

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

**[✓] Initial Certification**

Name of Management Organization : **PT PRIMA ALUMGA subsidiary of Kuala Lumpur Kepong Bhd**  
 Plantation Name : **Anugerah Estate, Bintang Estate and Ceria Estate.**  
 Location : Village of Sungai Cambai and Sungai Sidang, Sub District of Mesuji Timur and Rawa Jitu Utara, District of Mesuji, Province of Lampung, Indonesia.  
 Certificate Code : **MUTU-RSPO/187**  
 Date of Initial Registration : 04 August 2023  
 Date of Certificate Issue : 04 August 2023      Date of License Issue : 04 August 2023  
 Date of Certificate Expiry : 03 August 2028      Date of License Expiry : 03 August 2024

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved by
IC	12-16 June 2023	Moh. Arif Yusni (Lead Auditor), Rizki Tanaya, Alfiany Sukmawati, and Sentot Adi Subandono	Harso Yuli Antena	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
IC	04 August 2023

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 on MaASA-1.2h 12<sup>th</sup>, 2014 with registration number *ASI-ACC-055*

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Figure 1. Location Map of PT Prima Alumga

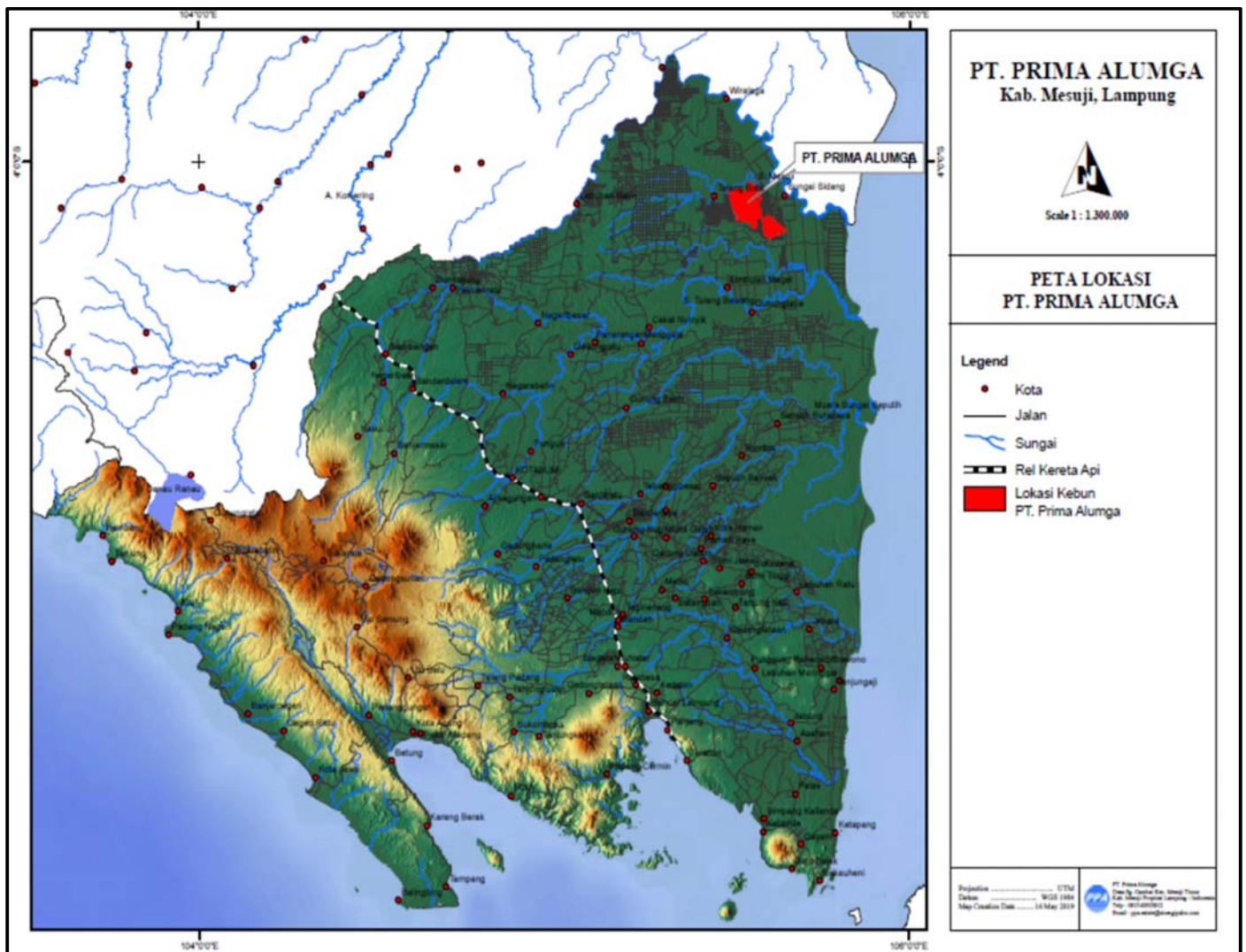
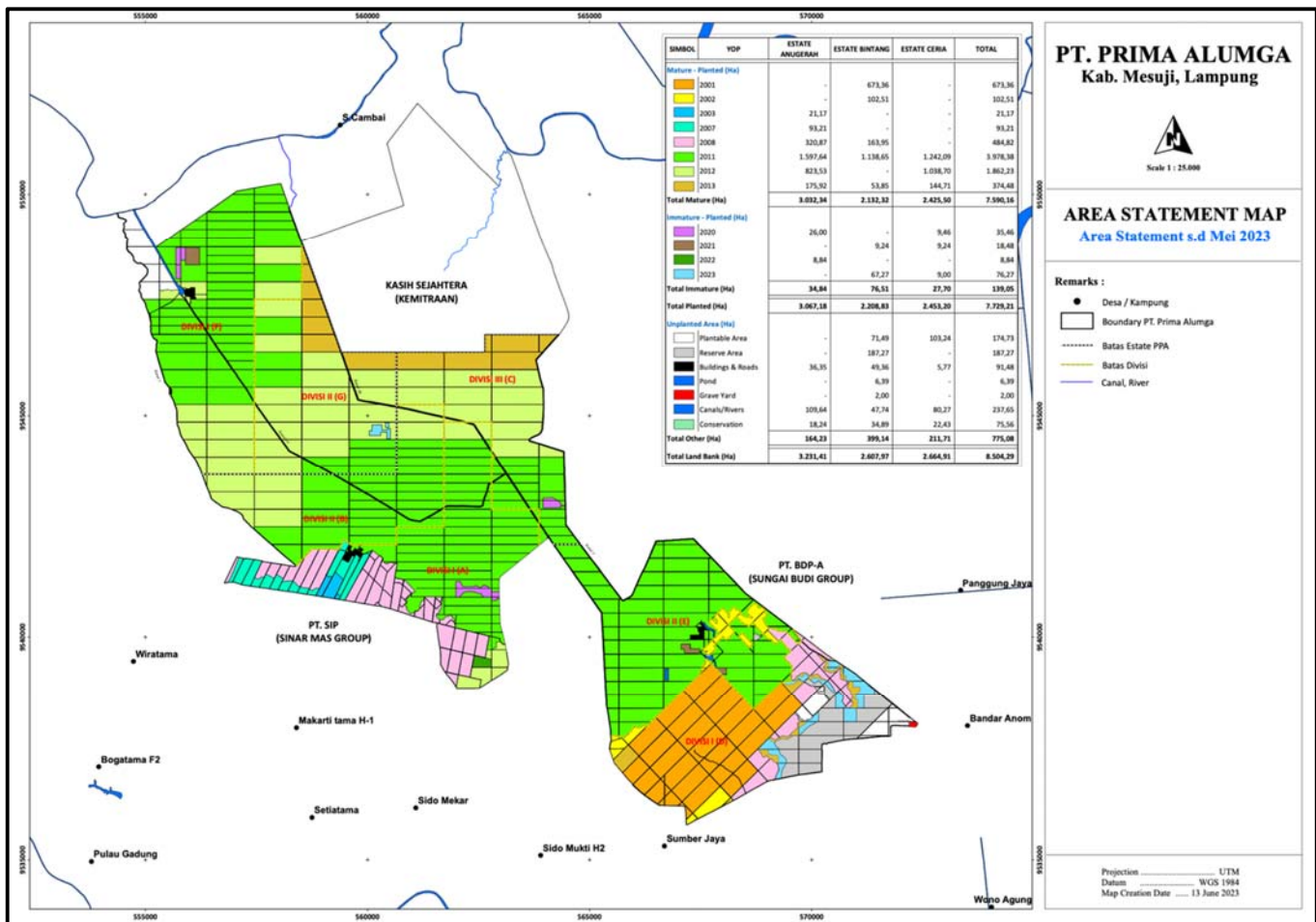


Figure 2. Operational Map of PT Prima Alumga



**Abbreviations Used**

ALS	:	Assessor Licensing Scheme
ASA	:	Annual Surveillance Assessment
AMDAL	:	<i>Analisis Manajemen Dampak Lingkungan</i>
BOD	:	Biological Oxygen Demand
BKSDA	:	<i>Balai Konservasi Sumber Daya Alam</i> (Nature Conservation Agency; Indonesia)
BPJS TK and KES	:	<i>Badan Penyelenggara Jaminan Sosial Tenaga Kerja dan Kesehatan</i> / Social Security Agency
BPN	:	<i>Badan Pertanahan Nasional</i>
CD	:	Community Development
CH	:	Certificate Holder
CITES	:	Convention on International Trade in Endangered Species
CKP	:	Central Kalimantan Project
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
DELH	:	<i>Dokumen Evaluasi Lingkungan Hidup</i>
DLH	:	<i>Dinas Lingkungan Hidup</i>
DPMPSTP	:	<i>Dinas Penanaman Modal dan Permodalan Terpadu Satu Pintu</i>
EBA	:	Empty Fruits Bunch
EFB	:	Empty Fruit Bunch
EIA	:	Environment Impact Assessment
EMU	:	Ecological Management Unit
FFA	:	Free Fatty Acid
FFB	:	Fresh Fruit Bunch
FGD	:	Forum Group Discussion
FPIC	:	Free, Prior, Informed and Consent
GHG	:	Green House Gas
GIS	:	Geographic Information System
HCS	:	High Carbon Stock
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Rights)
IPM	:	Integrated Pest Management
IUP	:	<i>Izin Usaha Perkebunan</i> (Plantation Permit)
KER	:	Kernel Extraction Rate
KKP	:	<i>Karunia Kencana Permaisejati</i>
LSU	:	Leaf Sampling Unit
LTA	:	Lost Time Accident
LUCA	:	Land Use Change Analysis
MSDS	:	Material Safety Data Sheet
OER	:	Oil Extraction Rate
OFI	:	Opportunity for Improvement
OHS	:	Occupational Health and Safety
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> / OHS Committee
PAUD	:	<i>Pendidikan Anak Usia Dini</i>
PIC	:	Person in Charge
PK	:	Palm Kernel
POM	:	Palm Oil Mill

POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PR	:	Public Relation
RKL-RPL	:	Rencana Kelola Lingkungan dan Rencana Pemantauan Lingkungan
RTE	:	Rare, Threatened, and Endangered
SCCS	:	Supply Chain Certification Standard
SDN	:	<i>Sekolah Dasar Negeri</i>
SIA	:	Social Impact Assessment
SIMPEL	:	Sistem Pelaporan Elektronik
SMPN	:	<i>Sekolah Menengah Pertama Negeri</i>
SOP	:	Standard Operating Procedure
SSU	:	Soil Sampling Unit
TTE	:	Tanda Terima Elektronik
UKL-UPL	:	Upaya Kelola Lingkungan dan Upaya Pemantauan Lingkungan
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

<b>1.0</b>	<b>SCOPE OF THE CERTIFICATION ASSESSMENT</b>		
<b>1.1</b>	<b>Assessment Standard Used</b>		
		<ul style="list-style-type: none"> <li>Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020.</li> <li>RSPO Certification Systems for Principles &amp; Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.</li> </ul>	
<b>1.2</b>	<b>Organisation Information</b>		
1.2.1	Organization name listed in the certificate	PT Prima Alumga	
1.2.2	Contact person	Jason Foong	
1.2.3	Organisation address and site address	<b>RSPO registered Company:</b> Wisma Taiko, No 1 Jalan SP Seenivasagam Ipoh/Perak Darul Ridzuan, Malaysia 30000.  <b>Liaison Office:</b> Kompleks Pertokoan Taman Anggrek Blok B2 – B5 Jl. Tuanku Tambusai, Pekanbaru, Riau, Indonesia.	
1.2.4	Telephone	+6221 – 65310437	
1.2.5	Fax	+6221 – 65310746	
1.2.6	E-mail	<a href="mailto:jason.foong@klk.com.my">jason.foong@klk.com.my</a>	
1.2.7	Web page address	<a href="http://www.klk.co.id">www.klk.co.id</a>	
1.2.8	Management Representative who completed the application for certification	Jason Foong	
1.2.9	Registered as RSPO member	1-0014-04-000-00, member since 17 October 2004	
<b>1.3</b>	<b>Type of Assessment</b>		
1.3.1	Scope of Assessment and Number of Management Unit	Anugerah Estate, Bintang Estate and Ceria Estate.	
1.3.2	Type of certificate	Single	
<b>1.4</b>	<b>Locations of Mill and Plantation</b>		
1.4.1	<b>Location of Mill</b>		
	<b>Name of Mill</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude      Longitude</b>
	-	-	-      -
1.4.2	<b>Location of Certification Scope of Supply Base</b>		
	<b>Name of Supply Base</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude      Longitude</b>
	Anugerah	Village of Sungai Cambai Sub District of Mesuji Timur, District of Mesuji, Province of Lampung, Indonesia	S 4° 08' 38.8"      E 105° 32' 16.1"



	Bintang	Village of Sidang Gunung Sub District of Mesuji Timur, District of Mesuji, Province of Lampung, Indonesia		S 4° 09' 34.8"	E 105° 36' 31.3"
	Ceria	Village of Sungai Cambai Sub District of Mesuji Timur, District of Mesuji, Province of Lampung, Indonesia		S 4° 05' 28.9"	E 105° 30' 15.3"
1.5	Description of Area Statement				
1.5.1	Tenure				
	• State			8,504.29 Ha	
	• Community			- Ha	
	Total				
1.5.2	Area Statement				
	Description	Anugerah Estate	Bintang Estate	Ceria Estate	TOTAL (Ha)
	Total area	3,231.41	2,607.97	2,664.91	8,504.29
	Mature Area	3,032.34	2,132.32	2,425.50	7,590.16
	Immature Area	34.84	76.51	27.70	139.05
	Plantable Area	-	71.49	103.24	174.73
	Reserve Area	-	187.27	-	187.27
	Infrastructure	36.35	57.75	5.77	99.87
	Canals / Rivers	109.64	47.74	80.27	237.65
	HCV Area	18.24	34.89	22.43	75.56
1.6	Planting Year and Cycles				
1.6.1	Age profile of planting year				
	Planting Year	Anugerah Estate	Bintang Estate	Ceria Estate	TOTAL (Ha)
	2001	-	673.36	-	673.36
	2002	-	102.51	-	102.51
	2003	21.17	-	-	21.17
	2007	93.21	-	-	93.21
	2008	320.87	163.95	-	484.82
	2011	1,597.64	1,138.65	1,242.09	3,978.38
	2012	823.53	-	1,038.70	1,862.23
	2013	175.92	53.85	144.71	374.48
	Mature Area	3,032.34	2,132.32	2,425.50	7,590.16
	2020	26.00	-	9.46	35.46
	2021	-	9.24	9.24	18.48
	2022	8.84	-	-	8.84
	2023	-	67.27	9.00	76.27
	Immature Area	34.84	76.51	27.70	139.05
	Total	3,067.18	2,208.83	2,453.20	7,729.21
1.6.2	New Planting area after January 2010			Ha	
1.6.3	Planting Cycle			1 <sup>st</sup> Cycle	
1.7	Description of Mill and Supply Base				



1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	*The scope of certification are estate without mill						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (ton/yr)	Yield (ton/ha/yr)	Supplied to Mill	
						FFB (ton/year)	%
	Anugerah	3,231.41	3,032.34	72,392.89	23.87	-	-
	Bintang	2,607.97	2,132.32	60,336.14	27.43	-	-
	Ceria	2,664.91	2,425.50	56,923.09	23.47	-	-
	TOTAL	8,504.29	7,590.16	189,652.12	24.77	-	-
	*Production data source from 12 months before assessment (June 2022 – May 2023)						
1.7.3	FFB description from other source						
	Name of sources/Organization (RSPO certified / non-certified)	Type of Organization	Number Of Smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tones/year)		
	-	-	-	-	-		
	-	-	-	-	-		
	-	-	-	-	-		
	TOTAL						
1.7.4	Product categories		FFB				
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume		
	FFB Processed						
	CPO Production						
	Palm Kernel (PK) Production						
	*Will be verified on the next assessment						
1.8.2	Product selling						
	Type of selling product		Actual selling product for last year				
	CSPO sold as RSPO certified product						
	CSPK sold as RSPO certified product						
	CSPO sold under another scheme						
	CSPK sold under another scheme						
	CSPO sold as conventional						
	CSPK sold as conventional						
	*Will be verified on the next assessment						
1.8.3	Estimate of Certified FFB Claim						
	Name of Estate(s)	Total Area (Ha)	Production Area (Ha)	FFB (tones/year)	Yield (tones/ha/year)		

Anugerah	3,231.41	3,032.34	76,000.00	25.06
Bintang	2,607.97	2,132.32	63,000.00	29.55
Ceria	2,664.91	2,425.50	59,000.00	24.32
<b>TOTAL</b>	<b>8,504.29</b>	<b>7,590.16</b>	<b>198,000.00</b>	<b>26.09</b>

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

**1.8.4 Estimate of Certified Palm Product Claim**

Name of Mill	Capacity (tones/ hour)	FFB Processed (tones/year)	CPO		Palm Kernel		Supply Chain Module
			Out put (tones)	Extraction (%)	Out put (tones)	Extraction (%)	

*\*The scope of certification are estate without mill*

**1.9 Other Certifications**

ISO 9001:2008	-
ISO 14001: 2004	-
OHSAS 18001:2007	-
ISCC	-
Others	
ISPO	MUTU-ISPO/133

**1.10 Time Bound Plan**
**1.10.1 Time Bound Plan for Other Management Units**

MANAGEMENT UNIT		LOCATION	Coverage Area (Ha)	Time Bound	Status
P O M	Estate (Supply Base)				
INDONESIA					
Berau POM	Malindomas Perkebunan	Berau, Kalimantan Timur	7,971	2019	Certified
	Hutan Hijau Mas	Berau, Kalimantan Timur	7,288	2019	Certified
Jabontara POM	Jabontara Eka Karsa	Berau, Kalimantan Timur	14,086	2017	Certified
PBJ POM	Putra Bongan Jaya	Kutai Barat, Kalimantan Timur	11,602	2022	certified
MAP POM	Mulia Agro Permai	Baamang, Kalimantan Tengah	9,056	2019	Certified
	Menteng Jaya Sawit Perdana	Mentaya Hilir Utara, Kalimantan Tengah	2,384	2023	-
KMA POM	Karya Makmur Abadi	Mentaya Hulu, Kalimantan Tengah	13,127	2019	Certified
Steelindo Wahana Perkasa POM	Steelindo Wahana Perkasa	Belitung, Bangka Belitung	14,065	2012	Certified 1 January 2015
	Bumi Makmur Sejahtera Jaya		364	2023	Uncertified

Parit Sembada POM	Parit Sembada	Belitung, Bangka Belitung	3,990	2013	Certified 2016
	Alam Karya Sejahtera	Belitung, Bangka Belitung	6,012	2013	Certified 2016
Mandau POM	Mandau	Bengkalis, Riau	14,799	2012	Certified 2012
Nilo POM 1	Koperasi Petani Sejahtera	Pelalawan, Riau	540.95	2022	Certified
	Koperasi Karya Mitra		100.05	2022	Certified
Nilo POM 2	Nilo Timur	Pelalawan, Riau	6,681	2014	Certified
	Nilo Barat	Pelalawan, Riau	6,179	2014	Certified
	Ladang Mutiara	Pelalawan, Riau	1,363	2019	Certified
	Smallholder PT Adei Plantation – NILO Complex	Pelalawan, Riau		2018	Certified
Tapung Kanan POM	Sekarbumi Alamlestari	Kampar, Riau	6,200	2012	Certified 2013
	Koperasi Tani Sahabat Lestari (Smallholder)	Kampar, Riau	1,294	-	Refuse to take a part RSPO process.
Stabat POM	Basilam	Langkat, Sumatera Utara	2,337	2014	Certified 2017
	Gohor Lama	Langkat, Sumatera Utara	3,307	2014	Certified 2017
	Padang Brahrang	Langkat, Sumatera Utara	2,024	2014	Certified 2017
	Tanjung Beringin	Langkat, Sumatera Utara	3,936	2020	Certified
Tanjung Keliling POM	Bekiun	Langkat, Sumatera Utara	2,979	2014	Certified 2020
	Maryke	Langkat, Sumatera Utara	2,827	2014	Certified 2020
	Bukit Lawang	Langkat, Sumatera Utara	1,482	2014	Certified 2020
	Tanjung Keliling	Langkat, Sumatera Utara	2,360	2014	Certified 2020
Sinergi POM	Kebun Pertama	Kutai Timur, Kalimantan Timur	10,104	2024	Uncertified
	Kebun Belidan	Kutai Timur, Kalimantan Timur		2024	Uncertified
	Kebun Manubar	Kutai Timur, Kalimantan Timur		2024	Uncertified
	Kebun Multi	Kutai Timur, Kalimantan Timur	3,255	2024	Uncertified
	Kebun Karya	Kutai Timur, Kalimantan Timur	2,928	2024	Uncertified
	Kebun Bakti	Kutai Timur, Kalimantan Timur	1,884	2024	Uncertified
IPS POM	Kebun IPS	Kutai Timur, Kalimantan Timur	3,556	2024	Uncertified

	Prima POM	Kebun Prima	Bulungan, Kalimantan Utara	7,731	2024	Uncertified
		Kebun Bahagia	Bulungan, Kalimantan Utara	1,310	2024	Uncertified
		Kebun Permai 1	Bulungan, Kalimantan Utara	1,017	2024	Uncertified
		Kebun Permai 2	Bulungan, Kalimantan Utara	3,778	2024	Uncertified
	PBJ POM	Kebun PT Putra Bongan Jaya	Kutai Barat, Kalimantan Timur	11,602	2022	Certified
	PWS POM	Kebun Pasir Salak	Musi Banyuasin, Sumatera Selatan	5,105	2023	Certified
		Kebun Pangkor	Musi Banyuasin, Sumatera Selatan	4,697	2023	Certified
		Kebun Grik	Musi Banyuasin, Sumatera Selatan	5,269	2023	Certified
	No POM yet	Kebun Anugerah	Mesuji, Lampung	3,231	2024	Uncertified
		Kebun Bintang	Mesuji, Lampung	2,608	2024	Uncertified
		Kebun Ceria	Mesuji, Lampung	2,674	2024	Uncertified
		Scheme smallholders	Mesuji, Lampung		2027	Uncertified
	Segah POM	Kebun Satu Sembilan Delapan	Berau, Kalimantan Timur	5,676	2022	Certified
		Koperasi Perkebunan Sawit Gunung Sari Mandiri		488	2022	Certified
		Koprasi Sawit Mekar Sejahtera		1,222	2022	Certified
		Koperasi Perkebunan Sawit Labasari		1,461	2022	Certified
		Kopreasi Mitra Mandiri		1,018	2022	Certified
		Koperasi Hidup Bersama		759	2022	Certified
		Kebun Tekukur Indah		1,497	2025	Uncertified
	<b>PENINSULAR MALAYSIA</b>					
	Batu Lintang POM	Pelam	Kulim, Kedah	2,526	2012	Certified 2013
		Batu Lintang	Serdang, Kedah	2,355	2012	Certified 2013
		Subur	Batu Kurau, Perak	1,290	2013	Certified 2013
		Ghim Khoon	Kulim, Kedah	434	2012	Certified 2013
	Kekayaan POM	Kekayaan	Paloh, Johor	4,436	2011	Certified
		Landak	Paloh, Johor	4,451	2011	Certified
		Voules	Tenang, johor	2,977	2011	Certified
		Bandar Tenggara	Bandar Tenggara, Johor	950	2011	Certified
		New Pogoh	Tenang, johor	1,560	2011	Certified
		Fraser	Kulai, Johor	2,932	2011	Certified
		Paloh	Paloh, Johor	2,029	2011	Certified

	Sungai Bekok	Bekok, Johor	636	2011	Certified
	Ban Heng	Pagoh, Muar, Johor	631	2011	Certified
	See Sun	Renggam, Johor	589	2011	Certified
Paloh POM		Paloh, Johor			Outside Crop
Jerang Padam POM	Ayer Hitam	Bahau, Negri Sembilan	2,640	2012	Certified
	Batang Jelai	Rompin, Negri Sembilan	2,162	2012	Certified
	Jeram Padang	Bahau, Negri Sembilan	2,114	2012	Certified
	Kombok	Rantau, Negri Sembilan	1,915	2012	Certified
	Ulu Pedas	Pedas, Negri Sembilan	923	2012	Certified
	Gunung Pertanian	Simpang Durian, Negri Sembilan	686	2012	Certified
	Sungai Kawang	Lanchang, Pahang	1,889	2012	Certified
	Renjok	Telemong, Pahang	1,578	2012	Certified
	Tuan	Telemong, Pahang	1,353	2012	Certified
Tanjung Malim POM	Tanjung Malim	Tanjung Malim, Perak	1,544	2013	Certified 2013
	Kerling	Kerling, Selangor	619	2013	Certified 2013
	Sungai Gapi	Serendah, Selangor	603	2013	Certified 2013
	Bukit Kato				Certified 2013
	Kampar				Certified 2013
Tuan Mee POM	Tuan Mee	Sungai Buloh, Selangor	1,556	2012	Certified 2013
Kuala Pertang POM	Kerila	Tanah merah, Kelantan	2,191	2013	Certified 2014
	Pasir Gajah	Kuala Krai, Kelantan	2,107	2013	Certified 2014
	Sungai Sokor	Tanah Merah, Kelantan	1,603	2013	Certified 2014
Changkat Chermin POM	Lekir	Manjung, Perak	3,332	2012	Certified 2013
	Changkat Chermin	Manjung, Perak	2,540	2012	Certified 2013
	Raja Hitam	Manjung, Perak	1,497	2012	Certified 2013
	Allagar	Trong, Perak	805	2013	Certified 2013
	Glenealy	Parit, Perak	1,059	2013	Certified 2013
	Serapoh	Parit, Perak	936	2013	Certified 2013

		Kuala Kangsar	Padang Rengas, Perak	843	2013	Certified 2013
SABAH, MALAYSIA						
Pinang POM	Jatika	Tawau, Sabah	3,508	2009	Certified 2009	
	Sigalong	Tawau, Sabah	2,864	2009	Certified 2009	
	Pangeran	Tawau, Sabah	2,855	2009	Certified 2009	
	Pinang	Tawau, Sabah	2,420	2009	Certified 2009	
Mill II	Pang Burong	Tawau, Sabah	2,548	2009	Certified 2009	
	Sri Kunak	Tawau, Sabah	2,770	2009	Certified 2009	
	Tundong Estate	Tawau, Sabah	2,155	2009	Certified 2009	
	Ringlet	Tawau, Sabah	1,834	2009	Certified 2009	
Pinang	Pinang	Tawau, Sabah	2,420	2009	Certified 2009	
	Tundong		2,155	2009	Certified 2009	
	Ringlet		1,834	2009	Certified 2009	
Lungmanis POM	Lungmanis	Lahad Datu, Sabah	1,656	2010	Certified 2010	
	Sungai Silabukan	Lahad Datu, Sabah	2,654	2010	Certified 2010	
	Rimmer	Lahad Datu, Sabah	2,730	2010	Certified 2010	
	Tungku	Lahad Datu, Sabah	3,418	2010	Certified 2010	
	Bukit Tabin	Lahad Datu, Sabah	2,916	2010	Certified 2010	
Bornion POM	Bornion	Kinabatangan, Sabah	3,233	2010	Certified 2010	
	Segar Usaha	Kinabatangan, Sabah	2,792	2010	Certified 2010	
LIBERIA						
Palm Bay Mill	Palm Bay Estate	Liberia	13,007	2023	Uncertified	
*KLK Time Bond Plan has been updated in November 2022 and develop by sustainability team Some changes year of TBP have been approved by RPSO on 15 November 2022  Here's the remarks related to uncertified unit:						

	Country/Region	Management Unit	RSPO Certification Timeline	Remarks
	Indonesia	PT Bumi Makmur Sejahtera Jaya	Y2025	<i>Hak Guna Usaha</i> (HGU) is still pending
		PT Menteng Jaya Sawit Perdana	Y2023	Hak Guna Usaha (HGU) is still pending
		Tekukur Indah	Y2025	The unit is managed by KLK and has just been recently added into KLK's RSPO certification program. However, development has not started.
	Malaysia	Mill 1	-	The unit is closed, and its certificate will not be renewed during the next surveillance audit.
1.10.2	<b>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</b>			
	the progress of scheme smallholders will be verified after PT Prima Alumga Obtained RSPO Certificate			



<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>IC</b>	<p>1. <b>Moh. Arif Yusni (Lead Auditor)</b>. Bachelor of Agriculture from the Department of Plant Pests and Diseases, Faculty of Agriculture, Padjadjaran University, Bandung. Trainings attended include ISPO Lead Auditor, General AK3, RSPO Lead Auditor and ISO 9001:2008 Quality management system certification. Has 2 years working experience as a plantation Operational Staff in a private oil palm plantation company in Indonesia. In this audit activity, an assessment is carried out on aspects of land legality and land disputes, transparency and supply chain systems.</p> <p>2. <b>Rizki Tanaya (Auditor)</b>. Indonesian Citizen, Bachelor of Agriculture, Department of Agricultural Socio-Economy, Padjadjaran University. The trainings that have been attended include Training and Refreshment of the New ISPO Auditor ISPO Ministry of Agriculture 38 of 2020, RSPO SCCS Auditor Training, RSPO P&amp;C Lead Auditor Training, ISO 9001:2015 Lead Auditor Training, General OHS Expert Training, ISO 19011:2018, ISO 17021 :2015, ISO 17065:2012, ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, ISO 50001:2018, FSC CoC, BAP, SEDEX/SMETA, and Global GAP. Has conducted several audit activities on environmental, conservation, Best Management Practices, OHS, Labor and Social aspects. In this audit activity verification is carried out on social aspects, welfare and employee transparency.</p> <p>3. <b>Sentot Adi Subandono (Auditor)</b>. Indonesia citizen, Bachelor of Agriculture, Department of Agricultural Cultivation. He has five years of experience working since 2005 as Plantation Operational Staff and nine years as Internal Auditor in private oil palm plantations in Indonesia. The training that has been attended includes the Basic Management Development Program of Palm Oil Plantation, Use of Limited Pesticides, Best Practices in Internal Auditing, Fraud Auditing: Prevention, Detection, and Investigation, Operational Risk Approach in Internal Auditing, General Occupational Health and Safety Expert, ISPO Auditor Training in 2016, ISO 9001: 2015, RSPO Lead Auditor Training in 2020. During this assessment, verified the aspects of Best Management Practices and OHS Aspect.</p> <p>4. <b>Alfiany Sukmawati (Trainee Auditor)</b>. Indonesian citizens. Bachelor of Public Health, Department of Environmental Health, University of Indonesia. Has experience working in the field of K3 and the environment for 5 years. Has attended training on AMDAL A &amp; B, OSHAS, ISPO Lead Auditor by LPP, RSPO Lead Auditor by Checkmark, ISO 9001:2015 Lead Auditor, ISO 14001, ISO 17021 Awareness, ISO 17065 Awareness, ISO 9001 Awareness, ISO 45001 Awareness, and Awareness ISO 19011. Has participated in several simulations of audit activities related to the certification system for sustainable oil palm plantations with environmental aspects. In this audit activity, an assessment was made for Environmental, Social, Conservation and GHG aspects.</p>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
<b>IC</b>	<p>Number of auditors: 3 auditor and 1 Trainee</p> <p>Number of days for IC audit: 4.5 days</p> <p>Number of working days for IC audit: 13.5 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>IC</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the <b>PT Prima Alumga, subsidiary of Kuala Lumpur Kepong Bhd</b> to the requirements of</p> <ul style="list-style-type: none"> <li>• RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20<sup>th</sup> April 2020.</li> <li>• RSPO Certification Systems for Principles &amp; Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.</li> </ul> <p>The scope of certification consists of 3 (three) estate namely Anugerah Estate, Bintang Estate and Ceria Estate.</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 directly observe the sufficiency of implementation on site.</p>

Public Stakeholder Notification was made on MUTU Website and RSPO Website. There is no written negative feedback receive. Stakeholder consultation involved internal and external stakeholders' discussion was 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 discussion, 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 considered in the assessment.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates through teleconference. Fieldworkers were interviewed informally in small groups in the field. Company officials were not present at interview.

Some opportunities for improvement of the results **IC** delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (**ASA-1**). All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **IC**.

The opening meeting was held on 12 June 2023 at 14.00 local time with the participants who attended the opening meeting included the Estate Manager, Support Team from sustainability department and other relevant staff. while the closing meeting will take place on 16 June 2023 at 16.00 local time. attended by the same participants as the opening meeting. Commonly, the audit activities went smoothly with good support from the unit management. The presentation of documents is presented quite well using email or one drive.

The assessment program please find Appendix 2

### 2.2.3

#### Locations of Assessment

##### IC

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

##### Anugerah Estate

- **Temporary Hazardous Waste Storage.** Observation for OHS, waste disposal, and environmental aspects.
- **First Aid Center.** Observation and interview with worker related to clinic condition, OHS, and environmental aspects.
- **Landfill Area.** Observation of domestic waste management.
- **Agrochemical Storage** Observation and interview with worker related to chemical management, OHS, and environmental aspect.
- **Spare part and PPE Storage.** Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.
- **Rinse House.** Observation and interview related work procedure, employment, safety, and environmental aspect
- **Fuel and Oil Storage.** Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.
- **Firefighting Equipment Storage.** Observation and interview with worker related to hazardous waste management, OHS, and environmental aspects.
- **Mixing Area.** Observation and interview related work procedure, employment, safety, and environmental aspect
- **Fertilizer Storage.** Observation and interview with worker related to chemical management, OHS, and environmental aspect.
- **Ex Pesticide Storage Warehouse.** Observation and interview with worker related to chemical management, OHS, and environmental aspect.
- **HCV Canal 1 Block D25.** Observations regarding management of water body areas and HCV attributes.
- **HCV Canal 3 Block I23.** Observations regarding management of water body areas and HCV attributes.

- **Harvest, Division II Block I25.** Field observations and interviews regarding OHS, Employment, Environment and BMP aspects.
- **Spraying, Division II Block J24.** Field observations and interviews related to spraying techniques and OHS aspects and the use of PPE.
- **Fertilization, Division II F25.** Field observations and interviews regarding fertilization techniques and OHS aspects and the use of PPE.
- **Load FFB, Division II H22.** Field observations and interviews related to technical work and OHS aspects and the use of PPE.
- **Owl House, Division I Block B1.** Observe house/nest conditions.
- **Housing area.** Field observations and interviews on housing conditions and environmental aspects.
- **Division II fire watch tower Block I25.** Observation of fire monitoring and control infrastructure facilities.
- **Palm Oil crank, Division II H18.** Field observations and interviews related to technical work and OHS aspects and the use of PPE.
- **HCV Canal 1 Bintang Estate.** Observations regarding management of water body areas and HCV attributes.
- **HCV Canal 3 Bintang Estate.** Observations regarding management of water body areas and HCV attributes.
- **Boundaries Poles No 44, 45, 46 and 47** Field observations to see the boundaries poles, legal aspect and potential land dispute.

### Bintang Estate

- **Harvest, Division II Block N37.** Field observations and interviews regarding aspects of OHS, Employment, Environment and BMP.
- **Spraying, Division II Block K40.** Field observations and interviews related to spraying techniques and OHS aspects and the use of PPE.
- **Mechanical Fertilization, Division II L38.** Field observations and interviews regarding fertilization techniques and OHS aspects and the use of PPE.
- **Housing area.** Field observation of housing conditions and environmental aspects.
- **Manual Slashing.** Field observations and interviews related to technical work and OHS aspects and the use of PPE.
- **Piezometer Benchmark and Subsidence Benchmark. Division II Block L28.** Observations related to peatland management.
- **Boundaries Poles No : 67,66,65,64** Field observations to see the suitability of the coordinates, positions and conditions of the stakes.
- **HCV Canal 1** Observations regarding management of water body areas and HCV attributes.
- **HCV Canal 3** Observations regarding management of water body areas and HCV attributes.
- **Agrochemical Storage** Observation and interview with worker related to chemical management, OHS, and environmental aspect.
- **Spare part and PPE Storage.** Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.
- **Fuel and Oil Storage.** Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.
- **Firefighting Equipment Storage.** Observation and interview with worker related to hazardous waste management, OHS, and environmental aspects.
- **Workshop.** Observation and interview with worker related to workshop activity, OHS, environmental and worker welfare aspect.
- **Pesticide Mixing Area,** Observation related OHS Aspect, workers welfare and etc
- **Rinse House.** Observation and interview related work procedure, employment, safety, and environmental aspect.
- **Housing Area.** Observation related worker facility, OHS, and environmental aspects.
- **Generator House.** Observation and interview with worker related work procedure, OHS, environmental and worker welfare aspect.

<b>Ceria Estate</b> <ul style="list-style-type: none"> <li>• <b>Temporary Hazardous Waste Storage.</b> Observation for OHS, waste disposal, and environmental aspects.</li> <li>• <b>Agrochemical Storage</b> Observation and interview with worker related to chemical management, OHS, and environmental aspect.</li> <li>• <b>Spare part and PPE Storage.</b> Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.</li> <li>• <b>Fuel and Oil Storage.</b> Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.</li> <li>• <b>Firefighting Equipment Storage.</b> Observation and interview with worker related to hazardous waste management, OHS, and environmental aspects.</li> <li>• <b>Workshop.</b> Observation and interview with worker related to workshop activity, OHS, environmental and worker welfare aspect.</li> <li>• <b>Pesticide Mixing Area,</b> Observation related OHS Aspect, workers welfare and etc.</li> <li>• <b>Rinse House.</b> Observation and interview related work procedure, employment, safety, and environmental aspect.</li> <li>• <b>Housing Area.</b> Observation related worker facility, OHS, and environmental aspects.</li> <li>• <b>Generator House.</b> Observation and interview with worker related work procedure, OHS, environmental and worker welfare aspect.</li> <li>• <b>Harvest, Division I Block B13 -21.</b> Field observations and interviews regarding aspects of OHS, Employment, Environment and BMP.</li> <li>• <b>Spraying, Division II Block D20.</b> Field observations and interviews related to spraying techniques and OHS aspects and the use of PPE.</li> <li>• <b>Fertilization Division I B9-10.</b> Field observations and interviews regarding fertilization techniques and OHS aspects and the use of PPE.</li> <li>• <b>Boundaries Poles No 136, 137 and 138</b> Field observations to see the boundaries poles, legal aspect and potential land dispute.</li> </ul>	
<b>2.3</b>	<b>Stakeholder Consultation and Stakeholders Contacted</b>
<b>2.3.1</b>	<b>Summary of stakeholder consultation process.</b>
<b>IC</b>	<p>Summary of stakeholder consultation process for PT Prima Alumga was held by:</p> <ul style="list-style-type: none"> <li>• Public Notification on Website Mutuagung Lestari and RSPO Website on 10 May 2023.</li> <li>• Public consultation with NGOs (by email) such as WWF, WALHI, AMAN, and Sawit Watch on 05 June 2023.</li> <li>• Public consultation meeting with government institution (Environmental Office, Plantation and Agriculture Office, Manpower and Transmigration Office) on 13 June 2023.</li> <li>• Public consultation meeting with communities (Mekartitama Village, Wiratama Village, Sungai Cambai Village, Sungai Sidang Village) on 14 June 2023.</li> <li>• Public consultation meeting with internal stakeholders and contractor 13 – 14 June 2023.</li> </ul> <p>Numbers of input from stakeholders were clarified by PT Prima Alumga.</p>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	<i>Please find appendix 1</i>
<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit ASA 1 will be conducted eight (8) months to twelve (12) months after date of annual license

### 3.0 ASSESSMENT FINDINGS

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

MUTUAGUNG LESTARI has conducted an assessment of PT Prima Alumga subsidiary of Kuala Lumpur Kepong Bhd consisting of three (3) oil palm estates.

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

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

MUTUAGUNG LESTARI found that PT Prima Alumga subsidiary of Kuala Lumpur Kepong Bhd operation complied with the requirements of **RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, endorsed by the RSPO Board of Governors on 12 November 2020 and Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th April 2020**. Therefore, MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is *Issued*.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>		
<b>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.</b>		
<b>1.1.1</b> The unit of certification has a list of information/documents that can be accessed and/or shared with stakeholders such as government agencies and NGOs which is presented in master list of PT Prima Alumga documents which was updated as of November 23, 2022. In the document There are 66 types of documents that can be accessed by stakeholders, including the following: <ul style="list-style-type: none"> <li>• Number of employees and list of basic wages and proof of payment of BPJS</li> <li>• Data of taxes</li> <li>• Environmental documents</li> <li>• Deed of establishment and amendments, area and production data and fertilization application data</li> <li>• Proof of ownership of land rights</li> <li>• HCV identification report</li> <li>• SIA identification report</li> <li>• Community empowerment program reports</li> <li>• Report of the Committee for Occupational Health and Safety (P2K3)</li> <li>• Continuous improvement program document</li> <li>• RSPO and ISPO audit report documents</li> <li>• Human Rights policy document</li> <li>• Complaints and dissatisfaction report.</li> </ul> <p>The list of information contained above is in accordance with the criteria of the RSPO regarding environmental, social and legal issues such as:</p>		



- HCV identification report and Environmental documents for the environmental aspect
- SIA identification report, Community empowerment program report and Human Rights policy document for the social aspect
- Deed of establishment and amendments, area and production data and fertilization application data and Proof of ownership of land rights for the legal issue aspect.

Based on interviews with government agencies and Wiratama Village, they already know the types of documents that can be accessed by the community by requesting with a written or verbal request to the company and Information provided is in Bahasa Indonesian.

### 1.1.2

The unit of certification can show evidence that information has been received in an appropriate form and language related to stakeholder involvement, company rights and obligations that are conveyed to all relevant stakeholders, including:

#### **Compliance with Social and Environmental Regulation**

- RKL-RPL Semester 2 2022 report (No. 142/EXT/PPA/VI/2023) to the Environmental Agency of Mesuji Regency, Lampung Province on 05 June 2023 and evidence of electronic reporting through SIMPEL KLHK with ID TTE: 4365.
- RKL-RPL Semester 1 2022 report to the Environmental Agency of Mesuji Regency, Lampung Province on June 8, 2022, and evidence of electronic reporting through SIMPEL KLHK with ID TTE: 4365.
- Report on Hazardous Waste Management Quarter I 2023 (January-March) with Number 98/EXT/PPA/IV/2023 dated March 11, 2023, to Environmental Agency of Mesuji Regency.
- TTE for Hazardous Waste Management with ID No. 1680750590-769 to Environmental Agency of Mesuji Regency, Environmental Agency of Lampung Province and KLHK.
- Report on the Management and Monitoring of Conservation Areas which also included results of monitoring species for the 2022 period which were reported on 21 February 2023 to the Natural Resources Conservation Agency (BKSDA) of Lampung Province, the Environmental Agency of Mesuji Regency and Lampung Province, and the Office of Lampung Province Plantation.

#### **Compliance with Best Management Practices Regulation:**

- The Plantation Business Development Report for the second semester of 2022 was submitted to the Mesuji Regency Agriculture Office on January 20, 2023.

#### **Compliance with manpower Regulation:**

- Mandatory Employment Report with reporting number 34697.20230605.0001 date of report on 05 June 2023
- 2022 CSR Realization Report
- Report on the Use of Foreign Workers 2023

### 1.1.3

Records regarding requests for information and responses are listed in the 2023 PT Prima Alumga Request for Information & Communication Log Book document. The document informs the letter number, date of letter, and information needed. The company also documents information responses in the form of Responses to Requests for Information & Communication documents. The following are examples of responses to requests for information from stakeholders.

- There is an incoming letter from Makatitama Village. February 27, 2023, regarding the Request for Drilling Assistance. The company then indicated a response to the letter through the Document Application for Proposal/Assistance Approval Form which was submitted to Makatitama Village stakeholders on May 30, 2023.
- There is an incoming letter from Sidang Gunung Tiga Village. April 7, 2023, regarding Application for Grader Heavy Equipment Loan Assistance. The company then showed a response to the letter through the Document Request for Proposal/Assistance Approval Form which was submitted to Sidang Gunung Tiga Village stakeholders on May 5, 2023

Based on interviews with representatives of the Sungai Cambai Village community and the Mesuji Regency Environmental Service, it is known that stakeholders have asked the company for information and the company has responded to the request for information.

### 1.1.4

The company has a procedure for providing information to stakeholders in the SOP document Requesting and Providing Information, Communication and Submission of Complaints SSOP Number 1 Revision 4 which was ratified on 25 October 2021. The document explains the person in charge of receiving information, namely:

- Managers must refer to the "Master List of Documents" regarding information that may be provided to stakeholders. This list must be approved by the General Manager (GM).
- Managers must respond constructively and appropriately to every request. The response letter must be signed by the Manager or authorized personnel and dated for response.
- If necessary, the Manager must seek advice/advice from the General Manager/Public Relations.
- Information requests that can be responded to are about environmental, social and legal issues related to sustainability criteria.
- If the request cannot be fulfilled/answered for certain reasons, for example is confidential, then stakeholders must be notified of the reasons.
- The response period is 14 days. If there is a reason, so that the response time is more than 14 days, then inform stakeholders about this, along with the reason for the delay.
- If a request for information and response is received by telephone, then it is recorded in the Log Book and this book is only signed by the company.

Based on interviews with representatives of Sungai Cambai Village and the Mesuji Regency Environmental Service, it is known that stakeholders know about the mechanism for conveying information.

### 1.1.5

The certification unit has shown the PT Prima Alumga stakeholder list document, updated in June 2023. Based on this document, there are 51 stakeholders related to the company which include Government Stakeholders (province, district, sub-district, and village), other Authorities (TNI/POLRI), Partner Cooperatives, Hospitals, Corporations, Suppliers, NGOs, Internal Stakeholders, Contractors, and Banking. The stakeholder register explains the name, agency/position, location, category, contact person number, and other information. As for the list of landowners previously owned but in a different document among the stakeholder's company, there are heavy equipment contractor, namely PT Sumatera Kalimantan Jaya and FFB transporters namely PT Deffa Citra Lampung.

At the time the audit was carried out, the PT Prima Alumga stakeholder list document shown was in accordance with the actual, such as the contact number of each stakeholder contacted by the auditor as stated in the list. Based on this, it can be concluded that the certification unit has an up-to-date list of contacts and detailed information related to stakeholders and their representatives that are well documented. Auditor has verified randomly to ensure validity during the stakeholder consultation, and this is confirmed during consultations with the stakeholders.

**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 KLK Group Sustainability Policy updated on 30 August 2018 validated by CEO. This policy generally explained that their ethical code adopted from RSPO principle and criteria, here as follows:

- Environmentally appropriate committed by no deforestation, protecting peatlands, zero burning, protecting HCV Area, and reducing the emissions of GHG.
- Social, workplace and communities' welfare by respecting and recognizing the rights in the workplace including respecting employee rights, no forced labor, no child labor, providing safe and healthy workplace, etc. Unit of Certification also committed to respecting the rights of indigenous and local communities and facilitating the inclusion of smallholders into the supply chain.
- Traceable palm oil supply chain by fully trace the sources of FFB supplied by all third-party suppliers.

Furthermore, the certification unit also showed the KLK (Kuala Lumpur Kepong) Group Anti-Corruption Policy (dated 03 August 2020). Commitment to ethical behaviour in all operations and transactions is stated that KLK Group is committed to fostering an anti-corruption culture and to ensuring that its activities and transactions are open, transparent and are conducted in accordance with its policies and the laws which govern its operations in every country in which it operates. As such, all Company Employees and Associated Persons (as defined below) are required to act fairly and with integrity in all of their business dealings and relationships.



Code of conduct written in Bahasa, including integrity code and ethical code in all operations and transactions including business ethics, work ethics and firm commitment in particular matters (conflict of interests, political activities, gifts/ souvenirs, commissions, and bribery prohibitions.

Company has shown socialization related Code of Business Ethics. For example, socialization on February 17, 2023, which was attended by 78 participants.

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

### 1.2.2

Mechanism of monitoring compliance towards company policy and code of conduct of internal and external stakeholders is conducted through several methods, as follows:

- Contractor's statement letter PT Deffa Citra Lampung dated March 10, 2023, which explains that it has not committed acts of corruption, bribery and fraud. Adhere to company business ethics and respect human rights and no discrimination.
- Contractor's statement letter PT Manupak Abadi dated June 12, 2023, which explains that it has not committed acts of corruption, bribery and fraud. Adhere to company business ethics and respect human rights and no discrimination.
- Daily and monthly monitoring by Foreman and Assistant on work quality checking and progress.
- Internal audit RSPO that is conducted annually by internal auditor.

Based on field observation to the estate, it was known that FFB transportation mostly carried out by local contractor. Implementation towards safety and manpower aspect has regularly and evaluate periodically by estate management every month, as presented in about evaluation and recommendation of contractor.

**Status: Comply**

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

### 2.1

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

#### 2.1.1

The certification unit is under the company PT Prima Alumga, in fulfilling compliance, the company has complied with several relevant regulations, namely by having the following documents:

#### **Compliance with Social and Environment Regulation:**

- The Environmental Feasibility Document (AMDAL) was ratified by the AMDAL Commission with Decree Number. 107.1/KOMDAL/II.04/2013 dated 17 April 2013 and based on the Decree of the Mesuji Regent on 12 April 2010 with Number. 800/466/III.06/MSJ/2010 regarding Environmental Documents with the scope of a plantation area of 10,252.43 Ha and a processing plant with a capacity of 45 tons of FFB/hour located in Cambai River and Sidang River, Mesuji Timur and Rawa Jitu Utara Districts, Mesuji Regency, Lampung.
- Addendum to environmental documents due to the addition of an area of 260.52 Ha based on Decree of the Mesuji Regent Number. B/176/I.02/HK/MSJ/2016 dated 9 May 2016 regarding the environmental feasibility of PT Prima Alumga's planned oil palm plantation and palm oil processing factory in Sungai Cambai Village, Sungai Sidang Village and Sidang Gunung Tiga Village, Mesuji Timur Sub-District and Rawajitu Utara Sub-District, Mesuji District.
- Environmental Permit documents for addendum documents based on the Decree of the Mesuji Regent Number. B/177/I.02/HK/MSJ/2016 dated 9 May 2016 concerning environmental permits for planned activities of oil palm plantations and palm oil processing factories of PT Prima Alumga
- Hazardous Waste storage permit based on Decree of the Head of the Investment and *DPMP TSP* No. 660/02/LBBB/IV.14/MSJ/2019 which took effect on 20 August 2019 for 5 (five) years.
- Domestic water permit (*SIPPA*)

#### **Compliance with Best Management Practices Regulation:**

- Minister of Agriculture Regulation no. 01/Permentan/OT.140/1/2007 concerning List of Prohibited and Limited Pesticide Active Ingredients..

- Invasive species refers to the regulations in force: Permen LHK No.P. 94/MENLHK/SEKJEN/KUM.1/12/2016 concerning Invasive Types.
- Not use fire for land clearing.
- The company has used certified seeds.

**Compliance with Legal Regulation:**

In term of legal and permit regulation compliance, company are able to show several documents, such as Location Permit and Land Tenure or Land Use Right (HGU).

**Compliance with Manpower Regulation:**

- Mandatory Manpower Report number 34697.20230605.0001 on behalf of PT Prima Alumga.
- The implementation of the minimum wage in 2023 is in accordance with the Minimum Wage Decree of the Mesuji Regency established by the Governor of Lampung in December 7, 2022.
- Payment of overtime wages to workers in accordance with Government Regulation No. 35 of 2021.
- Implementation of the structure and scale of wages for all levels of workers in accordance with Minister of Manpower Regulation No. 01 of 2017.
- Government Regulations No. 34 of 2021 concerning the use of foreign workers.

**2.1.2**

Procedure of legal requirement which presented in document No: SSOP2, revision 3 dated 24 August 2019 mentioned that Legal Officer has responsibility to arranged and monitored legal related laws and/or regulation. The procedure mentioned that in order to monitor and update of laws and/or regulations, the Legal Officer required to actively check and make coordination with Government Agencies or Institutions. To ensure compliance with law or regulations, the company conducts an internal RSPO audit. 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 was conducted on 23 – 28 January 2023.

Evaluation of law registers for contractors which have been implemented on February 2023 Explanation on contractor compliance is explained in more detail in 2.2.2. In the explanation in indicator 2.2.2, it is known that for now the contractor has not fully complied with all relevant laws and regulations in Indonesia, but the company has made several efforts to ensure that the contractor remains obedient and has targeted clear timelines for its fulfilment. So that all regulatory compliance has been properly monitored and has a clear timeline for compliance.

**2.1.3**

Procedure of legal boundary stakes monitoring and maintenance is presented in SOP No. SSOP4, revision 3 dated 24 August 2019. Procedure mentioned that maintenance was carried out by officers who have been appointed by the Estate Manager. Monitoring the boundaries of the HGU at least once a year.

The company shows the document for monitoring the HGU stake which is carried out every year. The last HGU stake monitoring was carried out in May – June 2023. The report on the inspection and maintenance of the boundary markers has provided complete information regarding the number of stakes, condition of stakes, location of stakes, coordinates of stakes and corrective actions as well as the target time for repairs if there are damaged or missing stakes. In the monitoring report, there are several boundaries pole was not available due to in occupations area.

Field observations to several HGU boundary show that the poles sampled (Anugerah Estate Poles No 44, 45, 46 and 47; Bintang Estate Poles No: 67,66,65,64 and Ceria Estate Poles No 136, 137 and 138) during the audit were available in the field and in well-maintained conditions. Verification using GPS indicates that the pole coordinate is in accordance with the provisions of the land title. Land boundaries with outsiders are clear, such as a large boundary road and trench that borders the HGU area. There is no indication of land use outside the HGU.

<b>2.1.1</b>	<b>Status: Comply</b>
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## **2.2**

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

### **2.2.1; 2.2.2 & 2.2.3**

In monitoring the existence of contractors for plantation and mill activities, company had well-documented the list of contractors, type of business, contact persons, work agreements, and ensuring other matters related to compliance with laws and regulations in Indonesia. During the audit, company has contractors list which is updated on June 2023 and collaborated in FFB transportation and civil and machineries, totalling 9 units.

Managing the contractor, CH has copy of agreement in PT Prima Alumga. CH has shown that there were several separate clauses on the work agreement between CH and contractor related to fulfilling legal obligations in Indonesia. Some of these obligations are related to the registration of workers' health and social security insurance, the provision of minimum wages, the obligation to use PPE, other permits such as tax payment and others. For example, for agreement between two parties, such as:

- Work Agreement Number PPA/CR-EST.11/10/2022 dated 31 October 2022 between PT Prima Alumga and PT Mahesa Sena Santoso for the work of Transporting Fruit Bunches (FFB) at the Ceria Estate. This agreement is valid from 01 November 2022 to 30 September 2023.
- Work Agreement Number PPA/CR-EST.05/10/2022 dated October 1, 2022, between PT Prima Alumga and PT Deffa Citra Lampung for the work of Transporting Fruit Bunches (FFB) at the Anugerah Estate. This agreement is valid from October 1, 2022, to September 30, 2023.
- Work Agreement Number PPA/CR-EST.01/10/2022 dated October 1, 2022, between PT Prima Alumga and PT Sumatra Kalimantan Jaya for the work of washing ditches and renting excavators at the Anugerah Estate, Bintang Estate and Ceria Estate locations. This agreement is valid from October 1, 2022, to September 30, 2023.

Beside example in above, unit certification also showed document such as:

- Salary slips for employees of PT Deffa Citra Lampung for the period May 2023. From the document, it is known that the contractor has paid employee wages in accordance with applicable regulations.
- Work Agreement between PT Deffa Citra Lampung and their workers such work agreement permanent employee dated October 1, 2022.
- Proof of payment for PT Marisman Jaya Abadi BPJS *Ketenagakerjaan* May 2022 period dated May 20, 2023.

To ensure compliance with this clause, the unit of certification always asks for requirements for completeness before the contractor does/starts work. Based on the interviews with representatives of Anugerah Estate, and Ceria Estate contractors, it is known that so far, the company has always educated and provided direction related to sustainable palm oil management policies, including the prohibition of employing minors, child protection, and commitment to comply with applicable laws in Indonesia. Commitment not to hiring employees of human trafficking and forced labor listed in contractor's work agreement signed by each contractor. Based on field observation to Anugerah Estate, it was found that contractor workers who carried out work at the estate were in accordance with the agreements in the work agreement such as the use of PPE and did not employ underage workers.

CH has also shown Contractor Control dated June 5, 2023, which the name document is evaluation of PT Prima Alumga's contractor compliance documents. This document contains result of inspection of contractor that had agreement with PT Prima Alumga, including work environment, PPE, emergency response preparedness, work equipment, and OHS aspects. These results show that contractors have fulfilled requirements of company and regional regulations.

The company has monitored contractors that work with the company, however, at the time of the final inspection there were still contractors who had not fulfilled the relevant legal obligations because they were in the process of fulfilling them, so this created an opportunity for improvement for the company to ensure the fulfillment of relevant legal obligations for all contractors. (OFI)

**Status: Comply**

### 2.3

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

#### 2.3.1; 2.3.2

The company did not receive FFB from direct or indirect supplier.

**Status: Comply**

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

### 3.1

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

#### 3.1.1

The company shows records of plantation business planning, monitoring, and evaluation, including:

##### Long Term Plan (5 years)

Description	Unit	Periode/years				
		2021	2022	2023	2024	2025
Produce Area	Ha	7.658	7.667	7.667	7.702	7.702
FFB Production	Ton	181.959	183.399	187.288	192.069	195.412

PT Prima Alumga's five-year long-term plan is contained in the document "Crops and Production Projections for 5 years (2021-2025)" which was signed by AGM (Assistant General Manager) on 15 December 2021. Several parameters that are estimated include Yield/Harvest Area, Fresh Fruit Bunches (FFB) Production, FFB Prices, FFB Sales, FFB Production Costs, Other Operational Costs and Company Profits.

Based on the description above, it can be concluded that the company can prove that it has a planning record.

#### 3.1.2

Based on a study of area statements, long-term plans and results of interviews with management, there are no plans for replanting from 2021-2026.

At the time the initial audit was carried out, the certification unit had no longer carried out activities to clear and contain oil palm since 2010. Based on document verification revealed that the company was clearing land by mechanical means and not using fire (zero burning). The results of interviews with management, related agencies in Mesuji Regency found that during land clearing several years earlier, PT Prima Alumga carried out land clearing activities by mechanical means (using heavy equipment) and not using fire (zero burning).

#### 3.1.3

To ensure that all plantation and mill operational activities run well and sustainably, the unit of certification annually carries out a Management Review conducted by company leaders. The Management Review functions as control and monitoring of work performance/attainment of results for one year in the plantation. The things reviewed are divided into several sections including the OHS section, internal audit, operations, work performance, achievement of results and other parts as a whole. The last Management Review was conducted on February 3, 2023, to evaluate operational activities, internal audit activities.

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

**Social and Environmental Aspect**

The management unit has developed and implemented an action plan for continuous improvement, and it is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. such as:

- Management and monitoring of fires in company border areas that benefit the community.
- The 2021 until 2022 HCV Management Plan improved in terms of both the quantity and the quality of monitoring.
- Ambient in air quality management and monitoring through road maintenance, air quality testing and reporting to the Environmental Agency.
- Management and monitoring of surface water through testing ground water quality and reporting it to the Environmental Agency
- Hazardous waste management through Hazardous Waste Storage in permitted, management and monitoring of Hazardous waste also reported to the Environmental Agency.
- Greenhouse Gas (GHG) Management. Implement a zero-burning policy, regular engine maintenance, and regular emission quality tests.
- Internal audits.

**Worker Welfare**

- Unit certification has set minimum wage regulations for all workers based on the stipulation of minimum wages by the Governor of Lampung 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**

The company has shown the auditor regarding the RSPO metric template Version 2.1 that has been filled in according to the facts and data in the company's record documents, such as the number of workers, the area of production to the record of work accidents. Base on document verification, for The RSPO metric template known annual data 12 month period use on year 2022 for schedule reporting annual data social and environmental, included monitoring data of water consumption, management dan monitoring HCV.

<b>Status: Comply</b>
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**3.3**

**Operating procedures are appropriately documented, consistently implemented and monitored.**

**3.3.1**

Unit of certification already has an SOP, for example as follows:

- Sustainability Standard Operation Procedures (SSOP) regarding technical guidelines for planting oil palm plantations on mineral land, contained in SSOP 7. Seeding, Planting and Maintenance of Oil Palm Plants, Revision 3 dated November 15 2021.
- Procedures for Land Clearing and Replanting listed in SSOP document No. 09 Revision 4 which was approved by the company leadership on November 1, 2018.

- SSOP 15. Erosion Control and Optimal Soil Fertility Management for Productivity. which explains that in conducting land clearing activities the company must be guided by the principles of soil and water conservation. Activities undertaken for this include planting LCC, making terrace, and so on.
- Integrated Pest Management and Control (IPM) is contained in SSOP.17 Revision 04 dated May 2, 2020, which explains the types of pests, integrated chemical and biological pest control.
- SSOP No.18 concerning the Safe Use and Storage of Chemicals including Hydrocarbons Revision No. 2 dated March 25, 2020.
- SSOP No.10 Standards for Maturity of Fresh Fruit Bunches (FFB) and Harvest Revision 1 dated August 10 2017. Describes standards for maturity of FFB, harvest rotation, harvest conditions, inter-harvest infections and harvest rotation monitoring systems.

### 3.3.2

The company already has a mechanism to check the consistent implementation of procedures including:

- SSOP 14 Sustainability Audit To ensure consistency in the implementation of procedures, the company routinely conducts plantation/mill internal audits. Audit activities are conducted by the sustainability coordinator every semester. In addition, three months before the external audit visit, an internal audit must be carried out at least once.
- SSOP 30 Monitoring for Improvement Best Practices. explains about Plantation operational monitoring, Yield Improvement Program, Monitoring maintenance efficiency, Evaluation of monitoring results, and Corrective Actions.

Thus, it can be concluded that the company already has a mechanism to ensure that procedures have been carried out consistently.

### 3.3.3

The company has documented plantation operations and factory products such as daily reports, supervisor workbooks, etc. This unit has documented daily activities in daily production reports which are documented using a computerized system.

While the consistent implementation of procedures, the company conducts periodic internal management and evaluation involving all levels of key management. Unit of certification shows the RSPO/ISPO internal audit results of PT Prima Alumga which were carried out from 23 to 28 January 2023, with 19 non-conformance results, 17 opportunities for improvement in the RSPO internal audit. The non-conformity has been followed up.

**Status: Comply**

### 3.4

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

#### 3.4.1

Unit of certification no new plantings or operations since 2015, unit has several documents related to social and environmental impact assessments which are carried out independently and in a participatory manner, involving affected stakeholders. The document covers the pre-construction activities, the operation stage, and the post-operation stage. Some of the documents held by the certification unit include:

#### Environmental Impact Assessment (EIA)

The environmental documents and environmental permits consist of several documents.

- The Environmental Feasibility Document (AMDAL) was ratified by the AMDAL Commission with Decree Number. 107.1/KOMDAL/II.04/2013 dated 17 April 2013 and based on the Decree of the Mesuji Regent on 12 April 2010 with Number. 800/466/III.06/MSJ/2010 regarding the issuance of Environmental Documents with the scope of a **plantation area of 10,252.43 Ha and a processing plant with a capacity of 45 tons of FFB/hour** located in Sungai Cambai and Sungai Sidang, Mesuji Timur and Rawa Jitu Utara Districts, Mesuji Regency, Lampung.
- Addendum to environmental documents due to the **addition of an area of 260.52 Ha** based on Decree of the Mesuji Regent Number. B/176/I.02/HK/MSJ/2016 dated 9 May 2016 regarding the environmental feasibility of PT Prima Alumga's planned oil palm plantation and palm oil processing factory in Sungai Cambai Village, Sungai Sidang Village and Sidang Gunung Tiga Village, District East Mesuji and North Rawajitu District, Mesuji District.
- Environmental Permit documents for addendum documents based on the Decree of the Mesuji Regent Number.



B/177/I.02/HK/MSJ/2016 dated 9 May 2016 concerning environmental permits for planned activities of oil palm plantations and palm oil processing factories of PT Prima Alumga in Sungai Cambai Village, Sungai Sidang Village and Sidang Gunung Tiga Village, Mesuji District East and North Rawajitu District, Mesuji District.

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

The SIA (Social Impact Assessment) conducted for scope of PT Prima Alumga in 2014 by Sonokeling Akreditasi Nusantara. SIA document contains evidence of villager's participation that affected, as well as internal stakeholders. Participation was conducted by interviews and focus group involving the village and community leaders Cambai Village, Wiratama Village, Mekartitama Village, Sumber Jaya Village, Sidomukti Village, Sungai Sidang Village, Sungai Buaya Village, Gunung Tiga Village, Sungai Bandar Anom Village, Sido Mekar Village. Results of the consultation meeting had been summarized in the SIA report. As part of social impact management, company has conduct Corporate Social Responsibility (CSR) program considering the results of the Environment Impact Assesement and Social Impact Assessment study.

Based on document review, there are several impacts which has been identified including negative and positive impacts. The target matrix consists of the environmental sector (roads, bridges and lighting, clean water facilities, health facilities), the socio-economic sector (job opportunities), the socio-cultural sector (changes in public perception, disruption of public order), corporate social management, industrial relations, development of company HR competencies, employee career paths, salaries and other benefits, as well as employee internal communication patterns.

### **3.4.2**

#### **Environmental Impact Assessment (EIA)**

PT Prima Alumga has documents related to the implementation of management and monitoring in accordance with the Environmental Permit Document based on the Decree of the Mesuji Regent Number. B/177/I.02/HK/MSJ/2016 dated 9 May 2016, which can be shown through the management and monitoring implementation report document for the 2022 period according to the matrix carried out by the company.

Environmental Impact that is managed and monitored:

- Air quality, increased emission of NO<sub>2</sub>, CO, SO<sub>2</sub>
- Increased dust concentration
- Increased noise
- Surface water discharge
- Surface water quality
- Aquatic biota
- Community income
- Employment Opportunity
- Local economy
- Community perceptions and positive attitudes
- Community/worker health and the environment

PT Prima Alumga has also carried out routine reporting to the relevant agencies, the results of interviews with the Mesuji Regency Environmental Service also stated that the company routinely reports the results of the implementation of environmental management and monitoring. The following is an example of proof of receipt of report delivery.

- Proof of delivery of the RKL-RPL Semester 2 of 2022 report (No. 142/EXT/PPA/VI/2023) to the Head of DLH Mesuji Regency, Lampung Province on June 5, 2023, and available proof of electronic reporting via SIMPEL KLHK with ID TTE: 4365.
- Proof of delivery of the RKL-RPL Semester 1 2022 report which was reported to DLH Mesuji Regency, on June 8 2022 and electronic reporting via SIMPEL KLHK with ID TTE: 1658482783-4365.

The company also has the results of Identification of protected areas and areas of high conservation value carried out in December 2014 in collaboration with PT Sonokeling Accreditation Nusantara with an area of assessment of PT Prima Alumga's HGU area of 10,512.95 Ha, with an area for certification scope of 8,503.19 Ha. Based on document reviews, interviews with management, and field observations, the current managed conservation area is 75.56 ha.



**Social Impact Assessment (SIA)**

PT Prima Alumga has conducted a social impact assessment updated on 06 December, which is contained in the Monitoring Report of the Social Impact Assessment. The study areas in the Anugerah Estate, Bintang Estate, and Ceria Estate. Social impact assessment is carried out to internal parties (Employees) and external parties (community of surrounding villages).

In the report, the aspects studied (internal and external) include.

- Internal: Recruitment, work agreements, induction, LRC, working hours and records, overtime, weekly rest days, piece rates, wage scales, premiums, wage deductions, PPE, work tools, BPJS, menstrual breaks, maternity leave, complaints, trade unions, etc.
- External: Land compensation, land conflicts, community consultation, contractors, theft cases, CSR, partnerships, grievances, health, environmental pollution, legal limits, etc.

**3.4.3**
**Environmental Impact Assessment (EIA)**

PT Prima Alumga has documents, the implementation of the results of the environmental permit including reports to agencies in the form of RKL-RPL documents which are conducted every semester and reported to related agency (explain in indicator 3.4.2). The effectiveness of environmental management and monitoring can be seen from the results of environmental management and monitoring analysis, which can also be seen from the suitability between the management and monitoring plans and their implementation in the field. The RKL-RPL document also shows that the company has managed all the critical impacts recommended in Environmental permits. Include impact analysis by trend evaluation, critical level evaluation and compliance evaluation.

From field observation found that environmental management in accordance with the RKL-RPL by installing signboard for conservation areas, marking spray-boundary areas and other chemical applications. Based on the results of interviews with sprayer workers, they also stated that they were aware of the prohibition on applying chemicals to the buffer zone marked in red. In addition, they do not apply chemicals when they are close to water bodies such as canals, reservoirs or artificial ponds.

**Social Impact Assessment (SIA)**

PT Prima Alumga has carried out management which has been regularly reviewed and updated, namely through the 2022 SIA Review Minutes document on December 6, 2022, and evidence of its participation which was attended by the Head of Sumber Jaya Village, Makartitama Village, Anugerah Estate Manager, Bintang Estate Manager, Manager Estate Ceria, Senior Assistant, Sustainability Team, and Public Relations. Information was carried out through a questionnaire attached to the minutes.

Based on the results of the document review, companies are encouraged to

- Conduct a more in-depth mapping of key stakeholders, for example for external stakeholders by paying attention to women, migrants, local residents, youth leaders, contractors, including conflict victims and for internal stakeholders by paying attention to the representation of wider workers such as local workers, migrants, women, workers including contract workers.
- Develop a questionnaire or information gathering model that informs the potential impact of the company's operational activities as a whole in accordance with the initial identification according to the level of importance and potential impacts that may arise. (OFI)

<b>Status: Comply</b>
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**3.5**
**A system for managing human resources is in place.**
**3.5.1**

The company has employment procedure including recruitment, selection, promotion, retirement, dan termination of employment in document of:

**Selection and Recruitment of Workers**

Employee Recruitment Procedures Explained in the Documents of the Collective Labor Agreement (CLA) for the 2022–2024 period in Chapter III Employment Relations Article 9: Acceptance, Appointment, Transfer, Promotion, and Demotion. Non-discriminatory policy is explicitly explained in the KKK (Kuala Lumpur Kepong) Sustainability Policy signed by the Chief Executive Officer (30 August 2018).

In addition, the new employee recruitment system is described in the SOP for Employee Management with SSOP Number 29 Revision 5 effective January 13, 2021, which was approved by the R & D Director. In the SOP, which explains the recruitment and interview methods, requirements for employee recruitment such as 18 years of age, ID card and family card, health checks, no ethnicity, religion, race and intergroup, registration (*BPJS Ketenagakerjaan* and *Kesehatan*). Instructions regarding working hours, leave, how to work and more. Recruitment information is done openly, recruitment is free of charge, and there is no retention of workers' personal documents.

#### **Promotion, Career Path System and Job Performance Assessment**

Promotions are regulated in the Collective Labor Agreement, stated that employees who have passed the probationary period will Appointed as a permanent employee, the company carries out a transfer taking into account the skills, abilities and career path.

The system for career paths and work performance evaluation is regulated in the Worker Management SOP document, SSOP Number 29 Revision 5, effective January 13, 2021, which was ratified by the R & D Director. The document describes the procedures for the stages of performance appraisal and employee career paths (promotion, demotion, and transfer).

#### **Pension**

In the Collective Labor Agreement, it has regulated pensions, briefly including:

- After serving 30 years or more, and/or reaching the age of 55, an employee is entitled to a full pension.
- Except at the request of the company, an employee will be retired at the age of 55 and can be extended to work at the company after his rights are fulfilled by the company.

#### **Work Termination**

Termination of employment has been contained in the Collective Labor Agreement, briefly as follows:

- The company tries to avoid termination of employment as much as possible.
- Termination of employment will be carried out if:
  - Employees have been given Warning Letter III or last but still commit violations again.
  - Employees are sick consecutively for more than 12 months.
  - The employee violated article 43 of the collective labour agreement by considering the seriousness of his mistake.
- For employees who will resign, they must submit an application at least 1 month in advance and are entitled to get long service award money.
- Every employee whose employment relationship is terminated due to a mistake or if the company changes status, merges, consolidates or changes in ownership, everything refers to Law Number 13 of 2003.

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

#### **3.5.2**

The company has documented all labor procedures that have been carried out properly, such as recruitment, promotion, performance appraisal, and termination. For example, the company has shown labor procedures that have been implemented and are well documented as shown below:

- Workers with the initials A.P.A. (Store Helper) who have sent an application letter on May 6, 2022, and have been accepted as workers through the acceptance stages determined by the procedure, for example: ability tests, medical tests, etc. The worker has received an SPK with Number 197/HRPPA-SDM/XI/2022, which was signed on November 11, 2022.
- L.R.S. work performance appraisal document (initials) for the 2022 assessment period, which provides information regarding the assessment criteria, assessment results, and follow-up of the assessment results.
- A promotional document in the form of Promotional Decree N.S. (initials) Number AD-Pers/SKPTS/184/2022 issued on October 26, 2022. The worker is promoted from Permanent Employee status to Sustainability Staff status.
- Termination document such as the management decree of employment's termination on behalf of MAN (initial). The company also showed other supporting documents such as the management decree of employment's termination, debt certificate, calculation of termination payments, and proof of its payment in accordance with the applicable laws.

Based on interviews with workers (harvesting, spraying and mill operators) in note 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 promotion / class promotion had received an assessment from their superiors and workers who retired received all their rights as retirees. During past year there were no labor issues that occurred at certification unit, this was strengthened by the results of consultations with the workers union, the Manpower and Transmigration Agency of Mesuji District which stated that the application of existing labor procedures certification unit is in accordance with the regulations and since 2022 until now there have been no labor issues.

**Status: Comply**

### 3.6

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

##### 3.6.1

The company has an Occupational Health and Safety policy which was ratified on January 1, 2021. The contents of the policy include the company's commitment to comply with all laws and regulations on OHS, conduct risk studies, and conduct evaluations as a basis for continuous improvement. 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 activity in estate, for example the Environmental Impact Analysis and OHS Risk Assessment which were prepared by OHS Experts and approved by EM on 27 March 2023 with work activities/processes consisting of all activities such as 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 and etc.

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

The unit of certification has an identification and training program for 2022-2023 in order to improve the competence and expertise of all employees including contractors, furthermore in the unit of certifications there's no smallholder/outgrower so its no applicable to provide training schedule for them. The unit of certification has identified the need for competency standards and training proposals for each worker, for example:

- Firefighting simulation training for emergency response team.
- First Aid Training.
- Pesticide application training for pesticide application employees.
- Training on PPE usage for harvesting, pesticide application, and warehouse workers.

Unit of certification also shows that they have properly documented every training and outreach activity. The following is an example of documentation of the training/socialization that has been carried out, for example:

- HCV socialization training, 3x container washing and spraying training on 14 July 2022 which was attended by 8 workers from Anugerah Estate.
- Training on the use of PPE for harvesting on 22 July 2022 attended by 16 workers at Bintang Estate.
- Firefighting simulation training for the emergency response team on July 15, 2022, which was attended by 21 workers at Ceri Estate.
- First Aid Training On 2-3 June 2022 attended by 36 participants which was conducted at Grace.

Based on field observations and interviews with workers (harvesters, maintenance workers, warehouse workers, and factory operators), it is known that the company provides several training programs to improve workers' skills and competence. All workers also demonstrate a fairly good understanding of the duties and responsibilities of each job.

### 3.7.2

The unit of certification has properly documented every training and outreach activity. The following is an example of training/socialization documentation that has been carried out, for example:

- HCV socialization training, 3x container washing and spraying training on July 14, 2022, which was attended by 8 workers from Anugerah Estate.
- Training on the use of PPE for harvesting on July 22, 2022, attended by 16 workers at Bintang Estate.
- Firefighting simulation training for the emergency response team on July 15, 2022, which was attended by 21 workers at Ceri Estate.
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Based on field observations and interviews with workers (harvesters, maintenance workers, warehouse workers, and factory operators), it is known that the company provides several training programs to improve workers' skills and competence. All workers also demonstrate a fairly good understanding of the duties and responsibilities of each job.

### 3.7.3

Since the company does not has a Mill, the supply chain indicators are not applicable.

**Status: Comply**

## 3.8

### Supply Chain Requirements for Mills

#### 3.8.1 – 3.8.17

Since the company does not has a Mill, the supply chain indicators are not applicable.

**Status: Comply**

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

### 4.1

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

#### 4.1.1

The company already has human rights policies contained in the KLK Sustainability Policy, which was approved by management on August 30, 2018, including among others:

- Recognizing the inherent dignity of every person and supporting the Universal Declaration of Human Rights by the United Nations including the prohibition of retaliating against human rights defenders in accordance with the United Nations Declaration on Human Rights
- Respect and uphold the rights of all workers, including contract, temporary and migrant workers with the core conventions of the International Labor Organization, the UN guiding principles on business and human rights and the principles of free and fair employment in palm oil production as a guide.

- Ensure compliance with ratified local, national and international laws and that international best practice is applied where a legal framework is not already in place.

The company has conducted socialization related to company policies. For example, the company shows documentation of socialization related to RSPO, company Policy including Human Rights and others January 12, 2023, attended by 43 to workers.

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

#### 4.1.2

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

**Status: Comply**

#### 4.2

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

##### 4.2.1

Unit certification can demonstrate the existence of conflict, complaint, and grievance handling procedures such as procedure for providing information to public (*SOP Permintaan dan Pemberian Informasi, Komunikasi dan Penyampaian Keluhan*) No. SSOP 1 Revision 4 on 25 October 2021. This SOP describes the types of complaints submitted, for example: terms and conditions of work, OHS, violence and discrimination, harassment, and abuse of authority. This procedure is used for handling reports and complaints from internal and external stakeholders. In the procedure, it is stated that the complaint resolution period is 14 days from the time the complaint is received. Information regarding the receipt of the complaint must be communicated to the complainant. In addition, the procedure also regulates confidentiality and legal protection for the complainant (whistleblower until the complaint is resolved. If the reporting party/complaint is not satisfied and an agreement cannot be reached, the settlement of the reporting/complaint case can be continued to the mediator and the settlement through a third party (tripartite).

Based on interviews with workers, smallholders, contractors and representative communities, it revealed that they had good understanding of grievance mechanism and personnel who served as communicators between unit certification and community so that illiterate people can be informed by related communicators. In addition, during past year, there were no complaints or disputes that occurred between company and surrounding communities.

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.

##### 4.2.2; 4.2.3

Unit certification shown *SOP Permintaan dan Pemberian Informasi, Komunikasi dan Penyampaian Keluhan* No. SSOP 1 Revision 4 on 25 October 2021. The procedure states that parties who cannot read and write can be accompanied by a trusted representative or carried out by displaying the procedure in writing or by showing pictures to explain related procedures that are owned.

This procedure also explained that the company can be brought the complaints to the RSPO complaint system if there wasn't any solution yet and protected the identity of the whistle-blower if needed. In addition, it was also explained that the response time period is 14 days. The officer responsible for responding to stakeholders is the Manager/Assistant/Administration Head/Public Relations.

Based on interviews with representatives of Sungai Cambai Village and the Mesuji Regency Environmental Service, it is known that stakeholders know about the mechanism for conveying information.



**4.2.4**

Company showed procedure in handling any grievances (No. SSOP 01 Rev-04) validated on 25 October 2021 concerning in handling grievance and consultation for all stakeholders. The policy explained activities of handling grievances related to workers' and all stakeholder's grievances through each worker's supervisor, grievance logbook, suggestion box, gender committee, labour union, company's hotline number and etc. In the procedure of complaint mechanism has been set that the complaint resolution is address in deliberation in advance. If no deal achieved, every party might deliver the case to the lawsuits or RSPO complaint panel. In addition, it was also explained that the response time period is 14 days. The officer responsible for responding to stakeholders is the Manager/Assistant/Administration Head/Public Relations.

The results of interviews with workers and labour union known that workers understand the grievance mechanism. Complaints can also be submitted to labour union. The results of interviews with contractors and head of village around indicated that the village and contractors had understood the grievance mechanism.

<b>Status: Comply</b>	
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**4.3**

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

**4.3.1**

Contributions to community development based on the results of consultations with local communities, (Mekartitama Village, Wiratama Village, Sungai Cambai Village, Sungai Sidang Village) can be demonstrated by meetings between community representatives and the company in 2022 as the basis for CSR plans for 2023.

Program Classification :

- Education: teacher honours and scholarships in the village around the company.
- Employees: independence celebration etc.
- Community: road repairs, assistance with building materials, donations, repairs to places of worship and maintenance of football fields and certification of firefighters training.
- Socio-Cultural and Religious.
- Environment.
- Government Relations (charity) are entered according to the proposed program classification.

Based on interview with head of Mekartitama and Wiratama Village, known that the planning and community development plans also involved the community through FGD activities or *Musrembang*. In addition, that the company's current relationship is going well and the contributions made are also according to community needs.

<b>Status: Comply</b>	
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**4.4**

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

**4.4.1**

PT Prima Alumga are long established company were starting operational since period of 1990. Former name of PT Prima Alumga are PT SAC Nusantara (PT SACNA) and taking over dan renamed PT Prima Alumga. In 2021 Kuala Lumpur Kepong Berhard acquisition this company and became of one of the subsidiaries. Based on documents verifications it was known the total area of certifications are in line with legal documents that owned covering **8,504.29 Ha** as divided in the several legal documents as follows:

- Decree of the Head of BPN No. 25/HGU/KEM-ATR/BPN/IV/2022 on 13 April 2022. Concerning the extension of land title of PT Prima Alumga with the total area total 6,360.7449 Ha.
- Decree of the Head of BPN No. 130/HGU/BPN RI /2013 on 19 November 2013 concerning of the granting of land title of PT Prima Alumga with the total area are 260.52 Ha.
- Decree of the Head of BPN No. 16/HGU/BPN /95 on 15 March 1995 concerning of the granting of land title of PT Sac Nusantara with the total area are 3,881.92 Ha.

Based on those decree issued land title certificate as follows:

- HGU Certificate No 13 formerly no 35 with total area 6,360.7449 Ha valid until 31 December 2029.
- HGU Certificate No 24 with total area 1,883.03 Ha valid until 31 December 2029.

- HGU Certificate No 68 with total area 260.52 Ha valid until 17 February 2049.

### 4.4.2; 4.4.4; 4.4.5; 4.4.6

There were no land expansion and new developments carried out by the unit of certifications since take over from previous owner. Based on field observation, interview with managements and community leaders company obtained information if the unit of certifications are long established company which starting operational prior the period of 1990. Based on interview with community (representative from Mekartitama Village, Wiratama Village, Sungai Cambai Village and Sungai Sidang Village) obtained information's land compensation has been done prior the plantation developed, furthermore, based on interview with managements the land compensations documents were no longer available due to the company has been changes the ownership several times. meanwhile, based on interview with community (representative from Mekartitama Village, Wiratama Village, Sungai Cambai Village and Sungai Sidang Village) it was known there is no issue regarding land ownership or conflict between community.

Although PT Prima Alumga 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 had the Area Statement map that described various land use in permit Areas, including area width. Based on documents verifications it was known the total of not compensate area is 174.73 Ha. That's areas managed by the community are palm oil, rubber, or horticulture. In other information, there is no significant land conflict in PT. Prima Alumga related to the existence of arable areas in the company's permit area.

Although there was no new land compensation in PT Prima Alumga, the company has been developed an FPIC process that explained the Land Acquisition and Compensation, document SOP No 5 about Land Acquisition, revision 2 related to identifying legal, customary or user rights, and for identifying people entitled to compensation.

### 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 from Village obtained information's, it is recognized that they know the legal boundaries owned by the companies.

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. The planting year after 2010 is classified as second cycle.

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

prosedur for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation are available in place (SSOP No 5 on 03 June 2023 about *Perolehan Lahan untuk Penanaman Kelapa Sawit*) The Procedure explained the stages of land acquisition which include the principle of land acquisition; research, verification, and inventory data stages; the stage of submitting funds for payment of compensation/land acquisition; payment document verification stage; and document storage.

There were no land expansion and new developments carried out by the unit of certifications since take over from previous owner. Based on field observation, interview with managements and community representative from Mekartitama Village, Wiratama Village, Sungai Cambai Village and Sungai Sidang Village company (obtained information if the unit of certifications are long established company which starting operational prior the period of 1990 and there are no new land compensations. Based on interview with community as explained above obtained information's land compensation has been done prior the plantation developed, however



based on interview with managements the land compensations documents were no longer available due to the company office burned down during the conflict. Furthermore, based on interview with community it was known there is no issue regarding land ownership or conflict between community.

**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 and 4.7.3

PT Prima Alumga are long established company were starting operational since period of 1990. Former name of PT Prima Alumga are PT SAC Nusantara (PT SACNA) and taking over and renamed PT Prima Alumga. In 2021 Kuala Lumpur Kepong Berhard acquisition this company and became of one of the subsidiaries. Based on documents verifications it was known the total area of certifications are in line with legal documents that owned covering 8,504.29 Ha as divided in the several legal documents.

There were no land expansion and new developments carried out by the unit of certifications since since take over from previous owner. Based on field observation, interview with managements and community leaders company obtained information if the unit of certifications are long established company which starting operational prior the period of 1990. Based on interview with community as explained above obtained information's land compensation has been done prior the plantation developed, however based on interview with managements the land compensations documents were no longer available due to the company office burned down during the conflict. Furthermore, based on interview with community it was known there is no issue regarding land ownership or conflict between community.

Although PT Prima Alumga 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 had the Area Statement map that described various land use in permit Areas, including area width. Based on documents verifications it was known the total of not compensate area is 174.73 Ha. That's areas managed by the community are palm oil, rubber, or horticulture. In other information, there is no significant land conflict in PT. Prima Alumga related to the existence of arable areas in the company's permit area.

Furthermore, there was no new land compensation in PT Prima Alumga, the company has been developed an FPIC process that explained the Land Acquisition and Compensation, document SOP No 5 about Land Acquisition, revision 1 dated 10 August 2017 related to identifying legal, customary or user rights, and for identifying people entitled to compensation.

Based on interview with communities of village representatives from Village there was no such written agreement that allows previous landowners to have opportunities of benefit from plantation development. However, the company has several policies, as well as SIA management and monitoring plan that has some purposes to improve livelihoods quality of surrounding communities, includes the development of scheme smallholders, acceptance of local workers and contractors if needed, economic development program, and any other CSR programs.

**Status: Comply**

### 4.8

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

#### 4.8.1; 4.8.2; 4.8.3; 4.8.4

PT Prima Alumga are long established company were starting operational since period of 1990. Former name of PT Prima Alumga are PT SAC Nusantara (PT SACNA) and taking over and renamed PT Prima Alumga. In 2021 Kuala Lumpur Kepong Berhard acquisition this company and became of one of the subsidiaries. Based on documents verifications it was known the total area of certifications are in line with legal documents that owned covering 8,504.29 Ha as divided in the several legal documents.

Although PT Prima Alumga 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 had the Area Statement map that described various land use in permit Areas, including area width. Based on documents verifications it was known the total of not compensate area is 174.73 Ha.

That's areas managed by the community are palm oil, rubber, or horticulture. In other information, there is no t land conflict in PT. Prima Alumga related to the existence of arable areas in the company's permit area.

**Status: Comply**

## **PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION**

### **5.1**

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

#### **5.1.1**

Unit of Certification does not accept outside FFB other than *Kebun Kemitraan* (Koperasi Produsen Mesuji Sejahtera).

Company has shown a document of FFB pricing determined by the company based on Agriculture and Plantation Service of Lampung Province, for example on March 2023 for FFB prices in the 5-year planting year is calculated at 2,065.92 rupiahs per kilogram. The unit of certification also shows an example of payment for the March 2023 which is paid directly to the supplier's account according and this is according to the price that has been set.

#### **5.1.2; 5.1.6**

FFB pricing for suppliers follows the price set by the Lampung Province government. Based on interviews with the Koperasi Produsen Mesuji Sejahtera, it is known that they have received an explanation regarding the determination of the FFB price and also known the price is fair and there has never been a late payment. It can be proved also by payment receipt for FFB Koperasi Produsen Mesuji Sejahtera on March 31, 2023, for the March 2023 period with invoice number 03/MSJ/2023. The price of FFB is informed using the WhatsApp and telephone from the PIC every month.

#### **5.1.3**

Unit of certification has determined a fair price where the price is adjusted to the price of Plantation Agency, the price agreement has been included in the MoU Article 8 (f); *The company's obligation to purchase the products of cooperative plantations at prices in accordance with applicable laws and regulations between PT Prima Alumga and Koperasi Produsen Mesuji Sejahtera PPA/SPK/IV/2023/001 and 001/KUD-MS/IV/2023 dated 11 April 2023 with a valid until 31 August 2043.*

#### **5.1.4**

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

#### **5.1.5**

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

Letter of Agreement No. PPA/SPK/IV/2023/001 and 001/KUD-MS/IV/2023 between PT Prima Alumga and Koperasi Produsen Mesuji Sejahtera dated 11 April 2023 with a valid until 31 August 2043.

#### **5.1.7**

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

- Certificate of Test Results No. 510.3/39/IV.22/UML/TB/VII/2022 Brand: Avery Weight Tronix which was carried out on 07 July 2022.
- Certificate of Test Results No. 510.3/60/IV.22/UML/TB/IX/2022 Brand: Avery Weight Tronix which was carried out on 28 September 2022.

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

**5.1.8**

The company does not receive FFB from independent smallholders, there are only *kebun kemitraan* which are managed in full management by the company.

**5.1.9**

The company has procedures related to communication and handling of complaints contained in the SSOP 1. Rev 04 effective date on October 25, 2021. The document explains, the type of complaint, the mechanism for submitting complaints (through the log book, through superiors, through the union, or suggestion box or email), the flow of the complaint resolution process has a 14-day time frame, and whistleblower provisions. Based on document review of complaint book 2022- June 2023, there is no complaint were recorded.

**Status: Comply**

**5.2**

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

**5.2.1; 5.2.2; 5.2.3; 5.2.4; 5.2.5**

Until the IC audit held, the company does not receive FFB from Independent Smallholders, or other 3<sup>rd</sup> party suppliers, there are only *kebun kemitraan* which are managed in full management by the company.

**Status: Comply**

**PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS**
**6.1**

**Any form of discrimination is prohibited.**

**6.1.1**

The company already has a policy regarding equal opportunities and treatment to get employment opportunities contained in the Kuala Lumpur Kepong Berhad (KLK) Sustainability Policy point 2.1 (x) Equal Employment Opportunities in Diversity:

- Ensuring equal opportunity in the workplace. All decisions relating to hiring, pay, access to training, promotion, termination or retirement will be made based on business needs, worker requirements and individual qualifications.
- No discrimination based on ethnic origin, caste, disability, nationality, nation, religion, sex, political orientation or age.
- Reproductive rights in accordance with state law must be respected.

As the Policy states, everyone has the right, regardless of ethnicity, religion, race and class, to get employment opportunities.

Based on the results of interviews with harvesters in block N37 Division 2 Bintang Estate, the spray team in block J24 Division 2 Anugerah Estate and representatives of the Sungai Cambai Village community, it is known that so far everyone has had the same treatment to get job opportunities, for example shown by the disclosure of information when there are job vacancies that are published transparently. From the list of employees updated for the period of May 2023, it is also known that the current employee demographics are diverse, not limited to religion, ethnicity, and certain groups.

An example of an announcement of job vacancies that has been submitted openly has been shown, for example Job Vacancies for nursing positions for the 2023 period. There are no job requirements in the vacancies that show discrimination against certain groups. Thus, it can be concluded that the company has implemented a policy regarding equal opportunities and treatment to obtain employment opportunities.

**6.1.2**

The company has shown job vacancy announcements and work agreement letters between workers and company which showed that there was no payment requested during the recruitment process. In addition, in job vacancies that have been published by company, there were no requirements that discriminated against gender, race or ethnicity, disability, sexual orientation, age, or belief. For example, harvesting worker who have initial A.P.A (store helper) 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 permanent worker.

The composition of workers consisting of various ethnic groups, religions, gender, and workers' origins. The existing workers do not only come from one area but come from several areas spread throughout Indonesia such as Java, Sumatra, Kalimantan, and others. During the audit, there was no information regarding migrant or AKAD workers (*Angkatan Kerja Antar Daerah*) in company.

Based on interviews with manpower agency, gender committee, labor unions, and workers at sample unit, it is known that workers have never felt that the company has discriminated against them and no any payment of recruiting activities. It was explained that all activities from recruitment, performance appraisal, and promotion were given equal opportunity regardless of ethnicity, caste, nationality, religion, disability, gender, sexual orientation, gender identity, membership in labor unions, politics, or age.

### 6.1.3

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

The company has shown a record of the implementation of employment procedures, for example:

#### Employee Recruitment Procedure

The company has a worker recruitment procedure which is contained in several documents, namely:

- SOP for Employee Management with SSOP Number 29 Revision 5 effective January 13, 2021, which was approved by the R & D Director.
- Documents of the Collective Labor Agreement (CLA) for the 2022 – 2024 period in Chapter III Employment Relations Article 9 Acceptance, Appointment, Transfer, Promotion and Demotion.

The procedure explains that the minimum age for workers is 18 years, recruitment information is done openly, recruitment is free of charge, and there is no retention of workers' personal documents.

The company also shows sample documents for the latest employee recruitment starting from a job application letter to a work agreement, for example as follows:

- Workers with the initials A.P.A (Store Helper) who have sent an application letter on May 6, 2022, and have been accepted as workers through the acceptance stages determined by the procedure, for example: ability tests, medical tests, etc. The worker has received an SPK with Number 197/HRPPA-SDM/XI/2022 which was signed on November 11, 2022.

#### Payroll System

The payroll system is regulated in the Collective Labor Agreement (CLA) document for the 2022 – 2024 period in Chapter VI Remuneration Article 20 Wage System and Components. The document explains the procedure for paying workers which includes payment of overtime/overtime premiums, and the structure of the pay scale.

#### Career Path System and Job Performance Assessment

The system for career paths and work performance evaluation is regulated in the Worker Management SOP document with SSOP Number 29 Revision 5 effective January 13, 2021, which was ratified by the R & D Director.

The document describes the procedures for the stages of performance appraisal and employee career paths (promotion, demotion, and transfer). The company shows examples of employee performance appraisal and promotion, for example:

- L.R.S work performance appraisal document (initials) for the 2022 assessment period which provides information regarding the assessment criteria, assessment results and follow-up of the assessment results.
- Promotional document in the form of Promotional Decree N.S (initials) Number AD-Pers/SKPTS/184/2022 issued on October 26, 2022. The worker is promoted from Permanent Employee status to Sustainability Staff status.

#### Training System

The company has identified training needs for each employee according to their position and type of work. As an example of identification that has been carried out by the company is the Material Data Safety Sheet training for Chemical Warehouse Officers and Foremen (fertilizer and spray) workers. After identifying, the company develops a training program for its employees for a year, the following is an example of the realization of a training program in 2022, namely:

- The Hazardous Waste Warehouse Training which was held on 15 August 2022 and was attended by 1 worker.
- Harvesting and OSH Socialization Training which was held on 20 July 2022 and was attended by 24 workers.
- Training and Socialization of Technical Guidance on the Use and Application of Spraying which was held on March 12, 2022, and was attended by 71 workers.

Based on the results of interviews with the Mesuji Regency Manpower and Transmigration Office, it is known that over the past year there have been no issues regarding the employment aspect in the company.

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

### 6.1.4

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

### 6.1.5

The company already has a gender committee to deal with women's or gender issues which is members consisting of male and female workers. The gender committee structure consists of head of gender committee and representatives of division. The work program of the gender committee consists of Conducting outreach/socialization related to the gender committee, Socialization related to right and obligation of female and male worker, *Posyandu*, and others.

The results of interviews with female workers known that the workers already know the gender committee and the functions of the organization. Workers are also aware of gender committee if there are complaints or complaints related to women's problems or issues. The results of interviews with representatives of committee gender and women workers, it was found that there were no complaints related to sexual harassment, violation in the last one year.

### 6.1.6

Determination of wages that apply at PT Prima Alumga based on the Decree of the Governor of Lampung Number G/751/V.08/HK/2022 concerning the Minimum Wage for Mesuji Regency in 2023. The document explains that the basic wages for Mesuji Regency in 2023 is Rp. 2,873,227.49. Furthermore, the unit certification have been developed wage structure.

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 jobs and responsibilities.

The results of interviews and the verification of workers' wages e.g sprayer operator with initial AM and EP (worker with same work and same grade), it is known that the company has given the same wages for the same scope of work and in the same grade.

**Status: Comply**

## 6.2

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

### 6.2.1

The company had procedures related to regulation reference, company policy, work relationship, leave and permission, salary payment, welfare and insurance, business trip allowance, disciplinary, mutation, work termination, grievance and complaint and others which are generally described in Collective Labor Agreement (CLA) was written in Bahasa. This Collective Labour 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 Labour Agreement have been approved by the relevant agencies.



Based on the interviews with workers (harvesters and pesticide application workers) and labour union representatives, it concluded that workers have a sufficient understanding of their rights (wages, overtime, incentives, etc.) listed in the Collective Labor Agreement and in accordance with routine socialization provided by the company.

The following are regulations stipulated by the government along with separate stipulations from companies regarding the 2023 minimum wage, namely:

- Decree of the Governor of Lampung Number G/751/V.08/HK/2022 concerning the Minimum Wage for Mesuji Regency in 2023. The document explains that the UMK for Mesuji Regency in 2023 is Rp. 2,873,227.49.
- Internal Memo Number 001/HRPPA-IM/I/2023 concerning Determination of the 2023 Mesuji UMK issued on January 25, 2023. The document explains that PT Prima Alumga's wages in 2023 amount to Rp. 2,873,228 which is valid from January 1, 2023.

Based on the results of a review of workers' wage documents for May 2023 for Harvest, Fertilizer and Spray work, it is known that the payment of workers' wages for that month is in accordance with the determination of company wages in 2023. The following is an example of wage documents for May 2023 as follows:

- Harvesters with the initials N.I receive a wage of Rp. 4,086,878.
- Fertilizers with the initials ASR receive a wage of Rp. 3,355,222.
- The sprayer with the initials S.K receives a wage of Rp. 3,131,110.

Based on the results of a document review and interviews with the Manpower and Transmigration Office of Mesuji Regency and the workers' union, the wages of plantation workers are in accordance with the minimum wage set by the government. Based on interviews with the union, it is known that wages have always been paid on time and in accordance with the stipulated conditions.

Based on verification payroll document for workers of unit sample have been above the minimum wage set by local government. Besides that, the company has been implemented structure and scale wage based on years of service, ability, attendance and job performance. There are no late payments every month.

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**

Companies can show examples of work agreement documents for workers with permanent status, including the following work agreement permanent status with the initials J.I. signed on October 1, 2022. The agreement states that the second party (in this case, the employee) is given a probationary period of three (3) months from the start of the work agreement.

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

The company also shows documents supporting evidence that the company has provided one copy of the work agreement document to the worker. This is indicated in the receipt document for submission of a copy of the work agreement. Based on the results of interviews with workers, the company provided a copy of the work agreement document at the start of hiring. In addition, workers also understand the contents of the work agreement.

The results of interviews with workers (harvesters, sprayers and upkeep) and worker 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.

Based on the description above, the company has provided copies of employment relations documents to workers in accordance with applicable labor regulations.



**6.2.3**

The company also shows sample documents for the latest employee recruitment, starting from a job application letter to a work agreement, for example, as follows:

- Workers with the initials A.P.A. (Store Helper) who have sent an application letter on May 6, 2022, and have been accepted as workers through the acceptance stages determined by the procedure, for example: ability tests, medical tests, etc. The worker has received an SPK with Number 197/HRPPA-SDM/XI/2022, which was signed on November 11, 2022.

As proof that the company has properly implemented the established wage system and refers to the applicable laws and regulations, evidence of workers' wages in May 2023 is shown as follows:

- Wages for workers with the initials RFL ( security) who receive a wage of Rp. 4,047,023, which has wage components in the form of basic wages, allowances (rice, position, etc.), deductions (BPJS, loans, etc.), overtime, premiums, and others. Overtime pay earned by workers is Rp. 1,062,848, with details of the hourly overtime pay of Rp. 16,608.25; the overtime hours obtained are 23 hours.
- Wages for workers with the initials A.U. (genset operator) who get a salary of Rp. 4,832,914, which has wage components in the form of basic wages, allowances (rice, position, etc.), deductions (BPJS, loans, etc.), overtime, premiums, and others. Overtime pay earned by workers is Rp. 1,735,976; with details of the hourly overtime pay of Rp. 16,608.25, the overtime hours obtained are 28 hours.

Based on the results of interviews with plantation and factory workers, remuneration has complied with the provisions that apply to the company and has referred to laws and regulations such as the payment of minimum wages, pay scale structure, and provision of premiums, overtime pay, and the payment of monthly remuneration on time. The company shows documents granting leave to workers as follows:

- An employee's annual leave application form with the initials ASR who applies for 1 day of leave of the total remaining 8 days of leave entitlement The application was submitted on April 1, 2023, and was approved by the Estate Manager on April 1, 2023.
- Menstrual leave application form for workers with the initials STN who apply for 1 day of menstrual leave The application was submitted on March 24, 2023, and was approved by the Clinic Manager on March 23, 2023.
- Forms for maternity leave for workers with the initials P.M. who apply for maternity leave for a total of 45 days before giving birth and 45 days after giving birth The application was submitted on March 3, 2023, and was approved by the Estate Manager on March 3, 2023.

Interview with labor union and workers, said that wages paid are in accordance with applicable regulations. Based on that interview also known that deduction for workers such as BPJS deduction, tax and etc has been described in the company regulation and circular letter. Based on interview with contractor and verification of wages of contractor workers (sample) known that contractor workers have given minimum wages by contractor.

**6.2.4**

The company has a list of employee welfare infrastructure facilities updated for June 2023, where there are worker housing facilities, religious facilities (houses of worship), sports facilities, health facilities in the form of a first aid post, clean water facilities, electricity facilities in the form of generators, a TPA (Child Day Care Center), and others. Currently, all welfare facilities provided in general are in proper condition and can be used by workers and their families.

Based on the results of field observations in the Central housing area on Anugerah Estate, the welfare facilities provided are in proper or good condition; the workers' houses consist of 2 bedrooms, 1 bathroom, and a kitchen; clean water is provided every day; electricity is provided by the company; religious facilities are in the form of mosques; and other facilities The first aid post is available as a worker health facility that can be accessed by workers and their families. This is supported by the results of interviews with housing residents who stated that the housing facilities provided were in decent condition, one house was occupied by one head of family, and so far, if there were complaints from workers regarding housing facilities, the company would respond and make repairs as soon as possible. In accordance with the description above, it can be concluded that the company already has facilities and infrastructure for the welfare of workers in proper conditions that can be accessed by workers and their families.

**6.2.5**

Based on the results of interviews with residents of employee housing as well as representatives of the gender committee and labour unions, it is known that access to food can be reached easily. The distance between the housing and the nearest market can be reached within 30 minutes. Periodically there are grocers who enter the residential area. Apart from that, there is also an employee cooperative, one of which is the provision of staple goods (groceries).

Based on this, it can be concluded that the unit of certification has made efforts to improve workers' access to proper, sufficient, and affordable food.

#### **6.2.6**

The determination of wages at PT Prima Alumga is based The Decree of the Governor of Lampung Kpts.1783/XII/2022 dated December 7, 2022, concerning the Minimum Wage of Mesuji District in 2023 which is Rp. 2,873,227.49.

In relation to Living Wage, the company has tried to do Prevailing Wage calculations for each unit, which included samples of In-Kind Benefits, such as Housing, electricity for home, water, education, etc. Living Wage calculation is based on actual and rational price at certification unit location. The components included in the calculation of a living wage include the following:

- Mesuji District minimum wage in 2023 : IDR 2,873,227
- House : IDR 652,022
- Electricity & Water : IDR 304,028
- Education : IDR 5,891
- Child care : -
- Health : IDR 87,000
- Recreational sports and religious days : -
- Total : IDR 3,922,168

Prevailing Wage calculation is based on actual and rational price at certification unit location.

#### **6.2.7**

The company has employee recruitment procedures explained in Worker Management in Sustainability SOP No. 29 Revision 5 on 13 January 2021. There was no discrimination between workers. The company has also socialized about its policy and procedure related to prohibition of worker discrimination in company to workers.

Based on the results of a review of employee list documents for May 2023, there are a total of 778 workers in the plantation unit. Out of a total of 778 workers, all of them are permanent workers. Based on the document review, it is known that all work that is permanent is carried out by permanent workers.

Based on the results of interviews with the Manpower Office, it is known that there are no contract or casual worker employed in permanent jobs. The company also shows documents for the appointment of contract employees to become permanent employees, for example:

#### **Anugerah Estate:**

- Letter of Senior Estate Manager Number: 001/PPA-ANUGERAH/PPK/II/2022 Dated February 21, 2022, concerning Changes in the status of contract employees to permanent employees totalling 104 UPKEEP/Maintenance Employees and 87 Harvest Employees.

#### **Bintang Estate**

- Letter of Senior Estate Manager Number: 001/PPA-BINTANG/PPK/II/2022 Dated February 21, 2022, concerning Changes in status of contract employees to permanent employees totalling 73 UPKEEP/Maintenance Employees and 70 Harvest Employees.

#### **Ceria Estate**

- Letter of Sr. Estate Manager Number: 021/PPA-CERIA/PPK/II/2022 dated February 24, 2022, concerning Notification of Appointment of permanent employees, to complete data for the appointment of permanent workers according to the published

list:

- Harvesting: 102 employees
- Upkeep: 81 employees

Based on document verification, there are no migrant workers in this company. In addition, based on interview with worker union board sighted that so far, there has never been a penalty for termination of employment, bonded labor practices, withholding wages, and forced overtime.

**Status: Comply**

### 6.3

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

#### 6.3.1

The company had a policy concerning the rights of workers to establish labour union. This policy is stated in the KLK Group Sustainability Policy updated on August 30, 2018, validated by CEO. This policy explained that KLK Group committed to respect and protect human rights including the rights of workers to freedom of association, collective bargaining, to form and join labour unions of their choice.

The company has also shown documentation of socialization of company policies including freedom of association policies, such as socialization on February 25, 2023, to workers.

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

- Evidence of registration of a workers' union at PT Prima Alumga Mesuji Regency with Registration Number 560/124/III.05/MSJ/VI/2014 on June 11, 2014
- Evidence of registration of changes in the management of the Plantation Agriculture Workers Union of PT Prima Alumga for the 2023–2023 Service Period with Registration Evidence Number No. Decree 66/PD.F.PP.SPSI/LPG/VII/2022 on July 27, 2022.

#### 6.3.2

The company also shows documents from internal trade union meetings and bipartite meetings, including the following examples, Bipartite meeting on July 27–28, 2022, which was attended by 11 Bipartite members from both company representatives and workers' representatives. The meeting discussed the 2022–2024 PKB negotiations.

Based on the results of interviews with representatives of worker unions, it is known that worker unions hold meetings when there are requests from members and issues that must be discussed immediately.

Based on the description above, it can be concluded that the company has documented documents forming a Workers' Union and good meetings between plantation business actors and workers' unions.

#### 6.3.3

The company has a policy regarding the formation of labor unions, which is listed in the Kuala Lumpur Kepong Berhad (KLK) Sustainability Policy Document, point 2.1: Respect and Recognize Rights at Work (vi): Freedom of Association and Right to Bargaining Collectively.

- Recognizing and respecting employees' rights to form and join trade unions of their choice and bargain collectively KLK will not deny opportunities to collectively bargain directly with groups of workers who wish to do so.
- Worker unions have access to KLK plantations, and KLK will not interfere with the organization of workers' activities, workers' representatives, or trade union representatives. Workers' representatives will not be discriminated against and will have access to carry out their representative functions at the workplace.
- The policy explains the company's commitment to giving workers the freedom to form trade unions. This policy has been socialized, for example, on February 25, 2023, which was attended by 42 workers.

Based on the results of interviews with worker unions, the company has facilitated workers formation of trade unions by providing facilities in the form of rooms for activities and not intervening in trade union activities. The results of interviews with workers revealed that union membership is voluntary.

**Status: Comply**

#### 6.4

#### **Children are not employed or exploited.**

##### 6.4.1, 6.4.2, 6.4.3 and 6.4.4

The company already has a policy prohibiting the employment of minors contained in the KLK Sustainability Policy issued on August 30, 2018, and signed by the Chief Executive Officer and in the 2022–2024 Collective Labor Agreement Document, Chapter III, Article 9, Acceptance, Appointment, Transfer, Promotion, and Demotion. According to the KLK Sustainability Policy and the PKB Documents, it is known that the minimum age for workers is 18 years. Based on the list of employees for the period May 2023, it is known that none of the employees are less than 18 years old when they first start working.

An example of the socialization of the prohibition of employing underage children has been shown to the parties, for example, in the HR Talk Activity Report on February 25, 2023. In addition, warnings were also found that informed the prohibition, including the prohibition against children being in work locations.

Based on the results of field visits to fertilizer workers and harvest workers, it was found that there were no child workers. Results of interviews with workers' representatives such as the Trade Union and the Gender Committee. There has never been any issue regarding child labor. Thus, it can be concluded that the company has implemented a policy regarding the prohibition of employing underage children.

Based on the results of the review of the agreement document with the contractor for examples is PT Deffa Citra Lampung, 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. The unit of certification demonstrates communication about its 'no child labor' policy and the negative effects of child labor and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.

**Status: Comply**

#### 6.5

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

##### 6.5.1

The company showed the policy concerning sexual harassment, violence, abuse, and reproductive rights stated in the KLK Group Sustainability Policy updated on August 30, 2018, and approved by the CEO. This policy explained that the company doesn't tolerate any forms of violence, intimidation, or harassment. In terms of that, this policy encourages workers to report all sexual harassment they experience.

In addition, the company also had a SOP concerning the procedure for handling sexual harassment, No. SOP 27, dated August 10, 2017. It stated the mechanism for reporting any forms of violence or harassment, from the common case to the severe case. The company has conducted socialization related to company policies, including policies concerning sexual harassment, violence, abuse, and reproductive rights, such as Socialization on January 12, 2023, to workers. Based on the results of interviews with the gender committee and female workers, it is known that the company has provided socialization regarding prevention of sexual harassment, sexual violence, and reproductive rights protection policies.

##### 6.5.2

The company's policy of guaranteeing the right to time off for workers is contained in the CLA document for the 2022–2024 period in Chapter V, Exemption from Work Obligations. This document explains the stipulations of annual leave, maternity leave, menstruation leave, and others. Where these provisions refer to the applicable regulations.

The company shows documents granting leave to workers as follows:

- An employee's annual leave application form with the initials ASR who applies for 1 day of leave of the total remaining 8 days of leave entitlement The application was submitted on April 1, 2023, and was approved by the Estate Manager on April 1, 2023.
- Menstrual leave application form for workers with the initials STN who apply for 1 day of menstrual leave The application was submitted on March 24, 2023, and was approved by the Clinic Manager on March 23, 2023.
- Forms for maternity leave for workers with the initials P.M. who apply for maternity leave for a total of 45 days before giving birth and 45 days after giving birth The application was submitted on March 3, 2023, and was approved by the Estate Manager on March 3, 2023.

The company also guarantees the right to rest time for workers contained in the CLA documents for the 2022–2024 period in Article 15: Weekly Rest. In the document, it is explained how to determine the number of work breaks in a week that fall on Sundays. If there are workers who do their work on the orders of superiors on that day, it will be counted as overtime working days, and the calculation will adjust to the existing overtime provisions.

Based on the results of interviews with representatives of the gender committee, worker unions, and workers, it is known that the company has granted leave rights and fulfilled rest time rights. From the description above, it can be concluded that the company has given workers the right to rest and leave in accordance with applicable labour law.

### 6.5.3

Based on the interviews with gender committee representatives and field observations, it is known that the company has provided a certain place for breastfeeding at daycare with a special time for breastfeeding. There was no prohibition from supervisors in the field related to this matter.

The company has specifically provided for the need for new mothers or breastfeeding workers to breastfeed by setting a special time for breastfeeding at work, the availability of a special room for breastfeeding, and other supporting facilities. The Unit of Certification also showed the result of the new mother's needs identification by the Gender Committee. The company showed a questionnaire assessing the needs of postnatal mothers and assisting the growth and development of toddlers.

From the results of the assessment, several things were known as follows:

- Visiting services after birth delivery (childbirth period).
- Counselling visits and baby care services after delivery.
- Lactation/breastfeeding rooms in offices, daycares, and clinics.
- Providing time for breastfeeding and placement to work around housing, offices, clinics, or areas of land not far from breastfeeding places (up to 9 months of age).
- Children under 1 year old can be accepted at the day care.
- Early childhood education programs can accept students at the age of 2 years.
- Complementary food assistance for children under 3 years old (toddlers).

### 6.5.4

The complaint handling mechanism and system are described in SOP 1 regarding the procedure for submitting complaints under Revision 4 on October 25, 2021. Complaints can be submitted through recording in the logbook that has been provided, directly to the foreman, through the suggestion box, through the gender committee, worker unions, hotlines and emails provided by the certification unit, and via the RSPO website. This procedure has included a mechanism to handle employment grievances that respects anonymity and protects complainants where requested.

Based on the results of interviews with representatives of the working union and gender committee, it is known that the workers have understood the procedures and mechanisms for submitting complaints to the company. This is because the company has routinely socialized the procedure by posting warnings, complaints, and signposts related to this.

Based on the explanation above, it can be concluded that the certification unit has a complaint mechanism that guarantees the anonymity and protection of the complainant, which is known to all levels of workers and has been well documented.

**Status: Comply**



**6.6**
**No forms of forced or trafficked labour are used.**
**6.6.1**

The company established and documented a policy about forced or trafficked labor in its KLK Sustainability Policy on August 30, 2018. The company forbids child labor and forces labor, provides work contracts in a language that is understood by workers, and makes sure the payment is given to workers in simple ways, on time, and clearly.

The company has also shown that on each work agreement between the company and contractor or supplier, there were clauses related to fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the contractors. Some of these obligations are related to anti-bribery, anti-corruption, and anti-forced labor. To ensure compliance with these clauses, the certification unit always requests the requirements for completeness before the contractor does work.

Based on the results of interviews with the manpower agency, gender committee, labor union, and workers at estates and mills, there is no issue of discrimination or forced labor in the unit of Certification. There were no significant obstacles related to employment or violations of the company's regulations. The company provided output targets that could be obtained in 7 hours of work. If the harvester obtains more output within or more than 7 working hours, then the harvester will get the incentive payment. No penalty was given to the harvester if it did not get output due to natural factors such as rain. Based on the payment list, the harvesters have earned above the minimum wage.

There was no pressure or force to do overtime work; workers who had overtime at the unit of Certification could refuse if ordered to do overtime activities because overtime is not the worker's obligation. Based on interviews with workers, the labor union, and the gender committee, all work in the company was done voluntarily. There are no practices of retention of identity documents, payment of recruitment fees, contract substitution, lack of freedom to resign, debt bondage, or withholding of wages in the company.

**6.6.2**

The company has employee recruitment procedures explained in Worker Management in Sustainability SOP No. 29 Revision 5 on 13 January 2021. There was no discrimination between workers. The company has also socialized about its policy and procedure related to prohibition of worker discrimination in company to workers.

Based on the results of a review of employee list documents for May 2023, there are a total of 778 workers in the plantation unit. Out of a total of 778 workers, all of them are permanent workers. Based on the document review, it is known that all work that is permanent is carried out by permanent workers.

Based on the results of interviews with the Manpower Office, it is known that there are no contract or casual worker employed in permanent jobs. The company also shows documents for the appointment of contract employees to become permanent employees, for example:

**Anugerah Estate:**

- Letter of Senior Estate Manager Number: 001/PPA-ANUGERAH/PPK/II/2022 Dated February 21, 2022, concerning Changes in the status of contract employees to permanent employees totalling 104 UPKEEP/Maintenance Employees and 87 Harvest Employees.

**Bintang Estate**

- Letter of Senior Estate Manager Number: 001/PPA-BINTANG/PPK/II/2022 Dated February 21, 2022, concerning Changes in status of contract employees to permanent employees totalling 73 UPKEEP/Maintenance Employees and 70 Harvest Employees.

**Ceria Estate**

- Letter of Sr. Estate Manager Number: 021/PPA-CERIA/PPK/II/2022 dated February 24, 2022, concerning Notification of Appointment of permanent employees, to complete data for the appointment of permanent workers according to the published list:
  - Harvesting: 102 employees
  - Upkeep: 81 employees



Based on document verification, there are no migrant workers in this company. In addition, based on interview with worker union board sighted that so far, there has never been a penalty for termination of employment, bonded labor practices, withholding wages, and forced overtime.

**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 has identified those responsible for implementation of OHS program formed in P2K3 (guiding committee of occupational safety & health) based on decree of Manpower Agency Province of Lampung No 566/3871/P2K3/V.08/02 dated 09 June 2023 with secretary / OHS Expert on behalf of Nanang Setiawan (General OHS Expert No .99025/PK3/AJ/18/2022/PO dated 31 May 2022 with validity 3 (three) years from issued). In carrying out evaluation and monitoring related to the implementation of OSH in the company, the OHS organization holds regular meetings every month to ensure that the implementation of OSH runs as it should. In example meeting on 28 March 2023 with material discussed about risk analysis documents, PPE usages, training program and etc.

### 6.7.2

The company has an SOP related to emergency accidents in the Emergency response SOP Document number: SSOP 33, effective date: October 25, 2022, revision 1. This SOP contains categories of emergency response in the form of forest and land fires, building fires, chemical spills, natural disasters (floods), and internal audits and reviews.

Company has emergency facilities and infrastructure such as fire extinguisher, first aid kit, and other supporting equipment. Furthermore, based on field observation at estate, it is known that the contents of first aid box are available as determined by the company. As well as interviews with foreman in each estate that foreman are also able to explain the function of each tool in the first-aid box. Monitoring first aid kit has been conducted regularly every month, if there is use of it must be noted on the form provided, and first aid kit that is used it must be replenished and reported paramedic.

### 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 09 June 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 in each estate, it is known that 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 workers, which also includes Employment Assurance and Health Assurance participant numbers for a total of 778 workers. Based on a review of the May 2023 worker list document and proof of payment for Health Assurance and Employment Assurance for the same period, it is known that companies have registered and paid all their workers in the Health Assurance and Employment Assurance programs, which consist of work accident insurance, death benefits, Old Age Guarantee, and Pension Guarantee via Bank Transfer, with proof of payment as follows:

- Proof of payment for Employment BPJS for the period May 2023, which has been paid for a total of 743 workers on June 8, 2023, via bank transfer.
- Proof of Health Assurance payment for the May 2023 period, which was paid for 743 workers on June 8, 2023, via bank transfer.

The company has shown a list of Social Assurance membership for all employees, but there is a difference of 35 workers who have not been registered as of May 2023 due to the processing of Employment Assurance Company Registration Numbers at the BPJS Office. This is an opportunity for improvement for the company to ensure all workers are registered as BPJS participants. employment. Based on the results of interviews with harvesters and sprayers, it is known that the company has provided health insurance to workers and their families (wives and children) and employment guarantees to all workers.

The company has shown a list of BPJS membership for all employees, but there is a difference of 35 workers who have not been registered in May 2023 due to the processing of BPJS Employment Company Registration Numbers at the BPJS Office. This is an opportunity for improvement for the company to ensure that all workers are registered as BPJS Employment participants. (OFI)

#### 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 period 2022 LTA frequency rate are 46.4 and LTA severity rate are 112.4.

**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

Unit certification has shown the SOP document for OPT observation and control as contained in the Sustainability SSOP with number SSOP17. Integrated Pest Management and Control (IPM), which among others explains the following matters:

1. Main pests and diseases
2. Basics of integrated pest management and census criteria
3. Biological control
  - Planting beneficial plants
  - Owl
4. Cultural control
  - Planting cover crops
  - Manual control
  - Cutting and scattering of fallen trees
5. Chemical control is only carried out if the spread of destructive pests exceeds the threshold and uses approved pesticides.
6. Supervision
7. Census
8. Training.

The company shows the implementation of the Integrated Pest Management plan, for example as follows:

Beneficial Plant dan Gupon:

Company shows documentation related to the application of biological pest control, for example:

- Map of the Beneficial Plants Plan of Anugerah Estate Division I (Turnera) 238 bunds.
- Anugerah Estate Owl Nest distribution map.
- Anugerah Estate owl cage monitoring checklist.
- Map of the distribution of the Anugerah Estate Division I (Turnera) 238 bunds.

#### Pest Census

Company shows pest census records:

Anugerah Estate:

- Census of caterpillars eating oil palm leaves (UPDKS) for the period of May 2023 in Block G 17 totalling 11 types of Metisa plana with a record After Injection was done in early May 2023.
- The census of caterpillars that eat palm leaves (UPDKS) in block I17 January 2023 totalled 13 types of Sethosea, with a note that after injection.

**Bintang Estate:**

- The census of caterpillars that eat oil palm leaves (UPDKS) for the period of May 2023 in block M33 did not identify the *Sethosea* species, with a note that it was below the threshold.
- The census of oil palm leaf-eating pests (UPDKS) for the period May 2023 in block K33, a total of 3 trees were attacked by the *Oryctes* species, provided that they were sprayed with cyperin (spraying).

**Ceria Estate:**

- Summary of Those Attack Census as of July 08, 2022, Block B10 totalling 18 with notes that spraying is needed.
- Summary of UPDKS Attack Census May 31, 2023, Blocks C19 as many as 15 and C18 as many as 11 need to be sprayed.

Based on the results of field visits and interviews on pest control activities, it is known that pest control with chemicals is based on the results of pest attack detection and censuses.

Thus, it can be concluded that the company has an IPM plan implemented and monitored to ensure effective pest control.

**7.1.2**

Based on the results of the document review and field observations, it is known that the company has used *Tyto alba* as a natural enemy of pests and beneficial plants, including *Turnera subulata* and *antigonon*. All of these species are not classified as invasive species according to Minister of Environment and Forestry Regulation Number P.94/MENLHK/SETJEN/KUM.1/12/2016, so it can be concluded that there is no use of invasive species for pest control.

**7.1.3**

Unit certification already has a KLK sustainability policy of 30 August 2018 regarding the implementation of a strict No Burning policy in all KLK operations including new planting and replanting.

Based on a review of documents, field observations, and interviews with workers and external stakeholders, it is known that the company does not use fire for pest control.

**Status: Comply**

**7.2**

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

**7.2.1**

Based on the review of pesticide use list documents, for example in 2022, it is known that companies have used pesticides selectively to control target pests and weeds or diseases. Pesticides used for example as follows:

Trademark	Active ingredients	License number	LD50	WHO	Target
Basta	Glufosinate-Ammonium	RI.01030119921113	Acut Oral 4.853,6 mg/kg	II	to control weeds
Cyperin	Sipermetrin 250 G/L	RI.01010120052255	LD50 oral pada tikus: 231,9 mg/kg	II	to control pests
Dipel	Bacillus Thuringiensis	RI. 01010120186178	5000	III	to control caterpillar pests
Roundup	Ipa Glifosat 486 g/l	RI.01030120001560	>2000	III	to control weeds
Supremo 480 SL	Isoprofil Amina Glifosat 480 G/L	RI. 010301120021712	>5000	III	Broadleaf weed

**7.2.2**

Based on documents review the company has been recorded the pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications). For example on period of May 2023 as presented below:

- Ceria Estate division 1 for Supremo the total used is 170 Liter, with area applications 239 ha, active ingredients are 81.6 L; and number of applications are 1.

- Bintang Estate division 1 for Supremo the total used is 68 Liter, with area applications 90.48 ha, active ingredients are 23.28 L; and number of applications are 1.

### 7.2.3

Unit certification has reduced the use of pesticides, the company has integrated biological control into pest control, for example by using beneficial plants aimed at controlling palm leaf-eating caterpillar and *Tyto alba* for rat control. Based on the results of field observations on plantations, it is known that useful plants are in well-maintained conditions and are planted by the roadside.

### 7.2.4

#### Pest Census

Company shows pest census records:

Anugerah Estate:

- Census of palm leaf-eating pests (UPDKS) for the period of May 2023 in Block G 17 totalling 11 types of *Metisa plana* with a record After Injection was done in early May 2023.
- The census of caterpillars that eat palm leaves (UPDKS) in block I17 January 2023 totalled 13 types of *Setothosea*, with a note that after injection.

Bintang Estate:

- The census of caterpillars that eat oil palm leaves (UPDKS) for the period of May 2023 in block M33 did not identify the *Setothosea* species, with a note that it was below the threshold.
- The census of oil palm leaf-eating pests (UPDKS) for the period May 2023 in block K33, a total of 3 trees were attacked by the *Oryctes* species, provided that they were sprayed with cyperin (spraying).

Ceria Estate:

- Summary of Those Attack Census as of July 08, 2022, Block B10 totalling 18 with notes that spraying is needed.
- Summary of palm leaf-eating pests (UPDKS) Attack Census May 31, 2023, Blocks C19 as many as 15 and C18 as many as 11 need to be sprayed.

So, it can be concluded that there is no preventive use of pesticides by companies.

### 7.2.5

The company has a commitment to reduce pesticides in plantation operations, which is contained in the Pesticide Use Policy which was approved by the Director of Operations on July 10, 2018. This policy is a refinement of the Management Instruction dated December 19, 2016, regarding the termination of the purchase and use of Gramoxone. This pesticide policy states, among other things, that the IPM program, if possible, will use more environmentally friendly and more efficient use of biological and non-chemical methods. With this concept, the use of pesticides that are limited in nature such as paraquat is not used. Based on document verification, the company will not use paraquat and WHO Class 1A or 1B, or those registered by the Stockholm or Rotterdam Convention applications.

Based on the results of the review of the list of pesticides used in 2021 as well as the results of field observations to pesticide storage at , it was found that there was no use of pesticides (WHO groups 1A and 1B) or paraquat.

### 7.2.6

The company shows training records to personnel who handle pesticides, for example Training on Socialization of Technical Guidance on the Use and Application of Spraying at Bolk H/125 on 11 March 2022. The training participants were addressed to the spraying team from Anugerah Estate, Bintang Estate, Ceria Estate and Kasih Sejahtera. In addition, based on the results of interviews with spray workers, it was found that workers were able to briefly explain safety procedures for spraying activities.

Thus, it can be concluded that the company has shown evidence that work using pesticides has been performed by trained workers.

**7.2.7**

The results of field observations on chemical storage warehouses, it is known that chemical storage warehouses comply with Government Regulation number 74 of 2001 concerning Management of Hazardous and Toxic Materials. Among them are equipped with hazard symbols, ventilation, adequate lighting, emergency response facilities and infrastructure, process flow for receiving and dispensing chemicals, MSDS, pesticide storage grouped by type and available clean secondary containment.

**7.2.8**

The unit of certification already has procedure and work instruction regarding the management Hazardous Waste in the SSOP No. 23. revision 4, dated 2 May 2020. In detail, this procedure explains that;

- Used chemical packaging (including pesticides) reused for mixing of chemicals.
- Before used, the chemical packaging rinsed 3 times and labelled as reused waste.
- While the water used for washing used packaging will be reused for mixing chemicals.
- For packaging that is no longer used, the bottom of the used packaging must be punched.
- It is not permitted to ex chemical and oil packaging, nor all kinds of things that are classified as hazardous waste use in housing area.

Based on the results of a field visit to the Ceria Estate housing area, it was known that there were no traces of pesticide packaging that were reused, for example as water reservoirs or flower pots.

**7.2.9**

Based on the results of interviews with management representatives, it is known that the company does not spray pesticides through the air.

**7.2.10**

The company already has a Health examination plan for all employees, which is contained in the 2023 Occupational Health and Safety Management System (OHSMS) Plan document. Result of the medical examination on 09 June 2023 the total of workers checked are 259. Based on medical examination there is no workers suffered of health issues. The test covering cholinesterase, anamnesa, Laboratory check (Complete Blood Check) and optometry (sight) collaborated with Puri Husadatama Hospital. Special health checks are carried out for workers who work with chemicals such as fertilizer and spraying.

**7.2.11**

Unit certification has a policy that prohibits pregnant and lactating workers from working with chemicals regulated in SSOP 18. Safe Use and Storage of Chemicals including Hydrocarbons. Based on interviews with the spraying officers, it was found that there were no pregnant or lactating women workers working with pesticides.

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

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

**7.3.1**

The Unit of Certification already has procedure document related to waste management, stated in SSOP 23. Management of Toxic and Hazardous Waste and domestic, rev 4, dated 2 May 2020. This procedure explains the hazardous waste classification which follows the code, waste storage at divisions, waste storage at hazardous waste temporary storage, labelling, reporting, waste transportation outside the area, waste transportation security.

The identification of waste sources for the 2023 period with details: used pesticide packaging, medical waste, used iron, used fertilizer sacks, palm fronds, organic waste, an organic waste, paper waste, and residential waste water.

**Hazardous and Toxic Waste**

The storage permit is based on the Decree of the Head of the Investment and One-Stop Services Office No. 660/02/LBBB/IV.14/MSJ/2019 valid until 20 August 2019 for 5 (five) years.

Based on field observations at the licensed hazardous waste storage located at Estate Anugerah, it is known that the storage building is a permanent building with ventilation according to the coordinates on the permit. In addition, there are emergency response facilities such as fire extinguisher, eye wash, alarm, emergency response procedures, symbols and labels, sand powder to clean up spills, first aid kits, and a logbook.

In its management, PT Prima Alumga has a cooperation agreement as a party to collect and transport, namely **PT Manuppak Abadi** based on the document Number PPA/CR-EST.35/03/2023 dated 24 March 2023 which is valid until 31 March 2025. As for the types of waste that can be handled are used lubricating oil, used batteries, used filters, TL lamps, used pesticide containers, medical waste, used cartridges, used sacks, rags, and contaminated sand. For utilization and/ processing of waste, PT Manuppak Abadi as the transporter collaborates with advanced waste processors, namely **PT Wastec International** with work agreement Number 006/WI/SPKLB3T/III/2023 made on 3 March 2023 valid until 02 March 2024 .

From the results of a document review by comparing balances and logbooks, it can be seen that the submission of waste to storage for May 2023 has been appropriate and there is no difference in the amount submitted. Thus, it can be concluded that there are no recording errors and discrepancies based on the Balance Sheet, Logbook and Festronek documents, this shows that the company has properly documented the storage and handling of waste.

#### **Domestic Waste**

Domestic waste generated from housing and offices will be disposed of in Landfills. Afterward, liquid waste generated housing complex and office be managed on septic tanks.

#### **7.3.2**

PT Prima Alumga has implemented hazardous waste management in accordance with its procedures and PP Number 22 of 2021 and has carried out document reporting every quarter, including by;

- Recording and documenting the hazardous waste stored on a logbook and balance sheet for the period up to May 2023 the categories of types of waste stored; used oil, liquid contaminated waste, used batteries, filters, medical waste, used pesticide packaging, used fertilizer sacks, rags, contaminated sand, contaminated waste, used oil containers, used oil drums.
- Recording and documenting the hazardous waste handed over to the collectors and transporters in the form of festronek manifest evidence.

In its implementation, it can be proven that waste disposal is in accordance with procedures that are fully understood by workers, from the following documents:

- Document on Results of Identification of Waste Sources, updated on 12 October 2022 which provides information regarding sources of hazardous and domestic waste that have been identified by the company from plantations.
- Balance Sheet and Logbook for storing waste at hazardous waste. The recording is carried out to determine the incoming and outgoing waste and to determine the shelf life of waste at storage.
- Conduct socialization to employees which can be proven through minutes of socialization in the form of attendance and photos, for example;
  - Ceria Estate which was held on 17 February 2023 was attended by 12 participants.
  - Anugerah Estate which was held on 13 February 2023 was attended by 17 participants.
  - Bintang Estate which was held on 15 February 2023 was attended by 25 participants.
- OHS Completeness Monitoring Document for the 2023 period which informs the condition and completeness of emergency response facilities areas such as first aid kits, eye wash and shower checks, fire extinguishers, spill kits (sand powder) and alarms.
- Routine reporting of quarterly to District and/or Provincial Environmental Agency to related offices.

From the results of a field visit to the Ceria Estate and Anugerah Estate housing estates, no scattered trash was found. The results of interviews with workers in the Ceria Estate warehouse and workshop area show that they understand the practice of waste disposal, segregation, and the prohibition on the use of used chemical packaging.



**7.3.3**

The unit certification does not use open burning for waste disposal. It can be proven through document review and management interviews. Company has Sustainable Policy regarding open burning (point 1.3) *Implement a strict no burning policy in all Kuala Lumpur Kepong Berhard operations including new planting and replanting.*

It is also proven through the waste transportation manifest and the results of field observations in housing area there are no traces of burning waste in which there is residual plastic waste. Based on interview with residence in Ceria Estate housing area, they don't burn waste due to company policy and availability of good waste management.

<b>Status: Comply</b>
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**7.4**

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

**7.4.1**

Company shows procedures related to maintaining soil fertility, one of which is contained in the Sustainability Standard Operating Procedure (SSOP) document, SSOP 7. Seeding, Planting and Maintenance of Oil Palm Plants, revision 3 dated November 15 2021. At point C. Maintenance of oil palm plants includes explain about:

- **Circle Maintenance.**  
Plant plates should always be free of weeds and debris to facilitate picking of loose leaf and reduce nutrient uptake by weeds. Treatment is carried out by spraying the disks (3 times a year, with glyphosate herbicide 2 times and contact herbicide 1 time), scratching the disks (2 times a year, after budding).
- **Treatment of Oil Palm Land and Construction of LCC Ground Cover.**  
Immature plants weed management (spot spraying and weed eradication in disks); Eradication of weeds in mature plants (keep the plates clean and make it easier to collect loose fruit, guard the yards/markets with lawn mowers to increase accessibility); and Land Treatment Prior to Replanting (blocks to be replanted must be maintained until the last 1 year prior to logging for replanting).
- **Terrace Maintenance.**  
Terraces/orak are maintained by lifting landslides, returning them to the top of the terraces, with a rotation once a year. Rorak is maintained by removing the soil mass that enters the rorak. The beans that were creeping into the rorak were moved towards the fort.
- **Drainage Ditch Maintenance.**  
Lifting/digging the soil that covers the ditch, so that the size of the ditch remains as before, is done twice a year.
- **Water Level Maintenance.**  
Maintenance of the water level for existing plants in peat areas, the water level must be maintained at an average limit of 60 cm from the soil surface (range 50-75cm), through a network of water control structures, such as water embankments, sand bags, and etc.
- **Fertilization Based on the Results of Soil and Leaf Analysis.**  
Factors that need to be considered in determining the report are (soil, climate, results of fertilizer research, plant age, plant productivity, realization of 2 times a year fertilization, results of analysis of leaf and soil nutrients, and results of visual observations in the field).

Based on the results of the document review and field observations, it is known that several implementations have been carried out by the company, utilizing pruned fronds as an alternative source of nutrition.

**7.4.2**

The company shows records of 2022 leaf and soil analysis results for each Estate. The parameters analyzed include:

- Leaf: N, P, K, Mg, B
- Soil: pH, C-Organic, P, K, Ca, Mg, C.E.C

Soil Sampling Unit (SSU)

The results of the last soil analysis carried out in 2022 for Anugerah Estate, Bintang Estate, and Ceria Estate in October 2022 will be carried out by PT AARI (Applied Agricultural Resources Indonesia) by conducting soil tests for each plantation in 4 blocks. Soil analysis was carried out by analyzing soil texture, soil pH, and several other measured parameters.

#### Leaf Sampling Unit (LSU)

The results of the last leaf analysis were carried out in 2022 for Anugerah Estate, Bintang Estate, and Ceria Estate in the period August 2022 which was carried out by PT AARI (Applied Agricultural Resources Indonesia) with a total of 30 samplings in each plantation. For leaf analysis, several parameters were measured, namely: N, P, K, Mg, Ca, Mn, B, Zn, Cu, and Fe.

#### 7.4.3

Unit Certification only consists of plantations, namely Anugerah Estate, Bintang Estate, and Ceria Estate. So that this indicator cannot be applied.

#### 7.4.4

The company shows records of plans and realization of fertilization for each estate, for example for the period October 2022 - September 2023 the recommended and applied fertilizers include Kieserite, Muriate of Potash, Nitrogen (N) & Kalium (K) (17:28), Nitrogen (N) Fosfor (P) dan Kalium (K) . for example, Ceria Estate and Bintang Estate with the following details:

Unit	budget (Kg)	Application (Kg)
Ceria Estate	2.332,10	1.636,60
Bintang Estate	2.149,50	1.474,15

Realization of fertilizers applied according to recommendations and achievements in several units is still not 100% because the financial year is still ongoing.

**Status: Comply**

### 7.5

#### Practices minimize and control erosion and degradation of soils.

#### 7.5.1

The company shows a map informing the distribution of soil types and the slope level of PT Prima Alumga made by PT AARI with a scale of 1:75,000.

Based on a study of soil map documents and field observations, there is marginal soil with peat type with an area of 366.61 Ha with details of 353 Ha of planted area and 14.02 Ha of non-embedded area, and there are no areas with a slope of >40%. It is known that the land at PT Prima Alumga is flat and undulating with a slope (0-6°).

#### 7.5.2

Based on a review of the Area statement document, it is known that the replanting activity was carried out in 2010. Based on a study of soil map documents and field observations, there is marginal soil with peat type with an area of 366.61 Ha with details of 353 Ha of planted area and 14.02 Ha of non-Planted area, and there are no areas with slopes >40%. It is known that the land at PT Prima Alumga is flat and bumpy with a slope (0-6°).

#### 7.5.3

Based on the results of a document review and interviews with representatives of management, it is known that the company has not carried out any new planting or replanting 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

The company shows a map informing the distribution of soil types and the slope level of PT Prima Alumga made by PT AARI with a scale of 1:75,000.

Based on a study of soil map documents and field observations, there is marginal soil with peat type with an area of 366.61 Ha with details of 353 Ha of planted area and 14.02 Ha of non-embedded area, and there are no areas with a slope of >40%. It is known that the land at PT Prima Alumga is flat and undulating with a slope (0-6°).

#### 7.6.2

Based on the results of the study of area statement documents, information maps, interviews with company management and the results of field visits to each estate, it was found that there were no new planting activities in the areas managed by the company.

#### 7.6.3

Based on the results of the study of area statement documents, information maps, interviews with company management and the results of field visits to each estate, it was found that there were no new planting activities in the areas managed by the company.

<b>Status: Comply</b>
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### 7.7

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

#### 7.7.1

Based on a review of statement area documents and interviews with management, the company is no longer carrying out new plantings in existing plantation areas or opening new areas.

#### 7.7.2

Company showed a peat area inventory report to the RSPO on August 24, 2022, which explained the area of peat land in the company's operational area, wherein the report obtained information that the area of planted peatland was 353 Ha and the area not planted was 14.02 Ha.

Based on the results of a study of soil map documents and field observations, there is marginal soil with peat type with an area of 366.61 Ha with details of 353 Ha of planted area and 14.02 Ha of non-embedded area, and there are no areas with slopes >40%. It is known that the land at PT Prima Alumga is flat and bumpy with a slope (0-6°).

#### 7.7.3; 7.7.4

The unit of certification already has Sustainability Standard Operation Procedures (SSOP) related to technical guidelines for planting oil palm plantations on peatlands, contained in SSOP 7. Seeding, Planting and Maintenance of Oil Palm Plants, Revision 3 dated 15 November 2021, Letter D. Oil Palm Planting on Peatlands.

Based on the results of a study of soil type map documents, it is known that there is a peat area of PT Prima Alumga

- Mineral plant area : 7,376.21 Ha
- Peat plantation area : 353 Ha

Based on the results of a document review and interviews with management, it is known that the management of the peat area includes Peizometer measurements, subsidence stakes and water level calculations. Example as follows:

At that location a water level gauge was installed so that it could be monitored to maintain the water level at a level of 60-80 cm. The results of document inspection revealed that the company had 03 monitoring points. The results of the document review show that the water level is monitored periodically every day in the Water Level Measurement Daily Report. The results of the document inspection show that the water level is in the range of 40-60 cm. Monitoring can be shown for the period September 2022 – up to May 2023.

Subsidence or subsidence of peat occurs due to decomposition and/or compacting of drained peat soil. Subsidence is important to monitor because it is an indicator of successful management of water in peat areas. Based on the results of the document review, it is known that in the company's operational area there are 02 subsidy markers. During the audit, the monitoring results for the period September 2022 to May 2023 can be shown, which are set forth in the Monitoring Report for Peatland Subsidence. Based on monitoring results, it is known that the average decrease is around 0.9 cm/year.

Based on the description above, it can be concluded that the company made arrangements for lowering the peat soil layer in accordance with procedures and statutory regulations.

#### 7.7.5

There is no plan for replanting for the next 5 years for PT PPA in the certification unit. The year of the first oil palm planting was 2001 and the last planting year was 2013. The company has not yet carried out a replanting plan because the productivity of the 2001 plants was still high. So the Drainability assessment has not been carried out.

#### 7.7.6

Based on a study of soil map documents and field observations, there is a marginal soil type of peat with an area of 366.61 Ha with details of the planted area of 353 Ha and the non-embedded area of 14.02 Ha, and there are no areas with a slope >40%. The land cover at PT Prima Alumga is flat and wavy with a slope (0-6°) and nothing more.

At that location a water level gauge was installed so that it could be monitored to maintain the water level at a level of 60-80 cm. The results of document inspection revealed that the company had 03 monitoring points. The results of the document review show that the water level is monitored periodically every day in the Water Level Measurement Daily Report. The results of the document inspection show that the water level is in the range of 40-60 cm. Monitoring can be shown for the period September 2022 – up to May 2023.

Subsidence or subsidence of peat occurs due to decomposition and/or compacting of drained peat soil. Subsidence is important to monitor because it is an indicator of successful management of water in peat areas. Based on the results of the document review, it is known that in the company's operational area there are 02 subsidy markers. During the audit, the monitoring results for the period September 2022 to May 2023 can be shown, which are set forth in the Monitoring Report for Peatland Subsidence. Based on monitoring results, it is known that the average decrease is around 0.9 cm/year.

Based on the description above, it can be concluded that the company made arrangements for lowering the peat soil layer in accordance with procedures and statutory regulations.

#### 7.7.7

Based on the results of a review of peat inventory documents, it is known that there is no land reserved as a peatland conservation area, the entire area has been planted with oil palm, besides that there is no land acquisition for non-corporate land clearance areas at PT Prima Alumga.

<b>Status: Comply</b>
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### 7.8

#### Practices maintain the quality and availability of surface and ground water

##### 7.8.1

Geographically, PT Prima Alumga is located between three rivers, namely the Buaya River, Serdang River, and Mesuji River. However, from the map of water bodies in the unit certification area there are no natural rivers, only canals and ponds are identified. The company has a surface water quality monitoring program contained in the RKL-RPL matrix, which is managed and reported periodically every semester, including;

- Observing rainfall by recording every time it rains.
- Reforestation program in conservation areas.
- Patrols in order to monitor the occurrence of erosion in the river border area.
- Prohibition of the application of chemicals in the catchment area.
- Outreach to workers and the community regarding management of conservation areas.
- Conduct surface water quality sampling with reference to PP No. quality standards. 22 of 2021 attachment IV, with examples in semester 2 of 2022 with result all parameters of surface water quality has met the standards.
- Conduct sanitation water sampling for residential purposes with reference to the quality standards of Permenkes No. 32 of 2017 water for hygiene and sanitation purposes with samples for testing in semester 2 of 2022 with result all parameters of surface water quality has met the standards.

The results of interviews with resident in the housing area of Ceria Estate and Anugerah Estate revealed that there was no problem with availability of clean water, water was obtained free of charge, with the criteria of being odourless, colourless, and tasteless.

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

### 7.8.2

PT Prima Alumga has SOP for the maintenance of protected areas and areas of high conservation value SSOP 22, revision 2 concerning Identification, Management and Monitoring of Conservation Areas and Flora & Fauna dated 10 August 2017. The procedure contains matters as follows:

- For protection & management purposes, HCV areas must be delineated & mapped.
- The boundaries of the HCV area are marked and equipped with coordinate points.
- Riparian management are established along the river following the recommendations in the HCV report or following the boundaries set by the government or regulations. Install warning signs in the area.
- Prohibited from spraying and fertilizing and burning around the riparian area.
- Awareness through outreach to all personnel about the conservation area including the local community.
- Submitting reports on identification and monitoring of conservation areas to relevant agencies, in this case the Natural Resources Conservation Agency (BKSDA).

Geographically, PT Prima Alumga is located between three rivers, namely the Buaya River, Serdang River, and Mesuji River. However, from the map of water bodies in the unit certification area there are no natural rivers, only canals and ponds are identified.

Based on the results of field observations in Canal 1 Block D25 and Canal 3 Block I25 at Anugerah Estate, as well as Kiriko at Bintang Estate it is known that the canal and kiriko are artificial reservoirs, it can be seen that there is an HCV area information sign and no traces of application were found chemicals, there is no replanting in the HCV area, and there are efforts to enrich the species by planting local plants.

### 7.8.3

The scope of certification at PT Prima Alumga is Anugerah Estate, Bintang Estate, and Ceria Estate, and does not have a palm oil mill.

Based on management interviews and results of field visits, the company does not processed POME either for disposal or for application to land.

### 7.8.4

The scope of certification at PT Prima Alumga is Anugerah Estate, Bintang Estate, and Ceria Estate, and does not have a palm oil mill.

<b>Status: Comply</b>
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## 7.9

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

#### 7.9.1

Base on document verification SSOP 26. regarding GHG Mitigation, which explains the recording of emission sources, use of fossil fuels and targets for reducing the use of materials fossil fuel. The company shows data on fuel usage for the 2022 period, for diesel fuel 723,661 liters / year. Based on the results of the calculation of the efficiency of the use of fossil fuels from the previous year period, efficiency has been reached that is fuel usage has saved 70 % of diesel fuel.

The company has also made efforts to improve the efficiency of the use of fossil fuels in the transportation, among others by carrying out regular maintenance to reduce incomplete combustion and analyzing fuel use.

<b>Status: Comply</b>
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**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 and established a plan to reduce or minimize GHG emissions as described in SSOP 26. Greenhouse Gas Inventory and Mitigation on May 22, 2020 including:

- New Planting and Replanting contain provisions on avoiding planting on peat land and clearing land and cultivating without burning.
- Preventing Fires contains the prohibition of open burning including household waste, reducing and controlling incidents of fires (wildfires) – the existence of a Fire and Patrol Team, availability of fire towers and involving the community to play a role in fire prevention.
- Use of Fertilizer contains information on Fertilization based on the results of soil and leaf analysis and agronomic recommendations, Apply Best Management Practices to reduce fertilizer use such as timely application of fertilizer, planting cover crops, use of N fertilizer must comply with agronomic recommendations.
- Genset Usage contains scheduled maintenance to minimize diesel consumption and monitor solar usage.
- Use of biodiesel fuel.
- Monitoring of GHG emissions and their calculations consist of collecting data on the use of diesel fuel, fertilizers, agrochemicals, electricity, water, FFB production, waste production, etc. every month and calculating greenhouse gas emissions every year.

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

Based on the review of documents for example: monitoring of pesticide use, monitoring of diesel fuel, identification of HCVs and others it is found that accurate data have been entered into the RSPO palm oil GHG Calculator. GHG calculation using palm GHG Calculator 4.0. The summary of GHG emissions for the period January - December 2022, is listed as follows:

**FFB Supplier**

No	Supplier Name	FFB Production by Estate (t)	FFB Supplied by Estate (t)	Percentage of FFB (%)
1	Anugerah Estate	71713.00	71713.00	100.00
2	Bintang Estate	57633.00	57633.00	100.00
3	Ceria Estate	56214.00	56214.00	100.00

**Estate / Plantation Field Emissions and Sinks**

Description	Emission (tCO2e)			TOTAL
	Own	Group	3rd Party	
Emission Source				
Land Conversion	87837.93	0.00	0.00	87837.93
CO2 Emissions from Fertilizer	7652.16	0.00	0.00	7652.16
N2O Emissions from Peat	2639.40	0.00	0.00	2639.40
N2O Emissions from Fertilizer	5448.12	0.00	0.00	5448.12
Fuel Consumption	1211.22	0.00	0.00	1211.22
Peat Oxidation	19251.41	0.00	0.00	19251.41
Sinks				
Crop Sequestration	-71644.81	0.00	0.00	-71644.81
Sequestration in Conservation Area	0.00	0.00	0.00	0.00
Total	52395.43	0.00	0.00	52395.43

**7.10.2**



PT Prima Alumga is a takeover company and cleared land for oil palm plantations after owning the land in 2005. Based on PT Prima Alumga 2022 area statement document and LUC review report, it is known that PT Prima Alumga has not cleared land since 15 November 2018. However, there was land clearing in 2010 and 2014, for the LUCA process as explained in indicator 7.12.8

### 7.10.3

The company has identified source of waste pollution and emissions from Estate activities for the period 2023. Sighted the result of identification of emissions and pollution as well as its sources, such as in estate emissions sources are from fossil fuel usage for transportation and generator, emission from fertilizer usage, pesticide usage and electricity usage.

Monitoring for emission and pollutants (air emission and air ambient) from Estate was done periodically and comply with the standards quality, it's covered on RKL/RPL implementation report and reported to Environmental Agency of Mesuji Regency. Also using of fertilizer based on the results of soil and leaf analysis and agronomic recommendations, apply Best Management Practices. Therefore, it can conclude that the plans to reduce or minimize the pollutants are implemented and monitored well by management.

**Status: Comply**

### 7.11

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

#### 7.11.1

The unit of certification shows the procedures for clearing land contained in SSOP No. 33 concerning land fire emergency response which was passed on January 1, 2020. The procedure states that companies are committed to clearing land without burning. In addition, the Certification Unit also shows the updated KLK Group Sustainability Policy on 30 August 2018 which was validated by the CEO which states that the company strictly implements a zero-burning policy in all KLK operational areas including new planting and replanting activities.

#### 7.11.2

The company shows evidence that human resources are available that are capable of preventing and tackling land fires, which is shown, among other things, that a fire management unit organization has been formed, which was approved by Anton Akmalisyam on March 1, 2023, the emergency response organizational structure is as follows:

- Anugerah Estate Fire Management and Emergency Response Organizational Structure chaired by Didik Suseno with supporting structures such as deputy chairman, coordinator, firefighting team, evacuation team, first aid team, logistics, transportation, internal communications, external communications, and security.
- The Organizational Structure of the Bintang Estate Fire Management and Emergency Response, chaired by Purwanto, S.P
- Estate Ceria Fire Management and Emergency Response Organizational Structure chaired by Nurmatias with supporting structures such as deputy chairman, coordinator, firefighting team, evacuation team, first aid team, logistics, transportation, internal communications, external communications, and security.

In addition, the company has also provided training in collaboration with the Manggala Agni agency, from 20 to 25 February 2023, and can show proof of sample recording Certificate number SF 3.23/BPPI-Sum/SW-III/3/2023 given to Sugiarto as participants in the Basic Forest and Land Fire Control Training for PT. Prima Alumga which was held at the Training Center of PT. Prima Alumga from 20 to 25 February 2023. This certificate was ratified in Palembang, 6 March 2023 by Mr. Ferdian Krisnanto, S.Hut, MP as a representative from the Ministry of Environment and Forestry Directorate General of Control of Climate Change and Forest and Land Fires for the Sumatra Region.).

Based on the explanation above, it can be concluded that the company has Human Resources (HR) capable of preventing and dealing with land fires.

#### 7.11.3

The company has also provided training in collaboration with the Manggala Agni agency, from 20 to 25 February 2023 which was attended by Anugerah Estate, Bintang Estate, Ceria Estate, and Kasih Sejahtera as well as local community surrounding company. The unit of certification can show proof of sample recording. Certificate number SF 3.23/BPPI-Sum/SW-III/3/2023 was given to Sugiarto as a participant in Basic Forest and Land Fire Control Training for PT. Prima Alumga which was held at the Training Center of PT. Prima Alumga from 20 to 25 February 2023. This certificate was ratified in Palembang, 6 March 2023 by Mr. Ferdian Krisnanto,

S.Hut, MP as a representative from the Ministry of Environment and Forestry Directorate General of Control of Climate Change and Forest and Land Fires for the Sumatra Region).

**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

PT Prima Alumga is a take over company and cleared land for oil palm plantations after owning the land in 2005. Based on PT Prima Alumga 2022 area statement document and LUC review report, it is known that PT Prima Alumga has not cleared land since 15 November 2018. However, there was land clearing in 2010 and 2014, for the LUCA process as explained in indicator 7.12.8.

#### 7.12.2

The company already has the results of Identification of protected areas and areas of high conservation value which was carried out in December 2014 in collaboration with PT Sonokeling Accreditation Nusantara with an area of assessment of PT Prima Alumga's HGU area of 10,512.95 Ha, with an area for certification scope of 8,503.19 Ha.

Based on the results of the study and assessment, it was stated that there were no protected areas in PT Prima Alumga's HGU area, but only service buffer areas designated by the company as conservation areas, namely rivers and their borders covering an area of 108.82 Ha and a water storage area of 13.93 Ha. The total designated conservation area is 122.75 ha. With a total conservation area included in the scope of certification of 77.66 ha, excluding partnership estate.

Then the company measures *BPN* for the extension of *HGU* No. 13/Mesuji (before: 35/1996 North Lampung) located in Sungai Sidang and Sungai Cambai Villages, Rawa Jitu Utara and Mesuji Timur Districts, Mesuji Regency, Lampung Province on June 12, 2023. From the results of these measurements there was a change in the area of conservation, excluded Buaya River border area of 2.10 ha.

Based on document review, interviews with management, as well as field observations, the conservation area currently managed is **75.56 ha**. Based on the description above, companies are encouraged to review the HCV status with the area determined and the area managed. OFI

Based on the results of field visits to Canal 1 Block D25 and Canal 3 Block I25 at Anugerah Estate, it is known that the water flow is not natural, but water flow designed for agronomic purposes, there are spray limits and efforts to enhance the riparian areas by planting plants such as Pulai, Jackfruit, Mango, Sengon, and Bamboo.

#### 7.12.3

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

#### 7.12.4

In order to maintain protected areas and High Conservation Values, unit of certification has carried out activities which is contained in the management plan HCV of PT Prima Alumga for the 2023 period, that has been in line with its planning and reviewed periodically by management by involving relevant stakeholders, several activities including:

- Determining boundaries, installing stakes and signs for no cutting trees, no hunting, no burning, and no spraying, as well as monitoring these attributes.
- Routine outreach about the existence of conservation.
- Record and report the presence of wild animals when traces, excrement and sounds are found by workers or the community around the field.
- Conduct monitoring regarding the presence of invasive plants.
- Monitor the condition of natural vegetation species.
- Testing the quality of river water upstream and downstream.
- Conducting patrols to monitor erosion.

- Carry out natural vegetation enrichment by planting local trees.
- Conduct training to staff for conservation area management.

PT Prima Alumga has reports report on Management and Monitoring HCV of PT Prima Alumga including the existence of priority plants and animals which are submitted on a regular basis every semester as evidenced in 2022 period which were reported on 21 February 2023 to the BKSDA of Lampung Province, the Environmental Office of Mesuji Regency and Lampung Province, and the Lampung Province Plantation Service.

Related HCV and RTE species, unit of certification has developed in consultation and socialized with relevant stakeholders (e.g workers and the community around) which can be proven by the official report with the following description;

- Socialization to 39 participants from Anugerah Estate which was conducted on 22 June 2022.
- Socialization to 34 participants from Bintang Estate which was conducted on 15 July 2022.
- Socialization to 50 participants from Bintang Estate which was conducted on 21 June 2022.
- Socialization to 39 participants from representatives of the communities of Sungai Cambai Village, Makartitama Village, Bogatama Village, Sumber Jaya Village, Sidomukti Village, and Sidomekar Village which was conducted on 24 February 2023.

Furthermore, PT Prima Alumga has obtained the results of the Identification of Protected Areas and High Conservation Value Areas which was carried out in December 2014 in collaboration with PT Sonokeling Accreditation Nusantara with the scope of the assessment of PT Prima Alumga's HGU area of 10,512.95 Ha.

Based on the results of the study and assessment, it was stated that there were no protected areas in PT Prima Alumga's HGU area, but only service buffer areas designated by the company as conservation areas, namely rivers and their borders covering an area of 108.82 Ha and a water storage area of 13.93 Ha. The total designated conservation area is 122.75 Ha.

The area for the scope of certification is 8,504.29 Ha with a conservation area of 76.58 Ha.

There was a delineation when BPN measurements for the HGU Extension on June 12, 2023, namely a reduction of 2.10 Ha in the form of Sungai Buaya. So that the total area currently designated is 75.56 hectares, which consists of Watertgate Estate Ceria, Kanal 1, Kanal 2, Kanal 3, Satellite Pond, and Embung Kiriko 1 and 2 Bintang Estate.

Based on the description above, companies are encouraged to review the HCV status with the area determined and the area managed. (OFI)

### 7.12.5

Based on the 2014 HCV document review, HCV area maps, as well as interviews with village representatives and traditional leaders, it was found that there were no HCV areas that overlapped with community-owned land.

### 7.12.6

PT Prima Alumga has procedural documents regarding the maintenance of protected areas and areas of high conservation value which are contained in the document SSOP 22, revision 02 concerning Identification, Management and Monitoring of Conservation Areas and Flora & Fauna dated August 10, 2017. The procedure contains the following matters: following:

- For protection & management purposes, HCV areas must be delineated & mapped.
- Identification of flora & fauna focused on key species only (threatened, protected, endemic) and each.
- Prohibited from spraying and fertilizing and burning around the DSS area.
- Awareness through outreach to all personnel about the conservation area including the local community.
- Submitting reports on the identification and monitoring of conservation areas to the relevant agencies, in this case the Natural Resources Conservation Agency (BKSDA).

Unit of certification also has a flora and fauna monitoring program which is scheduled every year to update flora and fauna data found in the company area. Based on PT Prima Alumga's HCV Monitoring Report document, the results of identification of flora and fauna using the latest protection regulations, *Permen LHK* No. 106 of 2018 which are in the company area, include:

- Flora: Consists of 24 species of plants, 3 of which are *Acacia hybrid*, *Nypa fruticans*, and *Alstonia pneumatophore*.

- Fauna: Consists of 26 species of birds, 1 species of mammal, and 1 species of reptile. Of the 28 fauna identified, 22 of them have not been identified in the 2014 HCV report.
  - 1 species listed on the IUCN red list with Endangered status and 27 species with least concern status.
  - 3 species are listed in CITES under the category of appendix II, and 3 of them are also protected by *Permen LHK* No. 106 of 2018, namely *Elanus caeruleus*, *Macaca fascicularis*, and *Varanus salvator*.

Based on the results of interviews with representative of Desa Makartitama and employees at Ceria Estate, they also stated that they already know about the conservation and protection of HCV areas and the prohibition against hunting, logging and burning forests. Respondents added that the company also installed warning boards or signboards marking HCV areas and prohibitions on environmental destruction, which were forms of indirect socialization.

#### 7.12.7

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

- Record of HCV Patrol Report with document.
- Record of HCV Attribute Monitoring Report (sign board, spray limit sign, HCV stake).
- Records of Maintenance for the Rehabilitation of HCV Areas.
- Monitoring Records of flora and fauna species.

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

- Make documentation of each management and monitoring activity as evidence of activities and complement the reporting file.
- Conduct more intense monitoring of species from the class of mammals, reptiles and amphibians so as to allow for additional species.
- Repair damaged attributes in accordance with the existing management plan, because some attribute locations have started to break down.
- Provide socialization and direct monitoring of replanting activities in blocks where rivers are included in HCVs.

#### 7.12.8

PT Prima Alumga cleared land after November 2005 without prior HCV studies in 2014. Related to this, the company is required to complete the RaCP. During the audit it can be shown the RaCP process that has been going on;

- PT Prima Alumga submitted LUCA on 24 June 2022 to RSPO for a management area of 10,512.94 ha.
- There was a reply email from the RSPO regarding the LUCA review on 17 November 2022 from ([indrawan.suryadi@rspo.org](mailto:indrawan.suryadi@rspo.org)) which consolidated the PASS status on 15 November 2015, with the results of Final Conservation Liability (FCL) 0 ha, and Remediation 367.28 ha. Henceforth PT Prima Alumga has an obligation to submit Annex 8 – Remediation Plan to RSPO.
- There is evidence of delivery of Annex 8 – Remediation Plan to RSPO on 21 November 2022 for the remediation obligation of 367.28 ha. This remediation plan aims to rebuild the ecological functions and ecosystems of peatlands and riparian zones.
- There was a reply email from the RSPO ([rspocompensation@rspo.org](mailto:rspocompensation@rspo.org)) on 07 June 2023 informing them that this process is still waiting for a quorum from the results of the compensation panel and will be updated later. PT Prima Alumga has not been able to demonstrate the Remediation Plan procedures in accordance with Annex 8 approved by RSPO. **This becomes non-conformity No. 2023.01.**

7.12.8	Status: Non-conformity No. 2023.01 with Major Category
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**3.2 Conformity Checklist of Certificate and Trademark Use**

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

### 3.3 Summary of RSPO Partial Certification

Compliance of the uncertified management units of Kuala Lumpur Kepong Bhd 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.

Kuala Lumpur Kepong Bhd Time Bound Plan is explained in point 1.10. Kuala Lumpur Kepong Bhd has informed the Time Bound Plan progress, MUTU has considered that Kuala Lumpur Kepong Bhd is complied with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by Kuala Lumpur Kepong Bhd on 15 November 2022.

MUTU has verified partial certification for un-certified unit's subsidiary of Kuala Lumpur Kepong Bhd 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:

- There is no significant land conflicts which have not been declared above
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labour disputes that are not being resolved through an agreed process
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above
- Based on the results of the auditor's verification, all information related to units that have not been certified have been included in the company's own assessment.
- There is additional information related to several units that are no longer included in the company's timebound plan, for example: Mill1 (Malaysia) and PT Anugerah Surya Mandiri (Indonesia).

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>Positive assurance statement provided, which does include the new mill found in the revised time bound plan.</p> <p>Auditor verification: There is internal audit that has been conducted for uncertified unit :</p> <ul style="list-style-type: none"> <li>- PT Indonesia Plantation Synergy</li> <li>- PT Bumi Makmur Sejahtera Jaya</li> <li>- PT Prima Alumga</li> <li>- PT Karya Bakti Sejahtera Agrotama</li> <li>- PT Menteng Jaya Sawit Perdana</li> <li>- PT Prima Bahagia Permai</li> <li>- PT Sinergi Agro Industri</li> <li>- PT Tekukur Indah</li> </ul>
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)	<p>The Company has conducted HCV assessment for all subsidiaries where the assessment report confirms that there was no replacement of primary forest or containing HCV. Related to the new mills and newly acquired land are waiting for the concept plan to be approved.</p> <p>Auditor verification: Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided. The uncertified that follow RaCP is PT Menteng Jaya Sawit Perdana. For other uncertified unit, known that there is no new planting</p>



2.1.3	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<p>The newly acquired lands will adhere to the NPP procedures when it is ready. However, HCV assessment was conducted prior to development. There is new planting after January 2010 in PT PBJ which prior owned by other company. The NPP submission was not submitted by the previous owner, however HCV assessment was conducted prior to development.</p> <p>Auditor verification There is new planting after 2010 in PT Putra Bonga Jaya and this is uncertified unit will follow sanction. For the other uncertified unit, there is no new planting after 1 January 2010.</p>
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p>SIA conducted reported that there are land conflicts at some of the uncertified units and the company is handling through FPIC and grievance procedures.</p> <p>Auditor verification The company has procedure to resolve the land conflict which has explain that problem solving of conflict area.</p> <p>There is evidence of documented land dispute resolution for the uncertified units. No issue that obtains by web search.</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p>None noted. No stakeholder comments or complaints received.</p> <p>Auditor verification. There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries. The company has a mechanism for dealing with complaints.</p>
2.1.6	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1 (it has changed be Criterion 4.2 in P&C 2018).	<p>None noted. No stakeholder comments or complaints received.</p> <p>Auditor verification There's uncertified unit that still on HGU process:</p> <ul style="list-style-type: none"> <li>- PT Bumi Makmur Sejahtera</li> <li>- PT Menteng Jaya Sawit Perdana</li> </ul>

### 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 Initial Certification

NCR No.	:	2023.01	Issued by	:	Moh Arif Yusni
Date Issued	:	16 June 2023	Time Limit	:	15 June 2024
NC Grade	:	Major	Date of Closing	:	03 July 2023
Standard Ref. & Requirement	:	7.12.8 If there is land clearing which was not preceded by an HCV assessment since November 2005, or which was not preceded by an HCV-HCS assessment since November 15 2018, then the Remediation and Compensation Procedure (RaCP) shall apply.			
<b>Evidence observed (filled by auditor):</b> PT Prima Alumga cleared land after November 2005 without prior HCV studies in 2014. Related to this, the company is required to complete the RaCP. During the audit it can be shown the RaCP process that has been going on; <ul style="list-style-type: none"><li>PT Prima Alumga submitted LUCA on 24 June 2022 to RSPO for a management area of 10,512.94 ha</li><li>There was a reply email from the RSPO regarding the LUCA review on 17 November 2022 from (<a href="mailto:indrawan.suryadi@rspo.org">indrawan.suryadi@rspo.org</a>) which consolidated the PASS status on 15 November 2015, with the results of Final Conservation Liability (FCL) 0 ha, and Remediation 367.28 ha. Henceforth PT Prima Alumga has an obligation to submit Annex 8 – Remediation Plan to RSPO.</li><li>There is evidence of delivery of Annex 8 – Remediation Plan to RSPO on 21 November 2022 for the remediation obligation of 367.28 ha. This remediation plan aims to rebuild the ecological functions and ecosystems of peatlands and riparian zones.</li><li>There was a reply email from the RSPO (<a href="mailto:rspocompensation@rspo.org">rspocompensation@rspo.org</a>) on 07 June 2023 informing them that this process is still waiting for a quorum from the results of the compensation panel and will be updated later. PT Prima Alumga has not been able to demonstrate the Remediation Plan procedures in accordance with Annex 8 approved by RSPO.</li></ul>					
<b>Non-Conformance Description (filled by auditor):</b>  PT Prima Alumga has not been able to demonstrate the Remediation Plan procedures in accordance with Annex 8 approved by RSPO.					
<b>Root Cause Analysis (filled by organization audited):</b> RACP process undergo approval from RSPO					
<b>Correction (filled by organization audited):</b> Obtained approval from RSPO regarding compensation plan from RSPO					
<b>Corrective Action (filled by organization audited):</b> Carried out follow up more intensive to RSPO if any similar case					
<b>Assessor Evaluation and Conclusion (filled by auditor):</b>  <b>Auditor Verifications on 03 July 2023</b> The management unit has conducted a root cause analysis, made corrective actions and provided evidence of improvement in the form of an email from RSPO on 23 June 2023 informing that the Remediation Plan which was sent to RSPO in May 2023 has been approved by RSPO through the compensation panel, with a summary; <b>Conclusion</b> <u>The Remediation Plan is Endorsed.</u>  With this endorsement, the RaCP process for KLK - PT Prima Alumga (RaCP-4138) is <b>completed</b> . Please find the Annex 9: <u>Monitoring report template attached for your future reference.</u>					

### Recap of the submission:

- The remediation plan is for PT. Prima Alumga, with a total managed area of 10,512.95 Ha, located in Sungai Cambai, Sungai Sidang, and Sidang Gunung Tiga Village, Mesuji Regency, Lampung.
- Based on the LUCA review result (Pass status on Nov 2022), this unit has 0 Ha of FCL and 367.28 Ha of environmental remediation, which consist of 7.18 Ha of river buffer and 360.10 Ha of peat area.

Based on the above evidence, this nonconformity has been fulfilled and will be verified again during the ASA-1 audit by completing Annex 9: Monitoring report template for further processing.

<b>Verified by</b>	<b>:</b>	<b>Moh Arif Yusni</b>
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**3.4.2. Opportunity for Improvement**

No	Ref. Std.	Description
1	2.2.2	The company has monitored contractors that work with the company, however, at the time of the final inspection there were still contractors who had not fulfilled the relevant legal obligations because they were in the process of fulfilling them, so this created an opportunity for improvement for the company to ensure the fulfillment of relevant legal obligations for all contractors.
2	3.4.3	<p>PT Prima Alumga has carried out management which has been regularly reviewed and updated, namely through the 2022 SIA Review Minutes document on December 6, 2022, and evidence of its participation which was attended by the Head of Sumber Jaya Village, Makartitama Village, Anugerah Estate Manager, Bintang Estate Manager, Manager Estate Ceria, Senior Assistant, Sustainability Team, and Public Relations. Information was carried out through a questionnaire attached to the minutes.</p> <p>Based on the results of the document review, companies are encouraged to</p> <ul style="list-style-type: none"> <li>• Conduct a more in-depth mapping of key stakeholders, for example for external stakeholders by paying attention to women, migrants, local residents, youth leaders, contractors, including conflict victims and for internal stakeholders by paying attention to the representation of wider workers such as local workers, migrants, women, workers including contract workers.</li> <li>• Develop a questionnaire or information gathering model that informs the potential impact of the company's operational activities as a whole in accordance with the initial identification according to the level of importance and potential impacts that may arise.</li> </ul>
3	6.7.4	The company has shown a list of BPJS membership for all employees, but there is a difference of 35 workers who have not been registered in May 2023 due to the processing of BPJS Employment Company Registration Numbers at the BPJS Office. This is an opportunity for improvement for the company to ensure that all workers are registered as BPJS Employment participants.
4	7.12.4	<p>PT Prima Alumga has obtained the results of the Identification of Protected Areas and High Conservation Value Areas which was carried out in December 2014 in collaboration with PT Sonokeling Accreditation Nusantara with the scope of the assessment of PT Prima Alumga's HGU area of 10,512.95 Ha.</p> <p>Based on the results of the study and assessment, it was stated that there were no protected areas in PT Prima Alumga's HGU area, but only service buffer areas designated by the company as conservation areas, namely rivers and their borders covering an area of 108.82 Ha and a water storage area of 13.93 Ha. The total designated conservation area is 122.75 Ha.</p> <p>The area for the scope of certification is 8,504.29 Ha with a conservation area of 76.58 Ha.</p> <p>There was a delineation when BPN measurements for the HGU Extension on June 12, 2023, namely a reduction of 2.10 Ha in the form of Sungai Buaya. So that the total area currently designated is 75.56 hectares, which consists of Watergate Estate Ceria, Kanal 1, Kanal 2, Kanal 3, Satellite Pond, and Embung Kiriko 1 and 2 Bintang Estate.</p> <p>Based on the description above, companies are encouraged to review the HCV status with the area determined and the area managed.</p>

**3.4.3. Noteworthy Positive Components**

No	Description
1	Commitment to implement the principles of sustainable oil palm plantation management.
2	Teamwork and competent human resources in their respective fields.
3	The company no longer uses workers with daily and contract workers status
4	Positive response from the community around the company



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

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>Surrounding Village</b></p> <ul style="list-style-type: none"> <li>• <b>Mekartitama Village</b></li> <li>• <b>Wiratama Village</b></li> <li>• <b>Sungai Cambai Village</b></li> <li>• <b>Sungai Sidang Village</b></li> </ul> <p>The relationship between the company and the village is well established. The existence of the company is sufficient to help the community, starting from employment to CSR assistance provided by the company, ranging from assistance for religious activities, social activities, educational scholarships. Up to the repair and construction of roads.</p> <p>As of May 2023, there have been no fires around the company. In addition, until now there has been no land dispute between the company and the community. Every time there is a job vacancy, village representatives are always informed.</p> <p>So far there is no indication of pollution caused by the company's operations.</p>	<p>There are no negative issues that need further verification</p>
<p><b>PT Prima Alumga Workers' Union (SPSI).</b></p> <ul style="list-style-type: none"> <li>• Trade unions have been formed and are still actively organized today.</li> <li>• Bipartite meetings with companies and internal unions are held regularly, but if there are problems that can be discussed further.</li> <li>• The company has also socialized the freedom of association policy to workers in the plantations and factories to continue to join the union without any coercion and during the process of selecting/forming union officials, there was no intervention/interference by the company (the workers did independently).</li> <li>• The unit of certification has implemented minimum wage standards, overtime and others in accordance with government regulations. The labor union that is active in the plantation unit has been officially registered as the PT Prima Alumga workers' union.</li> <li>• Bipartite meeting related to discussion of PKB to be held on 27-28 July 2022.</li> </ul>	<p>There have been no negative events/issues that have occurred in the company over the past year related to the employment system. The company has fully provided workers' rights in accordance with applicable regulations.</p>
<p><b>Local Contractor</b> PT Deffa Citra Lampung</p> <ul style="list-style-type: none"> <li>• Collaborated since 2017 (Heavy Equipment Rental)</li> <li>• Annual contract, signed on stamp duty</li> <li>• Requirements for completeness of vehicle documents</li> <li>• Prohibiting bribery &amp; corruption practices in company cooperation &amp; operations.</li> </ul>	<p>There are no negative issues that need further verification.</p>



Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> <li>• Availability of Personal Protective Equipment (helmet and shoes)</li> <li>• BPJS TK and Health insurance for operators</li> <li>• Operator wages based on minimum wages and overtime are paid according to regulations</li> <li>• Payments have gone smoothly so far, no delays.</li> <li>• The positive impact of the presence of PT Prima Alumga is that it creates employment opportunities for the local community.</li> </ul>	
<b>Head of the Tunas Harapan Employee Cooperative</b> <ul style="list-style-type: none"> <li>• The current routine activities of the cooperative include: The business of procuring materials for daily household needs and procuring paper stationery for the office, savings and loans for cooperative members (mandatory savings of Rp. 200,000 &amp; voluntary savings of Rp. 50,000) and provision of groceries.</li> <li>• The distribution of the remaining operating results (SHU) is carried out at the end of each year.</li> <li>• The Annual Member Meeting (RAT) for the 2022 fiscal year was held on April 14, 2023.</li> <li>• The current number of Cooperative Members is 132 people.</li> <li>• Currently the management of the cooperative is exploring establishing a Clean Water Depot business for employees of PT Prima Alumga.</li> </ul>	There are no negative issues that need further verification.
<b>Gender Committee</b> <ul style="list-style-type: none"> <li>• The company has provided socialization regarding policies on preventing sexual harassment and violence and policies on protecting reproductive rights</li> <li>• There have been no complaints regarding sexual harassment and violence in the last 1 year</li> <li>• The company identifies the needs of new mothers who have given birth.</li> <li>• There were no complaints such as discrimination or other complaints.</li> </ul>	There was no negative issue that need further verification.
<b>Mesuji District Environmental Office</b> <ul style="list-style-type: none"> <li>• No issues related to environmental pollution</li> <li>• Communication is well established</li> <li>• Regarding permits, all of them are still valid according to now.</li> <li>• Mandatory reports have been done in an orderly manner, such as fire reports, RKL/RPL reports and others</li> </ul>	There was no negative issue that need further verification.
<b>Plantation and Agriculture Office of Mesuji Regency</b> <ul style="list-style-type: none"> <li>• There have been no complaints from the community regarding land disputes</li> <li>• Compulsory reports have been carried out in an orderly manner, such as fire reports, plantation business development reports and others</li> </ul>	There was no negative issue that need further verification.

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> <li>• Communication is well established</li> <li>• Availability of fire control facilities and infrastructure is good</li> <li>• There are no reports of fire incidents, hotspots and others</li> <li>• There were no complaints regarding CSR</li> </ul>	
<b>Mesuji District Manpower and Transmigration Office</b> <ul style="list-style-type: none"> <li>• Bipartite issues have been resolved in a bipartite manner</li> <li>• Industrial/labor relations have been well established</li> <li>• Coordination with agencies has been going well</li> <li>• Providing/responding to information has been carried out properly</li> <li>• There are no crucial issues</li> <li>• The company is considered good in terms of administration</li> <li>• There were no complaints from the Trade Unions</li> <li>• The company maintains good communication</li> <li>• Wages refer to the UMK Mesuji</li> <li>• There are foreign workers</li> <li>• Labor reporting has been carried out in an orderly manner</li> </ul>	<p>There was no negative issue that need further verification.</p>
<b>Koperasi Produsen Mesuji Sejahtera</b> <p>The certification unit has made efforts to develop the surrounding community through scheme smallholders' programs.</p> <p>FFB payment is according to FFB price determined by Plantation Agency of Lampung Province. There is no complaint about late payment. Communication between the Cooperative and the Company is going well. If there is a complaint, it will be reported to the PIC of the Company.</p>	<p>There was no negative issue that need further verification.</p>

<b>4.0</b>	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>
<b>4.1</b>	<b>Formal Sign-off of Assessment Findings</b>
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end; margin-top: 100px;"> <div style="text-align: center;"> <p>PT Prima Alumga Management Representative</p>  <p><b>Juhari Bin Ahmad</b> Monday, 03 July 2023</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><b>Moh Arif Yusni</b> Monday, 03 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	Mekartitama Village	Mesuji Regency	-	Direct Interview	13 June 2023	√	
2	Wiratama Village	Mesuji Regency	-	Direct Interview	13 June 2023	√	
3	Sungai Cambai Village	Mesuji Regency	-	Direct Interview	13 June 2023	√	
4	Sungai Sidang Village	Mesuji Regency	-	Direct Interview	13 June 2023	√	
5	PT Prima Alumga Workers' Union (SPSI).	Mesuji Regency	-	Direct Interview	13 June 2023	√	
6	PT Deffa Citra Lampung	Mesuji Regency	-	Direct Interview	13 June 2023	√	
7	Head of the Tunas Harapan Employee Cooperative	Mesuji Regency	-	Direct Interview	13 June 2023	√	
8	Gender Committee	Mesuji Regency	-	Direct Interview	13 June 2023	√	
9	Mesuji District Environmental Office	Mesuji Regency	-	Direct Interview	13 June 2023	√	
10	Plantation and Agriculture Office of Mesuji Regency	Mesuji Regency	-	Direct Interview	13 June 2023	√	
11	Mesuji District Manpower and Transmigration Office	Mesuji Regency	-	Direct Interview	13 June 2023	√	
12	Koperasi Produsen Mesuji Sejahtera	Mesuji Regency	-	Direct Interview	13 June 2023	√	
13	<b>Anugerah Estate</b> <ul style="list-style-type: none"> <li>• 1 warehouse operator</li> <li>• 1 pesticide mixing officer.</li> <li>• 1 doctor and 1 paramedic</li> <li>• 4 fertilizer workers and 1 foreman</li> <li>• 5 spray workers and 1 foreman</li> <li>• 3 harvest workers and 1 foreman</li> <li>• 2 oil palm contractors</li> <li>• 2 FFB loading workers</li> </ul>	PT Prima Alumga	-	Direct Interview	13 June 2023	√	
14	<b>Bintang Estate</b> <ul style="list-style-type: none"> <li>• 10 spray workers and 1 foreman</li> <li>• 3 harvest workers and 1 foreman</li> <li>• 3 manual workers</li> <li>• 2 workers load mechanical fertilizer.</li> </ul>	PT Prima Alumga	-	Direct Interview	14 June 2023	√	
15	<b>Ceria Estate</b> <ul style="list-style-type: none"> <li>• 1 warehouse operator</li> <li>• 1 mechanic</li> <li>• 1 pesticide mixing officer.</li> <li>• 1 generator operator</li> <li>• 3 occupants of the housing</li> </ul>	PT Prima Alumga	-	Direct Interview	15 June 2023	√	

16	WWF Indonesia	Indonesia	<a href="mailto:wwf-indonesia@wwf.or.id">wwf-indonesia@wwf.or.id</a>	Email	5 June 2023		√
17	Walhi Aceh	Indonesia	<a href="mailto:informasi@walhi.or.id">informasi@walhi.or.id</a>	Email	5 June 2023		√
18	AMAN	Indonesia	<a href="mailto:info@sawitwatch.or.id">info@sawitwatch.or.id</a>	Email	5 June 2023		√
19	Sawit Watch	Indonesia	<a href="mailto:wwf-indonesia@wwf.or.id">wwf-indonesia@wwf.or.id</a>	Email	5 June 2023		√

**Appendix 2. Assessment Program**

DATE	12 – 17 June 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 12 June 2023		
07.45 – 08.00	JAKARTA → LAMPUNG	All Auditor
08.30 – 12.00	LAMPUNG → MESUJI REGENCY	RAN / IAB
13.00 – 16.00	public consultation with stakeholder to relevant agency in Mesuji Regency	
08.30 – 12.00	LAMPUNG → PT PRIMA ALUMGA	MAY / ALS
14.00 – 15.00	<b>Opening meeting</b> <ul style="list-style-type: none"><li>Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li><li>Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li></ul>	
15.00 - 17.00	<ul style="list-style-type: none"><li>Verification of Basic Information Estate</li><li>Confirmation of Time Bound Plan</li><li>Verifikasi Partial Certification // Review of Partial Certification</li></ul>	
Tuesday, 13 June 2023		
08.00 – 12.00	Stakeholder Consultation <ul style="list-style-type: none"><li>Stakeholder consultation to affected communities surrounding the plantations and previous land owner</li></ul>	MAY
08.00 – 12.00	Field Observation to ANUGERAH ESTATE Aspect to be verified : <ul style="list-style-type: none"><li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li><li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li><li>Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li><li>Implementation of Occupational Health &amp; Safety Aspect</li><li>Implementation of Employment Procedure and Mechanism Aspect</li><li>Observation of Workers Facilities (Housing, School, Worship Place).</li></ul>	<ul style="list-style-type: none"><li>ALS</li><li>RAN / SAS</li><li>ALS</li><li>RAN / SAS</li><li>RAN / SAS</li><li>ALS</li></ul>
12.00 – 14.00	Break	
14.00 – 16.30	<ul style="list-style-type: none"><li>Verification of stakeholder consultation result and field visit.</li><li>Document review and completing audit checklist.</li><li>Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier</li></ul>	All Auditor
16.30 – 17.00	Presentation of Daily Progress	All Auditor



DATE	12 – 17 June 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Wednesday, 14 June 2023		
08.00 – 12.00	Stakeholder Consultation <ul style="list-style-type: none"><li>Stakeholder consultation to affected communities surrounding the plantations and previous land owner</li></ul>	RAN
08.00 – 12.00	Field Observation to BINTANG ESTATE Aspect to be verified : <ul style="list-style-type: none"><li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li><li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li><li>Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li><li>Implementation of Occupational Health &amp; Safety Aspect</li><li>Implementation of Employment Procedure and Mechanism Aspect</li><li>Observation of Workers Facilities (Housing, School, Worship Place).</li></ul>	<ul style="list-style-type: none"><li>MAY / ALS</li><li>SAS</li><li>SAS</li><li>MAY / SAS</li><li>MAY / SAS</li><li>SAS</li></ul>
12.00 – 14.00	Break	
14.00 – 16.15	<ul style="list-style-type: none"><li>Verification of stakeholder consultation result and field visit.</li><li>Document review and completing audit checklist.</li></ul>	All Auditor
16.15 – 17.00	<ul style="list-style-type: none"><li>Presentation of Daily Progress</li></ul>	
Thursday, 15 June 2023		
08.00 – 12.00	Field Observation to CERIA ESTATE Aspect to be verified : <ul style="list-style-type: none"><li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li><li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li><li>Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li><li>Implementation of Occupational Health &amp; Safety Aspect</li><li>Implementation of Employment Procedure and Mechanism Aspect</li><li>Observation of Workers Facilities (Housing, School, Worship Place).</li></ul>	<ul style="list-style-type: none"><li>MAY</li><li>SAS/ALS</li><li>SAS/ALS</li><li>MAY</li><li>MAY</li><li>RAN</li></ul>
12.00 – 14.00	<ul style="list-style-type: none"><li>Break</li></ul>	
17.00 – 16.15	<ul style="list-style-type: none"><li>Verification of stakeholder consultation result and field visit.</li><li>Document review and completing audit checklist.</li></ul>	All Auditor
16.15 – 17.00	<ul style="list-style-type: none"><li>Presentation of Daily Progress</li></ul>	
Friday, 16 June 2023		

DATE	12 – 17 June 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 11.30	Document review and completing audit checklist.	All Auditor
12.00 – 15.00	Internal discussion by auditor team preparing for Closing Meeting	All Auditor
15.00 – 16.00	<b>Closing Meeting</b> <ul style="list-style-type: none"> <li>• Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion)/</li> <li>• Comments, Responses and Questions</li> </ul>	
17.30 -	PT PRIMA ALUMGA → LAMPUNG	All Auditor
<b>Saturday, 17 June 2023</b>		
10.00 -	Lampung → Jakarta	All Auditor