SOP-EST-008 which was issued on 01 October 2012 regarding the proper management and monitoring of peat soils for oil palm cultivation, this procedure was prepared as a guideline for the appropriate and appropriate peat soil management and monitoring system for the company. The document also states that the water level from the ground level must be maintained between 50 and 75 cm, whereas the lowest water level (75 cm) is during the dry season.</p> <p>7.6.2 and 7.6.3 Based on verification document, interviews with management and field observations at GMP and PHP, it is known that there are plantings in peat areas. For peat areas, it is known that the management carried out by the water management, such as the construction of bund off/permanent dams. In addition, measurements of water level and peat soil subsidence are also carried out on a regular basis.</p>		
<p>Status: Comply</p>		
<p>7.7 No new planting on peat, regardless of depth after November 15th, 2018 and all peatlands are managed responsibly.</p>		
<p>7.7.1. – 7.7.7 The company shows peats inventory as of December 2022, it is known that in Region 1 of Sumatera there is total area of 6,272.32 Ha. Peat planted area of 1,592.93 Ha, Buildings and infrastructure covering an area of 322.39 Ha and HCV/HCS covering an area of 0.74 Ha. The document also explains that Peat in Region 1 of Sumatera is at PT DLI and PT PMJ. Thus according to the peat inventory and with reference to the overlay between PIPPIB (Indicative Map for Delaying New Permits) and the operational areas of PT GMP and PT PHP it is stated that there is no peat. The document was submitted to RSPO on 21 December 2022.</p> <p>However, based on the results of field visits in GMP Estate, PHP1 Estate and PHP 2 Estate, the company continues to carry out soils management such as water level to measure the water level in the ditch, monitoring of subsidence for areas that indicate as peat, and piezometer for observing ground water level.</p>		
<p>Status: Comply</p>		
<p>7.8 Practices maintain the quality and availability of surface and ground water</p>		
<p>7.8.1 The certification unit has a water management plan that is implemented to support efficient use of water sources and continuous availability, through operational procedure documents to Control River Boundary Management Plan - Riparian Belt with document SOP-GEN-018 dated November 04, 2021. To avoid negative impacts on other users in the water catchment area, the company carried out activities, including: prohibiting the planting of oil palm on the river border with a width of 50-100 meters left and right, prohibiting land cultivation on the river border by installing notice boards, constructing boundary roads in managed areas, cultivation without spraying around the river, and manual maintenance.</p> <p>Geographically, PT GMP-PHP is located between Batang Pasaman River and Batang Alin River. Unit of certification has a surface water quality monitoring program contained in the <i>RKL-RPL</i> matrix and management which is managed and reported periodically. The monitoring results on river water quality with standard of PP No. 22, 2021, and groundwater quality with standard of Permenkes RI No. 32, 2017 it is known that all parameters are still in the applicable quality standards. Testing is carried out by laboratories that have been accredited by KAN.</p> <p>Several management activities have been carried out by the company to avoid negative impacts on other users in the water sources area, including:</p>		

- Establishment of a riparian buffer zone/river border area with a width of 50 meters and make the area an HCV area
- Enrichment of plant species in river riparian areas, to restore the natural function of the river.
- Not replanting at the 100 meter boundary from the riverbank and marking yellow paint as the limit area for chemical application and conducting routine monitoring to replace or repair damaged marks
- Conduct socialization to the community, employees and contractors in the company area
- Installing information boards for activities limited to HCV areas, such as; prohibition of burning, hunting and maintaining cleanliness
- Periodic monitoring of river riparian areas
- Planting of plant species in the riparian areas of the River in GMP and PHP-2 such as *Bamboo, Mahogany, Sengon, Trembesi, Durian, Salam*, etc.

The results of interviews with resident in emplacement in GMP and PHP workers revealed that there were no problem with availability of clean water, water was obtained from osmosis water station that can be accessed easily, with the criteria of being odorless, colorless, and tasteless. From interview with representatives of Tanjung Pangkal Villages there are no pollute from river water, water is used by the community only for sanitary needs purposes only.

It can be concluded that there is access to clean water for workers and nearby villages, the certification unit carries out water management by monitoring water quality standards on a regular basis, to ensure that there is no contamination of the water used as a result of the activities of the certification unit, and as an efforts of sustainable management of water resources.

7.8.2

The protection of water resources carried out at PT GMP-PHP focuses on river riparian which are also identified as HCV 4 areas. Efforts to protect river banks refer to SOP for River Riparian Management (Riparian Belt) Number SOP-GEN-018 revision 02 dated 4 November 2021 which was ratified by General Estate Manager. The SOP describes:

- Identification of water sources is carried out through 2 methods, namely identification of underground water sources, carried out by local unit management and identification of surface water sources, carried out during the assessment of High Conservation Value (HCV)
- Management of water sources by maintaining the cleanliness of the environment around water sources so that pollutant sources can be minimized.
- Maintenance of water sources by creating areas free from the application of chemicals on the banks of rivers and reservoirs by determining the width of the riparian areas as wide as 100 meters

The company has documents for water management and maintenance of water sources for the 2022 period, which include:

1. Report on the Implementation of the Environmental Management and Monitoring Plan (*RKL-RKL*) which contains surface water protection program of Batang Pasaman River and Batang Alin River which is conducted every semester.
2. Report on the Implementation of HCV Management and Monitoring which contains the management of the Batang Pasaman River and Batang Alin River. For example, based on the HCV area management and monitoring report, the following activities have been carried out:
 - Setting boundaries with HCV with a red cross on oil palm trees as high as 50-100 meters and creating "spray area boundaries".
 - Installation of HCV boundary markers in riparian areas
 - Prohibition of applying chemical fertilizers to riparian area that have been designated as HCV. Palm trees that are in the "spray area boundary" are maintained manually
 - Planting vertiver grass to avoid high erosion
 - Conducting direct socialization to workers and villages around the plantations
 - Installing attributes, warnings and posters in HCV areas, as a means of indirect outreach.
 - Involve the community if there is an environmental conservation program that requires the attention of the local community

Based on the results of field observations in the conservation area, the Batang Pasaman River Blocks 153, and the Batang Alin River Block 8B have been equipped with spray boundary signs, protected area area boards, and planted with vertiver grass in in order to erosion-preventing on riparian area

7.8.3

Management of POME from oil palm processing from the Pelakar Mill with totaling 9 waste ponds a singlefeeding system with total volume capacity 111.000 m³. At the time of assessment 1.4, only the first and fifth pools were activated, because there was a plan to drain oil from the ponds. Before being used, the liquid waste is processed until it reaches the standard for wastewater utilization in oil palm plantations, with pH 6-9 and BOD 5000 mg/l. POME is managed in accordance with applicable national regulations, according KepmenLH No. 29 of 2003 regarding Technical Guidelines for Assessment of Wastewater Utilization from Palm Oil. Wastewater from the WWTP pond outlet is then pumped and used as a designated location for the use of waste water on the ground (Land Application).

The company already has a permit for the utilization of POME for Land Application (LA) from the authorized agency in the form of *DPMPPTSP* of Pasaman Barat Regency No. 503/02/LA/DPMPPTSP/XII-2019, dated 03 December 2019, valid for 5 (five) years. The liquid waste permit is used to irrigate an area of 209.01 Ha in blocks 127, 128, 129, 147 and 148 and a control area of 43.43 Ha in block 146.

The company can show documents regarding the results of the measurement of the quality of POME, namely the POME Report per quarter and the RKL-RPL Implementation Report per semester which includes the results of the measurement of the quality of POME every month and land application monitoring well. The test is carried out by the Laboratory which has been accredited by KAN (LP-1247-IDN). Based on the analysis of the test document, it shows that all the parameters tested are in accordance with the applicable quality standards (especially for pH and BOD) and for waste water utilization to be applied to land its does not cause pollution to the environment. Based on field observation in LA Block 28B, there is no indication of a leak in the channel, the officer can carry out the procedure properly.

Based on interviews with people from the villages around the company, they stated that there was no pollution from the liquid waste produced by the company, this was also because the WWTP was in the middle of the estates.

7.8.4

Unit of Certification already has a utilization permit based on the *Decree of the Governor of West Sumatra* No. 570/1119-Periz/DPM&PTSP/BI/2021 dated 8 Juni 2021 which is valid for 5 years from the date. It is explained in the permit that the maximum quota for water intake discharge is **65,000 m³/month** taken from 1 intake location at Batang Pasaman River, Pasaman Barat Regency, West Sumatera Province.

The water usage for FFB processing has been monitored and documented. The document of water usage for FFB process in period of January – December 2022 shown that the water usage ratio in the range of 14,379.41 m³/month, while for the total use of water (with total of domestic usage) that is equal to **51,588.83 m³/month**. This range is still in accordance with the water quotas that can be utilized specified in the permit and budget determined by the company itself. The unit certification also paid of water usage retribution every month for the entire scope of certification to UPT DIPENDA Pasaman Barat Regency, West Sumatrera Province.

From the results of management interviews and field observations to Water Treatment Plan (WTP) in GMP POM, found that flowmeter used is still functioning properly, so the amount of water used everyday are recorded well, the officer responsible for WTP is understanding about how the to operate WTP cording to procedure.

Status: Comply

7.9

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

7.9.1

The unit of certification using of fossil fuels to increase the efficiency and to optimize monitored and renewable energy. This can be proven by recording documents on the application of the use of shells and fiber from the rest of the mill production process as renewable fuel for boiler purposes in 2022, also the usage of methane gas from POME processing to produce electricity at the Methane Capture Plant installation.

Based on the results of interviews and document verification, it shows that all solid waste in the form of shells and fiber is used to substitute diesel fuel, and biogas for renewable energy, this utilized and the usage data recorded in detail and traceable for the period 2022. From data shows, it is known that the company has saved 77.49% of diesel fuel, of the total diesel that should have been used as evidence of energy efficiency produced from use of renewable energy.

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

Status: Comply

7.10

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

7.10.1

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

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

Reduction of fossil fuels at Gersindo POM has been implemented by using fiber and shells. The company also uses POME with test results from the monitoring, showing that all wastewater testing parameters have met the applicable quality standards. Based on the review of documents for example: monitoring of pesticide use, monitoring of diesel fuel, identification of HCVs and others it is found that accurate data have been entered into the RSPO palm oil GHG Calculator. GHG calculation using palm GHG Calculator 4.0. The summary of GHG emissions for the period January - December 2022, is listed as follows:

Summary Emissions

Description	Value	Unit	Description	Value	Unit
CPO	1.87	tCO ₂ e/tProduct	Oil palm planted on mineral soil	5480.11	Ha
PK	1.87	tCO ₂ e/tProduct	Oil palm planted area on peat	0.00	Ha
PKO	0.00	tCO ₂ e/tProduct	Total oil palm planted area	5480.11	Ha
PKE	0.00	tCO ₂ e/tProduct	Conservation area (Forested)	0.00	Ha
OER	18.17	%	Conservation area (non-Forested)	125.56	Ha
KER	4.06	%	FFB Production per hectare	48.69	t/ha

Mill Emissions and Credits & Emissions from Palm Kernel Crusher

Mill Emissions and Credits			Emissions from Palm Kernel Crusher	
Emission Source and Credits	tCO ₂	tCO ₂ e/t FFB	Emission Source	tCO ₂ e
POME	6851.10	0.03	PK from own mill	0.00
Fuel Consumption	206.55	0.00	PK from other sources	0.00
Grid Electricity Utilization	0.00	0.00	Fuel Consumption	0.00
Export of Excess Electricity to Housing & Grid	0.00	0.00	Total Crusher Emissions	0.00
Sale of PKS	-18309.59	-0.07		
Sale of EFB	0.00	0.00		
Total	-11151.93	0.04		

Estate / Plantation Field Emissions and Sinks

Description	Emission (tCO ₂ e)			TOTAL
	Own	Group	3rd Party	
Emission Source				
Land Conversion	44755.58	3.01	0.00	44758.59

CO2 Emissions from Fertilizer	3698.32	0.11	0.00	3698.43
N2O Emissions from Peat	0.00	0.00	0.00	0.00
N2O Emissions from Fertilizer	2176.46	0.11	0.00	2176.58
Fuel Consumption	793.55	0.08	0.00	793.64
Peat Oxidation	0.00	0.00	0.00	0.00
Sinks				
Crop Sequestration	-34154.43	-2.12	0.00	-34156.55
Sequestration in Conservation Area	0.00	0.00	0.00	0.00
Total	17269.49	1.19	97311.35	114582.03

Palm Oli Mill Effluent Treatment

POME Treatment	Unit	Value
POME Diverted to Compost	%	0
POME Diverted to anaerobic digestion	%	100
• POME to anaerobic pond	%	10
• POME to methane capture (flaring)	%	78
• POME to methane capture (electricity generation)	%	12

*POME is processed in WWTP and Methane Capture

In the GHG calculation, there is an excess of HCV area because it includes supply based which is not included in the unit of certification. While 57.96 ha is the HCV area for unit of certification (PT GMP, PHP 1, and PHP 2).

7.10.2

Unit of certification did not carry out new developments above 2014 in the operational area, but the company still manages GHG by taking an inventory of emission sources. They can show identification documents of activities that generate emissions for the period 2022 for Mills and Plantations. This is done to estimate carbon stocks in the management area and potential sources of emissions that can occur directly due to the management. A plan to minimize these emissions is drawn up and implemented, for example are;

- Using of renewable fuels in the form of shells, fiber and EFB as a substitute for diesel
- Performing maintenance on operational equipment such as boilers on a regular basis
- Reforestation around the factory and residential areas
- Applying POME to the surrounding LA area.
- Testing the source of emission (chimney and boilers) periodically through air pollution reduction.

7.10.3

The unit of certification has identified source of waste pollution and emissions from Estate and Mill activities for the period 2021, through the procedure document No PRO-MIL-013, revised 02 September 1, 2021, Handling Immovable Source Disturbances. Sighted the result of identification of emissions and pollution as well as its sources, such as in estate emissions sources are from fossil fuel usage for transportation and generator, emission from fertilizer usage, pesticide usage and electricity usage. Identified the sources of emission and pollution from mill such as fossil fuel usage, electricity usage and WWTP. In addition, the company also conducts tests related to odour and vibration tests in work and residential areas.

Fossil fuel reducing have been implemented on GMP POM by fiber and shell usage. Realization of renewable energy have been monitored on monthly report for fiber and shell usage, and also for using methane capture as electrical generator. Monitoring for emission and pollutants (air emission and air ambient) from Estate and Mill was done periodically and comply with the standards quality, it's covered on RKL/RPL implementation report and reported to Environmental Agency of Pasaman Barat Regency. Therefore, it can conclude that the plans to reduce or minimize the pollutants are implemented and monitored well by management.

Status: Comply

7.11

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

7.11.1

The company has SOP for land clearing with PT GMP Document No. PRO-EST-002 Revision 01 dated 15 October 2012 and PT PHP with SOP Document No. PRO-EST-002 dated 1 October 2011 concerning land clearing without burning which explains that:

- Land clearing must be in accordance with the existing HGU and in land clearing no burning or zero burning
- Do not clear land in HCV areas, watersheds or land with a slope of > 40%
- Maintaining the balance of the environment around the plantation by providing land that is still forest, all areas that have been cleared are planted with soil cover crops (LCC).

In addition, Wilmar International Ltd, as the parent company of the Wilmar Group Indonesia, also has an environmental policy in 2010 by the Group Plantation Head which explains that the company will implement Zero Burning in all plantation development activities and waste disposal.

Based on management interview land clearing was carried out mechanically by the company. The results of the field visit to PHP-2 replanting area year 2021 there is no indicates of land burning and Land preparation is only done by chipping method.

7.11.2

The unit of certification has established fire prevention and control measures for the lands it manages directly by showing evidence that there are land fire prevention and control activities, which include;

- The existence of document procedure for land fire control, such as;
 - Procedure No. SOP-GEN-012 revision 04, November 4, 2021 concerning emergency response to building and equipment fires.
 - Procedure No. SOP-GEN-014 revision 02, dated 4 November 2021 concerning prevention and management of land fires.
 - Procedure No. SOP-GEN-015 revision 02, November 4, 2021 concerning land and forest fires.
- There is a trained fire team, contained in the Organizational Structure of the Emergency Response Team both at PT GMP and at PHP. The organizational structure of the firefighting team, consist with total 21 member.
- Socialization of land fire prevention to GMP Estate, PHP 1 Estate, and PHP 2 Estate.
- Conducting patrols/monitoring of fire-prone areas (hotspots).
- The company has carried out emergency and fire simulations attended by firefighting team.
- Monitoring of firefighting equipment on a monthly basis.
- Monitoring of powder, foam and CO² fire extinguishers in the plantations and factories regularly every month, with the results of installation and inspection at locations that are ready for use.
- Monitoring of hydrant installations at with actual conditions (firefighting electrical panels, diesel pumps, starting engines, hydrant pillars and boxes, hydrant pipes)
- The company also has a system for detecting early fires using hotspot monitoring technology via deep-processed satellite owned to the Wilmar International Group and will soon be informed to each person in charge via the Telegram.
- Monitoring the list of facilities and infrastructure owned by referring to the standardization of equipment in Ministerial Regulation 5 of 2018, which is listed in the List of Fire Fighting Equipment and Other Equipment with the latest update in December 2022. The company also has a budget plan to continue to completing the needs of team personnel who stated in the 2023 budget. The results of field observations at the Fire Fighting Warehouse at GMP and PHP I and II showed that there were 5 individual sets of equipment consisting of Firefighter Suits, Shoes and Helmets. To fulfill this, the company already has a budget for meeting TPKD equipment in 2023 for each unit. Therefore, certification units are encouraged to ensure the fulfillment of firefighting equipment according to the number of personnel that has been determined. (OFI)

The company can show a recording of the implementation of fire monitoring in the fire patrol monitoring form document in 2022. The results of the inspection of the document revealed that there were no fire incidents in the company's operational areas, several points of fire outside PT GMP's HGU, there are in community plantation which were monitored from monitoring hotspots, caused by the burning of crop residues. However, the company continues to handle forest and land fires that occur outside the company's management area due to SOP which states that fire management is carried out for a radius of 5 Km from the company boundary.

This was reinforced by the results of interviews with the Agriculture Office of Pasaman Barat Regency that there were no fire incidents for two last year. In addition, as an effort to prevent fires, the unit of certification also puts up warnings related to fires, prohibits burning garbage and so on. And it's reported by Land Fire Management Report document for the 2nd semester of 2022 which is submitted to the Agriculture Office of Pasaman Barat Regency on 12 January, 2023.

7.11.3

The unit certification also involves the community in monitoring fire prevention as a preventive and control measure, due to SOP SOP-GEN-014 revision 02, dated 4 November 2021 concerning prevention and management of land fires which states that fire management is carried out for a radius of 5 km from the company boundary.

Fire Prevention and Fighting commitment between company and surrounding village community to prevent, monitor, and manage fire incidents has been socialized for PT GMP is on January 15, 2022 to 31 participants and PT PHP is on January 14, 2022 to 29 participants, are include;

- Cooperate in prevention and control of forest and land fires in areas around the company operational area
- Take care of each other's land from the possibility of fire
- Not clearing land by burning
- Assist each other in carrying out forest and land fire prevention and control activities.

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; 7.12.8

Based on the verification land clearing was first carried out in 1995 to 1999 for the scope of PT GMP and from 1996 to 1999 for the scope of PT PHP. Based on the land clearing data and there is no indication of new land clearing after 15 November 2018, the company has no obligation to conduct a High Carbon Stock (HCS) study.

The Certificate Holder (PT GMP) has performed the HCV identification on 2012 by RSPO Approved HCV Assessor. Management unit has shown confirmation from RSPO related status of the Certificate Holder liability. Explanation from RSPO Secretariat that PT. GMP has submit Disclosure of Liability with status of Zero Liability and has been approved from RSPO with zero liability status.

7.12.2

The unit of certification has identified protected areas and high conservation value areas for the scope of PT GMP and PT PHP. The identification results are listed in the HCV Assessment conducted by AKSENTA using the 2008 HCV toolkit on 25 September – 4 October 2012. The HCV assessment was carried out in a participatory way through participatory mapping and public consultation which was conducted on 4 October 2012 and was attended by 47 people (including representatives of affected parties, for example from the villages of Jorong Sikilang, Jorong Maligi, Jorong Padang Halaban, Jorong Kaar Selatan, Jorong Tanjung Pangka. and *Ninik Mamak* representatives. The HCV identification assessment was carried out for the scope of the PT GMP Unit, for the own estates with an area of 6,000 Ha and PHP 3,800 Ha.

The entire HCV area of PT GMP is divided into two types of management, namely the own Estate conservation area with a total area of 54.63 Ha and the plasma area with a total area of 59.9 Ha. Meanwhile, the area data included in the scope of the audit is only a conservation area located in the Own Estate area, because the plasma area is no longer under company management because currently plasma is independent and manages its own area. The HCV area based on the basic info is 56.04 Ha due to an additional 1.40 Ha HCV area on the Pasaman River Border based on the results of the company's internal HCV management study. Meanwhile, the entire HCV area owned by PT PHP which is 1.92 Ha is only located in PHP-2, while for the PHP-1 area there is no HCV area. Based on this data, the area of the certification unit's HCV management area is **57.96 Ha**.

The HCV area in Plasma is not included in the HCV area in the data area statement because it has been managed independently.

In addition, based on field visits to riparian area in Batang Alin River Block 8B and Batang Pasaman River Block 153, it is known that the border area has planted with oil palm. In addition, the company made efforts to planted riparian areas by gradual restoration program, construction of a 333 meter embankment, rehabilitation program, and erosion prevention plants (i.e vertiver grass). All conservation areas owned by the unit of certification are in accordance with what is stated in the basic info.

7.12.3

Based on the notice on the RSPO website it is known that the High Forest Cover Landscapes and High Forest Cover Countries have

not been established by the RSPO. So that this standard has not yet been assessed.

7.12.4

The unit of certification has carried out activities in order to maintain protected areas and High Conservation Values which implemented in line according with the HCV management and monitoring plan period 2022, also reviewed periodically every years involved consultation with relevant stakeholders such as villagers around.

- RTE species monitoring
- Maintenance of RTE species warning boards
- Socialization to employees and the community around
- Maintenance of HCV boundary markers, attributes, and warning boards with a buffer zone/river border with a width of 50-100 m right and left along the river, as a spray boundary in the form of a cross
- Manual maintenance on planted area near the riparian belt
- HCV rehabilitation monitoring of erosion prevention plants *with vertifier grass* and reforestation with local plant (*Durian, Salam, Mahoni, etc.*)
- Applying environmentally friendly cultivation methods (using slow release fertilizer, utilization of organic waste, application of IPM)

Based on interviews with management representatives it is known that the entire protected area belongs to the planted area. This is due to the identification of protected areas after oil palm planting has been carried out. In addition, based on field visits to riparian area, such as Batang Pasaman River Block E153, and Batang Alin River Block 8B it is known that the border area has planted with oil palm and the location of the protected area matches the map with the actual location in the field. In addition, the company made efforts to rehabilitation the river border areas by erosion prevention plants and embankment construction.

7.12.5

As a result of field visits to the HCV areas managed by the company, there were no HCV 5 and 6 areas where rights to culture and an important place for the surrounding community were not identified in the company area. The environmental conditions of the company both within the scope and in the community area are almost entirely oil palm planted areas.

While the existence of the community existed before the existence of plantations, the unit of certification also continuously provides guidance to the community to protecting the riparian areas with prohibition of use of chemicals to the river, poaching, and encroachment.

7.12.6

Unit of Certification has a SOP for protection of endangered species No. SOP-EHS-030 revision 01, dated November 4, 2021. The SOP aims to ensure that all procedures consisting of preventive and repressive measures in the effort to protect protected wild animals and plants such as sustainability principle, all employees are advised not to hunt, capture, kill and sell endangered protected animals and plants and report any such activities. Maintain and not disturb the area designated as HCV area and report any illegal acts. Employees who do not comply will be subject to sanctions in accordance with applicable laws and regulations. The company also installs no hunting signboards with photos of species and sanctions for violating government regulations in all HCV areas.

Based on the 2012 PT GMP and PT PHP Protected Area Identification Report document by an external consultant, namely AKSENTA, 63 species of herpetofaunas, 107 species of birds, and 37 species of mammals. Of the total 207 fauna species, there are several protected species in the company area, including (*Crocodylus porosus*) Saltwater crocodile, (*Elanus caeruleus*) Rat eagle, (*Haliastur indus*) Bondol eagle, (*Ichthyophaga humilis*) Small fish eagle, (*Nisaetus cirrhatu*) Dark-phase brontok eagle, (*Rhipidura javanica*) Striped Kipasan, (*Spilornis cheela*) Bido snake-eagle, (*Prionailurus bengalensis*) Kuwuk cat/ Jungle cat, and (*Trachypithecus cristatus*) Cingkuak/lutuang, (*Alcedo euryzana*) Blue-necked king prawn, (*Anthracoseros albirosis*) White-bellied kakareng, (*Haliastur indus*) Bondol eagle, (*Ichthyophaga humilis*) Small fish eagle, (*Prionailurus bengalensis*) Kuwuk cat, and (*Tomistoma scheregelli*) Sinyulong which uses protection based on Government Regulation Number 7 of 1999.

From monitoring report held on 2022, the results of the identification of flora and fauna using the latest protection regulations, namely Permen LHK Number 106 of 2018 which are within the within the unit of certification area, including:

- **Flora:** Consisting of 26 species of plants, with 3 types of them, such as: *Eugenia bankensis*, *Durio kutaiensis*, and *Malaleuca sp.*
- **Fauna:** Consisting of 24 species of birds, 8 species of mammals, and 5 species of reptiles with 8 pisces, several of which are

protected, such as; *Halycon smyrnensis*, *Pelargopsis capensis*, *Spilornis cheela*, *Heliatus leucogaster*, *Lepottilos javanicus*, *Cairina scutulata*, *Tarsius spp*, *Lutra sumatrana*, and *Prionailurus bangaleris*.

The certification unit has a flora and fauna identification document prior and monitoring program that is scheduled annually to update species data found in the company area using the latest protection regulations, namely Permen LHK Number 106 of 2018. This report is submitted to the institution that handles conservation and protection of plants and wild animals on a regular basis in Report on the Implementation of Management and Monitoring of High Conservation Value Areas which including the results of species monitoring and observations on 09 June 2022.

Based on the results of interviews with representatives of the surrounded community in GMP and PHP I & 2 emplacement also Aih Gadang Village, it is known that the community understands the existence of the HCV area and the presence of flora and fauna in the company area. The village community understands that the company protects the HCV area also for flora & fauna, and is aware of the protected fauna species, prohibitions on hunting, logging and burning forests. Unit of certification also installed warning boards or signboards marking HCV areas as well as prohibitions on environmental destruction which were an indirect form of socialization. Based on this explanation, it can be concluded that the company already has a plan and evidence of the implementation of socialization and is known by the surrounding community.

7.12.7

Unit of certification can show records of HCV management carried out in the period 2022 periodically done every week to ensure the security of the area. The monitoring activities were carried out at several locations there are on block 53, 62, 65, 75, 76. The results of the monitoring are used for follow-up improvements to the management plan, the item to be monitored are include:

- Land burning
- Illegal logging
- Sacred places
- Hunting activity
- POME pollution to HCV area
- Effluent spill from Land Application
- Domestic waste pollution in the HCV area
- Spraying activity on riparian areas
- Marking of oil palm stakes/trees on riparian areas
- Palm oil insertion on riparian areas
- Fertilizer application on riparian areas
- Land clearing
- Illegal Mining
- Inventory of RTE animals

The results of field visits to several conservation areas show that the company has carried out management of protected areas such as replanting local species, not logging, not using chemicals, and installing Protected Area signs and prohibiting hunting. Avoid and prevent illegal hunting and/or encroachment of HCV areas that have been determined by PT. GMP and PT PHP, several warning boards have been installed regarding the prohibition of poaching and encroachment. Routine monitoring of HCV areas is carried out by several personnel appointed by the company. The results of field observations also indicate that there are signs that prohibit hunting of protected animals, burning, and marking the boundaries of conservation areas.

HCV monitoring is periodically evaluated by unit of certification every year and is used as a reference as a management plan for HCV management. The management plan is implemented effectively based on the results of monitoring from the previous period. All evaluation results will be reviewed and will be adjusted to the HCV management program in the 2023 period.

The certification unit has a continuous action to improve the management plan resulting from the previous period report as an effort to improve the quality of HCV management and monitoring activities in accordance with the recommendations. HCV monitoring is periodically evaluated by unit of certification every year and is used as a reference as a management plan for HCV management. All evaluation results will be reviewed and will be adjusted to the HCV management program in the 2023 period, including by:

- Maintain existing populations of identified species

<ul style="list-style-type: none"> - No wildlife hunting - No encroachment • Implementation of open area rehabilitation • Maintaining swamp forest and riparian habitats • Maintaining freshwater swamp forest ecosystems • Maintaining the extent of the ecosystem (HCV 3) • Avoiding damage to water quality, especially downstream <ul style="list-style-type: none"> - Compliance with quality standards PP 82 of 2001 • Avoid erosion 		
	<p>Status: Comply</p>	

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 1.4	GMP POM and its supply bases did not use trademark in the product or any of its activity	✓
	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 1.4	GMP POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or √
ASA 1.4	GMP POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or √
ASA 1.4	GMP POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

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

Wilmar International Ltd Time Bound Plan (TBP) is explained in point 1.10. Wilmar International Ltd has informed the TBP progress, MUTU has considered that Wilmar International Ltd is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Wilmar International Ltd for Indonesia, Malaysia and Africa update in October 2022

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

MUTU Auditor has verified company partial certification and concludes that:

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Wilmar Engaged Control Union to conducted assessment of compliance on the minimum requirements for multiple management units as detailed in section 5.5 of the RSPO Certification System for Principles & Criteria June 2020 for Wilmar International Limited and its subsidiaries as listed in this report below
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)	<p>There is no replacement of primary forest since November 2005. HCV assessments are conducted prior to new planting and all new plantings are in accordance with RSPO New Planting Procedures. Below is the summary of proposed new oil planting for the group:</p> <p>Biase Plantations limited RSPO NPP public comment was completed on the 11th of October 2012, with zero public comments.</p> <p>Biase Plantations Limited (Calaro extension) RSPO NPP public comment was completed on the 16th of September 2016, with zero public comments.</p> <p>Eyop Industries is made up of three sites or estates – Ibad Estate, Kwafalls Estate and Oban Estate. Ibad Estate is undergoing replanting and hence not an issue as it stands. Kwafalls underwent replanting and fully planted since 2017. Oban Estate is greenfield and no operations have started, pending when all assessments will be done and completed. Due to the conflicting status of Oban Estate and parts of Ibad, management have excluded Oban and the disputed</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>parts of Ibad Estate from any development until the status of the two areas are resolved with the CRNP and the State government.</p> <p>The internal audit documentation for uncertified areas were observed and it is confirmed that there was no replacement of primary forest.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>There is no replacement of primary forest since November 2005. HCV assessments are conducted prior to new planting and all new plantings are in accordance with RSPO New Planting Procedures. Below is the summary of proposed new oil planting for the group:</p> <p>Biase Plantations limited RSPO NPP public comment was completed on the 11th of October 2012, with zero public comments.</p> <p>Biase Plantations Limited (Calaro extension) RSPO NPP public comment was completed on the 16th of September 2016, with zero public comments.</p> <p>Eyop Industries is made up of three sites or estates – Ibad Estate, Kwafalls Estate and Oban Estate. Ibad Estate is undergoing replanting and hence not an issue as it stands. Kwafalls underwent replanting and fully planted since 2017. Oban Estate is greenfield and no operations have started, pending when all assessments will be done and completed. Due to the conflicting status of Oban Estate and parts of Ibad, management have excluded Oban and the disputed parts of Ibad Estate from any development until the status of the two areas are resolved with the CRNP and the State government.</p> <p>The internal audit documentation for uncertified areas were observed and it is confirmed that there was no replacement of primary forest.</p>
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p>There is currently only one active RSPO complaints made on PT Bumi Pratama Khatulistiwa, subsidiary of Wilmar International Limited, registered as an RSPO complaint case on the 4th of March 2022. Complaint is on land issue, and the status of the complaint is still ongoing and under investigation.</p> <p>The group has policy for any complaint. Where employees of the Wilmar Group in confidence, raise concerns about possible corporate improprieties. This Policy ensures that</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>arrangements are in place for independent investigations of alleged improprieties and for appropriate follow-up actions as link below:</p> <p>https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/wilmar-whistleblowing-policy.pdf</p> <p>This grievance procedure is open to all stakeholders, though is primarily focused on receiving grievances from external sources. For workers and local communities with specific local level grievances, each of our plantation and mill operational units have site specific complaints and grievances procedures, which have been a requirement of the RSPO Principles and Criteria since 2005. These site-specific procedures are accessible by workers and to any other stakeholder. Grievances raised through the site-specific procedures have a separate resolution process - Consultation and Communication Procedure. The SOP also available in website link as below:</p> <p>https://www.wilmar-international.com/docs/defaultsource/default-document-library/sustainability/grievance/grievance-sop/grievance-procedure_final.pdf?sfvrsn=7670cea2_2</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p>The group has Dispute & Resolution Procedure Doc No PPB/RSPO 6.3 (2.2)/(1) revision date 25 Oct 2018 purpose to facilitate a dispute and grievances resolution process between the management, growers and miller and employees, local communities and other affected external parties.</p> <p>The internal audit documentation for uncertified areas were observed and it is confirmed that there were no land conflicts.</p>
2.1.6	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1 (it has changed be Criterion 4.2 in P&C 2018).	<p>The internal audit procedure doc no PBB/PRO12/(03)/0212 revision 23 March 2020 (Rev 4) conducted periodically for uncertified and certified area and result of internal audit for uncertified areas were observed and it is confirmed that all laws are in compliance after the noncompliance identified in the internal audit have been addressed.</p>

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

3.4.1. Identification of Findings, Corrective Actions and Observations at ASA 1.3 Assessment

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

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA 1.4 Assessment

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

3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	3.4.2	<p>As a follow-up effort to the 2022 SIA Social Impact Review and Update, the company has developed a social management and monitoring plan which is developed as outlined in the Social Management and Monitoring Plan document. Involvement in the document preparation process is known to have involved external and internal stakeholders. Furthermore, the results of document reviews and interviews with management and stakeholders (internal and external) found that the company had managed issues that could have a social impact which were carried out partially by the relevant departments but were not explained in detail in the SIA review report, for example;</p> <ul style="list-style-type: none"> • Attention to social dynamics in the environment of indigenous peoples / customary owners who can have a direct or indirect impact on the company's operational activities • Attention related to the dynamics in the aspect of employment such as the existence of workers' organizations and industrial relations • Issues related to dissatisfaction with tali asih or social assistance <p>Based on the explanation above, companies are encouraged to develop a comprehensive social monitoring and management plan by integrating between sections/departments that cover all impacts and represent a sample of affected parties.</p>
2	3.6.1	<p>The results of the field visit in the POM area found that there is a reservoir/reservoir as a water reservoir for POM operations. In the vicinity of this area, there have been several warnings of potential hazards and prohibitions that must be obeyed. In addition, the measurement results show that the distance between the reservoir and the nearest housing is about 150 meters and it is surrounded by oil palm plantations where unauthorized parties should not be around the area.</p> <p>During a field visit, the auditor found several children playing around the area, ignoring the potential hazards that might occur. Based on this, the auditor team encouraged the company to review the mitigation of potential hazard risks around the reservoir.</p>
3	4.6.4	<p>Even though the company has obtained land title, there were complaints/issues regarding land issues in PHP 1 Estate. this issue between PT PHP and the Kanagarian Kapa, the issue regarding this issue stems from the demands of the community regarding the construction of a plasma plantation which is said to have not been realized according to the initial agreement (MOU). Regarding that's issue on 13 February 2020 an agreement was reached with the Kenagarian Kapa Indigenous People, Luhak Nan Duo District, Pasaman Barat Regency, Province Sumatra Barat, This document was signed by the parties, including: Representatives of PT PHP 1, Representatives of Kenagarian Kapa, Representatives of the RSPO Indonesia, Pasaman Barat Regency Government Representative and IMN Facilitator Team, signed on a stamp duty of Rp. 6,000. The main points of the document include: that PT PHP paid compassion monthly to Gampo Alam Pucuk Adat and Ninik Mamak Nagari Kapa until the HGU expires. As a follow-up to the agreement, PT PHP has periodically paid monthly compensation for 6 months until July 2022.</p> <p>In August 2020 there were objections from other parties in the Kapa Indigenous People and reoccupied the agreed area, and to date (January 2023) the occupied area is 463 Ha. Because of this, as informed by the management and traditional leaders, the tali asih fund should have been postponed. The results of a document review, interviews with the management and traditional kanagarian leaders when the demands of the people who occupy the area have been declared unacceptable by the court.</p> <p>The results of interviews with traditional leaders of Kanagarian Kapa explained that by not accepting claims from some communities, they had communicated with the company regarding the compassion, which had temporarily been postponed.</p> <p>In this regard, companies are encouraged to respond or respond to requests from indigenous peoples regarding</p>

		compassions
3	4.8.2	In August 2020 there were objections from other parties in the Kapa Indigenous People and reoccupied the agreed area, and to date (January 2023) the occupied area is 463 Ha. Because of this, as informed by the management and traditional leaders, the tali asih fund should have been postponed. The results of a document review, interviews with the management and traditional kanagarian leaders when the demands of the people who occupy the area have been declared unacceptable by the court and in the process of cassation in the Supreme Court. In this regard, companies are encouraged to continue to handle all unresolved conflicts through appropriate conflict resolution mechanisms
4	6.7.2	Based on the results of field observations in the Estate and Mill areas, it is known that the company has installed OHS symbols, has fire extinguishers, installed MSDS, and has hydrants in strategic locations according to the level of danger. During the audit process the auditor team assesses that the company is encouraged to improve performance such as: <ul style="list-style-type: none"> • More informative OHS signs/symbols not limited to symbols only • MSDS is placed in a place that is easy to read (not too high) • SOP / Policy in a more informative form that attracts employees' attention • - Fire extinguishers are placed in a place that is more easily accessible
5	7.3.2	The company already has Waste Management SOP No. PRO-EHS-004 which explains that hazardous waste must be collected separately from non-hazazardous waste. Then it is transported and collected to the hazardous temporary storage to be handed over to a collection company that already has a permit. This procedure has been disseminated to employees on a regular basis During the audit process the auditor team conducted interviews with several workers whose work locations produced hazardous waste, but there were some workers who had not been able to explain in detail regarding the management of the waste produced. In this regard, the company needs to ensure the evaluation and effectiveness of socializing waste management to employees, especially for employees working in work areas that produce hazardous waste.
6	7.11.2	The certification unit has an Emergency Response Team as an effort to prevent and control land fires referring to Minister of Agriculture 05 of 2018, each consisting of 7 personnel. The results of field observations at the Fire Fighting Warehouse at GMP and PHP I and II showed that there were 5 individual sets of equipment consisting of Firefighter Suits, Shoes and Helmets. To fulfill this, the company already has a budget for meeting emergency team response equipment in 2023 for each unit. Therefore, certification units are encouraged to ensure the fulfillment of firefighting equipment in accordance with the number of personnel that has been determined.

3.4.4. Noteworthy Positive Components

No	Description
1	The company's commitment to implementing a sustainable palm oil management system.
2	Have Methane Capture as a renewable energy producer and minimize GHG emissions
3	Good document's presentation and cooperation during the audit process
4	Provide educational facilities that are quite good

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Plantation Agency of West Pasaman Regency</p> <ul style="list-style-type: none"> • Replanting – there is 2021, plans for 2025 • <i>LPUP</i> is routinely reported • <i>PUP</i> – still valid (2021-2024 period) reported no land disputes • Fire facilities and infrastructure • Direct supervision, for guidance and evaluation is carried out at the provincial level, while for supervision it is carried out by the regions • For replanting seedlings, GMP has submitted <i>SP2PKS</i>, plans for 130 ha • The FFB price is determined every week, the last FFB price is Rp. 2,681,-/ kg • Regarding requests for information, Department of Plantation already knows the flow (can go through the company's office) so far there has been no request for information sent. 	<p>There are no issues that need further verification.</p>
<p>Manpower Office of West Pasaman Regency</p> <ul style="list-style-type: none"> • The latest 2023 <i>UMP</i> has been socialized, so far there have been no complaints regarding wages. • Routine reports have been submitted by companies such as <i>P2K3</i> (last quarter IV 2022). • No work accidents were reported. • <i>WLTK</i> reporting is already online, although the application still sends manually. • Direct supervision from the last Manpower Office in early 2022. • For those related to <i>SIO</i>, <i>PPE</i>, <i>P2K3</i> etc. it is carried out by the provincial Manpower Office as supervisory duties, districts are only related to Industrial Relations. • <i>BPJS</i> Labor and Health have all been paid. 	<p>There are no issues that need further verification.</p>
<p>Environmental Agency of West Pasaman Regency</p> <ul style="list-style-type: none"> • GMP permits do not change, renew automatically according to OSS • <i>PHP</i> – there is an addendum plan, related to replanting activities but is constrained by the spatial planning agency • Routine reporting is reported such as; waste reporting, <i>POME</i> Management, <i>RKL RPL</i> Report • In the last 2 (two) years there have been no reports of pollution issues either from the public or findings from the Department • Direct supervision from the agency been carried out in August 2022 • Activities carried out with the agency include dissemination of the latest regulations. 	<p>There are no issues that need further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><i>ATR/BPN</i></p> <ul style="list-style-type: none"> Utilization of <i>HGU</i>– reported annually There has been no change or opening of new land by the company Related Letter from the <i>Kelompok Tani Air Mago</i>, in Jorong Rantau Panjang, Ranah Pesisir District, West Pasaman Regency. Regarding the ulayat land requested to be returned through a meeting of the nagari institution. 	<p>There are no issues that need further verification.</p>
<ul style="list-style-type: none"> Community Leader (<i>Ninik Mamak and Datuk</i>) of Nagari Kapa Community Leader (<i>Ninik Mamak, Datuk and Kerapatan Adat Nagari/KAM</i>) of Nagari Kapa Community Leader (<i>Ninik Mamak, Datuk and Kerapatan Adat Nagari/KAM</i>) of Nagari Sasak <p>The team auditor conducted an interview regarding the process of acquiring land, consention area, the structure of indigenous peoples, land disputes, social relations, social issues, transparency, environment and employment and relevant aspect about RSPO</p>	<p>There is issue regarding social aspect and its has been verify by auditor in criteria 4.2; 4.4; 4.6 and 4.8</p>
<p>Worker Union <i>SERBUNDO</i> PT. PHP</p> <ul style="list-style-type: none"> Internal union meetings were held whenever it's needed, and at least twice a month. The wages paid by the company were in accordance with the applicable minimum wage.. 	<p>There are no issues that need further verification.</p>
<p>Gender Committee PT Gersindo Minang Plantation.</p> <p>Since 2012, the gender committee is still actively organizing in the company. The management of the gender committee has been officially approved by the management and consists of administrators who are male and female workers. Since 2022 there have been no issues related to gender, harassment, violence or serious violations of reproductive rights in the company environment area. At present it is certain that no workers who work with chemicals are pregnant or breastfeeding women, this is because the company has a separate policy regarding the prohibition for pregnant or breastfeeding women workers to work in jobs related to chemicals.</p>	<p>There are no issues related to gender, harassment, violence or serious violations of reproductive rights in the company's operational area.</p>
<p>Worker Cooperative Maju Jaya Bersama PT Gersindo Minang Plantation.</p> <ul style="list-style-type: none"> The Workers Cooperative, which is owned by the company, has been formed since 1998 and was originally engaged in the savings-loan sector and <i>Warung Serba Ada</i> (Waserda). However, over time, in the last six years the management of the 	<p>There are no issues that require further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>cooperative has not run a business in the <i>Warung Serba Ada</i> (Waserda) sector and has only continued its business in the savings-loan sector. The cooperative's Annual Member Meeting (RAT) has also been held regularly and the last activity was held in June 2022 for financial accountability in 2021. Having this cooperative has been very helpful to workers.</p>	
<p>Ninik Mamak Tanjung Pangkal (Datuk Sultan Majolelo), Kenagarian Lingkung Aur.</p> <p>Communication relations over the past year have been quite good and there have been no problems that could not be resolved with the intensive discussion. The company always includes Ninik Mamak in social studies activities and the formulation of CSR plans every year. For the implementation of the CSR program, it is felt to have been very good and, in the future, so that it can be maintained. There were no issues or incidents between Ninik Mamak and Nagari related to land disputes/claims, sexual harassment, discrimination, violence or other negative things during the past year.</p>	<p>There is nothing that requires further verification.</p>
<p>Lingkung Aur 2 Village Unit Cooperative (Koperasi Unit Desa/KUD).</p> <p>Communication relations have been established quite well over the past year. Disclosure of information related to the selling price of FFB has been carried out quite well by the company and also the cooperative is one of the members/parties included in the pricing team in West Sumatra Province. Payment for FFB purchases is in accordance with the existing pricing and there has never been a delay. Assistance related to cultivation practices and providing management assistance if there are things needed such as PSR (People's Palm Replanting) management can be assisted by the company.</p>	<p>There is nothing that requires further verification.</p>
<p>Permata Sawit Maligi Cooperative.</p> <p>Communication relations have been established quite well over the past year. Disclosure of information related to the selling price of FFB has been carried out quite well by the company and also the cooperative is one of the members/parties included in the pricing team in West Sumatra Province. Payment for FFB purchases is in accordance with the existing pricing and there has never been a delay. Assistance related to cultivation practices and providing management assistance if there are things needed such as PSR (People's Palm Replanting) management can be assisted by the company.</p>	<p>There is nothing that requires further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Mutiara Bosa Sikilang Multi-Business Cooperative (Koperasi Serba Usaha/KSU).</p> <p>Communication relations have been established quite well over the past year. Disclosure of information related to the selling price of FFB has been carried out quite well by the company and also the cooperative is one of the members/parties included in the pricing team in West Sumatra Province. Payment for FFB purchases is in accordance with the existing pricing and there has never been a delay. Assistance related to cultivation practices and providing management assistance if there are things needed such as PSR (People's Palm Replanting) management can be assisted by the company.</p>	<p>There is nothing that requires further verification.</p>
<p>Kenagarian Maligi.</p> <p>Communication relations over the past year have been quite good and there have been no problems that could not be resolved with the intensive discussion. The company always includes Ninik Mamak in social studies activities and the formulation of CSR plans every year. For the implementation of the CSR program, it is felt to have been very good and, in the future, so that it can be maintained. There were no issues or incidents between Ninik Mamak and Nagari related to land disputes/claims, sexual harassment, discrimination, violence or other negative things during the past year.</p>	<p>There is nothing that requires further verification.</p>
<p>Bina Tani Sejahtera Cooperative.</p> <p>Communication relations have been established quite well over the past year. Disclosure of information related to the selling price of FFB has been carried out quite well by the company and also the cooperative is one of the members/parties included in the pricing team in West Sumatra Province. Payment for FFB purchases is in accordance with the existing pricing and there has never been a delay. Assistance related to cultivation practices and providing management assistance if there are things needed.</p> <p>Over the past year there have been a few problems related to the area of land belonging to cooperative farmer members whose land has been occupied by other parties after land clearing activities. This has been discussed jointly with the company and also those who occupy the land. The result is that several agreements have been reached and their completion is still in progress.</p>	<p>There is nothing that requires further verification related to relation and selling FFB.</p> <p>Related to the existence of the area of land belonging to cooperative farmer members whose land has been occupied by other parties after land clearing activities will be explained in more detail in criterion 4.8</p>
<p>Kenagarian Lingkung Aur Hili.</p> <p>Communication relations over the past year have been quite good and there have been no problems that could not be resolved with the intensive discussion. The company always includes Ninik Mamak in social studies activities and the formulation of CSR plans</p>	<p>There is nothing that requires further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>every year. For the implementation of the CSR program, it is felt to have been very good and, in the future, so that it can be maintained. There were no issues or incidents between Ninik Mamak and Nagari related to land disputes/claims, sexual harassment, discrimination, violence or other negative things during the past year.</p>	
<p>SARBUKSI – Serikat Buruh Industri Perkebunan Sawit Indonesia (Worker Union).</p> <p>Currently, the communication relationship between the company and the union has been well established, although previously there were demonstrations related to workers' wages. The demonstration occurred because the union felt that the harvest wages given so far were still below standard and the base given was quite high. However, after the demonstration activity in April 2022 which was carried out by workers and unions, the company has provided an explanation regarding this matter and has made several improvements such as:</p> <ul style="list-style-type: none"> ● Raised the abnormal fruit reward from the previous one. ● Explains the increase in base which turned out to be increasing due to the age of the plant and its increased productivity. ● Raise the price of loose fruits. <p>From the improvements mentioned above, union and members have agreed not to carry out demonstration activities again and agree to this. This improvement has been felt by the union and other workers until the audit activity took place. This issue also available on internet / online media</p> <p>Apart from those related to issues clarified by the union, there are still new demands from the union at this time, namely related to the absence of provisions related to leave and the obligation to provide office facilities for the union in Collective Labor Agreement.</p>	<p>Regarding the issue of demonstrations that occurred in 2022, the unions clarified it and declared it had been completed.</p> <p>Issues related to the absence/non-stipulation of leave in the Collective Labor Agreement are incorrect because this has been regulated quite clearly, such as annual leave given for 12 days to workers who work more than a year, provisions for granting maternity leave, menstrual leave and paid leave. - Other leave has been fully arranged.</p> <p>As for issues related to the obligation to provide an office which is stated to have been regulated in the Collective Labor Agreement, this is incorrect because the document does not regulate this matter and there is no regulatory basis that states that companies are required to provide facilities in the form of an office for labor union activities.</p>
<p>CV Dian RP (Local Contractor).</p> <p>So far, the cooperation activities and communication relations between the contractor and the company have been going quite well. The company has routinely provided socialization related to its policies and several matters related to the complaint mechanism. The contractor also, while working with the company, has an obligation to comply with relevant regulations, starting from minimum wages, OHS to legal obligations. All of these have been fulfilled in stages by the contractor.</p>	<p>There is nothing that requires further verification.</p>
<p>SPSI – Serikat Pekerja Seluruh Indonesia (Worker Union).</p> <p>Currently the union has been actively organizing in the company since the last few years. Therefore, the communication relationship between the union and the company has been quite good for the</p>	<p>There is nothing that requires further verification.</p>



Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>last few years. It is acknowledged that the employment system implemented by the company for 2022 refers to the PKB that is owned and is based on existing laws and regulations in Indonesia. These implementations include the application of minimum wages, overtime, holiday allowance, PPE, bonuses and others.</p> <p>The company also gives freedom to workers to organize (without coercion or prohibition) and there is no intervention in terms of organizing or selecting union officials. The grievance/complaint mechanism is also well known to workers, where workers can submit it through their direct superiors, trade unions or through the whistleblowing mechanism provided by the company. If there are complaints / complaints from the company so far, they quickly respond.</p> <p>There have been no accident fatalities (deaths) over the past year (2022) and routine health checks have been carried out (periodic and special health checks). Apart from that, there have never been any incidents/issues related to child labor, sexual harassment, violence or acts of discrimination by the company.</p>	
<p>Kenagarian Kapa.</p> <p>Communication relations over the past year have been quite good and there have been no problems that could not be resolved with the intensive discussion. The company always includes Ninik Mamak in social studies activities and the formulation of CSR plans every year. For the implementation of the CSR program, it is felt to have been very good and, in the future, so that it can be maintained.</p> <p>According to Kenagarian Kapa, related to the issue of land claims made by the company to customary land in Kenagarian Kapa is not true. This is because, when the company initially obtained permission to carry out operational activities in the blood, the Ninik Mamak had previously agreed to it and legally handed over the customary land rights to the company. However, for now the parties who admit that the land is their customary land are the parties who previously agreed to it but deny this and still think that the company has exercised control over their customary land.</p>	<p>Related to further explanation of the issue of customary land rights will be explained in criterion 4.8</p>
<p>Kapa Village Unit Cooperative (Koperasi Unit Desa/KUD).</p> <p>Communication relations have been established quite well over the past year. Disclosure of information related to the selling price of FFB has been carried out quite well by the company and also the cooperative is one of the members/parties included in the pricing team in West Sumatra Province. Payment for FFB purchases is in accordance with the existing pricing and there has never been a delay. Assistance related to cultivation practices and providing management assistance if there are things needed such as PSR (People's Palm Replanting) management can be assisted by the company.</p>	<p>There is nothing that requires further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Rantau Pasaman Village Unit Cooperative (Koperasi Unit Desa/KUD).</p> <p>Communication relations have been established quite well over the past year. Disclosure of information related to the selling price of FFB has been carried out quite well by the company and also the cooperative is one of the members/parties included in the pricing team in West Sumatra Province. Payment for FFB purchases is in accordance with the existing pricing and there has never been a delay. Assistance related to cultivation practices and providing management assistance if there are things needed such as PSR (People's Palm Replanting) management can be assisted by the company.</p>	<p>There is nothing that requires further verification.</p>
<p>Kenagarian Sikilang.</p> <p>Communication relations over the past year have been quite good and there have been no problems that could not be resolved with the intensive discussion. The company always includes Ninik Mamak in social studies activities and the formulation of CSR plans every year. For the implementation of the CSR program, it is felt to have been very good and, in the future, so that it can be maintained. There were no issues or incidents between Ninik Mamak and Nagari related to land disputes/claims, sexual harassment, discrimination, violence or other negative things during the past year.</p>	<p>There is nothing that requires further verification.</p>
<p>Ninik Mamak Maligi (Datuk Majalelo Maligi), Kenagarian Maligi.</p> <p>Communication relations over the past year have been quite good and there have been no problems that could not be resolved with the intensive discussion. The company always includes Ninik Mamak in social studies activities and the formulation of CSR plans every year. For the implementation of the CSR program, it is felt to have been very good and, in the future, so that it can be maintained. There were no issues or incidents between Ninik Mamak and Nagari related to land disputes/claims, sexual harassment, discrimination, violence or other negative things during the past year.</p>	<p>There is nothing that requires further verification.</p>
<p>Kenagarian Sasa.</p> <p>Communication relations over the past year have been quite good and there have been no problems that could not be resolved with the intensive discussion. The company always includes Ninik Mamak in social studies activities and the formulation of CSR plans every year. For the implementation of the CSR program, it is felt to</p>	<p>There is nothing that requires further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>have been very good and, in the future, so that it can be maintained. There were no issues or incidents between Ninik Mamak and Nagari related to land disputes/claims, sexual harassment, discrimination, violence or other negative things during the past year.</p>	
<p>Ninik Mamak Sikilang (Datuk Bosa Sikilang), Kenagarian Sikilang.</p> <p>Communication relations over the past year have been quite good and there have been no problems that could not be resolved with the intensive discussion. The company always includes Ninik Mamak in social studies activities and the formulation of CSR plans every year. For the implementation of the CSR program, it is felt to have been very good and, in the future, so that it can be maintained. There were no issues or incidents between Ninik Mamak and Nagari related to land disputes/claims, sexual harassment, discrimination, violence or other negative things during the past year.</p>	<p>There is nothing that requires further verification.</p>
<p>Gender Committee PT Gersindo Minang Plantation.</p> <p>Since 2012, the gender committee is still actively organizing in the company. The management of the gender committee has been officially approved by the management and consists of administrators who are male and female workers. Since 2022 there have been no issues related to gender, harassment, violence or serious violations of reproductive rights in the company environment area. At present it is certain that no workers who work with chemicals are pregnant or breastfeeding women, this is because the company has a separate policy regarding the prohibition for pregnant or breastfeeding women workers to work in jobs related to chemicals.</p>	<p>There are no issues related to gender, harassment, violence or serious violations of reproductive rights in the company's operational area.</p>
<p>Worker Cooperative Maju Jaya Bersama PT Gersindo Minang Plantation.</p> <p>The Workers Cooperative, which is owned by the company, has been formed since 1998 and was originally engaged in the savings-loan sector and <i>Warung Serba Ada</i> (Waserda). However, over time, in the last six years the management of the cooperative has not run a business in the <i>Warung Serba Ada</i> (Waserda) sector and has only continued its business in the savings-loan sector. The cooperative's Annual Member Meeting (RAT) has also been held regularly and the last activity was held in June 2022 for financial accountability in 2021. Having this cooperative has been very helpful to workers.</p>	<p>There are no issues that require further verification.</p>
<p>Issues related to Illegal/Non Permissible Clinic for PT Gersindo Minang Plantation on Websites/Online Media.</p> <p>First media online : voi.id Second media online : sumbar.ipnn.com</p>	<p>Based on the results of interviews and document review with</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Third media online : sumbar.antarnews.com Topic : Clinic Permit in PT GMP</p>	<p>the company's management, it is known that currently the company does not have a clinic and is only a First Aid Post affiliated with the PT AMP Plantation Clinic (Wilmar Group). The company also said that the processing of the clinic license had been carried out since 2022 and until now it has completed obtaining technical recommendations for issuing permits from the Health Agency of Pasaman Barat Regency, but the complete document input and approval have not been carried out online and from the Investment and One Stop Service of Pasaman Barat Regency. The following are supporting documents that can be shown by the company during the audit:</p> <ul style="list-style-type: none"> ● Risk-Based Business Licensing Documents with Standard Certificate No. 27062200414840003 dated 22 August 2022 issued by the Regent of Pasaman Barat (this permit is a permit in the form of OSS). ● Application letter from the Gersindo Minang Plantation Clinic dated September 14, 2022 to the Investment and One Stop Service Agency of Pasaman Barat Regency regarding Application for Submission of a Clinic License. The letter also attaches the documents required for permit application and this has been received by the service on the same date. ● In accordance with the application letter above, on December 7, 2022 the Health Office and the Investment and One Stop Service Agency of Pasaman Barat Regency carried out a Field Verification activity to provide Technical Approval for the Gersindo Minang Plantation Clinic Permit. The result of the verification is that there are still a number of deficiencies which are still being recorded by the verifier team, namely as many as 5 records. ● On December 21, 2022 the company has made improvements to all records found during the verification activity. The company also made Letter No. 01/GMP Clinic/Ext-XII/2022 dated December 21, 2022 concerning Commitment to Fulfill the Requirements for Gersindo Minang Plantation Clinical Medical Devices. The Commitment Letter was also given to the Health Agency of Pasaman Barat Regency on the same date. ● On January 9, 2023 the company has sent evidence and supporting documents (other documents) for clinical licensing requirements to the Health Agency of Pasaman Barat Regency. ● On January 11, 2023, the Health Agency of Pasaman Barat Regency issued Recommendation for Clinic Operational Permit No. 440/107/Dinkes/XI/2022 for the Gersindo Minang Plantation Clinic as an Outpatient Primary Clinic. ● Based on the Clinical Operational Permit Recommendation Letter for the Gersindo Minang Plantation Clinic as an Outpatient Primary Clinic, it has been included in the OSS system for Risk-Based Business Licensing with KBLI Code 86105 for Private Clinic Activities and the statement is "Not

Public Issues (Institution/ NGO/Community)	Auditor Verification
	<p>Verified".</p> <p>Based on the explanation above, currently the licensing process is proceeding as it should and has reached the stage of obtaining a Clinical Operational Permit Recommendation. However, inputting this and approval into the OSS system carried out by the Investment and One-Stop Services Agency of Pasaman Agency of Pasaman Barat Regency has not been completed.</p> <p>This will be confirmed again during the next audit activity related to the progress of obtaining a clinical permit.</p>
<p>Employment Issues related to Labor Strike for PT Gersindo Minang Plantation on Websites/Online Media.</p> <p>https://www.suaraburuhnasional.com regarding worker strike in PT GMP</p>	<p>The union (SARBUKSI) has statement that related demonstration occurred because the union felt that the harvest wages given so far were still below standard and the base given was quite high. However, after the demonstration activity in April 2022 which was carried out by workers and unions, the company has provided an explanation regarding this matter and has made several improvements such as:</p> <ul style="list-style-type: none"> ● Raised the abnormal fruit reward from the previous one. ● Explains the increase in base which turned out to be increasing due to the age of the plant and its increased productivity. ● Raise the price of loose fruits. <p>From the improvements mentioned above, union and members have agreed not to carry out demonstration activities again and agree to this. This improvement has been felt by the union and other workers until the audit activity took place. Regarding the issue of demonstrations that occurred in 2022, the unions clarified it and declared it had been completed.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p style="text-align: center;">Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Gersindo Minang Plantation Group Estate Manager</p>  <p>Indra Arman Monday, 23 January 2023</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p>Moh Arif Yusni Monday, 23 January 2023</p> </div> </div>

Appendix 1. List of Stakeholder Contacted in the RSPO Certification Process							
No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Plantation Agency	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	16 January 2023	✓	
2	Manpower Office	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	16 January 2023	✓	
3	Environmental Agency	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	16 January 2023	✓	
4	ATR/BPN	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	16 January 2023	✓	
5	National Land Agency , West Pasaman	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	16 January 2023	✓	
6	Environmental Agency	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	16 January 2023	✓	
7	Labour Agency	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	16 January 2023	✓	
8	TBS Supplier - (MYJ)	Pasaman Barat Regency, Sumatra Barat Province	-	By Phone	18 January 2023	✓	
9	TBS Supplier - (Alih)	Pasaman Barat Regency, Sumatra Barat Province	-	By Phone	18 January 2023	✓	
10	Comitee Gender PHP 1	Pasaman Barat Regency, Sumatra Barat Province	-	Direct Interview	18 January 2023	✓	
11	Cooperation PHP 1	Pasaman Barat Regency, Sumatra Barat Province	-	Direct Interview	18 January 2023	✓	
12	Labour Union PHP 1	Pasaman Barat Regency, Sumatra Barat Province	-	Direct Interview	18 January 2023	✓	
13	Serikat Buruh Perkebunan Indonesia / SERBUNDO (Labor Union) of PT PHP	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	17 January 2023	✓	
14	Community Leader (Ninik Mamak and Datuk) of Nagari Kapa	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	18 January 2023	✓	
15	Community Leader (Ninik Mamak, Datuk and Kerapatan Adat Nagari/KAM) of Nagari Kapa	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	18 January 2023	✓	
16	Community Leader (Ninik Mamak, Datuk and Kerapatan Adat Nagari/KAM) of Nagari	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	18 January 2023	✓	
17	Ninik Mamak Tanjung Pangkal (Datuk Sultan Majolelo), Kenagarian Lingkung Aur.	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	17 January 2023	✓	
18	Lingkung Aur 2 Village Unit Cooperative (Koperasi Unit Desa/KUD).	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	17 January 2023	✓	
19	Permata Sawit Maligi Cooperative.	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	17 January 2023	✓	
20	Mutiara Bosa Sikilang Multi-Business Cooperative	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	17 January 2023	✓	

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
	(Koperasi Usaha/KSU). Serba						
21	Kenagarian Maligi.	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	17 January 2023	✓	
22	Bina Tani Sejahtera Cooperative.	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	17 January 2023	✓	
23	Kenagarian Lingkung Aur Hili.	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	17 January 2023	✓	
24	SARBUKSI – Serikat Buruh Industri Perkebunan Sawit Indonesia (Worker Union).	PT Gersindo Minang Plantation	-	Interview	17 January 2023	✓	
25	CV Dian RP (Local Contractor).	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	17 January 2023	✓	
26	SPSI – Serikat Pekerja Seluruh Indonesia (Worker Union).	PT Gersindo Minang Plantation	-	Interview	17 January 2023	✓	
27	Kenagarian Kapa.	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	18 January 2023	✓	
28	Kapa Village Unit Cooperative (Koperasi Unit Desa/KUD).	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	18 January 2023	✓	
29	Rantau Pasaman Village Unit Cooperative (Koperasi Unit Desa/KUD).	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	18 January 2023	✓	
30	Kenagarian Sikilang.	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	18 January 2023	✓	
31	Ninik Mamak Maligi (Datuk Majalelo Maligi), Kenagarian Maligi.	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	18 January 2023	✓	
32	Ninik Mamak Sikilang (Datuk Bosa Sikilang), Kenagarian Sikilang.	Pasaman Barat Regency, Sumatra Barat Province	-	Interview	18 January 2023	✓	
33	GMP Palm Oil Mill • 1 WTP operator • 1 methane capture plant operator	Pasaman Barat District. Sumatra Barat Province	-	Interview		✓	
34	GMP Estate • 2 welder • 1 mechanical • 1 storage operator • 1 hazardous storage operator • 1 LA operator	Pasaman Barat District. Sumatra Barat Province	-	Interview		✓	
35	PHP I Estate • 1 welder • 1 mechanical • 1 storage operator • 1 hazardous storage operator • 1 rinse house worker	Pasaman Barat District. Sumatra Barat Province	-	Interview		✓	

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
36	PHP II Estate <ul style="list-style-type: none"> • 2 people in emplacement area • 1 daycare worker • 1 nurse • 2 storage operator • 1 hazardous storage operator 	Pasaman Barat District. Sumatra Barat Province	-	Interview		✓	
37	WWF	Jakarta	wwf-indonesia@wwf.or.id	E-mail	9 January 2023		✓
38	WALHI	Jakarta	informasi@walhi.or.id	E-mail	9 January 2023		✓
39	AMAN	Jakarta	rumahaman@cbn.net.id	E-mail	9 January 2023		✓
40	Sawit Watch	Bogor	info@sawitwatch.or.id	E-mail	9 January 2023		✓

Appendix 2. Assessment Program

DATE	16 – 20 January 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 16 January 2023		
06.00 – 07.30	JAKARTA → PADANG	All Auditor
08.30 – 12.00	PADANG → PT GERSINDO MINANG PLANTATION	MAY / RIU
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	<ul style="list-style-type: none"> • Verification of Basic Information Mill and Estate • Confirmation of Time Bound Plan • Review of Partial Certification 	
08.30 – 11.00	PADANG → PASAMAN BARAT DISTRICT	BEN / ALS
11.00 – 15.00	Public consultation with stakeholder to relevant agency in Pasaman Barat District	
15.00 – 16.00	PASAMAN BARAT → PT GERSINDO MINANG PLANTATION	
Tuesday, 17 January 2023		
08.00 – 12.00	Stakeholder Consultation <ul style="list-style-type: none"> • Stakeholder consultation to affected communities surrounding the plantations and previous land owner 	RIU
08.00 – 12.00	Field Observation to GMP Estate and PHP 2 Estate Aspect to be verified : <ul style="list-style-type: none"> • Implementation of Legal Aspect (Land Ownership, Legal Boundaries); • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) • Implementation of Occupational Health & Safety Aspect • Implementation of Employment Procedure and Mechanism Aspect • Observation of Workers Facilities (Housing, School, Worship Place). 	<ul style="list-style-type: none"> • MAY / ALS • BEN • MAY / ALS • BEN • MAY / ALS • MAY / ALS
12.00 – 14.00	Break	

DATE		16 – 20 January 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR	
14.00 – 16.30	Field observation to GMP POM: <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO) Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond) Implementation of Employment Procedure and Mechanism Aspect 	<ul style="list-style-type: none"> RIU / ALS / MAY MAY / RIU 	
14.00 – 16.30	Interview with Gender Committee, Worker’s Union, Worker’s Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier	BEN	
16.30 – 17.00	Presentation of Daily Progress	All Auditor	
Wednesday, 18 January 2023			
08.00 – 12.00	Stakeholder Consultation <ul style="list-style-type: none"> Stakeholder consultation to affected communities surrounding the plantations and previous land owner 	MAY	
08.00 – 12.00	Field Observation to PHP 1 Estate Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). 	<ul style="list-style-type: none"> RIU / ALS BEN 	<ul style="list-style-type: none"> RIU / ALS BEN RIU / ALS RIU / ALS
12.00 – 14.00	Break		
16.00 – 17.00	<ul style="list-style-type: none"> Verification of stakeholder consultation result and field visit. Document review and completing audit checklist. 	All Auditor	
16.15 – 17.00	<ul style="list-style-type: none"> Presentation of Daily Progress 		
Thursday, 19 January 2023			
08.00 – 12.00	<ul style="list-style-type: none"> Continued virtual field observation and Public Consultation . Document review and completing audit checklist. 	All Auditor	
12.00 – 14.00	<ul style="list-style-type: none"> Break 		

DATE	16 – 20 January 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
16.00 – 17.00	<ul style="list-style-type: none"> • Verification of stakeholder consultation result and field visit. • Document review and completing audit checklist. 	All Auditor
16.15 – 17.00	<ul style="list-style-type: none"> • Presentation of Daily Progress 	
FRIDAY, 20 January 2023		
08.00 – 10.00	Internal discussion by auditor team preparing for Closing Meeting	All Auditor
10.00 – 12.00	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 	
12.00 – 16.00	PT Gersindo Minang Plantation → Padang	
17.00 -	Padang → Jakarta	