

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

**[✓] Surveillance**

Name of Management Organisation : **Gawi Bahandep Sawit Mekar Palm Oil Mill, PT Gawi Bahandep Sawit Mekar subsidiary of Triputra Agro Persada**

Plantation Name : PT Gawi Bahandep Sawit Mekar: Estate 1, Estate 2 and Estate 3

Location : Village of Jahitan, Sub District of Seruyan Hilir, District of Seruyan, Province of Kalimantan Tengah, Indonesia.

Certificate Code : **MUTU-RSPO/138**

Date Initial Registration : 16 July 2014

Date of Certificate Issue : 28 November 2019      Date of License Issue : 28 February 2023

Date of Certificate Expiry : 27 November 2024      Date of License Expiry : 27 November 2023

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.3	7 to 11 November 2022	Hasiholan Sihombing (Lead Auditor), Rahmat Abdiansyah, Sentot Adi Subandono and Mia Rahmah Qadryani	Briyogi Shadiwa	Octo HPN Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.3	14 February 2023

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Figure 1. Location Map of PT. Gawi Bahandep Sawit Mekar

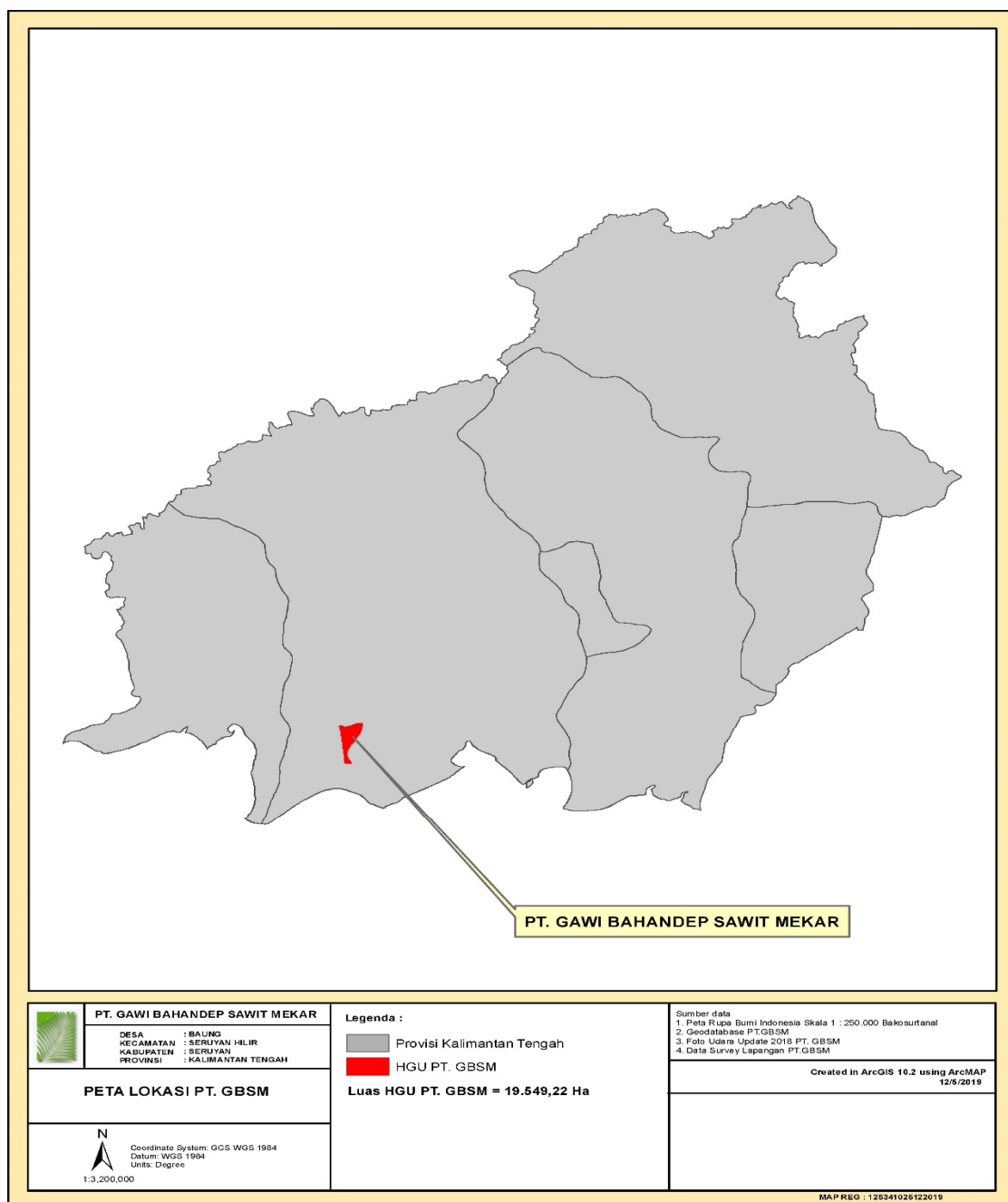
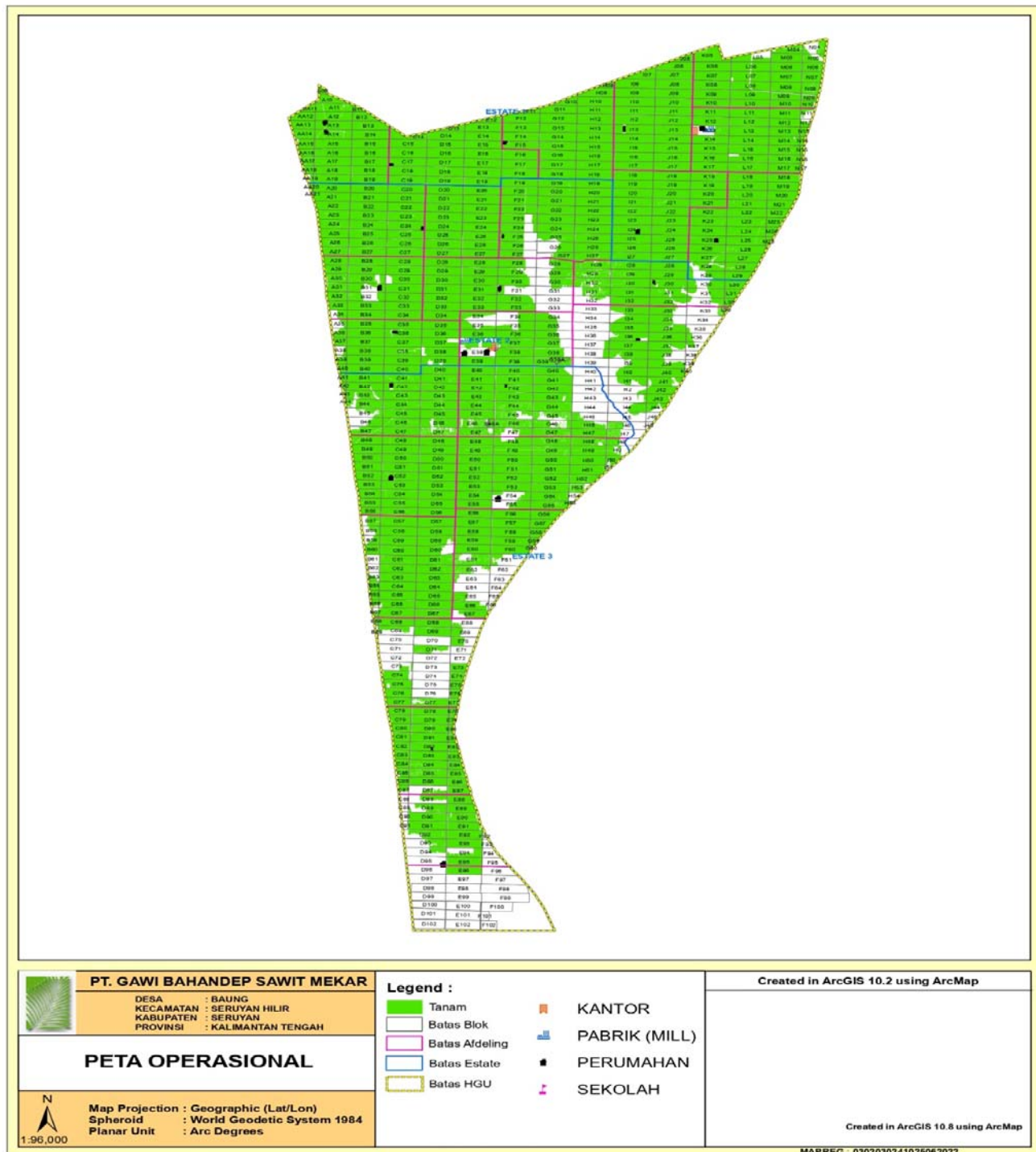


Figure 2. Operational Map of PT. Gawi Bahandep Sawit Mekar



## Abbreviations Used

ASA	:	Annual Surveillance Assessment
BMP	:	Best Management Practices
BMS	:	BGA Manuring System
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> / Social Security Agency
CD	:	Community Development
CH	:	Certificate Holder
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
DPPL	:	Environmental Management and Monitoring Documents
EFB	:	Empty Fruit Bunch
EIA	:	Environment Impact Assessment
EMPID	:	Employee Identity
FFA	:	Free Fatty Acid
FFB	:	Fresh Fruit Bunch
FPIC	:	Free Prior Informed Consent
GBSM	:	Gawi Bahandep Sawit Mekar
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Permit)
HCV	:	High Conservation Value
HRD	:	Human Resource Department
HSE	:	Health, Safety and Environment
HIRAC	:	Hazard Identification and Risk Assessment Control
IDR	:	Indonesian Rupiah
ILO	:	International Labour Organization
IPM	:	Integrated Pest Management
IPAL	:	<i>Instalasi Pengelolaan Air Limbah</i> (Waste Water Treatment Plant)
ISPO	:	Indonesian Sustainable Palm Oil
LUCA	:	Land Uses Change Analysis
KER	:	Kernel Extraction Rate
KUD	:	Koperasi Unit Desa ( <i>village cooperative</i> )
MSDS	:	Material Safety Data Sheet
NPP	:	New Planting Procedure
OER	:	Oil Extraction Rate
OFI	:	Opportunity for Improvement
OHS	:	Occupational Health and Safety
PK	:	Palm Kernel
P2K3	:	Panitia Pembina Keselamatan dan Kesehatan Kerja/OHS Committee
PerkimLH	:	Regency, Housing and Settlement Areas and the Environment Agency
PK	:	Palm Kernel
PKB	:	<i>Perjanjian Kerja Bersama</i> /Collective Labour Agreement
PKWT	:	<i>Perjanjian Kerja waktu Tertentu</i> /Specified Time Work Agreement
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
RKL RPL	:	<i>Rencana Pengelolaan Lingkungan - Rencana Pemantauan Lingkungan</i> (Environment

		Management and Monitoring Plan)
RSPO	:	Roundtable and Sustainable Palm Oil
RTE	:	Rare, Threatened, Endangered
SCCS	:	Supply Chain Certification System
SIA	:	Social Impact Assessment
SKU	:	<i>Syarat Kerja Umum</i> /Permanent Worker
SKU-B	:	<i>Syarat Kerja Umum Bulanan</i> /Monthly Permanent Worker
SKU-H	:	<i>Syarat Kerja Umum Harian</i> /Daily Permanent Worker
SOP	:	Standard Operational Procedure
SPK	:	<i>Surat Perjanjian Kerja</i> /Letter of agreement
SPM	:	<i>Serikat Pekerja Mandiri</i> (Independent Worker Union)
SPSI	:	<i>Serikat Pekerja Seluruh Indonesia</i> (Worker Union)
TAP	:	Triputra Agro Persada
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plan

1.0	SCOPE OF THE CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used		
		<ul style="list-style-type: none"><li>• RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20<sup>th</sup> April 2020.</li><li>• RSPO Certification Systems for Principles &amp; Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020</li></ul>	
1.2	Organisation Information		
1.2.1	Organization name listed in the certificate	PT Gawi Bahandep Sawit Mekar subsidiary of PT Triputra Agro Persada	
1.2.2	Contact person	Dian Novita Putri	
1.2.3	Organisation address and site address	RSPO registered company: Gedung The East 23 Floor, Jl. DR Ide Anak Agung Gde Agung Kav E 3.2 No.1 Jakarta Selatan, Indonesia.  <u>Liaison Office:</u> Jl. Sawit Raya 1 No 2 RT 02 RW 01 Mentawa Baru Ketapang Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia.	
1.2.4	Telephone	021 – 5794 4737	
1.2.5	Fax	021 – 5794 4745	
1.2.6	E-mail	<a href="mailto:dian.putri@tap-agri.com">dian.putri@tap-agri.com</a>	
1.2.7	Web page address	<a href="http://www.tap-agri.com">www.tap-agri.com</a>	
1.2.8	Management Representative who completed the application for certification	George Oetomo	
1.2.9	Registered as RSPO member	1-0038-07-000-00, 27 June 2007	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill (Gawi Bahandep Sawit Mekar Mill) and it's supply base, i.e.: Estate 1, Estate 2 and Estate 3	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			LatitudeLongitude
	Gawi Bahandep Sawit Mekar Mill	Jahitan Village, Seruyan Hilir Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	S 02° 57' 00"E 112° 20' 55"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			LatitudeLongitude
	Estate 1	Baung Village, Seruyan Hilir Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	S 02° 88' 25"E 112° 31' 40"
	Estate 2	Baung and Jahitan Village, Seruyan Hilir Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	S 02° 95' 23"E 112° 35' 49"

	Estate 3	Jahitan and Muara Dua Village, Seruyan Hilir Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia		S 02° 95' 23"	E 112° 35' 49"
1.5	Description of Area Statement				
1.5.1	Tenure				
	• State			19,594.22 ha	
	• Community			- ha	
1.5.2	Area Statement				
	Area Statement	Estate 1 (Ha)	Estate 2 (Ha)	Estate 3 (Ha)	Total (Ha)
	Mature area	5,392.93	5,138.46	4,940.23	15,471.62
	Mill	-	8.19	-	8.19
	New Mill in Estate 1	13.00	-	-	13.00
	Emplacement and Office	20.69	52.67	9.82	83.18
	Road and Bridge	193.95	217.77	288.14	699.86
	Ditch and River	66.81	93.08	130.95	290.84
	HCV	7.53	404.65	57.89	470.07
	HCS	-	21.64	40.09	61.73
	Pond ( <i>Embung</i> )	0.10	0.95	0.17	1.22
	Swamp	28.55	95.5	51.51	175.56
	Potential Planted Area (reserve area)	19.08	661.75	1558.6	2,239.43
	Non-Compensated Area	12.16	37.70	0.12	49.98
	Nursery	-	-	29.54	29.54
	Total area	5,754.80	6,732.36	7,107.06	19,594.22
1.6	Planting Year and Cycles				
1.6.1	Age profile of planting year				
	Planting Year	Hectarage (ha)			Total (ha)
		Estate 1	Estate 2	Estate 3	
	2006	1,038.64	757.09	-	1,795.73
	2007	2,634.73	1,129.69	-	3,764.42
	2008	653.91	219.66	-	873.57
	2009	24.09	-	-	24.09
	2010	336.40	2,231.52	144.10	2,712.02
	2011	410.13	347.46	2,699.57	3,457.16
	2012	91.13	289.49	886.97	1,267.59
	2013	202.31	72.19	619.58	894.08
	2014	-	44.46	326.76	371.22
	2015	1.59	37.38	263.25	302.22
	2016	-	9.52	-	9.52
	TOTAL	5,392.93	5,138.46	4,940.23	15,471.62
1.6.2	New Planting area after January 2010			9,013.81 ha	
1.6.3	Planting Cycle			1 <sup>st</sup> Cycle	
1.7	Description of Mill and Supply Base				
1.7.1	Description of Mill				
	Name of Mill	Capacity	FFB	CPO	Palm Kernel



		(tonnes/ hour)	Processed (tonnes/year)	Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Gawi Bahandep Sawit Mekar Mill	75	349,195.88	76,903.23	22.02	16,928.61	4.85
	<i>*Production data source from October 2021 to September 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)	%
	Estate 1	5,754.80	5,392.93	123,193.79	22.84	30,733.87	24.95
	Estate 2	6,732.36	5,138.46	114,706.44	22.32	114,695.90	99.99
	Estate 3	7,107.06	4,940.23	104,584.82	22.17	104,584.82	100.00
	TOTAL	19,594.22	15,471.62	342,485.05	22.14	250,014.59	73.00
	<i>*Production data source from October 2021 to September 2022</i>						
	<i>**another FFB from Estate 1 and Estate 2 sent to another Mill (not certified) in TAP Group.</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 (ton/year)		
	PT Mega Ika Khansa (RSPO Non-Certified)	PT Mega Ika Khansa – TAP Group	-	2,144.93	49,557.51		
	Usaha Mandiri Cooperative (RSPO Non-Certified)	Plasma of PT GBSM	1,246	202.97	566.14		
	PT Salonok Ladang Mas (RSPO Non-Certified)	Independent Supplier	-	-	2,788.61		
	Ramp Sebabi (RSPO Non-Certified)	Independent Supplier	-	-	23,372.52		
	Marjan (RSPO Non-Certified)	Independent Supplier	-	-	637.00		
	Rudiyanto (RSPO Non-Certified)	Independent Supplier	-	-	4,644.00		
	CV Kaisa Sinar Mutiara (RSPO Non-Certified)	Independent Supplier	-	-	8,714.50		
	Tamauli Ginting (RSPO Non-Certified)	Independent Supplier	-	-	4,061.75		
	Deny Hendaryono (RSPO Non-Certified)	Independent Supplier	-	-	1,036.00		
	Abdul Jafar (RSPO Non-Certified)	Independent Supplier	-	-	1,260.25		
	Hasan Efendy (RSPO Non-Certified)	Independent Supplier	-	-	1,483.00		
	Ardiyan (RSPO Non-Certified)	Independent Supplier	-	-	1,023.50		
	TOTAL					99,144.78	
	<i>*Production data source from October 2021 to September 2022</i>						
1.7.4	Product categories		FFB, CPO, PK				
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (October 2021 to September 2022) (MT)		
	FFB Processed		323.000		250,014.59		

	CPO Production		74,750		56,014.99			
	Palm Kernel (PK) Production		16,250		12,136.28			
1.8.2	Product selling							
	Type of selling product	Actual selling product period (October 2021 to September 2022) (MT)						
	CSPO sold as RSPO certified product	0						
	CSPK sold as RSPO certified product	3,600.00						
	CSPO sold under another scheme	0						
	CSPK sold under another scheme	0						
	CSPO sold as conventional	54,337.82						
	CSPK sold as conventional	7,865.00						
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates	Total Area (ha)	Production Area (ha)	FFB (tones/year)	Yield (tones/ha/year)			
	Estate 1	5,754.80	5,392.93	130,000	24.11			
	Estate 2	6,732.36	5,138.46	120,000	23.35			
	Estate 3	7,107.06	4,940.23	110,000	22.27			
	TOTAL	19,594.22	15,471.62	360,000	23.27			
	<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 Out put (tones)	Extraction (%)	Palm Kernel Out put (tones)	Extraction (%)	Supply Chain Module
	GBSM POM	75	360,000	79,500	22.08	17,500	4.86	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			-				
	ISPO			Certificate ISPO No. IUS-ISPO-20190001 valid thru 21 August 2024				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	Mill	Time Bound Plan						
	Brahma Bina Bakti	2015	PT Brahma Binabakti	2015	Jambi	Certified		
			KUD Dano Bangko	2024		HCV HCS Integrated process		
			KUD Akso Dano	2023		HCV HCS Integrated process		
			Braham Bina Bakti – non	2023		-		

		certified			
Gawi Bahandep Sawit Mekar Mill 1	2015	PT Gawi Bahandep Sawit Mekar (Estate 2 and Estate 3)	2014	Central Kalimantan	Certified
		PT Mega Ika Khansa	2024		Legal status still location permit
		Usaha Mandiri Cooperative	2024		-
Gawi Bahandep Sawit Mekar Mill 2 (New Mill Commissioning 2022)	2024	PT Gawi Bahandep Sawit Mekar (Estate 1)	2014		-
		PT Mega Ika Khansa	2024		Legal status still location permit
First Lamandau Timber International	2023	PT First Lamandau Timber International	2023	Central Kalimantan	Stage 2
		Cooperative of Natai Pelingkau	2025		-
		Cooperative of Guna Wahana Sejahtera	2025		-
		Cooperative of Karya Sehati	2025		-
		Cooperative of Kepakat Di'i	2025		-
Sukses Karya Mandiri	2025	PT Sukses Karya Mandiri	2025	Central Kalimantan	-
		PT Trieka Agro Nusantara	2026		
		Cooperative of Jati Sejahtera	2028		-
		Cooperative of Bina Belantara	2027		-
PT Muaratoyu Subur Lestari	2023	PT Muaratoyu Subur Lestari	2023	East Kalimantan	-
		Cooperative of Samakeo Lestari – Munggu	2025		-
		Cooperative of Swadaya Toyu-Toyu	2025		-
		Cooperative of Mupakat Taka & Mantorani Mandiri Taka - Tualan	2025		-
PT Etam Bersama Lestari	2023	PT Etam Bersama Lestari	2023	East Kalimantan	-
		PT Dwiwira Lestari Jaya – Estate 2	2023		
		Cooperative of Tunas Harapan Jaya	2026		-
		Cooperative of Tepian Terap Lestari	2026		-
PT Dwiwira Lestari Jaya	2024	PT Dwiwira Lestari Jaya – Estate 1	2024	East Kalimantan	-
		Cooperative of Sawit Sejahtera	2027		-
		Cooperative of Biatan Sejahtera	2027		-
PT Hamparan Perkasa	2023	PT Hamparan Perkasa Mandiri	2023	East Kalimantan	-

Mandiri		KUD Nengayetna	2024		HCV HCS Integrated process
		PT Subur Abadi Wana Agung	2025		HCV HCS Integrated process
		KUD Mandiri Sawa	2026		HCV HCS Integrated process
		KUD Maju Bebaya	2026		HCV HCS Integrated process
		PT Kutim Agro Mandiri	2025		Legal status still location permit
		Cooperative of Mitra Sawit Mandiri Sukses	2028		-
		PT Pradana Telen Agromas	2025		Legal status still location permit
		Koperasi Kimet Maring Telen Agromas	2028		-
PT Natura Pasific Nusantara	2026	PT Natura Pasific Nusantara	2026	East Kalimantan	-
		Cooperative of Akung Di Uhay	2029		-
		Cooperative of Ora Et Labora	2029		-
		Cooperative of Bukit Karya	2029		-
PT Yudha Wahana Abadi	2025	PT Yudha Wahana Abadi	2025	East Kalimantan	-
		Cooperative of Harapan Baru	2029		-
		PT Genera Aura Semari	2026		Legal status still location permit
PT Anugerah Agung Prima Abadi	2026	PT Anugerah Agung Prima Abadi	2026	East Kalimantan	-
		Cooperative of Belum Lukut	2029		-
		Cooperative of Tumbu Bebaya	2029		-
PT Kedap Sayaaq Dua	2026	PT Kedap Sayaaq Dua	2026	East Kalimantan	-
		Cooperative of Bina Mitra Sawit Sejahtera & Sempakat Sawit Mandiri	2029		HCV HCS Integrated process
		Cooperative of Damai Sejahtera mandiri – Muara Jawaq	2029		HCV HCS Integrated process
		Cooperative of Karya Mandiri-Abit	2029		HCV HCS Integrated process

*TBP revised on 3 October 2022 and has been sent to RSPO, but there is still no approval from RSPO.*

The company shows the Time Bound Plan for all management units of the subsidiary of Triputra Agro Persada Tbk which has been updated on 3 October 2022 where there are Uncertified Units that are planned to be certified past June 30, 2023. Based on the RSPO Certification System 2020 clause 5.5.2 it is known that the exception period is outside the period maximum Time Bound Plan must obtain approval from the RSPO Secretariat. Based on the announcement for the Time Bound Plan from RSPO on 21 December 2021, RSPO members must be certified no later than 5 years starting from the effective RSPO Certification System from 1 July 2018 (until 30 June 2023). The company has shown proof of sending an

	email to the RSPO regarding changes to the Time Bound Plan Uncertified Unit that exceeds 30 June 2023, but until this audit is completed the company has not been able to show evidence that the Time Bound Plan has received approval from the RSPO. So, this becomes Non-conformity No. 2022.06 with minor category.
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard
	Plasma of PT GBSM (Usaha Mandiri Cooperative) is full managed by the company and planned to be certified in 2024.

<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>ASA-1.3</b>	<p>1. <b>Hasiholan Sihombing (Lead Auditor)</b>. Indonesian citizen. Bachelor of Agriculture Majoring in Agronomy, Agriculture Faculty. He has working experienced for 7 (seven) years since 2009 as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The training he has followed namely: Lead Auditor ISPO in 2016, RSPO P&amp;C Lead Auditor Course in 2018, RSPO Supply Chain Certification Lead Auditor Course in 2020, SA 8000 Awareness in 2018, Quality Management Systems (ISO 9001:2015) in 2016, Environmental Management Systems (ISO 14001:2015) in 2017, OHS General Expert in 2013, OHSAS 18001:2007 in 2017, ISO 19011:2018 in 2019, ISO 17021:2011 and ISO 17065:2012 in 2016. During this audit, he assigned to verify legal aspect, land dispute, Worker Welfare and SCCS.</p> <p>2. <b>Rahmat Abdiansyah (Auditor)</b>. Indonesian citizen. Bachelor of Forestry from IPB University, with major in Forest Resources Conservation and Ecotourism. Has experience working in the Indonesian Palm Oil Farmers Organization and Indonesian private oil palm plantation companies. Participate in ISPO and RSPO Internal Auditor training in 2018, ISPO and P&amp;C Certification Systems IHT in 2019, IHT ISO 19011, ISPO Auditor Training in 2020, RSPO Lead Auditor Training in 2020, ISO 14001 and ISO 9001 Lead Auditor Training in 2020, and awareness of the RSPO Certification System and the RSPO P&amp;C in 2019 and 2020. During this assessment, he verified the aspects of environment, conservation and GHG aspect.</p> <p>3. <b>Sentot Adi Subandono (Auditor)</b>. Indonesia citizen, Bachelor of Agriculture, Department of Agricultural Cultivation. He has five years of experience working since 2005 as Plantation Operational Staff and nine years as Internal Auditor in private oil palm plantations in Indonesia. The training that has been attended includes the Basic Management Development Program of Palm Oil Plantation, Use of Limited Pesticides, Best Practices in Internal Auditing, Fraud Auditing: Prevention, Detection, and Investigation, Operational Risk Approach in Internal Auditing, General Occupational Health and Safety Expert, ISPO Auditor Training in 2016, ISO 9001: 2015, RSPO Lead Auditor Training in 2021, and SMETA training awareness. During this assessment, verified the aspects of Best Management Practices, Transparencies and OHS Aspect.</p> <p>4. <b>Mia Rahmah Qadryani (Auditor Trainee)</b>. Indonesian citizen. Bachelor of Agriculture Majoring in Pest and Plant Disease, Universitas Padjadjaran. The training she has followed namely: ISO 9001 in 2021, ISO 19011 in 2021, Auditor ISPO in 2022, Awareness ISO 17021 in 2021, Awareness ISO 17065 in 2021, Awareness ISO 9001 in 2021, Awareness ISO 14001 in 2021, Awareness ISO 45001 in 2021, and Awareness ISO 19011 in 2021. She has participated in several audit simulation activities related to the social and worker welfare. During this audit, she verified Worker Welfare and Transparencies 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>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
<b>ASA-1.3</b>	<p>Number of auditors: 3 auditors and 1 trainee auditor</p> <p>Number of days for <b>ASA-1.3</b> Audit: 5 days</p> <p>Number of working days for <b>ASA-1.3</b> Audit: 15 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>ASA-1.3</b>	<p>The assessment was conducted by measuring the implementation of certification system and standard conducted by PT Gawi Bahandep Sawit Mekar, GBSM POM Unit Certification based on:</p> <ul style="list-style-type: none"> <li>• RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20<sup>th</sup> April 2020</li> <li>• RSPO Certification Systems for Principles &amp; Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020</li> </ul> <p>The scope of certification of PT Gawi Bahandep Sawit Mekar consist of one mill (GBSM POM) and three estates (Estate 1, Estate 2 and Estate 3).</p> <p>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 ASA-1.3 by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment. Improvement of findings from ASA-1.2 findings were observed by auditors at this assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.3.

The opening meeting was held on 7 November 2022. As for the participants who attended the online opening meeting included the General Manager, Estate and Mill Managers, Sustainability staff, Support Team from Jakarta and other staff. Closing meeting was held on 11 November 2022 attended by the same participants as the opening meeting. Management PT Gawi Bahandep Sawit Mekar accept all this audit results.

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

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

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

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

The assessment program please find Appendix 2.

### 2.2.3 Locations of Assessment

#### ASA-1.3

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:

#### GBSM POM

- **Security Post.** Observation and interview related to OHS, worker welfare, and ethic.
- **Weighbridge.** Observation and interview related to work procedure, OSH, worker welfare, and ethic.
- **Hazardous Waste Temporary Storage.** Observations and interviews with officers related to work procedures, OHS, wages and environmental management.
- **Spare part Warehouse.** Field observations and interview related spare part management, OHS, and environmental aspect.
- **Chemical and oil warehouse.** Field observations and interview related chemical management, OHS, and environmental aspect.
- **Workshop.** Field observations workshop activity, OHS, environmental and worker welfare aspect.
- **Fuel tank.** Observation and interview related to OHS and waste management



- **Dispatch CPO.** Field observation related to supply chain, OHS, environmental and worker welfare aspect.
- **WTP.** Field observations water treatment activity, OHS, environmental and worker welfare aspect.
- **WWTP.** Field observations related to WWTP entry, runoff, effluent testing. Officers are equipped with PPE and effluent discharge records.
- **Hydrant simulation.** Observation of preparedness of fire emergency response teams and preparedness of emergency response devices.
- **Employee Housing.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, educational facilities, religious facilities, health facilities and sports facilities.
- **Empty Bunch Press.** Observations related to material handling, OHS and environmental management.
- **Water Source Reservoir.** Observations and interviews related to water management, recording of water use, health checks, PPE and waste management.
- **Composting station.** Observations and interviews related to EFB management, employment, health checks, OHS, PPE and EFB composting management.
- **Sortation.** Observation and interviews with workers and Wheel loader operator related to labor, OHS, environment, ethical, and social aspect.
- **Sterilizer Station.** Observation and interviews with workers related to labor, OHS, environment, and social aspect.
- **Press station.** Observation and interviews with workers related to labor and OHS aspect.
- **Kernel station.** Observation and interviews with workers related to labor and OHS aspect.
- **Laboratory station.** Observation and interviews with workers related to labor and OHS aspect.
- **Engine room.** Observation and interviews with workers related to labor and OHS aspect.
- **Boiler station.** Observation and interviews with workers related to labor and OHS aspect.

### Estate 1

- **Block M19 Division J: HGU Pole No. 48.** Observation the conditions and position of legal boundary.
- **Block M21 Division J: HGU Pole No. 49.** Observation the conditions and position of legal boundary.
- **Fertilizer Warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Agrochemicals Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Spare part warehouse.** Observation minimum stock of PPE.
- **Hazardous Waste Temporary Storage.** Observations and interviews with officers related to work procedures, OHS, wages and environmental management.
- **Fuel tank.** Observation and interview related to OHS and waste management
- **Workshop.** Observations and interviews with officers related to material handling, work procedures, OHS, wages and environmental management.
- **Housing Area, Division D and I.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, and electricity facility.
- **Daycare, Division D and I.** Observations and interviews with workers related to labor and OHS aspects.
- **Rinse House.** Observation for spraying and manuring team facilities and also safety aspect.
- **Generator House** Observation and interview related to OSH, worker welfare and waste management
- **Pheromone trap, Block I27, Division OH.** Observation related IPM aspect.
- **Water reservoir for filling the Division OH Housing, Block I25.** Observation related OHS and environment aspect.
- **Harvesting, Block I25, Division OH (1 harvester).** Field observation related OHS aspect.
- **Manuring, Block J24, Division OH (1 foremen & 4 worker).** Field observation and interview with
- **Manuring with Fertilizer Spreader, Block L25 Division OJ (1 operator & 2 worker).** Observation and interviews with workers related to labor, OHS, environment, and social aspect.
- **Fire tower, Block L15 Division OI and Block K12 Division OE.** Observations related to fire monitoring management.
- **EFB application, Block L12 Division OI.** Observation related organic fertilizer aspect.



- **Subsidence Pole, Block K09 Division OE.** Observation related peat management.
- **Barn Owl Box, Block J12 Division OD.** Observation related IPM aspect.
- **Bakung River, Block F14/15.** Observation related environment aspect.
- **Harvesting Block F11-F14, Division OC (1 harvester).** Observation and interviews with workers related to labor, OHS, environment, and social aspect
- **Spraying worker, Block C16 (2 worker).** Observation and interviews with workers related to labor, OHS, environment, and social aspect
- **FFB Transport, Block F15 Division OC.** Field observation related OHS aspect
- **EFB Grading, Block C14.** Field observation related OHS aspect.

### Estate 2

- **Fertilizer Warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Agrochemicals Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Spare part warehouse.** Observation minimum stock of PPE.
- **Firefighting warehouse and simulation of firefighting equipment.** Observation related to OHS and firefighting facilities and emergency simulations.
- **Clinic.** Observations and interviews of health, environmental, training, and employment facilities.
- **Workshop.** Observations and interviews with officers related to material handling, work procedures, OHS, wages and environmental management.
- **Hazardous Waste Temporary Storage.** Observations and interviews with officers related to work procedures, OHS, wages and environmental management.
- **Pesticide mixing area.** Observation related pesticide mixing area, PPE storage, safety aspect.
- **Rinse House.** Observation for spraying and manuring team facilities and also safety aspect.
- **Daycare, Division O and G.** Observations and interviews with workers related to labor and OHS aspects.
- **Housing Area, Division O, N, and G.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, and electricity facility.
- **Landfill, Block A35.** Observations related to domestic waste management, OHS, and environmental management.
- **Block A23/22: HGU Pole No. 151.** Observation the conditions and position of legal boundary.
- **Block AA20: HGU Pole No. 153.** Observation the conditions and position of legal boundary.
- **Block A26/25: HGU Pole No. 149.** Observation the conditions and position of legal boundary.
- **HCV Bakung River Riparian Area, Block H38.** Observation the implementation of management in HCV of riparian area.
- **Harvesting at Block E35/36.** Observation and interview with harvester related fruit ripeness, safe working practices and also worker welfare.
- **Block F36 (5 Pesticide Applicator).** Observation on safe working practices and interview with the spraying workers related type of pesticides use according to the procedure and also worker welfare.
- **Block B20 (5 Fertilizer Applicator).** Observation on safe working practices and interview with the manuring workers related type of fertilizer use according to the procedure and also worker welfare.
- **Land Application Block C32.** Observation of flatbed conditions, indications of POME spills or overflows, and interviews with workers regarding duties, responsibilities and labor aspects.
- **Peat subsidence Block G39.** Observation related tools of the decrease in peat level.
- **Data logger Block G39.** Observation related tools of the measuring ground water level.

### Estate 3

- **Block C75 Division X: HGU Pole No. 121.** Observation the conditions and position of legal boundary.
- **Block E28 Division Y: HGU Pole No. 87.** Observation the conditions and position of legal boundary.
- **Block E90 Division Z: HGU Pole No. 92.** Observation the conditions and position of legal boundary.

- **Block F92 Division Z: HGU Pole No. 93.** Observation the conditions and position of legal boundary.
- **Housing Area, Division V and T.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, and electricity facility.
- **Housing Area, Division X, Y and Z.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, and electricity facility.
- **Daycare, Division V and T.** Observations and interviews with workers related to labor and OHS aspects.
- **Daycare, Division X, Y and Z.** Observations and interviews with workers related to labor and OHS aspects.
- **Grabber tractor, Main Road.** Field Observation and interviews with operator related to labor and OHS aspect.
- **Water level in the trench, Block D42 Division OQ.** Observation related to water management aspect.
- **Antigonon leptosus, Block C59 Division OV.** Observation related to IPM aspect.
- **Spot Spraying, Block C60 Division OV.** Observation and interviews with workers related to labor, environment, social, and OHS aspect.
- **Barn Owl Box, Block C60 Division OV.** Observation related to IPM aspect.
- **Wood rub, Block C64 Division OV.** Observation and interviews with workers related to labor, environment, social, and OHS aspect.
- **Harvesting, Block C64 Division OV.** Observation and interviews with workers related to labor, environment, social, and OHS aspect.
- **Manuring, Block D40 Division OQ.** Observation and interviews with workers related to labor, environment, social, and OHS aspect.
- **Logger for water table monitoring, Block F43 Division OR.** Observation related to water table monitoring on peat management.
- **Subsidence pole, Block F43 Division OR.** Observation related to peat management.
- **Nursery, Block F55 Division OU.** Observation and interviews with workers related to labor, environment, social, and OHS aspect.
- **Rinse House, Block F55 Division OU.** Observations related to rinse house conditions and use.
- **Stop bund, Block D46 Division OQ.** Observation related to water management aspect.

2.3	<b>Stakeholder Consultation and Stakeholders Contacted</b>
2.3.1	<b>Summary of stakeholder consultation process.</b>
ASA-1.3	<p>Summary of stakeholder consultation process for PT Gawi Bahandep Sawit Mekar was held by:</p> <ul style="list-style-type: none"> <li>• Public Notification on website on RSPO and MUTU Website on 24 October 2022</li> <li>• Public consultation with NGOs (by email) such as WALHI, AMAN, and Sawit Watch on 19 October 2022</li> <li>• Public consultation meeting with government institution on 8 November 2022</li> <li>• Public consultation meeting with communities on 8 to 9 November 2022</li> <li>• Public consultation meeting with internal stakeholders and contractor on 8 to 9 November 2022</li> </ul> <p>Numbers of input from stakeholders were clarified by PT Gawi Bahandep Sawit Mekar.</p>
2.3.2	<b>Stakeholder contacted</b>
	<i>Please find appendix 1</i>
2.4	<b>Determining Next Assessment</b>
	The next visit (ASA-1.4) will be conducted eight (9) months to twelve (12) months after the 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 **Gawi Bahandep Sawit Mekar POM – PT Gawi Bahandep Sawit Mekar subsidiary of Triputra Agro Persada** operation consisting of one (1) mill and three (3) oil palm estates.

During the assessment, there were two (2) non-conformities were assigned against Major Compliance Indicators; four (4) non-conformities were assigned against Minor Compliance Indicators; and two (2) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective action(s) that had been reviewed and accepted by Auditor(s) in form of documentation evidence(s) e.g. (document record/photographic/etc). Those corrective action(s) taken that consist of two (2) non-conformities and four (4) non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that **Gawi Bahandep Sawit Mekar POM – PT Gawi Bahandep Sawit Mekar subsidiary of Triputra Agro Persada** complied with 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.**

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>	
<b>1.1</b>	<b>The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</b>
<b>1.1.1</b>	<p>Unit of certification showed SOP of information request handling (No. SOP/SUPP/V/2017/004 Rev. 03) validated on 8 May 2017 which explains the types of documents which are publicly accessible. These documents divided into two types, as follows:</p> <ul style="list-style-type: none"> <li>• Accessed without approval: Corporate Social Responsibility (CSR) matter, job vacancy, comparative study, apprentice, and human rights policies.</li> <li>• Accessed with approval: High Conservation Value (HCV) and environment management matters, occupational health and safety (OHS) management, commercial data, supplier and contractors data, manpower, land title, land compensation procedure, continuous improvement data, certification audit report, etc.</li> </ul> <p>These documents can be accessed by sending a request to the management. Based on the interview with Agencies of Seruyan District, they stated that if they needed information, they would contact the company through the mobile app or information request letter and the company responded and submitted mandatory report in accordance with its period.</p>
<b>1.1.2</b>	<p>Companies can show records of providing information to relevant agencies in the form of routine reports, for example:</p> <p><b>Plantation Legality</b></p> <ul style="list-style-type: none"> <li>• Plantation progress report (LPUP) of PT GBSM period of Triwulan III of 2022 has been sent to Plantation Agency of Seruyan District on 10 October 2022.</li> <li>• HGU utilization report of PT GBSM for the period of 2021 has been sent to Land Agency of Seruyan District on 5 January 2022.</li> </ul> <p><b>Environmental Aspects:</b></p>

- The report on the implementation of PT Gawi Bahandep Sawit Mekar's environmental management and monitoring plan for semester 1 of 2022 was reported to the Seruyan Regency Environment and Forestry Service on July 18, 2022. The company has also reported the report through the Environmental Electronic Reporting Information System with TTE Number 1658024318-4010.
- The report on management of hazardous and toxic waste for the 1st Quarter of 2022 by PT Gawi Bahandep Sawit Mekar was reported to the Seruyan Regency Environment and Forestry Service on April 11, 2022. The company has also reported the report through the Environmental Electronic Reporting Information System with TTE Number 1654482110-3853.
- Report on management of hazardous and toxic waste for Quarter 2 of 2022 PT Gawi Bahandep Sawit Mekar was reported to the Seruyan Regency Forestry and Environment Service on July 18, 2022. The company has also reported the report through the Environmental Electronic Reporting Information System with TTE Number 16577947105-3853.
- Report on management of hazardous and toxic waste for Quarter 3 of 2022 PT Gawi Bahandep Sawit Mekar has been reported to the Seruyan Regency Environment and Forestry Service on October 10, 2022. The company has also reported the report through the Environmental Electronic Reporting Information System with TTE Number 1663240332-3853.
- PT Gawi Bahandep Sawit Mekar's POME Monitoring Report for the 1st Quarter of 2022 was reported to the Seruyan Regency Environment and Forestry Service on May 10, 2022.
- PT Gawi Bahandep Sawit Mekar's POME Monitoring Report for the 2nd Quarter of 2022 was reported to the Seruyan Regency Environment and Forestry Service on July 18, 2022.
- PT Gawi Bahandep Sawit Mekar's POME Monitoring Report for Quarter 3 of 2022 was reported to the Seruyan Regency Environment and Forestry Service on October 20, 2022.
- Activity Report on Forest and Land Fire Management for the third quarter of 2022 was reported to the Seruyan Regency Food and Agriculture Security Service on October 10, 2022.

UoC also showed the mandatory report submitted related to worker welfare in accordance with its period, here as follows: Reporting of Employment Report for PT Gawi Bahandep Sawit Mekar via online in 2022 on 29 July 2022 and must be reporting back on 29 July 2023.

### BMP and OHS Aspect

- OHS Committee Report of PT Gawi Bahandep Mill Quarter 1 of 2022 to the UPT Sampit Labor Inspection Center in May 2022 which is equipped with the official stamp. (J&T May 10, 2022)
- OHS Committee report of PT Gawi Bahandep Mill Quarter 2 of 2022 to the UPT Sampit Labor Inspection Center in July 2022 which is equipped with an official stamp. (J&T July 18, 2022)
- OHS Committee Report of PT Gawi Bahandep Mill Quarter 3 of 2022 to the UPT Sampit Labor Inspection Center in October 2022 which is equipped with the official stamp. (J&T October 20, 2022)
- Report of OHS Committee of PT Gawi Bahandep Mill Quarter 1 of 2022 to the Office of Manpower and Transmigration of Central Kalimantan Province dated April 6 2022, accompanied by an official stamp. (J&T 06 April 2022)
- OHS Committee Report of PT Gawi Bahandep Mill Quarter 2 of 2022 to the Office of Manpower and Transmigration of Central Kalimantan Province dated 11 July 2022 accompanied by an official stamp. (J&T July 11, 2022)
- OHS Committee Report of PT Gawi Bahandep Mill Quarter 3 of 2022 to the Office of Manpower and Transmigration of Central Kalimantan Province dated 20 October 2022 which is accompanied by an official stamp. (J&T October 20, 2022)
- Report on the Activities of the Forest and Land Fire Management Unit to the Food and Agriculture Security Service of Seruyan Regency on 10 October 2022.

Based on the document review, all documents and information which are publicly accessible (mentioned in 1.1.1) are provided in Bahasa and understandable by each stakeholder.

### 1.1.3

Unit of certification showed SOP of communication (No. SOP/SUPP/V/2017/004 Rev. 03) validated on 8 May 2017 which explains the PIC of handling information, publicly accessible documents, the flow of handling information requests, and the maximum time limit of responding to the information request which is five days since the date of information request received.

UoC had recorded every requested information on a logbook of incoming and outgoing letters. Based on document verification, it was found that during 2021-2022 all incoming letters are requests for funds and the company has responded to the fund request. UoC

only showed outgoing letters which are the company's report to each stakeholder according to its period, not as the respond to incoming letters.

Based on the interview with villagers (Baung Village and Jahitan Village), they have understood mechanism of communication and consultation. Normally, headman of the village or communities would send a letter as a form of communication.

### 1.1.4

UoC also showed the record of the socialization regarding the SOP mentioned in 1.1.1 on 15 September 2022 attended by every stakeholder including contractor workers and communities. In addition, based on the interviews with the villagers (Baung Village and Jahitan Village), labor union and gender committee, it is known that they had a good understanding of communication and consultation procedures.

In addition, UoC also put the board of communication procedure in any strategic spots for example in each estate office.

### 1.1.5

UoC showed the current list of stakeholders which informed the internal and external stakeholders. The stakeholders include the government agencies, polices, heads of the community, smallholder cooperation, policies, health facilities, educational facilities, NGO, local suppliers, contractors, internal stakeholder, journalists, and daily needs seller. In the current list of stakeholders, it was also explained the names, relation, addresses, categories and contact person numbers.

During the assessment, auditor has verified the list of stakeholder by calling the contact person randomly to ensure the validity of its contact person put in the list of stakeholder.

Status: Comply

## 1.2

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

### 1.2.1

Unit of certification had a policy concerning on code of integrity and ethical behavior in all operational activities and transactions. This policy stated in the Directors Decree No. SKD/CEO/VII/2022/002 validated by the Director in 2022. It's explained that, the TAP group committed to apply fair business practices, prohibit all forms of corruption, bribery and fraud in the use of funds and resources, and provide business information in accordance with applicable law and acceptable industry practices.

UoC's code of ethics had been socialized to the workers, smallholder workers and contractors, for example:

- Estate 3 had carried out socialization on 15 September 2022 attended by 24 workers and contractor workers.
- Estate 2 had carried out socialization on 13 September 2022 attended by all workers.

This policy has been implemented by the company in all business operations and transactions including recruitment and employment contracts. Code of ethics (anti-corruption and anti-bribery) are stated in every work agreement letter of third parties (contractors) and workers. Based on the interview with workers and contractor workers (CV Putra Blambangan), it's known that they had a good understanding towards the code of ethics policy.

### 1.2.2

A comprehensive system for monitoring compliance and implementation of ethical business policies and practices was carried out through the internal audit. UoC also showed the mechanism in implementing UoC's policy as stated on the agreement that the parties have to be fulfil the existing regulation such as do not employ any child labor, prohibit any corruptions and frauds, and disallowance of forced labor.

The procedure in implementing and complying all the existing laws and regulations stated in the Internal Memo No. MI/SUST/II/2019/004 validated on 1 January 2019. This document stated that each department should arranged the law register in accordance with its related law. This matter specifically explained in indicator 2.1.2.

Based on the interviews with workers in mill and estate, they worked in the company wasn't through any agent or labor supplier and there were no any fees during recruitment.



<p>UoC also showed some SOPs related to monitor the compliance and implementation of ethical business practices, here as follows:</p> <ul style="list-style-type: none"> <li>Internal Memo No. MI/HC/III/2022/003 validated on 11 March 2022 and company regulation period of 2022 to 2024 which stated that there was no cost in recruitment process. The company had guaranteed the cost of recruitment if there were any migrant worker.</li> <li>Internal Memo No. MI/HC/XI/2021/028 validated on 1 November 2021 concerning on Worker's Promotion, Demotion, and Mutation.</li> <li>SOP of handling worker's grievance in site (No. SOP/SUPP/XI/2016/009) validated on 25 May 2022 by the CEO Group. This procedure stated that the company guaranteed the freedom of speech by keeping the identity of the employee confidentially.</li> </ul> <p>Based on the management review and internal audit document, there were no violation against the UoC's ethical codes.</p>		
Status: Comply		
<b>PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS</b>		
<b>2.1</b>		
<b>There is compliance with all applicable local, national and ratified international laws and regulations.</b>		
<b>2.1.1</b>		
<p>The company has list of regulations of 2022 that includes local regulations and national regulation updated annually. List of laws/regulations listed has covers several aspects such as land permit and legality, manpower, occupational health and safety, best management practices and environment. Some examples of regulations compliance that have been done such as:</p> <p><b>Land legality</b></p> <p>The company shown evidences over its compliance toward the applicable regulation related to the aspects of land legality such as:</p> <ul style="list-style-type: none"> <li>Release of convertible production forest area covering 19,647.98 ha according to <i>Kepmen Kehutanan</i> Number SK.507 / Menhut-II / 2006 dated November 22<sup>nd</sup>, 2006 located in Seruyan Hilir Subdistrict, Seruyan District, Kalimantan Tengah Province on behalf PT GBSM for palm oil plantation cultivation in accordance with laws and regulations.</li> <li>Plantation business permit No. 525/460 / Ek / XII / 2006 dated December 4<sup>th</sup>, 2006 covering an area of 19,647.98 ha located in Baung, Empa &amp; Jahitan Village, Seruyan Hilir District, Seruyan District, Kalimantan Tengah Province.</li> </ul> <p><b>Environmental Aspects:</b></p> <ul style="list-style-type: none"> <li>Decision of the Head of the Investment and One-Stop Services Office of Seruyan Regency Number 503-F.1/01.002/SK.DPMPTSP/III/2019 concerning environmental permits for the construction of plantations and palm oil processing factories and other supporting facilities in Baung Village, Stitch Village and Muara Dua Village, Seruyan Hilir District, Seruyan Regency, Central Kalimantan Province by PT Gawi Bahandep Sawit Mekar.</li> <li>Approval of fulfilling commitments in the context of issuing commercial/operational licenses for temporary storage of hazardous and toxic waste materials to PT Gawi Bahandep Sawit Mekar with Number 503/999/DPMPTSP/XII/2019 on 23 December 2019 from the Investment and One-Integrated Services Agency Doors with a validity period of 5 years.</li> <li>Related to OFI in the previous assessment, namely those related to Land Application permits, Company Technical Approval for the utilization of liquid waste by Application to Land Number 660/06/DLH.II/2021 on July 30 2021 from the Seruyan District Environmental Office. The results of interviews with the Seruyan Regency Environmental Service and company representatives found that currently there is no longer any permit extension, as long as there is no change, the old permit will remain valid.</li> <li>Decree of the Head of the Investment and One-Stop Services Office of Central Kalimantan Province Number 570/06/DPUPR-IPAP/I/DPMPTSP-2018 concerning permits to exploit surface water on the Seruyan River in the Village of Stitch, Seruyan Hilir District, Seruyan Regency, Central Kalimantan Province by PT Gawi Bahandep Sawit Mekar on February 8 2018 with a validity period of 5 years.</li> </ul> <p><b>Manpower Aspect:</b></p> <ul style="list-style-type: none"> <li>UoC has implemented a minimum wage and the fulfillment of overtime wages</li> <li>UoC already has and implements a pay scale structure</li> <li>There was no illegal labor, underage labor and forced labor systems.</li> <li>UoC has reported contract worker in PT GBSM on 25 October 2022.</li> </ul> <p><b>OHS Aspect</b></p> <p><b>Boiler Operator</b></p>		

- Permenaker No. 01 of 1988, in Appendix 1 it is explained that for a steam boiler capacity >20 T/h - <40 T/h requires 1 class I operator and 1 class II operator for each shift.
- The results of field observations at GBSM Mill show that the company has a boiler with a capacity of 40 tons/hour. It is known that the Boiler Operator works 2 shifts.
- Based on document review and interviews, it is known that there are:
  - 1 operator with the initial S who already has a K3 Class 1 Boiler Operator License.
  - 2 Operators with the initials AJ and AT who have passed and are competent to take the Class 1 and 2 Boiler Operator certification, and have been shown a certificate from PJK3 TPM with number 1439/SK/VIII/2022 dated August 24, 2022 that the Certificate and License are current currently being processed at the Ministry of Manpower, so currently there is still a shortage of 1 K3 class 2 license operator.

### Power House Operator

- Permenaker No. 38 of 2016 in Articles 110, 111 and Table E it is explained that for prime movers with power > 214.47 HP must have one person each for class I and class II power and production aircraft operators.
- The results of field observations of GBSM show that the company has a turbine engine with a capacity of 1,800 KW/2,413 HP. It is known that the Engine Room Operator works 3 shifts.
- The results of a study on the list of OHS license operators, it is known that there is 1 engine room operator with the initials JW who already has an OHS license of Power and Production Aircraft with a validity period of up to 30 May 2023 so there is still a shortage of 2 licensed operators for the next shift.

### Heavy Equipment Operator

- Permenaker No. 8 of 2020 on operator qualifications it states "heavy equipment such as excavators, loaders, tractors, graders. Dozers, roller/vibrator compactors have K3 license operators.
- Based on the review of the master list document on the legality of operators holding OHS licenses, it was found that there were 17 operators who already had OHS heavy equipment Licenses. It has also shown a statement letter from PJK3TPM with number 1445/SK/VIII/2022 dated 24 August 2022 that Certificates and Licenses are currently being processed at the Ministry of Manpower as many as 5 pieces.
- The results of a review of Heavy Equipment documents (Tractors, Graders, Excavators, vibrators, and compactors), found that there were 77 aircraft-type heavy equipment in the company. So that currently there is still a shortage of OHS license operators as many as 55 operators.
- The company shows plans to submit K3 Operator certification and licenses for 41 people during the 2021 – 2022 period.

### GBSM OHS Committee

- Regulation of the Minister of Manpower number 4 of 1987 concerning OHS Committee and the procedure for appointing OHS Expert states that the secretary of OHS Committee is the OHS Expert of the company concerned and OHS Committee is determined by the Minister or an appointed official.
- The company showed the Decree of the Central Kalimantan Province Manpower and Transmigration Office number 566/110/PK.12/II/Nakertrans dated 09 February 2022 concerning the Decree to Approval of GBSM OHS Committee with the secretary of OHS Committee with the initials OAT, but the results of interviews with the Manager of GBSM, it is known that OAT has resigned in mid-July 2022. Currently the OHS Committee secretary is carried out by workers with the initials GY, who do not yet have a General OHS Expert license and do not yet have a letter of appointment authorization from the Minister/official appointed as an OHS Expert at GBSM, and have not yet received a Structure Decree The latest OHS Committee from the related service.

Based on this evidence, it is known that the company has not been able to show sufficient evidence:

1. Boiler Operators in accordance with *Permenaker* No. 01 of 1988.
2. Power House Operators in accordance with *Permenaker* No. 38 of 2016.
3. Heavy equipment Operators in accordance with *Permenaker* No. 8 of 2020.
4. GBSM's General OHS Expert who has a Letter of Authority and Appointment as the company's General OHS Expert in accordance with Minister of Manpower Regulation number 4 of 1987.

This has become **Non-conformity No. 2022.01 with major category.**

### 2.1.2

Procedure of legal requirement which presented in document MI/SUST/II/2019/004 validated on 1 January 2019 mentioned that each division has responsibility to arrange and monitor the related laws and regulation, for example: Human Resource Division had the responsibility in arranging Manpower regulations in law register. The procedure mentioned that in order to monitor and update of laws and regulations, the legal division officer required to actively check and make coordination with Government Agencies or Institutions. Internal audit of regulations compliance is conducted annually. Regarding the evidence of evaluation of legal compliance from contractors collaborating with the company, is explained in more detail in indicator 2.2.2.

The implementation of this procedure showed by the list of a law register document updated on 31 October 2022. This document informed all relevant regulations that must be fulfilled in UoC's operational activities, including the third parties (contractors). One of the updated regulation mentioned was Law No. 35 of 2021 regarding the contract worker, outsourcing, working time, and termination. The law register is divided into several aspects, namely: OHS, environmental, manpower, and best management practices. In addition, the certification unit has carried out an evaluation of each contractor annually as the collaborative agreement period. There are several important indicators in the annual evaluation including work quality, compliance with laws, implementation of OHS, etc.

### 2.1.3

Procedure of legal boundary stakes monitoring and maintenance is presented in document Standing Instruction Managing Director No. 027/MI-DIR/XII/2012 dated 12 December 2012. Procedure mentioned that maintenance was carried out by foreman with supervision of Assistant Manager. Monitoring the boundaries of the HGU is done every 3 months.

The company shows the HGU stake monitoring document which is carried out every 3 months. The last HGU stake monitoring was carried out for example in September 2022 at Estate 1, Estate 2 and Estate 3. The report on the inspection and maintenance of the boundary stakes has provided complete information regarding the number of stakes, the state of the stakes, the location of the stakes, the coordinates of the stakes and corrective actions as well as the target time for repairs if there are damaged or missing stakes. In the monitoring report, it is known that all HGU stakes are available.

Based on field observations to several samples of HGU stakes determined by the auditors, namely Estate 1 (Stakes No. 48 and 49), Estate 2 (Stakes No. 149, 151 and 153) and Estate 3 (Stakes No. 87, 92, 93 and 121), it is concluded that all HGU stakes are in place according to their coordinates and are in good condition. Land boundaries with outsiders are clear, such as a large boundary road and trench that borders the HGU area. There is no indication of land use outside the HGU.

2.1.1	Status: Non-conformity No. 2022.01 with major category
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### 2.2

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

#### 2.2.1

In monitoring the existence of contractors for plantation and mill activities, UoC had well-documented the list of contractors, type of business, contact persons, work agreements, and ensuring other matters related to compliance with laws and regulations in Indonesia. The contractors collaborate in the activities of operational vehicles rental such as CPO and Kernel transport, security outsourcing, and hazardous waste transport, here as follows:

- Estate cooperating with 6 contractors, as follows: CV Ahlia Zahra collaborating in EFB Transport, *Koperasi Masyarakat Sekitar Hutan* collaborating in EFB Transport, *Koperasi Tunas Harapan* collaborating in EFB transport, CV Elisa Eriska collaborating in building construction, which has 6 workers, CV Putra Blambangan collaborating in building construction which has 10 workers, and PT Semesta Langgeng Sentosa collaborating in hazardous waste transport.
- Mill cooperating with 12 contractors, for example: PT Jaya Harapan Nusa Sejahtera collaborating in CPO and PK transport, CV Ladang Mandiri collaborating in CPO transport, and CV Bumi Makmur collaborating in PK transport.

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

- Work Agreement of PT Jaya Harapan Nusa Sejahtera (No. 004/GSM/P-TRA-HO/II/22) for collaborating in CPO transporting which is valid until 31 December 2022.
- Work Agreement of CV Alia Zahra (No. 12/GBSM3/TM/SPK/VIII/2022) for collaborating in Composting Transport dated on 1 August 2022 which is valid for 8 months (1 August 2022 to 31 March 2023).



The explanation above can be concluded that the UoC has managed and documented the list of contractors along with its supporting documents.

### 2.2.2

UoC showed that there were several separate clauses on the work agreement between the company and the contractor related to fulfilling legal obligations in Indonesia. Some of these obligations are related to the registration of workers' health and social security insurance, the provision of minimum wages, the obligation to use PPE, other permits such as tax payment, etc. To ensure the compliance with these clauses, UoC always requests the requirements for the completeness before the contractor does work.

In addition, UoC has carried out an evaluation of each contractor to see the performance of the contractors and the compliance of the contractors to the existing regulation, for example the evaluation of CV Alia Zahra on 31 July 2022. There were several important indicators in the evaluation including the workers' age must be above 18 years old, compliance with regulations and laws (BPJS, provision of minimum wages, implementation of OHS, and work equipment), work quality, punctuality, grievance handling, and the comprehension regarding anti bribery policy.

Based on the interviews with contractor, contractor workers (CV Putra Blambangan), and documents verification, it's revealed that workers had received wages and were registered in the BPJS program. For example:

- Proof of payment of wages period of September 2022 for CV Putra Blambangan worker on behalf of AS (initial) who received wages above the minimum wage.
- BPJS *Ketenagakerjaan* (Social Security Insurance) payments for CV Elisa Eriska contractor workers have been completely fulfilled and the last proof of payment is on 29 August 2022 for period of August 2022.

### 2.2.3

UoC showed that on each work agreement between the unit of certification and the contractor, there were clauses related to fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the contractors. Some of these obligations are related to UoC's commitment against forced labour, underage worker, and not to employ workers from human trafficking stated in article number 4 in the agreement.

To ensure compliance with these clauses, the company always requests the requirements for the completeness before the contractor does work.

Based on the document review and the field observation, it 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. Based on the interviews with contractor, contractor workers (CV Putra Blambangan), and documents verification, it revealed that they had a good understanding related to the minimum age of worker, the prohibition of forced labor and the human trafficking.

Status: Comply

## 2.3

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

### 2.3.1

Based on the results of document verification, it is known that the company has received FFB directly from several sources, namely:

- Estate 1 PT Gawi Bahandep Sawit Mekar → Certified RSPO
- Estate 2 PT Gawi Bahandep Sawit Mekar → Certified RSPO
- Estate 3 PT Gawi Bahandep Sawit Mekar → Certified RSPO
- *Koperasi Usaha Mandiri* (Plasma PT GBSM) → Non Certified RSPO.
- PT Mega Ika Khansa (Group TAP) → Non Certified RSPO
- PT Salonok Ladang Mas → Non Certified RSPO

Companies can show geolocation information from FFB suppliers directly, namely:

- *Koperasi Usaha Mandiri* with coordinates Latitude: 2.55'12.444"S and Longitude 112.18'20.302"E with Legality in the form of IUP-B with Number 500/587/EK/VI/2012.
- PT Mega Ika Khansa with coordinates Latitude: 2.50'27.487"S and Longitude 112.19'14.231"E with Legality in the form of IUP dengan Nomor 188.45/297/2020.

- PT Salonok Ladang Mas with coordinates Latitude: 2.45°08.500"S and Longitude 112.26°51.400"E with Legality in the form of HGU dengan Nomor 15.08.05.01.2.00001.

### 2.3.2

Based on the results of document verification, it is known that the company has received FFB indirectly from several sources, namely:

- Supplier of Marjan with a total of 7 farmers
- Supplier Deny Hendaryono (Independent Farmers)
- Supplier of Abdul Jafar with a total of 15 farmers
- Supplier Rudiyanto with a total of 4 Farmers
- Supplier of CV Kaisa Sinar Mutiara with a total of 10 farmers
- Supplier of Hasan Efendy (Independent Farmers)
- Supplier of Tamaula Ginting with a total of 10 farmers
- Supplier Ardiyan with 2 farmers
- Suppliers Sebabi with 12 Farmers

Companies can show geolocation information from FFB suppliers directly, namely:

- Supplier Marjan with coordinates Latitude: 3.00°22.558"S and Longitude 112.30°22.936"E with Legality in the form of SKT with number Nomor 593.21/317/SP-JHT/2011.
- Supplier Deny Hendaryono with coordinates Latitude: 2.99°88.420"S and Longitude 112.30°76.780"E with Legality in the form of SKT with number 593.21/031/SPT-JHT/2013.
- Supplier Abdul Jafar with coordinates Latitude: 2.40°06.711"S and Longitude 112.45°57.816"E with Legality in the form of SHM with number 15.11.08.06.1.01096.
- Supplier Ruditanto with coordinates Latitude: 2.39°60.884"S and Longitude 112.45°30.612"E with Legality in the form of SKT with number 593/064/SP-JHT/2012.
- Supplier CV Kaisa Sinar Mutiara with coordinates Latitude: 2.40°00.801"S and Longitude 112.45°48.766"E with Legality in the form of SHM with number 15.05.13.01.1.01174.
- Supplier Hasan Efendy with coordinates Latitude: 2.36°90.070"S and Longitude 112.90°02.330"E with Legality in the form of SKT with number 592/SPKT/PEM-SBL-II/XII/2009.
- Supplier Tamaula Ginting with coordinates Latitude: 2.49°11.760"S and Longitude 112.20°25.998"E with Legality in the form of SKT with number 403/SPKT/PEM-SBL-II/XII/2009.
- Supplier Ardiyan with coordinates Latitude: 3.27°68.350"S and Longitude 112.55°72.270"E with Legality in the form of SHM with number 15.11.06.05.1.01375.
- Supplier Sebabi with coordinates Latitude: 2.24°04.560"S and Longitude 112.27°17.688"E with Legality in the form of SKT with number 593.2/425/Pem.

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

There is a management plan that has a minimum period of three years, which is documented in the PT GBSM Long Term Plan Report document for the period 2020 – 2030, which includes plans regarding FFB production projections, CPO production projections, PK production projections, OER projections, KER projections, FFB supply source plan including plasma in it, CPO - PK price projection, cost projection, and revenue projection. For example, for 2023, projected FFB production is 383,400 tons, projected CPO production is 92,326 tons, projected PK production is 17,642 tons, projected OER is 24% and projected KER is 5%.

#### 3.1.2

The results of the document review and interviews with management representatives revealed that there is no replanting plan yet. The oldest planting year is 2006, which means that the oldest palm is still 16 years old. The average productivity month to date is 22 tons/ha. From the results of field observations in all assessment locations, it was found that there was no replanting.

**3.1.3**

The CH has conducted regular management reviews. It has shown the RSPO Internal Audit Report which was carried out 18-19 October 2022 as one of the management reviews conducted by the company. There are 5 discrepancies with closed status. The PICA (Problem Identification Corrective Action) document has also been shown in October 2022 the results of the assessment on the plantation and Mill, with 4 findings and the final completion target is 31 December 2022. For the agronomic aspect, the Review Management has also been shown which will be carried out in October 2022 by the GM, Manager, and operational staff.

To review the company's financial condition, an independent audit of financial statements has been carried out by a public accounting firm. It has shown report number 00921/2.1032/AU.1/01/0704-2/1/IV/2022 for the financial period as of 31 December 2021 with an opinion presented fairly and in accordance with financial accounting standards in Indonesia.

<b>Status: Comply</b>
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**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 management unit has developed and implemented an action plan for continuous improvement and it is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification, such as:

- The company no longer uses pesticides with the active ingredient paraquat.
- The company has implemented biological pest control in this case by using host plants and owls to reduce the use of pesticides, especially insecticides and rodenticides.
- Management and monitoring of fires in company border areas that benefit the community.
- The use of renewable fuels and the use of fertilizers and pesticides are in accordance with the recommendations to reduce the use of fossil fuels.
- Waste management and monitoring through WWTP management, effluent quality testing and reporting to the Seruyan District Environmental Office.
- Management and monitoring of air quality through road maintenance, air quality testing and reporting to the Seruyan District Environmental Office.
- Management and monitoring of groundwater through Testing the quality of groundwater and reporting it to the Environment of Seruyan District.
- Hazardous waste management through hazardous and toxic waste storage and hazardous and toxic waste management and monitoring.
- Greenhouse Gas (GHG) Management. Implementing a zero burning policy, utilizing EFB, shells and fiber as renewable energy, regular engine maintenance, and regular emission quality tests.

**Periodic internal audit and operational review**

It has shown the RSPO Internal Audit Report which was carried out 18-19 October 2022 as one of the management reviews conducted by the company. There are 5 discrepancies with closed status. The PICA (Problem Identification Corrective Action) document has also been shown in October 2022 the results of the assessment on the plantation and Mill, with 4 findings and the final completion target is 31 December 2022. For the agronomic aspect, the Review Management has also been shown which will be carried out in October 2022 by the GM, Manager, and operational staff.

**3.2.2**

The company already has an annual report document using the RSPO metric template version 2.1 format which was provided to the auditor team at the time of the assessment. The summary in the report, for example, is as follows:

- Name of RSPO Member: Triputra Agro Persada
- RSPO Membership Number: 1-0038-07-000-00
- Name of Certified Audit: Gawi Bahandep Sawit Mekar
- Name of Certification Body: PT Mutu Agung Lestari
- RSPO Palm Trace ID Number: RSPO\_PO1000001618
- Number of Mill: 1
- Number of Certified Estate: 3
- HCV Area: 470.07 Ha.

	Status: Comply	
<b>3.3</b> <b>Operating procedures are appropriately documented, consistently implemented and monitored.</b>		
<b>3.3.1</b> <p>Based on document review and interviews with management representatives, it is known that there has been no change in operational procedures in the plantation or in the mill. It is known that there are ±11 procedures that regulate all agronomic activities such as land clearing, nursery, planting, weeding management, field conservation, integrated pest management, harvesting and transportation, upkeep in immature and mature, manuring, and road and bridge maintenance.</p> <p>Likewise at POM there are also no changes in procedures. There are ±16 procedures that regulate all operations at POM from receiving FFB, sorting, processing, managing WWTP and the environment, and dispatch. Regarding OHS aspects, there are procedures including emergency response, HIRAC, PPE, LOTO, and MSDS. Based on field observation during the assessment carried out at the estate and POM, it was found that workers had carried out their duties according to company procedures.</p> <p><b>3.3.2, 3.3.3</b>  CH has a system that ensures the implementation of procedures in all work units of the company. An Audit Charter has been shown which regulates the duties and responsibilities of an internal audit, such as testing and evaluating the implementation of internal controls, and inspection of operational areas. Related to the evaluation of the contractor's work the company has also carried out, which has been discussed in detail in 2.2.2.</p> <p>Some of the recorded documents related to the supervision of the implementation of procedures, including:</p> <ul style="list-style-type: none"> <li>• PICA (Problem Identification Corrective Action) OHS inspection and housekeeping in June 2022 in residential areas. There are 5 discrepancies that have been declared fulfilled.</li> <li>• RSPO internal audit report carried out on 18-19 October 2022, with the results of 5 discrepancies that have been declared closed.</li> </ul>		
	Status: Comply	
<b>3.4</b> <b>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.</b>		
<b>3.4.1</b> <p>Based on document verification, it is known that there were no new entrants made by the company. The company has conducted independent and participatory environmental and social impact assessments involving stakeholders listed in several documents, namely:</p> <p><b>Environmental Aspect</b>  The company already has environmental impact identification documents listed in the Environmental Impact Analysis document for the construction of a Palm Oil Plantation and Processing Factory with an area of 19,594.22 Ha and a Mill Capacity of 90 Tons of FFB/Hour. In 2018 the company carried out an AMDAL addendum for development activities for the PT Gawi Bahandep Sawit Mekar Palm Oil Plantation and Processing Factory and has obtained an environmental permit in accordance with the Decree of the Head of the Investment and One-Stop Services Office of Seruyan Regency Number 503-F.1/01.002/SK. DPMPSTP/III/2019 concerning environmental permits for development activities for plantations and palm oil processing factories and other supporting facilities in Baung Village, Stitch Village and Muara Dua Village, Seruyan Hilir District, Seruyan Regency, Central Kalimantan Province by PT Gawi Bahandep Sawit Mekar. EIA scopes are pre-construction stage, construction, operational stage and post operational stage.</p> <p>Based on document verification, it is known that the environmental impact assessment has been carried out independently and participatively by involving affected stakeholders such as the surrounding village community. The results of field observations during the audit activities revealed that all of the company's operational activities had been included in the company's environmental documents.</p> <p><b>Social Aspect</b>  The company has conducted a social impact assessment conducted by LINKS Consultants in 2012. Data collection activities were carried out on 18-27 May 2012. The social impact assessment was carried out in an independent and participatory manner involving</p>		

employees, local government, NGOs, media, plasma cooperatives and prospective Plasma Farmers and the surrounding village community such as Baung Village, Desa Jahitan and Muara Dua Village. Data collection methods were carried out by field observations, FGDs, and structured interviews.

Based on document verification, it is known that the social impact assessment has been carried out independently and participatively by involving affected stakeholders, including an impact study of the plasma smallholder scheme.

Based on interviews with the Jahitan village, it is known that the social impacts of the company's existence such as partnerships with business actors to provide business opportunities to the community, CSR, employment opportunities, etc. These social impacts have also been identified in the SIA Documents and Environmental Documents owned.

Based on document verification, it is known that the scope of the social impact assessment has covered all villages, farmers, and has involved internal workers.

### 3.4.2

The company already has an environmental and social management and monitoring plan, namely:

#### Environmental Aspect

The environmental management and monitoring plan is in accordance with the environmental documents that are owned, such as:

- Air Quality (dust & gas)
- Noise.
- Soil Physical Properties
- Chemical Properties and Soil Fertility
- Soil Erosion
- River water discharge
- River Water Quality
- Water biota
- Public unrest.
- Community Attitudes and Perceptions
- Disease prevalence and incidence

The scope of the AMDAL consists of the Pre-construction Stage, the Construction Stage, the Operational Stage and the Post-Operation Stage. This includes those related to roads, factories or other infrastructure, in addition to constructing roads, bridges, culverts and drainage. The assessment was carried out in a participatory manner in the villages of Baung, Jahitan and Muara Dua, Seruyan Hilir District.

#### Social Aspect

The company has a social management plan for the 2022 period which was set on January 19, 2022 based on the recommendations from the social impact assessment conducted in 2021 and the results of the social impact management review for the 2019-2021 period. The social impact assessment and review has been carried out in a participatory manner by involving the surrounding community and employees. The social impact management plan for the 2022 period includes:

- Village road construction
- Factory waste pollution
- Community land claims
- Differences of opinion regarding the plasma land compensation process
- Employee housing facilities
- Application of occupational health and safety standards
- Livelihood

In 2022 the company has developed a social management and monitoring plan as outlined in the Management Plan SIA document based on the findings of the social impact assessment at the certification unit, involvement in the process of preparing the document is known to have involved external and internal stakeholders such as Village Government, Community Leaders, Worker Unions. Based on the results of the document review, companies are encouraged to carry out a more in-depth mapping of key stakeholders.

for example for external stakeholders by paying attention to women, migrants, local residents, youth leaders, contractors and for internal stakeholders by paying attention to the representation of wider workers such as local workers, migrants, women, new workers including contract workers. (OFI)

### 3.4.3

The company has implemented an environmental and social management and monitoring plan, namely:

#### Environmental Aspect

The company has implemented an environmental management and monitoring plan for the first semester of 2022. The implementation of the environmental management and monitoring plan is in accordance with the environmental documents it has. The results of document verification for the implementation of the environmental management and monitoring plan for semester 1 of 2022 are in accordance with the directives from the environmental documents in their possession. In general, the results of environmental management and monitoring are in accordance with the provisions. The company has also conducted evaluations such as trend evaluation, critical level evaluation, and compliance evaluation. The results of environmental implementation and monitoring show that all environmental parameters managed and monitored comply with the provisions. Based on the results of interviews with the surrounding community, information was also obtained that there was no environmental pollution by the company. In addition, the results of interviews with the Seruyan Regency Environmental Service also explained that the company had carried out environmental management and monitoring and reported the results of the implementation of environmental management and monitoring to the Environmental Office.

#### Social Aspect

The company has implemented an SIA management and monitoring plan for the 2021 period. The plans that have been implemented are in accordance with the SIA management and monitoring plan they have. Some examples of the implementation of the SIA management and monitoring plan are as follows:

- Development of Plasma Plantations through independent business cooperatives. The plasma plantation development process is still being carried out in stages and the company always conveys to the community every progress, either personally or through forums.
- Access and land use. The company continues to give freedom to the community to access their land which is enclave and borders on the company's HGU.
- Develop CSR programs that help the community's independent business grow, such as providing agronomic training to increase better production for independent farmers, providing assistance to fish pens and chicken farms.

The company has also conducted a review of the SIA management and monitoring plan which was carried out together with the surrounding community and workers as evidenced by showing the minutes of the review of the SIA management and monitoring plan along with the attendance list of Questionnaires conducted through FGDs. The review was carried out for the period December 28 2021 to see the suitability of the plans with actual conditions.

<b>Status: Comply</b>
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### 3.5

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

#### 3.5.1

UoC had procedures related to recruitment, appraisal, promotion, remuneration, and termination of employment which are generally described in the Company Regulation period of 2022 to 2024 written in *Bahasa*. This company regulation has been validated by the head of manpower agency of Seruyan District with Decree 560/597/Disnakertrans/IX/2022 on 7 September 2022.

Based on the document verification, the company regulation generally described these procedures as follows:

- Recruitment of workers is based on the company's needs.
- The minimum age of workers is 18 years old.
- The workers who have been accepted will through three months of probation.
- Promotion of workers is based on needs, period of work, expertise, and assessment of workers/
- The company is authorized to carry out the placement, transfer, and promotion of workers by applicable regulations.

In addition, the procedures of employee recruitment, appraisal, promotion, and remuneration are explained specifically in several procedures. These procedures have been documented and socialized to all workers and their representatives, here as follows:

- Internal Memo No. MI/HC/III/2022/003 validated on 11 March 2022 regarding the recruitment procedure.



- Internal Memo No. MI/HC/XI/2021/028 validated on 1 November 2021 regarding worker's promotion, demotion, and mutation.

Based on the interviews with workers (harvesters, pesticide sprayers, and mill operators), workers had a sufficient understanding of the procedures related to recruitment, promotion, and termination of employment. The types of workers exist in the company are contract workers and permanent workers. Workers explained that the recruitment process carried out by the company was in accordance with the terms according to ability, promotion is based on an assessment of the performance of each employee each year, and termination of employment can occur if the worker has committed a serious violation and other causes of termination as in existing government regulation. All labor procedures has been in accordance with the applicable regulation.

### 3.5.2

Unit of Certification documented some labor procedures that have been carried out properly, such as recruitment, promotion, performance appraisal, and termination. The following are some sample labor procedures that have been implemented and are well documented by certification unit, including:

- Recruitment document in accordance with the recruitment requirements such as employment request form, application letter, statement of police report, identity card (KTP), family identity card (KK), the result of written test, the result of interview test, and contract worker work agreement letter. For example, a worker on behalf of AT (initial) who started working as a mechanical worker in mill on 8 June 2022 and valid until 8 December 2022.
- Promotion documents as in personnel change notice document. For example, a worker on behalf of JD (initial) who had a promotion based on worker's appraisal, from contract worker to permanent worker in harvesting on 1 August 2022.
- Termination document such as the management decree of employment's termination on behalf of JM (initial) due to lengthy sickness. UoC also showed other supporting documents such as the management decree of employment's termination, calculation of termination payments, and the proof of its payment in accordance with the applicable laws.

Based on the interviews with the Manpower Agency of Seruyan District, the company had been applied the existing labor procedures in accordance with the regulations. During 2021 to 2022, there were no issues related to manpower.

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

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

### 3.6.1

The CH has conducted risk assessments and identification of OHS issues for all estate and mill operations. This has been regulated by the Technical Guidelines for Hazard Identification, Environmental Impact Analysis and Safety, Occupational Health and Environment (K3L) Risk Assessment (No. Document PT/SUPP/III/2016/003, 24 March 2016, Rev.00). The SOP describes hazard identification, environmental impact analysis and all activities/activities/work, work processes, work methods/methods, work places/locations, work equipment and materials/materials using the Hazard Identification Form, Environmental Impact Analysis and OHSE Risk Assessment and considering things such as routine activities, normal conditions, abnormal, and emergencies. Preparation of Hazard Identification, Environmental Impact Analysis and OHSE Risk Assessment made before work is carried out in all sections/departments and must be reviewed/reviewed (evaluated and corrected) at least once a year. Shown is the latest update for farm HIRAC as of June 1, 2022 and the factory update as of January 1, 2022.

### 3.6.2

The CH has carried out regular monitoring, including the following:

- Regular OHS Committee meetings. As an example, shown September 3, 2022, with 9 participants. Discussions have been made regarding the new signboard, drainage at the clarification station, first aid training and certificates, and repair of street lights.
- Testing OHS aspects of the tools and machines owned, such as noise and vibration tests at the factory. For example, the results of the last noise test on April 20, 2022 for 8 points in the Factory area using a sound level meter, the results were still below the threshold value. Control measures have been recommended including warnings, and the use of ear plugs and earmuffs. According to the results of field observations, this has been implemented in the field.
- Reports on the results of testing for arm and hand vibration tests using a human vibrator meter have also been shown to the compactor operator, with results below the threshold value.
- The CH has ensured that workers in the area have received training, such as a Power House Operator with the initials JW having a K3 Operator license that is valid until 30 May 2023 and an Excavator Operator with the initials FG with a license validity period of up to 25 June 2023. Based on field observation in the power house/engine room area it is known that workers have used the appropriate PPE such as earmuffs, safety helmets and safety shoes.

Status: Comply

**3.7**
**All staff, workers, Scheme Smallholders, out growers, and contract workers are appropriately trained.**
**3.7.1**

Unit of certification had training identification and program for 2022 in order to improve the competence and expertise of all workers including contractors. The company had identified the needs of competence standard and the proposed training for each worker including contractor worker, for example:

- Training of fire-fighting and first aid simulation for emergency team.
- Training of children care for daycare officer.
- Training of MSDS for warehouse officers.
- Training of pesticide application for pesticide application workers in estate

**3.7.2**

UoC also showed that they had properly documented every training activity and socialization that had been carried out to all workers, contractors, smallholders, and related stakeholders. The following is an example of training/socialization documentation that had been carried out, for example:

- Training of loading ramp and kernel station procedure in Mill on 5 September 2022 which was attended by all workers in loading ramp and kernel station.
- Training of security procedure on 30 September 2022 which was attended by 8 security workers in Mill.

Based on field observations and interviews with workers (harvesters, upkeep workers, warehouse officers, and mill operators) also contractor workers, it is known that the company provides some training programs due to upgrade the worker's expertise and competence. All workers also showed their understanding of duties and responsibilities for each job quite well.

**3.7.3**

The unit of certification showed socialization about the supply chain to employees which was last conduct on 31 October 2022. The minutes explained the procedures for managing certified and non-certified products including the responsibilities for each of the personnel who handle products.

The results of interviews with Head of Administration, weighbridge operator in POM and FFB administration in Estate showed that workers have already known the duties and responsibilities of each in the implementation of SCCS in accordance with the procedure and have been able to explain well about the management of certified and uncertified products, especially regarding the origin of the FFB source.

Status: Comply

**3.8**
**Supply Chain Requirements for Mills**
**3.8.1 and 3.8.2**

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

**3.8.3**

Estimated certified product recorded in the last assessment report. The estimates of certified production for the next license period describe at ASA-1.3 report (basic info 1.8.3), in reasonable amount taking into account the last year's production. The data are shown in the following table:

Products	Last Year Projected Certified Volume (MT)	Actual (October 2021 - September 2022)
FFB Certified (MT)	323,000	250,014.59



CSPO (MT)	74,750	56,014.99
CSPK (MT)	16,250	12,136.28

### 3.8.4

The Mill has registered as RSPO member under PT Triputra Agro Persada tbk (No. 1-0038-07-000-00) and also has been registered in IT platform palm trace RSPO <https://palmtrace.rspo.org/web/rspo/member-directory> which information as follows:

- Member Name: PT Gawi Bahandep Sawit Mekar
- License ID: CB95820
- Core Product: Palm Oil
- Member ID: RSPO\_PO1000001618
- Type of Business: Oil Mill
- Supply chain model: Mass Balance

### 3.8.5

Unit of certification has RSPO Supply Chain SOP with document number SOP/SUPP/III/2022/001 effective date 22 February 2022. The scope of activities of the relevant elements and the production and distribution chain in question are Palm Oil Mill. Applied to the Supply Chain Model Mass Balance (MB). With the aim to explain in general about the requirements regarding traceability and Mass Balance (MB) balance. This procedure informs the duties and responsibilities of the Sustainability Department, Marketing Department, mill traceability, FFB traceability, use of palm trace, handling of non-conformities or complaints including training that includes training plans, target participants, training conducted once a year and training materials.

Based on interviews in GBSM POM note that the weighbridge operators understand the supply chain management system. It also known that training and refreshment (awareness) of supply chain management system were carried out annually.

### 3.8.6

The procedure for internal audit for SCCS mentioned in the procedure of RSPO Supply Chain Model of Mass Balance (No. SOP/SUPP/III/2022/001). Based on that procedure internal audit carry out minimum one times a year. Based on document review, the company show the record evidence regarding internal audit of RSPO SCCS that conducted on 20 December 2021. Based on result of internal audit, there is 2 non conformity SSCS indicators and has been corrected and complied with RSPO Supply Chain requirements for mills and the RSPO Rules on Market Communications and Claims.

Management Review of RSPO SCCS implementation conducted on 31 January 2022. The management review discussion has covered the input from internal audit result, correction and corrective action, perform process and product compliance, follow up of previous management review, and recommendation for improvement.

### 3.8.7

The mill has verified and documented the volumes of certified and non-certified FFBs received. Certified and non-certified FFB received period of 12 months before audit which is October 2021 – September 2022:

Month	FFB (ton)		Total
	Certified	Non-Certified	
Oct 2021	15,607.43	4,793.77	20,401.20
Nov 2021	18,425.47	5,647.99	24,073.46
Dec 2021	16,757.01	7,519.13	24,276.14
Jan 2022	15,320.91	6,044.78	21,365.69
Feb 2022	16,373.56	7,479.47	23,853.03
Mar 2022	22,370.90	11,639.75	34,010.65
Apr 2022	23,911.48	9,645.70	33,557.18
May 2022	25,904.98	10,230.94	36,135.92
June 2022	27,211.22	12,425.95	39,637.17

July 2022	26,185.11	9,809.71	35,994.82
August 2022	23,222.61	8,123.71	31,346.32
September 2022	18,723.91	5,783.60	24,507.51
<b>Total</b>	<b>250,014.59</b>	<b>99,144.49</b>	<b>349,159.08</b>

Estimated certified product recorded in the last assessment report (ASA-1.2). Actual certified produced has been verified during this assessment and not exceed the estimate. The data are shown in the following table:

<b>Products</b>	<b>Last Year Projected Certified Volume (MT)</b>	<b>Actual (October 2021 - September 2022)</b>
FFB Certified (MT)	323,000	250,014.59
CSPO (MT)	74,750	56,014.99
CSPK (MT)	16,250	12,136.28

According to the data during the certification period, there still not any overproduction yet.

Mechanisms for handling non-conforming products and/or documents have included in the supply chain certification standard procedure with document number SOP/SUPP/III/2022/001 effective date 22 February 2022.

### 3.8.8

The mill has product information provided in such as document of weighbridge ticket, delivery order and other invoices, as example at invoices of PK certified delivery on 29 October 2022. The informations provided on invoices are:

- The name and address of the buyer (PT Sinar Alam Permai);
- The name and address of the seller (PT Gawi Bahandep Sawit Mekar – GBSM Mill in Seruyan District)
- The loading or shipment / delivery date (29 October 2022);
- A description of the product supply chain model (Mass Balance)
- The date on which the documents were issued (29 October 2022);
- The quantity of the products delivered (10.19 ton);
- Any related transport documentation (transport by CV Bumi Makmur);
- A unique identification number (GSM0220221001975);
- RSPO certificate number (Mutu-RSPO/138);
- etc.

### 3.8.9

The unit of certification has legal ownership of CPO and PK and did not outsource its milling activities. Only transportation of CPO and PK are outsourced to the third parties, as shows through several Work Agreement as follows:

<b>No</b>	<b>CPO Transporter Name</b>	<b>Agreement Number</b>	<b>Valid Thru</b>
1	CV. Ladang Mandiri	005/GSM/P-TRA-HO/I/22	03 January 2023
2	CV. Sinar Sampit Lestari	006/GSM/P-TRA-HO/I/22	31 December 2022
3	CV. Batuah Sehati	002/GSM/P-TRA-HO/I/22	03 January 2023
4	PT. Jaya Harapan Nusa Sejahtera	004/GSM/P-TRA-HO/I/22	31 December 2022
5	CV. Hasta Karya Amerta	008/GSM/P-TRA-HO/IV/22	31 December 2022
6	CV. Berkah Rezeki Abadi	016/GSM/S-TRA-HO/IV/22	31 December 2022
7	CV. Agung Gemilang Sentosa	038/GSM/S-TRA-HO/VIII/22	31 December 2022
8	CV. Anugrah Abadi	001/GSM/P-TRA-HO/III/22	01 March 2023
9	CV. Anugrah Berlian Trans	044/GSM/P-TRA-HO/III/22	31 December 2022
<b>No</b>	<b>PK Transporter Name</b>	<b>Agreement Number</b>	<b>Valid Thru</b>

1	CV. Bumi Makmur	011/GSM/P-TRA-HO/VI/22	06 June 2023
2	CV. Anugrah Berlian Transport	012/GSM/P-TRA-HO/II/22	03 January 2023
3	CV. Tri Mitra Sejahtera	012/GSM/P-TRA-HO/VI/22	06 June 2023
4	PT. Jaya Harapan Nusa Sejahtera	014/GSM/P-TRA-HO/IV/22	31 December 2022

To ensure the contractors complies with the RSPO Supply Chain, in the agreement, there were clauses that set obligations of the contractor to comply with the supply chain rules. For instance, the responsibility to deliver products only from GBSM POM, as well as the willingness to observed by Certification Body and the company internal audit in order to verify the compliance. Based on interview with contractor (PT Jaya Harapan Nusa Sejahtera and CV Tri Mitra Sejahtera) regarding the clausal in the contract that allow CB to access the contractor, they acknowledge and understand about the provisions.

### 3.8.10 and 3.8.11

The Mill has the record of details of the contractor, covers the contractor company profile, address, contact person, email and phone number, contract agreement and period. The list of contractors of CPO and PK transporter are:

#### CPO Transporters

1. CV. Ladang Mandiri
2. CV. Sinar Sampit Lestari
3. CV. Batuah Sehati
4. PT. Jaya Harapan Nusa Sejahtera
5. CV. Hasta Karya Amerta
6. CV. Berkah Rezeki Abadi
7. CV. Agung Gemilang Sentosa
8. CV. Anugrah Abadi
9. CV. Anugrah Berlian Trans

#### PK Transporters

1. CV. Bumi Makmur
2. CV. Anugrah Berlian Transport
3. CV. Tri Mitra Sejahtera
4. PT. Jaya Harapan Nusa Sejahtera

### 3.8.12

The company has had the up-to-date record and report that are kept in mill office, complete, accurate and up-to-date. All the record can be accessed by the auditor, such as record of certified product shipping, sales contract, delivery order/invoice, production report and product sales. Based on document verification on supply chain procedure, retention time for all records and report regarding to supply chain are kept for 2 years.

For instance, record of all certified palm oil/palm kernel oil volumes purchased (input) and claimed (output) for period of 12-months before audit (October 2021 – September 2022):

#### CSPO

Month	CPO (ton)		Total
	Certified	Non-Certified	
Oct 2021 - Sept 2022	56,014.99	20,888.24	76,903.23

Month	CSPO Despatch (ton)			Total
	RSPO	Other Scheme	Non-Certified	

Oct 2021 - Sept 2022	-	-	54,337.82	54,337.82
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**CSPK**

Month	PK (ton)		Total
	Certified	Non-Certified	
Oct 2021 - Sept 2022	12,136.28	4,792.33	16,928.61

Month	CSPK Despatch (ton)			Total
	RSPO	Other Scheme	Non-Certified	
Oct 2021 - Sept 2022	3,600.00	-	7,865.00	11,465.00

**3.8.13 and 3.8.14**

The conversion rate of production of CPO (OER) and PK (KER) were based on actual daily, monthly and yearly production. The extraction rate follows the actual data for a 12-month period for October 2021 until September 2022 i.e OER 22.02% and KER 4.85%. Periodically update of extraction is actual extraction.

**3.8.15**

SCSS module used in GBSM POM is Mass Balance (MB), because the mill receives FFB from the estate RSPO certified and from smallholders and third party that non-certified RSPO.

**3.8.16**

RSPO IT Platform member registration number for Gawi Bahandep Sawit Mekar Palm Oil Mill is RSPO\_ PO1000001618. The Mill carry out shipping announcement in the RSPO IT platform when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch. For example:

- Certified PK sold to PT Sinar Alam Permai dated 18 May 2022 for 150 ton and transaction creates in IT Palm Trace dated 28 May 2022.
- Certified PK sold to PT Sinar Alam Permai dated 5 August 2022 for 150 ton and transaction creates in IT Palm Trace dated 8 August 2022.

**Removing Stock**

For the CSPO and CSPK that sold as other scheme or as conventional, the company has been removed the stock of CSPO and CSPK from the palm trace, as example remove stock of CSPO dated 10 November 2022 for 68,325.96 ton (transaction ID: ST-TR-4a0b81a1-71d6) and remove stock of CSPK dated 10 November 2022 for 10,617.55 ton (transaction ID: ST-TR-4a0b81a1-71d6)

**3.8.17**

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

Status: Comply

**PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS**
**4.1**

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

**4.1.1**

UoC showed the commitment to respecting human rights mentioned in the Palm Oil Sustainability Policy dated on 27 July 2020 using Bahasa. The commitment of the certification unit in respecting human rights has been quite well implemented in the absence of issues and incidents of human rights violations that occurred in the operational area of plantations and factories. Besides, the company regulations period of 2022 to 2024 stated that the company respects human rights and provides equal opportunities for every workers

to have the opportunity to work and associate without restrictions and discrimination or because of differences in ethnicity, religion, race and between groups.

Based on the explanation above, during the past 12 months there were no issues / incidents of human rights violations that occurred in the UoC's operational area.

#### 4.1.2

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

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

UoC had the handling information procedure No. SOP/SUPP/V/2017/004 validated on 28 October 2019 concerning in internal and external communication procedures (including grievance). The policy explained activities of handling grievances related to manpower or non-manpower (e.g: facilities, etc). In addition, there were clauses explained that complaints which have not been resolved by both parties can be proceeded to a court agreed by both parties according to the laws and regulations.

Besides, UoC also had internal grievance procedure stated in SOP of handling workers' grievance in site No. SOP/SUPP/XI/2016/009 validated by the Group CEO on 23 May 2019. The person responsible for receiving complaints is the worker's direct supervisor and the Personal General Affairs staffs. In addition, the company has an Internal Memo regarding handling complaints from external stakeholders stated in document No. IK-37/GBSM/2017 which stated that if the complaint has not met the solution, then the complaint can be submitted through the RSPO complaint panel mechanism.

Based on the interviews with the surrounding communities (Baung Village and Jahitan Village), occupants, and workers (harvesters and mill operators), the workers had a good understanding of the communication procedures and personnel who served as communicators between the company and the community so that illiterate people can be informed by the related communicators.

##### 4.2.2

Unit of certification showed SOP of handling workers' grievance in site No. SOP/SUPP/XI/2016/009 validated by the Group CEO on 23 May 2019. The policy explained activities of handling grievances related to manpower or non-manpower (e.g: facilities, etc). In the general mechanism of handling grievance, is stated as follows:

- The company's commitment to protect the anonymity of whistleblowers.
- Submission verbally or in writing to the contact person of the company or through labor union.
- Responses will be given at a maximum of 5 days.

All complaints will be summarized and recorded in the List of Complaint. However, illiterate people can submit their complaints through the village head or another representative from the stakeholder and also recorded in the List of External Complaint Monitoring.

##### 4.2.3

Based on interviews with workers and external or internal stakeholders, it's known that they have understood the person responsible and the grievance mechanism in which the complainant's identity is protected. Based on the interview with both internal and external stakeholders, they informed that there were no complaints or grievances against the UoC.

Based on the documents review of the worker's grievance logbook period of 2021 to 2022, it is known that the complaints received by the company are related to facilities. UoC then showed the compliance of these complaints. Based on the interviews with government agencies, surrounding communities, gender committees, labor unions and workers, it's known that there were no further complaints against the unit of certification.

##### 4.2.4

UoC showed the SOP of handling information procedure No. SOP/SUPP/VI/2017/004 validated on 28 October 2019 and SOP of handling workers' grievance in site No. SOP/SUPP/XI/2016/009 validated by the Group CEO on 23 May 2019. Both policies explained the mechanism of handling any grievances and access to the Manpower Agency (tripartite) and proceeded to a court agreed by both parties according to the laws and regulations.

In addition, the company also has an Internal Memo regarding handling complaints from external stakeholders stated in document No. IK-37/GBSM/2017 which stated that if the complaint has not met the solution, then the complaint can be submitted through the RSPO complaint panel mechanism.

In addition, UoC also showed the company's socialization using poster for all workers and external stakeholders posted in strategic spots e.g in front of the estate and mill office. This poster explained the mechanism of all grievances through the labor union or each worker's supervision and will be recorded in the grievance logbook. However, illiterate people can submit their complaints through the village head or another representative from the stakeholder and also recorded in the grievance logbook

**Status: Comply**

### 4.3

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

#### 4.3.1

The company already has a 2022 CSR program which has been developed from the results of consultations from Baung Village, Jahitan Village, and Muara Dua Village through Public Consultation activities. The CSR programs include:

Religious Aspect

- Assistance with mosque facilities and infrastructure
- Assistance with sacrificial animals
- Assistance on Isra Miraj Day

Education Aspect

- Scholarships for underprivileged school children
- Provision of honorariums for school teachers

Cultural Sector

- Support developing Dayak dances

Economics

- Training on Oil Palm Cultivation Techniques for independent smallholders
- Development of plasma plantations
- Development of plasma cooperative management
- Empowerment of community potential such as contractor work, giving prizes to village communities with Zero Fires.
- Formation of a Prosperous Fire Care Village

Infrastructure Sector

- Repair and improvement of the access road to the Village of Jahitan, Muara Dua Village, Baung Village
- Laterite help

Companies can also show CSR realization that has been carried out, for example:

- Assistance for the delivery of chicken livestock which was carried out on July 7 2021 in the form of chicken feed, chicken seeds and chicken coops.
- Zero fire reward assistance in the form of developing an 8-hectare oil palm plantation and 700 oil palm seeds in the village of Jahitan.
- Providing a zero-fire reward to Muara Dua Village of Rp. 100.000.000 which was done on June 15, 2021.
- Assistance in purchasing a pump machine for Muara Dua village on April 3, 2022.
- Assistance in the form of 5 units of fish cages for Baung Village on July 7 2021.

**Status: Comply**

### 4.4

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

#### 4.4.1

No change until ASA-1.3 related legality. Unit of certification has covers area for about **19,594.22 Ha.** Up to ASA-1.3, there is no land



expansion or additional operational areas in PT GBSM. Legal ownerships are remaining the same as shows through several documents, as follows:

### Land use title Decree.

Provision of Land use title by PT Gawi Bahandep Sawit Mekar with number 10-HGU-BPN-RI-2008 covering 19,594.22 ha for 35 years from February 22<sup>nd</sup>, 2008 by the Head of the National Land of the Republic of Indonesia located in Baung Village, Jahitan Village and Muara Dua Village, Seruyan District, Kalimantan Tengah Province.

### Land Use Title Certificate.

- HGU No. 23 April 21<sup>st</sup>, 2008 located in Baung, Jahitan and Muara Dua Villages ending on April 21<sup>st</sup>, 2043. NIB 15.11.00.00.00108 Measuring letter dated March 18, 2008, No. 22 / Seruyan / 2008 with an area of **19,294.88 ha**.
- HGU No. 24 dated April 21<sup>st</sup>, 2008 is located in Baung, Jahitan and Muara Dua Villages, ending April 21<sup>st</sup>, 2043 NIB 15.11.00.00.00109. Measuring letter dated March 18<sup>th</sup>, 2008, No.23 / Seruyan / 2008 covering **299.34 ha**.

### 4.4.2

The company has been developed an FPIC process that explained the procedure of land acquisition (No: 002/TAP/PRO-CSP-HO/IV/10 dated 11 February 2013). The procedures started with planning and socialization that involving estate staff and villager representatives. Land survey and measurement of land should be involving the land users to verify land ownership, handover estimation cost, and land compensation process.

PT Gawi Bahandep Sawit Mekar is a national company under the subsidiary of Triputra Agro Persada Tbk. The certification area is state land which is productive development area with partially originated from the convertible production forest (*HPK*) that has been released by forestry ministry decree No: 507/Kpts-II/2006 dated 22 November 2006. Although the company has been obtained forest release from the government, there were local rights/ traditional rights in those areas in the form of community cultivation areas. About those areas, the company can present the land acquisitions with accepted both parties. Until this audit conducted it was known there are 34 stages of land compensation with total area 14,165 Ha and 1,171 persons. Furthermore, based on document and interview with managements as well as stakeholders it was known the first land compensation starting in 24 April 2006 and last compensation was conducted on 19 March 2019.

The unit of certification can present the recapitulation of the results of the inventory of community arable land, a statement of ownership, a statement of the release of land rights, and a receipt for compensation. The evidence of compensation to the landowner in each estate and the participation of the head of the village as witnessed was documented in each estate. Overall, of compensation document was kept as historical of land acquisition by the company. All the document was signed by the company's representation early landowner and included of government at village and sub district level. Based on interviews with the previous landowners when the public consultation stated that the company had negotiated and paid for land compensation in accordance with the agreement, there was no coercion witnessed by government representatives.

The results of document verification show that the land release/compensation is bounded in the rights relinquishment agreement, which is made in Indonesian and signed by both parties and recognized by the village head, village elderly and head of sub-district. In addition to the relinquishment agreement document, it is also equipped with:

- Minutes of recapitulation of compensation payments
- Land ownerships letters
- Declaration of land ownership
- Letter of approval from wife/heirs
- Minutes of field measurement
- Minutes of verification compensation for planting
- Minutes of the inspection of land inspection measurements in the PT GBSM plantation area.

Although PT GBSM has gained land rights legally, there are still many people using and cultivating in the permit areas, it's due to the owner not willing to be compensated. The company has had the Area Statement map that described various land use in permit Areas, including area width. Based on documents verifications it was known the total of not compensate area is 49.98 Ha. That's areas managed by the community are palm oil, rubber, or horticulture. In other information, there is no significant land conflict in PT GBSM.

Based on public consultation with previous land owner and village representatives from Jahitan Village and Baung Village obtained

information if all compensation process has been held with transparent regarding to mutual agreement. Whole area that managed by the company has been compensated. The compensation process involved all community witnessed also by the Village Head, Customary leader, Sub District Head and others relevant parties. Until the audit was carried out, there was no written complaint from the community regarding the land dispute.

### 4.4.3

The company can show a map showing legal rights in the form of a HGU map with a scale of 1:50,000 contained in the HGU certificate issued by the Land Office that developed through participatory mapping. Moreover, in each compensation document there are maps that are made in a participatory manner showing the location of the area to be compensated which is signed by the land owner and known by the local government. Based on public consultation with previous land owners and also village representatives from Jahitan Village and Baung Village, it is recognized that they know the legal boundaries owned by PT Gawi Bahandep Sawit Mekar.

Based on field observations to several samples of HGU stakes determined by the auditors, namely Estate 1 (Stakes No. 48 and 49), Estate 2 (Stakes No. 149, 151 and 153) and Estate 3 (Stakes No. 87, 92, 93 and 121), it is concluded that all HGU stakes are in place according to their coordinates and are in good condition. Land boundaries with outsiders are clear, such as a large boundary road and trench that borders the HGU area. There is no indication of land use outside the HGU.

### 4.4.4

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

### 4.4.5

Based on public consultation with previous land owner and village representatives from Jahitan Village and Baung Village, known that all land acquisition between local people and company representatives conducted as mutual agreement and with Bahasa that understood by all parties involved. The compensation process is done directed to the land owner and not diminish the legal/customary right; landowners are given the freedom to release their land without coercion.

### 4.4.6

Implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties, it can be seen in the report on SIA management and monitoring for 2021 and 2022. Based on the results of interviews with stakeholders (Jahitan Village, Baung Village and plasma cooperative representatives and 3 previous land owner), it was informed that the company has had a positive impact such as employee recruitment, plasma provision and CSR assistance. There are no land conflicts between the community and the company, besides that the company regularly holds meetings with community representatives and absorbs community aspirations which are applied in company policies such as CSR or other assistance.

Status: Comply

### 4.5

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

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

There is no new planting activity during this audit. The land acquisition process includes through land compensation as described in indicator 4.4.2. Based on document Identification of HCV and stakeholder consultation, there was not found customary/indigenous rights in operational area. There were the records of the process of collecting information on the preparation of the High Conservation Values Identification Report and the Social Impact Assessment Report. The recording evidence comprising of participants' list and photographs.

Status: Comply

### 4.6

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



### 4.6.1

The company has procedure of Land Compensation, document No. 002/TAP/PRO-CSP-HO/IV/10 dated 11 February 2013 related to identifying legal, customary or user rights, and for identifying people entitled to compensation. Based on public consultation with previous land owner and village representatives from Jahitan Village and Baung Village known that they know about the procedure through the socialization given and they agree with the procedure.

### 4.6.2

The company has procedure of Land Compensation, document No. 002/TAP/PRO-CSP-HO/IV/10 dated 11 February 2013. The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on public consultation with previous land owner and village representatives from Jahitan Village and Baung Village known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the land owner and landowners are given the freedom to release their land without coercion.

### 4.6.3

PT GBSM already has cooperation in the development of plasma plantations namely Usaha Mandiri Cooperative. Based on the data from the farmers in the Cooperative, it is known that there are farmers with gender and women. This indicates that there are equal opportunities for men and women to have land rights in the plasma.

### 4.6.4

Based on the results of interviews with previous land owners, information is obtained that they have received compensation for the land they claimed and all the files for the settlement process are also kept by the person concerned. All land claim settlement processes, from identification, negotiation to compensation, are carried out through the agreement of the parties without any coercion or pressure from other parties.

The results of document verification show that the land release/compensation is bounded in the rights relinquishment agreement, which is made in Indonesian and signed by both parties and recognized by the village head, village elderly and head of sub-district. In addition to the relinquishment agreement document, it is also equipped with:

- Minutes of recapitulation of compensation payments
- Land ownerships letters
- Declaration of land ownership
- Letter of approval from wife/heirs
- Minutes of field measurement
- Minutes of verification compensation for planting
- Minutes of the inspection of land inspection measurements in the PT GBSM plantation area.

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 a procedure in place to identify people and/or community groups entitled to compensation presented in document No. 002/TAP/PRO-CSP-HO/IV/10 dated 11 February 2013. The procedure is described how to identify people and/or community groups entitled to compensation. Based on public consultation with previous land owner and village representatives from Jahitan Village and Baung Village known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the land owner and landowners are given the freedom to release their land without coercion.

#### 4.7.2

The company has procedure of Land Compensation, document No. 002/TAP/PRO-CSP-HO/IV/10 dated 11 February 2013. The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on public consultation with previous land owner and village representatives from Jahitan Village and Baung Village known that

they know about the procedure through the socialization given and they agree with the procedure and they can access the procedure through management representative of the company if they need it.

### 4.7.3

The company can show recapitulation of previous landowners who have been compensated. Based on public consultation with previous land owner and village representatives from Jahitan Village and Baung Village, the communities that have lost access and rights to land also provided opportunities to benefit from plantation development such as plasma plantation cooperation, job opportunity and other benefit in the form of CSR program.

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 and 4.8.4

Based on public consultation with related government agencies of Seruyan District and village representatives (Jahitan Village and Baung Village), known that there is no land dispute case for the last 1 years until this assessment conducted in the scope certification area. Based on interviews with management of unit certification and the results of the auditor's search on online media, there is no historical or current land dispute in unit certification.

#### 4.8.3

No evidences show that there is any acquisition process through dispossession or forced abandonment. Based on public consultation with related government agencies of Seruyan District and village representatives (Jahitan Village and Baung Village) and 3 previous land owners, known that all land acquisition between local people and company representatives conducted as mutual agreement and the compensation process are done directed to the land owner and not diminish the legal/customary right, landowners are given the freedom to release their land without coercion.

Status: Comply

## PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

### 5.1

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

#### 5.1.1

The FFB price for the Plasma Cooperative follows the FFB price for oil palm from the FFB Pricing Team at the Agriculture and Food Office of the Province of Central Kalimantan, for example the Minutes of Meeting of the Team to determine the purchase price of FFB for Production of Central Kalimantan Planters for the period September 2022. As an example, for the FFB price with a plant age of 10-20 years of IDR 2,280.22 and a plant of 24 years of IDR 2,252.22. For prices other than plasma, the FFB price is set by the Company taking into account the CPO price and the FFB price in the surrounding Company.

Based on the results of interviews with representatives of the Independent Business Cooperative, it is known that the price of FFB set by the company is based on the price from the Agriculture and Food Service of Central Kalimantan Province.

#### 5.1.2

The FFB price for farmers is determined by the Central Kalimantan Provincial Plantation Office. In determining the price of FFB, farmers are also involved. The determination of the price of FFB is always known by the plasma farmers because if there is an update on the price of FFB, the company always provides information to the cooperative leaders to inform all of its members. This is in line with the results of consultations with the management of independent business cooperatives which stated that information regarding the price of FFB would be informed by the companies via WhatsApp messages.

#### 5.1.3

As explained in indicator 5.1.2, the FFB price for farmers is determined by the Central Kalimantan Provincial Plantation Service. In determining the price of FFB, farmers are also involved. The determination of the price of FFB is always known by the plasma smallholders. The price agreement has also been explained in the cooperation agreement between the company and the farmers

where the FFB price is based on the price set by the Plantation Office. For the determination of the premium value until the appraisal activity is carried out, there has been no determination of the premium value between the company and the farmers.

#### 5.1.4

Based on the results of interviews with the Management of the Independent Business Cooperative it is known that the cooperative has understood the contract/MoU with the company and there is no coercion from the company. So far, the cooperation with the company has been going well and the Cooperative has the authority to make decisions.

#### 5.1.5

The company can show the Cooperation Agreement with the Independent Business Cooperative, namely the Cooperation Agreement between the Mandiri Business Cooperative and PT Gawi Bahandep Sawit Mekar with Number 02/KUM-SPK/PLASMA/II/2015 on March 24, 2015 with a validity period of up to one crop cycle oil palm where economically the plant is no longer productive and no longer profitable or for a period of 25 to 35 years.

Based on document verification, it is known that the agreement complies with the provisions as evidenced by the agreement of both parties, has a timeframe, is transparent, and has been known by the Regional Government.

#### 5.1.6

Companies can show proof of payment for FFB to the Plasma Usaha Mandiri Cooperative, for example for the period July to September 2022 which was paid on October 29, 2022. The results of the verification show that the payment for FFB made by the company is in accordance with the price set by the Agriculture and Food Service of Central Kalimantan Province and according to the amount of FFB originating from the Plasma area.

Based on the results of interviews with representatives of independent business cooperatives, it is known that the company has paid for the FFB according to the price set by the government. There were no complaints regarding payments made by the company.

#### 5.1.7

The company has carried out the results of weighing tests carried out by the Department of Cooperatives, Small and Medium Enterprises, Industry and Trade of Seruyan Regency, namely:

- Certificate of weighbridge test results with Number 510/147/BID.IV/III/2022 dated 17 March 2022 for Avery Weigh-Tronix scales with serial number 171450532 capacity of 50,000 Kg with results ratified for 2022 re-calibration based on RI law Number 2 of 1981 concerning Legal Metrology and will be re-calibrated on March 17, 2023.
- Certificate of weighbridge test results with Number 510/148/BID.IV/III/2022 dated 17 March 2022 for Avery Weigh-Tronix scales with serial number 134750390 capacity of 50,000 Kg with results ratified for 2022 re-calibration based on RI law Number 2 of 1981 concerning Legal Metrology and will be re-calibrated on March 17, 2023.

#### 5.1.8

The company has conducted socialization regarding RSPO certification to cooperatives/plasma farmers through annual meetings between the company and the community. The company showed the Minutes of the Annual Meeting on 21 September 2021 which involved Telaga Pulang Village, Pulang Village and Baung Village, which were attended by the company, village government, community representatives and farmer cooperatives.

#### 5.1.9

The company already has a mechanism for handling complaints for farmers in the form of SOP for Receiving and Settlement of Complaints from Stakeholders with SOP/SUPP/III/2018/001 Revision 2 which was ratified on October 28, 2019. The procedures made involve considerations from various parties. Companies must maintain the confidentiality of employees who raise complaints and ensure their safety to avoid inappropriate treatment of these employees.

Status: Comply
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### 5.2

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

#### 5.2.1 & 5.2.2

The company has conducted socialization activities for independent smallholders who supply FFB to the company. Companies can

show evidence of coaching training activities for FFB suppliers outside of PT Gawi Bahandep Sawit Mekar which was conducted on May 5, 2022 which was attended by 22 participants. The training materials include agronomy techniques, legality, RSPO, and FFB prices. This activity is the company's step in providing understanding to farmers regarding the RSPO. In addition, the company has also provided support to the Independent Business Cooperative as a plasma from the company in the form of administrative assistance and incentive assistance for cooperative management.

### 5.2.3

The company has conducted socialization activities for independent smallholders who supply FFB to the company. Companies can show evidence of coaching training activities for FFB suppliers outside of PT Gawi Bahandep Sawit Mekar which was conducted on May 5, 2022 which was attended by 22 participants. The training materials include agronomy techniques, legality, RSPO, and FFB prices. This activity is the company's step in providing understanding to farmers regarding the RSPO. In addition, the company has also provided support to the Independent Business Cooperative as a plasma from the company in the form of administrative assistance and incentive assistance for cooperative management. The company also explained that the supplying farmers, both independent smallholders and plasma farmers, already have land legality in the form of SHM and SKT.

### 5.2.4

The CH has conducted BMP training for plasma farmers, such as handling pesticides regularly. According to previous audit information, the training was conducted on March 9, 2021. In 2022, a recording of the report on the implementation of the training has been shown for the Sewing Village Community who is also the owner of the plasma on May 5, 2022 with 08 participants, located in Rudiyanto Plots.

### 5.2.5

The company has reported the progress of the plasma smallholder program in the Plantation Business Development Report which was reported to the government of Seruyan Regency.

Status: Comply
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## PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

### 6.1

#### Any form of discrimination is prohibited.

#### 6.1.1

UoC had a policy concerning on equal employment opportunity policy stated in the the Directors Decree No. SKD/CEO/VII/2022/002 validated by the Director in 2022. The group aims to provide fair and equal opportunities to all its workers. The company seeks to prevent discrimination in the workplace. In employing all employees, the company committed to the principle of equality and would not discriminating anyone in the recruitment practice or in the performance of company business operation.

UoC also showed the record of the company's socialization for instance the socialization which was conducted on 15 September 2022 attended by 24 foremans and contractor workers. Based on the workers' recruitment document and interviews with the workers, UoC had provided equal opportunities in recruitment and operational activities. In addition, in job vacancies that have been published by the company, there were no requirements that discriminated against gender, race or ethnicity, disability, sexual orientation, age, or belief.

#### 6.1.2

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

Based on the interviews with the manpower agency, gender committee, labor unions, and workers (harvesters and mill operators) at POM, Estate 1, Estate 2, and Estate 3, it is known that workers have never felt that the company has discriminated against them. It was explained that all activities from recruitment, performance appraisal, and promotion were given equal opportunity regardless of ethnicity, caste, nationality, religion, disability, gender, sexual orientation, gender identity, membership in labor unions, politics, or age. There was no difference in the communication between superiors and workers because of the things mentioned above, so the workers did not feel isolated or discriminated against by the superiors. The company also didn't request for any payment during the recruitment process.

### 6.1.3

During recruitment process, the company had set the standard of competence that required based on the offered position. Selection had include evaluation of skills, performance and medical test result. Furthermore, promotion is conducted based on work period, annual evaluation result and availability of position. All workers are treated equally in accordance with company regulation including rights of the worker as well. Records on manpower procedure had been documented, as verified randomly, e.g: Promotion documents as in personnel change notice document. For example, a worker on behalf of JD (initial) who had a promotion based on worker's appraisal, from contract worker to permanent worker in harvesting on 1 August 2022.

### 6.1.4

Based on the field observation, interviews with the paramedic and workers, it is known that there were no discriminatory in pregnancy testing given by the company. The pregnancy test conducted only to ensure that no pregnant workers in any agrochemical works such as pesticide application and fertilizing activities proven by there was no requirement regarding pregnancy test in recruitment SOP, job hiring announcement, and medical test during recruitment. UoC also showed the list of pregnant women which informed all pregnant workers are placed in non-agrochemical works such as day care officer, teacher, and housing maintenance worker.

Based on the interview with the paramedic, there was a pregnancy test during recruitment process but aimed to ensure that the pregnant worker isn't placed in any chemical works.

### 6.1.5

Gender committees had been formed in PT GBSM which are chaired by the head of gender committee. The structure of the gender committee consists of male and female workers. The main objective of forming a gender committee is to provide a forum that can accommodate the aspirations or complaints of both gender.

Based on the interviews with several workers, they also knew of the existence of the gender committee because it had been routinely socialized by the management. The last socialization related to the sexual harassment and domestic violence against women was held in August 2022 attended by female workers and housing residents. The results of this socialization can be seen by the absence of sexual harassment in company operational activities and the workers given equal opportunities for all genders (male or female).

### 6.1.6

Equal payment of wages has been made by the unit of certification properly, by considering the ability, performance, expertise, work period and other factors as a basis for remuneration. So that the payment of wages provided is in accordance with the types of work respectively. In addition, based on the documents review of structure and scale wage, it was found that the UoC already had a wage scale structure for each worker based on position and grade (not based on gender or origins). The structure and scale wage in 2022 was approved on 17 December 2021. The structure and scale wage was for all non-staff permanent worker determined by the work period, e.g: the general workers with 1 to 2 years work period got Rp. 2,500/month besides the minimum wage, while the general workers with more than 19 years work period got Rp. 27,500/month besides the minimum wage. This structure and scale wage was different for general workers, harvesting foremen, and first foremen.

Based on the interviews with workers (harvesters, maintenance workers, and mill operators), the workers already know that there was 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. Based on the document review of worker's pay slip in both gender and the interviews with the workers in the same grade and same job, it's known that the monthly wages received are in accordance with the grade owned by each worker for example: the pay slip of female worker in upkeep activity on behalf of EL (initial) and male worker on behalf of BB (initial) received the same amount of basic salary as their grade.

Status: Comply

## 6.2

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

### 6.2.1

UoC had procedures related to recruitment, selection, remuneration, promotion, retirement and termination of employment which are generally described in the company regulation period of 2022 to 2024 written in *Bahasa*. This company regulation has been signed by the head of manpower agency of Seruyan District. This document explained the working conditions and rights / obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, overtime, and other



provisions. It's applied to all workers and had been routinely disseminated by the certification unit to all workers in morning brief.

Based on the interviews with workers (harvesters, pesticide application workers, and mill operators) and labor union representatives, it concluded that workers have a sufficient understanding of their rights (wages, overtime, incentives, etc.) listed in the company regulation and in accordance with routine socialization provided by the certification unit. Workers' wages in 2022 have been above the minimum wage set by the government. Wage based on years of work period, ability, attendance and job performance (structure and scale wage) and there were no late payments every month.

Based on the explanation above, it can be concluded that the workers have understood the work requirements that have been socialized by the certification unit in an understandable language (*bahasa*).

#### 6.2.2

UoC has company regulation period 2022 to 2024 provided in *Bahasa* which has been validated by the head of manpower agency of Seruyan District with Decree 560/597/Disnakertrans/IX/2022 on 7 September 2022. The document 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. Some of these clauses were also stated in each worker's work agreement. Explanations related to the contents of the company regulation, including:

- Article number 7 concerning 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.
- Article number 14 concerning wages which explains that the lowest wage of worker couldn't be lower than the minimum wage set by the government every year.
- Article number 16 concerning social and security insurance which explains that the company committed to register all workers in social and security insurance.

In addition, remuneration is generally stated in company regulation, and specifically stated in a decree as follows: Decree of the Governor of Kalimantan Tengah No. Kpts.188.44/445/2021 concerning the Minimum Wages of city and district in Kalimantan Tengah Province in 2022 stated that the minimum wage for Seruyan District is Rp. 3,317,667.50/month.

UoC also showed the internal memo No. MI/HC/XII/2021/031 validated on 27 December 2021 regarding the workers minimum wage in 2022. The document stated the minimum wage in 2022 for PT GBSM workers is 132.720/day for daily worker and Rp. 3.317.750/month for permanent workers, probation workers, and contract workers.

#### 6.2.3

UoC showed overtime payment in March, August, and September 2022 that has been in accordance with applicable laws for workers on behalf of SP, ATS, AG (initial) as boiler operator, and JW, TD, SF (initial) as engine room operator. In the pay slip document, it's known that the nominal of the worker's overtime wages has in accordance with the overtime calculation.

A review of payslip document (harvester, maintenance worker, security, and mill operators) for March, August and September 2022, proved that the wages received were above the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2022. For example, workers' wages on behalf of SE, IS, AF, MS, and IS (initial) have a different wage based on wage scale structure in 2022 and all wages above the minimum wage. Payslip document gives accurate information on compensation consist of basic wage, allowance, overtime, working days and deduction.

UoC also showed paid leave letter which showed that maternity leave was given 3 months of paid leave. For example, the paid leave letter on behalf of LS (initial), who had given 3 months and had been approved by the supervisor in September 2022. Besides, the calculation of termination payments on behalf of JM (initial) has been in accordance with the applicable law.

Unit of certification had shown their consistency in this assessment of work agreements that are owned by every worker so there was no policy to accept family members who work without a valid work association. In addition, in the field observation activities during the audit, there were no family members of workers who helped work in the field without work ties and the workers' work agreements has in accordance with their work on field.



**6.2.4**

UoC has provided welfare facilities to occupants in the form of housing, water supply, educational facilities, mosque, school transportation, and other facilities in each unit. Based on the field visit in the housing area, it revealed that workers were provided with adequate housing facilities with 2 bedrooms and 1 bathroom also there was daycare for children. The house is inhabited by 1 family.

In addition, the company also provided waste disposal sites for domestic waste management. For health services, the company provides clinic and paramedics. Based on field observations, it's known that the facilities and infrastructure provided for workers are still functioning properly.

In general, the facilities provided by the certification unit are in good condition and sufficient quantities related to the number of workers in each unit. Based on field observation, all housing has well-maintained drainage and UoC also provided the drinking water for all workers. The certification unit has also conducted monitoring for the condition of the feasibility of the facilities provided every year, such as housing which repaired if there were damage (usually if there were any damage, the worker will inform it and it will be handled directly by the company).

**6.2.5**

UoC has provided accessible food sources by providing cooperative and small cafeteria in the workers' area who sell daily needs. In addition, there were also workers who open small business stalls to sell daily needs and food in each housing. Based on the interviews with workers (harvesters and mill operators), labor unions and gender committees, it's known that workers have no difficulty in getting food sources because the company provided cooperatives where the workers can buy they needs.

**6.2.6**

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

UoC has the determination of assessment prevailing wage and all kinds of benefit for DLW simulation in 2022 has been included in the calculation of housing facility costs, electricity and water costs, educational cost, daycare facility cost, health cost, transportation cost, and food costs. The results of these calculations are known that the standard of prevailing wage currently given / simulated by the certification unit is above the stipulation of the minimum wage, as follows: basic salary as much as Rp. 3,317,750 per month and the total wage and inkind benefits are Rp. 6,029,886 per month.

Based on interview with works and document verification, the calculation data of prevailing wages is rational in accordance with the local price (Seruyan District).

**6.2.7**

Based on the field observation and the interview with the harvesting workers in Division OC Estate 1, it's known that there's still contract workers in harvesting. In addition, based on the document review of workers' data list in Estate 1, Estate 2, and Estate 3 period of October 2022, it's known that UoC had 2,395 workers (1,356 permanent workers and 964 contract workers). Then by the 964 contract workers, the harvesting contract workers were as follows:

- a) Contract workers in harvesting of Estate 1 were 186 workers.
- b) Contract workers in harvesting of Estate 2 were 189 workers.
- c) Contract workers in harvesting of Estate 3 were 122 workers.

Harvesting work including one of the core work/permanent work, referred to the description of permanent work in Law No. 13 of 2003 (explanation of article 59 paragraph 2) stated that the permanent work is continuous, uninterrupted, not limited in time and a part of production process in a company or unseasonal work.

In addition, it stated in Government Regulation No. 35 of 2021 in the contract worker (PKWT) section explained that contract worker (PKWT) cannot be held for permanent work and contract worker can be held based on a period of time (work that doesn't take too long to complete, seasonal work, work related to new products) or the completion of a certain job (work that once completed and work that is temporary).

Based on the explanation above, the UoC hasn't been able to show enough evidence that the regulations related then contract workers has complied (Government Regulation No. 35 of 2021 and Law No. 13 of 2003) specifically related to the types of work that can be employed for contract workers. **So this indicator raised as a minor Nonconformity No. 2022.02.**

**6.2.7 | Status: Minor Non-Conformity No. 2022.02**

### 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

UoC had a policy concerning on the freedom of association stated in a Palm Oil Sustainability Policy validated by CEO Group on 27 July 2020 related to the recognition of labor union and the facility provided by the company to support labor union activities. It stated that the group respects workers' rights to freedom of association and association with other individuals and collectively expresses. The policy was published in *Bahasa* which can be understood by all employees.

Based on the interviews with labor union representatives in each unit, it explained that the company had given freedom of association and labor unions have been formed. Based on the interview with the Manpower Agency of Seruyan District, it's known that PT GBSM had two labor unions.

The establishment of the union was in accordance with the applicable laws and regulations and has been recorded in Manpower Agency of Seruyan District, as follows:

- The Registration Number. 560/678/Disnakertrans/VII/2021 of PT GBSM Labor union on 12 August 2021.
- The Registration Number. 560/1252/Disnakertrans/XII/2019 of Sinar Mentari Labor union (SPSI Sinar Mentari) on 6 December 2019.

UoC gave the freedom for worker to express their aspiration democratically and there was no intervention against labor union activity. Based on the document review, it's known that the UoC also documented the number of labor union operating in UoC operations area and its members' number, for instance: Labor Union of Sinar Mentari with 1,050 total members and Labor Union of PT GBSM with 50 total members.

Based on the interviews with labor union members representatives, permanent workers, and contract workers, it's known that there was no force or pressure to be a member of labor union. The membership of labor union was voluntary.

#### 6.3.2

UoC has documented the records of meetings between labor unions and management representatives as well as with internal labor union meetings. The following are examples of records of meetings conducted by labor unions in 2022, here as follows:

- The meeting between Sinar Mentari labor union in all units and management representative on 29 July 2022 to discuss about company regulation drafting.
- The meeting between Sinar Mentari labor union in all units and management representative on 26 August 2022 to discuss about workers' grievance and the explanation regarding allowances.

Based on the interviews with labor union representatives and their members who work in each unit, it's known that the labor union held meetings whenever it's needed. The meetings accommodated in bipartite and internal meeting and there has been no labor issue that brought to Manpower Agency.

#### 6.3.3

Based on the interviews with the labor union representatives, there was no interference in the selection or labor union operational activities. All processes of selecting, decisions making and planning activities, members' aspirations to their representatives run democratically. The worker who is currently placed as the Chairman of the Labor Union in each unit is a worker in estate, then there will be no conflict of interest that occurs with the company because there were no workers who have the authority as decision-makers (staff class and above). UoC also involved the labor union in drafted the company regulation.

The establishment of the union was in accordance with the applicable laws and regulations and has been recorded at the Manpower

Agency. Unit of certification was giving freedom for workers to express their aspirations and did not give any intervention related to labor union activity. Based on the interview with workers, it's known that there were no mandatory to be the member of labor union. The membership of labor union is voluntary.		
	<b>Status: Comply</b>	
<b>6.4</b>		
<b>Children are not employed or exploited.</b>		
<b>6.4.1</b>		
UoC had a policy concerning on children/underage worker protection stated in the Direction Decree No. SKD/CEO/VII/2022/002 validated by the Director in 2022. It stated that the group committed to not employ child labor in any operational activities and will be inform contractors and any parties regarding this policy. UoC also showed the Policy of recruitment stated in Internal Memo No. MI/HC/III/2022/003 validated on 11 March 2022 which stated that they do not employ underage worker and do administration check to make sure the age of workers candidate.		
UoC then showed that they had socialized the policy to all parties including smallholders and contractors before the agreement signed. UoC also showed agreement letter signed by the representatives of contractor as a sign that they agreed with UoC's regulation and policies.		
<b>6.4.2</b>		
Based on the document review of workers list in all units, it's known that there were no workers under the age of 18 and there was no child around the work area. UoC always asked for workers candidate's personal ID card. UoC also did not employ young worker and there were no internship program.		
Based on the interview with contractor workers and village representatives (Jahitan Village and Baung Village), it's known that they all knew the minimum age of workers.		
<b>6.4.3</b>		
Based on documents verification and field observation, there were no workers under the age of 18 and there was no child around the work area. UoC also did not employ young worker and there were no internship program.		
<b>6.4.4</b>		
UoC had socialized the policy to all parties including smallholders and contractors for instance the socialization held on 15 September 2022 to 24 participants consist of workers and contractor workers. Based on documents verification and field observation, there were no workers under the age of 18 and there was no child around the work area. In addition, UoC also includes clauses on child protection and prohibitions on hiring workers under the age of 18 in any agreements.		
	<b>Status: Comply</b>	
<b>6.5</b>		
<b>There is no harassment or abuse in the workplace, and reproductive rights are protected.</b>		
<b>6.5.1</b>		
UoC had a policy concerning on reproductive rights (company regulation period of 2022 to 2023) and the prevention of sexual harassment and violence (Palm Oil Sustainability Policy validated on July 2020 and Directors Decree No. SKD/CEO/VII/2022/002 validated by the Director in 2022). Each policy applies to all operational areas of TAP Group. The documents stated generally as follows:		
<ul style="list-style-type: none"> <li>• The company would assign pregnant and breastfeeding workers in non-agrochemical work (away from chemical contacts).</li> <li>• The company would guarantee that pregnant workers did not having contacts with chemical stuff by doing pregnancy test once a month.</li> <li>• The company would provide certain place for breastfeeding.</li> <li>• Every worker is entitled to receive protection against sexual harassment in the workplace and if convicted of sexual abuse, there will be penalized in accordance with applicable regulations.</li> </ul>		
UoC also showed the record of the company's socialization using the poster posted in UoC's strategic spots. This poster explained the mechanism of all grievances including violence and sexual harassment. However, illiterate people can submit their complaints through the village head or another representative from the stakeholder (gender committee and labor union).		

Based on the documents review and interviews with workers (harvesters, upkeep workers, and mill operators), disallowance of sexual harassment and violence had been routinely socialized by the management in morning brief.

Based on the interviews with the gender committee and daycare officer, the company had given around 45 minutes for breastfeeding woman and provided certain place for breastfeeding. There was no grievance or complaint related to sexual harassment during 2021 to 2022.

### 6.5.2

Based on the documents review and interviews with workers (harvesters, upkeep workers, and mill operators), disallowance of sexual harassment, violence, and pregnant worker in any agrochemical activities had been routinely socialized by the management, one of the socialization was carried out on 15 September 2022 which was attended by workers and occupants in Estate 3.

Based on the interviews with the gender committee and daycare officer, the company had given about 45 minutes for breastfeeding woman and provided certain place for breastfeeding. There were no grievance or complaint related to sexual harassment during 2021 to 2022.

### 6.5.3

Based on the interviews with gender committee representatives and field observation, it is known that the UoC has provided a certain place for breastfeeding at daycare with special time to breastfeed. There was no prohibition from supervisors in the field related to this matter and specifically workers in the field who do not bring a vehicle will be delivered / picked up by the foreman at these times.

UoC also showed that they had well-evaluate the needs of pregnant women by periodically identify the needs of new mother and also involved the pregnant workers. This evaluation held during monthly pregnancy check-up. UoC then showed the sample of new mothers' need identification which was conducted on 2 March 2022 attended by new mothers on behalf of EY (initial). This document informed the needs of new mother, as follows: providing baby clothes, mom's multivitamin, and pregnancy check-up.

### 6.5.4

UoC showed the procedure to accommodate complaints and grievance from employees specifically in SOP of handling workers' grievance in site No. SOP/SUPP/XI/2016/009 validated by the Group CEO on 23 May 2019. In the procedure described that if requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower). UoC also provided whistleblowing by email, company website, and letter to complaint reporting unit for any confidentiality grievance.

Based on the interviews with workers it's known that the workers already have sufficient understanding of the grievance mechanism. Related complaints of sexual harassment can be submitted to the gender committee. In the last year period, there was no complaint related to sexual harassment, violence at work/reproductive rights.

Status: Comply

## 6.6

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

#### 6.6.1

UoC had a policy concerning on force-labor ban stated in Directors Decree No. SKD/CEO/VII/2022/002 validated by the Director in 2022. The policy stated that the company respecting human rights and respecting employee rights such as the elimination of discrimination, the prohibition of forced and child labor, fair wage provisions, upholding the principle of gender equality in accordance with legal norms, and respecting the freedom of labor union.

UoC also showed the policy of recruitment stated in Internal Memo No. MI/HC/III/2022/003 validated on 11 March 2022 which informed that workers do not take any recruitment fees at any stage of the recruitment process, and no retention of passports/identity documents. UoC then showed that on each work agreement between the certification unit and the contractor/supplier, there were clauses related to fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the contractors.

Based on the interviews with manpower agency, gender committee, labor union, and workers at Mill and Estates, it's known that workers have never felt discriminated and forced to work by the company. There were no significant obstacles related to employment or violations of company regulations. UoC provided output targets that can be obtained in less than 7 hours of work. If the harvester

obtains more output within or more than 7 working hours, then the harvester will get the incentive payment. No penalty was given to the harvester if it does not get output due to natural factors such as rain. Based on pay slip document and foreman notes of harvesters daily output, the harvesters have earned more than daily output target and the wages the harvesters received was above the minimum wage.

There was no pressure/forced in doing overtime work, workers who had overtime at the company can refuse if ordered to do overtime activities because overtime is not the worker's obligation.

### 6.6.2

Based on documents review and interviews with the manpower agency, gender committee, labor union, and workers at Estate 1, Estate 2, and Estate 3, it's known that there was no migrant worker in all units. UoC still have workers with contract status (*PKWT*) for few works such as upkeep and harvesting. All the rights for each employment status has been distinguished for workers with contract status (*PKWT*) and the permanent status (*PKWTT*). There was no discrimination between contract workers and permanent workers.

Status: Comply

### 6.7

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

#### 6.7.1

The CH already has an OHS Committee referring to the Decree of the Head of the *Kalimantan Selatan* Province Manpower and Transmigration Office Number KEP.09/DISNAKERTRANS/II/2022 dated 09 Februari 2022 regarding validation of the Occupational Safety and Health Advisory Committee (OHS Committee) PT Gawi Bahandep Sawit Mekar – Estates. The Secretary with initial WA, he is a General OHS Expert who has received certification from the Ministry of Manpower of the Republic of Indonesia Number with the Registration Card number of General OHS Expert Authority 38704/PK3/AJ/62/2021/P1 dated 31 Maret 2021 and is valid for 3 years.

For POM, The CH showed the Decree of the Central Kalimantan Province Manpower and Transmigration Office number 566/110/PK.12/II/Nakertrans dated 09 February 2022 regarding the Decree of Approval of P2K3 GBSM Mill with the secretary of P2K3 with the initials OAT, but the results of the interview with the Manager of GBSM Mill, it is known that OAT has resigned in mid-July 2022. Currently the OHS Committee secretary is carried out by workers with the initials GY, who do not yet have a OHS expert license and do not yet have a letter of appointment authority from the Minister/official appointed as an OHS Expert at GBSM Mill, and have not received the latest OHS Committee Structure Decree from the relevant agency. This has been discussed in indicator 2.1.1 and becomes 2022.01 non-compliance with the major category.

#### 6.7.2

The CH has procedures for Handling Emergency Situations with numbers: PT/SUPP/XI/2017/023 dated 31 October 2017 about emergency situations and PT/SUPP/III/2016/002 about work accidents. In its implementation, The CH already has an emergency response preparedness organizational structure, which is posted on a notice board and equipped with telephone numbers for personnel who can be contacted in an emergency. From the results of observations in factories and plantations, it is known that the emergency situation structure and contact number have been posted on the notice board. Based on the document review of UoC's facilities and the field observation, UoC have a clinic.

Documentation of emergency response preparedness training has been shown in the company's report to the Seruyan Regency Food and Agriculture Security Service, such as a fire prevention simulation with Manggala Agni. Based on field observations during the fire infrastructure simulation show that the conditions of the hydrants and pumps at the factory, including at the kernel station, are in good condition and can operate properly. It is also known that there are evacuation routes and assembly points at factories and plantations. Field observations at the factory chemical warehouse also found that the placement of the hazardous waste symbol was appropriate and the emergency shower was functioning properly. First aid kits at factories and offices have been identified, as well as first aid bags at plantations in proper condition. The results of interviews with first aid workers both at the plantation and at the factory revealed that they already understood the function of first aid. Based on the document review also revealed that the company already has 17 licensed first aid kits.

#### 6.7.3

PPE use

The company shows the PPE Technical Procedure, with the code PT/SUPP/VI/2017/019 which takes effect from 01 January 2019. This guide regulates, among other things, the provision of relevant PPE for employees and guests by the company, the use of PPE, inspection and supervision of the use of PPE by each supervisor, maintenance and replacement of PPE. This procedure also regulates:

- Harvester PPE including wearing a face shield while working.
- PPE for fertilizer workers and foremen including wearing goggles, dust filter masks (cartridges), cloth and leather gloves, aprons and boots).
- PPE for transporting fruit, including using a safety helmet.

From the results of field observations, it is known that there is still use of PPE that is not in accordance with PPE procedures and related regulations owned by the company, as follows:

- Harvesters in Block I25 Division OH Estate 1 do not use face shields when working.
- Fertilizing Block J24 Division OH Estate 1 wearing a hat and sneakers when supervising fertilizer work. There are also fertilizer workers who do not wear masks while working.
- It was found that the FFB was transported using a grabber in Block F15 Division OC Estate 1. It was found that the operator did not wear a safety helmet while working.
- There was 1 FFB transport truck driver who did not wear leg protectors (barefoot) and 2 FFB transport truck drivers who used sandals at the PKS security post even though there was an announcement from the Mill Manager on September 19 2022 attached to the security post which informed that all truck drivers TBS must wear PPE safety helmet and shoes.

Based on this evidence, it is known that there are still workers in the plantations as well as FFB transport truck drivers who do not use PPE in accordance with company procedures and regulations. This has become a 2022.03 non-conformity with a major category.

### 6.7.4

UoC provided health services such as clinics and paramedics. Based on field observations, it was known that the facilities and infrastructure provided due to medical services for workers are in proper condition. Based on the documents review and interviews with workers (harvesters, pesticide applicators, mill operators), it revealed that all workers were registered in the BPJS program and they were registered as their working period. The BPJS has been paid for all workers in accordance with the number of total workers in its payment period, proven as follows:

- BPJS (Health Insurance) payments for 692 workers in Estate 2 have been completely fulfilled and the last proof of payment is on 7 September 2022 for period of September 2022.
- BPJS (Social Security Insurance) payments for 725 workers in Estate 1 have been completely fulfilled and the last proof of payment is on 6 October 2022 for period of September 2022.

Based on the interviews with workers (harvesters, pesticide applicators, and mill operators) and labor union, they informed that they had the acknowledgement of their involvement in BPJS program and they also held the BPJS card.

### 6.7.5

The CH has recorded work accidents using LTA. The record for 2021 has been shown as follows:

Number of lost time injuries in GBSM POM	: 2
Total hours worked in GBSM POM	: 374220
Lost Time Injury Frequency Rate (LTIFR) in GBSM POM	: 5.34
Number of lost time injuries in Estates	: 2
Total hours worked in Estates	: 3791974
LTIFR in Estate	: 0.53

6.7.3 Status: Nonconformity 2022.03 with major category

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, 7.1.2, 7.1.3

The CH has procedures for controlling pests and plant diseases with the code PT/EST/IX/2021/075 which regulates the census and its control. The results of a census of pests such as caterpillars, bagworms, Thirataba, termites and rats have been shown. For example, the results of the October 2022 census on Estate 1, it is known that there were no attacks by fire caterpillars, bagworms, and thirataba. Meanwhile for termites and rats there are new attacks, but they are still below the control threshold. From the results of field observations at all assessment sites and interviews, it was found that there were no signs of pest attack.

Based on observations, it is known that the company develops *Antigonon leptopus* which is planted on the roadside of MR and CR, such as in Block C59 Division OV Estate 3. It has also been shown the management of Owls with Barn Owl Boxes, such as in Block J12 Division OD Estate 1 and Block C60 Division OV Estate 3. Based on field observations and interviews with management representatives, it is known that the company does not use invasive species in its operations. It is also known that there is no use of fire in pest control.

Status: Comply

## 7.2

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

#### 7.2.1, 7.2.2, 7.2.3, 7.2.4, 7.2.5

The justification for using pesticides is contained in the SOP and work instructions for weed control. Related to the selection, storage, application, handling of contaminants, knowing the signs and symptoms of pesticide poisoning and first aid in cases of poisoning have also been regulated in company procedures. The results of field observations in the spray works of Block C16 Estate 1, Block F36 Estate 2, and Block C60 Division OV Estate 3, it is known that one of the herbicides applied is starlon for broadleaf weeds. Starlon has been registered with the Fertilizer and Pesticide Commission with RI code. 01030120072899 and distribution permit January 14, 2027. Starlon has the active ingredient triclopyr, with an LD50 of 2092 mg/Kg, with the use of pesticides of 0.049 liters/ha.

Starlon belongs to WHO class II. The results of field observations at the location of the audit assessment and interviews with workers also found that there was no use of paraquat. The results of the document review also show that The CH does not use paraquat, class 1a, class 1b pesticides, the Stockholm convention and the Rotterdam convention. It is also known that there is no preventive/prophylactic application of pesticides. For the use of pesticides, in general decreased. For example, the use of starlon in 2021 is 0.35 l/ha, while in 2022 it is 0.049 liters/ha.

#### 7.2.6

Based on observations on spraying activities in Block C60 Division OV Estate 3, it is known that workers have been able to explain and apply work techniques according to procedures. The CH indicated that periodic training had been carried out, such as training for spray workers at the OC Division on 07 October 2022, the OR Division on 27 September 2022, and the OFG Division on 27 October 2022.

#### 7.2.7

Based on field observations at Warehouse Agrochemical Estate 1 and Estate 2 show that the storage of all pesticides is in proper condition, accordance with recognized best practices, namely referring to PP No. 74 of 2001 concerning Management of Hazardous and Toxic Materials. Based on the results of field observations, it can be explained that the storage areas have been equipped with hazardous materials symbols, MSDS, ventilation, channels to accommodate pesticide spills, eyewash and showers, fire extinguishers, first aid kits, emergency handling pathways, stacking shelves according to packaging and others.

#### 7.2.8

Based on field observations at the Chemical Warehouse, as well as interviews with operators at each Plantation and Factory, it is known that containers of used pesticides will be stored in temporary shelters for Hazardous and Toxic waste which are built taking into account OHS and environmental aspects. The water used for rinsing will be reused as mixing water for chemical activities.

Based on the results of a field visit to the employee housing area, it was found that there were no traces of pesticide packaging that were reused as flower pots.

#### 7.2.9, 7.2.11

Based on field observations and interviews with workers, it is known that there is no application of pesticides by air. Application is

carried out by spraying. It is also known that there are no workers who are pregnant or breastfeeding. There is a prohibition for workers who are pregnant and breastfeeding to work using pesticides. These workers are transferred to jobs that are not related to pesticides.

### 7.2.10

The CH has implemented an MCU for workers dealing with pesticides. The minutes of the MCU Estate and Mill workers who were at high risk on March 30-31 2022 have shown, in the form of cholinesterase for workers exposed to chemicals. It is known from the results of the examination that there are workers with the initials NNR who are exposed to pesticides with cholinesterase exceeding the threshold, which is recommended to change jobs not related to pesticides. Following up on this recommendation, The CH has transferred the worker from a pesticide mixing officer to a spare parts warehouse officer.

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

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

### 7.3.1

The company shows identification of waste sources for the 2021/2022 period with details: ex sacks of fertilizer, inner plastic of fertilizer sack, used oil from generator, used neon/lights, wastewater, EFB, Shell, fiber, dash of boiler, domestic waste, paper and others.

Sources of emissions include:

- CO2 Gas: Transportation of FFB, CPO Shipping, Operation of heavy equipment, operation of generator & electric pumps, management of WTP, boilers, laboratory activities, waste ponds and Mill processes.
- Gas NO2 & SO2: Activities in the laboratory.
- Gas CH4: Fertilizing activities and WWTP ponds.

### Hazardous and Toxic waste

Hazardous Waste generated by Estates and Factories will be stored in the Temporary Storage Site with a licensed Hazardous Waste, then transported by a licensed third party which will then be handed over to a licensed hazardous waste manager. The company has a permit for Temporary Storage of Hazardous Wastes and is still valid for both Estate and Factory in accordance with the Agreement on fulfillment of commitments in the context of issuing commercial/operational permits for temporary storage of hazardous and toxic waste materials to PT Gawi Bahandep Sawit Mekar with Number 503/999/ DPMPSTSP/XII/2019 on December 23 2019 from the One Stop Investment and Services Service with a validity period of 5 years.

In terms of transporting hazardous waste, the company cooperates with a licensed hazardous waste carrier, namely PT Semesta Langgeng Sentosa. The company can show a cooperation agreement with the carrier, namely the Work Agreement between PT Gawi Bahandep Sawit Mekar and PT Semesta Langgeng Sentosa with Number 24/SPK/SLS-GBSM/I/2022 on January 18, 2022 and valid until January 18, 2023.

The company can show the official report and manifest for the transportation of hazardous waste on August 5, 2022, which was carried out by the carrier with Vehicle Number KH 8711 GN. The types of hazardous and toxic waste materials submitted are for example:

- Used battery of 0.744 tons with Manifest KLHK-166262696
- 0.292 tons of used filters with Manifest KLHK-1662625404
- 0.3719 tons of used packaging for hazardous and toxic materials with Manifest KLHK-1662601852.
- 0.0845 tons of medical waste with Manifest KLHK-1664005791
- 2.7 Tons of used oil with Manifest KLHK-1662604264

### Solid waste

The solid waste produced by the company is shell, fiber and EFB. 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. This is evidenced by the results of field visits during the audit activities that the company had used shells and fiber for boiler fuel, while EFB was reused for plantation land.

### POME

POME produced from the factory is reused for Land Applications. Before being distributed to LA, POME is first managed at the WWTP with the aim that the quality of the POME that is distributed to LA is in accordance with the provisions. This is evidenced by the results of a field visit at the WWTP, it was found that before being distributed to LA, POME was first at the WWTP, besides that there was no indication of environmental pollution by the company.

Based on document verification, field observations, and interview results, the following evidence was obtained:

- The SOP for the management of hazardous and toxic waste (B3) with Number PT/SUPP/II/2018/026 explains that each division that produces hazardous waste is required to submit hazardous waste every day to the warehouse staff to be placed in the Temporary Storage of Hazardous Waste.
- Internal Memo No. MI REVISION-02/GM/ADM/II/2020 dated 28 February 2020 from the General Manager explained in point 15 that it is forbidden to use hazardous waste packaging to store water and other purposes.
- The identification document for the source of waste from the Estate and Factory of PT Gawi Bahandep Sawit Mekar Year 2022 explains that packaging of used pesticides/chemicals must be stored in the Hazardous Waste Temporary Storage.
- Results of interviews with company representatives revealed that types of waste such as Plastic/Inner Fertilizer, Expired Pesticides and used packaging for hazardous materials must be submitted to the Temporary Storage for Hazardous Waste and will then be transported by a licensed carrier.
- Based on the results of field observations, it was found that hazardous waste management was not in accordance with the SOP, namely:
  1. 2 Pcs Used oil packaging in the Division OH Estate water reservoir 1
  2. Plastic/Inner Fertilizer in Blocks J24, J25, K09, K12, and J11 Estate 1
  3. There are quite a lot of used oil drums as water reservoirs in Housing Division D and I Estate 1
  4. 3 pcs of used herbicide packaging and 5 pcs of used paint packaging as a water reservoir in Division D and I Estate 1 Housing
  5. Plastic/Inner Fertilizer in Block E35/36, Block B20 and Block C32 Estate 2
  6. 3 Pcs Pesticides brand Matador, Dipel, and Capture expired Chemicals Warehouse in Estate 2.
  7. 3 Pcs of used paint packaging and 4 Pcs of used oil packaging at Division G Estate 2 Housing
  8. 11 Pcs Used Oil Drums as water reservoirs in the Mill housing.
  9. 6 Pcs of used hazardous materials packaging and used paint packaging in Mill housing

Based on this evidence, the Company has not been able to demonstrate that the implementation of the waste management plan has been carried out in accordance with the procedures it has. **NCR No 2022.04 with Minor Category.**

### 7.3.2

Based on interviews with company management, Estate Managers, and Warehouse Officers, it is known that they have understood the handling of waste disposal, especially hazardous and toxic waste and non-hazardous and toxic waste according to the procedures owned by the management unit. Based on the results of field visits to residential areas, it is known that the management of domestic waste is in accordance with company procedures.

### 7.3.3

Based on document verification and field observation results, the following evidence is obtained:

- Internal Memo No MI REVISION-02/GM/ADM/II/2020 dated 28 February 2020 from the General Manager explained in point 12 that do not litter, waste is separated according to its type (organic and inorganic) and waste may not be burned.
- Based on the results of field observations, it was found that waste management was not in accordance with the Memo of the Internal General Manager, namely:
  1. 3 Trash burning in the Division O Estate housing complex 2
  2. 1 ex-burning waste in Mill housing

Based on this evidence, there is still domestic waste management by burning which is not in accordance with the Internal General

Manager's Memo that has been owned by the company. NCR No 2022.05 with Minor Category		
7.3.1	Status: NCR No 2022.04 with Minor Category.	
7.3.3	NCR No 2022.05 with Minor Category	
<b>7.4</b>		
<b>Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</b>		
<b>7.4.1</b>		
The CH has procedures related to fertility and fertilization, as follows:		
<ul style="list-style-type: none"> <li>• Document No. 024/PT/II/2014 about manual manuring.</li> <li>• Document No. 025/PT/II/2014 about mechanical manuring.</li> <li>• Document No. 026/PT/VIII/2014 about organic fertilizer and land application.</li> <li>• Document No. 039/PT/XII/2014 about manuring on the nursery.</li> <li>• Document No. 050/PT/VIII/2014 about leaf sampling.</li> <li>• Document No. 052/PT/IX/2014 about nutrients and nutrient deficiency symptom.</li> <li>• Document No. 059/PT/IX/2014 about top soil application through empty fruit bunch mulching.</li> <li>• Document No. 069/PT/VIII/2014 about soil sampling.</li> <li>• Document No. PT/EST/X/2015/031 about fertilizer sampling.</li> </ul>		
Based on field observations in manual fertilization activities in Block J24 Division OH Estate 1, fertilization using a fertilizer spreader in Blocks L25 Division OJ Estate 1 and Block B20 Estate 2, Block D40 Division OQ Estate 3, it is known that workers understand and apply the technical work of fertilization in accordance with procedure.		
<b>7.4.2</b>		
The CH has conducted analysis of soil and leaf samples as fertilizer recommendations. Records of periodic analysis of leaf and soil samples have been shown to monitor and manage changes in soil fertility and plant health, which among others are shown as follows:		
2021		
<ul style="list-style-type: none"> <li>• Soil analysis 2022 for the Estate 1 on June 2, 2022 with 4 samples.</li> <li>• Leaf tissue analysis of Estate 1 in 2022 for September 1-2, 2022 for 121 samples.</li> <li>• Soil analysis 2022 for Estate 2 in February 3, 2022 of 72 samples.</li> <li>• Leaf tissue analysis of Estate 2 in 2022 for 02-04 April 2022 for 72 samples.</li> <li>• Soil Analysis for the Estate 3 on 3 – 26 February 2022 with 44 samples.</li> <li>• Analysis of the leaf tissue of Estate 3 in 2022 for 23 June 2022 with 37 samples.</li> </ul>		
<b>7.4.3</b>		
The CH already has a nutrient recycling strategy procedure with code 059/PT/IX/2014 regarding top soil and EFB applications. The CH has turned EFB into compost. It has been shown that the distribution of compost to Estate 3 is 19,168 tons and Estate 3 is 11,774 tons. Based on field observations in Block L12 Division OI Estate 1 show that there is an application of EFB in the field at a dose of 20 tonnes/ha/year. The CH also conducted a land application. Based on field observations in Block C32 Estate 2, it is known that the land application has been carried out properly and nothing has overflowed into the ditches/bodies of water.		
<b>7.4.4</b>		
Records of fertilization applications, both organic and inorganic, are available. For organic fertilization it has been discussed in indicator 7.4.3, while for inorganic fertilization a record of its use has been shown. The results of the review of planning documents and the realization of fertilization up to October 2022, it is known that the application of fertilization has not been 100%. For example, 96% of 15,301 tons of Urea has been applied and only 85% of 23,184 tons of NPK 13 has been realized. The results of interviews with company representatives found that the arrival of fertilizer in semester 1 was late, so the application in general was also late.		
<b>Status: Comply</b>		
<b>7.5</b>		
<b>Practices minimize and control erosion and degradation of soils.</b>		
<b>7.5.1</b>		
The CH shows Soil Map and Slope Map, derived from soil survey conducted in January 2013 and observation by Minister of Environment and Forestry in 2016, summarized as follows:		

It was known that about 35.43 %, 32.83 % and 31.74 % of soils were categorized as mineral, sandy and peat, respectively. Furthermore, peat depth was varying from shallow (50-100 cm) and medium (100-300 cm), and there is no presence of deep peat soils (depth >300 m). Main limitation for oil palm cultivation was mainly due to very acidic on peat areas, as well as presence of sandy soil textures, which covers about 64.57 %. Proper drainage system on peat areas and organic content enhancement on sandy soil areas has become a part of strategy to overcome this kind of limiting factors. It was known that 99.32 % of slope condition in PT GBSM operational areas were flat with the rest was undulating. Some prone to flooded areas becomes limitation factors, thus proper drainage management system is needed to overcome this matter. It was known too that 99.32 % of slope condition in PT GBSM operational areas were flat with the rest was undulating. Some prone to flooded areas becomes limitation factors, thus proper drainage management system is needed to overcome this matter.

According to the explanation above, it was known that there is no fragile soils category but marginal, due to presence of shallow to medium depth peat and presence of sandy soil areas. Limitation were mainly due to poor drainage properties, low-lying which prone to flooded, acidic soils, low fertility, as well as presence of sandy soil areas.

### 7.5.2, 7.5.3

Based on document review, interviews with management and field observations, it is known that the company has not replanted oil palm and no new plantings.

Status: Comply

## 7.6

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

### 7.6.1

The CH shows Land or Soil Suitability Map (Reg. No. 006941025022021), summarized in the following Tables:

#### Land Suitability Distribution

Suitability Class	Distribution (%)
S1 (Suitable)	-
S2 (Slightly Suitable)	57.15
S3 (Marginally Suitable)	5.45
N1 (Currently Not Suitable)	37.41
N2 (Permanently Not Suitable)	-
<b>Total (%)</b>	<b>100.00</b>

Based on the table above, it was known that land suitability class of PT GBSM operational areas before management input was around 57.15 % has categorized as slightly suitable (S2), while the rest was dominantly currently not suitable. With proper management input such as satisfactory drainage and water management system, subsidence monitoring, organic material enhancement on sandy areas and good manuring schedule, land suitability on those marginal (N1 and S3) areas could potentially enhanced into S2 level.

### 7.6.2, 7.6.3

Based on document review, interviews with management and field observations, it is known that the company has not replanted oil palm and no new plantings.

Status: Comply

## 7.7

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

### 7.7.1

Based on document review, interviews with management and field observations, it is known that the company has not replanted oil palm or new planting yet.

### 7.7.2

Representatives of The CH stated that peat areas within managed areas were inventoried, documented and reported to the RSPO Secretariat. During the previous audit, information was provided regarding the peat inventory which was reported on 3 February 2008. The CH showed evidence of communication with the RSPO GHG unit up to 10 February 2021 regarding peat inventory. The CH shows the data sent to the RSPO regarding the area of peat that has been inventoried, which is 4305.47 ha.

### 7.7.3

The number of subsidence poles in the company is 18 for 4,305.47 ha. Which means there is a subsidence pole every  $\pm 240$  ha, according to RSPO guidelines. The CH has been monitoring peat subsidence periodically. The records contained in the Peat Subsidence Report Recap for the period July – October 2022 have been shown. As an example of monitoring in Block E19 Division OB Estate 1, there was a decrease of 3 mm in the measurement on 12 October 2022 compared to 15 September 2022, that still in accordance with the Regulation of the Minister of Environment number 7 of 2006. The results of field observations in Block K09 Division OE Estate 1, Block 39 Estate 2, and Block F43 Division OR Estate 3, it is known that there is a subsidence pole which is one of the monitoring points for the decline of peat in the company.

### 7.7.4

The CH already has a water management and land cover program in the peat area. One of the measures taken is to monitor the groundwater level (water table) on the piezometer in the block. Monitoring is carried out every 2 weeks. Monitoring reports for the period January - October 2022 have been shown, such as in Block H29 Estate 2 during monitoring on 03 October 2022 the height was 40 cm and on 15 October it was still 40 cm. The results of field observations in Block G39 Estate 2 and Block F43 Estate 3, it is known that there are loggers (a machine for measuring groundwater determined by the Ministry of Environment and Forestry). The determination of monitoring points is indicated in the Decree of the Director General of Pollution Control and Environmental Damage number SK 111/PPKL/PKG/PKL.0/12/2017 where there are 68 monitoring points in Estate 1, 2 and 3. Water level monitoring has also been carried out in surface ditches, such as those in Block D42 Division OQ and stop bunds in Block D46 Division OQ. The results of field observations also revealed that the peat area already contained *Neprolephis bisserata* as a land cover.

### 7.7.5

Based on a study of the year of planting and OCM (Organic Clay Material) maps revealed that the area of peat planted in 2006 was 286 ha and 2007 was 598 ha. Based on the RSPO Procedure for Drainability Assessment 2021, it is stated that a DA Report needs to be prepared prior to land clearing/Replanting of oil palm on peat. Replanting cannot take place until the DA report has been submitted for review, and RSPO approval. It stated that given the difficulty for the company/auditor to determine the exact date of Replanting in the future – the reference date for the initial DAP to be prepared is 15 years after the previous planting on peat which should be recorded in company records. Based on this, companies are encouraged to carry out DA in accordance with the RSPO Drainability Assessment Procedure 2021. This is an opportunity for improvement (OFI) for the company.

### 7.7.6

The number of piezometers refers to the Decree of the Directorate General of Pollution Control and Environmental Damage number SK 1.1.1/PPKL/PKL.0/12/2017 with 68 monitoring points. While in the RSPO guidelines, for an area of 4,305.47 ha, 39 piezometer monitoring points are required, so that the number of piezometers has been fulfilled. Based on field observations at all assessment sites during the audit revealed that water management had been carried out, such as making stop bunds to maintain the groundwater level, monitoring the water level in surface ditches, monitoring the water table using a logger, monitoring peat subsidence, and covering land with the management of *Neprolephis bisserata*. As an effort to anticipate fires, fire warnings have been posted and prohibitions on playing with fire in the fields, as well as documented routine patrols. Monitoring is also carried out using the fire tower.

### 7.7.7

There is no new land clearing on peat areas in PT GBSM operational areas. Palms were planted between 2006 to 2016. This is in accordance with the results of field observations in all assessment areas during the audit, no new plantings were found.

Status: Comply
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## 7.8

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

#### 7.8.1

The company has implemented a water management plan consisting of:

- Do not apply chemicals in river border areas
- Not disposing of liquid waste into rivers but reusing it on plantation land. Before being used, liquid waste is first managed at the WWTP so that its quality meets the standards set by the government.
- Utilizing water for factory processing in accordance with the standards set by the company.
- Conduct river water quality testing.



- Protection of wetlands/peat with maintenance of water levels.

Based on field observations through the Bakung River border area block H38 Estate 2, it can be seen that the company has managed the water source by installing signs with signboards as HCV areas and HCV markers as signs/delimiters between HCV areas and Planted areas. In addition, the condition of the border is not planted with oil palm and the company has planted plants such as *Belangiran*, *Jelutung*, *Mahang*, and *Gelam*.

The company has a surface water quality monitoring program that is carried out every semester by a KAN-accredited laboratory (LP-195-IDN) on May 10, 2022. The monitoring location is on a river for the scope of the company's operational area, namely the Kelua River inlet and Outlet, River Inlet and Outlet Daffodils. Currently the company is testing surface water using quality standards that refer to PP 22 of 2021 Class II. Based on the test results it is known that all parameters such as pH, BOD, COD, TSS, TDS are still in accordance with the standards set in PP No. 22 of 2021 Class II. The results of the test will then be reported to the relevant Office through the RKL-RPL Report every semester.

The results of observations and interviews with workers note that the company has also provided access to clean water to workers by providing hygienic water for drinking and water for daily needs.

#### 7.8.2

Wet streams in company areas are protected by the company. This is evidenced by the results of field observations in the Bakung River riparian area block H38 Estate 2, it is known that the riparian is protected by the company. The river border area is still forested and there is a signboard warning to protect the river border area. In addition, until the Surveillance 1.3 activity was carried out, the company did not carry out replanting activities.

#### 7.8.3

Companies can show documents on the results of measuring the quality of liquid waste applied to land, namely documents on the results of testing liquid waste for the period July 2021 – September 2022. Tests are carried out by a KAN-accredited laboratory (LP-195-IDN) using quality standards referring to Minister of Environment Decree Number 28 of 2003. Based on the results of the analysis of the test documents, it shows that all the parameters tested are in accordance with the applicable quality standards. As an example of the test results for the period September 2022 with BOD 135 (Standard: <5,000) and pH 8 (Standard: 6-9) and for the July 2022 period with BOD 724 (Standard: <5,000) and pH 8 (Standard: 6-9). In addition, the test results for the December 2021 period showed a BOD of 1,493 (Standard: <5,000) and pH 8 (Standard: 6-9).

Based on the results of interviews with the Environmental Service regarding the management of liquid waste at the WWTP, there were no issues related to environmental pollution. The results of interviews with the community from the villages around the company also stated that there was no pollution from the liquid waste produced by the company.

The company already has a permit for the utilization of liquid waste for Land Application (LA) with number 188.45/338/2016 based on the Decree of the Regent of Seruyan Regency with a validity period from August 1, 2016 and ending for 5 years. Companies can also show technical approval for the utilization of liquid waste by application to land No. 660/06/DLH.II/2021 on July 30, 2021 from the Seruyan Regency Environmental Service (as an LA Permit Extension). The results of interviews with the Seruyan Regency Environmental Service and company representatives found that currently there is no longer any permit extension, as long as there is no change, the old permit will remain valid.

Based on the results of field observations in the Land Application Block C32 Estate 2 area, it is known that the location of the liquid waste application on the land corresponds to the location stated on the Land Application Permit, apart from that there is no indication of overflow of liquid waste flowing. Observations at WWTP also note that liquid waste has been managed at WWTP, there is a pond to carry out liquid waste management, there are no indications of leakage and overflow in the WWTP pool and a flow meter to calculate the amount of liquid waste flowing into the application area is available and functioning properly.

#### 7.8.4

Companies can show the results of recapitulation of water use for the period January-October 2022, namely the use of water for processing FFB of 263,470 m<sup>3</sup> with an average use of water for processing FFB every month of 26,347 m<sup>3</sup> or 1.20 M3/ton FFB. The data shows that the company uses surface water that is in accordance with the quota set by the company, which is 1.50 m<sup>3</sup>/ton FFB.

Water Resources Exploitation Permit in accordance with the Decree of the Head of Investment Service and One Stop Integrated Services of Central Kalimantan Province Number 570/06/DPUPR-IPAP/I/DPMPSTP-2018 concerning permits for surface water exploitation of the Seruyan River in the Village of Sewing, District of Seruyan Hilir, Regency Seruyan Central Kalimantan Province by PT Gawi Bahandep Sawit Mekar on February 8 2018 with a validity period of 5 years. There is no water withdrawal quota in the permit.

The company can also show proof of payment of surface water fees for the September 2022 period to the Regional Treasury of the Central Kalimantan Province on October 23, 2022 and the payment is in accordance with the surface water tax bill from the Regional Revenue Management Agency for the Province of Central Kalimantan.

Status: Comply

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

**7.9.1**  
The company has energy efficiency documents for the period August 2021 – July 2022 for the use of fossil fuels or the use of renewable fuels. The calculation of efficiency using fossil fuels for the period September 2021 - October 2022 is concluded as follows: Processed FFB of 280,175.19 Tons using renewable fuels such as shells of 5,574 Tons and Fiber of 30,899 Tons. The turbine produced from the use of Shell and Fiber is 11,068,672 Kwh or 39.50 Kwh/Ton FFB, while the generator used is 269,195 Kwh. The efficiency of renewable energy used by the company is 97%.

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**  
At the time Surveillance 1.3 was carried out, the company had not yet calculated Palm GHG for the 2022 period (January-December 2022). For the calculation of Palm GHG, the previous period, namely 2021 (January-December), has been carried out in the previous assessment (ASA 1.2). Thus, the calculation of Palm GHG for the 2022 period cannot be carried out.

**7.10.2**  
The company has conducted a study of carbon stocks and greenhouse gas emissions conducted by Bioref IPB in 2016 at PT Gawi Bahandep Sawit Mekar. The results of the study stated that the total carbon stock in the HGU area of PT Gawi Bahandep Sawit Mekar was 85.01 kilo tons-C with low-density forest carbon stocks being the largest contributor to the total carbon stock in the HGU area of PT. Gawi Bahandep Palm Oil Mekar. The carbon stock value for each cover stratum is one of the factors for calculating net GHG emissions which is then used as a baseline for assessing the success of mitigation practices in sustainable oil palm plantation management.

**7.10.3**  
Based on document review and interviews with company representatives, it is known that there are no new developments. The company has identified pollution sources at PKS and Estate, the document informs sources (stations/activities), sources of pollution and emissions, impacts (humans, work equipment, environment) and impact control. For example, from the boiler it produces boiler ash, steam and chemical pollution, from the engine room it produces pollution in the form of noise.

Efforts to reduce pollutants carried out by companies include:

- Monitor air quality and emissions from boilers and generators
- Manage POME in WWTP before it is used in plantations
- Perform regular machine maintenance.
- Optimizing the use of fertilizer according to recommendations
- Use of fibers and shells in the Mill to reduce diesel.

The company has conducted emission tests from boilers and generators, as well as ambient air quality which will be carried out in semester 1 of 2022 by a KAN-accredited laboratory (LP-195-IDN). Based on the results of the document review, it is known that the results of the tests carried out are in accordance with the provisions stipulated by the Government.

	Status: Comply	
<b>7.11</b> <b>Fire is not used for preparing land and is prevented in the managed area.</b>		
<b>7.11.1</b> Based on the verification of the areal statement document, it is known that there were no new plantings made by the company. In addition, there is no replanting activity carried out by the company. the results of field observations during the audit activities revealed that there were no indications of former land burning by the company.		
<b>7.11.2</b> In determining actions to prevent and control land fires, the company carries out several activities, namely: <ul style="list-style-type: none"> <li>• Fire emergency response simulation training for employees, for example on 9 September 2022 for Estate 3, 27 April 2022 for Estate 1, and 20 April 2022 for Estate 2.</li> <li>• The company has an emergency response team to handle fire emergencies. The company has an emergency response team for each estate and mill.</li> <li>• Have emergency response facilities and infrastructure for prevention and control of land fires.</li> <li>• Conducting socialization on land fires to the surrounding community, for example what was carried out on August 2 2022 which was attended by 33 local communities from the Jahitan Village, Muara Dua Village, Baung Village, Sub-District Head, and Representatives of the Regional Disaster Management Agency.</li> <li>• Monitor land fires through fire patrols, hotspots, and through fire towers which are carried out every day. For example, the results of fire monitoring for the December 2021 period note that there were no hotspots in the company area.</li> <li>• Forming Prosperous Fire Care Villages (DMPA) in surrounding villages, namely Baung Village, Stich Village, and Muara Dua Village. In addition, the company gives awards to the surrounding villages if there are no fires within 1 year in the form of cash.</li> </ul> <p>The auditor team has also carried out a fire control simulation on the fire task force team in Estates 1, 2 and 3 as well as testing the company's fire control facilities and infrastructure. The simulation results show that the Company's fire task force team can carry out the simulation properly and that firefighting equipment can be used at any time.</p>		
<b>7.11.3</b> The company has also involved stakeholders in adjoining locations for fire prevention and control measures by conducting socialization on land fire control to the community, for example on August 2 2022 which was attended by 33 local communities from the Village of Jahitan, Muara Dua Village, Baung Village, Camat, and Regional Disaster Management Agency Representatives. The company also established a Prosperous Fire Care Village (DMPA) in nearby villages, namely Baung Village, Stich Village and Muara Dua Village. In addition, the company gives awards to the surrounding villages if there are no fires within 1 year in the form of cash. The results of field observations during the audit activities found that in the company area there were also signboards prohibiting land burning activities and the danger of land fires.		
	Status: Comply	
<b>7.12</b> <b>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.</b>		
<b>7.12.1</b> The company has been clearing land since November 2005 without prior HCV assessment because the HCV assessment was carried out in 2013 and the company started planting in 2006. To comply with the requirements and Remediation and Compensation Procedures, PT GBSM is required to submit a Land Use Change Analysis report to RSPO for review by the Compensation Panel. October 2017 and RSPO review phase III on 11 March 2019. Currently, there is no new land development at PT GBSM. <p>The remediation project carried out by PT GBSM is a follow-up to the results of the LUCA (pass) study which was completed on August 8 2019, as an effort to restore the hydrological function of the peat ecosystem. Based on the results of the LUCA study, PT GBSM has an area to be remedied covering an area of 6,117.8 hectares which are planted in deep peat areas. The RSPO reviewers also recommended that the size of the remediation area should be reconfirmed using further delineations, referring to the company's semi-detailed maps. Based on the High Conservation Value and Social Impact Assessment there is no identification of loss of social HCV (HCV 5,6) related to the clearing of peat lands within the company's concessions.</p>		

#### 7.12.2

The company has identified the HCV listed in the High Conservation Value (HCV) Identification Report in the PT Gawi Bahandep Sawit Mekar area which was conducted in June 2013 in collaboration with the Faculty of Forestry IPB. The scope of the HCV study conducted is 19,594.22 Ha. Based on the results of the HCV study conducted, there were identified HCV areas of 470.07 Ha with HCV type 1.2; 1.3; 3; and 4.1.

The company also conducted an HCS assessment in 2016 by Bioref Center – Faculty of Forestry, IPB, the assessment covered an area of 19,594.22. Based on the report, the HCS area is 5.87 Ha. The company conducted HCS assessments, namely the September 2016 HCS Assessment by the Bioref Center - Faculty of Forestry IPB with the result that the HCS area was 5.87 Ha. then there was a revision in December 2016 there was a revision to the report where the identified HCS area was 531.80 Ha consisting of 470.07 Ha of HCV and 61.73 Ha of HCS.

Based on document verification, there was no new land clearing after 2018 by the company, so the company is not required to conduct an HCS study. Nonetheless, in November 2021 the company conducted an integrated HCV-HCS study conducted by PT Daemeter Consulting. Currently the report on the results of the HCV-HCS study is still in the process of being drafted by the consultant and will then be reviewed by the HCVRN because the scope of the HCV-HCS study apart from PT Gawi Bahandep Sawit Mekar also includes PT Mega Ika Khansa (Group TAP) which is not yet certified RSPO.

#### 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 company already has an HCV management and monitoring program for 2022-2023 based on the evaluation results of the previous period's realization of HCV management. The HCV program is for 2 years and will be evaluated every year. The program contains management plans, monitoring, timelines and the person in charge of implementation. The HCV management matrix explains that the management plan consists of:

- HCV area boundary marking
- Installation and maintenance of HCV area nameplates
- Land rehabilitation
- Counseling to employees
- Outreach to the community
- Monitoring flora and fauna
- Routine patrol of HCV area, flora and fauna

The company has also conducted a 5-year review of the management of High Conservation Value Areas which was conducted on February 21, 2022. This activity was carried out to analyze opportunities and challenges to the identified potential HCVs with the hope that they will become input for the next period's HCV management plan. The results of the review are used as a Master Plan for the management and monitoring of HCVs for the 2022-2026 period. This activity was carried out by involving stakeholders such as the surrounding village community and employees.

The integrated management plan has been developed in consultation with relevant stakeholders and includes both directly managed areas and broader and relevant landscape level considerations. This is evidenced by the company's HCV management plan which was developed by involving stakeholders such as the surrounding village community and employees. Management activities planned by the company also cover areas that are managed directly and take into account the wider landscape such as maintaining the presence of HCV (Sungai Bakung), anticipating land fires in the company area and in the area around the company, increasing employee and community knowledge by conducting HCV socialization.

The company can show several implementations of the HCV management and monitoring plans for the 2021-2022 period, for example:

- Monitoring of HCV Stake care which is carried out every month. For example, during the monitoring period of 7 September 2022, it was found that stakes were available and in good condition.

- The results of monitoring animals and plants for the first semester of 2022 show that there are 5 species of mammals, 37 species of birds, and 3 species of reptiles and amphibians. As for the types of flora there are 37 species.
- The HCV Signpost repair activities were carried out on June 16, 2022 in the Block F34 estate 2 area.
- The installation of conservation signs was carried out on 7 October 2022 in Blocks E34, G36, H36 and I49.
- Planting of Jelutung, Gelam, Mahang, and Belangiran forest plants in the conservation and remediation area on June 21, 2021.
- HCV socialization including the existence of animals to communities around villages such as Baung Village, Jahitan Village, and Muara Dua Village on January 27 2022 which was attended by 53 participants.
- Minutes of HCV socialization and important species held on 22 February 2022 which was attended by 39 employees.

### 7.12.5

Results of the verification documents, field visits and interviews with Baung Village and Jahitan Village obtained information that there are no areas of HCV-related and affect the local community.

### 7.12.6

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

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

- HCV socialization including the existence of animals to communities around villages such as Baung Village, Jahitan Village, and Muara Dua Village on January 27 2022 which was attended by 53 Participants.
- Minutes of HCV socialization and important species held on 22 February 2022 which was attended by 39 employees.

Based on the results of interviews with harvest and spray officials in Estates 1, 2 and 3, it is known that the company prohibits workers from raising protected animals and plants and is prohibited from catching, hunting and killing animals as well as destroying HCV areas.

### 7.12.7

Companies can show evaluation records for 2021. The results of the 2021 HCV and RTE species status monitoring evaluation carried out on February 2022 are:

- Data obtained from the field has not been used optimally to create a comprehensive wildlife monitoring database. The company's follow-up is to increase the knowledge and skills of the special officers tasked with managing HCV and monitoring important species, especially endangered species.
- Activities Marking HCV area boundaries and installing HCV area nameplates have been completed 100%. The next follow-up is to replace it if there are area boundaries and area nameplates that are damaged or lost.
- HCV area rehabilitation activities in 2021 have been carried out covering an area of 2 Ha. Follow up in the future by carrying out rehabilitation in other HCV areas.

Based on the results of the evaluation conducted, it is known that the implementation of HCV management is going well. The follow-up of the evaluation results is used as input for the management and monitoring of HCV areas in the next period. The results of interviews with the company's PIC, the results of the evaluation carried out will be used as input for the implementation of monitoring of HCV and RTE species for the next period.

### 7.12.8

There has been land clearing since November 2005 without prior HCV assessment by the company. therefore, the Remediation and Compensation Procedure applies to PT Gawi Bahandep Sawit Mekar. Companies can show their approval for PT Gawi Bahandep Sawit Mekar's remediation plan has been approved by RSPO via email from RSPO (rspocompensation@rspo.org) on September 25 2021 stating that PT Gawi Bahandep Sawit Mekar's remediation plan has officially been endorsed by the compensation panel. The RaCP process for PT GBSM is now completed and the following management units may proceed with certification.

Companies can show the implementation of PT Gawi Bahandep Sawit Mekar's Remediation plan for the 2022 period based on the time plan they have, such as:

- Conduct management and monitoring of peat water level which has also been reported through the peat groundwater level information system (SIMATAG) at the Ministry of Environment and Forestry.
- Installation of boundary markers for the river border area. The results of field observations in the Bakung River area show that there are boundary markers in the area which are adjacent to the planted area.
- Planting forest plants in degraded HCV areas. The company has planted forest plants with the types Jelutung, Mahang, Gelam, Belangiran, etc.
- Peat area subsidence monitoring.
- Land fire prevention & control by conducting outreach and training to the community. The company has established a Prosperous Fire Care Village (DMPA) in Baung Village, Stich Village and Muara Dua Village. In addition, the company also gives rewards to villages where there is no fire in one year (zero fire).

Based on the results of field observations in the remediation area of the Sungai Bakung block H38 Estate 2, it is known that the area has been planted with *Jelutung*, *Mahang*, *Gelam* and *Belangiran*. In addition, the area also has conservation markers and conservation area nameplates.

Status: Comply
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**3.2 Conformity Checklist of Certificate and Trademark Use**

<b>1.</b>	<b>Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client</b>	<b>X or ✓</b>
ASA-1.3	PT Gawi Bahandep Sawit Mekar did not use RSPO trademark and CB Logo.	✓
	Status: Comply	
<b>2.</b>	<b>Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use</b>	<b>X or ✓</b>
ASA-1.3	PT Gawi Bahandep Sawit Mekar did not use RSPO trademark and CB Logo.	✓
	Status: Comply	
<b>3.</b>	<b>Implementation of Certificate and Trademark is not used on product</b>	<b>X or ✓</b>
ASA-1.3	PT Gawi Bahandep Sawit Mekar did not use RSPO trademark and CB Logo.	✓
	Status: Comply	
<b>4.</b>	<b>Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.</b>	<b>X or ✓</b>
ASA-1.3	PT Gawi Bahandep Sawit Mekar did not use RSPO trademark and CB Logo.	✓
	Status: Comply	

### 3.3 Summary of RSPO Partial Certification.

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

PT Triputra Agro Persada Time Bound Plan (TBP) is explained in table 1.10. PT Triputra Agro Persada run eighteen (18) units in Indonesia. PT Triputra Agro Persada has informed the TBP, MUTU has considered that PT Triputra Agro Persada is comply with the RSPO requirement for TBP. The Time Bound Plan was declared by PT Triputra Agro Persada on October 2022.

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

MUTU Auditor has verified company partial certification and concludes that:

- There are no significant land conflicts which have not been declared below
- The company has followed RSPO requirement related to Remediation and Compensation Procedure, but not for New Planting Procedure. The company will follow the sanction from RSPO for area that has open after 1 January 2010 without NPP.
- There are no labour disputes that are not being resolved through an agreed process
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p><b>Company Group/Holding Statement:</b> PT TAP has conducted an internal audit for all uncertified unit.</p> <p><b>Auditor Verification:</b></p> <ol style="list-style-type: none"> <li>1. PT. Anugerah Agung Prima Abadi</li> <li>2. PT. Hanamas Jaya Abadi.</li> <li>3. PT. Etam Bersama Lestari.</li> <li>4. PT. Dwiwira Lestari Jaya</li> <li>5. PT. First Lamandau Timber International &amp; Hamparan Perkasa Mandiri.</li> <li>6. PT Kutim Agro Mandiri</li> <li>7. PT Pradana Telen Agromas</li> <li>8. PT Kedap Sayaaq Dua</li> <li>9. PT Genera Aura Semari</li> <li>10. PT Mega Ika Khansa</li> <li>11. PT Sukses Karya Mandiri</li> <li>12. PT Trieke Agro Nusantara</li> <li>13. PT Muaratoyu Subur Lestari</li> <li>14. PT Subur Abadi Wana Agung</li> <li>15. PT Natura Pasific Nusantara</li> <li>16. PT Yudha Wahana Abadi</li> </ol> <p>Triputra Agro Persada has conducted Internal Audit for units that are not yet certified. However, there is no information on the date of the audit activity and evidence that the Internal Audit document was signed by management.</p>
2.2.2	No replacement after dates defined in NIS Criterion 7.3 of: <ul style="list-style-type: none"> <li>• Primary forest.</li> </ul>	<p><b>Company Group/Holding Statement:</b> PT TAP has reported the disclosure of non-compliance land clearing to the RSPO through email on December 8, 2020.</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
	<ul style="list-style-type: none"> <li>Any area identified as containing High Conservation Values (HCVs).</li> <li>Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3.</li> </ul>	<p><b>Auditor Verification:</b></p> <ol style="list-style-type: none"> <li>PT MIK <ul style="list-style-type: none"> <li>HCV assessment conducted by Bioref Centre on October 2014.</li> <li>LUCA conducted by Fakultas Kehutanan IPB on June 2015.</li> </ul> </li> <li>PT MSL <ul style="list-style-type: none"> <li>HCV assessment conducted by Tim HCV Fakultas Kehutanan - IPB on February 2014</li> <li>LUCA conducted by Fakultas Kehutanan IPB on March 2015.</li> </ul> </li> <li>PT NPN <ul style="list-style-type: none"> <li>HCV assessment conducted by Tim HCV Fakultas Kehutanan - IPB on February 2014.</li> <li>LUCA still on progress</li> </ul> </li> <li>PT PTA <ul style="list-style-type: none"> <li>HCV assessment conducted by Bioref Centre on October 2014</li> <li>LUCA conducted by Fakultas Kehutanan IPB on June 2015.</li> </ul> </li> <li>PT SAWA <ul style="list-style-type: none"> <li>HCV assessment conducted by Bioref Centre on October 2014</li> <li>LUCA conducted by Fakultas Kehutanan IPB on June 2015.</li> </ul> </li> <li>PT SKM <ul style="list-style-type: none"> <li>HCV assessment conducted by Bioref Centre on October 2014</li> <li>LUCA conducted Fakultas Kehutanan IPB on June 2015.</li> </ul> </li> <li>PT TAN <ul style="list-style-type: none"> <li>HCV assessment conducted by Tim Fakultas Kehutanan IPB on March 2012</li> <li>LUCA conducted by Tim Fakultas Kehutanan IPB on June 2015.</li> </ul> </li> <li>PT YWA <ul style="list-style-type: none"> <li>HCV assessment conducted by Tim Fakultas Kehutanan IPB on March 2012</li> <li>LUCA conducted Tim Fakultas Kehutanan IPB on June 2015.</li> </ul> </li> <li>AAPA <ul style="list-style-type: none"> <li>HCV Assessment conducted by Bioref Center – Forestry Faculty of IPB on August 2014.</li> <li>LUCA conducted by Tim Fakultas Kehutanan IPB on 2016.</li> </ul> </li> <li>PT DLJ <ul style="list-style-type: none"> <li>HCV Assessment conducted by Tim Fakultas Kehutanan IPB on February 2014</li> <li>LUCA conducted by Tim Fakultas Kehutanan IPB on May 2016</li> </ul> </li> <li>PT EBL <ul style="list-style-type: none"> <li>HCV Assessment conducted by Tim Fakultas Kehutanan IPB on February 2014</li> <li>LUCA conducted by Tim Fakultas Kehutanan IPB on September 2016</li> </ul> </li> <li>PT GAS <ul style="list-style-type: none"> <li>HCV Assessment conducted by Tim Fakultas Kehutanan IPB on August 2016</li> <li>LUCA conducted by Tim Fakultas Kehutanan IPB on 2016</li> </ul> </li> <li>PT HJA <ul style="list-style-type: none"> <li>HCV yet to be done</li> </ul> </li> </ol>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> <li>• LUCA still on progress</li> </ul> <p>14. PT HPM</p> <ul style="list-style-type: none"> <li>• HCV Assessment conducted by Tim Fakultas Kehutanan IPB on June 2014</li> <li>• LUCA conducted by Tim Fakultas Kehutanan IPB on September 2016</li> </ul> <p>15. PT KAM</p> <ul style="list-style-type: none"> <li>• HCV Assessment conducted by Bioref Center – Forestry Faculty of IPB on December 2014</li> <li>• LUCA conducted by Fakultas Kehutanan IPB on December 2016</li> </ul> <p>16. PT KSD</p> <ul style="list-style-type: none"> <li>• HCV Assessment then conducted by Tim Fakultas Kehutanan IPB on June 2014</li> <li>• LUCA still on progress</li> </ul>
2.2.3	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<p><b>Company Group/Holding Statement:</b> All subsidiaries of TAP not conduct NPP for new planting since 1 January 2010.</p> <p><b>Auditor Verification:</b> Based on auditor verification 16 subsidiaries of TAP not conduct NPP and will be object as sanction, those unit consist of:</p> <ol style="list-style-type: none"> <li>1. PT MIK were planted in 2007 – 2015</li> <li>2. PT MSL were planted in 2007 – 2019</li> <li>3. PT NPN were planted in 2009 – 2016</li> <li>4. PT PTA were planted in 2012 – 2019</li> <li>5. PT SAWA were planted in 2011 – 2016</li> <li>6. PT SKM were planted in 2006 – 2019</li> <li>7. PT TAN were planted in 2012 – 2020</li> <li>8. PT YWA were planted in 2006 – 2012</li> <li>9. PT AAPA were planted in 2010 - 2019</li> <li>10. PT DLJ were planted in 2001 – 2010</li> <li>11. PT EBL were planted in 2000 – 2019</li> <li>12. PT GAS were planted in 2015 – 2016</li> <li>13. PT HJA were planted in 2005 – 2018</li> <li>14. PT KAM were planted in 2012 – 2013</li> <li>15. PT HPM were planted in 2008 – 2019</li> <li>16. PT KSD were planted in 2008 - 2012</li> </ol>
2.2.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p><b>Company Group/Holding Statement:</b> There are several land conflicts in some of subsidiary companies of PT TAP and the progress of conflict resolution has been documented. List of land conflict as follows.</p> <ul style="list-style-type: none"> <li>- 18 July 2019: Land conflict between Tanjung Jaya Abadi and PT Brahma Bina Bakti/PT Kirana Sekernan (conflict closed)</li> <li>- 27 April 2020: PT BBB was reported to the environment ministry for alleged encroachment of production forest (conflict closed).</li> <li>- 26 January 2018: Five oil palm companies, including PT BBB, are suspected of encroaching into forest areas in Batanghari (conflict closed).</li> <li>- November 2016: Six oil palm companies in Lamandau (including PT FLTI) are suspected of violating land cultivation permits (conflict closed).</li> </ul>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> <li>- 26 May 2015: Oil palm companies occupy the Customary Land of Dayak Modang. Company (including PT HPM) accused of confiscating customary land of Dayak Modang (Long Bentuq Village) (conflict closed).</li> <li>- 19 April 2013: Company (including PT SAWA) accused of confiscating customary land of Dayak Modang (Long Bentuq Village) (conflict closed).</li> </ul> <p>PT MIK: There are no land conflicts  PT NPN: There are no land conflicts  PT PTA: There are no land conflicts  PT TAN: There are no land conflicts</p> <p><b>Auditor Verification:</b></p> <ol style="list-style-type: none"> <li><b>PT Mega Ika Khansa</b>  SIA has conducted by Linkar Komunitas Sawit on 2014. SIA document informed that there is an issue related land claim as a negative impact of PT MIK's operations. → No information related land conflict on internet.</li> <li><b>PT Muaratoyu Subur Lestari</b>  SIA has conducted by Linkar Komunitas Sawit on 2014. SIA document informed that there is an issue related land claims as a negative impact of PT MSL's operations → No information related land conflict on internet.</li> <li><b>PT Natura Pasific Nusantara</b>  SIA has conducted by Linkar Komunitas Sawit on 2016. SIA document informed that there is an issue related land claim as a negative impact of PT NPN's operations. → No information related land conflict on internet.</li> <li><b>PT Pradana Telen Agromas</b>  The company has UKL-UPL documents that discuss the positive and negative impacts that may arise due to the company's operations, one of which is land conflicts → No information related land conflict on internet.</li> <li><b>PT Subur Abadi Wana Agung</b>  SIA has conducted by Linkar Komunitas Sawit on 2015. SIA document informed that there is an issue related land claim as a negative impact of PT SAWA's operations. → there is issue on website <a href="https://nasional.tempo.co/read/669597/perusahaan-sawit-duduki-tanah-adat-dayak-modang/full&amp;view=ok...">https://nasional.tempo.co/read/669597/perusahaan-sawit-duduki-tanah-adat-dayak-modang/full&amp;view=ok...</a> However, based on the website informed that there are customary land claims submitted from Long Bentuq village that think the company has evicted their customary land. The company has clarified through village forest verification. After verification of the village forest referred to by the community as customary forest which was determined based on the Decree of the Minister of Forestry number SK.184 / Menhut-II / 2012 dated April 18, 2012 with an area of 880 hectares, the area in question is outside the company's concession.</li> <li><b>PT Sukses Karya Mandiri</b>  SIA has conducted by Linkar Komunitas Sawit on 2015. SIA document informed that there is an issue related land claim as a negative impact of PT SAWA's operations. → there is issue on website <a href="https://saveourborneo.org/konflik-agraria-di-kalimantan-tengah/">https://saveourborneo.org/konflik-agraria-di-kalimantan-tengah/</a>. However, based on the website informed that The location within the company's permit turned out to be a transmigration area for Palih Baru village and there was a problem with the boundaries between Sukamara and Kutai Waringin Barat districts. The company has made settlement efforts until 2017, where the company has been mediated by the government and has offered various settlement solutions. However, the village</li> </ol>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>did not want to accept it. Current land conditions, 50 percent are managed by the community and 50% are managed by companies.</p> <p>7. <b>PT Trieka Agro Nusantara</b> SIA has conducted by Linkar Komunitas Sawit on 2013. SIA document informed that there is an issue related land claims as a negative impact of PT TAN's operations → No information related land conflict on internet.</p> <p>8. <b>PT Yudha Wahana Abadi</b> SIA has conducted by TIM HCV – SIA Fakultas Kehutanan IPB on 2014. SIA document informed that there is an issue related land conflict as a negative impact of PT YWA's operations. → No information related land conflict on internet.</p> <p>9. <b>PT Anugrah Agung Prima Abadi</b> SIA has conducted by TIM SIA Fakultas Kehutanan IPB on August 2014. Based on document SIA, there is no negative issue related to PT AAPA operational activities.</p> <p>10. <b>PT Dwiwira Lestari Jaya</b> SIA has conducted by Social Impact Department of Head Office Team of Triputra Agro Persada on August 2014. Based on document SIA, there is no negative issue related to land conflict in PT Dwiwira Lestari Jaya. There is an issue on website, summary as follows. <a href="https://berau.prokal.co/read/news/52377-geram-dengan-harapan-palsu.html">https://berau.prokal.co/read/news/52377-geram-dengan-harapan-palsu.html</a> informed that there was a community perception that the company planted outside its license and asked that the land be returned to Biatan Ilir Village. Company has informed the Biatan Ilir Village that the area is within the business plantation permit area.</p> <p>11. <b>PT Etam Bersama Lestari</b> SIA has conducted by Linkar Komunitas Sawit on March 2014. Based on document SIA, there are several social issues, such as decreasing of community land, complicated process of compensation payment → No information related land conflict on internet.</p> <p>12. <b>PT General Aura Semari</b> The company has UKL-UPL documents that discuss the positive and negative impacts that may arise due to the company's operations, one of which is land conflicts → No information related land conflict on internet.</p> <p>13. <b>PT Hanamas Jaya Abadi</b> The company has UKL-UPL documents that discuss the positive and negative impacts that may arise due to the company's operations, one of which is land conflicts → No information related land conflict on internet.</p> <p>14. <b>PT Hamparan Perkasa Mandiri</b> SIA has conducted by Linkar Komunitas Sawit on July 2015. Based on document SIA, informed that there is an issue related land conflict as a negative impact of PT YWA's operations.</p> <p>There is an issue on website, summary as follows. <a href="https://fwi.or.id/wp-content/uploads/2013/04/Final_laporan_Long-Bentuk_cetak_edyyo.pdf">https://fwi.or.id/wp-content/uploads/2013/04/Final_laporan_Long-Bentuk_cetak_edyyo.pdf</a> informed that there is a customary land claim submitted from the village of Long Bentuq who think the PT HPM has evicted their customary land. Company has clarified this issue and issued the clarification online on <a href="https://nasional.tempo.co/read/675248/pt-sawa-dan-pt-hpm-bantah-duduki-tanah-adat-dayak-modang">https://nasional.tempo.co/read/675248/pt-sawa-dan-pt-hpm-bantah-duduki-tanah-adat-dayak-modang</a>. Based on the article, it is informed that there is customary land claims submitted by the Long Bentuq</p>



2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>community who thought their customary land was included in the PT HPM and SAWA areas. After verification of the village forest referred to by the community as customary forest which was determined based on the Decree of the Minister of Forestry number SK.184 / Menhut-II / 2012 dated 18 April 2012 with an area of 880 hectares and is outside the company's concession.</p> <p>15. <b>PT Kutim Agro Mandiri</b> The company has ANDAL documents that discuss the positive and negative impacts that may arise due to the company's operations, one of which is land conflicts → No information related land conflict on internet.</p> <p>16. <b>PT Kedap Sayaq Dua</b> The company has ANDAL documents that discuss the positive and negative impacts that may arise due to the company's operations, one of which is land conflicts → No information related land conflict on internet.</p>
2.2.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p><b>Company Group/Holding Statement:</b> Related complaint mechanism of workers, the company already has SOP <i>Penyelesaian Keluhan Karyawan di Site</i> No. SOP/SUPP/XI/2016/009 dated May 27, 2019.</p> <p><b>Auditor Verification:</b> Based in information from public source and RSPO website informed:</p> <ol style="list-style-type: none"> <li>1. PT MIK → there is no labor dispute</li> <li>2. PT MSL → there is issue on website <a href="https://spn.or.id/sudah-2-tahun-gugatan-80-pekerja-pt-muaratoyu-subur-lestari-diteltantarkan/">https://spn.or.id/sudah-2-tahun-gugatan-80-pekerja-pt-muaratoyu-subur-lestari-diteltantarkan/</a>. However, based on the website informed that there are labor issues related work termination at PT MSL. The company has clarified through the decision of the Samarinda Industrial Relations Court which states that the work termination between the Plaintiffs and the Defendants are legal.</li> <li>3. PT NPN → there is no labor dispute</li> <li>4. PT PTA → there is no labor dispute</li> <li>5. PT SAWA → there is no labor dispute</li> <li>6. PT SKM → there is no labor dispute</li> <li>7. PT TAN → there is no labor dispute</li> <li>8. PT YWA → there is issue on website <a href="https://sbsinews.com/hampir-tiga-bulan-kesepakatan-antara-buruh-dengan-managemen-pt-yudha-wahana-abadi-belum-teralisasi/">https://sbsinews.com/hampir-tiga-bulan-kesepakatan-antara-buruh-dengan-managemen-pt-yudha-wahana-abadi-belum-teralisasi/</a> and <a href="https://www.beritamometer.com/polri-harus-beri-perlindungan-hukum-kepada-buruh-ntt-di-kaltim/">https://www.beritamometer.com/polri-harus-beri-perlindungan-hukum-kepada-buruh-ntt-di-kaltim/</a>. Several meetings / negotiations have been held to discuss and explain the status of the company which is facilitated by the supervision department of the Manpower Agency and the Manpower Agency after monitoring and assessing this case they convey that the Company's actions have complied with the applicable laws. It was explained by the Manpower Agency that in case the labor union requires a permanent and binding decision, the labor union must register the case with Industrial Relations Court. However, until now, labor union has not entered into the realm of law, meaning that it has not been registered as a labor legal process or registered with Industrial Relations Court.</li> <li>9. PT AAPA → there is no labor dispute</li> <li>10. PT DLJ → there is no labor dispute</li> <li>11. PT EBL → there is no labor dispute</li> <li>12. PT GAS → there is no labor dispute</li> <li>13. PT HJA → there is no labor dispute</li> <li>14. PT HPM → there is no labor dispute</li> </ol>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		15. PT KAM → there is no labor dispute 16. PT KSD → there is no labor dispute
2.2.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p><b>Company Group/Holding Statement:</b> The company has a mechanism to evaluate compliance with regulations.</p> <p><b>Auditor Verification:</b></p> <ol style="list-style-type: none"> <li>PT Mega Ika Khansa (MIK)             <ul style="list-style-type: none"> <li>Location permit based on Decree of Seruyan Regent No. 50 year 2007 on March 28 2007 for an area of ± 6.000 Ha.</li> <li>Extension of the Location Permit based on the Seruyan Regent Decree No. 188.45 / 388/2014 dated 1 December 2014 covering an area of ± 4,843.2 Ha.</li> <li>Area Release Permit based on the Decree of the Minister of Forestry of the Republic of Indonesia No. SK.815 / menhut-II / 2014 dated 25 September 2014 covering an area of 1,799.66 hectares.</li> <li>Plantation Business Permit for Cultivation (IUP-B) based on the Seruyan Regent Decree No. 188.45 / 297/2020 dated 8 July 2020 for an area of ± 2,617.08 Ha.HGU → on process.</li> </ul> </li> <li>PT Muaratoyu Subur Lestari             <ul style="list-style-type: none"> <li>Location Permit based on document No. 460.I / 153 / BPN-44.4 dated 15 August 2005 for an area of ± 12,000 Ha.</li> <li>IUP based on the Decree of the Regent of Paser No. 525/0 / Ek.Adm.SDA / IX / 2013 dated 24 September 2013 for an area of ± 12,000 Ha and a processing capacity of 60 tons of FFB / hour.</li> <li>HGU Certificate No. 32 dated 10 December 2009 covering an area of 11,254.9 hectares and valid until 8 September 2044.</li> </ul> </li> <li>PT Natura Pasific Nusantara             <ul style="list-style-type: none"> <li>Location Permit based on the Decree of the Regent of Berau No. 161 of 2007 dated 1 May 2007 for an area of ± 5,090 Ha.</li> <li>IUP based on the Decree of the Regent of Berau No. 713 of 2015 dated 11 September 2015 for an area of ± 4,221 hectares and a processing capacity of 30 tons of FFB / hour.</li> <li>HGU Certificate No. 26 dated 1 September 2008 covering an area of 1,640.27 hectares and valid until 27 July 2043.</li> </ul> </li> <li>PT Pradana Telen Agromas             <ul style="list-style-type: none"> <li>Location Permit based on Kutai Timur Regent Decree No. 525.26 / K.771 / HK / XII / 2011 dated 27 September 2011 for an area of ± 2.685 Ha.</li> <li>IUP based on Kutai Timur Regent Decree No. 188.4.45 / 069 / Eko.1-VIII / 2011 dated 18 August 2011 for an area of ± 2.685 Ha.</li> </ul> </li> <li>PT Subur Abadi Wana Agung             <ul style="list-style-type: none"> <li>Location Permit based on Kutai Timur Regent Decree No. 22 / 02.188.45 / HK / I / 2006 dated 18 January 2006 for an area of ± 14,350 Ha.</li> <li>IUP based on Kutai Timur Regent Decree No. 500/054 / EK-II / 2006 dated 7 February 2006 for an area of ± 14,350 Ha</li> <li>8. BPN Decree No. 12 / HGU / BPN RI / 2011 dated 7 March 2011 for a land area of 7,343.43 hectares.</li> </ul> </li> <li>PT Sukses Karya Mandiri             <ul style="list-style-type: none"> <li>Location Permit was issued by the OSS system on 4 September 2018 for an area of 14,580 Ha.</li> </ul> </li> </ol>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> <li>- IUP based on the Decree of the Regent of Sukamara No. 99 of 2005 dated 9 August 2005 for an area of <math>\pm</math> 14,600 Ha and a capacity of 30 tons of FFB / hour.</li> <li>- BPN Decree No. 113 / HGU / KEM-ATR / BPN / 2017 dated 3 November 2017 for a land area of 6,666,8652 Ha.</li> </ul>
		<p>7. PT Trieka Agro Nusantara</p> <ul style="list-style-type: none"> <li>- Location Permit in accordance with the Decree of the Regent of Lamandau No. Ek.525.26 / 03 / SK-IL / VI / 2014 dated 30 June 2014 for an area of 4,765.65 Ha.</li> <li>- IUP No. 503.6 / 27 / X / DPMPTSP-2020 dated 19 October 2020 for an area of <math>\pm</math> 3,614 Ha.</li> <li>- BPN Decree No. 65 / HGU / KEM-ATR / BPN / 2016 dated 7 October 2016 for a land area of 3,640.47 Ha.</li> </ul>
		<p>8. PT Yudha Wahana Abadi</p> <ul style="list-style-type: none"> <li>- Location Permit in accordance with the Decree of the Regent of Berau No. 305 of 2004 dated 13 December 2004 for an area of 10,000 Ha.</li> <li>- IUP-B No. 295 of 2005 dated 4 October 2005 for an area of <math>\pm</math> 9,120 Ha and IUP-P No. 278 of 2012 dated 22 May 2012 for a capacity of 60 tons of FFB / hour covering an area of 30 ha.</li> <li>- BPN Decree No. 65-HGU-BPN RI-2007 dated 14 December 2007 for a land area of 8,782.940 hectares.</li> </ul>
		<p>9. PT Anugrah Agung Prima Abadi.</p> <ul style="list-style-type: none"> <li>- Location permit in accordance with Decree of Berau Regent No. 124/2008 issued on 25 March 2008 for area of <math>\pm</math> 10,000 Ha.</li> <li>- Plantation business permit from Regent Of Berau based on Decree No. 158/2007 issued on 24 April 2007. The areal coverage for Business Plantation Permit is <math>\pm</math>8.410 Ha. Company showed the Recommendation Letter from One Stop Services and Investment Service Kalimantan Timur Province issued on 25 January 2019 about Recommendations on conformity with plantation development planning for Plantation Business Permit- Processing of PT AAPA. It stated that in principle, provides recommendations for Plantation Business Permits for processing palm oil products with a capacity of 60 tons of FFB / hour</li> <li>- Land use rights (HGU) decree No. 27/HGU/BPN RI/2010 issued on 11 May 2020 covering 7,064.16 Ha</li> </ul>
		<p>10. PT Dwiwira Lestari Jaya</p> <ul style="list-style-type: none"> <li>- Location permit in accordance with Decree of Berau Regent No. 570/05/T.PEM.A/1999 issued on 11 August 1999 for area of <math>\pm</math> 20,000 Ha</li> <li>- Plantation business permit No. 777/Menhutbun-II/2000 issued on 29 June 2000 with coverage area 12,000 Ha with 1 unit palm oil mill with processing capacity 60 ton FFB/hour from Ministry of Forestry and Plantation of Republic of Indonesia.</li> <li>- Land use rights (HGU) decree No. 149/HGU/BPN RI/2009 issued on 27 October 2009 with coverage area 11,983 Ha, described in 6 plot maps. The land use rights is valid for 35 years.</li> </ul>
		<p>11. PT Etam Bersama Lestari</p> <ul style="list-style-type: none"> <li>- Location permit in accordance with Decree of Kutai Timur Regent No. 114/02.188.45/HK/IV/2004 issued on 7 April 2004 for area of <math>\pm</math> 15,000 Ha</li> <li>- Plantation business permit in accordance with letter No. 775/Menhutbun-II/2000 issued on 29 June 2000 with coverage area 10,000 Ha and 1 unit</li> </ul>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>palm oil mill with processing capacity 45 ton FFB/hour from Ministry of Forestry and Plantation of Republic of Indonesia.</p> <ul style="list-style-type: none"> <li>- Land use rights (HGU) decree No. 151/HGU/BPN RI/2009 issued on 12 November 2009 with coverage area 9,977.70 Ha. The certificate of this HGU is No. 89 for area of 9,977.70 Ha and valid until 11 November 2044.</li> </ul> <p>12. PT Genera Aura Semari</p> <ul style="list-style-type: none"> <li>- Location permit in accordance with Decree of Berau Regent No. 742/2014 about extension of Location Permit issued on 31 October 2014 for area of <math>\pm 2,990</math> Ha.</li> <li>- Plantation business permit in accordance with Decree Letter of Berau Regent No. 489/2016 issued on 30 June 2016 with coverage area <math>\pm 2,990</math> Ha.</li> <li>- Land Use Rights for PT GAS is not issued yet and still in progress of issuance. Company showed documentation of Resume of Committee B Hearing for area of 2,251.57 Ha of PT General Aura Semari on 8 June 2016.</li> </ul> <p>13. PT Hanamas Jaya Abadi</p> <ul style="list-style-type: none"> <li>- Company has two location permits, as follows: According to Decree of Lamandau Regent No. EK.525.26/02/II/2007 about Location Permit for PT First Lamandau Timber International issued on 27 January 2007. This decree explains that PT First Lamandau Timber International which already has location permit according to Decree of Lamandau Regent No. EK.525.26/01/VI/2006 has changed name into PT Hanamas Jaya Abadi with coverage area <math>\pm 3,000</math> Ha. According to Decree of Lamandau Regent No. 503.5/05/IL/IX/BPPTPM-2015 about Location Permit for PT Hanamas Jaya Abadi with coverage area <math>\pm 1,480.10</math> Ha issued on 7 September 2015.</li> <li>- Plantation business permit according to Decree of Lamandau Regent No. EK.525.26/07/SK.IUP/IX/2007 about plantation business permit for PT Hanamas Jaya Abadi issued on 25 September 2007 for coverage area 3,000 Ha and processing capacity 30 tonnes/hour.</li> <li>- PT HJA does not have land use rights yet.</li> </ul> <p>14. PT Kutim Agro Mandiri</p> <ul style="list-style-type: none"> <li>- Location permit in accordance with Decree Letter of Kutai Timur Regent No. 525.26/K.145/HK/111/2011 about Location Permit for PT Kutim Agro Mandiri for coverage area <math>\pm 7,515</math> Ha issued on 15 March 2011. This permit has 3 times extended. The latest extension of Location permit is in accordance with Decree of Kutai Timur Regent No. 535.26/K.377/HK/VI/2015 about Extension of Location Permit of PT Kutim Agro Mandiri for about <math>\pm 7,192</math> Ha issued on 10 June 2015.</li> <li>- Plantation business permit according to Decree of Kutai Timur Regent No. 188.4.45/070/Eko.1-VIII/2011 about plantation business permit for PT Kutim Agro Mandiri issued on 18 August 2011 for coverage area <math>\pm 7,515</math> Ha.</li> <li>- PT KAM does not have land use rights yet.</li> </ul> <p>15. PT Hamparan Perkasa Mandiri</p> <ul style="list-style-type: none"> <li>- Location permit in accordance with Decree Letter of Kutai Timur Regent No. 27/02.188.4.5/HK/II/2006 about Location Permit for PT Hamparan Perkasa Mandiri for coverage area <math>\pm 12,180</math> Ha issued on 19 January 2006. This permit has been extended and the extension of Location permit is in accordance with Decree of Kutai Timur Regent No. 188.4.45/7/HK/II/2008</li> </ul>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>about Extension of Location Permit of PT Hamparan Perkasa Mandiri for about ±11,880 Ha issued on 9 January 2008.</p> <ul style="list-style-type: none"> <li>- Plantation business permit according to Decree of Kutai Timur Regent No. 188.4.45/152/Eko.1-IX/2014 about plantation business permit for PT Hamparan Perkasa Mandiri issued on 17 September 2014 for coverage area ±8,174.388 Ha.</li> <li>- Land use rights in accordance with Decree of Land National Head of Republic of Indonesia No. 106/HGU/BPN RI/2009 about Land Use Rights for PT Hamparan Perkasa Mandiri for coverage area 8,174.388 Ha issued on 7 September 2009.</li> </ul> <p>16. PT Kedap Sayaaq Dua</p> <ul style="list-style-type: none"> <li>- Location permit in accordance with Decree Letter of Kutai Barat Regent No. 520/K.719/2009 about Location Permit for PT Kedap Sayaaq for coverage area ±20,000 Ha issued on 9 March 2000. This permit has been extended 2 times and the latest extension of Location permit is in accordance with Decree of Kutai Barat Regent No. 525.26/K.1077/2007 about Extension of Location Permit of PT Kedap Sayaaq Dua for about ±17,940 Ha issued on 19 December 2007.</li> <li>- Plantation business permit according to Decree of Kutai Timur Regent No. 503/815/Sosek-TU.P/VI/2005 about plantation business permit for PT Kedap Sayaaq Dua issued on 29 June 2005 for coverage area ±20,000 Ha. Company then showed letter from Investment and One Stop Services Agency of Kutai Barat Regency No. 525.26/31/DPMPSTP-III.SP/VI/2020 on 16 June 2020 which stated that agreed the Plantation Business Permit 6<sup>th</sup> Revision with business registration number 8120111270551 for about ±4,052.84 Ha</li> <li>- Land use rights in accordance with Decree of Land National Head of Republic of Indonesia No. 103/HGU/BPN RI/2010 about Land Use Rights for PT Kedap Sayaaq Dua for coverage area 5,905.78 Ha issued on 29 December 2010, described in 6 plot maps. The land use rights are valid for 35 years.</li> </ul>

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

#### 3.4.1. Identification of Findings, Corrective Actions and Observations at ASA-1.2 Audit

NCR No.	:		Issued by	:	
Date Issued	:		Time Limit	:	
NC Grade	:		Date of Closing	:	
Standard Ref. & Requirement	:				
Evidence observed (filled by auditor): There was no non conformity found in ASA-1.2 Audit					
Non-Conformance Description (filled by auditor):					
Root Cause Analysis (filled by organization audited):					
Correction (filled by organization audited):					
Corrective Action (filled by organization audited):					
Assessor Evaluation and Conclusion (filled by auditor):					
Verified by	:				



**3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-1.3 Audit**

NCR No.	:	2022.01	Issued by	:	Sentot Adi Subandono
Date Issued	:	November 11, 2022	Time Limit	:	09 February 2023
NC Grade	:	Major	Date of Closing	:	09 February 2023
Standard Ref. & Requirement	:	2.1.1 The unit of certification complies to relevant regulations.			

Evidence observed (filled by auditor):

**Boiler Operator**

- Permenaker No. 01 of 1988, in Appendix 1 it is explained that for a steam boiler capacity >20 T/h - <40 T/h requires 1 class I operator and 1 class II operator for each shift.
- The results of field observations at GBSM Mill show that the company has a boiler with a capacity of 40 tons/hour. It is known that the Boiler Operator works 2 shifts.
- Based on document review and interviews, it is known that there are:
  - 1 operator with the initial S who already has a K3 Class 1 Boiler Operator License.
  - 2 Operators with the initials AJ and AT who have passed and are competent to take the Class 1 and 2 Boiler Operator certification, and have been shown a certificate from PJK3 TPM with number 1439/SK/VIII/2022 dated August 24, 2022 that the Certificate and License are current currently being processed at the Ministry of Manpower, so currently there is still a shortage of 1 K3 class 2 license operator.

**Power House Operator**

- Permenaker No. 38 of 2016 in Articles 110, 111 and Table E it is explained that for prime movers with power > 214.47 HP must have one person each for class I and class II power and production aircraft operators.
- The results of field observations of GBSM show that the company has a turbine engine with a capacity of 1,800 KW/2,413 HP. It is known that the Engine Room Operator works 3 shifts.
- The results of a study on the list of OHS license operators, it is known that there is 1 engine room operator with the initials JW who already has an OHS license of Power and Production Aircraft with a validity period of up to 30 May 2023 so there is still a shortage of 2 licensed operators for the next shift.

**Heavy Equipment Operator**

- Permenaker No. 8 of 2020 on operator qualifications it states "heavy equipment such as excavators, loaders, tractors, graders. Dozers, roller/vibrator compactors have K3 license operators.
- Based on the review of the master list document on the legality of operators holding OHS licenses, it was found that there were 17 operators who already had OHS heavy equipment Licenses. It has also shown a statement letter from PJK3 TPM with number 1445/SK/VIII/2022 dated 24 August 2022 that Certificates and Licenses are currently being processed at the Ministry of Manpower as many as 5 pieces.
- The results of a review of Heavy Equipment documents (Tractors, Graders, Excavators, vibrators, and compactors), found that there were 77 aircraft-type heavy equipment in the company. So that currently there is still a shortage of OHS license operators as many as 55 operators.
- The company shows plans to submit K3 Operator certification and licenses for 41 people during the 2021 – 2022 period.

**GBSM OHS Committee**

- Regulation of the Minister of Manpower number 4 of 1987 concerning OHS Committee and the procedure for appointing OHS Expert states that the secretary of OHS Committee is the OHS Expert of the company concerned and OHS Committee is determined by the Minister or an appointed official.
- The company showed the Decree of the Central Kalimantan Province Manpower and Transmigration Office number 566/110/PK.12/II/Nakertrans dated 09 February 2022 concerning the Decree to Approval of GBSM OHS Committee with the secretary of OHS Committee with the initials OAT, but the results of interviews with the Manager of GBSM, it is known that OAT

has resigned in mid-July 2022. Currently the OHS Committee secretary is carried out by workers with the initials GY, who do not yet have a General OHS Expert license and do not yet have a letter of appointment authorization from the Minister/official appointed as an OHS Expert at GBSM, and have not yet received a Structure Decree The latest OHS Committee from the related service.

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

Based on this evidence, it is known that the company has not been able to show sufficient evidence:

1. Boiler Operators in accordance with *Permenaker* No. 01 of 1988.
2. Power House Operators in accordance with *Permenaker* No. 38 of 2016.
3. Heavy equipment Operators in accordance with *Permenaker* No. 8 of 2020.
4. GBSM's General OHS Expert who has a Letter of Authority and Appointment as the company's General OHS Expert in accordance with Minister of Manpower Regulation number 4 of 1987.

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

1. Because there is a class 1 certified boiler operator employee who is transferred/mutated to another station so that there is a shortage of 1 licensed operator
2. The company had planned generator operator training based on the *Permenaker*, but due to obtaining *SLO* licenses for generators, operator certification from the Ministry of Energy and Mineral Resources was required, so the initial training plan was canceled and changed to ESDM training with a postponed schedule.
3. There was the addition of new heavy equipment that were used as mechanization began to be implemented in operational activities.
4. A replacement OHS committee secretary has been planned for general OHS expert training but has not yet been implemented because the completeness of the training administration (diploma) has not been fulfilled and the schedule conformity with the training organizers.

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

1. Transfer the licensed operator back to the boiler station
2. Conducting Engine Operator Training Room for 2 operators
3. Conduct heavy equipment Operator Training (*PAA*)
4. Carry out General OHS expert Training

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

1. Monitoring and ensuring the fulfillment of operator licenses and those in charge of OHS in each area.
2. Conduct regular internal audits

**Assessor Evaluation and Conclusion (filled by auditor):**
**Auditor Verification January 16, 2023**

- Root cause analysis is an explanation that causes a non-conformity to occur. The root cause analysis shown does not explain this, please identify it again.
  - Corrective actions
    - What is shown for corrective action is more appropriate as correction. Please move.
    - Corrective action is a corrective action plan based on root cause analysis, so that the discrepancy does not occur again in the future. Please identify again.
  - The company also sends proof of improvement of worker transfer with the initials A.S from Sorting to Boiler, and Class 1 Boiler Operator OHS License which is still valid until December 31, 2026. Please inform the progress of the license a.n AJ and AT, if any. Based on this, the needs at the Boiler station have been fulfilled, and will be observed again in the next audit.
  - Not yet shown proof of compliance for power and production aircraft, lift and carry aircraft, and P2K3 secretary.
- Based on the evidence shown and the auditor's verification, the discrepancies were declared unfulfilled.

**Auditor Verification 30 January 2023**

- The root cause analysis has been received; however, it has not been shown that the PIC understands this matter and monitors the adequacy of licensed operators in the company. - The PIC already understands this, namely the Sustainability staff
- Correction, verification as follows:
  - Correction number 1 "Conducting Class 2 Operator Training to complete deficiencies", not specifically indicated for which

station. If what is meant is for the Boiler station, then corrective action number 1 "Moving the licensed operator back to the boiler station" is sufficient. Please move to correction and show the evidence.

- Corrections number 2, 3, and 4 have been accepted.

- Evidence of correction improvement:

- The generator operator OHS application form refers to the Minister of Energy and Mineral Resources Regulation No. 12 of 2021. ok
- General generator operator, PAA, and OHS expert training submission forms are still internal submissions, proof of registration and implementation plan/implementation plan by PJK3 in cooperation with the company has not been shown. – Attached is the proof of training document from the organizer (PJK3)

Please show proof of improvement in accordance with the Auditor's verification above.

- Corrective actions

- What is shown for corrective action is more appropriate as correction. Please move. – has been moved according to the input of the first review
- Corrective action is a corrective action plan based on root cause analysis, so that the discrepancy does not occur again in the future. Please identify again.

Based on the evidence shown and the auditor's verification, the discrepancies were declared unfulfilled.

### Auditor Verification 09 February 2023

The company has made acceptable corrections and corrective actions. The company also shows evidence of the following improvements:

- Planned Document for Fulfillment of heavy equipment Operator Certification which was approved by GM Area on 02 January 2023, for 55 Operators during February to October 2023.
- Statement letter number 57. Ket/DL.06/BPE/2023 dated 8 February 2023 issued by the Human Resources, Energy and Mineral Resources Development Agency for Electricity, New, Renewable Energy and Energy Conservation PPSDM which explains that participants with the initials HP and TD from PT TAP have attended PLTD and PLTU training and certification organized by PPSDM.
- PT Tranindo Pratama Mulia's PJK3 certificate number 193/SK/TPM/II/2023 concerning the registration of 24 PT GBSM workers with the position of PAA operator to take part in Kemner Certified Heavy Equipment Operator training from 20 to 23 February 2023.
- PT Lima Prima Solusindo's PJK3 certificate number 09.731/LPS/MBA/II/2003 regarding the implementation of training and general OHS expert certification for employees of PT GBSM with the initials GY on 30 January to 11 February 2023.
- Report on the implementation of training on aspects of safety, safety riding and HIRARC on 15 November 2022 and 28 December 2022 to Operators and Drivers in the company.

Based on the evidence shown and the auditor's verification, the discrepancy is declared to have been **fulfilled** and will be observed again in the next audit.

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

Verified by : Sentot Adi Subandono

NCR No.	:	2022.02	Issued by	:	Hasiholan Sihombing
Date Issued	:	11 November 2022	Time Limit	:	Next Surveillance
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	6.2.7 Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.			
Evidence observed (filled by auditor):					

- Based on the field observation and the interview with the harvesting workers in Division OC Estate 1, it's known that there's still contract workers in harvesting.
- Based on the document review of workers' data list in Estate 1, Estate 2, and Estate 3 period of October 2022, it's known that UoC had 2,395 workers (1,356 permanent workers and 964 contract workers). Then by the 964 contract workers, the harvesting contract workers were as follows:
  - Contract workers in harvesting of Estate 1 were 186 workers.
  - Contract workers in harvesting of Estate 2 were 189 workers.
  - Contract workers in harvesting of Estate 3 were 122 workers.
- Harvesting work including one of the core work/permanent work, referred to the description of permanent work in Law No. 13 of 2003 (explanation of article 59 paragraph 2) stated that the permanent work is continuous, uninterrupted, not limited in time and a part of production process in a company or unseasonal work.
- Government Regulation No. 35 of 2021 in the contract worker (PKWT) section explained that contract worker (PKWT) cannot be held for permanent work and contract worker can be held based on a period of time (work that doesn't take too long to complete, seasonal work, work related to new products) or the completion of a certain job (work that once completed and work that is temporary).

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

UoC hasn't been able to show enough evidence that the regulations related then contract workers has complied (Government Regulation No. 35 of 2021 and Law No. 13 of 2003) specifically related to the types of work that can be employed for contract workers.

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

There were still contract workers in harvesting due to several reasons, as follows:

- Recruited workers were inexperienced and new to oil palm plantations.
- Due to inexperience, it takes a longer evaluation time to become a standard harvester.
- Evaluation is carried out every 3 months with minimum attendance and productivity assessment parameters. If the worker meet these parameters, they can be appointed as a permanent worker without having to wait for the contract to expire.

**Auditor Response (30.01.23):**

The third point isn't relevant as a root cause.

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

Make a timeline for the appointment from KK (contract worker) to KT (permanent worker)

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

- Conduct certain training for new harvesters
- Conduct 3 months evaluation after training
- Carry out appointments of PKWT employees in stages

**Assessor Evaluation and Conclusion (filled by auditor):**
**Auditor Verification on 18 January 2023**

There were still auditor questions in the root cause analysis and corrective action. In addition, there has been no evidence of improvement of this non-conformity. Based on the explanation above, the non-conformity isn't complied yet.

**Auditor Verification on 29 January 2023**

UoC showed the evidence of corrective action and correction as follows:

- The record of PT GBSM harvest training at OQ Division in Estate 3 on 28 December 2022 to 3 January 2023 which was attended by 6 harvest workers.
- Timeline for the planned appointment of harvest employees from KK (Contract Workers) to KT (Permanent Workers) from November 2022 to August 2023. The document explains that the company has planned appointments in each Estate for all contract workers left, as follows:
  - Harvesting workers in Estate 1 are 186 workers.

- b) Harvesting workers in Estate 2 are 189 workers.
- c) Harvesting workers in Estate 3 are 122 workers.
- Monitoring the appointment of contract employees to become permanent employees in November 2022, December 2022 and January 2023 for each estate. The document informs the appointment plan and actual appointment, namely as follows:
  - a) Harvesting workers in Estate 1 in November 2022 are planned to appoint 20 contract workers while the realization was 10 workers, December 2022 appointment for 19 temporary workers while the realization was 0 workers, and January 2023 appointment for 17 temporary workers while the realization was 6 workers.
  - b) Harvesting workers in Estate 2 in November 2022 are planned for the appointment of 19 workers while the realization was 0 workers, December 2022 appointments for 23 workers while the realization was 6 workers, and January 2023 appointments for 19 workers while the realization was 0 workers.
  - c) Harvesting workers in Estate 3 in November 2022 are planned to appoint 15 workers while the realization was 4 workers, December 2022 appointment for 16 workers while the realization was 16 workers, and January 2023 appointment for 15 workers while the realization was 3 workers.
- Personnel Change Notice/ Appointment of Permanent Employees harvest workers on behalf of UR (initials) on 1 November 2022 which was approved by the General Manager.
- Personnel Change Notice / Appointment of Permanent Employees on behalf of SPM harvest workers (initials) on 1 November 2022 which was approved by the General Manager.

However, the company has not explained/demonstrated the justification yet regarding the actual appointments in November and December 2022 and January 2023 which have not fulfilled the number of planned appointments which have been determined. Please the company show related evidence and respond to the auditor's response on the root cause analysis.

Based on the description above, the non-conformity isn't complied yet.

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

**Verified by** : **Mia Rahmah Qadryani/Hasiholan Sihombing.**

NCR No.	:	2022.03	Issued by	:	Sentot Adi Subandono
Date Issued	:	November 11, 2022	Time Limit	:	09 February 2023
NC Grade	:	Major	Date of Closing	:	January 30, 2023
Standard Ref. & Requirement	:	6.7.3 Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.			
Evidence observed (filled by auditor):					
PPE use The company shows the PPE Technical Procedure, with the code PT/SUPP/VI/2017/019 which takes effect from 01 January 2019. This guide regulates, among other things, the provision of relevant PPE for employees and guests by the company, the use of PPE, inspection and supervision of the use of PPE by each supervisor, maintenance and replacement of PPE. This procedure also regulates:					
<ul style="list-style-type: none"><li>• Harvester PPE including wearing a face shield while working.</li><li>• PPE for fertilizer workers and foremen including wearing goggles, dust filter masks (cartridges), cloth and leather gloves, aprons and boots).</li><li>• PPE for transporting fruit, including using a safety helmet.</li></ul>					

From the results of field observations, it is known that there is still use of PPE that is not in accordance with PPE procedures and related regulations owned by the company, as follows:

- Harvesters in Block I25 Division OH Estate 1 do not use face shields when working.
- Fertilizing Block J24 Division OH Estate 1 wearing a hat and sneakers when supervising fertilizer work. There are also fertilizer workers who do not wear masks while working.
- It was found that the FFB was transported using a grabber in Block F15 Division OC Estate 1. It was found that the operator did not wear a safety helmet while working.
- There was 1 FFB transport truck driver who did not wear leg protectors (barefoot) and 2 FFB transport truck drivers who used sandals at the PKS security post even though there was an announcement from the Mill Manager on September 19 2022 attached to the security post which informed that all truck drivers TBS must wear PPE safety helmet and shoes.

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

Based on this evidence, it is known that there are still workers in the plantations as well as FFB transport truck drivers who do not use PPE in accordance with company procedures and regulations.

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

There are harvesting, fertilizer, operator and driver employees who do not use complete PPE in accordance with PPE Technical Procedure No. PT/SUPP/VI/2017/019 due to lack of discipline in using PPE while working, and understanding of the risks of danger if not using PPE properly weak and has not been strictly enforced.

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

1. Evaluate the safety patrol findings regarding employees not using PPE
2. Carry out employee PPE checks every day before the start of work activities.
3. Conduct outreach to employees & drivers
4. Repair of PPE Signboards according to work in strategic places

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

1. Conducting re-socialization related to the discipline of using PPE & understanding the risks of danger that arise if you don't use PPE properly
2. Carry out employee PPE checks every day before the start of work activities
3. Imposing sanctions if you commit a violation

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

#### Auditor Verification January 18, 2023

- Root cause analysis is an explanation that causes a non-conformity to occur. The root cause analysis shown does not explain this, please identify it again.
- Corrections
- The planned correction has been acceptable, but the correction plan has not been shown related to the results of field observations such as whether the harvester does not use the face shield because it does not have it/is damaged/lost/has not been given/because it feels uncomfortable and complains while working so it needs to be re-evaluated in risk control efforts work, etc. Please identify this also in the correction plan. Next, please show proof of correction.
- Corrective actions
  - Corrective action is a corrective action plan based on root cause analysis, so that the discrepancy does not occur again in the future. Please identify again. Analysis of the root of the problem and then becomes the basis for identifying corrective action.
- The company shows evidence of improvement, as follows
  - Monitoring the checking of PPE and work tools for daily drivers, November 2022 for 25 drivers.
  - Minutes of the installation of OHS signs in the PT GBSM area at employee apple points, strategic places. Documentation update dated January 09, 2023.
  - TAP Group training implementation report dated December 28, 2022 regarding hazard identification, risk assessment, and safety riding for 16 drivers.

Based on the evidence shown and the auditor's verification, the discrepancies were declared unfulfilled.

#### Auditor Verification 30 January 2023

- Root cause analysis received.



- Correction has been accepted
- Corrective action has been received
- Evidence of improvement has been shown:
  - OHS training report - Use of PPE for employees Workshop on November 15, 2022, which was attended by Foremen, Operators, Drivers, and Helpers.
  - OHS training report - Use of PPE for Workshop employees at Estate 1 on 15 November 2022, which was attended by Assistants, Mechanics, Drivers, FS Operators, and Quick(grabber) Operators.
  - OHS training report - Use of PPE and management of LB3 inner fertilizer for Fertilizer employees in Division OH on 16 December 2022.
  - Monitoring the checking of PPE 1 Operator Grabber Division OFG in January 2023.
  - Monitoring of checking Harvesting PPE for 33 OFG Division Harvesters in January 2023.
  - Monitoring Fertilizer PPE checking for 9 OFG Division Fertilizers in January 2023.
  - Monitoring the checking of PPE 2 for Grabber Division OC Operators in November 2022, December 2022 and January 2023.
  - Monitoring of checking Harvest PPE for 15 OH Division Harvesters in November 2022.
  - Monitoring of Manuring PPE checks for 6 workers Division OH months November 2022, December 2022 and January 2023.
  - Socialization of HSE and IBPR (Hazard Identification and Risk Assessment) OQ Division on 4 November 2022 which was attended by Foremen, Krani, harvesters, and sprayers.
  - Socialization of HSE and IBPR (Hazard Identification and Risk Assessment) Division OT on 16 November 2022 which was attended by FFB harvesters, maintenance and loading and unloading workers.
  - Socialization of HSE and IBPR (Hazard Identification and Risk Assessment) Division OYZ on 21 November 2022 which was attended by harvesters and maintenance.
  - Socialization of HSE and IBPR (Hazard Identification and Risk Assessment) Division OX on 22 November 2022 which was attended by harvesters and maintenance.
  - Socialization of HSE and IBPR (Hazard Identification and Risk Assessment) Division OV on 23 November 2022 which was attended by harvesters, care and fertilizers.
  - Socialization of HSE and IBPR (Hazard Identification and Risk Assessment) Division OW on 29 November 2022 which was attended by foremen, harvesters, maintenance, fertilizers, and FFB loading and unloading workers.
  - OHSE and IBPR (Hazard Identification and Risk Assessment) Training for Division OO on 19 December 2022 which was attended by harvesters and maintenance.
  - Safety patrol in November 2022 at Estate 1, with the result that 3 harvesters did not use PPE and a follow-up has been shown.
  - November 2022 safety patrol at Estate 1, for spray workers, fertilizer workers and harvesters, and the follow-up has been shown.
  - December 2022 safety patrol at Estate 1, for grabber operators, dump truck drivers and harvesters, and the follow-up has been shown.
  - Letter of Reprimand/Warning Letter (SP) to 2 harvesters for not using full PPE while working.

Based on the verification of root cause analysis, correction, and corrective action, as well as evidence of improvement that has been shown, the non-conformity is declared **fulfilled** and will be observed again in the next audit.

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

**Verified by** : Sentot Adi Subandono

NCR No.	: 2022.04	Issued by	: Rahmat Abdiansyah
Date Issued	: 11 November 2022	Time Limit	: Next Surveillance
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based		

	on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.
Evidence observed (filled by auditor):	
<ul style="list-style-type: none"> <li>The SOP for the management of hazardous and toxic waste (B3) with Number PT/SUPP/II/2018/026 explains that each division that produces hazardous waste is required to submit hazardous waste every day to the warehouse staff to be placed in the Temporary Storage of Hazardous Waste.</li> <li>Internal Memo No. MI REVISION-02/GM/ADM/II/2020 dated 28 February 2020 from the General Manager explained in point 15 that it is forbidden to use hazardous waste packaging to store water and other purposes.</li> <li>The identification document for the source of waste from the Estate and Factory of PT Gawi Bahandep Sawit Mekar Year 2022 explains that packaging of used pesticides/chemicals must be stored in the Hazardous Waste Temporary Storage.</li> <li>Results of interviews with company representatives revealed that types of waste such as Plastic/Inner Fertilizer, Expired Pesticides and used packaging for hazardous materials must be submitted to the Temporary Storage for Hazardous Waste and will then be transported by a licensed carrier.</li> <li>Based on the results of field observations, it was found that hazardous waste management was not in accordance with the SOP, namely:             <ol style="list-style-type: none"> <li>2 Pcs Used oil packaging in the Division OH Estate water reservoir 1</li> <li>Plastic/Inner Fertilizer in Blocks J24, J25, K09, K12, and J11 Estate 1</li> <li>There are quite a lot of used oil drums as water reservoirs in Housing Division D and I Estate 1</li> <li>3 pcs of used herbicide packaging and 5 pcs of used paint packaging as a water reservoir in Division D and I Estate 1 Housing</li> <li>Plastic/Inner Fertilizer in Block E35/36, Block B20 and Block C32 Estate</li> <li>3 Pcs Pesticides brand Matador, Dipel, and Capture expired Chemicals Warehouse in Estate 2.</li> <li>3 Pcs of used paint packaging and 4 Pcs of used oil packaging at Division G Estate 2 Housing</li> <li>11 Pcs Used Oil Drums as water reservoirs in the Mill housing.</li> <li>6 Pcs of used hazardous materials packaging and used paint packaging in Mill housing.</li> </ol> </li> </ul>	
Non-Conformance Description (filled by auditor):	
Based on this evidence, the Company has not been able to demonstrate that the implementation of the waste management plan has been carried out in accordance with the procedures it has.	
Root Cause Analysis (filled by organization audited):	
Correction (filled by organization audited):	
Corrective Action (filled by organization audited):	
Assessor Evaluation and Conclusion (filled by auditor):	
Follow up on next audit (filled by auditor):	
Verified by	:

NCR No.	:	2022.05	Issued by	:	Rahmat Abdiansyah
Date Issued	:	11 November 2022	Time Limit	:	Next Surveillance
NC Grade	:	Minor	Date of Closing	:	31 January 2023
Standard Ref. &	:	7.3.3			

<b>Requirement</b>	<b>The unit of certification does not use open fire for waste disposal.</b>
<b>Evidence observed (filled by auditor):</b> <ul style="list-style-type: none"> <li>Internal Memo No MI REVISION-02/GM/ADM/II/2020 dated 28 February 2020 from the General Manager explained in point 12 that do not litter, waste is separated according to its type (organic and inorganic) and waste may not be burned.</li> <li>Based on the results of field observations, it was found that waste management was not in accordance with the Memo of the Internal General Manager, namely: <ol style="list-style-type: none"> <li>3 Trash burning in the Division O Estate housing complex 2</li> <li>1 ex-burning waste in Mill housing</li> </ol> </li> </ul>	
<b>Non-Conformance Description (filled by auditor):</b> <p>Based on this evidence, there is still domestic waste management by burning which is not in accordance with the Internal General Manager's Memo that has been owned by the company</p>	
<b>Root Cause Analysis (filled by organization audited):</b> <p>Traces of burning waste are still found in the employee housing area. This occurs because the awareness and discipline of employees in waste management by disposing of waste in its place is still low and several trash cans have been damaged.</p>	
<b>Correction (filled by organization audited):</b> <p>Ensuring employees do not burn garbage</p>	
<b>Corrective Action (filled by organization audited):</b> <ul style="list-style-type: none"> <li>Conduct socialization related to waste management policies in the Company</li> <li>Conducting Routine House Keeping together with Field Assistant, Head of Estate and Estate Manager.</li> <li>Making boards prohibiting burning of garbage in housing and around the estate.</li> <li>Replacing trash bins that have been damaged and adding trash bins in the housing.</li> </ul>	
<b>Assessor Evaluation and Conclusion (filled by auditor):</b> <p><b>Auditor Verification January 13, 2023</b> There are still auditor questions in the column Root problem analysis and Corrective Action. In addition, there has been no evidence of improvement of this discrepancy. Based on the explanation above, the non-compliance is declared as unfulfilled.</p> <p><b>Auditor Verification January 31, 2023</b> The company has sent proof of improvement in the form of:</p> <ul style="list-style-type: none"> <li>Dissemination of the Prohibition on the use of used hazardous waste packaging and the prohibition on burning waste which will be carried out on December 16, 2022.</li> <li>The socialization of the separation of organic, inorganic and hazardous waste was carried out on September 13, 2022.</li> <li>Minutes and documentation of the installation of signs prohibiting burning garbage in housing and used plastic fertilizer in employee housing areas on January 5, 2023.</li> <li>The results of housekeeping in residential areas were carried out at the same time as the socialization of the prohibition of burning in residential areas which was carried out on 16 December 2023.</li> <li>Minutes and documentation of replacing trash bins at the Estate and Mill on January 5, 2023. Trash cans are divided into 2, namely organic and inorganic waste.</li> <li>Root problem analysis, correction, and corrective action.</li> </ul> <p>Based on the evidence shown by the company, discrepancies in this indicator have been <b>fulfilled</b> and will be observed again in the next assessment.</p>	
<b>Follow up on next audit (filled by auditor):</b>	

<b>Verified by</b>	:	Rahmat Abdiansyah
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NCR No.	:	2022.06	Issued by	:	Hasiholan Sihombing
Date Issued	:	11 November 2022	Time Limit	:	ASA-1.4
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	RSPO Certification System 2020 Clause 5.5.2 Time Bound Plan			
Evidence observed (filled by auditor):					
<p>The company shows the Time Bound Plan for all management units of the subsidiary of Triputra Agro Persada Tbk which has been updated on 3 October 2022 where there are Uncertified Units that are planned to be certified past June 30, 2023. Based on the RSPO Certification System 2020 clause 5.5.2 it is known that the exception period is outside the period maximum Time Bound Plan must obtain approval from the RSPO Secretariat. Based on the announcement for the Time Bound Plan from RSPO on 21 December 2021, RSPO members must be certified no later than 5 years starting from the effective RSPO Certification System from 1 July 2018 (until 30 June 2023). The company has shown proof of sending an email to the RSPO regarding changes to the Time Bound Plan Uncertified Unit that exceeds 30 June 2023, but until this audit is completed the company has not been able to show evidence that the Time Bound Plan has received approval from the RSPO.</p>					
Non-Conformance Description (filled by auditor):					
<p>The company has not been able to show evidence that the Time Bound Plan has received approval from the RSPO.</p>					
Root Cause Analysis (filled by organization audited):					
<p>The company has shown proof of sending an email to the RSPO regarding changes to the Time Bound Plan Uncertified Unit that exceeds 30 June 2023, but until this audit is completed the company has not been able to show evidence that the Time Bound Plan has received approval from the RSPO.</p>					
Correction (filled by organization audited):					
<p>Follow up on requests for changes to the time bound plan approved by the RSPO secretariat.</p>					
Corrective Action (filled by organization audited):					
<p>Ensure the submission of changes to the time bound plan is approved by the RSPO secretariat.</p>					
Assessor Evaluation and Conclusion (filled by auditor):					
<p>Verification date January 12, 2023</p> <p>The company has provided evidence of coorection in the form of:</p> <ul style="list-style-type: none"><li>• Analysis of the root causes of non-conformities that arise and corrective actions.</li><li>• Evidence of an email capture from RSPO (<a href="mailto:certification@rspo.org">certification@rspo.org</a>) dated 13 December 2022 informing that the request for a timeline change at TBP Triputra Agro Persada Tbk has been approved.</li><li>• The file in pdf format contains a list of the entire timeline of TBP Triputra Agro Persada Tbk which has been approved by RSPO.</li></ul> <p>Based on this evidence, it can be concluded that the discrepancies in the certification system clause 5.5.2 regarding this TBP can be declared <b>Fulfilled</b>.</p>					

<i>Follow up on next audit (filled by auditor):</i>	
<i>Verified by</i>	: Hasiholan Sihombing

**3.4.3. Opportunity for Improvement**

No	Ref. Std.	Description
1	3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p> <p>In 2022 the company has developed a social management and monitoring plan as outlined in the Management Plan SIA document based on the findings of the social impact assessment at the certification unit, involvement in the process of preparing the document is known to have involved external and internal stakeholders such as Village Government, Community Leaders, Worker Unions. Based on the results of the document review review, companies are encouraged to carry out a more in-depth mapping of key stakeholders, for example for external stakeholders by paying attention to women, migrants, local residents, youth leaders, contractors and for internal stakeholders by paying attention to the representation of wider workers such as local workers. , migrants, women, new workers including contract workers.</p>
2	7.7.5	<p>Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.</p> <p>Based on a study of the year of planting and OCM (Organic Clay Material) maps revealed that the area of peat planted in 2006 was 286 ha and 2007 was 598 ha. Based on the RSPO Procedure for Drainability Assessment 2021, it is stated that a DA Report needs to be prepared prior to land clearing/Replanting of oil palm on peat. Replanting cannot take place until the DA report has been submitted for review, and RSPO approval. It stated that given the difficulty for the company/auditor to determine the exact date of replanting in the future – the reference date for the initial DAP to be prepared is 15 years after the previous planting on peat which should be recorded in company records. Based on this, companies are encouraged to carry out DA in accordance with the RSPO Procedure for Drainability Assessment 2021.</p>

**3.4.4. Noteworthy Positive Components**

No	Description
1	UoC's commitment in implementing the principles of sustainable palm oil management.
2	Good cooperation from the staffs and the personnel in charge during audit process.
3	Has composting station in order to manage the empty bunch.
4	Has obtained Proper "Biru" in 2020-2022
5	Has an Ultraviolet Filter System (UFS) installation in order to provide drinking water for employees and occupants.
6	Has obtained ISPO certificate
7	No longer use Paraquat as an active ingredient in pesticides.



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



Stakeholder Issues	Auditor Verification
<b>Manpower Agency of Seruyan District</b> Interviewee: Head of Industrial Relation Date: 8 November 2022 <ul style="list-style-type: none"> <li>• UoC has been registered their company regulation which is valid until 2024 and signed by the head of the Manpower Agency.</li> <li>• There were some mediation requests from PT GBSM in 2022, but the agency refused the mediation requests since the company doesn't hold any bipartite meeting before.</li> <li>• The minimum wage referred to the Seruyan District Minimum Wage. The minimum wage of Seruyan District is Rp. 3,317,677/month.</li> <li>• The company has provided wages to workers as stipulated in the Province Minimum Wage.</li> <li>• All workers have been registered in the social security insurance and health insurance.</li> <li>• There was no daily worker and contract worker reported to the Manpower Agency.</li> </ul>	<p>There was no negative issue that need further verification.</p>
<b>Agriculture Agency of Seruyan District (<i>Dinas Ketahanan Pangan dan Pertanian</i>)</b> Interviewee: Head of Agriculture Agency Date: 08 November 2022 <ul style="list-style-type: none"> <li>• There was no issues, complaints or complaints from the surrounding community or other parties regarding the negative impact of the company's operational activities.</li> <li>• UoC has plasma plantation partnership.</li> <li>• UoC's plantation grade in PT. Gawi Bahandep Sawit Mekar Estate was grade II. In 2021, there was an assessment of estate grade but the decree from the governor has not issued yet.</li> <li>• Firefighting simulation facility has sufficient enough and the company still in progress due to fulfill all the facilities referred to the existing regulation.</li> <li>• CSR reported in LPUP quarterly</li> </ul>	<p>There was no negative issue that need further verification.</p>
<b>Land Agency of Seruyan District (<i>Kantor Pertanahan</i>)</b> Interviewee: Head of Land Agency Date: 08 November 2022 <ul style="list-style-type: none"> <li>• There was no reported case of land disputes for the last 2 years</li> <li>• There was no overlap with forest areas and other permits</li> <li>• Aspiration: To also look after the smallholder estate since the area of plasma/smallholder estate was in low peat area.</li> </ul>	<p>There was no negative issue that need further verification.</p>
<b>Labor Union (SP GBSM)</b> Interviewee: Head of labor union (SP GBSM) Date: 8 November 2022	

Stakeholder Issues	Auditor Verification
<ul style="list-style-type: none"> <li>The company acknowledges the existence of a labor union and there was no intervention in the implementation of any operational activities.</li> <li>Member of the labor union is 50 workers. The membership of labor union is voluntary.</li> <li>Job vacancies were announced by UoC wall-boards and social media.</li> <li>Internal meetings of labor union and the bipartite meetings were held whenever its needed.</li> <li>There were still contract workers in harvesting and upkeep activity.</li> </ul>	<p>There were no negative issues related to labor union that need any further verification. The explanation regarding the interview output had been explained specifically in summary report.</p>
<p><b>Sinar Mentari Labor Union (SPSI Sinar Mentari)</b> Interviewee: Head of labor union (SPSI SM) Date: 9 November 2022</p> <ul style="list-style-type: none"> <li>The company acknowledges the existence of a labor union and there was no intervention in the implementation of any operational activities.</li> <li>Member of the labor union is 1,050 workers. The membership of labor union is voluntary.</li> <li>Internal meetings of labor union and the bipartite meetings were held whenever its needed.</li> <li>There were still contract workers in harvesting and upkeep activity.</li> </ul>	<p>There were no negative issues related to labor union that need any further verification. The explanation regarding the interview output had been explained specifically in summary report.</p>
<p><b>PT Jaya Harapan Nusa Sejahtera (Contractor collaborated in CPO transport)</b> Date: 8 November 2022</p> <ul style="list-style-type: none"> <li>The cooperation with PT GBSM was started in April 2022.</li> <li>The work agreement between PT GBSM and PT JHNS was valid until 31 December 2022.</li> <li>The workers in PT GBSM weren't permanent since all units sent to UoC's mill weren't always with the same driver.</li> <li>There were no complaints related to payments or agreements.</li> <li>All contractor workers have been provided with PPE as well as social security facilities for BPJS Health and BPJS Employment (for workers who worked more than a year).</li> <li>PT JHNS gave an aspiration for the UoC to always maintaining the mill road access.</li> </ul>	<p>There was no negative issue that need further verification.</p>
<p><b>CV Tri Mitra Sejahtera (Contractor collaborated in Palm Kernel transport)</b> Date: 8 November 2022</p> <ul style="list-style-type: none"> <li>The cooperation with PT GBSM was started in April 2022.</li> <li>The work agreement between PT GBSM and CV TMS was valid until 31 December 2022.</li> </ul>	<p>There was no negative issue that need further verification.</p>

Stakeholder Issues	Auditor Verification
<ul style="list-style-type: none"> <li>The workers in PT GBSM weren't permanent since all units sent to UoC's mill weren't always with the same driver.</li> <li>There were no complaints related to payments or agreements.</li> <li>All contractor workers have been provided with PPE as well as social security facilities for BPJS Health and BPJS Employment (for workers who worked more than a year).</li> </ul>	
<b>CV Putra Blambangan (Contractor collaborated in building construction)</b> Date: 8 November 2022 <ul style="list-style-type: none"> <li>The cooperation with PT CV PB was started in 2018.</li> <li>The work agreement between PT GBSM and CV TMS was valid from June 2022 until 31 December 2022.</li> <li>The workers in PT GBSM were 8 workers.</li> <li>There were no complaints related to payments or agreements.</li> <li>All contractor workers have been provided with PPE as well as social security facilities for BPJS Health and BPJS Employment (for workers who worked more than a year).</li> </ul>	There was no negative issue that need further verification.
<b>Workers Cooperative</b> Interviewee: Workers Cooperatives Chairman of PT GBSM  Worker's cooperatives sell worker's daily needs and doesn't provide saving and loan. Worker's cooperatives planned to provide mini-Automated Teller Machine to ease the workers in transferring money or transfer money since the ATM in UoC's area was always in queue.	There were no negative issues.
<b>Independent Business Cooperative (PT Bahandep Partnership)</b> Resource persons: Cooperative Chairman, Vice Chair, and Secretary Date: 8 November 2022. <ul style="list-style-type: none"> <li>There is a Cooperation Agreement between the Cooperative and the Company. The cooperation agreement began in 2015 and is valid for 1 crop cycle and can be extended.</li> <li>Currently the CPCL is 1,246 ha with a land area of 1,440 ha already planted.</li> <li>Partnership land management is carried out by the company.</li> <li>The agreed price for FFB is the price set by the Central Kalimantan Provincial Plantation Office.</li> <li>Payment for FFB is in accordance with the price of FFB</li> <li>Land legality of cooperative members in the form of SHM.</li> <li>Cooperative member lands have also been identified as HCV by the Consultant.</li> </ul>	There were no negative issues.
<b>Marjan and CV Kaisa Sinar Mutiara (FFB Supplier)</b> Sources: Private Suppliers and Directors Date: 8 November 2022	There were no negative issues.

Stakeholder Issues	Auditor Verification
<ul style="list-style-type: none"> <li>The origin of FFB from suppliers comes from farmers in surrounding villages, such as the village of Stitch, Pemburan Hulu, and Sembuluh Village.</li> <li>The company has taken the coordinates of the supplier farmer's land.</li> <li>The agreed FFB price is the price set by the company.</li> <li>The FFB price paid was appropriate and there were no complaints from the FFB suppliers.</li> <li>FFB payments are made within 3-4 days.</li> <li>It is legality for farmers to supply FFB in the form of SKT.</li> </ul>	
<b>Gender Committee</b> <b>Narrator: Chairman</b> <b>Date: November 8, 2022</b> <ul style="list-style-type: none"> <li>The gender committee includes all of the Estate and Mill</li> <li>Currently there are 60 members consisting of men and women</li> <li>Gender committee programs such as monthly posyandu, monthly pregnancy checks, dental check-ups for children, and gender outreach to school children.</li> <li>The company gives permission to employees to breastfeed their children while working. Currently there is also a place for breastfeeding at the Child Care Center.</li> <li>Regarding maternity leave, the company provides leave rights in accordance with the provisions.</li> <li>The gender committee program receives support from the company to implement gender committee programs.</li> </ul>	There were no negative issues.
<b>3 previous Land Owners</b> <b>Date: November 8, 2022</b> <ul style="list-style-type: none"> <li>The land compensation process is carried out by mutual agreement</li> <li>There is no coercion from the company in the land compensation process.</li> <li>Currently, there are no land disputes that have occurred.</li> </ul>	There were no negative issues.
<b>Baung Village</b> <b>Sources: Villagers</b> <b>Date: November 8, 2022</b> <ul style="list-style-type: none"> <li>There are no environmental pollution issues by the company.</li> <li>Communication and provision of information between the company and the Village have not been well established</li> <li>There has never been an issue of environmental pollution by the company.</li> </ul>	There were no negative issues.

Stakeholder Issues	Auditor Verification
<p>Jahitan Village Village head November 8, 2022</p> <ul style="list-style-type: none"> <li>There are no environmental pollution issues by the company.</li> <li>There has never been an issue of environmental pollution by the company.</li> </ul>	<p>There were no negative issues.</p>
<p>Seruyan District Environmental Service Resource persons: Acting Head of the Seruyan Regency Environmental Service Date: November 8, 2022.</p> <ul style="list-style-type: none"> <li>The permits for PT Gawi Bahandep Sawit Mekar, such as the permit for Temporary storage for hazardous and toxic waste, environmental permits and other permits, are in accordance with the provisions.</li> <li>Companies also routinely report mandatory reports such as reports on management of hazardous and toxic waste materials, POME Monitoring Reports, and Implementation of RKL-RPL every semester.</li> <li>Currently there is no submission of changes to environmental documents by the company.</li> <li>There are no environmental pollution issues by the company.</li> <li>Issues from social media related to environmental pollution are not from PT Gawi Bahandep.</li> </ul>	<p>There were no negative issues.</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>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Gawi Bahandep Sawit Mekar Direktur Utama</p>  <p><u>George Oetomo</u> Thursday, 09 February 2023</p> </div> <div style="text-align: center;"> <p>MUTU International Lead Auditor</p>  <p><u>Hasiholan Sihombing</u> Thursday, 09 February 2023</p> </div> </div>



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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Comm	Date of Contact	Response	
						Yes	No
1	Environmental Service	Seruyan District	-	By phone	8 November 2022	✓	
2	Head of Jahitan Village	Seruyan District	-	Direct Interview	8 November 2022	✓	
3	Baung Village	Seruyan District	-	Direct Interview	8 November 2022	✓	
4	Previous Land owner	Seruyan District	-	Direct Interview	8 November 2022	✓	
5	Gender Comitte	Seruyan District	-	Direct Interview	8 November 2022	✓	
6	Marjan and CV Kaisa Sinar Mutiara	Seruyan District	-	By phone	8 November 2022	✓	
7	Usaha Mandiri Coooperatif	Seruyan District	-	Direct Interview	8 November 2022	✓	
8	Manpower Agency (Dinas Tenaga Kerja dan Transparansi)	Seruyan District	-	By phone	8 November 2022	✓	
9	Agriculture Agency (Dinas Ketahanan Pangan dan Pertanian)	Seruyan District	-	By phone	8 November 2022	✓	
10	Land Agency (Kantor Pertanahan)	Seruyan District	-	By phone	8 November 2022	✓	
11	Labor Union (SP GBSM)	Seruyan District	-	Direct Interview	8 November 2022	✓	
12	Labor Union Sinar Mentari	Seruyan District	-	Direct Interview	9 November 2022	✓	
13	PT Jaya Harapan Nusa Sejahtera	Seruyan District	-	By phone	8 November 2022	✓	
14	CV Tri Mitra Sejahtera	Seruyan District	-	By phone	8 November 2022	✓	
15	CV Putra Blambangan	Seruyan District	-	By phone	8 November 2022	✓	
16	Workers Cooperative	Seruyan District	-	Direct Interview	8 November 2022	✓	
17	GBSM POM: <ul style="list-style-type: none"> <li>1 operator in WWTP</li> <li>2 Worker in Housing</li> <li>1 Operator Empty Bunch Press</li> <li>1 Operator in Composting Station</li> <li>1 warehouse clerk</li> <li>1 mechanical worker</li> <li>1 warehouse officer</li> <li>1 wheel loader operator</li> <li>2 sortation workers</li> <li>1 sterilizer operator</li> <li>1 press operator</li> </ul>	PT GBSM – Seruyan District	-	Direct Interview	9 November 2022	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Comm	Date of Contact	Response	
						Yes	No
	<ul style="list-style-type: none"> <li>1 kernel station operator</li> <li>1 laborer</li> <li>2 engine room operators</li> </ul>						
18	Estate 1: <ul style="list-style-type: none"> <li>3 harvesters</li> <li>4 manuring workers and 1 foreman</li> <li>1 operator FS and 1 worker</li> <li>2 sprayers</li> </ul>	PT GBSM – Seruyan District	-	Direct Interview	8 November 2022	✓	
19	Estate 2: <ul style="list-style-type: none"> <li>1 Worker HCV</li> <li>2 Worker Peat Subsidence</li> <li>5 Worker Pesticide</li> <li>5 Worker Fertilizer</li> <li>2 occupants</li> <li>4 daycare officers</li> <li>2 mechanical workers</li> <li>1 doctor</li> <li>2 Worken LA</li> </ul>	PT GBSM – Seruyan District	-	Direct Interview	9 November 2022	✓	
20	Estate 3 <ul style="list-style-type: none"> <li>1 grabber operator</li> <li>1 driver spraying truck</li> <li>4 sprayers</li> <li>3 manual racking</li> <li>2 harvesters, 2 fruit loss pickers, and 1 foreman</li> <li>4 manuring workers and 1 foreman</li> <li>1 nursery sprayer</li> </ul>	PT GBSM – Seruyan District	-	Direct Interview	9 November 2022	✓	
21	Aliansi Masyarakat Adat Nusantara	Jakarta	<a href="mailto:rumahaman@cbn.net.id">rumahaman@cbn.net.id</a>	Via email	19 October 2022		✓
22	Wahana Lingkungan Hidup Indonesia	Jakarta	<a href="mailto:informasi@walhi.or.id">informasi@walhi.or.id</a>	Via email	19 October 2022		✓
23	World Wide Fund	Jakarta	<a href="mailto:wwf-indonesia@wwf.or.id">wwf-indonesia@wwf.or.id</a>	Via email	19 October 2022		✓
24	Sawit Watch	Bogor	<a href="mailto:info@sawitwatch.or.id">info@sawitwatch.or.id</a>	Via email	19 October 2022		✓

**Appendix 2. Assessment Program**

DATE	7 - 11 November 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
<b>Monday, 7 November 2022</b>		
07.00 – 11.30	<b>JAKARTA → SAMPIT</b>	All Auditor
11.30 – 16.00	From the airport in Sampit to the location of certification unit	All Auditor
16.00 – 17.00	<b>OPENING MEETING</b> <ul style="list-style-type: none"> <li>Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li> <li>Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li> </ul>	All Auditor Management of PT GBSM
<b>Tuesday, 8 November 2022</b>		
08.00 – 12.00	<ul style="list-style-type: none"> <li>Stakeholders' consultation to related agencies</li> <li>Stakeholder consultation to affected communities surrounding the plantations, indigenous peoples, local communities and previous land owners</li> <li>Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Smallholders, Third Party Supplier (if any), local NGO (if any)</li> </ul>	MIA RAB MIA & RAB
08.00 – 12.00	<b>Field Observation to Estate 1</b> Aspect to be verified: <ul style="list-style-type: none"> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV;</li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health &amp; Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect</li> <li>Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place).</li> </ul>	HHS SAS HHS
12.00 – 14.00	<b>Break</b>	
14.00 – 16.30	Document verification and completing checklist	All Auditor
16.30 – 17.00	submission of audit progress	All Auditor
<b>Wednesday, 9 November 2022</b>		
08.00 – 12.00	<b>Field Observation to Estate 3</b> Aspect to be verified: <ul style="list-style-type: none"> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV;</li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health &amp; Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect</li> <li>Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control</li> </ul>	SAS SAS HHS

DATE	7 - 11 November 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 12.00	Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place).  <b>Field Observation to Estate 2</b> Aspect to be verified: <ul style="list-style-type: none"> <li>- Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV;</li> <li>- Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health &amp; Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect</li> <li>- Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place).</li> </ul>	RAB RAB MIA
12.00 – 14.00	<b>Break</b>	
14.00 – 16.30	<b>Field Observation to GBSM POM</b> <ul style="list-style-type: none"> <li>• Supply Chain verification (FFB Receiving, Weighbridge)</li> <li>• Implementation of Occupational Health &amp; Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect, security post, FFB Sorting, Processing Activity, Despatch CPO)</li> <li>• Implementation of Environmental aspect, Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond &amp; land application</li> </ul>	HHS & MIA SAS RAB
16.30 – 17.00	submission of audit progress	All Auditor
<b>Thursday, 10 November 2022</b>		
08.00 – 12.00	Continue document verification and completing checklist	All Auditor
12.00 – 14.00	<b>Break</b>	
14.00 – 16.30	Continue document verification and completing checklist	All Auditor
16.30 – 17.00	submission of audit progress	All Auditor
17.00 – ....	Interim Meeting (closing meeting preparation)	All Auditor
<b>Friday, 11 November 2022</b>		
07.30 – 09.00	<b>CLOSING MEETING</b> <ul style="list-style-type: none"> <li>• Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion)</li> <li>• Comments, Responses and Questions</li> </ul>	All Auditor and Management of Unit Certification
09.00 – 12.00	Travel from PT GBSM to Sampit	All Auditor
14.05 – ....	<b>SAMPIT → JAKARTA</b>	