

***Roundtable on Sustainable Palm Oil Certification
RSPO***

[✓] Initial Certification

Name of Management Organisation : Bangkirai Palm Oil Mill, PT Jaya Mandiri Sukses – subsidiary of Eagle High Plantation Tbk.

Plantation Name : PT Jaya Mandiri Sukses: Bangkirai Estate; Gaharu Estate; Kulim Estate; Angsana Estate; Trembesi Estate and Jatimas Estate

Location : Village of Perian and Muara Aloh, Sub District of Muara Muntai, District of Kutai Kartanegara, Province of East Kalimantan, Indonesia

Certificate Code : **MUTU-RSPO/188**

Date of Certificate Issue : 08 September 2023 Date of License Issue : 08 September 2023

Date of Certificate Expiry : 07 September 2028 Date of License Expiry : 07 September 2024

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
IC	14-18 November 2022	Rizliani Aprianita Hasibuan (Lead Auditor), Asystasya A. Silalahi, Radityo Puspanjana, Darwin Simatupang.	Harso Yuli Antena	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
IC	08 September 2023

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Figure 1. Location Map of PT Jaya Mandiri Sukses

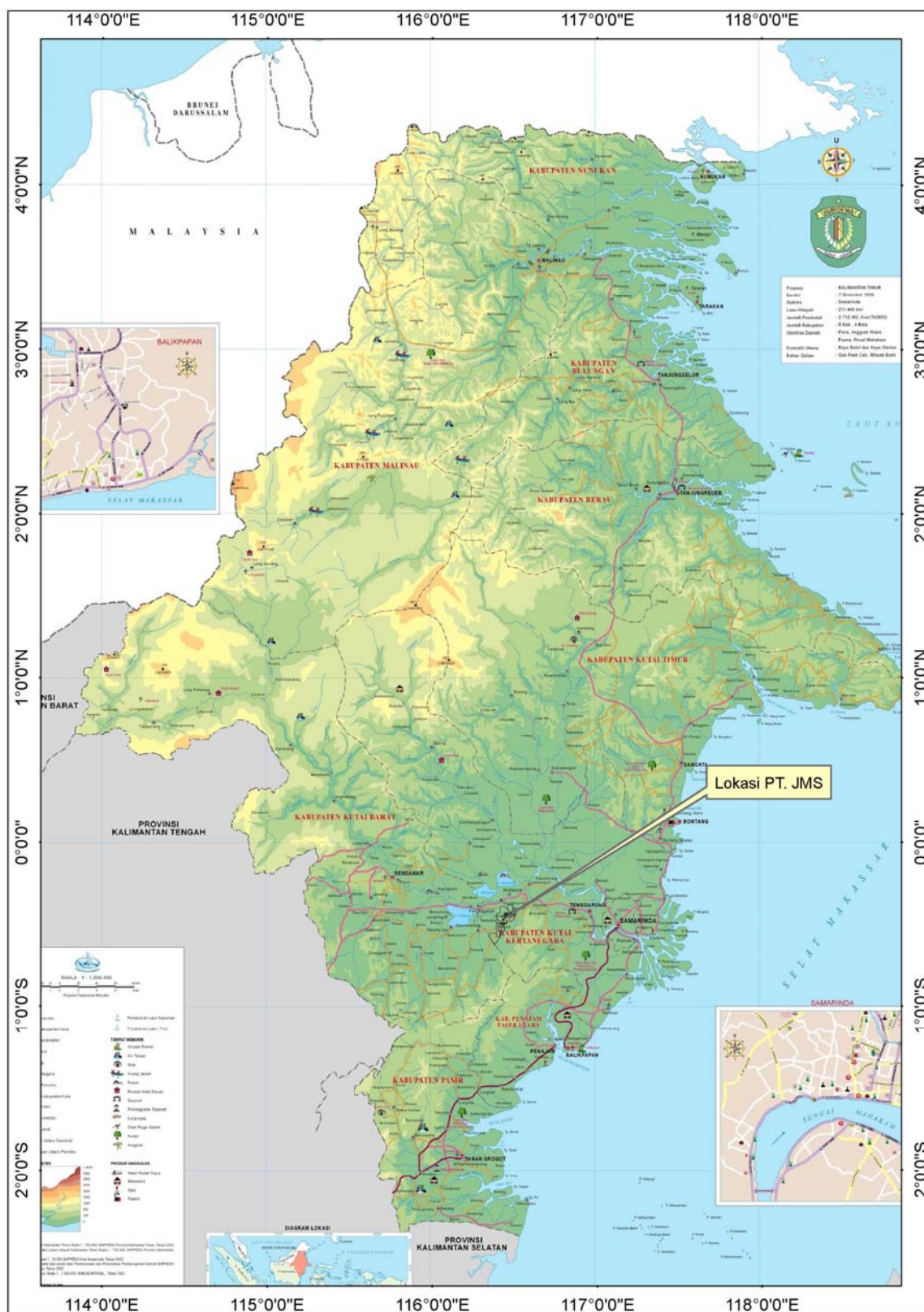
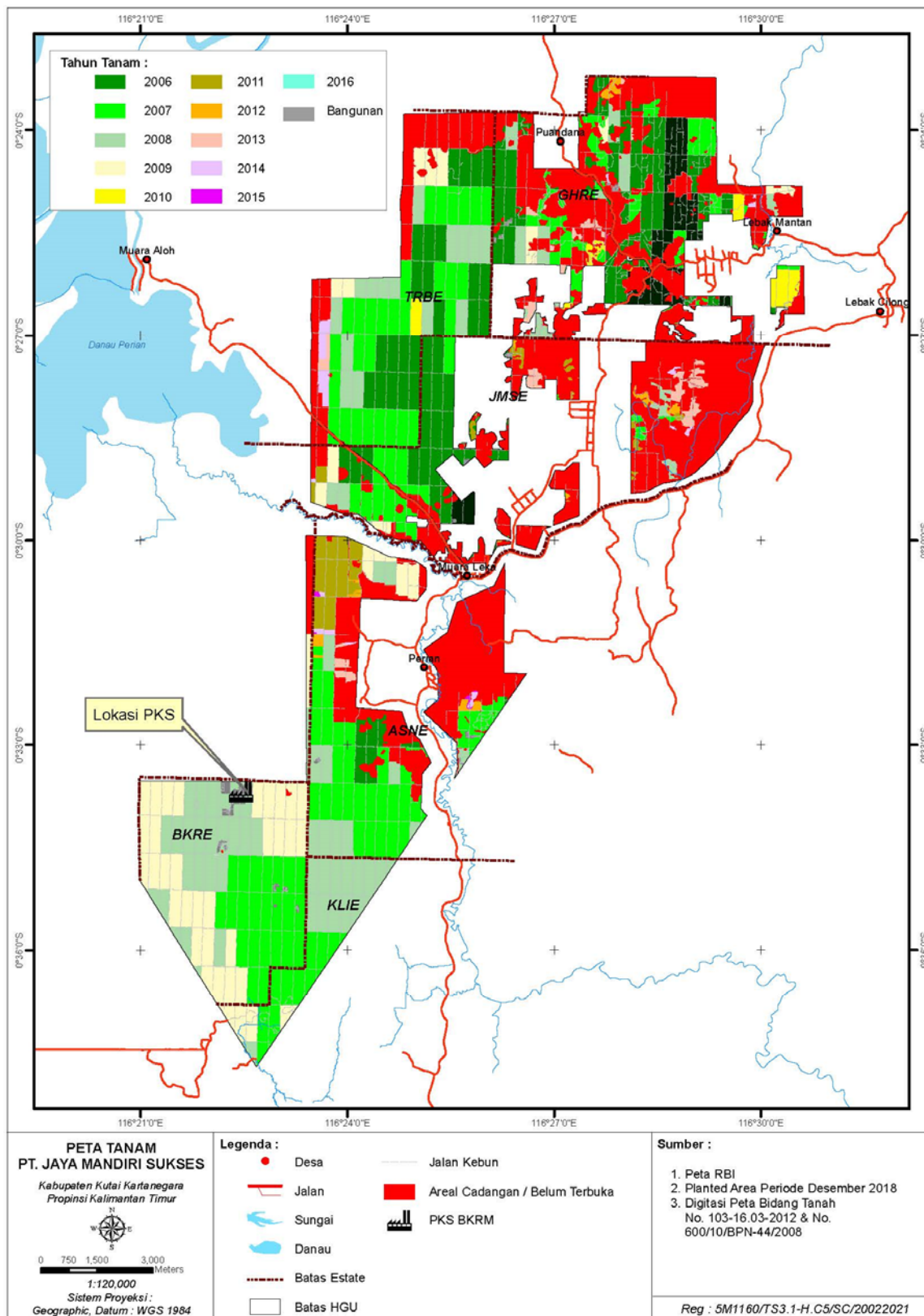


Figure 2. Operational Map of PT Jaya Mandiri Sukses



Abbreviations Used

ASNE	:	Angsana Estate
BHL	:	Buruh Harian Lepas / Contract worker
BKPM	:	<i>Badan Koordinasai Penanaman Modal</i>
BKRE	:	Bangkirai Estate
BOD	:	Biological of demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> / National Insurance
CEO	:	Chief Executive Officer
CITES	:	Convention on International Trade in Endangered Species of Wild Fauna and Flora
COD	:	Chemical of demand
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
EFB	:	Empty Fruit Bunches
EHP	:	Eagle High Plantation
EIA	:	Environment Impact Assessment
FFB	:	Fresh Fruit Bunch
FPIC	:	Free Prior Informed Consent
FR	:	Frequency Rate
GAPKI	:	<i>Gabungan Pengusaha Kelapa Sawit Indonesia</i>
GHG	:	Green House Gas
GHRE	:	Gaharu Estate
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i>
IPM	:	Integrated Pest Management
IUCN	:	International Union for Conservation of Nature
JMS	:	Jaya Mandiri Sukses
JMSE	:	Jatimas Estate
KER	:	Kernel Extraction Rate
KTP	:	<i>Kartu Tanda Penduduk</i> / Identity Card
LD50	:	Lethal Dosses 50
LUCA	:	Land Use Change Analysis
NPWP	:	<i>Nilai Pokok Wajib Pajak</i>
OER	:	Oil Extraction Rate
OFI	:	Opportunity For Improvement
OHS	:	Occupational Health & Safety
PIC	:	Person In Charge
PK	:	Palm Kernel
PKWT	:	Perjanjian Kerja Waktu Tertentu (Contract worker)
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
RKL-RPL	:	Environment management and Monitoring Plan
RSPO	:	Roundtable Sustainable Palm Oil
SCCS	:	Supply Chain Certification System
SIA	:	Social Impact Assessment
SKU	:	<i>Syarat Ketentuan Umum</i> / Permanent worker
SOP	:	Standart Operational Procedure
SR	:	Severity Rate
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none">RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th April 2020.	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT Jaya Mandiri Sukses – subsidiary of Eagle High Plantation Tbk.	
1.2.2	Contact person	Budi Tri Prasetya	
1.2.3	Organisation address and site address	RSPO registered company: Rajawali Place, 28 th Floor Jl. HR Rasuna Said Kav. B/4, Jakarta 12910	
1.2.4	Telephone	(+62-21) 8665 8828	
1.2.5	Fax	-	
1.2.6	E-mail	budi.prasetya@eaglehighplantations.com	
1.2.7	Web page address	http://www.eaglehighplantations.com/	
1.2.8	Management Representative who completed the application for certification	Budi Tri Prasetya	
1.2.9	Registered as RSPO member	1-0048-08-000-00 21 March 2008	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base Bangkirai Mill with FFB supplied from six (6) Estate Jatimas Estate, Gaharu Estate, Trembesi Estate, Angsana Estate, Bangkirai Estate, Kulim Estate	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			LatitudeLongitude
	Bangkirai Mill	Perian Village, Muara Muntai Sub District, Kutai Kartanegara Regency, Kalimantan Timur Province, Indonesia	S 00° 33' 39"E 116° 22' 26"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			LatitudeLongitude
	Jatimas	Muara Leka Village, Muara Muntai Sub District, Kutai Kartanegara Regency, Kalimantan Timur Province, Indonesia	S 00° 29' 42"E 116° 25' 33"
	Gaharu	Kayu Batu Village, Muara Leka Village, Muara Muntai Sub District, Kutai Kartanegara	S 00° 25' 05"E 116° 28' 42"

		Regency, Kalimantan Timur Province, Indonesia						
	Trembesi	Kayu Batu Village, Muara Leka Village, Muara Muntai Sub District, Kutai Kartanegara Regency, Kalimantan Timur Province, Indonesia	S 00° 25' 55"	E 116° 25' 25"				
	Angsana	Perian, Muara Muntai Sub District, Kutai Kartanegara Regency, Kalimantan Timur Province, Indonesia	S 00° 33' 18"	E 116° 25' 40"				
	Bangkirai	Perian, Muara Muntai Sub District, Kutai Kartanegara Regency, Kalimantan Timur Province, Indonesia	S 00° 35' 06"	E 116° 23' 06"				
	Kulim	Perian, Muara Muntai Sub District, Kutai Kartanegara Regency, Kalimantan Timur Province, Indonesia	S 00° 36' 34"	E 116° 24' 06"				
1.5	Description of Area Statement							
1.5.1	Tenure							
	• State		14,666.17 Ha					
	• Community		- Ha					
	<i>*The scope of certification is 13,312.16 Ha due to there are several areal overlapping with forest company</i>							
1.5.2	Area Statement							
	• Total area		13,312.16 Ha					
	• Mature area		9,518.16 Ha					
	• Immature area		- Ha					
	• Mill		15.00 Ha					
	• Road, Bridge, Building		471.00 Ha					
	• Occupation (community land)		2,192.00 Ha					
	• Area potensi tanam		196.00 Ha					
	• HCV		920.00 Ha					
	<i>*The total area of the HCV is 5,240 Ha, which is included in the planting area of 4,320 Ha.</i>							
1.6	Planting Year and Cycles							
1.6.1	Age profile of planting year							
	Planting Year	Hectarage (Ha)						
		Jatimas	Gaharu	Trembesi	Angsana	Bangkirai	Kulim	Total
	2005	41.62	308.34	-	-	-	-	349.96
	2006	483.21	725.84	687.42	108.44	-	-	2,004.91
	2007	318.01	331.58	865.71	800.85	674.39	257.95	3,248.49
	2008	75.68	162.61	398.06	281.50	600.33	363.76	1,881.94
	2009	61.65	51.60	109.69	90.20	850.00	91.11	1,254.25
	2010	-	109.74	29.63	-	-	-	139.37
	2011	62.00	-	-	239.30	-	-	301.30
	2012	25.37	21.02	-	28.59	-	-	74.98
	2013	84.38	45.22	15.44	26.90	-	-	171.94
	2014	11.03	6.19	48.69	18.74	-	-	84.65
	2015	-	1.90	-	4.47	-	-	6.37
	Total	1,162.95	1,764.04	2,154.64	1,598.99	2,124.72	712.82	9,518.16

1.6.2	New Planting area after January 2010 (without NPP Verification)				789.32 Ha		
1.6.3	Planting Cycle				1 st Cycle		
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO			
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Bangkirai	60	266,393.34	61,552.45	23.11	10,534.87	3.95
	<i>*Production data source from October 2021 –September 2022</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Jatimas	2,088.95	1,162.95	18,074.23	15.54	18,074.23	100
	Gaharu	3,272.04	1,764.04	24,708.96	14.01	24,708.96	100
	Trembesi	2,754.64	2,154.64	9,234.56	4.29	9,234.56	100
	Angsana	2,128.99	1,598.99	23,809.32	14.89	23,809.32	100
	Bangkirai	2,325.72	2,124.72	36,612.40	17.23	36,612.40	100
	Kulim	741.82	712.82	11,576.16	16.24	11,576.16	100
	TOTAL	13,312.16	9,518.16	124,015.63	13.03	124,015.63	100
	<i>*Production data source from October 2021 –September 2022</i>						
1.7.3	FFB description from other source						
	Name of sources/ Organisation	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Jatimas (Uncertified Area)	Subsidiary subsidiary of Eagle High Plantation Tbk.			4,917.44		
	Gaharu (Uncertified Area)	Subsidiary subsidiary of Eagle High Plantation Tbk.			2,204.98		
	Trembesi (Uncertified Area)	Subsidiary subsidiary of Eagle High Plantation Tbk.			336.30		
	Angsana (Uncertified Area)	Subsidiary subsidiary of Eagle High Plantation Tbk.			3,531.87		
	Bangkirai (Uncertified Area)	Subsidiary subsidiary of Eagle High Plantation Tbk.			375.36		
	Kulim (Uncertified Area)	Subsidiary subsidiary of Eagle High Plantation Tbk.			8,550.74		
	CDNE – Cendana Estate (Inti)	Subsidiary subsidiary of Eagle High Plantation Tbk.	-	-	24,484.1		
	SKIE – Sungkai Estate (Inti)	Subsidiary subsidiary of Eagle High Plantation Tbk.	-	-	1,633.2		
	DMRE – Damar Estate (Inti)	Subsidiary subsidiary of Eagle High Plantation Tbk.	-	-	401.1		
	ASNA – Angsana (Plasma)	Subsidiary subsidiary of Eagle High Plantation Tbk.	-	-	3,301.3		
	CDNA – Cendana	Subsidiary subsidiary of Eagle High	-	-	4,427.5		

(Plasma)	Plantation Tbk.			
GHRA – Gaharu (Plasma Tahap1)	Subsidiary subsidiary of Eagle High Plantation Tbk.	-	-	13,110.9
GHRP – Gaharu (Plasma Tahap 2)	Subsidiary subsidiary of Eagle High Plantation Tbk.	-	-	14.4
GHRs – Gaharu (Plasma Tahap 3)	Subsidiary subsidiary of Eagle High Plantation Tbk.	-	-	59.0
JMSA – Jatimas (Plasma Tahap 1)	Subsidiary subsidiary of Eagle High Plantation Tbk.	-	-	2,732.1
JMSP – Jatimas (Plasma Tahap 2)	Subsidiary subsidiary of Eagle High Plantation Tbk.	-	-	19.7
KLIA – Kulim (Plasma)	Subsidiary subsidiary of Eagle High Plantation Tbk.	-	-	11,293.5
REGR – Regar (External)	External Suppliers	-	-	23,035.5
PDUR – PT Delta Utama Resources (External)	External Suppliers	-	-	119.8
CATI – CV Antasari (External)	External Suppliers	-	-	3,319.8
PEAS - PT Enggang Alam Sawita (External)	External Suppliers	-	-	5.6
PWAU – PT Wong Akeh Utama (External)	External Suppliers	-	-	24,102.1
CVGP – CV Bumi Gatah Permai (External)		-	-	10,991.3
TOTAL				266,983.22

**Production data source from October 2021 –September 2022*

1.7.4	Product categories			FFB, CPO, PK	
1.8	Tonnage of Product				
1.8.1	Past Annual Claim Certified Product			Estimate Production (MT)	Actual Production (MT)
	FFB Processed			-	-
	CPO Production			-	-
	Palm Kernel (PK) Production			-	-
1.8.2	Product selling				
	Type of selling product			Actual selling product for last year (MT)	
	CSPO sold as RSPO certified product			-	
	CSPK sold as RSPO certified product			-	
	CSPO sold under another scheme			-	
	CSPK sold under another scheme			-	
	CSPO sold as conventional			-	
	CSPK sold as conventional			-	
1.8.3	Estimate of Certified FFB Claim				
	Name of Estates	Total Area	Planted Area	FFB	Yield

		(Ha)	(Ha)	(tonnes/year)	(tonnes/ha/year)			
	Jatimas	2,088.95	1,162.95	12,000	10.32			
	Gaharu	3,272.04	1,764.04	26,500	15.02			
	Trembesi	2,754.64	2,154.64	10,000	4.64			
	Angsana	2,128.99	1,598.99	22,000	13.76			
	Bangkirai	2,325.72	2,124.72	38,500	18.12			
	Kulim	741.82	712.82	11,000	15.43			
	TOTAL	13,312.16	9,518.16	120,000	12.61			
	<i>*Projected FFB production for 12 months of certificate</i> <i>*there are area subjected to sanctions due to new planting after January 2010 without NPP in Jatimas Estate Covering 182.78 Ha; Gahariu Estate 184.07 Ha; Trembesi Estate 93.76 Ha and Angsana Estate 318 ha</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		PK		Supply Chain Module
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	Bangkirai	60	120,000	29,000	24.17	5,400	4.50	MB
	<i>*Projected FFB production for 12 months of certificate</i> <i>*there are area subjected to sanctions due to new planting after January 2010 without NPP in Jatimas Estate Covering 182.78 Ha; Gahariu Estate 184.07 Ha; Trembesi Estate 93.76 Ha and Angsana Estate 318 ha</i>							
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			-				
	Others							
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status Mill		
	Mill	Time Bound Plan						
	EHP Mill (PT Eagle High Plantations)	2019	Arjuna Estate (BLP)	2019	Kotawaringin Barat, Kalimantan Tengah	Certified		
			Semeru (BLP)	2019				
			Bromo (BLP)	2019				
			BLP cadastral	2023		HGU Process		
			Arjuna Plasma	2023				
			Bromo Plasma	2023				

Bangkirai Mill (PT Jaya Mandiri Sukses)	2022	Bangkirai Estate (JMS)	2022	Kutai Kartanegara, Kalimantan Timur	Stage-1 audit
		Gaharu Estate (JMS)	2022		
		Kulim Estate (JMS)	2022		
		Angsana Estate (JMS)	2022		
		Trembesi Estate (JMS)	2022		
		Jatimas Estate (JMS)	2022		
		Cendana Estate (STP)	2023		LUCA process
		Sungkai Estate (MAJ)	2023		LUCA process
		Damar Estate (MAJ)	2023		LUCA process
		Kulim Estate (Location Permit)	2026		No HGU Yet
		Angsana Estate (Location Permit)	2026		No HGU Yet
		Angsana smallholder	2026		No HGU, LUCA not submitted yet
		Cendana smallholder	2026		LUCA not submitted yet
		Damar smallholder	2026		No HGU, LUCA not submitted yet
		Gaharu smallholder	2026		
		Jatimas smallholder	2026		
		Kulim smallholder	2026		
		Sungkai smallholder	2026		
BHL Mill (PT Bumihutani Lestari)	2023	Sibayak (BHL)	2023	Kotawaringin Timur and Katingan, Kalimantan Tengah	Postponed due to the pandemic, compensati on plan in- progress
		Rinjani (BHL)	2023		
		Kerinci (BHL)	2023		
		Sinabung (BHL)	2023		
		Bukit Raya (BHL)	2023		
		Papandayan (BHL)	2023		
		Rinjani Plasma (BHL)	2026		HGU Process
		Kerinci Plasma (BHL)	2026		HGU Process
ADS Mill	2023	Pangrango (ADS)	2024	Kotawaringin Timur,	LUCA

(PT Adhyaksa Dhamasatya)				Kalimantan Tengah	process
		Merbabu (ADS)	2024		LUCA process
Kelampai Mill (PT Arrtu Plantation)		Padang Bunga (APN)	2024	Ketapang – Kalimantan Barat	LUCA process
		Energie Pawan (AER)	2024		LUCA process
		Siantau (ABP)	2024		LUCA process
		Pelanjau (AAN)	2024		LUCA process
		Nusantara Jaya (AAN)	2024		LUCA process
		Agro Jaya (AAN)	2024		LUCA process
		Mahota (MKJ)	2024	Kotabaru, Kalimantan Selatan	LUCA process
		Bidara (MKJ)	2024		LUCA process
		Intan (STP)	2025		LUCA process
		Merah Delima (STP)	2025		LUCA process
Batu Bulan Mill (PT Suryabumi Tunggal Perkasa)	2023	Berlian (JMS)	2025	Tanah Bumbu, Kalimantan Selatan	LUCA process
		Kualam (JMS)	2025		LUCA process
		Batu Bulan (SGA)	2026		LUCA process
		Topas (SGA)	2025		LUCA process
		Emerald (SGA)	2025		LUCA process
		Batu Bulan Smallholder	2026	Tanah Bumbu, Kalimantan Selatan	
		Intan Smallholder	2026	Kotabaru, Kalimantan Selatan	
		Berlian Smallholder	2026	Kotabaru, Kalimantan Selatan	
		Topaz Smallholder	2026	Tanah Bumbu, Kalimantan Selatan	
		Pualam Smallholder	2026	Tanah Bumbu, Kalimantan Selatan	
Safir Mill (PT Pesona Lintas)	2023	Safir Estate (PLS)	2026	Kotabaru, Kalimantan Selatan	LUCA process

1.10.2	Surasejati)		Mutiara (SKS)	2026		LUCA process
			Kalimaya (KAPAG)	2026		LUCA process
			Permata (MAJ)	2026		LUCA process
	Tulip Mill (PT Tandan Sawita Papua)	2023	Anggrek (TSP)	2026	Keerom, Papua	
			Dahlia (TSP)	2026		
			Rafflesia (TSP)	2026		
			Tulip (TSP)	2026		
			Aggrek Plasma (TSP)	2026		
	No mill yet		Dahlia Smallholder	2026		
	No mill yet		Anggrek Smallholder	2026		
	No mill yet		Batanghari Estate	2026	Solok selatan, Sumatera Barat	
	No mill yet		Pinoh Estate	2026	Melawi, Kalimantan Barat	
	No mill yet		Pinoh Smallholder	2026		
	No mill yet		Bukit Rampin Estate	2026	Sekadau, Kalimantan Barat	
	No mill yet		Merpati Estate	2026	Sorong, Papua	
	No mill yet		Murai Estate	2026	Sorong, Papua	
*TBP revised on October 2022						
The revised TBP has reported to RSPO by email on 10 October 2022 and has approved by RSPO on 15 November 2022.						
Progress of Associated Smallholders and Outgrowers for Certifiable Standard						
As described in the TBP scheme smallholder plan to be certified in 2026.						

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
IC	<p>1. Rizliani Aprianita Hasibuan (Lead Auditor). 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.</p> <p>2. Asystasha Aishah Silalahi (Auditor). Indonesia Citizen, Bachelor of Economy, Major of Agribusiness, Faculty of Economic and Management. She has one year experience in consultancy. She has followed training such as ISPO Auditor Training, Lead Auditor ISO 9001:2015, OHS General Expert, RSPO lead auditor training course, SCCS, and several in house training related to environmental, BMP, SA 8000. Has been involved in several audit activities since 2016 related to sustainable palm oil certification covering waste management aspect, Social Aspect, Health and Safety Aspect, and Worker Welfare. During this audit, she verified legal, land dispute, and SCCS aspect</p> <p>3. Radytio Puspanjana (Auditor). 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 GMT, 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 audit 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.</p> <p>4. Darwin Simatupang (Auditor Trainee). Indonesian citizen. Bachelor of Agriculture, majoring in Soil Science and Land Resource from IPB University. Has one year experience as agronomist in palm oil plantation company. Training has been attended including Indonesian Sustainable Palm Oil (ISPO), Lead Auditor of ISO 9001: 2015, Awareness ISO 17021: 2015, Awareness ISO 17065: 2012, Awareness ISO 14001: 2015, Awareness ISO 45001: 2018, Awareness ISO 19011: 2018. During this assessment has verified Best Management Practices and Occupational Health and Safety supervised by Lead Auditor.</p> <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
IC	<p>Number of auditors: 3 auditor and 1 auditor trainee</p> <p>Number of days for Onsite Assessment at site: 5 days</p> <p>Number of working days for Onsite Assessment at site : 15 Working days</p>
2.2.2	Assessment Process
IC	<p>The assessment was conducted by measuring the sufficiency of implementation done by the PT Jaya Mandiri Sukses to the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard Endorsed by the RSPO Board of Governors on 12 November 2020.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Some opportunities for improvement of the results IA delivered by the MUTU auditor to the management unit and the</p>

results are the subject will be verified at the next assessment phase (ASA-1).

The opening meeting was held on 14 November 2022. As for the participants who attended the opening meeting included the Regional Controller, Estate and Mill Managers, Support Team from Jakarta and other staff of PT JMS. Closing meeting was held on 18 November 2022 attended by the same participants as the opening meeting. Management PT Jaya Mandiri Sukses accept all the IC audit results.

The assessment program please find Appendix 2.

2.2.3	Locations of Assessment
IC	<p>The sampling location consider the issue arise from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>Bangkirai Mill</p> <ul style="list-style-type: none"> • Security post. Observations and interviews related to duties and responsibilities, aspects of employment, FFB suppliers, OSH implementation, and emergency response. • Weighbridge. Observations and interviews related to duties and responsibilities, aspects of employment, FFB suppliers and supply chain. • Grading. Observations and interviews related to work procedures, employment, complaint mechanisms and OHS aspects. • Sterilizer Station. Observations and interviews related work procedure, safety aspect, worker welfare etc. • Engine Room. Observations and interviews related work procedure, safety aspect, worker welfare etc. • Boiler Station. Observations and interviews related work procedure, safety aspect, worker welfare etc. • Kernel Station. Observations and interviews related work procedure, safety aspect, worker welfare etc. • CPO 13enstrua station. Interview with 1 worker related to work procedure, worker welfare, OHS implementation in mill, and supply chain aspect. • Workshop. Observation and interview to store keeper related to OHS, waste management and worker welfare aspect. • Chemical warehouse. Observations and interviews regarding storage conditions, agrochemical stocks, OHS implementation and work procedures. • Central warehouse and PPE stock storage. Observations and interviews regarding work procedures, material storage and PPE stock. • Mill Drainage. Observations mill effluent lines, sanitation mill and flow of leaching mill. • Solid Waste. Observation of the management of Solid waste consist of EFB, fiber and shell from the production process of mill. • WWTP. Field observations related to Ban to entry to WWTP, run off, testing of effluent. <p>Bangkirai Estate</p> <ul style="list-style-type: none"> • HGU stakes and land demarcation No. 75, No. 76, No. 77 and No. 78. Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency. • HCV Forest Area, Block T51. Observation the implementation of management in HCV of forest area. • HCV Reservoir Area, Block U40 division II. Observation the implementation of management in HCV of water source. • Harvesting activity, Div 3 Block Y44. Observation and interview with workers related to Procedure implementation, OHS implementation, workers welfare, wages and complaint mechanism. • Circle and Path Spraying activity, Div 2 Block W44. Observation and interview with workers related to Procedure implementation, OHS implementation, workers welfare, chemical handling and complaint mechanism. • Manuring activity, Div 3 Block X43. Observation and interview with workers related to Procedure implementation OSH implementation, workers welfare, wages and complaint mechanism. • Selective weeding activity, Div 2 Block U39. Observation and interview with workers related to Procedure

implementation OSH implementation, workers welfare, wages and complaint mechanism.

- **Road Maintenance, Div 2 Block U44.** Observation and interview with workers related to Procedure implementation, OHS implementation, workers welfare, wages and complaint mechanism.
- **Barn Owl, Div 2 Block U44.** Integrated Pest Management observation.
- **Central warehouse and PPE stock storage.** Observations and interviews regarding work procedures, material storage and PPE stock.
- **Chemical warehouse.** Observations and interviews regarding storage conditions, agrochemical stocks, implementation of OHS and work procedures.
- **Fertilizer warehouse.** Observations and interviews regarding storage conditions, fertilizer stocks, and OHS implementation.
- **Hazardous waste warehouse.** Observations and interviews regarding storage conditions, hazardous waste stocks, emergency response facilities, and waste management.
- **Workshop.** Observations and interviews related to work procedures, employment and OSH implementation.
- **Clinic.** Observations and interviews related to health facilities for workers and medical waste management.
- **Rinse house and storage area for PPE spray & fertilizer.** Observations and interviews related to OHS and environmental aspects.
- **Daycare facilities.** Observations and interviews about workers' welfare, gender committees, and facilities for workers.
- **Central housing.** Observations and interviews regarding the facilities provided by the company, domestic waste management and employment.
- **Workshop.** Observations and interviews with workers related to the management and implementation of health safety, and social worker.
- **Daycare.** Observation and interview with worker related labor aspect and OHS.
- **Diesel Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Fertilizer warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Oil and Agrochemicals Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Hazardous Waste Warehouse (Temporary).** Field observations related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse, wages and complaint mechanism.
- **Generator (Electricity).** Observation for waste management, and interviews related to workers facility, electricity, domestic waste, sources offresh water, socialization of company policy and complaint mechanism.
- **Sparepart and PPE warehouse.** Observation minimum stock of PPE's.
- **Land Application Block W38.** Observations related to implementation management procedures of POME for land application.

Angsana Estate

- **HGU stakes and land demarcation No. 29, No. 42, No. 43 and No. 44.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **Harvesting activity, Div 2 Block T50/51.** Observation and interview with workers related to Procedure implementation, OHS implementation, workers welfare, wages and complaint mechanism.
- **Circle and Path Spraying activity, Div 2 Block T50/51.** Observation and interview with workers related to Procedure implementation, OHS implementation, workers welfare, chemical handling and complaint mechanism.
- **Manuring activity, Div 2 Block T51/52.** Observation and interview with workers related to Procedure implementation OSH implementation, workers welfare, wages and complaint mechanism.
- **Central warehouse and PPE stock storage.** Observations and interviews regarding work procedures, material storage and PPE stock.
- **Chemical warehouse.** Observations and interviews regarding storage conditions, agrochemical stocks, implementation of OHS and work procedures.
- **Fertilizer warehouse.** Observations and interviews regarding storage conditions, fertilizer stocks, and OHS implementation.

- **Rinse house and storage area for PPE spray & fertilizer.** Observations and interviews related to OHS and environmental aspects.
- **Housing division 1.** Observations and interviews regarding the facilities provided by the company, domestic waste management and employment.
- **Fire control facilities and infrastructure.** Observation of conditions and simulations related to land fire emergency response.
- **Oil/fuel storage.** Observation on storage conditions, MSDS, implementation of OHS and emergency facilities.
- **Housing Complex Pondok Hijau division 1.** Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.
- **Domestic Waste Landfill, Block S26 division I.** Observation on domestic waste management.

Gaharu Estate

- **HGU stakes and land demarcation No. 46, No. 47, No. 48 and No. 45.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HCV riparian Area, Block H8.** Observation the implementation of management in HCV of Kendang Renik riparian river.
- **Peat management, Div 2 Block H63/62.** Observation related to peat management (subsidence pole, piezometer and water level).
- **Workshop.** Observations and interviews with workers related to the management and implementation of health safety, and social worker.
- **Daycare.** Observation and interview with worker related labor aspect and OHS.
- **Diesel Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Fertilizer warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Oil and Agrochemicals Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Hazardous Waste Warehouse (transite).** Field observations related to the fulfillment of the attribute's health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse, wages and complaint mechanism.
- **Generator (Electricity).** Observation for waste management, and interviews related to workers facility, electricity, domestic waste, sources offresh water, socialization of company policy and complaint mechanism.
- **Sparepart and PPE warehouse.** Observation minimum stock of PPE's.
- **Fire Fighting Equipment Storage and fire tower.** Simulation the function of fire extinguishers and team readiness.
- **Body shower of spraying team and mixing area.** Observation the conditions body shower room and PPE handling.
- **Workshop.** Observations and interviews with workers related to the management and implementation of health safety, and social worker.
- **Daycare.** Observation and interview with worker related labor aspect and OHS.
- **Diesel Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Fertilizer warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Oil and Agrochemicals Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Hazardous Waste Warehouse (transite).** Field observations related to the fulfillment of the attribute's health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse, wages and complaint mechanism.
- **Generator (Electricity).** Observation for waste management, and interviews related to workers facility, electricity, domestic waste, sources offresh water, socialization of company policy and complaint mechanism.
- **Sparepart and PPE warehouse.** Observation minimum stock of PPE's.
- **Fire Fighting Equipment Storage and fire tower.** Simulation the function of fire extinguishers and team readiness.

	<ul style="list-style-type: none"> • Body shower of spraying team and mixing area. Observation the conditions body shower room and PPE handling. <p>Jatimas Estate</p> <ul style="list-style-type: none"> • Harvesting activity, Div 1 Block M58. Observation and interview with workers related to Procedure implementation, OHS implementation, workers welfare, wages and complaint mechanism. • Circle and Path Spraying activity, Div1 Block L57. Observation and interview with workers related to Procedure implementation, OHS implementation, workers welfare, chemical handling and complaint mechanism. • Manuring activity, Div 3 Block J75. Observation and interview with workers related to Procedure implementation OSH implementation, workers welfare, wages and complaint mechanism. • Road Maintenance, Div 1 Block M56. Observation and interview with workers related to Procedure implementation, OHS implementation, workers welfare, wages and complaint mechanism. • Empty Bunch Application, Div 1 Block M55. Observation and interview with workers related to Procedure implementation OSH implementation, workers welfare, wages and complaint mechanism. • Housing Complex Division 2. Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
IC	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Jaya Mandiri Sukses was held by:</p> <ul style="list-style-type: none"> • Public Notification on website PT Mutuagung Lestari and RSPO Website on 14 October 2022 • Public consultation with NGOs (by email) such as WALHI, WWF, AMAN and Sawit Watch on November 9, 2022 • Public consultation meeting with government institution on November 15, 2022 • Public consultation meeting with community(s) including previous land owner on November 15, 2022 • Public consultation meeting with internal stakeholders and contractor on November 15, 2022 <p>Numbers of input from stakeholders were clarified by PT Jaya Mandiri Sukses</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next assessment (ASA-1) will be conducted eight (8) months to twelve (12) months after date of annual license.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Bangkirai POM – PT Jaya Mandiri Sukses, subsidiary of Eagle High Plantations Tbk. Operation consisting of one (1) mill and six (6) oil palm estates.

During the assessment, there were eleven (11) Nonconformities were assigned against Major Compliance Indicators; eleven (11) nonconformities were assigned against Minor Compliance Indicators and two (2) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective action(s) that had been reviewed and accepted by Auditor(s) in form of documentation evidence(s) e.g. (document record/photographic/etc).

MUTUAGUNG LESTARI found that Bangkirai POM – PT Jaya Mandiri Sukses, subsidiary of Eagle High Plantations Tbk. Complied with the requirements of *Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard Endorsed by the RSPO Board of Governors on 12 November 2020.*

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is *Issued*

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1	The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1	<p>Company has procedure for Request and Information Response No. SOP-OTH-F3-020 version 4.0 date 10 January 2019. The procedure explains the mechanism for communication and consultation with stakeholder. This document also determines the management's document that can be accessed publicly or not. The public document, among others:</p> <ul style="list-style-type: none"> - Environment Permit - Annual report - Company policy and procedure - Legal permit, such as cultivation rights and others permit - Operational map - HCV Report and HCV Management Plan - Social Impact Assessment report - Employee data - And others. <p>Based on interview with surrounding village, previous land owner, and related government agencies, it is known that stakeholders can access those document in accordance with the company procedure.</p>	
1.1.2	The company has submitted management information to interested parties, including periodic and mandatory types of	

information provision, such as *RKL-RPL* reports (every semester), Mandatory manpower reports (once a year), *LKUP* (every semester), *LKPM* (every semester), OSH Committee report (every quarter), in example: Land use report for the 1st semester of 2022 submitted to Land National Office of Kutai Kartanegara Regency on 14 September 2022.

- Plantation activity progress report for the 1st semester of 2022 submitted to Plantation Agency of Kutai Kartanegara Regency and Kalimantan Timur Province on 14 September 2022.
- Investment activity report for the third quarter of 2022 which was reported online to the Ministry of Investment/BKPM on 10 October 2022.

Based on interview with related agency in Kutai Kartanegara Regency, it is known that company has submitted the mandatory report periodically and the information is presented in an appropriate manner and can be accessed by the relevant stakeholders.

1.1.3

The company records requests for information from stakeholders in documents of Incoming and Outgoing Letters of External Stakeholders. The book informs about the date of the incoming letter, subject matter, and the date of the letter's response. Based on the review of these documents, incoming letters from stakeholders related to requests for assistance or submission of proposals. Then, the company shows examples of responses to incoming mail, for example:

- Incoming letter from Perian Village regarding request for funding assistance July 26, 2022. The company showed a letter of approval for the application.
- Incoming letter from Muara Leka Village regarding request funding assistance for Dayak Belian Ngelongan dated 31 January 2022. The company showed a letter of approval for the application submitted on 31 January 2022.

Based on interviews with representatives of Perian Village, it is known that the company has conducted outreach to the village regarding the mechanism for requesting information from the company. If there is a request for information, the village will send a letter to the company and the company will respond.

1.1.4

Company has procedure for Request and Information Response No. SOP-OTH-F3-020 version 4.0 date 10 January 2019. The procedure explain the mechanism for communication and consultation with stakeholder. Based on interview with representative of Muara Leka Village, Lebak Mantan Village, and Perian Village, it is known that they understand the mechanism for consultation and communication with company. The consultation and communication can be done verbally or write and submit letter to company.

1.1.5

The company has a list of stakeholders that explains the names of stakeholders, positions, names of persons in charge, and addresses of stakeholders. The list includes related offices in Kutai Kartanegaran Regency, police offices, sub-district offices, village offices, plasma cooperatives, as well as contractors for plantations and factories. The entire list of stakeholders can be contacted, this is in accordance with the results of public consultations with several government representatives in Kutai Kartanegara Regency, however From the list, it is known that there are 36 contractors working with PT JMS. The company still needs to complete the stakeholder list, for example the hazardous waste transport contractor. (OFI)

Status: Comply

1.2

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

1.2.1

The company showed the 2018 code of ethics standards which were approved by the Chief Executive Officer (23 October 2017) and became effective on 6 December 2017. EHP group is committed to implementing high ethical standards for the Board of Commissioners, Directors & Management, Employees, Customers, Suppliers; Consumer; Governments & Communities in the environment where the EHP Group operates and understand the important principles of doing business which are used as guidelines in maintaining and building the reputation of the EHP Group as a business partner, employer, supplier and part of a responsible and trustworthy corporation. The policies presented included; Compliance with laws, regulations & company policies; ethical business conduct & reasonable relationships; conflict of interest; health, safety & environment; company property & assets; job performance; Human rights and political activity. Implementation

of the code of ethics such as violation of the code of ethics; violation reporting; compliance statement & communication & consultation.

The company shows documentation of the dissemination of the code of ethics, for example the Minutes of Dissemination of the Company's Code of Ethics and Forced Labor and Slavery Policies to the Agung Baya Cooperative in Perian Village which was held on 3 May 2021.

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

Thus, it is concluded that the company has owned and declared an honest and corruption-free business code of ethics that has been socialized to the public.

1.2.2

The company has a system to monitor compliance and implementation of these policies, as well as ethical business practices, namely SOP – OTH – F3 – 019 Version 2.0 about Complaint Handling which has been in effect since January 10, 2019. The procedure describes several types of complaints, including:

- Employment complaints
- Non-work complaints
- Community complaints
- Customer complaints
- Another complaint.

This SOP also explains that the company guarantees the confidentiality of the reporter or the reporter. Based on the results of interviews with management and stakeholder, there is no evidence of violations of the company's ethical behavior practices.

In addition, to monitor compliance and implementation of policies related to the code of ethics, the company also conducted an internal audit related to the implementation of the RSPO principles and criteria which was carried out April 25-29 2022. From the results of the internal audit it was also known that there was no violation of the company's code of ethics.

	Status: Comply	
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PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

2.1

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

2.1.1

The unit of certifications can presented several evidence of compliance to applicable regulations in example:

Environmental Aspect

The company Unit has shown compliance with laws and regulations, for example:

- Has been implements the requirement of environment aspect such as EIA management and monitoring in routinely (refer to criteria 3.4).
- Has been manage the hazardous waste and domestic waste in accordance with applicable regulation (refer to criteria 7.3).
- Land preparation without burning and has the infrastructure in fire anticipation, according to *Permentan* Number. 26 of 2007 section 15. (Refer to criteria 7.11).
- Has been implements the requirement of POME to land application accordance with applicable regulation (refer to criteria 7.8).
- The company already has a permit to utilize wastewater to the ground for application to soil in accordance with the Decree of Regent of Kutai Kartanegara number 660.1/80/B-II/BLHD/2015 on June 8, 2015 (no validity period) as long as there is no change in operational activities the permit is still valid. Based on the results of interviews with the Kutai

Kartanegara Regency Environmental Service, information was obtained that the company already has a license to utilize POME on land (land application) and is still valid if there is no change in operational activities.

- The company already has environmental documents in the form of AMDAL year 2007 covering an area of 21,000 hectares (scope location permit) for core estate and smallholders. The AMDAL document was ratified by the Kutai Kartanegara Regency AMDAL document Assessment Commission with Number: KAKK/09/AMDAL/PERKEBUNAN/2007 dated 18 June 2007.
- The Environmental Impact Analysis/AMDAL (ANDAL, RKL, RPL) Activities of the POM and the composting Plant PT. Jaya Mandiri Sukses with a capacity of 60 Tons of FFB/Hour with a scope based on a Location Permit for Palm Oil Processing and composting station activities covering an area of 14.9 Ha (Decree of the Regent of Kutai Kartanegara No. 590/525.29/002/A.Ptn. In the Perian Village area, Muara Muntai District. The AMDAL document was ratified by the Regional Environmental Agency (BLHD) of Kutai Kartanegara Regency with Number: KAKK/27/AMDAL/PABRIK-KOMPOSTING/X/2010 dated 28 October 2010.
- Hazardous and Toxic Waste Management Permit for PT JMS Bangkirai Estate based on the Decree of the Kutai Kartanegara Regent Number Nomor: 660.4/066/TPS-LB3/DPMTSP dated 21 May 2018 which is valid for 5 years from the date of stipulation.
- Hazardous and Toxic Waste Management Permit for PT JMS Jatimas Estate based on the Decree of the Kutai Kartanegara Regent Number Nomor: 660.4/067/TPS-LB3/DPMTSP dated 21 May 2018 which is valid for 5 years from the date of stipulation.
- The company has a water resource exploitation permit for Bangkirai POM issued by the Ministry of Public Works and People's Enterprises based on decision letter number 245.8/KPTS/M/2018 dated 19 March 2018 which is valid for 5 years.

Employment

The determination of wages at Unit certification is based on the minimum wage in Kutai Kartanegara District based on the Decree of the Governor of Kalimantan Timur No. 561/K.598/202 on November 30, 2021. The Minimum Wage for Kutai Kartanegara District in 2022 is Rp. 3,199,654.80. Related to this, the company has Memo No. 083/654/HC-UM/JMS/I/2022 dated January, 3 2022 regarding wages of daily worker and Memo No. 095/666/HC-UM/JMS/I/2022 dated January, 3 2022 regarding wages of permanent workers.

However regarding compliance of applicable regulations, the company was unable to demonstrated regarding compliance to several regulations ie

1. Wage Scale

- PT JMS 2022 Wage Scale which is set for January 3, 2022. In this wage scale it is known that the lowest wage is in grade G with a wage of Rp. 3,199,654 and the highest grade is grade A with a salary of Rp. 4,979,654.
- The results of interviews with the PIC obtained information that for SKU employees (permanent employees), the criteria for grades are based on years of work.
- The results of verification of the September 2022 payroll document obtained information that the employee's working period is 11 years and 4 months. The wages earned in October 2022 are Rp. 3,199,654.80 (minimum wage).

2. Absence of BHL (daily worker)

- The results of interviews with BHL workers in workshops, harvesting activities, spraying, fertilizers at JMSE, GHRE, BKRE, ASNE show that there are BHL workers with a working period of over 1 year to 7 years. In addition, the results of interviews obtained information that workers work every Monday-Saturday.
- The results of verification of attendance documents for BHL workers for example at the Day Care at BKRE in August – October 2022, it was found that the worker had worked more than 21 working days for 3 consecutive months.

3. compliance with regulations related to operator licenses

- Boiler operator
 - Based on site visits and interviews with workers in sterilizer station, it is known that there are 6 sterilizer units with a capacity of 30 tons/hour.
 - Based on site visits and interviews with workers in Boilers station, it is known that Mill has boilers (steamers) with a capacity of 40 tons/hour in the amount of 2 units.
 - From the list of operators license, it is known that there are 2 employees who have attended class I steam

- aircraft training for boiler stations and there are no sterilizer operators who have operators license.
- *Permenaker* No. 01 of 1988, in Appendix 1 it is explained that for a steam boiler capacity >40 T/h - <60 T/h requires 1 class I operator and 1 class II operator for each shift.
- Based on the Mill employee list, it is known that there are a total of 6 employees in charge of operating boiler machines which are divided into 2 work shifts (3 people/shift), so there should be 2 class I steam aircraft operators and 2 class II aircraft operators.
- Power and Production Aircraft Operators
 - *Permenaker* No. 38 of 2016 in Articles 110, 111 and Table E it is explained that for prime movers with power > 214.47 HP or 200 kVa must have power and production aircraft operators on each shift.
 - Based on field visits and interviews with mill workers, it is known that mill has 3 generators with a capacity of 320kVa, a total of 2 units with operating status and 240 kVa with operating status which are operated by the operator with a change of 3 shifts.
 - Based on the results of the review of the list of operators license documents, it is known that there are no operators who have an operators license, for power and production aircraft.
- Welder Operator
 - *Permenaker* No. 2 of 1982 in article 32 states "Management is obliged to carry out and be responsible for the compliance with this Ministerial Regulation".
 - Based on field visits and interviews at the Bangkirai Estate workshop, it is known that currently the welding work at the workshop is carried out by a worker with the initials IWN.
 - The company shows a list of employees who have received an operator license for a welder, but cannot show an operator license for a welder operator with the initials IWN.

There is not enough evidence yet, that:

1. The company has implemented a wage scale according to the stipulated wage scale.
2. Casual Daily Workers who have worked 21 working days or more for 3 consecutive months or more have been appointed as permanent worker.
3. Sufficient number of licensed operators in accordance with regulations.

Based on that's explanations its became non conformity No 2022.01 with major category

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. The regulations cover aspects of agribusiness, employment, environment, and other regulations related to the company operational activities last update on 3 November 2022 i.e:

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

Evaluation of law registers for contractors, such as PR Sumber Agung Srimarti (hazardous waste transportation) which have been implemented on 21 February 2022. Explanation on contractor compliance 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 by March 2022.

2.1.3

Company has the mechanism to maintain the operational boundary written in SOP for Boundary Monitoring and Maintenance No. SOP-TS-001 Version 1 date 3 December 2018. The procedure explain that monitoring and maintenance of boundary poles conducted once a year. 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. The auditor done field observations at poles for each estate, such as No. 29, 42, 43, and 44 in Angsana Estate and No. 75,76,77,78 in Bangkirai

Estate it is known that HGU boundaries are maintained and clearly visible and no indications of cases of boundary violations or excess planting.

Based on the results of consultations with representatives of the people of Perian Village dan Lebak Mantan Village and Muara Leka Village, information was obtained that there were no indications of cases of boundary violations or excess planting.

2.1.1 Status: NC No. 2022.01 with Major Category

2.2

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

2.2.1

The company shows a list of contractors contained in the Stakeholder List document which contains information regarding the name of the stakeholder, title, name of person in charge, and address of stakeholder. From the list, it is known that there are 36 contractors working with PT JMS.

2.2.2

The company shows several work agreements with third parties, such as:

- Agreement No. 051/09/2022/Lokal-JMS JMSE-Muat TBS ADD1 on November 1, 2022 for FFB loading work
- Agreement No. 0052/JMS-TRBE/IX/2022 – Addendum Tunas Pokok on November 10, 2022 for pruning work
- Agreement No. 0076/X/2022/Lokal-JMS TRBE/sewa excavator on November 10, 2022 for excavator rental work
- Agreement No. 0075/X/2022/Lokal-JMS TRBE/Sewa grader on November 10, 2022 for grader rental work
- Agreement No. 063/10/2022/local-JMS JMSE/Prunning on November 1, 2022 for pruning work.

In the agreement mentioned above, it has been explained that contractors are required to comply with labor, environmental, legal regulations including meeting minimum wages, prohibiting the use of child labor, forced labor, involving employees in the BPJS program, providing PPE and others.

In addition, the company shows agreement with FFB suppliers, for example agreement No. 004/JMS-CV Bumi Gatah Permai/TBS/IV/2022 dated 29 April 2022. And there is no clause regarding fulfillment of relevant legal obligations.

Based on the explanation above, it is concluded that there is not yet sufficient evidence that agreements with FFB suppliers have separate clauses regarding the fulfillment of relevant legal obligations. In addition, the fulfillment of relevant legal obligations cannot be proven by third parties, both contractors and FFB suppliers. **Based on that's explanations its became non conformity No 2022.02 with Minor category**

2.2.3

The company shows several work agreements with third parties, such as:

- Agreement No. 051/09/2022/Lokal-JMS JMSE-Muat TBS ADD1 on November 1, 2022 for FFB loading work
- Agreement No. 0052/JMS-TRBE/IX/2022 – Addendum Tunas Pokok on November 10, 2022 for pruning work
- Agreement No. 0076/X/2022/Lokal-JMS TRBE/sewa excavator on November 10, 2022 for excavator rental work
- Agreement No. 0075/X/2022/Lokal-JMS TRBE/Sewa grader on November 10, 2022 for grader rental work
- Agreement No. 063/10/2022/local-JMS JMSE/Prunning on November 1, 2022 for pruning work.

In the agreement mentioned above, it has been explained that contractors are required to comply with labor, environmental, legal regulations including meeting minimum wages, prohibiting the use of child labor, forced labor, involving employees in the BPJS program, providing PPE and others.

In addition, the company shows agreement with FFB suppliers, for example agreement No. 004/JMS-CV Bumi Gatah Permai/TBS/IV/2022 dated 29 April 2022. However, there is no clause regarding the prohibition of practices involving child labour, forced labour, and workers from human trafficking.

Based on the explanation above, it is concluded that there is not enough evidence yet that the agreement with the FFB

supplier has a clause regarding the prohibition of practices involving child labor, forced labor, and workers from human trafficking. **Based on that's explanations its became non conformity No 2022.01 with minor category**

2.2.2 Status: NC No. 2022.02 with Minor Category

2.2.3 Status: NC No. 2022.03 with Minor Category

2.3

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

2.3.1

Based on the list of internal and external FFB suppliers, it is known that the company receives FFB from direct suppliers, including plasma cooperatives Leka Mandiri, Keham Lestari, and Agung Baya. The company then showed examples of parcel maps of members of the Leka Mandiri Cooperative. The company has also indicated the coordinates for the four cooperatives. In addition, there is also a sample document for the business entity permit for the Agung Baya Cooperative based on the Deed of Establishment of the Agung Baya Palm Oil Cooperative which was approved by the State Minister for Cooperatives and Small and Medium Enterprises in accordance with Decree No. 500/34/BH-01/IV/2006 dated 18 April 2006.

However, the company has not shown proof of the land ownership status of the plasma cooperative. **Based on that's explanations its became non conformity No 2022.04 with major category**

2.3.2

Based on list of FFB supplier, Bangkirai Mill also received FFB from indirect supplier. There are 3 indirect supplier, namely CV Regar, PT BGP, and PT WAU. Company also has identify geolocation of some supplier farmer and the status of land legality. For example, farmers from PT BPG identified has 27 farmers along with the coordinate of each farmers. The land legality of the farmers is certificate of land and certificate of ownership. However, the company could not showed the proof of land legality and valid business license. Therefore, the Company has the opportunity to complete proof of land ownership status from the growers/farmers and valid trade permits. (OFI)

2.3.1 Status: Nonconformity No. 2022.04 with Major Category

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

3.1

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

3.1.1

The company shows long-term planning documents in the 5 (five) year planning, which are listed in the 5 Annual Work Plan – JMS 2018 – 2022 document. The document explains, among other things FFB Production, FFB Sales, FFB Purchase – related party, FFB Process, OER, KER, CPO Production, PK Production, Selling quantity (FFB, CPO, PK dalam ton), Selling price (FFB, CPO, PK dalam Rp.), Revenue, incoming cash, Cost Of Good Sold (FFB purchase, mature upkeep, harvesting cost, transport cost, overhead cost, Depreciation cost), dan Net Profit.

The company's annual report is available in the Management Review Meeting which informs the discussion on the achievement of annual performance from monthly Plantation production and others. Evaluation of the achievement of the current year's budget has been carried out at the end of each year, as a material consideration in the preparation of the next year's budget.

3.1.2

Based on the results of field visits and document studies, it is known that the oldest plant age was in 2006 and has not yet entered the replanting age, so the company does not have a replanting plan for the next 5 years.

3.1.3

Management review towards plantation and operational activities had consistently conducted by the unit of certification periodically, as presented in several documents, for example as follows:

- Monthly Mill Manager Report.
- Monthly Estate Manager Report.

- Sustainability Internal Audit Report for RSPO period 2022. The audit is conducted on April 25-29, 2022.
- Internal Audit Operation. The audit is conducted on May 2022.

	Status: Comply	
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.		
3.2.1 <p>The certification unit already has a system to improve existing practices, in accordance with the latest information and techniques as well as a socialization mechanism for all workers following current technological developments. The unit of certification also develops guidelines for farmers by providing systematic training for continuous improvement. Some of the evidence that has been applied for continuous improvement include:</p> <p>Social and Environmental Aspect</p> <ul style="list-style-type: none"> • The company has implemented biological pest control in this case by using host plants and barn owls to reduce the use of pesticides, especially insecticides and rodenticides. • Management and monitoring of fires in company border areas that benefit the community. • The use of renewable energy accordance to reduce the use of fossil fuels. • Waste management and monitoring through WWTP pond management, testing the quality of the effluent and reporting it to the Environmental Agency. • Air quality management and monitoring through several action like road maintenance, air quality testing, routine maintenance of vehicles and machines and vehicle upgrades. • Management and monitoring of surface and groundwater through testing the quality standard. • Green House Gas Management and using land clearing with mechanical and zero-burning policy. <p>Worker Welfare</p> <ul style="list-style-type: none"> • Unit certification has set minimum wage regulations for all workers based on the stipulation of minimum wages by the Governor of Bangka Belitung for 2022. • Unit certification facilitates workers with adequate housing, electricity facilities, and availability of clean water in every publicly available housing. • Unit certification is also committed to avoiding acts of discrimination, sexual harassment, child labor or acts of human rights violations in the work environment. <p>3.2.2 The company has shown PT JMS's RSPO Metrics Template version 2.1 document for the January – December 2021 data entry period. However, some of the data contained in the RSPO Metrics Template still does not match the actual data verified during stage -02, for example:</p> <ul style="list-style-type: none"> • HCV data in the Metrics Template is 355 Ha, while in the 2022 hectare statement the area of HCV is 950.19 ha. • Total production area (ha) data in the Metrics Template is 8,262 Ha, while in the 2022 hectare statement the HCV area is 9,518 ha. • The number of certified estates is 3 units, while the number of estates to be certified is 6 units. • The data for planted peatland area (ha) in the Metrics Template is 4475 Ha, while in the peat inventory document the peat area is 4346 ha. • Name of RSPO member PT Eagle High Plantation and Name of certified unit Eagle High Plantation Palm Oil Mill, while the scope of PT Jaya Mandiri Sukses's certification is for Bangkirai POM. <p>The company can show PT JMS's RSPO Metrics Template version 2.1 document for Bangkirai POM, but it does not match the actual data at the time the IC audit was carried out. Nonconformity No. 2022.5 with Minor Category</p>		
3.2.2	Status: Nonconformity No. 2022.5 with Minor Category	
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.		

3.3.1

The company has a list of work procedures that apply to all subsidiaries of PT Eagle High Plantation, for example as follows:

Agronomy Procedure

- MAN-UOM-001 on agronomic technical guidelines which among other things explain:
 - Chapter II on oil palm nurseries
 - Chapter III on land clearing
 - Chapter IV on oil palm cultivation
 - Chapter V on weed control
 - Chapter VI on fertilization
 - Chapter VII on pests and diseases
 - Chapter VIII on guidelines for the use of agricultural chemicals
 - Chapter IX on road maintenance, ditches and water management, bridges and culverts
 - Chapter X on pruning
 - Chapter XI on boundary marking, census and identification of principal
 - Chapter XII on harvest preparation
 - Chapter XIII on harvesting and transportation
 - Chapter XIV on the utilization of mill waste
 - Chapter XV on environmental sustainability
- SOP-EHP-AGR-13 on peatland water management.

MILL Procedure

- SOP-MO-001 regarding mill operations, which consist of:
 - Chapter A is SOP-UOM-MO-001 regarding FFB acceptance
 - Chapter B is SOP-UOM-MO-002 regarding CPO and PK production
 - Chapter C is SOP-OTC-003 regarding the delivery of CPO and PK
 - Chapter D is SOP-UOM-MO-004 on cleaning CPO storage tanks
- SOP-EHP-Mill-10 on Nonconformity Control.
- Work Instruction-Mill-01 on weighbridge.
- Work Instructions –Mill-08 about kernel factory.

Based on the document review, it can be concluded that the existing procedures cover all processes and activities in the plantations and factories and are placed in special cabinets. In addition, the procedure also includes the effective date of the procedure and approval from management, for example the SCCS procedure with the number SOP-OTH-F3-022 regarding the Supply Chain of Raw Materials and Production dated January 10, 2019 which was approved by the CEO.

Based on interviews with spray workers, it can be concluded that workers understand the procedures applied in the company, as well as regular socialization related to company procedures.

3.3.2

The company carries out an internal operational audit as stated in the Problem Identification Corrective Action document which explains the consistency checks of management implementation of company procedures that are carried out regularly on plantations and mills, as was the last time at Jati Mas Estate on May 2022, with 8 non-compliance results. The findings have been corrected until June 30, 2022.

3.3.3

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

	Status: Comply	
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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 company has several documents related to social and environmental impact studies which are carried out independently and participatively by involving affected stakeholders. Some of the documents owned by the company include:

Environmental Aspect

The company already has environmental documents in the form of AMDAL year 2007 covering an area of 21,000 hectares (scope location permit) for core estate and smallholders. The AMDAL document was ratified by the Kutai Kartanegara Regency AMDAL document Assessment Commission with Number: KAKK/09/AMDAL/PERKEBUNAN/2007 dated 18 June 2007. The Environmental Impact Analysis/AMDAL (AMDAL, RKL, RPL) Activities of the POM and the composting Plant PT. Jaya Mandiri Sukses with a capacity of 60 Tons of FFB/Hour with a scope based on a Location Permit for Palm Oil Processing and composting station activities covering an area of 14.9 Ha (Decree of the Regent of Kutai Kartanegara No. 590/525.29/002/A.Ptn. In the Perian Village area, Muara Muntai District. The AMDAL document was ratified by the Regional Environmental Agency (BLHD) of Kutai Kartanegara Regency with Number: KAKK/27/AMDAL/PABRIK-KOMPOSTING/X/2010 dated 28 October 2010.

Based on the results of interviews with the Environmental Service of Kutai Kartanegara Regency, it is known that the AMDAL document owned by the company is in accordance with the provisions of the legislation. The results of document verification show that the total area and operational activities of the company have been covered in the environmental documents owned.

Social Aspect

The company has PT JMS Social Impact Assessment Report (SIA) conducted in Januari 2012 by PT Sonokeling. The area being assessed by PT JMS SIA by location permit area of 21,000. SIA covers all aspects of internal impact consist of OHS, SOP implementation, housing, clean water and social facilities and increase in human resources, meanwhile external impact consist of using of local labour, transparency of the FFB price, Environmental degradation, CSR and population administration. The consultation involving affected parties. Records showing evidence involving affected parties, including attendance on October 27, 2011 which was attended by 37 participants and a list of 42 participants. In the SIA document it is explained that the implementation method is carried out by interview, group discussion/FGD and observation. Based on interviews with village representatives, it is known that the SIA was prepared in a participatory manner and all existing social impacts have been identified by the company.

Based on document verification, it is known that the scope of the social impact assessment has covered all villages, farmers, and has involved internal workers. In addition, based on the results of interviews with representatives of Lebak Cilong village, Lebak Mantan village, Muara Leka village, Perian village, Kayu Batu village, and Muara Aloh village, it is known that the social impacts of the existence of companies such as CSR and employment and these impacts have been covered in the SIA document.

3.4.2

As a form of social management, the company has developed/compiled by involving independent parties in conducting social impact assessments related to the company's operational activities. In the social study, the affected villages were Lebak Cilong Village, Lebak Former Village, Muara Leka Village, Perian Village, Kayu Batu Village, and Muara Aloh Village. The social impact assessment was first carried out in January 2012 by Sonokelin as a follow-up to the results of the assessment, there are several recommendations / matrices for social impact management and monitoring plans, including:

Internal impact

- OHS
- Implementation of SOP
- Housing, clean water
- social facilities
- improvement of human resources

External impact

- Use of local labor
- Transparency in the purchase price of FFB
- Environmental degradation

- CSR
- Population administration

As one of the efforts to improve and for attention to the latest situation from 2012 the company carried out the Social Impact Review and Implementation which was carried out in 2020, where this was due to the dynamic social situation.

The SIA review results cover 38 activities, for example:

- Identify constraints and barriers to community infrastructure development
- Community involvement in the preparation of CSR
- Assistance in plasma financial management
- Designing long-term village programs
- Monitor the surface water quality of the surrounding community
- Make plantation SOP, discipline and OHS
- Provide explanations regarding company policies to the public
- Treat every employee as important part
- Provide appropriate salary and benefits to employees
- Maintain employee facilities
- Regular visits to employees
- Work accident data collection
- Employee health check.

The SIA review was carried out by involving the surrounding community, in a group discussion forum activity which was carried out on July 6 2021. The stakeholders involved in the activity were the Village Secretary of Muara Leka, SMP N 1 teacher, KA UPT Disbun, community leaders and traditional leaders.

The company also shows the SIA Planning and Monitoring matrix for 2021, namely:

External

- The proportion of labor
- FFB price transparency
- Decline in environmental quality
- CSR and social assistance
- Orderly population administration.

Internals

- Application of safety standards
- SOP and corporate culture
- Housing, clean water and social facilities
- Adequacy and quality of human resources.

In an effort to follow up on the 2020 SIA review recommendations, the company has developed a social management and monitoring plan for 2021, but in the process of preparing the document it was discovered that:

- External stakeholders involved in preparing social management and monitoring plans are still limited to a number of affected stakeholders, for example, only Muara Leka village (Sekdes, teachers, traditional leaders and community leaders). Meanwhile, based on the scope of the 2012 SIA study, the villages affected were Lebak Cilong Village, Lebak Former Village, Muara Leka Village, Perian Village, Kayu Batu Village, and Muara Aloh Village and had not considered the parties who were widely affected, for example women, the government, plasma farmers, parties who use water resources around, and cultivators.
- Internal stakeholders have not been directly involved in the management plan and social monitoring.

So that with the limited number of parties involved in preparing the social management and monitoring plan, there are several issues that have not been identified that have been monitored and managed in a comprehensive and integrated manner, for example:

- Issues regarding wages and employee *BPJS*.
- Issues regarding labor status.
- Issue regarding OHS implementation.
- Employee housing facilities.

The social impact management and monitoring plan has not been developed in a participatory manner by involving all stakeholders who are widely affected so that there are several issues that have not been identified that have been monitored and managed in a comprehensive and integrated manner. **Based on that's explanations its became non conformity No 2022.06 with minor category**

3.4.3

Environmental Aspect

The company involves the Environment Agency and the Ministry of Environment 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 that are 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 vision, mission and government programs so that they can run synergistically. This can be proven based on the results of an interview with the Kutai Kartanegara Regency Environmental Service who conducted a field visit in early May 2022 to conduct a study related to the process of preparing hazardous waste permit documents. Monitoring and updating related to environmental impact management is also carried out in conjunction with an evaluation of HCV management which is described in more detail in indicator 7.12.4. 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 Aspect

The company has implemented social management and monitoring plans, such as:

External

- The proportion of labor
- FFB price transparency
- Decline in environmental quality
- CSR and social assistance
- Orderly population administration.

Internals

- Application of safety standards
- SOP and corporate culture
- Housing, clean water and social facilities
- Adequacy and quality of human resources.

This evaluation activity is also a reference in the preparation of the Social Impact Management and Monitoring Plan Matrix for the period year 2021. 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.

Based on an interview via telephone with the nearest community known that SIA, management and monitoring plan has been conducted in an involved manner with affected Village with a Forum Group Discussion (FGD) and no issue raised by the community.

3.4.2	Status: Nonconformity No. 2022.6 with Minor Category
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3.5

A system for managing human resources is in place.

3.5.1

The company has an HR management system that aims to manage the workforce in accordance with the provisions of the existing laws in Indonesia as follows:

Employee Recruitment Procedure

The company has procedures for recruiting workers which are contained in Employee Recruitment Standard Operating Procedure (SOP), document number SOP-HC-006 dated March 1, 2021. This procedure explains the Employee Planning

and Demand Policy, Employee Recruitment Policy and Employee Recruitment Policy. Recruitment and Placement of Employees. In addition, it also explained about the Employee Request Process, Employee Recruitment Process and Inter-Regional Non-Staff Employee Recruitment Process.

Career Path System and Job Performance Assessment

The system for career paths and work performance evaluation is regulated in the document SOP/HC-OD/P.011, Revision 30 May 2016. The document describes the procedure for the stages of performance appraisal and employee career paths (promotion, demotion, and mutation).

Retirement and Termination

In addition, the mechanism regarding termination of employment and retirement is contained in the Company Regulations. In Article 37 A it is explained that in the event of termination of employment, the company will treat the rights as a result of employee layoffs based on the provisions of Law no. 11 of 2020 concerning Job Creation Chapter IV Employment, Government Regulation No. 35 concerning Temporary worker, Outsourcing, working time breaks and termination of employment.

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.

The company has shown examples of records of hiring workers from daily worker to *SKU* (permanent worker) complete with documents such as assessment results, health check results, job applications, ID cards and others. For example Decree No. 20-SK/BKRE-INT/VIII/2022 dated 1 August 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 already has an OHS Policy as stated in a Sustainability Policy issued by the President Director on 8 June 2020 which states that all workers must comply with all regulations related to OHS, to maintain a clean and sanitary working environment, to use and maintain work equipment and Personal Protective Equipment (PPE) provided and report any accidents that occur.

The company also shows the SOP with No. SOP-OTH-F3-006 concerning Investigation of Occupational Incidents, Accidents and Diseases, Version 2.0 effective January 10, 2019. Activities are risk assessed to identify OHS problems, which are briefly shown as follows :

- The latest "PT JMS Hazard Identification and OHS Risk Assessment – Mill" document in January 2022 which includes 24 activities at the EHP Mill such as activities in the sterilizer, boiler, press, etc.
- The latest "PT JMS Hazard Identification and OHS Risk Assessment – Estate" document in January 2022 which includes 31 activities at BLP Estates (ARJE, SMRE, BRME) such as harvesting, fertilizer, spraying, etc.

Based on the results of the document verification, it is known that it still does not accommodate potential exposure to chemicals for workers loading/retailing fertilizer, fire patrols and monitoring of HGU stakes. The company has the opportunity to improve the K3 Hazard Identification and Risk Assessment documents for all work units. **OFI**

3.6.2

The following are a number of points related to observing the effectiveness of OHS in the management unit, including:

Medical examination

- Based on the results of verification of the employee list document for the period October 2022, it is known that there are 437 employees working at Gaharu Estate.
 - Based on the results of field observations and interviews with spray workers in Block W42, Division 2, Bangkirai Estate, it is known that there are spray workers with the initials BLF and VCO who have not received special medical examination facilities.
 - The company can show evidence related to a general medical examination at PT Jaya Mandiri Sukses, for example a general health examination for the Gaharu Estate unit which was carried out on 17-20 June 2022 for 216 workers.
 - Companies can also show special medical examinations (audiometry, cholinesterase, spirometry) at PT Jaya Mandiri Sukses, for example at Bangkirai Estate:
 - Cholinesterase-spirometry examination for 9 spray employees and 2 warehouse staff.
 - Spirometry examination for 8 fertilizer employees.
 - Audiometric inspection for 2 generator operator employees.
- Based on the verification results, there were 2 spray workers with the initials BLF and VCO who had not received special medical examination facilities (cholinesterase-spirometry).

Harvest-Fertilizer and Spray-Harvest activities in one block

- Based on the results of field observations in Block T51/52, Division 2, Angsana Estate, it is known that there are simultaneous fertilizer-harvesting and spray-harvesting activities in Block T51/52. Based on the verification of the risk identification documents, it was discovered that the risks had not been analyzed for the fertilizer-harvesting and spray-harvesting activities carried out in 1 block.
- Furthermore, there is no warning of spray application areas for spraying activities in Block T51/52, Division 2, Angsana Estate.
- Based on the results of interviews with the management unit, it was found that there were concurrent activities in one block because around 70% of the Angsana Estate area was inundated as a result of high rainfall in the October period, which disrupted the harvest-spray-fertilizer rotation.

Occupational Accidents of workers with BHL status (contract worker)

- Based on the results of field observations and interviews with harvest workers at Jatimas Estate, it is known that there are harvest workers with the initials INN (Harvest – contract worker) who experience work accidents when they are struck by FFB on their heads, so they are included in the majority category.
- Based on the results of a review of OSH and environmental incident investigation documents, it is known that a worker with the initials INN had a work accident on July 20, 2022.
- Based on the results of a review of the P2K3 meeting minutes document on August 15, 2022, it is known that the meeting did not discuss the incident of a work accident that happened to the INN.
- Based on the results of a review of P2K3 reporting documents for Quarter 3 for the 2022 period, it is known that there is no information on work accidents that have happened to workers with the initials INN in the work accident reports.

Based on the description above, there is not enough evidence that the company has monitored the effectiveness of the OSH plan to deal with OSH risks. **Based on that's explanations its became non conformity No 2022.07 with Major category**

3.6.2	Status: NC No. 2022.07 with Major Category
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3.7

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

3.7.1

The company has not been able to show a training program for all staff, plasma workers, smallholders and outgrowers covering aspects of the RSPO principles and criteria. **Based on that's explanations its became non conformity No 2022.08 with Major category**

3.7.2.

The company has not been able to show the realization of training for all staff, workers, plasma smallholders and

outgrowers covering aspects of the RSPO principles and criteria. **Based on that's explanations its became non conformity No 2022.09 with Minor category**

3.7.3

Company showed that they had properly documented every training activity and socialization that had been carried out to all workers, contractors, and related stakeholders. The training of SCCS had been conducted on 31 October for security, weighbridge, laboratorium supervisor and grading assistant. Based on interview to the workers involved in supply chain operations, such as security (for FFB receiving verification), weighbridge operator (for deviding amount of certified and uncertified sourced), the PIC related to supply chain has been understood the supply chain mechanism.

3.7.1 Status: NC No. 2022.08 with Major Category

3.7.2 Status: NC No. 2022.09 with Minor Category

3.8

Supply Chain Requirements for Mills

3.8.1, 3.8.2

Bangkirai Mill is still uncertified and received FFB from own estate, scheme stakeholder, and independent supplier. Own estate and scheme smallholder is now in process of RSPO certification and independent supplier is still RSPO uncertified. So, Bangkirai mill will implement Mass Balance module.

3.8.3

Company has estimated the FFB, CPO & PK produced from certification area (HGU) during the next 12 months, with details:

Product	Projection certified volume (Ton) (12 months)
FFB	120,000
CPO	30,000
PK	6,000

3.8.4

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

- Member ID: RSPO_PO 1000004857
- Member Name: PT Jaya Mandiri Sukses
- RSPO member number: 1-0048-08-000-00

3.8.5

The company has procedures about the supply chain mechanism in Work Instruction document No. IKA-OTH-F3-022.01 Certified Product Handling dated November 1, 2022. This document contains duties and responsibilities of related personnel, handling certified products, evaluation of FFB suppliers and other third parties, RSPO SCCS internal audit, RSPO SCCS review management, and RSPO SCCS training and refreshment.

Regarding the company's areas that do not yet have HGU, the company has also created a mechanism for segregating FFB. In the section on handling certified products, it is explained that:

- The manager determines certified FFB source blocks and separates certified and non-certified FFB.
- Blocks bordering certified and non-certified FFB are distinguished from the origin of FFB and the place where the fruit is collected.
- Boundary of certified fruit in the form of marking (direction) of land claimed as certified source and non-certified land.
- If there are blocks where the boundaries of certified and non-certified fruit are not aligned/split into blocks, then the TPH supplied from certified land will be downgraded and claimed to be non-certified.

3.8.6

Company has conduct internal audit of RSPO which include about supply chain in its assessment on 25 – 29 April 2022. Result of internal audit is there are 30 nonconformities, include 8 nonconformities about supply chain standard, among others SCCS training, mass balance report, palmtrace data, and stakeholder list. The non conformity has been closed out on 31 October 2022. A management review to address non-compliance with the RSPO internal audit was conducted on 11 November 2022.

3.8.7, 3.8.8

Bangkirai Mill is not certified yet, so this indicator will be verified in ASA 1.

3.8.9, 3.8.10, 3.8.11

The Bangkirai mill still does not have certified products, so this indicator will be verified in ASA 1.

3.8.12

The records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements will be verified in ASA-1.

3.8.13, 3.8.14

Bangkirai Mill has determine the extraction rate of oil and kernel. Based on production data from November 2021 – October 2022, the OER is 23.04% and KER 4%. The extraction rate is updated periodically every month based on actual production of CPO and PK and also FFB processed.

3.8.15

Bangkirai mill will apply MB module.

3.8.16, 3.8.17

The Bangkirai mill still does not have certified products, so this indicator will be verified in ASA 1.

	Status: Comply	
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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

There is a policy to respect human rights, which is contained in the Sustainability Policy document, which was approved by the Main Director, revised on June 11, 2018. The policy explains that EHP respects human rights as stipulated in the UDHR and ILO Core Conventions, if promulgated in Indonesian law, including protecting human rights defenders and prohibiting retaliation against human rights defenders.

Based on interviews with stakeholders and employees, it was conveyed that stakeholders already know about the sustainability policy, especially regarding human rights. In addition, the company has also provided examples of documentation of company policy socialization, for example, documentation of socialization which was carried out on September 4, 2021 which was attended by 55 participant.

4.1.2

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

	Status: Comply	
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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

Company has an SOP for handling complaints and grievance from various parties, namely in the SOP no: SOP-OTH-F3-019, dated January 10, 2019. In the SOP describes the handling of complaints starting from the stage of receiving complaints from internal and external, verification and ranking of complaints, preparation of treatment plans, implementation of handling, monitoring of implementation, and documentation to completion through legal channels. Guarantee anonymity of the whistle-blower of the case has been maintained since from first stage. In the SOP it is stated that the settlement of complaints is made no later than 1 month after receipt. In the Action Closing and Documentation section it is explained that if the agreement of both parties is not reached by agreement, the related parties can report through the RSPO Complaints System.

The results of interviews with workers and labor union known that workers understand the grievance mechanism. Complaints can also be submitted to bipartite cooperation or labor union.

4.2.2

Based on the results of interviews with management, it was conveyed that there were no procedures in place to ensure the system was understood by affected parties, including those who could not read or write.

Based on the explanation above, it is concluded that the company does not yet have procedures to ensure that the system is understood by affected parties, including those who cannot read or write. **Based on that's explanations its became non conformity No 2022.10 with Minor category**

4.2.3

Based on documents verifications the company has a complaint procedure No. SOP-OTH-F3-019 dated 10 January 2019. The SOP explains that all complaints must be recorded. Based on verifications on Logbook of complaints at Bangkirai Estate, Bangkirai Mill a Jatimas Estate already informed that all complaints have been followed up. However based on result of interview with workers it was known:

- The results of interviews with mill workers revealed that there were several complaints related to housing. However, there is no complaint information in the complaint logbook.
- The results of interviews with harvest workers at Jatimas Estate revealed several complaints, such as wage cuts and BPJS.

Based on the explanation above, it is concluded that the company has not been able to show evidence that all complaints from stakeholders have been recorded by the company along with information on complaint handling to the parties. **Based on that's explanations its became non conformity No 2022.11 with Minor category**

4.2.4

The CH has an SOP for handling complaints and grievance from various parties, namely in the SOP no: SOP-OTH-F3-019, dated January 10, 2019. In the SOP describes the handling of complaints starting from the stage of receiving complaints from internal and external, verification and ranking of complaints, preparation of treatment plans, implementation of handling, monitoring of implementation, and documentation to completion through legal channels. Guarantee anonymity of the whistle-blower of the case has been maintained since from first stage. In the SOP it is stated that the settlement of complaints is made no later than 1 month after receipt. In the Action Closing and Documentation section it is explained that :

- If in deliberations the two parties have not reached an agreement, then efforts are made to mediate by involving the local government such as the sub-district or district level.
- if the agreement of both parties is not reached by agreement, the related parties can report through the RSPO Complaints System.
- And if still don't get results and an agreement, then efforts are made to take the legal route that applies in Indonesia.

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

4.2.2	Status: NC No. 2022.10 with Minor Category	
4.2.3	Status: NC No. 2022.11 with Minor Category	
4.3		
The unit of certification contributes to local sustainable development as agreed by local communities.		
4.3.1		
<p>The company has the following community cooperation development partnerships in order to contribute to local communities development:</p> <p>Koperasi Sawit Agung Baya Cooperation agreement dated June 13, 2006 between the Agung Baya Cooperative and PT. Jaya Mandiri Sukses signed by Head of Perian Village, Muara Muntai Sub-district Head, Head of Agung Baya Cooperative and PT Jaya Mandiri Sukses. The the first party will get a land distribution of 20 percent of the total area of the company's plantations planted with oil palm plantations.</p> <p>Koperasi Sawit Keham Lestari Cooperation agreement dated February 27, 2006 between the Keham Lestari Cooperative and PT. Jaya Mandiri Sukses signed by Head of Lebak Mantan Village, Muara Wis Sub-district Head, Head of Keham Lestari Cooperative and PT Jaya Mandiri Sukses. The the first party will get a land distribution of 20 percent of the total area of the company's plantations planted with oil palm plantations.</p> <p>Koperasi Sawit Leka Mandiri Cooperation agreement dated January 2, 2006 between the Leka Mandiri Cooperative and PT. Jaya Mandiri Sukses signed by Head of Muara Leka, Muara Muntai Sub-district Head, Head of Muara Leka Cooperative and PT Jaya Mandiri Sukses. The the first party will get a land distribution of 20 percent of the total area of the company's plantations planted with oil palm plantations.</p> <p>In addition, the company also had work agreement with local community such as independent FFB supplier, contractor for operational activity in estate and mill. For example: FFB supplier: CV Regar, PT BGP, PT WAU Contractor: CV Indah Angrah Utama</p> <p>Based on results of interviews with Perian Village, Lebak Mantan Village, and Muara Leka Village representative, it is known that communication between company and surrounding community is good. From the interview results, it was conveyed that the company had provided CSR assistance to the surrounding community in accordance with the identification needs.</p>		
	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		
<p>The company already has proof of the legality of land rights in the form of Cultivation Rights (HGU), based on the Decree of the Head of BPN No. 68-HGU-BPN.RI-2009 dated 07 May 2009 and SK No. 57/HGU/BPN.RI/2013 dated August 1, 2013 with a total area of 14,665.75 ha. The entire PT JMS HGU is located in Kutai Kartanegara Regency, East Kalimantan Province, consisting of 13 HGU Certificates, However, based on documents verifications the scope of certifications area are 13,312.16 Ha its due to there are area overlapping with other company subsidiary of Eagle High Plantations, mining company, forest product company.</p> <p>The company also already has a plantation business license as shown in the following documents.</p> <ul style="list-style-type: none"> Decree No. No. 503/11/SK-DISBUN KUKAR/XII/2005 dated 21 December 2005 about plantation business permit for oil palm cultivation covering an area of 21,000 ha, located in Lebak Cilong Village, Lebak Mantan and Sebeban Village, Muara Wis District; and Muara Leka, Perian, Kayu Batu and Muara Aloha Villages, Muara Muntai District; Kutai Kartanegara Regency. 		

- Decree No. 525/03/IUP-P/DPK.IV/2012 for dated 5 June 2012 about plantation business permit for oil palm processing (Bangkirai Mill) with an installed capacity of 60 tons of FFB/hour.

Based on interviews with the management unit, and related agencies such as the Plantation Office of Kutai Kartanegara Regency, it is known that there has been no change in the operational area and an addition to the processing capacity of the Bangkirai Mill.

4.4.2, 4.4.4, 4.4.5, 4.4.6

Based on the Minutes of Land Inspection (Committee B) of Kalimantan Timur Province in its treatise dated 23 November 2007 No: 540.2/14/RPT.PAN.B/XI/2007, stated that the land requested was State land that had been controlled by the applicant, which was originally partly covering an area of 7,242.72 Ha there is community control on behalf of Mr. Burhan, et al. However, the community has no objection to handing over the cultivated/controlled lands to PT Jaya Mandiri Sukses.

Then based on the Minutes of Land Inspection (Committee B) of Kalimantan Timur Province in its treatise dated 16 June 2008 No: 540.2/RPT.PAN.B/IV/2008, stated that the requested land has the status of State land and is entirely within the Non-Forest Cultivation Area (KBNK) in accordance with the Regional Spatial Plan (RTRW) of the Province of East Kalimantan and PT JMS have released the control/works of the Perian Village community on behalf of Sde. Kasran bin Ijuh, et al (104 people) covering an area of 3,801 Ha.

Companies can show land acquisition documents such as compensation and compensation for arable land within HGU owned by the community. There is evidence that the development of the nucleus and plasma partnerships begins with the handover of community-owned land to the company. Communities/land owners surrender their land with a ratio of 20% for development of plasma plantations and 80% for development of nucleus plantations (PT Jaya Mandiri Sukses). The community is willing to hand over the land to be managed by the company through a 'Declaration off handovers of a piece of land'. The handover of the land was witnessed by the Head of the Partner Cooperative and the village government. The mechanism for acquiring land rights is also through a land compensation mechanism.

Although PT JMS has gained land rights legally, there are still many people using and cultivating in the permit areas, it's due to the owner not willing to be compensated. The company has had the Area Statement map that described various land use in permit Areas, including area width. Based on documents verifications it was known there are 3,525 Ha That's areas managed by the community (in the form of palm oil, rubber, or horticulture), overlapping with other company subsidiary of Eagle High Plantations, mining 35enstrual35i forest product company. In other information, there is no significant land conflict in PT. JMS related to the existence of arable areas in the company's permit area.

Based on interview with representative of Perian, Lebak Mantan, and Muara Leka Village, it is known that the villagers is willing to hand over the land to be managed by the company and get the part of scheme smallholder. There is no re-claim from villagers until now. From interview with the previous land owner, it is known that the land has been handed over to the company and the land owner will become part of associated smallholder. Also some of previous land owner has moved from the villages or can not be contacted again.

The compensation process is based on the basis of consultation and negotiations are transparent and meet the demands for social justice. The company has been shown evidence of land compensation to related parties. The sample of process land compensation present to the landowner was sighted, the copy was made in Bahasa and known by all relevant parties. Although the legal status acquired land is located within the Land Use Title area of the company, which is in the law the company is controlled legally. These processes involved the landowner and were approved by the head of the village and the head of the sub-district. The documented process of land compensation was signed by a related party, filed in each estate.

4.4.3

Based on the HGU Decree and interview with management, the process of land acquisition until the granted of HGU has been in accordance with the law and with participatory mapping on cadastral mapping system conducted by Land Agency.

The Company has a boundary map completed with scale, number of boundary poles and coordinates issued by National Land Agency. Monitoring of boundary poles is conducting every six months based on the procedure SOP of Installation

and Management of Boundary Stones (SOP/Umum-14 dated 7 August 2012). Based on interview with representative of Perian, Lebak Mantan, and Muara Leka Village, there is no legal and customary rights in their respective area. Originally, their area was transmigrant area.

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 documents verifications, field observation and interview with management it was known there are new planting after 2010 covering 789,32 Ha in Jatimas Estate Covering 182.78 Ha; Gahariu Estate 184.07 Ha; Trembesi Estate 93.76 Ha and Angsana Estate 318 ha.

The previous land acquisition document has been verified, as well as consultation with previous land owner, known that the land acquisition has been conducted in FPIC manner, in accordance with SOP of Land Compensation Procedure (No. SOP-EHP-SC-001 version 1 effective from 1 March 2015) and Free, Prior, Informed, and Consent Procedure (NO. SOP-OTH-F3-021 version 1, effective from 10 January 2019). The procedure has been disseminated to the community parties with appropriate forms and languages (*Bahasa Indonesia*). The process starts from identification and mapping followed by measurement and physical check of the field then the social capital team will negotiate the price witnessed by Village Officials.

4.5.2

As mentioned in indicator 4.4.2, The company can show land acquisition documents such as compensation and compensation for arable land within HGU owned by the community. There is evidence that the development of the nucleus and plasma partnerships begins with the handover of community-owned land to the company. Communities/land owners surrender their land with a ratio of 20% for development of plasma plantations and 80% for development of nucleus plantations (PT Jaya Mandiri Sukses). The community is willing to hand over the land to be managed by the company through a 'Declaration of handovers of a piece of land'. The handover of the land was witnessed by the Head of the Partner Cooperative and the village government. The mechanism for acquiring land rights is also through a land compensation mechanism.

Based on interview with representative of Perian, Lebak Mantan, and Muara Leka Village, it is known that the villagers is willing to hand over the land to be managed by the company and get the part of scheme smallholder. There is no re-claim from villagers until now. From interview with the previous land owner, it is known that the land has been handed over to the company and the land owner will become part of associated smallholder. Also some of previous land owner has moved from the villages or can not be contacted again.

4.5.3

As mentioned in indicator 4.4.2 Based on interviews with previous land owner when the public consultation stated that the company had negotiated and paid for land compensation in accordance with the agreement, there was no coercion and witnessed by government representatives.

4.5.4; 4.5.5; 4.5.6

Based on interview with representative of Perian, Lebak Mantan, and Muara Leka Village, it is known that the villagers is willing to hand over the land to be managed by the company and get the part of scheme smallholder. There is no re-claim from villagers until now. From interview with the previous land owner, it is known that the land has been handed over to the company and the land owner will become part of associated smallholder. Also some of previous land owner has moved from the villages or can not be contacted again.

The compensation process is based on the basis of consultation and negotiations are transparent and meet the demands for social justice. The company has been shown evidence of land compensation to related parties. The sample of process land compensation present to the landowner was sighted, the copy was made in Bahasa and known by all relevant parties. Although the legal status acquired land is located within the Land Use Title area of the company, which is in the law the

company is controlled legally. These processes involved the landowner and were approved by the head of the village and the head of the sub-district. The documented process of land compensation was signed by a related party, filed in each estate

4.5.7 ; 4.5.8

Based on documents verifications, field observation and interview with management it was known there are new planting in 2010 located in the company permits area that been compensated. The previous land acquisition document has been verified, as well as consultation wit previous land owner, known that the land acquisition has been conducted in FPIC manner, in accordance with SOP of Land Compensation Procedure (No. SOP-EHP-SC-001 version 1 effective from 1 March 2015) and Free, Prior, Informed, and Consent Procedure (NO. SOP-OTH-F3-021 version 1, effective from 10 January 2019). The procedure has been disseminated to the community parties with appropriate forms and languages (*Bahasa Indonesia*). The process starts from identification and mapping followed by measurement and physical check of the field then the social capital team will negotiate the price witnessed by Village Officials.

Status: Comply

4.6

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

4.6.1, 4.6.2, 4.6.3, 4.6.4

The company has not carried out any new planting's activities. Based on interview with representative of Perian, Lebak Mantan, and Muara Leka Village and previous land owner, there is no legal and customary rights in their respective area. Originally, their area was transmigrant area. Also there is no new planting activity in PT JMS.

The previous land acquisition document has been verified, as well as consultation wit previous land owner, known that the land acquisition has been conducted in FPIC manner, in accordance with SOP of Land Compensation Procedure (No. SOP-EHP-SC-001 version 1 effective from 1 March 2015) and Free, Prior, Informed, and Consent Procedure (NO. SOP-OTH-F3-021 version 1, effective from 10 January 2019). The procedure has been disseminated to the community parties with appropriate forms and languages (*Bahasa Indonesia*). The process starts from identification and mapping followed by measurement and physical check of the field then the social capital team will negotiate the price witnessed by Village Officials.

Companies can show land acquisition documents such as compensation and compensation for arable land within HGU owned by the community. There is evidence that the development of the nucleus and plasma partnerships begins with the handover of community-owned land to the company. Communities/land owners surrender their land with a ratio of 20% for development of plasma plantations and 80% for development of nucleus plantations (PT Jaya Mandiri Sukses). The community is willing to hand over the land to be managed by the company through a 'Declaration off handovers of a piece of land'. The handover of the land was witnessed by the Head of the Partner Cooperative and the village government. The mechanism for acquiring land rights is also through a land compensation mechanism.

Although PT JMS has gained land rights legally, there are still many people using and cultivating in the permit areas, it's due to the owner not willing to be compensated. The company has had the Area Statement map that described various land use in permit Areas, including area width. Based on documents verifications it was known there are 3,525 Ha That's areas managed by the community (in the form of palm oil, rubber, or horticulture), overlapping with other company subsidiary of Eagle High Plantations, mining 37enstrual37i forest product company. In other information, there is no significant land conflict in PT. JMS related to the existence of arable areas in the company's permit area.

Based on interview with representative of Perian, Lebak Mantan, and Muara Leka Village, it is known that the villagers is willing to hand over the land to be managed by the company and get the part of scheme smallholder. There is no re-claim from villagers until now. From interview with the previous land owner, it is known that the land has been handed over to the company and the land owner will become part of associated smallholder. Also some of previous land owner has moved from the villages or can not be contacted again.

The compensation process is based on the basis of consultation and negotiations are transparent and meet the demands for social justice. The company has been shown evidence of land compensation to related parties. The sample of process land compensation present to the landowner was sighted, the copy was made in Bahasa and known by all relevant parties. Although the legal status acquired land is located within the Land Use Title area of the company, which is in the law the company is controlled legally. These processes involved the landowner and were approved by the head of the village and the head of the sub-district. The documented process of land compensation was signed by a related party, filed in each estate.

Status: Comply

4.7

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

4.7.1, 4.7.2, 4.7.3

The company has not carried out any new planting's activities. Based on interview with representative of Perian, Lebak Mantan, and Muara Leka Village and previous land owner, there is no legal and customary rights in their respective area. Originally, their area was transmigrant area. Also there is no new planting activity in PT JMS.

The previous land acquisition document has been verified, as well as consultation wit previous land owner, known that the land acquisition has been conducted in FPIC manner, in accordance with SOP of Land Compensation Procedure (No. SOP-EHP-SC-001 version 1 effective from 1 March 2015) and Free, Prior, Informed, and Consent Procedure (NO. SOP-OTH-F3-021 version 1, effective from 10 January 2019). The procedure has been disseminated to the community parties with appropriate forms and languages (*Bahasa Indonesia*). The process starts from identification and mapping followed by measurement and physical check of the field then the social capital team will negotiate the price witnessed by Village Officials.

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Companies can show land acquisition documents such as compensation and compensation for arable land within HGU owned by the community. There is evidence that the development of the nucleus and plasma partnerships begins with the handover of community-owned land to the company. Communities/land owners surrender their land with a ratio of 20% for development of plasma plantations and 80% for development of nucleus plantations (PT Jaya Mandiri Sukses). The community is willing to hand over the land to be managed by the company through a 'Declaration of Surrender of a piece of land'. The handover of the land was witnessed by the Head of the Partner Cooperative and the village government. The mechanism for acquiring land rights is also through a land compensation mechanism.

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

Based on interview with representative of Perian, Lebak Mantan, and Muara Leka Village and previous land owner, there is no land conflict with PT JMS. The previous land acquisition document has been verified, as well as consultation wit previous land owner, known that the land acquisition has been conducted in FPIC manner, in accordance with SOP of Land Compensation Procedure (No. SOP-EHP-SC-001 version 1 effective from 1 March 2015) and Free, Prior, Informed, and Consent Procedure (NO. SOP-OTH-F3-021 version 1, effective from 10 January 2019). The procedure has been disseminated to the community parties with appropriate forms and languages (*Bahasa Indonesia*). The process starts from identification and mapping followed by measurement and physical check of the field then the social capital team will negotiate the price witnessed by Village Officials.

Companies can show land acquisition documents such as compensation and compensation for arable land within HGU owned by the community. There is evidence that the development of the nucleus and plasma partnerships begins with the handover of community-owned land to the company. Communities/land owners surrender their land with a ratio of 20% for development of plasma plantations and 80% for development of nucleus plantations (PT Jaya Mandiri Sukses). The community is willing to hand over the land to be managed by the company through a 'Declaration of Surrender of a piece of land'. The handover of the land was witnessed by the Head of the Partner Cooperative and the village government. The mechanism for acquiring land rights is also through a land compensation mechanism.

Although PT JMS has gained land rights legally, there are still many people using and cultivating in the permit areas, it's due to the owner not willing to be compensated. The company has had the Area Statement map that described various land use in permit Areas, including area width. Based on documents verifications it was known there are 3,525 Ha That's areas managed by the community (in the form of palm oil, rubber, or horticulture), overlapping with other company subsidiary of Eagle High Plantations, mining company and forest product company. In other information, there is no significant land conflict in PT. JMS related to the existence of arable areas in the company's permit area.

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION
5.1

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

5.1.1

Related to scheme smallholder FFB purchase, the Company has shown document of the Results of the Team Meeting for the Determination of Purchase Prices of Palm Oil FFB Production Sales of Planters in the Kalimantan Timur Province in October 2022. The company made a payment to the plasma party referring to the minutes.

Based on the company's agreement with the cooperative, the determination of the price of FFB purchased refers to the provisions contained in the Regulation of the Minister of Agriculture regarding the Guidelines for Determining the Purchase Price of Fresh Fruit Bunches for Palm Oil Production by Smallholders.

Based on interviews with Scheme smallholders (Keham Lestari) and FFB suppliers the FFB prices updating every once a month. The price information is available for them to inform What up group media and FFB prices signboard on Mill or monthly meeting.

5.1.2

The company shows several proofs of payments to Kemah Lestari cooperative for period dated 15 – 28 October 2022. The payment records contain completeness such as the extent of the work, minutes, to proof of payment via bank transfer. The payment records already match with price determined and informed by company and third parties' agreement.

5.1.3

The pricing mechanism above has been explained and regulated in a partnership agreement with scheme smallholders. In the agreement, there is a clause that regulates that the FFB pricing follows the price set by the government. This is consistent with the results of public consultations with representatives of Keham Lestari cooperative. Determination of selling FFB at a fair price, increasing or decreasing the FFB price, which has been agreed upon with the farmers and documented through monthly meetings with each plasma cooperative.

5.1.4

The results of interviews with members of the Keham Lestari cooperative stated that the price for the partnership cooperative's FFB was in accordance with the price set by the Plantations Office. From the results of the interviews, it was also conveyed that every payment as well as in production sharing activities/meetings was always accompanied by a pricing decree from the Plantation Agency, women participants were also present at the monthly meeting. Based on the results of the verification of the cooperation agreement letter and the list of members who are members of the cooperative, information is obtained that there are also women who are members of the cooperative.

5.1.5

Document verification and public consultation with community representatives, cooperative representatives and contractors during the IC audit showed that contracts made between the company and FFB suppliers as well as with local contractors were made in a fair, legal and transparent manner.

The plasma cooperatives and local contractors have understood the contractual agreements that they have entered into as evidenced by the agreement signed by both parties (the company and the plasma cooperative or contractor), as shown in the following example:

- The contract between the company and the Keham Lestari cooperative Lebak Former Village dated 27 February 2006, which was signed by company representatives, cooperative representatives and known by the Head of Lebak Former Village, Muara Wis Sub-district Head and known by the Kutai Kartanegara Regent.
- The contract between the company and the Perian Village Keham Lestari cooperative dated 13 June 2006, which was signed by company representatives, cooperative representatives and known by the Perian Village Head, Muara Muntai Sub-District Head and known by the Kutai Kartanegara Regent.

As for FFB local contractors are as follows:

- The contract between company and Personal Name dated 31 January 2022 number No.001/JMS-Fahruddin Siregar/TBS//2022, signed by company representatives and FFB suppliers.
- The contract between the company and PT WAU dated 03 January 2022 number No.003/JMS-PT WAU/TBS//2022, signed by company representatives and FFB suppliers.

Payment will be made within 15 working days after the payment request is received. The agreement (MoU) or contractual contract regulates in full and clearly the rights and obligations of both parties, the technical provisions of the agreement / work to a fair payment method agreed upon by both parties.

5.1.6

The pricing of FFB has been ruled on the work agreements:

- The company shows the Partnership Agreement between the Keham Lestari Palm Oil Cooperative and PT. JMS on April 18 2008. In the agreement letter it is known that the payment period for the remaining operating results (SHU) is given once every three months.
- The company shows the Partnership Agreement between Kopsa Leka Mandiri and PT. JMS on April 18 2008. In the agreement letter it is known that the payment period for the remaining operating results (SHU) is given once every three months.
- The company shows the Partnership Agreement between the Agung Baya Oil Palm Plantation Cooperative and PT. JMS on April 20 2008. In the agreement letter it is known that the payment period for the remaining operating results (SHU) is given once every three months.

The management unit can show proof of payment/distribution of the Remaining Results of Operations to the Plasma Cooperative that has been carried out in a timely manner according to the agreement they have, for example:

- Letter of request for payment of FFB from the Agung Baya Sawit Cooperative dated 25 July 2022 letter number 25.37/500/Kopsa-AGB/VII/2022.
- Recapitulation of payments for the Agung Baya Cooperative Bailout Fund for the 2022 period, from 9 September 2022 to 28 October 2022.

There are 22 proofs of FFB payment, for example proof of payment dated 28 October 2022 to the Sawit Agung Cooperative account number 1480011106XXX at 13:32 via internet banking.

5.1.7

The management unit can show Certificate of Test Results Equipment for weighing Number: 510.63/156/Disperindag/Metrologi/VII/2021 and 510.63/157/Disperindag/Metrologi/VII/2021 dated 30 June 2021 which are valid until 29 June 2023.

5.1.8

Based on the results of document verification and results of interviews with company representatives and FFB suppliers, basic information documents and results of verification of FFB supplier documents, information was obtained that Bangkirai POM was supplied by plasma plantations which were full managed and several FFB suppliers who were FFB agents. In this regard, the company has carried out outreach activities to support RSPO certification, for example for PT WAU and CV GP which will be held from 18 to 19 July 2022 located in Muara Muntai District.

5.1.9

The company has had SOP of Internal and External Complaint that (No Dok. SOP-OTH-F3-20). The purpose of the SOP is to complete every internal and external complaint both quickly and well and to create a safe and prosperous atmosphere within the company and surrounding communities. In the SOP it explains objectives, responsibilities, procedures, documentation and exceptions. The period year 2022 of complaint settlement is 2 weeks for each part. Based on document review of complaint book, there is no complaint from contractor or FFB supplier.

Base on interviews with Scheme smallholders (Keham Lestari) and FFB suppliers the FFB prices every once a month and plasma FFB payments are made every 3 months.

Status: Comply

5.2

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

5.2.1; 5.2.3; 5.2.5

Based on the results of document verification and results of interviews with company representatives and FFB suppliers, basic information documents and results of verification of FFB supplier documents, information was obtained that Bangkirai POM was supplied by plasma plantations which were full managed and several FFB suppliers who were FFB agents. In this regard, the company has carried out outreach activities to support RSPO certification, for example for PT WAU and CV GP which will be held from 18 to 19 July 2022 located in Muara Muntai District.

5.2.2

The company has consulted with smallholders to assess their interest in pursuing RSPO certification. The company can show the minutes of RSPO socialization to FFB supplier 18 to 19 July 2022 located in Muara Muntai District. The topic carried out are as follows:

- Data on the legality of smallholders' plantations and technical guidance on oil palm cultivation.
- RSPO on environment and OSH.
- Technical Agronomy and Manuring, harvest preparation, Weeding and weeds and Pest and disease.

5.2.4

The company has conducted pesticide handling training for FFB supplier 18 to 19 July 2022 located in Muara Muntai District. The socialization materials provided are as follows:

- Active ingredients in the use of environmentally friendly pesticides.
- Benefit income, HCV, manpower and FFB production record.
- Socialization to collect hazardous and toxic waste in one place.
- Information on the classification of chemically active ingredients.

Based on this explanation, it can be concluded that the company has conducted training on handling pesticides to plasma farmers and independent smallholders.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS
6.1

Any form of discrimination is prohibited.

6.1.1

The company has a policy regarding equal opportunities and treatment to get employment opportunities, which among

others are listed in the Sustainability Policy dated 11 June 2018. In point 7.6 it is stated that the company will not tolerate any form of discrimination that is carried out anywhere in the company's location, whether discrimination on the basis of race, skin color, religion, national origin, ancestry, gender, sexual orientation, marital status, age, disability or any other class are protected by law. Companies show evidence of policy outreach, for example:

- Dissemination to Agung Baya Village which will be held on 3 May 2021.
- Dissemination of policies to employees on 31 October 2022.

Based on verification of the labor list documents and interviews with labor unions and workers, it is known that the workers come from various ethnic groups, such as Java, NTT, NTB and others. The results of the interviews also revealed that there was no indication of discrimination against workers. In addition, from the results of interviews with village representatives, information was obtained that there was no indication of discrimination. The company has provided equal opportunities for local people to get jobs.

Based on the explanation above, it is known that the unit of certification has implemented a policy regarding equal opportunities and treatment to obtain employment opportunities.

6.1.2

Based on verification of the labor list documents and interviews with labor unions and workers, it is known that the workers come from various ethnic groups, such as Java, NTT, NTB and others. The results of the interviews also revealed that there was no indication of discrimination against workers. In addition, from the results of interviews with village representatives, information was obtained that there was no indication of discrimination. The company has provided equal opportunities for local people 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.

The company has shown examples of records of hiring workers from daily worker to SKU (permanent worker) complete with documents such as assessment results, health check results, job applications, ID cards and others. For example Decree No. 20-SK/BKRE-INT/VIII/2022 dated 1 August 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.

6.1.4

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

6.1.5

The company already has a women's committee that handles issues related to women or issues related to gender. The structure of the women's committee consists of a Coordinator, Secretary and Members from each Estate. The results of interviews with the chair of the women's committee, interviews with women workers obtained information that there were no cases or complaints related to women's issues. Furthermore The results of interview also revealed that the policies related to gender and women's rights that had been established by the company became a reference for the administrators to carry out activities and socialize to workers.

6.1.6

The determination of wages at Unit certification is based on the minimum wage in Kutai Kartanegara District based on the Decree of the Governor of Kalimantan Timur No. 561/K.598/202 on November 30, 2021. The Minimum Wage for Kutai

Kartanegara District in 2022 is Rp. 3,199,654.80. Related to this, the company has Memo No. 083/654/HC-UM/JMS/I/2022 dated January, 3 2022 regarding wages of daily worker and Memo No. 095/666/HC-UM/JMS/I/2022 dated January, 3 2022 regarding wages of permanent workers. Regarding wages structures its became non conformity on indicator 2.1.1

Based on the results of verification of the wages of workers with the same scope of work and the same length of work for August 2022, for example, harvest workers with employ number 41191 and employ number 41216 (with 7 years of service) it is known that workers have the same basic of wage which amount Rp. 3,199,654.80.

Status: Comply

6.2

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

6.2.1

The company shows several documents related to the implementation of wages at PT JMS, including:

- Governor of East Kalimantan Decree No. 561/K.598/2021 dated 30 November 2021 concerning Determination of the Minimum Wage for Kutai Kartanegara Regency, East Kalimantan Province for 2022 in the amount of IDR 3,199,654.80 per month.
- Decree No. 083/654/HC-UM/JMS/I/2022 concerning Wages for Daily Workers in Kutai Kartanegara Regency East Kalimantan Region for 2022 dated January 3 2022. PT JMS Daily Freelance Wages in the amount of IDR 3,199,654.80 per month or IDR 127,986.19 per day.
- Decree No. 095/666/HC-UM/JMS/I/2022 concerning SKU-H wages for East Kutai Kartanegara Regency for 2022 dated January 3, 2022. PT JMS SKU-H wages amount to IDR 3,199,654.80 and are provided with a rice allowance of 15 kg for employees, 9 kg for a non-working wife, 7.5 kg for 1 child, a maximum of 3 people
- The company shows PT JMS's 2022 Wage Structure Decree dated January 3, 2022 with the lowest wage for grade G amounting to IDR 3,19,654.80 and the highest for grade A amounting to IDR 4,979,654.80

Regarding work requirements, the company also has SOP Time Management Number SOP-HC-005 version 2 dated March 6 2019 which explains the presence and absence of workers. Apart from that, the company regulations have also explained work requirements such as working time, working days, wage system and others.

6.2.2

The company already has documents that regulate wages and working conditions contained in the following documents, among others:

- SOP Time Management Number SOP-HC-005 version 2 dated 6 March 2019 which explains the presence and absence of workers such as annual leave, rest rights, maternity leave, permission to leave work and others.
- Company regulations that explain work requirements such as working hours, working days, wage system and others.

However, based on field observations and interview with workers obtained information's:

- The results of interviews with plantation workers such as harvester, manuring workers, spraying workers, workshop workers and factory workers obtained information that there were no salary slips / wage documentation given to workers. This is not in accordance with PP No. 36 of 2021 which explains that employers are required to provide proof of payment of wages which contains details of wages received by workers when wages are paid.
- The results of interviews with daily workers, for example for harvesting, spraying, spraying activities at JMSE, GHRE, BKRE, ASNE, FFB loaders at ASNE and workshop workers at BKRE obtained information that workers have never signed a work agreement with the company.

Based on the explanation above, it is concluded that:

- There is not enough evidence yet that all workers have work agreements.
- There is not enough evidence that the company has provided payslips / salary breakdown documentation that provides accurate information regarding compensation for work performed.
- The company has not been able to show evidence of payslips/wages documentation for some workers, for example workers with the initials HMS, ZND, MW, KT at JMSE and NS, FR, MJ at GHRE.

Based on that's explanations it became non conformity No 2022.12 with major category

6.2.3

Based on field observations and interview with workers obtained information's:

Daycare worker

- The results of interviews with workers at the Daycare in Bangkirai Estate obtained information that workers came to work at 5.30 in the morning and only returned to work at 5 or 6 in the afternoon.
- The results of verification of attendance documents in August and September 2022 show that workers return home on average at 5 o'clock.
- The results of verification of wage slips for August and September 2022 show that the Daycare workers only receive a basic wage according to the minimum wage.

Security

- The results of verifying the security overtime recap document with employee number 08013 in September 2022, it is known that the security has 3 days off (Off) on the 11th, 18th and 25th. As for holidays in September 2022 it is known that there are 4 days off (4th, 11, 18, and 25) and 26 working days.
- The results of verification of pay slips and recap of security overtime note that workers work on off days/schedules (September 7th) but are counted as working days and not counted as working days on holidays.

Based on the explanation above, it is known that the company has not been able to show proof of legal compliance, especially the implementation of the overtime work mechanism. **Based on that's explanations it became non conformity No 2022.13 with major category**

6.2.4

The company has provided welfare facilities and infrastructure for workers in each work unit, such as:

- Housing area
- Daycare
- House of worship
- Clinic
- Ambulance
- Sports field
- And others.

The results of field observations in residential areas and interviews with workers and labor unions show that the company has provided workers with proper housing facilities/in good condition, such as houses, clean water facilities, religious facilities, sports facilities, clinics, electricity and others. The condition of the house is permanent and has good sanitation. From the results of the interviews it was also known that in each housing location there are daycare areas, trash bins and others.

Based on the explanation above, it can be concluded that the company has provided facilities and infrastructure for the welfare of workers in proper conditions and still functioning properly.

6.2.5

The results of interviews with employees and labor union, 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 Unit certification is based on the minimum wage in Kutai Kartanegara District based on the Decree of the Governor of Kalimantan Timur No. 561/K.598/202 on November 30, 2021. The Minimum Wage for Kutai Kartanegara District in 2022 is Rp. 3,199,654.80. Related to this, the company has Memo No. 083/654/HC-UM/JMS/II/2022 dated January, 3 2022 regarding wages of daily worker and Memo No. 095/666/HC-UM/JMS/II/2022 dated January, 3 2022 regarding wages of permanent workers.

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, water, electricity for home, medical facilities, school for workers children, etc. As for the prevailing wage value in 2022 is 3,758,792.

6.2.7

Based on documents verifications its was known:

- Results of verification of payroll documents for September 2022 which informed the list of workers, positions and status of workers, it was found that there were 992 harvester with daily worker status at PT JMS.
- Results of interviews with management, obtained information that permanent employment at PT JMS refers to Decree of GAPKI No. SK/002/PPG/II/2013 dated 8 February 2013 concerning the Activity Flow of the Work Implementation Process in the Oil Palm Plantation Business Sector stated that the main activities include harvesting and processing fruit into CPO.
- The company has shown records of daily worker appointments to SKU (permanent worker) for October 2022, which are explained as follows:
 - Decree of appointment of BKRE → with a total of 5 employees appointed.
 - Decree of appointment of GHRE → with a total of 3 employees appointed.

There is not yet sufficient evidence that all permanent work is not carried out by Temporary or Casual Daily Workers.

Based on that's explanations it became non conformity No 2022.14 with major category

6.2.2	Status: NC No. 2022.12 with Major Category
6.2.3	Status: NC No. 2022.13 with Major Category
6.2.7	Status: NC No. 2022.14 with Minor Category

6.3

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

6.3.1

The company has a policy regarding the formation of a workers' union which is listed in the Sustainability Policy document No. 7.9 which was approved by the President Director on 11 June 2018, in this policy it is explained regarding the company's commitment to giving workers the freedom to form a labor union. The company shows evidence of policy socialization, for example Policy socialization to employees on 31 October 2022.

As a form of policy implementation, a Worker's Union has been formed in the Company, which is shown through evidence of Registration, including:

- Registration of Labor Unions (PB SERBUNDO) from the Manpower and Transmigration Office of Kutai Kartanegara Regency No. B1350/Distransnaker/PHIJSTK.III/567/10/2019 dated 14 October 2019.
- Registration of Changes in the Board of Workers' Union (Serikat Pekerja Sawit Independent) from the Manpower and Transmigration Office of Kutai Kartanegara Regency No. 567/02/1.5.3/1/2017 dated 3 January 2017.

6.3.2

The company already has a labor union and has been registered with the relevant agencies, including:

- Registration of Labor Unions (PB SERBUNDO) from the Manpower and Transmigration Office of Kutai Kartanegara Regency No. B1350/Distransnaker/PHIJSTK.III/567/10/2019 dated 14 October 2019.
- Registration of Changes in the Board of Workers' Union (Serikat Pekerja Sawit Independent) from the Manpower and Transmigration Office of Kutai Kartanegara Regency No. 567/02/1.5.3/1/2017 dated 3 January 2017.

The company also shows documents of labor union meetings, such as:

- Minutes of the meeting between the Company and the labor union on 20 June 2022.
- Minutes of the meeting between the Company and the labor union on 4 June 2022.

6.3.3

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

Status: Comply

6.4
Children are not employed or exploited.
6.4.1

The company has a policy regarding child protection, which is listed in the Sustainability Policy dated 11 June 2018. In point 7.7 it is stated that forced labor or child labor will not be tolerated in any location belonging to the EHP Group. Company show evidence of policy socialization, for example:

- Socialization to Agung Baya Village which will be held on 3 May 2021.
- Socialization of policies to employees on 31 October 2022.

The results of verification of the labor list documents, interviews with internal and external stakeholders, and field observations revealed that there were no indications of workers under the age of 18.

Based on the above, it can be concluded that the unit of certification has implemented a policy regarding age requirements for workers.

6.4.2; 6.4.3

In terms of verifying the age requirements of prospective workers, the company requires a photocopy of the prospective worker's ID as one of the administrative requirements for recruiting workers to ensure that the prospective worker meets the minimum age as stipulated in Recruitment procedure No. SOP-HC-006.

The results of verification of the labor list documents, interviews with internal and external stakeholders, and field observations revealed that there were no indications of workers under the age of 18.

6.4.4

Company show evidence of policy socialization, for example:

- Socialization to Agung Baya Village which will be held on 3 May 2021.
- Socialization of policies to employees on 31 October 2022.

The results of interviews with internal and external stakeholders show that the company has provided socialization regarding the prohibition of child labour. Based on the results of field observations it is known that there is no indication of 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

The company has a policy stating that workers must be free from all forms of harassment, threats, abuse both physically and mentally from fellow workers or Plantation Business Actors, which are listed in the Sustainability Policy dated 11 June 2018. In point 7.8 it is stated that the EHP Group will not accept all forms of harassment, including sexual harassment or violence against its employees, namely giving unwanted comments or actions (or it should be known that such comments or actions will not be accepted) to the intended person.

The company shows evidence of dissemination of company policies including policies on preventing sexual harassment and violence, for example Socialization of policies to employees on 31 October 2022.

Based on the results of a review of complaint documents and interviews with workers, labor unions, the gender committee and the Manpower Office, it is known that there were no issues/complaints related to harassment, threats and abuse, both

physically and mentally from fellow workers or business actors.

6.5.2

The company has SOP Time Management Number SOP-HC-005 version 2 dated March 6 2019 which explains the presence and absence of employees such as annual leave, right to rest, maternity leave, leave due to miscarriage, permission to leave work and others. Apart from that, company regulations also explain reproductive rights such as maternity leave/miscarriage, menstrual leave and permission to breastfeed children.

Based on the results of interviews with labor unions and women workers, it is known that the company has granted women workers the right to rest and leave related to reproductive rights, such as maternity leave and menstrual leave according to applicable regulations.

6.5.3

Based on the results of the identification of young mothers conducted in August – September 2022, it is known that there were no new mothers or breastfeeding mothers at PT JMS. In addition, the results of interviews with female workers, representatives of the gender committee and interviews with paramedics during the audit showed that there were no new mothers giving birth or breastfeeding at PT JMS.

6.5.4

Company has complaint handling procedure for all parties and society number SOP-OTH-F3-019 dated 10 January 2019. The procedure states that the CH guarantees the security and confidentiality of reporter (whistleblower) and also attached a flow chart of the mechanism for handling complaints by all parties (stakeholders). Head of Section or Assistant accommodates & studies complaints/aspirations and reported to the unit manager. Complaints will be responded by the CH a maximum of 14 days from the date the complaint was received by the operational unit.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1

based on documents verifications, interview with managements it was known:

- The results of interview observations with harvest workers in block Y44 division 3 Bangkirai Estate with the initials ESP, it is known that the workers come from eastern Indonesia and have worked for 2 months. From the results of the interviews, information was obtained that the workers were recruited in the area of workers with AKAD status. However, from the interview results, information was also obtained that the worker's identity card (KTP) had been with the company since entering the company and had not been returned.
- Recruitment procedure No. SOP-HC-006 dated 9 February 2021 which explains that administrative documents for prospective workers are in the form of photocopies of ID, NPWP, family cards and others.

There is a withholding of workers' identity documents and there is not yet sufficient evidence that the implementation of the recruitment of workers from outside the area is in accordance with the existing procedures. **Based on that's explanations it became non conformity No 2022.15 with major category**

6.6.2

The company has a recruitment procedure No. SOP-HC-006 dated 9 February 2021 which explains that administrative documents for prospective workers are in the form of photocopies of ID, NPWP, family cards and others. The recruitment procedure also applies to the recruitment of permanent workers and workers with PKWT (Temporary) status. Based on the results of interviews with management, interviews with the Office of Manpower and labor unions, information was obtained that there were no PKWT (Temporary) or migrant workers at the company. As for the workers who work in the company, there are only workers with the status of permanent workers and casual workers.

6.6.1 Status: NC No. 2022.15 with Major Category

6.7

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

6.7.1

The person in charge of Occupational Safety and Health is identified as stated in the Decree of the Head of the Manpower and Transmigration Office of Kalimantan Timur Province Number Kep. 566/482/P2K3/PPK/DTKT/2021 concerning the Ratification of PT JMS OHS Committee, dated May 8, 2021, with the secretary of RDI (initials) who already has Decree of the Minister of Manpower of the Republic of Indonesia number 5/5243/AS.01.03/IV/2022 concerning the Appointment of General OHS Experts issued on April 28, 2022.

There are recordings of regular meetings between the person in charge and the workers, such as in the minutes of the meeting, including:

- July 12, 2022 in the BKRM meeting room which was attended by representatives of workers and representatives of management, which among others discussed evaluation of potential hazard in the work area.
- August 15, 2022 in the BKRM meeting room which was attended by representatives of workers and representatives of management, which among others discussed evaluation of potential hazard in the work area.
- September 14, 2022 in the BKRM meeting room which was attended by representatives of workers and representatives of management, which among others discussed evaluation of potential hazard in the work area.

On the other hand, there was a work accident in the majority category that occurred to harvest workers on July 20, 2022 but was not included in the discussion of the OHS I monthly meeting. This has become a non conformity which has been explained in indicator 3.6.2.

6.7.2

Procedures for emergency response and work accidents in Indonesian can be seen at :

- SOP-OTH-F3-006 concerning Investigation of Incidents, Accidents and Occupational Diseases Version 2.0 is effective from January 10, 2019.
- SOP-OTH-F3-01 on Prevention, Management and Recovery of Emergencies Version 2.0 is effective from January 10, 2019.
- SOP-OTH-F3-011 on Land and Building Fire Control Version 2.0 is effective from January 10, 2019.

There are workers assigned to the field and other work locations and have received First Aid Training (P3K), for example: Hariyanto, Ser No. 001/IV.04.01/DIKLAT/V/2022 dated May 23, 2022. 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 Eagle High Plantations Sustainability Policy explains that the person in charge appointed by the company has the role of overseeing all matters related to safety and health, including the provision of suitable and sufficient protective equipment. Regarding to sanitation activities in the rinse room, the company already has rinse room facilities for workers but does not yet have a mechanism/system related to washing in the rinse room.

- Results of Field Observations and Interviews:
 - **Bangkirai Estate**
 - Harvesters in Block Y44 Division 3 use boots that come from private purchases and do not use glasses as stated in the Hazard Identification and OHS Risk Assessment. The PPE provided was only in the form of a helmet.
 - Sprayer in Block W42 Division 2 use boots that come from personal purchases, use non-respirator masks and do not use goggles as stated in the Hazard Identification and K3 Risk Assessment. The PPE provided includes helmets, gloves, masks (non-respirators) and aprons.
 - Workshop workers use safety shoes that come from personal purchases because the PPE provided is boots.
 - **Angsana Estate**
 - Harvesters in Block T51 Division 2 use boots that come from private purchases and do not use glasses as stated in the Hazard Identification and OHS Risk Assessment. The PPE provided was only in the form of a helmet.
 - Sprayer in Block T51 Division 2 use boots that come from personal purchases, use non-respirator masks and do not use goggles as stated in the Hazard Identification and K3 Risk Assessment. The PPE provided

- includes helmets, gloves, masks (non-respirators) and aprons.
- Fertilizer employees in Block T51 Division 2 use boots that come from personal purchases. The PPE provided was in the form of helmets, rubber gloves, masks (Health) and aprons while boots were not provided by the company. The masks used are not in accordance with the Hazard Identification and Risk Assessment documents.
- Based on the results of interviews with the management unit, it is known that there are 10 spray employees at Angsana Estate, but there are 5 workers currently working in the field. Based on the observation results, there was no PPE for 5 workers who were not on duty and there were no clean clothes stored for workers in the field. In line with this matter, based on interviews with spray workers it is known that workers go straight to the workers' homes and bring PPE back home.
- **Jati Mas Estate**
 - Harvesters in Block M58 Division 1 use boots that come from private purchases. The PPE provided is in the form of helmets and goggles.
 - Spray employees in Block L57 Division 1 use boots that come from personal purchases and use non-respirator masks (not in accordance with the Hazard Identification and OHS Risk Assessment). The PPE provided includes helmets, gloves, masks (non-respirators), goggles and aprons.
 - Fertilizer employees in Block J75 Division 3 use boots that come from personal purchases because the PPE provided is in the form of helmets, rubber gloves and aprons while the boots are not provided by the company.
- **Gaharu Estate**
 - Harvesters in Block 76 Division 1 use boots that come from private purchases and do not use glasses as stated in the OHS Hazard Identification and Risk Assessment.
 - Fertilizer employees in Block D77 Division 1 have been given PPE in the form of helmets, rubber gloves, masks and aprons. However, there are no glasses for fertilizer workers according to the results of the risk identification they have.

Based on the description above, the company has not been able to show enough evidence that workers use Personal Protective Equipment (PPE) that is in accordance with the results of the OHS Hazard Identification and Risk Assessment provided by the company as well as the implementation of the washing mechanism in the rinse room. **Based on that's explanations it became non conformity No 2022.16 with major category**

6.7.4

- PT JMS Company Regulations for the 2018-2020 period, Article 18 concerning Health Care Insurance paragraph 1 explains that the Company includes employees and their families as members of Health Social Security referring to RI Law No. 24 of 2011 concerning BPJS Health and its implementing regulations.
- Companies can show documents for the number of employees for the October 2022 period, including:
 - Bangkirai Mill: 124 workers.
 - Angsana Estate: 466 workers.
 - Bangkirai Estate: 495 workers.
 - Gaharu Estate: 437 workers.
 - Jatimas Estate: 484 workers.
 - Kulim Estate: 272 workers.
 - Trembesi Estate: 283 workers.
- Companies can show billing statements for payment of BPJS Health Insurance PT JMS for the October 2022 period for a total of 675 workers with a total of 1,362 dependents.
- Companies can show PT JMS Employment BPJS payments for the September period, including:
 - Billing statements for the Bangkirai Mill unit totaling 116 workers.
 - Billing statements for the Angsana Estate unit totaling 188 workers.
 - Billing statements for the Bangkirai Estate unit totaling 208 workers.
 - Billing statements for the Gaharu Estate unit totaling 229 workers.
 - Billing statements for the Jatimas Estate unit totaling 224 workers.
 - Billing statements for the Kulim Estate unit totaling 133 workers.
 - Billing statement for the Trembesi Estate unit totaling 114 workers.

- The company has provided a folder containing information on proof of payment for BPJS Health and BPJS Employment Insurance ahead of the closing audit activity, but the file provided cannot be opened by the auditor.
- Based on the results of field observations and interviews at Bangkirai Estate, Angsana Estate, Jati Mas Estate and Gaharu Estate, it is known that there are workers who have not received BPJS Health and Employment Insurance facilities.

Based on the description above, the company has not been able to show enough evidence that all workers have received BPJS Health and BPJS Employment Insurance facilities. **Based on that's explanations it became non conformity No 2022.17 with minor category**

6.7.5

The company shows the FR and SR for the period January – October 2022, which are briefly explained as follows:

- Total worker: 1,889
- Fatality: 1
- Majority: 22
- Minor accident: 32
- Lost Time Injury: 124
- Frequency Rate: 4.23
- Severity Rate: 22.81

Related to information on work accident incidents, there is a record of non-compliance with work accident incidents as explained in indicator 3.6.2.

6.7.3 Status: NC No. 2022.16 with Major Category

6.7.4 Status: NC No. 2022.17 with Minor Category

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

7.1

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

7.1.1

The company already has pest and disease monitoring and control procedures as stated in the Agronomy Technical Guide no. Document: MAN-UOM-001 Chapter 7 about Pests and Diseases. This SOP explains that pest control must be based on the concept of Integrated Pest Management (IPM). Pest control uses a holistic or comprehensive approach by combining ecological, biological, physical and chemical approaches. Chemical control as a last step or in the event of an uncontrolled pest population explosion. In applying the integrated pest concept, early detection is the most important basis. This SOP also explains that the critical threshold can be defined as the average population level of healthy larvae per midrib, at which control measures must be taken in populations above this average. Critical thresholds for controlling pests and diseases are as follows:

- The critical threshold for leaf-eating caterpillars is 10 heads/midrib from the observed sample.
- The critical threshold for rat is 5% of the observed sample.
- The critical threshold for termite is 4 trees/ha from the observed sample.

The company has shown records related to the recapitulation of the census of ganoderma, termites and rat. The records related to the results of the census is census of rat carried out in Block U44 Division 2 Bangkirai Estate with an attack rate of 7.14% (above the critical threshold). Meanwhile, there were no other pest attacks such as termites, caterpillars, and oryctes.

Based on the results of the field visit, it was found that there were rat infestations on the Bangkirai Estate but the still below economic 50enstrual. Based on verification of controlling rat attack's document, the company installed barn owl and used pesticides (racumin) for up to 3 rotations.

The company has tried to conduct biological control to suppress pest population diseases, such as planting and maintaining beneficial plants to suppress netter caterpillars, installing burn owl boxes and monitoring owls to suppress rat pest populations. In addition, the company has also utilized beneficial plants at PT Jaya Mandiri Sukses, among others: the company filled up *urnera subulata*, *cassia cobanensis*, and *antigonon leptopus*.

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 the results of interviews with management, it is known that there is no use of fire for pest control.

Status: Comply

7.2

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

7.2.1; 7.2.2; 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 internal memo from the Head of Applied Research & Technical Services number: 5.023/ARTS-COO/RSPO/Herbicide/III/20 dated March 9, 2020 regarding herbicides to replace the active ingredient 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 leptopus*. Moreover, the company has also conducted early detection routinely listed in the monthly report of early warning system.

The company can show records of pesticide use in 2021 – 2022 for all Estate units, for example the use of pesticides in BKRE units as follows:

Pesticide	Active Ingredient	Unit	2020	2021	2022
Gramoxone	Paraquat	Lt	605	293	375
Kleen Up	Glifosat	Lt	271	965	1,074
Metafuron	Metil metsulfuron	Lt	38	61	74
Garlon	Triklopir	Lt	41	48	54
Matador	Lamda sihalotrin	Lt	-	-	16
Racumin	Kumatetralil	Lt	-	-	447

Based on the explanation above, it is concluded that there is a reduction in the use of pesticides, especially for paraquat used. The increase in the use of glifosat is due to a logical consequence of reducing the use of contact pesticides.

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 verification of pesticide use documents, it is known that the management unit used pesticide with the active ingredient paraquat. In period 2020-2022, it is known that there is a decreasing trend in its application. Based on the results of interviews with the management unit, it was known that the company used paraquat because it is to

pursue maintenance rotation which has been delayed due to budget adjustments related to financial constraints experienced by the company in recent years.

7.2.6; 7.2.7

The company already has procedures for handling chemicals as stated in the Agronomy Technical Guidelines No. Document: MAN-UOM-001 Chapter 8 on the use of chemicals that describes the mechanism of storage, handling and mixing of chemicals as well as first aid in poisoning.

Based on the review of pesticide use recapitulation documents, it is known that the company has used registered pesticides and there is limited use of pesticides. Company evidence of limited pesticide applicator training, including:

- Initial SVT Number: 861/94/KPPP/IX/2016 has attended Training on the Use of Limited Pesticides by the Fertilizer and Pesticide Control Commission of East Kalimantan Province on 17 September 2013.
- Initial MFA Number: 861/94/KPPP/IX/2016 has attended Training on the Use of Limited Pesticides by the Fertilizer and Pesticide Control Commission of East Kalimantan Province on 17 September 2013.
- Initial RPI Number: 861/94/KPPP/IX/2016 has attended Training on the Use of Limited Pesticides by the Fertilizer and Pesticide Control Commission of East Kalimantan Province on 17 September 2013.
- Initial PLA Number: 861/94/KPPP/IX/2016 has attended Training on the Use of Limited Pesticides by the Fertilizer and Pesticide Control Commission of East Kalimantan Province on 17 September 2013.

Based on field visits to rinse houses and hazardous and toxic warehouses, it was found that there are product labels and MSDS in Indonesian for each chemical and the placement of chemicals has been arranged based on the trade name and type of chemical. Furthermore, the rinse house also has PPE and sanitation facilities for chemical applicators such as bathrooms, washing areas and clotheslines.

7.2.8

The company can show the identification document of waste resulting from operational activities contained in the document SOP-OTH-F3-004 version 2.0, effective date 10 January 2019. The SOP describes the pesticide storage mechanism that is carried out according to the recommendations provided in the MSDS, placement of materials chemicals that have dissimilar characteristics must be separated according to MSDS recommendations, preparation and release of chemicals is carried out first in first out, chemical containers must have labels, chemicals are only issued on request approved by the authorities and record storage and release well-documented agrochemicals (including pesticides). The company has also conducted socialization to employees regarding the prohibition on the use of hazardous waste packaging including used pesticide packaging on June 27-28, 2022.

The Used pesticide packages classified as Hazardous Waste were also found stored in a well-monitored Hazardous Waste storage warehouse which was then transported to licensed collectors such as, the last transported on 21 May 2022 from Bangkirai Estate is 0,015 ton with manifest number KLHK-1655037232.

7.2.9

Based on a review of documents and interviews with surrounding village and workers sighted that the company did not perform the application of pesticides from the air.

7.2.10

The last medical examination carried out for pesticide and chemical handlers was carried out on June 17-20, 2022 for 9 workers related to chemicals in PT Jaya Mandiri Sukses. Based on the results of field observations and interviews with spray workers in Block W42, Division 2, Bangkirai Estate, it is known that there are spray workers with the initials BLF and VCO who have not received special medical examination facilities. This has become a record of non-compliance which has been explained in indicator 3.6.2.

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.

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 shows identification of waste sources for the 2022 period with details: ex sacks of fertilizer, inner plastic of fertilizer sack, used oil from generator, used neon/lights, wastewater, EFB, Shell, fiber, dash of incinerator, dash of boiler, domestic waste, paper and others. Sources of emissions include:

- CO2 Gas: Transportation of FFB, CPO Shipping, Operation of heavy equipment, operation of generator & electric pumps, management of WTP, boilers, laboratory activities, waste ponds and Mill processes.
- Gas NO2 & SO2: Activities in the laboratory.
- Gas CH4: Fertilizing activities and WWTP ponds.

Solid Waste

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

Domestic Waste

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

Hazardous and Toxic Waste

The company has a SOP for the management of hazardous and toxic waste with document number SOP-OTH-F3-004: Waste Management and Monitoring version 2.0, which became effective on January 10, 2019, and signed in the approval form by the CEO, Director Sustainability, COO, Head-Estate, & Head-Mill. The hazardous and toxic materials referred to include: waste from the use of chemicals and toxic, used light bulbs, waste from the use of oil, waste from using batteries, waste from using used filters, medical waste, cloth rags, waste from chemical packaging, and all chemicals contained in plantation and factory activities.

The company has shown proof of delivery to licensed carriers and collectors, namely PT Sumber Agung Srimarti with transportation using vehicle No. KT 8622 BF, hazardous and toxic waste materials have been the last delivered from the following units for example:

- Medical waste as much 0.0008 ton with Manifest KLHK-1655544603 dated 25 May 2022.
- Used hazardous container as much 0,015 ton with Manifest KLHK-1655037232 dated 21 May 2022.
- Used lubricant as much as 0.18 ton with Manifest KLHK-1655036840 dated 14 April 2022.
- Used battery as much as 0.0020 ton with Manifest KLHK-1655037393 dated 21 May 2022.

7.3.2

The company has identified the source of waste and pollution source and treat the identified source to reduce emission and pollution. The effort taken by the company are:

- Shell and fiber are reused for engine fuel of boiler. It reduces the carbon emission from the combustion of fossil fuel.
- POME use for fertilizer, based on field visit the condition of flatbed has been maintenance well and no environmental pollution potential.
- The managing for clinical waste, the company also has cooperation with licensed parties such as PT Sumber Agung Srimarti.
- Empty fruit bunch is applied to estate plantation area to substitute chemical fertilizer. Based on field visit EFB storage on Bangkirai POM, EFB is experiencing a buildup of this due to high rainfall in 2022 and limited manpower so that EFB applications experience problems in the field. In this regard, the company presented the EFB application program for 2022, and based on the EFB application program in December 2022, it is planned that all EFB will have been

applied to the field. Based on the results of the field visit, the company has made drainage to prevent the leachate generated from EFB piles from being released into the environment.

Based on the results of interviews with representatives of workers and managers, information was obtained that they understood the waste management plan in each work area.

Domestic waste

- SOP number OTH-F3-04-03: Management and monitoring of solid domestic waste which explains that the transport of domestic waste is carried out 2 times a week to the final landfill, it is not justified to dispose of waste in any place and do not incinerate waste.

Based on the results of field visits in several locations, for example:

- Domestic waste at the security post at the Bangkirai Estate guest houses is disposed of and burned around the post.
- Domestic waste is disposed of in a residential area at Bangkirai Estate.
- There are traces of burning garbage beside to the employees' housing in Jatimas Estate.
- There are traces of burning garbage beside to the employees' housing at Angsana Estate.

Hazardous waste

- IK-OTH-F3-04-01: Management and monitoring of hazardous waste explains that hazardous waste Used batteries, used oil, used folter, used rags, used TL lamps are stored in hazardous storage for hazardous waste and then transported by transporters licensed by the government. Management of hazardous contaminated packaging, used pesticide chemical packaging and used POM water chemical packaging, namely washing 3 times in a special washing place.

Based on the results of field visits in several locations, for example:

- Discarded used fertilizer sacks (inner) next to the fertilizer warehouse at Angsana Estate.
- Several types of hazardous waste, for example, used oil drums, used oil, used batteries, used grease buckets in the former Angsana Estate workshop area.
- Used packaging of Kleenup and Gramoxone pesticides in the civil engineering (CE) work area at Angana Estate.
- Utilization of used POM chemical packaging as a place for equipment for the Bangkirai POM WWTP operator.
- 6 PCS of used oil packaging (drums) at the Jatimas Estate oil warehouse.

The company has not been able to show sufficient evidence that the management of hazardous waste and domestic solid waste is in accordance with procedures and is fully understood by all workers and managers. **Based on that's explanations it became non conformity No 2022.18 with minor category**

7.3.3

Based on the results of field visits to the Bangkirai POM area, information can be obtained that it is known that there is no open burning of waste for solid waste types such as EFB, hazardous waste, fiber and shell. However, open burning of domestic waste has become a non-compliance with indicator 7.3.2.

7.3.2	Status: NC No. 2022.18 with Minor Category
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7.4

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

7.4.1; 7.4.4

The company has agronomic technical guidelines with the number MAN-UOM-001 ver.1 effective January 2019 chapter 6 explaining fertilization based on the results of soil and leaf analysis. The company shown the program and the realization of fertilization application for period January until December 2022 which refers to the recommendation for fertilization in 2022. The recommendation for fertilization is based on the results of the leaf analysis and soil analysis from the previous year. The 2021-2022 Fertilization Recommendation and Realization report at PT JMS as an example for the Bangkirai Estate unit, including:

No	Type of Fertilizer	Recommendations		Realizations	
		2021	2022	2021	2022
1	NPK	736,95	736,95	1.010,57	613,25
2	RP	-	294,60	-	25,67
3	Kieserite	-	63,25	-	-
4	S. Dolomite	-	262,85	-	-
5	Zn	-	20,48	-	-
6	Urea	451,05	357,25	443,41	312,79
7	MOP	354,15	363,60	-	274,64

Based on documents review it was known there are several type of fertilizer didn't applied are not accordance with recommendations, based on interview with managements its due to stock of fertilizer and company financial.

7.4.2

To find out the soil fertility, the company conducting of soil and leaf analysis periodically, for example:

- **Soil Analysis Activities** – Laboratory analysis about the condition and soil nutrient content in the soil samples to determine the fertilizer recommendation in maintaining and improving the balance of nutrients in the soil. Parameters measured among others: acidity (pH), moisture, content of C-org, C/N ratio, N, P, Al and H. The last soil sample analysis was carried out by Laboratory of EHP's Central Research on March 6, 2019 with total sample is 68 units.
- **Leaf Analysis Activities** – The results of leaf analysis annually published the recommendations of fertilizer dosage to produce the optimal palm fruit. The principle of fertilization is the provision of treatment on the soil to produce the nutrients required by the palm oil with optimum results. Indicator Major elements namely N, P, K, Ca and Mg and Indicator Minor elements namely B and Cu. Foliar Analysis was carried out by Laboratory of EHP's Central Research on November 23, 2021 with total sample is 52 units.
- **Visual Analysis Activities** – Visual observations performed every year at the time of leaf analysis activities. Visual observation is a consideration in determining the fertilizer recommendations, deficiency of nutrients and analyse the potential of disease which is likely to become endemic of a particular disease.

The result of soil and leaf analysis published recommendations for fertilizer doses to produce optimal production of palm fruit. Principles of fertilization are giving treatment on the ground to produce the nutrients required by palm and generating optimal results.

7.4.3

Companies can show records of the use of organic materials as a nutrient recycling strategy. For example, the application of compost for the period of December 2021 – November 2022 is 13,702.70 tons and pome used in period October 2022 is 22,767 m³. Overall, the company has made efforts to maintain and improve soil fertility. The company also has not carried out replanting activities, so there was no use of the palm residue after replanting.

Status: Comply

7.5

Practices 55enstrua and control erosion and degradation of soils.

7.5.1; 7.5.2: 7.5.3

Semi-Detailed Soil Map and Peat Distribution and Depth Map in the PT JMS Area, scale 1:100,000 are included in the drainability assessment report, dated November 8, 2022 conducted by PT Shakaro Indoraya Lestari. The document states that there are 5,168.65 ha of peat land or 35.3% of the total area. PT JMS is located in Kutai Kartanegara Regency at an altitude of 0-50 meters above sea level. The terrain of the estate is generally flat to undulating.

The soil are dominantly mineral material as result of the from mainly depending on the degree of illuviation and eluviation process (Entisol, Ultisols and Inceptisol). In addition, there is also a peat depth map which divides the depth into 4 category, including peat depth of 50-100 cm covering an area of 824.89 ha, peat depth of 100-200 cm covering an area of 1,039.24 ha, peat depth of 200-300 cm covering an area of 480.04 ha and peat depth of > 300 cm covering an area of 2,824.48 ha.

Based on document verification sighted that the oldest oil palm planted year is year of 2006. Therefore interview result sighted that the replanting activity will be conducted on 2031. Based on field observation and interview with stakeholders sighted that there are no new development during period of 2006 to 2015.

Status: Comply

7.6

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

7.6.1; 7.6.2

Semi-Detailed Soil Map and Peat Distribution and Depth Map in the PT JMS Area, scale 1:100,000 are included in the drainability assessment report, dated November 8, 2022 conducted by PT Shakaro Indoraya Lestari. The document states that there are 5,168.65 ha of peat land or 35.3% of the total area. PT JMS is located in Kutai Kartanegara Regency at an altitude of 0-50 meters above sea level. The terrain of the estate is generally flat to undulating.

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Based on the results of interviews and a review of the area statement documents, it was found that the company did not develop new plantations.

7.6.3

The existence of a land map containing information on soil classification, texture, drainage, limiting factors and information on suitability for oil palm plantation development has helped the company to organize blocks, roads, drainage, bridges, etc. The company also has a road maintenance program which is equipped with adequate infrastructure and facilities to carry out the work. According to the results of the field visits, the roads are in good condition and the harvested FFB is transported smoothly to the mills. Oil palm in the operational area is the first cycle, not replanting or new planting activities.

Status: Comply

7.7

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

7.7.1

Semi-Detailed Soil Map and Peat Distribution and Depth Map in the PT JMS Area, scale 1:100,000 are included in the drainability assessment report, dated November 8, 2022 conducted by PT Shakaro Indoraya Lestari. The document states that there are 5,168.65 ha of peat land or 35.3% of the total area, which divides the depth into 4 category, including peat depth of 50-100 cm covering an area of 824.89 ha, peat depth of 100-200 cm covering an area of 1,039.24 ha, peat depth of 200-300 cm covering an area of 480.04 ha and peat depth of > 300 cm covering an area of 2,824.48 ha.

Based on the planting year distribution document, it is known that the youngest palm age is 2015, after that there is no expansion area for the development of new planting.

7.7.2

Results of interviews with representatives of the management unit revealed that the basis for determining reporting of peat inventory to the RSPO refers to the Soil and Land Suitability Map of PT Jaya Mandiri Sukses.

- Companies can show proof of peat inventory reporting to RSPO via email on March 12, 2020. The area of planted peat is 4,346 Ha, the peat rehabilitation area is 1,085 Ha and other areas are 32 Ha, so the total reported peat area is 5,463 Ha.
- Based on the verification results of PT Jaya Mandiri Sukses's Land and Land Suitability Map documents, scale 1: 120,000 for the period March 2012, it is known that the total peat area of PT Jaya Mandiri Sukses is 5,403.64 with

details of peat depth <1.5 m covering an area of 238.38 Ha, peat depth of 1.5 – 3 m covering an area of 1,714.76 Ha and peat depth > 3 m covering an area of 3,450.50 Ha.

Based on the description above, the company has not been able to show that the peat inventory reported to the RSPO is in accordance with PT Jaya Mandiri Sukses's Soil and Land Suitability Map scale 1: 120,000 for the period March 2012.

Based on that's explanations it became non conformity No 2022.19 with Minor category

7.7.3

The company shows monitoring records of peat subsidence as part of planting oil palm on peatlands, for example the monitoring results of peat subsidence in the period January to October 2022, which briefly explained that there were 2 monitoring points, namely Block H-57 Trembesi Estate and Block G-62 Gaharu Estate, with subsidence rate of 1 cm. This is supported by the results of field observations in the two blocks which explain a subsidence rate of 1 cm in the last 1 year.

7.7.4

- SOP-OTH-F3-014 concerning Management and Monitoring of Peatlands effective January 10 2019 at point 3.2 concerning Arrangements for Drainage and Water Management, specifically at point 3.2.3 it is explained that a high water level can be maintained at a position of 40 cm (forty centimeters) up to 50 cm (fifty centimeters) from the ground surface. The procedure explains that management must ensure that there are sufficient dams, drempel, drainage blocks and 57enstrual in each canal as needed and the high water level can be maintained at a position of 40 cm to 50 cm calculated from the ground surface.
- Based on the results of a review of piezometer monitoring documents for the period January – October 2022 at Gaharu Estate, it is known that the piezometers in blocks E62 and F62 have an average water level that is maintained respectively of 103 cm and 93 cm.
- Based on the results of field observations and interviews with the management unit, it is known that the company does not yet have a water gate. Currently what is installed in the field is a stop block/bund to regulate water management.

Based on the description above, unit management cannot demonstrate the implementation of peat management in accordance with procedures and/or applicable regulations. **Based on that's explanations it became non conformity No 2022.20 with Major category**

7.7.5

The representative of the certification unit explained that based on the area statement document, the age of the oldest oil palm was still 16 years (2006 planting year) so there is no replanting plan. On the other hand, the company has carried out a drainability assessment, dated November 8, 2022 conducted by PT Shakaro Indoraya Lestari which has been submitted to the RSPO secretariat.

7.7.6

Plantation managers have adopted peat management in accordance with applicable regulation in Indonesia, such as measuring the rate of subsidence as described in Indicator 7.7.3 but there are still notes on the field drainage system, as well as monitoring water levels and groundwater levels which are explained in indicator 7.7.4.

7.7.7

There is no new land clearing on peat areas in PT Jaya Mandiri Sukses areas.

7.7.2	Status: NC No. 2022.19 with Minor Category
7.7.4	Status: NC No. 2022.20 with Major Category

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The company already has a water management plan and has implemented the water management plan period 2022-2027 which consists of:

- Inventory of location and area and mapped according to the stipulated size of riparian.
- Marking the riparian area by putting red paint on the palm stems which are the boundaries of oil palm plantations where plantation activities are not permitted.
- Planting Vertiver and legume crops (controlled) and inserting intercroppings on riparian whose vegetation has been converted to oil palm plantations.
- Do not apply chemicals in 58enstrua.
- Not disposing of POME into rivers but reusing it on plantation land. Before being used, liquid waste is first managed at the WWTP so that its quality meets the standards set by the government.
- Utilizing water for factory processing in accordance with the standards set by the company.
- The conducting river water quality testing and monitoring wells.

In addition, the company has a riparian management plan that is included in the HCV management plan, including:

- Socialization of HCV and environment to the community.
- Rehabilitation of HCV.
- HCV (riparian) patrols.
- Maintenance of HCV sign boards.

The company demonstrated a surface water quality monitoring program, including a surface water quality test report conducted by a KAN-accredited laboratory (KAN-013-IDN accreditation number), testing was carried out at 14 sampling points (inlet, middle and outlet). The last test was carried out on February 25 2022. As an example of the results of surface water quality testing as follows:

No	Parameters	Unit	Result				Threshold
			Inlet POM River	Outlet POM River	Inlet Kelumpang River	Outlet kelumpang River	
Physics							
1	Temperature	°C	27	27	29	30	± 3
2	Dissolved residue	mg/L	78	37	28	29	1000
3	Suspended residue	mg/L	13	41	21	21	50
Organic Chemistry							
4	pH		6,2	4,7	6,8	5,1	6 – 9
5	BOD	mg/L	1,6	1,5	1,6	1,8	3
6	COD	mg/L	8	7,7	7,5	8,2	25
7	Dissolved oxygen (DO)	mg/L	6,7	6,0	7,7	6,8	Minimum 4
8	Sulfat	mg/L	24	28	8	14	300
9	CL	mg/L	17	6	4	5	300
10	Nitrat	mg/L	5,2	5	0,6	4,9	10
11	Nitrit	mg/L	0,03	0,02	<0,010	<0,010	0,06

Regulation Number. 82 of 2001 concerning Class II Water Quality Standards.

From the results of the tests carried out, it is known that the pH value in the outlet area has decreased to tend to be acidic, several efforts that have been made by management include:

- Carry out maintenance (water treatment pond) and sand filters before flowing to the employee housing processing plant.
- Maintain the cleanliness of the environment around water sources so that pollutant sources can be minimized, for example not throwing garbage in rivers/reservoirs/canals.
- Create a gradual and periodic program to improve the quality of clean water, such as the program to construct drilled wells.
- Carry out periodic testing in accordance with the provisions of the applicable law.
- Report the results of the inspection in accordance with the provisions of the applicable law.

7.8.2

Based on document verification, PT JMS has a topographical map and also a river Distribution Map in the form of a Contour Map and a river distribution Map each with a scale of 1: 150,000, which depicts the contour lines and locations of the distribution of rivers in the operational area and around it. Based on the map, there are 5 rivers that pass through the PT JMS area, namely: Perian River, Jarum river, Keham river, Kedang Renik river and Klumpang river.

Based on the results of a field visit to the Kendang Renik river, block H8 Gaharu estate, it was found that there were no indications of traces of chemical application on the riverbank. In addition, in the riparian areas, woody plants such as Pulau (*Alstonia scholaris*) have been planted, Terap (*Artocarpus elasticus*), Banyan (*Ficus benyamina*) and Medang (*Actinodaphne borneensis*).

While water sources such as reservoirs, based on the results of field visits in the POM reservoir riparian conservation area, information was obtained that there were no HCV area boundaries on the reservoir's riparian, that the application of chemical pesticides was also found in that area. This has become a Non-Conformity with indicator 7.12.4 with the major category.

7.8.3

The company has carried out periodic monitoring of the quality of mill effluent in accordance with applicable regulations. The results of testing the quality of wastewater for the period January 2021 – October 2022 where the pH and BOD parameters were still below the quality standard (KepmenLH No 29-year 2003 and local regulation Kalimantan Timur Number: 02 Year 2011 Appendix 1.35 (Quality Standards for POME).

The company already has a permit to utilize wastewater to the ground for application to soil in accordance with the Decree of Regent of Kutai Kartanegara number 660.1/80/B-II/BLHD/2015 on June 8, 2015 (no validity period) as long as there is no change in operational activities the permit is still valid. Based on the results of interviews with the Kutai Kartanegara Regency Environmental Service, information was obtained that the company already has a license to utilize POME on land (land application) and is still valid if there is no change in operational activities.

Based on the results of the WWTP field visit, information was obtained that the flowmeter was still functioning properly, besides that there was also no indication of an overflow of waste that could potentially pollute the environment. The results of the field visit of the Land Application block W38 division 1 of the Bangkirai estate also show that the flatbed is still within normal limits, the location for the drainage is in accordance with the stipulations in the permit and there is no potential for environmental pollution.

7.8.4

The company recorded its actual water use. The average water uses per tons FFB for a period of January 2021 – April 2022 1.48 m3/ton FFB, while the budget for water consumption for the period 2021-2021 is 2.00 m3/ton FFB.

The company has a water resource exploitation permit for Bangkirai POM issued by the Ministry of Public Works and People's Enterprises based on decision letter number 245.8/KPTS/M/2018 dated 19 March 2018 which is valid for 5 years.

The company routinely pays surface water tax every month. The auditor has verified proof of payment of surface water tax from May 2021 to August 2022. The last proof of payment was in August 2022 to the UPTD Regional Revenue Agency for the Kutai Kartanegara Region for total water usage of 44,449 M3 (August 2022) which was paid on 1 September 2022.

Status: Comply

7.9

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

7.9.1

The plan to increase the efficiency of using fossil fuels and to optimize the use of renewable energy by companies is to use shells and fiber as boiler fuel which is used to generate turbines to generate electricity. The use of energy generated

from the turbine is monitored every day.

The company already maximizing the use of renewable energy (fiber & shell) as boiler fuel. For example, use of shells and fiber period January to December 2021 Bangkirai POM has produces 1,122,643 kWh of electricity from turbine. Renewable energy use per ton of palm product in the mill is 11.98 kwh / ton CPO. Result Direct fossil fuel used is 0.13 kWh/ ton CPO.

Status: Comply

7.10

Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to 60enstrua GHG emissions.

7.10.1

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

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

Fossil fuel reducing on Bangkirai POM have been implemented by fiber/shell usage for boiler. POME has been monitored every months and monitoring periods January 2021 to October 2022 shown that all of waste water testing parameters is compliant to the standards quality.

Based on document review for examples: pesticides usages monitoring, diesel fuel monitoring, HCV identification and etc found that accurate data has been put into the RSPO palm GHG Calculator. Summary of net GHG emissions from PalmGHG calculator of the audit report which calculation option is applied "Apply full Version".

The calculation of GHG and its monitoring has conducted by EHS department. GHG emission calculated using RSPO palm GHG calculator 4.0 Summary of GHG emission for Bangkirai POM and its supply base are listed as follows:

Emissions per product	tCO2e/tProduct
CPO	9.42
PK	9.42

Production	t/yr
FFB processed	227,512
CPO produced	52254
PK produced	8490

Extraction	%
OER	22.97
KER	3.73

Land use	Ha
Planted area on mineral	11910.45
Planted on peat	8649.15
Total area planted	20559.60
Conservation Area (Forested)	370.80
Conservation Area (Non-Forested)	0

FFB Production per hectare 11.07

Summary of field emission and Sinks

Description	Own crop		Group		3 rd	Total
Emissions Sources	tCO ₂ e	tCO ₂ e/tFFB	tCO ₂ e	tCO ₂ e/tFFB	tCO ₂ e	
Land conversion	105225.90	0.62	48426.99	1.32	0	153652.89
CO ₂ emissions from fertilizer	887.58	0.01	105.57	0.00	0	993.15
NO ₂ emissions from peat	47339.65	0.28	17405.89	0.48	0	64745.54
NO ₂ from Fertilizer	517.00	0.00	85.55	0.00	0	602.54
Fuel consumption	2533.72	0.01	1257.78	0.03	0	3791.50
Peat oxidation	345288.28	2.04	126955.99	3.47	0	472244.27
Sinks						
Crop sequestration	-	-	-	-	0	-
	128779.00	-0.76	-63694.51	-1.74	0	-192473.51
Sequestration in Conservation area	-86.20	-0.00	-3314.04	-0.09	0	-3400.24
Total	372926.93	2.20	127229.22	3.47	0	500156.15

Summary Oil Mill Emissions and Credits

Remarks	tCO ₂ e	tCO ₂ e/t FFB
Emissions sources		
POME	71566.08	0.31
Fuel consumption	476.08	0
Grid electricity	0	0
Credits	0	0
Export of grid electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	72042.16	0.31

Palm Oil Mill Effluent (POME) Treatment

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

POME Divert to Anaerobic Digestion

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

7.10.2

Base on hectare statement year 2022, planting year on the PT JMS 2005 until 2016, no new planting activities above 15 November 2018.

7.10.3

For existing operation, the company has identified pollutions and emissions sources of Bangkirai POM for period 2022, such as CO₂ (boiler, generator, transportation), CH₄ (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 (CO₂, 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 1-year 2022.

Fossil fuel reducing on Bangkirai POM have been implemented by fiber/shell usage for boiler. POME has been monitored every months and monitoring periods January 2021 until October 2022, 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;

The results of interviews with management, representatives of surrounding villages and field observations revealed that there were no new plantings at PT JMS. The last planting was carried out in 2015 (the youngest plant was 7 years old).

The company showed documents supporting the absence of burning activities in the plantation concession area, which was shown in the Land Clearing Work Agreement No. 0151/04/2014/Lokal-JMSGHRE Land Clearing and No. 0155/04/2014/Lokal-JMSGHRE Land Clearing between PT. JMS with CV. Prima Jaya, dated 05 April 2014, regarding the construction of planting paths, roads and ditches in plantation with an area of 18.70 Ha and 18.23 Ha. The agreement also describes attention to environmental aspects (environmental responsibility).

7.11.2

The company shows the SOP for prevention and control of land fires, which among others are listed in the SOP document for Land and Building Fire Control (No. SOP-OTH-F3-029 version 1.0 dated March 3, 2016) which was approved by the CEO of Eagle High Plantation. This procedure aims to establish procedures for determining systems for prevention, handling and control of land and building fires so that handling and control can be carried out correctly and appropriately. This procedure document contains the scope, definitions used, references, policies on monitoring facilities and fire extinguishing equipment, outreach and marking of fire-prone areas, policies on fire emergency response organizations, fire patrols, procedures for preventing and handling fires (prevention, fire-prone maps, tasks each team, warning signs, training and fire simulation), reporting to relevant agencies.

The company shows the socialization record of the SOP for Prevention and Control of Land Fires, for example the Minutes of socialization on 12 March 2021 at GHRE division 3.

The company has fire prevention and control implementation, including:

- Has an emergency response structure for land fires.
- Conduct regular land fire prevention and management training, as demonstrated through training records, such as the fire prevention training on 10 March 2021 attended by 50 participants.
- Monitor fire facilities and infrastructure regularly every month. From the simulation results of land fire facilities and infrastructure, it is known that the facilities and infrastructure are in good functioning condition and are in a ready-to-use condition.
- Report on the implementation of fire prevention and control contained in the land fire control system report every year. For example, the 2021 period report was submitted to the Plantations Service in Kutai Kartanegara Regency on March 30, 2022.

The results of interviews with the surrounding village community and related agencies (Environment and the Plantation Agency) obtained information that there had been no incidents of land fires in the last 1 year. From the results of the interviews, information was also obtained that the company had submitted a report regarding land fires.

7.11.3

The company can show recordings of periodic training, for example the Minutes of Socialization which were carried out on November, 8 2022 which involved local stakeholders such contractors, farmers and villagers.

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 document verification, it was known that all land clearing activities were mechanical. Based on an interview with relevant agencies, it was also stated that the company has shown a commitment not to burn for land clearing.

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

Based on document verification on hectare statement and interview with representative company, it is known that the span of planting year was from 2005-2016. There is no new planting after 15 November 2018. The management unit carried out the clearing after November 2005 without prior HCV assessment. The company has sent a LUCA analysis to the RSPO. There was an email from RSPO Compensation (rspocompensation@rspo.org) on 25 November 2019 related to the LUCA Review Reports of PT JMS which stated that the results of PT JMS review were a total of 14,649.90 Ha of FCL and 101.73 Ha and Remediation area 5,028.76 Ha of environmental remediation 4952.59 Ha (peat) and 76.17 Ha (riparian). The company can show the Land Use Change Analysis (LUCA) Review Report PT JMS with the conclusion "Based on verification and analysis, it is concluded that the report submitted by the company (PT JMS) was accepted (PASS)" dated 12 March 2020. Regarding in this case, the company continues by conducting the RaCP which is discussed in indicator 7.12.8.

7.12.2

The company has carried out HCV identification which was carried out in January 2012 by Aksenta with the team leader having an RSPO Approved HCV Assessor, using the 2008 HCV toolkit. In the HCV document it is stated that the scope of the study is a HGU covering an area of 16.000 Ha hectares but when a map verification is carried out, the scope of the study refers to the Location Permit \pm 21,000 Ha, this was also confirmed by the company's GIS team which showed the scope area used in the HCV assessment was not based on HGU but rather a Location Permit. Based on the results of the HCV study, the potensial HCV area was **626,38** Ha and the peat conservation area was **5650.76** Ha. The following is data on the area of HV based on the results of the study, including:

Location	Area (Ha)	HCV Type
Peat Land Area (Conservation non-riparian)	5650.76	4.1
Keham riparian	11.63	1.1, 1.3, 1.4, 2.3, 4.1, 5
Kedang Renik riparian	138.31	1.1, 1.3, 1.4, 2.3, 4.1, 5
Kanal Utama riparian	50.25	1.1, 4.1
Kanal Blok riparian	209.26	1.1, 4.1
Reservoir POM	3.49	1.1, 1.3, 1.4, 2.3, 4.1
Lake/Swamp Gaharu 1	15.78	1.1, 1.3, 1.4, 2.3, 4.1
Lake/Swamp Gaharu 2	15.01	1.1, 1.3, 1.4, 2.3, 4.1
Lake/Swamp Gaharu	15.13	1.1, 1.3, 1.4, 2.3, 4.1
Watering Reservoir Jatimas Estate 1	12.56	1.1, 1.3, 1.4, 2.3, 4.1, 5
Watering Reservoir Jatimas Estate 2	12.56	1.1, 1.3, 1.4, 2.3, 4.1, 5
Watering Reservoir Jatimas Estate 3	12.56	1.1, 1.3, 1.4, 2.3, 4.1
Watering Reservoir Jatimas Estate 4	12.56	1.1, 1.3, 1.4, 2.3, 4.2
Watering Reservoir Jatimas Estate 5	12.56	1.1, 1.3, 1.4, 2.3, 4.1, 5
Watering Reservoir Jatimas Estate 6	12.56	1.1, 1.3, 1.4, 2.3, 4.1, 5
Watering Reservoir Angsana Estate	12.56	1.1, 1.3, 1.4, 2.3, 4.1, 5
Water source Gaharu Estate	12.56	1.1, 1.3, 1.4, 2.3, 4.1, 5
Forest Area (Animal habitat)	67.04	1.1, 1.3, 1.4, 2.3
Total	6277.14	1.1, 1.3, 1.4, 2.3, 4.1, 5

In HCV identification, measurement of the area of HCV is carried out through map delineation so that it will change during

HCV management and monitoring activities after detailed measurements are carried out in the field. For this justification, the company carried out a redelineation, so the final result was a total HCV area of **625 Ha**.

The HCV assessment has also involved local communities through group discussion forums (FGD), namely 5 villages, namely Muara Leka village, Lebak Cilong village, Lebak Former village, Kayu Batu village, Perian village and government representatives.

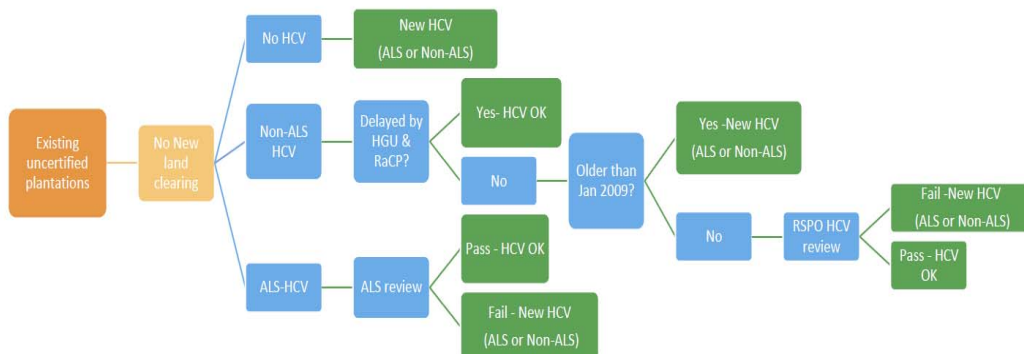
Based on the results of field observations, there are several HCV areas (Forest Area Block T51 Bangkirai estate and riparian Kendang Renik block H8 Gaharu estate) that have changed from the initial conditions that were designated as HCV areas, for example, forested areas bordering springs that have now become food bank, river borders that have changed contours due to ditch-making activities, and forested areas bordering eyes. Water that has become a planted area for oil palm.

Based on this, the company explains its commitment to maintain the HCV area which has described on indicator 7.12.4.

Based on the results of the Document Review it is known that:

- The management unit has carried out an HCV assessment carried out by an RSPO approved assessor in 2012.
- In accordance with the explanation in the Interpretation of Indicator 7.12.2 and Annex 5 for the RSPO Principles and Criteria, the old HCV for existing plantations can be used with the following conditions:

4.2 Existing Uncertified Plantations (No New Land Clearing)



The company has communicated with the RSPO regarding the approval of the HCV documents namely:

- Submission of HCV documents for review by RSPO on 31 May 2022.
- From 30 August 2022 to 15 November 2022 the company has asked the RSPO regarding the results of the HCV document review, but there has been no response from the RSPO.

The management unit has not been able to show evidence, the HCV documents in their possession have received RSPO approval in accordance with the Interpretation of Indicator 7.12.2 and Annex 5 for the RSPO Principles and Criteria. **Based on that's explanations it became non conformity No 2022.21 with Major category**

7.12.3

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

7.12.4

The company already has an HCV management plan that is listed in the Management and Monitoring Plan of HCV for the period 2022 – 2027. The management plan was prepared based on the results of a participatory manner involving the surrounding community through group discussion forums (FGD), namely 5 villages, namely Muara Leka village, Lebak Cilong village, Lebak Former village, Kayu Batu village, Perian village and government representatives dated 13 December 2021 (and employees and reported to BKSDA Kalimantan Timur Province dated 3 March 2022. 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.

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 22 October 2022 for staff and employees.
- HCV sign board maintenance carried out on January until October 2022.
- Minutes of Enrichment of the Keham riparian, Kedang Renik and Main Drain TRBE, on March 3 2020, in the form of planting: 15 Pulai trees (*Alstonia scholaris*), 9 Terap trees (*Artocarpus elasticus*), 1 Banyan tree (*Ficus benyamina*), 17 Mahang trees (*Macaranga sp*) and 10 Medang trees (*Actinodaphne borneensis*).
- Minutes of Planting Green Plants on the Perian/Leka riparian at Angsana Estate, on March 4 2020, in the form of planting: 20 stems of Mahogany (*Swietenia sp.*).
- Minutes of Planting Green on the Angsana Estate office and housing, on March 23 2020, in the form of planting: 30 cashew trees.
- Documents for monitoring and caring for enrichment plants for the 2021 and 2022 periods. From the monitoring results for 2022, it was found that the success of the enrichment plants was above 50%.
- Surface water quality testing in semester 2 of 2021 and semester 1 of 2022.
- Testing of clean water (reservoir) semester 2 of 2021 and semester 1 of 2022.
- Animal conflict mitigation training on 29 March 2022 for all staff and employees all estate.
- Animal monitoring was carried out on January until October 2022 on all estate. The results of animal monitoring revealed that there are protected animals in accordance with LHK Ministerial Regulation NO 106 of 2018, namely *the 65enst emas (gracula religiosa)*, *macan akar (felix bengalensis)* dan *trenggiling peusing (manis javanica)*.
- Identification of threats and sources of threats to the presence of HCVs carried out in January until October 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 stated in several documents, namely PT JMS's 2012 HCV assessment recommendation explaining the HCV management plan, namely the establishment of a protected area area for a 50-meter-wide reservoir and the installation of HCV signboards such as prohibiting activities such as hunting, burning, cutting trees and use chemicals especially in those areas. As explained in PT JMS' 2012 HCV assessment, the PKS reservoir is an HCV area of 3.49 Ha.

However, based on the results of field visits in the POM reservoir riparian conservation area, information was obtained that there were no HCV area boundaries on the reservoir's riparian, that the application of chemical pesticides was also found in that area.

The company has shown an HCV management and monitoring plan for the 2022-2027 period, but the company has not been able to show proof of the implementation of HCV management and monitoring documents for the 2022 period.

The company has not been able to show evidence of the implementation of the HCV management and monitoring plan in accordance with the HCV Management plan it has. **Based on that's explanations it became non conformity No 2022.22 with Major category**

7.12.5

Based on a review of the documents in the January 2012 identification report, field observations and the results of

consultations with relevant agencies and interviews with local communities, it is known that there is no community arable land that is used as a conservation area so there is no need for an agreement that has been negotiated to protect the HCV area and rights local community.

7.12.6

The company already has a policy set out in procedures related to the protection of endangered species, namely Procedure Number OP-OTH-F3-12 regarding Management and Monitoring of Conservation Areas dated January 10, 2019 as well as the Sustainability Policy document owned by PT EHP Group. The document contains procedures consisting of preventive and repressive measures in an effort to protect protected wildlife and plants such as sustainability principles, all employees are advised not to hunt, capture, kill and sell protected animals and plants that are endangered and report any such activities. Maintain and not disturb the area designated as HCV area and report any illegal acts. Employees who do not comply will be subject to sanctions in accordance with the applicable laws and regulations. The company also put up no hunting boards with photos of the species and sanctions for violating government regulations in all HCV areas.

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. 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 conducted socialization about the existence of endangered plants and animals to employees and the surrounding community as indicated in the official report of the socialization as evidenced by the official report, accompanied by a photo and attendance list as described in indicator 7.12.4. 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. The results of field observations in several conservation areas indicate that the company has managed protected areas such as replanting local plant species, not logging, using no chemicals, and installing HCV signboards as well as prohibiting hunting and burning to avoid and prevent poaching and/or encroachment. HCV area. Routine monitoring of HCV areas is carried out by several personnel appointed by the company.

Based on interviews with management units and company employees regarding animal protection, the company has committed to protecting animals that are within the scope of corporate governance, such as implementing a ban on hunting, killing and keeping wild animals within the company's environment. Base on observations in employee housing areas also show that no one keeps protected animals, the common pets owned by employees are chickens, cats and dogs that have been domesticated.

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 several river border locations and 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 year by showing the results of HCV monitoring carried out in 2022. The results of observations of fauna in the plantation area still found several types of protected animals that are included in the protection status according to the IUCN, CITES and PermenLHK Number 106 of 2018 includes the *béenst emas* (*gracula religiosa*), *macan akar* (*felix bengalensis*) and *trenggiling peusing* (*manis javanica*).

The company also conducts annual 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. The company also follows up on the improvement of the HCV area management plan which is made annually by involving all relevant stakeholders in the company's operational areas such as the surrounding community, especially the surrounding community and law enforcement. The company also conducts a review related to management and monitoring activities in 2021 as evidenced

in the 2021 HCV Management Plan Review Report which contains evaluation and management and monitoring recommendations as an effort to improve HCV management activities in 2022. Based on the results of the review, several management recommendations were obtained, including:

- Increase socialization activities to staff, plantation employees and the community around the plantation to increase the level of understanding of HCVs, especially for employees and staff in the factory environment.
- Carry out various action plans for corrective actions based on management and monitoring recommendations that have been carried out.
- Improved the writing on HCV signboard and put-up signboards for animal monitoring paths in areas that have been designated as monitoring paths in each Estate.
- Improve the Management Plan document form in accordance with the SOP for Management and Monitoring of HCVs.

All evaluation results will be reviewed and will be adjusted to the HCV management program in 2022. The evaluation results also indicate an increase in species encounters. In addition, 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 to jointly protect the HCV area namely 5 villages, namely Muara Leka village, Lebak Cilong village, Lebak Former village, Kayu Batu village, Perian village and government representatives dated 13 December 2021.

7.12.8

The management unit has completed a LUCA review for PT JMS which was approved with the Pass results on March 12, 2020. From the results of the LUCA review it is known that there is an FCL of 101.73 Ha (Compensation) and 5,028.76 Ha (Remediation). The Email from RSPO (Joani) on 27 May 2022 stating that Concept Note Annex 7 for PT BHL, JMS and PT STP has been received/re-endorsed. The company has been 67enstru of the Annex 8 "Remediation & Compensation Plan" PT Eagle High Plantation has received a **Satisfactory** result dated 11 October 2022 and this 67enstru is completed and will be proceed with certification.

7.12.2	Status: NC No. 2022.21 with Major Category	
7.12.4	Status: NC No. 2022.22 with Major Category	

3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or √
IC	This matter will be verified further at annual surveillance audit	NA
	Status: Not Applicable	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or √
IC	This matter will be verified further at annual surveillance audit	NA
	Status: Not Applicable	
3.	Implementation of Certificate and Trademark is not used on product	X or √
IC	This matter will be verified further at annual surveillance audit	NA
	Status: Not Applicable	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or √
IC	This matter will be verified further at annual surveillance audit	NA
	Status: Not Applicable	

3.3 Summary of RSPO Partial Certification.

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

PT Eagle High Plantation Tbk Time Bound Plan (TBP) is explained in table 1.5. PT Eagle High Plantation Tbk run nine (9) mills and seventy two (72) estates in Indonesia. PT Eagle High Plantation Tbk has informed the TBP, MUTU has considered that PT Eagle High Plantation Tbk is comply with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by PT Eagle High Plantation Tbk on November 2022 by the sustainability departement..

MUTU has verified partial certification for un-certified unit's subsidiary of PT Eagle High Plantation Tbk based on their Time Bound Plan. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There is no significant land conflicts which have not been declared below.
- The company has follow RSPO requirement related to Remediation and Compensation Procedure, but not for New Planting Procedure. The company will follow the sanction from RSPO for area that has open after 1 January 2010 without NPP.
- There is no labour disputes that are not being resolved through an agreed process.
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company Group/Holding Statement: PT Eagle High Plantations, Tbk. Had conducting internal audit towards partial certification for its subsidiary companies on 31 October 2022.</p> <p>Auditor Verification: The has shown Internal Audit report for all uncertified management unit as follows:</p> <ol style="list-style-type: none"> 1. PT Bumilanggeng Perdanatrada (PT BLP) 2. PT Eagle High Plantation (PT EHP) 3. PT Bumi Hutani Lestari (PT BHL) 4. PT Adiyaksa Dharmasatya (PT ADS) 5. PT Jaya Mandiri Sukses (PT JMS – East Kalimantan) 6. PT Manunggal Adi Jaya (PT MAJ – East Kalimantan) 7. PT Suryabumi Tunggal Perkasa (PT STP – East Kalimantan) 8. PT Sawit Sukses Sejahtera (PT SSS) 9. PT Prima Cipta Selaras (PT PCS) 10. PT Arrtu Plantation (PT APN) 11. PT Arrtu Energie Resources (PT AER) 12. PT Arrtu Borneo Perkebunan (PT ABP) 13. PT Arrtu Agro Nusantara (PT AAN) 14. PT Mandiri Kapital Jaya (PT MKJ) 15. PT Multikarya Sawit Prima (PT MSP) 16. PT Seguri Serasau Sejahtera (PT SGSS) 17. PT Satria Manunggal Sejahtera (PT SMS)

		18. PT Bumi Sawit Utama (PT BSU) 19. PT Agrolestari Kencana Makmur (PT AKM) 20. PT Varia Mitra Andalan (PT VMA) 21. PT Wanacatur Jaya Utama (PT WCJU) 22. PT Tandan Sawita Papua (PT TSP) 23. PT Manunggal Adi Jaya (PT MAJ – South Kalimantan) 24. PT Karyapada Agrisejahtera (PT KAPAG) 25. PT Saka Kencana Sejahtera (PT SKS) 26. PT Pesonalintas Surasejati 27. PT Singalan Asetama (PT SGA) 28. PT Suryabumi Tunggal Perkasa (PT STP – South Kalimantan) 29. PT Jaya Mandiri Sukses (PT JMS – South Kalimantan) The audit conducted on 31 October 2022
2.1.2	No replacement after dates defined in Nis Criterion 7.3 of: <ul style="list-style-type: none"> Primary forest. Any area identified as containing High Conservation Values (HCVs). Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>Company Group/Holding Statement: PT Eagle High Plantations, Tbk is not reporting disclosure of liability but has already deliver LUCA to RSPO through email.</p> <p>Auditor Verification:</p> <ul style="list-style-type: none"> - PT BLP – EHP Mill <ul style="list-style-type: none"> HCV assessment has conducted by Tropenbos International Indonesia on September 2012. LUCA has conducted by Aksenta on February 2015. The LUCA had been reviewed by RSPO on 25 July 2016 and passed the review, as informed through an email dated 9 September 2016. The RaCP Concept Note analysis has stated passed by RSPO Compensation, informed through email dated 09 September 2016. 31 Oct 2018: Submission of the LUCA for PT BLP 562 ha and updated LUCA for PT AAN 7 Oct 2019: 1st Review (sent to Aksenta for response on 8 Oct 2019) 20 Nov 2019: clarification submitted - PT EHP – EHP Mill. <ul style="list-style-type: none"> 23 Nov 2018: Concept Note was submitted to RSPO 7 Jan 2019: disclosure of liability 7 Feb 2019: Preliminary feedback was received from the RSPO 13 Feb 2019: Updated concept note was submitted to RSPO 19 Feb 2019: More information was being asked by RSPO 20 Feb 2019: More information was supplied to RSPO 18 Mar 2019: more clarification was being asked 18 Mar 2019: clarifications responded 25 Mar 2019: environmental remediation issue resolved, the concept note is now forwarded to the Compensation Panel to finalize the review and approval of the concept note 9 Apr 2019: more information required 10 Apr 2019: information supplied 25 Apr 2019: Concept Note approved, Compensation Plan submitted to RSPO. - PT BHL – BHL Mill.

		<ul style="list-style-type: none"> • HCV assessment has conducted by Tropenbos International Indonesia on July 12th 2012. • LUCA has conducted by Aksenta on July 2017. The LUCA had delivered to RSPO Compensation through email on Oct. 15th 2018 and has been reviewed from RSPO Reviewer on March 24th 2018 but still need clarification. • LUCA for location permit of PT BLP was completed in May 2016 by Aksenta. Submitted to RSPO on 31 Oct 2018 <p>- PT ADS – ADS Mill.</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Tropenbos International Indonesia on July 12th 2012. • LUCA has conducted by Aksenta on July 2017. The LUCA has been submitted to RSPO Compensation through email on 29 Sep 2017 and has been reviewed by RSPO Reviewer on 20 Mar 2018. On 26 Sep 2018, further clarifications were required and on 15 Oct 2018, an update of the LUCA was submitted in response to the clarifications <p>- PT JMS – Bangkirai Mill.</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Sonokeling Akreditasi Nusantara on November 2011. • LUCA had conducted by Aksenta on December 2016. The LUCA had been reviewed by RSPO on April 6th 2018 and on March 14th 2018. The RaCP analysis has stated passed for 27.10 ha by RSPO Compensation, informed through email dated September 18th 2018. However, for 113.35 ha was still on going process by RSPO. <p>- PT MAJ – Bangkirai Mill.</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Sonokeling Akreditasi Nusantara on December 2011. • 7 Jan 2019: disclosure of liability • 30 Apr 2019: LUCA submitted • 12 Nov 2019: Clarification required (sent to Daemeter on 13 Nov 2019) – RSPO sent the MAJ Kalsel file • 29 Jan 2020: Clarification required (sent to Daemeter on 29 Jan 2020) <p>- PT STP – Bangkirai Mill.</p> <ul style="list-style-type: none"> • HCV assessment has conducted by Sonokeling on December 2011. • LUCA has conducted by Aksenta on July 2017. The LUCA has been submitted to RSPO Compensation through email on 29 Sep 2017 and has been reviewed by RSPO Reviewer on 11 Mar 2018. On 26 Sep 2018, further clarifications were required and on 19 Oct 2018, an update of the LUCA was submitted in response to the clarifications. • 15 Oct 2019: 2nd clarification required (sent to Aksenta for response on 16 Oct 2019) • 9 Dec 2019: clarification submitted • 29 Jan 2020: Pass
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2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement: All subsidiaries of EHP not conduct NPP for new planting since 1 January 2010, detail information consist of:</p> <ol style="list-style-type: none"> 1. PT MSP: planting year consist of 2009 – 2016 and not conduct NPP. 2. PT SGSS: planting year consist of 2008 – 2014 and not conduct NPP. 3. PT SMS: planting year consist of 2011 – 2014 and not conduct NPP. 4. PT SMS: planting year consist of 2013 – 2015 and not conduct NPP. 5. PT AKM: planting year consist of 2011 – 2015 and not conduct NPP. 6. PT VMA: planting year consist of 2015 and not conduct NPP. 7. PT WCJU: planting year consist of 2007 – 2014 and not conduct NPP.

		<p>Auditor Verification: Based on auditor verification 24 subsidiaries of EHP not conduct NPP and will be object as sanction, those unit consist of:</p> <ol style="list-style-type: none"> 1. Palms in PT BLP were planted in 1997 to 2014. 2. Palms in PT BHL were planted in 1998 to 2014. 3. Palms in PT ADS were planted in 2006 to 2014. 4. Palms in PT JMS (Bangkirai Mill) were planted in 2005 to 2015. 5. Palms in PT MAJ (Bangkirai Mill) were planted in 2006 to 2015. 6. Palms in PT STP (Bangkirai Mill) were planted in 2007 to 2014. 7. Palms in PT SSS (Bangkirai Mill) were planted in 2008 to 2014. 8. Palms in PT PCS (Bangkirai Mill) were planted in 2011 to 2014. 9. Palms in PT APN (Kelampai Mill) were planted in 2009 to 2017. 10. Palms in PT AER (Kelampai Mill) were planted in 2013 to 2016. 11. Palms in PT ABP (Kelampai Mill) were planted in 2011 to 2016. 12. Palms in PT AAN (Kelampai Mill) were planted in 2011 to 2017. 13. Palms in PT MKJ (Kelampai Mill) were planted in 2008 to 2015. 14. Palms in PT MSP were planted in 2009 to 2016. 15. Palms in PT SGSS were planted in 2015 to 2016. 16. Palms in PT SMS were planted in 2011 to 2014. 17. Palms in PT BSU were planted in 2013 to 2015. 18. Palms in PT AKM were planted in 2011 to 2015. 19. Palms in PT VMA were planted in 2015. 20. Palms in PT WCJU were planted in 2007 to 2014. 21. Palms in PT TSP were planted in 2011 to 2014. 22. Palms in PT PLS were planted in 2005 to 2014. 23. Palms in PT SGA were planted in 1997 to 2013. 24. Palms in PT JMS (South Kalimantan) were planted in 2005 to 2016. <p>There are 5 subsidiaries of EHP that not conduct land clearing after 1 January 2010, i.e.:</p> <ol style="list-style-type: none"> 1. PT EHP is a palm oil processing mill without estates → not applicable. 2. Palms in PT MAJ (South Kalimantan) were planted in 2006 to 2008 3. Palms in PT KAPAG were planted in 1997 to 2007 4. Palms in PT SKS were planted in 2006 to 2008 5. Palms in PT STP (South Kalimantan) were planted in 2005 to 2008
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>Company Group/Holding Statement:</p> <ol style="list-style-type: none"> 1. PT MSP: There are no land conflicts 2. PT SGSS: There are no land conflicts 3. PT SMS: There are no land conflicts 4. PT BSU: There are no land conflicts 5. PT AKM: There are no land conflicts 6. PT VMA: There are no land conflicts 7. PT WCJU: There are no land conflicts <p>Auditor Verification:</p> <ol style="list-style-type: none"> 1. SIA for PT BLP has conducted by Sonokeling on 2013 and has also included on AMDAL report dated July 22nd 1998. Both report informed that there were no land conflict which negatively disturbed company operational activities. <p>However, http://tanahkita.id/v2/data/konflik/detil/Wldkbw/ informed that there was land dispute with Kumai Hulu Village for</p>

		<p>about 337.00 ha. Regarding this matter, the company shows documents related to process of negotiation and mediation with BPN dated November 19th 2013. Last update was Letter from company dated October 17th 2018 as response towards claimnant letter dated March 11th 2018, which mentioned that it was clear that those dispute area legally owned by PT BLP as stated on BPN Letter dated November 19th 2013. However, it was recommended to claimnant to continue the process into Court. Company letter was also attached to Bupati Kotawaringin Barat, kapolres Kotawaringin Barat, Camat Kumai dan Kepala Desa Bedaun. There is no current respon from claimnant.</p> <p>2. Land conflict in PT EHP has no exist.</p> <p>3. SIA for PT BHL Mill has conducted by Sonokeling on September 2013 and also included on AMDAL report dated August 26th 2009. Both report informed that there were no land conflict which negatively disturbed company operational activities. However, it was informed on internal audit that there was land dispute for about ± 60 ha in Kerinci Estate. Unit management shows several related documents, such as Official Letter or dispute mapping field measurement which involving affected parties including Kepala Desa Mirah Kalanaman and Kepala Urusan Pemerintah Desa Mirah Kalanaman on November 20th 2008; as well as results of Pengadilan Negeri Kasongan in Katingan and Pengadilan Tinggi Palangkaraya. Todate, update on this matter was ongoing process of checking in Mahkamah Agung with case register No. 1634K/Pdt/2017.</p> <p>4. SIA in PT ADS has conducted by Sonokeling on September 2013 and also included on AMDAL report dated August 26th 2009. Both report informed that there were no land conflict which negatively disturbed company operational activities.</p> <p>However, https://kalteng.antaranews.com/berita/242411/perusahaan-sawit-ads-garap-lahan-pertanian-warga informed that there was land dispute 116 ha with Village of Tanjung Jorong (15 person). Regarding this matter, the company shows minutes of mediation with affected parties in Police Resort of Kotim on December 22nd 2015 for dispute area about 600.00 ha, resulting the claimnant to continue the process into Court. However, there is no progress from claimnant since December 25th 2015.</p> <p>5. SIA in PT JMS (Bangkirai Mill) has conducted by Sonokeling on October 2011 and also included on AMDAL dated June 18th 2007. Both report informed that there were no land conflict which negatively disturbed company operational activities. However, there were about 4,033.20 ha situated within HGU were still occupied by local people. Regarding this matter, unit management shows 76enstrual76ies76 process among two parties which informed that the locals has not willing for any compensation. These 76enstrual76ies76 has lastly conducted on 2015 and no positive progress after that.</p> <p>6. SIA in PT MAJ (Bangkirai Mill) has conducted by Sonokeling on December 2011 and also included on AMDAL report dated June 18th 2007. Both report informed that there were no land conflict which negatively disturbed company operational activities.</p>
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2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Company Group/Holding Statement:</p> <p>There is no issue of labour disputes in uncertified unit. The company also has procedures to deal with complaints workers before they become conflicts. The procedure is stated in Company Regulation article 36.</p> <p>Auditor Verification:</p> <p>Based in information from public source and RSPO website informed:</p> <ul style="list-style-type: none"> • Labour dispute in PT BLP has no exist. • Labour dispute in PT EHP has no exist. • Labour dispute in PT BHL has no exist. • Labour dispute in PT ADS has no exist.

		<ul style="list-style-type: none"> • https://www.korankaltim.com/kutai-kartanegara/read/1972/miris-buruh-sawit-hanya-digaji-rp100-ribu-per-bulan informed that there was labour dispute towards minimum wage in PT JMS. However, as informed on ISPO verification in December 2018, it was known that the company has paid wages in accordance with regulation. • Labour dispute in PT MAJ has no exist. • Labour dispute in PT STP has no exist. • Labour dispute in PT SSS has no exist. • Labour dispute in PT PCS has no exist. • Labour dispute in PT APN has no exist. • Labour dispute in PT AER has no exist. • Labour dispute in PT ABP has no exist. • Labour dispute in PT AAN has no exist. • Labour dispute in PT MKJ has no exist. • Labour dispute in PT MSP has no exist. • Labour dispute in PT SGSS has no exist. • Labour dispute in PT SMS has no exist. • Labour dispute in PT BSU has no exist. • Labour dispute in PT AKM has no exist. • Labour dispute in PT VMA has no exist. • Labour dispute in PT WCJU has no exist. • PT TSP: there are dispute related to workers in website (http://ipom.global/2017/08/29/eagle-high-dan-rajawali-terkena-pelanggaran-hak-asasi-manusia-di-perkebunan/) related to workers right and in website (https://pusaka.or.id/2016/01/karyawan-sawit-ditembak-perusahaan-harus-bertanggungjawab/) related to Christmas allowance/ THR. Based on document verification known that there is worker who was shot because he attack the office by flush the gasoline. The actions of these workers are due to not being paid for Christmas allowance / THR. But based on company clarification, the Christmas allowance / THR will be give based on procedure and this worker not comply with the procedure. Company has involving related stakeholder such as Labour Union, Manpower Agency of Papua and Keerom Regency, employees and Police Officials in solving to case. Furthermore, compensation has been given by the company as agreed by the involved workers. • Labour dispute in PT MAJ (South Kalimantan) has no exist. • Labour dispute in PT KAPAG has no exist. • Labour dispute in PT SKS has no exist. • Labour dispute in PT PLS has no exist. • Labour dispute in PT SGA has no exist. • Labour dispute in PT STP (South Kalimantan) has no exist. • Labour dispute in PT JMS (South Kalimantan) has no exist.
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Company Group/Holding Statement:</p> <p>The company has a mechanism to evaluate compliance with regulations. In SOP describes procedures for compliance, completeness and groove sections which explain in detail to evaluate compliance with the legislation.</p>

	<p>Auditor Verification:</p> <ol style="list-style-type: none"> Legal requirement in PT BLP – EHP Mill <ul style="list-style-type: none"> According to Decree of Land Title (SK HGU), PT BLP has total area for about 8,941.12 ha. Business Permit which covers about $\pm 7,500$ ha; $\pm 1,400$ ha and 479.20 ha. However, there was additional ongoing process to obtain land title (HGU) from Location Permit which covers about 560.00 ha. The most updated on this matter is there was field Cadasteral mapping resulting Kadasteral Map dated September 4th 2017 for area covers 601.39 ha with scale 1:20,000. PT EHP has Location Permit, Business Permit for oil palm processing with capacity about 60 ton FFB/hour and land title (HGB) for area covers 64.52 ha. Those legal documents were in accordance with actual company operations. PT BHL has a match IUP and HGU, which totaling for about 12,846.00 ha. PT ADS has location permit $\pm 11,500.00$ ha (2000) and $\pm 7,000.00$ ha (2004); IUP-2003 for about $\pm 11,500.00$ ha and HGU for about 5,465.80 ha. PT JMS has IUP for about 21,000.00 ha and HGU for about 14,665.75 ha. However, there were totaling about 1,629.75 ha of PT JMS managed area without HGU, describes on the following Table <table border="1"> <thead> <tr> <th>Estate</th><th>Area (ha)</th></tr> </thead> <tbody> <tr> <td>Jatimas</td><td>456.29</td></tr> <tr> <td>Gaharu</td><td>230.59</td></tr> <tr> <td>Trembesi</td><td>104.31</td></tr> <tr> <td>Angsana</td><td>259.45</td></tr> <tr> <td>Bangkirai</td><td>27.09</td></tr> <tr> <td>Kulim</td><td>552.02</td></tr> <tr> <td>Total</td><td>1,629.75</td></tr> </tbody> </table> <p>On the non-HGU area, the company has obtain Location Permit (2014, expired in July 2018) and IUP-2017 for area covers 2,296.17 ha. The most updated on this matter is the company was in process on extending Location Permit.</p> <p>PT JMS has smallholders with total area about 2,847 ha, which associated in three Cooperatives, namely Leka Mandiri, Keham Lestari and Agung Baya. As per July 2018, the cooperatives has area about 773 ha, 791 ha and 1,283 ha, respectively.</p> PT MAJ has IUP-2006 for about 21,000 ha (Last Location Permit in 2014 was about 7,242.00 ha) and HGU for about 5,027.90 ha. However, there was additional ongoing process to obtain land title (HGU) from Location Permit (2014) which covers about 1,400.00 ha; and IUP (2013) for area covers 1,341.00 ha. Update on this matter are: <ul style="list-style-type: none"> The company has sent request Letter for Kadasteral measurement mapping on July 10th 2014. Extension on location permit. Inventarisatation on land compensation. PT STP has Location permit (2006) and IUP (2007) for 17,500 ha; but only has HGU for about 5,005 ha. 	Estate	Area (ha)	Jatimas	456.29	Gaharu	230.59	Trembesi	104.31	Angsana	259.45	Bangkirai	27.09	Kulim	552.02	Total	1,629.75
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Kulim	552.02																
Total	1,629.75																

		<p>8. PT SSS has a match IUP and HGU, which totaling about 20,220.92 ha.</p> <p>9. PT PCS has IUP totaling for about ± 11,203 ha. However, the company was still ongoing to obtain land title (HGU). As per update during partial assessment, it was informed that the progress is already on "Risalah Panitia B" or Kadasteral mapping.</p> <p>10. PT APN has IUP 17,300 ha. There was 82enstrual82ies about 44.57 ha between HGU Decree (11,924.48 ha) and Certificate (11,879.91 ha) (Decree>Cert.). This is due differencies between "Peta Bidang" as mentioned in HGU Decree and "Surat Ukur" as mentioned in Certificate. Detail on hectare statement is presented in the following Table:</p> <table border="1"> <thead> <tr> <th>No. NIB</th><th>Peta Bidang (SK HGU – 2013)</th><th>Surat Ukur (Cert. HGU – 2013)</th></tr> </thead> <tbody> <tr><td>098</td><td>271.04</td><td>190.40</td></tr> <tr><td>099</td><td>5.28</td><td>5.17</td></tr> <tr><td>100</td><td>4.12</td><td>3.95</td></tr> <tr><td>101</td><td>33.07</td><td>32.57</td></tr> <tr><td>102</td><td>110.44</td><td>109.88</td></tr> <tr><td>103</td><td>4,243.09</td><td>4,239.19</td></tr> <tr><td>104</td><td>1,235.90</td><td>1,235.91</td></tr> <tr><td>105</td><td>2,426.30</td><td>2,570.09</td></tr> <tr><td>106</td><td>3,075.43</td><td>3,077.25</td></tr> <tr><td>107</td><td>519.92</td><td>415.50</td></tr> <tr><td>Total</td><td>11.924.48</td><td>11,879.91</td></tr> </tbody> </table> <p>11. PT AER has Location permit for about 16,000 ha and IUP-2011 for about 15,690 ha. However, there is no land title (HGU). The most updated on this matter is there was field kadasteral mapping resulting Kadasteral Map dated December 16th 2011 for area covers 11,650.09 ha with scale 1:40,000.</p> <p>12. PT ABP has Location permit for about 13,870 ha and IUP-2011 for about 6,947 ha. However, there is no land title (HGU). The most updated on this matter is there was field mapping resulting Kadasteral Map dated November 29th 2017 for area covers 4,295.47649 ha with scale 1:30,000.</p> <p>13. PT AAN has Location permit for about 13,250 ha and IUP-2011 for about 11,950 ha. However, there is no land title (HGU). The most updated on this matter is there was field mapping resulting Kadasteral Map dated December 30th 2011 for area covers 11,944.61 ha with scale 1:30,000.</p> <p>14. PT MKJ has Location Permit-2014 for about 7,300.00 ha; IUP-2012 for about 4,372.00 ha. However, there is no land title (HGU). The company shows request letter of Kadasteral measurement to BPN dated September 7th 2016.</p> <p>15. PT MSP: has obtain HGU for 6,527 Ha and IUP for 13,950 Ha.</p> <p>16. PT SGSS: has obtain IUP for 7,000 Ha. HGU not yet process because the company on going for land compensation, until 2015 has compensated for area 960 Ha.</p> <p>17. PT SMS: has obtain HGU decree for an area of 4918.5508 Ha, but HGU certificate not yet issued.</p>	No. NIB	Peta Bidang (SK HGU – 2013)	Surat Ukur (Cert. HGU – 2013)	098	271.04	190.40	099	5.28	5.17	100	4.12	3.95	101	33.07	32.57	102	110.44	109.88	103	4,243.09	4,239.19	104	1,235.90	1,235.91	105	2,426.30	2,570.09	106	3,075.43	3,077.25	107	519.92	415.50	Total	11.924.48	11,879.91
No. NIB	Peta Bidang (SK HGU – 2013)	Surat Ukur (Cert. HGU – 2013)																																				
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Total	11.924.48	11,879.91																																				

		<p>18. PT BSU: has obtain IUP for 6,000 Ha. HGU not yet process, because the company on going for land compensation, until 2013 has compensated for area 1,380.58 Ha.</p> <p>19. PT AKM: has obtain approval for cadastral but not yet conduct measurement. The company will consultation with BPN related to this case.</p> <p>20. PT VMA: has obtain decree to release forest area in 27 June 2013 for area 20,325.20 Ha. HGU not yet process because there is complaint from NGO (green peace). After that company conduct HCS and the result is only 3000 Ha with no HCS in separate area. Now the company is stop to develop in this area.</p> <p>21. PT WCJU: has obtain decree to release forest area in 29 August 2014 for area 3,803.79 Ha. The Company already submit for cadastral on 31 August 2018 for an area 3,760 Ha (3000 Ha own estate and 760 Ha plasma).</p> <p>22. PT TSP: has obtain HGU (13,143 Ha) and HGB (32.87 Ha).</p> <p>23. PT MAJ (South Kalimantan): cadastral on July 2007 (scale 1:27000) with total area 4,995.237 Ha (2,708.012 Ha available and the rest in not available). On 2009, there was spatial change and some area of company permit located in wildlife reserve.</p> <p>24. PT KAPAG: has obtain HGU (1806 Ha) with IUP 1806 Ha.</p> <p>25. PT SKS: Has obtain IUP (8,050 Ha), cadastral on 29 November 2007 with total area 5002 Ha (146 Ha available and the rest in forest production area). The company is process to release the forest production area but until now not yet finish.</p> <p>26. PT PLS: Has obtain HGU (1,752 Ha) and HGB (41.66 Ha) with IUP 4,407.62 Ha.</p> <p>27. PT SGA: has obtain HGU (6,788 Ha) on 1999 and IUP on 2000. On 2009, there was spatial change and indicate that 1,413 Ha located in forest production area. The company is process to release the forest production area but until now not yet finish.</p> <p>28. PT STP: has obtain HGB (14.56 Ha) on 2008 with IUP 7614.56 Ha on 2006. The company has process the HGU but not yet finish, because there is indication that company area located in forest production area. The company is process to release the forest production area but until now not yet finish.</p> <p>29. PT JMS: has obtain HGU (1614.39 Ha) and IUP 22,678 Ha. On 2009, there was spatial change and indicate that 1,152 Ha located in forest production area. The company is process to release the forest production area but until now not yet finish.</p>
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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 IC Assessment

NCR No.	: 2022.1	Issued by	: Rizliani Aprianita Hsb
Date Issued	: 18 November 2022	Time Limit	: 12 Month (Recommendation 9 Month)
NC Grade	: Major	Date of Closing	: 08 September 2023
Standard Ref. & Requirement	2.1.1 The unit of certification complies with all relevant laws and regulations.		
Evidence observed (filled by auditor):			
1. Wage Scale			
<ul style="list-style-type: none">PT JMS 2022 Wage Scale which is set for January 3, 2022. In this wage scale it is known that the lowest wage is in grade G with a wage of Rp. 3,199,654 and the highest grade is grade A with a salary of Rp. 4,979,654.The results of interviews with the PIC obtained information that for SKU employees (permanent employees), the criteria for grades are based on years of work.The results of verification of the September 2022 payroll document obtained information that the employee's working period is 11 years and 4 months. The wages earned in October 2022 are Rp. 3,199,654.80 (minimum wage)			
2. Absence of BHL (daily worker)			
<ul style="list-style-type: none">The results of interviews with BHL workers in workshops, harvesting activities, spraying, fertilizers at JMSE, GHRE, BKRE, ASNE show that there are BHL workers with a working period of over 1 year to 7 years. In addition, the results of interviews obtained information that workers work every Monday-Saturday.The results of verification of attendance documents for BHL workers for example at the Day Care at BKRE in August – October 2022, it was found that the worker had worked more than 21 working days for 3 consecutive months.			
3. compliance with regulations related to operator licenses			
<ul style="list-style-type: none">Boiler operator<ul style="list-style-type: none">Based on site visits and interviews with workers in sterilizer station, It is known that there are 6 sterilizer units with a capacity of 30 tons/hour.Based on site visits and interviews with workers in Boilers station, it is known that Mill has boilers (steamers) with a capacity of 40 tons/hour in the amount of 2 units.From the list of operators license, it is known that there are 2 employees who have attended class I steam aircraft training for boiler stations and there are no sterilizer operators who have operators license.Permenaker No. 01 of 1988, in Appendix 1 it is explained that for a steam boiler capacity >40 T/h - <60 T/h requires 1 class I operator and 1 class II operator for each shift.Based on the Mill employee list, it is known that there are a total of 6 employees in charge of operating boiler machines which are divided into 2 work shifts (3 people/shift), so there should be 2 class I steam aircraft operators and 2 class II aircraft operators.Power and Production Aircraft Operators<ul style="list-style-type: none">Permenaker No. 38 of 2016 in Articles 110, 111 and Table E it is explained that for prime movers with power > 214.47 HP or 200 kVa must have power and production aircraft operators on each shift.Based on field visits and interviews with mill workers, it is known that mill has 3 generators with a capacity of 320kVa, a total of 2 units with operating status and 240 kVa with operating status which are operated by the operator with a change of 3 shifts.Based on the results of the review of the list of operators license documents, it is known that there are no operators who have an operators license,for power and production aircraft.Welder Operator			

- *Permenaker* No. 2 of 1982 in article 32 states "Management is obliged to carry out and be responsible for the compliance with this Ministerial Regulation".
- Based on field visits and interviews at the Bangkirai Estate workshop, it is known that currently the welding work at the workshop is carried out by a worker with the initials IWN.
- The company shows a list of employees who have received an operator license for a welder, but cannot show an operator license for a welder operator with the initials IWN.

Non-Conformance Description (filled by auditor):

There is not enough evidence yet, that:

1. The company has implemented a wage scale according to the stipulated wage scale.
2. Casual Daily Workers who have worked 21 working days or more for 3 consecutive months or more have been appointed as permanent worker
3. Sufficient number of licensed operators in accordance with regulations.

Root Cause Analysis (filled by organization audited):

1. The company has determined the 2022 wage scale structure but the application does not work according to the provisions, this is because the finance, operations and IT divisions do not yet understand the wage scale structure
2. High turnover and invalid e-KTP factors are the main considerations that the company does not immediately appoint all employees and also the simultaneous appointment will have a large cost impact, the company needs time to appoint all employees to PKWTT on permanent jobs in addition to the lack of labor causes workers to have to work in excess of applicable regulations, currently companies are always trying to recruit as many workers as possible.
3. Workers who were dispatched by the Sustainability division to take part in SIO boiler and sterilizer training have stopped working, even though previously the certificates given were only scanned. Apart from that, several workers received new assignments in other jobs. When new workers join, the PJK3 schedule is often not correct so they have to wait for the right schedule to depart and information from PJK3 regarding the minimum number of participants taking part becomes an obstacle to whether or not the training will run.
4. Lack of coordination between assistants, management units and local HCCS regarding employee transfers, especially regarding employees who already have competency.

Corrections (filled by organization audited):

1. Hold meetings to provide information regarding audit findings and understanding of audit improvements specific to the wage scale structure. It was agreed that starting in 2023 with the new wage scale, the payroll system must follow the provisions (Attachment 2022.1_a. MOM-Update Salary Slip and Wage Scale Structure rev.01). This will be requested from IT to be applied in employee payroll. (Attachment 2022.1_b. IT Changes Request Form Update Salary Slip for Non-Staff Employees – update).
2. Appointed 2 officers at the TPA on behalf of Jelita and Maria, officers at the TPA to become SKU (Attachment 2022.1_c. Identification, Program & Real Increase in Non-Harvest SKUs_JMS_v01), and Develop program plans and targets for hiring casual daily workers who are employed more than 21 days for 3 consecutive months. Priority:
 1. Main Types of Work
 2. Years of service
 3. Employee Absence.
 (Attachment 2022.1_c. Identification, Program & Actual Increase in Non-Harvest SKUs_JMS_v01)
 (Attachment 2022.1_d. Identification, Prog & Real Increase of SKU Panen_JMS_v01)
3. Sending employees to obtain operator training and certification on June 19 – 22 2023 (Attachment 2022.1_e. Genset Operator Training Certificate).
4. The Company issued an Internal Memo with No. 40/RC-INT/12/2022 regarding the prohibition on transferring positions of competent employees without RC and HCCS approval, and socialized to all managers (Attachment 2022.1_f. Memo RC_Prohibition of Transferring Employee Positions).

5. The company has identified casual workers who have worked more than 21 days for 3 consecutive months for harvesters and non-harvesters, and included them in the appointment program (Attachment 2022.1_g. Identify types of work that are more than 21 days_v02).

Corrective Action (filled by organization audited):

1. If it has been input into the system, it will not change again, and will be confirmed again next year to be immediately setup to adjust to the new wage scale.
2. HCCS will ensure that jobs with working hours that allow for continuous overtime will be appointed to PKWTT, following the appointment plan program prepared.
3. Starting to hand over training management to the HCCS Division, including arranging official ties, departures and communicating with the relevant PJ K3 so that training schedule arrangements will be better monitored.
4. The company has identified casual workers who have worked more than 21 days for 3 consecutive months and included them in the appointment program. **(Attachment 2022.1_g. Identify types of work that are more than 21 days_v02)**

- The company has shown Non-harvest SKU appointment program documents with a total of 516 workers in the process of being appointed (in total). Progress of the appointment of Non-Harvest SKUs is attached. **(Attachment 2022.1_c. Identification, Program & Real Increase in Non-Harvest SKUs_JMS_v01)**

To ensure that there are no more casual daily workers who work more than 21 for 3 consecutive months, company missue an IM from the Regional Controller to all Estate Managers and HCCS Managers not to employ BHL for more than 21 days for 3 consecutive months, if this happens then the BHL must be appointed as SKU. **(Attachment 2022.1_h. Rules Concerning PHL Employees)**

Assessor Evaluation and Conclusion (filled by auditor):

Auditor response dated February 7, 2023

1. Wage Scale

The company shows proof of improvement in the form of:

- Minutes of meeting regarding updates to salary slips and wage scale structure on 26 December 2022
- The wage scale and daily status employee classes are determined on January 2, 2023

2. Casual Workers absences

The company shows proof of improvement in the form of:

- Non-harvest SKU appointment program documents with a total of 516 workers who are in the process of being appointed
- Appointment letter for permanent workers with the initials JL (TPA officer) dated January 30 2023 and workers with the initials MAB (TPA officer) dated January 30 2023.

3. Compliance with regulations related to operator licensing

The company can present documents:

- Confirmation Letter No. 081/PTMI/CL/I/2023 which was signed by the Marketing Manager of PT Megatrains Indonesia on 20 January 2023. The document explains the plan for implementing class II steam aircraft operator training on 23-28 January 2023 which will be attended by 4 employees of PT Jaya Mandiri Sukses .
- Confirmation Letter No. 083/PTMI/CL/I/2023 which was signed by the Marketing Manager of PT Megatrains Indonesia on January 25 2023. This document explains the training plan for production aircraft operators which will be carried out in the period February – March 2023 and will be attended by 2 employees of PT Jaya Mandiri Sukses .

Auditee Response (26 February 2023):

1. An Fahairozi (harvest) worker's salary slip for January 2023, with the following explanation:
 - 5-day loss to follow-up deduction on January 9, 19, 23, 30 and 31 2023 (Rp. 652,887.26).
 - The HK deductions included in it are harvest fines in accordance with IM COO No.019/COO/Harvest Fines/III-2016 on 3, 4, 5, 7, 10, 11, 12, 13, 14, 16, 17, 18, 20, 24, 25, 26, 27, and 28 with a value of 715,654.44. Fines imposed: Fines for unripe fruit, long stalks, unarranged fruit, unharvested fruit, and sunflowers.

2. Salaries for workers a/n Marwan Hadi (harvest) for January 2023, with the following explanation:
 - 1 day loss to follow up deduction on January 31, 2023 (Rp. 130,558.22).
 - The HK deductions that are included are harvest fines in accordance with IM COO No. 019/COO/Harvest Fines/III-2016 on 3, 11, 12, 14, 18, 21, 28 and 30 with a value of Rp. 419,091. Fines imposed: Fines for unripe fruit, long stems, fruit not harvested, and fronds not arranged.
3. Deductions for employee absenteeism a/n Khotijah (maintenance) for January 2023, due to absenteeism on January 5 2023 (Did a fingerprint in the morning but didn't work so there was no afternoon fingerprint).

Verify 06 September 2023

Pay slip (sample) attached. Information on length of service is available in the pay slip (Attachment 2022.1_i. Salary Slip) Salary Slip The wage scale is not displayed because in the salary slip the Basic Salary has been increased according to the Wage Scale, according to the BHL Employee Type (Wage Scale + UMK/25 HK = Daily UMK Gapok (Monthly UMK Salary Slip)), SKU Employee Type (Wage Scale + UMK = Monthly UMK Gapok), and the employee on behalf of Irfan A has just been promoted to SKU in the period Jan 2023, his wages will be updated in February according to the Wage Scale.

Irfan's salary slip:

SLIP GAJI
Periode : January 2023

PT : PT. Jaya Mandiri Sukses Unit : Trembesi Estate Divisi : 1
 Nama : IRFAN A NIK : A0304 Tipe : SKUH
 Jabatan : Karyawan - Pemeliharaan TMK : 16-11-2017 Status : TK
 Bank : 002 No. Rek : 790001006467532 Cabang :

KEHADIRAN										
HKE Bl	Kerja	Sakit	Mangkir	Cuti	P1	P2	P3	P4	Bayar	Tidak
28.00	19.00	0.00	7.00	0.00	0.00	0.00	0.00	0.00	19.00	7.00

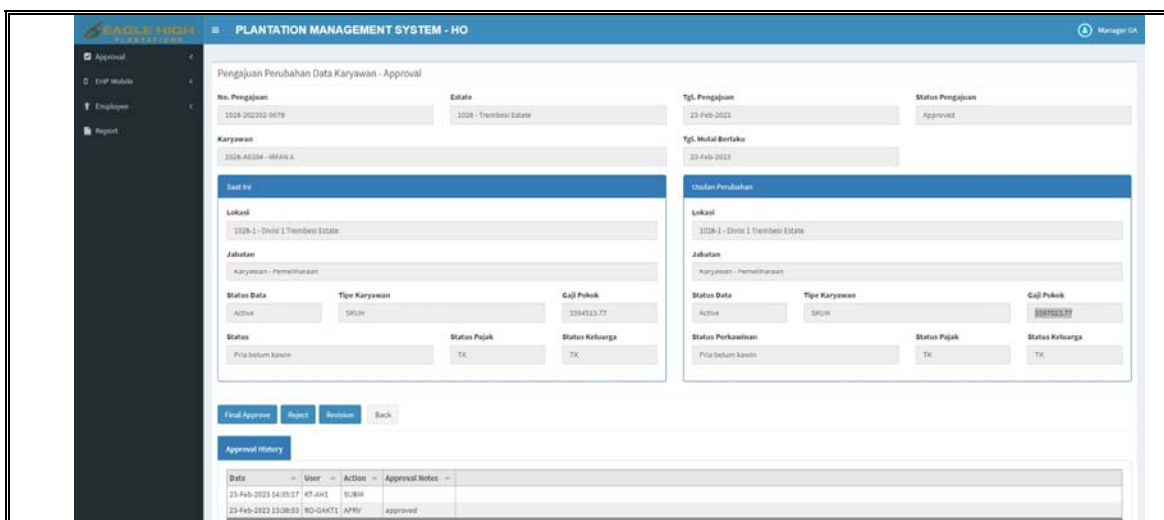
Pendapatan (A)		Potongan (B)	
Gaji Pokok	3.394.513.77	Hutang	0.00
Insentif Kehadiran	0.00	Hutang Angkang	0.00
Insentif Produktifitas Panen	0.00	Jamsostek Pegawai	323.836.61
Insentif Pusingan Tinggi	0.00	Natura	82.211.54
Lembur	0.00	Potongan Kurang HK	0.00
Natura	82.211.54	Potongan Mangkir	913.907.95
Premi Alat Berat	0.00	PPH21	0.00
Premi Borongan	0.00	Premi Kontanan	0.00
Premi Hadir	0.00		
Premi Kontanan	0.00		
Premi Mutat	0.00		
Premi Non Panen	0.00		
Premi Operator	0.00		
Premi Panen	0.00		
Premi Pokok Tinggi	0.00		
Premi Pruning	0.00		
Rapel Gaji SKUH	0.00		
THR	0.00		
Tunjangan Jabatan	0.00		
Tunjangan Jamsostek	222.001.20		
Jumlah (A)	3.698.726.51	Jumlah (B)	1.319.995.71
Jumlah Diterima (A - B)			2.378.730.80

Hambayatan dilakukan secara cash / transfer ke nomor rekening
 nomor rekening :
 Pembayaran : ☐ Cash Tanda Tangan
 ☐ Transfer
 IRFAN A

Change in Irfan's status:

REGIONBARU	COMPANYLAMA	COMPANYBARU	UNITCODELAMA	UNITNAMEBARU	UNITIDBARU	EMPID	EMPNAME	JABATANLAMA	JABATANBARU	TYPELAMA	TYPEBARU	TMK	TANGGALEFEKTIF	MASAKERJA
KALTIM1	PT. Jaya Mandiri Sukses	PT. Jaya Mandiri Sukses	1028	Trembesi Estate	TRBE	1028-A0304	IRFAN A	Karyawan - Pemeliharaan	Karyawan - Pemeliharaan	BHL	SKUH	11/16/2017	1/13/2023	5 Years 3 Months

Proposed changes to be included in the PMS system and will be paid in February 2023.



PLANTATION MANAGEMENT SYSTEM - HO

Pengajuan Perubahan Data Karyawan - Approval

No. Pengajuan: 1028-202302-0678 | Estate: 1028 - Trembesi Estate | Tgl. Pengajuan: 23-Feb-2023 | Status Pengajuan: Approved

Karyawan: 1028-AD04 - IRYANA, A. | Tgl. Mulai Bertugas: 23-Feb-2023

Isi Isi

Lokasi: 1028-1 - Estate 1 Trembesi Estate

Jabatan: Karyawan - Pemeliharaan

Status Data: Active | Tipe Karyawan: SKUM | Gaji Pokok: 3394513.77

Status: Pria belum kawin | Status Pajak: TK | Status Keluarga: TK

Uraian Perubahan

Lokasi: 1028-1 - Estate 1 Trembesi Estate

Jabatan: Karyawan - Pemeliharaan

Status Data: Active | Tipe Karyawan: SKUM | Gaji Pokok: 3394513.77

Status Perkelaminan: Pria belum kawin | Status Pajak: TK | Status Keluarga: TK

Final Approval:

Approval History

Date	User	Action	Approval Notes
23-Feb-2023 14:05:17	RT-JAQ	SUBM	
23-Feb-2023 13:08:33	RD-GAKT1	APRV	approved

Based on the explanation above, the nonconformity is declared Fulfilled and will be verified during the next assessment.

Verified by : Radytio Puspanjana

NCR No.	: 2022.2	Issued by	: Rizliani Aprianita Hsb
Date Issued	: 18 November 2022	Time Limit	: Next assessment
NC Grade	: Minor	Date of Closing	: 10 July 2023
Standard Ref. & Requirement	2.2.2 All contracts, including those with FFB suppliers, have separate clauses regarding fulfillment of relevant legal obligations, and can be verified by the third party concerned.		
Evidence observed (filled by auditor): The company shows several work agreements with third parties, such as: <ul style="list-style-type: none">Agreement No. 051/09/2022/Lokal-JMS JMSE-Muat TBS ADD1 on November 1, 2022 for FFB loading workAgreement No. 0052/JMS-TRBE/IX/2022 – Addendum Tunas Pokok on November 10, 2022 for pruning workAgreement No. 0076/X/2022/Lokal-JMS TRBE/sewa excavator on November 10, 2022 for excavator rental workAgreement No. 0075/X/2022/Lokal-JMS TRBE/Sewa grader on November 10, 2022 for grader rental workAgreement No. 063/10/2022/local-JMS JMSE/Pruning on November 1, 2022 for pruning work <p>In the agreement mentioned above, it has been explained that contractors are required to comply with labor, environmental, legal regulations including meeting minimum wages, prohibiting the use of child labor, forced labor, involving employees in the BPJS program, providing PPE and others.</p> <p>In addition, the company shows agreement with FFB suppliers, for example agreement No. 004/JMS-CV Bumi Gatah Permai/TBS/IV/2022 dated 29 April 2022. And there is no clause regarding fulfillment of relevant legal obligations.</p>			
Non-Conformance Description (filled by auditor): Based on the explanation above, it is concluded that there is not yet sufficient evidence that agreements with FFB suppliers have separate clauses regarding the fulfillment of relevant legal obligations. In addition, the fulfillment of relevant legal obligations cannot be proven by third parties, both contractors and FFB suppliers.			
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none">The SPK with CV Bumi Gatah Permai is an on-going contract for ongoing work so it has not been adapted to the new contract format which includes clauses in accordance with RSPO P&C provisions.Contractors have not been socialized about the provisions of RSPO certification so that the documents requested by companies in order to fulfill RSPO certification have not been provided because they are considered sensitive or confidential.			
Corrections (filled by organization audited): <ul style="list-style-type: none">Include the clauses required by the RSPO in the SPK for new employment with CV Bumi Gatah Permai(Attachment 2022.2_a. SPK CV Bumi Gatah Permai (28 April 2023))The company is making gradual improvements regarding the fulfillment of relevant legal obligations that must be fulfilled by TBS contractors/suppliers as follows:<ul style="list-style-type: none">✓ Socialization to FFB contractors and suppliers who are still bound by work agreements so that they can understand and carry out the fulfillment of legal obligations and the company's commitment to implementing RSPO certification on November 8, 2022. (Attachment 2022.2_b. BA Outreach to local contractors and farmers)✓ issued regulations that need to be fulfilled by FFB contractors/suppliers who will be contracted by the company in the form of IM No. 33/RC-EXT/11/2022 dated 7 November 2022. (Attachment 2022.2_c. IM Contractor Control Mechanism) <p>Review the fulfillment of legal obligations and RSPO P&C requirements for all FFB contractors/suppliers contracted by the company on 10 November 2022. (Attachment 2022.2_d. Management Review (Contractor Assessment</p>			

Due Diligence))	
<p>Corrective Action (filled by organization audited):</p> <p>The company provides assistance to contractors and FFB suppliers to encourage compliance with RSPO requirements, the implementation of which will be monitored regularly through RSPO internal audit activities.</p>	
<p>Assessor Evaluation and Conclusion (filled by auditor):</p> <p>Verify July 10, 2023</p> <p>Evidence of improvement can be shown in the form of:</p> <ul style="list-style-type: none"> - Add SPO required clause in SPK for new employment with CV Bumi Gatah Permai. The obligation to fulfill applicable regulations is regulated in article 7 concerning second party guarantees. (Attachment 2022.2_a. SPK CV Bumi Gatah Permai (28 April 2023)) - Socialization to FFB contractors and suppliers who are still bound by work agreements so that they can understand and carry out the fulfillment of legal obligations and the company's commitment to implementing RSPO certification on November 8, 2022. (Attachment 2022.2_b. BA Outreach to local contractors and farmers) - Issued regulations that need to be fulfilled by FFB contractors/suppliers who will be contracted by the company in the form of IM No. 33/RC-EXT/11/2022 dated 7 November 2022. (Attachment 2022.2_c. IM Contractor Control Mechanism) - Review the fulfillment of legal obligations and RSPO P&C requirements for all FFB contractors/suppliers contracted by the company on 10 November 2022. (Attachment 2022.2_d. Management Review (Contractor Assessment Due Diligence)) <p>In relation to the proof of improvement submitted, the nonconformity in this indicator is declared to have been met and will be further verified during the next assessment.</p>	
Verified by	: Radytio Puspanjana

NCR No.	: 2022.3	Issued by	: Rizliani Aprianita Hsb
Date Issued	: 18 November 2022	Time Limit	: Next assessment
NC Grade	: Minor	Date of Closing	: July 10, 2023
Standard Ref. & Requirement	2.2.3 All contracts, including those with FFB suppliers, have separate clauses that prohibit practices involving child, forced or trafficked labour.		
Evidence observed (filled by auditor): The company shows several work agreements with third parties, such as: <ul style="list-style-type: none">Agreement No. 051/09/2022/Lokal-JMS JMSE-Muat TBS ADD1 on November 1, 2022 for FFB loading workAgreement No. 0052/JMS-TRBE/IX/2022 – Addendum Tunas Pokok on November 10, 2022 for pruning workAgreement No. 0076/X/2022/Lokal-JMS TRBE/sewa excavator on November 10, 2022 for excavator rental workAgreement No. 0075/X/2022/Lokal-JMS TRBE/Sewa grader on November 10, 2022 for grader rental workAgreement No. 063/10/2022/local-JMS JMSE/Pruning on November 1, 2022 for pruning work. <p>In the agreement mentioned above, it has been explained that contractors are required to comply with labor, environmental, legal regulations including meeting minimum wages, prohibiting the use of child labor, forced labor, involving employees in the BPJS program, providing PPE and others.</p> <p>In addition, the company shows agreement with FFB suppliers, for example agreement No. 004/JMS-CV Bumi Gatah Permai/TBS/IV/2022 dated 29 April 2022. However, there is no clause regarding the prohibition of practices involving child labour, forced labour, and workers from human trafficking.</p>			
Non-Conformance Description (filled by auditor): Based on the explanation above, it is concluded that there is not enough evidence yet that the agreement with the FFB supplier has a clause regarding the prohibition of practices involving child labor, forced labor, and workers from human trafficking.			
Root Cause Analysis (filled by organization audited): The SPK with CV Bumi Gatah Permai is an on-going contract for ongoing work so it has not been adapted to the new contract format which includes clauses in accordance with RSPO P&C provisions.			
Corrections (filled by organization audited): Include the clauses required by the RSPO in the SPK for new employment with CV Bumi Gatah Permai. (Attachment 2022.3. SPK CV Bumi Gatah Permai (28 April 2023)).			
Corrective Action (filled by organization audited): Corrective action (completed by the audited organization): The company, through the Sustainability Dept., will ensure that all applicable SPKs are in placeinclude clauses in accordance with RSPO P&C provisions whose implementation will be monitored periodically through RSPO internal audit activities.			
Assessor Evaluation and Conclusion (filled by auditor): Verify July 10, 2023 Evidence of improvement can be shown in the form of: <ul style="list-style-type: none">Add RSPO required clause in SPK for new employment with CV Bumi Gatah Permai. The obligation to fulfill applicable regulations is regulated in article 7 concerning second party guarantees. (Attachment 2022.2_a. SPK CV Bumi Gatah Permai (28 April 2023))Socialization to FFB contractors and suppliers who are still bound by work agreements so that they can understand and carry out the fulfillment of legal obligations and the company’s commitment to			

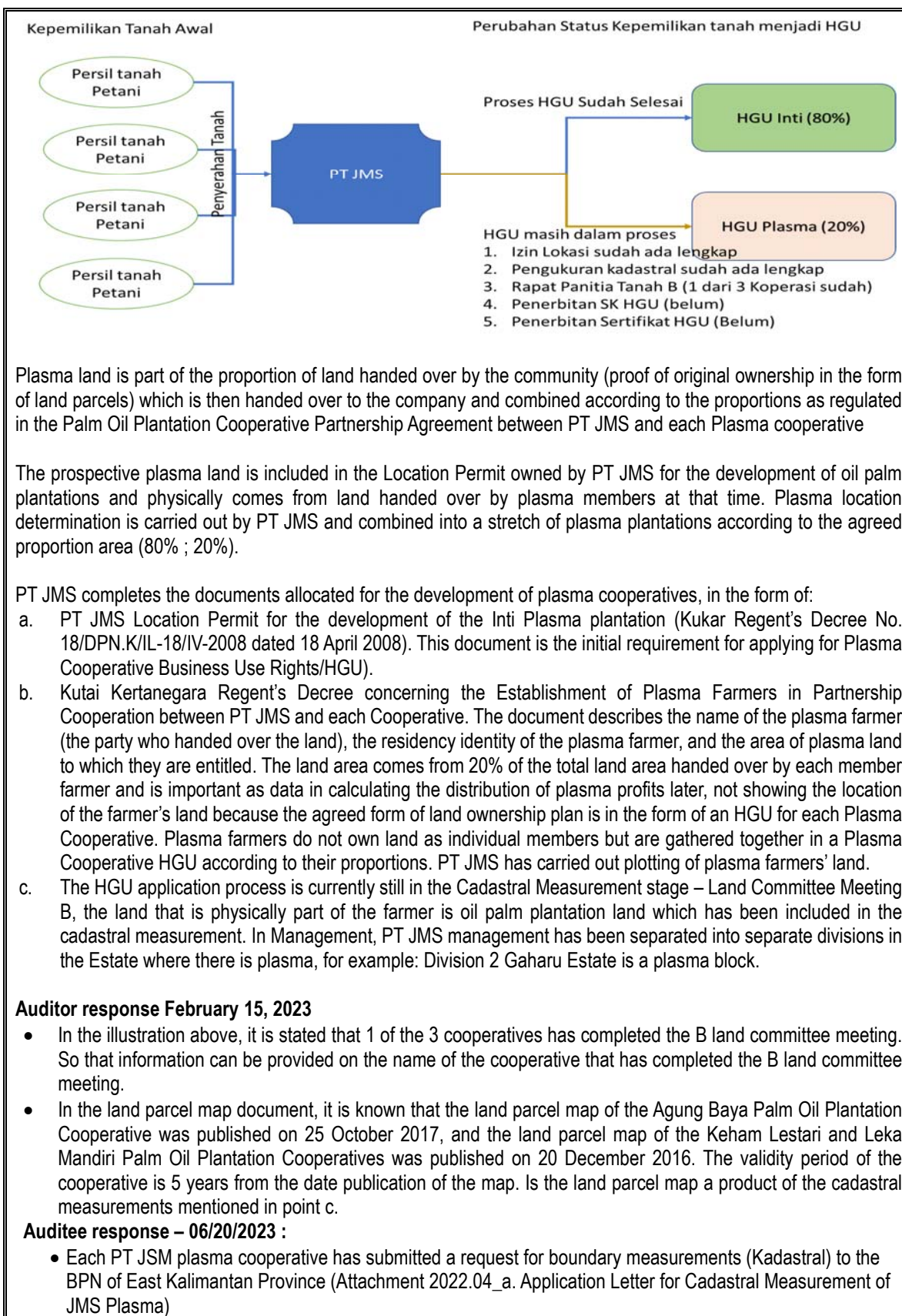
implementing RSPO certification on November 8, 2022. (**Attachment 2022.2_b. BA Outreach to local contractors and farmers**)

- Issued regulations that need to be fulfilled by FFB contractors/suppliers who will be contracted by the company in the form of IM No. 33/RC-EXT/11/2022 dated 7 November 2022. (**Attachment 2022.2_c. IM Contractor Control Mechanism**)
- Review the fulfillment of legal obligations and RSPO P&C requirements for all FFB contractors/suppliers contracted by the company on 10 November 2022. (**Attachment 2022.2_d. Management Review (Contractor Assessment Due Diligence)**)

In relation to the proof of improvement submitted, the nonconformity in this indicator is declared to have been met and will be further verified during the next assessment.

Verified by	:	Radytio Puspanjana
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NCR No.	: 2022.4	Issued by	: Asystasya Aishah Silalahi
Date Issued	: 18 November 2022	Time Limit	: 12 Month (Recommendation 9 Month)
NC Grade	: Major	Date of Closing	: July 10, 2023
Standard Ref. & Requirement	2.3.1 For all FFB obtained from direct suppliers, the Palm Oil Mill (PKS) requires: <ul style="list-style-type: none">• Information regarding the geolocation of the origin of FFB;• Evidence of status of ownership or rights/claims to land by the growers/farmers;• Where relevant, a valid planting/operational/trade permit, or as part of a cooperative so that buying and selling of FFB can be carried out		
Evidence observed (filled by auditor): Based on the list of internal and external FFB suppliers, it is known that the company receives FFB from direct suppliers, including plasma cooperatives Leka Mandiri, Keham Lestari, and Agung Baya. The company then showed examples of parcel maps of members of the Leka Mandiri Cooperative. The company has also indicated the coordinates for the four cooperatives. In addition, there is also a sample document for the business entity permit for the Agung Baya Cooperative based on the Deed of Establishment of the Agung Baya Palm Oil Cooperative which was approved by the State Minister for Cooperatives and Small and Medium Enterprises in accordance with Decree No. 500/34/BH-01/IV/2006 dated 18 April 2006. However, the company has not shown proof of the land ownership status of the plasma cooperative.			
Non-Conformance Description (filled by auditor): The company has not been able to show evidence of the land ownership status of the scheme smallholder			
Root Cause Analysis (filled by organization audited): The PT JMS plasma scheme/scheme is a full managed system partnership pattern, with a land status plan in the form of Cultivation Rights (HGU) in the name of each Plasma Cooperative including AMDAL documents which is also the scope of the PT JMS plasma plantation development study.			
Auditor response February 15, 2023 So that you can add an explanation or revise the editorial sentence on the root of the problem so that it is in accordance with the corrective action that has been made.			
Auditee Response 06/19/2023: (revised Root of Problem) Proof of ownership of the Leka Mandiri, Keham Mandiri and Agung Baya plasma lands cannot yet be shown because they are still in the process of applying for HGU, which is currently at the stage of submitting cadastral measurements.			
Corrections (filled by organization audited): Illustration of changes in the status of ownership of land owned by the community (Plasma Farmers) from initially being a parcel letter to HGU (in process).			



- The Leka Mandiri Cooperative has completed its land inspection inventory, and a Committee B meeting is scheduled. (**Attachment 2022.04_b. Pan B Activity Schedule February – March (Leka Mandiri Cooperative)**)
- The Keham Lestari Cooperative has carried out a land inspection inventory, but due to internal problems in the cooperative, the continuation process has been hampered.
- The Agung Baya Cooperative has submitted an HGU application but has not had time to carry out a land inspection inventory because it has been hampered by the Covid 19 outbreak (for more than 2 years BPN has not carried out land inspection inventory activities).

The Agung Baya Cooperative land plot map 25 October 2017 and the Leka Mandiri and Keham Lestari plot maps 20 December 2016 are BPN cadastral measurement products, valid for 5 years. The Agung Baya and Keham Lestari maps will be re-measured because their validity period expires before the Committee B meeting is scheduled, while the Leka Mandiri plot map can still be used to continue the HGU process (even though the validity period has expired) because it has already been scheduled by the Committee. B.

Corrective Action (filled by organization audited):

The CSR & Plasma Department will monitor and document the progress of the HGU application for PT JMS plasma land.

Assessor Evaluation and Conclusion (filled by auditor):
Auditor Verifications on February 15, 2023

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

- Kutai Kartanegara Regent Decree No. 188.9/525.26/341/DISBUNHUT concerning the Determination of Plasma Farmer Partnership Cooperation between the Agung Baya Palm Oil Cooperative and PT Jaya Mandiri Sukses which was stipulated on January 29 2013. Based on this decree, the area of the Agung Baya cooperative was determined to be 430.12 Ha with 1,300 families of farmers.
- Kutai Kartanegara Regent Decree No. 188.4/525.26/335/Disbunhut concerning the Determination of Plasma Farmer Partnership Cooperation between the Agung Baya Palm Oil Cooperative and PT Jaya Mandiri Sukses which was stipulated on January 29 2013. Based on this decree, the area of the Agung Baya cooperative was determined to be 852.78 Ha with 581 families of farmers.
- Kutai Kartanegara Regent Decree No. 188.4/525.26/781/DISBUNHUT concerning the Determination of Plasma Farmer Partnership Cooperation between the Keham Lestari Palm Oil Cooperative and PT Jaya Mandiri Sukses which was stipulated in May 2013. Based on this decree, the area of the Keham Lestari cooperative was determined to be 736.50 Ha with 1,303 families of farmers.
- Kutai Kartanegara Regent Decree No. 503/11/SK-DBN.CP/II/2011 concerning the Determination of Plasma Farmer Cooperation Partnership between the Leka Mandiri Palm Oil Cooperative and PT Jaya Mandiri Sukses which was stipulated on January 11 2011. Based on this decree, the area of the Leka Mandiri cooperative was determined to be 538.18 Ha with as many farmers as 1,303 families.
- Map of land plots for the Keham Lestari and Leka Mandiri Palm Oil Cooperatives published by the National Land Agency of East Kalimantan Province on 20 December 2016 and valid for 5 years from publication.
- Map of land parcels for the Sawit Agung Baya Cooperative published by the National Land Agency of East Kalimantan Province on 25 October 2017 and is valid for 5 years from publication.
- NIB for each cooperative.

However, there are still auditor questions that need to be answered again by the company in the root cause analysis and correction section. Therefore, the discrepancy is still not satisfied.

Verify July 10, 2023

Can be shown clarification from the company regarding the root of the problem, corrective actions. In this regard, the discrepancy in this indicator is declared to have been fulfilled.

Verified by : **Radytio Pupanjana**

NCR No.	: 2022.5	Issued by	: Asystasya Aishah Silalahi
Date Issued	: 18 November 2022	Time Limit	: Next Assessment
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 3.2.2 As part of the continuous monitoring and improvement process, an annual report is submitted to the RSPO Secretariat by the Certification Body during the annual audit, using the RSPO metric template format.		
Evidence observed (filled by auditor): The company has shown PT JMS's RSPO Metrics Template version 2.1 document for the January – December 2021 data entry period. However, some of the data contained in the RSPO Metrics Template still does not match the actual data verified during stage -02, for example: <ul style="list-style-type: none"> • HCV data in the Metrics Template is 355 Ha, while in the 2022 hectare statement the area of HCV is 950.19 ha • Total production area (ha) data in the Metrics Template is 8,262 Ha, while in the 2022 hectare statement the HCV area is 9,518 ha • The number of certified estates is 3 units, while the number of estates to be certified is 6 units. • The data for planted peatland area (ha) in the Metrics Template is 4475 Ha, while in the peat inventory document the peat area is 4346 ha. • Name of RSPO member PT Eagle High Plantation and Name of certified unit Eagle High Plantation Palm Oil Mill, while the scope of PT Jaya Mandiri Sukses's certification is for Bangkirai POM. 			
Non-Conformance Description (filled by auditor): The company can show PT JMS's RSPO Metrics Template version 2.1 document for Bangkirai POM, but it does not match the actual data at the time the IC audit was carried out.			
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):			
Follow up on next audit (filled by auditor):			
Verified by	:		

NCR No.	: 2022.6	Issued by	: Radytio Puspanjana
Date Issued	: 18 November 2022	Time Limit	: Next Assessment
NC Grade	: Minor	Date of Closing	: 25 June 2023
Standard Ref. & Requirement	: 3.4.2 For units of certification, social and environmental impact assessment documents are available and management and monitoring plans have been developed with the participation of affected stakeholders.		
Evidence observed (filled by auditor):			
<ul style="list-style-type: none">- As a form of social management the company has developed/compiled by involving independent parties in conducting social impact assessments related to the company's operational activities. In the social study, the affected villages were Lebak Cilong Village, Lebak Former Village, Muara Leka Village, Perian Village, Kayu Batu Village, and Muara Aloh Village. The social impact assessment was first carried out in January 2012 by Sonokelin as a follow-up to the results of the assessment, there are several recommendations / matrices for social impact management and monitoring plans, including: Internal impact<ul style="list-style-type: none">• OHS• Implementation of SOP• housing, clean water• social facilities• improvement of human resourcesExternal impact<ul style="list-style-type: none">• Use of local labor• Transparency in the purchase price of FFB• Environmental degradation• CSR• Population administration.			
As one of the efforts to improve and pay attention to the latest situation from 2012 the company carried out the Social Impact Review and Implementation which was carried out in 2020, where this was due to the dynamic social situation. The SIA review results cover 38 activities, for example: <ul style="list-style-type: none">- Identify constraints and barriers to community infrastructure development- Community involvement in the preparation of CSR- Assistance in plasma financial management- Designing long-term village programs- Monitor the surface water quality of the surrounding community- Make plantation SOP, discipline and K3- Provide explanations regarding company policies to the public- Treat every employee as important part- Provide appropriate salary and benefits to employees- Maintain employee facilities- Regular visits to employees- Work accident data collection- Employee health check.			
The SIA review was carried out by involving the surrounding community, in a group discussion forum activity which was carried out on July 6 2021. The stakeholders involved in the activity were the Village Secretary of Muara Leka, SMP N 1 teacher, KA UPT Disbun, community leaders and traditional leaders.			
The company also shows the SIA Planning and Monitoring matrix for 2021, namely: External			

- The proportion of labor
- TSB price transparency
- Decline in environmental quality
- CSR and social assistance
- Orderly population administration

Internals

- Application of safety standards
- SOP and corporate culture
- Housing, clean water and social facilities
- Adequacy and quality of human resources.

In an effort to follow up on the 2020 SIA review recommendations, the company has developed a social management and monitoring plan for 2021, but in the process of preparing the document it was discovered that:

- External stakeholders involved in preparing social management and monitoring plans are still limited to a number of affected stakeholders, for example, only Muara Leka village (Sekdes, teachers, traditional leaders and community leaders). Meanwhile, based on the scope of the 2012 SIA study, the villages affected were Lebak Cilong Village, Lebak Former Village, Muara Leka Village, Perian Village, Kayu Batu Village, and Muara Aloh Village and had not considered the parties who were widely affected, for example women, the government, plasma farmers, parties who use water resources around, and cultivators.
- Internal stakeholders have not been directly involved in the management plan and social monitoring.

So that with the limited number of parties involved in preparing the social management and monitoring plan, there are several issues that have not been identified that have been monitored and managed in a comprehensive and integrated manner, for example:

- Issues regarding wages and employee BPJS.
- Issues regarding labor status.
- Issue regarding OHS implementation.
- Employee housing facilities.

Non-Conformance Description (filled by auditor):

The social impact management and monitoring plan has not been developed in a participatory manner by involving all stakeholders who are widely affected so that there are several issues that have not been identified that have been monitored and managed in a comprehensive and integrated manner.

Root Cause Analysis (filled by organization audited):

- The 2021 period is still during the COVID-19 pandemic so visits to villages/villages are still very limited and priority is given to activities to deal with the impact of the COVID-19 pandemic..
- In 2018, the Social Team focused on monitoring internal social impacts as stated in the SIA document and all company resources were diverted to activities to handle the impact of the COVID-19 pandemic.

Corrections (filled by organization audited):

In the December 2022 period, the CSR-Plasma Dept. will conduct a social survey of surrounding villages by giving questionnaires to residents of 6 villages, around 15 people each, taking into account gender representatives, government, plasma farmers, water resource users and the cultivator.

Complete the SIA evaluation report by adding issues that arise internally within the company during 2022.

Necessary data :

1. Plans and realization of BPJS Employee registration as of the end of December 2022.
2. Employee wage structure and scale policies.
3. Plans and realization of hiring daily workers until December 2022.
4. Realization of the K3 program in 2022.
5. Plans and realization of improvements to employee housing facilities until December 2022.

Corrective Action (filled by organization audited):

The CSR&Plasma team ensures that the annual SIA implementation report document includes the points contained in the SIA document (internal and external), involves residents of the 6 surrounding villages and issues that developed during the SIA program implementation period.

The CSR&Plasma team ensures that social (internal) issues that develop during the current year are included in the SIA Implementation Realization Report every year.

Assessor Evaluation and Conclusion (filled by auditor):

Verify June 25, 2023

The company shows proof of improvement in the form of:

- PT JMS monograph SIA questionnaire form which explains village demographics such as data on village area, gender of village residents, livelihoods, education level, infrastructure, transportation, institutions. Demographic data for Lebak Mantan village, Kayu Batu village, Muara Leka and Perian village.
- The 2022 SIA report which explains the realization of the SIA program in 2022, the activities carried out are:
 - Identify infrastructure bottlenecks
 - Inviting the community to maintain infrastructure
 - Evaluate the success of the program with the community.
 - Involving the community in designing CSR programs
 - Assistance in financial management of plasma farmers
 - Economic potential training for the community
 - Providing skills to the community
 - Planning long-term community empowerment programs.
 - Identify economic potential
 - Entrepreneurship training
 - Evaluate the level of success of the program
 - Introducing new business opportunities
 - Do not apply chemicals near water sources
 - Monitor the quality of water used by the community
 - Implementation of K3
 - Provide explanations regarding company policies
 - Provide space for aspiration
 - Treating every employee as an important part.
 - Provide opportunities for each employee to improve themselves
 - Give rewards to employees
 - Provide training
 - Adjust salaries and benefits
 - Pay attention to the quality of rice given to employees
 - Maintenance of public facilities and monitoring
 - Regularly visit employees to find out the condition of employee facilities
 - Compensation and compensation
 - Determine employee rights according to regulations
 - Collecting work accident data every year
 - Do a health check
 - Carrying out data on work accidents in bulking waters every year
 - Comparison of UMR for plantations and PKS
 - Monitoring the security and anxiety of village communities.

Based on the explanation above, the nonconformity is declared to have been fulfilled and will be verified again during the next assessment

Verified by : **Radytio Puspanjana**

NCR No.	: 2022.7	Issued by	: Radytio Puspanjana
Date Issued	: 18 November 2022	Time Limit	: 12 Month (Recommendation 9 Month)
NC Grade	: Major	Date of Closing	: July 10, 2023
Standard Ref. & Requirement	: 3.6.2 Monitored the effectiveness of OHS plans to address OHS risks in people.		
Evidence observed (filled by auditor):			
Medical examination			
<ul style="list-style-type: none">- Based on the results of verification of the employee list document for the period October 2022, it is known that there are 437 employees working at Gaharu Estate.- Based on the results of field observations and interviews with spray workers in Block W42, Division 2, Bangkirai Estate, it is known that there are spray workers with the initials BLF and VCO who have not received special medical examination facilities.- The company can show evidence related to a general medical examination at PT Jaya Mandiri Sukses, for example a general health examination for the Gaharu Estate unit which was carried out on 17-20 June 2022 for 216 workers.- Companies can also show special medical examinations (audiometry, cholinesterase, spirometry) at PT Jaya Mandiri Sukses, for example at Bangkirai Estate:<ul style="list-style-type: none">• Cholinesterase-spirometry examination for 9 spray employees and 2 warehouse staff.• Spirometry examination for 8 fertilizer employees.• Audiometric inspection for 2 generator operator employees. <p>Based on the verification results, there were 2 spray workers with the initials BLF and VCO who had not received special medical examination facilities (cholinesterase-spirometry).</p>			
Harvest-Fertilizer and Spray-Harvest activities in one block			
<ul style="list-style-type: none">- Based on the results of field observations in Block T51/52, Division 2, Angsana Estate, it is known that there are simultaneous fertilizer-harvesting and spray-harvesting activities in Block T51/52. Based on the verification of the risk identification documents, it was discovered that the risks had not been 100% for the fertilizer-harvesting and spray-harvesting activities carried out in 1 block.- Furthermore, there is no warning of spray application areas for spraying activities in Block T51/52, Division 2, Angsana Estate.- Based on the results of interviews with the management unit, it was found that there were concurrent activities in one block because around 70% of the Angsana Estate area was inundated as a result of high rainfall in the October period, which disrupted the harvest-spray-fertilizer rotation.			
Occupational Accidents of workers with BHL status (contract worker)			
<ul style="list-style-type: none">- Based on the results of field observations and interviews with harvest workers at Jatimas Estate, it is known that there are harvest workers with the initials INN (Harvest – contract worker) who experience work accidents when they are struck by FFB on their heads, so they are included in the majority category.- Based on the results of a review of OSH and environmental incident investigation documents, it is known that a worker with the initials INN had a work accident on July 20, 2022.- Based on the results of a review of the P2K3 meeting minutes document on August 15, 2022, it is known that the meeting did not discuss the incident of a work accident that happened to the INN.- Based on the results of a review of P2K3 reporting documents for Quarter 3 for the 2022 period, it is known that there is no information on work accidents that have happened to workers with the initials INN in the work accident reports.			

Non-Conformance Description (filled by auditor):

There is not enough evidence that the company has monitored the effectiveness of the OSH plan to deal with OSH risks.

Root Cause Analysis (filled by organization audited):
Employee health checks:

When the public meeting was held, many employees were unwilling to attend because they were sick, afraid of being examined, and were pursuing targets. This is also the reason for a special mcu for 2 workers a/n BLF and VCO.

Practice 2 work activities and 1 block:

This incident of operational activities has never happened before, because around 70% of the Angsana estate was flooded due to high rainfall, operational activities were disrupted, and the work area became narrow, resulting in 2 work activities in 1 block, and this is actually risky for workers.

Narrative revision Practice 2 work activities and 1 block:

Two types of work are carried out simultaneously in one block, namely to catch up on delays in work rotation (especially harvesting, fertilizing and maintenance/spraying pesticides), where the delay in rotation is caused by flooding/inundation conditions in the area/block. In the long term. This condition has never happened before, so the company has not included the harvest-fertilizer and spray-harvest activities carried out in 1 block into HIRAC. And warnings for spray application areas are available but are not consistently carried out by the team in the field.

Work accidents for workers with BHL status

The Sustainability Assistant forgot to include and discuss it in the P2K3 Meeting, due to the busy schedule of audits in the region, proper assessments and related official visits.

Auditor's note dated February 7, 2023.

Point a Harvest-Fertilizer and Spray-Harvest activities in one block. The description of the root cause analysis does not repeat the description contained in the observed evidence information.

Auditee Response – March 20 2023 :

The narrative at the root of the problem has been revised.

Corrections (filled by organization audited):
Employee health check:

- Carrying out advanced general maintenance at the company which will be carried out from 26 December 2022 – 7 January for 2,791 workers. (**Attachment 2022.7_a. BA MCU Fisik_PT JMS_26 Dec 22-07 Jan 23**)
- Carrying out a special MCU on 15-17 December 2022 for all workers who must be examined including BLF and VCO and the results of doctor's recommendations for workers with fit with note. (**Attachment 2022.7_b. BA MCU Khusus_PT JMS_15-17 Dec 22**)

Practice 2 work activities and 1 block:

- Management decided to issue a SE prohibiting work with activities (one of which uses chemicals) carried out simultaneously with other work activities. (**Attachment 2022.7_c. SE_RC_37_Lar_Join_Spray Jobs with others**).
- Create a signboard for the spray application area and install it. (**Attachment 2022.7_d. BA Socialization of Spray Location Signs**)

Employee work accidents

Discussed in the minutes of the P2K3 meeting in October 2023, providing an evaluation to serve as an appeal so that it does not happen again, this report is included in the reporting for Quarter IV-2022 and reported to the local

Manpower Office. (Attachment 2022.7_e. Lap_P2K3_JMS_IV_22 + Receipt)

Corrective Action (filled by organization audited):

Employee Health Check:

Make an IM regarding MCU, that every worker is obliged to carry out MCU, otherwise they are not allowed to work. (Attachment 2022.7_f. RC_Memo Obligation of All Employees to Perform MCU)

Practice 2 work activities and 1 block:

Disseminate the Circular to all Managers so that daily work plans do not combine this risky work. (Attachment 2022.7_g. BA_So_SE_RC_37_Lar_Join_Jobs Spray with others)

Auditee Response – March 20 2023 :

Incorporate these activities into HIRAC

Re-socialize the use of this warning to all employees, so that they know the function and use of this warning

Work accidents for workers with BHL status

Adding SKU/non-staff staff in the Sustainability Division to help provide reminders regarding the management of workforce accidents, including administration work.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor response dated February 7, 2023

Medical examination

The company can present documents:

- Memorandum No. 05/RC-INT/01/2023 dated January 10 2023 concerning the Obligation of All Employees to Carry Out Health Checks.
- Socialization of the Obligation of All Employees to Have a Health Check (MCU) which was held on January 20 2023 and was attended by 23 participants.
- Minutes of Work Completion (BAPP) Medical Check Up No. 002/MCU-LAP/KK/XII/2022 between PT JMS and Kumala Clinic, Samarinda, East Kalimantan. Based on the results of document verification, it is known that a special health examination (cholinesterase, spirometry and audiometric) was carried out on 15-17 December 2022 with details:
PT Jaya Mandiri Sukses
Cholinestrace: 70
Spirometry: 349
Audiometry: 161

Harvest-Fertilizer and Spray-Harvest activities in one block

The company can present documents:

- Circular No. 37/RC-INT/12/2022 dated 1 December 2022 concerning Prohibition of combining spray work with other work.
- Socialization of the prohibition on combining spray work with other work was carried out on December 9 2022 and was attended by 24 participants.
- Socialization of location signs for spray work was carried out on January 21 2023 and was attended by 7 participants.

Auditor response on 17 March 2023

Work accidents for workers with BHL status

The company can show the fourth quarter P2K3 Report document which has informed about work accidents in the period July 2022. This document has been received by the Manpower and Transmigration Service of Kutai

Kertanegara Regency and East Kalimantan Province on January 5 2023.

Based on the results of verification of corrections and corrective actions, it is known that the company has carried out corrections to non-conformities and corrective actions so that non-conformities do not recur, however there are still points of identifying the root of the problem which are noted by the auditor. Based on this, a discrepancy in this indicator is declared **unfulfilled**.

Auditee Response – 20.06.2023 : (revisions have been made to the root of the problem narrative)

Add to HIRAC the harvest-fertilizer and spray-harvest activities which are carried out simultaneously in 1 block
Socialize again to supervisors and spray teams to always provide signs or warnings in the spray application areas that have been provided.

Verify July 10, 2023

Based on the results of verification of root cause analysis, corrections and corrective actions, it is known that the company has identified the causes of nonconformities and carried out corrections to nonconformities and corrective actions so that nonconformities do not recur. Based on this, a discrepancy in this indicator is declared **has been fulfilled** and will be observed in subsequent audit activities.

Verified by	:	Radytio Puspanjana
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NCR No.	:	2022.8	Issued by	:	Rizliani Aprianita Hsb
Date Issued	:	18 November 2022	Time Limit	:	12 months (9 month recommendation)
NC Grade	:	Major	Date of Closing	:	July 10, 2023
Standard Ref. & Requirement	:	3.7.1 A documented training program is in place for all staff, workers, smallholders and outgrowers taking into account specific gender needs and covering aspects of the RSPO principles and criteria in a form they can understand and includes an assessment of the training.			
Evidence observed (filled by auditor): -					
Non-Conformance Description (filled by auditor): The company has not been able to show a training program for all staff, plasma workers, smallholders and outgrowers covering aspects of the RSPO principles and criteria.					
Root Cause Analysis (filled by organization audited): Training program documents are still being documented by HCCS and have not been well coordinated in document archiving.					
Corrections (filled by organization audited): <ul style="list-style-type: none"> - 2022 Training Program Document which informs the type of training, material providers, participants and implementation plans (Attachment 2022.8_a. 2022 Training Program). - The company has prepared a 2023 training program for all staff, workers, plasma and contractors/suppliers covering aspects of the RSPO P&C. <ul style="list-style-type: none"> • Attachment 2022.8_b. PT JMS Kebun Training and Socialization Program in 2023 • Attachment 2022.8_c. PT JMS PKS Training and Socialization Program in 2023 					
Corrective Action (filled by organization audited): Dept.Sustainability will ensure training programs cover aspects of the RSPO P&C that has been prepared annually and its filing will be monitored periodically through internal audit activities.					
Assessor Evaluation and Conclusion (filled by auditor): Verification date February 15, 2023 The company shows proof of improvement in the form of: <ul style="list-style-type: none"> - 2022 Training Program Document which informs the type of training, material providers, participants and implementation plans. Auditor response <ul style="list-style-type: none"> - Is there any training intended for plasma farmers? - Is there a training program for 2023? Auditee Response – March 20, 2023 <ul style="list-style-type: none"> - Answered in Correction Verify July 10, 2023 <ul style="list-style-type: none"> - The company has prepared a 2023 training program for all staff, workers, plasma and contractors/suppliers covering aspects of the RSPO P&C. <ul style="list-style-type: none"> • Attachment 2022.8_b. PT JMS Kebun Training and Socialization Program in 2023 • Attachment 2022.8_c. PT JMS PKS Training and Socialization Program in 2023 Based on the results of verification of root cause analysis, corrections and corrective actions, it is known that the company has identified the causes of nonconformities and carried out corrections to nonconformities and corrective					

actions so that nonconformities do not recur. Based on this, a discrepancy in this indicator is declared **has been fulfilled** and will be observed in subsequent audit activities.

Verified by	:	Radytio Puspanjana
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NCR No.	:	2022.9	Issued by	:	Rizliani Aprianita Hsb
Date Issued	:	18 November 2022	Time Limit	:	Next Assessment
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	3.7.2 Training records are maintained, whenever possible available to each individual.			
Evidence observed (filled by auditor): -					
Non-Conformance Description (filled by auditor): The company has not been able to show the realization of training for all staff, workers, plasma smallholders and outgrowers covering aspects of the RSPO principles and criteria.					
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	:				

NCR No.	:	2022.10	Issued by	:	Rizliani Aprianita Hsb
Date Issued	:	18 November 2022	Time Limit	:	Next Assessment
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	4.2.2 Procedures are in place to ensure the system is understood by affected parties, including those who cannot read or write			
Evidence observed (filled by auditor): Based on the results of interviews with management, it was conveyed that there were no procedures in place to ensure the system was understood by affected parties, including those who could not read or write.					
Non-Conformance Description (filled by auditor): Based on the explanation above, it is concluded that the company does not yet have procedures to ensure that the system is understood by affected parties, including those who cannot read or write.					
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	:				

NCR No.	:	2022.11	Issued by	:	Rizliani Aprianita Hsb
Date Issued	:	18 November 2022	Time Limit	:	Next Assessment
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	4.2.3 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.			
Evidence observed (filled by auditor): <ul style="list-style-type: none"> • The company has a complaint procedure No. SOP-OTH-F3-019 dated 10 January 2019. The SOP explains that all complaints must be recorded • Logbook of complaints at Bangkirai Estate which informs that all complaints have been followed up. • Logbook of Bangkirai Mill complaints informing that all complaints have been followed up. The results of interviews with mill workers revealed that there were several complaints related to housing. However, there is no complaint information in the complaint logbook. • Results of interviews with Jatimas Estate management representatives, obtained information that there were no complaints recorded. The results of interviews with harvest workers at Jatimas Estate revealed several complaints, such as wage cuts and BPJS 					
Non-Conformance Description (filled by auditor): Based on the explanation above, it is concluded that the company has not been able to show evidence that all complaints from stakeholders have been recorded by the company along with information on complaint handling to the parties.					
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	:				

NCR No.	: 2022.12	Issued by	: Rizliani Aprianita Hsb			
Date Issued	: 18 November 2022	Time Limit	: 12 Month (Recommendation 9 Month)			
NC Grade	: Major	Date of Closing	: 20 March 2023			
Standard Ref. & Requirement	6.2.2 Availability of work agreements along with related documents detailing wages and working conditions (for example regular working hours, deductions, overtime, sick leave, right to leave, maternity leave, reasons for dismissal, notification period before dismissal, etc.) national regulatory provisions) and salary breakdown documents that provide accurate information regarding compensation for work performed.					
Evidence observed (filled by auditor): The auditor verifies the evidence in the form of: <ul style="list-style-type: none"> • The results of interviews with plantation workers such as harvester, manuring workers, spraying workers, workshop workers and factory workers obtained information that there were no salary slips / wage documentation given to workers. This is not in accordance with PP No. 36 of 2021 which explains that employers are required to provide proof of payment of wages which contains details of wages received by workers when wages are paid • The results of interviews with daily workers, for example for harvesting, spraying, spraying activities at JMSE, GHRE, BKRE, ASNE, FFB loaders at ASNE and workshop workers at BKRE obtained information that workers have never signed a work agreement with the company 						
Non-Conformance Description (filled by auditor): Based on the explanation above, it is concluded that: <ul style="list-style-type: none"> • There is not enough evidence yet that all workers have work agreements • There is not enough evidence that the company has provided payslips / salary breakdown documentation that provides accurate information regarding compensation for work performed. • The company has not been able to show evidence of payslips/wages documentation for some workers, for example workers with the initials HMS, ZND, MW, KT at JMSE and NS, FR, MJ at GHRE 						
Root Cause Analysis (filled by organization audited): Employee Employment Agreement Letter Employees lack discipline in properly managing the SPK (Employment Agreement Letter) that has been given/signed (often lost or forgotten), but if asked they will say they never had/signed the SPK. Apart from that, the validity period of the Employment Agreement Letter for BHL level workers is 3 months, making it also difficult to document (renewing the SPK).						
Auditee response – 20.03.2023 revision of the root of the problem: The company provides BHL SPKs to workers (we have attached several samples of BHL SPKs) but there are some workers who are missed, for example: if the workers come in large numbers so it takes time to make the SPK, or there are also some workers who forget to have signed the SPK.						
Employee Wage Slip <ol style="list-style-type: none"> 1. The pay slip explains that the harvester has deductions for absences and not reaching base. However, deductions in the payroll system are directly deducted from the wages earned, meaning it will cut the salary payments earned (minimum wage) so that it appears that the company is paying wages below the provisions. 2. Wage payments via bank transfer and details of employee wage components are available in the Plantation Management System (PMS), where data input is carried out by the Central Data Process (CDP) section in each area. Each employee can request data from CDP if they need details of their wages/wage slips. 						

Auditor's response:

Point 3→NC in point 3 is that salary slips / wage documentation for several workers have not been shown to the auditor. To explain the root cause analysis of the NC.

Auditee response – 20 March 2023 :

- Additional point 3 in explanation 3:
- Additional point 3 in the explanation: salary slips are not shown because salary slips are not printed, but employees can ask for salary slips if needed. Companies do not yet fully understand PP No. 36 of 2021 regarding companies being required to provide pay slips to employees. Apart from that, the delay in providing it to the auditor was due to the PIC being late in providing it to the auditor.

Corrections (filled by organization audited):
Employee Employment Agreement Letter

1. Re-collecting the draft SPK for all BHL workers then the process of signing the SPK for both parties.
2. Submit directly the signed SPK with proof of initial list.

Response

For NC SPK→Between root because analysis, improvements and corrective actions (preventive actions) delivered are not appropriate. Root of the problem→lack of discipline in managing the SPK and difficulty in documenting (renewing) the SPK. However, the correction (improvement) submitted is the re-registration of the SPK data to BHL and the submission of the SPK.

Auditee response -20.03.2023 :

The root of the problem has been adjusted with corrections, namely re-registering workers who have not received the SPK, and again calling anyone who forgot to sign it, to be informed again that the worker has signed and for those who want a copy of the SPK because it has been lost, the company is welcome to do so.

Employee Wage Slip

1. The company has provided employee salary slips starting in November 2022. For the names HMS, ZND, MW, KT at JMSE and NS, FR, MJ at GHRE were given salary slips for December 2022 which were given on January 6 2023(Attachment 2022.12_d. Salary slip).
2. Revise pay slips and calculate deductions in the form of fines (if you do not reach targets or do not work), and do not deduct from the basic wages paid. A meeting was held between the Sustainability, Operations, HCCS, Finance and IT Divisions to discuss this and a letter of application to IT to change payroll in the payroll system(Attachment 2022.1_b. MOM-Update Salary Slip and Wage Scale Structure rev.01)

Auditor response:

- To add examples of documentation for providing salary slips for other units (PKS, Trembesi Estate, Bangkirai Estate, Angsana Estate and Kulim Estate).
- The third NC point relates to not being able to show workers' pay slips to auditors with the initials HMS, ZND, MW, KT at JMSE and NS, FR, MJ at GHRE→so that corrections/corrective actions can be made for the third NC point.

Auditee response – 20.03.2023 :

Providing salary slips that have been signed by workers for PKS, Trembesi, Bangkirai, Angsana and Kulim attached. Correction of giving salary slips. (attached to revision v.01 / January 31 2023 (same as correction no. 1)

Corrective Action (filled by organization audited):
Employee SPK

Provide understanding to the HCCS Div that the provision of SPK is a statutory regulation that must be complied with. Furthermore, during the RSPO internal audit, the SPK submission section will be the first section to be examined because it has become an external finding.

Auditor response:

Between root because analysis, improvements and corrective actions (preventive actions) delivered are not appropriate. Root of the problem → lack of discipline in managing the SPK and difficulty in documenting (renewing) the SPK. However, the corrective action conveyed is to provide understanding to the HCCS Division that the provision of SPK is a statutory regulation that must be complied with.

Auditee response – 20.03.2023 :

The root of the problem has been adjusted with corrective action. Management issued an IM regarding the company's obligation to directly provide SPK to BHL employees (**Attachment 2022.12_e. Rules Regarding PHL Employees**).

Employee Wage Slip

1. The determination of the pay slip in the payroll system will become a template for the next pay slip, this will eliminate the root of the existing problem. Internal auditors and the Sustainability Division will ensure that salary payments comply with applicable regulations through subsequent RSPO internal audits.
2. After the detailed pay slip format is approved, the pay slip sheet (can be physical or electronic) will begin to be given to each person every month. HCCS issues an IM regarding how to distribute pay slips or collect them.

Auditor response:

- In order to show preventive corrective action related to the third NC point (related to not being able to show workers' pay slip to auditors with the initials HMS, ZND, MW, KT at JMSE and NS, FR, MJ at GHRE during the audit.

Auditee response – 20.03.2023 :

IM from Regional Controller (Memorandum No. 06/RC-INT/01/2023 dated 25 January 2023 regarding Employee Salary Slips) to all Estate Managers and HCCS managers and socialization of memos for providing salary slips and can be used as corrective action from the company.

Verified by	:	Radytio Puspanjana
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NCR No.	:	2022.13	Issued by	:	Rizliani Aprianita Hsb
Date Issued	:	18 November 2022	Time Limit	:	12 Month (Recommendation 9 Month)
NC Grade	:	Major	Date of Closing	:	10 July 2023
Standard Ref. & Requirement	:	6.2.3 There is evidence of legal compliance for regular working hours, deductions, overtime, sick leave, vacation entitlements, maternity leave, reasons for termination, notice period before termination, and other employment conditions.			
Evidence observed (filled by auditor): The auditor verifies the evidence in the form of: Daycare worker <ul style="list-style-type: none">The results of interviews with workers at the Daycare in Bangkirai Estate obtained information that workers came to work at 5.30 in the morning and only returned to work at 5 or 6 in the afternoon.The results of verification of attendance documents in August and September 2022 show that workers return home on average at 5 o'clockThe results of verification of wage slips for August and September 2022 show that the Daycare workers only receive a basic wage according to the minimum wage Security <ul style="list-style-type: none">The results of verifying the security overtime recap document with employee number 08013 in September 2022, it is known that the security has 3 days off (Off) on the 11th, 18th and 25th. As for holidays in September 2022 it is known that there are 4 days off (4th, 11, 18, and 25) and 26 working daysThe results of verification of pay slips and recap of security overtime note that workers work on off days/schedules (September 7th) but are counted as working days and not counted as working days on holidays Based on the company regulations, it is explained that non-staff employees who work more than 40 working hours in 1 week apply the provisions for working overtime. Non-Conformance Description (filled by auditor): Based on the explanation above, it is known that the company has not been able to show proof of legal compliance, especially the implementation of the overtime work mechanism					
Root Cause Analysis (filled by organization audited): 1. Child Care Place (TPA) Employee Working Hours: The average overtime hours in question are usually calculated from the time the worker is absent. Usually, after returning from the TPA, the person concerned does not immediately leave but goes home first. With the existing average, the company issued IM Premium Calculation No. 36/RC-IMT/11/22 Regarding Premiums for TPA Officer Positions. This premium calculation will begin to be applied to wages in November 2022. 2. Security Employee Overtime Wages: On September 7 2022, security usually works for 1 shift, but because there are activities at mess management, the security is employed again at that location, so this security works in 2 shifts in 1 day, the CDP (Central Data Processing) and the Unit Head as superiors late in coordinating.					
Corrections (filled by organization audited): 1. Child Care Place (TPA) Employee Working Hours: Show Premium Calculation IM No: 36/RC-IMT/11/22 and salary slip for TPA officers for November and December 2022 2. Security Overtime Wages: Pay the September 2022 salary shortfall to Security NIK 08013 and proof of manual provision.					

Auditor response

NC regarding overtime for TPA officers→In the applicable rules/regulations, excess work hours are paid with overtime wages. The company provides premiums to TPA workers. Regarding this matter, has the company carried out a simulation of calculating worker overtime? Is the premium paid not less than overtime wages based on applicable regulations? To show a simulation of the calculation with actual working hours for TPA workers.

Auditee response – 20.03.2023 :

Simulation of calculating overtime with similar types of work / time units attached (Attachment 2022.13. Simulation of Calculating Working Hours for TPA Officers).

The premium paid is less than the calculation of overtime wages. The policy of providing premiums instead of overtime pay was decided based on the consideration that in daily practice 2 TPA officers are on duty in shifts, one of whom can carry out activities at his house (for personal matters) for several hours, where his house is very close to the TPA.

Corrective Action (filled by organization audited):
1. Child Care Place (TPA) Employee Working Hours:

Socialize the IM to the Estate Manager so that non-payment of overtime premiums does not happen again.
Appoint the TPA officer to SKU-H to be able to work more than 21 days each month.

2. Security Overtime Wages:

Improved coordination from the head of the unit to the CDP regarding additional work to security so that it is immediately recorded in the system.

Auditor response

To explain further what kind of improvement in coordination.

Auditee response – 20.03.2023 :

The increase in coordination referred to is more intense communication and quickly conveying changes in members' working days/hours.

Assessor Evaluation and Conclusion (filled by auditor):
Auditor verification dated February 15, 2023

The company shows proof of improvement in the form of:

- Minutes of meeting regarding updates to salary slips and wage scale structure on 26 December 2022
- The wage scale and daily status employee classes are determined on January 2, 2023
- Proof of underpayment for security paid on September 7 2022
- Memorandum No. 36/RC-INT/11/22 dated 1 November 2022 regarding premiums for the position of TPA Officer with a value of Rp. 500,000/month
- TPA officer salary slip for November 2022 which confirms the premium for TPA officers
- SKU Work Agreement for trial period for 2 TPA workers dated January 30 2023 with worker initials JL and MAB

Please respond to the auditor's response.

Based on the explanation above, the nonconformity is declared Not Yet Fulfilled.

Verify July 10, 2023

Based on the results of verification of root cause analysis, corrections and corrective actions, it is known that the company has identified the causes of nonconformities and carried out corrections to nonconformities and corrective actions so that nonconformities do not recur. Based on this, a discrepancy in this indicator is declared **has been fulfilled** and will be observed in subsequent audit activities.

Verified by : **Radytio Puspanjana**

NCR No.	: 2022.14	Issued by	: Rizliani Aprianita Hsb
Date Issued	: 18 November 2022	Time Limit	: Next Assessment
NC Grade	: Minor	Date of Closing	: February 17, 2023
Standard Ref. & Requirement	6.2.7 Permanent workers are employed for all main work performed by the unit of certification. Temporary workers and casual daily workers are limited to temporary or seasonal work		
Evidence observed (filled by auditor): Auditor verification: <ul style="list-style-type: none"> Results of verification of payroll documents for September 2022 which informed the list of workers, positions and status of workers, it was found that there were 992 harvester with daily worker status at PT JMS. Results of interviews with management, obtained information that permanent employment at PT JMS refers to Decree of GAPKI No. SK/002/PPG/II/2013 dated 8 February 2013 concerning the Activity Flow of the Work Implementation Process in the Oil Palm Plantation Business Sector stated that the main activities include harvesting and processing fruit into CPO. The company has shown records of daily worker appointments to SKU (permanent worker) for October 2022, which are explained as follows: <ul style="list-style-type: none"> Decree of appointment of BKRE → with a total of 5 employees appointed Decree of appointment of GHRE → with a total of 3 employees appointed 			
Non-Conformance Description (filled by auditor): There is not yet sufficient evidence that all permanent work is not carried out by Temporary or Casual Daily Workers.			
Root Cause Analysis (filled by organization audited): Many workers from outside the region are not willing to be appointed as PKWTT due to the freedom to return to their respective regions at any time.			
Corrections (filled by organization audited): Develop plans and targets for the appointment of PKWT workers with priorities: <ol style="list-style-type: none"> Main Types of Work Years of service Employee Absence <ul style="list-style-type: none"> Attachment 2022.14_a. Prog & Actual Increase in SKU Panen_JMS_v01 Attachment 2022.14_b. Prog & Actual Non-Harvest SKU Increase_JMS_v01 			
Corrective Action (filled by organization audited): HCCS and Dept. Sustainability will ensure that all employees working in the main types of work have been appointed as permanent employees, the implementation of which will be monitored regularly through RSPO internal audit activities.			
Assessor Evaluation and Conclusion (filled by auditor): Rater Evaluation and Conclusion (completed by the auditor): Verification date February 15, 2023 The company has shown Harvest SKU appointment program document with a total of 773 workers who are in the process of being appointed and 10 workers who have been appointed in January 2023. (to be shown for PT JMS only) In order to be able to respond to the auditor's response. Based on the explanation above, the nonconformity is declared Not Yet Fulfilled.			

Verification date February 17, 2023

The company has shown Documents:

4. Identification, appointment program and realization of appointment for harvest SKU workers totaling 782 people.
From this document, it is known that 56 workers have been appointed as SKUs. The other workers are planned to be appointed in 2023 and the appointment program will be completed in June 2023.

Based on the explanation above, the nonconformity is declared Fulfilled.

Verified by	:	Radytio Puspanjana
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NCR No.	:	2022.15	Issued by	:	Rizliani Aprianita Hsb
Date Issued	:	18 November 2022	Time Limit	:	12 Month (Recommendation 9 Month)
NC Grade	:	Major	Date of Closing	:	February 17, 2023
Standard Ref. & Requirement	:	6.6.1 Workers accept work voluntarily and freely, and the following things are prohibited: <ul style="list-style-type: none">• Retention of identity documents or passports.• Payment of recruitment fees• Substitution of work agreements without labor agreement.• Forced overtime work• Barriers to workers leaving the employment relationship• Imposition of penalties for termination of employment. Unless the company and workers agree on the penalty and stated in the work agreement• Forced work due to debt obligations.• Withholding wages			
Evidence observed (filled by auditor): Auditor verification results: <ul style="list-style-type: none">• The results of interview observations with harvest workers in block Y44 division 3 Bangkirai Estate with the initials ESP, it is known that the workers come from eastern Indonesia and have worked for 2 months. From the results of the interviews, information was obtained that the workers were recruited in the area of workers with AKAD status. However, from the interview results, information was also obtained that the worker's identity card (KTP) had been with the company since entering the company and had not been returned.• Recruitment procedure No. SOP-HC-006 dated 9 February 2021 which explains that administrative documents for prospective workers are in the form of photocopies of ID, NPWP, family cards and others.					
Non-Conformance Description (filled by auditor): There is a withholding of workers' identity documents and there is not yet sufficient evidence that the implementation of the recruitment of workers from outside the area is in accordance with the existing procedures.					
Root Cause Analysis (filled by organization audited): Companies borrow KTPs from new employees to use for tickets, registering bank accounts, permits in local villages, etc. and the rest of the KTPs are given back to the workers. However, not all of them returned because it took time and had not yet been returned. At the time the audit was taking place, there were employees who had run away before 2 weeks of work coming to collect their ID cards, giving the impression that the company was holding the ID cards of new workers.					
Corrections (filled by organization audited): <ul style="list-style-type: none">- Return KTP and proof of return documentation in the name of ESP and several other names for KTPs that have not been taken.- Management issuing lms is not allowed to withhold workers' real identities, KTPs are only borrowed for a maximum of 14 working days for administrative processing.					
<i>Information :</i> <i>Bangkirai Estate harvester case: The employee concerned ran away before the RSPO audit was carried out and returned to Bangkirai Estate to ask for the return of his KTP during the RSPO audit.</i>					
Corrective Action (filled by organization audited): The company will ensure this with regular inspections carried out by the internal audit team. And carry out IM					

outreach to all managers that it is not permissible to borrow KTPs for more than 14 working days.

Assessor Evaluation and Conclusion (completed by the auditor):

Verification date February 14, 2023.

The company shows proof of improvement in the form of:

- Memorandum No. 39/RC-INT/12/2022 dated 1 December 2022 regarding the rules for borrowing identities for employee administration
- Socialization of Memo No. 39/RC-INT/12/2022 regarding the rules for borrowing identities for employee administration which was held on December 2 2022 which was attended by 29 participants consisting of estate managers, assistants and others.
- Documentation of returning workers' KTPs with the initials ESP on November 19 2022.

Auditor response

- Has the company identified the number of workers whose ID/KTPs have not been collected (according to the correction column submitted?) and when will these employees be handed over/returned KTPs?

In order to be able to respond to the auditor's response which is highlighted in yellow.

Based on the explanation above, the nonconformity is declared Not Yet Fulfilled.

Auditee response – 20 March 2023 :

List of names of employees whose KTPs have been returned, along with recipients' signatures on 18 and 21 December 2022, all KTPs have been returned to workers. (Attachment 2022.15. BA Returning KTPs (All Employees))

Verification date February 17, 2023

The company shows proof of improvement in the form of:

- Minutes of return of KTP for recruited employees No. 288/HCCS-INT/JMS/XI/2022 dated 18 November 2022 to 72 workers.
- Minutes of return of KTP for recruited employees No. 453/HCCS-INT/JMS/XII/2022 dated 21 December 2022 to 26 workers.

Based on the explanation above, the nonconformity is declared Fulfilled.

Verified by : **Radytio Puspanjana**

<i>NCR No.</i>	:	2022.16	<i>Issued by</i>	:	Radytio Puspanjana
<i>Date Issued</i>	:	18 November 2022	<i>Time Limit</i>	:	12 Month (Recommendation 9 Month)
<i>NC Grade</i>	:	Major	<i>Date of Closing</i>	:	June 25, 2023
<i>Standard Ref. & Requirement</i>	:	6.7.3 Workers use appropriate Personal Protective Equipment (PPE), which is provided free of charge to all workers at the workplace, as protection in all potentially hazardous operations, such as pesticide application, machine operation, land preparation and harvesting. Sanitation facilities are available for workers who use pesticides so that workers can remove PPE, clean themselves and put on their personal clothes.			
Evidence observed (filled by auditor): <ul style="list-style-type: none">The Eagle High Plantations Sustainability Policy explains that the person in charge appointed by the company has the role of overseeing all matters related to safety and health, including the provision of suitable and sufficient protective equipment.Regarding to sanitation activities in the rinse room, the company already has rinse room facilities for workers but does not yet have a mechanism/system related to washing in the rinse room.Results of Field Observations and Interviews:<ul style="list-style-type: none">Bangkirai Estate<ul style="list-style-type: none">Harvesters in Block Y44 Division 3 use boots that come from private purchases and do not use glasses as stated in the Hazard Identification and OHS Risk Assessment. The PPE provided was only in the form of a helmet.Sprayer in Block W42 Division 2 use boots that come from personal purchases, use non-respirator masks and do not use goggles as stated in the Hazard Identification and K3 Risk Assessment. The PPE provided includes helmets, gloves, masks (non-respirators) and aprons.Workshop workers use safety shoes that come from personal purchases because the PPE provided is boots.Angsana Estate<ul style="list-style-type: none">Harvesters in Block T51 Division 2 use boots that come from private purchases and do not use glasses as stated in the Hazard Identification and OHS Risk Assessment. The PPE provided was only in the form of a helmet.Sprayer in Block T51 Division 2 use boots that come from personal purchases, use non-respirator masks and do not use goggles as stated in the Hazard Identification and K3 Risk Assessment. The PPE provided includes helmets, gloves, masks (non-respirators) and aprons.Fertilizer employees in Block T51 Division 2 use boots that come from personal purchases. The PPE provided was in the form of helmets, rubber gloves, masks (Health) and aprons while boots were not provided by the company. The masks used are not in accordance with the Hazard Identification and Risk Assessment documentsBased on the results of interviews with the management unit, it is known that there are 10 spray employees at Angsana Estate, but there are 5 workers currently working in the field. Based on the observation results, there was no PPE for 5 workers who were not on duty and there were no clean clothes stored for workers in the field. In line with this matter, based on interviews with spray workers it is known that workers go straight to the workers' homes and bring PPE back home.Jati Mas Estate<ul style="list-style-type: none">Harvesters in Block M58 Division 1 use boots that come from private purchases. The PPE provided is in the form of helmets and goggles.Spray employees in Block L57 Division 1 use boots that come from personal purchases and use non-respirator masks (not in accordance with the Hazard Identification and K3 Risk Assessment). The PPE provided includes helmets, gloves, masks (non-respirators), goggles and aprons.Fertilizer employees in Block J75 Division 3 use boots that come from personal purchases because					

the PPE provided is in the form of helmets, rubber gloves and aprons while the boots are not provided by the company.

- **Gaharu Estate**

- Harvesters in Block 76 Division 1 use boots that come from private purchases and do not use glasses as stated in the OHS Hazard Identification and Risk Assessment.
- Fertilizer employees in Block D77 Division 1 have been given PPE in the form of helmets, rubber gloves, masks and aprons. However, there are no glasses for fertilizer workers according to the results of the risk identification they have.

Non-Conformance Description (filled by auditor):

The company has not been able to show enough evidence that workers use Personal Protective Equipment (PPE) that is in accordance with the results of the OHS Hazard Identification and Risk Assessment provided by the company as well as the implementation of the washing mechanism in the rinse room.

Root Cause Analysis (filled by organization audited):

- PPE is still not managed well, Sustainability is responsible for distribution but the budget holder is in the Operations Division. So requests for PPE must have approval from operations. Suboptimal PPE arrangements are also caused by the absence of clear internal regulations regarding PPE.
- Implementation of PPE is still being taken home because new workers have not received socialization and old ones are still reluctant to return it due to lack of supervision from Division Managers and Assistants.

Corrections (filled by organization audited):

1. Procuring Area 1 according to PPE that is not owned, Distributing PPE in area 1 and area 2.
2. Conduct outreach and ask managers to understand that PPE must be provided quickly, and it is prohibited to take PPE home, especially those used for spraying activities.

Auditor's note dated February 9, 2023.

There are still points that need to be followed up and explained in detail in the assessor's evaluation section.

Auditee response – March 20, 2023:

Add additional proof of corrective action documents:

1. Identify PPE needs for semester 2 of 2023 for the East Kalimantan area. (**Attachment 2022.16_a. Identifying East Kalimantan's PPE Needs**)
2. Procure Area 1 according to PPE that is not owned. (**Attachment 2022.16_b. Procurement of PPE Area 1**)
3. Distribute PPE in area 1 and area 2. (**Attachment 2022.16_c. BA Handover of APD Jatimas Estate & Trembesi Estate**)

Corrective Action (filled by organization audited):

The company establishes a PPE SOP which regulates the provision of PPE, replacement and PPE required for each job. Apart from that, PPE inspections will be carried out by the Sustainability Assistant every month.

Rater Evaluation and Conclusion (completed by the auditor):

Auditor response dated February 9, 2023

The company can present documents:

1. SOP-OTH-F3-023 concerning Personal Protective Equipment which was signed by the CFO & CEO on December 15 2022. This procedure explains the obligations of management or workplace leaders to provide personal protective equipment. Furthermore, the types of PPE are also explained, including the time limit for use and the mechanism for replacing PPE.
2. Recapitulation of PPE procurement for Gaharu Estate, Angsana Estate, Bangkirai Estate and Kulim Estate units. The company procured PPE in the form of helmets, ear muffs, aprons, boots, glasses, gloves and egret covers.
3. Minutes of the handover of PPE on November 17 2022.

4. IKA-OTH-F3-04-05 concerning Spray Rinse Houses which was signed by the Head of Sustainability on February 1 2023. This document explains the management of spray rinse houses including the mechanism for their use which includes the prohibition on taking them home and the obligation to wash equipment. Work, PPE, chemicals (pesticides).
5. News of the socialization event IKA-OTH-F3-04-05 regarding Spray Rinse House which was held on January 27 2023 and attended by 22 participants.

Based on the verification results of corrective actions, there are several points of concern including:

- Recap the procurement of PPE (for example boots) according to needs based on the number of workers listed. GHRE Units: **390 pairs**, on the other hand, the number of workers per period October 2022 is a number **437 workers**. ASNE Units: **296 pairs**, on the other hand, the number of workers per period October 2022 is a number **466 workers**. BKRE Units: **350 pairs**, on the other hand, the number of workers per period October 2022 is a number **495 workers**. KLIE Units: **253 pairs**, on the other hand, the number of workers per period October 2022 is a number **272 workers**. CNDE Units: **12 pairs**, on the other hand, the number of workers per period October 2022 is a number **366 workers**. **There is still a gap in the need for PPE boots related to the procurement of goods and the number of workers.**
- The company has not been able to provide a procurement recap for Jatimas Estate and Trembesi Estate.
- Information on the PPE handover minutes does not include specific locations for each Estate unit.

Based on the results of verification of root cause analysis and corrective action, it is known that the company has identified the causes of nonconformities and corrective actions so that nonconformities do not recur, but has not been able to correct the nonconformity as a whole. Based on this, a discrepancy in this indicator is declared **unfulfilled**.

Auditor verification dated June 25, 2023

The company can present documents:

- Identify PPE needs semester 2 of 2023 for the East Kalimantan area unit which was signed by the Head of Certification and Compliance on February 17 2023.
- Proof of handover of PPE to 378 workers in the Jatimas Estate unit on January 18 2023 and January 25 2023 to 71 workers in the Jatimas Estate unit.

Furthermore, related to the gap between the handover of PPE and the number of workers based on clarification by the management unit, some other workers were still using PPE in proper condition.

Based on the results of verification of root cause analysis, corrections and corrective actions, the discrepancy in this indicator is declared **has been fulfilled** and will be observed in subsequent audit activities.

Verified by	:	Radytio Puspanjanna
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NCR No.	: 2022.17	Issued by	: Radytio Puspanjana
Date Issued	: 18 November 2022	Time Limit	: Next Assessment
NC Grade	: Minor	Date of Closing	: 02 March 2023
Standard Ref. & Requirement	: 6.7.4 All workers are provided with health services and are protected by occupational accident insurance. Expenses arising from work incidents, resulting in injury or illness, are borne in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.		
Evidence observed (filled by auditor):			
<ul style="list-style-type: none">PT JMS Company Regulations for the 2018-2020 period, Article 18 concerning Health Care Insurance paragraph 1 explains that the Company includes employees and their families as members of Health Social Security referring to RI Law No. 24 of 2011 concerning BPJS Health and its implementing regulations.Companies can show documents for the number of employees for the October 2022 period, including:<ul style="list-style-type: none">Bangkirai Mill: 124 workers.Angsana Estate: 466 workers.Bangkirai Estate: 495 workers.Gaharu Estate: 437 workers.Jatimas Estate: 484 workers.Kulim Estate: 272 workers.Trembesi Estate: 283 workers.Companies can show billing statements for payment of BPJS Health Insurance PT JMS for the October 2022 period for a total of 675 workers with a total of 1,362 dependents.Companies can show PT JMS Employment BPJS payments for the September period, including:<ul style="list-style-type: none">Billing statements for the Bangkirai Mill unit totaling 116 workers.Billing statements for the Angsana Estate unit totaling 188 workers.Billing statements for the Bangkirai Estate unit totaling 208 workers.Billing statements for the Gaharu Estate unit totaling 229 workers.Billing statements for the Jatimas Estate unit totaling 224 workers.Billing statements for the Kulim Estate unit totaling 133 workers.Billing statement for the Trembesi Estate unit totaling 114 workers.The company has provided a folder containing information on proof of payment for BPJS Health and BPJS Employment Insurance ahead of the closing audit activity, but the file provided cannot be opened by the auditor.Based on the results of field observations and interviews at Bangkirai Estate, Angsana Estate, Jati Mas Estate and Gaharu Estate, it is known that there are workers who have not received BPJS Health and Employment Insurance facilities.			
Non-Conformance Description (filled by auditor):			
The company has not been able to show enough evidence that all workers have received BPJS Health and BPJS Employment Insurance facilities.			
Root Cause Analysis (filled by organization audited):			
BPJS TK and KS registration for employees, especially casual daily workers, is delayed due to several factors:			
1. Cost impact of the company.			
2. Employees who have been programmed/proposed have left their jobs, and there are other problems.			
Correction (filled by organization audited):			
<ul style="list-style-type: none">Create a measurable program for BPJS TK and KS registration for all 100 workers per month and show proof of realization as of January 2023.			

- Proof of membership in the BPJS Employment Estate unit for the period January 2023 for 1,706 workers.

Proof of BPJS Employment membership for the period March 2023 for 1,008 workers and 1,450 dependents.

Corrective Action (filled by organization audited):

Management is committed to continuing to comply with applicable laws and regulations including participation and payment of BPJS. The Sustainability Division will continue to remind the HCCS Division regarding the company's efforts to fulfill its obligations to continue to monitor the program / register and remind of the obligation to pay BPJS contributions.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor verification dated February 9, 2023

The company can present documents:

- Monitoring BPJS Health registration which includes the registration plan for 1,845 workers during the period January – October 2023 and its realization in excel format.
- Monitoring BPJS Employment registration for SKU and BHL-Pro workers in excel format.
- Screenshot of proof of online BPJS Health membership registration.
- Proof of BPJS Employment participant cards for the Gaharu Estate unit for 39 workers.

Based on the results of verification of root cause analysis and corrective actions, it is known that the company has identified the causes of nonconformities and corrective actions so that nonconformities do not recur, but has not been able to correct the nonconformities. Based on this, a discrepancy in this indicator is declared **unfulfilled**.

Auditor verification dated February 17, 2023

Companies can show documents for the BPJS employee registration program for the period February – October 2023 for a number of employees 1730 workers in the JMSE, TRBE, GHRE, ASNE, KLIE and BKRE units, which was approved by RC Kaltim on January 2 2023. On the other hand, companies also need to ensure technically who will bear the responsibility if a work accident occurs during the progress of achieving the BPJS program as a whole.

Based on the results of verification of root cause analysis and corrective actions, it is known that the company has identified the causes of nonconformities and corrective actions so that nonconformities do not recur, but has not been able to correct the nonconformities. Based on this, a discrepancy in this indicator is declared **unfulfilled**.

Auditee Response:

If a work accident occurs, all employees who have not registered with BPJS remain the responsibility of the company as stated in the Company Regulations in article 22 Personal Accident Insurance: The company insures each employee against the risk of a work accident occurring to him.

Auditee Response: (26 February 2023)

Management is committed to registering all its employees in the BPJS Employment and Health program along with payment. BPJS TK was registered today, and BPJS Health can only be registered on the 1st.

Auditor verification dated February 28, 2023

The company can present documents:

BPJS of Employment

1. Details of workers who received BPJS Employment facilities (JKK and JKM) for the Trembesi Estate unit as evidenced by the January 2023 contribution billing statement for a total of 141 participants.
2. Details of workers who received BPJS Employment facilities (JKK and JKM) for the Kulim Estate unit as evidenced by the January 2023 contribution billing statement for a total of 285 participants.
3. Details of workers who received BPJS Employment facilities (JKK and JKM) for the Bangkirai Estate unit as evidenced by the January 2023 contribution billing statement for a total of 345 participants.
4. Details of workers who received BPJS Employment facilities (JKK and JKM) for the Gaharu Estate unit as evidenced by the January 2023 contribution billing statement for a total of 344 participants.
5. Details of workers who received BPJS Employment facilities (JKK and JKM) for the Jatimas Estate unit as evidenced by the January 2023 contribution billing statement for a total of 294 participants.

6. Details of workers who received BPJS Employment facilities (JKK and JKM) for the Angsana Estate unit as evidenced by the January 2023 contribution billing statement for a total of 296 participants.

Based on the verification results, it is known that the company has registered workers in the BPJS Employment program.

BPJS Health

- BPJS Health registration document for the Kulim Estate unit for the period March 2023 signed by the Head of HCCS with the number of workers to be registered being 66 workers.
- BPJS Health registration document for the Trembesi Estate unit for the period March 2023 signed by the Head of HCCS with the number of workers to be registered being 81 workers.
- BPJS Health registration document for the Gaharu Estate unit for the period March 2023 signed by the Head of HCCS with the number of workers to be registered being 456 workers.
- The BPJS Health registration document for the Jatimas Estate unit for the period March 2023 signed by the Head of HCCS with the number of workers to be registered is 188 workers.
- BPJS Health registration document for the Angsana Estate unit for the period March 2023 signed by the Head of HCCS with the number of workers to be registered being 303 workers.
- BPJS Health registration document for the Bangkirai Mill unit for the period March 2023 signed by the Head of HCCS with the number of workers to be registered being 9 workers.

Based on the verification results, it is known that the management unit has been able to show evidence of improvements to BPJS Employment membership registration, regarding proof of payment which will be verified in the next audit activity. On the other hand, the company has not been able to show proof of BPJS Health registration.

From the explanation above, proof of correction is still needed referring to the verification results, and the company needs to readjust the correction explanation according to the proof of improvement shown. Therefore, nonconformity in this indicator is stated **unfulfilled**.

Auditor verification dated March 2, 2023

Companies can show proof of BPJS Health membership registration for workers along with BPJS Health billing statements for the period March 2023 for a total of 1,008 workers and 1,450 dependents.

Based on the verification results, it is known that the company can demonstrate membership in BPJS Employment and Health. Regarding proof of payment, it will be verified in the next audit activity. Therefore, non conformity in this indicator is stated **fulfilled** and will be observed in subsequent audit activities.

Verified by	:	Radytio Puspanjana
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NCR No.	: 2022.18	Issued by	: Radytio Puspanjana
Date Issued	: 18 November 2022	Time Limit	: Next Assessment
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 7.3.2 There is evidence of waste disposal according to procedures fully understood by workers and managers		
Evidence observed (filled by auditor): Domestic waste - OTH-F3-04-03: Management and monitoring of solid domestic waste which explains that the transport of domestic waste is carried out 2 times a week to the final landfill, it is not justified to dispose of waste in any place and do not incinerate waste. Based on the results of field visits in several locations, for example: <ul style="list-style-type: none"> • Domestic waste at the security post at the Bangkirai Estate guest houses is disposed of and burned around the post. • Domestic waste is disposed of in a residential area at Bangkirai Estate. • There are traces of burning garbage next to the employees' housing in Jatimas Estate. • There are traces of burning garbage next to the employees' housing at Angsana Estate. Hazardous waste - IK-OTH-F3-04-01: Management and monitoring of Hazardous waste explains that Hazardous waste Used batteries, used oil, used folter, used rags, used TL lamps are stored in TPS for Hazardous waste and then transported by transporters licensed by the government. Management of B3 contaminated packaging, used pesticide chemical packaging and used PKS water chemical packaging, namely washing 3 times in a special washing place. Based on the results of field visits in several locations, for example: <ul style="list-style-type: none"> • Discarded used fertilizer sacks (inner) next to the fertilizer warehouse at Angsana Estate. • Several types of Hazardous waste, for example, used oil drums, used oil, used batteries, used grease buckets in the former Angsana Estate workshop area. • Used packaging of Kleenup and Gramoxone pesticides in the civil engineering (CE) work area at Angana Estate. • Utilization of used PKS chemical packaging as a place for equipment for the Bangkirai IPAL WWTP operator. • 6 PCS of used oil packaging (drums) at the Jatimas Estate oil warehouse Non-Conformance Description (filled by auditor): The company has not been able to show sufficient evidence that the management of Hazardous waste and domestic solid waste is in accordance with procedures and is fully understood by all workers and managers.			
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	:		

NCR No.	: 2022.19	Issued by	: Radytio Puspanjana
Date Issued	: 18 November 2022	Time Limit	: Next Assessment
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 7.7.2 Peat areas within managed areas are inventoried, documented and reported to the RSPO Secretariat (effective from 15 November 2018).		
Evidence observed (filled by auditor): <ul style="list-style-type: none"> Results of interviews with representatives of the management unit revealed that the basis for determining reporting of peat inventory to the RSPO refers to the Soil and Land Suitability Map of PT Jaya Mandiri Sukses. Companies can show proof of peat inventory reporting to RSPO via email on March 12, 2020. The area of planted peat is 4,346 Ha, the peat rehabilitation area is 1,085 Ha and other areas are 32 Ha, so the total reported peat area is 5,463 Ha. Based on the verification results of PT Jaya Mandiri Sukses's Land and Land Suitability Map documents, scale 1: 120,000 for the period March 2012, it is known that the total peat area of PT Jaya Mandiri Sukses is 5,403.64 with details of peat depth <1.5 m covering an area of 238.38 Ha, peat depth of 1.5 – 3 m covering an area of 1,714.76 Ha and peat depth > 3 m covering an area of 3,450.50 Ha. 			
Non-Conformance Description (filled by auditor): The company has not been able to show that the peat inventory reported to the RSPO is in accordance with PT Jaya Mandiri Sukses's Soil and Land Suitability Map scale 1: 120,000 for the period March 2012.			
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):			
Follow up on next audit (filled by auditor):			
Verified by	:		

NCR No.	: 2022.20	Issued by	: Radytio Puspanjana
Date Issued	: 18 November 2022	Time Limit	: 12 Month (Recommendation 9 Month)
NC Grade	: Major	Date of Closing	: February 7, 2023
Standard Ref. & Requirement	: 7.7.4 Evidence of implementation of water and land cover management programs is available.		
Evidence observed (filled by auditor): <ul style="list-style-type: none"> SOP-OTH-F3-014 concerning Management and Monitoring of Peatlands effective January 10 2019 at point 3.2 concerning Arrangements for Drainage and Water Management, specifically at point 3.2.3 it is explained that a high water level can be maintained at a position of 40 cm (forty centimeters) up to 50 cm (fifty centimeters) from the ground surface. The procedure explains that management must ensure that there are sufficient dams, drempe, drainage blocks and 126enstrual in each canal as needed and the high water level can be maintained at a position of 40 cm to 50 cm calculated from the ground surface. Based on the results of a review of piezometer monitoring documents for the period January – October 2022 at Gaharu Estate, it is known that the piezometers in blocks E62 and F62 have an average water level that is maintained respectively of 103 cm and 93 cm. Based on the results of field observations and interviews with the management unit, it is known that the company does not yet have a water gate. Currently what is installed in the field is a stop block/bund to regulate water management. 			
Non-Conformance Description (filled by auditor): Unit management cannot demonstrate the implementation of peat management in accordance with procedures and/or applicable regulations.			
Root Cause Analysis(filled by organization audited): <ol style="list-style-type: none"> The piezometer has been installed since 2014, but until now no joint check has been carried out regarding whether the piezometer was installed correctly or not. The stopblock used to regulate water management does not function optimally because it is damaged, so a 126enstrual is needed. 			
Corrections(filled by organization audited): <ul style="list-style-type: none"> The company has just carried out a drainability study by a consultant, PIC has asked a lot of questions about proper piezometer monitoring. After checking together, it was found that the piezometer was damaged, so the company repaired the condition of the piezometer and installed it correctly. Improve the condition of the stopblock so that it can function properly while waiting for the 126enstrual construction proposal. 			
Corrective Action(filled by organization audited): PIC will add references regarding water management by asking lots of questions to partners or will include training related to water management in peat management. The company will also plan the construction of the water gate according to the SOP.			
Assessor Evaluation and Conclusion(filled by auditor): Auditor response dated February 7, 2023 The company can present documents: <ol style="list-style-type: none"> Minutes of Repair of WMS and Peat Area Management Equipment, No: 007/034/BA/11/2022 dated 18 November 2022. This document explains the repair of piezometer equipment, water level and drain blocks in Block E0062 GHRE. The water level was recorded to have improved with the water level maintained at 50 cm from the previous level of 90 cm. 			

2. The 2023 Stop Block and Water Gate Construction Program has received approval from the East Kalimantan Regional Controller. The document explains 8 points of activity during the 2023 period starting from the identification stage of making stop blocks and water gates to monitoring water levels.
3. WMS 2023 Location Plan Map which explains the peat management monitoring units, such as 11 piezometers, 17 units of subsidence stakes and 70 units of stop blocks.

Based on the results of verification of root cause analysis, corrections and corrective actions, it is known that the company has identified the causes of nonconformities and carried out corrections to nonconformities and corrective actions so that nonconformities do not recur. Based on this, a discrepancy in this indicator is declared **has been fulfilled** and will be observed in subsequent audit activities.

Verified by : Radityo Puspanjana

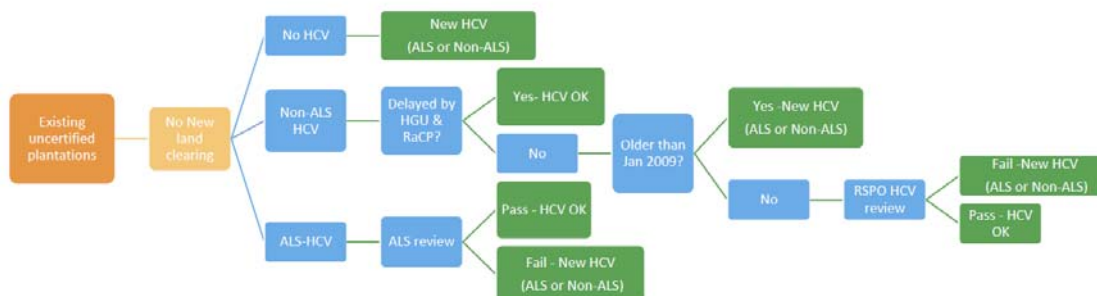
NCR No.	: 2022.21	Issued by	: Radityo Puspanjana
Date Issued	: 18 November 2022	Time Limit	: 12 Month (Recommendation 9 Month)
NC Grade	: Major	Date of Closing	: July 11, 2023
Standard Ref. & Requirement	<p>7.12.2 HCV and HCS forests, and other conservation areas are identified as follows:</p> <ol style="list-style-type: none"> a. For existing plantations that have carried out an HCV assessment by an RSPO approved assessor and have not cleared any new land after 15 November 2018, the existing HCV assessment is still valid. b. New land clearing (on existing plantations or new plantings) after 15 November 2018 was preceded by an HCV-HCS assessment using the latest HCSA Toolkit and HCV-HCSA Assessment Manual in effect at the time of the assessment. This includes stakeholder consultation and considering the wider landscape. 		

Evidence observed (filled by auditor):

Based on the results of the Document Review it is known that:

- The management unit has carried out an HCV assessment carried out by an RSPO approved assessor in 2012.
- In accordance with the explanation in **the Interpretation of Indicator 7.12.2 and Annex 5 for the RSPO Principles and Criteria**, the old HCV for existing plantations can be used with the following conditions:

4.2 Existing Uncertified Plantations (No New Land Clearing)



- The company has communicated with the RSPO regarding the approval of the HCV documents namely:
 - Submission of HCV documents for review by RSPO on 31 May 2022.
 - From 30 August 2022 to 15 November 2022 the company has asked the RSPO regarding the results of the HCV document review, but there has been no response from the RSPO.

Non-Conformance Description (filled by auditor): The management unit has not been able to provide evidence, the HCV documents in possession have received RSPO approval in accordance with the Interpretation of Indicator 7.12.2 and Annex 5 for the RSPO Principles and Criteria .	
Root Cause Analysis (filled by organization audited): The PT JMS HCV Assessment document is still in the process of being reviewed for approval by the RSPO panel.	
Corrections (filled by organization audited): The PT JMS HCV Assessment document received RSPO approval on June 20 2023(Attachment 2022.21. RSPO Approval_PT JMS HCV Assessment Report).	
Corrective Action (filled by organization audited): The company will ensure that it follows RSPO procedures regarding HCV provisions, the implementation of which will be monitored periodically through RSPO internal audit activities.	
Assessor Evaluation and Conclusion (filled by auditor): Verify July 11, 2023 Proof of improvement can be shown in the form of an email from RSPO via No Deforestation (NDTF) nodeforestation@rspo.org on June 20, 2023 which explains that the HCV Report of PT JMS has addressed all the comments therefore we (RSPO) delighted to inform you (PT JMS / eagle high plantations) that the HCV report is deemed satisfactory and thus the HCV review process is completed. Based on the proof of correction sent, the discrepancy in this indicator is declared to have been fulfilled	
Verified by	: Radityo Puspanjana

NCR No.	: 2022.22	Issued by	: Radityo Puspanjana
Date Issued	: 18 November 2022	Time Limit	: 12 Month (Recommendation 9 Month)
NC Grade	: Major	Date of Closing	: June 25, 2023
Standard Ref. & Requirement	: 7.12.4 HCV and HCS forest after 15 November 2018, identified, protected and/or enhanced peatlands and other conservation areas. Integrated management plans to protect and/or enhance HCVs and HCS forests, peatlands and other conservation areas are developed, implemented and adapted where necessary, and complemented by monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and covers areas that are directly managed and takes into account the relevant wider landscape level (if such landscapes have been identified).		
Evidence observed (filled by auditor): <ul style="list-style-type: none">- Regarding the HCV area management and protection plan, it is stated in several documents, namely PT JMS' 2012 HCV assessment recommendations explaining the HCV management plan, namely the establishment of a protected area area for a 50 meter wide reservoir and the installation of HCV signboards such as prohibiting activities such as hunting, burning, cutting trees and use chemicals especially in those areas. As explained in PT JMS' 2012 HCV assessment, the PKS reservoir is an HCV area of 3.49 Ha.- However, based on the results of field visits in the PKS reservoir riparian conservation area, information was obtained that there were no HCV area boundaries on the reservoir's riparian, that the application of chemical pesticides was also found in that area.- The company has shown an HCV management and monitoring plan for the 2022-2027 period, but the company has not been able to show proof of the implementation of HCV management and monitoring documents for the 2022 period.			
Non-Conformance Description (filled by auditor): <p>The company has not been able to show evidence of the implementation of the HCV management and monitoring plan in accordance with the HCV Management plan it has.</p>			
Root Cause Analysis (filled by organization audited): <ol style="list-style-type: none">1. The HCV signboard is located at the entrance to the reservoir area, because it is a restricted area, there is a no entry sign so it is far from the sight of the sprayers because they are entering from the Estate and right next to it are plants belonging to the Bangkirai Estate so the officers immediately took the initiative to spray around the reservoir.2. The management & monitoring realization report for 2022 has not yet been prepared because when the program was started, semester 2 – 2022 had not yet expired (still waiting for the end of December 2022).			
Corrections (filled by organization audited): <ol style="list-style-type: none">1. Providing spray limit signs and conducting outreach to Bangkirai Estate spray employees.2. Attach the HCV management report for semester 2 – 2022 and receipt of reporting to BKSDA.			
Corrective Action (filled by organization audited): <ol style="list-style-type: none">1. Create an inspection list for checking the reservoir, and carry out periodic inspections by the sustainability assistant2. PT JMS Sustainability Staff will ensure that HCV management and monitoring implementation activities are properly documented every month in accordance with the plans that have been made.			
Assessor Evaluation and Conclusion(filled by auditor): Rater Evaluation and Conclusion (completed by the auditor): Auditor verification on February 10, 2023 The company shows proof of improvement in the form of:			

- Minutes of BKRM block U0040 lake-reservoir boundary marking on November 16 2022. → **Please explain how wide the buffer zone is for the reservoir and how many oil palm trees are marked.**
- Minutes of Socialization of Reservoir Area Spray Limits on December 15 2022 to the spray team at BKRE. Also attached are the minutes.
- Photo Sign board prohibits the application of chemicals, throwing rubbish, swimming and playing for children around the reservoir.
- PT JMS HCV Management and Monitoring Report for the 2022 period.
- Receipt of document cover letter to BKSDA PT JMS HCV Management and Monitoring Report for the period 2022 dated 24 January 2023.
- FRM-OTH-F3-05-06 Reservoir-Lake Area Inspection.

In section **Corrective action** The certification unit explains that in maintaining the buffer zone it will fill out a form FRM-OTH-F3-05-06 Reservoir-Lake Area Inspection every month. → **Please prove the implementation.**

So it is concluded that this NCR has not been fulfilled.

Verify June 25, 2023

The company shows proof of improvement in the form of:

Reservoir/lake area inspection document dated February 14 2023 which explains the inspection of reservoir/lake borders. The types of inspections carried out include: availability of signboards, buffer zone limit of 50 meters, no application of chemicals / dead vegetation, no hunting and fires.

Based on this, a discrepancy in this indicator is declared **has been fulfilled** and will be observed in subsequent audit activities.

Verified by	:	Radytio Puspanjana
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3.4.2. Opportunity for Improvement

No	Ref. Std.	Description
1	2.3.2	The company has the opportunity to complete geolocation coordinates, proof of land ownership status from the grower/farmer and legal trade permits from indirect FFB suppliers
2	3.6.1	The company has documents on Hazard Identification and Occupational Safety and Health Risk Assessment, dated January 14, 2022. Based on the results of the document verification, it is known that it still does not accommodate potential exposure to chemicals for workers loading/retailing fertilizer, fire patrols and monitoring of HGU stakes. The company has the opportunity to improve the K3 Hazard Identification and Risk Assessment documents for all work units.

3.4.3. Noteworthy Positive Components

No	Ref. Std.	Description
1		Certified Indonesian Sustainable Palm Oil
2		Commitment to apply the principles of sustainable palm oil management.


3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Plantation Agency of Kutai Kartanegara Regency <ul style="list-style-type: none"> The company already has a plantation business license and there have been no changes/revisions to the business license. There have been no land fires in the last 12 months. The fire fighting facilities and infrastructure are considered sufficient for the needs of the plantation. The Agency has been invited to conduct a simulation on handling land fires. PT JMS have fulfilled their obligation to develop community gardens covering 20% of the cultivated area. There were no complaints or complaints from the public regarding the company's operational activities. 	<p>There is no negative issued need further clarification</p>
Manpower Agency of Kutai Kartanegara Regency <ul style="list-style-type: none"> There are employees who retire early due to illness and the company has made an agreement with the employees to pay the employee's rights no later than October 2022. There are 3 unions at PT JMS and STP and these unions have been registered with the agency. The company has Company Regulation. There are BPJS contributions that have not been paid by the company. There are no reports of work accidents that have occurred in the company. There is a record of contract worker The company refers to the Minimum Wage of Kutai Kartanegara Regency as the basis for determining the basic wage. 	<p>Auditor has verified the issue from agency</p>
Land National Office of Kutai Kartanegara Regency <ul style="list-style-type: none"> Company already has land rights (HGU) and the rights is still valid. There is no change or revision about the scope of rights. There is no complain about land conflict. There might overlapping area with mining land. Company already submit the land use report. 	<p>Auditor has verified the issue from agency. Company can show an agreement between PT JMS and PT Surya Cipta Mahakam which is engaged in coal mining with agreement number 001/KNPPLB/SCM-JMS/XI/2022 issued on November 2, 2022. The letter informs that PT JMS will give permission to use a portion of small area to be utilized and managed by PT SCM. This agreement is valid until March 31, 2023.</p>
Independent FFB supplier CV Regar <ul style="list-style-type: none"> Have been working with PT JMS for approximately 10 years. CV Regar is a FFB collector/agent. The company has identified the land owner's geolocation and land ownership documents for farmers. The FFB price refers to the price set by the factory. 	<p>There is no negative issued need further clarification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> There were no complaints regarding the payment of FFB. 	
Representative of Perian, Lebak Mantan, and Muara Leka Village <ul style="list-style-type: none"> The company has had many positive impacts on Perian village, for example improving the community's economy. There are indigenous peoples and local wisdom in Perian Village. The company has provided assistance to empower indigenous peoples and preserve this local wisdom. There are no issues related to land disputes or environmental pollution. There is no land compensation with the village community. Communities enter into partnerships as land compensation. The company has provided CSR assistance to village communities according to the proposals requested. The company has socialized about conservation areas and protected animals. 	<p>There is no negative issued need further clarification.</p>
Previous Land Owner <ul style="list-style-type: none"> Land handover is conducted through FPIC process. Land owner is member of scheme smallholder. There is no land conflict issue. 	<p>There is no negative issued need further clarification.</p>
Serbundo <p>There are several employment issues, including the following.</p> <ul style="list-style-type: none"> There are work days deduction that are not paid for 3 days in October for harvest workers. This resulted in employees going on strike on the second day of the audit. Employees do not get payslips. The company deducts BPJS contributions every month, but these contributions are not paid to BPJS. There are BHL in every type of work. The BHL works 21 days for 3 consecutive months but the employee's status does not change to PKWTT. BHL does not get BPJS. There is no difference in wages between SKU Daily and BHL employees. Employees have just received PPE, so far they have not received PPE from the company. There was a work accident for the Jatimas Estate Division 1 harvester. There is an employee who is chronically ill at Jatimas Estate, but is not paid a salary and there has been no termination of employment. There are questions from harvesters regarding the 	<p>There is no negative issued need further clarification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
determination of the basis, whether the basis is calculated from the harvested fruit to the TPH or based on the tonnage brought to the OPM.	
Keham Lestari smallholder cooperative <ul style="list-style-type: none"> The total area of the smallholder is ±800 Ha with 1,007 farmer members. The price of FFB refers to the price of the East Kalimantan Provincial Plantation Agency. The operational activity of smallholder is managed by company. There is no complaint about late payment. The company is transparent with smallholder operational activity, for example about the deduction and income of smallholder. 	There is no negative issued need further clarification.
Gender committee <ul style="list-style-type: none"> Company already provide worker with monthly leave, 134enstrual leave, and maternitiy leave especially for woman worker. There is no issue or complaint about discrimination towards woman worker. There is no issue related immoral action. Company disallow pregnant worker works with chemical material. 	There is no negative issued need further clarification.
LSM Putra Sang Fajar Indonesia/ Kuasa Hukum <ul style="list-style-type: none"> The Supreme Court's decision regarding 131 employees of PT JMS has been implemented, albeit in a gradual manner Agreement on August 24, 2023 that payments will be made in 2 stages, namely with the aim of providing a little leeway in terms of time The first stage of payment has been made on August 30, 2023, which is based on the signed minutes of Rp. 1,447,000,000, and actually paid Rp. 1,443,000,000 The second stage will be paid ± Rp. 2,003,000,000 on September 30, 2023. It is hoped that the company can realize it in accordance with the Minutes that have been signed PT JMS asked for attorneys to withdraw the complaint to the Certification Body, but the process of revoking the complaint will be made when payment is complete September 30 2023 is the deadline, if it is done earlier it will be better and the complaint can be immediately withdrawn from the Certification Body The company has responded positively to the implementation of the Supreme Court's decision After the second stage of payment has been paid, the attorney will make an official report by attaching the minutes of the handover of the plaintiffs to Mutuagung as accountability for the complaint submitted. 	<ul style="list-style-type: none"> The Minutes of Agreement dated 24 August 2023 have been shown, which were attended by members of the National Workers' Union & Advocates, some of the employees referred to in the Supreme Court decision no. 367 K/Pdt.Sus-PHI/2023 and representatives of PT JMS. As for the agreement, the parties agreed that the implementation of the Supreme Court decision no. 367 K/Pdt.Sus-PHI/2023 with an amount of Rp. 3,447,111,935 will be made in stages (2 payments) in the amount of Rp. 1,447,111,935 on August 30, 2023 and amounted to Rp. 2,000,000,000 on September 30, 2023. The Minutes of Payment document dated 30 August 2023 has been shown, which, among other things, explains that compensation has been paid in the form of settlement money for final rights to the second party in accordance with the Collective Agreement which has been signed by each plaintiff or their authorized person, referring to the Supreme Court decision no. 367 K/Pdt.Sus-PHI/2023 totaling 48 people amounting to Rp. 1,443,912,213,- with details attached and signed

Public Issues (Institution/ NGO/Community)	Auditor Verification
	<p>by the party giving it, the party receiving it and witnesses.</p> <ul style="list-style-type: none"> Documents of the Collective Agreement have been shown on August 30, 2023 between PT JMS and the workers who were laid off, for example: <ul style="list-style-type: none"> On behalf of Abdul Wahab with a compensation value as determined by the Supreme Court of Rp. 10,966,422. A Payment Receipt dated 30 August 2023 according to this value has been shown and a Power of Attorney dated 27 August 2023 appointing Mr. Kornelis as the recipient of severance pay, long service awards and replacement of property rights in accordance with the Supreme Court decision. <p>On behalf of Amrullah Nahak with a compensation value as determined by the Supreme Court of Rp. 36,554,740. A Payment Receipt dated 30 August 2023 has been shown according to this value.</p>
<p>LSM Putra Sang Fajar Indonesia/ Kuasa Hukum</p> <p>Regarding the information that the decision of the Supreme Court of the Republic of Indonesia (inkrah) was not implemented at PT. Jaya Mandiri Sukses according to Decision No. 367 K/Pdt.Sus-PHI/2023 dated March 29 2023, you can directly contact the Chairman of the National Workers' Association, o.b. Mr Kornelis.</p>	<p>The auditor has contacted Mr. Kornelis Wiryawan Gatu as the Putra Sang Fajar Indonesia NGO/Legal Attorney for the plaintiff.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Jaya Mandiri Sukses Management Representative</p>  <p>Budi Tri Prasetya Friday, 08 September 2023</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p>Rizliani Aprianita Hasibuan Friday, 08 September 2023</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Plantation Agency	Kutai Kartanegara Regency	-	By phone	15 November 2022	✓	
2	Manpower agency		-	By phone	15 November 2022	✓	
3	Land National Office		-	By phone	15 November 2022	✓	
4	Independent FFB supplier		-	Direct interview	15 November 2022	✓	
5	Representative of Perian, Lebak Mantan, and Muara Leka Village		-	Direct interview	15 November 2022	✓	
6	Previous Land Owner		-	Direct interview	15 November 2022	✓	
7	Worker union (Serbundo)	PT JMS	-	Direct interview	15 November 2022	✓	
8	Keham Lestari smallholder cooperative	Kutai Kartanegara Regency	-	Direct interview	15 November 2022	✓	
9	LSM Putra Sang Fajar Indonesia/ Kuasa Hukum	Kalimantan Timur Province		By Phone	07 September 2023	✓	
10	LSM Putra Sang Fajar Indonesia/ Kuasa Hukum	Kalimantan Timur Province		By Phone	07 September 2023	✓	
11	Estate Workers (49 Workers)	Kutai Kartanegara Regency		Direct interview	15- 16 November 2022	✓	
12	Mill Workers (21 Workers)	Kalimantan Timur Province		Direct interview	15 November 2022	✓	
13	Gender committee	PT JMS	-	Direct interview	15 November 2022	✓	
14	Sawit Watch	Bogor	Email	-	9 November 2022		✓
15	WWF	Jakarta	Email	-	9 November 2022		✓
16	Walhi	Jakarta	Email	-	9 November 2022		✓
17	AMAN	Jakarta	Email	-	9 November 2022		✓

Appendix 2. Assessment Program

DATE	14 – 19 November 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
MONDAY, 14 November 2022		
04.55 – 08.10	Jakarta (CGK) → Samarinda (AAP) (ID-6672)	All Auditor
08.10 – 14.00	Samarinda → Site	
16.00 – 17.00	Opening meeting <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit). Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification). 	All Auditor
TUESDAY, 15 November 2022		
08.00 – 12.00	<ul style="list-style-type: none"> Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier and scheme smallholders Stakeholder consultation to affected communities surrounding the plantations and previous land owner as well as Local NGO. Public consultation with stakeholder to relevant agency in Kutai Kartanegara. <p>Field Observation to Bangkirai Estate & Angsana Estate Aspect to be verified:</p> <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Environmental, Conservation/HCV. Implementation of the Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Workshop, Clinic, Fire Control Facilities, Waste Management). Implementation of Employment Procedure and Mechanism Aspect. Observation of Workers Facilities (Housing, School, Worship Place). Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application). Implementation of Occupational Health & Safety Aspect. 	<p>AAS</p> <p>RPJ</p> <p>RAH/DWN</p>
12.00 – 14.00	Break	
14.00 – 16.30	Field observation to Bangkirai POM: <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Despatch CPO). Processing Activity Implementation of Employment Procedure, OHS and Mechanism Aspect. Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation). POME Pond and Land Application 	<p>AAS</p> <p>RAH/DWN</p> <p>RPJ</p>
16.30 – 17.00	<ul style="list-style-type: none"> Presentation of Daily Progress. 	All Auditor
WEDNESDAY, 16 November 2022		

DATE	14 – 19 November 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 12.00	Field Observation to Gaharu Estate & Jatimas Estate Aspect to be verified: <ul style="list-style-type: none">• Implementation of Legal Aspect (Land Ownership, Legal Boundaries);• Implementation of Environmental, Conservation/HCV.• Implementation of the Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Workshop, Clinic, Fire Control Facilities, Waste Management).• Implementation of Employment Procedure and Mechanism Aspect.• Observation of Workers Facilities (Housing, School, Worship Place).• Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application).• Implementation of Occupational Health & Safety Aspect.	AAS RPJ RAH/DWN
12.00 – 14.00	Break	
14.00 – 16.30	Document review and completing audit checklist	All Auditor
16.30 – 17.00	Presentation of Daily Progress	
THURSDAY, 17 November 2022		
08.00 – 12.00	<ul style="list-style-type: none">• Continued field observation and Public Consultation if needed).• Document review and completing audit checklist.	All Auditor
12.00 – 14.00	Break	
14.00 – 16.30	Document review and completing audit checklist	All Auditor
16.30 – 17.00	Presentation of Daily Progress	
FRIDAY, 18 November 2022		
08.00 – 12.00	<ul style="list-style-type: none">• Continued field observation and Public Consultation if needed).• Document review and completing audit checklist.	All Auditor
12.00 – 14.00	Break	
14.00 – 15.00	Internal discussion by auditor team preparing for Closing Meeting	All Auditor
15.00 – 17.00	Closing Meeting <ul style="list-style-type: none">• Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion)• Comments, Responses and Questions.	All Auditor
SATURDAY, 19 November 2022		
07.00 – 13.00 14.05 – 15.15	PT Jaya Mandiri Sukses & PT Suryabumi Tunggal Perkasa → Samarinda Samarinda (AAP) → Jakarta (CGK) (QG-423)	All Auditor