

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

**[✓] Surveillance 1.4**

Name of Management Organization : **Bumi Permai Mill & Rahayu Mill – PT Prima Mitrajaya Mandiri & PT Teguh Jayaprima Abadi Subsidiary of MP Evans Group PLC**

Plantation Name : PT Prima Mitrajaya Mandiri – Beringin Jaya Estate, Lembuswana Estate, Bumi Permai Estate, Prima Estate, Kahoi Estate; PT Teguh Jayaprima Abadi – Rahayu Estate, Mahakam Estate

Location : Benua Puhun Village and Rantau Humpang Village, Muara Kaman Sub District, Kutai Kartanegara District, Kalimantan Timur, Indonesia

Certificate Code : **MUTU-RSPO/062**

Date of Initial Registration : 26 June 2014

Date of Last Issued : 17 September 2019      Date of License Issue : 26 August 2023

Date of Certificate Expiry : 25 June 2024      Date of License Expiry : 25 June 2024

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.4	13 – 18 March 2023	Rizliani Aprianita Hasibuan (Lead Auditor), Asystasya Aishah Silalahi, Radityo Puspanjana, and Rizki Tanaya	Moh Arif Yusni	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.4	27 June 2023

**TABLE OF CONTENT**

**FIGURE**

Figure 1. Location Map of PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi	01
Figure 2. Operational Map of PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi	02
Abbreviations Used	03

**1.0 SCOPE of the CERTIFICATION ASSESSMENT**

1.1	Assessment Standard Used	05
1.2	Organization Information	05
1.3	Type of Assessment	05
1.4	Location of Mill and Plantations	05
1.5	Description of Area Statement	06
1.6	Planting Year and Cycle	07
1.7	Description of Mill and Supply Base	07
1.8	Estimate Tonnage of Certified Product	09
1.9	Other Certifications	10
1.10	Time-Bound Plan	10

**2.0 ASSESSMENT PROCESS**

2.1	Assessment Team	12
2.2	Assessment Methodology, Assessment Process and Locations of Assessment	12
2.3	Stakeholder Consultation and Stakeholders Contacted	18
2.4	Determining Next Assessment	18

**3.0 ASSESSMENT FINDINGS**

3.1	Summary of Assessment Report of the RSPO Certification	19
3.2	Conformity Checklist of Certificate and Logo Use	85
3.3	Summary of RSPO Partial Certification	87
3.4	Identification of Findings, Corrective Actions, Observations, Opportunity for Improvement and Noteworthy Positive Components	88
3.5	Summary of Arising Issues from Public and Auditor Responses	93

**4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY**

4.1	Formal Signing of Assessment Findings	97
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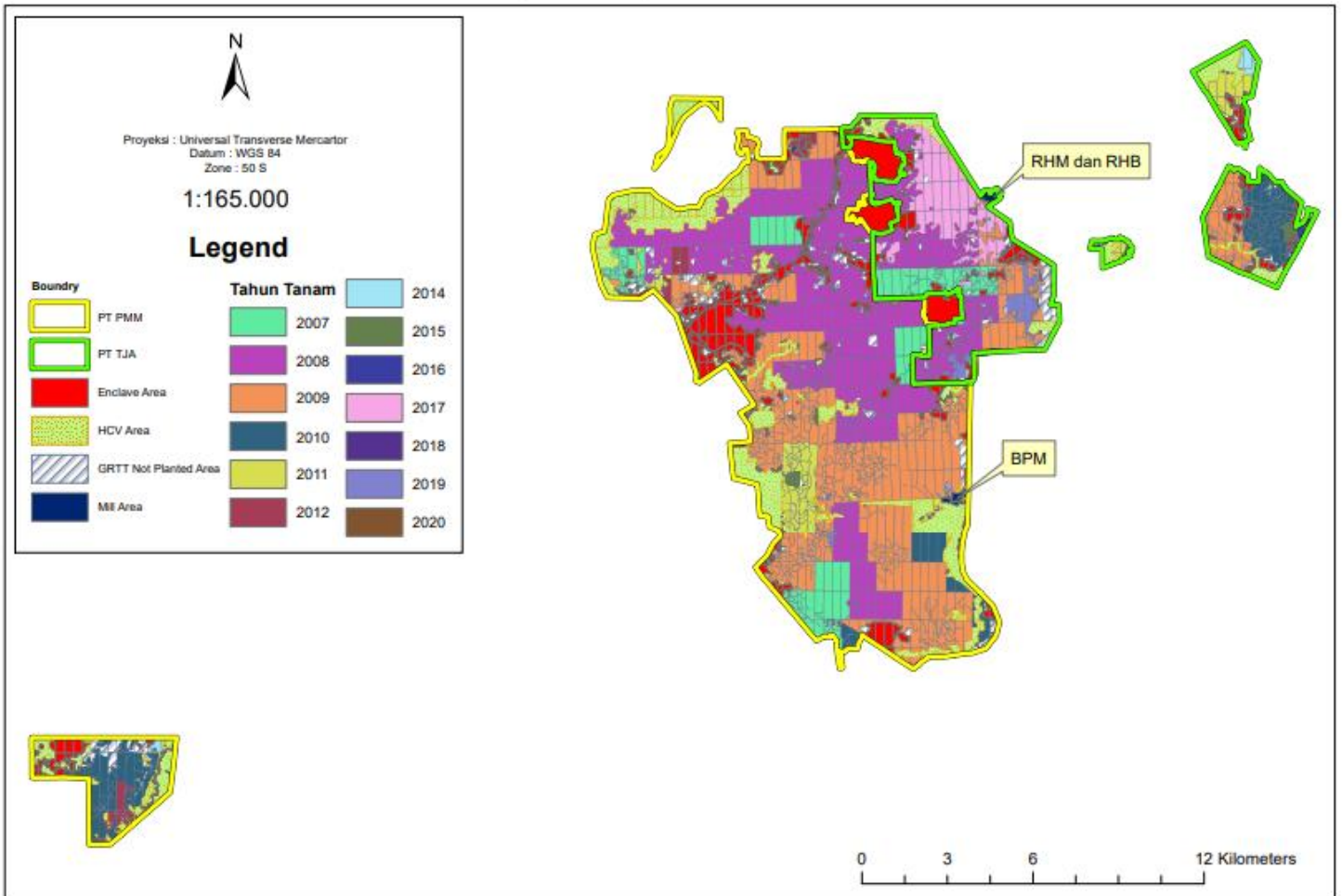
**APPENDICES**

1.	List of Stakeholders Contacted in the RSPO Certification Process	98
2.	Assessment Program	100

Figure 1. Location Map of PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi



Figure 2. Operational Map of PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi



**Abbreviations Used**

ASA	:	Annual Surveillance Assessment
BJE	:	Beringin Jaya Estate
BKSDA	:	<i>Badan Konservasi Sumber Daya Alam</i>
BPE	:	Bumi Permai Estate
BPJS	:	<i>Badan Pelayanan Jaminan Sosial</i>
CH	:	Certificate Holder
CLA	:	<i>Collective Labor Agreement</i>
CPO	:	Crude palm oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate social responsibility
DPMPTSP	:	<i>Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu/ One Stop Investment and Services Office</i>
EFB	:	Empty Fruit Bunch
EIA	:	Environmental Impact Assessment
EHS	:	Environmental Health & Safety
FFB	:	Fresh Fruit Bunch
FGD	:	Forum Group Discussion
FMIS	:	Financial Management Information System
FR	:	Frequency Rate
GCOHS	:	Guiding Committee of Occupational Health & Safety
GHG	:	Green-house Gas
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha (Land Use Title)</i>
HRD	:	Human Resources Department
ILO	:	International Labour Organization
ISCC	:	International Sustainability & Carbon Certification
ISPO	:	Indonesian Sustainable Palm Oil
ISO	:	International Standard Organization
IPM	:	Integrated Pest Management
IU	:	Immature Upkeep
IUP	:	<i>Izin Usaha Perkebunan (Plantation Business Permit)</i>
KEPMENAKERTRANS	:	<i>Keputusan Menteri Tenaga Kerja &amp; Transmigrasi (Decision of Labor Agency).</i>
KER	:	Kernel Extraction Rate
KHE	:	Kahoi Estate
KSU	:	<i>Koperasi Serba Usaha (Cooperative)</i>
KTP	:	<i>Kartu Tanda Penduduk (ID Card)</i>
KUD	:	<i>Koperasi Unit Desa (Cooperative of Village)</i>
LD50	:	Lethal Dosage 50
LTA	:	Lost Time Accident
MDP	:	Management Development Program
MKE	:	Mahakam Estate
MSDS	:	Material Safety Data Sheet
MU	:	Mature Upkeep
NGO	:	Non-Government Organization
NPP	:	New Planting Procedure
LLE	:	Lembuswana Estate
LSU	:	Leaf Sampling Unit
OER	:	Oil Extraction Rate
OFI	:	Opportunity for Improvement

OHS	:	Occupational Health & Safety
OPT	:	<i>Organisme Pengganggu Tanaman/ plant pests</i>
P2K3	:	<i>Panitia Pembina Keselamatan &amp; Kesehatan Kerja (Committee of OHS)</i>
PIC	:	Person In Charge
PK	:	Palm Kernel
PKWT	:	Perjanjian Kerja Waktu Tertentu ( <i>Contract workers</i> )
PME	:	Prima Estate
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PT KAJ	:	PT Kutai Agro Jaya
PT PMM	:	PT Prima Mitrajaya Mandiri
PT TJA	:	PT Teguh Jayaprima Abadi
RHE	:	Rahayu Estate
RKL-RPL	:	<i>Rencana Kelola Lingkungan – Rencana Pantau Lingkungan (Environmental Management &amp; Monitoring Plan)</i>
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened, and Endangered
SCCS	:	Supply Chain Certification Standard
SIA	:	Social Impact Assessment
SKU	:	Permanent Worker
SKU H	:	<i>Satuan Unit Kerja Harian / Daily Work Unit</i>
SKU B	:	<i>Satuan Unit Kerja Bulanan/ Monthly Work Unit</i>
SOP	:	Standard Operation Procedure
SSU	:	Soil Sampling Unit
TPH	:	<i>Tempat Pengumpulan Hasil / result collection point</i>
UPDKS	:	<i>Ulat Pemakan Daun Kelapa Sawit/ caterpillars that eat palm leaves</i>
WBS	:	Whistle Blower System
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treat Plant

<b>1.0</b>	<b>SCOPE OF THE CERTIFICATION ASSESSMENT</b>		
<b>1.1</b>	<b>Assessment Standard Used</b>		
		<ul style="list-style-type: none"> <li>• <i>Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020.</i></li> <li>• <i>RSPO Certification Systems for Principles &amp; Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.</i></li> </ul>	
<b>1.2</b>	<b>Organisation Information</b>		
1.2.1	Organization name listed in the certificate	PT PRIMA MITRAJAYA MANDIRI, PT TEGUH JAYAPRIMA ABADI – MP EVANS GROUP PLC.	
1.2.2	Contact person	Donald P. Ginting	
1.2.3	Organisation address and site address	RSPO registered company: Gedung Graha Aktiva Lt. 10, Jl. HR Rasuna Said Kav. 03 Blok X-1, Kuningan, Jakarta Selatan.	
1.2.4	Telephone	021-52920338	
1.2.5	Fax	021-52920339	
1.2.6	E-mail	donaldp@mpevans.co.uk	
1.2.7	Web page address	<a href="https://www.mpevans.co.uk/">https://www.mpevans.co.uk/</a>	
1.2.8	Management Representative who completed the application for certification	Sivabalan Subbiah (Head of Operation Agronomy Kaltim)	
1.2.9	Registered as RSPO member	1-0027-06-000-00 dated 08 October 2006.	
<b>1.3</b>	<b>Type of Assessment</b>		
1.3.1	Scope of Assessment and Number of Management Unit	<ul style="list-style-type: none"> <li>• <b>PT Prima Mitrajaya Mandiri</b> (Bumi Permai Mill, Beringin Jaya Estate, Kahoi Estate, Lembuswana Estate, Bumi Permai Estate; Prima Estate)</li> <li>• <b>PT Teguh Jayaprima Abadi</b> (Rahayu Mill, Rahayu Estate and Mahakam Estate)</li> <li>• <b>Scheme smallholders</b> ; Subur Makmur Cooperative, Grenseng Indah Cooperative, Mitra Sawit Mandiri Cooperative, Maju Membangun Cooperative, Sawit Etam Bersama Cooperative, Tanah Sama Cooperative, Tanah Sama Cooperative, Karya Bersama Cooperative and Mitra Sejahtera Cooperative.</li> </ul>	
1.3.2	Type of certificate	Single	
<b>1.4</b>	<b>Locations of Mill and Plantation</b>		
1.4.1	<b>Location of Mill</b>		
	<b>Name of Mill</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	Bumi Permai Mill	Benua Puhun Village, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia.	S 0° 17' 54.1"      E 116° 45' 46.6"
	Rahayu Mill	Rantau Hemplang, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia.	S 0° 12' 12.73"      E 116° 46' 20.69"
1.4.2	<b>Location of Certification Scope of Supply Base</b>		
	<b>Name of Supply Base</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	PT PMM		

Beringin Jaya Estate	Bukit Jering and Lebak Mantan Village, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia	S 00° 13' 04"	E 116° 41' 20"
Subur Makmur Cooperative (399 SH)			
Grenseng Indah Cooperative (90 SH)			
Kahoi Estate	Muara Kaman Hilir Village, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia	S 00° 12' 14"	E 116° 42' 54"
Mitra Sawit Mandiri Cooperative (1,087 SH)			
Lembuswana Estate	Loleng and Lebaho Ulak Village, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia	S 00° 18' 30.44"	E 116° 43' 9.34"
Maju Membangun Cooperative (1,184 SH)			
Sawit Etam Bersama Cooperative (612 SH)			
Bumi Permai Estate	Benua Puhun Village, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia	S 00° 17' 25.69"	E 116° 44' 21.14"
Tanah Sama Cooperative (652 SH)			
Prima Estate	Loleng Village, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia	S 00° 16' 15"	E 116° 44' 02"
<b>PT TJA</b>			
Rahayu Estate	Rantau Hempang Village, Muara Kaman Sub-District, Kutai Kartanegara Districts, Kalimantan Timur Province, Indonesia	S 00° 13' 01"	E 116° 46' 09"
Karya Bersama Cooperative (815 SH)			
Mahakam Estate	Bunga Jadi Village, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia	S 00° 12' 03"	E 116° 52' 03"
Mitra Sejahtera Cooperative (151 SH)			
<b>1.5</b>	<b>Description of Area Statement</b>		
1.5.1	Tenure		
	• State		<b>20,522.20 Ha</b>
	• Community		<b>- Ha</b>
	<b>Total</b>		
	* Area that already has HGU/HGB is 11,158.96 Ha and 9,363.24 Ha does not yet have a land title		
	*There is an addition of 14.90 Ha from the previous assessment due to the addition of HGB for Rahayu Mill		
1.5.2	<b>Area Statement</b>		



Description	PT PMM (Ha)	PT TJA (Ha)	Plasma (Ha)	TOTAL (Ha)
<b>Total area</b>	<b>11,412.28</b>	<b>4,319.26</b>	<b>4,790.66</b>	<b>20,522.20</b>
Production area	7,392.71	3,107.63	3,984.38	14,484.72
Immature area	2.22			
Mill	24.42	14.90	-	39.32
Emplacement, Road, etc.	510.63	129.80	144.40	784.83
Occupation	1,325.41	298.97	661.88	2,286.26
HCV MEC	1,702.93	625.53	-	2,328.46
Conservation area MEC	453.96	142.44	-	596.40

\*There is an HCV of 133.15 inside planted area and 110.31 Ha inside occupation area so the total HCV is 2,571.92 Ha

\*There is Rahayu Bulking inside PT PMM for an area 25.31 Ha and Bumi Permai Mill for an area 12.23 Ha.

**1.6 Planting Year and Cycles**
**1.6.1 Age profile of planting year**

Planting Year	PT PMM	PT TJA	Plasma	TOTAL (Ha)
<b>Mature</b>				
2007	576.31	378.82	312.75	1,267.88
2008	3,425.36	628.20	1,119.83	5,173.39
2009	2,680.76	613.47	1,621.08	4,915.31
2010	654.86	325.10	130.30	1,110.26
2011	-	213.5	357.84	571.34
2012	-	-	209.20	209.20
2014	17.86	-	59.98	77.84
2015	-	-	82.18	82.18
2016	-	-	39.38	39.38
2017	23.70	824.06	-	847.76
2018			4.00	4.00
2019	13.86	124.48	47.84	186.18
<b>Sub Total Mature</b>	<b>7,392.71</b>	<b>3,107.63</b>	<b>3,984.38</b>	<b>14,484.72</b>
<b>Immature</b>				
2020	2.22	-	-	2.22
<b>Sub Total Immature</b>	<b>2.22</b>	<b>-</b>	<b>-</b>	<b>144.56</b>
<b>TOTAL</b>	<b>7,394.93</b>	<b>3,107.63</b>	<b>3,984.38</b>	<b>14,486.94</b>

**1.6.2 New Planting area after January 2010**

1,162.77 Ha

**1.6.3 Planting Cycle**

1<sup>st</sup> Cycle

**1.7 Description of Mill and Supply Base**
**1.7.1 Description of Mill**

Name of Mill	Capacity (tonnes/hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
			Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
Bumi Permai Mill	60	300,489.55	70,133.07	23.34	15,242.26	5.07
Rahayu Mill	60	200,246.82	42,289.21	21.12	8,210.93	4.10

\*Production data source from 12months before assessment (March 2022 to Feb 2023)

**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			
					BPM		RHM	
					FFB	%	FFB	%

					(ton/year)		(ton/year)	
<b>PT PMM</b>								
Beringin Jaya Estate	3,229.08	1,304.73	19,390.64	14.86	19,298.07	99.52	75.58	0.39
• Subur Makmur Cooperative (399 SH)	468.48	401.48	6,094.13	15.18	6,094.13	100.00	-	
• Grenseng Indah Cooperative (90 SH)	149.59	149.59	4,474.55	29.91	4,474.55	100.00	-	
Kahoi Estate	1,748.96	1,407.01	33,346.59	23.70	33,228.87	99.65	54.17	0.16
• Mitra Sawit Mandiri Cooperative (1,087 SH)	1,106.97	949.39	16,492.09	17.37	16,470.82	99.87	21.27	0.13
Lembuswana Estate	1,832.83	1,236.57	28,418.40	22.98	28,347.00	99.75	71.40	0.25
• Maju Membangun Cooperative (1,184 SH)	625.85	568.64	12,932.90	22.74	12,932.90	100.00	-	
• Sawit Etam Bersama Cooperative (612 SH)	180.00	180	5,254.70	29.19	5,256.29	100.03	-	
Bumi Permai Estate	1,750.25	1,140.15	20,119.03	17.65	20,066.38	99.74	52.65	0.26
• Tanah Sama Cooperative (652 SH)	1,365.19	967.11	21,059.77	21.78	21,055.05	99.98	4.72	0.02
Prima Estate	2,851.16	2,304.25	58,007.82	25.17	57,929.81	99.87	78.01	0.13
<b>PT TJA</b>								
Rahayu Estate	2,960.07	2,246.33	44,511.19	19.82	28,612.98	64.28	15,755.21	35.40
• Karya Bersama Cooperative (815 SH)	658.58	565.1	11,690.01	20.69	10,094.52	86.35	1,595.49	13.65
Mahakam Estate	1,359.19	861.3	17,522.31	20.34	15,825.48	90.32	1,700.71	9.71
• Mitra Sejahtera Cooperative (151 SH)	236.00	203.07	3,163.01	15.89	2,896.66	91.58	262.48	8.30
<b>TOTAL</b>	<b>20,522.20</b>	<b>14,484.72</b>	<b>302,477.14</b>	<b>20.88</b>	<b>282,583.52</b>	<b>93.42</b>	<b>19,671.69</b>	<b>6.50</b>
*Production data source from 13 months before assessment (March 2022 – Feb 2023)								
*There are difference between total FFB production and FFB supply to mill due to difference weighing tool in estate and mill.								
1.7.3	FFB description from other source (Bumi Permai Mill)							
	<b>Name of sources/Organization (non-certified)</b>	<b>Type of Organization</b>	<b>Number of smallholders</b>	<b>Production Area (Ha)</b>	<b>FFB Supplied to Mill (MT)</b>			
					<b>BPM</b>	<b>RHM</b>		
	Maju Membangun Cooperative	Associated Smallholder PT PMM	-	-	2,290.58	-		
	Sawit Etam Bersama Cooperative		-	-	4,357.92	-		
	Tanah Sama Cooperative		-	-	4,045.73	-		
	Other suppliers	Outgrower and independent outgrower	-	-	7,326.33	180,541.56		
	<b>Total</b>				<b>18,020.55</b>	<b>180,541.56</b>		
*Production data source from 13 months before assessment (March 2022 – Feb 2023)								

1.7.4	Product categories	FFB, CPO, PK			
<b>1.8</b>	<b>Tonnage of Product</b>				
1.8.1	Past Annual Claim Certified Product	Last Year Projected Certified Volume (MT)		Actual Production (MT) of previous audit (March 2022 to Feb 2023)	
		BPM	RHM	BPM	RHM
	FFB Processed	333,459	63,000	282,583.17	19,671.69
	CPO Production	77,860	13,860	68,208.12	3,215.86
	Palm Kernel (PK) Production	16,964	3,150	12,730.24	533.56
1.8.2	<b>Product selling</b>				
	Type of selling product	Actual selling product for last year (March 2022 to Feb 2023) (MT)			
		BPM		RHM	
	CSPPO sold as RSPO certified product	27,501.17		-	
	CSPK sold as RSPO certified product	12,066.15		250.00	
	CSPPO sold under another scheme	39,602.92		3,000.32	
	CSPK sold under another scheme	-		-	
	CSPPO sold as conventional	-		-	
	CSPK sold as conventional	-		-	
*Bumi Permai Mill					
1.8.3	<b>Estimate of Certified FFB Claim</b>				
	<b>Name of Estates</b>	<b>Total Area (Ha)</b>	<b>Production Area (Ha)</b>	<b>FFB (tones/year)</b>	<b>Yield (tones/ha/year)</b>
<b>PT PMM</b>					
	Beringin Jaya Estate	3,229.08	1,304.73	20,300	15.56
	• Subur Makmur Cooperative (399 SH)	468.48	401.48	6,400	15.94
	• Grenseng Indah Cooperative (90 SH)	149.59	149.59	4,700	31.42
	Kahoi Estate	1,748.96	1,407.01	34,900	24.80
	• Mitra Sawit Mandiri Cooperative (1,087 SH)	1,106.97	949.39	17,300	18.22
	Lembuswana Estate	1,832.83	1,236.57	29,800	24.10
	• Maju Membangun Cooperative (1,184 SH)	625.85	568.64	13,600	23.92
	• Sawit Etam Bersama Cooperative (612 SH)	180.00	180	5,000	27.78
	Bumi Permai Estate	1,750.25	1,140.15	21,100	18.51
	• Tanah Sama Cooperative (652 SH)	1,365.19	967.11	22,100	22.85
	Prima Estate	2,851.16	2,304.25	60,900	26.43
	<b>Sub Total</b>	<b>15,308.36</b>	<b>10,608.92</b>	<b>236,100</b>	<b>22.25</b>
<b>PT TJA</b>					
	Rahayu Estate	2,960.07	2,246.33	30,100	13.40
	• Karya Bersama Cooperative (815 SH)	658.58	565.1	10,600	18.76
	Mahakam Estate	1,359.20	861.3	16,600	19.27

• Mitra Sejahtera Cooperative (151 SH)	236.00	203.07	3,000	14.77
<b>Sub Total</b>	<b>5,213.85</b>	<b>3,875.80</b>	<b>60,300</b>	<b>15.56</b>
<b>Total</b>	<b>20,522.20</b>	<b>14,484.72</b>	<b>296,400</b>	<b>20.46</b>

\*Projected FFB production for 12 months

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 (%)	
Bumi Permai	60	<b>236,100</b>	74,100	25.00	16,300	5.5	MB
Rahayu	45	<b>60,300</b>	13,800	23.00	3,000	5	MB

\*Projected FFB production for 12 months

1.9 **Other Certifications**

ISO 9001:2008	-
ISO 14001: 2004	-
OHSAS 18001:2007	-
ISCC	EU-ISCC-Cert-DE119-62225724
Others	MUTU-ISPO/076

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				
Pangkatan	2012	Pangkatan Estate (PT Pangkatan Indonesia)	2012	Labuhanbatu, North Sumatera	Certified
		Sennah Estate (PT Sembada Sennah Maju)	2012	Labuhanbatu, North Sumatera	Certified
		Bilah Estate (PT Bilah Plantindo)	2012	Labuhanbatu, North Sumatera	Certified
Bumi Permai	2013	PT Prima Mitrajaya Mandiri	2013	East Kutai, East Kalimantan	Certified
		Koperasi Subur Makmur	2013	East Kutai, East Kalimantan	Certified
		Koperasi Sawit Etam Bersama	2013	East Kutai, East Kalimantan	Certified
		Koperasi Tanah Sama	2013	East Kutai, East Kalimantan	Certified
		Koperasi Mitra Sawit Mandiri	2013	East Kutai, East Kalimantan	Certified
		Koperasi Grenseng Indah	2013	East Kutai, East Kalimantan	Certified
		Koperasi Maju Membangun	2013	East Kutai, East Kalimantan	Certified
		PT Teguh Jaya Prima Abadi	2013	East Kutai, East Kalimantan	Certified
		Koperasi Karya Bersama	2013	East Kutai, East Kalimantan	Certified
		Koperasi Mitra Sejahtera Abadi	2013	East Kutai, East Kalimantan	Certified

Rahayu	2022	PT Teguh Jaya Prima Abadi	2013	East Kutai, East Kalimantan	Certified (Currently supply FFB to Bumi Permai Mill)
		Koperasi Karya Bersama	2013	East Kutai, East Kalimantan	
		Koperasi Mitra Sejahtera Abadi	2013	East Kutai, East Kalimantan	
		Koperasi Maju Membangun II	2023	East Kutai, East Kalimantan	Have not obtained the HGU
		Koperasi Sawit Etam Bersama II	2023	East Kutai, East Kalimantan	Have not obtained the HGU
		Koperasi Tanah Sama II	2023	East Kutai, East Kalimantan	Have not obtained the HGU
Benuang	2023 Non-Certified (Commissioning 2021)	PT Bumi Mas Agro	2023	East Kutai, East Kalimantan	Non-Certified (Currently send FFB to outsider mill)
		Koperasi Dugai Jaya Mandiri	2023	Kalimantan	
		Koperasi Marukangan Sejahtera Mandiri	2023	Kalimantan	
		Koperasi Jaya Harapan Bersama	2023	Kalimantan	
Tengkalat	2017	PT Gunung Pelawan Lestari	2017	Bangka	Certified
		Koperasi Ikhtiar Sejahtera	2017	Bangka	Certified
		Koperasi Silip Lestari	2017	Bangka	Certified
		Koperasi Mapur Mandiri	2017	Bangka	Certified
		Koperasi Gunung Muda Sejahtera	2017	Bangka	Certified
-		PT Evans Lestari	2023	Musirawas, South Sumatera	Currently FFB delivered to outside mill
-		PT Simpang Kiri Plantation Indonesia	2023	Aceh	Currently FFB delivered to outside mill
Note: TBP approved by Evans Group on 3 October 2022					
1.10.2	<b>Progress of Associated Smallholders and Out growers for Certifiable Standard</b>				
Smallholder under PT PMM (Koperasi Sawit Etam Bersama – Tahap II, Koperasi Maju Membangun – Tahap II, Koperasi Tanah Sama – Tahap II) currently is in progress of land use title issuance.					

2.0	<b>ASSESSMENT PROCESS</b>
2.1	<b>Assessment Team</b>
ASA-1.4	<ol style="list-style-type: none"> <li>1. <b>Rizliani Aprianita Hsb (Lead Auditor)</b>. Indonesian Citizen. Bachelor and Magister of Agribusiness, Faculty of Agriculture. She had followed training such as RSPO Lead Auditor Training, SCCS training, lead Auditor ISO 9001:2008, ISO 14001:2004, SA 8000, OHSAS 18001, social audit training by RSPO (verité), ISPO Auditor training and followed several IHT related to environment, BMP etc. She has been involved in several audit activities related to sustainable palm oil certification since 2015 covering legal, social aspect, health and safety aspect, worker welfare, waste management aspect etc. In this audit, she assigned to verify worker welfare, transparency and social aspects.</li> <li>2. <b>Asystasya Aishah Silalahi (Auditor)</b>. Indonesia Citizen, Bachelor of Economy, Major of Agribusiness, Faculty of Economic and Management. She has one year experience in consultancy. She has followed training such as ISPO Auditor Training, Lead Auditor ISO 9001:2015, OHS General Expert, RSPO lead auditor training course, SCCS, and several in house training related to environmental, BMP, SA 8000. Has been involved in several audit activities since 2016 related to sustainable palm oil certification covering waste management aspect, Social Aspect, Health and Safety Aspect, and Worker Welfare. During this audit, she verified legal, land dispute, and SCCS aspect.</li> <li>3. <b>Radityo Puspanjana (Auditor)</b>. Indonesian Citizen. Bachelor of agriculture, majoring in Soil Science. Agriculture Faculty. He was working as honorarium Officer at the Riau Province Plantation Agency in the division of huge estate for 1 year. The participated trainings are Survey and Mapping (GIS) Training which was held by National GMIT, ISPO auditor training, ISO 9001/2008 auditor training, ISO 14001/2004 auditor training, IHT Geospatial Information System, IHT High Conservation Value, IHT Environmental Impact Assessment, IHT Green House Gas and RSPO Lead Auditor Course by Checkmark Training. Since 2015 has been following many audits as auditor base on Best Management Practice and Environment. In this audit he is responsible for assessing the aspects of Environment, HCV, Social, and GHG Aspects.</li> <li>4. <b>Rizki Tanaya (Trainee Auditor)</b>. Indonesian citizen, Bachelor of Agriculture, Majoring Socio–Economic Agriculture, Padjadjaran University. Training that has been attended include ISPO Auditor Training and Refreshment New ISPO Ministry of Agriculture 38 of 2020, RSPO SCCS Auditor Training, RSPO P&amp;C Lead Auditor Training, ISO 9001:2015 Lead Auditor Training, General OHS Expert Training, ISO 19011:2018, ISO 17021:2015, ISO 17065:2012, ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, ISO 50001:2018, FSC CoC, BAP, SEDEX/SMETA, and Global GAP. Has carried out several audit activities on environmental, conservation, Best Management Practices, OHS, Labor and Social aspects. In this audit activity, he is verification is carried out on aspects of Best Management Practices and OHS Aspect. He is under supervising Lead Auditor.</li> </ol> <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.</p>
2.2	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
2.2.1	<b>Figure of person days to implement assessment</b>
ASA-1.4	<p>Number of auditors: 3 auditors and 1 auditor trainee          Number of days for Remote <b>ASA-1.4</b>: 6 days          Number of working days for Remote <b>ASA-1.4</b>: 18 Working days.</p>
2.2.2	<b>Assessment Process</b>
ASA-1.4	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT PMM and PT TJA to the requirements of <b>Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th April 2020 and RSPO Certification Systems for Principles &amp; Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.</b></p> <p>The scope of certification of Bumi Permai Mill and Rahayu Mill FFB supplied by seven (7) Estates and 8 scheme smallholders: 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</p>

	<p>implementation on site.</p> <p>Some opportunities for improvement of the results ASA-1.4 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (Recert). Improvement of findings from ASA-1.2 &amp; 1.3 findings were observed by auditors at this ASA-1.4 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.4.</p> <p>The opening meeting was held on 13 March 2023. As for the participants who attended the opening meeting included Plantation Controller, General Manager, Estate and Mill Managers, Support Team from Jakarta and other staff at PT PMM &amp; PT TJA. Closing meeting was held on 18 March 2023 attended by the same participants as the opening meeting. Management PT PMM &amp; PT TJA accept all the onsite surveillance 1.4 audit results.</p> <p>The assessment program please find Appendix 2.</p>
<p><b>2.2.3</b></p>	<p><b>Locations of Assessment</b></p>
<p><b>ASA-1.4</b></p>	<p>The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p><b>Rahayu Mill</b></p> <ul style="list-style-type: none"> <li>• <b>Chemical material warehouse.</b> Field observations related to the fulfilment of health safety as well as interviews with a warehouse clerk of safety health.</li> <li>• <b>Mill Drainage.</b> Observations mill effluent lines, sanitation mill and flow of leaching mill.</li> <li>• <b>Hazardous waste temporary warehouse.</b> Field observations related to the fulfilment of the attribute's health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse.</li> <li>• <b>Solid Waste.</b> Observation of the management of Solid waste consist of EFB, fiber and shell from the production process of mill.</li> <li>• <b>WWTP.</b> Field observations related to Ban to entry to WWTP, run off, testing of effluent.</li> <li>• <b>Biogas Plant.</b> Observation and interview related to waste water utilization for methane capture, currently the captured gas is 100 percent in flaring.</li> <li>• <b>Security post.</b> Interview with 2 securities related to work procedure, emergency response, worker welfare, OHS implementation in mill, and supply chain aspect.</li> <li>• <b>Weighbridge station.</b> Interview with 2 workers related to supply chain aspect and worker welfare.</li> <li>• <b>Grading station.</b> Interview with 1 worker related to work procedure, emergency response, worker welfare, and OHS implementation in mill.</li> <li>• <b>WTP.</b> Observations and interviews related to water management, recording of water use, health checks, PPE and waste management</li> <li>• <b>Loading Ramp Station.</b> Observations and interviews related work procedure, safety aspect, worker welfare etc.</li> <li>• <b>Sterilizer Station.</b> Observations and interviews related work procedure, safety aspect, worker welfare etc.</li> <li>• <b>Engine Room.</b> Observation related work procedure, safety aspect, worker welfare, environment aspect etc.</li> <li>• <b>Boiler Station.</b> Observation and interviews related work procedure, safety aspect, worker welfare etc</li> <li>• <b>Press Station.</b> Observation and interviews related work procedure, safety aspect, worker welfare etc.</li> <li>• <b>Nut and Kernel Station.</b> Observation and interviews related work procedure, safety aspect, worker welfare etc.</li> <li>• <b>Oil Tank Station.</b> Observation's safety aspect, environment aspect etc.</li> <li>• <b>Workshop.</b> Observation and Interview related to work procedure, OHS and workers welfare aspect.</li> <li>• <b>Empty Bunch Area.</b> Observation related to waste management.</li> <li>• <b>Hydrant Test.</b> Simulation related to fire emergency respond.</li> </ul>

**Bulking**

- **Weighbridge.** Observations and interview regarding product acceptance from BPM and RHM
- **Administration of production and sales records.** Observations and interviews regarding recording production and recording sales volume
- **CPO Storage Tanks.** Observation of CPO storage capacity in bulking.

**Bumi Permai Mill**

- **Composting station.** Observation of the management of EFB from the production process of mill to composting.
- **WWTP.** Field observations and interview related to Ban to entry to WWTP, run off, testing of effluent.
- **Reservoir.** Field observations related management and monitoring water source for mill process.
- **Biogas plant.** Field observations related to POME management for biogas.
- **Land Application block R33.** Observation related to effluent handling and environment aspect etc.
- **Hazardous waste storage.** Observation about hazardous waste kept in storage, emergency response, and hazardous waste management
- **Chemical storage.** Observation about chemical material stock, OHS implementation, MSDS, and hazardous waste management and interview with storage keeper about worker welfare, OHS implementation, and facilities for worker.
- **WTP.** Observation about WTP condition and interview with worker related OHS implementation, worker welfare, and waste management.
- **Material storage.** Observation about PPE stock and other material in the storage.
- **Weighbridge station.** Interview with worker related to supply chain process, FFB source from certified and uncertified area, and worker welfare.
- **Loading Ramp Station.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **Sterilizer Station.** Observations and interviews related work procedure, safety aspect, worker welfare etc.
- **Engine Room.** Observation related work procedure, safety aspect, worker welfare, environment aspect etc.
- **Boiler Station.** Observation and interviews related work procedure, safety aspect, worker welfare etc
- **Press Station.** Observation and interviews related work procedure, safety aspect, worker welfare etc.
- **Nut and Kernel Station.** Observation and interviews related work procedure, safety aspect, worker welfare etc.
- **Oil Tank Station.** Observation's safety aspect, environment aspect etc.
- **Workshop.** Observation and Interview related to work procedure, OHS and workers welfare aspect.
- **Empty Bunch Area.** Observation related to waste management.
- **Hydrant Test.** Simulation related to fire emergency respond.

**Beringin Jaya Estate**

- **Hazardous waste temporary warehouse.** Field observations related to the fulfilment of the attribute's health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse.
- **Fertilizer Warehouse.** Observations relating to the implementation of storage hazardous material, Health safety and labor management.
- **Chemical material warehouse.** Field observations related to the fulfilment of health safety as well as interviews with a warehouse clerk of safety health.
- **Fire Fighting Equipment Storage.** Simulation the function of fire extinguishers and team readiness.
- **Workshop.** Observations and interviews with workers related to the management and implementation of health safety, and social worker.
- **Body shower of spraying team and mixing area.** Observation the conditions body shower room and PPE handling.
- **Domestic Waste Landfill, Block I 12.** Observation on domestic waste management.
- **HGU stakes and land demarcation No. PMM 01, No. PMM 02 and No. PMM D39C.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.



- **HCV Keham River Riparian Area, Block I15.** Observation the implementation of management in HCV of riparian area.
- **Housing Complex G3.** Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.
- **Day care.** Observation and interview with worker related labor aspect and OHS.
- **Generator (Electricity).** Observation for waste management, and interviews related to workers facility, electricity, domestic waste, sources of fresh water, socialization of company policy and complaint mechanism.
- **Diesel Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Harvesting and loose friut picker block K10.** Observation and interview with Harvesting Supervisor and workers related to harvesting procedure accordance to SOP, PPE implementation, employment aspect, OHS implementation, socialization HCV area, and payment system.
- **HGU Pole No. 11, 14 and 78.** Observation the conditions and position of legal boundary
- **HCV Block F08.** Observations and interviews on HCV management and monitoring.
- **Firefighting tower block G13.** Observation about condition the firefighting facilities and equipment.
- **Reverse Osmosis house.** Observations related to the provision of drinking water to workers
- **Hazardous waste storage (transit).** Observation and interview related to storage condition, hazardous waste stock, emergency response facility, waste management and employment
- **Agrochemical storage.** Observation about storage condition, chemical stock, and interview with storage keeper about their job description, manpower aspect, and OHS implementation.
- **Fertilizer storage.** Observation about storage condition, fertilizer stock, and interview with storage keeper about their job description, manpower aspect, and OSH implementation.
- **PPE warehouse and Mixing Area.** Observation and interviews related to washing of working tools, PPE spray teams and used pesticide containers handling.
- **Material Storage.** Observation and interview related material handling and PPE stock
- **Firefighting storage and simulation.** Observation about condition the firefighting facilities and equipment and Firefighting simulation.
- **Central Division housing. Block F20 – F21.** Observations regarding workers' welfare facilities, domestic waste management, and environmental aspects
- **Spraying Circle & Path, Block E09.** Observation and interviews of spraying mechanism, work tools, chemicals used, doses used, medical examinations, extra Food, PPE, labor aspect and environment.
- **Piezometer and Peat Subsidence. Block E10.** Observations and interviews regarding the management and monitoring of peat areas
- **FFB Harvesting and loose fruit picker activity, Division Tengah Block P41.** Observation and interviews with foreman and harvester related FFB quality, harvesting round, OHS, and employment.
- **Landfill Block F22.** Field observation related domestic waste management
- **Owl Barn. Block E09.** Observations on pest management.

**Grenseng Indah Cooperative**

- HGU stakes and land demarcation No. PLM MW 07, No. PLM MW 08 and No. PLM MW 09. Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **Pesticide Spraying, Block I13.** Observations and interviews related to work systems, pesticide filling, OSH and employment aspects.
- **Harvesting and loose friut picker block L08.** Observation and interview with Harvesting Supervisor and workers related to harvesting procedure accordance to SOP, PPE implementation, employment aspect, OHS implementation, socialization HCV area, and payment system.
- **Fire Tower. Block G12.** Observation of land fire monitoring and control facilities

**Subur Makmur Cooperative**

- **HGU Pole No. 12 and 18.** Observation the conditions and position of legal boundary
- **Manuring Activity, Block F10 (Plasma).** Observation and interviews of manuring mechanism, work tools, fertilizer used, fertilizer dosage, medical examinations, PPE, labor aspect and environment.

**Prima Estate**

- **Circle and Path Spraying block J32.** Observations and interviews regarding best work practices, environmental aspects, including OHS and Employment aspects
- **Manuring block K40.** Observations and interviews regarding best work practices, environmental aspects, including OHS and Employment aspects
- **Piezometer and Peat Subsidence.** Block E42. Observations and interviews regarding the management and monitoring of peat areas
- **Pesticide Application. Block J33.** Observations and interviews of the spraying mechanism, work tools, chemicals used, doses used, health checks, food additives, PPE, labor and environmental aspects.
- **Fertilization. Block J30.** Observations and interviews with workers regarding the best way of working, K3 aspects, and employment aspects.
- **Piezometer and Subside Benchmark. Block M40.** Observations and interviews on peat management
- **Harvest. Block K40.** Observations and interviews with foremen and harvesters regarding FFB quality, harvest cycle, K3, and employment.
- **HGU stakes and land demarcation No. T8, No. T7 and No. T6.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **Riparian River Block I25 & I26.** Observations marking of HCV areas (riparian river) and RTE information signboard, prohibition of burning, hunting and illegal logging of natural trees.
- **Day care block K35.** Observations and interviews with workers related to Employment aspects, facilities and infrastructure housing area.
- **Housing complex and Facilities (block K35).** Observation regarding facilities and infrastructure housing area.
- **Landfill block J36.** Observation related to waste management.
- **Reverse Osmosis house block K35.** Observations related to the provision of drinking water to workers
- **Fertilizer storage.** Observation related to storage condition, fertilizer stock, and interview with storage keeper related to job description, hazardous waste management, OHS implementation, and worker welfare aspect.
- **Chemical storage.** Observation about chemical material stock, OHS implementation, MSDS, and hazardous waste management and interview with storage keeper about worker welfare, OHS implementation, and facilities for worker
- **Rinse house and PPE storage.** Observation about waste management and OHS implementation.
- **Hazardous waste storage.** Observation about hazardous waste kept in storage, emergency response, and hazardous waste management
- **General storage.** Observation about PPE stock and other material in the storage
- **Oil storage.** Observation about oil stock, OHS implementation, and MSDS
- **Solar tank.** Observation about emergency response and secondary containment

**Rahayu Estate**

- **Spraying Activity Block G43.** Observation and interviews related OHS, BMP, Worker Welfare and Environment Aspects.
- **Manuring Activity Block F45.** Observation and interviews related OHS, BMP, Worker Welfare and Environment Aspects.
- **Harvesting Activity Block F48.** Observation and interviews related OHS, BMP, Worker Welfare and Environment Aspects.
- **Peat Subsidence Block E46.** Observation related peat management.
- **Slope Area Block I47.** Observation related slop area.
- **Owl Barn Block E47.** Observation related pest control using owls.
- **Land Fill Block F44.** Observation related domestic waste management.
- **Harvesting and loose friut picker block H55.** Observation and interview with Harvesting Supervisor and workers related to harvesting procedure accordance to SOP, PPE implementation, employment aspect, OHS implementation, socialization HCV area, and payment system.
- **HGU stakes and land demarcation No. 25, No. 022, No. 030, No. 031, No. 153, No. 152 and No. E7.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.

- **Occupation area block B42.** Observation of occupied areas, land boundaries and land has not compensated by the company.
- **Land Application Block G42.** Observations related to implementation management procedures of POME for land application.
- **HCV Forest Area, Block B41.** Observation the implementation of management in HCV of forest area.
- **Agrochemical storage.** Observation about storage condition, chemical stock, and interview with storage keeper about their job description, manpower aspect, and OHS implementation.
- **Fertilizer storage.** Observation about storage condition, fertilizer stock, and interview with storage keeper about their job description, manpower aspect, and OSH implementation.
- **Clinic.** Observation dan interview related to emergency response, medical facility, work accident, waste management and medical check-up.
- **PPE warehouse and Mixing Area.** Observation and interviews related to washing of working tools, PPE spray teams and used pesticide containers handling.
- **Material Storage.** Observation and interview related material handling and PPE stock
- **Hazardous Waste Storage.** Observation and interview related OHS, material handling, and hazardous waste management
- **Day care block F43.** Observations and interviews with workers related to Employment aspects, facilities and infrastructure housing area.
- **Housing complex and Facilities (block G48 and F43).** Observation regarding facilities and infrastructure housing area.
- **Landfill block F43.** Observation related to waste management.

**Karya Bersama Cooperative**

- HGU stakes and land demarcation No. KB 29 and No.KB 28. Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **FFB Harvesting and loose fruit picker activity, Block KB 21.** Observation and interviews with foreman and harvester related FFB quality, harvesting round, OHS, and employment.

**Mahakam Estate**

- **HGU stakes and land demarcation No. 69B, No. 69A and No. 49.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **Riparian Paseban River Block O50 & O51.** Observations marking of HCV areas (Paseban riparian river) and RTE information signboard, prohibition of burning, hunting and illegal logging of natural trees.
- **Fertilizer storage.** Observation about fertilizer stock, OHS implementation, MSDS, and hazardous waste management.
- **General storage.** Observation about PPE stock and other material in the storage.
- **Oil storage.** Observation about oil stock, OHS implementation, and MSDS.
- **Agrochemical storage.** Observation about agrochemical stock, OHS implementation, MSDS, and hazardous waste management and interview with storage keeper about worker welfare, OHS implementation, and facilities for worker.
- **Rinse house and PPE storage.** Observation about waste management and OHS implementation.
- **Hazardous waste storage.** Observation about hazardous waste kept in storage, emergency response, and hazardous waste management.
- **Solar tank.** Observation about emergency response and secondary containment.
- **Day care.** Interview with workers related to worker welfare aspect, facility for workers, and observation about emergency response in day-care.
- **Piezometer and Peat Subsidence. Block I52.** Observations and interviews regarding the management and monitoring of peat areas
- **Slashing Upkeep Block N53.** Observation and interviews of spraying mechanism, work tools, chemicals used, doses used, medical examinations, extra Food, PPE, labor aspect and environment.

**Mitra Sejahtera Cooperative**

	<ul style="list-style-type: none"> <li>• <b>HGU stakes and land demarcation PLM 18 dan No.PLM 19.</b> Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.</li> <li>• <b>FFB Harvesting and loose fruit picker activity, Block I51.</b> Observation and interviews with foreman and harvester related FFB quality, harvesting round, OHS, and employment.</li> </ul>
<b>2.3</b>	<b>Stakeholder Consultation and Stakeholders Contacted</b>
<b>2.3.1</b>	<b>Summary of stakeholder consultation process.</b>
<b>ASA-1.4</b>	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT PMM and PT TJA Mas was held by:</p> <ul style="list-style-type: none"> <li>• Public Notification on website on MUTU Website on 27 February 2023</li> <li>• Public consultation with NGOs (by email) such as WALHI, WWF, and Sawit Watch on 8 March 2023</li> <li>• Public consultation meeting with government institution 14 March 2023</li> <li>• Public consultation meeting with communities and Worker on 13 – 17 March 2023</li> <li>• Public consultation meeting with internal stakeholders and contractor 13 March 2023</li> </ul>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	<i>Please find appendix 1</i>
<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit (RC) will be conducted eight (8) months to twelve (12) months after date of annual license.

**3.0 ASSESSMENT FINDINGS**

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

MUTUAGUNG LESTARI has conducted an assessment of PT Prima Mitrajaya Mandiri and PT Teguh Jaya prima Abadi, MP EVANS Group PLC operation consisting of *two (2)* mill and *seven (7)* oil palm estates and *eight (8)* Scheme smallholders

During the assessment, there were *one (1)* Nonconformities were assigned against Major Compliance Indicator(s); *zero (0)* nonconformity(s) were assigned against Minor Compliance Indicators; and *four (4)* opportunity(s) for improvement were identified.

MUTUAGUNG LESTARI found that Bumi Permai Mill and Rahayu Mill – PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi, MP EVANS Group PLC complied with the requirements of **Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governor on 12th November 2020.**

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>	
<b>1.1</b>	<b>The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</b>
<b>1.1.1</b>	<p>The company has an SOP on Transparency of Information document number PMM/SOP/Umum-02 revision 1 dated 16 September 2013. The SOP explains the mechanism for communication with the public as well as a list of documents that can be accessed by all parties and limited documents. The following are examples of publicly accessible documents</p> <ul style="list-style-type: none"> <li>• Vision and mission of the company</li> <li>• Company policy</li> <li>• Company procedures</li> <li>• UKL UPL report, Amdal</li> <li>• HCV report and management plan</li> <li>• And other documents in accordance with RSPO guidelines</li> </ul> <p>Based on interviews with representatives of Rantau Hempang Village Loleng Village and Benua Puhun Village, it is known that the company has conducted outreach to the village regarding the mechanism access for documents publicly. The village party can explain the type of documents publicly.</p>
<b>1.1.2</b>	<p>Company provides information for stakeholders in form of mandatory report and submitted to relevant stakeholders, for example:</p> <ul style="list-style-type: none"> <li>- Report of HGU Utilization in 2022 PT PMM submitted to Land National Office of Kutai Kartanegara Regency on 2 January 2023.</li> <li>- Report of HGU Utilization in 2022 PT TJA submitted to Land National Office of Kutai Kartanegara Regency tanggal 2 January 2023</li> <li>- Report on the progress of the plantation business for semester II 2022 PT PMM submitted to Plantation Agency of Kutai Kartanegara Regency on 7 February 2023</li> <li>- Report on the progress of the plantation business for semester II 2022 PT submitted to Plantation Agency of Kutai Kartanegara Regency on 7 February 2023.</li> <li>- Handover proof of PT PRIMA MITRAJAYA MANDIRI Semester 2, 2022 environmental management and monitoring implementation report, which was reported to the Environment and Forestry Service and the Plantation Service of Kutai Kartanegara Regency on 1 February 2023.</li> <li>- Handover proof of Reporting on Employment of PT PMM with reporting number 12950.20230126.0011 dated 26 January 2023</li> </ul>

and obligation to report back on 26 January 2024.

- Handover proof of Reporting on OHS quarter IV 2022 OHS implementation program report to the Office of Manpower and Transmigration of East Kalimantan Province on January 12, 2023.

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

**1.1.3**  
The company has shown procedures regarding information responses listed in SOP No. PMM/SOP/General-02 (Revision 1) dated September 16, 2013 concerning Information Transparency, procedures are prepared with the aim of creating good and harmonious communication between the company and the community. Responses to information requests were made 2 weeks after the letter was received.

Based on interviews with representatives of Loleng Village, Rantau Humpang, and Benua Puhun Village, it is known that stakeholders have understood the mechanism for communicating and consulting with the company. In addition, the company also shows records of incoming letters from internal stakeholders in the form of Incoming and Outgoing Letters Books. Based on the review of the book documents, it is known that incoming letters from the majority of stakeholders are related to requests for assistance.

**1.1.4**  
The company has shown procedures regarding information responses listed in SOP No. PMM/SOP/General-02 (Revision 1) dated September 16, 2013 concerning Information Transparency, procedures are prepared with the aim of creating good and harmonious communication between the company and the community. Responses to information requests were made 2 weeks after the letter was received. Based on interviews with representatives of Loleng Village, Rantau Humpang, and Benua Puhun, it is known that stakeholders have understood the mechanism for communicating and consulting with the company.

**1.1.5**  
The company already has a list of stakeholders which includes the names of stakeholders, titles and names, contact numbers and addresses of stakeholders. Stakeholders listed include surrounding villages, indigenous peoples, partnership cooperatives, equipment suppliers, local contractors, sub-district level government agencies, companies around plantations, hospitals, as well as police and military commanders. From the list of stakeholders owned, the company has the opportunity to update the list of stakeholders it has, for example adding LB3 transporters, internal stakeholders, and others. (OFI)

Auditor checks by calling the numbers recorded in the document, from the results of random checking that the phone numbers are in accordance with the existing list.

	<b>Status: Comply</b>	
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**1.2**  
**The unit of certification commits to ethical conduct in all business operations and business transactions.**

**1.2.1**  
PT PMM and PT TJA which is a plantation company under Evans Group Indonesia has a Policy on Sustainability and Business Ethics in July 2019. This policy explains, among others, about transparency and complaints, OHS, anti-bribery and anti-corruption, responsible employment (e.g. regarding modern slavery, sexual harassment, equality and anti-discrimination), and workers' rights the company has socialized the code of ethics to the stakeholder, for example:

- Socialization on March 8, 2023 which was attended participants from RHM
- Socialization on February 6, 2023 which was attended participants from RHE
- Socialization on March 9, 2023 which was attended participants from PME
- Socialization on January 24, 2023 which was attended participants from BJE (KKPA)
- Etc.

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

**1.2.2**

The company has several systems in place to monitor compliance and the implementation of ethical business policies and practices, namely:

- Through SOP of dispute solution (No. HRD-SOP15-01) which explained activities of dispute identification, dispute analysis, dispute management planning, dispute handling implementation, monitoring, evaluation and reporting.
- Through SOP No. HRD-SOP02-01 dated on 1 October 2019 concerning in handling internal and external complaints. The policy explained about the company's procedure of handling and documenting any complaints.

In addition, the company also routinely conducts internal audits every year covering aspects of the RSPO including ethical behavior. The RSPO internal audit conducted on January 2023. Based on verification on complaints logbook and results of the internal audit, known that there is no indication of a violation of ethical behavior.

**Status: Comply**

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

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

**2.1.1**

**Compliance with Social and Environment Regulation:**

The Bumi Permai Mill certification unit is under PT Prima Mitrajaya Mandiri and Rahayu Mill is under PT Teguh Jayaprima Abadi. In fulfilling compliance, the company has referred to all relevant laws and regulations, namely by having the following documents:

**PT Prima Mitrajaya Mandiri (unit Bumi Permai Mill dan 5 Estate)**

- The results of the environmental assessment in the form of an Environmental Impact Analysis (ANDAL) document in 2008 for an oil palm plantation with an area of ±21,500 ha. This document has been approved based on the Decree of the Regent of Kutai Kartanegara number KAKK/27/AMDAL/KELAPA SAWIT/2008 dated 24 September 2008.
- The results of the environmental assessment in the form of an Environmental Impact Analysis (ANDAL) document in 2010 for a palm oil processing mill with a capacity of 60 tons of FFB/hour with an area of ±46.05 Ha and Storage Tanks and Special Piers covering an area of ±28 Ha. The document has been ratified based on the Decree of the Regent of Kutai Kartanegara number KAKK/33/AMDAL/PARBIK, SPECIAL TANKS AND piers/XII//2010 dated December 13, 2010.
- Hazardous Waste Management Permit for temporary storage activities for Kahoi Estate based on the Decree of DPMPSTSP Kutai Kartanegara Regency Number P-660.4/038/DPMPSTSP/III.3-1/TPSLB3/03/2019 dated March 26, 2019 and is valid for 5 years.
- Hazardous Waste Management Permit for temporary storage activities for Bumi Permai Estate based on the Decree of DPMPSTSP Kutai Kartanegara Regency Number P-660.4/039/DPMPSTSP/III.3-1/TPSLB3/03/2019 dated March 26, 2019 and is valid for 5 years.
- Hazardous Waste Management Permit for temporary storage activities for Muara Wis Estate based on DPMPSTSP Decree of Kutai Kartanegara Regency Number P-660.4/038/DPMPSTSP/III.3-1/TPSLB3/03/2019 dated March 26, 2019 and is valid for 5 years. Currently, Muara Wis Estate is incorporated into the Beringin Jaya Estate.
- Permit for Hazardous Waste Management for temporary storage activities for PT Buana Wiralestari Mas – Bumi Permai Mill based on the Decree of the Regent of Kutai Kartanegara Number P660.1/129/BLHD-I/2016 dated 27 June 2016 and is valid for 5 years. The permit has passed the validity period, but the company can show the official report number 069/KKPS PMM/BPM/V/2021 dated June 21, 2022 regarding the Application for Extension of the Permit for the Hazardous Waste Storage of PT PMM for the Bumi Palma Mill unit.
- Permit for Utilization of Palm Oil Industrial Wastewater on Soil for Bumi Permai Mill based on the decision of the Regent of Kutai Kartanegara Number 660.1/002/B.II.1/SK-LA/BLHD/III/2014 dated March 7, 2014 with the area of land permitted for application an area of 200 hectares. The permit does not include the expiration date of the permit, regarding this, the Department explained that the permit will remain valid until there is a violation or a change in the application area. For now, there have been no violations and changes so there is no need to update.
- Surface Water Utilization Permit based on the Decree of the Minister of Public Works and Public Housing Number 447/KPTS/M/2020 dated May 6, 2020 which is valid for 5 years. The water intake point is located on the Kedang Semilis River with a maximum discharge of 51,300 m3/month.

**PT Teguh Jayaprima Abadi (unit Rahayu Mill dan 2 Estate)**

- The results of the environmental assessment in the form of an Environmental Impact Analysis (ANDAL) document in 2008 for an oil palm plantation with an area of ±5,100 ha. This document has been approved based on the Decree of the Regent of Kutai Kartanegara number KAKK/028/AMDAL/KELAPA SAWIT/2008 dated September 24, 2008.

- The results of the environmental assessment in the form of an Environmental Impact Analysis (ANDAL) document in 2009 for an oil palm plantation with an area of ±13,550 ha. This document has been approved based on the Decree of the Regent of Kutai Kartanegara number KAKK/008/AMDAL/KELAPA SAWIT/2009 dated March 16, 2009.
- Results of environmental studies in the form of UKL-UPL documents in 2018 for the construction of a palm oil processing factory with a capacity of 60 tons of FFB/hour. The document has been ratified based on the Decree of the DPMPSTP of Kutai Kartanegara Regency Number P.660.2/042/DPMPSTP/IV.3/REKOM-UKLUPL/09/2018 dated 7 September 2018. Based on the document, the company obtained an Environmental Permit Document Number P.660.2/074 /DPMPSTP/IV.3/IL-UKLUPL/09/2018 which was legalized by DPMPSTP on 17 September 2018.
- Hazardous Waste Management Permit for temporary storage activities for Mahakam Estate based on DPMPSTP Decree of Kutai Kartanegara Regency Number P-660.4/036/DPMPSTP/III.3-1/TPSLB3/03/2019 dated March 26, 2019 and is valid for 5 years.
- Hazardous Waste Management Permit for temporary storage activities for Rahayu Estate based on the Decree of DPMPSTP Kutai Kartanegara Regency Number P-660.4/037/DPMPSTP/III.3-1/TPSLB3/03/2019 dated March 26, 2019 and is valid for 5 years.
- Surface Water Utilization Permit based on the Decree of the Minister of Public Works and Public Housing Number 54/KPTS/M/2017 dated January 31, 2017 which is valid for 5 years. The water intake point is located on the Mahakam River with a maximum discharge of 1,140 m<sup>3</sup>/month. The permit has passed the validity period, but the company can show the Technical Recommendation Submission document number 003/K.DIRTJA/APU/II/2022 dated 24 February 2022 concerning Application for Water Resources exploitation for PT TJA.
- Operational Feasibility Letter for Wastewater Utilization System for Rahayu Mill based on the decision of the Environment and Forestry Office of Kutai Kartanegara Regency Number P-0723/DLHK/BID.III.2/660.31/10/2021 dated October 11, 2021 with the permitted land area for application an area of 200 hectares. The document refers to the technical approval given by the Office with document number P-0655/DLHK/BID-III-2/660.31/09/2021 dated September 21, 2021.

The results of an interview with the Environmental Service of Kutai Kartanegara Regency stated that currently, permit renewal using technical recommendations has been implemented, but a system to accommodate this has not been established, so that permit processing must go through the Ministry of Environment and Forestry, so it takes a relatively longer time. Based on the explanation above, the company is encouraged to ensure the progress of the extension of the two permits.

#### **Follow-up of the previous OFI assessment**

##### **Temporary hazardous waste storage permit**

- Hazardous Waste Management Permit for temporary storage activities at Bumi Permai Mill Number P660.1/129/BLHD-I/2016 dated 27 June 2016 and is valid for 5 years. The permit has passed the expiration date, but the company can show the official document number 069/KKPS PMM/BPM/V/2021 dated June 21, 2021 regarding the Application for Extension of the Permit for the Hazardous Waste Storage of PT PMM for the Bumi Permai Mill unit.
- Letter from the Ministry of Environment and Forestry, Directorate General of Waste Management, Hazardous Waste and Toxic Materials dated October 29, 2021, regarding directions for the permit process for storing hazardous and toxic waste.
- The company shows the direction of environmental documents No. S.1220/PDLUK/P25/PLA4/5/522 dated May 12, 2022 related to the extension of hazardous waste storage permit, explained in the document if there is no change in hazardous waste storage activities and facilities, the company can use the old environmental documents, the company is directed To take care of the hazardous Waste storage Permit extension online (Ministry of Environment website for integrated licensing online).
- The company has uploaded a number of documents required in the hazardous waste storage permit extension online to the Ministry of Environment website, integrated licensing online dated August 10, 2022 and until the Audit takes place the company is still waiting for verification from the technical unit of the Ministry of Environment after that immediately receives the decree hazardous Waste storage Permit.

##### **Utilization of Surface Water**

- Permit for Utilization of Surface Water at Rahayu Mill Number 54/KPTS/M/2017 dated January 31, 2017 which is valid for 5 years. The permit has passed the validity period, but the company can show the Technical Recommendation Submission document number 003/K.DIRTJA/APU/II/2022 dated 24 February 2022 concerning Application for Water Resources exploitation for PT TJA.
- Minutes of field inspection of surface water use and utilization No. SA 0302-BWS10/BA-PL/175.2 dated 23 January 2023.



- Minutes of field inspection for technical recommendations for PT TJA's water resources Utilization permit No. 0203-Bws10/BA-PL/2023 dated 15 February 2023.
- The company has uploaded a number of documents required in the Utilization of Surface Water permit extension online to the Ministry of Environment website, integrated licensing online dated August 10, 2022 and until the Audit takes place the company is still waiting for verification from the technical unit of the Ministry of Environment after that immediately receives the decree Utilization of Surface Water Permit.

**Best Management Practices**

- Using pesticides that have been registered and have a distribution permit in accordance with the required regulations
- Using high-quality and certified oil palm seeds from registered seed producers

**Compliance with OHS Regulation**

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

- The establishment of the P2K3 (OHS Committee) for PT PMM & TJA which were registered by the Manpower and Transmigration Agency of Kutai Kartanegara Province.
- Provision of PPE for free to all workers and arrange the use of PPE according to the type of work based on the free predetermined HIRAC.
- Have permits for all factory operating machines such as boiler and sterilizer machines that have been tested for eligibility according to applicable regulations.
- Has a license / competency for some special jobs that require more expertise such as OHS experts, hyperkes, boiler operators, diesel engine operators, welder, wheel loader operators and others in accordance with the requirements contained in the legislation.
- Has carried out a general health check (Medical Check Up) every year for all workers and special checks (cholinesterase, spirometry and audiometry) according to the level of risk / danger for certain jobs.
- Regarding operator training related to the realization that the fulfilment of the adequacy of licensed operators cannot be carried out due to the constraints of the covid 19 pandemic, but the company can show the training program and record communication with PJK3 (Occupational Safety and Health Service Company). This has been explained in indicator 3.6.2.

**Employment Aspects:**

- The company has complied with the payment of the minimum wage.
- The company already has and implements a pay scale structure.
- The Company has sent regular Employment Reports.
- The company has implemented working hours related to overtime work, rest periods, etc.

**Compliance with Worker Welfare Regulations**

The determination of wages at PT PMM and PT TJA based The Decree of the Governor of Kalimantan Timur No. 561/K.855/2022 dated December 6, 2022 concerning the Minimum Wage of Kutai Kartanegara Regency in 2023 which is Rp. 3,394.513.77.

**Legal Aspect**

**HGU**

The company already has land ownership documents, including *HGU* and *HGB* for PT PMM and TJA and the smallholder cooperative. From the land ownership documents, the total *HGU* and *HGB* for PT PMM and TJA is 11,236.69 Ha and the total *HGU* area for smallholder cooperatives is 2,501.78 Ha. All *HGU* and *HGB* are still valid.

Following are brief details of company *HGU* and *HGB*.

<b>PMM</b>	
HGU No. 20/SKHGU/BPN.64/XII/20212021	116.11 Ha
SK HGU No. 19/SKHGU/BPN.64/XII/2021	182.40 Ha
SK HGU NO. 2/HGU/KEM-ATR/BPN/2017	8,683.05 Ha
SK HGB No. 28/HGB/BPN-64/2015	12.23 Ha
<b>TJA</b>	
SK HGU No. 18/SKHGU/BPN.64/XII/2021	99.93 Ha

SK HGU No. 95/HGU/KEM-ATR/BPN/X/2019	2,115.88 Ha
SK HGB No. 59/HGB/BPN-64/IX/2020	14.90 Ha
SK HGB No. 27/HGB/BPN-64/2015	12.19 Ha
<b>Plasma</b>	
SK HGU No. 83/HGU/BPN-64/2016	176.21 Ha
SK HGU No. 84/HGU/KEM-ATR/BPN/2016	592.13 Ha
SK HGU No. 83/HGU/KEM-ATR/BPN/2016	971.59 Ha
SK HGU No. 84/HGU/BPN-64/2016	180 Ha
SK HGU No. 11/HGU/KEM-ATR/BPN/2017	391.7 Ha
SK HGU No. 01/SKHGU/BPN.64/III/2021	190.15 Ha
<b>Total</b>	<b>13,738.47 Ha</b>

**IUP**
**PMM**

- *IUP-B* covering an area of 21,500 Ha based on SK Regent of Kutai Kartanegara Regency No. 503/50/SK-DISBUN KUKAR/VII/2007 dated 26 July 2007
- *IUP-P* with a capacity of 60 tonnes of FFB/hour based on SK Regent of Kutai Kartanegara Regency No. 503/002/IUP-P/SK-BUN/XI/2011 dated 8 November 2011.

**TJA**

- *IUP B* covering an area of 13,550 Ha based on Decree of the Regent of Kutai Kertanegara Number: 503/64/SK-DISBUNKUKAR/XII/2007 dated 04 December 2007.
- PT TJA Industrial Business Permit with Business Identification Number 9120003642342 KBLI code 10431 with the issuance date of the First Project Business Permit October 12 2020. In the Minutes of Verification of Technical Documents by the Directorate General of Agro Industry Number: 7/IA.2.4/IND/VERTEK-IUI /X/2020 on October 12 2020 stated processing capacity is 45 tons of FFB/hour.

**2.1.2**

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 example, there are several names of legal documents owned by the company such as *HGU* certificate, Business permit and Collective labor agreement. The updating of the latest regulations for example Regulation of the Minister of Agriculture Number 3 of 2022 dated 18 February 2022 concerning Development of Human Resources, Research and Development, Replanting, and Facilities and Infrastructure of Oil Palm Plantations. The documented monitoring included methodology, personal in charge (PIC), source of info, frequency of update for tracking changes and communication of changes to relevant sections of the legislation update.

Base on interview with the contractor, evaluation of legal compliance for contracted third parties has been conducted on 28 February 2023. Result of evaluation is fulfillment related to aspects of OHS, employment, and environment to the contractor.

The evaluation of law registers for contractors is explained in more detail in 2.2.2. In addition, an internal RSPO audit has also been carried out to ensure contractor compliance with regulations on 10 January 2023 (PMM BPM), 13 January 2023 (PMM & TJA estate) and 26 January 2023 (TJA RHM).

**2.1.3**

In order to implement the management of operational boundaries, the company also shows records of monitoring and management of *HGU* boundary markers and its condition. Based on field observations at poles for each estate, such as No. PMM 01, PMM 02 in Beringin Jaya Estate, PLM MW 07, PLM MW 08 in Grenseng Indah Cooperative, and in *HGU* stakes No. 25, 22, 30 in Rahayu Estate, it was known that the poles were in the company's *HGU* and bordered on community land. The auditor did not find any indication of investment outside the rights that have been granted to the company.

Based on the results of consultations with representatives of Benua Puhun Village, Loleng Village, and Rantau Humpang Village, information was obtained that there were no indications of cases of boundary violations or excess planting. Company also showed a sample *HGU* monitoring document for the period March 2023 which explained that there were several stakes that could not be

accessed due to flooding and would be observed again when the floods receded and the other accessible HGU stakes were in good condition.

Based on field observations at poles for scheme smallholder, such as (Karya Bersama Cooperative) No. KB 29 and No KB 28, Mitra Sejahtera Cooperative (PLM 18 dan No.PLM 19) and Grenseng Indah Cooperative (No. PLM MW 07, No. PLM MW 08 and No. PLM MW 09), it was known that the poles were in the company's cooperative bordered on community land. The auditor did not find any indication of investment outside the rights that have been granted to certificate holder.

**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; 2.2.2; and 2.2.3**

The company already has a list of contractors included in the stakeholder list. The list of contractors includes all third parties working with PT PMM and PT TJA such as FFB transport contractors and CPO and PK Transporter. The list of stakeholders informs the name of the agency, contact name, field of cooperation and contact number. List contractors have been covering all third parties who have an agreement with CH, except for the hazardous waste transporter that become OFI in 1.1.5

The company has shown examples of agreement with contractors and supplier that have contained clauses regarding legal compliance obligations, such as:

- Agreement for FFB and Loose fruit transporter with Koperasi Mitra Sawit Mandiri No. PMM/PME/01/2023/005-Angkut TBS & Brondol dated January,2 2023
- Agreement for FFB transporter with Muso Salim No. PMM/BJE/01/2023/002-Angkut TBS -KKPA dated January 1, 2023.
- Agreement with FFB transporter with CV Virendra Putra No. TJA/RHE/03/2023/045 dated March 1, 2023

In the agreements have been explained about:

- Obligation to comply with employment regulation
- Obligation to provide social insurance (BPJS)
- Obligation to provide PPE for workers
- Obligation to comply with the provisions regarding OHS and the environment
- Prohibited from employing child labor, trafficked or forced labor

The company has shown documentation of legal compliance by the contractor, such as: Koperasi Mitra Sawit Mandiri → with a total of 23 workers:

- Evidence of *BPJS* employment payment for February 2023, paid on February 27, 2023
- Agreement Letter of worker with initial RD No. 095/KOP-MSM/XII/2022 dated December 5, 2022
- Agreement Letter of worker with initial IR No. 096/KOP-MSM/XII/2022 dated December 5, 2022
- Pay slip on February 2023 for workers for example with initial RD and IR. As for the wage is bigger than minimum wage.

The company also shows a contractor evaluation document that informs the name of the contractor and the evaluation results related to legal compliance such as worker age, PPE, Social insurance, minimum wages, etc. For example, evaluation of CV Muso Salim conducted on March 1, 2023 which has complied with applicable regulation.

Based on interview with contractors (such as Mitra Sawit Mandiri cooperative), known that unit certification has socialized about obligation to comply with regulation. In addition, based on interview also known that contractor has paid wages based on minimum wage regulation and has involved employees in BPJS program.

**Status: Comply**

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

**2.3.1**  
Based on document review of FFB supplier list, BPM received FFB from direct supplier until August 2022. Start from September 2022, BPM only received FFB from own estate, estate from same group (PT TJA) and associated smallholder. However, RHM received FFB from direct and indirect supplier. There are 4 direct FFB supplier of RHM and company showed the coordinate, legality rights,

and trade permit of the supplier, for example:

PT Arus Cipta Eriady located in Jambuk Village, Bongon Subdistrict, Kutai Barat Regency with coordinate S 00°19'44.41" and E 116°41'59.16". There are information about land rights in form of Land Certificate, and trade permit in form of Trading Business License issued by OSS.

Based on information above, it can be concluded that the Company already has the legality of the FFB supplier from direct supplier.

**2.3.2**

Based on document review of FFB supplier list, BPM did not receive FFB from indirect supplier. However, RHM received FFB from direct and indirect supplier. There are 9 indirect FFB supplier of RHM during 2022 and company showed the coordinate, legality rights, and trade permit of the supplier, for example:

CV Anugrah Jasha Invenstama located in Kembang Janggut Subdistrict, Kutai Kartanegara Regency. CV Anugrah Jasha Investama identified has 5 supplier that has land rights in form of land certificate and also has identified the coordinate of farmer plantation, for example initial farmer AD located in E117°21'12.19" and S0°19'0.72".

Based on information above, it can be concluded that the Company already has the legality of the FFB supplier from indirect supplier.

**Status: Comply**

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

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

**3.1.1**  
The Certification Unit has an annual and long-term plan for the year 2023-2027 which informs work plans, production projections, yields, projected financing of all plantation activities, sales projections, projected total revenues and total expenditure. For example in 2026 at Rahayu Mill it is targeted to have a FFB production of 38,570 tons with CPO production of 46,992 tons and PK production of 9,836 tons.

Evaluation of work plans is carried out routinely by the management of both central management and management units. Examples of evaluations carried out in units in the form of Budget Cost Region East Kalimantan. The company has shown examples of Budget Cost East Kalimantan Region Reports conducted on February 16, 2023 attended 12 participants. The report describes the achievements / results of the work plans that have been carried out. This annual and long-term plan included for their smallholders and also informed the management plant and its progress.

**3.1.2**  
Based on a study of the area statement document, it is known that the oldest plant is 15 years old (planting year 2007) so that at least in the next five years the unit of certification will not carry out replanting activities based on projected production of 2023 - 2027. The company also shows an e-mail address from the President Director dated 15 November 2022, which states that the replanting program can start in 2028 for nucleus estates and 2031 for plasma plantations.

Planned core plantation replanting program and Plasma 2028 – 2046 for PT PMM 926.11 Ha in year of 2028, PT TJA 0 Ha. For Plasma, the first plan will start in year of 2031, the second plan will be year of 2033, the 3rd plan will be year of 2035 and so on.

**3.1.3**  
The Company has conducted a Management Review of both PT PMM and PT TJA for the 2022 Period which was carried out on February 27, 2023 attended by 12 participants. The Management Review was carried out for 2022 performances. The management review carried out discussed productivity, targets and the achievement of both PT PMM and PT TJA. With an Action plan that becomes next year's resolution, among others:

- Audit Info (Buyer Audit Veritee, RSPO Audit PT PPM and PT TJA).
- Results of land application waste testing in December 2022.
- External socialization to nearby village (Loleng, Benua Puhun, Lebahoulaq, Rantau Hempang, Lebak Mantan, Bukit Jering, Bunga Jadi and Muara Kaman villages).
- Upkeep of conservation area.

- Result of internal audit sustainability

Besides that the certification unit implements evaluation of work plans is carried out routinely by the management of both central management and management units. Examples of evaluations carried out in units in the form of Budget Cost Region East Kalimantan. The company has shown examples of Budget Cost East Kalimantan Region Reports conducted on February 16, 2023 attended 12 participants. The report describes the achievements / results of the work plans that have been carried out.

**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 unit of certification shows evidence of the implementation of the action plan for continuous improvement, taking into account the main social and environmental impacts and opportunities facing the unit of certification, some of which are shown in the document:

- RSPO Internal Audit Report for PT PMM and PT TJA estate and mill such as PMM and TJA Estates Internal Audit dated January 13, 2023 by RSPO Internal Audit Team Sustainability, with 8 (eight) nonconformities and non-conformity fulfillment on dated February 16, 2023.
- Operational audit visit report by the general manager of agronomy dated January 21, 2022 with result among others:
  - Work steps, facilities and infrastructure in the management of pesticide packaging waste, fertilizer sacks and used PPE
  - Documentation of activities needed as evaluation material to the ministry of environment and forestry.
  - Sampling plan and mechanism for hazardous material characteristic test and toxicity test (TCLP)
- Budget Cost East Kalimantan Region Reports conducted on February 16, 2023 attended 12 participants. The report describes the achievements / results of the work plans that have been carried out.

**3.2.2**  
The company has shown the auditor regarding the RSPO metric template Version 2.1 that has been filled in according to the facts and data in the company's record documents, such as the number of workers, the area of production to the record of work accidents. Based on team auditor's review, the information has been matched with others document, such as supply chain record, demographic workers, etc.

Base on document verification, for The RSPO metric template known annual data 12-month period use (January to December 2022) for schedule reporting annual data social and environmental, included monitoring data of water consumption.

**Status: Comply**

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

**3.3.1**  
Plantation SOP has been indicated by the representative of the certification unit in the Guidebook for Technical Cultivation of PT Evans Indonesia. These documents include, among others, nursery, land clearing, planting oil palm, planting legumes, conserving water and soil, immature plants, controlling weeds, pests and diseases, maintaining productive crops, fertilizing, harvesting and transporting, vehicles and heavy equipment, replanting, water management, compost applications, PKS liquid waste applications. Example: Nursery SOP (AGR-SOP01-01), released on March 3, 2020, explaining the activities of the location requirements for nurseries, nurseries, to transport of seedlings. All procedures available on Bahasa Indonesia.

The certification unit shows the SOP of the factory, including weighing, grading, processing at each station, up to the receipt and release of CPO. for example, grading SOP with document number SOP / 6.1 / 2, revision 1, dated January 1, 2017, with the approval of the Mill Manager.

Based interview and field observation to Press Station and Boiler Station in Bumi Permai Mill, the operators can explain about the work procedures depend the established procedures.

The certification unit also shows the operational manual for plantation, mill and bulking safety with document number MNL / 4.1 / 2 revision 0, dated 31 October 2013. This manual contains safe work practice procedures for all operational activities of plantations,

mills and bulking. Includes sufficient training, fulfillment of work equipment and equipment along with PPE, periodic health checks, and work risk mitigation.

**3.3.2**  
To ensure consistency of procedures implementation, the company has a monitoring inspection mechanism that was carried out regularly through internal audit activities. An internal audit conducted twice a year or if needed which the scope of the inspection includes estate and mill operational activities. There are several types of audits that are conducted routinely by the company. For example:

- RSPO Internal Audit Report for PT PMM and PT TJA estate and mill such as PMM and TJA Estates Internal Audit dated January 13, 2023 by RSPO Internal Audit Team Sustainability, with 8 (eight) nonconformities and non-conformity fulfillment on dated February 16, 2023.
- Operational audit visit report by the general manager of agronomy dated January 21, 2022 with result among others:
  - Work steps, facilities and infrastructure in the management of pesticide packaging waste, fertilizer sacks and used PPE
  - Documentation of activities needed as evaluation material to the ministry of environment and forestry.
  - Sampling plan and mechanism for hazardous material characteristic test and toxicity test (TCLP)
- Budget Cost East Kalimantan Region Reports conducted on February 16, 2023 attended 12 participants. The report describes the achievements / results of the work plans that have been carried out.

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

**3.3.3**  
The company routinely evaluates management plans through internal and external audits. There are several types of audits that are conducted routinely by the company. For example:

- RSPO Internal Audit Report for PT PMM and PT TJA estate and mill such as PMM and TJA Estates Internal Audit dated January 13, 2023 by RSPO Internal Audit Team Sustainability, with 8 (eight) nonconformities and non-conformity fulfillment on dated February 16, 2023.
- Operational audit visit report by the general manager of agronomy dated January 21, 2022 with result among others:
  - Work steps, facilities and infrastructure in the management of pesticide packaging waste, fertilizer sacks and used PPE
  - Documentation of activities needed as evaluation material to the ministry of environment and forestry.
  - Sampling plan and mechanism for hazardous material characteristic test and toxicity test (TCLP)
- Budget Cost East Kalimantan Region Reports conducted on February 16, 2023 attended 12 participants. The report describes the achievements / results of the work plans that have been carried out.

All the results of the audit have been carried out with corrective efforts complemented by preventive measures so that similar incidents do not happen again in the future.

	<b>Status: Comply</b>
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**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 certification unit already has several documents related to social and environmental impact studies that are carried out independently or participatively by involving affected stakeholders in collaboration with accredited independent experts. Some of the documents held by the unit of certification are as follows:

**Social and Environmental Impact Assessment (SEIA)**

The company has conducted environmental and social studies prior to land clearing by Environmental Consultants (Charlie Ross) in February - March 2007, with the final document in April 2007. The study aims to provide a framework of Terms of Reference for environmental, social, health and safety management, as required on the RSPO P&C, 2005. The scope of the study is based on the Location Permit which is divided into 2, including:

- PT Prima Mitrajaya Mandiri (PMM) which is located in 2 locations with a total area of 20,000 ha.

- PT Teguh Jayaprima Abadi (TJA) which is located in 3 locations with a total area of 17,400 ha.

Based on the results of the study, information was obtained that PT PMM and PT TJA do not have Primary Forest, but there are areas with High Conservation Value, namely Riparian Forest and Swamp Forest near the Mahakam River. Therefore, the company is recommended to set aside about 10% of the concession area for conservation, which will protect the Swamp Forest area and other representative vegetation types. The results of the study also provide recommendations related to environmental and social management for the period before, during and after development.

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

The Bumi Permai Mill certification unit is under PT PMM and Rahayu Mill is under PT TJA, the company already has an Environmental Impact Assessment (EIA) document that covers all areas that fall within the scope of certification and can be proven based on the following documents:

##### **PT Prima Mitrajaya Mandiri (unit Bumi Permai Mill and 5 Estate)**

- The results of the environmental assessment in the form of an Environmental Impact Analysis (AMDAL) document in 2008 for an oil palm plantation with an area of ±21,500 ha. This document has been approved based on the Decree of the Regent of Kutai Kartanegara number KAKK/27/AMDAL/KELAPA SAWIT/2008 dated 24 September 2008.
- The results of the environmental assessment in the form of an Environmental Impact Analysis (AMDAL) document in 2010 for a palm oil processing mill with a capacity of 60 tons of FFB/hour with an area of ±46.05 Ha and Storage Tanks and Special Piers covering an area of ±28 Ha. The document has been ratified based on the Decree of the Regent of Kutai Kartanegara number KAKK/33/AMDAL/PARBIK, SPECIAL TANKS AND piers/XII//2010 dated December 13, 2010.

##### **PT Teguh Jayaprima Abadi (unit Rahayu Mill and 2 Estate)**

- The results of the environmental assessment in the form of an Environmental Impact Analysis (AMDAL) document in 2008 for an oil palm plantation with an area of ±5,100 ha. This document has been approved based on the Decree of the Regent of Kutai Kartanegara number KAKK/028/AMDAL/KELAPA SAWIT/2008 dated September 24, 2008.
- The results of the environmental assessment in the form of an Environmental Impact Analysis (AMDAL) document in 2009 for an oil palm plantation with an area of ±13,550 ha. This document has been approved based on the Decree of the Regent of Kutai Kartanegara number KAKK/008/AMDAL/KELAPA SAWIT/2009 dated March 16, 2009.
- Results of environmental studies in the form of UKL-UPL documents in 2018 for the construction of a palm oil processing factory with a capacity of 60 tons of FFB/hour. The document has been ratified based on the Decree of the DPMPSTSP of Kutai Kartanegara Regency Number P.660.2/042/DPMPSTSP/IV.3/REKOM-UKLUPL/09/2018 dated 7 September 2018. Based on the document, the company obtained an Environmental Permit Document Number P.660.2/074 /DPMPSTSP/IV.3/IL-UKLUPL/09/2018 which was legalized by DPMPSTSP on 17 September 2018.

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 implementation times contained in the *RKL-RPL* matrix. The document has also covered all aspects of plantation and mill activities and their changes throughout the operational activities. The sampling methodology used is also participatory involving external stakeholder groups for the purpose of identifying impacts. Based on the verification of these documents, it can be concluded that all environmental impacts from plantation activities have been identified and their management recommended with reference to relevant laws and regulations.

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

The certification unit is under the company PT PMM and PT TJA, because of this, the certification unit has 2 forms of Social Impact Assessment (SIA) documents which were both carried out simultaneously by the Malaysian Environmental Consultant (MEC) on 12 April - 25 April 2021 with the final document in the form of Social Impact Assessment Report (SIA) of PT PMM and PT TJA for May 2021. This SIA assessment involved scheme smallholders' as a sample of in-depth interviews and providing information to the assessor. This study is an upgraded version of the previous SIA study document conducted in 2012 and 2017, so that for the Surveillance 1.3 period, the results of the latest assessment have been referred to. The social impact assessment has also been carried out based on the RSPO - INANI 2018 principles and criteria standards so that it can be used for other certification schemes that require a social impact assessment report.

This study explains the impacts arising from plantation activities, including population, education, livelihoods, income, health, facilities and infrastructure, customs and culture of the villagers around the company, environmental management efforts in the social, economic and cultural fields as well as community perceptions. about the existence and benefits of the company. The assessment

involved all affected parties, both internal and external stakeholders, including employees, trade unions, heads of surrounding villages, local NGOs and smallholders. Evidence of participation with affected parties is shown in the form of attendance at FGD meetings and photos during interviews. In addition, the SIA study has also been disseminated to villagers and stakeholders in the affected area with documentary evidence Public Consultation Report for High Conservation Value (HCV) and Social Impact Assessments conducted on 6 December 2021 and attended by 54 participants. The report also contains a matrix of Social Management Plan and Social Monitoring Plan which contains recommendations for managing identified social impacts.

Community representatives who became resource persons in this assessment were village heads, village officials, traditional leaders, and plasma farmers. The types of data collected are primary data and secondary data. Primary data collection for monitoring the management of social impacts is obtained from relevant stakeholders as affected parties as well as local village officials who represent the community and as verifiers. Secondary data or indirect data collection is carried out by means of literature studies through various references such as environmental assessment documents, HCV assessment documents, local government literature, CSR implementation records, company internal data, correspondence between companies and affected parties, local news and news. national and so on. All of these data sources are used as consideration for social impact management recommendations. Based on the verification of these documents, it can be concluded that all social impacts of plantation activities have been identified and their management recommended with reference to relevant laws and regulations.

#### **High Conservation Value Assessment (HCVA)**

The unit of certification has also conducted several studies related to areas with high conservation values which are described in full in indicator 7.12.2. The latest HCV management reference is based on the December 2022 HCV Assessment Report conducted by the Malaysian Environmental Consultant (MEC). The report also contains a matrix of High Conservation Value Area Management and Monitoring Plans which contains recommendations for the management of all identified HCV areas.

Based on the results of the 2022 HCV document review, information was obtained that the impact assessment on HCV, biodiversity and RTE species carried out also included areas outside the concession boundary. HCV areas consist of protected areas for flora and fauna, riverbanks and other high conservation value areas. Based on the verification of these documents, it can be concluded that all areas with high conservation potential and protected areas have been identified and their management recommended with reference to the relevant environmental management guidelines.

#### **3.4.2**

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

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

Based on the verification results of each *RKL-RPL* document for Semesters 1 and 2 of 2022 for the scope of PT PMM and PT TJA, it can be concluded that all the management and monitoring parameters requested in the environmental document matrix have been implemented. The certification unit has also evaluated every parameter of significant impact monitoring carried out as required in KepmenLH 45 of 2005, which includes evaluation of trends, evaluation of critical levels, and evaluation of compliance. Based on the results of the evaluation, it is known that there are several parameters that are not in accordance with the applicable Quality Standards, but 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 compatibility between the management and monitoring plans and their implementation in the field. Several things can be concluded from the results of the document review, including:

- Preventing soil, water and air pollution by reducing the use of chemicals, managing waste properly and complying with proper waste disposal in each area.
- Carry out efforts to save the environment by protecting areas important for environmental sustainability such as river borders, swamp forests and secondary forests.
- Manage and monitor the impact of potential land fires.
- Manage and monitor the quality of soil, air, water and other disturbances.
- Utilize palm oil waste as a substitute for fertilizers and fossil fuels.

This can also be proven from the results of field visits to EFB storage areas, WWTP areas and Land Application areas as well as river border conservation areas. The results of interviews with the community around the company also stated that they did not feel any environmental impacts related to the company's operational activities. The company has also carried out environmental management



in accordance with the RKL-RPL by installing signboards for conservation areas, markings in the form of stakes and red paint for limits for other chemical applications. Based on the results of interviews with sprayer and fertilization officers, they also stated that they were aware of the prohibition on the use of chemicals in the buffer zone marked in red. In addition, they do not use chemicals when they are close to water bodies such as canals, reservoirs or artificial ponds.

The unit of certification has also made an *RKL-RPL* report every semester which refers to the environmental management and monitoring matrix. Environmental management reports are carried out every 6 months and submitted to the relevant agencies, for example the *RKL-RPL* Report for Semester 2 of 2022 which is sent to the Environmental Agency of Kutai Kartanegara Regency with proof of receipt dated February 1, 2023, which is accompanied by a stamp, signature and name of the recipient. as well as proof of document delivery notes. Based on the results of interviews with the Environmental Service regarding reporting on the implementation of RKL-RPL, the certification unit routinely does this and up to the time the audit was conducted there were no complaints or conflicts related to the environment from NGOs or local communities around the company.

For the scope of PT PMM which has 2 environmental documents, namely *ANDAL* 2008 for plantations and *ANDAL* 2010 for factories as well as Storage Tanks and Special Piers, the company already has RKL-RPL report documents for semesters 1 and 2 of 2022 which are prepared to fulfill the obligations of the two environmental documents issued by PT PMM. owned. Likewise for the scope of PT TJA which has 3 environmental documents namely *ANDAL* 2008 for an area of 5,100 Ha, *ANDAL* 2009 for an area of 13,500 Ha and UKL-UPL for the scope of the factory, the company also has a report document *RKL-RPL* semester 1 and 2 of 2022 which compiled to fulfill the obligations of the three environmental documents that can be proven from the management activities that have been carried out for the entire scope, for example environmental parameter testing, impact analysis, and waste management.

Base on document verification of the *RKL-RPL* document PT TJA has been explained the scope of the POM, and the management and monitoring components carried out are not yet specific as requested in the 2018 UKL-UPL matrix such as Decreasing Air Quality, Increased noise intensity, Decline in surface water quality and etc. *Based on this explanation, the company has followed up OFI on the previous assessment and it has been declared fulfilled.*

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

The document on the results of the 2021 SIA study as described in indicator 3.4.1 is used as a guide in the preparation of the social impact management program which is an updated document from the results of previous studies conducted in 2012 and 2017. In the document there are several social programs, including the provision of assistance routine social services for the surrounding community, economic improvement through cooperation with companies, job openings, and improvement of community welfare through plasma partnerships. Program planning is carried out based on the results of the Focus Group Discussion in April 2021 conducted with stakeholders including the village community around the company as well as the results of the potential and risk analysis with evidence of documentation and attendance attached. The program is a general plan that will be implemented by the company based on the analysis of stakeholder needs and stakeholder mapping related to the company, either directly or indirectly. Thus, the planned program is directed as far as possible to strengthen the company's relationship, communication and cooperation with all stakeholders.

The company also evaluates the Management Plan every year to monitor the progress of program management, for example, there are programs that need to be stopped, continued or added. The evaluation of the last management plan was carried out in conjunction with the 2021 SIA study, the evaluation activity was also a reference in the preparation of the program for the 2022-2023 period. Based on the results of the verification of the results of the SIA study document in 2022, it can be concluded that all activities listed in the previous Social Impact Management Plan have been carried out. The document also includes social programs to avoid/mitigate negative social impacts, partnership programs for farmers, human rights, CSR programs, gender equality, education and public health. When referring to the 2021 SIA Report document for PT PMM and PT TJA, it can be concluded that the study has been carried out in depth and comprehensively. All aspects requested in the 2018 RSPO P&C have been covered in the study. This can be proven from the identification of positive and negative impacts obtained, as well as analysis of root causes, mitigation actions and their management have also been explained in the document.

Based on the results of consultations with workers' representatives, there is no form of discrimination against workers, no underage workers were found, the company has also fulfilled the rights of its employees, several important facilities for employees have been provided by the company such as housing, water, electricity, places of worship, public facilities. educational infrastructure (schools), and other facilities. The company also allocates resources for the maintenance of the entire facility. The resource persons also stated that they can voice their views through their own representative institution or a spokesperson they choose in the evaluation activities

to review and develop mitigation plans, as well as monitor the success of the implemented plans. Based on the results of field visits and external stakeholder interviews related to the management of social impacts carried out by the company for the period of 2022, it can also 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 managed and included in the management plan, which is still being managed.

The record of the plan on mitigation, implementation and monitoring according to the SEIA report has been explained on each document, for mitigation environmental impact describe on RKL-RPL report every semester (the last record on Semester 2 of 2022 ) and social impact describe on implementation of the management and monitoring social impacts report carried out by the company for the period of 2022.

### **3.4.3**

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

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

The company involves the Environment Agency 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 RKL-RPL reports and other environmental management documents sent every certain period which can be proven in indicator 1.1.2. The company also does not block access to all environmental agencies if they are going to carry out field verification to their management areas. It aims to obtain advice and advice in carrying out environmental management in accordance with the government's vision, mission and programs so that it can run synergistically. This can be proven based on the results of interviews with the Environmental Service of Kutai Kartanegara Regency who conducted a field visit on December 2022 to conduct supervision related to environmental management. Monitoring and updating related to environmental impact management is also carried out in conjunction with an evaluation of HCV management in 2021 which is described in more detail in indicators 7.12.2 and 7.12.4. However, in general, all recommendations from the evaluation of HCV management carried out in a participatory manner will be carried out in line with the management and monitoring of environmental impacts.

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

Based on the 2021 Social Impact Assessment Report, the social impacts in this assessment are divided into positive impacts, and negative impacts. The social impact assessment is carried out based on the perceptions of community representatives at the assessment location who 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 on both external and internal levels, and so on as described in indicator 3.4.2. The company conducts annual evaluations to harmonize data collection related to community perceptions regarding the SIA Management Plan and adjust it to the latest needs according to conditions in the field.

The SIA Management Plan has also been evaluated and updated every 2 years by involving affected stakeholders. The company can show evidence that it has carried out an evaluation through the Social Impact Assessment Report document for PT PMM and TJA with a document date of May 2021 which was carried out by an external party. Based on the results of the verification of the document, it shows that all social management and monitoring plans that have been implemented and monitored are then updated periodically in a participatory manner by accommodating the aspirations of stakeholders. The evaluation activity was also carried out to prepare the SIA program which will be carried out for the next 2 years, namely the 2022-2023 period. In addition, for annual activities, a review is also carried out to determine whether there is a possibility of additional programs for the next 1 year. For the 2022 review period, it still refers to the results of the 2021 SIA study mentioned above.

In the review activity, the assessment team has referred to the 2018 RSPO P&C regarding plantation development that is responsible for social and environmental aspects by referring to the Free, Prior, Informed and Consent (FPIC) Principles. The principle of FPIC which is the basis for the company in carrying out the process of developing oil palm plantations, among others, involves women's representatives, customary leaders, land owners around the company's area, plasma and independent smallholders, as well as all affected parties. The document also contains recommendations and plans for implementing activities in overcoming social issues that need to be carried out by the company, including:

- The company immediately disseminates company regulations to workers.

- The company immediately fulfills the target of plasma land planting of at least 20% and facilitates plasma cooperatives to immediately obtain land legalities.
- The company immediately develops policies and strategies for social management, which are the basis and basic framework for developing social management programs.
- In the context of preparing the company's social management plan, immediately carry out social mapping and mapping of community social issues in villages around the plantation area in a more in-depth and comprehensive manner.
- Ensure that all workers in the company receive health insurance.
- Completing infrastructure in the plantation area (road facilities, sanitation and solid and liquid waste disposal) for a healthy environment and child care.
- PT PMM and PT TJA should use the information from the 2021 SIA review to develop a 5-year social management plan but this plan must be revised at least every 2 years.

Based on the explanation above, it can be concluded that the company has made efforts to update the social and environmental management program periodically with clear and accountable evidence.

**Status: Comply**

**3.5**

**A system for managing human resources is in place.**

**3.5.1**

The company already has a human resources management system, which is contained in the following documents, as follows:

- SOP No. IDN-HRD-SOP01-01 dated on 01 February 2021 concerning Recruitment.
- SOP No. IDN-HRD-SOP03-01 dated on 01 February 2021 concerning The Structure of Job Class and Position.
- SOP No. IDN-HRD-SOP04-01 dated on 01 February 2021 concerning Remuneration.
- SOP No. IDN-HRD-SOP05-01 dated on 01 February 2021 concerning Employee's Appraisal.
- SOP No. IDN-HRD-SOP06-01 dated on 01 February 2021 concerning Promotion.

Company also has Company regulation 2023-2025 that was ratified by Manpower Agency, as follows:

- PT PMM → based on Letter No.SK-153/Distransnaker/TK2/500.15.15.1/01/2023 on January 19, 2023
- PT TJA → based on Letter No.SK-151/Distransnaker/TK2/500.15.15.1/01/2023 on January 19, 2023

As for, the company regulation has described the human resources management system, such as:

- Recruitment of workers
- Wages
- Overtime
- Mutation
- Work termination
- And others

The system regarding human resources system available to their workers and representatives. The human resources system also in accordance with applicable regulations as well as for retirement and termination of employment has been described in company regulations. As for the status of workers in the smallholders scheme is permanent workers. Because the smallholders scheme in the certification unit is fully managed by the company. So that all workers, including workers in the smallholders scheme, are recruited and under company management.

**3.5.2**

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

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

**Recruitment**

- Recruitment documentation with the initials NH such as job application letters, results of health checks, ID cards, Family card

and others. Company has shown probation agreement for that worker with the probation period of 3 months No. 14/SK-SKU-H/MKE/2023 on January, 9 2023.

- Recruitment documentation with the initials AR such as job application letters, results of health checks, ID cards, Family card and others. Company has shown probation agreement for that worker with the probation period of 3 months No. 021/SK-SKU-MP/Masa Percobaan/RHM/VIII/2022 on August, 11 2022. Company has also shown appointment letter for the worker with Decree No. 025/SK-SKU-H/RHM/XI/2022 on November 11, 2022.

**Promotion**

- Promotion of grade increase from SKU H to SKU B for 5 workers based on document Attachment 1 SE D2-001-00

**Termination**

- Notice of Termination of Employment No. 006/BPM/SPPHK/XII/2022 dated o December, 10 2022. The worker has accepted the termination based on response letter on December 14, 2022. As for the worker’s right has been transferred on December 20,2022.

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

**Status: Comply**

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

**3.6.1**  
The company can show the results of the risk identification document and its implementation plan for all Estate and Mill units (PT Primatama Mitrajaya Mandiri and PT Teguh Jaya Prima Abadi), contained in the Occupational Safety and Health Hazard Identification and Risk Assessment (IBPR) document dated January 16, 2021. The document describes the following: Activity Stages; Description of activities; Type of activity; Identification of Potential Hazards (Potential Hazards; Types; Hazards); Current Controls (Types of Controls; Description of Controls); Legal; Risk Assessment (Probability; Severity; Outcome); Determination of Control (Conclusion; Program Code)

The management unit has hazard identification and OHS risk assessment for Mills units (BPM and RHM) and PT PMM and TJA Plantation units (BPE, PME, KHE. LLE, RHE, MKE). Operational activities in plantations and mills have identified potential hazards, current controls, and level of risk. For example:

**Estates**

The main activities are maintenance of roads, trenches and bridges (filling, cutting, hardening) for the excavator activity stage loading soil/stone into dump trucks. The identified potential hazards are heavy equipment hitting other workers and the danger is workers experiencing limb injuries. Types of control include administration (heavy equipment has an approval of the feasibility of OHS operations, heavy equipment passes periodic OHS inspections and tests, operators of heavy equipment lifting and transport aircraft must have an operator’s OHS license, and socialization of safe working methods using heavy equipment.

Based on interviews and observations at the management units of PT PMM and PT TJA (BPE, BJE, PME, RHE, and MKE) including harvesting, spraying, and fertilizer workers in the estate that were sampled. Based on the results of the interviews, it can be concluded that the workers understand the policy regarding OHS and it is recognized that every morning apple is always reaffirmed about the importance of OHS and the use of PPE at work

**Mill**

The main activity of the CPO tank is the stages of the volume measurement process and CPO quality sampling. The identified potential hazards are falling from a height and the danger of fractures, sprains, death. The types of control carried out are engineering (installation of handrails and expended metal landings), administration (work instructions and safety warnings), and PPE (helmets, safety shoes, and gloves).

Based on interviews and observations at the BPM and RHM factories in management units including security guards, sorting workers, sterilizer operators, boiler operators, engine room operators, kernel operators and workshop mechanics, it can be concluded that the

workers understand the policy regarding K3 and it is recognized that every briefing in the morning always informed about the importance of K3 and the use of PPE at work.

Based on the results of the study of the Hazard Identification and Risk Assessment document that the company has identified all work activities in factories and plantations listed in the HIRAC document, namely

- PT. PMM, Bumi Permai Estate with form no: F-OSH-19-001 which was legalized on January 16, 2023 by the OSH Manager
- PT. PMM, Bumi Permai Bulking with form number: F-OSH-19-001 which was ratified on January 16, 2023 by the OSH Manager
- Bumi Permai Mill HIRAC document with form number: F-OSH-19-001 which was ratified on January 16, 2023 by the OSH Manager
- PT. TJA Estate with form number: F-OSH-19-001 which was legalized on January 16, 2023 by the OSH Manager

**3.6.2**  
The company can show evidence that it has carried out monitoring of the effectiveness of OHS to handle OHS risks in people including the following:

- The company can show records of OHS Committee meetings of all Estate and Mill units which are held once a month (more explanation in indicator 6.7.1)
- Medical Check Up (more explanation in indicator 7.2.10)
- The company shows records of monitoring the condition of facilities and infrastructure for dealing with estate and mill emergencies.
- The company shows records of inspections of conditions and compliance with the use of PPE.
- Identification of areas with potential emergency hazards such as areas prone to fire, explosion, land / water pollution, and workplace accidents and the results of monitoring conducted every month.

**Status: Comply**

**3.7**  
**All staff, workers, Scheme Smallholders, out growers, and contract workers are appropriately trained.**

**3.7.1**  
The company showed the Training Program in 2022 that cover all aspects of the P&C RSPO. The training also covers parties who need training such as staff, workers, FFB supplier and contractors. As for sustainability team and HR department are responsible for the development of the training program scheduling and implementation of training. The 2022/2023 training programs such as:

- Spraying Training
- Harvesting Training
- Manuring Training
- IPM Training
- SOP of FFB transporter training
- Training/socialization related to prohibition of spraying activity at riparian area
- Training/socialization related to prohibition of manuring activity at riparian area
- Safety driving training
- Welder training
- Pesticide handling training
- Land fire training
- Etc.

**3.7.2.**  
The company already has training records, such as:

- Land Fire training on February 16, 2023 which was attended by 27 participants.
- Electrical OHS expert on 9 – 29 June 2022
- Pesticide application training on May 20 2022
- Emergency drill on September 7, 2022 which was attended by 16 participants
- First aid training on December 31, 2022 which was attended by 6 participants.

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

**3.7.3**

The latest SCCS training in BPM was conducted on 12 April 2022 which was attended by 15 employees from security guards, weighbridges, sorting and grading divisions, staff, to administration. For Rahayu Mill, the training was conducted on 18 April 2022 with a total of 14 participants. Based on interview with weighbridge operator in BPM and RHM, it is known that they already understand the mechanism of supply chain and also can identified the FFB source from uncertified area.

**Status: Comply**

**3.8**

**Supply Chain Requirements for Mills**

**3.8.1, 3.8.2**

Based on interview with management and Bumi Permai Mill and Rahayu Mill receive FFB from certified source (own estate and associated smallholder) and uncertified area (other parties outside PT PMM and TJA). Therefore, BPM and RHM implemented Mass Balance module.

**3.8.3**

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

Bumi Permai Mill

Product	Estimate Production period	Actual Production (MT) of previous audit (March 2022 to Feb 2023)	Estimate Production for next 12 month (MT)
FFB	333,459	282,583.17	296,400
CSPK	16,964	12,730.24	16,300
CSPO	77,860	68,208.12	74,100

Rahayu Mill

Product	Estimate Production period	Actual Production (MT) of previous audit (March 2022 to Feb 2023)	Estimate Production for next 12 month (MT)
FFB	63,000	19,671.69	60,300
CSPO	13,860	3,215.86	13,800
CSPK	3,150	533.56	3,000

**3.8.4**

Unit management shows the registration and reporting requirements for the supply chain including:

**Bumi Permai Mill**

- Member ID: RSPO\_PO 1000001488
- Member Name: PT Prima Mitrajaya Mandiri
- RSPO member number: 1-0027-06-000-00 (M.P. Evans Group PLC)
- License ID: CB 115226

**Rahayu Mill**

- Member ID: RSPO\_PO 1000012847
- Member Name: Rahayu Palm Oil Mill, PT Teguh Jayaprima Abadi
- RSPO member number: 1-0027-06-000-00 (M.P. Evans Group PLC)

- License ID: CB 138085

**3.8.5**  
The company has a mechanism or procedure in the Standard Operating Procedure (IDN-SUS-SOP05-01, 25 January 2021). This procedure aims to explain in general terms the requirements regarding control system implemented to control certified palm products Roundtable on Sustainable Palm Oil (RSPO) throughout its supply chain, including material flows and claims regarding the product. Scope of the procedures are all activities related to supply chain, from FFB receiving, FFB process, administration recording, product claim, bulking traceability, palm trace usage, complain procedure, and training. The document also informs competent officers and their responsibilities, including:

- Head/Group Manager/Senior Manager: Overall responsibility for supervising the implementation of this procedure in all the regions he leads and ensuring that it does not conflict with company regulations.
- Administration Head: Reporting Mass Balance stock to the Marketing Dept. every week and reporting to the Mill Manager/GM/SM if there are deviations from this procedure.

The procedure already referred to latest SCCS standard (RSPO Supply Chain Certification Standard endorsed by the RSPO Board of Governors on 1 February 2020). The procedure also regulates handling non-conforming oil palm product from customers

**3.8.6**  
Latest internal audit has conducted on 13 January 2023, which also resulting there is no non conformities identified towards SCCS indicators

The company has conducted a management review related to sustainable principles which was carried out on February 27, 2023. The management review discussed the results of internal audits, communications to surrounding villages, and reports regarding the implementation of land applications.

**3.8.7**  
Based on the results of visits to the BPM weigh stations, it is known that there is information on FFB suppliers originating from RSPO non-certified sources, including:

- Maju Membangun Cooperative: Fields LL16K9 and LL17K1
- Etam Bersama Palm Oil Cooperative: Fields LL10K3, LL11K4, and LL17K2
- Tanah Sama Cooperative: Field BP10K2

Based on a field visit to the Tanah Sama Cooperative Block K48, it is known that the block is included in 2 fields which are RSPO certified and non-certified areas, namely Field BP10K2 and BP09K6.

From the results of interviews with management representatives, it is known that the Tanah Sama Cooperative has 2 fields which are non-certified RSPO areas, namely BP10K2 and BP12K5 and FFB from these fields is supplied to Bumi Permai Mill.

Bumi Permai POM record FFB received from certified and noncertified source, CSPO, and CSPK production for 12 months (March 2022 – January 2023), below is the details:

Month	FFB Certified (ton)	FFB Un-certified (ton)
March 2022	22,144.89	3,622.97
<b>Subtotal</b>	<b>22,144.89</b>	<b>3,622.97</b>
April 2022	22,234.84	3,833.13
May 2022	23,741.18	1,963.95
June 2022	30,179.37	1,089.59
<b>Subtotal</b>	<b>76,155.39</b>	<b>6,886.67</b>
July 2022	24,396.19	1,096.93
August 2022	27,352.90	1,032.87
Sept 2022	22,012.98	914.78
<b>Subtotal</b>	<b>73,762.07</b>	<b>3,044.58</b>
Oct 2022	21,389.94	847.72

Nov 2022	23,178.91	958.12
Dec 2022	23,976.16	949.95
<b>Subtotal</b>	<b>68,545.01</b>	<b>2,755.79</b>
January 2023	21,923.01	833.94
February 2023	20,053.15	876.59
<b>Grand Total</b>	<b>282,583.52</b>	<b>18,020.54</b>

Product	Last Year Projected Certified Volume (Ton)	Actual production from March 2022 – Feb 2023 (Ton)
CPO	49,910	68,208.12
PK	10,850	12,730.24

Based on table above, there is overproduction of certified CSPO and CSPK. This is caused by the period of actual production is longer than the license production. The last year certified volume started from 26 September 2022 – March 2023, however the actual production is taken from March 2022 – February 2023. There is gap between projected and actual production about 6 months. If the actual production is calculated from August 2022, then there is no overproduction of certified product.

The actual production from August 2022 – January 2023 is:

FFB: 110,521.17 MT

CSPO: 30,205.81 MT

CSPK: 3,495.67 MT

Company also showed the records of FFB, CSPO, and CSPK production in Rahayu Mill, as follows:

Month	FFB Certified (ton)	FFB Un-certified (ton)
March 2022	639.92	17,491.23
<b>Subtotal</b>	<b>639.92</b>	<b>17,491.23</b>
April 2022	698.93	17,008.08
May 2022	894.55	11,271.80
June 2022	2,199.69	14,102.38
<b>Subtotal</b>	<b>3,793.17</b>	<b>42,382.26</b>
July 2022	4,242.42	14,672.49
August 2022	2,367.60	16,882.70
Sept 2022	1,265.72	17,169.97
<b>Subtotal</b>	<b>7,875.74</b>	<b>48,725.16</b>
Oct 2022	1,283.31	15,632.96
Nov 2022	1,532.07	15,641.84
Dec 2022	1,313.66	16,387.09
<b>Subtotal</b>	<b>4,129.04</b>	<b>47,661.89</b>
January 2023	1,754.46	12,848.52
February 2023	1,479.36	11,432.50
<b>Grand Total</b>	<b>19,671.69</b>	<b>180,541.56</b>

Product	Estimate Production period of 26 Sept 2022 to 25 June 2023	Actual Production (MT) of previous audit (March 2022 to Feb 2023)
CSPO	13,860	3,215.86
CSPK	3,150	533.56

Based on explanation above, there is no overproduction of certified product during license period. Rahayu Mill mostly received FFB from uncertified sources.

Company also has mechanism for handling FFB and/or nonconforming documents which contained in SOP Supply Chain RSPO Product (No. Doc. BPMM/SOP/23 revision 7 on 28 May 2020).



**3.8.8**

Bumi Permai and Rahayu Mill showed the example of delivery document of certified product during licenses period. The documents showed such as weighbridge card, delivery order, delivery note, and transport document. These documents have informed about certified product, such as names and address of the buyers and sellers, delivery dates, product descriptions, quality, quantity, member ID, and others. For example:

- Delivery order – PK No. PMM-PK/DO/1223/0003 on 20 January 2023 to PT Wilmar Nabati Indonesia for amount 200 MT. Company also showed minutes of CSPK shipment No. PMM-PK/IP/1223/001 delivery to PT Wilmar Nabati Indonesia on 3 February 2023. The document has informed certificate number, quantity, name and address of seller and buyer, delivery date, and shipping delivery.
- Delivery order – CPO No. PMM-CPO/DO/1222/0025 on 8 December 2022 to PT Wilmar Nabati Indonesia for amount 3,500 MT. company also showed minutes of CSPO shipment No. PMM/CPO/IP/1222/024 delivery to PT Wilmar Nabati Indonesia on 13 December 2022. The document has informed certificate number, quantity, name and address of seller and buyer, delivery date, and shipping delivery.
- Delivery order – PK No. TJA-PK/DO/1222/0016 on 14 December 2022 to PT Kutai Refinery Nusantara for amount 250 MT. Shipping announcement number of those selling document can be seen in indicator 3.8.16.

**3.8.9, 3.8.10, 3.8.11**

The company has recorded the names and contract details of the CPO and PK transport contractors in the PT PMM and TJA stakeholder list documents. From the document, it is known that there is 1 contractor on behalf of CV Muso Salim. There is no new contractor from previous assessment Based on interviews with contractor representatives, it is known that they already have a cooperation agreement with the company and are willing to be audited by a certification body if necessary.

**3.8.12**

Based on the results of visits to the BPM weigh stations, it is known that there is information on FFB suppliers originating from RSPO non-certified sources, including:

- Maju Membangun Cooperative: Fields LL16K9 and LL17K1
- Etam Bersama Palm Oil Cooperative: Fields LL10K3, LL11K4, and LL17K2
- Tanah Sama Cooperative: Field BP10K2

Based on a field visit to the Tanah Sama Cooperative Block K48, it is known that the block is included in 2 fields which are RSPO certified and non-certified areas, namely Field BP10K2 and BP09K6.

From the results of interviews with management representatives, it is known that the Tanah Sama Cooperative has 2 fields which are non-certified RSPO areas, namely BP10K2 and BP12K5 and FFB from these fields is supplied to Bumi Permai Mill.

**Bumi Permai Mill**

During assessment, Bumi Palma POM has record of all CSPO and CSPK, as well as presented in the table bellows:

**Crude Palm Oil**

Month	CPO Production (MT)		CPO Delivery (MT)		
	Certified	Uncertified	Certified	Other Scheme	Noncertified
Opening stock	2,259.224	921.099			
March 2022	5,072.973	832.317	-	5,500.61	-
<b>Subtotal</b>	<b>7,332.20</b>	<b>1,753.42</b>	-	5,500.61	-
April 2022	5,133.58	885.89	-	4,500.22	1,499.99
May 2022	5,418.95	453.47	-	3,000.29	-
June 2022	7,073.45	256.85	3,000.11	3,000.15	-
<b>Subtotal</b>	<b>17,625.98</b>	<b>1,596.21</b>	<b>3,000.11</b>	<b>10,500.66</b>	<b>1,499.99</b>
July 2022	5,631.69	251.10	3,000.02	3,000.09	-

August 2022	6,296.71	239.95	3,000.26	3,000.17	-
Sept 2022	5,146.01	212.15	4,000.09	3,000.30	-
<b>Subtotal</b>	<b>17,074.41</b>	<b>703.20</b>	<b>10,000.37</b>	<b>9,000.56</b>	<b>-</b>
Oct 2022	5,021.77	5,600.43	4,000.17	1,600.26	1,400.23
Nov 2022	5,442.75	7,000.54	-	7,000.54	-
Dec 2022	5,656.86	6,500.51	3,500.26	3,000.25	-
<b>Subtotal</b>	<b>16,121.37</b>	<b>19,101.48</b>	<b>7,500.43</b>	<b>11,601.05</b>	<b>1,400.23</b>
January 2023	5,309.56	197.96	4,000.22	-	-
February 2023	4,744.59	207.49	3,000.04	3,000.04	-
Subtotal	10,054.15	405.45	7,000.26	3,000.04	-
<b>Grand Total</b>	<b>68,208.12</b>	<b>23,559.75</b>	<b>27,501.17</b>	<b>39,602.92</b>	<b>2,900.22</b>

Based on table above, it is known that all certified product is sold from certified production. As for the sale of other scheme or conventional, company has it removed from certified stock

**Kernel Palm Oil**

Month	PK Production (MT)		PK Delivery (MT)	
	Certified	Uncertified	Certified	Noncertified
Opening stock	404.03	198.90		
March 2022	1,154.63	189.26	586.15	150.00
<b>Subtotal 1Q</b>	<b>1,558.66</b>	<b>388.16</b>	<b>586.15</b>	<b>150.00</b>
April 2022	1,151.83	198.99	1,400.00	200.00
May 2022	1,192.64	100.26	1,045.54	-
June 2022	1,689.02	59.37	1,407.49	200.00
<b>Subtotal 2Q</b>	<b>4,033.49</b>	<b>358.61</b>	<b>3,853.03</b>	<b>400.00</b>
July 2022	1,232.63	55.44	2,098.03	
August 2022	1,346.97	50.42	1,225.98	
Sept 2022	1,080.42	42.76	1,378.36	
<b>Subtotal 3Q</b>	<b>3,660.03</b>	<b>148.62</b>	<b>4,702.37</b>	<b>-</b>
Oct 2022	1,042.79	40.98	774.60	
Nov 2022	1,122.12	45.98	925.00	
Dec 2022	1,195.24	47.53	1,225.00	
<b>Subtotal 4Q</b>	<b>3,360.14</b>	<b>134.48</b>	<b>2,924.60</b>	<b>-</b>
January 2023	64.93	488.09	-	251.98
February 2023	52.98	415.11	-	548.02
<b>Total</b>	<b>12,730.24</b>	<b>1,933.08</b>	<b>12,066.15</b>	<b>1,350.00</b>

Based on table above, there is no certified PK production sold as conventional.

**Rahayu Mill**

Below is record of all CSPO and CSPK in Rahayu Mill

**CPO**

Month	CPO Production (MT)		CPO Delivery (MT)		
	Certified	Uncertified	Certified	Other Scheme	Noncertified

Opening stock	-	1,769.80	-	-	-
March 2022	-	3,815.90	-	-	3,500.59
<b>Subtotal</b>	-	<b>5,585.69</b>	-	-	<b>3,500.59</b>
April 2022	-	3,762.82	-	-	3,000.25
May 2022	191.56	2,427.42	-	-	-
June 2022	434.11	3,067.31	-	-	500.04
<b>Subtotal</b>	<b>625.67</b>	<b>9,257.55</b>	-	-	<b>3,500.28</b>
July 2022	978.43	3,163.37	-	-	5,500.23
August 2022	514.98	3,612.81	-	-	3,000.13
Sept 2022	258.94	3,566.21	-	-	3,000.22
<b>Subtotal</b>	<b>1,752.35</b>	<b>10,342.39</b>	-	-	<b>11,500.58</b>
Oct 2022	265.61	3,147.34	-	-	6,000.44
Nov 2022	314.96	3,280.89	-	-	6,000.35
Dec 2022	277.55	3,476.50	-	3,000.32	1,000.29
<b>Subtotal</b>	<b>858.11</b>	<b>9,904.74</b>	-	<b>3,000.32</b>	<b>13,001.08</b>
January 2023	358.95	2,689.62	-	-	2,000.20
February 2023	246.45	2,437.48	-	-	3,000.44
<b>Subtotal</b>	<b>605.40</b>	<b>5,127.10</b>	-	-	<b>5,000.64</b>
<b>Grand Total</b>	<b>3,215.86</b>	<b>40,217.47</b>	-	<b>3,000.32</b>	<b>36,503.17</b>

Based on table above, it is known that all certified product is sold from certified production. As for the sale of other scheme or conventional during license period, company has it removed from certified stock.

**PK**

Month	PK Production (MT)		PK Delivery (MT)	
	Certified	Uncertified	Certified	Noncertified
Opening stock	-	341.67		
March 2022	-	809.91	-	606.70
<b>Subtotal 1Q</b>	-	<b>1,151.59</b>	-	<b>606.70</b>
April 2022	-	783.91	-	455.52
May 2022	34.21	443.05	-	929.10
June 2022	89.06	614.28	-	902.75
<b>Subtotal 2Q</b>	<b>123.27</b>	<b>1,841.25</b>	-	<b>2,287.37</b>
July 2022	-	850.02	-	371.78
August 2022	91.22	704.02	-	740.85
Sept 2022	50.87	697.04	-	900.00
<b>Subtotal 3Q</b>	<b>142.09</b>	<b>2,251.07</b>	-	<b>2,012.63</b>
Oct 2022	49.85	591.63	-	732.18
Nov 2022	59.11	630.60	-	967.82
Dec 2022	51.34	639.73	250.00	350.00
<b>Subtotal 4Q</b>	<b>160.29</b>	<b>1,861.96</b>	<b>250.00</b>	<b>2,050.00</b>
January 2023	64.93	488.09		251.98

February 2023	42.97	425.12		548.02
<b>Total</b>	<b>533.56</b>	<b>8,019.07</b>	<b>250.00</b>	<b>7,756.70</b>

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

**3.8.13, 3.8.14**

Mill has determined the extraction rate for CPO and PK to be produced. Based on actual production of CPO and PK for 12 months certificate period, the average extraction rate for CPO in BPM is 23.34% and PK in BPM is 5.07%. Also in RHM, the average extraction rate for CPO is 21.12% and PK is 4.10%. The Extraction rate for production projections will be update annually based on the actual production of CPO and PK. The Extraction rate for production projections will be update annually based on the actual production of CPO and PK.

**3.8.15**

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

**3.8.16**

**Shipping Announcement**

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

- Shipping announcement No. TR-d2c5570c-e0f3 for CSPO MB selling contract No. PMM-CPO/SC/1222/0027 and PMM-CPO/SC/0123/0002 amount 4,000.22 MT. This contract has been shipped on 13 December 2022 based on Minutes of CPO Shipment No. PMM/CPO/IP/1222/024. Shipping announcement was created on 13 February 2023.
- Shipping announcement No. TR-2329f09d-dfe3 for CSPK MB selling contract No. PMM-PK/SC/1222/0061 amount 375 MT. This contract has been shipped on 3 February 2023 based on Minutes of PK Shipment No. PMM/PK/IP/0123/001. Shipping announcement was created on 13 February 2023
- Shipping announcement No. TR-48cde68f-1afe for CSPK MB selling contract No. TJA-PK/SC/1222/0016 amount 250 MT. This contract has been shipped on 20 December 2022 based on Minutes of PK Shipment No. TJA/PK/DO/1222/016. Shipping announcement was created on 27 December 2022.

**Removed stock**

Company has removed its certified stock for another scheme and conventional scheme. For example, for license period, CSPO has been removed as amount as 3,000.32 MT in RHM and 4,600.57 MT in BPM.

**3.8.17**

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

**Status: Comply**

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

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

**4.1.1**  
 Company had a Policy concerning on Sustainability and Business Ethics. This policy applies to all operational areas of Evans Group Indonesia. The Group's subsidiaries, employees, contractors, consultants and group's guests are required to obey the policy. This policy is freely available on the Group's website and is regularly updated to reflect changes in regulations and standards. This policy deals with:

- Transparency and complaints
- Occupational health and safety
- Quality
- Anti-bribery and anti-corruption
- Responsibility of manpower (modern slavery, provision of a decent wage. affordable housing and food, sexual harassment, equality of opportunity and anti-discrimination, child labor, workers' cooperation)

- Worker rights (freedom of association, forced labor, reproductive rights)

The company also has a Policy on Sustainability of Local Communities dated October 2021 which explains prohibiting retaliation against human rights defenders.

Company is committed to act ethically and honestly in conducting business, implementing and enforcing effective system and controls to ensure there is no modern slavery within the Group or its suppliers or business partners. Company also committed to provide equal opportunities to all its workers, and prevent discrimination in the workplace, stated as follows:

- The Group will provide equal opportunities for all workers to obtain decent work and income and to develop their careers regardless of race, caste, nationality, ethnicity, religion, disability, gender, sexual orientation, trade union membership, politics, or age;
- The Group assigns all employees according to the expertise, appropriateness, ability, skills and experience of the individual, as well as the needs of the Group;
- The Group will not tolerate any discrimination based on sex, such as role restrictions, labeling, violence, intimidation and excessive workload;
- The Group will at all times comply with laws on discrimination in the process of termination of employment, terms and conditions of employment, wages and benefits, promotion and transfer opportunities, training, recruitment and reduction of workers.

The company has also shown documentation of socialization of company policies including human rights policies, such as:

- Socialization on January 17, 2023 which was attended participants from BJE
- Socialization on January 24, 2023 which was attended participants from BJE (KKPA)
- Socialization on March 9, 2023 which was attended participants from MKE
- Etc.

Based on interview with stakeholder such as government agency, community around, representatives of bipartite, and workers known that there is no indication of human rights violation.

**4.1.2**

Disallowance of violence or any intimidations stated on company's Policy concerning on Sustainability and Business Ethics. The policy explained that the group disallowance the physical abuse, forced labor, verbal abuse, intimidation, and harassment by the management or workers.

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

**Status: Comply**

**4.2**

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

**4.2.1; 4.2.2**

The company already has a mechanism for submitting complaints to both internal and external parties to ensure complaints or grievances are addressed or resolved in an effective, timely and appropriate manner as outlined in several SOPs as follows:

- SOP No. HRD-SOP15-01 dated on 03 February 2020 concerning in handling any dispute. The policy explained activities of dispute identification, dispute analysis, dispute management planning, dispute handling implementation, monitoring, evaluation, and reporting.
- SOP No. HRD-SOP02-01 dated on October,10 2019 concerning in handling internal and external complaints. The policy explained about the company's procedure of handling and documenting any complaints.
- SOP No.PMM/SOP/General-22 Revision 2, dated 27 April 2015 concerning Communication and Consultation. The procedure describes the mechanism for communication and consultation between the company and internal and external stakeholders. Stakeholders can submit complaints or communicate with the company through the PIC that has been appointed by the company. Thus, stakeholders who cannot read or write can submit complaints to the PIC to be recorded by the PIC

- Whistleblower system. It described that if there were any requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).

The results of interviews with management, obtained information that if there are complaints which resolution has not been found together, then the complainant can bring the compliance to the RSPO Complaints System. Based on interview with management and verification of procedure document, known that to ensure procedure has understood by affected party including illiterate party, procedure socialization conducted orally to stakeholder. Based on procedure verification, known that for illiterate party, complaints can be submitted by orally and will be recorded by designated officer in the complaint logbook.

The results of interviews with workers and representatives of bipartite known that workers understand the grievance mechanism. The results of interviews with contractors and head of village around indicated that the village and contractors had understood the grievance mechanism.

#### 4.2.3

The company already has a mechanism for submitting complaints to both internal and external parties as outlined in several SOPs as follows:

- SOP No. HRD-SOP15-01 dated on 03 February 2020 concerning in handling any dispute. The policy explained activities of dispute identification, dispute analysis, dispute management planning, dispute handling implementation, monitoring, evaluation, and reporting.
- SOP No. HRD-SOP02-01 dated on October,10 2019 concerning in handling internal and external complaints. The policy explained about the company's procedure of handling and documenting any complaints.
- SOP No.PMM/SOP/General-22 Revision 2, dated 27 April 2015 concerning Communication and Consultation. The procedure describes the mechanism for communication and consultation between the company and internal and external stakeholders. Stakeholders can submit complaints or communicate with the company through the PIC that has been appointed by the company. Thus, stakeholders who cannot read or write can submit complaints to the PIC to be recorded by the PIC
- Whistleblower system. It described that if there were any requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).

The company already has documentation of complaints. As for the complaints in last 1 year for example:

- Complaint from worker dated February 22, 2023 regarding damaged facilities of septic tank and has been responded on February 22, 2022.
- Complaint from worker dated February 17, 2023 regarding damaged closet and has been responded on February 20, 2023.
- Complaint from worker dated May 2, 2022 regarding water pipe damaged and has been responded on May 6, 2022.

Based on the results of interviews with the Manpower Office, it is known that there are industrial relations problems at PT PMM. The industrial relations problem has reached the mediation stage and the Manpower Office has issued a recommendation for this matter. The company has shown letter No. 036/PMM-HR/Ext/II/2023 dated 20 February 2023 which stated that he received advice from the Mediator. In this regard, the Company has the opportunity to ensure the realization of the recommendations given by the Industrial Relations Mediator (OFI).

Based on verification of documentation of complaints, known that there is only internal complaints that submitted to the company and no complaints from external parties. Based on interview with internal stakeholder such as workers and representatives of bipartite, known that all complaints have been responded by company. Based on interview with external stakeholder such as village representatives, government agency, previous land owner also known that there are no complaints to the company.

#### 4.2.4

The Company has some complaints/grievance mechanism, as follows:

- SOP No. HRD-SOP15-01 dated on 03 February 2020 concerning in handling any dispute. The policy explained activities of dispute identification, dispute analysis, dispute management planning, dispute handling implementation, monitoring, evaluation, and reporting. In the SOP, also explained that the reporting party has the freedom to choose people or groups who can support and/or act as observers.
- SOP No. HRD-SOP02-01 dated on October,10 2019 concerning in handling internal and external complaints. The policy explained about the company's procedure of handling and documenting any complaints.

- SOP No.PMM/SOP/General-22 Revision 2, dated 27 April 2015 concerning Communication and Consultation. The procedure describes the mechanism for communication and consultation between the company and internal and external stakeholders. Stakeholders can submit complaints or communicate with the company through the PIC that has been appointed by the company. Thus, stakeholders who cannot read or write can submit complaints to the PIC to be recorded by the PIC
- Whistleblower system. It described that if there were any requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).

The results of interviews with workers and representatives of bipartite known that workers understand the grievance mechanism. The results of interviews with contractors and head of village around indicated that the village and contractors had understood the grievance mechanism.

**Status: Comply**

**4.3  
The unit of certification contributes to local sustainable development as agreed by local communities.**

- 4.3.1**  
The company has developed a program to improve the welfare of the surrounding community which is listed in the 2023 CSR Plan and Budget document, for example as follows.
- Celebration of religious holidays
  - Assistance in building places of worship
  - Assistance with local arts and social culture
  - Assistance to improve village infrastructure

Based on management's explanation, it was stated that the CSR program was prepared with the participation of parties, for example village representatives, including considering the identification of community needs. Evidence of participation is shown in the absence of representatives from the Villages Surrounding the Company in the December 2021 Social Impact Assessment document. Based on the results of interviews with representatives of Benua Puhun Village and Loleng Village, it is known that the company has identified community needs.

**Status: Comply**

**4.4  
Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their Free, Prior and Informed Consent (FPIC).**

- 4.4.1**  
The company already has land ownership documents, including *HGU* and *HGB* for PT PMM and TJA and the smallholder cooperative. From the land ownership documents, the total *HGU* and *HGB* for PT PMM and TJA is 11,236.69 Ha and the total *HGU* area for smallholder cooperatives is 2,501.78 Ha. All *HGU* and *HGB* are still valid. Currently, the scope of RSPO certification for PT PMM and TJA is 20,522.20 Ha for the scope of own estates and smallholders.

Following are brief details of company *HGU* and *HGB*.

<b>PMM</b>	
HGU No. 20/SKHGU/BPN.64/XII/20212021	116.11 Ha
SK HGU No. 19/SKHGU/BPN.64/XII/2021	182.40 Ha
SK HGU NO. 2/HGU/KEM-ATR/BPN/2017	8,683.05 Ha
SK HGB No. 28/HGB/BPN-64/2015	12.23 Ha
<b>TJA</b>	
SK HGU No. 18/SKHGU/BPN.64/XII/2021	99.93 Ha
SK HGU No. 95/HGU/KEM-ATR/BPN/X/2019	2,115.88 Ha
SK HGB No. 59/HGB/BPN-64/IX/2020	14.90 Ha
SK HGB No. 27/HGB/BPN-64/2015	12.19 Ha
<b>Plasma</b>	
SK HGU No. 83/HGU/BPN-64/2016	176.21 Ha
SK HGU No. 84/HGU/KEM-ATR/BPN/2016	592.13 Ha

SK HGU No. 83/HGU/KEM-ATR/BPN/2016	971.59 Ha
SK HGU No. 84/HGU/BPN-64/2016	180 Ha
SK HGU No. 11/HGU/KEM-ATR/BPN/2017	391.7 Ha
SK HGU No. 01/SKHGU/BPN.64/III/2021	190.15 Ha
<b>Total</b>	<b>13,738.47 Ha</b>

In the RSPO notification regarding the latest Cultivation Rights dated April 1, 2020, among others stated:

1. For Initial Certification, the Unit of Certification must have HGU and IUP or other acceptable legal alternatives as defined in the National Interpretation; And
2. For Recertification audits, Certification Units may continue their certification as long as there is sufficient concrete evidence that the company has taken steps to obtain the HGU and must comply with all requirements at that time.
3. Surveillance Audit can be continued as stated in the previous announcement

These requirements are effective as of the date announced and the BoG will review the implementation of this decision and provide further guidance in the future. Based on this, the company has the opportunity to show positive progress in obtaining HGU for all areas within the scope of certification that do not yet have HGU (OFI)

**IUP**

- PMM
- IUP-B covering an area of 21,500 Ha based on SK Regent of Kutai Kartanegara Regency No. 503/50/SK-DISBUN KUKAR/VII/2007 dated 26 July 2007
  - IUP-P with a capacity of 60 tonnes of FFB/hour based on SK Regent of Kutai Kartanegara Regency No. 503/002/IUP-P/SK-BUN/XI/2011 dated 8 November 2011.

**TJA**

- IUP B covering an area of 13,550 Ha based on Decree of the Regent of Kutai Kertanegara Number: 503/64/SK-DISBUNKUKAR/XII/2007 dated 04 December 2007
- PT TJA Industrial Business Permit with Business Identification Number 9120003642342 KBLI code 10431 with the issuance date of the First Project Business Permit October 12 2020. In the Minutes of Verification of Technical Documents by the Directorate General of Agro Industry Number: 7/IA.2.4/IND/VERTEK-IUI /X/2020 on October 12 2020 stated processing capacity is 45 tons of FFB/hour

**4.4.2, 4.4.4**

Land compensation is conducted through process calculation of “*Ganti Rugi Tanam Tumbuh* (GRTT)” or compensation on land and any living plants above. Summary of land compensation on surrounding villages is presented in the following Table:

No.	Village	Total Area of GRTT (ha)
1	Benua Puhun	848.95
2	Bukit Jering	487.95
3	Lebaho Ulaq	1,894.82
4	Lebak Mantan	814.73
5	Loleng	2,754.75
6	Muara Kaman	1,864.00
7	Muara Kaman Ilir	30.31
8	Rantau Hempang	321.21
<b>Total Land Compensated (ha)</b>		<b>9,016.71</b>

Based on the table above, it was known that total compensation through GRTT process was about 9,016.71 ha. According to information from unit of certification and Plantation Agency, as well as representative from Village of Benua Puhun and Lebak Mantan it was known that process of land compensation had settled up since 2018. For example, several evidences related to land compensation is presented in documents as bellows:

- Official Report of Field Checking and Physical Survey No. 012/590/18/2001/MW/III/2017 dated 20 February 2017 on area covers



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

Based on interview with representatives of Loleng and Benua Puhun Village revealed that the land acquisitions process was preceded by socialization and then negotiations and after an agreement was reached, a compensation process would be carried out. The company also respects the people who do not want to give their ownership rights to the land. Therefore, in the company HGU there is actually still ownership of other parties.

**4.4.3**  
Company showed Operational map with scale varies from 1:50,000 to 1:120,000. The map has clearly informed coordinate line, legal boundary, as well as location of conservation area, smallholder's area, rivers distribution, mill, building and infrastructures, etc. Based on interview with BPN and Plantation Agency of Kutai Kartanegara, as well as with representatives from Loleng and Benua Puhun Village, it was known there were no occupation and/or overlapped with another busines activities on the estate operational areas. Furthermore, based on field observation, it was known that the map has giving actual situation on unit certification areas.

**4.4.5**  
Based on interview with representatives of Loleng and Benua Puhun Village revealed that the land acquisitions process was preceded by socialization and then negotiations and after an agreement was reached, a compensation process would be carried out. The company also respects the people who do not want to give their ownership rights to the land. Therefore, in the company HGU there is actually still ownership of other parties.

**4.4.6**  
Based on interviews with representatives of Benua Puhun and Loleng Village who understand the process and agreement for land acquisitions, it is known that the company has fulfilled the commitments and agreements submitted, such as development of smallholder, worker recruitment, and realization of CSR.

**Status: Comply**

**4.5**  
**No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.**

**4.5.1**  
Based on interviews with representative of Loleng and Benua Puhun Village and also previous land owners from both villages, it is known that until now there has been no additional permit or expansion of the company operational area. As for planting on year 2021, it was planted inside HGU. Also, there is no legal or customary rights in PT PMM and TJA. GRTT process were carried out in the past time. The company has Land Acquisitions Procedure Number PMM/SOP/Umum-19 dated January 1, 2011 that to identifying legal, customary or user rights, and for identifying people entitled to compensation. Based on public consultation with village representatives from, they know about the procedure through the socialization given and they agree with the procedure.

**4.5.2, 4.5.7, 4.5.8**  
The latest land compensation was conducted in 2018. Company also showed the example of land compensation as follows:

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

Based on interviews with representative of Loleng and Benua Puhun Village and also previous land owners from both villages, it is known that there is no legal or customary rights in PT PMM and TJA. Land compensation is conducted according to the FPIC process.

Process of compensation or acquisition has conducted through FPIC manners and did not diminish any legal rights and/or customary rights. Previous land owner also informs during the acquisition the process is transparent and inform the planning for oil palm plantation development in their area.

**4.5.3, 4.5.4**

Based on interview with representative of previous land owners of Benua Puhun and Loleng Village, it was known that process of compensation has been carried out smoothly, transparent, voluntary and fair through participative and FPIC approach. Process of compensation or acquisition has conducted through FPIC manners and did not diminish any legal rights and/or customary rights. Previous land owner also informs during the acquisition the process is transparent and inform the planning for oil palm plantation development in their area.

**4.5.5, 4.5.6**

Based on interview with representative of previous land owners of Benua Puhun and Loleng Village, it was known that process of compensation has been carried out smoothly, transparent, voluntary and fair through participative and FPIC approach. Process of compensation or acquisition has conducted through FPIC manners and did not diminish any legal rights and/or customary rights. Previous land owner also informs during the acquisition the process is transparent and inform the planning for oil palm plantation development in their area.

**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**

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

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

**4.6.3, 4.6.4**

Company also showed the example of land compensation as follows:

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

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

**Status: Comply**

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

**4.7.1, 4.7.2**

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

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

**4.7.3**  
Based on interviews with representatives of Benua Puhun and Loleng Village who understand the process and agreement for land acquisitions, it is known that the benefits obtained by people who have lost their land rights including road access, recruitment of workers from the surrounding village community, the realization of smallholder plantation, and realization of CSR programs as described in 4.3.1.

**Status: Comply**

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

**4.8.1, 4.8.2, 4.8.3, 4.8.4**

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

**Status: Comply**

**PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION**

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

**5.1.1**  
Based on document review, field observations and interviews with staff and management, it is known that the company obtains FFB supplies from third parties/FFB suppliers such as plasma, and FFB middleman suppliers. For cooperation with Plasma, the applicable FFB price refers to the decision of the Plantation Office per month and is routinely informed every month via email and communication media to the plasma/cooperative management. The company shows an example of a payment for the January 2023 period which was paid directly to the cooperative's account at the current price. The company can also show the Minutes of Meeting Results of the FFB Purchasing Pricing Team for that period.

For cooperation with middlemen, the price of FFB is determined in a work agreement agreed by both parties, several considerations in determining the price of FFB such as the price of CPO, PK, transportation costs, and proposed prices from suppliers. Before making a payment, the verification of the correctness of the payment calculation has been checked by both parties in the FFB sale and purchase calculation document, so that all complaints and confirmations related to payments have been completed before the payment is made. The pricing mechanism has been explained in the FFB sale and purchase agreement signed by both parties. Interviews with the management unit and FFB suppliers also stated that the FFB price that had been determined could be accessed by the supplier, and was informed every day via email, online communication media and telephone from the PIC to the supplier.

**5.1.2**  
As explained in indicator 5.1.1, the plasma FFB price refers to the price determined by the Plantation Service, while the FFB price for

middlemen uses the calculated price for CPO and PK which is updated daily. The company also has a mechanism for conveying prices which is done using email and communication media. Based on the results of interviews with plasma farmers, stated that the price set by the company was in accordance with the price set by the local Plantation Service, where if there was an update on the price, the company immediately conveyed it through communication media and posted it on the notice board at the Cooperative's office.

The company can also show proof of plasma management transparency by showing details of production and costs for the period February 2023 where in the document there is a table that explains FFB production data and details of management costs from discounted fees, maintenance costs, fertilization costs and others. This is conveyed to the plasma managing cooperative and has received approval from the cooperative management with proof of stamp before making payment. The results of interviews with the plasma administrators of the Karya Bersama and Tanah Sama Cooperatives also stated that the price distribution was quite clear and there were no complaints regarding payments, the value paid was divided into 80% for plasma, and 15% for the maintenance and management of the cooperative and 5% for planned savings. replanting with a monthly payment system. This is in accordance with the agreement letter agreed upon by both parties.

### 5.1.3

The company has determined the fair price that has been agreed with the plasma management cooperative as outlined in the Cooperation Agreement, in the document there is a statement that the price set for the determination of the selling price of FFB is the price set by the Plantation Service, so the parties hereby declare that they will comply with the price fixing so that one party and the other are not entitled to ask for a price increase or decrease. Meanwhile, the determination of prices with outside FFB suppliers refers to the calculation results of fluctuations in CPO and PK prices. There are also specifications and implementation requirements as well as sanctions that must be met by all parties, for example those contained in the Cooperation Agreement with FFB suppliers on behalf of PT Wong Akeh Utama and PT Anugrah Jasha Investama, are as follows:

- The first party has the right to refuse FFB if the quality does not meet the criteria for ripe fruit set.
- If there is a difference in weighing between the seller and the buyer's books, the settlement will be carried out on the day of delivery/delivery to avoid discrepancies in the weighing results when payment is made.
- FFB sold does not come from partnership plasma plantations built by companies/groups of companies, and is not stolen and/or from criminal activities.

Based on document review and interviews with suppliers of FFB and Plasma Cooperatives, it can be concluded that the company has determined a fair price which explains all components including the determination of premium value, savings, treatment cost discounts and others, all of which have been agreed upon by all related parties and are documented in the form of a letter. cooperation agreement and proof of payment.

### 5.1.4

The company can show evidence that representatives from FFB suppliers and cooperatives as plasma administrators are involved in drafting the contract. For example, the Letter of Cooperation Agreement with the cooperative is as follows:

- MoU with Karya Bersama Cooperative Number 001/SPK/KOP-KB/IV/2010 dated April 23, 2010 valid until April 23, 2040.
- MoU with Tanah Sama Cooperative Number 001/SPK/KTS/12/2011 dated December 2, 2010 valid until December 2, 2041.

The document contains agreements such as maintenance financing, loans/credits, repayments through FFB deductions for the replanting program and/or other support mechanisms that have been signed by all representatives of the cooperative, witnesses and the company. This shows that all relevant parties have been involved in the decision-making process and understand the contents of the contract.

The development of plasma plantations is also carried out to improve the welfare of the community around the plantations where currently management related to plantations is still carried out entirely by the company's management by assigning Managers and Assistants to help manage plasma within their management area. Cooperatives play a role in managing the finances obtained from the sale of FFB and distributing them to all members. Cooperative members consist of people around the company who want to be involved, not limited to men or women. Regarding the involvement of women in decision-making, it can also be proven from the results of interviews with the head of the cooperative which stated that plasma land was given to all communities living in the designated village, not limited to men or women. The informant stated that the contract was made with the agreement of both parties without any

coercion, intimidation and discrimination.

#### **5.1.5**

As explained in indicators 5.1.1 - 5.1.4 related to Cooperation Agreements with Cooperatives and independent smallholders, the results of the verification of the Cooperation Agreement Letter document indicate that all existing contracts have been made fairly, in accordance with applicable laws, are transparent and have a predetermined time period. agreed together. The results of the interview with the Cooperative Management stated that all members have understood the stipulated provisions such as the determination of FFB prices, management fees, management fees, loans, disputes, and others. The agreement has also been made in accordance with applicable laws in a fair, transparent, and has a clear time frame.

In addition, the company can also show a Statement of Cooperation for the purchase of FFB from the middleman supplier FFB, for example, a statement letter on behalf of PT Wong Akeh Utama was made on November 1, 2022 with Number 18/KLM-TJA/II/2022 and is valid for 1 year. In the statement made, it was stated that several conditions for FFB were mentioned, including FFB source location, FFB criteria, FFB repatriation, fines and delivery of FFB to the mill. Based on this explanation, it is known that the management unit already has a contract that is made fairly, in accordance with applicable law, and is transparent, and has an agreed term.

#### **5.1.6**

The Cooperation Agreement Letter explains the procedure / system for paying for the net sales of FFB, both for independent FFB suppliers, collectors and plasma. Payment is made based on the Minutes of FFB sale and purchase which has been agreed and signed by all parties. Based on the results of the study of the proof of FFB payment documents to the Perkebunan Karya Bersama Cooperative as well as the minutes of the presentation of the results and an explanation of the operational costs for the January 2023 period, it shows that the payment has been made on time and can be proven through a receipt for payment. The plasma fruit payment is valid for the period 1-31 January 2023. The payment has been completed with income from each farmer group, fruit tonnage, and price according to the period. Based on the results of the verification of the Plasma FFB price and proof of calculations from the payment recapitulation data, it is known that the payment has been in accordance with the price set by the Plantation Service. The proof of payment document also explains the details of production and monthly period costs, FFB production data and details of management costs, maintenance costs and fertilization costs. The document is also submitted to the cooperative through a meeting attended by representatives of the cooperative and has been approved with proof of stamp.

As for examples for payment of fruit for external FFB suppliers, for example, proof of payment of FFB to PT Wong Akeh Utama dated February 6, 2023 for the FFB delivery period on February 3-5 2023. The invoice is explained in the form of the amount of FFB received, the price applicable on the date of delivery, and total payment after withholding tax PPH22. Each payment data has been equipped with weighing data, grading reduction data and proof of transfer. Based on this explanation, it is known that the management unit has made fruit payments to plasma and the middleman supplier FFB in accordance with the contract they have, either the payment period or the specified price.

#### **5.1.7**

The company has tested the electronic weigh bridge for PT PMM and PT TJA by the Head of UPT Metrology legal, Kutai Kartanegara Regency Government with evidence, among others:

- Test Result Certificate for Bumi Permai Mill which was carried out on February 16, 2023 and valid until February 13, 2024, number 510.63/ 34/ DISPERINDAG/ METROLOGI/ II/ 2023 with serial number 103950243 and maximum capacity 60,000 Kg.
- Test Result Certificate for Rahayu Mill which was carried out on September 6, 2022 and valid until August 31, 2023, number 510.63/ 599/ DISPERINDAG/ METROLOGI/ IX/ 2022 with serial number 194550490 and maximum capacity 60,000 Kg.
- Test Result Certificate for Rahayu Bulking which was carried out on February 21, 2022 and valid until February 20, 2024, number 510.63/ 84/ DISPERINDAG/ METROLOGI/ II/ 2023 with serial number 200750769 and maximum capacity 60,000 Kg.

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

#### **5.1.8**

The company has conducted socialization related to RSPO certification to independent smallholders and plasma farmers through regular meetings. The company shows the Minutes of the annual meeting on August 9, 2022 which was submitted to FFB suppliers attended by 18 participants about the benefits of the RSPO, and the recommendation to register for the RSPO. From the results of

the meeting, it was stated that independent smallholders would follow the company's initiation to include their land in RSPO certification and would follow all existing requirements and regulations. In this socialization activity, the certification unit also promoted the RSPO. Based on the results of the socialization conducted to FFB suppliers, it was concluded that the certification activities had not been realized. This is due to difficulties in establishing cooperatives and farmer groups to coordinate certification activities. The results of interviews with the company stated that they are currently assisting in the socialization phase to all suppliers who cooperate with the company. The informant stated that he was very interested in participating in the RSPO certification because the benefits were quite a lot, in addition to the increase in FFB prices, market demand would also be higher because of the status of the certified fruit.

**5.1.9**

The company also has procedures related to communication, consultation and coordination contained in the SOP document for Handling Complaints and Dissatisfaction Number PMM/SOP/General-05 which is valid on January 1, 2011 and SOP for Communication and Consultation number HRD-SOP02-01 which is valid on October 1, 2019. The procedure explains technically the guidelines for receiving various complaints submitted by stakeholders or other parties and the process for resolving them. Companies through their respective departments have recorded requests for information and responses. The deadline for responses to requests for information or conflicts is 1 week after the letter is received (from the Unit Head to the relevant Department). Responses are made no later than 3 weeks after the letter is received. In addition, there is a clause that guarantees the confidentiality of the whistleblower and the reporting witness. Based on the results of the document review, it is known that for the 2022 period there were only requests for information and assistance, and there were no complaints from farmers or the surrounding community. The company has also appointed officers who act as communicators between the company and the community so that people who cannot read/write can be informed by the relevant communicators.

In addition, to accommodate complaints, a suggestion box is also provided as a means of submitting complaints that can be submitted anonymously. The complaint flow is that the employee writes down the problem in the complaint book available at the estate office, then at least 2 weeks the unit leader must seek a resolution first. If it cannot be resolved, it is forwarded in writing to the head of the representative. Each stage of completion is documented and kept by the head of the representative. Based on the results of interviews with Cooperatives and FFB suppliers regarding the complaint handling mechanism, they stated that complaints can be submitted through letters or direct submissions through communication media and/or in regular meetings. The informant also stated that for the 2022 period there were no complaints, the entire cooperation process that had been going on so far was going well. Based on the results of the 2022 complaint document verification, information was obtained that there were no complaints from FFB suppliers, only Industrial Relations issues as explained in indicator 4.2.3.

**Status: Comply**

**5.2  
The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.**

**5.2.1**

The certification unit has conducted consultations with FFB supplying smallholders as shown by evidence of socialization related to RSPO certification to independent smallholders and plasma smallholders through annual meetings between the company and FFB suppliers. The company shows the Minutes of the annual meeting on November 7, 2022 which was submitted to FFB suppliers attended by 26 participants about the benefits of the RSPO, and the recommendation to register for the RSPO. In addition, there is also evidence of consultation activities with representatives of plasma farmers regarding technical aspects of field work through socialization of BMP, handling of pesticides and sprays on June 6, 2022 to 18 participants and August 8, 2022 to 21 participants. From the results of the meeting, it was stated that independent smallholders would follow the company's initiation to include their land in RSPO certification and would follow all existing requirements and regulations and are still in the process of collecting land legality data and organizational structure.

As a result of verification of the document on the implementation of the 2022 SIA management and monitoring plan, the company has submitted socialization regarding the RSPO to FFB supplying smallholders, independent smallholders and plasma smallholders. The report explains that the company has supported independent smallholders to take part in RSPO certification which has been carried out thoroughly and documented on implementation of the 2022 SIA management and monitoring plan. Based on the report, it was explained that the FFB suppliers had not been able to realize certification activities. This was due to difficulties in forming cooperatives and farmer groups to coordinate certification activities. *Based on this explanation, the company has encouraged FFB supplying*

*smallholders and independent smallholders to take part in RSPO certification which is described in the 2022 SIA management and monitoring plan implementation report and it is stated that the OFI from the previous assessment has been followed up by the company.*

**5.2.2**  
The company has made improvements to the welfare of the communities around the plantations by developing and fully managing plasma plantations and regularly conducting socialization related to RSPO certification. Currently, the management of Plasma is fully managed by the cooperative management, while the company only provides assistance to ensure that the management of oil palm cultivation is in accordance with RSPO standards. In addition, companies can also show socialization documents about best practices in oil palm cultivation, work safety, the environment, fires, benefits of RSPO, and recommendations to register for the RSPO which will be carried out on November 7, 2022, which were submitted to FFB suppliers attended by 18 participants. In addition, there is also evidence of consultation activities with representatives of plasma farmers regarding technical aspects of field work through socialization of BMP, handling of pesticides and sprays on June 6, 2022 to 18 participants and August 8, 2022 to 21 participants.

However, based on the explanation in indicator 5.2.1 which states that there are no independent smallholders who can participate in RSPO certification due to several obstacles, so far, the company has only implemented programs to improve the standard of living for farmers, only providing socialization. The results of the interview with the middleman supplier of FFB stated that the farmers who supply FFB to them already know about RSPO from the results of the socialization by the company, but the obstacles experienced are difficulties in establishing cooperatives and farmer groups to coordinate certification activities.

**5.2.3**  
Based on the explanation in indicator 5.2.1 which states that there are no independent smallholders who can participate in RSPO certification due to several obstacles, so far, the company has only implemented programs to improve the standard of living for farmers, limited to providing socialization. Regarding support to farmers to encourage the legality of FFB production only for Plasma farmers, all farmers already have legal documents where all document control is carried out in full by PT PMM and PT TJA. As for independent smallholders, support is only done indirectly in the form of data collection on the legality status of land owned by all FFB suppliers in compliance with indicator 2.3.2 where companies are required to obtain FFB from legal sources.

**5.2.4**  
When the audit was conducted, the collaboration between the certification unit and plasma was carried out with a full managed management system where the management of plasma plantations was fully managed by the Company. Because the management is carried out by the Company, all employees working on plasma plantations are workers who have been trained by the company in handling pesticides, treatments, fertilization and others. The company also continues to provide assistance in plantation management in accordance with RSPO standards. The training activities can be proven based on the minutes of pesticide training to the Agrochemical Application Officer and Cooperative management on August 9, 2022, which was attended by 18 participants.

**5.2.5**  
The unit of certification can show evidence that it has publicly reported the support program for smallholders, especially plasma farmers regarding its development which is carried out regularly. The evidence shown is based on the receipt of the 2022 LPUP Semester 2 submission document to the Agriculture Office of Kutai Kartanegara Regency on February 7, 2023 as well as the 2022 CSR Report which is publicly accessible.

**Status: Comply**

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

**6.1 Any form of discrimination is prohibited.**

**6.1.1; 6.1.2**  
Company has had a Policy Concerning on Sustainability and Business Ethics. This policy applies to all operational areas of Evans Group Indonesia. The Group's subsidiaries, employees, contractors, consultants and group's guests are required to obey the policy. The Group aims to provide fair and equal opportunities to all its workers. The company seeks to prevent discrimination in the workplace, stated specifically as follows:

- The Group provides equal opportunities for every worker to get a job and earn a decent income, as well as get career

opportunities, regardless of all forms of discrimination, namely: race, caste, nationality, ethnicity, religion, disability, gender, sexual orientation, union membership political affiliation and age.

- The Group assigns each workforce according to their skills, abilities, work experience and business and operational needs.
- The Group will not tolerate any discrimination based on sex such as role restrictions, labeling, violence, intimidation and excessive workload.
- The Group will at all times comply with laws on discrimination in the process of termination of employment, terms and conditions of employment, wages and benefits, promotion and transfer opportunities, training, recruitment and reduction of workers.

The company has also shown documentation of socialization of company policies including nondiscrimination policies, such as:

- Socialization on March 8, 2023 which was attended participants from RHM
- Socialization on February 6, 2023 which was attended participants from RHE
- Socialization on March 9, 2023 which was attended participants from PME
- Socialization on January 24, 2023 which was attended participants from BJE (KKPA)
- Etc.

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

### 6.1.3

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

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

#### **Recruitment**

- Recruitment documentation with the initials NH such as job application letters, results of health checks, ID cards, Family card and others. Company has shown probation agreement for that worker with the probation period of 3 months No. 14/SK-SKU-H/MKE/2023 on January, 9 2023.
- Recruitment documentation with the initials AR such as job application letters, results of health checks, ID cards, Family card and others. Company has shown probation agreement for that worker with the probation period of 3 months No. 021/SK-SKU-MP/Masa Percobaan/RHM/VIII/2022 on August, 11 2022. Company has also shown appointment letter for the worker with Decree No. 025/SK-SKU-H/RHM/XI/2022 on November 11, 2022.

#### **Promotion**

- Promotion of grade increase from *SKU H* to *SKU B* for 5 workers based on document Attachment 1 SE D2-001-00

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

### 6.1.4

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

### 6.1.5

The company already has a gender committee to deal with women's issues. The gender committee structure consists of a chairperson, empowerment section, etc. The structure of the gender committee also includes representatives of female and male worker.



The work program of the gender committee consists of:

- Conducting outreach/socialization related to the gender committee
- Socialization related to sexual harassments
- *Posyandu*
- And others.

The results of interviews with female workers known that the workers already know the gender committee and the functions of the organization. Workers are also aware of gender committee if there are complaints or complaints related to women's problems or issues. The results of interviews with representatives of gender committee and women workers, it was found that there were no complaints related to sexual harassment, violation etc in the last 1 year.

**6.1.6**  
The determination of wages at PT PMM and PT TJA based The Decree of the Governor of Kalimantan Timur No. 561/K.855/2022 dated December 6, 2022 concerning the Minimum Wage of Kutai Kartanegara Regency in 2023 which is Rp. 3,394.513.77.

The results of interviews and the verification of workers' wages e.g security worker with worker ID 2022058881 and ID 2022090492 (worker with same work and same grade), it is known that the company has given the same wages for the same scope of work and in the same grade.

**Status: Comply**

**6.2**  
**Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).**

**6.2.1**  
The determination of wages at PT PMM and PT TJA based The Decree of the Governor of Kalimantan Timur No. 561/K.855/2022 dated December 6, 2022 concerning the Minimum Wage of Kutai Kartanegara Regency in 2023 which is Rp. 3,394.513.77. Regarding the determination of wages at PT PMM and PT TJA, the company showed a Decree regarding the determination of wages, including:

- Decree No. 013/SK.Upah/PMM-HR/XII/2022 dated 20 December 2022 concerning Determination of Wages for SKUH 2023 for PT PMM and Decree No. 010/SK.Upah/TJA-HR/XII/2022 dated 20 December 2022 concerning Determination of Wages for SKUH 2023 for PT TJA
- Decree No. 014/SK.Upah/PMM-HR/XII/2022 dated 20 December 2022 concerning Determination of monthly employee wages and contracts for 2023 including wages scale for PT PMM and Decree No. 011/SK.Upah/TJA-HR/XII/2022 dated 20 December 2022 concerning Determination of monthly employee wages and contracts for 2023 including wages scale for PT TJA

Based on interview with workers and representatives of bipartite cooperation known that company has paid wages is accordance with applicable regulation. The type of worker are direct hires and for the scheme smallholders same as the core plantation as a status and the salary.

**6.2.2**  
Company has Company regulation 2023-2025 that was ratified by Manpower Agency, as follows:

- PT PMM → based on Letter No.SK-153/Distransnaker/TK2/500.15.15.1/01/2023 on January 19, 2023
- PT TJA → based on Letter No.SK-151/Distransnaker/TK2/500.15.15.1/01/2023 on January 19, 2023

As for the company regulation has regulated wages and work conditions, for example working time, wages, absenteeism, overtime, premiums, holidays and others.

The company has also socialized the company regulation to workers. For example:

- Minutes of the socialization of company regulation on March 8, 2023 attended by 57 participants.
- Minutes of the socialization of company regulation on January 21, 2023 attended by 187 participants.

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

- BJE → 350 workers
- BPM → 145 workers

- MKE → 226 workers
- PME → 500 workers
- RHE → 674 workers
- RHM → 101 workers
- Contractor workers for example Koperasi Mitra Sawit Mandiri (FFB transporter) → 23 workers

The auditor team has simulated the calculation of workers' wages by verifying payroll documents for example on February 2023. For example, workers with initial DKP (pressing operator) and initial AM (harvester). From the verification results, it is known that the company has paid wages according to the applicable regulations. Based on the document verification and interview with labor union and workers also known that deduction for workers such as BPJS deduction, tax and etc that has been described in the company regulation. In addition, the company also shows payroll documents that provide information related to compensation for all work performance. Based on interview with workers and labor union representatives known that company has paid wages is accordance with applicable regulation.

### 6.2.3

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

- Payroll documentation that gives information on compensation for work performance. The results of the simulation of wages and overtime in February 2023 for example with worker with initial DKP (pressing operator), known that the company has paid overtime wages according to the workers' overtime hours and has complied with the applicable regulations.
- Pay slip document has informed deductions, working days, leave and others.
- Employee leave forms, such as:
  - Annual leave form with worker initial TF which is leave for 3 days on 27 – 29 December 2022
  - Maternity leave form with worker initial RN which is leave for 90 days on 15 October 2022 – 12 January 2023

Based on document verification, interview with workers (harvesting workers, manuring workers, factory workers, etc.) known that there's no indication about the force labor. In addition, they get the wage accordance with the wage minimum regulation. Based on interview with harvester and wage simulation, known that harvest workers' wages are based on their work (base/target). If the worker gets the base/target, then he gets a premium, and if the worker does not get the base/target but has worked for 7 hours, then the worker gets 1 working day's wages (worth the minimum wage per day).

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

### 6.2.4

The results of field observations in housing areas and interviews with workers and representatives of bipartite known that the company has provided housing facilities, infrastructure and facilities that are decent/in good condition to workers such as houses, clean water facilities, drinking water, religious facilities, sports, clinic and others. The condition of the house is permanent and has good sanitation. From the interview, also known that in each housing location there are child care areas, trash bins, electrical and others.

### 6.2.5

The results of interviews with employees and representatives of bipartite, known that there are sellers of foodstuffs especially for vegetables and side dishes that enter the plantation area on a regular basis. The company also provides an employee cooperative that provides workers' daily needs including food. Based on the results of interviews with residents of housing and workers, it was stated that workers had obtaining adequate food sources at competitive prices.

### 6.2.6

The determination of wages at PT PMM and PT TJA based The Decree of the Governor of Kalimantan Timur No. 561/K.855/2022 dated December 6, 2022 concerning the Minimum Wage of Kutai Kartanegara Regency in 2023 which is Rp. 3,394.513.77.

In relation to DLW (Decent Living Wage), the company has tried to do Prevailing Wage calculations for each unit, which included samples of In-Kind Benefits, such as Housing, electricity for home, water, education, etc. As for the amount of Prevailing wage is Rp.

3,729,915. DLW calculation is based on actual and rational price at certification unit location.

**6.2.7**  
Based on the results of verification of employment documents, interviews with management and representatives of bipartite and also field observations, it is known that workers for the main jobs such as harvesting and factory operations, have been carried out by permanent workers and no daily/ contract /temporary worker.

**Status: Comply**

**6.3**  
**The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.**

**6.3.1; 6.3.2; 6.3.3**

Company has had a Policy Concerning on Sustainability and Business Ethics which available in Bahasa. This policy applies to all operational areas of Evans Group Indonesia. The Group's subsidiaries, employees, contractors, consultants and group's guests are required to obey the policy. 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. It specifically explained:

- The Group provides opportunities for all workers to establish free, open, independent, democratic and responsible trade unions and to register these unions with the relevant legal authorities
- The group gives all workers the option to become union members or not without coercion from any party
- The Group recognizes employees' rights to freedom of association and assembly

The company has also shown documentation of socialization of company policies including freedom of association policies, such as:

- Socialization on March 8, 2023 which was attended participants from RHM
- Socialization on February 6, 2023 which was attended participants from RHE
- Socialization on March 9, 2023 which was attended participants from PME
- Socialization on January 24, 2023 which was attended participants from BJE (KKPA)
- Etc.

The results of interviews with workers such as harvesters, factory workers and others, known that the company has provided socialization related to freedom of association

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

- Minutes of meeting on November 13, 2021
- Minutes of meeting on January 7, 2023

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

**Status: Comply**

**6.4**  
**Children are not employed or exploited.**

**6.4.1; 6.4.2; 6.4.3; 6.4.4**

The company has a policy on Sustainability and Business Ethics in July 2019 which among other things explains the prohibition of child labor, namely:

- The Group prohibits the use of child labor in all of its own operations and by its suppliers;
- The minimum age to work for the Group is 18 years, unless the job is part of the school curriculum
- The Group permits the employment of persons aged 14-17 only if this is approved by the statutory authority and forms part of the school curriculum, or their participation in a vocational orientation certification or training program
- Contractors, contract workers and volunteers working with the Group are subject to the Group's minimum age limit.
- The Group will provide access to school, or transportation to school, for employees' children under 18 years of age.

T The company has also shown documentation of socialization of company policies including prohibition on employing children under 18 years old, forced labor and workers from human trafficking, such as:

- Socialization on March 8, 2023 which was attended participants from RHM
- Socialization on February 6, 2023 which was attended participants from RHE
- Socialization on March 9, 2023 which was attended participants from PME
- Socialization on January 24, 2023 which was attended participants from BJE (KKPA)
- Etc

The company has also shown agreement with contractors that have explained the prohibition on employing children under 18 years of age, forced labor and workers from human trafficking, for example Agreement for FFB and Loose fruit transporter with Koperasi Mitra Sawit Mandiri No. PMM/PME/01/2023/005-Angkut TBS & Brondol dated January,2 2023 and Agreement with FFB transporter with CV Virendra Putra No. TJA/RHE/03/2023/045 dated March 1, 2023

The results of the verification of the labor list document, interviews with internal and external stakeholders, and field observations revealed that there was no indication of any workers under the age of 18.

**Status: Comply**

**6.5**

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

**6.5.1; 6.5.2**

Company had a Policy Concerning on Sustainability and Business Ethics. This policy applies to all operational areas of Evans Group Indonesia. The Group's subsidiaries, employees, contractors, consultants and group's guests are required to obey the policy. It stated that sexual harassment is unwanted sexual behavior that violates a person's dignity so that the person feels intimidated, humiliated or humiliated, or creates enmity and environmental unrest. The Group is deeply committed to creating and maintaining a work environment free of sexual harassment.

- The Group will carefully investigate every case of sexual harassment in its operational activities that are reported to it;
- The Group will submit a reasonable sexual harassment case to the appropriate authority for legal action; if proven, his party will take firm action, such as termination of employment against employees who are found guilty of this violation.

The Group will protect women's reproductive rights according to the laws of the countries where they work, specifically stated as follows:

- The Group will provide special dispensation to female workers who suffer from menstrual pain, who are pregnant or breastfeeding in accordance with the rules and regulations of the country where they work;
- The Group will provide guidance and education on reproductive health and fertility to workers and their families with the help of professional medical staff;
- The Group will not allow pregnant employees to perform high-risk work that threatens the safety of the mother and / or child, such as lifting heavy loads, operating heavy equipment and handling chemicals such as pesticides, herbicides, fertilizers and laboratory chemicals;
- The group will assign pregnant employees to suitable temporary jobs; it will not use employees' reproductive rights such as pregnancy, childbirth, miscarriage, breastfeeding and other reproductive conditions, as a reason for demotion or termination of employment.

The company has also shown documentation of socialization of company policy or procedure, such as:

- Socialization on March 8, 2023 which was attended participants from RHM
- Socialization on February 6, 2023 which was attended participants from RHE
- Socialization on March 9, 2023 which was attended participants from PME
- Socialization on January 24, 2023 which was attended participants from BJE (KKPA)
- Etc.

The results of interviews with workers, especially female workers, revealed that the company had provided socialization related to policies to prevent sexual harassment and violence and protect reproductive rights. The company already has a gender committee to

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

**6.5.3**  
The company has identified the needs of new mothers in January 2023. The needs of new mothers based on the identification results are as follows:

- The company provides a place for mothers to breastfeed
- The company provides opportunities/time for mothers to breastfeed to be able to give exclusive breastfeeding

Based on interview with gender committee and female worker known that company has given permission to new mother to breastfeed. Besides that, based on observation at daycare in housing complex, known that company has provided special room for mothers to breastfeed.

**6.5.4**  
The company already has a mechanism for submitting complaints to both internal and external parties as outlined in several SOPs as follows:

The company already has a mechanism for submitting complaints to both internal and external parties as outlined in several SOPs as follows:

- SOP No. HRD-SOP15-01 dated on 03 February 2020 concerning in handling any dispute. The policy explained activities of dispute identification, dispute analysis, dispute management planning, dispute handling implementation, monitoring, evaluation, and reporting.
- SOP No. HRD-SOP02-01 dated on October,10 2019 concerning in handling internal and external complaints. The policy explained about the company's procedure of handling and documenting any complaints.
- SOP No.PMM/SOP/General-22 Revision 2, dated 27 April 2015 concerning Communication and Consultation. The procedure describes the mechanism for communication and consultation between the company and internal and external stakeholders. Stakeholders can submit complaints or communicate with the company through the PIC that has been appointed by the company. Thus, stakeholders who cannot read or write can submit complaints to the PIC to be recorded by the PIC.
- Whistleblower system. It described that if there were any requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).

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

**Status: Comply**

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

**6.6.1; 6.6.2**  
The results of the verification of the labor register documents, interviews with representatives of bipartite, workers, Manpower Office and also field observation revealed that there were no casual daily workers/contract workers/temporary workers in the company. There are only permanent workers at PT PMM & PT TJA. From the results of interviews with workers and representatives of bipartite, known that there is no forced labor in the company. All workers who work are in accordance with the mutually agreed agreement or letter of appointment.

**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**  
Unit certifications show the OHS Committee Decree Team endorsement by the relevant agency, as follows:

PT Prima Mitrajaya Mandiri

- The OHS Committee structure of PT PMM Plantation which was approved by the East Kalimantan Province Manpower and Transmigration Office on March 10, 2023 with approval no: 500.15.18.5/1231/DTKT-III consists of Chairman: HMD (initials) and Secretary: P.F.N (initials).

- OHS Committee structure of PT PMM Bumi Permai Mill and Rahayu Bulking which was approved by the East Kalimantan Province Manpower and Transmigration Office on March 10, 2023 with approval no: 500.15.18.5/1230/DTKT-III consisting of Chairman: MRD (initials) and Secretary: P.F.N (initials).
- OHS Expert Authority Certificate available in the name of P.F.N (initials), with No 5/12135/AS.01.03/IX/2022, valid until September 5, 2025.

**PT Teguh Jayaprima Abadi**

- PT TJA Plantation's OHS Committee structure which was approved by the East Kalimantan Province Manpower and Transmigration Office on March 10, 2023 with approval no: 500.15.18.5/1236/DTKT-III consisting of Chairman: A.A.A (initials) and Secretary: S.M (initials).
- PT TJA Rahayu Mill OHS Committee structure which was approved by the East Kalimantan Province Manpower and Transmigration Office on March 10, 2023 with approval no: 500.15.18.5/1225/DTKT-III consisting of Chairman: AFR (initials) and Secretary: S.M (initials).
- Availability of OHS Expert Authority Card in the name of S.M (initials), with No 5/12480/AS.01.03/IX/2022, valid until September 5, 2025.

The company also shows recordings of OHS Committee meetings which are routinely held every month. For example the OHS Committee meeting at Bumi Permai Mill in December 2022 which was held on January 27, 2023 which was attended by 7 OHS Committee members. During the meeting, including data on work accidents and lost work time, accident statistics (Incident Rate and Severity Rate) and OHS Work Program.

Based on the explanation above, it is known that an OHS organization has been formed with an adequate number of personnel in accordance with the laws and regulations.

**6.7.2**

The company has procedures related to preparedness and emergency response numbers which are contained in the document: OSH-SOP07-01 dated October 1, 2019 concerning Emergency Handling which briefly describes the handling of emergencies (Mill, housing, office and warehouse fires; land and forest; Explosions; Natural Disasters; Riots; Exposed to chemical hazards; Accidents of leakage and spillage of waste; and other emergencies). The Mills and Plantations Offices are also equipped with evacuation routes and gathering points during emergencies.

There are workers assigned to the field and other work locations and have received First Aid Training (P3K), for example: Patria Fajar Nanda with certificate No. 5/37613/AS.02.02/XII/2021 dated 31 December 2021. Based on the results of the field visit at the Mill and Estate, it is known that the company already has a first aid kit in good condition and monitoring its adequacy in accordance with the laws and regulations.

**6.7.3**

The certification unit show documents related to the provision of PPE in the document SOP for Personal Protective Equipment (PPE) Number IDN-OSH-SOP02-03 dated 24 May 2022. The guideline states that for PPE that has been damaged/cannot function properly before the predetermined replacement frequency, can request a replacement by bringing the old PPE and getting approval from their respective superiors.

In the context of implementing these regulations, the Company provides adequate Personal Protective Equipment (PPE) according to its designation for each worker, which is shown as follows:

- Record of Handover of PPE for Harvesters and Beringin Jaya Estate KKPA Beringin Jaya Estate on June 18, 2022. PPE in the form of boots to 10 harvesting employees and 5 stragglers.
- Record of Handover of PPE Manuring for Beringin Jaya Estate on 20 August 2023. PPE in the form of Apron and Rubber Glover for 9 employees.

In line with the results of document verification, the spray workers in the J33 Prima Estate block also explained that employees had received PPE free of charge by the company and understood the mechanism for replacing PPE if PPE was damaged/lost. The PPE used by workers is currently in good condition and ready to use.

The auditor made field observations at the PPE Warehouse at the Bumi Palma Mill, knowing that the company had provided spare PPE, including:

- PPE Ear Plugs, total 57 pieces.
- PPE Safety Boots, total 18 pairs.

Based on the explanation above, it is known that the certification unit provide adequate Personal Protective Equipment (PPE) in accordance with its designation for each worker.

**Sanitation Facilities**

Based on the results of the field visit, it is known that the company already has sanitation facilities for workers with chemicals that can clean themselves as well as the equipment used and change clothes, which is also equipped with a storage area for controlling devices and PPE, this is in accordance with the results of interviews with 4 spray workers for example in Block J33 Prima Estate.

**6.7.4**

The company have Collective Labor Agreement that describe about workers have the right to receive medical care and be protected by the accident insurance. The management unit show proof of payment of Employment and Health Insurance (*BPJS Kesehatan dan Ketenagakerjaan*) for all workers. Payments are made every month by percentage according to the regulation. The last payment that has been paid by certification unit is on February 10, 2023 for “BPJS *Ketenagakerjaan*” period of January 2023 and on February 10, 2023 for “BPJS *Kesehatan*” period of February 2023. All proof of payment shown and payment details for the “BPJS *Ketenagakerjaan* and *Kesehatan*” program are in accordance with the current actual conditions / in accordance with the number of existing workers.

Based on the interview with representative of worker union, estate and mill workers, concluded that all employees were aware of the medical service procedures in the event of an accident or illness. All employees interviewed also claimed to have a health insurance (*BPJS Kesehatan*) card, if they went to a company clinic there was no fee at all. Based on the foregoing, it can be concluded that the company already has a list of employees participating in the Employment and Health Insurance (*BPJS Kesehatan dan Ketenagakerjaan*) program along with proof of monthly payments.

**6.7.5**

Work accidents are recorded using the Lost Time Accident (LTA) listed in the Accident Statistic Period 2022 document for January – December 2022, which among others explains the number of accident cases, the number of days lost, Frequency Rate (FR) and Severity Rate (SR), among others as follows: following:

PT PMM

UNIT	TOTAL WORK HOUR	CASE	FR	SR
Estate	1,669,743	35 with lost working days 65	4.01	6.33
Mill	452,120	1 with lost working days 0	0.44	0.00

PT TJA

UNIT	TOTAL WORK HOUR	CASE	FR	SR
Estate	1,309,119	35 with lost working days 44	5.35	6.72
Mill	272,934	3 with lost working days 4	2.20	2.93

From the document above, the company has also carried out an investigation into work accidents that occurred as well as processing claims.

Based on verification document, the company can show proof of work accident claims to agencies related to the conditions of work accidents experienced by workers during 2022. Furthermore, it is known that the management unit carries out work accident investigations and makes claims to *BPJS Ketenagakerjaan* in accordance with established procedures.

**Status: Comply**

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

**7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated**

**Pest Management (IPM) techniques.**

**7.1.1**  
The certification unit has an SOP for controlling weeds, pests and diseases with document number AGR-SOP07-01 which is valid starting March 3, 2020. Weed control is carried out biologically, manually and chemically. Pest and disease control is carried out in procedures, including leaf-eating beetles and grasshoppers, fruit borer caterpillars, termites, *Oryctes rhinoceros*, Rats, Pigs, Elephants, UPDKS, root rot and scion, shoot rot, and bunch rot.

The company has documented the implementation of *OPT* observation and control which consists of:  
Pest Early Detection and Census System

The company has identification of plant pests such as rats and caterpillars that eat oil palm leaves. Companies can show documentation of an early detection system for *OPT* attacks, for example as follows:

- Based on the UPDKS pest detection summary document January – December 2022, it is known that there are no symptoms of UPDKS attack on all plantations.
- Based on the rat census summary document from January to December 2022, it is known that the level of attack is still below the threshold.
- Based on the results of the pest detection and census above, it is known that there is no pest attack that exceeds the threshold, so there is no chemical control. Control of rats was carried out biologically (with owls) and chemically (with rodenticides if attack was > 5%). Meanwhile, termite control is carried out chemically using termiticides, with application every month if the attack is > 4 staples / Ha and application every 2 months if the attack is <4 staples / Ha.

Based on observations of harvesting activities in the Prima Estate and Mahakam Estate estates, the auditors did not find any significant signs of rat infestation in the fruits collected at the TPH and symptoms of leaf-eating caterpillar attacks on the palm fronds.

**Pest control**

- The company also controls *UPDKS* pests by planting and maintaining host plants for natural enemies of *UPDKS* pests such as *Turnera subulata*. Based on field observations, it can be seen that along the main canal and collecting canal the *Turnera subulata* plant is indeed well developed. Records of the progress of planting host plants for natural enemies of pests such as *Turnera* and *Antigonon* are also shown.
- The company has also developed a natural enemy of rats, namely owls, as a form of biological control by building owl nests. The auditors conducted a field visit to the owl farm at Lembuswana Estate, the captive conditions are very good, and the company is developing the owl population as a natural enemy of rats.

**7.1.2**  
Results Based on document review and visits, it is known that the company uses species control agents including: *tyto alba*, *turnera subulata*, *cassia cobanensis*, and *antigonon leptopus* which species are not invasive according to the Minister of Environment and Forestry Regulation no. P.94/MENLHK/SEKJEN/KUM.1/12/2016.

**7.1.3**  
Based on information from management unit interviews, document review and field observations, procedures for pest control policies at PT PMM and PT TJA have been available as well as results from interviews with workers in the field during the assessment activities, it is known that the company does not use fire in pest control.

**Status: Comply**

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

**7.2.1 – 7.2.3**  
The company has documented records of pesticide toxicity in the document of Monitoring Pesticide Use 2022. The document is recorded product name, active ingredients, LD50, percentage of active ingredients, total application and total active ingredients. This document is constantly recorded and updated by management officer each month.

The company has a policy to reduce the use of pesticides which is contained in the document "Sustainability Policy and Ethical Behavior". In the Occupational Safety and Health section it is explained that the Group intends to eliminate the use of pesticides that are categorized by the World Health Organization as class 1A or 1B, or those registered by the Stockholm or Rotterdam conventions



and will not use paraquat. Based on document review and field observation, several IPM program with biological approach that has been implemented such as nettle eater caterpillar by planting beneficial plant such as *Turnera subulata* and *Antigonon leptosus*. Moreover, the company has also conducted early detection routinely listed in the monthly report of early warning system.

The company shows records of pesticide use, with the following examples:

Beringin Jaya Estate

Pesticides	Unit	Year 2021		Year 2022	
		Application Area	Usage	Application Area	Usage
<i>Isoprophyl Amina</i>	Liter	618.07	373.75	3,229.08	578.23
<i>Glyphosate</i>					
<i>Methyl Metsulfuron</i>	Liter	10.31	11.31	3,229.08	25.54
<i>Triclophyr Butoksi</i>	Liter	-	0,00	3,229.08	4.25
<i>Ethyl Esther</i>					

Based on a review of the pesticide use documents, it is known that the use of the pesticide Isoprophyl Amina Glyphosate has increased due to the increased number of application areas due to the area experiencing flooding so that the job rotation shifts to 2022.

Based on the results of document review and field visits, it is known that the company has utilized beneficial plants and natural enemies of pests as a method of reducing pesticide use.

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

**7.2.4**

There is no prophylactic way of using pesticides carried out by the company. The company controls using pesticides if the pest attack census shows results above the threshold. Whereas for weed control If the conditions of the circle and harvest pathway are still quite standard, weed control will be postponed. Based on observations of spraying activities, the application method is not a preventive application but is more selective for locations that have weeds.

**7.2.5**

Based on the results of the study of data on pesticide use for all units of the Estate, it is known that there is no use of pesticides that are included in the World Health Organization (WHO) Class 1A or 1B list or included in the Stockholm or Rotterdam Conventions, as well as paraquat.

**7.2.6**

Pesticide applicators are special people who have been equipped with competencies regarding pesticide handling. Evidence of this can be seen from:

- Mahakam Estate spray team training report on May 18, 2022 which was attended by 6 participants.
- Prima Estate spray team training report on May 19 – 20, 2022 which was attended by 15 participants.
- Rahayu Estate spray team training report on May 17, 2022 which was attended by 40 participants.

In the minutes of note, the material provided included pesticide regulations and licensing, understanding of MSDS, prevention of poisoning, and how to handle pesticides and the principles of pesticide application. The guest speaker was the Evans Indonesia RnD team and PT Corteva Agriscience. All the MSDS are available in Bahasa Indonesia.

Based on field observation and interview to spraying applicator that informed can demonstrated dan understanding of the hazards dan risk related used of the chemicals and wearing PPE based on spraying risk assessment.

**7.2.7**

SOP for Storage and Mixing of Chemicals (No. TJA/SOP/Umum-17 or PMM/SOP/General-17 dated 1 January 2011). The procedure describes, among others, as follows:

- Chemicals are stored and arranged neatly in the chemical storage warehouse.
- Chemical storerooms must be well ventilated and locked when not in use.

- There must be data recording of chemicals contained in the storage warehouse.
- Chemical name label must be printed on each package.
- There must be signs or signs such as "Poisonous", "Flammable" and other similar signs affixed to the walls of the chemical storage warehouse.
- There must be an MSDS or CSDS in the chemical storage area.
- There must be an extinguisher and a first aid kit.
- Must wear PPE when entering the warehouse.
- Only officers and authorized persons are allowed to enter the warehouse.
- Must be equipped with a chemical spill container.

Based on observations at the pesticide storage warehouses at Prima Estate, Beringin Jaya Estate and Rahayu Estate, all stored pesticides are in accordance with the use of best practices, pesticide storage has been adjusted according to its type, liquid pesticides are stored at the bottom, each pesticide is stored according to its group.

#### 7.2.8

The company can show documents for recording and monitoring used pesticide containers using a logbook. In addition, the company also has an SOP for the Management of Hazardous and Toxic Waste No. SUS-SOP08-01 which was ratified on October 1, 2019. The SOP describes the pesticide storage mechanism that is carried out according to the recommendations provided in the MSDS, the placement of chemicals that have non-toxic characteristics. similar types must be separated according to MSDS recommendations, preparation and release of chemicals is carried out first in first out (FIFO), chemical containers must have labels, chemicals are only issued on request approved by the authorities and records of storage and release of agrochemicals (including pesticides) are well documented. The company has also socialized to agrochemical application officers regarding the ban on the use of hazardous waste packaging including used pesticide packaging on August 8, 2022.

Based on field observations in agrochemical warehouses and hazardous waste storage areas in Beringin Jaya estate and Mahakam Estate, it is known that the pesticide storage area is well managed, oil traps are available, adequate air ducts are isolated. Used pesticide packages classified as Hazardous Waste were also found stored in a well-monitored Hazardous Waste storage warehouse which was then handed over to licensed collectors.

Based on interviews with pesticide application officers at Beringin Jaya estate and Mahakam Estate, it was found that all used pesticide packaging containers were returned and sent to the Hazardous Waste Warehouse and not used for any other purpose other than pesticide application activities. All used packaging containers, work tools and work clothes are stored in a special storage area, so that no contaminated items are taken home. The results of observations in the employee housing area showed that there was no reused pesticide packaging.

#### 7.2.9

Based on the document review, interviews with sprayer applicators and interviews with company representatives, it is known that the application of pesticides by air has never been carried out. In addition, the certification unit also does not have the facilities and infrastructure to apply pesticides through the air.

#### 7.2.10

The last medical examination carried out for pesticide and chemical handlers was carried out on October 2022 for 136 workers related to chemicals in PT PMM and PT TJA. All worker's spray has examined health through inspection types of *cholinesterase* to ascertain the condition of workers in good health/normal. The results of interviews with pesticide operators in Spray Circle & Path, Block J33 Prima Estate that all pesticide operators have been checked health periodically and workers have known the results of the examination. From the results of the examination, all workers fit to work.

#### 7.2.11

During the audit, the pesticide application conducted at estate area to control weeds in the circle and path. Based on field observation and interview with pesticides applicator known that there was no worker age under 18 years old that worked in chemical activity. The pregnant and breastfeeding women prohibited to work in chemical. The monitoring conducted through monthly pregnancy test. If founded expectant mother, she will be transferred to light non chemical activity.

Based on list of sprayer workers, Spray workers at PT PMM and PT TJA are all male and none are female.

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 waste resulting from operational activities contained in the Hazardous and Toxic Waste Source Inventory document. The identification is grouped based on the activity that generates the waste, the name of the waste, the code of the waste, the type of solid or liquid, and its management. The determination and classification of waste codes uses the reference to Government Regulation number 101 of 2014. The company also has several procedures related to waste management and utilization which are listed in several documents, including:

- SOP for Management of Hazardous and Toxic Waste number SUS-SOP08-01 dated October 1, 2019.
- SOP for Polyclinic Waste Handling number PMM/SOP/K3-09 dated January 1, 2011.
- SOP for Residential and Office Waste Management number PMM/SOP/K3-10 dated January 1, 2011.
- SOP for Compost Application number AGR-SOP14-01 dated March 3, 2020.
- SOP for Palm Oil Mill Liquid Waste Application number AGR-SOP15-01 dated March 3, 2020.
- Mill SOP for boiler station and engine room number SOP/41/11 which has been in effect since March 2011. The document explains that fiber and shells are used as boiler fuel.
- SOP Biogas Plan number SOP/4.1/019 dated October 1, 2012, describes the microbiological process carried out to capture biogas that appears so that it can be converted into an energy source (methane capture).

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 the management of hazardous and toxic waste, the company does not reuse it but only temporarily stores it located in the Mill and Estate. The company also has a hazardous waste storage area that has permits, including:

- Hazardous Waste Management Permit for temporary storage activities for Kahoi Estate based on the Decree of *DPMPTSP* Kutai Kartanegara Regency Number P-660.4/038/DPMPTSP/III.3-1/TPSLB3/03/2019 dated March 26, 2019 and is valid for 5 years.
- Hazardous Waste Management Permit for temporary storage activities for Bumi Permai Estate based on the Decree of *DPMPTSP* Kutai Kartanegara Regency Number P-660.4/039/DPMPTSP/III.3-1/TPSLB3/03/2019 dated March 26, 2019 and is valid for 5 years.
- Hazardous Waste Management Permit for temporary storage activities for Muara Wis Estate based on *DPMPTSP* Decree of Kutai Kartanegara Regency Number P-660.4/038/DPMPTSP/III.3-1/TPSLB3/03/2019 dated March 26, 2019 and is valid for 5 years. Currently, Muara Wis Estate is incorporated into the Beringin Jaya Estate.
- Hazardous Waste Management Permit for temporary storage activities for Mahakam Estate based on *DPMPTSP* Decree of Kutai Kartanegara Regency Number P-660.4/036/DPMPTSP/III.3-1/TPSLB3/03/2019 dated March 26, 2019 and is valid for 5 years.
- Hazardous Waste Management Permit for temporary storage activities for Rahayu Estate based on the Decree of *DPMPTSP* Kutai Kartanegara Regency Number P-660.4/037/DPMPTSP/III.3-1/TPSLB3/03/2019 dated March 26, 2019 and is valid for 5 years.
- Permit for Hazardous Waste Management for temporary storage activities for PT Buana Wiralestari Mas – Bumi Permai Mill based on the Decree of the Regent of Kutai Kartanegara Number P660.1/129/BLHD-I/2016 dated 27 June 2016 and is valid for 5 years. The permit has expired, and the progress has been explained in indicator 2.1.1.

The waste stored in the temporary storage warehouse will then be transported by a licensed party every 3 months. The latest transportation is proven through the Electronic Manifest document and the official report of the transportation carried out on December 18, 2022 by PT Karunia Lumasindo Pratama which is a licensed party. The company can show a cooperation agreement with the carrier, which is based on the MoU document Number 006/K.DIR.PMM/LB3&MEDIS/III/2021 dated March 22, 2021 and is valid for 2 years. 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, a valid Business Identification Number and a Cooperation Agreement between the carrier and the licensed processor and/or beneficiary.

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 Manifest, balance sheet, and logbook. Based on the results of the

document review by comparing the manifest, the balance sheet and the logbook, it can be seen that the data on waste transported on December 18, 2022 was in accordance with the data recorded in the balance sheet and logbook for the period before the transportation was carried out. Similarly, the comparison between the months after the transportation was carried out (19 September 2022) starting from empty. The company records all waste that enters and leaves the storage warehouse properly so that waste management data can be tracked easily and there are no recording differences. The company has also reported the results of hazardous waste management which is carried out every quarter with evidence of the PT PMM and PT TJA Hazardous Waste Management Reports for the Quarter IV 2022 period which was reported to the Environmental Service of Kutai Kartanegara Regency on February 4, 2023.

The results of field visits to hazardous waste storage warehouses at Beringin Jaya Estate and Rahayu POM Estate also show that the company has carried out hazardous waste management quite well. All obligations listed in the waste storage permit have been fulfilled, such as the availability of fire extinguishers, showers, eyewash, coordinates, alarms, first aid kits, oil traps and appropriate labeling. In addition to good lighting and air ventilation, the company also has drainage channels on the outside of the warehouse to anticipate pollution to the surrounding environment.

Regarding OFI on surveillance 1.1 regarding infectious waste management (storage procedures) in accordance with the regulation of the Minister of Environment and Forestry No. P.56 of 2015. The company has carried out infectious waste management as stipulated in the regulation by providing a refrigerator, this can be proven based on field observations at Kahoi Estate where the refrigerator is in a special room in the clinic area. Sedangkan untuk OFI surveillance 1.3 pada kegiatan surveillance 1.4 the domestic waste and hazardous waste are found that are placed in proper storage areas with the procedure. In addition, the company also routinely monitors hazardous waste every month which is carried out in conjunction with OHS inspections. *The company has followed up OFI on the previous assessment and it has been declared fulfilled.*

#### **Non-Hazardous and Toxic Waste**

Non-hazardous waste such as domestic waste and used fertilizer sacks is managed in the form of reuse for goods that can still be used. In addition, waste that cannot be reused will be collected, if it still has economic value such as scrap metal and used tires, it will be sold to parties who cooperate with the company. Non-hazardous waste that cannot be reused will be disposed of in landfills. Transportation of non-hazardous waste from employee housing or emplacement areas is carried out twice a week using dump trucks and immediately disposed of in landfills, and when the landfill is full, stockpiling will be carried out and a signboard marking the opening and closing dates will be installed. The company has a policy regarding the prohibition of burning waste, including in landfill areas.

The results of field observations in the landfill and emplacement area showed that there were no traces of combustion, all domestic waste was disposed of in waste collection tanks scattered throughout the building with the classification of organic and inorganic waste types. The results of interviews with residents of the emplacement also stated that the company routinely carried out socialization related to domestic waste management, either directly through meetings, or indirectly by installing signboards prohibiting burning trash and littering.

#### **Liquid, Solid and Air Waste**

Solid waste from the FFB processing process in the form of shells and fiber is reused by the company as a substitute for fossil fuels (Solar) for power generation in boilers, while for empty fruit bunches, composting is used to substitute fertilizer for the land. Some of the solid waste in the form of shells is also sent or sold, while for the empty bunch, some is given to the community as plasma plantation management to be used as fertilizer. Data on solid waste utilization is explained in more detail in indicator 7.9.1.

The company also uses POME to be applied to the Land Application for fertilizer substitution. The regulation and management of Land Application are explained in more detail in indicator 7.8.3. As for air waste, the company has made use of it using Methane Capture (Biogas Plan). In addition, this management is related to air waste, namely by measuring air quality originating from waste-producing sources such as WWTP, Boilers and Gensets.

#### **7.3.2**

Based on interviews with the Managers and Officer of the Bumi Permai Mill and Beringin Jaya Estate Hazardous Waste Warehouse, it is known that they have an understanding of the handling of waste disposal, especially hazardous waste and domestic waste, as well as hazardous waste management in accordance with company procedures. The results of interviews with workers living in the company's area also stated that the waste management carried out by the company was very good and regular. Trash cans are provided properly, all waste disposal facilities have also been provided by the company such as organic and non-organic waste bins

that will be replaced if damaged, hazardous waste warehouses and landfills. The resource persons also understand very well how to separate the types of waste they produce and what types of waste should not be reused. The respondent's understanding of waste management is the result of routine and consistent socialization and training as evidenced by the minutes that were held on 7 November 2022 to all staff and employees of Rahayu Estate and Beringin Jaya Estate. Field observations in the housing complex area of Rahayu Estate and Beringin Jaya Estate also showed that the housing conditions were quite clean and there was not a lot of garbage lying around.

**7.3.3**

The company does not carry out open burning to destroy waste, this can be proven from field observations in residential areas and Landfills in Rahayu Estate and Beringin Jaya Estate that there are no traces of burned waste. The results of interviews with employees also stated that they had never burned waste, because they were aware of the prohibition on burning activities and the sanctions they would receive if they burned them. Organic waste from housing and inorganic waste is disposed of in the bins that have been provided, then transported every 2 times a week and disposed of in landfills and then buried when it is full. The results of field observations in employee housing areas also show many warnings to prohibit waste burning activities as well as the dangers that can arise from burning activities. Interviews with management also explained that the regulations regarding the prohibition of burning have been understood by all workers and strict action would be taken if they violated them.

**Status: 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 – 7.4.3**

The company already has a soil fertility management strategy, including:

- Fertilization Procedure, document number AGR-SOP09-01, effective date March 3, 2020. This procedure explains, among other things, that fertilizer recommendations are determined by considering the nutrient status in the leaves, the ability of the soil to provide nutrients, nutrients lost due to washing, plant conditions, climate and implementation of the previous year. Recommendations for TM fertilization are made based on leaf sample analysis (Leaf Sampling Unit) set out in the Technical Manual for Oil Palm Cultivation and fertilization recommendations issued by the Agronomist.

The soil fertility management strategy carried out by the certification unit includes implementing the following fertilization:

**Leaf Analysis**

**PT PMM**

- Beringin Jaya Estate Leaf Analysis Number 060/RD/EXT/L/MEI/2022 dated May 20, 2022 issued by PT Nusa Pusaka Kencana Analytical & QC Laboratory for a total of 15 samples. The parameters analyzed include Ash, N, P, K Mg, Ca, B, Cu, Zn, Mn, Fe, S and Cl.

**PT TJA**

- Mahakam Estate Leaf Analysis Number 061/RD/EXT/L/MEI/2022 dated May 20, 2022 issued by PT Nusa Pusaka Kencana Analytical & QC Laboratory for a total of 25 samples. The parameters analyzed include Ash, N, P, K Mg, Ca, B, Cu, Zn, Mn, Fe, S and Cl.

**Soil analysis**

**PT PMM**

- Soil Analysis Number 162/LHU/KT/GEL/XII/2022 dated December 31, 2022 issued by PT Global Environment Laboratory for a total of 24 samples. The parameters analyzed include Silt, Pb, Cd, Cu and Zn.

**PT TJA**

- Soil Analysis Number 163/LHU/KT/GEL/XII/2022 dated December 31, 2022 issued by PT Global Environment Laboratory for a total of 16 samples. The parameters analyzed include Silt, Pb, Cd, Cu and Zn.

The company shows the results of fertilization recommendations in 2022. The types of fertilizers used are Urea, RP, TSP, MOP, Kieserite, Borate, Dolomite and NPK. The results of inspection of fertilization activity documents for the period from January to December 2022 in each plantation are in accordance with the recommended dosage. Records of fertilization activities are properly recorded and recorded by the company which explains the type of fertilizer, number of workers, work performance, and dosage used, for example in Prima Estate for the type of urea fertilizer there is a 2022 program of 156.90 tons and 156.90 tons have been realized and in Mahakam The estate for this type of urea fertilizer has a program in 2022 of 104.07 tons, 104.07 tons of which have been

realized.

The unit of certification also utilize Mill waste for fertilizer. Data on the recapitulation of solid waste utilization for fertilizer for the period January - December are as follows:

- FFB Processed 287,513.16 Tons
- Empty fruit bunch utilized 71,001.67 Tons
- The liquid waste used is 165,398 M3

Based on the results of interviews and document verification, it shows that the empty fruit bunches are used to substitute fertilizer by applying it to the land. The company also utilizes liquid waste which is used to substitute fertilizer into the land through Land Application. All of the waste is utilized and data on its use is recorded in detail and traceable.

Based on information from interviews and document reviews, there are already available nutrient recycling strategies, which can include recycling empty fruit bunches, Mill liquid waste, palm oil residue, as well as optimizing non-organic fertilizers.

**7.4.4**  
The company shows the results of fertilization recommendations in 2022. The types of fertilizers used are Urea, RP, TSP, MOP, Kieserite, Borate, Dolomite and NPK. The results of inspection of fertilization activity documents for the period from January to December 2022 in each plantation are in accordance with the recommended dosage. Records of fertilization activities are properly recorded and recorded by the company which explains the type of fertilizer, number of workers, work performance, and dosage used, for example in Prima Estate for the type of urea fertilizer there is a 2022 program of 156.90 tons and 156.90 tons have been realized and in Mahakam The estate for this type of urea fertilizer has a program in 2022 of 104.07 tons, 104.07 tons of which have been realized.

From the results of verification of the Prima Estate and Mahakam Estate fertilization realization documents, it was concluded that the fertilization realization was appropriate and the 1 year program had been completed by the company as a whole based on the fertilization recommendations set.

**Status: Comply**

**7.5 Practices minimize and control erosion and degradation of soils.**

**7.5.1 – 7.5.3**  
The company can show the soil map of PT PMM and PT TJA on the results of semi-detailed 2009 soil survey conducted by PT Earth Line at a scale of 1: 90,000 and the land suitability map of PT PMM at a scale of 1: 40,000 and PT TJA at a scale of 1: 35,000. Based on the map study, it can be concluded that there is no land with a slope > 20 °. Potential fragile land is peat (Sapric Haplohemists) of 17.79% from 15,308.36 Ha or 2,723.58 Ha in PT PMM area and 19.50% from 5,198.94 or 1,013.71 ha in PT TJA area.

**Status: Comply**

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

**7.6.1**  
The certification unit has the Evans Indonesia Semi Detailed Soil Survey Report document dated 3 June until 5 July 2009 and 24-25 November 2009 conducted by PT Earthline covering PT PMM 18,207.70 ha and PT TJA 7,290.44 ha. Documents explained and presented include land suitability map documents both physical conditions (topography and slope) and soil types.

**7.6.2**  
Based on general field observations on harvesting, spraying and fertilizer activities, it is known that the existing areas in PT PMM and PT TJA consist of peat areas (with a depth of below 3 meters) that are suitable for planting and mineral areas that are predominantly flat.

PT PMM and PT TJA have no areas of high steepness planted with oil palm and no planted areas on marginal soils. However, there

is a planting area on peat soil. The company has a management plan for the peat area. Peat area management is described in indicators 7.7.3 and 7.7.4. The plan has been implemented. It is clearer in indicators 7.7.3 and 7.7.4

**7.6.3**  
The soil type maps and topographic maps containing information on soil classification, texture, drainage, limiting factors and suitability information for the development of oil palm plantations have helped companies to manage blocks, roads, drainage, bridges, etc. The Unit of Certification also has a Road Maintenance Program that is equipped with adequate infrastructure and facilities to carry out the work. According to the results of the field visit, roads are in good condition and harvested FFB is transported smoothly to Mill.

**Status: Comply**

**7.7**  
**No new planting on peat, regardless of depth after November 15<sup>th</sup>, 2018 and all peatlands are managed responsibly.**

**7.7.1**  
Based on the results of the study of the area statement document and interviews with management, it was found that the company did not plant in peat areas after November 15, 2018. As information from the distribution of planting years, it is known that the range of planting years in the company's operational area is between 2007 and 2017. There is no additional planting after the 2017 period both in the mineral area, especially in the peat area.

**7.7.2**  
The company again sent a peat inventory report to the RSPO (ghg@rspo.org ) on Januari 27, 2021 which has explained the entire peat area in PT PMM and PT TJA including planted area, unplanted area and HCV. The total peat area is 3,737.29 Ha, of which 2,724.31 Ha planted area, 479.91 Ha unplanted and 533.06 Ha HCV.

More detailed information can be found in the table below:

<b>Summary of estates containing peat</b>	Area (Ha)
Peat of Planted Area	2,724.3
Peat of unplanted- infra, building, etc	533.08
Peat of unplanted- Other HCV,HCS,Conservation	479.91
<b>Total Area</b>	<b>3,737.28</b>

**7.7.3**  
Based on information from the review of documents for 2022 and 2023, it is known that the company has carried out water management and has installed piezometers and water level stakes to measure the groundwater level and water level in canals/ditches. For example, the measurement results are as follows:

- Monitoring subsidence for the 2022 period of Prima Estate, it is known that the subsidence of peat soil during the period of 30 June 2022 averaged a reduction of 0.4 cm of peat subsidence.
- Monitoring the Mahakam Estate water level for the 2023 period, it is known that the water level in the 07 February 2023 period was 60 cm
- Monitoring the Beringin Jaya Estate piezometer for the 2023 period, it is known that the peat groundwater level in the 07 February 2023 period was 42 cm

Based on the results of the monitoring review above, it can be concluded that (subsidence, groundwater level, high water level) are in accordance with statutory regulations.

The company shows a Peat Area Map with a scale of 1:70,000 dated 10 November 2019 regarding planting on peat land and an area statement explaining the principal amount per year of planting. Based on the results of interviews with peat area monitoring officers in the E10 Beringin Jaya Estate block, it is known that officers regularly report the water level and decrease in soil subsidence.

Based on the results of field observations in block E10 Beringin Jaya Estate, subsidence stakes are in good condition and functioning properly according to the SOP set by the company.

**7.7.4**

Based on information from the review of documents for 2022 and 2023, it is known that the company has carried out water management and has installed piezometers and water level stakes to measure the groundwater level and water level in canals/ditches. For example, the measurement results are as follows:

- Monitoring subsidence for the 2022 period of Prima Estate, it is known that the subsidence of peat soil during the period of 30 June 2022 averaged a reduction of 0.4 cm of peat subsidence.
- Monitoring the Mahakam Estate water level for the 2023 period, it is known that the water level in the 07 February 2023 period was 60 cm
- Monitoring the Beringin Jaya Estate piezometer for the 2023 period, it is known that the peat groundwater level in the 07 February 2023 period was 42 cm

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The company shows a Peat Area Map with a scale of 1:70,000 dated 10 November 2019 regarding planting on peat land and an area statement explaining the principal amount per year of planting. Based on the results of interviews with peat area monitoring officers in the E10 Beringin Jaya Estate block, it is known that officers regularly report the water level and decrease in soil subsidence.

Based on the results of field observations in block E10 Beringin Jaya Estate, subsidence stakes are in good condition and functioning properly according to the SOP set by the company.

**7.7.5**

Based on a study of the area statement document, it is known that the oldest plant is 15 years old (planting year 2007) so that at least in the next five years the unit of certification will not carry out replanting activities based on projected production of 2023 - 2027. The company also shows an e-mail address from the President Director dated 15 November 2022, which states that the replanting program can start in 2028 for nucleus estates and 2031 for plasma plantations.

Planned core plantation replanting program and Plasma 2028 – 2046 for PT PMM 926.11 Ha in year of 2028, PT TJA 0 Ha. For Plasma, the first plan will start in year of 2031, the second plan will be year of 2033, the 3rd plan will be year of 2035 and so on.

However, the company has not conducted a study on assessing the rate of drainability in the peat area, so this is an opportunity for improvement (**OFI**) for the company to conduct a drainage study on the peat area that will be replanted in accordance with the RSPO Drainability Assessment Procedure, or other methods recognized by the RSPO, (at least five years or according to the provisions in the RSPO Drainability Assessment Procedure) prior to replanting.

**7.7.6**

Estate management has adopting peat management in accordance with applicable regulation in Indonesia, such as conducting field drainage system, as well as monitoring on water level, water table and subsidence rates, as explained in Indicator 7.7.3 and 7.7.4. In line with this, based on the results of field observations in Block E10 Beringin Jaya Estate it is known that the decrease in the subsidence rate is 0.4 cm with a water level that is maintained at 60cm.

**7.7.7**

Based on the hectare statement shown by PT PMM and PT TJA, of the total area managed by the company, there are areas that are not planted with oil palm. The area consists of roads, buildings, factories, reservoirs, reserved areas, occupations and conservation areas. From the area not planted with oil palm, there is a peat area which is a conservation area and the company has managed the area to become HCV. Based on field observations of the company's HCV areas, it can be seen that the area is naturally preserved and has natural vegetation.

**Land Fire Monitoring**

The company has a trained firefighting team with the aim that if there is a land fire in the conservation area it can be dealt with immediately and regular monitoring has been carried out to prevent land fires in the conservation area.

And there is no opening of new land in the peat area at PT PMM and PT TJA.



**Status: Comply**

**7.8**

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

**7.8.1**

Based on the 2008 ANDAL, the results of the identification of HCVs 2007, 2011, 2012 and 2022, as well as maps of river flows and water sources, it can be seen that there are several points of water sources in the operational area, among others:

- PT PMM: Tebalai River, Bukit Jering tributary, Loleng River, Upper Mahakam River, Mahakam Hilir River, Kedang Semilis Hilir River, Canal 1, Canal 2, Upper Kedang Semilis River, Middle Mahakam River, Upper Keham River and Keham Hilir River.
- PT TJA: Paseban River and Mahakam River.

Based on this document, it is also known that the water source management plan is to test the quality of surface water in all the rivers every 6 months, monitoring wells every 6 months and drill wells every 1 year. All tests were carried out by a KAN accredited laboratory (LP-060-IDN). Related to this, the company shows the results of testing the quality of surface water for the period of semester 2 of 2022 which was carried out on December 23, 2022.

The company carried out surface water tests with 26 indicators carried out at all of the sample points mentioned above. Based on the analysis of the test results for all these locations, it shows that there are test results parameters that are not in accordance with the applicable quality standards, namely the East Kalimantan Provincial Regulation Number 02 of 2011 class 2. Parameters that are not in accordance with the average quality standards are ph, COD and DO. This is because the value originating from the upstream of the river is not in accordance with the quality standard. Based on the analysis of the Landsat map, it can be seen that the upstream part of the river has been dominated by oil palm plantations and community settlements. In addition, the type of river that flows in the company's area is a river originating from peat swamps, so the water quality is already low. The company's location is also in a coastal area that is heavily affected by the tidal activity of a large river (the Mahakam River), making it difficult to control water quality.

The unit of certification also does not limit access to clean water, and all workers also have access to adequate clean water. Based on the results of field observations in the housing area of 6 Estate as well as interviews with workers, information was obtained that clean water facilities for housing were obtained from drilled wells and Reverse Osmosis (RO). Drinking water testing is also carried out by the company to see the quality of drinking water taken from drilled wells carried out by a KAN accredited laboratory (LP-060-IDN) on December 23, 2022. The results of testing the quality of drinking water also show that all parameters of the test results are still in accordance with the standards. The applicable quality is the Regulation of the Minister of Health Number 492 of 2010. Meanwhile, the results of the monitoring well test will be explained in indicator 7.8.3.

The company also has a river border management plan which is described in the SOP for Water and Soil Conservation number AGR-SOP05-01 and the SOP for Management and Monitoring of HCV number SUS-SOP01-01 dated October 1, 2019. For those with river and tributary status, follow the rules, namely the width of the border. river 50 meters to each side of the river. Based on the results of document verification and field observations to several sampling locations, it shows that the company has carried out activities in an effort to improve water quality, including:

- Management of river borders and water sources in the form of reservoirs and canals.
- Waste water management using WWTP and its utilization in licensed application areas as well as monitoring the quality of wastewater and monitoring wells.
- Monitoring of water use for palm oil processing and evaluation of its use.
- Planting of plant species on river borders such as Bamboo, Gelam, and Verifier Grass.

**7.8.2**

The company has procedures related to identification, management and maintenance of water sources and quality which are listed in the SOP for Water and Soil Conservation number AGR-SOP05-01 and SOP for Management and Monitoring of HCV number SUS-SOP01-01 dated October 1, 2019. The SOP describes several matters related to the management of river borders and other water sources, for example in order to protect water resources, determining the width of river borders following Presidential Decree No. 32 of 1990, carrying out border protection, conducting outreach to all parties involved in plantation operational activities to participate in carrying out water protection activities, making boundary markings, as well as monitoring water resources. The company also has an identification of a surface water flow map in the form of a map with a scale of 1: 110,000 which includes the scope of certification, namely PT PMM and PT TJA. All river boundaries within the company's scope are designated as conservation areas.

In addition, the company also explained the efforts to manage river borders and other water sources that have been carried out such as periodically monitoring the condition of river borders from potential pollution and fires every month, testing surface water quality standards to ensure river water quality is still within normal limits every semester, as well as marking the boundary of the chemical application area in red. In addition, the company also conducts socialization to employees and the surrounding community in conservation efforts which can be proven based on the minutes of socialization to workers on July 18 2022 (Beringin Jaya Estate) and November 2, 2022 Bumi Permai Estate and to the local community on 12 December 2022 based on the 2022 HCV Management Plan document. Interviews with spraying and fertilizing workers in all sample locations also stated that they were aware of the rules regarding chemical application limits, prohibition of washing chemically contaminated goods in rivers and other activities that have a negative impact on water sources. Based on the results of a field visit to the Riparian Paseban River Block O50 & O51 Mahakam estate no evidence replanting on riparian, the water courses and wetlands has been protected in accordance with the RSPO Manual on BMPs for the management and rehabilitation of riparian reserves.

Based on the results of a field visit to the blok I25/J25 Permai Estate riparian and there are indications of traces of the application of chemical pesticides and fertilizers in the water stream and there are no signs of conservation area boundaries on the riverbank, this has become a non-compliance number 2023.01 with major category on indicator 7.12.4.

### 7.8.3

The unit of certification has facilities for the management of POME produced from both factories (BPM and RHM) using WWTP. POME that has been managed at WWTP will then be used as a fertilizer substitution in Land Application (LA). Before being distributed to the Land Application, all POME is entered into the WWTP with a single-feeding system which is then processed to reduce pollutant elements so that it is suitable for application to land. Waste treatment facilities owned by each factory include:

- Bumi Permai Mill: 1 cooling pond, 2 methane capture ponds, 1 reservoir for composting, 1 anaerobic pond, and 1 final pond, the outlet is in the final pond.
- Rahayu Mill: 1 Cooling Pond, 1 methane capture pond, 1 reservoir for composting, 2 anaerobic ponds, and 1 final pond, the outlet is in the final pond.

All liquid waste produced by the factory is reused to produce electrical energy through methane capture (biogas plan), after going through the methane capture process, the waste is reused for the EFB composting process so that it does not require many ponds to achieve the ideal value applied to the land.

The company also has a Permit to Utilize Palm Oil Industrial Wastewater on Soil in Oil Palm Plantations, including:

- PT PMM: Permit for Utilization of Palm Oil Industry Wastewater on Soil for Bumi Permai Mill based on the decision of the Regent of Kutai Kartanegara Number 660.1/002/B.II.1/SK-LA/BLHD/III/2014 dated March 7, 2014 with a land area of allowed for an application area of 200 Ha. The permit does not include the expiration date of the permit, regarding this, the Department explained that the permit will remain valid until there is a violation or a change in the application area. For now, there have been no violations and changes so there is no need to update.
- PT TJA: Operational Feasibility Letter for Wastewater Utilization System for Rahayu Mill based on the decision of the Environment and Forestry Office of Kutai Kartanegara Regency Number P-0723/DLHK/BID.III.2/660.31/10/2021 dated 11 October 2021 with a land area of allowed for an application area of 200 Ha. The document refers to the technical approval given by the Office with document number P-0655/DLHK/BID-III-2/660.31/09/2021 dated September 21, 2021.

The permit also includes an obligation to monitor groundwater quality using monitoring wells at 3 locations respectively. There is an obligation in the permit document, namely to monitor potential environmental impacts at any time and ensure the quality of POME that will be applied to the land is in accordance with applicable quality standards. The company can show the results of the recapitulation of the POME application to the Land Application, for example at the Bumi Permai Mill, which is a total of 159,743 m<sup>3</sup> for the period 2022, or the equivalent of 440 m<sup>3</sup>/day.

To determine the feasibility of POME quality, the company conducts monthly testing using quality standards that refer to the Ministry of Environment Decree No. 28 of 2003 concerning Technical Guidelines for Assessment of Wastewater Utilization in Palm Oil Plantations. The company can show evidence regarding the results of POME quality measurements in the form of test results documents carried out by a laboratory accredited by KAN (LP-258-IDN). Based on the results of the analysis of the test results for the period January 2022 until February 2023, it shows that all parameters are in accordance with the applicable quality standards. This shows that the POME generated from FFB management activities is feasible to be applied to Land Applications. The company

can also show the results of testing on monitoring wells for the period of semester 2 of 2022 carried out by a KAN accredited laboratory (LP-060-IDN) on December 23, 2022. namely Regulation of the Minister of Health No. 32 of 2017. Based on this, the OFI on surveillance 1.1 has been fulfilled.

In addition, the company also has procedures related to liquid waste management based on the Palm Oil Mill Liquid Waste Application SOP number AGR-SOP15-01 dated March 3, 2020 which explains all Palm Oil Effluent (POME) application activities and their management related to environmental, social, work safety aspects. and in accordance with technical instructions. The company has also reported the results of liquid waste management which is incorporated in the Land Application Management Report every 3 months and in the RKL-RPL report every 6 months to the relevant agencies. The Land Application Management report for the 4th quarter of 2022 has been reported on February 4, 2023 to the Environmental Service of Kutai Kartanegara Regency.

**7.8.4**

The company already has a Surface Water Utilization Permit, including:

- PT PMM: Surface Water Utilization Permit based on the Decree of the Minister of Public Works and Public Housing Number 447/KPTS/M/2020 dated 6 May 2020 which is valid for 5 years. The water intake point is located on the Semilis River with a maximum discharge of 51,300 m<sup>3</sup>/month.
- PT TJA: Surface Water Utilization Permit based on the Decree of the Minister of Public Works and Public Housing Number 54/KPTS/M/2017 dated January 31, 2017 which is valid for 5 years. The water intake point is located on the Mahakam River with a maximum discharge of 1,140 m<sup>3</sup>/month. The permit has passed the expiration date and has been explained on indicator 2.1.1.

The company also has a water use procedure regulated in the SOP Water Management Plan Number PMM/SOP/General-31 which is effective January 1, 2015. The company can also show documents for recording daily water use, as well as the results of recapitulation of water use for palm oil processing units every day and recatulation on month. For example for the period January - December 2022 for each POM namely:

- Based on surface water utilization data at Bumi Permai Mill, if the average water use per ton of processed FFB is taken at 0.57 / ton of processed FFB, this shows that the company is still using water according to the permissible and buged quota set by the company for 2022 of 0.60 / ton of processed FFB.
- Based on surface water utilization data at Rahayu Mill, if the average water use per ton of processed FFB is 0.53 / ton of processed FFB, this shows that the company is still using water according to the permissible and buged quota set by the company for in 2022 of 0.55 / ton of processed FFB.

The company can also show proof of payment of the water levy to the Regional Revenue Service Technical Implementation Unit (UPTPPD) for the period January until December 2022 with the payment period being made every month. The last example of proof of payment of water levies is based on proof of payment made on February 10, 2023 for total water use in December 2022, the water tax paid is not only for the FFB processing process but for all water uses. While the surface water utilization tax for Rahayu Mill is paid on March 10, 2023.

The results of field observations in the Water Treatment Plan (WTP) and Water Intake also show that the flowmeter used is still functioning properly. The results of interviews with officers responsible for WTPs also show that operators are very understanding about how WTPs work and recording flowmeter data. Officers can also show data in and out of water which is recorded every day.

**Status: Comply**

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

**7.9.1**

The Certification Unit has made efforts to improve the efficiency of the use of fossil fuels and optimize renewable energy, these efforts are also monitored and documented in the form of a recapitulation document on the use of Biogas and Biofuels at the Bumi Permai Mill and Rahayu Mill for the period 2022. Biogas is energy produced from the methane process. capture in WWTP, while Biofuel is solid waste in the form of shells and fiber which is used to substitute fossil fuels (diesel) as a producer of electrical energy using a boiler. The recapitulation of solid waste utilization at Bumi Permai Mill for the period January – December 2022 most of which are used for the combustion process in boilers or equivalent to **20%** of the total Processed FFB.

Based on data analysis on the use of diesel fuel for FFB processing, information on the estimation of diesel fuel needed to generate

electricity in the factory area is 2,336,798 liters/year or 8.20 liters/ton of FFB. However, due to the efficient use of diesel fuel which is substituted with Biogas and Biofuel, it can reduce the use of diesel to only 9,411 liters/year or equivalent to 0.03 liters/ton of FFB. This shows that the use of Biofuel can reduce the use of diesel fuel by 99.99% for 2022. The low use of diesel is because almost all of the electricity needed for processing FFB has used electricity supply from the Biofuel and Biogas Plan.

The results of interviews with the company stated that this efficiency is very beneficial because it can reduce diesel consumption. Currently it is needed only to turn on the generator as the initial power plant. Energy efficiency is also applied to all of the company's operational activities by minimizing the use of fuel by contract workers, including all machinery and transportation operations. The total utilization of diesel for 2022 is 120,200 liters.

In addition, the company also sells shells and electrical energy produced from the Biogas Plan. For the period of 2022, Bumi Permai Mill sells shells of 2,482 tons, and can generate electricity from the Biogas Plan of 13,711,320 Kwh. This value is very large when compared to the energy requirement for the FFB processing process which is only 45% of the energy produced by the Biogas Plan. Thus, the unused energy is then sold to the State-Owned Electricity Company. Based on this, the company has made efficient use of fossil fuels very significantly and can optimize all waste generated from the FFB processing process into renewable energy sources.

**Status: Comply**

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

**7.10.1**

The Certification Unit has carried out an inventory of GHGs contained in the Greenhouse Gas Emissions Mitigation Program document for the 2021 period, based on document analysis, it can be concluded that the company has identified the source of GHG produced by the Bumi Permai Mill and Rahayu Mill units and all of their suppliers' sources. Identification of significant sources of GHG emissions are identified and mitigation plans have been developed by the company covering mills and plantations. Significant GHG emissions include land use change, POME processing, use of fertilizers and pesticides, use of fossil fuels for operations and transportation. The mitigation plans include, among other things, the correct dosage and application of fertilizers as recommended, reducing reuse and recycling, limiting the use of electricity, transportation and machine maintenance, as well as periodic air quality tests. The company has also reported the results of the GHG calculation to the public which was submitted to the RSPO GHG website.

Reduction of fossil fuels at Bumi Permai Mill and Rahayu Mill has been carried out by using fiber, shells and biogas for fuel substitution. The company also uses POME to be applied to land with test results from the monitoring period January – December 2022 which show that all wastewater testing parameters have met the applicable quality standards. Based on the review of documents for example: monitoring of pesticide use, monitoring of diesel fuel, identification of HCVs and others it 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 2022 for Bumi Permai Mill (BPM) and Rahayu Mill (RHM) is as follows:

**Bumi Permai POM**

<b>Emissions per product</b>	<b>tCO2e/tProduct</b>
CPO	1.73
PK	1.73

<b>Production</b>	<b>t/yr</b>
FFB processed	304,132.48
CPO produced	70835
PK produced	15555

<b>Extraction</b>	<b>%</b>
OER	23.29
KER	5.11

<b>Land use</b>	<b>Ha</b>
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Planted area on mineral	12438.49
Planted on peat	2711.5
Total area planted	15149.99
Conservation Area (Forested)	0
Conservation Area (Non-Forested)	2328.45
FFB Production per hectare	21.24

**Summary of field emission and Sinks**

Description	Own crop		Group		3rd	Total
	tCO2e	tCO2e/tFFB	tCO2e	tCO2e/tFFB	tCO2e	
<b>Emissions Sources</b>						
Land conversion	80153.89	0.34	21202.59	0.37	0	101356.5
CO2 emissions from fertilizer	5409.70	0.02	1467.89	0.03	0	6877.58
NO2 emissions from peat	14700.33	0.06	4063.34	0.07	0	18763.67
N0O2 from Fertilizer	5125.38	0.02	1439.57	0.02	0	6564.95
Fuel consumption	1419.56	0.01	772.63	0.01	0	2192.18
Peat oxidation	107222.02	0.46	29637.38	0.51	0	136859.4
<b>Sinks</b>						
Crop sequestration	-105423.93	-0.45	-27887.12	-0.48	0	-133311
Sequestration in Conservation area	-1317.91	-0.01	-4931.35	-0.09	0	-6249.26
<b>Total</b>	<b>107289.02</b>	<b>0.46</b>	<b>25764.94</b>	<b>0.45</b>	<b>19373.37</b>	<b>152427.33</b>

**Summary Oil Mill Emissions and Credits**

Remarks	tCO2e	tCO2e/t FFB
<b>Emissions sources</b>		
POME	6999.42	0.02
Fuel consumption	464.81	0
Grid electricity	0	0
<b>Credits</b>		
Export of grid electricity	-10223.7	-0.03
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>-2759.47</b>	<b>-0.01</b>

**Palm Oil Mill Effluent (POME) Treatment**

Divert to compost (%)	0
Divert to anaerobic digestion (%)	100

**POME Divert to Anaerobic Digestion**

Divert to anaerobic pond (%)	0
Divert to methane capture (flaring) (%)	0
Divert to methane capture (electricity generation) (%)	100

N	Supplier Name	FFB Production by	FFB Supplied by	Percentage of	FFB
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o	Estate/Plantation (t)	Estate/Plantation (t)	supplied Estate/Plantation (%)	by
1	Mahakam Estate	20763.91	18823.7	90.66
2	Rahayu Estate	54282.31	38884.34	71.63
3	PT Kutai Agro Jaya	11396.1	11396.1	100
4	Prima Estate	57797.72	57726.87	99.88
5	Beringin Jaya Estate	29861.1	29790.59	99.76
6	Bumi Permai Estate	40405.29	40350.84	99.87
7	Kahoi Estate	50042.3	49978.62	99.87
8	Lembuswana Estate	47682.14	47614.56	99.86
9	Koperasi Maju Membangun	2034.12	2034.12	100
10	Koperasi Sawit Etam Bersama	4032.45	4032.45	100
11	Koperasi Tanah Sama	3500.29	3500.29	100

**Rahayu POM**

Emissions per product	tCO2e/tProduct
CPO	6.30
PK	6.30

Production	t/yr
FFB processed	197,899.81
CPO produced	41984.14
PK produced	8273.27

Extraction	%
OER	21.21
KER	4.18

Land use	Ha
Planted area on mineral	11775.44
Planted on peat	2711.50
Total area planted	14486.94
Conservation Area (Forested)	2328.45
Conservation Area (Non-Forested)	0
FFB Production per hectarage	33.21

**Summary of field emission and Sinks**

Description	Own crop		Group		3rd	Total
	tCO2e	tCO2e/tFFB	tCO2e	tCO2e/tFFB	tCO2e	
Land conversion	6298.02	0.36	110.64	0.01	0	6408.66
CO2 emissions from fertilizer	9.81	0	7.43	0	0	17.24
NO2 emissions from peat	1511.46	0.09	23.86	0	0	1535.32
N0O2 from Fertilizer	7.61	0	7.19	0	0	14.80
Fuel consumption	164.01	0.01	2.76	0	0	166.77

Peat oxidation	11024.33	0.64	174.06	0.02	0	11198.39
Sinks						
Crop sequestration	-8270.05	-0.48	-145.52	-0.01	0	-8415.57
Sequestration in Conservation area	-817.70	-0.05	-23.98	0	0	-841.68
<b>Total</b>	<b>9927.48</b>	<b>0.57</b>	<b>156.46</b>	<b>0.01</b>	<b>306398.75</b>	<b>316482</b>

**Summary Oil Mill Emissions and Credits**

Remarks	tCO <sub>2</sub> e	tCO <sub>2</sub> e/t FFB
<b>Emissions sources</b>		
POME	0	0
Fuel consumption	195.90	0
Grid electricity		
<b>Credits</b>		
Export of grid electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>195.90</b>	<b>0</b>

**Palm Oil Mill Effluent (POME) Treatment**

Divert to compost (%)	0
Divert to anaerobic digestion (%)	100

**POME Divert to Anaerobic Digestion**

Divert to anaerobic pond (%)	0
Divert to methane capture (flaring) (%)	100
Divert to methane capture (electricity generation) (%)	0

No	Supplier Name	FFB Production by Estate/Plantation (t)	FFB Supplied by Estate/Plantation (t)	Percentage of FFB supplied by Estate/Plantation (%)
1	Beringin Jaya Estate	29861.1	70.51	0.24
2	Kahoi Estate	50042.68	63.68	0.13
3	Lembuswana Estate	47682.14	67.58	0.14
4	Prima Estate	57797.72	70.85	0.12
5	Mahakam Estate	20763.91	1940.21	9.34
6	Rahayu Estate	54282.31	15397.97	28.37
7	PT. Budi Duta Agromakmur	1529.88	1529.88	100
8	PT. Delta Utama Resources	225.43	225.43	100
9	PT. Arus Cipta Eriady	4474.02	4474.02	100
10	PT Wong Akeh Utama	75506.73	75506.73	100
11	Bahrudin	1319.14	1319.14	100
12	Rony Wijayanto	16220.73	16220.73	100
13	Intan Jaya, CV	334.54	334.54	100

14	Bumi Gatah Permai, CV	6709.22	6709.22	100
15	PT. Anugrah Jasha Investama	22376.26	22376.26	100
16	PT. Agro Bumi Kaltim	2745.87	2745.87	100
17	Aliansyah A	43259.11	43259.11	100
18	PT. Imaira Harapan Sejahtera	4134.22	4134.22	100
19	CV Berkah Hizriah	1161.21	1161.21	100
20	PT. Tunas Prima Sejahtera	238.2	238.2	100
21	Bumi Permai Estate	40405.29	54.45	0.13

Based on the results of the above data analysis, it can be seen that the emission value from the production of CPO and PK for Bumi Permai Mill (BPM) is quite low at 1.73 tCO<sub>2</sub>/tProduct. Likewise, when compared with the emission values of the previous period, it shows that there is a decrease in CPO and PK emissions from 1.99 tCO<sub>2</sub>/tProduct to 1.73 tCO<sub>2</sub>/tProduct. Meanwhile the HCV area total still accordance with the last HCV identification.

**7.10.2**

The company did not carry out new developments after 2014, but the company continues to manage GHG by conducting an inventory of emission sources. They can show identification documents of activities that generate emissions for the period 2022 for Mills and Plantations. This is done to estimate carbon stocks in the management area along with potential sources of emissions that can occur directly as a result of the management, and a plan to minimize these emissions is drawn up and implemented.

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, utilizing methane gas produced from POME management using the Biogas Plan, performing 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 dose, routine maintenance of operational vehicles, socialization of the prohibition of burning waste, implementation of efficient use of electricity and integrated pest control to minimize the use of pesticides.

**7.10.3**

For existing operation, the company has identified pollutions and emissions sources of Bumi Permai and Rahayu POM for period 2022, such as CO<sub>2</sub> (boiler, generator, transportation), CH<sub>4</sub> (POME), hazardous waste (WTP, chemical storage), noise (machinery). The sources of pollution and emissions for estate are listed on the identification documents and management plans for pollution sources for the period 2022, such as: emissions (CO<sub>2</sub>, CO), noise, chemical waste, organic and inorganic waste and infectious waste. Plans to reduce or minimize has been implemented and monitored as explained on RKL-RPL semester 2-year 2022.

Fossil fuel reducing on Bumi Permai and Rahayu POM have been implemented by fiber/shell usage for boiler. POME has been monitored every months and monitoring periods January 2022 until February 2023, shown that all of POME testing parameters is compliant to the standards quality.

**Status: Comply**

**7.11  
Fire is not used for preparing land and is prevented in the managed area.**

**7.11.1; 7.11.2**

The company has land clearing procedures (PMM / SOP / AGRO-02). This procedure explains that clearing land without using fire, cutting (stumps/falls), leaving on a certain path (piling up) and using heavy equipment for mechanical stacking.

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

- Monitor fire facilities and infrastructure owned every month. For example, for the period of December 2022 it is known that there is no fire case in the company's work area
- Have a map of fire-prone areas with a scale of 1: 38,000.
- Has an emergency response team structure that has been trained to deal with fires
- Conduct training simulations on a regular basis
- Monitoring and control of land fires for the second semester of 2022 was submitted to the Plantation Office of Kutai Kartanegara Regency on January 2023



The company can show a list of emergency response preparedness equipment along with a recording of its condition monitoring which is carried out every month, as for the list of emergency preparedness equipment owned by the company as of December 2022

- Water tank
- Water pump
- Hose
- Nozzle
- Light fire extinguisher
- Hydrants
- Portable pump
- Peat injection
- First Aid
- etc.

The results of an interview with communities around, known that there is no history of fires in the company area within the last 2 years.

**7.11.3**

The company can show recordings of periodic training, for example the Minutes of Socialization Emergency Response Simulations which were carried out on September 28, 2022 which involved local stakeholders such as Lebak Mantan village, Loleng Village etc.

Based on the results of field observations in the operational activities, it shows that there is no operational activities that use fire. Based on interviews with management and external stakeholder, it was stated that all land clearing activities were mechanical. Based on an interview with village representatives known that company has shown a commitment not to burn for land clearing through fire simulation activities involving various stakeholders.

**Status: Comply**

**7.12  
Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.**

**7.12.1 and 7.12.8**

Based on management information and a review of the area statement, the following information was obtained:

- The company has carried out land clearing above November 2005, namely in 2007 – 2012, but the land clearing activity was carried out after an environmental and social assessment carried out by Environmental Consultants (Charlie Ross) in April 2007 with results showing that the areas in PT PMM and PT TJA is not primary forest.
- For the 2014 – 2017 period, planting activities are new planting activities carried out in areas that are still within the scope of the company's Location Permit, which also falls within the scope of the 2007, 2011 and 2012 HCV assessments. In addition, the company has also conducted a New Planting Procedures (NPP) in February 2013, so that the new planting area is suitable for land clearing according to RSPO standards.
- Meanwhile, planting activities in 2018-2021 are replanting activities in oil palm plantation areas that have been damaged due to flooding. This is evidenced by field visits to the replanting area of block S41 Bumi Permai Estate, and block I28 Prima Estate, as well as analysis of satellite imagery by comparing these locations based on the time series from 2015 – 2020.

Based on this information, it can be concluded that the LUCA and RaCP procedures do not apply to PT PMM and TJA. The company can also show the Disclosure of Zero Liability document which was sent to the RSPO on 23 July 2014, in the document stating that the PT PMM and PT TJA units have no obligation to carry out remediation and compensation. This was also confirmed based on an email from the RSPO on April 14, 2017 which stated that PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi had no non-compliant land clearance.

**7.12.2**

Based on the verification of land clearing data, there is no indication of new land clearing after 15 November 2018, therefore the company has no obligation to conduct a High Carbon Stock (HCS) study. All managed areas have been assessed for HCV which are

divided into several study documents, including:

#### **Environmental Consultants (Charlie Ross) (2007)**

The company has conducted environmental and social studies prior to land clearing by Environmental Consultants (Charlie Ross) in February - March 2007, with the final document in April 2007. The study was conducted using the 2003 HCV toolkit which aims to provide a framework of reference for environmental, social, health management. and safety, as required by the RSPO P&C, 2005. Based on this document, the company does not have a RaCP obligation because the entire scope of the company's management area has been prioritized with an HCV assessment. The scope of the study is based on the Location Permit which is divided into 2, including:

- PT Prima Mitrajaya Mandiri (PMM) which is located in 2 locations with a total area of 20,000 ha.
- PT Teguh Jayaprima Abadi (TJA) which is located in 3 locations with a total area of 17,400 ha.

Based on the results of the study, information was obtained that PT PMM and PT TJA do not have Primary Forest, but there are areas with High Conservation Value, namely Riparian Forest and Swamp Forest near the Mahakam River. Therefore, the company is recommended to set aside about 10% of the concession area for conservation, which will protect the Swamp Forest area and other representative vegetation types. The results of the study did not specify the location and extent of the HCV in question, and of the total 37,400 Ha area of Location Permits obtained, not all of them could be managed by the company. Based on this, the company again conducted more specific HCV assessments in 2011 and 2012.

#### **Envirologic Consulting (Sanath Kumaran) (2011)**

The company again conducted an HCV assessment for PT PMM conducted by Envirologic Consulting in August 2011 with the final document in November 2011 using the 2008 HCV toolkit which is divided into 2 separate documents, including:

- HCV assessment for Benua Puhun Estate or currently divided into Bumi Palma Estate (BPE) and Prima Estate (PME) with a study area of **2,905 Ha**. Based on the results of the study, the HCV area was **389.73 Ha** or equivalent to 13% of the study area.
- HCV assessment for Loleng Estate or currently Lembuswana Estate (LLE) and Prima Estate (PME) with a study area of **3,004 Ha**. Based on the results of the study, an HCV area of **352.1 Ha** was obtained, equivalent to 12% of the study area.

Based on the results of the study, information was obtained that PT PMM and PT TJA, especially for BPE and LLE, have an area with High Conservation Value with a total area of **741.83 Ha**. The results of the study were not carried out in the entire scope of PT PMM and TJA, therefore, the company again conducted another HCV assessment in 2012.

#### **Aksenta (Resit Sozer) (2012)**

The company again conducted an HCV assessment for PT PMM and TJA conducted by Aksenta in June 2012 with the final document in August 2012 using the 2008 HCV toolkit which is divided into 2 separate documents, including:

- HCV studies for PT PMM include Kaman Hilir Estate (KHE) or currently Kahoi Estate (KHE) and Bukit Jering Estate (BJE), which is currently Beringin Jaya Estate (BJE) and Muara Wis Estate (MWE) which is currently This unit is merged into the Beringin Jaya Estate (BJE)-Rose division with a scope of study covering an area of 5,084.82 Ha. Based on the results of the study, the HCV area was **668.73 Ha** or equivalent to 13.2% of the study area.
- HCV studies for PT TJA include Rantau Hemplang Estate (RHE) or currently Rahayu Estate (RHE) and Mahakam Estate (MHE) with a study area of **4792.8 Ha**. Based on the results of the study, an HCV area of **440.53 Ha** was obtained, equivalent to 9.19% of the study area.

The company conducted a public consultation on HCV on June 22, 2012 which was attended by 38 participants who were company representatives. Based on the results of the study, information was obtained that PT PMM and PT TJA apart from BPE and LLE have an area with High Conservation Value with a total area of **1109.26 Ha**. Based on the data from the 2011 and 2012 HCV assessments, it can be concluded that PT PMM and PT TJA have a total HCV area of **1851.09 Ha** or equal to 11.73% of the total study area of **15,787 Ha**. This area does not include the Plasma area of **4790.66 Ha**, the company has also identified the HCV area for Plasma conducted by the Bogor Agricultural University (IPB) in 2019, with the result that no HCV area was found in the Plasma Scope.

#### **Malaysian Environmental Consultants (Tunku Muhammad Nazim Yaacob) (2022)**

Until the remote Surveillance 1.2 audit, the company still refers to the results of the HCV identification in 2011 and 2012 which is **1,851.09 Ha**. Due to the condition of the concession area that has undergone changes such as a change in the name of the estate, changes in the conservation value of the flooded area, and too many references to HCV documents, the company will conduct another

HCV assessment in 2021. The study was conducted by Malaysian Environmental Consultants (MEC) in January - April 2021 with Final document entitled High Conservation Value Report – Upgraded Version dated January 24, 2022. The study was led by Tunku Muhammad Nazim Yaacob who is a member of the Assessor Licensing Scheme (ALS). The definitions used in this HCV assessment are based on the general definitions described in the HCVRN ‘General Guide to the Identification of High Conservation Values’ (October 2013, and updated September 2017). The results of the HCV assessment have also been carried out for a public consultation on December 6, 2021.

The scope of the study is the entire PT PMM Own Estate and Plasma (5 Estates and 6 Plasmas) covering an area of **15,240.03 Ha** and PT TJA (2 Estates and 2 Plasmas) covering an area of **5,139.23 Ha** or with a total of both areas covering an area of **20,379.26 Ha**. Although the total area of PT PMM is **16,449.50 Ha**, the scope of the assessment is only **15,240.03 Ha**. This is because an area of **1,209.47 Ha** was excluded from the scope of this assessment because the area was reviewed and approved by the HCVRN in 2019. Data on the area of the HCV area according to the results of the 2022 study are as follows:

HCV Type	HCV Area (Ha) PT PMM	HCV Area (Ha) PT TJA	Total (Ha)	Percentage
HCV 1 and 3	590.24	122.23	712.47	3.50%
HCV 1, 3 and 4	-	91.18	91.18	0.45%
HCV 1, 3, 4 and 5	208.49	34.52	243.01	1.19%
HCV 1, 3, and 5	105.17	41.91	147.08	0.72%
HCV 3 and 4	105.41	215.78	321.18	1.58%
HCV 3, 4 and 5	728.69	97.61	826.3	4.05%
HCV 4 and 5	74.17	22.29	96.47	0.47%
HCV 5	1.07	-	1.07	0.01%
Planted area	97.11	36.05	133.16	0.65%
<b>Total HCV area</b>	<b>1,910.35</b>	<b>661.57</b>	<b>2571.92</b>	<b>12.62%</b>
<b>Scope of Identification</b>	<b>15,240.03</b>	<b>5,139.23</b>	<b>20,379.26</b>	<b>100%</b>

The data above shows information on the HCV area, which is **2,571.92 Ha** (12.62% of the total area of the assessment). Apart from HCVs 1 to 5, there are also HCV 6 in the form of Cemetery and Bangeris Trees, but they are not included in the HCV area because they are represented as location points only. Based on the data above, it shows that there are differences in the area of the HCV area with the statement area of **237.82 Ha**. This is because in the area statement data, the HCV area of **237.82 Ha** is identified as an occupation area. Most of the HCV areas are old secondary forest and peat swamp forest, while some are areas that have continued to be planted with oil palm on riverbanks and low-lying areas that are inundated.

Based on all the explanations above and the results of interviews with management, it can be concluded that for surveillance 1.3, the management of the HCV area carried out by the company has referred to the HCV area data according to the results of the 2022 study, which is 2,571.92 Ha. In addition to the HCV area mentioned above, the company also has a non-HCV conservation area of 596.40 Ha where currently the condition is in the form of secondary forest around the employee housing area which is reserved for development. The verification results also show that there is a significant increase in the area of the HCV area from the results of the previous study with several new areas being included in the scope of the HCV. Base on document review, the management of the new areas has been carried out accordance of the document on the results of the 2022 HCV assessment was only carried out in 2022, the management program for the new areas has been implemented by involved relevant stakeholders either directly or indirectly for the HCV area year 2022. Thus, **OFI** in last year's assessment has been followed up by CH on ASA 1.4.

**7.12.3**

Base on document submitted by Proforest namely RSPO No deforestation consultancy: high forest cover countries, Consultancy report on definitions and recommendations to the RSPO June 2018 as known not set HFCL for Indonesia.

**7.12.4**

The company already has an HCV management plan that is listed in the Management and Monitoring Plan of HCV for the period 2021 – 2023. The management plan was prepared based on the results of a management plan review for the previous period which was carried out in a participatory manner involving the surrounding community and employees and reported to BKSDA Kalimantan Timur Province dated 28 February 2023. The HCV management and monitoring plan includes:

- Installation of HCV signboards

- Create a flow chart of the mechanism of protected animals
- Mapping transects plots/lines
- Socialization of HCV and the environment to the community (external)
- Greening
- Animal mitigation training
- HCV Patrol
- Mitigation of animal conflicts
- Vegetation analysis

The companies can show records of HCV management carried out in the period year 2022, for example:

- Socialization of HCV and the environment to the community.
- Training on animal inventory and monitoring conducted in 15 November 2022 for staff and employees.
- Reforestation of conservation areas in and 19 July 2022 in Block K31-32 and block O44-45 (PT PMM) and Block I50 & J48 (PT TJA).
- HCV sign board maintenance carried out on July until December 2022.
- Animal conflict mitigation training on 19 December 2022 for all staff and employees.
- Animal monitoring was carried out on January until December 2022 on all estate (PT PMM & PT TJA). The results of animal monitoring revealed that there are protected animals in accordance with LHK Ministerial Regulation NO 106 of 2018, namely the *Bornean Orangutan (Pongo Pygmaeus)*, *Proboscis monkey (Nasalis larvatus)*, *Black Hornbill (Anthracoceros malayanus)*, *Rhinoceros Hornbill (Buceros rhinoceros)*, *Red Langur (Presbytis rubicunda)*, *Silvery Lutung (Trachypithecus crista)* and many other protected species. The results of interviews with employees also stated that the *Root Tiger (Prionailurus bengalensis)* and *Stork (Ciconia episcopus)* species were often found around the HCV area.
- Identification of threats and sources of threats to the presence of HCVs carried out in January until September 2022. From the results of the report during the activities, there were no threats such as hunting, illegal logging, animal traps and forest fires in the HCV area.

Regarding the HCV area management and protection plan, it is contained in several documents, namely:

- PT PMM & PT TJA January 2022 HCV review document describes the HCV management plan with:
  - Making boundary signs in oil palm planted areas and non-oil palm planted areas and installing HCV signboards
  - Suppress harmful activities in the area such as prohibition on hunting, burning, cutting down trees and using chemicals, especially in riparian areas.
  - Perform maintenance activities manually without chemicals
- SOP document Number SUS SOP01-01 dated 1 October 2012 for riparian buffer management which explains:
  - Small river < 10 meters HCV area 50 meters to the left and right of the river.
  - Small river > 10 meters HCV area 100 meters to the left and right of the river.
  - Point 3.3.4 for oil palm trees is marked with an X, no need for fertilization and chemical treatment, wood shoots and shrubs are allowed to grow naturally.
- The company shows PT PPM & TJA's 2022-2023 HCV management and monitoring plan document which explains that HCV patrols are carried out every month to check that there are no spraying of herbicides, pesticides 50 m from the riparian, only manual maintenance activities are permitted and maintenance of warning signs/notifications conservation area is conducted every month.

As the implementation of these procedures during the audit process, evidence of the implementation of the plan can be shown, including:

- PT PPM & PT TJA's HCV review document from April 2022 to April 2023 describes the realization of river bank management, maintenance of HCV boundary signs and HCV signs, the last realization in June 2022.
- The HCV patrols for the period April 2022 to April 2023 explained that the company has been monitoring HCV areas and the results are that the HCV areas are still maintained.

However, based on the results of field visits in the Block I25/J25 Prima Estate Block I25/J25 riparian HCV area, it is known that there are no signs of a conservation area boundary on the riparian. In that area, open fertilization activities with the type Manuring Sulfur

were also found and traces of pesticide spraying were also found in the river border area. This was also confirmed by the results of verification of the Foreman Work Form (FKM) documents for pesticide and fertilizer applications, also explaining that pesticide applications (spraying circle paths) had been carried out in block I25 on 5 December 2022 and manuring sulfur in block I25 on 1 April 2022.

The company has not been able to show evidence of the implementation of the water resources HCV management plan in accordance with the HCV Management plan and SOP they have. **This indicator become non conformity number 2023.01 with major category.**

#### 7.12.5

The company has identified the needs of the community as well as the areas needed by the affected community to meet their basic needs, taking into account the potential positive and negative changes in their livelihoods as a result of the company's operational activities. This can be proven by the presence of an HCV area in the Plasma scope. The company has identified and carried out activities to minimize risks and impacts both for the community and for the environment, for example by providing regular socialization to the community not to apply chemicals in river border areas to avoid pollution, not to clear land by burning, and so on. etc.

The company has also considered various land tenure and management options to protect HCV areas in a way that also protects the rights and livelihoods of local communities. Since the area managed by the company is directly adjacent to the settlement, the level of potential conflict between the HCV area and the community is quite high. However, the company can overcome this with outreach activities and approaches with communities based on Plasma development. The effectiveness of Plasma development with a total of 8 concessions managed by 8 cooperatives given to each village around the company has a positive impact on HCV management. This can avoid occupation activities in the HCV area by the community. As for the location of the Enclave, which is land owned by the community but does not want to be compensated, until now the condition is still a well-maintained secondary forest.

The results of document review through the HCV area in the 6 Estate, obtained information that there are areas of HCV 5 and 6. This shows that the rights to culture and important places for the surrounding community identified in the company area are also being managed properly. Currently, the company also has an agreement with the community who are members of the plasma management cooperative for monitoring and patrolling the HCV area, the company has also entered into an agreement with the community operating in the company's area not to hunt and trade wildlife. In addition, all access to enter the company's scope must also pass through a guard post, so that if there are indications of hunting or illegal logging activities, they can be anticipated immediately. The company has also approached relevant stakeholders, including:

- Submit a list of protected species found in the BKSDA area.
- Provide executive summary to relevant parties such as local government and local communities.
- Socialization regarding HCV is carried out periodically to find out the extent of community understanding of the existence of HCVs in the PT PMM and TJA areas.
- Make an agreement with the surrounding village to maintain the HCV area in the company area.

#### 7.12.6

The Certification Unit already has a policy stated in the SOP for Management and Monitoring of HCV Number SUP-SOP01-01 which is effective on October 1, 2019. The document states that in accordance with the company's sustainability principles, all employees are advised not to hunt, arrest, kill, and sale of protected rare animals and plants and report if any such activity is found. Maintain and not disturb the areas designated as HCV areas and report any illegal acts. Employees who do not comply will be subject to sanctions in accordance with applicable laws and regulations.

Based on the results of interviews with management, it is stated that disciplinary measures for workers who catch, harm or collect RTE species are also enforced in accordance with applicable laws and regulations. If the case is found, it will be reported to the local leadership to be reported to the BKSDA. Violation of this will be subject to maximum disciplinary sanctions by the company until it is reported to the authorities. The management also states that all employees are prohibited from capturing, injuring, maintaining, transporting and trading protected animals alive and dead. If there is a violation of the prohibition, the company will provide strict sanctions and criminal provisions and become the personal responsibility of the perpetrator. Some of the protective measures taken by the company are as follows:

- The company is committed to protecting and prohibiting the hunting of all types of wild animals that are included in the criteria for rare and endangered that are in the plantation area.

- The company will carry out continuous socialization and training activities on the protection of rare and endangered wild animals and their habitats to employees of contractor companies as well as to the community and other relevant stakeholders around the company.
- The company will investigate every case of violation and provide strict disciplinary sanctions (up to layoffs) to company employees who hunt, maintain, injure, harm and kill rare and endangered wildlife.
- For the management of rare and endangered wildlife both inside and around its concession area, the company will cooperate with government agencies or other competent related institutions.
- The company is committed to evaluating and reporting on the company's performance based on this policy regularly and openly through a semester report on the results of HCV management and involving stakeholders continuously.

Information related to the application of sanctions for employees in the form of disciplinary action in accordance with the provisions of national law is also listed on the HCV signboard which explains that "*anyone who violates will be reported to the authorities with the threat of punishment and fines*". The sanction is imposed by the company by giving the first warning letter to employees who violate work rules. Based on the results of interviews with company employees regarding animal protection, the company has committed to protecting animals that are within the scope of the company's management area, such as implementing a ban on hunting, killing and keeping wild animals within the company's environment. The procedure for animal protection also regulates the existence of sanctions or fines for those who violate these provisions.

In addition, the company has also carried out socialization about the existence of endangered plants and animals to employees and the surrounding community which is shown in the official report of the socialization which is proven based on the official report accompanied by photos and attendance lists, including:

- Socialization to Beringin Jaya Estate employees on 22 November 2022 was attended by 19 participants.
- Socialization to the surrounding community dated 6 February 2023.
- Socialization to employees of Beringin Jaya Estate on 18 July 2022 was attended by 93 people and on 14 November 2022 attended by 61 participants.
- Socialization to Bumi Permai Mill employees on 25 July 2022 attended by 36 participants.
- Socialization to Bumi Permai Estate employees on November 2, 2022 attended by 71 participants.
- Socialization to contractors on 15 August 2022 attended by 18 participants.
- Socialization to the surrounding community, namely Benua Puhun Village, Bunga Jadi, Rantau Humpang, Muara Kaman Ilir, Lebaho Ulaq, Bukit Jering, Lebak Mantan and Loleng Village on 12 December 2022.

Indirect socialization is also carried out by installing information boards and brochures warning signs related to conservation areas and the presence of protected rare plants and animals in places that are easily visible, such as area entrances, regional roads that are often crossed by the community, and other places other strategic areas such as offices, and other public facilities. Routine monitoring of HCV areas is also carried out every month by several personnel appointed by the company.

#### 7.12.7

Monitoring of protected areas in the period of 2022 is carried out regularly every month to ensure the security of the area. Monitoring activities are carried out in all areas of the company's management. This monitoring is carried out to see the progress of the results of HCV management from the initial stage to the current condition. The company also monitors the diversity of flora and fauna which is routinely carried out every semester by showing the results of HCV monitoring carried out in Semesters 1 and 2 of 2022. The results of observing fauna in the plantation area are still found to be several types of protected animals that are included in the protection status according to the IUCN, CITES and Ministry of Environment and Forestry Regulation Number 106 of 2018 including Bornean Orangutan (*Pongo Pygmaeus*), Proboscis monkey (*Nasalis larvatus*), Black Hornbill (*Anthraceros malayanus*), Rhinoceros Hornbill (*Buceros rhinoceros*), Red Langur (*Presbytis rubicunda*), Silvery Lutung (*Trachypithecus cristata*) and many other protected species. The results of interviews with employees also stated that the Root Tiger (*Prionailurus bengalensis*) and Stork (*Ciconia episcopus*) species were often found around the HCV area.

The company also conducts monthly monitoring and evaluation for the management of HCV areas where this activity aims to identify risks and impacts on conservation areas and improve protection efforts. This activity is evidenced in the PT PMM and PT TJA HCV Management Reports and Reviews for Semesters 1 and 2 of 2022 which contains evaluations and recommendations for management and monitoring as an effort to improve HCV management activities for the next semester. Based on the results of the review, several management recommendations were obtained, including:

- Training/socialization on HCV and the environment to be carried out continuously to remind residents/employees of the importance of protecting the environment.
- Maintain the existing HCV areas in the company's operational areas.
- Cooperate with management with employees and the surrounding community in protecting the HCV area.
- Continue to monitor the HCV management plan in conservation areas.
- Cooperate with the government and local residents in protecting HCV and the surrounding environment.

All evaluation results have been reviewed and adjusted to the HCV management program in the next period. the evaluation results also show an increase in the results of the management of the HCV area where for the area that was previously an oil palm planted area on the watershed border, for 2023 it is determined to be an HCV area. In addition, the management and monitoring of HCVs has been carried out in a participatory manner by involving communities around the plantations, one of which is an agreement with the community and plasma managers to jointly protect the HCV area.

<b>7.12.4 Closed</b>	<b>Status: Non conformity number 2023.01 with major category</b>	
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**3.2 Conformity Checklist of Certificate and Trademark Use**

<b>1.</b>	<b>Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client</b>	<b>X or √</b>
<b>ASA 1-4</b>	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product).	√
	<b>Status: Comply</b>	
<b>2.</b>	<b>Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use</b>	<b>X or √</b>
<b>ASA 1-4</b>	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product).	√
	<b>Status: Comply</b>	
<b>3.</b>	<b>Implementation of Certificate and Trademark is not used on product</b>	<b>X or √</b>
<b>ASA 1-4</b>	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product).	√
	<b>Status: Comply</b>	
<b>4.</b>	<b>Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.</b>	<b>X or √</b>
<b>ASA 1-4</b>	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product).	√
	<b>Status: Comply</b>	

3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of MP Evans Group PLC against the rules for partial certification was determined through Self-Assessment in accordance with RSPO Certification System clause 5.5.3. A summary of findings is as stated below.

MP Evans Group PLC Time Bound Plan (TBP) is explained in table 1.10. MP Evans Group PLC has twenty-seven (27) management units with five (5) mills. MP Evans Group PLC has informed the TBP progress, MUTU has considered that MP Evans Group PLC is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by MP Evans Group PLC on 3 October 2022,

MUTU has verified partial certification for un-certified unit's subsidiary of MP Evans Group PLC based on their Time Bound Plan. There are one (1) uncertified mill and six (7) uncertified estates of MP Evans Group PLC. 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.

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Yes, and positive assurance is developed under MP Evans Group PLC</p> <p><b>Auditor verification</b> Based on the document review, there is a company internal audit that was conducted on 23-24 August 2021 and the positive assurance is at this table that is also been verified.</p>
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)	<ul style="list-style-type: none"> <li>- <b>PT. Simpang Kiri Plantation Indonesia.</b> RACP is not applied for this unit because the last land clearing was conducted before November 2005. The unit does not have mill.</li> <li>- <b>PT. Evans Lestari (PT. EL)</b> has conducted HCV and SIA identification by Forestry Faculty of Institute Pertanian Bogor (IPB) on March 2013 led by Dr. Ir. Jarwadi Budi Hernowo Msc. Before land clearing, therefore the unit has no liability related to RACP. PT Evans Lestari also conducted NPP on 17 December 2013 conducted by Certification Body of Control Union.</li> <li>- <b>PT Bumi Mas Agro</b> has an HCV identification document made in December 2014 in collaboration with PT Sonokeling with a total HCV area of 382.72 Ha</li> </ul> <p><b>Auditor verification</b> Based on internal audit results and evidence provided (communication to RSPO on liability disclosure) the three uncertified units of: <b>PT Simpang Kiri Plantation Indonesia</b> Last land clearing happened before November 2005 and there is no new land clearing of new planting.</p>



		<p><b>PT Evans Lestari</b> Land clearing was conducted after November 2005 but has been first conducted HCV identification before land clearing. Liability of disclosure has been sent to RSPO Compensation Team on 23 July 2014.</p>
2.1.3	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<p>New planting/land clearing after 1<sup>st</sup> January 2010.</p> <p><b>Auditor verification</b> Based on internal audit, documented time of land clearing and liability disclosure sent to RSPO, there is new planting/land clearing after 1<sup>st</sup> January 2010 for PT Gunung Pelawan Lestari and PT Evans Lestari but NPP has been conducted for these units. Evidence of submission to RSPO is provided and the NPP notification are at RSPO website.</p>
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p>There are no land conflicts.</p> <p><b>Auditor verification</b> Based on evidence provided, the company merely conducted planting on the area that has been compensated from the land owner by FPIC. The documentation of each land compensation/leasing is documented.</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p>There is no labor disputes. There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p><b>Auditor verification</b> There is no indication of labor disputes. There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p>
2.1.6	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1 (it has changed be Criterion 4.2 in P&C 2018).	<p>Yes, there is process for land legality.</p> <p><b>Auditor verification</b> Land legal process is still going on and there is a detail update progress documented by the company for each year. PT Simpang Kiri Plantation Indonesia and PT Bumi Mas Agro already have been HGU.</p> <p><b>Update legal for PT Evans Lestari:</b> the company has got plantation business permit (IUP) from Bupati Decree of Musi Rawas No. 891/KPTS/Disbun/2012 dated 12 November 2012 for 20,000 ha. It is in accordance with the scale of the company location permit (Decree of Bupati Musi Rawas No. 578/KPTS/BPM-PTP/2012 dated 30 October 2012 for 20,000 ha). However, the location permit has been expired – need further HGU process information or any other legal process.</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 1.2 and 1.3 Onsite Assessment

NCR No.	:		Issued by	:	
Date Issued	:		Time Limit	:	
NC Grade	:		Date of Closing	:	
Standard Ref. & Requirement	:				
Evidence observed (filled by auditor):					
<b><i>There is no nonconformity during the onsite audit assessment ASA 1.2 + 1.3</i></b>					
Non-Conformance Description (filled by auditor):					
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	:				

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA 1.4

<b>NCR No.</b>	: 2023.01	<b>Issued by</b>	: Radytio Puspanjana
<b>Date Issued</b>	: 18 March 2023	<b>Time Limit</b>	: 16 June 2023
<b>NC Grade</b>	: Major	<b>Date of Closing</b>	: 16 June 2023
<b>Standard Ref. &amp; Requirement</b>	<p>7.12.4  Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plans to protect and/ or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>		
<p><b>Evidence observed (filled by auditor):</b>  Regarding the HCV area management and protection plan, it is contained in several documents, namely:</p> <p>a. PT PMM &amp; PT TJA January 2022 HCV review document describes the HCV management plan with</p> <ul style="list-style-type: none"> <li>- Making boundary signs in oil palm planted areas and non-oil palm planted areas and installing HCV signboards</li> <li>- Suppress harmful activities in the area such as prohibition on hunting, burning, cutting down trees and using chemicals, especially in riparian areas.</li> <li>- Perform maintenance activities manually without chemicals.</li> </ul> <p>b. SOP document for river bank buffer management Number SUS SOP01-01 dated 1 October 2012 which explains:</p> <ul style="list-style-type: none"> <li>- Small river &lt; 10 meters, HCV area 50 meters to the left and right of the river.</li> <li>- Big river &gt; 10 meters, HCV area 100 meters to the left and right of the river.</li> <li>- Making clear markings on HCVs in the field according to the map identified in a participatory manner.</li> </ul> <p>c. The company shows PT PPM &amp; TJA's 2022-2023 HCV management and monitoring plan document which explains that HCV patrols are carried out every month to check that there are no spraying of herbicides, pesticides 50 m from the riverbank, only manual maintenance activities are permitted and maintenance of warning signs/notifications conservation area is conducted every month.</p> <p>As the implementation of these procedures during the audit process, evidence of the implementation of the plan can be shown, including:</p> <ul style="list-style-type: none"> <li>- PT PPM &amp; PT TJA's HCV review document from April 2022 to April 2023 describes the realization of river bank management, maintenance of HCV boundary signs and HCV signs, the last realization in June 2022.</li> <li>- HCV patrols for the period April 2022 to April 2023 explained that the company has been monitoring HCV areas and the results are that the HCV areas are still maintained.</li> </ul> <p>However, based on the results of field visits in the Block I25/J25 Prima Estate Block I25/J25 riverbank HCV area, it is known that there are no signs of a conservation area boundary on the riverbank. In that area, open fertilization activities with the type Manuring Sulfur were also found and traces of pesticide spraying were also found in the river border area. This was also confirmed by the results of verification of the Foreman Work Form (FKM) documents for pesticide and fertilizer applications, also explaining that pesticide applications (spraying circle paths) had been carried out in block I25 on 5 December 2022 and manuring sulfur in block I25 on 1 April 2022.</p> <p><b>Non-Conformance Description (filled by auditor):</b>  The company has not been able to show evidence of the implementation of the water resources HCV management plan in accordance with the HCV Management plan and SOP they have.</p>			

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

- The HCV management plan for riparian areas in the form of marking spray limits and chemical application has not been fully implemented.
- Field assistants and employees do not fully understand the management of HCVs, especially riparian areas.

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

- Paint (red) markings on the outermost palm trees that enter the riparian area along the river flow in block I25/J25 PME 2.
- The S&C Department provides socialization regarding spray limits and application of chemicals on the riparian to field assistants and workers/employees who handle chemical applications (fertilizers and sprays) on a regular basis.

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

The S&C assistant and the agronomy assistant carry out regular and continuous monitoring of the HCV area to ensure the HCV area is free from spraying and fertilizing activities.

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

**Auditor verification 26 April 2023**

The company shows evidence of improvement in the form of:

- A document on socialization activities regarding the HCV area on March 29, 2023 to fertilizer and spray employees at Bumi Permai Estate which explains the management of the HCV area, namely regarding the prohibition of agrochemical applications in HCV areas in the form of riparian. Attached photos and attendance list of socialization activities.
- Documents on outreach activities regarding the HCV area on 28 March 2023 to staff at Bumi Permai Estate which explains the procedures for managing the HCV area.
- A document on socialization activities regarding the HCV area on March 28, 2023 to fertilizer and spray employees at Lembuswana Estate which explains the management of the HCV area, namely related to the prohibition of agrochemical applications in HCV areas in the form of riparian. Attached photos and attendance list of socialization activities.
- Document on outreach activities regarding the HCV area on 25 March 2023 to fertilizer and spray employees at Rahayu Estate which explains the management of the HCV area, namely related to the prohibition of agrochemical applications in HCV areas in the form of riparian. Attached photos and attendance list of socialization activities.
- Documents on outreach activities regarding the HCV area on 27 March 2023 to staff at Rahayu Estate who explained the procedures for managing the HCV area.

**Auditor verification 5 May 2023**

The company shows evidence of improvement in the form of:

- Minutes of the riparian HCV area marking dated 20 March 2023 at Prima Estate in blocks J23, J24, J25, I25, I26 and I28 PME Main division. Attached are the coordinates for marking the boundaries of the HCV area.
- Document of outreach activities regarding the HCV area on March 28, 2023 to staff who explain the procedures for managing the riparian HCV area at Lembuswana Estate.

Based on this explanation, it is concluded that this discrepancy has been **Complied** and will be observed in the next activity.

**Verified by** : **Radytio Puspanjana**

3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	1.1.5	<p><b>An up-to-date list of contacts and detailed information on stakeholders and appointed representatives is available</b></p> <p>Companies have the opportunity to update the list of stakeholders they have. For example, LB3 transporters and internal stakeholders.</p>
2	4.2.3	<p><b>The unit of certification informs the parties of the progress of complaint handling, including the agreed time frame, and the results are made available and communicated to relevant stakeholders.</b></p> <p>Based on the results of interviews with the Manpower Office, it is known that there are industrial relations problems at PT PMM. The industrial relations problem has reached the mediation stage and the Manpower Office has issued recommendations for this matter. The company has shown letter No. 036/PMM-HR/Ext/II/2023 dated 20 February 2023 which stated that he received advice from the Mediator. In this regard, the Company has the opportunity to ensure the realization of the recommendations given by the Industrial Relations Mediator.</p>
3	4.4.1	<p><b>Documents are available showing legal ownership or lease, or customary land use permits granted by customary land owners (ulayat) through a FPIC process. Documents are available relating to the history of land ownership and actual legal or customary use.</b></p> <p>Based on the results of the document review, it is known that the scope of RSPO certification for PT PMM and PT TJA is 20,522.20 Ha with core and plasma coverage. Out of this area, 11,262.04 Ha has HGU and HGB.</p> <p>In the RSPO notification regarding the latest Cultivation Rights dated April 1, 2020, among others stated:</p> <ol style="list-style-type: none"> <li>1. For Initial Certification, the Unit of Certification must have HGU and IUP or other acceptable legal alternatives as defined in the National Interpretation; And</li> <li>2. For Recertification audits, Certification Units may continue their certification as long as there is sufficient concrete evidence that the company has taken steps to obtain the HGU and must comply with all requirements at that time.</li> <li>3. Surveillance Audit can be continued as stated in the previous announcement</li> </ol> <p>These requirements are effective as of the date announced and the BoG will review the implementation of this decision and provide further guidance in the future. Based on this, the company has the opportunity to show positive progress in obtaining HGU for all areas within the scope of certification that do not yet have HGU.</p>
4	7.7.5	<p><b>Drainability assessments are carried out on plantations planted on peat following the RSPO Drainability Assessment Procedure, or other RSPO-approved method, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) prior to replanting. The results of the assessment are used to determine the timeframe for replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravity drainability limit for peat. If oil palm is replaced gradually, it is replaced by another commodity crop that is more suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</b></p> <p>The company has the opportunity to ensure that a drainability assessment is carried out in accordance with the provisions in the RSPO Drainability Assessment Procedure.</p>

3.4.4. Noteworthy Positive Components

No	Description
1	Commitment to implement the principles of sustainable oil palm plantation management.
2	Has utilized renewable energy sources through the Biogas Plan (Methane Capture).
3	Has obtained ISPO and ISCC certificates.

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



Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>Bipartite Cooperation of PT PMM and PT TJA</b></p> <ul style="list-style-type: none"> <li>• All workers are permanent workers.</li> <li>• There is an increase in wages for 2023. The company also has a wage scale for monthly employees.</li> <li>• There are no complaints related to wages or overtime or others.</li> <li>• The company has provided PPE for employees.</li> <li>• There are no work accidents with fatal category in each unit.</li> <li>• There are no complaints from employees who cannot be resolved bipartite.</li> <li>• There is no issue of the use of children's labor</li> <li>• Company has paid wages is accordance with applicable regulation.</li> <li>• Company has given a visit to village to identifie the village need</li> </ul>	<p>There was no negative issue that need further verification.</p>
<p><b>Head of Rantau Hempang Village, previous land owner and Head of Koperasi Karya Bersama</b></p> <ul style="list-style-type: none"> <li>• Relationships and communication between villages and companies well established.</li> <li>• The company provides assistance to villages submitted through proposals.</li> <li>• There are no land dispute issues or environmental pollution.</li> <li>• The village feels the positive impact of the company's existence</li> <li>• Compensation or handover of land with the company is established based on negotiations from both parties. There is no claim again by Previous Land owner.</li> <li>• There are still cooperative lands that do not yet have HGU. The land is still in the process of issuing HGU</li> <li>• The company has conducted regular health checks.</li> </ul>	<p>There was no negative issue that need further verification.</p>
<p><b>Etam Sukses Bersama employee cooperative Dated : 13 March 2023.</b></p> <p>The employee cooperative is engaged in the provision of staple goods. There is a mandatory contribution of IDR 100,000 and a basic contribution of IDR 20,000. The cooperative has a deed of establishment in 2017, the cooperative has carried out annual meeting and profit sharing in 2022. The scope of the cooperative is 8 estates. The support from companies for cooperative activities in the form of capital loans and cooperative office buildings. There is no prohibition on cooperatives and there are no complaints from the chairman of the cooperative to the company.</p>	<p>There are no negative issues that need further verification. The company already has an employee cooperative in accordance with regulations. It has been described in related indicators</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>Local Contractors (Transporting FFB, Jankos and Compost)</b> Mitra Sawit Mandiri Cooperative and Forward to Build Cooperative</p> <p>It was explained that the SPK regulates the time period, K3 requirements, health and the number of units used. There are no obstacles in terms of payment of work contracts.</p> <p>The contractor uses workers from the surrounding community and PPE is provided by the company and this has been stated in the work contract. As well as registration and payment of Employment and Health BPJS to employees (Driver Units).</p> <p>Apart from being engaged in the transportation of FFB, Jakos and compost, the cooperative is also a cooperative fostered by the company and is fully managed.</p> <p>Based on the interview results, it was stated that the company had carried out its obligations as stated in the MoU and had cooperated very well. Legal price fixing refers to the stipulation of the Plantation Service. The company can also show the entire use of the budget used in plantation maintenance. so that all members of the cooperative can believe that the cooperation carried out takes place honestly and without injustice. The company also regularly and regularly informs the latest prices and makes payments.</p> <p>The informant stated that for approximately 15 years of working together, the company had carried out all the agreements contained in the work contract, there had never been a delay in payment or other matters related to the cooperation relationship. The assistance provided by the company is also in accordance with the RSPO principles where procedures related to sustainable plantations are maximally implemented. All members of the cooperative are also aware of protected areas (HCV) where areas that are allowed to remain as forest cannot be cleared, burned, and hunting conducted in the area.</p>	<p>There are no negative issues that need further verification. The company already has an employee cooperative in accordance with regulations. It has been described in related indicators</p>
<p><b>Gender Committee of PT PMM</b></p> <ul style="list-style-type: none"> <li>• The structure of the gender committee consists of male and female workers</li> <li>• Work programs of the gender committee include posyandu, health counseling, child development, recitation, etc</li> <li>• No complaints from employees were submitted to the gender committee</li> <li>• The company has provided employees with reproductive rights, such as menstruation leave, maternity leave and miscarriage leave.</li> <li>• The company also provides a nursing cubicle located in a daycare center in each employee's housing.</li> </ul>	<p>There was no negative issue that need further verification.</p>



Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>Subur Makmur Cooperative</b></p> <ul style="list-style-type: none"> <li>The Subur Makmur Cooperative is located in Bukit Jering Village with an area of 401.48 hectares with 340 household members.</li> <li>The legality of the land for the plantation is HGU.</li> <li>The management of the cooperative is carried out in full by the management of PT PMM</li> <li>The FFB price refers to the FFB price determined by the Kalimantan Timur Province Plantation Agency. There were no complaints regarding the payment of FFB.</li> </ul>	<p>There was no negative issue that need further verification.</p>
<p><b>FFB supplier CV Tunas Sawit Sejahtera</b></p> <ul style="list-style-type: none"> <li>Indirect FFB suppliers (agents) from around 500 independent smallholders.</li> <li>The area of independent smallholders' land comes from the transmigration area.</li> <li>Has had a cooperation agreement for the sale and purchase of FFB since 2023.</li> <li>FFB prices refer to market prices. Any price changes that occur will be notified via email to the supplier.</li> <li>There were no complaints regarding the payment of FFB. FFB payments are made every week.</li> </ul>	<p>There was no negative issue that need further verification.</p>
<p><b>Manpower Agency of Kutai Kartanegara Regency</b></p> <ul style="list-style-type: none"> <li>There are reports from employees on behalf of Aftar and Mutmainah regarding layoffs. Recommendations have been issued from the Manpower Office regarding the bipartite settlement</li> <li>PT PMM and TJA have 3 unions that have been registered with the agency.</li> <li>The company has extended the Company Regulations.</li> <li>The 2023 Kukar Regency minimum wage has been in force since January 2023.</li> <li>The company reports use of PKWT workers.</li> <li>The company submitted a copy of the P2K3 report and from this report it is known that there have been no fatal work accidents during 2022.</li> </ul>	<p>There was no negative issue that need further verification.</p>
<p><b>Loleng Village and previous land owners (10 people)</b></p> <ul style="list-style-type: none"> <li>There are no complaints related to land disputes or environmental pollution.</li> <li>The company has provided CSR to the village, such as clean water assistance, assistance for building houses of worship, compensation for orphans, Qurban, etc.</li> <li>There is no land overlap with other businesses or mining areas.</li> <li>There have been no land fires in the last 12 months.</li> <li>The land compensation/land acquisition process is carried out with FPIC. There was no coercion during land acquisition.</li> <li>Villagers who receive compensation are members of the Maju Pembangunan Cooperative in partnership with PT PMM. There is input from cooperative members, that is the actual</li> </ul>	<p>There are no negative issues that need further clarification. Complaints related to plasma area for each member have been explained by the management that the plasma area is in accordance with the MoU between the company and the cooperative.</p>

<b>Public Issues (Institution/ NGO/Community)</b>	<b>Auditor Verification</b>
<p>land area currently not in accordance with the initial agreement. Each farmer gets plasma land of less than 2 hectares. The total area of the plasma cooperative is 772 hectares with 1,116 household members.</p>	
<p><b>Benua Puhun Village Head of Village and previous Land Owner</b></p> <ul style="list-style-type: none"> <li>• The relationship between the village and the company is going well.</li> <li>• Village population consists of indigenous people from the Kutai tribe and migrants from outside the village. However, there is no longer any local wisdom preserved in the village.</li> <li>• There is no overlap between the company's area and other businesses.</li> <li>• There are no issues of land disputes and environmental pollution issues.</li> <li>• The process of land acquisition and compensation for growing crops is carried out with FPIC. There is no element of coercion in land acquisition.</li> <li>• There were complaints related to fertilizing activities at the Tanah Sama Cooperative, including that fertilization should not be carried out in flooded areas and during rain events.</li> </ul>	<p>Regarding complaints from members of the Tanah Sama cooperative, the auditor has verified them and explained in indicator 6.4.4.</p>

4.0	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>
4.1	<b>Formal Sign-off of Assessment Findings</b>
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p style="text-align: center;">Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end; margin-top: 20px;"> <div style="text-align: center;"> <p><b>PT Prima Mitrajaya Mandiri</b> <b>Management Representative</b></p>  <p><b><u>Donald Ginting</u></b> Friday, 16 June 2023</p> </div> <div style="text-align: center;"> <p><b>Mutuagung Lestari</b> <b>Lead Auditor</b></p>  <p><b><u>Rizliani Aprianita Hasibuan</u></b> Friday, 16 June 2023</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Environmental Agency	Kutai Kartanegara Regency	-	By Phone	14 March 2023		✓
2	Land Agency	Kutai Kartanegara Regency	-	By Phone	14 March 2023		✓
3	Cooperative <ul style="list-style-type: none"> <li>• Karya Bersama (5 worker)</li> <li>• Mitra Sejahtera (7 worker)</li> <li>• Subur Makmur (3 worker)</li> <li>• Grenseng Indah (5 worker)</li> </ul>	Kutai Kartanegara Regency	-	By Phone	14 March 2023	✓	
4	Manpower and Transmigration Agency	Kutai Kartanegara Regency	-	By Phone	14 March 2023	✓	
5	Bipartite Cooperation PT PMM	Kutai Kartanegara Regency	-	By Phone		✓	
6	Bipartite Cooperation PT TJA	Kutai Kartanegara Regency	-	By Phone		✓	
7	PT Fisco Indopratama – Civil Contractor	Kutai Kartanegara Regency	-	By Phone		✓	
8	FFB Supplier – CV Tunas Sawit Sejahtera	Kutai Kartanegara Regency	-	By Phone	14 March 2023	✓	
9	Local Contractors (Transporting FFB, EFB and Compost) Mitra Sawit Mandiri Cooperative and Maju Membangun Cooperative	Kutai Kartanegara Regency	-	By Phone	13 March 2023	✓	
10	Prima Estate (9 Workers)	Kutai Kartanegara Regency		Direct Interview	17 March 2023	✓	
11	Bumi Permai Mill (15 Workers)	Kutai Kartanegara Regency		Direct Interview	16 March 2023	✓	
12	Beringin Jaya Estate (12 Workers)	Kutai Kartanegara Regency		Direct Interview	16 March 2023	✓	
13	Mahakam Estate (10 Workers)	Kutai Kartanegara Regency		Direct Interview	15 March 2023	✓	
14	Rahayu Estate (8 Workers)	Kutai Kartanegara Regency		Direct Interview	14 March 2023	✓	
15	Rahayu Mill (15 Workers)	Kutai Kartanegara Regency		Direct Interview	14 March 2023	✓	
16	WALHI	Indonesia		Questionnaire	08 March 2023		✓
17	WWF	Indonesia		Questionnaire	08 March 2023		✓
18	Sawit Watch	Indonesia	-	Questionnaire	08 March 2023		✓
19	Loleng Village and previous land owner	Kutai Kartanegara Regency		By Phone	14 March 2023	✓	
20	Benua Puhun Village	Kutai Kartanegara		By Phone	16 March 2023	✓	

		Regency					
21	Bukit Jering Village and previous land owner	Kutai Kartanegara Regency		By Phone		✓	
22	Muara Kaman Ilir Village	Kutai Kartanegara Regency		By Phone			✓
23	Etam Sukses Bersama employee cooperative	PT PMM	-	Direct Interview	13 March 2023	✓	
24	<b>Rahayu Mill</b> <ul style="list-style-type: none"> <li>• 1 hazardous waste warehouse officer</li> <li>• 2 Biogas officer</li> <li>• 1 WWTP operators.</li> <li>• 1 warehouse officer.</li> </ul>	PT TJA	-	Field observation and direct interview	14 March 2023	✓	
25	<b>Beringin Jaya Estate</b> <ul style="list-style-type: none"> <li>• 1 workers of daycare</li> <li>• 6 harvester</li> <li>• 3 picker</li> <li>• 1 foreman of harvesting</li> <li>• 2 manure workers</li> <li>• 1 foreman of manuring</li> <li>• 3 Pesticide aplicator</li> <li>• 1 warehouse officer</li> <li>• 1 hazardous waste warehouse officer</li> <li>• 1 generator officer</li> </ul>	PT PMM	-	Field observation and direct interview	16 March 2023	✓	
26	<b>Rahayu Estate</b> <ul style="list-style-type: none"> <li>• 2 harvesters</li> <li>• 2 pickers</li> <li>• 1 foreman of LA and 1 LA operator.</li> </ul>	PT TJA	-	Field observation and direct interview	14 March 2023	✓	
27	<b>Gender Committee</b>	PT PMM	-	Direct Interview	13 March 2023	✓	
28	<b>Plantation Agency</b>	Kutai Kartanegara Regency	-	By Phone	14 March 2023		✓
29	<b>Mahakam Estate</b> <ul style="list-style-type: none"> <li>• 2 harvesters</li> <li>• 2 pickers</li> <li>• 2 Pesticide aplicator</li> </ul>	PT TJA	-	Field observation and direct interview	14 March 2023	✓	
30	<b>Prima Estate</b> <ul style="list-style-type: none"> <li>• 1 workers of daycare</li> <li>• 5 harvester</li> <li>• 3 picker</li> <li>• 3 foreman of harvesting</li> <li>• 2 manure workers</li> <li>• 1 foreman of manuring</li> <li>• 3 Pesticide aplicator</li> <li>• 1 warehouse officer</li> </ul>	PT PMM	-	Field observation and direct interview	17 March 2023	✓	
31	Bumi Permai POM (15 Workers)	Kutai Kartanegara Regency	-	Direct Interview	16 March 2023	✓	

### Appendix 2. Assessment Program

DATE	13 – 18 March 2023	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
<b>Monday, 13 March 2023</b>		
04.55 – 08.10	<b>Jakarta (CGK) – Samarinda (AAP) – ID 6672</b>	<b>All Auditor</b>
09.00 – 12.00	<b>Samarinda – Site</b>	
14.00 – 15.00	<b>Opening Meeting</b> <ul style="list-style-type: none"> <li>Auditee Speech (Introduction of PIC, Profile of Certified Management Unit</li> <li>Auditor Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification).</li> </ul>	
15.00 – 17.00	<ul style="list-style-type: none"> <li>Public Consultation with Local Contractor &amp; Supplier</li> <li>Direct interview with internal stakeholders (ex. Bipartite or Labour Union, Gender Committee and Cooperative committee members).</li> </ul>	
<b>Tuesday, 14 March 2023</b>		
08.00 – 11.00	<ul style="list-style-type: none"> <li>Public consultation to Government Agencies of Kutai Kartanegara by phone</li> <li>Stakeholder consultation (direct) to affected communities surrounding the plantations and previous land owner.</li> </ul> <p>Field Observation to Rahayu Estate &amp; Koperasi Karya Bersama Aspect to verified:</p> <ul style="list-style-type: none"> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li> <li>Implementation of Environmental and Conservation/ HCV management.</li> <li>Implementation of Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Clinic and Waste Management.</li> <li>Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application).</li> <li>Implementation of Occupational Health &amp; Safety Aspect.</li> </ul>	<b>AAS</b>
		<b>TYO</b>
		<b>RAH</b>
		<b>RAN</b>
12.00 – 14.00	<b>Break</b>	
14.00 – 17.00	<b>Field Observation Rahayu POM</b> <ul style="list-style-type: none"> <li>Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Dispatch CPO)</li> <li>Inspection to Chemical Storage, Hazardous Waste Storage, Workshop, POME Pond &amp; Land Application.</li> <li>Implementation of Employment &amp; Occupational Health &amp; Safety Aspect, Processing Activity &amp; Fire Control Simulation.</li> </ul>	<b>AAS</b> <b>TIO</b> <b>RAN/RAH</b>
<b>Wednesday, 15 March 2023</b>		
08.00 – 12.00	Field Observation to Mahakam Estate & Koperasi Mitra Sejahtera Aspect to verified: <ul style="list-style-type: none"> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li> <li>Implementation of Environmental and Conservation/ HCV management.</li> </ul>	<b>AAS</b> <b>TIO</b>

DATE	13 – 18 March 2023	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> <li>Implementation of Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Clinic and Waste Management).</li> <li>Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application).</li> <li>Implementation of Occupational Health &amp; Safety Aspect.</li> </ul>	<b>RAN/RAH</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 17.00	<ul style="list-style-type: none"> <li>Document review and completing audit checklist</li> <li>Presentation of daily progress</li> </ul>	<b>All Auditor</b>
<b>Thursday, 16 March 2023</b>		
08.00 – 12.00	<b>Field Observation to Beringin Jaya Estate; Koperasi Subur Makmur &amp; Koperasi Grenseng Indah</b> Aspect to verified: <ul style="list-style-type: none"> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li> <li>Implementation of Environmental and Conservation/ HCV management.</li> <li>Implementation of Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Clinic and Waste Management).</li> <li>Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application).</li> <li>Implementation of Occupational Health &amp; Safety Aspect.</li> </ul>	<b>AAS</b>  <b>TIO</b>  <b>RAN/RAH</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 17.00	<b>Field Observation Bumi Permai POM</b> <ul style="list-style-type: none"> <li>Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Dispatch CPO)</li> <li>Inspection to Chemical Storage, Hazardous Waste Storage, Workshop, POME Pond &amp; Land Application.</li> <li>Implementation of Employment &amp; Occupational Health &amp; Safety Aspect, Processing Activity &amp; Fire Control Simulation.</li> </ul>	<b>AAS</b>  <b>TIO</b>  <b>RAN/RAH</b>
<b>Friday, 17 March 2023</b>		
08.00 – 12.00	<b>Field Observation to Prima Estate</b> Aspect to verified: <ul style="list-style-type: none"> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li> <li>Implementation of Environmental and Conservation/ HCV management.</li> <li>Implementation of Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Clinic and Waste Management).</li> <li>Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application).</li> <li>Implementation of Occupational Health &amp; Safety Aspect.</li> </ul>	<b>AAS</b>  <b>TIO</b>  <b>RAN/RAH</b>

DATE	13 – 18 March 2023	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 17.00	<ul style="list-style-type: none"> <li>• Document review and completing audit checklist</li> <li>• Presentation of daily progress</li> </ul>	<b>All Auditor</b>
<b>Saturday, 18 March 2023</b>		
08.00 – 11.00	<ul style="list-style-type: none"> <li>• Continue document verification</li> </ul>	<b>All Auditor</b>
11.00 – 14.00	<ul style="list-style-type: none"> <li>• Internal discussion and break</li> </ul>	<b>All Auditor</b>
14.00 – 16.00	<b>Closing Meeting</b>	<b>All Auditor</b>
<b>Sunday, 19 March 2023</b>		
08.50 – 10.00	Flight Samarinda – Jakarta (ID 6673)	<b>All Auditor</b>