

***Roundtable on Sustainable Palm Oil Certification
RSPO*****[✓] Surveillance**

Name of Management Organisation : **Palm Oil Mill 7 subsidiary of PT Dharma Satya Nusantara, Tbk.**
Plantation Name : PT Karya Prima Agro Sejahtera (Long Teman Estate & Kemitraan 9)
PT Dewata Sawit Nusantara (Kemitraan 7)
Location : Miau Baru Village, Kongbeng Sub District, Kutai Timur District,
Kalimantan Timur Province, Indonesia.
Certificate Code : **MUTU-RSPO/156**
Date of Certificate Issue : 02 July 2021 Date of License Issue : 02 October 2023
Date of Certificate Expiry : 01 July 2026 Date of License Expiry : 01 July 2024

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-2	10 to 15 April 2023	Briyogi Shadiwa (Lead Auditor RSPO Witnessing), Rahmat Abdiansyah (Lead Auditor RSPO Witnessed), Septian Maulana, Firda Tarunajaya and Harry Wahyudi.	Moh Arif Yusni	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-2	04 September 2023

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Figure 1. Location Map of POM 7 – PT Dharma Satya Nusantara, Tbk

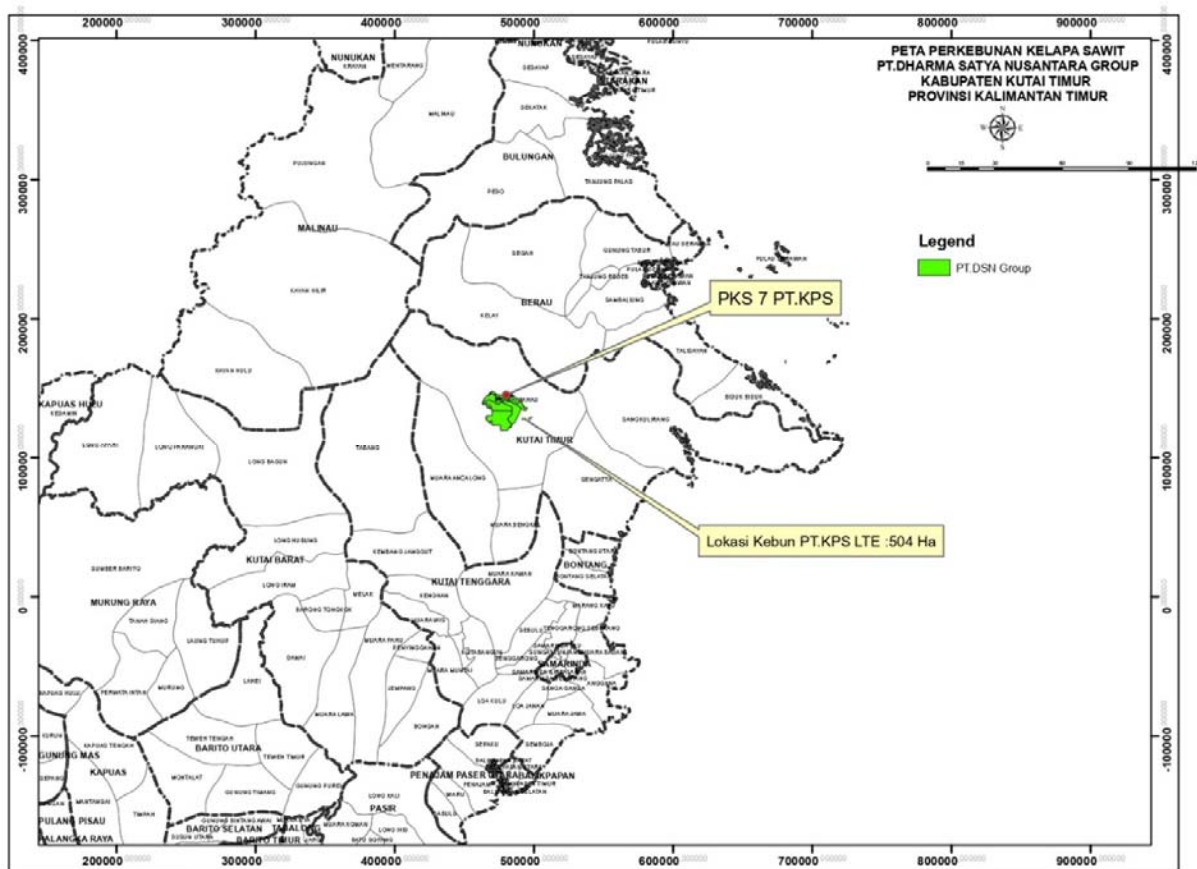


Figure 2. Operational Map of POM 7 – PT Dharma Satya Nusantara, Tbk

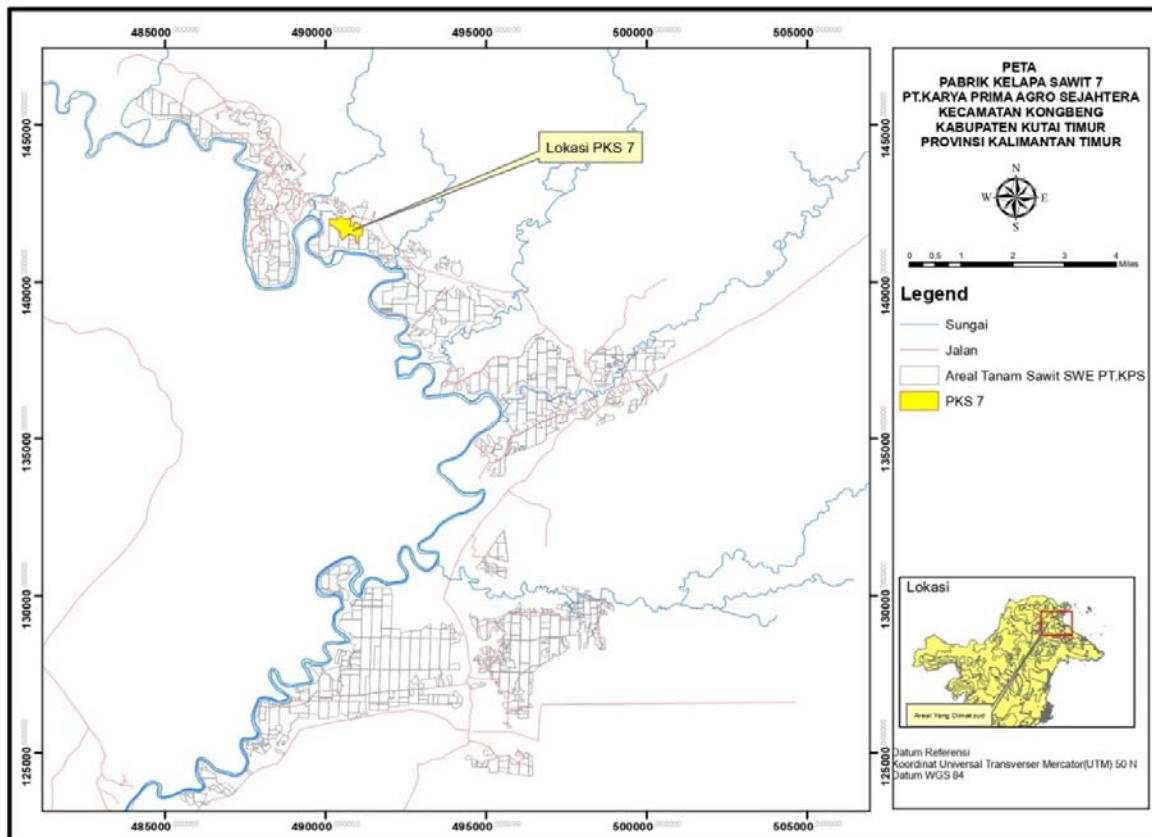


Figure 3. Operational Map of Long Teman Estate – PT Karya Prima Agro Sejahtera

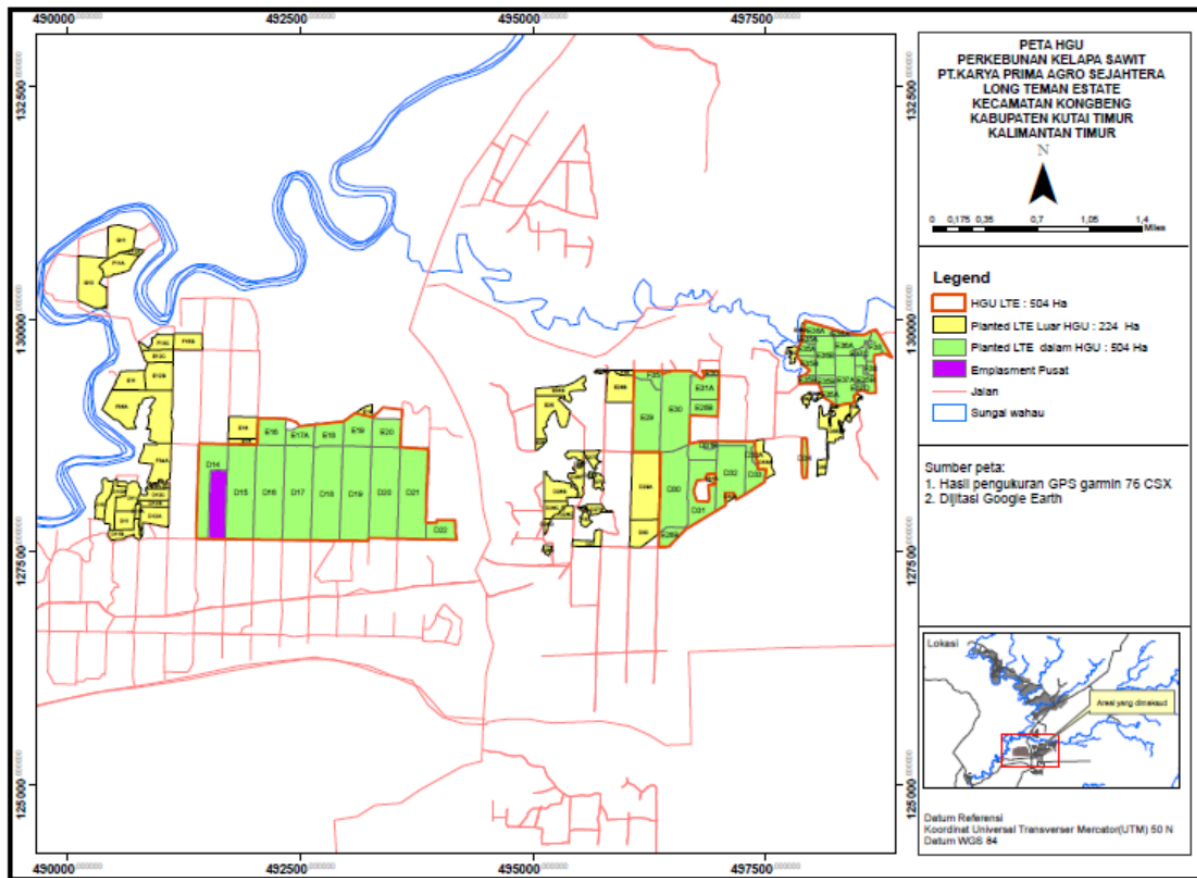


Figure 4. Operational Map of Kemitraan 9

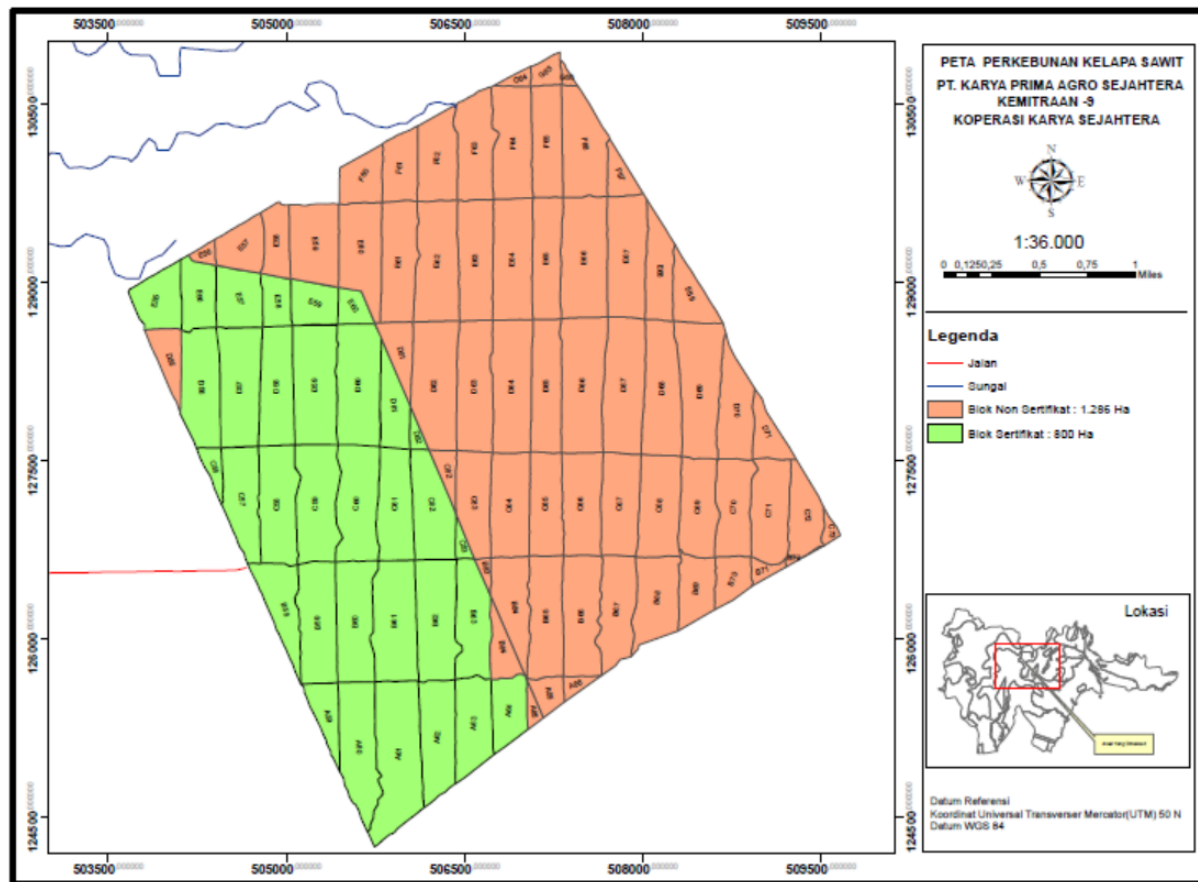
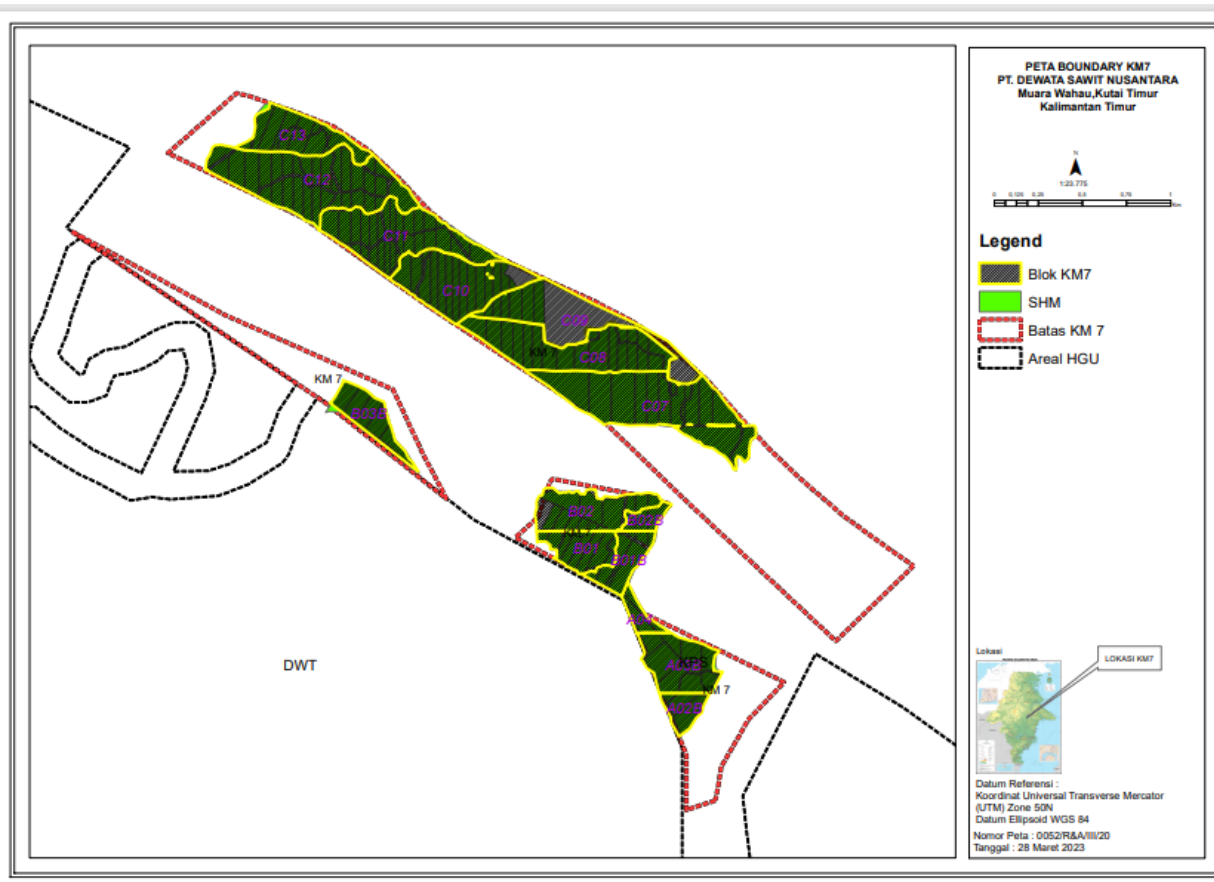


Figure 5. Operational Map of Kemitraan 7



Abbreviations Used

AMDAL	:	Analisis Mengenai Dampak Lingkungan
BOD	:	Biological Oxygen Demand
BPHTB	:	<i>Bea Perolehan Hak Atas Tanah dan Bangunan</i>
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i>
CH	:	Certification Holder
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
DLH	:	Dinas Lingkungan Hidup
DPLH	:	<i>Dokumen Pengelolaan Lingkungan Hidup</i>
DSN	:	Dharma Satya Nusantara
EFB	:	Empty Fruit Bunch
EIA	:	Environmental Impact Assessment
FGD	:	Focus Group Discussion
FFB	:	Fresh Fruit Bunch
FPIC	:	Free Prior Inform and Consent
FR	:	Frequency Rate
GHG	:	Green House Gas
HCV	:	High Conservation Value
HGB	:	<i>Hak Guna Bangunan / Building Title</i>
HGU	:	<i>Hak Guna Usaha / Land Use Title</i>
HIRAC	:	Hazard Identification Risk Assessment and Control
IPM	:	Integrated Pest Management
ISCC	:	International Sustainability & Carbon Certification
IUCN	:	International Union for Conservation of Nature and Natural Resources
KKPA	:	<i>Koperasi Kredit Primer Anggota</i>
KM 9	:	Kemitraan 9
KPAS	:	Karya Prima Agro Sejahtera
KT	:	<i>Kelompok Tani Farmer Group</i>
KTPA	:	<i>Kelompok Tani Peduli Api</i>
KUD	:	<i>Koperasi Unit Desa / Cooperative Village Unit</i>
LSU	:	Leaf Sampling Unit
LTE	:	Long Teman Estate
LUC	:	Land Use Change
MSDS	:	Material Safety Data Sheet
OER	:	Oil Extraction Rate
OFI	:	Opportunity for improvement
OHS	:	Occupational Health and Safety
P & C	:	Principle & Criteria
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja/OHS Committee</i>
PIC	:	Person In Charge
PK	:	Palm Kernel
PKB	:	<i>Perjanjian Kerja Bersama (Collective Labor Agreement)</i>
PMPTSP	:	<i>Penanaman Modal & Pelayanan Terpadu Satu Pintu</i>
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personnel Protective Equipment
PT	:	<i>Pekerja Tetap (Permanent Worker)</i>

PUPR	:	<i>Pekerjaan Umum dan Perumahan Rakyat</i>
RKL RPL	:	<i>Rencana Pengelolaan Lingkungan – Rencana Pemantauan Lingkungan</i> (Environment Management and Monitoring Plan)
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened, Endangered
RTRWP	:	<i>Rencana Tata Ruang Wilayah Provinsi</i> Province Spatial Plan
SBU	:	Strategic Business Unit
SCCS	:	Supply Chain Certification System
SEIA	:	Social & Environmental Impact Assessment
SHM	:	<i>Sertifikat Hak Milik</i>
SIA	:	Social Impact Assessment
SKU	:	<i>Syarat Kerja Umum</i> / Permanent Workers
SOP	:	Standard Operational Procedure
SPO	:	Sustainable Palm Oil
SR	:	Severity Rate
SSU	:	Soil Sampling Unit
TBP	:	Time Bound Plan
UoC	:	Unit of certification
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE OF THE CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used		
		<ul style="list-style-type: none">RSPO Certifications Systems for Principles & Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020).Indonesia National Interpretation RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSPO Board of Governors on 20th April 2020.	
1.2	Organisation Information		
1.2.1	Organization name listed in the certificate	POM 7 subsidiary of PT Dharma Satya Nusantara, Tbk	
1.2.2	Contact person	Agustinus Triwibowo	
1.2.3	Organisation address and site address	Central Office register at RSPO: Jl. Rawa Gelam V Kav. OR/3B, Kawasan Industri Pulo Gadung, Jakarta, Indonesia	
1.2.4	Telephone	+62-21-4618135	
1.2.5	Fax	+62-21-46834865	
1.2.6	E-mail	agustinus.triwibowo@dsn.co.id	
1.2.7	Web page address	www.dsn.co.id	
1.2.8	Management Representative who completed the application for certification	Agustinus Triwibowo	
1.2.9	Registered as RSPO member	1-0135-12-000-00 dated on 2 Juli 2008	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	1 POM (POM 7) with 2 supply bases: Long Teman Estate and Kemitraan 9 <i>Note:</i> <i>In this assessment there is a ext.scope in the supply base of POM 7 i.e Kemitraan 7.</i>	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude (S)Longitude I
	POM 7	Miau Baru Village, Kongbeng Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	N 01° 17' 5" E 116° 55' 1"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude (S)Longitude I
	Long Teman Estate	Miau Baru Village, Kongbeng Sub District,	N 01° 10' 53" E 116° 49' 44"

		Kutai Timur District, Kalimantan Timur Province, Indonesia			
	Kemitraan 9 (1,000 members)	Miau Baru Village, Kongbeng Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	N 01° 09' 21"	E 116° 55' 27"	
	Kemitraan 7 (149 members)	Miau Baru Village, Kongbeng Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	N 01° 18' 36.5 "	E 116° 53' 00.3"	
1.5	Description of Area Statement				
1.5.1	Tenure				
	• State				
	- HGU		504.50	Ha	
	- HGB		2.80	Ha	
	• Community				
	- SHM		987	Ha	
	Total		Ha		
1.5.2	Area Statement				
	Description	Long Teman Estate	Kemitraan 9	Kemitraan 7	TOTAL
	Total area	507.30	800.00	187.00	1,494.30 Ha
	Mature Area	477.00	800.00	187.00	1,464.00 Ha
	Mill	2.80	-	-	2.80 Ha
	Housing and Infrastructure	25.30	-	-	25.30 Ha
	HCV	2.20	-	-	2.20 Ha
1.6	Planting Year and Cycles				
1.6.1	Age profile of planting year				
	Planting Year	Long Teman Estate (Ha)	Kemitraan 9 (Ha)	Kemitraan 7 (Ha)	Total (Ha)
	2007	-	286.00		286.00
	2008	299.00	454.00		753.00
	2009	109.00	60.00		169.00
	2010	46.00	-		46.00
	2011	2.00	-		2.00
	2012	17.00	-	20.00	37.00
	2014	2.00	-	137.00	139.00
	2015	2.00	-	30.00	32.00
	TOTAL	477.00	800.00	187.00	1,464.00
1.6.2	New Planting area after January 2010		256 Ha		
1.6.3	Planting Cycle		1 st Cycle		
1.7	Description of Mill and Supply Base				
1.7.1	Description of Mill				

	<table><tr><th rowspan="2">Name of Mill</th><th rowspan="2">Capacity (tonnes/ hour)</th><th rowspan="2">FFB Processed (tonnes/year)</th><th colspan="2">CPO</th><th colspan="2">Palm Kernel</th></tr><tr><th>Out put (tonnes)</th><th>Extraction (%)</th><th>Out put (tonnes)</th><th>Extraction (%)</th></tr><tr><td>POM 7</td><td>60</td><td>377,072</td><td>84,397</td><td>22.36</td><td>14,567</td><td>3.86</td></tr></table>	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	POM 7	60	377,072	84,397	22.36	14,567	3.86
	Name of Mill				Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel										
		Out put (tonnes)	Extraction (%)	Out put (tonnes)			Extraction (%)												
POM 7	60	377,072	84,397	22.36	14,567	3.86													
<i>*Production data source from 12 months before assessment (April 2022 – March 2023)</i>																			
1.7.2	Description of Certification Scope of Supply Base																		
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (ton/year)	Yield (ton/ha/ year)	Supplied to Mill													
						FFB (ton/year)	%												
	Long Teman Estate	504.50	477.00	10,436.61	21.88	9,802.27	94.68												
	Kemitraan 9	800.00	800.00	21,894.10	27.37	15,292.27	72.19												
	Kemitraan 7	187.00	187.00	5,599.75	29.95	4,306.60	77.55												
	TOTAL	1,451.50	1,464.00	37,930.46	26.40	29,401.14	79.48												
	<i>*Production data source from 12 months before assessment (April 2022 – March 2023)</i> <i>Note: Part of the FFB from Long Teman Estate, Kemitraan 9 and Kemitraan 7 was sent to POM 1, POM 3, and POM 11 (subsidiary of PT Dharma Satya Nusantara and RSPO certified Mill).</i>																		
1.7.3	FFB description from other source																		
	<table><tr><th rowspan="2">Name of sources/Organisation (RSPO certified / non-certified)</th><th rowspan="2">Type of Organisation</th><th rowspan="2">Number of Smallholders</th><th rowspan="2">Production Area (Ha)</th><th colspan="2">Supplied to Mill</th></tr><tr><th colspan="2">FFB (tonnes/year)</th></tr></table>	Name of sources/Organisation (RSPO certified / non-certified)	Type of Organisation	Number of Smallholders	Production Area (Ha)	Supplied to Mill		FFB (tonnes/year)											
	Name of sources/Organisation (RSPO certified / non-certified)					Type of Organisation	Number of Smallholders	Production Area (Ha)	Supplied to Mill										
		FFB (tonnes/year)																	
	RSPO Certified																		
	Melenyu 4 (PT DWT)	DSN Group	-	-	10,229.79														
	Metun Sajau Estate (PT DIL)	DSN Group	-	-	24,919.36														
	Kemitraan-5 (Sawit Usaha Tani Sejahtera)	Smallholders DSN Group	-	-	1,103.20														
	Kemitraan-11 (Usaha Baru)	Smallholders DSN Group	-	-	551.61														
	Kemitraan 12 (Sawitan Surya)	Smallholders DSN Group	-	-	456.38														
	Sub Total RSPO Certified				37,260.34														
	RSPO Non Certified																		
	Sungai Wahau Estate (PT KPS)	DSN Group	-	-	16,087.84														
	Long Teman Estate (Un Certified)	DSN Group	-	-	9,827.22														
	Kemitraan-9 (Karya Bersama)	Smallholders DSN Group	-	-	25,619														
	Kemitraan 11 (Usaha Baru)	Smallholders DSN Group	-	-	4,009.47														
	Kemitraan 12 (Sawitan Surya)	Smallholders DSN Group	-	-	408.93														
	KMT-13 (Kombeng Lestari) Un Certified	Smallholders DSN Group	-	-	22,879.43														
	KMT-14 (Lay Sejahtera) Un Certified	Smallholders DSN Group	-	-	10,780.61														
	KMT-15 (Karya Sejahtera) Un Certified	Smallholders DSN Group	-	-	1,693.03														
	KMT-16 (Cahaya Miau Baru) Un Certified	Smallholders DSN Group	-	-	16,627.87														
KMT-17 (Longsep Hidup	Smallholders DSN Group	-	-	188.30															

Baru) Un Certified				
KMT-18 (Petsotsang) Un Certified	Smallholders DSN Group	-	-	567.48
KMT-19 (Piak Makmur Sejatera) Un Certified	Smallholders DSN Group	-	-	7,054.84
KMT-20 (Sam Karya Bersama) Un Certified	Smallholders DSN Group	-	-	6,668.73
KMT BULUNGAN 1 –DIL	Smallholders DSN Group	-	-	2,948.76
KMT BULUNGAN 2 –DIL	Smallholders DSN Group	-	-	848.28
KOPERASI JASA DAUN HIJAU	Third Party	-	-	3,059.55
KOPERASI SSWJ	Third Party	-	-	18,797.57
KSU SUTS (LONG BAU)	Third Party	-	-	2,992.20
KSU KEL'EAN BLOM KEJAH	Third Party	-	-	871.46
KOPERASI UTLJ	Third Party	-	-	76.97
KOPERASI KPWS NEHAS LAIH BING	Third Party	-	-	1,548.24
KSU SELEQ SEJAHTERA BERSAMA	Third Party	-	-	6,912.26
KOPERASI SERBA USAHA HARAPAN BARU	Third Party	-	-	1,047.90
KOPERASI KARYA SEJAHTERA	Third Party	-	-	3,315.75
PT RONI PUTRA ABADI	Third Party	-	-	224.14
PT TEPIAN BORNEO SEJAHTERA	Third Party	-	-	1,053.90
CV THREE PUTRA	Third Party	-	-	56,586.34
PT BERAU KARETINDO LESTARI	Third Party	-	-	4,949.83
PT WEJAS IMANUEL	Third Party	-	-	30,216.37
CV NITIROTHA PERINTIS	Third Party	-	-	5,050.93
PT SABHANTARA RAWI SENTOSA	Third Party	-	-	16,938.50
CV SETIA SAWIT TELEN	Third Party	-	-	14,424.84
CV TARUNA	Third Party	-	-	15,578.97
CV ARTA NAJWA BERSAUDARA	Third Party	-	-	35.99
PT PUTRA KAYAN MANDIRI	Third Party	-	-	698.55
Sub Total RSPO Non Certified				310,410.07
Total				347,670.41

**Production data source from 12 months before assessment (April 2022 – March 2023)*

1.7.4	Product categories	FFB, CPO, PK		
1.8	Tonnage of Product			
1.8.1	Past Annual Claim Certified Product	Last Year Projected Certified Volume (MT)	Actual (April 2022 – March 2023) (MT)	

	FFB Processed	60,764	37,435.52					
	CPO Production	13,914	8,471.117					
	Palm Kernel (PK) Production	2,424	2,017.702					
	<i>Note: * after adding o</i>							
1.8.2	Product selling							
	Type of selling product	Actual selling product for last year (April 2022 to March 2023) (MT)						
	CSPO sold as RSPO certified product	8,454.730						
	CSPK sold as RSPO certified product	1,940.678						
	CSPO sold under another scheme	0						
	CSPK sold under another scheme	0						
	CSPO sold as conventional	0						
	CSPK sold as conventional	0						
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)			
	Long Teman Estate	507.30	477.00	11,000	23.06			
	Kemitraan 9	800.00	800.00	20,000	25.00			
	Kemitraan 7*	187.00	187.00	0	0			
	TOTAL	1,307.30	1,277.00	31,000	24.28			
	<i>*Projected FFB production for 12 months of certificate</i>							
	<i>* There are subjected to sanction for next three (3) years due to New Planting after January 2010 without NPP in Kemitraan 7.</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tones/ hour)	FFB Processed (tones/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tones)	Extraction (%)	Out put (tones)	Extraction (%)	
	POM 7	60	31,000	6,975	22.50	1,395	4.50	MB
	<i>*Projected CSPO and CSPK production for 12 months of certificate</i>							
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			-				
	Others			-				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	Mill	Time Bound Plan						
	POM 1 (PT SWA)	June 2012	Jabdan 2 (PT SWA)	2012	Kutai Timur District, Kalimantan Timur Province	Certified		
			Smallholder (KM 5.9)	2015		Certified		
			Smallholder	2017		Certified		

			(KM 3,6,11,12)			
POM 2 (PT DSN)	June 2013	Puhus 1 (PT DIN)	2013	Kutai Timur District, Kalimantan Timur Province	Certified	
		Puhus 2 (PT DIN)	2013		Certified	
		Puhus 3 (PT DIN)	2013		Certified	
POM 3 (PT DSN)	August 2013	Long Kejiak 1 (PT DSN)	2013	Kutai Timur District, Kalimantan Timur Province	Certified	
		Long Kejiak 2 (PT DSN)	2013		Certified	
		Long Kejiak 3 (PT DSN)	2013		Certified	
POM 4 (PT DSN)	Nov 2014	Jabdan 1 (PT DSN)	2015	Kutai Timur District, Kalimantan Timur Province	Certified	
		Long Jenew 1 (PT SWA)			Certified	
		Long Jenew 2 (PT SWA)			Certified	
		Smallholder	2025		Waiting RaCP and SHM	
POM 5 (PT DSN)	2020	Bukit Pandunlangan 1 (PT Pilar Wanapersada)	2024	Lamandau District, Kalimantan Tengah Province	Concept Note Process	
		Bukit Pandulangan 2 (PT Pilar Wanapersada)	2024		Concept Note Process	
		Bukit Pandulangan 3 (PT Pilar Wanapersada)	2024		Concept Note Process	
		Smallholder	2025		Waiting RaCP and SHM	
POM 6 (PT DSN)	2019	Melenyu 1 (PT DWT)	2019	Kutai Timur District, Kalimantan Timur Province	Certified	
		Melenyu 2 (PT DWT)	2019		Certified	
		Melenyu 3 (PT DWT)	2019		Certified	
		Smallholder	2025		SHM Process & RaCP	
POM 7 (PT DSN)	2019	Melenyu 4 (PT DWT)	2019	Kutai Timur District, Kalimantan Timur Province	Certified	
		PT Karya Prima Agro Sejahtera	2020		NPP & RaCP Process RSPO	

			Smallholder (KM 9)	2015		Certified
	-	-	PT Dharma Intisawit Lestari	2023	Bulungan District, Kalimantan Timur Province	Stage 1
	-	-	PT Karya Prima Agro Sejahtera	2024	Kutai Timur District, Kalimantan Timur Province	HGU Process
	-	-	Smallholder	2025		SHM Process & RaCP
	-	-	PT Putra Utama Lestari	2024	Kutai Barat District, Kalimantan Timur Province	Process Concept Note
	-	-	Smallholder	2025		Process Concept Note
	-	-	PT Agro Andalan	2024	Sekadau District, Kalimantan Barat Province	Process Concept Note
	-	-	Smallholder	2025		SHM Process
	-	-	PT Kencana Alam Permai	2024	Sintang District, Kalimantan Barat Province	HGU Process
	-	-	Smallholder	2025		SHM Process
	-	-	PT Prima Sawit Andalan	2024	Sintang District, Kalimantan Barat Province	HGU Process
	-	-	Smallholder	2025		SHM Process
	-	-	PT Dharma Persada Sejahtera	2024	Sintang District, Kalimantan Barat Province	HGU Process
	-	-	Smallholder	2025		SHM Process
PKS Tepian Langsat	2021		PT Bima Palma Nugraha	2024	Bengalon District, Kalimantan Timur Province	Process Concept Note
			Smallholder	2025		SHM Process & RaCP
PKS Muara Bulan	2021		PT Bima Agri Sawit	2024	Karangan District, Kalimantan Timur Province	Process Concept Note
			Smallholder	2025		SHM Process & RaCP
	PT Dharma Satya Nusantara has committed to obtain RSPO Certificate to all management unit in accordance with TBP that has been set. MUTU has considered that PT Dharma Satya Nusantara is complied with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by PT Dharma Satya Nusantara on 29 September 2022 and signed by Head of Sustainability and has been approved by RSPO.					
1.10.2	Progress of Associated Smallholders and Out growers for Certifiable Standard					
	All smallholder under DSN group planned to be certified in 2025					

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-2	<p>1. Briyogi Shadiwa (Lead Auditor Witnessing). Indonesian citizen. Associate Degree of Oil Palm Plantation, Bogor Agricultural University. He has work experience since 2009 in several private oil palm plantation companies in Indonesia as Assistant Agronomy and Agronomy Quality Control. The trainings that have been attended include: RSPO Lead Auditor Course by Checkmark, ISPO Auditor Training by LPP, Lead Auditor ISO 9001: 2015, RSPO Supply Chain Certification Training Course by Checkmark, Lead Auditor ISO 14001: 2015, SMK3 Awareness, OHSAS 18001 Awareness: 2007, SA 8000 Awareness, ISO 45001: 2018 Awareness and General OHS Expert Training. In this audit, he verified the Legal, BMP, SCCS and Worker Welfare aspect.</p> <p>2. Rahmat Abdiansyah (Lead Auditor Witnessed). Indonesian citizen, Bachelor of Forestry from the Department of Forest Resources Conservation and Ecotourism, Bogor Agricultural University. Has experience working in the Indonesian Palm Oil Farmers Organization and Indonesian private oil palm plantation companies. Participate in ISPO and RSPO Internal Auditor training in 2018, ISPO and P&C Certification Systems IHT in 2019, IHT ISO 19011, ISPO Auditor Training in 2020, RSPO Lead Auditor Training in 2020, ISO 14001 and ISO 9001 Lead Auditor Training in 2020, and awareness of the RSPO Certification System and the RSPO P&C in 2019 and 2020. During this assessment verified Legal, FPIC, SCCS, OHS, TBP, Partial Certification and Social.</p> <p>3. Septian Maulana (Auditor). Indonesian Citizen, Bachelor of Economic, Pamulang University. Have experience as sustainability staff on oil palm plantation. Training have been followed including Occupational Health and Safety Expert Candidate certification by Ministry of Manpower and Transmigration of Indonesia; Awareness Integrated Management Systems (ISO 9001:2015, ISO 14001:2015, ISO 45001:2018); Basic Fire Fighting; Basic First Aid; Understanding the regulations and technical aspects of environmental management; Training of Immobilization after a venomous snake bite; Awareness ISO 19011:2011; Awareness ISO 17065:2012; Awareness ISO 17021:2015; ISO 14001:2015; and ISO 45001:2018; ISO 9001:2015 Lead Auditor, ISPO Lead Auditor, and RSPO Lead Auditor, Has conduct audit in aspect BMP, OHS, Worker Welfare, and Transparency since 2020. In this audit activity was verified Worker Welfare and Transparency Aspect.</p> <p>4. Firda Tarunajaya (Auditor). Indonesian citizen, Bachelor of Forestry Majoring in Silviculture, Bogor Agricultural University. He has working as an Operational Staff in an Oil Palm Plantation Company in Indonesia. Attended trainings are Lead Auditor RSPO, Lead Auditor ISPO, Quality Management Systems (ISO 9001:2015) by IRCA, Environmental Management Systems (ISO 14001:2015), ISO 19011:2018, ISO 17021:2011 and ISO 17065:2012. In this assessment, he verified the Environment, GHG and HCV aspect.</p> <p>5. Harry Wahyudi (Auditor Trainee). Indonesian citizen, Bachelor of Agricultural Technology, Department of Agricultural Engineering, Bogor Agricultural University. He has 8 years of working experience as a Field Assistant and Internal Audit Operational in a palm oil company and 3 years working experience as a Supervisor Internal Audit operational in a Industrial Forest Plantation Company. Has attended several trainings such as ISO 19011:2018, ISO 9001:2015, ISO 17021:2015, ISO 17065:2015, ISO 45001:2018, ISO 14001:2015 and OHS General Supervisor. During this audit, has verified best management practices and safety aspect under the supervision of the Lead Auditor.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-2	<p>Number of auditors: 3 auditor and 1 trainee auditor</p> <p>Number of days for ASA-1 audit: 4 days</p> <p>Number of working days for audit: 12 Working days</p>
2.2.2	Assessment Process
ASA-2	<p>The assessment was conducted by measuring the implementation of certification system and standard conducted by PT Dharma Satya Nusantara, POM 7 based on:</p> <ul style="list-style-type: none"> RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20th April 2020 RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020

The scope of certification of consist of one mill (POM 7) and three estates (Long Teman Estate, Kemitraan 9 and Kemitraan 7). For *Kemitraan 7*, it is an addition to the scope of certification. Then because Kemitraan 7 has not conducted an NPP for plants with a planting year since January 2010, the area will be subject to sanctions, which cannot trade FFB produced from the sanctioned area as Certified FFB for the first three (3) years of certification.

The audit program is included as in Appendix 2. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site. Some opportunities for improvement of the results ASA-1 by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment. Improvement of findings from Initial Certification findings were observed by auditors at this ASA-1 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-2.

The opening meeting was held on 11 April 2023. As for the participants who attended the opening meeting included Estate and Mill Managers, Support Team from Jakarta and other staffs. Closing meeting was held on 14 April 2023 attended by the same participants as the opening meeting. Management PT Dharma Satya Nusantara accept all the ASA-2 audit results.

Public Stakeholder Notification was made on MUTU 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 taken into account in the assessment.

Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix 1.

Commonly, the audit activities went well with good cooperation from the unit management. The presentation of documents is presented quite well by involving related personnel.

All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU).

The assessment program please find Appendix 2.

2.2.3	Locations of Assessment
ASA-2	<p>The sampling location consider the issue arise from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>Kemitraan 9 – Koperasi Karya Sejahtera</p> <ul style="list-style-type: none"> • Harvesting Block B60 Afdeling 3. Observation and interview related BMP, OHS, Worker Welfare and SCCS aspects. • Path Weeding Block B59 Afdeling 3. Observation and interview related BMP, OHS, and Worker Welfare aspects. • Pole No. 63, 18, 17. Observation related to company boundaries area. • Block B64 and D62. Observation related to non-certified area.

Kemitraan 7 – Koperasi Seleq Sejahtera Bersama

- **Harvesting Block C10.** Observation and interview related BMP, OHS, and Worker Welfare aspects.
- **Path Weeding Block C09.** Observation and interview related BMP, OHS, and Worker Welfare aspects.
- **Housing Complex Block C08.** Observation related housing condition and domestic waste management.
- **Rinse House Block C08.** Observation related BMP, OHS, and Environment aspects.
- **Daycare Block C08.** Observation and interview related BMP, OHS, and Worker Welfare aspects.
- **Landfill Block C09.** Observation related domestic waste management.
- **Block boundaries pole No. 6, 7 and 8.** Observation related pole condition and potential dispute.

Long Teman Estate

- **Fertilizer Storage.** Observation of fertilizer management and interview related to procedure and worker welfare.
- **Hazardous waste storage.** Observation of hazardous waste management and interview related to procedure and worker welfare.
- **Workshop.** Observations related to management and implementation of health safety, and social worker.
- **Room rinse of pesticide applicators.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Pesticide storage.** Observation about storage condition and pesticide stock and interview with worker about worker welfare, waste management, OHS implementation.
- **PPE Storage.** Observation about storage condition and stock PPE.
- **Harvesting Division 2.** Observation and interview related BMP, OHS, and Worker Welfare aspects.
- **Path Weeding.** Observation and interview related BMP, OHS, and Worker Welfare aspects.
- **Material Storage.** Observation and interview related material handling and PPE stock.
- **Clinic.** Observation dan interview related to emergency response, medical facility, work accident, waste management and medical checkup.
- **Cleaning house.** Observation about cleaning house condition.
- **HCV area, Block E35 Division 2.** Observation related to conservation management and environment aspect.
- **HGU Pole No. 1062, 1058, 009.** Observation related to company boundaries area.

POM 7

- **CPO Storage.** Observation related CPO Stock.
- **Kernel Storage.** Observation related Kernel Stock.
- **HGB Pole No. 29, 30, 31.** Observations related to the condition of the HGB stakes and the suitability of the location.
- **EBA.** Observation of EFB area management and run off.
- **WWTP and outlet POME disposal point.** Field observations about WWTP, run off, testing of effluent and potential contaminant.
- **Housing complex and Facilities.** Observation and interview regarding facilities and infrastructure.
- **Domestic Wastewater.** Observation on domestic waste management.
- **Reservoir.** Observation for water usage monitoring.
- **Wighbridge.** Observation and interview related SCCS procedure.
- **Hydrant Simulation.** Observation related emergency equipment condition.
- **Security Post.** Observation and interview related SCCS, Worker Welfare, and OHS aspects.
- **Processing Station (Boiler, Engine Room, Kernel, Grading, Loading Ramp).** Observation and interview related worker welfare, BMP, OHS and environment aspects.
- **Hazardous Waste Storage.** Observation and interview related worker welfare, BMP, OHS and environment aspects.
- **Workshop.** Observation and interview related worker welfare, BMP, OHS and environment aspects.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.

ASA-2	<p>Summary of stakeholder consultation process for PT DSN POM 7 and PT Karya Prima Agro Sejahtera was held by:</p> <ul style="list-style-type: none"> • Public Notification on website on MUTU Website on 6 June 2022 • Public consultation with NGOs (by email) such as WALHI, AMAN, and Sawit Watch on 31 March 2023. • Public consultation meeting with government institution on 11 April 2023. • Public consultation meeting with communities on 11 April 2023. • Public consultation meeting with internal stakeholders on 11 to 12 April 2023. <p>Numbers of input from stakeholders were clarified by PT DSN POM 7</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit (Surveillance-3) will be conducted eight (9) months to twelve (12) months after Mei 2024

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Palm Oil Mill 7 (POM-7) – PT Dharma Satya Nusantara operation consisting of one (1) mill and three (3) oil palm estates.

During the assessment, there were *Two (2)* nonconformities were assigned against Major Compliance Indicators; Three (3) nonconformance were assigned against Minor Compliance Indicators and *one (1)* opportunity 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 actions that had been reviewed and accepted by Auditors in form of documentation evidences e.g. (*document record/photographic/etc.*). Those corrective actions taken that consist of *Two (2)* Major non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that *POM 7 – PT Dharma Satya Nusantara Tbk* complied with the requirements of **RSPO Certifications Systems for Principles & Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020) and Indonesia National Interpretation RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSPO Board of Governors on 20th April 2020**

Therefore, MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is *Continued*

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1	The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1	Unit of certification showed SOP of communication and handling external grievance (SOP-AGR-044-R02) validated on 14 October 2019 which explains the types of documents which are publicly accessible such as vision and mission, company policies, <i>AMDAL</i> (Environmental Documents), <i>HGU</i> (land permits), company regulations, plantation maps, etc. These documents is available in Indonesian and can be accessed by sending information request to the management.	
	Based on the interview with both internal and external stakeholders, it's known that stakeholders aware of the type of information available also the information and communication access of the UoC provided easily accessible via phone, email, fax, and mobile application.	
1.1.2	Based on communication and consultation procedures No. SOP-AGR-044-R02 dated 14 October 2019, documents that can be accessed by the public include:	
	<ul style="list-style-type: none"> • Vision and mission of the company • Company policy • EIA documents • Location permission 	

- HGU permit
- Plantation Business Permit
- Building permit
- Permits related to Mill operations: boiler licenses, generator licenses, sterilizer permits.
- Medical Center license and paramedic license
- Hazardous waste storage permit
- Farm Map
- Specific regulations for plantations/PKS: boiler licenses, generator licenses, sterilizer permits.
- Plantation operational organizational structure/PKS
- Company regulations
- Quarterly company reports
- Report on CSR empowerment activities
- Social conflict resolution reports
- ISO/RSPO, HCVA, SIA audit results and their follow-up
- OSH Program.

Interviews with the CSR Operation Department found that the response to requests for information was 4 days. This is in accordance with the Communication and Consultation Procedure document number SOP-AGR-044-R01. The PIC for communication and consultation is staff cooperating social responsibilities.

The company shows evidence of providing information to agencies in the form of routine reports, for example:

- *UKL UPL* (Environment Monitoring and Management) Report of PT. DSN – POM 7, Semester 1st of 2022 on 10 April 2023 through the SIMPEL application with ID TTE 1681085625-7198.
- *UKL UPL* (Environment Monitoring and Management) Report of PT. DSN – POM 7, 2nd Semester of 2022 on 31 January 2023 via the SIMPEL application with ID TTE 1675120685-7198.
- *DPLH* (Environment Documents) KM9 PT. KPS Report 2nd Semester of 2022 on January 26, 2023 to the Head of Environment Agency Kalimantan Timur Province.
- *UKL UPL* KPS, 2nd Semester of 2022 Report on 26 January 2023 to the Head of Environment Agency Kalimantan Timur Province.
- Hazardous Waste Management Report PT. KPS 4th Quarter of 2022 on 26 January 2023 to the Head of Environment Service Kalimantan Timur Province.
- Toxic and Hazardous Waste Management Report POM 7, 4th Quarter 2022 on 26 January 2023 to Head of Environment Agency Kalimantan Timur Province.
- Report on Environmental Monitoring 4th Quarter of 2022 on 26 January 2023 to the Head of Environment Agency of Kalimantan Timur Province.
- Report on the Management of POME Waste and POM 7 Waste, in the 4th Quarter of 2022 on January 26th, 2023 to the Head of Environment Agency of Kalimantan Timur Province.
- Report *UKL UPL* (Environment Monitoring and Management) POM 7, 2nd Semester of 2022 on January 26, 2023 to the Head of Environment Agency Kalimantan Timur Province.
- The 2022 HGU Use and Utilization Report was sent on January 10, 2023 to the BPN of Kutai Timur Regency.
- A progress report on plantation activities for Quarter 1 of 2023 was reported on April 6, 2023 to the Plantation Office of Kutai Timur Regency.
- 4rd Quarter OHS committee Report (POM7) dated 17 January 2023 to the Office of Manpower and Transmigration of Kutai Timur Regency.
- 4rd Quarter OHS committee Report (LTE) dated 19 January 2023 to the Office of Manpower and Transmigration of Kutai Timur Regency.
- Compulsory online employment report PT Dewata Sawit Nusantara No. 75655.20230130.0004 dated January 30, 2023 with the obligation to report back on January 30, 2024.
- Mandatory online employment report PT Karya Prima Agro Sejahtera No. 75655.20230130.0005 dated January 30, 2023 with the obligation to report back on January 30, 2024.
- Mandatory online employment report PT Dharma Satya Nusantara No. 75655.20230130.0003 dated January 30, 2023 with the obligation to report back on January 30, 2024.

1.1.3

The company has a Communication and Consultation Procedure document number 0215B/SWA-CSR-WHU/VI/2012. The SOP explains that any information from stakeholders is responded to by the company with a response period of 3 days. Records of requests for information are recorded in a book of incoming and outgoing letters along with their responses.

Records of requests for information and responses have been recorded in the Recap of Complaints related to non-Employment for requests for information and internal complaints and an external complaint book to accommodate requests for information and external complaints. For example:

- Submission of information from the people of Muara Wahau regarding road access improvements which were responded to on the same day and realized in the following 6 days.
- Proposal from Sri Pantun Gita Angga Village No. 0001/P-HUT/SP-KB/I/2023 regarding the notification and request for funds received on January 30, 2023 and has been responded to by the company through letter No. 0001/KPS-ESG-WHU/II/2023 dated 1 February 2023.
- Proposal from the Chairman of the Committee for the Inauguration of the Management of the Dayak Traditional I of Makmur Jaya Village No. 01/PPPLAD/MJ/III/2023 regarding requests for financial assistance received on March 10, 2023 and have been responded to by the company through letter No. 0005/KPS-ESG-WHU/III/2023 dated 13 March 2023.

1.1.4

Based on the results of interviews with representatives of surrounding villages and government agencies in Kutai Timur Regency, information was obtained that the stakeholders had an understanding of the company's consultation and communication mechanisms.

1.1.5

The Company showed the current list of stakeholders which informed the internal and external stakeholders updated on 31 March 2023. The stakeholders include the government agencies, heads of the community, cooperatives, local suppliers, contractors, community organizations, labor union organizations, non-governmental organizations, communities around operational areas, media, etc. In the current list of stakeholders, it was also explained the names, agencies/positions, addresses, categories and contact person numbers.

During the assessment, auditor has verified the list of stakeholders by calling the contact person randomly to ensure the validity of its contact person put in the list of stakeholders.

Status: Comply

1.2

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

1.2.1

The company has a code of integrity and ethical behavior in all operations and transactions. This commitment is stated in the DSN Group Quality Guidelines document (No. PDM-AGR-R05, 01 January 2020) approved by the Executive Director of SBU Agro I. In clause 7.5 of the Quality Guidelines, it is stated that every employee is committed to ethical behavior in all transactions and business operations by ensure that:

- Each activity must reflect compliance with reasonable business practices.
- Prohibit any employee from corruption, bribery and fraud in using funds and resources.
- Provide information in accordance with applicable laws and palm oil industry practices.

Companies can show recordings of periodic outreach related to the Code of Ethics to employees, for example on January 4, 2023 at Mill 7 which was attended by 30 participants.

In addition, based on the results of interviews with stakeholders (representatives of PT Berau Karetindo Lestari, Nehes Liah Bing Village and Miao Baru Village), information was obtained that stakeholders had understood the company's Code of Ethics.

1.2.2

The company also shows several SOPs related to monitoring compliance and implementing ethical business practices, as follows:

- Recruitment SOP (No. SOP-AGR-012-R03) which was ratified on 01 December 2019 stating that there are no fees in the recruitment process. The company has guaranteed recruitment fees if there are migrant workers.
- SOP for handling employee complaints (No. SOP-AGR-054-R03) which was passed on October 30, 2020 which states that the company guarantees freedom of expression by maintaining the confidentiality of employee identities.
- Management System Audit SOP (No. SOP-AGR-040-R03) which was ratified on October 1, 2015 which aims to ensure that the quality management system, SMK3 and the Environment are running effectively, regulatory and statutory requirements as well as certification requirements followed by the company are met.

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 company has complied with several legal compliances in the environmental field, for example:

- Letter of Technical Approval for Utilization of Wastewater for Land Application No. 660/1940/5-DLH/XII/2021 December 20, 2021 from Environment Agency Kutai Timur District.
- Extension of permit for temporary storage of hazardous and toxic waste materials. The company can show the Decree of the Kutai Timur Regent Number: 503/09/DPMPTSP-PPNP/TPS-LB3/IV/2021 regarding the extension of the permit for the temporary storage of hazardous and toxic waste materials for PT KPAS in Kongbeng District, Kutai Timur Regency on April 26, 2021 by validity period of 5 years.
- Decree of the Kutai Timur Regent regarding Environmental Permit number 660.5/K.188/2015 on 19 March 2015 with an area of $\pm 2,563$ Hectare, on Miau Baru Village, Kombeng Sub District, Kutai Timur District, Kalimantan Timur Province.
- Environment License from Indonesia Government with number 8120002900875 on 19 March 2015 with an area of 6,109 Hectare, on Miau Baru Village, Kombeng Sub District and Kutai Timur District, Kalimantan Timur Province.
- *Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu* District of Kutai Timur Decree Number 503/09/DPMPTSP-PPNP/REK.UKL-UPL/V/2019 dated 14 May 2019 about Recommendation of Environment Managment and Monitoring Plan (UKL-UPL) for Palm Oil Mill 7 with capacity 60 MT/hours on the area ± 40 Hectare PT Dharma Satya Nusantara, Tbk (PT DSN) on Miau Baru Village, Kombeng Sub District and Kutai Timur District, Kalimantan Timur Province.
- *Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu* District of Kutai Timur Decree Number 503/10/DPMPTSP-PPNP/LA/IV/2020 dated 15 April 2020 about Extention of Land Application License from POM 7 PT DSN to the land of PT Karya Prima Agro Sejahtera (PT KPAS) on Kongbeng Sub District, Kutai Timur District. Validity period for 5 years with area 3344.67 Ha, Block L48, L49, L50, L50A, L51A, L51B, L52B, L52C, M47, M48, M50A, M51A, M52, M52A, M52B, M53, M54, M55, N33, N34A, N40A, N40, N42A, N44A, N44B, N44C, N45, N46, N47, and M49A with volume of effluent: 157,500 m³/years.
- Technical Approval for Utilization of Wastewater for Application to Soil from the Kutai Timur District Environmental Agency, number 660/1940/5-DLH/XII/2021, December 20th, 2021, with 30 points and locations for wastewater utilization.
- *Pekerjaan Umum dan Perumahan Rakyat* Minister Decree number 767/KPTS/M/2017 dated 2 October 2017 about surface water utilization for PT DSN in Wahau River. Water utilization with volume: 45,036 m³/month; the water intake coordinate is 01°16'53.58" N and 116°54'28.8" E. validity period of this license is 5 years.
- Environmental Management Document (*DPLH*) for Oil Palm Plantation Activities Cooperative Karya Sejahtera in Partnership with PT KPAS Covering an area of 2,100 Ha, located in Miau Baru Village, Kongbeng District, Kutai Timur Regency, Kalimantan Timur Province, 2011. Ratified by the Head of the Kutai Timur Regency Environment Agency, September 22, 2011, number 660/1204/3-BLH/IX/2011.

Legal

- Has a Land Title of 504.50 Ha for Long Teman Estate (PT KPAS) as HGU certificate No. 311 for an area of 300.93 Ha,

certificate No. 312 for an area of 143.46 Ha, HGU certificate No. 313 for an area of 57.75 Ha, and certificate No. 314 for an area of 2.36 Ha issued on 09 December 2019 is valid until 17 October 2054.

- Already have HGB for 2.8 Ha according to certificate No.61 for an area of 0.8 Ha and certificate No.60 for an area of 2 Ha which was issued on 15 October 2019 valid until 09 October 2039.
- Already have SHM of 800 Ha for 400 farmers in Partnership 9, for example indicated by Land Certificate No.159 and certificate number 16.09.08.07.1.00159 with an area of 2 Ha.
- Decree of the Head of the Kutai Timur District Land Office Number 42/2018 dated 14 August 2018 concerning the Granting of Property Rights in the name of Simson Lawai, DKK for 149 plots covering an area of 171.0522 Ha. (KM7)
- Decree of the Head of the Kutai Timur Regency Land Office Number 77/2018 dated October 5, 2018 concerning the Granting of Property Rights in the name of Saut P. Napitupulu as many as 17 Fields covering an area of 15.9513 Ha. (KM7)
- Plantation Business Permit (POM 7), Approval of the Kutai Timur Regent, Number: 525/136/EKO.1-VII/2015, dated 27 July 2016 concerning Adding the Capacity of the Plantation Products Processing Industry of PT Dharma Satya Nusantara from the original 60 Tons of FFB/Hour located in Muara Wahau District and 60 Tons of FFB/Hour in Kongbeng District to 120 Tons of FFB/Hour for Palm Oil Commodities located in Kongbeng District and Muara Wahau District, Kutai Timur Regency, Kalimantan Timur Province.
- Palm Oil plantation business permit for PT Karya Prima Agro Sejahtera for a land area of \pm 5,000 ha located in Miau Baru Village, Kongbeng District, Kutai Timur Regency, Kalimantan Timur Province according to the Decree of the Kutai Timur Regent dated 9 February 2009 number 500/136 /EKO.2/II/2009.
- Certificate No 525/07/PUP Disbun/VI/2022 for PKS 7 in the Plantation Class II category (good) dated 27 June 2022 issued by the Regent of Kutai Timur.
- Certificate No 525/05/PUP Disbun/VI/2022 for PT Karya Prima Agro Sejahtera in the Plantation Class II category (good) dated 27 June 2022 issued by the Regent of Kutai Timur.

BMP

Compliance with certification units in the use of pesticides that have been registered with the Pesticide Commission, such as Kleenup (RI Registration Number 0103011989819 which is valid until 03 September 2023) and Metaprima (RI Registration Number 01030120031897 which is valid until 03 September 2023).

OHS

- The company has established a P2K3 structure for plantations and factories that have been registered with the relevant agencies. OHS experts in plantations and factories also have certificates and SK OHS Expert from the Minister of Manpower. Appointment of OHS Expert PT. KPAS with SK number 500.15.18.5/528/P2K3/PPK/DTKT/II/2023 which is valid until February 2, 2026. Application for submission of OHS Expert training PT. DSN with number 195/EXT-DPJ/VII/2022 on 14 July 2022.
- The company has established a P2K3 structure for plantations and factories that have been registered with the relevant agencies. OHS experts in plantations and factories also have certificates and SK OHS Expert from the Minister of Manpower. Appointment of OHS Expert POM 7 with SK number 500.15.18.5/530/P2K3/PPK/DTKT/II/2023 which is valid until February 2, 2026. Application for submission of OHS Expert training PT. DSN with number 195/EXT-DPJ/VII/2022 on 14 July 2022.

Worker Welfare Aspect:

- The company has implemented a minimum wage and the fulfillment of overtime wages.
- The company already has and implements the pay scale structure.
- There was no illegal labor, underage labor and forced labor systems.
- All workers were permanent workers.
- Mandatory report of manpower has been reported according to its period.

2.1.2

The mechanism to ensure the updating of any changes to legal regulations is stated in the SOP document for legal identification and other legal requirements, document no. SOP-AGR-024-R01 issued September 8, 2014. In this procedure, it is explained that updating of regulations is carried out every 6 months through several methods including:

- Identify/request information directly to regulatory issuing agencies.
- Identify through the official website of the regulatory issuing agency and/or the official website for updating laws and

regulations.

- Through socialization conducted by regulatory issuing agencies and/or other private agencies.

The unit of certification has a list of legal regulations contained in the Summary and Review of Conformity with Regulations and Legislations and Other Requirements for December 2022. The regulations cover aspects of agribusiness, employment, environment, and other regulations related to the company operational activities i.e:

- PP No. 35 of 2021 concerning Specific Time Work Agreements, outsourcing, working hours, rest periods, and layoffs
- PP No 36 of 2021 concerning Wages
- PP No 37 of 2021 concerning Job Loss Guarantee
- PermenLHK Number P.12 of 2020 concerning Storage of Hazardous and Toxic Waste
- Regulation of the Minister of Manpower number 4 of 2022 concerning payment procedures and terms for "*Jaminan Hari Tua*".

Evaluation of law registers for contractors is explained in more detail in 2.2.2

2.1.3

Procedures for monitoring and maintaining legal boundary poles are set out in document No. IK-AGR-OLP-33-R01 dated 1 February 2019. The procedure states that maintenance is carried out by officers appointed by the Head of Plantation. HGU boundary monitoring is carried out every 6 months. The mechanism for ensuring the updating of any changes to legal regulations is contained in the SOP document for legal identification and other legal requirements, document no. SOP-AGR-024-R01 was issued September 8, 2014. The procedure explains that regulations are updated every 6 months. Based on field monitoring to pole No. 018 and 017 KM9 and HGU poles KPAS1062, KPAS 1058, and KPAS 009 it is known that the HGU poles are in good condition according to what is written in the monitoring results.

Status: Comply

2.2

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

2.2.1

In monitoring the existence of contractors for plantation and mill activities, UoC 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. The contractors collaborate in the activities of operational vehicles rental such as CPO and FFB transport, kernel transport, operational transport, etc, here as follows:

- DSN POM 7: 20 External FFB Suppliers and 26 Contractor (CPO Transport, Vehicles Rent).
- Kemitraan 9 Estate: 4 Contractor (3 vehicles rent, 1 FFB Transport).
- Kemitraan 7 Estate: 1 FFB Transport.

2.2.2

Companies can show that contracts including those with FFB suppliers have separate clauses regarding the fulfillment of relevant legal obligations, for example those contained in the Purchase Order document No. 1044002924 dated PO 7 – 15 November 2022 to PT Berau Karetindo Lestari as:

- The second party must include its workforce in the BPJS Employment and BPJS Health programs.
- The second party complies with the laws and regulations in force in Indonesia, especially those governing employment, occupational safety and health and the environment (*K3L*), road traffic and transportation, as well as the first party's sustainability policy, including but not limited to:
 - Provision of wages in accordance with the City/District Minimum Wage (UMK) for its workforce.
 - Do not employ child labor under the age of 18.
 - Do not practice forced labor.
 - Do not employ workers from the results of human trafficking.
- The second party provides the necessary PPE and requires and guarantees that its workforce uses the PPE during work implementation with the following conditions: Helmets, Safety Shoes, Masks and Gloves.

The company can show proof of compliance with regulations made by vehicle rental contractors (Maria Fitri Agus, Kajad, Edi

Rusman and Sunarsih) such as contractor performance evaluations, salary slips and proof of BPJS membership for contractor employees. However, the company has not been able to show documentation of the implementation of relevant legal obligations by PT Berau Karetindo Lestari and PT Tepian Borneo Sejahtera.

Based on the explanation above, it is concluded that the company has not been able to show evidence that the fulfillment of relevant legal obligations can be proven by the third party concerned, so this is a non-compliance. **NCR No.2023.01**

2.2.3

Separate clauses prohibiting practices involving child labour, forced labour, and workers from human trafficking are included in every work agreement document with FFB contractors or suppliers. For example, in the FFB Purchase Order document No. 1044000112 period 1 – 30 April 2023 to PT Wejas Imanuel stating among others:

- Do not employ child labor under the age of 18
- Do not practice forced labor
- Do not employ workers from the results of human trafficking.

2.2.2	Status: NCR No. 2023.01 With Minor Category
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2.3

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

2.3.1 & 2.3.2

Based on the recap of FFB POM7 receipts for the 2022 and 2023 periods, it is known that factories process FFB from both direct and indirect suppliers with the following details:

Direct FFB suppliers:

- Long Teman Estate (PT Karya Prima Agro Sejahtera) → Certified RSPO
- Long Teman Estate (PT Karya Prima Agro Sejahtera) → Non-Certified RSPO
- Sungai Wahau Estate (PT Karya Prima Agro Sejahtera) → Non-Certified RSPO
- ME 4 (PT DWT) → Certified RSPO
- MSE (PT DIL) → Non-Certified RSPO
- Kemitraan 5 → Non-Certified RSPO
- Kemitraan 7 → Non-Certified RSPO
- Kemitraan 9 → Certified RSPO
- Kemitraan 9 → Non-Certified RSPO
- Kemitraan 11 → Certified RSPO
- Kemitraan 11 → Non-Certified RSPO
- Kemitraan 12 → Certified RSPO
- Kemitraan 12 → Non-Certified RSPO
- Kemitraan 13 → Non-Certified RSPO
- Kemitraan 14 → Non-Certified RSPO
- Kemitraan 15 → Non-Certified RSPO
- Kemitraan 16 → Non-Certified RSPO
- Kemitraan 17 → Non-Certified RSPO
- Kemitraan 18 → Non-Certified RSPO
- Kemitraan 19 → Non-Certified RSPO
- Kemitraan 20 → Non-Certified RSPO
- Kemitraan Bulungan 1 (PT DIL) → Non-Certified RSPO
- Lemitraan Bulungan 2 (PT DIL) → Non-Certified RSPO
- Koperasi Jasa Daun Hijau → Non-Certified RSPO
- Koperasi Semoga Sawit Wahau Jaya → Non-Certified RSPO
- Koperasi Usaha Tani Sejahtera (Long Bau) → Non-Certified RSPO
- KSU Kel'Ean Blom Kejah (Nehas Liah Bing) → Non-Certified RSPO
- Koperasi Usaha Tani Sejahtera (Long Bau) → Non-Certified RSPO
- Koperasi Karya Prima Wehea Sejahtera → Non-Certified RSPO

- KSU Seleg Sejahtera Bersama (Miau Baru) → Non-Certified RSPO
- KSU Harapan Baru (Muara Wahau) → Non-Certified RSPO
- Koperasi Karya Sejahtera → Non-Certified RSPO

Note: all suppliers are a group of PT Dharma Satya Nusantara.

Indirect FFB suppliers

- PT Roni Putra Abadi
- CV Three Putra
- PT Berau Karetindo Lestari
- PT Wejas Immanuel
- PT Tepian Borneo Sejahtera
- CV Nitirotha Perintis
- Koperasi Jasa Daun Hijau (Miau Baru).

Identity has been shown for direct or indirect FFB suppliers, for example direct FFB suppliers for the Prosperous Farming Oil Palm Cooperative with a total of 139 members and an area of 389.20 Ha located in Long Bau Hamlet, Nehes Liah Bing Village, Muara Wahau District. As for indirect FFB suppliers, for example CV Three Putra already has a list of supplying farmers with a total of 49 points of land. The information listed includes the following:

1. Smallholder: Miraldus Nainggolan 1
Village: Tepian Baru
coordinate: 0°46.75.20'N; 117°14.9720'E; Tahun tanam 2009
2. Nama petani : Bapak Anton (Ex Bapak Mamin)
Desa : Tepian Langsat SP2
Koordinat : 0°42.2810'N; 117°17.1710'E

Based on document verification, it is known that the Company has completed the requirements according to request 2.3.1 for indirect FFB suppliers.

Status: Comply

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

3.1

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

3.1.1

Certification Unit has shown Projections, Work Plans and Budgets for 2022 – 2026. The parameters listed in the management plan include income and income, projected crop production (FFB yield trends), CPO and PK extraction rates (Estimated production up to 2026), harvest, FFB and CPO processing. The information in the document consists of the Plantation's operational activities and budget plans (land clearing, planting, maintenance and harvesting), as well as POM 7 (FFB) operations. Process, OER, KER, CPO & PK Produced and FFA), sales projections, CSR programs, and environmental programs. For example, projections for 2024, processed FFB 306,000 tons, CPO 72,376 tons, kernels 4.50%, FFA 2.6%, plantation budget 72.445 billion, POM 7 budget 678.499 billion, projected revenue 944,459 billion, net balance 161.563 billion. The company shown the system/MOM to improve practices in line with new information and techniques through continuous improvement. All staff can propose continuous improvement. Continuous improvement is communicated to all unit management. Minutes of Meeting (MoM) Performance Review Q4 2022.

3.1.2

The replanting plan will be evaluated for implementation in a Business Progress Report which is prepared annually. The rejuvenation program was evaluated based on SOP No. AA-APM-OP-1100.20-R8 by considering crop production, company finances, plant height and plant population. Based on field observations and interviews, it is known that autumn has never happened. Conducted. The management representative explained that the yield/ha is still high at an average of 26.8 tons/ha in 2020 and 24.5 tons/ha in 2021. This has become management's consideration for delaying replanting.

3.1.3

Certificate Unit explained the evaluation related to the Business Plan has been carried out every 3 months. He showed the Minutes of the Q4 Performance Review Meeting which was held on 26-27 January 2023 through a virtual Googlemeet, which was attended by the Regional Head, Plantation Head, Plantation Head, Factory Head, Replanting Team, Engineering, Sustainability, Project, and CSR. The document discusses problems in each PT/unit, PIC, related parties, follow-up, and types of discussion. Some of the issues discussed included company costs, factory performance, losses, increasing FFB quality and quantity, peak season, project costs, and replanting.

Status: Comply

3.2

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

3.2.1

The company regularly monitors continuous improvement, covering economic / best practice, social and environmental aspects for each unit (Factory and Plantation), including:

- The company has conducted an internal RSPO audit consisting of 3 time, namely 8-10 August 2022 at *Kemitraan 9* Estate, 11-13 August 2022 at LTE and 17-18 October 2023 at Km 7 Estate with a total of 6 non-conformities and these non-conformities has been repaired in its entirety on November 30th, 2022.
- The company has carried out environmental management and monitoring and reported its operational activities regularly.
- The company has made efforts to apply the latest technology in environmental aspects, including:
 - Using shells, fiber and EFB to substitute boiler fuel
 - Using organic fertilizers, land applications and EFB to reduce chemical fertilizers.
- Unit of certification committed no longer uses pesticides with the active ingredient paraquat, with a memorandum on the prohibition of the use of paraquat number 001/S&I/I/2020 since January 14, 2020.
- Unit of certification committed has implemented biological pest control in this case by using host plants and owls to reduce the use of pesticides, especially insecticides and rodenticides, by showing owl monitoring maps in almost all LTE and KM 9 plantation blocks.
- Unit of certification committed to monitoring of fires in the company's border areas that are beneficial to the community.

3.2.2

The company already has an annual report document using the RSPO version 2.1 metric template format, which is provided to the auditor team during the assessment. The metric template data that is filled in is the reporting period from January to December 2022, for example:

- RSPO Member Name: PT Dharma Satya Nusantara
- RSPO Membership Number: 1-0135-12-000-00
- Certified Audit Name: PT Dharma Satya Nusantara (POM 7)
- Name of Certification Body: PT Mutu Agung Lestari
- RSPO Palm Oil Footprint ID Number: RSPO_PO100001024
- Supply Chain Model: Identity Preserved (IP) (MB)
- Number of Factories: 1
- Number of Certified Plantations: 3
- Total Certified Production Area: 1,462 Ha
- Total Certified Area: 1,492 Ha
- HCV Area: 2.20 Ha.
- Production of Certified CPO: 9,538 tons
- Production of Non Certified CPO: 73,862 tons
- CPO Sales – RSPO: 3,560.65 tons
- Total Hours Worked Partnership 9 & LTE: 38,800 Hours
- Water use: 0 m3

The company also shows the existing supporting data such as the Mass Balance data, it is known that the data for Certified

CPO Production is 9,556.43 Tons, Non-Certified CPO Production is 73,843.73 Tons, CPO Sales – RSPO is 9,589.54 Tons. In addition, in the OHS data, there are 38,800 Total Hours Worked in *Kemitraan 9* & LTE. The company also shows evidence of water use data for process activities in the factory as much as 328,050 m³. Based on the supporting data, the value does not match the data that has been included in the annual report in the metric template format for the period January to December 2022.

Based on the description above, the Company has not been able to provide evidence that the annual report using the RSPO Metric Template is in accordance with actual conditions. **NC 2023.02 with Minor Category**

**Minor
3.2.2**

Status: Not Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

From the list of SOPs provided by the company and employee interviews, there were no changes to the SOPs. All these management procedures are available in each office and documented in Indonesian. The procedure has been periodically disseminated to all employees of the plantation and mill through routine training and morning briefings. Interviews with employees showed a satisfactory level of understanding and implementation in relation to their respective job functions.

Representatives of the certification holder have demonstrated that the operating procedures, set out in the Work Instructions (WI), are well documented, consistently implemented and monitored. The Work Instruction has covered all operations of the Plantation, starting from land clearing, maintenance, pest management, harvesting, FFB transportation, replanting, delivery to the POM. Meanwhile, the Factory Work Instructions cover aspects of FFB acceptance, grading, processing, purification, delivery, supply chain, and quality/laboratory. Each Work Instruction includes OHS and environmental aspects. However, there are also special documents that regulate OHS and the environment in the Safety and Environmental Management Work Instructions, as well as Hazard Identification Risk Assessment and Control (HIRAC).

Based on field observations, samples of plantation operations were taken during the harvesting process at Block C10 KM7 and spraying pesticides at Block C09 LTE. The operation of the POM 7 mill is carried out starting from the loading ramp to the delivery of CPO including the supporting processes, eg. Grading, boiler and Kernel. It can be seen that all activities have been carried out according to procedures.

3.3.2

The company has a system that ensures consistency in the implementation of its SOP such as a check or inspection of the quality of work (operational audit of plantations and mills), ISPO and RSPO internal audits that check whether procedures in the company have been implemented by the company unit and financial audits carried out by external parties to ensure the usage or fees used are in accordance with the rules set by the company. Daily internal supervision is carried out by the supervisory level starting from the Foreman, Division Assistant, Assistant Head, to the Plantation Manager. Operational audits are conducted once a month. Operational audits evaluate the operational and administrative performance of plantations and mills. Meanwhile, the RSPO internal audit is conducted every 6 months to evaluate the implementation of sustainability procedures in plantations and mills. Public accountant financial audit is conducted once a year. Furthermore, management representatives (related Assistants, Managers and Bosses) regularly make inspectorate visits to control the implementation of procedures.

In addition, to monitor the suitability of the contractor's work against the stipulated procedures, the company conducts an inspection on each payment request.

3.3.3

The company shows the documents of the results of the internal audit for the plantation (Mill and LTE) unit which was carried out on February 124-25 February 2023 by the internal auditor. Based on the audit results, it is known that there are several findings where these findings have been followed up and declared fulfilled by the internal auditor. The unit certification has also conducted evaluation of contractor performance to compliance with CH procedure before the payment. The contract payment will be conducted after *Berita Acara Pemeriksaan Pekerjaan*.

Based on field observations and interviews with harvesting supervisors show that they also record all operational activities in

the Supervisor Daily Report and submit these reports every day. Daily reports describe the type of work, number of workers, use of materials, and individual employee achievements. Furthermore, all company operational activities are recorded in the form of Monthly Reports for oil palm plantations and mills. The operational activity report is a recap of daily activities. The evaluation mechanism for all operational activities, both plantations and mills, is carried out by managers.

Status: Comply

3.4

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

3.4.1

The unit of certification already has several social and environmental impact assessment documents that are carried out independently or participatively. This study was carried out by accredited independent experts and in the process involved affected stakeholders. Some of the documents owned by the unit of certification are as follows:

Environmental Impact Assessment (EIA)

Certification unit 7 Factory PT. KPAS and PT. Dewata Sawit Nusantara is under the company PT. DSNG, the company already has documents on the results of an Environmental Impact Assessment (EIA) which cover all areas included in the scope of certification and can be proven based on the following documents:

- Environmental study in the form of an EIA document for 2008 for PT KPAS's Oil Palm Plantation with an area of $\pm 5,000$ Ha and a processing plant with a capacity of 30 tons of FFB/hours. This document is in accordance with the Decree of the Kutai Timur Regent Number: 188.4.45/514/HK/2008 on October 17, 2008 concerning Issuance of a Location Permit for the purpose of developing a PT KPAS oil palm plantation covering an area of $\pm 5,000$ Ha located in Miao Baru Village, Kongbeng District, Kutai Timur Regency with the development of plantations and palm oil mills with a capacity of 30 tons of FFB/hours.
- Environmental study in the form of *UKL/UPL* for the construction of a palm oil mill, namely PKS 7 with a capacity of 60 tons of FFB/hours in Miao Baru Village, Kongbeng Sub District, Kutai Timur Regency. This environmental document has been approved *Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu* of Kutai Timur Regency on May 14 2019 with Number 503/09/DPMPTSP-PPNP/REK.UKL-UPL/V/2019.
- Environmental study in the form of an Environmental Management Document (*DPLH*) for Oil Palm Plantation Activities of Karya Sejahtera Cooperative Partnering with PT KPAS (*Kemitraan 9*) Covering an area of 2,100 Ha, located in Miao Baru Village, Kongbeng District, Kutai Timur Regency, Kalimantan Timur Province, 2011, Ratified by the Head of the Kutai Timur Regency Environment Agency, September 22, 2011, number 660/1204/3-BLH/IX/2011.
- Environmental study in 2011 in the form of an Environmental Management Document (*DPLH*) for Oil Palm Plantation Activities of the Seleg Sejahtera Bersama Cooperative (*Kemitraan 7*) covering an area of 318 Ha in Miao Baru Village, Kec. Kongbeng Kab. Kutai Timur. The document is in accordance with the SK BLH Kab. Kutai Timur No. 660/1057/3-BLH/VIII/2011 Dated 19 August 2011.

In the document above, there is information related to environmental aspects and parameters that must be monitored and managed along with information on targets and time for implementation contained in the *UKL-UPL* matrix and the *DPLH* matrix. The document also covers all aspects of plantation and factory activities as well as changes related to company operations. The sampling methodology used is also participatory involving groups of external stakeholders for the purpose of identifying impacts. Based on the verification of these documents, it can be concluded that all environmental impacts from plantation activities have been identified and management recommended with reference to relevant laws and regulations.

Social Impact Assessment (SIA)

The Social Impact Assessment Report was prepared in June 2013, the assessment was carried out in a participatory manner involving internal and external stakeholders on 22-24 May 2013. The study area for Miao Baru Village and Nehas Lias Bing with a focus on social impacts is as follows: Relocation of residents and land acquisition, access to resources, accident and health risks, public perception, employment, marginalization of minor groups, social conflict, increased income, increased capacity of human resources, organizational strengthening, changes in environmental habits.

The document has explained the social impacts that must be monitored and managed, consisting of: Land Clearing and Acquisition, Accident and Health Risks, Community Perceptions, Public Health, Employment, Marginalization of Minor Groups,

Social Conflict, Increased Income, Increased HR Capacity, Strengthening Organizations, Changing Habits and Environment, and Development of Plasma.

The unit of certification shows documentation of meetings with stakeholders consisting of community representatives, formal figures (village heads) and informal figures (community leaders and customary heads). The documentation includes: List of attendees of the social impact discussion on 22 May 2013 attended by 18 people from Miau Baru Village, 23 May 2013 attended by 22 people from Long Sep Hamlet, Miau Baru Village, 23 May 2013 attended by 17 residents from Nehes Liah Bing Village, 22 May 2013 was attended by 9 residents of Long Ba Hamlet, Nehes Liah Bing Village.

The company also has a social impact identification document, namely the DSNG Partnership Community Smallholder Social Impact Identification Study for July 2016. The study was carried out professionally by independent assessors involving affected parties including meetings with the Muara Wahau Village Head, Muara Wahau Village Secretary, Muara Wahau Customary Head, General Head of Muara Wahau Village, Head of Miau Baru Customs, Head of Miau Baru Village, Head of Makmur Jaya Village, workers, drivers, housewives, and other stakeholders. The assessment method involved document review, participatory observation, structured in-depth interviews and focus group discussions. The DSN Group Partnership Community Smallholder Social Impact Study field activity was carried out from 13 – 21 April 2016.

The SIA study explains the impact arising from the existence of the DSNG partnership farmers on employees and farmers, including those related to welfare, income and working conditions. Some of these issues include limited electricity and water, TPA and children dropping out of school, pesticide applicators do not receive additional supplements and PPE. Some of these issues are not caused by the company's official policy however becomes a social risk that must be faced.

Company and the impact of company management policies or practices. The DSN Group CSR program states that it will provide housing, electricity and clean water facilities for its employees. In fact, it can be said that the company initially provided housing facilities that were quite good, equipped with electricity facilities from *PLTD*.

In addition, there are social potentials and impacts on the community in their environment based on the stages of plantation development. Social issues in the villages surrounding the company and DSNG partnership activities include local people farming failed to harvest, the price of FFB has fallen, there is an orangutan habitat restoration program, there is a perception that cooperative management is less transparent, village boundary conflicts will recur, land administration is not yet orderly, the presence of partnership plantation encroachers will lead to conflict, uncontrolled burning will endanger the plantation, limited access to economic resources due to status change, competition for labor recruitment, increased community income, low employee organization, and increased noise intensity, as well as public perceptions of the existence and benefits of partnership plantations. A social impact assessment is included as part of a complement to all environmental impact assessments. Participatory evidence with affected parties is shown in the form of interview photos at the FGD meeting. The report also contains a matrix of the Social Management Plan and Social Monitoring Plan which contains recommendations for the management of identified social impacts.

Environmental assessment results documents, HCV assessment results documents, local government regulations and CSR implementation as material for consideration for social impact management recommendations. Based on the verification of these documents, it can be concluded that all social impacts from plantation activities have been identified and management recommended by referring to relevant laws and regulations.

High Conservation Value Assessment (HCVA)

The unit of certification has conducted an assessment of areas with high conservation value as evidenced based on the results of the 2012 HCV Study conducted by Daemeter Consulting led by Neville Kemp MSc. The HCV study was carried out from November to December 2011 for the DSNG scope. This study describes the impacts arising from plantation activities on the environment, social, and protected flora and fauna. The HCV assessment also involves several affected parties, both internal and external stakeholders. HCV assessment methods include collecting secondary data in the form of land cover data, topographic data, ecosystem mapping, species data, and socio-cultural data. Primary data collection includes field verification of topographical conditions, surveys of plants, mammals, buttocks and social and cultural surveys to assess HCV 5 and 6.

Based on the description above, it shows that the unit of certification has carried out an Assessment of social and environmental impacts in new plantings or operations including PKS, carried out independently and participatively by involving affected stakeholders.

3.4.2

The unit of certification has carried out efforts to manage and monitor social and environmental impacts independently by involving affected stakeholders. Some evidence of documentation of activities that have been carried out are as follows:

Environmental Impact Assessment (EIA)

Based on the results of the verification of the *UKL-UPL* 2nd Semester of 2022 documents, it can be concluded that all management and monitoring parameters requested in the environmental document matrix have been carried out. The unit of certification has also evaluated each parameter of significant impact monitoring carried out as required in KepmenLH 45 of 2005, which includes trend evaluation, critical level evaluation, and compliance evaluation. Based on the results of the evaluation, it is known that there are no parameters that are not in accordance with the applicable Quality Standards, and based on the results of interviews, document analysis and observations there are no indications of environmental pollution in the area around the company, this is explained in each related indicator. The effectiveness of environmental management and monitoring can be seen from the results of the analysis and the suitability between the management and monitoring plan and its implementation in the field. Several things can be concluded from the results of the 2022 *UKL-UPL* document review, including:

- There is no test result value that is above the quality standard for POME parameters that are disposed of in the application area.
- There is no test result value above the quality standard for emission, air quality and ambient parameters.
- Improving outreach and monitoring to prevent encroachment on protected area areas.
- Utilizing palm oil mill solid waste as a substitute for fertilizers and fossil fuels.
- Community Development activities for recruiting local people as employees are considered quite effective in avoiding social conflicts and controlling community unrest.

Based on the results of field observations in the EFB storage area, WWTP area and conservation area, there were no indications or potential for environmental pollution from company activities. The results of interviews with the Head of Miao Baru Village and the Head of Nehas Village Liang Bing also stated that they did not feel any environmental impact related to the company's operational activities. The company has also carried out environmental management in accordance with *UKL-UPL* by installing signboards for conservation areas, prohibiting land burning, planting local plants on canal borders and so on. Based on the results of interviews with sprayer and fertilizing officers, they also stated that they were aware of the ban on the use of chemicals in locations close to water sources such as canals, reservoirs or artificial ponds.

The unit of certification has made a *UKL-UPL* report every semester which refers to the environmental management and monitoring matrix. Environmental management reports are carried out every 6 months and submitted to relevant agencies, for example the *UKL-UPL* Semester 2 Year 2022 Report which was sent to the Kalimantan Timur Province Environmental Service with proof of receipt dated 26 January 2023 which is accompanied by a stamp, signature and name of the recipient. Based on the results of interviews with the Environmental Agency regarding reporting on *UKL-UPL* implementation, the unit of certification routinely conducts this and until the time the audit was conducted there were no complaints or conflicts related to the environment from NGOs or local communities around the company.

Social Impact Assessment (SIA)

The document on the results of the SIA review was prepared in June 2013 as a guide in preparing the social impact management program which is updated every year, for example, the 2022 Environmental Management and Monitoring Plan document with Affected Parties. The document contains several social programs, including regular social assistance for the surrounding community, increasing the economy through cooperation with companies, opening job vacancies, and increasing welfare through community empowerment programs. Program planning was carried out based on the results of the Focus Group Discussion on 19 October 2022 for the scope of Nehas Liah Bing Village and on 20 October 2022 for the scope of Miao Baru Village including the village community around the company. The results of potential and risk analysis with documentary evidence and absences are attached in the minutes. The program is a general plan that will be implemented by the company based on an analysis of stakeholder needs and mapping of stakeholders who are directly or indirectly related to the company. Thus, the planned program is directed as much as possible to strengthen the company's relationship, communication and cooperation with all stakeholders.

The company evaluates the Management Plan annually to monitor the progress of program management. Monitoring the management of social impacts in 2022 includes the external environment and internal environment. The following are some social impact evaluations on the environment:

- The DSNG and the community will carry out further coordination regarding the management of cultural heritage and the

management of NTFPs and some input from the community will be considered in the planning and implementation of the CSR program.

- Miau Baru *Pokdarwis* Related to culture and consistency of local craft assistance.
- Indigenous language and culture are very much needed in the community that is under the auspices of the village institution.
- A discussion forum is needed to exchange ideas so that we can see the root of the problem in order to realize a program that is right on target and sustainable.
- DSNG is committed to protecting forests so that ecosystems can be maintained.

As for the social impact evaluation in the internal environment, including:

- The company facilitated the formation of LKS Bipartite and Gender Committees in each estate as a forum for employees to express their aspirations with management.
- Communication practices between superiors and subordinates, often not according to the hierarchy. For example, the manager can order directly to the foreman but the foreman's direct supervisor does not know the order, causing miscommunication between employees.
- FFB transportation and company mobilization have used the main corridor route which is far from the village and employee settlements, so that the noise level is low and does not disturb residents' settlements and employee settlements.

Interviews with LTE employees also stated that there was no form of discrimination against workers, no young workers were found, the company had also fulfilled the rights of its employees, several important facilities for employees had been provided by the company such as housing, water, electricity, places of prayer, and other means. The company also allocates resources for the maintenance of all facilities. Based on the results of field observations and interviews, it can be concluded that there are no issues related to social impacts that have not been identified by the company. All potential social impacts have been properly managed.

3.4.3

The unit of certification has made efforts to implement the management and monitoring of social and environmental impacts as described in indicator 3.4.2. In addition, the certification unit also makes periodic efforts to update the management in a participatory manner. Some of the documented evidence of efforts that have been made are as follows:

Environmental Impact Assessment (EIA)

The company involves the Department of Environment and the Ministry of Environment and Forestry to monitor the results of environmental management that has been carried out by the company in the form of presenting *UKL-UPL* reports and other environmental management documents which are sent every certain period which can be proven in indicator 1.1.2. The company also does not block all environmental agencies from entering if they are going to carry out field verification in their management area. It aims to obtain suggestions and improvements in carrying out environmental management in accordance with the government's vision, mission and programs so that they can run synergistically. This can be proven based on the results of interviews with the Kutai Timur Regency Environmental Service, it is known that there are no environmental pollution issues. Monitoring and updating related to the management of environmental impacts is also carried out simultaneously with the evaluation of HCV management which is explained in more detail in indicator 7.12.4. But in general, all recommendations from the evaluation of HCV management which are carried out in a participatory manner will be carried out in line with the management and monitoring of environmental impacts.

Social Impact Assessment (SIA)

Based on the analysis of the 2022 Environmental Management and Monitoring Review Report with Affected Parties, the social impacts in this assessment are divided into social impacts, economic impacts and environmental impacts. The social impact assessment is carried out based on the perceptions of community representatives in the assessment location that represent the community. The company has analyzed the positive and negative impacts arising from each activity specifically, for example physical assets for production activities that have positive and negative impacts both on the external and internal levels, and so on as explained in indicator 3.4.2. The company conducts annual evaluations to align data collection related to public perceptions regarding the Management Plan SIA and adjust it to the latest requirements according to conditions in the field.

On 19 and 20 October 2022 the company has conducted a review of social impact management for the period 2021 – 2022,

where the process has been participatory involving relevant stakeholders, namely the government and community representatives from Miao Baru Village and Nehas Liang Bing Village. In the review activities, the company applies 4 methodologies, namely:

- Study Desktop
- Field observation
- Deep Interview with sources
- Focus Group Discussion (FGD) with community groups.

There are recommendations from the SIA documents of PT. DNSG and *UKL-UPL* documents related to social environmental impact management. For example, there are problems with limited access to economic resources due to status shifts and dependence on sources of income from the service sector as employees so that residents are no longer interested in pursuing other types of work. This will be managed through socialization and communication to provide a complete understanding to the community about the goals and activities of the company as well as the benefits derived from the company's presence in the vicinity of the community, the realization of plasma plantations and the implementation of the CD/CSR program in the economic sector.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1

The Company had procedures related to recruitment, appraisal, promotion, remuneration, and termination of employment which are generally described in the Company Regulation period of 2022 to 2024 written in *Bahasa*. The company regulation in PT. Dharma Satya Nusantara, PT Dewata Sawit Nusantara and PT. Karya Prima Agro Sejahtera has been registered in manpower agency of Kalimantan Timur on 18 April 2022. In general, these procedures describe:

- Recruitment of workers is based on the company's needs.
- The minimum age of workers is 18 years old.
- The workers who have been accepted will through three months of probation.
- Promotion of workers is based on needs, period of work, expertise, and assessment of workers for the last 6 months.
- The company is authorized to carry out the placement, transfer, and promotion of workers by applicable regulations.

In addition, the procedures of employee recruitment, appraisal, promotion, and remuneration are explained specifically in several SOPs. These procedures have been documented and socialized to all workers and their representatives, here as follows:

- SOP No. SOP-AGR-012-R03 dated on 01 December 2019 concerning on Recruitment.
- SOP No. SOP-AGR-014-R00 dated on 15 February 2013 concerning on Worker's Appraisal.
- SOP No. SOP-AGR-017-R01 dated on 19 October 2015 concerning on Worker's Promotion and Mutation.
- SOP No. SOP-AGR-013-R00 dated on 15 February 2013 concerning on Worker's Placement and Orientation.

Based on the interviews with workers (harvesters, pesticide sprayers, and mill operators), workers had a sufficient understanding of the procedures related to recruitment, promotion, and termination of employment. The types of workers exist in the company are permanent workers in probation and permanent workers. Workers explained that the recruitment process carried out by the company was in accordance with the terms according to ability, promotion is based on an assessment of the performance of each employee each year, and termination of employment can occur if the worker has committed a serious violation and other causes of termination as in existing government regulation. All labor procedures have been in accordance with the applicable regulation.

3.5.2

Recruitment, Selection, Acceptance, Promotion

- Information on job vacancies as harvest workers which are open from January to December 2022 which do not contain elements of discrimination, etc.
- Job application letter and its accessories for the Partnership 7 harvest worker with the initials "YD", Medical Check Up results for prospective employees dated May 25 2022, Work Agreement for Unspecified Time No. 014/DWT-KM7/SPK-PKWTT/WHU/VI/2022 dated 30 May 2022 with a probationary period of 3 months which a copy has been received by the

employee concerned according to BAST dated 30 May 2022, Employee Evaluation Form dated 31 August 2022 with the result "appointed permanent employees" which is accompanied by Employee Appointment Decree No. 037/DWT/KM-7/SK/WHU/VIII/2022 dated 31 August 2022.

- Job application letter and its accessories for Partnership 7 harvest workers with the initials "OAWN", results of Medical Check Up of prospective employees dated May 25 2022, Work Agreement for Unspecified Time No. 015/DWT-KM7/SPK-PKWTT/WHU/V/2022 dated 30 May 2022 with a probationary period of 3 months which has received a copy by the employee concerned according to BAST dated 30 May 2022, Employee Evaluation Form dated 1 September 2022 with the result "appointed permanent employees" which is accompanied by Employee Appointment Decree No. 033/DWT/KM-7/SK/WHU/VIII/2022 dated 1 September 2022.

Pension and Termination

Based on the results of interviews with management, it was stated that in the last 1 year period there were no employees who retired or had their employment terminated.

Based on the interviews with the Manpower Agency of Kutai Timur, the company had been applied the existing labor procedures in accordance with the regulations and also there were no issues related to manpower.

Status: Comply

3.6

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

3.6.1

Unit certification unit has also established a procedure for mitigating HSE DSN Group problems with the number SOP-AGR-037-R01 dated November 01, 2013, the procedure includes risk identification, risk assessment and control in the risk assessment matrix, safety induction/orientation, OHS inspection schedule, initial accident and non-conformance reports, investigations, accident and incident reports, work permits, etc.

The certificate unit has also carried out a risk assessment to identify Occupational Health & Safety issues for PT. KPAS and PT DSN (POM 7). The document contains identification of each type of activity, source of hazard, risk/impact, risk assessment, operational control, type of control, and risk evaluation. This assessment covers all hazards and risks in the plantation, such as land clearing, manual plant care, plant pests and diseases, harvesting and transportation, mechanical harvesting, FFB transport by grabber, manual fertilization, mechanical fertilization, pesticide application, land application, FFB Processing, etc.

Risk Assessment for each type of work is well defined and documented by the company. As a sample:

- Hazard identification & Risk Assessment and Control (HIRAC) Estate (LTE and KM9 Estate): Harvesting, Spraying, Selective Weeding, Fertilizing, Workshop, Monitoring, Storage, WTP, etc updated on 2 January 2023.
- Hazard identification & Risk Assessment and Control (HIRAC) Estate (KM7): Harvesting, Spraying, Selective Weeding, Fertilizing, Workshop, Monitoring, Storage, WTP, etc updated on 2 January 2023.
- Hazard Identification & Risk Assessment and Control (HIRAC) Factory Covering Activities at POM 7 Parking FFB, WB, Grading, Loading Ramp, Sterilizer, Tripler, Press, Press, Boiler, etc. updated on January 2, 2023.

Based on field observations and interviews with pesticide workers, and operators at POM 7, it is known that the officers have understood the potential work risks and how to minimize these risks.

3.6.2

Based on employee verification and interviews, that there is no change in either the SOP and the Policy. The company has an OHS policy which was established on December 1, 2010 by CE AGRO in Jakarta. The company also pointed out the procedures for Occupational Safety and Health and the Environment (K3L) of the Group DSN (SOP-AGR-037-R01) dated November 1, 2013 which was approved by the Executive Director of SBU Agro I.

Unit certification has established a P2K3 organization with a management structure that has been approved by the Department of Manpower and Transmigration of Kalimantan Timur Province, namely:

- The company has established a *P2K3* structure for plantations and factories that have been registered with the relevant agencies. OHS experts in plantations and factories also have certificates and SK OHS Expert from the Minister of Manpower. Appointment of OHS Expert PT. KPAS with SK number 500.15.18.5/528/P2K3/PPK/DTKT/II/2023 which is valid until February 2, 2026. Application for submission of OHS Expert training PT. DSN with number 195/EXT-DPJ/VII/2022 on 14 July 2022.
- The company has established a *P2K3* structure for plantations and factories that have been registered with the relevant agencies. OHS experts in plantations and factories also have certificates and SK OHS Expert from the Minister of Manpower. Appointment of OHS Expert POM 7 decree number 500.15.18.5/530/P2K3/PPK/DTKT/II/2023 which is valid until February 2, 2026. Application for submission of OHS Expert training PT. DSN with number 195/EXT-DPJ/VII/2022 on 14 July 2022.

Unit certification shows the hazard identification document and estate risk assessment and POM 7 prepared by the OHS Expert. The document describes the type of activity, identification of hazards, risks/impacts, conditions, risk assessment, risk control, and information. The company also directs regular general and special examinations conducted by company doctors in June 2021, March 2022 and April 2022. Unit certification has reporting of the OHS program in the OHS Committee report that has been reported by the Department of Manpower and Transmigration of Kalimantan Timur Province, both for estate and mill period 2022.

Status: Comply

3.7

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

3.7.1

The Company had training identification and program for 2023 in order to improve the competence and expertise of all workers including contractors. The company had identified the needs of competence standard and the proposed training for each worker including contractor worker for each unit, for example:

- Mill 7: Warehouse administration, personnel administration, ISO, ISPO, RSPO, SCCS and ISCC, Mill flow process and problem analysis, etc.
- KM 7: Leaf sampling training, rat pest control training, first aid, HSE and Emergency Response, etc
- LTE: Labor law, pesticide training, supervision of IPM foremen, etc.
- KM 9: How to care for children and first aid, training on detection of plant pests and diseases, training for generator operators and hazardous waste, etc.

Based on the results of field observations in the Engine Room, information was obtained that the equipment in St. The Engine Room consists of 3 units of generator engines (capacity of 400 KW, 400 KW and 160 KW), as well as a turbine with a capacity of 1,600 KW. Based on document review and results of interviews with operators in the engine room station, it is known that the division of work shifts consists of 3 shifts with each shift consisting of 1 operator. Then, as many as 2 operators already have OHS Motor Diesel Class 1 Licenses and 1 other worker is currently submitting OHS Motor Diesel training to *PJK3*.

Based on this explanation, the Company is encouraged to ensure that the implementation of the training that has been submitted to *PJK3* can be carried out so that this becomes an opportunity for improvement. **(OFI)**

3.7.2

Companies can show records of training available to each worker, for example:

- Nufarm Pesticide Training for workers in LTE on 22 February 2022 with a total of 20 participants.
- Basic childcare skills training for Daycare KM7 officers on April 5, 2022.
- Nufarm Pesticide Training for workers at KM9 on 22 and 23 February 2022 with a total of 14 participants.
- PK and PKO production process training on April 8, 2022 for PKS 7 workers with a total of 4 participants.
- Dissemination of the prohibition of forced labor, slavery and the prohibition of child labor on 26 December 2022 at PKS 7 which was attended by 29 participants.

- Socialization at PKS 7 on 4 January 2023 regarding the 2023 Minimum Wages, Quality Policy, BPJS Employment & Health, Human Rights Declaration, Company Regulations, PPE, Code of Ethics and OHS which was attended by 30 participants.
- Socialization at PKS 7 on 6 June 2022 regarding the mechanism for complaints against workers, which was attended by 41 participants.
- Socialization at PKS 7 on 26 December 2022 regarding the prohibition of forced labor, slavery and the prohibition of child labor which was attended by 29 participants.

3.7.3

The company shows footage of the product traceability training which was held on April 26, 2022, with participants from grading officers, weighers, security guards, and laboratory staff. Based on the results of interviews with weighing officers at POM7 it is known that workers are able to explain their job responsibilities well and know how to record certified and non-certified FFB.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 & 3.8.2

Based on the field observation to PKS7, the results of a review of FFB receipt documents, and interviews with officers receiving FFB, it is known that the sources of fruit processed by POM 7 are from certified areas and non-certified areas so that the module used is Mass Balance.

3.8.3

Estimated certified product recorded in the last assessment report. The estimates of certified production for the next license period describe at ASA-2 report (basic info 1.8.3), in reasonable amount taking into account the last year's production. The data are shown in the following table:

		Last Year Projected Certified Volume (02 October 2022 – 01 October 2023) (MT)	Actual (April 2022 – March 2023) MT	Estimate Production of 12 month (MT) further
FFB	Certified (MT)	60,764	37,435.519	36,000
	CSP0 (MT)	13,914	8,471.117	8,100
	CSPK (MT)	2,424	2,017.702	1,620

3.8.4

The Mill has registered as RSPO member under PT Dharma Satya Nusantara (No. 1-0135-12-000-00) and also has been registered in IT platform palm trace RSPO <https://palmtrace.rspo.org/web/rspo/member-directory> which information as follows:

- Member Name: Dharma satya Nusantara_PKS 7
- License ID: CB139031
- Core Product: Palm Oil
- Member ID: RSPO_PO1000010240
- Type of Business: Oil Mill

3.8.5

The Mill has had procedures related supply chain, such as Work Instruction of Traceability of CPO, PK and PKO in MB Model (No. IK-AGR-MS-04-R12 dated 1 March 2021). These procedures have referred to the latest RSPO Supply Chain System. The procedure has covered all aspects in SCCS MB model, such as receiving and recording that identify the traceability of RSPO certified and uncertified source and products, FFB processing, the announcement in RSPO Palmtrace, key persons such as security, weight bridge clerk, dispatch/kernel officer, production clerk, Administration Head, as well as the training.

Based on interviews in POM 7 note that the weightbridge operators understands the supply chain management system. It also known that training and refreshment (awareness) of supply chain management system were carried out annually.

3.8.6

The procedure for internal audit for SCCS mentioned in Work Instruction of Traceability of CPO, PK and PKO in MB Model (No. IK-AGR-MS-04-R12 dated 1 March 2021). Based on that procedure internal audit carry out minimum once a year. Based on document review, the company show the record evidence regarding internal audit of RSPO SCCS that conducted on 24-25 February 2023. Based on result of internal audit, there is 1 (one) non conformity regarding SCCS indicators.

Management Review of RSPO SCCS implementation conducted on 10 April 2023. The management review discussion has covered the input from internal audit result, correction and corrective action, process performa and product compliance, follow up of previous management review, and I for improvement.

3.8.7

The mill has verified and documented the volumes of certified and non-certified FFBs received. Certified and non-certified FFB received period of 12 months before audit which is April 2022 – March 2023:

Period	FFB (Ton)		
	Certified	Non-Certified	Total
April 22	4,748.017	19,168.916	23,916.933
May 22	3,443.979	24,043.676	27,487.655
June 22	4,352.000	33,222.121	37,574.121
July 22	3,076.548	32,260.324	35,336.872
August 22	2,781.550	33,570.094	36,351.644
September 22	3,950.730	30,309.000	34,259.730
October 22	4,009.050	30,222.199	34,231.249
November 22	2,393.270	33,028.873	35,422.143
December 22	1,682.410	33,363.352	35,045.762
January 23	2,813.170	25,332.714	28,145.884
February 23	3,232.000	21,795.604	25,027.604
March 23	952.795	23,319.158	24,271.953
Total	37,435.519	339,636.031	377,071.550

Estimated certified product recorded in the last assessment report (ASA-2). Actual certified produced has been verified during this assessment. The data are shown in the following table:

Products		Last Year Projected Certified Volume (02 October 2022 – 01 October 2023) (MT)	Actual (April 2022 – March 2023) MT
FFB Certified (MT)		60,764	37,435.519
CSPO (MT)		13,914	8,471.117
CSPK (MT)		2,424	2,017.702

In the SCCS manual it is mentioned that the handling of nonconforming products is as follows:

- If the validity of the certificate has expired, the Commercial Dept. The head will clarify the certificate owner, and if there is no proof of extension of the validity period, then the product is treated as a non-Certified product.
- Regarding external FFB products if the quality of the products sent is below the standard that has been determined, then the provisions of deductions (fines) for external FFB refer to IK-AGR-LAB-01 regarding grading.

3.8.8

The mill has product information provided in such as document of weighbridge ticket, delivery order and other invoices, as example at invoices of CPO certified delivery on 04 February 2023. The information provided on invoices are:

- The name and address of the buyer (PT Smart Tbk);
- The name and address of the seller (PT Dharma Satya Nusantara)
- The loading or shipment / delivery date (03 February 2023);
- A description of the product supply chain model (MB)
- The date on which the documents were issued (04 February 2023);
- The quantity of the products delivered (200 MT);
- A unique identification number (RSPO-SCCS-MB-82450315017-040223-07);
- RSPO certificate number (RSPO SCCS Reg.No.824-503-15017);
- etc.

3.8.9

The outsourcing activities carried out are in the field of transporting CPO and PK to KCP belonging to the group companies. The Cooperation Association has been stated in the work agreement letter, which is shown in the following documents:

- Work Agreement with Teodorus Telea (No. 020/DSN/DIS/2023) for the transportation of CPO at POM 7 dated 1 January 2023 which is valid for one year (1 January 2023 to 31 December 2023).
- Work Agreement with Sandi Amdia (No. 008/DSN/KCP/2023) for Kernel transportation at POM 7 dated 1 January 2023 which is valid for one year (1 January 2023 to 31 December 2023).
- Work agreement with the *Koperasi Serba Usaha* Putra Wahau (No. 013/DSN/DIS/2023) for the transportation of CPO at POM 7 dated 1 January 2023 which is valid for one year (1 January 2023 to 31 December 2023).

In article 4 point R the two agreements have stated the third party's willingness to provide full access to CB in the event that an audit is required.

3.8.10

The third parties that handle POM7 certified products are CPO transporters and kernel unit rentals as follows:

No	Name of Contractor	Work	Agreement Number	Validity period
1	Yordan Irang	Rent kernel units	013/DSN/KCP/2023	01 Jan – 31 Dec 23
2	Sandi Amdia	Rent kernel units	008/DSN/KCP/2023	01 Jan – 31 Dec 23
3	BUMDES Lias Wehea	Transport CPO	004/DSN/DIS/2023	01 Jan – 31 Dec 23
4	C.Vandie Wilson	Transport CPO	005/DSN/DIS/2023	01 Jan – 31 Dec 23
5	CV Anugerah Mulia Abadi	Transport CPO	006/DSN/DIS/2023	01 Jan – 31 Dec 23
6	CV Kayan Tunggal Lestari	Transport CPO	007/DSN/DIS/2023	01 Jan – 31 Dec 23
7	CV Kongbeng Bersatu	Transport CPO	008/DSN/DIS/2023	01 Jan – 31 Dec 23
8	CV Paris Indo Lisensi	Transport CPO	009/DSN/DIS/2023	01 Jan – 31 Dec 23
9	CV Putra Jaya Mandiri	Transport CPO	010/DSN/DIS/2023	01 Jan – 31 Dec 23
10	CV Rifika Perdana	Transport CPO	054/DSN/DIS/2023	01 Jan – 31 Dec 23
11	CV Sumber Energi	Transport CPO	011/DSN/DIS/2023	01 Jan – 31 Dec 23
12	CV Three Putra	Transport CPO	012/DSN/DIS/2023	01 Jan – 31 Dec 23

13	KSU Putra Wahau	Transport CPO	013/DSN/DIS/2023	01 Jan – 31 Dec 23
14	PT Bazarana Sejahtera	Transport CPO	014/DSN/DIS/2023	01 Jan – 31 Dec 23
15	PT Farchin Fhott Asia	Transport CPO	021/DSN/DIS/2023	01 Jan – 31 Dec 23
16	PT Nenggapratama Internusantara	Transport CPO	015/DSN/DIS/2023	01 Jan – 31 Dec 23
17	PT Roni Putra Abadi	Transport CPO	016/DSN/DIS/2023	01 Jan – 31 Dec 23
18	PT Sarana Raya Kalimantan	Transport CPO	017/DSN/DIS/2023	01 Jan – 31 Dec 23
19	PT Sejahtera Membangun Nasional	Transport CPO	055/DSN/DIS/2023	01 Jan – 31 Dec 23
20	PT Sumber Harapan Jaya	Transport CPO	018/DSN/DIS/2023	01 Jan – 31 Dec 23
21	PT Trans Tri Jaya	Transport CPO	019/DSN/DIS/2023	01 Jan – 31 Dec 23
22	Teodorus Telea	Transport CPO	020/DSN/DIS/2023	01 Jan – 31 Dec 23

3.8.11

Based on the document review and interviews with management representatives, it was found that there were no additional contractors from the previous assessment.

3.8.12

POM7 has record of all Certified FFB, CSPO and CSPK as presented in the table below:

CPO

Period	CPO Production (ton)			CSPO Despatch (ton)			
	Certified	Non-Certified	Total	RSPO	Other Scheme	Conventional	Total
Stock	47,326	383,145	430,471	-	-	-	-
April 22	1,116.943	4,612.000	5,728.943	1,075.940	0	0	1,075.940
May 22	783,183	5,354.591	6,137.774	795,280	0	0	795,280
June 22	1,011.385	7,752.384	8,763.769	940,290	0	0	940,290
July 22	704,411	7,252.487	7,956.898	832,990	0	0	832,990
August 22	628,583	7,658.940	8,287.523	586,910	0	0	586,910
September 22	898,282	6,902.829	7,801.111	900,700	0	0	900,700
October 22	893,607	6,602.684	7,496.291	909,550	0	0	909,550
November 22	531,823	7,275.409	7,807.232	552,400	0	0	552,400
December 22	353,635	7,296.018	7,649.653	358,090	0	0	358,090
January 23	596,577	5,272.611	5,869.188	570,490	0	0	570,490
February 23	685,986	4,737.598	5,423.584	679,430	0	0	679,430
March 23	219,376	5,255.836	5,475.212	252,660	0	0	252,660
Total (April 2022 – March 2023)	8,423.791	75,973.387	84,397.178	8,454.730	0	0	8,454.730

Grand Total	8,471.117	76,356.532	84,827.649	8,454.730	0	0	8,454.730
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PK

Based on the verification of mass balance documents for PK products (January 2022 to March 2023) it is known that there is negative stock in the following period with details:

Period	PK Production (Ton)		PK Delivery (Ton)			Stock
	Certified	Uncertified	Certified	Other Scheme	Non Certified	Certified
Stock Opening						90.793
Jan-22	150.298	674.339	149.688	-	-	91.403
Feb-22	143.721	785.618	311.775	-	-	(76.651)
Mar-22	165.547	834.692	181.233	-	-	(92.337)
						Negative
Apr-22	200.924	828.503	204.931	-	-	(96.344)
May-22	140.969	970.334	141.780	-	-	(97.155)
Jun-22	174.014	1,336.142	155.206	-	-	(78.347)
						Negative
Jul-22	123.137	1,273.697	132.094	-	-	(87.304)
Aug-22	111.341	1,357.083	111.851	-	-	(87.814)
Sep-22	162.341	1,249.946	153.302	-	-	(78.775)
						Negative
Oct-22	158.974	1,172.325	156.455	-	-	(76.256)
Nov-22	91.000	1,245.721	98.264	-	-	(83.520)
Dec-22	56.885	1,154.868	54.075	-	-	(80.710)
						Negative
Jan-23	96.892	853.572	90.024	-	-	(73.842)
Feb-23	116.163	806.998	0	-	-	-
Mar-23	34.703	850.363	0	-	-	-
Total	2,017.702	15,394.201	1,940.678	-	-	-

The company has not been able to ensure the balance of all receipts of RSPO certified FFB and shipments of RSPO certified CPO and PK every three months. **NCR No. 2023.03 with Major category.**

3.8.13

CPO (OER) and PK (KER) production conversion rates are based on actual production. Then management will monitor whether the rate is reasonable. Based on audit production data for the previous 12 months, the average OER was 22.55%, while KER was 3.47%.

3.8.14

The conversion rate of production of CPO (OER) and PK (KER) were based on three monthly basis. Then the management will monitor if the rate reasonable.

3.8.15

SCSS module used in POM 7 is Mass Balance (MB), because the mill receives FFB from the estate RSPO certified and from third party that non-certified RSPO.

3.8.16

Based on document verification and interview with management representative obtained information in last 10 months before

audit (April 2022 – March 2023) it was known if the certified product sold under RSPO as described in the table below:

	Dispatch period (MT)
	April 2022 – March 2023
	Total
CSPO sold under RSPO Scheme	8,454.730
CSPO sold under other scheme	-
CSPO sold as conventional	-
CSPK sold under RSPO Scheme	1,940.678
CSPK sold under other scheme	-
CSPK sold as conventional	-

Examples of shipping documentation among them for Transaction ID: TR-96b769ca-a29c are as follows:

- Seller member name: Dharma Satya Nusantara_PKS7
- Buyer member name: PT Dharma Satya Nusantara, Tbk (Labanan Storage Facility)
- Product name: CSPO
- Volume: 68.02 MT
- Shipping/BL Date: 20/12/2022
- Creation date: 21/12/2022
- Confirmation date: 21/12/2022

3.8.17

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

3.8.12 Status: NCR No. 2023.03 with Major category.

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

The company already has human rights policies, one of which is contained in the DSN Group Sustainability Policy which was signed by the Chief Executive Officer on July 8, 2021. In short, this policy explains respect for rights including:

- Adhere to the principle of free, prior and informed consent in any new land development.
- Resolve conflicts and disputes through engagement and consultation with affected local communities and their representative institutions.
- Handle disputes by adhering to the principle of equality and free from intimidation, violence and harassment.
- Respect the right of local people to practice their ancestral culture and beliefs.
- Practice ethical recruitment under fair conditions.
- Respect workers' freedom of association and the right to collective bargaining.
- Respect workers' freedom of association, promote workforce diversity and prohibit all forms of harassment, child labor and forced labour.
- Promote safe and healthy working conditions in all DSN Group activities.
- No person may experience discrimination in employment, including hiring, compensation, promotion, training, disciplinary action, termination of employment or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, gender identity, nationality, opinion political, social group, ethnic origin, reproductive rights or other forms of discrimination.

Based on the results of interviews with workers (harvesters, maintenance, mill operators), trade union representatives, contractors and village representatives (Nehes Liah Bing Village and Miau Baru Village), information was obtained that

stakeholders already had knowledge regarding the company's human rights policies and so far there has never been a dispute regarding human rights violations committed by the company.

4.1.2

There is no evidence that the company uses mercenaries and/or paramilitaries in its operational activities. Based on interviews with stakeholders (i.e. Government Agencies, Village Representatives, Trade Unions & Labor Unions) as well as online searches it was revealed that the company does not incite violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operational activities.

Status: Comply

4.2

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

4.2.1

The company showed some policies related to grievance system, here as follows:

- SOP No. SOP-AGR-054-R03 dated on 30 October 2020 concerning in handling any grievances. The policy explained activities of handling grievances related to manpower or non-manpower (e.g: facilities, etc).
- SOP No. SOP-AGR-044-R02 dated on 14 October 2019 concerning in communication and handling external grievance. The policy explained the mechanism of external communication (e.g: contractors, suppliers, government agency, residents, and NGO) including the mechanism if there were any grievances whose response is given no later than 4 days. This policy 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 whistleblower if needed.
- SOP No. 042/DSN/CHC/III/2021 dated on 18 March 2021 concerning whistleblowing system policy. The policy explained the company regulation in reporting violation complaints and protecting and providing security for whistleblowers or witnesses in DSN group work.

Based on the interviews with the surrounding communities (Nehes Liah Bing Village and Miau Baru Village), and workers (harvesters and mill operators), the workers had a good understanding of the communication procedures and personnel who served as communicators between the company and the community so that illiterate people can be informed by the related communicators.

4.2.2

Unit of certification showed SOP No. SOP-AGR-054-R03 dated on 30 October 2020 concerning handling any grievance. The policy explained activities of handling grievances related to manpower or non-manpower (e.g: facilities, etc). In the general mechanism of handling grievance, is stated as follows:

- The company's commitment to protect the anonymity of whistleblowers.
- Submission verbally or in writing to the contact person of the company or through labor union.
- Responses will be given at a maximum of 4 working days.

In addition, The Company also has SOP No. SOP-AGR-044-R02 dated on 14 October 2019 concerning communication and handling external grievance. This policy explained that all complaints will be summarized by Legal Department or CSR Operation Department Head and recorded in the List of External Complaint Monitoring. However, illiterate people can submit their complaints through the village head or another representative from the stakeholder and also recorded in the External Complaint Logbook.

4.2.3

Records of internal and external complaints for example:

- Complaints from PKS 7 employees dated April 6, 2023 regarding the bedroom and kitchen lights that were off and a follow-up on the resolution was carried out by providing a replacement lamp on the same day.
- Submission of information from the people of Muara Wahau regarding road access improvements which were responded to on the same day and realized in the following 6 days.

4.2.4

The Company showed the SOP No. SOP-AGR-054-R03 dated on 30 October 2020 concerning in handling grievance and SOP No. SOP-AGR-044-R02 dated on 14 October 2019 concerning in communication and handling external grievance. These policies explained the mechanism of handling any grievances and access to the Manpower Agency (tripartite) and RSPO complaint system if the grievance didn't meet any solution.

Status: Comply

4.3

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

4.3.1

The company has evaluated and realized the 2021-2022 CSR program as an effort to support the welfare of the surrounding community. The program includes social and other aspects, including FG support for the development of UKM for the Miau Baru Village Women's group, Empowerment and Capacity Building of BUMDES, Assistance for School Children's Transportation, Contribution for the Construction of Kindergarten School Buildings, and Support for Health Activities in 2022 and 2023, Collaboration with the community for FFB transportation, CPO, Kernel, EFB, and building construction, to repair of road infrastructure in Miau Baru Village and Nehas Liah Bing Village. The program was prepared based on the results of discussions with community representatives, this is in line with the explanation from the Head of Miau Baru Village and the Head of Nehas Liang Bing Village.

Based on document reviews and explanations from representatives of the sustainability manager, the company has partnerships that support plantation operations such as plasma development.

Status: Comply

4.4

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

4.4.1

POM 7 Mill and its supply base has the land rights i.e Land Use Title (*HGU*), Building Right Title (*HGB*) and Freehold Title (*SHM*). With following detail:

Land Title Rights

- Has a HGU of 504.50 Ha for Long Teman Estate (PT KPAS) as HGU certificate No. 311 for an area of 300.93 Ha, certificate No. 312 for an area of 143.46 Ha, HGU certificate No. 313 for an area of 57, 75 Ha, and certificate No. 314 for an area of 2.36 Ha issued on 09 December 2019 is valid until 17 October 2054.
- Already have HGB for 2.8 Ha as certificate No.61 for an area of 0.8 Ha and certificate No.60 for an area of 2 Ha which was issued on 15 October 2019 valid until 09 October 2039.
- Already have SHM of 800 Ha for 400 farmers in *Kemitraan* 9, for example indicated by SHM No.159 and certificate number 16.09.08.07.1.00159 with an area of 2 Ha.

Plantation business permit

- Plantation Business Permit (POM 7), Approval of the Kutai Timur Regent, Number: 525/136/EKO.1-VII/2015, dated 27 July 2016 concerning Adding the Capacity of the Plantation Products Processing Industry of PT Dharma Satya Nusantara from the original 60 Tons of FFB/Hour located in Muara Wahau District and 60 Tons of FFB/Hour in Kongbeng District to 120 Tons of FFB/Hour for Palm Oil Commodities located in Kongbeng District and Muara Wahau District, Kutai Timur Regency, Kalimantan Timur Province.
- Palm oil plantation business permit (IUP) for PT Karya Prima Agro Sejahtera for a land area of \pm 5,000 ha located in Miau Baru Village, Kongbeng District, Kutai Timur Regency, Kalimantan Timur Province according to the Decree of the Kutai Timur Regent dated 9 February 2009 number 500/136 /EKO.2/II/2009.

Based on document verification, the following evidence was obtained:

1. The Seleg Sejahtera Bersama Cooperative (Kemitraan 7) already has documents on the Granting of Rights from the Kutai Timur Regency Land Office, namely:
 - Decree of the Head of the Kutai Timur Regency Land Office Number 42/2018 dated 14 August 2018 concerning the

- Granting of Property Rights in the name of Simson Lawai, DKK for 149 plots covering an area of 171.0522 Ha.
- Decree of the Head of the Kutai Timur Regency Land Office Number 77/2018 dated 5 October 2018 concerning the Granting of Property Rights in the name of Saut P. Napitupulu in 17 Fields covering an area of 15.9513 Ha.
- In the two decrees it is explained in the third part that in order to obtain proof of land rights in the form of a certificate of ownership, the recipient of the right is required to register the right of ownership at the Kutai Timur Land Office no later than 3 (three) months from the date of the decision.
2. Based on the results of interviews with management representatives, it is known that the Seleq Sejahtera Bersama cooperative has registered ownership rights and has issued certificates of ownership rights (SHM). However, until the audit was carried out, the SHM could not be demonstrated.

Based on this evidence, the Seleq Sejahtera Bersama Cooperative has not been able to show proof of ownership certificates (SHM) which show legal ownership of the land. **NCR No. 2023.04 with Major Category.**

4.4.2; 4.4.3; 4.4.4; 4.4.5; 4.4.6

Nehes Liah Bing Village Representative, Miau Baru Village and the Wehea Traditional Head the land release process by the community had been carried out according to the agreement of both parties and there was never any coercion from any party. The management of the plantation was deemed to have developed quite well after the DSN Group took over PT KPS around 2012. After the take over the company re-identified the GRTT process that had not been completed and carried out a complete completion.

Examples of documentation shown relating to the release of land rights, for example, for previous land owner Usman as follows:

- Minutes of *Tali asih* Number: /KPS-LTE/TA/2015 dated 28 October 2015 for arable land and growing crops based on legality and custom for an area of 10.8 Ha. With this handover, the main plantation pattern: Kemitraan (30: 70) will be developed. The funds paid are for 30% of the land area plus the 10.8 Ha Slashing Fund
- Payment receipt signed by Usman
- Letter of willingness to partner and build a partnership plantation
- Minutes of Land Measurement
- Land clearing approval
- Non-dispute statement
- Declaration of ownership. Land tenure
- Identity of land owner

The signing of these documents was witnessed by parties such as customary heads, village heads, land owners, company representatives and the sub-district head of Muara Wahau. Thus, it can be concluded that the land release process was based on an agreement, witnessed by the parties and applied the principle of FPIC.

4.4.1 Status: NCR No. 2023.04 with Major Category.

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 the results of document review and interviews with relevant stakeholders such as management representatives, the Wehea Traditional Head, Miau Baru Village Head, and Nehes Liah Bing Village Head, it is known that the acquisition of land for Long Teman Estate was initially take over from another company while KM9 was owned by land. The community facilitated by the company to plant oil palm, the results of which are intended for the welfare of the surrounding community.

Land clearing was carried out in the period 2008 – 2014 and since then there has been no expansion of the company's operational area. The title of PT KPS Long Teman Estate is HGU for an area of 504 Ha, while KM9, which is managed under the Karya Sejahtera Cooperative, has a right of title in the form of SHM with an area of 800 Ha. While KM7, which is managed under the Seleq Sejahtera Bersama Cooperative, has a right of title in the form of SHM with an area of 187 Ha.

Village representatives and customary heads said that the process of releasing land by the community had been carried out

according to the agreement of both parties and there was never any coercion from any party. The management of the plantation was deemed to have developed quite well after the DSN Group took over PT KPS around 2012. After the take over the company re-identified the GRTT process that had not been completed and carried out a complete completion.

Status: Comply

4.6

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

4.6.1 & 4.6.2

The company showed the communication and consultation procedure number 0215B / SWA-CSR-WHU / VI / 2012RI dated June 7, 2012. This procedure was agreed upon by the representatives of Benhes Village, Diak Lay Village, Deabeq Village and Nehas Liah Bing Village. This procedure explains and regulates the procedures for the company and the surrounding community, NGOs and other local organizations consulting regarding common interests and problems so that good & acceptable results of dialogue, discussion, deliberation can be achieved. The scope of procedures includes:

1. Request for information
2. Complaints / dissatisfaction.
3. Conflict
4. Demands for compensation
5. Violence
6. Consultation.

The procedure does not discriminate gender and provides equal treatment for both women and men. Based on document verification, interview with Head of Village Nehes Lias Bing and Miao Baru and field observation there is no conflict, claim and land dispute. The company been acquired the land from owners with FPIC.

4.6.3

Both women and men have the same opportunity to own plantation land rights. This is in accordance with the results of an interview with the Head of Miao Baru Village, Head of Nehes Liah Bing Village, who stated that there had never been a difference in opportunity based on gender. Apart from that, it can also be proven from the ownership of partnership smallholders where both men and women have the same rights.

4.6.4

The representative of Nehes Liah Bing Village, Miao Baru Village stated that the process of releasing land by the community had been carried out according to the agreement of both parties and there had never been coercion from any party. Plantation management is considered quite developed after DSN Group took over PT KPS around 2012. After the takeover, the company re-identified the unfinished GRTT process and carried out a complete settlement.

Examples of documentation shown relating to land rights relinquishment, for example for the previous land owner Usman are as follows:

Tali asih Minutes Number: /KPS-LTE/TA/2015 dated 28 October 2015 for fertile land and cultivation based on legality and custom covering an area of 10.8 Ha. With this handover, the main plantation pattern: Kemitraan (30 : 70) will be developed. The funds paid are for 30% of the land area plus the 10.8 Ha Cutting Fund

- Receipt of payment signed by Usman
- Letter of willingness to partner and build a partnership smallholder
- Minutes of Land Measurement
- Approval of land clearing
- non-dispute statement
- Ownership statement. Land tenure
- The identity of the land owner

The signing of the document was witnessed by various parties, such as customary heads, village heads, land owners, company representatives and the Muara Wahau sub-district head. Thus, it can be concluded that the land acquisition process is based on an agreement, witnessed by the parties and applies the principle of FPIC.

	Status: Comply	
4.7 Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.		
4.7.1; 4.7.2; 4.7.3 <p>The company indicated the communication and consultation procedure number 0215B/SWA-CSR-WHU/VI/2012RI dated 7 June 2012. This procedure was agreed upon by representatives of Benhes Village, Diak Lay Village, Deabeq Village and Nehas Liah Bing Village. This procedure explains and regulates the procedures for companies and surrounding communities, NGOs and other local organizations to consult on common interests and issues so that good & acceptable results of dialogue, discussion, deliberation are achieved. Based on interviews with the Village Heads of Nehes Lias Bing and Miau Baru, and the Management of the Karya Sejahtera Cooperative, it has been known that the community is entitled to the compensation identification method.</p>		
	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 <p>Based on interviews with the Head of Miau Baru Village, Head of Nehes Liah Bing Village and Head of the Karya Sejahtera Cooperative, so far there have been no land disputes. The informant said that in the process there were compensation activities carried out based on the agreement of both parties so that both the community and the company understood their respective ownership rights.</p> <p>In addition, based on the results of field visits to the company's operational areas, such as Block E29 LTE and Block B64 KM9, it is known that there are no indications of land disputes or other problems. Similar information was also obtained from the results of public consultations with representatives of the Kutai Timur Regency National Land Agency which stated that until now there had been no report or information received regarding a land dispute at PT KPS.</p>		
	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 <p>Based on interviews with the management of the Seleq Sejahtera Bersama cooperative from Miau Baru Village, it is known that the FFB price determination refers to the stipulation from the Kalimantan Timur Province Plantation Agency. Where this information is conveyed by the company via WhatsApp regularly. As an example: Decree on Purchase Price of FFB for Palm Oil Produced by Partners in Kalimantan Timur Province for period II (16 to 31 January 2023 as of 31 January 2023, for KPAS plasma plants the average age is > 10 years with FFB price Rp. 2,401.92/Kg. The unit of certification shows an example of PT KPAS's FFB Purchase Minutes with Seleq Sejahtera Bersama Cooperative Miau Baru Village for the period 1-30 January 2023 with Invoice No. 1470000003 Date 31 January 2023, Quantity 203,110 Kg price 2,401.92/Kg total Rp. 487,853,970. There is evidence of paying for the FFB via bank transfer on February 20, 2023 at the price set by the Kalimantan Timur Provincial Plantation Office. In the payment document there are several payment supporting documents, namely payment invoice documents, tax invoices, minutes of purchasing Cooperative FFB, Management Fee deductions, Monthly FFB Receipt Reports, Daily FFB delivery recapitulation, and purchase price decision letter for palm oil FFB produced by smallholders partners in Kalimantan Timur Province.</p> 5.1.2 <p>Based on interviews with cooperative management from Miau Baru Village and Nehas Liah Bing Village, namely the Seleq Sejahtera Bersama Cooperative and Karya Sejahtera Cooperative, it is known that the FFB price determination refers to the stipulation from the Kalimantan Timur Provincial Labor Agency. This is also in accordance with the results of interviews with the Kutai Timur Regency Plantation Office, that the DSNG oil palm plantation partnership cooperative refers to the prices of the Kalimantan Timur Provincial Plantation Agency which are updated every 2 weeks.</p>		
Decree on Purchase Price of FFB for Palm Oil Produced by Partnered Planters in Kalimantan Timur Province for the period The		

proof of payment for FFB prices according to the price of the Kalimantan Timur Provincial Plantation Office has been explained in indicator 5.1.1.

5.1.3

Based on interviews with cooperative management from Miao Baru Village, namely the Seleq Sejahtera Bersama Cooperative and the Karya Sejahtera Cooperative, it is known that the FFB price determination refers to the stipulation from the Kalimantan Timur Province Pekerabunan Office. This is also in accordance with the results of interviews with the Kutai Timur Regency Plantation Office, that the DSNG oil palm plantation partnership cooperative refers to the prices of the Kalimantan Timur Provincial Plantation Agency which are updated every 2 weeks.

In addition, based on a document review of proof of purchase of FFB from partner plantations, it is known that the entire price of FFB paid is in accordance with the price of the Kalimantan Timur Provincial Plantation Agency.

5.1.4

Based on interviews with cooperative management from Miao Baru Village and Nehas Liah Bing Village, namely the Seleq Sejahtera Bersama Cooperative and the Karya Sejahtera Cooperative, it is known that the cooperatives have understood the contract or Cooperation agreement for the development of plasma plantations with the company and there is no coercion from the company. So far, the cooperation with the company has been going well and the Cooperative has the authority to make decisions. In addition, there are savings funds made by cooperatives and companies to meet replanting needs in the future.

5.1.5

PT KPAS has a farmer partnership program which has been fully managed but has sent its FFB to PT DSN's POM-7. Agreements with smallholders are demonstrated through a Memorandum of Understanding (MoU) as follows:

- Cooperation agreement on the development and management of oil palm plasma plantations in a partnership scheme between PT. KPS with the Karya Sejahtera Cooperative on 24 February 2007. Based on the member meeting of the Karya Sejahtera Cooperative on 9 October 2006 the construction and management of +2,000 Ha plasma plantations of 1,000 plasma members with an area of 2 Ha each plasma located in Miao Baru Village, Kongbeng District, Kutai Timur Regency, Kalimantan Timur Province.
- MoU with Cooperative of Karya Sejahtera from Village of Miao Baru, Sub District of Kongbeng No. 177/KPAS-LGL-JKT/IV/2015 dated 02 April 2015. Total managed area is + 2,000 ha (scope of certification only 800 ha).
- MoU with Cooperative of Karya Sejahtera from Village of Miao Baru, Sub District of Kongbeng No. 269/KPAS-LGL-JKT/VII/2021 dated 01 July 2021. Total managed area is + 2,000 ha (scope of certification only 800 ha).

The company has entered into a contractual agreement between the mill and the smallholders or their appointed representatives and they have understood the contractual agreement. All contractual agreements are fair, legal and transparent and have an agreed time frame. Based on the results of interviews with FFB suppliers, there were no complaints regarding the price of FFB and the FFB payment system.

Based on document verification, it is known that the MoU is in accordance with the provisions as evidenced by the agreement of both parties, has a term of 30 years, all plasma members are able to complete administrative requirements as complete cooperatives with legal entities and administrative completeness of all plasma members, all plasma members are responsible for resolve all disturbances related to land ownership designated for oil palm plasma plantations and this Cooperation has been recognized by the Regional Government. Based on the results of interviews with the chairman of the Karya Sejahtera cooperative and the chairman of Seleq Sejahtera Bersama, it is known that the MoU with the company has been mutually agreed upon between the cooperative and the company as evidenced by having been signed by both parties and known by the Head of the Kutai Timur Regency Plantation Agency.

5.1.6

Based on the Decree on the Determination of the Purchase Price of FFB for Palm Oil Produced by Partners in Kalimantan Timur Province for the second period (16 to 31 January 2023 as of 31 January 2023, for KPAS plasma plants the average age is > 10 years with a FFB price of IDR 2,401.92/Kg).

The unit of certification shows an example of PT KPAS's FFB Purchase Minutes with Seleq Sejahtera Bersama Cooperative

Miau Baru Village for the period 1-30 January 2023 with Invoice No. 1470000003 Date 31 January 2023, Quantity 203,110 Kg price 2,401.92/Kg total Rp. 487,853,970. There is evidence of paying for the FFB via bank transfer on February 20, 2023 at the price set by the Kalimantan Timur Provincial Plantation Office. In the payment document there are several payment supporting documents, namely payment invoice documents, tax invoices, minutes of purchasing Cooperative FFB, Management Fee deductions, Monthly FFB Receipt Reports, Daily FFB delivery recapitulation, and purchase price decision letter for palm oil FFB produced by smallholders partners in Kalimantan Timur Province.

5.1.7

In the previous assessment, there was an OFI regarding the calibration of factory scales, with the support of several official letters, namely a letter from the Office of Industry and Trade of the Kutai Timur Regency Government Number 510/186/INDAG-SEK/IX/2021 dated 24 September 2021 stating that a circular letter from the Regent Samarinda No 440/0407/013.01 on 23 March 2020 concerning precautions to prevent Corona Virus. In addition, there is a letter from the Office of Industry and Trade of the Kutai Timur Regency Number B-510.35/209-Disperindag-PKTN/II/2022 on January 20 2022 which states that the Office of Industry and Trade of the Kutai Timur Regency has not been able to carry out weighbridge measurements because it is still waiting for *Cat Tanda Tera* (CTT).

In this 1.2 assessment, the company has calibrated 2 weighing equipment, with the following results:

1. Certificate of Test Results No. B-510.3/497/Disperindag-Kemtrologian-SERT/II/2023 dated 20 February 2023 from the Head of the Industry and Trade Office Legal Metrology Unit Kab. Kutai Timur, for Electronic Bridge Scales Brand Avery Weight-Tronix/E1205 Serial No. 152650786 Capacity 40,000 Kg Reading Power 10 Kg Class III, PKS 7 Kec. Muara Wahau Kab. Kutai Timur owner of PT. DSN, ST TBO Test Method No. 131/SPK/KEP/10/2015
 - Standard: Weights (Bidur) Class M2
 - Result: Ratified based on RI Law no. 2 of 1981 concerning Legal Metrology
 - Test Date: 8 February 2023 and valid until 7 February 2024
2. Certificate of Test Results No. B-510.3/498/Disperindag-Kemtrologian-SERT/II/2023 dated 20 February 2023 from the Head of the Office of Industry and Trade Legal Metrology Unit Kab. Kutai Timur, for Electronic Bridge Scales Brand Avery Weight-Tronix/E1205 Serial No. 152650786 Capacity 40,000 Kg Reading Power 10 Kg Class III, PKS 7 Kec. Muara Wahau Kab. Kutai Timur owner of PT. DSN, ST TBO Test Method No. 131/SPK/KEP/10/2015
 - Standard: Weights (Bidur) Class M2
 - Result: Ratified based on RI Law no. 2 of 1981 concerning Legal Metrology
 - Test Date: 8 February 2023, valid until 7 February 2024

Based on the description above, it shows that the equipment for weighing has been verified periodically by an independent third party.

5.1.8

The certification unit supports Independent smallholders to take part in RSPO certification, this is evidenced, among other things, by the socialization of the certification program to local farmers, among others, conducted on 19 and 20 April 2022, but up to assessment 1.2 there has been no realization of independent smallholder certification under the supervision of the certification unit. The company gradually certifies all DSNG Partner plantations. For example, in assessment 1.2, scope extension has been carried out for the Seleg Sejahtera Bersama Cooperative farmer group with a cooperation agreement that has been agreed by both parties.

5.1.9

The unit of certification already has a procedure for handling complaints from smallholders/outside which is regulated in the SOP document number SOP-AGR-044-R02 which was ratified by the Managing Director of SBU Agro on October 14 2019 concerning procedures for Communication and Handling of External Complaints. The document explains that Responses to requests for information or complaints must be given immediately, namely no later than 4 working days after a written request for information/complaint is received. Complaints are resolved as quickly as possible, depending on the type of complaint.

Based on a document review of monitoring records of external complaints from 2022 to 2023, there are no records of complaints from external parties that need to be followed up. This is because the certification unit has implemented sustainability policies such as plantation management through best cultivation practices, land tenure processes that prioritize FPIC, environmental

management, social impact management, CSR realization on target, etc. This is in accordance with the results of interviews with the Head of Miau Baru Village and the Head of Nehas Village Liah Bing that the unit of certification has a good relationship with the community around the plantation and there have never been any other negative issues.

Status: Comply

5.2

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

5.2.1

The company has conveyed socialization about the RSPO including improving livelihoods through participation in RSPO certification to smallholders and indirect FFB suppliers on October 20, 2022, at the Miau Baru Village Office. The socialization also covers best management practices and safety aspects such as integrated pest management, land management, no-burning methods, pesticide handling, etc. This activity was attended by 18 people consisting of elements from the village government, representatives of indigenous peoples, representatives of women and youth representatives, cooperatives, PKK and other communities in Miau Baru Village.

The Miau Village women's figure (*BUMDES* Management) has coordinated with interested parties who will proceed in the process of building a discussion forum to exchange ideas so that they can see the root of the problem to see a model or program that is right on target and sustainable. In addition, capacity building will be carried out to increase independence. DSNG wants the activities carried out with planning to be carried out sustainably, but the challenge is that there are not as many CSR personnel as from the program, so it requires the distribution of energy/involvement of the village/traditional community, and this will continue to be reviewed and improved until all the programs that have been planned are realized.

5.2.2

As support for independent smallholders so that their plantations are RSPO certified, the certification unit has facilitated smallholders with some initial training as was held on 19 and 20 October 2022, the training materials provided included: Livelihood Restoration Program (LRP)

1. Indigenous People Program (IPP)
2. Cultural Heritage Program (CHP)
3. Landscape Protection Plan (LPP)
4. Traceability.

Output of this training is the formation of a culture of creativity and motivation in meeting the needs of a decent life. In addition, independent smallholders are aware of existing ancestral cultures, are wiser in making decisions and pay more attention to environmental sustainability.

Based on the description above, it shows that the Unit of Certification has developed and implemented programs to improve livelihoods, including capacity building to increase productivity, quality, organizational and managerial skills.

5.2.3

To ensure the traceability of the FFB received, the unit of certification has carried out traceability documents that aim to obtain some data through visits to FFB supply areas belonging to independent smallholders, collectors (obtained indirectly) and plasma. The data collected is in the form of coordinate points, then spatial checks and overlays are carried out to ensure that the area is within the "APL area". If the FFB source location does not overlap with a conservation area or forest, the FFB supply contract agreement can be continued. Based on this explanation, it can be concluded that the unit of certification has selected the source of FFB by checking the status of land ownership.

5.2.4

As support for independent smallholders so that their plantations are RSPO certified, the certification unit has facilitated smallholders with some initial training as was held on 19 and 20 October 2022 such as pesticide handling and Traceability.

5.2.5

The unit of certification has reviewed and publicly reported on the development of the smallholder support program on a regular basis, including by submitting progress reports on the activities of large private plantations every 3 months. In 2023, the unit of

certification has submitted a report on the progress of private large plantation activities in the first quarter of 2023 with No. Letter 0192/KPS-LGL-JKT/IV/2023 dated 06 April 2023 to the Regent of Kutai Timur and forwarded to the Head of the Plantation Agency Kutai Timur Regency. The report describes company data, legality, development activities, partnerships, community development programs and problems.

In addition, the certification unit reports on investment activities (*LKPM*) for the first quarter of 2023, including providing information related to company data, investment realization and employment.

Based on the description above, it shows that the Unit of Certification has reviewed and publicly reported on the progress of the farmer support program on a regular basis.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1

In the DSN Group Sustainability Policy which was signed by the Chief Executive Officer on 8 July 2021. One of the policies explains non-discrimination such as "No person may experience discrimination in employment, including recruitment, compensation, promotion, training, disciplinary action, termination of work or pension, on the basis of gender, race, religion, age, disability, sexual orientation, gender identity, nationality, political opinion, social group, ethnic origin, reproductive rights or other forms of discrimination."

Based on the interviews, for example with the gender committee obtained that information there are no incidents of discrimination in the company's operational areas and also female workers are given equal rights, wages and opportunities to get promotions with male workers of the same type of work.

6.1.2

Based on the interviews with the manpower agency, gender committee, labor unions, and workers (harvesters and mill operators) at POM 7, Long Teman Estate, and Kemitraan 9 and Kemitraan 7, it is known that there were no foreign workers. They also stated that they have never feel discriminated in the company's any operational 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. There was no difference in the communication between superiors and workers because of the things mentioned above, so the workers did not feel isolated or discriminated against by the superiors. The company also didn't request for any payment during the recruitment process.

6.1.3

During recruitment process, the company had set the standard of competence that required based on the offered position. Selection had included evaluation of skills, performance and medical test result. Furthermore, promotion is conducted based on work period, annual evaluation result and availability of position. All workers are treated equally in accordance with company regulation including rights of the worker as well. Records on manpower procedure had been documented, as verified randomly to the several documents, here as follows:

- Job application letter and its accessories for the Partnership 7 harvest worker with the initials "YD", Medical Check Up results for prospective employees dated May 25 2022, Work Agreement for Unspecified Time No. 014/DWT-KM7/SPK-PKWTT/WHU/VI/2022 dated 30 May 2022 with a probationary period of 3 months which a copy has been received by the employee concerned according to BAST dated 30 May 2022, Employee Evaluation Form dated 31 August 2022 with the result " appointed permanent employees" which is accompanied by Employee Appointment Decree No. 037/DWT/KM-7/SK/WHU/VIII/2022 dated 31 August 2022.
- Job application letter and its accessories for Partnership 7 harvest workers with the initials "OAWN", results of Medical

Check Up of prospective employees dated May 25 2022, Work Agreement for Unspecified Time No. 015/DWT-KM7/SPK-PKWTT/WHU/V/2022 dated 30 May 2022 with a probationary period of 3 months which has received a copy by the employee concerned according to BAST dated 30 May 2022, Employee Evaluation Form dated 1 September 2022 with the result "appointed permanent employees" which is accompanied by Employee Appointment Decree No. 033/DWT/KM-7/SK/WHU/VIII/2022 dated 1 September 2022.

Based on the results of interviews with representatives of trade unions, and the Manpower Agency of Kutai Timur Regency, information was obtained that selection, recruitment, employment, access to training, and promotions in company operations were carried out on the basis of skill, ability, quality, and medical eligibility as required for the job which are available.

6.1.4

Based on the results of interviews with female workers and representatives of the gender committee, information was obtained that pregnancy tests were not carried out as a form of discrimination in the recruitment process. The pregnancy test is carried out to ensure workers who are pregnant do not work handling chemicals. For example: an application for the transfer of the working group of Kemitraan 7 workers with the initials "MB" from the fertilization team to manual care workers according to the results of a pregnancy test on May 17, 2021.

6.1.5

Gender committees had been formed and still active until today in all unit (Estate and Mill) which are chaired by the coordinator along with the head of gender committee. The structure of the gender committee consists of female workers supervised by the male worker as the coordinator. The main objective of forming a gender committee is to provide a forum that can accommodate the aspirations or complaints of workers (especially women).

Based on the interviews with several workers, they also knew of the existence of the gender committee because it had been routinely socialized by the management. Apart from that, workers also conveyed that they more often communicate and discuss with representatives of the gender committee in non-formal conditions to discuss questions or things that are not understood by workers.

6.1.6

Governor of Kalimantan Timur Decree Number 561/K.853/2022 dated December 2, 2022 regarding the Determination of the Minimum Wage for Kutai Timur Regency for 2023 explains, among other things:

- The Minimum Wage for Kutai Timur Regency in 2023 is IDR 3,356,109.27 per month.
- The minimum wage applies to workers/laborers with less than 1 (one) year of service.
- Entrepreneurs are required to compile and implement the structure and scale of wages in the company by taking into account the company's ability and productivity as a guideline for wages for workers/laborers with 1 (one) year of service or more.

The Board of Directors Decree regarding Changes to the Minimum Wage signed by the director on 30 December 2022 came into effect on 1 January 2023 with number 071/DSN/DIR-ALB/JKT/XII/22 (PT Dharma Satya Nusantara), 078/DWT/DIR-ALB/JKT/XII/22 (PT Dewata Sawit Nusantara), and 078/DWT/DIR-ALB/JKT/XII/22 (PT Karya Prima Agro Sejahtera), briefly explained, among others:

- The minimum wage for employees in Kutai Timur Regency, Kalimantan Timur Province is IDR 3,356,150 per month.
- Permanent Employees (SKU) get a supply of rice which is given according to the number of attendance with details: 0.5 Kg/Day (Employees), 0.3 Kg/Day (Wife not working) and 0.25 Kg/Day (maximum dependent of 2 children).
- Freelance Daily Employee wages amounting to Rp. 134,246 per day and do not receive rice supplies.
- Permanent Employees (SKU) who are absent (No Work No Pay), are not paid wages in the amount of IDR 111,872 per day.

Wage Scale Structure as of January 2023

- Group 1 (A-F) The lowest is A1 IDR 3,356,150, - the highest is F30 IDR 4,527,210

- Group 2 (A-F) The lowest is A1 Rp. 3,389,720, - the highest is F30 Rp. 4,766,500
- Group 3 (A-F) The lowest is A1 IDR 3,406,500, - the highest is F30 IDR 4,969,100

For Permanent Employees (SKU) there is no wage scale structure but differentiated through length of service incentives and work attendance incentives as stated in Memorandum No. 023/DIR/JKT/VIII/22 dated 8 August 2022, for example:

Description	Plant ≤ 17 Year	Plant ≥ 18 Year	Criteria
Work Attendance Incentives (IKK)	IDR 170.000	IDR 200.000	100% Attendance without Warning Letter
	IDR 100.000	IDR 130.000	1 day permit / Warning Letter 1
	IDR 50.000	IDR 65.000	Warning Letter 2
	IDR -	IDR -	2 day permit / Warning Letter 3
Tenure Incentives (IMK)	IDR 75.000	IDR 100.000	1 – 3 Years
	IDR 100.000	IDR 120.000	3 – 5 Years
	IDR 120.000	IDR 140.000	5 – 9 Years
	IDR 130.000	IDR 150.000	> 9 Years

The company can show evidence that it has provided equal pay for the same scope of work, for example in maintenance work at KM7 for workers with the same length of service (4 years) at KM7 with the initials "S" and the initials "MB" this is in accordance with the results of interviews with workers with 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

Based on the results of interviews with workers and a review of the labor list documents as of February 2023, it is known that all workers are permanent workers, including workers in the smallholders scheme area. Companies can show documentation of wages and working conditions in accordance with the labor provisions that apply to workers in the national language contained in the Salary Slip document which is given to workers every month.

Based on the results of interviews with workers (harvesters, maintenance and mill operators), information was obtained that workers had understood the wage information provided by the company and so far there had been no complaints regarding the wages paid.

6.2.2

The company has company regulation period 2022 to 2024 provided in *Bahasa* that explains the working conditions and rights / obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, working hours, remuneration, discipline, deduction, overtime, sick leaves, holiday entitlement, maternity leave, and other provisions. These all stated in each worker's work agreement. Explanations related to the contents of the company regulation, including:

- Article 6 concerning working time which explains that there are 2 types of working time in the company, namely by working 8 hours per day or 5 working days in a week (head office) and 7 hours per day or 6 working days in a week (palm oil estate and mill), in which the total working hours are 40 hours in a week.
- Article 13 concerning wages which explains that the lowest wage of worker couldn't be lower than the minimum wage set by the government every year.

Company regulations have been ratified by Decree of the Office of Manpower and Transmigration of the Province of Kalimantan Timur April 18, 2022.

Based on the results of interviews with workers both at the Mill and Estate (Harvesters, Maintenance and Mill Operators), it was conveyed that the workers had received a copy of the work agreement signed by the workers and company representatives. For example, the Letter of Agreement for an Unspecified Time No. 014/DWT-KM7/SPK-PKWTT/WHU/V/2022 dated 30 May 2022 which provides detailed information on wages and working conditions (for example: regular working hours, deductions, overtime, sick leave, right to holidays (leave), maternity breaks, reasons for dismissal, notification period before dismissal, etc. according to national regulations), the document has been received by the employee concerned on May 30, 2022 according to the BAST documentation shown.

In addition, companies can also show detailed salary documentation that provides accurate information regarding compensation for work performed as described in indicator 6.2.1.

6.2.3

Overtime

Results of interviews and verification of overtime documentation of 3 security workers at PKS 7 ("SS" NIK 0048131, "WU" NIK 0049034 and RAS "NIK 0089895) and 2 Engine Room operators at PKS 7 ("A" NIK 0045921 and "MU" NIK 0070082), obtained information including:

- Overtime has been carried out without coercion and with an agreement between the worker and the company which can be proven through an overtime order document, for example an Engine Room worker's Overtime Order with the initials "MU" dated January 17, 2023 with a planned overtime of 1 hour.
- The calculation of overtime pay is in accordance with the relevant labor regulations.
- The total hours of overtime each week excluding overtime on holidays does not exceed 4 hours per day or 18 hours per week.

Annual Leave

- PKS 7 employee leave/permit application form with the initials "YLB" NIK 0015840 dated January 6, 2023 with the number of days of leave requested being 3 days (2 days annual leave and 1 day death permit).

Days Off

Based on the results of interviews with workers at both the Mill and Estate, information was obtained that workers are entitled to 1 day off every week.

Maternity Leave

- Application form for maternity leave for KM7 care workers with the initials "MB" NIK 0058731 dated 22 December 2021 with maternity leave from 25 December 2021 to 24 March 2022 (90 Days).
- Application form for maternity leave for KM7 care workers with the initials "S" NIK 0059908 dated 29 May 2021 with maternity leave from 31 May 2021 to 28 August 2021 (90 Days).

6.2.4

Based on the results of field observations it is known that the company has provided several facilities and infrastructure for employee welfare, such as:

- Housing area including sanitation facilities
- House of worship
- Clinic
- school bus
- Sports fields
- Landfill.
- Clean water
- Child Care Center (BPA)

- electricity and so on.

In general, the facilities provided by the certification unit are in good condition and sufficient quantities related to the number of workers in each unit. Based on field observation, all housing has well-maintained drainage. The company has also conducted monitoring for the condition of the feasibility of the facilities provided every year, such as housing which repaired if there were damage (usually if there were any damage, the worker will inform it and it will be handled directly by the company).

6.2.5

The company has provided accessible food sources by providing small cafeteria in the workers' area for lunch. Based on interviews with workers (harvesters and mill operators), labor unions and gender committees, it's known that workers have no difficulty in getting food sources because the company has provided cooperatives that sell daily necessities. In addition, workers can buy these needs to the markets around the company's area without any difficulties.

Based on the field observation in housing areas of each unit, it's known that there were also workers who open small business stalls to sell daily necessities in each housing.

6.2.6

The certification unit has calculated the prevailing wages and in-kind benefits based on the guidelines issued by the RSPO. Prevailing wages are taken from prevailing wages such as basic wages/minimum wages. Meanwhile, in-kind benefits are taken from all costs incurred by the certification unit for the provision and maintenance of facilities provided by the certification unit to employees, such as electricity, housing, water, schools, health facilities, and baby care that has been calculated based on actual and rational price at certification unit location. The amount of prevailing wages and in-kind benefits that each worker gets per month IDR 8,756,910 to IDR 9,218,728.

6.2.7

During the assessment, there were no workers with contract status/daily workers. The all-current employee status are permanent workers.

Status: Comply

6.3

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

6.3.1

The Company had a policy concerning on the freedom of association (No. 0014/HCO/M/V/2016) validated on 12 May 2016. This policy applies to all operational areas of DSN Group. It stated that the group respects workers' rights to freedom of association and association with other individuals and collectively expresses, encourages, pursues, and defends the common interest. The policy was published in *Bahasa* which can be understood by all employees.

As a form of implementation, the company can show documents ratifying the labor union including:

- Proof of Registration of PT Dharma Satya Nusantara Muara Wahau Workers' Union No. B-568.9/1783/Disnakertrans-HIJ/XII/2022 dated 14 December 2022.
- Proof of Registration of PT Dewata Sawit Nusantara Workers' Union No. B-568.9/194/Disnakertrans-HIJ/II/2023 dated 9 January 2023.
- Proof of Registration of PT Karya Prima Agro Sejahtera Workers' Union No. B-568.9/382/DISNAKERTRANS-HIJ/II/2022 dated 15 February 2022.

6.3.2

The company also shows documents of internal labor union meetings and bipartite meetings, for example the Minutes of Meetings January 21, 2023 which was attended by representatives of the PKS-7 workers' union and company representatives

who discussed, among others:

- Realization of cleanliness of housing and factories every Friday morning routinely.
- Holding joint activities on national Labor Day.
- Competition activities to commemorate Indonesia's Independence Day.
- Iftar Together in the month of Ramadan with PT KPAS
- Labor union member recruitment updates

6.3.3

The results of interviews with labor union representatives, obtained information that the company has facilitated workers in forming trade unions by providing facilities in the form of meeting rooms and not intervening in labor union activities. The results of interviews with workers at Mill and Estate (harvesting, spraying, and processing), obtained information that the company has provided freedom of association and that union membership is voluntary.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1; 6.4.2; 6.4.3; 6.4.4

The Company had a policy concerning on children/underage worker protection (No. 055/DIR/XII/2016) validated on 1 December 2021. This policy applies to all operational areas of DSN Group. It stated that the group prohibited to recruit employees under the age of 18 years old and prohibited the workers to bring children along in doing work (moreover to help the workers doing their work). The Company also showed the statement letter signed by Human Capital Section Head of PT. DSN which stated that they do not employ under-age worker.

Based on the results of a review of the labor list document as of March 2023 and interviews with the Kutai Timur Regency Manpower Office, information was obtained that there were no workers under the age of 18 at this time or when the workers were hired.

As an effort to socialize this policy, the company has posted a warning regarding the prohibition of using underage workers in a number of locations that are easily visible and includes it in the clauses of cooperation agreements with suppliers and contractors, which has also been understood by the parties who work with the company.

Status: Comply

6.5

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

6.5.1; 6.5.2

The Company had a policy concerning on reproductive rights (Internal memo No. 0011/HCO/M/III/2016) and the prevention of sexual harassment and violence (No. SOP-AGR-049-R01). Each policy applies to all operational areas of DSN Group. The documents stated generally as follows:

- The company would assign pregnant and breastfeeding workers in no danger work (away from chemical contacts).
- The company would guarantee that pregnant workers did not having contacts with chemical stuff by doing pregnancy test once a month.
- The company would provide certain place for breastfeeding.
- Every worker is entitled to receive protection against sexual harassment in the workplace and if convicted of sexual abuse, there will be penalized in accordance with applicable regulations.

Based on the results of interviews with representatives of the gender committee and women workers, information was obtained that workers already had knowledge regarding policies on protecting reproductive rights, preventing sexual harassment and violence. Then, it was also conveyed that women workers have been given reproductive rights such as the right to rest during menstruation and the right to breastfeed their children. In addition, so far there has never been an incident of sexual violence or harassment in the company's operational area.

6.5.3

Based on the results of field observations, it is known that the company has fulfilled the needs needed by mothers who have just given birth, such as: a place to breastfeed and time to breastfeed their child, clinical facilities with competent medical personnel. The identification of the needs of mothers who have just given birth is carried out during routine pregnancy checks, so that the facilities provided by the company involve the involvement of the workers concerned for their opinions.

6.5.4

The Company showed the procedure to accommodate complaints and grievance from employees specifically in sexual harassment and violence (No. SOP-AGR-049-R01). In the procedure described that if requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower). The company also provided whistleblowing by email, company website, and letter to complaint reporting unit for any confidentiality grievance.

Based on the interviews with workers it's known that the workers already have sufficient understanding of the grievance mechanism. Related complaints of sexual harassment (women's issues) can be submitted to the gender committee. In the last year period, there was no complaint related to sexual harassment, violence at work/reproductive rights.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1

The Company had a policy concerning on force-labor and stated in company guidance (No. PDM-AGR-R06) validated on 1 January 2020. This policy applies to all operational areas of DSN Group. The policy stated that the company respecting human rights by referring to the Declaration United Nations concerning on human rights and respecting employee rights such as the elimination of discrimination, the prohibition of forced and child labor, fair wage provisions, upholding the principle of gender equality in accordance with legal norms, and respecting the freedom of labor union.

The Company also showed the SOP of recruitment (No. SOP-AGR-012-R03) validated on 1 December 2019 which informed that workers do not take any recruitment fees at any stage of the recruitment process, and no retention of passports/identity documents. The Company then showed that on each work agreement between the certification unit and the contractor/supplier, there were clauses related to fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the contractors.

Based on the results of interviews with representatives of trade unions and workers at both the Mill and Estate, it was stated that so far there have been no complaints regarding the application of the forced labor system and each job is carried out based on the agreement contained in the employment agreement between the worker and the company.

6.6.2

Based on documents review and interviews with the manpower agency, gender committee, labor union, and workers at POM 7, Long Teman Estate, and Kemitraan 9 Estate, it's known that there were no contract workers and migrant worker in all units.

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 shown evidence that it has an OHS person in charge that is included in the OHS Committee structure, including:

- Decree of the Head of the Office of Manpower and Transmigration of Kalimantan Timur Province No. 500.15.18.5/530/P2K3/PPK/DTKT/II/2023 dated 2 February 2023 concerning Ratification of the OHS Committee of PT Dharma Satya Nusantara PKS 7 with a secretary named Toni Hendrike (Decree of Appointment No. 5/13061/AS.01.03/IX/2022 on 21 September 2022 valid for 3 years).
- Decree of the Head of the Office of Manpower and Transmigration of Kalimantan Timur Province No.

500.15.18.5/528/P2K3/PPK/DTKT/II/2023 dated February 2, 2023 concerning Ratification of the OHS Committee of PT Karya Prima Agro Sejahtera with a secretary named Faisal where the Decree on the Appointment of OHS Expert is being managed by the OHS Service Company.

- Decree of the Head of the Office of Manpower and Transmigration of Kalimantan Timur Province No. Kep.566/620/P2K3/PPK/DTKT/2021 dated 13 April 2021 concerning Ratification of the OHS Committee of PT Dewata Sawit Nusantara with a secretary named Moh. Mishbahul Anam MS (Decree of Appointment No. 5/18724/AS.02.04/XII/2021 dated 31 December 2021 valid for 3 years).

As for any issues related to OHS that have arisen, they have been discussed in periodic meetings that are held every 1 month. For example the OHS Committee meeting which was held on January 11 2023 in LTE Meeting Room discussed work accidents for the December 2022 period, administering booster vaccines for employees, cleaning the housing environment, etc.

6.7.2

The emergency response procedure has been contained in the Non Karhutla Emergency Response SOP document No. SOP-AGR-103-R00 dated 1 December 2021 which describes the types of emergencies (fires, explosions, pollution, earthquakes, floods, landslides, riots and other conditions) and procedures for handling them.

In addition, based on the results of field observations at both the Mill and Estate, it is known that the company has provided first aid kits such as first aid kits for the building and first aid bags brought by the foreman to handle first aid in the field. Then, information was also obtained that the personnel in charge of carrying first aid kits had an understanding of first aid procedures and that the equipment was in complete and sufficient condition to cover the number of workers available.

The company has also provided warnings of evacuation routes and assembly points in places that are easily visible and understood by workers.

6.7.3

The company shows the PPE procedure document contained in the SOP-AGR-072-R00 document regarding the use of employee personal protective equipment, issued on September 1, 2016. The document regulates, among other things:

- PPE belongs to the company and is lent by the company to employees or other people at work.
- PPE that is damaged or used up, the replacement terms are decided by the head of the local work unit.
- PPE maintenance is the responsibility of the user concerned.
- The frequency of PPE replacement is regulated by the local Mill Head or on the recommendation of the SHE Department Head of PT DSN with the approval of the Operation Director.
- For employees who have been given and are required to wear PPE, but do not use it while doing work at work, a warning letter will be issued in accordance with company regulations or other forms of sanction that have been regulated.
- The types and specifications of PPE that are appropriate, appropriate and meet OHS standards are carried out based on the results of the Hazard Identification and Risk Assessment or job safety analysis.
- At the time of handover of PPE, socialization should be carried out regarding how to use and the benefits of the PPE.
- The environmental OHS assistant evaluates the suitability, comfort, and discipline of using PPE. The results of the evaluation are used as input in setting the next PPE standard.
- The SHE Department and Mill operations jointly discuss setting PPE standards (if changes are to be made). Furthermore, the new standard is communicated with the Procurement Department.

Based on the results of field observations and interviews with workers both at the Mill and Estate, information was obtained that workers had used PPE that was adequate and in accordance with hazard identification and risk control according to their work area which was provided free of charge by the company. In addition, it was also conveyed that the replacement of PPE is carried out if the PPE no longer provides maximum protection.

In addition, the company has provided a Safety Data Sheet that is placed in a visible and easily accessible position, and adequate sanitation facilities are available for workers to use to clean themselves and store work equipment related to chemicals. The

company has waste water trap from sanitation facilities to avoid the environment pollution.

6.7.4

Companies can show recorded proof of payment via bank transfer as well as a list of social security program participants (BPJS Health and BPJS Employment), for example the details for March 2023 are as follows:

Unit	Description	Number of Worker
PKS 7	Number of Worker on March 2023	103
	Number of Participant BPJS Employment on March 2023	95
	Number of Participant BPJS Health on March 2023	95
LTE	Number of Worker on March 2023	91
	Number of Participant BPJS Employment on March 2023	87
	Number of Participant BPJS Health on March 2023	87
KM 7	Number of Worker on March 2023	27
	Number of Participant BPJS Employment on March 2023	27
	Number of Participant BPJS Health on March 2023	74
KM 9	Number of Worker on March 2023	310
	Number of Participant BPJS Employment on March 2023	304
	Number of Participant BPJS Health on March 2023	304

Based on the data in the table above, it is known that there is a difference between the number of participants in the *BPJS* Health and *BPJS* Employment program and the number of workers, this is because there are workers whose *BPJS* payments are made by the Head Office.

Based on the results of interviews with workers at both Mill and Estate, information was obtained that workers had an understanding regarding *BPJS* membership, besides that the company already has clinical facilities which are first-level health facilities as treatment referrals where all employees are free of charge.

6.7.5

Work accidents have been recorded by the company using a Lost Time Accident (LTA) which is reported periodically through the OHS Committee Report for each Estate and Mill unit. For example LTA PT KPAS in 2022 as follows:

- Work Hour: 1,824,677
- Lost Time Incident: 0
- Lost Time: 0
- FR: 0
- SR: 0

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

Based on document verification and interviews during the field audit, it is known that there has been no revision of the IPM Control Work Instructions. The company is still using IK-AGR-OLP-13-R00 regarding OPT Early Detection and IK-AGR-OLP-14-R00 regarding Disease Control. The procedure for developing an early warning system is routine enumeration of potential

pests and diseases, with an emphasis on mechanical and biological control, such as planting beneficial plants (*Turnera subulata* and *Antigonon leptopus*) to anticipate caterpillars, as well as installation and monitoring of BOB (Barn Owl Box) to anticipate mouse attack. The procedure also establishes an economic threshold for each pest and disease, that chemical control is only carried out if the attack is above the economic threshold.

A census of plant pests and diseases is carried out once a month, for example in the pest and disease census for the 2022 period it was found that caterpillars that eat oil palm leaves and rats were found but were still below the threshold. This is also influenced by the implementation of beneficial plants which aim to host predatory caterpillars that eat oil palm leaves and the implementation of owls as rat predators.

7.1.2

The company does not use the species mentioned in Permen LHK No. P.94/MENLHK/SEKJEN/KUM.1/12/2016 concerning Invasive Types, for example as shown in the Monitoring of Beneficial Plant Planting document with the types *Antigonon* and *Turnera* aimed at overcoming caterpillar attacks.

7.1.3

The company shows procedures related to technical control of pests and diseases contained in IK No. IK-AGR-OLP-14-R02 which was published on July 1 2015 which explains that the method of controlling pests and plant diseases uses ecological, biological, physical and chemical approaches and does not use fire in their control.

Based on field visits to block C09 KM7, no pest control using fire was found and interviews with workers, it was also conveyed that control was carried out biologically and chemically.

Status: Comply

7.2

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

7.2.1

The company has a pesticide application procedure which is presented in the document:

- Work Instruction No. IK-AGR-OLP-15-R02 dated November 3, 2014 regarding weed management in Mature and Immature areas,
- Work Instruction No. IK-AGR-OLP-16-R02 dated September 28th 2015 regarding pesticide dosage and applicator considerations
- Work Instruction No. IK-AGR-OLP-17-R01 dated February 1, 2012 regarding the handling of pesticides.
- Internal Correspondence no 0091/OPS/XXI/2012 from Region Kaltim Head 1 & 2 to all Plantation Heads and Estate Heads on November 30, 2012 regarding the use of paraquat chemicals which were eliminated per year 2013.

The Department of Agronomy Support has confirmed the pesticides to be used annually. Herbicides on LTE and KM9 in 2022. One of the methods used in justifying pesticides is by referring to the green book on permitted pesticides published by the Ministry of Agriculture and the www.pestisida.co.id. Pesticide trials are carried out for new types and labels on the first use of pesticides.

In the use of pesticides, not all areas are sprayed with pesticides, but the areas that are sprayed are circle, path and collection point. To determine the need for spray volume per hectare, the company calibrates the spray equipment, nozzles, and road speed so that the dosage and volume of the spray solution is correct and not excessive. The company has determined the pesticides used for weed control, for example the Glyphosate to control *Imperrata Cylindrica*, and *Mikania Micrantha*, and the *Methyl Metsulfuron* to control *Imperrata Cylindrica*, *Caladium*, *Mucuna* and others weeds.

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

Based on field observations, the company has used pesticides in accordance with the SOP.

7.2.2

Unit certificate shows the results of monitoring or recording usage records for all pesticides used in LTE, KM7 and KM9 Estate for the period January 01 – December 31, 2022 (including active ingredients used and LD50 dose, area of pesticide use, amount

of active ingredient used). Used per hectare, and the amount of active ingredient used per hectare). For example, the pesticides used, such as Kleen up 480 with the active ingredient isopropyl amine glyphosate, have an LD 50 of 3,715 mg/kg; application area of 4.022 ha; with active ingredients per area of 0.419 liters/ha.

7.2.3

The company shows records of pesticide use from 2019 – 2022. The company no longer uses pesticides with the active ingredient paraquat, with a memorandum on the prohibition of the use of paraquat number 001/S&I/2020 since January 14, 2020, to minimize the use of pesticides in the context of implementing IPM, in this case the company uses natural predators such as owls (*Tyto alba*) to control rat pests. The company shows monitoring of gupon checks in KM9, KM7 and LTE which explains 33 gupon locations in the KM 9 Estate area with a total of 800 and 22 locations in the LTE area with a total of 431. From the monitoring results from October 2022, it shows an active owl nest.

The company already has an IPM plan so that the use of pesticides has been minimized, including the company prioritizing selective pesticide products and application methods. To find out the need for spray volume per hectare, the company calibrates the sprayer, nozzle, and road speed so that the dosage and volume of the spray solution is correct and not excessive. To suppress weed growth, the company developed the *Mucuna Brachteata*.

The company also prioritizes biological methods in controlling plant pests, namely through the development of Beneficial Plants *Turnera Subulata* and *Antigonon leptopus* and natural predators of rats, namely *Tyto Alba*.

7.2.4

The results of document verification, field observations and interviews with operational employees revealed that the Company no longer uses pesticides with the active ingredient paraquat, with a memorandum on the prohibition of the use of paraquat numbered 001/S&I/2020 since January 14, 2020, to minimize the use of pesticides in the context of implementing IPM, in this case the company uses natural predators such as owls (*Tyto alba*) to control rat pests. The company shows monitoring of gupon checks in KM9, KM7 and LTE which explains 33 gupon locations in the KM 9 Estate area with a total of 800 and 22 locations in the LTE area with a total of 431. From the monitoring results from October 2022, it shows an active owl nest.

7.2.5

Based on the review of the pesticide use document in 2022, it is known that the active ingredients of the pesticides used are methyl metsulfuron, glyphosate, fluroxipir, and triclopyr which are identified in WHO pesticides class U, class II, and class III. During inspections to company facilities, pesticides are stored in permanent warehouses equipped with emergency response facilities, such as: fire extinguishers, first aid kits. The pesticide storage area is a locked area with limited access. Ventilated storage via cross-flow ventilation. MSDS and hazard symbol labels are provided near pesticides. Emergency showers and eye washers are also provided to anticipate chemical handling emergencies. The chemical handling PPE provided includes boots, aprons, safety glasses, respiratory masks, and gloves. The possible spill has been managed. The pesticide container quantity record is clearly visible. Liquid waste from pesticides is reused for subsequent spraying applications. There are also some used jerry cans which can be reused for field applications.

7.2.6

The company has a Pesticide Handling Work Instruction (which is an elaboration of the SOP) number IK-AGR-OLP-17-R01. Effective from February 1, 2012 and approved by the Divisions Head. Training and socialization of work instructions including the risks and impacts of pesticide application have been carried out by the organization on a regular basis. Based on field observations and interviews with pesticide applicators during spraying activities, that the company always provides training on the use and handling of pesticides at work, workers can also explain if after spraying, PPE and work tools are cleaned in the wash house and dried/ stored there. The results of the Observation of the Wash House facility in the Estate, it is known that the Wash House has been functioning properly. The company also carries out a risk analysis in applying pesticides and considerations on product labels at HIRAC 2022 – 2023. Including the application of spray PPE according to the MSDS, namely masks, face shields, rubber gloves, aprons, boots and the foreman (Supervisor) as the person in charge of checking usage appropriate PPE by workers.

Based on the results of interviews with spray workers at KM9 and LTE it is known that workers understand the use of pesticides according to the MSDS and all workers use PPE according to occupational hazards and risks. In addition, the company has provided appropriate and usable PPE, and PPE can be easily replaced if damaged.

7.2.7

During inspections to company facilities, pesticides are stored in permanent warehouses equipped with emergency response facilities, such as: fire extinguishers, first aid kits. The pesticide storage area is a locked area with limited access. Ventilated storage via cross-flow ventilation. MSDS and hazard symbol labels are provided near pesticides with the caption 'Hazardous and Toxic Substances in the Herbicide Warehouse'. Emergency showers and eye washers are also provided to anticipate chemical handling emergencies. The chemical handling PPE provided includes boots, aprons, safety glasses, respiratory masks, and gloves. The possible spill has been managed. The pesticide container quantity record is clearly visible. Liquid waste from pesticides is reused for subsequent spraying applications. There are also some used jerry cans which can be reused for field applications.

7.2.8

Based on observations at the pesticide warehouse, Temporary Storage Toxic and Hazardous Materials Waste, interviews with warehouse staff and pesticide applicators at LTE and Kemitraan 9 Estate, it is known that all pesticide containers were sent to the Pesticide Warehouse and Temporary Storage Toxic and Hazardous Materials Waste. Based on field observations at LTE housing, Kemitraan 7 Estate and Kemitraan 9 Estate, no irresponsible management of used pesticide containers was found. Management is carried out in accordance with applicable regulations, namely after being collected at a licensed Temporary Storage Toxic and Hazardous Materials Waste, it will be transported by a licensed transporter. The last transportation was carried out on January 4 2023 by the Toxic and Hazardous Materials Waste carrier vendor, namely PT. Sumber Rezeki Abadi Jaya. Here are some examples of Toxic and Hazardous Materials Waste manifest data:

- KLHK-1684310762: 0.0129 tons of used filter from pollution control facility
- KLHK-1684311235: 0.6166 tons of used lubricating oil
- KLHK-1684290881: 0.009 Tons of Used *Majun* Cloth
- KLHK-1684310952: 0.1727 tons of used Toxic and Hazardous Materials packaging

Based on the description above, it shows that all containers of pesticides produced are managed according to applicable regulations and/or instructions on the packaging.

7.2.9

Based on interviews with company representatives, they also explained that airborne pesticides were not applied. Pesticide application using a sprayer, according to the results of the pest and disease census. The results of field observations did not find the application of pesticides through the air.

7.2.10

Based on the review of the latest cholinesterase inspection document, the pesticide handling workers carried out in January 2023, were not found to be below the normal threshold. Based on interviews with workers in the field, it is known that they have carried out health checks.

7.2.11

The company presented memorandum No. 0011/HCO/M/III/2016 dated March 14, 2016 regarding pregnant and lactating workers. The memo states that the company places female workers who are pregnant or breastfeeding their babies up to the age of 9 months, in areas that do not endanger the health of the mother and baby. It is forbidden to work on work related to chemicals (chemicals).

Based on a field visit to KM9 block B59 for spray workers, all of whom are women, it is known that none of the workers are pregnant, and the workers already know about policies for pregnant or lactating workers, such as for pregnancy check-ups where only women who do not use contraception and done once a month.

Status: Comply

7.3

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

7.3.1

The company has identified the waste resulting from operational activities contained in the Document Identification of Types of

Waste for Estate and POM 7. The identification is grouped based on activities that generate waste, waste name, waste code, type of solid or liquid, and its management. Determination and classification of waste codes uses reference to Government Regulation number 101 of 2014. The company also has several procedures related to waste management and utilization, procedure number SOP-AGR-035-R04 which was approved by the Managing Director of SBU Agro on November 25th, 2022.

In the realization of waste management, it is divided into several types based on the characteristics of the waste it produces, including:

Hazardous and Toxic Waste

In managing hazardous and toxic waste, the company does not reuse it but only temporarily stores it located at LTE and Estate Partnership 9. The company already has a licensed hazardous waste storage area, namely the Temporary Storage Permit for Hazardous and Toxic Waste for PT KPS unit 7 Mill based on the Decree of the Kutai Timur Regent Number 660/26/DLH/VIII/2017 dated 26 April 2021 and is valid for 5 years, namely 25 April 2026.

The hazardous waste stored at 7 Mill's Storage Temporary Toxic and Hazardous Materials is transported by a licensed party once a year. The last transportation was proven through the Electronic Manifest document and the minutes of transportation which were carried out on January 4, 2023 by PT Sumber Rejeki Abadi which is a licensed party. The company can show a cooperation agreement with the carrier, namely based on the Cooperation Agreement Letter document between the certification unit (PT. KPS) and PT Sumber Rezeki Abadi Jaya with cooperation agreement No. 008/KPS/JKT/2022 dated January 3, 2022 with a validity period of up to December 31, 2023. For PT DSN in collaboration with a licensed hazardous waste carrier, namely PT Sinar Bintang Akbar with cooperation agreement Number 298/DSN/JKT/2022 on April 20th, 2022 with validity period until December 31st, 2023. The company can also show the legality documents of the carrier such as a valid transportation permit from the Ministry of Environment and Forestry, a valid permit for special goods transportation from the Ministry of Transportation, as well as a Cooperation Agreement between the carrier and the processor and/or beneficiary licensed.

Companies can also show documents for storing and handling hazardous waste in accordance with their SOPs and Government Regulation Number 101 of 2014. These documents include manifests, balance sheets and logbooks. Based on the results of a document review by comparing the manifest, balance sheet and logbook, it can be seen that the waste data transported on January 4, 2023 is in accordance with the data recorded in the balance sheet and logbook for the period before transportation was carried out. The company records all waste entering and leaving the storage warehouse properly so that waste management data can be tracked easily and there are no differences in recording.

The results of a field visit to the hazardous waste storage warehouse at LTE and Kemitraan 9 Estate show that the company has managed the hazardous waste quite well. All obligations stated in the waste storage permit have been fulfilled, such as the availability of fire extinguishers, showers, eyewash, coordinates, alarms, first aid kits, oil traps and appropriate labeling. In addition to adequate lighting and air ventilation, the company also has drainage channels on the outside of the warehouse to anticipate pollution to the surrounding environment. The results of interviews with the warehouse manager also show that the manager has fully understood the SOP for hazardous waste management and mitigation measures in the event of potential pollution. The company has also reported the results of hazardous waste management which is carried out every quarter with proof of Reporting Documents of the PT KPS Unit 7 Mill Hazardous Waste Management Report for the fourth quarter of 2022 which was reported to the Kalimantan Timur Provincial Environmental Service on January 26 2023 and to the Ministry of Environment and Forestry on April 14th, 2023 with proof of ID TTE 1681428005-3526.

Non-Hazardous and Toxic Waste

Non-hazardous waste such as domestic waste and used fertilizer sacks are managed in the form of reuse for goods that can still be used. In addition, waste that cannot be reused will be collected, if it still has economic value, such as scrap metal and used tires, it will be sold to those who work with the company. Non-hazardous waste that cannot be reused will be disposed of in landfills. Transportation of non-hazardous waste from employee housing or the emplacement area is immediately disposed of in the landfill, and when the landfill is full, stockpiling and installation of signboards marking the opening and closing dates will be carried out.

On field observations in the emplacement area showed that there were no traces of burning, all domestic waste was disposed

of in waste storage tanks spread throughout the building. The results of interviews with residents of the settlement also stated that the company routinely conducts outreach regarding domestic waste management, both directly through meetings, and indirectly by installing signboards prohibiting burning waste and littering.

Liquid, Solid and Water Waste

Solid waste from the FFB processing process in the form of empty fruit bunches, shells and fiber is reused by the company as a substitute for fossil fuels (diesel) for electricity generation in boilers. Solid waste utilization data is explained in more detail in indicator 7.9.1.

The company has utilized POME by applying it to Land Applications. Related to regulation and management of POME is explained in more detail in indicator 7.8.3.

7.3.2

Based on interviews with Kemitraan 9 Estate and Warehouse LTE Managers, it is known that they understand the handling of waste disposal, especially hazardous waste and domestic waste and their management as regulated in the procedures owned by the company. Warehouse managers can also explain techniques related to waste management, such as the treatment of incoming and outgoing goods, recording and reporting, transportation periods, handling in the event of an emergency and other actions regulated in company procedures. The verification results of the hazardous waste Logbook document also show that all incoming and outgoing waste has been properly documented and in accordance with the actual conditions. All hazardous waste generated in each division will be sent to the hazardous waste warehouse in a maximum of 1 week from the date the waste is generated, previously stored in a special room available in each division office.

Based on interviews with workers in the emplacement area stated that the waste management carried out by the company was very good and organized. Trash bins are properly provided, all waste disposal facilities have also been provided by the company such as organic and non-organic waste bins which will be replaced if damaged, hazardous waste warehouses and landfills. Employees in housing also understand very well how to separate the types of waste they produce and which types of waste cannot be reused. This understanding of waste management is the result of regular and consistent socialization and training as evidenced by the minutes of events conducted on 22 September 2022, 27 October 2022 and 25 October 2022 to 60 staff and employees at LTE, Kemitraan 7 Estate and Kemitraan 9 Estate.

7.3.3

The company does not burning for waste destruction, this can be proven from field observations in the LTE housing area, Factory Housing 7, Kemitraan 7 Estate and Kemitraan 9 Estate where no traces of burnt waste were found. Based on interviews with employees stated that they had never burned garbage, because they knew the prohibition of burning and the sanctions they would receive if they did. Residential waste is disposed of in the bins provided and then transported to landfills and buried when they are full. The results of field observations in the housing area of LTE employees, Factory Housing 7, Kemitraan 7 Estate and Kemitraan 9 Estate also show many warnings to prohibit burning waste and the dangers that can arise from burning. Interviews with workers in LTE housing, Factory 7 Housing, Kemitraan 7 Estate and Kemitraan 9 Estate explained that all workers had understood the regulations regarding the prohibition of arson and strict action would be taken if they committed a violation.

Status: Comply

7.4

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

7.4.1

The company has Work Instructions in managing soil fertility which are described in:

- IK-AGR-OLP-09-R03 dated November 3, 2014 regarding fertilization
- IK-AGR-OLP-10-R02 October 2014 regarding POME applications in the field
- IK-AGR-OLP-11-R02 dated November 3, 2014 regarding the EFB application
- IK-AGR-OLP-25-R01) dated February 1, 2014. About soil and leaf sampling

These procedures define multiple strategies to maintain and improve long-term fertility, combining efficient and scalable organic fertilization, taking into account the age of the oil palm and soil nutrients by conducting leaf and soil sampling.

7.4.2

The company routinely conducts regular soil and leaf analysis, routine soil analysis is carried out every 6 years by measuring the following parameters: texture, acidity (pH), content of C, N, P, K, Mg, Ca, Na, BS, CEC, Al and H. And for Leaf Analysis every year to monitor and manage plant health by testing and certificates, as follows:

- Test Result Report by the Central Plantation Service Laboratory of PT. Central Alam Resources Lestari with number 10/KPS-KM/RA/IV/2022 dated 27 April 2022 with 15 samples for LTE – PT. KPAS.
- Certificate of Plant Tissue Testing (Leaf) with the number 0683/CPS/IV/2022 dated 27 April 2022 with a total sample of 15
- Test Result Report by the Central Plantation Service Laboratory of PT. Central Alam Resources Lestari with number 16/KPS-KM9/RA/IV/2022 dated 30 May 2022 with 7 samples for KM9 – PT. KPAS.
- Certificate of Plant Tissue Testing (Leaves) with the number 0777/CPS/V/2022 dated 30 May 2022 with a total sample of 7.
- Test Result Report by the Central Plantation Service Laboratory of PT. Central Alam Resources Lestari with number 15/KPS-LTE/RA/IV/2022 dated 30 May 2022 with 5 samples for LTE – PT. KPAS.
- Certificate of Plant Tissue Testing (Leaves) with the number 0777/CPS/V/2022 dated 30 May 2022 with a total sample of 5.

7.4.3

Efficient and moderate inorganic fertilization is very important to maintain soil structure and texture, combined with fertilization with POME land application and EFB mulch application. Fertilization is carried out mainly on land with low nutrient properties, to improve soil structure and texture, and minimize inorganic fertilization if possible. No replanting activities have yet been carried out, but procedures stipulate that the biomass in replanting will return to the soil for the nutrient cycling strategy. For example, a by-product application is presented.

The company shows that the application for jankos until period 2022 with a total of 42,300 MT and POME 245.703,16 MT. Based on field observations in, it is known that the EFB application is carried out by forming the letter U around the palm and has applied POME and nothing flows into the environment.

7.4.4

Based on document review and interviews, it is known that the company has fertilizer recommendations for 2022. In the records of fertilization records for 2022 at LTE it is known that it is 100% known that the fertilizer recommendations have been realized by the company, although in the third round such as Dolomite fertilizer for 101 ha have been realized. Changes in dosage were made on the advice of the Research department.

The company has applied fertilization based on the recommendations from the Department of Agronomy. The company also has records of fertilizer in 2022, including NPK 13/6/27/4+0.65B 192,725 MT, Rock Phosphate 17,521 MT and Dolomite 29,782 MT.

Status: Comply

7.5

Practices minimise and control erosion and degradation of soils.

7.5.1

Unit certification has a detailed soil survey document in 2013 prepared by the DSN Group Agro Research and Development Department. Soil and land suitability classes are listed in the document and mapped on a 1:70,000 scale. The conclusion section states that there is no peat, fragile soil or marginal soil in the operation area. The main soil type is alluvial soil with good drainage with class S2 (Enough Appropriate) at PT. DSN, From the results of a land survey conducted by R&E Agro 1 DSN Group, that the distribution of land in PT KPAS is dominated by the Order of Ultisols (with Sub Groups Typic Kanhapludults, Typic Kandiodults and Plinthic Kandiodults). Most of the soil characteristics in the PT KPAS area have deep soil solum, clay texture, good drainage and low soil fertility, and the land class in the PT KPAS area is mostly in the S2 land class. And based on observations field at the KM9 Estate and LTE Plantation, it is known that the plantation area is relatively flat.

7.5.2 & 7.5.3

Unit certification has a detailed soil survey document in 2013 prepared by the DSN Group Agro Research and Development

Department. Soil and land suitability classes are listed in the document and mapped on a 1:70,000 scale. The conclusion section states that there is no peat, fragile soil or marginal soil in the operation area. The main soil type is alluvial soil with good drainage with class S2 (Enough Appropriate) at PT. DSN.

From the results of a land survey conducted by R&E Agro 1 DSN Group, that the distribution of land in PT KPAS is dominated by the Order of Ultisols (with Sub Groups Typic Kanhappluduts, Typic Kandudults and Plinthic Kandudults). Most of the soil characteristics in the PT KPAS area have deep soil solum, clay texture, good drainage and low soil fertility, and the land class in the PT KPAS area is mostly in the S2 land class.

And based on field observations at the KM9 Estate and LTE Plantation, it is known that the plantation area is relatively flat. Based on the document, it is known that the oldest planting year in the company's area was TT 2008 (13 years) while the youngest was TT 2015 (7 years) so that at the time of the audit, the company had not carried out any 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; 7.6.2; 7.6.3

Unit certification has a detailed soil survey document in 2013 prepared by the DSN Group Agro Research and Development Department. Soil and land suitability classes are listed in the document and mapped on a 1:70,000 scale. The conclusion section states that there is no peat, fragile soil or marginal soil in the operation area. The main soil type is alluvial soil with good drainage with grade S2 (Enough Appropriate) at PT. DSN.

From the results of a land survey conducted by R&E Agro 1 DSN Group, that the distribution of land in PT KPAS is dominated by the Order of Ultisols (with Sub Groups Typic Kanhappluduts, Typic Kandudults and Plinthic Kandudults). Most of the soil characteristics in the PT KPAS area have deep soil solum, clay texture, good drainage and low soil fertility, and the land class in the PT KPAS area is mostly in the S2 land class and based on field observations at the KM9 Estate and LTE Plantation, it is known that the plantation area is relatively flat. Based on the document, it is known that the oldest planting year in the company's area is TT 2008 (13 years) while the youngest is TT 2015 (7 years), so there are no plants with new plant categories.

Status: Comply

7.7

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

7.7.1, 7.7.2, 7.7.3, 7.7.4, 7.7.5, 7.7.6, 7.7.7

Unit certification has a detailed soil survey document in 2013 prepared by the DSN Group Agro Research and Development Department. Soil and land suitability classes are listed in the document and mapped on a 1:70,000 scale. The conclusion section states that there is no peat, fragile soil or marginal soil in the operation area. The main soil type is alluvial soil with good drainage with class S2 (Enough Appropriate) at PT. DSN. From the results of a land survey conducted by R&E Agro 1 DSN Group, that the distribution of land in PT KPAS is dominated by the Order of Ultisols (with Sub Groups Typic Kanhappluduts, Typic Kandudults and Plinthic Kandudults). Most of the soil characteristics in the PT KPAS area have deep soil solum, clay texture, good drainage and low soil fertility, and the land class in the PT KPAS area is mostly in the S2 land class. And based on field observations at the KM9 Estate and LTE Plantation, it is known that the plantation area is relatively flat.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

Based on the documents UKL UPL, DPLH, HCV identification results, as well as the high conservation value area map, it is known that there is a water source in the operational area. Based on this document, it is known that the plan for managing water sources is to test the quality of surface water in several rivers every 6 months, namely in the upstream Wahau river and the Downstream Wahau river. In addition, water quality testing was carried out in the LA monitoring well Block F54, the monitoring well in the E57 control area, and 1 community well in Block F51. All tests are carried out by a KAN accredited laboratory (LP-024-IDN). In this regard, the company shows the results of surface water quality testing for the second half of 2022 to be carried out on November 2nd, 2022. The company conducted surface water tests with 26 indicators which were carried out at the sample points above. Based on the test results data for the Semester 2 period of 2022 there are no parameters that are above the

quality standard.

The results of interviews with workers at LTE, Kemitraan 9 Estate, Kemitraan 7 Estate and POM 7 employees stated that there had never been any complaints about river water. The results of interviews with the Head of Muara Baru Village and the Head of Nehas Liah Bing Village also did not reveal any negative issues related to the condition of the river water.

The unit of certification also does not limit access to clean water, and all workers also have adequate access to clean water. Based on the results of field observations in the LTE housing area, Kemitraan 9 Estate, Kemitraan 7 Estate and Factory Housing 7 as well as interviews with workers, information was obtained that clean water facilities for housing were obtained from reservoirs and rainwater storage facilities. Drinking water testing was also carried out by the company to see the quality of drinking water taken from drilled wells which was carried out by a KAN-accredited laboratory (LP-024-IDN) on November 2nd, 2022. The results of drinking water quality tests also showed that all parameters of the test results were still in accordance with the standard. The quality that applies is Regulation of the Minister of Health Number 32 of 2017.

The company also has procedures regarding Guidelines for Sustainable Plantation Management which include protection against HCV. Based on the results of document verification and field observations at several sampling locations, it is shown that the company has carried out activities to improve water quality, including:

- Conduct outreach to all employees and the surrounding community to maintain water quality.
- Keeping the environment clean around water sources and providing signs prohibiting littering in rivers.
- Report the results of the inspection in accordance with the provisions of the applicable laws and regulations.
- Testing the quality of river water listed in the UKL/UPL report
- Management of erosion and surface water runoff, management of water in the lowlands and monitoring of surface water quality as stated in UKL-UPL implementation each semester.
- Waste water management using WWTP.
- Monitoring the use of water for palm oil processing and evaluation of its use

7.8.2

The company has procedures related to the identification, management and maintenance of water sources and quality listed in the Riparian Management Procedures and Areas Around Danu/Reservoirs or Other Springs document Work Instructions for River Rims (IK-AGR-SHE-06-R01) dated 11 January 2018. The procedure explains that river banks must be protected at least 100 meters from the sides of large rivers and 50 meters from the sides of small rivers, for buffer zones on lakes a radius of 100 meters is given and springs are given a radius of 200 meters. For river and lake borders that have been planted, stakes or red paint are given on the radius as a marker for the Protected Area or Chemical Free Zone area. This procedure is in accordance with Presidential Decree no. 32 of 1990.

The company has carried out border protection, conducted outreach to all parties involved in plantation operations to participate in water protection activities, making boundary markings, and monitoring water resources. The company also has topographical data, identifying water courses and wetlands in the form of a map with a scale of 1:100,000 which includes PT. KPS. The company shows a topographical map showing that the dominant slope ranges from 0 – 15%.

The company continues to make efforts to manage water sources, such as periodically monitoring potential pollution, conducting surface water quality standard tests to ensure that water quality is still within normal limits every semester, and marking the boundaries of chemical application areas in red. In addition, the company also conducts outreach to employees and the surrounding community regarding conservation efforts which can be proven based on the minutes of outreach to Umpang Estate workers on June 25 2022 and there are sign boards related to HCV at several designated points.

Until now there has been no replanting activity. Based on the results of field observations it is known that the riparian area has been maintained in accordance with applicable procedures.

7.8.3

The unit of certification already has facilities for managing POME produced from palm oil processing with a capacity of 60 tons of FFB/hour using WWTP. The POME that has been managed at WWTP is then disposed of in a designated land application area according to the permit the company has obtained from the Environmental Service No. 660/1940/5-DLH/XII/2021 December 20, 2021 which is valid until July 8, 2024. Before being distributed to the land application area, all POME is put into

WWTP to reduce pollutant elements so that it is suitable for application, namely BOD not exceeding 5,000 mg/Lt and pH values range from 6 – 9. The waste treatment facilities owned are as many as 8 ponds consisting of 1 Cooling pond, 1 Mixing Pond, 5 Anaerobic Pond, 1 Sediment Pond and the outlet is in the 7th anaerobic pond.

To find out the eligibility of POME quality, companies carry out tests every month using quality standards referring to Minister of Environment Decree Number 5 of 2014. Companies can show evidence regarding the results of POME quality measurements in the form of documents on the results of tests carried out by laboratories accredited by KAN (LP-024- IDN). Based on the results of the analysis of the test results documents for the period January – December 2022, it shows that all parameters are in accordance with the applicable quality standards. This shows that the POME resulting from FFB management activities is feasible for land applications.

In accordance with the Regulation of the Minister of the Environment No. 28 and No. 29 of 2003 concerning Permits for the Study and Permits for the Utilization of Liquid Waste to land for oil palm plantations, after obtaining a Permit for the Assessment and Utilization of Liquid Waste from PT. KPS monitors the BOD, COD, pH, Oil & Fat, Pb, Cu, Cd and Zn parameter tests periodically every 1 (one) month which is carried out by PT. KPS. Based on PT SUCOFINDO's analysis results for the January to December 2022 testing period, there were no results of testing the quality of liquid waste that exceeded the Threshold Value (NAV).

The company has also reported the results of liquid waste management which are included in the UKL-UPL report every 6 months to the Environmental Office of Kalimantan Timur Province. The UKL UPL reporting for the 2nd semester of 2022 was reported on January 31, 2023 through the SIMPEL application (Electronic Environmental Reporting Information System) with ID No. TTE 1675120685-7198.

7.8.4

The company already has a Surface Water Utilization Permit for PT DSN unit 7 Mill based on the Decree of the Minister of PUPR Number 1793/KPTS/M/2022 on 19 December 2022. In the document there is a provision for a surface water withdrawal quota of 25.02 m3/second or 45,036 m3/month. Location of water intake at the coordinates: 010 16' 53.58 LU; 1160 54' 28.7" E is located on the Wahau River, Muara Wahau District, Kutai Timur Regency.

Companies can also show documents recording daily water use, as well as the results of recapitulation of water use for palm oil processing units every month, for example for the period January – December 2022. Based on surface water utilization data, if the average water use for FFB processing is taken, that is between 38,920.00 m3/month up to 44,970.00 m3/month. This shows that there is no excess use of surface water from the applicable permit.

Companies can also show proof of payment of water fees to the Regional Revenue Service Technical Implementation Unit (UPTPPD) for the period December 2022 to February 2023 with a monthly payment period. The latest example of proof of payment for water levies is based on proof of payment made on 11 April 2023 for total water use in February 2023, the water tax paid is not only for the processing of FFB but for domestic water needs.

The results of field observations at the Water Treatment Plan (WTP) also show that the flowmeter used is still functioning properly. The results of interviews with PAP operators also show that operators are very knowledgeable about how WTP works and recording flowmeter data. Officers can also show data entering and exiting water which is recorded every day.

Status: Comply

7.9

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

7.9.1

The company has made efforts to increase the efficiency of using fossil fuels and optimize the use of available renewable energy, including the use of shells and fiber as an alternative to diesel fuel. The use of renewable energy is monitored and documented through a monthly recapitulation of the use of fossil fuels and solid waste. The use of fossil fuels and utilization of solid waste as a substitute for fossil fuels in 2022 – 2023 are as follows:

NO	PERIOD	FFB Processing (MT)	SHELL (MT)	FIBER (MT)	SOLAR (LT)
1	Jan – Des 2022	378.547	14.008	45.879	21.554
2	Jan – Mar 2023	79.369	2.583	9.546	5.583
	TOTAL	457.916	16.591	55.425	27.137
Status: Comply					

7.10

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

7.10.1

The Certification Unit has carried out a GHG inventory contained in the 2022 Greenhouse Gas Emission Mitigation Program document, based on document analysis it can be concluded that the company has identified the source of GHG produced by the 7 Mill unit and its suppliers. Identification of significant sources of GHG emissions identified and mitigation plans have been developed by the company covering mills and plantations. Significant GHG emissions include changes in land use, processing of POME, use of fertilizers and pesticides, use of fossil fuels for operations and transportation. The mitigation plan includes, among other things, proper dosage of fertilizer use and application according to recommendations, reduction of reuse and recycling actions, restrictions on electricity use, transportation and machine maintenance, as well as regular air quality tests. The company has also reported the results of GHG calculations to the public which are submitted to the RSPO GHG website.

Reduction of fossil fuels at 7 Mill has been accomplished by using fiber and shells for fuel substitution. The company also uses POME to apply to land with test results from the monitoring period January – December 2022 which shows that all parameters of wastewater testing have met the applicable quality standards. Based on document review for example: pesticide use monitoring, diesel fuel monitoring, HCV identification and others it was found that accurate data has been entered into the RSPO GHG Calculator version 4.0. The summary of GHG emissions for the period January – December 2021 is as follows:

General Information

Association	No. of Estates/Plantations	FFB Processed (t)	Planted Area (ha)
Group Plantation	18	179.316,63	15.524,42
3 rd Party	1	186.041,23	0.00
Total	19	365.357,86	15.524,42

Summary Emissions

Description	Value	Unit	Description	Value	Unit
CPO	1,33	tCOe2/tProduct	Oil palm planted on mineral soil	15.524,42	Ha
PK	1,33	tCOe2/tProduct	Oil palm planted area on peat	0,00	Ha
PKO	0,00	tCOe2/tProduct	Total oil palm planted area	15.524,42	Ha
PKE	0,00	tCOe2/tProduct	Conservation area (Forested)	0,00	Ha
OER	22.83	%	Conservation area (non-Forested)	1.583,86	Ha
KER	3.99	%	FFB Production per hectarage	32.40	t/ha

Mill Emissions and Credits & Emissions from Palm Kernel Crusher

Mill Emissions and Credits			Emissions from Palm Kernel Crusher	
Emission Source and Credits	tCO2e	tCO2e/t FFB	Emission Source	tCO2e
POME	71.616,33	0.20	PK from own mill	0,00
Fuel Consumption	1.328,12	0.00	PK from other sources	0.00
Grid Electricity Utilization	0.00	0.00	Fuel Consumption	0.00

Export of Excess Electricity to Housing & Grid	0.00	0.00	Total Crusher Emissions	0,00
Sale of PKS	0.00	0.00		
Sale of EFB	0.00	0.00		
Total	72.944,44	0.20		

Estate / Plantation Field Emissions and Sinks

Description	Emission (tCO2e)			TOTAL
	Own	Group	3rd Party	
Emission Source				
Land Conversion	0,00	77.233,19	0.00	77.233,19
CO2 Emissions from Fertilizer	0,00	38.220,70	0.00	38.220,70
N2O Emissions from Peat	0,00	0,00	0.00	00,00
N2O Emissions from Fertilizer	0,00	23.298,85	0.00	23.298,85
Fuel Consumption	0,00	3.168,03	0.00	3.168,03
Peat Oxidation	0,00	0,00	0.00	0,00
Crop Sequestration	0,00	-103.312,07	0.00	-103.312,07
Sequestration in Conservation Area	0,00	0,00	0.00	0,00
Total	0,00	38.608,70	0.00	-103.312,07

FFB Supplier

NO	Supplier Name	FFB Production by Estate/Plantation (t)	FFB Supplied by Estate/Plantation (t)	Percentage of FFB supplied by Estate/Plantation (%)
1	Melenyu 4	31782.78	10325.01	32.49
2	KM5	7167.92	2267.75	31.64
3	KM7	5572.93	4409.93	79.13
4	Long Teman Estate	21360.35	18466.37	86.45
5	KM9	49350.82	40030.16	81.11
6	KM4	13492.66	584.49	4.33
7	MSE	33961.07	18019.07	53.06
8	SWE	15252.30	15252.30	100.00
9	KM13	25729.48	20903.82	81.24
10	KM14	11646.57	10238.24	87.91
11	KM15	1926.13	1563.92	81.19
12	KM16	15877.51	15847.99	99.81
13	KM19	6551.77	6551.77	100.00
14	KM20	6379.13	6379.13	100.00
15	KM11	11797.68	5719.65	48.48
16	KM12	8126.17	2318.50	28.53
17	KM17	1799.63	387.68	21.54
18	Eksternal	186041.23	186041.23	100.00
19	KM2	49141.51	50.85	0.10

Palm Oli Mill Effluent Treatment

Description	Unit	Value
POME Produced	t/yr	0
Diverted to Compost	%	0
Diverted to anaerobic digestion	%	100
POME to anaerobic pond	%	100

POME to methane capture (flaring)	%	0
POME to methane capture (electricity generation)	%	0
COD value before anaerobic digestion	mg/l	0
COD value after anaerobic digestion	mg/l	0
COD removed during digestion	tCOD/tPOME	0
POME Produce	t/yr	245.703,16
CH4 (Total)	t/yr	3.218,71
Applied N in POME	t/yr	110,57
Total N2O emission from POME	tCO2e/yr	0.74

**POME is processed in WWTP*

Based on the results of the data analysis above, it can be seen that the emission values from CPO and PK production are very low, namely 1.33 tCO₂e/tProduct. The results of interviews with management stated that the low emission was due to an increase in production which caused the supply of FFB to increase, so that the factory operating hours were not the same as the previous period. The low emission value is also due to the fact that all of the company's planting areas are located on mineral land

7.10.2

The Unit of Certification did not carry out new developments after 2014, but the company continued to manage GHG by conducting an inventory of emission sources. They can show identification documents of activities that generate emissions for the 2021 period for Mills and Plantations. This is done to estimate the carbon stock in the management area along with the potential sources of emissions that can occur directly as a result of the management, and a plan to minimize these emissions is developed and implemented.

The GHG emission reduction mitigation plan developed by the company is the use of renewable fuels in the form of shells and fiber as a substitute for diesel, carrying out maintenance on operational equipment on a regular basis, and utilizing POME in Land Applications. Companies can show records of GHG mitigation for Estate and Mill units, for example the use of fertilizers according to the dosage, routine maintenance of operational vehicles, socialization on the prohibition of burning waste, application of efficient use of electricity and integrated pest control to minimize the use of pesticides.

7.10.3

The company has also carried out management and monitoring related to the results of the identification and mitigation plans as evidenced through the UKL-UPL document for semester 2 of 2022 and has reported it to the Kalimantan Timur Province Environmental Service on January 26, 2023.

Based on the document verification, it shows that in the management of air pollution, the unit of certification has conducted air emission tests on boilers and ambient air. The test was carried out by Sucofindo as a KAN accredited laboratory (LP-024-IDN) on August 18 2022. Based on the analysis of the value of the test results it can be concluded that no value is above the applicable quality standard, namely PermenLH Number 07 of 2007 for Boilers and also PPRI Number 22 of 2021 for ambient air.

In addition, the company has also managed disturbances from immovable sources. The tests were carried out by Sucofindo as a KAN-accredited laboratory (LP-024-IDN) on 18 August 2022. The tests carried out by the company included testing for smell, vibration and noise in work and residential areas. Based on the results of document verification, it shows that all test results comply with the quality standards set for each applicable law, namely KepmenLH Number 48 of 1996 for noise, KepmenLH number 49 of 1996 for vibration, and KepmenLH Number 50 of 1996 for odor. .

The company manages greenhouse gases in factories including:

- Utilizing solid waste (fiber and shell) as boiler fuel and calculating the efficiency of using fossil fuels.
- Monitor the quality of immovable emissions with procedures for monitoring and measuring the environment and K3.
- Efforts to control greenhouse gas emissions from wastewater treatment plants or POME.

The management of greenhouse gases such as preventing land fires through daily monitoring at the monitoring tower.

The results of interviews with boiler operators and engine room stations stated that there had never been any hearing-related

problems. The company has also conducted routine related health checks. In addition, the company has required all employees to use PPE in the work area.

Status: Comply

7.11

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

7.11.1

The company has a land clearing policy by not burning land (zero burning) contained in SOP for Land Clearing No. IK-AGR-OLP-01-R04. The procedure was approved by the Operational Director on 01 October 2019. The results of field observations and document verification revealed that there were no replanting and new planting activities in the unit of certification. In addition, based on the results of field observations at LTE, Kemitraan 9 Estate and Kemitraan 7 Estate, it is known that there are no traces of burning as a result of the operational activities of the company and plantation partners.

7.11.2

The Unit of Certification shows fire prevention and control documents for areas that are managed directly. This can be seen in the Fire monitoring report for Semester 2 of 2022 which was reported simultaneously with the UKL UPL report to DLH Kalimantan Timur Province on January 26th, 2023. Based on interviews with the LTE Estate Manager, 9 Estate Partnership, 7 Estate Partnership, Head Miao Baru Village, Head of Nehas Liah Bing Village and Plantation Agency. Kutai Timur is known that in the last 5 years there has been no fire in the company area.

The certification unit regularly monitors land fires. The unit of certification has also carried out the practice of preparedness for the dangers of land fires, including through the activities of a land fire preparedness rally, socialization of land fire dangers and the formation of a KTPA on 30 August 2022 which was attended by 42 people consisting of company representatives, village government, community representatives, sector police, Plantation Agency Kutai Timur Agency and *BPBD* Kutai Timur Regency.

Apart from that, as a form of emergency response to land fires, the certification unit also has preparedness tools for controlling land fires, including in the form of:

- Personal equipment: Safety Helmet, Headlight, Safety Goggles, Mask, Leather Gloves, Gear Belt, Water Bottle, Whistle, Backpack, Fire Boots and Fire Suit.
- Team Equipment: Sleeping tents and mats, first aid kit, workshop equipment, lighting equipment, protective blankets and fire watch towers.
- Hand tools: 2 function axes, sledgehammers, sharp rakes, hoe rakes, shovels, back pumps, torches and chainsaws.
- Water Pump and accessories: Pressure pump, suction hose, outlet hose, nozzle, Y Connector, and portable pump.

7.11.3

The certification unit has involved stakeholders around operational locations in efforts to prevent and control land fires. On August 30th, 2022 socialization of the dangers of land fires was carried out, an alert for land fires and at the same time the formation of a KTPA in 6 Villages. Present at the event were the Muara Wahau Police Chief, the Kutai Timur Plantation Agency, the Muara Wahau Subdistrict Muspika and Kongbeng District Heads, Village Heads, BPD, Customary Institutions and KTPA members from 6 Villages namely Muara Wahau Village, Nehas Liah Bing Village, Dabeq Village, Benhes Village and Miao Baru Village. The ceremony of preparedness was led by the Muara Wahau Police Chief that the responsibility for preventing and handling land fires is a shared responsibility. In addition, there was a speech from the Kongbeng Police Chief, that in clearing land to coordinate with the local government and the ranks of the Indonesian national army-Indonesian Republican Police to create synergy in preventing fire hazards. In addition, there were remarks from the Muara Wahau sub-district and representatives from the DSNG Management. After that, it was continued with the activity of signing the minutes of forming a fire care farmer group.

Based on the results of field observations and interviews with all stakeholders, it is known that during the last 5 year period there have never been any incidents of land fires.

Status: Comply

7.12

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

7.12.1

- The unit of certification has reported PT KPAS's LUCA on September 13, 2016 where the total area of raw liability: 646.26 Ha; Total Area of Conservation Liability: 0.0 Ha with Result of LUC Analysis methodology review: **Pass**. While the notification email from the RSPO was on 2 December 2016.
- The unit of certification has reported LUCA Koperasi Karya Sejahtera (KM 9) on May 22, 2020 where the total area of raw liability: 2,079.67 Ha; Total Area of Conservation Liability: 0.0 Ha with Result of LUC Analysis methodology review: **Pass**. Meanwhile, the notification email from the RSPO was on 30 July 2020.
- The Certification Unit has carried out a LUCA report for the Seleg Sejahtera Bersama Cooperative (KM 7). The certification unit has carried out LUCA with a total area of non-compliant land clearance of 146.41 Ha and a total area of conservation liability of 64,05 Ha. With Result of LUC Analysis methodology review: **Pass**.

7.12.2
1. HCV Assesment di LTE dan Kemitraan 9 Estate

The certification unit has conducted HCV identification on 2013 by RSPO approved assessor. The scope of assessment in accordance to Location Permit number 122/02.188.45/HK/III/2007 with area 7,000 Ha. Potential HCV on this assessment are 817 Ha with item HCV as below:

- HCV1.1: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miao Rivers.
- HCV1.3: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miao Rivers.
- HCV3: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miao Rivers.
- HCV4.1: Wahau, Metuah, Miao, Mejiang, Sinteang Rivers.
- HCV4.2: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miao Rivers.
- HCV5: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miao Rivers.
- HCV6: *Hutan Lindung Desa Miao Baru, Hutan Adat Wehea*

Based on interview with management of PT KPAS sighted that currently HCV6 outside of HGU or cadastral area. The management unit has determined the HCV area as below:

No	Estate	Year of Planted	Block	Division	Area (Hectare)
1	LTE	2012	E35B	2	2.2
2	KM 14	2015	F36A	2	1.4
3	SWE	2011	N40	1	3.1
4	SWE	2014	L49	2	23.7
5	SWE	2013	N47	2	3.8
6	SWE	2015	N44C	2	5.8
7	SWE	2015	M48D	2	3.1
8	SWE	2014	L52A	2	10.2
9	SWE	2014	L51A	2	13.2
10	SWE	2014	J58A	2	7.7
11	SWE	2014	L50A	2	3.7
12	SWE	2014	K65C	3	4.6
13	SWE	2014	J58B	2	2.5
14	SWE	2014	I58A	3	5.1
15	SWE	2013	J60A	3	9.9
16	SWE	2013	J60B	3	4.2
17	SWE	2013	K63A	3	3.5
18	SWE	2014	J64D	3	3.7
Total					111.5

Based on above table sighted that the HCV area on this certification scope is 2.2 Hectare in Division 2, Block E35B, Pesap River bufferzone. Based on field observation to that area sighted that the HCV on good condition and well managed. Based on document verification sighted that there were no new planting after November 2015, so the HCS assessment not applicable for this assessment.

Based on a review of the HCV Assessment document conducted in 2016 and field observations in KM9, it is known that there

is no HCV in Kemitraan 9 Estate.

2. HCV Assesment Kemitraan 7 Estate

The Unit of Certification has carried out Identification of High Conservation Values in 2016 for the scope of 12 Partnerships, including Partnership 7 as one of the DSNG Partnership Community Smallholders under the management of PT. Palm Oil Gods of the Archipelago. Based on the area statement of the 7 Estate Partnership, there were no new clearing areas after 2018. The HCV assessment was carried out in 2016 in collaboration with Aksenta. The composition of the team conducting HCV identification consists of:

- Nandang Mulyana as a Lead for HCV identification (Approved HCV Assessor) and accreditation from RSPO as a Discipline Specialist for HCV studies in the social-economic field.
- Pupung Firman Nurwatha, RSPO Approved HCV Assessor – Discipline Specialist in Biodiversity and Conservation, RSPO Approved HCV Assessor – Team leader and h Provisional ALS at HCVRN.
- Muhammad Igbal as Spatial Analysis and HCV Area Mapping Expert, RSPO Approved HCV Assessor – Discipline Specialist in Hydrology – Environmental Services.
- Reza Abdillah as GIS Specialist.

From the results of this HCV assessment it was concluded that the HCV found were HCV 4 in KM 1, KM 3 and KM 11, and HCV 6 in the form of the sacred area of Beang Wung Dom's tomb who received the title Mas Joyo Surono from Raja Kutai Kartanegara, located in KM 1 Afdeling 5 The total area of HCV or HCVMA management is 37.41 ha. So it was concluded that in the Kemitraan 7 certification unit area there were no HCV areas.

7.12.3

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

7.12.4

Based on the results of the HCV identification it is known that there are HCV areas within the scope of the unit of certification and several types of RTE species consisting of mammals, birds and reptiles. The company has developed and determined an HCV management plan in the 2022 Conservation Area Management Plan document with management scope and annual targets. The integrated management plan is developed in consultation with relevant stakeholders and includes areas that are managed directly. The basis for the preparation of the HCV management program consisted of several villages including Miao Baru Village and Nehas Liah Bing Village. The company manages the HCV area by providing boundary markers, signboards and markers marking the boundaries of the HCV area. The conservation area management programs for 2022 include:

- Marking and installing HCV area boundary markers
- Installation and maintenance of HCV signboards
- Monitoring wildlife encounters
- Monitoring of conservation areas with area patrols and inspections
- Monitoring of enrichment plant maintenance
- Monitoring of protected flora and fauna
- Monitoring signboard facilities and infrastructure
- Monitoring and control of watersheds in conservation areas
- In-situ tree planting in HCV areas
- Outreach to employees regarding conservation
- Conservation for the Village community adjacent to the HCV area.

The implementation of HCV management and monitoring for 2022 is carried out in accordance with the 2022 HCV Management Plan, including:

- Socialization of the HCV area to DSNG Security employees on March 5, 2022 which was attended by 23 people. This activity aims to increase Security's awareness and understanding of the importance of protecting plants, animals and their habitat. In addition to preventing hunting and killing of protected animals.
- Socialization of HCV areas to Security DSNG employees on 25 June 2022 which was attended by 9 people.
- Socialization of the HCV area to the village community around the company on 4 August 2022 at the Muara Wahau District Office. This activity was attended by 48 people consisting of DSNG management representatives, traditional leaders,

village representatives, BPD, Cooperative Management, Contractors, Kong Beng Police and Muara Wahau Police. This activity aims to increase public awareness and understanding of the importance of protecting plants, animals and their habitat. In addition to preventing the occurrence of poaching of animals and encroachment on protected / conservation areas that are in the company's HGU.

Periodic management and monitoring reports of conservation areas which are carried out every month. As an example of the August 2022 report which consists of the following activities:

- Conservation Area Management
 - Protected Area Patrol
 - Installation of Conservation Area Boundary Signs
 - Installation of Signboards/Appeal Boards for Conservation Areas
 - Outreach to Employees and Village Communities around the Company
 - Tree Planting for Species Enrichment and Conservation Area Rehabilitation
- Conservation Area Monitoring
 - Monthly Wildlife Encounters
 - Monitoring of Priority Animals
 - Monitoring of Conservation Area Boundary Marks
 - Monitoring of Conservation Area Signboards/Appeal Boards
 - Monitoring the Success Rate of Tree Planting

The company also has an HCV and topographic area map with a scale of 1:55,000, the map is also equipped with information about: map title, cardinal directions, map legend, map renewal date, and map source.

7.12.5

The company has identified the needs of the community and the areas needed by the affected community to meet their basic needs, taking into account the potential for positive and negative changes in their livelihoods as a result of the company's operational activities. The company has identified and carried out activities to minimize the risks and impacts both for the community and for the environment, for example by providing regular outreach to the community not to apply chemicals to river riparian areas to avoid pollution, not to clear land by burning, and so on.

The unit of certification has also considered various ways of managing and controlling land to protect HCV areas by continuing to protect the rights and livelihoods of the community. The environmental condition of the company, both within the scope and in the community area, is almost entirely an area planted with plantation plants. Currently, the company is also monitoring and patrolling HCV areas, including outreach to the public not to engage in hunting and trading of wild animals. The company has also approached related stakeholders, including:

- Submit a list of protected species found in the *BKSDA* area.
- Provide executive summary to related parties such as local government and surrounding communities.
- Socialization regarding HCV is carried out periodically to find out the extent of community understanding of the existence of HCV in the *DSNG* area and its partnership smallholder.

7.12.6

1. LTE and Kemitraan 9 Estate

Based on the HCV study in the LTE Palm Oil plantation area and the 9 Estate *DSNG* Partnership in 2012 in collaboration with Daemeter Consulting found plant species in the rare and protected category, namely:

- Critically Endangered (CR), namely *Dipterocarpus cornutus*, *Dipterocarpus grandifloras*, *Dipterocarpus cf. Validus*, *Dryobalanops aromatica*, *Hopea sangall*, *Shorea balangeran*, *Shorea blumutensis*, *Shorea singkawang*
- Endangered (EN), namely *Anisoptera laevis*, *Dipterocarpus cf. sublamellatus*, *Dipterocarpus crinitus*, and *Shorea leprosula*,
- Vulnerable, namely *Combretocarpus rotundatus*, *Hopea griffithii*, *Palaquium impressionervium*, *Elaeocarpus acmosepalus*, *Elaeocarpus rugosus*, *Eusideroxylon zwageri*, and *Eugenia conglomerata*

In addition, there are types of animals with rare and protected categories, namely:

- Endangered (Threatened) namely *Nasalis larvatus*, *Hylobates muelleri*, *Manis javanica* and *Prionailurus planiceps*.
- Vulnerable (Vulnerable Category), namely *Leptoptilos javanicus*, *Spizaetus nanus*, *Nycticebus menagensis*, *Tarsius bancanus*, *Petinomys genibarbis* and *Treron capellei*.

2. Kemitraan 7 Estate

Based on the HCV study in the Kemitraan 7 Estate DSNG Oil Palm plantation area in 2016 in collaboration with Aksenta, there are species of mammals in the rare and protected category, namely:

- Critically Endangered (CR), namely *Manis Javanica*.
- Endangered (EN), namely *Pongo pygmaeus*, *Nasalis larvatus* and *Hylobates muelleri*.
- Vulnerable, namely *Helarctos malayanus*, *Neofelis nebulosa*, *Macaca nemestrina*, *Tarsius bancanus*, *Aonyx cinerea*, *Prionodon linsang*, *Cervus unicolor*, *Arctictis binturong*, and *Sus barbatus*.

The company has implemented an outreach program related to RTE on August 4, 2022 which was attended by 48 people consisting of employees, contractors, representatives of Miau Baru Village, representatives of Nehas Liah Bing Village, and other communities.

The unit of certification has conducted monitoring of flora and fauna through routine activities every month in the HCV area. For example, there was monitoring of flora and fauna on March 24, 2023. Monitoring was carried out on foot for 5.97 km no violations of RTE species and found encounters of animals dominated by apes species such as *Merbah Mata Merha*, *Elang Tikus dan Gagak Hutan*. In addition, signs of the existence of animals were found through identification of the sounds of these animals, such as *Wiwik Kelabu dan Takut Tutut*. The unit of certification also makes a map of the results of identification and monitoring of the area so that it is easy to trace disturbance findings, potential plant findings, animal findings, patrol routes, roads, rivers, villages, settlements, HCV Estate areas and boundaries of the unit of certification area.

7.12.7

The company has developed and determined an HCV management plan in the 2023 Conservation Area Management Plan document with management scope and annual targets. The integrated management plan is developed in consultation with relevant stakeholders and includes areas that are managed directly. The company manages the HCV area by providing boundary markers, signboards and markers marking the boundaries of the HCV area.

The implementation of HCV management and monitoring for 2022 is carried out in accordance with the 2022 HCV Management Plan, including:

- Socialization of the HCV area to DSNG security at the Learning Center Office on 25 June 2022 which was attended by 8 people.
- Socialization of HCV areas to DSNG security at the Learning Center Office on 5 March 2022 which was attended by 23 people.
- Socialization of the HCV area to the community and villages around the DSNG company at the Muara Wahau District Office on 4 August 2022 which was attended by 65 people.

This internal and external outreach activity aims to increase Security awareness and understanding of the importance of protecting plants, animals and their habitat, preventing logging and hunting of protected animals, to increase public awareness and understanding of the importance of protecting plants, animals and their habitat, preventing wildlife poaching. –wildlife and encroachment on protected/conservation areas within the company's HGU.

Periodic management and monitoring reports of conservation areas which are carried out every month. For example, the report for March 2023 which consists of the following activities:

- Conservation Area Management
 - Protected Area Patrol
 - Installation of Conservation Area Boundary Signs
 - Installation of Signboards / Appeal Boards for Conservation Areas
 - Tree Planting for Species Enrichment and Conservation Area Rehabilitation
- Conservation Area Monitoring
 - Monthly Wildlife Encounters

- Priority Animal Monitoring
- Monitoring of Conservation Area Boundary Marks
- Monitoring of Conservation Area Signboards / Appeal Boards.
- Monitoring the Success Rate of Tree Planting

7.12.8

About liability status there is an announcement from RSPO, so it doesn't apply Remediation and Compensation Procedure/RaCP:

Resolution GA18-2d, which calls for a review and amendment of the Remediation and Compensation Procedure (RaCP) process as applied to scheme smallholders" was formally adopted at the 18th RSPO General Assembly (GA), which was held virtually on 2 December 2021.

Following the adoption of the Resolution, the Biodiversity and High Conservation Values Working Group (BHCVWG) will be initiating a rapid study to define the conditions and a clear mechanism to implement the reprieve for the various affected parties, i.e., new and existing members, smallholders, the RSPO Secretariat and Certification Bodies.

Any delays in the time bound plan for certification due to this reprieve should not be considered as a failure to deliver on the time bound plan requirements.

The details of the implementation of the reprieve will be announced between April to June 2022.

	Status: Comply	
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3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or ✓
ASA-2	POM 7 of PT Dharma Satya Nusantara did not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	✓
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or ✓
ASA-2	POM 7 of PT Dharma Satya Nusantara did not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	✓
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or ✓
ASA-2	POM 7 of PT Dharma Satya Nusantara did not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	✓
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or ✓
ASA-2	POM 7 of PT Dharma Satya Nusantara did not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of PT Dharma Satya Nusantara 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.

PT Dharma Satya Nusantara Time Bound Plan is explained in table 1.10. PT Dharma Satya Nusantara has sixteen (16) management units with ten (10) mills. PT Dharma Satya Nusantara has informed the Time Bound Plan progress, MUTU has considered that PT Dharma Satya Nusantara is complied with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by PT Dharma Satya Nusantara on 29 September 2022 and signed by Head of Sustainability.

MUTU has verified partial certification for un-certified unit's subsidiary of PT Dharma Satya Nusantara 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 are no significant land conflicts which have not been declared above
- The company has followed RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There are 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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	PT Dharma Satya Nusantara Tbk has carried out self-assessment (e.g., internal audit) against uncertified management units and submitted self-assessment reports year 2022. Self-assessment against uncertified management units as follows: PT Karya Prima Agro Sejahtera on 8-10 August 2022, PT Mitra Nusa Sarana on 7 – 10 June 2022, PT Bima Palma Nugraha on 17 – 19 February 2022, PT Bima Agri Sawit on 16 – 19 April 2022, PT Dharma Inti Sawit Lestari on 14 – 17 June 2022, PT Dharma Persada Sejahtera on 27 – 29 June 2022, PT Kencana Alam Permai on 23 – 25 June 2022, PT Prima Sawit Andalan on 18 – 20 July 2022, PT Pilar Wanapersada on 25 – 27 July 2022 and PT Putra Utama Lestari on 27 – 28 June 2022.
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed to Criterion 7.12 in P&C 2018)	The entire companies under PT Dharma Satya Nusantara Tbk (DSN Group) have conducted HCV assessment. Uncertified management units have conducted HCV assessment and HCS assessment such as: - PT Dharma Persada Sejahtera located in Sintang District, Kalimantan Barat Province has HCV

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>assessment on March 2012 by PT Sonokeling Akreditas Nusantara</p> <ul style="list-style-type: none"> - PT Dharma Intisawit Lestari located in Bulungan District, North Kalimantan Province has HCV assessment on January 2013 by PT Daemeter Consulting - PT Karya Prima Agro Sejahtera located in Kutai Timur District; Kalimantan Timur Province has HCV assessment on July 2013 by PT Daemeter Consulting - PT Agro Andalan located in Sekadau District, West Kalimantan Province has HCV assessment on July 2017 by Remark Asia - PT Bima Palma Nugraha located in Kutai Timur District; Kalimantan Timur Province has HCV – HCS assessment on February 2021 by PT Gagag Dinamiga Aksenta - PT Bima Agri Sawit located in Kutai Timur District, East Kalimantan Province has HCV – HCS assessment on July 2020 by PT Gagag Dinamiga Aksenta - PT Kencana Alam Permai located in Sintang District; Kalimantan Barat Province has HCV assessment on September 2011 by PT Sonokeling Akreditas Nusantara - PT Mitra Nusa Sarana located in Sintang District; Kalimantan Barat Province has HCV assessment on December 2017 by Remark Asia - PT Prima Sawit Andalan located in Sintang District, Kalimantan Barat Province has HCV assessment on January 2012 by PT Sonokeling Akreditas Nusantara - PT Pilar Wanapersada located in Lamandau District, Central Kalimantan Province has HCV assessment on February 2013 by PT Daemeter Consulting - PT Putra Utama Lestari located in Mahakam Hulu and West Kutai District, Kalimantan Timur Province has HCV assessment on February 2014 by PT Gagag Dinamiga Aksenta - PT Mitra Nusa Sarana (MNS) located in Sintang District; Kalimantan Barat Province has HCS assessment report on March 2018 by PT Ata Marie (Ata Marie). The Assessment has been carried out following the 2015 HCSA toolkit (v1) - PT Agro Andalan (AAN) located in Sekadau District, Kalimantan Barat Province has HCS assessment report on February 2018 by PT Ata Marie (Ata Marie). The

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Assessment has been carried out following the 2015 HCSA toolkit (v1)</p> <ul style="list-style-type: none"> - PT Pilar Wanapersada located in Lamandau District, Central Kalimantan Province has Carbon Stock Assessment report on October 2015 by PT Gagas Dinamiga Aksenta <p>Some uncertified management units have carried out land clearing activities since November 2005 without preceded by HCV identification/assessment. Based on RaCP tracker per December 2021 on the RSPO website that the RaCP tracker is being upgraded and is currently in the BETA testing phase (https://rspo.org/certification/remediation-and-compensation/racp-tracker). Information of LUCA for some uncertified management units as follow:</p> <ul style="list-style-type: none"> - PT Karya Prima Agro Sejahtera located in Kutai Timur District, Kalimantan Timur Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat and LUCA has passed with the result of liability assessment is zero. - PT Bima Palma Nugraha located in Kutai Timur District, Kalimantan Timur Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat year 2020 and LUCA has passed. Concept note is on process. - PT Bima Agri Sawit located in Kutai Timur District, Kalimantan Timur Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat year 2020 and LUCA has passed. Concept note is on process. - PT Dharma Intisawit Lestari located in Bulungan District, North Kalimantan Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat and LUCA has passed with the result of liability assessment is 79.60 ha. It has been implemented. - PT Putra Utama Lestari located in Mahakam Hulu and West Kutai District, Kalimantan Timur Province: LUCA and disclosure of non-compliant land clearing was available and it had been submitted to RSPO secretariat and LUCA has passed with liability 3 ha. Concept note is on process.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> - PT Pilar Wanapersada located in Lamandau District, Central Kalimantan Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat and LUCA has passed with liability 1,483.50 ha. Concept note is on process. - PT Agro Andalan (AAN) located in Sekadau District, Kalimantan Barat Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat and LUCA has passed with liability 46.10 ha. Concept note is on process. - PT Dharma Persada Sejahtera located in Sintang District, Kalimantan Barat Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat year 2020 with the result of liability assessment is zero. - PT Prima Sawit Andalan located in Sintang District, Kalimantan Barat Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat year 2020 with the result of liability assessment is zero. - PT Kencana Alam Permai located in Sintang District, Kalimantan Barat Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat year 2020 with the result of liability assessment is zero. - PT Mitra Nusa Sarana (MNS) located in Sintang District, Kalimantan Barat Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat year 2020 and still on RSPO review.
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Based on auditor verification, not all uncertified unit conduct new clearing after January 2010 but for all uncertified unit with land clearing after January 2010 has follow NPP. Detail information of uncertified unit are:</p> <ul style="list-style-type: none"> • PT Bima Agri Sawit (PT BAS), PT Mitra Nusa Sarana (PTMNS), PT Agro Andalan (PT AAN) and PT Bima Palma Nugraha (PT BPN) have conducted NPP verification by CB. Result of NPP verification can be seen on RSPO website. • PT Dharma Satya Nusantara Tbk has proposed a new development plan for its concession that

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>covers an area of 742.39 ha located inside its operational area in PT Bima Agri Sawit (PT BAS) management unit. The plantation properties are in the Desa Baay and Karangan Seberang, Karangan Subdistrict, Kutai Timur District, Kalimantan Timur Province, Indonesia. The NPP verification of PT BAS was conducted by PT TUV Rheinland auditors through document verification and an on-site visit. A preliminary document review was conducted on 14 October 2020 remotely followed by field verification on 4 December 2020. The Summary report of this area is now undergoing 30 days of public notification as required by the RSPO New Planting Procedure 2015 beginning from 25th May 2021 – 24th June 2021. (https://www.rspo.org/certification/new-planting-procedure/public-consultations/pt-dharma-satya-nusantara-pt-bima-agri-sawit-pt-bas).</p> <ul style="list-style-type: none"> PT Dharma Satya Nusantara has proposed a new development plan for its concession that covers an area of 7,392 ha located inside its operational area in PT Mitra Nusa Sarana (PT MNS) management unit. The plantation properties are in the Ketungau Hulu and Central Ketungau Sub District, Sintang District, Kalimantan Barat Province, Indonesia. The NPP verification of PT MNS was conducted through document and field verification. TUV Rheinland auditor conducted a preliminary document review on 30 March 2020. This was followed up with a field verification visit to the proposed new planting area on 27-28 July 2020. The Summary report of this area is now undergoing the 30 days public notification as required by the RSPO New Planting Procedure 2015. (https://www.rspo.org/certification/new-planting-procedure/public-consultations/pt-dharma-satya-nusantara-pt-mitra-nusa-sarana-pt-mns). PT Dharma Satya Nusantara has proposed a new planting area located in Tapang Perodah, Nanga Pemubuh, Setawar, Boti, Sungai Sambang, Mondi, and Nanga Menterap village, Sekadau Hulu subdistrict, Sekadau district, Kalimantan Barat Province, Indonesia. The summary report of PT

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Agro Andalan (PT AAN) New Planting Assessment is now open for.</p> <ul style="list-style-type: none"> Public comments for 30 days as required by the RSPO New Planting Procedure 2015. (https://rspo.org/certification/newplanting-procedure/public-consultations/pt-dharma-satya-nusantara-ptagro-andalan-pt-aan). PT Dharma Satya Nusantara has proposed a new development plan for its concession that covers an area of 286 ha located inside its operational area in the PT Bima Palma Nugraha (PT BPN) management unit. The plantation properties are located in the Desa Tepian Langsat, Desa Tebangan Lembak, Desa Tepian Indah and Desa Tepian Raya, Benganlon subdistrict, Kutai Timur district, Kalimantan Timur province, Indonesia. The NPP verification of PT BPN was conducted through document verification and on-site visit. TUV Rheinland auditor conducted a preliminary document reviewed on 08 February 2021 by remote (virtual process). This is followed up with onsite visit verification to the proposed area for a new planting site on 28-29 April 2021. The Summary report of this area is now undergoing 30 days of public notification as required by the RSPO New Planting Procedure 2015 beginning from 16th June 2021 until 15th July 2021. (https://rspo.org/certification/new-planting-procedure/public-consultations/pt-dharma-satyanusantara-pt-bima-palma-nugraha-pt-bpn).
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 to Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p>Uncertified management units have procedure for land conflict No. SOP-AGR-058-R03 (Prosedur Ganti Rugi Lahan) and No. SOP-AGR-007-R00 (Prosedur Penanganan Konflik).</p> <p>Based on self-assessment there is no land conflict in the location of uncertified management units. Uncertified management units (PT Mitra Nusa Sarana, PT Dharma Persada Nusantara and PT Agro Andalan) provided evidence related land compensation process such as:</p> <ul style="list-style-type: none"> - ID card - Document of land ownership - Statement letter about right of land - Map of land compensation

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> - Minute of land checking - Agreement of land compensation (GRTT) price - Agreement of land compensation - Agreement of land clearance - Statement letter of hand over of land compensation - Payment slip - Documentation of hand over of land compensation (photo- graph). <p>Based on status of complaints on the RSPO website (https://askrspo.force.com/Complaint/s/casetracker) there is no complaint for PT Dharma Satya Nusantara Tbk (DSN Group).</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).	Based on self-assessment of uncertified management units (PT Karya Prima Agro Sejahtera, PT Mitra Nusa Sarana, PT Bima Palma Nugraha, PT Bima Agri Sawit, PT Dharma Inti Sawit Lestari, PT Dharma Persada Sejahtera, PT Kencana Alam Permai, PT Prima Sawit Andalan, PT Pilar Wanapersada and PT Putra Utama Lestari), and desk study on internet that there is no labour dispute issue since last year period until the partial audit conducted on 8 – 9 December 2021.
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>Uncertified management units have list of legal and other requirements presented in list of regulation and law covering plantation, OSH, labor, and environmental sections. The law and regulation is including relevant laws, government regulations, Instruction of President, Minister Regulations, Local Regulations, and Governor Regulations etc. All copies of law and regulations are available and maintained. Uncertified management unit has a record of list and regulation document, already mentioned regulation and law should to be fulfilled by management unit.</p> <p>There is a procedure of identification of laws and other legal requirements, No. SOP-AGR-024-R01. The procedure mentioned identification, source of information, personnel in charge and distribution of legal requirement.</p> <p>Uncertified management units have established a system for tracking any changes in the law. In Procedure of identification of laws and other legal requirements mentioned that SHE/HCD/HCO/Legal department head/legal department conduct updating requirement every 6 months. The source of the information is internet,</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>newspaper and government agencies. Implementation of this procedure is mentioned in report of Summary of Evaluation of Compliance against Laws and Regulations (<i>Ringkasan Evaluasi Kepatuhan terhadap Peraturan Perundangan</i>), document No DK-MS-01A-R01, issued on January 2021.</p> <p>Evidence of regulation compliance from uncertified units such as land use right/ land title, environmental permit, business plantation permit, report of environmental management & monitoring plan year 2021 which has been submitted to government agency etc.</p> <p>Based on self-assessment reports that some of PT Dharma Satya Nusantara's uncertified management units have not comply with legal requirement relates of Land Use Right (HGU) on behalf PT Karya Prima Agro Sejahtera (Kalimantan Timur Province), PT Putra Utama Lestari (Kalimantan Timur Province), PT Dharma Persada Sejahtera (West Kalimantan Province), PT Prima Sawit Andalan (West Kalimantan Province) and PT Mitra Nusa Sarana (West Kalimantan Province) where the current status is on process at Land Agency (BPN).</p>

3.4 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.
3.4.1. Identification of Findings, Corrective Actions and Observations at ASA-1

NCR No.	:	2022.01	Issued by	:	Dwi Premadha Lestari
Date Issued	:	23 Juni 2022	Time Limit	:	21 September 2022
NC Grade	:	Minor raised to Major	Date of Closing	:	20 September 2022
Standard Ref. & Requirement	:	6.7.2 There are procedures for emergency response and work accidents in Indonesian which are clearly understood by all workers. There are workers assigned to the field and other work locations and have received First Aid training in Accidents (P3K). First aid kits are available in the workplace. Records of all work accidents are kept and reviewed regularly.			
Evidence observed (filled by auditor): <ul style="list-style-type: none">The company has procedures that regulate the provision of first aid in the workplace, for example in SOP-AGR-037-R01 November 2013 concerning Occupational Health and Safety.Based on the results of the field visit, the following facts were found:<ul style="list-style-type: none">POM 7: It was found that the contents of the first aid kit had expired since March 2022, such as povion iodine and aquades (3 locations)LTE : The foreman of the spray team does not carry a first aid bagRegular first aid checks have been carried out until June 2022The results of the interview with the person in charge of the first aid kit in question did not understand well about the function of the first aid items, such as alcohol and Povion Iodine, which were mentioned to wash the eyes or the safety pins which were mentioned to take thorns.It has been shown that corrections from the results of field visits, such as replacing expired first aid kits, but have not identified the cause of the problem and how to ensure future follow-up					
Non-Conformance Description (filled by auditor): <ol style="list-style-type: none">The company has not been able to show sufficient evidence that the person in charge of first aid in the field has a good understanding of the use/function of first aid itemsThe company has not been able to show sufficient evidence that the first aid kits available at the workplace are in a ready-to-use condition					
Root Cause Analysis (filled by organization audited): <ol style="list-style-type: none">Lack of socialization to the person in charge of first aid regarding the use/function of first aid itemsImplementing the monitoring of first aid equipment is less thorough, so that checking the expiration date is missed, and is only carried out on the completeness of the item.					
Correction (filled by organization audited): <ol style="list-style-type: none">Re-socialize the person in charge of the first aid kit regarding the use/function of the first aid item regarding the use/function of the first aid itemEvaluate the understanding of the person in charge of the first aid kit regarding the use/function of the first aid itemReplace expired first aid items and increase the number of missing first aid items					

Corrective Action (filled by organization audited):

1. Make a schedule & conduct periodic socialization to the person in charge of First Aid
2. Make an inspection checklist that includes first aid monitoring including the type, amount and expiration date/condition.
3. Monitoring first aid equipment regularly, using a checklist.
4. Doing first aid checks brought by the foreman during the morning circle

Assessor Evaluation and Conclusion (filled by auditor):
Verification on 20 September 2022

The company shows some evidence of improvement as follows, including:

1. Periodic socialization to the person in charge of first aid holders, the last time was on July 08, 2022 for LTE PT. KPAS attended by 18 employees (consisting of Foreman, Assistant, Officer and Medical), July 07 2022 for KM9 Estate attended by 19 employees (consisting of Foreman, Assistant, officers and Medical), and July 05 2022 for POM 7 PT. DSN was attended by 24 employees (consisting of Foreman, Assistant, Officer and Medical).
2. Evaluating the understanding of the person in charge of the function/usage of the First Aid Items carried out by the Medical Officer of each division of the company which was carried out on 05, 07 and 08 July 2022.
3. Monitoring the contents of the first aid kit every month (which has been done in June – July 2022), to ensure the expiration period of each first aid item.
4. The latest first-aid program training schedule per 27 June 2022 for all employees, consisting of:
 - Periodic socialization of PIC P3K POM 7 and KM9 Estate
 - Evaluation of Understanding the Uses/functions of P3K POM 7 and KM9 Estate
5. Monitoring the contents of the Foreman's First Aid bag every day during morning apples, and reported to the Estate Manager every month (which has been carried out in June – July 2022).

Auditor conclusion :

Based on the proof of repair that has been sent, this discrepancy has been fulfilled. The implementation of the first aid monitoring program and understanding of the use of first aid will be re-evaluated in the next assessment.

Verified by : **Dwi Premadha Lestari**

NCR No.	:	2022.02	Issued by	:	Dwi Premadha Lestari
Date Issued	:	23 Juni 2022	Time Limit	:	21 September 2022
NC Grade	:	Major	Date of Closing	:	02 August 2022
Standard Ref. & Requirement	:	6.7.3 Workers use appropriate Personal Protective Equipment (PPE), and it is provided free of charge to all workers in the workplace, as protection in all operations that have potential hazards, such as pesticide application, machine operation, land preparation, and harvesting. Sanitation facilities are available for workers who use pesticides so that workers can remove PPE, clean themselves and put on their personal clothes.			
Evidence observed (filled by auditor): <ul style="list-style-type: none">Standard for Personal Protective Equipment for Plantation Employees (Document No. DK-SHE-140-R04) dated October 1, 2018 and among others states:<ul style="list-style-type: none">Toe protection: 7 inch PVC boots with pullHand protection: 5 piles cloth gloves					

- SOP-AGR-072-R00 dated September 1, 2016 regarding PPE, for example for harvesters, are as follows:
 - Head protection and eye protection: Helmet and Goggles
 - Gloves: Cotton gloves
 - Shoes : 10" PVC Boots
- Spinal guard: Break support belt
 - The results of the field visit found the following facts:
 - KM 9 :
 - When checking the HGU stake (Block E60) it was found that there was 1 harvester who was wearing gambir shoes
 - Block E19 afdeling1 KM 9 two harvesters do not use cotton gloves
 - LTE :
 - When checking the HGU stakes, it was found that 1 harvester and 1 FFB loader were wearing gambir shoes
 - Personal protective equipment in accordance with established procedures and standards has actually been given to every employee, for example the handover of PPE for the period March 2022
- Socialization on the use of PPE on June 22, 2022 which was held in the LTE Meeting Room and was attended by 12 people. Documentation of job descriptions for the 1st afdeling foreman, harvesting foreman and foreman of care, one of which explains ensuring that the PPE provided by the company has been used properly by its workers.

Non-Conformance Description (filled by auditor):

The company has not been able to show sufficient evidence that all workers have used the PPE that has been provided.

Root Cause Analysis (filled by organization audited):

Harvest workers do not fully understand the PPE standards set by the company.

Correction (filled by organization audited):

Conducting re-socialization to harvest workers regarding PPE standards.

Corrective Action (filled by organization audited):

1. Monitoring the use of standard PPE during the morning circle
2. Conduct patrols for compliance with the use of standard PPE for harvest workers

Assessor Evaluation and Conclusion (filled by auditor):
Verification on 02 August 2022

The company shows some evidence of improvement as follows, including:

1. The company re-socializes harvest workers regarding PT. KPAS which was held on 28 June 2022 at KM9 Estate and attended by 27 employees, and 29 June 2022 at LTE and attended by 38 employees.
2. The KM9 foreman monitors PPE during the morning call at PT. KPAS Afd 3 KM9 Estate on 28, 29, 30 June and 1 July 2022, the LTE foreman monitored PPE during the morning meeting at Afd 2 LTE on 28 and 29 June 2022.
3. The company shows monitoring of violations of the use of PPE for the period June – July 2022 carried out by the K3L assistant on KM9 Estate and LTE, based on document verification, it is known that the use of PPE is complete, monitoring is reported every month and checked by the Plantation Head.

Kesimpulan Auditor:

Based on the proof of repair that has been sent, this discrepancy has been fulfilled. The implementation of the monitoring program for the use of PPE will continue and will be re-evaluated in the next assessment.

Verified by : **Dwi Premadha Lestari**

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-2

NCR No	: 2023.01	Issued by	: Septian Maulana
Date Issued	: 14 April 2023	Time Limit	: ASA 3
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	2.2.2 All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party		
Evidence observed (filled by auditor): Based on the results of a review of the document list of FFB contractors/ suppliers who work with the company, for example in PKS 7 during 2022 it is known that there are 20 External FFB Suppliers, including PT Berau Karetindo Lestari and PT Tepian Borneo Sejahtera, as well as 4 vehicle rental contractors (Maria Fitri Agus, Kajad, Edi Rusman and Sunarsih). Companies can show that contracts including those with FFB suppliers have separate clauses regarding the fulfillment of relevant legal obligations, for example those contained in the Purchase Order document No. 1044002924 dated PO 7 – 15 November 2022 to PT Berau Karetindo Lestari as: <ul style="list-style-type: none">• The second party must include its workforce in the BPJS Employment and BPJS Health programs.• The second party complies with the laws and regulations in force in Indonesia, especially those governing employment, occupational safety and health and the environment (K3L), road traffic and transportation, as well as the first party's sustainability policy, including but not limited to:<ul style="list-style-type: none">- Provision of wages in accordance with the City/District Minimum Wage (UMK) for its workforce.- Do not employ child labor under the age of 18.- Do not practice forced labor.- Do not employ workers from the results of human trafficking.- The second party provides the necessary PPE and requires and guarantees that its workforce uses the PPE during work implementation with the following conditions: Helmets, Safety Shoes, Masks and Gloves. The company can show proof of compliance with regulations made by vehicle rental contractors (Maria Fitri Agus, Kajad, Edi Rusman and Sunarsih) such as contractor performance evaluations, salary slips and proof of BPJS membership for contractor employees. However, the company has not been able to show documentation of the implementation of relevant legal obligations by PT Berau Karetindo Lestari and PT Tepian Borneo Sejahtera.			
Non-Conformance Description (filled by auditor): The company has not been able to show evidence that the fulfillment of relevant legal obligations can be proven by the third party concerned.			
Root Cause Analysis (filled by organization audited): The FFB supplier at PT Berau Karetindo Lestari is not willing to provide information regarding legal compliance that has been implemented for their employees.			
Correction (filled by organization audited): For the 2023 New Contract a special article was added stating that vendors/ contractors must willing to provide the requested information when the DSN plantation/ Mill is carrying out an audit. Meanwhile, an addendum will made to te contract that is still valid in 2023.			
Corrective Action (filled by organization audited): <ul style="list-style-type: none">• Make monitoring of the old and new contract related the additon of separate clause regarding the vendor/ contractor must be willing to provide the requested information when plantation/ Mill DSN carrying out an audit.• Conduct socialization of the addition of the clause to stakeholders and provide evidence of socialization in the form of			

attendance list and documentation.	
Assessor Evaluation and Conclusion (filled by auditor):	
Verified by	:

NCR No.	:	2023.02	Issued by	:	Firda Tarunajaya																								
Date Issued	:	14 April 2023	Time Limit	:	Recommendation 13 July 2023																								
NC Grade	:	Minor	Date of Closing	:																									
Standard Ref. & Requirement	:	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.																											
Evidence observed (filled by auditor): The company shows an annual report document using the RSPO Metric Template. However, there are still a number of items that are not in accordance with the supporting report, among others:																													
<table border="1"> <thead> <tr> <th>Indikator</th> <th>Metric Template</th> <th>Others Documents</th> <th>Satuan</th> </tr> </thead> <tbody> <tr> <td>CPO Certified Production</td> <td>9.538,00</td> <td>9.556,43</td> <td>Ton</td> </tr> <tr> <td>CPO Non Certified Production</td> <td>73.862,00</td> <td>73.843,73</td> <td>Ton</td> </tr> <tr> <td>CPO Sales – RSPO</td> <td>3.560,65</td> <td>9.589,54</td> <td>Ton</td> </tr> <tr> <td>Total Hours Worked Kemitraan 9 & LTE</td> <td>38.800,00</td> <td>1.824.677</td> <td>Jam Kerja</td> </tr> <tr> <td>Use Water</td> <td>0</td> <td>328.050</td> <td>M3</td> </tr> </tbody> </table>						Indikator	Metric Template	Others Documents	Satuan	CPO Certified Production	9.538,00	9.556,43	Ton	CPO Non Certified Production	73.862,00	73.843,73	Ton	CPO Sales – RSPO	3.560,65	9.589,54	Ton	Total Hours Worked Kemitraan 9 & LTE	38.800,00	1.824.677	Jam Kerja	Use Water	0	328.050	M3
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Non-Conformance Description (filled by auditor): The company has not been able to show evidence that the annual report using the RSPO Metric Template is in accordance with actual conditions.																													
Root Cause Analysis (filled by organization audited): There is a misunderstanding regarding the data provided (all PT KPAS & KM9) with the scope of the RSPO certification which only covers Long Friend Estate (LTE) 504.5 Ha and KM9 800 Ha.																													
Correction (filled by organization audited): Revise the data metric template based on the audit scope area, namely LTE 504.5 Ha and KM9 800 ha.																													
Corrective Action (filled by organization audited): Create the required data template on the metric template in accordance with the scope of the audit, with each estate separated between certified and non-certified areas.																													
Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification 24 June 2023: The certification unit has determined the root of the problem, correction and corrective action, but there are still questions from the auditor that need further explanation. In addition, the company has not shown any documented evidence of improvement. Based on the description above, this discrepancy has not been fulfilled until the unit of certification has made repairs in a comprehensive and documented manner.																													
Auditor Verification 14 July 2023: The unit of certification has made improvements to the RSPO metric template, but still needs to show primary surface water																													

use data for the January-December 2022 period. In addition, there are differences in CPO production data, PK production & selling data between the Mass Balance data and the metric template. The unit of certification also needs to provide responses to the Auditor's questions in the column Root causes analysis, Correction, and Corrective action, bearing in mind that in the Guidelines for the Matric Template the principles and criteria of the RSPO 2018 (Document Code RSPO-GUI-P03-003 V1 IND), indicator 3.0 is explained that the completed RSPO P&C Matric Template is submitted by the certification unit to the Certification Body prior to the audit. Based on the description above, this discrepancy has not been fulfilled.

Auditor Verification 08 August 2023:

The unit of certification has determined the root cause, correction and corrective action and can be accepted by the auditor. In addition, the Unit of Certification has made improvements to the RSPO metric template. Based on the description above, this discrepancy is fulfilled and will be observed again regarding its implementation and consistency in the next assessment

Verified by : **Firda Tarunajaya**

NCR No.	: 2023.03	Issued by	: Rahmat Abdiansyah
Date Issued	: 14 April 2023	Time Limit	: 13 July 2023
NC Grade	: Major	Date of Closing	: 25 June 2023
Standard Ref. & Requirement	3.8.12 Record keeping 2. The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii. Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. 2. For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis iv. For Mass Balance Module, the mill: a) shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)		

Evidence observed (filled by auditor):

Based on verification of mass balance record documents for PK products (period January 2022 to March 2023) it is known that there were negative stocks in the following periods with details:

Period	PK Production (Ton)		PK Delivery (Ton)			Stock
	Certified	Uncertified	Certified	Other Scheme	Non Certified	Certified
Stock Opening						90.793
Jan-22	150.298	674.339	149.688	-	-	91.403
Feb-22	143.721	785.618	311.775	-	-	(76.651)

Mar-22	165.547	834.692	181.233	-	-	(92.337)
						Negative
Apr-22	200.924	828.503	204.931	-	-	(96.344)
May-22	140.969	970.334	141.780	-	-	(97.155)
Jun-22	174.014	1,336.142	155.206	-	-	(78.347)
						Negative
Jul-22	123.137	1,273.697	132.094	-	-	(87.304)
Aug-22	111.341	1,357.083	111.851	-	-	(87.814)
Sep-22	162.341	1,249.946	153.302	-	-	(78.775)
						Negative
Oct-22	158.974	1,172.325	156.455	-	-	(76.256)
Nov-22	91.000	1,245.721	98.264	-	-	(83.520)
Dec-22	56.885	1,154.868	54.075	-	-	(80.710)
						Negative
Jan-23	96.892	853.572	90.024	-	-	(73.842)
Feb-23	116.163	806.998	0	-	-	-
Mar-23	34.703	850.363	0	-	-	-
Total	2,017.702	15,394.201	1,940.678	-	-	-

Non-Conformance Description (filled by auditor):

The company has not been able to ensure the balance of all receipts of RSPO certified FFB and shipments of RSPO certified CPO and PK every three months.

Root Cause Analysis (filled by organization audited):

The system for verifying/monitoring the correctness of inputs and calculating "Mass Balance" has not been running consistently due to the replacement of the SCCS PIC.

Correction (filled by organization audited):

1. Manage the receipt of FFB, delivery and downgrade of CSPK products to non-certified products to return PK Certified negative stocks.
2. Dissemination and refreshment of the principles of SCCS and Mass Balance to PICs who handle and monitor the production and sales of certified products, both CSPO and CSPK

Corrective Action (filled by organization audited):

1. The Mill Head assigns a special PIC to periodically monitor the production, delivery and sales of CSPO & CSPK products
2. Periodic refreshment for the PIC who monitors the production and sales of CSPO & CSPK products and provides evidence of socialization in the form of attendance lists and documentation.

Assessor Evaluation and Conclusion (filled by auditor):
Auditor Verification June 17, 2023

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

- Mass balance records for PK PKS 7 products updated up to the May 2023 period. From the results of these recordings, CSPK stocks up to the May 2023 period were positive of 2.177 Kg.
- Evidence of PIC determination of SCCS implementation through a letter that has been signed by the Mill Head of PKS 7. The PIC assigned by the company responsible for implementing SCCS is the Production Assistant. In order to show

the duties and responsibilities of the SCCS implementation PIC.

- Documentation and attendance list for the SCCS Refreshment Training activities on 7-8 June 2022 online for participants from the DSN Group including PIC from PKS 7. So that the refreshment materials provided to participants can be shown.
- Root cause analysis, correction, and Corrective Action. However, there are still questions from the Auditor related to the root of the problem and Corrective Action.

Based on the evidence, non-compliance with this indicator is stated as Not Fulfilled.

Auditor Verification June 25, 2023

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

- Correction of root causes and corrective actions according to Auditor's comments/questions.
- Duties and responsibilities of PIC SCCS. In the duties and responsibilities of the PIC SCCS it is explained that one of the PICs is to record and balance all receipts of RSPO certified FFB and shipments of RSPO certified CPO and PK a maximum of every three months.
- SCCS training materials for SCCS PICs. In the training materials, it is explained that the quantity of RSPO Mass Balance oil palm product inputs and outputs (volume or weight) must be balanced within a fixed inventory period which cannot exceed 3 months. In addition, it was also explained that with the SCCS training, the PIC would conduct regular monitoring every month. Maximum for the 2nd month if there is a minus stock, the delivery of CPO, PK and PKO will be stopped. Determination of the SCCS PIC and SCCS training provided as a corrective action by the company so that the root causes of problems and discrepancies do not recur.

Based on this evidence, the non-compliance with this indicator is declared to have been fulfilled.

Follow up on next audit (filled by auditor):

Verified by : Rahmat Abdiansyah

NCR No.	:	2023.04	Issued by	:	Rahmat Abdiansyah
Date Issued	:	14 April 2022	Time Limit	:	13 July 2023
NC Grade	:	Major	Date of Closing	:	07 July 2023
Standard Ref. & Requirement	:	4.4.1 Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.			
Evidence observed (filled by auditor):					
1. The Seleq Sejahtera Bersama Cooperative already has documents on the Granting of Rights from the Kutai Timur Regency Land Office, namely: <ul style="list-style-type: none">Decree of the Head of the Kutai Timur District Land Office Number 42/2018 dated 14 August 2018 concerning the Granting of Property Rights in the name of Simson Lawai, DKK for 149 plots covering an area of 171.0522 Ha.Decree of the Head of the Kutai Timur Regency Land Office Number 77/2018 dated 5 October 2018 concerning the Granting of Property Rights in the name of Saut P. Napitupulu in 17 Fields covering an area of 15.9513 Ha. In the two decrees it is explained in the third part that in order to obtain proof of land rights in the form of a certificate of ownership, the recipient of the right is required to register the right of ownership at the Kutai Timur Land Office no later than 3 (three) months from the date of the decision.					

2. Based on the results of interviews with management representatives, it is known that the Seleg Sejahtera Bersama cooperative has registered ownership rights and has issued certificates of ownership rights (SHM). However, until the audit was carried out, the SHM could not be demonstrated.

Non-Conformance Description (filled by auditor):

Based on this evidence, the Seleg Sejahtera Bersama Cooperative has not been able to show proof of ownership certificates (SHM) which show legal land ownership.

Root Cause Analysis (filled by organization audited):

The SHM document cannot be shown to the Auditor because it is collateral for borrowing funds from the Bank. Only Handover Event Minutes are available between the company and the Bank and the SHM list.

Correction (filled by organization audited):

Make an application to the Bank to be able to show the required SHM. If this is not possible, make a statement explaining that the SHM of members of the Cooperative is true and is used as collateral at the Bank.

Corrective Action (filled by organization audited):

- If SHM is used as collateral, before handing it over to the Bank, a scan/copy is done first as a company file
- Outreach to legal parties about the importance of SHM documents as one of the ISPO-RSPO audit prerequisites
- Create procedures related to the SHM document handling mechanism.

Assessor Evaluation and Conclusion (filled by auditor):
Auditor Verification June 17, 2023

The company has sent proof of improvement in the form of root problems, corrections and corrective actions. However, there are still questions/comments from the auditor in the correction and corrective action columns. Based on this explanation, non-compliance with this indicator is declared as Not Fulfilled.

Auditor Verification dated 25 June 2023

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

- Minutes of checking the ownership certificates between the Lay Sejahtera Cooperative and the Seleg Sejahtera Bersama Cooperative with Bank Mandiri (Persero) Tbk on September 17 2021. The minutes explained that an inspection had been carried out for the completeness of the Property Rights Certificates carried out by Bank Mandiri and the Cooperative. From the results of the inspection it was found that the Seleg Sejahtera Bersama Cooperative has a total of 166 HM fields with a total area of 187 Ha.
- Details of the names of the farmers according to the Document of Granting Rights from the Land Office of East Kutai Regency. The summary is as follows:
 1. Decree of the Head of the East Kutai Regency Land Office Number 42/2018 dated 14 August 2018, consisting of 149 fields covering an area of 171.0522 Ha.
 2. Decree of the Head of the East Kutai Regency Land Office Number 77/2018 dated 5 October 2018, consisting of 17 fields covering an area of 15.9513 Ha.
- The company has established corrective actions to prevent the root of the problem from recurring, such as outreach to legal parties that the importance of SHM documents is one of the ISPO-RSPO audit requirements, and creating procedures related to the mechanism for handling SHM documents. But the two documents can not be shown.

Based on this explanation, non-compliance with this indicator is declared as Not Fulfilled.

Auditor Verification July 7, 2023

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

- Documentation Procedure for SHM Plasma Certificate with Document Number DK-AGR-LGL-001-R00 on July 4, 2023. This procedure explains the handling of SHM plasma documents that are guaranteed (filling has not yet been done).
- Outreach to legal parties about the importance of SHM documents as one of the prerequisites for the ISPO-RSPO

audit which was conducted on 04 July 2023.	
<ul style="list-style-type: none"> Root Cause Analysis, Correction, and Corrective Action. 	
Based on the proof of improvement sent by the company, the discrepancies in this indicator are declared Fulfilled.	
Verified by	: Rahmat Abdiansyah

NCR No.	:	2023.05	Issued by	:	Rahmat Abdiansyah
Date Issued	:	14 April 2023	Time Limit	:	ASA 3
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	Certification System 5.5.2 Time-bound plan: A time-bound plan for certifying all its management units and/or entities, including the units where the organisation has management control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills a. As a minimum, all estates and mills shall be certified within five (5) years after obtaining RSPO membership. Any new acquisitions shall be certified within a three-year time frame. Any deviations from these maximum periods requires a approval by the RSPO Secretariat. b. Progress towards this plan shall be verified and reported in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB that first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness. c. Any revision to the time-bound plan, including for the scheme smallholders and outgrowers, shall be reviewed by the CB. Changes to the time- bound plan are permitted only if the organisation can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment the company is legally registered with the local notary or chamber of commerce (or equivalent). d. Where there are isolated lapses in the implementation of a time-bound plan, a minor non-compliance shall be raised. If there is evidence of fundamental failure to proceed with the implementation of the plan, a major non-compliance shall be raised.			
Evidence observed (filled by auditor):					
<ul style="list-style-type: none">Based on the results of field visits to Partnership 9, for example in blocks B64 and block D62/63, it is known that these areas are directly adjacent to the Non Certified Partnership area 9. The results of interviews with company representatives show that the Non Certified areas have not been certified because the legal rights in the form of SHM have not been issued .Based on the results of interviews with company representatives, it is known that the certified Partnership 9 area is 800 Ha (this is in accordance with the scope of certification) and the uncertified Partnership 9 area is 1,200 Ha and the Non-certified area is fully managed by the company.					

- Based on the results of interviews with representatives of the Karya Sejahtera Cooperative (Kemitraan 9), it is known that partnership development cooperation with companies began in 2012 and plantation management was fully carried out by the company.
- The MoU between PT Karya Prima Agro Sejahtera and the Karya Sejahtera Cooperative regarding the development and management of oil palm plasma plantations in a partnership pattern dated 24 February 2007 stated that both parties agreed to cooperate in the development and management of oil palm plasma plantations covering an area of $\pm 2,000$ Ha. In point 8 it is known that the development and management of plasma plantations is carried out by the company.
- Based on the verification of PT Dharma Satya Nusantara's Time Bound Plan document which was approved by RSPO on 29 September 2022, it is known that there is no schedule for the Non-Certified Partnership 9 units to be certified.

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

The company has not been able to show evidence that the 9 Non-certified partnership areas that are managed directly by the company have been included in the Time Bound Plan they have.

Root Cause Analysis *(filled by organization audited):*
Correction *(filled by organization audited):*
Corrective Action *(filled by organization audited):*
Assessor Evaluation and Conclusion *(filled by auditor):*
Verified by
3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	3.7.1	The company has an engine room station, each of which consists of 3 units of generator engines (capacity of 400 KW, 400 KW and 160 KW), as well as a turbine with a capacity of 1,600 KW. Based on the document review and the results of interviews with operators at the engine room station, it is known that the division of work shifts consists of 3 shifts with each shift consisting of 1 operator, 2 operators already have SIO OHS Motor Diesel class 1 and 1 worker is being submitted OHS Motor Diesel class training for <i>PJK3</i> vendors. Companies are encouraged to ensure that the training that has been submitted to <i>PJK3</i> vendors can be carried out.

3.4.4. Noteworthy Positive Components

No	Ref. Std.	Description
1	-	Commitment to implement the principles of sustainable oil palm plantation management
2	-	Teamwork and competent human resources in their respective fields
3	-	PKS 7 POM has received "PROPERDA Hijau" from Kalimantan Timur Province for the 2021/2022
4	-	PKS 7 POM has received " PROPER Biru" from the Ministry of Environment and Forestry for the 2021/2022

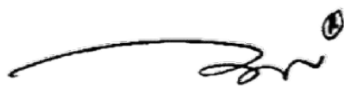

5	-	Has implemented social responsibility programs to the community whose benefits are felt in real terms
6	-	No longer using limited pesticides with the active ingredient Paraquat

3.5 Summary of Arising Issues from Public and Auditor Verification

Issues from Public	Auditor Verification
<p>Gender Committee Kemitraan 9</p> <p>The gender committee is engaged in activities related to the protection of women's rights and as a forum in the event of sexual harassment or violence. So far there have been no incidents of sexual harassment or violence in the company's operational areas and employees are aware of the existence and function of the gender committee.</p>	<p>There are no negative issues that need further verification.</p>
<p>Plantation Agency of Kutai Timur District Interviewee: Staf Penilai Usaha Perkebunan Date: 11 April 2023</p> <ul style="list-style-type: none"> • Currently there are no negative issues or land disputes. • There are no reports of fire cases for the last 3 years. • The company has regularly reported mandatory reports. • There are no negative issues related to the application of agronomy by the company. • There has been no change in permits related to HGU, IUP and location permits. • CSR reports belonging to the company are reported to the department. • There are no issues related to land dispute conflicts with the community • There are no issues related to overlapping forest areas. • The company has adequate fire emergency response facilities in accordance with the direction of the department. • The company is active in routine meetings to determine FFB prices conducted by the agency. 	<p>This has been verified in the report.</p>
<p>Environment Agency of Kutai Timur District Interviewee: Kasie Perijinan dan Pelaporan Date: 11 April 2023</p> <ul style="list-style-type: none"> • Communication between the company and the Environment Agency is going quite well, and the company is cooperative if there are calls and questions from the Environment Agency. • The hazardous and toxic waste hazardous waste warehouse permit owned by the company is still valid and has complied with the provisions. • Compulsory reports are routinely and completely reported by the Company. • So far, there have been no environmental pollution issues carried out by the company. • The company has carried out several environmental quality tests in accordance with applicable regulations in Indonesia. 	<p>This has been verified in the report.</p>
<p>Manpower and Transmigration Agency of Kutai Timur District Interviewee: Kabid Hubungan Industrial dan Jamsostek Date: 11 April 2023</p> <ul style="list-style-type: none"> • The company already has a labor union but there has been no submission of a collective labor agreement. 	<p>This has been verified in the report.</p>

Issues from Public	Auditor Verification
<ul style="list-style-type: none"> • The company has provided OHS facilities for workers. • The company provides wages according to the provisions of the government. • During the past year there have been no issues related to industrial relations. • Mandatory reports related to employment have been submitted regularly • The company has implemented the use of local labor. • The current wage for <i>UMK</i> 2023 	
Kutai Timur Regency Land Office Interviewee: Kasie Penetapan Hak & Pendaftaran Date: 11 April 2023 <ul style="list-style-type: none"> • There are no new location permits and additional HGU • There are no reports of land disputes • The company has sent reports regularly • The company is quite cooperative with the Land Office • There is no overlap with the forest area and there are no reports from other parties related to plantation boundary markers. 	<p>This has been verified in the report.</p>
Miau Baru Village Interviewee: Head of Village Date: 11 April 2023 <ul style="list-style-type: none"> • There are no more customary communities on the village. Village occupant were mixed, consist of people from Melayu, Dayak, Jawa, etc. • There is no land conflict and occupation within estate operational areas, which claimed by village members. • Presence of PT KPAS has considered gave a positive impact for economic and social community life. • Head of Village and village representative has been involved on annual CSR program through inviting company representatives during arrangement of annual village budget (APBDes) meeting. • There are no negative issues related to land fire and environment pollution or contamination, caused by company operational activities. 	<p>This has been verified in the report.</p>
Nehas Liah Bing Village Interviewee: Head of Village Date: 11 April 2023 <ul style="list-style-type: none"> • There are no more customary communities on the village. Village occupant were mixed, consist of people from Melayu, Dayak, Jawa, etc. • There are no land conflict and occupation within estate operational areas, which claimed by village members. • Presence of PT KPAS has considered gave a positive impact for economic and social community life. • Head of Village and village representative has been involved on annual CSR program through inviting company representatives during arrangement of annual village budget (APBDes) meeting. • There are no negative issues related to land fire and environment pollution or contamination, caused by company operational activities 	<p>This has been verified in the report.</p>

Issues from Public	Auditor Verification
<p>KSU Seleq Sejahtera Bersama Interviewee: Head of Cooperative Date: 11 April 2023</p> <ul style="list-style-type: none"> • Good relationship between smallholders, cooperatives and companies • Smallholders get much money of their operations every month • There are no land conflict and occupation within estate operational areas, • Currently there are no negative issues or land disputes 	<p>This has been verified in the report.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Dharma Satya Nusantara Management Representative</p>  <p><u>Agustinus Triwibwo</u> Friday, 07 July 2023</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Briyogi Shadiwa</u> Friday, 07 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	Plantation agency	Kutai Timur Regency, Kalimantan Timur Province	-	By Phone	11 April 2023	✓	
2	Manpower agency	Kutai Timur Regency, Kalimantan Timur Province	-	By Phone	11 April 2023	✓	
3	Environment Agency	Kutai Timur Regency, Kalimantan Timur Province	-	By Phone	11 April 2023	✓	
4	Land National Agency	Kutai Timur Regency, Kalimantan Timur Province	-	By Phone	11 April 2023	✓	
5	FFB Supplier Berau Karetindo Lestari	Kutai Timur Regency, Kalimantan Timur Province	-	By Phone	11 April 2023	✓	
6	Cooperative Seleg Sejahtera Bersama	Kutai Timur Regency, Kalimantan Timur Province	-	By Phone	11 April 2023	✓	
7	Gender Committee Kemitraan 9	PT Karya Prima Agro Sejahtera, Kutai Timur Regency, Kalimantan Timur Province	-	Direct Interview	11 April 2023	✓	
8	Kemitraan 9 <ul style="list-style-type: none"> 1 Harvest Foreman 2 Harvesters 1 Upkeep Foreman 3 Upkeep Workers 	PT Karya Prima Agro Sejahtera, Kutai Timur Regency, Kalimantan Timur Province	-	Direct Interview	11 April 2023	✓	
9	Kemitraan 7 <ul style="list-style-type: none"> 1 Harvest Foreman 3 Harvesters 1 Upkeep Foreman 3 Upkeep Workers 1 Daycare Worker 	PT Dewata Sawit Nusantara, Kutai Timur Regency, Kalimantan Timur Province	-	Direct Interview	12 April 2023	✓	
10	Long Teman Estate: <ul style="list-style-type: none"> 2 Daycare Worker 1 Genset Operator 4 Pesticide Applicator 	PT Karya Prima Agro Sejahtera, Kutai Timur Regency, Kalimantan Timur Province	-	Direct Interview	12 April 2023	✓	

	<ul style="list-style-type: none"> • 2 Nurse • 1 Warehouse Worker • 1 Mechanic • 						
11	PKS 7: <ul style="list-style-type: none"> • 2 WWTP Operator • 1 WTP Operator • 1 Housing Residents • 	PT Karya Prima Agro Sejahtera, Kutai Timur Regency, Kalimantan Timur Province	-	Direct Interview	12 April 2023	✓	
12	Sawit Watch	Bogor City, Jawa Barat Province	info@sawitwatch.or.id	Via Email	31 March 2023	-	✓
13	WWF	Jakarta Selatan City, DKI Jakarta Province	wwf-indonesia@wwf.or.id	Via Email	31 March 2023	-	✓
14	Walhi	Jakarta Selatan City, DKI Jakarta Province	informasi@walhi.or.id	Via Email	31 March 2023	-	✓
15	AMAN	Jakarta Selatan City, DKI Jakarta Province	rumahaman@cbn.net.id	Via Email	31 March 2023	-	✓

Appendix 2. Assessment Program

DATE	10 – 15 April 2023	
PLANNED TIME (WIB/WITA)	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 10 April 2023		
04.55 – 11.25	Jakarta → Samarinda → Berau (ID 6672 & IW 1486)	All Auditor
12.00 – 18.00	From the airport to the audit location	All Auditor
Tuesday, 11 April 2023		
08.00 – 09.00	Opening Meeting <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	All Auditor, Management Representative PT DSN
09.00 – 12.00	<ul style="list-style-type: none"> Stakeholders consultation to related agencies Stakeholder consultation to affected communities surrounding the plantations, indigenous peoples, local communities and previous land owners. Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Smallholders, Third Party Supplier (if any), local NGO (if any) 	HAW, FIT HAW, FIT
09.00 – 12.00	Field Observation to Kemitraan 9 <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	RAB SEP
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	<ul style="list-style-type: none"> Continuing stakeholder consultation (if anything was not done the previous day) Document Verification 	All Auditor
16.30 – 17.00	submission of audit progress	All Auditor
Wednesday, 12 April 2023		
07.00 – 12.00	Field Observation to Long Teman Estate <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	SEP, HAW SEP, HAW
07.00 – 12.00	Field Observation to Kemitraan 7 <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, 	RAB

DATE	10 – 15 April 2023	
PLANNED TIME (WIB/WITA)	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect <ul style="list-style-type: none"> Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	FIT
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	Field observation to Palm Oil Mill 7 <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge) Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect, security post, FFB Sorting, Processing Activity, Despatch CPO) Implementation of Environmental aspect, Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond & land application 	RAB SEP, HAW FIT
16.30 – 17.00	Penyampaian progres audit // <i>submission of audit progress</i>	All Auditor
Thursday, 13 April 2023		
08.00 – 12.00	<ul style="list-style-type: none"> Continuing stakeholder consultation (if anything was not done the previous day) Document Verification 	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	Document Verification	All Auditor
16.30 – 17.00	submission of audit progress	All Auditor
Friday, 14 April 2023		
08.00 – 11.30	<ul style="list-style-type: none"> Continuing field observation and stakeholder consultation (if anything was not done the previous day) Continue document verification and completing checklist 	All Auditor
11.30 – 14.00	Break	All Auditor
14.00 – 15.30	Interim Meeting (closing meeting preparation)	All Auditor
15.30 – 17.00	CLOSING MEETING <ul style="list-style-type: none"> Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timeline of CAR's, Conclusion) Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timeline of CAR's, Conclusion) 	All Auditor, Management Representative PT DSN
Saturday, 15 April 2023		
05.00 – 11.00	Travel from audit location to the airport	All Auditor
12.10 – 16.05	Berau – Balikpapan – Jakarta (IW 2363 & IU 603)	All Auditor