

***Roundtable on Sustainable Palm Oil Certification
R S P O*****[✓] Surveillance 2.1**

Name of Management Organization : Ladang Panjang POM PT Bahari Gembira Ria subsidiary of Sime Darby Plantation Berhad
Plantation Name : PT Bahari Gembira Ria: Ladang Panjang Estate
Location : Village of Ladang Panjang, Sub District of Sungai Gelam, District of Muaro Jambi, Province of Jambi, Indonesia.
Certificate Code : MUTU-RSPO/019
Date of Initial Registration : 09 July 2012
Date of Last Issue : 13 May 2022 Date of License Issue : 09 September 2023
Date of Certificate Expiry : 08 July 2027 Date of License Expiry : 08 July 2024

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA 2.1	10 – 14 April 2023	Moh Arif Yusni (LA Witnessing), Octo HPN Nainggolan (LA Witnessed), Rindu Galih Rezza, Benli Manurung, Helma Namira	Hasiholan Sihombing	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA 2.1	09 August 2023

PT Mutuagung Lestari • Raya Bogor Km 33,5 Number 19 • Cimanggis • Depok 16953 • Indonesia
Telephone (+62) (21) 8740202 • Fax (+62) (21) 87740745/6 • Email: agri@mutucertification.com •

www.mutucertification.com

MUTU Certification • Accredited by Accreditation Services International
on March 12th, 2014 with registration number *ASI-ACC-05*

TABLE OF CONTENT
FIGURE

Figure 1. Location Map of PT Bahari Gembira Ria	1
Figure 2. Operational Map of Bahari Gembira Ria	2

Abbreviations Used	3
--------------------	---

1.0 SCOPE of the CERTIFICATION ASSESSMENT

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

2.0 ASSESSMENT PROCESS

2.1 Assessment Team	16
2.2 Assessment Methodology, Assessment Process and Locations of Assessment	16
2.3 Stakeholder Consultation and Stakeholders Contacted	19
2.4 Determining Next Assessment	19

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification	20
3.2 Conformity Checklist of Certificate and Logo Use	75
3.3 Summary of RSPO Partial Certification	76
3.4 Identification of Findings, Corrective Actions, Observations, Opportunity for Improvement and Noteworthy Positive Components	79
3.5 Summary of Arising Issues from Public and Auditor Verification	95

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

4.1 Formal Signing of Assessment Findings	100
---	-----

APPENDICES

1. List of Stakeholders Contacted in the RSPO Certification Process	101
2. Assessment Program	102

Figure 1. Location Map of PT Bahari Gembira Ria

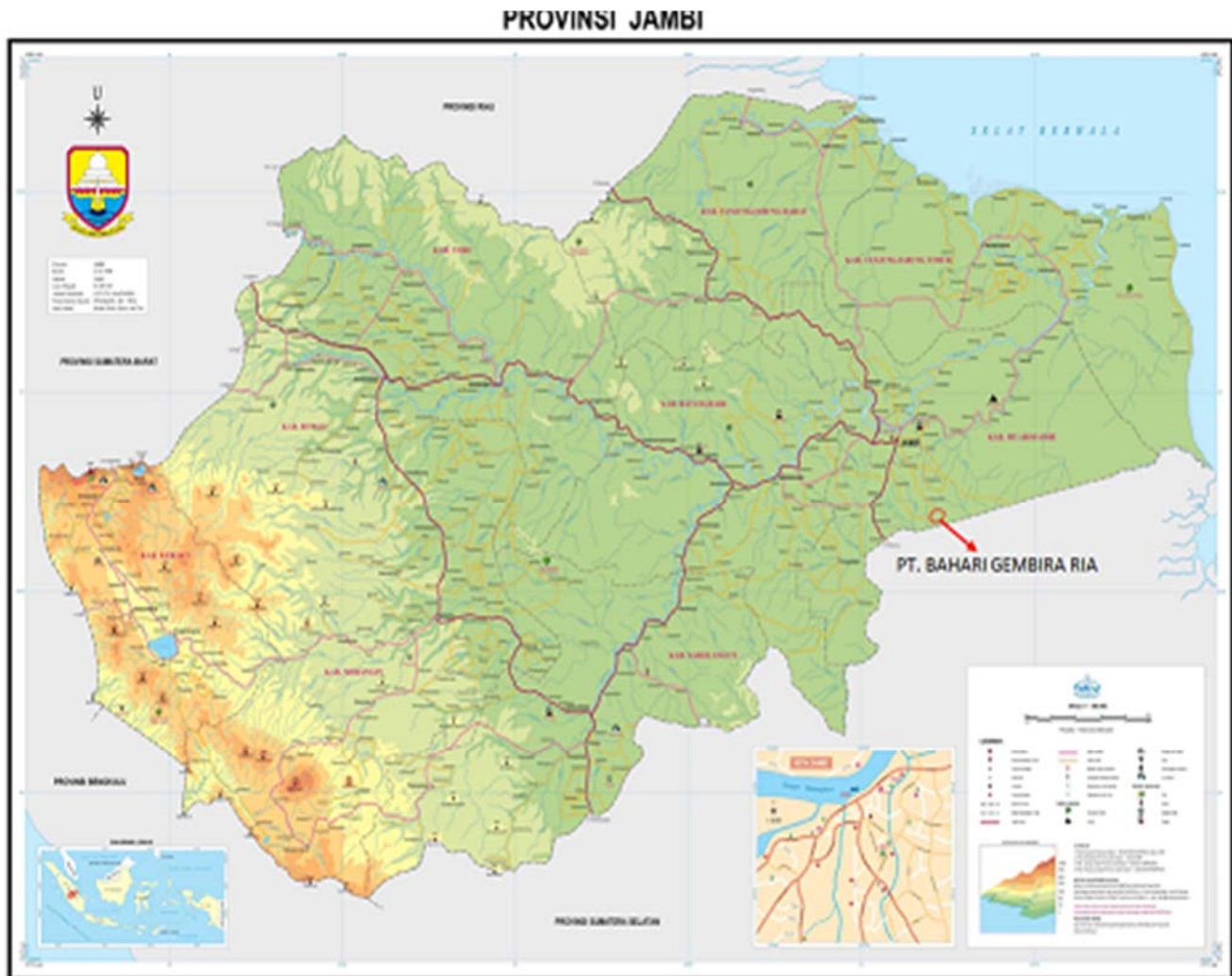
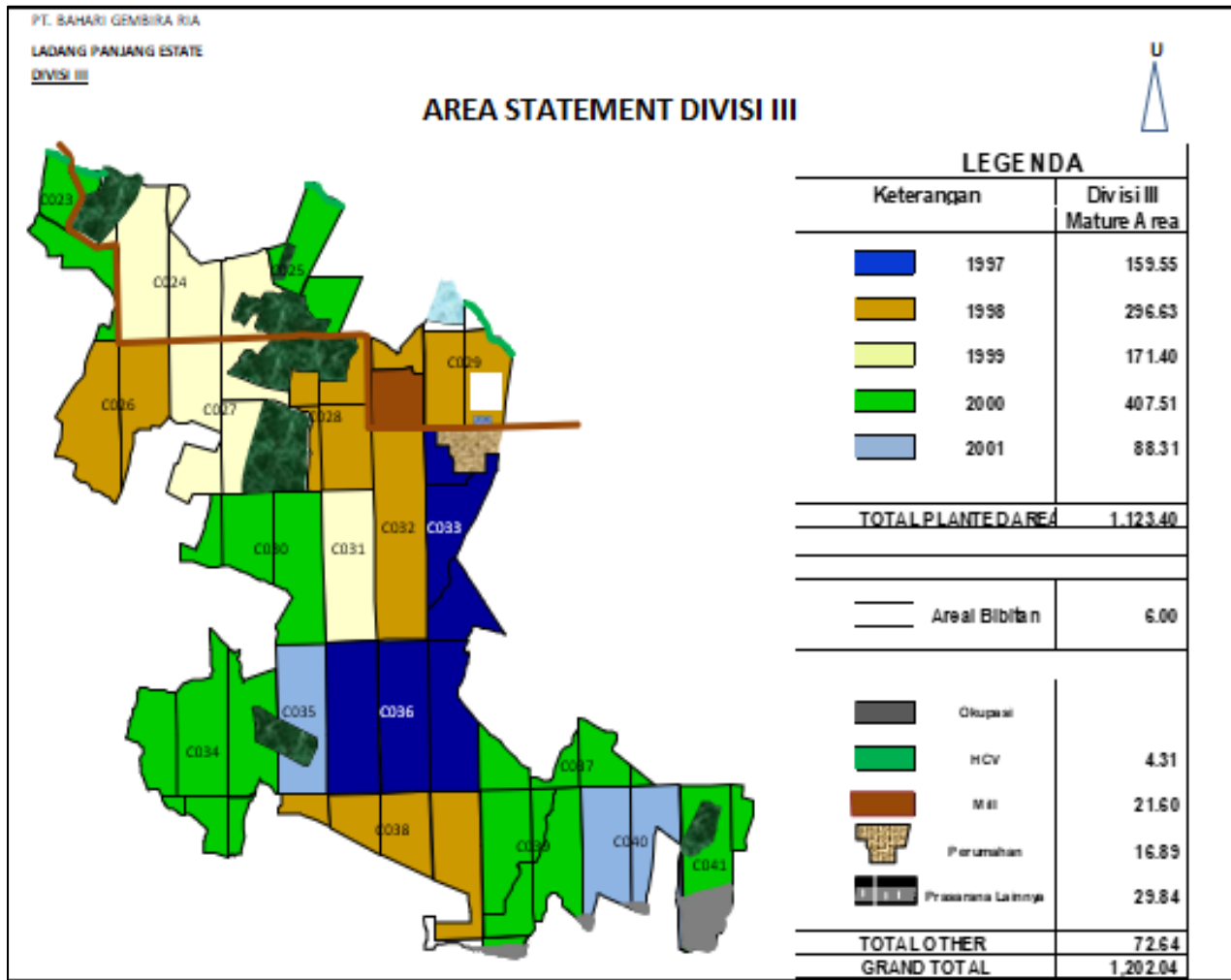


Figure 2. Operational Map of PT Bahari Gembira Ria



Abbreviations Used

ANDAL	:	<i>Analisis Dampak Lingkungan</i> (Environmental Impact Analysis)
APAR	:	<i>Alat Pemadam Api Ringan</i> (Light Fire Extinguisher)
ARM	:	Agronomic Reference Manual
ASA	:	Annual Surveillance Assessment
BGR	:	Bahari Gembira Ria
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Security Agency)
BSS	:	Block Spraying System
CB	:	Certification Body
CEO	:	Chief Executive Officer
CH	:	Certificate Holder
CLA	:	Collective Labor Agreement
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
EFB	:	Empty Fruit Bunches
EHS	:	Environment Health and Safety
EIA	:	Environment Impact Assessment
FFB	:	Fresh Fruit Bunches
GHG	:	Green House Gasses
HCV	:	High Conservation Value
HCVA	:	High Conservation Value Assessment
HGU	:	Hak Guna Usaha (Land Use Title)
HIRAC	:	Hazard Identification Risk Assessment Control
HRM	:	Human Resources Management
ILO	:	International Labor Organization
IPM	:	Integrated Pest Management
ISPO	:	Indonesia Sustainable Plam Oil
KER	:	Kernel Extraction Rate
KK	:	<i>Kepala Keluarga</i> (Head of Family)
KKPA	:	<i>Kredit Koperasi Primer Anggota</i> (Member Primary Cooperative Credit)
KUD	:	<i>Koperasi Unit Desa</i> (Village Cooperative)
LA	:	Land Application
LCC	:	Legume Cover Crop
LD50	:	Lethal Dosage 50
LK3P	:	<i>Lembar Kertas Kerja Kesimpulan Pemeriksaan</i> (Audit Working Paper Sheet)
LPE	:	Ladang Panjang Estate
LPF	:	Ladang Panjang Factory
LSU	:	Leaf Sampling Unit
LTI	:	Lost Time Incident
LUCA	:	Land Use Change Analysis
MMCM	:	Monthly Meeting Committee Management
MRC	:	Minamas Research Centre
MSDS	:	Material Safety Data Sheet
NGO	:	Non-Government Organization
OC	:	Operation Control
OER	:	Oil Extraction Rate

OFI	:	Opportunity For Improvement
OHS	:	Occupational Health and Safety
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> (OHS Committee)
PAD	:	<i>Pendapatan Asli Daerah</i> (Locally-generated revenue)
PIC	:	Person In Charge
PK	:	Palm Kernel
PKB	:	<i>Perjanjian Kerja Bersama</i> (Collective Labour Agreement)
PMU	:	Performance Management Unit
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PSQM	:	Plantation Sustainability and Quality Management
PT BGR	:	PT Bahari Gembira Ria
RACP	:	Remediation and Compensation Procedure
RKL / RPL	:	<i>Rencana Pengelolaan Lingkungan/Rencana Pemantauan Lingkungan</i> (Environmental Management and Monitoring Plan)
RSPO	:	Roundtable on Sustainable Palm Oil
RSS	:	Riau and Sumatera Selatan
RSSJ	:	Riau Selatan, Sumatera Selatan and Jambi
RTE	:	Rare, Threatened, Endangered
SCCS	:	Supply Chain Certification System
SDP	:	Sime Darby Plantation
SHM	:	<i>Sertifikat Hak Milik</i> (Freehold Title)
SIA	:	Social Impact Assessment
SMK3	:	<i>Sistem Manajemen Kesehatan dan Keselamatan Kerja</i> (Occupational Health and Safety Management System)
SOP	:	Standard Operating Procedure
SPSI	:	<i>Serikat Pekerja Seluruh Indonesia</i> (Indonesian Trade Unions)
SSU	:	Soil Sampling Unit
TBS	:	<i>Tandan Buah Segar</i> (Fresh Fruit Bunch)
WHO	:	World Health Organization
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 Bahari Gembira Ria subsidiary of Sime Darby Plantation Berhad.	
1.2.2	Contact person	Alagendran Maniam	
1.2.3	Organisation address and site address	<p>RSPO registered company: No 2, Plantation Tower, PJU 1A/7Street, Petaling Jaya, Malaysia 47301</p> <p>Liaison Office: The Plaza Office Tower, 36 Floor, JL. MH Thamrin Kav. 28-30, Jakarta 10350, Indonesia</p>	
1.2.4	Telephone	+6221 - 29926000	
1.2.5	Fax	+6221 – 29922686	
1.2.6	E-mail	alagendran.maniam@sime-darbyplantation.com	
1.2.7	Web page address	www.sime-darby.com	
1.2.8	Management Representative who completed the application for certification	Alagendran Maniam (Head Sustainability)	
1.2.9	Registered as RSPO member	1-0008-04-000-00, 7 September 2004	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: Ladang Panjang POM and Ladang Panjang Estate	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Ladang Panjang POM	Ladang Panjang Village, Sungai Gelam Sub District, Muaro Jambi District, Jambi Province, Indonesia	S 01° 47' 33" E 103° 47' 37"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude

	Ladang Panjang Estate (Division III)	Ladang Panjang Village, Sungai Gelam Sub District, Muaro Jambi District, Jambi Province, Indonesia	S 01° 47' 39"	E 103° 47' 58"			
1.5	Description of Area Statement						
1.5.1	Tenure						
	• State		1,202.04 Ha				
	• Community		- Ha				
1.5.2	Area Statement						
	• Total area		1,202.04 Ha				
	• Mature area		1,084.75 Ha				
	• Building site		18.96 Ha				
	• Mill		21.60 Ha				
	• Nursery		6.00 Ha				
	• HCV Area		4.31 Ha				
	• Occupation		43.60 Ha				
	• Main Road		5.10 Ha				
	• Collection Road		17.81 Ha				
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)					
		Ladang Panjang Estate	Total				
	1997	159.55	159.55				
	1998	294.78	294.78				
	1999	171.40	171.40				
	2000	373.19	373.19				
	2001	85.83	85.83				
	Sub Total Mature	1,084.75	1,084.75				
	TOTAL	1,084.75	1,084.75				
1.6.2	New Planting area after January 2010		0 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 (tons/ hour)	FFB Processed (tons/year)	CPO		Palm Kernel	
				Out put (tons)	Extraction (%)	Out put (tons)	Extraction (%)
	Ladang Panjang POM	30	95,254.46	19,331.27	20.29	4,073.23	4.28

	<i>*Production data source from 12 Months Before Assessment (April 2022 – March 2023)</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted (Ha)	FFB (tons/year)	Yield (tons/ha/ year)	Supplied to Mill	
						FFB (tons/year)	%
	Ladang Panjang Estate (Division III)	1,202.04	1,084.75	23,223.83	21.41	23,223.83	100
	TOTAL	1,202.04	1,084.75	23,223.83	21.41	23,223.83	100
	<i>*Production data source from 12 Months Before Assessment (April 2022 – March 2023)</i>						
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 (tons/year)		
	Ladang Panjang Estate (Division I & II) (Non-Certified)	PT BGR	-	1,796.19	19,769.20		
	KUD Karya Maju (Non-Certified)	Plasma of PT BGR	448.00	910.75	1,465.84		
	KUD Marga Jaya (Non-Certified)	Plasma of PT BGR	636.00	1,248.29	12,732.01		
	KUD Manggar Jaya (Non- Certified)	Plasma of PT BGR	896.00	1,743.01	503.18		
	KUD Mitra Inti (Non-Certified)	Plasma of PT BGR	415.00	828.58	15,403.06		
	KUD Karya Mandiri (Non- Certified)	Plasma of PT BGR	541.00	1,066.37	22,394.02		
	TOTAL					72,267.31	
	<i>*Production data source from 12 Months Before Assessment (April 2022 – March 2023)</i>						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT) (09 July 2022 - 08 July 2023		Last Year Actual Certified Volume (April 2022 – May 2023) (MT)		
	FFB Processed		29,500		23,223.83		
	CPO Production		6,350		4,704.69		
	Palm Kernel (PK) Production		1,450		992.83		
1.8.2	Product selling						
	Type of selling product		Actual selling product for last year (April 2022 – May 2023) (MT)				
	CSPO sold as RSPO certified product		0				
	CSPK sold as RSPO certified product		0				
	CSPO sold under other scheme		0				
	CSPK sold under other scheme		0				
	CSPO sold as conventional		4,490.23				

	CSPK sold as conventional					941.54		
1.8.3	Estimate of Certified FFB Claim							
	Name of Estate		Total Area (Ha)	Planted (Ha)		FFB (tons/year)	Yield (tons/ha/year)	
	Ladang Panjang Estate		1,202.04	1,084.75		25,000	23.05	
	TOTAL		1,202.04	1,084.75		25,000	23.05	
*Projected FFB production for 12 months of next license								
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tons/ hour)	FFB Processed (tons/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tons)	Extraction (%)	Out put (tons)	Extraction (%)	
	Ladang Panjang POM	30	25,000	5,375	21.50	1,125	4.50	MB
*Projected CSPO and CSPK production for 12 months of next license								
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			-				
	Others			ISPO With certificate number MUTU-ISPO/069 valid until 05 December 2027				
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						
	INDONESIA							
1	Sekunyir. PT. Indotruba Tengah	2010	Sekunyir	2010	Seruyan and West Kotawaringin District – Central Kalimantan	Certified		
			Seruyan	2010		Certified		
2	Manggala. PT. Tunggal Mitra Plantations	2010	Manggala 1	2010	Rokan Hilir District – Riau	Certified		
			Manggala 2	2010		Certified		
			Manggala 3	2010		Certified		
3	Bukit Ajong PT. Sime Indo Agro	2010	West	2010	Sanggau District –West Kalimantan	Certified		
			West (HGU on process)	2019		-		
			East	2010		Certified		
			East (HGU on process)	2023		-		
			East Plasma	2010		Certified		
			West Plasma	2010		Certified		
Sei Mawang	2023	-						

4	Teluk Siak. PT Aneka Inti Persada	2011	Teluk Siak	2011	Siak District – Riau	Certified
			Pinang Sebatang	2011		Certified
			Aneka Persada	2011		Certified
5	Sungai Pinang. PT. Bina Sains Cemerlang	2012	Sungai Pinang	2012	Musi Rawas District – South Sumatera	Certified
			Sungai Pinang (HGU on process)	2023		-
			Bukit Pinang	2012		Certified
			Bukit Pinang (HGU on process)	2023		-
6	Pematang. PT. Teguh Sempurna	2011	Pematang	2011	Seruyan and East Kotawaringin District – Central Kalimantan	Certified
			Kawan Batu	2011		Certified
			Hatan Tiring	2011		Certified
			Batang Garing	2011		Certified
7	Alur Dumai. PT Lahan Tani Sakti	2011	Alur Dumai	2011	Rokan Hilir District – Riau	Certified
8	Teluk Bakau. PT. Bhumireksa Nusasejati	2011	Teluk Bakau	2011	Indra Giri Hilir District – Riau	Certified
			Nusa Perkasa	2011		Certified
			Nusa Lestari	2011		Certified
9	Mandah PT. Bhumireksa Nusasejati	2014	Mandah	2011	Indra Giri Hilir District – Riau	Certified
10	Angsana. PT Ladangrumpun Suburabadi	2011	Rotan Semelur	2011	Tanah Bumbu District – South Kalimantan	Certified
			Angsana	2011		Certified
			Gunung Sari	2011		Certified
			Pantai Bonati	2011		Certified
			KKPA-1 PT.SHE	2013		Certified
			KKPA-4 PT.SHE	2013		Certified
11	Mustika. PT Sajang Heulang	2013	Mustika	2013	Tanah Bumbu District – South Kalimantan	Certified
			KKPA-2 PT.SHE	2013		Certified
			KKPA-3 PT.SHE	2013		Certified
			KKPA-5 PT.SHE	2013		Certified
			SAP 1	2023		-
12	Gunung Aru. PT Bersama Sejahtera Sakti	2011	Gunung Aru	2011	Kotabaru District – South Kalimantan	Certified
			Gunung Kemas	2011		Certified
			Laut Timur	2011		Certified
			Pantai Timur	2011		Certified
			KKPA BSS	2023		-
13	Bebunga. PT. Langgeng Muaramakmur	2011	Bebunga	2011	Kotabaru District – South Kalimantan	Certified
			Bakau	2011		Certified
			Sungai Cengal	2011		Certified
14	Sukamandang PT Kridatama Lancar	2011	Sukamandang	2011	Seruyan and East Kotawaringin District – Central Kalimantan	Certified
			Sapiri	2011		Certified
			Barasdanum	2011		Certified
			Kuala Kuayan	2011		Certified
15	Pondok Labu. PT Paripurna Swakarsa	2012	Binturung	2012	Kotabaru District – South Kalimantan	Certified
			Pondok Labu	2012		Certified
			Rampa	2012		Certified

			Sesulung	2012		Certified
16	Rantau. PT Laguna Mandiri	2012	Rantau	2012	Kotabaru District – South Kalimantan	Certified
			Matalok	2012		Certified
			KKPA Sungai Cengal (1,382 SH)	2014		Certified
			Selabak (PT SAA)	2012		Certified
			Randi (PT SAA)	2012		Certified
			Sangkoh (PT SAA)	2012		Certified
			Lanting (PT LMR)	2012		Certified
17	Betung. PT Laguna Mandiri	2014	Betung	2012	Kotabaru District – South Kalimantan	Certified
			Sekayu	2012		Certified
18	Ungkaya. PT Tamaco Graha Krida	2012	Ungkaya	2012	Morowali District – Sulawesi Tengah	Certified
			Plasma TGK	2023		-
19	Ladang Panjang. PT Bahari Gembira Ria	2012	Ladang Panjang	2012	Muaro Jambi District - Jambi	Certified
			Ladang Panjang (HGU on process)	2023		-
			Plasma BGR	2023		-
20	Rantau Panjang. PT Guthrie Pecconina Indonesia	2012	Rantau Panjang	2012	Musi Banyuasin District – South Sumatera	Certified
			Rantau Panjang (HGU on process)	2023		-
			Bumi Ayu	2012		Certified
			Karang Ringin	2012		Certified
			Napal	2012		Certified
			Napal (HGU on process)	2023		-
			Mangun Jaya	2012		Certified
			Mangun Jaya (HGU on process)	2023		-
			Sungai Jernih	2023		-
			GPI KKPA	2023		-
21	Blang Simpo. PT Perkasa Subur Sakti	2013	Tamiang (PT PPP)	2013	Aceh Tamiang and East Aceh District – Aceh	Certified
			Batang Ara (PT PSK)	2013		Certified
			Blang Simpo-01	2013		Certified
			Blang Simpo-02	2013		Certified
22	Lembiru. PT Sandika Nata Palma	2014	Lembiru	2014	Ketapang District – West Kalimantan	Certified
			Awatan	2014		Certified
			Karya Palma	2023		-
			KKPA SNP	2023		-
			Pelanjau (PT BAL)	2019		Certified
			Sungai Putih (PT BAL)	2023		-
			Baturus (PT BAL)	2023		-
			KKPA BAL	2023		-
MALAYSIA						
1	Sg Dingin SOU 1	2010	Bukit Hijau	2010	Kerangan, Kedah	Certified
			Padang Buluh	2010		Certified
			Bukit Selangor	2010		Certified
			Sg Dingin	2010		Certified

			Jentayu	2010		Certified
			Anak Kuli	2010		Certified
			Somme	2010		Certified
2	Chersonese SOU 2	2011	Chersonese	2011	Kuala Kurau, Perak	Certified
			Holyrood	2011		Certified
			Kalumpang	2011		Certified
			Tali Ayer	2011		Certified
3	Elphil SOU 3	2011	Kinta Kellas	2011	Sg Siput, Perak	Certified
			Elphil	2011		Certified
			Kamuning	2011		Certified
4	Flemington SOU 4	2011	Flemington	2011	Teluk Intan, Perak	Certified
			Bagan Datoh	2011		Certified
			Sabak Bernam	2011		Certified
			Sg Samak	2011		Certified
5	Seri Intan SOU 5	2011	Seri Intan (Main Division)	2011	Teluk Intan, Perak	Certified
			Sabrang	2011		Certified
			Sg Wangi	2011		Certified
			Sogomana (Main Division)	2011		Certified
6	Selaba SOU 5	2011	Seri Intan (Selaba Division)	2011	Teluk Intan, Perak	Certified
			Sogomana (Cashwood & Sg Beruas Division)	2011		Certified
			Bikam	2011		Certified
			Clumy	2011		Certified
7	Tennamaram SOU 6	2011	Tennamaram	2011	Bestari Jaya, Selangor	Certified
			Sungei Buloh	2011		Certified
			Bkt Talang	2011		Certified
8	Bkt Kerayong SOU 7	2011	Bkt Kerayong	2011	Kapar, Selangor	Certified
			Bkt Cherakah	2011		Certified
			Bkt Rajah	2011		Certified
			Bkt Lagong	2011		Certified
			Elmina	2011		Certified
9	East SOU 8	2010	East	2010	Carey Island, Selangor	Certified
			Dusun Durian	2010		Certified
			Sepang	2010		Certified
10	West - SOU 9	2010	West	2010	Carey Island, Selangor	Certified
11	Bukit Putri - SOU 10	2011	Bukit Putri	2011	Raub, Pahang	Certified
12	Kerdau SOU 11	2011	Kerdau	2011	Temerloh, Pahang	Certified
			Jentar	2011		Certified
			Mentakab	2011		Certified
			Sg Mai	2011		Certified
			Chenor	2011		Certified
13	Jabor - SOU 12	2011	Jabor	2011	Kemaman, Trengganu	Certified
14	Labu SOU 13	2011	Labu	2011	Nilai, Negeri Sembilan	Certified
			New Labu	2011		Certified
			Bradwall	2011		Certified

15	Tanah Merah SOU 14	2010	Tanah Merah	2010	Port Dickson, Negeri Sembilan	Certified
			Sua Betong	2010		Certified
			Bukit Pelandok	2010		Certified
16	Sua Betong SOU 15	2014	Salak	2014	Port Dickson, Negeri Sembilan	Certified
			Sengkang	2014		Certified
			Siliau	2014		Certified
			PD Lukut	2014		Certified
			Sungai Baru	2014		Certified
			Tampin Linggi	2014		Certified
17	Kok Foh SOU 16	2011	Bukit Pilah	2011	Bahau, Negeri Sembilan	Certified
			Kok Foh	2011		Certified
			Muar River	2011		Certified
			St. Helier	2011		Certified
			Pertang	2011		Certified
			Sg Gemas	2011		Certified
			Sg Sebalang	2011		Certified
			Sg Senarut	2011		Certified
18	Kempas SOU 17	2010	Kempas	2010	Jasin, Melaka	Certified
			Kemuning	2010		Certified
			Tangkah	2010		Certified
19	Diamond Jubilee SOU 18	2011	Bukit Asahan	2011	Jasin, Melaka	Certified
			Diamond Jubilee	2011		Certified
			Serkam	2011		Certified
20	Pagoh SOU 19	2014	Pagoh	2014	Muar, Johor	Certified
			Lanadron	2014		Certified
			Pengkalan Bukit	2014		Certified
			Welch	2014		Certified
21	Chaah SOU 20	2010	North Labis	2010	Chaah, Johor	Certified
			Cha'ah	2010		Certified
			Sg Simpang Kiri	2010		Certified
22	Gunung Mas SOU 21	2010	Gunung Mas	2010	Kluang, Johor	Certified
			Kempas Klebang	2010		Certified
			Bukit Paloh	2010		Certified
			Yong Peng	2010		Certified
23	Bukit Benut SOU 22	2011	Bukit Benut	2011	Kluang, Johor	Certified
			CEP Niyor	2011		Certified
			Lambak / Elaeis	2011		Certified
24	Ulu Remis SOU 23	2011	Pekan	2011	Layang-layang, Johor	Certified
			Sembrong	2011		Certified
			Tun Dr. Ismail	2011		Certified
			Ulu Remis	2011		Certified
			Bukit Badak	2011		Certified
			Cenas	2011		Certified
25	Hadapan SOU 24	2011	CEP Rengam	2011	Layang-layang, Johor	Certified
			Kulai	2011		Certified
			Layang	2011		Certified
			Seri Pulai	2011		Certified
26	Sandakan Bay	2008	Tun Tan Siew Sin	2008	Sandakan, Sabah	Certified

	SOU 26		Tunku	2008		Certified
			Tigowis	2008		Certified
			Sentosa	2008		Certified
			Saguliud	2008		Certified
27	Melalap SOU 27	2011	Melalap	2011	Tenom, Sabah	Certified
			Sapong	2011		Certified
28	Binuang SOU 28	2009	Tingkeyu	2009	Kunak, Sabah	Certified
			Sungang	2009		Certified
			Jelata Bumi	2009		Certified
			Binuang	2009		Certified
29	Giram SOU 29	2009	Mostyn	2009	Kunak, Sabah	Certified
			Giram	2009		Certified
30	Merotai SOU 30	2009	Imam	2009	Tawau, Sabah	Certified
			Merotai	2009		Certified
			Table	2009		Certified
			Tiger	2009		Certified
31	Lavang SOU 31	2011	Belian	2011	Bintulu, Serawak	Certified
			Kelida	2011		Certified
			Lavang	2011		Certified
			Lavang (SE)	2011		Certified
			Rasan	2011		Certified
			Chartquest	2011		Certified
			Dulang	2011		Certified
			Peroh	2011		Certified
			Pekaka	2011		Certified
			Ruai	2011		Certified
32	Rajawali SOU 32	2011	Rajawali	2011	Bintulu, Serawak	Certified
			Samudera	2011		Certified
			Semarak	2011		Certified
			Bayu	2011		Certified
33	Derawan SOU 33	2011	Takau	2011	Bintulu, Serawak	Certified
			Damai	2011		Certified
			Derawan	2011		Certified
			Sahua	2011		Certified
	P & G (New Britain Palm Oil)					
1	Poliamba	2012	Kara	2012	Kevieng, New Ireland Province, P&G	Certified
			West Coast	2012		Certified
			Nalik	2012		Certified
			Noatsi	2012		Certified
			Madak	2012		Certified
			North (Smallholders)	2012		Certified
			South (Smallholders)	2012		Certified
			West (Smallholders)	2012		Certified
2	Tetere	2011	Tetere	2011	Gudaicanal, Slomon Island	Certified
			Ngalimbiu	2011		Certified
			Mbalisuna	2011		Certified

			West Zone (Smallholders)	2011		Certified
			Central Zone (Smallholders)	2011		Certified
			MBA East (Smallholders)	2011		Certified
			MBA West (Smallholders)	2011		Certified
3	Sangara, Sambiripa & Mamba	2013	Sangara	2013	Higaturu, Popondetta, Oro, P&G	Certified
			Sumberipa	2013		Certified
			Ambogo	2013		Certified
			Embi	2013		Certified
			Mamba	2013		Certified
			Sorovi (smallholders)	2013		Certified
			Igora (smallholders)	2013		Certified
			Saiho (smallholders)	2013		Certified
			Aeka (smallholders)	2013		Certified
			Ilimo (smallholders)	2013		Certified
4	Gusap	2010	Dumpu	2010	Madang, P&G	Certified
			Surinam	2010		Certified
			Jephcott	2010		Certified
			Gusap	2010		Certified
			Paddox	2010		Certified
			Ngaru	2010		Certified
			Madang VOP (smallholders)	2010		Certified
			Morobe VOP (smallholders)	2010		Certified
5	Hagita	2013	Giligili	2013	Milne Bay, P&G	Certified
			Hagita	2013		Certified
			Waigani	2013		Certified
			Sagarai	2013		Certified
			Padipadi	2013		Certified
			Mariawatte	2013		Certified
			East Gurney	2013		Certified
			West Gurney	2013		Certified
			East Sagarai	2013		Certified
			West Sagarai	2013		Certified
6	Mosa Kumbango Kapiura Namumdo Waraston	2008	Bebere	2008	West New Britain	Certified
			Kumbango	2008		Certified
			Togulo	2008		Certified
			Dami	2008		Certified
			Waisisi	2008		Certified
			Kautu	2008		Certified
			Karaus	2008		Certified
			Moroa	2008		Certified
			Bilomi	2008		Certified
			Loata	2008		Certified
			Haella	2008		Certified
			Garu	2008		Certified

			Daliavu	2008		Certified
			Sapuri	2008		Certified
			Malilimi	2008		Certified
			Rigula	2008		Certified
			Nomundo	2008		Certified
7			Navarai / Karato ME	2008		Certified
			Volupai. Lotomgam / Natupi / Goruru	2008		Certified
			Lolokoru	2008		Certified
			Silovoti	2008		Certified
			LSS Hoskin (1,877 Smallholders)	2008		Certified
			VOP East (1,815 Smallholders)	2008		Certified
			VOP Central (1,958 Smallholders)	2008		Certified
			VOP West (1,277 Smallholders) Kaulong / Akamie / Pusiki / Repamira / Sakapei / KDC ME (21 large smallholders)	2008		Certified
			LSS Kapiura (847 Smallholders)	2008		Certified
			VOP Kapiura (551 Smallholders)	2008		Certified
	<p><i>*TBP on June 2022.</i></p> <p>Sime Darby has achieved 34 management units in Malaysia, 25 management units in Indonesia, 10 management units in P&G that RSPO certified. Total management unit in Sime Darby Plantation Berhad are 34 in Malaysia, 25 in Indonesia and 10 in P&G. There is change of time bound plan, with detail:</p> <ol style="list-style-type: none"> 1. Uncertified area in PT Sime Indo Agro: postpone become 2023 due to HGU process 2. Uncertified area in PT Bina Sains Cemerlang: postpone become 2023 due to HGU process 3. Uncertified area in PT Bahari Gembira Ria: postpone become 2023 due to HGU process 4. Uncertified area in PT Budidaya Agro Lestari: postpone become 2023 due to HGU process 5. For Liberia operations: As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI). <p>https://www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operation</p>					
1.10.2	Progress of Associated Smallholders and Outrowers for Certifiable Standard					
	All smallholder cooperatives of PT BGR have become independent smallholders because all debts have been settled and currently only have cooperation in buying and selling FFB to PT BGR					

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA 2.1	<p>1. Octo HPN Nainggolan (Lead Auditor Witnessing) Indonesian citizen, Bachelor of Agriculture, majoring in Agricultural Socio-Economic (Agribusiness). Seven years of experience working since 2004 in oil palm plantation companies in Indonesia and participated in several trainings, namely: Nature Conservation Training and Biological Resources in HCV support, Basic Plantation Management Program, Integrated Pest Management training, Management System Certification (ISO 9001-2008 / SNI 19011 -9001:2008), Environmental Management System (ISO 14001:2004), OHSAS based SMK3, RSPO Lead Auditor Course supported by Proforest and Wild Asia, Indonesian Sustainable Palm Oil (ISPO) Lead Auditor training course, supply chain certification system training and Lead training RSPO Renewable Energy Directive auditors. He currently works as an auditor at the Certification Body. During the audit he witnesses the team.</p> <p>2. Moh. Arif Yusni (Lead Auditor Witnessed). Indonesian citizen. Bachelor of Agriculture, majoring in Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor course in 2014, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, RSPO and ISPO Lead auditor refresher course in 2021 etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. During the audit, he verified Legality, TBP, Partial certification, environment aspect, waste management, GHG and conservation.</p> <p>3. Benli Manurung (Auditor). Bachelor of Agriculture Majoring in Soil Science. He has more than 4 years of experience as a plantation operations staff in a private oil palm plantation company in Indonesia. The training he has attended include: ISPO, RSPO, Lead auditor of ISO 9001: 2015; ISO 14001; 2015, IHT Health & Safety Aspect and Best Management Practice. Has participated in several audit activities since 2016 in the field of Best Management Practice, Health & Safety Aspect and Worker Welfare. During the audit, he verified Best Management Practice and OHS aspects.</p> <p>4. Rindu Galih Rezza Rachmansyah (Auditor) Indonesian citizen, Bachelor of Agriculture with major in Plant Pest and Disease. Has one year experience as Field Expert in Pesticide Company and 3 years' experience in Industrial Forest Management, Forest Rehabilitation and Reclamation on Indonesia Stated Owned Company as Assistant. Training which had attended included Lead Auditor ISO 9001, ISO 14001, ISO 17021, ISO 19011, SA 8000, Lead Auditor ISPO, Lead Auditor RSPO, RaCP & NPP Awareness and OHSAS 18001:2007. Has been involved in several audit activities related to sustainable palm oil since 2017 in the aspects of Best Management Practices (BMP), social, worker welfare and OHS. During the audit, he verified worker welfare, SCCS and social aspects.</p> <p>5. Helma Namira (Auditor Trainee). Indonesian citizen, Bachelor of Science, majoring in Biology, University of Indonesia. Has 2 years experiences working in Health Safety Security Environment (HSSE) Refinery in one of Oil & Gas Company in Indonesia. Attended trainings are Awareness ISO 19011: 2018; Awareness ISO 9001:2015, Awareness ISO 17021:2015, IHT Awareness ISO 17065:2012, IHT Awareness ISO 14001:2015, IHT Awareness IHT ISO 45001:2018, IHT Awareness ISPO P&C Certification System, IHT Awareness RSPO, Training ISPO Regulation of the Minister of Agriculture 38 in 2020. During this audit, she was assigned to verify Environment, GHG, and HCV aspects 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 2.1	<p>Number of auditors: 3 auditors and 1 auditor trainee</p> <p>Number of days for ASA 2.1 onsite audit: 4.5 days</p>

	Number of working days for ASA 2.1 onsite audit: 13.5 working days
2.2.2	Assessment Process
ASA 2.1	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Bahari Gembira Ria to the requirements of</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 scope of certification of PT Bahari Gembira Ria consist of one mill (Ladang Panjang Mill) and one Estate (Ladang Panjang Estate)</p> <p>The audit program is included as Appendix 2. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Public Stakeholder Notification was made on RSPO and Mutu Website. There is no written negative feedback received. Stakeholder consultation involved internal and external stakeholders. Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings. The comments made by external stakeholders were also taken into account in the assessment.</p> <p>Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix I.</p> <p>Commonly, the audit activities went smoothly with good cooperation from the unit management. The presentation of documents is presented quite well by involving related personnel. All information obtained was recorded in the Check List of PT Mutuagung Lestari (MUTU). The assessment program please find Appendix 2.</p>
2.2.3	Locations of Assessment
ASA 2.1	<p>The sampling method used by the Auditor team is based on the area that represents each operating area, consideration of issues arising from the results of document review, and stakeholder consultations that are fundamental and crucial.</p> <p>The locations visited in full are presented as follows:</p> <p><u>Ladang Panjang POM</u></p> <ul style="list-style-type: none"> • Security Post. Observations and interviews related to work procedures, OHS, worker welfare, complaint mechanisms. • Water Treatment Plant. Observations and interviews on clean water treatment, OHS and environmental aspects.

- Waste Water Treatment Plant. Observation about condition and interview with WWTP operator about his job description and its management.
- Temporary Hazardous Waste Storage. Observation for OHS, waste disposal, and environmental aspects.
- Chemical Storage. Observation and interview with workers related to chemical management, OHS, and environmental aspect.
- Fuel and Oil Storage. Observation and interview with workers related to storage activity, OHS, environmental and worker welfare aspect.
- Spare part and PPE Storage. Observation and interview with workers related to storage activity, OHS, environmental and worker welfare aspect.
- Grading Station. Observations and interviews related to work procedures, OHS, worker welfare, complaint mechanisms and environmental management.
- Loading Ramp Station. Observations and interviews related to work procedures, OHS, worker welfare, complaint mechanisms and environmental management.
- Sterilizer Station. Observations and interviews related to work procedures, OHS, worker welfare, complaint mechanisms and environmental management.
- Press Station. Observations and interviews related to work procedures, OHS, worker welfare, complaint mechanisms and environmental management.
- Hosting Crane Station. Observations and interviews related to work procedures, OHS, worker welfare, complaint mechanisms and environmental management.
- Boiler and Engine Room Station. The auditor only conducts field observations and cannot conduct interviews with
- Hydrant Simulation. Observation related emergency response, readiness of firefighting equipment.
- Thresher Station. Observations and interviews related to work procedures, OHS, worker welfare, complaint mechanisms and environmental management.

Ladang Panjang Estate

- Security Post. Observations and interviews related to work procedures, OHS, worker welfare, complaint mechanisms.
- Housing Complex at Division 3. Observations and interviews with housing residents related to worker welfare facilities and domestic waste management.
- Daycare at Division 3. Observations and interviews related to work procedures, employment systems, OSH, environmental aspects and grievance mechanisms.
- Block Spraying System (BSS) House at Division 3. Observations and interviews related to work procedures, employment systems, OSH, environmental aspects and grievance mechanisms.
- Block Manuring System (BMS) House at Division 3. Observations and interviews related to work procedures, employment systems, OSH, environmental aspects and grievance mechanisms.
- Land Application Block A007. Observation related implementation of procedure, and potential of pollution.
- Oil storage. Observation about storage condition, MSDS, OHS implementation, emergency facility, and material stock.
- Agrochemical storage. Observation about storage condition, agrochemical stock, OHS implementation and work procedure.
- Fertilizer storage. Observation about storage condition, fertilizer stock, and OHS implementation.
- Fertilizer storage. Observation about storage condition, fertilizer stock, and OHS implementation.
- Fuel and Diesel Tank. Observation for material handling and OHS.
- Workshop. Observations related to the management and implementation of health safety, and social worker.
- Loose Fruit Picker Worker Block CO34. Observation and interviews with foreman and worker, worker welfare OHS, and employment.
- Barn Owl Box, Block CO34 Observations regarding the condition of the owl cage, the effectiveness of the owl cage for rat control.

- Harvesting Worker, Block C034. Observations and interviews with workers related to the work system, employment aspects, health checks, and safe work practices.
- Spraying Worker Block 31. Observations and interviews with workers related to implementation of procedure, OHS and environmental aspect.
- Empty Bunch Application in Block 31. Observations and interviews related to work procedures, OHS, worker welfare, complaint mechanisms and environmental management.
- HGU Pole No. 02 BGR at Blok C025. Observations related to the legal boundaries of the company's operational land.
- HGU Pole No. 03 BGR at Blok C023. Observations related to the legal boundaries of the company's operational land.
- HGU Pole No. 04 BGR at Blok C026. Observations related to the legal boundaries of the company's operational land.
- HGU Pole No. 05 BGR at Blok C030. Observations related to the legal boundaries of the company's operational land.
- Terantang River Riparian at Blok C025. Observations related to conservation area management.
- Terantang River Riparian at Blok C023. Observations related to conservation area management.
- Enclave Area (Rubber Plant) at Blok C041. Observations related to the management of the occupied area within the HGU area of 21.64 Ha.
- Landfill at Blok C033. Observations related to domestic waste management.
- Land Application (LA) at Blok C018. Observations and interviews with workers related to the management and monitoring of Land Applications.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
RC-2	<p>Consultation of stakeholders for PT Bahari Gembira Ria was held by:</p> <ul style="list-style-type: none"> • Public Announcement on PT MAL Website on 27 March 2023 • Public consultation meeting with government of Muaro Jambi on 11 April 2023 • Public consultation meeting with local stakeholder conducted by visiting and interview on 11 April 2023 • Public consultation meeting with internal stakeholder on 11 April 2023 • Consultation with NGO (WWF, WALHI, Sawit Watch, AMAN) via email on 04 April 2023 <p>Numbers of input from stakeholders were clarified by PT Bahari Gembira Ria as part of this report</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (<i>ASA-2.2</i>) will be conducted eight (8) months to twelve (12) months after the date of certificate issued.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Ladang Panjang POM – PT Bahari Gembira Ria subsidiary of Sime Darby Plantation Berhad operation consisting of one (1) mill and one (1) oil palm estates.

During the assessment, there was one (1) Nonconformity were assigned against Major Compliance Indicators; one (1) Nonconformity were assigned against Minor 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.

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 actions that had been reviewed and accepted by Auditor in form of documentation evidence e.g. (document record/photographic). Those corrective actions taken that consist of two (2) Major non-conformities that had been closed out shall be verified during the next assessment.

MUTUAGUNG LESTARI found that Ladang Panjang POM – PT Bahari Gembira Ria subsidiary of Sime Darby Plantation Berhad complied with the requirements of Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.

Therefore, MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is 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 unit of certification has a list of information/documents that can be accessed by stakeholders such as government agencies, external audits and NGOs. As well as having a clear mechanism to regulate public access to these documents, including;</p> <ul style="list-style-type: none"> • Social and Environmental Documents: Environmental impact analysis documents, HCV identification reports, SIA identification reports, community empowerment program reports, procedures for handling social conflict, continuous improvement program documents, complaints and dissatisfaction reports. • Legality Documents: Evidence of ownership of land rights, Human Rights policy documents, RSPO and ISPO audit report documents. • Employment Documents: Work health and safety implementation plan documents, number of employees and list of basic wages as well as <i>BPJS</i> payment receipts, <i>NPWP</i> and tax data, and Occupational Health and Safety Advisory Committee Reports. 	

1.1.2

Based on document verification, all public documents (explained in 1.1.1) are accessible to relevant stakeholders by submitting an official letter of request for information. All information is provided in Bahasa.

The certification unit can show the provision of information to relevant stakeholders including the RKL-RPL Report, Hazardous Waste Management Report (*LB3*), Liquid Waste Management Report, Land Fire Report, Mandatory Manpower Report (*WLTK*), OHS Committee Report (*P2K3*) and Plantation Report Business Development (*LPUP*). Information has been provided in the appropriate language.

The results of document verification revealed that the implementation of OHS had been reported to the Manpower Office. However, the results of the document review revealed that there were several reports that exceeded the period as follows:

- LPF Quarter I 2022 P2K3 Report to the Manpower and Transmigration Office of Muaro Jambi Regency and the Jambi Provincial Office of Manpower and Transmigration which was reported on 02 May 2022.
- LPF 2022 Quarter II P2K3 Report to the Manpower and Transmigration Office of Muaro Jambi Regency and the Jambi Provincial Office of Manpower and Transmigration which was reported on September 8, 2022.
- LPF 3rd Quarter 2022 P2K3 Report to the Office of Manpower and Transmigration of Muaro Jambi Regency and the Office of Manpower and Transmigration of Jambi Province which was reported on 12 December 2022.
- P2K3 Quarter IV 2022 LPF Report to the Manpower and Transmigration Office of Muaro Jambi Regency and the Jambi Provincial Office of Manpower and Transmigration which was reported on March 27, 2023.

Related to this, companies are encouraged to submit mandatory reports to the government in accordance with a predetermined time period and its became opportunity for improvements.

1.1.3; 1.1.4

The unit of certification has procedures related to the provision of information as stated in the SOP for Request for Information number 008/BGR-PI/VIII/10 dated August 1, 2012, which was approved by SEM. The procedure regulates for the provision/request of public information addressed to the operational unit, the request is communicated to the operational manager to approve or disapprove it. The response to a request for public information is to complete the data request for information. Responses to requests for information must be provided within 14 days of receipt of the request for information.

The unit of certification shows documents for monitoring outgoing and incoming letter for the period 2022 – 2023. From the data, it is known that there were no requests for information addressed to the company and it's confirmed during public consultations. Based on interviews with representatives of the surrounding village community such as Sungai Gelam Village, it is known that the certification unit has socialized the communication and consultation mechanism as well as the PIC of the certification unit for such communication. The public has the convenience of communicating and obtaining the necessary information. Similarly, the results of consultations with the Environment Agency, the Manpower Agency and the Plantation Agency of Muaro Jambi Regency obtained information that obtaining information from the certification unit could be obtained easily. The unit of certification is cooperative and responds to requests for information from institutions. The company already maintain record of request information and response.

1.1.5

Unit of certification has a recording of an updated stakeholder list made for PT Bahari Gembira Ria and explains the name of the institution/organization, address, contact number and name of the serving personnel, such as contractors, labor unions, government institutions, villages around the company, etc. The person to be contacted clearly stated in the stakeholder list. From the results of interviews via telephone with stakeholders referring to the list, it can be connected, and the information found is valid.

Status: Comply

1.2

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

1.2.1

The Certification unit had a policy concerning the ethical codes in all operational activities and transactions. This policy is stated in the Code of Business Conduct (COBC) of Sime Darby Plantation which has been effective since April 2022 for Sime Darby Plantation and all of its subsidiaries. This policy explained that their ethical code is here as follows:

- Collaborating, respecting each other, equal opportunity, non-discrimination, and protecting human rights.
- Avoid conflicts of interest.
- Avoid bribery and corruption.
- Ensuring the confidentiality of the information and preventing the abuse of obtained information through the company's operational activities.

In the above policy document, matters related to the code of ethics have been explained for example, the principles of the code of ethics; conflict of interest; accurate report; bribery & illegal acts or unethical trade practices; entertainment and gifts; abuse of office; insider trading; confidentiality; limitation of application; media relations; and others.

This policy covers all operational activities of certification unit, including the prohibition of corruption, bribery and fraud in the use of funds and resources as well as compliance with reasonable business practices. Based on the results of interviews with workers and contractors in the sampling units such as in the mill and estate who stated that all of them had received socialization related to the company's code of ethics which includes prohibition of corruption, bribery and fraud in the use of funds and resources and adherence to reasonable business practices in all operational areas. The workers and contractors explained that it is not permissible to take actions that violate the company's code of ethics, for example committing crimes, gambling, domestic violence, bribery and so on.

Based on the explanation above, it can be concluded that the certification unit has committed to act ethically in all business operations and transactions in accordance with the code of ethics policy that has been approved by the company.

1.2.2

The certification unit has a several methods to monitor compliance and the implementation of overall ethical business policies and practices, such as internal audit and field monitoring. Every contractor has received a socialization regarding the policy of the code of ethics given at the time of signing the works agreement and the contractor has a Vendor Integrity Pledge, in which it is committed to comply with all applicable codes of ethics in the company.

In addition, there is also a whistleblowing mechanism listed in the Sime Darby Plantation Code of Business Conduct (COBC) which has been effective since April 2022 for Sime Darby Plantation and all of its subsidiaries. This mechanism can be used by workers to ensure that the identity of the complainant does not want to be known. This policy establishes the flow of complaints/reports of violations in which Sime Darby Group employees, without worrying, are willing to convey the possibility of fraudulent practices occurring within the certification unit. The policy explains the reporting mechanism, namely reporting directly to superiors.

Based on the results of interviews with workers in the sampling units such as plantation (harvesters, manurers, and sprayers) and mill (operators and security) who stated that all of them was aware of Whistle Blowing A system that has been implemented and can be accessed by all workers, including contract workers. In addition, there are statements from third parties (contractors) in collaboration with the certification unit, namely that they have been given socialization related to the code of ethics and the Whistle Blowing System before ratifying the cooperation agreement. This is done to ensure that before collaborating with the certification unit, his party does not commit a violation or can report a violation when a certification unit commits a violation during the collaboration.

During the past year there have been no reports related to violations committed by internal/external parties and this is evidenced by the results of a document review related to reporting documentation for the Whistle Blowing System via email or telephone indicated by the Internal Audit, Management or Complaint System.

	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		
<p>The company has list of regulations of 2023 that includes local regulations and national regulation updated annually. List of laws/regulations listed has covers several aspects such as land permit and legality, manpower, occupational health and safety, best management practices and environment. Some examples of regulations compliance that have been done such as:</p> <p>Land legality</p> <p>The company shown evidence over its compliance toward the applicable regulation related to the aspects of land legality such as:</p> <ul style="list-style-type: none"> HGU Certificate No. 4 of 2003, covering an area of 1,202.04 Ha is valid until May 6, 2038. Plantation Business Permit based on the Decree of the Head of the Integrated Service Agency of Muaro Jambi Regency No. 503/02 / BPTSP / 2014 dated 30 January 2014 covering an area of \pm 3,382.04 ha and the Palm Oil Processing Unit with a capacity of 45 tons FFB / hour. <p>Worker Welfare Aspect</p> <p>Certification unit in general has complied with manpower regulation, including:</p> <ul style="list-style-type: none"> Reporting of Employment Report for PT Bahari Gembira Ria in 2023 via online on 04 April 2023 and must be reporting back on 04 April 2024. Reporting of PT Bahari Gembira Ria PKWT usage in accordance with Decree No. 560.6/06/II/Nakertrans/2023 dated January 5, 2023, for a total of 23 PKWT workers with registration no. 01/PKWT/1/02/2023 at the Office of Manpower and Transmigration, Muaro Jambi Regency. Reporting of CSR (Corporate Social Responsibility) Realization Report in 2022 on 09 March 2023 to the Investment and One-Stop Services Office of Muaro Jambi Regency. The implementation of the minimum wage in 2023 is in accordance with the Muaro Jambi Regency Minimum Wage Decree that has been the established by the Governor of Jambi on 07 December 2022. Payment of overtime wages to workers in accordance with Government Regulation No. 35 of 2021. Implementation of the wage, structure and scale of wages for all levels of workers in accordance with Government Regulation No. 36 of 2021. <p>Environmental Aspects</p> <p>Based on document verification and interviews with management, it was discovered that the company was directed to carry out the Addendum Process for AMDAL and RKL-RPL Type B based on a Letter from DLH Muaro Jambi Regency number 660.4/127/II.I/DLH regarding Changes in Directions for Screening Environmental Documents PT Bahari Gembira Ria , on August 31, 2022, the contents of the letter:</p> <ul style="list-style-type: none"> For directives to amend the environmental approval if the business and/or activity that has obtained an Environmental Feasibility Decree or an Approval for a Statement of Commitment to Manage the Environment, changes are planned, as well as the provisions in Article 91 paragraph (l) letter c amends the Environmental Feasibility Decree Living with the obligation to prepare and evaluate the Addendum of Andal and RKL-RPL. Based on this explanation, changes to the PT Bahari Gembira Ria oil palm plantation Environmental Permit from \pm 20,551 Ha of land (for nucleus and plasma) to \pm 2,998.23 Ha (only for the core scope of which is included in the environmental document review) are required to prepare an Addendum on Andal and RKL-RPL type B to the Regent of Muaro Jambi through DLH of Muaro Jambi Regency. <p>Regarding these directives, the following are several follow-up steps from the company:</p> <ul style="list-style-type: none"> The company wrote a letter to PT Anugrah Agung Nusantara (as a consultant for preparing the AMDAL) with letter number O/Reff: 096/RTC-RSS/AWD-BGR/XII/2022 on December 19, 2022 regarding the Work Letter Award for Management of 		

Changes in Environmental Permits and Preparation Addendum to PT Bahari Gembira Ria AMDAL Documents.

- Then issued SPK No.001/Amdal/BGR/I/2023 between PT BGR and PT Anugrah Agung Persada on January 5 2023, in the SPK stated that all work must be completed within 6 months from January 5 2023.
- Work Handover Minutes on Thursday, January 5, 2023, a work handover was carried out between PT BGR and PT AAP.

Companies are encouraged to be able to ensure that the AMDAL addendum preparation process can run positively and can be completed according to a predetermined timeline and can immediately submit an AMDAL addendum request to DLH Muaro Jambi Regency when the AMDAL addendum document is completed by the consultant.

Therefore this indicator became OFI for Environmental aspect.

2.1.2

The certificate holder has a documented system to ensure legal compliance listed in the Procedure No: 010/PH-BGR/VIII/10, 10 August 2010. The procedures include explaining that regulations can be obtained and updated by contacting government and non-government agencies to ensure that the latest regulations apply, including international, national, and local and actively visit related websites. company have shown list of updated regulation related to the field of worker welfare aspect are:

- Government regulations No. 35 of 2021 concerning Specific Time Work Agreements, outsourcing, working hours, rest periods, and layoffs.
- Government regulations No 36 of 2021 concerning Wages.

A list of regulatory identifications ranging from Laws, Government Regulations, Presidential Decrees, Ministerial Regulations, Ministerial Decrees, Regional Regulations, and the ratification of the ILO. Internal audits have been conducted continuously and are documented and reviewed in the management review activities conducted in February 2023. To ensure compliance with the certification unit and third-party laws in the certification unit, routine monitoring is carried out once a year by means of compliance audit / internal audit. The last internal audit for RSPO and SCCS was conducted on 09 – 14 January 2023.

In addition to going through a compliance audit / internal audit, the company conducts monitoring and evaluation of third parties (contractors) through contractor evaluation activities which are conducted at least once a year. The types of evaluations carried out include contract compliance, contractor quality and performance, accuracy of work completion, and etc, its described-on indicator 2.2.2.

2.1.3

Boundaries pole monitoring procedure available in the 057BGR-PPB/C13, revision 00 dated July 1, 2020, about BPN Poles Monitoring. In the procedure described boundaries monitoring carried out annually or at least once year. Based on documents verifications it was known there are 10 boundaries poles in PT BGR. Last monitoring carried out in March 2023 and all boundaries' poles are available.

Based on observation to in poles sample (Poles No 2, 3, 4 and 5) it was known that Boundaries poles were satisfactory maintained and easy to identify. Furthermore, coordinate marked by Auditor through application GPS-Map were match with coordinate settled by Land Agency.

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

In monitoring the use of third parties (contractors, FFB suppliers, transporters and others) for plantation and mill activities, the certification unit has well documented the list of third parties, the number of workers they have, contact persons, work agreements, and ensuring other matters related to compliance with laws and regulations in Indonesia. At present the certification

unit has third parties (Contractor, Transporters for CPO/PK, Health Laboratory, Hazardous Waste Transport, Testing Company and any others), local Suppliers (material, food, and others) and FFB Suppliers (Cooperative Production Pentagon) that has been cooperate with certification unit. These contractors collaborate in the activities of transportation for FFB, CPO and PK.

In managing the contractor, the certification unit has a copy of the cooperation agreement in each unit. At the time the audit was carried out, certification unit have third parties list document shown was in accordance with the actual, such as the contact number of each stakeholder contacted by the auditor as stated in the list. The explanation above can be concluded that the certification unit has managed and documented the list of contractors along with supporting documents.

2.2.2

Non-Conformity No. 2023 with Minor Grade that has been raised to Major Grade.

Based on the results of a review of documents related to contractors and compliance with relevant regulations, the following facts were found:

PT Technindo Contromantra (Overhaul Boiler Contractor)

- Work Agreement Letter No. 037/Boiler/BGR-LPF/XI/2022 dated November 16, 2022, which already contains regulations to comply with applicable laws and regulations, such as worker age, wages, OHS, BPJS and so on. There has been a signing of the Vendor Integrity Pledge for COBC (Code of Business Conduct).
- The list of employees consists of 7 people and all of them are over 18 years of age. However, there is no explanation on the status of these workers whether they are PKWT or PKWTT workers and it cannot be proven that all workers have a working relationship with the contractor.
- Has Monitoring Compliance with Legal Requirements that are Relevant to compliance that is monitored there are as many as 6 compliances namely Legality Documents, OHS Requirements, Employment BPJS, Health BPJS, Employee Wages, and Employment Relations. Of all these things, the contractor only fulfils a few compliances, such as:
 - ❖ Legality Compliance has been fulfilled and supporting documents can be shown.
 - ❖ BPJS Health compliance has been fulfilled (but only for 1 worker, while the other 6 workers don't have it yet).
 - ❖ Employment BPJS compliance has been fulfilled (only for 6 workers, while 1 other worker does not have it yet).
 - ❖ Compliance with PPE has been fulfilled (evidenced by providing PPE to workers and showing the minutes of the handover).
 - ❖ Compliance with Labor Relations is not yet available.
 - ❖ Compliance Wages of workers are not yet available.
- Have an evaluation of the fulfillment of relevant legal requirements referring to 3 laws and regulations, namely:
 - ❖ Law No. 01 of 1970 concerning Occupational Health and Safety, which was declared to have been fulfilled by the contractor by the company (but for first aid compliance it was not fulfilled).
 - ❖ Law No. 24 of 2011 concerning the Social Security Administrative Body, which has been declared fulfilled by the contractor by the company (however BPJS Health and Employment has not been fully registered).
 - ❖ Law No. 13 of 2003 concerning Manpower, which has been declared fulfilled by the contractor by the company (however focused on the prohibition of employing children, while wages and work agreements have not been shown to be fulfilled).

PT Putra Empat Zheed (Empty Bunch, CPO & PK Transporter)

- Work Agreement Letter No. 013/BGR-SPK/LPE/I/2023 dated 02 January 2023 which already contains the requirements to comply with applicable laws and regulations such as age of worker, wages, OHS, BPJS and so on. There has been a signing of the Vendor Integrity Pledge for COBC (Code of Business Conduct).
- There are 10 workers on the list (4 for CPO/PK drivers and 6 for empty-length drivers) and all of them are over 18 years of age. However, there is no explanation on the status of these workers whether they are PKWT or PKWTT workers and it cannot be proven that all workers have a working relationship with the contractor.
- Have Monitoring of Compliance with Legal Requirements that are Relevant with 6 compliances being monitored, namely Legality Documents, OHS Requirements, Employment BPJS, Health BPJS, Employee Wages, and Employment Relations. Of all these things, the contractor only fulfils a few compliances, such as:
 - ❖ Legality Compliance has been fulfilled and supporting documents can be shown.
 - ❖ BPJS Health compliance has been fulfilled (but only for 2 workers, while the other 8 workers don't have it yet).

- ❖ Employment BPJS compliance has been fulfilled (only for 6 workers, while 4 other workers do not have it yet).
- ❖ Compliance with PPE has been fulfilled (evidenced by providing PPE to workers and showing the minutes of the handover).
- ❖ Compliance with Labor Relations is not yet available.
- ❖ Compliance Wages of workers are not yet available.
- ❖ SIM compliance has been fulfilled by showing SIM ownership for all drivers (10 drivers).
- Have an evaluation of the fulfillment of relevant legal requirements referring to 4 laws and regulations, namely:
 - ❖ Law No. 01 of 1970 concerning Occupational Health and Safety, which was declared to have been fulfilled by the contractor by the company (but for first aid compliance it was not fulfilled).
 - ❖ Law No. 24 of 2011 concerning the Social Security Administrative Body, which has been declared fulfilled by the contractor by the company (however BPJS Health and Employment has not been fully registered).
 - ❖ Law No. 13 of 2003 concerning Manpower, which has been declared fulfilled by the contractor by the company (however focused on the prohibition of employing children, while wages and work agreements have not been shown to be fulfilled).
 - ❖ Law No. 22 of 2009 concerning Traffic and Highways, which has been declared fulfilled because all drivers already have a SIM (Driving License) in accordance with these regulations.

CV Arta Citra Lestari (Harvesting Activity & FFB Transporter)

- Work Agreement Letter No. 005/BGR-LPE/SPK/II/2023 dated January 7, 2023, which already contains the requirements to comply with applicable laws and regulations, such as worker age, wages, OHS, BPJS and so on. There has been a signing of the Vendor Integrity Pledge for COBC (Code of Business Conduct).
- Based on the registration of workers at the Manpower and Transmigration Office of Muaro Jambi Regency, the contractor has registered 11 workers (4 workers loading FFB and 7 workers harvesting FFB) with PKWT status (SPK with contractors and all have been shown). None of these workers are under 18 years of age.
- Proof of payment of workers' wages from the contractor in the March 2023 period for a total of 11 workers and all of them received wages above the minimum wage set by the government.
- Have Monitoring of Compliance with Legal Requirements that are Relevant with 6 compliances being monitored, namely Legality Documents, K3 Requirements, Employment BPJS, Health BPJS, Employee Wages, and Employment Relations. Of all these things, the contractor only fulfils a few compliances, such as:
 - ❖ Legality Compliance has been fulfilled and supporting documents can be shown.
 - ❖ BPJS Kesehatan compliance has been fulfilled, but from the list of BPJS Kesehatan ownership there is not a single worker who has it.
 - ❖ Employment BPJS compliance has been fulfilled, but only for 5 workers while the other 6 workers do not yet have it.
 - ❖ Compliance with PPE has been fulfilled (evidenced by providing PPE to workers and showing the minutes of the handover).
 - ❖ Compliance with Labor Relations is not yet available.
 - ❖ Compliance Wages of workers are not yet available.
- Have an evaluation of the fulfillment of relevant legal requirements referring to 3 laws and regulations, namely:
 - ❖ Law No. 01 of 1970 concerning Occupational Health and Safety, which was declared to have been fulfilled by the contractor by the company (but for first aid compliance it was not fulfilled).
 - ❖ Law No. 24 of 2011 concerning the Social Security Administrative Body, which has been declared fulfilled by the contractor by the company (however BPJS Health and Employment has not been fully registered).
 - ❖ Law No. 13 of 2003 concerning Manpower, which has been declared fulfilled by the contractor by the company (however focused on the prohibition of employing children, while wages and work agreements have not been shown to be fulfilled).

From the evidence found above, it can be concluded that the company does not yet have clear procedures/mechanisms for monitoring and evaluating compliance with relevant regulations, such as:

- The time frame for conducting monitoring and evaluation, because the monitoring and evaluation shown was only carried out during the audit activity (the evaluation was carried out on April 12, 2023).
- The monitoring and evaluation results shown are out of sync with the evidentiary documents shown starting from the

fulfillment of BPJS Health and BPJS Employment (stated to have been fulfilled but from the evidence shown not all were fulfilled).

- There is still evidence of compliance shown but not monitored and evaluated such as compliance related to work agreements between workers and contractors (this has been a non-compliance in the previous assessment), wages and age requirements for workers.
- The results of the evaluation state that all third parties that have worked with the company so far have not complied with the fulfillment of relevant regulations that have been reviewed by the company and the company has not shown a target for these legal obligations to be met by the cooperating third parties.

The company has not been able to show evidence that all third parties working with the company have fulfilled relevant legal obligations and can be proven by third parties supported by clear procedures/mechanisms. Based on explanation above raised NC No 2023.01 with major category

2.2.3

In each work agreement between the certification unit and the contractor, there are clauses related to fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the contractor. Some of these obligations are related to disallowing child, forced and trafficked labor to be employed by the third party (Contractor, Transporters for CPO/PK, Health Laboratory, Hazardous Waste Transport, Testing Company and any others) and where young workers are employed, the contracts include a clause for their protection. To ensure compliance with these clauses, the certification unit always requests the requirements for the completeness before the contractor does / starts work.

The results of the document review of the list of contractor workers revealed that there were no workers under the age of 18 and the work provided was in accordance with the agreement when the initial worker worked. This is in line with the results of interviews with contractors stating that no child laborers have worked up until now, there are no forced laborers / workers resulting from trafficking because all workers have understood the work agreement at the start of work and payment for the work is always equal.

The certification unit has proven that all contracts have clauses disallowing child, forced and trafficked labor to be employed by the third party, and where young workers are employed, the contracts include a clause for their protection.

2.2.2	Status: NCR No. 2023.01 with Major Category
-------	---

2.3

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

2.3.1

Based on document verification, it is known that the company received FFB apart from the nucleus plantations, but also directly received FFB from plasma plantations. The FFB suppliers to Ladang Panjang POM are as follows:

- Ladang Panjang Estate Division 3 (Certified RSPO)
- Ladang Panjang Estate Division 1 & 2 (Uncertified RSPO)
- Karya Mandiri Cooperative
- Karya Maju Cooperative
- Marga Jaya Cooperative
- Manggar Jaya Cooperative
- Mitra Inti Cooperative

The company can show the geolocation information of FFB suppliers to Ladang Panjang POM, namely:

- Ladang Panjang Estate Division 3 (Certified RSPO) (S:01° 47' 39" dan E: 103° 47' 58")
- Ladang Panjang Estate Division 1 & 2 (Uncertified RSPO) (S:01° 43' 52" dan E: 103° 51' 54")
- Karya Mandiri Cooperative (S:01° 47' 34" dan E: 103° 49' 29")
- Karya Maju Cooperative (S:01° 43' 34" dan E: 103° 55' 00")

- Marga Jaya Cooperative (S:01° 47' 02" dan E: 103° 50' 06")
- Manggar Jaya Cooperative (S:01° 43' 02" dan E: 103° 52' 00")
- Mitra Inti Cooperative (S:01° 47' 03" dan E: 103° 49' 29")

In addition, plasma cooperatives also have land legality in the form of SHM.

2.3.2

Based on document verification, it is known that the company does not receive FFB indirectly. All FFB received are FFB received directly from the nucleus and plasma plantations.

Status: Comply

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

3.1

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

3.1.1

The company shows a year plan that informs Production Projections (FFB, CPO and PK), price estimates, and financial indicators. For example, the period 2022 – 2026 is as follows:

Description	Unit	2022	2023	2024	2025	2026
FFB Productions	Ton	39,543.00	42,288.00	40,730.00	39,382.00	38,118.00
OER	%	21.80	21.60	21.65	21.70	21.75
KER	%	4.75	4.75	4.75	4.75	4.75
CPO Productions	Ton	21,834.00	20,287.00	19,249.00	19,033.00	18,822.00
Kernel Productions	Ton	4,757.00	4,461.00	4,223.00	4,166.00	4,111.00

Based on semi-detailed soil survey reports conducted by the it was concluded that there were no peat areas in the certifications area. Thus, there are no records of planting and maintaining plants and monitoring peat areas.

3.1.2

The company shows the Inter-Office Mail from OC RSS number 02/OC-RSS/III/2022 dated March 10, 2022, which informs the plan for the replanting of PT BGR Division III covering an area of 313.47 Ha in 2026. Based on the results of interviews with management, it was stated that the replanting plan would be reviewed by looking at the level of production and other factors.

3.1.3

The management review conducted in several ways, consist of an annual Management Review for the mill and a review budget meeting in the estate. The company can show the evidence if the management review that been carried on 01 – 04 March 2023 with the issue that discussed the result of internal audit, a grievance from customer or stakeholder, process performance and product, follow up from previous management meeting and etc.

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 company has taken actions for continuous improvement in environmental aspects, for example:

- Waste management and monitoring through WWTP Management, effluent quality testing and reporting to the Muaro Jambi

Regency Environmental Service.

- Air quality management and monitoring through road maintenance, air quality testing and reporting to the Muaro Jambi Regency Environmental Service.
- Management and monitoring of groundwater through testing ground water quality and reporting it to the Environment of Muaro Jambi Regency.
- Hazardous waste management through Hazardous and Toxic Waste Storage and Hazardous and Toxic Waste management and monitoring.
- Greenhouse Gas (GHG) Management. Implement a zero-burning policy, utilization of EFB, shells and fiber as renewable energy, regular engine maintenance, and regular emission quality tests.

Worker Welfare

- Unit certification has set minimum wage regulations for all workers based on the stipulation of minimum wages by the Governor of Jambi for 2023.
- Unit certification facilitates workers with adequate housing, electricity facilities, and availability of clean water in every publicly available housing.
- Unit certification is also committed to avoiding acts of discrimination, sexual harassment, child labor or acts of human rights violations in the work environment.

Best Practice

- The company no longer uses pesticides with the active ingredient paraquat.
- The company has implemented biological pest control in this case by using host plants and owls to reduce the use of pesticides, especially insecticides and rodenticides.
- Management and monitoring of fires in company border areas that benefit the community.

3.2.2

Based on document verification, for The RSPO metric template known annual data 12-month period use (for schedule reporting annual data social and environmental, included monitoring data of water consumption, management dan monitoring HCV.

The company shows the RSPO Metrics P&C Template a week prior the audit, however there are several reviews regarding data in the Matrix that need to be synchronized and it's finalized on the last day of audit. In accordance with the guidelines in the RSPO P&C Metric Template, it is stated that the RSPO P&C Metric Template will be completed at the unit level of certification and must be submitted to the certification body prior to RSPO certification, recertification, or annual supervisory audit.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The company has had procedures related agronomy and mill. The procedures covered all activities in mill and estate. PT BGR has plantation operational procedures from land clearing to FFB harvesting listed in the Agronomy Manual with number 110/EST-ARM/13 dated September 1, 2013. In addition, PT. BGR also has mill operational procedures from the process of receiving FFB to palm oil and kernel storing listed in the palm oil mill technical guidelines dated 30 April 2007. The procedure was signed by the Head of Plantation Upstream Indonesia Minamas and was distributed on September 16, 2013, to all Division Heads/Department Heads and all heads of plantation and mill units. During an audit, a copy of the SOP is available at the audit site and in the Indonesian language (Bahasa). The procedures have covered all Estate operations starting from land clearing, maintenance, pest handling, harvesting, transportation of FFB, replanting, delivery to POM. Meanwhile the procedures of Mill covering the aspects of FFB receiving, grading, processing, refinery, dispatch, supply chain, and quality/laboratory.

3.3.2; 3.3.3

The company also has a system to ensure consistency regarding the implementation of the procedures listed in the Sustainable Plantation Management Guideline with document number 724/TQEM-SPMS/09 dated August 27, 2010. The procedures

explained regarding the implementation of internal audit, external audit, management evaluation, evaluation level, evaluation responses and revised procedures. Officers who carry out audit and evaluation have competencies as expected by the CH.

The mechanism to monitor implementation of the procedures consist of operational and RSPO internal audit, managerial supervisory, documented report, and management review. Daily internal supervision was carried out by the level of supervision starting from the Foreman, Division Assistant the Estate Manager. Monthly and semesterly assessments carried out by the Internal Audit Department. Operational internal audit evaluates the implementation of operational and administration of estates and mill as well as monitoring the performance of contractor related to compliance to company procedure. Whereas RSPO internal audit evaluate the implementation of sustainability procedures in estates and mill.

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

Meanwhile, consistency of procedures implementation, the company has a management and evaluation regularly internally involve all level key management.

Status: Comply

3.4

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

3.4.1

The company has conducted an independent and participatory environmental and social impact assessment by involving the stakeholders listed in several documents, namely:

Environmental Aspect

The company already has environmental documents in the form of Environmental Impact Analysis Documents (ANDAL) and RKL/RPL (Management Plan/Environmental Monitoring Plan) Plantation and Palm Oil Processing Factory PT Bahari Gembira Ria which covers an area of 4,000 hectares of nucleus plantations and 6,000 hectares of plasma plantations and Factory Capacity 45 Ton FFB/Hour. The document has been approved by the Governor of Jambi No. 304/KEP.GUB/BAPEDALDA/2007 on August 2, 2007.

The company also has conducted an HCV assessment in the PT BGR Management unit which was carried out in an area of 1,202.04 ha and 3 villages namely Petaling Jaya Village, Sumber Agung Village and Sungai Gelam Village, Kumpeh Ulu District, Kab. Muaro Jambi with activity dates 13 Nov 2009 – 19 Nov 2009.

Social Aspect

The company has carried out an SIA study in the Social Impact Assessment Report for Palm Oil Management which was carried out in January 2010 which was carried out together with a third party (Polito). The villages included as villages around the company are Sungai Gelam Village, Sumber Agung Village, Petaling Jaya Village and Mingkung Village. Public consultation related to the SIA study was conducted on January 8, 2010, involving the community and local government.

Based on document verification the social management and monitoring program evaluation and review year 2022 environmental and social impact monitoring at the PT BGR, that the social and economic conditions of the community have a positive impact, especially in increasing employment, increasing community income and increasing business opportunities carried out in the surrounding community.

3.4.2

Base on environmental document known management and monitoring plan semester 2 2022 has prevent negative impacts such as Air quality and noise, soil fertility and erosion, water quality, waste, social aspect, public health, labor recruitment, aquatic

biota, flora & fauna, sedimentation, replanting, transportation, land fire, Increased income of the community and employees and smallholder scheme and others.

As a follow-up to the results of the identification of social impacts that have been carried out, the company submitted a social evaluation and monitoring document for PT BGR which was compiled on October 10, 2022, the monitoring of social impacts carried out are:

- Community income regarding the existence of plantations.
- Public opinion implemented by the company program.
- Livelihood before and after plantation.
- Changes in people's income before and after there is a company.
- Community views on the continuation of plantations and KKPA.
- Increasing employment and piecework from the community.
- Significant impact of replanting activities.
- The public's view of the existence of the company and cooperative full managed in triggering other economic improvements, such as the trade and community business sectors.

The social management plan describes the sources and types of impacts to be monitored and managed, PIC/responsible person, timeframe and location, benchmarks/parameters, management efforts and monitoring methods.

Several representative issues have been covered in the Management and Monitoring implementation report period 2022, such as the absorption of local workers, termination of employment and replanting.

3.4.3

The Company has implemented environmental and social management and monitoring plans, namely:

Environmental Aspect

The company has implemented an environmental management and monitoring plan for the 1st and 2nd semesters of 2021. The environmental management and monitoring plan is in accordance with the environmental documents it has. The results of the verification of the implementation of the environmental management and monitoring plan for semesters 1 and 2 of 2021 are in accordance with the directions of the environmental documents owned. In general, the results of environmental management and monitoring are in accordance with the provisions. The company has also conducted evaluations such as trend evaluation, critical level evaluation, and compliance evaluation. There are several environmental parameter tests such as river water testing that exceeds the quality standard of PP No. 22 of 2021 Class III, namely for COD and PH parameters in the Upper and Lower Terentang Rivers. This is caused by domestic activities in upstream plantations and is influenced by peatlands located in Divisions 1 and 2 which are outside the scope of certification. The company has carried out an evaluation by maintaining the river border area by enhance with plant the forest trees on the left and right of the river. Based on the results of interviews with the surrounding community, information was also obtained that there was no environmental pollution by the company. In addition, the results of the interview with the Environmental Office of Muaro Jambi Regency also explained that the company had carried out environmental management and monitoring and reported the results of the implementation of environmental management and monitoring to the Environment Agency.

Social Aspect

The company has implemented an environmental management and monitoring plan for the 2nd semester of 2022. Based on document verification, it is known that the implementation of the environmental management and monitoring plan is in accordance with the directions of the environmental documents it has.

The company has evidence of the results of interviews with the public, test results, and supporting evidence that have been included in the environmental document implementation documents for semesters 1 and 2 of 2022 for PT BGR.

The last evaluation for environmental monitoring/management plans have been developed in July 2021 and as the feedback of review, the company has included land fire monitoring, land applications, and pollution impact on semester 2 the year 2021 monitoring report.

The social impact management and monitoring plan has been developed with the participation of widely affected stakeholders all issues that have been monitored and managed in a comprehensive and integrated manner. The results of the review of the Social Impact Management and Monitoring Plan Review Report document, there have been results of minutes with affected parties regarding issues / negative perceptions related to the things mentioned above. The review has involved workers from PT BGR and surrounding villages. Based on the results of the review, there are improvements to the management and monitoring plan prepared for the 2022 period such as replanting activity and land fire. The review of the Social Impact Management and Monitoring Plan year 2022 has involved internal and external stakeholders with the questionnaire method.

Based on the results of interviews with internal and external stakeholders, information was obtained that there were no negative issues for both environmental and social impacts.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1

The certification unit has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Collective Labor Agreement period 2022-2023 written in Bahasa. In general, these procedures describe:

- Recruitment of workers is based on needs and adjusted to the ability of the company.
- The age of the prospective worker is a minimum of 18 years at the time of recruitment of workers.
- Recruitment of workers is based on the ability, expertise and assessment of prospective workers.
- The company is authorized to carry out the placement, transfer and promotion of workers in accordance with applicable regulations.
- Termination of employment can occur when a worker retires, dies, resigns, and terminates an employment agreement due to a serious violation and others.

In addition to being publicly listed in Collective Labor Agreement, the certification unit has other procedures in the form of Policies, SOP, Internal Memorandums and others related to recruitment, transfer, promotion, retirement, termination of employment and others. These procedures have been documented to all workers and their representatives. One of the socializations given to workers was related to Collective Labor Agreement and Company Procedure/Policy in 08 December 2022 which was attended by all workers on muster morning. For example, some procedures that are owned by the company include:

- Policy No. 431/HRM-RCT/07 and Procedure No. 431/HRM-RCT/07 related Employee recruitment
- Procedure/Memorandum No. 290/HRM-i3/VI/2015 and No.287-HRM-i1-V-11 related Career Path and Performance Assessment for Permanent Employee (SKU/PKWT).

The certification unit did not have workers with contract status for daily/casual worker (BHL), but they still have contract worker (PKWT), the current employee status is permanent workers with Grade (from H to A8) and Staff. All the rights for each employment status have been distinguished. Based on the results of interviews with workers in the estate and mill units and representatives of the labor union, it is known that the workers have understood the recruitment, selection, promotion and other employment procedures contained in the Collective Labor Agreement and in other procedures.

From this explanation it can be concluded that the certification unit has procedures for recruitment, selection, employment, promotion, retirement and termination of employment must be documented and available to workers and their representatives in accordance with applicable laws and regulations.

3.5.2

The certification unit always documented all labor procedures that have been carried out properly such as recruitment, promotion, performance assessment, pension and others. The following are some sample labor procedures that have been implemented and are well documented by certification unit, including:

- Employment Acceptance Document for workers with the initials SHR (harvester) starting with the Employment Application Letter to apply for a job as a Harvester worker at PT Bahari Gembira Ria. After the letter is received and the worker is declared accepted by the company, it begins with the signing of the Work Agreement Letter No. 14/BGR-LPE/Lokal/XII/2022 dated 01 December 2022 for Harvesting workers.
- Employment Acceptance Document for workers with the initials MDR (harvester) starting with the Employment Application Letter to apply for a job as a Compound worker at PT Bahari Gembira Ria. After the letter is received and the worker is declared accepted by the company, it begins with the signing of the Work Agreement Letter No. 13/BGR-LPE/Lokal/XII/2022 dated 01 December 2022 for Harvesting workers.
- The certification unit has a worker promotion from a contract worker to a permanent worker. For example, a Harvester (YLD) who has received a performance appraisal in 2022 with a "Good" result so that he is declared eligible to get a promotion from contract worker to a permanent worker (Grade H) in accordance with Decree No. SK-Pengangkatan/SKU-LPE/2023/I001 dated 03 April 2023 which Valid from 03 April 2023.

The results of interviews with workers (harvesting, spraying and mill operators) in plantation and mill, explain that the certification unit has carried out labor procedures starting from recruitment, selection, acceptance, promotion and retirement procedures in accordance with existing regulations, as well as all. The application is assessed in accordance with the abilities and competencies of the employees. For example, workers who initially entered were selected before being accepted, workers who received position promotion / grade promotion had received an assessment from their superiors and workers who retired received all their rights as retirees. During 2022 until now there were no recruitment issues that occurred at certification unit, this was in accordance with the results of interview with the labor union, and Manpower & Transmigration Agency of Muaro Jambi Regency which stated that the application of existing labor procedures certification unit is in accordance with the regulations and since 2022 (January-December) until now there have been no recruitment issues.

Based on the description above, it can be concluded that the certification unit already has labor procedures implemented and records are maintained for each worker.

Status: Comply

3.6

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

3.6.1

Unit certification unit has had a policy of occupational safety and health were written in Bahasa. The policy has been legalized. This policy is designed to control hazards in every activity that is in the working environment to prevent accidents and occupational diseases. Management have work program of occupational health safety every year. Realization of the program of work will be monitored through regular meetings Guiding Committee of Occupational Safety & Health (P2K3) every month. This work program applies generally to all workers in the workplace. If the plans have been made yet on target, then will be evaluated in the regular meetings to assess effectiveness.

The company has carried out risk identification for all of its business units in mill and estate, for example the Environmental Impact Analysis and OHS Risk Assessment which were prepared by OHS Experts and approved by EM on April 18, 2022 with work activities/processes consisting of 39 activities such as land clearing, nursery, planting, harvesting and transporting, fertilizing, spraying, storage, filling stations, hazardous waste warehouses, polyclinics, electrical installations, generators, lawn mowers, infrastructure (heavy equipment, road maintenance), infrastructure (civil), Estate offices, workshops, mechanized harvesting, housing, fire monitoring patrols, environmental monitoring.

Based on field observation, hazard identification risk assessment and control (HIRAC) documents has been implemented adequately and appropriate in Estate and Mill. For examples: operator uses ear muff, harvester uses helmet, etc.

3.6.2

Based on document review as well as field observations in warehouses and harvesting activities, known that the company has completed OHS instructions such as banners for gathering points, evacuation routes, and OHS warnings in order to controlling risks and potential hazards for all employees, for example, warning about PPE mandatory areas at each station according to the identification of risks and potential hazards.

In additions, the company carries out activities to monitor the effectiveness of the OSH plan such as:

- Regular monthly OHS meetings for each unit in the context of the effectiveness of the OSH plan that has been prepared in the beginning of the year.
- MCU.
- Hold a First Aid Kit Simulation for each management unit.

Status: Comply

3.7

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

3.7.1

Certification unit has training identification and program for workers for period of 2023 for operational training, OHS training, and policy socialization. The aspect in the training program is such as environment, labor best management practice aspect, and others. Some of training program, namely:

- Training for manuring, harvesting and spraying activity.
- Socialization of company's policy such as human right, no child worker, and sustainability policy.
- First aid training.
- Training for Environment and hazardous waste handling.
- Simulation of emergency responses and firefighting management

In addition, the certification unit has an identification and training program for relevant stakeholders (contractors, local communities and smallholders). These programs include the following:

- Socialization of company policies such as code of conduct, human rights, no child worker and others.
- Training for best practices to smallholders.
- Training for OHS and PPE.

As explained above, apart from having a training program for each worker according to the type of work, the company also regularly conducts refreshment training every year. This is proven by evidence of routine socialization which is considered to be still needed by workers. If the results of the performance evaluation conducted show that all workers have sufficiently understood their duties/responsibilities, the company will still carry out refreshments related to this matter so that the worker continues to have a sufficiently understanding every year. For the need for stakeholder understanding related to policies, procedures and new information related to the company (including matters related to the RSPO Principles & Criteria) it is also carried out routinely every year, this is done to maintain the understanding of these stakeholders.

Based on this explanation, it can be concluded that the certification unit has a documented training program for all staff, workers, smallholders and outgrowers taking into account specific needs related to gender and covering aspects of the RSPO Principles & Criteria in a form that they can understand and includes assessment of training.

3.7.2

The certification unit has properly documented every training activity and socialization that has been carried out to workers and related stakeholders. The following is an example of training/socialization documentation that has been carried out during 2022/2023, namely:

- Karhutla Prevention and Management Training (Forest and Land Fires) for Fire Care Farmers Groups (KTPA) in Sumber Agung, Gambut Jaya, Parit, Ladang Panjang and Trimulya Jaya Village on 22 December 2022.
- Dissemination of Company Policies, Communication and Consultation Mechanisms to surrounding village communities, scheme smallholder and contractors on 13, 19 and 23 January 2023.
- Dissemination of Company Policies, Communication and Consultation Mechanisms to the surrounding village community, and contractors on October 28, 2022.
- Dissemination of Company Policies and Complaint/Complaint Mechanisms to all employees on December 8, 2022.

Based on field observations and interviews with workers (harvesters, sprayers and mill operators), it is known that workers have understood their work in accordance with the procedures set by the company and their understanding of the duties and responsibilities for each job has been carried out quite well, because the certification unit has routinely conducted training every year according to the type of each work. Meanwhile, the results of interviews with representatives of contractors, contractor workers and the surrounding community revealed that they had received routine socialization related to company policies, code of conduct, PPE, communication procedures and complaints were routinely provided by the certification unit which causes stakeholders to understand the procedures and work methods that already exist in the company's operational area.

Based on the foregoing, it can be concluded that the certification unit has an identification and training program for all workers including stakeholders (contractors, suppliers, local communities and smallholders) related to the RSPO Principles & Criteria and all of them have been well documented.

3.7.3

Training Program 2023 is available including RSPO Supply Chain. Actual training for RSPO Supply Chain in 2023 conducted on 06 March 2023. The training subjected to SOP of Supply Chain and Traceability of Palm products. Training attended by relevant personnel including mill assistant, laboratory, Senior Assistant, weighbridge clerk, production clerk and etc.

Based on interview to the workers involved in SCCS operations, such as, weighbridge operator (for dividing amount of certified and uncertified sourced), and Administration Head (for recording and monitoring the MB data), known that the workers understood the SCCS mechanism, and the MB record has conducted and monitored well.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 & 3.8.2

Ladang Panjang Factory implemented SCCS Module Mass Balance due to processed FFB from certified and uncertified sources.

3.8.3

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

	Last Year Projected Certified Volume (MT)	Actual production in April 2022 – March 2023	Estimation for the next 12 months
FFB Processed	29,500	23,223.83	25,000
CPO Production	6,350	4,704.69	5,375
PK Production	1,450	992.83	1,125

3.8.4

The Mill has registered as RSPO member under Sime Darby Plantation Berhad (No. 1-0008-04-000-00) 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: Sime Darby Plantation - Ladang Panjang POM, PT BGR

- License ID: CB135465
- Core Product: Palm Oil
- Member ID: RSPO_PO1000000315
- Type of Business: Oil Mill
- Start Date : 09 July 2022
- End Date : 08 July 2023

During license period it was known there is no product sold as RSPO certified. All certified products sold as non-certified/conventional as described in indicator 3.8.8 and 3.8.16. The company has been removed or allocated to credit product certified products sold as conventional.

3.8.5

Ladang Panjang Factory has had procedure for SCCS with RSPO Supply Chain Certification Manual (SCCS-Std/RSPO/PSQM/02, Revision 3, 01 December 2020) The procedure rules all element related SCC aspects covering the Inform flow chart of mill business process starting from FFB acceptance to CPO dispatch, internal audit, document retention period, certified CPO selling, logo and trademark use, business communication, product complaint mechanism, and management review etc. Based on document verification it was known the procedure has been referring to latest standard of SCCS. Furthermore, the procedure has covered all aspects in SCCS MB model. the results of interviews with Head of Administration and weighbridge operator showed that workers have already known the duties and responsibilities of each in the implementation of SCCS in accordance with the procedure owned.

3.8.6

The procedure for internal audit mentioned in the Procedure of Internal Audit (No. SCCS-IA/RSPO/PSQM/04 dated 1 March 2018). Based on that procedure internal audit carry out minimum one times a year. Based on document review, the company show the record evidence regarding internal audit of RSPO SCCS that conducted on 01 – 04 March 2023. Based on result of internal audit, there is 1 non conformity and it has been closed on prior the surveillance audit carried out and complied with RSPO Supply Chain requirements for mills and the RSPO Rules on Market Communications and Claims.

Management Review of RSPO SCCS implementation conducted on 10 December 2021. The management review discussion has covered the input from internal audit result, correction and corrective action, process performa and product compliance, follow up of previous management review, and recommendation for improvement.

3.8.7

Records of FFB acceptance from certified and uncertified FFB has been well documented by the company as described below:

Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Apr-22	1,587.69	4,467.99	6,055.68
May-22	1,674.46	5,659.16	7,333.62
Jun-22	2,569.11	7,288.07	9,857.18
Jul-22	2,439.77	7,183.15	9,622.92
Aug-22	2,673.09	8,025.07	10,698.16
Sep-22	2,030.76	7,419.30	9,450.06
Oct-22	2,252.77	7,254.25	9,507.02
Nov-22	1,356.81	6,796.50	8,153.31
Dec-22	2,036.57	6,170.10	8,206.67
Jan-23	1,835.28	5,386.24	7,221.52

Feb-23	1,582.89	4,700.39	6,283.28
Mar-23	1,184.63	1,917.09	3,101.72
Total	23,223.83	72,267.31	95,491.14

Estimated certified product recorded in the last assessment report and certificate, as well as in the RSPO IT Platform. Actual certified produced has been verified during this assessment and not exceed from projections. The estimates of certified production for the next license period also have been set, in reasonable amount considering the last year's production. The data are shown in the following table:

	Last Year Projected Certified Volume (MT)	Actual production in April 2022 – March 2023	Estimation for the next 12 months
FFB Processed	29,500	23,223.83	25,000
CPO Production	6,350	4,704.69	5,375
PK Production	1,450	992.83	1,125

3.8.8

During the starting date of the license until the audit, there is no sales of RSPO certified product (CSPO and CSPK). However, there were selling of CSPO and CSPK as conventional during this period, and has been removed from certified stock or allocated to credit

3.8.9; 3.8.10 & 3.8.11

The Mill has imposed provisions that must be applied by contractors as contained in the work agreements or Supply Chain Procedure (SCCS-Std/RSPO/PSQM/02, Revision 3, 01 December 2020), clausal 4.4 (Outsourcing activity) which described when the certifying organization outsources activities to independent third parties (eg subcontractors for storage, transportation or other outsourcing activities), the certifying organization must ensure that the third parties comply with the RSPO SCCS requirements.

Ladang Panjang Factory doesn't outsource refining and crushing activity. The company uses third party contractors for CPO and PK transportation activities. For transportation of certified products, the company uses contracting services. Based on the contractor's list, there are one contractors CPO and PK namely PT Putra Empat Zheed and the relationships been ruled in the work agreement that approved by both parties (agreement No 034/Pengangkutan CPO PK/BGR-LPF/VI/2022 dated 01 June 2022 valid thru 31 May 2024.

Since last assessment it was known there is no new contractors and there is no certified product sold as claimed RSPO certified product. The contractors and certified holder also have an agreement related to transparency of contractor operational mechanism, and it's confirmed during audit where auditor can contact the contractors.

3.8.12

Based on documents verifications and interviews with management it was known if all FFB processed are sourced from RSPO certified and non-certified. Documentation for the Sustainable Crude Palm Oil (Sustainable CPO) consists of daily record of the FFB acceptance, the daily record of CPO production, which is classified as the CSPO, sale record, stock record that has been reconciled with the FFB acceptance, monthly production, and sale and annual recapitulation, as described below:

Crude Palm Oil

Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)			Total
	Cert	Non-Cert		RSPO	Other Scheme	Non-Cert	
Opening Stock	695.36	-	695.36				

Apr-22	322.83	951.24	1,274.08	0	0	348.76	348.76
May-22	347.37	1,143.29	1,490.66	0	0		
Jun-22	532.37	1,507.01	2,039.38	0	0		
Jul-22	491.81	1,432.70	1,924.51	0	0		
Aug-22	530.32	1,623.26	2,153.58	0	0	436.32	436.32
Sep-22	409.62	1,498.62	1,908.24	0	0	478.63	478.63
Oct-22	456.97	1,460.23	1,917.19	0	0	945.66	945.66
Nov-22	280.53	1,392.44	1,672.96	0	0	728.30	728.30
Dec-22	414.90	1,281.71	1,696.62	0	0	713.11	713.11
Jan-23	375.15	1,071.22	1,446.37	0	0	368.76	368.76
Feb-23	318.68	944.92	1,263.60	0	0	819.45	819.45
Mar-23	224.15	319.93	544.08	0	0		
Sub Total April 2022 – March 2023	4,704.69	14,626.58	19,331.27	0	0	4,490.23	4,490.23
Grand Total	5,400.05		20,026.63				

CSPK

Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other Scheme	Non Cert	
Opening Stock	159.73		159.73				
Apr-22	66.40	195.65	262.05	0	0		
May-22	71.43	235.09	306.52	0	0		
Jun-22	116.73	330.44	447.17	0	0		
Jul-22	111.80	325.69	437.49	0	0		
Aug-22	116.99	358.08	475.07	0	0		
Sep-22	88.27	322.94	411.21	0	0		
Oct-22	96.39	308.02	404.42	0	0	90.92	90.92
Nov-22	57.39	284.89	342.28	0	0	252.73	252.73
Dec-22	82.64	255.28	337.92	0	0	203.59	203.59
Jan-23	74.37	212.37	286.74	0	0	131.26	131.26
Feb-23	61.35	181.91	243.26	0	0	83.03	83.03
Mar-23	49.07	70.04	119.11	0	0	180.01	180.01
Sub Total April 2022 – March 2023	992.83	3,080.40	4,073.23	0	0	941.54	941.54
Grand Total	1,152.56		4,232.96				

3.8.13; 3.8.14

Based on document verifications and interview with management it was known if there is no conversion rate of production of CPO (OER) and PK (KER) that applied by the mill. The production of CPO (OER) and PK (KER) are based on actual daily, monthly, and yearly production.

3.8.15

SCSS module used in Ladang Panjang POM is Mass Balance (MB), because the mill receives FFB from source that non-certified RSPO.

3.8.16

Documentation for the Sustainable Certified Product (CSPO and CSPK) consists of a daily record of the FFB acceptance, a daily record of certified production, which is classified as the CSPO and CSPK, a sales record, a stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation. Based on documents verifications and interviews with management units obtained information since April 2022 - 2023 it was known there is no sales of RSPO certified product (CSPO and CSPK). However, there were selling of CSPO and CSPK as conventional during this period, and has been removed from certified stock or allocated to credit as described below:

Stock Transaction ID	Date	Product	Transaction Type	Volume (MT)
ST-TR-d5fe5af0-ae51	21-02-2023	CSPO	Credit Allocation	6050
ST-TR-1da439ee-e1cc	13-04-2023	CPSK	Remove From Certified Stock	052

3.8.17

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

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

The policies regarding human rights described in the Sime Darby human rights charters February 2017 that's described respect the rights of their employees, workers in their operations and communities through the commitments which include, but are not limited to providing equal opportunities, respecting freedom of association, eradicating any form of exploitation, ensuring favourable working conditions, enhancing safety and health, respecting community rights and the rights of indigenous people, protecting the rights of vulnerable people, protecting the rights of children, eliminating violence and sexual harassment. Furthermore, the policy regarding prohibiting retaliation against Human Rights Defenders (HRDs) ruled in the Code of Business Conduct (February 2022) Which described The Group does not tolerate retaliation against individual who discloses any actual or suspected violations in good faith. The spokes did not suffer harassment, retaliation, or adverse employment consequence for speaking up or cooperating in an investigation.

Based on the explanation above, during the past year there were no issues / incidents of human rights violations that occurred in the vicinity or the operational area of the certification unit so that there were no acts of intimidation / violence carried out by the certification unit including contracted services such as security services that were contracted and others.

4.1.2

Based on interview with stakeholder such as communities surrounding the company (representative of Village of Ladang Panjang Village, Sungai Gelam, Trimulya Jaya, Cooperative of Karya Mandiri and Cooperative of Marga Jaya) labor union, and workers known that there is no indication of human rights violation. Based on field visit also known that the company does not use mercenaries and paramilitaries in its operations.

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

Mechanism for consultation and complaints is listed in some procedure, such as:

- SOP for Handling Public Complaints (SPO/6.3/PKM) with document number SOP/005/BSC/2016 No. revision 01/Rev/RSPO/P&C/PPK dated November 1, 2016. This procedure explains that public complaints can be submitted by telephone at the contact number provided in each unit.
- SOP for Handling Employee Complaints (SPO/6.5/PKK) with document number SOP/006/BSC/2012 No. revision 01/Rev/RSPO/6.5/PKK dated November 1, 2012. The procedure explains that public complaints can be submitted by telephone at the contact number provided by the assistant at each emplacement location.
- SOP for Handling Stakeholder Complaints No. 001 revision 0 dated 31 October 2020. The procedure aims to ensure that the stakeholder complaint handling system (internal and external) can be understood by stakeholders including those who are illiterate. In the procedure it is explained that the company provides illustrated information regarding the submission of complaints.

The procedure above has explained about the person in charge of receiving and resolving complaints (external and internal officers including HRD), response timeframe, confidentiality of the reporter and whistleblower, until further handling of complaints is possible to a tripartite level. (Mediation and settlement by government). Procedure is available in Bahasa Indonesia and if there are any complaints/grievances that the resolution that has not found mutually, the complainants can bring that compliance to RSPO Complaints System.

All of the above procedures were made by the certification unit as a reference for carrying out communication activities, resolving complaints and conflicts that occurred during certification unit carrying out its operational activities. Although the procedure was made by the certification unit, parties who are relevant stakeholders such as the surrounding village communities have also been given socialization regarding this matter and since 2022 until January 2023 there have been no problems in the procedure. This is in accordance with the results of interviews with stakeholder, which stated that the existing communication, complaint and conflict resolution procedures were deemed not burdensome to the village and its community.

Based on this explanation, it can be concluded that the certification unit has procedures/communication systems, complaints and conflict resolutions available for all affected parties, can resolve disputes effectively, in a timely and appropriate manner, and ensure the protection of the identity (anonymity) of the complainant, human rights defenders, community representatives, whistleblowers, if requested, as long as the report is supported by sufficient preliminary evidence. This system ensures there is no risk of retaliation or intimidation and follows the RSPO policy of respect for human rights.

4.2.2

To ensure that everyone (people who cannot read and write) can understand the existing procedures in the system implemented by the company, which is to provide flexibility for stakeholders or employees to make complaints accompanied by representatives who can read and write. This procedure is a technical guideline in receiving various complaints submitted by stakeholders or other related parties. and the resolution process. The procedure also ensures that everyone (people who cannot read and write) can understand the procedures in the system implemented by the company, namely providing flexibility for stakeholders or employees to submit complaints accompanied by representatives who can read and write.

However, the results of interviews with representatives of surrounding communities, the community has known about the communication procedures and to people who served as communicators between the company and community so that people who cannot read / write can be informed by the related communicators.

Based on the explanation above, it can be concluded that the certification unit has procedures to ensure the system is understood by affected parties, including those who cannot read and write that are well documented.

4.2.3

Based on the results of a review of the external complaint register book document for the 2022 period until 2023, it is known that during this period there were no complaints or grievance submitted by stakeholders to the company. This is in accordance with the results of interviews from the surrounding community which stated that during 2022 these stakeholders have never submitted complaints or grievance to the company, and if there is complain has been submitted it has been well responded well by the company so far.

In addition to no complaints submitted by external parties, the company has also properly documented the handling of complaints internally. This is evidenced by the existence of a complaint book available in each unit. Based on the results of interviews with estate workers, mill and representatives of the labor union, it is known that the workers have a good understanding of the complaint submission procedures established by the company and every complaint submitted has been recorded in the complaint book in each unit. Every complaint submitted in 2022 is only in the form of complaints related to the facilities provided by the company.

Opportunity for Improvement (OFI)

Based on the results of a review of internal complaint book documents, it is known that there have been several complaints submitted since 2022-2023 which have been recorded in the complaint book. However, the book does not have some information such as the date the complaint was received, the date the complaint was responded to, and the current status has been completed. This is because the company still plans that these complaints will be included in the application so that the recording is only done on a temporary basis.

Currently the company is implementing a new system for reporting worker complaints, especially for house problems in the Home Improvement Application (APR) which has been installed in each house with a barcode system. However, not all workers have used it and understood it, so the company still uses manual methods to record it.

The company has the opportunity to ensure that the APR system (House Improvement Application) can be understood/applied as a whole and that complaints related to houses that were previously reported manually have been properly monitored in a timely manner.

4.2.4

In Indonesia, giving freedom to the reporting party to obtain legal and technical assistance from an independent party is allowed and there is no regulation/procedure in certification unit that forbids it. An example is the resolution of the problem described above in which the company provides options/options to the heirs to obtain legal assistance from other independent parties.

Based on the results of document review, it is known that conflict resolution mechanisms can use the option to obtain legal and technical assistance from independent parties, this can be proven by the existence of conflict resolution related to land clearing and plasma land development between companies and communities involving NGOs and the RSPO, in addition, the company also has records regarding every progress of the conflict resolution process.

Results of interviews with surrounding village which stated that when their residents had disputes or land claims to the company in previous years, the community was given the freedom to ask for legal and technical assistance from independent parties such as lawyers. and other parties to manage this matter. This proves that the certification unit in general has carried out its procedures to give the reporting party the freedom to obtain legal and technical assistance from a third party in the event of a dispute.

Based on the explanation and description above, it can be concluded that the certification unit has a conflict resolution mechanism/procedure which includes the option to obtain legal and technical assistance from an independent party, where the reporting party has the freedom to choose a person or group who can support it and/or act as observers as well as the parties may choose the option of involving a third-party mediator.

Status: Comply

4.3

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

4.3.1

The unit of certification can present CSR program for period 2022/2023. The programs categorized eight (8) aspects as follows:

- Religious aspect
- Educations aspect
- Sports aspects
- Infrastructure aspects
- Disaster aspects
- Social for elderly aspects
- Work opportunity aspects
- Government aspects

Result of interview with local communities surrounding the company it was known the program developed based on identifications or social assessment routine in line with community development meeting (*musrembang*) where the results used as consideration to develop CSR programs.

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

PT Bahari Gembira Ria managed area covering 2998.23 Ha with total planted 2808.97 Ha, However the scope of certification covering an area of 1,202.04 ha in line. The area has had land title of HGU, and plantation permit of IUP as follows:

- HGU Certificate No. 4 of 2003, covering an area of 1,202.04 Ha is valid until May 6, 2038.
- Plantation Business Permit based on the Decree of the Head of the Integrated Service Agency of Muaro Jambi Regency No. 503/02 / BPTSP / 2014 dated 30 January 2014 covering an area of \pm 3,382.04 ha and the Palm Oil Processing Unit with a capacity of 45 tons FFB / hour.

The rest of area PT Bahari Gembira Riau were excluded from scope of certifications planned to be certified in 2023. The history of previous land ownership has been described in the HGU Decree, that the HGU area formerly were community land of Ladang Panjang Village, that has been compensated from 91 owners in the era of 1996 to 1999.

4.4.2; 4.4.4; 4.4.5

PT BGR are a long-established company that has been started operationally in the early period of 1990, were on that's period, the FPIC concept not yet available, thus the FPIC process also still incompletely and unspecifically, such as no participation mapping of landowner that entitled to compensation. However, based on land acquisition documents, interviews with village head as well as community elderly (public figure) surrounding company, can be concluded that the land acquisition processes had been conducted in FPIC manner. For instance, the documentations shown had been made in Indonesian language and available for both parties, based on the agreed price and no coercion, involved, and signed by community representatives such as Village Heads and Sub-District Heads. Furthermore, they stated that Company never conducted any intimidation/coercion and never use paramilitary during the negotiation process. They have enough time to negotiate and meet the decision to become part of palm oil plantation development. The process has been made in Bahasa, Local Language, and provided by participatory mapping. The compensation documents consist of several complete documents including:

- Payment receipt
- A statement of willingness to hand over arable land
- Land certificate from the village
- Declaration of ownership of arable land
- Declaration of surrender of arable land / Sale and Purchase

- Copy of identity card

Although PT BGR has gained land rights legally, there are still many people using and cultivating in the permit areas, it's due to the owner not willing to be compensated. The company has been identified various land use in permit Areas, including area width. The unit of certifications presented minutes of Survey of Identification occupied area and abandoned area) PT BGR were conducted on 13 January 2022. Based on documents survey in the certification area there are seven (7) area categorized as abandoned land or occupation area with the total area covering 85.02 Ha. Those area has been identified which described locations area, estimate covering area, coordinate, and land covers. That's areas managed by the community are palm oil, rubber, or horticulture. In other information, there is no significant land conflict in PT. BGR elated to the existence of arable areas in the company's permit area,

As a guidance during land compensation as well as FPIC Guidance the company has had an several procedures, that mentioned in the documents Land Acquisition and Compensation, document No. 343/PSD-OKUP/11 dated 23 February 2023. in the procedure described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right.

4.4.3

The company can show a map showing legal rights in the form of a HGU boundary map with a scale of 1: 50,000 contained in the HGU certificate issued by the Land Office. Based on public consultation with village representatives it is recognized that they know the legal boundaries owned by PT BGR

4.4.6

As mentioned in indicator 4.4.2 PT BGR is a long-established company that has been started operationally in the early period of 1990, were on that's period, the FPIC concept was not yet available. Based on document verifications, interviews with communities, and management obtained information until the audit was carried out, there is no expansion of area so there is no land compensation activity. last compensation has been finished in 1999. Records of the land compensation process consist of documents of land identification and inventory, land location maps, statement of the release of land rights by the owner, Receipt of Payment, Minutes of compensation/Compensation, and witnesses. Besides that, the implementation of FPIC was demonstrated also in social impact assessment and HCV assessment.

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

Based on document review of areal statement, interview with management, and field observation, it is known that there is no new planting activity after 1 January 2010.

Status: Comply

4.6

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

4.6.1, 4.6.2, 4.6.3, 4.6.4

PT BGR are a long-established company that has been started operationally in the early period of 1990, were on that's period, the FPIC concept not yet available, thus the FPIC process also still incompletely and unspecifically, such as no participation mapping of landowner that entitled to compensation. However, based on land acquisition documents, interviews with village

head as well as community elderly (public figure) surrounding company, can be concluded that the land acquisition processes had been conducted in FPIC manner. For instance, the documentations shown had been made in Indonesian language and available for both parties, based on the agreed price and no coercion, involved, and signed by community representatives such as Village Heads and Sub-District Heads. Furthermore, they stated that Company never conducted any intimidation/coercion and never use paramilitary during the negotiation process. They have enough time to negotiate and meet the decision to become part of palm oil plantation development. The process has been made in Bahasa, Local Language, and provided by participatory mapping. The compensation documents consist of several complete documents including:

- Payment receipt
- A statement of willingness to hand over arable land
- Land certificate from the village
- Declaration of ownership of arable land
- Declaration of surrender of arable land / Sale and Purchase
- Copy of identity card

Although PT BGR has gained land rights legally, there are still many people using and cultivating in the permit areas, it's due to the owner not willing to be compensated. The company has been identified various land use in permit Areas, including area width. The unit of certifications presented minutes of Survey of Identification occupied area and abandoned area) PT BGR were conducted on 13 January 2022. Based on documents survey in the certification area there are seven (7) area categorized as abandoned land or occupation area with the total area covering 85.02 Ha. Those area has been identified which described locations area, estimate covering area, coordinate, and land covers. That's areas managed by the community are palm oil, rubber, or horticulture. In other information, there is no significant land conflict in PT. BGR elated to the existence of arable areas in the company's permit area.

As a guidance during land compensation as well as FPIC Guidance the company has had an several procedures, that mentioned in the documents Land Acquisition and Compensation, document No. 343/PSD-OKUP/11 dated 23 February 2023. in the procedure described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right.

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;

PT BGR are a long-established company that has been started operationally in the early period of 1990, were on that's period, the FPIC concept not yet available, thus the FPIC process also still incompletely and unspecifically, such as no participation mapping of landowner that entitled to compensation. However, based on land acquisition documents, interviews with village head as well as community elderly (public figure) surrounding company, can be concluded that the land acquisition processes had been conducted in FPIC manner. For instance, the documentations shown had been made in Indonesian language and available for both parties, based on the agreed price and no coercion, involved, and signed by community representatives such as Village Heads and Sub-District Heads. Furthermore, they stated that Company never conducted any intimidation/coercion and never use paramilitary during the negotiation process. They have enough time to negotiate and meet the decision to become part of palm oil plantation development. The process has been made in Bahasa, Local Language, and provided by participatory mapping. The compensation documents consist of several complete documents including:

- Payment receipt
- A statement of willingness to hand over arable land
- Land certificate from the village
- Declaration of ownership of arable land
- Declaration of surrender of arable land / Sale and Purchase

- Copy of identity card

Although PT BGR has gained land rights legally, there are still many people using and cultivating in the permit areas, it is due to the owner not wanting to be compensated. The company has been identified various land use in permit Areas, including area width. The unit of certifications presented minutes of Survey of Identification occupied area and abandoned area) PT BGR were conducted on 13 January 2022. Based on documents survey in the certification area there are seven (7) areas categorized as abandoned land or occupation area with the total area covering 85.02 Ha. Those areas have been identified which described locations area, estimate covering area, coordinate, and land covers. That's areas managed by the community are palm oil, rubber, or horticulture. In other information, there is no significant land conflict in PT. BGR elated to the existence of arable areas in the company's permit area.

As a guidance during land compensation as well as FPIC Guidance the company has had an several procedures, that mentioned in the documents Land Acquisition and Compensation, document No. 343/PSD-OKUP/11 dated 23 February 2023. in the procedure described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right.

4.7.3

The company can show recapitulation of previous landowners who have been compensated. Compensation is only made for the area within HGU areas owned by the company and was completed in 1999. Based on interview with management of PT BGR and related government agencies of Muaro Jambi District, it known that the certificate holder has no expansion area for new planting area.

Based on public consultation with village representatives from Ladang Panjang Village, Petaling Village and Trimulya Jaya Village, the communities that have lost access and rights to land also provided opportunities to benefit from plantation development such as benefit in the form of CSR program and plasma plantation.

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

As a guidance to settlement land dispute the company has had procedure to handling and manage land conflict namely Land Dispute Settlement Procedure (*Prosedur Penyelesaian Konflik/ RSPO/2.2/L dated 01 August 2023*)) with the aims as technical guidance or SOP to ensure decision steps or actions by the company regarding dispute settlement were carried out appropriately and correctly based on the provisions and regulations of applicable laws, culture, or customary laws that apply in the community. This procedure contains specific guidance to manage land conflict such as gathering information, conducting a meeting with complainant and use the understanding language during the process. As explained by the management representative, a mutually agreed upon system for handling complaints will be established when a conflict is found.

4.8.2; 4.8.3; 4.8.4

Until this assessment, there were no open conflicts and land disputes within the Certification area. This is also in line with the results of interviews with surrounding communities (Sungai Gelam, Trimulya Jaya and Ladang Panjang) which stated that there were no land conflicts in the company's operational area. Although PT BGR has gained land rights legally, there are still many people using and cultivating in the permit areas, it's due to the owner not wanting to be compensated. The company has been identified various land use in permit Areas, including area width. The unit of certifications presented minutes of Survey of Identification occupied area and abandoned area) PT BGR were conducted on 13 January 2022. Based on documents survey in the certification area there are seven (7) area categorized as abandoned land or occupation area with the total area covering 85.02 Ha. Those areas have been identified which described locations area, estimate covering area, coordinate, and land covers.

That's areas managed by the community are palm oil, rubber, or horticulture. In other information, there is no significant land conflict in PT. BGR related to the existence of arable areas in the company's permit area.

Based on field observation in occupied area its known if that area is ex rubber plantations. For areas that are currently still controlled by the community (occupational area) and have never been compensated the company respects the existence and didn't force to give the land to the company. The area was clearly bounded by roads and ditches.

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1

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

5.1.1; 5.1.2; 5.1.3

The determination of the FFB price to the Plasma Cooperatives follows the determination of the FFB price from the Jambi Province FFB Pricing Team, based on the results of interviews with representatives of Cooperative such as from Karya Mandiri Cooperative and Marga Jaya Cooperative, it is known that the FFB price set by the company is based on the price from the Jambi Province Plantation Service. Information regarding the price of FFB will be conveyed by the company via WhatsApp message. In addition, cooperative representatives are also involved in the FFB price determination meeting.

The company has shown the FFB price document which refers to the FFB price determination letter every 1 week from the Jambi Province Plantation Office. This pricing is publicly available and always available at the factory. The determination of the FFB price is always known by the plasma farmers because every week when there is an update on the FFB pricing, the company always provides information to the head of the cooperative to be informed to all its members. This is in line with the results of consultations with the cooperative management from Karya Mandiri Cooperative and Marga Jaya Cooperative who stated that information related to FFB pricing is known every week via telephone.

5.1.4

Based on the results of interviews with the head of cooperative of Karya Mandiri Cooperative and Marga Jaya Cooperative, it is known that the cooperatives have understood the contract/MoU with the company and there was no coercion from the company. So far, the cooperation with the company has been going well and the cooperative has the authority to make decisions.

5.1.5

The company can show cooperation agreements with Plasma Cooperatives such as Karya Maju Cooperative, Marga Jaya Cooperative, Manggar Jaya Cooperative, Mitra Inti Cooperative, and Karya Mandiri Cooperative. For example, the company can show a cooperation agreement between PT Bahari Gembira Ria and KUD Marga Jaya. Meanwhile, the Karya Mandiri Cooperative agreement is stated in the Cooperation Agreement with KUD Marga Jaya because the Karya Mandiri Cooperative was originally part of the Marga Jaya Cooperative. The cooperation agreement between PT Bahari Gembira Ria and the Marga Jaya Cooperative was signed on 27 May 2004 with the scope of the agreement on development, processing, maintenance and harvesting as well as marketing of crops from oil palm plantations under the PIR-TRANS pattern. The validity period of this cooperation agreement is until the age of the oil palm plantations reaches 25 years or until the oil palm plantations no longer have economic value.

5.1.6

Based on the document review, there was a purchase of FFB in the company's business unit. The company shows several proofs of payments to local contractors or vendors, for example, payments to collectors on behalf of Karya Mandiri Cooperative for period of January 2023. Payment records contain completeness such as length of work, sales invoices, minutes, and fruit introduction letters to proof of payment via bank transfer. Payment records are by the price determined and informed by the company and third-party agreements. Based on consultations with FFB suppliers such as Karya Mandiri Cooperative, there were no negative issues related to the realization of contractor agreements. Prices are set according to government regulations. Even

the results of interviews with KUD are also known to be quite competitive with other companies and there has never been a late payment.

Based on the results of interviews with the Karya Mandiri Cooperative and the Marga Jaya Cooperative, it is known that so far there have been no complaints regarding the price or payment of FFB made by the Company. The cooperation between Plasma Farmers and the Company is going quite well.

5.1.7

The company has tested the weighing equipment in 2021 and is set to test the weighing equipment again in December 2022.

The company has made a request to test the weighing equipment again before December 2022, via the following communication:

- On September 12, 2022, PT BGR made an Internal Memo Office-to CV Mandiri Jaya number 061/BGR-LPF/External/IX/2022 regarding the Request for Offer for Re-Casing of Electronic Bridge Scales for Two Units of Full Loadcell Electronic Type Scales Brand Mettler Toledo and Avery Weight Tronix.
- CV Mandiri Jaya letter number 120/CV.MJ-JBI/SRT/IX/2022 regarding the Request for Calibration/Re-Calibration on September 13, 2023. The examiner sent a letter to the Head of the UMKM Cooperative, and Industry and Trade Service.
- CV Mandiri Jaya sent a letter to PT Bahari Gembira Ria with letter number 035/CV.MJ-JBI/SRT/II/2023 on 18 February 2023, regarding a Statement Letter that CV Mandiri Jaya has not been able to carry out PT's Scale Bridge Re-calibration Work at PT Bahari Gembira Ria in 2023.
- CV Mandiri Jaya sent a letter back to PT Bahari Gembira Ria with letter number 067/CV.MJ-JBI/SRT/IV/2023 on April 5, 2023, regarding a statement that CV Mandiri Jaya has not been able to carry out the Re-calibration Work of the Weigh Bridge PT Bahari Gembira Ria in 2023. CV Mandiri Jaya has submitted a Re-Calibration Application to the Metrology Service and is currently still waiting for confirmation of the implementation schedule.

Companies are encouraged to ensure that the implementation of weighing equipment calibration can run positively and can be conducted in 2023. (OFI)

5.1.8

The company has supported independent smallholders with RSPO certification. The results of interviews with company representatives revealed that currently the plantation management of Karya Mandiri and Marga Jaya Cooperatives has been managed independently by farmers. The company carries out supervision in terms of plant care, harvesting, etc. The results of interviews with the Karya Mandiri and Marga Jaya Cooperatives revealed that currently the two cooperatives have been certified RSPO for Independent Smallholders.

5.1.9

The mechanism for handling complaints from smallholders has been regulated in the SOP for Handling Public Complaints dated April 11, 2013. In the procedure it is stated that every public complaint must be received and recorded for later completion and the manager must provide protection to the complainant or complainant. Based on the results of the verification of the external complaint logbook document, and based on interview with Marga Jaya cooperative representatives, it is known that there were no complaints from farmers during 2022 until April 2023.

Status: Comply

5.2

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

5.2.1

The Company has consulted with the plasma smallholders who supply the FFB to the Company. Currently, the plasma farmers of the Karya Mandiri Cooperative and the Marga Jaya cooperative have received RSPO certificates. The results of interviews with company representatives revealed that currently the management of plasma plantations is carried out by plasma farmers, while the company supervises plasma farmers.

5.2.2

The Company has consulted with the plasma smallholders who supply the FFB to the Company. Currently, the plasma farmers of the Karya Mandiri Cooperative and the Marga Jaya cooperative have received RSPO certificates. The results of interviews with company representatives revealed that currently the management of plasma plantations is carried out by plasma farmers, while the company supervises plasma farmers. For other plasma cooperatives, the company has disseminated understanding related to the RSPO.

5.2.3

The Company has consulted with the plasma smallholders who supply the FFB to the Company. Currently, the plasma farmers of the Karya Mandiri Cooperative and the Marga Jaya cooperative have received RSPO certificates. The results of interviews with company representatives revealed that currently the management of plasma plantations is carried out by plasma farmers, while the company supervises plasma farmers. For other plasma cooperatives, the company has disseminated understanding related to the RSPO. The results of interviews with plasma cooperatives show that the current legal status of plasma lands is in the form of SHM.

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 2022, which was attended from KUD Karya Mandiri.

5.2.5

The company has reported the progress of the plasma smallholder program in the Plantation Business Development Report which was reported to the Muaro Jambi Regency Government on February 7, 2022, which informs the company's development of plasma plantations and the training provided to farmers.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1

Certification unit have a Code of Business Conduct (COBC) of Sime Darby Plantation which has been effective since April 2022 for Sime Darby Plantation and all of its subsidiaries. It explains that the unit of certification is committed to providing equality in employment opportunities to every employee. Our beliefs and labor standards confirm that we will not discriminate when making decision to employees, promotion or retire works/candidates based on race, color, sex, age, social class, religion, sexual orientation, politics, or disability-only subject to the conditions attached to the role to be performed. The fundamental aims are to ensure diverse and representative profiles of workers through the promotion of equality of labor.

The results of the employment document review prove that certification unit does not discriminate and treat all workers equally, the following is evidence that can be shown by the company:

- The composition of workers consisting of various ethnic groups, religions, gender and workers' origins. The existing workers do not only come from one ethnic but come from several ethnic spread throughout Indonesia such as Aceh, Malay, Javanese and others. During the audit, there was no information regarding migrant or AKAD workers (*Angkatan Kerja Antar Daerah*) in certification unit.
- Recruitment of workers based on the results of selection, performance appraisal, ability and expertise of workers. All the recruitment received based on the results of the selection of job application files, results of health checks and results of interviews. The worker also passed the test and has been accepted as a permanent worker.
- Worker placement and training are carried out in accordance with their expertise / type of work, such as prospective harvest workers are placed as harvest workers and receive regular harvest training.
- Women workers are given equal rights, wages and opportunities to get promotions with male workers of the same type of

work, for example there are several maintenance foremen who are female workers.

Based on the results of interviews with workers (harvester, pesticide applicator, upkeep and mill operator) at plantation and mill, it is known that workers have never felt that the company has discriminated against since they first working until now. This is because all activities from recruitment, performance appraisal, promotion, and union, each worker is given the same opportunity regardless of ethnicity, caste, nationality, religion, disability, gender, sexual orientation, gender identity, membership in union, affiliations, politics, or age. There is no difference between the communication between superior and workers because of the things mentioned above, so that the workers do not feel isolated or discriminated against by the superiors.

These explanations can conclude that the certification unit has policy and treated all workers equally (based on skill, quality and eligibility) without discrimination based on gender, ethnicity, religion, health conditions or others and has carried out all recruitment activities in accordance with applicable policies and procedures. owned without any act of discrimination.

6.1.2

In accordance with the explanation in indicator 6.1.1 regarding company policies and their implementation, during the audit process there were no discriminatory acts or issues that occurred in the certification unit during the past year. This is evidenced by the results of interviews with labor union representatives and the gender committee which stated that so far, the company has always been fair, there has been no discrimination against workers, starting from the local community, women and migrant workers (even though migrant workers are not owned). So far, the certification unit has also never charged a fee during the recruitment period. This is indicated by the announcement of job vacancies submitted to the surrounding community, which includes the writing "Free Employee Acceptance". This was also informed by representatives of the surrounding community who stated that so far, the recruitment carried out by the company had never asked for a fee (it was free).

Based on the explanation above, it can be concluded that the unit of certification has proven that workers and groups including local communities, women and migrant workers are not discriminated against nor are there fees for recruiting workers.

6.1.3

The certification unit has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Collective Labor Agreement period 2022-2023 (Estate and Mill) written in Bahasa. In general, these procedures describe:

- Recruitment of workers is based on needs and adjusted to the ability of the company.
- The age of the prospective worker is a minimum of 18 years at the time of recruitment of workers.
- Recruitment of workers is based on the ability, expertise, and assessment of prospective workers.
- The company is authorized to carry out the placement, transfer and promotion of workers in accordance with applicable regulations.
- Termination of employment can occur when a worker retires, dies, resigns, and terminates an employment agreement due to a serious violation and others.

As evidence that the company has carried out recruitment selection activities, providing access to training, and promotions are carried out on the basis of skills, abilities, quality and medical eligibility as required for available jobs described in indicator 3.5.2 related to assessment/competence-based recruitment and in indicator 3.7.1 it is explained that the training is prepared/planned based on the competency/position/type of work of each worker. From these two indicators it has been stated that all selection, training, medical eligibility and other activities have been in accordance with the procedures owned, for example there are no workers under 18 years of age who work/are accepted, there is no acceptance that does not match their needs/abilities, and so forth.

Based on this, it can be concluded that the certification unit has proven that selection, recruitment, employment, access to training, and promotion are carried out on the basis of skills, abilities, quality, and medical eligibility as required for available jobs and are well documented.

6.1.4

A pregnancy test for workers is carried out every month just to ensure that pregnant workers are not allowed to do work with chemicals, not as a basis for discriminating against these workers. If declared pregnant, the worker will be transferred to a safer job but still equal in terms of wages and other benefits, so that there is no discriminatory action. This is made clear by the results of interviews with women workers in the Ladang Panjang Estate in upkeep activities stating that female workers are required to have monthly pregnancy testing at the clinic to ensure that no female workers working with chemicals are pregnant / breastfeeding and testing the pregnancy is not a discriminatory measure given by the certification unit.

6.1.5

Certification unit have gender committee and are still active until today in the certification unit which is chaired by the chairperson along with coordinators in several sections and there are representatives in each unit. The structure of the gender committee not only consists of female workers but also includes male workers. The main objective of forming a gender committee is to provide a forum that can accommodate the aspirations / complaints of workers (especially women), as company partners in carrying out the activities of socialization related to gender and other policies related to workers' reproductive rights. In carrying out its activities this gender committee always collaborates with the labor union so that the socialization of matters related to women's rights can be conveyed properly and there is no discrimination in terms of gender. The workers also knew of the existence of the gender committee because it had been routinely socialized by its management, the last socialization related to the gender committee and the activity was carried out on 08 December 2022 which was attended by all workers and housing residents. The results of this socialization can be seen with the absence of differences in company operational activities such as promotional activities, the same status of workers without gender bias because overall are given equal opportunities for all genders (male or female) in work.

The results of interviews with upkeep workers (male and female workers) and representatives of the gender committee revealed that until now there were no reports / issues / complaints related to gender reported by the workers and at the moment the activities carried out were gender meetings during children healthcare (*posyandu*), women recitation weekly and others. Currently the certification unit is more focused on gender bias and equality for women because the most vulnerable parties in plantation operational activities are women, but this does not mean that the company does not focus on other genders. This is evidenced by the absence of any issues or incidents related to this from 2022 until now.

6.1.6

Equal payment of wages has been made by certification unit properly, taking into account the ability, performance, expertise, length of work and other factors as a basis for remuneration. So that the payment of wages provided is in accordance with the burden / duties / types of work respectively. For example, security (MAD & DKE), boiler operator (HMD & ILH), and harvester (MHS & SHM), who get wages in March 2023 whose value is in accordance with the minimum wage, but with different amounts based on years of service, ability, attendance and job performance (structure and scale wage). This is in an accordance with statements from workers who were interviewed with types of work as security, boiler operators, harvester and upkeep workers who have the same type of work but have different wage scales based on their performance, length of work in the company, productivity and other factors.

In addition, based on the results of interviews with labor union representatives, it was found that the certification unit already has a wage scale structure for each worker based on position, class, work performance, and not based on gender differences or origins. For example, the lowest wage scale is for permanent worker Grade H and the highest wage is permanent workers Grade A8.

The results of interviews with workers (harvesting, spraying, security and mill operators) in plantation and mill note that workers already know that there is a wage scale structure for each level of workers, and this has been proven by the difference in the monthly wage income presented on the pay slip. The monthly wages received are in accordance with the grade owned by each worker and so far, there have been no complaints / errors regarding this matter.

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 certification unit has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Collective Labor Agreement period of 2022-2023 and others manpower procedures written in Bahasa. This Collective Labor Agreement explains the working conditions and rights / obligations of workers such as, recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, overtime, and other provisions. The certification unit can show that the Collective Labor Agreement have been approved by related Agency such as:

- PT Bahari Gembira Ria still has a Collective Labor Agreement (CLA) for the 2023-2024 period between the company and the Management of the Work Unit of the Federation of Agricultural and Plantation Workers Unions - All Indonesian Workers Union SPSI (PUK - FSPPP - SPSI) PT Bahari Gembira Ria. The CLA for the 2023-2024 period has been ratified by the Head of the Muaro Jambi Regency Manpower and Transmigration Office in accordance with Decree No. 560.6/06/II/02/Nakertrans/2023 on 01 February 2023. In the decision, the validity period of this CLA is from 19 January 2023 to 19 January 2025. In the CLA, it is explained regarding standard wages, wage scale, overtime payments, insurance, job premiums and other explanations. All the rules contained in the CLA refer to the provisions of the laws in force in Indonesia.

The Collective Labor Agreement has been routinely disseminated by the certification unit to all employees, one example of the socialization that was carried out which was attended by all workers on muster morning. The results of interviews with workers (harvesters, sprayers, upkeep and mill operators) and labor union know that workers have a sufficient understanding of their rights (wages, overtime, incentives, fines, etc.) listed in the Collective Labor Agreement and in accordance with routine socialization provided by the certification unit. In addition, the pay slip also contains some information that is well understood by workers, such as basic wages, fixed benefits, overtime, premiums, wage deductions (fines, taxes, and others). Workers' wages in 2023 have been accordance with the minimum wage set by the government, wage based on years of service, ability, attendance and job performance (structure and scale wage) and there are no late payments every month.

A review of the March 2023 wage document for harvester, upkeep and mill operators proves that the wages received are in accordance with the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2023. For example, security (MAD & DKE), boiler operator (HMD & ILH), and harvester (MHS & SHM) have a different based on wage scale structure 2023.

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

6.2.2

The certification unit has Collective Labor Agreement are made in a Bahasa that explains the working conditions and rights / obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, working hours, remuneration, discipline, deduction, overtime, sick leaves, holiday entitlement, maternity leave and other provisions. The ratification of the Collective Labor Agreement has been explained in indicator 6.2.1. Explanations related to the contents of the Collective Labor Agreement include:

- Employee Acceptance (recruitment, selection, transfer, promotion, performance appraisal) which explains that all workers wishing to join the company must follow the specified requirements including: being over 18 years old, having a health certificate, taking a selection exam, and other requirements.
- Working Time which explains that there are 2 types of working time in the company, namely by working 8 hours per day or 5 working days in a week and 7 hours per day or 6 working days in a week, in which the total working hours are 40 hours in a week. a week.
- Wages which explain the wage that cannot be lower than the minimum wage set by the government every year, granting rice allowance to all workers according to its calculation, and other explanations.

In addition to being generally stated in Collective Labor Agreement, the certification unit also has a decree, policy, memorandum and work contract for workers in orientation period that specifically explain these matters. An example is:

- Minimum wage in 2023 is in accordance with the Muaro Jambi Regency Minimum Wage Decree that has been the established by the Governor of Jambi in 07 December 2022.
- Inter Office Mail No. 008/HRM-i5.1/SUSU/II/2023 dated January 2, 2023, issued by the Head of Human Resources Management (HRM) regarding the Structure and Scale of 2023 SKU Employee Wages for PT Bahari Gembira Ria. This document refers to Jambi Governor Decree No. 1069/KEP. GUB/DISNAKERTRANS-3.3/2022.
- Following the provisions in the second point above, the structure and wage scale for SKU workers in 2022 are described in 8 Grades and groups A-H with the lowest scale, namely SKU Grade H, while the highest wages are for SKU Grade A8 workers.

Since 2022 there has been no change in policy, but what has changed is the decision related to the minimum wage which has changed every year following the government's decision. Regarding the change in the minimum wage decision, it has been routinely submitted annually to workers at the beginning of the year and this is reinforced by the results of interviews with field workers and labor union representatives who are clear about any changes in the minimum wage every year.

The results of interviews with workers (harvesters, sprayers, upkeep and mill operators) and labor union know that workers have a sufficient understanding of their rights (wages, overtime, incentives, deductive, fines, etc.) listed in the Collective Labor Agreement and in accordance with routine socialization provided by the certification unit. Workers' wages in 2023 have been accordance with the minimum wage set by the government and there are no late payments every month, working hours is 40 hour a week with 6 days working in a week and for the overtime has been paid in accordance with applicable regulations.

Based on the foregoing, it can be concluded that the certification unit has procedures and provisions related to wages, work requirements (regular working hours, deductions, overtime, sick leave, vacation rights, maternity leave, etc.) well documented and thoroughly implemented in each unit.

6.2.3

In accordance with the explanation in the previous indicator (6.2.2), the unit of certification already has references/procedures governing regular working hours, deductions, overtime, sick leave, right to holidays, maternity leave, reasons for dismissal, notice period before dismissal, and other employment provisions. This is stated in the Collective Labor Agreement and other documents. The unit of certification has also been able to prove that all of these provisions have been implemented fairly well, including:

- March 2023 salary slips for, security (MAD & DKE), boiler operator (HMD & ILH), and harvester (MHS & SHM) have a different based on wage scale structure 2023 and all wages above the minimum wage.
- Overtime payment in March 2023 that has been in accordance with applicable laws for security (MAD & DKE) and boiler operator (HMD & ILH).
- List of women workers that has been given maternity leave and pregnant workers in January until December 2022.
- Unit certification has provisions related to deduction / penalty which have been stated in the Collective Labor Agreement and further explanation is set out in an internal memo.
- In the payroll document, there is information that states the results of the worker's wages in one month according to the work performance of each worker. Payroll has also been accurate for each worker, for example the number of days worked in a month, premium payments, fines, deductions from workers' wages and other information that is in accordance with facts in the field.
- Proof of granting annual leave to driver (SKR) on 14 February 2023 for 1 day starting from 14 January 2023. The application letter has been known by HR Group and approved by the Mill Manager.
- Proof of granting annual leave to bookkeeper (AUS) on 07 January 2023 for 2 days starting from 12-13 January 2023. The application letter has been known by HR Group and approved by the Estate Manager.
- Etc.

A review of the March 2023 wage document for harvesters, sprayers, upkeep and mill operators proves that the wages received are in accordance with the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2023. Based on the description above, the certification unit has demonstrated legal compliance related to working conditions, such as compliance with minimum wage, working hours, overtime, maternity leave and other compliance.

6.2.4

Based on the results of the document review, it is known that the company already has several welfare facilities for workers and their families who are currently in a fairly decent condition. These infrastructure facilities include:

- Permanent and semi-permanent.
- Places of worship such as mosques, and prayer rooms.
- Transport for school children, emergency transportation (ambulance) and so on.
- Sports fields such as tennis, volleyball, and others.
- Provision of clean water.
- Provision of electricity.
- Availability of First Aid Post units in each unit.
- Availability of Daycare in each unit.

Based on the results of field observations at housing locations, sports facilities, prayer facilities (mosques), first aid kit, daycare, and other facilities in plantations and factories it is known that all of these facilities are in good condition and can be used by all workers and their families. This is in line with the results of interviews with worker representatives and labor union representatives who stated that the welfare facilities provided by the company in the form of housing, sports facilities, prayer facilities (mosques), first aid kit, daycare, and others, can be used by all workers and their families.

6.2.5

Certification unit has made it easier for workers and their families to obtain food sources by providing easy access that sell the daily needs of workers and provide access to vegetable traders to sell in the workers' housing area. In addition, there are also workers who open small business stalls to sell daily necessities in each housing. Based on interviews with workers (harvesters, sprayers, upkeep and mill operators), housing residents, labor union and Gender Committee, it is known that workers have no difficulty in getting food sources because the certification unit has provided cooperatives that sell daily necessities and the existence of vegetable sellers given access to sell at home. In addition, workers can buy these needs into markets around the area of the company with less difficult access (there are traders who sell by using pompons/vessels to open their sales every day regularly moving from one division to another).

6.2.6

In Indonesia there is no set standard of living wage, so the certification unit still applies the national minimum wage for all workers. In addition to the payment of the minimum wage, the unit of certification has an assessment of the implementation of applicable wages and benefits in kind provided to workers in the unit of certification which are in line with the RSPO Guidelines for Implementing Living Wages.

The certification unit has the determination of assessment prevailing wage and all kind of benefits for Living Wage simulation in 2022 has been included in the calculation of main wage, worker status, housing facility, education, electricity, water sources, healthcare and others. All calculations made have been based on local prices and are still in the reasonable stage of calculation. The results of these calculations show that the standard of Living Wage currently given / simulated by the certification unit is above the stipulation of the minimum wage with scale of minimum.

Based on the explanation above, it can be concluded that the unit of certification has a Living Wage calculation based on prevailing wage and in-kind benefits provided by the certification unit.

6.2.7

In 2023, the company still has 28 workers with PKWT status and all of them have been registered with the Manpower and Transmigration Office of Muaro Jambi Regency. At the time the audit was carried out, all 28 PKWT workers had become permanent workers since March 2023. So that currently no workers with PKWT status have worked at PT Bahari Gembira Ria since April 2023.

Based on this, it can be concluded that previously the company still used workers with PKWT status, but now all of them have become permanent workers and there are no PKWT workers working at the company (all workers are permanent workers).

Status: Comply

6.3

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

6.3.1

Certification unit has a Sime Darby Plantation Code of Business Conduct (COBC) which has been effective since April 2022 for Sime Darby Plantation and all of its subsidiaries. Point 5.7 on Human Rights in the section "Respecting Freedom of Association" explains that the company is committed to respecting workers' rights to join and form organizations of their choice and to bargain collectively. In addition, certification unit has a Collective Labor Agreement which states that workers have the right to establish labor unions and become members / leaders of labor unions in accordance with applicable regulations. The information on freedom of association listed in the Collective Labor Agreement was carried out regularly and the last socialization was held on 08 December 2023.

At present there are 2 active company unions, namely PUK SPSI in the Ladang Panjang Estate Unit and PUK SPSI in the Ladang Panjang Factory Unit, all of which have been registered and registered with the Manpower and Transmigration Office of Muaro Jambi Regency as the Workers Union of PT Bahari Gembira Ria.

Based on interviews with labor union representatives, it is known that currently have a union that sufficient to accommodate all the aspirations of the workers in the estate and mill units. This was further in accordance with interviews with estate and mill workers who stated that the current labor union had adequately carried out its duties and responsibilities and that workers were given the freedom to choose their representatives to participate in the management of union in estates and mills. In addition, the certification unit has given freedom to all its workers if they really want to associate or join the management of the labor union, and this has been routinely socialized every year.

Based on the explanation above, it can be concluded that the unit of certification has published a statement recognizing freedom of association and the right to collectively bargain in the national language which has been properly understood, understood and implemented.

6.3.2

The certification unit has a list of workers who have joined the labor union and the last update was carried out in January 2023 for Mill and Estate. In addition to properly documenting the list of members, the certification unit also has records of meetings between labor union and Management Representatives as well as with internal union. The following are examples of records of meetings conducted by labor union in 2022/2023, namely:

- Meeting between all PUK SPSI management for the RSSJ Region (South Riau, South Sumatra and Jambi) on June 7 2022 at the BW Luxury Jambi Hotel which discussed bonus SKU workers, employee leave and premium increases in the following year. The meeting was attended by all PUK SPSI representatives at PT Bina Sains Cemerlang, PT Bahari Gembira Ria, PT Bhumireksa Nusasejati and PT Guthrie Pecconina Indonesia.
- Meeting of all PUK SPSI management for the RSSJ Region (Riau Selatan, South Sumatra and Jambi) with company management (PT Bina Sains Cemerlang, PT Bahari Gembira Ria, PT Bhumireksa Nusasejati and PT Guthrie Pecconina Indonesia) on 19 January 2023 which discussed the final meeting drafting and signing of the CLA agreement for the 2023-

2024 period. The meeting was attended by all PUK SPSI representatives and company management, totaling 30 participants.

- Meeting on November 26, 2022, between the workers' union officials and company management representatives discussed employee cooperatives, where the result was that the workers stated that currently workers still don't need an employee cooperative until now.
- Meeting on March 17, 2023, between representatives of the trade unions and company representatives discussed and socialized the newly ratified CLA to all management which was later hoped to be properly conveyed to its members.

Based on the results of interviews with labor union representatives and their members who are workers in each unit, it is known that the union holds meetings every month with those accommodated in Bipartite meetings between worker representatives and management representatives. In discussing meetings between workers' union officials and company management, if there are matters that are not resolved in the discussions, a tripartite settlement will be carried out accompanied by the Manpower and Transmigration Agency.

Based on this explanation, it can be concluded that the certification unit has minutes of meetings between the certification unit and labor unions or workers' representatives who are freely chosen by workers, in the national language and well documented.

6.3.3

Based on the interviews with the labor union representatives, there was no interference in the selection or labor union operational activities. All processes of selection, decision making and planning activities, members' aspirations to their representatives run democratically. The worker who is currently placed as the Chairman of the Labor Union in each unit is a worker at mill and estate, then there will be no conflict of interest that occurs with the company because there were no workers who have the authority as decision-makers (staff class and above).

The establishment of the union was in accordance with the applicable laws and regulations and has been recorded at the Manpower and Transmigration Agency. The unit of certification was giving freedom for workers to express their aspirations and did not give any intervention related to labor union activity. Based on the interview with workers, it is known that there was no mandatory to be a member of labor union. The membership of the labor union is voluntary.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1

Certification unit has a Sime Darby Plantation Code of Business Conduct (COBC) which has been effective since April 2022 for Sime Darby Plantation and all of its subsidiaries. In Point 5.7 in the section "Protecting Children's Rights" the company is committed to supporting children's welfare and protecting them from all forms of inappropriate treatment or exploitation, including sex on children, child trafficking, child labor and child pornography. From this policy, the company has shown its commitment openly (this policy can be accessed online on the Sime Darby Plantation website) and has socialized it to relevant stakeholders (workers, labor unions, surrounding communities to contractors).

Based on the results of the review of the cooperation agreement document with the contractor, it is known that in the agreement has a separate clause to ensure that the contractor does not employ minors (under 18 years old) and complies with the prevailing laws and regulations in Indonesia. Based on this, it can be concluded that the unit of certification has a policy on child protection including the prohibition of child labor and has been well documented and known to all workers.

6.4.2

The results of the verification of employee list in March 2023 revealed that there were no workers under the age of 18. In addition to having a policy governing the minimum age for workers for workers, the certification unit also includes clauses on child protection and prohibitions on hiring workers under the age of 18 in any agreement with the contractor.

Based on field visits and interviews with workers (labor union representative, harvester, pesticide operator, upkeep and mill operators) in plantation and mill, it is known that the minimum age for work is 18 years, and no workers found below the minimum age specified. This is supported by the results of a review of company and contractor workers' documents which proves that there are no workers under the age of 18 at the time of entering work, the youngest age of workers is 22 years when entering work.

Apart from that, in terms of the employment computerized system that is used, it is completely locked to the benchmark age of workers over 18 years. Where when there are new prospective workers who will register under the age of 18, the worker will not be automatically processed, and the data will not be read by the system. Based on this explanation, it can be concluded that the unit of certification has documented evidence regarding the fulfillment of the minimum age requirements for workers in accordance with applicable regulations and age requirement verification procedures.

6.4.3

Based on the results of field visits and interviews with estate and mill workers, it is known that currently the unit of certification is not using young workers (Field Work Practice – *Praktek Kerja Lapangan* / PKL) at the time of the audit activities. Apart from that, the list of workers for the March 2023 period did not find this. Because of this, this indicator is not applicable.

6.4.4

Certification unit has a Sime Darby Plantation Code of Business Conduct (COBC) which has been effective since April 2022 for Sime Darby Plantation and all of its subsidiaries. In Point 5.7 in the section "Protecting Children's Rights" the company is committed to supporting children's welfare and protecting them from all forms of inappropriate treatment or exploitation, including sex on children, child trafficking, child labor and child pornography. From this policy, the company has shown its commitment openly (this policy can be accessed online on the Sime Darby Plantation website) and has socialized it to relevant stakeholders (workers, labor unions, surrounding communities to contractors).

Based on field visits and interviews with workers (union representative, harvester, pesticide operator, upkeep and mill operators) in plantation and mill, it is known that socialization of these policies has been carried out so that workers know that workers underage is prohibited, dangerous and knows the reasons why they must be protected. This has also been conveyed well by contractor workers, contractors and the surrounding village community who were interviewed.

Based on this, it can be concluded that the unit of certification has proven the delivery of a 'no child labor' policy and information regarding the negative impacts of child labor practices, as well as support for child protection to supervisors and other key staff, smallholders, FFB suppliers, and community where workers live.

Status: Comply

6.5

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

6.5.1, 6.5.2 and 6.5.3

Certification unit has a Sime Darby Plantation Code of Business Conduct (COBC) which has been effective since April 2022 for Sime Darby Plantation and all of its subsidiaries. In Point 5.3 regarding Harassment and Violence which explains that the company is committed to prohibiting all acts of harassment and violence that exist within the company's operational environment. This includes, among other things, degrading comments based on gender, characteristics or race or ethnicity, sexual misconduct, spreading malicious rumors, voice messages or communication channels for sending degrading or discriminatory material. This policy can be easily accessed online on the website and the company has routinely disseminated it to stakeholders (workers, labor unions, local communities to contractors) every year.

The management has carried out an assessment of the needs of young mothers by asking for their opinions, as well as taking actions to meet the needs that have been identified, which are shown as follows:

- Assessment for New Mothers, in the certification unit conducted by medical personnel (midwives and nurses)

- Minutes of the Action Plan Meeting on the Needs of New Mothers After Childbirth at certification unit, which among other things explain the following:
 - ❖ Give permission to mothers who breastfeed while working with an adjusted time.
 - ❖ Make a place for breastfeeding in the Daycare ("Ruangan ASI") for female employees and make attendance for every mother who breastfeeds as monitoring by management.
 - ❖ Analyze the needs of mothers and babies such as daily needs (milk, diapers, baby clothes and other equipment) and their availability in the company's operational environment or in their surroundings (there is workers cooperative with easy and close access).

Based on interviews with female workers and gender committee, the policy had disseminated to workers through socialization with workers and in the last year period, which hasn't any issue/incident related to sexual harassment, violence at work/reproductive rights. Based on the field visit to the housing complex show that to accommodate the needs of new mothers in breastfeeding, breastfeeding corners have been provided in the office area and child care area. The availability of daily needs for mothers and their babies is also very easy to access, namely in shops around the company. There are workers cooperative and shops about 15-30 minutes away from workers' housing that provide these needs to access everything.

Based on the explanation above, it can be concluded that the certification unit has policies related to preventing harassment, sexual violence, protection of reproductive rights and identifying the needs of new mothers, all of which have been implemented properly and proven according to the results of field observations and interviews with workers.

6.5.4

The company showed the procedure to accommodate complaints and grievances from employees specifically in sexual harassment and violence showed in socialization to all workers and stakeholders. In the procedure described that if requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).

Based on the interviews with workers and contractor workers, it is known that the workers already have sufficient understanding of the grievance mechanism. Related complaints of sexual harassment can be submitted to the gender committee.

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

6.6

No forms of forced or trafficked labour are used.

6.6.1

Certification unit has a Sime Darby Plantation Code of Business Conduct (COBC) which has been effective since April 2022 for Sime Darby Plantation and all of its subsidiaries. Point 5.7 concerning Human Rights in the section "Eliminating All Forms of Exploitation" explains that the company's commitment to eradicate/eliminate all forms of forced or bonded labor, slavery, human trafficking, and sexual exploitation in all company work operations. Based on the results of interviews with workers, trade unions and gender committees in plantations and factories, there were no issues of coercion, slavery and labor trafficking as well as all forms of exploitation.

There are no migrant workers who work in the company's operational area. All workers come from within one country (although from various regions). In addition, each worker has been provided with a clear work contract. The rights and obligations of workers are also clearly stated in Collective Labor Agreement, and in work agreements. Based on employee list and observation in field known that there are no migrant workers, forced labor. Every worker has a work agreement that describe specific job description, there is no substitution of contract without prior consultation and agreement from the worker, for example:

- There is no retention for identity, because all labor documents for individuals are in the form of photocopies and not original items such as ID cards, diplomas, family cards and others.
- There is no contract substitution, because all existing contract workers currently work in accordance with existing contracts such as contract workers for maintenance activities only doing maintenance activities and do not employ workers other than those stated in the contract.

- The freedom of workers in resigning, because if the worker wants to resign there is no understanding or prohibition from the company to the worker concerned. This is evidenced by the presence of workers who resigned to move to work and the company gave all their rights as fully resigned workers without any shortcomings.
- There is no coercion in doing overtime work, workers who do overtime at the company can refuse if ordered to do overtime activities because overtime is not the worker's obligation, and the company also does not prohibit this.

Based on employee data in March 2023 and interview with workers (mill and estate), most of the workers came from local communities, such as Aceh, Malay, Javanese, and another ethnicity. They have the recruitment process in the certification unit and is in accordance with applicable employee acceptance procedures. Based on the results of interviews with workers in plantation and mill, it is known that currently there are no migrant workers, retention of identity, payment recruitment fees, contract substitution, involuntary overtime, lack of freedom of workers to resign, penalty for termination, debt bondage, and withholding. This is because the certification unit has carried out its operations in accordance with applicable regulations.

There are no significant obstacles related to employment or violations of the Collective Labor Agreement. For example, for the harvesters works daily based in 6 days a week and 40 working hours a week. Certification unit provides output targets that can be obtained in less than 7 hours of work. If the harvester obtains more output within or more than 7 working hours, then the harvester will get the harvest premium payment. No penalty is given to the harvester if it does not get output due to natural factors such as rain. Based on payment list on March 2023, the harvesters have earned in accordance with the minimum wage.

6.6.2

In accordance with the explanation in indicators 6.2.7 and 6.6.1, where it has been explained that currently the unit of certification no longer has workers with daily contract status (BHL) and migrant workers. Based on this, the unit of certification does not own and carry out implementation related to contract workers and migrant workers.

For contract workers (PKWT), currently the company still owns it, and this is only implemented for local workers or temporary/seasonal work. Further explanation regarding this can be seen in indicator 6.2.7. Until the audit activity took place, the recruitment of workers with contract status (PKWT) had been carried out in accordance with statutory provisions, where there was no withholding of important documents, fees were collected, and all rights/obligations of workers and employers had been clearly stated in the work agreement. There were no violations committed by the company in this regard. This is consistent with the results of interviews with union representatives as well as workers who stated that the recruitment system carried out was in accordance with laws and regulations and there was no use of forced or other labor during the recruitment activities.

Status: Comply

6.7

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

6.7.1

The company already has an OHS organizational structure for all of its business units, for example the OHS organizational structure as follows:

- Ratification of LPE OHS Committee according to the Decree of the Manpower and Transmigration Office of Jambi Province number KEP/92/SK/DISNAKERTRANS-3.1/2022 dated January 28, 2022, with the OHS Committee secretary namely Muhammad Roni.
- Ratification of LPF OHS Committee in accordance with the Decree of the Regional Technical Implementation Unit of the Jambi Province Labor Inspection Center number 216 of 2021 on September 27, 2021, with the OHS Committee secretary namely Arpan.

The company has routinely held OHS Monthly Meetings, for example the Minutes of the February 2023 OHS Monthly Meeting which was held on 11 February 2023 which discussed compliance with the use of PPE, maintenance of roads around the Mill and Mill Cleanliness.

6.7.2

The company already has Emergency response procedure number 7309/BGR/ESH/10 dated August 2, 2009, aims to provide guidance in preventing and handling emergencies and their recovery efforts, whether affecting humans, the environment or work activities/processes. The potential emergency for this site is fire issue, and chemical spill.

Based on the results of field visits at Estate, Mill, Housing and Offices it is known that the company already has emergency response equipment such as Fire Extinguisher, Hydrant, First Aid in buildings and in the field (foreman) and firefighting infrastructure.

Based on field visit to the chemical warehouse, Workshop, hazardous waste storage, it was found that there was a first aid kit in the field. Based on interviews with workshop workers and warehouse staff, it was found that they were aware of the use of first aid kits. Furthermore, to field employees it is also equipped with a first aid bag brought by the foreman. Based on interview with the first aid officer it's known that they can explain how to use the first aid equipment.

The company is still consistent in monitoring the recording of occupational accidents by calculating the lost time accident (LTA). Recapitulation of work accidents with a formula to find the level of severity and frequency of accidents. This document informs the time period, the number of working days, the number of no effective working days, overtime, hours of work in total, the number of accidents, the number of working days lost, hours of work a year, the number of accidents a year, lost days a year. Calculation of Severity Rate and Frequency Rate is reviewed regularly, and monitoring will be evaluated at the monthly meeting of Committee of Occupational Health and Safety.

6.7.3

The company has provided PPE in accordance with the results of identification and risk control (HIRAC) set by the company, for example based on the results of field visits at the Boiler station it is known that workers have been equipped with PPE such as masks, gloves, safety shoes and aprons. In addition, companies can show minutes of handing over PPE to workers, for example, handover of PPE and harvesting work tools at LPE in the form of Helmets and Booth shoes on 11 April 2023.

Based on the results of interviews and observations on harvesting activities and warehouse workers it is known that workers have been given the appropriate PPE and are free of charge. In addition, based on field observation in rinse area LPE, it is known that the company has provided sanitation facilities that can be used by workers to clean themselves, change clothes and store work tools.

6.7.4

The company already has a list of employees which also includes *BPJS Ketenagakerjaan* and *Kesehatan* participant numbers for a total of 205 workers (permanent and contract workers). This number does not include the number of workers with staff status and above. Based on a review of the company's employee list documents for March 2023 and proof of payment for *BPJS Ketenagakerjaan* and *Kesehatan* for the same period, it is known that the company has registered and paid all of its employees in the *BPJS Ketenagakerjaan* and *Kesehatan* programs, which consist of Work Accident Insurance (*JKK*), Death Insurance (*JKM*), Old Age Security Insurance (*JHT*) and Pension Guarantee/Insurance (*JP*) via Bank Transfer, with proof of payment as follows:

- Proof of BPJS Health payments for the period of March 2023 for 195 workers (for a difference of 10 workers are workers who still receive BPJS Health from the Government/PBI Participants and do not want to make arrangements to leave PBI Participants so the company cannot register them) PT Bahari Gembira Ria on March 8, 2023, via bank transfer. The invoice given is different for each unit depending on the number of employees, but the process and date for payment are carried out simultaneously.
- Proof of payment for BPJS Employment for the December 2022 period for a total of 205 PT Bahari Gembira Ria workers on March 8, 2023, via bank transfer. The invoice given is different for each unit depending on the number of employees, but the process and date for payment are carried out simultaneously.

Based on the results of interviews with union officials in each unit as well as workers in the plantations (harvester, manurers, and sprayers) and mill (process operators) it is known that the certification unit has provided health insurance to workers and their families (wives and children) and insurance employment for all workers. If there is a work accident that occurs to the worker, this will be taken care of completely free of charge in accordance with the provisions stipulated in the Employment BPJS, and if the worker is disabled as a result of work, he will receive compensation.

Based on the foregoing, it can be concluded that the company already has a list of employees participating in the *BPJS Ketenagakerjaan* and *Kesehatan* program along with proof of payment every month.

6.7.5

The company is still consistent in monitoring the recording of occupational accidents by calculating the lost time accident (LTA). Recapitulation of work accidents with a formula to find the level of severity and frequency of accidents. This document informs the time period, the number of working days, the number of no effective working days, overtime, hours of work in total, the number of accidents, the number of working days lost, hours of work a year, the number of accidents a year, lost days a year. Calculation of Severity Rate and Frequency Rate is reviewed regularly, and monitoring will be evaluated at the monthly meeting of Committee of Occupational Health and Safety.

Based on documents verifications during 2022 in estate number of case of accidents are 3 with total LTA are 21 with total working hours are 583,642 hours. Based on calculations the value of Frequency Rate are 5 and Severity Rate are 36.

Status: Comply

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

7.1

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

7.1.1

The company has shown evidence that pests, diseases, weeds and invasive introduced species are effectively managed using the appropriate Integrated Pest Management (IPM) method. The plan of integrated pest management was arranged in several procedures, such as procedure of detection and early warning system, procedure of integrated pest management (procedure of weed management, as well as procedure of pesticide handling. The procedures set the early warning system by monthly detection of potential pest and diseases (leaf eater caterpillar, rats), emphasizing the mechanical and biological control such are by planting of beneficial plants (*Turnera subulata* and *Antigonon leptosus*), as well as installing and monitoring barn owl boxes to suppress rat infestation. The procedure also set the economical threshold for each pest and disease, that the chemical control will be conducted only if the infestation has been exceeding the economical threshold. In the weed management procedure, the company's policy is to conduct selective weeding, to maintain biological diversity in order to suppress pest and disease infestation.

The company has shown documentation of monthly potential pest and disease detection of each unit that conducted by trained worker. Based on census summary and maps of infestation of January – December 2022, known that there was pest e infestation exceed the economical threshold are *Oryctes* Sp especially in young oil palm tree or replanting area. The company has carried out pest control using a pesticide with the active ingredient Cypermethrin and in addition, control has been carried out using pheromone traps.

7.1.2

Based on document review, the company implement some biological control practices to suppress pest and diseases infestation such as white buttercup flower (*Turnera subulata*) and barn owl (*Tyto alba*). Verification result on website of cabi.org known that those species stated as not invasive in Indonesia.

The company shows the memorandum of Head Plantation Upstream Indonesia dated August 7, 2014, No. M-077/HPUI/VIII/2014 has explained that the company does not burn in any form and must implement zero burning in all Minamas plantation activities.

7.1.3

The company has SOPs related to oil palm cultivation which are contained in the "Reference Procedures for the Agronomy of Oil Palm Planting Manual," or Agricultural Reference Manual (ARM) No. Policy 110/EST-ARM/13 signed by the Head of Plantation Upstream Indonesia on September 16, 2013. The SOPs related to land clearing activities are in Section 4 on Land Preparation which explains that land clearing activities are carried out mechanically without burning.

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 Certification has a list of pesticides that can be used in 2021, consisting of 08 types of pesticides registered in the pesticide commission. These pesticides consist of herbicides, insecticides, and rodenticides. These pesticides consist of groups II and IV. The recommendations for these pesticides have been adjusted according to the type, for example:

- Control of oil palm pests.
- Control of oil palm diseases.
- Weed control.

Based on document review and observation of pesticide storage, Certificate Holder does not use WHO 1A, 1B pesticide or paraquat. Based on documents verifications, field visit to pesticide storage and interview with management and pesticide applicator obtained information if the CH did not used the pesticide that prohibited by the government as mentioned in Annex II Regulation of Ministry of Agriculture No 39 year of 2015 about Pesticide Registration, for example aldrin, formaldehyde, monokrotofos.

7.2.2

The company has procedures related to chemicals such as spray work and pest and disease control. The procedure is contained in the Agricultural Reference Manual (ARM) with document number 110/EST-ARM/13. Section 15 deals with plant protection from pests and diseases consisting of horn beetle control, bagworm, *Setora Sp / Thosea Sp*, rat pest control and Ganoderma control for root rot and stem rot, Section 16 deals with general weed control.

The Company already has a record/realization of the active ingredients used and the targeted area, amount of active ingredients applied per Ha and amount of applications listed in the Record of Pesticide Use Documents on the Applied Area. Based on field visits and interviews with forman pesticide applicator Block 31 clerck pesticide storage it was known records of pesticides use including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications are provided.

7.2.3

The unit of certification implements an integrated pest control system by collaborating biological and chemical control. The use of chemical techniques is not carried out preventively but based on the results of the early warning system, namely detection and census. Biological pest control is carried out by applying the development of natural enemies of owls to control the population of rat pests. The development of useful plants such as *Turnera subulata* and *Antigonon leptopus* is also used as a biological control technique as a habitat for fire caterpillar predators.

7.2.4

The company has carried out the IPM quite effectively, with no use of chemicals for pest control and does not use pesticides as prophylaxis. The pesticide used is routinely for weed control and if the conditions of the circle and path are still quite standard, weed control will be suspended.

The IPM programme listed in Annual Work Plan which is then detailed into a monthly work plan and daily work plan. The IPM program prioritizes routine monitoring of the presence of pests. Pesticides are the last alternative control if indeed the observations show a value above the control threshold. Basically the application of IPM aims to minimize the use of pesticides in pest control. The application of pesticide was based on census and monitoring. There is no prophylaxis pesticide used.

7.2.5

Based on document review and observation of pesticide storage, Certificate Holder has not used WHO 1A, 1B pesticide or paraquat since 2008. Based on documents verifications, field visit to pesticide storage and interview with management and pesticide applicator obtained information if the CH did not used the pesticide that prohibited by the government as mentioned in Annex II Regulation of Ministry of Agriculture No 39 year of 2015 about Pesticide Registration, for example aldrin, formaldehyde, monokrotofos.

7.2.6

The company shows recordings of periodic pesticide handling training, for example the recording of the integrated pest control training on 16 November 2022 which was conducted by the Divisional Assistant and attended by 10 maintenance and chemist workers. The material includes handling if there is poisoning and work obligations that are safe for both themselves and the environment. For example, the obligation to wear PPE and an understanding of areas that should not be sprayed such as riparian. Its has been confirmed during interview with workers where they can explained regarding how to work safely.

The company has provided special mixing tank to bring the pesticide. Beside that, based on document review and pesticide application record, the company also provide clean water, soap and first aid kits to support the sanitation and OHS aspects needed by the spray team.

The company has provided special mixing tank to bring the pesticide. Besides that, based on document review and pesticide application record, the company also provide clean water, soap and first aid kits to support the sanitation and OHS aspects needed by the spray team, furthermore Are all precautions attached to the products properly applied by the unit of certifications. Therefore, based on field observation to mixing area in LPE, that known there are storage for keeping all PPE's and spraying tools after use.

7.2.7

Pesticide Warehouse has been met with the Government Regulation. Based on the results of the field visit at the Pesticide Warehouse, it is known that the pesticide storage area has been equipped with ventilation, adequate lighting, OHS hazard symbols, MSDS and emergency response facilities such as fire extinguishers, first aid kits and showers, In addition, storage has used the appropriate container and based on its type.

7.2.8

The certification unit has a procedure set out in the SOP for Hazardous & Non-Hazardous Waste Management with No. RA 012, dated April 1, 2010, which explains that chemical packaging is included in the category of hazardous waste, but is not considered hazardous waste if properly cleaned. Regarding the procedure below, pesticide packages are collected in the designated storage area and company coordinated with collectors for recycling.

Based on interviews with employees and the foreman of pesticide application at Estate, it was found that all containers used for pesticide packaging were returned and sent to the Hazardous Waste Storage and were not used for any other purpose other than pesticide application activities. All used packaging containers, work tools and aprons are stored in a special storage area. Thus, no contaminated items are taken home.

7.2.9

Based on field observations in Spray Circle & Path, Block 31, it is known if the workers already know the method of selective spraying, for example, only spraying the circle or the existing weeds and if there is no weed, no spraying is carried out. The company also does not apply pesticides by air.

7.2.10

in previous assessment there are opportunity for improvements where the companies are encouraged to carry out special health checks for workers with high risk, especially pesticide operators, while still paying attention to health protocols. The OFI has been follow up by the unit of certifications. The company shows records of special health checks for high-risk workers as follows:

- Spirometry Examination for 57 workers organized by DNA Clinic & Laboratory on December 12, 2022, with all normal conclusions.
- Cholinesterase examination for 56 workers conducted by the DNA Clinic & Laboratory on December 12, 2022, with the conclusion that all were normal.

7.2.11

The certification unit has a Block Spraying System SOP dated March 4, 2009, which explains that pregnant and lactating women are prohibited from carrying out Block Spraying System (BSS) activities. In addition, the certification unit also has a policy that prohibits pregnant and lactating women from working in activities that come into contact with chemicals, this is stated in the BSS procedure and the use of the station No. 066/RSPO-BSSPSS/2011. During the audit activity, certification unit shows a document registering the spray employees in each unit, which is known to consist of male and female spray employees.

The certification unit has a mechanism to identify pregnant and lactating workers which was issued by the unit manager on July 1, 2017, with the following details:

- The employee submits a medical treatment letter to the foreman/foreman 1.
- The letter is brought to the assistant for approval for treatment.
- Employees go to the polyclinic for examination.
- The doctor/nurse makes a pregnancy certificate (if positive).
- Letter is submitted to assistant for approval.
- Assistant makes job transfer/mutation letter from spray job.

Based on the results of interviews with representatives of the Gender Committee and employees, it is stated that female workers who are pregnant or breastfeeding are not allowed to work related to chemicals and will be transferred to other jobs. Pregnancy checks are only carried out on spray and fertilizer workers every month to find out whether workers are pregnant or not. Based on interview with female workers it is known that there are no pregnant workers that handling pesticides. In addition, based on the results of the review of the labor register document, it is known that there are no child laborers employed by the company.

Status: Comply

7.3

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

7.3.1

The company has a waste management plan identified from Estate and Mill activities. The waste management plan is as follows:

Domestic Waste

Domestic waste generated from housing and offices will be disposed of in Landfills. Domestic waste is transported twice a week and then disposed of in landfills.

Mill Effluent

Liquid waste generated from the factory is reused for Land Applications. 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.

Solid Waste

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

Hazardous and Toxic Waste

The company has implemented hazardous and toxic waste management in accordance with the procedures it has, among others by recording and documenting the waste of hazardous and toxic materials stored in the Temporary Storage of Hazardous and Toxic Materials in the logbook and waste balance. Waste Hazardous and toxic materials submitted to the collectors and transporters in the form of manifest evidence of hazardous and toxic materials waste.

7.3.2

The company already has a waste management procedure (solid, liquid and air) which is contained in the document:

- SOP Station Final Effluent dated 7 January 2010, which explained one of the details regarding waste pond treatment, such as paying attention to pond level, multi feeding feed system, and nutritional conditions of sewage pond testing during the sedimentation process.
- SOP for Utilization of Liquid Waste for Fertilizer (Land Application), which describes:
 - ❖ Effluent from pool 1 flows through underflow to pool number 2
 - ❖ System maintenance: responsible for carrying out installation, operational inspection of pumps between waste ponds and from waste ponds to application blocks in coordination with processing assistants and laboratories by placing mechanical and electrical personnel.
- SOP for handling solid waste number 027/PT BGR/2014, no. Revised RSPO/P&C/PLNB-3, dated 1 November 2014. In this procedure, there is a flowchart for the utilization of fiber and shells as boiler fuel, empty fruit bunches as fertilizer and boiler ash used for road repairs.
- SOP for Waste Management dated March 28, 2019, it is known that domestic waste generated from housing and offices will be disposed of in landfills. Based on the memorandum of the Head Plantation Upstream Indonesia on August 7, 2014, concerning Guidelines for Fire Prevention and Management number M-077/HPUI/VIII/2014 conveying a zero-burning policy, and a ban on burning waste. Based on the PRQM Head in Charge memorandum No.009/PSQM-UM/X/2011 concerning Housing Fire Prevention and Management, stated that it is prohibited to destroy domestic waste or household waste by burning it.

Based on the results of field visits in the company's operational areas, it is known that there is waste management that is not in accordance with the procedures that are owned, among other things:

1. IPAL

- There is an overflow in pond number 1, where sewage overflows from the pond and pollutes the environment.
- There are damaged tools that are abandoned in pools number 2, 3 and 4, namely agitators and mixers.
- There was a fallen tree around pool number 1, which broke the pond embankment and liquid waste overflowed from the pool.
- Pool number 3 has experienced siltation, and is already hard and has a lot of overgrown grass (not functioning properly).

2. Empty Bunch Area

- There is no evidence yet that the leachate produced does not pollute the environmental area.
- It has not been shown the drainage of the leachate produced.

3. Factory Area

- There are piles of scrap iron that are located in an inappropriate place around the empty stack area, and are not given a safety line.
- Cannot be shown the estuary of the PKS drainage.

4. Housing Complex

- In the Landfill area, waste is not disposed of in the sinkhole but is left scattered around the TPA.
- Burnt trash was found at 5 different points in the Ladang Panjang Estate Division III housing complex.

The company has not been able to ensure that waste disposal is in accordance with procedures and is understood by all workers and managers. Based on explanation above raised Non Conformity No 2023.02 With Minor Category.

7.3.3

The company does not carry out open burning for waste disposal. Base on field observation known waste separation is separated based on the type of wet and dry waste, garbage transportation is carried out routinely, waste separation organic and inorganic are adjusted to the appropriate tub then put into the final waste disposal and closed periodically. Based on the results of field visits, both on land and in housing, there was no indication of open burning of hazardous and toxic waste or domestic waste.

7.3.2

Status: Non Conformity No 2023.02 With Minor Category

7.4

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

7.4.1

The unit certification has procedures related to fertilization activities that are listed in the Agricultural Reference Manual with document number 110/EST-ARM/13. The procedure explains the technical aspects of fertilization, the application of empty lengths and the application of compost to immature and mature plants. Further explained related to the placement of fertilizers and the application of fertilizer by focal feeding in marginal land.

Based on documents verification, the management unit performed fertilization by using chemical fertilizers, effluent and EFB. Record of fertilizer application included EFB mulching, and land application were available. This is indicated management strategy towards soil fertility improvement were satisfactory monitored. Implementation of procedures is monitored regularly with operational audits or plantation advisories.

7.4.2

The management unit routinely has conducted soil and leaf analysis periodically. The following analysis which has been conducted as follows:

- (Soil Analysis, which is done regularly every 5 years measuring the following parameters: texture, acidity (pH), contents of N Total, P-Total, K, Ca, Mg, B, Cu, Zn.
- Leaf Analysis, which is done annually as a guide to determine the fertilizing recommendation, by monitoring the following parameters: Indicator Major elements namely N, P, K, Mg and Ca and Indicator Minor elements namely B, Cu and Zn.
- Visual Analysis, which is done as part of the points in determining the fertilizing recommendation, identifying nutrient deficiency symptoms, and analyzing the disease attacks that are potential in becoming an endemic of certain disease.

Based on the Minamas Agricultural Reference Manual for Palm Oil Planting Section 8 Fertilization Point 3.1.1, it is stated that the dose of fertilizer for mature plants above 24 months will be given by an agronomist based on the interpretation of the results of leaf analysis by entering several data such as production, rainfall, soil type and make observations during field visits.

The company shows the results of leaf analysis conducted by Minamas Research Center number P105/2021 on September 9, 2021. The parameters analyzed include ASH; P; K; Mg; Ca; N; B; Fe; Cu and Zn. Based on the recommendation document the company has considered the land suitability that contained in Semi Detail Land Suitability Survey and the results of leaf analysis.

7.4.3

The company shows records of nutrient recycling, including:

- EFB applications for the period January – December 2022 covering 17,816 MT with Dose 40 MT / Ha.

- POME applications fo.
- Based on the results of the field visit, it is known that the company also uses pruned midrib as an alternative nutrient source.

7.4.4

Companies can show the realization of fertilization in January 2023, which is carried out in accordance with fertilizer recommendations, for example the realization of MOP fertilization with dosage 1.5 kg/ palm tree.

Status: Comply

7.5

Practices minimize and control erosion and degradation of soils.

7.5.1

Information about the condition of the land at PT BGR is listed in the land survey document conducted by Minamas Research Center for the period 2015-2020 in which there is a map of soil types with a scale of 1: 45,000 which explains that there are 2 types of soil in PT. BGR namely peat (Typic Haplofibrist and typic Haplosaprist) and mineral soil (Aquic paleudult, Typic Paleudult, Typic Dystrudept).

Based on the analysis of the land map, the information is about 67.94% of the total area of the Ladang Panjang Estate classified as flat (0-4%) while the rest is corrugated (4-12%). Based on field visits, there were no fragile and other marginal lands in the operational area of PT BGR division 3.

7.5.2

Based on the results of the review of the replanting plan document, it is known that currently the company has not carried out any replanting activities.

7.5.3

Based on the results of the study of the area statement document, it is known that the planting year was between 1997 – 2001, and currently the company does not carry out any new planting activities.

Status: Comply

7.6

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

7.6.1

Based on the results of the study of the Semi Detailed Soil Survey and Land Suitability for Oil Palm Plants at PT Bahari Gembira Ria 2015 – 2020 document, it is known that the potential land suitability in Division III LPE includes S2 (suitable) and S3 (Moderately Suitable).

7.6.2 and 7.6.3

Based on the results of the study of the area statement documents and field visits, it was found that the company did not carry out any new plantation development activities, the planting year was between 1997 – 2001.

Status: Comply

7.7

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

7.7.1 – 7.7.7

Based on the results of the 2015-2020 Semi Detailed Soil Survey and Feasibility Study conducted by the Minamas Research Center, it is known that there is a type of *Typic Haplosaprist* peat soil covering an area of 66 Ha with a thickness of <100 cm. Based on the results of field observations, it is known that the area is a low-lying area, not traversed by rivers and is of mature peat type, so that its management is the same as mineral soil. So, it can be concluded that there is no type of peat soil in the company area, so this indicator is not relevant.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The company has implemented a water management plan consisting of:

- Do not apply chemicals in river border areas.
- Do not dispose of POME into the river but reuse it on plantation land. Before being used, POME is first managed in the WWTP so that its quality meets the standards set by the government.
- Utilizing water for factory processing in accordance with the standards set by the company.
- Conduct river water quality testing.

Based on field observations of the Terentang River border area, which is HCV in Block C029, it can be seen that the company has carried out management of the river border by placing a signboard as an HCV area and painting the palm trees as a spray boundary mark.

The company has a surface water quality monitoring program that is conducted every semester by an accredited laboratory of KAN (LP-412-IDN) on August 3, 2021. The monitoring location is on a river for the scope of the company's operational areas, namely the Terentang Hulu and Hilir Rivers. Currently the company is testing surface water using quality standards that refer to PP RI No. 22 of 2021 Class III. The results of the test will then be reported to the relevant Office through the RKL-RPL Report every semester.

7.8.2

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

- Do not apply chemicals in river border areas.
- Not disposing of liquid waste into the river but reusing it to plantation land. Before being used, the liquid waste must be managed at WWTP so that the quality meets the standards set by the government.
- Utilizing water for factory processing in accordance with the standards set by the company.
- Conduct testing of river water quality and monitoring wells.

Wet streams in the company area are protected by the company. This is evidenced by the results of field observations at the Terentang River border in Block C029. It is known that the river border is protected by the company. Some of the activities carried out by the company are placing red signs as limits for chemical application and planting Pulau, Bamboo and Angsana types of plants. In addition, there are no traces of chemical application on the river border.

7.8.3

The company obtained a Technical Approval for the Utilization of Wastewater for Land Applications from the Muaro Jambi District Environmental Office with Number 660/01/LA/DLH on September 30, 2021. This approval is based on Letter Number 180/BGR/UM/PSD/VII/2021 dated 29 July 2021 from PT Bahari Gembira Ria regarding the Application for Technical Approval. The locations for the utilization of liquid waste for land applications are in Block C027 with an area of 61.91 Ha and Block C028 with an area of 51.28 Ha.

Based on the results of field observations in the Land Application area, it is known that the location of the liquid waste application on the land is in accordance with the location stated on the Land Application permit, besides that there is no indication of overflow of liquid waste flowing. Based on the results of interviews with LA officers, it is known that the officers have understood their duties and responsibilities well and have used PPE that has been adjusted to identify the type of work carried out and provided by the company. The worker informs that there is a routine maintenance schedule for the rorak contained in the application land.

The company can show a POME quality measurement result document that is applied to the land, namely the POME test result document for the period January – March 2023. The test is carried out by a KAN accredited laboratory (LP-1194-IDN) using quality standards that refer to the Minister of Environment Decree No. 28 of 2003 Based on the results of the analysis of the test

document, it shows that all the parameters tested are in accordance with the applicable quality standards. For example, the test results in the period January 2023 with the results of BOD 1279 (BM: <5,000).

Based on the results of field observations in the Land Application Block C028 area, it is known that the location of the POME application on the land is in accordance with the location stated in the Land Application permit, besides that there is no indication of the overflow of POME being channeled.

7.8.4

The procedure of water use monitoring in mill is available under document Procedure of Water Treatment Plant. Water consumption monitored by using flowmeters installed in the piping system of WTP. According to water use data in last period January to December 2022 average of water use for processing still below the determined budget (1.10 m³/ton FFB while budget is 1.20 m³/ton). Overall use of water under the budget of company.

Status: Comply

7.9

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

7.9.1

The plan to increase the efficiency of the use of fossil fuels and optimize the use of renewable energy by the company is to use shells and fiber as boiler fuel which is used to generate turbines to generate electricity. The use of energy generated from the turbine is monitored every day.

The company also has made efforts to improve the efficiency of the use of fossil fuels in the transportation area (use of vehicles), including by periodic maintenance to reduce incomplete combustion and analyze fuel usage by selection of efficient transportation route.

The unit certification already maximizes the use of renewable energy (fiber & shell) as boiler fuel. For example, use of shells and fiber period January to December 2022 POM has produced 1,283,156 kWh of electricity from turbine. Renewable energy use per ton of palm product in the mill is 10.52 kwh / ton CPO. Result Direct fossil fuel used is 0.10 kWh/ ton CPO.

Status: Comply

7.10

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

7.10.1

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

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

The company also has conducted GHG emission calculations period 2021 using Calculator Palm GHG version 4.0. Accurate data has been put into the RSPO PalmGHG Calculator (Palm GHG version 4.0) and has been verified. Summary of net GHG emissions from PalmGHG calculator of the audit report which calculation option is applied "Apply full Version."

Summary of Net GHG Emissions

Emission per product	tCO ₂ e/tProduct
CPO	5.82
PK	5.82

Description	Unit	Value
Oil palm planted on mineral soil	Ha	1157.41
Oil palm planted area on peat	Ha	1651.56
Total oil palm planted area	Ha	2808.97
Conservation area (Forested)	Ha	4.31
Conservation area (Non-Forested)	Ha	0.00
FFB Production per hectare	t/ha	31.26
OER	%	22.09
KER	%	4.70

Summary of field emission and Sinks

Description	tCO ₂	tCO ₂ e/t FFB
Emission Sources		
POME	17210.17	0.20
Fuel Consumption	700.23	0.01
Grid Electricity Utilisation	0.00	0.00
Credits		
Export of Excess Electricity to Housing & Grid	-394.38	0.00
Sale of PKS	0.00	0.00
Sale of EFB	0.00	0.00
Total	17516.02	0.20

Summary Oil Mill Emissions and Credits

	Own			Group			3rd Party				
Description	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e/t FFB	Total	
Emission Source											
Land Conversion	27743.15	9.88	0.65	0.00	0.00	0.00	0.00	0.00	0.00	27743.15	
CO2 Emissions from Fertiliser	4782.92	1.70	0.11	0.00	0.00	0.00	0.00	0.00	0.00	4782.92	
N2O Emissions from Peat	12363.18	4.40	0.29	0.00	0.00	0.00	0.00	0.00	0.00	12363.18	
N2O Emissions from Fertiliser	3080.25	1.10	0.07	0.00	0.00	0.00	0.00	0.00	0.00	3080.25	
Fuel Consumption	636.01	0.23	0.01	0.00	0.00	0.00	0.00	0.00	0.00	636.01	
Peat Oxidation	90175.20	32.10	2.10	0.00	0.00	0.00	0.00	0.00	0.00	90175.20	
Sinks											
Crop Sequestration	-24803.15	-8.83	-0.58	0.00	0.00	0.00	0.00	0.00	0.00	-24803.15	
Sequestration in Conservation Area	-39.52	-0.01	-0.00	0.00	0.00	0.00	0.00	0.00	0.00	-39.52	
Total	113938.05	40.56	2.65	0.00	0.00	0.00	5474.99	0.00	0.00	119413.05	

The audit team has verified the GHG palm that has been carried out by the company. Based on the verification results, it is known that the GHG palm input data is in accordance with the actual conditions. This is evidenced by the results of verification of the amount of FFB production.

7.10.2

The results of document review and interviews with company management revealed that in assessment the company did not develop new plantations after 2014. For the own estate, the last planting was in 2001.

7.10.3

Based on document review and interviews with company representatives, it was found that there was no other new land development. The company has identified sources of pollution in the mills and estates, the documents inform the sources (stations/activities), sources of pollution and emissions, impacts (humans, work equipment, environment) and impact control. For example, from the boiler it produces boiler ash, steam and chemical pollution, from the engine room it produces pollution in the form of noise.

Efforts to reduce pollutants carried out by the company include:

- Monitoring air quality and emissions from boilers and generators.
- Managing POME in the WWTP before it is used in plantations.
- Perform regular machine maintenance.
- Optimizing the use of fertilizers according to recommendations
- Use of fiber and shells in Mill to reduce diesel fuel.

Status: Comply

7.11

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

7.11.1

Based on the results of document verification and field visits during the audit activity, it was found that the company did not carry out new plantings or carry out replanting activities. The company has a SOP for land preparation No. 110/EST-ARM/13 which explains that land clearing is guided by the Decree of the Director General of Plantation dated May 30, 1995, namely land preparation without burning.

7.11.2

The company always monitors fires every month with patrols by supervision and security personnel. Monitoring is carried out at several fire-prone points, such as land adjacent to community gardens and directly adjacent to residential areas. In addition, monitoring is also carried out in each fire tower to monitor hotspots outside the monitoring points. The results of the monitoring are then reported to the supervisor in each estate in the land fire monitoring book.

The auditor team has also conducted fire control simulations for the fire task force team at the Ladang Panjang Estate and tested the company's fire control facilities and infrastructure. The simulation results show that the Company's fire task force team can run the simulation well and the fire control equipment owned by the company is functioning properly and can be used at any time.

7.11.3

The company has also involved stakeholders in adjoining locations for fire prevention and control measures by conducting socialization of land fire control to the public, for example on January 14, 2021, which was attended by 21 participants communities. The results of interviews with representatives of the village community around the company such as Sungai Gelam Village. revealed that the company had socialized fire control to the community. In addition, in the company area there is also a signboard prohibiting land burning activities and the dangers of land fires.

The company has also involved stakeholders in adjoining locations for fire prevention and control by conducting socialization on land fire control to the community, for example on January 14 2021 which was attended by 21 participants. The company also conducted PT BGR Karhutla Management Socialization and Training with the Community on December 22, 2023.

The results of interviews with community representatives from Trimulya Village and Ladang Panjang Village around the company revealed that the company had socialized fire control to the community. Apart from that, in the company area there is also a signboard prohibiting land burning activities and the danger of land fires.

Status: Comply

7.12

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

7.12.1

The company does not develop new land after 2005. Based on the results of document verification, it is known that the last planting carried out by the company was in 2001. The company can show the document LUCA Review Sime Darby Plantation, Minamas Plantation – PT Bahari Gembira Ria. Based on the document, it is known that the Company does not have an area with conservation liability, namely 0 Ha and Environmental remediation 0 Ha and LUCA with PASS status. The company can also show an email from the RSPO (khing.suli@rspo.org) on January 18, 2021, stating that the LUCA review report for PT Bahari Gembira Ria with the status "Pass" with a summary of FCL 0 Ha and Environmental remediation 0 Ha and Therefore, the RaCP for PT Bahari Gembira Ria is now completed.

7.12.2

The company has conducted an HCV assessment in the PT BGR Management unit which was carried out in an area of 1,202.04 ha and 3 villages namely Petaling Jaya Village, Sumber Agung Village and Sungai Gelam Village, Kumpeh Ulu District, Kab. Muaro Jambi with activity dates 13 Nov 2009 – 19 Nov 2009. CV Pollito identified HCV with Team Leaders: Sanusi Wiriadisatra (Team Leader), Ainur Rahman (conservation/fauna team member), Lesmana Wijaya (GIS Team), M. Nursyid (social team).

Based on the results of the HCV identification, it was found that the HCVs consisted of:

HCV	Area (ha) based on HCV status		Location/Description
	HCV Actual	HCV Potential	
1.1	1.5	11	Total area of the Terentang River border area ± 12.5 ha (actual HCV 1.5 ha and potential HCV 11 ha)
1.2	-	9,5	Buffer zone and corridor in block 31/34 and block 41
1.3	-	9,5	Buffer zone and corridor in block 31/34 and block 41
4.1	1.5	11	Total area of the Terentang River border area ± 12.5 ha (actual HCV 1.5 ha and potential HCV 11 ha)
5	1.5	11	Total area of the Terentang River border area ± 12.5 ha (actual HCV 1.5 ha and potential HCV 11 ha)
6	-	-	-

The company conducted an evaluation in 2016 of the results of HCV identification and the company determined the actual HCV area in Division 3 (Scope of certification) was 4.31 Ha.

Based on the document review, it is known that PT Bahari Gembira Ria is not required to conduct an HCS study because there is no new land development after November 2018.

7.12.3

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

7.12.4

The unit of certification has carried out activities in order to maintain protected areas and High Conservation Values that has been stated in the 2021-2026 HCV Management Plan document with management scope and targets update every year which implemented in line according with the HCV management and monitoring plan period 2023 also reviewed periodically every year involved consultation with relevant stakeholders such as villagers around.

The company also has an HCV management plan document for the 2023 period in accordance with the results of the review in 2022. The following HCV area management programs are listed, including:

- Outreach to the community and workers regarding the understanding of HCVs and protected animals.
- Monitoring of animals and flora, including RTE species.
- Maintenance and inventory of installed HCV sign boards, as well as warnings against hunting of wild animals in river riparian areas and conducting land clearing activities.
- Enrichment of forest plants with species capable of reducing the rate of erosion, water storage, and sources of animal feed.
- Marking the spray boundary area.
- Boundary marking on forested areas.
- Checking and maintenance of limits.

The company has also conducted a management review of High Conservation Value Areas which was carried out on January 14, 2022. This activity was carried out to analyze the opportunities and challenges of the identified potential HCVs in the hope that they will become input for the next HCV management plan. These activities are carried out by involving stakeholders such as the surrounding village community and employees.

7.12.5

Based on the results of the document review and field verification, it is known that there are no HCV areas that overlap with the interests or rights of the community within the unit of certification's HCV areas.

However, the company continues to pursue an approach to protect HCV areas in a way that also protects the rights and livelihoods of local communities. Among them by conducting socialization about HCV periodically to find out the extent of community understanding of the existence of HCV and installing sign boards as an indirect socialization effort in areas that are often passed by the community.

7.12.6

The Unit of Certification already has a Biodiversity conservation procedure that has not changed from the previous assessment contained in the SOP for Handling Wildlife Documents dated 1 December 2010.

The SOP has also explained a number of things, including:

- Carry out preventive measures in terms of socialization programs, namely the prohibition of catching, keeping or killing animals that are protected by state regulations.
- Carry out identification/census of wild animals in the plantation area both on land and in water areas as well as making an inventory list of the existence of protected wild animals so that conservation measures can be determined.
- Company employees and contractors are not allowed to trade wild animals, whether protected or not. If it is proven that there is involvement in trading the wild animals in question, severe sanctions will be imposed, including dismissal or cancellation of the contract.
- Carry out a confiscation program that applies in all company areas, including in employee housing, where wild animals are conditioned as having been caught by unscrupulous employees and their family members.
- For animal species that are not protected and need to be controlled, for example pigs or rats, the Estate Manager must be informed beforehand before any control activities are carried out.
- Carry out a census of the existence of flora and fauna.

Based on observations at the Ladang Panjang Estate and Mill housing estates, it was found that there were no employees who hurt, captured, or killed endangered species, and forest encroachment. This is supported by the results of interviews with Harvest and Spray workers at the Ladang Panjang Estate who stated that the company forbade workers to maintain protected animals and plants and was prohibited from catching, hunting, and killing animals.

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 existence of flora and fauna in the company area. The village community understands that the company protects the HCV area and its flora & fauna already know about the protected fauna species, the prohibition to hunt, cut down and burn the forest. Respondents added that apart from 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 the socialization and is known by the surrounding community.

7.12.7

The unit of certification has conducted annual monitoring and evaluation for the management of HCV areas where this activity aims to identify risks, impacts on conservation areas, and improve protection efforts.

The company also has an HCV management plan document for the 2023 period in accordance with the results of the review in 2022. The following HCV area management programs are listed, including:

- HCV Patrol Report for the 2022 period to ensure the Signboard and condition of HCV areas against poaching and illegal logging.
- Outreach to workers and the community regarding HCV and Wildlife
- Monitoring of HCV attributes every 3 months.
- Report on flora and fauna monitoring conducted every 6 months.
- Monitoring Tree Planting in HCV Areas in 2022.

The company has shown evidence that HCV area management has been carried out quite well, the results of field visits to several HCV area locations show that HCV is in a stable condition. No destruction of HCV or entanglement of animals was found. The results of interviews with employees in the field conveyed that employee had received socialization regarding the prohibition of hunting and spraying in the riparian area.

Based on previous Assessment, on RC-2 it is known that PT BGR has socialized the existence of RTE species to employees and the public as an effort to provide education to workers and public about HCV's biodiversity around company's operational area. PT BGR also, known conducted monthly biodiversity monitoring as part of its HCV management and monitoring plan, where can conclude information that there were several species that are include in RTE Species list found during monitoring periode of January 2022 such as *Beruk (Macaca nemestrina)*, *Raja Udang (Alcedo atthis)*, *Burung Daun (Chloropsis synapogon)*, *Burung Perhutut (Geopelia Striata)*, *Gagak Hitam (Corvus enca)*, dan *Biawak (Varanus sp)*. However, the report does not include the status of animal protection found according to PermenLHK Number 106 of 2018. Therefore, this has become OFI on previous assesment, that the company are suggested to ensure the status of animal and plant protection as a result of biodiversity monitoring carried out based on the Minister of Environment and Forestry Regulation Number 106 of 2018. On this latest Assesment, ASA-2.1 Assesment on April 2023, it is known that reporting of RTE species that were found during monitoring of Company's HCV area, it is known already been updated accordance to the status of animal and plant protection carried out by the Minister of Environment and Forestry Regulation Number 106 of year 2018. Therefore, it can conclude that company has been doing improvement from the last assesment.

The results of HCV monitoring in 2022 are carried out in accordance with the master plan and annual planning evaluated by management and involving relevant stakeholders.

7.12.8

The company does not develop new land. Based on the results of document verification, it is known that the last planting carried out by the company was in 2001. The company can show the document LUCA Review Sime Darby Plantation, Minamas Plantation – PT Bahari Gembira Ria. Based on the document, it is known that the Company does not have an area with conservation liability, namely 0 Ha and Environmental remediation 0 Ha and LUCA with PASS/PASS status. The company can also show an email from the RSPO (khing.suli@rspo.org) on January 18, 2021, stating that the LUCA review report for PT Bahari Gembira Ria with the status "Pass" with a summary of FCL 0 Ha and Environmental remediation 0 Ha and Therefore, the RaCP for PT Bahari Gembira Ria is now completed.

Status: Comply

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 2.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product).	✓
	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 2.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product).	✓
	Status: Comply	
3.	Implementation of Certificate and Logo is not used on product	X or ✓
ASA 2.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product).	✓
	Status: Comply	
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or ✓
ASA 2.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product).	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification

Compliance of the uncertified management units of Sime Darby Plantation Berhad against the rules for partial certification was determined through Self-Assessment in accordance with RSPO Certification System clause 4.2.4. A summary of findings is as stated below.

Sime Darby Plantation Berhad Time Bound Plan is explained in table section 1.10. Sime Darby has achieved 34 management units in Malaysia and 24 Management Units in Indonesia that RSPO certified. Total management unit in Sime Darby Plantation Berhad are 34 in Malaysia, 25 in Indonesia and 1 in Liberia. Sime Darby Plantation Berhad has informed the Time Bound Plan progress through representative's office in Indonesia. MUTU has considered that Sime Darby Plantation Berhad is comply with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by the Sime Darby Plantation Berhad Indonesian representative on January 2022 by the Head of Sustainability & Quality Management.

MUTU has verified partial certification for un-certified unit's subsidiary of Sime Darby Plantation Berhad based on their Time Bound Plan. 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:

- PT Budidaya Agro Lestari waiting for land title process to some of its operational area.
- PT Guthrie Pecconina Indonesia – Sungai Jernih Estate currently is in HGU process.
- The company has followed RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There are no labor disputes that are not being resolved through an agreed process.
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above.

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company Group/Holding Statement: The sustainability unit has conducted the internal audit for 9 units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. Other than that, land conflicts and land disputes also being audited and approved by Head of Sustainability-Indonesia.</p> <p>Auditor Verification: Internal Audit report available for uncertified management unit.</p>
2.1.2	No replacement after dates defined in NIs Criterion 7.3 of: <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>Company Group/Holding Statement: No replacement of primary forest or HCV or no new planting after Jan 1st 2010 for all uncertified units except for PT Sime Indo Agro, Bukit Ajong Mill East* Estate /Sei Mawang Estate which is currently under RaCP. LUCA submitted and currently under review process by appointed reviewer by RSPO.</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Auditor Verification: Sime Darby Plantation Berhad sent disclosure of liability including LUCA analysis to RSPO Secretariat on 2 December 2014 and 2nd revision on 24 June 2016. Current status of LUCA report of SDP Bhd is having been sent the 19 reports of LUCA to RSPO on Aug 2018, responded by RSPO with need clarification. The companies ensuring reporting of disclosure of liability progress to RSPO and according to the CB's correspondence with RSPO Remediation and Compensation.</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: No new plantings. As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI).</p> <p>Auditor Verification: Karya Palma Estate (PT Sandika Natapalma) and Beturus Estate (PT Budidaya Agro Lestari) any new planting after January 1st 2010 and due to not conduct NPP it will be object of sanction.</p>
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>Company Group/Holding Statement: The group has land conflict procedure in place. No Land conflict registered with RSPO Complaints System. No outstanding complaints with the RSPO.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement and there is no conflict in uncertified area.</p>
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Company Group/Holding Statement: No stakeholder comments or complaints received.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are no labour dispute in company unit.</p>
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Company Group/Holding Statement: None noted. No stakeholder comments or complaints received.</p> <p>Auditor Verification:</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Auditor has verified the supporting evidence of above the company statement. There is any legal non-compliance for company under SDP waiting for land title process, i.e.:</p> <ul style="list-style-type: none"> • PT Sime Indo Agro 5,815 Ha • PT Bina Sains Cemerlang 308.25 Ha • PT Bahari Gembira Ria 1,639 Ha • PT Guthrie Pecconina Indonesia 890 Ha

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

3.4.1. Identification of Findings, Corrective Actions and Observations at Recertification

NCR No.	: 2022.01	Issued by	: Hasiholan Sihombing
Date Issued	: 9 April 2022	Time Limit	: Next Surveillance
NC Grade	: Minor	Date of Closing	: 20 January 2023
Standard Ref. & Requirement	2.2.2 All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party		
Evidence observed (filled by auditor):			
<ul style="list-style-type: none">Government Regulation no. 35 of 2021 concerning Work Agreements for Certain Time, Outsourcing, Working Time and Rest Time, and Termination of Employment, Chapter III Outsourcing Article 18, among others:<ul style="list-style-type: none">(1) The Employment Relationship between the Outsourcing Company and the employed Worker/Laborer is based on PKWT or PKWTT.(2) PKWT or PKWTT as referred to in paragraph (1) must be made in writing.Regulation of the Minister of Manpower and Transmigration No. 8 of 2010 concerning Personal Protective Equipment, article 2 includes:<ul style="list-style-type: none">(1) Employers are required to provide PPE for workers/laborers in the workplace(2) PPE as referred to in paragraph (1) must comply with the Indonesian National Standard (SNI) or applicable standards(3) PPE as referred to in paragraph (1) must be provided by the entrepreneur free of charge.Law no. 24 of 2011 concerning Social Security Administering Bodies, article 15 paragraph 1 which reads "Employers are obliged to gradually register themselves and their Employees as Participants to BPJS in accordance with the Social Security program being followed"Based on document verification, it is known that the company uses an outsourcing company on behalf of CV Arta Citra Lestari for Pruning, Loading FFB and Harvesting. With the respective contract numbers 09/BGR-LPE/SPK/XII/2021, 10/BGR-LPE/SPK/XII/2021 and 11/BGR-LPE/SPK/XII/2021.From the results of interviews with 4 (four) outsourced workers in the FFB Loading and Harvesting activities, it is known that these workers do not have a working relationship contract with the outsourcing company but only based on an agreement through verbal communication. In addition, workers carry out work using PPE (shoes) that are provided themselves and workers have not registered as BPJS participants, both BPJS Manpower and BPJS Health.Then from the results of document verification, no proof of an employment relationship contract between the outsourcing company and its workers has been shown and also evidence that the workers from the outsourcing company have been registered with BPJS Employment and Health.			
Non-Conformance Description (filled by auditor):			
Based on this evidence, no evidence has been shown that the third party cooperating with the company has fulfilled the applicable legal obligations.			
Root Cause Analysis (filled by organization audited):			
The outsourcing company on behalf of CV Arta Citra Lestari who cooperates with the company has not fulfilled the applicable legal obligations, such as:			
<ul style="list-style-type: none">There is no employment relationship between the outsourced company and the employed worker/laborer, made in writing based on PKWT or PKWTT.Have not provided PPE to employed workers.Have not registered their workers as participants with the BPJS in accordance with the Social Security program that they are participating in.			
The above is because the outsourcing company has just been formed and the high turnover of workers at CV. Arta Citra Lestari.			

Correction (filled by organization audited): <ul style="list-style-type: none"> A work agreement is drawn up between the contractor CV Arta Citra Lestari and the workers and reported to the Manpower Office to be disabled by the service (SPK and proof of reporting to the Manpower Office are attached). Providing PPE to outsourced company workers CV Arta Citra Lestari by the contractor (proof of PPE handover attached). 3. Registering workers in stages in the BPJS Employment and Health BPJS programs (Proof of the list of contractor workers in the BPJS program is attached). 	
Corrective Action (filled by organization audited): Monitoring and evaluation of the fulfillment of legal requirements by the management unit on the compliance of the outsourced company in cooperation with the company (monitoring and evaluation report is attached).	
Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification January 20, 2023 The company has sent proof of improvement in the form of: <ol style="list-style-type: none"> Recording of Contract Labor Reports to the Manpower and Transmigration Office of Muaro Jambi Regency on January 17 2023 for 11 workers. Work Agreement between CV Arta Citra Lestari and 11 workers with numbers 01/ACL/1/2023 to 11/ACL/1/2023 with a validity period from 01 January 2023 to 31 January 2023. Minutes of Handover of PPE for CV Arta Citra Lestari employees on 14 October 2022 in the form of PPE Helmets and Shoes. Evidence of a list of contractor workers in the Employment BPJS program of 5 workers. Based on the proof of improvement sent by the company above, the non-compliance with this indicator is declared Fulfilled and its application will be observed again in the next assessment.	
Verified by	: Hasiholan Sihombing

NCR No.	:	2022.02	Issued by	:	Rahmat Abdiansyah
Date Issued	:	9 April 2022	Time Limit	:	8 July 2022
NC Grade	:	Major	Date of Closing	:	6 May 2022
Standard Ref. & Requirement	:	3.4.3 The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.			
Evidence observed (filled by auditor):					
<ul style="list-style-type: none">• The company has a social impact management plan for 2021, namely:<ul style="list-style-type: none">- Improvement of Village access road- Training/Socialization regarding land fire handling- School children transportation assistance- Assistance with teacher fees- Health services- Sacrificial animal assistance- Providing scholarship opportunities for children- Flatbed Land Application Improvements- River water monitoring- Community water monitoring- Liquid waste management- Air pollution management- Hazardous waste management- Non Hazardous waste management- HCV management- Land fire management					

- The company can also show the social impact management plan for the 2022 period where the plan is exactly the same as the 2021 social impact management plan.
- The company can show evidence that the review of the 2021 social impact management and monitoring plan has been carried out in a participatory manner by providing questionnaires to the people of Sumber Agung and Gambut Jaya villages. However, this review has not been carried out to other villages around the company such as Ladang Panjang Village, Trimulya Jaya, Petaling Jaya and Plasma Farmers. In addition, the review has not yet been carried out to the Company's Internal Stakeholders, namely Company Employees.
- Based on interviews with representatives of the Plasma Marga Jaya Cooperative in Petaling Jaya Village, it is known that there are issues such as the FFB Grading which is considered too high by the Cooperative. However, the grading issue has not been covered in the social impact management plan for 2021 or 2022.
- Based on document verification, it is known that issues from company employees such as wholesale harvest workers and FFB transporters who are still not registered with the BPJS program and the issue of the absence of employee cooperatives. However, these issues have not been covered in the social impact management and monitoring plan for 2021 or 2022.
- Based on the results of interviews with community leaders in Ladang Panjang Village whose land was compensated by the company, it is known that currently there is an activity of taking the company's land by *Suku Anak Dalam* / other parties caused by land boundary disputes between Jambi Province and South Sumatra Province. The community leader asked the company to solve this problem because if it is not resolved, it is feared that there will be social jealousy from the people of Ladang Panjang Village to participate in land grabbing. However, the issue of land grabbing has not been covered in the company's social impact management and monitoring plan.
- Based on the results of interviews with the Village Head of Ladang Panjang, information was also obtained that there is a land boundary problem between Jambi Province and South Sumatra Province and this has been used by other parties to grab / claim land that is included in PT BGR's HGU and settlements related to this have been carried out several times involving many parties, but it has not yet been fully completed. The issue of land grabbing has also not been covered in the company's social impact management and monitoring plan.

Non-Conformance Description (filled by auditor):

Based on this evidence, the Company has not been able to show that a review of the social impact management plan has been carried out to all affected parties and there are several social issues that have not been covered in the social impact management plan for 2022.

Root Cause Analysis (filled by organization audited):

The review of the social impact management and monitoring plan in 2022 has not been given a questionnaire for all affected villages and stakeholders, this is because the previous PICs did not understand well the procedures for preparing the social impact management plan program as stated in the SOP Corporate Social Responsibility No. Policy : 361/TJSL-CSR/COM dated 09/11/2015.

Correction (filled by organization audited):

Conducting questionnaires on all affected villages and stakeholders such as Ladang Panjang, Trimulya Jaya, Petaling Jaya and Sungai Gelam Villages, Plasma Farmers, local suppliers, Company employees and contract workers whose previous questionnaires have not been carried out to improve the preparation of the management plan program and social impact monitoring in 2022 (Documentation of the activities of the questionnaire, recapitulation and program revision of the 2022 social impact management and monitoring plan is attached).

Corrective Action (filled by organization audited):

- Monitoring of the preparation of the management plan program and monitoring of social impacts is carried out by the Company's Sustainability Staff.
- Conduct socialization on the new PIC as a replacement for the previous PIC related to the preparation of the management plan program and monitoring of social impacts by the Manager.
- Inter – Office Mail from Area Controller Jambi regarding Implementation and Monitoring of Social Impact Management PT. Bahari Gembira Ria Date 28-04-2022 No 15/ACJ-SKP/IV/2022.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification April 27, 2022

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

- PT BGR's social impact assessment questionnaire conducted on April 21, 2022 to several stakeholders such as employees (plantation, factory, contractors and workers), village communities (Ladang Panjang Village, Petaling Jaya Village, Sungai Gelam Village, Trimulya Jaya Village), Plasma Farmers (The Karya Maju Cooperative, the Karya Mandiri Cooperative, the Marga Jaya Cooperative, and the Mitra Inti Cooperative).
- Documentation in the form of photos of village/community interviews.
- Recapitulation of the realization of interviews and questionnaires for PT BGR's SIA program preparation activities. The results of the recapitulation of the preparation of the SIA program were carried out to 14 Village Community People, 11 Plasma Farmers, 12 Employee Representatives and Contractors.
- Attendance The SIA program preparation meeting was held on 27 April 2022 which was attended by 10 Participants from the Company.
- PT BGR Social Impact management plan for the period 2022 – 2024 determined based on the results of the questionnaire consists of:
 - **Potential land conflicts.** Planned activities carried out by resolving land disputes with related parties by involving Government Agencies.
 - **Facilities and infrastructure.** The plan of activities carried out is to repair Road/Bridge facilities, to repair housing facilities and infrastructure for employees and contractor workers.
 - **Public welfare.** The planned activities provide job opportunities to the surrounding community, provide opportunities to establish cooperation/partners with local communities, disseminate fruit quality and fruit quality for harvest requirements, and give permission to traders to enter the company's location to sell.
 - **Field of education.** The planned activities are to provide a company scholarship program, provide school facilities and transportation facilities.
 - **Economics.** The plan of activities carried out is to provide food assistance and other necessities of life.
 - **Health.** The planned activities are to provide medical treatment assistance at the company's clinic to employees and the community.
 - **Religious Sector.** The planned activities are to provide assistance and repair facilities for houses of worship.
 - **Environmental Sector.** The planned activities are watering roads during the dry season, repairing and cleaning factory drainage, carrying out minimal oil losses, processing and managing waste pools according to procedures, providing trash bins in every housing, managing B3 waste in residential areas.
 - **Environmental sustainability.** The plan of activities carried out is to disseminate information to the community about the existence of HCV and install warning signs to protect the HCV area, prohibition of burning, prohibition of hunting for protected animals, etc.
- Inter – Office Mail Number 002/BGR-LPF/INT-LPF/IV/2022 from Factory Manager on 11 April 2022 regarding the appointment of a monitoring officer for PT Bahari Gembira Ria's social impact program.
- Monitoring Planned activities for PT BGR's SIA program.
- Socialization of CSR SOPs (one of which is related to SIA) on April 11, 2022 to 10 participants from the Company. Among the participants are PIC SIA appointed by the Company.
- Root Cause Analysis, Corrections, and Corrective Actions taken by the company. However, there are still questions from the Auditor related to the root of the problem that must be explained by the Company and ensure corrective actions are taken by the company so that this discrepancy does not occur again in the next assessment.

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

Auditor Verification May 6, 2022

The company has sent proof of improvement in the form of:

- Root cause analysis, Corrections, and Corrective Actions that have been corrected according to the Auditor's questions/responses.
- Inter Office Mail from Area Controller Jambi to Unit Head of PT Bahari Gembira Ria with Number 15/ACJ-SKP/IV/2022 on 28 April 2022 regarding the implementation and monitoring of PT Bahari Gembira Ria's social impact management as corrective action by the company. The Inter Office Mail explained several things that were of concern to be implemented, such as the implementation of the social impact management program, coordinating with the leadership and ensuring that the appointed PIC monitored the social impact plan.

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

Verified by : Rahmat Abdiansyah

NCR No.	:	2022.03	Issued by	:	Septian Maulana
Date Issued	:	9 April 2022	Time Limit	:	8 July 2022
NC Grade	:	Major	Date of Closing	:	6 May 2022
Standard Ref. & Requirement	:	6.7.3 Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.			
Evidence observed (filled by auditor): The company has a PPE SOP number SPO/040/BGR/16 dated December 3, 2016, briefly explaining: <ul style="list-style-type: none">Everyone is responsible for wearing the appropriate PPE and wearing the correct tools for the job being done.PSQM/ESH Manager staff are responsible for monitoring that PPE is worn properly.Assistant/ Sr. The assistant/manager is responsible for ensuring that employees have and wear the necessary PPE and that the PPE is in good condition. The results of the review of the PPE Replacement SOP document on January 7, 2019, briefly explained: <ul style="list-style-type: none">Replacement of PPE must be approved by the assistant of the employee concerned.Submit damaged PPE to Division Assistant as evidence.Employees are required to replace the PPE used if:<ul style="list-style-type: none">The period of use is more than 1 year for safety shoes and or is not suitable for use.Helmet if it is broken / cracked and or has faded in colorIn addition to safety shoes and helmets, the replacement period refers to the PPE manual/brochure. Based on the results of interviews and field visits, several facts were found including: <ul style="list-style-type: none">The results of interviews with management representatives revealed that PPE can be replaced with new ones if the PPE has been damaged before the replacement period.The results of interviews with workers revealed that the provision of PPE boots once every 1 (one) year.The results of the study of the handover document for PPE for Harvesters found that the last supply of PPE for shoes was on June 14, 2021.The results of field visits and interviews at Ladang Panjang Estate found the following:<ul style="list-style-type: none">It was found that 1 permanent harvest worker worked using short rubber shoes provided by himself because the boots from the company were damaged, this had been conveyed to the foreman and forwarded to the next superior but was not given a replacement by the company because it was not yet time for replacement.It was found 2 contractor workers for FFB loading activities including 1 worker using PPE in the form of short rubber shoes and 1 worker using boots that were provided by themselves because they were not provided by the contractor or company.It was found that 1 Contractor Worker for harvesting activities did not use PPE in the form of helmets and shoes because the PPE provided by the contractor was damaged.The results of the field visit in POM's Long Field found the following:<ul style="list-style-type: none">At the Press station, it was known that there were warnings on the use of PPE, one of which was ear protection, but there were still 3 workers at the Press station who did not use ear protection at work.					

- At the Boiler station, it is known that there is a warning on the use of PPE, one of which is ear protection, but it was found that 1 worker at the Boiler station did not use ear protection in the form of ear plugs when working.

Non-Conformance Description (filled by auditor):

Based on this evidence, it is concluded that there are workers who do not use PPE when working in accordance with the risk analysis set by the company and there are also workers who buy their own PPE because the PPE provided by the company has been damaged, which is not in accordance with the procedures provided by the company. owned by the company.

Root Cause Analysis (filled by organization audited):

- Replacement of damaged employee PPE for employees has not been replaced by the Division Assistant, this is because the Division Assistant does not understand the PPE replacement SOP properly.
- PPE for contract workers is provided by the contractor, but due to the high turnover of contractor workers, there are some contractor workers who have not been provided with PPE.
- There are several workers at press stations and boilers who do not use PPE for ear protection, this is due to the lack of employee discipline in the application of PPE, especially ear protectors.

Correction (filled by organization audited):

- Disseminate SOPs for replacing damaged PPE for all plantation and factory assistants by the Unit Manager, SQM/ESH staff and employee PPE that has been damaged/unsafe to be used for replacement.
- Providing PPE to employees and contract workers by the company and contractors, both damaged and non-existent.
- Provide warning letters to employees who do not comply with the use of PPE.

Corrective Action (filled by organization audited):

- Monitoring the application of PPE and the condition of PPE to workers every day during muster morning/shift changes at the Mill by the Foreman, Assistant so that workers who do not wear PPE and/or PPE in a damaged condition can take immediate corrective action.
- Inter – Office Mail from Area Controller Jambi regarding Discipline Affirmation of the Use of Personal Protective Equipment (PPE) for Workers on 28-04-2022 No 16/ACJ-SKP/IV/2022.

Assessor Evaluation and Conclusion (filled by auditor):
Auditor Verification April 27, 2022

The company has shown evidence of improvements in the form of:

- Evidence of socialization of PPE replacement SOP which was attended by Head of Section and Assistant on April 13, 2022.
- Evidence of PPE submission including:
 - Proof of handing over PPE in the form of shoes to 22 harvesters in division III LPE on April 16, 2022
 - Proof of PPE submission in the form of 3 pairs of shoes and 4 helmets to 7 contractor workers on April 6, 2022
- Monitoring the use of PPE that informs compliance with the use and condition of PPE, for example:
 - Monitoring the use of PPE for harvest workers on 22 – 27 April 2022
 - Monitoring the use of PPE for contractor harvest workers on 22 – 27 April 2022
 - Monitoring the use of PPE for factory workers on 22 – 27 April 2022
- Letter of warning to employees who do not use PPE.
- Root Cause Analysis, Corrections, and Corrective Actions taken by the company. However, there are still questions from the Auditor regarding Corrective Actions that must be explained by the Company.

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

Auditor Verification on May 6, 2022

The company has shown additional identification of corrective actions as well as proof of improvement in the form of Inter-Office Mail from Area Controller Jambi number 16/ACJ-SKP/IV/2022 dated 28 April 2022 regarding Discipline Affirmation of the Use of Personal Protective Equipment (PPE) for Workers.

Based on the evidence of improvement sent by the company, the non-conformance with this indicator is declared **Fulfilled**.

Verified by : **Septian Maulana**

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-2.1

NCR No.	: 2023.01	Issued by	: Rindu Galih Rezza Rachmansyah
Date Issued	: 14 April 2023	Time Limit	: 13 July 2023
NC Grade	: Minor Raised to Major	Date of Closing	: 13 July 2023
Standard Ref. & Requirement	2.2.2 All contracts, including contracts with FFB suppliers, have separate clauses regarding fulfillment of relevant legal obligations, and can be verified by the third party concerned.		

Evidence observed (filled by auditor):
Based on the results of a review of documents related to contractors and compliance with relevant regulations, the following facts were found:

PT Technindo Contromantra (Overhaul Boiler Contractor)

- Work Agreement Letter No. 037/Boiler/BGR-LPF/XI/2022 dated November 16, 2022, which already contains regulations to comply with applicable laws and regulations, such as worker age, wages, OHS, BPJS and so on. There has been a signing of the Vendor Integrity Pledge for COBC (Code of Business Conduct).
- The list of employees consists of 7 people and all of them are over 18 years of age. However, there is no explanation on the status of these workers whether they are PKWT or PKWTT workers and it cannot be proven that all workers have a working relationship with the contractor.
- Has Monitoring Compliance with Legal Requirements that are Relevant to compliance that is monitored there are as many as 6 compliances namely Legality Documents, OHS Requirements, Employment BPJS, Health BPJS, Employee Wages, and Employment Relations. Of all these things, the contractor only fulfils a few compliances, such as:
 - ❖ Legality Compliance has been fulfilled and supporting documents can be shown.
 - ❖ BPJS Health compliance has been fulfilled (but only for 1 worker, while the other 6 workers don't have it yet).
 - ❖ Employment BPJS compliance has been fulfilled (only for 6 workers, while 1 other worker does not have it yet).
 - ❖ Compliance with PPE has been fulfilled (evidenced by providing PPE to workers and showing the minutes of the handover).
 - ❖ Compliance with Labor Relations is not yet available.
 - ❖ Compliance Wages of workers are not yet available.
- Have an evaluation of the fulfillment of relevant legal requirements referring to 3 laws and regulations, namely:
 - ❖ Law No. 01 of 1970 concerning Occupational Health and Safety, which was declared to have been fulfilled by the contractor by the company (but for first aid compliance it was not fulfilled).
 - ❖ Law No. 24 of 2011 concerning the Social Security Administrative Body, which has been declared fulfilled by the contractor by the company (however BPJS Health and Employment has not been fully registered).
 - ❖ Law No. 13 of 2003 concerning Manpower, which has been declared fulfilled by the contractor by the company (however focused on the prohibition of employing children, while wages and work agreements have not been shown to be fulfilled).

PT Putra Empat Zheed (Empty Bunch, CPO & PK Transporter)

- Work Agreement Letter No. 013/BGR-SPK/LPE/II/2023 dated 02 January 2023 which already contains the requirements to comply with applicable laws and regulations such as age of worker, wages, OHS, BPJS and so on. There has been a signing of the Vendor Integrity Pledge for COBC (Code of Business Conduct).
- There are 10 workers on the list (4 for CPO/PK drivers and 6 for empty-length drivers) and all of them are over 18 years of age. However, there is no explanation on the status of these workers whether they are PKWT or PKWTT workers and it cannot be proven that all workers have a working relationship with the contractor.
- Have Monitoring of Compliance with Legal Requirements that are Relevant with 6 compliances being monitored, namely Legality Documents, OHS Requirements, Employment BPJS, Health BPJS, Employee Wages, and Employment Relations. Of all these things, the contractor only fulfils a few compliances, such as:
 - ❖ Legality Compliance has been fulfilled and supporting documents can be shown.
 - ❖ BPJS Health compliance has been fulfilled (but only for 2 workers, while the other 8 workers don't have it yet).
 - ❖ Employment BPJS compliance has been fulfilled (only for 6 workers, while 4 other workers do not have it yet).
 - ❖ Compliance with PPE has been fulfilled (evidenced by providing PPE to workers and showing the minutes of the handover).
 - ❖ Compliance with Labor Relations is not yet available.

- ❖ Compliance Wages of workers are not yet available.
- ❖ SIM compliance has been fulfilled by showing SIM ownership for all drivers (10 drivers).
- Have an evaluation of the fulfillment of relevant legal requirements referring to 4 laws and regulations, namely:
 - ❖ Law No. 01 of 1970 concerning Occupational Health and Safety, which was declared to have been fulfilled by the contractor by the company (but for first aid compliance it was not fulfilled).
 - ❖ Law No. 24 of 2011 concerning the Social Security Administrative Body, which has been declared fulfilled by the contractor by the company (however BPJS Health and Employment has not been fully registered).
 - ❖ Law No. 13 of 2003 concerning Manpower, which has been declared fulfilled by the contractor by the company (however focused on the prohibition of employing children, while wages and work agreements have not been shown to be fulfilled).
 - ❖ Law No. 22 of 2009 concerning Traffic and Highways, which has been declared fulfilled because all drivers already have a SIM (Driving License) in accordance with these regulations.

CV Arta Citra Lestari (Harvesting Activity & FFB Transporter)

- Work Agreement Letter No. 005/BGR-LPE/SPK/II/2023 dated January 7, 2023, which already contains the requirements to comply with applicable laws and regulations, such as worker age, wages, OHS, BPJS and so on. There has been a signing of the Vendor Integrity Pledge for COBC (Code of Business Conduct).
- Based on the registration of workers at the Manpower and Transmigration Office of Muaro Jambi Regency, the contractor has registered 11 workers (4 workers loading FFB and 7 workers harvesting FFB) with PKWT status (SPK with contractors and all have been shown). None of these workers are under 18 years of age.
- Proof of payment of workers' wages from the contractor in the March 2023 period for a total of 11 workers and all of them received wages above the minimum wage set by the government.
- Have Monitoring of Compliance with Legal Requirements that are Relevant with 6 compliances being monitored, namely Legality Documents, OHS Requirements, Employment BPJS, Health BPJS, Employee Wages, and Employment Relations. Of all these things, the contractor only fulfils a few compliances, such as:
 - ❖ Legality Compliance has been fulfilled and supporting documents can be shown.
 - ❖ BPJS Kesehatan compliance has been fulfilled, but from the list of BPJS Kesehatan ownership there is not a single worker who has it.
 - ❖ Employment BPJS compliance has been fulfilled, but only for 5 workers while the other 6 workers do not yet have it.
 - ❖ Compliance with PPE has been fulfilled (evidenced by providing PPE to workers and showing the minutes of the handover).
 - ❖ Compliance with Labor Relations is not yet available.
 - ❖ Compliance Wages of workers are not yet available.
- Have an evaluation of the fulfillment of relevant legal requirements referring to 3 laws and regulations, namely:
 - ❖ Law No. 01 of 1970 concerning Occupational Health and Safety, which was declared to have been fulfilled by the contractor by the company (but for first aid compliance it was not fulfilled).
 - ❖ Law No. 24 of 2011 concerning the Social Security Administrative Body, which has been declared fulfilled by the contractor by the company (however BPJS Health and Employment has not been fully registered).
 - ❖ Law No. 13 of 2003 concerning Manpower, which has been declared fulfilled by the contractor by the company (however focused on the prohibition of employing children, while wages and work agreements have not been shown to be fulfilled).

From the evidence found above, it can be concluded that the company does not yet have clear procedures/mechanisms for monitoring and evaluating compliance with relevant regulations, such as:

- The time frame for conducting monitoring and evaluation, because the monitoring and evaluation shown was only carried out during the audit activity (the evaluation was carried out on April 12, 2023).
- The monitoring and evaluation results shown are out of sync with the evidentiary documents shown starting from the fulfillment of BPJS Health and BPJS Employment (stated to have been fulfilled but from the evidence shown not all were fulfilled).
- There is still evidence of compliance shown but not monitored and evaluated such as compliance related to work agreements between workers and contractors (this has been a non-compliance in the previous assessment), wages and age requirements for workers.
- The results of the evaluation state that all third parties that have worked with the company so far have not complied with the fulfillment of relevant regulations that have been reviewed by the company and the company has not shown a target for these legal obligations to be met by the cooperating third parties.

<p>Non-Conformance Description (filled by auditor):</p> <p>The company has not been able to show evidence that all third parties working with the company have fulfilled relevant legal obligations and can be proven by third parties supported by clear procedures/mechanisms.</p>
<p>Root Cause Analysis (filled by organization audited):</p> <p>The company already has a procedure/mechanism of Legal Compliance Requirements for Third Parties No. 001/BGR-PPPHK/I/2022 dated 22 January 2022, but the procedure has not fully contained the relevant legal requirements for third parties.</p>
<p>Correction (filled by organization audited):</p> <ul style="list-style-type: none"> Revise the procedure/mechanism of Legal Compliance Requirements for Third Parties No. 001/BGR-PPPHK/I/2022 by including compliance with relevant regulations from third parties (Revised SOP Attached) Complete legal compliance requirements on all existing contractors (3rd party legal compliance attached) Update Evaluation of legal requirements for third parties (Document attached)
<p>Corrective Action (filled by organization audited):</p> <p>Appoint a PIC who monitors compliance with third party legal requirements in each unit (Estate and Mill).</p>
<p>Assessor Evaluation and Conclusion (filled by auditor):</p> <p>Verification on 13 July 2023</p> <p>The company has determined the root of the problem, corrective and corrective actions to meet the discrepancies that occurred during the surveillance 2.1 assessment. In addition, there is also some evidence that has been shown as follows:</p> <ul style="list-style-type: none"> Document Revision 01 of Procedure No. 001/BGR-PPHKJ/I/22 concerning SOP on Legal Compliance Requirements for Third Parties on April 18, 2023. Where in the revision the company added compliance with legal requirements for outsourcing companies (third parties) that collaborate with companies along with the timeframe. In the change, the company has required that the evaluation be carried out at least once a year, the fulfillment of regulations that must be met include those related to the contractor's work relationship with the workers, BPJS, wages, required worker competencies, and others. Letter No. 075/SK/LPE/V/2023 dated 02 May 2023 from the Estate Manager regarding the Appointment of In-Charge Personnel (PIC) Monitoring Compliance with Legal Requirements of Third Parties at the Ladang Panjang Estate Unit, the letter was addressed to Mr. Mutiara Nanda who has been appointed as the PIC who is responsible for monitoring the legal requirements of third parties. Letter No. 01/SK/IV/2023 dated 20 April 2023 from the Factory Manager regarding the Appointment of In-Charge Personnel (PIC) Monitoring Compliance with Legal Requirements of Third Parties at the Ladang Panjang Factory Unit, the letter was addressed to Mr. David Parada Marpaung who has been appointed as the PIC in charge of monitoring the legal requirements of third parties. Documents for Monitoring Compliance with Third Party Legal Requirements updated for 2022/2023 on May 22, 2023, where there is evidence as follows: <ul style="list-style-type: none"> CV Arta Citra Lestari <ul style="list-style-type: none"> The list of workers currently working is 11 people, all of whom have a working relationship with the contractor as workers with PKWT status (Specific Time Work Agreement) and there are no workers under 18 years of age. Have proof of BPJS Health membership for as many as 7 workers registered and paid for by the company, while for 4 other workers they have received BPJS Health from the government/PBI (Recipients of Contribution Assistance). Have proof of BPJS <i>Ketenagakerjaan</i> membership for as many as 11 people with details of 5 workers previously registered and for 6 others only registered in the May 2023 period (also paid for that period). Have proof of salary slip for wages for the April 2023 period paid in May 2023, the amount of which is in accordance with the minimum wage set by the government in 2023. Show proof of handover of PPE and first aid kit to each worker and person in charge of work in the field (especially for first aid). PT Putra Empat Zheed <ul style="list-style-type: none"> The list of workers currently working is 10 people, all of whom have a working relationship with the contractor as workers with PKWT status (Specific Time Work Agreement) and there are no workers under 18 years of age. Have proof of BPJS Health membership for as many as 3 workers who are registered and paid by the company, while for 7 other workers they have received BPJS Health from the government/PBI (Recipients of Contribution Assistance).

- ❖ Have proof of BPJS Employment membership for as many as 10 people along with proof of payment of contributions for the May 2023 period.
- ❖ Have proof of salary slip for wages for the April 2023 period paid in May 2023, the amount of which is in accordance with the minimum wage set by the government in 2023.
- ❖ Show proof of handover of PPE and first aid kit to each worker and person in charge of work in the field (especially for first aid).

PT Technindo Contromatra

- ❖ The list of workers currently working is 7 people, all of whom have a working relationship with the contractor as workers with PKWT status (Specific Time Work Agreement) and there are no workers under 18 years of age.
- ❖ Have proof of BPJS Health membership for as many as 7 workers who have received BPJS Health from the government/PBI (Recipients of Contribution Assistance).
- ❖ Have proof of BPJS Employment membership for as many as 7 people along with proof of payment of contributions for the May 2023 period.
- ❖ Have proof of Salary Slip for wages for the April 2023 period paid in May 2023, the amount of which is in accordance with the minimum wage set by the government in 2023.
- ❖ Show proof of handover of PPE and first aid kit to each worker and person in charge of work in the field (especially for first aid).

Based on the improvement evidence mentioned above, the discrepancies in this indicator have been declared fulfilled and will be observed again in the next assessment related to the consistency of implementing new procedures and the effectiveness of the PIC set by the company.

Follow up on next audit (filled by auditor):

Verified by	:	Rindu Galih Rezza Rachmansyah
-------------	---	-------------------------------

NCR No.	:	2023.02	Issued by	:	Rindu Galih Reza
Date Issued	:	14 April 2023	Time Limit	:	ASA-2.2
NC Grade	:	Minor	Date of Closing	:	04 Juni 2023
Standard Ref. & Requirement	:	7.3.2 There is evidence of waste disposal according to procedures fully understood by workers and managers			
Evidence observed (filled by auditor): The company already has a waste management procedure (solid, liquid and air) which is contained in the document: <ul style="list-style-type: none">● SOP Station Final Effluent dated 7 January 2010, which explained one of the details regarding waste pond treatment, such as paying attention to pond level, multi feeding feed system, and nutritional conditions of sewage pond testing during the sedimentation process.● SOP for Utilization of Liquid Waste for Fertilizer (Land Application), which describes:● Effluent from pool 1 flows through underflow to pool number 2.● System maintenance: responsible for carrying out installation, operational inspection of pumps between waste ponds and from waste ponds to application blocks in coordination with processing assistants and laboratories by placing mechanical and electrical personnel.● SOP for handling solid waste number 027/PT BGR/2014, no. Revised RSPO/P&C/PLNB-3, dated 1 November 2014. In this procedure, there is a flowchart for the utilization of fiber and shells as boiler fuel, empty fruit bunches as fertilizer and boiler ash used for road repairs.● SOP for Waste Management dated March 28, 2019, it is known that domestic waste generated from housing and offices will be disposed of in landfills. Based on the memorandum of the Head Plantation Upstream Indonesia on August 7, 2014, concerning Guidelines for Fire Prevention and Management number M-077/HPUI/VIII/2014 conveying a zero-burning policy, and a ban on burning waste. Based on the PRQM Head in Charge memorandum No.009/PSQM-UM/X/2011 concerning Housing Fire Prevention and Management, stated that it is prohibited to destroy domestic waste or household waste by burning it. Based on the results of field visits in the company's operational areas, it is known that there is waste management that is not in accordance with the procedures that are owned, among other things: 5. IPAL <ul style="list-style-type: none">● There is an overflow in pond number 1, where sewage overflows from the pond and pollutes the environment.● There are damaged tools that are abandoned in pools number 2, 3 and 4, namely agitators and mixers.● There was a fallen tree around pool number 1, which broke the pond embankment and liquid waste overflowed from the pool.● Pool number 3 has experienced siltation, and is already hard and has a lot of overgrown grass (not functioning properly). 6. Empty Bunch Area <ul style="list-style-type: none">● There is no evidence yet that the leachate produced does not pollute the environmental area.● It has not been shown the drainage of the leachate produced. 7. Factory Area <ul style="list-style-type: none">● There are piles of scrap iron that are located in an inappropriate place around the empty stack area, and are not given a safety line.● Cannot be shown the estuary of the PKS drainage. 8. Housing Complex <ul style="list-style-type: none">● In the Landfill area, waste is not disposed of in the sinkhole but is left scattered around the TPA.● Burnt trash was found at 5 different points in the Ladang Panjang Estate Division III housing complex. Non-Conformance Description (filled by auditor): The company has not been able to ensure that waste disposal is in accordance with procedures and is understood by all workers and managers.					

Root Cause Analysis (filled by organization audited):

All procedures regarding waste disposal have not been implemented properly, this is due to a lack of understanding of these procedures by workers and managers, besides that this is due to a lack of control due to employee mutations.

Correction (filled by organization audited):

1. Discussion to understand the implementation of waste and waste management by the Manager and supervision (Documentation attached).
2. Disseminate waste and waste management procedures to workers (Documentation attached).
3. Carry out waste management:
 - a. IPAL
 - 1) In IPAL Pool Number 1, the Underflow Pipe does not work
Response: In IPAL Pool Number 1 the Underflow Pipe is not functioning due to oil freezing in the pipe due to low pool temperature (high rain intensity) and lack of maintenance on the underflow pipe. The repairs made were the installation of a new underflow pipe from pool no. 1 to pool no. 2 (Documentation of installation of new pipe installation is attached)
 - 2) There is an overflow in pond number 1, where sewage overflows from the pond and pollutes the environment.
Response: Pond no. 1 overflowed because of the flow of waste water from pond no. 1 to waste pond no. 2 plugs, and repairs were made to install a new underflow pipe from pond no. 1 to waste pond no. 2 so that the wastewater level is no. 1 goes down (no longer overflows) and the overflowing waste water is cleaned and the embankment reinforcement is added (cleaning documentation is attached).
 - 3) There are damaged tools that are abandoned in pools number 2, 3 and 4, namely agitators and mixers
Response: The tools in the pool are no longer used and some of the spare parts are used for machines in factory operations. The improvements made were moving the agitator and mixer tools to the scrap iron collection site (Documentation of moving the agitator and mixer is attached).
 - 4) There was a fallen tree around pool number 1, which broke the pond embankment and liquid waste overflowed from the pool
Response: The tree was uprooted because it disturbed the path of the PLN power cable (PLN installation project at PT. BGR) and the pond embankment was overwritten by the tree. The improvements made were cleaning the waste pond embankment area from former fallen trees and adding embankment reinforcement (Documentation for cleaning the waste pond embankment area is attached).
 - 5) Pool number 3 has experienced siltation, and is already hard and has a lot of overgrown grass (not functioning properly).
Response: Pool number 3 is experiencing siltation, is already hard and overgrown with grass due to the fact that it has not been carried out for a long time by washing/dredging/desludging, the last one was carried out on 6 August 2016. The improvement being made is to carry out washing/dredging/desludging in July 2023. This project has been budgeted by the factory in the form of Capital Expenditure (CAPEX) for 2023 and temporarily washing is carried out by unit-tagged equipment (CAPEX and work program plan attached).
 - b. Empty Bunch Area
 - 1) There is no evidence yet that the leachate produced does not pollute the environmental area.
Response: The management of the leachate produced does not pollute the environmental agency, such as:
 - i. Construction of leachate retaining embankments so as not to pollute the environment
 - ii. Make a leachate collection tank
 - iii. Pumping leachate into the factory waste water storage tank which is sent to the WWTP and the installation still uses a temporary system (using a submersible pump and hose). Another improvement that will be carried out is installing a permanent installation, namely a pump and PVC pipe (Documentation for installing pipe and pump installation is attached)
 - 2) It has not been shown the drainage of the leachate produced
Response: Drainage uses PVC pipe installation as described above (Documentation as above).
 - c. Factory Area
 - 1) There are piles of scrap iron that are located in an inappropriate place around the empty stack area, and are not given a safety line
Response: This is due to the ongoing boiler no.1 overhaul work so that used boiler materials that are still being used are collected/placed around the empty bunk area and plans will be collected at the scrap iron gathering place when the work is done. The improvements made were moving the boiler scrap iron to a temporary iron gathering place beside

the boiler and given a safety line because it will be reused and scrap iron that is no longer used is collected at the scrap iron place (Documentation attached).

2) Cannot be shown the estuary of the PKS drainage

Response: The estuary from the factory rainwater drainage flows into the stretched river (Documentation of the layout of the PKS drainage flow is attached).

d. Housing Area

1) In the Landfill area, waste is not disposed of in the sinkhole but is left scattered around the TPA

Response: The waste in the landfill area has not been dumped into the hole because the garden loader has been pushing it into the damaged hole since April 5, 2023. The improvement that has been made is to put the waste into the hole using a loader from PKS (documentation attached).

2) Burnt trash was found at 5 different points in the Ladang Panjang Estate Division III housing complex.

Response: This is caused by the absence of monitoring of waste management, so it is not certain that the garbage disposal schedule will proceed according to procedure. The repairs made were cleaning up the burnt waste (Junk cleaning document).

Corrective Action (filled by organization audited):

Waste management so that it is carried out properly / does not repeat the same thing in the future as described above what is done is:

- WWTP Pool: Monitoring WWTP conditions every day by the Process Assistant (Evidence of monitoring is attached).
- Empty storage areas: Monitoring the condition of empty storage areas every day by the Process Assistant (monitoring evidence is attached).
- PKS Area: Monitoring the cleanliness of the factory at each station by the Safety Officer (Monitoring evidence attached).
- Employee Housing Area: Monitoring waste management in each unit. (Proof of monitoring and PIC attached).

Assessor Evaluation and Conclusion (filled by auditor):

Verification on 04 June 2023

Companies can show evidence of improvement in the form of:

- Coordination related to the understanding, application and management of waste at LPF on 27 April 2023 and 11 May 2023
- Dissemination of garbage and waste management to LPF employees on May 4, 2023
- Information dissemination on waste management by LPE on 27 April 2023
- Documentation related to the PKS drainage flow which explains the drainage channel, water trap and drainage estuary
- Documentation and improvement of waste and waste management in the plantation and PKS
- The program and plan for desludging / dredging the waste pool at Ladang Panjang Factory is planned to be carried out from the fourth week of May 2023 to the fourth week of June 2023
- Checklist for monitoring sewage ponds at Ladang Panjang Factory for the period May 2023
- Checklist for monitoring the JJK area in Ladang Panjang Factory for the period of May 2023
- Checklist for monitoring the cleanliness of the huts at LPE and LPF for the period May 2023
- SK No 01/SK/V/2023 dated 01 May 2023 regarding Appointment of In-Charge Personnel (PIC) for Waste Management in the Ladang Panjang Factory Housing Unit
- SK No 01/SK/V/2023 dated 01 May 2023 regarding Appointment of In-Charge Personnel (PIC) for Waste Management in the Ladang Panjang Factory Housing Unit
- SK No SK/BGR-LPE/2022/1/012 regarding assignment as PIC of housing waste management.

Based on the improvement evidence mentioned above, the discrepancies in this indicator have been declared fulfilled and will be observed again in the next assessment related to the consistency of implementing new procedures and the effectiveness of the PIC set by the company.

Follow up on next audit (filled by auditor):

Verified by : Moh Arif Yusni

3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	1.1.2	<p>The results of document verification revealed that the implementation of OHS had been reported to the Manpower Office. However, the results of the document review revealed that there were several reports that exceeded the period as follows:</p> <ul style="list-style-type: none"> - LPF Quarter I 2022 P2K3 Report to the Manpower and Transmigration Office of Muaro Jambi Regency and the Jambi Provincial Office of Manpower and Transmigration which was reported on 02 May 2022. - LPF 2022 Quarter II P2K3 Report to the Manpower and Transmigration Office of Muaro Jambi Regency and the Jambi Provincial Office of Manpower and Transmigration which was reported on September 8, 2022. - LPF 3rd Quarter 2022 P2K3 Report to the Office of Manpower and Transmigration of Muaro Jambi Regency and the Office of Manpower and Transmigration of Jambi Province which was reported on 12 December 2022. - P2K3 Quarter IV 2022 LPF Report to the Manpower and Transmigration Office of Muaro Jambi Regency and the Jambi Provincial Office of Manpower and Transmigration which was reported on March 27, 2023. <p>Related to this, companies are encouraged to submit mandatory reports to the government in accordance with a predetermined time period.</p>
2	2.1.1	<p>Based on document verification and interviews with management, it was found that the company was directed to carry out the Addendum Process for AMDAL and RKL-RPL Type B based on a letter from DLH Muaro Jambi Regency number 660.4/127/II.I/DLH regarding Changes in Directives for Screening Environmental Documents PT Bahari Gembira Ria , on August 31, 2022, the contents of the letter:</p> <ul style="list-style-type: none"> • For directives to make changes to environmental approvals if businesses and/or activities that have obtained an Environmental Feasibility Decree or an Approval for a Statement of Ability to Manage the Environment, changes are planned, as well as provisions in Article 91 paragraph (1) letter c amending the Environmental Feasibility Decree Living with the obligation to prepare and evaluate the Addendum of Andal and RKL-RPL. • Based on this explanation, changes to the PT Bahari Gembira Ria oil palm plantation Environmental Permit from $\pm 20,551$ Ha of land (for nucleus and plasma) to $\pm 2,998.23$ Ha (only for the core scope that is included in the environmental document review) are required to prepare an Addendum to Andal and RKL-RPL type B to the Regent of Muaro Jambi through the DLH of Muaro Jambi Regency. <p>Regarding these directives, the following are several follow-up steps from the company:</p> <ul style="list-style-type: none"> • The company wrote a letter to PT Anugrah Agung Nusantara (as a consultant for preparing the AMDAL) with letter number O/Reff: 096/RTC-RSS/AWD-BGR/XII/2022 on December 19, 2022, regarding the Work Award Letter for Management of Changes in Environmental Permits and Preparation Addendum to PT Bahari Gembira Ria AMDAL Documents. • Then issued SPK No.001/Amdal/BGR/II/2023 between PT BGR and PT Anugrah Agung Persada on January 5, 2023, in the SPK stated that all work must be completed within 6 months from January 5, 2023. • Work Handover Minutes on Thursday, January 5, 2023, a work handover was carried out between PT BGR and PT AAP. <p>Companies are encouraged to ensure that the AMDAL addendum preparation process can run positively and can be completed according to a predetermined timeline and can immediately submit an AMDAL addendum request to DLH Muaro Jambi Regency when the AMDAL addendum document is completed by the consultant.</p>
3	4.2.3	<p>Based on the results of a review of internal complaint book documents, it is known that there have been several complaints submitted since 2022-2023 which have been recorded in the complaint book. However,</p>

		<p>the book does not have some information such as the date the complaint was received, the date the complaint was responded to, and the current status has been completed. This is because the company still plans that these complaints will be included in the application so that the recording is only done on a temporary basis.</p> <p>Currently the company is implementing a new system for reporting worker complaints, especially for house problems, in the Home Improvement Application (APR) which has been installed in each house with a barcode system. However, not all workers have used it and understood it, so the company still uses manual methods to record it.</p> <p>The company has the opportunity to ensure that the APR system (House Improvement Application) can be understood/applied as a whole and that complaints related to houses that were previously reported manually have been properly monitored in a timely manner.</p>
4	5.1.7	<p>The company has tested the weighing equipment in 2021 and is set to test the weighing equipment again in December 2022.</p> <p>The company has made a request to test the weighing equipment again before December 2022, via the following communication:</p> <ul style="list-style-type: none"> On September 12, 2022, PT BGR made an Internal Memo Office-to CV Mandiri Jaya number 061/BGR-LPF/External/IX/2022 regarding the Request for Offer for Re-Casing of Electronic Bridge Scales for Two Units of Full Loadcell Electronic Type Scales Brand Mettler Toledo and Avery Weight Tronix. CV Mandiri Jaya letter number 120/CV.MJ-JBI/SRT/IX/2022 regarding the Request for Calibration/Re-Calibration on September 13, 2023. From the examiner sent a letter to the Head of the UMKM Cooperative, and Industry and Trade Service. CV Mandiri Jaya sent a letter to PT Bahari Gembira Ria with letter number 035/CV.MJ-JBI/SRT/II/2023 on 18 February 2023, regarding a Statement Letter that CV Mandiri Jaya has not been able to carry out PT's Scale Bridge Re-calibration Work PT Bahari Gembira Ria in 2023. CV Mandiri Jaya sent a letter back to PT Bahari Gembira Ria with letter number 067/CV.MJ-JBI/SRT/IV/2023 on April 5, 2023, regarding a statement that CV Mandiri Jaya has not been able to carry out the Re-calibration Work of the Weigh Bridge PT Bahari Gembira Ria in 2023. CV Mandiri Jaya has submitted a Re-Calibration Application to the Metrology Service and is currently still waiting for confirmation of the implementation schedule. <p>Companies are encouraged to ensure that the implementation of weighing equipment calibration can run positively and can be carried out in 2023.</p>

3.4.4. Noteworthy Positive Components

No.	Description
1	Good Teamwork and Presentation of Documents
3	The company has realized the development of Plasma Estates.
4	The company no longer uses pesticides with the active ingredient paraquat dichloride

3.5 Summary of Arising Issues from Public and Auditor Verification



Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> • Karya Mandiri Cooperative • Marga Jaya Cooperative <p>The company provides guidance to farmers with the Farmer Development Program. The program is implemented as an effort to supervise farmers in terms of plasma plantation management. These programs such as fertilization procedures, plant care, appropriate harvesting, provide an understanding of HCV, wildlife, and land fires. In addition, the Company also disseminates understanding regarding the legality of farmers' land such as STDB, SPPL, etc.</p> <p>The price of FFB given to the Cooperative is the price according to the determination of the Jambi Province Plantation Office. So far, there has been no violation of the FFB price provided by the Company. FFB payments are made every month in cash. Payments are made on the 10-15th of every month. In payment, the company also provides an invoice to the cooperative as proof of payment and the invoice explains the FFB price, FFB amount, total price, grading discounts, etc. So far, there have been no complaints from farmers regarding the FFB payments made by the company.</p>	<p>There is no negative issue from Karya Mandiri Cooperative</p>
<p>Environmental Agency of Muaro Jambi Regency.</p> <p>Communication relations between the company and the agency for the past year have been quite good. Currently, all permits related to environmental permits are owned by the company, starting from the Environmental Permit, TPS LB3 Permit, to the LA (Land Application) Permit. In addition, the obligation to report mandatory reports has been carried out in an integrated manner in the RKL-RPL Report which is reported regularly every 6 months which is done online through SIMPEL. Apart from reporting online, the company always submits a physical report to the Muaro Jambi District Environmental Office every 6 months.</p> <p>Over the past year, the agency has never received any reports or issues related to environmental pollution, land fires or land disputes/claims in the company's operational area. Currently, none of the operational areas are located in forest areas. In the past year, there has never been a request for information sent by the agency to the company.</p> <p>Currently the company has obtained PROPER for the 2022/2023 period with a "BLUE" score and the last supervision carried out by the agency was in the 3rd Quarter of 2022. From the results of this supervision there were no bad or significant records that required further verification.</p>	<p>The results of the document review and interviews with management, it is known that the addendum arrangement process has reached the stage of preparing a Cooperation with a 3rd party and has made an agreement to complete the work starting 6 months from the Cooperation agreement which was set on January 5, 2023.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>The company is known to be in the process of submitting several renewals of licensing documents related to the preparation of an Addendum to Andal and RKL-RPL type B to the Regent of Muaro Jambi and DLH of Muaro Jambi Regency. The progress of obtaining the permit is in the stage of preparing an AMDAL addendum with a 3rd party consultant.</p> <p>The company is known to have complied with the provisions for monitoring and managing waste and reporting regularly in accordance with applicable regulations.</p>	
<p>Manpower & Transmigration Agency of Muaro Jambi Regency.</p> <p>Communication relations between the company and the agency for the past year have been quite good. The company currently has a new CLA period which was ratified in January 2023. The existing trade unions are still active in each plantation unit and factory. During the last 2 years, there has never been any industrial relations dispute reported to the Office. The company has also implemented the employment system quite well, starting from the provision of minimum wages, wage scale structures, overtime, BPJS, THR, bonuses and so on.</p> <p>Currently the company still has workers with PKWT status who have been registered with the Department. The PKWT that was used, the information was intended only for additional workers in harvesting activities, so the Office stated that they allowed it on condition that all labor obligations which are the responsibility of the company must be carried out.</p>	<p>There are no issues that require further verification. Especially for PUP, it will be verified again at the time of the next assessment because for now the Office has not carried out PUP at this time and has planned an assessment in May 2023.</p>
<p>Agriculture & Animal Husbandry Agency of Muaro Jambi Regency.</p> <p>Communication relations between the company and the agency for the past year have been quite good. The company still has a valid IUP and has submitted its mandatory reports according to the specified timeframe. Mandatory reports such as Plantation Business Development Reports, Fire Reports and other reports. At present, none of the company's operational areas are included in the forest area and there are no more Indigenous peoples who still live in the villages around the company (because the majority of village people are mixed with immigrant/heterogeneous ethnic groups).</p> <p>The Plantation Business Assessment (PUP) for the next period has not yet been carried out due to obstacles on the part of the Department. The company has submitted verbal requests and notifications to carry out PUP from January to February 2023, but until now a Decree from the Regent of Muaro Jambi has not been issued so the Office has not been able to carry out an assessment.</p>	<p>There are no negative issues from the Labor Union PUK</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
However, this has been targeted by the Department in May 2023 to carry out PUP as soon as possible.	
<p>National Land Agency of Muaro Jambi Regency.</p> <p>Since the public consultation activity was carried out on April 11, 2023, until the audit activity was completed, the Office did not respond whether to be contacted or not by telephone so that the auditor could not carry out public consultation activities and obtain information regarding company legality from the Office.</p>	N/A
<ul style="list-style-type: none"> • Ladang Panjang Village. • Trimulya Village • Sungai Gelam Village <p>During the last year (2022) until the time the audit took place (March 2023) the communication relationship between the company and the village community had been quite good. The company has carried out its role quite well as a partner of the surrounding community, in carrying out operational activities and together to advance the welfare of the surrounding community. Among the things that have been done are establishing cooperation for operational activities (using local contractors), the community is also included in social studies which are carried out regularly, and every request or proposal for assistance submitted by the community always gets a good response.</p> <p>The company also has several CSR programs that have been realized to date, such as providing guidance to KTPA (Fire Care Farmers Group) and routine village road repair activities. In addition, the company has routinely provided outreach related to company policies, code of ethics as well as mechanisms for consultation, communication and complaints/complaints to the surrounding community. During 2022 there were no incidents or issues related to land claims or disputes between the community and the company.</p>	There are no issues that require further verification.
<p>PT Putra Empat Zheed (CPO/Kernel Transporter)</p> <ul style="list-style-type: none"> • Communication with the company went well. • Both parties and each party have signed a copy of the contract. • Contractor payments are made in accordance with the time set out in the contract. • The company routinely evaluates contractors every month. • Contracts are made based on tenders. <p>OHS is the responsibility of the contractor, including BPJS</p>	There are no issues/events/complaints that require further verification by the auditor.
<p>Workers Union of LPE & LPF (PUK SPSI)</p> <ul style="list-style-type: none"> • SP3 SPSI LPE has been registered with the Manpower Office as evidenced by the Proof of Trade Union Registration document. 	

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> • Have a PKB with an active validity period. • There are still casual daily workers who are contract workers from contractors, who work as harvesters. • The minimum wage imposed follows the local regional minimum wage. • PPE is given routinely every 6 months, and workers understand the mechanism for replacing damaged PPE. So far, there have been no issues related to PPE from the company. • Workers have understood the mechanism for submitting complaints related to the condition of housing infrastructure such as complaints related to clean water. • All registered workers are known to have been registered with BPJS Health and Employment. • Workers do not fully understand the criteria for increasing the working class. • Some workers do not understand the mechanism for submitting overtime. • It is known that the company has never terminated work rights in the past 2 years. • The traction premium for the past 10 years has not experienced any change or increase. 	<p>There are no negative issues that need further verification. All issues that need further clarification have been verified by the company and explained in more detail in the related indicators.</p>
<p>Gender Committee</p> <ul style="list-style-type: none"> • The gender committee has never received complaints or complaints related to acts of harassment, violence, gender discrimination, or complaints related to domestic violence. • The company monitors menstruation days and pregnancy checks to ensure that no workers who are pregnant or breastfeeding work with chemicals. • There is an identification of the needs of young mothers, for mothers who have just given birth or are still breastfeeding toddlers. • There have been no issues related to harassment, violence or gender discrimination in the past 2 years. 	<p>There are no issues/events/complaints that require further verification by the auditor.</p>
<p>Contractor (CV Artha Citra Lestari)</p> <ul style="list-style-type: none"> • The contractor has received socialization from PT BGR regarding Business Ethics, compliance with the use of PPE, environmental policies, and compliance with labor regulations. • The company has registered employees for the Employment BPJS program, but the realization is gradual. • PPE is provided by the contractor and monitored by PT BGR, besides that the contractor also routinely sends monitoring of compliance with regulations. • So far there have been no complaints related to either payment or cooperation that has been established. • The company preparing the work contract has involved both parties in the agreement. 	<p>There are no issues/events/complaints that require further verification by the auditor.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> Contract pricing has been agreed upon by both parties, and implementation of the billing mechanism until payment is understood by the working parties. So far there have never been any problems with payments. 	

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 Bahari Gembira Ria Head of Sustainability</p>  <p><u>Alagendran Maniam</u> Thursday, 13 July 2023</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Moh Arif Yusni</u> Thursday, 13 July 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	Karya Mandiri Cooperative	Muaro Jambi Regency	-	Direct Interview	11 April 2023	✓	
2	Marga Jaya Cooperative	Muaro Jambi Regency	-	Direct Interview	11 April 2023	✓	
3	Environmental Agency of Muaro Jambi Regency.	Muaro Jambi Regency	-	Via Telephone	11 April 2023	✓	
4	Manpower & Transmigration Agency of Muaro Jambi Regency.	Muaro Jambi Regency	-	Via Telephone	11 April 2023	✓	
5	Agriculture & Animal Husbandry Agency of Muaro Jambi Regency.	Muaro Jambi Regency	-	Via Telephone	11 April 2023	✓	
6	National Land Agency of Muaro Jambi Regency.	Muaro Jambi Regency	-	Via Telephone	11 April 2023		✓
7	Ladang Panjang Village.	Muaro Jambi Regency	-	Via Telephone	11 April 2023	✓	
8	Trimulya Village	Muaro Jambi Regency	-	Direct Interview	11 April 2023	✓	
9	Sungai Gelam Village	Muaro Jambi Regency	-	Via Telephone	11 April 2023	✓	
10	Contractor CV Arta Citra Lestari	Muaro Jambi Regency	-	Via Telephone	11 April 2023	✓	
11	Contractor PT Putra Empat Zheed	Muaro Jambi Regency	-	Via Telephone	11 April 2023	✓	
12	PUK SPSI PT Bahari Gembira Ria	Muaro Jambi Regency	-	Via Telephone	11 April 2023	✓	
13	Gender committee	Muaro Jambi Regency	-	Via Telephone	11 April 2023	✓	
14	Ladang Panjang Factory (14 workers)						
15	Ladang Panjang Estate (17 Workers)	Muaro Jambi Regency	-	Direct Interview	11 April 2023	✓	
16	Aliansi Masyarakat Adat Nusantara	Jakarta	rumahaman@cbn.net.id	Via email	04 April 2023		✓
17	Wahana Lingkungan Hidup Indonesia	Jakarta	informasi@walhi.or.id	Via email	04 April 2023		✓
18	World Wide Fund	Jakarta	wwf-indonesia@wwf.or.id	Via email	04 April 2023		✓
19	Sawit Watch	Bogor	info@sawitwatch.or.id	Via email	04 April 2023		✓

Appendix 2. Assessment Program

DATE	10 th – 15 th April 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 10 April 2023		
09.00 – 10.00	JAKARTA → Jambi	All Auditor
11.00 – 14.00	Jambi → PT Bahari Gembira Ria	
15.00 – 16.00	Opening meeting <ul style="list-style-type: none">Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)	All Auditor
16.00 – 17.00	<ul style="list-style-type: none">Verification of Basic Information Mill and EstateConfirmation of Time Bound PlanReview of Partial CertificationVerification result of previous assessment	All Auditor
Tuesday, 11 April 2022		
08.00 – 12.00	Public Consultation <ul style="list-style-type: none">Public consultation with stakeholder to relevant agency in Muaro Jambi RegencyStakeholder consultation to affected communities surrounding the plantations and previous land owner// Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier and scheme smallholders	RIU MAY / OCT HEN / BEN
12.00 – 14.00	<ul style="list-style-type: none">Break	
14.00 – 16.15	<ul style="list-style-type: none">Document review and completing audit checklist.	All Auditor
16.15 – 17.00	<ul style="list-style-type: none">Presentation of Daily Progress.	
Wednesday, 12 April 2023		
08.00 – 12.00	Field Observation to Ladang Panjang POM: <ul style="list-style-type: none">Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO)Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond)Implementation of Employment Procedure and Mechanism Aspect	RIU MAY / OCT HEN/BEN

DATE	10 th – 15 th April 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	<ul style="list-style-type: none"> Verification of stakeholder consultation result and field visit. Document review and completing audit checklist. 	All Auditor
16.30 – 17.00	Presentation of Daily Progress	All Auditor
Thursday, 13 April 2023		
08.00 – 12.00	Field Observation to Ladang Panjang ESTATE Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). 	MAY/HEN BEN / OCT RIU
12.00 – 14.00	<ul style="list-style-type: none"> Break 	
14.00 – 16.30	<ul style="list-style-type: none"> Verification of stakeholder consultation result and field visit. Document review and completing audit checklist. 	All Auditor
16.30 – 17.00	Presentation of Daily Progress	All Auditor
Friday, 14 April 2022		
07.30 – 09.00	Internal discussion by auditor team preparing for Closing Meeting	All Auditor
09.00 – 11.00	Closing Meeting <ul style="list-style-type: none"> Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timelie of CAR's, Conclusion) Comments, Responses and Questions 	
14.00 – 17.00	Site → Jambi	
Saturday, 15 April 2022		
15.00 -	Jambi → JAKARTA	All Auditor