

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

### **[✓] Recertification**

Name of Management Organization : Tengkalat Palm Oil Mill, PT Gunung Pelawan Lestari subsidiary of MP Evans Group Plc.  
 Plantation Name : Tengkalat Estate; Gunung Pelawan Estate; Gelam Estate; Cemara Estate.  
 Associated Smallholders: Mapur Mandiri Cooperative (Tengkalat KKPA); Ikhtiar Sejahtera Cooperative (Gunung Pelawan KKPA); Silip Lestari Cooperative (Gelam KKPA); Gunung Muda Sejahtera Cooperative (Cemara KKPA).  
 Location : Mapur Village, Riau Silip Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia  
 Certificate Code : **MUTU-RSPO/102**  
 Date of Initial Registration : 24 November 2017  
 Date of Last Issue : 09 February 2023      Date of License Issue : 24 February 2023  
 Date of Certificate Expiry : 23 November 2027      Date of License Expiry : 23 November 2023

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
RC	07 to 11 November 2022	Rizliani Aprianita Hasibuan (Lead Auditor), Asystasya A. Silalahi, Radityo Puspanjana, Darwin Simatupang	Harso Yuli Antena	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
RC	09 February 2023

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

Figure 1. Location Map of PT Gunung Pelawan Lestari	1
Figure 2. Operational Map of PT Gunung Pelawan Lestari	2
Abbreviations Used	3

**1.0 SCOPE of the CERTIFICATION ASSESSMENT**

1.1	Assessment Standard Used	5
1.2	Organization Information	5
1.3	Type of Assessment	5
1.4	Location of Mill and Plantations	6
1.5	Description of Area Statement	6
1.6	Planting Year and Cycle	7
1.7	Description of Mill and Supply Base	7
1.8	Estimate Tonnage of Certified Product	8
1.9	Other Certifications	9
1.10	Time-Bound Plan	9

**2.0 ASSESSMENT PROCESS**

2.1	Assessment Team	12
2.2	Assessment Methodology, Assessment Process and Locations of Assessment	12
2.3	Stakeholder Consultation and Stakeholders Contacted	17
2.4	Determining Next Assessment	17

**3.0 ASSESSMENT FINDINGS**

3.1	Summary of Assessment Report of the RSPO Certification	18
3.2	Conformity Checklist of Certificate and Logo Use	67
3.3	Summary of RSPO Partial Certification	68
3.4	Identification of Findings, Corrective Actions, Observations, Opportunity for Improvement and Noteworthy Positive Components	71
3.5	Summary of Arising Issues from Public and Auditor Responses	76

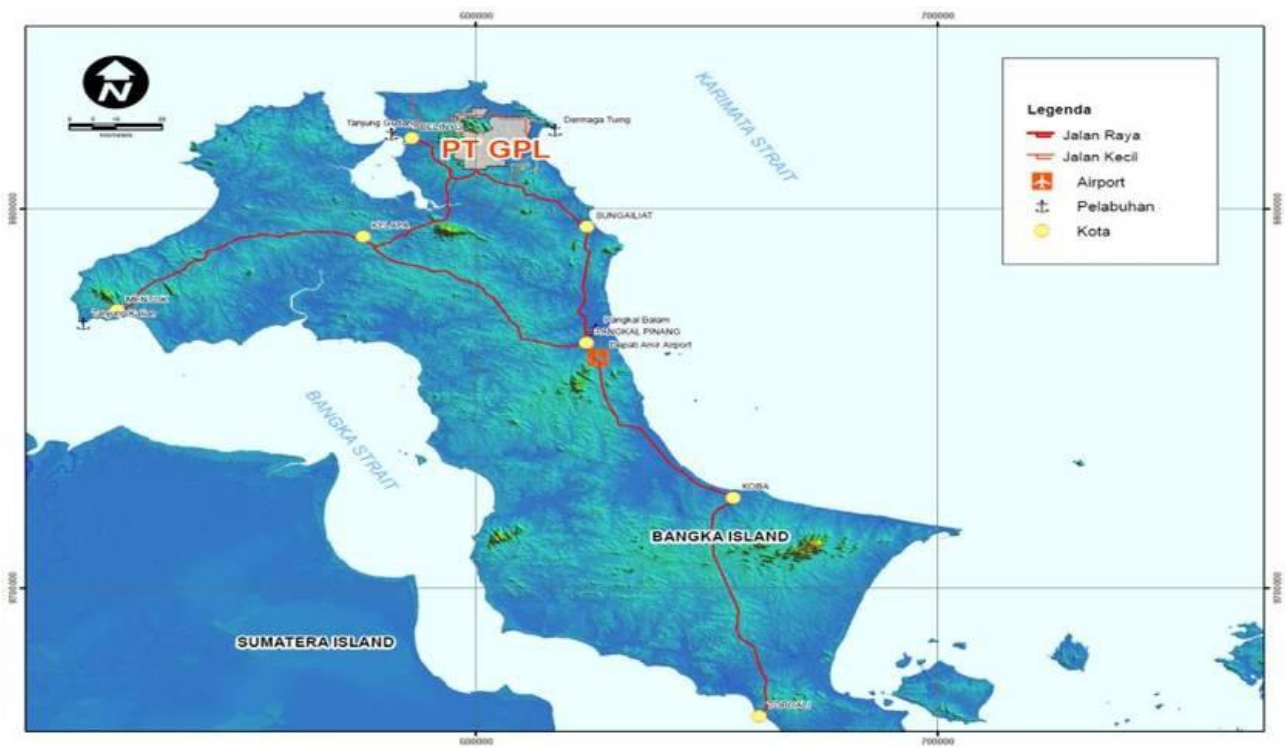
**4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY**

4.1	Formal Signing of Assessment Findings	80
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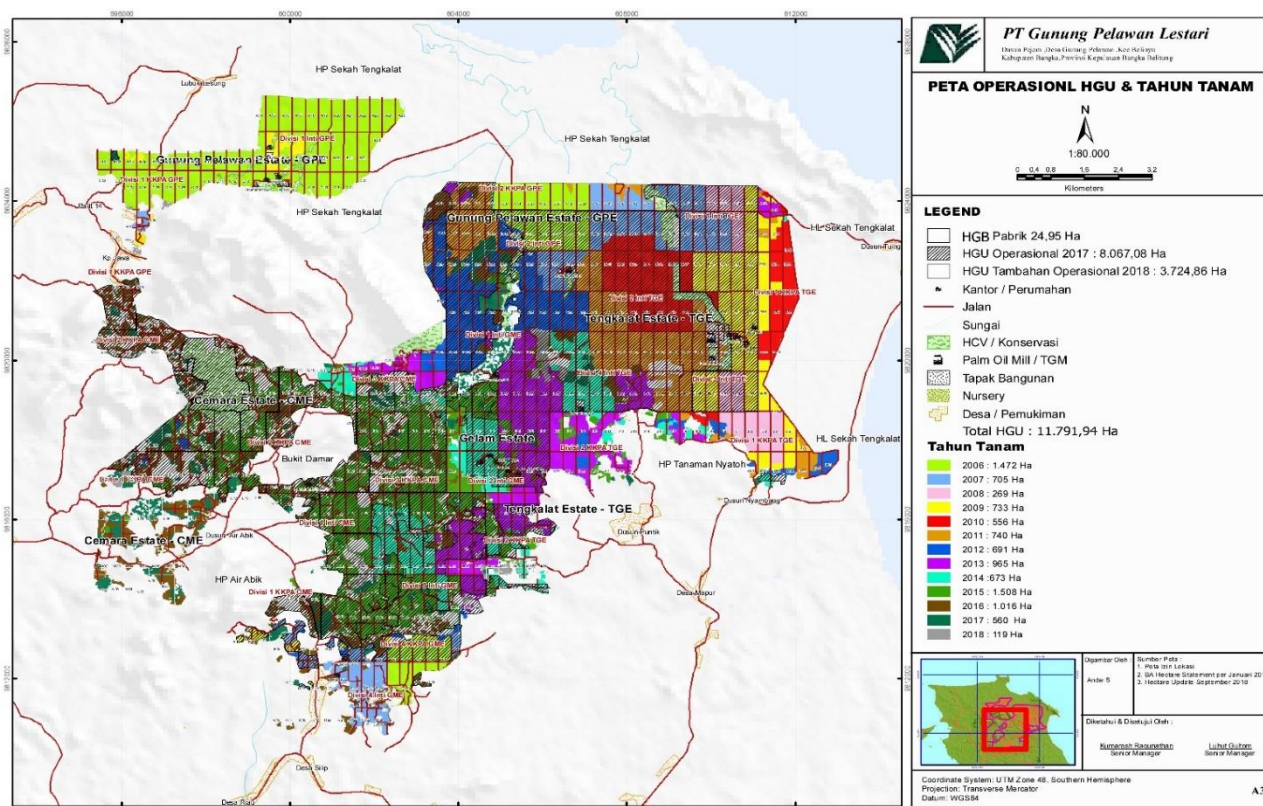
**APPENDICES**

1.	List of Stakeholders Contacted in the RSPO Certification Process	81
2.	Assessment Program	83

Figure 1. Location Map of PT Gunung Pelawan Lestari



**Figure 2. Operational Map of PT Gunung Pelawan Lestari**



**Abbreviations Used**

BMP	:	Best Management Practices
BOB	:	Barn Owl Box
BOD	:	Biological of demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Security Administrator)
CB	:	Certification Body
CH	:	Certificate Holder
CME	:	Cemara Estate
COD	:	Chemical of demand
CPO	:	Crude palm oil
CSR	:	Corporate Social Responsibility
CV	:	<i>Commanditaire Venootschap</i>
EFB	:	Empty Fruit Bunches
EIA	:	Environmental Impact Assessment
EM	:	Estate Manager
FFB	:	Fresh Fruit Bunch
ForDas	:	<i>Forum Daerah Aliran Sungai</i> (Watershed Forum)
FPIC	:	Free, Prior, Informed and Consent
GHG	:	Green House Gas
GM	:	General Manager
GME	:	Gelam Estate
GPE	:	Gunung Pelawan Estate
GPL	:	Gunung Pelawan Lestari
GPS	:	Global Positioning System
HCV	:	High Conservation Value
HGB	:	<i>Hak Guna Bangunan</i> ( Building Use Title)
HGU	:	<i>Hak Guna Usaha</i>
HOOH	:	Head Of Operational Agronomy
IDR	:	Indonesian Rupiah
ILO	:	International Labour Organization
IPB	:	<i>Institut Pertanian Bogor</i>
ISPO	:	Indonesian Sustainable Palm Oil
Kep.	:	<i>Kepulauan</i> (Island)
KKPA	:	Cooperative credit for members. Smallholder's scheme which land owned by cooperative/smallholdings, but full developed and managed by the company.
KPKS	:	<i>Komisi Pengendalian Koperasi Simpan Pinjam</i> (Savings and Loan Cooperative Control Commission)
KTU	:	Kepala Tata Usaha (Head of Administration)
kWh	:	Kilowatt hour
LA	:	Land Application
LB3	:	<i>Limbah Berbahaya dan Beracun</i> (Hazardous Waste)
LD	:	Lethal Dosage
LTA	:	Lost Time Accident
MM	:	Mill Manager
MRM	:	Management Review Meeting
MSDS	:	Material Safety Data Sheet
NGO	:	Non-Government Organization
OFI	:	Opportunity for Improvement

OHS	:	Occupational Health and Safety
PIC	:	Person In Charge
PK	:	Palm Kernel
PKWT	:	<i>Perjanjian Kerja Waktu tertentu</i> (Temporary worker)
PLC	:	Public Limited Company
PLN	:	<i>Perusahaan Listrik Negara</i> (State Electricity Company)
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PT	:	Limited Company
QC	:	Quality Control
R&D	:	Riset & Development
RKL-RPL	:	Environment management and Monitoring Plan
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened, and Endangered
SIA	:	Social Impact Assessment
SKU	:	<i>Syarat Kerja Umum</i> (Permanent worker)
SM	:	Senior Manager
SOP	:	Standard Operations Procedure
SPGPLM	:	<i>Serikat Pekerja Gunung Pelawan Lestari Mandiri</i>
SPK	:	<i>Surat Perjanjian Kerja</i> (Work Agreement)
SPSI	:	<i>Serikat Pekerja Seluruh Indonesia</i>
TGE	:	Tengkalat Estate
TGM	:	Tengkalat Mill
TM	:	<i>Tanaman Menghasilkan</i> (Mature Plant)
UPDKS	:	<i>Ulat Pemakan Daun Kelapa Sawit</i> (Palm leaf-eating caterpillars)
WHO	:	World Health Organization
WTP	:	Water Treatment Plan
WWTP	:	Waste Water Treatment Plant

<b>1.0</b>	<b>SCOPE OF THE CERTIFICATION ASSESSMENT</b>	
<b>1.1</b>	<b>Assessment Standard Used</b>	
		<ul style="list-style-type: none"> <li>• RSPO Certification Systems for Principles &amp; Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.</li> <li>• Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th April 2020.</li> </ul>
<b>1.2</b>	<b>Organization Information</b>	
1.2.1	Organization name listed in the certificate	<b>PT GUNUNG PELAWAN LESTARI subsidiary of M.P. Evans Group PLC</b>
1.2.2	Contact person	Arvind Devadasan (Manager Sustainability & Certification)
1.2.3	Organisation address and site address	RSPO registered company: Gedung Graha Aktiva Lt. 10, Jl. HR Rasuna Said Kav. 03 Blok X-1, Kuningan, Jakarta Selatan  Site: Mapur Village, Riau Silip Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia
1.2.4	Telephone	021-52920338
1.2.5	Fax	021-52920339
1.2.6	E-mail	<a href="mailto:arvind@mpevans.co.uk">arvind@mpevans.co.uk</a>
1.2.7	Web page address	<a href="http://www.mpevans.co.uk">www.mpevans.co.uk</a>
1.2.8	Management Representative who completed the application for certification	Sivabalan Subbiah
1.2.9	Registered as RSPO member	1-0027-06-000-00, October 08 <sup>th</sup> , 2006
<b>1.3</b>	<b>Type of Assessment</b>	
1.3.1	Scope of Assessment and Number of Management Unit	1 Palm Oil Mill (Tengkalat POM) and 8 supply bases: <ul style="list-style-type: none"> <li>- Gunung Pelawan Estate.</li> <li>- Gunung Pelawan KKPA (Scheme Smallholders of Ikhtiar Sejahtera Cooperative).</li> <li>- Tengkalat Estate.</li> <li>- Tengkalat KKPA (Scheme Smallholders of Mapur Mandiri Cooperative).</li> <li>- Cemara Estate.</li> <li>- Cemara KKPA (Scheme Smallholders of Gunung Muda Sejahtera Cooperative).</li> <li>- Gelam Estate.</li> <li>- Gelam KKPA (Scheme Smallholders of Silip Lestari Cooperative).</li> </ul>
1.3.2	Type of certificate	Single
<b>1.4</b>	<b>Locations of Mill and Plantation</b>	



1.4.1	Location of Mill			
	Name of Mill	Location	Coordinate	
			Latitude	Longitude
	Tengkalat POM	Mapur Village, Riau Silip Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia	S 01° 37' 18"	E 105° 59' 18"
1.4.2	Location of Certification Scope of Supply Base			
	Name of Supply Base	Location	Coordinate	
			Latitude	Longitude
	Gunung Pelawan Estate	Gunung Pelawan Village, Belinyu Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia	S 01° 35' 16"	E 105° 53' 54"
	Gunung Pelawan KKPA (Scheme Smallholders of Ikhtiar Sejahtera Cooperative with 525 members).			
	Tengkalat Estate	Mapur Village, Riau Silip Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia	S 01° 37' 26"	E 105° 59' 47"
	Tengkalat KKPA (Scheme Smallholders of Mapur Mandiri Cooperative with 466 members).			
	Cemara Estate	Gunung Muda Village, Belinyu Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia	S 01° 38' 59"	E 105° 56' 31"
	Cemara KKPA (Scheme Smallholders of Gunung Muda Sejahtera Cooperative with 1,169 members).			
	Gelam Estate	Gunung Muda Village, Belinyu Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia	S 01° 38' 59"	E 105° 56' 31"
	Gelam KKPA (Scheme Smallholders of Silip Lestari Cooperative with 227 members).			
1.5	Description of Area Statement			
1.5.1	Tenure			
	• State		11,818.21 Ha	
	• Community		0 Ha	
	Total			
1.5.2	Area Statement			
	Descriptions	Own Estates (Ha)	Scheme Smallholder/ KKPA (Ha)	Total (Ha)
	Total area	7,131.88	4,686.33	11,818.21
	Mature area	6,151.37	3,881.18	10,032.55
	Roads	187.82	138.41	326.23
	Drains	19.95	6.63	26.58
	Buildings	43.69	0.80	44.49
	Oil Mill Site	24.95	-	24.95
	Conservation	334.55	120.14	454.69
	Others	369.55	539.17	908.72
	*Others area is reserve area which can be used as planted area.			



1.6	Planting Year and Cycles														
1.6.1	Age profile of planting year														
	Planting Year	Hectarage (Ha)													
		GPE	GPE KKPA	TGE	TGE KKPA	CME	CME KKPA	GME	GME KKPA	Total					
	2006	935.82	455.85	-	-	-	-	84.40	97.95	1,574.02					
	2007	279.94	95.09	187.42	-	-	-	189.30	69.35	821.1					
	2008	-		148.14	130.21	-	-	-	-	278.35					
	2009	-	25.44	423.83	226.20	-	-	-	51.01	726.48					
	2010	-	-	329.80	212.92	-	-	-	-	542.72					
	2011	114.74	115.07	520.64	-	-	-	-	-	750.45					
	2012	213.15	67.78	-	101.59	-	34.96	350.95	-	768.43					
	2013	-	-	82.08	350.42	-	89.28	571.37	-	1,093.15					
	2014	-	-	229.74	67.27	168.18	-	244.60	-	709.79					
	2015	-	-	-	109.85	595.46	666.12	365.83	-	1,737.26					
	2016	-	67.64	-	-	-	619.46	-	37.04	724.14					
	2017	-	-	-	-	-	190.68	115.98		306.66					
TOTAL		1,543.65	826.87	1,921.65	1,198.46	763.64	1,600.50	1,922.43	255.35	10,032.55					
* The company has showed the minutes of changes to hectar statements for some of the own estates															
1.6.2	New Planting area after January 2010					6,829.87 Ha									
1.6.3	Planting Cycle					1 <sup>nd</sup> Cycle									
1.7	Description of Mill and Supply Base														
1.7.1	Description of Mill														
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Output (tonnes)	Extraction (%)						
				Out put (tonnes)	Extraction (%)	Output (tonnes)	Extraction (%)								
				Tengkalat Mill	60	310,529	73,054				23.53	17,936	5.78		
*Production data source from November 2021 to October 2022															
1.7.2	Description of Certification Scope of Supply Base														
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (ton/year)	Yield (ton/ha/ year)	Supplied to Mill		FFB (ton/year)	%						
						FFB (ton/year)									
						Gunung Pelawan Estate	1,649.88				1,543.65	42,811.67	27.73	42,811.67	100
						Gunung Pelawan KKPA (Scheme Smallholders of Ikhtiar Sejahtera Cooperative).	874.86				826.87	23,125.64	27.97	23,125.64	100
						Tengkalat Estate	2,203.53				1,921.65	52,818.69	27.49	52,818.69	100
Tengkalat KKPA (Scheme	1,315.97	1,198.46	28,279.60	23.60	28,279.60	100									

Smallholders of Mapur Mandiri Cooperative).						
Cemara Estate	1,108.31	763.64	18,139.41	23.75	18,139.41	100
Cemara KKPA (Scheme Smallholders of Gunung Muda Sejahtera Cooperative).	2,230.74	1,600.50	30,858.06	19.28	30,858.06	100
Gelam Estate	2,170.16	1,922.43	51,370.66	23.75	51,370.66	100
Gelam KKPA (Scheme Smallholders of Silip Lestari Cooperative).	264.76	255.35	6,708.44	26.27	6,708.44	100
<b>TOTAL</b>	<b>11,818.21</b>	<b>10,032.55</b>	<b>254,112.17</b>	<b>25.33</b>	<b>254,112.17</b>	<b>100</b>

*\*Production data source from November 2021 to October 2022*

**1.7.3 FFB description from other sources**

Name of sources/Organization (RSPO certified / non-certified)	Type of Organization	Number of smallholders	Production Area (Ha)	Supplied to Mill FFB (tonnes/year)
<b>Non-Certified</b>				
CV Multi Nusa Pratama	FFB Agent	-	-	35,525.98
CV Tandan Pratama	FFB Agent	-	-	261.08
Suhendra Gunawan	FFB Agent	-	-	811.56
CV Cahaya Maras Abadi	FFB Agent	-	-	18,678.62
CV Berkah Abadi Makmur	FFB Agent	-	-	14.32
CV Anugrah Reyzatama Group	FFB Agent	-	-	1,138.08
<b>TOTAL</b>				<b>56,429.64</b>

*\*Production data source from November 2021 to October 2022*

**1.7.4 Product categories**

**FFB, CPO, PK**

**1.8 Tonnage of Product**

Past Annual Claim Certified Product	Last Year Projected Certified Volume (March 2022 – Feb 2023) (MT)	Last Year Actual Certified Volume (Nov 2021 – Oct 2022) (MT)
FFB Processed	257,600	254,112.17
CPO Production	62,723	62,715.49
Palm Kernel (PK) Production	15,344	15,234.23

**1.8.2 Product selling**

Type of selling product	Actual selling product for last year (MT)
CSPO sold as RSPO certified product	35,504
CSPK sold as RSPO certified product	15,200
CSPO sold under another scheme	19,900
CSPK sold under another scheme	0
CSPO sold as conventional	1,826.47
CSPK sold as conventional	0

**1.8.3 Estimate of Certified FFB Claim**

Name of Estate(s)	Total Area	Production Area	FFB	Yield
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	(Ha)	(Ha)	(tones/year)	(tones/ha/year)
Gunung Pelawan Estate	1,649.88	1,543.65	43,000	27.86
Gunung Pelawan KKPA (Scheme Smallholders of Ikhtiar Sejahtera Cooperative).	874.86	826.87	23,000	27.82
Tengkalat Estate	2,203.53	1,921.65	53,000	27.58
Tengkalat KKPA (Scheme Smallholders of Mapur Mandiri Cooperative).	1,315.97	1,198.46	30,000	25.03
Cemara Estate	1,108.31	763.64	19,000	24.88
Cemara KKPA (Scheme Smallholders of Gunung Muda Sejahtera Cooperative).	2,230.74	1,600.50	33,000	20.62
Gelam Estate	2,170.16	1,922.43	52,000	27.05
Gelam KKPA (Scheme Smallholders of Silip Lestari Cooperative).	264.76	255.35	7,000	27.41
<b>TOTAL</b>	<b>11,818.21</b>	<b>10,032.55</b>	<b>260,000</b>	<b>25.96</b>

*\*Projected FFB production for 12 months of certificate*

#### 1.8.4 Estimate of Certified Palm Product Claim

Name of Mill	Capacity (tones/ hour)	FFB Processed (tones/year)	CPO		Palm Kernel		Supply Chain Module
			Out put (tones)	Extraction (%)	Out put (tones)	Extraction (%)	
Tengkalat POM	60	260,000	62,400	24	14,300	5.5	MB

*\*Projected CSPO and CSPK production for 12 months of certificate*

#### 1.9 Other Certifications

ISO 9001:2015	-
ISO 14001: 2015	-
ISO 45001: 2018	-
ISCC	EU-ISCC-Cert-DE119-62229409 valid form 18 November 2022 to 17 November 2023
Others	ISPO Certified (MUTU-ISPO/180) valid from 22 August 2019 to 21 August 2024.

#### 1.10 Time Bound Plan

##### 1.10.1 Time Bound Plan for Other Management Unit

Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status
MILL	Time Bound Plan				
Pangkatan	2012	Pangkatan Estate (PT Pangkatan Indonesia)	2012	Labuhanbatu District, Sumatera Utara Province	Certified
		Sennah Estate (PT Sembada Sennah Maju)	2012	Labuhanbatu District, Sumatera Utara Province	Certified
		Bilah Estate (PT Bilah Plantindo)	2012	Labuhanbatu District, Sumatera Utara Province	Certified
Bumi Permai	2013	PT Prima Mitrajaya Mandiri	2013	Kutai Timur District, Kalimantan Timur Province	Certified

		Koperasi Subur Makmur	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Sawit Etam Bersama	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Tanah Sama	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Mitra Sawit Mandiri	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Grenseng Indah	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Maju Membangun	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		PT Teguh Jaya Prima Abadi	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Karya Bersama	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Mitra Sejahtera Abadi	2013	Kutai Timur District, Kalimantan Timur Province	Certified
Rahayu	2021 Non Certified (Commissioning 2020)	PT Teguh Jaya Prima Abadi	2013	Kutai Timur District, Kalimantan Timur Province	Certified (currently supply FFB to Bumi Permai Mill)
		Koperasi Karya Bersama	2013	Kutai Timur District, Kalimantan Timur Province	
		Koperasi Mitra Sejahtera Abadi	2013	Kutai Timur District, Kalimantan Timur Province	
		Koperasi Maju Membangun II	2023	Kutai Timur District, Kalimantan Timur Province	Have not obtained the HGU
		Koperasi Sawit Etam Bersama II	2023	Kutai Timur District, Kalimantan Timur Province	Have not obtained the HGU
		Koperasi Tanah Sama II	2023	Kutai Timur District, Kalimantan Timur Province	Have not obtained the HGU
Benuang	2023 Non Certified (Commissioning 2021)	PT Bumi Mas Agro	2023	Kutai Timur District, Kalimantan Timur Province	Non-Certified (currently send FFB to outsider mill)
		Koperasi Dugai Jaya Mandiri	2023	Kutai Timur District, Kalimantan Timur Province	
		Koperasi Marukangan Sejahtera Mandiri	2023	Kutai Timur District, Kalimantan Timur Province	
		Koperasi Jaya Harapan Bersama	2023	Kutai Timur District, Kalimantan Timur Province	
Tengkalat	2017	PT Gunung Pelawan Lestari	2017	Bangka District, Kepulauan Bangka Belitung Province	Certified
		Koperasi Ikhtiar Sejahtera	2017	Bangka District, Kepulauan Bangka Belitung Province	Certified
		Koperasi Silip Lestari	2017	Bangka District, Kepulauan Bangka Belitung Province	Certified
		Koperasi Mapur Mandiri	2017	Bangka District, Kepulauan Bangka Belitung Province	Certified
		Koperasi Gunung Muda Sejahtera	2017	Bangka District, Kepulauan Bangka Belitung Province	Certified

	-		PT Evans Lestari	2023	Musi Rawas District, Sumatera Selatan Province	Currently FFB delivered to outside mill
	-		PT Simpang Kiri Plantation Indonesia	2023	Aceh Province	Currently FFB delivered to outside mill
	Note: TBP approved by Evans Group on 3 October 2022					
1.10.2	<b>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</b>					
	All smallholders of PT Gunung Pelawan Lestari has been certified since 2017 together with the own Estates.					

<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>RC</b>	<p>1. <b>Rizliani Aprianita Hasibuan (Lead Auditor)</b>. Indonesian Citizen. Bachelor and Magister of Agribusiness, Faculty of Agriculture. She had followed training such as RSPO Lead Auditor Training, SCCS training, lead Auditor ISO 9001:2008, ISO 14001:2004, SA 8000, OHSAS 18001, social audit training by RSPO (verité), ISPO Auditor training and followed several IHT related to environment, BMP etc. She has been involved in several audit activities related to sustainable palm oil certification since 2015 covering legal, social aspect, health and safety aspect, worker welfare, waste management aspect etc. In this audit, she assigned to verify worker welfare, transparency, BMP and OHS aspects.</p> <p>2. <b>Asystasha Aishah Silalahi (Auditor)</b>. Indonesia Citizen, Bachelor of Economy, Major of Agribusiness, Faculty of Economic and Management. She has one year experience in consultancy. She has followed training such as ISPO Auditor Training, Lead Auditor ISO 9001:2015, OHS General Expert, RSPO lead auditor training course, SCCS, and several in house training related to environmental, BMP, SA 8000. Has been involved in several audit activities since 2016 related to sustainable palm oil certification covering waste management aspect, Social Aspect, Health and Safety Aspect, and Worker Welfare. During this audit, she verified legal, land dispute, and SCCS aspect</p> <p>3. <b>Radytio Puspanjana (Auditor)</b>. Indonesian Citizen. Bachelor of agriculture, majoring in Soil Science. Agriculture Faculty. He was working as honorarium Officer at the Riau Province Plantation Agency in the division of huge estate for 1 year. The participated trainings are Survey and Mapping (GIS) Training which was held by National GMTI, ISPO auditor training, ISO 9001/2008 auditor training, ISO 14001/2004 auditor training, IHT Geospatial Information System, IHT High Conservation Value, IHT Environmental Impact Assessment, IHT Green House Gas and RSPO Lead Auditor Course by Checkmark Training. Since 2015 has been following many audit as auditor base on Best Management Practice and Environment. In this audit he is responsible for assessing the aspects of Environment, HCV, Social, and GHG Aspects.</p> <p>4. <b>Darwin Simatupang (Auditor Trainee)</b>. Indonesian citizen. Bachelor of Agriculture, majoring in Soil Science and Land Resource from IPB University. Has one year experience as agronomist in palm oil plantation company. Training has been attended including Indonesian Sustainable Palm Oil (ISPO), Lead Auditor of ISO 9001: 2015, Awareness ISO 17021: 2015, Awareness ISO 17065: 2012, Awareness ISO 14001: 2015, Awareness ISO 45001: 2018, Awareness ISO 19011: 2018. During this assessment has verified Best Management Practices and Occupational Health and Safety 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>RC</b>	<p>Number of auditors: 3 auditor and 1 auditor trainee</p> <p>Number of days for Onsite Assessment at site: 5 days</p> <p>Number of working days for Onsite Assessment at site : 15 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>RC</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Gunung Pelawan Lestari to the requirements of <b>Principles and Criteria for the Production of Sustainable Palm Oil 2018, Endorsed by the RSPO Board of Governors on 20th April 2020 and RSPO Certification Systems for Principles &amp; Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.</b></p> <p>The audit program is included as Appendix 2. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.</p>

The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.

The scope of certification consists of 1 mill and its supply base which consists of 4 own estates and 4 plasma estates. Because the supplybase consists of 4 own estates and 4 plasma estates, all supplybase units are the audit sample.

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

Public Stakeholder Notification was made on RSPO and Mutu Website. There is no written negative feedback receive. Stakeholder consultation involved internal and external stakeholders. Meetings were 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 meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings. The comments made by external stakeholders were also taken into account in the assessment

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal meetings at their housing. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix I.

Some opportunities for improvement of the results **RC** delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (**ASA-1.1**)

The assessment program please find Appendix 2

<b>2.2.3</b>	<b>Locations of Assessment</b>
<b>RC</b>	<p>The sampling location consider the issue arise from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p><b>Tengkalat POM</b></p> <ul style="list-style-type: none"> <li>• <b>Security post.</b> Interview with security related to work procedure, emergency response, worker welfare, OHS implementation in mill, and supply chain aspect.</li> <li>• <b>Weighbridge station.</b> Interview with worker related to supply chain aspect and worker welfare.</li> <li>• <b>Grading station.</b> Interview with worker related to work procedure, emergency response, worker welfare, and OHS implementation in mill.</li> <li>• <b>Sterilizer Station.</b> Observations and interviews related work procedure, safety aspect, worker welfare and complaint mechanism.</li> <li>• <b>Engine Room.</b> Observations and interviews related work procedure, safety aspect, worker welfare and complaint mechanism.</li> <li>• <b>Boiler Station.</b> Observations and interviews related work procedure, safety aspect, worker welfare etc and complaint mechanism.</li> <li>• <b>Kernel Station.</b> Observations and interviews related work procedure, safety aspect, worker welfare and complaint mechanism.</li> <li>• <b>CPO despatch station.</b> Interview with worker related to work procedure, worker welfare, OHS implementation in</li> </ul>



mill, and supply chain aspect.

- **Workshop.** Observation and interview to store keeper related to OHS, waste management and worker welfare aspect.
- **Solid Waste.** Observation of the management of Solid waste consist of fiber and shell from the production process of mill.
- **Composting station.** Observation of the management of EFB from the production process of mill to composting.
- **WWTP.** Field observations related to Ban to entry to WWTP, run off, testing of effluent.
- **Reservoir.** Field observations related management and monitoring water source for mill process.
- **Mill Drainage.** Observations mill effluent lines, sanitation mill and flow of leaching mill.
- **WTP.** Observations and interviews related to water management, recording of water use, health checks, PPE and waste management.
- **Biogas plant.** Field observations related to POME management for biogas.

#### Tengkalat Estate

- **Boundary pole BPN number 24, 25, 29, 91, 343, 341, 259, 296 and 616.** Observation about legal operational boundary.
- **HCV Tengkalat River Riparian Area, Block C46.** Observation the implementation of management in HCV of riparian area.
- **HCV Forest (Gelang tree) Area, Block F49.** Observation the implementation of management in HCV of forest area.
- **Ex-mining Block F49.** Observation related the area condition.
- **Harvesting activity, Div 3 Block H47.** Observation and interview with workers related to Procedure implementation, OHS implementation, workers welfare, wages and complaint mechanism.
- **Circle and Path Spraying activity, Div 3 Block H51.** Observation and interview with workers related to Procedure implementation, OHS implementation, workers welfare, chemical handling and complaint mechanism.
- **Manuring activity, Div 3 Block H53.** Observation and interview with workers related to Procedure implementation OSH implementation, workers welfare, wages and complaint mechanism.
- **Selective weeding activity, Div 1 Block G53.** Observation and interview with workers related to Procedure implementation OSH implementation, workers welfare, wages and complaint mechanism.
- **Fire monitoring tower, Div 3 Block E40.** Observation related OHS implementation and monitoring fire.
- **Hazardous Waste Storage.** Observation and interview related OHS, material handling, and hazardous waste management.
- **Material Storage.** Observation and interview related material handling and PPE stock
- **Clinic.** Observation dan interview related to emergency response, medical facility, work accident, waste management and medical checkup.
- **PPE warehouse and Mixing Area.** Observation and interviews related to washing of working tools, PPE spray teams and used pesticide containers handling.
- **Fertilizer Warehouse.** Observation and interview for material handling, OHS, and hazardous material handling.
- **Housing complex and Facilities.** Observation and interview regarding facilities and infrastructure housing area.
- **Fire extinguisher.** Land fire emergency response simulation.
- **Chemical Storage.** Observation and interview related to management of agrochemical material and waste, MSDS, emergency response facilities, OHS and the types of pesticides used.
- **Workshop.** Observation and interview related to work procedure, OHS, waste management and worker welfare aspect.
- **Landfill block G42 division 2.** Observation related to waste management.
- **Daycare of Tengkalat.** Observations and interviews with workers related to Employment aspects

#### KKPA Tengkalat

- **Harvesting activity, Block J50.** Observation and interview with workers related to Procedure implementation, OHS implementation, workers welfare, wages and complaint mechanism.

- **Manuring activity, Block H53.** Observation and interview with workers related to Procedure implementation OSH implementation, workers welfare, wages and complaint mechanism.
- **Subsidence Stakes and Piezometer Block E 53/54.** Observation for Piezometer and Subsidence pole.

#### Gelam Estate

- **Boundary stake No. GPL 692 dan GPL 264.** Observation about stake condition and the boundary.
- **HCV area Block F33.** Observation about HCV management.
- **Harvesting activity, Div 1 Block G29.** Observation and interview with workers related to Procedure implementation, OHS implementation, workers welfare, wages and complaint mechanism.
- **Circle and Path Spraying activity, Div 2 Block N26.** Observation and interview with workers related to Procedure implementation, OHS implementation, workers welfare, chemical handling and complaint mechanism.
- **Manuring activity, Div 4 Block R23.** Observation and interview with workers related to Procedure implementation OSH implementation, workers welfare, wages and complaint mechanism.
- **Upkeep Road activity, Div 2 Block K32.** Observation and interview with workers related to Procedure implementation OSH implementation, workers welfare, wages and complaint mechanism.
- **Barn owl, Div 2 Block K32.** Owl nest management observation.
- **Landfill, Div 1 Block G36.** Observation related to waste management.
- **Material storage.** Observation about storage condition, PPE stock, and interview with storage keeper about their job description, manpower aspect, and OSH implementation.
- **Agrochemical storage.** Observation about storage condition, chemical stock, and interview with storage keeper about their job description, manpower aspect, and OSH implementation.
- **Fertilizer storage.** Observation about storage condition, fertilizer stock, and interview with storage keeper about their job description, manpower aspect, and OSH implementation.
- **Oli storage.** Observation about storage condition, oil stock, and interview about storage keeper about job description, manpower aspect, and OSH implementation
- **Fuel tank.** Observation about solar tank condition and OSH implementation, and emergency equipment.
- **Workshop.** Observation about workshop condition, emergency equipment, waste management, and interview about their job description, manpower aspect, and OSH implementation.
- **Hazardous waste storage.** Observation about storage condition, waste kept in storage, hazardous waste management, and emergency equipment.
- **Housing complex G2.** Observation about housing condition, domestic waste management, and other facilities provided by company for workers.

#### KKPA Gelam Estate

- **Boundary stake number KOP 815 and KOP 280.** Observation about stake condition and the boundary.
- **Selective weeding activity, Block P26.** Observation and interview with workers related to Procedure implementation OSH implementation, workers welfare, wages and complaint mechanism.

#### Gunung Pelawan Estate

- **Boundary pole BPN number KOP 004, KOP 109, GPL 061, GPL 059, and GPL 056.** Observation about legal operational boundary.
- **Barn Owl cage Block C09.** Owl nest management observation
- **HCV River Riparian Area, Block E38.** Observation the implementation of management in HCV of riparian area.
- **Manuring activity, Block B21.** Observation and interview with workers related to Procedure implementation OSH implementation, workers welfare, wages and complaint mechanism.
- **Agrochemical storage.** Observation about storage condition, chemical stock, and interview with storage keeper about their job description, manpower aspect, and OSH implementation.

- **Fertilizer storage.** Observation about storage condition, fertilizer stock, and interview with storage keeper about their job description, manpower aspect, and OSH implementation.
- **Material storage.** Observation about storage condition, PPE stock, and interview with storage keeper about their job description, manpower aspect, and OSH implementation.
- **Workshop.** Observation about workshop condition, emergency equipment, waste management, and interview about their job description, manpower aspect, and OSH implementation.
- **Housing complex G2.** Observation about housing condition, domestic waste management, and other facilities provided by company for workers.
- **Daycare.** Observation about facility in daycare and interview with worker about their job description, manpower aspect, and facilities provided by company for workers.
- **Clinic.** Observation about service in clinic and interview with nurse about work accident record, manpower aspect, and infectious waste management.
- **Hazardous waste storage.** Observation about storage condition, waste kept in storage, hazardous waste management, and emergency equipment
- **Housing complex and Facilities of Benak area block E38.** Observation and interview regarding facilities and infrastructure housing area.
- **Housing Complex of Benak area block E38.** Observation to housing complex facilities, such as house condition, clean (for drink) water refill, assembly point, fire extinguisher, prayer building, child care and landfill for domestic waste.

#### KKPA Gunung Pelawan Estate

- **Boundary pole BPN number KOP 004 and KOP 109.** Observation about legal operational boundary.
- **Harvesting activity, Block C08.** Observation and interview with workers related to Procedure implementation, OHS implementation, workers welfare, wages and complaint mechanism.
- **Circle and Path Spraying activity, Block C10.** Observation and interview with workers related to Procedure implementation, OHS implementation, workers welfare, chemical handling and complaint mechanism

#### Cemara Estate

- **Boundary pole BPN number GPL 025, GPL 01 and GPL 07.** Observation about legal operational boundary.
- **HCV Forest (Damar Hill) Area, Block J13.** Observation the implementation of management in HCV of forest area.
- **Housing Complex of Bulin block G13.** Observation to housing complex facilities, such as house condition, clean (for drink) water refill, assembly point, fire extinguisher, prayer building, child care and landfill for domestic waste.
- **Material Warehouse.** Observations and interviews with officers related to the work system, OHS warnings, MSDS, emergency response systems, first aid kits, and safe work practices.
- **Oil Storage.** Observation and interview related stock of PPE.
- **Chemical Warehouse and pesticide mixing area.** Observations and interviews with officers related to the work system, OHS warnings, MSDS, emergency response systems, first aid kits, and safe work practices.
- **Fertilizer Warehouse.** Observations and interviews with officers related to the work system, OHS warnings, MSDS, emergency response systems, first aid kits, and safe work practices.
- **Schedule Waste Storage.** Field observations and interview related to the fulfillment of the attribute's health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse.
- **Workshop.** Observation and interviews with employees related to management of hazardous waste and hazardous material, training, provision of PPE, training, emergency response facilities.
- **Body shower of spraying team and pesticide PPE storage.** Observation the conditions body shower room and PPE handling.
- **Harvesting Block M24.** Observations and interviews related to work procedure, OHS and Employment aspects.
- **Spraying Block L24.** Observations and interviews related to work procedure, OHS and Employment aspects.
- **Landfill block L22.** Observation related to waste management

	<b>KKPA Cemara Estate</b> <ul style="list-style-type: none"> <li>• <b>Harvesting Block L10.</b> Observations and interviews related to work procedure, OHS and Employment aspects.</li> <li>• <b>Manuring Block K26.</b> Observations and interviews related to work procedure, OHS and Employment aspects.</li> <li>• <b>FFB Loading K27.</b> Observations and interviews related to work procedure, OHS and Employment aspects.</li> <li>• <b>Boundary pole BPN number KOP 53, KOP 54, KOP 153.</b> Observation about legal operational boundary.</li> </ul>
<b>2.3</b>	<b>Stakeholder Consultation and Stakeholders Contacted</b>
<b>2.3.1</b>	<b>Summary of stakeholder consultation process.</b>
<b>RC</b>	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Gunung Pelawan Lestari was held by:</p> <ul style="list-style-type: none"> <li>• Public Notification on RSPO and PT Mutuagung Lestari website on October 4, 2022.</li> <li>• Public consultation with NGOs (by email) such as WALHI, WWF, and Sawit Watch on October 24, 2022</li> <li>• Public consultation by phone with government institution on November 8, 2022.</li> <li>• Public consultation meeting with communities on November 8, 2022.</li> <li>• Public consultation meeting with internal stakeholders and contractor on November 7, 2022.</li> </ul> <p>Numbers of input from stakeholders were clarified by PT Gunung Pelawan Lestari.</p>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	Please find appendix 1
<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit ( <b>ASA-1.1</b> ) will be conducted until twelve (12) months after date of annual license.

### 3.0 ASSESSMENT FINDINGS

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

MUTUAGUNG LESTARI has conducted an assessment of **Tengkalat POM – PT Gunung Pelawan Lestari subsidiary of Evans** operation consisting of one (1) mill and four (4) oil palm estates and four (4) scheme smallholders.

During the assessment, there was one (1) Nonconformity were assigned against Major/Critical Compliance Indicators and one (1) opportunities for improvement were identified. Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5.

MUTUAGUNG LESTARI found that **Tengkalat POM – PT Gunung Pelawan Lestari subsidiary of Evans** complied with the requirements of **Principles and Criteria for the Production of Sustainable Palm Oil 2018, Endorsed by the RSPO Board of Governors 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 issued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>	
<b>1.1</b> <b>The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</b>	
<b>1.1.1</b> The company has an SOP on Transparency of Information document number GPL/SOP/Umum-02 revision 1 dated 4 September 2013. The SOP explains the mechanism for communication with the public as well as a list of documents that can be accessed by all parties and limited documents. The following are examples of publicly accessible documents <ul style="list-style-type: none"> <li>• Vision and mission of the company</li> <li>• Company policy</li> <li>• Company procedures</li> <li>• UKL UPL report, <i>Amdal</i> (Environmental Impact Assessment)</li> <li>• HCV report and management plan</li> <li>• And other documents in accordance with RSPO guidelines</li> </ul> In addition, the company also submits mandatory documents to relevant agencies on a regular basis in accordance with applicable requirements and conditions, for example: <ul style="list-style-type: none"> <li>• Report on the use and utilization of HGU for 2021 which was submitted to the Bangka Regency Land Office dated 10 January 2022</li> <li>• Report on the progress of the plantation business for the third quarter of 2022 which was submitted to the Agriculture and Food Security Service of the Kepulauan Bangka Belitung Province and to the Food and Agriculture Service of Bangka Regency on 24 October 2022.</li> </ul>	
<b>1.1.2</b> The company has also reported several mandatory reports to relevant stakeholders, for example: <ul style="list-style-type: none"> <li>• Report on the use and utilization of HGU for 2021 which was submitted to the Bangka Regency Land Office dated 10 January</li> </ul>	



2022

- Report on the progress of the plantation business for the third quarter of 2022 which was submitted to the Agriculture and Food Security Service of the Kepulauan Bangka Belitung Province and to the Food and Agriculture Service of Bangka Regency on 24 October 2022

Those documents are provided in appropriate language. Based on explanation above, company has provide information in appropriate language and accessible to relevant stakeholders.

### 1.1.3

The company records requests for information from stakeholders in documents of Incoming and Outgoing Letters of External Stakeholders. The book informs about the date of the incoming letter, subject matter, and the date of the letter's response. Based on the review of these documents, incoming letters from stakeholders related to requests for assistance or submission of proposals. Then, the company shows examples of responses to incoming mail, for example:

- Incoming letter from Riau Silip District regarding assistance for volleyball tournament funds dated July 22, 2022. The company showed a letter of approval for the application submitted on July 25, 2022.
- Incoming letter from Mapur Village regarding financial assistance for TPA rehabilitation in Mapur Village dated 30 July 2022. The company showed a letter of approval for the application submitted on 3 August 2022.

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

### 1.1.4

The unit of certification shows the document for dissemination of consultation and communication procedures to stakeholders. One example of the socialization that was carried out to TGM employees on March 2, 2020 was about communication, complaints, the environment and business ethics. While examples for external socialization carried out are as follows:

- Minutes of socialization of ISPO/RSPO, Environment, HCV, and company policies to 39 people of Gunung Muda Village on 22 October 2020. (Cemara Estate)
- Minutes of socialization of ISPO/RSPO, Environment, HCV, and company policies to 32 people of Silip Village on 17 November 2020. (Gelam Estate)
- Minutes of socialization of ISPO/RSPO, Environment, HCV, and company policies to 18 people of Gunung Pelawan Village on 8 December 2020. (Gunung Pelawan Estate)
- Minutes of socialization of ISPO/RSPO, Environment, HCV, and company policies to 16 people of Mapur Village on November 5, 2020. (Tengkalat Estate)

Based on interview with representative of Mapur and Gunung Muda Village, contractors (such as CV Tiara Mapur), and to related government agency in Bangka Regency, it is known that the company has conducted socialization related to SOPs for communication and providing information. The stakeholders also understand how to deliver or submit information request/consultation with the company. Based on explanation above, this indicate that the procedure of consultation and communication has explained to all relevant stakeholders.

### 1.1.5

PT Gunung Pelawan Lestari already has a stakeholder list for 2021, which contains the names, positions, and telephone numbers of the local Sub District, Village Head, Sub-Village Head, Police, BPJS Health Facilities, Government Agencies of Bangka Regency and Kepulauan Bangka Belitung Province, NGOs, educational institutions, Suppliers, Contractors, Management and Supervisors of Cooperatives (Ikhtiar Sejahtera, Silip Lestari, Gunung Muda Sejahtera, Mapur Mandiri), and previous land owners. Auditor checks by calling the numbers recorded in the document, from the results of checking that the phone numbers are in accordance with the existing list.

**Status: Comply**

## 1.2

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

### 1.2.1

PT Gunung Pelawan Lestari which is a plantation company under Evans Group Indonesia has a Policy on Sustainability and Business Ethics in July 2019. This policy explains about transparency and complaints, OHS, anti-bribery and anti-corruption, responsible employment (e.g. regarding modern slavery, sexual harassment, equality and anti-discrimination) and workers' rights.

Company has socialized the code of ethics to the stakeholder, for example:

- Socialization on February 22, 2022 which was attended participants from CME
- Socialization on January 19, 2022 which was attended participants from GPE
- Socialization on July 6, 2022 which was attended participants from contractor

The results of interviews with stakeholders such as workers and contractors (such as CV Tiara Mapur), obtained information that the company has provided socialization related to the company's ethical policies.

### 1.2.2

The company has several systems in place to monitor compliance and the implementation of ethical business policies and practices, namely:

- Through SOP of dispute solution (No. HRD-SOP15-01) which explained activities of dispute identification, dispute analysis, dispute management planning, dispute handling implementation, monitoring, evaluation and reporting.
- Through SOP No. GPL/SOP/Umm-05 dated on 25 April 2013 concerning in handling internal and external complaints. The policy explained about the company's procedure of handling and documenting any complaints.

In addition, the company also routinely conducts internal audits every year covering aspects of the RSPO including ethical behavior. The RSPO internal audit conducted on 16 – 20 August 2022. Based on verification on complaints logbook and results of the internal audit, known that there is no indication of a violation of ethical behavior.

Status: Comply

## PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

### 2.1

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

#### 2.1.1

Regarding the legal compliance, the company has been shown the legal compliance toward Indonesia law such as HGU and IUP that described in more detail in indicator 4.4.1

#### Legality

Unit management shows evidences related to legality implementation, includes:

- Land Use Title Certificate for Business unit.
- Plantation Permit for each Business unit.

#### Compliance with Worker Welfare Regulations

The determination of wages at PT Gunung Pelawan Lestari is based The Decree of the Governor of Bangka Belitung Island No. 188.44/1009/Disnaker/2021 dated November 15, 2021 concerning the Minimum Wage of Bangka Belitung Island Province in 2022 which is Rp. 3,264,884.

#### Environmental Aspect

The company Unit has shown compliance with laws and regulations, for example:

- Has been implements the requirement of environment aspect such as EIA management and monitoring in routinely (refer to criteria 3.4).
- Has been manage the hazardous waste and domestic waste in accordance with applicable regulation (refer to criteria 7.3).
- Land preparation without burning and has the infrastructure in fire anticipation, according to *Permentan* Number. 26 of 2007 section 15. (Refer to criteria 7.11).
- Has been implements the requirement of POME to land application accordance with applicable regulation (refer to criteria 7.8).
- The company already has a permit to utilize POME to the ground for application to soil in accordance with the Decree of the



Head of DINPMP2KUKM Bangka Regency number 188.4/01/IPAL/DINPMP2KUKM/IV/2019 on April 1, 2019 with a validity period of 5 years.

- Environmental permits in accordance with the Decree of the Regent of Bangka Number 188.45.154.2/LH/2014 concerning environmental permits for oil palm plantation and processing mill activities in Silip Village and Mapur Village, Riau Silip District and in Gunung Muda Village and Gunung Pelawan Village, Belinyu District, Bangka Regency, Kepulauan Bangka Belitung Province.
- The water use permit is determined based on the Decree of the Minister of Public Works and Public Housing number 122/KPTS/M/2018 dated 15 February 2018 which is valid for 5 years from the date of stipulation.

Based on document verification, it is known that the company already has a permit for temporary storage of hazardous and toxic waste located at Gunung Pelawan Estate, Tengkalat Estate, and Gelam Estate, but the permit has expired on September 9, 2021.

The company can show the progress of the permit extension. these are as follows:

- Letter Number 43/GPL-SC/SRT/IX/2021 dated September 1, 2021 regarding directions and requests for extension of permits for temporary storage of hazardous and toxic wastes to the Office of Investment and One Stop Service for Small and Medium Enterprises Cooperatives.
- Minutes of the handover of the extension document by attaching an application letter for extension and a permit for temporary storage of PT GPL's hazardous and toxic Material Waste which has been received by the Investment Office on September 1, 2021.
- Reply letter from the Office of Investment and One Stop Service for Small and Medium Enterprises Cooperatives in Bangka Regency on October 14, 2021 regarding directions for the management of hazardous and toxic wastes with directions that PT GPL's environmental approval needs to be changed through the OSS system at oss.go.id.
- Letter from PT GPL to the Director of Verification of Waste Management Hazardous and Toxic Materials and Non-Hazardous and Toxic Materials of the Ministry of Environment and Forestry Number 199/DIR-GPL/X/2021 on October 25, 2021 regarding the application for technical directions for the extension of the permit for temporary storage places Waste Hazardous and toxic materials. In the letter, the company also attaches documents such as NIB, Deed of Establishment, Plantation Business Permit, permit for temporary storage of hazardous and toxic waste, identification of waste sources, and a map of the location of temporary storage of hazardous and toxic waste and these documents have been received. by the One Stop Service of the Ministry of Environment and Forestry on October 21, 2021.
- Letter from the Ministry of Environment and Forestry, Directorate General of Waste Management, Hazardous Waste and Toxic Materials dated October 29, 2021, regarding directions for the permit process for storing hazardous and toxic waste.
- The company shows the direction of environmental documents No. S.1220/PDLUK/P25/PLA4/5/522 dated May 12, 2022 related to the extension of hazardous waste storage permit, explained in the document if there is no change in hazardous waste storage activities and facilities, the company can use the old environmental documents, the company is directed To take care of the hazardous Waste storage Permit extension online (Ministry of Environment website for integrated licensing online).
- The company has uploaded a number of documents required in the hazardous waste storage permit extension online to the Ministry of Environment website, integrated licensing online dated August 10, 2022 and until the Re-certification Audit takes place the company is still waiting for verification from the technical unit of the Ministry of Environment after that immediately receives the decree hazardous Waste storage Permit.

## 2.1.2

The Company has a mechanism to identify, implement and evaluate the compliance with the law described in "SOP Implementasi Undang-Undang dan Peraturan yang Berlaku" No. GPL/SOP/Umum-01, dated 7 August 2012. This procedure has explained the PIC who is responsible for identifying the regulation and the PIC which is responsible for evaluating the rules. Responsible person for updating the changes of regulations is Legal Manager and Sustainability & Certification Manager.

The company has an updated list of legality requirements updating July 2022 that exists in each unit. For example, there are several names of legal documents owned by the company such as HGU certificate, Business permit and Collective labor agreement. The updating of the latest regulations for example Regulation of the Minister of Agriculture Number 3 of 2022 dated 18 February 2022 concerning Development of Human Resources, Research and Development, Replanting, and Facilities and Infrastructure of Oil Palm Plantations. Based on interview with the contractor, evaluation of legal compliance for contracted third parties has been conducted on 8 March 2022. Result of evaluation is fulfillment related to aspects of OHS, employment, and environment to the contractor.

**2.1.3**

In order to implement the management of operational boundaries, the company also shows records of monitoring and management of HGU boundary markers and its condition. The auditor done field observations at poles for each estate, such as No. GPL-127, KOP-107, and KOP-001 it was known that the poles were in the company's HGU and bordered on community land. The auditor did not find any indication of investment outside the rights that have been granted to the company.

Based on the results of consultations with representatives of the people of Mapur Village dan Gunung Pelawan Village, information was obtained that there were no indications of cases of boundary violations or excess planting. Also from field visit to HGU stake No. GPL 692 and 164 in Gelam Estate, KOP 815 and KOP 280 in KKPA Gelam Estate, it is known that HGU boundaries are maintained and clearly visible and no indications of cases of boundary violations or excess planting.

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

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

**2.2.1; 2.2.2; and 2.2.3**

The company already has a list of contractors included in the stakeholder list. The list of contractors includes all third parties working with PT GPL such as hazardous waste transporter, contractors for CPO & PK, FFB transport contractors, contractors for building construction and others. The list of stakeholders informs the name of the agency, contact name, field of cooperation and contact number.

The company has shown examples of agreement with contractors and supplier that have contained clauses regarding legal compliance obligations, such as:

- Agreement for FFB and Loose fruit transporter No. GPL/GPE/01/2022/009-Angkut TBS & Brondol dated May 4 2022
- Agreement for FFB and Loose fruit transporter No. GPL/GME/07/2022/073-Angkut TBS & Brondol dated July 1, 2022.
- Agreement with FFB supplier No. GPL/HO/10/VII/2016-Jual Beli TBS (Addendum) dated July 27, 2022

In the agreements have been explained about:

- Obligation to provide social insurance (BPJS)
- Obligation to provide minimum wages
- Obligation to provide PPE for workers
- Obligation to comply with the provisions regarding OHS and the environment
- Prohibited from employing child labour, trafficked or forced labour

The company has shown documentation of legal compliance by the contractor, such as:

CV Tiara Mapur → with a total of 3 workers :

- Evidence of BPJS employment payment for September, paid on September 22, 2022
- Agreement Letter of worker with initial AG No. 003/SK-KRY-TM/10/2021 dated October 1, 2021
- Payslip on September 2022 for workers for example with initial AG. As for the wage is bigger than minimum wage.

The company also shows a contractor evaluation document that informs the name of the contractor and the evaluation results related to legal compliance such as worker age, PPE, Social insurance, minimum wages, etc.

Based on interview with contractors (such as CV Tiara Mapur), known that unit certification has socialized about obligation to comply with regulation. In addition, based on interview also known that contractor has paid wages based on minimum wage regulation and has involved employees in BPJS program.

<b>Status: Comply</b>
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**2.3**

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

**2.3.1 & 2.3.2**

The company receives FFB from others sources such as collecting agents (e.g. CV Multi Nusa Pratama, CV Cahaya Maras Abadi).

In receiving FFB from a third party, the company conducts a selection process by collecting information owned by the third party, such as: the location of collector, account number, and collector profile. The third-party information records are contained in the "Daftar Supplier TBS Tengkalat Mill Tahun 2021" document. For example, from the initial selection for PT Tandan Pratama with information on the coordinates of the collector location: Latitude 106.104333 & Longitude -2.14566. From the supplier list, there is also information on suppliers who send FFB to agents. The auditor conducted an interview with the agent (Hendra Gunawan), it is known that the agent is also committed not to accept FFB from illegal sources. Farmers who can sell FFB to agents are only farmers who already have valid information from the village regarding the origin of the land they own.

**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**  
PT Gunung Pelawan Lestari has a 5-year projection from 2021 - 2025. This projection contains FFB production for main estates and plasma plantations, processed FFB (including plans to purchase external FFB), OER and KER, production of CPO and PK, and levels of FFA. The company also has projected operational budgets for plantations, factories, and support.

The company's annual report is available in the Minutes of Management Review Meeting, dated August 29, 2022 which informs the discussion on the achievement of annual performance from monthly estate production and others. Evaluation of the achievement of the current year's budget has been carried out at the end of each year, as a material consideration in the preparation of the next year's budget.

**3.1.2**  
Based on the results of field visits and document studies, it is known that the oldest plant age was in 2006 and has not yet entered the replanting age, so the company does not have a replanting plan for the next 5 years.

**3.1.3**  
Management review towards plantation and operational activities had consistently conducted by the unit of certification periodically, as presented in several documents, for example as follows:

- Monthly Mill Manager Report.
- Monthly Estate Manager Report.
- Sustainability Internal Audit Report for RSPO period 2022. The audit is conducted on August 30, 2022.
- Internal Audit Operation period semester 1 2022. The audit is conducted on April 26-28, 2022

**Status: Comply**

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

**3.2.1**  
The certification unit already has a system to improve existing practices, in accordance with the latest information and techniques as well as a socialization mechanism for all workers following current technological developments. The unit of certification also develops guidelines for farmers by providing systematic training for continuous improvement. Some of the evidence that has been applied for continuous improvement include:

##### **Social and Environmental Aspect**

- 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 barn 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 energy accordance to reduce the use of fossil fuels.
- Waste management and monitoring through WWTP pond management, testing the quality of the effluent and reporting it to the

Environmental Agency.

- Air quality management and monitoring through several action like road maintenance, air quality testing, routine maintenance of vehicles and machines and vehicle upgrades.
- Management and monitoring of surface and groundwater through testing the quality standard.
- Green House Gas Management and using land clearing with mechanical and zero-burning policy.

#### **Best Management Practice and OHS Aspect**

- Carry out an inspection of the use of PPE to ensure that the PPE of employees has been used and in accordance with procedures.
- CH does not use chemicals with the active ingredient paraquat.

#### **Worker Welfare**

- Unit certification has set minimum wage regulations for all workers based on the stipulation of minimum wages by the Governor of Bangka Belitung for 2022.
- Unit certification facilitates workers with adequate housing, electricity facilities, and availability of clean water in every publicly available housing.
- Unit certification is also committed to avoiding acts of discrimination, sexual harassment, child labor or acts of human rights violations in the work environment.

#### **3.2.2**

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

**Status: Comply**

#### **3.3**

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

##### **3.3.1**

Plantation SOP has been indicated by the representative of the certification unit in the Guidebook for Technical Cultivation of PT Evans Indonesia. These documents include, among others, nursery, land clearing, planting oil palm, planting legumes, conserving water and soil, immature plants, controlling weeds, pests and diseases, maintaining productive crops, fertilizing, harvesting and transporting, vehicles and heavy equipment, replanting, water management, compost applications, PKS liquid waste applications. Example: Nursery SOP (AGR-SOP01-01), released on March 3, 2020, explaining the activities of the location requirements for nurseries, nurseries, to transport of seedlings.

The certification unit shows the SOP of the factory, including weighing, grading, processing at each station, up to the receipt and release of CPO. for example, grading SOP with document number SOP / 6.1 / 2, revision 1, dated January 1, 2017, with the approval of the Mill Manager.

The certification unit also shows the operational manual for plantation, mill and bulking safety with document number MNL / 4.1 / 2 revision 0, dated 31 October 2013. This manual contains safe work practice procedures for all operational activities of plantations, mills and bulking. Includes sufficient training, fulfillment of work equipment and equipment along with PPE, periodic health checks, and work risk mitigation.

#### **Field observation**

- Based on the results of field visits, for example grading activities at the mill, it is known that SOPs are available on site and understood by workers as evidenced by workers knowing the work process in the grading area, fruit sorting criteria and treatment of fruit that does not comply with the requirements for core, plasma and external fruit. .
- Based on the results of field visits at the Estate, for example Harvest activities and picking loose fruit at GPE and GME, it is also known that workers can explain the workings of harvesting to the preparation of pruning fronds and the procedure for quoting loose fruit and the criteria for ripe fruit.

##### **3.3.2**

To ensure consistency of procedures implementation, the company has a monitoring inspection mechanism that was carried out regularly through internal audit activities. An internal audit conducted twice a year or if needed which the scope of the inspection includes estate and mill operational activities. There are several types of audits that are conducted routinely by the company. For example:

- Sustainability Internal Audit Report for RSPO period 2022. The audit is conducted on August 30, 2022.
- Internal Audit Operation period semester 1 2022. The audit is conducted on April 11-28, 2022
- Harvest inspection activities to maintain harvest quality, namely for indicators of loose fruit, OHS, pruning (under / over).
- Inspection activities for detection and census of EWS for IPM every week.

Each unit has documented the operations of the estate and mill products such as daily reports, supervisor workbooks, etc. The field visit at the mill shows that the unit has been documenting the daily activities in a daily production report that documented by using computerized systems.

### 3.3.3

The company routinely evaluates management plans through internal and external audits. The company in this case shows the results of operational audit for estate and mills which was carried out on April 11-28, 2022. The objects being audited include:

1. Production and plants.
2. Estate and mill cash.
3. Personnel.
4. Division administration.
5. Palm oil mill.
6. Evaluation report.

All the results of the audit have been carried out with corrective efforts complemented by preventive measures so that similar incidents do not happen again in the future.

**Status: Comply**

### 3.4

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

#### 3.4.1; 3.4.3

The company has several documents related to social and environmental impact studies which are carried out independently and participatively by involving affected stakeholders. Some of the documents owned by the company include:

#### Environmental Aspect

The company already has environmental documents in the form of Amdal (Ka-Andal, Environmental Impact Analysis, RKL and RPL) covering an area of 17,000 hectares which was approved by the Head of Bapedalda of Bangka Belitung Province on April 2, 2008 with a capacity of 60 tons of FFB/hour. In 2014, the Company made an Amdal addendum (Andal, RKL, and RPL) related to the change in the location permit which was previously around 17,000 ha which was later changed to 13,565 ha with a factory capacity of 60 tons of FFB/hour and there was a change in the activity plan for the wastewater treatment system from a palm oil mill that is integrated with a biogas installation to be used as a renewable alternative source of electrical energy (PLTB) and the remaining effluent is used for land applications. The document has obtained environmental feasibility in accordance with the Decree of the Regent of Bangka no. 188.45/154.1/LH/2014 concerning Environmental Feasibility of Plantation and Coconut Processing Mill Activities (Addendum Andal and RKL-RPL) by PT Gunung Pelawan Lestari. In addition, the company has also obtained an environmental permit in accordance with the Decree of the Regent of Bangka No. 188.45.154.2/LH/2014 concerning environmental permits for plantation activities and palm oil processing factories in Silip Village and Mapur Village, Riau Silip District and in Gunung Muda Village and Gunung Pelawan Village. Belinyu District, Bangka Regency, Kepulauan Bangka Belitung Province, PT Gunung Pelawan Lestari.

Based on the results of interviews with the Environmental Service of Bangka Regency, it is known that the AMDAL document owned by the company is in accordance with the provisions of the legislation. The results of document verification show that the total area and operational activities of the company have been covered in the environmental documents owned.

#### Social Aspect



The company has PT GPL's Social Impact Assessment Report (SIA) conducted in April 2013 by Aksenta. The area being assessed by PT GPL's SIA is the PT GPL location permit area of 13,565 ha (including KKPA). SIA covers all aspects of livelihood, health, education, culture and religion etc. Consultation involving affected parties. Records showing evidence involving affected parties, including attendance on January 16, 2013 which was attended by 18 participants and a list of 69 participants. In the SIA document it is explained that the implementation method is carried out by interview, group discussion/FGD and observation. Based on interviews with village representatives, it is known that the SIA was prepared in a participatory manner and all existing social impacts have been identified by the company.

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. In addition, based on the results of interviews with representatives of Mapur Village and Gunung Pelawan Village, it is known that the social impacts of the existence of companies such as CSR and employment and these impacts have been covered in the SIA document.

The company has implemented social management and monitoring plans, such as:

- Socialization, Briefing, and Meeting of stakeholders and the community around the company.
- Provision of facilities for consultation and communication with stakeholders and the community around the company.
- Absorption of local workers by providing information on job vacancies in surrounding villages. Currently there are 1,034 local workers working in the company.
- CSR realization
- Dissemination of company policies, environment, employment and OHS to employees
- Formation and strengthening of trade unions among employees
- Provision of PPE to workers
- Housing construction and repair
- Health checks and social security facilities.
- Enclave area and ex mining area.

This evaluation activity is also a reference in the preparation of the Social Impact Management and Monitoring Plan Matrix for the period July 2022 – June 2025. Program planning is carried out based on the results of Focus Group Discussions with Gunung Muda village dated 2 November 2021, on Silip village dated 23 December 2021 and Gunung Pelawan village dated 19 December 2021. For internal stakeholder and 27 until 29 December 2021 carried out with stakeholders including the community. villages around the company as well as the results of the potential and risk analysis.

Based on the results of the verification of the document, social impacts have been identified by the company, all social management and monitoring plans that have been implemented and monitored are then updated periodically in a participatory manner to accommodate the aspirations of stakeholders. The results of the meeting included:

- Open new job opportunities, thereby reducing poverty levels by increasing the welfare of rural communities, especially in the trade sector with local purchases either from the Company or from company employees to meet their daily needs.
- There is outreach to village communities regarding the development of the oil palm plantation sector, especially community plantations.
- Improvement of the economy, especially in the field of commerce. Improve CSR programs and social assistance from the company to the village community.

Based on the explanation above, it can be concluded that the company has made efforts to update the social and environmental management program periodically with clear and accountable evidence.

The companies have been developing a comprehensive social management and monitoring plan by integrating between sections/departments covering all impacts and representative samples of the parties established.

Based on an interview via telephone with the Village Mapur and Gunung Muda Village known that SIA, management and monitoring plan has been conducted in an involved manner with affected Village with a Forum Group Discussion (FGD) and no issue raised by the community.

The company can also show a report on the implementation of HCV management activities for 2021 report, for example:

- Planting of *Ulin*, *Kapur*, *Hopea*, *Keruing* and *Jambu Hutan* on May 29, 2021 in the conservation area of the River Border *Kenden Besar Estate LK1*. The number of plants planted with *Ulin* species is 100 seeds, *Kapur* 3 seeds, *Hopea* 3 seeds, *Keruing* 4 seeds, and *Jambu Hutan* 20 seeds.
- Monitoring of the presence of animals during the period of July 2021 revealed that there were 463 individuals from 64 species of animals, for example such as *Monyet ekor panjang*, *Biawak*, *Tupai*, *Bubut besar*, *Kangkareng perut putih*, *Cucak Kuricang*, etc.
- Minutes of HCV socialization including the protection of the existence of animals and plants which were held on March 29, 2021, which were attended by 20 workers.
- Minutes of the socialization of HCV including the protection of the existence of animals and plants which were carried out on February 24, 2021, which were established by 18 workers.
- Maintenance of the Conservation Sign in May 2021 at Block III Estate LK 1.
- Security patrols in the HCV area from hunting, logging, and fires conducted in September 2021. The results of the activity revealed that there was no disturbance in the HCV area.

### 3.4.2

The implementation of environmental management has been carried out in accordance with all RKL-RPL documents and Environmental Permits owned by the company. The certification unit makes a report on the implementation of the RKL-RPL because the scope of certification for the Tengkalat POM matrix. Environmental management reports are carried out every 6 months and submitted to the relevant agencies, namely the Environmental Service of Bangka Regency, the last report was carried out on Juli 24, 2022 for the RKL-RPL Report for Semester 1 of 2022. Based on the 2014 Amdal Addendum document, there is an environmental management and monitoring plan that must be implemented by the company, namely:

- Decreasing Air Quality
- Smell Enhancement
- Increased noise intensity
- Increased explosion and fire potential
- Increased waste Hazardous and toxic materials
- Decline in surface water quality
- Improvement of soil quality/land productivity
- Decline in groundwater quality
- Decreasing Aquatic Biota
- Opening of job opportunities
- Changes in people's perceptions and attitudes
- Occupational safety and health (OHS) disturbances
- Public health problems.

The company unit has also evaluated every parameter of significant impact monitoring carried out as required in KepmenLH 45 of 2005, which includes evaluation of trends, evaluation of critical levels, and evaluation of compliance. Based on the results of the evaluation, it is known that there are several parameters that are not in accordance with the applicable Quality Standards, but the results of interviews, document analysis and observations there are no indications of environmental pollution in the area around the company, this is explained in each related indicator. The effectiveness of environmental management and monitoring can be seen from the results of the analysis and the compatibility between the management and monitoring plans and their implementation in the field. Several things can be concluded from the results of the review of the RKL-RPL document for Semester 1 of 2022, including:

- Decreasing Air Quality
- Smell Enhancement
- Increased noise intensity
- Increased explosion and fire potential
- Increased waste Hazardous and toxic materials
- Decline in surface water quality
- Improvement of soil quality/land productivity
- Decline in groundwater quality
- Decreasing Aquatic Biota



- Opening of job opportunities
- Changes in people's perceptions and attitudes
- Occupational safety and health (OHS) disturbances
- Public health problems.

This can also be proven from the results of field visits to EFB storage areas, WWTP areas and Land Application areas as well as river border conservation areas. The results of interviews with the community around the company also stated that they did not feel any environmental impacts related to the company's operational activities.

The unit of certification has also made an RKL-RPL report every semester which refers to the environmental management and monitoring matrix. Environmental management reports are carried out every 6 months and submitted to the relevant agencies, for example the 2022 RKL-RPL Report semester 1, which was sent to the Ministry of Forestry and Environment on 19 July 2022 through SIMPEL with ID TTE 1658191496-3765.

Based on the results of interviews with the Environment Agency regarding reporting on the implementation of the RKL-RPL, there were no complaints or conflicts related to environment from NGOs and local communities around the company.

### **Social Aspect**

The company already has an SIA management plan for the period July 2022 – June 2025 which was prepared in a participatory manner with the community around the company and the results of a review of the previous year's management plan (June 2019 – July 2022). Participatory activities were carried out by conducting FGDs with the surrounding community which were carried out by each Estate in June 2021 in Gunung Muda Village, Silip Village, Gunung Pelawan Village, gender committee, local NGO (*Pemuda Pancasila*) and Mapur Village and the results of the FGD were summarized. The SIA management plan for the period July 2022 – June 2025 is as follows:

- CSR
- Absorption of Local Labor
- Housing construction and repair
- Internships for local students
- Plasma Cooperative
- Medical Check Up for Workers
- Employee Health
- Employee PPE
- First aid kits on site
- OHS
- Stakeholder meetings, trade unions and communities around the company
- Monitoring the SIA Action Plan.
- Enclave area and ex mining area.

The company has monitored the enclave area in the scope of certification, to ensure the actual conditions in the area and the results show that some of them are in the form of oil palm, rubber, pepper plantations. The company has made a map of the land owners based on the identification results, obtained information that the Gelam plantation borders the community's oil palm plantations in division 4 there are 9 farmers who have areas bordering the company and in Tengkalat plantation 7 farmers. As a follow-up to the enclave area data collection, the company continues to coordinate with each land owner in an effort to avoid social conflicts. The company also provides advice regarding the prohibition of cutting down trees, burning land and prohibiting hunting for protected animals. The company also coordinates harvesting activities carried out by farmers who own land within the company's plantation areas and the security team recognizes and records each enclave land owner and prepares a harvesting schedule.

Based on the results of consultations with workers' representatives, there is no form of discrimination against workers, no underage workers were found, the company has also fulfilled the rights of its employees, several important facilities for employees have been provided by the company such as housing, water, electricity, places of worship, public facilities. educational infrastructure (schools),

and other facilities. The company also allocates resources for the maintenance of the entire facility. The resource persons also stated that they can voice their views through their own representative institution or a spokesperson they choose in the evaluation activities to review and develop mitigation plans, as well as monitor the success of the implemented plans.

Based on the results of the verification of PT GPL 2022 Social Impact Monitoring and Management document, it can be concluded that all activities listed in the 2021-2022 Social Impact Management and Monitoring Plan Matrix have been implemented. The company also conducts an internal evaluation of the SIA management activities annually to monitor the progress of program management, for example, there are programs that need to be stopped, continued or added. Regarding the follow-up of OFI at previous assessment, based on the results of the last FGD document review conducted, there are suggestions from people who own land around the company (enclave) related to entry access, security, and order in the company area, suggestions the company had responded to this during the FGD. In the SIA management plan for the period 2021-2022, there has been explained of the impact/issue from the enclave on the program.

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

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

##### 3.5.1

The company already has a human resource management system, which is contained in the following documents, as follows:

- SOP No. IDN-HRD-SOP01-01 dated on 01 February 2021 concerning Recruitment.
- SOP No. IDN-HRD-SOP03-01 dated on 01 February 2021 concerning The Structure of Job Class and Position.
- SOP No. IDN-HRD-SOP04-01 dated on 01 February 2021 concerning Remuneration.
- SOP No. IDN-HRD-SOP05-01 dated on 01 February 2021 concerning Employee's Appraisal.
- SOP No. IDN-HRD-SOP06-01 dated on 01 February 2021 concerning Promotion.

Company also has Collective Labor Agreement 2021-2023 that was ratified by Manpower Agency based on Letter No.KEP01/PKB/Dinakerperindag/2021 on March 03, 2021 which describes the human resource management system, such as :

- Recruitment of workers
- Mutation
- Work termination
- And others

##### 3.5.2

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

The company has shown a record of the implementation of employment procedures, for example:

##### Recruitment

- Recruitment documentation with the initials RGK such as job application letters, results of health checks, ID cards, Family card and others. Company has shown probation agreement for that worker with the probation period of 3 months No. 012/SK-(probation)/(Cemara Estate)/2022 on July, 1 2022. Company has also shown appointment letter for the worker with Decree No. 100/SK-SKU-H/CME/X/2022 on October 1, 2022.
- Recruitment documentation with the initials MDI such as job application letters, results of health checks, ID cards, Family card and others. Company has shown probation agreement for that worker with the probation period of 3 months No. 009/GPL-GPE/PBT/III/2022 on March, 1 2022. Company has also shown appointment letter for the worker with Decree No. 015/SK-SKU-H/GPL-GPE/2022 on June 2, 2022.

##### Promotion

- Grade promotions, for example workers with employee number 2015122263 are promoted from grade P1 to grade P2.
- Grade promotion, for example workers with employee number 2010020448 are promoted from SKUH grade to P1 grade.

The results of interviews with workers and representatives of labor union revealed that labor procedures have been implemented by

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

**Status: Comply**

### 3.6

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

**3.6.1**  
The company can show the results of the risk identification document and its implementation plan for all Estate and Mill, including scheme smallholder units contained in the Occupational Safety and Health Hazard Identification and Risk Assessment (HIRA) document dated October 7, 2022 for mill unit and November 3, 2022 for plantation unit. The document describes the following: Activity Stages; Description of activities; Type of activity; Identification of Potential Hazards (Potential Hazards; Types; Hazards); Current Controls (Types of Controls; Description of Controls); Legal; Risk Assessment (Probability; Severity; Outcome); Determination of Control (Conclusion; Program Code). Based on document verification, all activities identified have covered all activities in the plantation and factory of PT. Gunung Pelawan Lestari such as land preparation, nursery, oil palm planting, fertilization, immature plant maintenance, maintenance of productive plants, harvesting, transporting FFB, and supporting activities on the estate and activities at the Mill.

The implementation of identification of hazard sources and risk assessment can be seen in OHS warnings, appeals for the use of PPE in estate and factories as well as appeals for occupational safety and health at every morning meeting.

Based on site observation at boiler and engine room in Tengkalat POM, harvesting in Division 3 Block H47/48 and circle path spraying activity in Division 3 Block H51/52 Tengkalat Estate it was clearly confirmed that workers had been aware related potential risk and hazards in the work place. Following up on this, the company has been reducing the potential risk by routine socialization about OHS, providing PPE, and OHS signboard are available in workplace.

**3.6.2**  
The company can show evidence that it has carried out monitoring of the effectiveness of OHS to handle OHS risks in people including the following:

- The company can show records of OHS COMMITTEE meetings of all Estate and Mill units which are held once a month (more explanation in indicator 6.7.1)
- Medical Check Up (more explanation for special medical checkup in indicator 7.2.10). Regarding the follow-up of OFI at previous assessment, the company can provide a general medical checkup for all workers and a special medical checkup for certain jobs to be carried out on October, 2021 with the result fit to work for all worker.
- The company shows records of monitoring the condition of facilities and infrastructure for dealing with estate and mill emergencies.
- The company shows records of inspections of conditions and compliance with the use of PPE.
- Identification of areas with potential emergency hazards such as fire prone area, explosion, land / water pollution, and workplace accidents and the results of monitoring conducted every months.

**Status: Comply**

### 3.7

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

**3.7.1**  
The company showed the Training Program for each unit in 2022 that cover all aspects of the P&C RSPO. Based on interview with management, known that the training also covers parties who need training such as staff, workers, smallholder and contractors. As for sustainability and HR department are responsible for the development of the training program scheduling and implementation of training. The training program document informs type of training, plan / timetable and attendance. The 2022 training programs such as:

- Spraying Training
- Harvesting Training
- Manuring Training

- IPM Training
- Water Management Procedure Training
- Whistleblower system socialization
- Chemical Handling Training
- Loading Ramp Training
- FireFighting Training
- LSU Training
- Waste management training
- Etc

### 3.7.2.

The company already has training records, such as:

- Waste management training on June 2, 2022 which was attended by 40 participants.
- Emergency Response training on January 22, 2022 which was attended by 50 participants.
- IPM training on February 4, 2022 which was attended by 8 participants
- Manuring Training on February 3, 2022 which was attended by 11 participants.
- Spraying Training on February 2, 2022 which was attended by 9 participants
- Water management training on March 14, 2022
- LSU Training on June 28, 2022 which was attended by 48 participants
- Etc

As for some training records where appropriate on an individual basis

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

### 3.7.3

Certificate holder showed that they had properly documented every training activity and socialization that had been carried out to all workers, contractors, and related stakeholders. The training of SCCS had been conducted on 18, 21, and 27 September 2021 for security, weighbridge, grading, analysis and CPO dispatch operator. Based on interview with weighbridge operator and security, it is known that operator already understand the supply chain of Tengkalat POM. Weighbridge operator and security can explain the source of FFB which is from certified and uncertified source.

**Status: Comply**

## 3.8

### Supply Chain Requirements for Mills

#### 3.8.1 & 3.8.2

Based on document review of FFB Supplier List, company received FFB from certified and uncertified source. Thus, PT GPL applies the MB module.

#### 3.8.3

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

Product	Last Year Projected Certified Volume (Ton)	Actual production from Nov 2021 – Oct 2022 (Ton)	Projection certified volume (Ton) (12
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			months)
<b>FFB</b>	257,600	254,112.17	260,000
<b>CPO</b>	62,723	62,715.49	62,400
<b>PK</b>	15,344	15,234.23	14,300

Based on table above, there is overproduction of FFB, CSPO and CSPK. This is caused by the period of actual production is longer than the license production. The last year certified volume start from March 2022, however the actual production is taken from Nov 2021 – Oct 2022. If the actual production is calculated from March 2022, then there is no overproduction of certified product.

The actual production from March - October 2022 is:

FFB: 189,940.46 MT

CSPO: 44,700.39 MT

CSPK: 11,009.79 MT

### 3.8.4

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

- Member ID: RSPO\_PO 1000006652
- Member Name: Tengkalat Palm Oil Mill, PT Gunung Pelawan Lestari
- RSPO member number: 1-0027-06-000-00 (M.P. Evans Group PLC)
- Last license: CB98260

### 3.8.5

The company has a mechanism or procedure in the Standard Operating Procedure (IDN-SUS-SOP05-01, 25 January 2021). This procedure aims to explain in general terms the requirements regarding control system implemented to control certified palm products Roundtable on Sustainable Palm Oil (RSPO) throughout its supply chain, including material flows and claims regarding the product. Scope of the procedures are all activities related to supply chain, from FFB receiving, FFB process, administration recording, product claim, bulking traceability, palm trace usage, complain procedure, and training. The document also informs competent officers and their responsibilities, including:

- Head/Group Manager/Senior Manager: Overall responsibility for supervising the implementation of this procedure in all the regions he leads and ensuring that it does not conflict with company regulations.
- Administration Head: Reporting Mass Balance stock to the Marketing Dept. every week and reporting to the Mill Manager/GM/SM if there are deviations from this procedure.

The procedure already referred to latest SCCS standard (RSPO Supply Chain Certification Standard endorsed by the RSPO Board of Governors on 1 February 2020). The procedure also regulates abnormal conditions such as disturbances in the reporting system or errors in inputting recorded data.

### 3.8.6

The Procedure to conduct annual internal audit are describe in SOP Internal Audit Sustainability (IDN-SUS-SOP07-01) dated 22 June 2021 covering all audit for sustainable palm oil including SCCS. The scope of this SOP is all activities related to internal audit sustainability starting from the effectiveness of the RSPO, ISPO, SCCS and other certification systems that determined by companies operating in the plantation, Oil Palm, Bulking and the Dept. which is related in the work area of Evans Indonesia Group. In the SOP mentioned that internal audit is done annually, at least once a year. Internal audit of SCCS conforms to the requirements in the RSPO SCCS and the RSPO market communications and claims documents and effectively implements and maintains the standard requirements. Sustainability Department responsible for establish an Audit Programs for every year.

The latest RSPO supply chain internal audit conducted on 16 – 20 August 2022. All of supply chain standard and rules on market communication and claim has been assessed and there was 1 nonconformity related to supply chain and the nonconformance has comply.

Management Review of RSPO supply chain implementation has conducted on 29 August 2022. The management review has covered the discussion CAR of internal audit result, correction and corrective action.

**3.8.7**

Tengkalat Mill record FFB received from certified and noncertified source for 12 months (November 2021 – October 2022), below is the details:

Month	FFB Certified (ton)	FFB Un-certified (ton)
November 2021	15,614.57	7,144.51
December 2021	16,492.93	3,900.77
January 2022	16,998.30	2,280.37
February 2022	15,065.91	4,457.71
March 2022	22,293.16	6,884.27
April 2022	22,926.29	7,371.86
May 2022	25,083.46	2,168.17
June 2022	24,937.95	2,232.30
July 2022	25,290.85	1,083.36
August 2022	27,091.23	1,640.39
September 2022	22,789.33	9,371.79
October 2022	19,528.19	7,894.14
Total	254,112.17	56,429.64

There is overproduction of FFB. This is caused by the period of actual production is longer than the license production. The last year certified volume started from March 2022, however the actual production is taken from November 2021 – October 2022. If the actual production is calculated from March 2022, then there is no overproduction of certified product.

The actual production from March - October 2022 is:

FFB: 189,940.46 MT

Company also has mechanism for handling FFB and/or nonconforming documents which contained in SOP SCCS No. IDN-SUS-SOP05-01, 25 January 2021.

**3.8.8**

Based on document verification it is known that there's CSPK and CSPO transaction on licenses period. The company shows documentation of certified products, such delivery order and buyer contract. These documents describe the names and contacts of the buyers and sellers, delivery dates, product descriptions, quality, quantity, member ID, and others. For examples: Delivery order No. GPL-PK/DO/0922/0043 about product selling of CSPK to PT Wilmar Nabati Indonesia on 26 September 2022. This document informs about name and address of seller and buyer, product descriptions, quality, quantity, member ID, RSPO certificate number, unique identification number, etc.

**3.8.9; 3.8.10; 3.8.11**

CSPO transportation is handled by third party, namely PT Wana Ekabina Manunggal. Company showed the agreement with CSPO transporter in document No. GPL/THM/2016/01-PENGANGKUTAN CPO dated 21 September 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 ensure the purity of certified product delivered during the distribution, as well as the willingness to be observed by Certification Body to verify the compliance. Based on interview with representative of PT Wana Ekabina Manunggal, it is known that they are willing to be observed by Certification Body to verify the compliance.

There is no new contractor compared to previous audit. The contractor used by the Mill is the same as the previous assessment.

**3.8.12**

During assessment, Tengkalat POM has record of all CSPO and CSPK, as well as presented in the table bellows:

**Crude Palm Oil**

Month	CPO Production (MT)	CPO Delivery (MT)
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	Certified	Uncertified	Certified (Physical)	Other Scheme	Noncertified
Opening stock	2,707.19	233.08	-	-	-
Nov 21	3,541.93	1,610.90	3,200	2,500	500
Dec 21	3,843.67	912.68	1,002	0	1,902
<b>Subtotal 4Q</b>	<b>7,385.60</b>	<b>2,523.58</b>	<b>4,202</b>	<b>2,500</b>	<b>2,402</b>
Jan 22	4,255.09	564.310	1,600	2,500	1,500
Feb 22	3,667.22	1,068.647	2,901	3,000	0
Mar 22	5,350.72	1,640.102	2,001	3,000	901
<b>Subtotal 1Q</b>	<b>13,273.03</b>	<b>3,273.06</b>	<b>6,502</b>	<b>8,500</b>	<b>2,401</b>
Apr 22	5,393.60	1,729.49	2,000	3,000	900
May 22	5,939.68	513.85	2,000	0	900
Jun 22	5,845.44	518.78	2,900	0	2,502
<b>Subtotal 2Q</b>	<b>17,178.73</b>	<b>2,762.11</b>	<b>6,900</b>	<b>3,000</b>	<b>4,302</b>
Jul 22	6,077.04	252.69	5,800	0	0
Aug 22	6,570.93	373.49	6,200	0	3,000
Sept 22	5,235.56	2,109.08	3,000	0	3,000
<b>Subtotal 3Q</b>	<b>17,883.52</b>	<b>2,735.26</b>	<b>15,000</b>	<b>0</b>	<b>6,000</b>
Oct 22	4,287.42	1,751.44	2,900	5,900	0
<b>Total</b>	<b>62,715.49</b>	<b>13,278.53</b>	<b>35,504</b>	<b>19,900</b>	<b>15,105</b>

Based on table above, it is known that all certified product is sold from certified production. As for the sale of other scheme and conventional, company has it removed from certified stock

**Kernel Palm Oil**

Month	PK Production (MT)		PK Delivery (MT)		
	Certified	Uncertified	Certified (Physical)	Other Scheme	Noncertified
Opening stock	535.43	-323.97	-	-	-
Nov 21	851.61	386.67	600	0	0
Dec 21	935.49	221.96	600	0	0
<b>Subtotal 4Q</b>	<b>1,787.10</b>	<b>608.64</b>	<b>1,200</b>	<b>0</b>	<b>0</b>
Jan 22	1,065.35	138.42	2,050	0	400
Feb 22	836.57	246.75	452	0	-
Mar 22	1,330.03	424.08	1,155	0	400
<b>Subtotal 1Q</b>	<b>3,231.948</b>	<b>809.25</b>	<b>3,657</b>	<b>0</b>	<b>800</b>
Apr 22	1,355.97	444.12	1,143	0	583
May 22	1,417.21	121.86	1,350	0	95
Jun 22	1,437.40	130.60	1,850	0	213
<b>Subtotal 2Q</b>	<b>4,210.58</b>	<b>696.57</b>	<b>4,343</b>	<b>0</b>	<b>891</b>
Jul 22	1,499.33	62.085	1,450	0	-
Aug 22	1,614.21	93.400	400	0	209
Sept 22	1,310.62	531.37	3,050	0	-



<b>Subtotal 3Q</b>	<b>4,424.165</b>	<b>686.856</b>	<b>4,900</b>	<b>0</b>	<b>209</b>
Oct 22	1,045.02	436.39	1,300	0	0
<b>Total</b>	<b>15,234.24</b>	<b>2,913.74</b>	<b>15,400</b>	<b>0.00</b>	<b>1,900</b>

Based on table above, it is known that CSPK sold is bigger than CSPK production. The CSPK stock is (211.46) MT. However, based on interview with management Tengkalat POM is used 3 monthly basis so the stock of CSPK will be balanced again (positive stock) in the end of 3<sup>rd</sup> quarter of 2022 is 89.22 MT. In the beginning 4<sup>th</sup> quarter mass balance have negative stock as much as 165.76 MT and certified holder still have two others months to closed the negative stock.

### 3.8.13; 3.8.14

The OER and KER is made based on actual production of CPO and FFB processed. Based on production data from November 2021 – October 2022, the OER is 23.53% and KER 5.78%. The extraction rate is updated periodically every month based on actual production of CPO and PK and also FFB processed.

### 3.8.15

Based on interview and FFB receipt record verification, Tengkalat POM has applied MB module.

### 3.8.16

#### Shipping announcement

Company has made shipping announcement not more than 3 months after dispatch. For example:

- Shipping announcement No. TR-959a2cbf-f997 for CSPK MB selling contract No. GPL-PK/SC/0922/0042 amount 350 MT. This contract has been shipped on 30 September 2022 based on weighbridge ticket No. TGM/PK/WB09221290. Shipping announcement was created on 10 November 2022.
- Shipping announcement No. TR-95b0e415-be0c for CSPO MB selling contract No. GPL-CPO/SC/0822/0023 amount 3,000.17 MT. This contract has been shipped on 24 August 2022 based on weighbridge ticket No. TGM/CPO/WB08221635. Shipping announcement was created on 19 October 2022

#### Removed stock

Company has removed its certified stock for other scheme and conventional scheme. For example for license periode, CSPO has been removed as amount as 11,900 MT.

### 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

Company had a Policy concerning on Sustainability and Business Ethics. This policy applies to all operational areas of Evans Group Indonesia. The Group's subsidiaries, employees, contractors, consultants and group's guests are required to obey the policy. This policy is freely available on the Group's website and is regularly updated to reflect changes in regulations and standards. This policy deals with:

- Transparency and complaints
- Occupational health and safety
- Quality
- Anti-bribery and anti-corruption
- Responsibility of manpower (modern slavery, provision of a decent wage, affordable housing and food, sexual harassment, equality of opportunity and anti-discrimination, child labor, workers' cooperation)
- Worker rights (freedom of association, forced labor, reproductive rights)

The company also has a Policy on Sustainability of Local Communities dated October 2021 which explains prohibiting retaliation against human rights defenders.

Company is committed to act ethically and honestly in conducting business, implementing and enforcing effective system and controls to ensure there is no modern slavery within the Group or its suppliers or business partners. Company also committed to provide equal opportunities to all its workers, and prevent discrimination in the workplace, stated as follows:

- The Group will provide equal opportunities for all workers to obtain decent work and income and to develop their careers regardless of race, caste, nationality, ethnicity, religion, disability, gender, sexual orientation, trade union membership, politics, or age;
- The Group assigns all employees according to the expertise, appropriateness, ability, skills and experience of the individual, as well as the needs of the Group;
- The Group will not tolerate any discrimination based on sex, such as role restrictions, labeling, violence, intimidation and excessive workload;
- The Group will at all times comply with laws on discrimination in the process of termination of employment, terms and conditions of employment, wages and benefits, promotion and transfer opportunities, training, recruitment and reduction of workers.

The company has also shown documentation of socialization of company policies including human rights policies, such as:

- Socialization on February 22, 2022 which was attended participants from CME
- Socialization on January 19, 2022 which was attended participants from GPE
- Socialization on July 6, 2022 which was attended participants from contractor
- Etc

Based on interview with stakeholder such as government agencies, communities around, representatives of labor union, and workers known that there is no indication of human rights violation.

#### 4.1.2

Disallowance of violence or any intimidations stated on company's Policy concerning on Sustainability and Business Ethics. The policy explained that the group disallowance the physical abuse, forced labor, verbal abuse, intimidation, and harassment by the management or workers.

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

**Status: Comply**

#### 4.2

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

##### 4.2.1; 4.2.2

The company already has a mechanism for submitting complaints to both internal and external parties as outlined in several SOPs as follows:

- SOP No. HRD-SOP15-01 dated on 03 February 2020 concerning in handling any dispute. The policy explained activities of dispute identification, dispute analysis, dispute management planning, dispute handling implementation, monitoring, evaluation, and reporting.
- SOP No. GPL/SOP/Umum-02 dated on 04 September 2013 concerning in information transparency. The policy explained the company regulated in delivering information based on the principle of free prior and informed consent, namely the freedom of speech and no pressure from any party.
- SOP No. GPL/SOP/Umum-05 dated on 25 April 2013 concerning in handling internal and external complaints. The policy explained about the company's procedure of handling and documenting any complaints.

- Whistleblower system. It described that if there were any requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).

The results of interviews with management, obtained information that if there are complaints which resolution has not been found together, then the complainant can bring the compliance to the RSPO Complaints System.

Based on interview with management and verification of socialization procedure document, known that to ensure procedure has understood by affected party including illiterate party, procedure socialization conducted orally to stakeholder. As for, company has shown flowchart of complaints handling for internal and external complaints. In the flowchart explained that for illiterate party, complaints can submitted by orally and will be recorded by designated officer in the complaint logbook. Based on the explanation conclude that a procedure are in place to ensure the system is understood by the affected parties, including by illiterate parties.

The results of interviews with workers and labor union known that workers understand the grievance mechanism. Complaints can also be submitted to labor union. The results of interviews with contractors (Tiara Mapur) and representatives of surrounding villages (Mapur and Gunung Muda Village) indicated that the village and contractors had understood the grievance mechanism.

#### **4.2.3**

The Company has some complaints/grievance mechanism, as follows :

- SOP No. GPL/SOP/Umum-05 dated on 25 April 2013 concerning in handling internal and external complaints. In the SOP it is explained that the response process to complaints is carried out of 2 weeks by unit leader after the complaint is received and recorded. The document also explains if the complaints can't be solved by the company, it can be continued through legal channels.
- SOP No. HRD-SOP15-01 dated on 03 February 2020 concerning in handling any dispute. The policy explained activities of dispute identification, dispute analysis, dispute management planning, dispute handling implementation, monitoring, evaluation, and reporting. In the SOP, it is explained that the reporting party has the freedom to choose people or groups who can support and/or act as observers.

The company already has documentation of complaints. As for the complaints in last 1 year for example:

- Complaint from worker dated October 12, 2021 regarding damaged facilities of daycare and has been responded on October 14, 2021.
- Complaint from worker dated October 6, 2022 regarding damaged septic tank and has been responded on October 16, 2022.
- Complaint from worker dated August 8, 2022 regarding the installation of lighting in office areas and has been responded on August 19, 2022.

Based on verification of documentation of complaints, known that there is only internal complaints that submitted to the company and no complaints from external parties. Based on interview with internal stakeholder such as workers and labor union, known that all complaints has been responded by company. Based on interview with external stakeholder such as village representatives, government agency, previous land owner also known that there are no complaints to the company.

#### **4.2.4**

The Company has some complaints/grievance mechanism, as follows :

- SOP No. GPL/SOP/Umum-05 dated on 25 April 2013 concerning in handling internal and external complaints. In the SOP it is explained that the response process to complaints is carried out of 2 weeks by unit leader after the complaint is received and recorded. The document also explains if the complaints can't be solved by the company, it can be continued through legal channels.
- SOP No. HRD-SOP15-01 dated on 03 February 2020 concerning in handling any dispute. The policy explained activities of dispute identification, dispute analysis, dispute management planning, dispute handling implementation, monitoring, evaluation, and reporting. In the SOP, it is explained that the reporting party has the freedom to choose people or groups who can support and/or act as observers.

The results of interviews with workers and labor union known that workers understand the grievance mechanism. Complaints can also be submitted to labor union. The results of interviews with contractors (CV Tiara Mapur) and representatives of village around (Mapur and Gunung Muda Village) indicated that the village and contractors had understood the grievance mechanism.

Status: Comply

### 4.3

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

##### 4.3.1

The company has the following community cooperation development partnerships in order to contribute to local community development:

##### **Koperasi Perkebunan Kelapa Sawit Ikhtiar Sejahtera**

Cooperation agreement dated June 16, 2008 between the Plasma Farmers' Cooperative Ikhtiar Sejahtera and PT. Gunung Pelawan Lestari No. 001/KPPIS/SPK-GPL/VI/2008 or No. GPL/Plasma/KPP-IS/001/2008 is known to the Head of Gunung Pelawan Village, Belinyu Sub-district Head, Head of the Department of Industry, Trade, Cooperatives, Micro, Small and Medium Enterprises Bangka District, Head of the District Forestry and Plantation Service of Bangka, Bangka Regent for a period of up to 15 June 2038. The land used is under a location permit determined by the regent with the distribution of plasma (40%) and core (60%) located in Gunung Pelawan Village, Belinyu Sub-District, Bangka District, Kep. Bangka Belitung Province.

##### **Koperasi Perkebunan Kelapa Sawit Silip Lestari**

Cooperation agreement dated May 4, 2010 between Silip Lestari Cooperative and PT. Gunung Pelawan Lestari No. GPL/Plasma/K-SL/002/2010 is known to the Head of Silip Village, District of Riau Silip, Head of the Department of Industry, Trade, Cooperatives, Micro, Small and Medium Enterprises Bangka District, Head of the District Forestry and Plantation Service of Bangka for a period of up to 3 May 2037. The land used is under a location permit determined by the regent with the distribution of plasma (40%) and core (60%) located in Silip Village, Riau Silip Sub-District, Bangka District, Kep. Bangka Belitung Province.

##### **Koperasi Perkebunan Kelapa Sawit Mapur Mandiri**

Cooperation agreement dated January 11, 2011 between the oil palm cooperative Mapur Mandiri and PT. Gunung Pelawan Lestari No. 001/KPKS MM/SPK-GPL/I/2011 or No. GPL/Plasma/KPKS-MM/004/2011 is known to the head of Mapur Village, Riau Silip Sub-district Head, Head of the Department of Industry, Trade, Cooperatives, Micro, Small and Medium Enterprises of Bangka District, Head of the District Forestry and Plantation Service of Bangka, Regent of Bangka for a period of up to January 10, 2041. The land used is under a location permit determined by the regent with the distribution of plasma (40%) and core (60%) located in Mapur Village, Riau Silip Sub-District, Bangka District, Province of Kep. Bangka Belitung.

##### **Koperasi Perkebunan Kelapa Sawit Gunung Muda Sejahtera**

Cooperation agreement dated April 1, 2016 between the Gunung Muda Sejahtera Plasma Farmers' Cooperative and PT. Gunung Pelawan Lestari No. 001/KPKS-GMS/SPK-GPL/IV/2016 or No. GPL/Plasma/KPKS-GMS/001/IV/2016 is known to the Head of Gunung Muda Village, the Belinyu Sub-district Head, the Head of the Department of Industry, Trade, Cooperatives, Micro, Small and Medium Enterprises of Bangka District, Head of the District Forestry and Plantation Service of Bangka District, Regent of Bangka for a period of up to March 31, 2046. The land used is under a location permit determined by the regent with the distribution of plasma (40%) and core (60%) located in Gunung Muda Village, Belinyu Sub-District, Bangka District, Kep. Bangka Belitung Province.

In addition, the company also had work agreement with local community such as independent FFB supplier, contractor for operational activity in estate and mill, also other vendor for goods procurement in order to contribute to community development. For example:

- FFB supplier: CV Multi Nusa Pratama, CV Tandan Pratama, CV Berkah Abadi Utama dll.
- Contractor: CV Bangka Abadi Engineering, CV Pilar Tanggung Persada, CV Jaya Abadi, dll
- Vendor: Yung Tri Tunggal, Dunia Lampu, CV Jordan Jaya, dll

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

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**

During the latest assessment activity, there were no changes related to the land ownership documents owned by the company. legally the company owns 11,818.21 ha. Here are the details:

- HGB (land use title for building) of Palm Oil Mill with area 24.95 Ha.
- HGB (land use title for building) of road with area 1.37 Ha.
- HGU (land use title) of Ikhtiar Sejahtera Cooperative: 874.86 Ha
- HGU (land use title) of Mapur Mandiri Cooperative: 1,315.97 Ha.
- HGU (land use title) of Silip Lestari Cooperative: 264.76 Ha.
- HGU (land use title) of Gunung Muda Sejahtera Cooperative: 2,230.74 Ha
- HGU (land use title) of PT Gunung Pelawan Lestari (Own Estate): 7,105.56 Ha

Based on review of HGU Decree, as well as consultation with stakeholders, known that the land originally from state land and compensation from community land.

The company also has farmer member documents for each cooperative in the company that has been determined by the Bangka Regent, with the following details:

- Decree of the Regent of Bangka (No.: 188.45/1676/DINPERTAN/2017) regarding the amendment to the Decree of the Regent of Bangka No.: 188.45/875/HUTBUN/2010 concerning the Appointment of Farmers Participating in Plasma as Members of the Mapur Mandiri Oil Palm Plantation Cooperative in Mapur Village, Riau District Silip, Bangka Regency who informed that there were 466 plasma farmers on December 20, 2017.
- Decree of the Regent of Bangka (No.: 188.45/526/HUTBUN/2013) regarding the Amendment to the Decree of the Regent of Bangka No.: 188.45/296/Hutbun/2009 concerning the Appointment of Participant Plasma Farmers as Members of the Cooperative Ikhtiar Sejahtera for Oil Palm Plantations in Gunung Pelawan Village, District of Belinyu informed that there were 525 plasma farmers on August 23, 2013.
- Decree of the Regent of Bangka (No.: 188.45/944/DINPERTAN/2018) regarding the Amendment to the Decree of the Regent of Bangka No.: 188.45/480/HUTBUN/2010 concerning the Appointment of Smallholders Participating in Plasma as Members of the Silip Lestari Cooperative for Oil Palm Plantation in Silip Village, Riau Silip District, Bangka Regency who informed 227 plasma farmers on June 25, 2018.
- Decree of the Regent of Bangka (No.: 188.45/361/DINHUTBUN/2016) concerning the Appointment of Plasma Participant Farmers as Members of the Gunung Muda Sejahtera Oil Palm Plantation Cooperative, Gunung Muda Village, Belinyu District, Bangka Regency which informed 1169 plasma farmers on 20 January 2016.

Based on latest assessment, there's no change related to plasma members.

##### **4.4.2, 4.4.4, 4.4.5 & 4.4.6**

The company provides the example of latest land acquisition on September 2020 that followed FPIC procedures, or example there is evidence of settlement of a 4.8 Ha land dispute (previously owned by Ismael Lim) and 11.2 Ha land dispute (previously owned by Misrawi). The land acquisition records are accompanied by supporting documents, such as:

- Certificate of Compensation for Cultivated Land
- Letter of Release of Right to Cultivate on Cultivated Land.
- Location map.
- Details of the year of principal planting compensated by the company.
- Letter of identification of the previous land owner.
- The signature of the Head of Mapur Village as a witness

Based on interview with representative of Mapur Village and Gunung Muda Village, land acquisition has followed the FPIC procedure. The relevant information related to compensation and land acquisition has provide in appropriate forms and language. Also the community or previous land owner has represented in the negotiation process of land compensation payment process.



Moreover, the representative of Mapur Village and Gunung Muda Village also previous land owner has understand the process of FPIC, including company's commitment about CSR, scheme smallholder, and local recruitment. Company has agreement with associated smallholder, implement the CSR program, etc. This review also covered in monitoring and management plan of social impact assessment document.

### 4.4.3

Based on the HGU Decree and interview with management, the process of land acquisition until the granted of HGU has been in accordance with the law and with participatory mapping on cadastral mapping system conducted by Land Agency.

The Company has a boundary map completed with scale, number of boundary poles and coordinates issued by National Land Agency. Monitoring of boundary poles is conducting every six months based on the procedure SOP of Installation and Management of Boundary Stones (SOP/Umum-14 dated 7 August 2012).

**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

The company has identified and assessed the legal and customary rights listed in the AMDAL and SIA documents. Based on these documents, there are no legal rights or customary rights in the surrounding villages and in the operational area of PT GPL. In addition, based on the HGU decree, the company also found that there were no legal rights, customary rights and usufructuary rights in the PT GPL area.

#### 4.5.2, 4.5.3, 4.5.4,

Company did new planting after 2010 inside HGU area and the area has obtained from the community surround company. The previous land acquisition document has been verified, as well as consultation with previous land owner, known that the land acquisition has been conducted in FPIC manner, in accordance with SOP of Land Acquisition Procedure (No. GPL/SOP/Umum-27 Document dated 2 March 2016). The procedure has been disseminated to the community parties with appropriate forms and languages (*Bahasa Indonesia*). The process starts from identification and mapping followed by measurement and physical check of the field then The Operation Room Assistant (ORA) will negotiate the price witnessed by Village Officials. FPIC process also include environment and social impact assessment such as provision of food and water sources for villagers.

#### 4.5.5, 4.5.6, 4.5.7, 4.5.8

There is no new land clearing after 2018. Based on the HGU decree, it was stated that the company's area came from compensation with the surrounding community. In the minutes of committee B it is known that the community has understood the consequences of the HGU obtained by the plantation and agreed to give their land to the company.

**Status: Comply**

### 4.6

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

#### 4.6.1, 4.6.2, 4.6.3 & 4.6.4

There is no change from the previous assessment. The company has not carried out any new planting's activities.

The previous land acquisition document has been verified, as well as consultation with previous land owner, known that the land acquisition has been conducted in FPIC manner, in accordance with SOP of Land Acquisition Procedure (No. GPL/SOP/Umum-27 Document dated 2 March 2016). The procedure has been disseminated to the community parties with appropriate forms and languages (*Bahasa Indonesia*). The process starts from identification and mapping followed by measurement and physical check of the field then The Operation Room Assistant (ORA) will negotiate the price witnessed by Village Officials. The results of verification of compensation documents and interviews with the community show that the compensation process is carried out directly to the land owner and is given equal opportunity to both men and women, and land owners are given the freedom to release their land without



coercion. Company has showed the list of compensation recipient and from list is known that the recipient consist of men and women.

The company provides the example of latest land acquisition that followed FPIC procedures, or example there is evidence of settlement of a 4.8 Ha (previously owned by Ismael Lim) and 11.2 Ha (previously owned by Misrawi). The land acquisition records are accompanied by supporting documents, such as:

- Certificate of Compensation for Cultivated Land
- Letter of Release of Right to Cultivate on Cultivated Land.
- Location map.
- Details of the year of principal planting compensated by the company.
- Letter of identification of the previous land owner.
- The signature of the Head of Mapur Village as a witness

Based on interview with representative of Mapur Village and Gunung Muda Village, land acquisition has followed the FPIC procedure.

Status: Comply

#### 4.7

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

##### 4.7.1, 4.7.2, 4.7.3

The company conducted compensation for area inside HGU, there is no new planting area or new land clearing outside HGU. The previous land acquisition document has been verified, as well as consultation with previous land owner, known that the land acquisition has been conducted in FPIC manner, in accordance with SOP of Land Acquisition Procedure (No. GPL/SOP/Umum-27 Document dated 2 March 2016). The procedure has been disseminated to the community parties with appropriate forms and languages (*Bahasa Indonesia*). The process starts from identification and mapping followed by measurement and physical check of the field then The Operation Room Assistant (ORA) will negotiate the price witnessed by Village Officials.

Based on interview with representative of Mapur Village and Gunung Muda Village, it was known that the community benefited from the company in the form of CSR activities. In addition, according to the previous explanation, the company also has a established scheme smallholder

Status: Comply

#### 4.8

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

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

The procedure for identifying legal, customary or user rights, and also for identifying people entitled to compensation and determining calculation method to provide fair compensation has been set in SOP of Land Acquisition (No. GPL/SOP/Umum-27, dated 2 March 2016). The procedure also contains the FPIC mechanism describes that identification of participatory map related to legal ownership of communities are considering gender, community leader, local or transmigrant communities, ethnic groups or communal land ownership, etc. It was communicated to related parties such as community leaders, and religious figures and youth leaders. The Evidence of Procedure Awareness was documented.

Others area in basic info is reserve area which means area that can be used as planted area. Based on area statement, there is no indication of land dispute. Based on HGU decree also known that the HGU area is obtained from compensation with the surrounding community and there is no land conflict. The same thing also said based on consultation public with previous land owner, representative of Mapur and Gunung Muda Village, and representative of Land National Agency, there's no issue related to land conflict. Moreover for land acquisition, company provides the example of latest land acquisition (in 2020) that followed FPIC procedures, or example there is evidence of settlement of a 4.8 Ha (previously owned by Ismael Lim) and 11.2 Ha (previously owned by Misrawi). The land acquisition records are accompanied by supporting documents, such as:

- Certificate of Compensation for Cultivated Land
- Letter of Release of Right to Cultivate on Cultivated Land.

- Location map.
- Details of the year of principal planting compensated by the company.
- Letter of identification of the previous land owner.
- The signature of the Head of Mapur Village as a witness

**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**  
Related to scheme smallholder FFB purchase, the Company has shown document of the Results of the Team Meeting for the Determination of Purchase Prices of Palm Oil FFB Production Sales of Planters in the Kepulauan Bangka Belitung Province in September 2022. The company made a payment to the plasma party referring to the minutes.

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

Based on interviews with Scheme smallholders and independent FFB suppliers, the FFB prices every once a month. The price information is available for them to inform What up group media and FFB prices signboard on Mill or monthly meeting.

**5.1.2; 5.1.3; 5.1.4; 5.1.5; 5.1.6; 5.1.8**

Based on document review, there's no FFB purchase on company business unit (on this indicator apply scheme and independent smallholders). The company shows several proofs of payments to local contractors or vendors, for example payments to collectors on behalf of CV Tandan Pratama and on behalf of Suhendra Gunawan for period dated 27-30 September 2022. The payment records contain completeness such as the extent of the work, minutes, to proof of payment via bank transfer. The payment records already match with price determined and informed by company and third parties' agreement. Based on the results of the FFB verification data supplier any the women's representative on the list FFB supplier.

**5.1.7**  
The company showing certificate test result number 510.3/161/SKHP-BM/DISNAKERPERINDAG/IX/2022 dated 22 September 2022 with a validity period until 20 September 2023 for weighbridges type ZM 510, with serial number 204951454 and number 510.3/162/SKHP-BM/DISNAKERPERINDAG/IX/2022 for weighbridges type ZM 510, with serial number 204951474 dated 22 September 2022 with a validity period until 20 September 2023 by Department of Manpower, Industry and Trade of Bangka Regency. The third party stated the test results, "Legal on Re-Calibration according to the law of Republic Indonesia No. 2 of 1981 concerning Legal Metrology by stamped the legalize mark for the year 2022".

**5.1.9**  
The company has had SOP of Internal and External Complaint that (No. GPL/SOP/Umum-05 revision 00 dated 7 August 2012). The purpose of the SOP is to complete every internal and external complaint both quickly and well and to create a safe and prosperous atmosphere within the company and surrounding communities. In the SOP it explains objectives, responsibilities, procedures, documentation and exceptions. The period year 2022 of complaint settlement is 2 weeks for each part. Based on document review of complaint book, there is no complaint from contractor or vendors.

**Status: Comply**
**5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.**
**5.2.1; 5.2.2; 5.2.3**

The company has consulted with smallholders to assess their interest in pursuing RSPO certification. The company can show the

minutes of RSPO socialization to Perkumpulan Petani Swadaya Bangka Lestari on 13 December 2019 in Banyu Asin Village to 43 independent smallholders. The materials carried out are as follows:

- Data on the legality of smallholders' plantations and technical guidance on oil palm cultivation
- RSPO on environment and OSH
- Technical Agronomy and Manuring, harvest preparation, Weeding and weeds and Pest and disease.

The results of interviews with company representatives revealed that Independent Smallholders assisted by the company, namely Perkumpulan Petani Swadaya Bangka Lestari, have obtained RSPO certification in 2021 for the Eligibility Phase. The number of farmers who have participated in the RSPO certification is 208 Smallholders, with details of 189 male farmers and 19 female farmers. Meanwhile, plasma farmers (full managed) have followed the RSPO certification and are the supply base of PT Gunung Pelawan Lestari.

#### 5.2.4

The company has conducted pesticide handling training for Plasma Smallholders and independent smallholders which was conducted on 04 April 2021 until 31 January 2022 to 209 plasma farmers and independent smallholders. The socialization materials provided are as follows:

- Active ingredients in the use of environmentally friendly pesticides.
- Benefit income, HCV, manpower and FFB production record.
- Socialization to collect hazardous and toxic waste in one place.
- Information on the classification of chemically active ingredients.

Based on this explanation, it can be concluded that the company has conducted training on handling pesticides to plasma farmers and independent smallholders.

#### 5.2.5

The company has publicly reported the progress of the support program to farmers through the MP Evans Group website, namely mpevans.co.uk (Scheme smallholder co-operatives). Data on the Development of ISH Programs Uploaded to the Website in ISH personal In charge by PT Gunung Pelawan Lestari (community development).

Base on document verification report on the progress of the plantation business for the third quarter of 2022 which was submitted to the Agriculture and Food Security Service of the Kepulauan Bangka Belitung Province and to the Food and Agriculture Service of Bangka Regency on 24 October 2022 has been explained scheme smallholder program related production, hectare statement, yield, looses FFB, and profit.

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

#### 6.1

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

##### 6.1.1; 6.1.2

Company has had a Policy Concerning on Sustainability and Business Ethics. This policy applies to all operational areas of Evans Group Indonesia. The Group's subsidiaries, employees, contractors, consultants and group's guests are required to obey the policy. The Group aims to provide fair and equal opportunities to all its workers. The company seeks to prevent discrimination in the workplace, stated specifically as follows :

- The Group provides equal opportunities for every worker to get a job and earn a decent income, as well as get career opportunities, regardless of all forms of discrimination, namely: race, caste, nationality, ethnicity, religion, disability, gender, sexual orientation, union membership political affiliation and age.
- The Group assigns each workforce according to their skills, abilities, work experience and business and operational needs.
- The Group will not tolerate any discrimination based on sex such as role restrictions, labeling, violence, intimidation and excessive workload.
- The Group will at all times comply with laws on discrimination in the process of termination of employment, terms and conditions

of employment, wages and benefits, promotion and transfer opportunities, training, recruitment and reduction of workers.

The company has also shown documentation of socialization of company policies including nondiscrimination policies, such as:

- Socialization on February 22, 2022 which was attended participants from CME
- Socialization on January 19, 2022 which was attended participants from GPE
- Socialization on July 6, 2022 which was attended participants from contractor
- Etc

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

The results of the verification of employment documents, the results of interviews with workers and representatives of labor unions, it is known that the existing worker in the company consists of permanent workers and temporary worker who are recruited directly by the company without going through a third party. There is no retention of workers' documents and no recruitment fee. From the results of interviews with representatives of surrounding villages, it is also known that the company also conveys information on job vacancies to the village.

#### **6.1.3**

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

The company has shown a record of the implementation of employment procedures, for example:

##### **Recruitment**

- Recruitment documentation with the initials RGK such as job application letters, results of health checks, ID cards, Family card and others. Company has shown probation agreement for that worker with the probation period of 3 months No. 012/SK-(probation)/(Cemara Estate)/2022 on July, 1 2022. Company has also shown appointment letter for the worker with Decree No. 100/SK-SKU-H/CME/X/2022 on October 1, 2022.
- Recruitment documentation with the initials MDI such as job application letters, results of health checks, ID cards, Family card and others. Company has shown probation agreement for that worker with the probation period of 3 months No. 009/GPL-GPE/PBT/III/2022 on March, 1 2022. Company has also shown appointment letter for the worker with Decree No. 015/SK-SKU-H/GPL-GPE/2022 on June 2, 2022.

##### **Promotion**

- Promotion of grade, for example, worker with ID 2015122263 was promoted from grade P1 to grade P2.
- Promotion of grade, for example, worker with ID 2010020448 was promoted from the grade SKU-H to the grade P1.

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

#### **6.1.4**

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

#### **6.1.5**

The company already has a gender committee to deal with women's or gender issues. The gender committee structure consists of a coach, head of gender committee, empowerment sector, service sector etc. The structure of the gender committee also includes

representatives of female and male worker. For example structure of Gender Committee in GME year 2022 with head name is Melwani

The work program of the gender committee consists of:

- Conducting outreach/socialization related to the gender committee
- Socialization related to right and obligation of female worker
- *Posyandu*
- And others.

The results of interviews with female workers known that the workers already know the gender committee and the functions of the organization. Workers are also aware of gender committee if there are complaints or complaints related to women's problems or issues. The results of interviews with representatives of women's committee and women workers, it was found that there were no complaints related to sexual harassment, violation etc in the last 1 year.

#### 6.1.6

The determination of wages at PT Gunung Pelawan Lestari is based The Decree of the Governor of Bangka Belitung Island No. 188.44/1009/Disnaker/2021 dated November 15, 2021 concerning the Minimum Wage of Bangka Belitung Island Province in 2022 which is Rp. 3,264,884.

The results of interviews and the verification of workers' wages e.g manuring woker with worker ID 2015020429 and ID 2015070457 (worker with same work and same grade), it is known that the company has given the same wages for the same scope of work and in the same grade.

Status: Comply

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

#### 6.2.1

Determination of wages that apply at PT GPL based on the Decree of the Governor of the Kepulauan Bangka Belitung No. 188.44/1009/Disnaker/2021 dated 19 November 2021 concerning Determination of the Minimum Wage for the Kepulauan Bangka Belitung Province for 2022. As for the applicable minimum wage is Rp. 3,264,884. Regarding the determination of wages at PT GPL, the company showed a Decree regarding the determination of wages, including:

- Decree No.010/SK.Upah/GPL-HR/XII/2021 dated 24 December 2021 concerning Determination of Wages for SKUH 2022
- Decree No.011/SK.Upah/GPL-HR/XII/2021 dated 24 December 2021 concerning Determination of monthly employee wages and contracts for 2022 including wages scale

#### 6.2.2

The company already has a Collective Labor Agreement for 2021-2023 which has been registered with the relevant agency based on the Decree of the Head of the Bangka Regency Manpower, Industry and Trade Office No. KEP 01/PKB/Dinakerperindag/2021 dated 3 March 2021 concerning Registration of the Collective Labor Agreement between PT GPL and the GPL Mandiri Workers' Union. The CLA has regulated wages and work conditions, for example working time, wages, absenteeism, overtime, premiums, holidays and others.

For temporary workers, the document that regulates the details of wages and work conditions is contained in the temporary workers Agreement. For example, agreement No. 002/GPL-TGM/PKWT/05/2022/002 dated 1 May 2022 for park upkeep work (valid until 30 April 2023). The agreement has also explained the duties and responsibilities of workers, working time, wages, social security, facilities and others. The agreement has been registered at the Bangka Regency Manpower Office with registration number 04/PKWT/Disnakerperindag/2022 dated June 13, 2022.

The company has also socialized the CLA to workers. For example :

- Minutes of the socialization of CLA on June 4, 2022 at CME
- Minutes of the socialization of CLA on September 5, 2022 at GME
- Minutes of the socialization of CLA on May 30, 2022 at GPE



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

- CME → 436 workers
- GME → 436 workers
- GPE → 411 workers
- TGE → 505 workers
- TGM → 138 workers
- Contractor workers for example CV Tiara Mapur (FFB transporter) → 3 workers

The auditor team has simulated the calculation of workers' wages by verifying payroll documents for example on October 2022. For example workers with ID 2022069317 and ID 2015070457. From the verification results, it is known that the company has paid wages according to the applicable regulations. In addition, the company also shows payroll documents that provide information related to compensation for all work performance. Based on interview with workers and labor union representatives known that company has paid wages is accordance with applicable regulation.

### 6.2.3

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

- Payroll documentation that gives information on compensation for work performance. The results of the simulation of wages and overtime in September 2022 for example with worker ID 2016032312, known that the company has paid overtime wages according to the workers' overtime hours and has complied with the applicable regulations.
- Payslip document has informed deductions, working days, leave and others. For example, workers with ID 2013101784 in August 2022, have 2 days absent, 24 working days and 5 holidays
- Employee leave forms, such as:
  - Annual leave form with worker initial LY on August 6, 2022
  - Maternity leave form with worker initial IK on September 16, 2022

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

Moreover, the company can show a letter of agreement due to retirement, No. 006/SPB/GPL-GPE/XII/2021 dated 20 December 2021 which was signed by management and employee representatives. Companies can also show pension calculations, proof of payment and other related documents.

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

### 6.2.4

The results of field observations in housing areas and interviews with workers and labor union known that the company has provided housing facilities (1 house consists of 2 bedrooms and 1 bathroom), infrastructure and facilities that are decent/in good condition to workers such as houses, clean water facilities, religious facilities, sports, school bus, clinic and others. The condition of the house is permanent and has good sanitation. From the interview, also known that in each housing location there are child care areas, trash bins, electrical and others.

### 6.2.5

The results of interviews with employees and labor union, known that there are sellers of foodstuffs especially for vegetables and side dishes that enter the plantation area on a regular basis. The company also provides an employee cooperative that provides workers'



daily needs including food. Based on the results of interviews with residents of housing and workers, it was stated that workers had obtaining adequate food sources at competitive prices.

#### 6.2.6

The determination of wages at PT Gunung Pelawan Lestari is based The Decree of the Governor of Bangka Belitung Island No. 188.44/1009/Disnaker/2021 dated November 15, 2021 concerning the Minimum Wage of Bangka Belitung Island Province in 2022 which is Rp. 3,264,884.

In relation to DLW (Decent Living Wage), the company has tried to do Prevailing Wage calculations for each unit, which included samples of In-Kind Benefits, such as Housing, electricity for home, water, education, etc. As for the amount of Prevailing wage is Rp. 3,648,359. DLW calculation is based on actual and rational price at certification unit location.

#### 6.2.7

Based on the results of verification of employment documents, interviews with management and labor unions and field observations, it is known that workers for the main jobs such as harvesting and factory operations, have been carried out by permanent workers. For contract workers/temporary work agreement (PKWT) who are recruited directly by the company to carry out supporting activities (park upkeep). There are only 2 temporary workers at unit certification. As for all temporary workers have been registered with the Bangka District Manpower Office on June 13, 2022 based on record number 05/PKWT/Disnakerperindag/2022.

Status: Comply

#### 6.3

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

##### 6.3.1; 6.3.2; 6.3.3

Company has had a Policy Concerning on Sustainability and Business Ethics which available in bahasa. This policy applies to all operational areas of Evans Group Indonesia. The Group's subsidiaries, employees, contractors, consultants and group's guests are required to obey the policy. It stated that the group respects workers' rights to freedom of association and association with other individuals and collectively expresses, encourages, pursues and defends the common interest. It specifically explained:

- The Group provides opportunities for all workers to establish free, open, independent, democratic and responsible trade unions and to register these unions with the relevant legal authorities
- The group gives all workers the option to become union members or not without coercion from any party
- The Group recognizes employees' rights to freedom of association and assembly

The company has also shown documentation of socialization of company policies including freedom of association policies, such as:

- Socialization on February 22, 2022 which was attended participants from CME
- Socialization on January 19, 2022 which was attended participants from GPE
- Socialization on July 6, 2022 which was attended participants from contractor
- Etc

The results of interviews with workers such as harvesters, factory workers and others, known that the company has provided socialization related to freedom of association. From the results of interviews with workers, known that there is labor union in the company. The Labor Union of PT GPL has been registered at the Manpower Office of Bangka Regency with record number 001/SPGLM/VI/2013 on June 27, 2013.

The company shows several records of labor union meetings, such as:

- Minutes of meeting on March 23, 2022 attended by 15 participants.
- Minutes of meeting on July 29, 2022.

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

	<b>Status: Comply</b>	
<b>6.4</b> <b>Children are not employed or exploited.</b>		
<b>6.4.1; 6.4.2; 6.4.3; 6.4.4</b> <p>The company has a policy on Sustainability and Business Ethics in July 2019 which among other things explains the prohibition of child labour, namely:</p> <ul style="list-style-type: none"> <li>• The Group prohibits the use of child labor in all of its own operations and by its suppliers;</li> <li>• The minimum age to work for the Group is 18 years, unless the job is part of the school curriculum</li> <li>• The Group permits the employment of persons aged 14-17 only if this is approved by the statutory authority and forms part of the school curriculum, or their participation in a vocational orientation certification or training program</li> <li>• Contractors, contract workers and volunteers working with the Group are subject to the Group's minimum age limit.</li> <li>• The Group will provide access to school, or transportation to school, for employees' children under 18 years of age.</li> </ul> <p>The company has also shown documentation of socialization of company policies including prohibition on employing children under 18 years old, forced labor and workers from human trafficking, such as:</p> <ul style="list-style-type: none"> <li>• Socialization on February 22, 2022 which was attended participants from CME</li> <li>• Socialization on January 19, 2022 which was attended participants from GPE</li> <li>• Socialization on July 6, 2022 which was attended participants from contractor</li> <li>• Etc</li> </ul> <p>The company has also shown agreement with contractors that have explained the prohibition on employing children under 18 years of age, forced labor and workers from human trafficking, for example Agreement for FFB and Loose fruit transporter No. GPL/GME/07/2022/073-Angkut TBS &amp; Brondol dated July 1, 2022 and Agreement with FFB supplier No. GPL/HO/10/VII/2016-Jual Beli TBS (Addendum) dated July 27, 2022</p> <p>The results of the verification of the labor list document, interviews with internal and external stakeholders, and field observations revealed that there was no indication of any workers under the age of 18.</p>		
	<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; 6.5.2</b> <p>Company had a Policy Concerning on Sustainability and Business Ethics. This policy applies to all operational areas of Evans Group Indonesia. The Group's subsidiaries, employees, contractors, consultants and group's guests are required to obey the policy. It stated that sexual harassment is unwanted sexual behavior that violates a person's dignity so that the person feels intimidated, humiliated or humiliated, or creates enmity and environmental unrest. The Group is deeply committed to creating and maintaining a work environment free of sexual harassment.</p> <ul style="list-style-type: none"> <li>• The Group will carefully investigate every case of sexual harassment in its operational activities that are reported to it;</li> <li>• The Group will submit a reasonable sexual harassment case to the appropriate authority for legal action; if proven, his party will take firm action, such as termination of employment against employees who are found guilty of this violation.</li> </ul> <p>The Group will protect women's reproductive rights according to the laws of the countries where they work, specifically stated as follows:</p> <ul style="list-style-type: none"> <li>• The Group will provide special dispensation to female workers who suffer from menstrual pain, who are pregnant or breastfeeding in accordance with the rules and regulations of the country where they work;</li> <li>• The Group will provide guidance and education on reproductive health and fertility to workers and their families with the help of professional medical staff;</li> <li>• The Group will not allow pregnant employees to perform high-risk work that threatens the safety of the mother and / or child, such as lifting heavy loads, operating heavy equipment and handling chemicals such as pesticides, herbicides, fertilizers and laboratory chemicals;</li> <li>• The group will assign pregnant employees to suitable temporary jobs; it will not use employees' reproductive rights such as</li> </ul>		

pregnancy, childbirth, miscarriage, breastfeeding and other reproductive conditions, as a reason for demotion or termination of employment.

The company has also shown documentation of socialization of company, such as:

- Socialization on February 22, 2022 which was attended participants from CME
- Socialization on January 19, 2022 which was attended participants from GPE
- Socialization on July 6, 2022 which was attended participants from contractor
- Etc

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

### 6.5.3

The company has identified the needs of new mothers in 2022. The needs of new mothers based on the identification results are as follows:

- The company provides a place for mothers to breastfeed
- The company provides opportunities/time for mothers to breastfeed to be able to give exclusive breastfeeding

Based on interview with gender committee and female worker known that company has given permission to new mother to breastfeed. Beside that, based on observation at daycare in housing complex, known that company has provided special room for mothers to breastfeed.

### 6.5.4

The company already has a mechanism for submitting complaints to both internal and external parties as outlined in several SOPs as follows:

- SOP No. HRD-SOP15-01 dated on 03 February 2020 concerning in handling any dispute. The policy explained activities of dispute identification, dispute analysis, dispute management planning, dispute handling implementation, monitoring, evaluation, and reporting.
- SOP No. GPL/SOP/Uumum-02 dated on 04 September 2013 concerning in information transparency. The policy explained the company regulated in delivering information based on the principle of free prior and informed consent, namely the freedom of speech and no pressure from any party.
- SOP No. GPL/SOP/Uumum-05 dated on 25 April 2013 concerning in handling internal and external complaints. The policy explained about the company's procedure of handling and documenting any complaints.
- Whistleblower system. It described that if there were any requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).

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

	<b>Status: Comply</b>	
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## 6.6

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

### 6.6.1; 6.6.2

The results of the verification of the labor register documents, work agreement documents, interviews with labor unions, workers, and the Manpower Office revealed that there were no casual daily workers in the company. There are only permanent workers and temporary workers/ PKWT (for park upkeep) at PT GPL. From the results of interviews with workers, known that there is no forced labor in the company. All workers who work are in accordance with the mutually agreed agreement or letter of appointment.

For contract workers/temporary work agreement (PKWT) who are recruited directly by the company to carry out supporting activities (park upkeep). There are only 2 temporary workers at unit certification. As for all temporary workers have been registered with the Bangka District Manpower Office on June 13, 2022 based on record number 05/PKWT/Disnakerperindag/2022.

Based on verification in temporary agreement, known that the agreement has explained several working conditions, rights and obligations of workers such as working time, wages, social security, facilities and others. The agreement has been signed by both parties. From the results of interviews with workers and representatives of workers through labour unions, it is known that the company has provided a copy of the agreement to the workers. Based on interview with workers and labor union and employment document verification known that workers accept work voluntarily and freely, and following are not found during audit such as retention identity, recruitment fees, involuntarily overtime, lack of freedom to resigns, penalty for termination, debt bondage, withholding wages.

<b>Status: Comply</b>
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## 6.7

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

### 6.7.1

There is change in the OHS structure from previously there was a OHS structure for each estate and mill to a single structure covering all estates and mill. The company already has a OHS structure for the Estate and Mill units as the person in charge of occupational safety and health (OHS). The company can show the arrangement of the OHS structure for the Mill and Estate units, namely The OHS structure of PT Gunung Pelawan Lestari which has been ratified in accordance with the Decree of the Head of Manpower Agency of the Bangka Belitung Province, Number 188.4/018/P2K3/DISNAKER/2022 on 29 July 2022. Structure P2K3 consists of the Chairman, Secretary, and member (coordinator) from each estate. The OHS committee's secretary namely Andika Riyai who is a General OHS Expert. The company can show the OHS Expert Authority card, certificate, and Letter of Appointment of General Occupational Safety and Health Expert with Number KEP. 5/113444/AS.01.03/IX/2022 on September 28, 2022 with a validity period of 3 years. The results of the document review revealed that the authority card, certificate, and General OHS Expert SKP of OHS committee's secretary valid until September 28, 2024.

Companies can show records of P2K3 meetings with workers, for example OHS Meeting held on October 10, 2022. The topics discussed accident statistics, land fire control, PPE, internal MCU, inspection of Fire Extinguisher and OHS, OHS Structure Change Plan, etc. OHS meeting attended by 13 participants.

### 6.7.2

The company has procedures related to preparedness and emergency response numbers which are contained in the document: GPL/SOP/Umm-10 dated August 7, 2012 concerning Emergency Management which briefly describes the handling of emergencies (Mill, housing, office and warehouse fires; land and forest; Explosions; Natural Disasters; Riots; Exposed to chemical hazards; Accidents of leakage and spillage of waste; and other emergencies).

There are workers assigned to the field and other work locations and have received First Aid Training, for example: Adlin R. Simangunsong, Ser No. 5/37608/AS.02.02/XII/2021 dated December 31, 2021. Based on the results of the field visit at the Mill and Estate, it is known that the company already has a first aid kit in good condition and monitoring its adequacy in accordance with the laws and regulations.

### 6.7.3

Based on the results of field visits and interviews with workers (harvester, pesticide applicator and mill operators) in the Tengkalat, Gelam, Cemara and Gunung Pelawan units, it is known that workers have received PPE for free every year according to their respective types of work and if there is PPE damaged, it can be immediately reported to the direct supervisor for replacement. At the time of the audit, all workers were seen to have used PPE in accordance with existing standards and the level of risk, such as pesticide applicators using aprons, masks, face shields, gloves, boots, and others. In addition, the certification unit also has proof of the delivery of PPE to all workers every year and replacement of PPE that is damaged, for example:

- The company can show proof of handover of PPE for the Tengkalat Estate unit for harvester and loose fruit pickers. For example, handover of PPE for the May 2022 period for 64 workers in the rubber boot and gloves.
- The company can show proof of handover of PPE for the Tengkalat Mill unit for each station. For example, handover of PPE for the May 2022 period for 32 workers in the form of helmets, gloves, masks and ear plugs.

Regarding the follow-up of OFI at previous assessment, the company has provided PPE for the loose fruit picker. This is proven based on the results of field observations on harvesting and loose fruit work in Block H47 Div 3 Tengkalat Estate and Block G29 Div 1 Gelam Estate, it is known that workers have used PPE in accordance with the established HIRAC, such as AP boot and glove.

#### **Sanitation Facilities**

Based on the results of the field visit, it is known that the company already has sanitation facilities for workers with chemicals that can clean themselves as well as the equipment used and change clothes, which is also equipped with a storage area for controlling devices and PPE, this is in accordance with the results of interviews with 3 spray workers for example in Division 3 Block H51/52 Tengkalat Estate.

#### **6.7.4**

The company have Collective Labour Agreement that describe about workers have the right to receive medical care and be protected by the accident insurance. The management unit show proof of payment of Employment and Health Insurance (*BPJS Kesehatan dan Ketenagakerjaan*) for all workers. Payments are made every month by percentage according to the regulation. The last payment that has been paid by certification unit is on October 17, 2022 for “BPJS Ketenagakerjaan” period of September 2022 and on November 08, 2022 for “BPJS Kesehatan” period of November 2022. All proof of payment shown and payment details for the “BPJS Ketenagakerjaan and Kesehatan” program are in accordance with the current actual conditions / in accordance with the number of existing workers.

Based on the interview with representative of worker union, estate and mill workers, concluded that all employees were aware of the medical service procedures in the event of an accident or illness. All employees interviewed also claimed to have a health insurance (*BPJS Kesehatan*) card, if they went to a company clinic there was no fee at all. Based on the foregoing, it can be concluded that the company already has a list of employees participating in the Employment and Health Insurance (*BPJS Kesehatan dan Ketenagakerjaan*) program along with proof of monthly payments.

#### **6.7.5**

The company shows the FR and SR for the period January – December 2021, which are briefly explained as follows:

- Tengkalat POM → Lost Time Injury Frequency rate: 15 with number of lost time injuries are 6 cases.
- Tengkalat Estate → Lost Time Injury Frequency rate: 13 with number of lost time injuries are 14 cases.
- Gunung Pelawan Estate → Lost Time Injury Frequency rate: 9 with number of lost time injuries are 7 cases.
- Gelam Estate → Lost Time Injury Frequency rate: 2 with number of lost time injuries are 2 cases.
- Cemara Estate → Lost Time Injury Frequency rate: 4 with number of lost time injuries are 3 cases.

Based on verification document, the company can show proof of work accident claims to agencies related to the conditions of work accidents experienced by workers during 2021. Furthermore, it is known that the management unit carries out work accident investigations and makes claims to *BPJS Ketenagakerjaan* in accordance with established procedures, for example work accident claim for worker, initial HNS, dated August 5, 2021.

Status: Comply

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

#### **7.1**

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

##### **7.1.1**

The certification unit has an SOP for controlling weeds, pests and diseases with document number AGR-SOP07-01 which is valid starting March 3, 2020. Weed control is carried out biologically, manually and chemically. Pest and disease control is carried out in procedures, including leaf-eating beetles and grasshoppers, fruit borer caterpillars, termites, *Oryctes rhinoceros*, Rats, Pigs, Elephants, UPDKS, root rot and scion, shoot rot, and bunch rot.

The results of interviews with representatives of the certification unit showed that the pests in TGE and GPE were rats and termites.



Control of rats was carried out biologically (with owls) and chemically (with rodenticides if attack was > 5%). Meanwhile, termite control is carried out chemically using termiticides, with application every month if the attack is > 4 staples / Ha and application every 2 months if the attack is < 4 staples / Ha.

The company has shown records related to the recapitulation of the census of ganoderma, termites and rat. The records related to the results of the census include the following:

1. Census of termites conducted in Block E51 Division 1 Tengkalat Estate with an attack rate of 2.7% and still below the critical threshold.
2. Census of rat carried out in Block C50 Division 1 Tengkalat Estate with an attack rate of 4.6% and still below the critical threshold.
3. Census of ganoderma carried out in Block F52 Division 3 Tengkalat Estate with an attack rate of 4.7%.

Based on the results of the field visit, it was found that there were rat and termite attacks and ganoderma disease on the Tengkalat Estate but the attacks did not appear to be massive.

The company has tried to conduct biological control to suppress pest population diseases, such as planting and maintaining beneficial plants to suppress netter caterpillars, installing burn owl boxes and monitoring owls to suppress rat pest populations. In addition, the company has also utilized beneficial plants at PT Gunung Pelawan Lestari, among others: the company filled up *urnera subulata*, *cassia cobanensis*, and *antigonon leptopus*.

### 7.1.2

Results Based on document review and visits, it is known that the company uses species control agents including: *tyto alba*, *turnera subulata*, *cassia cobanensis*, and *antigonon leptopus* which species are not invasive according to the Minister of Environment and Forestry Regulation no. P.94/MENLHK/SEKJEN/KUM.1/12/2016.

### 7.1.3

Based on the results of interviews with management, it is known that there is no use of fire for pest control. Based on field observation at Tengkalat Estate, Gelam Estate, Gunung Pelawan Estate and Cemara Estate it was known that The company practices integrated pest management in handling pests and diseases, including the use of beneficial plants such as *turnera subulata*, *antigonon* and barn owl applications.

**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

The company has documented records of pesticide toxicity in the document of Monitoring Pesticide Use 2022. The document is recorded product name, active ingredients, LD50, percentage of active ingredients, total application and total active ingredients. This document is constantly recorded and updated by management officer each month.

The company has a policy to reduce the use of pesticides which is contained in the document "Sustainability Policy and Ethical Behavior". In the Occupational Safety and Health section it is explained that the Group intends to eliminate the use of pesticides that are categorized by the World Health Organization as class 1A or 1B, or those registered by the Stockholm or Rotterdam conventions and will not use paraquat. Based on document review and field observation, several IPM program with biological approach that has been implemented such as nettle eater caterpillar by planting beneficial plant such as *Turnera subulata* and *Antigonon leptopus*. Moreover, the company has also conducted early detection routinely listed in the monthly report of early warning system.

The company can show records of pesticide use in 2021 – 2022 for all Estate units, for example the use of pesticides in TGE units as follows:

Active Ingredient	Semester 1 – 2021		Semester 2 – 2021		Semester 1 – 2022		Semester 2 – 2022	
	Quantity (L)	Area	Quantity (L)	Area	Quantity (L)	Area	Quantity (L)	Area
<i>Glyphosate isopropyl ammonium</i>	1,385.25	2,202.16	883.50	1,315.97	1,076.25	2,202.16	669.00	1,315.97
<i>Metsulfuron methyl</i>	325.00	2,202.16	212.18	1,315.97	258.05	2,202.16	168.95	1,315.97



<i>Fipronil</i>	74.40	2,202.16	23.60	1,315.97	31.60	2,202.16	4.20	1,315.97
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Furthermore, based on record of pesticide use, the use of the active ingredient *Glyphosate isopropyl ammonium* (target: narrow leaf weed) was recorded at 0.187 L/Ha, *Metsulfuron methyl* (target: broadleaf weeds and woody saplings) at 0.128 L/Ha and *Fipronil* (target: termite) at 0.003 L/Ha.

Based on the explanation above, it is concluded that there is a reduction in the use of pesticides, especially for weed control. The increase in the use of rodenticides is due to the high rate of rat attack according to the results of the census.

#### 7.2.4

There is no prophylactic way of using pesticides carried out by the company. The company controls using pesticides if the pest attack census shows results above the threshold. Whereas for weed control If the conditions of the circle and harvest pathway are still quite standard, weed control will be postponed. Based on observations of spraying activities, the application method is not a preventive application but is more selective for locations that have weeds.

#### 7.2.5

Based on the results of the study of data on pesticide use for all units of the Estate, it is known that there is no use of pesticides that are included in the World Health Organization (WHO) Class 1A or 1B list or included in the Stockholm or Rotterdam Conventions, as well as paraquat.

#### 7.2.6

The company also provided information materials of periodic training on pesticide handling that was held on March 31, 2022 in Tengkalat Estate and was attended by 24 people.

The pesticide applicator also using personal protective equipment in accordance with specified hazard identification and material safety data sheet such as respirator mask, gloves, safety shoes, apron and goggles. In addition, employees are also informed about the steps of secure work in each roll call in the morning before work. Meanwhile, the spraying workers interviewed also claimed that after spraying they will be washing up and drying up the PPE and spraying tools (sprayer tank, jerry, etc), and taking shower/changing clothes in special place near pesticide store of the division office. Therefore, based on field observation to mixing area in Tengkalat Estate, that known there are storage for keeping all PPE's and spraying tools after use.

#### 7.2.7

Based on the results of field visits at the chemical storage warehouse, it is known that the storage area has been equipped with adequate lighting, ventilation, OHS hazard symbols as well as emergency response facilities and infrastructure. In addition, no expired pesticides were found. Therefore, it is known that the storage of all pesticides is in accordance with recognized best practices, which refers to PP. 74 of 2001 concerning Management of Hazardous and Toxic Materials.

#### 7.2.8

The company can show the identification document of waste resulting from operational activities contained in the document GPL/SOP/K3-11 revision 01, effective April 27, 2015. The SOP describes the pesticide storage mechanism that is carried out according to the recommendations provided in the MSDS, placement of materials chemicals that have dissimilar characteristics must be separated according to MSDS recommendations, preparation and release of chemicals is carried out first in first out, chemical containers must have labels, chemicals are only issued on request approved by the authorities and record storage and release well-documented agrochemicals (including pesticides). The company has also conducted socialization to employees regarding the prohibition on the use of hazardous waste packaging including used pesticide packaging on February 14-17, 2022.

Based on field observations in agrochemical warehouses and hazardous waste storage areas at Cemara estate, Gunung Pelawan Estate and Gelam Estate, it is known that pesticide storage areas are well managed, oil traps are available, adequate air ducts and are isolated. Used pesticide packages classified as Hazardous Waste were also found stored in a well-monitored Hazardous Waste storage warehouse which was then transported to licensed collectors such as, the last transported on 15 October 2022 from Gelam Estate is 0.2276 ton with manifest number KLHK-1669148160.

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

#### 7.2.9

Based on a review of documents and interviews with surrounding village and workers sighted that the company did not perform the application of pesticides from the air.

#### 7.2.10

The last medical examination carried out for pesticide and chemical handlers was carried out on August 1, 2022 for 103 workers related to chemicals in PT Gunung Pelawan Lestari. All workers spray has examined health through inspection types of *cholinesterase* to ascertain the condition of workers in good health/normal. The results of interviews with pesticide operators in Spray Circle & Path, Division 3 Block H51/52 Tengkalat Estate that all pesticide operators have been checked health periodically and workers have known the results of the examination. From the results of the examination, all workers fit to work.

#### 7.2.11

During the audit, the pesticide application conducted at estate area to control weeds in the circle and path. Based on field observation and interview with pesticides applicator known that there was no worker age under 18 years old that worked in chemical activity. The pregnant and breastfeeding women prohibited to work in chemical. The monitoring conducted through monthly pregnancy test. If founded expectant mother, she will be transferred to light non chemical activity.

Status: Comply

### 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 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 incinerator, 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.

#### 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.

#### Domestic waste

Domestic waste generated from housing and offices will be disposed of in Landfills.

#### Hazardous and Toxic waste

The company has a SOP for the management of hazardous and toxic waste with document number GPL/SOP/K3-11 revision 01, effective April 27, 2015 which describes procedures for managing hazardous and toxic waste. The hazardous and toxic materials referred to include: waste from the use of chemicals and toxic, used light bulbs, waste from the use of oil, waste from using batteries, waste from using used filters, cloth rags, waste from chemical packaging, and all chemicals contained in plantation and factory activities.

The company has shown proof of delivery to licensed carriers and collectors, namely PT Valten Cahaya Anugrah with transportation using vehicle No. BN 8024 QU dated October 15, 2022, hazardous and toxic waste materials have been the last delivered from the following units:

- Used tonner as much as 0.0206 ton with Manifest KLHK-1669147917.
- Used rag as much as 0.1387 ton with Manifest KLHK-1669148007.
- Used lamp as much as 0.0129 ton with Manifest KLHK-1669148051.
- Used lubricant as much as 0.71 ton with Manifest KLHK-1669148123.
- Used battery as much as 0.14 ton with Manifest KLHK-1669148158.
- Used hazardous container as much as 0.2276 ton with Manifest KLHK-1669148160.
- Medical waste as much as 0.0055 ton with Manifest KLHK-1628684563.

The company also has a document checklist of areas that produce hazardous waste, such as spills from diesel tanks, monitoring is carried out every month in the diesel tank area, based on the results of document verification from January to October 2022 in the refueling areas in Tengkalat estate, Gunung Pelawan estate and Cemara estate, there is a fuel spill hazardous waste. Base on interviews with PIC at each refueling station, officers understand the actions in case of an emergency and the type of hazardous waste generated from the station.

The results of field visits to hazardous waste storage warehouses at Tengkalat POM and Tengkalat estate, Gunung Pelawan estate and Cemara estate, also show that the company has carried out hazardous waste management quite well. All obligations listed in the waste storage permit have been fulfilled, such as the availability of fire extinguishers, showers, eyewash, coordinates, alarms, first aid kits, oil traps and appropriate labeling. In addition to good lighting and air ventilation, the company also has drainage channels on the outside of the warehouse to anticipate pollution to the surrounding environment. The results of interviews with warehouse managers also show that managers fully understand the SOP for hazardous waste management and mitigation actions in the event of potential pollution. Regarding the follow-up of OFI at previous assessment, based on the results of field observations in the warehouse area of each Estate, it is known that there is no potential for fuel to spill directly the ground during refueling. The waste management from potential fuel spills by constructing bund walls and providing spill kits.

### 7.3.2

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

- Empty fruit bunch is applied to estate plantation area to substitute chemical fertilizer. Based on field visit EFB application is well managed.
- Shell and fiber are reused for engine fuel of boiler. It reduces the carbon emission from the combustion of fossil fuel.
- POME use for fertilizer, based on field visit the condition of flatbed has been maintenance well and no environmental pollution potential.
- The managing for clinical waste, the company also has cooperation with licensed parties such as PT Valten Cahaya Anugrah.

Based on the results of interviews with representatives of workers and managers, information was obtained that they understood the waste management plan in each work area.

The company has a document IK-35/GPL/2016 regarding Washing of chemical packaging issued on September 27, 2016, the work instruction explains that before being stored in the fertilizer sack warehouse, it must first be washed 3 times.

Based on the results of field visits and interviews at the Cemara estate and Pelawan estate fertilizer sack warehouses (Benak area) it was found that there were a number of used fertilizer sacks that had not been washed, according to an explanation from the head of the warehouse this was due to time constraints for fertilizer sack washing officers which were usually carried out by the foreman. Companies are encouraged to ensure the implementation of waste management of used fertilizer sacks as described in the company's work instructions. **OFI**

### 7.3.3

The company does not carry out open burning for solid waste disposal generated of the mill. Base on field observation known solid waste such as EFB, and hazardous waste no burned. For shell and fiber burned in a closed place used as boiler fuel.

Based on the results of field visits to employee housing and warehouse areas, both plantations and factories, it was found that there

were no burning or open burning for waste destruction. Each housing has provided a trash can for domestic waste such as organic and inorganic. Hazardous and toxic waste will be collected in a temporary storage area for Hazardous and Toxic Waste.

Regarding the follow-up of OFI at previous assessment, Based on interviews with company representatives, it is known that the company has a policy of prohibiting burning in the company's area. The company has also socialized this policy to contractors on 11 October 2022. Based on the results of interviews with contractor representatives, information was obtained that local contractors had understood prohibiting burning in the company's area. Based on the results of field visits during the audit activities it was concluded that there was no evidence that there was open burning of waste included for by contractor operation.

<b>Status: Comply</b>
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#### 7.4

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

##### 7.4.1

Evans Group Indonesia has a Fertilization SOP with document number AGR-SOP09-01 dated March 03, 2020. This SOP explains that fertilization recommendations are determined with considerations including nutrient status in leaves, soil ability to provide nutrients, plant conditions, and climate.

The company shown the program and the realization of fertilization application for period January until December 2022 which refers to the recommendation for fertilization in 2022. The recommendation for fertilization is based on the results of the leaf analysis and soil analysis from the previous year. Therefore, based on document review and interview with the staff, the realization of fertilization in PT GPL is in accordance to the program. Fertilization programs in semester I 2022 are 100% applied based on fertilizer recommendations. The auditor conducted an interview with the fertilizer workers at Tengkalat, Gelam and Gunung Pelawan Estate is known fertilization is done manually by workers. Workers can also explain the fertilization procedure well, which is in accordance with the dosage determined based on the recommendations.

##### 7.4.2

To find out the soil fertility, the company conducting of soil and leaf analysis periodically, for example for Tengkalat Estate:

- **Soil Analysis Activities** - Laboratory analysis about the condition and soil nutrient content in the soil samples to determine the fertilizer recommendation in maintaining and improving the balance of nutrients in the soil. Parameters measured among others: Texture, acidity (pH), content of C-org, N-total, P, Ca, Mg, K, Na, Fe, Cu, Zn, Al and H. The last soil sample analysis was carried out by Department of Soil Science's Laboratory, Bogor Agricultural University on 13 April 2020 with total sample is 92 units.
- **Leaf Analysis Activities** - The results of leaf analysis annually published the recommendations of fertilizer dosage to produce the optimal palm fruit. The principle of fertilization is the provision of treatment on the soil to produce the nutrients required by the palm oil with optimum results. Indicator Major elements namely N, P, K, Ca and Mg and Indicator Minor elements namely B, Cu and Zn. Foliar Analysis was carried out by Research and Development Centre PT Nusa Pusaka Kencana Analytical & QC Laboratory on June 17, 2021 with total sample is 92 units.
- **Visual Analysis Activities** - Visual observations performed every year at the time of leaf analysis activities. Visual observation is a consideration in determining the fertilizer recommendations, deficiency of nutrients and analyse the potential of disease which is likely to become endemic of a particular disease.

The result of soil and leaf analysis published recommendations for fertilizer doses to produce optimal production of palm fruit. Principles of fertilization are giving treatment on the ground to produce the nutrients required by palm and generating optimal results.

##### 7.4.3

Companies can show records of the use of organic materials as a nutrient recycling strategy. For example in Tengkalat Estate, the application of compost for the period of January-September 2022 is 10,441.10 tons and pome is 193,454.71 m<sup>3</sup>. Overall, the company has made efforts to maintain and improve soil fertility. Until Re-Certification Assessment, the company has not carried out replanting activities, so there was no use of the palm residue after replanting.

##### 7.4.4

The company has recorded inorganic fertilization and organic fertilizing well during 2022 and recorded it in the fertilization month report. For example in Tengkalat Estate, The MOP used in semester 1 by the company is 507.65 tons and urea used is 281.05 tons. Overall, the company has made efforts to maintain and improve soil fertility. Visually, there are no symptoms of nutritional deficiencies in the blocks that have been visited.

<b>Status: Comply</b>
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## 7.5

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

#### 7.5.1; 7.5.2: 7.5.3

Land suitability maps for oil palm cultivation are included in the semi-detailed 2009 soil survey report conducted by PT Earth Line. Maps are available at a scale of 1: 80,000 for soil and slope types. PT GPL is located in Bangka Regency at an altitude of 0-50 meters above sea level. The terrain of the estate is generally flat to undulating (97.48%), rolling to hilly (2.47%) and steep (0.05%).

The soil are dominantly mineral material as result of the from mainly depending on the degree of illuviation and eluviation process (Spodosol, Entisol, Ultisols and Inceptisol). Sandy soil is a type of soil which have sandy in all layers and found in lowland along coastlbe which influences by marine and beaches. It has more than 90% resistant minerals and relatively low water-holding capacity, very low nutrient and low mineral capacity. Some places founded hardpan area on depth of 50-60 cm. These condition become limiting factor or unsuitable for plant growing.

Peat soil are found in the lowland (depression) of the eastern part of estates with a depth of 1-1.5 m with an area of 398.45 ha; 1.5-2.0 m covering 224.18 ha; 2.0-3.0 m covers an area of 148.24 ha.

Based on document verification sighted that the oldest oil palm planted year is year of 2006. Therefore interview result sighted that the replanting activity will be conducted on 2031. Based on field observation at Tengkalat Estate, Gelam Estate, Gunung Pelawan Estate and Cemara Estate it was known that there is no planting on steep terrain during period 2006 to 2017, as well as interview with stakeholders sighted that there are no new development during period of 2006 to 2017.

<b>Status: Comply</b>
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## 7.6

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

#### 7.6.1; 7.6.2

Land suitability maps for oil palm cultivation are included in the semi-detailed 2009 soil survey report conducted by PT Earth Line. Maps are available at a scale of 1: 80,000 for soil and slope types. PT GPL is located in Bangka Regency at an altitude of 0-50 meters above sea level. The terrain of the estate is generally flat to undulating (97.48%), rolling to hilly (2.47%) and steep (0.05%).

The soil are dominantly mineral material as result of the from mainly depending on the degree of illuviation and eluviation process (Spodosol, Entisol, Ultisols and Inceptisol). Sandy soil is a type of soil which have sandy in all layers and found in lowland along coastlbe which influences by marine and beaches. It has more than 90% resistant minerals and relatively low water-holding capacity, very low nutrient and low mineral capacity. Some places founded hardpan area on depth of 50-60 cm, especially KKPA Tengkalat Area. These condition become limiting factor or unsuitable for plant growing. The efforts made by unit management in managing marginal land in this area include the use of empty bunch to increase water retention.

Peat soil are found in the lowland (depression) of the eastern part of estates with a depth of 1-1.5 m with an area of 398.45 ha; 1.5-2.0 m covering 224.18 ha; 2.0-3.0 m covers an area of 148.24 ha.

#### 7.6.3

The soil type maps and topographic maps containing information on soil classification, texture, drainage, limiting factors and suitability information for the development of oil palm plantations have helped companies to manage blocks, roads, drainage, bridges, etc. The Unit of Certification also has a Road Maintenance Program that is equipped with adequate infrastructure and facilities to carry out the work. According to the results of the field visit, roads are in good condition and harvested FFB is transported smoothly to Mill.



Moreover, based on interview with unit management's representative, it was known that the company considers soil survey report in the technical implementation of oil palm planting from 2010 to 2017.

**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**  
Land suitability maps for oil palm cultivation are included in the semi-detailed 2009 soil survey report conducted by PT Earth Line. Maps are available at a scale of 1: 80,000 for soil and slope types. Both maps inform that there is peat soil with a depth of 1-1.5 m with an area of 398.45 ha; 1.5-2.0 m covering 224.18 ha; 2.0-3.0 m covers an area of 148.24 ha.

Based on the results of interviews and a review of the area statement documents, it is known that the company did not carry out new plantings on peatlands after November 15, 2018.

**7.7.2**  
The company has carried out an inventory of peat according to the RSPO peat inventory template and reports have been sent to the RSPO secretariat as evidenced by an updated email sent by Arvind Devadasan to ghg@rspo.org on January 27, 2021.

**7.7.3; 7.7.4**  
The company has monitored the level of peat subsidence. In addition, the company has installed 3 subsidence pole units, 21 piezometers and 2 stop bund units in Tengkalat Estate. Monitoring of peat surface subsidence (subsidence) is carried out once a year in December.

The company shows subsidies and water level monitoring documents in Tengkalat Estate. Examples of monitoring land subsidence are as follows:

1. Monitoring was carried out at the pole subsidence No.1 Block E47 in December 21, 2021 it was discovered that there was an average land subsidence of 1 cm.
2. Monitoring was carried out at the pole subsidence No.2 Block E49 in December 21, 2021 known that there was an average land subsidence of 1 cm.
3. Monitoring was carried out at the pole subsidence No.3 Block E52 in December 21, 2021 known that there was an average land subsidence of 1 cm.

Based on the explanation above, it is known that the rate of reduction in subsidence is still in accordance with applicable regulations.

Peatland subsidies have been attempted to be minimized by regulating water levels with regular monitoring using a piezometer and making dams with stop bund as a barrier and waster of water (with overflow).

The company shows monitoring groundwater level measurements in October 2022 at Tengkalat Estate including the following:

Monitoring dated (October 2022)	Tengkalat Estate (cm)					
	PZ1	PZ10	PZ14	PZ18	PZ28	PZ30
Week-1	33	30	31	30	36	38
Week-2	30	30	31	29	32	30
Week-3	30	30	29	29	32	28
Week-4	28	30	29	29	28	28

**7.7.5**  
The representative of the certification unit explained that based on the area statement document, the age of the oldest oil palm at the time of recertification was still 15 years (2006 planting year) so there is no replanting plan.

**7.7.6**  
Estate management has adopting peat management in accordance with applicable regulation in Indonesia, such as conducting field



drainage system, as well as monitoring on water level, water table and subsidence rates, as explained in Indicator 7.7.3 and 7.7.4. In line with this, based on the results of field observations in Block E54 Tengkalat Estate it is known that the decrease in the subsidence rate is 1cm with a water level that is maintained at 30cm.

#### 7.7.7

There is no new land clearing on peat areas in PT Gunung Pelawan Lestari areas.

**Status: Comply**

### 7.8

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

##### 7.8.1

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

- Inventory of location and area and mapped according to the determination of the size of the river border
- Marking of river border areas by putting red paint marks on oil palm trunks which are the boundaries of oil palm plantations that are not allowed to do plantation activities.
- Planting Vertiver grass, and legumes (controlled) and inserting intercrops on riverbanks whose vegetation has been converted to oil palm plantations.
- Do not apply chemicals in river border areas.
- Not disposing of liquid waste into the river but reusing it to plantation land. Before being used, the liquid waste must be managed at the WWTP so that the quality meets the standards set by the government.
- Utilizing water for factory processing in accordance with the standards set by the company.
- Conduct testing of river water quality and monitoring wells.

In addition, the company has a riparian management plan that is included in the HCV management plan, including:

- Socialization of HCV and the environment to the community
- Greening.
- HCV (riparian) patrols
- Maintenance of HCV sign boards

The surface water quality monitoring program has been listed in PT Gunung Pelawan Lestari's RKL-RPL document. The results of tests conducted by the PT Itec Solution Indonesia Laboratory on March 24, 2022 on location upstream Tengkalat river block H48, Central Tengkalat river block E46 and downstream Tengkalat river block C45. From the results of the tests that have been carried out, it is known that the test results are in accordance with the provisions of the legislation (Regulation of the Minister of Environment No. 22 of 2021 attachment VI).

The company has been monitoring of ground water quality on 3 monitoring well sample point and 1 resident well date 24 March 2022 has been carried out by management with results still in accordance with applicable regulations (Permenkes No.32 year 2017), in addition to ensuring the absence of pollution and avoiding the occurrence of pollution.

##### 7.8.2

The wet flow found in the company area is in the form of a river. The company can show a map of rivers, water bodies and wet areas listed on the map of high conservation value areas, with a scale of 1:100,000. as for the rivers that flow in the company's area are the tengkalat river and the air duku river.

Based on the results of a field visit to the F38 Gelam Estate riparian and the water flow from the Damar hill block J13 there are indications of traces of the application of chemical pesticides and fertilizers in the water stream, this has become a non-compliance number 2022.01 with major category on indicator 7.12.4.

##### 7.8.3

The company has carried out periodic monitoring of the quality of mill effluent in accordance with applicable regulations. The results of testing the quality of wastewater for the period Januari 2021 – September 2022 where the pH and BOD parameters were still below

the quality standard (KepmenLH No 29-year 2003).

The company already has a permit to utilize POME to the ground for application to soil in accordance with the Decree of the Head of DINPMP2KUKM Bangka Regency number 188.4/01/IPAL/DINPMP2KUKM/IV/2019 on April 1, 2019 with a validity period of 5 years.

#### 7.8.4

The company recorded its actual water use. The average water use per tons FFB for a period of October 2021 – September 2022 is 1.10 m<sup>3</sup>/ton FFB, while the budget for water consumption for the period 2022 is 1.20 m<sup>3</sup>/ton FFB.

The water use permit is determined based on the Decree of the Minister of Public Works and Public Housing number 122/KPTS/M/2018 dated 15 February 2018 which is valid for 5 years from the date of stipulation.

In addition, the company can also show proof of payment of the surface water levy to the Regional Finance Agency for the period January until September 2022. Based on the verification results, it is known that the payment of the water levy is in accordance with the surface water bill from the Regional Finance Agency of the Kepulauan Bangka Belitung Province.

**Status: Comply**

#### 7.9

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

##### 7.9.1

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

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

The company already maximizing the use of renewable energy (fiber & shell) as boiler fuel. For example, use of shells and fiber period January to December 2021 Tengkalat POM has produces 1,163,864 kWh of electricity from turbine. Renewable energy use per ton of palm product in the mill is 14.60 kwh / ton CPO. Result Direct fossil fuel used is 0.12 kWh/ ton CPO. The efficiency decreased from previous calculated because FFB process increased on January to December 2021.

**Status: Comply**

#### 7.10

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

##### 7.10.1

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

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

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

Based on document review for examples: pesticides usages monitoring, diesel fuel monitoring, HCV identification and etc found that accurate data has been put into the RSPO palm GHG Calculator. Summary of net GHG emissions from PalmGHG calculator of the

audit report which calculation option is applied "Apply full Version".

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

Emissions per product	tCO <sub>2</sub> e/tProduct
CPO	1.82
PK	1.82

Production	t/yr
FFB processed	311,333.12
CPO produced	74194.12
PK produced	17802.65

Extraction	%
OER	23.83
KER	5.72

Land use	Ha
Planted area on mineral	9252.93
Planted on peat	779.62
Total area planted	10032.55
Conservation Area (Forested)	454.69
Conservation Area (Non-Forested)	0
FFB Production per hectare	31.03

#### Summary of field emission and Sinks

Description	Own crop		Group		3rd	Total
Emissions Sources	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB	tCO <sub>2</sub> e	
Land conversion	71505.47	0.31	0	0	0	71505.47
CO <sub>2</sub> emissions from fertilizer	8811.93	0.04	0	0	0	8811.93
NO <sub>2</sub> emissions from peat	5835.97	0.03	0	0	0	5835.97
NO <sub>2</sub> from Fertilizer	7199.91	0.03	0	0	0	7199.91
Fuel consumption	1112.04	0.03	0	0	0	1112.04
Peat oxidation	42566.71	0.18	0	0	0	42566.71
Sinks						
Crop sequestration	-93922.08	-0.40	0	0	0	-93922.08
Sequestration in	-4169.51	-0.20	0	0	0	-4169.51
Conservation area						
<b>Total</b>	<b>38940.45</b>	<b>0.17</b>	<b>0</b>	<b>0</b>	<b>132875.20</b>	<b>171815.64</b>

#### Summary Oil Mill Emissions and Credits

Remarks	tCO <sub>2</sub> e	tCO <sub>2</sub> e/t FFB
Emissions sources		
POME	4565.39	0.01
Fuel consumption	342.95	0
Grid electricity	0	0
Credits		
Export of grid electricity	-9083.41	-0.03
Sales of PKS	0	0

Sales of EFB	0	0
Total	-4175.07	-0.01

**Palm Oil Mill Effluent (POME) Treatment**

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

**POME Divert to Anaerobic Digestion**

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

**7.10.2**

Based on planting year data, there is no new planting activities above 15 November 2018.

**7.10.3**

For existing operation, the company has identified pollutions and emissions sources of Tengkalat POM for period 2022, such as CO<sub>2</sub> (boiler, generator, transportation), CH<sub>4</sub> (POME), hazardous waste (WTP, chemical storage), noise (machinery). The sources of pollution and emissions for estate are listed on the identification documents and management plans for pollution sources for the period 2022, such as: emissions (CO<sub>2</sub>, CO), noise, chemical waste, organic and inorganic waste and infectious waste. Plans to reduce or minimize has been implemented and monitored as explained on RKL-RPL semester 1-year 2022.

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

**Status: Comply**

**7.11**

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

**7.11.1; 7.11.2**

The company has a standard operating procedure (SOP) for land clearing including land management, which among others is stated in the SOP for Land Clearing, document number GPL/SOP/AGRO-02, Revision 00, effective date August 7, 2012. This procedure explains that the land clearing system: without burning (zero burning), land clearing by slashing, leaving the rest in a certain path (stacking) until it rots in place and using heavy equipment to do mechanical mulch.

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

- Monitor fire facilities and infrastructure owned every month. For example, for the period of semester 1 of 2022 it is known that there are no fire case in the company's work area
- Have a map of fire-prone areas with a scale of 1: 80,000. From the map, it is known that there are 9 fire-prone areas.
- Has an emergency response team structure that has been trained to deal with fires
- Conduct training simulations on a regular basis
- Monitoring and control of land fires for the first semester of 2022 was submitted to the Agriculture Office of Bangka Regency and Bangka Province on August 5, 2022

The company can show a list of emergency response preparedness equipment along with a recording of its condition monitoring which is carried out every month, as for the list of emergency preparedness equipment owned by the company as of October 2022

- Water tank
- Water pump
- Hose
- Nozzle
- Light fire extinguisher

- Hydrants
- Portable pump
- First Aid
- etc

The results of an interview with the Agriculture Agency of Bangka Regency, it is stated that the facilities and infrastructure owned by the company are quite adequate. In addition, there is no history of fires or the appearance of hotspots in the company area within the last 2 years.

### 7.11.3

The company can show recordings of periodic training, for example the Minutes of Socialization Emergency Response Simulations which were carried out on December 29, 2021, which involved local stakeholders such as Mapur village, Silip Village etc..

Based on the results of field observations in the operational activities, it shows that there is no operational activities that use fire. Based on interviews with management and external stakeholder, it was stated that all land clearing activities were mechanical. Based on an interview with relevant agencies, it was also stated that the company has shown a commitment not to burn for land clearing through fire simulation activities involving various stakeholders.

**Status: Comply**

### 7.12

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

#### 7.12.1; 7.12.8

Until recertification audit was carried out, there was no new land development carried out by the company. Land preparation for PT. GPL started 2005, where year of planting are 2006 – 2017. PT. GPL has conducted New Planting Procedure (NPP) on 13-17 December 2013 and has been submitted to the RSPO website on 3 January 2014. There are no comments from stakeholders for its NPP notification.

Disclosure of Liability for MP Evans Group PLC (and its subsidiaries) has been submitted to the RSPO on 23 July 2014 and RSPO stated **have no non-compliant land clearance**. All subsidiaries of MP Evans Group PLC are:

1. PT Pangkatan Indonesia (North Sumatera)
2. PT Bilah Plantindo (North Sumatera)
3. PT Sembada Sennah Maju (North Sumatera)
4. PT Simpang Kiri Plantation Indonesia (Aceh)
5. **PT Gunung Pelawan Lestari (Bangka)**
6. PT Prima Mitrajaya Mandiri (East Kalimantan)
7. PT Teguh Jayaprima Abadi (East Kalimantan)
8. PT Evans Lestari (South Sumatera)

According to these, MP Evans Group PLC and its subsidiaries does not necessary to made Land Use Change Analysis.

The unit is not applied RACP since the land clearing was done after the study of environmental (biodiversity value) and social impact assessment of palm oil development in May 2005 by Environmental Management & Monitoring Pty Ltd.

#### 7.12.2

The company has re-identified HCV which was carried out in May 2013 by Aksenta with the team leader having an RSPO Approved HCV Assessor. Field data collection was carried out on 14-22 January 2013. The scope of the HCV identification study carried out in accordance with the location permit was 13,565 Ha. The identified HCV area is 454.69 Ha with HCV elements identified as HCV 1.2; HCV 1.3; HCV 1.4; HCV 3; HCV 4.1, HCV 4.2. and HCV 6. Based on the document review, it is known that the company did not develop new land after November 2018 so that the HCV identification document held is still valid. The types of flora and fauna identified are as follows:

Vegetation identified: *Pelawan (Tristaniopsis wightiana)*, *Gelam (Melaleuca cajuputi)*, *Simpur (Dilenia sp.)*.

Fauna (wildlife) identified: *Tarsius (Tarsius bancanus)*, *Trenggiling (Manis javanica)*, *Kubung (Cynocephalus variegatus)*, *Kukang (Nycticebus coucang)*, *Lutung (Trachypithecus cristatus)*, *Monyet ekor panjang (Macaca fascicularis)*, *Beruk (Macaca nemestrina)*, *Tupai (Callosciurus prevosti)*, *Jelarang (Ratufa affinis)*, *Berang-berang (Lutra sumatrana)*, *Tengalung (Vivera tangalunga)*, *Musang luwak (Paradoxurus hermaphrodites)*, *Kucing hutan (Prionailurus bengalensis)*, *Babi hutan (Sus scrofa)*, *Kancil (Tragulus kanchil)*, *Napu (Tragulus napu)*, *Kijang (Muntiacus muntjak)*, dan *Rusa sambar (Cervus unicolor)*, *Puyuh sengayan (Rollulus rouloul)*, *Walik jambu (Ptilinopus jambu)*, *Sempur-hujan darat (Eurylaimus ochromalus)*, *Planduk merah (Trichastoma bicolor)*, *Ciungair pongpong (Macronous ptilosus)*, *Kepudang hutan (Oriolus xanthonotus)*, *Labi-labi (Amyda cartilaginea)*, *kura-kura (Coura amboinensis)*, *Biawak (Varanus salvator)*, *Ular sawah (Python reticulatus)*.

### 7.12.3

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

### 7.12.4

The company already has an HCV management plan that is listed in the Management and Monitoring Plan of HCV for the period 2021 – 2023. The management plan was prepared based on the results of a management plan review for the previous period which was carried out in a participatory manner involving the surrounding community and employees and reported to BKSDA Bangka. The HCV management and monitoring plan includes:

- Installation of HCV signboards
- Create a flow chart of the mechanism of protected animals
- Mapping transects plots/lines
- Socialization of HCV and the environment to the community (external)
- Greening
- Animal mitigation training
- HCV Patrol
- Mitigation of animal conflicts
- Vegetation analysis

Companies can show records of HCV management carried out in the period year 2022, for example:

- Socialization of HCV and the environment to the community.
- Training on animal inventory and monitoring conducted in 22 August 2022 for staff and employees.
- Reforestation of conservation areas in and 19 July 2022 in Block F33 Gelam estate, Block N23 Cemara Estate, and Block H28 Cemara Estate.
- HCV sign board maintenance carried out on January until July 2022.
- Animal conflict mitigation training on 12 December 2020 and 11 April 2021 for all staff and employees.
- Animal monitoring was carried out on January until September 2022 on all estate. The results of animal monitoring revealed that there are protected animals in accordance with LHK Ministerial Regulation NO 106 of 2018, namely the Punai Bird (Treron Sp). As for other types of animals found, such as Water monitor lizards, long-tailed monkeys, finches, leaf birds, green snakes, squirrels, etc.
- Identification of threats and sources of threats to the presence of HCVs carried out in January until September 2022. From the results of the report during the activities, there were no threats such as hunting, illegal logging, animal traps and forest fires in the HCV area.

Regarding the HCV area management and protection plan, it is contained in several documents, namely:

- PT GPL 2022 HCV review document explains the HCV management plan by installing HCV signboards such as prohibiting activities that endanger the area by hunting, burning, cutting trees and using chemicals, especially in riparian areas.
- SOP document for riparian buffer management which explains:
  - Small river < 10 meters HCV area 50 meters to the left and right of the river.
  - Small river > 10 meters HCV area 100 meters to the left and right of the river.
  - Point 3.3.4 for oil palm trees is marked with an X, no need for fertilization and chemical treatment, wood shoots and shrubs



are allowed to grow naturally.

- The company shows PT GPL 2021-2023 HCV management and monitoring documents which explain that HCV patrols are carried out every month and maintenance of conservation attributes is carried out twice a year.

As the implementation of these procedures during the audit process, evidence of the implementation of the plan can be shown, including:

- PT GPL's 2022 HCV review document describes the program for riparian management, maintenance of HCV boundary signs and HCV signs to be carried out every 6 months, the latest realization on April 22, 2022.
- HCV patrols for the period July – June 2022 explained that maintenance of the conservation area boundary markers had been carried out in the river riparian area in a maintained condition.

However, based on the results of field visits in the riparian conservation area, information was obtained that:

- In the Bukit Damar HCV area block J13 there is a river that flows throughout the year (result of the interview), there is no boundary for the conservation area on the riparian, open fertilization activities with the MOP type were also found in that area. Based on the verification results of the 2013 HCV assessment documents, it was explained that the HCV area of Damar block J13 is a water response area that has an important hydrological system function that needs to be maintained.
- There is a boundary for the conservation area in the F38 Gelam Estate block of the river, in that area pesticide spraying was also found in the riparian area, this was also confirmed from the results of verification of the work form document for the foreman of the pesticide application which also explained that an application had been made pesticides (spraying circle path) in block F38 on 28 September 2022.

The company has not been able to show evidence of the implementation of the water resources HCV management plan in accordance with the HCV Management plan and SOP they have. **This indicator become non conformity number 2022.01 with major category.**

#### 7.12.5

Based on a review of the documents in the January 2013 identification report, field observations and the results of consultations with relevant agencies and interviews with local communities, it is known that there is no community arable land that is used as a conservation area so there is no need for an agreement that has been negotiated to protect the HCV area and rights local community.

#### 7.12.6

The prohibition of harming, capturing or killing RTE species is described in the SOP for HCV management and monitoring (No. GPL/SOP/Umum-07, Revision 01, April 1, 2017). If a worker is found to have hurt, arrested, or killed, the company will issue a warning and/or a warning letter. To date, there have been no incidents of capture of RTE species.

In an effort to provide education to Workers and the Community regarding Animals and Plants as well as HCV areas, the Company conducts direct and indirect socialization through signboards on protected animal and plant species and prohibitions on hunting and catching animals in the company area. For example, the following is a recording of the socialization carried out by the company:

##### Employee

- Minutes of HCV socialization including the presence of flora and fauna to 64 employees of Cemara Estate on 18 July 2022.
- Minutes of HCV socialization including the presence of flora and fauna to 67 Gelam Estate employees on 20 July 2022.
- Minutes of HCV socialization including the presence of flora and fauna to 52 employees of Gunung Pelawan Estate on September 19, 2022.
- Minutes of HCV socialization including the presence of flora and fauna to 77 Tengkalat Estate employees on 26 September 2022.

##### Community

- Minutes of socialization of ISPO/RSPO, Environment, HCV, and company policies to 50 people of Gunung Muda Village on 22 August 2022. (Cemara Estate).
- Minutes of socialization of ISPO/RSPO, Environment, HCV, and company policies to 36 Silip Village communities on 24 August 2022. (Gelam Estate)
- Minutes of socialization of ISPO/RSPO, Environment, HCV, and company policies to 21 Gunung Pelawan Village communities on 29 August 2022. (Gunung Pelawan Estate)
- Minutes of socialization of ISPO/RSPO, Environment, HCV, and company policies to 26 villagers of Mapur Village on 30 August

2022. (Tengkalat Estate).

Based on interviews with harvesting and fertilizer workers at the Tengkalat estate, Gunung Pelawan estate, Gelam estate and Cemara estates, it is known that the workers understand the presence of HCV areas in the company area and understand that the company protects the HCV area and also protects the flora and fauna found in the company area.

#### 7.12.7

The company has monitored the status of HCV including RTE species found in the company's area. The monitoring results will be evaluated and become input for the next year's HCV management plan. The company can show the HCV management plan review and evaluation document. The results of the review, for example, are as follows:

- The management action plan made in the HCV management plan has been implemented in its entirety
- The most commonly found animals are the prawns, the whistle-blowers, the croaks, and the perennials
- The protected animal recorded in the mitigation book contained in the company's area is the king prawn (*Halvion sinymensis*).
- There is no conflict between animals and humans in the company area.
- There is no application of chemicals on the river border based on the results of the monitoring carried out.

In general, the results of monitoring the company's management plan have been going well. This is evidenced by the absence of indications of disturbance to the HCV and that there are still protected species in the company area. There are corrective actions/inputs from the results of monitoring carried out by the company, namely:

- Socialization of HCV and the environment to be carried out continuously to remind community members and employees of the importance of protecting the environment.
- Keep the HCV areas in the company's area.
- Collaborate with communities and employees in safeguarding HCV areas
- Monitoring the HCV management plan for the following year.
- Cooperate with the government in protecting HCV areas.

The results of field observations to the HCV areas in the Tengkalat estate, Gunung Pelawan estate, Gelam estate and Cemara estates revealed that there were no indications of disturbance to the HCV areas. The HCV area is managed by the company by planting, installing an HCV signboard and prohibiting destruction, and interviewing employees understanding that the company protects the HCV area and the presence of animals and plants.

**Major**  
**7.12.4**

**Status: Non conformity NC.2022.01 with major category**

**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>
<b>RC</b>	The company didn't use logo and trademark of RSPO.	√
	<b>Status: Comply</b>	
<b>2.</b>	<b>Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use</b>	<b>X or √</b>
<b>RC</b>	The company didn't use logo and trademark of RSPO.	√
	<b>Status: Comply</b>	
<b>3.</b>	<b>Implementation of Certificate and Trademark is not used on product</b>	<b>X or √</b>
<b>RC</b>	The company didn't use logo and trademark of RSPO.	√
	<b>Status: Comply</b>	
<b>4.</b>	<b>Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.</b>	<b>X or √</b>
<b>RC</b>	The company didn't use logo and trademark of RSPO.	√
	<b>Status: Comply</b>	

### 3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of MP Evans Group PLC 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.

MP Evans Group PLC Time Bound Plan (TBP) is explained in table 1.10. MP Evans Group PLC has sixteen (17) management units with three (3) mills. MP Evans Group PLC has informed the TBP progress, MUTU has considered that MP Evans Group PLC is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by MP Evans Group PLC on 3 October 2022.

MUTU has verified partial certification for un-certified unit's subsidiary of MP Evans Group PLC based on their Time Bound Plan. There are one (1) uncertified mills and six (7) uncertified estates of MP Evans Group PLC. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There are no significant land conflicts which have not been declared above
- The company has followed RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- 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

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Yes and positive assurance is developed under MP Evans Group PLC</p> <p><b>Auditor verification</b> Based on the document review, there is a company internal audit that was conducted on 6 – 7 July 2020. Positive assurance is at this table that is also been verified.</p>
2.1.2	<p>No replacement after dates defined in Nis Criterion 7.3 of:</p> <ul style="list-style-type: none"> <li>• Primary forest.</li> <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>	<ul style="list-style-type: none"> <li>- <b>PT. Simpang Kiri Plantation Indonesia.</b> RACP is not applied for this unit because the last land clearing was conducted before November 2005. The unit does not have mill.</li> <li>- <b>PT. Evans Lestari (PT.EL)</b> has conducted HCV and SIA identification by Forestry Faculty of Institute Pertanian Bogor (IPB) on March 2013 led by Dr. Ir. Jarwadi Budi Hernowo Msc, before land clearing. Therefore the unit has no liability related to RACP. PT Evans Lestari also conducted NPP on 17 December 2013 conducted by Certification Body of Control Union.</li> <li>- <b>PT Bumi Mas Agro:</b> HCV has conduct on 2014 and disclose the land clearing after November 2005 was conducted by non member.</li> </ul> <p><b>Auditor verification</b> Based on internal audit results and evidence provided (communication to RSPO on liability disclosure) the three uncertified units of:</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p><b>PT Simpang Kiri Plantation Indonesia:</b> Last land clearing happened before November 2005 and there is no new land clearing of new planting.</p> <p><b>PT Evans Lestari</b> Land clearing was conducted after November 2005 but has been first conducted HCV identification before land clearing. Liability of disclosure has been sent to RSPO Compensation Team on 23 July 2014.</p> <p><b>PT Bumi Mas Agro</b> Planting year in PT Bumi Mas Agro consist of 2012 to 2017. Previously PT Bumi Mas Agro owned is not RSPO member and since 2017 has been take over by MP Evans Plc (RSPO member).</p>
2.1.3	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<p>There is new planting after 1 Jan 2010 in PT Bumi Mas Agro, which conduct by non member RSPO. Since 2018 PT Bumi Mas Agro has been takeover by RSPO member (MP Evans Plc).</p> <p><b>Auditor verification</b> Based on internal audit, documented time of land clearing and liability disclosure sent to RSPO, there is new planting/land clearing after 1<sup>st</sup> January 2010 for PT Gunung Pelawan Lestari and PT Evans Lestari but NPP has been conducted for these units. Evidence of submission to RSPO is provided and the NPP notification are at RSPO website.</p> <p>PT Bumi Mas Agro has new development after 1 January 2010 without NPP and will be subject to sanction.</p>
2.1.4	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>There is land conflict in PT Bumi Mas Agro and has been resolved.</p> <p><b>Auditor verification</b> Based on evidence provided, the company merely conducted planting on the area that has been compensated from the land owner by FPIC. The documentation of each land compensation/leasing is documented.</p>
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Company has internal and external grievance mechanism. There is labor disputes in PT Bumi Mas Agro and has been documented. There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p><b>Auditor verification</b></p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		There is labor disputes in uncertified unit and resolved process has been documented. There is no information from RSPO website on any labour conflict for uncertified unit of the group subsidiaries and also from stakeholder consultation during 1 <sup>st</sup> surveillance audit of the PT PMM.
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Yes, there is process for land legality.</p> <p><b>Auditor verification</b> Land legal process is still going on and there is a detail update progress documented by the company for each year.</p> <p><b>Update legal for PT Evans Lestari:</b> the company has got plantation business permit (IUP) from Bupati Decree of Musi Rawas No. 891/KPTS/Disbun/2012 dated 12 November 2012 for 20,000 ha. It is in accordance with the scale of the company location permit (Decree of Bupati Musi Rawas No. 578/KPTS/BPM=PTP/2012 dated 30 October 2012 for 20,000 ha). However the location permit has been expired – need further HGU process information or any other legal process.</p>



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

#### 3.4.1. Identification of Findings, Corrective Actions and Observations at ASA-4 Assessment

NCR No.	:		Issued by	:	
Date Issued	:		Time Limit	:	
NC Grade	:		Date of Closing	:	
Standard Ref. & Requirement	:				
Evidence observed (filled by auditor):					
No conformities were found in the RSPO ASA-4 assessment					
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 RC Assessment**

<b>NCR No.</b>	<b>: 2022.01</b>	<b>Issued by</b>	<b>: Radityo Puspanjana</b>
<b>Date Issued</b>	<b>: 11 November 2022</b>	<b>Time Limit</b>	<b>: 9 February 2023</b>
<b>NC Grade</b>	<b>: Major</b>	<b>Date of Closing</b>	<b>: 21 January 2023</b>
<b>Standard Ref. &amp; Requirement</b>	<b>7.12.4</b> <b>HCV and HCS forests after November 15, 2018, peatland and other conservation areas that have been identified, protected and/or enhanced. Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if needed, and are complemented by monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and covers the area that is directly managed and considers the broader level of the relevant landscape (if the landscape has been identified).</b>		
<b>Evidence observed (filled by auditor):</b> Regarding the HCV area management and protection plan, it is contained in several documents, namely: a. PT GPL's 2022 HCV review document explains the HCV management plan by installing HCV signboards such as prohibiting activities that endanger the area, prohibition of hunting, burning, cutting trees and using chemicals, especially in riparian areas. b. SOP document for riparian buffer management Number GPL/SOP/UMUM-15 dated 7 August 2012 which explains: - Small river < 10 meters, HCV area 50 meters to the left and right of the river. - Small river > 10 meters, HCV area 100 meters to the left and right of the river. - Point 3.3.4 for oil palm trees is marked with an X, no need for fertilization and chemical treatments, the saplings and shrubs are allowed to grow naturally. - The company shows PT GPL's 2021-2023 HCV management and monitoring documents which explain that HCV patrols are carried out every month and maintenance of conservation attributes is carried out twice a year. As the implementation of these procedures during the audit process, evidence of the implementation of the plan can be shown, including: - PT GPL's 2022 HCV review document explains the realization of river riparian management, maintenance of HCV boundary signs and HCV signs is carried out every 6 months, the last realization being on 22 April 2022. - HCV patrols for the period July 2021 – June 2022 explained that the conservation area boundary markers on the river bank area were in good condition.  However, based on the results of field visits in the riparian HCV areas, it is known that: - In the HCV area of Evidence Damar block J13 Cemara Estate there is a river that flows throughout the year (result of interviews with field visit facilitators). From the results of observations in the area it is known that there are no signs of a conservation area boundary on the riparian. In that area also found open fertilization activities with the type of MOP. Based on the verification results of the 2013 HCV assessment document, it was explained that the HCV area of Damar Block J13 is a water catchment area that has an important hydrological function that needs to be maintained. - There is a conservation area boundary on the F38 Gelam Estate block riparian (core). In that area, pesticide spraying was also found in the riparia river. This was also confirmed by the results of verification of the pesticide application Foreman Work Form document which also explained that a pesticide application (spraying circle path) had been carried out in block F38 on September 28, 2022.			
<b>Non-Conformance Description (filled by auditor):</b> The company has not been able to show evidence of the implementation of the water resources HCV management plan in accordance with the HCV Management plan and SOP they have.			

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

- The MDP agronomy system that is currently in effect is from the first day of work, the assistant is directly responsible for the division (6 months), after that a briefing is carried out, both theoretically and technically on matters related to company policies and regulations.
- Supervision from field assistants who do not have sufficient understanding of HCV management, especially in riparian areas.

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

- Evaluating the MDP agronomy induction training program to equip the assistants to be ready to work.
- The S&C Assistant provides socialization on spray limits and chemical application in riparian areas / HCV to agronomist assistants and workers who handle chemical application (fertilizer and spray) on a regular basis.
- Bukit Damar HCV area block J13 Cemara Estate.
- Make signs prohibiting spraying and chemical application in the HCV area.
- Paint (red) marks on the outermost palm trees that enter the riparian area along the river flow.
- The HCV Area Block F38 Gelam Estate.
- Repaint the existing spray boundaries and put-up signs prohibiting spraying and chemical application in the HCV area.

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

1. The HR-Training Department monitors the implementation of the new agronomy/assistant MDP induction program along with the materials presented.
2. The S&C assistant and agronomy assistant carry out regular and continuous monitoring of HCV areas to ensure HCV areas are free from spraying and fertilizing activities.

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

**Auditor verification January 21, 2023**

The company shows evidence of improvement in the form of:

**Cemara Estate**

- Minutes of maintenance of riparian dated November 12 2022 made by Krani S&C and known to the estate manager regarding the manufacture/maintenance of riparian by applying red paint to 46 palm oil trees in block J13 division 1 KKPA as a riparian boundary. There are photos of field activities.
- Minutes of outreach related to riparian management to spray employees on 29 November and 1 December 2022 and fertilizer employees on 29 November and 2 December 2022.
- Minutes of outreach related to riparian management to staff on 29 November.

**Gelam estate**

- Minutes of maintenance of riparian dated November 18 2022 which was made by the S&C clerk and known to the estate manager regarding the maintenance of riparian by applying red paint to 46 palm oil trees in block F38 division 1 Gelam estate as a riparian boundary. There are photos of field activities.
- Minutes of outreach related to riparian management to fertilizer and spray employees November 23-24 2022 and a summary of the evaluation of this activity as many as 17 participant.
- Minutes of outreach related to riparian management to staff on 19 November 2022.

**Gunung Pelawan estate**

- Minutes of outreach regarding riparian management to spray and fertilizer employees on 7 -9 December 2022.
- Minutes of outreach related to riparian management to staff on 24 November 2022.

**Tengkalat estate**

- Minutes of outreach related to riparian management to spray and fertilizer employees on 30 November 2022, and a summary of the evaluation of the activity as many as 45 people.
- Minutes of outreach related to riparian management to staff on 23 November 2022.

Based on the evidence of improvement submitted, it can be concluded that this discrepancy has been fulfilled and will be observed again in the next activity.

<b>Follow up on next audit</b> <i>(filled by auditor):</i>	
<b>Verified by</b>	<b>: Radytio Puspanjana</b>

**3.4.3. Opportunity for Improvement**

No	Ref. Std.	Description
1	7.3.2	<p><b>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</b></p> <p>The company has a document IK-35/GPL/2016 regarding Washing of chemical packaging issued on September 27, 2016, the work instruction explains that before being stored in the fertilizer sack warehouse, it must first be washed 3 times.</p> <p>Based on the results of field visits and interviews at the Cemara estate and Pelawan estate fertilizer sack warehouses (Benak area) it was found that there were a number of used fertilizer sacks that had not been washed, according to an explanation from the head of the warehouse this was due to time constraints for fertilizer sack washing officers which were usually carried out by the foreman. Companies are encouraged to ensure the implementation of waste management of used fertilizer sacks as described in the company's work instructions.</p>

**3.4.4. Noteworthy Positive Components**

No.	Description
1	Management commitment to apply the principles of sustainable palm oil management.
2	Good cooperation in providing documents during the audit process.
3	Has received PROPER BLUE period 2020-2021.
4	Has received ISPO and ISCC certificates.
5	Have a biogas installation.

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



Public Issues (Institution/ NGO/Community)	Auditor Verification
<b>Representative of Land National Agency of Bangka Regency.</b> <ul style="list-style-type: none"> <li>Company already has land legality document in form of HGU for estate and smallholder and HGB for POM. There is no reduction of HGU area.</li> <li>There is no land dispute issue.</li> <li>There is no tanah telantar.</li> <li>There are reports of overlapping land issues between PT GPL and PT Timah. This case has reached the Bangka District Attorney level.</li> </ul>	<p>Verification on Report of Overlapping land issues with PT Timah:</p> <ul style="list-style-type: none"> <li>Company shows the Minutes of Land Inspection documents that were carried out on 28 and 30 April 2021 and 3 and 4 May 2021 on PT GPL/Plasma Masyarakat land. The minutes were signed by the Survey Team from PT Timah (4 people) and PT GPL (4 people). There are also photos of land inspection activities.</li> <li>Company shows the Minutes of Land Inspection documents that were carried out 16 September 2021 on PT GPL/Plasma Masyarakat land. The minutes were signed by the Survey Team from PT Timah (4 people) and PT GPL (2 people). There are also photos of land inspection activities.</li> <li>Amendment and Restatement of the Land Use Coordination Agreement in the Context of Granting Letter of Recommendation from PT Timah (persero) Tbk to PT Gunung Pelawan Lestari for the process of HGU No. 370/TBK/SP-0000/14-S11.4 against agreement letter no. 397/Tbk/SP-0000/2013-BI dated 23 September 2013 between PT Timah and PT GPL made on 15 August 2018. This agreement is valid until 31 July 2023 and signed by PT GPL and PT Timah</li> </ul>
<b>Representative of Manpower Agency of Bangka Regency</b> <ul style="list-style-type: none"> <li>There is no issue related to employment violation</li> <li>Collective labor agreement is still valid</li> <li>Company has submit employment report</li> <li>Company already registered their worker union</li> <li>Company has implemented the employment requirement, such as minimum wage and social insurance</li> </ul>	<p>In general, there are no negative issues that need further clarification</p>
<b>Representative of Environment Agency of Bangka Regency</b> <ul style="list-style-type: none"> <li>There is no issue related to environment pollution</li> <li>There is no changes in environment document</li> <li>Company has submitted environment monitoring report.</li> <li>Company already has hazardous waste storage permit and still valid</li> <li>Company already submit HCV report</li> </ul>	<p>In general, there are no negative issues that need further clarification</p>
<b>Representative of Plantation Agency of Bangka Regency</b> <ul style="list-style-type: none"> <li>There is no complaint from surrounding village against operational activity in PT GPL</li> <li>Company already has plantation permit and there is no change/revision. The permit has include the capacity of mill</li> <li>Company already submit the plantation progress report, CSR report, and fire control report periodically</li> </ul>	<p>In general, there are no negative issues that need further clarification</p>
<b>Bipartite of Gelam Estate</b> <ul style="list-style-type: none"> <li>There is no casual daily worker and contract worker.</li> </ul>	<p>In general, there are no negative issues that need further clarification</p>



Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> <li>• Company has paid wage in accordance with minimum wage of 2022. There is no complaint about violence of wage payment.</li> <li>• Company already has wage scale.</li> <li>• PPE and work tools provide by company. If PPE and work tools are in damage, it can be changed by company.</li> <li>• Company has conduct medical check-up for all workers.</li> <li>• Collective labour agreement is still applicable.</li> <li>• There is no work accident with fatality or major category.</li> <li>• There is no intervention from company against all union activity. Workers voluntarily in choosing the union membership.</li> </ul>	
<b>Gender Committee of Tengkalat and Gelam Estate</b> <ul style="list-style-type: none"> <li>• Committee gender activity is Posyandu (integrated healthcare center), program for pregnant women, and distribution of blood boosting tablets. These activities is conducted once a month.</li> <li>• There is no complaint related to immoral action.</li> <li>• Company provides maternity leaves and menstrual leave for woman worker.</li> </ul>	In general, there are no negative issues that need further clarification
<b>Gender committee of Cemara Estate</b> <ul style="list-style-type: none"> <li>• During 2021 to 2022 there were no reports of sexual harassment of female workers</li> <li>• There has been socialization regarding the rights of women workers, including menstrual leave, the right to breastfeed children at work, pregnancy check-ups,</li> <li>• There is no discrimination in employment opportunities and promotion opportunities for female workers</li> <li>• There is women's types of work are adapted to women's nature and have minimal risk to reproductive health, such as pesticide applicator, manual upkeep and administration.</li> <li>• The gender committee routinely identifies pregnant and lactating women, to ensure that female workers can work properly</li> </ul>	In general, there are no negative issues that need further clarification
<b>Gender committee of Gunung Pelawan Estate</b> <ul style="list-style-type: none"> <li>• During 2021 to 2022 there were no reports of sexual harassment of female workers</li> <li>• There has been socialization regarding the rights of women workers, including menstrual leave, the right to breastfeed children at work, pregnancy check-ups,</li> <li>• There is no discrimination in employment opportunities and promotion opportunities for female workers</li> </ul>	In general, there are no negative issues that need further clarification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> <li>There is women's types of work are adapted to women's nature and have minimal risk to reproductive health, such as pesticide applicator, manual upkeep and administration.</li> <li>The gender committee routinely identifies pregnant and lactating women, to ensure that female workers can work properly</li> </ul>	
<b>Representative of Mapur and Gunung Muda Village</b> <ul style="list-style-type: none"> <li>Company give assistance to village by submitted proposal.</li> <li>Company has give a visit to village for identify the village need</li> <li>There is no environment pollution and land dispute issue.</li> <li>Many villagers work in company.</li> </ul>	<p>In general, there are no negative issues that need further clarification. Has been described in indicator 4.3.1</p>
<b>Previous Land Owner (Mapur Village and Gunung Muda Village)</b> <ul style="list-style-type: none"> <li>Land compensation was conduct through FPIC process. There is no reclaim from previous land owner.</li> <li>Land owners sell voluntarily at a mutually agreed price.</li> </ul>	<p>In general, there are no negative issues that need further clarification</p>
<b>(FFB Supplier on behalf Hendra Gunawan)</b> <b>Dated 7 November 2022</b> <p>The company receives FFB from third parties provided that FFB supplied is not the result of looting, theft or FFB produced by looting state forests. It is stated in the agreement based on the agreement between the two parties, further explained that the payment was made on time in accordance with the contents of the agreement and there had never been a problem in terms of payment. The FFB price refers to the price Plantation Agency. The compliance with OHS standards such as the provision of PPE and payment for health assurance conducted by FFB supplier.</p>	<p>The company has demonstrated its commitment and mechanism so that FFB received is not from illegal activities. in addition, documentation has been shown that the payment of the contractor's results has been paid according to the agreement and on time. Described in detail in criteria related.</p>
<b>Workers Union PT. GPL</b> <ul style="list-style-type: none"> <li>Determination of the minimum wage at PT GPL for 2022 based on the Bangka Belitung Provincial Minimum Wage for 2022.</li> <li>The company has implemented overtime in accordance with applicable regulations.</li> <li>The company has registered all workers in the BPJS program</li> <li>The company has conducted special and periodic (general) health checks on a regular basis</li> <li>There have been no serious or fatal work accidents in the last 2 years</li> <li>PPE has been provided free of charge and replaced if damaged</li> <li>Complaints to the company are only related to housing complaints and have been followed up by the company.</li> </ul>	<p>There are no negative issues that need further verification</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> <li>The company has implemented a wage, overtime and employment system that complies with applicable regulations.</li> </ul>	
<b>FFB transport contractor (CV Tiara Mapur)</b> <ul style="list-style-type: none"> <li>The company has provided socialization regarding the obligation to comply with regulations by contractors to contractor workers</li> <li>Wages for contractor workers refer to the applicable minimum wage</li> <li>Contractor workers have been included in the BPJS program</li> <li>There are no complaints to the company</li> <li>All work and payments are in accordance with the agreement of both parties.</li> </ul>	<p>There are no negative issues that need further verification</p>
<b>CPO/PK transport contractor</b> <ul style="list-style-type: none"> <li>The company has provided socialization regarding the obligation to comply with regulations by contractors to contractor workers</li> <li>Wages for contractor workers refer to the applicable minimum wage</li> <li>Contractor workers have been included in the BPJS program</li> <li>There are no complaints to the company</li> <li>All work and payments are in accordance with the agreement of both parties.</li> <li>The company has provided outreach regarding work procedures, OHS, RSPO and others. The contractor is also willing to be audited by an auditing agency if necessary.</li> </ul>	<p>There are no negative issues that need further verification</p>

<b>4.0</b>	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>
<b>4.1</b>	<b>Formal Sign-off of Assessment Findings</b>
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p style="text-align: center;">Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end; margin-top: 100px;"> <div style="text-align: center;"> <p>PT Gunung Pelawan Lestari Management Representative</p>  <p><b><u>Arvind Devadasan</u></b> Monday, 23 January 2023</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><b><u>Rizliani Aprianita Hasibuan</u></b> Monday, 23 January 2023</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Bangka Regency Manpower and Transmigration Office	Bangka Regency	-	Consultation Public Via Telephone	8 November 2022	✓	-
2	Bangka Regency Plantation Office	Bangka Regency	-	Consultation Public Via Telephone	8 November 2022	✓	-
3	Bangka Regency Environmental Agency	Bangka Regency	-	Consultation Public Via Telephone	8 November 2022	✓	-
4	National Land Agency Office.	Bangka Regency	-	Consultation Public Via Telephone	8 November 2022	✓	-
5	Representative of Gunung Muda and Mapur Village	Bangka Regency	-	Consultation Public Via Telephone	8 November 2022	✓	-
6	Previous Land Owner	Bangka Regency	-	Consultation Public Via Telephone	8 November 2022	✓	-
7	FFB Agent Supplier (Hendra Gunawan)	Bangka Regency	-	Consultation Public Via Telephone	8 November 2022	✓	-
8	Tengkalat POM: - 1 WB Operator - 1 Security - 2 Warehouse Officer - 1 WTP Operator. - 1 Operator WWTP - 1 Operator Land Application - 1 Operator Biogas plant. - 1 worker in Housing. - 1 personel St. Press - 2 Personel St. Loading Ramp - 1 Personel St. Boiler - 1 Personel St. Engine Room	Bangka Regency	-	Direct Interview	8 November 2022	✓	-
9	Tengkalat Estate - 2 Harvester and Loss Fruit Picker - 2 Manual Weeding Worker - 4 Manuring Worker and 1 foreman - 3 Pesticide applicator - 1 warehouse officer - 1 mechanic (workshop) - 4 daycare officer	Bangka Regency	-	Direct Interview	8 November 2022	✓	-

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
	- 1 paramedic						
10	Cemara Estate & KKPA: - 4 spraying workers - 3 harvester - 3 loose fruit picker - 3 manuring workers - 2 FFB loading workers	Bangka Regency	-	Direct Interview	9 November 2022	√	
11	Gelam Estate: - 11 Harvester and Loss Fruit Picker - 3 Manuring Worker - 3 Selective Weeding Personel - 2 Pesticide aplicator	Bangka Regency	-	Direct Interview	9 November 2022	√	-
12	Gunung Pelawan Estate - 3 Harvester - 2 Manuring worker - 2 Pesticide aplicator	Bangka Regency	-	Direct Interview	10 November 2022	√	
13	Gender Committee: - Gender Committee Head of TGE and TGM - Gender Committee Head of CME - Gender Committee Head of GPE	Bangka Regency	-	Direct Interview	07 November 2022	√	-
14	Worker Union & Bipartite of Gelam Estate	Bangka Regency	-	Direct Interview	07 November 2022	√	-
15	WALHI	DKI Jakarta	-	via e-mail	24 October 2022		√
16	WWF	DKI Jakarta	-	via e-mail	24 October 2022		√
17	Sawit Watch	Jawa Barat Province	-	via e-mail	24 October 2022		√
18	AMAN	DKI Jakarta	-	via e-mail	24 October 2022		√



## Appendix 2. Assessment Program

[illegible]

DATE	07 to 12 November 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 12.00	<p><b>Field Observation to Gelam Estate &amp; Gelam KKPA</b> Aspect to be verified:</p> <ul style="list-style-type: none"> <li>• Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li> <li>• Implementation of Environmental and Conservation/HCV management.</li> <li>• Implementation of Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Clinic and Waste Management).</li> <li>• Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> </ul> <p><b>Field Observation to Cemara Estate &amp; Cemara KKPA</b> Aspect to be verified:</p> <ul style="list-style-type: none"> <li>• Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li> <li>• Implementation of Environmental and Conservation/HCV management.</li> <li>• Implementation of Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Clinic and Waste Management).</li> <li>• Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> </ul>	<p><b>AAS/DWN</b></p> <p><b>RDP</b></p> <p><b>RAH</b></p>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 17.00	<ul style="list-style-type: none"> <li>• Continue stakeholder consultation if needed</li> <li>• Document review and completing audit checklist.</li> <li>• Presentation of daily progress</li> </ul>	<b>All Auditor</b>
<b>Thursday, 10 November 2022</b>		
08.00 – 12.00	<p><b>Field Observation to Gunung Pelawan Estate &amp; Gunung Pelawan KKPA</b> Aspect to be verified:</p> <ul style="list-style-type: none"> <li>• Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li> <li>• Implementation of Environmental and Conservation/HCV management.</li> <li>• Implementation of Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Clinic and Waste Management).</li> <li>• Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> </ul>	<p><b>AAS</b></p> <p><b>RDP</b></p> <p><b>DWN/RAH</b></p>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 17.00	<ul style="list-style-type: none"> <li>• Document review and completing audit checklist.</li> <li>• Presentation of daily progress</li> </ul>	<b>All Auditor</b>
<b>Friday, 11 November 2022</b>		
08.00 – 12.00	<ul style="list-style-type: none"> <li>• Document review and completing audit checklist.</li> <li>• Presentation of daily progress</li> </ul>	<b>All Auditor</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>

DATE	07 to 12 November 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
14.00 – 15.00	Internal Discussion	All Auditor
15.00 – 17.00	<b>Closing Meeting :</b> <ul style="list-style-type: none"> <li>• Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timelie of CAR's, Conclusion)/</li> <li>• Comments, Responses and Questions</li> </ul>	All Auditor
<b>Saturday, 12 November 2022</b>		
08.00 – 10.00	<b>SITE → PANGKAL PINANG</b>	All Auditor
11.20 – 12.30	<b>PANGKAL PINANG (PGK) → JAKARTA (CGK) – ID 6847</b>	All Auditor