

*Roundtable on Sustainable Palm Oil Certification  
RSPO*

**[✓] Surveillance / Extension Scope**

Name of Management Organization : **Kendawangan Palm Oil Mill PT Gunajaya Karya Gemilang Subsidiary of Bumitama Agri Ltd**

Plantation Name : **PT Gunajaya Karya Gemilang** (Mekar Utama Estate, Kendawangan Estate, and Sungai Tapah Estate) and **PT Gunajaya Ketapang Sentosa** (Banjarsari Estate, Seriam Jaya Estate, Membuluh Sejahtera Estate and Kopbun Rimba Sari)

Location : Banjar Sari & Seriam Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia.

Certificate Code : **MUTU-RSPO/081**

Date of Initial Registration : 03 December 2015

Date of Certificate Issue : 25 March 2022                      Date of License Issue : 25 June 2023

Date of Certificate Expiry : 24 March 2027                      Date of License Expiry : 24 March 2024

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.1	6-11 February 2023	Briyogi Shadiwa (Lead Auditor), Erika Lucitawati, Firda Tarunajaya and Sabiah Dhiningtyas Utami	Hasiholan Sihombing	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.1	02 June 2023

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**Figure 1. Location Map of PT Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa**

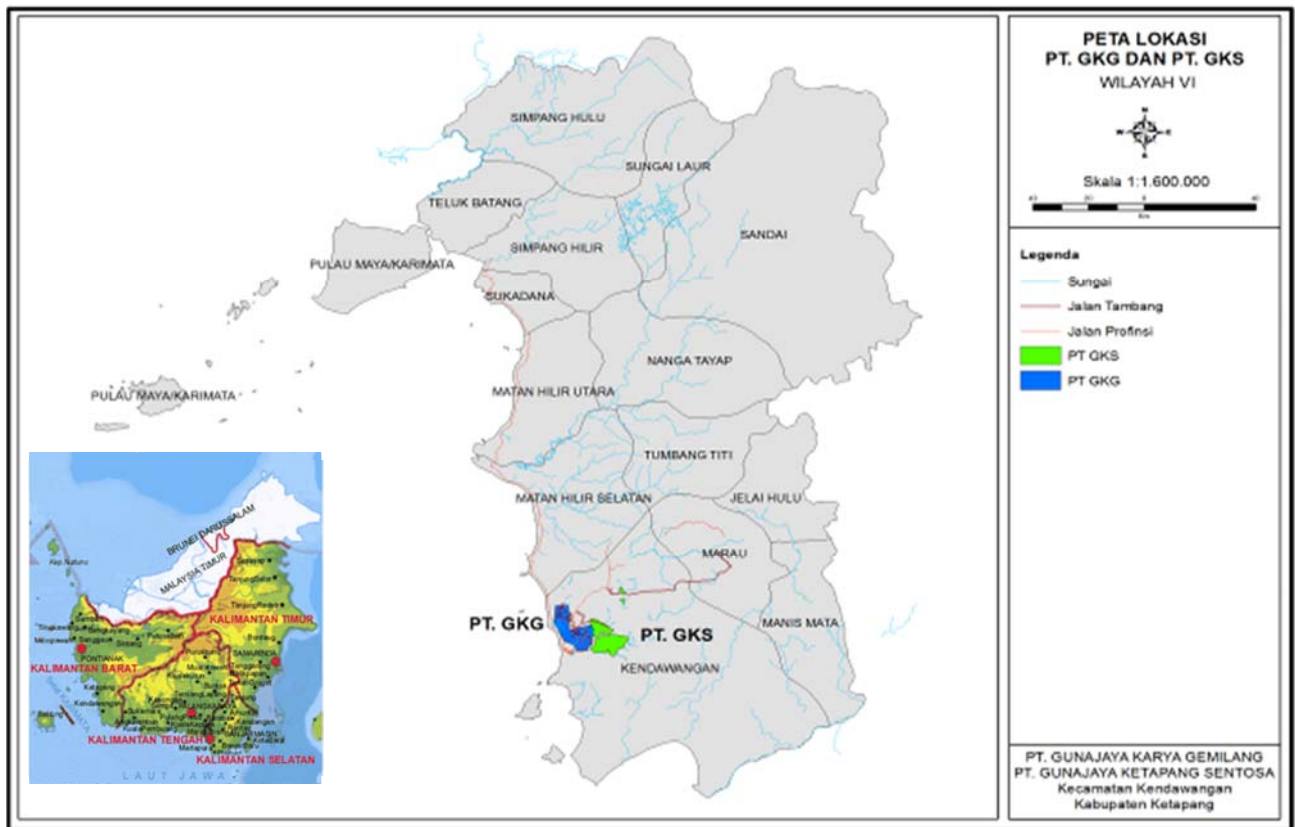
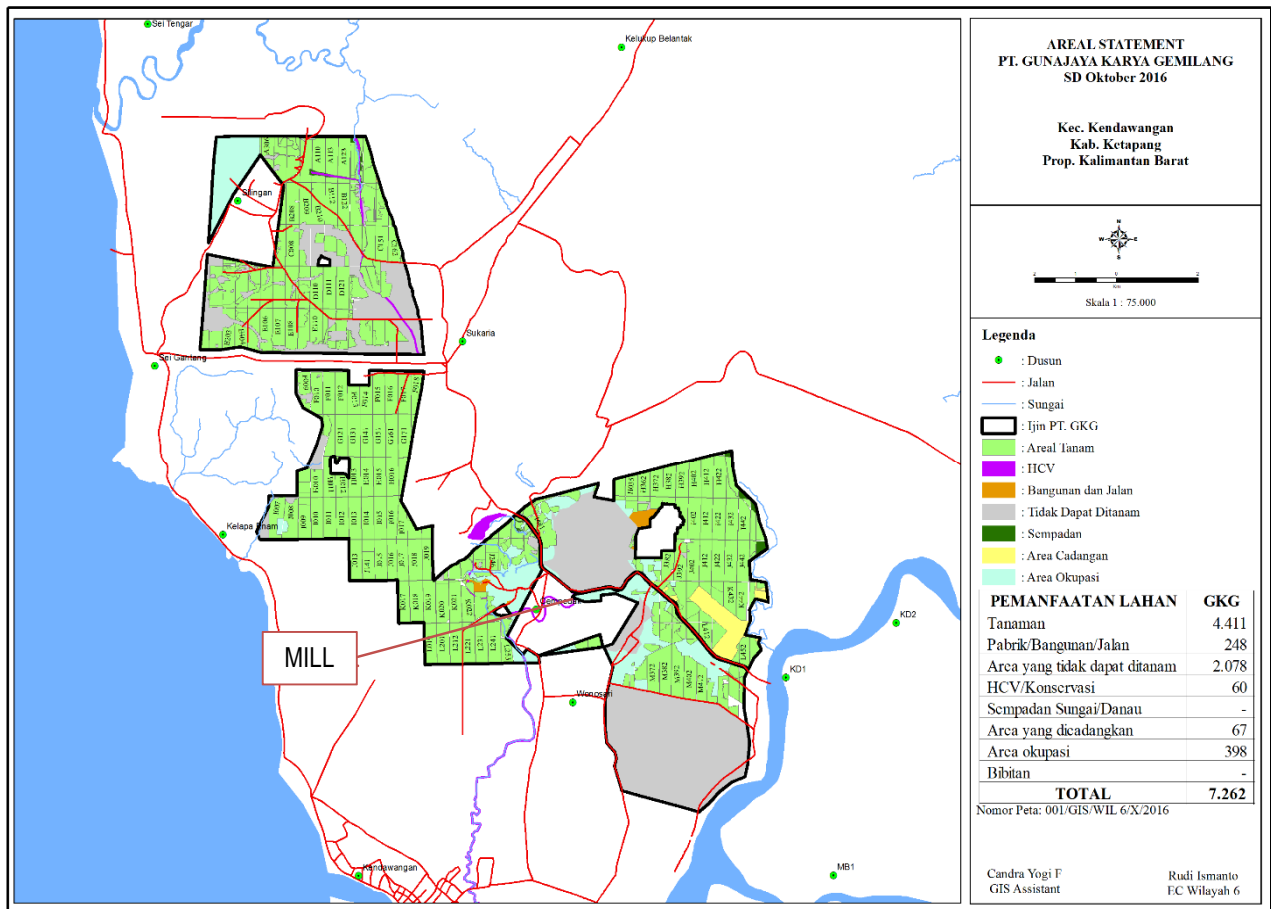
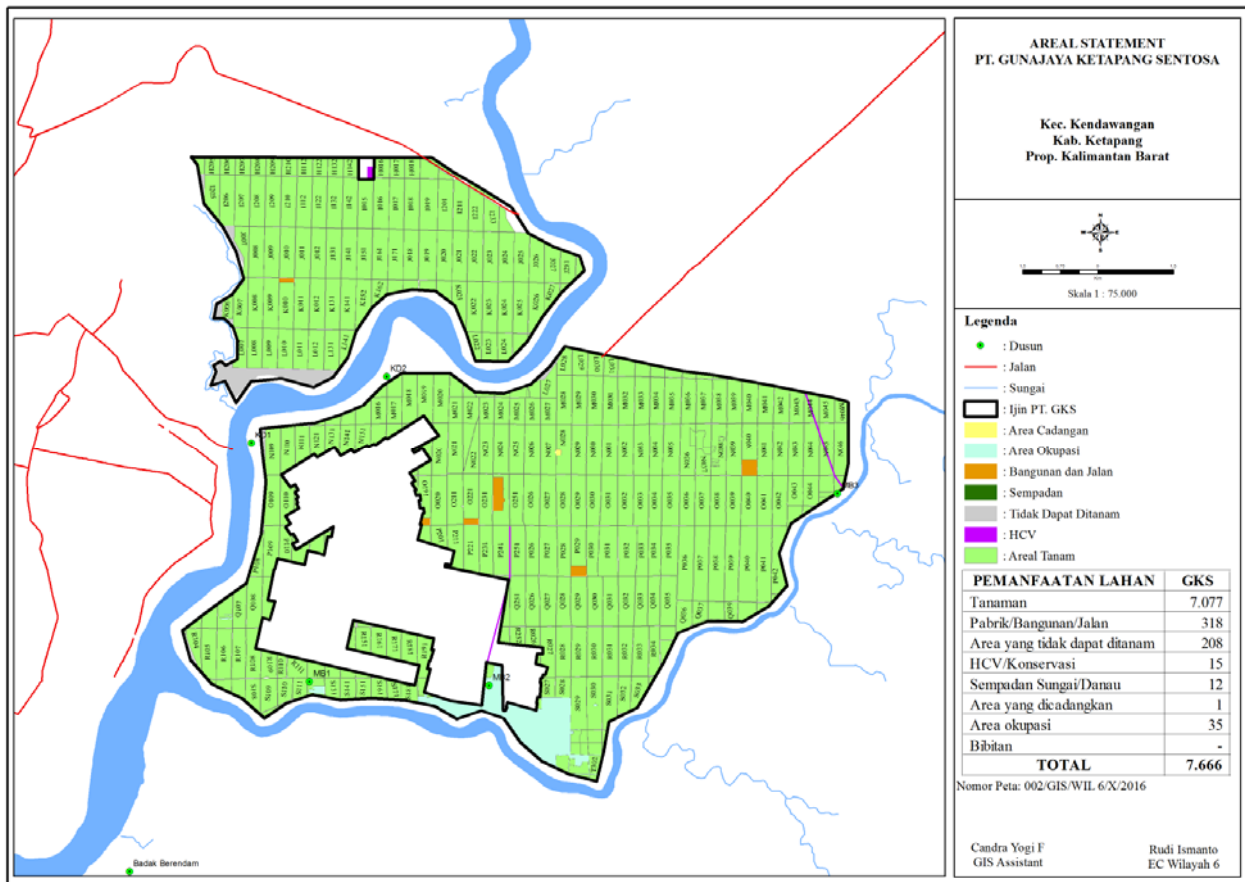


Figure 2. Operational Map of PT Gunajaya Karya Gemilang



**Figure 3. Operational Map of PT Gunajaya Ketapang Sentosa**



**Abbreviations Used**

ASA	:	Annual Surveillance Assessment
BGA	:	Bumitama Gunajaya Agro
BGS	:	BGA Ground Management System
BHS	:	BGA Harvesting System
BMP	:	Best Management Practices
BMS	:	BGA Manuring System
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> / Social Security Agency
BSRE	:	Banjarsari Estate
BSS	:	BGA Spraying System
CD	:	Community Development
CH	:	Certificate Holder
COO	:	Chief Operating Officer
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
DPPL	:	Environmental Management and Monitoring Documents
EFB	:	Empty Fruit Bunch
EIA	:	Environment Impact Assessment
EMPID	:	Employee Identity
EWS	:	Early Warning System
FFA	:	Free Fatty Acid
FFB	:	Fresh Fruit Bunch
FPIC	:	Free Prior Informed Consent
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Permit)
HCV	:	High Conservation Value
HPT	:	<i>Hama Pengendalian Terpadu</i> / Integrated Pest Management
HRD	:	Human Resource Department
HSE	:	Health, Safety and Environment
HIRAC	:	Hazard Identification and Risk Assessment Control
IDR	:	Indonesian Rupiah
ILO	:	International Labour Organization
IPM	:	Integrated Pest Management
IPAL	:	<i>Instalasi Pengelolaan Air Limbah</i> (Waste Water Treatment Plant)
ISPO	:	Indonesian Sustainable Palm Oil
LUCA	:	Land Uses Change Analysis
KER	:	Kernel Extraction Rate
KNDE	:	Kendawangan Estate
KUD	:	Koperasi Unit Desa ( <i>village cooperative</i> )
MNKR	:	Metro Kendawangan Region
MSDS	:	Material Safety Data Sheet
MSJE	:	Membuluh Sejahtera Estate
MUTE	:	Mekar Utama Estate
NPP	:	New Planting Procedure
OER	:	Oil Extraction Rate
OFI	:	Opportunity for Improvement
OHS	:	Occupational Health and Safety

PK	:	Palm Kernel
P2K3	:	Panitia Pembina Keselamatan dan Kesehatan Kerja/OHS Committee
PerkimLH	:	Regency, Housing and Settlement Areas and the Environment Agency
PHL	:	<i>Pekerja Harian Lepas / Freelance Daily Worker</i>
PK	:	Palm Kernel
PKB	:	<i>Perjanjian Kerja Bersama/Collective Labour Agreement</i>
PKWT	:	<i>Perjanjian Kerja waktu Tertentu/Specified Time Work Agreement</i>
PMKS	:	<i>Pabrik Minyak Kelapa Sawit</i>
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PTH	:	<i>Pekerja Tetap Harian /Daily Permanent Worker</i>
PTB	:	<i>Pekerja Tetap Bulanan /Monthly Permanent Worker</i>
RaCP	:	Remediation and Compensation Procedure
RKL RPL	:	<i>Rencana Pengelolaan Lingkungan – Rencana Pemantauan Lingkungan (Environment Management and Monitoring Plan)</i>
RSPO	:	Roundtable and Sustainable Palm Oil
RTE	:	Rare, Threatened, Endangered
SCCS	:	Supply Chain Certification System
SHM	:	<i>Sertifikat Hak Milik</i>
SIA	:	Social Impact Assessment
SLME	:	Sei Liam Estate
SMGE	:	Sei Mandang Estate
SOP	:	Standard Operational Procedure
SPK	:	<i>Surat Perjanjian Kerja/Letter of agreement</i>
STHE	:	Sungai Tapah Estate
TPH	:	<i>Tempat Pengumpulan Hasil</i>
WLTK	:	<i>Wajib Lapo Tenaga Kerja / Employment Report</i>
WTP	:	Water Treatment Plant
WWTP	:	Water Waste Treatment Plan

<b>1.0</b>	<b>SCOPE OF THE CERTIFICATION ASSESSMENT</b>		
<b>1.1</b>	<b>Assessment Standard Used</b>		
		<ul style="list-style-type: none"> <li>• RSP0 Certifications Systems for Principles &amp; Criteria and RSP0 Independent Smallholders Standard (Endorsed by RSP0 Board of Governors on 12 November 2020).</li> <li>• Indonesia National Interpretation RSP0 Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSP0 Board of Governors on 20<sup>th</sup> April 2020.</li> </ul>	
<b>1.2</b>	<b>Organisation Information</b>		
1.2.1	Organization name listed in the certificate	PT Gunajaya Ketapang Sentosa & PT Gunajaya Karya Gemilang, Subsidiary of Bumitama Agri Ltd	
1.2.2	Contact person	Lim Sian Choo	
1.2.3	Organisation address and site address	RSP0 registered company: Jl. Melawai Raya No. 10 Kebayoran Baru Jakarta Selatan 12160 Indonesia.	
1.2.4	Telephone	(62-21) 727 98418	
1.2.5	Fax	(62-21) 727 98665	
1.2.6	E-mail	<a href="mailto:lim.sian.choo@bumitama.com">lim.sian.choo@bumitama.com</a>	
1.2.7	Web page address	<a href="http://www.bumitama-agri.com">www.bumitama-agri.com</a>	
1.2.8	Management Representative who completed the application for certification	Lim Sian Choo (Head of CSR and Corporate Sustainability)	
1.2.9	Registered as RSP0 member	1-0043-07-000-00 – 08 October 2007	
<b>1.3</b>	<b>Type of Assessment</b>		
1.3.1	Scope of Assessment and Number of Management Unit	Kendawangan POM and 7 Supply Base: <ul style="list-style-type: none"> <li>• PT Gunajaya Karya Gemilang (Mekar Utama Estate, Kendawangan Estate, and Sungai Tapah Estate)</li> <li>• PT Gunajaya Ketapang Sentosa (Banjarsari Estate, Seriam Jaya Estate, and Membuluh Sejahtera Estate)</li> </ul> <i>Extension Scope: Kopbun Rimba Sari</i>	
1.3.2	Type of certificate	Single	
<b>1.4</b>	<b>Locations of Mill and Plantation</b>		
1.4.1	<b>Location of Mill</b>		
	<b>Name of Mill</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b>
			<b>Longitude</b>
	Kendawangan POM	Banjarsari Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 26' 45"
			E 110° 15' 57"
1.4.2	<b>Location of Certification Scope of Supply Base</b>		
	<b>Name of Supply</b>	<b>Location</b>	<b>Coordinate</b>



Base		Latitude	Longitude
Mekar Utama Estate	Mekar Utama Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 28' 11"	E 110° 12' 09"
Kendawangan Estate	Kendawangan Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 26' 35"	E 110° 16' 15"
Sungai Tapah Estate	Mekar Utama Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 25' 49"	E 110° 11' 55"
Seriam Jaya Estate	Seriam Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 29' 03"	E 110° 20' 28"
Banjar Sari Estate	Banjarsari Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 25' 33"	E 110° 19' 01"
Membuluh Sejahtera Estate	Seriam Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 28' 53"	E 110° 23' 07"
Koperasi Rimba Sari (395 members)	Banjarsari Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 25' 33"	E 110° 19' 01"

**1.5 Description of Area Statement**

1.5.1	Tenure	
	• State	15,823.14 Ha
	• Community	

**1.5.2 Area Statement**

	PT GKG (Ha)	PT GKS (Ha)	Koperasi Rimba Sari	Total (Ha)
<b>Total area</b>	<b>7,559.79</b>	<b>7,679.38</b>	<b>583.97</b>	<b>15,823.14</b>
Mature area	4,565.91	7,076.85	583.97	12,226.73
Immature area	-	-	-	-
Mill/Building/Road	390.65	318.22	-	708.87
Unplanted Area (ex-mining and swamp)	208.51	25.20	-	233.71
River	296.51	-	-	296.51
Occupation	2,038.21	244.11	-	2,282.32
HCV	60.00	15.00	-	75.00

**1.6 Planting Year and Cycles**

**1.6.1 Age profile of planting year**

Planting Year	Hectarage (Ha)						Koperasi Rimba Sari	Total (Ha)
	PT GKG			PT GKS				
	MUTE	KNDE	STHE	SJYE	BSRE	MSJE		
2007	453	-	346.73	-	-	-	-	799.73

	2008	103.38	537.12	142.65	548.89	1502.24	1,020.68	-	3,854.96
	2009	614.73	220.15	233.65	911.59	263.75	1577.89	-	3,821.76
	2010	465.3	225.22	112.09	249.02	277.10	575.15	583.97	2,487.85
	2011	159.45	274.31	8.71	7.83	34.19	32.94	-	517.43
	2012	116.09	420.01	28.03	-	7.82	-	-	571.95
	2013	52.77	29.63	-	4.15	-	63.61	-	150.16
	2015	-	16.46	-	-	-	-	-	16.46
	2016	6.43	-	-	-	-	-	-	6.43
	<b>TOTAL</b>	<b>1,971.15</b>	<b>1,722.90</b>	<b>871.86</b>	<b>1,721.48</b>	<b>2,085.10</b>	<b>3,270.27</b>	<b>583.97</b>	<b>12,226.73</b>
1.6.2	<b>New Planting area after January 2010</b>				3,166.31 Ha				
1.6.3	<b>Planting Cycle</b>				1 <sup>st</sup> Cycle				
<b>1.7</b>	<b>Description of Mill and Supply Base</b>								
<b>1.7.1</b>	<b>Description of Mill</b>								
	<b>Name of Mill</b>	<b>Capacity (tonnes/ hour)</b>	<b>FFB Processed (tonnes/year)</b>	<b>CPO</b>		<b>Palm Kernel</b>			
				<b>Out put (tonnes)</b>	<b>Extracti on (%)</b>	<b>Out put (tonnes)</b>	<b>Extraction (%)</b>		
	Kendawangan	60	404,490.07	93,840.44	23.19	19,622.49	4.85		
	<i>*Production data source from February 2022 to January 2023</i>								
<b>1.7.2</b>	<b>Description of Certification Scope of Supply Base</b>								
	<b>Name of Estate</b>	<b>Total Area (Ha)</b>	<b>Production Area (Ha)</b>	<b>FFB (ton/year)</b>	<b>Yield (ton/ha/ year)</b>	<b>Supplied to Mill</b>			
						<b>FFB (ton/year)</b>	<b>%</b>		
	Mekar Utama Estate	3,045.92	1,971.15	34,437.31	17.47	34,437.31	100.00		
	Kendawangan Estate	3,520.17	1,722.90	43,084.84	25.01	41,821.42	97.07		
	Sungai Tapah Estate	993.70	871.86	38,448.64	44.10	38,448.64	100.00		
	Seriam Jaya Estate	1,940.94	1,721.48	39,109.23	22.72	36,348.30	92.94		
	Banjar Sari Estate	2,216.78	2,085.10	63,969.07	30.68	63,969.07	100.00		
	Membuluh Sejahtera Estate	3,521.66	3,270.27	65,642.70	20.07	3,979.67	6.06		
	<b>TOTAL</b>	<b>15,239.17</b>	<b>11,642.76</b>	<b>284,691.79</b>	<b>24.45</b>	<b>219,004.41</b>	<b>76.93</b>		
	<i>*Production data source from February 2022 to January 2023</i>								
<b>1.7.3</b>	<b>FFB description from other source</b>								
	<b>Name of sources/Organisation (RSPO certified / non-certified)</b>	<b>Type of Organization</b>	<b>number of smallholders</b>	<b>Production Area (Ha)</b>	<b>Supplied to Mill</b>				
					<b>FFB (tonnes/year)</b>				
	Sungai Bedaun Estate (non-certified)	BGA Group	-	-	44,534.50				
	Koperasi Rimba Sari (non-certified)	Smallholders	395	583.97	6,692.38				
	PT. Putra Sari Lestari (non-certified)	Independent supplier	-	-	3,682.76				
	CV. MITRA DJAYA ABADI (non-certified)	Independent supplier	-	-	4,678.81				
	KEL. TANI SINAR BUKIT KEDIUK (non-certified)	Independent supplier	-	-	2,974.04				

Rio Gunung Panjang (non-certified)	Independent supplier	-	-	18,860.51
Binasari (non-certified)	Smallholders	-	320.00	11,869.87
Koperasi Karya Bersama (non-certified)	Smallholders	451	505.65	10,477.83
Koperasi Usaha Bersama (non-certified)	Smallholders	1.004	800.92	21,914.13
Koperasi Fajar Mandiri (non-certified)	Smallholders	1.588	1,584.39	54,255.20
KSU Setia Hati (non-certified)	Independent supplier	-	-	5,545.65
<b>TOTAL</b>				<b>185,485.67</b>

*\*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	<b>Past Annual Claim Certified Product</b>	<b>Last Year Projected Certified Volume (10 June 2022 – 24 March 2023) (Ton)</b>	<b>Actual Certified Volume from February 2022 to January 2023 (Ton)</b>
	FFB Processed	282,986	229,634.34
	CPO Production	65,155	53,250.70
	Palm Kernel (PK) Production	12,925	11,151.39

**1.8.2 Product selling**

<b>Type of selling product</b>	<b>Actual selling product for last year (February 2022 to January 2023) (MT)</b>
CSPO sold as RSPO certified product	-
CSPK sold as RSPO certified product	2,972.88
CSPO sold under another scheme	-
CSPK sold under another scheme	-
CSPO sold as conventional	51,000.00
CSPK sold as conventional	7,989.77

**1.8.3 Estimate of Certified FFB Claim**

Name of Estates	Total Area (Ha)	Production Area (Ha)	FFB (tones/year)	Yield (tones/ha/year)
Mekar Utama Estate	3,045.92	1,971.15	37,400	18.97
Kendawangan Estate	3,520.17	1,722.90	43,000	24.96
Sungai Tapah Estate	993.70	871.86	21,800	25.00
Seriam Jaya Estate	1,940.94	1,721.48	39,500	22.95
Banjar Sari Estate	2,216.78	2,085.10	39,600	18.99
Membuluh Sejahtera Estate	3,521.66	3,270.27	65,400	20.00
Koperasi Rimba Sari (395 members)	583.97	583.97	12,000	20.55
<b>TOTAL</b>	<b>15,823.14</b>	<b>12,226.73</b>	<b>258,700</b>	<b>21.16</b>

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

**1.8.4 Estimate of Certified Palm Product Claim**

Name of Mill	Capacity (tones/ hour)	FFB Processed (tones/year)	CPO		Palm Kernel		Supply Chain Module
			Out put (tones)	Extraction (%)	Out put (tones)	Extraction (%)	
Kendawangan POM	60	258,700	59,500	23	11,600	4.4	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	-
Others	PT GKG : MUTU-ISPO/084 valid until 04 April 2027 PT GKS : MUTU-ISPO/087 valid until 03 August 2022

**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				
Pundu Nabatindo (PT Windu Nabatindo Lestari)	2014	Pundu Nabatindo	2014	Kotawaringin Timur Regency Kalimantan Tengah	Certified
		Koperasi Harapan Abadi	2023		-
		Kelompok Tani Tenera (Independent Smallholders)	2018	Katingan Regency, Kalimantan Tengah	Certified
		PT Fajar Bumi Nabati (FBI)	2023	Kotawaringin Timur Regency Kalimantan Tengah	-
		PT Gemilang Subur Maju (GSM)	2023		-
Katari Agro (PT Windu Nabatindo Lestari)	2016	Pelantaran Agro Estate	2016	Kotawaringin Timur Regency, Kalimantan Tengah	Certified
		Katari Agro Estate			
		Pantai Mas Estate			
Gunung Makmur (PT Karya Makmur Bahagia)	2014	Gunung Makmur	2014	Kotawaringin Timur Regency, Kalimantan Tengah	Certified
		Sungai Mentaya			
		Bukit Daman			
		KUD Mekar Jaya	2023		-
		KUD Sekar Tani	2023		-
		KUD Lestari	2023		-
		KUD Marga Rahayu	2023		-
		KUD Usaha Bersama	2023		-
		KUD Tani Santoso	2023		-
		PT Tanah Tani Lestari	2023		NPP Audit (2018)
		Koperasi Hapakat (PT TTL)	2023		-
		Koperasi Rika Bersatu (PT TTL)	2023		-

		Koperasi Usaha Bersama (PT TTL)	2023		-
		Koperasi Eka Kaharap (PT TTL)	2023		-
		Koperasi Berkat Usaha Bersama (PT TTL)	2023		-
		Koperasi Bina Tani (PT TTL)	2023		-
		Kelompok Tani Karya Bersama (Independent Smallholders)	2020		Certified
Bukit Makmur (PT Karya Makmur Bahagia)	2019	Bukit Makmur	2014	Kotawaringin Timur Regency, Kalimantan Tengah	Certified
		Bukit Kecubung	2014		Certified
		Sungai Puring (PT Langgeng Makmur Sejahtera)	2023		No NPP have got sanction
		Koperasi Telawang Bersatu	2023		-
		Koperasi Hinje Ate	2023		-
		Koperasi Eka Kaharap (PT LMS)	2023		-
Kotawaringin (PT Bumitama Gunajaya Abadi)	2019	Sepantaian	2023	Kotawaringin Barat Regency, Kalimantan Tengah	No NPP have got sanction
		Danau Merah			
		Kotawaringin			
		Tonam Raya			
Lamandau Mill (PT Bumitama Gunajaya Abadi)	2020	(PT Bumitama Gunajaya Abadi)	2023	Lamandau Regency, Kalimantan Tengah	-
		Kumai Hilir Estate (PT Andalan Sukses Makmur)	2023	Kotawaringin Barat Regency, Kalimantan Tengah	NPP Was Complete
		PT Investa Karya Bhakti	2023	Lamandau Regency, Kalimantan Tengah	NPP Was Complete
		Koperasi Kompak Maju Bersama	2023	Lamandau Regency, Kalimantan Tengah	-
		Koperasi Mitra Bahaum	2023	Lamandau Regency, Kalimantan Tengah	-
		Koperasi Tanjung Biru	2023	Lamandau Regency, Kalimantan Tengah	-
		Koperasi Seberang Jaya Sejati	2023	Lamandau Regency, Kalimantan Tengah	-
		Koperasi Pulai Sejahtera	2023	Kotawaringin Barat Regency, Kalimantan Tengah	-
Kendawangan Mill (PT. Gunajaya Karya Gemilang)	2015	Mekar Utama	2015	Ketapang District, Kalimantan Barat	Certified 2015
		Kendawangan			
		Banjar Sari			
		Seriam Jaya			
		Membuluh Jaya			
		PT Gunajaya Karya Gemilang – 523.422 Ha Additional HGU	2024	Ketapang District, Kalimantan Barat	-

		Koperasi Serba Usaha Bersama	2023	Ketapang District, Kalimantan Barat	-
		Koperasi Binasari			
		Koperasi Serba Usaha Karya Bersama			
		Koperasi Binasari			
		Koperasi Perkebunan Fajar Mandiri			
		Koperasi Rimba Sari			
Suka Damai (PT Rohul Sawit Industri)	2019	PT Masuba Citra Mandiri – 1,567.07 Ha	2019	Rokan Hulu Regency, Riau	Certified 2019
		PT Masuba Citra Mandiri – 326.04 Ha the area which suspect into liability mechanism	2023	Rokan Hulu Regency, Riau	-
		Koperasi Karya Melayu Sejati	2019	Rokan Hulu Regency, Riau	Certified 2019
Pembangunan Raya Mill (PT Agro Sejahtera Mandiri)	2019	PT ASM – 4,861.48 Ha	2019	Ketapang District, Kalimantan Barat	Certified 2019
		KopBun Agro Seriam Mandiri	2019		
		Teluk Rengit (PT Gunajaya Harapan Lestari)	2023	Ketapang District, Kalimantan Barat	-
		PT ASM – 768.72 Ha the area which suspect into liability mechanism	2023	Ketapang District, Kalimantan Barat	-
		Koperasi Bawal Sejahtera Mandiri	2023	Ketapang District, Kalimantan Barat	-
		PT ASM – 494.49 Ha	2023	Ketapang District, Kalimantan Barat	Certified 2020
		Kelompok Tani Sawit Maju Sejahtera (1,022.09 Ha)	2023	Ketapang District, Kalimantan Barat	-
Sungai Rasau Mill (PT Karya Bakti Agro Sejahtera)	2023	Marau Raya	2023	Ketapang District, Kalimantan Barat	ST-1 (2014)
		KUD Rangkong Bertuah	2025	Ketapang District, Kalimantan Barat	Wait for RaCP Approval
		KUD Rasau Tiga Bersama	2025	Ketapang District, Kalimantan Barat	Wait for RaCP Approval
		PT Agriplus	2025	Ketapang District, Kalimantan Barat	Wait for RaCP Approval
Selucing Mill (PT. Windu Nabatindo Abadi)	2023	Serawak Damai (PT Windu Nabatindo Sejahtera)	2023	Central Kalimantan	Wait for RaCP Approval
Sungai Cempaga Mill (PT. Windu Nabatindo Abadi)	2022	PT. Windu Nabatindo Abadi – 103.68 ha	2023	Central Kalimantan	No NPP have got sanction
		PT Nabatindo Karya Utama – 578.59 ha	2022	Central Kalimantan	Certiified
		KSU Sehati Pundu	2025	Central Kalimantan	-
		Koperasi Koling Hapakat	2023	Central Kalimantan	-
Bukit Tunggal Jaya	2020	PT Ladang Sawit Mas	2020	Ketapang District, West	Certified

Mill (PT Ladang Sawit Mas)		KopBun Bukit Tunggal Sejahtera	2023	Kalimantan	-
		KopBun Mitra Perjalanan Permai	2023		-
		PT Lestari Gemilang Intisawit	2023		NPP was complete
		Koperasi Kayong Sekayuk	2023		
		Koperasi Mitra Sejati	2023		-
		PT Ago Manunggal Sawitindo	2023		NPP was complete
		PT Nabati Agro Subur	2023		-
		PT Sejahtera Sawit Lestari	2023		-
		PT Karya Makmur Langgeng	2023		NPP was complete
		PT Gemilang Makmur Subur	2023		NPP on Process
		Koperasi Istana Pawan Mandiri	2023		-
		Koperasi Rungau Sejahtera	2023		-
		PT Damai Agro Sejahtera	2023		NPP on Process
Bukit Belaban Mill (PT Sentosa Prima Agro) **Replanting from Acquisition	2023	PT Sentosa Prima Agro	2023	Ketapang District, West Kalimantan	-
		PT Raya Sawit Manunggal	2023		-
		PT Wahana Hijau Indah	2023		-
		PT Hungarindo Persada	2023		-
	*TBP is approve on 19 December 2022.				
1.10.2	<b>Progress of Associated Smallholders and Out growers for Certifiable Standard</b>				
	<p>The Certificate holder has an agreement with smallholders' scheme, such as:</p> <p><b>GKG</b></p> <ul style="list-style-type: none"> <li>- Usaha Bersama Cooperative: agreement No. 01/PKS-GKG/VIII/2008 dated 25 August 2008</li> <li>- Karya Bersama Cooperative: agreement No. 01/PKS-GKG/VIII/2008 dated 25 August 2008</li> <li>- Binasari Cooperative: agreement No. 01/PKS-GKG/VIII/2008 dated 25 August 2008</li> <li>- Sawit Bersama Cooperative: agreement dated 6 February 2012</li> </ul> <p><b>GKS</b></p> <ul style="list-style-type: none"> <li>- Rimba Sari Cooperative: agreement No. 01/PKS-GKS/V/2017 dated 15 May 2017</li> <li>- Fajar Mandiri Cooperative: agreement dated 27 October 2010</li> <li>- Sawit Makmur Cooperative: agreement No. 001/SKK SM-GKS/IV/2015 dated 5 April 2015</li> </ul> <p>Based on time bound plan, the smallholders will be assessed in 2018 (3 years after the factory is certified). The progress for Certifiable Standard, in some smallholders already have land use rights, for example in the "Koperasi Serba Usaha/ Kelompok Tani Bersama". But until ASA-1.1 the smallholders have not been certified yet, because RaCP still on progress and management unit will be planned audit for smallholders on 2023.</p>				



<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>ASA-1.1</b>	<p>1. <b>Briyogi Shadiwa (Lead Auditor)</b>. 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. <b>Erika Lucitawati (Auditor)</b>. 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. <b>Firda Tarunajaya (Auditor)</b>. Indonesian citizen, graduated in 2010 from the Department of Silviculture, Faculty of Forestry, Bogor Agricultural Institute. He has working experienced for 10 years since 2010 as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The training he has followed namely: Lead Auditor RSPO, Lead Auditor ISPO, Quality Management Systems (ISO 9001:2015) by IRCA, Environmental Management Systems (ISO 14001:2015), ISO 19011:2018, ISO 17021:2011 and ISO 17065:2012. He has experienced in various audit activities related to the certification system of sustainable palm oil plantation since 2021. During this assessment, he performed as Auditor and verified BMP and OHS aspect.</p> <p>4. <b>Sabiah Dhiningtyas Utami (Trainee Auditor)</b>. 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>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
<b>ASA-1.1</b>	<p>Number of auditors: 3 Auditor and 1 auditor trainee          Number of days for <b>ASA-1.1</b> at site: 6 days          Number of working days for <b>ASA-1.1</b> at site: 18 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>ASA-1.1</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Gunajaya Karya Gemilang – Kendawangan POM to the requirements of <b>RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20<sup>th</sup> April 2020 and RSPO Certification Systems for Principles &amp; Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.</b></p> <p>The 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>Some opportunities for improvement of the results ASA-1.1 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA-1.2.</p>



All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.1.

The opening meeting was held on February 06<sup>th</sup>, 2023 at Ketapang Region 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 11<sup>th</sup>, 2023, which was attended by the same participants as the opening meeting. Management PT Gunajaya Karya Gemilang accept all the ASA-1.1 audit results.

The sampling formula uses reference from the RSPO certification system, where sampling is required for a certification assessment, the sampling design shall include all mills and be based on a minimum sample of  $x$  estates, where  $x = (\sqrt{y}) \times (z)$ , where  $y$  is the number of estates and where  $z$  is the multiplier defined by the risk assessment. In this assessment, the samples chosen were Kendawangan Estate, Seriam Jaya Estate, Banjar Sari Estate, Sungai Tapah Estate and Rimba Sari Cooperative.

The assessment program please find Appendix 2

2.2.3	<b>Locations of Assessment</b>
ASA-1.1	<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><b>Kendawangan POM</b></p> <ul style="list-style-type: none"> <li>• <b>Weighbridge station.</b> Interview with 1 worker related to supply chain aspect and worker welfare</li> <li>• <b>Grading Station.</b> Observations and interviews related work procedure, safety aspect, worker welfare etc.</li> <li>• <b>Loading Ramp Station.</b> Observations and interviews related work procedure, safety aspect, worker welfare etc.</li> <li>• <b>Sterilizer Station.</b> Observations and interviews related work procedure, safety aspect, worker welfare etc.</li> <li>• <b>Engine Room.</b> Observation related work procedure, safety aspect, worker welfare, environment aspect etc.</li> <li>• <b>Boiler Station.</b> Observation and interviews related work procedure, safety aspect, worker welfare etc.</li> <li>• <b>Nut &amp; Kernel Station.</b> Observation and interviews related work procedure, safety aspect, worker welfare etc.</li> <li>• <b>Water Treatment Plant.</b> Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.</li> <li>• <b>Empty Bunch, Shell, and Fiber Area.</b> Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.</li> <li>• <b>Composting.</b> Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.</li> <li>• <b>WWTP.</b> Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.</li> <li>• <b>Security Post.</b> Observation and interview related to work procedure, emergency response facility, OHS, worker welfare and supply chain aspect.</li> <li>• <b>Workshop.</b> Observation and interview related to work procedure, OHS and workers welfare aspect.</li> <li>• <b>Hydrant Simulation.</b> Observation and simulation related to fire emergency respond.</li> <li>• <b>Oil Storage.</b> Observation related to storage condition, MSDS, OHS, emergency response facility and hazardous waste management.</li> <li>• <b>Chemical Material Storage.</b> Observation related to storage condition, MSDS, OHS, emergency response facility and hazardous waste management.</li> <li>• <b>General Storage.</b> Observation related to storage condition, material stock, PPE stock, OHS and emergency response facility.</li> <li>• <b>Laboratories.</b> Observation and interview related to work procedure, emergency response facility, OHS, worker welfare aspect.</li> </ul> <p><b>Kendawangan Estate (KNDE)</b></p> <ul style="list-style-type: none"> <li>• <b>Beneficial Plant Block J39, J40, I39, I40 Division 3.</b> Observes Beneficial Plant <i>Turnera Subulata</i></li> <li>• <b>Neprolepis Block J15 Division 2.</b> Observation cover crops.</li> </ul>

- **Harvesting Block I41, I42, I43, I44 Division 3.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **Barn Owl Boxes/Gupon Block I39 Division 3.** Observation Barn Owl Box *Tyto Alba*
- **BGS (BGA Ground Management System).** Observations related to pesticide management.
- **BMS (BGA Manuring System).** Observations related to fertilizer management
- **Fertilizer Block J40 J41 Divisi 3.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **Spraying Block I39 I40 Division 3.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **Loading FFB Block I41, I42 Division 3.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **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.
- **Educational Facility (Kindergarten, Elementary School and Junior High School).** Observation and interview related to school condition, public facility and waste management.
- **Rinse House (BMS and BGS).** Observation related to implementation of procedure, OHS and waste management.
- **Landfill Block J38.** 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.
- **Hazardous Waste Storage.** Observation related to storage condition, hazardous waste stock, OHS, emergency response facility, and 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.
- **Firefighting Simulation.** Observation related to condition the firefighting facilities and equipment and preparedness.
- **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.

#### Sungai Tapah Estate (STHE)

- **Beneficial Plant Block I11, I12 Division 4.** Observes Beneficial Plant *Turnera Subulata*
- ***Neprolepis* Block I41a Division 3.** Observation cover crops.
- **Harvesting Block K18a K17a Division 3.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **Barn Owl Boxes/Gupon Block K19 Division 3.** Observation Barn Owl Box *Tyto Alba*
- **BGS (BGA Ground Management System).** Observations related to pesticide management.
- **BMS (BGA Manuring System).** Observations related to fertilizer management
- **Fertilizer Block H13 H14 Divisi 4.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **Spraying Block I39 I40 Division 3.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **Loading FFB Block I41, I42 Division 3.** Observations and interviews related work procedure, safety aspect, worker welfare etc.

- **Subsidence Poles Block K17 Division 3.** Observations subsidence in plantations with varying peat qualities, depths and drainage circumstances
- **Piezometer Poles Block K17 Division 3.** Water level observation
- **Water Level Poles Block K17 Division 3.** Water level observation
- **HGU Pole No. KSV 007 Block H09 Division 4.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HGU Pole No. ENC 003 Block F14 Division 6.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HGU Pole No. GKG 025 Block H17 Division 4.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **Occupation Area Block F14 Division 6.** Observation of aspect of land dispute potency.
- **Land Application Block G34 Division 5.** Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.
- **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.
- **Rinse House (BMS and BGS).** Observation related to implementation of procedure, OHS and waste management.
- **Landfill.** Observation related to waste management and environmental aspect.
- **Clinic.** Observation and interview related to clinic condition, treatment mechanisms, OHS, and medical waste management.
- **Agrochemical Storage.** Observation related to storage condition, agrochemical stock, 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.
- **Firefighting Simulation.** Observation related to condition the firefighting facilities and equipment and preparedness.
- **Clinic.** Observation and interview related to clinic condition, treatment mechanisms, OHS, and medical waste management.

#### Banjar Sari Estate (BSRE)

- **Beneficial Plant Blok J16 Divisi 2.** Observes Beneficial Plant *Turnera Subulata*
- ***Neprolepis* Blok J15 Division 2.** Observation cover crops.
- **Harvesting Blok J12 J11 Division 2.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **Barn Owl Boxes/*Gupon* Blok J15 Division 2.** Observation Barn Owl Box *Tyto Alba*
- **BGS (*BGA Ground Management System*).** Observations related to pesticide management.
- **BMS (*BGA Manuring System*).** Observations related to fertilizer management.
- **Fertilizer Blok J16 Division 2, I16 Division 3.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **Spraying Blok J14 J15 Division 2.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **EFB Application Blok I17, J15 Division 2.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **Fire Sign Blok K07 Division 02.** Observations related fire management.
- **HGU Pole No. GKS 050 Blok H19 Division 3.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HGU Pole No. GKS 002 Blok K27 Division 1.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **Occupation area Blok L07 Division 1.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.

- **HCV Area Block H15 Division 1.** Observation of aspect of management of HCV area.
- **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.
- **Rinse House (BMS and BGS).** Observation related to implementation of procedure, OHS and waste management.
- **Landfill Block J29.** 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.
- **Fuel Storage.** Observation related to storage condition, OHS and emergency response facility.
- **Firefighting Storage.** Observation related to condition the firefighting facilities and equipment.
- **Firefighting Simulation.** Observation related to condition the firefighting facilities and equipment and preparedness.
- **Clinic.** Observation and interview related to clinic condition, treatment mechanisms, OHS, and medical waste management.

#### Rimba Sari Plantation Cooperative

- **Beneficial Plant Blok H08 Division 1.** Observes Beneficial Plant *Turnera Subulata*
- ***Neprolepis* Blok H09 Division 1.** Observation cover crops.
- **Harvesting Blok E09, F06, H07, H09, H10 Divisi 1.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **Barn Owl Boxes/*Gupon* Blok H10 Division 1.** Observation Barn Owl box *Tyto Alba*
- **Loading FFB Blok H07 Division 1.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **BGS (*BGA Ground Management System*).** Observations related to pesticide management.
- **BMS (*BGA Manuring System*).** Observations related to fertilizer management.
- **EFB Application Blok H08 Division 1.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **Block H03 and F07 Division 1.** Observation of aspect of land demarcation and land dispute potency.

#### Seriam Jaya Estate of PT GKS

- **HGU Pole No. GKS 101 Blok R04 Division 4.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HGU Pole No. GKS 102 Blok Q05 Division 4.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HGU Pole No. GKS 156 Blok R08 Division 4.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HGU Pole No. GKS 157 Blok Q09 Division 4.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **Occupation area Blok S19/S20 Division 4.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HCV Area Membuluh River.** Observation of aspect of management of HCV area.
- **Employee Housing Complex Blok O19 and O24.** 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 (Kindergarten).** Observation and interview related to school condition, public facility and waste management
- **Rinse House (BMS and BGS).** Observation related to implementation of procedure, OHS and waste management.
- **Landfill Block N38 (at MSJE unit).** 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.
- **Hazardous Waste Storage.** Observation related to storage condition, hazardous waste stock, OHS, emergency response facility, and waste management.
- **Firefighting Storage.** Observation related to condition the firefighting facilities and equipment.
- **Firefighting Simulation.** Observation related to condition the firefighting facilities and equipment and preparedness.
- **Clinic.** Observation and interview related to clinic condition, treatment mechanisms, OHS, and medical waste management.

**Stakeholder consultation interviewed:**

- Village of Mekar Utama
- Village of Kendawangan Kiri
- Village of Banjarsari
- Village of Seriam
- Labor Agency of Ketapang Regency
- Agriculture Agency of Ketapang Regency
- Environmental Agency of Ketapang Regency
- National Land Agency of Ketapang Regency

<b>2.3</b>	<b>Stakeholder Consultation and Stakeholders Contacted</b>
<b>2.3.1</b>	<b>Summary of stakeholder consultation process.</b>
<b>ASA-1.1</b>	<p>Summary of stakeholder consultation process            Consultation of stakeholders for PT Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa was held by:</p> <ul style="list-style-type: none"> <li>• Public Notification on website on 14 November 2022</li> <li>• Public consultation meeting with government institution on 07 February 2023</li> <li>• Public consultation meeting with communities on 07 February 2023</li> <li>• Public consultation meeting with internal stakeholders on 7–10 February 2023</li> <li>• Public Consultation with NGO (WWF, WALHI, Sawit Watch and AMAN) on 31 January 2023.</li> </ul> <p>Numbers of input from stakeholders were clarified by PT Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa</p>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	<i>Please find appendix 1</i>
<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit ASA-1.2 will be conducted eight (8) months to twelve (12) months after date of annual license



**3.0 ASSESSMENT FINDINGS**

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

MUTUAGUNG LESTARI has conducted an assessment of Kendawangan POM – PT Gunajaya Karya Gemilang subsidiary of Bumitama Agri Ltd. operation consisting of one (1) mill and three (7) oil palm estates.

During the assessment, there were there were 1 non-conformity with Major category and four (4) opportunity for improvement were identified.

MUTUAGUNG LESTARI found that Kendawangan POM – PT Gunajaya Karya Gemilang subsidiary of Bumitama Agri 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 Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.**

Therefore, MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is continued

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>		
<p><b>1.1</b>  <b>The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</b></p>		
<p><b>1.1.1</b>            Unit of certification has types of documents and information that can be accessed by the public listed in the “<i>SOP Komunikasi</i>” No. BGA-SUST-SOP-09 Rev. 00 was approved by Regional Head 2 dated 08 September 2017. In the procedure, the part is “<i>kebijakan pengendalian dokumen/informasi</i>”, that documents that can be accessed by the public include:</p> <ul style="list-style-type: none"> <li>• Land Use Title, Environmental Permit, and Environmental Management and Monitoring Plan.</li> <li>• Company Policies and Manuals.</li> <li>• HSE and social improvement programs.</li> <li>• HCV documents and SIA documents.</li> <li>• Details of grievance and complaints</li> <li>• Summary of general reports on the results of certification assessments.</li> <li>• Etc.</li> </ul> <p>All public documents are placed in mill and estate office. For example, unit of certification also provides information to relevant stakeholder routinely, for example mandatory reports have been delivered to relevant agency and it has been confirmed during public consultations with relevant agencies.</p> <p><b>1.1.2</b>            Based on document review, unit of certification has <i>SOP Komunikasi</i>” No. BGA-SUST-SOP-09 Rev. 00 was approved by Regional Head 2 dated 08 September 2017. In the procedure, the person in charge for receiving of request of information, types of documents that can be accessed by the public and regulates the time frame for responding to of request of information. Documents that can be accessed by internal and external stakeholders, among others: Land use title, environmental permit, and environmental management and monitoring plan, company policies and manuals, HSE and social improvement programs, HCV documents and SIA documents, details of grievance and complaints, etc. 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 interviews result with internal and external stakeholders including workers, local community representatives, and relevant agencies in Ketapang Regency, it is known</p>		

that they have known the mechanism for communication and request of information with the unit of certification.

### 1.1.3

Unit of certification has documented incoming and outgoing letter from external stakeholder in “*Buku Surat Masuk dan Keluar*” and “*Log Book Surat Masuk-Surat Keluar CSR PT GKG dan GKS Tahun 2022*”. Based on that document, there were incoming letter in kind of request of information and fund. Unit of certification also records the response of incoming letter. Based on document verification, unit of certification has responded to all incoming mails in accordance with its procedure which is no more than 15 days. For example, incoming letter and its respond by unit of certification have shown below:

- Letter on 3 February 2023 No. P/015/Ekbansos-G470/III/2023 from Head of Kendawangan District about request for confirmation of farmers candidate in cooperative of PT GKS and was responded by unit of certification on 3 February 2023.
- Letter on 8 November 2022 No. B/265/XI/YAN.2.14/2022 from Police Office of Kendawangan about request for construction building and responded on 22 November 2022 and implemented based on document No. 018/REG-4/GKG/CSR/12/2022 on 15 December 2022.
- Letter on 5 December 2022 from Kendawangan District Office about request for Christmas fund and responded on 20 December 2022 and implemented based on document No. 012/REG-4/GKG/CSR/12/2022 on 20 December 2022.
- Letter on 8 November 2022 from SDN 03 Kendawangan about request for school utility and responded on 22 November 2022 and implemented based on document No. 010/REG-4/GKG/CSR/12/2022 on 09 December 2022.

### 1.1.4

Procedure for communication and consultation is listed on *SOP Komunikasi* authorized by the Regional Head on 08 September 2017. In the procedure, the flowchart of the consultation/dialogue mechanism with the community is explained. The Management Unit submits a plan of consultation/dialogue with the community in writing through the Village Head/Customary Chair/Community Leader or local government apparatus, then the response from the Village Head/Customary Chair/Community Leader or Mediator (Government Apparatus), Head Office Management/related parties provide written positive responses (at most 15 days), consultation/dialogue forums facilitated by CSR/Unit Management, meeting results are distributed to relevant parties by the relevant Management Unit, follow up on the results of consultations/dialogues with the community by CSR/Management Units related to the interests. According to Area Controller of Region 6 Decree No. 085/GKG-AC/SK/V/2015 dated 02 May 2015, it was known that PIC on information and communication was carried out by CSR Assistant, recorded on Letter-In and Letter-Out Logbook. Unit of certification stated that some data or information might be confidential and need approval from top management to be released for special purposes for example during Court process.

Procedures for consultation mechanisms have been socialized to workers and the surrounding community, as for example socialization was carried out on 09 August 2022 in Kendawangan District and participated by 50 participants and on 19 January 2023 in Mekar utama Village which was participated by 47 participants. Besides, based on field observation result, socialization is carried out in form of banners instalment equipped with pictures of consultation and communication flowcharts in unit. Based on the results of consultations with Banjarsari Village, Seriam Village, Mekar Utama Village Kendawangan Kiri Village, Cooperative of Fajar Mandiri and government agencies of Ketapang District, it was known that interviewee has familiar with company PIC for public relation affairs, with perception that communication process has considered satisfactory.

### 1.1.5

Unit of certification has list of stakeholders which is issued on 04 January 2023 which informs the name of PIC, telephone number that can be contacted, as well as their addresses. External stakeholders are on the list including:

- 13 representatives from Kendawangan District (Head of Village, Head of Sub District (*Camat*), Sector Police Station, etc.).
- 12 representatives from Ketapang Regency (Government Agencies, District Hospital, Resort Police Station, Army of District Office, etc.).
- 12 contractors (transportation, field upkeep, FFB supplier, and EFB application).
- 15 representatives of Smallholder Cooperatives, i.e.: KSU Bersama, KSU Karya Bersama, Cooperative of Binasari, Cooperative of Fajar Mandiri and Cooperative of Rimbahari.
- 10 public figures of Kendawangan District.
- 4 third parties of hazardous and toxic waste transporter, environmental testing, etc.
- 5 representatives from internal stakeholders (*LKS Bipartit*, worker cooperative and gender committee).

This list will be updated if there are changes to stakeholders. Auditor verified by conducting a public consultation using the telephone

number registered in the stakeholder list, and it was known that the number could be contacted by the auditor, such as FFB supplier, government agencies, etc.

**Status: Comply**

**1.2**

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

**1.2.1**

The unit certification showed commitment to ethical behaviour is contained in the Code of Conduct Number BGA-COC-HC-333.1-R0 which was ratified on October 28<sup>th</sup>, 2014, by the Board of Directors. The policy consists of 5 chapters, namely:

- Introduction
- Basic principles of Good Corporate Governance (GCG): Transparency, Accountability, Responsibility, Independence, Fairness and Equality.
- Company ethical standards towards stakeholders (workers, surrounding communities, government, business partners, suppliers/contractors, mass media and shareholders)
- Code of conduct for BGA Group employees, for example:
  - Respect for human rights in accordance with applicable laws and regulations
  - Maintain and care for occupational safety and health
  - Prohibition of immoral behaviour, narcotics, illegal drugs, gambling and smoking
  - Avoid personal conflicts of interest (insider transactions)
  - Prohibition of giving and receiving gifts, favors or other facilities.
  - Conflict of interest
  - Etc.
- Enforcement and reporting
  - Commitment to uphold the code of conduct
  - Violation
  - Violation reporting mechanism
  - Sanctions and consequences

Socialization regarding this policy has been carried out in every estate and factory unit, for example socialization at the KNDE unit on January 5<sup>th</sup>, 2022, and at the BSRE unit on August 18<sup>th</sup>, 2022. This socialization has also been carried out to external stakeholders at the time of contract signing and morning assembly/ safety briefing before starting work.

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.

**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 company also routinely conducts financial audits conducted by auditing public accountants as indicated in the financial statements of PT Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa on December 31<sup>st</sup>, 2021. The results of the report note that the financial statements are presented fairly, in all material respects, financial position and financial performance and cash flows for the year ended on that date, in accordance with Indonesian Financial Accounting Standards.

In addition, there is a Whistle Blowing System that determines the flow of complaints/reports of violations to all employees, without worry, willing to convey the possibility of fraudulent practices occurring within the certification unit. Based on the results of interviews with workers in the sampling unit, it was stated that workers know about company policies to respect human rights, commitment to ethical behaviour in all work operations and the Whistle Blowing System. Then, there is a statement from a third party (contractor/supplier) who works with the unit of certification that has been given socialization regarding the code of ethics and the Whistle Blowing System before ratifying the cooperation agreement. This is done to ensure that before cooperating with the certification unit, his party does not commit any violations or can report violations if the certification unit commits violations during



cooperation.

Over the past year there have been reports regarding violations of business ethics practices committed by workers in the BSRE unit, namely embezzling company property as reported in the Pontianak City Post online media (<https://www.postkotapontianak.com/driver-dump-truk-96-pt-gunajaya-karya-gemilang-bga-group-sentenced-one-year-prison/>). This is explained in detail in section 3.5 Summary of Arising Issues from Public and Auditor Verification.

**Status: Comply**

**PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS**

**2.1**

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

**2.1.1**

The Kendawangan POM Certification unit is under the unit of Certification PT Gunajaya Karya Gemilang, in compliance with the terms the unit of certification has complied with all relevant laws and regulations, namely by having the following documents

• **BMP Aspect**

- 1<sup>st</sup> Triwulan 2022 of LPUPPT. GKG to Plantation Agency Ketapang Regency on 15 March 2022
- 2<sup>nd</sup> Triwulan 2022 of LPUPPT. GKG to Plantation Agency Ketapang Regency on 7 July 2022
- 3<sup>rd</sup> Triwulan 2022 of LPUPPT. GKG to Plantation Agency Ketapang Regency on 7 October 2022
- 4<sup>th</sup> Triwulan 2022 of LPUPPT. GKG to Plantation Agency Ketapang Regency on 4 January 2023
- 1<sup>st</sup> Triwulan 2022 of LPUPPT. GKS to Plantation Agency Ketapang Regency on 15 Maret 2022
- 2<sup>nd</sup> Triwulan 2022 of LPUPPT. GKS to Plantation Agency Ketapang Regency on 7 July 2022
- 3<sup>rd</sup> Triwulan 2022 of LPUPPT. GKS to Plantation Agency Ketapang Regency on 7 October 2022
- 4<sup>th</sup> Triwulan 2022 of LPUPPT. GKS to Plantation Agency Ketapang Regency on 4 January 2023.
- Has conduct zero burning for land preparation/replanting.
- Has committed to reduce and avoid the use of pesticide, especially those that classified on WHO 1A, 1B and Paraquat. Furthermore, all pesticides used were registered in Pesticide Commission of Department of Agriculture.
- Has used seeds from producers recognized by Government of Indonesia.
- Unit of certification has adopted integrated pest management which consist of early warning system, census, biological control, chemical control with justification and evaluation.

• **OHS Aspect**

- 1<sup>st</sup> Triwulan 2022 of OHS Committee of PT. GKG report to Labour Agency Ketapang Regency on 13 Mei 2023
- 2<sup>nd</sup> Triwulan 2022 of OHS Committee of PT. GKG report to Labour Agency Ketapang Regency on 24 September 2023
- 3<sup>rd</sup> Triwulan 2022 of OHS Committee of PT. GKG report to Labour Agency Ketapang Regency on 28 September 2023
- 4<sup>th</sup> Triwulan 2022 of OHS Committee of PT. GKG report to Labour Agency Ketapang Regency on 31 January 2023
- 1<sup>st</sup> Triwulan 2022 of OHS Committee of PT. GKS report to Labour Agency Ketapang Regency on 13 Mei 2023
- 2<sup>nd</sup> Triwulan 2022 of OHS Committee of PT. GKS report to Labour Agency Ketapang Regency on 24 September 2023
- 3<sup>rd</sup> Triwulan 2022 of OHS Committee of PT. GKS report to Labour Agency Ketapang Regency on 28 September 2023
- 4<sup>th</sup> Triwulan 2022 of OHS Committee of PT. GKS report to Labour Agency Ketapang Regency on 31 January 2023
- Has provided PPE for all employees in accordance with the risk analysis and is provided for Free
- Involve employees in health insurance and employment insurance programs (*BPJS TK and BPJS Kesehatan*)
- Equipping operators with required competencies, for example license for lift operators and power plant operators

• **Environmental Aspect**

- Has been implements the requirement of environment aspect such as EIA management and monitoring in routinely.
- Has been manage the hazardous waste, POME and domestic waste in accordance with applicable regulation.
- Land preparation without burning and has the infrastructure in fire anticipation, according to *Permentan* Number. 26 of 2007 section 15.

• **Worker Welfare Aspect**

- Employment Report (*WLTk*) of unit KNDM PT GKG with register number 78862.20220818.0001, reporting date on August 18<sup>th</sup>, 2022, obligation to report back on August 18<sup>th</sup>, 2023.

- Employment Report (*WLTK*) of unit KNDE PT GKG with register number 78862.20220818.0001, reporting date on August 18<sup>th</sup>, 2022, obligation to report back on August 18<sup>th</sup>, 2023.
  - Employment Report (*WLTK*) of unit STHE PT GKG with register number 78862.20220818.0007, reporting date on August 18<sup>th</sup>, 2022, obligation to report back on August 18<sup>th</sup>, 2023.
  - Employment Report (*WLTK*) of unit MUTE PT GKG with register number 78862.20220704.0001, reporting date on July 4<sup>th</sup>, 2022, obligation to report back on July 4<sup>th</sup>, 2023.
  - Employment Report (*WLTK*) of unit MKNR PT GKG with register number 78862.20220818.0002, reporting date on August 18<sup>th</sup>, 2022, obligation to report back on August 18<sup>th</sup>, 2023.
  - Employment Report (*WLTK*) of unit BSRE PT GKS with register number 78862.20220818.0003, reporting date on August 18<sup>th</sup>, 2022, obligation to report back on August 18<sup>th</sup>, 2023.
  - Employment Report (*WLTK*) of unit SJYE PT GKS with register number 78862.20220818.0005, reporting date on August 18<sup>th</sup>, 2022, obligation to report back on August 18<sup>th</sup>, 2023.
  - Employment Report (*WLTK*) of unit MSJE PT GKS with register number 78862.20220818.0006, reporting date on August 18<sup>th</sup>, 2022, obligation to report back on August 18<sup>th</sup>, 2023.
  - The company has complied with the implementation of minimum wages for all employees in accordance with applicable regional regulations (West Kalimantan Governor's Decree on District/City Minimum Wages in Ketapang Regency, West Kalimantan Province year of 2022 and 2023).
  - All employees have been registered in *BPJS* of Employment social security.
- **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.

**2.1.2**

The certification unit has SOP *Identifikasi dan Audit Pemenuhan Aturan Dan Persyaratan Hukum Yang Berlaku* (BGA-SOP-CCS-1102.1-R0). 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 CCS (Corporate Communication Sustainability) Department and the Legal Department. Law register audits are conducted every 6 months or at certain times deemed necessary. The last audit conducted on 1 January 2023, which already update latest regulation such as *Peraturan Gubernur Kalimantan Barat No. 1359 Tahun 2022 Tentang Upah Minimum Provinsi dan Upah Minimum Kabupaten Ketapang Kalimantan Barat Tahun 2023 Rp 3,085,615*.

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

- Salary slips for contractor worker CV Kawira Putra with the initials ZK who received a basic wage in December 2022 of IDR 2,876,252.
- Salary slips for contractor workers PT Suri Adidaya Kapuas with the initials UHA who received a basic wage in December 2022 of IDR 2,876,252.
- Based on the results of a review of the contractor's workforce list documents and interviews with contractors and management representatives, it is known that all contractor workers have participated in health insurance in the *KIS* (Healthy Indonesia Card) program which is intended for the underprivileged.

**2.1.3**

The company has a map that showing the location of the boundary poles in each estate. The company has also monitored the HGU boundary pole in January 2023 by showing the results of monitoring record "Monitoring Patok HGU – PT Gunajaya Ketapang Sentosa & PT Gunajaya Karya Gemilang", where the monitoring results are in accordance with the maintenance procedures (GKG-GKS - GIS-SOP-01, November 10, 2022). The procedures include stating that the GIS Region Team and Certification & Compliance Dept. 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 1 x 4 months. The results of field observations on the boundary pole for example No. 101 & 102 (Seriam Jaya Estate), No. 044 & 042 (Kendawangan Estate), No. 179 (Sungai Tapah Estate) and No. 50 (Banjarsari Estate) are found and that the condition of the boundary poles is well maintained.

**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 FFB transporters, B3 waste contractors, etc. The unit of certification has shown a list of contractors for the 2022 period, which are as follows:

- Contractor Sulianto Harun (CV Kawira Putra), Cooperation in CPO transportation.
- H. Syahrudin (PT Suri Adidaya Kapuas), Cooperation in PK transportation.
- PT Semesta Langgeng Sentosa, Cooperation in the transportation of LB3.
- Erwin Irawan/Amran (KSU Setia Hati) as a FFB supplier.
- Dedi Setiawan (Rio Gunung Panjang) as a FFB supplier.
- Hendra/ H. Sirin (Sinar Bukit Kediuk) as a FFB supplier.

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

- Work agreement letter number 001/SPKS/KNDM/IV/2022 between CV Kawira Putra and PT GKG for the work of transporting CPO. The work agreement is valid from April 4<sup>th</sup>, 2022, to April 3<sup>rd</sup>, 2023.
- Work agreement letter number 002/SPKL/KNDM-TBS/XII/2021 between CV Mitra Djaya Abadi and PT GKG for the sale and purchase of FFB. The work agreement is valid from January 1<sup>st</sup>, 2022, to December 31<sup>st</sup>, 2022.

**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 CPO transportation work agreement document between the certification unit and PT CV Kawira Putra number 001/SPKS/KNDM/IV/2022 dated April 4<sup>th</sup>, 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:

- Salary slips for contractor worker CV Kawira Putra with the initials ZK who received a basic wage in December 2022 of IDR 2,876,252.
- Salary slips for contractor workers PT Suri Adidaya Kapuas with the initials UHA who received a basic wage in December 2022 of IDR 2,876,252.
- Based on the results of a review of the contractor's workforce list documents and interviews with contractors and management representatives, it is known that all contractor workers have participated in health insurance in the *KIS* (Healthy Indonesia Card) program which is intended for the underprivileged.

Based on the results of interviews with local contractors (PT Suri Adidaya Kapuas), 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 fulfillment 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 FFB contractor/supplier work agreement document, for example the CPO transport work agreement letter number 001/SPKS/KNDM/IV/2022, it is explained that the FFB contractor/supplier is required to provide PPE for its workers, guarantee and include all workers in the BPJS program *BPJS* of Employment and *BPJS* Health, do not employ children under the age of 18, do not practice forced labor and illegal labor. Then based on interviews with the contractor (PT Suri Adidaya Kapuas), 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 fulfillment of HSE requirements (PPE and OHS rules in the company). For example, the work evaluation document for contractor Sulianto Harun (CV Kawira Putra) with work agreement letter number 001-WIL-6A/GKG/SPK/XI/2022 for the assessment period in November 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. Supplier data has also been equipped with geolocation information, land ownership status to plantation addresses. The company also shows the number of suppliers who are direct suppliers to POM as many as 9 suppliers, here are some of them:

- Supplier: CV Mitra Raya Sejati
  - Address: *Sungai Besar, Kecamatan Matan Hillir*
  - Status: Uncertified
  - Coordinate point: Longitude 110,132 & Latitude -1,971237
  - Land ownership status: *SHM*
- Supplier: Rio Gunung Panjang
  - Address: *Desa Kendawangan Kiri, Kecamatan Kendawangan*
  - Status: Uncertified
  - Coordinate point: Longitude 110,2068 & Latitude -2,491434
  - Land ownership status: *SHM*

In this data, there is quite clear information related to FFB suppliers, such as geolocation, land ownership status to addresses and certification status.

**2.3.2**

From the recorded data on FFB receipts for the 2021/2022 period, it is known that the company received FFB from many collectors, for example in the name of CV Mitra Djaya Abadi. The company is able to show location and land ownership data for FFB origins that are received by each of these collection agents. There are 95 suppliers indirectly sending FFB to these collectors with complete information regarding geolocation, address and land ownership status. In terms of calculation, the total FFB sent also corresponds to the number of existing suppliers.

**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 records of short-term planning, mid-term plan, and long-term plan:

DESCRIPTION	2023 (Tons)	2024 (Tons)	2025 (Tons)	2026 (Tons)	2027 (Tons)
<b>PT. GKG:</b>					
- TBS	108,662	112,349	113,903	115,965	125,243
- CPO	25,862	26,964	27,337	28,411	30,685

- Kernels	4,890	5,056	5.126	5.218	5,636
<b>PT. GKS:</b>					
- TBS	168,418	174,134	176,542	179,738	194,118
- CPO	40,084	41,792	42,370	44,036	47,559
- Kernels	8,344	8,761	9,199	9,659	10.142

FFB production and FFB processing produced by PT. GKG and PT. GKS includes production from scheme smallholders (Rimba Sari Cooperative included BSRE)

The unit of certification has been inspection disclosed finances in the financial audit report for the period December 31<sup>st</sup>, 2021 Number 00241/2.1032/AU.1/01/1174-3/1/III/2022 on 18 March 2022 conducted by the Public Accounting Firm with an opinion on the Report finance attached serve in a manner fair , deep all material things , position finance PT. Gunajaya Karya Gemilang as of December 31<sup>st</sup>, 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 report on the results of a financial audit for the financial year for the period December 31<sup>st</sup>, 2021 Number 00240/2.1032/AU.1/01/1174-3/1/III/2022 on March 18<sup>th</sup>, 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. Gunajaya Ketapang Sentosa December 31<sup>st</sup>, 2021, and 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**

Based on the statement area data of PT. GKG and PT. GKS It is known that planting years are between 2007 and 2016. In addition, in the company agronomic procedures related to replanting Number BGAAGRKS-SOP-17 it is known that replanting can begin after the plants are 25 years old, which is around 2032, so this indicator cannot be applied.

**3.1.3**

The CH review management in a manner periodically both in the Estate and in POM including review management annual for evaluate operational. Overview management among them conducted at BSRE, KNDE, SJYE and STHE for evaluate achievement results Work year 2022.

Management review is conducted as one of the annual evaluations, for example management review is conducted on January 28, 2023.

In 2023 BSRE has a target of 79,858 tons of FFB production with a yield of 33.59 tons/ha with method guard adequacy harvester, improvement of soil moisture, ground management and canopy management, excellent biowaste management (EFB and boiler ash ), as well acceleration of areas of need improvement.

In 2022 SJYE has sufficient area conditions Good 96% of Path and free Collection Point from weeds as well as condition wicket 85% in maintained.

STHE evaluates the achievement of production in 2022 with very good results of 98%. This is due to the fact that the unit has maintained sufficient manpower, maintaining effective workdays of above 95% and normal production rotation of 7 days throughout the year.

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

**Status: Comply**

**3.2**

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

**3.2.1**

The CH 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 develops guidelines for workers by providing systematic training for continuous improvement. A number of evidence that has applied for repair sustainable includes:

- The company no longer uses pesticides with the active ingredient paraquat.
- The company has implemented biological pest control in this case by using host plants and owls to reduce the use of pesticides, especially insecticides and rodenticides.
- Management and monitoring of fires in the company's border areas that benefit the community.
- Waste management and monitoring through WWTP pool 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 and ground water through testing raw quality
- Greenhouse Gas Management and use of land clearing with a mechanical policy and no burning.
- Well drill for fulfil supply of clean water for housing area employee
- 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 CH has own procedure operational consisting including Agronomy issued by company Director on 25 May 2011 and Factory SOPs Palm Oil Mill issued by COO, CSO and CFO on 17 January 2013. In procedure Agronomy the arranged among them nursery (SOP-01), preparation land (SOP-02), installation and maintenance roads and bridges (SOP-03), installation and maintenance system drainage (SOP-04), water and soil conservation (SOP-05), planting legumes or LCC (SOP-06) and planting oil palm (SOP-07), weeding (SOP-08), fertilization (SOP-09) and control pest integrated (SOP-10), castration and management canopy (SOP-11), census production oil palm and FFB (SOP-12), harvesting (SOP-13), management pesticides (SOP-14), management transportation (SOP-15), management land marginal (SOP-16) and replanting (SOP-17).

In procedures at POM include: consists from Bridge Weigh (BGA-SOP-OP-1001.1-RO), Loading Ramp (BGA-SOP-OP-1002.1), Sterilizer (BGA-SOP-OP-1002.2), Thresher (BGA-SOP-OP-1002.3), Digester and Press (BGA-SOP-OP-1002.4), Clarification ( BGA-SOP-OP-1002.5), Nut and Kernel Separation (BGA-SOP-OP-1002.6), Boiler (BGA-SOP-OP-1002.7) and Supply Power (BGA-SOP-OP-1002.8), Storage Tank and Bulk Silo (BGA-SOP-OP-1002.9), Final Effluent (BGA-SOP-OP-1002.10), Commodity Dispatch (BGA-SOP-OP-1002.11) , Water Treatment (BGA-SOP-OP-1002.12), Maintenance Factory (BGA-SOP-OP-1002.13) and Laboratory Factory (BGA-SOP-OP-1002.14).

In practice the operation of the unit of certification refers to all SOPs and other internal policies that have been validated and promulgated to all existing units

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

**3.3.2**

The CH has a mechanism to check consistently the implementation of procedures among them there is in internal office memo No. Related 078/IOM/QAO-BGA/VIII/2020 Assessment of Quality and Discipline SOP, BHS, BMS, BGS indexes approved by the COO

of PT. BGA dated December 5<sup>th</sup>, 2012. The procedure explained several things, for example:

- There is capable of adjusting BHS, BMS and BGS Assessment parameters push success achievement of quality standards in the field
- There is a correlation between the value of harvesting performance with the level of harvest losses
- SOP Harvesting index discipline improvement
- Better manuring quality
- Developed good ground management
- Distribution BGS assessment into 2 stages: Stage 1 checked at the moment implementation spray For inspection Nozzle suitability, usage materials and BGS SOP index, Stage 2 was examined at 14 days after spray For evaluation spray.

As example there is results BGS inspection carried out by the QA Department on December 3<sup>rd</sup>, 2022, in Blocks J24a and J25a Division 2 KNDE, that implementation process found spray Still bad Because Still found death weeds that do not even and clean weeds in the yard No off 100% as well Still Faulty PPE found. As for the fix that is with give reprimands and sanctions When employees No using PPE and simulation done appropriate target at employees who do not understand how correct spray.

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 has records of monitoring and follow-up carried out on the results of studies and evaluations of plantation and factory operations. Some of the monitoring records and follow-up improvements include operational improvements related to the quality of FFB sent to the factory, maintenance at each station in the processing of FFB at the factory to minimize losses, recapitulation of work accident reports which are carried out routinely once every 1 month, forming a preparedness and response structure emergencies to anticipate emergency situations, establishing a OHS committee structure responsible for occupational health and safety, placing OHS warnings and monitoring the updating of legal documents.

Based on the description above, it shows that the unit of certification has carried out monitoring and follow-up on the results of the evaluation of plantation and factory operations

**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

- *Dokumen Pengelolaan dan Pemantauan Lingkungan* (DPPL) in 2010 has been covered area of 10,000 Ha with mill capacity of 60 tonnes of FFB/hour. The DPPL has been approved based on Decree of Governor of Kalimantan Barat Number: 561/BLHD/2010 concerning Approval of *Dokumen Pengelolaan dan Pemantauan Lingkungan* (DPPL) for Plantations and Palm Oil Mill (Mill Capacity 60 tonnes/hour) for an Area of 10,000 Ha which Has Been Opened by PT Gunajaya Karya Gemilang in Kendawangan District, Ketapang Regency, Kalimantan Barat Province on 13 December 2010.
- *Dokumen Pengelolaan dan Pemantauan Lingkungan* (DPPL) in 2010 has been covered area of 10,000 Ha with mill capacity of 60 tonnes of FFB/hour. The DPPL has been approved based on Decree of Governor of Kalimantan Barat Number: 562/BLHD/2010 concerning Approval of *Dokumen Pengelolaan dan Pemantauan Lingkungan* (DPPL) for Plantations and Palm Oil Mill (Mill Capacity 60 tonnes/hour) for an Area of 10,000 Ha which Has Been Opened by PT Gunajaya Ketapang Sentosa in Kendawangan District, Ketapang Regency, Kalimantan Barat Province on 13 December 2010.

#### Social Impact Assessment

- Social Impact Assessment of PT Gunajaya Karya Gemilang in 2020 prepared by *Lingkar Komunitas Sawit*. The assessment was carried out based on the results of focus group discussion which involved the surrounding community, namely representatives from Kendawangan Kiri Village, Mekar Utama Village, and Banjarsari Village along with employee representatives at PT Gunajaya Karya Gemilang on 13-19 December 2019.

- Social Impact Assessment of PT Gunajaya Ketapang Sentosa in 2020 prepared by *Lingkar Komunitas Sawit*. The assessment was carried out based on the results of focus group discussion which involved the surrounding community, namely representatives from Seriam Village and Banjarsari Village along with employee representatives at PT Gunajaya Ketapang Sentosa on 14-19 December 2019.

#### **HCV Assessment**

- Final Report on Identification and Analysis of Existence of High Conservation Values (HCV) in Permit Area of PT Gunajaya Karya Gemilang on 27 August 2012. The study was conducted by Faculty of Forestry IPB using reference to 2008 HCV toolkit, with field data collection dates on 13-15 March 2011. Based on the results of identification, area of 114.70 Ha of HCV was obtained.
- Final Report on Identification and Analysis of Existence of High Conservation Values (HCV) in Permit Area of PT Gunajaya Ketapang Sentosa on 27 August 2012. The study was conducted by Faculty of Forestry IPB using reference to 2008 HCV toolkit, with field data collection dates on 16-17 March 2011. Based on the results of identification, area of 19,56 Ha of HCV was obtained.

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:

##### **Social Impact Assessment (SIA)**

Social monitoring and management plan has been included in social impact assessment in 2020 as follows.

- Social Impact Assessment of PT Gunajaya Karya Gemilang in 2020 prepared by *Lingkar Komunitas Sawit*. The assessment was carried out based on the results of focus group discussion which involved the surrounding community, namely representatives from Kendawangan Kiri Village, Mekar Utama Village, and Banjarsari Village along with employee representatives at PT Gunajaya Karya Gemilang on 13-19 December 2019.
- Social Impact Assessment of PT Gunajaya Ketapang Sentosa in 2020 prepared by *Lingkar Komunitas Sawit*. The assessment was carried out based on the results of focus group discussion which involved the surrounding community, namely representatives from Seriam Village and Banjarsari Village along with employee representatives at PT Gunajaya Ketapang Sentosa on 14-19 December 2019.

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 13-19 December 2019. The event was attended, among others, by head of villages, community leaders, public health of Kendawangan District, and others. 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 included components such as socialization of unit of certification's procedure related to external relation, land claim settlement, CSR program improvement, response for complaint if any from surrounding community, mentoring independent smallholders as FFB suppliers, OHS and worker procedure socialization to unit of certification's workers, extrafooding for sprayer and manuring worker, social assurance for worker, and others.

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, educational infrastructure (schools), 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 Kendawangan Kiri Village, Seriam Village, Banjarsari Village, and Mekar Utama 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.

#### **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 Gunajaya Karya Gemilang dan PT Gunajaya Ketapang Sentosa. 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 Kendawangan Kiri Village, Seriam Village, Banjarsari Village, and Mekar Utama 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.

#### **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:

#### **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 Kendawangan Kiri Village, Seriam Village, Banjarsari Village, and Mekar Utama 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. The assistance provided has covered all levels of society and all impacts also has been covered in program established by unit of certification.

**Environmental Impact Assessment (EIA)**

Unit of certification involves Environment Agency and Ministry of Environment and Forestry to monitor result of environmental management that has been carried out by the unit of certification in the form of presenting environmental management and monitoring implementation reports and other environmental management documents sent every certain period which can be proven in indicator 1.1.2. The company also does not block access to all environmental agencies if they are going to carry out field verification to their management areas. It aims to obtain advice and advice in carrying out environmental management in accordance with the vision, mission, and government programs so that they can run synergistically. This can be proven based on the results of interviews with Public Housing, Settlement Areas and Environmental Agency of Ketapang Regency. Monitoring and updating related to environmental impact management is also carried out in conjunction with an evaluation of HCV management which is described in more detail in indicator 7.12.4. However, in general, all recommendations from the evaluation of HCV management carried out in a participatory manner will be carried out in line with the management and monitoring of environmental impacts.

**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 Employee Recruitment and Selection number BGA-SOP-HC-304.1-R0
- Employee Promotion SOP number BGA-Sop-HC-307.1-R1 Revision 1
- Pension procedures contained in CHAPTER II PT GKG and PT GKS Company Regulations for the period 2021 - 2023
- Procedures for Termination of Employment as contained in CHAPTER VIII PT GKG and PT GKS Company Regulations for the period 2021 - 2023.

Routine socialization regarding procedures and Company Regulations is given to workers, for example during morning assembly. 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
  - KNDM: The employee with the initials RT sends an application letter on October 18<sup>th</sup>, 2022, and attaches a personal identity document (copy of e-KTP, family card, 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 Decree on the appointment of permanent daily workers number 0032/SK-PTH/GKG-KNDM/XI/2022 which explains that workers with the initials RT are accepted as electric workers on November 1<sup>st</sup>, 2022.
  - SJYE: The employee with the initials EYK sent his application letter on October 18<sup>th</sup>, 2022, and attached a personal identification document (copy of e-KTP, family card, 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. Then, the certification unit shows the decree on appointment of permanent daily workers number 001/SK-PTH/GKS-SJYE/II/2022 which explains that workers with the initials EYK are accepted as harvesters on July 24<sup>th</sup>, 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.

- Proposal document for submitting promotions for employees in the Kendawangan region in 2022 with number 004/REG-KDW/MKNR/RH/III/2022 on February 12<sup>th</sup>, 2022, which explains that employee promotions are carried out through the selection stage and the Agronomy Promotion Juvenile Expert Training (PAJP) first. As a form of output from the training, workers will be promoted based on the results of a performance evaluation where the evaluation criteria are achievement and competence.

Then, the company showed Memo number 030/MEMO-BGA/HC/04/2022 concerning confirmation of the results of the non-staff promotion – Kendawangan region on April 18<sup>th</sup>, 2022. Out of a total of 193 workers who were proposed for promotion in 2022, a total of 169 workers were obtained who could be promoted. For example, a worker with the initials LF (admin warehouse estate) in the BSRE unit received a score of 91 from the performance evaluation results so that the worker was promoted from the PTH class to PTB P1.

- Workers' retirement documents with the initials SNRD listed in the Collective Agreement number 061/BGA-HR/REG.KDW/PB/X/2022 dated October 13<sup>th</sup>, 2022. The agreement explains that workers have entered retirement age so that from October 14<sup>th</sup>, 2022, is no longer registered as an employee at PT GKG. 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 show results identification risks at KNDM, MUTE, KNDE, STHE, BRSE, SJYE, Kopbun Rimba Sari and MSJE. For example, there is a Hazard Identification and Risk Assessment document at PT. GKG and PT. GKS was compiled on August 04<sup>th</sup>, 2022. In this document all potential hazards have been identified in all units, identification of existing obstacles, initial risk analysis, risk control plan and subsequent risk analysis by the OHS Committee Secretary who already has a General OHS Expert certificate. The document describes hazard identification at each station or activity, such as transportation, *security, weight bridge*, FFB grading, *loading ramp, transfer carriage, sterilizer, hoisting crane, thresher, press*, clarification, *boiler, kernel, engine room, water treatment, effluent, workshops*, warehouses, archives warehouses, Toxic and Hazardous materials and Toxic and Hazardous materials waste warehouses, diesel tanks, laboratories, offices, *CPO dispatch*, installation of machine units, vehicle traffic within the factory and others.

In addition, the certification unit has identified risks and potential hazards at MUTE, KNDE, STHE, BRSE (included Rimba Sari Cooperative), SJYE and MSJE, including those related to the transportation of FFB, the transportation of workers, the transportation of fertilizers, the transportation of workers, vehicle maintenance, heavy equipment operations, storage of goods in warehouses, fertilizing, transportation, spraying chemicals, harvesting, transporting FFB, land clearing, etc.

For example, observations of harvesting, loading FFB and application of EFB at the Kopbun Rimba Sari show that employees understand potential work hazards including proper work practices and using PPE in accordance with identification of work hazards and risks.

The identification results are in the form of sources/events, impacts, existing controls, risk analysis, risk control, residual risk and person in charge. Hazard Identification and Risk Assessment at KNDM has covered all operational activities in the field. The CH has conducted socialization regarding this company policy to employees and stakeholders including on December 5<sup>th</sup>, 2022, at SJYE which was attended by 18 people. This socialization includes explaining the rights and obligations of employees, OHS, potential occupational hazards, and the importance of using PPE.

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 CH monitors the effectiveness of the implementation of the OHS plan which is carried out to manage OHS risks to employees, including by conducting evaluation OHS program implementation, HIRAC evaluation at least a year once, OHS inspection, inventory facilities and infrastructure responsive emergency check \_ pregnancy every month, installation OHS infrastructure, investigation accident work, repair and maintenance programs on farms and mills, inspections obedience the use of PPE every months, monitoring degrees health employee through inspection health special and periodic health checks, giving multivitamins to harvester. As example there is administration of multivitamins period April to October 2022 at PT. GKG and GKS. Besides it's a unit of certification routine make report OHS quarter including reported OHS Committee report to the Department of Manpower and Transmigration

every 3 months, the unit of certification is also routine conduct an OHS Committee meeting every 1 month very For evaluate plans and realization of work programs in plantations and factories.

Based on the description above, it shows that the company has monitored the effectiveness of the OHS plan to deal with OHS risks to its employees.

**Status: Comply**

**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 2022 Training Calendar, among others:

- Refreshing work techniques for foremen, administration, and mechanics.
- Training on work techniques, HCV, first aid, fire extinguisher, OHS, emergency response, firefighting for plantation workers.
- Training on operator work techniques, equipment maintenance, OHS, PPE, first aid, handling chemicals, solid waste management for factory workers.
- Training and socialization of RSPO, ISPO, firefighters, fire extinguisher, first aid, HCV and waste management 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:

- Work technique training for spray and fertilizer foremen conducted in the 2<sup>nd</sup> and 3<sup>rd</sup> quarters.
- Training on harvest work techniques which was held on December 19<sup>th</sup>, 2022, and was attended by 18 harvest workers in the KNDE unit.
- OHS socialization, which was held on August 27<sup>th</sup>, 2022, and was attended by 17 spray workers in the BSRE unit.
- Fertilizer work technique training which was held on December 17<sup>th</sup>, 2022, and was attended by 15 fertilizer workers in the MUTE unit.
- Pesticide socialization, which was held on September 14<sup>th</sup>, 2022 and was attended by 8 plasma farmers.
- Building and land fire training which was held on September 13<sup>th</sup>, 2022 and was attended by 52 students at *SMKN 1 Kendawangan*.
- HCV outreach which was held on January 15<sup>th</sup>, 2022, and was attended by 6 representatives of the village community around the company.

Based on the results of interviews with workers, contractors and village community representatives (Mekar Utama 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 O19 stated that all harvest workers had received training on how to harvest.

At the KNDM Engine Room station there are 3 working shifts. The company already has 1 turbine and generator engine operator who has attended OHS operator training for production power aircraft. The company has the opportunity to continue and realize the OHS aircraft operator training program and production personnel. **OFI**

**3.7.3**

The unit of certification shows that they have properly documented every training and socialization activity that has been carried out to all workers, contractors, and related stakeholders. SCCS training was conducted on January 21<sup>st</sup>, 2023, for weighbridge operators, security, grading operators, laboratories and admin. Based on interviews with all workers involved in supply chain operations, such as security (for verification of FFB receipts), weighbridge operators, and PICs related to the supply chain, have understood the supply chain mechanism, and MB records have carried out and monitored quite well.

**Status: Comply**

**3.8**

**Supply Chain Requirements for Mills**

**3.8.1; 3.8.2**

Kendawangan 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 Kendawangan 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 production in last 12 months (MT)	Estimation for the next 12 months
FFB Processed (Estate)	230,000	229,634.34	258,700
CPO Production	52,900	53,250.70	59,500
Palm Kernel (PK) Production	10,350	11,151.39	11,600

Based on data above, the actual certified of CSPO are above the projections, and it became NC on Indicator 3.8.7 and as corrections the unit of certification has been request of additional volume and the projections became:

	Projected Certified Volume (MT)
FFB Processed (Estate)	282,986
CPO Production	65,155
Palm Kernel (PK) Production	12,925

**3.8.4**

The Mill have been registered in RSPO Palm Trace as Gunajaya Karya Gemilang with License ID CB133903, and Member ID RSPO\_PO1000003491

Whole transaction of CSPO/CSPK has been declared in RSPO IT Platform. Related to CSPK transaction, auditee informs that there's CSPK sold as physical as amount as 1,453.02 MT and there's CSPO sold as credit as amount as 34,000 MT.

The auditors verify related to transactions on the Palmtrace platform with actual sales of certified products, for example of transaction record on 12 April 2022, where there was a sale of CSPK with amount 598.14 ton to PT Andes Agro Investama Sei Kerandi Kernel Crushing Plant and this was in accordance with the transactions made at RSPO Palmtrace.

**3.8.5**

Kendawangan Mill had procedure for SCCS with MB or IP model in document No. BGA-SUST-SOP-44 dated 16 December 2020. The procedure has covered all elements of supply chain model requirements such as:

- Records and reports of compliance with supply chain requirements including training records.
- Appointment of person in charge (PIC) for SCCS application and role of implementation.
- 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 No. BGA-SUST-SOP-50 dated 12 May 2018. The procedure aims to enforce criteria, methods, responsibility for implementation internal audit of RSPO, ISPO, ISCC, ISO 9001, ISO 14001, SMK3 (OHSAS 18001) for ensure the effectiveness of its application. Internal audit conduct annually by Certification and Compliance Department, with approval by Management Representative. Internal audit and corrective action report will become one of management review agenda.

Internal audit was held on 17 – 21 January 2023 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 the SOP for Product Identification & Traceability (Doc.No.: BGA-SUST-SOP-44), it is known that the factory ensures the availability of FFB sources that are supplied to factories that are RSPO certified and those that are not RSPO certified.
- Based on the results of field observations at Sungai Tapah Estate and Kendawangan Estate, there are blocks that are outside the scope of certification, such as Block M24a (KNDE) and Block I19b (STHE).
- Based on a review of FFB receipts for the period February 2022 to January 2023, all FFB originating from Sungai Tapah Estate and Kendawangan Estate is RSPO Certified FFB.
- Based on the verification of the Fruit Delivery Letter (SPB) document dated 14 December 2022, it is known that FFB originating from non-certificates (Block I19a and Block I18b) was sent to Kendawangan Mill.
- Based on verification of mass balance records, CPO, and PK production during the period February 2022 to January 2023 has exceeded the certified volume, as follows:

	Last Year Projected Certified Volume (MT)	Actual production in last 12 months (MT)
CPO Production	52,900	53,250.70
Palm Kernel (PK) Production	10,350	11,151.39

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 and notification to CBs regarding excess certified production. **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 CSPK on 12 April 2022 with information:

- Quantity : 6,790 kg
- Seal Number : 210827270/210827271
- Time : 09:41 WIB
- Weighbridge Card : 81822122691
- Driver : Eto
- No. Police : G 1410 JE
- FFA : < 4,00
- DO No. : 008/GKGL/PK/III/2022

Based on document review and interview with management representative, the company sold 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:

- PT Suri Adidaya Kapuas (PK transporter), agreement No. 002/SPKS/KNDM/IV/2022 dated April 2022 valid thru April 2023.
- CV Kawira Putra (CPO transporter), agreement No. 001/SPKS/KNDM/IV/2022 dated April 2022 valid thru April 2023.

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 PT Suri Adidaya Kapuas, where he stated that he was ready to be audited by a third party regarding the RSPO. From these data it is also known that there has been no change/addition of contractors who manage certified products from the previous assessment.

**3.8.12**

Kendawangan Mill has record of all CSPO and CSPK information, as well as presented in the table bellows:

**Crude Palm Oil**

Period	CPO production (MT)		Total	CSPO Dispatch (MT)			Total
	Cert	Non-Cert		Physical	Credit	Non-Cert	
Feb 2022 to Jan 2023	53,250.70	40,589.74	93,840.44	-	51,000.00		51,000.00

Based on record verification, there's no CSPO sold as certified product physically.

**Palm Kernel**

Period	PK production (MT)		Total	CSPK Dispatch (MT)			Total
	Cert	Non-Cert		Physical	Credit	Non-Cert	
Feb 2022 to Jan 2023	11,151.39	8,471.10	19,622.49	2,972.88	-	7,989.77	10,962.65

Based on record verification, there's CSPK sold as certified product on license period as amount as 2,972.88 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 March 2022 is 23.4 % based on the amount of CPO (8,906 tons) divided by the total processed FFB (37,924 tons). The implementation based on company procedures (SOP Storage Tank and Bulk Silo BGA-SOP-OP-1002.9-R0, 1 January 2014). The sounding process for quantity product calculation done by head of administration (KTU) every morning.

**3.8.16**

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

- Member Name: Gunajaya Karya Gemilang
- Membership No.: 1-0043-07-000-00 (Bumitama Agri Ltd)
- Member ID: RSPO\_PO1000003491
- License ID: CB133903

Whole transaction of CSPO/CSPK for Period June 2022 to January 2023 has been declared in RSPO IT Platform. Based on auditor verifications there are 51,000 MT CSPO and 7,989 MT CSPK sold as conventional. For the products, that sold as conventional the unit of certifications can presented removing or allocated in the RSPO Palm Trace, ie:

Stock Transaction ID	Date	Product	Supply Chain Model	Transaction Type	Volume
ST-TR-784c77f6-9634	18-07-2022	CSPO	Mass Balance	Credit Allocation	12,000
ST-TR-ca285f3f-3210	23-05-2023	CSPO	Mass Balance	Credit Allocation	12,000
ST-TR-d20665e3-8d1f	20-09-2022	CSPO	Mass Balance	Credit Allocation	22,000

*\*Volume in MT*

From shipping announcement verification, known that shipping announcement carried out not more than 3 months after dispatch. For example, on 24 March 2022 to 12 April 2022, where there was a sale of 598.14 ton (77 times transport) of CSPK with details of recordings of weighing cards on that date to PT Andes Agro Investama and this was in accordance with the transactions made at RSPO Palmtrace. Where, the shipping announcement was made on 17 May 2022 and confirmed by the recipient on 18 May 2022.

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 Labor and Human Rights Policy document which has been in force since January 2022 and has been signed by the Kendawangan Regional Head.

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 5<sup>th</sup>, 2022, which was attended by 31 participants. 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 *LKS Bipartite* representatives, gender committees, local contractors and representatives of the Seriam 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 Employment and Human Rights Policy. In point 5 it is explained that the certification unit is committed not to carry out acts of extrajudicial intimidation or violence in any form against human rights defenders, including the use of military/security forces.

Based on the results of interviews with representatives of *LKS Bipartite* 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 No. Unit BGA-SUST-SOP-08 Revision 2 which was approved by the Kendawangan Regional Head. The procedure explains that the steps for submitting complaints can be conveyed in writing and orally through staff appointed as communicators. The maximum response time for complaints is 15 days after the information is received. The document also explains that if a complaint arises in the RSPO complaint process, the unit of certification through the relevant department will handle the complaint in accordance with the RSPO process. Then, the certification unit has recapitulated all complaints and conflicts submitted by all affected parties around the unit of certification in the Complaints and Responses Recording Book/Logbook. Based on the results of the document review, it is known that during 2022 there were no conflicts reported to PT GKG or PT GKS.

The results of interviews with daycare workers in each plantation unit, workshop staff at the factory unit, local contractors, representatives of the Banjar Sari Village community and government agencies in Ketapang District, it is known that they understand how to communicate and consult with companies because procedures related to complaints and conflicts have been submitted periodically to all parties. For example, the socialization which was held on July 18<sup>th</sup>, 2022. Then, based on the results of field visits in the company's operational areas, there are whistle blowing sign boards that have been installed in public places such as in employee housing locations, in front of estate offices, and other strategic locations. With the existence of the sign board, it is expected that all parties can easily inform complaints/conflicts to the appointed communicator in the event of irregularities or violations that occur within the certification unit.

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 No. Unit BGA-SUST-SOP-08 Revision 2 which was approved by the Kendawangan Regional Head. In point 7.1.3 letter "g", it is explained that if it is not possible to submit/request information or complaints by stakeholders in writing due to various reasons (writing skills/disabilities), then submission/requests for information or complaints can be made verbally through Public Relations staff /CSR. The certification unit also has a *LKS Bipartite* 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 (Kendawangan Kiri Village, Banjarsari Village, Mekar Utama Village and Seriam Village), 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 Complaints Recording Book/Logbook and their Responses, it was found that there were complaints from workers, internal or external stakeholders, for example as follows:

- Complaint from an employee with the initials SH (harvesters in division 2 of the MUTE unit) filed a complaint regarding the repair of a leaky roof on May 20<sup>th</sup>, 2022. Then the certification unit responded to the complaint which was stated in the employee housing repair report document on the same date, i.e. May 20<sup>th</sup>, 2022. The unit of certification also shows proof of documentation of the replacement of the roof in the worker's house.
- Incoming letter from the Ketapang Sector of *POLRES* Kendawangan number B/265/XI/YAN.2.14/2022 November 7<sup>th</sup>, 2022, submitting a request for material assistance in the process of building an evidence warehouse in the police room and renovating the parking lot. Furthermore, the unit of certification showed a response letter with the number 074/11/CSR/2022 on November 8<sup>th</sup>, 2022, regarding confirmation of the material assistance needed to be followed up on its realization within 14 working days. Then, all files related to the request until the final settlement have been properly documented.

Based on the results of interviews with workers in the plantation and factory units, local contractors, representatives of the Mekar Utama Village community and government agencies in Ketapang 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 Complaint SOP number BGA-SUST-SOP-40 which was ratified on May 12<sup>th</sup>, 2018, by the Head of Kendawangan Regional, it is explained that the unit of certification is committed to actively giving freedom to the reporting party to obtain legal and technical assistance from an independent party.

Based on the results of the document review, it is known that during the last one there were no conflicts reported to PT GKG and PT GKS. The results of interviews with all parties such as workers, local contractors, representatives of the Kendawangan Kiri Village community, state that the conflict resolution mechanism can use options to obtain legal and technical assistance from independent parties, where the reporting party has the freedom to choose the 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.**

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, for example the meeting contained in *Berita Acara Penyusunan RKP Desa Melalui Musyawarah Desa* in Banjar Sari Village on 18 July 2022 which was attended by community leaders and also women's representatives. Many program activities have been realized by the company in the 2021/2022 period, for example:

- Participation in repairing generator engines in Klukub Blantak Hamlet.
- Renovation of Pentecostal Church of Dusun Sukaria.
- Repair of Mekar Utama village provincial road.
- Procurement of fishing nets in Mekar Utama Village.
- Bridge repair in Kendawangan Kiri Village.
- Development of Maju Harmonious Vegetable and Corn Farmers Group in Mekar Utama Village.
- Development of Integrated livestock development in Kendawangan Kiri Village.
- Development of horticultural crops by the agricultural group of Banjar Sari Village.

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.

**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 Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa. The land rights owned by the company are in the form of HGU and also HGB, the following is an explanation for each entity:

##### **PT Gunajaya Karya Gemilang**

The company shows documents related to land rights owned by the company, including the latest land rights that have been issued by the relevant agency, along with the details:

- Decree of BPN RI No. 67/HGU/BPN/RI/2011 for PT GKG area of 7,261.89 Ha which was issued on 18 July 2013, which consists of Certificate No. 69, 70, 71, 72, 73, and 74 issued on October 3, 2013, and valid until October 1, 2048, for an area of 7,261.89 Ha
- Decree of BPN West Kalimantan Province No 04/HGU/BPN.61/2016 for the PT GKG area of 177.90 Ha issued on 21 July 2016, which consists of Certificate no. 135 and 136 which were issued on 19 September 2016 and are valid until 21 July 2051, for an area of 177.90 Ha.
- 59 HGB certificates issued on 14 February 2019 and valid until 8 January 2049, for an area of 120 Ha.

Based on the review of these documents, the company has land rights covering an area of **7,559.79 ha**.

The land right is also accompanied by a business permit contained in the Decree of the Ketapang Regent No.542/DISBUN-D/2013 dated October 31, 2013, the area permitted for plantation business is 9,471 Ha with a processing unit capacity of 60 Tons of FFB/Hour, located in Kendawangan District, Ketapang Regency, West Kalimantan Province.

##### **PT Gunajaya Ketapang Sentosa**

The company shows a Decree from the National Land Agency of the Republic of Indonesia Number: 85/HGU/BPN/RI/2011 issued on December 21, 2011, concerning the Granting of Cultivation Rights to PT Gunajaya Ketapang Sentosa with an area of **7,665.81 Ha** which is valid for 35 years (valid until December 21, 2047). The HGU Decree consists of 2 certificates, including:

- HGU Certificate No. 01, dated June 27, 2012, based on Measurement Letter dated August 5 2010 area 5,393.54 Ha
- HGU Certificate No. 02, dated June 27, 2012, based on Measurement Letter dated August 5, 2010, area 2,272.27 Ha

In addition, there's areas with HGB of PT GKS is totalling for about **13.57 ha** which consist of 3 certificates, i.e.: Certificated No. 41 dated 11 March 2019, No. 42 dated 11 March 2021 and No. 46 dated 31 March 2020, for area covers 19,020 m<sup>2</sup>; 16,760 m<sup>2</sup> and 99,900 m<sup>2</sup>, respectively. HGB is valid for 30 years since the date of issuance, or between 2049 to 2050.

In this audit activity, the company is expanding the scope, where the additional entity is the Rimba Sari Cooperative. The Rimba Sari Cooperative itself is a cooperative that is fully managed by the company. The land rights owned by the cooperative are in the form of SHM documents for 395 members with an area of **583.97 ha**. As an example of SHM shown are:

- No. SHM 01380 (0.53 ha)
- No. SHM 01381 (1.54 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 2007 to 2015. As of 2020, land acquisition has been carried out covering an area of 10,673.985 Ha. The company shows the recapitulation of the names of land owners who have been released for KNDE and MUTE. The company also showed PT GKG's Minutes of Land Inspection Committee No. 16/HGU-HTPT/BPN/2010 for a land area of 7,861.21 Ha.

Land compensation documents along with the negotiations have been well documented and stored in the Ketapang 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. One of the most recent evidence of land compensation is in the 2015 record of compensation contained in the document Minutes of Compensation Payment / Land Acquisition (No.: Satgas-GKS/January/2015) made on 22 January 2015 between the company and the previous land owner on behalf of Hajeri from Seriam Village with width of land 21,22 ha. The recording contains information related to land acquisition costs, a statement letter, land handover letter, agreement letter for release of land tenure rights, location map, proof of payment signed by both parties and known to the Head of Seriam Village, Kendawangan Police, Kendawangan Sub-District Head and Kendawangan Koramil. this is in accordance with the results of interviews with Head of Seriam Village.

**4.4.3**

The CH has had SOP related land identification and compensation on SOP Procedure – Indemnity of Planting And Area (No. BGA-SOP-GL-903.1-R0, dated 01 June 2013) which set land identification, calculation and compensation for land acquisition mechanism. In this procedure was explained that the process of land identification is involved the community and the village government.

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, has include the maps, price agreement, evidence of payment, and signed by both party as well as Village Officials. The latest land compensation has been conducted before 2015. The location of the scope is in accordance with the company's operational map with a scale of 1: 50,000.

Based on management interviews, it is known that the CH has no plans to expand the land by legal compensation for community. Currently the company is still in the process of obtaining legality for the fostered cooperatives which are managed directly by the company.

**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 on 2015. 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.

	<b>Status: Comply</b>	
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**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. Based on documents review, interview and field visits, it is known that CH did not expand the operational area and there is no more land clearing activity since the last assessment. The land clearing process has been verified by NPP on 16 December 2014. This was evidenced by the results of public consultations with the community and the absence of additional *GRTT* records before 2015. 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.

Based on the results of interviews with representatives of surrounding Villages (Kendawangan Kiri, Seriam, Banjarsari and Mekar Utama 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 Land Acquisition and Compensation, document No. BGA-SOP-GL-903.1-R0. 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 2015. The company has procedure of Land Acquisition and Compensation, document No. BGA-SOP-GL-903.1-R0. 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.

The company has collaborated with local communities in developing community estates, including:

**Collaboration with the Seriam Mandiri Agro Plantation Cooperative**

1. Cooperation Agreement between PT Agro Sejahtera Manunggal and the Agro Seriam Mandiri Plantation Cooperative (Approval of the Cooperatives Agency of Ketapang District No. 255/BH/KOP.UKM & PERINDAG/II/2009 in Seriam Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province No. 01/SPK-ASM/VIII/2010) regarding Development and Management of 1,000 Ha Partnership Oil Palm Plantations. The cooperation period is approximately 25 years since the signing of the agreement (27 August 2010).
2. Addendum I to the Cooperation Agreement for the Development and Management of Partnership Oil Palm Plantations with an area of ± 1,321 Ha No. 01 ADD1/SPK-ASM/VIII/2010 between the Agro Seriam Mandiri Plantation Cooperative and PT Agro Sejahtera Manunggal on 16 December 2015. The essence of the change is to add to the sale of land release from ± 1,000 Ha to ± 1,321 Ha with a period of 30 years. With a total of 660 farmers.

**Collaboration with Sawit Maju Sejahtera, Palm Oil Farmers Group**

Letter of Agreement for Cooperation in the Management of Oil Palm Plantations on 6 February 2009 between the Sawit Maju Sejahtera Farmers Group and PT ASM. The essence of this cooperation agreement letter is:

1. The first party is the Sawit Maju Sejahtera Farmers Group which consists of individual owners of oil palm plantations located in the Kendawangan sub-district and the second party is PT Agro Sejahtera Mandiri
2. The parties have agreed to cooperate in the management of oil palm plantations belonging to members of the first party including buying and selling FFB and the first party stated that it would comply with the conditions required by the second party and guarantee that all FFB sold to the second party came from the plantation owned by the second party. and not from something that violates the law.
3. The first party hands over the management of the oil palm plantation belonging to members of the farmer group covering an area of ± 1,335.23 Ha to be managed by the second party, the total area can be increased according to the development of the area of the plantation owned by the members of the first party, including selling all of the FFB produced by the plantation and the second party accepts management hand over the plantation includes buying FFB produced by the plantation belonging to the first party members according to the price set by the Governor of West Kalimantan Province
4. For the benefit of the parties, the second party will periodically provide information on the use of plantation management funds including the proceeds from the sale of FFB to the first party, and if there is an excess in the value of FFB after deducting the management costs (surplus), the second party will hand over the surplus. through the first party

5. The validity period of this cooperation is 25 years

The agreement was known by both parties and based on certificate recapitulation data, there were 525 farmers who were members of the Maju Sejahtera Palm Oil Farmers Group.

Based on the document review, it is known that the development of partnership estate began in 2009 and was completed in 2012 with a total area of 2,387.89 Ha or 38.98% of the total HGU owned. The details are the Agro Seriam Mandiri Plantation Cooperative covering an area of 1,366.27 Ha and the Sawit Maju Sejahtera Palm Oil Farmers Group covering an area of 1,021.62 Ha. The company has also reported the realization of the development of community plantations/plasma plantations in PT ASM's Activity Implementation Progress Report. The Report on the Progress of Implementation of PT ASM Activities for the First Quarter of 2022 was reported to the Ketapang Plantation Agency on March 15, 2022.

Based on interviews with the Agro Seriam Mandiri Cooperative, information was obtained that the company already has an agreement to facilitate the development of the surrounding community estates. The implementation of the development of the surrounding community estates was in accordance with the agreement of both parties.

**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 2015. 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. One of the most recent evidence of land compensation is in the 2015 record of compensation contained in the document Minutes of Compensation Payment / Land Acquisition (No.: Satgas-GKS/January/2015) made on 22 January 2015 between the company and the previous land owner on behalf of Hajeri from Seriam Village with width of land 21,22 ha. The recording contains information related to land acquisition costs, a statement letter, land handover letter, agreement letter for release of land tenure rights, location map, proof of payment signed by both parties and known to the Head of Seriam Village, Kendawangan Police, Kendawangan Sub-District Head and Kendawangan Koramil

Based on the results of interviews with representatives of surrounding Villages (Kendawangan Kiri, Seriam, Banjarsari and Mekar Utama Village), there are no issues of dispute or other land issues with the company. Results of interviews with village representatives also included the previous land owner.

**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 2015. There is FPIC Procedure on Document No. BGA-SOP-GKG-01-R0 dated 10 September 2014 and Internal Office Memo of Deputy regional Head No. 003/ASM-SUST/03/2017 dated 01 July 2017, part 2.4 explains that identification of participatory maps related to legal ownership of the community considers gender, community leaders, local or transmigrant communities, ethnic groups, etc. This procedure also explains that the FPIC process is based on joint decisions of various affected parties, without prejudice to any party.

**4.7.3**

Based on the results of interviews with representatives of surrounding villages (Kendawangan Kiri, Seriam, Banjarsari and Mekar Utama 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 procedure No. BGA-SOP-GKG-01-R0 dated 10 September 2014 and Internal Office Memo of Deputy regional Head No. 003/ASM-SUST/03/2017 dated 01 July 2017. The procedures include explaining the conflict information, conflict analysis, coordination of conflict handling, and preparation of reports on handling progress carried out periodically.

Based on field observation, document review and public consultation with relevant stakeholder (National Land Agency, Kendawangan Kiri, Seriam, Banjarsari and Mekar Utama Village), there's no issue related to land conflict.

Based on the results of the study of the area statement documents, there are several areas occupied by other parties, 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 L07 (Sungai Tapah Estate) and Block S20/19 (Seriam Jaya Estate) and 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. From the results of interviews with representatives of Kendawangan Kiri Village, it was also explained that there were indeed areas that had not been compensated by the company.

**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, the pricing is an agreement between the management of supplier and the FFB supplier. Pricing is fluctuated in accordance with the development of FFB prices and CPO prices on the world market.

Based on the results of interviews with the FFB supplier, it is known that the company always communicates to him every day regarding changes in FFB prices. The company also informs the FFB on the notice board at the factory and communication via call, short message service and application like *whatsapp*, so that it can be seen by FFB suppliers.

The company shows evidence of FFB purchases from independent smallholders, for example on behalf of *Koperasi Fajar Mandiri and Koperasi Bina Sari* for the period of January 2023. 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 Kalimantan Barat 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 Kalimantan Barat Province for the period I January 2023 on 13 January 2023.

**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**

Kendawangan POM is part of the PT Gunajaya Karya Gemilang entity which has a business license in 2013. In the context of the obligation to build plasma, the company already has Cooperation documents, with the following details:

- Cooperation Agreement Letter Number: 01/KSU-B/VIII/2008 dated August 25, 2008 between the Joint Multi-Business Cooperative (KSU) domiciled in Mekar Utama Village, Kendawangan District, Ketapang Regency, West Kalimantan Province regarding Development and Management of Partnership Pattern Oil Palm Plantations.
- Letter of Cooperation Agreement Number: 01/KSU-KB/VIII/2008 dated 25 August 2008 between the Karya Bersama Multi-Business Cooperative (KSU) domiciled in Kendawangan Kiri Village, Kendawangan District, Ketapang Regency, West Kalimantan Province regarding Development and Management of Partnership Pattern Oil Palm Plantations.
- Letter of Cooperation Agreement Number: 01/K-BS/VIII/2008 dated 25 August 2008 between the Bina Sari Cooperative domiciled in Banjarsari Village, Kendawangan District, Ketapang Regency, West Kalimantan Province) and PT GKG regarding Development and Management of Partnership Pattern Oil Palm Plantations.
- Letter of agreement dated 6 February 2012 between the Joint Oil Palm Farmers Group and PT GKG regarding the Development and Management of Partnership Pattern Oil Palm Plantations.



- Letter of Cooperation Agreement Number: 06/SPK-KOP.BUN/VFM/X/2010 dated 27 October 2010 between the management of PT GKS and the Fajar Mandiri Cooperative (Seriam Village, Kendawangan District, Ketapang Regency, West Kalimantan Province) regarding Development and Management of Oil Palm Plantations Partnership.
- The company has a partnership agreement with the Fajar Mandiri Plantation Cooperative and PT GKS dated 27/10/2010 which has been signed by both parties and the local government (Disperindag, cooperatives, Plantation Service and the District Head of Ketapang) with the area.
- The company has a partnership agreement with Koperasi Sawit Makmur with PT GKS No. 01/SKK SM-GKS/IV/2015 dated 5 April 2015 which was signed by both parties and the local government (Disperindag, cooperatives, Plantation Service and District Head of Ketapang).
- The company has a partnership agreement with the Rimba Sari Cooperative with PT GKS dated 15 May 2017 SPK No. 01/PKS-GKS/V/2017 which has been signed by both parties and the local government (Disperindag, cooperatives, the Plantation Service and the District Head of Ketapang).

Based on the results of public consultation with the Fajar Mandiri Cooperative farmers, the construction of the plasma has been completed and has received profit sharing in 2013. In addition, there is also evidence that women's representative parties are also members of the cooperative, for example farmer members on behalf of Misna (female gender) as members of the Rimba Sari Cooperative.

The company has made efforts to socialize independent suppliers to be involved in RSPO certification, for example the recording of the socialization in 2022 to CV Mitra Djaya Abadi.

**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 I January 2023. where the calculation of payment is in accordance with agreement. Furthermore, based on the statement of the smallholder members (KUD Fajar Mandiri), the company can demonstrate that the payment is in accordance with the agreed 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 2 weighing equipment at Kendawangan Mill, along with calibration records:

- The certification unit has also shown documents on the weighbridge calibration (Serial Number 123650394) carried out in 25 January 2022 and valid until 25 January 2023 by Legal Industrial and Commerce Department Ketapang Regency (No.: 010/SKHP/MET-THE//2022).
- The certification unit has also shown documents on the weighbridge calibration (Serial Number 123650392) carried out in 25 January 2022 and valid until 25 January 2023 by Legal Industrial and Commerce Department Ketapang Regency (No.: 011/SKHP/MET-THE//2022).

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 form of an External Complaint Resolution SOP with Number BGA-SOP-GKG-0315-27-RO which was passed on April 10, 2015. The company also has other SOPs related to complaint handling, namely Communication SOP with BGA-SOP Number GKG-2415-28-RO which was passed on 28 April 2015. Based on the minutes conducted on February 4, 2020, informing that the company has installed and updated the complaint channel notification board (whistle blowing) in the Kendawangan Mill area.

Based on document review of complaint book, there is no complaint from contractor or vendors.

**Status: Comply**

**5.2**

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

**5.2.1 & 5.2.5**

Kendawangan POM is part of the PT Gunajaya Karya Gemilang entity which has a business license in 2013. In the context of the obligation to build plasma, the company already has Cooperation documents, with the following details:

- Cooperation Agreement Letter Number: 01/KSU-B/VIII/2008 dated August 25, 2008, between the Bersama Multi-Business Cooperative (KSU) domiciled in Mekar Utama Village, Kendawangan District, Ketapang Regency, West Kalimantan Province regarding Development and Management of Partnership Pattern Oil Palm Plantations.
- Letter of Cooperation Agreement Number: 01/KSU-KB/VIII/2008 dated 25 August 2008 between the Karya Bersama Multi-Business Cooperative (KSU) domiciled in Kendawangan Kiri Village, Kendawangan District, Ketapang Regency, West Kalimantan Province regarding Development and Management of Partnership Pattern Oil Palm Plantations.
- Letter of Cooperation Agreement Number: 01/K-BS/VIII/2008 dated 25 August 2008 between the Bina Sari Cooperative domiciled in Banjarsari Village, Kendawangan District, Ketapang Regency, West Kalimantan Province) and PT GKG regarding Development and Management of Partnership Pattern Oil Palm Plantations.
- Letter of agreement dated 6 February 2012 between the Joint Oil Palm Farmers Group and PT GKG regarding the Development and Management of Partnership Pattern Oil Palm Plantations.
- Letter of Cooperation Agreement Number: 06/SPK-KOP.BUN/VFM/X/2010 dated 27 October 2010 between the management of PT GKS and the Fajar Mandiri Cooperative (Seriam Village, Kendawangan District, Ketapang Regency, West Kalimantan Province) regarding Development and Management of Oil Palm Plantations Partnership.
- The company has a partnership agreement with the Fajar Mandiri Plantation Cooperative and PT GKS dated 27/10/2010 which has been signed by both parties and the local government (Disperindag, cooperatives, Plantation Service and the District Head of Ketapang) with the area.
- The company has a partnership agreement with Koperasi Sawit Makmur with PT GKS No. 01/SKK SM-GKS/IV/2015 dated 5 April 2015 which was signed by both parties and the local government (Disperindag, cooperatives, Plantation Service and District Head of Ketapang).
- The company has a partnership agreement with the Rimba Sari Cooperative with PT GKS dated 15 May 2017 SPK No. 01/PKS-GKS/V/2017 which has been signed by both parties and the local government (Disperindag, cooperatives, the Plantation Service and the District Head of Ketapang).

Based on the results of public consultation with the Fajar Mandiri Cooperative farmers, the construction of the plasma has been completed and has received profit sharing in 2013.

During this audit, the company has proposed an extension scope for the Fajar Mandiri Cooperative and the Rimba Sari Cooperative as units to be RSPO certified. For other cooperatives that are assisted by the company, they are still in the process of completing legality.

The company has also reviewed and published the progress of supporting plasma as well as sustainability aspects in the 2022 Sustainability Report which can be accessed on the website. <https://bumitama-agri.com/>

**5.2.4**

The company also carries out maintenance activities using pesticides in the form of herbicides as a form of support for the management of plasma farmers in these locations (Fajar Mandiri, Bina Sari and Rimba Sari Cooperative, as described in indicator 5.1.4), this can be seen from the review of documents recording activities for spraying systemic herbicides in the period January 2023.

**5.2.2 & 5.2.3**

In improving the welfare of the community, the company has provided participation in addition to the annual CSR program, the company has also established partnerships in carrying out tasks assigned to local third parties, for example on Agreement Record No. 001/SPKS/KNDM/IV/2022 – CPO Transporter on April 4, 2022, with CV Kawira Putra from Kendawangan Kiri village. In addition, the company is currently applying for its Rimba Sari cooperative within the scope of RSPO certification. For other fostered cooperatives, it is currently still in the process of finalizing the legality for each farmer.

**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 Labor and Human Rights Policy document which has been in effect since January 2022 and has been signed by the Head of Kendawangan Regional. It is stated that the unit of certification is committed to implementing several principles, one of which is to provide equal employment opportunities regardless of race, religion, degree, ethnicity, gender, skin colour, imperfection (disability), sexual orientation, political affiliation, membership organization and age. This policy has been socialized in each unit to workers, for example the socialization on December 5<sup>th</sup>, 2022, which was attended by 31 participants. 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, *LKS Bipartite* 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 Labor and Human Rights Policy document which has been in effect since January 2022 and has been signed by the Head of Kendawangan Regional. The unit of certification also shows a workforce register document for the December 2022 period which contains demographic information for all workers at PT GKG and GKS, namely workers who come from various regions, religions, ages, etc. Then from the results of interviews with loose fruit harvesting and pick-up workers at the SJYE unit, it was stated that they were workers who came from outside the island of Kalimantan. During the recruitment process, the unit of certification has covered all costs for migration from East Nusa Tenggara to West Kalimantan. They also stated that the unit of certification does not practice charging workers and retaining personal identification documents during the recruitment process.

Based on the results of interviews with workers, *LKS Bipartite* and gender committee representatives, information was obtained that there were no issues related to discrimination. PT GKG and PT GKS 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, the proposal for submitting a promotion for employees in the Kendawangan region in 2022 with the number 004/REG-KDW/MKNR/RH/II/2022 on February 12<sup>th</sup>, 2022, which explains that employee promotions are carried out through the selection stage and the Agronomy Promotion Juvenile Expert Training (PAJP) first. As a form of output from the training, workers will be promoted based on the results of a performance evaluation where the evaluation criteria are achievement and competence. Then, the company showed Memo number 030/MEMO-BGA/HC/04/2022 concerning confirmation of the results of the non-staff promotion – Kendawangan region on April 18<sup>th</sup>, 2022. Out of a total of 193 workers who were proposed for promotion in 2022, a total of 169 workers were obtained who

could be promoted. For example, a worker with the initials AR (processing assistant operator) at the KNDM unit received a score of 89 from the performance evaluation results so that the worker was promoted from class *PTB P1* to *PTB P2*.

Based on the results of interviews with head of administration, 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 GKG and PT GKS, 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 plantation and factory unit for the 2022 period consisting of representatives of each gender, namely men and women. The organizational structure consists of a Protector/Advisor/Counsellor, Chairperson, Deputy Chairperson, Secretary and Members.

Gender committee work program in 2022 for all units at PT GKG and PT GKS, including regular meetings of the gender committee management, integrated healthcare centre, periodic pregnancy checks, environmental hygiene, socialization of women workers' rights, 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:

- Implementation of integrated healthcare centre and periodic pregnancy checks conducted every month at the company clinic.
- Unit STHE at PT GKG: Socialization of the work program which was carried out on January 4<sup>th</sup>, 2022, and was attended by 8 representatives of female workers in the STHE unit.
- Unit SJYE at PT GKS: The regular meeting of the management of the gender committee was held on December 28<sup>th</sup>, 2022, whose agenda discussed work program evaluation and identified work programs to be implemented in the coming period. The activity was attended by 15 gender committee officials.

Based on interviews with women workers, it is known that they know the function, work program, and mechanism for submitting complaints through the gender committee. Then, based on the results of interviews with representatives of the gender committee it is known that until now the work program of the gender committee has prioritized women workers. However, it is possible that cases of sexual harassment or violence against male workers can also be submitted through the gender committee.

#### **6.1.6**

Payment of fair wages has been properly carried out by the unit of certification, taking into account ability, performance, expertise, length of service, 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. This is stated in the Memo document number 114/MEMO-BGA/HC-POP/XII/2022 which informs about the determination of PTB and PTH employee wages for 2023 in the Kendawangan region. In the document it is known

that the wage setting for workers with PTH status is IDR 3,085,615. Then, it is also explained regarding the wage scale structure that applies to workers with PTB status starting from the lowest class P1 (IDR. 3,125,615) to the highest class U8 (IDR 3,360,615).

Based on the results of interviews with daycare workers with PTH status, it is known that the basic wages and benefits they receive are of the same value. Employees also receive an attendance premium based on performance appraisal. However, it is different from the mechanical workers in the KNDM and KNDE units with PTB status who state that the basic wage they receive is different in value because it is based on the prevailing wage scale structure.

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:

- Decree of the Governor of West Kalimantan Number 1462/DISNAKERTRANS/2021 which took effect on January 1<sup>st</sup>, 2022, concerning the 2022 Ketapang District Minimum Wage of IDR 2,876,252.
- Memo number 005/MEMO-BGA/HC-POP/1/2022 concerning Determination of Wage for PTB and PTH Employees for 2022 which was issued on January 7<sup>th</sup>, 2022. It is known that the determination of wages for workers with PTH status is IDR 2,876,252.
- Decree of the Governor of West Kalimantan Number 1380/NAKERTRAN/2022 which took effect on January 1<sup>st</sup>, 2023, concerning the 2023 Ketapang District Minimum Wage of IDR 3,085,615.
- Memo number 114/MEMO-BGA/HC-POP/XII/2022 concerning Determination of Wages for PTB and PTH Employees for 2023 issued on December 23, 2022. It is known that the determination of wages for workers with PTH status is IDR 3,085,615.

The unit of certification can show documentation of payment of wages for all workers shown in the payroll and pays lips which include components such as basic wages, premiums, overtime, benefits (BPJS, electricity subsidies, etc.), and deductions (BPJS, loans, 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 and January 2023, including:

- Harvesters with the initials AS in the MUTE unit receive a basic wage in December 2022 of IDR 2,888,000
- The daycare worker with the initials LA at the BSRE unit received a basic salary in January 2023 of IDR 2,888,000. From the employee's salary slip document, it is known that workers have not received a wage increase in 2023 due to the company's cut off starting from the 20<sup>th</sup> – 21<sup>st</sup>. So that the basic wage paid in January 2023 is the basic wage provision in the previous year. The management representative stated that the wage shortfall will be added to the following month's payroll.

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 for the harvest worker with the initials SP at the SJYE unit which was signed by both parties, namely the worker and the management representative on May 10<sup>th</sup>, 2021.
- A permanent daily work agreement letter for generator operator with the initials RBT in the STHE unit which was signed by both parties, namely the worker and the management representative on May 19<sup>th</sup>, 2022.

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 generator operator with the initials RBT receives a basic wage for December 2022 that is in accordance with the applicable UMK, namely IDR 2,876,252 plus a rice allowance of 15 kg of rice.

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 Company Regulation document for the period 2021 – 2023 which was ratified on July 27<sup>th</sup>, 2021, by the Director General of Development Industrial Relations and Labor Social Security. For example, in Article 42 regarding the types of violations and the imposition of sanctions, it is explained that workers who are absent without explanation will receive wage deductions which are calculated based on 1 month's basic wage divided by 25 working days.

Then, based on the results of a field visit to the employee housing (generator engine room) at the STHE unit, information was obtained that there was a worker with the initials ARJN who previously worked as a harvester, now being transferred as a generator operator. Before being transferred to a new job, the worker has been explained by the management representative regarding the job description, rights and obligations as a generator operator. This is in line with the results of interviews with workers that they have understood job descriptions, the wages they receive, and other matters related to working conditions.

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:
  - Boiler operators pay slip document with the initials SJ (*PHT*) who receive a basic salary overtime pay of IDR 2,888,000 and overtime pay of IDR 3,889,618 in December 2022 for a total of 120 hours of overtime and the value of one hour overtime pay is IDR 16,694. Workers have signed an overtime order agreed by both parties (worker and certification unit representative) before carrying out overtime work.
  - Electric maintenance pay slip document with the initials WES (*PHB*) who receive a basic salary overtime pay of IDR 2,986,000 and overtime pay of IDR 3,349,723 in December 2022 for a total of 103 hours of overtime and the value of one hour overtime pay is IDR 17,156. Workers have signed an overtime order agreed by both parties (worker and certification unit representative) before carrying out overtime work.
  - Security officers will get a premium in lieu of overtime if they work more than 7 hours. The premiums earned by security officers have the same or more value when compared to overtime pay. For example, security pay slip document with the initials SR (*PHT*) who receive a basic salary overtime pay of IDR 2,986,000 and premium pay of IDR 2,728,000 in December 2022. The worker has a total of 71.5 hours of overtime and the value of one hour overtime pay is IDR 16,694.
- Every worker also has the right to annual leave of 12 days in one year. The following is an example:
  - A worker with the initials KRNT who apply for 12 days of leave from the total remaining 12 days of leave entitlements. The request has been approved by the Estate Manager BSRE.
  - A worker with the initials SWNT who apply for 10 days of leave from the total remaining 10 days of leave rights. The request has been approved by the Estate Manager SJYE.
- 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. For example:
  - Menstrual leave application formula: A worker with the initials IFR apply for one day menstrual leave. The request has been approved by the Head of Administration at Kendawangan region.
  - Maternity leave application form: A worker with the initials MYW apply for maternity leave based on an examination certificate from the doctor at the clinic. The worker is on leave for 90 days/1.5 month before and after giving birth from October 31<sup>st</sup>, 2022, to January 28<sup>th</sup>, 2023. The request has been approved by the Head of Administration at Kendawangan region.

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 February 3<sup>rd</sup>, 2023, for Region Kendawangan, where there are workers' housing facilities, 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 2023 period which explains that the current condition of worker welfare facilities is in good condition.

Based on the results of field observations in KNDM, KNDE, STHE, BSRE and SJYE employee housing areas, it is known that the welfare facilities provided are in proper/good condition, workers' homes consist of 2 bedrooms, 1 bathroom and kitchen, clean water is provided every day, electricity in the form the generator, religious facilities in the form of mosques and churches, sports facilities (football fields, volleyball courts and tennis courts), educational facilities (kindergartens, elementary schools and junior high school), transportation facilities in the form of school buses, as well as other facilities. Clinics are available as worker health facilities that can be accessed by workers and their families. This is supported by the results of interviews with residents of the housing which stated that the housing facilities provided were in decent condition, one house was occupied by 1 head of family and so far, if there were complaints from workers regarding housing facilities, the unit of certification would respond and as soon as possible carry out repair.

Then, based on the results of a review of the labor list documents and interviews with management representatives, it was discovered that the workers at the Rimba Sari Cooperative are the same workers at PT GKG. So that there is no difference in obtaining facilities for all workers.

In accordance with the description above, it can be concluded that the certification unit already has facilities and infrastructure for the welfare of workers in proper conditions and accessible to workers and their families.

**6.2.5**

Based on the results of field visits to employee housing, it is known that the certification unit has an employee cooperative (basic food service unit) that sells basic goods for daily needs. The unit of certification has also provided buildings for small businesses in each employee housing that workers can rent to sell their daily needs or open a canteen business to make it easier for workers and their families to obtain food sources.

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 they can shop at employee cooperatives or food stalls in residential areas. In addition, 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 West Kalimantan Governor's Decree Number 1380/NAKERTRAN/2022 which was stipulated on December 5<sup>th</sup>, 2022, which is IDR 3,085,615. 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 GAP Analysis document for a Decent Living and Calculation of Prevailing Wage for PT GKG and PT GKS Kendawangan Region in 2023 which has been approved by the Regional Head. Wages apply as basic wages, allowances such as THR and rice, facilities such as electricity, housing, water, schools, polyclinic and child care facilities and services. The applicable calculation of wages & benefits varies depending on the type of work and worker status (PTH and PTB).

**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 (*PTH*, *PTB* 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.

Then, based on the results of a review of the labor list documents and interviews with management representatives, it was discovered that workers at the Rimba Sari Cooperative are the same workers at PT GKG. So that all of these workers are permanent workers.

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 Labor and Human Rights Policy which has been in effect since January 2022 and has been signed by the Head of Kendawangan Regional. The policy explains the unit's commitment to giving freedom to workers to form collective bargaining and join trade unions. In addition, the certification unit has a Company Regulation which states that employees have the right to establish labour unions and become members / leaders of trade unions in accordance with applicable regulations.

As a form of implementation of this policy, the certification unit has an *LKS Bipartite* 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 LKS Bipartite 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 LKS Bipartite listed in:

- Proof of registration of *LKS Bipartite* PT GKS at the Office of Manpower and Transmigration at Ketapang Regency with registration number 062/LKS-BI/TKT-B/IV/2019 on October 5<sup>th</sup>, 2021.
- Proof of registration of *LKS Bipartite* PT GKG at the Office of Manpower and Transmigration at Ketapang Regency with registration number 061/LKS-BI/TKT-B/IV/2019 on October 5<sup>th</sup>, 2021.

**6.3.2**

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

- Minutes of meeting *LKS Bipartite* PT GKG management and members which was held on September 1<sup>st</sup>, 2022, and was attended by 14 participants. One of the agendas of the meeting was to discuss reporting of work accidents.
- Minutes of meeting *LKS Bipartite* PT GKG management and members which was held on December 1<sup>st</sup> 2022, and was attended by 15 participants. One of the agendas for this meeting was to discuss the refreshment of the flow of communication and submission of complaints from workers to the unit of certification.

Based on the results of interviews with bipartite representatives and their members who are workers in each unit, it is known that the bipartite 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 the lack of supporting facilities, but this has also been continuously improved by the company to be better.

**6.3.3**

In establishing the Bipartite Committee, the company does this by means of deliberation and together with the workers to determine who will later be elected as representatives of each party (workers and employers) and will then be registered with Manpower Agencies. The election process in this formation, workers are given full freedom, this is evidenced by the results of interviews with workers who are members of the Bipartite Cooperation who stated that the company only chose representatives from the employer side while workers were given the freedom to choose their respective representatives. The result is a balanced number of representatives of workers and employers in the Bipartite Committee, while for the current period the chairman of the bipartite is still from the employer and this is based on the results of the previous deliberation.

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 Labor and Human Rights Policy which has been in effect since January 2022 and has been signed by the Head of Kendawangan Regional. 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, the spray worker with the initials RAN (18 years old or born on June 1<sup>st</sup>, 2004) sent a job application letter on July 9<sup>th</sup>, 2022. Then, the unit of certification shows a daily permanent agreement letter that has been signed by both parties, namely workers and management representatives. 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 *LKS Bipartite* and PT SJA 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 GKG and PT GKS where there are no children under the age of 18 who are employed. In addition, the company has also shown document SOP Employee Recruitment and Selection number BGA-SOP-HC-304.1-R0. 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 administration 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 labor list document and the results of interviews with workers in plantation and factory units as well as management representatives, information was obtained that there were no young workers working in the certification unit. Then, from the results of a study of the list of students who took part in internships or field work practices, it is known that there was a total of 118 students who carried out internships/field work practices in the company's operational areas during 2022. In addition, it is also known that all of these students are over the age of 18 years.

Based on the results of interviews with *LKS Bipartite* representatives and management representatives, it is known that students who do internships/practice in the field 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 KNDE unit on January 5<sup>th</sup>, 2022, and at the BSRE unit on August 18<sup>th</sup>, 2022, and to stakeholders (contractor workers and surrounding communities) on July 18<sup>th</sup>, 2022.

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

Labor and Human Rights Policy document which has been in effect since January 2022 and has been signed by the Head of Kendawangan Regional. 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 January 5<sup>th</sup>, 2022, at KNDE unit. 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 and gender committee officials, 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 Labor and Human Rights Policy document which has been in effect since January 2022 and has been signed by the Head of Kendawangan Regional.

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. For example, in the KNDE unit there are 10 workers who take maternity leave.

Based on the results of interviews with the management of the gender committee, 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, classes for babies, integrated healthcare centre, complementary food for breastfeeding, rooms for breastfeeding, etc.

Based on the results of interviews with the management of the gender committee in each unit, 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. Then based on the results of interviews with female workers, information was obtained that before giving birth the worker or the worker's wife received pregnancy exercise classes to education for caring for the baby in the future. At the time of giving birth, workers or workers' wives will also receive gifts in the form of baby supplies such as diapers, clothes, toiletries, and others.

#### **6.5.4**

The unit of certification has Complaint SOP number BGA-SUST-SOP-40 which was ratified on May 12<sup>th</sup>, 2018, by the Head of Kendawangan Regional. In addition, the unit of certification also has Labor and Human Rights Policy document which has been in effect since January 2022 and has been signed by the Head of Kendawangan Regional. In both 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. Maximum worker response is 15 working days.

These procedures and policies have been socialized in each plantation and factory unit, for example socialization at the BSRE unit on August 18<sup>th</sup>, 2022. In addition, based on the results of interviews with day care officers, it was stated that complaints could be submitted to the direct supervisor, *LKS Bipartite* 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 company shows the Employment and Human Rights Policy which has been in effect since January 2022 and has been signed by the Kendawangan Regional Head. 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 KNDE unit on January 5<sup>th</sup>, 2022, and at the BSRE unit on August 18<sup>th</sup>, 2022, and to stakeholders (contractor workers and surrounding communities) on July 18<sup>th</sup>, 2022. 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 interviews with representatives of the LKS Bipartite, the following information was obtained:

- There were no acts of forced labor carried out by the company. For example, for harvesters who work every day for 7 hours of work. The unit of certification provides an output target (base) that can be obtained in less than 7 working hours. If the harvester obtains more base, he will receive a harvest premium payment. But if they don't get results due to natural factors such as rain, they will not get a penalty. Then, based on the list of payments, harvesters have earned wages above the minimum wage.
- There is no retention of identity documents during the worker recruitment process.
- Every worker who works overtime always signs an overtime order.
- Payment of wages to workers is never late. Salary is given every 7<sup>th</sup> at the beginning of the 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 GKG and PT GKS. The workforce in the company includes permanent workers (*PTH and PTB*) and staff who come from Indonesia. Then from the results of interviews with representatives of the *LKS Bipartite* 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 certification unit has a person in charge of OHS according to the OHS Committee structure which consists of PT. GKG includes MUTE, KNDE, STHE, KNDE and PT. GKS includes BSRE, SRJE and MSJE units. The OHS Committee structure is at PT. GKG and PT. GKS, namely:

- Structure of OHS Committee PT. GKG  
The OHS Committee structure is based on the Decree of the Regent of Ketapang No. 560/139/NAKER/2021 dated 25 August 2021. The OHS Committee structure consists of a Head of OHS Committee, Chief Executive, Secretary, Estate Member, Warehouse and Logistics Section, Electrical and Genset Installation Section, Workplace Inspection Section, workshop and transportation section, training section and OHS training, emergency response section, accident investigation report section and medical team section. Steam and pressure vessel section, mechanical and electrical section, fire prevention and control section and occupational health section. The organizational structure has not changed so that it is still valid today. OHS Committee secretary Rudy Simorangkir is General OHS expert with training certificate no. Ser.18.6679/AK3/U/VI/2019 dated 13 June 2019. General OHS expert appointment from the Indonesian Ministry of Manpower No. 5/7394/AS.01.03/VI/2022 dated 30 June 2022 and OHS expert authority card license No. 71052/PK3/AJ/61/2022/P1 valid until 30 June 2025
- Structure of OHS Committee PT. GKS  
The OHS Committee structure is based on the Decree of the Regent of Ketapang No. 560/138/NAKER/2021 dated 25 August 2021. The OHS Committee structure consists of a Head of OHS Committee, Chief Executive, Secretary, Estate Members, Warehouse and Logistics Section, Electrical and Genset Installation Section, Workplace Inspection Section, workshop and transportation section, training section and K3 training, emergency response section, accident investigation report section and



medical team section. Steam and pressure vessel section, mechanical and electrical section, fire prevention and control section and occupational health section. There has been a change in the organizational structure because the OHS Committee secretary as General OHS expert has transferred to another unit since December 2022 and on January 31, 2023 a renewal has been proposed to the District Manpower and Transmigration Office. Ketapang. Currently OHS Committee Secretary Rudy Simorangkir is General OHS expert with training certificate no. Ser.18.6679/AK3/U/VI/2019 dated 13 June 2019. General OHS expert appointment from the Indonesian Ministry of Manpower No. 5/7394/AS.01.03/VI/2022 dated 30 June 2022 and OHS expert authority card license No. 71052/PK3/AJ/61/2022/P1 valid until 30 June 2025.

The company has held regular meetings between OHS Committee management and employees which are held every month. For example, there are regular monthly meetings including a meeting on January 20, 2023, which was attended by all staff, Head of OHS Committee, OHS Committee secretary, Sustainability PIC and All estate managers as many as 26 people. The meeting discussed several matters including discussing issues related to OSH and evaluating the implementation of OHS in work units. In addition, there are discussions related to sustainability work programs both in OHS, the environment and certification targets.

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

- SOP for First Aid in Accidents (BGA-SOP-GKG-0513-10-R0) which was approved by Area Controller VI on May 15<sup>th</sup>, 2013. The procedure regulates several matters including:
  - The underlying thing is that first aid practice in the workplace is very important to do
  - Basic principles of first aid activities
  - Factors that must be considered in preparing first aid facilities in the workplace
  - Things that must be considered by First Aid Officers
  - First aid officer training
  - Responsibilities of first aid workers
- Accident Investigation Procedure and Report (BGA-SOP-EM-1115.1-R0) which was approved by the Director of Operations of PT. BGA on September 10<sup>th</sup>, 2012. The procedure regulates several matters including:
  - The Scope includes all document and data control activities in the context of implementing SOP for accident reporting and investigation along with its supporting administration in all work units within the BGA group of companies
  - Procedures and responsibilities of designated personnel in accident investigations
  - Internal reporting system
  - External Reporting System
  - Investigation
  - follow up .
- SOP for Emergency Preparedness and Response (BGA-SUST-SOP-25) which was ratified by Area Controller IV on 12 May 2018. The procedure regulates several things including:
  - Scope: emergency preparedness and response activities in GKG and GKS Units .
  - Emergencies: Types of emergencies include fire, explosion, Toxic and hazardous spill and earthquake.

The unit of certification already has First Aid officers who have attended OHS training in the field of First Aid in the workplace. The training was held July 27-29, 2022, with certificate no. 5/0089160922/AS.01.04/IX/2022 which was approved by the Director of OHS RI Institutional Development on 16 September 2022.

In addition, the company has conducted first aid training on 19-20 September 2022 at the Kendawangan Learning Academy (KNLA) which was attended by 110 company foremen and staff. The presenters in this first aid training activity were conducted by General OHS Expert who delivered introductory material and the basics of first aid, first aid officers delivered material on how to transfer work accident victims and company doctors delivered medical emergency materials . All training participants were given a post-test to assess the understanding of each trainee.

Based on field observations, such as harvesting in Block J39 KNDE and Fertilization in Block J16 BSRE, it is known that the foreman carried first aid kits containing 21 types.



The company also documents work accident incidents, for example in December 2022 there were 35 minor work accidents at PT. GKG and can be managed by the company medical team. All OHS activities are evaluated every month, including those discussed at the OHS Committee meeting on January 15<sup>th</sup>, 2023 which was attended by 11 OHS Committee officials and company staff.

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

### 6.7.3

The company has PPE Control SOP No. BGA-SUST-SOP-18 Ratified by Regional Head 4A on 12 May 2018, which contains including:

- Identification PPE needs.
- coaching
- PPE use
- PPE Care and Storage
- Maintenance and Disposal of PPE
- Procurement for new PPE
- PPE provider to employee
- Replacement of damaged PPE or is lost.
- Inspection
- Reporting

The company has categories of types, functions and specifications of PPE, including:

- Provisions for eye and face protection equipment, in the form of safety glasses (*spectacles*), goggles, face shield, diving mask, face shield and goggles in unity (*full face mask*). This type of PPE is to protect the head from collisions, bumps, falls or hits from sharp objects or hard objects that fly or slide through the air, exposure to heat radiation, fire, splashes of chemicals, microorganisms and extreme temperatures.
- Hand protection, in the form of gloves made of metal, leather, canvas cloth, cloth or coated cloth, rubber, and chemical resistant gloves. This PPE is used to protect hands and fingers from exposure to fire, hot temperatures, cold temperatures, electromagnetic radiation, ionizing radiation, electric currents, chemicals, impacts, blows and scratches, infection with pathogenic substances (viruses, bacteria) and dead bodies. tiny.
- Protective clothing, in the form of vests, aprons, jackets, and protective clothing that covers part or all of the body. This PPE is used to protect the body part or all of the body from the dangers of extreme hot or cold temperatures, exposure to fire and hot objects, splashes of chemicals, hot liquids and metals, hot steam, impact with machines, equipment and materials, scratches, radiation, animals, pathogenic micro-organisms from humans, animals, plants and the environment such as viruses, bacteria and fungi.

Based on the document review, it is known that there are PPE stocks in each unit, including:

- PPE stock at KNDM, consisting of 5 pcs safety glasses, 200 pairs of leather gloves, 100 pairs of cloth gloves, 15 pairs of rubber gloves, 15 pcs of safety helmet, 14 pairs of safety shoes, 6 sets of aprons, 5 pcs of welding cups
- PPE stock at STHE, consisting of 272 pcs of safety helmets, 20 pcs of cloth gloves, 50 pcs of boots, 80 pcs of full-face safety helmets, 0 pcs of safety goggles
- PPE stock at BSRE, consisting of 19 pcs of safety helmets, 0 pcs of cloth gloves, 60 pcs of boots, 36 pcs of face shields, 101 pcs of safety glasses
- PPE stock at SJYE, consisting of 23 pcs of safety helmet + face shield, 45 pcs of cloth gloves, 200 pcs of boots, 0 pcs of face shield, 0 pcs of safety goggles
- PPE stock at KNDE, consisting of 188 pcs of safety helmets, 0 pcs of cloth gloves, 503 pcs of boots, 77 pcs of face shields, 36 pcs of safety goggles)

The company also shows examples of PPE handover, including:

- February 14 2022, 11 safety glasses for 11 harvesters at KNDE
- May 04, 2022, 11 helmets and 11 boots for the KNDE harvester

- March 01 2022, 1 helmet and 2 boots for STHE harvesters

Based on the results of observations of harvest work at KNDE, STHE, BSRE including Rimba Sari Cooperative and SJYE it is known that harvesters have used complete PPE, namely in the form of helmets, gloves, goggles and boots. There are only a few new harvesters who are not used to wearing glasses because they are not used to doing harvest work.

The company provides free PPE to harvesters.

Based on observations of harvesting at KNDE, STHE, BSRE including Rimba Sari Cooperative and SJYE it is known that harvesters have used complete PPE, namely in the form of helmets, gloves, goggles and boots. There are only a few new harvesters who are not used to wearing glasses so it takes some getting used to

Based on the description above Companies have the opportunity to ensure that all harvest workers consistently use eye protection PPE while working. **OFI**

The company has a team system for plant maintenance activities for both fertilizing workers and spraying weeds. The company has a BMS (*BGA Manuring System*) in managing fertilization work including a place to clean work tools, PPE, and used fertilizer packaging waste. The weed spray work is regulated in the BGS (*BGA Ground Management and Spraying System*), including a place to clean work tools, PPE, and used pesticide packaging waste. Spray employees and fertilizer employees change work clothes at BMS and BGS before work and use complete PPE during work in the form of aprons, long sleeves, rubber gloves, full face shield helmets, masks and boots. Employees return to BGS and BMS after work to clean up before going home.

#### 6.7.4

The certification unit already has a list of workers which also includes *BPJS* of Employment 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* of Employment for the same period, it is known that companies have registered and paid all their workers in the *BPJS* of Employment program, which consists of work accident insurance, death benefit, old age benefit and pension benefit via bank transfer with details as follows:

- KNDM
  - The list of workers in the KNDM unit for the period of December 2022 is 130 workers.
  - Proof of payment for *BPJS* of Employment for the December 2022 period for a total of 130 workers on January 13<sup>th</sup>, 2023.
- KNDE
  - The list of workers in the KNDE unit for the period of December 2022 is 337 workers.
  - Proof of payment for *BPJS* of Employment for the December 2022 period for a total of 337 workers on January 13<sup>th</sup>, 2023.
- MUTE
  - The list of workers in the MUTE unit for the period of December 2022 is 399 workers.
  - Proof of payment for *BPJS* of Employment for the December 2022 period for a total of 399 workers on January 13<sup>th</sup>, 2023.
- STHE
  - The list of workers in the STHE unit for the period of December 2022 is 516 workers.
  - Proof of payment for *BPJS* of Employment for the December 2022 period for a total of 516 workers on January 13<sup>th</sup>, 2023.
- BSRE
  - The list of workers in the BSRE unit for the period of December 2022 is 351 workers.
  - Proof of payment for *BPJS* of Employment for the December 2022 period for a total of 351 workers on January 13<sup>th</sup>, 2023.
- SJYE
  - The list of workers in the SJYE unit for the period of December 2022 is 488 workers.
  - Proof of payment for *BPJS* of Employment for the December 2022 period for a total of 488 workers on January 13<sup>th</sup>, 2023.
- MSJE
  - The list of workers in the MSJE unit for the period of December 2022 is 483 workers.
  - Proof of payment for *BPJS* of Employment for the December 2022 period for a total of 483 workers on January 13<sup>th</sup>, 2023.
- MKNR
  - The list of workers in the MKNR unit for the period of December 2022 is 208 workers.
  - Proof of payment for *BPJS* of Employment for the December 2022 period for a total of 208 workers on January 13<sup>th</sup>, 2023.

The certification unit has also included some of its employees in the *BPJS* Health program. From the results of a review of the

workforce list document for the December 2022 period, it is known that the total number of workers from PT GKG and PT GKS is 2,912 people. Then, the certification unit showed proof of *BPJS* Health payment for 1,614 workers on December 8<sup>th</sup>, 2022. Based on the results of interviews with workers in the sampling unit, for example security at the KNDM unit, information was obtained that the company had included workers and their families (wives and children) in the *BPJS* Health. This can be proven in the worker's pay slip document for December 2022 that there is a deduction for *BPJS* Health. In addition, based on the results of interviews with harvest workers at the SJYE unit, information was obtained that these workers had not been registered and had not received a *BPJS* Health card.

The unit of certification indicates:

- Minutes of *BPJS* Health Registration for the Kendawangan Region number 001/GKG-GKS/1/2023 on January 18<sup>th</sup>, 2023.
- Evaluation of the Progress of *BPJS* Health Membership in the Kendawangan Region number 003/GKG-GKS/i/2023 on January 19<sup>th</sup>, 2023.
- *BPJS* Health Membership Achievement Program for All Employees number 005/ GKG-GKS/i/2023 on January 29<sup>th</sup>, 2023.

Based on the results of the document review above, it is known that as of January 2023 the company has registered 746 workers in the *BPJS* Health program, but there has been no feedback from *BPJS* Health. Workers who have not been registered are workers who are active in other health insurance such as PBI (APBD), PBI (APBN), husband's dependents, independent *BPJS*, etc. *BPJS* Health registration for all workers at PT GKG and PT GKS will continue until August 2023 with a target of 100%.

Based on the results of a review of the labor list documents and interviews with management representatives, it was discovered that workers at the Rimba Sari Cooperative are the same workers at PT GKG. So, there is no difference in getting insurance of work accident or health. All workers have been registered with the *BPJS* of Employment program, but the *BPJS* Health program is still in progress.

From the description above, it can be concluded that the certification unit has the opportunity to register and distribute *BPJS* Health cards to all of its workers according to a predetermined plan. **OFI**

**6.7.5**

The CH showing table calculation of Frequency Rate (FR) and Severity Rate (SR), among others for PT. GKG and PT. The GKS period from January to December 2022 uses LTA. In the LTA table there are data on the number of employees, the number of working days, the number of working hours per day, the number of working hours in 1 month, the 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. In the December 2022 period PT. GKG has 2,292 employees, the total working hours in December 2022 is 369,025 hours and there is a work accident which causes 2 working days to be lost, so the FR value is 149 meaning that in December 2022 there was a loss of working time of 149 hours per million workers, this figure shows workers not at work after a work accident. In addition, in December 2022 there is an SR value of 5 meaning that during the December 2022 period there was a loss of working time of 5 days per million hours worked.

In addition, the company showed work accident records using LTA in PT. GKS. In the December 2022 period PT. GKS has 1,487 employees, total working hours in December 2022 237,884 hours and there were work accidents which caused 4 working days to be lost, so the FR value is 113 meaning that in December 2022 there was a loss of working time of 113 hours per million workers, this figure shows workers not at work after a work accident. In addition, in December 2022 there is an SR value of 16 meaning that during the December 2022 period there was a loss of working time of 16 days per million hours worked.

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

**Status: Comply**

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

**7.1**

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

**7.1.1**

The company has SOP for Observation and Control of Plant Pest Organisms with Document No. BGAAGRKS-PTKS-PHT and BGAAGRKS-PTKS-PG for weed control. Inside document the explained, among others:

- 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 pikul market.
- Among them contains a rat pest control system with a 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

PT. GKG and PT. GKS are developing *Beneficial Plants* including *Turnera Subulata* and *Antigonon Leptopus* which are spread across in unit

The company conducts EWS every day against plant pest attacks and conducts a census if heavy attacks are found.

Potential pests that exist include rats, horn beetles, and Caterpillars, this is in accordance with the EWS which will be implemented in 2022. The following are the conditions for potential pests and their control methods:

- Rat Pests  
Based on EWS results in July there were pest attacks between 0% and 10.3%. The company conducts a census of blocks that have heavy attacks > 5% including in blocks L14a and L15a Division 2 STHE, so it requires control of rat pests using insecticides using Racumin. After 2 rotations of Racumin application with intervals of 4-5 days the amount of bait lost was <20% so that the third rotation of Racumin was not applied. Based on a document review, in 2022 STHE used 400 Racumin, but this is lower compared to 2021 using 608 Kg of Racumin.  
In addition, there are methods of prevention and control of rat pests in GKS and MPD by biological means, namely through the development of the natural predator *Tyto Alba*, including those in Block I39 Division 3 KNDE and K19 Division 3 STHE
- Pests of caterpillars and Bagworms  
effective inspection and control. The company has also developed natural predators through the development of *Turnera subulata* and *Antigonon leptopus* to maintain a balance of pests and natural predators so that they do not use chemicals in their control, including in block J16 Division 2 BSRE and block H08 Division 1 RBSE
- Beetle Pests Horn  
Handling of horn beetles for mild attack levels, which are less than 3% of the principal amount per hectare, is handled by quoting manually. Moderate attack with an indicator between 3% -5% of the principal amount per hectare, handling is carried out by picking and/or demolishing or pruning the affected trees. For attacks that enter the severe level with an attack indicator of more than 5% of the principal amount per hectare, countermeasures are carried out by placing pheromone-filled traps to destroy the beetles, or by dismantling the affected trees. Based on the results of the latest EWS conducted in December 2022, no horn beetle attacks were found above 5%, so there was no control using insecticides.

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.

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 the document review, interviews with the Estate Manager, and field observations at GKG and GKS 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*, and these species are not invasive in Indonesia.

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

### 7.1.3

As explained in indicator 7.1.1, the unit of certification in PT. GKG and PT. GKS 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 unit of certification has procedures related to the use of pesticides, among others there is a policy related to the use of limited pesticides as stated in the Internal Agriculture & Technical Circular dated May 9<sup>th</sup>, 2015 from the Head of Oil Palm Research to all Area Controllers, containing:

- Group 1A and 1B herbicides (*Paraquat*) are no longer used in weed control.
- For Estates that have stock of paraquat herbicide, it can be used until the herbicide runs out and is not allowed to return to make new requests or purchases.
- To control weeds around the wood weeds where *nephrolepis* is not using *methylmetsulfuron* but using *triclopyr*.

The company also shows the BGAAGRKS-SOP-14 procedure 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 circle, path and collection point. To determine the need for spray volume per hectare, the company calibrates the spray equipment, nozzles, and road speed so that the dosage and volume of the spray solution is correct and not excessive. The company has determined the pesticides used for weed control, for example the active ingredient *Glyphosate* to control Imperata, broad and narrow leaf weeds, and the active ingredient *Methyl Metsulfuron* to control legume weeds, *Caladium*, and *stenochlaena palustris*.

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

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

7.2.2

The CH shows the realization of the use of pesticides in 2022 in KNDE, MUTE, BSRE (included Rimba Sari Cooperative), STHE, SJYE and MSJE, such as:

ESTATE	TRADEMARK	INGREDIENT	LD 50 (MOUTH)	LD 50 (SKIN)	AREA	VOLUME	SATUAN
			Mmg/Kg Body Weight	Mmg/Kg Body Weight	HA		
KNDE	Penta Up	<i>Glyphosate</i>	>5,000	>2,000	5,718	985	Lt
	Racumin	<i>Coumatetralyl</i>	1,000	4,000	417	292	Kg
	Starlon	<i>Triklopir Btoksi Eter</i>	1,378-1,581	>2,000	2,064	130	Lt
BSRE	Penta Up	<i>Glyphosate</i>	>5,000	>2,000	7,230	1,900	Lt
	Metafuron 20 WG	<i>Metil Metsulfuron</i>	>5,000	>2,000	7,230	117	Kg
	Racumin	<i>Coumatetralyl</i>	1,000	4,000	349	244	Kg
	Starlon	<i>Triklopir Btoksi Eter</i>	1,378-1,581	>2,000	2,505	715	Lt
STHE	Fuscinate	<i>Amonium Glufosinate</i>	>5,000	>2,000	4,640	2,381	Lt
	Penta Up	<i>Glyphosate</i>	>5,000	>2,000	9,427	652	Lt
	Metafuron 20 WG	<i>Metil Metsulfuron</i>	>5,000	>2,000	9,427	174	Kg
	Racumin	<i>Coumatetralyl</i>	1,000	4,000	586	410	Kg
	Starlon	<i>Triklopir Btoksi Eter</i>	1,378-1,581	>2,000	8,429	470	Lt
	Fuscinate	<i>Amonium Glufosinate</i>	>5,000	>2,000	9,427	1,038	Lt



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

As explained in indicators 7.2.1 and 7.2.2 that the unit of certification at KNDE, MUTE, BSRE (included Rimba Sari Cooperative), STHE, SJYE and MSJE prioritizes pesticide products and application methods selectively so that it shows a graph of a decrease in pesticide use. As example use pesticides in KNDE trademark Penta Up ingredients active *Glyphosate* in 2021 will be 4,420 Lt and in 2022 the use of *Glyphosate* will be 985 Lt. There is use Trademark herbicide Metafuron 20 WG ingredients active *Methyl metsulfuron* in 2021 as much as 397 Kg and in 2022 198 Kg. Besides that, use Pesticides in STHE are trademarks of Penta Up ingredients active *Glyphosate* in 2021 will be 2,965 Lt and in 2022 the use of *Glyphosate* will be 652 Lt. Besides That, there is use Trademark herbicide \_ Metafuron 20 WG ingredients active *Methyl metsulfuron* in 2021 as much as 226 Kg and in 2022 174 Kg, and the use Fuscinate material active *Ammonium Glifusonate* in 2021 it will be 1,329 liters and in 2022 it will be 1,038 liters

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. To suppress weed growth, the company developed the *Mucuna Brachteata* legume.

As for controlling pests and plant diseases, the company prioritizes biological methods, namely through the development of Beneficial Plants of the *Turnera Subulata* and *Antigonon Leptopus* types as the results of field observations of these plants include growing in blocks J39 J40 I39 I40 Division 3 KNDE and Block J16 Division 2 BSRE

Based on the description above, it shows that the company has minimized the use of pesticides according to the IPM plan.

### 7.2.4

The company has SOP for Observation and Control of Plant Pest Organisms with Document No. BGAAGRKS-PTKS-PHT and BGAAGRKS-PTKS-PG for weed control. Inside \_ document the explained, among others:

- 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 harvesting path.
- Among them contains a rat pest control system with a 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, rats, tiratabha, termites and diseases. oil palm plants. Pest control is carried out if the census results show moderate to severe attack categories. In addition, Plant Disease Pests control prioritizes biological methods including the development of Beneficial Plants of the *Turnera Subulata* and *Antigonon Leptopus* types.

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

### 7.2.5

The CH shows policy related with use pesticide limited as listed in Internal Agriculture & Technical Circular No. 016/IOM/RSC/II/2015 dated May 9<sup>th</sup>, 2015 from the Head of Oil Palm Research to whole *areas Controllers*, contains:

- Group 1A and 1B herbicides (*Paraquat*) are no longer used in weed control
- For Estates that have stock of paraquat herbicide, it can be used until the herbicide runs out and is not allowed to return to make new requests or purchases
- To control weeds around the wood weeds there are *nephrolepis* instead of using *methyl metsulfuron* but using *triclopyr*.

The company also shows the BGAAGRKS-SOP-14 procedure 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.

Based on the results of field observations, interviews with field supervisors and paraquat stock taking in warehouses at KNDE, MUTE, BSRE, STHE, SJYE and MSJE that this Paraquat type pesticide is no longer used in the unit of certification.



the World Health Organization (WHO) Class 1A or 1B list or included in the Stockholm or Rotterdam Conventions and paraquat are not used.

#### **7.2.6**

The CH shows procedures BGAAGRKS-SOP-14 regarding management pesticides. In this SOP arranged groups pesticides used, procedures prevention accident consequence poisoning, as well protection environment with use pesticide in a manner responsible answer

The company has a pesticide applicator training program in 2022. Following are some realizations of pesticide management training that has been conducted internally by the company:

- Training on management and use of chemicals (pesticides) on January 22<sup>nd</sup>, 2023 at BSRE which was attended by 14 BSRE spray employees with EHS Assistant and Division Assistant facilitators. The material presented is related to the calibration of spray equipment, road calibration, how to spray properly and correctly and how to use the correct PPE.
- Pesticide applicator training on 14 December 2022 at KNDE which was attended by 17 spray employees and spray foremen. The material presented is how to spray properly and correctly and how to use the correct PPE.

The results of observations in the field show that the pesticide applicator can use the sprayer properly according to the target weeds. In addition, all pesticide applicators understand OSH by using complete PPE as pesticide applicators. The results of interviews with pesticide applicators at STHE and SJYE found that employees can use pesticides in accordance with work techniques determined by the company. MSDS is also available in the Pesticide Warehouse in a language that employees can understand.

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

#### **7.2.7**

The company has procedures governing how to select pesticides, use pesticides and store pesticides in document no. BGAAGRKS-PROS-PPS-01 entitled Procedure for Pesticide Safety Instructions which was approved by the Director on 27 May 2011.

Based on the results of field observations in the pesticide warehouse of PT. GKG and PT. GKS that the warehouse is made permanent equipped with exhaust vents, well ventilated, pesticides are not mixed with other materials, there are facilities for mixing pesticides, there are emergency response facilities such as eyes washers and sufficient sand, warnings 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 documents related to SOPs for storing pesticides, the unit of certification has SOPs for waste disposal, namely SOP BGA-SUST-SOP-21 on 12 May 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 has rinsed a minimum of 3 times 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 field observations at the agrochemical warehouse and hazardous waste storage area at PT Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa, it is known that the pesticide storage area is specially provided with adequate ventilation and an isolated location. There is also BGA Management Spraying System (BGS) provided by estate management unit for 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. Used pesticide packages classified as Hazardous Waste were also found stored in a well-monitored Hazardous Waste storage warehouse which was then handed over to licensed collectors. Unit of certification shows last hazardous waste was transported on 04 November 2022, which PT Semesta Langgeng Sentosa did as a licensed hazardous waste transporter.

Based on interviews with pesticide application officers at KNDE, STHE, BSRE, and SJYE, it was found that all containers used for pesticide packaging were returned and sent to the Hazardous Waste Warehouse and were not used for purposes other than pesticide application activities. All used packaging containers, work tools and work clothes are stored in a special storage area, so that no contaminated items are taken home. The results of observations in the employee housing area showed that there was no reused pesticide packaging.

**7.2.9**

Weed control and plant pest at PT. GKG and PT. GKS is manually and chemist. Based on interviews with chemist foremen and pesticide applicators at KNDE, BSRE and SJYE as well as field observations it is known that pesticide spraying 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**

The CH owns policy inspection health consists of 3 types that is inspection health before work , inspection health periodic checks and checks health special . Inspection health periodically for employee with working time One year or more when the MCU is executed. As for the type of inspection health periodically that is inspection physical. Whereas inspection special among them inspection blood routine and routine urine examination, examination audiometry 1 year once, check spirometry 1 year once, and other checks can be done in accordance with need based on danger potential certain work area.

In 2022 the company do inspection health special and regular to whole employees, among others inspection health periodically at KNDE 120 people, SJYE 273 people, KNDE 321 people, STHE 287 people, BSRE 216 and MUTE 218 people. The results of the health examination did not reveal any occupational diseases. In addition, the results of special medical examinations for pesticide applicators and fertilizer applicators also did not show any occupational diseases. All employees are advised to eat healthy with balanced nutrition, drink lots of water and exercise regularly. The company also provides multivitamins which are routinely given to harvest employees and in 2023 will be given to all employees as a preventive measure in maintaining employee health conditions.

Based on the description above, it shows that the company has a record of the results of a special

**7.2.11**

The company has procedures governing pesticide applicators in document no. BGAAGRKS-PROS-PPS-01 entitled Procedure for Pesticide Safety Instructions which was approved by the Director on May 27<sup>th</sup>, 2011. In this procedure there is a prohibition for pregnant and lactating women to work as pesticide applicators. In addition, the company has a policy that all female pesticide applicators are required to take a pregnancy test every month at the company's clinic. Based on the document review, there are the results of a pregnancy test, namely:

- On January 20<sup>th</sup>, 2023 at KNDE there were 31 pesticide management employees with negative results
- On January 12<sup>th</sup>, 2023 at SJYE there were 42 pesticide management employees with negative results
- On January 10<sup>th</sup>, 2023 at BSRE there were 51 pesticide management employees with negative results

In addition, based on the results of interviews at KNDE, SJYE and BSRE, it is known that the youngest pesticide applicator is 23 years old.

Based on the description above, it shows that no work related to pesticides is carried out by pregnant or lactating women, or people with medical limitations and all pesticide applicators are over 18 years of age

**Status: Comply**

**7.3**

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

**7.3.1**

All waste products and sources of pollution have been identified and documented in the SOP BGA-SUST-SOP-21 on 12 May 2018. Based on document verification shown company has implemented waste management accordance with waste identification source and management plan for examples are:

- Estates, waste source: chemist activities, waste type: ex pesticides containers (toxic and hazardous waste), clinic waste, managed by stored in optimalization store and sent to related transporters
- Mill, waste source: FFB process, waste type: shell and fibre (non-toxic/hazardous waste), managed by renewable energy usage for boiler
- Mill, waste source: FFB process, waste type: palm oil mill effluent, managed by the effluent pond and land applications as nutrient cycle.
- Estates, waste source: pruning activities, waste type: oil palm frond (organic waste), managed by frond stacking.

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, the company does not reuse it, but only temporarily stores it located in PT Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa. The unit of certification also has a licensed hazardous waste storage area, including:

- Permit for Temporary Storage of Hazardous and Toxic Waste for PT Gunajaya Karya Gemilang based on Decree of Ketapang Regent Number 291/Perkim-LH dated 30 May 2017 and is valid for 5 years.
- Permit for Temporary Storage of Hazardous and Toxic Waste for PT Gunajaya Ketapang Sentosa based on Decree of Ketapang Regent Number 290/Perkim-LH dated 30 May 2017 and is valid for 5 years.

Based on result of interview with the Public Housing, Settlement Area, and Environmental Agency of Ketapang Regency, hazardous waste storage permits owned by the unit of certification are still valid as long as the business license owned by the unit of certification is valid as long as there are no technical changes to the storage of hazardous waste based on Government Regulation No. 22 of 2021. Results of a field visit to the hazardous and toxic waste temporary storage in KNDE and SJYE, hazardous and toxic waste keeping techniques are in accordance with the provisions contained in the permits such as coordinate points, building area, type of waste stored, and completeness of emergency response facilities. The unit of certification has shown progress in issuing the technical details for storing hazardous and toxic waste which will be integrated with the environmental documents it has based on Ministry of Environment and Forestry Regulation No. 06 of 2021. Until the assessment was carried out, the unit of certification had held a meeting with Ministry of Environment and Forestry on 20 January 2023 to process the validation and verification of the technical details that had been made.

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 4 November 2022 by PT Semesta Langgeng Sentosa which is a licensed party. Unit of certification can show a cooperation agreement with the carrier (PT Semesta Langgeng Sentosa), which is based on the document Agreement number 015/MOU/GKG-SLS/VI/2022 (PT Gunajaya Karya Gemilang) and number 016/MOU/GKS-SLS/VI/2022 (PT Gunajaya Ketapang Sentosa) on 18 June 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 (4 November 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.

The result of field visits to hazardous waste storage warehouses at PT Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa also show that unit of certification has carried out hazardous waste management quite well. All obligations listed in the waste storage permit have been fulfilled, such as the availability of fire extinguishers, showers, eyewash, coordinates, alarms, first aid kits, oil traps and appropriate labelling. In addition to good lighting and air ventilation, unit of certification also has drainage channels on the outside of the warehouse to anticipate pollution to the surrounding environment. The results of interviews with storage managers also show that managers fully understand the SOP for hazardous waste management and mitigation actions in the event of potential pollution. Unit of certification has also reported the results of hazardous waste management which is carried out every quarter with evidence of Report of Hazardous Waste Management from PT Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa of fourth quarter of 2022 which were reported to Public Housing, Settlement Area, and Environmental Agency of Ketapang Regency on 31 January 2023.

#### **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.

The results of field observations in the landfill and emplacement area showed that there were no traces of combustion, all domestic waste was disposed of in waste collection tanks scattered throughout the building. The results of interviews with residents of the emplacement also stated that the unit of certification routinely carried out socialization related to domestic waste management, either directly through meetings, or indirectly by installing signboards prohibiting burning trash and littering.

**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 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 interviews with estate and mill manager and manager of hazardous waste warehouse, it was found that they understood the handling of waste disposal, especially hazardous waste and domestic waste and its management as regulated in the unit of certification's procedures. The waste warehouse manager can also explain the technicalities related to waste management, such as the treatment of incoming and outgoing goods, recording, and reporting, transportation period, handling in the event of a work accident and other actions regulated in unit of certification procedures. The results of the verification of the Hazardous Waste Logbook document also show that all incoming and outgoing waste has been properly documented and in accordance with its actual conditions. All hazardous waste generated in each division will be sent to the hazardous waste warehouse a maximum of 1 week from the date the waste was generated, previously stored in a special room that has been provided in each division office.

The results of interviews with workers who live in the emplacement area also stated that the waste management carried out by the unit of certification was very good and regular. Trash cans are provided properly, all waste disposal facilities have also been provided by the unit of certification such as organic and non-organic waste bins that will be replaced if damaged, hazardous waste warehouses and landfills. The resource persons also understand very well how to separate the types of waste they produce and what types of waste should not be reused.

**7.3.3**

Unit of certification does not carry out open burning to destroy waste, this can be proven from field observations in residential area and its landfill in each estate, which did not find any traces of burnt waste. The results of interviews with employees in mill and estate (i.e. WWTP operator and generator officer) also stated that they had never burned waste, because they were aware of the prohibition on burning activities. Garbage from housing is disposed of in the bins that have been provided, then transported every 2 times a week and disposed of in landfills and then buried when it is full. The results of field observations in employee housing areas in KNDE, STHE, and BSRE also show many warnings to prohibit waste burning activities as well as the dangers that can arise from burning activities. Interviews with management also explained that the regulations regarding the prohibition of burning have been understood by all workers and strict action would be taken if they violated them.

**Status: Comply**

**7.4**

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

**7.4.1**

The CH owns procedure in manage fertility land in SOP No. Certified BGA-AGR-KS-SOP May 25, 2011, among others installation and maintenance system drainage (SOP-04), water and soil conservation (SOP-05), planting legumes or LCC (SOP-06), management weeds (SOP-08) and fertilization (SOP-09), and management land marginal (SOP-16), and related Leaf and soil analysis in internal memo No. 004/IOM/RSC/III/15 dated 07 December 2015 and No. 53/RSC-ADM/XII/15 dated 07 December 2015

as base For calculation recommendation fertilization .

Based on results interviews and observations at KNDE, STHE, BSRE (included Rimba Sari Cooperative) and SJYE are known that unit of certification has do things following this:

- The realization of fertilization is based on the recommendations of the research department that conducts leaf and soil analysis
- LCC planting like *Mucuna Bracteata* and maintenance *Neprolepis*
- Control weeds done in a manner selective
- Arrangement drainage, monitoring height groundwater level and monitoring of subsidence land peat

The unit of certification also performs empty fruit bunches and POM liquid waste applications. For 2022, applications for vacancies at SBDE 12,707 tons, SJYE 7,547 tons, MSJE 18,917 tons, MUTE 13,041 tons, STHE 19,236, KNDE 5,922 and BSRE 5,119 tons. Meanwhile, the application of POM liquid waste in 2022 at KNDE is 115,320 tons and at STHE is 61,121 tons.

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 does fertilization based on results of leaf analysis and analysis land held by the Department research of PT. BGA. Leaf analysis and soil analysis arranged according to internal memo No. 004/IOM/RSC/II/15 and No. 53/RSC-ADM/XII/15 dated 07 December 2015. Leaf and soil analysis is carried out annually by the BGA Group Research Department Analysis Laboratory. As for soil samples, only 20% of the block area was taken.

For the 2022 fertilization program, the certification unit has conducted a leaf analysis on June 14<sup>th</sup>, 2021 by the Analytical Laboratory Research Department of PT. BGA with certificate number 0044L/AL-BGA/INT/IV/2021. The number of leaf samples taken was 36 leaf samples. The nutrient content analyzed was N, P, K, Mg, Ca, B, Cu.

Soil analysis was also carried out by the Analytical Laboratory Research Department of PT. BGA with certificate no 0054S/AL-BGA/INT/VI/2021 on June 3<sup>rd</sup>, 2021. The number of soil samples taken was 60 soil samples. The nutrient content analyzed included pH, Total N, C-Organic, C/N, P, K, Ca, Mg and CEC.

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 company has used EFB and POM liquid waste as an alternative method for managing soil fertility. The 2022 EFB application will be carried out at SBDE 12,707 tons, SJYE 7,547 tons, MSJE 18,917 tons, MUTE 13,041 tons, STHE 19,236, KNDE 5,922 and BSRE 5,119 tons.

Meanwhile, the application of PMKS liquid waste in 2022 at KNDE is 115,320 tons and at STHE is 61,121 tons.

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, for example in Block I15a BSRE NPK Granule 13:6:27+0.65B of 34,425 Kg, Block J4oa KNDE of Dolomite fertilization of 8,634 Kg, Block L17a SJYE of NPK Granule 13 fertilization :6:27+0.65B as much as 12,512 Kg.

In addition, there is organic fertilization in the form of empty fruit bunches in 2022 which will be carried out at SBDE 12,707 Tons, SJYE 7,547 Tons, MSJE 18,917 Tons, MUTE 13,041 Tons, STHE 19,236, KNDE 5,922 and BSRE 5,119 Tons.

Meanwhile, land application in Kendawangan POM in 2022 is 115,320 tons and at STHE is 61,121 tons

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 unit of certification shows Soil Map derived from the HCV reports of PT GKG and PT GKS in 2012 with scales varying from 1 : 95,000; 1 : 80,000 and 1 : 10,000, summarized as follows:

**Distribution of Soil Type**

<b>SoilType (USDA)</b>	<b>PT GKG (ha)</b>	<b>PT GKS (ha)</b>
Alluvial Inceptisols	-	6,884
Entisol	792.90	3,925
Histosol ( Hemist 1-2 m)	1,620.20	1,400.33
Inceptisols	4,423.10	51.80
Ultisol	2,749.50	-
<b>Total</b>	<b>9,585.70</b>	<b>12,720.13</b>

**Distribution of Marginal Soils**

<b>Marginal Soils</b>	<b>PT GKG</b>	<b>PT GKS</b>
Deep sand	615.50	271.59
Spodic sand	69.70	1,113.34
kaolin	1,759.05	2,956.47
Lateritic	2,332.12	-
Slopes >8 %	147.90	-
Lowlying land	2,681.49	1,348.08
Tidal	89.99	3,498.01

Based on the Tables above, it was known that there are no fragile soils but marginal categories, due to the presence of shallow peat for about 17% and 11 % in PT GKG and PT GKS, respectively. Other limitations were mainly due to the presence of sandy soils which affect draining properties, low-lying and tidal areas which are prone to flooded, acidic soils, as well as the presence of lateritic and kaolin areas which inhibit rooting activities of palms.

**7.5.2**

Based on the statement area data of PT. GKG and PT. GKS It is known that planting year is between 2007 and 2016. In addition, in the company's agronomic procedures related to replanting Number BGAAGRKS-SOP-17 it is known that replanting can begin after the plants are 25 years old, namely around 2032, so this indicator cannot be applied because there are no areas yet. which have been replanted.

**7.5.3**

Based on the areal statement data, it is known that the year of planting at PT. GKG and PT. GKS between 2007 and 2016. The entire area of PT. GKS consists of a flat slope class of 0-8%, while PT. MPD consists of flat slopes (0-8%), gentle slopes (8-15%), rather steep (15-25%) and no areas with steep slopes (25-40%). In addition, based on the results of field observations at PT. GKG (MUTE, STHE, KNDE) and PT. It is known that GKS (BSRE, SJYE, MSJE) does not have land with steep or very steep slopes.

**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 show map acquired land from the PT GKG and PT GKS land surveys conducted on 20 to 27 November 2015. Report the inform that some land in the unit of certification is marginal (S3) because a condition like exists peat shallow (hemist), ground sour, area land sandy, laterite, area plains low and high tide, land with fertility low, etc. However, there are no limitations due to hilly to steep slope conditions. In addition, there are no areas with land class N1 (not suitable) and N2 (permanently not suitable). At the time the audit was carried out, there were no new planting activities in the company's area. Companies can show topographic maps and land surveys in the management and development of planting areas such as making roads, bridges, water gates, ditches

and other infrastructure.

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**

Based on the document review and field observations, no planting was found on marginal land. Companies manage planting areas in various ways, including:

- Selective weed control to maximize soil cover
- Maintain the growth and development of *Neprolapheis*
- Organic fertilization in the form of empty fruit
- Land application
- Fertilization according to the recommendations based on the results of leaf analysis and soil analysis
- Regulate drainage and maintain groundwater levels
- Measuring subsidence benchmarks or monitoring the rate of subsidence of peat soils
- Active in preventing land fires

At the time the audit was carried out, there were no new planting activities in the company's area.

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

**7.6.3**

Based on the topographic map it is known that the entire area of PT. GKS consists of a flat slope class of 0-8%, while PT. GKG consists of flat slopes (0-8%), gentle slopes (8-15%), rather steep (15-25%) and no areas with steep slopes (25-40%). In addition, based on the results of field observations at PT. GKG (MUTE, STHE, KNDE) and PT. GKS (BSRE, SJYE, MSJE) It is known that the area in UoC does not have land with steep or very steep slopes. The company has used this topographic and land survey information to determine the water gate, among other things, so that it can maintain water availability. Besides That, used for making other means of transport road stockpile in peat areas

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 15<sup>th</sup>, 2018 and all peatlands are managed responsibly.**

**7.7.1**

Some PT. GKG and PT. GKS is a peat area. Based on the areal statement data, it is known that the year of planting at PT. GKG and PT. GKS between 2007 and 2016 and no planted area in 2018.

**7.7.2**

Unit of certification shows communication process via email towards peat inventory report delivery to GHG Unit of RSPO, summarized as follows:

- First Peat Inventory of BGA report delivery to RSPO on 23 October 2019.
- First response given by RSPO on 12 March 2020 with notes clarification questions that does the uncertified plantation on peat has been included the previously submitted peat inventory and to specify estate name (if any ).the company is required to perform to submit RSPO Peat Inventory (uncertified unit) and Peat Map by 31 March 2020 and to submit shape files latest by 31 May 2020. This email has responded on the same date which stated that both certified and uncertified plantations on peat have been included into peat inventory submitted to RSPO.
- On 18 March 2020, BGA has emailed the RSPO GHG Unit to clarify that after looking at the data disclosed for the 2018 Peat Inventory, the company identify some errors and commissions which would like to rectify peat matters in PT Ladang Sawit Mas and PT Andalan Sukses Makmur (out of PT GKG and PT GKS Assessment). However, the sufficiency statement from the RSPO GHG Unit towards the latest peat inventory submission is not available. Thus, the unit of certification is encouraged to monitor

the sufficiency of peat inventory report to the RSPO GHG Unit.

- On 29 March 2020, The CH sent an email to the RSPO GHG that based on an internal assessment conducted by the Research & Development of BGA on peat areas within the PT Agro Sejahtera Manunggal concession, would like to share the updated Peat inventory, along with the relevant shape files of the peat areas identified within it
- September 10, 2021, the company received an update on the peat area from the results of communication with the RSPO GHG to 846.02 Ha.

Based on description on showing that company has inventory, document, and report regions existing peat in managed area ( app \_ effective start November 15, 2018 ) to RSPO Secretariat

### 7.7.3

The company has 8 poles subsidence, that is there are 7 poles subside at PT. GKG (2 Poles in MUTE and 4 Poles in STHE) and 1 poles subside at PT. GKS (SJYE) as well has made poles subside the since 2016. The company has do measurement poles subside every month and based sample results measurement stake subside the years 2019-2022 are known that rate decline surface peat between -3.50 to with 4.84 cm/year. This is in accordance with the results of field observations in block I16 Division 3 STHE.

The results of field observations in block P23 Division 1 SJYE found that the subsidence markers had been coloured in their entirety so that they could no longer be used to measure the subsidence of peat subsidence. Based on the results of interviews with research staff of PT. BGA found that there was a misunderstanding of the work instructions to the employees so that the stakes were renewed by painting the subsidence stakes as a whole in block P23 SJYE so that the results of measuring the reduction in subsidence could no longer be known. The company has the opportunity to improve the measure of decreasing the subsidence bar according to the time the subsidence bar was first installed.

Based on the foregoing, the company has the opportunity to renew the subsidence stake in block P23 Division 1 SJYE so that it can be used again to measure the rate of subsidence of peat. **OFI**

### 7.7.4

The CH has measurement of water level and water table (Piezometer) every week at 8 Block namely Blocks F13 and G13 Division 2 MUTE, H14 Division 4 STHE, I16, J18, K17 and K19 Division 3 STHE and P23 Division 1 SJYE. Based on results weekly water level measurement in January 2023 it is known that the water level is located between 52 – 85 cm. Whereas based on results weekly water table (Piezometer) measurements in January 2023 it is known that the water level is located between 28 – 65 cm. The water level varies every week, this is due to differences in rainfall

Based on the data above, it shows that the condition of the peat subsurface water is still within the threshold of good management. In addition, the company maintains land cover conditions by cultivating *Nephrolepis Bisserata*, *Beneficial Plants*, soft weeds and selective weed control.

Based on the description above, it shows that the company already has evidence of the implementation of water management and land cover programs

### 7.7.5

Based on the area statement of PT. GKG and PT. GKS is known that the planting year is between 2007 and 2016. In addition, in the agronomic procedures related to replanting Number BGAAGRKS-SOP-17 it is known that replanting can begin after the plants are 25 years old, namely around 2032 so this indicator cannot be applied because there is no program replanting.

### 7.7.6

PT. GKS and PT. GKG has not planted new oil palms and since 2016. PT. GKS and PT. GKG has a conservation area of 75 Ha. PT. GKS and PT. GKG did not build infrastructure and open drainage in conservation areas. In addition, the company does not carry out plant maintenance, either fertilizer or chemist application, at a distance of 50 meters to the right and left along the river bank. The company has a water management program including maintaining the groundwater level and monitoring the subsidence of peat soils. Land subsidence markers are observed and measured once a month, piezometer measurements once a week and water level measurements once a week.

Based on the description above, it shows that all existing plantings on peatlands are managed in accordance with applicable laws

and regulations

**7.7.7**

PT. GKS and PT. GKG has not planted new oil palms and since 2016 PT. GKS and PT. GKG has a conservation area of 75 Ha. Based on field observations, the company has managed its operational areas well, including maintaining conservation areas, selectively controlling weeds, reducing the use of pesticides and optimizing biological pest control, regularly monitoring the water level and subsidence of the peat surface

**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 *Dokumen Pengelolaan dan Pemantauan Lingkungan* (DPPL) in 2010 and documents on the identification of high conservation value areas in 2012.

Unit of certification also conducted regularly water quality testing every semester for Tengar River, Bakau River and Tapah River in PT Gunajaya Karya Gemilang as well as MB I River, MB II River, Kendawangan I River, Kendawangan II River, upstream Kediuk River dan upstream Kediuk River in PT Gunajaya Ketapang Sentosa which refer to the threshold set up in Government Regulation No. 22 of 2021 (Class II). Last water quality testing was conducted on 22-24 September 2022 by accredited laboratory No. LP-547-IDN. There are several parameters that pass the quality standard, namely pH, BOD and COD in Bakau River, MB I River, MB II River, Kendawangan I River, Kendawangan II River, upstream Kediuk River dan upstream Kediuk River. For the parameters that pass the quality standard, the management unit has evaluated, the pH, BOD and COD parameters are outside the quality standard this is due to conditions that allow the accumulation of water such as in low-lying areas or swamps which can increase the length of time the water stays and stagnates in the catchment area, as well as the discharge of domestic (organic) waste originating from settlements around the river causing chemical changes. This has been included in the study of *Dokumen Pengelolaan dan Pemantauan Lingkungan* (DPPL) in 2010.

Unit of certification also conducts groundwater quality testing. Results of groundwater quality analysis of PT Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa 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 KNDE, STHE, and BSRE 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 HCV Management No BGA-SUST-SOP-36-R00 dated 12 May 2018 which explains not to carry out chemical activities on riparian conservation areas (for planted areas). The marking of riparian areas is done by painting palm trees 50 m or 100 meters away with a standard 1-meter-high painting from the ground with orange paint so that they are easy to see and monitor.

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 on 8 August 2022 and to the community on 21 April 2022. Interviews with spraying and fertilizing workers in BHE, SWE, KBE, and SSE 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**

In liquid waste management, the company uses a Wastewater Treatment Plant (WWTP) which consists of 11 waste treatment ponds which will then be used as a substitute for fertilizer in the Land Application (LA). The pool area has an area of 33,979 m<sup>2</sup> with a total volume of liquid waste that can be accommodated of 328,514 m<sup>3</sup>. The company already has a Land Application (LA) Permit in the form of a Permit to Utilize Wastewater from the Palm Oil Industry on land in an oil palm plantation to PT Gunajaya Karya Gemilang covering an area of 325 Ha, located in Kendawangan Sub District, Ketapang District with Number 476 / DPMPTSP-D / 2020. This permit will take effect as of 18 December 2020 and is valid for 5 years. The permit also revoked the previous liquid waste utilization permit (Number 862 / KLH-B / 2015). The permit also explains which locations are the 34 blocks for application land and 1 block of study land.

The company can show documents regarding the results of the measurement of the quality of liquid waste (POME), namely the Liquid Waste (POME) Report per quarter and the RKL-RPL Implementation Report per semester which includes the results of the measurement of the quality of liquid waste every month. The test is carried out by a laboratory that has been accredited by KAN (LP-966-IDN) with reference to the KepmenLH regulation Number 29 of 2003.

Monitoring the quality of wastewater at the outlet shows the results. Parameters monitored meet environmental quality standards. From the results of the Quarter 3 data analysis in 2021, there has never been a test result value that is above the specified quality standard. This shows that the liquid waste generated from FFB management activities is feasible to be applied to land (Land Application).

All palm oil mill effluent produced by Kendawangan 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 Public Housing, Settlement Area, and Environmental Agency of Ketapang 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-966-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 476/DPMPTSP-D/2020 regarding permit for use of palm oil industrial wastewater on the oil palm plantation land of PT Gunajaya Karya Gemilang. The application area of 325 ha is in Kendawangan Estate blocks J39a, H30a, H31a, H33a, H33b, H24a, I29a, I30a, J35a, J36a, J37a, J40a, K37a, K38a, K39a, G33a, G33b, G34a, G35a, dan G36a, H29a. H31b, H35a, H36a, I26b, I27d, I28a, I28b, I28c, I28d, K38c, and J38a, as well as in Sungai Tapah Estate blocks H26a, H27a, H28a. This permit is issued on 28 November 2019 and valid for five years.

**7.8.4**

Unit of certification already has a Surface Water Utilization Permit for PT Gunajaya Karya Gemilang unit based on Decree of Minister of Public Works and Public Housing Number PR0104/BWS9/256 on 1 April 2020 and is valid for 5 years. In the document there is a provision for a quota of surface water intake of 31,389 m<sup>3</sup>/month. 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 22,575 m<sup>3</sup>/month while the total water use is 270,901 m<sup>3</sup>/month. Based on these data, the use of water is in accordance with provision in its permit.

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 on 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 110,447 kWh of electricity from turbine. Renewable energy use per ton of palm product in the mill is 27.16 kwh/ton FFB processed. Result direct fossil fuel used is 3.34 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 Kendawangan 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 Kendawangan POM and its supply base for period of January-December 2022 are listed as follows:

Summary Emission

Emission per product	tCO2e/tProduct
CPO	1.01
PK	1.01

Production	t/yr
FFB processed	415,510.06
CPO produced	94667,65
PK produced	19767,28

Extraction	%
OER	22.78
KER	4.76

Land use	Ha
Planted area	17229.76
Planted on peat	846.02
Conservation Area Forested	0.00

Conservation Area Non Forested	75.00
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**Summary of field emission and Sinks**

Description	Own		Group		3rd Party		Total
	tCO2e/ha	tCO2e/t FFB	tCO2e/ha	tCO2e/t FFB	tCO2e/ha	tCO2e/t FFB	
Emission Source							
Land Conversion	5.50	0.28	0.00	0.00	0.20	0.00	100897.88
CO2 Emissions from Fertilizer	1.61	0.08	0.00	0.00	0.05	0.00	27722.37
N2O Emissions from Peat	0.51	0.03	0.00	0.00	0.00	0.00	5987.63
N2O Emissions from Fertilizer	0.84	0.04	0.00	0.00	0.02	0.00	14079.81
Fuel Consumption	0.28	0.01	0.00	0.00	0.02	0.00	6340.33
Peat Oxidation	3.75	0.19	0.00	0.00	0.00	0.00	43672.90
Sinks							
Crop Sequestration	-9.36	-0.47	0.00	0.00	-0.33	0.00	-169819.24
Sequestration in Conservation Area	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	3.13	0.16	0.00	0.00	-0.04	0.00	34062.81

**Summary Oil Mill Emissions and Credits**

Description	tCO2	tCO2e/t FFB
Emissions sources		
POME	81447.01	0.20
Fuel consumption	429.99	0.00
Grid electricity	0.00	0.00
Credits		
Export of grid electricity	-7.92	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	81869.08	0.20

**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

Based on data above, it is known that unit of certification has reduced GHG emission from the previous assessment. GHG emission from previous assessment is 2.00 tCO2e/tProduct while GHG emission from data above is 1.01 tCO2e/tProduct. Based on this

explanation, unit of certification has identified and assessed GHG emissions.

**7.10.2**

Unit of certification did not carry out new developments after 2014, but unit of certification continues to manage GHG by conducting an inventory of emission sources. They can show identification documents of activities that generate emissions for the period 2022 for Mills and Plantations. This is done to estimate carbon stocks in the management area along with potential sources of emissions that can occur directly as a result of the management, and a plan to minimize these emissions is drawn up and implemented.

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 SOP Greenhouse Gas Inventory No. The BGA-SOP-CCS-1107-year 2012. 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 Public Housing, Settlement Areas and Environmental Agency of Ketapang Regency on 31 January 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-195-IDN) on 04-15 March 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-547-IDN) on 23-24 September 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**

Unit of certification does not carry out new plantings or replanting by burning as evidenced by a Cooperation Agreement with the contractor, for example:

- Cooperation Agreement Letter No. 042-LC/GKGL-KNDE/JKT/XII/2011 dated December 26, 2011 between PT GKG and PT Hamparan Rimba Mas, the contents of the agreement related to the development of a 50 ha land in Kendawangan Estate PT GKG using heavy equipment.
- Cooperation Agreement Letter No.041-LC/GKSL-BSRE/JKT/XII/2011 dated December 26, 2011 between PT GKS and CV Karya Tani Unggul, the contents of the agreement related to the agreement for swamp stacking work, ditch maintenance and harvesting path in the Banjar Sari Estate area (BSRE) PT GKS using heavy equipment.

In addition, based on the results of interviews with Public Housing, Settlement Areas and Environmental Agency of Ketapang Regency, there were no issues related to land clearing or replanting by burning in the unit of certification. Based on the results of field observations in the KNDE, STHE, BSRE, SJYE and Rimba Sari Plasma, information was obtained that there were no signs of land clearing by burning. All land clearing activities used mechanical.

**7.11.2**

Unit of certification has a no-burn policy contained in the Policy on Environment and Biodiversity and was approved by the Regional Head on June 1, 2016, which states that BGA in running its business is committed to land clearing implementing a zero-burning system (no burning) in all development activities estate and waste disposal. The company also has SOPs on fire prevention:

- SOP for Fire Management and Prevention (BGA-WNA-KRD/PRO-19/03/2012) was approved on 21 March 2012 by the Area Controller 3. Emergency response conditions identified include: fire, explosion, pollution, natural disaster, civil commotion violence, demonstrations, and work accidents. Broadly speaking, the SOP contains fire prevention procedures (with APAR, Hydrant), fire prevention, coordination, communication, training and socialization processes.
- The Work Instruction for Land Fire Management and Prevention (BGA-WNA-KRD/IK-20/03/2012) was ratified on March 21, 2012 by the Area Controller 3. The procedure describes land fire prevention, formation of a firefighting team, land fire prevention, and activities after the blackout.

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 December 2022. 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 Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa on 27 January 2023 and 10 December 2022. Then the unit of certification has also made a joint agreement regarding land burning activities as described in indicator 7.11.3.

**7.11.3**

Unit of certification has involved stakeholders at the border locations of the operational area to prevent and control fires through simulations and socialization of firefighters, which were attended by the surrounding community and several agencies around the unit of certification. Unit of certification has demonstrated evidence of stakeholder involvement in fire prevention and control, as shown below:

- Minutes of fire drill simulation on 10 December 2022 which was attended by 15 participants including representatives of villages around PT Gunajaya Ketapang Sentosa and the firefighting team.
- Minutes of fire drill simulation on 27 January 2023 which was attended by 9 participants including representatives of villages around PT Gunajaya Karya Gemilang and the firefighting team.

Based on result of interview with Public Housing, Settlement Areas and Environmental Agency of Ketapang Regency, it is known that company already has adequate fire prevention and control facilities and infrastructure, in addition there is no history of fire incidents in the company's concession area within the last 1 year. Based on result of interview with representatives of Kendawangan Kiri Village, Seriam Village, Banjarsari Village, and Mekar Utama Village, it is also known that there is no issue of land fires caused by the unit of certification inside the unit of certification's area.

**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**

Based on the DPPL document in 2010 and based on the Minister of Forestry Decree No. 296 / KPTS-II / 2000 on forest and marine area guidelines for the province of West Kalimantan, the location of the plantation is currently included in other use areas dominated by a relatively flat topography (58.36%). The company's current operational area was formerly a logging area since 1980 and is a swamp secondary forest with low plant density.

Unit of certification has conducting land clearing without HCV assessment; thus remediation and compensation procedure has been applied to PT GKG. In the previous assessment, it was explained that PT GKG has conducting HCV assessment for area covers about 10,009.99 ha in April 2011. On 29 January 2018, Bumitama Agri Ltd had sent a liability disclosure and LUCA for PT GKG and PT GKS to the RSPO Compensation Plan and it has declared Pass.

Based on the results of document verification, PT Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa has started planting since 2007. HCV Identification activity was carried out by unit of certification (including Rimba Sari Plasma) is in 2012. BGA Group,

the parent of PT Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa, has made a disclosure of liability to RSPO. Result if verification shows that there are 3 documents as shows below:

- LUC Analysis Verification Result Document for PT Gunajaya Karya Gemilang which has been covered 7,261.89 ha which has been endorsed by RSPO on 9 March 2016. Total area for conservation liability is 372.61 ha.
- LUC Analysis Verification Result Document for PT Gunajaya Ketapang Sentosa which has been covered 7,666 ha which has been endorsed by RSPO on 9 March 2016. Total area for conservation liability is 618.46 ha.
- LUC Analysis Report for PT Gunajaya Ketapang Sentosa which has been covered 2,427 ha which has been endorsed by RSPO on 3 February 2020. Total area for final conservation liability is 0 ha and remediation responsibility are 176.31 ha. This has been included Rimba Sari Plasma area.

#### **7.12.2**

The first planting year was carried out in 2007. Based on the verification of land clearing data there was no indication of any new land clearing after 15 November 2018, therefore the company 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:

- Final Report on Identification and Analysis of Existence of High Conservation Values (HCV) in Permit Area of PT Gunajaya Karya Gemilang on 27 August 2012. The study was conducted by Faculty of Forestry IPB using reference to 2008 HCV toolkit, with field data collection dates on 13-15 March 2011. This study covered area of 10,009.99 ha of PT Gunajaya Karya Gemilang. Based on the results of identification, area of 114.70 Ha of HCV was obtained. Based on result of study, the unit of certification conducted public consultation on HCV on 14 April 2011 which was attended by 24 participants who were company representatives, and on 13-15 March 2011 which was attended by 59 participants who were representatives of the surrounding village community and representatives of the sub-district. Peer review conducted by Dr. Kunkun Jaka Gurmaya on 27 August 2012.
- Final Report on Identification and Analysis of Existence of High Conservation Values (HCV) in Permit Area of PT Gunajaya Ketapang Sentosa on 27 August 2012. The study was conducted by Faculty of Forestry IPB using reference to 2008 HCV toolkit, with field data collection dates on 16-17 March 2011. This study covered area of 10,068.56 ha of PT Gunajaya Ketapang Sentosa. Based on the results of identification, area of 19,56 Ha of HCV was obtained. Based on result of study, the unit of certification conducted public consultation on HCV on 14 April 2011 which was attended by 15 participants who were company representatives, and on 16 April 2011 which was attended by 12 participants who were representatives of the surrounding village community and representatives of the sub-district. Peer review conducted by Dr. Kunkun Jaka Gurmaya on 27 August 2012.

Based on result of document review, there is difference in area between the HCV study results in 2012 and High Conservation Value Area Map documents of PT Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa 2023. Based on the results of verification and interviews with management, information was obtained that this was due to the HCV area being included in the scope of the assessment, namely area of 60 Ha from PT Gunajaya Karya Gemilang and 15 Ha from PT Gunajaya Ketapang Sentosa. 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 it is not set HFCL for Indonesia.

#### **7.12.4**

There was no change in the study of the HCV identification document in 2012, both the scope of the study and the company's operational activities remained the same, as explained in the recertification assessment. For the activities, the scope of certification of PT Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa has a total HCV area of 75 Ha. 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 2021 is carried out in accordance with the 2021 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 KNDE employees on 13 January 2023 which was attended by 42 employee representatives.
- Socialization of the HCV area to MSJE employees on 05 August 2023 which was attended by 29 employee representatives.
- Socialization of the HCV area to Banjarsari Village on 09 August 2022 which was attended by 17 employee representatives.
- Availability of documents for maintaining HCV KNDE 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.

#### **7.12.5**

Unit of certification has also considered various land tenure and management options to protect HCV management areas to protect the rights and livelihoods of local communities. Unit of certification showed the results of the memorandum of understanding meeting on the management of the HCV area on April 13, 2021, which was attended to and agreed upon by the residents of Banjarsari and Mekar Utama villages. The villagers' decisions do not damage areas with cultural and traditional values. They do not damage sites that provide basic needs such as rivers for fishing and protecting springs.

#### **7.12.6**

Unit of certification has demonstrated the company policy regarding the protection of high conservation values and established procedures contained in SOP BGA-SUST-SOP-36 R-00 as of May 12, 2018. The document states that in accordance with the company's sustainability principles, all employees are encouraged not hunting, catching, killing and selling endangered animals and plants which are protected and reporting when these activities are found, maintaining and not disturbing areas designated as HCV areas, reporting any illegal actions. Employees who do not comply will be subject to sanctions in accordance with applicable laws and regulations.

Several steps have been taken by PT Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa to protect areas that have been identified as HCV areas, including:

- Planning for species enrichment in river border areas
- Installing notice boards regarding prohibitions against cutting trees, hunting, and poisoning fish
- Put up animal posters in the PT Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa areas
- Disseminate the HCV area and animals in the PT Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa areas
- Installing a fence in the cemetery area.

Unit of certification has been conducting regular patrols, security is responsible for carrying out daily patrols. In addition, there is also monitoring that is carried out every month by the foreman and a patrol report is prepared by Sustainability. If there is poaching and disturbance of the HCV area, then action will be taken in the form of sanctions and legal action.

Unit of certification has also conducted socialization about the existence of rare plants and animals to all employees and the surrounding community, as shown in the minutes, for example, the minutes of 13 January 2023 and 05 August 2022, which KNDE and MSJE employees attended. All activities can be proven by photos and attendance lists attached to the document. Indirect socialization is also carried out by installing information boards and brochures warning signs related to conservation areas and the presence of protected rare plants and animals in places that are easily visible, such as area entrances, regional roads that are often crossed by the community, and other sites other strategic areas such as offices, and other public facilities.

Based on interviews with management units and company employees regarding animal protection, the company has committed to protecting animals within the scope of corporate governance, such as implementing a ban on hunting, killing, and keeping wild animals within the company's environment. The procedure for animal protection also regulates the existence of sanctions for those who violate these provisions.

#### **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 unit of certification

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 Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa have 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.

The 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 on 28 January 2023, 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.

**7.12.8**

Unit of certification shows evidence of communication with the RSPO regarding the LUCA as shown in 7.12.1. Then, unit of certification has also shown progress of Compensation Plan review based on an email on 9 January 2023 from RSPO which stated that, " *Bumitama has achieved a Satisfactory evaluation result, Henceforth, the RaCP process for Bumitama are now completed and you may proceed with certification.*" Based on these email, PT Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa LUCA and Compensation Plan status was declared Satisfactory by RSPO with total compensation liability of 372.61 ha for PT Gunajaya Karya Gemilang and 618.46 ha for PT Gunajaya Ketapang Sentosa. Besides, there is remediation responsibility 176.31 ha for Plasma. Until this assessment, company did not conduct new land clearing activities or development of operational areas.

<b>Status: Comply</b>	
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**3.2 Conformity Checklist of Certificate and Trademark Use**

<b>1.</b>	<b>Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client</b>	<b>X or √</b>
<b>ASA-1.1</b>	Certificate holder were not use the certificate and trademark whether on-product or off-product	√
	<b>Status: Comply</b>	
<b>2.</b>	<b>Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use</b>	<b>X or √</b>
<b>ASA-1.1</b>	Certificate holder were not use the certificate and trademark whether on-product or off-product	√
	<b>Status: Comply</b>	
<b>3.</b>	<b>Implementation of Certificate and Trademark is not used on product</b>	<b>X or √</b>
<b>ASA-1.1</b>	Certificate holder were not use the certificate and trademark whether on-product or off-product	√
	<b>Status: Comply</b>	
<b>4.</b>	<b>Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.</b>	<b>X or √</b>
<b>ASA-1.1</b>	Certificate holder were not use the certificate and trademark whether on-product or off-product	√
	<b>Status: Comply</b>	

**3.3 Summary of RSPO Partial Certification.**

Compliance of the uncertified management units of Bumitama Agri, Ltd against the rules for partial certification was determined through Self-Assessment in accordance with RSPO Certification System clause 5.5.3. A summary of findings is as stated below.

Bumitama Agri, Ltd Time Bound Plan is explained in table 1.10. Bumitama Agri, Ltd has informed the Time Bound Plan progress, MUTU has considered that MP Bumitama Agri, Ltd is complied with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by Bumitama Agri, Ltd on 10 February 2023.

MUTU has verified partial certification for un-certified unit’s subsidiary of Bumitama Agri, Ltd based on their Time Bound Plan. There are nine (9) uncertified mills and thirty two (32) uncertified estates management units of Bumitama Agri, Ltd. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There is no significant land conflicts which have not been declared above
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labour disputes that are not being resolved through an agreed process
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above
- The company has revised several certifications plans for units that have not been certified in the period 2023 to 2025.
- For the majority of smallholder schemes, there are still problems related to land legality and RaCP approval (eg KUD Rangkong Bertuah, KUD Rasau Tiga Bersama and Koperasi Binasari).

<b>Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Based on the document review, there is a company internal audit that was conducted and the positive assurance is at this table that is also been verified.
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)	<p><b>PT Langgeng Muara Makmur Sejahtera</b></p> <ul style="list-style-type: none"> <li>- RaCP Plan document are wait for LUCA documents to be submitted and approved by RSPO.</li> <li>- HCV conducted March 2012 by Forestry IPB.</li> </ul> <p><b>PT Andalan Sukses Makmur</b></p> <ul style="list-style-type: none"> <li>- LUCA was sent on January 2015 to RSPO</li> <li>- Documents RaCP Plan are wait for LUCA approved by RSPO</li> <li>- HCV was conducted on October 2013 by Sonokeling Akreditasi Nusantara</li> </ul> <p><b>PT Investa Karya Bhakti</b></p> <ul style="list-style-type: none"> <li>- LUCA was sent on 13 June 2016 to RSPO</li> <li>- Documents RaCP Plan are wait for LUCA approved by RSPO</li> </ul> <p><b>PT Gunajaya Harapan Lestari</b></p> <ul style="list-style-type: none"> <li>- LUCA has not been submitted to RSPO</li> <li>- HCV was conducted on October 2012 by Forestry IPB</li> </ul> <p><b>PT Windu Nabatindo Sejahtera</b></p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> <li>- LUCA was sent on 19 June 2016 to RSPO</li> <li>- Documents RaCP Plan are wait for LUCA approved by RSPO</li> <li>- HCV was conducted on March 2012 by Forestry IPB</li> </ul> <p><b>PT Ladang Sawit Mas</b></p> <ul style="list-style-type: none"> <li>- LUCA was sent on 16 July 2014 to RSPO</li> <li>- Documents RaCP Plan are wait for LUCA approved by RSPO</li> <li>- HCV was conducted on December 2013 by Sonokeling Akreditasi Nusantara</li> </ul> <p><b>PT Lestari Gemilang Intisawit</b></p> <ul style="list-style-type: none"> <li>- LUCA was sent on 7 November 2014 to RSPO</li> <li>- Documents RaCP Plan are wait for LUCA approved by RSPO</li> <li>- HCV was conducted on 2013 by Sonokeling Akreditasi Nusantara</li> </ul> <p><b>PT Agro Manunggal Sawitindo</b></p> <ul style="list-style-type: none"> <li>- LUCA was sent on 7 November 2014 to RSPO</li> <li>- Documents RaCP Plan are wait for LUCA approved by RSPO</li> <li>- HCV was conducted on July 2013 by Sonokeling Akreditasi Nusantara</li> </ul> <p><b>PT Karya Makmur Langgeng</b></p> <ul style="list-style-type: none"> <li>- LUCA was sent on January 2015 to RSPO</li> <li>- Documents RaCP Plan are wait for LUCA approved by RSPO</li> <li>- HCV was conducted on July 2013 by Sonokeling Akreditasi Nusantara</li> </ul> <p><b>PT Gemilang Makmur Subur</b></p> <ul style="list-style-type: none"> <li>- HCV was conducted on November 2016 by PT Gagas Dinamika Aksenta.</li> </ul> <p><i>Auditor verification</i> Based on internal audit results and evidence provided (communication to RSPO on liability disclosure) shows that all subsidiaries of Bumitama has been sent to RSPO and now on progress of LUCA review.</p>
2.1.3	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<p><b>PT Langgeng Muara Makmur Sejahtera</b>, there is no new planting after January 1<sup>st</sup> 2010.</p> <p><b>PT Andalan Sukses Makmur</b>, NPP was completed for areal 5,630 Ha and publish on March 10th 2016.</p> <p><b>PT Investa Karya Bhakti</b>, NPP was completed for areal 5,700 Ha and publish on October 4th 2016.</p> <p><b>PT Gunajaya Harapan Lestari</b>, there is no new planting after January 1<sup>st</sup> 2010.</p> <p><b>PT Windu Nabatindo Sejahtera</b>, there is no new planting after January 1<sup>st</sup> 2010.</p>



Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p><i>Auditor verification</i></p> <p>Based on internal audit, documented time of land clearing and liability disclosure sent to RSPO, there is new planting/land clearing after 1<sup>st</sup> January 2010 for PT Andalan Sukses Makmur and PT Investa Karya Bhakti but NPP has been conducted for these units. Evidence of submission to RSPO is provided and the NPP notification are at RSPO website.</p>
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p>There is no land conflicts.</p> <p><i>Auditor verification</i></p> <p>There is land conflicts and has been resolved with RSPO Grievance procedure or Dispute Settlement Facility.</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p>There is labor disputes. There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p><i>Auditor verification</i></p> <p>There is labour dispute in uncertified unit i.e PT Bumitama Gunajaya Abadi. The dispute has been resolved as we can seen in RSPO website that the status of dispute in closed for monitoring.</p>
2.1.6	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1 (it has changed be Criterion 4.2 in P&C 2018).	<p><b>PT Langgeng Muara Makmur Sejahtera</b></p> <ul style="list-style-type: none"> <li>Izin Prinsip Arahan Lokasi No. 525.21/660/Ek.SDA/IX/2014 dated 12 September 2014 5,325 Ha</li> <li>Location Permit SK Dictrict Kotawaringin Timur No. 188.45/330/Huk-BPN/2014, 23 September 2014 5,370 Ha</li> <li>Environment Permit No. 660/2140/BLH-Ek.SDA/2015, 19 October 2015 for 5,325 Ha</li> <li>IUP No. 188.45/490/Huk-Ek.SDA/2014, 19 December 2014 4,810.72 Ha</li> <li>SK HGU No. 5/HGU/KEM-ATR/BPN/2017, January 10th 2017.</li> </ul> <p><b>PT Andalan Sukses Makmur</b></p> <ul style="list-style-type: none"> <li>Izin Prinsip Arahan Lokasi SK Dictrict Kotawaringin Barat No.590/105/Pem-XI/2012, November 21 2012 for areal 9,000 Ha.</li> <li>Location Permit SK Dictrict Kotawaringin Barat No.525/68/XII/2012, December 18th 2012 for 9,275 Ha</li> <li>IUP No. 525/45/ek, 06 February 2013</li> <li>HGU on process.</li> </ul> <p><b>PT Investa Karya Bhakti</b></p> <ul style="list-style-type: none"> <li>Izin Prinsip Arahan Lokasi No. 590/09.Pem-II/2014, 3rd February 2014 for areal 14,500 Ha.</li> <li>Location Permit SK Dictrict Kotawaringin Barat No. 525/62/IX/2014, 1st September 2014, 11,746.74 Ha</li> <li>IUP No. 525/014/EK, April 21 2015, 5,700 Ha</li> </ul> <p><b>PT Rohul Sawit Industri and PT Masuba Citra Mandiri</b></p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> <li>• HGU on process</li> <li>• Panitia B Inti No. 03/RSL/HGU/2015 seluas 1,893.11 Ha</li> <li>• Panitia B Plasma No. 04/RSL/HGU/2015 seluas 938,16 Ha</li> </ul> <p><b>PT Gunajaya Harapan Lestari</b></p> <ul style="list-style-type: none"> <li>• Izin Prinsip Arahan Lokasi No. 525/426/Bappeda-D year of 2007, 08 May 2007 for areal 3,000 Ha.</li> <li>• Location Permit SK District Kendawangan No. 265 year of 2007, 28 June 2007 for 3,000 Ha</li> <li>• Revision Location Permit No. 370 year of 2008, 07 October 2008 for 3,000 Ha</li> <li>• Extention Location Permit No. 415 year of 2010, 27 July 2010 for 3,000 Ha</li> <li>• IUP No. 365/DISBUN-D/2012, August 23rd 2012 for 1,750 Ha</li> <li>• HGU No. 62/HGU/KEM-ATR/BPN/2016, 1,973.45 Ha</li> </ul> <p><b>PT Windu Nabatindo Sejahtera</b></p> <ul style="list-style-type: none"> <li>• Izin Prinsip Arahan Lokasi No. 02.04.28/525.26/463/XI/Ekbang/03, 8th November 2003 for areal 7,000 Ha.</li> <li>• Location Permit SK District Kotawaringin Timur No. 165.460.42, 26 February 2004 for 5,370 Ha</li> <li>• IUP No. 525.26/152/V/Ekbang/2004, 17 May 2004 for 5,370 Ha</li> <li>• Permit Location No. 374.460.42, December 13 2006 for 5,000 Ha (Revision)</li> <li>• IUP No. 525.26/386/V/Ekbang/2007, May 30th 2007 for areal 5,000 Ha (Revision)</li> <li>• Kadastral Map No. 355-15.05-2007, July 6th 2007 for areal 4,998.76 Ha</li> <li>• Surat Permohonan HGU 003/WNS-Dir/VII/2007, July 11th 2007 for areal 5,000 Ha.</li> </ul> <p><b>PT Windu Nabatindo Abadi</b></p> <ul style="list-style-type: none"> <li>• Sertifikat HGU No. 37/HGU/BPN RI/2014 seluas 1,987.8 Ha</li> <li>• Sertifikat HGU No. 48/HGU/KEM-ATR/BPN/2015 tanggal 20 Mei 2015 seluas 5.773 Ha</li> </ul> <p><b>PT Nabatindo Karya Utama</b></p> <ul style="list-style-type: none"> <li>• Sertifikat HGU No. 17/HGU/KEM-ATR/BPN/2016 tanggal 07 April 2016 seluas 3,298.63 Ha</li> </ul> <p>HGU on process for Ladang Sawit Mas, PT Lestari Gemilang Intisawit, PT Agro Manunggal Sawitindo, PT Karya Makmur Langgeng, and PT Gemilang Makmur Subur</p> <p><i>Auditor verification</i> Land legal process is still going on and there is a detail update progress documented by the company for each year.</p>

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

**3.4.1. Identification of Findings, Corrective Actions and Observations at Re-Certification Assessment (Remote Audit)**

<b>NCR No.</b>	: 2021.01	<b>Issued by</b>	: Mohamad Amarullah
<b>Date Issued</b>	: 15 January 2021	<b>Time Limit</b>	: Next ASA
<b>NC Grade</b>	: Major	<b>Date of Closing</b>	: 11 February 2023 (ASA-1.1)
<b>Standard Ref. &amp; Requirement</b>	: 7.12.8 Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCVHCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.		
<b>Evidence observed (filled by auditor):</b> Based on the RACP document endorsement in form of LUC analysis verification the result for PT GKG liability area is 883.51 ha multiplied by 0.7 so the conservation liability area is 618.46 ha and PT GKS liability is 532.30 ha multiplied by 0.7 so the conservation liability (liability compensation) is 372.61 ha.  Bumitama Agri Ltd has submitted Liability Disclosure and LUCA for PT GKG & PT GKS to RSPO Compensation Plan January 29 2018 and declared <b>PASS</b> .  Unit of certification has shows communication evidence between RSPO and BGA management through email dated 16 July 2020 which explained that RSPO has giving conditional approval to the latter regarding RaCP process of PT GKG and PT GKS, this matter will be verified during the next assessment. Process of RaCP evaluation takes about 2-3 weeks and up to audit re-certification assessment, there is no such progress evidence.			
<b>Non-Conformance Description (filled by auditor):</b> However, until the RC audit, there was no evidence the RAC-Plan for PT GKG & PT GKS had been approved by the RSPO.			
<b>Root Cause Analysis (filled by organization audited):</b> The long review process from the HCV Compensation Panel related to the approval of the HCV Compensation Panel PT GKG and PT GKS.			
<b>Correction (filled by organization audited):</b> Submit a proposal for delaying the time limit for repairs related to indicator 7.12.8 (approval from the HCV Compensation Panel) to the RSPO Secretariat.			
<b>Corrective Action (filled by organization audited):</b> Conduct intensive communication with the HCV Panel compensation so immediately approve the HCV Compensation Plan of PT GKG and PT GKS.			
<b>Assessor Evaluation and Conclusion (filled by auditor):</b> <b>Verification 30 March 2021</b> Unit of certification shows evidence of communication process with RSPO through email dated 22 March 2021 and 26 March 2021 which asking about RAC Plan approval progress and conditional approval, thus the company could be able to continue the audit process. This email had responded on the same date and RSPO mentioned that CB should get in touch with RSPO Assurance Department on this matter.  As continues response, the CB through LA RSPO has deliver email to RSPO Assurance Department on 30 March			

2021, to inquire about RAC plan approval progress of PT GKG and PT GKS. Furthermore, RSPO respond on the same date and informed that internal checking on issue raised up will be conducted immediately and revert to CB for any clarification needed. Thus, this NCR is still remain **open**.

**Verification 13 April 2021**

- Unit certification sent email to RSPO Assurance Department which asking about conditional approval for closure the NCR is ASA-1.1 for PT GKG/PT GKS RAC Plan. The email immediately responded by Compliance Deputy Director which stated that most cases clarification status are waiting for Bumitama to submit the compensation plan. Furthermore, from RSPO Integrity Unit perspective, prior issuing Advisory Note further, Bumitama should respond to the RSPO Compensation Team feedback with the Compensation Plan submission for further review. By then, RSPO will consider issuing the Advisory Note afterward.
- Unit of certification clarify RSPO respond which reaffirmed that Bumitama compensation plan has been submitted several years ago and is under review by the RSPO appointed evaluator. Due to certain issues in the evaluation process, the Compensation panel decided to conditionally approve this CP in an email dated 16 July 2020, to allow for certification "with the condition that the Compensation Plan must be reviewed as Satisfactory by the next Surveillance audit. The decision on this conditional approval is applicable for the following management units:" ... followed by a table of units included in this CP, including PT GKG and PT GKS. Bumitama has been assigned new evaluator for its CP and have immediately started with necessary revisions to address the comments posted by the evaluator. Subsequent rounds of review requested for further revisions that required on-site assessments to establish baselines for the activities under this CP. Bumitama last response to Secretariat on this matter was on 18 November 2020 after which have began with the preparation for the necessary updates. The data collection has been delayed by the pandemic situation, however Bumitama is now in the process of finalising the document to share with the RSPO. With the consideration for the Conditional approval granted by the CP and the timeline of this outstanding NCR, Bumitama is request for issuing the Advisory note for the ASA of PT GKG and PT GKS.

Based on the story of communication above, it could be concluded that unit of certification has delayed in responding RSPO compensation team feedback, due to pandemic situation. Thereby, RSPO is not be able to issuing advisory note of conditional approval. Thus, this NCR is still remain **open**.

**Verification 14 April 2021**

- RSPO Assurance Department respond unit of certification email dated 13 April 2021 which stated that RSPO has acknowledged all the efforts made by Bumitama to follow processes, and also unprecedented situation of pandemic that makes everyone stuck, including consideration of the previous Condition Approval made by the RSPO Secretariat to Bumitama in July 2020. Furthermore, RSPO also stated that it was difficult to make any further approval if RSPO is have not received progress in terms of any files or action from Bumitama to the RSPO RaCP team, since November 2020 (near 5 months) as per last communication made. Thus, RSPO suggest that Bumitama to submit whatever it is required by the RSPO Compensation team as soon as possible. By then, RSPO will review it first and will put in for consideration whether it is a good time for issuing another condition approval.
- Unit of certification has respond the above email on the same date which stated that while finalising the necessary documentation for continuation of Bumitama CP review process, unit share the HCS Checklist, which was requested as a precondition of approval of compensation projects based on HCS set-asides. All questions have been answered with YES.

Based on the story above, the process is still ongoing. Thus, this NCR is still remain **open**.

**Verification 15 April 2021**

RSPO stated that unit of certification has received the follow-up of the request of RSPO Compensation team in November 2020 and with consideration of several key aspects including the current situation, RSPO Secretariat agrees has to allow another **Conditional Approval** for the two mentioned certification units i.e.: PT GKG and PT GKS:

1. The Non-Conformity raised for this P&C requirement issued by PT Mutuagung Lestari to the units of certification is to remain Open with maximum timeline up to **14 October 2021**, which is 6 months from the date of this email.
2. The Certification Units SHALL proactively provide a response in a timely manner to the Compensation Panel review, which if there is future clarification it shall not to be delayed more than 2 months from the last review/comments received from the RSPO Secretariat.

The RSPO Secretariat will from time to time monitor this progress through the Integrity Unit of Assurance team and Compensation team. PT Mutuagung Lestari should provide any feedback or update that they may have in relation to the conditions stipulated above to the RSPO Secretariat. Furthermore, The RSPO Secretariat has a right to revoke this decision of conditional approval for Bumitama if it is deemed that any breach is happening towards the RSPO Standards, Systems, Procedure and/or Requirements.

**Verification 04 December 2021**

Unit of certification shows record of communication with RSPO regarding Compensation Plan approval of PT GKG and PT GKS, summarized as follows:

- In 11 November 2021 Deputy Head of Corporate Secretary, Corporate Communication and Sustainability of BGA sent email to RSPO about delivery of compensation plan amended (revision 2) in line with last feedback provided. This email responded by Biodiversity Unit of RSPO on 12 November 2021 which informed that PIC on this matter has left RSPO and would be passed to Head of Integrity Unit of RSPO.
- In 19 November 2021, Deputy Head of Corporate Secretary, Corporate Communication and Sustainability of BGA sent email to the Head of Integrity Unit of RSPO, which asking the progress on compensation plan approval, such as review schedule, evaluator assigned, etc. this email responded on the same date which stated that RSPO is working closely and will update the progress accordingly. Since the PIC has resign from RSPO, the new PIC will looking back all the records on the system to obtain accurate information. The next communication will be get from @RSPO\_Compensation email to ensure records can be kept in a central place.
- Last communication recorded from BGA is shows through email to [rspocompensation@rspo.org](mailto:rspocompensation@rspo.org) in 25 November 2021 which asking about the progress of Compensation Plan, but not yet response from RSPO.

According to explanation above, it was known that the Compensation Plan Approval process is stil ongoing and not final decision has been stated by RSPO. Thus, this NCR is still remain **open**.

**Verification 18 February 2022**

The company shows proof of improvement in the form of an electronic conversation sent by the RSPO on 10 February 2022 with the following contents:

Dear Pak Martin,

First of all, thank you for being patient with us.

After reviewing your request and doing some internal checking, herewith our response to you.

We would only be giving the conditional approval for those Management Units that **have been certified before** to allow the Company to complete the RaCP process and continue the Annual Surveillance Assessment. And this will only be **valid until the next 6 months** from the date of this email. From time to time, we will review all the progress and status of the Certification and RaCP process for the certified management units, and we may revoke this conditional approval if anything happens that can heavily threaten the integrity of RSPO standard requirements.

While for the **uncertified management units**, The Initial Certification audit may be conducted, but the **Certificates can only be issued when the completion of the RaCP Process (i.e approval of Compensation and Remediation Plans) is approved** by the Compensation Panel.

The following, extracted from our Sales Force database (as per last week), is the list of all Management Units under your parent company with detailed status of Certification and RaCP process.



Management Unit (based on Remediation and Social Liability Per Management Unit page 11 - 44)	Short Form (3.2 Net Compensation Liability page 45)	Location (as per annex 8)	Mill Name (obtained from latest audit reports)	First Certification (based on the audit reports)	On-going RaCP
PT Agro Sejahtera Manunggal	<b>ASM</b>	Ketapang, West Kalimantan	Pembangunan Raya Mill (PT Agro Sejahtera Mandiri)	2019 and 2020	CP - Clarification
PT Gunajaya Karya Gemilang	<b>GKG</b>	Ketapang, West Kalimantan	Kendawangan Mill (PT Gunajaya Karya Gemilang)	2015	CP - Clarification
PT Gunajaya Ketapang Sentosa	<b>GKS</b>	Ketapang, West Kalimantan	Kendawangan Mill (PT Gunajaya Karya Gemilang)	2015	CP - Clarification
PT Karya Makmur Bahagia	<b>KMB</b>	Central Kalimantan	Gunung Makmur and Bukit Makmur (PT Karya Makmur Bahagia)	2014	CP - Clarification
PT Windu Nabatindo Lestari	<b>WNL</b>	Central Kalimantan	Katari Agro (PT Windu Nabatindo Lestari) and Pundu Nabatindo Mill	2014 and 2016	CP - Clarification
PT Windu Nabati Sejahtera	WNS	Central Kalimantan	Selucing Mill (PT Windu Nabatindo Sejahtera)	Not yet certified	CP - Clarification
PT Nabatindo Karya Utama	NKU	Central Kalimantan	Sungai Cempaga Mill (PT Windu Nabatindo Abadi)	Not yet certified	CP - Clarification
PT Masauba Citra Mandiri	<b>MCM</b>	Riau	SukaDamai (PT Rohul Sawit Industri)	2019	CP - Clarification
PT Karya Makmur Bahagia (Plasma)	KMB (Plasma)	Kotawaringin Barat, Central Kalimantan	Gunung Makmur and Bukit Makmur (PT Karya Makmur Bahagia)	Not yet certified	CP - Not Submitted
PT Windu Nabatindo Lestari (Plasma)	WNL (Plasma)	Ketapang, West Kalimantan	Katari Agro (PT Windu Nabatindo Lestari) and Pundu Nabatindo Mill	Not yet certified	CP - Not Submitted
PT Agro Manunggal Sawitindo	AMS	Ketapang, West Kalimantan	Bukit Tunggul Jaya Mill (PT Ladang Sawit Mas)	Not yet certified	CP - Not Submitted
PT Ladang Sawit Mas	<b>LSM</b>	Ketapang, West Kalimantan	Bukit Tunggul Jaya Mill (PT Ladang Sawit Mas)	2020	CP - Not Submitted

PT Lestari Gemilang Intisawit	LGI	Ketapang, West Kalimantan	Bukit Tunggul Jaya Mill (PT Ladang Sawit Mas)	Not yet certified	CP - Not Submitted
PT Gemilang Makmur Subur	GMS	Ketapang, West Kalimantan	Bukit Tunggul Jaya Mill (PT Ladang Sawit Mas)	Not yet certified	CP - Clarification
PT Sejahtera Sawit Lestari	SSL	Ketapang, West Kalimantan	Bukit Tunggul Jaya Mill (PT Ladang Sawit Mas)	Not yet certified	CP - Not Submitted
PT Karya Bakti Agro Sejahtera	KBAS	Ketapang, West Kalimantan	Sungai Rasau Mill (KBAS)	Not yet certified	CP - Clarification
PT Windu Nabatindo Abadi	WNA	Central Kalimantan	Sungai Cempaga Mill (PT Windu Nabatindo Abadi)	Not yet certified	CP - Clarification

*Note: CP here refers to Compensation and Remediation Plans*

**REMARKS:**

	Continue with Certification/Audit as long as the scope of certified area does not change
	May proceed to Initial Certification Audits with Concept Note submitted but certificate can be issued when RaCP is completed.
	Awaiting RSPO Management direction due to Resolution GA18-2d

Furthermore, if you found your **Time Bound Plan (TBP)** of your uncertified management units may not meeting the timeline, you may consider to submit a request for the revision of TBP following the flow process as refer to our recent announcement made in the RSPO website as following link: <https://www.rspo.org/news-and-events/announcements/rspo-announcement-for-time-bound-plan-revision>

There is an explanation and the flowchart on how to proceed for the approval request for the extension of time-bound plan. In general, if the new timebound / timeline is before 30th June 2023 (for those that have membership date before 1st July 2018), then you may not need to receive an approval from the RSPO Secretariat.

The key word is: *the TBP shall contain a current list of all estates and mills and as a minimum, all estates and mills shall be certified within five (5) years after obtaining RSPO membership. Any new acquisitions shall be certified within a three-year time frame. Any deviations from these maximum periods require approval by the RSPO Secretariat.* In this case, if your membership date is before 2018, so your time bound plan / timeline is maximum up to 30th June 2023. If above that, then you can request for the approval to extend the timeline. In another case, if you have any new acquisition, then it should be 3 years from the date of acquisition. If not, then you can make a request for approval to extend the time bound plan.

Based on evidence of non-conformance **Open Until Next ASA.**

**Verification at ASA-1.1 (11 February 2023)**

Unit of certification shows evidence of communication with the RSPO regarding the LUCA as shown in 7.12.1. Then, unit of certification has also shown progress of Compensation Plan review based on an email on 9 January 2023 from RSPO which stated that, " *Bumitama has achieved a Satisfactory evaluation result, Henceforth, the RaCP process for Bumitama are now completed and you may proceed with certification.*" Based on these email, PT

Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa LUCA and Compensation Plan status was declared Satisfactory by RSPO with total compensation liability of 372.61 ha for PT Gunajaya Karya Gemilang and 618.46 ha for PT Gunajaya Ketapang Sentosa. Until this assessment, company did not conduct new land clearing activities or development of operational areas. Therefore, this non-conformity stated **closed**.

**Verified by** : **Mohamad Amarullah / Erika Lucitawati**

**3.4.2 Identification of Findings, Corrective Actions and Observations at Re-Certification Assessment (Onsite Audit)**

<b>NCR No.</b>	: -	<b>Issued by</b>	: -
<b>Date Issued</b>	: -	<b>Time Limit</b>	: -
<b>NC Grade</b>	: -	<b>Date of Closing</b>	: -
<b>Standard Ref. &amp; Requirement</b>	: -		
<b>Evidence observed (filled by auditor):</b> -			
<b>Non-Conformance Description (filled by auditor):</b> -			
<b>Root Cause Analysis (filled by organization audited):</b> -			
<b>Correction (filled by organization audited):</b> -			
<b>Corrective Action (filled by organization audited):</b> -			
<b>Assessor Evaluation and Conclusion (filled by auditor):</b> -			
<b>Verified by</b>	: -		

**3.4.3 Identification of Findings, Corrective Actions and Observations at ASA-1.1 Assessment**

<b>NCR No.</b>	: 2023.01	<b>Issued by</b>	: Briyogi Shadiwa									
<b>Date Issued</b>	: 12 February 2023	<b>Time Limit</b>	: 13 May 2023									
<b>NC Grade</b>	: Major	<b>Date of Closing</b>	: 13 May 2023									
<b>Standard Ref. &amp; Requirement</b>	<b>3.8.7</b> <b>Purchasing and Goods in</b> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified volume. iii) The mill shall have a mechanism in place for handling of non-conforming FFB and/or document.											
<b>Evidence observed (filled by auditor):</b> <ul style="list-style-type: none"> <li>Based on the SOP for Product Identification &amp; Traceability (Doc.No.:BGA-SUST-SOP-44), it is known that the factory ensures the availability of FFB sources that are supplied to factories that are RSPO certified and those that are not RSPO certified.</li> <li>Based on the results of field observations at Sungai Tapah Estate and Kendawangan Estate, there are blocks that are outside the scope of certification, such as Block M24a (KNDE) and Block I19b (STHE).</li> <li>Based on a review of FFB receipts for the period February 2022 to January 2023, all FFB originating from Sungai Tapah Estate and Kendawangan Estate is RSPO Certified FFB.</li> <li>Based on verification of the Fruit Delivery Letter (SPB) document dated December 14<sup>th</sup>, 2022, it is known that FFB originating from non-certificates (Block I19a and Block I18b) was sent to Kendawangan Mill.</li> <li>Based on verification of mass balance records, CPO and PK production during the period February 2022 to January 2023 has exceeded the certified volume, along with the details: <table border="1" data-bbox="300 1119 1292 1245"> <thead> <tr> <th></th> <th>Last Year Projected Certified Volume (MT)</th> <th>Actual production in last 12 months (MT)</th> </tr> </thead> <tbody> <tr> <td>CPO Production</td> <td>52,900</td> <td>53,250.70</td> </tr> <tr> <td>Palm Kernel (PK) Production</td> <td>10,350</td> <td>11,151.39</td> </tr> </tbody> </table> </li> </ul>					Last Year Projected Certified Volume (MT)	Actual production in last 12 months (MT)	CPO Production	52,900	53,250.70	Palm Kernel (PK) Production	10,350	11,151.39
	Last Year Projected Certified Volume (MT)	Actual production in last 12 months (MT)										
CPO Production	52,900	53,250.70										
Palm Kernel (PK) Production	10,350	11,151.39										
<b>Non-Conformance Description (filled by auditor):</b> There is not enough evidence that the recording of certified and non-certified FFB sources is carried out thoroughly and notification to CBs regarding excess certified production.												
<b>Root Cause Analysis (filled by organization audited):</b> <ol style="list-style-type: none"> <li>Lack of knowledge from the PIC at the EHS Mill admin employee factory who is in charge of inputting daily production data (certificate and non-certificate)</li> <li>There is a new block number change</li> <li>There is no PIC at the mill to monitor certified production with a certificate quota</li> </ol>												
<b>Correction (filled by organization audited):</b> <ol style="list-style-type: none"> <li>Training for PICs is good at the factory, especially for employees who are new to the scales</li> <li>SCCS refresh training and socialization on the use of new block numbering in SPB</li> <li>Ensuring non-certified SPB is recorded according to its status (as non-certificate)</li> <li>Appoint EHS staff to monitor the recording of certified and non-certified SPB and in the event of excess production</li> <li>Reporting potential overproduction to the certification body</li> </ol>												
<b>Corrective Action (filled by organization audited):</b> Monitor and evaluate through internal audits and management review meetings												



**Assessor Evaluation and Conclusion** (filled by auditor):**Verification May 13, 2023.**

The auditee shows evidence of non-conformity correction in the following cases:

- Socialization and internal supply chain training on April 17, 2023, to related factory PICs (production admin, sustainability PIC, senior manager, etc.)
- Socialization and internal supply chain training on 14 April 2023 to the related PIC Kendawangan Estate (division head, section head, sustainability foreman, etc.)
- Record of SCCS internal training for production admins and KNDM scale cranes on 13 February 2023.
- Record of SPB dated 15 April 2023 which contains information that FFB from block M24a Kendawangan Estate is FFB that is not RSPO certified.
- Certified FFB Monitoring Task Appointment Letter in the name of Rudy Simorangkir (No. 001/KNDM/RSPO/III/2023) on March 1, 2023.

The auditee has also shown revisions to the mass balance recordings for the past 24 months. In this record, uncertified FFB has been re-recorded so that it is not included in the certified FFB category. Based on this evidence, the discrepancy has been met and the consistency of its application will be ensured again in the next assessment.

**Verified by** : **Briyogi Shadiwa**

**3.4.2. Opportunity for Improvement**

No	Ref. Std.	Description
1	3.7.2	<p><b>Records of training are maintained, where appropriate on an individual basis.</b></p> <p>At the KNDM Engine Room station there are 3 working shifts. The company already has 1 turbine and generator engine operator who has attended OHS operator training for production power aircraft. The company has the opportunity to continue and realize the OHS aircraft operator training program and production personnel.</p>
2	6.7.3	<p><b>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.</b></p> <p>Based on the results of observations of harvest work at KNDE, STHE, BSRE including Rimba Sari Cooperative and SJYE it is known that harvesters have used complete PPE, namely in the form of helmets, gloves, goggles, and boots. There are only a few new harvesters who are not used to wearing glasses because they are not used to doing harvest work. The company provides free PPE to harvesters.</p> <p>Based on observations of harvesting at KNDE, STHE, BSRE including Rimba Sari Cooperative and SJYE it is known that harvesters have used complete PPE, namely in the form of helmets, gloves, goggles, and boots. There are only a few new harvesters who are not used to wearing glasses, so it takes some getting used to. Based on the description above Companies have the opportunity to ensure that all harvest workers consistently use eye protection PPE while working.</p>
3	6.7.4	<p><b>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</b></p> <p>The unit of certification already has a list of workers which also includes <i>BPJS</i> of Employment participant numbers for all workers in each plantation and factory unit. Based on the results of a review of the December 2022 workforce registration documents and proof of payment for the <i>BPJS</i> of Employment for the same period, it is known that the unit of certification has registered and paid all of its workers in the <i>BPJS</i> of Employment program.</p> <p>The certification unit has also included some of its employees in the <i>BPJS</i> Health program. From the results of a review of the workforce list document for the December 2022 period, it is known that the total number of workers from PT GKG and PT GKS is 2,912 people. Then, the certification unit showed proof of <i>BPJS</i> Health payment for 1,614 workers on December 8<sup>th</sup>, 2022. Based on the results of interviews with workers in the sampling unit, for example security at the KNDM unit, information was obtained that the company had included workers and their families (wives and children) in the <i>BPJS</i> Health. This can be proven in the worker's pay slip document for December 2022 that there is a deduction for <i>BPJS</i> Health. In addition, based on the results of interviews with harvest workers at the SJYE unit, information was obtained that these workers had not been registered and had not received a <i>BPJS</i> Health card.</p> <p>The unit of certification indicates:</p> <ul style="list-style-type: none"> <li>• Minutes of <i>BPJS</i> Health Registration for the Kendawangan Region number 001/GKG-</li> </ul>

		<p>GKS/1/2023 on January 18<sup>th</sup>, 2023.</p> <ul style="list-style-type: none"> <li>• Evaluation of the Progress of BPJS Health Membership in the Kendawangan Region number 003/GKG-GKS/i/2023 on January 19<sup>th</sup>, 2023.</li> <li>• <i>BPJS</i> Health Membership Achievement Program for All Employees number 005/ GKG-GKS/i/2023 on January 29<sup>th</sup>, 2023.</li> </ul> <p>Based on the results of the document review above, it is known that as of January 2023 the company has registered 746 workers in the <i>BPJS</i> Health program, but there has been no feedback from <i>BPJS</i> Health. Workers who have not been registered are workers who are active in other health insurance such as PBI (APBD), PBI (APBN), husband's dependents, independent BPJS, etc. <i>BPJS</i> Health registration for all workers at PT GKG and PT GKS will continue until August 2023 with a target of 100%</p> <p>From the description above, it can be concluded that the certification unit has the opportunity to register and distribute <i>BPJS</i> Health cards to all of its workers according to a predetermined plan.</p>
4	7.7.3	<p><b>Peat subsidence is monitored, documented, and minimized.</b></p> <p>The company has been monitoring subsidence benchmarks periodically, namely by measuring subsidence benchmarks every month. The company renewed the poles by painting the entire subsidence stakes in Block P23 SJYE. So that the value of the rate of decline in subsidence cannot be known.</p> <p>The CH has the opportunity to improve the measure of decreasing the subsidence bar according to the time the subsidence bar was first installed.</p>

**3.4.3. Noteworthy Positive Components**

No	Description
1	The company consistently provides vitamins every 3 months as a preventive measure for workers' health
2	Good cooperation in providing information and audit evidence

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

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>Agriculture, Livestock and Plantation Agency of Ketapang Regency</b>            Interviewee: Seeding and Plantation Protection Sub-Coordinator            07 February 2023</p> <ul style="list-style-type: none"> <li>• The plantation business assessment has done in 2021 with the results of Plantation Class II.</li> <li>• In general, unit of certification has routinely submitted mandatory reports, such as the 2022 Plantation Business Development Report.</li> <li>• There were no negative issues from the community around the unit of certification regarding disturbances caused by the unit of certification’s operational activities.</li> <li>• The unit of certification already has adequate fire prevention and control facilities and infrastructure, in addition there is no history of fire incidents in the unit of certification’s concession area in the last 1 year.</li> <li>• Regularly reporting on land fires and CSR.</li> <li>• Communication between agency and unit of certification has been well established.</li> </ul>	<p>There are no negative issues that need further clarification.</p>
<p><b>Public Housing, Settlement Areas and Environmental Agency of Ketapang Regency</b>            Interviewee: Head of Environmental Protection and Management            07 February 2023</p> <ul style="list-style-type: none"> <li>• Unit of certification has valid environmental permit, liquid waste utilization permit, and hazardous waste storage permit.</li> <li>• Unit of certification routinely submit mandatory reports such as environmental management and monitoring implementation reports, hazardous waste management reports, and POME management reports to agency.</li> <li>• Agency routinely conducts supervision at PT Gunajaya Karya Gemilang. The results of the control were that there were no negative issues or reports related to the environment from the community, and until the time the audit was carried out there were no negative complaints/issues from the surrounding community.</li> </ul>	<p>There are no negative issues that need further clarification.</p>
<p><b>Manpower and Transmigration Agency of Ketapang Regency</b>            Interviewee: Industrial Relation Mediator            07 February 2023</p> <ul style="list-style-type: none"> <li>• Unit of certification has implemented a minimum wage in 2022 and provide other benefits to workers.</li> <li>• Has included its workers in the <i>BPJS</i> employment and health program.</li> </ul>	<p>There are no negative issues that need further clarification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> <li>Reporting and ratification of Company Regulations (PP) have been carried out in Manpower and Transmigration Agency of Ketapang Regency.</li> <li>Over the past year there have been no negative issues related to child labour, forced labour, illegal labour, discrimination, sexual harassment, etc. Apart from that, there were also no requests for mediation related to industrial relations issues from workers.</li> </ul>	
<p><b>National Land Agency of Ketapang Regency</b> Interviewee: Head of Administrative Subdivision 07 February 2023</p> <ul style="list-style-type: none"> <li>There were no complaints regarding land conflicts from the surrounding community that were submitted to National Land Agency Ketapang Regency</li> <li>The company has submitted regular reports regarding the use of <i>HGU</i> to National Land Agency of Ketapang Regency.</li> <li>Communication between the unit of certification and National Land Agency of Ketapang Regency is going well.</li> </ul>	<p>There are no negative issues that need further clarification.</p>
<p><b>Representatives of Surrounding Community</b> Interviewee:  <ul style="list-style-type: none"> <li>Kendawangan Kiri Village</li> <li>Banjarsari Village</li> <li>Mekar Utama Village</li> <li>Seriam Village</li> </ul> 07 February 2023</p> <ul style="list-style-type: none"> <li>Relationship between unit of certification and community around the unit of certification is in good condition.</li> <li>Unit of certification has made a partnership in the form of a scheme smallholder plantation which is already underway, and payments have started to be made to the cooperative.</li> <li>There is no issue of land fires in the unit of certification's area.</li> <li>There are no disputes between the unit of certification and the surrounding community.</li> <li>The CSR that has been carried out by the company includes programs in the fields of education, health, infrastructure and social affairs.</li> <li>There are no problems related to land compensation that has been done previously to the company. The land compensation process has involved related agencies and village representatives.</li> </ul>	<p>There are no negative issues that need further clarification.</p>
<p><b>FFB Supplier (Koperasi Fajar Mandiri)</b> Interviewee: Cooperative Management 07 February 2023</p> <ul style="list-style-type: none"> <li>FFB supplier has been working with unit of certification is bound by a contract.</li> </ul>	<p>There are no negative issues that need further clarification.</p>







Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> <li>Unit of certification has provided socialization related to company regulations, company code of ethics, compliance with PPE payments, and technical work.</li> <li>Payment of contract value is carried out in accordance with mutual agreement and on time.</li> <li>There is no complaint from FFB supplier regarding cooperation with the unit of certification.</li> </ul>	
<p><b>Gender Committee (PT GKG and PT GKS)</b> Head of Gender Committee February, 8<sup>th</sup> 2023</p> <p>Based on interviews, information was obtained that the realization of the work program of the gender committee in 2022 had been carried out such as, integrated healthcare centre (<i>posyandu</i>), periodic pregnancy checks, environmental hygiene, socialization of women workers' rights, socialization regarding the flow of complaint and socialization.</p> <p>Over the past year, there have been no issues related to gender, discrimination, harassment, violence or serious violations of reproductive rights in the corporate environment. At present it is certain that no workers who work with chemicals are pregnant or breastfeeding women, this is because the company has its own policy regarding the prohibition for pregnant or breastfeeding women workers to work in jobs related to chemicals. In addition, female workers are also entitled to menstrual leave and maternity leave.</p>	<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>
<p><b>LKS Bipartite (PT GKG and PT GKS)</b> Member of LKS Bipartite February, 8<sup>th</sup> 2023</p> <p><i>LKS Bipartite</i> have been registered in the Labor Agency Kampar District and there has been no change in management until this audit. Internal meetings or bipartite meetings (between the company and the union) have been documented in the minutes document. The implementation of payroll is in accordance with the determination of the minimum wage in Ketapang Regency in 2022 and 2023. In addition, payment of salaries has been in accordance with the specified time and through the bank transfer. The source also added information that in the last year there were no complaints regarding forced labor, child labor, discrimination or sexual harassment/violence.</p>	<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>
<p><b>Employee Cooperative (UPS)</b> Admin of Employee Cooperative February, 8<sup>th</sup> 2023</p> <p>Based on the results of interviews with representatives of employee cooperatives, information was obtained that cooperative employees are engaged in the business of</p>	<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
<p>supplying basic goods/materials for daily needs. The last annual member meeting will be held in 2022.</p> <p>The informant added information that the company has supported employee cooperative activities by providing department store buildings and borrowing transportation equipment to take stock of goods in the cooperative.</p>	
<p><b>PK Transporter (PT Suri Adidaya Kapuas)</b> February 8<sup>th</sup> 2023</p> <ul style="list-style-type: none"> <li>• No negative issue related to realization of work agreement.</li> <li>• Had good relationship with company.</li> <li>• Already know about RSPO system.</li> <li>• Ready anytime if there's audit by CB related to RSPO principal and indicator.</li> </ul>	<p>No negative issue needs to further observation.</p>
<p><u>Driver Dump Truk 96 PT. Gunajaya Karya Gemilang (BGA Grup) Di Vonis Satu Tahun Penjara - Post Kota Pontianak</u> Posted on December 21<sup>st</sup>, 2022.</p> <p>KETAPANG, (Pontianak city post): Incident of embezzlement of PT. Gunajaya Karya Gemilang (BGA Group) conducted by Arif Budiono Bin Turimin (40 years old) who is an employee of PT Gunajaya Karya Gemilang and works as a 96 Dump Truck Driver for PT. Gunajaya Karya Gemilang took place on Wednesday May 18 2022 at the traction warehouse of PT. Gunajaya Karya Gemilang.</p> <p>Arif Budiono Bin Turimin committed the embezzlement by submitting goods in the form of two Gajah Tunggal (GT) dump truck outer tires, one inner tube, one Marset at the traction office, then a receipt was issued to collect the goods. then he took the goods at the Traski Warehouse then immediately installed one inner tube, one marset at the PT. Gunajaya Karya Gemilang, and for the two outer tires of the Gajah Tunggal (GT) Dump Truck brand, by Arif Budiono Bin Turimin they were not installed on the Dump Truck that he was driving instead he brought them home to his house which is located at BSRE Estate Employee Housing PT. Gunajaya Karya Gemilang Banjarsari Village, Kendawangan District, Ketapang Regency, West Kalimantan Province.</p> <p>On May 24, 2022 Arif Budiono Bin Turimin took the two Gajah Tunggal (GT) brand dump truck tires to Mulyono's house and Arif Budiono sold the tires to Mulyono with the intention of paying off his debt at Mulyono's stall in the amount of three million rupiah.</p> <p>Due to this incident PT. Gunajaya Karya Gemilang suffered a loss of three million seven hundred and fifty thousand rupiahs and reported Arif Budiono Bin Turimin to the Kendawangan</p>	<p>The unit of certification has shown documents for settlement of cases of workers embezzling tires and diesel, such as:</p> <ul style="list-style-type: none"> <li>• Event chronology</li> <li>• Letter of receipt of the report to the Kendawangan police with number STPL/15/IX/2022/SPKT.UNIT RESKRIM/KENDAWANGAN POLICE/POLRES KETAPANG/POLDA KALBAR ON September 3, 2022.</li> <li>• Statement letter from the worker as the tire buyer</li> <li>• Minutes of handling cases of embezzlement of tires issued by the certification unit.</li> <li>• Letter of resignation from the suspect and statement letter from the unit of certification to the worker regarding his availability to pay the fine.</li> <li>• Criminal decision number 484/Pid.B/2022/PN Ktp regarding the punishment given to the suspect.</li> </ul> <p>Based on the results of interviews with representatives of LKS Bipartite and management of the certification unit, it is known that the suspect on behalf of Arif Budiono is no longer working at the company because he is currently serving a sentence in the police detention centre.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Police for legal proceedings, so that this case was rolled out to the Ketapang District Court.</p> <p>Public Prosecutor Adi Tyas Tamtomo, S.H., in reading out the charges at the trial demanded</p> <ol style="list-style-type: none"> <li>1). Declare Arif Budiono Bin Turimin legally and convincingly proven guilty of committing the Crime of Embezzlement with the element "Embrace committed by a person whose control over goods is caused by a work or livelihood relationship or because they receive wages for it" Article 374 of the Criminal Code, and Article 372 of the Criminal Code;</li> <li>2). Sentence a sentence to Arif Budiono with imprisonment for one year and three months reduced entirely from the temporary detention period that has been served and stipulates that Arif Budiono Bin Turimin remains in custody.</li> <li>3). Stating that the evidence is in the form of a sheet of BGA goods request (BPB) white paper bill with reservation no 1781784/4920025249 and order no 20294160; remain attached to the case file.</li> <li>4). Two outer tires of GT MAX TRANTION brand Gajah Tunggal. Returned to PT. Gunajaya Karya Gemilang) BGA Group Through the Public Prosecutor; and Stipulates that the Defendant should pay court fees of five thousand rupiahs.</li> </ol> <p>After listening to the statements of witnesses and evidence presented at the trial as well as the public prosecutor's indictment, the Ketapang District Court held a Judgment Session open to the public which was held at the Ketapang District Court on Tuesday, December 20, 2022 by Chief Judge Ega Shaktiana, SH. MH accompanied by Judge Bagus Raditya Wiradana, S.H. and Dhimas Nugroho Priyosukamto, S.H assisted by Leni Hermananingsih, S.H., Registrar at the Ketapang District Court and attended by Adi Tyas Tamtomo, S.H.,</p> <p>The Public Prosecutor of the Ketapang District Attorney and before Arif Budiono Bin Turimin, handed down a decision</p> <ol style="list-style-type: none"> <li>1). Declare the Defendant Arif Budiono Bin Turimin, has been legally and convincingly proven guilty of committing the crime of embezzlement in employment relations, as the Public Prosecutor's first alternative indictment,</li> <li>2). Sentenced punishment to the Defendant therefore with imprisonment for one year,</li> <li>3). Determine the period of arrest and detention that has been served by the Defendant to be deducted entirely from the sentence imposed,</li> <li>4) Stipulates that the Defendant Arif Budiono Bin Turimin remains in custody,</li> <li>5). Stipulates evidence in the form of one) BON sheets of white paper requesting goods (BPB) BGA with reservation no 1781784/4920025249 and order no 20294160 still attached in</li> </ol>	

<b>Public Issues (Institution/ NGO/Community)</b>	<b>Auditor Verification</b>
<p>the case file, two GT MAX TRANTION outer tires for the Gajah Tunggal brand were returned to PT GKG BGA Group, Charged the Defendant Arif Budiono Bin Turimin to pay court costs in the amount of five thousand rupiahs.</p> <p>The verdict handed down by the panel of judges was lighter than the demands of the public prosecutor who demanded one year and three months in prison.</p>	

<b>4.0</b>	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>						
<b>4.1</b>	<b>Formal Sign-off of Assessment Findings</b>						
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <table><tr><td><b>PT Gunajaya Karya Gemilang Management Representative</b></td><td><b>Mutuagung Lestari Lead Auditor</b></td></tr><tr><td></td><td></td></tr><tr><td><b><u>Jonnes Daulay</u></b> Sunday, 13 May 2023</td><td><b><u>Briyogi Shadiwa</u></b> Sunday, 13 May 2023</td></tr></table>	<b>PT Gunajaya Karya Gemilang Management Representative</b>	<b>Mutuagung Lestari Lead Auditor</b>			<b><u>Jonnes Daulay</u></b> Sunday, 13 May 2023	<b><u>Briyogi Shadiwa</u></b> Sunday, 13 May 2023
<b>PT Gunajaya Karya Gemilang Management Representative</b>	<b>Mutuagung Lestari Lead Auditor</b>						
							
<b><u>Jonnes Daulay</u></b> Sunday, 13 May 2023	<b><u>Briyogi Shadiwa</u></b> Sunday, 13 May 2023						

**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	Ketapang Regency	-	Interview via telephone	07 February 2023	✓	
2	Manpower and Transmigration Agency	Ketapang Regency	-	Interview via telephone	07 February 2023	✓	
3	Environmental Agency	Ketapang Regency	-	Interview via telephone	07 February 2023	✓	
4	National Land Agency	Ketapang Regency	-	Interview via telephone	07 February 2023	✓	
5	Gender Committee	Kendawangan Sub District, Ketapang District	-	Direct interview	08 February 2023	✓	
6	LKS Bipartite	Kendawangan Sub District, Ketapang District	-	Direct interview	08 February 2023	✓	
7	Employee Cooperative	Kendawangan Sub District, Ketapang District	-	Direct interview	08 February 2023	✓	
8	Local Village Representative Interviewee: <ul style="list-style-type: none"> <li>• Village of Mekar Utama</li> <li>• Village of Kendawangan Kiri</li> <li>• Village of Banjarsari</li> <li>• Village of Seriam</li> </ul>	Ketapang Regency	-	Direct interview	07 February 2023	✓	
9	FFB Supplier (Koperasi Fajar Mandiri)	Ketapang Regency	-	Direct interview	07 February 2023	✓	
10	<b>Kendawangan Mill:</b> <ul style="list-style-type: none"> <li>• 2 Weighbridge Operators</li> <li>• 5 QA operators</li> <li>• 3 Grading operators</li> <li>• 1 Sterilizer operator</li> <li>• 1 Boiler operator</li> <li>• 1 Engine room operator</li> <li>• 1 Nut &amp; Kernel operator</li> <li>• 1 WTP Operator</li> <li>• 1 WWTP Operator</li> <li>• 1 Security Officer</li> </ul>	Kendawangan Sub District, Ketapang District	-	Direct interview	07 February 2023	✓	

	<ul style="list-style-type: none"> <li>• 2 Workshop Officer</li> <li>• 1 Analysis Laboratory Officer</li> </ul>						
11	<b>Kendawangan Estate</b> <ul style="list-style-type: none"> <li>• 3 Fertilizer Applicator</li> <li>• 2 Fertilizer Foreman</li> <li>• 1 Foreman Coordinator</li> <li>• 1 Transportation Foreman</li> <li>• 1 Dump Truck Driver</li> <li>• 3 Loading FFB Operator</li> <li>• 1 Transport Foreman</li> <li>• 1 Sprayer Foreman</li> <li>• 3 Sprayer Chemist</li> <li>• 1 Harvester Foreman</li> <li>• 3 Harvester</li> <li>• 3 Daycare Officer</li> <li>• 1 Residents of employee housing</li> <li>• 3 Medical Workforce</li> <li>• 3 Workshop Office</li> </ul>	Kendawangan Sub District, Ketapang District	-	Direct interview	07 February 2023	✓	
12	<b>Sungai Tapah Estate</b> <ul style="list-style-type: none"> <li>• 3 Fertilizer Applicator</li> <li>• 2 Fertilizer Foreman</li> <li>• 1 Foreman Coordinator</li> <li>• 1 Transportation Foreman</li> <li>• 1 Sprayer Chemis Foreman</li> <li>• 3 Sprayer Chemist</li> <li>• 2 Harvester Foreman</li> <li>• 3 Harvester</li> <li>• 2 Land Application Operators</li> <li>• 2 Generator Officer</li> <li>• 1 Medical Workforce</li> <li>• 2 Daycare Officer</li> </ul>	Kendawangan Sub District, Ketapang District	-	Direct interview	08 February 2023	✓	
13	<b>Seriam Jaya Estate</b>	Kendawangan Sub	-	Direct interview	10	✓	



	<ul style="list-style-type: none"> <li>• 3 Fertilizer Applicator</li> <li>• 2 Fertilizer Foreman</li> <li>• 1 Foreman Coordinator</li> <li>• 1 Transportation Foreman</li> <li>• 2 FFB Loader</li> <li>• 1 Transport Foreman</li> <li>• 1 Sprayer Foreman</li> <li>• 3 Sprayer</li> <li>• 1 Harvester Foreman</li> <li>• 3 Harvester</li> <li>• 1 Daycare Officer</li> <li>• 1 Kindergarten Teacher</li> <li>• 1 Medical Workforce</li> <li>• 2 Residents of employee housing</li> </ul>	District, Ketapang District			February 2023		
14	<b>Banjar Sari Estate</b> <ul style="list-style-type: none"> <li>• 3 Fertilizer Applicator</li> <li>• 1 Fertilizer Foreman</li> <li>• 1 Dump Truck Driver</li> <li>• 2 FFB Loader</li> <li>• 1 Transport Foreman</li> <li>• 1 Sprayer Foreman</li> <li>• 3 Sprayer</li> <li>• 2 Harvester Foreman</li> <li>• 4 Harvester</li> <li>• 1 Medical Workforce</li> <li>• 3 Daycare Officer</li> <li>• 3 Residents of employee housing</li> </ul>	Kendawangan Sub District, Ketapang District	-	Direct interview	09 February 2023	✓	
15	<b>Kopbun Rimba Sari</b> <ul style="list-style-type: none"> <li>• 9 Harvesters</li> <li>• 2 Harvesters Foreman</li> <li>• 1 Foreman Coordinator</li> </ul>	Kendawangan Sub District, Ketapang District	-	Direct interview	09 February 2023	✓	
16	PK Transporter (PT Suri Adidaya Kapuas)	Kendawangan Sub District, Ketapang District	-	Direct interview	08 February 2023	✓	

17	World Wide Fund	Indonesia	<a href="mailto:wwf-indonesia@wwf.or.id">wwf-indonesia@wwf.or.id</a>		31 January 2023		
18	Wahana Lingkungan Hidup Indonesia	Indonesia	<a href="mailto:informasi@walhi.or.id">informasi@walhi.or.id</a>		31 January 2023		
19	Sawit Watch	Indonesia	<a href="mailto:info@sawitwatch.or.id">info@sawitwatch.or.id</a>		31 January 2023		
20	AMAN	Indonesia	<a href="mailto:rumahaman@sawitwatch.or.id">rumahaman@sawitwatch.or.id</a>		31 January 2023		

Appendix 2. Assessment Program

DATE	6 – 12 February 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
<b>Monday, 6 February 2023</b>		
07.25 – 09.00	JAKARTA (CGK) → PONTIANAK (PNK)	All Auditor
10.25 – 11.10	PONTIANAK (PNK) → KETAPANG (KTG)	All Auditor
11.10 – 15.00	KETAPANG → PT GKG / PT GKS	All Auditor
15.30 – 17.00	<b>Opening Meeting :</b> <ul style="list-style-type: none"> <li>• Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li> <li>• Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li> </ul>	All Auditor
<b>Tuesday, 7 February 2023</b>		
08.00 – 12.00	<ul style="list-style-type: none"> <li>• Public consultation with stakeholder to relevant agency in Ketapang Regency</li> <li>• Stakeholder consultation to affected communities surrounding the plantations and previous land owner.</li> <li>• Document review and completing audit checklist.</li> </ul> <b>Field Observation to Kendawangan Estate</b> Aspect to be verified : <ul style="list-style-type: none"> <li>• Implementation of Legal Aspect (Land Ownership, Legal Boundaries)</li> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>• Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> <li>• Implementation of Employment Procedure and Mechanism Aspect</li> <li>• Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>• Interview with related personnel's during field observation.</li> </ul>	ELU  SIA & BRI FIT SIA & BRI  FIT SIA & BRI FIT FIT, SIA & BRI
12.00 – 14.00	<b>Break</b>	All Auditor
14.00 – 17.00	<b>Field observation to Kendawangan POM:</b> <ul style="list-style-type: none"> <li>• Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Dispatch CPO)</li> <li>• Occupational Health &amp; Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond)</li> <li>• Implementation of Employment Procedure and Mechanism Aspect</li> </ul> <b>Presentation of Daily Progress</b>	FIT  SIA & BRI  ELU  All Auditor
<b>Wednesday, 8 February 2023</b>		

DATE	6 – 12 February 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 12.00	<b>Field Observation to Sungai Tapah Estate</b> Aspect to be verified : <ul style="list-style-type: none"> <li>• Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>• Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> <li>• Implementation of Employment Procedure and Mechanism Aspect</li> <li>• Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>• Interview with related personnel's during field observation.</li> </ul>	ELU FIT SIA & BRI FIT SIA & BRI FIT FIT, SIA & BRI
12.00 – 14.00	<b>Break</b>	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> <li>• <b>Document review and completing audit checklist.</b></li> <li>• <b>Stakeholder Interview:</b> <ul style="list-style-type: none"> <li>- Gender Committee, Worker Union, Worker Cooperation</li> <li>- Local Contractor for Mill and Estate</li> <li>- Third Parties Supplier</li> </ul> </li> </ul> <b>Presentation of Daily Progress.</b>	All Auditor SIA & BRI FIT & ELU BRI All Auditor
<b>Thursday, 9 February 2023</b>		
08.00 – 12.00	<b>Field Observation to Banjar Sari Estate &amp; Kopbun Rimba Sari</b> Aspect to be verified : <ul style="list-style-type: none"> <li>• Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>• Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> <li>• Implementation of Employment Procedure and Mechanism Aspect</li> <li>• Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>• Interview with related personnel's during field observation.</li> </ul>	ELU FIT SIA & BRI FIT SIA & BRI FIT FIT, SIA & BRI
12.00 – 14.00	<b>Break</b>	All Auditor
14.00 – 17.00	<b>Document review and completing audit checklist.</b> <b>Presentation of Daily Progress.</b>	All Auditor
<b>Friday, 10 February 2023</b>		

DATE	6 – 12 February 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 12.00	<b>Field Observation to Seriam Jaya Estate &amp; Kopbun Fajar Mandiri</b> Aspect to be verified : <ul style="list-style-type: none"> <li>• Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>• Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> <li>• Implementation of Employment Procedure and Mechanism Aspect</li> <li>• Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>• Interview with related personnel's during field observation.</li> </ul>	ELU FIT SIA & BRI FIT SIA & BRI FIT FIT, SIA & BRI
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 17.00	<b>Document review and completing audit checklist.</b>	<b>All Auditor</b>
	<b>Presentation of Daily Progress.</b>	
<b>Saturday, 11 February 2023</b>		
08.00 – 11.00	<b>Document review and completing audit checklist.</b>	<b>All Auditor</b>
11.00 – 14.00	<b>Internal Team Discussion</b>	<b>All Auditor</b>
14.00 – 17.00	<b>Closing Meeting :</b> <ul style="list-style-type: none"> <li>• Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timeline of CAR's, Conclusion)</li> <li>• Comments, Responses and Questions</li> </ul>	<b>All Auditor</b>
<b>Sunday, 12 February 2023</b>		
09.15 – 10.05	<b>KETAPANG (KTG) → PONTIANAK (PNK)</b>	<b>All Auditor</b>
13.45 – 15.15	<b>PONTIANAK (PNK) → JAKARTA (CGK)</b>	<b>All Auditor</b>