

*Roundtable on Sustainable Palm Oil Certification
RSPO*

[✓] Surveillance

Name of Management : **Subur Arum Makmur POM, PT Subur Arum Makmur subsidiary of First Resources Ltd**
 Organisation
 Plantation Name : PT Subur Arum Makmur: Subur Arum Makmur Estate & PT Arindo Trisejahtera : Petapahan-1 Estate & Petapahan-2 Estate
 Location : Danau Lancang Village, Tapung Hulu Sub District, Kampar District, Riau Province, Indonesia
 Certificate Code : **MUTU-RSPO/143**
 Date of Certificate Issue : 26 February 2020 Date of License Issue : 26 May 2023
 Date of Certificate Expiry : 25 February 2025 Date of License Expiry : 25 February 2024

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-3	13 to 17 February 2023	Briyogi Shadiwa (Lead Auditor), Erika Lucitawati, Firda Tarunajaya and Sabiah Dhiningtyas Utami	Hasiholan Sihombing	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-3	19 May 2023

TABLE OF CONTENT
FIGURE

Figure 1. Location Map of PT Subur Arum Makmur	1
Figure 2. Location Map of PT Arindo Trisejahtera	2
Figure 3. Operational Map of PT Subur Arum Makmur	3
Figure 4. Operational Map of PT Arindo Trisejahtera	4
Abbreviations Used	5

1.0 SCOPE of the CERTIFICATION ASSESSMENT

1.1 Assessment Standard Used	7
1.2 Organisation Information	7
1.3 Type of Assessment	7
1.4 Location of Mill and Plantations	7
1.5 Description of Area Statement	8
1.6 Planting Year and Cycle	8
1.7 Description of Mill and Supply Base	9
1.8 Estimate Tonnage of Certified Product	9
1.9 Other Certifications	10
1.10 Time-Bound Plan	10

2.0 ASSESSMENT PROCESS

2.1 Assessment Team	14
2.2 Assessment Methodology, Assessment Process and Locations of Assessment	14
2.3 Stakeholder Consultation and Stakeholders Contacted	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	76
3.3 Summary of RSPO Partial Certification	77
3.4 Identification of Findings, Corrective Actions, Observations, Opportunity for Improvement and Noteworthy Positive Components	80
3.5 Summary of Arising Issues from Public and Auditor Verification	103

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

4.1 Formal Signing of Assessment Findings	106
---	-----

APPENDICES

1. List of Stakeholders Contacted in the RSPO Certification Process	107
2. Assessment Program	110

Figure 1. Location Map of PT Subur Arum Makmur

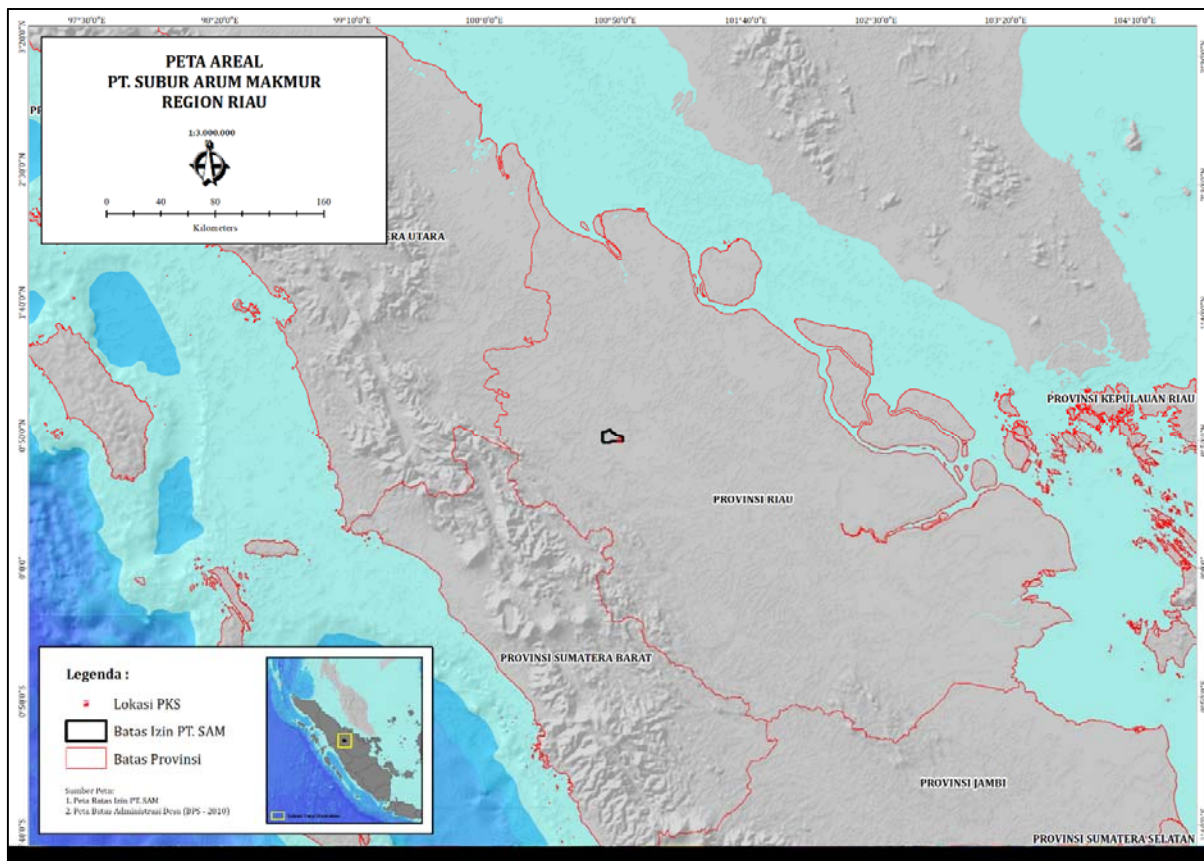


Figure 2. Location Map of PT Arindo Trisejahtera

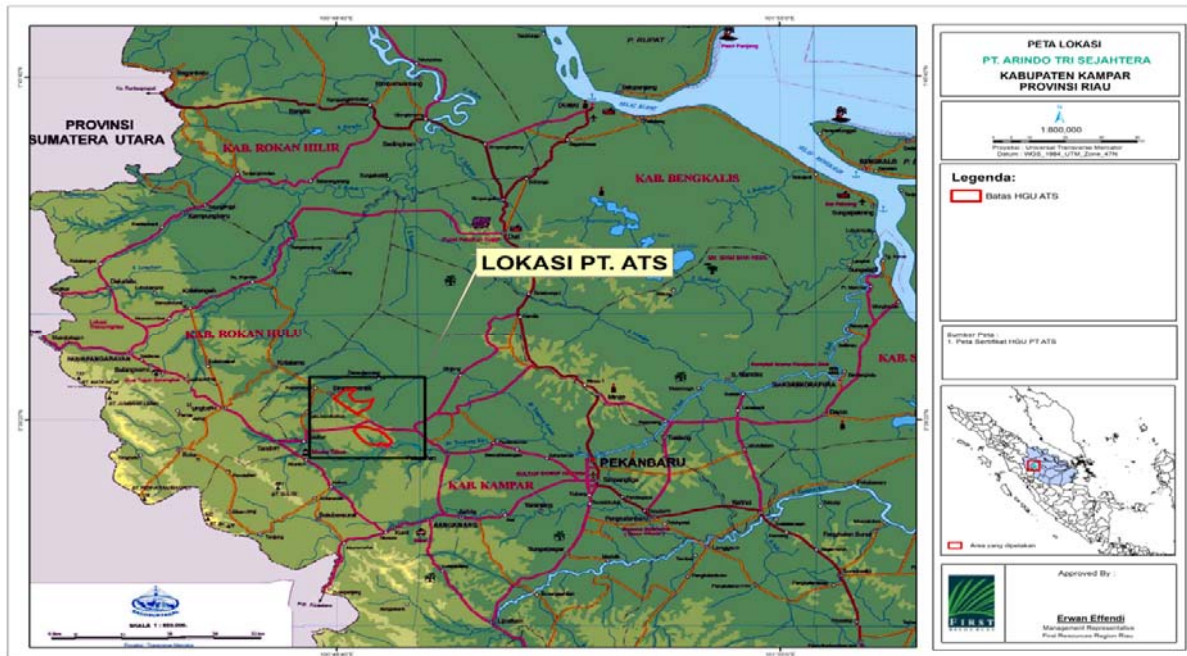


Figure 3. Operational Map of PT Subur Arum Makmur

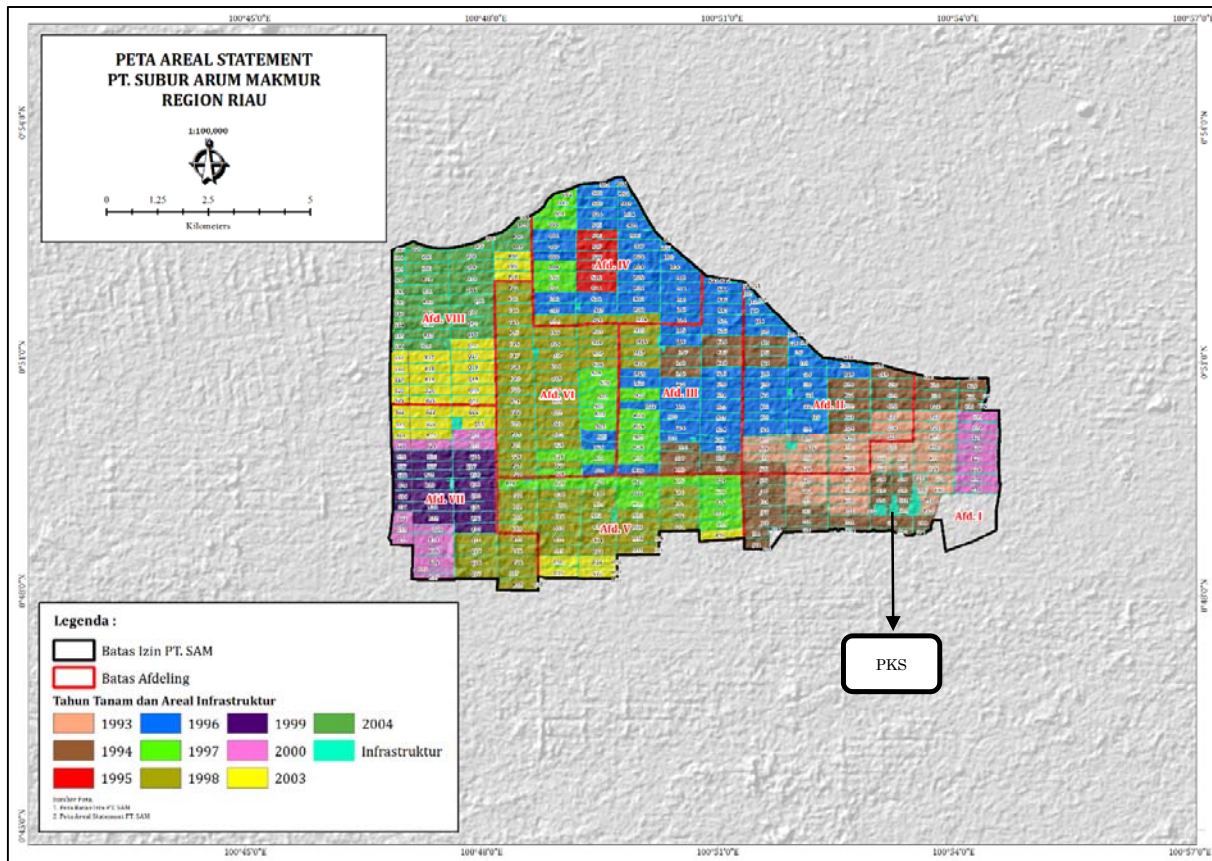
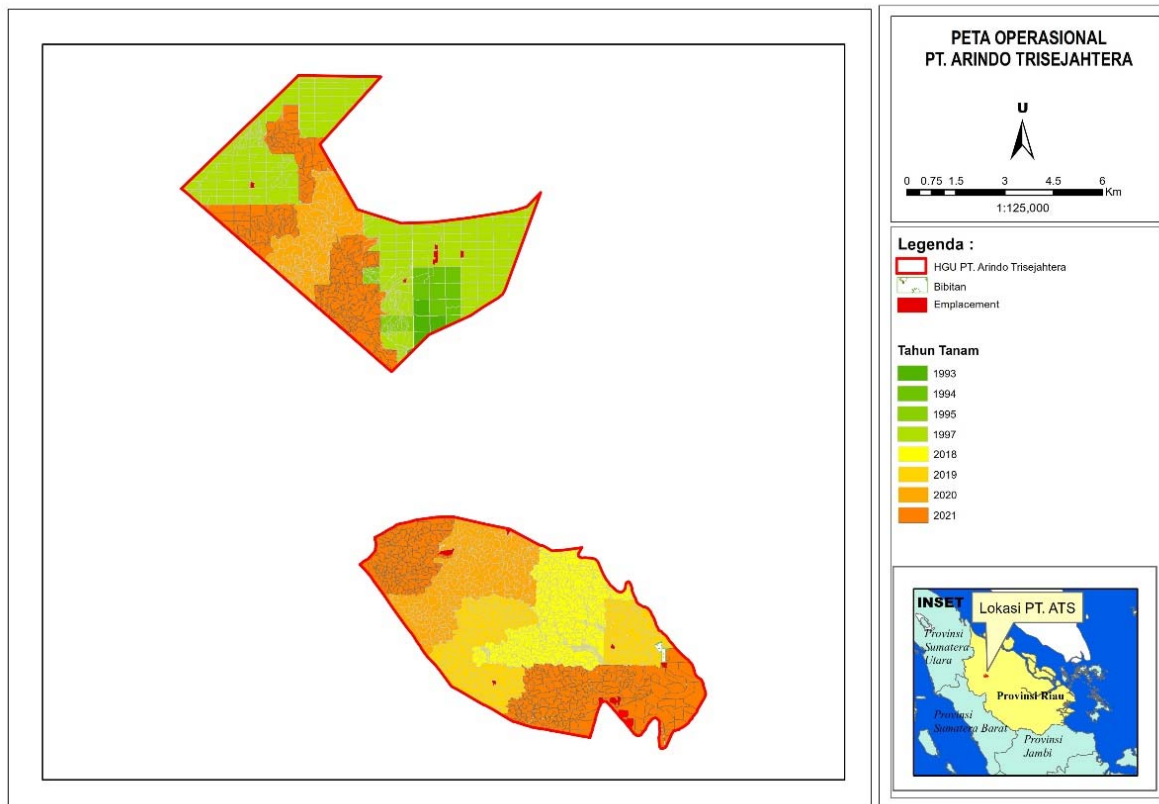


Figure 4. Operational Map of PT Arindo Trisejahtera



Abbreviations Used

ACOP	:	Annual Communication of Progress
ANDAL	:	<i>Analisis Dampak Lingkungan</i> (Environmental impact analysis)
ASA	:	Annual Surveillance Audit
BOD	:	Biological Oxygen Demand
BSP	:	Bumi Sawit Perkasa
B3	:	Hazardous Material
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Insurance)
CEO	:	Chief executive officer
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
EFB	:	Empty Fruit Bunch
EWS	:	Early Warning System
FFA	:	Free Fatty Acid
FFB	:	Fresh Fruit Bunch
FR	:	First Resources / Frequency Rate
GHG	:	Green House Gases
GRTT	:	<i>Ganti Rugi Tanam Tumbuh</i> (land compensation)
GSI	:	Gerbang Sawit Indah
HCV	:	High Conservation Value
HGU	:	Cultivation Rights
HPHTC	:	<i>Hak Pengusahaan Hutan Tanaman Campuran</i> (Mixed Plantation Forest Concession Rights)
HSE	:	Health, Safety and Environment
IPM	:	Integrated Pest Management
ISPO	:	Indonesian Sustainable Palm Oil
IUP	:	Plantation business license
K3L	:	OHS and Environment
KER	:	Kernel Extraction Rate
KKPA	:	<i>Kredit Koperasi Primer untuk Anggota</i> (Primary Cooperative Credit for Members)
KSBSI	:	<i>Konfederasi Serikat Buruh Sejahtera Indonesia</i>
LA	:	Land Application
LB3	:	Hazardous Waste
LSU	:	Leaf Sampling Unit
LUCA	:	Land Use Change Analysis
Muspika	:	Musyawarah Pimpinan Kecamatan (District Leadership Conference)
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
OSS	:	Online Single Submission
P2K3	:	OHS Committee
PK	:	Palm Kernel
<i>Permen LHK</i>	:	<i>Peraturan Menteri Lingkungan dan Kehutanan</i> (Ministry of Environment and Forestry Regulation)
POME	:	Palm Oil Mill Effluent
PPE	:	Personal protective equipment
PSA	:	Panca Surya Agrindo
RKL-RPL	:	<i>Rencana Kelola Lingkungan – Rencana Pemantauan Lingkungan</i> (Environment Management and Monitoring Plan)
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened, Endangered
SAM	:	Subur Arum Makmur

SHM	:	<i>Sertifikat Hak Milik (Freehold Title)</i>
SIMPEL	:	Electronic Reporting System
SMP	:	Swadaya Mukti Perkasa
SOP	:	Standard Operating Procedure
SP3SPSI	:	<i>Serikat Pekerja Pertanian dan Perkebunan Serikat Pekerja Seluruh Indonesia</i>
SPSI	:	<i>Serikat Pekerja Seluruh Indonesia</i>
SR	:	Severity Rate
SSU	:	Soil Sampling Unit
PT ATS	:	PT Arindo Trisejahtera
UMK	:	<i>Usaha Mikro dan Kecil (Micro and small enterprises)</i>
UPDKS	:	<i>Ulat Pemakan Daun Kelapa Sawit</i>
UPTD	:	<i>Unit Pelaksana Teknis Daerah (Regional Technical Implementation Unit)</i>
WHO	:	World Health Organization
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE OF THE CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used		
		<ul style="list-style-type: none">• RSPO Certifications Systems for Principles & Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020).• Indonesia National Interpretation RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSPO Board of Governors on 20th April 2020.	
1.2	Organisation Information		
1.2.1	Organization name listed in the certificate	Subur Arum Makmur POM, PT Subur Arum Makmur subsidiary of First Resources Ltd	
1.2.2	Contact person	Eko Darmawanto	
1.2.3	Organisation address and site address	<ul style="list-style-type: none">• RSPO registered company: 8 Temasek Boulevard #36-02 Suntec Tower Three. Singapore 038988.• Liaison Office: APL Tower – Central Park, 28th Floor. Podomoro City, Jl. Letjend S.Parman Kav. 28 Grogol-Petamburan, Jakarta Barat 11470, Indonesia	
1.2.4	Telephone	(021) 2929 8888	
1.2.5	Fax	(021) 2929 8878	
1.2.6	E-mail	eko.darmawanto@first-resources.com	
1.2.7	Web page address	http://www.first-resources.com	
1.2.8	Management Representative who completed the application for certification	Eko Darmawanto	
1.2.9	Registered as RSPO member	1-0047-08-000-00 (10 March 2008)	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Subur Arum Makmur POM and 3 Supply Base: <ul style="list-style-type: none">• PT Subur Arum Makmur (Subur Arum Makmur Estate)• PT Arindo Trisejahtera (Petapahan-1 Estate & Petapahan-2 Estate)	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude
			Longitude
	Subur Arum Makmur Mill	Danau Lancang Village, Tapung Hulu Sub District, Kampar District, Riau Province, Indonesia	N 00° 49' 01"
			E 100° 53' 18"
1.4.2	Location of Certification Scope of Supply Base		

Name of Supply Base	Location	Coordinate	
		Latitude	Longitude
Subur Arum Makmur Estate	Danau Lancang Village, Tapung Hulu Sub District, Kampar District, Riau Province, Indonesia	N 00° 49' 01"	E 100° 53' 18"
Petapahan 1	Rimba Beringin Village, Tapung Hulu Subdistrict, Kampar District, Riau Province, Indonesia	N 0° 34' 51"	E 100° 55' 29"
Petapahan 2	Senamanenek Village, Tapung Hulu Subdistrict, Kampar District, Riau Province, Indonesia	N 0° 42' 18"	E 100° 51' 57"

1.5 Description of Area Statement

1.5.1	Tenure	
	• State	17,647.24 Ha
	• Community	

1.5.2 Area Statement

	Subur Arum Makmur	Petapahan-1	Petapahan-2	Total (Ha)
Total area	9,271.00	4,270.00	4,106.24	17,647.24
Mature area	8,589.58	882.99	2,012.32	11,484.89
Immature area	-	3,080.31	1,828.21	4,908.52
Infrastructure	476.76	285.73	256.38	1,018.87
Oil Mill Site	11.66	11.64	-	23.30
Occupation	193.00	-	-	193.00
Conservation	-	9.33	9.33	18.66

* Total conservation area of unit of certification is 97.05 ha and has been categorized as conservation area of 18.66 ha and conservation potential of 78.39 ha. Conservation potential area is in form of riparian area has been included in planted area in ASA-3.

1.6 Planting Year and Cycles
1.6.1 Age profile of planting year

Planting Year	Hectarage (Ha)			
	Subur Arum Makmur	Petapahan-1	Petapahan-2	Total (Ha)
1993	764.69	-	97.55	862.24
1994	1,097.04	13.00	213.50	1,323.54
1995	140.59	-	-	140.59
1996	1,805.40	-	-	1,805.40
1997	814.27	2.63	1,701.27	2,518.17
1998	1,809.06	-	-	1,809.06
1999	418.87	-	-	418.87
2000	446.75	-	-	446.75
2003	692.02	-	-	692.02
2004	600.89	-	-	600.89
2018	-	867.36	-	867.36
Total Mature	8,589.58	882.99	2,012.32	11,484.89
2019	-	836.34	-	836.34
2020	-	850.08	554.55	1,404.63
2021	-	1,393.89	953.89	2,347.78

	2022	-	-	319.77	319.77			
	Total Immature	-	3,080.31	1,828.21	4,908.52			
	TOTAL	8,589.58	3,963.30	3,840.53	16,393.41			
1.6.2	New Planting area after January 2010		- Ha					
1.6.3	Planting Cycle		1 st & 2 nd Cycle					
1.7	Description of Mill and Supply Base							
1.7.1	Description of Mill							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO Out put (tonnes)	Extraction (%)	Palm Kernel Out put (tonnes)	Extraction (%)	
	Subur Arum Makmur	90	345,209.48	71,010.24	20.57	20,068.54	5.81	
	*Production data source from February 2022 to January 2023							
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)		%
	Subur Arum Makmur	9,271.00	8,589.58	200,184.32	23.31	200,184.32		100
	Petapahan-1	4,270.00	882.99	28,373.36	32.13	28,373.36		100
	Petapahan-2	4,106.24	2,012.32	38,811.46	19.29	38,811.46		100
	TOTAL	17,647.24	11,484.89	267,369.14	23.28	267,369.14		100
	*Production data source from February 2022 to January 2023							
1.7.3	FFB description from other source							
	Name of sources/Organisation (RSPO certified / non-certified)	Type of Organization	number of smallholders	Production Area (Ha)	Supplied to Mill FFB (tonnes/year)			
	KKPA BSP	First Resources Ltd (Plasma of PT Bumi Sawit Perkasa)	-	-	44,892.23			
	PT Bumi Sawit Perkasa	First Resources Ltd	-	-	32,856.10			
	TOTAL				77,748.33			
	*Production data source from February 2022 to January 2023							
1.7.4	Product categories			FFB, CPO, PK				
1.8	Tonnage of Product							
1.8.1	Past Annual Claim Certified Product			Last Year Projected Certified Volume (26 March 2022 – 25 February 2023) (Ton)		Actual Certified Volume from March 2022 to January 2023 (Ton)		
	FFB Processed			283,000		228,852.89		
	CPO Production			62,260		47,032.59		
	Palm Kernel (PK) Production			14,150		13,248.12		
1.8.2	Product selling							

	Type of selling product			Actual selling product for last year (March 2022 to January 2023) (MT)				
	CSPO sold as RSPO certified product			983.29				
	CSPK sold as RSPO certified product			9,703.74				
	CSPO sold under another scheme			34,734.93				
	CSPK sold under another scheme			-				
	CSPO sold as conventional							
	CSPK sold as conventional			-				
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates	Total Area (Ha)	Production Area (Ha)	FFB (tones/year)	Yield (tones/ha/year)			
	Subur Arum Makmur	9,271.00	8,589.58	197,500	22.99			
	Petapahan-1	4,270.00	882.99	28,200	31.94			
	Petapahan-2	4,106.24	2,012.32	40,200	19.98			
	TOTAL	17,647.24	11,484.89	265,900	23.15			
	*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 Out put (tones)	Extraction (%)	Palm Kernel Out put (tones)	Extraction (%)	Supply Chain Module
	Subur Arum Makmur POM	90	265,900	55,800	20.90	15,500	5.82	MB
	*Projected CSPO and CSPK production for 12 months of certificate							
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			EU-ISCC-Cert-ID230-20220018 valid until 14 July 2023				
	Others			PT Subur Arum Makmur: 003/MHI-ISPO valid until 22 July 2025 PT Arindo Trisejahtera : 0001/MHI-ISPO valid until 21 March 2024				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	MILL	Time Bound Plan						
	PT Arindo Trisejahtera	2018	PT Arindo Trisejahtera	2018	Riau, Indonesia	Certified		
	PT Meridan Seiatisurva	2018	PT Meridan Seiatisurva	2018	Riau, Indonesia	Certified		

Plantation		Plantation			
PT Subur Arum Makmur	2020	PT Subur Arum Makmur	2020	Riau, Indonesia	Certified
PT Surya Intisari Raya	2021	PT Surya Intisari Raya	2021	Riau, Indonesia	IC
PT Perdana Intisawit Perkasa	2021	PT Perdana Intisawit Perkasa	2021	Riau, Indonesia	IC
PT Ketapang Agro Lestari	2021	PT Ketapang Agro Lestari	2021	East Kalimantan, Indonesia	IC
PT Limpah Sejahtera	2021	PT Limpah Sejahtera	2021	West Kalimantan, Indonesia	Planned
PT Panca Surya Agrindo	2021	PT Panca Surya Agrindo	2021	Riau, Indonesia	IC
PT Swadaya Mukti Prakarsa	2021	PT Swadaya Mukti Prakarsa	2021	West Kalimantan, Indonesia	Planned
PT Mitra Karya Sentosa 2	2022	PT Mitra Karya Sentosa 2	2022	West Kalimantan, Indonesia	Planned
PT Citra Agro Kencana	2022	PT Citra Agro Kencana	2022	East Kalimantan, Indonesia	Planned
PT Borneo Persada Energy Jaya	2022	PT Borneo Persada Energy Jaya	2022	East Kalimantan, Indonesia	Planned
PT Borneo Surya Mining Jaya	2022	PT Borneo Surya Mining Jaya	2022	East Kalimantan, Indonesia	Planned
PT Umekah Sari Pratama	2023	PT Umekah Sari Pratama	2023	West Kalimantan, Indonesia	Planned
PT Mitra Karya Sentosa 1	2023	PT Mitra Karya Sentosa 1	2023	West Kalimantan, Indonesia	Planned
PT Muriniwood Indah Industry	2023	PT Muriniwood Indah Industry	2023	Riau, Indonesia	Planned
PT Ciliandra Perkasa	2023	PT Ciliandra Perkasa	2023	Riau, Indonesia	Planned
PT Subur Arum Makmur 2	2024	PT Subur Arum Makmur 2	2024	Riau, Indonesia	Planned
PT Perdana Intisawit Perkasa 2	2024	PT Perdana Intisawit Perkasa 2	2024	Riau, Indonesia	Planned
PT Meridan Sejatisurya Plantation – BA	2024	PT Meridan Sejatisurya Plantation – BA	2024	Riau, Indonesia	Planned
PT Priatama Riau	2024	PT Priatama Riau	2024	Riau, Indonesia	Planned
PT Falcon Agri Persada	2024	PT Falcon Agri Persada	2024	West Kalimantan, Indonesia	Planned
PT Setia Agrindo Mandiri	2025	PT Setia Agrindo Mandiri	2025	Riau, Indonesia	Planned
PT Surya Dumai Agrindo	2025	PT Surya Dumai Agrindo	2025	Riau, Indonesia	Planned
PT Pulau Tiga Lestari Jaya	2025	PT Pulau Tiga Lestari Jaya	2025	West Kalimantan, Indonesia	Planned

PT Borneo Ketapang Permai	2025	PT Borneo Ketapang Permai	2025	West Kalimantan, Indonesia	Planned
PT Gerbang Sawit Indah	2025	PT Gerbang Sawit Indah	2025	Riau, Indonesia	Planned
PT Indogreen Jaya Abadi	2026	PT Indogreen Jaya Abadi	2026	Riau, Indonesia	Planned
PT Setia Agrindo Lestari	2026	PT Setia Agrindo Lestari	2026	Riau, Indonesia	Planned
PT Citra Palma Kencana	2026	PT Citra Palma Kencana	2026	Riau, Indonesia	Planned
PT Karya Tama Bakti Mulia	2026	PT Karya Tama Bakti Mulia	2026	Riau, Indonesia	Planned
PT Bumi Sawit Perkasa	2026	PT Bumi Sawit Perkasa	2026	Riau, Indonesia	Planned
PT Maha Karya Bersama	2026	PT Maha Karya Bersama	2026	East Kalimantan, Indonesia	Planned
PT Arindo Trisejahtera	2018	PT Arindo Trisejahtera	2018	Riau, Indonesia	Certified
PT Meridan Sejatisurya Plantation	2018	PT Meridan Sejatisurya Plantation	2018	Riau, Indonesia	Certified
PT Subur Arum Makmur	2020	PT Subur Arum Makmur	2020	Riau, Indonesia	Certified
PT Surya Intisari Raya	2021	PT Surya Intisari Raya	2021	Riau, Indonesia	IC
PT Perdana Intisawit Perkasa	2021	PT Perdana Intisawit Perkasa	2021	Riau, Indonesia	IC
PT Ketapang Agro Lestari	2021	PT Ketapang Agro Lestari	2021	East Kalimantan, Indonesia	IC
PT Limpah Sejahtera	2021	PT Limpah Sejahtera	2021	West Kalimantan, Indonesia	Planned
PT Panca Surya Agrindo	2021	PT Panca Surya Agrindo	2021	Riau, Indonesia	IC
PT Swadaya Mukti Prakarsa	2021	PT Swadaya Mukti Prakarsa	2021	West Kalimantan, Indonesia	Planned
PT Mitra Karya Sentosa 2	2022	PT Mitra Karya Sentosa 2	2022	West Kalimantan, Indonesia	Planned
PT Citra Agro Kencana	2022	PT Citra Agro Kencana	2022	East Kalimantan, Indonesia	Planned
PT Borneo Persada Energy Jaya	2022	PT Borneo Persada Energy Jaya	2022	East Kalimantan, Indonesia	Planned
PT Borneo Surya Mining Jaya	2022	PT Borneo Surya Mining Jaya	2022	East Kalimantan, Indonesia	Planned
PT Umekah Sari Pratama	2023	PT Umekah Sari Pratama	2023	West Kalimantan, Indonesia	Planned
PT Mitra Karya Sentosa 1	2023	PT Mitra Karya Sentosa 1	2023	West Kalimantan, Indonesia	Planned
PT Muriniwood Indah Industry	2023	PT Muriniwood Indah Industry	2023	Riau, Indonesia	Planned

	PT Ciliandra Perkasa	2023	PT Ciliandra Perkasa	2023	Riau, Indonesia	Planned
	PT Subur Arum Makmur 2	2024	PT Subur Arum Makmur 2	2024	Riau, Indonesia	Planned
	PT Perdana Intisawit Perkasa 2	2024	PT Perdana Intisawit Perkasa 2	2024	Riau, Indonesia	Planned
	PT Meridan Sejatisurya Plantation – BA	2024	PT Meridan Sejatisurya Plantation – BA	2024	Riau, Indonesia	Planned
	PT Priatama Riau	2024	PT Priatama Riau	2024	Riau, Indonesia	Planned
	PT Falcon Agri Persada	2024	PT Falcon Agri Persada	2024	West Kalimantan, Indonesia	Planned
	PT Setia Agrindo Mandiri	2025	PT Setia Agrindo Mandiri	2025	Riau, Indonesia	Planned
	PT Surya Dumai Agrindo	2025	PT Surya Dumai Agrindo	2025	Riau, Indonesia	Planned
	PT Pulau Tiga Lestari Jaya	2025	PT Pulau Tiga Lestari Jaya	2025	West Kalimantan, Indonesia	Planned
	PT Borneo Ketapang Permai	2025	PT Borneo Ketapang Permai	2025	West Kalimantan, Indonesia	Planned
	PT Gerbang Sawit Indah	2025	PT Gerbang Sawit Indah	2025	Riau, Indonesia	Planned
	PT Indogreen Jaya Abadi	2026	PT Indogreen Jaya Abadi	2026	Riau, Indonesia	Planned
	PT Setia Agrindo Lestari	2026	PT Setia Agrindo Lestari	2026	Riau, Indonesia	Planned
	PT Citra Palma Kencana	2026	PT Citra Palma Kencana	2026	Riau, Indonesia	Planned
	PT Karya Tama Bakti Mulia	2026	PT Karya Tama Bakti Mulia	2026	Riau, Indonesia	Planned
	PT Bumi Sawit Perkasa	2026	PT Bumi Sawit Perkasa	2026	Riau, Indonesia	Planned
	PT Maha Karya Bersama	2026	PT Maha Karya Bersama	2026	East Kalimantan, Indonesia	Planned
	<i>*TBP is approve by RSPO on 29 September 2022.</i>					
1.10.2	Progress of Associated Smallholders and Out growers for Certifiable Standard					

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-3	<p>1. Briyogi Shadiwa (Lead Auditor). Indonesian citizens. Associate degree of Oil Palm Plantation, Bogor Agricultural University. He has work experience since 2009 in several private oil palm plantation companies in Indonesia as Assistant Agronomy and Agronomy Quality Control. The trainings that have been attended include: RSPO Lead Auditor Course by Checkmark, ISPO Auditor Training by LPP, Lead Auditor ISO 9001: 2015, RSPO Supply Chain Certification Training Course by Checkmark, Lead Auditor ISO 14001: 2015, SMK3 Awareness, OHSAS 18001 Awareness: 2007, SA 8000 Awareness, ISO 45001: 2018 Awareness and General OHS Expert Training. In this audit, he verified the Legal, worker welfare and SCCS aspect.</p> <p>2. Erika Lucitawati (Auditor). Indonesian citizen. Bachelor of Engineering with major in Environmental Engineering. The trainings that have been attended include ISPO Lead Auditor Training, RSPO Lead Auditor Training, Awareness SA8000, In House Training of ISO 19011: 2018, ISO 17021: 2015, ISO 17065: 2012, ISO 9001: 2015, ISO 14001: 2015, ISO 45001: 2018, and The Supervision of Occupational Health and Safety Training. During this assessment, she verified environmental, GHG, and conservation aspects.</p> <p>3. Firda Tarunajaya (Auditor). Indonesian citizen, Bachelor of Forestry with major in Silviculture, Bogor Agricultural Institute. He has working experienced as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The trainings that have been attended include Lead Auditor RSPO, Lead Auditor ISPO, Quality Management Systems (ISO 9001:2015) by IRCA, Environmental Management Systems (ISO 14001:2015), ISO 19011:2018, ISO 17021:2011 and ISO 17065:2012. During this assessment, he verified BMP and OHS aspect.</p> <p>4. Sabiah Dhiningtyas Utami (Trainee Auditor). Indonesian citizens. Bachelor of Agriculture, Department of Agrotechnology, Padjadjaran University. She has attended ISPO Auditor Training, ISO IRCALAC 9001, Awareness ISO 19011:2018, ISO 14001:2015, ISO 45001:2018, ISO 17021:2015, ISO 17065:2012, RSPO Awareness and participated in several IHT in the fields of employment, environment, BMP, and other aspects. Has participated in several simulations of audit activities related to the certification system for sustainable palm oil plantations with labor and social aspects. In this audit activity, verifying the worker welfare aspect under the supervision of the Lead Auditor.</p> <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-3	<p>Number of auditors : 3 Auditor and 1 auditor trainee</p> <p>Number of days for ASA-3 at site : 5 days</p> <p>Number of working days for ASA-3 at site : 15 Working days</p>
2.2.2	Assessment Process
ASA-3	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Subur Arum Makmur to the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorse by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard Endorsed by the RSPO Board of Governors on 12 November 2020.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>The scope of certification of Subur Arum Makmur POM with FFB supplied by three (1) Estates : Subur Arum Makmur Estate. In this assessment there is an additional scope for Petapahan-1 Estate, and Petapahan-2 Estate.</p> <p>Some opportunities for improvement of the results ASA-3 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA-4.</p>

Improvement of findings from ASA-1 and ASA-2 Onsite findings were observed by auditors at this ASA-3 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-3.

The opening meeting was held on February 13th, 2023, at Meeting Room Office. As for the participants who attended the opening meeting included Sub Head Estate and Mill Sub Head, Support Team from Jakarta and other staff at Estate and POM. Closing meeting was held on February 17th, 2023, which was attended by the same participants as the opening meeting. Management PT Subur Arum Makmur accept all the ASA-3 audit results.

The assessment program please find Appendix 2.

2.2.3	Locations of Assessment
ASA-3	<p>The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>Subur Arum Makmur POM</p> <ul style="list-style-type: none"> • Weighbridge station. Interview with 1 worker related to supply chain aspect and worker welfare • Grading Station. Observations and interviews related work procedure, safety aspect, worker welfare etc. • Loading Ramp Station. Observations and interviews related work procedure, safety aspect, worker welfare etc. • Sterilizer Station. Observations and interviews related work procedure, safety aspect, worker welfare etc. • Engine Room. Observation related work procedure, safety aspect, worker welfare, environment aspect etc. • Boiler Station. Observation and interviews related work procedure, safety aspect, worker welfare etc. • Nut & Kernel Station. Observation and interviews related work procedure, safety aspect, worker welfare etc • Security Post. Observation and interview related to work procedure, emergency response facility, OHS, worker welfare and supply chain aspect. • Workshop. Observation and interview related to work procedure, OHS and workers welfare aspect. • Oil Storage. Observation related to storage condition, MSDS, OHS, emergency response facility and hazardous waste management. • Chemical Material Storage. Observation related to storage condition, MSDS, OHS, emergency response facility and hazardous waste management. • General Storage. Observation related to storage condition, material stock, PPE stock, OHS and emergency response facility. • Hazardous Waste Storage. Observation related to storage condition, hazardous waste stock, OHS, emergency response facility, and waste management. • Water Treatment Plant. Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects. • Empty Bunch, Shell, and Fiber Area. Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects • WWTP. Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects <p>Subur Arum Makmur/Senamanenek Estate</p> <ul style="list-style-type: none"> • HGU Pole No. 57 and No. 58. Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency. • No Burning Sign Block in Housing Area SAM POM. Observations related fire management. • No Child Area Sign Block 28 Division 2, Q29 Division 7. Observations related to warning sign of child protection. • Beneficial Plant Block G30 Division 1. Observation <i>Beneficial Plant</i> Antigonon Leptopus and <i>Turnera Subulata</i> • Harvesting Block L19 L18 Division 3. Observations and interviews related work procedure, safety aspect, worker welfare etc. • Barn Owl Boxes/Gupon Block Q21 Division 8. Observation Gupon <i>Tyto Alba</i>

- **Fertilizer Block G31 Divisi 1.** Observations and interviews related work procedure, safety aspect, worker welfare etc
- **Spraying Block Q20 Q21 Division 8.** Observations and interviews related work procedure, safety aspect, worker welfare etc
- **Loading FFB Block L19 L20 Division 3.** Observations and interviews related work procedure, safety aspect, worker welfare etc
- **Neprolepis Block Q20 Q21 Division 8.** Observation cover crops.
- **Employee Housing Complex Afdeling 1, 7 and 8.** Observation and interview related to waste management, house condition and infrastructure for the welfare of workers and their family.
- **Daycare.** Observation and interview related to daycare condition, public facility, OHS, worker welfare and waste management.
- **Educational Facility (Elementary School).** Observation and interview related to school condition, public facility and waste management.
- **Rinse House.** Observation related to implementation of procedure, OHS and waste management.
- **Landfill Block F30.** Observation related to waste management and environmental aspect.
- **General Storage.** Observation related to storage condition, material stock, PPE stock, OHS and emergency response facility.
- **Agrochemical Storage.** Observation related to storage condition, agrochemical stock, OHS, emergency response facility and hazardous waste management.
- **Fertilizer Storage.** Observation related to storage condition, fertilizer stock, OHS, emergency response facility and hazardous waste management.
- **Oil Storage.** Observation related to storage condition, MSDS, OHS, emergency response facility and hazardous waste management.
- **Fuel Storage.** Observation related to storage condition, OHS and emergency response facility.
- **Firefighting Storage.** Observation related to condition the firefighting facilities and equipment.
- **Workshop.** Observation and interview related to work procedure, OHS and workers welfare aspect.
- **Clinic.** Observation and interview related to clinic condition, treatment mechanisms, OHS, and medical waste management.

Petapahan-1 Estate

- **Employee Housing Complex.** Observation and interview related to waste management, house condition and infrastructure for the welfare of workers and their family.
- **Daycare.** Observation and interview related to daycare condition, public facility, OHS, worker welfare and waste management.
- **Landfill Block J38.** Observation related to waste management and environmental aspect.
- **Harvesting Block A54 – A57 Afdeling 3.** Observations and interview related to technical work procedures, OHS, employment, environmental and social aspects.
- **Fertilizer Block A117 Afdeling 2.** Observation and interview related to technical work procedures, OHS, employment, environmental and social aspects.
- **Spraying Block A22 Afdeling 1.** Observation and interview related to technical work procedures, OHS, employment, environmental and social aspects.
- **Nursery Area Block A31.** Observation and interviews related to technical work procedures, OHS, employment, environmental and social aspects
- **Immature Area Block A105 and A106.**
- **Terrace Area Block A116 and A125.** Observation related to soil conservation management.
- **Barn Owl Boxes/Gupon Block A19.** Observations related to the use of owls as IPM.
- **Fire Tower Block A23.** Observations related to fire emergency response conditions.
- **HGU Pole No. III Block 118 Afdeling II.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HGU Pole No. 131 Block 110 Afdeling II.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.

- **HGU Pole No. II Block 002 Afdeling I.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HGU Pole No. 13 Block 003 Afdeling I.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HCV Area Block 134 Afdeling II.** Observation of aspect of management of HCV area.

Petapahan-2 Estate

- **HGU Pole No. IX & IX A.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **Beneficial Plant Blok 84 85 Divisi 1.** Observation *Beneficial Plant Turnera Subulata & Antigonon Leptopus*
- ***Neprolepis* Block J15 Division 2.** Observation cover crops.
- **Harvesting Block 01 02 Division 3.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **Barn Owl Boxes/Gupon Block 54 Division 2.** Observation Gupon *Tyto Alba*
- **No Burning Sign Block 08 Division 3.** Observations related fire management
- **Fertilizer Block 54 Division 2.** Observations and interviews related work procedure, safety aspect, worker welfare etc
- **Spraying Block 08 Division 3.** Observations and interviews related work procedure, safety aspect, worker welfare etc
- **EFB Application Block I17, J15 Division 2.** Observations and interviews related work procedure, safety aspect, worker welfare etc
- **Housing Area Division 3.** Observation related to company facilities
- **Replanting Blok 38 Afdeling 4.** Observations and interviews related work procedure, safety aspect, worker welfare etc
- **Landfill Area Block 9 Division 3.** Observations related to waste management
- **No Child Area Sign Block 104 Division 1, Block 11 Division 3.** Observations related to socialization of company policies
- **Terrace Area Block 08 Division 3.** Observation related water and soil management
- **Erosion Poles Block 54 Division 2.** Observation related soil management

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-3	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Subur Arum Makmur was held by:</p> <ul style="list-style-type: none"> • Public Notification on Mutuagung website 30 January 2023. • Public consultation meeting with government institution 15 February 2023. • Public consultation meeting with communities including previous land owner 15 February 2023. • Public consultation meeting with internal stakeholders and contractor 15 February 2023. • Public Consultation with NGO (Jikalahari, Perkumpulan Elang, Greenpeace and Sawit Watch) on 8 February 2023. <p>Numbers of input from stakeholders were clarified by PT Subur Arum Makmur.</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit (ASA-4) will be conducted eight (8) months to twelve (12) months after date of annual license.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of PT Subur Arum Makmur consisting of one (1) mill and one (1) oil palm estate and PT Arindo Trisejahtera consisting of two (2) oil palm estates of PT Subur Arum Makmur.

During the assessment, there were two (2) Nonconformities were assigned against Minor raised to Major Compliance Indicator, two (2) Nonconformities were assigned against Major Compliance Indicator; one (1) nonconformity were assigned against Minor Compliance Indicators; and three (3) opportunities for improvement were identified.

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

MUTUAGUNG LESTARI found that Subur Arum Makmur POM – PT Subur Arum Makmur subsidiary of First Resources Ltd complied with the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification System for Principles and Criteria, 12 November 2020.

Therefore, MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is **Continued**.

Ref Std.	VERIFICATION RESULT of MUTU-Certification
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY	
1.1	The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.
1.1.1, 1.1.3, 1.1.4, 1.1.5	<p>Unit of certification unit has a list of documents that can be accessed by stakeholders in accordance with Circular No. FR/SE/01/II/2018 dated January 1, 2018, including legality documents, environmental documents, social documents, continuous improvement, and external sustainability audit reports (ISPO and RSPO). The certification unit also has a Communication SOP no FR.EMS.CIE number published 02 dated November 22, 2018, which contains information flow flows, requests for information from stakeholders, complaints/dissatisfaction, conflicts, suggestions, and consultations with companies. The company's response is no later than 1 month, and the follow-up response is no later than 6 months since the application is received with the PIC of Public Relations/General Manager.</p> <p>Unit of certification shows the 2022-2023 information logbook for PT Subur Arum Makmur and PT Arindo Trisejahtera. Based on that document, there were no incoming letter in kind of request of information. Based on document verification, unit of certification has responded to all incoming mails in a timely manner according to procedures. The results of interviews with stakeholders of the relevant agencies in Kampar Regency, it is known that each agency already knows what information can be accessed, the PIC of corporate communications for both PT Subur Arum Makmur and PT Arindo Trisejahtera and gives a positive appreciation that the unit of certification is quite communicative with the relevant agencies.</p> <p>Unit of certification has an updated list of contacts and detailed stakeholder information, which will be updated in early 2023. The document contains information including agency, name, position, address, and contact number that can be contacted. Stakeholders include government agencies (provincial, district, sub-district, police, and village levels), health services, educational facilities, community leaders, NGO banks, contractors, and suppliers, including previous landowners.</p>

1.1.2

Based on document review, unit of certification has Communication SOP No FR.EMS.CIE number published 02 dated November 22, 2018, which contains information flow flows, requests for information from stakeholders, complaints/dissatisfaction, conflicts, suggestions, and consultations with companies. Unit of certification's response is no later than 1 month, and the follow-up response is no later than 6 months since the application is received with the PIC of Public Relations/General Manager. All public documents are placed in mill and estate office. Besides, public documents are available in appropriate language which is Bahasa and are accessible to relevant stakeholders such as OSH implementation report, environmental management and monitoring report, and plantation activities report. Based on the results of document review and interviews with agencies, such as the Plantation Agency, Environmental Agency, Land Agency and Manpower Agency of Kampar Regency, it is known that the information presented by the certification unit has been presented in an appropriate language and can be accessed by the agency. The unit of certification has provided evidence that the information has been received in an appropriate form and language for the relevant stakeholders, for example it is shown in environmental mandatory reports which has been received by relevant agency below:

PT Arindo Tri Sejahtera

- Receipt of Hazardous and Toxic Waste Management Report PT ATS (Petapahan-1) for Third Quarter of 2022 to Environmental Agency of Kampar Regency on 05 December 2022.
- Receipt of the Hazardous and Toxic Waste Management Report PT ATS (Petapahan-1) for Third Quarter of 2022 to Environment and Forestry Agency of Riau Province and Ministry of Environment and Forestry with electronic receipt No. 1667807337-3349.
- Receipt of Hazardous and Toxic Waste Management Report PT ATS (Petapahan-1) for Fourth Quarter of 2022 to Environmental Agency of Kampar Regency and Environment and Forestry Agency of Riau Province on 10 February 2023.
- Receipt of Hazardous and Toxic Waste Management Report PT ATS (Petapahan-1) for Fourth Quarter of 2022 to Ministry of Environment and Forestry with electronic receipt No. 16762507475-3683.
- Receipt of Hazardous and Toxic Waste Management Report PT ATS (Petapahan-2) for Third Quarter of 2022 to Environmental Agency of Kampar Regency on 05 December 2022.
- Receipt of Hazardous and Toxic Waste Management Report PT ATS (Petapahan-2) for Third Quarter of 2022 to Environment and Forestry Agency of Riau Province and Ministry of Environment and Forestry with electronic receipt No. 1667807580-3350.
- Receipt of Hazardous and Toxic Waste Management Report PT ATS (Petapahan-2) for Fourth Quarter of 2022 to Environmental Agency of Kampar Regency and Environment and Forestry Agency of Riau Province on 10 February 2023.
- Receipt of Hazardous and Toxic Waste Management Report PT ATS (Petapahan-2) for Fourth Quarter of 2022 to Ministry of Environment and Forestry with electronic receipt No. 1675998811-3684.
- Receipt of RKL-RPL Report PT ATS (Petapahan-1) for First Semester of 2022 to Environmental Agency of Kampar Regency and Environment and Forestry Agency of Riau Province on 31 August 2022, as well as Ministry of Environment and Forestry with electronic receipt No. 1676257940-3349.
- Receipt of RKL-RPL Report PT ATS (Petapahan-2) for First Semester of 2022 to Environmental Agency of Kampar Regency and Environment and Forestry Agency of Riau Province on 31 August 2022, as well as Ministry of Environment and Forestry with electronic receipt No. 1676258605-3350.
- Receipt of RKL-RPL Report PT ATS (Petapahan-1) for Second Semester of 2022 to Environmental Agency of Kampar Regency and Environment and Forestry Agency of Riau Province on 10 February 2023, as well as Ministry of Environment and Forestry with electronic receipt No. 1664336479-3349.
- Receipt of RKL-RPL Report PT ATS (Petapahan-2) for Second Semester of 2022 to Environmental Agency of Kampar Regency and Environment and Forestry Agency of Riau Province on 10 February 2023, as well as Ministry of Environment and Forestry with electronic receipt No. 1667359259-3350.

PT Subur Arum Makmur

- Receipt of Hazardous and Toxic Waste Management Report PT SAM for Third Quarter of 2022 to Environmental Agency of Kampar Regency and Environment and Forestry Agency of Riau Province on 05 December 2022.
- Receipt of Hazardous and Toxic Waste Management Report PT SAM for Third Quarter of 2022 to Ministry of Environment and Forestry with electronic receipt No. 1676013547-3600.
- Receipt of Hazardous and Toxic Waste Management Report PT SAM for Fourth Quarter of 2022 to Environmental Agency of Kampar Regency and Environment and Forestry Agency of Riau Province on 05 December 2022.
- Receipt of Hazardous and Toxic Waste Management Report PT SAM for Fourth Quarter of 2022 to Ministry of Environment and Forestry with electronic receipt No. 1676013561-3600.
- Receipt of POME Management and Monitoring Report for Third Quarter of 2022 to Environmental Agency of Kampar Regency and Environmental Agency of Riau Province on 05 December 2022.

- Receipt of POME Management and Monitoring Report for Fourth Quarter of 2022 to Environmental Agency of Kampar Regency and Environmental Agency of Riau Province on 10 January 2023.
- Receipt of RKL-RPL Report PT SAM for First Semester of 2022 to Environmental Agency of Kampar Regency and Environment and Forestry Agency of Riau Province on 31 August 2022, as well as Ministry of Environment and Forestry with electronic receipt No. 1676258914-1675.
- Receipt of RKL-RPL Report PT SAM for Second Semester of 2022 to Environmental Agency of Kampar Regency and Environment and Forestry Agency of Riau Province on 10 February 2023, as well as Ministry of Environment and Forestry with electronic receipt No. 1659067150-1675.

Status: Comply

1.2
The unit of certification commits to ethical conduct in all business operations and business transactions.
1.2.1

Based on the results of interviews with management representatives, information was obtained that there were no changes regarding the ethical policies implemented in all operations and business transactions of the company from the previous audit. The unit certification showed commitment to ethical behaviour is contained in the Circular Letter Number PH/SE/II/2018 February 2018 which has been approved by the Plantation Managers Group and Zero Fraud Tolerance Policy Number FR.CIA.ZFT.001 dated December 28th, 2012, which is still valid. These two documents explain related to the company's 15 ethical code policies and systems that monitor compliance with the implementation of ethical business practices.

Socialization regarding this policy has been carried out in every estate and factory unit, for example socialization at the Senamanenek Estate (PT SAM) on December 5th, 2022, and at the Petapahan 2 Estate (PT ATS) on December 13th, 2022. This socialization has also been carried out to all workers during the morning briefing before starting work.

Socialization regarding ethical policies has also been carried out routinely to external stakeholders at least once a year or at the signing of a work contract. After signing the work contract, representatives of external stakeholders will sign a commitment letter regarding sustainability and 20 fulfilment of RSPO certification requirements. In point 5 concerning Legal Compliance and Human Rights the commitment letter states that "The 2nd party (contractor/supplier) in carrying out its business operations continues to apply ethical behavior and uphold and respect human rights".

Based on interviews with plantation and mill employees, representatives of internal and external stakeholders, it is known that the policy has been understood and implemented in all business operations and transactions, including recruitment and contracts. They also understand the values, work ethics, and basic code of conduct in carrying out their daily activities.

1.2.2

The unit of certification has a mechanism to monitor compliance and the implementation of ethical business policies and practices through compliance inspection and evaluation. For example, conducting regular internal audits to ensure operational units comply with policies and SOPs. The scope of the internal audit is the compliance of each unit in plantations and mills with all aspects contained in the RSPO P&C such as aspects of labour, environment, BMP and other aspects. The last internal audit was carried out on November 7th – 11th, 2022.

In addition, there is a Whistle Blowing System that determines the flow of complaints/reports of violations to all employees and stakeholders, without any worries, willing to convey the possibility of fraudulent practices occurring within the certification unit. This is done to ensure that all parties can report violations if the unit of certification commits violations during cooperation. This is in line with the results of field visits that around company areas such as offices or other buildings have installed complaint sms numbers and designated staff emails to accommodate complaints from parties.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS
2.1
There is compliance with all applicable local, national and ratified international laws and regulations.

2.1.1

Unit of certification has complied with all relevant laws and regulations which has been shown by the following documents:

Legality Aspect

- The company already has land rights in the form of HGU and HGB according to laws and regulations.
- Have a plantation business license in accordance with statutory regulations.
- The company has developed a plasma plantation which is managed directly according to the obligations stated in the business license it has.

BMP Aspects:

- LPUP PT. Arindo Trisejahtera, 1st Semester of 2022 No. 02.04/X/051/VII/2022, July 5th, 2022 to Plantation Agency of Riau Province
- LPUP PT. Arindo Trisejahtera, 2nd Semester of 2022 No. 02.04/X/004/II/2023 February 1st, 2023 to Plantation Agency of Riau Province
- LPUP PT. Subur Arum Makmur, 1st Semester of 2022 No. 02.04/X/061/VII/2022 July 5th, 2022 to Plantation Agency of Riau Province
- LPUP PT. Subur Arum Makmur, 2nd Semester of 2022 No. 02.04/X/004/II/2023 February 1st, 2023 to Plantation Agency of Riau Province
- The company does not use fire in managing its land, including in land clearing and controlling plant pests and diseases

OHS Aspect

- Committee OHS 1st Quarterly Report PT. SAM on April 4th 2022 to Manpower Agency of Riau Province
- Committee OHS 2nd Quarterly Report PT. SAM on 03 July 03rd 2022 to Manpower Agency of Riau Province
- Committee OHS 3rd Quarterly Report PT. SAM on October 3rd, 2022 to Manpower Agency of Riau Province
- Committee OHS 4th Quarterly Report PT. SAM on January 3rd, 2022 to Manpower Agency of Riau Province
- Committee OHS 1st Quarterly Report PT. ATS on April 04th, 2022 to Manpower Agency of Riau Province
- Committee OHS 2nd Quarterly Report PT. ATS on July 03rd, 2022 to Manpower Agency of Riau Province
- Committee OHS 3rd Quarterly Report PT. ATS on October 3rd, 2022 to Manpower Agency of Riau Province
- Committee OHS 4th Quarterly Report PT. ATS on January 3rd, 2022 to Manpower Agency of Riau Province
- The company has provided free PPE to all employees
- The company has covered K3 employees, including through health assurance and employment assurance

Worker Welfare Aspect

- Employment Report (*WLTk*) of Petapahan 1 estate PT ATS with register number 28464.20220519.0001, reporting date on May 19th, 2022, obligation to report back on May 19th, 2023.
- Employment Report (*WLTk*) of Petapahan 2 estate PT ATS with register number 28464.20220519.0004, reporting date on May 19th, 2022, obligation to report back on May 19th, 2023.
- Employment Report (*WLTk*) of Senamanenek 1 estate PT SAM with register number 28464.20220520.0002, reporting date on May 20th, 2022, obligation to report back on May 20th, 2023.
- Employment Report (*WLTk*) of Subur Arum Makmur mill PT SAM with register number 28556.20220520.0001, reporting date on May 20th, 2022, obligation to report back on May 20th, 2023.
- The company has complied with the implementation of minimum wages for all employees in accordance with applicable regional regulations (Riau Governor's Decree on District/City Minimum Wages in Kampar Regency, Riau Province year of 2022 and 2023).
- All employees have been registered in *BPJS Ketenagakerjaan* and *BPJS Kesehatan* social security.

Environmental Aspect

- PT Subur Arum Makmur's Environmental Impact Analysis (ANDAL) document in Tapung Hulu District, Kampar Regency, Riau Province for operational activities of oil palm plantations and mills (change in mill production capacity from 45 tonnes/hour to 90 tonnes/hour). This document was approved by the Head of the Environment Agency for Kampar Regency with Decree No. Kpts/BLH-DAL/KLH /2011/46 on June 13, 2011 which was established in Kampar Regency. Document of Environmental Management and Monitoring Plan (*RKL-RPL*) which was approved by the Head of the Environment Agency for Kampar Regency with Decree No. Kpts/BLH-DAL/KLH/2011/46 on June 13, 2011 which was established in Bangkinang, Kampar Regency.

- *Dokumen Pengelolaan dan Pemantauan Lingkungan (DPPL)* in 2009 has been covered area of 634.846 Ha. The DPPL has been approved based on Decree of Kampar Regent Number: 660/BLHI/355/2009 concerning Approval of *Penetapan Dokumen Pengelolaan dan Pemantauan Lingkungan (DPPL) Kegiatan Perkebunan Kelapa Sawit seluas 634,846 Ha di Desa Senama Nenek Kecamatan Tapung Hulu Kabupaten Kampar a.n. PT Arindo Trisejahtera* on 28 December 2009.
- *Penyajian Informasi Lingkungan Perkebunan dan Pabrik Pengolahan Kelapa Sawit PT Arindo Trisejahtera* in 1993 has been covered area of 3,471.4 Ha in Petapahan-1 and 4,270.0 Ha in Petapahan-2. This document has been approved based on Decree of Ministry of Agriculture Number: 003/PIL/RKL-RPL/BAVII/94 concerning approval of *Persetujuan PIL dan RKL/RPL PT Arindo Trisejahtera* on 25 July 1994.
- PT Subur Arum Makmur has Recommendation of Fulfilment of Management Permit Commitment for Temporary Storage of Hazardous Waste of PT Subur Arum Makmur number 660/DLH-PPKL/REK-LB3/2020/10 dated 21 April 2020 valid 5 years. PT Subur Arum Makmur has also Permit of Operational Management of Hazardous and Toxic Waste for Producers issued by OSS Institution on 4 May 2020. Types of waste stored used oil, used batteries, used oil filters, used filters, used rags and the like, used light bulbs, used chemical jerry cans, used chemical containers, used fertilizer sacks and used chemical sacks, used cartridges, waste medical, and resin waste. Temporary storage of hazardous and toxic waste locations at 00°49'05.2" S and 100°53'17.4" E.
- PT Arindo Trisejahtera Petapahan-1 Estate has Recommendation of Fulfilment of Management Permit Commitment for Temporary Storage of Hazardous Waste of PT Arindo Trisejahtera Petapahan-1 Estate number 660/DLH-PPKL/REK-LB3/2020/11 dated 21 April 2020 valid 5 years. PT Arindo Trisejahtera Petapahan-1 Estate has also Permit of Operational Management of Hazardous and Toxic Waste for Producers issued by OSS Institution on 4 May 2020. Types of waste stored used oil, used batteries, used oil filters, used filters, used rags and the like, used light bulbs, used chemical jerry cans, used chemical containers, used fertilizer sacks and used chemical sacks, used cartridges, waste medical, and resin waste. Temporary storage of hazardous and toxic waste locations at 00°34'46,6" S and 100°55'29,0" E.
- Unit of certification already has a Land Application Permit based on Decree of Ketapang Regent No 503/DPM-PTSP.PEL/LA/2018/01 regarding permit for use of palm oil industrial wastewater on the oil palm plantation land of PT Subur Arum Makmur which was approved by Head of Investment and One Stop Integrated Services Office of Kampar Regency on 15 February 2018 and valid for five years. The application area of 325 ha is in 12 blocks (H24 to H32 and Blok G24 to G26) with a total area of 291.71 Ha.

2.1.2

The certification unit has SOP *Identifikasi dan Evaluasi Peraturan Perundangan Serta Persyaratan K3 Lainnya* (FR.OSH.P04, Date 1 September 2011). The document describes the company's mechanism for ensuring that all legal regulations both local, national and international that have been ratified and related to plantation activities have been complied with. This procedure also ensures that not only the company unit, but also all contractors, suppliers and stakeholders who have a relationship with the company either operationally or are affected. This responsibility is held by the Corporate Sustainability. Law register audits are conducted every 6 months or at certain times deemed necessary. The last audit conducted on 12 December 2022, which already update latest regulation such as SK Gubernur Riau No. 1359 Tahun 2022 Tentang Upah Minimum Kabupaten Tahun 2023 Rp 3,085,615.

Regarding legal compliance for third parties, the company also demonstrates the implementation of compliance with labor regulations by contractors, for example:

- Pay slip for contractor worker PT Tresco Cahaya Abadi with the initials HS who received a basic wage in January 2023 of IDR 3,350,000.
- Pay slip for contractor workers PT Pagar Negeri with the initials JR who received a basic wage in January 2023 of IDR 3,300,258.

2.1.3

The company has a map that showing the location of the boundary poles in each estate. The company has also monitored HGU boundary pole in December 2022 by showing the results of monitoring record "*Laporan Pemeriksaan Pal Batas HGU*", in accordance with the maintenance procedures (WI.PPH.01, 6 August 2022). The procedures include stating that General Division Regional Team ensure and coordinates with the head unit so that the position and number of the stake are in accordance with the Land Use Title / and Building Right map. In addition, it is also stated that the stakes care is carried out at least once a year. The results of field observations on the boundary pole for example No. 57 & 58 (Subur Arum Makmur Estate), No. IX & IX A (Petapahan-2 Estate) and No. III, 131, II & 13 (Petapahan-1 Estate) are found and that the condition of the boundary poles is well maintained and there is no indication of planting outside the HGU boundaries.

Status: Comply

2.2

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

2.2.1

The unit of certification maintains a list of contractors stating the contractor's name, address, telephone number, job description and others. The list of contractors corresponds to the information in the list of stakeholders and all third parties have been registered, such as hazardous toxic and waste contractors, security service provider, supplier, etc. The unit of certification has shown a list of contractors for the 2023 period, for instance:

- PT Pagar Negeri, Cooperation in the security service provider.
- PT Rajawali Perkasa Jaya, Cooperation in the security service provider.
- PT Tresco Cahaya Abadi, Cooperation in replanting contractor.
- PT Shali Riau Lestari, Cooperation in the transportation of hazardous toxic and waste.
- PT Bumi Sawit Perkasa as a FFB supplier.
- KKPA Bumi Sawit Perkasa as a FFB supplier.
- PT Arindo Trisejahtera as a FFB supplier.
- CV Teman Setia, Cooperation in the transportation of CPO.

The unit of certification also shows work agreement documents with third parties. As an example:

- Work agreement letter number 04/ *Tenaga Sat Pengaman*/SAM/LGL-PKU/VI/22 between PT Pagar Negeri and PT SAM for the work of security service provider. The work agreement is valid from July 1st, 2022, to December 31st, 2022.
- Work agreement letter number S4/P- *Limbah B3*/SAM/LGL-PKU/IV/22 between the certification unit and PT Shali Riau Lestari for the work of hazardous toxic and waste transporter. The work agreement is valid from April 2nd, 2022, to April 1st, 2023.

2.2.2

The unit of certification shows the work agreement document with the contractor. In the cooperation contract it is explained that there is an article which stipulates that the contractor is obliged to follow the labor laws in force in Indonesia. For example, the security service provider work agreement document between the certification unit and PT Rajawali Perkasa Jaya number 30/ *Tenaga Sat Pengaman*/ATS/LGL-PKU/IV/22 dated April 1st, 2022. The document explains that the second party must comply with applicable labor regulations, such as wages for contractor workers, prohibition of the use of underage workers, provision of work facilities, work accident insurance and worker health, etc.

The unit of certification also demonstrates the implementation of compliance with labor regulations by contractors, for example:

- Pay slip for contractor worker PT Tresco Cahaya Abadi with the initials HS who received a basic wage in January 2023 of IDR 3,350,000.
- Pay slip for contractor workers PT Pagar Negeri with the initials JR who received a basic wage in January 2023 of IDR 3,300,258.
- Proof of payment for *BPJS Ketenagakerjaan* and *BPJS Kesehatan* for contractor workers (PT Pagar Negeri, PT Rajawali Perkasa Jaya and PT Tresco Cahaya Abadi) period of December 2022 and January 2023.

Based on the results of interviews with local contractors, information was obtained that once a year the unit of certification has conducted outreach regarding OHS, compliance with labor regulations, environmental management, etc, to contractors and contractor workers. The unit of certification also conducts work evaluations of contractors as a form of compliance with the policies that apply in the company's operational areas and the laws and regulations that apply in Indonesia.

Based on the description above, the unit of certification has its own clause regarding the 23 fulfilment of relevant legal obligations and can be proven by the third party concerned.

2.2.3

Based on the results of a review of the contractor/supplier work agreement document, for example the security service provider work agreement letter number 30/ *Tenaga Sat Pengaman*/ATS/LGL-PKU/IV/22, it is explained that the contractor is required to provide PPE for its workers, guarantee and include all workers in the BPJS program *BPJS Ketenagakerjaan* and *BPJS Kesehatan*, do not employ children under the age of 18, do not practice forced labor and illegal labor. Then based on interviews with the contractor, information was obtained that the contractor representative could explain related to several prohibitions in accordance with labor laws such as the prohibition on the use of underage labor, forced labor and human trafficking.

As a form of compliance with the implementation of the clauses contained in the work agreement, the certification unit evaluates the contractor's performance as outlined in the Contractor Evaluation Form. The criteria assessed in the evaluation are the availability of operational access, product quality, vehicle condition and driving rules, compliance with employment (wages, age, BPJS and workers' insurance) and fulfilment of HSE requirements (PPE and OHS rules in the company). For example, the work evaluation document for contractor PT Pagar Negeri with work agreement letter number 14/EVL-KTR/SAM1/XII/2022 for the assessment period in July – December 2022, received a good score so that the unit of certification recommended continuing work again in the next period.

From the explanation above, it can be concluded that all contracts have their own clauses that prohibit practices involving child labor, forced labor, and workers from human trafficking.

Status: Comply

2.3

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

2.3.1

The unit of certification has informed all FFB received by the factory both certified and non-certified. Based on a review of weighing card documents and production records, there are no third-party suppliers or independent smallholders. The uncertified FFB suppliers are PT Bumi Sawit Perkasa and its KKPA which are still under the management of First Resources.

2.3.2

From the recorded data on FFB receipts for the 2022/2023 period, it is known that the company not received FFB from collectors. All supplier is subsidiary of First Resources group.

Status: Comply

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

3.1

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

3.1.1

The company shows a time-framed planning, namely short term, medium term and long-term plans to produce sustainable palm oil from 2019 to 2023:

DESCRIPTION	2019 (Tons)	2020 (Tons)	2021 (Tons)	2022 (Tons)	2023 (Tons)
PT. SAM:					
- FFB	265,628	292,191	321,410	353,551	388,906
- OER	22.75	22.75	22.75	22.75	22.75
- KER	5.70	5.70	5.70	5.70	5.70
- CPO	79,004	86,905	95,595	105,155	115,670
- Kernels	19,795	21,774	23,951	26,346	28,981
PT. ATS:					
- TBS	303,784	334,162	367,578	404,336	444,770
- CPO	27,486	30,235	-	-	-
- Kernels	7,902	8,692	-	-	-

In 2021-2023 PT. ATS does not have projections for CPO and Kernel production because the plantation area of PT. ATS has been replanting since 2021 until now and it is planned that PT. ATS will resume operations in July 2023. The FFB which is still produced from PT. ATS is sent to PT. SAM and the employee in PT. ATS was transferred to another company that is part of PT. FR Group.

The unit of certification has also carried out a financial audit as outlined in the report on financial audit results for the period 31 December 2021 Number 01382/2.1032/AU.1/01/0240-1/1/VI/2022 on June 03rd, 2022 which was carried out by the Accountant Office Public with opinion The attached financial statements present fairly, in all material respects, the financial position of PT. Subur Arum Makmur dated

December 31st, 2021 and the financial performance and cash flows for the year then ended, in accordance with Indonesian financial accounting standards.

In addition, there is a financial audit report for the period December 31st, 2021 Number 01381/2.1032/AU.1/01/0240-1/1/VI/2022 on June 03rd, 2022 conducted by a Public Accounting Firm with an opinion The attached financial statements present fairly, in all material respects, the financial position of PT. Arindo Trisejahtera as of December 31st, 2021, as well as financial performance and cash flows for the year then ended, in accordance with Indonesian financial accounting standards

Based on the description above, it shows that the company has time-framed planning and business feasibility in carrying out its business processes

3.1.2

The company has a replanting plan for the 2020-2023 period, namely:

UNITS		REPLANTING			
ESTATES	Year of Planting	2020	2021	2022	2023
ATS2	1993	249.70			97.55
ATS2	1994	35.60	202.40		188.50
ATS2	1995	100.00	192.50	225.00	
ATS2	1997	233.23	278.53	723.37	529.34
TOTAL		618.53	673.43	948.37	815.39

The company regularly reviews replanting activities, including:

- ATS-1 Estate, the replanting program has been completed in 2021.
- ATS-2 Estate, there are still productive plants with yield above 20 tons/ha/year in planned blocks replanting is carried out. Fertilization is still done regularly normal according to research recommendations and a review will be carried out for future replanting activities done in 2023.
- SAM Estate, there is no plan for replanting activities because FFB production is still classified as high, namely above 20 tonnes/ha/year in 2022 and projected in the next few years still has not decreased. Fertilization is also still carried out normally according to research recommendations.

3.1.3

The certification unit has procedures related to management review, including those found in the Corporate Sustainability Management Procedure No. FR.CSM.IAS concerning Internal Audit which was approved by the CEO on 1 September 2018. This procedure describes how the Audit is carried out and the effectiveness of the Quality Management System (QMS), Environmental Management System, Food Safety Management System, ISCC, RSPO and Sustainable *Palm Oil (SPO)*, through systematic Audit and reporting. The aim is to achieve a balanced assessment of the management system according to areas of success and highlight non-compliance with procedures and other requirements.

The unit of certification conducts periodic management reviews, both at the Estate and at POM, including an annual management review to evaluate operations in 2022, including:

- Follow up improvements from the RSPO Internal Audit Team in February 2022, ISCC and RSPO audits will be carried out in mid-2022 and end of 2022
- Maintaining OER quality by processing FFB to POM on the same day and avoiding *restan* FFB. In general, there has been a significant increase compared to the previous year
- The operational process is always guided by existing SOPs and applicable K3 standards. Quality standard management is used to maintain product standards produced by processes in accordance with existing procedures.
- Improvement of the main road by stockpiling stone to facilitate the transportation of FFB.
- The achievement of DT output per day is still below the standard, namely 35 tons/day, it is necessary to carry out an analysis related to the decline in production output. Minimizing *restan* FFB in the field to reduce the level of acidity (FFA) in POM.
- The unit of certification has also carried out a financial audit as outlined in the financial audit report for the period 31 December 2021 Number 01382/2.1032/AU.1/01/0240-1/1/VI/2022 dated 03 June 2022 which was carried out by the Public Accounting Firm with opinion The attached financial statements present fairly, in all material respects, the financial position of PT. Subur Arum

Makmur dated December 31, 2021, and the financial performance and cash flows for the year then ended, in accordance with Indonesian financial accounting standards.

- In addition, there is a financial audit report for the period 31 December 2021 Number 01381/2.1032/AU.1/01/0240-1/1/VI/2022 dated 03 June 2022 which was conducted by the Public Accounting Firm with an opinion. Fairly, in all material respects, the financial position of PT. Arindo Trisejahtera as of December 31, 2021, as well as financial performance and cash flows for the year then ended, in accordance with Indonesian financial accounting standards.

Based on the description above, it shows that the Unit of Certification has carried out a management review within the planned time.

Status: Comply

3.2

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

3.2.1

The unit of certification 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 to continuous improvement includes:

- The company no longer uses pesticides with the active ingredient paraquat since 1 January 2019.
- The company has implemented biological pest control in this case by using host plants and owls to reduce the use of pesticides, especially insecticides and rodenticides.
- Management and monitoring of fires in the company's border areas that benefit the community.
- Waste management and monitoring through WWTP management, effluent quality testing and reporting to the Environment Agency.
- Management and monitoring of air quality through several actions such as road maintenance, air quality testing, routine vehicle and engine maintenance and vehicle upgrades.
- Management and monitoring of surface water and ground water through testing of quality standards.
- Greenhouse Gas Management and use of land clearing with a mechanical policy and no burning.
- Drilled wells to meet the needs of clean water provided for employee housing
- Special medical check-ups and periodic health checks that are carried out every year.
- There is the application of finger print technology for attendance.

Based on the description above, it shows that the unit of certification already has evidence of the implementation of an action plan for continuous improvement by taking into account social and environmental impacts and opportunities

3.2.2

The company has shown the auditor regarding the RSPO metric template Version 2.1 with 2021 period that has been filled in according to the facts and data in the company's record documents, such as the number of workers, the area of production to the record of work accidents. Based on team auditor's review, the information has been matched with others document, such as supply chain record, demographic workers, etc.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The unit of certification has operational procedures consisting of:

- Corporate sustainability management No. FR.CSM.COR concerning Control of Records was ratified by the CEO on 2 September 2013. The purpose of this procedure describes how to identify, maintain and control records of quality management systems, ISCC environment, food safety, K3 and or records of the implementation of sustainable palm oil management/ *Sustainable Palm Oil* (SPO)
- Operational practices No. FR.CSM.OP.2 concerning Safe Use of *Pesticides* which was approved by the CEO on September 1, 2011. This procedure aims to carry out safe and proper operational performance regarding the use of pesticides according to the instructions for use.
- Policies and procedures for managing marginal lands No. MN.FR.COP.OPA.PLM issued on 1 July 2012, revised and approved

by the CEO on 18 June 2021. The purpose of this procedure is to apply standardization of work on marginal land management that applies within the First Resources Group.

In addition, the certification unit has other operational procedures approved by the CEO, namely:

SOP	SOP number	Date of issue	Revision Date	Revision
Nursery	FR. COP. OPA. PBT	01-Jul-12	-	0
Land Preparation	FR. COP. OPA. PLH	01-Jul-12	24-Jun-13	1
Cultivating LCC	FR. COP. OPA. PKC	01-Jul-12	-	0
Oil Palm Planting	FR. COP. OPA. PKS	01-Jul-12	-	0
Weeding Control	FR. COP. OPA. PGL	01-Jul-12	-	0
Fertilization	FR. COP. OPA. PMK	01-Jul-12	-	0
Pest and Disease Control	FR. COP. OPA. PHT	01-Jul-12	-	0
Castration and Principal Budding (Canopy management)	FR. COP. OPA. KTP	01-Jul-12	-	0
FFB Census and Production	FR. COP. OPA. SPP	01-Jul-12	-	0
Harvesting	FR. COP. OPA. PNN	01-Jul-12	-	0
Pesticide Management	FR. COP. OPA. PPS	01-Jul-12	-	0
Marginal Land Management	FR. COP. OPA. PLM	01-Jul-12	18-Jun-21	1
Replanting	FR. COP. OPA. PRM	01-Jul-12	-	0
Sortation	MN.FR.COP.OPM.PNB	31-Dec-15	-	0
Sterilizer	MN.FR.COP.OPM.PRB	31-Dec-15	-	0
Tippler	MN.FR.COP.OPM.PMB	31-Dec-15	-	0
Digester and Pressing	MN.FR.COP.OPM.PNP	31-Dec-15	-	0
Purification	MN.FR.COP.OPM.PMR	31-Dec-15	-	0
Nut and Fiber	MN.FR.COP.OPM.NTS	31-Dec-15	-	0
Palm Kernel Processing	MN.FR.COP.OPM.PIS	31-Dec-15	-	0
Boilers	MN.FR.COP.OPM.BLR	31-Dec-15	-	0
Electricity	MN.FR.COP.OPM.LST	31-Dec-15	-	0
Water Treatment	MN.FR.COP.OPM.POA	31-Dec-15	-	0
Laboratory	MN.FR.COP.OPM.LAB	31-Dec-15	-	0
Waste treatment	MN.FR.COP.OPM.PLL	31-Dec-15	-	0
Stockpiling and Delivery of CPO and Kernel	MN.FR.COP.OPM.PPK	31-Dec-15	-	0
Maintenance	MN.FR.COP.OPM.PWT	31-Dec-15	-	0

Based on the description above, it shows that the certification unit already has Standard Operating Procedures (SOP).

3.3.2

The CH has a mechanism to check the implementation of procedures consistently, including through the internal audit process, for example the internal audit results report No. 02.01.1/LHA-OPR/21/XII/20222 which was carried out on November 7 – 11, 2022 which evaluates production and plants, estate cost and POM, as well as estate warehouses and POM.

In addition, there are external audit results which are carried out every year as outlined in the financial audit results report for the period 31 December 2021 Number 01382/2.1032/AU.1/01/0240-1/1/VI/2022 dated 03 June 2022 conducted by Public Accounting Firm with opinion The attached financial statements present fairly, in all material respects, the financial position of PT. Subur Arum Makmur dated December 31, 2021, and the financial performance and cash flows for the year then ended, in accordance with Indonesian financial accounting standards.

Based on the description above, it shows that the company already has a mechanism to check the implementation of procedures consistently.

3.3.3

The CH already has records of monitoring and follow-up, for example listed in the Audit Report (Operational Estates and PKS) No. 02.01.1/LHA-OPR/2 1 /X II /202 22 for audit activities conducted 0 7 – 11 November 202 2 . The scope of reports and inspections includes local contractor, Area Statement, Production and plants, estate treasury and POM, plantation and POM warehouses, engineering, personnel, estate administration, security, palm oil mills, plantation and POM management reports, audit findings.

For example, there is a harvester output of 2,232 Kg/workday far compared to the 2022 budget of 3,001 Kg/ workday and experiencing a decrease of 693 Kg/ workday (23.68%) compared to the same period in 2021 2,925 Kg/ workday. Therefore, all assistants, assistants and Plantation Managers or GM must routinely evaluate the achievement of harvesters' output which is still below the budget and determine the needs of harvesters every day must be based on the results of correct harvest figure calculations.

In addition, there is an evaluation of CPO yields from 7-9 November 2022 below the 21% budget, namely only 20.09% to 20.35%. This is because the percentage of grading of unripe fruit is 12% and loose fruit <10%. The unit of certification will evaluate and ensure that the machine units in the mill are in good condition and improve the quality of FFB.

Based on the description above, it shows that the company already has monitoring records and their follow-ups.

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

Unit of certification already has several documents related to social and environmental impact studies carried out independently or participative by involving affected stakeholders in collaboration with accredited independent experts. Some of the records held by unit of certification are as follows:

Environmental Impact Assessment

- PT Subur Arum Makmur's Environmental Impact Analysis (ANDAL) document in Tapung Hulu District, Kampar Regency, Riau Province for operational activities of oil palm plantations and mills (change in mill production capacity from 45 tonnes/hour to 90 tonnes/hour). This document was approved by the Head of the Environment Agency for Kampar Regency with Decree No. Kpts/BLH-DAL/KLH /2011/46 on June 13, 2011, which was established in Kampar Regency. Document of Environmental Management and Monitoring Plan (RKL-RPL) which was approved by the Head of the Environment Agency for Kampar Regency with Decree No. Kpts/BLH-DAL/KLH/2011/46 on June 13, 2011, which was established in Bangkinang, Kampar Regency.
- *Dokumen Pengelolaan dan Pemantauan Lingkungan* (DPPL) in 2009 has been covered area of 634,846 Ha. The DPPL has been approved based on Decree of Kampar Regent Number: 660/BLHI/355/2009 concerning Approval of *Penetapan Dokumen Pengelolaan dan Pemantauan Lingkungan* (DPPL) *Kegiatan Perkebunan Kelapa Sawit seluas 634,846 Ha di Desa Senama Nenek Kecamatan Tapung Hulu Kabupaten Kampar a.n. PT Arindo Trisejahtera* on 28 December 2009.
- *Penyajian Informasi Lingkungan Perkebunan dan Pabrik Pengolahan Kelapa Sawit PT Arindo Trisejahtera* in 1993 has been covered area of 3,471.4 Ha in Petapahan-1 and 4,270.0 Ha in Petapahan-2. This document has been approved based on Decree of Ministry of Agriculture Number: 003/PIL/RKL-RPL/BA/II/94 concerning approval of *Persetujuan PIL dan RKL/RPL PT Arindo Trisejahtera* on 25 July 1994.

Social Impact Assessment

- Social Impact Assessment of PT Subur Arum Makmur in 2013 prepared by Sustainability Department of First Resource. The assessment was carried out based on the results of focus group discussion which involved the surrounding community, namely representatives from Senamanenek Village and Danau Lancang Village along with employee representatives at PT Subur Arum Makmur on 2-15 September 2013.
- Social Impact Assessment of PT Arindo Trisejahtera in 2014 prepared by Sustainability Department of First Resource. The assessment was carried out based on the results of focus group discussion which involved the surrounding community, namely representatives from Rimba Beringin Village, Suka Ramai Village, Kusau Makmur Village, and Summersari Village along with employee representatives at PT Arindo Trisejahtera on 15-17 December 2014.

HCV Assessment

- Identification and Analysis of Existence of High Conservation Values of PT Suber Arum Makmur in April 2010. The study was

conducted by Environment & Conservation Specialist First Resources using reference to 2008 HCV toolkit, with field data collection dates on 13-15 March 2011. Based on the results of identification, area of 70.45 Ha of HCV was obtained.

- Identification and Analysis of Existence of High Conservation Values of PT Arindo Trisejahtera in 2007. The study was conducted by Environment & Conservation Specialist First Resources using reference to 2008 HCV toolkit, with field data collection dates on 16-17 March 2011. Based on the results of identification, each HCV areas have been mapped, and covered areas with following details respectively, HCV 1.2/4.1 covered 9.33 ha on Petapahan-1 Estate, HCV 4.1 on Petapahan-2 Estate covered 16.27 ha, and HCV 6 on Petapahan-2 Estate covered 1.0 ha.

In the documents above, there is information related to environmental aspects and parameters that must be monitored and managed along with information on targets and implementation times contained in the management and monitoring (*RKL-RPL*) matrix. The document has also covered all aspects of plantation and mill activities and their changes throughout the operational activities. The sampling methodology used is also participatory involving external stakeholder groups for the purpose of identifying impacts. Based on the verification of these documents, it can be concluded that all environmental impacts from plantation activities have been identified and their management recommended with reference to relevant laws and regulations.

Meanwhile, types of data collected in social impact assessment are primary data and secondary data. Primary data collection for monitoring the management of social impacts is obtained from relevant stakeholders as affected parties as well as local village officials who represent the community and as verifiers. Secondary data or indirect data collection is carried out by means of literature studies through various references such as environmental assessment documents, HCV assessment documents, local government literature, CSR implementation records, company internal data, correspondence between companies and affected parties, local news, national news, and so on. All these data sources are used as consideration for social impact management recommendations. Based on the verification of these documents, it can be concluded that all social impacts of plantation activities have been identified and their management recommended with reference to relevant laws and regulations.

3.4.2

Unit of certification has managed and monitored social and environmental impacts that are carried out independently by involving affected stakeholders. Some evidence of documentation of activities that have been carried out are as follows:

Environmental Impact Assessment (EIA)

Implementation of environmental monitoring and management plan are documented on periodical report of environmental monitoring and management implementation report for PT Sumber Arum Makmur and PT Arindo Trisejahtera. Unit of certification is consistently done the environmental management and monitoring as outlined in Report of Environmental Management and Monitoring per semester regularly. This is one of effort of the company to develop its management and monitoring plan by participatory manner with affected party. This report described the realization of monitoring and management of the environment in accordance with environmental parameters in monitoring and management implementation report based on document verification Second Semester 2022.

Unit of certification established an HCV management plan to maintain the HCV areas in operation are listed on Management plan HCV 2022 documents. HCV management and monitoring implemented that taken by the management unit such as regular patrol monitoring, socialization of HCV, biodiversity monitoring, etc. Further explanation of HCV management and monitoring plan is contained in 7.12.4.

Besides, unit of certification has also evidence of implementing environmental impact management and monitoring plan, reviewed, and updated in a participatory manner with affected stakeholders. Based on result of interview with representatives of Suka Ramai Village and Danau Lancang Village, it is known that unit of certification has routinely carried out social identification/study in their village carried out by the CSR Team, where the results will be used as a reference for making social and environmental management and monitoring programs whose target is the welfare of the surrounding community. The assistance provided has covered all levels of society and all impacts also has been covered in program established by unit of certification.

Social Impact Assessment (SIA)

Social monitoring and management plan has been included in social impact assessments are shown in documents as follows.

- Social Impact Assessment of PT Subur Arum Makmur in 2013 prepared by Sustainability Department of First Resource. The assessment was carried out based on the results of focus group discussion which involved the surrounding community, namely representatives from Senamanenek Village and Danau Lancang Village along with employee representatives at PT Subur Arum Makmur on 2-15 September 2013.
- Social Impact Assessment of PT Arindo Trisejahtera in 2014 prepared by Sustainability Department of First Resource. The

assessment was carried out based on the results of focus group discussion which involved the surrounding community, namely representatives from Rimba Beringin Village, Suka Ramai Village, Kusau Makmur Village, and Summersari Village along with employee representatives at PT Arindo Trisejahtera on 15-17 December 2014.

Based on document verification, social impact management and monitoring plan that the unit of certification has implemented based on participatory results with affected parties. The program has included an issues management schedule and PIC. Social management and monitoring plan has been developed with the participation of affected stakeholders. The form of stakeholder involvement is through discussions and interviews. There is recorded evidence in the form of the attendance list of activities public hearing on 25 January 2022. The event was attended, among others, by head of villages, community leaders, as well as unit of certification's employees. Based on interview with surrounding community, relevant agencies, and internal stakeholders, the unit of certification has identified and managed social impacts such as social assistance, infrastructure improvements, land ownership licensing processes, etc. During the audit, the unit of certification has shown a document of social impact management and monitoring plan activities for the period 2022. All components have been included in this report of Social Impact Management and Monitoring 2022. This has been included components such as programs of communication with stakeholders, improving the quality of education, improving the quality of health, improving the community's economy, and environmental management.

Based on results of consultation with workers' representatives, there is no form of discrimination against workers, no underage workers were found, the unit of certification has also fulfilled the rights of its employees, and the unit of certification has provided several critical facilities for employees, such as housing, water, electricity, places of worship, public facilities, and other facilities. Unit of certification also allocates resources for the maintenance of the entire facility. The resource persons also stated that they could voice their views through their representative institution or a spokesperson they choose in the evaluation activities to review and develop mitigation plans and monitor the success of the implemented projects.

Based on result of interview with representatives of Suka Ramai Village and Danau Lancang Village, it is known that unit of certification has routinely carried out social identification/study in their village carried out by the CSR Team, where the results will be used as a reference for making social management and monitoring programs whose target is the welfare of the surrounding community. The assistance provided has covered all levels of society and all impacts also has been covered in program established by unit of certification.

3.4.3

Unit of certification has made efforts to implement the management and monitoring of social and environmental impacts as described in indicator 3.4.2. In addition, unit of certification also periodically updates the administration in a participatory manner. Some documentary evidence of the actions that have been made are as follows:

EIA

The company has documents, the implementation of the results of the environmental permit including reports to agencies in the form of RKL-RPL documents which are conducted every semester. The company can show proof of reporting in the form of a document affixed with a stamp, the name and signature of the recipient which is sent to relevant agencies that explain in indicator 1.1.2 related to Environmental Aspect. The implementation of environmental management and monitoring is carried out in accordance with the direction of the RKL-RPL as described in indicator 3.4.1. The effectiveness of environmental management and monitoring can be seen from the results of environmental management and monitoring analysis, which can also be seen from the suitability between the management and monitoring plans and their implementation in the field. The RKL-RPL document also shows that the company has managed all the impacts recommended in the UKL-UPL Documents. In general, the forms of evaluation carried out by the company include Trend Evaluation, Critical Level Evaluation and Compliance Evaluation.

Based on the results of field observations, it can be seen that the company has carried out environmental management by the environmental management and monitoring plan by installing a signboard for the conservation area. In addition, there are also markings in the form of stakes and red paint for spray boundary areas and other chemical applications. Based on the results of interviews with sprayer and fertilizer officers, they also stated that they were aware of the prohibition on the use of chemicals in the buffer zone marked in red.

Social Impact Assessment (SIA)

Unit of certification has shown evidence of implementing the social impact management plan, reviewed, and updated in a participatory manner with affected stakeholders. This review has been conducted annually. Based on result of interview with representatives of Suka Ramai Village and Danau Lancang Village, it is known that unit of certification has routinely carried out social identification/study in

their village carried out by CSR Team, where the results will be used as a reference for making social and environmental management and monitoring programs whose target is the welfare of the surrounding community. Unit of certification has the following documents:

- Evaluation of Social Impact Assessment through Social Management and Monitoring of PT Subur Arum Makmur 2022 which was carried out on 25 January 2022 involving representatives of the surrounding community such as Danau Lancang Village and Senamanenek Village, as well as company employee representatives. The results of the evaluation show the implementation of social impact management including communication programs with stakeholders, improving the quality of education, improving the quality of health, improving the community's economy, and environmental management.
- Evaluation of the Social Impact Assessment through Social Management and Monitoring of PT Arindo Trisejahtera 2022 which was carried out on 25 January 2022 involving representatives of the surrounding community such as Rimba Village, improving the community's economy, as well as environmental and infrastructure management.

The evaluation results in 2022 discussed the implementation of social impact management and monitoring in 2019-2021 as feedback for the social impact management and monitoring plan in 2021-2023. Based on the results of interviews with representatives of the Danau Lancang Village community (PT Subur Arum Makmur), there are social impacts due to the existence of the company, namely the theft of palm fruit from the company by the community in the village at the end of 2022. In addition, the results of interviews with community representatives in Suka Ramai Village (PT Arindo Trisejahtera) stated that there was a flood that occurred in the river in Suka Ramai Village at the end of 2022. This river was crossed by companies around Suka Ramai Village, one of which was PT Arindo Trisejahtera. The results of the document review above, these two social impacts have not been included in the 2019-2021 social impact management and monitoring plan and implementation. Based on the results of interviews with company representatives, an evaluation of the 2022-2023 social impact management and monitoring plan will be carried out in early 2023. Thus, unit of certification has the opportunity to ensure that all emerging social impacts have been implemented, monitored and updated periodically in a participatory manner. (OFI)

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1

The company has procedures for recruitment, promotion, retirement and termination of employees which are contained in:

- SOP of Recruitment and Selection number FR.CHR.R&S.002 revision 1 dated November 1st, 2012, which has been approved by VP HR. Based on interviews with management representatives, it is known that the procedure is still valid and there has been no change.
- SOP of Employee Promotion number FR.CHR.L&D.004 revision 1 dated July 1st, 2012, which has been approved by CEO. Based on interviews with management representatives, it is known that the procedure is still valid and there has been no change.
- SOP of Employee Performance Appraisal number FR.CHR.MNK.0001 dated November 1st, 2012, which has been approved by VP HR. Based on interviews with management representatives, it is known that the procedure is still valid and there has been no change.
- Collective Labor Agreement PT SAM and PT ATS period of 2021 – 2023. The document describes the procedures for recruitment, selection, acceptance, promotion, retirement and termination of employment.

Routine socialization regarding procedures and Collective Labor Agreement is given to workers, for example during morning briefing. Based on the results of interviews with workers in plantation units and factories as well as bipartite representatives, it is known that workers have understood the recruitment, selection, promotion and other employment procedures contained in company regulations and other procedures.

From this explanation it can be concluded that the unit of certification has procedures for recruitment, selection, acceptance, promotion, retirement and termination of employment.

3.5.2

The unit of certification has been always documented all labor procedures. The following are examples of employment procedures that have been implemented and well documented by the company, for example:

- Recruitment of workers, for example, the employee with the initials DAT sends an application letter and attaches a personal identity document (copy of e-KTP, family card, curriculum vitae, graduation/last education certificate, etc.). The worker is accepted to work as a permanent daily worker with the condition of serving a probationary period of 3 months. The unit of certification shows the work agreement letter of permanent daily workers number 02.0.4/SPK/HRD/074.A/VIII/2022 which explains that

workers with the initials DAT are accepted as harvest worker on August 31st, 2022. At the recruitment stage, this workforce has been selected based on the applicable procedures, namely through the stages of administrative selection, medical examination, and interviews. Then, the unit of certification also shows supporting evidence in the form of a copy of the work agreement document given to the worker. This is indicated in the document proof of handover of a copy of the work agreement. Based on the results of interviews with workers, information was obtained that the certification unit does not retain personal documents and there is no fee at the time of recruitment.

- Decree number GM/SK-INT/06/III/2020 regarding the appointment of an employee with the initials AP dated April 1st, 2020. The worker was appointed as a permanent daily employee after undergoing a 3-month probationary period as a loading ramp officer at the mill unit.
- Workers' retirement documents with the initials HT listed in the Collective Agreement number 2951/HR-SAM1/VI/2022 dated June 13th, 2022. The unit of certification shows the official report and documentation of severance pay, long service awards and compensation for workers' rights, the calculation of which has been adjusted to the applicable laws and regulations.

The explanation above proves that the unit of certification has implemented proper and documented work procedures for each worker.

Status: Comply

3.6

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

3.6.1

The CH shows the results of risk identification at SAM Estate, Petapahan-1 Estate and Petapahan-2 Estate. For example, there are documents on Hazard Identification and Risk Assessment in Petapahan-1 Estate and Petapahan-2 Estate which were prepared for the period January-December 2022. In these documents all potential hazards have been identified in all units, identification of existing constraints, OHS risk analysis, pre-assessment of risks. Controlled, risk control, risk assessment after being controlled and the person in charge of the activity. Hazard source analysis, assessment and risk control are made by the OHS Committee Secretary who has a General OHS Expert certificate. The document describes hazard identification in each unit or activity, such as nurseries, *land clearing/replanting*, mechanical road maintenance, manual road maintenance, mechanical ditch washing, stump clearing, raking discs, saplings and palm saplings, spraying, fertilizing, , fertilizing, infusion of micro fertilizer, land application, application of empty pods, sprader, generator engine, *TUS* car, school bus, *DT* driver, inspection of gupon, pruning, harvesting, harvesting at high voltage locations, FFB transportation, fire towers, hotspot monitoring, census Plant Pest, filling the fuel tank, activities on the road, electric welding, welding/cutting, grinding, drilling, electrical installation, changing tires.

Hazard Identification and Risk Assessment at SAM Estate, Petapahan-1 Estate and Petapahan-2 Estate have covered all operational activities in the field.

The certification unit has socialized this company policy to employees and stakeholders including Socialization of first aid, hazardous and toxic materials symbol, hazardous and toxic waste symbols, HIRAC, HCV, waste management, harvesting and maintenance work techniques (spray and fertilizer), company policies, flow of complaints and introduction to RSPO SCCS which was held on December 5th, 2022, and was attended by 16 PT ATS foremen.

Based on the description above, it shows that the company has assessed the risks and identified OHS problems in all parts of the certification unit.

3.6.2

The company shows evidence of K3 operator training certificates in the plantation and factory units at PT. SAMS, namely:

NO	CERTIFICATE	DATE	NAME	POSITION	UNIT	OPERATOR	LICENSE PERIOD
1	852/AMU/K3-MD/XII/2022	1 Dec 2022	AM	Engine room operator	POM	Motor Diesel Class 1	1 Des 2027
2	865/AMU/K3-MD/XII/2022	1 Dec 2022	S	Engine room operator	POM	Motor Diesel Class 1	1 Des 2027
3	5/24193/AS.02.00/XI/2021	18 Nov 2021	RM	Engine room operator	POM	Aircraft Power and Production	18 Nov 2026
4	899/OPK3/B.1/IX/2014	24 Sep 2014	SL	Sterilizer operator	POM	class 1 steam plane	30 Apr 2024

5	29958/BDI-MEDAN/BOILER-XII/X/2018	13 Oct 2018	AM	Boiler operator	POM	class 1 steam plane	23 Nov 2023
6	900/OPK3/B.1/IX/2014	26 Sep 2014	HK	Boiler operator	POM	class 1 steam plane	30 Apr 2024
7	1612/OPK3/B.1/XI/2018	23 Nov 2014	NP	Boiler operator	POM	class 1 steam plane	23 Nov 2023
8	2188/OPK3/PAA-LT/II/2019	04 Feb 2019	SD	Grader Operator	POM	Motor Grader	04 Feb 2024
9	2191/OPK3/PAA-LT/II/2019	04 Feb 2019	PP	Compactor Operator	POM	Compactor	04 Feb 2024
10	05/34278/AS.02.00/XII/2021	20 Dec 2021	SP	Wheel Loader Operator	Estate	Wheel loader	20 Des 2026
11	2189/OPK3/PAA-LT/II/2019	4 Feb 2019	EJ	Excavator Operator	POM	Excavator	04 Feb 2024
12	5/0296210722/AS.01.04/VII/2022	21 Jul 2022	SBP	Mechanic	Estate	Class II Welder	21 jul 2027
13	2995/PK3-P3K/IV/2019	15 Apr 2015	RN	Mechanic	Estate	First Aid Staff	15 apr 2024

In addition, there are several OHS training certificates for plantation and factory unit operators at PT. ATS, namely:

STATION	NAME	POSITION	OPERATOR LICENSE	LICENSE PERIOD
Engineering	RH	Mechanic	Aircraft Power and Production (11105/PM/PTP/XI/2021)	18 Nov 2026
	EI	Mechanic	Aircraft Power and Production (11108/PM/PTP/XI/2021)	18 Nov 2026
	M	Grader Operator	Aircraft Power and Production (2182/OPK3/PAA-LT/II/2019)	03 Feb 2024
Estate	BM	Driver DT	Lift and transport aircraft (10372/OPK3/PAA-LT/V/2019)	19 May 2024
	PS	Driver DT	Lift and transport aircraft (10371/OPK3/PAA-LT/V/2019)	19 May 2024

The CH shows the work program for implementing the occupational health and safety management system of PT. SAM and ATS, among others, proposed external training for certification of production personnel operators, steam aircraft operators, transport and lifting equipment operators, hyperkes, General OHS expert, Electrical OHS expert, first aid officers and welder certification from June to November 2023.

The results of observations and interviews at the PT. SAM, note the name of the operator according to the division of the team and working hours, as follows:

- Engine Room Station has 3 Shifts with operator names & shift distribution as follows:
 - Shift 1: Riki Muherli
 - Shift 2: Suroso
 - Shift 3: Triska

Based on information from the Riau Province Manpower and Transmigration Office, not all workers who operate heavy machinery and equipment have attended relevant OSH training.

Based on the applicable provisions, including:

- Ministerial Regulation No. 38 of 2016 concerning occupational safety and health of production-powered aircraft, types of machine tools and conventional production must have OHS coaching qualifications for class II operators.
- Ministerial Regulation No. 12 of 2015 concerning K3 electricity in the workplace, an electric voltage > 50 volts alternating current or 120 volts direct current must have an electrician's K3 expert.

- Ministerial Regulation regarding first aid in workplace accidents No. Per. 15/MEN/VIII/2008 that workplaces with low potential must have 1 first aid worker every 150 people.

Based on the above information it is known that:

- Not all shifts have operators who have attended K3 coaching certification training for factory machine operators.
- The company only has 1 first aid worker who is not in accordance with the ratio of the existing workforce at PT Subur Arum Makmur. Meanwhile, PT Arindo Trisejahtera does not have a licensed first aid worker.
- Do not yet have personnel who have the competence of K3 electricity experts.

The company has not been able to show enough evidence that the effectiveness of the OSH plan has been monitored to deal with OSH risks to people through a trained workforce. **NCR No. 2023.02**

3.6.2 Status: NCR No.2023.02 with Major Category

3.7

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

3.7.1

The unit of certification has identified and developed a training program related to aspects of the RSPO P&C for all staff, workers, smallholders and local stakeholders in 2022. The following are the results of the identification and training program plans listed in the Learning and Development year of 2023 and Training Record year of 2022, among others:

- GAP Competency, Mill Operational and Maintenance, Socialization first aid and OHS, firefighters, IPM Control for foremen, administration and mechanics.
- Training on work techniques (harvest, spray and fertilizer), IPM, PPE, HCV, for estate workers.
- Training on operator work techniques, HIRAC, OHS, PPE and management of hazardous and toxic waste materials for mill workers.
- Training and socialization of RSPO certification system, HCV, pesticide use, and communication procedures for contractor workers, smallholders, stakeholders, and communities around the company.

3.7.2

The unit of certification shows the minutes document for the realization of the 2022 training program, for example:

- Socialization of first aid, hazardous and toxic materials symbol, hazardous and toxic waste symbols, HIRAC, HCV, waste management, harvesting and maintenance work techniques (spray and fertilizer), company policies, flow of complaints and introduction to RSPO SCCS which was held on December 5th, 2022, and was attended by 16 foremen PT ATS.
- Socialization of first aid, hazardous and toxic materials symbol, hazardous and toxic waste symbols, HIRAC, HCV, waste management, harvesting and maintenance work techniques (spray and fertilizer), company policies, flow of complaints and introduction to RSPO SCCS which was held on December 13th, 2022, and was attended by 17 foremen PT SAM.
- Socialization on standards for the use of PPE, HIRAC, management of hazardous and toxic waste materials and an introduction to the contents and functions of first aid which was held on September 12th, 2022, and was attended by 18 mill workers.
- Training on pest identification in oil palm plantations and integrated pest management, which was held on May 26th, 2022, and was attended by 15 spray workers.
- Training on spray limits, fertilizer limits and introduction to wild animal species which was held on January 14th, 2022, and was attended by 8 representatives of spray and fertilizer workers
- Socialization on the use of PPE which was held on February 10th, 2022, and was attended by 10 harvest workers.
- Socialization regarding of RSPO and stakeholder meeting which was held on November 23rd, 2022, and was attended by 30 participants. The agenda discussed the RSPO certification system, HCV, use of pesticides, communication procedures and delivery of spray PPE for oil palm smallholders around the company.

Based on the results of interviews with workers, contractors and village community representatives Danau Lancang and Suka Ramai Village, it is known that every year the company organizes training and outreach programs to all parties around the company. The resource persons also understood the results of the training activities, for example the harvest workers in Block L19 – L20 Afdeling 3 SAM Estate stated that all harvest workers had received training on how to harvest.

Based on the description above, the unit of certification has proven that there are training activities for all staff, workers, plasma smallholders and stakeholders. Records of training activities have been maintained in the minutes document.

3.7.3

UoC 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 December 2022 for weighbridge operator, laboratory, and admin. Based on the interview with all workers involved in supply chain operations, such as security (for FFB receiving verification), weighbridge operator, and the PIC related to supply chain, they have been understood the supply chain mechanism, and the MB record has conducted and monitored quite well.

Status: Comply

3.8
Supply Chain Requirements for Mills
3.8.1; 3.8.2

Subur Arum Makmur Mill was used RSPO supply chain of Mass Balance module because mill received certified dan uncertified FFB.

3.8.3

Estimates of CPO and PK produced by Subur Arum Makmur Mill obtained from the projection based on actual data of 12 months before audit activities, here's the detail:

	Last Year Projected Certified Volume (MT)	Actual Certified Volume from March 2022 to January 2023 (MT)	Estimation for the next 12 months
FFB Processed (Estate)	283,000	228,852.89	265,900
CPO Production	62,260	47,032.59	55,800
Palm Kernel (PK) Production	14,150	13,248.12	15,500

3.8.4

The Mill have been registered in RSPO Palm Trace as PT Subur Arum Makmur with License ID CB131075, and Member ID RSPO_PO1000004231

Whole transaction of CSPO/CSPK for period license on March 2022 to February 2023 has been declared in RSPO IT Platform. Related to CSPK transaction, auditee informs that there's CSPK sold as physical as amount as 9,972.51 MT and there's CSPO sold as physical as amount as 981.46 MT.

The auditors verify related to transactions on the Palmtrace platform with actual sales of certified products, for example of transaction record on 1 August 2022, where there was a sale of 83.42 ton (3 times transport) of CSPK with details of recordings of weighing cards on that date to PT Adhitya Serayakorita and this was in accordance with the transactions made at RSPO Palmtrace. Where, the shipping announcement was made on 25 May 2022 and confirmed by the recipient on 28 May 2022.

3.8.5

Subur Arum Makmur Mill had procedure for SCCS with MB or IP model in document Supply Chain Policies and Procedures dated December 20, 2018, and revised April 22, 2021 (FR.CSM.MRPR rev 01). The references used have adjusted to the certification system and PnC in 2020. The procedure has covered all elements of supply chain model requirements such as: appointment of person in charge (PIC) for SCCS application and role of implementation and technical procedure towards recording for receiving and processing of RPO certified and non-certified products (FFB, CPO and PK). The company's procedures have been revised in accordance with the latest RSPO SCCS system reference (Revised 01 February 2020).

3.8.6

The Procedure to conduct annual internal audit are describe in document Supply Chain Policies and Procedures dated December 20, 2018, and revised April 22, 2021 (FR.CSM.MRPR rev 01). The procedure aims to enforce criteria, methods, responsibility for implementation internal audit of RSPO. Internal audit conduct annually by Certification Department, with approval by Management Representative. Internal audit and corrective action report will become one of management review agenda.

Internal audit was held on December 2022 for all business unit (Estate and Mill) and there is no non-conformity related to supply chain indicators.

3.8.7

Based on the results of the document review and field observations, the following evidence was obtained:

- Based on Supply Chain Policies and Procedures dated December 20, 2018 and revised April 22, 2021 (FR.CSM.MRPR rev 01) it is known that the mills ensure the traceability of FFB supplied to RSPO certified and non-RSPO certified mills.
- Based on the results of field observations at Subur Arum Makmur Estate, there are blocks that are outside the scope (beyond the boundaries of the HGU markers), namely in blocks S8, S9, S10 (between HGU Marks No. 57 and 58).
- Based on a review of FFB receipts for the period February 2022 to January 2023, all FFB originating from Subur Arum Makmur Estate is RSPO Certified FFB. This was also reinforced by the results of interviews with weighbridge operators at Subur Arum Makmur POM.

Based on this evidence, there is not enough evidence that the recording of certified and non-certified FFB sources is carried out in its entirety. **NCR No.2023.01 with major Category**

3.8.8

The company shows documentation of certified products, such as sales contracts, shipping announcements, delivery orders, etc. These documents explain the name and contact person of the buyer and seller, date of delivery, product description, RSPO Certificate ID, quality, quantity, member ID, and others. The transaction also including RSPO certificate number, such as evidence of transaction record of CSPO on 24 November 2022 with information:

- Quantity : 27,940 kg
- Seal Number : 0318097-0318102
- Time : 12:34 WIB
- Weighbridge Card : AM1-20221100397
- Driver : Ponidi
- No. Police : B9724UFV
- FFA : 5.18
- DO No. : 2238/DO-SAM/XI/2022
- Buyer : PT Adhiyta Serayakorita (KCP)
- Supply Chain: MB
- Certificate No.: MUTU-RSPO/143

Based on document review and interview with management representative, the company sold CSPO and CSPK physically as certified product.

3.8.9, 3.8.10, 3.8.11

The physical handling of product is conducted by mill itself since FFB receive in grading station and processed to CPO and PK, except the transportation of product and storage tank at bulking are sourced to third party, which bonded by the agreement. Currently, there is 2 contractors for CPO and PK transport, for instance as shows through several Work Order Letter as follows:

- CV Teman Setia (CPO transporter), agreement No. 6249/SAM/XI/2022 dated November 2022.
- PT Berkat Karimar Mandiri (CPO transporter), agreement No. 6229/SAM/XI/2022 dated November 2022.
- PT Berkat Karimar Mandiri (PK transporter), agreement No. 6287/SAM/XII/2022 dated December 2022.

The agreement also informs that the carrier is willing to be audited by a third party regarding SCCS and RSPO. This was also clarified from the results of interviews with representatives of CV Teman Setia where he stated that he was ready to be audited by a third party regarding the RSPO. There is no new contractor after previous assessment.

3.8.12

Subur Arum Makmur Mill has record of all CSPO and CSPK information from the previous 3 years (starting from the period the company obtained the RSPO certificate). The following is a sample mass balance recording for the last 12 months:

Crude Palm Oil

Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)			Total
	Cert	Non-Cert		Physical	Other Scheme	Non-Cert	
Feb 2022 to Jan 2023	55,006.26	16,003.98	71,010.24	983.29	41,878.14	-	42,861.43

Based on record verification, there's CSPO sold as certified product physically as amount as 983.20 MT.

Palm Kernel

Period	PK production (MT)		Total	Cert PK Dispatch (MT)			Total
	Cert	Non-Cert		Physical	Credit	Non-Cert	
Feb 2022 to Jan 2023	15,547.83	4,520.71	20,068.54	12,066.33	-	-	12,066.33

Based on record verification, there's CSPK sold as certified product on license period as amount as 12,066.33 MT.

3.8.13; 3.8.14 & 3.8.15

The mill has been defined the extraction rate dividing CPO or PK production by the total FFB process, for example, the OER value in February 2022 is 19.6 % based on the amount of CPO (4,534 tons) divided by the total processed FFB (22,137 tons). The implementation based on company procedures (*Penimbunan dan Pengiriman CPO dan Kerne*, MN.FR.COP.OPM.PPK, 31 December 2015). The sounding process for quantity product calculation done by head of administration (KTU) every morning.

3.8.16

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

- Member Name: PT Subur Arum Makmur
- Membership No.: 1-0047-08-000-00 (First Resources Limited)
- Member ID: RSPO_PO1000004231
- License ID: CB131075

Whole transaction of CSPO/CSPK for period license on March 2022 to February 2023 has been declared in RSPO IT Platform. Related to CSPK transaction, auditee informs that there's CSPK sold as physical as amount as 9,972.51 MT and there's CSPO sold as physical as amount as 981.46 MT.

From shipping announcement verification, known that shipping announcement carried out not more than 3 months after dispatch. For example, on 24 November 2022, where there was a sale of 79.55 ton (3 times transport) of CSPK with details of recordings of weighing cards on that date to PT Adhitya Serayakorita and this was in accordance with the transactions made at RSPO Palmtrace. Where, the shipping announcement was made on 19 January 2023 and confirmed by the recipient on 25 January 2023.

3.8.17

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

Based on management representative interview and document review, the mill does not use trademark on its sales activities and communication.

3.8.7 Status: NCR No.2023.01 with Major Category

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

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

4.1.1

The unit of certification has made a policy to respect human rights as outlined in the Decree of the Board of Directors Number 018/Sustainability_FR/P/03/2015 regarding of human rights and policy dated March 15th, 2015, which was signed by Managing Director.

The policy states the principles that the certification unit is committed to complying with laws and regulations in the field of employment and upholding human rights in the framework of developing sustainable oil palm plantations. This policy is available in Indonesian and has been communicated to all employees and local stakeholders. For example, the socialization of human rights policies on December 13th, 2022, which was attended by 17 representative workers. This policy has also been disseminated to external stakeholders, for example to contractor workers and FFB suppliers at the time of signing the contract.

Based on the results of interviews with labor union representatives, gender committees, local contractors and representatives of the Danau Lancang and Suka Ramai village community, it is known that there were no incidents of human rights violations in the certification unit, no employees were intimidated and/or experienced violence by the certification unit.

4.1.2

The unit of certification does not have records regarding the use of force/army/paramilitary in resolving conflicts/problems that exist between the unit of certification and relevant stakeholders (local communities, workers, or others). This has been stated in the Sustainable Palm Oil Policy date July 1st, 2015, which was signed by CEO. The document explains that the company is committed to resolving conflicts in an open, transparent and consultative manner.

Based on the results of interviews with representatives of labor union and representatives of the gender committee and external stakeholders, it is known that the unit of certification does not use paramilitaries or mercenaries in the company's operational areas. If there is a problem, it will be resolved by means of deliberation without resorting to violence. Resolution of conflicts/problems with deliberations is quite effective.

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

The certification unit has Communication SOP Number FR.EMS.CIE Revision 2 issued November 22nd, 2018, which has been approved by the CEO. The procedure explains that the steps for submitting complaints can be submitted in writing and orally through staff appointed as communicators. The time needed to respond to complaints is no later than one month. Then, Article 3.14.3 states that the management of the certification unit will guarantee the anonymity of the reporter/whistle-blower including confidentiality, security, reputation and reputation for stakeholders who submit confidential information to the certification unit. In addition, article 3.16 explains that complaints that have not been resolved by both parties can be submitted to the court which is agreed upon by both parties in accordance with statutory regulations and if the complaint still cannot be resolved by the court, then the complaint can be filed through the mechanism RSPO Complaint Panel.

In addition, the certification unit also has a reporting/complaint mechanism via email or the certification unit hotline that maintains the confidentiality of the reporter. Hotline numbers and complaints emails are located at each plantation and mill office as well as in public places that are easily visible. With the existence of a sign board, it is hoped that all parties can easily submit complaints/conflicts to the designated communicator if there are irregularities or violations that occur within the certification unit environment.

Based on interviews with employees in plantation and mill units, internal stakeholders (work unions and gender committees), representatives of security service contractors, representatives of village communities (Danau Lancang and Suka Ramai Village) and government agencies in Kampar District, it was revealed that they understand how to communicate and consult with companies due to procedures related to complaints and conflict. The unit of certification periodically conducts outreach regarding the complaints and complaints handling system during morning briefings or during regular meetings with organizations/stakeholders. For example, on December 5th, 2022, to 16 representative workers at Senamanenek Estate of PT SAM.

Based on the explanation above, it can be concluded that the unit of certification has a mutually agreed system, is open to all affected parties, can resolve disputes effectively, in a timely and appropriate manner.

4.2.2

The unit of certification has established a complaint handling system for all affected parties, which is documented in Communication SOP Number FR.EMS.CIE Revision 2 issued November 22nd, 2018, which has been approved by the CEO. In article 3.10.7, it is explained that for parties who cannot read or write, the complaint procedure mechanism will be conveyed using audio media (voice

recordings) and through representatives who can read and write. The certification unit also has a labor union and a gender committee which regularly hold meetings with workers, one of the agendas of which is to accommodate problems and complaints directed at the certification unit.

From the results of interviews with workers and representatives of the surrounding community, they already know about communication procedures and with people who serve as communicators between the company and workers/community so that those who cannot read/write can inform the relevant communicators.

From the description above, it can be concluded that the unit of certification already has procedures for conveying information and the system has been understood by affected parties, including those who cannot read and write.

4.2.3

Based on the results of a review of the recapitulation of employee and recording of incoming and outgoing letters from stakeholders in 2022, it was found that there were complaints from workers, internal or external stakeholders, for example as follows:

- Complaint from an employee with the initials SL (PT SAM worker) on February 21st, 2022, who filed a complaint regarding repairs to a leaky roof. Then the unit of certification responded to the complaints submitted by carrying out repairs to the roof of the house on February 25th, 2022.
- Complaint of an employee with the initials BS (PT ATS worker) on December 13th, 2022, who filed a complaint regarding one water machine unit in the employee's housing being damaged. Then the certification unit responded to the complaints submitted by carrying out repairs to the water machine on December 21st, 2022. The certification unit also showed evidence of replacing the roof of the worker's house.

Based on the results of interviews with workers in the plantation and factory units, local contractors, representatives of the Danau Lancang and Suka Ramai Village community and government agencies in Kampar Regency, it was obtained information that they understood the flow of information submission if there was a complaint to the unit of certification. They also stated that the unit of certification was responsive in responding to complaints submitted.

From the description above, it can be concluded that all complaints have also been thoroughly resolved by the certification unit by showing proof of completion in the form of documentation and direct responses regarding complaints received from external and internal parties.

4.2.4

In the Communication SOP Number FR.EMS.CIE Revision 2 issued November 22nd, 2018, which has been approved by the CEO, explained that if after several deliberations the two parties have not reached a resolution and agreement, both parties need to agree on the existence of a mediator as a third party who can help reach a settlement and agreement.

Based on the results of the document review, it is known that so far no conflicts have been reported to PT SAM and PT ATS. The results of interviews with all parties such as workers, internal stakeholders (work unions and gender committees), representatives of security service contractors, representatives of the people of Danau Lancang Village and Suka Ramai Village, state that the conflict resolution mechanism can use options to obtain legal and technical assistance from independent parties, where the reporter has the freedom to choose. A person or group that can support it and/or act as an observer and the parties can choose the option of involving a mediator (third party).

Based on the explanation and description above, it can be concluded that the unit of certification has a conflict resolution mechanism/procedure that includes options for obtaining legal and technical assistance from independent parties.

Status: Comply

4.3

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

4.3.1

Contributions to community development based on the results of consultations with local communities can be demonstrated by meetings between community representatives and the company in 2021 as the basis for CSR plans for 2022. Many program activities have been realized by the company in the 2021/2022 period, for example assistance to the Sari Delilah Farmer Group for Watermelon and Chili Cultivation in Danau Lancang Village in June 2022.

One of the development contributions to the community is carried out by local purchases to shops around the company, cooperation with local contractors in plantation and factory management activities and the implementation of CSR activities which are arranged annually in the context of the welfare of the surrounding village communities.

Besides, unit of certification has also evidence of implementing CSR plan, reviewed, and updated in a participatory manner with affected stakeholders. Based on result of interview with representatives of Suka Ramai Village and Danau Lancang Village, it is known that unit of certification has routinely participated in CSR discussion with their village where the results will be used as a reference for making CSR programs whose target is the welfare of the surrounding community.

Status: Comply

4.4

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

4.4.1

The scope of certification consists of 2 entities namely PT Subur Arum Makmur and PT Arindo Trisejahtera. The land rights owned by the company are in the form of HGU, the following is an explanation for each entity:

PT Subur Arum Makmur

- Decree of the state minister for Agrarian Affairs Number 65/HGU/BPN/98 dated 21 September 1998, which granted PT Subur Arum Makmur an HGU for 35 years covering an area of 7,767 ha in Tapung District, Kampar Regency, Riau Province.
- HGU Certificate No. 131 covering an area of 7,767 ha which ended on September 21, 2033.
- Decree of the Head of the National Land Agency Number: 76/HGU/BPN RI/2019 Concerning the Granting of Cultivation Rights in the Name of PT Subur Arum Makmur for Land in Kampar Regency, Riau Province on June 5, 2009, which granted HGU with an area of 1,504.03 located in Senamanenek Village and Danau Lancang Village, Tapung Hulu District, Kampar District, Riau Province.
- HGU Certificate No. 184 covering an area of 102.93 ha which ended on June 22, 2044.
- HGU Certificate No. 185 covering an area of 237.55 ha which ended on 22 June 2044.
- HGU Certificate No. 183 covering an area of 679.50 ha which ended on 22 June 2044
- HGU Certificate No. 182 covering an area of 484.05 ha which ended on 22 June 2044.

PT Arindo Trisejahtera

- Decree of the Minister of State for Agrarian No. 13/HGU/1993 concerning the Granting of Cultivation Rights on behalf of PT Arindo Trisejahtera, Pekanbaru over land in Kampar Regency, Riau Province with an area of 7,741.40 ha in Sinamanenek Village, Siak Hulu District, Kampar Regency, Riau Province on June 9, 1993.
- HGU Certificate No.1 covering an area of 3,471.4 ha ending December 31, 2028.
- HGU Certificate No. 2 covering an area of 4,270 ha which ended on 31 December 2028.
- Decree of the Head of the Regional Office of the National Land Agency of Riau Province No. SK.04/HGU/BPN.14/2010 (January 22, 2010) regarding the Granting of Cultivation Rights on Name of Limited Liability Company Arindo Trisejahtera on Land Located in Senamanenek Village, Tapung Hulu District, Kampar Regency with an area of 138.896 ha for 35 years.
- HGU Certificate No. 192 covering an area of 138.896 ha which ended on March 11, 2045.
- Decree of the Head of the National Land Agency of the Republic of Indonesia No. 10/HGU/BPN RI/2011 (7 March 2011) concerning the Granting of Cultivation Rights in the Name of PT Arindo Trisejahtera for land in Kampar Regency, Riau Province covering an area of 495.95 ha for 35 years.
- HGU Certificate No. 197 covering an area of 495.95 ha which ended on March 24, 2046.

Based on this evidence, the current scope of certification is 17,647.276 ha.

4.4.2

Based on latest assessment, no additions are made to the company's operations. Land acquisition was carried out in stages starting from 1993 to 2000. Land compensation documents along with the negotiations have been well documented and stored in the Pekanbaru Branch Office. The documents stored are, documents related to the process of land compensation, proof of payment, documentation of activities, to a participatory map between the seller and the company. For example, the compensation document in the name of Nazaruddin DF which consists of:

- Letter of receipt of compensation on behalf of Nazaruddin DF in Lindai Hamlet signed by both parties with material evidence.
- List of Inventory of land, plants, and other businesses in the context of area acquisition for PT. Arindo Trisejahtera which contains information on name, area, type of plant, land boundary, and is known by the local government (sub-district, village, regent, land).

4.4.3

The company's operational area has been included in the HGU certificate document which contains information on an area map with a scale of 1 : 50,000. The document clearly shows the boundaries of the company's area. Based on document review, known that previous land acquisition did not diminish community's legal rights. Based on land acquisition documents, known that the documents made in Indonesia language, it can be seen that the company obtained the right to cultivate from community land that has been acquired and comes from the status of the forest area that has been released through the Decree of the release of forest area from the Minister of Forestry.

4.4.4; 4.4.5; 4.4.6

Based on latest assessment, there was no increase in the company's operational area. The last land compensation process was carried out in 2000. During the release of land, in general, the owner of the land acts as a representative for himself. Regular reviews of the FPIC process are embodied in the SIA document which functions to highlight the social issues of the affected people including land issues. All records were made in Indonesian, clear proof of payment and signed by both parties between the company and the land seller (local community) without coercion.

Status: Comply

4.5

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

4.5.1; 4.5.2; 4.5.3; 4.5.4; 4.5.6; 4.5.7; 4.5.8

Until latest assessment was implemented there was no expansion of the area or new planting. This was evidenced by the results of public consultations with the community and the absence of additional *GRTT* records before 2000. The certification unit can show land compensation documents which include informing about news. Measurement program, master map of the compensation area, certificate of ownership, statement of relinquishment of land rights, map of the area to be compensated, receipts for compensation payments. The documents for the compensation process have been signed by both parties and are known to local officials such as the village head, sub-district head and witnesses. Existing and well-documented agreements are one that the FPIC process has implemented.

The Company has FPIC procedure code FR.EAC.FPC rev 02 dated 15 April 2022. Procedures explaining the land compensation process through FPIC begin from identification of landowners, negotiating compensation, payment of compensation, etc. The purpose of this procedure is for interested parties to have the same understanding of FPIC in new developments for oil palm plantations. This policy also ensures a balanced position between the community and the government or company.

Based on the results of interviews with representatives of surrounding Villages (Danau Lancang and Mekarsari Village), there are no issues of dispute or other land issues with 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

The certification unit shows procedure of FPIC procedure code FR.EAC.FPC rev 02 dated 15 April 2022. Procedures include explaining the land identification process, outreach to the community, physical inventory, to the compensation process.

Completeness of compensation payment documents: receipts, documentation, identification cards (*KTP*), minutes of land over and compensation, certificates of land ownership, statement letters, detailed maps of land and attendance lists of land measurements.

4.6.3

Until the latest assessments were carried out there were no new *GRTTs*. The last land acquisition was carried out before 2000. The

company has procedure of Land Acquisition and Compensation on FPIC procedure code FR.EAC.FPC rev 02 dated 15 April 2022. The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right.

4.6.4

Until latest assessment was implemented there was no expansion of the area or new planting. This was evidenced by the results of public consultations with the community and the absence of additional *GRTT* records out before 2000. The certification unit can show land compensation documents which include informing about news. Measurement program, master map of the compensation area, certificate of ownership, statement of relinquishment of land rights, map of the area to be compensated, receipts for compensation payments.

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

The land compensation process was completed by the company in 2000. The Company has FPIC procedure code FR.EAC.FPC rev 02 dated 15 April 2022. Procedures explaining the land compensation process through FPIC begin from identification of landowners, negotiating compensation, payment of compensation, etc. The procedures also cover aspects of land acquisition, conflict resolution, information and participation, and allow for adequate community representation, negotiation and reaching binding agreements.

4.7.3

Based on the results of interviews with representatives of surrounding villages (Danau Lancang and Suka Ramai Village), the community benefits from the existence of the company, for example by the large number of villagers working for the company and also the development of plasma which of course increases the welfare of the community. They stated that prior to the existence of the company, the community's access to interact with other areas was only through rivers. After the company exists, the community can access the company's roads for daily activities.

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 certification unit has SOP for Social Conflict Handling on FPIC procedure code FR.EAC.FPC rev 02 dated 15 April 2022 and SOP FR.EMS.CIE about Communication Procedures (24 February 2020) which explains the steps in case of complaints from outside parties regarding release land or other grievances equipped with a flowchart for handling social issues.

Based on field observation, document review and public consultation with relevant stakeholder (Danau Lancang and Suka Ramai Village), there's no issue related to land conflict in company operational area. Related to the issue of KSU Tani Sawit Jaya which is circulating in electronic media is an issue that is in a different scope, namely at PT SAM II. As additional information related to this issue, on June 3, 2021, a field visit was carried out by a joint team coordinated by the Regional Secretary of Riau, namely the Plantation Service, Environmental Agency, Public Works and Public Housing Agency, National Land Agency, Community Representatives and SAM II to prove proof of land ownership and coordinates, and community could not show the polygon/field in question. The results of consultations with the Plantation Office of Kampar District, until now there has been no further development regarding this issue.

Based on the results of the study of the area statement documents, there are several areas occupied by other parties (Danau Lancang Village), from the company's explanation for these occupied areas are areas that have not been compensated by the company and will be removed from the HGU certificate in the future. The auditor made observations in these areas, for example in Block F34 (Subur Arum Makmur Estate) found that there were clear boundaries between the areas occupied and the areas managed by the company and there were no indications of damage or disturbance.

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1
The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.
5.1.1 & 5.1.2

Based on an interview with the Manager Mill, and also records of receipt of FFB during the 2022/2023 period, the company does not receive FFB from third parties (farmers or collectors). All FFB that enters the factory is a supplier that is still under the same management as First Resources Limited. For FFB originating from KKPA Bumi Sawit Perkasa (Scheme Smallholder), the price for FFB refers to the price set by the local Plantation Office.

The company shows evidence of FFB purchases from independent smallholders, for example on behalf of *KKPA Bumi Sawit Perkasa* for the period of November 2022 (payment on 30 November 2022). In the proof of payment of FFB to these farmers, the FFB price set is in accordance with the price determined by the Plantation Agency of Riau Province attached in the FFB Price Determination document as a result of the Technical Working Group Meeting of the FFB Purchase Price for Palm Oil Production from Partnered Smallholders in Riau Province for the period November 2022.

5.1.3

Based on the company's policy, 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.

5.1.4 & 5.1.8

Subur Arum Makmur POM is part of the PT Subur Arum Makmur and PT Arindo Trisejahtera entity which has a business license in 2000 so, there's no obligation for the company to develop plasma. However, the company received FFB from KKPA Bumi Sawit Perkasa which is a plasma built by PT Bumi Sawit Perkasa, where the entity is a subsidiary of First Resources Limited.

5.1.5 & 5.1.6

Based on contract agreement verification described in indicators 5.1.4 and 5.1.8, known that the agreement is conducted fairly, transparently and based on both party agreement. Has been observed, the payment process has been carried out transparently and there has never been a grievance related to the payment. An example of payment verified by the auditor is invoice and proof of payment for period for period November 2023. Where the calculation of payment is in accordance with agreement.

5.1.7

The results of document verifications it was known that the certification unit has routinely calibrated the weighing equipment carried out by a third party. There are 4 weighing equipment, along with calibration records:

- The certification unit has also shown documents on the weighbridge calibration (Serial Number P5B197A3922) carried out in 13 July 2022 and valid until 13 July 2023 by Legal Industrial and Commerce Department Kampar Regency (No.: 510.3/SKHP.3/UPT-ML/232).
- The certification unit has also shown documents on the weighbridge calibration (Serial Number 185150245) carried out in 30 September 2022 and valid until 30 September 2023 by Legal Industrial and Commerce Department Kampar Regency (No.: 510.3/SKHP.3/UPT-ML/324).
- The certification unit has also shown documents on the weighbridge calibration (Serial Number P5B17AA2242) carried out in 10 February 2022 and valid until 10 February 2023 by Legal Industrial and Commerce Department Kampar Regency (No.: 510.3/SKHP.3/UPT-ML/17).
- The certification unit has also shown documents on the weighbridge calibration (Serial Number P5B17AA2243) carried out in 10 February 2022 and valid until 10 February 2023 by Legal Industrial and Commerce Department Kampar Regency (No.: 510.3/SKHP.3/UPT-ML/18).

For calibration results that have expired, the company has sent a letter to the relevant agency on February 6, 2023. The company performs calibrations aimed at improving the integrity of FFB weighing from third parties and also minimizing scale fraud.

5.1.9

The company has a complaint handling mechanism for farmers in the SOP FR.EMS.CIE about Communication Procedures (24 February 2020) which explains the steps in case of complaints from outside parties regarding release land or other grievances equipped

with a flowchart for handling social issues. The procedure also explains that stakeholders can send complaints via e-mail to the Sustainability Department or send them to the estate office or representative office. Any information received will be followed up by the relevant unit. The company will respond as soon as possible or no later than 6 months after the letter request is received and complete or provide a follow-up response no later than 6 months after the request is received.

Based on document review of complaint book, there is no complaint from contractor, communities and other stakeholders on period 2022/2023.

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 & 5.2.5

Subur Arum Makmur POM is part of the PT Subur Arum Makmur entity which has a business license in before 2007. In the context related to plasma development, there's no obligation.

5.2.4

Subur Arum Makmur POM is part of the PT Subur Arum Makmur and PT Arindo Trisejahtera entity which has a business license in 2000 so, there's no obligation for the company to develop plasma. However, the company received FFB from KKPA Bumi Sawit Perkasa which is a plasma built by PT Bumi Sawit Perkasa, where the entity is a subsidiary of First Resources Limited.

5.2.2 & 5.2.3

Currently the company does not receive FFB from independent smallholders, and the company has no obligation to develop plasma. Regarding ISPO certification support, PT Bumi Sawit Perkasa's KKPA has been included in the time bound plan, where the plan for certification of the unit is in 2026.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1

The unit of certification already has a non-discrimination and equal opportunity policy as indicated in the:

- Decree of the Board of Directors Number 018/Sustainability_FR/P/03/2015 regarding of human rights and policy dated March 15th, 2015, which was signed by Managing Director.
- Decree of the Board of Directors Number 011.A/Sustainability_FR/P/VI/2022 regarding of equal employment opportunity policy.
- Sustainable Palm Oil Policy dated July 1st, 2015, which was signed by CEO.

The three documents explain that the unit of certification has a commitment not to discriminate against its employees. One of which is providing equal employment opportunities regardless of race, religion, degree, ethnicity, gender, skin colour, imperfection (disability), sexual orientation, political affiliation, organizational membership and age. This policy has been socialized in each unit to workers, for example the socialization on December 15th, 2022, which was attended by 11 representative workers. This policy has also been disseminated to all stakeholders, for example socialization to local contractors or FFB suppliers at the time of signing the contract.

The unit of certification does not discriminate and treats all workers fairly, the following is evidence that can be shown by the unit of certification listed in several employee list demographic documents, sample documents for worker recruitment and identification documents and the realization of worker training:

- Composition of workers consisting of various ethnic groups, religions, genders, and workers' origins.
- Recruitment of workers based on the results of selection, performance appraisal, ability and expertise of workers.
- Placement and training of workers is carried out according to their expertise/type of work, such as prospective harvest workers are placed as harvest workers and receive routine harvest training.
- Women workers are given reproductive leave rights, wages and the same opportunities for promotion as male workers in the same type of work.

The results of interviews with workers, labor union representatives and representatives of the gender committee also obtained

information that there was no indication of discrimination against religion, ethnicity, gender, and regional origin in the process of accepting a job. So, it can be concluded that the unit of certification has treated all workers fairly without discrimination.

6.1.2

Based on the results of verification of worker recruitment documents, it is known that worker recruitment is based on expertise, ability and records of medical examination results. The unit of certification has a non-discrimination and equal opportunity policy as indicated in the Decree of the Board of Directors Number 011.A/Sustainability-FR/P/VI/2022 regarding of equal employment opportunity policy. The unit of certification also shows a workforce register document for the December 2022 period which contains demographic information for all workers at PT SAM and PT ATS, namely workers who come from various regions, religions, ages, etc. Then from the results of interviews with harvest workers at the Afdeling 3, Petapahan 1 Estate, it is stated that the unit of certification does not practice recruitment fees and retention of identity documents during the recruitment process.

Based on the results of interviews with workers, Labor union and gender committee representatives, information was obtained that there were no issues related to discrimination. PT SAM and PT ATS workers come from various regions. Both local and migrant workers are given the same opportunity to get a job and promotion as well. The unit of certification also does not retain identity documents during the worker recruitment process.

6.1.3

The unit of certification does not discriminate against selection, recruitment, training and promotion. This is based on the skills, abilities, quality and medical eligibility of the workers. For example, in terms of worker promotion, the certification unit conducts a performance appraisal/evaluation before promoting workers to the newest status/position/class. For example, decree number GM/SK-INT/06/III/2020 regarding the appointment of an employee with the initials AP dated April 1st, 2020. The worker was appointed as a permanent daily employee after undergoing a 3-month probationary period as a loading ramp officer at the mill unit.

Based on the results of interviews with HR Staff, information was obtained that the recruitment process for all employees was carried out through the same process where prospective employees must meet requirements in the form of administrative selection (application letter, graduation letter, photocopy of personal and family identity), psychological test (for certain positions), interviews and results of medical examinations. To increase the career path, responsibility, authority and scope of an employee, the certification unit provides promotions based on skills, abilities, leadership, honesty, discipline, loyalty, attendance, etc. Employee performance appraisal is carried out through the stages of performance evaluation.

6.1.4

Pregnancy tests for workers are carried out only to ensure that pregnant workers are not allowed to work with chemicals, not as a basis for discriminating against these workers. If declared pregnant, the worker will be transferred to a job that is safer but remains the same in terms of wages and other benefits, so there is no discriminatory action. This was clarified by the results of interviews with female spray workers and representatives of the gender committee at PT SAM and PT ATS, which stated that female workers are required to carry out monthly pregnancy tests at the clinic to ensure that no pregnant/breastfeeding female workers are exposed to chemical material. Pregnancy testing is not a discriminatory measure provided by the unit of certification.

Then from the results of a review of the latest employee recruitment documents and interviews with female workers, it was found that there was no obligation for prospective female workers to take a pregnancy test when recruiting workers. They explained that at the time of recruitment, there was no pregnancy test, but only physical health tests, administration and interviews with prospective leaders.

6.1.5

The unit of certification has established a gender committee in each unit which has functions including gender equality, protection of women's rights, protection from incidents of harassment, and others. Furthermore, the certification unit shows documents establishing the Organizational Structure of the Gender Committee in each company for the 2023 – 2025 period consisting of representatives of each gender, namely men and women. The organizational structure consists of a Chairperson, Counselling Coordinator, Training Coordinator, Women's Rights Coordinator and Gender Equality Coordinator.

Gender committee work program in 2023 – 2025 for each company PT SAM and PT ATS including regular meetings of the gender committee management, socialization of women workers' rights, socialization related to gender equality, socialization regarding the flow of complaint and socialization and recording of sexual harassment/violence.

The unit of certification shows the realization of the program and the results of the gender committee meeting listed in the work program document and the realization of the gender committee in 2022, for example as follows:

- PT SAM: The regular meeting of the management of the gender committee was held on January 4th, 2023, whose agenda discussed work program to be implemented in the coming period. The activity was attended by 16 gender committee officials and women workers.
- PT ATS: The regular meeting of the management of the gender committee was held on December 19th, 2022, whose agenda discussed work program to be implemented in the coming period. The activity was attended by general managers, mill managers, heads of administration, gender committee officials and workers' representatives in each Afdeling estate and mill.

Based on interviews with workers in the plantation and factory units, both female and male gender, it is known that some workers are familiar with the functions, work programs, and mechanisms for submitting complaints through the gender committee. They added information that socialization regarding the gender committee was still being carried out in stages and in its entirety to workers at PT SAM and PT ATS.

6.1.6

Payment of fair wages has been properly carried out by the unit of certification, taking into account ability, performance, expertise, tenure, and other factors as the basis for remuneration. So that the payment of wages given is in accordance with the burden, duties and type of work of each. Payment of employee wages in this case refers to government regulations for employees with a tenure of less than one year and the structure of the wage scale that has been determined by the certification unit for workers with a service period of more than one year.

Based on the verification document of the structure of wage scale, salary slip for workers and results of interviews with HR staff, it is known that the wages paid by the certification unit have referred to the Decree of the Governor of Riau number Kpts1783/XII/2022 with the lowest basic salary of IDR 3,300,258.2. The structure of wage scale is differentiated based on worker status, namely *KHT* and *PBT*. For workers with *KHT* status, they are divided into four groups, namely groups A11, A12, A21 and A22 with 12 grades. The lowest wage earned was in group A11-grade 1, namely IDR 3,300,259 and the highest wage was in group A22-grade 12, namely IDR 3,335,759. Meanwhile, workers with *PBT* status are also divided into four groups, namely groups B11, B12, B21 and B22 with 12 grades. The lowest wage earner is in group B11-grade 1, which is IDR 3,350,259 and the highest wage is in group B22-grade 12, which is IDR 3,385,759.

Based on interviews with estate and mill workers with the same status show that the certification unit has paid employees wages according to the class and status of the employees. It was further explained that each employee had an understanding regarding the classification, assessment and tenure of employees that had been determined by the certification unit.

From the description above, it can be concluded that the company already has proof of payment of equal wages for the same scope of work.

Status: Comply

6.2

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

6.2.1

The unit of certification has documented procedures/policies related to wages and work requirements in accordance with employment provisions that have been published in the national language (Indonesian) listed in several documents, namely:

- Payroll administration SOP number HRD-KFU-02 revision 01 dated March 4th, 2011, which has been approved by the CEO. Based on interviews with management representatives, it is known that the procedure is still valid and there has been no change.
- Collective Labor Agreement PT SAM and PT ATS period of 2021 – 2023. The document explains the procedures for wages and things that can be calculated with wages (penalty, overtime, premium, etc.).
- Decree of the Governor of Riau number Kpts.1272/XI/2021 which took effect on January 1st, 2022, concerning the 2022 Kampar District Minimum Wage of IDR 3,047,470.58.
- Circular letter regarding the provisions on workers' wages for 2022 number 02.0.4/SE/011/XII/2021 issued on December 10th, 2021, which was signed by the Managing Director. The letter explained that wages for workers with less than one year of service were IDR 3,047,470 per month or IDR 121,899 per day. Meanwhile, workers with more than one year of service (*KHT* or *PBT* status) will be adjusted to the wage scale structure.

- Decree of the Governor of Riau number Kpts1783/XII/202 which took effect on January 1st, 2023, concerning the 2023 Kampar District Minimum Wage of IDR 3,300,258.2.
- Circular letter regarding the provisions on workers' wages for 2023 number 02.0.4/SE/19/XII/2022 issued on December 29th, 2022, which was signed by the Managing Director. The letter explained that wages for workers with less than one year of service were IDR 3,300,258.26 per month or IDR 132,011 per day. Meanwhile, workers with more than one year of service (*KHT* or *PBT* status) will be adjusted to the wage scale structure.

The unit of certification can show documentation of payment of wages for all workers shown in the payroll and payslips which include components such as basic wages, premiums, overtime, benefits (BPJS, electricity subsidies, etc.), and deductions (BPJS, loans, SPSI, cooperatives, etc.). Based on the results of the interviews, workers can explain their basic wages and allowances as well as the deductions they receive each month. Following are some examples of wage documents for workers during December 2022, including:

- A harvest worker with the initials DAT (*KHT*) receives a basic wage for December 2022 that is in accordance with the applicable UMK, namely IDR 3,047,470.
- A boiler operator with the initials HMZ (*PBT*) receives a basic wage for December 2022 that is in accordance with the structure of wage scale, namely IDR 3,057,470.

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

6.2.2

The unit of certification can show examples of work agreement documents, for example as follows:

- A permanent daily work agreement letter number 02.0.4/SPK/HRD/074.A/VIII/2022 for the harvest worker with the initials DAT at the Senamanenek Estate which was signed by both parties, namely the worker and the management representative on August 31st, 2022.
- A permanent daily work agreement letter number SNM/PKWTT/02/III/2020 for loading ramp operator with the initials AP in the mill unit which was signed by both parties, namely the worker and the management representative on March 1st, 2020.

As for the work agreement document shown, it contains information including the name acting as management representative and company address, employee information in the form of name and other personal information, employee position, employee work location, reporting, work duties and responsibilities, work agreement period, probationary period, salary and other benefits. The work agreement document has been signed by representatives of management and workers.

As a form of implementing the work agreement letter, the unit of certification shows the December 2022 payroll documents. For example, a harvest worker with the initials DAT receives a basic wage for December 2022 that is in accordance with the applicable UMK, namely IDR 3,047,470 plus a harvest premium of IDR 1,413,245.

Work agreements along with related documents detailing wages and working conditions (working hours, deductions, overtime, sick leave, leave, maternity leave, etc.) have been set forth in the Collective Labor Agreement document for the period 2021 – 2023. For example, in section V regarding the working time provisions, it is explained about working time, working hours, work overtime, etc.

Based on the description above, it can be concluded that the unit of certification has a work agreement along with related documents that stipulate detailed wages and work conditions.

6.2.3

The unit of certification shows evidence of legal compliance regarding the fulfillment of labor rights to workers, for example:

- Defined and agreed working hours are 7 hours a day and 40 hours a week. If there are excess working hours, overtime is paid. For example:
 - Loading ramp operator pay slip document with the initials AP (*KHT*) who receive a basic salary overtime pay of IDR 3,052,470 and overtime pay of IDR 1,243,926 in December 2022 for a total of 39 hours of overtime and the value of one hour overtime pay is IDR 17,644. Workers have signed an overtime order agreed by both parties (worker and certification unit representative) before carrying out overtime work.
 - Boiler operators pay slip document with the initials HMZ (*PBT*) who receive a basic salary overtime pay of IDR 3,057,470 and

overtime pay of IDR 1,661,284 in December 2022 for a total of 51.5 hours of overtime and the value of one hour overtime pay is IDR 17,644. Workers have signed an overtime order agreed by both parties (worker and certification unit representative) before carrying out overtime work.

- Every worker also has the right to annual leave of 12 days in one year. Specifically for female workers, the unit of certification grants the right to 2 days of menstrual leave and 1.5 month of maternity leave before and after giving birth.
- Based on the results of a review of the estate premium reference list document and interviews with management representatives, it is known that workers who are unable to attend without reason will receive a one working day wage deduction or IDR 132,011 (referring to the 2023 minimum wage). Apart from that, there are also deductions due to work negligence, for example, a harvester who harvest unripe fruit is IDR 5,000 that will be deducted from the premium.

It can be concluded that the implementation of working hours, minimum wages, overtime wages, leave entitlements, and others is in accordance with the provisions of applicable labor laws.

6.2.4

The certification unit has a list of worker welfare infrastructure facilities updated for year 2022, where there are employees' housing, religious facilities (houses of worship), sports facilities, health facilities (clinic), clean water facilities, electricity in the form the generator, daycare, school buses and others. Currently, all welfare facilities provided in general are in proper condition and can be used by workers and their families. The document also includes monitoring of the condition of public facilities for the 2022 period which explains that the current condition of worker welfare facilities is in good condition.

Based on the results of field visits to PT ATS's Afdeling 2 employee housing area, PT SAM's Afdeling 1, 7 and 8 employee housing area and based on interviews with 8 housing residents, it was found that 3 out of 8 workers' houses were in damaged condition, such as leaking roofs, perforated ceilings and no closets. In the bathroom. In addition, it is also known that the majority of the houses in employee housing are semi-permanent type houses (concrete and wooden planks), but some are already permanent houses (full concrete).

Based on the results of interviews with management representatives, it is known that the company has plans to renovate the damage and build permanent housing for employees. This is in line with the review of the Resume Meeting document on the findings and decisions related to Modern Slavery on 19 September 2022. The document explains the region's commitment to make improvements to facilities and infrastructure along with the timeframe. The company also shows a damage repair budget that will be implemented from March – December 2023 for PT ATS and August 2022 – May 2023 for PT SAM.

The company has the opportunity to ensure the realization of proper repairs and construction of permanent housing for the welfare of employees. **OFl.**

6.2.5

Based on the results of field visits to employee housing, it was discovered that some of the occupants of the housing in employee housing opened businesses to buy and sell staples and goods for daily needs.

Then, from the results of interviews with workers in plantations and factories as well as residents of houses in employee housing, it is known that they do not experience difficulties in obtaining food sources because the location of the estate and mill is also close to traditional markets and villages, so access to food and daily needs is very easy for workers to reach.

6.2.6

Currently the company uses wage calculations based on the 2022 Ketapang District Minimum Wage in accordance with the Riau Governor's Decree Number Kpts.1272/XI/2021 which was stipulated on November 30th, 2021, regarding the minimum wage in Kampar Regency in 2022 of IDR 3,047,470.58. This decree of minimum wage also included in DLW calculation established by the company. The DLW calculation is refers to the actual and rational price around the certification unit location.

The calculation of applicable wages & other benefits independently is shown in the Prevailing Wages Assessment for Senamanenek Estate and Petapahan Estate in 2022 which has been approved by the Sustainability. Wages apply as basic wages, allowances such as meal allowance, housing allowance, employee bonus, education allowance, housing facilities, health services, childcare and entertainment. The prevailing wage calculation that applies varies depending on the location of the estate, for example for a Senamanenek Estate (PT SAM) of IDR 4,245,814 and Petapahan 1 and 2 Estate (PT ATS) of IDR 4,459,437.

6.2.7

Based on the results of a review of employment documents and workforce lists for the period December 2022, it is known that currently companies no longer have workers with contract status such as *PKWT* and *PHL*. Currently all workers working in the company are permanent workers (*KHT*, *PBT* and Staff). This is also consistent with the results of interviews with plantation workers (harvesters, sprayers and fertilizers) and factories (processing operators, mechanics and security) which state that currently all workers are permanent workers and there are no workers with *PKWT* or *PHL* status anymore.

Status: Comply

6.3

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

6.3.1

The unit of certification has a policy on freedom of association listed in the Human Rights Policy dated March 15th, 2015, which was signed by the Managing Director. The policy explains the unit's commitment to giving freedom to workers to form collective bargaining and join labor unions.

As a form of implementation of this policy, the certification unit has a labor union as a forum for workers to convey their complaints or aspirations to the certification unit. Based on the results of interviews with workers and management representatives, it is known that workers do not yet have the desire to form a trade union. So that with the Labor union in the company it is felt that it is sufficient to accommodate complaints or aspirations from workers. The following is the founding document of the Labor union listed in:

- Proof of registration of labor union PT ATS-1 (Petapahan 1 Estate) at the Manpower and Transmigration Office at Kampar Regency with registration number 251/STK-TK/2007/1980 on September 27th, 2007.
- Approval of the composition and personnel of the labor union at PT ATS-2 (Petapahan 2 Estate) with number Kep.05-SK/PC.FSPPP-SPSI/KPR/V/2021 dated May 3rd, 2021. The document describes the new of labor union management for the 2021 – 2026 period.
- Approval of the composition and personnel of the labor union at PT SAM (Senamanenek Estate) with number Kep.017-SK/PC.FSPPP-SPSI/KPR/IX/2022 dated September 9th, 2022. The document describes the new of labor union management for the 2021 – 2026 period.

6.3.2

The unit of certification also has records of labor union meetings. The following is an example of meeting notes held by labor union in 2022, namely:

- Minutes of meeting labor union and management representative of PT SAM, which was held on November 23rd, 2022, and was attended by 14 participants. One of the agenda items for the meeting was a discussion on the formation of a new gender committee management structure.
- Minutes of meeting labor union and management representative of PT ATS, which was held on December 19th, 2022, and was attended by 12 participants. One of the agendas of this meeting was to discuss employee year-end leave arrangements.

Based on the results of interviews with labor union representatives and their members who are workers in each unit, it is known that the labor union holds meetings every month with those accommodated in meetings between worker representatives and management representatives and until now there has been issue that exists has been resolved by deliberation in the bipartite meeting which is held every month. This is also supported by the results of a review of worker complaint documents, it is known that the existing issues are only complaints related to damage and a lack of supporting facilities, but this has also been continuously improved by the company to be better.

6.3.3

Based on verification of the organizational structure of the trade unions in each plantation and factory unit, it was found that the union officials in all plantations and factories were not representatives of company management/staff. Then based on the results of interviews with trade union representatives and union members, it is known that there is no intervention from the unit of certification in selecting or organizing trade union activities. This is in line with the Human Rights Policy dated March 15th, 2015, which was signed by the Managing Director. It is stated that the unit of certification gives workers the freedom to organize and will not interfere with the activities of workers' organizations or trade union representatives.

Based on the results of interviews with workers, it is known that the company has given them the freedom to form and join trade unions. Then, union membership is voluntary without coercion.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1

The certification unit has a policy prohibiting the employment of minors contained in the:

- Decree of the Board of Directors Number 018/Sustainability_FR/P/03/2015 regarding of human rights and policy dated March 15th, 2015, which was signed by Managing Director.
- Decree of the Board of Directors Number 011.B/Sustainability_FR/P/VI/2022 regarding of child labor policy.
- Sustainable Palm Oil Policy dated July 1st, 2015, which was signed by CEO.

As this policy is known, the company prohibits the employment of children and will take action to prevent the use of child labor in all line of operations activities. This policy also applies and is required to be obeyed by plasma farmers, contractors and other stakeholders who have partnership relationships or active in operations and transactions within the company. The policies related to the prohibition of child labor as stated in the work agreement between the plasma smallholders/contractors and the company. In addition, the company also conducts socialization on a regular basis.

Based on the employee list for the December 2022 period, it is known that none of the employees were younger than 18 years old when they first started working. For example, a harvest worker with the initial OPL born in 2004 who was accepted to work on January 1st, 2023. At the time of the recruitment process, the worker is over 18 years of age.

Based on the results of interviews with workers in each estate and mill unit, representatives of the labor union and security service provider contractors, information was obtained that there had never been any issues regarding child labour. In addition, around the company area there are warnings informing the prohibition for children to be in the work location.

6.4.2

The unit of certification shows the employee list documents period December 2022 for estate and mill units of PT SAM and PT ATS where there are no children under the age of 18 who are employed. In addition, the company has also shown document SOP of Recruitment and Selection number FR.CHR.R&S.002 revision 1 dated November 1st, 2012, which has been approved by VP HR. The SOP explains that in the labor recruitment process, the unit of certification does not accept prospective workers who are under 18 years of age. This is in line with job vacancy information documents which states the requirements for prospective workers who must be ≥ 18 years old.

Based on the interview with HR staff, it was explained that in the employee recruitment process an age screening will be carried out before going through an identity check (*KTP* or Birth Certificate) to ensure that the age requirements of workers are met and not violated.

6.4.3

Based on a review of the employee list document, the list of students who took part in field work practices and the results of interviews with management representatives, information was obtained that there were no young workers and students who carried out field work practices in the company's operational areas.

Based on the results of interviews with trade union representatives and management representatives, it is known that if there are students who do practical work in the field, they will be placed in non-hazardous jobs or as observers of plantation and factory activities. Because the goal is only to meet the needs of fulfilling the learning curriculum.

6.4.4

Socialization regarding child protection policies and the prohibition of child labor has been carried out in each estate and mill unit. For example:

- Socialization at the Senamanenek Estate of PT SAM on December 5th, 2022,
- Petapahan 1 Estate of PT ATS on December 15th, 2022,
- And to stakeholders (contractor workers and surrounding communities) at the signing the work contract or morning briefing before

starting work.

Based on the results of interviews with workers in estate and factory units, internal stakeholders such as representatives of labor unions and external stakeholders for example security service provider contractor (PT Pagar Negeri) and the surrounding Village community (Danau Lancang Village), it is known that all parties understand child protection and the prohibition of child labor. Then, based on the results of field observations in the plantation and factory areas, it is known that the company has a warning regarding the prohibition of child labor and the prohibition of children being in the company's operational areas.

Status: Comply

6.5

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

6.5.1

The company already has a policy to ensure that workers are free from all forms of harassment, threats, persecution as stated in the:

- Decree of the Board of Directors Number 018/Sustainability_FR/P/03/2015 regarding of human rights and policy dated March 15th, 2015, which was signed by Managing Director.
- Decree of the Board of Directors Number 011.C/Sustainability_FR/P/VI/2022 regarding of sexual harassment policy.
- Sustainable Palm Oil Policy dated July 1st, 2015, which was signed by CEO.

To ensure that this policy is implemented, the company has a reporting mechanism in place when workplace harassment occurs. This policy also applies and must be complied with by smallholders, contractors and other stakeholders who have partnership relationships or are active in operations and transactions within the company. Then, the company routinely conducts outreach to workers and other stakeholders, for example on December 13th, 2022, at Petapahan 2 Estate of PT ATS. This is in line with the results of interviews with workers and internal/external stakeholder, who already know the flow of complaints if they do experience incidents of harassment at work.

Based on the results of interviews with workers, information was obtained that workers can submit complaints through their direct superiors or through the gender committee. In addition, over the past year there have been no cases of sexual harassment. This is supported by the absence of complaints regarding sexual harassment in the minutes of meetings of the gender committee in all plantation and factory units during 2022.

6.5.2

The company has a policy related to the protection of reproductive rights in female workers such as menstruation or pregnant/new mothers listed in the:

- Decree of the Board of Directors Number 018/Sustainability_FR/P/03/2015 regarding of human rights and policy dated March 15th, 2015, which was signed by Managing Director.
- Decree of the Board of Directors Number 011.D/Sustainability_FR/P/VI/2022 regarding of protection of reproductive right policy.
- Sustainable Palm Oil Policy dated July 1st, 2015, which was signed by CEO.

The document explains the policy on women's reproductive rights which refers to the provisions of the Labor Law number 13 of 2003, namely if there are female workers who are menstruating, feel sick and based on a doctor's examination, they are not obliged to work on the first and second days of menstruation. Then, if there are workers who give birth, these workers will get leave for 90 days before and after giving birth. Evidence of the implementation of this policy is listed in the 2022 menstruation leave and maternity leave recapitulation document.

Based on the results of interviews with management representative and woman workers, information was obtained that female workers have the right to leave for menstruation and maternity leave. The mechanism for granting menstruation leave is carried out by means of a preliminary examination at the clinic by the company doctor. In addition, the source also stated that pregnant and new-born women workers should not do spraying work or other work that is directly related to chemical management.

6.5.3

The unit of certification has identified and carried out activities related to assessing the needs of new mothers which are carried out based on a survey of each female worker and/or the wife of the worker. The document explains the list of needs and facilities for new mothers, for example providing classes for pregnant women and classes for babies at integrated healthcare centre activities, rooms for breastfeeding, etc.

Based on the results of interviews with management representative and woman workers, information was obtained that new mothers

were given special rest periods so they could breastfeed their children, pre- and post-natal health check-up facilities at integrated healthcare centre activities and were kept away from jobs that used chemicals during pregnancy or just giving birth.

6.5.4

The unit of certification has Communication SOP Number FR.EMS.CIE Revision 2 issued November 22nd, 2018, which has been approved by the CEO. This documents it is explained that the unit of certification guarantees the anonymity of the reporter with the aim of protecting human rights defenders. The procedure explains that the steps for submitting complaints verbally and/or in writing are addressed to the management leadership. The maximum response to responding to a complaint is one month from the receipt of the complaint.

These procedures and policies have been socialized in each plantation and factory unit, for example socialization at the Petapahan 2 Estate of PT ATS on December 13th, 2022. In addition, based on the results of interviews with day care officers and spray worker at Petapahan 1 Estate, it was stated that complaints could be submitted to the direct supervisor, labor union or the gender committee (specific complaints on women's issues) and the identity of the complainant would be kept confidential. This aims to provide space for all workers or stakeholders to be able to submit complaints comfortably if there are practices that are not in accordance with the ethical practice policy.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1

The unit of certification shows the Decree of the Board of Directors Number 018/Sustainability_FR/P/03/2015 regarding of human rights and policy dated March 15th, 2015, which was signed by Managing Director and the Sustainable Palm Oil Policy dated July 1st, 2015, which was signed by CEO. The document states that the company is committed to preventing the practice of forced labor or slavery and not using workers who are the result of human trafficking in all operational activities. This policy has been socialized to workers in each plantation and factory unit, for example, socialization at the Petapahan 1 Estate of PT ATS on December 15th, 2022, and to stakeholders (contractor workers and surrounding communities) at the signing the work contract. This policy also applies and is required to be obeyed by plasma farmers, contractors and other stakeholders who have partnership relationships or active in operations and transactions within the company.

Then, based on the results of the studies of employment documents and the results of interviews with workers in plantation units and factories as well as representatives of labor union, the following information was obtained:

- There is no validation of identity documents and payment of fees during the worker recruitment process.
- There is no act of forced labor carried out by the company. In one day, workers work for 7 hours. The unit of certification sets work targets that can be obtained in less than 7 working hours. If the worker works more than 7 hours or gets the work target exceeded, the company will pay the ox/premium wages in excess of the work target.
- Overtime work is carried out based on the agreement of both parties, both workers and company management representatives. If workers carry out overtime work, workers always sign an overtime order.
- Workers have rights and freedoms if they want to resign from the company.
- Payment of wages to workers is never late. Salary is given on the 15th of every month.

6.6.2

Based on the results of a review of the employee list document for the period December 2022, it is known that there is no use of foreign workers at PT SAM and PT ATS. The workforce in the company includes permanent workers (*KHT* and *PBT*) and staff who come from Indonesia. Then from the results of interviews with representatives of the *Labor union* and company representatives, it is known that there are no foreign workers in the company. The resource person also added information that all procedures related to human resource management have been implemented in the company's operational areas. Each worker has a work agreement that describes a specific job description and there is no replacement of the contract without prior consultation and approval of the worker.

Status: Comply

6.7

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

6.7.1

The CH has a person in charge of OHS according to the OHS Committee structure which consists of 2 Company, namely PT. SAM includes the SAM POM, SAM Estate and PT. ATS includes Petapahan-1 Estate and Petapahan-2 Estate units. The OHS Committee

structure is at PT. SAM and PT. ATS, namely:

- **Structure of OHS Committee PT. SAM**
The OHS Committee structure is based on the Decree of the Regent of Ketapang No. 52/Disnakertrans-PK/SK-P2K3/II/2023 on 01 February 2023. The OHS Committee structure consists of a supervisor by a Estate Group Manager, Factory Manager, Secretary, Deputy Secretary, Evaluation Division, Supervision Division, Division Research, Emergency Response Team, Training/Counselling Sector, and Health Sector. The organizational structure has not changed so that it is still valid today. OHS Committee Secretary Anggiat Jumadi is General OHS expert with training certificate no. Ser.18.27513/AK3/U/XII/2018 dated 31 December 2018. General OHS expert appointment from the Indonesian Ministry of Manpower No. 5/7408/AS.01.03/VI/2022 dated 30 June 2022 and OHS expert authority card license No. 63227/PK3/AJ/14/2022/P1 valid until 30 June 2025.
- **Structure of OHS Committee PT. ATS**
The OHS Committee structure is based on the Decree of the Regent of Ketapang No. 409/Disnakertrans-PK/SK-P2K3/IX/2021 dated 17 November 2021. The OHS Committee structure consists of a supervisor by a Estate Group Manager, Estate Manager, Secretary, Deputy Secretary, Evaluation Division, Monitoring Division, Division Research, Emergency Response Team, Training/Counselling Sector, and Health Sector. The organizational structure has not changed so that it is still valid today. OHS Committee Secretary Hardian is General OHS Expert with training certificate no. Ser.17.1977/AK3/U/IV/2017 dated 3 April 2017. General OHS Expert designation from the Indonesian Ministry of Manpower No. 5/133/AS.02.04/II/2020 dated 15 January 2020 and OHS expert authority card license No. 38011/PK3/AJ/21/2020/P1 is valid until January 15, 2023. The company has carried out the process of renewing the AK3U PT license. The ATS was dated 3 February 2021 at the Riau Province Manpower Agency.

The company has held regular meetings between OHS Committee management of PT. SAM with employees is conducted every month. For example, there are regular monthly meetings including a meeting on December 30th, 2022, which was attended by all staff, the head of OHS Committee, the secretary of OHS Committee, PIC Sustainability and all 8 estate managers. In the meeting discussed several things including discussing the OHS Committee work program of PT. SAM, December 2022 work program implementation, reports from each OHS Committee team, accident reports and analysis, recommendations, discussion results and activities for the coming month.

In addition, the company has held regular meetings between OHS Committee management of PT. ATS with employees which is carried out every month. For example, there are regular monthly meetings including a meeting on December 30, 2022, which was attended by all staff, the Head of OHS Committee, the secretary of OHS Committee, PIC Sustainability and all 9 estate managers. In the meeting discussed several things including discussing the OHS Committee work program of PT. ATS, December 2022 work program implementation, reports from each OHS Committee team, accident reports and analysis, recommendations, discussion results and activities for the coming month.

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

6.7.2

The CH already has procedures for handling emergency response and work accidents in SOP No. FR.OSH.P12 concerning Handling of Occupational Accidents and Near Misses which was approved by the CEO on September 1, 2011. The procedure regulates several matters, including those related to first aid training in accidents, accident handling, handling occupational diseases, handling in the event of a mass accident, further handling of victims who experience serious accidents, reporting and investigation of work accidents. In addition, there is SOP No. FR.OSH.P10 concerning Emergency and Responsibility Management which was approved by the CEO on September 1, 2011. This procedure regulates general understanding, handling plans, work programs, special procedures and procedures for testing emergency response teams and their equipment.

Based on the results of field observations at Sam Mill, SAM Estate, Petapahan-1 Estate and Petapahan Estate-2, there were first aid workers equipped with 21 types of first aid kits. There is only 1 first aid worker who has been certified; this is a non-conformity in indicator 3.6.2 because the ratio of first aid workers who have been trained does not match the number of existing workers. The company only conducts internal training related to the first handling of work accidents carried out by company doctors, including first aid and HIRAC Socialization training on December 13, 2022, which was attended by 17 employees from PT SAM.

The company also has first aid kits which are always brought to the field by all Plantation Foremen. First aid kits are also placed in factories and estate, including estate offices, division offices, chemical warehouses, fertilizer warehouses, clinics, hazardous toxic and waste, factory offices, sorting stations, weighing stations, boiler stations, power supply stations, workshops and others. The appointed first aid worker can also demonstrate the use of first aid kit equipment in the field.

The company also shows work accident records for the January-December 2022 period, namely 10 work accidents at SAM Estate, 5 work accidents at Petapahan-1 Estate and 12 work accidents at Petapahan-II Estate. The company has evaluated all OHS plans and their realization every month and reports them to the Manpower and Transmigration Office every quarter.

Based on the description above, it shows that the company has emergency response procedures and work accidents that are clearly understood by all workers, there are workers assigned to the field and other work locations and have received First Aid in Accident training, first aid kits are available in the workplace and have records of all work accidents kept and regularly reviewed.

6.7.3

The CH has procedures related to PPE in SOP for Personal Protective Equipment (PPE) No. PR.FR.COP.OPA.APD which was approved by the CEO on 1 October 2019. This procedure regulates company policies, PPE management guidelines, types of PPE, and types of PPE in operational activities.

Based on the results of field observations at SAM Mill, SAM Estate, Petapahan-1 Estate and Petapahan-2 Estate, all workers have used PPE according to their respective potential hazards, for example spray workers have used complete PPE in the form of helmets equipped with face shields, respirator masks, apron, rubber gloves and boots. All workers use clean clothes from home and change them at the rinse house to use work clothes complete with PPE provided by the company. After the spray job is complete, all workers shower at home, rinse, change into clean clothes and return home clean. The rinse house has provided a rinse room for spray employees, emergency facilities in the form of an eye washer, fire extinguisher, a place to store PPE and spray equipment.

There are minutes of PPE handover events at factories and plantations, including:

- On December 31, 2022, handover of PPE in the form of helmets, safety shoes, gloves, ear muffs/plugs, masks, goggles, aprons, and *egrek* gloves to 28 factory employees
- On December 24, 2022, handover of PPE in the form of helmets, safety shoes, gloves, ear muffs/plugs, masks, goggles, aprons, and *egrek* gloves to 36 harvesters in Afdeling 3 Petapahan 2 Estate.
- On December 25, 2022, handover of PPE in the form of helmets, safety shoes, gloves, ear muffs/plugs, masks, goggles, aprons, and *egrek* gloves to 48 harvesters in Afdeling 1 Petapahan 2 Estate.

Based on interviews with harvest workers at SAM Estate, Petapahan-1 Estate and Petapahan-2 Estate, it is known that all harvesters receive PPE free of charge.

Based on the description above, it shows that workers have used appropriate Personal Protective Equipment (PPE) and are provided free of charge to all workers at the workplace, and sanitation facilities are available for workers who use pesticides so that workers can remove PPE, clean themselves and put on their personal clothes.

6.7.4

The certification unit already has a list of workers which also includes *BPJS Ketenagakerjaan* participant numbers for all workers in each estate and mill unit. As one example, based on a review of the December 2022 worker list document and proof of payment for *BPJS Ketenagakerjaan* for the same period, it is known that companies have registered and paid all their workers in the *BPJS Ketenagakerjaan* program, which consists of work accident insurance, death benefit, old age benefit and pension benefit via bank transfer with details as follows:

- PT SAM (Subur Arum Makmur Mill)
 - The list of workers in the SAM Mill for the period of December 2022 is 112 workers.
 - Proof of payment for *BPJS Ketenagakerjaan* for the December 2022 period for a total of 112 workers on January 13th, 2023.
 - Proof of payment *BPJS Kesehatan* for the December 2022 period for a total 112 workers on December 9th, 2022.
- PT SAM (Senamanenek Estate)
 - The list of workers in the Senamanenek Estate for the period of December 2022 is 530 workers.
 - Proof of payment for *BPJS Ketenagakerjaan* for the December 2022 period for a total of 530 workers on January 13th, 2023
 - Proof of payment *BPJS Kesehatan* for the December 2022 period for a total 530 on December 9th, 2022.
- PT ATS (Petapahan 1 and 2 Estate)
 - The list of workers in the PT ATS for the period of December 2022 is 389 workers.
 - Proof of payment for *BPJS Ketenagakerjaan* for the December 2022 period for a total of 389 workers on January 13th, 2023.
 - Proof of payment *BPJS Kesehatan* for the December 2022 period for a total 389 workers on December 9th, 2022.

Based on the results of interviews with plantation and factory workers, it is known that the company has provided employment guarantees to all workers and health insurance to workers and their families (wife and children). The workers have held the *BPJS* card and know the registration number. The worker also added information that the *BPJS Kesehatan* card can be used for treatment when a family member is sick.

In the past year there have been minor work accidents such as being pricked by a thorn in the fruit or palm oil leave, being exposed to palm fruit powder, being crushed by fruit, slipping, and other minor work accidents. All of these work accidents are only handled at the company clinic, so there are no costs arising from work accident incidents because the handling of work accidents at the company clinic is free of charge or free.

Based on the above, it can be concluded that the company has provided health services and protected all its workers with *BPJS Ketenagakerjaan* and *BPJS Kesehatan*.

6.7.5

The CH has recorded all work accidents and stored and reviewed periodically, including in the LTA 2022 report on the SAM Estate, Petapahan-1 Estate and Petapahan 2 Estate for the period January – December 2022 made by the Sustainability Staff . In the LTA table there are data on the number of employees, the number of working days, the number of working hours per day, the number of working hours in 1 month, the total working hours of employees, the total working hours, the number of work accidents that cause lost working days, the number of working days lost, the frequency rate and severity rate.

- **SAM Estate & SAM Mill**
In the period January-December 2022 SAM Estate & SAM Mill has 642 employees, total working hours a year are 1,337,070 hours and there are work accidents which cause 13 working days to be lost, so the FR value is 5.98 meaning there is a loss of working time of 5.98 hours per million people work, this figure shows workers who are not at work after work accidents. In addition, there is an SR value of 9.72, meaning that during 2022 there will be a loss of working time of 9.72 days per million hours worked.
- **Petapahan-1 Estate**
In the period January-December 2022 Petapahan-1 Estate has 214 employees, total working hours a year are 449,820 hours and there are work accidents which cause 8 working days to be lost, so the FR value is 8.89 meaning there is a loss of working time of 8.89 hours per million number of workers, this figure shows workers who are not at work after a work accident. In addition, there is an SR value of 17.78, meaning that during 2022 there will be a loss of working time of 17.78 days per million hours worked.
- **Petapahan-2 Estate**
In the period January-December 2022 Petapahan-1 Estate has 175 employees, total working hours a year are 368,676 hours and there are work accidents which cause 7 working days to be lost, so the FR value is 18.99 meaning there is a loss of working time of 18.99 hours per million number of workers, this figure shows workers who are not at work after a work accident. In addition, there is an SR value of 18.99 meaning that during 2022 there will be a loss of working time of 18.99 days per million hours worked.

Based on the description above, it shows that the unit of certification has recorded work accidents using the *Lost Time Accident (LTA)* format.

Status: Comply

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

7.1

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

7.1.1

The CH has SOP related to Pest and Disease Control No. MN.FR.COP.OPA.PHT dated 1 July 2012. In the SOP it is explained that to get good control results it is necessary to apply an Integrated Pest Management (IPM) system or called Integrated Pest Management (IPM). The presence of pests/diseases in the field must be verified early (early warning system).

The company has an IPM program through EWS, which is daily monitoring by special officers and will be followed up with a census if attacks with a severe category are found in these blocks. Control can be carried out using biological, chemical or mechanical techniques such as biological techniques using natural enemies such as owls or the use of beneficial plants *Turnera subulata* as a place to live for fire

caterpillar predators. Control with chemical techniques by applying pesticides to control pests and herbicides to control weeds.

- **UPDKS pests**

SAM Estate, Petapahan-1 Estate and Petapahan 2 Estate are developing *Beneficial Plants* including *Turnera Subulata* and *Antigonon leptopus* which are spread across the Division. As the results of field observations in Block G30 Division 1 SAM Estate, Block 84 Division 1 Petapahan-2 Estate there are *Turnera Subulata* and *Antigonon leptopus* which grows well. The results of the October 2022 UPDKS census found no fire caterpillar attacks, but there were *Mahasena corbetti* attacks at Petapahan-1 Estate. The bagworm pest attacks include:

- The results of the census on 25 November 2022 in Block A025 found 38.37 attacks per leaf. After the pesticide application was carried out on November 26, 2022, *Mahasena corbetti* pest attacks decreased to 4.51 heads per leaf.
- The results of the census on 28 November 2022 in Block A020 found 32.03 attacks per leaf. After the pesticide application was carried out on December 8, 2022, *Mahasena corbetti* pest attacks decreased to 4.22 heads per leaf.
- The results of the census on 5 December 2022 in Block A018 found 30.38 attacks per leaf. After the pesticide application was carried out on December 13, 2022, *Mahasena corbetti* pest attacks decreased to 3.83 heads per leaf.

The company stopped the pesticide application because the *Mahasena corbetti* attack was below the threshold of <5 individuals per leaf.

- **Rat Pests**

Rat pest control with baiting system. If the bait eaten is < 20% then the baiting campaign is stopped. Conversely, if the bait eaten is still above 20%, the baiting campaign is repeated. In addition, there is the development of *Tyto Alba* to help prevent and control rat pests, such as Gupon in Block Q21 Division 8 SAM Estate and Block 54 Division 2 Petapahan-2 Estate. In August 2022 at Petapahan-2 Estate there was a rat attack of 0.36% and at Petapahan-1 Estate there was a rat attack of 0.33%. Rat attack in 2022 is still below the 5% threshold so there is no control using pesticides.

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

7.1.2

Based on document review, interviews with the Estate Manager, and field observations at SAM Estate, Petapahan-1 Estate and Petapahan 2 Estate, there were no invasive species used for plant pest control. The company controls plant pests and diseases including using biological methods by developing *Beneficial Plants* in the form of *Turnera Subulata* and *Antigonon leptopus*, the predator *Tyto Alba* and these species are not invasive in Indonesia.

As for the spread of gupon, including:

- 330 Gupon in SAM1 Estate and active gupon of 236 gupon or 71.5%,
- 65 gupon in Petapahan-1 Estate and active gupon as many as 43 gupon or 66.15%,
- 150 Petapahan-2 Estate gupons and 131 active gupons or 87.3%

As for the distribution of *Beneficial Plants*, among others

- Petapahan-1 Estate embedded *Turnera Subulata* in Afdeling 1 Block A10 is 50 m long and in Afdeling 3 Block A42 is 100 m long
- Petapahan-2 Estate embedded *Turnera Subulata* in Afdeling 1 Block B67 is 50 m long and in Afdeling 3 Block B149 is 100 m long
- SAM Estate embedded *Turnera Subulata* in Afdeling 1 Block G32 is 50 m long and in Afdeling 5 Block N29 is 100 m long

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

7.1.3

As explained in indicator 7.1.1, the unit of certification in SAM Estate, Petapahan-1 Estate and Petapahan 2 Estate does not use fire to control pests and plant diseases. The company implements EWS with daily monitoring and conducts a census of plant pests and diseases if heavy attacks are found on these blocks. The company prioritizes the control of pests and plant diseases using biological methods, namely through the development of *beneficial plants*, including using the types *Turnera Subulata* and *Antigonon leptopus*. Based on the description above, it shows that the company does not use fire in controlling pests and plant diseases.

Status: Comply

7.2

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

7.2.1

The CH has procedures related to the use of pesticides, including policies related to the limited use of pesticides as stated in circular letter No. SAM/SE/02/X/2018 dated 01 October 2018 from GM PT. SAM and PT. ATS to all *Field Assistants*, Warehouse Heads and Maintenance Foremen, containing:

- As of January 1, 2019, pest and disease control activities are not allowed to use pesticides with a high level of danger (groups 1a and 1b on the WHO list), especially rat poisons with active brodifacoum and coumatetralyl and insecticides with active carbofuran ingredients.
- As of January 1, 2019, spraying weeds is not allowed to use pesticides with the active ingredient *Paraquat Dichlorida*
- As of October 1, 2018, the company no longer orders pesticides according to company regulations
- As of January 1, 2019, limited stocks of pesticides that have not been used should be sent to temporary storage Hazardous and Toxic materials.

The company also shows the procedure FR.CSM.OP.2 on 01 September 2011 regarding pesticide management. This SOP regulates the classes of pesticides used, procedures for preventing accidents due to poisoning, and protecting the environment by using pesticides responsibly. The SOP is a guide to ensure all maintenance activities during the Mature and Immature period so that company goals and environmental sustainability are achieved.

In the use of pesticides, not all areas are sprayed with pesticides, but the areas that are sprayed are discs, path and collection point. To determine the need for spray volume per hectare, the company calibrates the spray equipment, nozzles, and road speed so that the dosage and volume of the spray solution is correct and not excessive. The company has determined the pesticides used for weed control, for example the active ingredient *Glyphosate* to control Imperata, weeds, and the active ingredient *Methyl Metsulfuron* to control LCC, *stenochnaena*, and caladium.

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

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

7.2.2

The company has records of the use of pesticides (including the active ingredients used and the LD50 of the active ingredients, and the number of applications). Following are some of the realizations of pesticide application at SAM Estate:

ACTIVE INGREDIENTS	TRADEMARKS	SAT	LD50	TOCICITY/ Lt	2022	Distribution Permit	VALIDITY
<i>Isopropilamina Glyphosate</i>	Round Up	Lt	5,000	72	2,680	RI. 01030120134713	16 Apr 2023
	Bionasa	Lt	5,000	72	1668	RI. 01030120031806	Jan. 14, 2027
<i>Methyl Metsulfuron</i>	Metafuron 20WP	kg	8,000	26	450	RI. 01030119951224	22 Feb 2026
	Metsulindo	kg	5,000	40	-	RI. 01030119991484	22 Feb 2026
<i>Triclopyr Butoksi Etil Ester</i>	Garlon	Lt	1,581	304	2,893	RI. 0103011984695	16 Apr 2023
<i>Ammonium Glyfufonate</i>	Lifeline 280SL	Lt	2,000	128	12,272	RI. 01030120175849	05 Dec 2027

In addition, there is a record of the use of pesticides in Petapahan-1 Estate:

ACTIVE INGREDIENTS	TRADEMARKS	SAT	LD50	TOCICITY/ Lt	2022	Distribution Permit	VALIDITY
<i>Isopropilamina Glyphosate</i>	Round Up	Lt	5,000	72	1,560	RI. 01030120134713	16 Apr 2023
	Bionasa	Lt	5,000	72	4,940	RI. 01030120031806	Jan. 14, 2027
	Hawk	Lt	5,000	72	1,482	RI. 01030119941170	12 Oct 2026
<i>Methyl Metsulfuron</i>	Metafuron 20WP	kg	8,000	26	619	RI. 01030119951224	22 Feb 2026
	Metsulindo	kg	5,000	40	-	RI. 01030119991484	22 Feb 2026

<i>Triclopyr Butoksi Etil Ester</i>	Garlon	Lt	1,581	304	1,330	RI. 0103011984695	16 Apr 2023
	Biolon	Lt	2,733	176	810	RI. 01030120093412	Jan. 23, 2024
<i>Ammonium Glyfusonate</i>	Lifeline 280SL	Lt	2,000	128	6,053	RI. 01030120175849	05 Dec 2027
	Basta	Lt	1910	79	500	RI. 01030120175826	Jan. 14, 2027

The application of pesticides in Petapahan-2 Estate, including:

ACTIVE INGREDIENTS	TRADEMARKS	SAT	LD50	TOXICITY/ Lt	2022	Distribution Permit	VALIDITY
<i>Isopropilamina Glyphosate</i>	Round Up	Lt	5,000	72	1.019	RI. 01030120134713	16 Apr 2023
	Bionasa	Lt	5,000	72	2,654	RI. 01030120031806	Jan. 14, 2027
	Hawk	Lt	5,000	72	-	RI. 01030119941170	12 Oct 2026
<i>Methyl Metsulfuron</i>	Metafuron 20WP	kg	8,000	26	-	RI. 01030119951224	22 Feb 2026
	Metsulindo	kg	5,000	40	-	RI. 01030119991484	22 Feb 2026
<i>Triclopyr Butoksi Etil Ester</i>	Garlon	Lt	1,581	304	944	RI. 0103011984695	16 Apr 2023
	Biolon	Lt	2,733	176	220	RI. 01030120093412	Jan. 23, 2024
	Starlon	Lt	2,876	231	396	RI. 01030120072899	17 Apr 2023
<i>Ammonium Glyfusonate</i>	Lifeline 280SL	Lt	2,000	128	4,120	RI. 01030120175849	05 Dec 2027
	fascinate	Lt	2,000	75	200	RI. 01030120155299	05 Dec 2027

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

7.2.3

The company shows the use of pesticides in 2021-2022 at SAM Estate, Petapahan-1 Estate and Petapahan-2 Estate. The use of pesticides in SAM Estate, including:

ACTIVE INGREDIENTS	TRADEMARKS	SAT	2021	2022
<i>Isopropilamina Glyphosate</i>	Round Up	Lt	4,720	2,680
	Bionasa	Lt	2,872	1668
<i>Methyl Metsulfuron</i>	Metafuron 20WP	kg	352	450
	Metsulindo	kg	272	-
<i>Triclopyr Butoksi Etil Ester</i>	Garlon	Lt	2.112	2,893
<i>Ammonium Glyfusonate</i>	Lifeline 280SL	Lt	6,341	12,272

The use of pesticides in Petapahan-1 Estate, including:

ACTIVE INGREDIENTS	TRADEMARKS	SAT	2021	2022
<i>Isopropilamina Glyphosate</i>	Round Up	Lt	1,562	1,560
	Bionasa	Lt	5,257	4,940
	Hawk	Lt		1,482
<i>Methyl Metsulfuron</i>	Metafuron 20WP	kg	496	619
	Metsulindo	kg	346.35	-
<i>Triclopyr Butoksi Etil Ester</i>	Garlon	Lt	901	1,330
	Biolon	Lt	-	810
<i>Ammonium Glyfusonate</i>	Lifeline 280SL	Lt	4,360	6,053
	Basta	Lt	-	500

While the use of pesticides in Petapahan-2 Estate, including:

ACTIVE INGREDIENTS	TRADEMARKS	SAT	2021	2022
<i>Isopropilamina Glyphosate</i>	Round Up	Lt	1,081	1,019
	Bionasa	Lt	749	2,654
	Hawk	Lt	-	-
<i>Methyl Metsulfuron</i>	Metafuron 20WP	kg	10	-
	Metsulindo	kg	341	-
<i>Triclopyr Butoksi Etil Ester</i>	Garlon	Lt	383	944
	Biolon	Lt	-	220
	Starlon	Lt	-	396
<i>Ammonium Glyfusonate</i>	Lifeline 280SL	Lt	1,436	4,120
	fascinate	Lt		200

In general, the use of pesticides in 2022 will increase compared to 2021, due to an increase in the area of Immature in 2021 of 618.53 Ha and Immature in 2022 of 1,508.44. As the Immature area increases, weed growth and density also increases, requiring an increase in pesticide doses.

The use of *triclopyr* has also increased, this is due to the eradication of *kentosan* which grows as a result of replanting areas. In addition, there was an increase in *Ammonium Glyfusonate*, this was due to an increase in the area of TBM and not using *Glyphosate* because it was feared it could interfere with the growth of young plants.

However, since 2019, the company has not used *Paraquat Diclorida*, this is in accordance with company policy in circular letter No. SAM/SE/02/X/2018 dated 01 October 2018 from GM PT. SAM and PT. ATS to all *Field Assistants*, Warehouse Heads and Maintenance Foremen.

Based on the description above, it shows that the company already has a plan to use pesticides in accordance with the IPM plan.

7.2.4

The company has procedures FR.CSM.OP.2 on September 1, 2011, regarding pesticide management. This SOP regulates the classes of pesticides used, procedures for preventing accidents due to poisoning, and protecting the environment by using pesticides responsibly. The SOP is a guide to ensure all maintenance activities during the Mature and Immature period so that company goals and environmental sustainability are achieved.

In controlling plant pest, the company has several methods, including:

- Control is carried out based on detection and census results that exceed the economic threshold.
- Explanations regarding control can be carried out using biological, chemical or mechanical techniques such as biological techniques using natural enemies such as owls or the use of beneficial plants *Turnera subulata* as a place to live for fire caterpillar predators. Control with chemical techniques by applying pesticides to control termites and herbicides to control weeds. Mechanical control is also carried out, for example using a rotary slasher to control weeds at the path.
- Mice pest control with baiting system. If the bait eaten is < 20% then the baiting campaign is stopped. Conversely, if the bait eaten is still above 20%, the baiting campaign is repeated.

This census system includes the detection and counting of new attacks of pests and plant diseases which is carried out continuously throughout the plantation area, making it useful for monitoring the main pests of oil palm such as leaf pests (fire caterpillars and bagworms), rats, tiratabha, termites and diseases oil palm. Pest control is carried out if the census results show moderate to severe attack categories. In addition, Plant pest control prioritizes biological methods including the development of *Beneficial Plants of the Turnera Subulata* and *Antigonon leptopus* types.

For example, there are results of a census of bagworm attacks prior to the application of pesticides, as follows:

- The results of the census on 25 November 2022 in Block A025 found 38.37 attacks per leaf. After the pesticide application was carried out on November 26, 2022, bagworm pest attacks decreased to 4.51 heads per leaf
- The results of the census on 28 November 2022 in Block A20 found 32.03 attacks per leaf. After the pesticide application was carried out on December 8, 2022, bagworm pest attacks decreased to 4.22 heads per leaf

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

7.2.5

The CH has procedures related to the use of pesticides, including policies related to the limited use of pesticides as stated in circular letter No. SAM/SE/02/X/2018 dated 01 October 2018 from GM PT. SAM and PT. ATS to all *Field Assistants*, Warehouse Heads and Maintenance Foremen, containing:

- As of January 1, 2019, pest and disease control activities are not allowed to use pesticides with a high level of danger (groups 1a and 1b on the WHO list), especially rat poisons with active brodifacoum and coumatetralyl and insecticides with active carbofuran ingredients.
- As of January 1, 2019, spraying weeds is not allowed to use pesticides with the active ingredient *Paraquat Dichlorida*
- As of October 1, 2018, the company no longer orders pesticides according to company regulations
- As of January 1, 2019, limited stocks of pesticides that have not been used should be sent to hazardous toxic and waste storage.

Based on the results of interviews with the SAM Estate assistant, it is known that the garden unit has not used the pesticide type *Paraquat Dichlorida* since 2019. This is in line with the results of observations at the SAM Estate Warehouse, Petapahan-1 Estate and Petapahan-2 Estate that it is known that there is no stock of *Paraquat Dichlorida*.

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

7.2.6

The CH has procedures FR.CSM.OP.2 dated September 1, 2011, regarding pesticide management. This SOP regulates the classes of pesticides used, procedures for preventing accidents due to poisoning, as well as protecting the environment by using pesticides responsibly. The company has conducted various training related to pesticides, especially for sprayers, including:

- Socialization of first aid, hazardous and toxic materials symbol, hazardous and toxic waste symbols, HIRAC, HCV, waste management, harvesting and maintenance work techniques (spray and fertilizer), company policies, flow of complaints and introduction to RSPO SCCS which was held on December 13th, 2022, and was attended by 17 PT SAM foremen.
- Socialization on standards for the use of PPE, HIRAC, management of hazardous and toxic waste materials and an introduction to the contents and functions of first aid which was held on September 12th, 2022, and was attended by 18 factory workers.
- Training on pest identification in oil palm plantations and integrated pest management, which was held on May 26th, 2022, and was attended by 15 spray workers.

- Training on no spray area, no fertilizer area and introduction to wild animal species which was held on January 14th, 2022, and was attended by 8 representatives of spray and fertilizer workers.

In addition, based on observations at the SAM Estate, Petapahan-1 Estate and Petapahan-2 Estate pesticide warehouses, it is known that each pesticide has an MSDS which functions as a medium for conveying information regarding important information on the use of chemicals for occupational safety.

Based on interview with applicator pesticide that they are understand work techniques and work safety aspects.

Based on the description above, it shows that pesticides are handled, used and applied by people who have completed the necessary training and are always applied according to the product label.

7.2.7

Based on the results of field observations at the SAM Estate, Petapahan-1 Estate and Petapahan-2 Estate pesticide warehouses, it is known that the warehouses are made permanent with exhaust vents, well ventilated, pesticides do not mix with other materials, there are facilities for mixing pesticides, there are emergency response facilities such as eyes. Sufficient washer and sand, warning and HAZARDOUS symbols, and there is an MSDS.

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

7.2.8

Unit of certification has procedures for storing and handling pesticides such as: hazardous and toxic management procedures, pesticide management procedures, pesticide safety guidelines, and work instructions for first aid against pesticide poisoning. Based on result of document verification, unit of certification has SOPs for Waste Management No. FR.CSM.OP-1 which has been used since December 30, 2018. In the work instructions, a flow chart of instructions for the implementation of pesticide waste is described. The used pesticide packaging of the Hazardous waste generating unit is sent to the pesticide packaging rinsing site. The used pesticide packaging in accordance with the recommendations from the supplier, after being assessed as clean, the waste is stored and arranged in a hazardous waste storage area that has a permit.

Based on observations of rinse house in unit of certification, it is known that the estate management unit has provided a special place to carry out washing activities for work tools and PPE, where the used washing water is collected and reused for pesticide application activities. As for packaging that is reused for pesticide mixing activities, it will be marked with the Hazardous Waste symbol and its circulation is recorded. In addition, based on observations in residential areas, there was no use of use pesticide packaging for household domestic purposes.

The results of the verification to the hazardous waste warehouse, it is known that the condition of the warehouse is in good condition and well maintained, all emergency response facilities are available, and the condition of the warehouse is clean.

7.2.9

Weed and Plant Pest control at SAM Estate, Petapahan-1 Estate and Petapahan-2 Estate is done manually and chemist. Based on interviews with chemist foremen and pesticide applicators at SAM Estate, Petapahan-1 Estate and Petapahan-2 Estate as well as field observations it is known that spraying pesticides uses a knapsack sprayer and never sprays pesticides through the air.

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

7.2.10

Based on the document review, there are results of special health checks for spray workers at SAM Estate, Pelalapan-1 Estate and Petapahan-2 Estate. Based on interviews with field supervisors, it was found that the sprayers were divided into 2 teams for each estate, with the number of sprayers according to the needs of the estate. There are 21 sprayers at SAM Estate, 15 at Petapahan-1 Estate and 12 at Petapahan-2 Estate. The health check was carried out by the Medan Occupational Safety and Health Center with the following results:

- SAM Estate: Minutes of special Health check No. 105/LHU/BK3-MDN/II/2022 PT. Subur Arum Makmur Palm Oil Mil & Estate on 16 February 2022, spirometry examination of 21 sprayers, 3 spray supervisors and 5 warehouse workers at SAM Estate with healthy and normal lung results

- Petapahan-1 Estate: Minutes of special health check No. 107/LHU/BK3-MDN/II/2022 PT. Arindo Trisejahtera on 18 February 2022, spirometry examination of 15 sprayers, 2 spray supervisors and 4 warehouse workers at SAM Estate with healthy and normal lung results
- Petapahan-2 Estate: Minutes of special health check No. 108/LHU/BK3-MDN/II/2022 PT. Arindo Trisejahtera on 19 February 2022, spirometry examination of 12 sprayers, 2 spray supervisors and 3 warehouse workers at SAM Estate with healthy and normal lung results

Based on the description above, it shows that the company already has records of the results of annual special health checks for pesticide operators and evidence of follow-up on the results of their inspections.

7.2.11

Based on the document review, it is known that the spray workers at SAM Estate, Pelalapan-1 Estate and Petapahan-2 Estate are male employees, so no pregnancy test is required. This is in accordance with the results of observations and interviews in the field and it is known that the lowest age for sprayers is 20 years at SAM Estate. In addition, according to indicator 7.2.10 concerning health checks it is known that all spray workers are in good condition.

Based on the description above, it shows that there is no work related to pesticides carried out by pregnant or lactating women, or people with medical limitations and they are offered other work alternatives that are equivalent.

Status: Comply

7.3

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

7.3.1

Unit of certification has a Waste Management SOP dated December 30, 2018, with document No. FR.CSM.OP-1. This procedure describes the classification of waste including Non-Hazardous and Toxic and Hazardous and Toxic waste, Identification of waste sources, handling of non-Hazardous and Toxic waste and Hazardous and Toxic waste, Mechanism of Hazardous and Toxic waste management and reporting of Hazardous and Toxic waste management.

In the realization of waste management, it is divided into several types based on the characteristics of the waste it produces, including:

Hazardous and Toxic Waste

In the management of hazardous and toxic waste, unit of certification does not reuse it, but only temporarily stores it located in PT Subur Arum Makmur and PT Arindo Trisejahtera. The unit of certification also has a licensed hazardous waste storage area, including:

- PT Subur Arum Makmur has Recommendation of Fulfilment of Management Permit Commitment for Temporary Storage of Hazardous Waste of PT Subur Arum Makmur number 660/DLH-PPKL/REK-LB3/2020/10 dated 21 April 2020 valid 5 years. PT Subur Arum Makmur has also Permit of Operational Management of Hazardous and Toxic Waste for Producers issued by OSS Institution on 4 May 2020. Types of waste stored used oil, used batteries, used oil filters, used filters, used rags and the like, used light bulbs, used chemical jerry cans, used chemical containers, used fertilizer sacks and used chemical sacks, used cartridges, waste medical, and resin waste. Temporary storage of hazardous and toxic waste locations at 00°49'05.2" S and 100°53'17.4" E.
- PT Arindo Trisejahtera Petapahan-1 Estate has Recommendation of Fulfilment of Management Permit Commitment for Temporary Storage of Hazardous Waste of PT Arindo Trisejahtera Petapahan-1 Estate number 660/DLH-PPKL/REK-LB3/2020/11 dated 21 April 2020 valid 5 years. PT Arindo Trisejahtera Petapahan-1 Estate has also Permit of Operational Management of Hazardous and Toxic Waste for Producers issued by OSS Institution on 4 May 2020. Types of waste stored used oil, used batteries, used oil filters, used filters, used rags and the like, used light bulbs, used chemical jerry cans, used chemical containers, used fertilizer sacks and used chemical sacks, used cartridges, waste medical, and resin waste. Temporary storage of hazardous and toxic waste locations at 00°34'46.6" S and 100°55'29.0" E.
- PT Arindo Trisejahtera Petapahan-2 Estate has hazardous and toxic waste storage permit based on Decree of Head of DPMPTSP of Kampar Regency No. 503/DPM-PTSP/PEL/LB3/2017/03 dated 17 October 2017 and is valid for 5 years. The permit has expired on October 17, 2022. PT Arindo Trisejahtera has presented the following documents:
 - Letter No. 02.04/X/005/II/2023 dated February 10, 2023, from PT Arindo Trisejahtera to Environmental Agency of Kampar Regency regarding Request for Directions regarding Permit for Temporary Storage of Hazardous and Toxic Waste. The letter explains the temporary storage permit for hazardous and toxic waste No. 503/DPMPTSP.PEL/LB3/2017/09 dated 17 October 2017 has expired on 17 October 2022.

- Letter No. 660/DLH-BID3/84 dated 14 February 2023 from Environmental Agency of Kampar Regency to PT Arindo Trisejahtera II (Estate) regarding Directions for Permit for Temporary Storage of Hazardous and Toxic Waste. The letter explains that PT Arindo Trisejahtera II (Estate) is required to submit an application for a change in environmental approval without preparing a new environmental document and must be accompanied by technical details.

Based on the description above, PT Arindo Trisejahtera has the opportunity to ensure the process of changing the environmental approval without being accompanied by preparing new environmental documents and must be equipped with technical details regarding the storage of hazardous and toxic waste based on directions given by the competent authority. **(OFI)**

The waste stored in the temporary storage warehouse will then be transported by licensed party twice a year. The latest transportation is proven through the Electronic Manifest document and the official report of the transportation carried out on 9-10 August 2022 by PT Shali Riau Lestari which is a licensed party. Unit of certification can show a cooperation agreement with the carrier (PT Shali Riau Lestari), which is based on the document Agreement number 84/P-Limbah B3/ATS/LGL-PKU/IV/22 (PT Subur Arum Makmur) and number 96/P-Limbah B3/ATS/LGL-PKU/IV/22 (PT Arindo Trisejahtera) on 02 April 2022 and valid for 1 year. Unit of certification can also show the document the legality of the carrier, such as a valid transportation permit from the Ministry of Environment and Forestry, a valid permit for special goods transportation from the Ministry of Transportation, a valid Business Identification Number and a Cooperation Agreement between the carrier and a licensed processor and/or user.

Unit of certification can also show documents for storing and handling Hazardous Waste in accordance with their SOPs and Government Regulation Number 22 of 2021. These documents include Manifest, balance sheet, and logbook. Based on the results of the document review by comparing the manifest, the balance sheet, and the logbook, the data on waste transported on 4 November 2022 was in accordance with the data recorded in the balance sheet and logbook for the period before the transportation was carried out. Similarly, the comparison between the date after the transportation was carried out (9-10 August 2022) starting from empty. The unit of certification records all waste that enters and leaves the storage warehouse properly so that waste management data can be tracked easily and there are no recording differences.

Non-Hazardous and Toxic Waste

Non-hazardous waste such as domestic waste and used fertilizer sacks is managed in the form of reuse for goods that can still be used. In addition, waste that cannot be reused will be collected, if it still has economic value such as scrap metal and used tires, it will be sold to parties who cooperate with the unit of certification. Non-hazardous waste that cannot be reused will be disposed of in landfills. Transportation of non-hazardous waste from employee housing or emplacement areas is carried out once a week and immediately disposed of in a landfill, and when the landfill is full, it will be stockpiled and put-up signboards marking the opening and closing dates. Unit of certification has a policy regarding the prohibition of burning waste, including in landfill areas.

Liquid, Solid and Air Waste

Solid waste from the FFB processing process in the form of shells and fiber is reused by the unit of certification as a substitute for fossil fuels (diesel) for power generation in boilers. Meanwhile, the empty fruit bunches are used as fertilizer. Data on solid waste utilization is explained in more detail in indicator 7.9.1.

Unit of certification does use POME by applying it to land application. The regulation and management of POME are explained in more detail in indicator 7.8.3. As for air waste, the unit of certification has not made a common use for air waste, namely Biogas Plan, so far, the management related to air waste has only been limited to measuring air quality from waste-producing sources such as WWTP, boilers and gensets.

7.3.2

Based on the results of a field visit to PT Subur Arum Makmur and PT Arindo Trisejahtera, the following was found:

- Household waste scattered in front of and behind the Employee Housing Afdeling I, Afdeling VII, Afdeling VIII and the elementary school in Subur Arum Makmur Estate of PT Subur Arum Makmur.
- There are drums of used oil left on the side of the house in Employee Housing Afdeling I Subur Arum Makmur Estate PT Subur Arum Makmur.
- There is waste of used oil drums used for water storage at PT Arindo Trisejahtera's Petapahan-1 Estate.
- The results of interviews with residents of the Afdeling VIII employee housing complex show differences in the transportation periods, such as 1 time a week, 2 times a week, the householders themselves transport the waste to the landfill, or leave the waste uncollected.

- Results of interviews with management representatives at PT Subur Arum Makmur, domestic waste is managed by transporting it from the employees' housing to landfill. The waste collection period in employee housing in each Afdeling differs from one another according to the policies of each Afdeling.
- Training/Socialization Report Documents related to the handling of organic, non-organic and hazardous and toxic waste on December 13, 2022 which was carried out for 25 participants of PT Arindo Trisejahtera II workers and December 15, 2022 which was carried out for 11 participants of PT Arindo Trisejahtera I workers
- Training/Socialization Report Documents related to the handling of organic, non-organic and hazardous and toxic waste on December 5, 2022 which was carried out for 16 workers of PT Subur Arum Makmur.
- Minutes of PT Subur Arum Makmur PKS socialization document on 12 September 2022 regarding hazardous and toxic waste management which was attended by 18 workers at PT Subur Arum Makmur POM.
- Waste Management SOP Document No. FR.CSM.OP.1 with a published date of 30 December 2018 which explains the following:
 - Point 3.3.2 which explains that domestic solid waste (housing, plantations, etc.) is carried out by providing adequate trash bins. The collected waste is disposed of in the landfill.
 - Point 3.3.1 which explains that B3 waste generated by operational activities such as used B3 contaminated packaging, used/damaged pesticide sprayers, used fertilizer sacks and TL light bulbs are stored in the Hazardous and Toxic Waste Temporary Storage.

Until the assessment is carried out, the unit of certification has not been able to show evidence that the management of hazardous and toxic waste and household waste is in accordance with the stipulated procedures. Thus, the nonconformity in this indicator has not been fulfilled. Therefore, nonconformity **No. 2021.06 has changed to Minor raised to Major category.**

7.3.3

Based on the results of a field visit to PT Subur Arum Makmur and PT Arindo Trisejahtera, the following was found:

- Trash burned behind the Employee Housing Afdeling I, Afdeling VII, Afdeling VIII and the elementary school in Subur Arum Makmur Estate of PT Subur Arum Makmur. In addition, each housing has a board warning against burning garbage in housing and all estate.
- The results of interviews with residents of the Afdeling VIII employee housing complex show differences in the transportation periods, such as 1 time a week, 2 times a week, the householders themselves transport the waste to the landfill, or leave the waste uncollected.
- Results of interviews with management representatives at PT Subur Arum Makmur, domestic waste is managed by transporting it from the employees' housing to landfill. Domestic waste management is prohibited from burning.
- Training/Socialization Report Documents related to the handling of organic, non-organic and hazardous and toxic waste on December 13, 2022, which was carried out for 25 participants of PT Arindo Trisejahtera II workers and December 15, 2022, which was carried out for 11 participants of PT Arindo Trisejahtera I workers.
- Training/Socialization Report Documents related to the handling of organic, non-organic and hazardous and toxic waste on December 5, 2022, which was carried out for 16 workers of PT Subur Arum Makmur.
- Internal Circular Document No. SE-INT/SAM-1/005/II/2022 regarding the Cleanliness of the Residential Environment which was approved by GM PT SAM 1 on January 11, 2022. The document shows that there is a prohibition against littering both in residential areas or throughout the PT SAM 1 plantation area and a ban on dumping garbage.

Until the assessment is carried out, the unit of certification has not been able to show evidence that the management of hazardous and toxic waste and household waste is in accordance with the established policies. Thus, the nonconformity in this indicator has not been fulfilled. Therefore, nonconformity **No. 2021.07 has changed to Minor raised to Major category.**

Status: Nonconformity No. 2021.06 with Minor raised to Major category Status: Nonconformity No. 2021.07 with Minor raised to Major category
--

7.4

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

7.4.1

The CH has procedures for managing soil fertility in terms of inorganic and organic fertilization. In this procedure, it is explained that the recommended dosage of fertilization is issued by the Research Department based on several factors such as actual FFB production, projected FFB production, plant age, plant nutritional status, leaf analysis (LSU), field observations, fertilization history, soil analysis results (SSU), rainfall data, fertilizer trial results, and others.

Based on the results of interviews and observations at SAM Estate, Petapahan-1 Estate and Petapahan-2 Estate, it is known that the unit of certification has done the following:

- The realization of fertilization is based on the recommendations of the research department that conducts leaf and soil analysis
- LCC cultivation such as *Mucuna Bracteata* and *Neprolepis* maintenance
- Weed control is done selectively.
- Drainage arrangement

The unit of certification also performs empty fruit bunches and POM liquid waste applications. The 2022 empty fruit tree application will be carried out throughout the estate, namely at SAM Estate 81,864 Tons, Petapahan-1 Estate 2,833 Tons, and Petapahan-2 Estate 2,671 Tons. Meanwhile, the application of POM liquid waste in 2022 will be carried out at SAM Estate as much as 208,226 m³

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

7.4.2

The company has conducted periodic leaf and soil analyses to monitor and manage changes in soil fertility and plant health conducted by the Research Department of PT. Panca Surya Garden (First Resources Group). Leaf analysis is carried out annually and analysis of soil samples is carried out every 5 years. The results of the analysis of leaf samples and analysis of soil samples are as follows:

- Leaf Analysis
 - LSU Petapahan-1 Estate No. 01/PSG/RST-LAB/II/2022 dated 10 February 2022 with an analysis of 29 samples of leaves. The parameters analysed were N, P, K, Mg, Ca, Fe, Cu, Zn, and B
 - LSU Petapahan-2 No. 02/PSG/RST-LAB/II/2021 February 15, 2021, with an analysis of 21 samples of leaves. The parameters analysed were N, P, K, Mg, Ca, Fe, Cu, Zn, and B
 - LSU SAM Estate No. 46/PSG/RST-LAB/V/2022 dated 19 May 2022 with an analysis of 29 samples of leaves. The parameters analysed were N, P, K, Mg, Ca, Fe, Cu, Zn, and B
- Soil Analysis
 - SSU SAM Estate No. 08/R&D/PSG/SOIL.SURVEY/X/2017 dated 11 November 2017. The parameters analysed were C-Organic, -N, N-Total, C/N, CEC (me/100 g), P-available (Bray 2), K-dd (me/100 g), Ca-dd (me/100 g), Na-dd (me/100 g), Mg-dd (me/100 g), Kej Alkaline (%), pH_{H2O})
 - SSU Petapahan-1 Estate & Petapahan-2 Estate No. 01/R&D/PSG/SOIL.SURVEY/XII/2022 dated 23 December 2022. The parameters analysed were SSU C-Organic, -N, N-Total, C/N, CEC (me/100 g), P-available (Bray 2), K-dd (me/100 g), Ca-dd (me/100 g), Na-dd (me/100 g), Mg-dd (me/100 g), Kej Alkaline (%), pH_{H2O})

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

7.4.3

The CH has used EFB and POM liquid waste as an alternative method for managing soil fertility. The 2022 empty fruit tree application will be carried out throughout the estate, namely at SAM Estate 81,864 Tons, Petapahan-1 Estate 2,833 Tons, and Petapahan-2 Estate 2,671 Tons. Meanwhile, the application of POM liquid waste in 2022 will be carried out at SAM Estate as much as 208,226 m³. The non-organic fertilizers are used optimally according to R & D recommendations with leaf and soil analysis.

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

7.4.4

The CH has an organic and inorganic fertilization program policy in accordance with leaf and soil analysis as described in indicator 7.4.2. The company has records of the realization of organic fertilization for the period January – December 2022, namely:

- SAM Estate, application of Urea Fertilizer 1,251,855 Kg, RP Fertilizer 929,540 Kg, MOP Fertilizer 1,060,443 Kg, HGFB 71,585 Kg, and Dolomite Fertilizer 304,642 Kg.
- Petapahan-1 Estate, application of Urea Fertilizer 1,039,059 Kg, RP Fertilizer 476,898 Kg, MOP Fertilizer 904,062 Kg, Kieserite 25,191 Kg, Dolomite Fertilizer 304,642 Kg, NPK Fertilizer 15:15:6:4 9,568 Kg, HGFB Fertilizer 27,644 Kg, and NPK Fertilizer 14:6:22:4 98,143 Kg

- Petapahan-2 Estate, application of Urea Fertilizer 405,971 Kg, RP Fertilizer 339,362 Kg, MOP Fertilizer 349,855 Kg, Kieserite Fertilizer 12,944 Kg, Dolomite Fertilizer 216,008 Kg, HGFB Fertilizer 9,157 Kg, and NPK Fertilizer 15:15:6:4 19,339 Kg

In addition, there is organic fertilization in the form of the 2022 empty fruit application which will be carried out throughout the estate, namely at SAM Estate 81,864 Tons, Petapahan-1 Estate 2,833 Tons, and Petapahan-2 Estate 2,671 Tons. Meanwhile, the application of POM liquid waste in 2022 will be carried out at SAM Estate as much as 208,226 m³.

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

Status: Comply

7.5

Practices minimise and control erosion and degradation of soils.

7.5.1

The CH has conducted a Semi-Detailed Land Survey study to find out the type of soil, and the condition of the slope of the area which was carried out by the Soil Survey & Land Evaluation Research & Development Team – First Resources Group at SAM Estate, Petapahan-1 Estate and Petapahan-2 Estate in January 2023 with the following results:

- SAM Estate

Type of soil	Slope (%)	Ha	%	Restricting factor
Aquic Dystrudepts	0-8	1,386	14	Natural fertility
Typic Dystrudepts	0-8	353	4	Natural fertility
Typic Endoaquepts	0-8	7,360	80	Natural fertility, soil structure
Typic Hapludults	0-8	182	2	Natural fertility
TOTAL		9,271	100	

- Petapahan-1 Estate

Type of soil	Slope (%)	Ha	%	Restricting factor
Typic Endoaquults	0-8	425.64	111.4	Balanced fertilizer & drainage
Typic Dystrudepts	0-8	899.81	24,1	Balanced fertilizer & drainage
Typic Dystrudepts	8-15	1829,49	49	Balanced fertilizer & provision of organic matter
Typic Dystrudepts	15-30	582.45	15,6	Balanced fertilizer, provision of organic matter & felt
		3,733.65	100	

- Petapahan-2 Estate

Type of soil	Slope (%)	Ha	%	Restricting factor
Typic Endoaquults	0-8	968,69	25.00	Drainage and nutrient content
Typic Dystrudepts	0-8	1034.56	26,70	Drainage and nutrient content
Typic Dystrudepts	8-15	1216.68	31,40	natural nutrient content
Typic Dystrudepts	15-30	654,84	16.90	Slope slope and nutrient content
		3,874.77	100	

Companies can provide soil maps or soil surveys that identify marginal and fragile soils. The map has a scale of 1:30,000 sourced from PT SAM's concession area and PT SAM's detailed land survey observations. The soil type map explains the types of soil in PT SAM's operational areas such as Aquic Dystrudepts, Typic Dystrudepts, Typic Endoaquepts, Typic Hapludults.

PT ATS has identified marginal and fragile soils as well as steep slope land contained in the PT Arindo Trisejahtera Soil survey & Land evaluation. The document contains maps of Petapahan 1 Estate and Petapahan 2 estate with a scale of 1: 20,000 describing marginal land in the form of sandy land in Petapahan 1 with an area of 484.69 Ha and in Petapahan 2 with an area of 266.91 Ha. Based on the

study of this document, it is known that there is no peatland in the area of PT Arindo Trisejahtera. The types of soil found in the PT Arindo Trisejahtera area are Aeris Endoaquepts and Typic Dystrudepts

Based on the description above, it shows that the company already has maps that identify marginal and fragile soils, including land with steep slopes.

7.5.2

Based on the results of the document review, it is known that the replanting work at Petapahan-1 Estate has been completed in 2021. Replanting activities have not been carried out at SAM Estate yet because FFB production is still high, namely above 20 tons/ha/year in 2022 and it is projected that for the next few years FFB production still high. Replanting activities are currently being carried out at Petapahan-2 Estate. Based on semi-detailed soil survey results and field observations, it is known that area replanting is not carried out on land with steep slopes but is carried out on land with a slope of 0-30%. This is in accordance with the results of field observations in Block 38 Afdeling 4 Petapahan-2 Estate with a slope of between 0-8%.

Based on the description above, it shows that the company does not replant oil palm extensively on steep slopes according to applicable regulations.

7.5.3

Based on semi-detailed soil survey results and field observations, it is known that area replanting is not carried out on land with steep slopes but is carried out on land with a slope of 0-30%. This is in accordance with the results of field observations in Block 08 Afdeling 4 Petapahan-2 Estate with a slope of between 8-15%. In the process of reblocking the condition of the area has been made felt to facilitate the process of harvesting, maintenance, road management and water management.

Based on the description above, it shows that the company does not replant oil palm on steep slopes according to applicable regulations.

Status: Comply

7.6

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

7.6.1

The CH has conducted a Semi-Detailed Soil Survey study to identify marginal and fragile soils and the slope conditions of the area which was carried out by the Soil Survey & Land Evaluation Research & Development Team – First Resources Group at SAM Estate, Petapahan-1 Estate and Petapahan-2 Estate in January 2023 with the following results:

- SAM Estate

Type of soil	Slope (%)	Ha	%	Land suitability	Restricting factor
Aquic Dystrudepts	0-8	1,386	14	S2	Natural fertility
Typic Dystrudepts	0-8	353	4	S2	Natural fertility
Typic Endoaquepts	0-8	7,360	80	S3	Natural fertility, soil structure
Typic Hapludults	0-8	182	2	S2	Natural fertility
TOTAL		9,271	100		

Based on the table above it can be concluded, as follows:

- The SAM Estate area in land suitability for oil palm plantations can be categorized into suitable land (S2) covering an area of 1,911 Ha (20%) and marginally suitable (s3) covering an area of 7,360 Ha (80%)
- The main limiting factor in the area of PT. SAM 1 is natural fertility and drainage which can be improved by providing ameliorant materials and making drainage.

- Petapahan-1 Estate

Type of soil	Slope (%)	Land suitability		Restricting factor	Ha	%
		actual	Potential			
Typic Endoaquults	0-8	S2	S2	Balanced fertilizer & drainage	425.64	11,4
Typic Dystrudepts	0-8	S2	S2	Balanced fertilizer & drainage	1034.56	26,7
Typic Dystrudepts	8-15	S2	S1	Balanced fertilizer & provision of organic matter	899.84	24,1
Typic Dystrudepts	15-30	S3	S3	Balanced fertilizer, provision of organic matter & felt	654,84	16,9
TOTAL					3,733.65	100

Based on the table above it can be concluded, as follows:

- Soil distribution consists of 4 soil map units, namely Typic endoaquepts and typic dystrudepts with different slope levels
- In the Petapahan-1 Estate survey area, the main limiting factors are slow drainage, natural elements and slope
- Soil fertility is very important to be prioritized seeing from the results of sample analysis which shows the availability of nutrients in the mash soil is low to be absorbed by plants, one of which is by adding ameliorant materials, both lime and organic matter to improve the physical, chemical and biological properties of the soil, it is highly recommended to support optimal growth and development of cultivated plants

- Petapahan-2 Estate

Type of soil	Slope (%)	Land suitability		Restricting factor	Ha	%
		actual	Potential			
Typic Endoaquults	0-8	S2	S2	Drainage and nutrient content	968,69	25.00
Typic Dystrudepts	0-8	S2	S2	Drainage and nutrient content	1034.56	26,70
Typic Dystrudepts	8-15	S2	S1	natural nutrient content	1216.68	31,40
Typic Dystrudepts	15-30	S3	S3	Slope and nutrient content	654,84	16.90
TOTAL					3,874.77	100

Based on the description above, it shows long-term suitability between land and oil palm cultivation and consideration of land maps in the company's operational plans.

7.6.2

The CH has identified marginal and fragile soils according to the results of a soil survey conducted by the Soil Survey & Land Evaluation Research & Development Team – First Resources Group at SAM Estate, Petapahan – 1 Estate and Petapaha-2 Estate in January 2023. Based on the results of the document review, it is known that the planting in Petapahan-1 Estate, Petapahan-2 Estate and SAM Estate was not carried out on marginal soils. The company has carried out soil management using the best cultivation methods, namely monitoring soil fertility through periodic analysis of soil and leaves, organic fertilization using empty stems and application of liquid waste. In addition, the company makes optimal inorganic fertilizers based on the recommendations from the research department.

Based on the description above, it shows that the company does not replant oil palm extensively on steep slopes according to applicable regulations

7.6.3

The CH has identified marginal and fragile soils according to the results of a soil survey conducted by the Soil Survey & Land Evaluation Research & Development Team – First Resources Group at SAM Estate, Petapahan-1 Estate and Petapaha-2 Estate in January 2023. Based on the map Topographically it is known that the entire area of SAM Estate, Petapahan-1 Estate and Petapahan-2 Estate consists of flat slopes with 0-8% wavy, 8-15% wavy waves, and 15-30% hilly waves and no areas with steep slopes. >30%. In addition, based on the results of field observations at SAM Estate, Petapahan-1 Estate and Petapaha-2 Estate, it is known that there is no land with steep or very steep slopes. The company has used this topographic and land survey information to determine, among other things, the layout of the ditches so that they can maintain water availability. In addition, it is used to make transport roads for plant maintenance and harvesting activities.

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

roads and other infrastructure

Status: Comply

7.7

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

7.7.1 – 7.7.7

Based on the soil survey report in January 2023 conducted by the Soil Survey & Land Evaluation Research & Development Team (First Resources Group) at SAM Estate, Petapahan-1 Estate and Petapahan-2 Estate, it is known that there are 4 types of soil, namely Aquic Dystrudepts, Typic Endoaquepts, Typic Dystrudepts, Typic Hapludults and no peat soil types. So, this indicator cannot be applied to PT. Subur Arum Makmur and PT. Arindo Trisejahtera.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

Unit of certification has implemented water management to support the efficient use of water sources and continuous availability, as well as avoiding negative impacts on other users in the catchment area. Management and implementation activities are documented in environmental management and monitoring implementation report every semester. In addition, the unit of certification also has a Water Management Plan and Management and Monitoring as well as several regulations and technical guidelines related to water management, including SOPs for high conservation value management programs. The unit of certification also has a water management strategy as stated in the problem identification document and problem-solving planning. Other supporting documents are documents on environmental impact assessment and documents on the identification of high conservation value areas in 2012.

Unit of certification also conducted regularly water quality testing every semester for PT Subur Arum Makmur oil palm plantations by taking points of river water sampling, namely the upstream and downstream areas of Kepanasan River. Meanwhile, on PT Arindo Trisejahtera surface water testing on upstream and downstream Tapung River. Water quality testing results refer to the threshold set up in Government Regulation No. 22 of 2021. Last water quality testing was conducted on 8 September 2022 in collaboration with an accredited laboratory (LP-412-IDN) for 39 parameters still accordance with threshold value refers to Government Regulation No. 22 of 2021 Class 2.

Unit of certification also conducts groundwater quality testing. Results of groundwater quality analysis of PT Subur Arum Makmur and PT Arindo Trisejahtera on 19-22 September 2022. Based on the results of the test, no parameter exceeds the threshold value determined in accordance with the Minister of Health Regulation No. 32 of 2017 appendix I. Workers have also adequate access to clean water as this groundwater is used for worker to meet daily water needs (i.e. clean water for washing and bathing needs). The results of interviews with resident of employee housing of Subur Arum Makmur Estate, Petapahan-1 Estate and Petapahan-2 Estate stated that there were never any complaints about groundwater.

7.8.2

Unit of certification has procedures related to identification, management and maintenance of water sources and quality which are listed in SOP for management and monitoring of HCV No FR.EAC.IMM dated 12 January 2015 which states: it is prohibited to carry out fertilization and spraying pesticides. The classification of river border width is divided based on the width of the river as follows:

- River width > 30 m: zone 1 0-10 m, zone 2 10-50 m, zone 3 50-100 m, total 100m.
- River width < 30 m: zone 1 0-10 m, zone 2 10-30 m, zone 3 30-50 m.
- The document explains the technicalities of plantation management starting from the zero point of the riverbank.

Unit of certification continues to make efforts to manage water sources such as periodically testing surface water quality standards to ensure water quality is still within normal limits every semester, as well as marking the boundaries of the chemical application area in colour. In addition, unit of certification also conducts socialization to employees and the surrounding community in conservation efforts which can be proven based on the minutes of socialization to workers and to the community on 13 December 2022. Interviews with spraying and fertilizing workers in Subur Arum Makmur Estate, Petapahan-1 Estate and Petapahan-2 Estate also stated that they were aware of the rules regarding chemical application limits, prohibition of washing chemically contaminated goods in water bodies and other activities that have a negative impact on the environment water sources.

7.8.3

All palm oil mill effluent produced by Subur Arum Makmur POM is processed at the wastewater treatment plant before being distributed to plantations as land applications. Monitoring is carried out every month regularly and reported to Environmental Agency of Kampar Regency every semester. Unit of certification can show evidence regarding results of POME quality measurement in a document of the effects of tests carried out by accredited laboratory (LP-894-IDN). The analysis of the test results for the period January-December 2022 shows that all parameters are by the applicable quality standards. This indicates that the liquid waste generated from FFB management activities can be applied to land applications. Unit of certification already has a Land Application Permit based on Decree of Ketapang Regent No 503/DPM-PTSP.PEL/LA/2018/01 regarding permit for use of palm oil industrial wastewater on the oil palm plantation land of PT Subur Arum Makmur which was approved by Head of Investment and One Stop Integrated Services Office of Kampar Regency on 15 February 2018 and valid for five years. The application area of 325 ha is in 12 blocks (H24 to H32 and Blok G24 to G26) with a total area of 291.71 Ha.

7.8.4

Unit of certification already has a Surface Water Utilization Permit for PT Subur Arum Makmur unit based on Decree of Minister of Public Works and Public Housing Number HK.05.03/01/REKOMTEK/BWSS-III/2023 on 08 February 2023 and is valid for 5 years. In the document there is a provision for a quota of surface water intake of 44.416 m³/month from Kepanasan River (N 0°48'44.84" and E 100°53'11.72"). Unit of certification can also show documents for recording daily water use, as well as the results of the recapitulation of water use for palm oil processing units every month. For example, unit of certification can show recapitulation of water use for January-December 2022 period. Based on those data, it can be obtained that average water use for FFB processing is 349,446 m³/month while the total water use is 342,091 m³/ and average water use is 28,507.58 m³/month. Based on these data, the use of water is in accordance with provision in its permit. Unit of certification has shown example of payment of water usage to *Badan Pendapatan Daerah Provinsi Riau* for period of July-December 2022 with payment period monthly. Payment for water usage in December 2022 period has done on 23 January 2023.

Result of field observation in Water Treatment Plan (WTP) and water intake also show that the flowmeter used is still functioning properly. Result of interview with officers responsible for WTPs also show that operators are very understanding about how WTPs work and recording flowmeter data. Officers can also show data in and out of water which is recorded every day.

Status: Comply	
-----------------------	--

7.9
Efficiency of fossil fuel use and the use of renewable energy is optimized.
7.9.1

Unit of certification 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.

Unit of certification has a record of the use of renewable energy or fossil energy are explained on recapitulation GHG source POM in 2022. Directly, the unit of certification already maximizing the use of renewable energy (fiber & shell) as boiler fuel. For example, use of shells and fiber period January-December 2022 has produces 85,684 kWh of electricity from turbine. Renewable energy use per ton of palm product in the mill is 26.44 kWh /ton FFB processed. Result direct fossil fuel used is 4.45 kWh/litre.

Status: Comply	
-----------------------	--

7.10
Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.
7.10.1

Unit of certification 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, waste piling and electricity consumption.

Identification of significant GHG gas emission source is identified, and mitigation plan has been developed by unit of certification

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 Subur Arum Makmur POM have been implemented by fiber/shell usage for boiler. POME has been monitored every month and monitoring periods January-December 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 etc. found that accurate data has been put into the RSPO palm GHG Calculator. 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 Subur Arum Makmur POM and its supply base for period of January-December 2022 are listed as follows:

Summary Emissions

Description	Value	Unit	Description	Value	Unit
CPO	0.61	tCO ₂ e/tProduct	Oil palm planted on mineral soil	16393.41	Ha
PK	0.61	tCO ₂ e/tProduct	Oil palm planted area on peat	0.00	Ha
PKO	0.00	tCO ₂ e/tProduct	Total oil palm planted area	16393.41	Ha
PKE	0.00	tCO ₂ e/tProduct	Conservation area (Forested)	18.66	Ha
OER	20.48	%	Conservation area (Non-Forested)	0.00	Ha
KER	5.83	%	FFB Production per hectare	21.32	t/ha

Mill Emissions and Credits & Emissions from Palm Kernel Crusher

Mill Emissions and Credits			Emissions from Palm Kernel Crusher	
Emission Source and Credits	tCO ₂ e	tCO ₂ e/t FFB	Emission Source	tCO ₂ e
POME	36671.80	0.10	PK from own mill	0.00
Fuel Consumption	283.06	0.00	PK from other sources	0.00
Grid Electricity Utilization	474.81	0.00	Fuel Consumption	0.00
Export of Excess Electricity to Housing & Grid	0.00	0.00	Total Crusher Emissions	0.00
	-			
Sale of PKS	34303.70	-0.10		
Sale of EFB	0.00	0.00		
Total	3125.97	0.01		

Summary of field emission and Sinks

Description	Own		Group		3 rd Party		Total
	tCO ₂ e	tCO ₂ e/t FFB	tCO ₂ e	tCO ₂ e/t FFB	tCO ₂ e	tCO ₂ e/t FFB	
Emission Source							
Land Conversion	47228.66	0.23	73875.01	1.10	0.00	0.00	121103.66
CO ₂ Emissions from Fertiliser	3324.33	0.02	3778.32	0.06	0.00	0.00	7102.66
N ₂ O Emissions from Peat	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N ₂ O Emissions from Fertiliser	3590.61	0.02	4136.40	0.06	0.00	0.00	7727.02
Fuel Consumption	893.00	0.00	809.39	0.01	0.00	0.00	1702.39
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Sinks							
Crop Sequestration	-37143.52	-0.18	-54072.24	-0.80	0.00	0.00	-91215.76
Sequestration in Conservation Area	0.00	0.00	-151.21	-0.00	0.00	0.00	-151.21
Total	17893.08	0.09	28375.67	0.42	7113.50	0.00	53382.25

Palm Oil Mill Effluent (POME) Treatment

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

POME Divert to Anaerobic Digestion

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

Total conservation area of unit of certification is 97.05 ha and has been categorized as conservation area of 18.66 ha and conservation potential of 78.39 ha. Conservation potential area is in form of riparian area has been included in planted area in ASA-3. It is also shown that GHG emission in the unit of certification in this assessment is 0.61 tCO₂e/tProduct.

7.10.2

Based on the document review, it is known that the company's initial planting year was 1993 and the last one was 2004. Until the ASA-3 was carried out there were no new planting activities or new land clearing activities over 2014. On scope PT ATS also do not conduct any new development since November 2005. Planting year for Petapahan-1 Estate and Petapahan-2 Estate are consist of year 1992-1997.

GHG emission reduction mitigation plan developed by the company is the use of renewable fuels in the form of shells and fiber as a substitute for diesel, performing maintenance on operational equipment on a regular basis, and utilizing POME in land applications. Unit of certification can show records of GHG mitigation for Estate and Mill units, for example the use of fertilizers according to the dose, routine maintenance of operational vehicles, socialization of the prohibition of burning waste, implementation of efficient use of electricity and integrated pest control to minimize the use of pesticides.

7.10.3

Unit of certification has identified source of pollution and mitigation plan contained in identification and evaluation form document of GHG Mitigation SOP with document No. FR.CSM.GRK revision 1 dated 26 February 2013. Unit of certification has also carried out management and monitoring related to results of identification and mitigation plans as evidenced through Report of Management and monitoring Implementation of Semester II 2022 and has reported it to Environmental Agency of Kampar Regency on 10 February 2023.

Based on verification of the document, it shows that in the management of air pollution, the certification unit has tested air emissions on boilers and generators as well as ambient air. The test is carried out by a KAN accredited laboratory (LP-412-IDN) on 10 August 2022. Based on the analysis of the test results, it can be concluded that there is no value above the applicable quality standard, namely Environment Ministry Regulation Number 07 of 2007 for Boilers, Environment Ministry Regulation Number 13 of 2009 for Gensets and Government Regulation Number 22 of 2021 for ambient air.

In addition, unit of certification has also carried out management for interference from immovable sources. The tests were carried out by accredited laboratory (LP-412-IDN) on 10 August 2022. The tests carried out by unit of certification included testing for odor, vibration, and noise in the work area and housing. Based on the results of document verification, it shows that all test results are in accordance with the quality standards set for each applicable statutory regulation.

Result of interview with boiler and generator officers stated that there was never any hearing loss experienced by the informants or other factory workers. Unit of certification has also carried out routine health checks. The resource person also explained that the

obligation to use PPE in the work area is an obligation that must not be violated, warnings about the use of PPE and checking the completeness of PPE are also applied in the company.

Status: Comply

7.11

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

7.11.1

Until the field observation to operational activities in estate in Subur Arum Makmur Estate, Petapahan-1 Estate and Petapahan-2 Estate, the certification unit does not carry out new plantings or replanting by burning. In addition, based on the results of interviews with the Environmental Agency of Kampar Regency, there were no issues related to land clearing or replanting by burning in the certification unit.

7.11.2

Unit of certification has prepared firefighting equipment, a firefighting team, land fire control tower. Unit of certification has shown a list of facilities and infrastructure owned by referring to equipment standardization in the Minister of Agriculture Regulation number 5 of 2018 and the equipment monitoring every month. Management and monitoring actions related to the prevention of forest and land fires, the company carries out according to what is stated in the management and monitoring plan for semester 1 of 2021, which are described as follows, for example:

- Implementing a zero-burning system by clearing land using heavy equipment.
- Management and monitoring program HCV.
- Formation of firefighting teams in each estate and at the factory.
- Hold firefighting training in each for employees.
- Carry out routine patrols.
- Installation of signboards prohibiting forest burning in plantation areas

Result of field observation at the Fire Preparedness Storage in each estates show that all facilities and infrastructure are in good condition and well maintained, firefighting simulation activities are also running well, and the tools used can function optimally. The unit of certification already has complete facilities and infrastructure, as shown in the document List of Fire Extinguishing Equipment and Other Equipment, with the latest update in 2023. The interviews with several employees also stated that the unit of certification had made efforts to prevent and control fires by installing signboards, socialization, and fire simulation by the firefighting team in PT Subur Arum Makmur and PT Arindo Trisejahtera on 12 September 2022.

7.11.3

Unit of certification routinely conducts socialization and training to employees for fire prevention and control activities, some examples of activities that have been carried out include documentation in the form of socialization reports, simulations, and training for land, plantation, and forest firefighters in collaboration between PT Subur Arum Makmur and PT Arindo Trisejahtera on 12 September 2022 with 27 participants, the training participants also involved villages surrounding unit of certification. Based on result of interview with Danau Lancang Village and Suka Ramai Village representatives, it is known that there is no issue related to land fire caused by the unit of certification. Based on result of interview with Environmental Agency of Kampar Regency and Plantation, Livestock and Animal Health Agency of Kampar Regency, it is also known that there is no history of fire incident in unit of certification's area within 1 year.

Status: Comply

7.12

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

7.12.1 & 7.12.8

Based on verification results of area statement document, it is known that the unit of certification do not conduct any new development since November 2005. Last land clearing/planting was carried out in 2004. Planting year for PT Subur Arum Makmur lasts in 2004, while PT Arindo Trisejahtera in Petapahan-1 Estate and Petapahan-2 Estate are consisting of year 1992-1997. PT Subur Arum Makmur has sent proof of sending the Disclosure of Area Cleared Without Prior HCV Assessment since November 2005 to the RSPO secretariat on July 31, 2014, and has received a reply/response from the RSPO secretariat on 12 August 2014 stating that it is related to the request for supporting data. In addition, PT Subur Arum Makmur has Land Cover Change Analysis report. Results of overlaying the company's HGU map with Landsat 5 acq imagery for August 2005 and July 2009, based on the results of a study by LUCA it is known that in 2005 November 2005 PT SAM had become an oil palm plantation with an area of 8879.93 ha of which 48.79 ha are community

oil palm areas within the company's HGU. The same thing in 2009 in July, the total area of oil palm plantations was 8879.93 ha of which 48.79 ha of which were community oil palm areas within the company's HGU. Unit of certification shows an email from the RSPO dated 23 June 2016 stating that of all companies in the First Resources Group, there are only 3 companies that have raw liability (PT SMP, PT PSA, PT GSI). Based on interviews with company staff, the student email is a statement from the RSPO for 1 group First Resources. So that, PT SAM is deemed to have no liability. PT Arindo Trisejahtera has conducted disclosure of liability to RSPO secretariat on August 12, 2014, and there has been a response on 23 June 2015 which explains that in PT ATS has zero liability.

7.12.2

The first planting year was carried out in 1993. Based on the verification of land clearing data there was no indication of any new land clearing after 15 November 2018, therefore the unit of certification has no obligation to conduct a High Carbon Stock (HCS) study. The area to be managed has been assessed for HCV, which is divided into 2 parts of study, including:

- Identification and Analysis of Existence of High Conservation Values of PT Suber Arum Makmur in April 2010. The study was conducted by Environment & Conservation Specialist First Resources using reference to 2008 HCV toolkit, with field data collection dates on 13-15 March 2011. Based on the results of identification, area of 70.45 hectares, namely the river riparian area of the Kepanasan River (HCV 1.2 and HCV 4.1) was obtained.
- Identification and Analysis of Existence of High Conservation Values of PT Arindo Trisejahtera in 2007. The study was conducted by Environment & Conservation Specialist First Resources, with field data collection dates on 26-31 March 2007. PT Arindo Trisejahtera has been conducted HCV assessment for the entire area of operations on 2007, therefore HCV approved assessor or HCV ALS is not applicable. The process of HCV identification conducted by using HCV identification guides in Indonesia. Based on the results of identification, each HCV areas have been mapped, and covered areas with following details respectively, HCV 1.2/4.1 covered 9.33 ha on Petapahan-1 Estate, HCV 4.1 on Petapahan-2 Estate covered 16.27 ha, and HCV 6 on Petapahan-2 Estate covered 1.0 ha.

Total conservation area of unit of certification is 97.05 ha and has been categorized as conservation area of 18.66 ha and conservation potential of 78.39 ha. Conservation potential area is in form of riparian area has been included in planted area in ASA-3. The HCV area has covered all areas that have the potential to become protected areas. Based on the explanation above, it can be concluded that the company already has documents identifying protected areas and areas of high conservation value.

7.12.3

Based 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

There was no change in the study of the HCV identification document in 2007 & 2011, both the scope of the study and the companies has included all operational activities. The unit of certification manages the HCV area by providing boundary markers, signboards and markers for the boundaries of the HCV area. In addition, the unit of certification also has a management plan that is prepared annually which aims to update management and monitoring needs, the annual program for the 2022 period includes:

- Maintenance of HCV are performed every month.
- Socialization to employees is done once every once a year.
- Patrols of HCV area are performed every month.

The implementation of HCV management and monitoring for 2022 is carried out in accordance with the 2022 HCV Management Plan where the timing and intensity of implementation are also appropriate, which can be demonstrated based on the following sample documents:

- Socialization of the HCV area to Petapahan-1 Estate, Petapahan-2 Estate employees on 13 December 2022 which was attended by 16 employee representatives.
- Socialization of the HCV area to PT Subur Arum Makmur employees on 13 December 2022 which was attended by 17 employee representatives.
- Availability of documents for maintaining HCV Petapahan-1 Estate, Petapahan-2 Estate and Subur Arum Makmur Estate boundary markings for December 2022.

The unit of certification also conducts a review related to management and monitoring activities in 2022 as evidenced in the 2022 HCV Management Plan Review Report which contains evaluation and management and monitoring recommendations as an effort to improve

HCV management activities in 2023. This integrated management plan has been developed in consultation with relevant stakeholder which is held on 19 December 2022.

7.12.5

The certification unit has also considered various land tenure and management options to protect HCV management areas to protect the rights and livelihoods of local communities. The certification unit showed a joint management agreement document for the HCV area dated January 8, 2019, between PT SAM and the Head Village of Danau Lancang (in this case representatives from the Danau Lancang Village community). Based on management and monitoring HCV implementation document and interview with representative of Danau Lancang Village, it is known that unit of certification has done socialization related to HCV area as a protected area, and they also recognized no chemical applications on conservation areas in 2022. Representative of Danau Lancang Village also have deep understanding related to protected species and a ban on hunting of protected species.

7.12.6

The unit of certification has shown the following documents:

- Document of Directors Decree No. 001/SUSTAINABILITY_FR/XI/2018 concerning Policy for Handling Protected Wildlife 26 November 2018.
- Document Circular Number: PH/SE/VII/2018 dated 1 July 2018 from Plantation Group Manager to all plantation and POM employees regarding Sanctions for Conservation Violations, explained as follows:
 - Every employee is prohibited from hunting animals in the company area
 - It is forbidden to electrocute, bomb, and use poison in the river border area
 - Every employee is prohibited from catching, injuring, killing, keeping, possessing, maintaining and trading protected or unprotected animals.
 - If the employee violates the provisions above, the employee will be subject to sanctions with the provisions of the regulations that apply in Indonesia.
- Biodiversity Report of PT Subur Arum Makmur-1 Year 2022 which contains field identification of protected animals based on Minister of Environment and Forestry Regulation No. 106 of 2018, IUCN and CITES with the result that long-tailed monkeys are wild animals with unprotected status in *Permen LHK* No. 106 of 2018, wild animals with Endangered (EN) status in the IUCN, and wild animals in CITES Appendix II.
- Documents Report on Training/Socialization on understanding of wild animal species on 10 February 2022 at PT Subur Arum Makmur to 6 participants of spray workers.
- The results of a field visit to the Afdeling VII Employee Housing Complex at Subur Arum Makmur Estate showed that monkeys have been kept in the housing complex for the past 5 months.

The unit of certification has not shown evidence that it has implemented wildlife protection in accordance with its policies. Thus, this has been nonconformity **No. 2023.03 with Minor category.**

7.12.7

Monitoring of protected areas in 2022 is carried out regularly every month to ensure the area's security. Monitoring activities were carried out at several river border locations. The results of field visits to several conservation areas show that the company has managed protected areas such as replanting local species, not logging, not using chemicals, installing Protected Area signs, and prohibiting hunting. Avoiding and preventing illegal hunting and encroachment of HCV areas that PT Sumber Arum Makmur and PT Arindo Trisejahtera has designated, several warning boards have been posted regarding the prohibition of hunting and encroachment. Several personnel appointed by the company carries out routine monitoring of HCV areas. The results of field observations also show that signs prohibit the hunting of protected animals, burning, and marking the boundaries of conservation areas.

Unit of certification also conducts annual monitoring and evaluation to manage HCV areas. This activity aims to identify risks and impacts on conservation areas and improve protection efforts. Some of the proposed actions are based on the results of the 2022 evaluation conducted in June 2022, for example:

- Monitor habitat conditions and threats/disruptions.
- Rehabilitation and Enrichment
- Monitoring cases of fire incidents and the area of land burned.
- Monitor the condition of the signs and employees' understanding of the signs

Status: Nonconformity No. 2023.03 with Minor category.

3.2 Conformity Checklist of Certificate and Trademark Use

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

3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of First Resources Limited 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.

First Resources Limited Time Bound Plan (TBP) is explained in point 1.10. First Resources Limited has informed the TBP progress, MUTU has considered that First Resources Ltd is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by First Resources Limited in December 2021.

MUTU has verified partial certification for un-certified unit's subsidiary of First Resources Limited based on their Time Bound Plan. There are 33 subsidiaries of First Resources Limited. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from other sources.

MUTU Auditor has verified company partial certification and concludes that:

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Yes, positive assurance is produced for these units.</p> <p>Auditor verification There is internal audit produced for</p> <ul style="list-style-type: none"> - PT Limpa Sejahtera - PT Swadaya Mukti Prakarsa - PT Citra Agro Kencana - PT Borneo Ketapang Permai - PT Persada Instisawit Perkasa - PT Meridan Sejtisurya Plantation - PT Panca Surya Agrindo - PT Surya Intisari Raya - PT Swadaya Mukti Perkasa - PT Mitra Karya Sentosa <p>And positive assurance is produced for these units.</p>
2.1.2	<p>No replacement after dates defined in Nis Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<ul style="list-style-type: none"> • PT Limpa Sejahtera has identified HCV, with total HCV area 650.74 Ha. This company follow RaCP process. • PT Swadaya Mukti Prakarsa has identified HCV in 2014. This company follow RaCP process. • PT Mitra Karya Sentosa has identified HCV in 2010 and 2012. • PT Citra Agro Kencana has identified HCV in 2012. • PT Borneo Ketapang Permai has identified HCV in 2010, with total HCV area 303.64 Ha • PT Panca Surya Agrindo has identified the HCV area with total areal of 105.15 Ha

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> PT Meridan Sejatisurya Plantation has identified the HCV area with total areal of 167.13 Ha PT Persada Instisawit Perkasa has identified the HCV area with total areal of 33.15 Ha <p>The company has shown proof of delivery of disclosure to RSPO secretariat on August 12, 2014 and there has been a response on 23 June 2015 which explains that in PT SMP there is conservation liability with total area 27.3 Ha and PT GSI with total area 8 Ha.</p> <p>Auditor verification Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<ul style="list-style-type: none"> Planting years in PT Borneo Ketapang Permai consist of 2008 up to 2017. PT Citra Agro Kencana has follow NPP RSPO. PT Panca Surya Agrindo was built in 1990-2006 and there is no development after January 1, 2010 PT Meridan Sejatisurya Plantation was built in 1994-2005 and there is no development after January 1, 2010 PT Persada Instisawit Perkasa was built in 1993-2004 and there is no development after January 1, 2010 <p>Auditor verification Not all uncertified unit conduct new clearing after January 2010, detail information of uncertified unit is:</p> <ol style="list-style-type: none"> PT Borneo Ketapang Permai: there is new land clearing after January 2010 in and company does not conduct NPP. This is become subject of sanction. PT Swadaya Mukti Prakarsa has follow NPP and publish in 18 October 2014. PT Mitra Karya Sentosa has follow NPP and publish in 16 July 2014. PT Ketapang Agro Lestari has follow NPP and publish in 16 January 2013. PT Maha Karya Bersama has follow NPP and publish in 18 September 2012. PT Borneo Surya Mining Jaya has follow NPP and publish in 18 September 2012. PT Citra Agro Kencana has follow NPP and publish in 6 July 2012. PT Borneo Persada Energy Jaya has follow NPP and publish in 6 July 2012.
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.	There are no land conflicts. Company has had SOP about FPIC (FR.EAC.FPC) on 17 June 2013 for identified customary rights, communication and consultation during land acquisition. Beside that company also have SOP about conflict resolution (FR.CSPO.PL.008) on 2 August 2016.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		Auditor verification There is information from public source and RSPO website on any land conflict for uncertified unit of the group subsidiaries, consist of PT Mitra Karya Sentosa: complaint submit to RSPO in 2021 and still on investigation process.
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	There is no labor disputes. Company has developed Bipartite cooperation in each unit as a forum to find resolution if there is any workers issue. Beside that company also has had SOP of Communication (FR.EMS.CIE) on 24 February 2020 which explain about system to resolve complaint and grievance. Auditor verification There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries. There is no list of employee and stakeholder complaint and grievance.
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.	The subsidiaries of First Resources Limited has have register of SPO regulation and evaluated routinely. Auditor verification <ul style="list-style-type: none"> • PT Limpa Sejahtera has had HGU since 2009. • PT Swadaya Mukti Prakarsa has had HGU since 2005. • PT Mitra Karya Sentosa has had HGU since 2010. • PT Borneo Ketapang Permai has have HGU since 2014. • PT Perdana Intisawit Perkasa has have land use right in the document of HGU number 60/HGU/BPN/1995 on 1995 with total area is 2,467 Ha • PT Meridan Sejatisurya Plantation has have land use right in the document of HGU Certificate number 01 on 1995, Number 02 on 1995, Number 2 on 1996 and number 6 on 1999 with total area is 10,826.05 Ha • PT Panca Surya Agrindo has have land use right in the document of HGU number 42-VIII-1995 on 1995 and number 09/HGU/BPN.RI/2010 on 2010 with total area is 11,078.52 Ha

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

3.4.1 Identification of Findings, Corrective Actions and Observations at ASA-1 and ASA-2 Onsite

NCR No.	:	2021.01	Issued by	:	Haikal Ramadhan Kharismansyah
Date Issued	:	27 November 2021	Time Limit	:	ASA-3
NC Grade	:	Minor	Date of Closing	:	16 February 2023
Standard Ref. & Requirement	:	2.1.3 Proof of legal area boundaries are shown with clear and maintained boundary markings, and no planting has been carried out beyond these boundaries.			
Evidence observed (filled by auditor): <ul style="list-style-type: none">- Work Instruction Maintenance of boundary pole No. IK.PPH.01 dated December 6, 2018, among others, states that the monitoring and maintenance of boundary markings is carried out by each estate and is carried out once a year. For missing stakes, each estate is required to re-install it- Based on the results of field visits to PT SAM's HGU stakes No. 33 and No. 34, it was found that the stakes were missing.- Monitoring of boundary pole for SAM Estate has not been shown as stipulated in the Work Instructions					
Non-Conformance Description (filled by auditor): The unit of certification has not been able to show the boundaries of the legal area with clear boundaries that have been maintained in accordance with the stipulated Work Instructions					
Root Cause Analysis (filled by organization audited): Estate and Civil Team did not conduct monitoring in detail of HGU stakes installed.					
Correction (filled by organization audited): Civil Team has installed HGU pole No. 33 and No. 34 in accordance with determined coordinate in the field.					
Corrective Action (filled by organization audited): Civil Team has shown HGU pole monitoring report of SAM estate routinely.					
Assessor Evaluation and Conclusion (filled by auditor):					
Verification on ASA-3 Assessment The company has a map that showing the location of the boundary poles in each estate. The company has also monitored HGU boundary pole in December 2022 by showing the results of monitoring record "Laporan Pemeriksaan Pal Batas HGU", in accordance with the maintenance procedures (WI.PPH.01, 6 August 2022). The results of field observations on the boundary pole for example No. 57 & 58 (Subur Arum Makmur Estate), No. IX & IX A (Petapahan-2 Estate) and No. III, 131, II & 13 (Petapahan-1 Estate) are found and that the condition of the boundary poles is well maintained.					
Based on that objective evidence, the non-conformities have been fulfilled.					
Verified by	:	Briyogi Shadiwa			

NCR No.	:	2021.02	Issued by	:	Haikal Ramadhan Kharismansyah
Date Issued	:	27 November 2021	Time Limit	:	25 February 2022
NC Grade	:	Major	Date of Closing	:	13 February 2022
Standard Ref. & Requirement	:	3.6.1. All operational activities risks assessed to identify the H&S issues. Mitigation			

	plans and procedures are documented and implemented.
<p>Evidence observed (filled by auditor):</p> <p>1. Not all activities are listed in HIRAC</p> <ul style="list-style-type: none"> Revision of PT SAM's Hazard Identification, Assessment, and Risk Control Document for the 2021 period which was carried out during the audit activity and did not include a risk analysis of the following activities : <ul style="list-style-type: none"> Operation of lift and transport aircraft at mill Visits in the mill area (eg visitor lines, potential hazards during visits, etc.) Transportation of harvesters to the workplace and transfer of harvesters and harvesting equipment. Fertilizer preparation activities in the warehouse Activities for preparing pesticides in warehouses, risk of spills, etc Transportation of spray workers to the field WWTP Barn Owl Nest check Emergency response activities and facilities at Temporary Hazardous Waste Shelter SOP for Hazard Source Identification, Assessment, and Risk Control approved by the CEO, with an effective date of 01 September 2017 stating the purpose of the procedure for identifying all existing hazard sources arising from all company activities. Government Regulation number 50 of 2012 article 7(2) conducts an initial review of OHS conditions including identification of potential hazards, assessment, and risk control. <p>2. There is an inaccuracy of the potential hazards identified with the description of the activity (work location) for example for the description of activities in the oil warehouse and pesticide warehouse.</p> <p>Non-Conformance Description (filled by auditor):</p> <ol style="list-style-type: none"> The company has not been able to show sufficient evidence that risk identification has been carried out for all company activities in accordance with the established procedures. The company has not been able to show sufficient evidence that the results of the risk assessment carried out are in accordance with the description of activities. 	
<p>Root Cause Analysis (filled by organization audited):</p> <p>OHS PIC is not careful in updating the identification and risk assessment in the company.</p>	
<p>Correction (filled by organization audited):</p> <p>The company shows the results of the latest risk assessment identification.</p>	
<p>Corrective Action (filled by organization audited):</p> <p>OSH PIC conducts identification and evaluation of risk assessment together with P2K3 management every year</p>	
<p>Assessor Evaluation and Conclusion (filled by auditor):</p> <p>Auditor Verification January 31, 2022</p> <p>The company has submitted the root of the problem, corrections, and corrective actions that have been accepted. The company shows evidence of improvement, as follows:</p> <ol style="list-style-type: none"> Group Manager Internal Memo dated November 29, 2021 regarding confirmation of standards for the use of PPE at PT ATS. Meanwhile, PT SAM does not yet exist. News of the circular socialization of the use of PPE for PT ATS on November 29, 2021, along with documentation of socialization to Afdeling 1 PT ATS housing and PT ATS employees. Meanwhile, PT SAM Plantation and POM employees do not yet exist. ISBPPR Document (Identification of Hazard Sources, Assessment, and Risk Control-HIRARC) for PT SAM's plantation for the period January – December 2022, which has been identified by the Foreman, Assistant, and Evaluation Division; made by the Secretary of P2K3, and ratified by the Chair of P2K3. This document has discussed the transportation of harvests, preparation of fertilizers, preparation of pesticides, transportation of spray workers, and inspection of Gupon. 	

4. PT SAM POM HIRARC document for the period January – December 2022, which has been identified by the Foreman, Assistant, and Evaluation Division; made by the Secretary of P2K3, and ratified by the Chair of P2K3, but there is still information that is not appropriate, such as:
- **Some of the HIRARC SAM POM locations are in estates, such as laboratories, WTP areas, WWTPs, bunch press stations, storage & delivery of CPO Kernels.**
 - **Description of activities in the POM Boiler, such as filling FFB in fruitcages, pulling sling cables, etc.**
 - **HIRARC for POM area visits does not yet exist.**

Based on the evidence above, the non-conformance is declared not fulfilled.

Verification on 13 February 2022

The company shows additional proof of improvement in the form of;

- Internal memo of the Group Manager number GM/ME/03/XI/2021 dated November 29, 2021, regarding the affirmation of standards for the use of PPE at PT SAM.
- Training/socialization report documents, including:
 - Waste management at PT SAM Afdeling 1 housing estate on 09 February 2022.
 - PPE and first aid functions at PT SAM estate on 10 February 2022.
 - PPE management, Hazardous and Toxic Material waste management, fertilizer limit and spray limit
 - PPE and first aid functions at PT SAM POM on December 23, 2021.
 - PPE management, Hazardous and Toxic Material waste management, fertilizer limit and spray limit at Spraying Team House (Afdeling Housing).
- PT SAM POM HIRARC document for the period January – December 2022, updated on February 10, 2022 which has been repaired in the laboratory, WTP area, WWTP, bunch press station, stockpiling & shipping of CPO Kernel, boiler, and visiting area.

Auditor Conclusion :

Based on the observed evidence, it is concluded that the nonconformity has been comply

Verified by : Haikal Ramadhan Kharismansyah

NCR No.	:	2021.03	Issued by	:	Haikal Ramadhan Kharismansyah
Date Issued	:	27 November 2021	Time Limit	:	25 February 2022
NC Grade	:	Major	Date of Closing	:	13 February 2022
Standard Ref. & Requirement	:	3.7.1. A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender-specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training			
Evidence observed (filled by auditor):					
1. Compliance with mandatory competence					
<ul style="list-style-type: none">The results of field observations and document review. Type and Operator license number, it is known that SAM POM has 2 loaders and a welder who has not been shown an OHS license.Regulation of the Minister of Manpower number 8 of 2020 concerning K3 Lifting and Transport Aircraft, Chapter on Personnel article 140 states that use or operation must be carried out by personnel who have competence as evidenced by a certificate.Regulation of the Minister of Manpower and Transmigration number 2 of 1982 concerning the qualification of welders in the workplace, article 5 describes welding activities carried out by Certified Welders					
2. Understanding of workers related to the socialization/training that has been provided					

- Field observations and interviews revealed that workers have not been able to properly explain several things as follows: :
 - Completeness and function of items in a first aid bag/box (harvest foreman & SAM warehouse clerk; Petapahan-2 warehouse clerk)
 - Understanding of hazardous and toxic material and its waste symbol (Petapahan-1 and SAM warehouse officers)
 - Understanding of the gender committee
 - Understanding of domestic waste management without burning (SAM)
 - Understanding in the management of hazardous and toxic chemicals including waste generated
 - Understanding of spray limits and fertilizer limits (eg in river border areas)

Non-Conformance Description (filled by auditor):

1. The certification unit has not been able to show the OHS license 83ulfilment program according to regulations, for example the Wheel Loader Operator (PAA) and Welder OHS license
2. The unit of certification has not been able to show sufficient evidence that the socialization or training provided has been carried out effectively and is understood by the workers

Root Cause Analysis (filled by organization audited):

1. The company experienced a delay in the implementation of the OHS license certification which had to be done offline due to the pandemic (PPKM)
2. Head of Administration and personnel do not monitor and evaluate the effectiveness of the training/socialization conducted to employees.

Correction (filled by organization audited):

1. Company shows certification for wheel loader operator at SAM PPM and proof of registration for SAM POM welder certification
2. The company demonstrates the realization of training and evaluation of the effectiveness of the socialization process to employees

Corrective Action (filled by organization audited):

1. The OSH PIC monitors the operator's OHS license requirements in the company at the annual SMK3 meeting.
2. Head of Administration and personnel update employee training both internally/externally.

Assessor Evaluation and Conclusion (filled by auditor):
Auditor Verification January 31, 2022

The company has submitted the root of the problem, corrections, and corrective actions that have been accepted. The company shows evidence of improvement, as follows:

1. PT Arpindo Multi Utama PJK3 statement letter dated December 13, 2021 regarding the registration of PT SAM welding officers with the initials SBP as a Class III Welder OHS coaching participant.
2. Certificate of participation in Wheel Loader Operator OHS coaching for employees with the initials SPL through PJK3 PT Arpindo Multi Utama on 09-12 December 2021, but certificates from the Ministry and license have not been shown.
3. Monitoring of PT SAM license operator, which informs 10 SAM POM license operator, 1 plantation license operator, and 1 waiting process for training.
4. Training/Socialization Evaluation Documents, including the following::

Training/Socialization	Implementation	Evaluation	Evaluation Result
• PT SAM domestic and hazardous waste handling	20-21 Dec 21	21 Dec 21	Note: when training, holding containers used for Roundup pesticides, do not use PPE, rubber gloves and masks according to HIRARC of regarding Hazardous and Toxic Material waste
• PT ATS domestic and hazardous waste handling	29 Nov 21	09 Dec 21	20 participants meet competence

• First aid training, meaning of PT SAM Hazardous and Toxic Materials and its waste symbols	20-21 Dec 21	21 Dec 21	19 participants meet competence
• PT ATS gender committee 1	14 Dec 21	23 Dec 21	6 participants meet competence
• PT ATS gender committee 2	01 Dec 21	08 Dec 21	5 participants meet competence
• PT SAM gender committee 1	28 Dec 21	28 Dec 21	12 participants meet competence
• First aid training for ATS warehouse officers 2	01 Dec 21	08 Dec 21	3 participants meet competence
• HCV management: PT SAM spray limit, fertilizer, wildlife	14 Jan 22	14 Jan 22	Note: the spray workers do not wear long clothes , which is not in accordance with the estate HIRARC
• PT ATS HCV Management	01 Dec 21		

Based on the evidence shown, the non-conformance was declared unfulfilled, according to the training records that have been shown.

Verification on 13 February 2022

The company shows additional proof of improvement in the form of;

Documents of training/socialization reports, including:

- Waste management at PT SAM Afdeling 1 housing estate on 09 February 2022, with the presenters using appropriate PPE such as face shields and rubber gloves and long sleeves when handling Hazardous and Toxic Material Waste.
- PPE and first aid functions at PT SAM estate on 10 February 2022
- PPE and first aid function at PT SAM PKS on 23 December 2021.
- PPE management at Spraying Team House, Hazardous and Toxic Material Waste management, fertilizer limit and spray limit at PT SAM on 10 February 2022. In the documentation it is known that all spray workers use PPE in accordance with long sleeves and rubber gloves, both participants and presenters.

Based on the observed evidence, it is concluded that the nonconformity has been comply

Verified by : **Haikal Ramadhan Kharismansyah**

NCR No.	:	2021.04	Issued by	:	Haikal Ramadhan Kharismansyah
Date Issued	:	27 November 2021	Time Limit	:	25 February 2022
NC Grade	:	Major	Date of Closing	:	15 February 2022
Standard Ref. & Requirement	:	6.7.3 Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.			
Evidence observed (filled by auditor): <ul style="list-style-type: none">Based on field observations found the following facts: :<ul style="list-style-type: none">Safety Shoes are not used in the sterilizer panel area.Safety helmet is not worn when operating the Wheel loader.					

- No gloves found at Kernel station.
- Do not wear safety shoes when welding
- The spray foreman does not use a mask and apron in accordance with HIRAC at Petapahan-1
- Spray workers do not use long sleeves and head coverings according to the Petapahan-1 Estate
- Workers use damaged safety shoes at the sorting station, Kernel, Boiler, and 2 Mechanics at Petapahan-1 Plantation
- No spraying team PPE was found at PT SAM rinse house, but information from management representatives said that PPE was sprayed on spraying team car.
- No PPE fertilizer was found in the Petapahan-1 rinse house. According to information from the Petapahan-1 management representative, the fertilizer team's PPE was brought to the house.
- Fertilizer workers do not wear Aprons according to PPE SOPs.
- Eye shower and Body shower at Hazardous and Toxic Waste shelter in Petapahan-1 don't work
- Based on interviews with workers revealed that workers understand the importance of PPE, but they are not used, among others, because they want to maintain cleanliness and lack of compliance.
- Based on interviews with workers revealed that workers wearing PPE were damaged because some stated that it was not yet time for replacement and some were waiting for replacement.
- Documents for Hazard Source Identification, Assessment, and Risk Control for PT SAM (PKS and Kebun) and PT ATS for the period January-December 2021, which were made by the P2K3 Secretary, have not explained the PPE used in each work that has been identified.
- The PPE SOP approved by the CEO and effective October 1, 2019 regulates PPE for spraying and fertilizer activities, as well as storing the PPE in the rinse house.

Non-Conformance Description (filled by auditor):

Unit of certification has not been able to show proof of:

1. Workers have used appropriate PPE according to the results of the risk analysis as described in the HIRAC document and PPE SOP.
2. PPE storage is in accordance with existing procedures.

Root Cause Analysis (filled by organization audited):

1. Lack of employee understanding of the importance of PPE when doing work in the field
2. Lack of supervision from foremen and assistants regarding PPE for field workers

Correction (filled by organization audited):

1. The company shows the provision of new PPE and repairs of damaged employee PPE
2. Farm managers and assistants ensure that PPE is stored in accordance with established procedures

Corrective Action (filled by organization audited):

1. The GM of the estate makes an internal memo regarding the use and storage of PPE for employees.
2. The estate manager socializes the use of PPE in the company environment

Assessor Evaluation and Conclusion (filled by auditor):
Auditor Verification January 31, 2022

The company has conveyed the root of the problem, correction, and corrective action with a note, namely How are corrections and corrective actions for non-conformities that occur in POM?

The company also shows evidence of improvement:

1. Internal memo from the GM of the Plantation to the Spray and Fertilizer Team of PT SAM and ATS on 06 and 01 December 2021 regarding the mandatory use of PPE such as masks, gloves, aprons, boots, protective helmets/face shields. After work, all work equipment and PPE must be stored back in the spraying team house/goods storage area that has been provided and may not be taken home. All spray employees must rinse their bodies in the washroom at spraying team house and return home clean.
2. Mill Manager's internal memo dated November 24, 2021, regarding the affirmation of standards for the use of PPE in POM, which if you don't wear PPE, you are not allowed to enter POM, and guests can borrow at the

security post.

3. News of the circular socialization of the use of PPE at PT ATS on November 29, 2021.
4. Socialization of PPE circulars and SOPs at PT SAM on 28 December 2021, however, **there are still spray workers wearing short sleeves.**
5. Minutes of repair of eye shower and body shower at TPS LB3 PT ATS on November 26, 2021
6. Minutes of PPE handover documents, such as:
 - Kernel officer: heat-resistant gloves and safety shoes on 26 November 2021
 - Mechanics: safety shoes on 26 November 2021
 - Boiler attendant: safety shoes on 26 November 2021
 - Sorting officer: safety shoes on 26 November 2021
 - Sterilizer staff: safety shoes on 26 November 2021
 - On 01 December 2021 PT ATS fertilizer team: safety helmet, gloves, protective clothing, boots, and masks.
 - PT ATS mechanic: safety shoes on November 30, 2021
 - On 15 June 2021, the PT ATS team sprayed: face helmets, rubber gloves, boots, masks, and aprons.

Based on notes on corrections and corrective actions, as well as the presence of workers wearing short sleeves when spraying, it was concluded that the discrepancy **still open**.

Verification on 15 February 2022

The company shows proof of improvement in the form of root causes, revisions to corrections, and revisions of corrective actions that have been accepted. The company also adds proof of improvement in the training/socialization report document, including:

- Waste management at PT SAM Afdeling 1 housing estate on 09 February 2022, with the presenters using appropriate PPE such as face shields and rubber gloves and long sleeves when handling Hazardous and Toxic Material Waste.
- PPE management at TUS's house, Hazardous and Toxic Material Waste management, fertilizer limit and spray limit at PT SAM on 10 February 2022. In the documentation it is known that all spray workers use PPE in accordance with long sleeves and rubber gloves, both participants and presenters.

Based on the observed evidence, it is stated that the nonconformity has been comply.

Verified by : **Haikal Ramadhan Kharismansyah**

NCR No.	:	2021.05	Issued by	:	Haikal Ramadhan Kharismansyah
Date Issued	:	27 November 2021	Time Limit	:	25 February 2022
NC Grade	:	Major	Date of Closing	:	31 January 2022
Standard Ref. & Requirement	:	7.2.7 Storage of all pesticides in accordance with recognized best practices.			
Evidence observed (filled by auditor):					
<ul style="list-style-type: none">Based on field observations to Petapahan-2 revealed that Ratkill (Rodenticide) is not stored in a pesticide warehouse and has not been equipped with the Hazardous and Toxic Material symbol and MSDS.SOP on the Use of Pesticides, the chapter on Safe Storage for preventive measures regulates, among others, the Hazardous and Toxic Material symbol, and the MSDS of pesticides must be in the storage warehouse.					
Non-Conformance Description (filled by auditor):					
The company has not been able to show sufficient evidence that the storage of all pesticides is in accordance with the best practices set out in the procedures.					
Root Cause Analysis (filled by organization audited):					
Warehouse employees do not understand the pesticide storage procedures that have been set by the company					

Correction <i>(filled by organization audited):</i> Warehouse employees move the pesticides in question into the pesticide warehouse and complete with MSDS	
Corrective Action <i>(filled by organization audited):</i> 1. KTU periodically conducts stock taking related to pesticide storage conditions in the central warehouse 2. KTU conducts socialization of chemical storage according to the procedures set by the company to employees of the ATS2 plantation warehouse	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Auditor Verification January 31, 2022: The company has submitted the root of the problem, corrections, and corrective actions that have been accepted. The company shows evidence of improvement, as follows: 1. Minutes of the transfer of 616 kg of Ratkill pesticides from the spare parts warehouse to the chemical warehouse on December 13, 2021, and has been equipped with MSDS. 2. Socialization of the understanding of Hazardous and Toxic Materials and its waste symbols at PT ATS on November 29, 2021. Based on the evidence, the non-conformance is declared to have been fulfilled.	
Verified by	: Haikal Ramadhan Kharismansyah

NCR No.	: 2021.06	Issued by	: Radytio Puspanjana
Date Issued	: 27 November 2021	Time Limit	: ASA-3/18 May 2023
NC Grade	: Minor/Minor Raised to Major	Date of Closing	: 13 April 2023
Standard Ref. & Requirement	7.3.2 : Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Evidence observed (filled by auditor):			
<ul style="list-style-type: none">- The company has an SOP for waste management with number FR.CSM.OP.1 with an issue date of 30 December 2018 which explains that B3 waste generated by operational activities such as used B3 contaminated packaging, used/damaged pesticide sprayers, used fertilizer sacks and balls TL lamps are stored in the Hazardous Waste Temporary Storage.- As a result of the field visit during the onsite audit Asa-1 was carried out, information was obtained that the B3 waste was not located in a licensed place, for example:<ul style="list-style-type: none">• There is hazardous and toxic waste Used oil drums for water storage (Petapahan-2 housing)• There is hazardous and toxic waste used for fertilizer sacks (Petapahan-2)• There is hazardous and toxic waste used for fertilizer sacks (outside & inside of the fertilizer sacks) in the warehouse until (Petapahan-1)• There is hazardous and toxic waste used for pesticide packaging stored in the spare parts warehouse (jeirigen garlon, metsulindo, etc).• There is hazardous and toxic waste from used pesticide packaging used as a water reservoir in the engine room where the vehicle is washed (Petapahan-1).• There is hazardous and toxic waste from used pesticide packaging and used filters disposed of behind the vehicle wash area (PETAPAHAN-1).• There is hazardous and toxic waste in the form of spilled oil behind the Petapahan-2 generator house.• There is hazardous and toxic waste of used pesticide sprayers stored in the PPE storage warehouse.			

- There is hazardous and toxic waste from used pesticide packaging and used TL lamps disposed of behind the WWTP pond pump house.
- There is hazardous and toxic waste, used gloves contaminated with oil are disposed of in the PKS SAM bin.

Non-Conformance Description (filled by auditor):

The company has not been able to show sufficient evidence that the management of hazardous and toxic waste is in accordance with the established procedures.

Root Cause Analysis (filled by organization audited):

Lack of monitoring by unit managers in implementing hazardous toxic and waste management as a whole in the plantation area

Correction (filled by organization audited):

The unit manager demonstrates hazardous toxic and waste management at the plantation and housing operational locations

Corrective Action (filled by organization audited):

The unit manager conducts ongoing outreach regarding hazardous toxic and waste management to employees

Assessor Evaluation and Conclusion (filled by auditor):
Auditor Verification in ASA-3 (17 February 2023)

Based on the results of a field visit to PT Subur Arum Makmur and PT Arindo Trisejahtera, the following was found:

- Household waste scattered in front of and behind the Employee Housing Afdeling I, Afdeling VII, Afdeling VIII and the elementary school in Subur Arum Makmur Estate of PT Subur Arum Makmur.
- There are drums of used oil left on the side of the house in Employee Housing Afdeling I Subur Arum Makmur Estate PT Subur Arum Makmur.
- There is waste of used oil drums used for water storage at PT Arindo Trisejahtera's Petapahan-1 Estate.
- The results of interviews with residents of the Afdeling VIII employee housing complex show differences in the transportation periods, such as 1 time a week, 2 times a week, the householders themselves transport the waste to the landfill, or leave the waste uncollected.
- Results of interviews with management representatives at PT Subur Arum Makmur, domestic waste is managed by transporting it from the employees' housing to landfill. The waste collection period in employee housing in each Afdeling differs from one another according to the policies of each Afdeling.
- Training/Socialization Report Documents related to the handling of organic, non-organic and hazardous and toxic waste on December 13, 2022 which was carried out for 25 participants of PT Arindo Trisejahtera II workers and December 15, 2022 which was carried out for 11 participants of PT Arindo Trisejahtera I workers
- Training/Socialization Report Documents related to the handling of organic, non-organic and hazardous and toxic waste on December 5, 2022 which was carried out for 16 workers of PT Subur Arum Makmur.
- Minutes of PT Subur Arum Makmur PKS socialization document on 12 September 2022 regarding hazardous and toxic waste management which was attended by 18 workers at PT Subur Arum Makmur POM.
- Waste Management SOP Document No. FR.CSM.OP.1 with a published date of 30 December 2018 which explains the following:
 - Point 3.3.2 which explains that domestic solid waste (housing, plantations, etc.) is carried out by providing adequate trash bins. The collected waste is disposed of in the landfill.
 - Point 3.3.1 which explains that B3 waste generated by operational activities such as used B3 contaminated packaging, used/damaged pesticide sprayers, used fertilizer sacks and TL light bulbs are stored in the Hazardous and Toxic Waste Waste Temporary Storage.

Until the assessment is carried out, the unit of certification has not been able to show evidence that the management of hazardous and toxic waste and household waste is in accordance with the stipulated procedures. Thus, the nonconformity in this indicator has not been fulfilled. Therefore, nonconformity **No. 2021.06 has changed to Minor raised to Major Major category.**

Root Cause Analysis (filled by organization audited):

- Lack of monitoring assistants in implementing hazardous and toxic waste management in housing complex.

<ul style="list-style-type: none"> • There is no person in charge of cleanliness in each housing location • Lack of awareness from housing residents regarding the cleanliness and health of the housing complex.
<p>Correction (filled by organization audited):</p> <p>The garden assistant shows evidence of corrective actions for handling hazardous and toxic waste and domestic waste in the housing complex Afdeling. The company also shows proof as showed below:</p> <ul style="list-style-type: none"> • Documentation and schedule for waste transportation in housing complex. • Evidence of transporting hazardous and toxic waste to hazardous and toxic waste temporary storage. • Documentation of environmental hygiene activities.
<p>Corrective Action (filled by organization audited):</p> <ul style="list-style-type: none"> • The estate's assistant conducts socialization on an ongoing basis regarding the management of hazardous and toxic waste and domestic waste to employees. • The estate's assistant carries out ongoing socialization regarding the management of hazardous and toxic waste and domestic waste to employees. • The GM of the Plantation determines the person responsible for cleaning the housing in each housing and conducts monitoring every 6 months.
<p>Assessor Evaluation and Conclusion (filled by auditor):</p> <p>Auditor Verification (31 March 2023)</p> <p>The unit of certification has conducted a root cause analysis and determined corrections and corrective actions. However, the verification results show that there are still auditor responses that still need to be answered and evidence of corrective documents that need to be attached by the management unit. Thus, the nonconformity on this indicator has not been fulfilled.</p> <p>Auditor Verification (09 April 2023)</p> <p>The unit of certification has shown the following documents:</p> <ul style="list-style-type: none"> • Documentation of environmental cleaning activities and socialization of organic and inorganic waste management as well as B3 waste which was attended by 25 participants, including housing residents, at PT Arindo Trisejahtera on 27 February 2023. • Documentation of environmental cleaning activities and socialization of organic and inorganic waste management as well as hazardous and toxic waste which was attended by 28 participants, including housing residents, at PT Subur Arum Makmur on 25 March 2023. • Schedule for Garbage Transport from the housing in each PT Subur Arum Makmur housing, namely the POM and Estate Housing, which is carried out once a week in each housing. For example, garbage collection in PT Subur Arum Makmur's Afdeling 1 housing complex is carried out on Saturdays every week. Waste transportation is categorized into 3 types, namely domestic waste, hazardous solid waste and hazardous liquid waste, where domestic waste will be transported to the Final Disposal Site while hazardous waste is transported to the hazardous and toxic waste temporary storage. The transportation schedule was approved on 27 February 2023 by the Group Manager. However, the transport schedule for PT Arindo Trisejahtera's Petapahan-1 Estate has not been shown. • Minutes of handing over of hazardous and toxic waste dated 28 February 2023 from PT Arindo Trisejahtera's Afdeling II Petapahan I Estate in the form of 2 units of oil drums to the hazardous and toxic waste temporary storage. • Minutes of handing over of hazardous and toxic waste dated March 25, 2023, from Afdeling I Housing at Subur Arum Makmur Estate of PT Arindo Trisejahtera in the form of 2 units of oil drums to the hazardous and toxic waste temporary storage. • Appointment of Transportation Responsible for Housing Cleaning Letter No. 011/SAM-SN/III/2023 stipulated by the Plantation Group Manager on March 4, 2023. The document stipulates a cleanliness monitoring coordinator for the 2023 period, namely Afdeling Assistant, at PT Subur Arum Makmur in every housing in PT Subur Arum Makmur. However, the determination of the person responsible for housing cleanliness for PT Arindo Trisejahtera's Petapahan-1 Estate has not yet been shown. <p>Based on the results of the explanation above, there is an auditor's response that needs to be explained by the unit of certification in the corrective action column. In addition, the unit of certification has yet to show documents regarding</p>

the schedule for waste transportation and the determination of the person in charge of cleanliness in the Petapahan I housing complex of PT Arindo Trisejahtera. Thus, the nonconformity on this indicator has not been fulfilled.

Auditor Verification (13 April 2023)

The unit of certification has shown evidence of improvement as follows:

- Schedule of Hygiene Dissemination of PT Arindo Trisejahtera and PT Subur Arum Makmur for the 2023 period which was made in March 2023 by the Training/Counselling Sector every 2 times a year including the classification of types of residential waste/waste and B3 waste.
- Schedule of Garbage Transport from the housing in each PT Arindo Trisejahtera housing, which is carried out once a week in each housing. For example, garbage collection at PT Arindo Trisejahtera Afdeling 1 Housing Complex is carried out on Saturdays every week. Waste transportation is categorized into 3 types, namely domestic waste, hazardous solid waste and hazardous liquid waste, where domestic waste will be transported to the Final Disposal Site while hazardous waste is transported to the hazardous and toxic waste temporary storage. The transportation schedule was approved on March 3, 2023, by the Group Manager.
- Residential Cleaning Inspection Card in Afdeling II PT Arindo Trisejahtera Petapahan-1 Estate Year 2023 and Housing Afdeling I, VII and VIII PT Subur Arum Makmur Subur Arum Makmur Estate which is carried out monthly by the Afdeling Assistant and reviewed every 6 months with the GM of the Estates. The inspection results in March 2023 showed that there were no traces of burning waste, there were no used hazardous and toxic waste packaging, and there were still waste management banners at Afdeling II Housing Complex PT Arindo Trisejahtera Petapahan-1 Estate Year 2023 and Housing Afdeling I, VII and VIII Subur Arum Makmur Estate.
- Appointment of Transportation Responsible for Housing Cleaning Letter No. 017/ATS-PTPH/III/2023 stipulated by the Plantation Group Manager on March 7, 2023. The document stipulates a cleanliness monitoring coordinator for the 2023 period, namely Afdeling Assistant at PT Arindo Trisejahtera in every housing in PT Arindo Trisejahtera.

Based on the results of the explanation above, the unit of certification has carried out a root cause analysis and determined corrections and corrective actions as well as shown an attachment to proof of improvement. Thus, the nonconformity on this indicator is declared to have been fulfilled.

Verified by : **Erika Lucitawati**

NCR No.	: 2021.07	Issued by	: Radytio Puspanjana
Date Issued	: 27 November 2021	Time Limit	: ASA-3/18 May 2023
NC Grade	: Minor/Minor Raised to Major	Date of Closing	: 13 April 2023
Standard Ref. & Requirement	7.3.3 The unit of certification does not use open fire for waste disposal		
Evidence observed (filled by auditor):			
<ul style="list-style-type: none">- The company has procedures for waste management without burning contained in the SOP for waste management with number FR.CSM.OP.1 with a date of issue December 30 2018. Based on the results of interviews and document review, it is stated that the company does not use open burning for waste disposal.- The results of field visits and interviews with workers during the onsite audit ASA-1 were carried out, there were employees burning domestic waste (household waste) in the open.- The company has prepared a garbage collection schedule, for example in Petapahan-2 which explains the garbage collection schedule on Mondays, Tuesdays, Wednesdays, Thursdays and Fridays. For example, for November 2021, in week 3, information was obtained that garbage in staff housing & offices, sections 1-4 had been transported and disposed of at the final landfill.			

<p>Non-Conformance Description (filled by auditor):</p> <p>The company has not been able to show sufficient evidence that in carrying out waste management it has thoroughly not used open burning for its destruction.</p>
<p>Root Cause Analysis (filled by organization audited):</p> <p>Lack of monitoring of unit managers in implementing domestic waste management</p>
<p>Correction (filled by organization audited):</p> <p>The unit manager demonstrates integrated waste management at the plantation and residential operational locations by implementing the separation of organic and inorganic waste.</p>
<p>Corrective Action (filled by organization audited):</p> <p>The unit manager conducts ongoing outreach regarding hazardous toxic and waste management to employees</p>
<p>Assessor Evaluation and Conclusion (filled by auditor):</p> <p>Auditor Verification (17 February 2023)</p> <p>Based on the results of a field visit to PT Subur Arum Makmur and PT Arindo Trisejahtera, the following was found:</p> <ul style="list-style-type: none"> • Trash burned behind the Employee Housing Afdeling I, Afdeling VII, Afdeling VIII and the elementary school in Subur Arum Makmur Estate of PT Subur Arum Makmur. In addition, each housing has a board warning against burning garbage in housing and all estate. • The results of interviews with residents of the Afdeling VIII employee housing complex show differences in the transportation periods, such as 1 time a week, 2 times a week, the householders themselves transport the waste to the landfill, or leave the waste uncollected. • Results of interviews with management representatives at PT Subur Arum Makmur, domestic waste is managed by transporting it from the employees' housing to landfill. Domestic waste management is prohibited from burning. • Training/Socialization Report Documents related to the handling of organic, non-organic and hazardous and toxic waste on December 13, 2022 which was carried out for 25 participants of PT Arindo Trisejahtera II workers and December 15, 2022 which was carried out for 11 participants of PT Arindo Trisejahtera I workers • Training/Socialization Report Documents related to the handling of organic, non-organic and hazardous and toxic waste on December 5, 2022 which was carried out for 16 workers of PT Subur Arum Makmur. • Internal Circular Document No. SE-INT/SAM-1/005/I/2022 regarding the Cleanliness of the Residential Environment which was approved by GM PT SAM 1 on January 11 2022. The document shows that there is a prohibition against littering both in residential areas or throughout the PT SAM 1 plantation area and a ban on dumping garbage. <p>Until the assessment is carried out, the unit of certification has not been able to show evidence that the management of hazardous and toxic waste and household waste is in accordance with the established policies. Thus, the nonconformity in this indicator has not been fulfilled. Therefore, nonconformity No. 2021.07 has changed to Minor raised to Major category.</p>
<p>Root Cause Analysis (filled by organization audited):</p> <ul style="list-style-type: none"> • Lack of monitoring assistants in implementing hazardous and toxic waste management in housing complex. • There is no person in charge of cleanliness in each housing location • Lack of awareness from housing residents regarding the cleanliness and health of the housing complex.
<p>Correction (filled by organization audited):</p> <p>The estate assistant shows evidence of corrective actions for handling hazardous and toxic waste and domestic waste in the housing complex Afdeling. The company also shows proof as showed below:</p> <ul style="list-style-type: none"> • Documentation and schedule for waste transportation in housing complex. • Evidence of transporting hazardous and toxic waste to hazardous and toxic waste temporary storage. • Documentation of environmental hygiene activities.
<p>Corrective Action (filled by organization audited):</p> <ul style="list-style-type: none"> • The estate's assistant conducts socialization on an ongoing basis regarding domestic waste management and the ban on burning waste to employees. • The estate's assistant carries out ongoing socialization regarding the management of hazardous and toxic waste and domestic waste to employees. • The GM of the Plantation determines the person responsible for cleaning the housing in each housing and

conducts monitoring every 6 months.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification (31 March 2023)

The unit of certification has conducted a root cause analysis and determined corrections and corrective actions. However, the verification results show that there are still auditor responses that still need to be answered and evidence of corrective documents that need to be attached by the management unit. Thus, the nonconformity on this indicator has not been fulfilled.

Auditor Verification (09 April 2023)

The unit of certification has shown the following documents:

- Documentation of environmental cleaning activities and socialization of organic and inorganic waste management as well as B3 waste which was attended by 25 participants, including housing residents, at PT Arindo Trisejahtera on 27 February 2023.
- Documentation of environmental cleaning activities and socialization of organic and inorganic waste management as well as hazardous and toxic waste which was attended by 28 participants, including housing residents, at PT Subur Arum Makmur on 25 March 2023.
- Schedule for Garbage Transport from the housing in each PT Subur Arum Makmur housing, namely the POM and Estate Housing, which is carried out once a week in each housing. For example, garbage collection in PT Subur Arum Makmur's Afdeling 1 housing complex is carried out on Saturdays every week. Waste transportation is categorized into 3 types, namely domestic waste, hazardous solid waste and hazardous liquid waste, where domestic waste will be transported to the Final Disposal Site while hazardous waste is transported to the hazardous and toxic waste temporary storage. The transportation schedule was approved on 27 February 2023 by the Group Manager. However, the transport schedule for PT Arindo Trisejahtera's Petapahan-1 Estate has not been shown.
- Minutes of handing over of hazardous and toxic waste dated 28 February 2023 from PT Arindo Trisejahtera's Afdeling II Petapahan I Estate in the form of 2 units of oil drums to the hazardous and toxic waste temporary storage.
- Minutes of handing over of hazardous and toxic waste dated March 25, 2023 from Afdeling I Housing at Subur Arum Makmur Estate of PT Arindo Trisejahtera in the form of 2 units of oil drums to the hazardous and toxic waste temporary storage.
- Appointment of Transportation Responsible for Housing Cleaning Letter No. 011/SAM-SN/III/2023 stipulated by the Plantation Group Manager on March 4, 2023. The document stipulates a cleanliness monitoring coordinator for the 2023 period, namely Afdeling Assistant, at PT Subur Arum Makmur in every housing in PT Subur Arum Makmur. However, the determination of the person responsible for housing cleanliness for PT Arindo Trisejahtera's Petapahan-1 Estate has not yet been shown.

Based on the results of the explanation above, there is an auditor's response that needs to be explained by the unit of certification in the corrective action column. In addition, the unit of certification has yet to show documents regarding the schedule for waste transportation and the determination of the person in charge of cleanliness in the Petapahan I housing complex of PT Arindo Trisejahtera. Thus, the nonconformity on this indicator has not been fulfilled.

Auditor Verification (13 April 2023)

The unit of certification has shown evidence of improvement as follows:

- Schedule of Hygiene Dissemination of PT Arindo Trisejahtera and PT Subur Arum Makmur for the 2023 period which was made in March 2023 by the Training/Counselling Sector every 2 times a year including the classification of types of residential waste/waste and B3 waste.
- Schedule of Garbage Transport from the housing in each PT Arindo Trisejahtera housing, which is carried out once a week in each housing. For example, garbage collection at PT Arindo Trisejahtera Afdeling 1 Housing Complex is carried out on Saturdays every week. Waste transportation is categorized into 3 types, namely domestic waste, hazardous solid waste and hazardous liquid waste, where domestic waste will be transported to the Final Disposal Site while hazardous waste is transported to the hazardous and toxic waste temporary storage. The transportation schedule was approved on March 3, 2023 by the Group Manager.
- Residential Cleaning Inspection Card in Afdeling II PT Arindo Trisejahtera Petapahan-1 Estate Year 2023 and

Housing Afdeling I, VII and VIII PT Subur Arum Makmur Subur Arum Makmur Estate which is carried out monthly by the Afdeling Assistant and reviewed every 6 months with the GM of the Estates. The inspection results in March 2023 showed that there were no traces of burning waste, there were no used hazardous and toxic waste packaging, and there were still waste management banners at Afdeling II Housing Complex PT Arindo Trisejahtera Petapahan-1 Estate Year 2023 and Housing Afdeling I, VII and VIII Subur Arum Makmur Estate.

- Appointment of Transportation Responsible for Housing Cleaning Letter No. 017/ATS-PTPH/III/2023 stipulated by the Plantation Group Manager on March 7, 2023. The document stipulates a cleanliness monitoring coordinator for the 2023 period, namely Afdeling Assistant at PT Arindo Trisejahtera in every housing in PT Arindo Trisejahtera.

Based on the results of the explanation above, the unit of certification has carried out a root cause analysis and determined corrections and corrective actions as well as shown an attachment to proof of improvement. Thus, the nonconformity on this indicator is declared to have been fulfilled.

Verified by : **Erika Lucitawati**

NCR No.	: 2021.08	Issued by	: Radytio Puspanjana
Date Issued	: 27 November 2021	Time Limit	: 25 February 2022
NC Grade	: Major	Date of Closing	: 08 February 2022
Standard Ref. & Requirement	7.12.4 Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).		
Evidence observed (filled by auditor): The company has an HCV management program which is described in the matrix document of PT SAM and PT ATS HCV management and monitoring plans for 2021, while the HCV management and monitoring plan includes: <ul style="list-style-type: none">- Make boundaries for the HCV area according to the map identified by the HCV.- Install signboards regarding HCV.- Conduct socialization about HCV to employees and the local community.- Ensure that plantation infrastructure development does not enter HCV areas.- Make posters about protected animals and vegetation.- Water quality management conducts an inventory of damaged HCV areas.- Rehabilitate the HCV area if it has been replanted.- Enrichment of plant species in the HCV area.- It is forbidden to use agrochemicals for upkeep on riparian (HCV). There is also a procedure for safe use of pesticides. SOP number FR.CSM.OP.2 which was published on September 1, 2011, at point 3.3.1.7 explains not to spray pesticides in riparian areas. However, based on the results of the field visit on the onsite audit carried out, it is known that there are still things that are not in accordance with the 2021 HCV management and monitoring plan, such as: <ul style="list-style-type: none">- There are no clear boundaries of the HCV area on the Sei Panas river riparian block K34, SAM-1 estate.- Application of pesticides in the HCV area of the Air Hitam river riparian in Petapahan-2 block 05 division 1.			

- There are no clear boundaries of the HCV area in the grave area (Petapahan-2).
- There is no signboard about protected animals and vegetation.

Non-Conformance Description (filled by auditor):

The unit of certification has not been able to show sufficient evidence that the implementation of the management of the HCV area has been in accordance with the established plan.

Root Cause Analysis (filled by organization audited):

Lack of supervision from Management regarding procedures for managing HCV areas in the company

Correction (filled by organization audited):

1. The company shows evidence of real HCV boundaries in the field (Sam-1 Kepanasan River Border & ATS-2 Graveyard Area Boundary)
2. The company shows an internal memo to employees of spray and fertilizer for river border areas
3. Installation of signboards for wild animals and vegetation in HCV areas

Corrective Action (filled by organization audited):

1. The unit management conducts periodic socialization regarding the management of river border areas to spray and fertilizer employees
2. Provide and improve understanding on a regular basis to the supervised level
3. Carry out regular monitoring and maintenance of the warnings and boundaries of HCV management

Assessor Evaluation and Conclusion (filled by auditor):
Verification on 08 February 2022

The company shows evidence of improvement in the form of:

1. Minutes of Installation of Flora and Fauna Information Boards at PT ATS in the HCV area on 31 December 2021
2. List of wild animals and list of plant species PT ATS
3. Minutes of Installation of Flora and Fauna Information Boards at PT SAM in the HCV area on 28 December 2021
4. Circulars from the GM of PT ATS and PT SAM No. 047/ATS/SE/XII/2021 and No. 057/SAM/SE/XII/2021 dated 10 December 2021 regarding HCV management, among others, state: prohibition of throwing garbage into rivers, prohibiting agrochemical use on riverbanks. Boundaries are red paint and border signposts; prohibit employees from capturing, maintaining and trading wild animals in the PT ATS area; Prohibit all employees from cutting down trees in river border areas; prohibit all employees from catching fish using poison or tuba which can pollute the river
5. Setting up the boundaries of the PT ATS HCV area (Tomb) using a fence and HCV warning
6. Report on training/socialization dated January 14, 2022 regarding limits for application of fertilizers and pesticide followed by workers
7. Socialization of HCV management on 1 December PT ATS

Auditor conclusion :

Based on root cause analysis, corrections, corrective actions, and proof of improvement sent non-conformances are declared fulfilled

Verified by : **Radytio Puspanjana**

3.4.2 Identification of Findings, Corrective Actions and Observations at ASA-3 Assessment

NCR No.	: 2023.01	Issued by	: Briyogi Shadiwa
Date Issued	: 17 February 2023	Time Limit	: 18 May 2023
NC Grade	: Major	Date of Closing	: 05 April 2023
Standard Ref. & Requirement	3.8.7 Purchasing and Goods in <div><div>i.</div><div>The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</div><div>ii.</div><div>The mill shall inform the CB immediately if there is a projected overproduction of certified volume.</div><div>iii.</div><div>The mill shall have a mechanism in place for handling of non-conforming FFB and/or documents.</div></div>		
Evidence observed (filled by auditor): <div><div></div><div><div></div><div>Based on Supply Chain Policies and Procedures dated December 20, 2018 and revised April 22, 2021 (FR.CSM.MRPR rev 01) it is known that the mills ensure the traceability of FFB supplied to RSPO certified and non-RSPO certified mills.</div><div></div><div>Based on the results of field observations at Subur Arum Makmur Estate, there are blocks that are outside the scope (beyond the boundaries of the HGU markers), namely in blocks S8, S9, S10 (between HGU Marks No. 57 and 58).</div><div></div><div>Based on a review of FFB receipts for the period February 2022 to January 2023, all FFB originating from Subur Arum Makmur Estate is RSPO Certified FFB. This was also reinforced by the results of interviews with scale operators at PKS Subur Arum Makmur.</div></div></div>			
Non-Conformance Description (filled by auditor): <div>There is not enough evidence that the recording of certified and non-certified FFB sources is carried out thoroughly.</div>			
Root Cause Analysis (filled by organization audited): <div>POM team does not fully understand the sources of FFB which are fruit suppliers to POM.</div>			
Correction (filled by organization audited): <div>The unit of certification shows:<div><div></div><div>Revised Mass Balance for the period Jan 2022 – Jan 2023.</div><div></div><div>Examples of weighing slips for blocks S08, S09, and S10.</div></div></div>			
Corrective Action (filled by organization audited): <div>The Sustainability Team conducts socialization on the handling of certified and non-certified fruit to the POM team (Mill, production scales and clerks) in the field.</div>			
Assessor Evaluation and Conclusion (filled by auditor): <div>Auditor Verification (April 5, 2023)<div>The unit of certification shows evidence of improvement in the form of:<div><div></div><div>Minutes of socialization of PKS PT Subur Arum Makmur on 6 February 2023 regarding information on blocks that are not RSPO certified (Blocks S8, S9 and S10). The activity was attended by PICs involved in the separation of certified products (production clerks and heads of scales).</div><div></div><div>Mass balance records for the last 12 months (February 2022 to January 2023) which have separated non-certified FFB in Blocks S8, S9 and S10.</div></div></div></div>			

- Records of block weighing slips S8, S9 and S10 on 26 February 2023 with non-RSPO certified status.

Based on the objective evidence, the nonconformity has been met and the consistency of its application will be reviewed again in the next assessment.

Follow up on next audit (filled by auditor):

Verified by : **Briyogi Shadiwa**

NCR No.	: 2023.02	Issued by	: Firda Tarunajaya
Date Issued	: 17 February 2023	Time Limit	: 18 May 2023
NC Grade	: Major	Date of Closing	: 17 May 2023
Standard Ref. & Requirement	: 3.6.2 Critical The effectiveness of the H&S plan to address health and safety risks to people is monitored.		

Evidence observed (filled by auditor):

The Unit of Certification shows the results of risk identification at SAM Estate, Petapahan-1 Estate and Petapahan-2 Estate. For example, there are documents on Hazard Identification and Risk Assessment in Petapahan-1 Estate and Petapahan-2 Estate which were prepared for the period January-December 2022. In these documents all potential hazards have been identified in all units, identification of existing constraints, OHS risk analysis, pre-assessment of risks. Controlled, risk control, risk assessment after being controlled and the person in charge of the activity. Hazard source analysis, assessment and risk control are made by the OHS Committee Secretary who has a General OHS Expert certificate. The document describes hazard identification in each unit or activity, such as nurseries, *land clearing/replanting*, mechanical road maintenance, manual road maintenance, mechanical ditch washing, stump clearing, raking discs, saplings and palm saplings, spraying, fertilizing, , fertilizing, infusion of micro fertilizer, land application, application of empty pods, sprader, generator engine, *TUS* car, school bus, DT driver, inspection of *gupon*, *pruning*, harvesting, harvesting at high voltage locations, FFB transportation, fire towers, hotspot monitoring, census Plant Pest, filling the fuel tank, activities on the road, electric welding, welding/cutting, grinding, drilling, electrical installation, changing tires.

Hazard Identification and Risk Assessment at SAM Estate, Petapahan-1 Estate and Petapahan-2 Estate have covered all operational activities in the field.

The Unit of Certification has socialized this company policy to employees and stakeholders including Socialization of first aid, hazardous and toxic materials symbol, hazardous and toxic waste symbols, HIRAC, HCV, waste management, harvesting and maintenance work techniques (spray and fertilizer), company policies, flow of complaints and introduction to RSPO SCCS which was held on December 5th, 2022, and was attended by 16 PT ATS foremen.

Based on the description above, it shows that the company has assessed the risks and identified OHS problems in all parts of the certification unit.

The company shows evidence of HSE operator training certificates in the plantation and factory units at PT. SAM, namely:

NO	CERTIFICATE	DATE	NAME	POSITION	UNIT	OPERATOR	LICENSE PERIOD
1	852/AMU/K3-MD/XII/2022	1 Dec 2022	Ahmad Mirwan	Engine room operator	POM	Motor Diesel Class 1	1 Des 2027

2	865/AMU/K3-MD/XII/2022	1 Dec 2022	Suroso	Engine room operator	POM	Motor Diesel Class 1	1 Des 2027
3	5/24193/AS.02.00/XI/2021	18 Nov 2021	Riki Muherli	Engine room operator	POM	Aircraft Power and Production	18 Nov 2026
4	899/OPK3/B.1/IX/2014	24 Sep 2014	Selamet	Sterilizer operator	POM	class 1 steam plane	30 Apr 2024
5	29958/BDI-MEDAN/BOILER-XII/X/2018	13 Oct 2018	Ahmad Mirwan	Boiler operator	POM	class 1 steam plane	23 Nov 2023
6	900/OPK3/B.1/IX/2014	26 Sep 2014	Heri Kiswanto	Boiler operator	POM	class 1 steam plane	30 Apr 2024
7	1612/OPK3/B.1/XI/2018	23 Nov 2014	Nanda Pratama	Boiler operator	POM	class 1 steam plane	23 Nov 2023
8	2188/OPK3/PAA-LT/II/2019	04 Feb 2019	Surya Darna	Grader Operator	POM	Motor Grader	04 Feb 2024
9	2191/OPK3/PAA-LT/II/2019	04 Feb 2019	Panca Purnama	Compactor Operator	POM	Compactor	04 Feb 2024
10	05/34278/AS.02.00/XII/2021	20 Dec 2021	Sapril	Wheel Loader Operator	Estate	Wheel loader	20 Des 2026
11	2189/OPK3/PAA-LT/II/2019	4 Feb 2019	Eko Junanta	Excavator Operator	POM	Excavator	04 Feb 2024
12	5/0296210722/AS.01.04/VII/2022	21 Jul 2022	Syaiful Bahri Purba	Mechanic	Estate	Class Welder I	21 jul 2027
13	2995/PK3-P3K/IV/2019	15 Apr 2015	Rahmat Nursodiq	Mekanik	Estate	First Aid Staff	15 apr 2024

In addition, there are several OHS training certificates for plantation and factory unit operators at PT. ATS, namely:

STATION	NAME	POSITION	OPERATOR LICENSE	LICENSE PERIOD
Engineering	Roni Haryanto	Mechanic	Aircraft Power and Production (11105/PM/PTP/XI/2021)	18 Nov 2026
	Eko Irwanto	Mechanic	Aircraft Power and Production (11108/PM/PTP/XI/2021)	18 Nov 2026
	Misdi	Grader Operator	Aircraft Power and Production (2182/OPK3/PAA-LT/II/2019)	03 Feb 2024
Estate	Bakti Malau	Driver DT	Lift and transport aircraft (10372/OPK3/PAA-LT/V/2019)	19 Mei 2024
	Patrius Sembiring	Driver DT	Lift and transport aircraft (10371/OPK3/PAA-LT/V/2019)	19 Mei 2024

The Unit of Certification shows the work program for implementing the occupational health and safety management system of PT. SAM and PT ATS, among others, proposed external training for certification of production personnel operators, steam aircraft operators, transport and lifting equipment operators, hyperkes, General OHS expert, Electrical OHS expert, first aid officers and welder certification from June to November 2023.

Based on observations and interviews at the PT. SAM, the name of the operator according to the division of the team and working hours, as follows:

- Engine Room Station has 3 Shifts with operator names & shift distribution as follows:
 - Shift 1: Riki Muherli
 - Shift 2: Suroso

- Shift 3: Triska

Based on information from the Riau Province Manpower and Transmigration Office, not all workers who operate heavy machinery and equipment have attended relevant OSH training.

Based on the applicable provisions, including:

- Ministerial Regulation No. 38 of 2016 concerning occupational safety and health of production-powered aircraft, types of machine tools and conventional production must have OHS coaching qualifications for class II operators.
- Ministerial Regulation No. 12 of 2015 concerning K3 electricity in the workplace, an electric voltage > 50 volts alternating current or 120 volts direct current must have an electrician's K3 expert.
- Ministerial Regulation regarding first aid in workplace accidents No. Per. 15/MEN/VIII/2008 that workplaces with low potential must have 1 first aid worker every 150 people.

Based on the above information it is known that:

- Not all shifts have operators who have attended HSE coaching certification training for factory machine operators
- The company only has 1 first aid worker who is not in accordance with the ratio of the existing workforce at PT SAM. Meanwhile, PT Arindo Trisejahtera does not have a licensed first aid worker.
- The Unit of Certification don't have personnel who have the competence of HSE electricity experts

Non-Conformance Description (filled by auditor):

The company has not been able to show enough evidence that the effectiveness of the OSH plan has been monitored to deal with OSH risks to people through a trained workforce

Root Cause Analysis (filled by organization audited):

OHS Officer have not identified operators with OHS qualifications for PT SAM and ATS

Correction (filled by organization audited):

The company shows:

1. Training plan for engine room officers
2. Training plan for 2 first aid workers at ATS 1 and ATS 2, & 2 first aid workers for All Estate PT. SAM
3. Electrical OHS Expert training plan

Corrective Action (filled by organization audited):

The Sustainability team and the plantation team jointly identify OHS training periodically at the annual management review meeting

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification on 10 April 2023

The company has carried out root cause analysis, corrections and corrective actions, and has been accepted by the Auditor. In addition, the Company has shown evidence of improvement in the form of:

- Minutes of meeting and follow-up notes on 25 March 2023 regarding the plan for improvement and follow-up to ASA-3 RSPO PT. Subur Arum Makmur namely operator training registration and explanation of license requirements for each operator based on applicable regulations
- Monitoring OHS operator training at PT. Subur Arum Makmur, Senamanenek Estate 2023 for process stations, engine rooms, sterilizers, engineering and estate
- Monitoring OHS operator training at PT. Arindo Trisejahtera, Petapahan Estate 2023 for the engineering and estate
- OHS training letter on March 31st, 2023 from services company of OHS, regarding the OHS training for several operators, namely:
 - 2 people OHS training for class 1 steam aircraft operators (Boilers), implementation on 8 to 13 May 2023

- 1 person OHS training for power and production aircraft operators, implementation on 10 to 13 May 2023
- 4 people training in OHS First Aid in the workplace, implementation on 11 to 13 May 2023

However, the company has not conducted an analysis of the needs of OHS electricity experts and has not shown clear progress or timeframes for enrolling its employees in the OHS electricity expert training.

Based on the evidence of the improvements made by the company above, this discrepancy has not been fulfilled.

Auditor Verification on 17 May 2023

The company shows a statement letter from services company of OHS on behalf of the Director of PT. Sepakat Jaya Pertama No. 310/K3/SJP-PKU/IV/2023 on 12 April 2023, stated that employees of PT. SAM on behalf of B.R has registered for the OHS Electrical Expert Training Certification of the Ministry of Manpower of the Republic of Indonesia according to the training schedule to be carried out by PT. SJP.

Based on the improvement evidence above, this discrepancy has been fulfilled and will be observed in the next assessment to see its implementation and consistency

Follow up on next audit (filled by auditor):

Verified by : **Firda Tarunajaya**

NCR No.	2023.03	Issued by	Erika Lucitawati
Date Issued	17 February 2023	Time Limit	Next Surveillance
NC Grade	Minor	Date of Closing	
Standard Ref. & Requirement	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.		
Evidence observed (filled by auditor): The unit of certification has shown the following documents:			
<ul style="list-style-type: none">Document of Directors Decree No. 001/SUSTAINABILITY_FR/XI/2018 concerning Policy for Handling Protected Wildlife 26 November 2018.Document Circular Number: PH/SE/VII/2018 dated 1 July 2018 from Plantation Group Manager, to all plantation and POM employees regarding Sanctions for Conservation Violations, explained as follows:<ul style="list-style-type: none">➤ Every employee is prohibited from hunting animals in the company area➤ It is forbidden to electrocute, bomb, and use poison in the river border area➤ Every employee is prohibited from catching, injuring, killing, keeping, possessing, maintaining and trading protected or unprotected animals.➤ If the employee violates the provisions above, the employee will be subject to sanctions with the provisions of the regulations that apply in Indonesia.Biodiversity Report of PT Subur Arum Makmur-1 Year 2022 which contains field identification of protected animals based on Minister of Environment and Forestry Regulation No. 106 of 2018, IUCN and CITES with the result that long-tailed monkeys are wild animals with unprotected status in <i>Permen LHK</i> No. 106 of 2018, wild animals with Endangered (EN) status in the IUCN, and wild animals in CITES Appendix II.Documents Report on Training/Socialization on understanding of wild animal species on 10 February 2022 at PT Subur Arum Makmur to 6 participants of spray workers.			

<ul style="list-style-type: none"> The results of a field visit to the Afdeling VII Employee Housing Complex at Subur Arum Makmur Estate showed that monkeys have been kept in the housing complex for the past 5 months. 	
Non-Conformance Description <i>(filled by auditor):</i> The unit of certification has not shown evidence that it has implemented wildlife protection in accordance with its policies.	
Root Cause Analysis <i>(filled by organization audited):</i> 	
Correction <i>(filled by organization audited):</i> 	
Corrective Action <i>(filled by organization audited):</i> 	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> 	
Follow up on next audit <i>(filled by auditor):</i> 	
Verified by :	

3.4.3 Opportunity for Improvement

No	Ref. Std.	Description
1	3.4.3	<p>The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p> <p>Unit of certification has the following documents:</p> <ul style="list-style-type: none"> • Evaluation of Social Impact Assessment through Social Management and Monitoring of PT Subur Arum Makmur 2022 which was carried out on 25 January 2022 involving representatives of the surrounding community such as Danau Lancang Village and Senamanenek Village, as well as company employee representatives. The results of the evaluation show the implementation of social impact management including communication programs with stakeholders, improving the quality of education, improving the quality of health, improving the community's economy, and environmental management. • Evaluation of the Social Impact Assessment through Social Management and Monitoring of PT Arindo Trisejahtera 2022 which was carried out on 25 January 2022 involving representatives of the surrounding community such as Rimba Village, improving the community's economy, as well as environmental and infrastructure management. <p>The evaluation results in 2022 discussed the implementation of social impact management and monitoring in 2019-2021 as feedback for the social impact management and monitoring plan in 2021-2023. Based on the results of interviews with representatives of the Danau Lancang Village community (PT Subur Arum Makmur), there are social impacts due to the existence of the company, namely the theft of palm fruit from the company by the community in the village at the end of 2022. In addition, the results of interviews with community representatives in Suka Ramai Village (PT Arindo Trisejahtera) stated that there was a flood that occurred in the river in Suka Ramai Village at the end of 2022. This river was crossed by companies around Suka Ramai Village, one of which was PT Arindo Trisejahtera. The results of the document review above, these two social impacts have not been included in the 2019-2021 social impact management and monitoring plan and implementation. Based on the results of interviews with company representatives, an evaluation of the 2022-2023 social impact management and monitoring plan will be carried out in early 2023. Thus, unit of certification has the opportunity to ensure that all emerging social impacts have been implemented, monitored and updated periodically in a participatory manner.</p>
2	6.2.4	<p>The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>The company shows a list of facilities and infrastructure for all plantation units and factories for the 2022 period. The document also explains a checklist for monitoring facilities and infrastructure in good condition.</p> <p>Based on the results of a field visit to PT ATS's Afdeling 2 employee housing huts, PT SAM's Afdeling 1, 7 and 8 and interviews with 8 housing residents, it was found that 3 out of 8 workers' houses were in damaged condition, such as leaky roofs, perforated ceilings and no closets. In the bathroom. In addition, it is also known that the majority of the houses in employee housing are semi-permanent type houses (concrete and wooden planks), but some are already permanent houses (full concrete).</p> <p>Based on the results of interviews with management representatives, it is known that the company</p>

		<p>has plans to renovate the damage and build permanent housing for employees. This is in line with the review of the Resume Meeting document on the Findings and Decisions related to Modern Slavery on September 19, 2022. The document explains the region's commitment to making improvements to facilities and infrastructure along with the timeframe. The company also shows a damage repair budget that will be implemented from March – December 2023 for PT ATS and August 2022 – May 2023 for PT SAM.</p> <p>The company has the opportunity to ensure the realization of proper repairs and construction of permanent housing for the welfare of employees.</p>
3	7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p> <p>PT Arindo Trisejahtera Petapahan-2 Estate has hazardous and toxic waste storage permit based on Decree of Head of <i>DPMPTSP</i> of Kampar Regency No. 503/DPM-PTSP/PEL/LB3/2017/03 dated 17 October 2017 and is valid for 5 years. The permit has expired on October 17, 2022. PT Arindo Trisejahtera has presented the following documents:</p> <ul style="list-style-type: none"> • Letter No. 02.04/X/005/II/2023 dated February 10, 2023 from PT Arindo Trisejahtera to Environmental Agency of Kampar Regency regarding Request for Directions regarding Permit for Temporary Storage of Hazardous and Toxic Waste. The letter explains the temporary storage permit for hazardous and toxic waste No. 503/DPMPTSP.PEL/LB3/2017/09 dated 17 October 2017 has expired on 17 October 2022. • Letter No. 660/DLH-BID3/84 dated 14 February 2023 from Environmental Agency of Kampar Regency to PT Arindo Trisejahtera II (Estate) regarding Directions for Permit for Temporary Storage of Hazardous and Toxic Waste. The letter explains that PT Arindo Trisejahtera II (Estate) is required to submit an application for a change in environmental approval without preparing a new environmental document and must be accompanied by technical details. <p>Based on the description above, PT Arindo Trisejahtera has the opportunity to ensure the process of changing the environmental approval without being accompanied by preparing new environmental documents and must be equipped with technical details regarding the storage of hazardous and toxic waste based on directions given by the competent authority.</p>

3.4.4 Noteworthy Positive Components

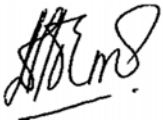

No	Description
1	The company already has a biogas installation in POME management
2	PT Subur Arum Makmur has obtained the 2021-2022 PROPER certificate from the Indonesian Ministry of Environment and Forestry with a Blue rating

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Head of SP3-SPSI & Head of KSBSI <ul style="list-style-type: none"> Company gives freedom to workers to associate. The union has been registered at the Manpower Office If there are problems with workers, they are always communicated with workers and the company. There are no issues related to disputes between workers and the company. There are no issues related to violations of decency norms (sex harassment). Payment of wages has referred to the latest 2023 Minimum Wage. 	<ul style="list-style-type: none"> company already has a policy related to labor unions. The union has been registered with the District Manpower and Transmigration Office Member meetings are always held when there are matters to be discussed with the company
Contractor PT Pagar Negeri February 16 th , 2023 <ul style="list-style-type: none"> The form of cooperation between the contractor and the company is the security service provider for companies. The company routinely conducts outreach to contractors and workers regarding compliance with regulations and policies that apply within the company such as implementing OHS while working, fulfilling labor rights, environmental management and others. The socialization is carried out at least once a year. These provisions are also stated in the work agreement letter. The contractor has provided the uniform and PPE for the workers. The contractor has also paid wages according to the minimum wage provisions in force in Kampar Regency and provided other benefits, such as <i>BPJS</i> allowance. While working with the company, the contractor said that he had no complaints. The cooperation and communication that has been established so far has been quite good. 	<p>There are no issues that need to be verified further, all information obtained from the results of the interviews has been submitted to the relevant indicators.</p>
Contractor PT Rajawali Perkasa Jaya February 16 th , 2023 <ul style="list-style-type: none"> The form of cooperation between the contractor and the company is the security service provider for companies. The company routinely conducts outreach to contractors and workers regarding compliance with regulations and policies that apply within the company such as implementing OHS while working, fulfilling labor rights, environmental management and others. The socialization is carried out at least once a year. These provisions are also stated in the work agreement letter. The contractor has provided the uniform and PPE for the workers. 	<p>There are no issues that need to be verified further, all information obtained from the results of the interviews has been submitted to the relevant indicators.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> The contractor has also paid wages according to the minimum wage provisions in force in Kampar Regency and provided other benefits, such as <i>BPJS</i> allowance. While working with the company, the contractor said that he had no complaints. The cooperation and communication that has been established so far has been quite good. 	
Plantation, Livestock and Animal Health Agency of Kampar Regency <ul style="list-style-type: none"> Unit of certification has submitted a report on plantation business activities every semester which includes CSR implementation activities. Unit of certification already has a plantation business assessment. There have been no incidents of land and forest fires since 2016 at unit of certification or around the unit of certification. There is no issue of disruption to plantation business. Unit of certification already has sufficient facilities and infrastructure for prevention and control of land fires. Unit of certification has carried out CSR activities including in the social, infrastructure, economic, etc. 	<p>Based on result of interview and document review, it is known that there are no negative issues in between unit of certification and agency. This good relationship has been established in a conducive atmosphere until this assessment is carried out.</p>
Manpower and Transmigration Agency of Riau Province <ul style="list-style-type: none"> Unit of certification already has CLA, workers' union, and OHS Committee which have been approved by the agency. Unit of certification has implemented payment of wages to employees in accordance with applicable regulations. Unit of certification has provided health and employment insurances for all employees. There are no workers with contract status in unit of certification. There are no issues of discrimination, child labour, forced labor and sexual harassment in unit of certification. There are no reports related to industrial relations to the agency. Not all workers who operate heavy machinery/equipment in the plantation and POM have an operating license. 	<p>Based on result of interview and document review, it is known that there are no negative issues in between unit of certification and agency. This good relationship has been established in a conducive atmosphere until this assessment is carried out. Related to not all workers who operate heavy machinery/equipment in the plantation and POM have an operating license has been verified in 3.6 criteria.</p>
National Land Agency of Kampar Regency <ul style="list-style-type: none"> There were no complaints from the surrounding community that were submitted to National Land Agency. Unit of certification has submitted regular reports regarding the use of <i>HGU</i> to National Land Agency. Communication between Unit of certification and National Land Agency is going well. 	<p>Based on result of interview and document review, it is known that there are no negative issues in between unit of certification and agency. This good relationship has been established in a conducive atmosphere until this assessment is carried out.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
Environmental Agency of Kampar Regency <ul style="list-style-type: none"> Unit of certification has a valid environmental permit, liquid waste disposal permit, and hazardous waste storage permit. Unit of certification routinely submit mandatory reports such as environmental management and monitoring implementation report, hazardous waste management report, and POME management report to Environmental Agency. Communication between unit of certification and the Environmental Agency went smoothly. 	<p>Based on result of interview and document review, it is known that there are no negative issues in between unit of certification and agency. This good relationship has been established in a conducive atmosphere until this assessment is carried out.</p>
Local Village Representative Interviewee: <ul style="list-style-type: none"> Suka Ramai Village Danau Lancang Village Unit of certification absorbs workers from the village. There are no issues regarding environmental pollution due to unit of certification's operational activities in the last 1 year. Unit of certification has socialized about protected animals and conservation areas and put-up signs prohibiting hunting certain animals around the plantation area. Socialization of the prohibition of burning has been carried out for land clearing activities. Unit of certification has carried out CSR activities in 2022 including in the fields of religion, social, economy, education, infrastructure etc. There is no communication problem between the village and unit of certification and unit of certification always responds to requests from the village. 	<p>Based on the results of document verification, information from representatives is appropriate, such as unit of certification already has CSR program and realization, socialization, etc.</p>
CPO Transporter (CV Teman Setia) <ul style="list-style-type: none"> The contractor has a copy of the agreement with the company. Ready to be audited by a third party regarding the RSPO. Payments to contractor in accordance with the agreement. Contractor workers have been provided with PPE and already have <i>BPJS</i>. The company has provided socialization regarding the code of ethics and human rights. 	<p>There are no issues that need to be verified further, all information obtained from the results of the interviews has been submitted to the relevant indicators.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Subur Arum Makmur Management Representative</p>  <p><u>Eko Darmawanto</u> Wednesday, 17 May 2023</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Briyogi Shadiwa</u> Wednesday, 17 May 2023</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Plantation, Livestock and Animal Health Agency	Kampar Regency		Direct interview	15 February 2023	✓	
2	Manpower and Transmigration Agency	Riau Province		Interview via telephone	15 February 2023	✓	
3	National Land Agency	Kampar Regency		Direct interview	15 February 2023	✓	
4	Environmental Agency	Kampar Regency		Direct interview	15 February 2023	✓	
5	Local Village Representative • Village of Suka Ramai • Village of Danau Lancang	Kampar Regency		Direct interview	14-15 February 2023	✓	
6	Labor Union: - Head of SP3-SPSI - Head of KSBSI	Tapung Hulu Sub District, Kampar District	-	Direct Interview	15 February 2023	✓	
7	Contractor: - PT Pagar Negeri - PT Rajawali Perkasa Jaya	Tapung Hulu Sub District, Kampar District	-	By Phone	15 February 2023	✓	
8	Subur Arum Makmur POM: - 2 Weighbridge Operators - 3 Grading operators - 1 Grading Foreman - 1 Sterilizer operator - 1 Boiler operator - 1 Engine room operator - 1 Nut & Kernel operator - 1 Security - 1 Workshop Officer - 1 WTP Operator - 1 Warehouse Officer	Tapung Hulu Sub District, Kampar District	-	Direct Interview	14 February 2023	✓	
9	Subur Arum Makmur Estate - 3 Fertilizer Applicator	Tapung Hulu Sub District, Kampar District	-	Direct Interview	15 February 2023	✓	

	<ul style="list-style-type: none"> - 2 Fertilizer Foreman - 1 Foreman Coordinator - 1 Transportation Foreman - 1 Dump Truck Driver - 3 Loading FFB Operator - 1 Transport Foreman - 1 Sprayer Foreman - 3 Sprayer Chemist - 1 Harvester Foreman - 2 Harvester - 6 Resident of employee housing - 1 Daycare Officer - 1 Headmaster of Elementary School - 1 Workshop Officer - 2 Medical Personnel 						
10	Petapahan-1 Estate <ul style="list-style-type: none"> - 5 Harvester - 1 Harvester Foreman - 4 Sprayer Chemist - 3 Fertilizer Applicator - 3 Nursery Workers - 1 Daycare Officer 	Tapung Hulu Sub District, Kampar District	-	Direct Interview	14 February 2023	✓	
11	Petapahan-2 Estate <ul style="list-style-type: none"> - 3 Fertilizer Applicator - 1 Fertilizer Foreman - 1 Foreman Coordinator - 1 Transportation Foreman 	Tapung Hulu Sub District, Kampar District	-	Direct Interview	14 February 2023	✓	

	<ul style="list-style-type: none"> - 1 Sprayer Chemis Foreman - 3 Sprayer Chemist - 1 Harvester Foreman - 3 Harvester - 						
12	PT. Tresko Cahaya Abadi <ul style="list-style-type: none"> - 2 Operator Excavator 	Tapung Hulu Sub District, Kampar District	-	Direct Interview	14 February 2023	✓	
13	Jikalahari	Indonesia	sekretariat@jikalalahari.org	By Email	8 February 2023		✓
14	Perkumpulan Elang	Indonesia	sekretariat@elang.or.id	By Email	8 February 2023		✓
15	Greenpeace	Indonesia	supporterservices.id@greenpeace.org	By Email	8 February 2023		✓
16	Sawit Watch	Indonesia	info@sawitwatch.or.id	By Email	8 February 2023		✓

Appendix 2. Assessment Program

DATE	13 – 17 February 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 13 February 2023		
07.30 – 09.15	JAKARTA (CGK) → PEKANBARU (PKU)	All Auditor
10.00 – 13.00	PEKANBARU → PT SUBUR ARUM MAKMUR	All Auditor
15.00 – 16.00	Opening Meeting: <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	All Auditor
Tuesday, 14 February 2023		
08.00 – 12.00	<ul style="list-style-type: none"> Public consultation with stakeholder to relevant agency in Kampar Regency Stakeholder consultation to affected communities surrounding the plantations and previous land owner. Document review and completing audit checklist. Field Observation to Petapahan-1 & Petapahan-2 Estate Aspect to be verified: <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). Interview with related personnel's during field observation. 	ELU SIA & BRI FIT SIA & BRI FIT SIA & BRI FIT FIT, SIA & BRI
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Field observation to Subur Arum Makmur POM: <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO) Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond) Implementation of Employment Procedure and Mechanism Aspect Presentation of Daily Progress	FIT SIA & BRI ELU All Auditor
Wednesday, 15 February 2023		

DATE	13 – 17 February 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 12.00	Field Observation to Subur Arum Makmur Estate Aspect to be verified: <ul style="list-style-type: none"> • Implementation of Legal Aspect (Land Ownership, Legal Boundaries); • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) • Implementation of Occupational Health & Safety Aspect • Implementation of Employment Procedure and Mechanism Aspect • Observation of Workers Facilities (Housing, School, Worship Place). • Interview with related personnel's during field observation. 	ELU FIT SIA & BRI FIT SIA & BRI FIT FIT, SIA & BRI
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> • Document review and completing audit checklist. • Stakeholder Interview: <ul style="list-style-type: none"> - Gender Committee, Worker Union, Worker Cooperation - Local Contractor for Mill and Estate - Third Parties Supplier Presentation of Daily Progress.	All Auditor SIA & BRI FIT & ELU BRI All Auditor
Thursday, 16 February 2023		
08.00 – 12.00	Document review and completing audit checklist.	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Document review and completing audit checklist. Presentation of Daily Progress.	All Auditor
Friday, 17 February 2023		
08.00 – 10.00	Closing Meeting: <ul style="list-style-type: none"> • Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion) • Comments, Responses and Questions 	All Auditor
11.00 – 14.00	PT SUBUR ARUM MAKMUR → PEKANBARU (PKU)	All Auditor
17.30 – 19.25	PEKANBARU (PKU) → JAKARTA (CGK)	All Auditor