

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

**[✓] Surveillance**

Name of Management Organization : **Pembangunan Raya Palm Oil Mill – PT Agro Sejahtera Manunggal, Bumitama Agri Ltd**

Plantation Name : **PT Agro Sejahtera Manunggal** (Pembangunan Raya Estate, Belaban Raya Estate, Bengkuang Raya Estate, Cooperative Agro Seriam Mandiri) and **PT Gunajaya Harapan Lestari** (Teluk Rengit Estate)

Location : Seriam Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia

Certificate Code : **MUTU-RSPO/126**

Date of Certificate Issue : 25 March 2019      Date of License Issue : 25 June 2023

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

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-4	27 February – 4 March 2023	Briyogi Shadiwa (Lead Auditor), Erika Lucitawati, Firda Tarunajaya and Sabiah Dhiningtyas Utami	Haikal Ramadhan Kharismansyah	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-4	15 June 2023

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Figure 1. Location Map of PT Agro Sejahtera Manunggal

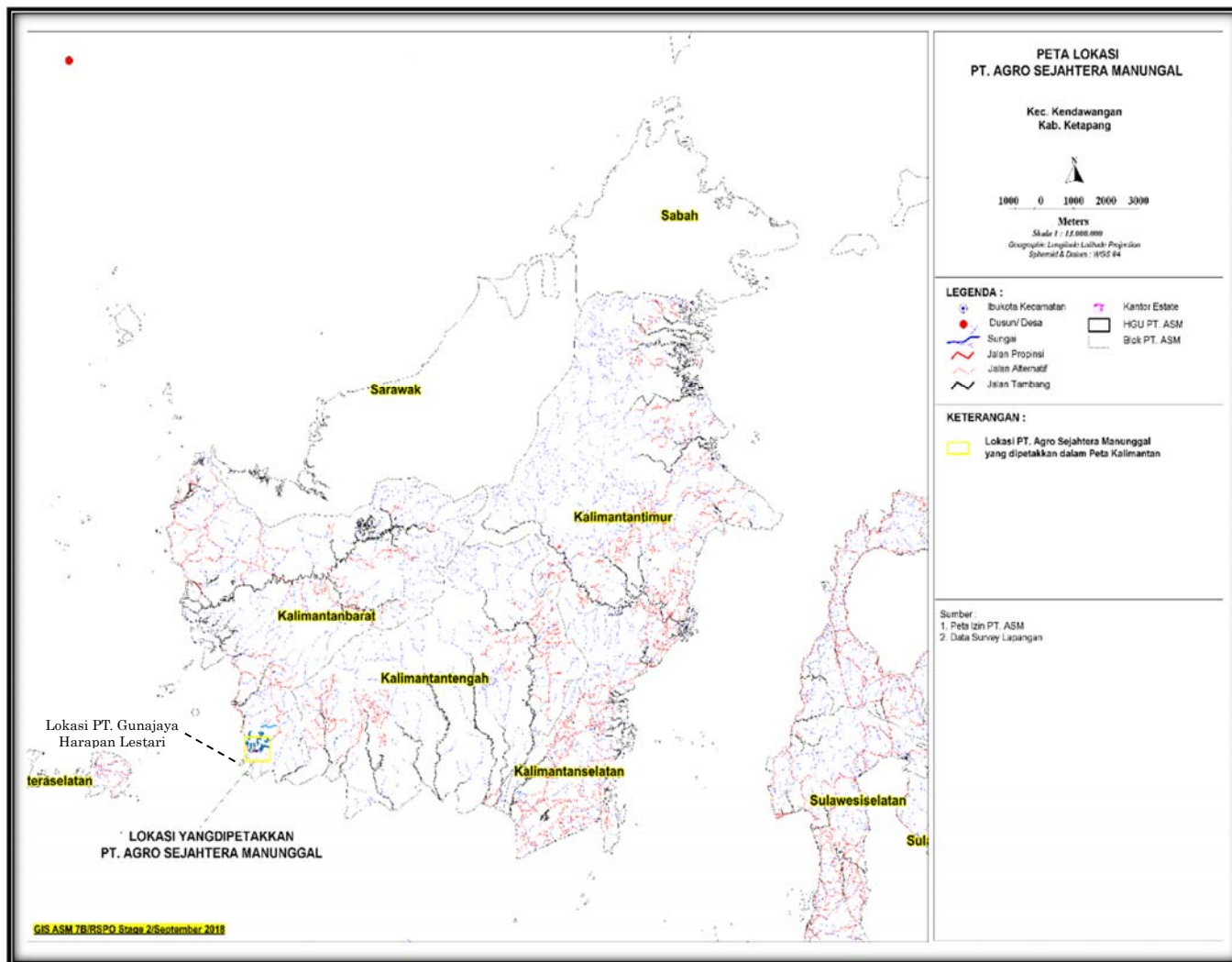


Figure 2. Operational Map of PT Agro Sejahtera Manunggal

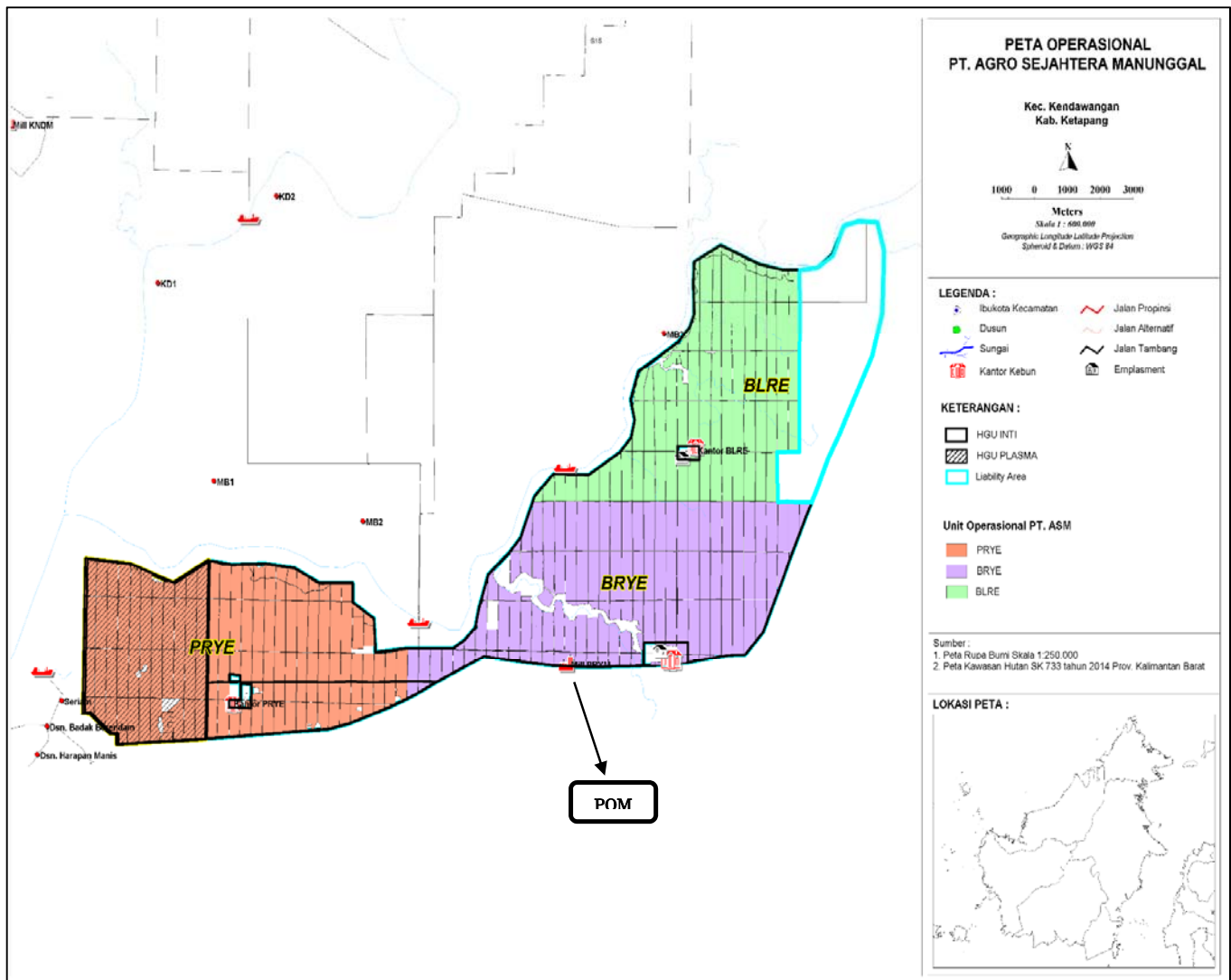
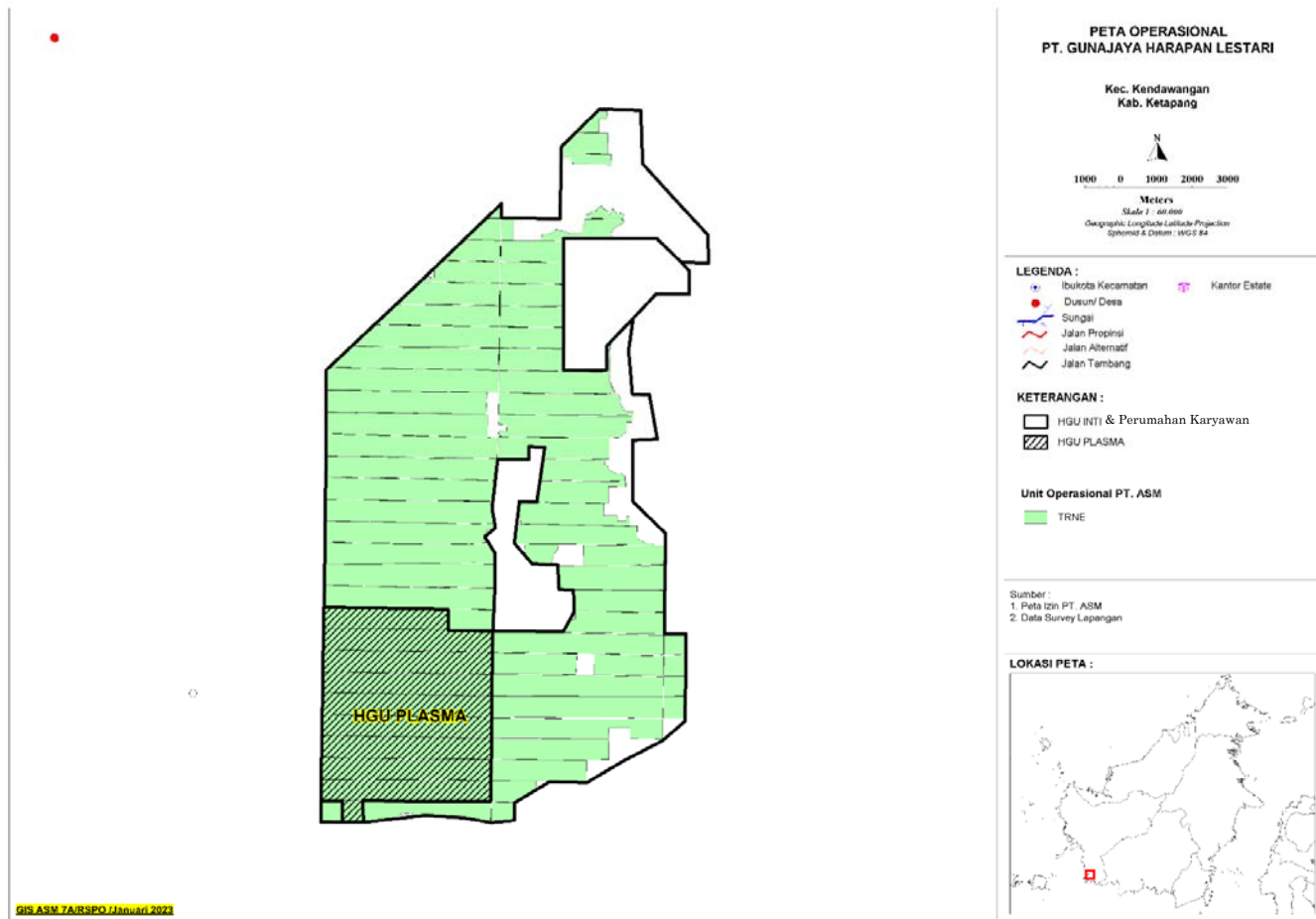


Figure 3. Operational Map of PT Gunajaya Harapan Letsari



## Abbreviations Used

AMDAL	:	<i>Analisis Mengenai Dampak Lingkungan</i> (Environmental Impact Assessment)
APD / PPE	:	<i>Alat Pelindungan Diri</i> (Personal Protection Equipment)
APL	:	<i>Area Penggunaan Lain</i> (Other Land Used)
ASA	:	Annual Surveillance Assessment
ASEAN	:	Association of South East Asian Nations
ASM	:	Agro Sejahtera Manunggal
BGA	:	Bumitama Gunajaya Agro
BHS	:	BGA Harvesting System
BLRE	:	Belaban Raya Estate
BMS	:	BGA Manuring System
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> /Social Insurance
BPN	:	<i>Badan Pertanahan Nasional</i> /National Land Agency
BRYE	:	Bengkuang Raya Estate
BSS	:	BGA Spraying System
CBNT	:	Central Bengkuang <i>Traksi</i>
CLA	:	Collective Labour Agreement
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
CV	:	<i>Commanditaire Vennootschap</i> /Small business enterprise
D&L	:	Document & Legal
DLW	:	Decent Living Wages
EFB	:	Empty Fruit Bunch
ETP	:	Effluent Treatment Plant
FFB	:	Fresh Fruit Bunch
FPIC	:	Free, Prior, Inform, Consent
GHG	:	Green House Gases
GHL	:	Gunajaya Harapan Lestari
GKG	:	Gunajaya Karya Gemilang
GKS	:	Gunajaya Ketapang Sentosa
HCV	:	High Conservation Value
HIRAC	:	Hazard Identification Risk Assessment & Control
HO	:	Head Office
IDR	:	Indonesian Rupiah
IPM	:	Integrated Pest Management
ISPO	:	Indonesian Sustainable Palm Oil
KER	:	Kernel Extraction Rate
KTP	:	<i>Kartu Tanda Penduduk</i> / Identity Card
LKS Bipartite	:	<i>Lembaga Kerja Sama Bipartite</i>
MBNR	:	Metro Bengkuang Regional
MCU	:	Medical Check Up
MoU	:	Memorandum of Understanding
MSDS	:	Material Safety Data Sheet
NGO	:	Non-Government Organization
OHS	:	Occupational, Health and Safety

OER	:	Oil Extraction Rate
PAD	:	Public Affairs Department
P2K3	:	<i>Panitia Pembina Kesehatan Keselamatan Kerja</i>
PIC	:	Person In Charge
PK	:	Palm Kernel
PP	:	<i>Peraturan Perusahaan</i>
PPE	:	Personal Protection Equipment
PRYE	:	Pembangunan Raya Estate
PRYM	:	Pembangunan Raya Mill
PT ASM	:	PT Agro Sejahtera Manunggal
PTB	:	<i>Pekerja Tetap Bulanan/Monthly Permanent Worker</i>
PTH	:	<i>Pekerja Tetap Harian/Daily Permanent Worker</i>
QA	:	Quality Assurance
RKL/RPL	:	<i>Rencana kelola lingkungan/ Rencana pemantauan lingkungan</i>
RSPO	:	Roundtable on Sustainable Palm Oil
SAE	:	Society of Automotive Engineers
SCCS	:	Supply Chain Certification System
SEIA	:	Social Environmental Impact Assessment
SIA	:	Social Impact Assessment
SMK3	:	<i>Sistem Manajemen Kesehatan, Keselamatan, Kerja</i>
SOP	:	Standard Operational Procedures
TMAT	:	<i>Tinggi Muka Air Tanah/Ground water level</i>
TRNE	:	Teluk Rengit Estate
UKL/UPL	:	<i>Upaya Kelola Lingkungan/Upaya Pantau Lingkungan</i>
WLTK	:	<i>Wajib Lapor Tenaga Kerja / Employment Report</i>
WTP	:	Water Treatment Plant

1.0	SCOPE OF THE CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used		
		<ul style="list-style-type: none"><li>• RSPO Certifications Systems for Principles &amp; Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020).</li><li>• Indonesia National Interpretation RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSPO Board of Governors on 20<sup>th</sup> April 2020.</li></ul>	
1.2	Organisation Information		
1.2.1	Organization name listed in the certificate	Pembangunan Raya Palm Oil Mill – PT Agro Sejahtera Manunggal, Bumitama Agri Ltd	
1.2.2	Contact person	Lim Sian Choo	
1.2.3	Organisation address and site address	RSPO 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 RSPO member	1-0043-07-000-00 – 08 October 2007	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Pembangunan Raya POM and 6 Supply Base: <ul style="list-style-type: none"><li>• PT Agro Sejahtera Manunggal (Pembangunan Raya Estate, Belaban Raya Estate, Bengkuang Raya Estate, Cooperative Agro Seriam Mandiri)</li><li>• PT Gunajaya Harapan Lestari (Teluk Rengit Estate)</li></ul> Extension Scope: <b>Teluk Rengit Estate</b>	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude
			Longitude
	Pembangunan Raya	Seriam Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 32' 38"
			E 110° 23' 57"
1.4.2	Location of Certification Scope of Supply Base		



	Name of Supply Base	Location	Coordinate				
			Latitude	Longitude			
	Pembangunan Raya	Seriam Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 33' 13"	E 110° 18' 43"			
	Bengkuang Raya	Seriam Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 32' 41"	E 110° 24' 12"			
	Belaban Raya	Seriam Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 30' 29"	E 110° 24' 15"			
	Cooperative Agro Seriam Mandiri (660 Farmers)	Seriam Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 33' 13"	E 110° 18' 43"			
	Teluk Rengit Estate	Pulau Bawal Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 43' 37.11"	E 110° 06' 24.71"			
1.5	Description of Area Statement						
1.5.1	Tenure						
	• State:						
	- PT Agro Sejahtera Manunggal		6,316.77	Ha			
	- PT Gunajaya Harapan Lestari		1,973.45	Ha			
	• Community		-				
1.5.2	Area Statement						
		PT ASM	Cooperative Agro Seriam Mandiri	PT GHL	Total (Ha)		
	Total area	5,355.97	960.80	1,973.45	8,290.22		
	Mature area	4,881.02	914.77	1,630.80	7,426.59		
	Immature area	-	-	-	0		
	Mill/Building	78.52	-	12.19	90.71		
	Road	239.75	35.76	77.67	353.18		
	Mill	8.40	-	-	8.40		
	Unplanted Area (swamp)	24.50	-	137.78	162.28		
	HCV	102.64	-	115.01	217.65		
	Occupation	21.14	10.27	-	31.41		
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Belaban Raya Estate (Ha)	Bengkuang Raya Estate (Ha)	Pembangunan Raya Estate (Ha)	Cooperative Agro Seriam Mandiri (Ha)	Teluk Rengit Estate (Ha)	Total (Ha)
	2009	390.69	479.48	1,063.14	911.12	-	2,844.43
	2010	1,162.05	1,531.12	152.35	-	100.12	2,945.64
	2011	70.91	12.23	-	-	815.89	899.03

		2012	9.46	-	9.59	3.65	567.35	590.05
		2013	-	-	-	-	134.95	134.95
		2014	-	-	-	-	12.49	12.49
		TOTAL	1,633.11	2,022.83	1,225.08	914.77	1,630.80	7,426.59
1.6.2	New Planting area after January 2010					Ha		
1.6.3	Planting Cycle					1 <sup>st</sup> Cycle		
1.7	Description of Mill and Supply Base							
1.7.1	Description of Mill							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	Pembangunan Raya	60	351,121.96	80,586.96	22.95	16,971.49	4.83	
	<i>*Production data source from February 2022 to January 2023</i>							
1.7.2	Description of Certification Scope of Supply Base							
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (ton/year)	Yield (ton/ha/ year)	Supplied to Mill		
						FFB (ton/year)	%	
	Pembangunan Raya	1,318.22	1,225.08	31,004.60	25.31	31,004.60	100	
	Bengkuang Raya	2,304.58	2,022.83	40,888.67	20.21	40,888.67	100	
	Belaban Raya	1,733.17	1,633.11	33,717.69	20.65	33,717.69	100	
	Cooperative Agro Seriam Mandiri (660 Farmers)	960.80	914.77	25,625.71	28.01	25,625.71	100	
	TOTAL	6,316.77	5,795.79	131,236.67	22.64	131,236.67	100	
	<i>*Production data source from February 2022 to January 2023</i>							
1.7.3	FFB description from other source							
	Name of sources/Organisation (RSPO certified / non-certified)	Type of Organization	Number of Smallholders	Production Area (Ha)	Supplied to Mill			
					FFB (tonnes/year)			
	Teluk Rengit Estate	Subsidiary of BGA	-	1,630.80	62,817.23			
	PT GKS SJYE (Seriam Jaya Estate) <b>RSPO Certified</b>	Subsidiary of BGA	-	-	7,119.34			
	PT GKS MSJE (Membuluh Sejahtera Estate) <b>RSPO Certified</b>	Subsidiary of BGA	-	-	288.04			
	PT GKG BSRE ( Banjar Sari Estate ) <b>RSPO Certified</b>	Subsidiary of BGA	-	-	371.81			
	PT ASM - PRYE (Pembangunan Raya Estate) (2010-2012) Sanction Area <b>Non certified</b>	Subsidiary of BGA	-	-	718.77			
	PT ASM - BRYE (Bengkuang Raya Estate) (2010-2012) Sanction Area <b>Non certified</b>	Subsidiary of BGA	-	-	6,237.01			
	PT ASM - BLRE (Balaban Raya Estate) (2010-2012) Sanction Area <b>Non certified</b>	Subsidiary of BGA	-	-	5,667.82			
	PT ASM - BLRE (Balaban Raya	Subsidiary of BGA	-	-	13,823.57			

	Estate) (2010-2012) Liability <b>Non certified</b>				
	POKTAN Sawit Maju Sejahtera PRYE <b>Non certified</b>	Subsidiary of BGA	-	-	3,118.08
	POKTAN Sawit Maju Sejahtera BRYE <b>Non certified</b>	Subsidiary of BGA	-	-	15,151.83
	POKTAN Sawit Maju Sejahtera BLRE <b>Non certified</b>	Subsidiary of BGA	-	-	5,237.60
	Koperasi Agro Seriam Mandiri – SHM <b>Non certified</b>	Subsidiary of BGA			9,770.52
	PT GKS SJYE (Seriam Jaya Estate) <b>Non certified</b>	Subsidiary of BGA	-	-	24,565.00
	PT GKS MSJE (Membuluh Sejahtera Estate) <b>Non certified</b>	Subsidiary of BGA	-	-	64,998.67
	<b>TOTAL</b>			<b>219,885.29</b>	
	<i>*Production data source from February 2022 to January 2023</i>				
1.7.4	Product categories	FFB, CPO, PK			
1.8	Tonnage of Product				
1.8.1	Past Annual Claim Certified Product	Last Year Projected Certified Volume (Ton)	Actual Certified Volume from February 2022 to January 2023 (Ton)		
	FFB Processed	156,000	139,015		
	CPO Production	37,181	31,862		
	Palm Kernel (PK) Production	7,830	6,940		
1.8.2	Product selling				
	Type of selling product	Actual selling product for last year (February 2022 to January 2023) (MT)			
	CSPO sold as RSPO certified product	-			
	CSPK sold as RSPO certified product	1,996.51			
	CSPO sold under another scheme	-			
	CSPK sold under another scheme	-			
	CSPO sold as conventional	26,625.48			
	CSPK sold as conventional	4,721.32			
	*There's opening stock of CSPK on February 2022 as amount as 232.36 ton.				
1.8.3	Estimate of Certified FFB Claim				
	Name of Estates	Total Area (Ha)	Production Area (Ha)	FFB (tones/year)	Yield (tones/ha/year)
	Pembangunan Raya	1,318.22	1,225.08	30,600.00	24.98
	Bengkuang Raya	2,304.58	2,022.83	38,400.00	18.98
	Belaban Raya	1,733.17	1,633.11	31,000.00	18.98
	Cooperative Agro Seriam Mandiri (660 Farmers)	960.80	914.77	24,700.00	27.00
	Teluk Rengit Estate	1,973.45	1,630.80	44,000.00	26.98
	<b>TOTAL</b>	<b>8,290.22</b>	<b>7,426.59</b>	<b>168,700.00</b>	<b>22.72</b>

	<i>*Projected FFB production for 12 months of certificate</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tones/ hour)	FFB Processed (tones/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tones)	Extraction (%)	Out put (tones)	Extraction (%)	
	Pembangunan Raya	60	168,700.00	38,800.00	22.98	8,100.00	4.80	MB
	<i>*Projected CSPO and CSPK production for 12 months of certificate</i>							
1.9	Other Certifications							
	ISO 9001:2008				-			
	ISO 14001: 2004				-			
	OHSAS 18001:2007				-			
	ISCC				-			
	ISPO				Certificate No. MUTU-ISPO/194, valid thru 3 November 2024			
	Others							
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 Marqa Rahayu			2023	-				

		KUD Usaha Bersama	2023		-
		KUD Tani Santoso	2023		-
		PT Tanah Tani Lestari	2023		NPP Audit (2022)
		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 Pulau 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 Gunjaya 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			
SukaDamai (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	-
		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,	Wait for RaCP

					Kalimantan Barat	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 Tunggul Jaya Mill (PT Ladang Sawit Mas)	2020	PT Ladang Sawit Mas	2020	Ketapang District, West Kalimantan	Certified
KopBun Bukit Tunggul Sejahtera			2023	-		
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	Certified		
PT Sejahtera Sawit Lestari			2023	-		
PT Karya Makmur Langgeng			2023	Certified		
PT Gemilang Makmur Subur			2023	Certified		
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	Progress of Associated Smallholders and Out growers for Certifiable Standard					
	The Certificate holder has an agreement with smallholders’ scheme, the scheme smallholders have ben listed on the time bound plan and will be including in the certification process in the next following years in accordance with determined time bound plan.					



<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>ASA-4</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, Bachelor of Forestry from the Department of Silviculture, Bogor Agricultural University. He has working as an Operational Staff in an Oil Palm Plantation Company in Indonesia. Attended trainings are Lead Auditor RSPO, Lead Auditor ISPO, Quality Management Systems (ISO 9001:2015) by IRCA, Environmental Management Systems (ISO 14001:2015), ISO 19011:2018, ISO 17021:2011 and ISO 17065:2012. During this assessment, he 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-4</b>	<p>Number of auditors: 3 auditors and 1 trainee auditor</p> <p>Number of days for <b>ASA-4</b> at site: 6 days</p> <p>Number of working days for <b>ASA-4</b> at site: 18 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>ASA-4</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Agro Sejahtera Manunggal – Pembangunan Raya 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-4 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA-Recertification.</p> <p>All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-4.</p>



The opening meeting was held on February 27<sup>th</sup>, 2023, at Meeting Room Office. As for the participants who attended the opening meeting included Sub Head Estate and Mill Sub Head, Support Team from Jakarta and other staff at Estate and POM. Closing meeting was held on March 4<sup>th</sup>, 2023, which was attended by the same participants as the opening meeting. Management PT Agro Sejahtera Manunggal accept all the ASA-4 audit results.

The assessment program please find Appendix 2

**2.2.3**
**Locations of Assessment**
**ASA-4**

The sampling location consider the issue arise from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:

**Pembangunan Raya POM**

- **Security Post.** Observation and interview related to work procedure, emergency response facility, OHS, worker welfare and supply chain aspect.
- **Weighbridge Station.** Observations and interviews related to work procedures, worker welfare, OHS, environmental and supply chain aspect.
- **Hydrant Simulation.** Observation and simulation related to fire emergency respond.
- **Grading.** Observations and interviews related to OHS, work procedure and worker welfare aspect.
- **Loading Ramp.** Observations and interviews related to OHS, work procedure and worker welfare aspect.
- **St. Sterilizer.** Observations and interviews related to OHS, work procedure and worker welfare aspect.
- **St. Kernel.** Observations and interviews related to OHS, work procedure, housekeeping, and worker welfare aspect.
- **St. Boiler.** Observations and interviews related to OHS, work procedure, housekeeping, and worker welfare aspect.
- **Engine room.** Observations and interviews related to OHS, work procedure, housekeeping, and worker welfare aspect.
- **Dispatch CPO.** Observations related to related to OHS, work procedure and housekeeping.
- **Chemical Storage.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Material Storage.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Oil Storage.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Workshop.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Hazardous Waste Temporary Storage.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Water Treatment Plant (WTP).** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Empty Bunch Area.** Observations related to material handling, OHS and environmental management.
- **WWTP.** Field observations related to WWTP entry, runoff, effluent testing. Officers are equipped with PPE and effluent discharge records.

**Pembangunan Raya Estate**

- **Harvesting, Block B6 – B11, Division 2.** Observations and interviews related to technical work according to procedures, OHS, worker welfare, environmental and social aspects.
- **Manuring, Block B1 – B2, Division 1.** Observations and interviews related to technical work according to procedures, OHS, worker welfare, environmental and social aspects.
- **Beneficial Plant.** Observations related to the maintenance of beneficial plants (*Turnera subulata* and *Antigonon leptopus*).

- **Fertilizer Storage.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Material Storage.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Agrochemical Storage.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Oil Storage.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **BGA Ground Management System (BGS).** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **BGA Manuring System (BMS).** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Diesel Tank.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Fire Preparedness Utility Storage.** Observation related to implementation of procedure, OHS aspect, and firefighting simulation.
- **Housing Complex.** Observation and interview related to house condition, public facility, OHS aspect, and waste management.
- **Day-care.** Observation and interview related to day-care condition, public facility, OHS aspect, and waste management.
- **Clinic.** Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.
- **Genset House.** Observation and interview with genset operator related to the job description, OHS implementation and worker welfare.
- **Landfill Block A14 Division 3.** Observation and interview related to landfill condition, OHS aspect, and waste management.

### Bengkung Raya Estate

- **Employee Housing Complex.** Observation and interview related to waste management, house condition and infrastructure for the welfare of workers and their family.
- **Daycare.** Observation and interview related to daycare condition, public facility, OHS, worker welfare and waste management.
- **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 B52, Division 3.** Observation related to waste management and environmental aspect.
- **General Storage.** Observation related to storage condition, material stock, OHS and emergency response facility.
- **PPE Storage.** Observation related to storage condition, 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
- **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.
- **Temporary Storage for Hazardous and Toxic Waste Materials in the Workshop.** Observation related to storage condition, hazardous waste stock, OHS, emergency response facility, and waste management.

- **Clinic.** Observation and interview related to clinic condition, treatment mechanisms, OHS, and medical waste management.
- **Land Application at Block D50 D51 Division 3.** Observation of flatbed conditions, indications of POME spills or overflows, and interviews with workers regarding duties, responsibilities and labor aspects.
- **Planting and Upkeep Beneficial Plant at Block C51 C52 C53 Division 3.** Observations and interviews with workers related to work procedures, OHS aspects, employment, complaint mechanisms, and welfare facilities provided.
- **Beneficial Plant (*Turnera subulata* dan *Antigonon leptopus*) at Block D51 D52 D53 E51 E52 E53 Division 3.** Observations related to integrated pest control carried out by the company.
- **Barn Owl Box (*Tyto alba*) at Block E59 Division 4.** Observations related to integrated pest control carried out by the company.
- **Piezometer and Subsidence Pole at Block E64 Division 4.** Observations and interviews with workers related to work procedures, OHS aspects, employment, complaint mechanisms, and welfare facilities provided.
- **Harvesting at Block C51 C52 C53 Division 3, Block F41 F41 Division 2.** Observations and interviews with workers related to work procedures, OHS aspects, employment, complaint mechanisms, and welfare facilities provided.
- **Transport FFB Block C51 Division 3.** Observations and interviews related to technical work, employment aspects, OHS aspects, social aspect, and environment aspect
- **Fertilizer Applications at Block E58 E59 Division 4.** Observations and interviews related to technical work, employment aspects, OHS aspects, social aspect, and environment aspect
- **Chemical Application at Block D50 D51 Division 3.** Observations and interviews related to technical work, employment aspects, OHS aspects, social aspect, and environment aspect
- **EFB Applications at Block D50 D51 Division 3.** Observation of EFB Application, Oryctes attack and environment aspect
- **Ferotrap Applications at Blok D51 Division 3.** Observation of Oryctes attack and environment aspect
- **Discontinuous Ditch at Blok E59 Division 4.** Observation of soil and water conservations

### Belaban Raya Estate

- **Harvesting, Block H68 H69 Division II.** Observations and interviews related to technical work according to procedures, OHS, worker welfare, environmental and social aspects.
- **Spraying, Block H60 Division II.** Observations and interviews related to technical work according to procedures, OHS, worker welfare, environmental and social aspects.
- **Manuring, Block G58 G59 Division I** Observations and interviews related to technical work according to procedures, OHS, worker welfare, environmental and social aspects.
- **Barn Owl Box, G58 Division I.** Observations related to the use of owls as IPM.
- **Fire Tower, Block G55, Division 1.** Observations related to fire emergency response conditions
- **Beneficial Plant.** Observations related to the maintenance of beneficial plants (*Turnera subulata* and *Antigonon leptopus*).
- **Fertilizer Storage.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Material Storage.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Agrochemical Storage.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Oil Storage.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **BGA Ground Management System (BGS).** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **BGA Manuring System (BMS).** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Diesel Tank.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.

- **Fire Preparedness Utility Storage.** Observation related to implementation of procedure, OHS aspect, and firefighting simulation.
- **Housing Complex.** Observation and interview related to house condition, public facility, OHS aspect, and waste management.
- **Day-care.** Observation and interview related to day-care condition, public facility, OHS aspect, and waste management.
- **First Aid Post.** Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.
- **Genset House.** Observation and interview with genset operator related to the job description, OHS implementation and worker welfare.
- **Landfill Block G53 Division 2.** Observation and interview related to landfill condition, OHS aspect, and waste management.

### Agro Seriam Mandiri Cooperative

- **Spraying, Block B21 – B22, Division 3.** Observations and interviews related to technical work according to procedures, OHS, worker welfare, environmental and social aspects.
- **Road Maintenance, Block B13 Division 3.** Observations and interviews related to technical work according to procedures, OHS, worker welfare, environmental and social aspects.
- **Barn Owl Box, Block 12 Division 3.** Observations related to the use of owls as IPM.

### Teluk Rengit Estate

- **Harvesting, Block C23, C24 Division II.** Observations and interviews related to technical work according to procedures, OHS, worker welfare, environmental and social aspects.
- **Spraying, Block B19 B20 Division III.** Observations and interviews related to technical work according to procedures, OHS, worker welfare, environmental and social aspects.
- **Manuring, Block C20 C21 Division III.** Observations and interviews related to technical work according to procedures, OHS, worker welfare, environmental and social aspects.
- **Fire Tower, Block C12, Division 3.** Observations related to fire emergency response conditions.
- **Beneficial Plant.** Observations related to the maintenance of beneficial plants (*Turnera subulata* and *Antigonon leptopus*).
- **Landfill, C20 Divisi III.** Observation related to waste management and environmental aspect.
- **Fertilizer Storage.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Material Storage.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Agrochemical Storage.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Oil Storage.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **BGA Ground Management System (BGS).** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **BGA Manuring System (BMS).** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Diesel Tank.** Observations and interviews related to work procedures, employment systems, OSH, and environmental aspects.
- **Fire Preparedness Utility Storage.** Observation related to implementation of procedure, OHS aspect, and firefighting simulation.
- **Housing Complex Division 3-4.** Observation and interview related to house condition, public facility, OHS aspect, and waste management.
- **Day-care Division 3-4.** Observation and interview related to day-care condition, public facility, OHS aspect, and waste management.

	<ul style="list-style-type: none"> <li>• <b>Clinic.</b> Observation and interview related to implementation of procedure, OHS, worker welfare, and waste management aspects.</li> <li>• <b>Genset House.</b> Observation and interview with genset operator related to the job description, OHS implementation and worker welfare.</li> </ul>
<b>2.3</b>	<b>Stakeholder Consultation and Stakeholders Contacted</b>
<b>2.3.1</b>	<b>Summary of stakeholder consultation process.</b>
	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Agro Sejahtera Manunggal and PT Gunajaya Harapan Lestari was held by:</p> <ul style="list-style-type: none"> <li>• Public Notification on website on 13 February 2023</li> <li>• Public consultation meeting with government institution on 28 February 2023</li> <li>• Public consultation meeting with communities on 1 – 3 March 2023</li> <li>• Public consultation meeting with internal stakeholders and contractor on 1 – 3 March 2023</li> <li>• Public Consultation with NGO (Jikalahari, Perkumpulan Elang, Greenpeace and Sawit Watch) on 21 February 2023.</li> </ul> <p>Numbers of input from stakeholders were clarified by PT Agro Sejahtera Manunggal and PT Gunajaya Harapan Lestari.</p>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	Please find appendix 1
<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit (Recertification) 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 Pembangunan Raya POM – PT Agro Sejahtera Manunggal subsidiary of Bumitama Agri Ltd. operation consisting of one (1) mill, four (4) oil palm estates and one (1) schemeholder.

During the assessment, there were two (2) Nonconformities were assigned against Major Compliance Indicator(s) of 7.12. 4 and 7.8.2; 1 (one) nonconformity were assigned against Minor Compliance Indicators 7.3.1; and two (2) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective action(s) that had been reviewed and accepted by Auditor(s) in form of documentation evidence(s) e.g. document record/photographic.

MUTUAGUNG LESTARI found that Pembangunan Raya POM – PT Agro Sejahtera Manunggal 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 System for Principles and Criteria, 14 June 2017.

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is Continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>		
<b>1.1</b>	<b>The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</b>	
<b>1.1.1</b>	<p>Unit of certification have showed the procedure for providing information to public “<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/informas</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>The procedure above explains the types of information that may be accessed/provided in general and information that is confidential and requires approval from unit of certification management. The procedure also explains the PIC (Person in Charge) responsible for providing information both internally and externally, namely Corporate Affairs Department, Corporate Communication Department, CSR Department, Head of Administration, Human Resources Department and Unit Managers.</p> <p>To ensure that all of this information can be accessed by the public, unit of certification has provided an information and socialization to all relevant stakeholders owned (for examples Seriam Village representatives and contractors). The information provided explains the types of information that can be accessed by the public along with a summary of these documents, this is done to ensure that all stakeholders can access the information publicly or publicly through the letter. Unit of certification have also publicly announced several information on their website (<a href="https://bumitama-agri.com/sustainability/policies-and-reports/">https://bumitama-agri.com/sustainability/policies-and-reports/</a>), including sustainability reports, annual communication reports, and company policies.</p>	



Based on the explanation above, it can be concluded that the certification unit already has the management documents regulated in the RSPO Principles and Criteria available to the public that are well documented.

### 1.1.2

Unit of certification can show records of providing information to relevant agencies in the form of routine reports, for example:

- Report of Analysis of POME Quality for Third Quarter 2022 which was reported to Public Housing, Settlements and Environmental Agency of Ketapang Regency on 16 December 2022.
- Report of Analysis of POME Quality for Fourth Quarter 2022 which was reported to Public Housing, Settlements and Environmental Agency of Ketapang Regency on 30 January 2023.
- Report of Hazardous and Toxic Waste Management PT Agro Sejahtera Manunggal and PT Gunajaya Harapan Lestari for Third Quarter 2022 which was reported to Public Housing, Settlements and Environmental Agency of Ketapang Regency; Public Housing, Settlements and Environmental Agency of West Kalimantan Province; and Ministry of Environment and Forestry with proof of electronic receipt number 1677565211-8426, 1677565158- 8426, and 1677565032-8426 respectively.
- Report of Hazardous and Toxic Waste Management PT Agro Sejahtera Manunggal and PT Gunajaya Harapan Lestari for Fourth Quarter 2022 which was reported to Public Housing, Settlements and Environmental Agency of Ketapang Regency; Public Housing, Settlements and Environmental Agency of West Kalimantan Province; and Ministry of Environment and Forestry with proof of electronic receipt number 1677565431-8426, 1677565375- 8426, and 1677565315-8426 respectively.
- Report of Implementation of Environmental Management and Monitoring Plan PT Agro Sejahtera Manunggal and PT Gunajaya Harapan Lestari of First Semester and Second Semester 2022 which was reported to Public Housing, Settlements and Environmental Agency of Ketapang Regency on 16 December 2022.
- Report of Implementation of Environmental Management and Monitoring Plan PT Agro Sejahtera Manunggal of First Semester 2022 which was reported to Public Housing, Settlements and Environmental Agency of West Kalimantan Province and Ministry of Environment and Forestry with proof of electronic receipt number 1677561633-8206.
- Report of Implementation of Environmental Management and Monitoring Plan PT Agro Sejahtera Manunggal of Second Semester 2022 which was reported to Public Housing, Settlements and Environmental Agency of West Kalimantan Province and Ministry of Environment and Forestry with proof of electronic receipt number 1677561675-8206
- Report of Implementation of Environmental Management and Monitoring Plan PT Gunajaya Harapan Lestari of First Semester 2022 which was reported to Public Housing, Settlements and Environmental Agency of West Kalimantan Province and Ministry of Environment and Forestry with proof of electronic receipt number 1677556092-8207
- Report of Implementation of Environmental Management and Monitoring Plan PT Gunajaya Harapan Lestari of First Semester 2022 which was reported to Public Housing, Settlements and Environmental Agency of West Kalimantan Province and Ministry of Environment and Forestry with proof of electronic receipt number 1677556214-8207.
- Employment Report (*WLTk*) of unit PRYM PT ASM with register number 78862.20220607.0002, reporting date on July 6<sup>th</sup>, 2022, obligation to report back on July 6<sup>th</sup>, 2023.
- Employment Report (*WLTk*) of unit PRYE PT ASM with register number 78862.20220607.0003, reporting date on July 6<sup>th</sup>, 2022, obligation to report back on July 6<sup>th</sup>, 2023.
- Employment Report (*WLTk*) of unit BRYE PT ASM with register number 78862.20220607.0005, reporting date on July 6<sup>th</sup>, 2022, obligation to report back on July 6<sup>th</sup>, 2023.
- Employment Report (*WLTk*) of unit BLRE PT ASM with register number 78862.20220607.0004, reporting date on July 6<sup>th</sup>, 2022, obligation to report back on July 6<sup>th</sup>, 2023.
- Employment Report (*WLTk*) of unit MBNR PT ASM with register number 78862.20220607.0002, reporting date on July 6<sup>th</sup>, 2022, obligation to report back on July 6<sup>th</sup>, 2023.
- Employment Report (*WLTk*) of unit CBNT PT ASM with register number 78862.20220607.0006, reporting date on July 6<sup>th</sup>, 2022, obligation to report back on July 6<sup>th</sup>, 2023.
- Employment Report (*WLTk*) of unit TRNE PT GHL with register number 78862.20221130.0001, reporting date on November 30<sup>th</sup>, 2022, obligation to report back on November 30<sup>th</sup>, 2023.
- Plantation Business Progress Report Third Quarter 2022 PT Agro Sejahtera Manunggal and PT Gunajaya Harapan Lestari to Agriculture, Livestock and Plantation Agency of Ketapang Regency on 7 October 2022.
- Plantation Business Progress Report Fourth Quarter 2022 PT Agro Sejahtera Manunggal and PT Gunajaya Harapan Lestari to Agriculture, Livestock and Plantation Agency of Ketapang Regency on 16 January 2023
- Third Quarter 2022 of OHS Committee of PT. ASM report to Labour Agency Ketapang Regency on 16 Desember 2022

- Fourth Quarter 2022 of OHS Committee of PT. ASM report to Labour Agency Ketapang Regency on 30 January 2023

Based on document review, unit of certification has "*SOP Komunikasi*" No. BGA-SUST-SOP-09 Rev. 00 was approved by Regional Head 2 dated 08 September 2017. 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 in Seriam Village and Pulau Bawal Sub-Village of Kendawangan Kiri Village, and relevant agencies in Ketapang Regency, it is known that they have known the mechanism for communication and request of information with the unit of certification.

### 1.1.3

Unit of certification has shown record of request for information and response given that are listed in log book of internal or external communications and information giving. The document provides information regarding the date and number of the letter, sender, destination, subject of the letter, responses, date of response, and information. Unit of certification will respond the information no later than 15 days after the request is received & submit a copy of the response letter to each unit.

Unit of certification has documented incoming and outgoing letter from external stakeholder in document of "*Buku Surat Masuk dan Keluar*". Based on that document review, there were none of request of information to unit of certification in 2022 and January-February 2023. Incoming letter to unit of certification was in form of request of 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 been shown on Letter on 15 December 2022 No. 11/GMAH Ke7/2022 from *Gereja Masehi Advent Hari Ketujuh* of Kendawangan District about request for assistance for Christ mast and New Year Eve and was responded by unit of certification on 16 December 2022.

Based on interview result with surrounding village representative of Seriam Village and Pulau Bawal Sub-Village of Kendawangan Kiri Village, it was found that unit of certification had conducted socialization to the Village regarding the mechanism for requesting information from unit of certification. If there is a request for information, the village will send a letter or tell the request orally to unit of certification and the response of the request will be provided by the unit of certification. In accordance with this explanation, the unit of certification already has record of request for information and the existing responses have been well maintained and documented.

### 1.1.4

Unit of certification have showed the procedure for providing information to public in "*SOP Komunikasi*" No. BGA-SUST-SOP-09 Rev. 00 was approved by Regional Head 2 dated 08 September 2017. Unit of certification will respond the information no later than 15 days after the request is received & submit a copy of the response letter to the internal unit. The procedure also explains the PIC (Person in Charge) responsible for providing information both internally and externally, namely Corporate Affairs Department, Corporate Communication Department, CSR Department, Head of Administration, Human Resources Department and Unit Managers.

Procedures for consultation mechanisms have been socialized to workers and the surrounding community, as for example socialization was carried out on 04 January 2023 in Pulau Bawal Sub-Village of Kendawangan Kiri Village and participated by 8 participants and on 25 March 2022 in Seriam Village which was participated by 7 participants. Besides, based on field observation result, socialization is carried out in form of banners installment equipped with pictures of consultation and communication flowcharts in unit. Based on the results of consultations with representatives of Seriam Village and Pulau Bawal Sub-Village of Kendawangan Kiri Village, cooperatives 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 shown PT Agro Sejahtera Manunggal and PT Gunajaya Harapan Lestari Stakeholder List document, updated in 09 January 2023. Based on this document, there are over 68 stakeholders related to certification unit which include Government Stakeholders (province, district, sub-district and village), other Authorities, Partner Cooperatives, Vendors, Internal Stakeholders, Contractors, hazardous waste contractor, machineries maintenance in mill and others. The stakeholder register explains the name, agency/position, location, category, contact person number and other information. As for the list of land owners previously owned but in a different document, this information has been included in the Previous Land Owners Document.



At the time the audit was carried out, certification unit Stakeholder List document shown was in accordance with the actual, such as the contact number of each stakeholder contacted by the auditor as stated in the list. Based on this, it can be concluded that the certification unit has an up-to-date list of contacts and detailed information related to stakeholders and their representatives that are well documented.

**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 behavior 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 behavior, narcotics, illegal drugs, gambling and smoking
  - Avoid personal conflicts of interest (insider transactions)
  - Prohibition of giving and receiving gifts, favors or other facilities (including all forms of corruption/bribery/embezzlement of funds).
  - 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 BLRE unit on February 20<sup>th</sup>, 2023, and at the TRNE unit on September 15<sup>th</sup>, 2022. This socialization has also been carried out to external stakeholders, for example on February 22<sup>nd</sup>, 2022, to the Seriam village community and during the morning assembly 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 legality, SCCS, labour, environment, BMP and other aspects. The latest internal audit was carried out on January 15<sup>th</sup> – 26<sup>th</sup>, 2023.

The company also routinely conducts financial audits conducted by auditing public accountants as indicated in the financial statements of PT Agro Sejahtera Manunggal and PT Gunajaya Harapan Lestari 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 behavior in all work operations (code of conduct) 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.

Based on the results of document review and interviews with management representatives, it is known that the mechanism for monitoring compliance in implementing the code of ethics policy is considered to have been effective. From the results of field visits to the sampling unit (estate and mill) it was also discovered that there were no deviations in business practices.

<b>Status: Comply</b>
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## **PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS**

### **2.1**

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

#### **2.1.1**

Unit of certification has list of regulations of 2023 that includes local regulations and national regulation updated annually. List of laws/regulations listed has covers several aspects such as land permit and legality, manpower, occupational health and safety, best management practices and environment. Some examples of regulations compliance that have been done such as:

##### **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.

##### **Worker Welfare Aspect**

- Employment Report (*WLTK*) of unit PRYM PT ASM with register number 78862.20220607.0002, reporting date on July 6<sup>th</sup>, 2022, obligation to report back on July 6<sup>th</sup>, 2023.
- Employment Report (*WLTK*) of unit PRYE PT ASM with register number 78862.20220607.0003, reporting date on July 6<sup>th</sup>, 2022, obligation to report back on July 6<sup>th</sup>, 2023.
- Employment Report (*WLTK*) of unit BRYE PT ASM with register number 78862.20220607.0005, reporting date on July 6<sup>th</sup>, 2022, obligation to report back on July 6<sup>th</sup>, 2023.
- Employment Report (*WLTK*) of unit BLRE PT ASM with register number 78862.20220607.0004, reporting date on July 6<sup>th</sup>, 2022, obligation to report back on July 6<sup>th</sup>, 2023.
- Employment Report (*WLTK*) of unit MBNR PT ASM with register number 78862.20220607.0002, reporting date on July 6<sup>th</sup>, 2022, obligation to report back on July 6<sup>th</sup>, 2023.
- Employment Report (*WLTK*) of unit CBNT PT ASM with register number 78862.20220607.0006, reporting date on July 6<sup>th</sup>, 2022, obligation to report back on July 6<sup>th</sup>, 2023.
- Employment Report (*WLTK*) of unit TRNE PT GHL with register number 78862.20221130.0001, reporting date on November 30<sup>th</sup>, 2022, obligation to report back on November 30<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 Ketenagakerjaan* social security.

##### **BMP Aspect**

- 1<sup>st</sup> Quarter 2022 of *LPUPPT*. ASM to Plantation Agency Ketapang Regency on 15 March 2022
- 2<sup>nd</sup> Quarter 2022 of *LPUPPT*. ASM to Plantation Agency Ketapang Regency on 7 July 2022
- 3<sup>rd</sup> Quarter 2022 of *LPUPPT*. ASM to Plantation Agency Ketapang Regency on 7 October 2022

- 4<sup>th</sup> Quarter 2022 of LPUPPT. ASM to Plantation Agency Ketapang Regency on 16 January 2023
- 1<sup>st</sup> Quarter 2022 of LPUPPT. GHL to Plantation Agency Ketapang Regency on 15 March 2022
- 2<sup>nd</sup> Quarter 2022 of LPUPPT. GHL to Plantation Agency Ketapang Regency on 7 July 2022
- 3<sup>rd</sup> Quarter 2022 of LPUPPT. GHL to Plantation Agency Ketapang Regency on 7 October 2022
- 4<sup>th</sup> Quarter 2022 of LPUPPT. GHL to Plantation Agency Ketapang Regency on 16 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> Quarter 2022 of OHS Committee of PT. ASM report to Labour Agency Ketapang Regency on 17 June 2022
- 2<sup>nd</sup> Quarter 2022 of OHS Committee of PT. ASM report to Labour Agency Ketapang Regency on 05 September 2022
- 3<sup>rd</sup> Quarter 2022 of OHS Committee of PT. ASM report to Labour Agency Ketapang Regency on 16 December 2022
- 4<sup>th</sup> Quarter 2022 of OHS Committee of PT. ASM report to Labour Agency Ketapang Regency on 30 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

- AMDAL document for plan to develop plantation and palm oil mill of PT Agro Sejahtera Manunggal with plantation area of 7,670 Ha with Mill Capacity of 45 Tons FFB/Hour in 2010. The document has obtained environmental feasibility according to Decree of Governor of West Kalimantan Number 560 /BLHD/2010 on 13 December 2010. In 2018, PT Agro Sejahtera Manunggal made an AMDAL Addendum to PT Agro Sejahtera Manunggal Plantation and Palm Oil Mill with a plantation area of 7,670 Ha, Capacity Increase from 45 Ton FFB/Hour to 60 Ton FFB/Hour and construction special terminal area of 5.41 Ha. From the AMDAL Addendum, PT Agro Sejahtera Manunggal has obtained an environmental permit based on Decree of Regent of Ketapang Regency Number 049/DPMPTSP-D.B/2018 on 9 February 2018.
- AMDAL Documents Oil Palm Plantation Activities (Area: ± 3,000 ha) by PT Gunajaya Harapan Lestari in Ketapang Regency, West Kalimantan Province issued by Governor of West Kalimantan on 13 August 2012 with number 467/BLHD/2012. The scope of this document is an oil palm plantation of ± 3,000 Ha.
- Wastewater Utilization Permit based on Decree of Ketapang Regent number 256/DPMPTSP-D.B/2019 dated 8 May 2019 concerning Permit for Utilization of Wastewater to Soil for Application on Soil at the Oil Palm Plantation of PT Agro Sejahtera Manunggal covers an area of 282.31 Ha (28 Blocks) located in Kendawangan District, Ketapang Regency. The decision is valid for 5 (five) years.
- Permit for Temporary Storage of Hazardous and Toxic Waste PT Agro Sejahtera Manunggal in accordance with Decree of the Regent of Ketapang number 1491/DPMPTSP-D.B/2017 dated 13 December 2017 which is valid for 5 years. Company has shown progress of extension of this permit based on evidence of meeting with Ministry of Environment and Forestry on 20 January 2023. Based on this meeting, this permit is on progress of validation from Ministry of Environment and Forestry since then.

#### 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*. Based on this internal audit the UoC/third parties complied with the latest regulations, such as Pay slips for contractor workers PT Suri Adidaya Kapuas with the initials FK who received a basic wage in December 2022 of IDR 2,876,252

**2.1.3**

The company has a map that showing the location of the boundary poles in each estate. The company has also monitored HGU boundary pole in January 2023 by showing the results of monitoring record "*Formulis Berita Acara Pengamatan Patok HGU*" in accordance with the maintenance procedures (GKG-GKS-GIS-SOP-01, 10 November 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. ASM15 & ASM16 (Bengkuang Raya Estate), No. ASM01 & ASM83 (Pembangunan Raya Estate) and No. GHL14 & GHL 13 (Teluk Rengit Estate) are found and that the condition of the boundary poles is well maintained.

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

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

**2.2.1**

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 CPO and PK transporters, hazardous and toxic waste contractors, etc. The unit of certification has shown a list of contractors for the 2023 period, which are as follows:

- CV Kawira Putra, Cooperation in CPO transportation.
- PT Suri Adidaya Kapuas, Cooperation in PK transportation.
- PT Semesta Langgeng Sentosa, Cooperation in the transportation of hazardous and toxic waste.
- Cooperative Agro Seriam Mandiri, Cooperation in FFB suppliers.
- Local contractor on behalf of Burhanudin, Cooperation in barge charter.

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

- Work agreement letter number 001/WIL-7A/ASM/SPK/VI/2022 between CV Kawira Putra and PT ASM for the work of transporting CPO. The work agreement is valid from June, 2022, until June, 2023.
- Work agreement letter number 01/SPK-ASM/VIII/2010 between Cooperative Agro Seriam Mandiri and PT ASM for the supply of FFB. The work agreement is valid for 25 years from the signing of the work agreement.
- Work agreement letter number 000-ANGKT/GHLL-TRNE/LKL/01/2023 between Burhanudin and PT GHL for the work of transporting CPO. The work agreement is valid from January 1<sup>st</sup> – December 1<sup>st</sup> 2023.

The work agreement document displayed contains unit of certification information including name acting as management representative and company address, contractor information in the form of representative name and contractor address, unit of company/contractor rights and obligations, term of work agreement, work location, monitoring, appraisal and payment as well sanctions and settlement of disputes, etc.

**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 CV Kawira Putra number 001/WIL-7A/ASM/SPK/VI/2022 dated June 8<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. In addition, the company also has a contractor procedure number SUST-SOP-038 dated 1 July 2022, which regulates the selection and evaluation of contractors who work with the company.

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

- Pay slip for contractor worker CV Kawira Putra with the initials ZK who received a basic wage in December 2022 of IDR 2,876,252.
- Pay slips for contractor workers PT Suri Adidaya Kapuas with the initials FK 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. The payment for the health program is fully borne by the government.

Based on the results of interviews with local contractors, information was obtained that once a year the unit of certification has conducted outreach regarding OHS, use of PPE at work, 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 PK transport work agreement letter number 001/WIL-7A/ASM/SPK/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 Ketenagakerjaan* and *BPJS Kesehatan*, do not employ children under the age of 18, do not practice forced labor and illegal labor. Then based on interviews with the contractor, information was obtained that the contractor representative could explain related to several prohibitions in accordance with labor laws such as the prohibition on the use of underage labor, forced labor and human trafficking.

As a form of compliance with the implementation of the clauses contained in the work agreement, the certification unit evaluates the contractor's performance as outlined in the Contractor Evaluation Form. The criteria assessed in the evaluation are the availability of operational access, product quality, vehicle condition and driving rules, compliance with employment (wages, age, BPJS and workers' insurance) and fulfillment of HSE requirements (PPE and OHS rules in the company). For example, the work evaluation document for contractor PT Suri Adidaya Kapuas with work agreement letter number 001/WIL-7A/ASM/SPK/IV/2022 for the assessment period in February 2023, 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, for example:

No	FFB Supplier	Remarks	Geo Tagging Location
1	PT. Gunajaya Harapan Lestari	62/HGU/KEM-ATR/BPN/2016	X = 110.0977955 Y = -2.72450592
2	Koperasi Bawal Sejahtera Mandiri	NIB: 14.07.00.00.00244	X = 110.0897622 Y = -2.74353971
3	PT. Gunajaya Ketapang Sentosa	85/HGU/BPN-RI/2011	X = 110.3441266 Y = -2.49682703
4	Koperasi Fajar Mandiri (PT.GKS)	06/ SPK-KOP.BUN/ FM/ X /2010	
5	Kelompok Tani Sawit Maju Sejahtera	SHM (322) NIB: 14.07.09.16.00322	X = 110.383108 Y = -2.548846
6	PT. Agro Sejahtera Manunggal	28/HGU/BPN RI/2013	X = 110.0977955 Y = -2.72450592
		52/HGU/KEM-ATR/BPN/2018	
7	Koperasi Agro Seriam Mandiri	51/HGU/KEM-ATR/BPN/2015	X = 110.2944021 Y = -2.54402685

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 2022/2023 period, it is known that the company not received FFB from collectors.

**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**

Pembangunan Raya POM consists of 2 supply bases namely PT. ASM and PT. GHL. The company shows a timed planning record at PT. ASM and PT. GHL, namely short term, medium term and long term plans to produce sustainable palm oil for the period 2023 to 2027:

DESCRIPTION	2023 (Ton)	2024 (Ton)	2025 (Ton)	2026 (Ton)	2027 (Ton)
<b>PT. ASM</b>					
TBS	230,415	230,353	225,516	231,044	23,691
CPO	57,604	57,588	56,379	57,761	59,198
Kernel	9,677	9,675	9,472	9,704	9,945
<b>PT. GHL</b>					
TBS	73,265	74,745	80,046	85,649	84,762
CPO	18,316	18,686	20,012	21,412	21,190
Kernel	3,077	3,139	3,362	3,597	3,560

The Unit of Certification has also carried out a financial audit at PT. ASM as outlined in the financial audit report for the period December 31<sup>st</sup>, 2021 Number 00236/2.1032/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. Agro Sejahtera Manunggal 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.

As for the financial audit of PT. GHL for the financial year for the period December 31<sup>st</sup>, 2021 is set forth in the financial audit results report Number 00055/2.1035/AU.1/01/1164-4/1/III/2022 on March 21<sup>st</sup>, 2022 which was conducted by the Public Accounting Firm with an opinion The attached financial statements present in full fairly, in all material respects, the financial position of PT. Agro Sejahtera Manunggal 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

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 area statement data, PT. ASM and PT. GHL has planting years between 2009 and 2014. 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, which is around 2034

**3.1.3**

The Unit of Certification conducts management reviews on a regular basis, both at the Estate and at the POM, including an annual management review to evaluate the previous year's operations. Management reviews, among others, were carried out at PYRM, PYRE, BLRE, BRYE and TRNE to evaluate the achievement of work results in 2022.

In November 2022 OER achievement of 23.07 from Budget 24.50% (minus 1.43%). This was due to, among other things, a decrease in Ripeness compared to the previous month, namely 76.32% to 75.22%, a decrease in contamination from 1.27% to 0.92%, a decrease in normal loose looseness from 54.65% to 58.48% and a decrease in rainfall from 31 mm to 306 mm.

In 2023 BSRE has a target of 79,858 tons of FFB production with a yield of 33.59 tons/ha by maintaining adequacy of harvesting workers, improving soil moisture, ground management and canopy management, excellent bio waste management (empty bunches and boiler ash), as well as accelerating areas need improvement. PYRM has an OER improvement program including repairing the steam coil CST 1 and 2, adding a thermocouple valve system inlet digester, installing auto position air venting, and placing operators to increase supervision in the field.

In addition, on February 25<sup>th</sup>, 2023 there was a management review of the RSPO, RSPO SCCS and ISPO PT. ASM and PT. GHL which discusses operational issues and corrective actions that will be carried out according to the person in charge and the specified time limit. For example, the certification unit evaluates process performance at PYRM and takes corrective action through providing operational control training, implementing factory maintenance and housekeeping programs, and regular inspections of tests and tests of raw materials in process and final products by the QC Department.

The unit of certification also evaluates related to the replanting program, that there is no replanting plan within the next 5 years because at PT. ASM and GHL, the oldest plants are 13 years old.

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

<b>Status: Comply</b>
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### 3.2

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

#### 3.2.1

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

- Companies no longer use 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 Environmental Agency.
- Management and monitoring of air quality through several actions such as road maintenance, air quality testing, routine vehicle and engine maintenance and vehicle upgrades.
- Management and monitoring of surface water and ground water through testing of quality standards.
- Management of Greenhouse Gases and use of land clearing with a mechanical policy and no burning.
- Drilled wells to meet the needs of clean water provided for employee housing
- Special health checks that are carried out regularly.
- Making ditches discontinue on sandy areas to maintain the availability of water in the field
- Soil analysis and leaf analysis to identify soil and plant conditions
- Monitoring water level and piezometer to maintain the rate of decline in peat soil subsidence
- Do not use fire in operational management in the field

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 2022 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.		
	<b>Status: Comply</b>	
<b>3.3</b>		
<b>Operating procedures are appropriately documented, consistently implemented and monitored.</b>		
<b>3.3.1</b>		
<b>Oil Palm Agronomy Procedures</b>		
There is no revision on the current procedure of oil palm agronomy since issued by company Director on 25 May 2011. The procedure consist of three volume, as follows:		
<ul style="list-style-type: none"> <li>Volume I has covers nursery (BGAAGRKS-SOP-01), land preparation (BGAAGRKS-SOP-02), installation and maintenance of road and bridge (BGAAGRKS-SOP-03), installation and maintenance of drainage system (BGAAGRKS-SOP-04), conservation of water and soil (BGAAGRKS-SOP-05), planting of legumes or land cover crop (BGAAGRKS-SOP-06) and planting of oil palm (BGAAGRKS-SOP-07).</li> <li>Volume II has covers weeds management control (BGAAGRKS-SOP-08), manuring or fertilizer application (BGAAGRKS-SOP-09) and integrated pest management (BGAAGRKS-SOP-10).</li> <li>Volume III has covers castration and canopy management (BGAAGRKS-SOP-11), census of palms and FFB production (BGAAGRKS-SOP-12), harvesting (BGAAGRKS-SOP-13), pesticide management (BGAAGRKS-SOP-14), transportation management (BGAAGRKS-SOP-15), marginal soil management (BGAAGRKS-SOP-16) and replanting (BGAAGRKS-SOP-17).</li> </ul>		
Furthermore, estate management also has procedure on RSPO supply chain management and FFB traceability which presented in document No. BGA-SOP-GKG-0415-29-RO. Delivery Letter of FFB from RSPO certified areas will be marked by RSPO Logo.		
<b>Oil Palm Processing Procedure</b>		
There is no revision on the current procedure of oil palm processing technique since issued by COO, CSO and CFO on 17 January 2013. The procedure consist of three (3) volume, as follows:		
<ul style="list-style-type: none"> <li>Volume I have covers Weighbridge (BGA-SOP-OP-1001.1-RO).</li> <li>Volume II has covers technical matters on several stations such as 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 Power Supply (BGA-SOP-OP-1002.8).</li> <li>Volume III has covers technical matters on several stations such as 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), Mill Maintenance (BGA-SOP-OP-1002.13) and Mill Laboratory (BGA-SOP-OP-1002.14).</li> </ul>		
<b>Safety Aspect Procedure</b>		
Unit of certification has safety procedure as follows:		
<ul style="list-style-type: none"> <li>Material Safety Data Sheet (MSDS) of pesticide products.</li> <li>Hazard Identification Risk Assessment Control (HIRAC).</li> </ul>		
Based on procedure documents review, it could be concluded that the oil palm agronomy, processing and safety procedures are still relevant with current situation and covers all main aspects from the field to the factory. All procedures are available in Bahasa.		
<b>3.3.2</b>		
Based on interviews with management, it is known that there are procedures to monitor the implementation of SOPs consistently, there are SOPs for Quality Assurance which consist of:		
<ul style="list-style-type: none"> <li>BGA-IA-700 Procedure – Investigation Audit</li> <li>ASM-AQA-SOP-001 Standard notification of inspection</li> <li>ASM-AQA-SOP-002 Quality of Harvesting quality</li> <li>ASM-AQA-SOP-003 Fruit Quality</li> <li>ASM-AQA-SOP-004 Quality Transport</li> <li>ASM-AQA-SOP-008 Grading TPS</li> <li>ASM-AQA-SOP-001 Fertilization and Chemist Application Inspection</li> </ul>		
The Unit of Certification has conducted an internal audit on January 15 <sup>th</sup> -26 <sup>th</sup> , 2023 at PT. ASM found 6 discrepancies and these		



discrepancies were repaired on February 7<sup>th</sup>, 2023. These discrepancies included the certification unit not being able to show the 2022 HIRAC evaluation, the paint for the HCV boundary marker block F57 had faded and the shower was not functioning at TPS LB3 PYRM.

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

### 3.3.3

Unit of certification 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.

For example, PT. ASM unit BRYE evaluates losses and FFB production. Unit of certification takes corrective actions, namely consistently carrying out QC from the foreman to the manager, carrying out QC on problem areas and implementing harvest fines consistently

In addition, there is an evaluation related to fertilization productivity at PT. GHL on TRNE unit to maximize the use of the Spreader Fertilizer and increase the fertilization workforce into 6 groups with an average output of 750 Kg/HK so that the minimum target is 15 tons/day.

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

The 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:

#### Social Impact Assessment

- Social Impact Assessment (SIA) study in collaboration with the Faculty of Forestry, IPB in 2011, the results of which were included in the Social Impact Assessment Report (SIA) of PT Agro Sejahtera Manunggal, West Kalimantan Province in 2011 with the scope of the study covering the 2007 location permit area with an area of 8,000 hectares. The study was conducted on the social impact on the residents of Seriam Village and on the employees of PT. ASM. FGD related to the SIA study was conducted in Badak Bathing Hamlet on April 22, 2011 which was attended by 9 participants, in Tanjung Balai Hamlet on April 22, 2011 attended by 7 participants, the FGD in Mangkul Hamlet was held on April 21, 2011 followed by 29 participants and FGD with employees was held on 21 April 2011 attended by 47 participants.
- Social Impact Assessment PT Gunajaya Harapan Lestari with the Faculty of Forestry, IPB in 2011, the results of which were included in the Social Impact Assessment Report (SIA) of PT Gunajaya Harapan Lestari, West Kalimantan Province in 2011 with the scope of the study covering the 2007 location permit area with an area of 3,000 hectares.

#### Environmental Impact Assessment

- AMDAL document for plan to develop plantation and palm oil mill of PT Agro Sejahtera Manunggal with plantation area of 7,670 Ha with Mill Capacity of 45 Tons FFB/Hour in 2010. The document has obtained environmental feasibility according to Decree of Governor of West Kalimantan Number 560 /BLHD/2010 on 13 December 2010. In 2018, PT Agro Sejahtera Manunggal made an AMDAL Addendum to PT Agro Sejahtera Manunggal Plantation and Palm Oil Mill with a plantation area of 7,670 Ha, Capacity Increase from 45 Ton FFB/Hour to 60 Ton FFB/Hour and construction special terminal area of 5.41 Ha. From the AMDAL Addendum, PT Agro Sejahtera Manunggal has obtained an environmental permit based on Decree of Regent of Ketapang Registry Number 049/DPMPSTSP-D.B/2018 on 9 February 2018.

- AMDAL Documents Oil Palm Plantation Activities (Area:  $\pm 3,000$  ha) by PT Gunajaya Harapan Lestari in Ketapang Regency, West Kalimantan Province issued by Governor of West Kalimantan on 13 August 2012 with number 467/BLHD/2012. The scope of this document is an oil palm plantation of  $\pm 3,000$  Ha.

#### **HCV Assessment**

- Final Report of Identification and Analysis of Existence of High Conservation Values (HCV) in PT Agro Sejahtera Manunggal which was compiled in October 2012. The study was conducted by the HCV Team of Faculty of Forestry of IPB using the guideline for Identification of High Conservation Value Areas in Indonesia July 2008 with date field data collection on 20-25 April 2011. Based on the identification results, it was found that the area of HCV was 125,921 Ha consisting of river/ditch riparian areas, conservation areas, peat areas  $>3$  m, and sacred places.
- Report of Analysis and Identification of Existence of High Conservation Values (HCV) in PT Gunajaya Harapan Lestari which was compiled in October 2012. The study was carried out by the HCV Team of the Faculty of Forestry IPB using the guideline for Identification of High Conservation Value Areas in Indonesia July 2008 with date of field data collection on 19-25 April 2011. Based on the results of the identification, an area of 290 hectares of HCV was obtained consisting of rivers, coastal & mangrove ecosystem buffers, swamps, and hills.

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 Aspect**

- Social Impact Assessment PT Agro Sejahtera Manunggal conducted by the Lingkar Komunitas Sawit (LINKS) in 2018. This social impact assessment is conducted to see whether the issues identified in the 2011 social impact assessment are still relevant to current actual conditions. In addition, the 2018 social impact assessment is to review the implementation of the SIA management plan and monitoring activities that have been carried out by the company. The 2018 social impact assessment data collection process was carried out on 14-18 December 2018 and the final report was completed in March 2021. The 2018 social impact assessment process involved affected stakeholders such as surrounding communities, workers, staff, plasma farmers, and contractors. The company has prepared a management and monitoring plan for the SIA 2021-2023 in accordance with the results and the final report of the 2018 social impact assessment which was prepared in March 2021.
- Social Impact Assessment PT Gunajaya Harapan Lestari with the Faculty of Forestry, IPB in 2011, the results of which were included in the Social Impact Assessment Report (SIA) of PT Gunajaya Harapan Lestari, West Kalimantan Province in 2011 with the scope of the study covering the 2007 location permit area with an area of 3,000 hectares.

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 have 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 14-18 December 2018. The event was attended, among others, by head of villages, community leaders, public heath 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 resolving tenure issues around the company, improve plasma performance, community economic improvement, improving the quality of public education, counselling and improving the quality of public health, communication and networking with all stakeholders, increase the availability of clean water, employment improvement, improve labor facilities.

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 Badak Berendam Sub-Village of Seriam Village and Pulau Bawal Sub-Village of Kendawangan Kiri 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 Aspect**

Implementation of environmental monitoring and management plan are documented on periodical report of environmental monitoring and management implementation report for PT Agro Sejahtera Manunggal and PT Gunajaya Harapan Lestari. 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 Badak Berendam Sub-Village of Seriam Village and Pulau Bawal Sub-Village of Kendawangan Kiri 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.

Based on document verification and the results of field visits, it is known that the environmental management and monitoring plan that has covered all of the company's operational activities.

#### **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 result of interview with representatives of Badak Berendam Sub-Village of Seriam Village and Pulau Bawal Sub-Village of Kendawangan Kiri 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
- SOP Recruitment of Non-Staff Employees number BGA-SOP-HC-304.08-R0
- SOP Employee Promotion number BGA-SOP-HC-307.1-R1 Revision 1
- Intern Office Memo number 001/MEMO-BGA/HC-BCU/1/2023 which explains the promotion of internal employees through training programs
- Pension procedures contained in CHAPTER II PT ASM Company Regulations for the period 2021 - 2023
- Procedures for Termination of Employment as contained in CHAPTER VIII PT ASM Company Regulations for the period 2021 - 2023

Routine socialization regarding procedures and Company Regulations is given to workers. For example, socialization at the PRYE unit which was held on October 10<sup>th</sup>, 2022, and during morning assembly in each unit before starting work. 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
  - PRYM: An employee with the initials IR sends a letter of application on July 19<sup>th</sup>, 2022, and attaches identification documents (copy of e-KTP, family card, graduation/last education certificate, etc.). Workers are accepted to work as permanent daily workers on condition that they undergo a probationary period of 3 months. The unit of certification shows SPK for permanent daily workers number 001/SPK-PKWTT/7A-ASML/PRYM/VIII/2022 which explains that workers with the initials IR are accepted as logistics admins on August 3<sup>rd</sup>, 2022.
  - PRYE: An employee with the initials TB sends a letter of application by attaching identity documents (copy of e-KTP, family card, last diploma/diploma, etc.). Workers are accepted to work as permanent daily workers on condition that they undergo a probationary period of 3 months. Then, the certification unit shows the decree on appointment of permanent daily workers

number 468/SK/ASM/-PRYE/II/2023 which explains that workers with the initials TB are accepted as harvesters on January 31<sup>st</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.

- Promotion for workers with the initials AB (Speed Operator) listed in decree number 004/SK-PTB/Wil-7/HRD/VI/2022 dated June 1<sup>st</sup>, 2022. The document explains that workers are promoted from *PTH* to *PTB – P1*. The company also shows the results of the employee performance appraisal with the initials AB with the evaluation criteria of morality, capability, integrity and presence which form the basis for consideration of employee promotions.
- Workers' retirement documents with the initials EP listed in the Memo number 0139/MEMO-AREA-7A/AC-7A/III/2022 dated March 7<sup>th</sup>, 2022. The document explains that workers have entered retirement age so that from April 8<sup>th</sup>, 2022, is no longer registered as an employee at BRYE unit (PT ASM). 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 and S) plan is documented, effectively communicated and implemented.**

##### 3.6.1

Unit of certification shows the results of risk identification in PYRM, PYRE, BLRE, BRYE and TRNE. For example, there is a Hazard Identification and Risk Assessment document at PT. ASM and PT. GHL which was compiled on January 28<sup>th</sup>, 2023. 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, warehouses for Toxic and Hazardous materials chemicals and Toxic and Hazardous materials waste, diesel tanks, laboratories, offices, CPO despatch, installation of machine units, fire fighting, vehicle traffic within the factory and others.

In addition, the unit of certification has identified risks and potential hazards in PYRE, BLRE, BRYE and TRNE, including those related to EFB, FFB transportation, transportation, fertilizer transportation, vehicle maintenance, heavy equipment operations, storage of goods in warehouses, fertilizing, transportation, spraying chemicals, harvesting, transporting FFB, land clearing, Plant Pest census, monitoring land fires, housing, offices, etc.

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 PYRM has covered all operational activities in the field

The unit of certification has conducted socialization related to this company policy to employees and stakeholders including the OHS Policy Socialization on 21 February 2023 at the BLRE which was attended by 33 employees and on 05 December 2022 at PYRE which was attended by 54 employees. This socialization includes explaining the rights and obligations of employees, K3, potential occupational hazards, and the importance of using PPE.

The company also has procedures related to OHS and has been approved by the company leadership, including:

- SOP for Emergency Preparedness and Response (BGA-SUST-SOP-25). issued on 12-05-2018 with the aim of providing guidance in carrying out management and prevention of emergencies as well as recovery efforts, both those affecting humans, the environment or work activities/processes, SOP was endorsed by Regional Head 4A
- SOP for PPE Control (BGA-SUST-SOP-18, issued on 12-05-2018 with the aim of providing guidance on managing the personal protective equipment used. SOP was endorsed by Regional Head 4A
- SOP for Aspects and Hazards Identification (BGA-SUST-SOP-03) issued on 12-05-2018 with the aim of ensuring all aspects of impact and hazard risks in the workplace are completely identified and ensure all identified impacts and risks are assessed systematically and consistent. SOP is endorsed by Regional Head 4A



- SOP for Forest and Land Fire Control (BGA-SOP-EM-1105.5), dated 3-05-2021 with the aim of regulating and providing clear guidelines in the implementation of land and forest fire control processes. The SOP is endorsed by the COO/Director of CAP/CFO

Based on the description above, it shows that all operational activities risks assessed to identify the OHS issues. Mitigation plans and procedures are documented and implemented.

### 3.6.2

Unit of certification monitors the effectiveness of the implementation of the OHS plan which is carried out to manage OHS risks for employees, including by evaluating the implementation of the OHS program, HIRAC evaluation at least once a year, OHS inspections, inventory of emergency response facilities and infrastructure, monthly pregnancy checks, installation of OHS infrastructure, accident investigations work, repair and maintenance programs in plantations and factories, inspections for compliance with the use of PPE which are carried out every month, monitoring employee health status through special health checks and periodic health checks, giving multivitamins to harvesters. For example, there is the provision of multivitamins for the period March 2022 to February 2023 at PT. ASM and GHL. In addition, the certification unit routinely makes quarterly OHS reports including OHS Committee reports which are reported to the Office of Manpower and Transmigration once every 3 months. The unit of certification also routinely conducts OHS Committee meetings once every 1 month to evaluate plans and realization of work programs in plantations and factories.

Based on the description above, it shows that the effectiveness of the OHS plan to address health and safety risks to people is monitored

**Status: Comply**

### 3.7

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

#### 3.7.1 and 3.7.2

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:

- Training on work techniques (harvest, spraying, manuring, pruning, etc), pest and disease census, limited pesticide use training, supply chain requirements, first aid, OHS, PPE, HIRAC, fire simulation, fire extinguisher, hazardous toxic and waste, and company policy for plantation workers.
- Training on operator work techniques (OHS training of steam aircraft, production aircraft, welders, etc), first aid, PPE, HIRAC, fire extinguisher, emergency response, and company policy for factory workers.
- Training and socialization of RSPO, ISPO, company policy and communication and complaint procedures for contractor workers, smallholders, stakeholders and communities around the company.

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

- Steam Aircraft Occupational Training which was held on August 29<sup>th</sup> – September 3<sup>rd</sup>, 2022, and was attended by 2 steam aircraft operators at PRYM unit.
- Drain Clarifier Tank Training which was held on November 17<sup>th</sup>, 2022, and was attended by WTP operators at PRYM unit.
- Simulation of pruning work which was carried out on August 11<sup>th</sup>, 2022, and was attended by 17 harvest workers at BRYE unit.
- Simulation of spray work which was carried out on October 25<sup>th</sup>, 2022, and was attended by 15 spray workers at BRYE unit.
- Simulation of harvest work which was held on February 3<sup>rd</sup>, 2022, and was attended by 41 harvest workers at PRYE unit.
- Simulation of fertilizer work which was held on February 8<sup>th</sup>, 2022, and was attended by 27 fertilizer workers at PRYE unit.
- Socialization of HIRAC which was held on August 4<sup>th</sup>, 2022, and was attended by 100 workers at CBNT unit.
- Socialization of fire extinguishers which was held on September 7<sup>th</sup>, 2022, and was attended by 100 workers at CBNT unit.
- Socialization of OHS which was held on November 7<sup>th</sup>, 2022, and was attended by 52 harvest workers at BLRE unit.
- MSDS training which was held on September 27<sup>th</sup>, 2022, and was attended by 28 spray workers at BLRE unit.
- Socialization of HIRAC which was held on February 7<sup>th</sup>, 2022, and was attended by 16 spray workers at TRNE unit.
- Socialization of company regulations which was held on July 21<sup>st</sup>, 2022, and was attended by 20 fertilizer workers at TRNE unit.
- Socialization of RSPO/ISPO principles and criteria, company policies as well as communication and complaints procedures which were held on January 4<sup>th</sup>, 2023, and attended by 10 external stakeholders.

Based on the results of interviews with workers, contractors and village community representatives (Seriam 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 B66 – B70 BLRE unit stated that all harvest workers had received training on how to harvest.

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

### 3.7.3

UoC showed that they had properly documented every training activity and socialization that had been carried out to all workers, contractors, and related stakeholders. The training of SCCS had been conducted on 25 February 2023 for weighbridge operator, laboratory, and admin. Based on the interview with all workers involved in supply chain operations, such as security (for FFB receiving verification), weighbridge operator, and the PIC related to supply chain, they have been understood the supply chain mechanism, and the MB record has conducted and monitored quite well.

**Status: Comply**

## 3.8

### Supply Chain Requirements for Mills

#### 3.8.1; 3.8.2

Pembangunan Raya 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 Pembangunan Raya 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)	156,000	139,015	168,700
CPO Production	37,181	31,862	38,800
Palm Kernel (PK) Production	7,830	6,707	8,100

#### 3.8.4

The Mill have been registered in RSPO Palm Trace as Pembangunan Raya Mill, PT Agro Sejahtera Manunggal with License ID CB139461, and Member ID RSPO\_PO1000004866

Whole transaction of CSPO/CSPK has been declared in RSPO IT Platform (License Period September 2022 to March 2023). Related to CSPK transaction, auditee informs that there's CSPK sold as physical as amount as 800.55 MT and there's CSPO sold as credit as amount as 10,000 MT.

The auditors verify related to transactions on the Palmtrace platform with actual sales of certified products, for example of transaction record In 4 to 12 October 2022, where there was a sale of 300.81 ton (41 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 11 November 2022 and confirmed by the recipient on 15 November, 2022.

#### 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 15 – 16 January 2023 for all business unit (Estate and Mill) and there is one non-conformity related to supply chain indicators. The finding concerns that SCCS training has not been given to any of the personnel at the factory. The company took corrective action regarding this matter on February 25, 2023 with evidence of SCCS internal training activities documentation.

**3.8.7**

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

Period	Total FFB Received	FFB Received	
		Un Certified	Certified
Feb-22	25,274.48	18,059.61	7,214.87
Mar-22	36,404.24	26,132.38	10,271.86
Apr-22	39,777.58	21,569.34	18,208.24
May-22	34,303.93	19,906.32	14,397.61
Jun-22	34,285.29	19,332.93	14,952.36
Jul-22	32,941.17	18,762.02	14,179.16
Aug-22	33,027.18	20,229.87	12,797.31
Sep-22	25,978.06	16,085.86	9,892.20
Oct 2022	23,102.77	13,609.63	9,493.14
Nov 2022	22,528.93	13,103.31	9,425.62
Dec 2022	23,168.78	13,418.83	9,749.95
Jan-23	20,329.55	11,896.01	8,433.54
<b>Total</b>	<b>351,121.96</b>	<b>212,106.10</b>	<b>139,015.86</b>

Based on that 12-months record of FFB received on Pembangunan Raya POM, there's total certified FFB as amount as 139,015.86 ton.

The company does not apply for additional production of certified products, because it has not exceeded the volume on the RSPO platform, here are the details:

Product	Certified Volume (April 2022 to March 2023)	Actual Certified Volume from April 2022 to March 2023
<b>CSPK</b>	6,250	5,821
<b>CSPO</b>	30,000	27,773
<b>FFB</b>	125,000	121,529

Regarding the control of uncertified products, the mechanism is contained in document No. BGA-SUST-SOP-44 dated 16 December 2020.

**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 in 12 October 2022 with information:

- Quantity : 7,680 kg
- Seal Number : 210809552-210809553
- Time : 01:20 WIB
- Weighbridge Card : A2122159469
- Driver : Sarjono
- No. Police : KB 8896 ZL
- FFA : < 5,00
- Material Transport Permit No. : 0087/SIPB/ASML/2022
- Buyer : PT Andes Agro Investama

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 are 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 contractor for CPO and PK transport, for instance as shows through several Work Order Letter as follows:

- PT Suri Adidaya Kapuas (PK transporter), agreement No. 001-WIL 7A/ASM/SPK/VI/2022 dated June 2022 valid thru June 2023.
- CV Kawira Putra (CPO transporter), agreement No. 001-WIL 7A/ASM/SPK/VI/2022 dated June 2022 valid thru June 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 and CV Kawira Putra, where he stated that he was ready to be audited by a third party regarding the RSPO.

### 3.8.12

Pembangunan Raya 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	CPO Dispatch (MT)		
	Cert	Non Cert		Physical	Other Scheme	Non Cert
Feb 2022 to Jan 2023	31,862	48,724.52	80,586.96	-	-	26,625.48

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

#### Palm Kernel

Period	PK production (MT)		Total	Cert PK Dispatch (MT)		
	Cert	Non Cert		Physical	Credit	Non Cert
Feb 2022 to Jan 2023	6,940	10,263.70	16,971.49	1,996.51	-	4,721.42

Based on record verification, there's CSPK sold as certified product on license period (Feb 2022 to Jan 2023) as amount as 1,996.51 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. Based on that explanation, extraction rate calculated by industry average. 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: Pembangunan Raya Mill, PT Agro Sejahtera Manunggal
- Membership No.: 1-0043-07-000-00 (Bumitama Agri Ltd)
- Member ID: RSPO\_PO1000004866
- License ID: CB139461

Whole transaction of CSPO/CSPK has been declared in RSPO IT Platform (License Period September 2022 to March 2023). Related to CSPK transaction, auditee informs that there's CSPK sold as physical as amount as 800.55 MT and there's CSPO sold as credit as amount as 10,000 MT.

From shipping announcement verification, known that shipping announcement carried out not more than 3 months after dispatch. For example, in 4 to 12 October 2022, where there was a sale of 300.81 ton (41 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 11 November 2022 and confirmed by the recipient on 15 November, 2022.

### 3.8.17

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

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

**Status: Comply**

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

### 4.1

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

#### 4.1.1

The 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 October 10<sup>th</sup>, 2022, and has been signed by the Sei Rasau 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 5 September 2022 which was attended by 100 participants in the PRYE unit. This policy has also been disseminated to external stakeholders, for example on January 4<sup>th</sup>, 2023, and at the signing of the work agreement.

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 number ASM-SUST-SOP-09 Revision 1 which was approved by the 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 ASM or PT GHL.

The results of interviews with daycare workers in each plantation unit, workshop staff at the factory unit, local contractors, representatives of the Seriam 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 February 22<sup>nd</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 number ASM-SUST-SOP-09 Revision 1 which was approved by the Regional Head. In point 7.1.3 letter "f", 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, 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 Logbook/Logbook and Responses, no complaints were found from external stakeholders. However, there have been complaints from workers concerned about the improvement of facilities in employee housing, for example:

- PRYM: Complaints from workers with the initials NY on November 25<sup>th</sup>, 2022, stating that the waste in employee housing has not been transported to landfills. This complaint was responded to by the company on November 26<sup>th</sup>, 2022, through an information and complaint response report which explained that a maximum of 5 days to come trash would be transported because the dump truck unit was on an official trip.
- BLRE: Complaint from an employee with the initials WO on May 11<sup>th</sup>, 2022, regarding a request to repair a damaged toilet. The complaint has been responded to and corrected by the company on May 13<sup>th</sup>, 2022.

Based on the results of interviews with workers in the plantation and factory units, local contractors, representatives of the Seriam 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 Communication SOP number ASM-SUST-SOP-09 Revision 1 which was approved by the Regional Head, 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 ASM and PT GHL. The results of interviews with all parties such as workers, contractors, representatives of the Seriam 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.

<b>Status: Comply</b>
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#### 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 2023 as the basis for CSR plans for 2023, for example the meeting contained in FGD for Social Aspect in Pulau Bawal Sub Village of Kendawangan Kiri Village on 8 February 2023 which was attended by community leaders and also women's representatives. Many program activities have been realized by the company in the 2022/2023 period, for example:

- Assistance with the Turun Sandals traditional event in Harapan Manis
- Freshwater Fish Cultivation Training at Tirta Weuing Ketapang
- Assistance for Lobster Farms on Pulau Bawal Sub Village of Kendawangan Kiri 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.

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

##### **PT Agro Sejahtera Manunggal**

The total area of PT ASM HGU is 6,124.69 Ha, which consists of:

- HGU Certificate No. 65 with the name of the right holder, namely PT Agro Sejahtera Manunggal with an area of 5,630.20 Ha on 17 July 2013 with the expiration date of 12 July 2048.
- HGU Certificate No. 234 with the name of the right holder, namely PT Agro Sejahtera Manunggal with an area of 414.17 Ha on July 27 2018 with the expiration date of July 26 2053.
- HGU Certificate No. 235 with the name of the right holder, namely PT Agro Sejahtera Manunggal with an area of 3.92 Ha on 27 July 2018 with the expiration date of 26 July 2053.
- HGU Certificate No. 236 with the name of the right holder, namely PT Agro Sejahtera Manunggal with an area of 16.0295 Ha on July 27 2018 with the expiration date of July 26 2053.

- HGU Certificate No. 237 with the name of the right holder, namely PT Agro Sejahtera Manunggal with an area of 46.32 Ha on July 27 2018 with the expiration date of July 26 2053.
- HGU Certificate No. 238 with the name of the right holder, namely PT Agro Sejahtera Manunggal with an area of 14.05 Ha on July 27 2018 with the expiration date of July 26 2053.

The land right is also accompanied by a business permit contained in the Decree of the Ketapang Regent No.050/DPMPTSP-DB/2018 dated 12 February 2018, the area permitted for plantation business is 7,250 Ha with a processing unit capacity of 60 Tons of FFB/Hour, located in Kendawangan District, Ketapang Regency, West Kalimantan Province.

#### **PT Gunajaya Harapan Lestari**

The total area of PT GHL HGU is 1,973.45 Ha, which consists of:

- HGU Certificate No. 144 with the name of the right holder, namely PT Gunajaya Harapan Lestari with an area of 1,973.45 Ha on 1 November 2016 with the expiration date of 27 September 2051.
- Decree of the Minister of Agrarian Affairs and Spatial Planning / Head of BPN (No. 62/HGU/KEM-ATR/BPN/2016) Regarding the Granting of Cultivation Rights in the Name of PT Gunajaya Harapan Lestari for Land in Ketapang Regency, West Kalimantan Province covering an area of 1,973.45 ha for 35 years on September 27, 2016.

The land right is also accompanied by a business permit contained in the Decree of the Ketapang Regent No.427/DISBUN-D/2013 dated 11 September 2013, the area permitted for plantation business is 2,250 Ha, located in Kendawangan District, Ketapang Regency, West Kalimantan Province.

Total area Agro Seriam Mandiri Cooperative is 960.80 Ha and total scope of certification is 8,290.45 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 2008 to 2015. As of 2022, land acquisition has been carried out covering an area of 6,725.66 Ha. The company shows the recapitulation of the names of land owners who have been released for PT ASM.

As for PT GHL, the company has also shown records of the last land compensation to the people of Pulau Bawal which was carried out in 2012 covering an area of 1,500 ha. The recording contains information, such as: Land Acquisition Letter, Declaration Letter, Land Acquisition Document & Minutes of Land Compensation Payment, Land Certificate, Documentation of Land Compensation Payment on 20 January 2012 along with a Participatory Map (Scale 1: 40.000) of the location of land compensation payments. All of these documents were signed by the company, the community and also the relevant agencies.

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.

#### **4.4.3**

The Unit of Certification has had SOP related land identification and compensation on SOP Procedure – Indemnity of Planting and Area (No. BGA-SOP-GL-903.1-R3, dated 30 September 2020) 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. Based on management interviews, it is known that Unit of Certification 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. As explained in indicator 4.4.2, there are participatory maps explaining the location of land compensation and signed jointly between the company and the previous owner community, for example, Documentation of Land Compensation Payment on 20 January 2012 for Pulau Bawal Village communities along with a Participatory Map (Scale 1 : 40.000) of the location of land compensation payments. All of these documents were signed by the company, the community and also the relevant agencies.



<p><b>4.4.4; 4.4.5; 4.4.6</b></p> <p>Based on latest assessment, there was no increase in the company's operational area. The last land compensation process was carried out before 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.</p>
<p><b>Status: Comply</b></p>
<p><b>4.5</b></p> <p><b>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.</b></p>
<p><b>4.5.1; 4.5.2; 4.5.3; 4.5.4; 4.5.6; 4.5.7; 4.5.8</b></p> <p>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 <i>GRTT</i> 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.</p> <p>Based on the results of interviews with representatives of surrounding Villages (Pulau Bawal Sub Village of Kendawangan Kiri Village &amp; Seriam Village), there are no issues of dispute or other land issues with the company.</p>
<p><b>Status: Comply</b></p>
<p><b>4.6</b></p> <p><b>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.</b></p>
<p><b>4.6.1 &amp; 4.6.2</b></p> <p>The certification unit shows procedure of Land Acquisition and Compensation, document No. BGA-SOP-GL-903.1-R3, dated 30 September 2020. Procedures include explaining the land identification process, outreach to the community, physical inventory, to the compensation process.</p> <p>Completeness of compensation payment documents: receipts, documentation, identification cards (<i>KTP</i>), minutes of land over and compensation, certificates of land ownership, statement letters, detailed maps of land and attendance lists of land measurements.</p> <p><b>4.6.3</b></p> <p>Until the latest assessments were carried out there were no new <i>GRTTs</i>. 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-R3, dated 30 September 2020. 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.</p> <p>Based on the results of interviews with the Pulau Bawal Sub Village of Kendawangan Kiri Village communities, the community benefits in the form of plasma plantations that are shaded by the Bawal Mandiri Sejahtera Cooperative, in which the community gets equal opportunities for the entire island community to become members of the cooperative and obtain results that are beneficial to their welfare.</p>
<p><b>4.6.4</b></p> <p>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 <i>GRTT</i> 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,</p>



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 evidenced of land compensation is Recapitulation of Compensation Fund Applications - Region VII for the 2008 - 2015 period with a total area of 6,725.66 hectares freed up, for 480 heads of households.

In detail, there are records of acquisition of land at PT Agro Sejahtera Manunggal, for example on behalf of OMA Hendrika (INYUH) of the Seriam Village community located in Block A-07 covering an area of 5 hectares with a compensation value of Rp. 1,250,000, dated 24 December 2008. Supporting documents are available in the form of Map of location of compensation signed by both parties, proof of payment received on 12 December 2008, Land Handover Letter, Statement Letter, Land Acquisition Document and Minutes of Land Compensation.

As for PT GHL, the company has also shown records of the last land compensation to the people of Pulau Bawal Sub Village of Kendawangan Kiri Village which was carried out in 2012 covering an area of 1,500 ha. The recording contains information, such as: Land Acquisition Letter, Declaration Letter, Land Acquisition Document & Minutes of Land Compensation Payment, Land Certificate, Documentation of Land Compensation Payment on 20 January 2012 along with a Participatory Map (Scale 1 : 40.000) of the location of land compensation payments. All of these documents were signed by the company, the community and also the relevant agencies.

Based on the results of interviews with representatives of surrounding Villages (Pulau Bawal Sub Village of Kendawangan Kiri Village & Seriam Village), there are no issues of dispute or other land issues with the company.

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

**4.7.3**

Based on the results of interviews with representatives of surrounding villages (Pulau Bawal Sub Village of Kendawangan Kiri Village & Seriam 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.

<b>Status: Comply</b>
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**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-ASM-25-R0 dated 2 January 2020. 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, Seriam 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 C37 (Bengkuang raya Estate) and Block C25 (Pembangunan Raya 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 Seriam Village, it was also explained that there were indeed areas that had not been compensated by the company.

<b>Status: Comply</b>
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**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 Agro Seriam Mandiri* for the period of December 2022. In the proof of payment of FFB to these farmers, the FFB price set is in accordance with the price determined by the Plantation Agency of 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 II December 2022.

**5.1.3**

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

**5.1.4 & 5.1.8**

Pembangunan Raya POM is part of the PT Agro Sejahtera Manunggal entity which has a business license in 2018. In the context of the obligation to build plasma, the company already has Cooperation documents, with the following details:

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

- Cooperation Agreement between PT Agro Sejahtera Manunggal and the Seriam Mandiri Agro Plantation Cooperative (Endorsement of the Office of Small and Medium Enterprises Cooperatives, Industry and Trade of Ketapang Regency No.255/BH/KOP.UKM & PERINDAG/II/2009 domiciled in Seriam Village, Kendawangan District, Ketapang Regency, West Kalimantan Province No. 01/SPK-ASM/VIII/2010) concerning Development and Management of Oil Palm Plantations with a Partnership Pattern of 1,000 Ha. The cooperation period is approximately 25 years from the signing of the agreement (27 August 2010).
- Addendum I to the Partnership Agreement for the Development and Management of Oil Palm Plantations with an area of  $\pm 1,321$  Ha No. 01 ADD1/SPK-ASM/VIII/2010 between the Agro Seriam Mandiri Plantation Cooperative and PT Agro Sejahtera Manunggal dated 16 December 2015. The essence of Unit of Certification is to increase membership by handing over land from  $\pm 1,000$  Ha to  $\pm 1,321$  Ha with a period of 30 years. With a total of 660 farmers.

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

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

- 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
- 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.
- The first party hands over the management of the oil palm plantation belonging to members of the farmer group covering an area of  $\pm 1,335.23$  Ha to be managed by the second party, the total area can increase 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 the handover of management 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

- 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
- The validity period of this cooperation is 25 years

Based on the results of public consultation with the Koperasi Agro Seriam Mandiri, the construction of the plasma has been completed and has received profit sharing.

#### **Collaboration with Koperasi Perkebunan Bawal Sejahtera Mandiri**

For the entity on behalf of PT Gunjaya Harapan Lestari, the company has also realized the construction of a plasma for the people of Pulau Bawal Sub Village of Kendawangan Kiri Village which is contained in the Cooperation Agreement Document for the Development and Management of a Partnership Pattern of Oil Palm Plantations covering an area of 608 ha (No. 01 ADD/SPK-KOPBSM/XII/2012 & No. 01 ADD/SPK-GHL/XII/2012) between the Bawal Sejahtera Mandiri Plantation Cooperative and PT Gunjaya Harapan Lestari on March 21, 2016. The agreement document explains several things, including:

- Cooperation in the development and management of oil palm plantations under a partnership pattern, in which the core company will carry out development activities in stages in accordance with the plan made by the core company together with the cooperative.
- The term of the agreement is for 1 planting cycle (approximately 30 years old) calculated from the last crop.
- For replanting, the parties agree to enter into a new agreement.
- The parties agree that the calculation of SHK (Remaining Plantation Products) will be carried out periodically, namely every 3 months and distributed in the following month.

#### **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 II December 2022. Where the calculation of payment is in accordance with agreement. Furthermore, based on the statement of the smallholder members (*Koperasi Agro Seriam Mandiri* and *Koperasi Bawal Sejahtera 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 Pembangunan Raya Mill, along with calibration records:

- The certification unit has also shown documents on the weighbridge calibration (Serial Number 123650392) carried out in 7 February 2023 and valid until 7 February 2024 by Legal Industrial and Commerce Department Ketapang Regency (No.017/SKHP/MET-TE/II/2023).
- The certification unit has also shown documents on the weighbridge calibration (Serial Number 123650394) carried out in 7 February 2023 and valid until 7 February 2024 by Legal Industrial and Commerce Department Ketapang Regency (No.018/SKHP/MET-TE/II/2023).

The company performs calibrations aimed at improving the integrity of FFB weighing from third parties and also minimizing scale fraud.

#### **5.1.9**

The company has a complaint handling mechanism for farmers in the form of a Communication SOP with Number ASM-SUST-SOP-09 which was passed on 3 December 2019. Based on interviews with FFB suppliers (Cooperatives) as well as Seriam Village representatives, the parties have understood the mechanism for submitting complaints to the company.

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

<b>Status: Comply</b>
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**5.2**

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

**5.2.1 & 5.2.5**

The company already has cooperation with the surrounding community in terms of developing community plasma, including:

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

- Cooperation Agreement between PT Agro Sejahtera Manunggal and the Seriam Mandiri Agro Plantation Cooperative (Endorsement of the Office of Small and Medium Enterprises Cooperatives, Industry and Trade of Ketapang Regency No.255/BH/KOP.UKM & PERINDAG/II/2009 domiciled in Seriam Village, Kendawangan District, Ketapang Regency, West Kalimantan Province No. 01/SPK-ASM/VIII/2010) concerning Development and Management of Oil Palm Plantations with a Partnership Pattern of 1,000 Ha. The cooperation period is approximately 25 years from the signing of the agreement (27 August 2010).
- Addendum I to the Partnership Agreement for the Development and Management of Oil Palm Plantations with an area of  $\pm$  1,321 Ha No. 01 ADD1/SPK-ASM/VIII/2010 between the Agro Seriam Mandiri Plantation Cooperative and PT Agro Sejahtera Manunggal dated 16 December 2015. The essence of Unit of Certification is to increase membership by handing over land from  $\pm$  1,000 Ha to  $\pm$  1,321 Ha with a period of 30 years. With a total of 660 farmers.

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

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

- 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
- 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.
- The first party hands over the management of the oil palm plantation belonging to members of the farmer group covering an area of  $\pm$  1,335.23 Ha to be managed by the second party, the total area can increase 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 the handover of management 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
- 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
- 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 results of the document review, it is known that the development of partnership plasma 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 Seriam Mandiri Agro Plantation Cooperative covering an area of 1,366.27 Ha and the Sawit Maju Sejahtera 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 District Agriculture, Livestock and Plantation Office on March 15, 2022.

Based on the results of 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. The implementation of the development of the surrounding community estate was in accordance with the agreement of both parties. Koperasi Agro Seriam Mandiri is also included in the scope of RSPO certification.

**Collaboration with Koperasi Perkebunan Bawal Sejahtera Mandiri**

For the entity on behalf of PT Gunajaya Harapan Lestari, the company has also realized the construction of a plasma for the people

of Pulau Bawal Sub Village of Kendawangan Kiri Village which is contained in the Cooperation Agreement Document for the Development and Management of a Partnership Pattern of Oil Palm Plantations covering an area of 608 ha (No. 01 ADD/SPK-KOPBSM/XII/2012 & No. 01 ADD/SPK-GHL/XII/2012) between the Bawal Sejahtera Mandiri Plantation Cooperative and PT Gunajaya Harapan Lestari on March 21, 2016. The agreement document explains several things, including:

- Cooperation in the development and management of oil palm plantations under a partnership pattern, in which the core company will carry out development activities in stages in accordance with the plan made by the core company together with the cooperative.
- The term of the agreement is for 1 planting cycle (approximately 30 years old) calculated from the last crop.
- For replanting, the parties agree to enter into a new agreement.
- The parties agree that the calculation of SHK (Remaining Plantation Products) will be carried out periodically, namely every 3 months and distributed in the following month.

#### 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 (Agro Seriam Mandiri Plantation Cooperative and Bawal Mandiri Sejahtera 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 improve the welfare of the surrounding community with the help of programs in other fields, for example:

- Assistance with the Turun Sandals traditional event in Harapan Manis
- Freshwater Fish Cultivation Training at Tirta Weuing Ketapang
- Assistance for Lobster Farms on Pulau Bawal Sub Village of Kendawangan Kiri Village

**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 force since October 10<sup>th</sup>, 2022, and has been signed by the Sei Rasau Regional Head. 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 color, 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 November 2<sup>nd</sup>, 2022 at PRYM unit. This policy has also been disseminated to all stakeholders, for example socialization on February 22<sup>nd</sup>, 2022.

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 force since October 10<sup>th</sup>, 2022, and has been signed by the Sei Rasau Regional Head. The unit of certification also shows a workforce register document for the December 2022 period which contains demographic information for all workers at PT ASM and PT GHL, namely workers who come from various regions, religions, ages, etc. Then from the results of interviews with manuring workers at the TRNE 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 Central Java to West Kalimantan. They also stated that there is no collection of fees and no retention of 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 ASM and PT GHL 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. In terms of worker promotion, the certification unit conducts a performance appraisal/evaluation before promoting workers to the newest status/position/class. For example, promotion for workers with the initials AB (Speed Operator) listed in decree number 004/SK-PTB/Wil-7/HRD/VI/2022 dated June 1<sup>st</sup>, 2022. The document explains that workers are promoted from *PTH* to *PTB – P1*. The company also shows the results of the employee performance appraisal with the initials AB with the evaluation criteria of morality, capability, integrity and presence which form the basis for consideration of employee promotions.

Based on the results of interviews with HR management, 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. For example, pregnant workers will be transferred to lighter jobs such as cleaning workers in offices. This was clarified by the results of interviews with female spray workers and representatives of the gender committee at PT ASM and PT GHL, 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/Counselor, Chairperson, Deputy Chairperson, Secretary and Members.



Gender committee work program in 2022 for all units at PT ASM and PT GHL, including regular meetings of the gender committee management, integrated healthcare center, periodic pregnancy checks, socialization of breastfeeding, 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:

- Socialization regarding the flow of complaint and socialization and recording of sexual harassment/violence which was held on July 13<sup>th</sup>, 2022, at the PRYE unit.
- Socialization of breastfeeding and early examination of breast cancer which was held on October 14<sup>th</sup>, 2022, at the BRYE unit.

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:

- 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. That document also explained about the wage scale structure that applies to workers with *PTB* status starting from the lowest class P1 (IDR 2,928,000) to the highest class U8 (IDR 3,163,000).
- Memo document number 114/MEMO-BGA/HC-POP/XII/2022 concerning Determination of Wage for *PTB* and *PTH* Employees for 2023 which was issued on December 23<sup>rd</sup>, 2022. That document also explained about 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 spray and 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 sterilizer operator in PRYM 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:

- Company Regulation document for the period 2021 – 2023 which was ratified on April 19<sup>th</sup>, 2021, by the Director General of Development Industrial Relations and Labor Social Security. The document informs about all work requirements in accordance with the applicable labor regulations in Indonesia.
- 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 pay slips which include components such as basic wages, premiums, overtime, benefits (BPJS, electricity subsidies, etc.), and deductions (BPJS, loans, SPSI, cooperatives, etc.). Based on the results of the interviews, workers can explain their basic wages and allowances as well as the deductions they receive each month. Following are some examples of wage documents for workers during December 2022 and January 2023, including:

- TRNE unit: Harvesters with the initials MHD who receive a basic wage in January 2023 of IDR 2,876,252
- BRYE unit: Daycare officers with the initials ANT who receive a basic salary in December 2022 of IDR 2,888,000
- CBNT unit: Drivers with the initials DS (*PTB – P1*) who receive a basic wage in January 2023 of IDR 2,928,000

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:

- Work agreement letter of *PKWTT/PTH* worker number 001/SPK-PKWTT/7A-ASML/PRYM/VIII/2022 dated August 3<sup>rd</sup>, 2022. The document explains that a worker with the initials IR is accepted to work as a logistics admin.
- Work agreement letter of *PKWTT/PTH* for harvest workers with the initials STP who were accepted to work as harvesters at the PRYE unit on February 1<sup>st</sup>, 2023.

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, weighbridge operator with the initials NTSY receives a basic wage for December 2022 that is in accordance with the applicable minimum wage, 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 April 19<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 field visits to fertilizer workers at the TRNE unit, information was obtained that a worker with the initials AM who previously worked as a harvester, has now been transferred to become a fertilizer shunting officer. 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 fertilizer shunting worker. This is in line with the results of interviews with workers that they have understood job descriptions, the wages they receive, and other matters relating 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:
  - Engine room operator pay slip document with the initials SDT (*PTB-Q2*) who receive a basic salary overtime pay of IDR 2,973,000 and overtime pay of IDR 2,380,118 in December 2022 for a total of 63.5 hours of overtime and the value of one hour overtime pay is IDR 17,184. 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 AH (*PTH*) who receive a basic salary overtime pay of IDR 2,888,000 and premium pay of IDR 2,394,000 in December 2022. The worker has a total of 69 hours of overtime and the value of one hour overtime pay is IDR 16,693.
- Employees in the office will get a replacement premium for overtime if they work more than 7 hours. The premium earned has the same value or more when compared to overtime pay. For example, the pay slip document for a weighbridge operator with the initials NTSY (*PTH*) who received a basic wage in December 2022 of IDR 2,888,000 and a premium of IDR 1,600,000. The worker has a total of 44 hours of overtime and the value of one hour's overtime pay is IDR 16,693.
- Every worker also has the right to annual leave of 12 days in one year. The following is an example:
  - An employee with the initial SP who applies for 2 days annual leave from the total remaining 16 days of leave entitlements from December 15<sup>th</sup> – 16<sup>th</sup>, 2022. This request has been approved by the Mill Manager of PRYM.
  - An employee with the initials AKG who applied for annual leave for 1 day out of the total remaining 14 days of leave entitlements on February 6<sup>th</sup>, 2023. This application has been approved by the PRYE Estate Manager.
- 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, a worker with the initials EWT 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 September 5<sup>th</sup>, 2022, to December 6<sup>th</sup>, 2022. The request has been approved by the Estate Manager TRNE.
- The unit of certification has applicable deductions/fines if workers commit deviations/negligence in their work. For example, deductions from workday payments if workers are absent from work without reason. Apart from that, there are also fines for negligence at work, for example, in harvesting work such as harvesting fruit in the unripe category, a discount of IDR 25,000 will be imposed per length.

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 in each unit for 2022 for Region Sei Rasau, 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 2022 period which explains that the current condition of worker welfare facilities is in good condition.

Based on the results of field observations in PRYM, PRYE, BRYE, BLRE and TRNE 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.

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 ASM and PT GHL Sei Rasau region in 2023 which has been approved by the Regional Head. Wages apply as basic wages, allowances such as holiday allowance (*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.

<b>Status: Comply</b>
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## 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 document which has been in force since October 10<sup>th</sup>, 2022, and has been signed by the Sei Rasau Regional Head. 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 a *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 ASM at the Office of Manpower and Transmigration at Ketapang Regency with registration number 059/LKS-BI/STKT-C/III/2014 on April 9<sup>th</sup>, 2021.
- Proof of registration of *LKS Bipartite* PT GHL at the Office of Manpower and Transmigration at Ketapang Regency with registration number 085/LKS-BI/TKT-B/III/2017 on April 9<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 ASM management and members which was held on January 10<sup>th</sup>, 2022, and was attended by 18 participants. The meeting discussed several topics related to industrial relations between workers and companies, one of which was about work accidents and BPJS *ketenagakerjaan/jamsostek*.
- Minutes of meeting *LKS Bipartite* PT GHL management and members which was held on December 5<sup>th</sup>, 2022, and was attended by 8 participants. The meeting discussed several topics related to industrial relations between workers and companies, one of which was about work accidents and BPJS *ketenagakerjaan/jamsostek*.

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 Unit of Certification of the bipartite is still from the employer and this is based on the results of the previous deliberation.

<b>Status: Comply</b>
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## 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 document which has been in force since October 10<sup>th</sup>, 2022, and has been signed by the Sei Rasau Regional Head. 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. Based on the results of field visits and interviews with harvest, fertilizer and spray workers in the PRYE, BLRE and TRNE units it is also known that there are no workers under 18 years of age. The youngest worker is 19 years old.

Based on the results of interviews with workers in each estate and mill unit, representatives of the *LKS Bipartite* and PT Suri Adidaya Kapuas 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 ASM and PT GHL 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 and SOP Recruitment of Non-Staff Employees number BGA-SOP-HC-304.08-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 6 college 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 BLRE unit on February 20<sup>th</sup>, 2023
- Socialization at the PRYM unit on November 2<sup>nd</sup>, 2022
- Socialization at the PRYE unit on September 5<sup>th</sup>, 2022
- Socialization at the TRNE unit on September 15<sup>th</sup>, 2022
- Socialization to stakeholders (contractor workers and surrounding communities) on February 22<sup>nd</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.

	<b>Status: Comply</b>
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### **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 Labor and Human Rights Policy document which has been in force since October 10<sup>th</sup>, 2022, and has been signed by the Sei Rasau Regional Head. 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 socialization to workers and other stakeholders, for example on February 20<sup>th</sup>, 2023, at BLRE 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. Then, the source added information that in the TRNE unit there was an act of domestic violence committed by a worker with the initials BS against his wife with the initials LN. This is explained in detail in section 3.5 Summary of Arising Issues from Public and Auditor Verification.

#### **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 force since October 10<sup>th</sup>, 2022, and has been signed by the Sei Rasau Regional Head. 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, there are 6 workers in the BLRE unit who apply for maternity leave during the 2022 period.

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 newborn 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 center, 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 center 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 Grievance Resolution SOP number BGA-SOP-HC-311.1-R0 which was ratified on April 24<sup>th</sup>, 2012, by the Director. The unit of certification also has Labor and Human Rights Policy document which has been in force since October 10<sup>th</sup>, 2022, and has been signed by the Sei Rasau Regional Head. 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 (superiors such as foremen, assistants or managers). 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 PRYM unit on November 2<sup>nd</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.

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

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

#### 6.6.1

The company shows the Labor and Human Rights Policy document which has been in force since October 10<sup>th</sup>, 2022, and has been signed by the Sei Rasau 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 PRYM unit on November 2<sup>nd</sup>, 2022, and at the TRNE unit on September 15<sup>th</sup>, 2022, and to stakeholders (contractor workers and surrounding communities) on February 22<sup>nd</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:

Then, based on the results of the study of employment documents and the results of interviews with workers in plantation units and factories as well as representatives of *LKS Bipartite*, the following information was obtained:

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

<b>Status: Comply</b>	
<b>6.7</b>	
<b>The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</b>	
<b>6.7.1</b>	
<p>Unit of certification has an adequate OHS organization in accordance with the laws and regulations. The company has a OHS Committee structure based on the Decree of the Regent of Ketapang No. 560/03/NAKER/2022 dated 03 January 2022. The OHS Committee structure consists of a Chairman, 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 paramedics. The organizational structure has changed because there was a replacement for the OHS Committee Secretary with a new General OHS expert. Application for OHS Committee structure of PT. ASM was submitted on February 21, 2023 and received by the Ketapang Regency Manpower and Transmigration Agency and until now the letter of approval for the organizational structure of OHS Committee is still being processed at the relevant Office.</p> <p>The new OHS Committee secretary, namely RSM, is a General OHS expert with training certificate no. 05/1610120922/AS.01.03/IX/2022 dated 12 September 2022. General OHS expert designation from the Indonesian Ministry of Manpower No. 5/12340/AS.01.03/IX/2022 dated 12 September 2022 and OHS expert authority card license No. 1610120922/Q-AK3U/01/IX/2022 on 12 September 2022 valid until 12 September 2025.</p> <p>In addition, the Company has conducted regular meetings between OHS Committee management and employees which are held every month. For example, there are regular monthly meetings including a meeting on December 27<sup>th</sup>, 2022 which was attended by all staff, Unit of Certification airperson of OHS Committee, the secretary of OHS Committee, PIC Sustainability and 12 estate managers. During the meeting several things were discussed including discussing issues related to OHS, discipline the use of PPE for all employees and implement OHS compliance in work units. In addition, there is discussion related to sustainability work programs both in OHS, environment and certification targets.</p> <p>Based on the explanation above, it is known that an OSH organization has been formed with an adequate number of personnel in accordance with the laws and regulations.</p>	
<b>6.7.2</b>	
<p>The certification unit has emergency and work accident response procedures in several policies including:</p> <ul style="list-style-type: none"> <li>• SOP for First Aid in Accidents (BGA-SOP-GKG-0513-10-R0) which was approved by Area Controller VI on 15 May 2013. The procedure regulates several matters including: <ul style="list-style-type: none"> <li>- The underlying thing is that the practice of first aid in the workplace is very important</li> <li>- Basic principles of first aid activities</li> <li>- Factors that must be considered in setting up first aid facilities in the workplace</li> <li>- Matters that must be considered by First Aid Officers</li> <li>- Training of first aid officers</li> <li>- Responsibilities of first aid workers</li> </ul> </li> <li>• Accident Investigation Procedure and Report (BGA-SOP-EM-1115.1-R0) approved by the Director of Operations of PT. BGA on 10 September 2012. The procedure regulates several matters including: <ul style="list-style-type: none"> <li>- Scope includes all document and data control activities in the framework of implementing SOP for accident reporting and investigation along with supporting administration in all work units within the BGA group of companies</li> <li>- Procedures and responsibilities of designated personnel in accident investigations</li> <li>- Internal reporting system</li> <li>- External Reporting System</li> <li>- Investigation</li> <li>- Follow-up.</li> </ul> </li> <li>• 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: <ul style="list-style-type: none"> <li>- Scope: emergency preparedness and response activities in GKG and GKS Units.</li> <li>- Emergency: Types of emergencies include fire, explosion, B3 spill and earthquake.</li> </ul> </li> </ul>	

**6.7.3**

Unit of Certification has PPE Control SOP No. BGA-SUST-SOP-18 Ratified by Regional Head 4A on 12 May 2018, which includes, among others:

- Identification of PPE
- Coaching
- Use of PPE
- Maintenance and Storage of PPE
- Disposal of PPE
- Procurement of PPE
- Provision of PPE to employees
- Replacement of damaged or lost PPE
- Inspection
- Reporting

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

- Provisions for eye and face protective equipment, in the form of safety glasses (spectacles), goggles, face shields, diving masks, and full face masks. 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 (micro-organisms) and extreme temperatures.
- Hand protection, in the form of gloves made of metal, leather, canvas, 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 (vests), aprons (aprons/coveralls), 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 of humans, animals, and plants

Based on the document review, it is known that there are PPE stocks in each unit, including PPE stocks at BLRE, consisting of 90 pcs of safety goggles, 54 sheets of Fertilizer Apron Pants, 114 Sheets of Spray Apron Pants, 93 Sheets of Spray Apron, 234 V-Gard Fastrac Safety Helmet pcs, Safety Shoes 3 pairs, etc. PRYM has stock of PPE including 100 pcs Yellow Helmets, 12 pcs Blue Helmets, 12 pcs Welding Gloves, 53 pcs Earplugs, and 9 pairs of safety shoes

The company also showed examples of handing over PPE, including on January 3<sup>rd</sup>, 2023, 25 boots for 25 harvesters at BLRE. In addition, there was a handover of PPE at BRYE in the form of safety shoes, helmets, safety belts for BRYE Division 1 clerks.

All PPE provided by the company to employees is provided free of charge according to the deadline for providing PPE. As for PPE that is damaged before the specified time limit, employees can apply for PPE replacement by showing evidence of the PPE that has been damaged.

PT. ASM and PT. GHL has sanitation facilities in the form of BGS and BMS which function to store all work equipment and PPE for fertilizing and spraying workers. After completing fertilizing and spraying, all workers must carry out self-cleaning at BGS and BMS before returning to their respective homes. Each estate has a rinse house facility called BGS which is sufficient enough to cover all spray employees, as an example from field observations in TRNE there is a rinse house consisting of 3 sections for spray employees as many as 7 people. Inside the rinse house there is a place to store and clean work tools and PPE used by spray employees. In addition, there is a reservoir for water used for washing pesticides so that the water used for washing pesticides does not come out above the ground.

Based on the description above, it shows that the company has provided adequate Personal Protective Equipment (PPE) according to its designation for each worker

**6.7.4**

The certification unit already has a list of workers which also includes *BPJS Ketenagakerjaan* participant numbers for all workers in each estate and mill unit. As one example, based on a review of the December 2022 worker list document and proof of payment for

*BPJS Ketenagakerjaan* for the same period, it is known that companies have registered and paid all their workers in the *BPJS Ketenagakerjaan* program, which consists of work accident insurance, death benefit, old age benefit and pension benefit via bank transfer with details as follows:

- **PRYM**
  - The list of workers in the PRYM unit for the period of December 2022 is 97 workers.
  - Proof of payment for *BPJS Ketenagakerjaan* for the December 2022 period for a total of 97 workers on January 13<sup>rd</sup>, 2023.
- **PRYE**
  - The list of workers in the PRYE unit for the period of December 2022 is 429 workers.
  - Proof of payment for *BPJS Ketenagakerjaan* for the December 2022 period for a total of 429 workers on January 13<sup>rd</sup>, 2023.
- **BLRE**
  - The list of workers in the BLRE unit for the period of December 2022 is 375 workers.
  - Proof of payment for *BPJS Ketenagakerjaan* for the December 2022 period for a total of 375 workers on January 13<sup>th</sup>, 2023.
- **BRYE**
  - The list of workers in the BRYE unit for the period of December 2022 is 322 workers.
  - Proof of payment for *BPJS Ketenagakerjaan* for the December 2022 period for a total of 322 workers on January 13<sup>th</sup>, 2023.
- **CBNT**
  - The list of workers in the CBNT unit for the period of December 2022 is 101 workers.
  - Proof of payment for *BPJS Ketenagakerjaan* for the December 2022 period for a total of 101 workers on January 13<sup>th</sup>, 2023.
- **MBNR**
  - The list of workers in the MBNR unit for the period of December 2022 is 68 workers.
  - Proof of payment for *BPJS Ketenagakerjaan* for the December 2022 period for a total of 68 workers on January 13<sup>th</sup>, 2023.
- **TRNE**
  - The list of workers in the TRNE unit for the period of December 2022 is 379 workers.
  - Proof of payment for *BPJS Ketenagakerjaan* for the December 2022 period for a total of 379 workers on January 13<sup>th</sup>, 2023.

The certification unit has also included some of its employees in the *BPJS Kesehatan* program. From the results of a review of the workforce list documents for the December 2022 period, it is known that the total number of workers from PT ASM and PT GHL is 1,771 people. Then, the unit of certification showed proof of *BPJS Kesehatan* payment for 532 workers on December 7<sup>th</sup>, 2022. Based on the results of interviews with workers in the sampling unit, for example the sterilizer operator in the PRYM unit, information was obtained that the company had included workers and their families (wives and children) in the *BPJS Kesehatan* program. This can be proven in the worker's pay slip document for December 2022 that there is a deduction for *BPJS Kesehatan*. In addition, based on the results of interviews with spray workers at the TRNE unit, information was obtained that these workers had not been registered and had not received a *BPJS Kesehatan* card.

Based on the results of a review of workforce documents for the period December 2022 and details on the list of workers registered for the health insurance program, the following information is obtained:

- *BPJS Kesehatan* Program = 532 workers
- *PBI*/health insurance program = 817 workers
- Workers who have not been registered because their ID Number (*NIK*) *KTP* is not online = 422 workers

Based on the results of interviews with management representatives and HR staff, information was obtained that all workers had personal identity/*KTP* at the time of recruitment. Then, in the *BPJS Kesehatan* registration process, there are several *KTP* workers whose ID numbers (*NIK*) are not online (not yet in the form of electronic *KTP*/e-*KTP*) in the *BPJS Kesehatan* system. Workers who have an ID number (*NIK*) that is not online cannot be registered with the *BPJS Kesehatan* program because this data cannot be inputted into the EDABU application of *BPJS Kesehatan*. Then, until now the company is still in the document repair stage by encouraging workers to renew their ID number (*NIK*) *KTP* to the Population and Civil Registry Service (*DISDUKCAPIL*) so they can make online payments into the *BPJS Kesehatan* program. The company also routinely coordinates directly with staff at *BPJS Kesehatan* to find out progress. The company also shows:

- PT ASM's *BPJS Kesehatan* registration progress until February 2023 is 43%.

- *BPJS Kesehatan* Participation Registration Program for all Employees number 005/HR-Sei-Rasau/2023 on January 27 2023 which was signed by RH Sei Rasau. The document explains that *BPJS Kesehatan* Registration for all workers at PT ASM and PT GHL will continue until November 2023 with a target of 100%. In addition, the company will also require that all workers registered with the *PBI* health insurance program will be transferred to the company's *BPJS Kesehatan* program.

As a form of temporary health protection for workers who have not been programmed in *BPJS Kesehatan*, the company has a clinic that can be accessed by all workers and their families. All medical expenses will be borne by the company including the cost of hospitalization at the referral hospital. For example, evidence of medical treatment for a worker with the initials ATN from the PRYM unit who complains of pain in the solar plexus.

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

#### 6.7.5

The Unit of certification shows the calculation table for Frequency Rate (FR) and Severity Rate (SR), including for PT. ASM and PT. GHL for the period 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 period January-December 2022 PT. ASM and PT. GHL has a total of 1,819 employees, a total working of 3,228,128 hours and there were 52 work accidents which caused 147 lost working days, so the FR value is 50.2 meaning that in January-December 2022 there was a loss of working time of 50.2 hours per million people work, this figure shows workers who are not at work after work accidents. In addition, in January-December 2022 there was an SR value of 45.5 meaning that during the period January-December 2022 there was a loss of working time of 45.5 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 Unit of certification has SOP for Observation and Control of Plant Pest Organisms with Document No. BGAAGRKS-PTKS-PHT and BGAAGRKS-PTKS-PG for weed control. The document describes, among other things:

- Control is carried out based on detection and census results that exceed the economic threshold.
- Explanation 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 for fire caterpillar predators to live. 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 includes 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

The company has developed beneficial plants including *Turnera Subulata* and *Antigonon Leptopus* which are spread across the Division.

The company conducts EWS every day against HPT attacks and conducts a census if heavy attacks are found in the block.

Potential pests that exist include rats, horn beetles, and UPDKS, 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 the results of the EWS in March 2022 - February 2023 there were pest attacks between 0% and 4.5%. The company did



not conduct a census of the affected blocks because it has a mild attack category, namely rat attack <5%, so it does not require rat pest control using insecticides. The company has also developed a method of preventing and controlling rat pests in a biological way, namely through the development of the natural predator *Tyto Alba*, including in Block E39 Division 4 BRYE and G58 Division I BLRE

- **UPDKS**

Based on the results of the EWS for the period March 2022 to February 2023 there were no heavy category *UPDKS* pest attacks, namely attacks of  $\geq 5$  individuals/one frond so that it did not require 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 D51 D52 E52 E53 Division III BRYE and block H59 Division 1 BLRE

- **Oryctes**

Handling of *Oryctes* for 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 February 2023, *Oryctes* 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 an attack with a severe category is found in these blocks.

Based on the results of verification and review of documents, the company already has monitoring of the pesticides used with the distribution permit still in its validity period, including:

NO	INGREDIENTS	ACTIVE INGREDIENTS	REGISTRATION NUMBER	PERMIT DATE
1	BASTA	Amonium Glufosinate	RI.02030120155299	03 December 2025
2	PENTA UP	Glyphosate	RI.01030120062456	18 November 2026
3	METAFURON 20 WG	Metyl Metsulfuron	RI.01030120062456	18 November 2026
4	STARLON	Triklopir	RI. 01030120072899	27 June 2027
5	CYPERIN 250 EC	Cypemetrin	RI.01010120055255	11 June 2025
6	BORAL 480 EC	Sulfantrazon	RI. 01030119971351	27 June 2027

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

### 7.1.2

Based on document review, interviews with the Estate Manager, and field observations at ASM and GHL 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 ASM and GHL does not use fire in controlling 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 Unit of Certification 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, including policies related to limited use of 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:

- Herbicide class 1A and 1B (Paraquat) will no longer be 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
- For the control of weeds around which there are *nephrolepis* not using *methylmetsulfuron* but using triclopyr

The Unit of certification 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 addition, the company already has a policy regarding adjusting the dosage of herbicides (*Glyphosate* and *Ammonium Glufosinate*) in weed control which is listed in the internal memo approved by the Head of Research and Development Number 002/MEMO-BGA/RSC/1/2022 dated 03 January 2022. Internal This memo is a manifestation of the company's commitment to managing plantations that are environmentally friendly and supports the Soil Healthy program so that the dosage of weed control using active ingredient *Glyphosate* and *Ammonium Glufosinate* herbicides in weed control in dishes, path, collection point, and the fern *Stenochlaena palustris* will undergo adjustments according to the latest experimental from the Research Department

In the use of pesticides, not all areas are sprayed with pesticides, but the areas that are sprayed are discs, path and collection point. To find out the need for spray volume per hectare, the company calibrates the sprayer, nozzle, and road speed so that the dosage and volume of the spray solution is correct and not excessive. The company has determined which pesticides to use 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, Pteridophyt, etc.

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

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

#### 7.2.2

The company shows the overall use of pesticides in area 7a, including the BLRE, BRYE, TRNE and PRYE Units. The types of pesticides and the amount of materials used in 2022 are:

Descriptions	Ingredients Active	Sat	LD 50	2022	
				Qty	Ha
Basta	<i>Amonium Glufosinate</i>	Lt	>5000	2.691	8.997
Cyperin	<i>Cypermethrin</i>	Lt	231,90	-	-
Feromonas	<i>Ethyl Methyl Octanoate</i>	Lt	>5000	-	-
Penta Up	<i>Glyphosate</i>	Lt	>5000	14.050	31.113
Metafuron	<i>Metil Metsulfuron</i>	Kg	>5000	740	31.965
Racumin	<i>Coumatetralyl</i>	Kg	1.000	-	-

Based on the data above, it is known that the active ingredient of Penta Up 486 SL is Isopropyl amine glyphosate, with an oral and dermal LD50 >5,000 md/Kg3 and the active ingredient Metafuron 20 WG, namely Methyl metsulfuron with an oral and dermal LD50 >5,000 md/Kg3.

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

### 7.2.3

The company has prioritized pesticide application products and methods selectively so that it shows a graph of decreasing pesticide use. The company shows the overall use of pesticides in area 7a, including the BLRE, BRYE and PRYE Units. The types of pesticides and the amount of materials used in 2021 - 2022, namely:

Descriptions	Ingredients Active	Sat	2021		2022	
			Qty	Ha	Qty	Ha
Weed Solution	<i>Adjuvant</i>	Lt	110	572	1.245	6.641
Agistik	<i>Akilaril Poligokil Eter</i>	Lt	177	12.737	110	5.939
Basta	<i>Amonium Glufosinate</i>	Lt	8.176	24.173	2.691	8.997
Boral 480EC	<i>Sulfantrazan</i>	Lt	-	-	117	1.928
Cyperin	<i>Cypermethrin</i>	Lt	91	1.110	-	-
Kairomax	<i>4-allyl isol</i>	Lt	120	60	-	-
Feromonas	<i>Ethyl Methyl Octanoate</i>	Lt	10	84	-	-
Penta Up	<i>Glyphosate</i>	Lt	21.232	44.635	14.050	31.113
Metafuron	<i>Metil Metsulfuron</i>	Kg	1.228	46.127	740	31.965
Racumin	<i>Coumatetralyl</i>	Kg	7.896	18.222	-	-
Starlon	<i>Triklopir</i>	Lt	5.119	28.199	1.876	8.779

Based on the data above, there are 2 types of pesticides whose use will increase in 2022, namely pesticides with active ingredients Adjuvant and Sulfantrazan. The increase in the use of pesticides occurred because it referred to company policy No. 002/MEMO-BGA/RSC/1/2022 dated 3 January 2022 regarding adjusting the dose of herbicides (Glyphosate and Ammonium Glufosinate) and replacing them with the active ingredients Adjuvant and Sulfantrazan. This is done as an effort to manage plantations that are environmentally friendly and support the Soil Health program.

However, in general the use of pesticides has decreased, even in 2022 some pesticides will no longer be used.

The company also implements the BGS (BGA Ground Management System) system which aims to reduce the use of pesticides and increase sources of organic matter for plant maintenance activities, including by pruning *Nephrolepis Biserrata*.

In several blocks in each estate, NonChemist blocks are also implemented, meaning that for areas that are protected from weeds, pesticide applications are reduced by reducing spray rotations from 1 to 2 spray rotations per year.

To find out the need for spray volume per hectare, the company calibrates the sprayer, nozzle, 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 Bracheteata 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 results of field observations of these plants include growing in block E52 E53 Division 3 BRYE.

Based on the explanation above, it is concluded that the company already has records of pesticide use and its reduction to a certain extent by substituting environmentally friendly materials/using biological agents for plant maintenance.

### 7.2.4

The Unit of Certification has SOP for Observation and Control of Plant Pest Organisms with Document No. BGAAGRKS-PTKS-PHT and BGAAGRKS-PTKS-PG for weed control. The document describes, among other things:

- Control is carried out based on detection and census results that exceed the economic threshold.
- Explanation 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 for fire caterpillar predators to live. 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 includes 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.

The company has developed beneficial plants including *Turnera Subulata* and *Antigonon leptopus* which are spread across the Division. The company conducts EWS every day against HPT attacks and conducts a census if heavy attacks are found in the block.

Potential pests that exist include rats, horn beetles, and UPDKS, 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 the results of the EWS in March 2022 - February 2023 there were pest attacks between 0% and 4.5%. The company did not conduct a census of the affected blocks because it has a mild attack category, namely rat attack <5%, so it does not require rat pest control using insecticides. The company has also developed a method of preventing and controlling rat pests in a biological way, namely through the development of the natural predator Tyto Alba, including in Block E39 Division 4 BRYE and G58 Division I BLRE. Besides that, based on the results of the census in TRNE, there were no rat attacks

- UPDKS

Based on the results of the EWS for the period March 2022 to February 2023 there were no heavy category UPDKS pest attacks, namely attacks of  $\geq 5$  individuals/one frond so that it did not require 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 D51 D52 E52 E53 Division III BRYE and block H59 Division 1 BLRE. Besides that, based on the results of the census in TRNE, there were no caterpillar attacks

- Oryctes

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 February 2023, no horn beetle attacks were found above 5%, so there was no control using insecticides. Besides that, based on the results of the census in TRNE, there were no *oryctes* attacks.

The company has an IPM program through EWS, which is daily monitoring by special officers and will be followed up with a census if an attack with a severe category is found in these blocks.

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

## 7.2.5

The company shows policies related to limited use of pesticides as stated in the Internal Agriculture & Technical Circular No. 016/IOM/RSC/II/2015 dated May 9 2015 from the Head of Oil Palm Research to all Area Controllers, containing:

- Herbicide class 1A and 1B (Paraquat) will no longer be 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 where *nephrolepis* is found, methyl metsulfuron is not used, but triclopyr is used.

The Unit of Certification 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 stock taking of paraquat in warehouses at PRYE, BLRE, BRYE and TRNE that this type of Paraquat pesticide is no longer used in the certification unit.

Based on the description above, it shows that pesticides that are included in 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 Unit of Certification demonstrates 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 Unit of Certification has a pesticide applicator training program in 2022. Pesticide management training that has been carried out internally, including training in the management and use of chemicals (pesticides) on 13 July 2022 at TRNE which was attended by 14 spray employees and spray foremen at TRNE with EHS Assistant facilitators and Division Assistant. The material presented is related to calibration of spray equipment, road calibration, good and correct methods of spraying 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 PYRE, BLRE, BRYE and TRNE 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 Unit of Certification 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. ASM and PT. GHL 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 Agro Sejahtera Manunggal and PT Gunajaya Harapan Lestari, 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 24 February 2023, which PT Semesta Langgeng Sentosa did as a licensed hazardous waste transporter.

Based on interviews with pesticide application officers at BLRE, PRYE, BRYE, and TRNE, it was found that all containers used for pesticide packaging were returned and sent to the Hazardous Waste Warehouse in PRYM 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. ASM and PT. GHL is done manually and chemist. Based on interviews with chemist foremen and

pesticide applicators at PYRE, BLRE, BRYE and TRNE 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 company has carried out special health checks including routine blood tests and routine urine tests, audiometric examinations, spirometry examinations, cholinesterase examinations and other tests which can be carried out as needed based on certain potential hazards in the workplace.

In 2022 the company will carry out special medical examinations for all specified employees, including:

- PRYE, 46 BGS employees, 35 BMS employees and 2 generator operators
- BRYE, 24 BGS employees and 37 BMS employees
- BLRE, 27 BGS employees, 29 BMS employees and 2 generator operators
- PRYM, 24 office employees, 6 compound employees, 5 laboratory employees, 15 Maintenance employees, and 43 process employees.

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 Unit of Certification 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 medical examination for pesticide operators and evidence of follow-up on the results of the inspection.

#### 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 27 May 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 February 20<sup>th</sup>, 2023 at PYRE there were 23 pesticide management employees with negative results
- On February 12<sup>th</sup>, 2023 at BRYE there were 19 pesticide management employees with negative results
- On February 10<sup>th</sup>, 2023 at BLRE there were 17 pesticide management employees with negative results
- On February 8<sup>th</sup>, 2023 at TRNE there were 12 pesticide management employees with negative results

In addition, based on the results of interviews at PYRE, BLRE, BRYE and TRNE, it is known that the youngest pesticide applicator is 22 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 old.

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

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

#### 7.3.1

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.

### **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 Agro Sejahtera Manunggal and PT Gunajaya Harapan Lestari. The unit of certification also has a licensed hazardous and toxic waste storage area, including Permit for Temporary Storage of Hazardous and Toxic Waste for PT Agro Sejahtera Manunggal based on Decree of Ketapang Regent Number 1491/DPMPSTSP-D.B/2017 dated 13 Desember 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 if 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 PT Agro Sejahtera Manunggal, 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. PT Agro Sejahtera Manunggal 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, PT Agro Sejahtera Manunggal 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.

Meanwhile, based on result of interviews with management representative, PT Gunajaya Harapan Lestari does not yet have a licensed hazardous and toxic waste storage area. The results of the field visit showed that PT Gunajaya Harapan Lestari already has a hazardous and toxic waste storage building located in the Teluk Rengit Estate. PT Gunajaya Harapan Lestari has attached document Letter No. 001/D&L-GHL-Dir.KSS/II/2023 dated 4 February 2023 regarding Application for Integration of PT Gunajaya Harapan Lestari's Technical Details of hazardous and toxic waste into the Environmental Agreement from PT Gunajaya Harapan Lestari to the Public Housing, Settlements and Environment Agency of Ketapang Regency. Thus, PT Gunajaya Harapan Lestari has not been able to show evidence that it has a permit document for Temporary Storage of Hazardous and Toxic Waste issued by relevant agency. This has become **Nonconformity No. 2023.1 with Minor Category**.

The waste stored in the temporary storage warehouse will then be transported by licensed party quarterly. The latest transportation is proven through the Electronic Manifest document and the official report of the transportation carried out on 24 February 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 023/MOU/ASM-SLS/VII/2022 on 23 Juli 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 (24 February 2023) 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 visit to hazardous waste storage warehouses at PT Agro Sejahtera Manunggal and PT Gunajaya Harapan Lestari 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 Agro Sejahtera Manunggal and PT Gunajaya Harapan Lestari of fourth quarter of 2022 which were reported to Public Housing, Settlement Area, and Environmental Agency of Ketapang Regency based on electronic receipt 1677565431-8426.

#### **POME, Solid and Air Waste**

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

Unit of certification does not 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.

#### **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.

#### **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 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 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: Nonconformity No. 2023.1 with Minor Category**
**7.4**
**Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.**
**7.4.1**

The Unit of Certification has procedures for managing soil fertility in SOP No. BGA-AGR-KS-SOP which was ratified on 25 May 2011, including installation and maintenance of drainage systems (SOP-04), water and soil conservation (SOP-05), planting LCC (SOP-06), weeding management (SOP-08) and fertilization (SOP-09), and marginal land management (SOP-16), and related Leaf and soil analysis in internal memo No. 004/IOM/RSC/II/15 dated 07 December 2015 and No. 53/RSC-ADM/XII/15 on December 7, 2015 as the basis for calculating fertilizer recommendations.

Based on the results of interviews and observations at KNDE, STHE, BSRE and SJYE it is known that the certification unit has done the following things:

- Realization of fertilization based on the recommendations of the research department that conducted leaf and soil analysis
- Cultivating LCC such as Mucuna Bracteata and Neprolepis
- Weeding control is carried out selectively
- Arrangement of drainage, monitoring of ground water level and monitoring of peat subsidence

The certification unit will carry out organic fertilization in the form of empty fruit bunches in 2022 which will be carried out in the BRYE unit as much as 22,700 tons, BLRE 5,317 tons, and in the PYRE unit as much as 1,712 tons. While the application of liquid waste from the processing of FFB (POME) in 2022 will be applied to the BRYE unit as much as 288,804 tons.

Based on the results of a field visit regarding the application of liquid waste in Block D50 D51 Division 3 BRYE, it is known that there is no liquid waste coming out of the flat bed and it is still within safe limits from overflow. In addition, based on observations of the results of the application of empty stems in Block H63 H64 H65 Division II BLRE, it is known that empty stems are applied and neatly scattered around the main plant and do not accumulate at one point. All of the plants in the area are seen in well-maintained and well-maintained conditions.

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 Unit of Certification conducts leaf and soil analysis every year by the Research Department of PT. BGA as the basis for fertilizing. Leaf analysis and soil analysis are regulated 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 leaf analysis on April 13-23 2021 by the Analytical Laboratory Research Department of PT. BGA with certificate number 0063L/AL-BGA/INT/IV/2021. The number of leaf samples taken was 6 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 0059S/AL-BGA/INT/VII/2021 on 27 June – 05 July 2021. The number of soil samples taken was 112 soil samples. The nutrient content analyzed included pH, Total N, C-Organic, C/N, P, K, Ca, Mg and CEC.

LSU at TRNE was carried out by the Analytical Laboratory Research Department of PT. BGA with certificate no 0063L/AL-BGA/INT/IV/2021 on April 13-23 2021. The number of leaf samples taken was 6 leaf samples. The nutrient content analyzed included pH, Total N, P, K, Ca, Mg, B and Cu

In addition, SSU in TRNE is carried out by the Analytical Laboratory Research Department of PT. BGA with certificate no 0069L/AL-BGA/INT/VIII/2021 on August 13-24 2021. The number of soil samples taken was 106 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 Unit of Certification has used EFB and Land Applications as an alternative method for managing soil fertility.

The Unit of Certification will carry out organic fertilization in the form of empty fruit bunches in 2022 which will be carried out in the BRYE unit as much as 22,700 tons, BLRE 5,317 tons, and in the PYRE unit as much as 1,712 tons. While the application of liquid waste from the processing of FFB (POME) in 2022 will be applied to the BRYE unit as much as 288,804 tonnes.

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 company 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, including:

- PRYE: HGFB Fertilizer 43 Tons, MOP 65 Tons, NPK 13:6:27+0.65B 2,489 Tons, NPK 12:12:17:2 64 Tons, Dolomite 485 Tons, and Urea 4 Tons
- BRYE: CuSO<sub>4</sub> Fertilizer 22 Tons, HGFB 40 Tons, MOP 55 Tons, NPK 13:6:27+0.65B 1,344 Tons, NPK 13:6:27+0.65B (Sand Area) 1,201 Tons, RP 243 Tons, Dolomite 746 Tons, and TSP 13 Tons
- BLRE: CuSO<sub>4</sub> 14 Tons, HGFB Fertilizer 38 Tons, NPK 13:6:27+0.65B 2,239 Tons, NPK 13:6:27+0.65B (Sand Area) 100 Tons, Dolomite 535 Tons, and TSP 8 Tons
- TRNE: HGFB Fertilizer 40 Tons, NPK 13:6:27+0.65B 2,184 Tons, NPK 13:6:27+0.65B (Sand Area) 41 Tons, RP 355 Ton, and Dolomite 752 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 company has shown the marginal area map as stated in the marginal area map of PT. ASM with a scale of 1: 85,000. The map explains the types of marginal land found in the area of PT. ASM as the table below

ESTATE	MARGINAL AREA (Ha)		
	SPODIK SAND	LOWLAND NONMINERAL	LOWLAND MINERAL
PRYE	202	-	2467
BRYE	1338	429	854
BLRE	226	524	1909
<b>TOTAL</b>	<b>1766</b>	<b>953</b>	<b>5230</b>

In addition, based on semi-detailed soil survey analysis in TRNE, there are 8 soil types namely Sulfaquept, Dystrudept, Plinthudult, Paleudult Shallow, Paleudult Moderate, Paleudult Deep, Haplohumod Deep, and Haplohumod Shallow.

The Unit of Certification has shown the marginal area map as stated in the marginal area. The map explains the types of marginal land found as sporadic sand (1,766 ha), lowland non-mineral soil (953 ha), and lowland mineral soil (5,230 ha).

According to the Table above, it could be concluded that there were fragile soils within estate operational areas, as shown by the presence of peat soil, acidic sulfate minerals and very sandy soil texture. Furthermore, there were also the presence of marginal soils through peat (developed), lateritic and alluvial minerals. Thus, the main limitation of PT ASM and PT. GHL operational areas were due to acidic soils, very sandy soil texture and low fertility.

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

**7.5.2**

The Unit of Certification already has a replanting policy with Document Number BGAAGRKS-PTKS-PRM concerning Replanting which was approved by the COO on 03 June 2010. In these guidelines it is determined that the economic age of oil palm plants is  $\pm$  25 years and after that Replanting must be carried out immediately. Replanting aims to be able to maintain the optimum average age of plants, namely  $\pm$  15 years for the company.

Some of the considerations for replanting are:

- The average FFB production is less than 16 tons/ha
- Cost per Ha and cost price per Kg FFB
- Difficulty of fruit cutting power to cut fruit (tree height above 15 m)
- Consideration of the selling price of CPO and PK in the market
- Availability of capital for replanting
- The location/area of the plant blocks to be replanting

Based on the statement area data of PT. ASM and PT. GHL is known that the year of planting between 2009 to 2014.

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 2034, so this indicator cannot be applied because there are no areas that have been replanted.

**7.5.3**

In the term program of PT. ASM and PT GHL have no new planting plans in the company's operational areas. Based on the statement area of PT. ASM and PT. GHL noted that the company last planted in 2014. In addition, based on a 1:15,000 scale slope map made by the GIS Department, it is known that the slope of the area is between 0-13% and there are no steep areas with a slope of more than 20%.

Based on the description above, it shows that the company does not plant oil palm on steep slopes.

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

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

**7.6.1**

The Unit of Certification shows the soil map obtained from the PT ASM and PT GHL land surveys. The report informs that most of the land in Unit of Certification is classified as marginal (S3) due to several conditions, such as the presence of shallow peat (hemist), acid soil, sandy soil areas, laterite layers, lowland areas, low fertility soils, 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 topographical maps and land surveys in the management and development of planting areas such as the construction of roads, bridges, sluice gates, ditches and other infrastructure.

Based on the description above, it shows the 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 *Neprolepis*
- Organic fertilization in the form of empty pods
- Liquid waste 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 best management practices.

### 7.6.3

Based on the topographic map it is known that the entire area of PT. ASM and PT. GHL consists of flat slopes to gentle slopes, namely 0-13%, and there are no areas with steep slopes (25-40%). In addition, based on the results of field observations at PT. ASM (PRYE, BLRE, BRYE) and PT. GHL (TRNE) is known to have no land with steep or very steep slopes. Unit of Certification has used this topographic and land survey information to determine the water gate, among other things, so that it can maintain water availability. In addition, it is used to make transport roads other than piling roads 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

The Unit of Certification showed the results of the identification of peat areas in the HGU area of PT. ASM and PT. GHL, it is known that some units in BLRE and BYRE are peat areas with a peat depth of less than 3 meters covering an area of 887.40 Ha consisting of 259.38 Ha Haplofibrist peat and 628.02 Ha Haplosapists. As for PRYE and TRNE, all of them are mineral and sandy areas. Based on the statement area data at PT. GHL and PT. ASM noted that planting was carried out from 2009 to 2014, so there was no planting after 2018.

Based on the description above, it shows that there have been no new plantings on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, or in new development areas.

### 7.7.2

The Unit of Certification has carried out an inventory of peatlands in accordance with the RSPO peat inventory template and reports have been made to the RSPO as evidenced by an email sent by Devaladevi Sivaceyon (devaladevi@rspo.org) to Martin M (martin.mach@bumitama) .com) on 31 October 2019 with email subject: Bumitama RSPO Peat Inventory and has been declared correct.

The company re-showed proof of delivery of peat inventory to RSPO (ghg@rspo.org) on March 29, 2021, which explained the inventory of all peat areas in PT ASM with a total area of 887.40 Ha.

Based on the description above, it shows that the peat areas that are in the company's operations have been inventoried, documented, and reported to the RSPO Secretariat

### 7.7.3

The Unit of Certification has 7 subsidence stakes that have been installed since 2018. The company has measured subsidence stakes once every 1 month and based on the results of the 2018-2022 subsidence stake measurement it is known that the rate of subsidence of the peat is between 1.00 cm and 3.10 cm / year with a total soil subsidence rate until January 2023 of 12 cm. This is in accordance with the results of field observations in block E64 Division 4 BRYE.

The Unit of Certification has also measured the water level and water table (Piezometer) once a week at 7 points, namely at BRYE Division 4 Block E64 and E61, as well as at BLRE Division 2 Block F60 G62 F64 G59 and Division 4 Block J72. Based on the results of the water level measurement in the 4th week of February 2023, it is known that the water level is between 30-45 cm below the ground surface. Meanwhile, based on the results of the water table (Piezometer) measurement on the 4th week of February 2023, it is known that the water level is between 26 – 55 cm below the ground surface. The water level varies every week, this is due to

differences in the volume of 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 can be concluded that the company made arrangements for lowering the high peat soil layer.

#### 7.7.4

The Unit of Certification has measured the water level and water table (Piezometer) once a week at 7 points, namely Blocks E61a, E64a, F60a, F64a, G59a, G62a and J72a. Based on the results of the water level measurement on the 3rd week of February 2023, it is known that the water level is between 30 – 45 cm. Meanwhile, based on the results of the water table (Piezometer) measurement on the 3rd week of February 2023, it is known that the water level is between 26 – 51 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 statement area data of PT. ASM and PT. GHL It is known that planted between 2009 and 2014. 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, which is around 2034. The oldest plants at PT. GHL and PT. ASM is 14 years old and until now there is no plan for a replanting program, so this indicator cannot be applied because there is no replanting program.

#### 7.7.6

PT. ASM and PT. GHL has not new planting palms and since 2014 PT. ASM and PT. GHL does 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.

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 regulations.

#### 7.7.7

PT. ASM and PT. GHL has not new planting palms and since 2017 PT. GHL and PT. ASM has a conservation area. Based on a document review, field observations and interviews with the Estate Manager, it is known that the company has managed its operational areas well, including maintaining conservation areas, selective weed control, reducing the use of pesticides and optimizing biological pest control, monitoring water level and subsidence of the peat.

<b>Status: Comply</b>
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### 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 AMDAL in 2010 and HCV Identification in 2012 of PT Agro Sejahtera Manunggal, as well as AMDAL in 2012 and HCV Identification in 2012 of PT Gunajaya Harapan Lestari and documents on the identification of high conservation value areas in 2012.

Unit of certification also conducted regularly water quality testing every semester for Muara Kendawangan River, Kendawangan River, Kediuk River, River, Bengkuang River, and Belaban River in PT Agro Sejahtera Manunggal and Belian River, Kelik River, Malang Pinggan River, Nenek Unah River, Perepat Tunggal River, Teluk Dalam River, Teluk Pumpun River, Tg Rotan River, and Toip River of PT Gunajaya Harapan Lestari which refer to the threshold set up in Government Regulation No. 22 of 2021. Last water quality testing was conducted on 27-28 September 2022 by accredited laboratory No. LP-547-IDN. There are several parameters that pass the quality standard, namely pH, BOD and COD in Muara Kendawangan River, Kendawangan, Kediuk River, Muara Membuluh River, Membuluh 1 River, Membuluh 2 River, Bengkuang River, dan Belaban 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 AMDAL in 2010.

Unit of certification also conducts groundwater quality testing. Results of groundwater quality analysis of PT Agro Sejahtera Manunggal and PT Gunajaya Harapan Lestari on 27-28 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.

### 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 Unit of Certification chemical application area in color. In addition, unit of certification also conducts socialization to employees and the surrounding community in conservation efforts which can be proven based on the minutes of socialization to workers and to community on 30 March 2022. Interviews with spraying and fertilizing workers in PT Agro Sejahtera Manunggal and PT Gunajaya Harapan Lestari 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.

Wet streams in PT Agro Sejahtera Manunggal area are protected by the company. This is evidenced by the results of field observations in Bengkuang River Border area in Block D39-40 Bengkuang Raya Estate that showed the river border is protected by the company. Some of the activities carried out by the company are placing signs as limits for chemical application and planting *Pulai*, *Matoa*, *Cempedak* plants, etc. In addition, there are no traces of chemical application in the tributary border and there are no oil palm plantations in the river border area and there is a boundary between oil palm plantations and the river border area. In addition, the company also does not have a replanting plan in the next 3 years.

Based on the results of the document review, PT Gunajaya Harapan Lestari conducted an HCV study in 2012 and determined the HCV area within PT Gunajaya Harapan Lestari's HGU area based on Internal Office Memo No. 013/IOM-7A/SUST/01/2023 dated 13 January 2023 stipulated by Area Controller 7A regarding the determination of PT Gunajaya Harapan Lestari's HCV Area. Based on the document, it was obtained that the HCV area was 115.01 ha which was the HCV area within PT Gunajaya Harapan Lestari's HGU, including Kelik River riparian area of 13.69 ha, Perepat Tunggal River riparian of 4.99 ha, and Malang Pinggan River riparian of 8.16 ha which is included in HCV 1.1, HCV 1.2, HCV 4.1. In addition, recommendations for management and monitoring based on the document include the establishment of HCVs and their supporting buffers, installation of boundary markers, installation of information boards (nameplates, boards prohibiting burning, encroaching on or destroying HCV areas), outreach and supervision and imposition of sanctions for violators.

Based on the results of a field visit to the HCV area in Teluk Rengit Estate at PT Gunajaya Harapan Lestari, the following is known:

- Spray marks on the border of the Malang Pinggan River riparian Block B26.
- There is no limit to the application of chemicals (such as fertilizers and pesticides) on the Malang Pinggan River riparian Block B26, Kelik River riparian Block B16, and Perepat Tunggal River riparian Block C03.
- There are no HCV warning boards on the Malang Pinggan River riparian Block B26 and Perepat Tunggal River riparian Block C03.
- There are oil palm plants that have already been planted. Based on the Teluk Rengit Estate Planting Year Map, oil palm on the banks of the Malang Pinggan River was planted in 2012, on the banks of the Kelik River in 2012, and on the banks of the Perepat Tunggal River in 2013.

PT Gunajaya Harapan Lestari has shown the following documents:

- PT Gunajaya Harapan Lestari High Conservation Value (HCV) Report Semester I-II 2022 which includes 3 units of setting up boundary markings on the Kelik River riparian, 3 units on the Belian River riparian, 5 units of coastal & mangrove ecosystem buffers and 5 units of long hills on Semester I 2022. Meanwhile, the installation of boundary signs in Semester II 2022 will be carried out on the hills of Teluk Pumpun and *Rawa Merah* for 5 units each.
- PT Gunajaya Harapan Lestari High Conservation Value Management Activity Plan for 2022 and 2023 with activities in the form of installing boundary markers, installing signboards/warning boards, rehabilitation and enrichment, outreach to the community and employees, as well as patrolling the maintenance of boundary markers and nameplates and prohibitions.
- Minutes of the Rehabilitation Plan which were set on March 3, 2023 and approved by the Estate Manager of Teluk Rengit Estate at PT Gunajaya Harapan Lestari. The rehabilitation plan includes area determination, seed preparation, land preparation, planting and maintenance carried out on the banks of the Belian River, Kelik River, Malang Pinggan River, Grandma Unah River, Perepat Tunggal River, Teluk Dalam River, Teluk Pupun River, Tg Rotan River, and Toip River.

Based on the RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or the Simplified Guide Management and Rehabilitation of Riparian Reserves (2018), it is known:

- The recommended width for river basin buffers is 10-20 m wide i.e., 20 m on both banks of the river.
- Threats must be identified and managed on a case-by-case basis including human encroachment (including illegal logging, clearing of lagoons, etc.), fire prevention, wildlife protection, and soil and riverbank erosion (there are regular plantation activities).

Thus, PT Gunajaya Harapan Lestari has not shown evidence that it has protected water flows in accordance with the 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or the Simplified Guide Management and Rehabilitation of Riparian Reserves (2018). This has become **Nonconformity No. 2022.2 with Major Category**.

### 7.8.3

In liquid waste management, unit of certification uses a Wastewater Treatment Plant (WWTP) which will then be used as a substitute for fertilizer in the Land Application (LA). The company already has a Land Application (LA) Permit in the form of Wastewater Utilization Permit based on Decree of Ketapang Regent number 256/DPMPSTP-D.B/2019 dated 8 May 2019 concerning Permit for Utilization of Wastewater to Soil for Application on Soil at the Oil Palm Plantation of PT Agro Sejahtera Manunggal covers an area of 282.31 Ha (28 Blocks) located in Kendawangan District, Ketapang Regency. The decision is valid for 5 (five) years. The permit also explains which locations are in blocks of B36-B41, C42-C43, D42-D53, E42-E43, dan E46-E51.

Unit of certification 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 laboratory (LP-966-IDN) with reference to the Decree of Ministry of Environment Number 29 of 2003. Monitoring the quality of wastewater at the outlet shows the results. Parameters monitored meet environmental quality standards. Based on the analysis of the test documents of test results of liquid waste for the period May 2022-January 2023, it shows that all the parameters tested are in accordance with the applicable quality standards. This shows that the liquid waste generated from FFB management activities is feasible to be applied to land (Land Application). For example, the test results in the period December 2022 with the results of BOD 4698 (threshold: <5,000) and pH 7.26 (threshold: 6-9).

**7.8.4**

The company can show records of water use for the period January-December 2022. Based on this data, the average water use for the FFB processing process is 29,139 M3/Month while the total water use is 349,669 m3/Year. The budget for water use is 1.30 m3/ton FFB, while the actual water usage is 1.00 m3/ton FFB. The use of water is still in accordance with the established water usage budget.

The company has shown the Water Resources Exploitation Permit Technical Recommendation document for Mill and Domestic Activities in Ketapang District, West Kalimantan Province Number SA0203-BWS24/225 dated March 31, 2022. The technical recommendation states that the company is required to apply for a water resources exploitation permit at the latest within 60 calendar days from the issuance of technical recommendations. The company has sent an application for a permit to exploit water resources on May 20, 2022 via email to the permitsda@pu.go.id. The company has shown document Letter No. SA.0203-Da/2056 concerning the Licensing Process for the Exploitation of Natural Resources and the Use of Natural Resources issued by the Ministry of Public Works and Public Housing on October 20, 2022, which states that the application for permits submitted will be processed following regulations related to the application for permits for exploitation of water resources.

Based on the explanation above, the company already has a document on the use of water for the FFB processing process, and the process of issuing an extension of the water resource concession permit will be verified again at the time of the next assessment.

**Status: Nonconformity No. 2023.2 with Major Category**

**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 fibre. 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 *Perhitungan Efisiensi Energi* PRYM POM on 2022. Directly, the unit of certification already maximizing the use of renewable energy (fibre & shell) as boiler fuel. For example, use of shells and fiber period January-December 2022 has produces 139,510 kWh of electricity from turbine. Renewable energy use per ton of palm product in the mill is 1.73 kwh/ton CPO produced. Result direct fossil fuel used is 2.81 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 minimize GHG emissions.**

**7.10.1**

Unit of certification also has conducted GHG emission calculations period January-December 2022 use of Calculator Palm GHG version 4.0. Accurate data has been put into the RSPO PalmGHG Calculator (Palm GHG version 4.0) and has been verified. Summary of net GHG emissions from PalmGHG calculator of the audit report which calculation option is applied "Apply full Version".

Summary of Net GHG Emissions

Emission per product	tCO2e/tProduct
CPO	1.08
PK	1.08
Production	t/yr
FFB processed	349,586.47
CPO produced	80419.92
PK produced	16910.33



Extraction	%
OER	23.00
KER	4.84

Land use	Ha
Planted area on mineral	21584.79
Planted on peat	951.60
Total area planted	22536.39
Conservation Area (Forested)	63.55
Conservation Area (Non-Forested)	169.10
FFB Production per hectare	22.98

Summary of field emission and Sinks

Description	Own		Group		3rd Party		Total
	tCO2e	tCO2e/t FFB	tCO2e	tCO2e/t FFB	tCO2e	tCO2e/t FFB	
Emission Source							
Land Conversion	24660.57	0.24	15305.60	0.40	44344.28	0.00	84310.45
CO2 Emissions from Fertiliser	9224.81	0.09	4332.77	0.11	16394.81	0.00	29952.39
N2O Emissions from Peat	6642.86	0.06	76.24	0.00	0.00	0.00	6719.10
N2O Emissions from Fertiliser	4677.07	0.05	2128.54	0.06	7943.70	0.21	14749.31
Fuel Consumption	216.24	0.00	915.08	0.02	2684.90	0.00	3816.22
Peat Oxidation	48452.03	0.47	556.07	0.01	0.00	0.00	49008.10
Sinks							
Crop Sequestration	-45694.80	-0.45	-	-0.68	-	0.00	-152051.99
			26123.09		80234.09		
Sequestration in Conservation Area	-586.88	-0.01	0.00	0.00	0.00	0.00	-586.88
Total	47591.91	0.47	-2808.78	-0.07	-8866.41	0.00	35916.71

Summary Oil Mill Emissions and Credits

Remarks	tCO2e	tCO2e/t FFB
Emissions sources		
POME	68524.87	0.20
Fuel consumption	610.50	0.00
Grid electricity	0.00	0.00
Credits		
Export of grid electricity	-6.69	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	69128.68	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
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Divert to methane capture (flaring) (%)	0
Divert to methane capture (electricity generation) (%)	0

**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 16 December 2022.

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 accredited laboratory (LP-195-IDN) on 26-27 September 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 11 of 2021 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 30 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.

Based on document review and interviews with company representatives, it was found that there were no new developments. The company has identified the source of pollution in the mill and estate, the document informs the source (station/activity), pollution and emission sources, impacts (human, work equipment, environment) and impact control. For example, from the boiler it produces boiler ash, steam and chemical pollution, from the engine room it produces pollution in the form of noise.

<b>Status: Comply</b>
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**7.11**

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

**7.11.1**

Based on the verification of the area statement document, it was found that there were no new plantings or replanting activities carried out by unit of certification. The results of field observations during the audit activity did not find any traces of land burning by the unit of certification. 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.

**7.11.2**

In determining land fire prevention and control measures, the company carries out several activities, namely:

- Fire emergency response simulation training for employees, for example on 13 February 2023, which was attended by the Estate and Mill Fire Task Force.
- Unit of certification has an emergency response team to handle fire emergencies. Unit of certification already has an emergency response team for every estate and factory.
- Unit of certification has facilities and infrastructure for emergency response prevention and management of land fires.
- Conducting socialization of land fires to the surrounding community, for example on 13 February 2023 which was attended by 20 participants around the unit of certification.
- Monitoring land fires through fire patrols, hot spots (hotspots), and through fire towers which are carried out every day. For example, the results of fire monitoring for the January 2022 period revealed that there were no hotspots in the unit of certification area.

The auditor team has also carried out fire control simulations for the fire task force team at Pembangunan Raya Estate, Bengkuang Estate, and Teluk Rengit Estate as well as testing the unit of certification's fire control facilities and infrastructure. The simulation results show that the unit of certification's fire task force team can run the simulation well and firefighting equipment can be used at any time.

### 7.11.3

Unit of certification has also involved stakeholders in adjoining locations for fire prevention and control measures by conducting socialization of land fire control to the community, for example socialization was conducted on 13 February 2023 which was attended by 20 participants around the unit of certification. The results of interviews with representatives of the village community around the unit of certification revealed that the unit of certification had socialized fire control to the community. In addition, in the unit of certification area there is also a signboard prohibiting land burning activities and the dangers of land fires.

**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 and 7.12.8

Unit of certification cleared land after November 2005 without prior identification of HCVs. Based on the Plantation Document Review, unit of certification started planting oil palm from 2009–2012 and HCV identification was carried out in 2011. In this regard, unit of certification has conducted a land use change analysis conducted by PT ATA Marie in 2016 for PT Agro Sejahtera Manunggal and by PT Gunajaya Harapan Lestari itself in 2021. Result if verification shows that there are 3 documents of land use change analysis as follow:

- LUC Analysis Verification Result Document for PT Agro Sejahtera Manunggal which has been covered 4,206.27 ha which has been endorsed by RSPO on 29 January 2018. Total area for conservation liability is 768.72 ha.
- LUC Analysis Verification Result Document for Agro Sejahtera Manunggal (Plasma) which has been covered 3121.13 ha which has been endorsed by RSPO on 29 January 2018. Total area for conservation liability is 0 ha.
- LUC Analysis Report for PT Gunajaya Harapan Lestari which has been covered 2,250.92 ha which has been endorsed by RSPO on 15 June 2021. Total area for remediation responsibility is 37.25 ha.

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 results, Henceforth, the RaCP process for Bumitama are now completed and you may proceed with certification." Based on these email, PT Agro Sejahtera Manunggal and PT Gunajaya Harapan Lestari LUCA and Compensation Plan status was declared Satisfactory by RSPO with total compensation liability of 768.72 ha for PT Agro Sejahtera Manunggal and 37.25 ha for PT Gunajaya Harapan Lestari. Until this assessment, company did not conduct new land clearing activities or development of operational areas.

#### 7.12.2

The first planting year was carried out in 2009. 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:

- Identification and Analysis of Existence of High Conservation Values (HCV) in Permit Area of PT Agro Sejahtera Manunggal 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 20-25 April 2011. This study covered area of 8000 ha of PT Agro Sejahtera Manunggal. Based on the results of identification, area of 126.02 Ha of HCV was obtained. Based on result of study, the unit of certification conducted public consultation on HCV on 21-22 April 2011 which was attended by 93 participants who were company representatives and representatives of the surrounding village community and representatives of the sub-district. Peer review conducted by Dr. Kunkun Jaka Gurmaya on 27 August 2012.
- Identification and Analysis of Existence of High Conservation Values (HCV) in Permit Area of PT Gunajaya Harapan Lestari 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 19-25 April 2011. This study covered area of 3000 ha of PT Gunajaya Harapan Lestari. Based on the results of identification, area of 290 Ha of HCV was obtained. Based on result of study, the unit of certification conducted public consultation on HCV in April 2011 which was attended by company representatives and representatives of the surrounding village community and representatives of the sub-district. Peer review conducted by Dr. Kunkun Jaka Gurmaya on 27 August 2012.

### 7.12.3

Based on the notice on the RSPO website it is known that the High Forest Cover Landscapes and High Forest Cover Countries have not been established by the RSPO. So that this standard has not yet been assessed.

### 7.12.4

Unit of certification already has an HCV program for 2022/2023 based on the results of the evaluation of the realization of HCV management in the previous period which is carried out annually. The plan contains a plan for management, monitoring, time management and the person in charge of implementation. The HCV management matrix describes the management plan consisting of:

- Socialization of the existence of HCV areas to employees and the surrounding community.
- Installation of Boundary Marks.
- Signboard Installation and Maintenance.
- Rehabilitation and Enrichment.
- HCV Patrol and Boundary Patrol.
- Monitoring the presence of wildlife.

Based on the results of the document review, the company conducted an HCV study in 2012 and determined the HCV area within PT GHL's HGU area based on Internal Office Memo No. 013/IOM-7A/SUST/01/2023 dated 13 January 2023 stipulated by Area Controller 7A regarding the determination of PT GHL's HCV Area. Based on the document, it was obtained that the HCV area was 116.01 ha which was the HCV area within PT GHL's HGU, including the Kelik River riparian area of 13.69 ha, the Perepat Tunggal River border of 4.99 ha, and the Malang Pinggan River border of 8.16 ha which is included in HCV 1.1, HCV 1.2, HCV 4.1. In addition, recommendations for management and monitoring based on the document include establishing HCVs and their supporting buffers, installing boundary markers, installing information boards (nameplates, signs prohibiting burning, encroaching on or destroying HCV areas), outreach and monitoring and imposing sanctions on violators.

Based on the results of a field visit to the HCV area in Teluk Rengit Estate at PT Gunajaya Harapan Lestari, the following is known:

- Spray marks on the border of the Malang Pinggan River Block B26.
- There is no limit to the application of chemicals (such as fertilizers and pesticides) on the Malang Waist River Block B26, the Kelik River Block B16, and the Perepat Tunggal River Block C03.
- There are no HCV warning boards on the Malang Waist River Block B26 and the Perepat Tunggal River border Block C03.
- There are oil palm plants that have already been planted. Based on the TRNE Planting Year Map, oil palm on the banks of the Malang Waist River was planted in 2012, on the banks of the Kelik River in 2012, and on the banks of the Perepat Tunggal River in 2013.

PT Gunajaya Harapan Lestari has shown the following documents:

- PT Gunajaya Harapan Lestari High Conservation Value (HCV) Report Semester I-II 2022 which includes 3 units of setting up boundary markings on the Kelik River riparian, 3 units on the Belian River border, 5 units of coastal & mangrove ecosystem buffers and 5 units of long hills on Semester I 2022. Meanwhile, the installation of boundary signs in Semester II 2022 will be

carried out on the hills of Teluk Pumpun and Rawa Merah for 5 units each.

- PT Gunajaya Harapan Lestari KBKT Management Activity Plan for 2022 and 2023 with activities in the form of installing boundary markers, installing signboards/warning boards, rehabilitation and enrichment, outreach to the community and employees, as well as patrolling the maintenance of boundary markers and nameplates and prohibitions.
- Minutes of the Rehabilitation Plan which were set on March 3, 2023 and approved by the Estate Manager of Teluk Rengit Estate at PT Gunajaya Harapan Lestari. The rehabilitation plan includes area determination, seed preparation, land preparation, planting and maintenance carried out on the banks of the Belian River, Kelik River, Malang Pinggan River, Grandma Unah River, Perepat Tunggal River, Teluk Dalam River, Teluk Pupun River, Tg Rotan River, and Top River.

Based on the explanation above, unit of certification has not conducted HCV management based on a predetermined HCV management plan. This has become **Nonconformity No. 2023.3 with Major Category**.

#### 7.12.5

Based on document verification, it was found that there were HCV 6 (sacred places) in PRYE. Interviews with community leaders in Seriam Village obtained information that there are no HCV areas that overlap with local community rights. The entire HCV area, including the HCV 6 area, is located on PT Agro Sejahtera Manunggal's Cultivation Rights (HGU) land. Besides, based on document verification of HCV Identification in PT Gunajaya Harapan Lestari, it is known that there is no HCV 6 in PT Gunajaya Harapan Lestari.

#### 7.12.6

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

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

- Minutes of HCV socialization including the presence of important species were conducted on 10 February 2023 to 38 participants of PT Gunajaya Harapan Lestari.
- Minutes of socialization of HCVs including the presence of important species were conducted on 10 February 2023 to 10 participants Sub Village Pulau Bawal and 19 December 2022 to 16 participants of Seriam Village.
- Minutes of socialization of HCV and important species conducted on 30 March 2022 which was attended by 12 participants of PT Agro Sejahtera Manunggal.

Based on interviews with harvest, spray and fertilizer officers at PT Agro Sejahtera Manunggal and PT Gunajaya Harapan Lestari, it is known that unit of certification prohibits workers from keeping protected animals and plants and is prohibited from catching, hunting, and killing animals as well as prohibiting the destruction of HCV areas.

#### 7.12.7

Monitoring of protected areas in 2022-2023 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 Agro Sejahtera Manunggal and PT Gunajaya Harapan Lestari 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 in 16 January 2023, for example:

- Monitor habitat conditions and threats/disruptions
- Rehabilitation and Enrichment
- Monitoring cases of fire incidents and the area of land burned



<ul style="list-style-type: none"><li>• Monitor the condition of the signs and employees' understanding of the signs</li></ul>		
	<b>Status: Nonconformity No. 2023.3 with Major Category</b>	

**3.2 Conformity Checklist of Certificate and Trademark Use**

<b>1.</b>	<b>Evidence of permission or approval certificate and logo from Certification Body which submitted by Client</b>	<b>X or ✓</b>
<b>ASA-4</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-4</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-4</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-4</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).

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	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 Windu Nabatindo Sejahtera</b></p> <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 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>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<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 Gagag 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 Windu Nabatindo Sejahtera</b>, there is no new planting after January 1<sup>st</sup> 2010.</p> <p><i>Auditor verification</i> 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> 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> 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>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
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 District 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 District Kotawaringin Barat No.590/105/Pem-XI/2012, November 21 2012 for areal 9,000 Ha.</li> <li>Location Permit SK District 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 District 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> <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 Windu Nabatindo Sejahtera</b></p> <ul style="list-style-type: none"> <li>Izin Prinsip Arahan Lokasi No. 02.04.28/525.26/463/XI/Ek bang/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/Ek bang/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/Ek bang/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>



Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<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 ASA-2 + ASA 3

<b>NCR No.</b>	<b>: 2022.01</b>	<b>Issued by</b>	<b>: Sentot Adi Subandono</b>
<b>Date Issued</b>	<b>: 10 June 2022</b>	<b>Time Limit</b>	<b>: 08 September 2022</b>
<b>NC Grade</b>	<b>: Major</b>	<b>Date of Closing</b>	<b>: 28 August 2022</b>
<b>Standard Ref. &amp; Requirement</b>	<b>: 2.1.1</b> <b>The unit of certification complies to relevant regulations.</b>		
<b>Evidence observed (filled by auditor)</b>  <b>1. Boiler Operators</b> <ul style="list-style-type: none"> <li>Regulation of the Minister of Manpower and Transmigration No. 01 of 1988, in Appendix 1 it is explained that for a boiler capacity &gt;20 T/h - &lt;40 T/h, 1 person class I operator and 1 class II operator are required for each shift, and for a boiler capacity &gt;40 T/h - &lt;60 T/h requires 1 class I operator and 2 class II operators.</li> <li>Based on field observations, interviews with workers and Mill Managers, as well as a review of PRYM 2022 machine inventory documents, it is known that PRYM has 2 boiler machines (steam) with a capacity of 40 tons/hour each. The results of the interview were also informed that the factory worked 2 shifts, and already had 3 SIO Class I Steamers which had been shown to the Auditor, but the number was not in accordance with applicable regulations.</li> </ul> <b>2. Engine room Operators and Electrician Expert</b> <ul style="list-style-type: none"> <li>Regulation of the Minister of Manpower and Transmigration No. 12 of 2015 in Article 7 it is explained that for companies that have power plants of more than 200 kVA, they are required to have OHS Experts in the field of Electricity.</li> <li>Regulation of the Minister of Manpower and Transmigration No. 38 of 2016 in Articles 110, 111 and Table E it is explained that for a prime mover engine with a power of &gt; 214.47 HP, one person must have a power and production aircraft operator for class I and class II each.</li> <li>Based on field observations, interviews with workers and Mill Managers, as well as a review of the PRYM 2022 machine inventory document, it is known that PRYM has 2 turbines, each 1,600 kw (2,145.64 kva), 1 generator 320 kva, and 2 generators 524 kva. The results of the interview also revealed that PRYM has 3 operators at the engine room station who apparently do not have an OHS license.</li> </ul> <b>3. Certified Welder</b> <ul style="list-style-type: none"> <li>Regulation of the Minister of Manpower and Transmigration No. 2 of 1982 in Article 2, it is explained that this regulation covers the qualification of welders for welding skills of welded joints.</li> <li>Based on field observations, interviews with workers and Mill Managers, it is known that PRYM has welding equipment and the existing welders do not yet have a license as a welder.</li> </ul>			
<b>Non-Conformance Description (filled by auditor):</b>  Based on this, it is known that the company has not been able to show sufficient evidence: <ol style="list-style-type: none"> <li>Boiler Operators in accordance with Regulation of the Minister of Manpower and Transmigration No. 01 year 1988.</li> <li>Engine room Operators in accordance with Regulation of the Minister of Manpower and Transmigration No. 38 of 2016.</li> <li>Electrical OHS Expert in accordance with Regulation of the Minister of Manpower and Transmigration No. 12 of 2015.</li> <li>Certified welder in accordance with Regulation of the Minister of Manpower and Transmigration number 2 of 1982.</li> </ol>			
<b>Root Cause Analysis (filled by organization audited):</b> Lack of knowledge from the unit manager and EHS mill (still new) regarding mandatory competencies based on applicable regulatory/ regulatory requirements.			

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

1. Socialization & Refresh regarding mandatory training needs in accordance with laws and regulations
2. Identifying mandatory training needs
3. Create training programs for mandatory training
4. Implementation of training in collaboration with OHS support Company.

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

Conduct monitoring and evaluation related to mandatory training needs in P2K3 meetings and through internal audits every year and evaluation is also carried out through management review meetings.

**Assessor Evaluation and Conclusion (filled by auditor):**
**Auditor Verification August 18, 2022**

The company has identified the root cause analysis, corrective actions, and preventive actions that have been accepted. The company also shows evidence of improvement, as follows:

1. Minutes of socialization to unit leaders (estate, Mill, and traction) related to OHS competency standards according to the law, dated July 7, 2022. The socialization was attended by managers, Administration Head, EHS, and other relevant staff.
2. Identify the company's OHS license requirements that have been approved by Area Controller 7A. have been identified such as Electrician OHS Expert for Mill, OHA expert for Mill, OHS Expert of fire for area, OHS License of Boiler, OHS License production engine, welder license, etc.
3. The 2022 training program that has been approved by Area Controller 7A, includes training for class 1 steamers, engine room operators, class 3 welders, and electricians.
4. PJK3 certificate dated June 7, 2022, numbered PUB231/SKT-FS172/VI/2022 regarding representatives from PT BGA with the initials WA and WPD who have participated in electrical OHS expert coaching on May 17 – June 7, 2022.
5. Certificate of Area Controller 7 dated August 16, 2022 regarding the appointment of PT ASM's Electrical OHS Expert with the initials WPD.
6. Offer inhouse training from PJK3 for OHS licenses for boiler operators, power and production aircraft, welders, and electricians.
7. Communication between the company and PJK3 via email on August 24 regarding the approval of the cooperation in the implementation of inhouse training for steam aircraft training which will be planned for August 29 – September 03 2022. The email also informs PJK3 for the participation of OHS licenses for 2 engine room operators, 4 welders, and 2 electricians in public training. However, it has not been shown. However, there is no evidence of cooperation in fulfilling the OHS license to the related PJK3 and or confirmation of the participation of the K3 license participants from PJK3.

The company has identified root cause analysis, corrective actions, and preventive actions that have been accepted, but there are still records for proof of corrective actions, namely proof of registration/cooperation with PJK3 for OHS licenses. Based on this, the non-conformance is declared **not fulfilled**.

**Auditor Verification August 28, 2022**

The company has added proof of improvement in the form of a certificate from PJK3 number 20214/PT/PJU/VIII/2022 dated August 26, 2022 regarding the implementation of the certification of class 1 steam and engine room operators in house. For OHS certification training for welders, general OHS expert, electrical technicians, and first aid workers in the workplace through public training. PJK3 has also included participants from PT ASM and the date of implementation.

Based on the additional proof of improvement sent, the non-conformance is declared to have been met and will be re-observed at the next audit.

**Verified by** : **Sentot Adi Subandono**

<b>NCR No.</b>	<b>: 2022.02</b>	<b>Issued by</b>	<b>: Rindu Galih Rezza Rachmansyah</b>
<b>Date Issued</b>	<b>: 10 June 2022</b>	<b>Time Limit</b>	<b>: ASA-4</b>
<b>NC Grade</b>	<b>: Minor</b>	<b>Date of Closing</b>	<b>: 4 March 2023</b>
<b>Standard Ref. &amp; Requirement</b>	<b>2.2.2</b> <b>All contracts, including those with FFB suppliers, have separate clauses regarding the fulfillment of relevant legal obligations, and can be proven by the relevant third party.</b>		
<b>Evidence observed (filled by auditor):</b>  <p>The company has cooperation with 11 stakeholders who are third parties (1 contractor, 4 transporters and 6 suppliers) in the existing plantation operations. From these third parties, the auditors have conducted document reviews and interviews at the time the audit activities were carried out, the following facts were obtained:</p> <ul style="list-style-type: none"> <li>Interviews with representatives from PT Karya Ragam Indo Agung revealed that the contractors have known to always comply with the laws and regulations (such as minimum wages, child labor, PPE, BPJS and others) that apply in Indonesia and this has been stated in the Letter of Agreement. The contractor also admits that it has complied with all relevant regulations in plantation activities (minimum wage, child labor, PPE, BPJS and others), but this has not been proven in document by the contractor or the company regarding the fulfillment carried out.</li> <li>Interviews with the transporters of FFB (Mr. Riyanto), CPO (CV Kawira Putra) and PK (PT Surya Adi Jaya Kapuas) it was found that the contractors knew to always obey the laws and regulations (such as minimum wages, child labor, PPE, BPJS and others) applicable in Indonesia and this has been stated in the Letter of Agreement. The contractor also acknowledges that it has complied with the relevant regulations in plantation activities (minimum wage, child labor, PPE, etc.) except for BPJS because not all workers have been registered, but this has not been proven in writing by the contractor or the related company fulfillment is done.</li> <li>Contractor evaluation documents for PT Surya Adi Jaya Kapuas and CV Kawira Putra conducted on June 1, 2022 where the evaluation has criteria for compliance with OHS &amp; Environment, employment (age, worker wages and BPJS Health), availability of access for information needs by certification bodies and others. The result of the evaluation is that PT Surya Adi Jaya Kapuas got a score of 96 and CV Kawira Putra got a score of 90. However, the results of this evaluation have not been proven by the company or the contractor.</li> <li>The evaluations mentioned above have only been shown for 2 transporters, while the other 2 transporters and 1 contractor have not yet been able to show proof of their evaluation.</li> </ul>			
<b>Non-Conformance Description (filled by auditor):</b>  <p>The company has not been able to prove that all contracts, including contracts with FFB suppliers, have separate clauses regarding the fulfillment of relevant legal obligations, and can be proven by the relevant third party.</p>			
<b>Root Cause Analysis (filled by organization audited):</b> <ul style="list-style-type: none"> <li>Lack of knowledge from the PIC unit that evaluates contractors and understanding when the assessment must be based on the evidence shown</li> </ul>			
<b>Correction (filled by organization audited):</b> <ul style="list-style-type: none"> <li>Conduct training for PICs who evaluate contractors/evaluators</li> <li>Attach the latest contractor evaluation</li> <li>Attaching BPJS Employment and Health/ KIS data that has not been shown / as an attachment to the basic contractor evaluation</li> </ul>			
<b>Corrective Action (filled by organization audited):</b> <ul style="list-style-type: none"> <li>Monitoring is carried out through RSPO internal audit activities and will be reviewed periodically through Management Review Meetings</li> </ul>			

**Assessor Evaluation and Conclusion (filled by auditor):**
**Auditor Verification on 29 August 2022**

The company has determined the root of the problem, corrective and corrective actions to meet the discrepancy, in addition to that, supporting evidence has also been shown, namely:

- Minutes of work accident report documents of PT Agro Sejahtera Manunggal as many as 8 people for the period January-March 2022 on 09 June 2022 to BPJS Ketenagakerjaan Ketapang.
- The company shows evidence in the form of complete documents ranging from accident investigation documents, work accident reports (KK1-KK3), employee profiles, BPJS Employment cards, trauma center examination results and other supporting documents for workers with the initials BRH.
- The company shows evidence in the form of complete documents ranging from accident investigation documents, work accident reports (KK1-KK3), employee profiles, BPJS Employment cards, trauma center examination results and other supporting documents for workers with the initials HRW.
- For workers who died as a result of the accident (BRH) the company has shown evidence of a collective agreement between the company and the heirs, details of severance pay to the heirs, proof of transfer of severance pay to the heirs and other supporting documents.
- The company shows the Decree No. 001/SK-RH/ASM-MSRR/VII/2022 dated July 1, 2022 regarding Personal In Charge (Bonardo Napitu) appointed as the officer responsible for registering, monitoring and also managing BPJS claims belonging to PT Agro Sejahtera Manunggal.
- BPJS Health and Employment documents for PT Karya Ragam Indo Agung for three workers who work in the operational environment of PT Agro Sejahtera Manunggal as construction workers.
- BPJS Health and Employment documents for FFB Transporter (Mr. Eko) for two workers who work in the operational environment of PT Agro Sejahtera Manunggal as drivers.
- BPJS Health and Employment documents for FFB Transporter (Mr. Riyanto) for one worker who works in the operational environment of PT Agro Sejahtera Manunggal as a driver.
- BPJS Health and Employment CV Kawira Putra documents for two workers who work in the operational environment of PT Agro Sejahtera Manunggal as drivers.
- BPJS Health and Employment documents for PT Surya Adi Jaya Kapuas for one worker who works in the operational environment of PT Agro Sejahtera Manunggal as a construction worker.
- Minutes of evaluator training – Evaluation of contractors at PT Agro Sejahtera Manunggal on July 8, 2022, which was attended by 15 participants.
- FFB transportation contractor evaluation form (Riyanto) on July 9, 2022 with the result that the contractor got a score of 82 with a rating point consisting of 6 points, namely willingness to have operational access along with information for audit purposes by the certification body, safety and product preservation during shipping, condition of roadworthy vehicles and their regulations, employment and compliance with OHS+Environment.
- FFB transportation contractor evaluation form (Eko) on 09 July 2022 with the result that the contractor got a score of 90 with a rating point consisting of 6 points, namely willingness to have operational access along with information for audit purposes by certification bodies, product safety and preservation during shipping, condition of roadworthy vehicles and their regulations, employment and compliance with OHS+Environment.
- A building contractor evaluation form (PT Karya Ragam Indo Agung) on July 9, 2022 with the result that the contractor got a score of 88 with a rating point consisting of 6 points, namely willingness to have operational access along with information for audit purposes by certification, security and preservation bodies product during delivery, roadworthy condition of the vehicle and its regulations, employment and compliance with OHS+Environment.
- CPO transportation contractor evaluation form (CV Kawira Putra) on July 09, 2022 with the result that the contractor got a score of 90 with a rating point consisting of 6 points, namely willingness to have operational access along with information for audit purposes by certification bodies, safety and product preservation during delivery, roadworthy condition of the vehicle along with its rules, employment and compliance with OHS+Environment.
- PK transportation contractor evaluation form (PT Surya Adi Jaya Kapuas) on July 09, 2022 with the result that the contractor got a score of 96 with scoring points consisting of 6 points, namely willingness to access operations along with information for audit purposes by certification bodies, security and product preservation during delivery, roadworthy vehicle condition and its regulations, employment and compliance with OHS+Environment.



Based on the evidence of improvement above, there are still several things that need to be pointed out, namely:

- Evidence of monitoring through the internal audit mechanism and evaluation through management review meetings will be carried out.
- Please show the list of workers who work for each third party (contractors and transporters) to ensure that all workers have been registered with BPJS.
- Procedures for evaluating contractors. If so, please indicate, and if you don't have one, could this be one of the root causes of this discrepancy. Please explain.
- Please also show proof of compliance other than BPJS which is used as the basis for the company's assessment of the contractor.
- In corrective action, it is only shown for proof of BPJS compliance, while the language of non-compliance is evidence of the overall evaluation. Please pay attention again.

Based on the evidence of improvement and explanation above, it is stated that this discrepancy has not been fulfilled.

#### **Auditor Verification on 4 March 2023**

- The company has carried out an internal audit for PT ASM and PT GHL on 15 – 26 January 2023. Based on the internal audit, there were 6 non-conformances that had been corrected and the company also showed evidence of the improvements.
- Based on the stakeholder list document for the period 2022-2023 (the past 12 months to date), the company has a partnership with a CPO contractor (CV Kawira Putra) and a PK contractor (PT Suri Adidaya Kapuas). Each of these contractors has shown a list of workers working at PT ASM and PT GHL, where there are 2 contractor workers for CV Kawira Putra and 4 contractor workers for PT Suri Adidaya Kapuas. All of these workers have participated in the BPJS program, namely *KIS* (a program for the underprivileged) whose payments are borne by the government.
- The company shows contractor procedure No. SUST-SOP-038 dated 1 July 2022, where this procedure regulates the selection and evaluation of contractors working with the company.
- The company has also shown the contractor work evaluation form documents for the 2023 period, for example, the work evaluation of the CPO transportation contractor on February 23, 2023. The following criteria are assessed in the contractor work evaluation:
  - Willingness to access operational and information for audit purposes by CB
  - Product safety and preservation during product delivery from the factory to the buyer is well maintained
  - The condition of the vehicle is roadworthy and rules for driving in the factory environment
  - Employment = Age of worker, wages, health insurance and social insurance.
  - Fulfillment of K3L requirements = PPE and fulfillment of the company's general OHS regulations
  - Positive response.

The evaluation results show that the contractor gets a score of 90 in a good category so that it is recommended to be used again in the next period. As a form of implementation, the company has shown some evidence of compliance carried out by contractors, for example the wages of contractor workers for the December 2022 period which have been adjusted to the applicable minimum wages, social insurance participation and others.

- Based on interviews with representatives of CPO and PK contractors, information was obtained that the contractor has employees who are in charge of operations to ensure that workers comply with applicable regulations such as proper vehicle conditions, have a driver's license, use PPE and so on.

Based on root cause analysis, corrections, corrective actions, interviews with contractor representatives and evidence of improvement shown by the company, it can be concluded that non-conformities have been fulfilled

<b>Verified by</b>	<b>Rindu Galih Rezza Rachmansyah/Firda Tarunajaya</b>
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<b>NCR No.</b>	<b>: 2022.03</b>	<b>Issued by</b>	<b>: Rahmat Abdiansyah</b>
<b>Date Issued</b>	<b>: 10 June 2022</b>	<b>Time Limit</b>	<b>: 08 September 2022</b>
<b>NC Grade</b>	<b>: Minor</b>	<b>Date of Closing</b>	<b>: 22 August 2022</b>

<b>Standard Ref. &amp; Requirement</b>	<b>3.2.2</b> <b>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.</b>
<b>Evidence observed (filled by auditor):</b>	
<ul style="list-style-type: none"> <li>The PT ASM RSPO Metric Template document obtained the following information:               <ol style="list-style-type: none"> <li>Demographic data for PRYM, PRYE, BRYE, and BLRE units show that the company has Nonlocal workers. but based on the results of the document review there are no NonLocal workers in PT ASM (Migrant Workers and Transmigrant Workers)</li> <li>Demographic data of Farmer Supply Base, it is known that there are only 660 farmers consisting of 480 men and 180 women (Agro Seriam Mandiri Cooperative). However, based on the results of document verification, it is known that the company also has a supply base from the Maju Sejahtera and Outgrower Farmers' Group.</li> <li>The training data and the number of registered workers for PRYM, PRYE, BRYE, and BLRE units have not been proven.</li> <li>Complaint data for the PRYM unit is known as many as 4 Complaints that have been resolved in 2021 but the evidence has not been shown yet.</li> </ol> </li> <li>Based on the Guidance For the 2018 RSPO Principles and Criteria Metric Template it is explained that "The Metric Template needs to be filled out by the Certification Unit before carrying out RSPO certification, Recertification, and annual supervisory audits". However, the company did not provide a metric template document before the audit activity was carried out.</li> </ul>	
<b>Non-Conformance Description (filled by auditor):</b>	
<p>The company has not been able to show evidence that the RSPO Metric Template documents owned are in accordance with actual conditions in the field.</p>	
<b>Root Cause Analysis (filled by organization audited):</b>	
<p>Lack of knowledge unit manager and PIC sustainability unit related to the mechanism for submitting metric template data so that data cannot be shown according to the mechanism.</p>	
<b>Correction (filled by organization audited):</b>	
<ol style="list-style-type: none"> <li>Socialization of data requirements and metric template mechanisms</li> <li>Fill in the metric template data according to the mechanism</li> <li>Submission of supporting data related to training and complaints from the unit</li> </ol>	
<b>Corrective Action (filled by organization audited):</b>	
<p>Monitoring is carried out through the internal audit mechanism and evaluation is carried out in management review meetings</p>	
<b>Assessor Evaluation and Conclusion (filled by auditor):</b>	
<b>Auditor Verification on 22 August 2022</b>	
<p>The company has presented the results of the identification and analysis of root causes and corrective actions for non-conformities that occur. Then, the company sends proof of repairs in the form of:</p> <ul style="list-style-type: none"> <li>Supporting data for filling out metric templates such as reports on trainings conducted in the certification unit, reports on socialization of various activities and policies in the certification unit.</li> <li>PRYM employee complaint book and the company's response to these complaints.</li> <li>Data on names of land plot owners for Maju Sejahtera Sawit Farmers Group with a total of 81 males and 5 females.</li> <li>Updated metric template file with the latest data.</li> </ul> <p>Based on the identification of the root cause analysis and corrective actions described as well as the evidence shown, the discrepancy in this indicator can be declared Fulfilled and will be subject to re-observation in the next audit.</p>	

<b>Verified by</b>	<b>Rahmat Abdiansyah / Hasiholan Sihombing</b>
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NCR No.	:	2022.04	Issued by	:	Sentot Adi Subandono
Date Issued	:	10 June 2022	Time Limit	:	ASA-4
NC Grade	:	Minor	Date of Closing	:	18 August 2022
Standard Ref. & Requirement	:	6.7.2 Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.			
Evidence observed (filled by auditor)					
<ul style="list-style-type: none"><li>SOP ASM-SUST-SOP-27-R00 concerning Factory and Building Fire Management which was ratified on January 10, 2022, explains, among others, the general requirements for placing hydrants easily visible, boxes easy to open, having nozzles and hoses.</li><li>The results of observations at Mill and interviews with management representatives during observations, it is known that:<ul style="list-style-type: none"><li>The hydrant to the left of the loading ramp station only has a hydrant box and a hydrant pipe.</li><li>The hydrant behind the loading ramp station near the clarification station only has a hydrant pipe.</li><li>Hydrant area sterilizer has a box, pipe, hose, and nozzle, but the connection in the pipe is loose, and the connection in the hose is leaking.</li><li>Hydrant area engine room has box, pipe, hose, and nozzle in good condition.</li></ul></li><li>Minutes of the root cause of the audit observation results to PRYM on 09 June 2022 which explained that there was no PIC monitoring hydrant, some hydrant hoses were in poor condition, and several tools were used for simulation on 02 June 2022 which had not been returned.</li></ul>					
Non-Conformance Description (filled by auditor):					
Based on this, it is known that the company has not been able to show sufficient evidence of implementing emergency response procedures at the work site.					
Root Cause Analysis (filled by organization audited):					
There is no PIC that has been specifically appointed to monitor the hydrant box and its contents on a regular basis.					
Correction (filled by organization audited):					
<ol style="list-style-type: none"><li>Appoint a special PIC who conducts periodic inspection/monitoring every month</li><li>Identify the need for hydrant points</li><li>Complete the contents of the hydrant box</li><li>Monitoring and checking the completeness of the hydrant</li></ol>					
Corrective Action (filled by organization audited):					
Conduct regular monitoring every month by the appointed PIC (EHS Officer) to ensure the condition of the hydrant can be used in an emergency.					
Assessor Evaluation and Conclusion (filled by auditor):					
Auditor Verification August 18, 2022					
The company has formulated a root cause analysis, corrective action, and acceptable preventive action. The company also shows evidence of improvements in the form of:					

1. SK 002/SK-Mgr/PRYM/VII/2022 from the Manager of PRYM dated July 1, 2022 regarding the appointment of PIC for PRYM's emergency response facilities, such as hydrants and fire extinguishers. The PIC is in charge of monitoring, procurement processes, repairs, and procurement of emergency response and evacuation training.
2. Minutes of identification and evaluation of hydrant needs, dated June 10, 2022. Result of identification, it is necessary to add hydrants at loading ramp stations line A and C.
3. Minutes of repair of hydrant equipment, dated June 11, 2022. It is informed that the contents of the fire hose and nozzle hydrant boxes have been fulfilled in the thresher, kernel A, kernel B, engine room, sterilizer, laboratory, loading ramp A and C areas.
4. Monitoring of hydrant inspections in July 2022, with the results of 9 hydrant locations being met.

Based on the improvements and evidence shown above, the non-conformance is declared fulfilled and will be re-observed at the next audit.

**Verified by** : **Sentot Adi Subandono**

NCR No.	:	2022.05	Issued by	:	Sentot Adi Subandono
Date Issued	:	10 June 2022	Time Limit	:	08 September 2022
NC Grade	:	Major	Date of Closing	:	18 August 2022
Standard Ref. & Requirement	:	6.7.3 Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.			
Evidence observed (filled by auditor)					
<ul style="list-style-type: none"><li>SOP BGA-SOP-CCS-1106.1-R0 regarding PPE which was ratified on 27 September 2011, the section on types of PPE per type of work, including regulating the use of earmuffs at boiler and kernel stations and helmet use in warehouses.</li><li>The results of observations at the Mills and interviews with workers, it is known that 2 operators at the Boiler station wear earplugs and 1 operator at the kernel station does not use hearing protection. This is not in accordance with the type of PPE that has been arranged according to the procedure.</li><li>Then the PPE handover document was shown on April 8, 2022, it was known that the boiler and kernel area workers received PPE for ear protection in the form of earplugs which was not in accordance with the procedure.</li><li>Based on the results of a field visit at the Fuel / Solar Warehouse in Bengkuang Raya Estate, it was found that the warehouse staff did not use head protection equipment (helmets).</li></ul>					
Non-Conformance Description (filled by auditor):					
Based on this, it is known that the company has not been able to show sufficient evidence that workers use PPE in accordance with the procedures they have.					
Root Cause Analysis (filled by organization audited):					
Lack of employee knowledge, supervision and new staff regarding the standard of PPE used.					
Correction (filled by organization audited):					
<ol style="list-style-type: none"><li>Disseminate PPE standards according to SOP</li><li>Provide PPE to employees according to SOP (for ear muffs at Boiler and Kernel stations)</li><li>Monitoring and inspection to ensure the use of PPE is done properly.</li></ol>					
Corrective Action (filled by organization audited):					

Conduct periodic PPE monitoring/inspection and evaluate through OHS Committee meetings and management review meetings.

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

The company has identified the root cause analysis, corrective actions, and preventive actions that have been accepted. The company also shows evidence of improvement, as follows:

1. Minutes of socialization on the use of PPE, potential hazards in the work area, and sanctions to the BHS (Bumitama Harvesting System), BGS (Bumitama Ground System), BMS (Bumitama Manuring System), Maintenance, Office, and BLRE Warehouse teams on July 13, 2022.
2. Socialization report on the use of PPE, potential hazards in the work area, and sanctions to the BHS, BGS, BMS, Maintenance, Office, and Warehouse teams at BRYE on 11 May 2022.
3. Minutes of socialization of PPE standards, mandatory use of PPE in the work area, monitoring of use, and sanctions to PRYM workers on 09 June 2022.
4. Minutes of simulation of completeness of PPE, mandatory use of PPE, and sanctions to PRYE workers, April 14, 2022.
5. Minutes of handover of PPE earmuffs to PRYM Boiler, Press, and Kernel Operators on 07 July 2022.
6. Checklist for monitoring the discipline of using PPE at BRYE on 21 – 23 June 2022, including harvesters, maintenance, foreman, and warehouse officers with the conclusion that all workers have worn PPE, boots and safety helmets.
7. Daily checklist for the use of PPE according to the standards of each work area at PRYM for all workers.
8. Minutes of inspection of the use of PPE for BRYE warehouse officers on July 12, 2022, with the conclusion that warehouse officers have used the appropriate PPE.
9. Minutes of inspection of the use of PPE in the BGS, BHS, and BMS BLRE Teams dated July 18, 2022, with the results that all inspected workers have used the appropriate PPE standards.
10. Minutes of inspection of the use of PPE in the BHS, BGS, and BMS PRYE Teams in July 2022, with the results that all inspected workers have used the appropriate PPE standards.

The company has identified root cause analysis, corrective action, preventive action, and acceptable evidence of improvement. Based on this, the discrepancy is declared to have been met and will be re-observed at the next audit.

**Verified by** : **Sentot Adi Subandono**

NCR No.	: 2022.06	Issued by	: Rindu Galih Rezza Rachmansyah
Date Issued	: 10 June 2022	Time Limit	: 08 September 2022
NC Grade	: Minor raised to Major	Date of Closing	: 05 September 2022
Standard Ref. & Requirement	6.7.4 All workers are provided with health care and covered by accident insurance. Costs incurred as a result of work-related incidents, resulting in injury or illness, are borne in accordance with national law or by the unit of certification if national law does not provide protection.		
Evidence observed (filled by auditor):			
<ul style="list-style-type: none"><li>• The company currently has registered and recorded all of its workers in the BPJS (Health and Employment) program which can be shown by other supporting documents such as proof of payment and data collection of workers registered in the BPJS program. The last payment for BPJS Health was made on May 9, 2022, while for BPJS for Employment on May 13, 2022.</li><li>• Based on the results of interviews with contractors and transporters, it is known that the workers have been registered in the BPJS Health and Employment programs, but this has not been shown to the team of auditors. In addition, from the results of the review of contractor evaluation documents where in the evaluation results for the fulfillment of BPJS registration there are 2 transporters who have received full marks, but the evidence cannot be shown by the company.</li><li>• In the Audit document List of Legal Provisions and Manpower Regulations No. 04/ASM/SUST-LR/XI/2020 Revision 02 dated 01 April 2022 which was approved by the Regional Head (RH). The document states that it has complied with Government Regulation no. 14 of 1993 juncto no. 84 of 2013 concerning the Implementation of <i>Jamsostek</i> article 9 paragraph 2 which states that the Employment Accident Insurance Contribution, Death Benefit and Health Care Insurance are fully borne by the</li></ul>			



entrepreneur.

- Based on the results of interviews with the process operator, it is known that in July 2020 there was a work accident at the sterilizer station which caused 1 worker to die and 1 worker to be permanently disabled. In addition, the LTA (Lost Time Accident) document of PT Agro Sejahtera Manunggal is known in the January-April 2022 period there were 8 work accidents that caused 26 days lost. However, from the two information, the company has not been able to show evidence of reporting work accidents and claims to BPJS Employment in accordance with applicable regulations (Government Regulation No. 13 of 1993).

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

The company has not been able to show evidence that all workers including workers from third parties/contractors have been registered in the BPJS (Health and Employment) program and its implementation is in accordance with applicable laws and regulations, from reporting work accidents to claims.

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

- Lack of knowledge from the PIC unit that evaluates contractors and understanding when the assessment must be based on the evidence shown
- There is no PIC appointed for the management of BPJS Employment to replace the Resigned HR Officer
- Does not yet have a mechanism / SOP for contractor evaluation for PT ASM

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

- Conduct training for PICs who evaluate contractors/evaluators
- Appoint a PIC for the management of BPJS Employment
- Attaching BPJS Employment and Health/KIS data that has not been shown / as an attachment to the basic contractor evaluation
- Reporting incident by the appointed PIC
- Coordination with the PIC related to the July 2020 incident with the HRD PT GKG (BGA Region Office)
- Making contractor evaluations

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

- Monitoring is carried out through RSPO internal audit activities and will be reviewed periodically through Management Review Meetings
- Making SOPs for contractor evaluation for PT ASM

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

**Auditor Verification on 29 August 2022**

The company has determined the root of the problem, corrective and corrective actions to meet the discrepancy, in addition to that, supporting evidence has also been shown, namely:

- Minutes of work accident report documents of PT Agro Sejahtera Manunggal as many as 8 people for the period January-March 2022 on 09 June 2022 to BPJS Ketanagakerjaan Ketapang.
- The company shows evidence in the form of complete documents ranging from accident investigation documents, work accident reports (KK1-KK3), employee profiles, BPJS Employment cards, trauma center examination results and other supporting documents for workers with the initials BRH.
- The company shows evidence in the form of complete documents ranging from accident investigation documents, work accident reports (KK1-KK3), employee profiles, BPJS Employment cards, trauma center examination results and other supporting documents for workers with the initials HRW.
- For workers who died as a result of the accident (BRH) the company has shown evidence of a collective agreement between the company and the heirs, details of severance pay to the heirs, proof of transfer of severance pay to the heirs and other supporting documents.
- The company shows the Decree No. 001/SK-RH/ASM-MSRR/VII/2022 dated July 1, 2022 regarding Personal In Charge (Bonardo Napitu) appointed as the officer responsible for registering, monitoring and also managing BPJS claims belonging to PT Agro Sejahtera Manunggal.
- BPJS Health and Employment documents for PT Karya Ragam Indo Agung for three workers who work in the operational environment of PT Agro Sejahtera Manunggal as construction workers.

- BPJS Health and Employment documents for FFB Transporter (Saudara Eko) for two workers who work in the operational environment of PT Agro Sejahtera Manunggal as drivers.
- BPJS Health and Employment documents for FFB Transporter (Brother Riyanto) for one worker who works in the operational environment of PT Agro Sejahtera Manunggal as a driver.
- BPJS Health and Employment CV Kawira Putra documents for two workers who work in the operational environment of PT Agro Sejahtera Manunggal as drivers.
- BPJS Health and Employment documents for PT Surya Adi Jaya Kapuas for one worker who works in the operational environment of PT Agro Sejahtera Manunggal as a construction worker.
- Minutes of evaluator training – Evaluation of contractors at PT Agro Sejahtera Manunggal on July 8, 2022, which was attended by 15 participants.

Based on the evidence of improvement above, there are still several things that need to be pointed out, namely:

- Evidence of monitoring through the internal audit mechanism and evaluation through management review meetings will be carried out.
- Please show the list of workers who work for each third party (contractors and transporters) to ensure that all workers have been registered with BPJS.
- Procedures for evaluating contractors. If so, please indicate, and if you don't have one, could this be one of the root causes of this discrepancy. Please explain.
- Please also show proof of compliance other than BPJS which is used as the basis for the company's assessment of the contractor.
- In corrective action, it is only shown for proof of BPJS compliance, while the language of non-compliance is evidence of the overall evaluation. Please pay attention again.

Based on the evidence of improvement and explanation above, it is stated that this discrepancy has not been fulfilled.

#### **Auditor Verification on 05 September 2022**

The company can show some additional evidence as follows:

- PT Karya Ragam Indo Agung labor list document for three workers who work in the operational environment of PT Agro Sejahtera Manunggal as construction workers.
- FFB Transporter (Mr. Eko) labor list document for two workers who work in the operational environment of PT Agro Sejahtera Manunggal as drivers.
- FFB Transporter (Mr. Riyanto) labor list document for one worker who works in the operational environment of PT Agro Sejahtera Manunggal as a driver.
- CV Kawira Putra labor list document for two workers who work in the operational environment of PT Agro Sejahtera Manunggal as drivers.
- PT Surya Adi Jaya Kapuas labor list document for one worker who works in the operational environment of PT Agro Sejahtera Manunggal as a construction worker.
- Communication document with BPJS PIC at the PT GKG Regional BGA Representative Office related to updating the management of work accident reports and claims via WhatsApp (this is done to facilitate management at the district office because PT ASM is quite far away). The last communication was on August 16, 2022 regarding the progress of payment of work accident claims.
- PT Agro Sejahtera Manunggal Sustainability Program document in 2022, in which monitoring related to the application of RSPO internal audit activities and will be reviewed periodically through Management Review Meetings has been included in it.
- Contractor Procedure No. SUST-SOP-038 dated July 1, 2022, where this procedure regulates the selection and evaluation of contractors in collaboration with the company.

Based on the explanation above, the discrepancy in this indicator is declared to have been fulfilled.

**Verified by**

**Rindu Galih Rezza Rachmansyah**

<b>NCR No.</b>	<b>:</b>	<b>2022.07</b>	<b>Issued by</b>	<b>:</b>	<b>Rahmat Abdiansyah</b>
<b>Date Issued</b>	<b>:</b>	<b>10 June 2022</b>	<b>Time Limit</b>	<b>:</b>	<b>ASA-4</b>
<b>NC Grade</b>	<b>:</b>	<b>Minor</b>	<b>Date of Closing</b>	<b>:</b>	<b>25 August 2022</b>
<b>Standard Ref. &amp; Requirement</b>	<b>:</b>	<b>7.3.1</b> <b>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</b>			
<b>Evidence observed (filled by auditor):</b>  <b>Limbah Domestik</b> <ul style="list-style-type: none"> <li>SOP for Waste Management for Office Housing with Number ASM-SUST-SOP-33 which explains that all employees and workers in housing, offices and other work facilities are required to dispose of waste in the trash cans provided.</li> <li>The results of field observations at the Pembangunan Raya Estate Employee Housing found that there were several piles of garbage behind the employee housing that were not disposed of in the trash cans provided.</li> <li>The results of field observations at the Bengkuang Raya Estate Employee Housing found that there was a pile of garbage behind the employee housing that was not disposed of in the trash can provided.</li> <li>The results of field observations at the Belaban Estate Employee Housing found that there was a pile of garbage behind the employee housing that was not disposed of in the trash can provided.</li> </ul> <b>Non-Conformance Description (filled by auditor):</b>  Based on the evidence above, the Company has not been able to show evidence that the Domestic Waste Management is in accordance with its SOP.					
<b>Root Cause Analysis (filled by organization audited):</b> The inconsistency of clean Friday activities and routine waste transportation is due to the absence of a PIC specifically appointed to carry out monitoring.					
<b>Correction (filled by organization audited):</b> <ul style="list-style-type: none"> <li>Appoint a Head of Section (Head of Administration Section) of each unit as PIC to monitor clean Friday activities and waste management</li> <li>Preparation of the Clean Friday Program for all units and the Schedule of Garbage Transport</li> <li>Consistent clean Friday activities in all units</li> <li>IOM RH on Waste Management and the Prohibition of Burning Garbage</li> <li>Minutes of the Clean Friday Socialization and IOM RH related to the ban on burning garbage</li> </ul>					
<b>Corrective Action (filled by organization audited):</b> Monitoring is carried out by the Head of the Unit for clean Friday activities and waste management for each unit and will be evaluated in the management review meeting.					
<b>Assessor Evaluation and Conclusion (filled by auditor):</b> <b>Auditor Verification August 25, 2022</b> The company has sent proofs of repairs in the form of: <ul style="list-style-type: none"> <li>Internal Office Memo Number 025/AC-7A/VII/2022 from Area Controller 7A on July 1, 2022 which explains the Appointment of Personal In Charge Monitoring on Clean Friday which explains that the Head of Section in each unit is the PIC who acts as a companion and monitors the progress of activities clean Fridays and garbage collection and ensure that there is no burning of garbage in the emplacement which is carried out every week.</li> </ul>					

- Internal Office Memo Number 001/IOM/AC-ASM/2022 dated July 4, 2022 regarding PT Agro Sejahtera Manunggal Housing Regulations from Area Controller 7A which explains regulations in employee housing starting from the Cleanliness, Beauty & Health, Order and Courtesy Regulations Occupants, and Security.
- PT Agro Sejahtera Manunggal's Clean Friday and Garbage Collecting Program which is set on July 1, 2022. The schedule for Clean Friday is carried out every week. The schedule is for all units, both Estate and Mill.
- Minutes of IOM's Socialization and Clean Friday Program to All Employees, both Estate and Mill, which was held on July 1, 2022.
- Realization of Clean Friday Activities The management of PT Agro Sejahtera Manunggal's healthy environment which was carried out at the Estate and Mill Housing on August 1, 2022. Also attached are documentation in the form of Photos and Reports of Clean Friday activities.
- Root Cause Analysis, Correction, and Corrective Action.

Based on the evidence of improvement sent by the company, the discrepancy in this indicator is declared Fulfilled.

<b>Verified by</b>	<b>Rahmat Abdiansyah</b>
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NCR No.	:	2022.08	Issued by	:	Rahmat Abdiansyah
Date Issued	:	10 June 2022	Time Limit	:	Next Surveillance
NC Grade	:	Minor	Date of Closing	:	27 August 2022
Standard Ref. & Requirement	:	7.3.3 The unit of certification does not use open fire for waste disposal.			
Evidence observed (filled by auditor):					
<ul style="list-style-type: none"><li>Office Residential Waste Management SOP Number ASM-SUST-SOP-33 which explains that every household head must control the waste produced by his household and it is strictly forbidden to destroy waste by burning it.</li><li>The results of field observations in the housing area of Pembangunan Raya Estate employees revealed that there were 4 points of burning domestic waste.</li><li>The results of field observations in the housing area of Pembangunan Raya Mill employees revealed that there was 1 point of burning domestic waste.</li></ul>					
Non-Conformance Description (filled by auditor):					
Based on the above evidence, the Company has not been able to show evidence that it does not use open burning for waste disposal.					
Root Cause Analysis (filled by organization audited):					
<ul style="list-style-type: none"><li>Lack of employee knowledge related to the prohibition of burning waste, especially for new employees.</li><li>The inconsistency of clean Friday activities and routine waste transportation is due to the absence of a PIC specifically appointed to carry out monitoring.</li></ul>					
Correction (filled by organization audited):					
<ul style="list-style-type: none"><li>Appoint the Head of Section (Head of Administration Section) of each unit as PIC to monitor clean Friday activities and to ensure that there is no waste burning.</li><li>Preparation of the Clean Friday Program for all units and the Schedule of Garbage Transport</li><li>Consistent clean Friday activities in all units</li><li>IOM RH on Waste Management and the Prohibition of Burning Garbage</li><li>Minutes of the Clean Friday Socialization and IOM RH related to the ban on burning garbage</li></ul>					

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

Monitoring is carried out by the Head of the Unit for clean Friday activities and waste management for each unit and will be evaluated in the management review meeting

**Assessor Evaluation and Conclusion (filled by auditor):**
**Auditor Verification on August 25, 2022**

The company has sent proofs of repairs in the form of:

- Internal Office Memo Number 025/AC-7A/VII/2022 from Area Controller 7A on July 1, 2022 which explains the Appointment of Personal In Charge Monitoring on Clean Friday which explains that the Head of Section in each unit is the PIC who acts as a companion and monitors the progress of activities clean Friday and garbage collection and ensure that there is no burning of garbage in the Emplacement which is carried out every week.
- Internal Office Memo Number 001/IOM/AC-ASM/2022 dated July 4, 2022 regarding PT Agro Sejahtera Manunggal Housing Regulations from Area Controller 7A which explains regulations in employee housing starting from the Cleanliness, Beauty & Health, Order and Courtesy Regulations Occupants, and Security.
- PT Agro Sejahtera Manunggal's Clean Friday and Garbage Collecting Program which is set on July 1, 2022. The schedule for Clean Friday is carried out every week. The schedule is for all units, both Estate and Mill.
- Minutes of IOM's Socialization and Clean Friday Program to All Employees, both Estate and Mill, which was held on July 1, 2022.
- Realization of Clean Friday Activities The management of PT Agro Sejahtera Manunggal's healthy environment which was carried out at the Estate and Mill Housing on August 1, 2022. Also attached are documentation in the form of Photos and Reports of Clean Friday activities.
- Root Cause Analysis, Correction, and Corrective Action. However, there are still some questions from the auditor on root cause analysis, correction, and corrective actions that must be explained by the company.

Based on the evidence of improvement sent by the company, the non-conformance in this indicator is declared Unfulfilled.

**Auditor Verification Date 27 August 2022**

The Company has sent evidence of improvement in the form of root cause analysis, Correction, and Correction Action in accordance with the Auditor's comments. The implementation of Correction and Corrective Action has been explained in the verification of the previous proof of improvement.

Based on the evidence sent by the company, the discrepancy in this indicator is declared Fulfilled and will be re-observed at the next assessment.

**Verified by**
**Rahmat Abdiansyah**

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

NCR No.	: 2023.01	Issued by	: Erika Lucitawati
Date Issued	: 04 March 2023	Time Limit	: RC
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.		
<b>Evidence observed (filled by auditor):</b> Based on result of interviews with management representative, PT Gunajaya Harapan Lestari does not yet have a licensed hazardous and toxic waste storage area. The results of the field visit showed that PT Gunajaya Harapan Lestari already has a hazardous and toxic waste storage building located in the Teluk Rengit Estate. PT Gunajaya Harapan Lestari has attached document Letter No. 001/D&L-GHL-Dir.KSS/II/2023 dated 4 February 2023 regarding Application for Integration of PT Gunajaya Harapan Lestari's Technical Details of hazardous and toxic waste into the Environmental Agreement from PT Gunajaya Harapan Lestari to the Public Housing, Settlements and Environment Agency of Ketapang Regency.			
<b>Non-Conformance Description (filled by auditor):</b> PT Gunajaya Harapan Lestari has not been able to show evidence that it has a permit document for Temporary Storage of Hazardous and Toxic Waste issued by relevant agency.			
<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>Follow up on next audit (filled by auditor):</b>			
Verified by	:		

NCR No.	: 2023.02	Issued by	: Erika Lucitawati
Date Issued	: 04 March 2023	Time Limit	: 02 June 2023
NC Grade	: Major	Date of Closing	: 02 June 2023



<b>Standard Ref. &amp; Requirement</b>	<b>7.8.2</b> <b>Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</b>
<b>Evidence observed (filled by auditor):</b>	<p>Based on the results of the document review, PT Gunajaya Harapan Lestari conducted an HCV study in 2012 and determined the HCV area within PT Gunajaya Harapan Lestari's HGU area based on Internal Office Memo No. 013/IOM-7A/SUST/01/2023 dated 13 January 2023 stipulated by Area Controller 7A regarding the determination of PT Gunajaya Harapan Lestari's HCV Area. Based on the document, it was obtained that the HCV area was 115.01 ha which was the HCV area within PT Gunajaya Harapan Lestari's HGU, including Kelik River riparian area of 13.69 ha, Perepat Tunggal River riparian of 4.99 ha, and Malang Pinggan River riparian of 8.16 ha which is included in HCV 1.1, HCV 1.2, HCV 4.1. In addition, recommendations for management and monitoring based on the document include the establishment of HCVs and their supporting buffers, installation of boundary markers, installation of information boards (nameplates, boards prohibiting burning, encroaching on or destroying HCV areas), outreach and supervision and imposition of sanctions for violators.</p> <p>Based on the results of a field visit to the HCV area in Teluk Rengit Estate at PT Gunajaya Harapan Lestari, the following is known:</p> <ul style="list-style-type: none"> <li>• Spray marks on the border of the Malang Pinggan River riparian Block B26.</li> <li>• There is no limit to the application of chemicals (such as fertilizers and pesticides) on the Malang Pinggan River riparian Block B26, Kelik River riparian Block B16, and Perepat Tunggal River riparian Block C03.</li> <li>• There are no HCV warning boards on the Malang Pinggan River riparian Block B26 and Perepat Tunggal River riparian Block C03.</li> <li>• There are oil palm plants that have already been planted. Based on the Teluk Rengit Estate Planting Year Map, oil palm on the banks of the Malang Pinggan River was planted in 2012, on the banks of the Kelik River in 2012, and on the banks of the Perepat Tunggal River in 2013.</li> </ul> <p>PT Gunajaya Harapan Lestari has shown the following documents:</p> <ul style="list-style-type: none"> <li>• PT Gunajaya Harapan Lestari High Conservation Value (HCV) Report Semester I-II 2022 which includes 3 units of setting up boundary markings on the Kelik River riparian, 3 units on the Belian River riparian, 5 units of coastal &amp; mangrove ecosystem buffers and 5 units of long hills on Semester I 2022. Meanwhile, the installation of boundary signs in Semester II 2022 will be carried out on the hills of Teluk Pumpun and <i>Rawa Merah</i> for 5 units each.</li> <li>• PT Gunajaya Harapan Lestari High Conservation Value Management Activity Plan for 2022 and 2023 with activities in the form of installing boundary markers, installing signboards/warning boards, rehabilitation and enrichment, outreach to the community and employees, as well as patrolling the maintenance of boundary markers and nameplates and prohibitions .</li> <li>• Minutes of the Rehabilitation Plan which were set on March 3, 2023 and approved by the Estate Manager of Teluk Rengit Estate at PT Gunajaya Harapan Lestari. The rehabilitation plan includes area determination, seed preparation, land preparation, planting and maintenance carried out on the banks of the Belian River, Kelik River, Malang Pinggan River, Grandma Unah River, Perepat Tunggal River, Teluk Dalam River, Teluk Pupun River, Tg Rotan River, and Toip River.</li> </ul> <p>Based on the RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or the Simplified Guide Management and Rehabilitation of Riparian Reserves (2018), it is known:</p> <ul style="list-style-type: none"> <li>• The recommended width for river basin buffers is 10-20 m wide i.e., 20 m on both banks of the river.</li> <li>• Threats must be identified and managed on a case-by-case basis including human encroachment (including illegal logging, clearing of lagoons, etc.), fire prevention, wildlife protection, and soil and riverbank erosion (there are regular plantation activities).</li> </ul> <p><b>Non-Conformance Description (filled by auditor):</b>  PT Gunajaya Harapan Lestari has not shown evidence that it has protected water flows in accordance with the 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or the Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p> <p><b>Root Cause Analysis (filled by organization audited):</b></p>

There is officer for monitoring the program and the condition of the HCV area including the watershed area at PT GHL.

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

- Appoint an HCV officer to monitor the program and the condition of the HCV area including the watershed area
- Create an HCV area management program including patrol monitoring of HCV areas
- Repairs by installing signboards, markers according to the RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018) HCV and outreach to the community and related employees (officers) fertilizer and spray). Improvements to the installation of signboards and HCV markers as boundary markers for agrochemical applications (inorganic fertilizers and pesticides) were carried out at the Malang Waist River Block B26, Kelik River Block B16, and Perepat Tunggal River Block C03 as well as at other HCV locations identified by signboards and the HCV marker is missing/not there yet
- Conduct routine patrols and monitor the condition of the HCV area. Patrols and monitoring are carried out thoroughly throughout the HCV area including areas that are found such as the Malang Waist River border Block B26, the Kelik River border Block B16, and the Perepat Tunggal River border Block C03

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

- Performing evaluation and monitoring through internal audits and management review meetings
- Appointing a special officer in charge of monitoring and monitoring the HCV area. In addition, an evaluation of the results of repairs and monitoring of HCV was carried out with the area management.

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

**Auditor Verification (24 May 2023)**

The company has determined the root cause analysis, correction, and corrective action. The company has also shown the following documents:

- Determination of root cause analysis, correction, and corrective action. However, there are still auditor responses that need to be answered by the company in the correction and corrective action column.
- The 2023 Minutes of Installation of HCV Signboards, HCV Stakes and Tree Planting of TRNE Year 2023 which was prepared on March 31, 2023. However, the document only contains pictures without other information (such as the installation location of HCV signboards and HCV stakes, location and type of trees planted, distance of installation signboards, etc.)
- Minutes of HCV Outreach to TRNE employees on 16 February 2023 which was attended by 38 participants.
- Minutes of HCV outreach to the people of Pulau Bawal on 16 February 2023 which was attended by 10 participants.
- Decree dated March 13, 2023 which was ratified by the Estate Manager of PT GHL regarding the appointment and appointment of an HCV officer at PT GHL, namely the Sustainability Foreman. Job descriptions in the form of identifying and inventorying the needs of plants to be planted, designing and building plant nurseries on riverbanks, scheduling and carrying out planting of plants in buffer zones, identifying needs for HCV signboards, monitoring the presence of flora/fauna, socializing HCV, and preparing periodic reports.
- PT GHL's KBKT Management Activity Plan for 2023.
- Patrol Report on monitoring biodiversity and environmental services as well as signboards carried out on April 24, 2023 by the Sustainability Foreman at the Bukit Panjang, Teluk Dalam, Sungai Kelik, and Swamp C31 locations.

Based on the explanation above, this nonconformity is declared not fulfilled.

**Auditor Verification (31 May 2023)**

The company has determined the root cause analysis, correction and corrective action along with evidence of improvement in the form of the following documents:

- Decree of Appointment and Appointment of PT GHL's HCV Officer dated 13 March 2023 by the TRNE Estate Manager. The designated HCV officer is the Sustainability Foreman at TRNE.
- Minutes of TRNE's HCV Evaluation and Monitoring made on 27 April 2023 by the Head Assistant for Sustainability. The evaluation included the installation of HCV signboards for the installation of HCV stakes/markings such as those on the Malang Waist River Block B26, the Kelik River Block B16, and the Perepat Tunggal River Block C03.

Based on the explanation above, the nonconformity in this indicator is stated to have been fulfilled.

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

**Verified by** : **Erika Lucitawati**

NCR No.	: 2023.03	Issued by	: Erika Lucitawati
Date Issued	: 04 March 2023	Time Limit	: 02 June 2023
NC Grade	: Major	Date of Closing	: 02 June 2023
Standard Ref. & Requirement	: 7.12.4 Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).		

**Evidence observed** (filled by auditor):

Based on the results of the document review, the company conducted an HCV study in 2012 and determined the HCV area within PT GHL's HGU area based on Internal Office Memo No. 013/IOM-7A/SUST/01/2023 dated 13 January 2023 stipulated by Area Controller 7A regarding the determination of PT GHL's HCV Area. Based on the document, it was obtained that the HCV area was 116.01 ha which was the HCV area within PT GHL's HGU, including the Kelik River riparian area of 13.69 ha, the Perepat Tunggal River border of 4.99 ha, and the Malang Pinggan River border of 8.16 ha which is included in HCV 1.1, HCV 1.2, HCV 4.1. In addition, recommendations for management and monitoring based on the document include establishing HCVs and their supporting buffers, installing boundary markers, installing information boards (nameplates, signs prohibiting burning, encroaching on or destroying HCV areas), outreach and monitoring and imposing sanctions on violators.

Based on the results of a field visit to the HCV area in Teluk Rengit Estate at PT Gunajaya Harapan Lestari, the following is known:

- Spray marks on the border of the Malang Pinggan River Block B26.
- There is no limit to the application of chemicals (such as fertilizers and pesticides) on the Malang Waist River Block B26, the Kelik River Block B16, and the Perepat Tunggal River Block C03.
- There are no HCV warning boards on the Malang Waist River Block B26 and the Perepat Tunggal River border Block C03.
- There are oil palm plants that have already been planted. Based on the TRNE Planting Year Map, oil palm on the banks of the Malang Waist River was planted in 2012, on the banks of the Kelik River in 2012, and on the banks of the Perepat Tunggal River in 2013.

PT Gunajaya Harapan Lestari has shown the following documents:

- PT Gunajaya Harapan Lestari High Conservation Value (HCV) Report Semester I-II 2022 which includes 3 units of setting up boundary markings on the Kelik River riparian, 3 units on the Belian River border, 5 units of coastal & mangrove ecosystem buffers and 5 units of long hills on Semester I 2022. Meanwhile, the installation of boundary signs in Semester II 2022 will be carried out on the hills of Teluk Pumpun and Rawa Merah for 5 units each.
- PT Gunajaya Harapan Lestari KBKT Management Activity Plan for 2022 and 2023 with activities in the form of installing boundary markers, installing signboards/warning boards, rehabilitation and enrichment, outreach to the community and employees, as well as patrolling the maintenance of boundary markers and nameplates and prohibitions.
- Minutes of the Rehabilitation Plan which were set on March 3, 2023 and approved by the Estate Manager of Teluk Rengit Estate at PT Gunajaya Harapan Lestari. The rehabilitation plan includes area determination, seed preparation, land preparation, planting and maintenance carried out on the banks of the Belian River, Kelik River, Malang Pinggan River, Grandma Unah River, Perepat Tunggal River, Teluk Dalam River, Teluk Pupun River, Tg Rotan River, and Top River.

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

Unit of certification has not conducted HCV management based on a predetermined HCV management plan.

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

There is officer for monitoring the program and the condition of the HCV area including the watershed area at PT GHL.

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

- Appoint an HCV officer to monitor the program and the condition of the HCV area including the watershed area
- Create an HCV area management program including patrol monitoring of HCV areas
- Repairs by installing signboards, markers according to the RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018) HCV and outreach to the community and related employees (officers) fertilizer and spray). Improvements to the installation of signboards and HCV markers as boundary markers for agrochemical applications (inorganic fertilizers and pesticides) were carried out at the Malang Waist River Block B26, Kelik River Block B16, and Perepat Tunggal River Block C03 as well as at other HCV locations identified by signboards and the HCV marker is missing/not there yet
- Conduct routine patrols and monitor the condition of the HCV area. Patrols and monitoring are carried out thoroughly throughout the HCV area including areas that are found such as the Malang Waist River border Block B26, the Kelik River border Block B16, and the Perepat Tunggal River border Block C03

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

- Performing evaluation and monitoring through internal audits and management review meetings
- Appointing a special officer in charge of monitoring and monitoring the HCV area. In addition, an evaluation of the results of repairs and monitoring of HCV was carried out with the area management.

**Assessor Evaluation and Conclusion (filled by auditor):**
**Auditor Verification (24 May 2023)**

The company has determined the root cause analysis, correction, and corrective action. The company has also shown the following documents:

- Determination of root cause analysis, correction, and corrective action. However, there are still auditor responses that need to be answered by the company in the correction and corrective action column.
- The 2023 Minutes of Installation of HCV Signboards, HCV Stakes and Tree Planting of TRNE Year 2023 which was prepared on March 31, 2023. However, the document only contains pictures without other information (such as the installation location of HCV signboards and HCV stakes, location and type of trees planted, distance of installation signboards, etc.)
- Minutes of HCV Outreach to TRNE employees on 16 February 2023 which was attended by 38 participants.
- Minutes of HCV outreach to the people of Pulau Bawal on 16 February 2023 which was attended by 10 participants.
- Decree dated March 13, 2023 which was ratified by the Estate Manager of PT GHL regarding the appointment and appointment

of an HCV officer at PT GHL, namely the Sustainability Foreman. Job descriptions in the form of identifying and inventorying the needs of plants to be planted, designing and building plant nurseries on riverbanks, scheduling and carrying out planting of plants in buffer zones, identifying needs for HCV signboards, monitoring the presence of flora/fauna, socializing HCV, and preparing periodic reports.

- PT GHL's KBKT Management Activity Plan for 2023.
- Patrol Report on monitoring biodiversity and environmental services as well as signboards carried out on April 24, 2023 by the Sustainability Foreman at the Bukit Panjang, Teluk Dalam, Sungai Kelik, and Swamp C31 locations.

Based on the explanation above, this nonconformity is declared not fulfilled.

**Auditor Verification (31 May 2023)**

The company has determined the root cause analysis, correction and corrective action along with evidence of improvement in the form of the following documents:

- Decree of Appointment and Appointment of PT GHL's HCV Officer dated 13 March 2023 by the TRNE Estate Manager. The designated HCV officer is the Sustainability Foreman at TRNE.
- Minutes of TRNE's HCV Evaluation and Monitoring made on 27 April 2023 by the Head Assistant for Sustainability. The evaluation included the installation of HCV signboards for the installation of HCV stakes/markings such as those on the Malang Waist River Block B26, the Kelik River Block B16, and the Perepat Tunggal River Block C03.

Based on the explanation above, the nonconformity in this indicator is stated to have been fulfilled.

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

<b>Verified by</b>	:	<b>Erika Lucitawati</b>
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**3.4.3. Opportunity for Improvement**

No	Ref.Std.	Description
1	3.6.2	<p><b>The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored</b></p> <p>The company has conducted special health checks for workers with certain risks, but has not conducted periodic health checks for all workers. Company have the opportunity to carry out periodic health checks in 2023 for all workers.</p>
2	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 certification unit has also included some of its employees in the <i>BPJS Kesehatan</i> program. From the results of a review of the workforce list documents for the December 2022 period, it is known that the total number of workers from PT ASM and PT GHL is 1,771 people. Then, the unit of certification showed proof of <i>BPJS Kesehatan</i> payment for 532 workers on December 7<sup>th</sup>, 2022. Based on the results of interviews with workers in the sampling unit, for example the sterilizer operator in the PRYM unit, information was obtained that the company had included workers and their families (wives and children) in the <i>BPJS Kesehatan</i> program. This can be proven in the worker's pay slip document for December 2022 that there is a deduction for <i>BPJS Kesehatan</i>. In addition, based on the results of interviews with spray workers at the TRNE unit, information was obtained that these workers had not been registered and had not received a <i>BPJS Kesehatan</i> card.</p> <p>Based on the results of a review of workforce documents for the period December 2022 and details on the list of workers registered for the health insurance program, the following information is obtained:</p> <ul style="list-style-type: none"> <li>• <i>BPJS Kesehatan</i> Program = 532 workers</li> <li>• <i>PBI</i> health insurance program = 817 workers</li> <li>• Workers who have not been registered because their <i>NIK KTP</i> is not online = 422 workers</li> </ul> <p>Then, based on the results of interviews with management representatives, information was obtained that workers who have <i>NIK KTPs</i> that are not online cannot be registered into the <i>BPJS Kesehatan</i> program because this data cannot be input into the <i>EDABU</i> application (<i>BPJS Kesehatan</i>). So that until now the company is urging workers to renew their <i>NIK KTP</i> to the Population and Civil Registration Service (<i>DISDUKCAPIL</i>) so that they can be registered online into the <i>BPJS Kesehatan</i> program. The company also shows:</p> <ul style="list-style-type: none"> <li>• PT ASM's <i>BPJS Kesehatan</i> registration progress until February 2023 is 43%.</li> <li>• <i>BPJS Kesehatan</i> Participation Registration Program for all Employees number 005/HR-Sei-Rasau/2023 on January 27 2023 which was signed by RH Sei Rasau. The document explains that <i>BPJS Kesehatan</i> Registration for all workers at PT ASM and PT GHL will continue until November 2023 with a target of 100%. In addition, the company will also require that all workers registered with the <i>PBI</i> health insurance program will be transferred to the company's <i>BPJS Kesehatan</i> program.</li> </ul> <p>As a form of temporary health protection for workers who have not been programmed in <i>BPJS Kesehatan</i>, the company has a clinic that can be accessed by all workers and their families. All medical expenses will be borne by the company including the cost of hospitalization at the referral hospital. For example, evidence of medical treatment for a worker with the initials ATN from the PRYM unit who complains of pain in the solar</p>



		plexus.  From the description above, it can be concluded that the certification unit has the opportunity to register and distribute <i>BPJS Kesehatan</i> cards to all of its employees according to a predetermined plan.
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**3.4.4. Noteworthy Positive Components**

No	Description
1	Cooperation and information disclosure
2	Improving the welfare of the people of Pulau Bawal Sub Village of Kendawangan Kiri Village.

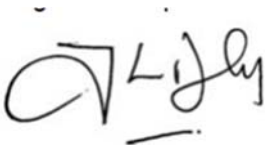

**3.5 Summary of Arising Issues from Public and Auditor Verification**

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>Gender Committee of PRYM unit (PT ASM)</b> Head of Gender Committee March 1<sup>st</sup>, 2023</p> <ul style="list-style-type: none"> <li>• Formed in 2021.</li> <li>• Have a work program for the next year, for example outreach related to health aspects and handling sexual harassment.</li> <li>• Until now, they have never received complaints related to gender.</li> <li>• There is no issue of discrimination, women can work in companies both in offices and in the field.</li> <li>• No forced labor.</li> <li>• The company allows time for female workers who breastfeed while working.</li> </ul>	<p>No negative issue need to further observation.</p>
<p><b>Gender Committee of PRYE, BRYE and BLRE units (PT ASM) and TRNE unit (PT GHL)</b> Head of Gender Committee March 1<sup>st</sup> – 3<sup>rd</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, or violation 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>The gender committee at TRNE unit (PT GHL) added information that on Wednesday, 1<sup>st</sup> March 2023 there was domestic violence committed by a worker with the initials BS against his wife with the initials LN. So that the wife suffered injuries to the head and body. The unit of certification has taken firm action on the matter.</p>	<p>The company has shown documents on the minutes of incidents of domestic violence committed by workers/perpetrators (BS) to wives/victims (LN) and children from wives (LS) on March 1<sup>st</sup>, 2023. The security commander received a report from a worker at 12.15 WIB regarding the quarrel that occurred between BS and LN. Then the security commander and his members approached BS's house and found LN crying. On LN's head there was a torn wound because he was hit with a cellphone. BS also admitted to hitting LS using a broom handle on the right and left calves and hitting the forehead and pinching LS's lips causing bruises and injuries. Then, LN and LS were brought to the clinic to receive treatment by medical personnel.</p> <p>Based on the results of interviews with representatives of the TRNE unit's gender committee, information was obtained that LN did not raise the case to the authorities (the police) and decided to make peace with BS. In addition, BS has resigned from the company on the same date as the date of the violence incident, namely March 1<sup>st</sup>, 2023. So, BS, LN and LS have also left the company area.</p> <p>The company shows:</p> <ul style="list-style-type: none"> <li>• Employee resignation letter with the initials BS on March 1<sup>st</sup>, 2023.</li> <li>• Outgoing manpower report number 248/GHL-TRNE/KTP/03/2022 on March 1<sup>st</sup>, 2023, signed by the general and personnel departments. The document explains that the worker with the initials BS has left PT GHL.</li> </ul>

Public Issues (Institution/ NGO/Community)	Auditor Verification
	Certificate of taking BPJS number 248/SKPK/E/03/2023 on March 3 <sup>rd</sup> , 2023.
<p><b>LKS Bipartite (PT ASM and PT GHL)</b> Member of LKS Bipartite March 1<sup>st</sup> – 3<sup>rd</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>	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><b>Employee Cooperative (UPS)</b> Admin of Employee Cooperative March 1<sup>st</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 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>	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><b>CPO Contractor (CV Kawira Putra)</b> Operational Head March 1<sup>st</sup>, 2023</p> <ul style="list-style-type: none"> <li>• The form of cooperation between the contractor and the company is the transportation of CPO to the factory units.</li> <li>• The company routinely conducts outreach to contractors and workers regarding compliance with regulations and policies that apply within the company such as implementing OHS while working, fulfilling labor rights, environmental management and others. The socialization is carried out at least once a year. These provisions are also stated in the work agreement letter.</li> <li>• The contractor has provided PPE for the workers</li> <li>• The contractor has also paid wages according to the minimum wage provisions in force in Kampar Regency and provided other benefits, such as rice allowance.</li> <li>• While working with the company, the contractor said that he had no complaints.</li> <li>• The cooperation and communication that has been established so far has been quite good</li> </ul>	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.

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>PK Contractor (PT Suri Adidaya Kapuas)</b> Operational Head March 1<sup>st</sup>, 2023</p> <ul style="list-style-type: none"> <li>The form of cooperation between the contractor and the company is the transportation of PK to the factory units.</li> <li>The company routinely conducts outreach to contractors and workers regarding compliance with regulations and policies that apply within the company such as implementing OHS while working, fulfilling labor rights, environmental management and others. The socialization is carried out at least once a year. These provisions are also stated in the work agreement letter.</li> <li>The contractor has provided PPE for the workers</li> <li>The contractor has also paid wages according to the minimum wage provisions in force in Kampar Regency and provided other benefits, such as rice allowance.</li> <li>While working with the company, the contractor said that he had no complaints.</li> <li>The cooperation and communication that has been established so far has been quite good</li> </ul>	<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>Agriculture, Livestock and Plantation Agency of Ketapang Regency</b> Interviewee: Seeding and Plantation Protection Sub-Coordinator 28 February 2023</p> <ul style="list-style-type: none"> <li>The plantation business assessment has done in 2021.</li> <li>In general, unit of certification has routinely submitted mandatory reports, such as 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 28 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> </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>Agency routinely conducts supervision at the company. 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><b>Manpower and Transmigration Agency of Ketapang Regency</b> Interviewee: Industrial Relation Mediator 28 February 2023</p> <ul style="list-style-type: none"> <li>Unit of certification has implemented a minimum wage and provide other benefits to workers.</li> <li>Has included its workers in the <i>BPJS</i> employment and health program.</li> <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>There are no negative issues that need further clarification.</p>
<p><b>National Land Agency Agency of Ketapang Regency</b> Interviewee: Head of Administrative Subdivision 28 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>Sub Village of Badak Berendam of Seriam Village</li> <li>Sub Village of Pulau Bawal of Kendawangan Kiri Village</li> </ul> 28 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> </ul>	<p>There are no negative issues that need further clarification.</p>

<b>4.0</b>	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>
<b>4.1</b>	<b>Formal Sign-off of Assessment Findings</b>
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p style="text-align: center;">Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end; margin-top: 100px;"> <div style="text-align: center;"> <p><b>PT Agro Sejahtera Manunggal</b> <b>Management Representative</b></p>  <p><b><u>Jonnes Daulay</u></b> Friday, 02 June 2023</p> </div> <div style="text-align: center;"> <p><b>MUTU International</b> <b>Lead Auditor</b></p>  <p><b><u>Briyogi Shadiwa</u></b> Friday, 02 June 2023</p> </div> </div>



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

No	Institution/NGO/ Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Gender Committee of PRYM unit (PT ASM)	PT ASM	-	Direct Interview	01 March 2023	✓	
2	Gender Committee of PRYE, BRYE and BLRE units (PT ASM) and TRNE unit (PT GHL)	PT ASM and PT GHL	-	Direct Interview	01-03 March 2023	✓	
3	LKS Bipartite	PT ASM and PT GHL	-	Direct Interview	01-03 March 2023	✓	
4	Employee Cooperative	PT ASM and Pt GHL	-	Direct Interview	01 March 2023	✓	
5	CPO Contractor	Ketapang Regency	-	By Phone	01 March 2023	✓	
6	PK Contractor	Ketapang Regency	-	By Phone	01 March 2023	✓	
7	Manpower and Transmigration Agency	Ketapang Regency		Interview via telephone	28 February 2023	✓	
8	Public Housing, Settlement Areas and Environmental Agency	Ketapang Regency		Interview via telephone	28 February 2023	✓	
9	National Land Agency	Ketapang Regency		Interview via telephone	28 February 2023	✓	
10	Agriculture, Livestock and Plantation Agency	Ketapang Regency		Interview via telephone	01 March 2023	✓	
11	<ul style="list-style-type: none"> <li>Badak Berendam Sub-Village of Seriam Village</li> <li>Pulau Bawal Sub-Village of Kendawangan Kiri Village</li> </ul>	Ketapang Regency	-	Direct Interview	28 February 2023	✓	
12	Previous Land Owner from Seriam Village	Ketapang Regency	-	Direct Interview	28 February 2023	✓	
13	Agro Seriam Mandiri Cooperative	Ketapang Regency	-	Direct Interview	28 February 2023	✓	
14	Pembangunan Raya POM: <ul style="list-style-type: none"> <li>2 security</li> <li>2 grading workers</li> <li>1 sterilizer operator</li> <li>1 worker in loading ramp station</li> <li>1 worker in engine room</li> <li>3 workers in Boiler station</li> <li>1 worker in nut and kernel station</li> <li>4 worker emergency response</li> <li>1 Mechanical Head</li> <li>1 Workshop Operator</li> <li>2 Storage Operators</li> <li>1 WTP Operator</li> </ul>	PT ASM	-	Direct Interview	February 28 <sup>th</sup> , 2023	✓	

No	Institution/NGO/ Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
	<ul style="list-style-type: none"> <li>1 WWTP Operator</li> </ul>						
15	Bengkuang Raya Estate: <ul style="list-style-type: none"> <li>2 daycare workers</li> <li>1 resident of employee housing</li> <li>1 warehouse/storage workers</li> <li>2 workshop workers</li> <li>1 fire commander</li> <li>5 medical personnel</li> <li>1 foreman and 3 harvesters</li> <li>1 Foreman Coordinator</li> <li>5 Worker in Beneficial Plant</li> <li>2 FFB loader</li> <li>1 Foreman and 4 upkeep workers (pesticide operators)</li> <li>1 Foreman and 3 upkeep workers (Fertilizer operators)</li> <li>1 Foreman Research and Development</li> <li>1 Foreman Plant Pest</li> </ul>	PT ASM	-	Direct Interview	February 28 <sup>th</sup> , 2023	✓	
16	Pembangunan Raya Estate: <ul style="list-style-type: none"> <li>3 spraying workers</li> <li>18 manuring workers</li> <li>2 harvest workers</li> <li>3 road maintenance workers</li> <li>1 Foreman Research and Development</li> <li>1 Foreman Plant Pest</li> <li>3 Storage Operators</li> <li>2 Firefighting Officers</li> <li>1 Resident of Housing Complex</li> <li>1 Day-care Officer</li> <li>1 Genset Operator</li> </ul>	PT ASM	-	Direct Interview	March 1 <sup>st</sup> , 2023	✓	
17	Belaban Raya Estate: <ul style="list-style-type: none"> <li>3 manuring workers</li> <li>3 spraying workers</li> <li>3 harvest workers</li> </ul>	PT ASM	-	Direct Interview	March 2 <sup>nd</sup> , 2023	✓	
18	Teluk Rengit Estate: <ul style="list-style-type: none"> <li>4 manuring workers</li> <li>3 spraying workers</li> </ul>	PT GHL	-	Direct Interview	March 3 <sup>rd</sup> , 2023	✓	

No	Institution/NGO/ Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
	<ul style="list-style-type: none"> <li>• 2 harvest workers and 1 pick-up loose fruit worker</li> <li>• 2 FFB loader</li> <li>• 1 Foreman Research and Development</li> <li>• 1 Foreman Plant Pest</li> </ul>						
19	Jikalahari	Indonesia	sekretariat@jikalahari.org	By E-mail	February 21 <sup>st</sup> , 2023		✓
20	Perkumpulan Elang	Indonesia	sekretariat@elang.or.id	By E-mail	February 21 <sup>st</sup> , 2023		✓
21	Greenpeace	Indonesia	supporterservices.id@greenpeace.org	By E-mail	February 21 <sup>st</sup> , 2023		✓
22	Sawit Watch	Indonesia	info@sawitwatch.or.id	By E-mail	February 21 <sup>st</sup> , 2023		✓

**Appendix 2. Assessment Program**

DATE	27 February – 5 March 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
<b>Monday, 27 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 AGRO SEJAHTERA MANUNGGAL	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, 28 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 Bengkuang Raya 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>of Employment Procedure and Mechanism Aspect</li> <li>Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>Interview with related personels 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 Pembangunan Raya POM</b> <ul style="list-style-type: none"> <li>Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch 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> Presentation of Daily Progress	FIT  SIA & BRI  ELU  All Auditor
<b>Wednesday, 1 March 2023</b>		
	<b>Field Observation to Pembangunan Raya &amp; Cooperative Agro Seriam Mandiri</b> Aspect to be verified:	

DATE	27 February – 5 March 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 12.00	<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 personels 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>Document review and completing audit checklist.</li> <li>Stakeholder Interview:               <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> <li>Presentation of Daily Progress.</li> </ul>	All Auditor SIA & BRI FIT & ELU BRI All Auditor
<b>Thursday, 2 March 2023</b>		
08.00 – 12.00	<b>Field Observation to Belaban Raya 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 personels 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	Document review and completing audit checklist. Presentation of Daily Progress.	All Auditor All Auditor
<b>Friday, 3 March 2023</b>		

DATE	27 February – 5 March 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 12.00	<b>Field Observation to Teluk Rengit Estate &amp; Cooperative Bawal Sejahtera Mandiri</b> Aspect to be verifie: <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 personels 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	Document review and completing audit checklist.	All Auditor
	Presentation of Daily Progress.	All Auditor
<b>Saturday, 4 March 2023</b>		
08.00 – 11.00	Document review and completing audit checklist.	All Auditor
11.00 – 14.00	Internal Team Discussion	All Auditor
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>	All Auditor
<b>Sunday, 5 March 2023</b>		
09.15 – 10.05	<b>KETAPANG (KTG) → PONTIANAK (PNK)</b>	All Auditor
13.45 – 15.15	<b>PONTIANAK (PNK) → JAKARTA (CGK)</b>	All Auditor