

Roundtable on Sustainable Palm Oil Certification
R S P O

[✓] Surveillance

Name of Management : Jakluay Palm Oil Mill, PT Tapian Nadenggan subsidiary of Golden Agri Organisation Resources Holdings Ltd.

Plantation Name : Jakluay Estate, Pantun Mas Estate, Long Buluh Estate and Bukit Subur Estate

Location : Village of Jakluay, Sub District of Muara Wahau, District of Kutai Timur, Province of Kalimantan Timur, Indonesia

Certificate Code : **MUTU-RSPO/145**

Date of Initial Registration : 10 April 2015

Date of Last Issued : 26 April 2021 Date of License Issue : 26 July 2023

Date of Certificate Expiry : 25 April 2026 Date of License Expiry : 25 April 2024

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.2	28 March – 01 April 2023	Rizliani Aprianita Hasibuan (Lead Auditor), Tasya Aishah Silalahi, Sentot Adi Subandono, and Alfiany Sukmawati	Moh Arif Yusni	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.2	16 July 2023

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 on March 12th, 2014 with registration number **ASI-ACC-055**

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Figure 1. Location Map of PT Tapian Nadenggan

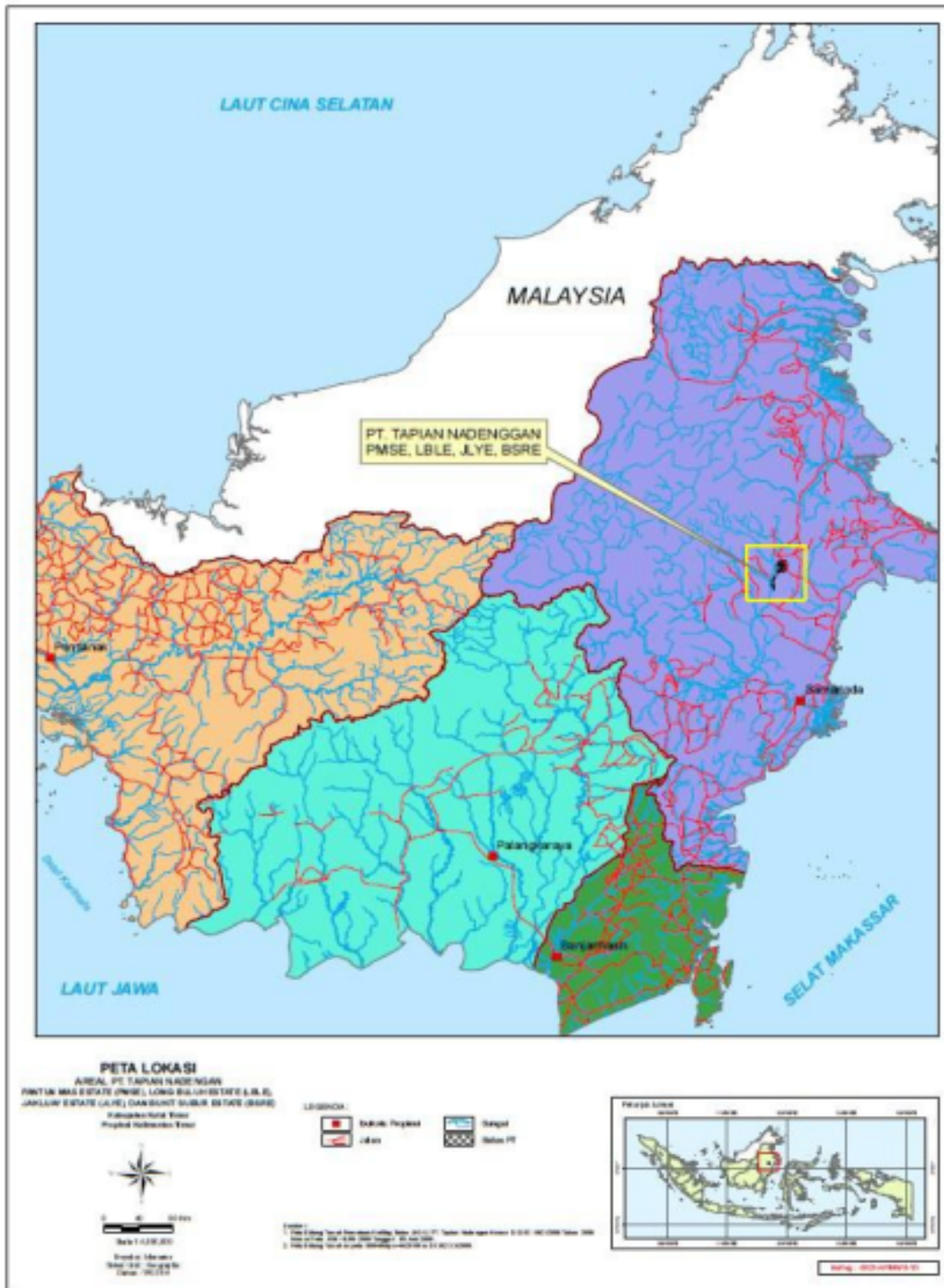
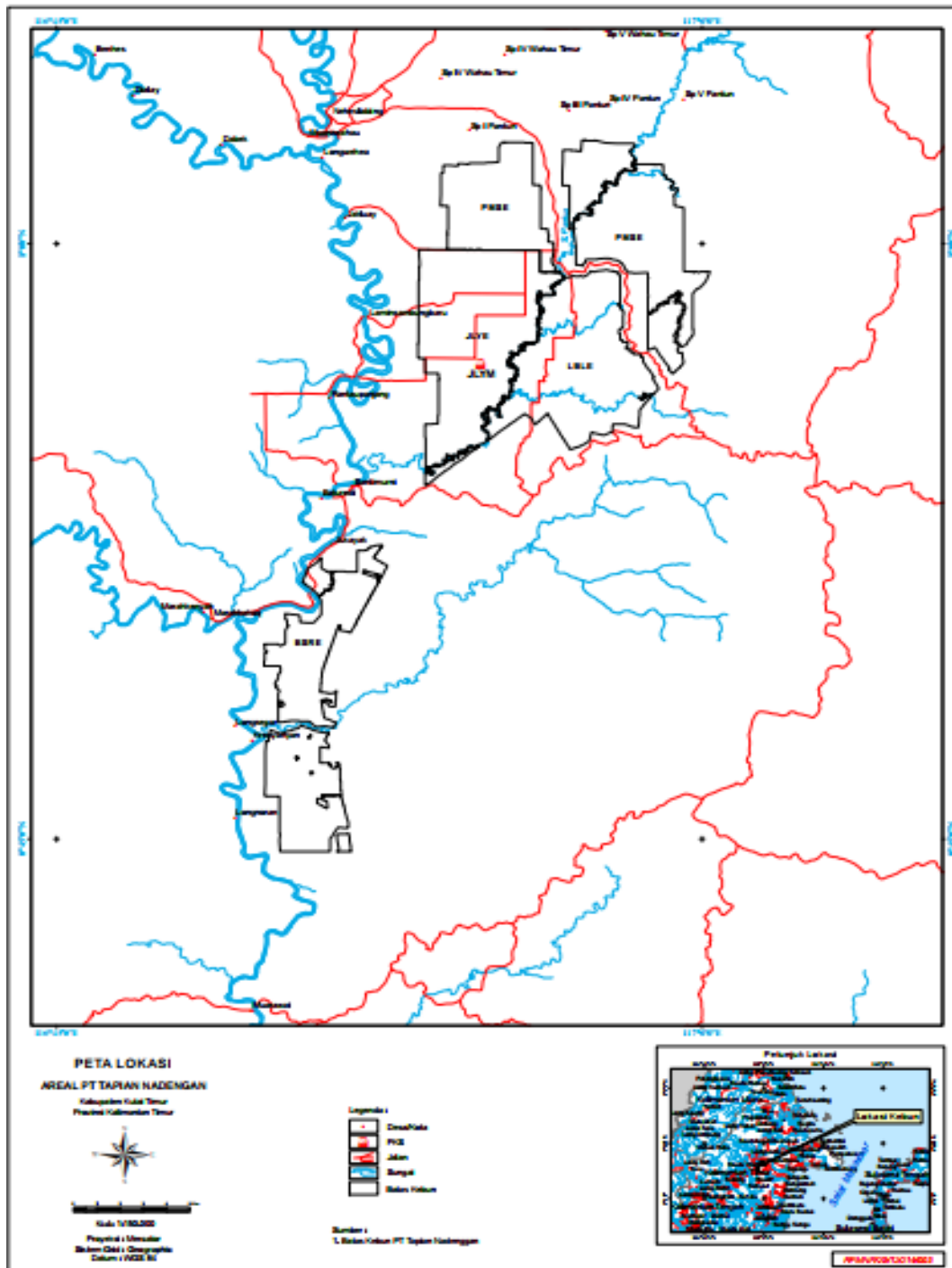


Figure 2. Operational Map of PT Tapian Nadenggan



Abbreviations Used

AMDAL	:	<i>Analisa Mengenai Dampak Lingkungan</i>
ASA	:	Annual Surveillance Assessment
BHB	:	<i>Buruh Harian Borongan</i>
BHL	:	<i>Buruh Harian Lepas</i>
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial / Workers Social Security Agency</i>
BPJN	:	<i>Badan Pertanahan Nasional / National Land Agency</i>
BSRA	:	Bukit Subur Plasma
BSRE	:	Bukit Subur Estate
CB	:	Certification Body
CEO	:	Chief Executive Officer
CFO	:	Chief Financial Officer
CLA	:	Collective Labour Agreement / <i>Perjanjian Kerja Bersama</i>
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate social responsibility
DLW	:	Decent Living Wage
EBA	:	Empty Bunch Area
EFB	:	Empty Fruit Bunch
FFB	:	Fresh Fruit Bunch
FPIC	:	Free, Prior and Informed Consent
GAR	:	Golden Agri Resources
GHG	:	Greenhouse Gases
GPS	:	Global Positioning System
HCV	:	High Conservation Value
HGB	:	<i>Hak Guna Bangunan / Building Right Title</i>
HGU	:	<i>Hak Guna Usaha / Land Use Title</i>
HIRAC	:	Hazard Identification Risk Assessment & Control
ICS	:	Internal Control System
IDR	:	Indonesian Rupiah
ISBPR	:	Hazard Identification Risk Assessment & Control
ISPO	:	Indonesia Sustainable Palm Oil
JLYA	:	Jakluay Plasma
JLYE	:	Jakluay Estate
JLYM	:	Jakluay Mill
KAN	:	<i>Komite Akreditasi Nasional</i>
KUD	:	<i>Koperasi Unit Desa Village Cooperative Unit</i>
LB3	:	<i>Limbah Bahan Berbahaya dan Beracun / Hazardous Waste and Toxic</i>
LBLE	:	Long Buluh Estate
LKS	:	<i>Lembaga Kerja Sama / Cooperation Institution</i>
LUCA	:	Land Use Change Analysis
LPUP	:	<i>Laporan Perkembangan Usaha Perkebunan</i>
MB	:	Mass Balance
MD	:	Management Development
MSDS	:	Material Safety Data Sheet
NPWP	:	<i>Nomor Pokok Wajib Pajak</i>
OHS	:	Occupational Health and Safety
OIA	:	Operational Internal Audit
P&C	:	Principles and Criteria

P2K3	:	<i>Panitia Pembinaan Keselamatan & Kesehatan Kerja / Guiding Committee Of Occupational Safety & Health</i>
PIC	:	Person In Charge
PK	:	Palm Kernel
PKWT	:	<i>Perjanjian Kerja Waktu Tertentu / Contract worker</i>
PKWTT	:	<i>Perjanjian Kerja Waktu Tidak Tertentu / Permanent worker</i>
PMSE	:	Pantun Mas Estate
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PT TN	:	PT Tapisan Nadenggan
RC	:	Recertification
RKL	:	<i>Rencana Kelola Lingkungan</i>
RPL	:	<i>Rencana Pemantauan Lingkungan</i>
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened, & Endangered
SCCS	:	Supply Chain Certification Standard
SHM	:	<i>Surat Hak Milik</i>
SIA	:	Social Impact Assessment
SKKL	:	<i>Surat Keputusan Kelayakan Lingkungan</i>
SKU-B	:	<i>Syarat Kerja Umum-Bulanan / Unit payment monthly</i>
SKU-H	:	<i>Syarat Kerja Umum-Bulanan / Unit payment daily</i>
SOP	:	Standard Operational Procedure
SPK	:	<i>Surat Perjanjian Kerja / Work Agreement</i>
SPL	:	<i>Surat Perintah Lembur / Overtime warrant</i>
SPM	:	<i>Serikat Pekerja Mandiri</i>
THR	:	<i>Tunjangan Hari Raya</i>
TTE	:	<i>Tanda Terima Elektronik</i>
UMK	:	<i>Upah Minimum Kabupaten</i>
UPTD	:	<i>Unit Pelaksana Teknis Daerah</i>
WLTk	:	<i>Wajib Laporkan Tenaga Kerja / Employment Report</i>
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT										
1.1	Assessment Standard Used	<ul style="list-style-type: none"> • RSPO Certifications Systems for Principles & Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020). • Indonesia National Interpretation RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSPO Board of Governors on 20th April 2020. 									
1.2	Organisation Information										
1.2.1	Organisation name listed in the certificate	PT Tapian Nadenggan subsidiary of Golden Agri Resources Ltd.									
1.2.2	Contact person	Yahya Mustakim									
1.2.3	Organisation address and site address	RSPO registered company: 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535. Liaison Office: Sinar Mas Land Plaza, Tower II, 30th Floor. Jl. MH Thamrin No. 51, Jakarta 10350, Indonesia.									
1.2.4	Telephone	(+62-21) 50338899									
1.2.5	Fax	(+62-21) 50389999									
1.2.6	E-mail	yahya.mustakim@sinar-mas-agri.com									
1.2.7	Web page address	www.goldenagri.com.sg									
1.2.8	Management Representative who completed the application for certification	Yahya Mustakim (Head of Sustainability Management System and Certification Operations Sustainability)									
1.2.9	Registered as RSPO member	1-0096-11-000-00 – 30 January 2005									
1.3	Type of Assessment										
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: Jakluay POM, Jakluay Estate, Pantun Mas Estate, Long Buluh Estate and Bukit Subur Estate.									
1.3.2	Type of certificate	Single									
1.4	Locations of Mill and Plantation										
1.4.1	Location of Mill										
	Name of Mill	Location	<table border="1"> <thead> <tr> <th colspan="2">Coordinate</th> </tr> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>N 0° 56' 58.92"</td> <td>E 116° 54' 51.84"</td> </tr> </tbody> </table>	Coordinate		Latitude	Longitude	N 0° 56' 58.92"	E 116° 54' 51.84"		
Coordinate											
Latitude	Longitude										
N 0° 56' 58.92"	E 116° 54' 51.84"										
	Jakluay POM	Jakluay Village, Muara Wahau Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia									
1.4.2	Location of Certification Scope of Supply Base										
	Name of Supply Base	Location	<table border="1"> <thead> <tr> <th colspan="2">Coordinate</th> </tr> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>N 0° 58' 24.17"</td> <td>E 116° 55' 52.77"</td> </tr> <tr> <td>N 1° 0' 55.10"</td> <td>E 116° 57' 9.19"</td> </tr> </tbody> </table>	Coordinate		Latitude	Longitude	N 0° 58' 24.17"	E 116° 55' 52.77"	N 1° 0' 55.10"	E 116° 57' 9.19"
Coordinate											
Latitude	Longitude										
N 0° 58' 24.17"	E 116° 55' 52.77"										
N 1° 0' 55.10"	E 116° 57' 9.19"										
	Jakluay Estate	Jakluay Village, Muara Wahau Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia									
	Pantun Mas Estate	Sidomulyo Village, Kongbeng Sub District, Kutai Timur District, Kalimantan Timur									

		Province, Indonesia				
	Long Buluh Estate	Jakluay Village, Muara Wahau Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	N 0° 58' 0.97"	E 116° 57' 3.18"		
	Bukit Subur Estate	Jukayak Village, Telen Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	N 0° 49' 9.69"	E 116° 50' 29.66"		
1.5	Description of Area Statement					
1.5.1	Tenure					
	• State		HGU = 16.241,3679 Ha HGB = 10.29 Ha			
	• Community		- Ha			
	*There is a reduction in the scope of the BSRE cadastral area of 569.62 Ha because the area has not been included in the HCV assessment. So, the total scope of certification is 15,671.75 Ha.					
1.5.2	Area Statement					
	Total Area		15,671.75	Ha		
	Mature Area		13,077.22	Ha		
	Mill		10,29	Ha		
	Building		125,27	Ha		
	Road		793,45	Ha		
	Trench/Swamp/river		116,68	Ha		
	Airstrip		29,52	Ha		
	Others area		985,32	Ha		
	Reserve area		534,00	Ha		
	*HCV		381.49	Ha		
* HCV area covering an area of 381.49 Ha, overlapping in other areas such as reserved Area, Steep Area, Shrubs, Planted Area, and Others Area.						
** Shrubs areas, steep areas, reserve areas and other areas are areas that have not been planted so far. As in steep areas only cover crops are planted. Reserved area is an area that still has the possibility to be planted, so that it is included in the reserved area category. Shrubs are areas of underbrush that cannot be planted.						
1.6	Planting Year and Cycles					
1.6.1	Age profile of planting year					
	Planting Year	Hectarage (Ha)				
		Jakluay Estate	Pantun Mas Estate	Long Buluh Estate	Bukit Subur Estate	Total
	2000	1,112.58	984.24	-	-	2,096.82
	2001	358.96	237.60	-	-	596.56
	2005	226.23	814.06	-	-	1,040.29
	2006	869.34	708.04	279.56	-	1,856.94
	2007	102.71	1,136.40	1,539.61	-	2,778.72
	2008	-	123.09	871.59	397.04	1,391.72
	2009	477.73		-	892.91	1,370.64
	2010	252.32	310.98	-	470.22	1,033.52
	2011	-	122.30	-	484.39	606.69
	2012	-	-	-	253.88	253.88

	2014	-	-	-	51.44	51.44	
	Total	3,399.87	4,436.71	2,690.76	2,549.88	13,077.22	
1.6.2	New Planting area after January 2010		1,945.53 Ha				
1.6.3	Planting Cycle		1 st 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 (%)
	Jakluay POM	80	457,288	93,649	20.48	24,495	5.36
	*Production data source from March 2022 – February 2023						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/h a/year)	Supplied to Mill	
						FFB (tonnes/ year)	%
	Jakluay Estate	3,845.74	3,399.87	79,369.62	23.34	79,369.62	100
	Pantun Mas Estate	5,072.32	4,436.71	100,908.27	22.74	100,908.27	100
	Long Buluh Estate	3,489.14	2,690.76	42,433.13	15.77	42,433.13	100
	Bukit Subur Estate	3,264.55	2,549.88	30,738.23	12.05	30,738.23	100
	TOTAL	15,671.75	13,077.22	253,449.25	19.38	253,449.25	100
	*Production data source from March 2022 – February 2023						
1.7.3	FFB description from other source						
	Name of sources/Organisation (RSPO certified / non-certified)	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Long Buluh Estate (Non-Certified)	PT Tapan Nadenggan	-	-	21,320.87		
	Bukit Subur Estate (Non-Certified)	PT Tapan Nadenggan	-	-	2,959.50		
	Jakluay Plasma (Non-Certified)	PT Tapan Nadenggan	984	2,979.56	75,507.39		
	Bukit Subur Plasma (Non-Certified)	PT Tapan Nadenggan	352	712.29	9,041.97		
	PT DSN Group (Non-Certified)	Independent Supplier	-	-	5,052.84		
	Serba Usaha Pantun Jaya Cooperative (Non-Certified)	Independent Supplier	-	-	8,970.71		
	Prima Pantun Cooperative (Non- Certified)	Independent Supplier	-	-	10,330.31		
	Sawit Harapan Jaya Cooperative (Non-Certified)	Independent Supplier	-	-	2,824.54		
	Gapoktan Etam Sejahtera Cooperative (Non-Certified)	Independent Supplier	-	-	19,355.62		
	Siti Aisyah (Non-Certified)	Independent Supplier	-	-	3,797.41		
	Kelompok Tani Sumber Sejahtera (Non-Certified)	Independent Supplier	-	-	7,581.05		
	Sawit Subur Abadi Cooperative	Independent Supplier	-	-	4,180.80		

	(Non-Certified)							
	Agustono (Non-Certified)	Independent Supplier	-	-	150.69			
	CV Mitra Telen Abadi (Non-Certified)	Independent Supplier	-	-	2,374.71			
	Usaha Tani Lestari Jaya Cooperative (Non-Certified)	Independent Supplier	-	-	5,070.08			
	Perkebunan Kombeng Bersatu Cooperative (Non-Certified)	Independent Supplier	-	-	11,775.39			
	CV Three Putra (Non-Certified)	Independent Supplier	-	-	13,219.87			
	CV Joya Anugrah Jaya (Non-Certified)	Independent Supplier			77.30			
	TOTAL				203,591.05			
	*Production data source from March 2022 – February 2023							
1.7.4	Product categories		FFB, CPO, PK					
1.8	Estimate Tonnage of Certified Product							
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume + Ext Volume (MT)	Last Year Actual Certified Volume (MT)				
	FFB Processed		245,000	253,449.25				
	CPO Production		54,000	52,969.69				
	Palm Kernel (PK) Production		14,000	13,797.29				
1.8.2	Product selling							
	Type of selling product	Actual selling product for last year (MT)						
	CSPO sold as RSPO certified product	0						
	CSPK sold as RSPO certified product	12,653.62						
	CSPO sold under another scheme	0						
	CSPK sold under another scheme	0						
	CSPO sold as conventional	49,670.77						
	CSPK sold as conventional							
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Jakluay Estate	3,845.74	3,399.87	83,500	24.56			
	Pantun Mas Estate	5,072.32	4,436.71	106,000	23.89			
	Long Buluh Estate	3,489.14	2,690.76	45,000	16.72			
	Bukit Subur Estate	3,264.55	2,549.88	32,500	12.75			
	TOTAL	15,671.75	13,077.22	267,000	20.42			
	*Projected FFB production for 12 months of certificate							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO	Palm Kernel	Supply Chain Module		
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	

	Jakluay POM	80	267,000	58,800	22.00	14,700	5.50	MB
	*Projected CSPO and CSPK production for 12 months of certificate							
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			-				
	Others			ISPO (MUTU-ISPO/244) valid thru 18 July 2026 by Mutu International				
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							
Pangkalan Panji Mill (PT Sawit Mas Sejahtera)	2013	Sawit Mas Estate	2013	Sumatera Selatan Province	Certified			
		Sawit Mas Estate (HGU on progress – 2,291 Ha)	2024		-			
Bumi Sawit Mill (PT Bumi Sawit Permai)	2013	Bumi Sawit Estate	2013	Sumatera Selatan Province	Certified			
		Bumi Sawit Estate (HGU on progress – 773.39 Ha)	2024		-			
Muara Kandis Mill (PT Djuanda Sawit Lestari)	2013	Muara Tawas Estate	2013	Sumatera Selatan Province	Certified			
		Muara Kandis Estate	2013		Certified			
		Muara Kandis Estate (HGU on progress – 418.49 Ha)	2023		-			
		Muara Tawas Estate (HGU on progress – 57.7 Ha)	2023		-			
		Smallholder (KKPA Pandawa)	2024		-			
Sungai Rungau Mill (PT Sumber Indah Perkasa)	2013	Sungai Rungau Estate	2013	Kalimantan Tengah Province	Certified			
		Sungai Seruyan Estate	2013		Certified			
		Terawan Estate	2013		Certified			
		Tangar Estate	2013		Certified			
		Bukit Tiga Estate	2013		Certified			
Bukit Perak Mill (PT Bumi Permai Lestari)	2013	Bukit Perak Estate	2013	Bangka Belitung Province	Certified			
		Bukit Permata Estate	2013		Certified			
		Bukit Permai Estate (PT Agrolestari Subur Sejahtera)	2024		-			
		Bukit Lestari estate (PT Agrolestari Hijau Sentosa)	2024		-			
	2013	Tanjung Kembiri Estate	2013		Certified			

Tanjung Kembiri Mill (PT Forestalestari Dwikarya)		Tanjung Rusa Estate	2013	Bangka Belitung Province	Certified
		Tanjung Rusa Estate (HGU on process 48.81 Ha)	2024		-
		Tanjung Sawit Estate (PT Palmindo Biliton Berjaya)	2024		-
		Tanjung Sawit Plasma (PT Palmindo Biliton Berjaya)	2024		-
		Tanjung Rusa KKPA	2024		-
Sungai Buaya Mill (PT Sumber Indah Perkasa)	2014	Sungai Buaya Estate	2014	Lampung Province	Certified
		Sungai Buaya Estate (HGU on process – 155.46 Ha)	2024		-
		Smallholder (KKPA Gedung Aji Lama)	2014		Certified
		Smallholder (KKPA Mesuji)	2014		Certified
Sungai Merah Mill (PT Sumber Indah Perkasa)	2014	Sungai Merah Estate	2014	Lampung Province	Certified
		Sungai Merah Estate (HGU on process – 241.54 Ha)	2024		-
		Smallholder (KKPA Gedung Aji Baru)	2014		Certified
Kasuari Mill (PT Sinar Kencana Inti Perkasa)	2023	Cendrawasih Estate	2023	Papua Province	ST-1
		Nuri Estate	2023		ST-1
		Rajawali Estate	2023		ST-1
		Mambruk Estate (PT Sumber Indah Perkasa)	2023		ST-1
Pekawai Mill (PT Agrolestari Mandiri)	2023	Kayung Estate	2023	Kalimantan Barat Province	ST-1
		Pekawai Estate	2023		ST-1
		Sungai Kelik Estate	2023		ST-1
		Nanga Tayap Estate	2023		ST-1
		Smallholder (Kayung Plasma)	2024		ST-1
Kenanga Mill (PT Kencana Graha Permai)	2014	Kencana Estate	2015	Kalimantan Barat Province	Certified
		Cendana Estate	2015		Certified
		Kenanga Estate (PT Cahaya Nusa Gemilang)	2023		-

		Delima Estate (PT Kencana Graha Permai)	2023		-
		Smallholder (Kencana Plasma)	2024		-
		Smallholder (Kenanga Plasma)	2024		-
Perdana Mill (PT Binasawit Abadi Pratama)	2025	Perdana Estate	2025	Kalimantan Tengah Province	ST-1
		Langgana Estate	2025		ST-1
		Semandau Estate	2025		ST-1
		Muara Dua Estate	2025		ST-1
Kuayan Mill (PT Agrokarya Prima Lestari)	2025	Bukit Santuhai Estate	2025	Kalimantan Tengah Province	ST-1
		Tajur Beras Estate	2025		ST-1
		Seranau Estate	2025		ST-1
		Sungai Sambon Plasma	2025		-
		Sapiri Estate (PT Buana Adhitama)	2025		ST-1
		Sapiri Plasma	2025		-
		Bukit Dua Estate (PT Buana Adhitama)	2025		-
Belian Mill (PT Paramitra Internusa Pratama) * Main Audit Desember 2022	2022*	Belian Estate * Main Audit Desember 2022	2022	Kalimantan Barat Province	ST-1
		Tengkawang Estate * Main Audit Desember 2022	2022		ST-1
		Muara Tawang Estate (PT Kartika Prima Cipta)	2023		ST-1
		Kapuas Hulu Estate (PT Persada Graha Mandiri)	2023		ST-1
		Sungai Beran Estate (PT Persada Graha Mandiri)	2023		ST-1
		Smallholder (Belian KKPA)	2024		-
		Smallholder (Muara Tawang KKPA)	2024		-
		Smallholders (Kapuas Hulu KKPA)	2024		-
Sungai Kupang Mill (PT Sinar Kencana Inti Perkasa)	2020	Sungai Kupang Estate	2020	Kalimantan Selatan Province	Certified
		Sungai Kupang KKPA	2024		-
Sungai Kikim Mill (PT Sawit Mas Sejahtera)	2023	Sungai Kikim Estate	2023	Sumatera Selatan Province	-
		Sungai Pangi Estate	2023		-
		Sungai Musi Estate	2023		-
		Sungai Saling Estate	2023		-
		Sungai Enim Estate (PT Bumi Sawit Permai)	2023		-

		Sungai Lematang Estate (PT Bumi Sawit Permai)	2023		-
		Sungai Bungur Estate (PT Prima Cipta Mandiri)	2023		-
		Sungai Lingsing Estate (PT Prima Cipta Mandiri)	2023		-
Tangar Mill (PT Mitrakarya Agroindo)	2025	Sulin Estate	2025	Kalimantan Tengah Province	-
		Sulin Plasma	2025		-
		Nahiyang Estate	2025		-
		Katayang Estate	2025		-
Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa)	2023	Sungai Magalau Estate	2023	Kalimantan Selatan Province	-
		Senakin Estate	2023		-
		Sungai Manunggul Estate (PT Mitra Nusa Permata)	2023		-
Jalemo Mill (PT Agro Lestari Sentosa)	2025	Jalemo Estate	2025	Kalimantan Tengah Province	-
		Kajui Estate (PT Agro Lestari Sentosa)	2025		-
		Manuhing Estate (PT Agro Lestari Sentosa)	2025		-
		Manuhing KKPA	2025		-
Sako Mill (PT Adi Tunggal Mahajaya)	2025	Mentaya Estate	2025	Kalimantan Tengah Province	ST-1
		Kuayan Estate	2025		ST-1
		Sako Plasma	2025		-
		Sungai Ayawan Estate	2025		-
		Sungai Nusa Estate	2025		-
Padang Halaban Mill (PT SMART Tbk)	2011	Padang Halaban Estate	2011	Sumatera Utara Province	Certified
		Pernantian Estate	2011		Certified
		Adipati Estate	2011		Certified
		Kanopan Ulu Estate	2011		Certified
Batu Ampar Mill (PT SMART Tbk)	2012	Batu Ampar Estate	2012	Kalimantan Selatan Province	Certified
		Batu Mulia Estate	2012		Certified
		Sungai Panci Estate	2012		Certified
		Sungai Panci KKPA	2012		Certified
Tanah Laut Mill (PT SMART Tbk)	2012	Tanah Laut Estate	2012	Kalimantan Selatan Province	Certified
		Kintapura Estate	2012		Certified
		Kintapura Estate (HGU on process - 636.33 Ha)	2024		-
Langga Payung Mill (PT Tapian Nadenggan)	2012	Langga Payung Estate	2012	Sumatera Utara Province	Certified
		Paya Baung Estate	2012		Certified
		Normark Estate	2012		Certified

Hanau Mill (PT Tapian Nadenggan)	2012	Hanau Estate	2012	Kalimantan Tengah Province	Certified
		Tasik Mas Estate	2012		Certified
		Tanjung Paring Estate	2012		Certified
		Langadang Estate	2012		Certified
		Medang Sari Estate (PT Satya Kisma Usaha)	2025		-
Semilar Mill (PT Tapian Nadenggan)	2013	Semilar Estate	2013	Kalimantan Tengah Province	Certified
		Sei Rindu Estate	2013		Certified
		Mandang Estate (PT Buana Arta Sejahtera)	2013		Certified
		Puri Estate (PT Buana Arta Sejahtera)	2013		Certified
Jak Luay Mill (PT Tapian Nadenggan)	2015	Pantun Mas Estate	2015	Kalimantan Timur Province	Certified
		Jak Luay Estate	2015		Certified
		Jak Luay KKPA	2024		-
		Long Buluh Estate	2015		Certified
		Long Buluh Estate (HGU on progress - 329.66 Ha)	2024		-
		Bukit Subur Estate	2015		Certified
		Bukit Subur Estate (HCV identification on process - 569.62 Ha)	2024		-
		Bukit Subur KKPA	2024		-
Leidong West Mill (PT MP Leidong West Indonesia)	2014	Leidong West Utara Estate	2014	Bangka Belitung Province	Certified
		Leidong West Selatan Estate	2014		Certified
		Bukit Intan Estate (PT Bumipermai Lestari)	2014		Certified
		Bukit Mas Estate (PT Bumipermai Lestari)	2014		Certified
Muara Wahau Mill (PT Kresna Duta Agroindo)	2014	Muara Wahau Estate	2014	Kalimantan Timur Province	Certified
		Gunung Kombeng	2014		Certified
Gunung Kombeng Mill (PT Kresna Duta Agroindo)	2024	Gunung Kombeng KKPA	2024	Kalimantan Timur Province	-
Rantau Panjang (PT Kresna Duta Agroindo)	2023	Rantau Panjang Estate	2023	Kalimantan Timur Province	-
		Rantau Panjang KKPA	2024		-
Jelatang Mill (PT Kresna Duta Agroindo)	2014	Bangko Estate	2014	Jambi Province	Certified
	2020	Pelakar Estate	2020	Jambi Province	Certified

Pelakar Mill (PT Kresna Duta Agroindo)		Batang Merangin Estate	2020		Certified
		Tiga Serumpun KKPA	2024		-
Langling Mill (PT Kresna Duta Agroindo)	2014	Bangko Estate	2014	Jambi Province	Certified
		Batang Gading Estate (PT Satya Kisma Usaha)	2023		-
		Batang Gading KKPA (PT Satya Kisma Usaha)	2024		-
Sungai Bengkal Mill (PT Satya Kisma Usaha)	2015	Sungai Bengkal Estate	2015	Jambi Province	Certified
		Sungai Bengkal Estate	2015		Certified
		Sungai Bengkal KKPA	2015		Certified
		Sungai Bengkal KKPA	2015		Certified
		Muara Kilis Estate	2015		Certified
		Muara Kilis Estate	2015		Certified
		Kilis KKPA	2024		-
Bukit Kapur Mill (PT SMART Tbk)	2025	Bukit Kapur Estate	2025	Kalimantan Selatan Province	ST-1
		Sungai Cantung Estate	2025		ST-1
Samsam Mill (PT Ivo Mas Tunggal)	2009	Samsam Estate	2009	Riau Province	Certified
		Samsam Estate (HGU on progress – 29.09 Ha)	2024		-
		Kandista Estate	2009		Certified
		Kandista Estate (HGU on progress – 158.46 Ha)	2024		-
		Palapa Estate	2009		Certified
Libo Mill (PT Ivo Mas Tunggal)	2009	Libo Estate	2009	Riau Province	Certified
		Nenggala Estate	2009		Certified
		Nenggala Estate (HGU on progress 419.9 Ha)	2024		-
		Sei Rokan Estate	2009		Certified
		Sei Rokan Estate (HGU on progress – 102.7 Ha)	2024		-
		Sungai Tapung Plasma	2009		Certified
Ujung Tanjung Mill (PT Ivo Mas Tunggal)	2009	Ujung Tanjung Estate	2009	Riau Province	Certified
		Kandis Sejahtera KKPA	2023		-
		Swadaya Mas Bersama KKPA	2023		-
		Ujung Tanjung Estate (HGU on progress – 557.3 Ha)	2022		-
	2010	Naga Mas Estate	2010	Riau Province	Certified

Naga Sakti Mill (PT Buana Wiralestari Mas)		Naga Mas Estate (HGU on process – 253.39 Ha)	2024		-
		Naga Sakti Estate	2010		Certified
		Naga Sakti Estate (HGU on process – 59.79 Ha)	2024		-
		Rama Bakti Estate	2010		Certified
Kijang Mill (PT Buana Wiralestari Mas)	2010	Kijang Estate	2010	Riau Province	Certified
		Kijang Estate (HGU on process – 56.07 Ha)	2024		-
		Kijang Kencana Plasma	2010		Certified
Ramarama Mill (PT Ramajaya Pramukti)	2010	Ramarama Estate	2010	Riau Province	Certified
		Ramarama Estate (HGU on process – 318.76 Ha)	2024		-
		Amartajaya Plasma	2010		Certified
		Berkat Ridho KKPA	2023		-
		Produsen Rama Sawit KKPA	2023		-
		Smallholder (Ramarama KKPA)	2024		-
Indrasakti Mill (PT Meganusa Inti Sawit)	2011	Indralestari Estate	2011	Riau Province	Certified
		Indrasakti Estate	2011		Certified
		Indragiri Plasma	2011		Certified
		Mandiri Jaya Plasma	2022		Certified* 2022
		Indrasakti Plasma	2011		Certified
Bumipalma Mill (PT Bumipalma Lestari Persada)	2012	Bumi Lestari Estate	2012	Riau Province	Certified
		Bumi Palma Estate	2012		Certified
		Bumi Sentosa Estate	2012		Certified
		Bumi Palma Estate (HGU on process – 39.21 Ha)	2024		-
		Kharisma Estate (PT Kharisma Riau Sentosa Prima)	2024		-
		Kharisma Plasma (PT Kharisma Riau Sentosa Prima)	2024		-
Sawita Mill (PT Sawitakarya Manunggul)	2023	Sawita Estate	2023	Kalimantan Selatan Province	ST-1
		Pamukan Estate	2023		ST-1
		Sawita KKPA	2024		ST-1
Kenari Mill (PT Bangun Nusa Mandiri)	2025	Gaharu Estate (PT Bangun Nusa Mandiri)	2025	Kalimantan Barat Province	-
		Kenari Estate (PT Bangun Nusa Mandiri)	2025		-

		Keranji Estate (PT Bangun Nusa Mandiri)	2025		-
		Smallholder (Gaharu Plasma)	2025		-
		Smallholder (Kenari Plasma)	2025		-
Sungai Air Jernih Mill (PT Bahana Karya Semesta)	2023	Sungai Air Jernih Estate	2023	Jambi Province	-
		Sungai Mentawak Estate	2023		-
		Sungai Mentawak KKPA	2023		
		Sungai Merak Estate	2023		-
		Sungai Badak Estate	2023		-
Sungai Perak Mill (PT Kruing Lestari Jaya)	2024	Sungai Perak Estate	2024	Kalimantan Timur Province	-
		Sungai Basung Estate	2024		-
		Sungai Pikan Estate	2024		
		Sungai Pilos Estate	2024		-
		Sungai Pikan Plasma	2024		
Sungai Kedang Mill (PT Harapan Rimba Raya)	2024	Sungai Kedang Estate	2024	Kalimantan Timur Province	-
		Sungai Tohan Estate	2024		-
		Kedang Pahu Estate	2024		-
		Sungai Pahu Estate (PT Rimba Rayatama Jaya)	2024		-
		Sungai Tohan Plasma	2024		
		Sungai Pahu Plasma (PT Rimba Rayatama Jaya)	2024		
	TBP revised on 19 May 2022 and approved by RSPO on 14 June 2022				
	There is revision of timebound plan on 19 May 2022 made by Head of Operations Sustainability. There are justification for mills and estates that postpone, with explanation: <ul style="list-style-type: none">• Pandawa KKPA supply base of Muara Kandis Mill is postponed to 2024 due to the SHM process.• Tanjung Rusa KKPA supply base of Tanjung Kembiri Mill is postponed to 2024 due to the SHM process.• Tanjung Sawit Estate dan Tanjung Sawit KKPA (PT Palmindo Biliton Berjaya) are postponed to 2024 due to still in process for HGU and land rights (SHM)• Kasuari Mill and supply bases are postponed to 2023 due to still in process of EIA (AMDAL) revision and permit for hazardous waste warehouse• Pekawai Mill and supply bases are postponed to 2022 due to pandemic covid-19 so that on-site audit in 2021 cannot be implemented• Kayung KKPA supply base of Pekawai Mill are postponed to 2024 due to still in process for land rights (SHM).• Kenanga Estate (PT Cahaya Nusa Gemilang) dan Delima Estate (PT Kencana Graha Permai) are postponed to 2024 due to pandemic covid-19 so that on-site audit in 2021 cannot be implemented.• Kencana KKPA and Kenanga KKPA supply base of Kenanga Mill are postponed to 2024 due to still in process for land rights (SHM).• Perdana Mill and supply bases are postponed to 2025 due to still in process for HGU• Kuayan Mill and supply bases are postponed to 2025 due to still in process for HGU• Belian Mill and supply bases are postponed to 2022 due to pandemic covid-19 so that on-site audit in 2021 cannot be implemented.• Belian KKPA, Muara Tawang KKPA and Kapuas Hulu KKPA supply base of Belian Mill are postponed to 2024 due to still in process for land rights (SHM).				

- Sungai Kupang KKPA supply base of Sungai Kupang Mill are postponed to 2024 due to still in process for land rights (SHM).
- Sungai Kikim Mill and supply bases are postponed to 2022 due to still in process of EIA (AMDAL) revision.
- Tangar Mill and supply bases are postponed to 2025 due to still in process for HGU.
- Sungai Magalau Mill and supply bases and supply bases are postponed to 2023 due to still in process for HGU and RaCP (LUCA review).
- Jalemo Mill and supply bases are postponed to 2023 due to still in process for HGU and RaCP (LUCA review).
- Sako Mill and supply bases are postponed to 2025 due to still in process for HGU.
- Medang Sati Estate (PT Saya Kisma Usaha) supply base of Hanau Mill are postponed to 2025 due to still in process for HGU.
- Jak Luay KKPA and Bukit Subur KKPA supply base of Jak Luay Mill are postponed to 2023 due to still in process for land rights (SHM).
- Gunung Kombeng KKPA supply base of Gunung Kombeng Mill are postponed to 2023 due to still in process for land rights (SHM).
- Rantau Panjang KKPA supply base of Rantau Panjang Mill are postponed to 2023 due to still in process for land rights (SHM).
- Tiga Serumpun KKPA supply base of Pelakar Mill are postponed to 2024 due to still in process for land rights (SHM).
- Batang Gading Estate supply base of Langling Mill are postponed 2023 due to still in process for RaCP (LUCA review).
- Batang Gading KKPA supply base of Langling Mill are postponed to 2024 due to still in process for land rights (SHM).
- Kilis KKPA supply base of Sungai Bengkal Mill are postponed to 2024 due to still in process for land rights (SHM).
- Bukit Kapur Mill and supply bases are postponed to 2025 due to still in process for HGU.
- Rama-Rama KKPA are postponed to 2023 due to still in process for land rights (SHM).
- Sawita Mill and supply bases are postponed to 2022 due to still in process for HGU.
- Sawita KKPA supply base of Sawita Mill are postponed to 2024 due to still in process for land rights (SHM).
- Kenari Mill and supply bases are postponed to 2025 due to the process for RaCP (LUCA review).
- Sungai Air Jernih Mill and supply bases are postponed to 2023 due to still in process for legality documents.

Then there are additional units in 2022 with the acquisition by GAR of 2 mills and 16 Estates (11 own estates and 5 plasma/KKPA) and have been included in the timebound plan to be certified in 2023, with the following details:

- PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA.
- PT Harapan Rimba Raya: Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA.
- PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA which will be supply base for Sungai Kedang Mill (PT Harapan Rimba Raya).
- PT Agrolestari Subur Sejahtera (previously the company name is PT Bumi Permai Surya Lestari): Bukit Permai Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified.
- PT Agrolestari Hijau Sentosa (previously the company name is PT Bumi Bangka Lestari): Bukit Lestari Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified.
- PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be supply base for Bumipalma Mill (PT Bumipalma Lestari Persada) which has been certified.
- PT Mitra Nusa Permata: Sungai Manunggul Estate which will be supply base for Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa).

In 2022, GAR has made additional units by acquiring 4 factories namely Sungai Perak Mill, Sungai Kedang Mill, Bukit Perak Mill, Bumi Palma Mill and 15 plantations (11 own plantations namely Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Pahu Estate, Bukit Permai Estate, Bukit Lestari Estate, Kharisma Estate and 4 plasma /KKPA namely Sungai Pikan Plasma, Sungai Tohan Plasma, Sungai Pahu Plasma, Kharisma Plasma).

	<p>There are some companies that are not fully certified, due to some area still on process to get land title (HGU) and RaCP process, consist of:</p> <ul style="list-style-type: none"> • PT Sawit Mas Sejahtera (Sawit Mas Estate) • PT Bumi Sawit Permai (Bumi Sawit Estate) • PT Djuanda Sawit Lestari (Muara Kandis Estate & Muara Tawas Estate). • PT Forestalestari Dwikarya (Tanjung Rusa Estate); • PT Sumber Indah Perkasa (Sungai Merah Estate and Sungai Buaya Estate). • PT SMART Tbk (Kinta Pura Estate) • PT Tapian Nadenggan (Long Buluh Estate and Bukit Subur Estate) • PT Ivomas Tunggal (Samsam Estate, Kandista Estate, Nenggala Estate, Sei Rokan Estate, Ujung Tanjung Estate); • PT Buana Wiralestari Mas (Nagasakti Estate; Nagamas Estate and Kijang Estate); • PT Rama Jaya Pramukti (Ramarama Estate); • PT Satya Kisma Usaha (Sungai Bengkal Estate, Kilis Estate and Sungai Bengkal KKPA) • PT Bumipalma Lestari Persada (Bumi Palma Estate) • PT Tapian Nadenggan (Sei Rindu Estate) • PT Kruing Lestari Jaya (Sungai Perak Mill and supply base), doesn't have land use title (HGU), the HGU is still on process
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard
	Jakluay Plasma and Bukit Subur Plasma will be certified in 2024 and have been included in the timebound plan.

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.2	<p>1. Rizliani Aprianita Hasibuan (Lead Auditor). Indonesian Citizen. Bachelor and Magister of Agribusiness, Faculty of Agriculture. She had followed training such as lead Auditor ISO 9001:2008, ISO 14001:2004, OHSAS 18001, ISPO Auditor training and followed several IHT related to environment, BMP etc. She has been involved in several audit activities related to sustainable palm oil certification since 2015 covering social aspect, health and safety aspect, worker welfare and waste management aspect. During the audit, she verified Legality, TBP, Partial certification, environment aspect, waste management, GHG and conservation.</p> <p>2. Asystasya Aishah Silalahi (Auditor). Indonesia Citizen, Bachelor of Economy, Major of Agribusiness, Faculty of Economic and Management. She has one year experience in consultancy. She has followed training such as ISPO Auditor Training, Lead Auditor ISO 9001:2015, OHS General Expert, RSPO lead auditor training course, SCCS, and several in house training related to environmental, BMP, SA 8000. Has been involved in several audit activities since 2016 related to sustainable palm oil certification covering waste management aspect, Social Aspect, Health and Safety Aspect, and Worker Welfare. During this audit, she verified social aspect and SCCS.</p> <p>3. Sentot Adi Subandono (Auditor). Indonesia citizen, Bachelor of Agriculture, Department of Agricultural Cultivation. He has five years of experience working since 2005 as Plantation Operational Staff and nine years as Internal Auditor in private oil palm plantations in Indonesia. The training that has been attended includes the Basic Management Development Program of Palm Oil Plantation, Use of Limited Pesticides, Best Practices in Internal Auditing, Fraud Auditing: Prevention, Detection, and Investigation, Operational Risk Approach in Internal Auditing, General Occupational Health and Safety Expert, ISPO Auditor Training in 2016, ISO 9001: 2015, RSPO Lead Auditor Training in 2021, and SMETA training awareness. During this assessment, verified the aspects of Best Management Practices, Transparencies and OHS Aspect.</p> <p>4. Alfiany Sukmawati (Auditor Trainee). Indonesian Citizen. Bachelor of Public Health, major in Environmental Health, University of Indonesia. Has experience working in as HSE specialist for 5 years. Has attended training in AMDAL A & B, ISO 14001 auditor training, OSHAS, ISPO by LPP, Lead Auditor ISO 9001:2015, Awareness ISO 17021, Awareness ISO 17065, Awareness ISO 9001, Awareness ISO 45001, and Awareness ISO 19011. Has participated in several simulations of audit activities related to the certification system for sustainable palm oil plantations with environmental aspects. During the audit, she verified environment aspect, waste management, GHG and conservation aspect under supervised by Lead Auditor.</p> <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1.2	<p>Number of auditors: 3 auditors and 1 auditor trainees</p> <p>Number of days for Onsite ASA 1.1: 5 days</p> <p>Number of working days for Onsite ASA 1.1: 15 Working days.</p>
2.2.2	Assessment Process
ASA-1.2	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Tapan Nadenggan – Jakluay POM to the requirements of based on:</p> <ul style="list-style-type: none"> • RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20th April 2020 • RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020 <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) video field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Some opportunities for improvement of the results ASA-1.2 delivered by the MUTU auditor to the management unit</p>

and the results are the subject will be verified at the next assessment phase ASA-1.3. Improvement of findings from RC findings were observed by auditors at this ASA-1.2 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.2.

The opening meeting was held on March 26th, 2023. As for the participants who attended the opening meeting included the Estate and Mill Managers, Regional Controller, Production Control, Support Team from Jakarta and other staff at PT Tapian Nadenggan while the closing meeting will take place on April 1st, 2023, attended by the same participants as the opening meeting. The auditee received the results of the audit conclusion recommendation from the auditor.

The assessment program please find Appendix 2.

2.2.3	Locations of Assessment
ASA-1.2	<p>The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>Jakluay POM</p> <ul style="list-style-type: none"> • Security Post. Interview with 1 security related to manpower aspect, emergency response, and OHS implementation in mill. • WTP. Observation about WTP condition and interview with worker related OHS implementation, worker welfare, and waste management. • Workshop. Observation and interview with workers related to workshop condition, manpower aspect, job responsibility, OHS implementation, hazardous waste management, and worker welfare. • Weighbridge Station. Interview with worker related to supply chain process, FFB source from certified and uncertified area, and worker welfare. • Chemical Storage. Observation related to OHS, environmental, and worker welfare aspects. • Spare part and PPE Storage. Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect. • Temporary Hazardous Waste Storage. Observation for OHS, waste disposal, and environmental aspects. • Empty Bunch Area. Observation related to implementation of procedures, OHS and environmental aspects. • WWTP. Field observations related to Ban to entry to WWTP, run off, testing of effluent. Officers equipped with PPE and Recording of effluent debit effluent. • Fuel and Oil Storage. Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect. • Solar Tank. Observations related to emergency response procedures, availability and condition of emergency response equipment and environmental management. • Grading Station. Observations and interviews related to work procedures, anti-bribery practices, employment, grievance mechanisms; and OHS aspects. • Sterilizer Station. Observations related to work procedures and OHS aspects. • Tipler Station. Observations related to work procedures and OHS aspects. • Press Station. Observations and interviews regarding work procedures, housekeeping, employment, complaint mechanisms, and OHS aspects. • Kernel Station. Observations and interviews related to work procedures, environmental management, employment, complaint mechanisms and OHS aspects. • Engine Room Station. Observations and interviews related to work procedures, environmental management, employment, complaint mechanisms and OHS aspects. • Boiler Stations. Observations and interviews related to work procedures, environmental management, employment, complaint mechanisms and OHS aspects. • Simulation of Hydrant area storage tanks. Field observations and interviews regarding the readiness of emergency response equipment.

Jakluay Estate

- **Fire monitoring tower, Block C19.** Observation related infrastructure for forest and land fires.
- **HGU pole No. 138, 139, 140.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **Landfill block B23.** Observation related to domestic waste management
- **Riparian of Pantun River block C25.** Observations related HCV management.
- **Sparepart and PPE Storage.** Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.
- **Fuel and Oil Storage.** Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.
- **Temporary Hazardous Waste Storage.** Observation for OHS, waste disposal, and environmental aspects.
- **Agrochemical Storage** Observation and interview with worker related to chemical management, OHS, and environmental aspect.
- **Workshop.** Observation and interview with worker related to workshop activity, OHS, environmental and worker welfare aspect.
- **Solar Tank.** Observations related to emergency response procedures, availability and condition of emergency response equipment and environmental management.
- **Housing Pondok 1.** Observation related to availability of infrastructure such as employee housing facilities, water facilities, educational facilities, religious facilities, health facilities and sports facilities
- **Daycare.** Observation related to facility, OHS and worker welfare aspects.
- **Rinse House.** Observation and interview related work procedure, employment, safety, and environmental aspect
- **Circle Path Spraying, Blok A21 Division 1 using Roll up and erkafuron.** Field observations and interviews related to aspects of Employment, OHS, Environment, social, and BMP.
- **Beneficial Plants, *Turnera ulmivolia* and *Antigonon leptosus*, Block A23/24 Division 1.** Field observations related to IPM implementation.
- **Owl Box Block A23 Division 1.** Observation of the condition of the owl cage and the application of biological IPM.
- **Land Application, Block C21 Division 1.** Observations and interviews with company representatives for land application at a dose of 375 m3/year and environmental aspects.
- **Mechanical emptying application using Erreppi Buffalo brand and Block C14 grabber.** Observations and interviews with workers regarding the application of empty fruit bunches at a dose of 30 tons/ha/year, labor aspects, and environmental aspects.
- **Mechanical road repair using Loader, Block C14.** Observations and interviews about work techniques, OHS aspects, and employment aspects.
- **Harvest Block H13 Division 5.** Observations and interviews related to aspects of employment, OHS, social, and BMP.
- **Activities of loosefruit collection Block B27 Division 1.** Field observations and interviews related to aspects of employment, OHS and BMP.

Pantun Mas Estate

- **HGU Stake No. TN 002, TN 001, TN 152.** Observations regarding the conditions of the stakes and boundaries of the HGU. It borders JLYA.
- **Riparian River of Pantun River, Block C29 Division 2.** Observation related to HCV management.
- **Fertilizer storage.** Observation and interview with storage keeper about job responsibility, fertilizer stock, OHS implementation, MSDS, and hazardous waste management.
- **General storage.** Observation about PPE stock and other material in the storage.
- **Oil storage.** Observation about oil stock, OHS implementation, and MSDS.
- **Agrochemical storage.** Observation about agrochemical stock, OHS implementation, MSDS, and hazardous waste management and interview with storage keeper about worker welfare, OHS implementation, and facilities for worker.
- **Rinse house and PPE storage.** Observation about waste management and OHS implementation.

- **Hazardous waste storage.** Observation about hazardous waste kept in storage, emergency response, and hazardous waste management.
- **Solar tank.** Observation about emergency response and secondary containment.
- **Material storage.** Observation related to PPE stock and other material kept in storage.
- **Weed Spraying, Block B31 Division 5** using Garlon mix and agristik. Field observations and interviews related to aspects of Employment, OHS, Environment, social, and BMP.
- **Landfill, Block B21 Division 5.** Observations and interviews regarding the technical management of domestic waste disposal by separating organic and inorganic.
- **Owl Box, Block B21 Division 5.** Observation of the condition of the owl cage and the application of biological IPM.
- **Beneficial Plants, *Turnera ulmivolia* and *Antigonon leptosus*, Block B36 and B38 Division 5.** Field observations related to IPM implementation.
- **Terrace area, Block C39 Division 6.** Observation on the management of undulating areas by making terraces and planting LCC.
- **Harvesting activities for Block C42 Division 6.** Field observations and interviews related to aspects of employment, OHS, social, environment, and BMP.
- **FFB Loading Activities, Block C42 Division 6.** Field observations and interviews with SJA FFB transport contractor workers, regarding technical aspects of work and aspects of employment.
- **Division 3 Housing (Division 3 Pondok).** Observations and interviews about housing conditions, sanitation, OHS aspects, public facilities, and the environment.
- **Child Care Center in Pondok 3 Housing.** Observations and interviews about the condition of the Child Care Center, OSH, employment, social and environmental aspects.
- **Fire Tower Block A39 Division 6.** Observation of fire monitoring infrastructure.

Long Buluh Estate

- **Spraying, Block F28, Division 2.** Observations and interviews related work procedure, safety aspect, worker welfare, and environment aspect.
- **Harvesting Block G31.** Observations and interviews related work procedure, safety aspect, and worker welfare aspect.
- **Harvesting, Block H19.** Observations and interviews related work procedure, safety aspect, and worker welfare aspect.
- **Riparian of Pantun River block H19.** Observations related HCV management.
- **HGU pole No. 109,103 and 97.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **Housing Pondok 2.** Observation related to availability of infrastructure such as employee housing facilities, water facilities, educational facilities, religious facilities, health facilities and sports facilities
- **Daycare.** Observation related to facility, OHS and worker welfare aspects.
- **Sparepart and PPE Storage.** Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.
- **Agrochemical Storage** Observation and interview with worker related to chemical management, OHS, and environmental aspect.
- **Fuel and Oil Storage.** Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.
- **Generator House.** Observation and interview with worker related work procedure, OHS, environmental and worker welfare aspect.
- **Solar Tank.** Observations related to emergency response procedures, availability and condition of emergency response equipment and environmental management.
- **Workshop.** Observation and interview with worker related to workshop activity, OHS, environmental and worker welfare aspect.
- **Firefighting Equipment Storage.** Observation and interview with worker related to hazardous waste management, OHS, and environmental aspects
- **Fire Drill.** Observation related emergency preparedness, facility, and fire emergency team.
- **Landfill Area.** Observation of domestic waste management.

- **Temporary Hazardous Waste Storage.** Observation for OHS, waste disposal, and environmental aspects.

Bukit Subur Estate

- **HGU stake No. TN 051, TN 052, TN 053.** Observations regarding the conditions of the stakes and boundaries of the HGU
- **Riparian river of Kernyanyan River, Block J13 Division 2.** Observation related to HCV management.
- **Mixing Area.** Observation and interview related work procedure, employment, safety, and environmental aspect.
- **Sparepart and PPE Storage.** Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.
- **Agrochemical Storage** Observation and interview with worker related to chemical management, OHS, and environmental aspect.
- **Workshop.** Observation and interview with worker related to workshop activity, OHS, environmental and worker welfare aspect.
- **Fuel and Oil Storage.** Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.
- **Temporary Hazardous Waste Storage.** Observation for OHS, waste disposal, and environmental aspects.
- **Agrochemical Storage** Observation and interview with worker related to chemical management, OHS, and environmental aspect.
- **Solar Tank.** Observations related to emergency response procedures, availability and condition of emergency response equipment and environmental management.
- **Firefighting Equipment Storage.** Observation and interview with worker related to hazardous waste management, OHS, and environmental aspects.
- **Housing Pondok 3 (Division 5).** Observation related to availability of infrastructure such as employee housing facilities, water facilities, educational facilities, religious facilities, health facilities and sports facilities
- **Rinse House.** Observation and interview related work procedure, employment, safety, and environmental aspect.
- **Road maintenance, Block D13 Division 1.** Field observations and interviews regarding technical work, employment aspects, OHS, social and environment.
- **Circle path Block E13 Division 1 using Roll up and erkafuron.** Field observations and interviews related to aspects of Employment, OHS, Environment, social, and BMP.
- **Harvesting activities for Block D14 Division 1.** Field observations and interviews related to aspects of employment, OHS, and BMP.
- **Beneficial Plants, *Turnera ulmivolia* and *Antigonon leptosus*, Block E/D 16 and 18 Division.** Field observations related to the implementation of IPM.
- **Owl Box Block E17 Division 1.** Observation of the condition of the owl cage and the application of biological IPM.
- **FFB Loading Activities, Block D13/14 Division 1.** Field observations and interviews with workers of the FFB transport contractor SJA, regarding the technical aspects of work and aspects of employment.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1.2	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Tapan Nadenggan was held by:</p> <ul style="list-style-type: none"> • Public consultations on PT Mutuagung Lestari Website on 13 March 2023 • Public consultation by email with NGOs such as WALHI, WWF, and Sawit Watch on March, 21 2023. • Public consultation by phone with government institution on March, 28 2023. • Public consultation by phone with communities including previous land owner on March, 28 2023. • Public consultation by phone with internal stakeholders and contractor on March, 28 2023. <p>Numbers of input from stakeholders were clarified by PT Tapan Nadenggan.</p>
2.3.2	Stakeholder contacted

Please find appendix 1

2.4	Determining Next Assessment
	The next visit ASA-1.3 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 assessed Jakluay POM – PT Tapian Nadenggan subsidiary of GAR Ltd. operation consisting of one (1) mill and four (4) oil palm estates.

During the assessment, there were one (1) Nonconformity were assigned against Major Compliance Indicators, and four (4) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective action(s) that had been reviewed and accepted by Auditor(s) in form of documentation evidence(s) e.g. (document record/photographic/etc). Those corrective action(s) taken that consist of one (1) Major non-conformity had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Jakluay POM – PT Tapian Nadenggan subsidiary of GAR Ltd. complied with the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1	The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1	<p>The company already has a list of information/documents that can be accessed by stakeholders such as government agencies and NGOs presented in document number F/SMART/UMUM/SADV/004/003 which was updated as of 15 June 2021. The document contains of 16 types of documents, including the following:</p> <ul style="list-style-type: none"> • Number of employees and list of basic wages of employees • List of NPWP and PBB • Payment of local taxes/levies • Environmental documents • Deed of establishment and amendment, • Production area data and fertilization application data • Evidence of land ownership • HCV identification report • SIA identification report • Community empowerment program report • OHS Team report • Continuous improvement program document • Human Rights Policy • RSPO audit report documents • Complaint and dissatisfaction handling documents • Negotiation procedures 	

Socialization regarding the list of publicly available documents was carried out on January 10, 2022 which was attended by company staff, representatives of internal and external stakeholders.

1.1.2

Company provides information for stakeholders in form of mandatory report and submitted to relevant stakeholders, for example:

- Report of HGU Utilization in 2022 PT Tapian Nadenggan submitted to Land National Office of Kutai Timur Regency on 20 February 2023.
- Report on the progress of the plantation business for Quarter IV 2022 PT Tapian Nadenggan submitted to Plantation Agency of Kutai Timur Regency on 20 February 2023
- Investment Activity Report for the 3rd quarter of 2022 which was submitted to the Ministry of Investment/BKPM by online on 24 November 2022
- OHS Organization JLYM - Quarterly Report 4 of 2022 reported to the Manpower and Transmigration Office of Kalimantan Timur Province on 17 January 2023.
- OHS Organization LBLE - Quarterly Report 4 of 2022 reported to the Manpower and Transmigration Office of Kalimantan Timur Province on 23 January 2023.
- OHS Organization JLYE - Quarterly Report 4 of 2022 reported to the Manpower and Transmigration Office of Kalimantan Timur Province on 10 January 2023.
- OHS Organization BSRE - Quarterly Report 4 of 2022 reported to the Manpower and Transmigration Office of Kalimantan Timur Province on 30 December 2023.
- OHS Organization PMSE - Quarterly Report 4 of 2022 reported to the Manpower and Transmigration Office of Kalimantan Timur Province on January 2023.

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

1.1.3

Records regarding requests for information and responses for each unit listed in the Document Request and Response Information Document with No. F/SMART/GENERAL/SADV/004/002. The document informs the letter number, date of letter, and the information needed. For example, the Bukit Subur Estate shows an Incoming letter from the Long Noran Church dated March 6, 2023 regarding a request for assistance with a dump truck unit. The company responded to the letter by providing dump truck unit assistance on March 7, 2023.

Based on interviews with representatives of the Kenyanyan Village community and related offices in East Kutai Regency, it is known that stakeholders have never asked for information from the company.

1.1.4

The company has SOP for Communication and Consultation with stakeholders in document No. SOP/SMART/GENERAL/SADV/II/004 which was signed on 1 July 2014 by the Sustainability Division Head. Requests for information will be selected and classified by the Unit Head. The time for submitting information from the Unit Head to each department is less than 1 week and must be responded to immediately or less than 3 weeks from the date of receipt. Monitoring requests for information, responses and preparation of documents is carried out by a social official who has been appointed in each estate and mill unit. Based on interviews with representatives of Kenyanyan and Sri Pantun Village, it is known that stakeholders have understood the mechanism for communicating and consulting with the company.

1.1.5

The company has shown a list of stakeholders for 2023 which includes stakeholder names, contact information, addresses, telephone numbers, and descriptions. The listed stakeholders consist of statutory body, indigenous peoples, local communities, workers' organizations, smallholders, independent FFB and service suppliers, and NGOs.

The following is a summary of the contents of the document:

- statutory body: 11, consisting of government agencies (Provincial/District government agencies).

- Local Communities: 43, consisting of community leaders, traditional leaders, religious leaders and village government.
- Workers' Organizations: 10, consisting of Trade Unions, Gender Committees and Employee Cooperatives.
- FFB suppliers and service contractors: 15, consisting of 13 FFB suppliers and 2 service contractors (FFB transport and road paving).
- Local NGO: 1 NGO

Based on the stakeholder list document, it is known that these contacts can be contacted through interviews with representatives of internal and external stakeholders, for example an interview with the Office of Manpower and Transmigration of East Kutai Regency.

Status: Comply

1.2

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

1.2.1

The Company has a Policy on Business Ethics Principles dated January 29, 2022. The policy explains:

- The company does not tolerate any acts or forms of corruption in business practices
- The company is committed to standards of ethical behavior in the management of all business practices
- The company recognizes, practices and promotes Good Corporate Governance.

The company has conducted socialization related to company policies such as Business ethics Policy, Human Rights and others. For example:

- Socialization on January 17, 2023 attended by 45 workers
- Socialization on February 8, 2023 attended by 73 workers

The results of interviews with stakeholders such as workers and contractor, known that the company has provided socialization related to the company's ethical policies.

1.2.2

The system to monitor compliance with ethical policies is carried out through internal audit and monitoring complaints. From the results of the verification of the complaint document and interview with stakeholders known that there were no complaints related to violations of ethical behavior.

In addition, the company also routinely conducts internal audits every year covering aspects of the RSPO including ethical behavior. The RSPO internal audit conducted on 28 November – 3 December 2022. And from the results of the internal audit conducted, there is no indication of a violation of ethical behavior.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

2.1

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

2.1.1

The unit of certification can presented compliance against legal requirements as follows:

Compliance with Legal Aspect:

HGU

The company already has land ownership documents, including HGU and HGB for total area is **16.241,3679 Ha** and the total HGU area for smallholder cooperatives is 2,501.78 Ha. However, the total scope of the RSPO is 15,671.75 Ha. All HGU and HGB are still valid.

Following are brief details of Decree Letter of HGU and HGB.

HGU	
SK HGU No. 128/HGU/BPN RI/2009	11.503,48 Ha
SK HGU No. 57/HGU/KEM-ATR/BPN/2018	893,43 Ha
SK HGB No. 7/HGU/KEM-ATR/BPN/I/2022	3.834,1679 Ha
HGB	
SK HGB No. 164-550.2-44-2007	10,29 Ha
Total	16.241,3679 Ha

IUP

- IUP covering an area of \pm 1,300 Ha based on Decree Regent of Kutai Timur Regency No. 500/030/Eko.2-VI/2008 dated 23 June 2008
- IUP covering an area of \pm 11,703 Ha based on Decree Regent of Kutai Timur Regency No. 188.4.45/160/Eko.1-X/2012 dated 31 October 2012.
- IUP covering an area of \pm 6,683 Ha based on Decree Regent of Kutai Timur Regency No. 188.4.45/121/Eko.1-XII/2011 dated 26 December 2011
- IUP Processing covering mill capacity of 80 MT FFB/hour based on Decree Regent of Kutai Timur Regency No. 500/675/EKO.2-VIII/2009 dated 13 August 2009.

Compliance with Worker Welfare Regulations:

The determination of wages at Unit certification is based on the minimum wage in Kutai Timur District based on the Decree of the Governor of Kalimantan Timur No. 561/K.853/2022 on December 6, 2022. The Minimum Wage for Kutai Timur District in 2023 is Rp. 3,356,109.27.

Compliance with Environmental Regulations:

- Permit for water usage based on Decree of the *KepMen PUPR* No. 115/KTPS concerning Water Resources Concession Permits to Tapani Nadenggan Limited Liability Company for Industrial Business on January 10, 2023 with a validity period of 5 years.
- Permit for Utilization of POME for Land Application (LA) based on *DPMPPTSP* of East Kutai Regency Number. 503/03/DPMPPTSP-PPNP/L.A/II/2020
- Permit for Hazardous Storage in accordance with the Decree of the Head of *DPMPPTSP* of East Kutai Regency No.503/11/DPMPPTSP-PPNP/TPS-LB3/IX/2018
- UKL-UPL document for PT Tapani Nadenggan's oil palm plantation activities with the scope of the study refers to the District Head's Decree No. 525.5/K.169/2010 covering an area of 975 Ha. The environmental document has received approval from the East Kutai Regency AMDAL Commission with Number 660/617/3-BLH/V/2010 dated 14 May 2020.
- Environmental Impact Analysis (ANDAL) document for the planned development of an oil palm plantation of 6,683 Ha refers to the Decree of the East Kutai Regent No. 525/K.269/HKV/2011 dated 3 May 2011. The environmental document was approved by the East Kutai Regency AMDAL commission on 2 April 2012 with No. 660.5/K.216/2012

Compliance with Best Management Practice Regulation

- The CH has planted certified seeds.
- The management unit already owns and uses pesticides registered with the Pesticide Commission.
- IPM activities according to the best IPM guidelines.

Compliance with OHS Regulation

Certification unit in general has complied with OHS regulation, including:

- All units within the scope of certification have an OHS Committee that has been approved by the government. For example, the JLYM OHS Committee which was registered/approved by the Office of Manpower and Transmigration of the Province of East Kalimantan on January 16, 2023 (SK No. 566/0180/P2K3/PPK/DTKT/2023).
- Provision of PPE for free to all workers and arrange the use of PPE according to the type of work based on the free predetermined HIRAC.
- Have permits for all factory operating machines such as 3 steam separators machines that have been tested for eligibility according to applicable regulations (the last feasibility test was in December 2019 – valid for 4 years, carried

out by the Manpower and Transmigration Agency of Kalimantan Timur Province).

- Has a license / competency for some special jobs that require more expertise such as OHS experts, hiperkes, boiler operators, diesel engine operators, welder, wheel loader operators and others in accordance with the requirements contained in the legislation. For example, a doctor's hiperkes certificate with the initials dr. SK issued by the Minister of Manpower and Transmigration, after attending training on 18 - 17 April 2013.
- Has carried out a general health check (Medical Check Up) every year until 2022 for all workers and special checks (cholinesterase, spirometry and audiometry) according to the level of risk / danger for certain jobs.

2.1.2

The certification unit has SOP to comply with regulations & other requirements (SOP/SMART/UMUM/SADV// 002, dated July 1, 2014). Regulatory updates are carried out at least once a year. The officers responsible for updating the list of regulations according to the SOP are: Identification of regulations at the national level by SADV and at the regional level by Regional SPO Officer and SPO Officer unit. The document describes the company's compliance with the regulations in force in the Republic of Indonesia, for example the fulfilment of the latest regulations such as the Decree of the Governor of Kalimantan Timur regarding the Provincial Minimum Wage for 2023.

2.1.3

The company has procedures for maintaining HGU markers as stated in document number SOP/SMART/CERS-EHSD/SADV//004 dated 1 July 2014. The procedure explains that maintenance of HGU boundary is carried out periodically every 3 months by monitoring and checking the physical condition of the boundary markers by an officer appointed by the estate manager.

The company shows documents monitoring HGU stakes which are carried out every 3 months for each plantation. For example, the last HGU monitoring was in March 2022 for the Pantun Mas Estate which informed that all stakes were in complete condition. In addition, based on field visits to HGU No. TN 051, 052 and 053 at Bukit Subur Estate and No. 002, 001 and 152 in Pantun Mas Estate, it is known that all stakes are in good condition and there are no indications of planting outside the HGU.

Status: Comply

2.2

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

2.2.1

The company already has a list of contractors included in the stakeholder list. The list of contractors includes all third parties working with PT Tapian Nadenggan such as hazardous waste transporter, FFB transporter and others. The list of stakeholders informs the name of the agency, contact name, field of cooperation and contact number.

2.2.2; 2.2.3

The company has shown examples of agreement letter and statement letter with third parties that have contained clauses regarding legal compliance obligations, such as Agreement Letter for FFB transporter No. 004/TPN/JKTO-III/XII/2019 - ATBS dated 2 December 2019 and valid until 31 December 2023.

In the agreements letter and its attachment, have been explained about obligation to compliance with regulation, such as :

- Comply with applicable labor regulations
- Provide PPE
- Involve workers in BPJS
- Do not employ underage workers and workers who come from human trafficking

The company also shows documentation of compliance with regulations by the contractor (PT SJA) which has 251 workers, such as:

- Evidence of BPJS employment payment for 251 workers for the February period paid on 6 March 2023
- Evidence of BPJS health payment for 251 workers for the March period which was paid on March 6, 2023

- Evidence of payment of wages for the period of February 2023 with initial NM and AA workers with wages above the 2023 East Kutai Regency minimum wage.

The company also showed contractor work evaluations for 2022 and 2023 which provide information on contractor compliance with regulations, such as personal protective equipment, social security for workers and others. Based on the results of an evaluation, for example for PT Maharani Sukses Abadi (excavator rental) that conducted on 7 February 2023 it is known that the quality of the contractor's performance is very good.

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

Status: Comply

2.3

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

2.3.1

Based on the document review, it is known that the company receives FFB directly and indirectly from several sources. Examples of direct FFB that were received were from the own estate, Jakluay smallholder, and Bukit Subur smallholder, and independent smallholder. Companies can show required documents such as information on the geolocation of FFB sources, land ownership certificates, and plasma cooperative licensing documents. As an example:

- Jakluay smallholder Cooperative (JLYA) with coordinates 116053'40.88" E and 0059'46.82"N, land ownership document is SHM, and Cooperative Legal document based on deed No. 237/BH/PAD/DKKT/III/2004.
- Pantun Jaya Cooperative with coordinates 116051'29.19" E and 0053'38.75", land ownership documents are SHM and SKT, and Cooperative Legal documents 318/BH/DKKT/XII/2004.

2.3.2

Based on document verification, it is known that the company also receives FFB indirectly from FFB suppliers such as agents, namely CV Mitra Telen Abadi. Companies can show geolocation information from farmers who send FFB to CV Mitra Telen Abadi, for example:

- A.n Dasi with a land area of 3 Ha with coordinate points 116051'51.492"E and 0044'27.058"N
- A.n Efendi with a land area of 21 Ha with coordinates 116051'11.934"E and 0048'8.833"N
- A.n Rambo with a land area of 3 Ha with coordinates 116051'54.603"E and 0044'2.023"N

The permit for CV Mitra Telen Abadi is NIB No 1226000502487.

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; 3.1.2

The CH has prepared a Management Plan in the PT Tapan Nadenggan Profitability document for 5 years (2023 – 2027) approved by Top Management which includes projected FFB production, CPO and PK production, CPO and PK revenues, CPO and PK production costs, CPO net income and PK, total Plantation Costs, total Factory Costs, management costs, Profit/Loss, and plasma. Example of projected FFB production in 2023: 351,213 tons, CPO 79,023 tons (22.5%), and PK 20,195 tons (5.75%). It is also known that there are no replanting plans for the next 5 years.

3.1.3

The CH has conducted regular management reviews. Included in the Management Review document conducted in March 2023. The record informs, among other things, the compliance audit report, customer feedback, as well as preventive and corrective actions according to the results of the internal audit.

The CH also conducts internal audits for all units of certification. As an example, the JLYM Internal Audit Report for September 19-26 2022 with a scope audit on material inventory is shown. Also shown was the VPA and CFO

Memorandum dated 14 February 2023 which contained comments for steps to improve the results of the Operation Internal Audit findings which were carried out at Jak Luay Estate in November 2022.

Status: Comply

3.2

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

3.2.1

The CH has demonstrated evidence of implementing an action plan for continuous improvement. In ensuring the implementation of sustainability in all aspects of the company, the company presents regular RSPO internal audit reports. The last internal audit was carried out on 28 November – 03 December 2022 with no discrepancies as a result.

In the BMP aspect, The CH has used mechanization in the EFB application, namely the Erreppi heavy equipment. Erreppi is run by 1 Operator, with the work of transporting EFB from Collection Road brought into the block.

3.2.2

The company has shown the auditor regarding the RSPO metric template Version 2.1 for the period of 2022 that has been filled in according to the facts and data in the company's record documents. Based on the team auditor's review, the information has been matched with other documents, total planted area, demographic workers, HCV area, FFB productions, work accidents, etc.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The CH has SOPs and work instructions for all plantation activities that are collected in the MCAR (Management Committee Agronomy and Research) update for 2020. These work instructions/SOPs cover all plantation activities from land clearing, nursery practices, oil palm planting, LCC planting, maintenance and fertilization, pest and disease control, fruit harvesting to delivery to the factory.

The CH also has SOPs and factory work instructions that are collected in the MCMD (Management Committee Mill Development). The Procedures and Work Instructions contain all procedures at the factory from receipt to delivery of CPO & PKO as well as the quality of the production produced.

Based on field observations at JLYM, JLYE, PMSE, LBLE, and BSRE it is known that procedures have been implemented in every operational work.

3.3.2; 3.3.3

The CH already has a system that guarantees the consistency of the implementation of procedures contained in the Internal Audit procedure Number SOP/SMART/UMUM/SADV/I/009 dated December 5, 2012. The company routinely carries out inspections of plantation and mill operations, for example it has been shown:

- Action Plan Audit Finding JLYM semester 2 of 2022 September 19-26 2022 with a scope audit on material inventory.
- LBLE internal audit report for semester 2 of 2022 dated December 12, 2022 with the scope of examining plant production.

The system ensures consistency in implementing procedures by carrying out Detailed Harvest Inspection by the Harvest Foreman and routine FFB grading at collection points by the Harvest Clerk when transporting FFB. for example, it has been shown:

- Field Inspection Control Document Block C42 PMSE dated 29 March 2023 using the e-FACT (electronic Field Activity Capture Treacibility) application. This document is made by the Harvest Foreman and Assistant.
- Recap of the BSRE Grading for the period 01 - 31 March 2023 carried out by Kerani Harvest, with a total yield of FFB 182,463, 99.71% ripe, 0.02% underripe, 0.03% unripe, 0.11% overripe, digitally using the e-FACT system.

Observations at JLYM also found that FFB was transported by SJA contractors. Every DT Operator (Dump Truck) must use PPE such as safety helmet and safety shoes, if not wearing PPE, DT is prohibited from entering POM. The result of the observation is that all DT operators have used the appropriate PPE.

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

There is no new land development carried out by the company. The scope of certification is still the same as the previous assessment. The certification unit has several documents related to social and environmental impact assessments which are carried out independently and in a participatory manner, involving affected stakeholders. The document covers the pre-construction activities, the operation stage, and the post-operation stage. Some of the documents held by the certification unit include:

Environmental Aspect

AMDAL for Jakluay POM, Jakluay Estate, Long Buluh Estate, Pantun Mas Estate.

- Addendum to ANDAL, RKL & RPL in 2012 with the scope of referring to SK HGU No. 128/HGU/BNP RI/2009 with an area of 11,503.48 Ha (JLYE, PMSE, LBLE). Some of the addendums made include changing the production capacity of POM from 60 tons of FFB/hour to 80 tons of FFB/hour and the construction of an airstrip. ANDAL Addendum Has been approved by the Kutai Timur District AMDAL Commission on April 22, 2013.
- The documents that have been obtained have obtained the environmental feasibility of adding an oil palm plantation to increase production capacity from 60 tons of FFB/hour to 80 tons of FFB/hour and an Airstrip i development plan with a total area of 11,503.48 Ha in accordance with the Decree of the Kutai Timur Regent Number: 662 /K.314/2013 dated April 22, 2013.
- Environmental Permit based on the decision of the Regent of Kutai Timur Number: 662/K.312/2013 for activities to increase processing capacity from 60 tons of FFB/hour to 80 tons of FFB/hour and construction of a water strip with an area of 11,503.48 Ha in accordance with the decision of the Regent of Kutai Timur Number: 662/K.312/2013 dated April 22, 2013.
- Environmental Permit in accordance with the decision of the Head of the Investment and One Stop Service Office of Kutai Timur District number: 503/06/DPMPSTSP-PPNP/IL/VIII/2019 recommendation for changes to environmental permits for changes in environmental management and monitoring of oil palm plantations with an area of 11,503 ,48 Ha on August 5, 2019.

ANDAL Document for an area of 6,683 Ha (BSRE)

- The Environmental Impact Analysis (ANDAL) document for the planned activities for the development of oil palm plantations covering an area of 6,683 Ha refers to the Decree of the Regent of Kutai Timur No. 525/K.269/HKV/2011 dated 3 May 2011. The environmental document has been approved by the Kutai Timur District AMDAL commission on 2 April 2012 with No. 660.5/K.216/2012
- Environmental Documents have received SKKL No.660.5/K.216/2012 dated 2 April 2012 and Environmental Permit No.660/K.152/2013 dated 27 February 2013 from the Regent of Kutai Timur.

UKL-UPL Document for an area of 975 Ha (additional PMSE)

The UKL-UPL document for PT Tapan Nadenggan's oil palm plantation activities with the scope of the study refers to the Regent's Decree No. 525.5/K.169/2010 covering an area of 975 Ha. The environmental document has received approval from the Kutai Timur District AMDAL Commission Number 660/617/3-BLH/V/2010 dated May 14, 2020.

The company has identified the HCVs listed in the Report on the Identification & Analysis of the Existence of High Conservation Value Areas of PT Tapan Nadenggan Units Pantun Mas Estate, Jakluay Estate, Long Buluh Estate, Pantun Mas Plasma Estate, and Jakluay Plasma Estate which were carried out in 2013 by the Biodiversity & Conservation Section (Sustainability Division) PT SMART Tbk. The scope of the HCV Study being carried out is ±16,000 Ha (Location Permit). The total area of HCV included in the scope of certification is 339.75 Ha.

Social Aspect

PT. Tapian Nadenggan has shown the Social Impact Analysis document recorded in the "Social Impact Assessment of Palm Oil Plantations and Mills in Telen Sub District, Kutai Timur District, Kalimantan Timur Province", this assessment was carried out by the Internal Social Impact Analysis team in January 2014. During the Social Impact Analysis, the company held stakeholder meetings with the surrounding communities affected by the project, for example the public consultation on 12 March 2014 involving representatives from 8 villages and attended by 56 participants. Records of the meeting have been documented, such as:

- Documentation of the social impact assessment survey of PT. Tapian Nadenggan;
- Social impact analysis questionnaire, dated 18 June 2013. For example: Mr. Komang S, Mr. Warzin, etc.
- Attendance list for public and stakeholder consultations dated March 12, 2014 was attended by 56 participants, on March 11 2014 attended by 9 participants. Minutes of meetings with Stakeholders are available in the attached SIA document.

Based on document verification, it is known that the scope of the social and environmental impact assessment has covered all villages, farmers, and has involved internal workers as well as all operational areas of the company which are included in the scope of certification.

3.4.2**Environmental Impact Assessment (EIA)**

Based on the results of document verification, it can be concluded that all management and monitoring parameters requested in environmental documents have been implemented. Certification unit has also evaluated for each significant impact monitoring parameter that is implemented as required in KepmenLH 45 of 2005, which includes an evaluation of trends, evaluation of critical levels, and evaluation of compliance. Based on the results of the evaluation, it is known that all parameters are still appropriate by the related Quality Standards, and there is no indication of contamination.

The implementation of environmental management has been carried out in accordance with all RKL-RPL documents and Environmental Permits owned by the company based on attachment of the matrix. The environmental management and monitoring matrix describes the impact of plantation activities and mill operations, also explains the evaluation of the trend level, critical level evaluation and evaluation of compliance with the results of management and monitoring plan contained in the environmental permit document.

The environmental management report is carried out every 6 months and submitted to the relevant agency, for example can be proof with;

- Report on the Implementation of PT Tapian Nadenggan's Plantation and Factory Environmental Management and Monitoring Plan for Semester 2 of 2022 through SIMPEL to the East Kutai Regency Environmental Service, Kalimantan Provincial Environmental Service, and the Ministry of Environment and Forestry on February 11, 2023 with ID TTE: 1676109588-3608
- PT Tapian Nadenggan's UKL-UPL Implementation Report for the Pantun Mas plantation unit 975 Ha and Bukit Subur Estate 6,683 Ha for Semester 2 of 2022 period reported to the East Kutai Regency Environmental Service, the Kalimantan Provincial Environment Service, and the Ministry of Environment and Forestry on the 23rd December 2022.

Social Impact Assessment

PT Tapian Nadenggan already has a Social Impact Assessment management and monitoring plan which is still the same as the previous surveillance, for the 2021-2022 period which was prepared with affected parties such as villages around the company and workers. The preparation of the management plan is also based on the results of the previous year's SIA management plan review conducted in December 2020. The management plans for the 2021 and 2022 periods are as follows:

- The procedure for applying for assistance, the process of which is considered by the community to be relatively long, so that the CSR programs that have been carried out are felt to be less than optimal.
- Improving the local economy through the plasma partnership program.
- Employment

- Empowerment of local contractors and suppliers
- Community social assistance and local community customs.

Based on the results of interviews with the surrounding community, it is known that the impact of the existence of a company on village communities such as employment and CSR. The results of interviews with local farmers, namely the Pantun Jaya Cooperative, show that the social impact of the existence of a company is the development of plasma plantations which can improve the economy of farmers around the company. Based on document verification, the impacts from the interview results have been covered in the company's management plan.

3.4.3

Environmental Impact Assessment

The company has documents, the implementation of the results of the environmental permit including reports to agencies in the form of RKL-RPL documents which are conducted every semester and reported to related agency (explain in indicator 3.4.2).

The effectiveness of environmental management and monitoring can be seen from the results of environmental management and monitoring analysis, which can also be seen from the suitability between the management and monitoring plans and their implementation in the field, for example for the 2nd semester of 2022. Referring to KepmenLH 45 of 2005 concerning Reporting on the Implementation of Environmental Permits, which explains that in writing reports, there must be conformity in the description between the impacts being managed and the environmental components being monitored. In the documents shown, the presentation of the data still contains errors in describing actual and correct management and monitoring results, for example regarding the assessment unit, the latest regulatory references, and the monitoring period on measurement results. The company therefore has the opportunity to ensure proper writing (OFI).

Social Impact Assessment (SIA)

The company has managed and monitored social impacts in accordance with what has been stated in the Social Impact Monitoring Report year period of 2021-2022. In general, social impact management activities have been carried out with the aim of reducing the identified negative impacts.

Based on SIA monitoring, it is known that the unit of certification has implemented social management programs through the CSR programs that have been implemented in 2022 for social, health, infrastructure, and economic aspect.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1

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

Labor Recruitment

SOP No. KHI-smart/001-01 dated March 1, 2018 which explains, among other things:

- Done without distinction of race, caste, nationality, religion and others
- Not withhold formal identity documents from prospective workers
- Not accept prospective workers who are under 18 years old
- Not charge fees or security deposits to prospective workers
- Recruitment of workers based on need
- Receive workers in accordance with the requirements of the position / job
- etc

Promotion

SOP No. KHI-smart/010-00 dated August 1, 2017 which explains, among other things:

- Class promotion is based on the results of the work performance assessment
- Promotion is carried out in conjunction with the annual evaluation

Work Performance Assessment

SOP No. KHI-smart/009-00 dated August 1, 2017 which explains, among other things:

- Workers assessed are workers who have worked for at least 3 consecutive months
- The assessment period (evaluation) is January 1 to December 31
- Etc

In addition, the company also has Termination procedure No. KHI-smart/024-00 dated 2 January 2020 which discussed termination of employment due to resignation, reaching retirement age, committing serious mistakes, efficiency and others.

The system regarding human resources system available to their workers and representatives. The human resources system also in accordance with applicable regulations as well as for retirement and termination of employment has been described in collective labor agreement.

3.5.2

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

Unit Certification has shown a record of the implementation of employment procedures, for example:

- **Recruitment**

Company has been shown temporary agreement for upkeep work No. BSRE/PKWT/Div.3/01/2023 dated 20 January 2023 with initial AS

- **Promotion**

Company showed Appointment Letter from No. 002/LBLE-SK/IV/2023 dated March 30, 2023 with initial MM from temporary worker to permanent worker.

- **Pension**

The company showed a collective Agreement Letter No. 117/PT.TN-PB/I/2022 dated February 4, 2022 regarding Agreement Letter for terminating employment. In the agreement has been explained that the workers' rights have been paid by company

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

Status: Comply

3.6

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

3.6.1
Hazard Identification Risk Assessment and Control

HIRAC describes Activities, identification of potential hazards (source/event, impact), existing controls, initial risk analysis (level of likelihood, severity, level of risk). The identified activities cover all operational activities at the estate and mill, such as manual maintenance, chemical application, fertilizing, harvesting, transporting FFB, sorting FFB, and processing it into CPO and Kernel. Identification has also been carried out for supporting activities such as pest and disease monitoring, BOB (Barn Owl Box) monitoring, HCV monitoring, Tower of Fire, etc. The CH has also evaluated the Identification of Environmental Impact and Material Risk and OHS Analysis documents considering work accidents, the addition of new types of work or the use of new equipment/technology. And its became an OFI to ensure all activity has been cover ie census and LSU 9OFI).

OHS Program

OHS programs that have been implemented by The CH include monthly OHS Committee meetings, regular OHS Committee reports to the Manpower Office, safety inspections, periodic health checks, recording of work accidents, first aid inspections, PPE inspections, OHS training, emergency response simulations, socialization of SOPs, material handling toxic and dangerous, fire hazards, use of fire extinguishers, MSDS and symbols of hazardous materials and others.

The realization of the OHS plan

- Medical checkups are carried out by the company's clinic independently. MCU for all workers and workers with high risk has been implemented by the company. As an example, the results of the Cholinesterase examination on March 15-20 2023 for 60 JLYE workers who were exposed to chemicals were shown. It is known that there are 6 workers with results outside normal limits. Transfer letters have been shown for the 6 workers to jobs not exposed to chemicals, as a step in the recovery effort.
- Examination of OHS aspects, for example in the LBLE workshop area, as follows:
 - The results of the arm and hand vibration test, the whole body vibration is still below the allowable NAV (Threshold Value).
 - The results of the work environment noise test are still below the allowable NAV.
- Periodic inspection of PPE completeness, periodic inspection of fire extinguishers, periodic first aid kits including first aid bags. There are daily, weekly and monthly checks. The official in charge is the secretary of the K3 Committee.
- OHS Training and Socialization has been carried out in all business units, including:
 - Socialization on the use of PPE, HIRADC, OHS Policy, and GSEP at JLYM on 23 September 2022.
 - Socialization on the use of PPE, OHS Policy, and GSEP at LBLE on 17 January 2023.

3.6.2

The CH has conducted regular management reviews. Included in the Management Review document conducted in March 2023. The record informs, among other things, the compliance audit report, customer feedback, as well as preventive and corrective actions according to the results of the internal audit.

The CH also has an OHS Committee in each unit which is responsible for the implementation of OHS aspects. One of the activities of the OHS Committee is to conduct monthly evaluations regarding the implementation of the OHS program. For example, in the meeting on 06 December 2022 at JLYM which discussed, among others, the installation of cover conveyors and transmission/belt chains that did not yet have safeguards, as well as OHS reporting.

Based on this, companies are encouraged to ensure that the OHS Operator license extension process and OHS Operator license certification as follows:

OHS license extension that has expired

Based on the results of the review of OHS Operator License Monitoring documents, it is known as follows:

- 5 JLYE lift and lift operator OHS licenses that have expired for the period May and June 2022
- 5 BSRE lift and transport operator OHS licenses that have expired in June 2022
- 3 TLB, grader, compactor OHS operator licenses that have expired in May and July 2022

The company demonstrates the renewal process by showing communication records with the training section at the Head Office and PJK3 since April 2022, as well as showing a statement letter from PJK3 regarding the license extension process at the Ministry of Manpower of the Republic of Indonesia on March 27 2023. The process is quite long, due to process improvements from centralized implementation in the holding company to be local in the area.

Creation of a new K3 Operator license

As an effort to mechanize operational work, the company has added lift and transport aircraft. In addition, it is known that there are lift operators with OHS licenses who have resigned from the company. Based on this, to meet the requirements for an OHS operator license, the company showed a recording of an agreement for an OHS training institute with the initials IT dated March 28, 2023 regarding the plan to carry out OHS training and certification for lift and lift aircraft operators for 23 people, 3 prime movers, 3 class 2 boiler operators, etc.

Based on this, companies are encouraged to ensure that the OHS Operator license extension process and OHS Operator

license certification can progress positively. (OFI)

Status: Comply

3.7

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

3.7.1

The company showed the Training Program for each unit in 2023 that cover all aspects of the P&C RSPO. Based on interview with management, known that the training also covers parties who need training such as staff, workers, smallholder and others. As for sustainability and HR department are responsible for the development of the training program scheduling and implementation of training. The training program document informs type of training, plan / timetable and attendance. The 2023 training programs such as:

- Socialization of company policies
- Training of handling of hazardous waste and hazardous material
- Emergency response procedures training
- Firefighting technique training
- First aid training
- Training of harvesting
- Training of upkeep
- Training of spraying
- And others.

3.7.2.

The company already has training records, such as:

- First aid training on 13-14 March 2023 was attended by 26 participants
- Integrated pest management training on 9 March 2023. All documentation such as attendance list, photo and minutes of meeting has been attached.
- Training of handling of hazardous waste and hazardous material on 17 March 2023. All documentation such as attendance list, photo and minutes of meeting has been attached.
- Etc

As for some training records where appropriate on an individual basis.

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

3.7.3

Unit of certification shows the minutes of the SCCS training which was held on 12 February 2022 which was attended by 14 participants.

Based on interviews with weighbridge operators, it is known that operators have understood the supply chain flow at Jakluay Mill.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1, 3.8.2

Based on document verification, the Mill implements the MB Module, which is received both FFB from certified and

uncertified sources. Verification of Mass Balance record, the Mill has been recorded well the separation of FFB and products (CPO and PK) from certified and uncertified sources.

3.8.3

Estimated certified product recorded in the last Assessment Report and Certificate, and updated in the RSPO Palm Trace. Actual certified produced has been verified during this assessment. The estimates of certified production for the next license period also have been set, in reasonable amount taking into account the last year production. The data are shown in the following table:

Products	Last Year Projected + Ext Volume (14 August 2022 – 25 April 2023)	Actual (March 2022 – February 2023)	Estimated Production
FFB Certified (MT)	245,000	253,449.25	267,000
CSPO (MT)	54,000	52,969.69	58,800
CSPK (MT)	14,000	13,797.29	14,700

Based on table above, there is no overproduction of certified CSPO and CSPK.

3.8.4

The Mill has registered as RSPO member under GAR (No. 1-0096-11-000-00) and also has been registered in IT platform palm trace RSPO <https://palmtrace.rspo.org/web/rspo/member-directory> which information as follows:

- Member Name: Jakluay Palm Oil Mill - PT Tapan Nadenggan
- License ID: CB104463
- Core Product: Palm Oil
- Member ID: RSPO_PO1000001920
- Type of Business: Oil Mill
- Supply chain model: Mass Balance

All certified product sales have been registered through the RSPO IT system (palmtrace).

3.8.5

The Mill has had procedures related supply chain, such as SOP of RSPO Supply Chain Model of Mass Balance (No. PT.TN.JLYM/SOP/23 dated 16 January 2020), SOP of FFB Processing (No. SOP/SMART/MCMD/I/TM-PKS), SOP of Reporting of Certified Product (No. SOP-SMART/CERS-EHSD/SADV/003), and SOP of Document and Record Controlling (No. SOP/SMART/UMUM/SADV/I/001).

These procedures have referred to the latest RSPO Supply Chain System. The procedure has covered all aspects in SCCS MB model, such as receiving and recording that identify the traceability of RSPO certified and uncertified source and products, FFB processing, the announcement in RSPO Palm trace, key persons such as security, weight bridge clerk, dispatch/kernel officer, production clerk, Administration Head, as well as the training.

3.8.6

The latest audit internal conducted on 28 November – 3 December 2022. Based on internal audit, there is no nonconformity related to supply chain indicators. Company also has conducted management review related to sustainability and continuous improvement held on March 2023. The management review has covered the input from internal audit, correction and corrective action, process Performa and product compliance, follow up of previous management review, and recommendation for improvement.

3.8.7

The company has recorded FFB from certified and non-certified sources for the last 12 months. Following are details of receipt of FFB from certified and non-certified sources.

Month	FFB (ton)		Total
	Certified	Non-Certified	
March 2022	17,214.89	16,663.15	33,878.04
April 2022	18,009.47	22,271.05	40,280.52
May 2022	20,168.19	16,973.00	37,141.19
June 2022	25,873.75	21,276.95	47,150.70
July 2022	26,225.26	18,257.13	44,482.39
August 2022	27,035.67	18,510.07	45,545.74
September 2022	26,940.20	18,372.67	45,312.87
October 2022	22,826.00	17,251.23	40,077.23
November 2022	19,565.64	16,628.60	36,194.24
December 2022	22,232.46	14,895.43	37,127.89
January 2023	15,144.53	12,510.41	27,654.94
February 2023	12,213.19	9,981.36	22,194.55
Total	253,449.25	203,591.05	457,040.30

The company also shows the actual volume of certified products over the last 12 months, including:

Products	Last Year Projected (14 August 2022 – 25 April 2023)	Actual Production (March 2022 – February 2023)
CSPO (MT)	54,000	52,969.69
CSPK (MT)	14,000	13,797.29

Based on table above, there is no overproduction of certified CSPO and CSPK.

3.8.8

The company shows the record of sales of certified products contained in the Delivery Order document, weigh ticket, and delivery note. These documents include the name and address of the buyer and seller, RSPO certificate number, delivery date, product description, SCCS model, number of products shipped, unique identifier number. For example as follows.

- The name and address of the buyer (PT Sumber Indah Perkasa - Samarinda);
- The name and address of the seller (PT Tapan Nadenggan – Jakluay Mill in Muara Wahau)
- The loading or shipment / delivery date (18 Oktober 2022);
- A description of the product supply chain model (Mass Balance)
- The date on which the documents were issued (18 Oktober 2022);
- The quantity of the products delivered (14.24 ton);
- Any related transport documentation (transport by PT Satrindo Jaya Agropalma);
- RSPO certificate number (Mutu-RSPO/145);

Shipping announcement number of those selling document can be seen in indicator 3.8.16.

3.8.9, 3.8.10, 3.8.11

During the last 12 months, the company only sells certified PK. The delivery of the certified product is carried out by a transporter on behalf of PT Satrindo Jaya Agropalma and there were no additional contractors from the previous year. The company then showed the work agreement letter between the company and PT Satrindo Jaya Agropalma, namely agreement No 001/TN/12/2018-PK made on November 10 2020 with a work agreement validity period December 5 2020 – December 5 2024. Based on interviews with representatives PT Satrindo Jaya Agropalma, it is known that the contractor has understood the obligations towards supply chain standards and is willing to be accessed by CB.

3.8.12

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

Crude Palm Oil

Month	CPO Production (MT)		Total	CPO Delivery (MT)	
	Certified	Uncertified		Certified	Noncertified
Opening stock	860.84		860.84		
March 2022	3,484.88	3,437.56	6,922.44	0	3,661.82
Subtotal	4,345.72	3,437.56	7,783.28	0	3,661.82
April 2022	3,809.69	4,567.56	8,377.25	0	938.55
May 2022	3,591.54	3,290.55	6,882.09	0	1,343.30
June 2022	5,361.35	4,243.28	9,604.63	0	3,517.37
Subtotal	12,762.58	12,101.39	24,863.97	0	5,799.22
July 2022	5,678.77	3,775.23	9,454.00	0	5,527.01
August 2022	5,379.56	3,789.86	9,169.42	0	4,864.28
Sept 2022	5,424.03	3,777.63	9,201.66	0	4,479.33
Subtotal	16,482.36	11,342.72	27,825.08	0	14,870.62
Oct 2022	4,901.23	3,472.68	8,373.91	0	6,169.28
Nov 2022	4,108.65	3,457.04	7,565.69	0	7,784.12
Dec 2022	4,778.14	3,117.06	7,895.20	0	5,966.22
Subtotal	13,788.02	10,046.78	23,834.80	0	19,919.62
January 2023	3,045.53	2,558.27	5,603.80	0	1,701.76
February 2023	2,545.48	2,053.00	4,598.48	0	3,717.73
Subtotal	5,591.01	4,611.27	10,202.28	0	5,419.49
Grand Total	52,969.69	41,539.72	94,509.41	0	49,670.77

Based on table above, total CPO production is 94,875.47 Ton and there is no CPO sold as RSPO. As for CSPO sold as conventional, Jakluay POM has removed CSPO stock from palm trace. Further details regarding removing stock explained in 3.8.16.

Kernel Palm Oil

Month	PK Production (MT)		Total	PK Delivery (MT)	
	Certified	Uncertified		Certified	Noncertified
Opening stock	266.72				
March 2022	957.3	952.96	1,910.26	548.58	
Subtotal	1,224.02	952.96	2,176.98	548.58	
April 2022	1,024.76	1,243.43	2,268.19	1,312.96	
May 2022	1,003.10	922.34	1,925.44	734.15	
June 2022	1,420.28	1,134.24	2,554.52	729.83	
Subtotal	3,448.14	3,300.01	6,748.15	2,776.94	
July 2022	1,315.72	884.6	2,200.32	1,388.80	
August 2022	1,192.21	841.61	2,033.82	881.16	
Sept 2022	1,164.30	800.53	1,964.83	1,814.34	
Subtotal	3,672.23	2,526.74	6,198.97	4,084.30	
Oct 2022	1,306.03	945.67	2,251.70	1,111.28	
Nov 2022	1,152.48	981.12	2,133.60	1,594.53	
Dec 2022	1,291.70	849.91	2,141.61	861.22	

Subtotal	3,750.21	2,776.70	6,526.91	3,567.03	
January 2023	880.26	735.31	1,615.57	1,002.46	
February 2023	822.47	672.75	1,495.22	674.31	
Subtotal	1,702.73	1,408.06	3,110.79	1,676.77	
Grand Total	13,797.33	10,964.47	24,761.80	12,653.62	

Company also can show the record of supply chain document, for example weigh in ticket. Based on interview and observation in weighbridge station, it is known that operator can show the weigh in ticket from 2 years ago

3.8.13, 3.8.14

Mill has determined the extraction rate for CPO and PK to be produced. Based on actual production of CPO and PK for 12 months certificate period, the average extraction rate for CPO is 20.48% and PK is 5.36%. The Extraction rate for production projections will be update annually based on the actual production of CPO and PK.

3.8.15

The Mill only applying RSPO Supply Chain Module of Mass Balance.

3.8.16

Shipping announcement

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

- Shipping announcement No. TR TR-4feef799-f49f for CSPK MB for amount 200.39 MT. This contract has been shipped on 13 December 2022 based on Minutes of CPO Shipment No. PMM/CPO/IP/1222/024. Shipping announcement was created on 13 February 2023.
- Shipping announcement No. TR-b16b4efa-9882 for CSPK MB for amount 96.89 MT. This contract has been shipped on 11 – 18 October 2022 based on Minutes of PK Shipment. Shipping announcement was created on 28 October 2023

Removed Stock

Based on the mass balance document, there are conventional sales for CPO and PK. For conventional CSPO sales, the company has removed 28,000 tonnes of stock from Palmtrace. Meanwhile, for conventional CSPK sales, there is no remove stock from Palmtrace and will be removed at the end of the first quarter of 2023.

3.8.17

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

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

The company shows the Sinarmas Agri Business and Food Business and Human Rights Policy dated December 12, 2019 which states:

- Respect the rights and dignity of workers in accordance with legal provisions, provide fair treatment without discrimination and build harmonious industrial relations
- Respect the rights of workers in terms of freedom of opinion, collective bargaining as well as forming and joining labor unions.
- Prevent forced labor practices and not use workers resulting from human trafficking
- Ensure that no child labor is employed in all lines of operation
- Respect and protect the rights of whistleblowers and human rights defenders

The company has conducted socialization related to company policies including Human Rights policies for example :

- Socialization on January 17, 2023 attended by 45 workers
- Socialization on February 8, 2023 attended by 73 workers
- Socialization on March 7, 2023 attended by FFB supplier

Based on interviews with workers and contractor, it can be concluded that they understand human rights policies. Based on interview with stakeholder such as government agency, community around, representatives of labor union, and workers known that there is no indication of human rights violation.

4.1.2

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

Status: Comply

4.2

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

4.2.1; 4.2.2

The company has a Grievance and Conflict Handling procedure No. SOP/Smart/Sust/IV/003 revision 03 dated 14 February 2022. In the procedure it is explained that:

- Complaints can be submitted directly orally (for those who cannot read and write) or indirectly through the suggestion box
- Information and complaint data received by Social Officer / Head of administrative. The company guarantees the anonymity of whistleblowers and case whistleblowers with the aim of reducing the risk of retaliation
- Complaints can also be submitted via telephone, short message, email and others
- Initial response letter no later than 14 working days after the letter is received
- In terms of handling complaints, it is allowed to involve third parties

Company has showed socialization document related to grievance mechanism. For example :

- Socialization on January 17, 2023 attended by 45 workers
- Socialization on February 8, 2023 attended by 73 workers
- Socialization on March 7, 2023 attended by 2 FFB supplier
- Socialization on February 2, 2022 attended by 1 contractor
- Etc.

Based on interview with management known that for those who cannot read and write can be submitted directly orally or through third parties. In addition, if a collective settlement has not been reached, then a complaint can be submitted to the RSPO complaint system. The results of interviews with workers and labor union known that workers understand the grievance mechanism. Complaints can also be submitted to labor union. From the results of the interview, it was stated that workers' complaints were usually related to complaints about housing improvements and had been followed up by the company.

The results of interviews with contractor and village representatives indicated that stakeholder had understood the grievance mechanism. From the results of the interview, it was found that there were no complaints from contractor and communities around.

4.2.3

From the results of verification of the internal complaint logbook document, it is known that complaints from workers are only related to housing repairs. The following are some of the complaints:

- Complaints of full septic tanks submitted by workers in February 2022 with initial HD and have been responded by the company.

- Complaints of damage to the ceiling of the house on March 22, 2023 with initial ID and were responded by the company.

From the results of verification of the complaint logbook document, it is known that the grievances submitted by workers have been recorded by the company. However, not all response documentation in the form of the date of response or realization of housing improvement has been recorded by the company. In addition, realization of housing improvement document in the form of photo, also no information on the date of the response or the actual date of the repair of housing facilities. Related to this, companies have the opportunity to ensure documentation of responses to complaints submitted (OFI).

The results of interviews with workers, contractor and village representatives indicated that stakeholder had understood the grievance mechanism. From the results of the interview, it was found that there were no complaints from contractor and village representatives. And based on interview with workers known that complaints were usually related to complaints about housing improvements and had been followed up by the company.

4.2.4

The company has a Grievance and Conflict Handling procedure No. SOP/Smart/Sust/IV/003 revision 03 dated 14 February 2022. In the procedure it is explained that:

- Complaints can be submitted directly orally or indirectly through the suggestion box.
- Information and complaint data received by Social Officer / Head of administrative. The company guarantees the anonymity of whistleblowers and case whistleblowers with the aim of reducing the risk of retaliation
- Complaints can also be submitted via telephone, short message, email and others
- Initial response letter no later than 14 working days after the letter is received
- In terms of handling complaints, it is allowed to involve third parties

Based on interview with management known that for those who cannot read and write can be submitted directly orally or through third parties. In addition, if a collective settlement has not been reached, then a complaint can be submitted to the RSPO complaint system

The results of interviews with contractor and village representatives indicated that stakeholder had understood the grievance mechanism. From the results of the interview, it was found that there were no complaints from contractor and communities around.

Status: Comply

4.3

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

4.3.1

The company has developed a program to improve the welfare of the surrounding community which is listed in PT Tapan Nadenggan's 2023 CSR Activity Plan document. Based on interviews with representatives of Kernyanyan Village and Sri Pantun Village, it is known that the company has made visits to surrounding villages to discuss identifying social impacts which are one of the considerations in preparing CSR programs.

The following is an example of a CSR program for the 2023 period for each field.

- Economy: Local purchases and purchases of FFB Cooperatives and smallholders
- Infrastructure: heavy equipment assistance for village infrastructure
- Health: public health services
- Environment: tree planting
- Education: teacher salary assistance and scholarship assistance
- Social: disaster emergency response

Then, the company shows several CSR realization documents for 2022, for example:

- Mass circumcision assistance on 15 June 2022 which was held at the East Kutai Police
- Consumption assistance for the traditional activities of Long Segar Village which was carried out on April 19, 2022

- Assistance with diesel fuel for settlements in Long Segar Village on 13 November 2022
- Social fund assistance for the Erau event at Jakluay Village on April 18 2022

Status: Comply

4.4

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

4.4.1

The company already has land ownership documents, including HGU and HGB for total area is **16.241,3679 Ha** and the total HGU area for smallholder cooperatives is 2,501.78 Ha. However, the total scope of the RSPO is 15,671.75 Ha. All HGU and HGB are still valid.

Following are brief details of Decree Letter of HGU and HGB.

HGU	
SK HGU No. 128/HGU/BPN RI/2009	11.503,48 Ha
SK HGU No. 57/HGU/KEM-ATR/BPN/2018	893,43 Ha
SK HGB No. 7/HGU/KEM-ATR/BPN/I/2022	3.834,1679 Ha
HGB	
SK HGB No. 164-550.2-44-2007	10,29 Ha
Total	16.241,3679 Ha

IUP

- IUP covering an area of \pm 1,300 Ha based on Decree Regent of Kutai Timur Regency No. 500/030/Eko.2-VI/2008 dated 23 June 2008
- IUP covering an area of \pm 11,703 Ha based on Decree Regent of Kutai Timur Regency No. 188.4.45/160/Eko.1-X/2012 dated 31 October 2012.
- IUP covering an area of \pm 6,683 Ha based on Decree Regent of Kutai Timur Regency No. 188.4.45/121/Eko.1-XII/2011 dated 26 Desember 2011
- IUP Processing covering mill capacity of 80 MT FFB/hour based on Decree Regent of Kutai Timur Regency No. 500/675/EKO.2-VIII/2009 dated 13 August 2009.

4.4.2, 4.4.4

Based on public consultation with previous land owner and village representatives from Sri Pantun dan Kernyanyan Village, it is known that there was no customary right in or near the concession area of PT Tapan Nadenggan. All land acquisition between local people and company representatives conducted as mutual agreement and with Bahasa that understood by all parties involved. The compensation process is done directed to the land owner and not diminish the legal/customary right; landowners are given the freedom to release their land without coercion.

An example of a compensation document that has been carried out in the name of Lut Padan which is addressed in the village of Rantau Panjang, Telen Sub District, Kutai Timur District, with the area being compensated is 2 hectares, date of payment 3 December 2009:

- Mutual agreement and handover of planting and growing compensation signed between the company and Lut Padan and witnessed by the Head of Rantau Panjang Village, the Customary Head, the chairman of the Village Consultative Body, the head of *Rukun Tetangga* VI and acknowledged by the Head of Telen Sub-district
- Location plan of the land managed by Lut Padan, covering an area of 2 hectares in block G18 Jakluay Estate
- Receipt of payment of 7.8 million to Lut Padan
- Documentation in the form of photos of compensation fund submission.

The company also shows land acquisition documents for the BSRE area. The documentation shown included the collective agreement and handover of *tali asih* funds signed by the land owner and known to the Village Head, Traditional Head, and Dusun Head; land location sketch; as well as receipts for payment of compassion. The following is an example of a land acquisition document shown:

- Documentation of land acquisition on behalf of Supianto and Jon for an area of 7.87 Ha in Muara Pantun Village, Dusun Kenyanyan on 4 July 2009.
- Documentation of land acquisition in the name of Syahran, et al for an area of 32.81 Ha in Long Segar Village, Dusun Kenyanyan on 4 July 2009.

Based on the results of interviews with the previous land owner in Kenyanyan Village, the area that was acquired was previously for BSRE. The land acquisition process has been carried out through a process of negotiation and agreement between the two parties.

4.4.3

The company can show a map showing legal rights in the form of a HGU boundary map with a scale of 1: 30,000 contained in the HGU certificate issued by the Land Office. Based on public consultation with previous land owner and village representatives from Sri Pantun Village and Kernyanyan Village, it is recognized that they know the legal boundaries owned by PT Tapan Nadenggan.

4.4.5

Based on public consultation with previous land owner and village representatives from Sri Pantun dan Kernyanyan Village, it is known that there was no customary right in or near the concession area of PT Tapan Nadenggan. All land acquisition between local people and company representatives conducted as mutual agreement and with Bahasa that understood by all parties involved. The compensation process is done directed to the land owner and not diminish the legal/customary right; landowners are given the freedom to release their land without coercion.

4.4.6

Based on interviews with representatives of Kernyanyan and Sri Pantun Village who understand the process and agreement for land acquisition, it is known that the company has fulfilled the commitments and agreements submitted, such as development of smallholder, worker recruitment, and realization of CSR.

Status: Comply

4.5

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

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

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

Status: Comply

4.6

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

4.6.1, 4.6.2

The company has procedure of Land Compensation, document No. SOP/SMART/SENS-CSR/SADV/002 dated 1 July 2014 related to identifying legal, customary or user rights, and for identifying people entitled to compensation. Based on public consultation with previous land owner and village representatives from Sri Pantu Village and Kernyanyan Village known that they know about the procedure through the socialization given and they agree with the procedure.

Based on interviews with representatives of Kernyanyan and Sri Pantun Villlage, it is known that the land release process was preceded by socialization and then negotiations and after an agreement was reached, a compensation process would be carried out. The company also respects communities who do not want to relinquish land ownership rights. There was never intimidation and coercion in the whole process.

4.6.3, 4.6.4

Company also showed the example of land compensation as follows:

- Official Report of Field Checking and Physical Survey No. 012/590/18/2001/MW/III/2017 dated 20 February 2017 on area covers $\pm 20,000 \text{ m}^2$ (2.00 ha), where situated on Muara Wis Beringin Jaya Estate. Compensation agreed by both parties was IDR 20,000,000.- and had paid on 07 February 2018. The report acknowledge by government representatives.
- Official Report of Field Checking and Physical Survey No. 019/590/18/2001/MW/III/2017 dated 20 February 2017 on area covers $\pm 212,300 \text{ m}^2$ (1.23 ha), where situated on Dusun Tanjung Linung in Sub District of Muara Wis. Compensation agreed by both parties was IDR 12,300,000.- and had paid on 07 February 2018. The report acknowledge by government representatives.

Based on interview with representative of previous land owners of Benua Puhun and Loleng Village, it was known that process of compensation has been carried out smoothly, transparent, voluntary and fair through participative and FPIC approach. Process of compensation or acquisition has conducted through FPIC manners and did not diminish any legal rights and/or customary rights. Previous land owner also informs that the compensation process is carried out directly to the land owner and is given equal opportunity to both men and women, and land owners are given the freedom to release their land without coercion. Company has showed the list of compensation recipient and from list is known that the recipient consist of men and women.

Status: Comply

4.7

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

4.7.1, 4.7.2

Procedure of land compensation and identification of land owners is presented in document No. PMM/SOP/Umm-19 dated 01 January 2009. Procedure mentioned that unit of certification will conduct socialization on plantation operational activities, included planting of oil palm. During socialization, Land Verification Team will identify and looking information directly from village representative and cross check with the land owner. Measurement, land survey and mapping later on to be conducted by both parties, witnessed by village representatives and land owners of surrounding compensated objects. Final map as result of FPIC process will be used as reference for compensation calculation. Land owner has a right to reject the value of compensation.

Based on information from representative of Kernyanyan Village and Sri Pantun Village it was known that compensation process has conducted properly through fair and transparent approach, without any pressure from other parties. Furthermore, there is no issue related with land conflict and occupation within unit of certification operational areas.

4.7.3

Based on interviews with representatives of Kernyanyan Village and Sri Pantun Village who understand the process and agreement for land acquisition, it is known that the benefits obtained by people who have lost their land rights including road access, recruitment of workers from the surrounding village community, the realization of smallholder plantation, and realization of CSR programs as described in 4.3.1.

Status: Comply

4.8

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

4.8.1, 4.8.2, 4.8.3, 4.8.4

Based on area statement, there are occupational area in the unit of certifications. Those area is not in state of land dispute or land conflict. From interview with representative of management PT Tapian Nadenggan, occupational area are whose ownership is not willing to be relinquished to the company during the GRTT process so that the company does not force the community to relinquish their land rights and are categorized as enclaves. For the current condition, the company has mapped the area.

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION
5.1

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

5.1.1

Company has shown a document of FFB pricing determined by the company based on Agriculture and Plantation Service of East Kalimantan Province. The unit of certification also shows an example of payment for the February 2023 which is paid directly to the supplier's account according and this is according to the price that has been set.

The price of FFB is informed using the WhatsApp and telephone from the PIC every month.

5.1.2; 5.1.6

The company receives FFB supplies from the main estates, plasma plantations, independent plantations and FFB suppliers. Pricing for FFB from third parties is stated in the Sale and Purchase Agreement document. The company shows an example of FFB pricing for third party partners for the month of February 2023 issued by the Karya Baru Cooperative – Jak Luay Plasma. Based on this document, it is known that the FFB price for the period in February 2023 is Rp. 2347,-. Then it shows proof of payment of FFB yields from the plasma for the payment period on March 1, 2023 that the price paid to the plasma owner is in accordance with the applicable regulations.

5.1.3

The management unit has determined a fair price, for smallholder scheme farmers the prices are set in accordance with the plantation service price regulations. Meanwhile, the price for agents is set by the mill, and farmers have the freedom to sell to the mill they want.

Based on the results of interviews with Cooperative, it was conveyed that until now there has been no special premi, this is because no cooperative has yet taken part in a special certification that allows added value to the FFB produced. As for payments and pricing was done fairly.

5.1.4

Specifically for the agreement made with the Karya Baru Cooperative, the Chairman of the Cooperative said that the cooperative was given the freedom to determine the parties to assist in accordance with based on cooperative membership, including if there are women are involved.

5.1.5

The contract made is in accordance with applicable regulations, and transparently regulates all the necessary clauses starting from financing, payment systems, management systems and other matters, and has a validity period.

For example, letter of agreement between PT Tapan Nadenggan and Koperasi Sawit Prima Jaya dated 06 August 2005 with a valid until 05 August 2035 (for 30 years).

5.1.7

The results of document verifications it was known that the certification unit has routinely calibrated the weighing equipment carried out by UPTD Metrologi Legal Regional, there are:

- Certificate of Test Results No. 115/PKTN.4.3/SKHP/08/2022 Brand: Avery Weight Tronix which was carried out on 07 August 2023.
- Certificate of Test Results No. 114/PKTN.4.3/SKHP/08/2022 Brand: Avery Weight Tronix which was carried out on 08 August 2023.

The results of observations and interviews with weigh bridge operators obtained information that the certification unit has routinely performed the calibration of weighing equipment by third parties.

5.1.8

Management unit Support independent smallholders to be able to improve management including income and participation in certification. The support made can be seen in the GAR Social and Environmental Policy dated September 8 2015 at point 2.2.2 on the involvement of local farmers and entrepreneurs in sustainable supply chains. Up to now, the activities carried out are only at the stage of explaining and informing the RSPO certification to farmers. No special agreement has been made regarding SKI and ownership of certified products.

An example of socialization to independent smallholders or plasma cooperatives related to their participation in the RSPO certification program is shown in the RSPO socialization and understanding document on 28 May 2021 which was attended by representatives of plasma cooperatives (Harapan Jaya Sawit Cooperative, Karya Baru Cooperative, Serba Usaha Cooperative, Rantau Sejahtera Sawit Cooperative, Subur Abadi Palm Oil Cooperative, Prima Pantun Cooperative and Pantun Jaya Cooperative).

5.1.9

The unit of certification shows the SOP for Handling Complaints and Dissatisfaction with No. SOP / SMART / GIMS-SCMD / USDV / I / 001 issued date 1 July 2014 with the last revision 11 April 2017. In the SOP, it is explained that the Social Officer / KTU receives letters of complaint and dissatisfaction directly from the reporter or indirectly through the suggestion box. Information and data entered are recorded in the Complaint and Dissatisfaction Registration Form. Protection of whistle blowers is contained in the document, point 2.2.1 part a, which states that the Company guarantees the anonymity of whistle-blowers and whistle-blowers with the aim of reducing the risk of revenge.

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

Status: Comply

5.2

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

5.2.1

The Certification Unit has consulted with farmers, both out growers and smallholders. Consultation activities are carried out in conjunction with SIA management and monitoring activities. The results of the monitoring and review of the SIA management plan show that the needs needed by farmers are price certainty, access to quality official seeds, adequate road access and long-term contracts.

Based on the results of interviews with the Koperasi Sawit Prima Jaya, it is known that the Cooperative is currently still in the process of preparing farmers to take part in RSPO certification.

5.2.2

Based on the results of interviews with the Koperasi Sawit Prima Jaya it is known that the company has conducted socialization and training related to RSPO, HCV, Best Practice, etc.

5.2.3

The management unit has provided support to farmers to promote the legality of FFB production. As for examples of encouragement made related to ensuring that the source of FFB does not come from looted areas, does not come from forest areas, and already has land legality. The company has also collaborated with local farmers by providing certified superior seeds and receiving FFB from these farmers to ensure that FFB comes from superior seeds.

In addition, based on the results of interviews with the Koperasi Sawit Prima Jaya, it is known that currently the legality of farmer members of the cooperative is in the form of SHM and SKT.

5.2.4

Unit of certification can show recordings of training on IPM and the use of pesticides to plasma farmers, for example, recordings of training to the scheme smallholders unit which was held on 12 February 2022. The training materials include the implementation of a pest census and its control.

5.2.5

The management unit has conducted periodic reviews and made public reporting on the development of support to farmers on a regular basis which is carried out annually for all units under GAR. This can be seen in the GAR sustainability report which can be downloaded on the GAR website.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS
6.1
Any form of discrimination is prohibited.
6.1.1; 6.1.2

The company has a Sinarmas Agri Business and Food Business and Human Rights Policy which was set on 12 December 2019. The policy describes several commitments such as:

- Respect workers' rights and dignity in accordance with legal provisions, provide fair treatment without discrimination and build harmonious industrial relations.
- Respect workers' rights in terms of freedom of opinion, collective bargaining, and forming and joining labor unions.
- Ensure that child labor is not employed in all lines of operation.
- Preventing forced labor practices and not using workers resulting from human trafficking
- Etc

The company has conducted socialization related to company policies including nondiscrimination policies. For example :

- Socialization on January 17, 2023 attended by 45 workers
- Socialization on February 8, 2023 attended by 73 workers
- Socialization on March 7, 2023 attended by FFB supplier

Based on interview with representatives of labor union and workers, known that company has socialized company policies to the workers including nondiscrimination policy.

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

The results of the verification of employment documents, the results of interviews with workers and representatives of labor unions, it is known that the existing workforce in the company consists of permanent workers, temporary worker and daily workers who are recruited directly by the company without going through a third party, there is no retention of workers' documents and no recruitment fee.

6.1.3

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

Unit Certification has shown a record of the implementation of employment procedures, for example:

- **Recruitment**

Company has been shown temporary agreement for upkeep work No. BSRE/PKWT/Div.3/01/2023 dated 20 January 2023 with initial AS

- **Promotion**

Company showed Appointment Letter from No. 002/LBLE-SK/IV/2023 dated March 30, 2023 with initial MM from

temporary worker to permanent worker.

The results of interviews with workers and representatives of labor union revealed that labor procedures have been implemented by the company in accordance with applicable regulations. Based on that interview known that there is no discrimination against workers. As for the recruitment, employment, access to training, and promotions are carried out on the basis of skills, abilities and medical eligibility.

6.1.4

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

6.1.5

The company already has a gender committee that handles issues related to women or issues related to gender which also consist of female and male administrator. The structure of the gender committee consists of an advisor, coach, head, secretary and others. As for the name of women's committee head for example in BSRE with initial ES. The gender Committee also has work programs such as:

- Monitoring complaints, especially sexual harassment
- Implementation of *posyandu*
- Dissemination of complaints handling
- Etc

The results of interviews with the chair of the gender committee, interviews with women workers obtained information that there were no cases or complaints related to woman or gender issues such as sexual harassment or violence. From that interview also known that there are no complaint related to gender issues.

6.1.6

The determination of wages at Unit certification is based on the minimum wage in Kutai Timur District based on the Decree of the Governor of Kalimantan Timur No. 561/K.853/2022 on December 6, 2022. The Minimum Wage for Kutai Timur District in 2023 is Rp. 3,356,109.27. The company has shown Decree Letter the structure and scale of wages for 2023. Based on the letter on determining the structure and scale of wages, it is known that the lowest wage is the PT4T1 group with a basic wage of Rp. 3,281,609 and the highest wage is the PT 1A5 class of Rp. 3,658,109. The components of workers' wages consist of basic wages and workers' rice.

The results of interviews and the verification of workers' wages e.g loose fruit picker with worker ID 18183 and ID 18175 (worker with same work and same grade), it is known that the company has given the same wages for the same scope of work and in the same grade.

Status: Comply

6.2

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

6.2.1

The determination of wages at Unit certification is based on the minimum wage in Kutai Timur District based on the Decree of the Governor of Kalimantan Timur No. 561/K.853/2022 on December 6, 2022. The Minimum Wage for Kutai Timur District in 2023 is Rp. 3,356,109.27. Related to this, the company has Decree Letter related to wages, as follows :

- Decree Letter No. 031/CEO PSM 3/01/2023 dated 1 January 2023 regarding Temporary Worker Wages.
- Decree Letter No. 030/CEO PSM 3/01/2023 dated 1 January 2023 regarding Daily Worker Wages
- Decree Letter No. 029/CEO PSM 3/01/2023 dated 1 January 2023 regarding the structure and scale of wage 2023.

The company has shown Decree Letter the structure and scale of wages for 2023. Based on the letter on determining the structure and scale of wages, it is known that the lowest wage is the PT4T1 group with a basic wage of Rp. 3,281,609

and the highest wage is the PT 1A5 class of Rp. 3,658,109. The components of workers' wages consist of basic wages and workers' rice.

Based on interview with workers and labor union representatives known that company has paid wages in accordance with applicable regulation.

6.2.2

Company showed Collective Labor Agreement for 2022-2024 between *Serikat Pekerja Mandiri* (SPM) and PT Tapan Nadenggan. The company shows Decree Letter No. B-560/632/Disnakertrans-HIJ/III/2022 dated 7 April 2022 related to CLA Registration. The CLA has explained about working time, wages, overtime, leave etc. company has socialized Collective Labor Agreement to the workers. For example minutes of meeting on August 4, 2022 attended by 10 participants and minutes of meeting on May 17, 2022 attended by 13 participants

For contract workers/temporary work agreement (PKWT) and casual daily workers, are recruited directly by the company. The company also shows a temporary Work Agreement and casual daily work agreement. For example, temporary agreement for spraying activity with initial AS No. BSRE/PKWT/Div.3/01/2023 dated January 20, 2023 and valid until January 19, 2024. The agreement has explained work requirements such as working hours, wages, permits/leave and others. Example of casual daily work No. 003/LBLE/PKHL/01/2023 dated 1 January 2023 that has explained work requirements such as wages, BPJS etc. The company has also submitted the Work Agreement Report to the Manpower Office. For example, The Work Agreement Report submitted to the Manpower Office on February 21, 2023 for 13 workers.

The company shows list of the number of workers for the March 2023 as follows:

- BSRE : 483 workers
- LBLE : 507 workers
- JLYE : 674 workers
- PMSE : 707 workers
- JLYM : 146 workers

The auditor team has simulated the calculation of workers' wages by verifying payroll documents. For example for February 2023, for example factory workers with initial HSW (operator kernel) and plantation workers with initial HD (workshop). From the verification results, it is known that the company has paid wages according to the applicable regulations. In addition, the company also shows payroll documents that provide information related to compensation for all work performance. From interview with workers and labor union also known that company has socialized CLA to the workers.

6.2.3

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

- Payroll documentation that gives information on compensation for work performance. The results of the simulation of wages and overtime in February 2023, known that the company has paid overtime wages according to the workers' overtime hours and has complied with the applicable regulations. The simulation samples for overtime calculations for example:
 - For worker with initial HD and HSW. Based on wages simulation known that overtime wages has accordance with workers' overtime hours and has complied with applicable regulation
- Employee leave forms, such as:
 - Worker annual leave form with ID 19037 for 12 days that has been approved by management
 - Menstruation leave form of worker with initial MI for 1 day that has been approved by management
 - Maternity leave form of worker with initial OS for 3 months and has been approved by management
- Employee Attendance document every month which informs the number of attendances, leave, illness and others.

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

base/target but has worked for 7 hours, then the worker gets 1 working day's wages (worth the minimum wage per day).

Interview with labor union and workers, said that wages paid are in accordance with applicable regulations. Based on that interview and wages verification also known that deduction for workers such as BPJS deduction tax and has been described in the company regulation.

6.2.4

The results of field observations in housing areas and interviews with workers and labor union known that the company has provided housing facilities, infrastructure and facilities that are decent/in good condition to workers such as houses, clean water facilities, drinking water, religious facilities, sports, clinic and others. As for the housing facilities consist of 2 bed room and 1 bathroom. The condition of the house has good sanitation. From the interview and field observation at housing complex, also known that in each housing location there are child care areas, trash bins and others.

6.2.5

Based on the results of interviews with housing residents and workers, it was stated that workers had no difficulty obtaining sufficient food sources at competitive prices. There is an impromptu market every month after payday, itinerant vegetable vendors who enter the employee housing area. Beside that, there are also housing employees/dwellers who sell basic necessities in the housing area.

6.2.6

The determination of wages at Unit certification is based on the minimum wage in Kutai Timur District based on the Decree of the Governor of Kalimantan Timur No. 561/K.853/2022 on December 6, 2022. The Minimum Wage for Kutai Timur District in 2023 is Rp. 3,356,109.27. Related to this, the company has Memo No. 029/CEO PSM 3/01/2023 dated 1 January 2023 regarding the structure and scale of wage 2023.

In relation to Living Wage, the company has tried to do Prevailing Wage calculations for each unit, which included samples of In-Kind Benefits, such as Housing, water, electricity for home, medical facilities, school for workers children, etc. The smallest prevailing wage (2023) in position of casual daily worker with total Rp. 3,904,520. As for the calculation is based on actual and rational price at certification unit location. The calculations of prevailing wages refer to RSPO Guidance on Calculating Prevailing Wages (11 November 2019) which included in the calculation of main wage, worker status, housing facility, education, electricity, water sources, healthcare, and others

6.2.7

Based on the results of verification of the labor list document, interviews with labor unions and results of field observations it is known that there are PKWT workers (temporary workers) doing permanent jobs. This has become a non-compliance (NC 2022.01) during the previous assessment (surveillance 1.1). In this regard, the company conducted several follow-ups, including:

Monitoring program for contract harvesting workers (temporary worker agreement) to become permanent worker. The program also informs the realization of appointments from July 12 2022 to March/April 2023 with the following details:

Unit	Appointment of temporary workers at 12 July 2022	Appointment of temporary workers at 4 October 2022	Appointment of temporary workers at March/April 2023 (has been approved)	Temporary Workers Appointment in progress
JLYE	9	8	12	14
LBLE	30	16	21	18
BSRE	43	5	7	7
PMSE	28	11	14	6

As a result of interviews with management, information was obtained that there were harvest workers who had resigned/came out as of February 2023 with total 215 harvesting workers and company had shown several samples of harvester resignation letters. Due to the large number of harvest workers who resigned/came out, the company has evaluated and re-established/revised the timeline for the appointment of temporary workers that doing harvest work which

was previously planned to be completed in July 2023 to March 2024. The revised appointment program on March 31, 2023 includes:

Unit	July 2023	November 2023	March 2024
JLYE	4	20	17
LBLE	12	30	64
BSRE	51	30	104
PMSE	5	35	78

The company has also shown evidence of temporary harvest worker appointments, such as:

- Appointment Letter No. 039/SK-PT/BSRE/X/2022 dated October 1, 2022 with worker initial MR
- Letter of Appointment No. 006/SK-PT/BSRE/VII/2022 dated 1 July 2022 with worker initial ES
- Appointment Letter No. 006/SK-PT/BSRE/IV/2023 dated 1 April 2023 with worker initial PPS
- Appointment Letter No. 028/SK-PT/BSRE/X/2022 dated 1 October 2022
- Letter of Approval for the Appointment of harvest workers with number 004/VPA3-INT/BNJO/06/2022 for 19 harvest workers at the JLYE unit on June 27, 2022.
- Letter of Approval for the Appointment of harvest workers with number 005/VPA3-INT/BNJO/06/2022 for 12 harvest workers in the LBLE unit on June 27, 2022.
- Etc.

Based on that explanation, the nonconformity is declared fulfilled and the realization of the appointment program that has been made will be ensured/observed again in the next assessment.

Status: Comply

6.3

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

6.3.1; 6.3.2; 6.3.3

The company shows the Sinarmas Agri Business and Food Business and Human Rights Policy dated December 12, 2019 which states:

- Respect the rights and dignity of workers in accordance with legal provisions, provide fair treatment without discrimination and build harmonious industrial relations
- Respect the rights of workers in terms of freedom of opinion, collective bargaining as well as forming and joining labor unions.

The company has conducted socialization related to company policies including freedom of association policies. For example :

- Socialization on January 17, 2023 attended by 45 workers
- Socialization on February 8, 2023 attended by 73 workers
- Socialization on March 7, 2023 attended by FFB supplier

The results of interviews with workers such as harvesters, factory workers and others, known that the company has provided socialization related to freedom of association. From the results of interviews with workers, known that there is labor union in the company. The Labor Union of PT Tapian Nadenggan – Jakluay POM has been registered at the Manpower Office for example:

- BSRE → registration No. 560/364/HIJ dated 4 April 2018.
- PMSE → registration No. B-568.9/358/DISNAKERTRANS-HIJ/II/2022 dated 10 February 2022.

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

- Bipartite meeting on 7 September 2022 which was attended by 40 workers. The meeting discussed about the approval of the bipartite management, the completeness of PPE and the domestic waste transportation schedule

- Bipartite meeting on 4 November 2022 which discussed about rice quality
- Etc

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

Status: Comply

6.4

Children are not employed or exploited.

6.4.1

Company showed the Business and Human Rights Policy of Sinarmas Agri Business and Food issued on 12 December 2019 which states that company The company ensures that it does not employ children in all lines of operations.

The company has conducted socialization related to company policies including prohibition on employing children under 18 years old, forced labor and workers from human trafficking. For example :

- Socialization on January 17, 2023 attended by 45 workers
- Socialization on February 8, 2023 attended by 73 workers
- Socialization on March 7, 2023 attended by FFB supplier

6.4.2; 6.4.3; 6.4.4

The company has a mechanism for recruiting workers which explains that evidence to ensure the age requirement for workers is to ask for a photocopy of the ID of the prospective worker. In addition, for contractor workers, the company has conducted periodic evaluations to ensure that the contractor has complied with applicable regulations, one of which is the age of the worker.

The company has also shown agreement with contractor that have explained the prohibition on employing children under 18 years of age, forced labor and workers from human trafficking. For example Agreement Letter for FFB transporter No. 004/TPN/JKTO-III/XII/2019 - ATBS dated 2 December 2019 and valid until 31 December 2023.

The results of the verification of the labor list document, interviews with internal and external stakeholders, and field observations revealed that there was no indication of any workers under the age of 18. Based on that interview also known that company has socialized company policy including policies about the prohibition on employing children under 18 years of age, forced labor and workers from human trafficking to the stakeholders.

Status: Comply

6.5

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

6.5.1; 6.5.2

Policies regarding the sexual harassment and violence are also available in GAR Social Environment Policy. It explains that every worker is entitled to receive protection against sexual harassment in the workplace and Sexual harassment is an offense and if convicted of sexual abuse offenders will be penalized in accordance with applicable regulations. In addition, the GAR Policy also explains that the company recognizes, respects and strengthens workers' rights including fundamental rights at work.

The company has conducted socialization related to company policies including protection against sexual harassment. For example :

- Socialization on January 17, 2023 attended by 45 workers
- Socialization on February 8, 2023 attended by 73 workers
- Socialization on March 7, 2023 attended by FFB supplier

The results of interviews with workers, especially female workers, revealed that the company had provided socialization

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

6.5.3

The company has identified the needs of new mothers in January 2023. The needs of new mothers based on the identification results are as follows:

- Provides a suitable place for mothers to breastfeed
- Rest time for pregnant women before and after giving birth.
- health checks and monitoring
- provide lighter work
- etc

The results of interviews with female workers and gender committee revealed that the company had given permission or time to breastfeeding mothers. Based on field observation at daycare also known that the company provides breastfeeding rooms for breastfeeding mothers.

6.5.4

The company has a Grievance and Conflict Handling procedure No. SOP/Smart/Sust/IV/003 revision 03 dated 14 February 2022. In the procedure it is explained that:

- Complaints can be submitted directly orally (for those who cannot read and write) or indirectly through the suggestion box
- Information and complaint data received by Social Officer / Head of administrative. The company guarantees the anonymity of whistleblowers and case whistleblowers with the aim of reducing the risk of retaliation.
- Complaints can also be submitted via telephone, short message, email and others.
- Initial response letter no later than 14 working days after the letter is received.
- In terms of handling complaints, it is allowed to involve third parties.

Company has showed socialization document related to grievance mechanism. For example, socialization to contractor on March 13, 2023.

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

	Status: Comply	
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6.6

No forms of forced or trafficked labour are used.

6.6.1; 6.6.2

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

For contract workers/temporary work agreement (PKWT) and casual daily workers, are recruited directly by the company. The company also shows a temporary Work Agreement and casual daily work agreement. For example, agreement for spraying activity with initial AS No. BSRE/PKWT/Div.3/01/2023 dated January 20, 2023 and valid until January 19, 2024. The agreement has explained work requirements such as working hours, wages, permits/leave and others. Example of casual daily work No. 003/LBLE/PKHL/01/2023 dated 1 January 2023 that has explained work requirements such as wages, BPJS etc. The company has also submitted the Work Agreement Report to the Manpower Office. For example, The Work Agreement Report submitted to the Manpower Office on February 21, 2023 for 13 workers.

Regarding the recruitment mechanism for contract workers (temporary worker), the company has a recruitment procedure no. KHI-smart/001-01 which explains that the company does not charge fees and does not hold workers' documents such as passport, ID card etc.

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

Status: Comply

6.7

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

6.7.1

OHS organization

The certification unit already has an OHS organization in the form of an OHS committee as follows:

- **JLYM**

In accordance with the Decree of the Head of the Kalimantan Timur Province Manpower Office Number 566/0180/P2K3/PPK/DTKT/2023 concerning ratification of the OHS organizational structure of the JLYM Committee, established in Samarinda on January 16 2023. The OHS Committee Secretary is a worker with the initials LMJ and a chairman with initials Fr. The CH shows an OHS expert authority card with number 55928/PK3/AJ/31/2022/P1 and an official OHS expert decision letter from the Ministry of Manpower of the Republic of Indonesia dated 07 February 2022, valid until 07 February 2025.

- **JLYE**

In accordance with the Decree of the Head of the Office of Manpower and Transmigration of Kutai Timur Regency Number 566/2221/P2K3/Was concerning ratification of the OHS organizational structure of the JLYE Committee, established in Sangatta on 17 November 2016. The OHS Committee Secretary is an OHS Expert with the initials SFM and the Chair is the Estate Manager. The CH shows an OHS expert authority card with number 55943/PK3/AJ/31/2022/P1 and an official OHS expert decision letter from the Ministry of Manpower of the Republic of Indonesia dated 07 February 2022, valid until 07 February 2025.

- **PMSE**

In accordance with the Decree of the Head of the Office of Manpower and Transmigration of Kutai Timur Regency Number 566/509/P2K3/Was concerning ratification of the PMSE Committee's OHS organizational structure, established in Sangatta on 02 April 2015. The OHS Committee Secretary is a General OHS Expert with the initials SFM and the Chair is the Unit heads. The CH shows an OHS expert authority card with number 55943/PK3/AJ/31/2022/P1 and an official OHS expert decision letter from the Ministry of Manpower of the Republic of Indonesia dated 07 February 2022, valid until 07 February 2025.

- **LBLE**

In accordance with the Decree of the Head of the Office of Manpower and Transmigration of the Province of Kalimantan Timur Number 500.15.18.5/1239/DTKT-III concerning ratification of the organizational structure of the OHS LBLE Committee, established in Samarinda on March 10, 2023. The OHS Committee Secretary is a worker with the initials SFM and the Chair with the initials MA. The CH shows an OHS expert authority card with number 55943/PK3/AJ/31/2022/P1 and an official OHS expert decision letter from the Ministry of Manpower of the Republic of Indonesia dated 07 February 2022, valid until 07 February 2025.

- **BSRE**

In accordance with the Decree of the Head of the Office of Manpower and Transmigration of Kutai Timur Regency Number

566/509/P2K3/Was concerning ratification of the OHS organizational structure of the BSRE Committee, established in Sangatta on April 2 2019. The OHS Committee Secretary is an OHS Expert with the initials SFM and the Chair is the Unit Head. The CH shows an OHS expert authority card with number 55943/PK3/AJ/31/2022/P1 and an official OHS expert decision letter from the Ministry of Manpower of the Republic of Indonesia dated 07 February 2022, valid until 07 February 2025.

Periodic Meeting

The CH has an OHS Committee in each unit which is responsible for the implementation of OHS aspects. One of the activities of the OHS Committee is to conduct monthly evaluations regarding the implementation of the OHS program. For example:

- The OHS LBLE Committee meeting for the period of February 2023 on 03 February 2022 at LBLE which was attended by 12 members. Discusses including MSDS inspections, APAR inspections, PPE inspections, and Work Accident Reports
- The JLYM OHS Committee meeting for the period December 2022 on 06 December 2022 at JLYM which discussed the provision of cover conveyor and transmission chain/belting protection that did not yet exist, as well as evaluation of the achievements of the results of the previous meeting.

6.7.2**Procedure for Handling Work Accidents and Emergencies**

- SOP for Emergency Preparedness and Response (SOP/SMART/General/SADV/I/005)
- SOP/SMART/HESS-EHSD/SADV/I/005 Management of Occupational Accidents and Diseases.

First Aid Officer

The CH has a doctor with the initials dr. SK who already has a certificate of hyperkes as indicated by a certificate of implementation of hyperkes training on 18 to 27 April 2013.

Based on field observations, such as during harvesting and spraying activities, it was found that the foreman was carrying a first aid kit/bag. The results of the interviews revealed that the foremen carrying the first aid kit had received first aid training and were able to explain the name and function of the first aid kit.

Based on field observations at JLYM and the estate office, it is also known that there are evacuation routes that lead to gathering points in case of an emergency. Fire extinguishers and hydrants are available ready to use. The results of the hydrant test in the area around the storage tank function properly.

Records of Work Accidents

Occupational Accidents are monitored regularly as stated in the OHS Committee report and monthly monitoring of work accidents carried out by the OHS committee secretary. As at JLYM, during 2022 there were no work accidents at JLYM. While in LBLE there were 2 work accidents that caused 3 workdays to be lost, due to exposure to thorns and midribs.

6.7.3

The CH has an SOP for Personal Protective Equipment, namely SOP with code SOP/SMK3/SMART/LH-20 regarding the management of personal protective equipment. The scope of this SOP covers all stages in plantations, factories and other supporting units. The procedure also regulates the identification of PPE per activity, specification, replacement, reporting of the results of monitoring the use of discipline, imposing sanctions and rewards. The results of interviews with workers during field observations showed that every morning they were informed about the use of PPE. Tiered sanctions are given by the Chair of the OHS Committee starting from a warning, warning letter (SP) 1, SP 2, and SP3. Regarding the sanctions, it has been stated in CLA article XXII concerning Obligations of Companies and Employees, which states that workers are obliged to carry out orders from their superiors and are obliged to take good care of, use and manage company property companies entrusted to him, as well as sanctions.

Based on observations in the warehousing area, it is known that each unit has a rinse house which functions as a place for washing tools and spraying PPE after spraying, storing PPE and spray equipment, cleaning oneself, and wearing clean clothes before going home. During the audit, spraying work was not carried out because the first rotation was completed.

The results of interviews with spray workers in Block A21 JLYE, Block B31 PMSE, and Block E13 BSRE revealed that workers understood the procedures for washing PPE and work tools, as well as storing PPE in the rinse house.

Based on field observations and interviews with plantation, factory and contractor employees, it is also known that the certification unit has provided PPE to employees in accordance with the risk assessment that was previously carried out. PPE can also be replaced if the PPE used is damaged.

6.7.4

The company shows a record of proof of payment for Employment BPJS and also Health BPJS for all employees in the company's operational environment, for example:

LBLE

- Proof of payment for BPJS Health for the month of February 2023 for 457 workers paid on 6 February 2023.
- Proof of payment for BPJS Employment for the month of February 2023 for 492 workers (permanent and PKWT) paid on 23 February 2023
- Proof of payment for BPJS Employment for the month of February 2023 for 23 workers (permanent and PKWT) paid on 23 February 2023

BSRE

- Proof of payment for BPJS Health for February 2023 for 364 workers paid on 8 February 2023
- Proof of payment for BPJS Employment for the month of February 2023 for 364 workers paid on 24 February 2023
- Proof of payment for BPJS Employment for February 2023 for 129 freelance daily workers paid on 24 February 2023

JLYM

- Proof of payment for BPJS Health for February 2023 for 146 workers paid on February 6, 2023.
- Proof of payment for BPJS Employment for the month of February 2023 for 146 workers paid on 8 February 2023

PMSE

- Proof of payment for BPJS Health for February 2023 for 580 workers paid on February 6, 2023.
- Proof of payment for BPJS Employment for February 2023 for 580 workers paid for February 2023
- Proof of payment for BPJS Employment for February 2023 for 93 freelance daily workers paid on February 2023

JLYE

- Proof of payment for BPJS Health for the month of February 2023 for 506 workers paid on 6 February 2023.
- Proof of payment for BPJS Employment for the month of February 2023 for 674 workers paid on 24 February 2023

Based on interviews with management representatives, it is known that workers with daily casual status/group are not included in BPJS Kesehatan. However, the company has policies listed in the Circular Letter/Memorandum Ref No. 058/CEO 3/12/2016 concerning health services for BHL and BHB workers which was ratified on December 8, 2016 by CEO 3. The document explains that the company provides health care insurance to workers whose care and treatment are borne by the company.

Based on the results of verification of BPJS Kesehatan payment documents along with their supporting documents and interviews with management, it is known that there are differences in the number of workers (permanent and PKWT) paid to BPJS TK and BPJS Kesehatan. The difference in the number of workers is because there are female workers who are dependents of their husbands who also work at PT TN. In addition, there are also several workers registered with PBI, BPJS Mandiri and Jamkesda.

The results of interviews with representatives of trade unions and workers also informed that all workers in company units had been registered with the BPJS Employment program and also the BPJS Health.

6.7.5

Records of work accidents with LTA

Occupational Accidents are monitored regularly as stated in the OHS Committee report and monthly monitoring of work accidents carried out by the OHS committee secretary. As at JLYM, during 2022 there were no work accidents at JLYM. While in LBLE there were 2 work accidents that caused 3 workdays to be lost, due to exposure to thorns and midribs.

Status: Comply

PRINCIPLE #7 PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT
7.1
Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.
7.1.1

The CH has SOP for Pest and Plant Disease Control, as follows:

- SOP No. SOP/SMART/MCAR/VII/TA-HPT dated 15 July 2020 concerning Pest and Disease Control. The procedure explains that the pest control process starts from pest detection (early warning system), census, pest control decisions, requests for recommendations to SMARTRI (research), pest management, control recommendations, control implementation and control evaluation. The procedure also describes the threshold for the economic value of attack by each pest.
- SOP for Rat Control (IK/Smart/MCAR/VII/TA-HPT/07) dated 15 July 2020. A census of mature plants is carried out every 3 months, namely January, April, July and October. The critical threshold for rat attack is 5% of the census. Biological control by observing owls. Chemical control using rodenticides.
- SOP for Detection of caterpillars eating oil palm leaves (IK/Smart/MCAR/VII/TA-HPT/01) July 15 2020. UPKDS detection is carried out every 2 months. When an attack occurs, it is not necessary to carry out a detection, but a direct census.
- SOP for Control of Palm Leaf-eating Caterpillars (IK/Smart/MCAR/VII/TA-HPT/03) dated 15 July 2020 by planting beneficial plants, such as *Turnera ulmivolia* and *Cassia* spp. along Main Road (MR) and Collection Road (CR), as well as *Antigonon leptosus* on the corner of the block.
- IK census and control of Ganoderma (IK/Smart/MCAR/VII/TA-HPT/10) on 15 July 2020. A census was conducted on 100% of the plants using a plant census map. In endemic areas, the census begins when the plants are 3 years old and if there is no attack, the census is carried out once a year.

The results of field observations in Block H13 JLYE, Block C42 PMSE, and Block D14 BSRE revealed that there were no rat bite marks. The results of interviews with Harvesters and loose fruits pickers in the harvest blocks and the Harvest Clerk at BSRE, it was found that there were no rat bite marks and no caterpillars.

Based on the explanation above, it is concluded that the company already has an SOP for observing and controlling pests.

7.1.2

Invasive species in Indonesia refer to the Minister of Environment and Forestry Regulation number P.94 of 2016. The results of field observations at JLYE, PMSE, and BSRE, it is known that the beneficial plants planted are dominantly *Turnera ulmivolia* which is an invasive species according to the intended LHK regulation. Observation results show that the plant is in good condition.

7.1.3

The results of document review and interviews with company representatives found that the pests found in the company area were rats with conditions below the threshold. Control is carried out using Tyto alba by breeding and preparing cages and or perching stakes in the field. Control does not use fire. The results of field observations on harvesting and maintenance activities at JLYE, PMSE, LBLE, and BSRE found no use of fire. Based on this, it is known that there is no application of pesticides through the air.

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 results of the document review and field observations in the circle path work were known to use pesticides. The basis for the use of specific pesticides against target pests/weeds has been shown by the company in the Chemical List document used to refer to the Pesticide Commission. For example, the Roll up pesticide for Broad-Leafed Weeds and Narrow-Leafed Weeds, and erkafuron for Broad-Leafed Weeds.

7.2.2

The CH has maintained records of pesticide use. It has been shown in the Document List of Chemicals used to refer to the Pesticide Commission which contains the pesticide brand, active ingredient, LD50, and use of active ingredient per hectare. For example, in 2022 the use of roll ups in PMSE is 2,611.45-liters, with an LD50 of 5000 mg/kg, 41% active ingredient, with an active ingredient per ha of 0.241 liters/ha.

7.2.3

The CH has a commitment to minimize the use of pesticides and has the IPM concept. Commitment document to reduce the use of paraquat herbicide. This is stated in the Memorandum of the President Director No. 044/PD/IX/2014 dated 21 November 2014 concerning the use of paraquats. The memorandum reaffirmed the commitment to reduce paraquats by $\pm 30\%$ starting in 2015 and no longer using them in 2016. On August 13, 2015, the President Director again issued memorandum No. 032/PD/VIII/2016 concerning the Use of Paraquats. The memorandum emphasized that since early 2016 there was no longer any use of paraquats for weed eradication. In addition, in the GAR Social and Environmental Policy – GSEP (GAR Social and Environmental Policy) which was passed on September 8, 2015, one of them states "awareness of the attention paid to the use of chemical fertilizers and pesticides and aims to reduce the use of fertilizers and pesticides, eliminating gradually the use of dangerous chemicals, stop the use of paraquat.

Meanwhile for IPM, its implementation has been demonstrated by developing useful plants as predatory hosts for leaf-eating caterpillars and using *Tyto alba* for biological control of rats. The results of the document review revealed that there was a decrease in the use of herbicide-type pesticides between 2021 and 2022. For example, at JLYE, the use of Roll up in 2021 was 2,280 liters and in 2022 it was 1,860 liters.

Documents on maintenance/planting of beneficial plants such as *Turnera ulmivolia* and *Antigonon leptosus* have also been shown. BOB monitoring is also carried out in all company units, for example 34 units in BSRE, 55 PMSE units, and 51 LBLE units. The results of field observations also revealed that there are *Turnera ulmivolia* and *Antigonon leptosus* plants along CR and MR roads, such as in Blocks A23/24 JLYE, Blocks B36 and B38 PMSE, and Block E/D 16 BSRE.

7.2.4

The results of the document review and interviews with management representatives, as well as field observations revealed that there was no prophylactic use of pesticides.

7.2.5

The results of interviews with company representatives revealed that The CH has a commitment/policy not to use pesticides that are included in WHO classes 1a and 1b, or included in the Stockholm convention, as well as paraquat. The results of a review of pesticide use documents for the 2022 period found that the pesticides used included roll up and erkafuron which were not included in WHO classes 1a and 1b, or included in the Stockholm convention. The results of field observations in circle path activities and interviews with sprayers in Block A21 JLYE, it is known that workers use Roll up and erkafuron materials. The results of interviews with workers/company representatives found that in the last 1 year they used Roll up and Erkafuron pesticides. Based on this, it is known that there is/is no use of pesticides included in WHO classes 1a and 1b, or included in the Stockholm convention, and paraquat in company operations.

7.2.6

Pesticide applications have been carried out by persons who have completed the necessary training, and have been applied according to the product label. The results of interviews during field observations at circle path activities in Block A21 JLYE, Block B31 PMSE, and Block E13 BSRE, it is known that workers have been able to explain regarding the safe handling of pesticides according to procedures. Informed by informants that they have received training in handling pesticides from the company. The results of field observations also show that workers have implemented safe work techniques. The results of the document review revealed that pesticide training had been held at the company, including

on March 18 2023 at the BSRE and LBLE.

7.2.7

The storage of pesticides at the company complies with best practices. The results of field observations in the pesticide warehouse area at JLYE, LBLE, PMSE, and BSRE show that pesticides have been grouped by type, have an MSDS in a language understood by workers, symbols for hazardous and toxic materials, in a place with good air circulation and good lighting. Enough. The warehouse is locked and there is a limited area warning and the use of PPE when accessing it. The results of interviews with workers revealed that workers could explain and demonstrate safe work techniques in that area.

7.2.8

The certification unit has SOPs and work instructions related to hazardous waste management which are contained in the

- SOP for Waste Management with document number SOP/SMART/LEMS-EHSD/SADV/II/002 dated July 2, 2014 which was legalized by the head of upstream. This procedure describes the identification and management of waste generated from the company's operational activities, including agrochemical packaging waste.
- Regarding the procedure, unit certification applies the steps outlined in the work instructions (known as IK) for the handling of the pesticide packaging produced (IK/SMART/LEMS-EHSD/SADV/002/001), among others by doing:
 - Separate the used pesticide packages measuring 20 liters and sizes <20 liters. Visually make sure that the packaging submitted does not contain chemical residues
 - Bring the used pesticide packaging <20 liters to the hazardous waste storage and record it in the logbook
 - Bring the used pesticide packaging 20 liters to the pesticide packaging rinsing place
 - Enter pressurized clean water of $\pm 1/10$ of the volume of the container and rinse by shaking until it hits the entire wall of the container. Rinsing was carried out 3 times. Collect the rinsed water into the rinse water reservoir
 - Store rinsed clean packaging in the warehouse, used rinsed packaging can be reused for the same activities and/or stockpiled and/or returned to the supplier and/or in accordance with the MSDS of the material.
 - The remaining rinsing water can be used for the next mixing process to optimize the use of agrochemicals.

From the results of field visit in housing area *Pondok* 1 (emplacement) 1 at Jakluay Estate and Pondok 2 Long Buluh Estate, it was found that there were no traces of chemical packaging used as water reservoirs or other housing activities. From the results of documents review, in the form of waste manifests and Hazardous Waste Processing Data for washing log book and management purposes, it is used as a water container for spray activities. Based on interviews with employees and the foreman of pesticide application Muara Wahau Estate, it is known that all pesticide packaging is collected at the designated storage area and the company coordinates with collectors to recycle and not be used for purposes other than pesticide application activities.

7.2.9

The results of document review and interviews with company representatives found that the pests found in the company area were rats with conditions below the threshold. Control was carried out using *Tyto alba* by means of breeding, spreading in every block with provided nests. The results of field observations in circle path activities in Block A21 JLYE, Block B31 PMSE, and Block E13 BSRE found that there were no air spray applications and used a knapsack sprayer. Based on this, it is known that there is no application of pesticides through the air.

7.2.10

The CH already has health inspection procedures for workers with the SOP/SMK3/SMART/LH-23 code regarding worker health checks. Health checks for pesticide handlers are carried out twice a year, namely CHE examinations carried out by the company in collaboration with the Permata Husada Main Clinic. The implementation of the CHE inspection on March 15 – 20 2023, including the following:

- JLYE for foremen, sprayers, fertilizers, Warehouse officers as many as 60 people with the results of 6 people outside the normal range, and has been shown to follow up efforts to mitigate the impact of exposure by moving to jobs not related to chemicals.
- BSRE for the foreman, sprayer, maintenance, Warehouse staff as many as 29 people with the result of 1 person outside the normal range, and has shown follow-up efforts to mitigate the impact of exposure by temporarily moving to work not related to chemicals.
- JLYM for laboratory, boiler, WTP, and warehouse staff of 20 people with results within normal limits.

- LBLE for foreman, sprayer, maintenance, Warehouse staff of 37 people with results within normal limits.

Based on this, it is known that records of the results of annual special health checks for pesticide operators and evidence of follow-up inspections have been made available.

7.2.11

The CH has a commitment regarding pesticide applicators not being carried out by pregnant or lactating women, or people with medical limitations. The results of field observations in circle path activities in Block A21 JLYE, Block B31 PMSE, and Block E13 BSRE found that there were no female workers who were pregnant and/or breastfeeding, or with medical limitations. The results of the interviews revealed that women workers who were pregnant or breastfeeding, or workers with medical limitations were transferred to non-pesticide jobs. Based on this, it is known that there are no workers who are pregnant, or breastfeeding, or with medical limitations who apply pesticides.

Status: Comply

7.3

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

7.3.1

The certification unit already has SOPs and work instructions related to Hazardous and Toxic Waste management which are contained in the SOP for Waste Management with the document number SOP/SMART/LEMS-EHSD/SADV/II/002 dated July 2, 2014 which signed by the head of upstream. This procedure describes the identification and management of waste generated from the company's operational activities, for example:

- Solid waste in the form of shells, fiber and empty leaves is fully utilized to support plantation activities and palm oil processing factories. The shell and fiber are used for boiler fuel, while the empty leaves are applied as organic fertilizer in oil palm plantations.
- Liquid Waste from processed FFB (Raw effluent) is fully utilized for plantation activities as organic liquid fertilizer (Land Application) after going through the processing process in a wastewater treatment plant (WWTP) pond to meet the quality standard requirements according to regulations.
- Boiler ash is used for stockpiling.
- Liquid waste from ex-factory operations is accommodated in a sedimentation tank to settle dissolved solids. The solids in the sedimentation tank are then removed and stockpiled periodically, while the sediment water is discharged into the waters
- Waste gas is generated from boiler chimney and generator emissions. Gas waste is periodically monitored for emission tests in accordance with applicable regulations
- Domestic solid waste in the form of household and office waste is managed by collecting and stockpiling in the final waste disposal site and the final waste storage requirements are far from settlements, flood-free locations, and not swampy puddles.
- Hazardous waste is stored in hazardous dan toxic waste storage and handling according to its type and characteristics.
- Non-solid hazardous waste is collected and can be reused or sold.
- Medical waste in the form of used syringes, expired drugs, used bandages, etc., is stored in a place provided and handed over to a hospital that has a permit for destruction.

Regarding the procedure, unit certification applies the steps outlined in the work instructions, such as;

- Handling of pesticide packaging produced with No. IK/SMART/LEMS-EHSD/SADV/002/001
- Handling of used fertilizer packaging with No. IK/SMART/MCAR/IX/TA-PPK rev.01 February 1, 2019

Hazardous and Toxic Waste

Unit certification has a temporary storage permit for Hazardous and Toxic waste, through he Decree of the Head of DPMPPTSP of East Kutai Regency No.503/11/DPMPPTSP-PPNP/TPS-LB3/IX/2018 concerning Granting Extensions Permit for Temporary Storage (TPS) for Hazardous and Toxic Waste to PT. Nadenggan Tapian in Muara Wahau District, East Kutai Regency; valid from 12 September 2018 - 12 September 2023. According to the license, the company has 6 units

(4 units are included in the scope of certification), namely:

- PKS Jakluay with coordinates 116°54'53.36" E and 00° 56' 54.29" N
- Jakluay Estate 116°55'54.55" E and 00° 58' 24.15" N
- Pantun Mas Estate 116°57' 9.96" E and 00°57.32" N
- Long Buluh Estate 116°56'54.58" E and 00°56'41.56" N

Based on the permit, it is known that the types of waste that are allowed to be stored in TPS are used oil, used filters, used chemical packaging, medical waste, expired chemicals, printer ribbons, used cartridges, used batteries of electronic waste, used cotton rags, expired chemicals and others resulting from the company's operational activities. The shelf life of waste is based on PP No 101 of 2014.

In the management, utilization and/or processing of waste PT Tapian Nadenggan is collaborated with licensed parties.

Solid Waste

The solid waste produced by the company is shell, fiber and empty fruit bunch. The management plan is carried out by reusing solid waste such as shells and fiber to be reused as boiler fuel. Meanwhile, solid waste such as EFB is reused by applying it to plantation areas.

Liquid Waste (POME)

Liquid waste generated from the factory is reused for Land Applications (LA). Before being channeled to LA, the liquid waste is first managed at the WWTP with the aim that the quality of the liquid waste flowing to LA is in accordance with the provisions.

Domestic Waste

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

7.3.2

Unit of certification already has a document on the results of monitoring the implementation of hazardous and toxic waste management procedures according to PP No. 22 of 2021 which is contained in several documents, including:

- Document of hazardous waste source identification results for the 2022 period which provides information regarding the sources of hazardous and toxic waste that have been identified by the company, either from the plantation or from the mill.
- Balance Sheet and Logbook for storing hazardous and toxic waste at the storage area.
- Conducting socialization of hazardous and toxic waste management to employees.
- OHS Completeness Monitoring Document which informs the condition and completeness of emergency response facilities in storage areas, such as first aid kits, eye wash and shower checks, fire extinguishers, spill kits (majun) and alarms. The monitoring results show that all equipment is in good condition and in accordance with company SOPs.

From the results of the document review by comparing the balance sheet and logbook, it can be seen that the submission of waste to storage for March 2023 was appropriate and there was no difference in the amount submitted. Thus it can be concluded that there are no recording errors and discrepancies based on the Balance Sheet, Logbook and Festronik documents, this indicates that the company has properly documented the storage and handling of hazardous waste. So it can be concluded that the company carries out waste disposal according to procedures that are fully understood by workers and managers.

The result of interview with manager related to proper disposal of domestic waste known that there are trash bins and routine transportation carried out by management but in the rainy season delayed due to road conditions, management also held the socialization periodically on housing cleanliness, waste separation, no burning of garbage, prohibition of using hazardous waste containers, and segregation between organic and an-organic waste before disposed in Landfills.

7.3.3

The unit certification does not use open burning for waste disposal. It can be proven through document review and

management interviews, that the company has a Waste Management Procedure document with No. SOP/SMART/LEMS-EHSD/SADV/I/002 rev. 00. The scope of this procedure is for factories, estates, housing, and offices at PT Tapan Nadenggan – Jak Luay Estate, as a reference for handling agrochemical waste including used pesticide packaging, palm fronds, liquid waste, empty bunch fruit, solid decanter waste, hazardous waste, household (domestic) and office waste.

Waste management applied based on Sinar Mas plantation internal regulations and government regulations on a clean production approach with several principles, including:

- Reduce, Reuse, and Recycle (3R)
- Zero burning
- Disposal

It is also proven through the waste transportation manifest and the results of field observations in housing area there are traces of burning waste in which there is residual plastic waste. Interviews with employees who live in the housing estate explained that the burning was carried out because of the accumulation of garbage caused by delayed waste transportation due to road conditions during the rainy season.

Status: Comply	
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7.4

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

7.4.1

The CH has procedures regarding soil fertility for productivity and has minimal impact on the environment. It is contained in the fertilization procedure with the SOP/SMART/MCAR/IX/TA-PPK code, coming into force on July 15 2020. The SOP explains that fertilizing mature plants (TM) no longer uses recommendations such as those in the immature plant phase. For plants produce fertilizer recommendations for the coming year based on the results of analysis of leaf samples (LSU) and soil samples (SSU). LSU is carried out once every 1 year by taking a 10% sample in 30 Ha while for SSU it is carried out once every 5 years by taking an odd tree sample from the LSU tree sample. Sampling of SSU in 1 tree includes 4 points (2 points of the circle area, 1 point of path area, and 1 point of *gawangan mati* (staking area) with 2 depths (0-15cm and 15-30cm depth).

7.4.2

The most recent soil and leaf tissue analysis records published by the Smart Research Institute are available. Soil analysis with test parameters including pH, Organic C, N, P2O5, Ca, Mg, K, Na, CEC, and KB. Leaf analysis with test parameters including N, P, K, Mg, Ca, B and Cl. The results include the following:

- Analysis of LBLE leaves on 18 July 2022 for a total of 45 samples.
- Analysis of BSRE leaves on 6-7 July 2022 with a total of 23 samples.
- Analysis of JLYE leaves on 5-6 July 2022 with a total of 99 samples.
- PMSE leaf analysis on 20 June 2022 for a total of 30 samples.
- Soil analysis on 18 August 2020 for 72 BSRE samples.
- Soil analysis on 21 August 2020 for 130 LBLE samples.
- Soil analysis on 21 August 2020 with 6 JLYE samples.
- Soil analysis on 25 June 2020 for a total of 60 PMSE samples.

7.4.3

Elemental recycling strategies such as EFB and LA are available. The results of field observations in Block C14 JLYE found that mechanical EFB applications had been carried out using Errepi heavy equipment at a dose of 3 tons/ha/year. The results of field observations in Block C21 JLYE also revealed land application activities with a dose of 375 m3 per year.

7.4.4

The CH has maintained records of the use of fertilizers that have been applied to the estate. Fertilization is guided by fertilizer recommendations. The results of the interviews revealed that the realization of fertilization was 100% of the

recommendations. For example, the application of Urea at BSRE in semester 2 of 2022 has been applied 100% of the recommended 319,650 tons.

Status:	
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7.5

Practices minimise and control erosion and degradation of soils.

7.5.1

The CH has a soil suitability map report issued by Plantation Monitoring and Planning Division year 2013 which included a description of the soil types, topography, soil texture, drainage condition, land suitability level, and the limiting factor. The map is available on a 1:50,000 scale. Soil types in PT Tapian Nadenggan such as typic endoaquept, typic dystrodept, typic hapludults, and others. This type has a texture of sandy and sandy clay with land suitability values in the S2 and S3 classes. The limiting factors are soil texture, drainage, topography, and rocks in the root zone.

To overcome soil limitations as mentioned above, several strategies that has been implemented by estate management are: fertilizer application has follows agronomist recommendation, adopting EFB mulching application on low fertility areas at a dose of 250 kg/stand, land application by POME, frond stacking parallel to the contour line on the hilly areas and/or U-shape on the flat to undulating areas, as well as to maintain soft grasses and selective weeding which aims to retain soil moisture.

7.5.2

Based on field observations at JLYE, PMSE, BSRE, and LBLE found that there was no replanting activity. The results of the interviews and document review also revealed that there is no replanting plan yet.

7.5.3

Based on field observations at JLYE, PMSE, BSRE, and LBLE found that there were no new planting activities. The results of the interviews and document review also revealed that there were no plans for new plantings.

Status:	
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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 CH has a soil suitability map report issued by Plantation Monitoring and Planning Division year 2013 which included a description of the soil types, topography, soil texture, drainage condition, land suitability level, and the limiting factor. The map is available on a 1:50,000 scale. Soil types in PT Tapian Nadenggan such as typic endoaquept, typic dystrodept, typic hapludults, and others. This type has a texture of sandy and sandy clay with land suitability values in the S2 and S3 classes. The limiting factors are soil texture, drainage, topography, and rocks in the root zone.

To overcome soil limitations as mentioned above, several strategies that has been implemented by estate management are: fertilizer application has follows agronomist recommendation, adopting EFB mulching application on low fertility areas at a dose of 250 kg/stand, land application by POME, frond stacking parallel to the contour line on the hilly areas and/or U-shape on the flat to undulating areas, as well as to maintain soft grasses and selective weeding which aims to retain soil moisture.

7.6.2

Based on field observations in Block C39 PMSE, it is known that the company has a felt area. The results of field observations also show that the plants on the terraces are in good condition and there are no landslides on the terraces. The results of the document review found that terrace areas were found in PMSE and LBLE, with the youngest planting year 2007 and the oldest 2011 in MSE, and 2008 planting year in LBLE.

7.6.3

The results of field observations revealed that the information on land and topographic surveys has become a guide in

the construction of roads, drainage canals and other infrastructure.

Status: Comply

7.7

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

7.7.1 – 7.7.7

Based on soil suitability map report issued by Plantation Monitoring and Planning Division year 2013 which included a description of the soil types, topography, soil texture, drainage condition, land suitability level, and the limiting factor. Soil types in PT Tapan Nadenggan such as typic endoaquept, typic dystrodept, typic hapludults and others. There is no peat soil in operational area PT Tapan Nadenggan.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The certification unit has a water management plan that is implemented to support efficient use of water sources and continuous availability, through operational procedure documents to control the Protection of River Border Areas with document No. SOP/SPO/SMART/LH-06 dated 1 July 2010, which contains: objectives, scope, references, definitions, duties and responsibilities, and work steps. To avoid negative impacts on other users in the water catchment area, the company carried out activities, including: prohibiting the planting of oil palm on the river border with a width of 50 meters left and right, prohibiting land cultivation on the river border by installing notice boards, constructing boundary roads in managed areas (known as *pringgan*), cultivation without spraying (no spraying) around the river, manual maintenance. Some examples of management and monitoring procedures that the company has, such as:

- Procedures for managing and monitoring water resources with document No. SOP/SMART/BCOS-EHSD/SADV/II/2014 dated July 1, 2014 which was approved by the sustainability head which explains the plan for managing and monitoring water resources, water resources conservation techniques based on the *KepPres* No. 32 tahun 1990, for example planting erosion-reducing plants, manual maintenance of oil palms, outreach activities, and monitoring of water resources.
- Memorandum No. 002/SMD OPS/II/2009 dated January 6, 2009, which explains that in clearing land for new plantings, it is ensured that the watershed is protected by not opening the riverbank area as wide as 50 – 150 meters depending on the size of the river. In that area, a notice board should be installed that the area is a protected watershed area and should not be cultivated. On the border of the managed area with the watershed area, a border road (known as *pringgan* area) should be made.

In its implementation of water management as an effort to support efficient use of water sources and continuous availability, as well as avoiding negative impacts on other users in the water catchment area, the certification unit conducts periodic testing of surface water and groundwater which is carried out and reported every semester, stated in the RKL-RPL report for each unit. For example for the period July-December 2021. Surface water quality testing is carried out by the laboratory which has been accredited by KAN, at several sampling points at PT Tapan Nadenggan, including: Up Stream and Down Stream of Pantun River.

The test results on river water quality with quality standard of PP No. 22, 2021, and groundwater quality testing with the quality standard of *Peraturan Menteri Kesehatan* No. 32, 2017 attachment II regarding the requirements and monitoring of water quality, it is known that all parameters are still in the applicable quality standards.

Several management activities have been carried out by the company to avoid negative impacts on other users in the water sources area, including:

- Establishment of a riparian buffer zone/river border area with a width of 100 meters and make the area an HCV area
- Enrichment of plant species in river riparian areas, to restore the natural function of the river.
- Not replanting at the 100 meter boundary from the riverbank and marking yellow paint as the limit area for chemical application and conducting routine monitoring to replace or repair damaged marks
- Conduct socialization to the community, employees and contractors in the company area

- Installing information boards for activities limited to HCV areas, such as; prohibition of burning, hunting and maintaining cleanliness
- Periodic monitoring of river riparian areas

The results of interviews with resident in the housing area of Bukit Subur Estate *Pondok 3* workers revealed that there were no problem with availability of clean water, water was obtained free of charge, with the criteria of being odorless, colorless, and tasteless.

It can be concluded that there is access to clean water for workers and nearby villages, the certification unit carries out water management by monitoring water quality standards on a regular basis, to ensure that there is no contamination of the water used as a result of the activities of the certification unit, and as an efforts of sustainable management of water resources.

7.8.2

Water resource protection carried out at PT Tapan Nadenggan focuses on river borders which are also identified as HCV 4 areas. River border protection efforts refer to the 2014 Sustainability SOP, which aims to:

- Ensure the quality of river water so that it can be used sustainably
- To prevent high erosion and sedimentation

With a management strategy in the form of:

- Establish boundaries with the HCV attributes of environmental services
- Do not apply chemical fertilizers on riverbanks that have been designated as HCV
- Do not jack up natural wood saplings on river borders
- Planting erosion prevention plants on riverbanks to avoid high erosion
- Internal and external socialization (employees, staff, and community) in the scope of the plantation and mill

The company has documents on water management and maintenance of water sources for the period 2022. These include:

1. Report on the Implementation of the Environmental Management Plan (RKL) and Environmental Monitoring Plan (RKL) which contains management and monitoring of surface water (rivers) in plantations which are carried out every semester.
2. HCV Management and Monitoring Implementation Report containing management in the Pantun River. For example, based on HCV area management and monitoring report, the following activities have been carried out:
 - Set a border with the HCV attribute
 - Installation of HCV boundary markers
 - Prohibition of the application of chemical fertilizers on riverbanks that have been designated as HCVs (maintained manually)
 - Prohibition of jacking natural wood saplings on river borders.
 - Planting erosion prevention plants on riverbanks to avoid high erosion
 - Carry out rehabilitation activities for HCV areas at the border to return the river border area to a forested area, with the types of *vertiver grass*, *bamboo*, *guatemalagrass*, etc. For the period of 2022.
 - Carry out rehabilitation plant maintenance carried out and reported by the HCV PIC for each plantation.
 - Conduct direct socialization which is carried out periodically once a year to workers and villages around the plantation
 - Installation of attributes, warnings, and posters in HCV areas, as an indirect means of socialization.
 - Involve the community if there is an environmental conservation program that requires the attention of the surrounding community

Based on the results of field observations in the conservation area, Pantun River, Block C29 Division 2 in Pantun Estate have been equipped with spray boundary signs, area boards protected areas, and planting areas of woody plants.

7.8.3

Management of POME from oil palm processing from with totaling 7 waste ponds with a multi feeding system that is by feeding simultaneously evenly. Based on these data, and when compared with the responsibility contained in the Permit document from DPMPSTSP Kutai Timur Regent No. 503/02/DPMPSTSP-PPNP/L.A/II/2020 indicates that the company has complied with. Before being used, the liquid waste is processed until it reaches the standard for wastewater utilization in oil palm plantations, with pH 6-9 and BOD 5000 mg/l. POME is managed in accordance with applicable national regulations, according KepmenLH No.28 & 29 of 2003 regarding Technical Guidelines for Assessment of Wastewater Utilization from Palm Oil. Wastewater from the WWTP pond outlet is then pumped and used as a designated location for the use of waste water on the ground (Land Application) with 915,2 ha. This application dose covers the entire liquid waste generated by the factory, so there is no discharge of POME into water bodies

The company can show documents regarding the results of the measurement of the quality of POME, namely the POME Report per quarter and the RKL-RPL Implementation Report per semester which includes the results of the measurement of the quality of POME every month and land application monitoring well. The test is carried out by the KAN accredited laboratory. Based on the analysis of the test document, it shows that all the parameters tested are in accordance with the applicable quality standards (especially for pH and BOD) and for waste water utilization to be applied to land its does not cause pollution to the environment.

7.8.4

The certification unit already has a groundwater utilization permit based on the *Keputusan Menteri Pekerjaan Umum dan Perumahan Rakyat* No. 115/KTPS concerning Groundwater Concession Permit dated 10 January 2023 which is valid for 5 years from the date. It is explained in the permit that the maximum quota for water intake discharge is **62.281 m³/month** taken from 1 intake location at Pantun River, Jakluay Village, Muara Wahau District, Kutai Timur Regency, Kalimantan Timur (116°55'45,4" BT dan 00°57'00,50" LU)

The water usage for FFB processing has been monitored and documented. The document of water usage in period of January – December 2022 shown that the water usage in the range of **37.880 m³/month**, this range is still in accordance with the water quotas that can be utilized with the quota specified in the permit held. The unit certification also paid of water usage retribution every month for the entire scope of certification

From the results of management interviews and field observations by virtual to the Water Treatment Plan (WTP) it can be confirmed that the certification unit has replaced the water pipe leading to the reservoir, so that water can be used more efficiently. The flowmeter used is still functioning properly, and the officer responsible for WTP is very understanding about how the WTP works and recording flowmeter data. Officers can also show data in and out of water which is recorded every day.

Status: Comply

7.9

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

7.9.1

The unit of certification using of fossil fuels to increase the efficiency and to optimize monitored and renewable energy. This can be proven by recording documents on the application of the use of shells and fiber from the rest of the mill production process as renewable fuel for boiler purposes in 2022.

Based on the results of interviews and document verification, it shows that all solid waste in the form of shells and fiber is used to substitute diesel fuel, this utilized and the usage data recorded in detail and traceable. For example, the company shows data on the use of shells and fiber as a substitute for fossil fuels for the period 2022. From this data, it is known that the company has saved 896,485 liters or equivalent with saved emission 399.26 kgCO₂e of diesel fuel, of the total diesel that should have been used as evidence of energy efficiency produced from use of renewable energy.

Status: Comply

7.10

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

7.10.1

Certification Unit has been conducted source identification and GHG valuation by doing GHG inventory within the scope of Jakluay POM and its supplies based monitored through Palm GHG Calculator 4.0 and the summary result reported and accesible to public in RSPO website. The company has identified the significant GHG emissions, including: land used change, POME processing, used of fertilizers and pesticides, used of fossil fuels for operations and transportation.

Also made several mitigation plans to control the impact among GHG emission, such as: the right dose of fertilizer use and application as recommended, reduction of reuse and recycling actions, restrictions on electricity use, transportation and machine maintenance, and periodic air quality tests.

Reduction of fossil fuels at Jakluay POM has been implemented by using fiber and shells. The company also uses POME with test results from the monitoring, showing that all wastewater testing parameters have met the applicable quality standards. Based on the review of documents for example: monitoring of pesticide use, monitoring of diesel fuel, identification of HCVs and others it is found that accurate data have been entered into the RSPO palm oil GHG Calculator. GHG calculation using palm GHG Calculator 4.0. The summary of GHG emissions for the period January - December 2022, is listed as follows:

Summary Emissions

Description	Value	Unit	Description	Value	Unit
CPO	0.71	tCO ₂ e/tProduct	Oil palm planted on mineral soil	16798.92	Ha
PK	0.71	tCO ₂ e/tProduct	Oil palm planted area on peat	0.00	Ha
PKO	0.00	tCO ₂ e/tProduct	Total oil palm planted area	16798.92	Ha
PKE	0.00	tCO ₂ e/tProduct	Conservation area (Forested)	97.66	Ha
OER	20.54	%	Conservation area (non-Forested)	348.73	Ha
KER	5.26	%	FFB Production per hectare	27.43	t/ha

Mill Emissions and Credits & Emissions from Palm Kernel Crusher

Mill Emissions and Credits			Emissions from Palm Kernel Crusher	
Emission Source and Credits	tCO ₂	tCO ₂ e/t FFB	Emission Source	tCO ₂ e
POME	89103.47	0.20	PK from own mill	0.00
Fuel Consumption	679.72	0.00	PK from other sources	0.00
Grid Electricity Utilization	0.00	0.00	Fuel Consumption	0.00
Export of Excess Electricity to Housing & Grid	0.00	0.00	Total Crusher Emissions	0.00
Sale of PKS	0.00	0.00		
Sale of EFB	0.00	0.00		
Total	89783.19	0.20		

Estate / Plantation Field Emissions and Sinks

Description	Emission (tCO2e)			TOTAL
	Own	Group	3rd Party	
Emission Source				
Land Conversion	117275.91	0.00	0.00	117275.91
CO2 Emissions from Fertilizer	138875.81	0.00	0.00	138875.81
N2O Emissions from Peat	0.00	0.00	0.00	0.00
N2O Emissions from Fertilizer	12896.76	0.00	0.00	12896.76
Fuel Consumption	3406.14	0.02	0.00	3406.14
Peat Oxidation	0.00	0.00	0.00	0.00
Sinks				
Crop Sequestration	-154249.34	0.00	0.00	-154249.34
Sequestration in Conservation Area	-885.28	0.00	0.00	-885.28

Total	-7680.02	0.00	959.90	-6720.12
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Palm Oli Mill Effluent Treatment				
POME Treatment	Unit	Value		
POME Diverted to Compost	%	0		
POME Diverted to anaerobic digestion	%	100		
• POME to anaerobic pond	%	100		
• POME to methane capture (flaring)	%	0		
• POME to methane capture (electricity generation)	%	0		

**POME is processed in WWTP*

7.10.2

There is no new land development by the company. Consistent with the previous assessment, the company planted 51.45 Ha in 2014, while the plantings carried out in 2014 had gone through the NPP process in 2013 with the 2010 NPP standard to carbon stocks.

7.10.3

The company has identified source of waste pollution and emissions from Estate and Mill activities for the period 2022. Sighted the result of identification of emissions and pollution as well as its sources, such as in estate emissions sources are from fossil fuel usage for transportation and generator, emission from fertilizer usage, pesticide usage and electricity usage. Identified the sources of emission and pollution from mill such as fossil fuel usage, electricity usage and WWTP. In addition, the company also conducts tests related to odour and vibration tests in work and residential areas.

Fossil fuel reducing have been implemented on Jakluay POM by fiber and shell usage. Realization of renewable energy have been monitored on monthly report for fiber and shell usage. Monitoring for emission and pollutants (air emission and air ambient) from Estate and Mill was done periodically and comply with the standards quality, it's covered on RKL/RPL implementation report and reported to Environmental Agency of Kutai Timur Regency. Therefore, it can concluded that the plans to reduce or minimize the pollutants are implemented and monitored well by management.

	Status: Comply	
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7.11

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

7.11.1; 7.11.2

The results of the area statement document verification, interviews with management and stakeholders as well as field observations, revealed that there were no new plantings or replanting in the certification unit.

The company has procedures related to fire prevention and control which are listed in the following procedures:

- SOP for Emergency Preparedness and Response with document number SOP/SMART/UMUM/SADV/II/005. Rev 0.0 was passed on 01 July 2014 by the Head of Upstream. This SOP is intended as a guide in identifying. Prevent potential and overcome emergencies in plantations, factories and other support units in the Sinarmas plantation area and its subsidiaries.
- Land Fire Handling Procedures listed in SOP No. SOP/NP/SMART/XI/LH002 which was approved by the Div Head of SMARTRI on July 01, 2010. Broadly speaking, the SOP contains fire prevention equipment and infrastructure, the duties and responsibilities of the emergency response team, mechanisms for handling fire incidents, reporting mechanisms and recovery from an emergency

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

- Conduct regular patrols of fire-prone areas.
- Has a fire watch tower. For example, the results of a field visit at block C19 JLYE found that the fire monitoring tower was still functioning properly.
- Monitoring fire facilities and infrastructure owned every month.
- Has an emergency response team structure to deal with fires
- Conduct training simulations on a regular basis
- Submitting a report on the implementation of prevention and management of forest and land fires for the 2022 period

to the Plantation Service oh Kutai Timur on 21 March 2023.

The company can show a list of emergency response preparedness equipment along with a recording of its condition monitoring which is carried out every month, as for the list of emergency preparedness equipment owned by the company as of January 2023, such as :

- Water tanks
- High pressure water pumps
- Suction hoses
- Outlet hoses
- Nozzles
- Beaters/fire beaters
- GPS
- etc

The results of an interview with the Plantation Agency and Environment Agency, known that the emergency response equipment owned by the company are quite adequate. In addition, there is no history of fires or the appearance of hotspots in the company area within the last 1 years.

7.11.3

The company can show recordings of periodic training, for example the Minutes of Socialization emergency response of forest and land fires which were carried out on 27-27 June 2022, which involved local stakeholders.

Based on the results of field observations in the operational activities, it shows that there is no operational activities that use fire. Based on interviews with management and external stakeholder, it was stated that all land clearing activities were done mechanically.

	Status: Comply	
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7.12

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

7.12.1 & 7.12.8

The company can show some evidence of LUCA's progress, namely:

- LUCA Review Report (5th) PT Tapani Nadenggan (PMSE, JLYE, LBLE) with PASS status where the document explains that there is FCL: 1,046.65 Ha and Environmental remediation: 183.48 (Riparian buffer zone).
- Email from RSPO (khing.suli@rspo.org) on 12 May 2021 stating that LUCA review report PT TN Kaltim 2 with the PASS status with summary of key findings FCL: 1,046.65 Ha and Environmental remediation: 183.48 (Riparian buffer zone).
- The company has sent Concept Notes to several companies under GAR, one of which is PT Tapani Nadenggan Kaltim 2 to the RSPO on 10 June 2021.
- An email from the RSPO (alicia@rspo.org) on 26 July 2021 stated that the RSPO Secretariat had conducted an initial review of the Concept Note and would request to respond to the review of the concept note.
- There was an email from the RSPO (alicia@rspo.org) on 8 September 2021 stating that the revised concept note had been reviewed and that some more clarification was needed.
- There was an email from the company (Wirendro Sumargo) on September 10, 2021, a response from the company regarding the response from the Concept Note Review.
- There was an email from the RSPO (rspocompensation@rspo.org) on 4 October 2021 stating that the revised concept note had been moved to the next stage with panel compensation and awaiting response from panel compensation.
- There was an email from the company (Wirendro Sumargo) on 11 November 2021 to the RSPO asking for the third concept note that had been sent to the RSPO but no response.
- There was an email from the RSPO (rspocompensation@rspo.org) on 11 November 2021 stating that the Concept Note had been sent to the compensation panel but was still pending due to several reasons.

- For PT Tapian Nadenggan (Bukit Subur Estate) the company has sent LUCA to RSPO and currently LUCA has not received PASS status from RSPO and is still LUCA Clarification status.
- There was an email from rspo (aryo.gustomo@rspo.org) on 18 February 2022 regarding the 2nd Advisory Note to CB on GAR's Certification and RaCP process stating that Conditional Approval would only be given for those Management Units that have been certified before to allow the Company to complete the RaCP process and continue the Annual Surveillance Assessment (ASA) and/or Recertification. And this will only be valid until the next 6 months from the date of this email. From time to time, we will review all the progress and status of the Certification and RaCP process for the particular certified management units, and we may revoke this conditional approval if any issues happen that may heavily threaten the integrity of RSPO standard requirements. The email also explained the stages of PT Tapian Nadenggan's RaCP Process, namely:
- Jakluay Mill (JLYM) PT Tapian Nadenggan (TN): Jakluay Estate, Pantun Mas Estate, and Long Buluh Estate status In Review Concept Note.
- Jakluay Mill (JLYM) PT Tapian Nadenggan (TN): Bukit Subur Estate status LUCA Clarification.
- In the 2nd Advisory Note to CB on GAR's Certification and RaCP process it was stated that Jakluay Mill (JLYM) PT Tapian Nadenggan (TN) Jakluay Estate, Pantun Mas Estate, and Long Buluh Estate and Jakluay Mill (JLYM) PT Tapian Nadenggan (TN): Bukit Subur Estate may proceed with follow-up audits, NC will remain open until the next ASA and management unit must provide updates on pending actions/clarifications to the RSPO Secretariat within the next 3 months.
- There was an email from the RSPO (wan.muqtadir@rspo.org) on 31 March 2023 stating that the RSPO Secretariat issued an exception regardless of the delay caused by the application process.

Dear Pak Hendi,

After discussion with the Assurance Director, the RSPO Secretariat is evaluating this case on the following merits
These are previously certified units which have been in the system and checked by the 3rd party auditors.

If there is any clearance undisclosed, RSPO deforestation alert through GIS team will be able to detect and will be in contact with GAR

GAR have actively involved in getting their compensation plan approved and currently at the last stage of the process

An advisory note and conditional approval had been issued previously

ASI will be alerted if there are inconsistencies with findings of the CBs and potentially mobilise compliance audits

However, in light of the above, the decision below has considered all the technicalities and consistency of data supplied by GAR and will be treated as case to case basis. This situation is also where both RSPO Secretariat and GAR have the lessons learnt. In the last ASC Meeting, Pak Agus Purnomo (the Co-Chair of ASC) mentioned that in order for the assurance system to be trusted, we have to reduce the need of the RSPO Secretariat issuing exceptions regardless of the delay caused by the process. At the same time, we acknowledge the gaps of the RaCP operation itself which we will in future engage with BHCWVG on this matter.

With that, please find below our decision in relation to continuity of certification for the listed units (refer to the last column Next Course of Action).

BSRE: concept note – not submitted, scope of certification must match with total hectareage disclosed. Once this is done concept note must be submitted before audit can continue with NC remain open until next surveillance/audit. This is indicator **7.12.8 NCR 2020.02 with Major Category.**

7.12.2

The unit of certification has identified protected areas and high conservation value areas. The identification results are listed in the HCV Assessment PT. Tapian Nadenggan – Unit Pantun Mas Estate, Pantun Mas Plasma, Jakluay Estate, Jakluay Plasma, Long Buluh Estate at Kutai Timur Regency, Kalimantan Timur Province in 2013. Also for Bukit Subur Plantation done 2013. The Scope of the HCV Study carried out is ±16,000 Ha (Location Permit). The study conducted by

PT SMART Tbk's HCV Identification Team.

The details of the HCV areas based on the HCV identification report are as follows:

- Jakluay Estate is an HCV area of 59.78 Ha, namely Pantun River.
- Long Buluh Estate is an HCV area of 316.76 Ha, namely Pantun River (146.09 Ha), Pantun Sub-River (62.38 Ha), and Long Buluh River (108.29 Ha).
- Pantun Mas Estate is an HCV area of 120.15 Ha, namely Pantun River (70.49 Ha), Pantun Sub-River (20.13 Ha) and Kongbeng River (29.53 Ha).
- Bukit Subur Estate HCV area covering 137.86 Ha, namely Krenyanyan River (72.86 Ha), Mendasar River (20.57 Ha), and Freshwater Swamp (44.43 Ha).

HCV Area Current Condition

The scope of HCV certification refers to HGU and the company's Cadastral Area is known for the total area of HCV areas are:

- Jakluay Estate with an area of 55.75 Ha
- Pantun Mas Estate with an area of 56.46 Ha
- Long Buluh Estate with an area of 227.36 Ha
- Bukit Subur Estate with an area of 41.92 Ha.
- Total: **381.49 Ha.**

Based on interviews with management representatives it is known that the entire protected area belongs to the planted area. This is due to the identification of protected areas after oil palm planting has been carried out. In addition, based on field visits to protected areas, namely in Block C25 Pantun River (Jakluay Estate), Block C29 Pantun River (Pantun Mas Estate), Block H19 Pantun River (Long Buluh Estate), and Block J13 Krenyanyan River is known that the border area has planted with oil palm. In addition, the company made efforts to check the river border areas by planting plants such as *Ulin*, *Guatemala* and *Meranti Putih*. All conservation areas owned by the company are in accordance with what is stated in the basic info.

7.12.3

Until now it is not relevant in Indonesia, so this indicator is not applicable in Indonesia until there is a further decision from the RSPO.

7.12.4

NPP management has been carried out by management, in its management the NPP management plan has been included in the HCV management plan.

The unit of certification has carried out activities in order to maintain protected areas and High Conservation Values which implemented in line according with the HCV management and monitoring plan period 2022, also reviewed periodically every 5 years involved consultation with relevant stakeholders such as villagers around.

- Primary and secondary animal monitoring
- Maintenance of protected animal warning boards
- Socialization to employees and the community around
- Maintenance of HCV boundary markers, attributes, and warning boards with a buffer zone/river border with a width of 50 m right and left along the river, as a spray boundary in the form of a cross
- Manual maintenance of *piringan* and *pasar pikul*.
- Rehabilitation of erosion prevention plants
- Training

7.12.5

Based on the video from the field visits and interviews with management, it was stated that there were no HCV areas that overlapped with local community rights.

7.12.6

Unit of Certification has a SOP for Management and Monitoring of High Conservation Values (Dok. No. SOP/SMART/BCOS-EHSD/SADV/I/002, dated July 1, 2014). The SOP aims to ensure that all management and monitoring activities of High Conservation Values also discuss the protection of rare and endangered wildlife. And the policy document for the Protection of Rare And Endangered Wildlife on June 25, 2015 which was legalized by the President Director of PT SMART Tbk. The protective measures set by the company are as follows:

- The company is committed to protecting and prohibiting the hunting of all types of wild animals that are included in the criteria for rare and endangered species that are in the plantation area
- The company will carry out continuous socialization and training activities on the protection of rare and endangered wild animals and their habitats to employees of contractor companies as well as to the community and other relevant stakeholders around the company.
- The company will investigate every case of violation and impose strict disciplinary sanctions (up to layoffs) to company employees who commit acts of hunting, maintaining, injuring, harming and killing endangered and endangered wildlife.
- For the handling of rare and endangered wildlife both inside and around its concession area, the company will cooperate with government agencies or related competent institutions
- The company is committed to evaluating and reporting on the company's performance based on this policy on a regular and open basis through the website and the company's annual sustainability report and continuously involving key stakeholders in the palm oil industry.

Based on Monitoring Species Report of PT Tapian Nadenggan in 2022, the results of the identification of flora and fauna within the company's are, using the latest protection regulations, namely Permen LHK Number 106 of 2018 which are within the company's area. For example; *Elanus Caeruleus*, *Acridotheres Javanicus*, *Macaca Fascularis*, and *Varanus Salavator*. This report is submitted to BKSDA Kalimantan Timur Province on a regular basis, e.g on 10 June 2022.

Based on the results of interviews with representatives of the village community, it is known that the community understands the existence of the HCV area and the presence of flora and fauna in the company area. The village community understands that the company protects the HCV area also for flora & fauna, and is aware of the protected fauna species, prohibitions on hunting, logging and burning forests. Respondents added that in addition to direct socialization, the company also installed warning boards or signboards marking HCV areas as well as prohibitions on environmental destruction which were an indirect form of socialization. Based on this explanation, it can be concluded that the company already has a plan and evidence of the implementation of socialization and is known by the surrounding community.

7.12.7

Unit of certification can show records of HCV management carried out in the period 2022. The results of the monitoring are used for follow-up improvements to the management plan, for example:

- Record of HCV Patrol Report with document No. F/SMART/BCOS-EHSD/SADV/002/014
- Record of HCV Attribute Monitoring Report (sign board, spray limit sign, HCV stake) with document No. F/SMART/BCOS-EHSD/SADV/002/019
- Records of Maintenance for the Rehabilitation of HCV Areas for *vertifier grass*, *Tanjung*, *Mahoni* and *Ketapang* with document No.F/SMART/BCOS-EHSD/SADV/002/013
- Monitoring Records of Animal and Plant Species (primer and secondary) with document No.F/SMART/BCOS-EHSD/SADV/002/021.

The certification unit has a continuous action to improve the management plan resulting from the report on Identification of High Conservation Values (HCV) document as an effort to improve the quality of HCV management and monitoring activities in accordance with the recommendations, including by:

- Make documentation of each management and monitoring activity as evidence of activities and complement the reporting file.
- Conduct more intense monitoring of species from the class of mammals, reptiles and amphibians so as to allow for additional species.

- Repair damaged attributes in accordance with the existing management plan, because some attribute locations have started to break down.
- For invasive species (leguminous plants) in the HCV area there must be a report on the exotic plant inventory, accompanied by documentation. If there are no exotic plants in the HCV area, an inventory report must still be made.
- Provide socialization and direct monitoring of replanting activities in blocks where rivers are included in HCVs.

7.12.8	Status: NCR No. 2020.01 with Major Category.	
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3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and logo from Certification Body which submitted by Client	X or √
ASA-1.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product). PT SMART Tbk (Parent Company: Golden Agri Resources Ltd) Trademark License Number RSPO-1-0096-11-100-00	✓
	Status: Comply	
2.	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use	X or √
ASA-1.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product). PT SMART Tbk (Parent Company: Golden Agri Resources Ltd) Trademark License Number RSPO-1-0096-11-100-00	✓
	Status: Comply	
3.	Implementation of Certificate and Logo is not used on product	X or √
ASA-1.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product). PT SMART Tbk (Parent Company: Golden Agri Resources Ltd) Trademark License Number RSPO-1-0096-11-100-00	✓
	Status: Comply	
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or √
ASA-1.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product). PT SMART Tbk (Parent Company: Golden Agri Resources Ltd) Trademark License Number RSPO-1-0096-11-100-00	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification

Compliance of the uncertified management units of Golden Agri-Resources, 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.

Golden Agri-Resources, Ltd Time Bound Plan (TBP) is explained in table 1.5. Golden Agri-Resources run forty nine (49) mills and one hundred and eighty (180) estates (own and smallholders) in Indonesia and has achieved RSPO certified for thirty one (31) mills and supply base in Indonesia. Golden Agri-Resources, Ltd has informed the TBP progress, MUTU has considered that Golden Agri-Resources, Ltd is comply with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Golden Agri-Resources, Ltd on 27 January 2023 made by Head of Operations Sustainability.

MUTU has verified partial certification for uncertified unit's subsidiary of Golden Agri-Resources, Ltd based on their Time Bound Plan. There are eighteen (18) uncertified management unit of GAR. 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 followed RSPO requirements regarding the New Planting Procedure and Remediation and Compensation Procedure.
- There is no labor disputes that are not resolved through an agreed process.
- All plantations established since 2005 have been carried out in accordance with applicable laws in the country and there is no evidence of non-compliance with the law in any of the non-certified holdings that have not been declared above.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company Group/Holding Statement: The company has carried out a Compliance Audit / Internal Compliance Verification (ICV) to see compliance with RSPO standards and also the Set up System in the Company's units to be certified.</p> <p>There are Compliance Audit (ICV) reports for each company including:</p> <ol style="list-style-type: none"> 1. PT Sawitakarya Manunggul – Sawita Mill : Pre Audit 2015, Compliance Audit 24 - 31 May 2021 2. PT Smart Tbk – Bukit Kapur Mill: Pre Audit 2015, Compliance Audit 15 November 2021 3. PT Sinar Kencana Inti Perkasa – Kasuari Mill: Pre Audit 2015, Compliance Audit 11 October 2021 4. PT Agrolestari Mandiri – Pekawai Mill: Pre Audit 2015, Compliance Audit 01 March 2021 5. PT Binasawit Abadi Pratama – Perdana Mill: 14 June 2021 6. PT Agrokarya Prima Lestari – Kuayan Mill: Pre Audit 2014, Compliance Audit 13 September 2021 7. PT Mitrakarya Agroindo – Tangar Mill: Pre Audit 2015, Compliance Audit 27 September 2021 8. PT Paramita Internusa Pratama – Belian Mill: Pre Audit 2015, Compliance Audit 28 June 2021 9. PT Kresna Duta Agroindo – Rantau Panjang Mill: Compliance Audit 01 November 2021

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>10. PT Kresna Duta Agroindo – Gunung Kombeng Mill: Compliance Audit 15 February 2021</p> <p>11. PT Sawit Mas Sejahtera – Sungai Kikim Mill: <i>Setup System</i>. Compliance Audit 20 September 2021</p> <p>12. Sinar Kencana Inti Perkasa – Sungai Magalau Mill: Compliance Audit 25 October 2021.</p> <p>13. PT Bahana Karya Semesta – Sungai Air Jernih Mill: Compliance Audit 6 December 2021</p> <p>14. PT Bangun Nusa Mandiri – Kenari Mill: Compliance Audit 4 October 2021.</p> <p>15. PT Agrolestari Sentosa – Jalemo Mill: Compliance Audit 11 October 2021</p> <p>16. PT Adi Tunggal Mahajaya – Sako Mill: Compliance Audit 8 November 2021.</p> <p>Auditor Verification: Internal Audit report available for uncertified management unit:</p> <ol style="list-style-type: none"> 1. PT Sawitakarya Manunggul (Sawita Mill and supply base) compliance audit on 24 - 31 May 2021. 2. PT SMART (Bukit Kapur Mill and supply base) compliance audit on 15 November 2021. 3. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base) compliance audit on 11 October 2021. 4. PT Agrolestari Mandiri (Pekawai Mill and supply base) compliance audit on 01 March 2021. 5. PT Binasawit Abadi Pratama (Perdana Mill and supply base) compliance audit on 14 June 2021. 6. PT Agrokarya Prima Lestari (Kuayan Mill and supply base) compliance audit on 13 September 2021. 7. PT Mitra Karya Agroindo (Tangar Mill and supply base) compliance audit on 27 September 2021. 8. PT Paramitra Internusa Pratama (Belian Mill and supply base) compliance audit on 28 June 2021. 9. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base) compliance audit on 01 November 2021. 10. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base) compliance audit on 15 February 2021. 11. PT Sawit Mas Sejahtera (Sungai Kikim and supply base) compliance audit on 20 September 2021. 12. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base) compliance audit on 25 October 2021. 13. PT Bahana Karya Semesta (Sungai Air Jernih Mill and supply base) compliance audit on 6 December 2021. 14. PT Bangun Nusa Mandiri (Kenari Mill and supply base) compliance audit on 4 October 2021. 15. PT Agro Lestari Sentosa (Jalemo Mill and supply base) compliance audit on 11 October 2021. 16. PT Adi Tunggal Mahajaya (Sako Mill and supply base) compliance audit on 8 November 2021.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Then there will be additional units in 2022 with the acquisition by GAR of 2 mills and 16 Estates (11 own estates and 5 estate plasma/KKPA). Internal audit activities have not yet been carried out, but prior to the acquisition of these units, GAR has carried out a due diligence or internal assessment so that it can be decided to be acquired by GAR and the internal audit plan to be carried out on these units can be shown, with details as follows:</p> <ol style="list-style-type: none"> 1. PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA with an internal audit plan on 17 May 2022. 2. PT Harapan Rimba Raya: Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA with an internal audit plan on 17 May 2022. 3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA with an internal audit plan on 17 May 2022. 4. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be the supply base of Bukit Perak Mill (PT Bumi Permai Lestari) that has been certified with an internal audit plan on 28 March 2022. 5. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be the supply base of Bukit Perak Mill (PT Bumi Permai Lestari) that has been certified with an internal audit plan on 28 March 2022. 6. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be the supply base of Bumipalma Mill (PT Bumipalma Lestari Persada) that has been certified with an internal audit plan on 8 August 2022. 7. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be the supply base of Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa) with an internal audit plan on 7 November 2022. <p><i>Notes:</i> <i>Verification of the realization of the internal audit carried out on the newly acquired units will be carried out at the nearest RSPO surveillance audit activity with the internal audit schedule that has been set.</i></p> <p>The company has carried out a Compliance Audit / Internal Compliance Verification (ICV) to see compliance with RSPO standards and also the Set up System in the Company's units to be certified.</p> <p>There are Compliance Audit (ICV) reports for each company including:</p> <ol style="list-style-type: none"> 1. PT. Agrolestari Mandiri – Pekawai Mill: Compliance Audit 07 February 2022 2. PT. Kresna Duta Agrindo – Gunung Kombeng Mill: Compliance Audit 21 February 2022

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ol style="list-style-type: none"> PT. Harapan Rimba Raya – Sungai Kedang Mill: Compliance Audit 17 May 2022 PT. Kruing Lestari Jaya – Sungai Perak Mill: Compliance Audit 23 May 2022 PT. Kresna Duta Agrindo – Rantau Panjang Mill: Compliance Audit 06 June 2022 PT. Sawitakarya Manunggal – Sawita Mill: Compliance Audit 13 June 2022 PT. Binasawit Abadi Pratama – Perdana Mill: Compliance Audit 20 June 2022 PT. Paramitra Internusa Pratama – Belian Mill: Compliance Audit 26 June 2022 PT. Bahana Karya Semesta – Sungai Air Jernih Mill: Compliance Audit 03 October 2022 PT. Sawit Mas Sejahtera – Sungai Kikim Mill: Compliance Audit 03 October 2022 PT. Sinar Kencana Inti Perkasa – Kasuari Mill: Compliance Audit 03 October 2022 PT. Sinar Kencana Inti Perkasa – Demta Bulking: Compliance Audit 06 October 2022 PT. Aditunggal Mahajaya - Sako Mill: Compliance Audit 14 November 2022 PT. Agrolestari Sentosa – Jalemo Mill: Compliance Audit 21 November 2022 PT. Mitrakarya Agroindo – Tangar Mill: Compliance Audit 05 December 2022 PT. Agrokarya Prima Lestari – Kuayan Mill: Compliance Audit 05 December 2022 PT. Sinar Kencana Inti Perkasa – Sungai Magalau Mill: Compliance Audit 12 December 2022 PT. SMART - Bukit Kapur Mill: Compliance Audit 12 December 2022 <p>2.0 <i>Auditor Verification:</i></p> <p>3.0 Internal Audit report available for uncertified management unit:</p> <ol style="list-style-type: none"> PT. SMART - Bukit Kapur Mill: Compliance Audit 12 December 2022 PT. Agrolestari Sentosa – Jalemo Mill: Compliance Audit 21 November 2022 PT. Binasawit Abadi Pratama – Perdana Mill: Compliance Audit 20 June 2022 PT. Aditunggal Mahajaya - Sako Mill: Compliance Audit 14 November 2022 PT. Mitrakarya Agroindo – Tangar Mill: Compliance Audit 05 December 2022 PT. Kruing Lestari Jaya – Sungai Perak Mill: Compliance Audit 23 May 2022 PT. Bangun Nusa Persada – Kenari Mill: Compliance Audit 19 September 2022

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>In 2022, GAR has made additional units by acquiring 4 factories namely Sungai Perak Mill, Sungai Kedang Mill, Bukit Perak Mill, Bumi Palma Mill and 15 plantations (11 own plantations namely Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Pahu Estate, Bukit Permai Estate, Bukit Lestari Estate, Kharisma Estate and 4 plasma plantations/KKPA namely Sungai Pikan Plasma, Sungai Tohan Plasma, Sungai Pahu Plasma, Kharisma Plasma).</p> <p>Internal audit activities have been carried out, as follows:</p> <ol style="list-style-type: none"> 1. PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA with an internal audit on 17 May 2022. 2. PT Harapan Rimba Raya : Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA with an internal audit on 17 May 2022. 3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA with an internal audit on 17 May 2022. 4. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be the supply base of Bukit Perak Mill (PT Bumi Permai Lestari) that has been certified with an internal audit on 28 March 2022. 5. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be the supply base of Bukit Perak Mill (PT Bumi Permai Lestari) that has been certified with an internal audit on 28 March 2022. 6. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be the supply base of Bumipalma Mill (PT Bumipalma Lestari Persada) that has been certified with an internal audit on 8 August 2022. 7. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be the supply base of Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa) with an internal audit on 7 November 2022.
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 7.12	<p>Company Group/Holding Statement: Several companies under GAR were planted above November 2005, while the HCV assessment process was conducted in the period 2010 – 2013.</p> <p>GAR and its subsidiaries carried out a Remediation and Compensation (RaCP) procedure beginning with Disclosure and Zero Liability reporting to the RSPO via email on 29 August 2014.</p> <p>From 25 companies, 7 of them are certified units, the remaining 18 companies are uncertified units. The following is an update on the RaCP progress as of 11 January 2022 for uncertified units:</p> <ol style="list-style-type: none"> a) 4 companies have received Concept Note approval from RSPO dated 27 July 2020, namely:

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ol style="list-style-type: none"> 1. PT Kencana Graha Permai (Delima Estate) – Kalimantan Barat 2. PT Agrolestari Sentosa – Kalimantan Tengah 3. PT Sumber Indah Perkasa – Papua 4. PT Kresna Duta Agroindo – Kalimantan Timur <p>The company submitted a new Concept Note in collaboration with a third party (PT Lestari Capital). Concept Note Batch 1 includes companies:</p> <ol style="list-style-type: none"> 1. PT Kencana Graha Permai (Delima Estate) – Kalimantan Barat 2. PT Sumber Indah Perkasa – Papua 3. PT Kresna Duta Agroindo – Kalimantan Timur <p>The latest progress on the revised Concept Note was submitted on 14 January 2022 and is currently still being reviewed by the RSPO Compensation Panel.</p> <p>The company also made the Concept Note Project Batu Menangis for PT Agrolestari Sentosa – Kalimantan Tengah, was submitted on 16 December 2021 to RSPO Compensation Panel.</p> <p>b) The LUCA (Land Use Change Analysis) report which is still in the RSPO review process:</p> <ol style="list-style-type: none"> 1. PT Kartika Prima Cipta – Kalimantan Barat 2. PT Agrolestari Mandiri – Kalimantan Barat <p>c) The LUCA (Land Use Change Analysis) report is in the process of being revised and will be sent to the RSPO:</p> <ol style="list-style-type: none"> 1. PT Cahaya Nusa Gemilang – Kalimantan Barat 2. PT Paramitra Internusa Pratama – Kalimantan Barat 3. PT Bangun Nusa Mandiri – Kalimantan Barat 4. PT Persada Graha Mandiri – Kalimantan Barat 5. PT Satya Kisma Usaha (Medan Sari Estate) – Kalimantan Tengah 6. PT Binasawit Abadi Pratama – Kalimantan Tengah 7. PT Aditunggal Mahajaya – Kalimantan Tengah 8. PT Mitrakarya Agroindo – Kalimantan Tengah 9. PT Agrokarya Primaestari – Kalimantan Tengah 10. PT Buana Adhitama – Kalimantan Tengah 11. PT Sinar Kencana Inti Perkasa – Kalimantan Selatan 12. PT Sawita Karya Manunggul – Kalimantan Selatan <p>d) The LUCA (Land Use Change Analysis) report has been approved is PT Satya Kisma Usaha (Batang Gading Estate) – Jambi.</p> <p>The LUCA report proposed to be hold/postponed until the Integrated HCV HCS Report obtains Satisfactory status from the HCVRN, is PT Sawit Mas Sejahtera – Sumatera Selatan (2 reports).</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>HCV assessments for 17 reports was conducted in the period of 2010 to 2018 by external (consultant) and internal parties. The HCV assessment is carried out by a team assessor with a Team Leader who has been approved by the RSPO. The reference for the HCV assessment using the HCV Toolkit 2008. The peer review is carried out by an independent consultant who has also been approved by the RSPO.</p> <p>Assessment of PT Sawit Mas Sejahtera – Sumatera Selatan has used Integrated HCV-HCS with the consultants who have been licensed in HCVN and HCSA</p> <p>The company continues to follow up on the RaCP process, so that the RSPO timebound for uncertified units can be realized immediately.</p> <p>In the 2021 period, several companies were acquired by GAR according to the notarial deed of amendment dated 04 August 2021, including:</p> <ol style="list-style-type: none"> 1. PT Kruing Lestari Jaya 2. PT Harapan Rimba Raya 3. PT Rimbaraya Tamajaya 4. PT Agrolestari Subur Sejahtera 5. PT Agrolestari Hijau Sentosa 6. PT Kharisma Riau Sentosa Prima 7. PT Mitranusa Permata <p>The company is still collecting information and documentation regarding the fulfillment of RaCP obligations for the newly acquired company. The timeline that has been prepared for the fulfillment of this RaCP is:</p> <ul style="list-style-type: none"> • Submission of Disclosure and LUCA on semester 1 of 2022 • Submission of Concept Notes on Semester 2 of 2022 • Approval RaCP Proposal on Semester 1 of 2023 <p>For the RaCP process, smallholders scheme will be adjusted to the 2023 timebound along with the new acquisition company.</p> <p>Auditor Verification:</p> <p>Based on auditor verification, not all uncertified unit conduct new clearing after Nov 2005, but for uncertified unit with land clearing after Nov 2005 has follow RaCP. Detail information of uncertified unit are:</p> <ol style="list-style-type: none"> 1. PT Kencana Graha Permai - Kalimantan Barat (Delima Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted a new Concept Note in collaboration with PT Lestari Capital on 14 January 2022, and is currently still being reviewed by the RSPO Compensation Panel. 2. PT Agrolestari Sentosa – Kalimantan Tengah (Jalemo Estate, Manuhing Estate, Kajui Estate) concept note get

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>approval from RSPO on 27 July 2020. However, the company submitted the Concept Note Project Batu Menangis on 14 January 2022 and is currently still being reviewed by the RSPO Compensation Panel.</p> <p>3. PT Sumber Indah Perkasa – Papua (Mambruk Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted a new Concept Note in collaboration with PT Lestari Capital on 14 January 2022, and is currently still being reviewed by the RSPO Compensation Panel.</p> <p>4. PT Kresna Duta Agroindo – Kalimantan Timur (Gunung Kombeng Mill, Rantau Panjang Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted a new Concept Note in collaboration with PT Lestari Capital on 14 January 2022, and is currently still being reviewed by the RSPO Compensation Panel</p> <p>5. PT Kartika Prima Cipta – Kalimantan Barat (Muara Tawang Estate), the LUCA report which is still in the RSPO review process.</p> <p>6. PT Agrolestari Mandiri – Kalimantan Barat (Pekawai Mill and supply bases), the LUCA report which is still in the RSPO review process.</p> <p>7. PT Cahaya Nusa Gemilang – Kalimantan Barat (Kenanga Estate), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>8. PT Paramitra Internusa Pratama – Kalimantan Barat (Belian Mill, Belian Estate and Tengawang Estate), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>9. PT Bangun Nusa Mandiri – Kalimantan Barat (Kenari Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>10. PT Persada Graha Mandiri – Kalimantan Barat (Kapuas Hulu Estate and Sungai Beran Estate), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>11. PT Satya Kisma Usaha – Kalimantan Tengah (Medan Sari Estate), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>12. PT Binasawit Abadi Pratama – Kalimantan Tengah (Perdana Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>13. PT Aditunggal Mahajaya – Kalimantan Tengah (Sungai Ayawan Estate), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>14. PT Mitrakarya Agroindo – Kalimantan Tengah (Tangar Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>15. PT Agrokarya Primaestari – Kalimantan Tengah (Kuayan Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>16. PT Buana Adhitama – Kalimantan Tengah (Sairi Estate and Bukit Dua Estate), LUCA report is in the process of being revised and will be sent to the RSPO.</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>17. PT Sinar Kencana Inti Perkasa – Kalimantan Selatan (Sungai Magalau Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>18. PT Sawita Karya Manunggul – Kalimantan Selatan (Sawita Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO</p> <p>19. PT Satya Kisma Usaha – Jambi (Batang Gading Estate), the LUCA report has been approved in 12 November 2021.</p> <p>20. PT Sawit Mas Sejahtera – Sumatera Selatan, the LUCA report proposed to be hold/postponed until the Integrated HCV HCS Report obtains Satisfactory status from the HCVRN.</p> <p>21. The companies were acquired by GAR on 2021 are PT Kruing Lestari Jaya (Sungai Perak Mill and supply bases), PT Harapan Rimba Raya (Sungai Kedang Mill and supply bases), PT Rimbaraya Tamajaya (Sungai Pahu Estate), PT Agrolestari Subur Sejahtera (Bukit Permai Estate), PT Agrolestari Hijau Sentosa (Bukit Lestari Estate), PT Kharisma Riau Sentosa Prima (Kharisma Estate), PT Mitranusa Permata (Sungai Manunggul Estate). The company is still collecting information and documentation regarding the fulfillment of RaCP obligations.</p> <p>22. PT. Agrolestari Sentosa – Kalimantan Tengah (Jalemo Mill and supply bases). The concept note was submitted on 22 September 2022 and is currently being reviewed by the RSPO</p> <p>23. PT. Binasawit Abadi Pratama – Kalimantan Tengah (Perdana Mill and Supply Bases). LUCA was submitted to the RSPO on 18 April 2018, feedback from RSPO on October 14 2021 and is currently still in the process of land cover verification by the company.</p> <p>24. PT. Aditunggal Mahajaya – Kalimantan Tengah (Sako Mill and supply bases). LUCA report PT. Agrokarya Prima Lestari and PT. Aditunggal Mahajaya is still in the review process and is currently preparing its clarification for resubmission (2nd resubmission). As for the status of the LUCA report of PT. Mitrakarya Agroindo with Pass status on 10 June 2022.</p> <p>25. PT. Mitrakarya Agroindo – Kalimantan Tengah (Tangar Mill dan supply bases), stages in the RaCP process have not been fully completed</p> <p>26. PT. Kruing Lestari Jaya – Kalimantan Timur (Sungai Perak Mill dan supply bases), RaCP disclosure has not been made to the RSPO</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement:</p> <p>GAR and its subsidiaries planted after January 2010. There are companies that had conducted the RSPO New Planting Procedure (NPP) and have gone through a 30-day public consultation process in April 2014. These companies include:</p> <ol style="list-style-type: none"> 1. PT Satya Kisma Usaha – Jambi 2. PT Kresna Duta Agroindo – Kalimantan Timur 3. PT Mitra Karya Agroindo – Kalimantan Tengah 4. PT Binasawit Abadi Pratama – Kalimantan Tengah

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ol style="list-style-type: none"> 5. PT Aditungal Mahajaya – Kalimantan Tengah 6. PT Agrolestari Sentosa – Kalimantan Tengah 7. PT Agrokarya Primalestari – Kalimantan Tengah 8. PT Buana Adhitama – Kalimantan Tengah 9. PT Agrolestari Mandiri – Kalimantan Barat 10. PT Paramitra Internusa Persada – Kalimantan Barat 11. PT Persada Graha Mandiri – Kalimantan Barat 12. PT Bangun Nusa Mandiri – Kalimantan Barat 13. PT Kartika Prima Cipta – Kalimantan Barat 14. PT Kencana Graha Permai – Kalimantan Barat 15. PT Cahaya Nusagemilang – Kalimantan Barat <p>Auditor Verification: Based on auditor verification, not all uncertified unit conduct new clearing after January 2010 but for all uncertified unit with land clearing after January 2010 has follow NPP. Detail information of uncertified unit are:</p> <ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base): there is no new land clearing after January 2010 2. PT Agrolestari Mandiri (Pekawai Mill and supply base): NPP on 26 April 2014 3. PT Binasawit Abadi Pratama (Perdana Mill and supply base): NPP on 8 July 2014 4. PT Agrokarya Prima Lestari (Kuayan Mill and supply base): NPP on 26 April 2014 and PT Buana Adhitama (supply base) conduct NPP on 4 June 2014. 5. PT Mitra Karya Agroindo (Tangar Mill and supply base): NPP on 26 April 2014 6. PT Paramitra Internusa Pratama (Belian Mill and supply base): NPP on 3 June 2014, PT Kartika Prima Cipta (supply base) conduct NPP on 8 July 2014 and PT Persada Graha Mandiri (Supply base) conduct NPP on 6 June 2014. 7. PT Sawit Mas Sejahtera (Sungai Kikim and supply base): there is new planting after January 2010 in Sungai Kikim Estate and Sungai Saling Estate, the company not conduct NPP. This is become subject of sanction. For PT Buana Sawit Mas (supply base) conduct NPP on 8 July 2014. 8. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base): there is no new land clearing after January 2010. 9. PT Agro Lestari Sentosa (Jalemo Mill and supply base): NPP on 26 April 2014 10. PT Adi Tunggal Mahajaya (Sako Mill) (under construction): NPP on 25 April 2014, PT Agrokarya Prima Lestari (supply base) conduct NPP on 26 April 2014 and PT Mitra Karya Agroindo (supply base) conduct NPP on 26 April 2014. 11. PT SMART (Bukit Kapur Mill and supply base): there is no new land clearing after January 2010. 12. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base): NPP on 8 July 2014. 13. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		base): NPP on 8 July 2014. 14. PT Sawitakarya Manunggul (Sawita Mill and supply base): there is new land clearing after January 2010 in Sawita KKPA and company not conduct NPP. This is become subject of sanction.
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 P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8	<p>Company Group/Holding Statement: No land conflicts. The company has a land conflict resolution mechanism in accordance with the RSPO criteria 4.2, 4.6, 4.7 and 4.8. This procedure is contained in the SOP for handling social conflicts with the registration number SOP/SMART/SCRD/NSDV/I/002 revision 1 dated 18 May 2016 and SOP for Handling Complaints and Dissatisfaction no SOP/SMART/GIMSSCMD/USDV/I/001 revision 2 dates April 11, 2017. This procedure regulates mutually agreed upon social conflict resolution. Conflict resolution can be done in a participatory manner and can also be done with a third party (mediator).</p> <p>The company also has a procedure for handling complaints before they develop into conflict. The process in question is SOP/SMART/GIMS-SCMD/USDV/I/001 revision 2 dated 11 April 2017, handling complaints appropriately and quickly. GAR has initiated to become a member of the RSPO DSF as a "Grower" category.</p> <p>Here recap of complaint progress related to GAR which publish in RSPO Website:</p> <ol style="list-style-type: none"> 1. Complaint dated July 11, 2021 to PT SMART Tbk (West Kalimantan Region) regarding the alleged purchase/supply of fresh fruit bunches (FFB) and crude palm oil (CPO) from PT Kapuasindo Palm Industri (PT KPI), a subsidiary of the Kencana Group (not members of the RSPO), who have committed a series of violations against workers and indigenous peoples in the district. Last Status RSPO Complaints Panel has issued a decision letter regarding the complaint on 17 January 2022 in which it was decided to terminate the entire complaint. The decision letter has been submitted to both parties, and time is given if anyone wishes to appeal until April 11, 2022. (RSPO Complaint Panel Decision is attached). 2. Complaint on 2 March 2020 to GAR (Central Kalimantan Region) from Forest Peoples Program & Elk Hills Research regarding alleged land legality and bribery cases. On the part of GAR itself, GIS-2 analysis for land clearance alerts after November 2014 from discussions with RSPO GIS manager on 21 May 2021 has agreed on the sampling method. GAR's clarification report was sent on September 8, 2021. As for the legal review on anti-bribery policies & practices, the company rejected the ToR for Legal Review on March 26, 2021. Until now the company is still waiting for a further decision from the RSPO. The latest status is as of December 15, 2021, the

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>RSPO is waiting for the results of a review from the consultant.</p> <p>3. Complaint on 19 October 2018 to GAR (Kapuas Hulu Region, West Kalimantan) from the Forest Peoples Program (FPP) & Transformasi Untuk Keadilan – Indonesia (TUK-I) regarding legality. On 26 August 2021, the RSPO Complaint Panel decided to proceed with further investigations. The investigation carried out will be fully funded by the RSPO, and carried out by PROFUNDO Parties. Until now the company is still waiting for a further decision from the RSPO. The latest status is as of December 6, 2021, the RSPO is waiting for the results of a review from the consultant.</p> <p>4. Complaint on 13 October 2014 to PT Kartika Prima Cipta (West Kalimantan) from Forest Peoples Program (FPP) & Transformasi Untuk Keadilan – Indonesia (TUK-I) regarding the FPIC process and 6 other issues. RSPO with the approval of GAR and FPP divides the conflict resolution verification process into 5 phases (phase 1 related to NPP, maximum land holding and new land development, phase 2 related to legality, phase 3 related to smallholders, phase 4 related to FPIC and phase 5 related to HCV), where GAR has responded to phase 5 on 26 August 2021. The information submitted has responded to all stages and GAR is currently waiting for a decision from the RSPO Complaint Panel. The latest status as of 15 December 2021, the RSPO Complaint Panel has reached a decision for phase 2 and is awaiting discussion of phases 3 and 4.</p> <p>5. The results of the Compliance Audit conducted for the 2021 period in the uncertified unit that there was no land conflict and the unit had disseminated the SOP for Handling Complaints and Dissatisfaction, Human Rights Policy and SOP for Handling Social Conflicts both internally and externally, in general the FPIC process has been carried out according to procedures, so that there are no land or social conflicts.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There is no land conflicts in the following uncertified management unit:</p> <ol style="list-style-type: none"> 1. PT Sawitakarya Manunggul (Sawita Mill and supply base) 2. PT SMART (Bukit Kapur Mill and supply base) 3. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base) 4. PT Agrolestari Mandiri (Pekawai Mill and supply base) 5. PT Binasawit Abadi Pratama (Perdana Mill and supply base) 6. PT Agrokarya Prima Lestari (Kuayan Mill and supply base) 7. PT Mitra Karya Agroindo (Tangar Mill and supply base). 8. PT Paramitra Internusa Pratama (Belian Mill and supply base) 9. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base).

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>10. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base).</p> <p>11. PT Sawit Mas Sejahtera (Sungai Kikim and supply base)</p> <p>12. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base)</p> <p>13. PT Bahana Karya Semesta (Sungai Air Jernih Mill and supply base)</p> <p>14. PT Bangun Nusa Mandiri (Kenari Mill and supply base)</p> <p>15. PT Agro Lestari Sentosa (Jalemo Mill and supply base)</p> <p>16. PT Adi Tunggal Mahajaya (Sako Mill and supply base)</p> <p>17. PT Kruing Lestari Jaya (Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA)</p> <p>18. PT Harapan Rimba Raya (Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA).</p> <p>19. PT Rimbaraya Tamajaya (Sungai Pahu Estate and Sungai Pahu KKPA), which will be supply base for Sungai Kedang Mill.</p> <p>20. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be the supply base of Bukit Perak Mill that has been certified</p> <p>21. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be the supply base of Bukit Perak Mill that has been certified</p> <p>22. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be the supply base of Bumipalma Mill that has been certified</p> <p>23. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be the supply base of Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa).</p> <p>Based on the auditor's search through news from the internet, no information on land conflicts was found in the above uncertified management unit. However, on the RSPO website (Complaint Panel) there is information about complaints from various stakeholders against GAR and this has been explained by the company regarding the progress of the settlement as described above.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. Based on information from electronic media on March 1, 2022, there was information that PT. Agro Lestari Sentosa for not building plasma plantations for the community. Based on confirmation with representatives of PT. Agro Lestari, it is known that the plasma area is still in the NPP process and the target is to complete the NPP by the end of the 2023 quarter.</p> <p>In addition, based on electronic media on December 13, 2022, there is information on problems between Koperasi Perkebunan</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Bataduh Raya and PT. Bangun Nusa Mandiri. Based on confirmation with representatives of PT. Bangun Nusa Mandiri is known that there have been 15 agreements between cooperatives and companies, including PT. BNM is committed to building a plasma of 557.47 Ha and developing an area of 180 Ha for partnerships. Regarding overlapping land, the solution is <i>Vaicias</i> Data, namely the handover of land in PT. BNM with the Head of the Village and Koperasi Perkebunan Bataduh Raya</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 4.2	<p><i>Company Group/Holding Statement:</i> The company has a procedure for handling employee complaints before becoming into conflicts. The procedure is SOP/SMART/SCRD/NSDV/II/002 revision 1 dated 18 May 2016.</p> <p>Procedures related to employee complaints are regulated in the internal flow of form because employees are included in the category of internal stakeholders. The media of complaint used is an official letter submitted through the worker union or put in the suggestion box provided in strategic locations.</p> <p>During 2021, there were no new complaints regarding employment through the RSPO website, as for the progress of previous complaints, they have closed status.</p> <p><i>Auditor Verification:</i> There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>There is no list of employee and stakeholder complaint and grievance.</p> <p><i>Auditor Verification:</i> There is information from electronic media on November 24, 2021, it is known that there was mediation by the Head of the Central Seruyan Sector Police regarding the termination of employment of one of the employees of PT. Adi Tunggal Mahajaya. As for the demands submitted, namely the issue of compensation for work termination that was not provided by the company and the 2014 CSR agreement, namely related to clean water, local workers, agriculture, fish ponds, health, transportation cooperation agreements and receipt of FFB from the community, as well as CPO transport SPK from the community. Based on confirmation with PT. Adi Tunggal Mahajaya, it is known that the employee has the status of a contract employee/PKWT for 1 year and is not renewed because he does not meet the competency requirements. In addition, based on labor regulations after the UUCK was issued, companies are no longer obliged to provide compensation to workers whose contracts have been terminated. The realization of CSR is carried out in stages and this demand is the program of the previous Village Head.</p> <p>In addition, there was an issue in the electronic news on September 30 2022 that there was an employee who had died</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		who had been abandoned by PT. Kruing Lestari Jaya and their rights are not fulfilled. However, there is information from the management of the Ikentim organization that there was no abandonment of the corpse. This is in accordance with confirmation from the management representative of PT. Kruing Lestari Jaya that the company has facilitated the corpse to be delivered and buried in Resak according to the wishes of the family
2.1.6	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1	<p>Company Group/Holding Statement: Companies comply with the regulations in accordance with the requirements of the RSPO 2.1 where there is no violation of the rules that are relevant to the plantation. The company has a mechanism to evaluate compliance with regulations, namely SOP/SMART/UMUM/SADV/I/002. In SOP describes procedures for compliance, completeness and groove sections which explain in detail to evaluate compliance with the legislation.</p> <p>Subsidiaries of GAR which still on going to process HGU consist of:</p> <ol style="list-style-type: none"> 1. PT Djuandasawit Lestari (Muara Kandis Estate & Muara Tawas Estate) 2. PT Sawit Mas Sejahtera (Sawit Mas Estate) 3. PT Bumi Sawit Permai (Bumi Sawit Estate) 4. PT Forestralestari Dwikarya (Tanjung Rusa Estate) 5. PT Sumber Indah Perkasa (Sungai Buaya Estate, Sungai Merah Estate) 6. PT Ivo Mas Tunggal (Samsam Estate, Ujung Tanjung Estate, Sei Rokan Estate, Nenggala Estate) 7. PT Buana Wiralestari Mas (Kijang Estate, Nagamas Estate, Nagasakti Estate) 8. PT Ramajaya Pramukti (Ramarama Estate) 9. PT Binasawit Abadipratama (Perdana Estate, Lenggana Estate, Semandau Estate, Muara Dua Estate) 10. PT Agrokarya Prima Lestari (Muara Tawang Estate, Kuayan Estate, Bukit Sentuhai Estate, Tajur Beras Estate, Seranau Estate) 11. PT Buana Adhitama (Sapiri Estate) 12. PT Agrolestari Sentosa (Manuhing Estate, Kajui Estate) 13. PT Mitra Karya Agroindo (Sungai Nusa Estate) 14. PT Aditunggal Mahajaya (Sungai Ayawan Estate) 15. PT Satya Kisma Usaha (Medang Sari Estate) 16. PT Buana Adhitama (Bukit Dua Estate) 17. PT Agrolestari Sentosa (Jalemo Estate) 18. PT Binasawit Abadipratama (Perdana Mill) 19. PT Agrokarya Prima Lestari (Kuayan Mill) 20. PT Mitrakarya Agroindo (Tangar Mill) 21. PT Agrolestari Sentosa (Jalemo Mill) 22. PT Adi Tunggal Mahajaya (Sako Mill) 23. PT Smart Tbk. (Sungai Cantung Estate, Bukit Kapur Estate, Bukit Kapur Mill) 24. PT Bangun Nusa Mandiri (Gaharu Estate, Kenari Estate, Kenari Plasma, Gahari Plasma, Kenari Plasma)

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Beside that, there are some unit still on process the land certificate (SHM) consist of:</p> <ol style="list-style-type: none"> 1. PT Kresna Duta Agroindo – Gunung Kombeng Mill (Gunung Kombeng Plasma) 2. PT Ramajaya Pramukti (Ramarama Plasma) 3. PT Satya Kisma Usaha – Sungai Bengkal Mill (Kilis Plasma) 4. PT Agrokarya Prima Lestari (Sungai Sambon Plasma) 5. PT Djundasawit Lestari (Pandawa Plasma) 6. PT Foresta Lestari Dwikarya (Tanjung Rusa Plasma) 7. PT Palmindo Biliton Berjaya (Tanjung Sawit Plasma) 8. PT Sinar Kencana Inti Perkasa (Sungai Kupang Plasma) 9. PT Sawitakarya Manunggul (Sawita Plasma) 10. PT Kresna Duta Agroindo (Jakluay Plasma, Bukit Subur Plasma) 11. PT Kresna Duta Agroindo (Rantau Panjang Plasma) 12. PT Kencana Graha Permai (Kayung Plasma, Kencana Plasma, Kenanga Plasma) 13. PT Paramitra Internusa Pratama (Belian Plasma) 14. PT Paramitra Internusa Pratama (Muara Tawang KKPA) 15. PT Paramitra Internusa Pratama (Kapuas Hulu KKPA) 16. PT Mitrakarya Agroindo (Sulin Plasma) 17. PT Agrokarya Prima Lestari (Sapiri Plasma) 18. PT Adi Tunggal Mahajaya (Sako Plasma) 19. PT Kresna Duta Agroindo – Pelakar Mill (Tiga Serumpun Plasma) 20. PT Kresna Duta Agroindo – Langling Mill (Batang Gading Plasma) <p>There are 4 companies which still on process to revise EIA document and temporary storage place for hazardous and toxic waste, consist of:</p> <ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa (Kasuari Mill, Cendrawasih Estate, Nuri Estate, Rajawali Estate) 2. PT Sumber Indah Perkasa (Mambruk Estate) 3. PT Sawit Mas Sejahtera (Sungai Kikim Mill, Sungai Kikim Estate, Sungai Pangi Estate, Sungai Musi Estate, Sungai Saling Estate) 4. PT Bumi Sawit Permai (Sungai Enim Estate, Sungai Lematang Estate) <p>In the 2021 period, several companies were acquired by GAR according to the notarial deed of amendment dated August 4, 2021, including:</p> <ol style="list-style-type: none"> 1. PT Kruing Lestari Jaya 2. PT Harapan Rimba Raya 3. PT Rimbaraya Tamajaya 4. PT Agrolestari Subur Sejahtera 5. PT Agrolestari Hijau Sentosa 6. PT Kharisma Riau Sentosa Prima 7. PT Mitranusa Permata

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>The company is still collecting information and documentation related to compliance with legal documents such as HGU, Environmental Documents and SHM (for plasma).</p> <p>Auditor Verification: Legal process is still going on and there is a detail update progress documented by the company for each year.</p> <ul style="list-style-type: none"> - PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base), there is a legal non-compliance. Supply base for Kasuari Mill are PT Sinar Kencana Inti Perkasa and PT Sumber Indah Perkasa. The legal non compliance which still on process is EIA revision in PT Sumber Indah Perkasa and Hazardous waste permit in PT Sinar Kencana Inti Perkasa. - PT Binasawit Abadi Pratama (Perdana Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Agrokarya Prima Lestari (Kuayan Mill and supply base, doesn't have land use title (HGU), the HGU is still on process. Supply base for Kuayan Mill are PT Agrokarya Prima Lestari and PT Buana Adhitama. - PT Mitrakarya Agroindo (Tangar Mill and supply base, doesn't have land use title (HGU), the HGU is still on process. - PT Sawit Mas Sejahtera (Sungai Kikim Mill and supply base), there is a legal non-compliance. Supply base for Sungai Kikim Mill are PT Sawit Mas Sejahtera and PT Bumi Sawit Permai. The legal non compliance which still on process is EIA revision. - PT Agrolestari Sentosa (Jalemo Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Adi Tunggal Mahajaya (Sako Mill and supply base), there is a legal non-compliance. Supply base for Sako Mill are PT Adi Tunggal Mahajaya, PT Mitra Karya Agroindo and PT Agrokarya Prima Lestari. The legal non compliance which still on process is Land Use Title (HGU). - PT SMART Tbk (Bukit Kapur Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base, doesn't have land use title (SHM), the SHM is still on process. Supply base for Gunung Kombeng Mill is communities plantation. - PT Bangun Nusa Mandiri (Kenari Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Djuanda Sawit Lestari: there is an area is still in process for HGU in Muara Wahau Estate (574.58 Ha) - PT Satya Kisma Usaha – Kalimantan Tengah: there is an area is still in process for HGU in Medang Sari Estate (24,41 Ha)

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> - PT Sawit Mas Sejahtera: there is an area is still in process for HGU in Sawit Mas Sejahtera Estate (2,291 Ha) - PT Bumi Sawit Mas: there is an area is still in process for HGU in Bumi Sawit Mas Estate (773 Ha) - PT Sumber Indah Perkasa: there is an area is still in process for HGU in Sungai Buaya Estate (155.46 Ha) and Sungai Merah Estate (241.54 Ha) - PT Ivomas Tunggal: there is an area still in process for HGU Samsam Estate (29.09 Ha), Kandista Estate (158.46 Ha), Nenggala Estate (419.9 Ha), Sei Rokan Estate (102.7 Ha), Ujung Tanjung Estate (557.3 Ha) - PT Buana Wiralestari Mas: there is area is still in process for HGU Naga Mas Estate (253.39 Ha), Naga Sakti Estate (59.79 Ha), Kijang Mas Estate (56.07 Ha) - PT Ramajaya Pramukti: there is an area still in process for HGU Rama Rama Estate (318.76 Ha) - PT Bumipalma LestariPersada: there is an area still in process for HGU Bumi Palma Estate (39.21 Ha) - PT Kruing Lestari Jaya (Sungai Perak Mill and supply base), doesn't have land use title (HGU), the HGU is still on process <p>In 2022, GAR has made additional units by acquiring 4 factories namely Sungai Perak Mill, Sungai Kedang Mill, Bukit Perak Mill, Bumi Palma Mill and 15 plantations (11 own plantations namely Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Pahu Estate, Bukit Permai Estate, Bukit Lestari Estate, Kharisma Estate and 4 plasma plantations/KKPA namely Sungai Pikan Plasma, Sungai Tohan Plasma, Sungai Pahu Plasma, Kharisma Plasma).</p> <p>Internal audit activities have been carried out, as follows:</p> <ol style="list-style-type: none"> 1. PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA with an internal audit on 17 May 2022. 2. PT Harapan Rimba Raya : Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA with an internal audit on 17 May 2022. 3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA with an internal audit on 17 May 2022. 4. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be the supply base of Bukit Perak Mill (PT Bumi Permai Lestari) that has been certified with an internal audit on 28 March 2022. 5. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be the supply base of Bukit Perak Mill (PT Bumi Permai Lestari) that has been certified with an internal audit on 28 March 2022. 6. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be the supply base of Bumipalma

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Mill (PT Bumipalma Lestari Persada) that has been certified with an internal audit on 8 August 2022.</p> <p>7. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be the supply base of Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa) with an internal audit on 7 November 2022.</p> <p>Then there will be additional units in 2022 with the acquisition by GAR of 2 mills and 16 Estates (11 own estates and 5 estate plasma/KKPA). Internal audit activities have not yet been carried out, but prior to the acquisition of these units, GAR has carried out a due diligence or internal assessment so that it can be decided to be acquired by GAR, with details as follows:</p> <ol style="list-style-type: none"> 1. PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA. 2. PT Harapan Rimba Raya : Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA. 3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA which will be supply base for Sungai Kedang Mill (PT Harapan Rimba Raya). 4. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified. 5. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified. 6. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be supply base for Bumipalma Mill (PT Bumipalma Lestari Persada) which has been certified. 7. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be supply base for Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa). <p>The acquisition company already has legality in the form of HGU, but other legalities such as environmental documents and other permits are being collected and will be completed when an internal audit of the acquisition units is carried out.</p> <p>There are 4 companies which still on process to revise EIA document and temporary storage place for hazardous and toxic waste, consist of:</p> <ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa (Kasuari Mill, Cendrawasih Estate, Nuri Estate, Rajawali Estate) 2. PT Sumber Indah Perkasa (Mambuk Estate) 3. PT Sawit Mas Sejahtera (Sungai Kikim Mill, Sungai Kikim Estate, Sungai Pangi Estate, Sungai Musi Estate, Sungai Saling Estate) 4. PT Bumi Sawit Permai (Sungai Enim Estate, Sungai Lematang Estate)

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>PT. Agrolestari Sentosa (Jalemo Mill and supply bases), still on process to revise EIA document.</p> <p>There are some unit still on process the land certificate (SHM) consist of:</p> <ol style="list-style-type: none"> 1. PT Kresna Duta Agroindo – Gunung Kombeng Mill (Gunung Kombeng Plasma) 2. PT Ramajaya Pramukti (Ramarama Plasma) 3. PT Satya Kisma Usaha – Sungai Bengkal Mill (Kilis Plasma) 4. PT Agrokarya Prima Lestari (Sungai Sambon Plasma) 5. PT Djundasawit Lestari (Pandawa Plasma) 6. PT Foresta Lestari Dwikarya (Tanjung Rusa Plasma) 7. PT Palmindo Biliton Berjaya (Tanjung Sawit Plasma) 8. PT Sinar Kencana Inti Perkasa (Sungai Kupang Plasma) 9. PT Sawitakarya Manunggul (Sawita Plasma) 10. PT Kresna Duta Agroindo (Jakluay Plasma, Bukit Subur Plasma) 11. PT Kresna Duta Agroindo (Rantau Panjang Plasma) 12. PT Kencana Graha Permai (Kayung Plasma, Kencana Plasma, Kenanga Plasma) 13. PT Paramitra Internusa Pratama (Belian Plasma) 14. PT Paramitra Internusa Pratama (Muara Tawang KKPA) 15. PT Paramitra Internusa Pratama (Kapuas Hulu KKPA) 16. PT Mitrakarya Agroindo (Sulin Plasma) 17. PT Agrokarya Prima Lestari (Sapiri Plasma) 18. PT Adi Tunggal Mahajaya (Sako Plasma) 19. PT Kresna Duta Agroindo – Pelakar Mill (Tiga Serumpun Plasma) 20. PT Kresna Duta Agroindo – Langling Mill (Batang Gading Plasma) <p>Based on auditor verification, there is still progress in obtaining legality documents for the uncertified units so that GAR has included the certification plan for the uncertified units in the timebound plan.</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 Recertification Assessment

NCR No.	: 2020.01	Issued by	: Hasiholan Sihombing																										
Date Issued	: 21 December 2020	Time Limit	: 21 March 2021																										
NC Grade	: Critical	Date of Closing	: 9 March 2021																										
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): Based on field observations and document review, the following evidences are known: <ul style="list-style-type: none"> The company has a document SOP for Personal Protective Equipment Management No. SOP / SMART / HESS-EHSD / SADV / I / 010, dated July 1, 2014. SOPs include the following: <ul style="list-style-type: none"> Point 2.2.11 The assistant and the P2K3 secretary conducts an indiscipline inspection of the use of PPE (F / SMART / HESS-EHSD / SADV / 010/005) at least once a month for an unspecified time using the patrol method. Point 2.2.14 The P2K3 secretary evaluates the effectiveness of using the PPE provided in providing protection and a sense of comfort to workers. Standard Form for PPE Needs No. F / SMART / HESS-EHSD / SADV / 010/001, as for the PPE standard for the Estate Section for Harvesting Activities (Fruit Cutting / FFB), including: <table border="1"> <thead> <tr> <th>PPE</th><th>Specification</th><th>Description</th><th>Replacement</th></tr> </thead> <tbody> <tr> <td>Helmet</td><td>PVC V Guard advance</td><td>-</td><td>Every time there is damage</td></tr> <tr> <td>Safety Eyeglasses/ Face Shield</td><td>Clear plastic lens</td><td>-</td><td>Every time there is damage</td></tr> <tr> <td>Rubber Grip</td><td>Material: Antistatic rubber</td><td>If the harvest is carried out in an area of high voltage power grids</td><td>Every time there is damage</td></tr> <tr> <td>Boot shoes</td><td>Boot PVC 10"</td><td>-</td><td>Every time there is damage</td></tr> </tbody> </table> <ul style="list-style-type: none"> PPE recommendations listed in the ISBPR Form for the LBLE work unit for the period January - December 2020, are as follows: <table border="1"> <thead> <tr> <th>Activity</th><th>PPE</th></tr> </thead> <tbody> <tr> <td>Cutting FFB</td><td>Shoes, Helmet, Eyeglasses</td></tr> <tr> <td>Collecting loose fruit</td><td>Shoes, Helmet, Eyeglasses</td></tr> </tbody> </table>				PPE	Specification	Description	Replacement	Helmet	PVC V Guard advance	-	Every time there is damage	Safety Eyeglasses/ Face Shield	Clear plastic lens	-	Every time there is damage	Rubber Grip	Material: Antistatic rubber	If the harvest is carried out in an area of high voltage power grids	Every time there is damage	Boot shoes	Boot PVC 10"	-	Every time there is damage	Activity	PPE	Cutting FFB	Shoes, Helmet, Eyeglasses	Collecting loose fruit	Shoes, Helmet, Eyeglasses
PPE	Specification	Description	Replacement																										
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Activity	PPE																												
Cutting FFB	Shoes, Helmet, Eyeglasses																												
Collecting loose fruit	Shoes, Helmet, Eyeglasses																												

- The company shows recorded evidence that socialization has been carried out regarding ISBPR and the use of PPE.
- The company shows the minutes of submitting PPE in 2020 for harvest employees and loose fruit collectors at LBLE.
- Based on interviews with LBLE management, it was found that the socialization and inspection of PPE was carried out every morning rally.
- However, based on the results of field observations in block I22 Division 6 LBLE, it was found that 4 harvesters and 1 loose fruit picker were found working using short rubber boots that were provided by themselves, and one harvester was found to be not wearing a helmet while working.

Non-Conformance Description (filled by auditor):

Based on the evidence above, the company has not been able to effectively ensure that all workers use appropriate personal protective equipment (PPE).

Root Cause Analysis (filled by organization audited):

The company has a personal protective equipment management SOP No SOP / SMART / HESS-EHSD / SADV / I / 010. The method of supervision is carried out through inspection. Discipline in wearing PPE. PPE management training has not been carried out to the Foreman and Division Assistants, so that the inspection monitoring has not been effective, it is still found that employees who use PPE do not comply with the standards, or do not use PPE. This is based on the inadequate understanding of the assistant regarding OHS inspection (PPE).

Correction (filled by organization audited):

The Company through the OHS Head Office and Regional SPO Teams, SPO Officers conduct PPE management training to the Foremen and Division Assistants regarding PPE management and use of PPE as well as indiscipline inspections of employees, supervisors and assistants.

Supporting documents:

- Records of PPE Management Training for Assistants, foremen and employees
- Adding information in HIRAC to include the fulfillment of documents or what is called administrative control regarding supervision.

Corrective Action (filled by organization audited):

- P2K3 Secretary / SPO Officer Schedule and indiscipline inspection of the use of PPE and monitoring the condition of PPE every month by the related assistant.
- Assistants report the results of routine inspections and monitoring of PPE conditions every month during P2K3 meetings
- Carrying out administrative control in supervising the use of PPE is carried out by the P2K3 secretary

Supporting documents:

- RC & PC Kaltim Region memo 2
- Proof of socialization of RC & PC memos via email to All Estate Managers and Mill
- Minutes of special inspections from the Chairperson of P2K3

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification dated March 9, 2021

The company has explained the root cause analysis of non-conformities that have emerged as well as corrective action

(prevention) of the root cause analysis. Then the company also shows evidence of improvement as follows:

1. Circular from PC Kaltim No. 001 / SE-PCKT / II / 2021 dated 17 February 2021, RC Kaltim-1 No. 001 / SE-RC KT1 / II / 2021 dated 17 February 2021, RC Kaltim-2 No. 001 / SE-RC KT1 / II / 2021 dated February 13, 2021 concerning Confirmation of the Application of PPE Inspection along with records of distribution or socialization to all work units.
2. Records of socialization related to PPE management to all work units conducted on the following date: JLYM on February 26, 2021; JLYE dated February 25, 2021; BSRE on February 2, 5 and 6, 2021; LBLE dated February 25, 2021; PMSE on 22, 25 and 26 February 2021. In brief, the material socialized explains things related to:
 - Identification of PPE Needs and Procurement -> PPE is identified according to the risks and hazards of each job
 - PPE distribution -> PPE distributed to each worker and socialized its use
 - Monitoring the condition of PPE -> The completeness of PPE is monitored every day before starting work and periodic monitoring is carried out every 1 month
 - PPE monitoring results -> PPE that is damaged will be replaced
 - PPE disciplinary inspections -> Disciplinary inspections are carried out at least once a month at random times using the patrol method
 - Imposing sanctions -> Workers who do not wear PPE are given sanctions in the form of:
 - First Violations: Warning
 - Second Violations: Warning Letter 1
 - Third Violations: Warning Letter 2
 - Fourth Violations: Warning Letter 3
 - Fift Violations: Termination of Employment (PHK)
3. The 2021 ISBPR form for all units (JLYE, JLYM, BSRE, LBLE and PMSE) that have included PPE Inspection activities in administrative control.
4. PPE Inspection work program in 2021 for all units (JLYE, JLYM, BSRE, LBLE and PMSE), inspections are carried out by the Assistant and Chair of P2K3.
5. Records of Indiscipline Inspection on the Use of PPE in February 2021 for all units (JLYE, JLYM, BSRE, LBLE and PMSE), based on the results of the inspection it is known that all employees have used the appropriate PPE.

Based on the root cause analysis, corrective actions and evidence that improvements have been sent, the discrepancies in this Critical / Major indicator can be declared as **closed**.

Verified by	:	Hasiholan Sihombing
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NCR No.	: 2020.02	Issued by	: Bayu Yogatama
Date Issued	: 21 December 2020	Time Limit	: ASA-1.1
NC Grade	: Critical	Date of Closing	:
Standard Ref. & Requirement	: 7.12.8 Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.		
Evidence observed (filled by auditor): <p>Based on the document review, the following evidences are known:</p> <ul style="list-style-type: none"> Referring to the statement area and planting year data within the scope of PT Tapan Nadenggan's certification, there was land clearing that was carried out after November 2005 by the management unit. The new HCV assessment was carried out by the management unit in 2013 which resulted in land clearing that was carried out without going through an HCV assessment in the period 2006 - 2013. The management unit, represented by GAR, has made disclosure to the RSPO on 29 August 2014 regarding the areas cleared / planted without going through an HCV assessment. The company made a submission on 14 December 2015 to the RSPO. Then on June 13 2018, GAR resubmitted the LUCA report for PT Tapan Nadenggan-Jakluay Mill to the RSPO. Over time, the LUCA report was reviewed by the RSPO and responded to by the management unit. The last LUCA review progress was the sending of clarification from GAR to the RSPO which was carried out on June 9, 2020 to answer the response / review from the RSPO which was sent on December 23, 2019. Until the recertification audit activity was carried out, the LUCA report had not been received or declared as passed by the RSPO. 			
Non-Conformance Description (filled by auditor): <p>The management unit has not been able to show evidence that the LUCA report has been declared passed by the RSPO and evidence that the Remediation and Compensation procedures have been implemented.</p>			
Root Cause Analysis (filled by organization audited): <p>The management unit is always committed to completing the RaCP process by following the RaCP stages and procedures. The last status of the company has clarified the RSPO feedback, and currently the RSPO is still reviewing the LUCA Report submitted by the company. The company cannot intervene in the review process carried out by the RSPO and the Consultants.</p>			
Correction (filled by organization audited): <p>The company (Hendi Hidayat) sent a communication email to RSPO Indonesia (Tiur Rumondang) on March 1, 2021 and delivered several points, namely:</p> <ul style="list-style-type: none"> Deliver the latest status of the certification unit which is hampered by the RaCP process and the potential for reduced Certified Area Requesting RSPO to reconsider so that the certification unit which is hampered by the RaCP process can continue the certification process as in the previous policy (without reducing the Certified Area). <p>Informed that the company has collaborated with Lestari Capital in implementing the RaCP project (including PT Tapan Nadenggan), but the implementation will depend on RSPO approval of LUCA, Final Conservation Liability and Concept Note.</p>			
Corrective Action (filled by organization audited):			

The company through the Sustainability Implementation Division (SIDV) will communicate with the RSPO before the certification audit is carried out and it is hoped that an official statement from the RSPO will be available regarding the RaCP status of PT Tapan Nadenggan which can be a reference for CB.

We hope that this can also be done by CB as conveyed by RSPO in an email communication dated July 23, 2020 (from: khing.suli@rspo.org) stating "With regards to the audits, please inform your Certification Bod (ies) to contact the RSPO Secretariat for the ASA and the recertification of these management units once the audits are about to take place".

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification dated March 9, 2021

The management unit has carried out a root cause analysis, made corrective actions and provided evidence of improvement in the form of an email sent from GAR to the RSPO on March 1, 2021 informing about the condition of the LUCA Report for all GAR units to date, of which only 6 reports have been approved. 26 reports processed. In connection with the latest regulations in the 2018 RSPO P&C which are increasingly stringent and one of the policies is that the units subject to liability cannot continue Certification activities until the compensation plan has been approved or another option is to reduce the certified area / exclude the NCLC area in the certification process. Referring to existing conditions this has the potential to reduce GAR certified areas by up to 11%. In this regard, GAR expressed its hope for the RSPO to reconsider this decision and allow all certified units with the unfinished RaCP process to continue certification as in the previous policy.

In addition, GAR informed the RSPO that GAR and Lestari Capital had an agreement to provide compensation for 1838 Ha in the Rimba Raya Landscape (ha to ha option). However, the implementation of this project is highly dependent on the completion of the RaCP process with the RSPO.

As of now, the response from the RSPO has not been able to show the email sent by GAR on March 1, 2021. Based on this, the discrepancies in this indicator have not been fulfilled.

Auditor Verification dated March 26, 2021

The management unit showed evidence of improvement in the form of an email response from RSPO to GAR which was sent on 3 March 2021. In the email it was explained that basically the RSPO was breaking the obstacle that GAR was aware of where the delay was caused by the secretariat and provided a written note that allowed the area to be in the LUCA review stage or RaCP to continue certification. The email details are as follows:

Thank you for your email and information explaining your situation.

We understand that the unexpected risk for the member companies lies in the delay from the Secretariat's side and we apologize for the issues caused.

As you may also aware that we are in the midst of restructuring the RSPO Secretariat with a new operational strategy whilst expediting the process in RaCP and LUCA with additional manpower. During this period, to allow our member to continues operating their commitment to the relevance RSPO requirement, including the Time-Bound Plan and the audit plan, the Assurance division may issue advisory notes to the respective CBs to allow the said area under LUCA and RaCP to be included in the audit proceeding. If there is another audit plan you prepare to commence within 2021 other than what you have listed below, kindly inform us to allow the same action. I will priorities the LUCA and RaCP under GAR in the coming months and hopefully, we can close, at least the cases you have listed, before the end of 2021.

We will communicate further to the respective CB and furnish you with a copy of the advisory notes. If there is anything else I have not addressed in this reply, do not hesitate to contact me or we can follow up with a meeting.

- Responding to the email indicated by the RSPO, PT Mutuagung Lestari as CB communicated with RSPO on March 15, 2021 to ensure the continuation of the communication made by RSPO and GAR regarding the advisory note. The emails sent include:

Dear Ibu Suli,

Hi Ibu Suli, we hope you're a good health.

For your information, audit onsite RC RSPO PT Tapan Nadenggan has been conducted on 18 to 21 December 2020, with scope audit is Jakluay POM, supplied by 4 (four) own estates: Jakluay Estate, Pantun Mas Estate, Long Buluh Estate and Bukit Subur Estate (Scope Area: 15,671.75 Ha).

The findings of RC audit for indicator critical 7.12.8 are "The management unit has not been able to show evidence that the LUCA report has been declared passed by the RSPO and evidence that the Remediation and Compensation procedures have been implemented". The deadline for the findings is 21 March 2021. Related about that, please informed about the current RaCP status updates and progress of PT Tapan Nadenggan (Jakluay POM).

Besides that, please find on attachment email from management of GAR regarding communication between GAR management and the RSPO Director of Assurance. Management of GAR stated that the RSPO will issue advisory notes to CB to allow areas under LUCA and RaCP processes to be included in RSPO certification. Please we need explanation and confirmation about this.

I look forward to hearing from you soon and thank you for your attention.

- On March 23, 2021, CB made contact back to RSPO because the email dated March 15, 2021 had not yet received a response, with the following details:

Dear Ibu Tiur

We just want to update the progress of RaCP in Jakluay POM – PT Tapan Nadenggan subsidiary of GAR, since in the last communication between GAR and RSPO inform that RSPO will issued advisory notes to CB. Please your advices regarding to this case.

- On the same day (23 March 2021) the RSPO sent an email containing a reply:

Dear Pak Ardian,

On behalf of Bu Tiur, i would like to have a quick response on this matter.

I noticed that there is an unusual situation where now you have been in the last day of NC open during your last audit in December 2020, and you are not sure going forward.

Please allow us the RSPO Secretariat within the next 2 (two) working days to issue any relevant Advisory Note related to the on-going RaCP processes of this particular Certification Unit as you've mentioned. Meanwhile, please put on hold for any further actions from your end.

- On March 26, 2021 RSPO sent an email to CB along with the RSPO Compliance Advisory letter No: 0002/03/21 Assurance - Integrity dated 25 March 2021. The document shown explains that the company units under GAR are going through the LUCA review process or the concept of Note RaCP, whether units that have been certified or not yet certified, the validity period of the advisory Note and others. Compliance Advisory was recommended by Wan Muqtadir Wan Abdul Fatah as Senior Manager of Integrity on March 24, 2021 and approved by Tiur Rumondang as Assurance Director on March 25, 2021. Briefly the contents of. Compliance Advisory as follows:

The approval to continue with certification can only be done for the unit of certification that will be expiring in the next six months from the issuance of this Advisory Note. The NC that is raised will be allowed to be open until the next surveillance/recertification audits.

- For the other units that have expiring license from October 2021 onwards would need to continue its follow-up with RSPO on the RaCP status and completion continuously. Those units will be evaluated again on its progress.
- For any unit that is at the initial certification stage, issuance of a certificate can only be done after the compensation plan has been approved.

Based on the evidence above, this non-conformity is allowed to open up to ASA-1.1 and will be re-verified during the ASA-1.1 audit.

Verification on ASA 1.1

The company can show some evidence of LUCA's progress, namely:

- LUCA Review Report (5th) PT Tapian Nadenggan (PMSE, JLYE, LBLE) with PASS status where the document explains that there is FCL: 1,046.65 Ha and Environmental remediation: 183.48 (Riparian buffer zone).
- Email from RSPO (khing.suli@rspo.org) on 12 May 2021 stating that LUCA review report PT TN Kaltim 2 with the PASS status with summary of key findings FCL: 1,046.65 Ha and Environmental remediation: 183.48 (Riparian buffer zone).
- The company has sent Concept Notes to several companies under GAR, one of which is PT Tapian Nadenggan Kaltim 2 to the RSPO on 10 June 2021.
- An email from the RSPO (alicia@rspo.org) on 26 July 2021 stated that the RSPO Secretariat had conducted an initial review of the Concept Note and would request to respond to the review of the concept note.
- There was an email from the RSPO (alicia@rspo.org) on 8 September 2021 stating that the revised concept note had been reviewed and that some more clarification was needed.
- There was an email from the company (Wirendro Sumargo) on September 10, 2021, a response from the company regarding the response from the Concept Note Review.
- There was an email from the RSPO (rspocompensation@rspo.org) on 4 October 2021 stating that the revised concept note had been moved to the next stage with panel compensation and awaiting response from panel compensation.
- There was an email from the company (Wirendro Sumargo) on 11 November 2021 to the RSPO asking for the third concept note that had been sent to the RSPO but no response.
- There was an email from the RSPO (rspocompensation@rspo.org) on 11 November 2021 stating that the Concept Note had been sent to the compensation panel but was still pending due to several reasons.
- For PT Tapian Nadenggan (Bukit Subur Estate) the company has sent LUCA to RSPO and currently LUCA has not received PASS status from RSPO and is still LUCA Clarification status.
- There was an email from rspo (aryo.gustomo@rspo.org) on 18 February 2022 regarding the 2nd Advisory Note to CB on GAR's Certification and RaCP process stating that Conditional Approval would only be given for those Management Units that have been certified before to allow the Company to complete the RaCP process and continue the Annual Surveillance Assessment (ASA) and/or Recertification. And this will only be valid until the next 6 months from the date of this email. From time to time, we will review all the progress and status of the Certification and RaCP process for the particular certified management units, and we may revoke this conditional approval if any issues happen that may heavily threaten the integrity of RSPO standard requirements. The email also explained the stages of PT Tapian Nadenggan's RaCP Process, namely:
 1. Jakluay Mill (JLYM) PT Tapian Nadenggan (TN): Jakluay Estate, Pantun Mas Estate, and Long Buluh Estate Status In Review Concept Note.
 2. Jakluay Mill (JLYM) PT Tapian Nadenggan (TN): Bukit Subur Estate status LUCA Clarification.
- In the 2nd Advisory Note to CB on GAR's Certification and RaCP process it was stated that Jakluay Mill (JLYM) PT Tapian Nadenggan (TN) Jakluay Estate, Pantun Mas Estate, and Long Buluh Estate and Jakluay Mill (JLYM) PT Tapian Nadenggan (TN): Bukit Subur Estate may proceed with follow-up audits, NC will remain open until the next ASA and management unit must provide updates on pending actions/clarifications to the RSPO Secretariat within the next 3 months.

Based on the evidence above, this discrepancy is allowed to be open up to ASA-2 and will be verified again during

the ASA-2 audit.

Verified by : Bayu Yogatama/Rahmat Abdiansyah

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-1.1 Assessment.

NCR No.	: 2022.01	Issued by	: Hasiholan Sihombing
Date Issued	: April 16 th , 2022	Time Limit	: ASA-1.2
NC Grade	: Minor	Date of Closing	: 31 March 2023
Standard Ref. & Requirement	6.2.7 Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.		
Evidence observed (filled by auditor): PKWT (Specific Time Work Agreement): <ul style="list-style-type: none"> The results of the review of the labor list document as of March 2022 revealed that PT Tapan Nadenggan still has workers with <i>PKWT</i> status with a total of 436 people. Of the total number of existing <i>PKWT</i>, there are 97 <i>PKWT</i> workers who work as harvesters (permanent work) at JLYE unit, 92 people at PMSE unit, 120 people at LBLE unit and 127 people at BSRE unit. Based on the results of interviews with <i>PKWT</i> workers in all units (JLYE, PMSE, LBLE, and BSRE) it is known that these workers renew their <i>PKWT</i> SPK once a year. For example, workers with the initials FRD in the LBLE unit who are still <i>PKWT</i> status for the last 4 years (since 2018). Harvest work is a permanent job, this is because the criteria for harvesting work are included in the description of permanent work in <i>UU Cipta Kerja</i> no. 13 of 2003 (explanation of article 59 paragraph 2) where it reads "work that is continuous, uninterrupted, not limited by time and is part of a production process in one company or work that is not seasonal." In Government Regulation No. 35 of 2021 on the <i>PKWT</i> section explains that <i>PKWT</i> cannot be held for work that is permanent and <i>PKWT</i> can be held based on a period of time (work that is not completed for too long, seasonal work, work related to new products) or the completion of a particular job (work that once completed and temporary work). 			
Non-Conformance Description (filled by auditor): The company has not been able to show sufficient evidence that the provisions relating to workers with <i>PKWT</i> status are in accordance with applicable regulations (<i>PP</i> No. 35 of 2021 and <i>UU Cipta Kerja</i> No. 13 of 2003) especially related to the types of work that can be hired for <i>PKWT</i> .			
Root Cause Analysis (filled by organization audited): The company continuously strives to comply with applicable regulations in hiring employees, including harvesters. In determining the appointment of employees to become permanent employees, the company determines the following criteria: <ol style="list-style-type: none"> 1. Performance 2. Discipline At the time of hiring the employee there were employees who did not meet the criteria mentioned above, but considering the social conditions and the employee's need to work in order to meet their daily needs, the company still employed these employees with <i>PKWT</i> status.			
Correction (filled by organization audited):			

The company has Circular Letter from VPA No.002/VPA Kalseltim/12/2017 regarding Recruitment of PKWT Workers (Harvesters) and has a Harvest PKWT appointment program with the following details:

a. Jakluay Estate (JLYE)

Letter of Application for Appointment of permanent Employees to RC Kaltim 2 dated 22 June 2022 with number 104/JLYE/06/2022 with a total proposed appointment of 65 employees.

Letter of Approval for the Appointment of JLYE Permanent Workers (PT) from VPA PSM 3 to RC Kaltim 2 dated June 27 2022 with number 004/VPA3-INT/BNJO/06/2022 which contains approval for the appointment of 19 harvest workers.

b. Long Buluh Estate (LBLE)

Letter of Application for PT Employee Appointment to RC Kaltim 2 dated 23 June 2022 with number 01/INT-UH/06/2022 with a total proposed appointment of 45 employees.

Letter of Approval for the Appointment of Permanent Workers LBLE from VPA PSM 3 to RC Kaltim 2 dated 27 June 2022 with number 005/VPA3-INT/BNJO/06/2022 which contains approval for the appointment of 12 PT employees for harvesting.

c. Pantun Mas Estate (PMSE)

Letter of Application for PT Employee Appointment to RC Kaltim-1 dated 12 June 2022 with number 01/INT-UH/06/2022 with a total proposed appointment of 28 employees.

Letter of Approval for the Appointment of PMSE Plantation Permanent Workers from VPA PSM 3 to RC Kaltim 1 dated June 27 2022 with number 007/VPA3-INT/BNJO/06/2022 which contains approval for the appointment of 11 PT employees for harvesting.

Attachment:

- Appointment Letter no 003/SK-PT/JLYE/VII/2022 concerning appointment as PT employee on behalf of Ahmad Fauzan
- Appointment Letter no 002/MGR-LBLE/07/2022 regarding appointment as PT employee on behalf of Rikardus Ompi
- Appointment Letter no 0011/SK-PT/PMSE/VII/2022 concerning changes to the rank of permanent workers on behalf of Arga

Bukit Subur Estate

Shows the program and progress of harvest PKWT appointment. Sample PKWT Harvest that has been appointed has been attached

Corrective Action (filled by organization audited):

a) The company's commitment to appointing PKWT Harvest is contained in Circular Letter of VPA dated 13 June 2022 with no 001/VPA PSM-3/VI/2022 concerning the employment status of harvest employees

b) SPO Region provides socialization to each Unit Head regarding Circular Letter of VPA no 001/VPA PSM-3/VI/2022 via email on 5 July 2022.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification July 14, 2022:

The company has explained the root cause analysis, correction and corrective action of the non-conformities that have arisen as well as evidence of corrective actions in the form of:

- VPA Circular Letter No. 002/VPA Kalseltim/12/2017 concerning Recruitment of PKWT Workers (Harvesters).
- VPA Circular Letter No. 001/VPA PSM-3/VI/2022 concerning Employment Status of Harvest Employees which explains that harvest employees are permanent PT3 workers.
- Long Term PKWT Appointment Program
- Evidence of socialization of SPO Kaltim 2 via e-mail dated 5 July 2022 to each Unit Head regarding Circular Letter of VPA no 001/VPA PSM-3/VI/2022.

- Letter of Application for Employee Appointment number 104/JLYE/06/2022 for 65 harvest workers at the JLYE unit on June 22, 2022.
- Letter of Approval for the Appointment with number 004/VPA3-INT/BNJO/06/2022 for 19 harvest workers at the JLYE unit on June 27, 2022.
- Letter of Application for Employee Appointment number 01/INT-UH/06/2022 for 45 harvest workers in the LBLE unit on June 23, 2022.
- Letter of Approval for the Appointment with number 005/VPA3-INT/BNJO/06/2022 for 12 harvest workers in the LBLE unit on June 27, 2022.
- Letter of Application for Employee Appointment with number 01/INT-UH/06/2022 for 28 harvest workers in the PMSE unit on June 12, 2022.
- Letter of Approval for the Appointment with number 007/VPA3-INT/BNJO/06/2022 for 11 harvest workers in the PMSE unit on June 27, 2022.
- An example of appointing a harvest PKWT worker to become a Permanent Worker (PT), such as:
 - Appointment Letter No. 003/SK-PT/JLYE/VII/2022 regarding appointment as PT employee on behalf of Ahmad Fauzan
 - Appointment Letter No. 001/MGR-LBLE/07/2022 and No. 002/MGR-LBLE/07/2022 regarding the appointment as PT employees on behalf of Paskalis Djawa Goa Lobo and Rikardus Ompi.
 - Appointment Letter No. 0011/SK-PT/PMSE/II/2022 concerning changes to the rank of permanent workers on behalf of Arga

However, the company has yet to inform and show evidence of other improvements listed in the Correction column. This discrepancy still cannot be declared fulfilled.

Auditor Verification July 15, 2022

The following is a verification for each PMSE, LBLE and JLYE plantation unit, as follows:

PMSE Unit:

- The company shows the progress action plan document PKWT Harvest dated 15 July 2022 and approved by SPO Region Kaltim-2. It is known that the total PKWT harvest workforce is 92 people. The document also explains the program for appointing PKWT harvest which is planned to be carried out in July 2022 for 28 people, January 2023 for 50 people and July 2023 for 14 people.
- Letter of Application for Employee Appointment with number 01/INT-UH/06/2022 for 28 harvesters on June 12, 2022.
- Letter of Approval for the Appointment with number 007/VPA3-INT/BNJO/06/2022 on 27 June 2022. It was explained that the VPA approved 11 out of 28 harvesters to be appointed as PKWTT per July 2022.
- The company shows a document proposing the appointment of Permanent Workers (PT) in July 2022 which explains the conditions of 17 out of 28 PKWT harvest workers whose assessment does not meet the criteria (absence and average output for 3 months <90%). Based on interviews with management representatives, information was obtained that workers who did not meet the assessment criteria would be proposed to become PKWTT in the next period (January 2023).
- Then, the company shows examples of hiring PKWT harvest workers to become Permanent Workers (PT), for example as stated in Appointment Letter No. 0011/SK-PT/PMSE/II/2022 regarding the appointment of PKWTT/PT status on behalf of Arga.

LBLE Unit:

- Based on a review of the worker list document for the period March 2022 (the one month period before the audit was carried out), it is known that the total PKWT harvest workforce is 120 people. However, the results of interviews with management representatives and a review of the LBLE Harvester Names document for the period July 2022, obtained information that there was an additional workforce of 11 harvesters (the addition occurred in April 2022 at the time the

audit was conducted). So that the total current harvest PKWT workers are 131 people.

- The company shows the Progress Action Plan NCR PKWT Harvest ISPO JLYM and Supply Base document dated 15 July 2022 and ratified by SPO Region Kaltim-2. The document describes:
 - The need for harvest labor (man power) in the LBLE unit is 173 people and the current total harvest workforce is 171 people, of which 131 people are PKWT workers.
 - The harvest PKWT appointment program is planned to be carried out in July 2022 for 30 people, January 2023 for 73 people and July 2023 for 28 people.
- Letter of Application for PT Employee Appointment with number 01/INT-UH/06/2022 on June 23 2022 for 12 harvesters aged <35 years and 19 harvesters aged > 35 years.
- Letter of Approval for the Appointment with number 005/VPA3-INT/BNJO/06/2022 on June 27 2022 for 12 harvesters aged <35 years.
- The company shows the PKWT Harvest Appointment Document to the CEO on 12 July 2022. The document explains the progress of submitting the appointment of 16 out of 19 harvest workers aged >35 years CEO.
- Next, the company shows the Proposed Appointment of Permanent Workers (PT) documents that do not meet the criteria. It was stated that 3 of the 19 PKWT harvest workers whose assessment was proposed did not meet the criteria (attendance and average output for 3 months <90%). Based on interviews with management representatives, information was obtained that workers who did not meet the assessment criteria would be proposed to become PKWTT in the next period (January 2023).
- Then, the company shows examples of hiring PKWT harvest workers to become Permanent Workers (PT), for example as stated in Letter No. 001/MGR-LBLE/07/2022 and No. 002/MGR-LBLE/07/2022 regarding the appointment as permanent employees on behalf of Paskalis Djawa Goa Lobo and Rikardus Ompi.

JLYE Unit

- Based on a review of the PKWT JLYE Harvester Worker Document for the June 2022 period, it is known that the total PKWT harvest workforce is 97 people. However, the results of interviews with management representatives, obtained information that there were 11 harvesters who were no longer working at the company. So that the total current harvest PKWT workers are 86 people.
- The company shows the Progress Action Plan NCR PKWT Harvest ISPO JLYM and Supply Base document dated 15 July 2022 and ratified by SPO Region Kaltim-2. The document describes the program for hiring 86 PKWT harvest workers which is planned to be carried out in July 2022 as many as 9 people and in January 2023 as many as 77 people.
- Letter of Application for Employee Appointment with number 104/JLYE/06/2022 on June 22 2022 for 19 harvesters aged <35 years and 8 harvesters aged > 35 years.
- Letter of Approval for the Appointment with number 004/VPA3-INT/BNJO/06/2022 on 27 June 2022 for 19 harvesters aged <35 years.
- The company shows the PKWT Harvest Appointment document to the CEO on 12 July 2022. The document explains the progress of 8 harvesters aged >35 years who are still waiting for approval from the CEO.
- Then, the company shows examples of hiring PKWT harvest workers to become Permanent Workers (PT), for example as stated in Letter No. 003/SK-PT/JLYE/VII/2022 regarding the appointment of PKWTT/PT status in the name of Ahmad Fauzan.
- However, the company has not shown evidence of improvement in the Bukit Subur Estate (BSRE) unit so that the discrepancy in this indicator has not been fulfilled.

Verification during surveillance assessment 1.2

The company shows evidence of improvement in the form of:

Monitoring program for contract harvesting workers (temporary worker agreement) to become permanent worker. The program also informs the realization of appointments from July 12 2022 to March/April 2023 with the following details:

Unit	Appoinment of temporary workers at 12 July 2022	Appoinment of temporary workers at 4 October 2022	Appoinment of temporary workers at March/April 2023 (has been approved)	Temporary Workers Appointment in progress
JLYE	9	8	12	14
LBLE	30	16	21	18
BSRE	43	5	7	7
PMSE	28	11	14	6

As a result of interviews with management, information was obtained that there were harvest workers who had resigned/came out as of February 2023 with total 215 harvesting workers and company had shown several samples of harvester resignation letters. Due to the large number of harvest workers who resigned/came out, the company has evaluated and re-established/revised the timeline for the appointment of temporary workers that doing harvest work which was previously planned to be completed in July 2023 to March 2024. The revised appointment program on March 31, 2023 includes:

Unit	July 2023	November 2023	March 2024
JLYE	4	20	17
LBLE	12	30	64
BSRE	51	30	104
PMSE	5	35	78

The company has also shown evidence of temporary harvest worker appointments, such as:

- Appointment Letter No. 039/SK-PT/BSRE/X/2022 dated October 1, 2022 with worker initial MR
- Letter of Appointment No. 006/SK-PT/BSRE/VII/2022 dated 1 July 2022 with worker initial ES
- Appointment Letter No. 006/SK-PT/BSRE/IV/2023 dated 1 April 2023 with worker initial PPS
- Appointment Letter No. 028/SK-PT/BSRE/X/2022 dated 1 October 2022
- Etc.

Based on that explanation, the nonconformity is declared fulfilled and the realization of the appointment program that has been made will be ensured/observed again in the next assessment.

Verified by : **Sabiah Dhiningtyas Utami / Rindu Galih/Rizliani A Hsb**

3.4.3. Identification of Findings, Corrective Actions and Observations at 1.2 Assessment

NCR No.	: 2020.02	Issued by	: Bayu Yogatama
Date Issued	: 21 December 2020	Time Limit	: ASA-1.1
NC Grade	: Critical	Date of Closing	: Still Open
Standard Ref. & Requirement	7.12.8 Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.		
Evidence observed (filled by auditor):			
Based on the document review, the following evidences are known:			
<ul style="list-style-type: none">Referring to the statement area and planting year data within the scope of PT Tapan Nadenggan's certification, there was land clearing that was carried out after November 2005 by the management unit. The new HCV assessment was carried out by the management unit in 2013 which resulted in land clearing that was carried out without going through an HCV assessment in the period 2006 - 2013.The management unit, represented by GAR, has made disclosure to the RSPO on 29 August 2014 regarding the areas cleared / planted without going through an HCV assessment.The company made a submission on 14 December 2015 to the RSPO. Then on June 13 2018, GAR resubmitted the LUCA report for PT Tapan Nadenggan-Jakluay Mill to the RSPO. Over time, the LUCA report was reviewed by the RSPO and responded to by the management unit. The last LUCA review progress was the sending of clarification from GAR to the RSPO which was carried out on June 9, 2020 to answer the response / review from the RSPO which was sent on December 23, 2019.Until the recertification audit activity was carried out, the LUCA report had not been received or declared as passed by the RSPO.			
Non-Conformance Description (filled by auditor):			
The management unit has not been able to show evidence that the LUCA report has been declared passed by the RSPO and evidence that the Remediation and Compensation procedures have been implemented.			
Root Cause Analysis (filled by organization audited):			
The management unit is always committed to completing the RaCP process by following the RaCP stages and procedures. The last status of the company has clarified the RSPO feedback, and currently the RSPO is still reviewing the LUCA Report submitted by the company. The company cannot intervene in the review process carried out by the RSPO and the Consultants.			
Correction (filled by organization audited):			
The company (Hendi Hidayat) sent a communication email to RSPO Indonesia (Tiur Rumondang) on March 1, 2021 and delivered several points, namely:			
<ul style="list-style-type: none">Deliver the latest status of the certification unit which is hampered by the RaCP process and the potential for reduced Certified AreaRequesting RSPO to reconsider so that the certification unit which is hampered by the RaCP process can continue the certification process as in the previous policy (without reducing the Certified Area).			
Informed that the company has collaborated with Lestari Capital in implementing the RaCP project (including PT Tapan Nadenggan), but the implementation will depend on RSPO approval of LUCA, Final Conservation Liability and Concept Note.			
Corrective Action (filled by organization audited):			

The company through the Sustainability Implementation Division (SIDV) will communicate with the RSPO before the certification audit is carried out and it is hoped that an official statement from the RSPO will be available regarding the RaCP status of PT Tapan Nadenggan which can be a reference for CB.

We hope that this can also be done by CB as conveyed by RSPO in an email communication dated July 23, 2020 (from: khing.suli@rspo.org) stating "With regards to the audits, please inform your Certification Bod (ies) to contact the RSPO Secretariat for the ASA and the recertification of these management units once the audits are about to take place".

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification dated March 9, 2021

The management unit has carried out a root cause analysis, made corrective actions and provided evidence of improvement in the form of an email sent from GAR to the RSPO on March 1, 2021 informing about the condition of the LUCA Report for all GAR units to date, of which only 6 reports have been approved. 26 reports processed. In connection with the latest regulations in the 2018 RSPO P&C which are increasingly stringent and one of the policies is that the units subject to liability cannot continue Certification activities until the compensation plan has been approved or another option is to reduce the certified area / exclude the NCLC area in the certification process. Referring to existing conditions this has the potential to reduce GAR certified areas by up to 11%. In this regard, GAR expressed its hope for the RSPO to reconsider this decision and allow all certified units with the unfinished RaCP process to continue certification as in the previous policy.

In addition, GAR informed the RSPO that GAR and Lestari Capital had an agreement to provide compensation for 1838 Ha in the Rimba Raya Landscape (ha to ha option). However, the implementation of this project is highly dependent on the completion of the RaCP process with the RSPO.

As of now, the response from the RSPO has not been able to show the email sent by GAR on March 1, 2021. Based on this, the discrepancies in this indicator have not been fulfilled.

Auditor Verification dated March 26, 2021

The management unit showed evidence of improvement in the form of an email response from RSPO to GAR which was sent on 3 March 2021. in the email it was explained that basically the RSPO was breaking the obstacle that GAR was aware of where the delay was caused by the secretariat and provided a written note that allowed the area to be in the LUCA review stage or RaCP to continue certification. The email details are as follows:

Thank you for your email and information explaining your situation.

We understand that the unexpected risk for the member companies lies in the delay from the Secretariat's side and we apologize for the issues caused.

As you may also aware that we are in the midst of restructuring the RSPO Secretariat with a new operational strategy whilst expediting the process in RaCP and LUCA with additional manpower. During this period, to allow our member to continues operating their commitment to the relevance RSPO requirement, including the Time-Bound Plan and the audit plan, the Assurance division may issue advisory notes to the respective CBs to allow the said area under LUCA and RaCP to be included in the audit proceeding. If there is another audit plan you prepare to commence within 2021 other than what you have listed below, kindly inform us to allow the same action. I will priorities the LUCA and RaCP under GAR in the coming months and hopefully, we can close, at least the cases you have listed, before the end of 2021.

We will communicate further to the respective CB and furnish you with a copy of the advisory notes. If there is anything else I have not addressed in this reply, do not hesitate to contact me or we can follow up with a meeting.

- Responding to the email indicated by the RSPO, PT Mutuagung Lestari as CB communicated with RSPO on March 15, 2021 to ensure the continuation of the communication made by RSPO and GAR regarding the advisory note. The emails sent include:

Dear Ibu Suli,

Hi Ibu Suli, we hope you're a good health.

For your information, audit onsite RC RSPO PT Tapan Nadenggan has been conducted on 18 to 21 December 2020, with scope audit is Jakluay POM, supplied by 4 (four) own estates: Jakluay Estate, Pantun Mas Estate, Long Buluh Estate and Bukit Subur Estate (Scope Area: 15,671.75 Ha).

The findings of RC audit for indicator critical 7.12.8 are "The management unit has not been able to show evidence that the LUCA report has been declared passed by the RSPO and evidence that the Remediation and Compensation procedures have been implemented". The deadline for the findings is 21 March 2021. Related about that, please informed about the current RaCP status updates and progress of PT Tapan Nadenggan (Jakluay POM).

Besides that, please find on attachment email from management of GAR regarding communication between GAR management and the RSPO Director of Assurance. Management of GAR stated that the RSPO will issue advisory notes to CB to allow areas under LUCA and RaCP processes to be included in RSPO certification. Please we need explanation and confirmation about this.

I look forward to hearing from you soon and thank you for your attention.

- On March 23, 2021, CB made contact back to RSPO because the email dated March 15, 2021 had not yet received a response, with the following details:

Dear Ibu Tiur

We just want to update the progress of RaCP in Jakluay POM – PT Tapan Nadenggan subsidiary of GAR, since in the last communication between GAR and RSPO inform that RSPO will issued advisory notes to CB. Please your advices regarding to this case.

- On the same day (23 March 2021) the RSPO sent an email containing a reply:

Dear Pak Ardian,

On behalf of Bu Tiur, i would like to have a quick response on this matter.

I noticed that there is an unusual situation where now you have been in the last day of NC open during your last audit in December 2020, and you are not sure going forward.

Please allow us the RSPO Secretariat within the next 2 (two) working days to issue any relevant Advisory Note related to the on-going RaCP processes of this particular Certification Unit as you've mentioned. Meanwhile, please put on hold for any further actions from your end.

- On March 26, 2021 RSPO sent an email to CB along with the RSPO Compliance Advisory letter No: 0002/03/21 Assurance - Integrity dated 25 March 2021. The document shown explains that the company units under GAR are going through the LUCA review process or the concept of Note RaCP, whether units that have been certified or not yet certified, the validity period of the advisory Note and others. Compliance Advisory was recommended by Wan Muqtadir Wan Abdul Fatah as Senior Manager of Integrity on March 24, 2021 and approved by Tiur Rumondang as Assurance Director on March 25, 2021. Briefly the contents of. Compliance Advisory as follows:

*The approval to continue with certification can only be done for the unit of certification that will be expiring in the next six months from the issuance of this Advisory Note. **The NC that is raised will be allowed to be open until the next surveillance/recertification audits.***

- *For the other units that have expiring license from October 2021 onwards would need to continue its follow-up with RSPO on the RaCP status and completion continuously. Those units will be evaluated again on its progress.*
- *For any unit that is at the initial certification stage, issuance of a certificate can only be done after the compensation plan has been approved.*

Based on the evidence above, this non-conformity is allowed to open up to ASA-1.1 and will be re-verified during the ASA-1.1 audit.

Verification on ASA 1.1

The company can show some evidence of LUCA's progress, namely:

- LUCA Review Report (5th) PT Tapian Nadenggan (PMSE, JLYE, LBLE) with PASS status where the document explains that there is FCL: 1,046.65 Ha and Environmental remediation: 183.48 (Riparian buffer zone).
- Email from RSPO (khing.suli@rspo.org) on 12 May 2021 stating that LUCA review report PT TN Kaltim 2 with the PASS status with summary of key findings FCL: 1,046.65 Ha and Environmental remediation: 183.48 (Riparian buffer zone).
- The company has sent Concept Notes to several companies under GAR, one of which is PT Tapian Nadenggan Kaltim 2 to the RSPO on 10 June 2021.
- An email from the RSPO (alicia@rspo.org) on 26 July 2021 stated that the RSPO Secretariat had conducted an initial review of the Concept Note and would request to respond to the review of the concept note.
- There was an email from the RSPO (alicia@rspo.org) on 8 September 2021 stating that the revised concept note had been reviewed and that some more clarification was needed.
- There was an email from the company (Wirendro Sumargo) on September 10, 2021, a response from the company regarding the response from the Concept Note Review.
- There was an email from the RSPO (rspocompensation@rspo.org) on 4 October 2021 stating that the revised concept note had been moved to the next stage with panel compensation and awaiting response from panel compensation.
- There was an email from the company (Wirendro Sumargo) on 11 November 2021 to the RSPO asking for the third concept note that had been sent to the RSPO but no response.
- There was an email from the RSPO (rspocompensation@rspo.org) on 11 November 2021 stating that the Concept Note had been sent to the compensation panel but was still pending due to several reasons.
- For PT Tapian Nadenggan (Bukit Subur Estate) the company has sent LUCA to RSPO and currently LUCA has not received PASS status from RSPO and is still LUCA Clarification status.
- There was an email from rspo (aryo.gustomo@rspo.org) on 18 February 2022 regarding the 2nd Advisory Note to CB on GAR's Certification and RaCP process stating that Conditional Approval would only be given for those Management Units that have been certified before to allow the Company to complete the RaCP process and continue the Annual Surveillance Assessment (ASA) and/or Recertification. And this will only be valid until the next 6 months from the date of this email. From time to time, we will review all the progress and status of the Certification and RaCP process for the particular certified management units, and we may revoke this conditional approval if any issues happen that may heavily threaten the integrity of RSPO standard requirements. The email also explained the stages of PT Tapian Nadenggan's RaCP Process, namely:
 1. Jakluay Mill (JLYM) PT Tapian Nadenggan (TN): Jakluay Estate, Pantun Mas Estate, and Long Buluh Estate Status In Review Concept Note.
 2. Jakluay Mill (JLYM) PT Tapian Nadenggan (TN): Bukit Subur Estate status LUCA Clarification.
- In the 2nd Advisory Note to CB on GAR's Certification and RaCP process it was stated that Jakluay Mill (JLYM) PT Tapian Nadenggan (TN) Jakluay Estate, Pantun Mas Estate, and Long Buluh Estate and Jakluay Mill (JLYM) PT Tapian Nadenggan (TN): Bukit Subur Estate may proceed with follow-up audits, NC will remain open until the next ASA and management unit must provide updates on pending actions/clarifications to the RSPO Secretariat within the next 3 months.

Based on the evidence above, this discrepancy is allowed to be open up to ASA-2 and will be verified again during

the ASA-2 audit.

Verification on ASA 1.2 (29 Juni 2023):

The management unit shows proof of compliance with the records from RSPo regarding the RaCP process with details:

- Relevant clarification email scope of certifications must match with the total hectareage disclosed" and based on auditor clarifications as well as stated in the email there are discrepancies between scope of certifications (based on HGU) and Disclosure /LUCA which was sent to the RSPo on 29 May 2023, detailing:

Regarding those situations the unit of certifications presented justifications as follows:

No	Unit	Luas (ha)		Selisih luasan (ha) (Disclosure-Certification)	Error (%)*)
		Scope of Certification (based on HGU/HGB)	Disclosure/LUCA (based on Digital Map/shapefile)		
1	JLYE	3845.74			
2	PMSE	5072.32			
3	LBLE	3489.14			
	Total	12407.2	12389.95	-17.25	0.13
4	BSRE (Certified)	3264.55	3320.03	55.48	1.67

- Area (ha) in "Scope of Certification" is based on HGU Decree (Text-Tabular).
- Area (ha) in "Disclosure/LUCA" is based on digitization (georeferencing process) of HGU map (hardcopy) into digital map. The digitization process is conducted through several stages which might affect quality and total area (ha) difference. The main digitization stages are:

- Hardcopy map scanning; hardcopy map conditions determine scan result quality, e.g document's clarity and folds on paper could cause distortion and measurement accuracy.
- Georeferencing process: Georeferencing is a process to register scanned map, to generate projection reference/coordinate value. BPN uses TM3 projection while in general companies use UTM-Metric projection, as we do.
- Digitization process: tracing map area/borders

Digitization is intended to provide the most accurate measure as possible. However, process of converting physical map to digital map might very probable causing light differences in the measurement.

Based on our assessment/audit result, since there is no changes in the scope of certification we assume that total hectare as in HGU is to be used as certification basis.

- Email clarification regarding the extent of Disclosure RaCP from RSPo (wan.muqtadir@rspo.org) on 29 May 2023 stating that this discrepancy is allowed to be open up to ASA 1.3 for RaCP-1079 for estate units; Jakluay Estate (JLYE), Pantun Mas Estate (PMSE), and Long Buluh Estate (LBLE).
- Proof of delivery of GAR Compensation and Remediation Concept Note Batch-3 Mensiau to 8 companies under GAR, one of which is PT Tapian Nadenggan Bukit Subur Estate (BSRE) unit with an area of 927.96 ha which was sent via email on June 23, 2023. (With the provisions of PT TN (BSRE) - 3,320.03 ha (HGU) remediation covering an area of 0.07 ha, and there are no social obligations).

Based on the explanation above, this non-conformity is allowed to be open up to ASA 1.3 and will be verified again during the ASA 1.3 audit.

Verified by	:	Bayu Yogatama/Rahmat Abdiansyah/ Sentot
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3.4.4. Opportunity for Improvement

No	Ref. Std.	Description
1	3.4.3	<p>The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p> <p>The company has carried out environmental management and monitoring as outlined in the RKL RPL document, for example for the 2nd semester of 2022. Referring to KepmenLH 45 of 2005 concerning Reporting on the Implementation of Environmental Permits, which explains that in writing reports, there must be conformity in the description between the impacts being managed monitored environmental components.</p> <p>In the documents shown, the presentation of the data still contains errors in describing actual and correct management and monitoring results, for example regarding the assessment unit, the latest regulatory references, and the monitoring period on measurement results. The company therefore has the opportunity to ensure proper writing.</p>
2	3.6.1	<p>All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>The company already has an ISBPR document (Identification of Danger Sources of Risk Assessment and Risk Control which is updated in January 2023, but several operational activities have not yet carried out identification of Danger Sources of Risk Assessment and Risk Control, such as census and LSU.</p> <p>Based on this, companies are encouraged to ensure that all operational activities have been identified as Hazardous Sources, Risk Assessment, and Risk Control.</p>
3	3.6.2	<p>The effectiveness of the H&S plan to address health and safety risks to people is monitored</p> <p>OHS license extension that has expired Based on the results of the review of OHS Operator License Monitoring documents, it is known as follows:</p> <ul style="list-style-type: none"> • 5 JLYE lift and lift operator OHS licenses that have expired for the period May and June 2022 • 5 BSRE lift and transport operator OHS licenses that have expired in June 2022. • 3 TLB, grader, compactor OHS operator licenses that have expired in May and July 2022 <p>The company demonstrates the renewal process by showing communication records with the training section at the Head Office and PJK3 since April 2022, as well as showing a statement letter from PJK3 regarding the license extension process at the Ministry of Manpower of the Republic of Indonesia on March 27 2023. The process is quite long, due to process improvements from centralized implementation in the holding company to be local in the area.</p> <p>Creation of a new K3 Operator license As an effort to mechanize operational work, the company has added lift and transport aircraft. In addition, it is known that there are lift operators with OHS licenses who have resigned from the company. Based on this, to meet the requirements for an OHS operator license, the company showed a recording of an agreement for an OHS training institute with the initials IT dated March 28, 2023 regarding the plan to carry out OHS training and certification for lift and lift aircraft operators for 23 people, 3 prime movers, 3 class 2 boiler operators, etc.</p>

		Based on this, companies are encouraged to ensure that the OHS Operator license extension process and OHS Operator license certification can progress positively.
4	4.2.3	<p>The unit of certification keeps parties informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>The company has the opportunity to ensure documentation of responses to complaints submitted.</p>

3.4.5. Noteworthy Positive Components

No	Description
1	Komitmen perusahaan dalam menerapkan sistem pengelolaan kelapa sawit berkelanjutan.
2	Keikutsertaan Perusahaan dalam penilaian PROPER dengan Predikat Biru untuk Periode Tahun 2021-2022 (PT Tapan Nadenggan – Jakluay POM)

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Environment Agency <ul style="list-style-type: none"> The company has completed all environmental permits, for example environmental documents, LA permits, TPS LB3 permits. The company has submitted mandatory reports according to a predetermined time frame, for example <i>RKL RPL</i> semester reports and waste management reports. The <i>RKL RPL</i> report complies with the template matrix There are no complaints related to environmental pollution from the community around the company. 	<p>There is no negative issue needs further clarification.</p>
Land National Office <ul style="list-style-type: none"> The company has submitted reports on the utilization of <i>HGU</i> on a regular basis. There is no indication of abandoned land in the <i>HGU</i> area. There were no reports related to land disputes or conflicts at PT Tapan Nadenggan. There is no change in the <i>HGU</i> area. 	<p>There is no negative issue needs further clarification.</p>
Previous Land Owner of Muara Pantun Village (2 person) dan Kernyanyan Village (1 person) <ul style="list-style-type: none"> The company has provided <i>tali asih</i> for the land that was freed from the community. In addition, the community also participates in plasma cooperative membership. There are no reclaims for the areas that have been cleared. 	<p>There is no negative issue needs further clarification.</p>
Representative of Kernyanyan Village <ul style="list-style-type: none"> Kernyanyan Village is directly adjacent to the company. Communication between the village and the company went well. There are no issues of land disputes and environmental pollution issues. The company has provided CSR assistance in the form of funds. There is no overlap between companies and forest areas or other businesses. The company is currently accepting villagers to work for the company. There is no land fire issue at PT Tapan Nadenggan. 	<p>There is no negative issue needs further clarification.</p>
Gender Committee of Estate dan Mill.	<p>There is no negative issue needs further clarification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> The Gender Committee has a routine posyandu agenda every month and conducts outreach regarding company policies every 3 months. There are no complaints related to immoral acts. The company provides maternity leave and menstruation leave. The company also provides special time for breastfeeding women workers. 	
Worker Union Mandiri <ul style="list-style-type: none"> There are no PKWT and BHL employees in the company. There were no complaints from employees that could not be resolved bipartitely. The company provides PPE to workers and can be replaced if it is damaged. The company has paid workers' wages according to the latest minimum wage. The company already has a wage scale. 	<p>There is no negative issue needs further clarification.</p>
Sawit Prima Jaya Cooperative (Plasma) <p>There is no negative issue. The FFB payment has been made on time in accordance with the provisions in the agreement, based on pricing mechanism from Plantation Agency. No obstacles related to cooperation with the unit of certification, because the UOC is open to consulting related work issues such as transparency in payments, loan and any cost.</p> <p>There is a savings fund that is used as a replanting fund in the future.</p> <p>The company has conducted trainings for cooperative members such as cooperative management training, pesticide training, GAP, and RSPO training.</p>	<p>There was no negative issue that need further verification. The documentation has been shown that the payment of FFB from smallholders has been paid according to the agreement and on time.</p>
Representative of Sri Pantun Village <ul style="list-style-type: none"> Communication between the village and the company is going well. There are no issues of land disputes and environmental pollution issues. The company has provided CSR assistance in the form of funds. There is no overlap between companies and forest areas or other businesses. The company is currently accepting villagers to work for the company. There is no land fire issue at PT Tapian Nadenggan. The company has carried out socialization related to conservation and protection areas for protected animals and flora. 	<p>There is no negative issue needs further clarification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
Manpower Agency <ul style="list-style-type: none"> • There are no complaints or mediation in progress for PT Tapan Nadenggan. • The company has implemented a minimum wage for employee payroll. • The union has been registered with the manpower office and the company has a collective labor agreement. • There are reports regarding work accidents in 2022 or 2023. 	<p>There is no negative issue needs further clarification.</p>
Worker Cooperative “Mitra Mandiri” <ul style="list-style-type: none"> • Cooperative employees engaged in savings and loans with PKS employee members. • The employee cooperative has carried out the RAT for the 2022 financial year in January 2023. • The company provides support to cooperatives such as lending rooms for cooperative meetings and so on. 	<p>There is no negative issue needs further clarification.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Tapian Nadenggan Head of Sustainability Management System and Certification Operations Sustainability</p>  <p><u>Yahya Mustakim</u> Friday, 30 June 2023</p> </div> <div style="text-align: center;"> <p>MUTU International Lead Auditor</p>  <p><u>Rizliani Aprianita Hasibuan</u> Friday, 30 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	Environmental Service	Kutai Timur District	-	Via Phone	29 March 2023	✓	
2	National Land Agency	Kutai Timur District	-	Via Phone	29 March 2023	✓	
3	Manpower Agency	Kutai Timur District	-	Via Phone	29 March 2023		
4	Gender Committee	Kutai Timur District	-	Direct Interview	29 March 2023	✓	
5	Worker Union	Kutai Timur District	-	Direct Interview	29 March 2023	✓	
6	Villages around the Company Interviewees: • Kernyanyan (Village Head) • Sri Pantun Village (Village Head)	Kutai Timur District	-	Direct Interview	29 March 2023	✓	
7	Previous Land Owner	Kutai Timur District	-	Via Phone	29 March 2023	✓	
8	Sawit Prima Jaya Cooperative (Plasma)	Kutai Timur District	-	Via Phone	29 March 2023	✓	
9	Worker Cooperative - Mitra Mandiri	Kutai Timur District	-	Direct Interview	29 March 2023	✓	
14	Jakluay Estate • 4 Harvesters • 4 lossefruit pickers • 8 upkeep workers • Hazardous Officer • Workshop Officer • Central Warehouse Officer • 1 Mechanic • 2 Daycare worker	Kutai Timur District	-	Direct Interview	28 March 2023	✓	
15	Jakluay POM • 2 St. Sterilizer Workers • 1 St. Boiler workers • 1 St. Grading workers • 1 Security Officer • 1 St. WWTP worker • 1 Warehouse worker • 1 Workshop worker • 1 Hazardous Waste Temporary Warehouse worker • 1 Wheel Loader worker • 1 Electrician	Kutai Timur District	-	Direct Interview	28 March 2023	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
16	Pantun Mas Estate <ul style="list-style-type: none"> • 4 Spraying workers • 2 lossefruit picker • 2 harvest workers • 4 Upkeep worker • 1 Daycare worker • 1 Warehouse worker • 1 Workshop worker 	Kutai Timur District	-	Direct Interview	29 March 2023	✓	
17	Long Buluh Estate <ul style="list-style-type: none"> • 2 Spraying workers • 1 loss fruit picker • 1 harvest worker • 4 Upkeep worker • 1 Daycare worker • 1 Warehouse worker • 1 Workshop worker 	Kutai Timur District	-	Direct Interview	29 March 2023	✓	
18	Bukit Subur Estate <ul style="list-style-type: none"> • 6 Spraying workers • 2 loss fruit pickers • 5 harvest workers • 4 Upkeep worker • 1 Daycare worker • 1 Warehouse worker • 1 Workshop worker 	Kutai Timur District	-	Direct Interview	30 March 2023	✓	
19	WWF	Jakarta	wwf-indonesia@wwf.or.id	By Email	21 March 2023		✓
20	AMAN	Jakarta	rumahaman@aman.or.id	By Email	21 March 2023		✓
21	Walhi	Jakarta	informasi@walhi.or.id	By Email	21 March 2023		✓
22	Sawit Watch	Jakarta	info@sawitwatch.or.id	By Email	21 March 2023		✓

Appendix 2. Assessment Program

[illegible]

[illegible]

	Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Implementasi Keselamatan dan Kesehatan Kerja // Implementation of Occupational Health & Safety Aspect	
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	• Tinjauan dokumen dan melengkapi daftar periksa // Document review and completing audit checklist. • Penyampaian progres harian // Presentation of daily progress	All Auditor
Thursday, 30 March 2023		
08.00 – 12.00	Field Observation to Bukit Subur Estate Aspek yang akan diverifikasi // Aspect to be verified: • Implementasi Aspek Legal (Legalitas Kepemilikan Lahan, Tata Batas); // Implementation of Legal Aspect (Land Ownership, Legal Boundaries); • Implementasi Aspek Manajemen Lingkungan dan Konservasi (HCV) // Implementation of Environmental and Conservation/HCV management. • Implementasi Pengelolaan Limbah (Inspeksi Gudang Bahan Kimia, Pupuk, Gudang Limbah B3, Workshop, Fasilitas Pengendali Kebakaran, Klinik, Pengelolaan Sampah dan Limbah) // Implementation of Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Clinic and Waste Management). • Observasi Fasilitas Pekerja (Perumahan, Sekolah, Sarana Ibadah) // Observation of Workers Facilities (Housing, School, Worship Place). • Implementasi Aspek Agronomi (Panen & Transportasi, Pemupukan, Aplikasi Pestisida, Perawatan Jalan, Monitoring Pengendali Hayati, Aplikasi Janjang Kosong) // Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Implementasi Keselamatan dan Kesehatan Kerja // Implementation of Occupational Health & Safety Aspect	AAS RAH/ALS SAS
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	• Tinjauan dokumen dan melengkapi daftar periksa // Document review and completing audit checklist. • Penyampaian progres harian // Presentation of daily progress	All Auditor
Friday, 31 March 2023		
08.00 – 11.30	• Verifikasi dokumen // continue document verification	All Auditor
11.30 – 14.00	Break	All Auditor
14.00 – 17.00	• Melanjutkan Verifikasi dokumen // continue document verification • Diskusi internal persiapan closing meeting // internal discussion for closing meeting	All Auditor
Saturday, 1 April 2023		
07.00 – 08.00 08.00 – 14.00 15.20 – 20.05	• Closing Meeting • Perjalanan dari PT Tapian Nadenggan - Berau // Trip from PT Tapian Nadenggan – Berau • Penerbangan dari Berau – Jakarta (QG1405, QG425) // Flight from Berau – Jakarta (QG1405, QG425)	All Auditor