

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

Name of Management Organization : **Bumi Pratama Khatulistiwa Palm Oil Mill, PT Bumi Pratama Khatulistiwa Subsidiary of Wilmar International Ltd**

Plantation Name : **PT Bumi Pratama Khatulistiwa: Bumi Pratama Khatulistiwa Estate**

Location : **Sungai Tempayan/Mega Timur Village, Sub-District of Sungai Ambawang, Kubu Raya District, Kalimantan Barat Province, Indonesia.**

Certificate Code : **MUTU-RSPO/100**

Date of Initial Registration : **18 October 2017**

Date of Certificate Issue : **19 August 2022**      Date of License Issue : **18 December 2023**

Date of Certificate Expiry : **17 October 2027**      Date of License Expiry : **17 October 2024**

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA 1.1	03 – 07 July 2023	Hasiholan Sihombing (Lead Auditor), Sentot Adi Subandono, Rizki Tanaya and I Wayan Sudi Antara	Moh Arif Yusni	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA 1.1	<b>06 November 2023</b>

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Figure 1. Location Map of PT Bumi Pratama Khatulistiwa

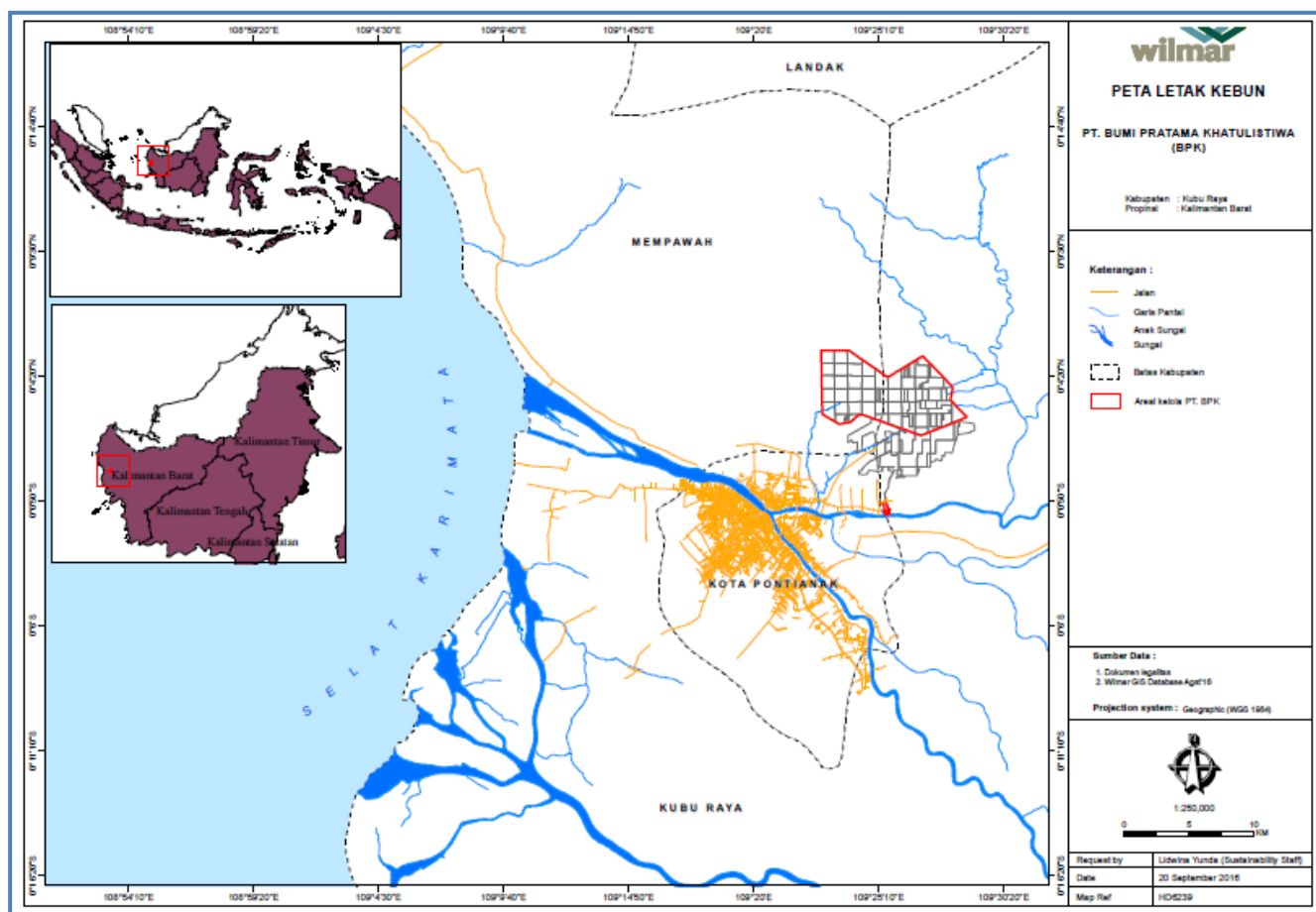
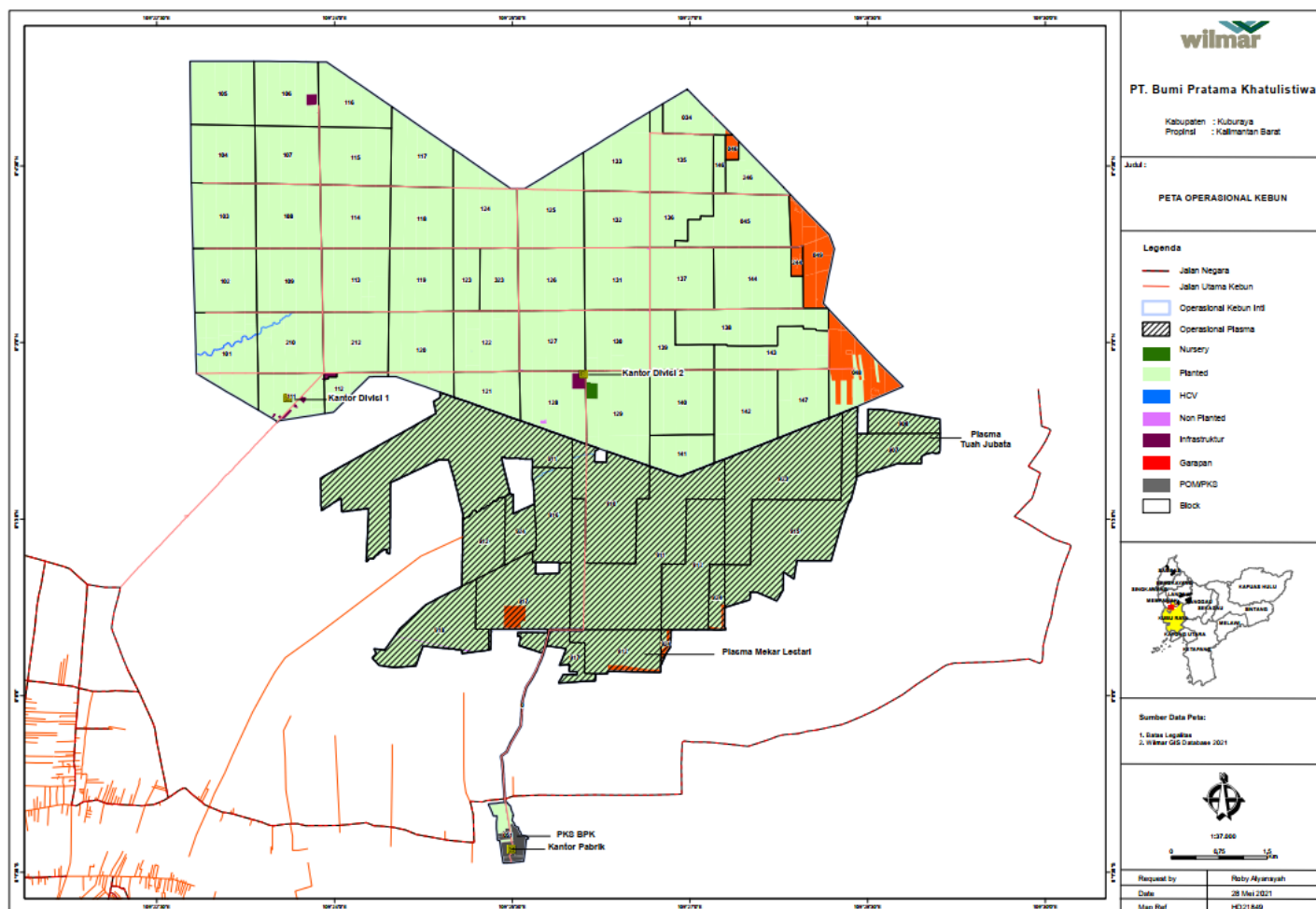


Figure 2. Operational Map of PT Bumi Pratama Khatulistiwa



**Abbreviations Used**

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

POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PR	:	Public Relation
PT BPK	:	PT Bumi Pratama Khatulistiwa
RKL-RPL	:	<i>Rencana Kelola Lingkungan dan Rencana Pemantauan Lingkungan</i> / Environmental Management Plan and Environmental Monitoring Plan
SCCS	:	Supply Chain Certification Standard
SDC	:	System development compliance
SDN	:	<i>Sekolah Dasar Negeri</i>
SIA	:	Social Impact Assessment
SIMPEL	:	<i>Sistem Pelaporan Elektronik</i> / Electronic Reporting System
SMPN	:	<i>Sekolah Menengah Pertama Negeri</i> / Public Middle School
SOP	:	Standard Operating Procedure
SSU	:	Soil Sampling Unit
TTE	:	<i>Tanda Terima Elektronik</i> / Electronic Receipt
UKL-UPL	:	<i>Upaya Kelola Lingkungan dan Upaya Pemantauan Lingkungan</i> / Environmental Management Efforts and Environmental Monitoring Efforts
UPTD	:	<i>Unit Pelaksana Teknis Dinas</i>
UoC	:	Unit of Certification
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE OF THE CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used		
		<ul style="list-style-type: none"><li>• RSPO Certification Systems for Principles &amp; Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.</li><li>• Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th April 2020.</li></ul>	
1.2	Organization Information		
1.2.1	Organization name listed in the certificate	PT Bumi Pratama Khatulistiwa subsidiary of Wilmar International Limited	
1.2.2	Contact person	Jules Sonny Parapat	
1.2.3	Organization address and site address	Head Office: 56 Neil Road Singapore Singapore 088 030.  Liaison office: Multivison Tower Lt. 15 Jl. Kuningan Mulya Blok B9, Kuningan, Jakarta, 12980, Indonesia	
1.2.4	Telephone	(62-21) 29380777	
1.2.5	Fax	-	
1.2.6	E-mail	<a href="mailto:jules.parapat@id.wilmar-intl.com">jules.parapat@id.wilmar-intl.com</a>	
1.2.7	Web page address	<a href="http://www.wilmar-international.com">www.wilmar-international.com</a>	
1.2.8	Management Representative who completed the application for certification	Jules Sonny Parapat (Indonesia Certification Lead)	
1.2.9	Registered as RSPO member	2-0017-05-000-00 dated September 29th, 2004	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Bumi Pratama Khatulistiwa POM and Bumi Pratama Khatulistiwa Estate	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude (S)Longitude (E)
	Bumi Pratama Khatulistiwa POM	Sungai Tempayan/ Mega Timur Village, Sub District of Sungai Ambawang, Kubu Raya District, Province of Kalimantan Barat, Indonesia	S 00° 01' 19"E 109° 25' 28"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude (S)Longitude (E)
	Bumi Pratama Khatulistiwa Estate	Sungai Tempayan/ Mega Timur Village, Sub District of Sungai Ambawang, Kubu Raya District, Province of Kalimantan Barat, Indonesia	N 00° 02' 32"E 109° 23' 36"
1.5	Description of Area Statement		
1.5.1	Tenure		

	<ul style="list-style-type: none"> <li>State (HGU and HGB)</li> <li>Community</li> </ul>	4,842.95 Ha - Ha
	<b>Total</b>	<b>4,842.95 Ha</b>
1.5.2	<b>Area Statement</b>	
	<b>Total area</b>	<b>4,842.95 Ha</b>
	Planted area	4,418.16 Ha
	Mill, Road and Housing	252.04 Ha
	HCV	8.53 Ha
	Unplantable area	2.44 Ha
	Occupation	156.97 Ha
	Nursery	4.81 Ha
1.6	<b>Planting Year and Cycles</b>	
1.6.1	<b>Age profile of planting year</b>	
	<b>Planting Year</b>	<b>BPK Estate (Ha)</b>
	2005	160.56
	2006	25.47
	2009	582.51
	2010	1,110.11
	2011	297.59
	2012	688.72
	2013	924.17
	2014	332.71
	2015	253.50
	2016	42.82
	<b>TOTAL</b>	<b>4,418.16</b>
1.6.2	<b>New Planting area after January 2010</b>	- Ha
1.6.3	<b>Planting Cycle</b>	2 <sup>nd</sup> Cycle
1.7	<b>Description of Mill and Supply Base</b>	
1.7.1	<b>Description of Mill</b>	
	<b>Name of Mill</b>	<b>Capacity</b> (tonnes/ hour)
		<b>FFB Processed</b> (tonnes/year)
		<b>CPO</b> <b>Out put</b> (tonnes)
		<b>Extraction</b> (%)
		<b>Palm Kernel</b> <b>Out put</b> (tonnes)
		<b>Extraction</b> (%)
	BPK POM	30 137,719.39 25,585.33 18.58 5,791.77 4.21
	<i>*Production data source from June 2022 – May 2023</i>	
1.7.2	<b>Description of Certification Scope of Supply Base</b>	
	<b>Name of Estate</b>	<b>Total Area</b> (Ha)
		<b>Production Area</b> (Ha)
		<b>FFB</b> (ton/year)
		<b>Yield</b> (ton/ha/ year)
		<b>Supplied to Mill</b> <b>FFB</b> (ton/year)
		<b>%</b>
	BPK Estate	4,842.95 4,418.16 75,258.23 17.03 75,258.23 100.00
	<i>*Production data source from June 2022 – May 2023</i>	
1.7.3	<b>FFB description from other source</b>	
	<b>Name of sources/ Organization</b>	<b>Type of Organization</b>
		<b>number of smallholders</b>
		<b>Production Area (Ha)</b>
		<b>Supplied to Mill</b> <b>FFB</b> (tones/year)



	Mekar Lestari Cooperative (RSPO Non-Certified)	Independent Smallholder	590	2,000	19,755.98			
	Tuah Jubata Cooperative (RSPO Non-Certified)	Associated Smallholder of PT BPK	53	95.44	1,253.98			
	Blok 051 (RSPO Non-Certified)	PT BPK	-	-	112.03			
	Other suppliers (RSPO Non-Certified)	Independent Supplier	-	-	41,293.01			
	TOTAL				62,415.00			
	<i>*Production data source from June 2022 – May 2023</i>							
	<i>**All FFB from other sources is RSPO non-certified.</i>							
	<i>***Block 051 is an oil palm plant in the mill area (HGB) that is not claimed by the UoC as RSPO certified.</i>							
1.7.4	Product categories		FFB, CPO, PK					
1.8	Tonnage of Product							
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT)	Last Year Actual Certified Volume (June 2022 to May 2023) (MT)				
	FFB Processed		80,000	75,258.23				
	CPO Production		16,000	14,276.12				
	Palm Kernel (PK) Production		3,600	3,266.92				
	<i>*There is an addition of opening stock from May 2022 to CSPO and CSPK production.</i>							
1.8.2	Product selling							
	Type of selling product		Actual selling product for last year (June 2022 to May 2023) (MT)					
	CSPO sold as RSPO certified product		13,793.87					
	CSPK sold as RSPO certified product		3,214.82					
	CSPO sold under another scheme		0					
	CSPK sold under another scheme		0					
	CSPO sold as conventional		0					
	CSPK sold as conventional		0					
1.8.3	Estimate of Certified FFB Claim							
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (tones/year)	Yield (tones/ha/year)			
	BPK Estate	4,842.95	4,418.16	80,000	18.11			
	<i>*Projected FFB production for 12 months of certificate</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tones/ hour)	FFB Processed (tones/year)	CPO Out put (tones)	Extraction (%)	Palm Kernel Out put (tones)	Extraction (%)	Supply Chain Module
	BPK POM	30	80,000	16,000	20.00	3,600	4.50	MB
	<i>*Projected FFB production for 12 months of certificate</i>							
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			-				

Others						
1.10	Time Bound Plan					
1.10.1	Time Bound Plan for Other Management Units					
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status
	Mill	Time Bound Plan				
	Indonesia – Kalimantan Region					
	Mustika Sembuluh 1 POM Mustika Sembuluh POM 2 (PT Mustika Sembuluh)	2010	Mustika Sembuluh 1	2010	Kalimantan Tengah	Certified
		2015	Mustika Sembuluh 2	2010	Kalimantan Tengah	Certified
			Mustika Sembuluh 3	2010	Kalimantan Tengah	Certified
			KUD Bitu Maju Bersama	2014	Kalimantan Tengah	Certified
	Kerry Sawit Indonesia 1 POM  Kerry Sawit Indonesia 2 POM (PT Kerry Sawit Indonesia)	2011	Kerry Sawit Indonesia 1	2011	Kalimantan Tengah	Certified
			Kerry Sawit Indonesia 2	2011	Kalimantan Tengah	Certified
			Kerry Sawit Indonesia 3	2011	Kalimantan Tengah	Certified
		2015	KUD Karya Bersama	2026	Kalimantan Tengah	-
			KUD Sejahtera Bersama	2026	Kalimantan Tengah	
			KUD Tabiku Makmur	2026	Kalimantan Tengah	
			KUD Kosudra	2026	Kalimantan Tengah	
	Bumi Sawit Kencana POM (PT Bumi Sawit Kencana)	2013	Bumi Sawit Kencana 1	2013	Kalimantan Tengah	Certified
			Bumi Sawit Kencana 2	2013	Kalimantan Tengah	Certified
	POM 1 and POM 2 (PT Sarana Titian Permata)	2026	Sarana Titian Permata 1	2026	Kalimantan Tengah	-
			Sarana Titian Permata 2	2026	Kalimantan Tengah	-
			Sarana Titian Permata 3	2026	Kalimantan Tengah	-
	Mentaya Sawit Mas POM (PT Mentaya Sawit Mas)	2015	Mentaya Sawit Mas 1	2015	Kalimantan Tengah	Certified
			Mentaya Sawit Mas 2	2015	Kalimantan Tengah	Certified
			KUD Karya Makmur Pahirangan	2026	Kalimantan Tengah	-
	Rimba Harapan Sakti POM (PT Rimba Harapan Sakti)	2015	Rimba Harapan Sakti 1	2015	Kalimantan Tengah	Certified
			Rimba Harapan Sakti 2	2015	Kalimantan Tengah	Certified
			Serba Usaha Makmur Sejahtera Cooperative	2026	Kalimantan Tengah	-
	Karunia Kencana Permaisejati POM (PT Karunia Kencana Permaisejati)	2017	Karunia Kencana Permaisejati 1	2017	Kalimantan Tengah	Certified
			Karunia Kencana Permaisejati 2	2017	Kalimantan Tengah	Certified
			Karunia Kencana Permaisejati 3,	2017	Kalimantan Tengah	Certified
Agro Nusa Investama POM (PT Agro Nusa Investama (Sambas))	2019	Agro Nusa Investama (Sambas) Estate	2019	Kalimantan Barat	Certified	
		KUD Cempaka Biru	2019	Kalimantan Barat	Certified	
		KUD Sentama Lestari	2019	Kalimantan Barat	Certified	
		Sri Maram Estate	2026	Kalimantan Barat	-	
		Sri Maram Cooperative	2026	Kalimantan Barat	-	
		Pusaka Abadi Nan Jaya Cooperative	2026	Kalimantan Barat	-	

			Anugrah Semaro Cooperative	2026	Kalimantan Barat	-
	Bumipratama Khatulistiwa POM (PT Bumi Pratama Khatulistiwa)	2016	Bumi Pratama Khatulistiwa Estate	2016	Kalimantan Barat	Certified
			PT Buluh Cawang Plantation	2026	Kalimantan Barat	-
			KUD Tuah Jubata	2026	Kalimantan Barat	-
	Agro Nusa Investama (Landak) POM PT Agronusa Investama - Pahauman	2023	PT Agronusa Investama Pahauman Estate	2026	Kalimantan Barat	-
			Pratama Procentindo Estate (PT Pratama Procentindo)	2026	Kalimantan Barat	-
	Agro Palindo Sakti POM (PT Agro Palindo Sakti 2)	2023	Agro Palindo Sakti Estate	2026	Kalimantan Barat	-
			Putra Indotropical Estate (PT Putra Indotropical Estate)	2026	Kalimantan Barat	-
			Daya Landak Plantation Estate (PT Daya Landak Plantation)	2026	Kalimantan Barat	-
			Indoresin Putra Mandiri (PT Indoresin Putra Mandiri)	2026	Kalimantan Barat	-
<b>Indonesia – Sumatera Region</b>						
	Pinang Awan POM (PT Perkebunan Milano)	2009	Sei Daun	2009	Sumatera Utara	Certified
			Batang Saponggol	2009	Sumatera Utara	Certified
			Marbau	2009	Sumatera Utara	Certified
	Tania Selatan POM (PT Tania Selatan)	2010	Burnai Barat	2010	Sumatera Selatan	Certified
			Burnai Timur	2010	Sumatera Selatan	Certified
	Kencana Sawit Indonesia POM (PT Kencana Sawit Indonesia)	2011	Kencana Sawit Indonesia (Division 1, Division 2 and Division 3)	2011	Sumatera Barat	Certified
	AMP Plantation POM (PT AMP Plantation)	2011	AMP I	2011	Sumatera Barat	Certified
			AMP II	2011	Sumatera Barat	Certified
			AMP III	2011	Sumatera Barat	Certified
			AMP IV	2011	Sumatera Barat	Certified
			Primatama Mulia Jaya	2011	Sumatera Barat	Certified
			Tompek Tapian Kandis cooperative	2014	Sumatera Barat	Certified
			Mutiara Sawit Jaya cooperative	2014	Sumatera Barat	Certified
			Bukit Sandiang Tigo cooperative	2014	Sumatera Barat	Certified
			Agro Wira Masang cooperative	2014	Sumatera Barat	Certified
	Buluh Cawang Plantation POM (PT Buluh Cawang Plantation)	2012	Bumi Arjo	2012	Sumatera Selatan	Certified
			Dabuk Rejo	2012	Sumatera Selatan	Certified
			Sukamulya	2012	Sumatera Selatan	Certified
			Bambu Kuning	2012	Sumatera Selatan	Certified
	Gersindo Minang Plantation POM	2012	Gersindo Minang Plantation	2012	Sumatera Barat	Certified

	(PT Gersindo Minang Plantation)		Permata Hijau Plantation 1	2012	Sumatera Barat	Certified
			Permata Hijau Plantation 2	2012	Sumatera Barat	Certified
			PT Permata Hijau Pasaman (block 22)	2026	Sumatera Barat	-
	Daya Labuhan Indah POM (PT Daya Labuhan Indah)	2013	Wonosari	2013	Sumatera Utara	Certified
			Sei Deras	2013	Sumatera Utara	Certified
			Cabang Dua (PT Milano)	2013	Sumatera Utara	Certified
	Murini Samsam POM (PT Murini Sam Sam)	2015	Murini Sam Sam Estate	2015	Riau	Certified
			Part of PT Murini Samsam areas (466 ha)	2026	Riau	-
	Musi Banyuasin POM (PT Musi Banyuasin Indah)	2023	Sei Selabu	2026	Sumatera Selatan	-
			Sei Jarum	2026	Sumatera Selatan	-
			Agro Palindo Sakti Estate	2022	Sumatera Selatan	Certified
	Sinarsiak Dianpermai POM (PT Sinarsiak Dianpermai)	2023	Sinarsiak Dianpermai Estate	2026	Riau	-
	Agro Indah Persada 2 POM (PT. Agroindo Indah Persada)	2023	Agroindah Indah Persada Estate	2026	Bangka – Jambi	-
	<b>Malaysia</b>					
	Sapi POM (PPB Oil Palms Berhad)	2008	Sapi 1	2008	Sandakan, Sabah, Malaysia	Certified
			Sapi 2	2008	Sandakan, Sabah, Malaysia	Certified
			Kiabau	2008	Sandakan, Sabah, Malaysia	Certified
	Reka Halus POM (PPB Oil Palms Berhad)	2008	Reka Halus	2008	Sandakan, Sabah, Malaysia	Certified
	Sabahmas POM (PPB Oil Palms Berhad)	2008	Sabahmas	2008	Lahad Datu, Sabah, Malaysia	Certified
	Saremas 1 POM (PPB Oil Palms Berhad)	2010	Saremas	2010	Bintulu, Serawak, Malaysia	Certified
			Saremas 2 (Div D)	2010	Bintulu, Serawak, Malaysia	Certified
			Suai	2010	Bintulu, Serawak, Malaysia	Certified
	Saremas 2 POM (PPB Oil Palms Berhad)	2010	Saremas 2 (exclude Div D)	2010	Bintulu, Serawak, Malaysia	Certified
			Kaminsky	2010	Bintulu, Serawak, Malaysia	Certified
			Segarmas	2010	Bintulu, Serawak, Malaysia	Certified
	Ribubonus (PPB Oil Palms)	2010	Ribubonus	2010	Sandakan, Sabah, Malaysia	Certified

	Berhad)					
	Terusan POM (PPB Oil Palms Berhad)	2010	Terusan 1 + 2	2010	Sandakan, Sabah, Malaysia	Certified
			Rumidi	2010	Sandakan, Sabah, Malaysia	Certified
	Sri Kamusan POM (PPB Oil Palms Berhad)	2011	Sri Kamusan	2011	Sandakan, Sabah, Malaysia	Certified
			Hibumas 1	2011	Sandakan, Sabah, Malaysia	Certified
			Hibumas 2	2011	Sandakan, Sabah, Malaysia	Certified
			Jebawang	2011	Sandakan, Sabah, Malaysia	Certified
			Sekar Imej	2011	Sandakan, Sabah, Malaysia	Certified
			Sapi Sugut	2011	Sandakan, Sabah, Malaysia	Certified
			Laba Utama (Div of Jebawang)	2023	Sandakan, Sabah, Malaysia	Acquired in 2019, 3 years till certification deadline (2022); but postponed till 2023 due to Covid-19 which impeded movement of ssessor for SIA, HCV/ HCS assessments
	Suburmas POM (PPB Oil Palms Berhad)	2023	Suburmas	2023	Bintulu, Serawak, Malaysia	Added into Wilmar Membership in 2018, 3 years till certification deadline (2021); but postponed till 2023 due to Covid-19 which impeded movement of assessor for SIA, HCV/ HCS assessments
	<b>Africa</b>					
	BOPP POM, Biase Plantation Limited	2014	Adum Bansa	2014	Western Region, Ghana	Certified
			Scheme Smallholder	2014	Western Region, Ghana	Certified
	-	-	Treboum Smallholders	2023	Western Region, Ghana	
	Biase Plantation Limited	2021	Calaro	2021	Cross River State, Nigeria	Certified
	Biase Plantation	2022	Calaro extension	2023	Cross River State,	To be certified,

	Limited				Nigeria	NPP completed
	Biase Plantation Limited	2020	Ibiae	2023	Cross River State, Nigeria	To be certified, NPP completed
	Eyop Industries	2021	Ibad	2025	Cross River State, Nigeria	To be certified
	Eyop Industries	2020	Kwa Falls	2025	Cross River State, Nigeria	To be certified
	Eyop Industries	2021	Oban	2025	Cross River State, Nigeria	To be certified
<p><i>*Time bound plan Indonesia update October 2022, Malaysia update October 2022, Africa update October 2022</i></p> <p>The revision of time bound plan because there is the change of certification time plan to 2022, 2023, and 2025 for some uncertified management units with reason is still in process to get land use right (Hak Guna Usaha) for some unit in Indonesia, pending NPP assessment for some unit in Africa, and delayed certification due to Covid-19 for some unit in Africa and Malaysia.</p> <p>Regarding the TBP more than 2023, Wilmar has communicated about the TBP to RSPO on 10 August 2022. RSPO response about the TBP is RSPO approved on 07 October 2022 the latest TBP with some notes to take into consideration by Wilmar.</p>						
1.10.2	<b>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</b>					
	<p>In the previous onsite assessment (ASA-3), there was an OFI regarding completing the fulfillment of the RSPO certification for the PT BPK smallholder scheme. During the last RC assessment, it was verified that Mekar Lestari Cooperative had been excluded from the time-bound plan and now became independent smallholders, and KUD Tuah Jubata Cooperative planned to be certified in 2026 as mentioned in the time-bound plan.</p>					



<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>ASA 1.1</b>	<p><b>1. Hasiholan Sihombing (Lead Auditor).</b> Indonesian citizen. Bachelor of Agriculture Majoring in Agronomy, Agriculture Faculty. He has working experienced for 7 (seven) years since 2009 as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The training he has followed namely: Lead Auditor ISPO in 2016, RSPO P&amp;C Lead Auditor Course in 2018, RSPO Supply Chain Certification Lead Auditor Course in 2020, SA 8000 Awareness in 2018, Quality Management Systems (ISO 9001:2015) in 2016, Environmental Management Systems (ISO 14001:2015) in 2017, OHS General Expert in 2013, OHSAS 18001:2007 in 2017, ISO 19011:2018 in 2019, ISO 17021:2011 and ISO 17065:2012 in 2016. During this audit, he assigned to verify legal aspect, land dispute, environment, GHG and SCCS.</p> <p><b>2. Sentot Adi Subandono (Auditor).</b> Indonesian citizen, Bachelor of Agriculture, Department of Agricultural Cultivation. He has five years of experience working since 2005 as Plantation Operational Staff and nine years as Internal Auditor in private oil palm plantations in Indonesia. The training that has been attended includes the Basic Management Development Program of Palm Oil Plantation, Use of Limited Pesticides, Best Practices in Internal Auditing, Fraud Auditing: Prevention, Detection, and Investigation, Operational Risk Approach in Internal Auditing, General Occupational Health, and Safety Expert, ISPO Auditor Training in 2016, ISO 9001: 2015, RSPO Lead Auditor Training in 2021, and SMETA awareness training. During this assessment, the aspects of BMP, OHS, Long Term Budget were verified.</p> <p><b>3. Rizki Tanaya (Auditor).</b> Indonesian citizen, Bachelor of Agriculture, Majoring Socio-Economic Agriculture, Padjadjaran University. Training that has been attended include ISPO Auditor Training and Refreshment New ISPO Ministry of Agriculture 38 of 2020, RSPO SCCS Auditor Training, RSPO P&amp;C Lead Auditor Training, ISO 9001:2015 Lead Auditor Training, General OHS Expert Training, ISO 19011:2018, ISO 17021:2015, ISO 17065:2012, ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, ISO 50001:2018, FSC CoC, BAP, SEDEX/SMETA, and Global GAP. Has carried out several audit activities on environmental, conservation, Best Management Practices, OHS, Labour and Social aspects. In this audit activity, verification is carried out on aspects of Worker welfare and transparency.</p> <p><b>4. I Wayan Sudi Antara (Auditor).</b> Bachelor of Agricultural Engineering at the IPB University Bogor. Experienced in preparing Environment Impact Assessment since 1990 (has a competency certificate for Team Leader for EIA Preparation), involved as an auditor assessing the performance of Sustainable Production Forest Managers for both the Indonesian Ecolabel Institute/LEI scheme since 1997 and the Ministry of Forestry scheme since 2002 (has Auditor and LEI certificates). Previously worked at a Forestry Consultant, experienced in ISPO &amp; RSPO assessment as an auditor (has passed ISPO &amp; RSPO training). The training he has followed namely: Awareness ISO 17021, Awareness ISO 17065, Awareness ISO 9001, Awareness ISO 14001, Awareness ISO 45001, and Awareness ISO 19011. During this assessment, he verified the aspects of environment, Social, conservation and GHG aspect.</p>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
<b>ASA 1.1</b>	<p>Number of auditors: 4 auditors</p> <p>Number of days for ASA 1.1 onsite audit: 5 days</p> <p>Number of working days for ASA 1.1 onsite audit: 20 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>ASA 1.1</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Bumi Pratama Khatulistiwa – BPK POM to the requirements of <b>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 &amp; Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.</b></p> <p>The scope of certification of PT Bumi Pratama Khatulistiwa subsidiary of Wilmar International Ltd operation consisting of one (1) mill (BPK POM) with supply base one (1) own estate (BPK Estate).</p>

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

The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to directly observe the sufficiency of implementation on site.

The opening meeting was held on 3 July 2023. As for the participants who attended the opening meeting included Estate and Mill Managers, Support Team from Jakarta, and other staff at PT Bumi Pratama Khatulistiwa. Closing meeting was held on 7 July 2023 attended by the same participants as the opening meeting. Management PT Bumi Pratama Khatulistiwa accept all the onsite ASA-1.1 audit results.

The assessment program please find Appendix 2.

<b>2.2.3</b>	<b>Locations of Assessment</b>
<b>ASA 1.1</b>	<p>The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that observed via video by team auditor are:</p> <p><b>Bumi Pratama Khatulistiwa Estate</b></p> <ul style="list-style-type: none"> <li>• <b>HGU Pole No. T115A.</b> Observation of the condition of the HGU boundary markers owned by the company.</li> <li>• <b>HGU Pole No. T40A Block 128E.</b> Observation of the condition of the HGU boundary markers owned by the company.</li> <li>• <b>HGU Pole No. T32A Block 121E.</b> Observation of the condition of the HGU boundary markers owned by the company.</li> <li>• <b>HGU Pole No. T14B Block 101A.</b> Observation of the condition of the HGU boundary markers owned by the company.</li> <li>• <b>HGB Pole No. BPN 01.</b> Observation of the condition of the HGB boundary markers owned by the company.</li> <li>• <b>HGB Pole No. BPN 02.</b> Observation of the condition of the HGB boundary markers owned by the company.</li> <li>• <b>HCV Ampening River Riparian Area, Block 49 Division 2.</b> Observation the implementation of management in HCV on Occupation HCV area.</li> <li>• <b>HCV Kongsu River Riparian Area, Block 49 Division 2.</b> Observation the implementation of management in HCV on Occupation HCV area.</li> <li>• <b>HCV Malaya River Riparian Area (Upstream), Block 210C Division 1.</b> Observation the implementation of management in HCV of riparian area.</li> <li>• <b>HCV Malaya River Riparian Area (Downstream), Block 21A Division 1.</b> Observation the implementation of management in HCV of riparian area.</li> <li>• <b>Nursery.</b> Observations and interviews with management representatives regarding nursery techniques and seedling conditions.</li> <li>• <b>Fire Tower, Blok 114 C Phase 2 Division 1.</b> Field observation about the condition of fire tower and OHS aspect.</li> <li>• <b>Harvesting, Division 4 Phase 4 Block 146A and Division 2 Phase 3 130D.</b> Observation and interviews with foreman and harvester related FFB quality, worker welfare OHS, and employment.</li> <li>• <b>Beneficial plants such as <i>Turnera subulate</i> and <i>Antigonon leptopus</i> Block 112 B Phase 2 Division 1 and Block 128-129 Phase 3 Division 2.</b> Observation about IPM implementation.</li> <li>• <b>Barn Owl Box, Block 113A Phase 2 Division 1.</b> Observation about IPM implementation.</li> <li>• <b>Logger, Block 115 A.</b> Observation about GAP implementation on peat.</li> <li>• <b>Subsidence pole, Block 146 Phase 4 Division 2.</b> Observation about GAP implementation on peat.</li> <li>• <b>Weirs and Stick pole, Block 212 B Phase 2.</b> Observation about water management implementation on peat.</li> <li>• <b>Manuring, Division 2 Phase 3 Block 31E.</b> Observation and interview with personnel on their understanding towards technical, OHS, Labour and environment aspects, as well as facilities provided by the certification unit.</li> <li>• <b>Spraying, Division 1 Phase 2 Block 106A.</b> Observation and interview with personnel on their understanding</li> </ul>



towards technical, OHS, Labour and environment aspects, as well as facilities provided by the certification unit.

- **Block attacked by Ganoderma, Block 045.** Observation and interview about Ganoderma.
- **Agrochemical storage.** Observation and interview about worker welfare, hazardous waste management, OHS implementation, and understanding of work procedure.
- **Fertilizer storage.** Observation and interview about worker welfare, OHS implementation, and understanding of work procedure.
- **Material storage.** Observation and interview about worker welfare, OHS implementation, and understanding of work procedure.
- **Central Storage.** Field Observation and interviews related to PPE, environmental, handling material, and OHS aspects.
- **Hazardous Waste Temporary Storage.** Observation related to storage condition, hazardous waste stock, emergency response facility, and waste management.

#### Bumi Pratama Khatulistiwa Mill

- **Sortation Station.** Observation and interview with personnel on their understanding towards technical, OHS, License, Labour and environment aspects, as well as facilities provided by the certification unit.
- **Sterilizer Station.** Observation and interview with personnel on their understanding towards technical, OHS, License, Labour and environment aspects, as well as facilities provided by the certification unit.
- **Boiler Station.** Observation and interview with operators on their understanding towards technical, OHS, License, Labour and environment aspects, as well as facilities provided by the certification unit.
- **Engine Room.** Observation and interview with Operators on their understanding towards technical, OHS, License, Labour and environment aspects, as well as facilities provided by the certification unit.
- **Station Press.** Observation and interview with personnel on their understanding towards technical, OHS, License, Labour and environment aspects, as well as facilities provided by the certification unit.
- **Station Kernel.** Observation and interview with personnel on their understanding towards technical, OHS, License, Labour and environment aspects, as well as facilities provided by the certification unit.
- **Hydrant Simulation in Boiler Station Area.** Observation related to emergency response, readiness of firefighting equipment.
- **Chemical warehouse.** Observation and interview related to chemical management, OHS, and environmental aspect.
- **Oil warehouse.** Observation and interview related to chemical management, OHS, and environmental aspect.
- **Fuel Tank.** Observation and interview related to chemical management, OHS, and environmental aspect.
- **Material Warehouse.** Observation and interview related to material management, OHS environmental, and worker welfare aspect.
- **Hazardous Waste Temporary Warehouse.** Observation and interview related to hazardous waste management, OHS and environmental aspect.
- **Workshop.** Observation and interview related to workshop activity, OHS, environmental and worker welfare aspect.
- **Security.** Observation and interview with worker related to incoming FFB activity, OHS, environmental and worker welfare aspect.
- **Weighbridge.** Field observations and interview related to working procedure, worker aspect, ethical aspect, and social aspect.
- **WWTP.** Field observation related POME Management
- **Empty Bunch Area.** Field observation related Management of solid waste and leachate
- **Water Intake.** Field observation related water intake.
- **Housing.** Field observations on infrastructure and feasibility of residential houses and public facilities.

2.3	<b>Stakeholder Consultation and Stakeholders Contacted</b>
2.3.1	<b>Summary of stakeholder consultation process.</b>
ASA 1.1	Summary of stakeholder consultation process Consultation of stakeholders for PT Bumi Pratama Khatulistiwa was held by:

	<ol style="list-style-type: none"> <li>1. Public Notification on Website PT Mutuagung Lestari on 19 June 2023.</li> <li>2. Public consultation with NGOs (by email) such as WWF, Walhi, AMAN and Sawit Watch on 23 June 2023.</li> <li>3. Public consultation by phone with government institution in Kubu Raya Regency 4 July 2023.</li> <li>4. Public consultation meeting with communities including previous landowner on 4-5 July 2023.</li> <li>5. Public consultation meeting with internal stakeholders and contractors 4 July 2023.</li> </ol> <p>Numbers of input from stakeholders were clarified by PT Bumi Pratama Khatulistiwa as part of this report.</p>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	Please find appendix 1
<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit ( <b>ASA-1.2</b> ) will be conducted nine (9) months until 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 assessed Bumi Pratama Khatulistiwa POM – PT Bumi Pratama Khatulistiwa, Wilmar Intl Ltd operation consisting of one (1) mill and one (1) oil palm estates.

During the assessment, there were one (1) Nonconformity were assigned against Major Compliance Indicator; two (2) 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 actions that had been reviewed and accepted by Auditors in form of documentation evidence e.g. (document record/photographic/etc). Those corrective actions taken that consist of one (1) Major non-conformity had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Bumi Pratama Khatulistiwa POM – PT Bumi Pratama Khatulistiwa, Wilmar Intl Ltd 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 System for Principles and Criteria, 14 June 2017.**

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>	
<b>1.1</b>	<b>The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</b>
<b>1.1.1</b>	<p>The company already has a list of information/documents that can be accessed by stakeholders such as government agencies and NGOs presented in SOP 52/WIP-KB/(01)/1015 dated October 1, 2015, regarding the providing information to outsiders (transparency). The procedure explains that the provision of information to the public can be done through a direct interview visit or review of documentation at the head office or representative PT. Bumi Pratama Khatulistiwa. The procedure also states the document which can be accessed by stakeholder, such as:</p> <ul style="list-style-type: none"> <li>• HGU certificate</li> <li>• AMDAL/SEIA document</li> <li>• Yearly company report</li> <li>• RKL-RPL report, hazardous management report and POME management report.</li> <li>• HCV (High Conservation value) Assessment</li> <li>• POME permit</li> <li>• Hazardous storage permit</li> <li>• Social Impact Assessment</li> <li>• Vision and mission of the company</li> <li>• Sustainability policy</li> <li>• Environmental Policy</li> <li>• OHS policy, quality and CSR</li> <li>• HCV policy</li> <li>• Environmental work program</li> <li>• OHS work program</li> <li>• Logbook information</li> </ul>

Based on interviews with local communities, local contractors, and internal stakeholders, it is known that the company has conducted socialization regarding the procedures for requesting information and has assigned a person in charge to respond to requests for information. Each party also knows the types of general information that can be accessed. It was further explained that publicly accessible documents are specific documents for each operational unit.

### 1.1.2

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

#### Compliance with Social and Environmental Regulation

The company has shown Report of environment documents:

- Semester RKL-RPL report, example RKL-RPL report for semester 2 of 2022 which was reported on 14 February 2023 to DLH and Forestry Prov. Kalimantan Barat, DLH Kubu Raya Regency, Disbun Prov. Kalimantan Barat and Disbunak Kab. Kubu Raya.
- Quarterly LB3 management report, for example 1st Quarter 2023 LB3 Management Report dated 6 April 2023 to DLH and Forestry Prov. Kalimantan Barat, DLH Kubu Raya Regency.
- Report on Liquid Waste Management and River Water every 3 months, for example Report on Management of Liquid Waste and River Water Quarter-1 2023 dated 6 April 2023 to DLH and Forestry Prov. Kalimantan Barat, DLH Kab. Kubu Raya
- Electronic Receipt of the Ministry of Environment and Forestry Electronic Reporting Information System (SIMPEL) available for the TTE period: 01-01-2023 to 30-06-2023 with TTE ID: 1688173105-1126. For RKL-RPL Reports, PPA Reports, PLB3 Reports

#### Compliance with Best Management Practices Regulation:

The CH has shown documentary evidence of providing information to stakeholders, such as:

- OHS Organization of PT BPK Estate - Quarterly Report 4 of 2022 is reported to the Kalimantan Barat Provincial Manpower Office through the e-SIPPPDA (*Elektronik – Sistem Informasi Pelaporan P2K3 Daerah*) application on January 30, 2023.
- OHS Organization of PT BPK Estate - Quarterly Report 1 of 2023 is reported to the Kalimantan Barat Provincial Manpower Office through the e-SIPPPDA application on May 02, 2023.
- OHS Organization of PT BPK Mill - Quarterly Report 4 of 2022 is reported to the Kalimantan Barat Provincial Manpower Office through the e-SIPPPDA (*Elektronik – Sistem Informasi Pelaporan P2K3 Daerah*) application on January 23, 2023.
- OHS Organization of PT BPK Mill - Quarterly Report 1 of 2023 is reported to the Kalimantan Barat Provincial Manpower Office through the e-SIPPPDA application on April 10, 2023.

#### Compliance with Legal Regulation:

- Plantation progress report (LPUP) of PT BPK period of Semester II 2022 has been sent to Plantation Agency of Kubu Raya District on 30 January 2023.
- HGU utilization report of PT BPK for the period of 2022 has been sent to Land Agency of Kubu Raya District on 30 January 2023.

#### Compliance with manpower Regulation:

- Report of the 2022 Semester II Bipartite Cooperation Institute to the Office of Transmigration and Manpower of the Kubu Raya Regency on 31 December 2022.
- Report of the Bipartite Cooperation Institute Semester I of 2023 to the Office of Transmigration and Manpower of the Kubu Raya Regency on 30 June 2023.

Based on interview with the Office of Transmigration and Manpower of the Kubu Raya Regency, inform that stakeholders aware of the type of information available and how to get access to the information.

### 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 Union Worker dated February 6, 2023, with number 603/SBKB/II/2023 about proposal of meeting with management and company has responded on March 28, 2023.

Based on interviews with representatives of Sungai Enau Village and agencies related in Kubu Raya Regency, it is known that the company has conducted outreach to the stakeholder regarding the mechanism for requesting information from the company. If there is a request for information, the stakeholder will send a letter to the company and the company will respond.

#### 1.1.4

The company has procedures related to communication and consultation which are listed in document number: SOP58/WIP-KB/(0)/0915 dated September 1, 2015, concerning Procedures for Open Mechanism for Implementation of Communication and Consultation with the Community. The procedure for implementing the communication and consultation mechanism with the community must comply with the following provisions:

- Analyse proposals/aspirations/complaints or even community demands that require immediate discussion and handling.
- Determine the company policies that will be taken in addressing the matters mentioned above.
- Coordinate with the community to schedule a meeting to open lines of communication and consultation as soon as possible.
- Delivering company policies to the public and conducting joint discussions to maintain the interests of both parties.
- Analyse and draw conclusions on the material discussed with the community and then submit it to company management.
- Conduct socialization and certain steps to follow up on the results of discussions with the community.

The company has shown documents related to communication and consultation socialization, which were shown by the company, the minutes of socialization of the submission of complaints by stakeholders on January 10, 2023, to 80 participants from the community and public relations.

The person responsible for communication and consultation with stakeholders is the CSR and public relations. Job descriptions are available for the CSR and public relations sections, including building relationships with local leaders and communities.

Based on the results of interviews with several stakeholders, for example from villages, cooperatives, government agencies, and contractors, the implementation of consultation and communication has been going well and the company responded in accordance with the procedure.

#### 1.1.5

Company already has a stakeholder list update until July 2023, which contains the names, positions, and telephone numbers of the local Sub District, Village Head, Sub-Village Head, Police, Health Facilities, Government Agencies of Kubu Raya Regency, NGOs, educational institutions, Suppliers, and contractors. Internal stakeholders that listed in the documents such gender committee and worker union. Auditor checks by calling the numbers recorded in the document, from the results of checking that the phone numbers are in accordance with the existing list.

Status: Comply

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

#### 1.2.1

The certification unit has code of conduct updated Verse 5 June 2019. Code of conduct explain Code of Conduct Principles, Conflict of Interest, Bribery and Illegal or Unethical Practices, Entertainment and Gifts, Misuse of Position, Insider Trading, Confidentiality, Restriction on Solicitation, Media Relations, Trade Union, Political and Social Activities, Installation of Illegal Computer Software, Anti Money Laundering, Trade Compliance & Export Controls and Sanctions, and Commitment to Human Rights.

The certification unit shows documentation of socialization of policies and regulations that apply in unit certification to relevant stakeholders, some examples include:

- Minutes of socialization on January 10, 2023, regarding Dissemination of the Code of Ethics, Company Regulations, Human Rights Policy and SOP for Complaints & Complaints to employees attended by 80 employees.
- Socialization of SOP Procedures for Requesting and Accepting Complaints/suggestions and Company Policy and Human Rights on February 16, 2023, which was attended by 65 employees.
- Socialization of Company Policy and Human Rights for Contractors in PT Bumi Pratama Khatulistiwa on February 11, 2023, which was attended by 11 attendances.

The certification unit shows examples of the implementation of the code of business ethics in terms of recruitment and labour

contracts, for example: job vacancy information on May 22, 2023, which was submitted through each village representative to be further submitted to each of its residents, the selection process for prospective employees was carried out for 27 days from on May 23 – June 17, 2023. The certification unit can show an example of documentation of new hires for 2023 as follows:

- a. Job application letter for prospective employees with the initials SWR.
- b. Employee Identity Document with the initials SWR.
- c. Work Agreement Letter No. 157/BPK-HRR/SK/V/2023 dated May 25, 2022, between the HRR Manager of PT BPK and the employee initials SWR for the work of maintenance (loose picker FFB).

### 1.2.2

The system to monitor compliance with ethical policies is carried out through internal audit and monitoring complaints. From the results of the verification of the complaint document and interview with stakeholders known that there were no complaints related to violations of ethical behavior.

In addition, the company also routinely conducts internal audits every year covering aspects of the RSPO including ethical behavior. The RSPO internal audit conducted on March 22, 2023. And from the results of the internal audit conducted, there is no indication of a violation of ethical behavior.

**Status: Comply**

## PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

### 2.1

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

#### 2.1.1

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

#### Compliance with Legal Regulation:

PT BPK has been obtained Business Permit based on Decree of the Head of the Investment Service and One Stop Service Number 07 of 2022 dated January 20, 2022, concerning the PT Bumi Pratama Khatulistiwa Plantation Business Permit, with detail:

- Commodity: Palm Oil Plantation
- Area: 4,842.95 Ha
- Location: Subdistrict of Kuala Mandor B and Sungai Ambawang, Regency of Kubu Raya
- Mill Capacity 60 MT/hours

#### Compliance with Best Management Practices Regulation:

The company has complied with several legal compliances, for example:

- The CH controls weeds and pests using pesticides that are registered with the Directorate General of Fertilizers and Pesticides, such as Supremo with the RI register number. 0103020021712 and Chepate with RI registration number. 01010120093588.
- The CH has a POM that works 2 shifts, has 2 boilers with a capacity of 25 tons/hour with 5 class 1 licensed OHS operators and 1 class 2 person who is still active. POM also has an engine room that works 3 shifts and has 3 generators with a capacity of 80 KW, 200 KW, and 400 KW, and 1 active OHS Electrician/Electric Technician. There is also a welding machine and 5 certified welders.
- On the estate, from the results of the document review it is known that The CH has 15 tractors for shunting FFB and fertilizing as well as 15 operators with active OHS licenses. There are also 2 excavators operating with 5 active OHS license operators; 1 road grader with an active OHS license operator; 2 Backhoe Loaders with 2 active OHS license operators; have 2 licensed Welders; 2 paramedics with Hiperkes certificate; and 2 licensed first aid workers. The results of field observations on FFB transportation activities show that the Tractor Operator with the initials Msl has an active license until April 13, 2026.

#### Compliance with Social and Environment Regulation:

- Environmental permit in the form of AMDAL Document for Plantation Activities and Palm Oil Processing Factory (2004), available for approval from the Pontianak Regency AMDAL Commission (a.n. Pontianak Regent) based on Letter No. 660.1/024.a/IV/DLHESDM-B dated 08 April 2004. The scope of the AMDAL study covers an area of 6,814.96 Ha consisting of 4,814.96 Ha of nucleus estates; 2,000 Ha of Plasma farms; and 40 Ha for POM with a capacity of 30 tons of FFB/hour.
- Permit for Temporary Storage of Hazardous and Toxic Waste (for the scope of plantation/estate activities) based on a Statement Letter of Commitment to Fulfilment of Permit for Temporary Storage of Hazardous and Toxic Waste from the Investment and



One Stop Services Office of Kubu Raya Regency Number 570/473/DPMPTSP-E /2020 August 31, 2020. Available Minutes of Field Verification Issuance of Permits for Temporary Storage of Hazardous and Toxic Wastes Department of the Environment of Kubu Raya Regency No. 660.1/08/BA-TPSLB3/DLH-C dated 24 August 2020. There is an Operational Permit for Hazardous and Toxic Waste Management for Producers (OSS) issued on 31 August 2020.

- Permit for Temporary Storage of Hazardous and Toxic Waste (for the scope of PKS/POM activities) based on the Minutes of Field Verification of Issuance of Permit for Temporary Storage of Hazardous and Toxic Waste from the Kubu Raya Regency Environmental Service No. 660.1/10/BA-TPSLB3/DLH-C dated 20 May 2021. There is an Operational Permit for Hazardous and Toxic Waste Management for Producers (OSS) issued on 3 June 2021.
- Permit for Disposal of Wastewater based on a Letter from the Investment and One Stop Service Office of Kubu Raya Regency Number 503/008/DPMPTSP-E/IPLC/2017 dated 23 November 2017, the license validity period is 5 years. Referring to PP No. 22 of 2021 concerning the Implementation of Environmental Protection and Management, the permit is still valid. Permit volume of waste disposed of 308 m3/day.
- Permit for Domestic Wastewater Disposal based on Minutes of Verification of Permit for Domestic Wastewater Disposal (IPLCD) of the Department of Environment of Kubu Raya Regency No. 660.1/06/BA-IPLCD/DLH-C dated 28 April 2021. Operational Permit for Hazardous and Toxic Waste Management for Producers (OSS) issued on 3 June 2021 is available.
- Surface Water Extraction Permit based on Decree of the Minister of Public Works and Public Housing Number 516/KPTS/M/2021 dated 28 April 2021 concerning Granting of Water Resources Exploitation Permits to PT. CPC. 27,000 m3/month quota

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

- Law No. 07 of 1981 concerning Compulsory Employment Reporting in Companies
- Law No. 39 of 1999 concerning Human Rights
- Law No. 21 of 2000 concerning Trade Unions/Labour Unions
- Law No. 23 of 2002 concerning Child Protection
- Law No. 13 of 2003 concerning Manpower
- Law No. 24 of 2011 concerning BPJS
- Government Regulation no. 35 of 2021 concerning Specific Time Agreements, Power Experts, Working Time and Rest Time and Termination of Employment
- Government Regulation no. 36 of 2021 concerning Wages
- Government Regulation no. 37 of 2021 concerning Implementation of a Job Loss Guarantee Program
- The certification unit has implemented a structure and scale of employee wages based on years of service and work assessment of each employee.
- Company Regulation for the period 2021-2023 which has been ratified based on the Decree of the Head of the Manpower and Transmigration Office of Kubu Raya Regency No. 169 Year 2021 dated September 10, 2021 Company Regulation for the period 2021-2023 which has been ratified based on the Decree of the Head of the Manpower and Transmigration Office of Kubu Raya Regency No. 169 Year 2021 dated September 10, 2021
- The determination of wages at PT Bumi Pratama Khatulistiwa is based on the minimum wage in Kubu Raya Regency based on the Decree of the Governor of Kalimantan Barat No. 1387/NAKERTRAN/2022 on December 6, 2022. The Minimum Wage for Kubu Raya Regency in 2023 is Rp. 2,646,878.64.

#### **2.1.2**

The procedure of legal requirement which presented in document FRM 02/SOP 02/WIP-KB/0610 dated May 3, 2023. The procedure explains personnel who have a responsibility to update the regulation and law, identify and inventory, evaluation, and monitor Information of regulations from national, provincial, and district regulatory bodies and renewal any changes to prevailing laws and regulations, and monitoring of expired regulations/licenses.

The results of document Law Register verification, the company can show a list of laws and regulations for PT Bumi Pratama Khatulistiwa which explains the aspects, laws, and clauses of these regulations, namely:

- Plantation aspect, the latest updated on May 3, 2023 revision 6<sup>th</sup> consisting of 69 regulations
- Worker welfare aspect, the latest updated on May 3, 2023 revision 8<sup>th</sup>, consisting of 92 regulations
- OSH Aspect, the latest updated on May 3, 2023 revision 8<sup>th</sup>, consisting of 61 regulations
- Environmental aspect, the latest updated on May 3, 2023 revision 9<sup>th</sup>, consisting of 125 regulations
- Law Register for Contactor and Supplier for PT Bumi Pratama Khatulistiwa, the latest updated on May 3, 2023 revision 2<sup>nd</sup>,

consisting of 19 regulations.

The company also has personnel responsible for identifying legal requirements and ensuring compliance. Companies can also show a complete list of international, national, sub-national, and provincial laws that detail specific requirements for mill and plantation operations for each aspect such as employment, environment, legality, and Best Management Practices. All relevant sections of the law have been identified and linked to activities within the unit of certification. The company carries out an internal RSPO audit regularly every year with the last internal audit carried out on March 22, 2023, at which time the audit is carried out in conjunction with inspections related to compliance with the relevant regulations. In relation to third-party contracts, the certification unit has also ensured that there is an evaluation of legal compliance for all contracts with third parties carried out according to the principle of continuous improvement. This can be proven from the evidence of socialization to contractors as well as the application of standards and procedures for third parties who enter the scope of the company's area.

### 2.1.3

Procedure of legal boundary stakes monitoring, and maintenance is presented in document No. 001/SOP/GIS/2014 dated 1 July 2014. Procedure mentioned that maintenance was carried out by surveyor and Bina Mitra. Monitoring the boundaries of the HGU every 3 months or at least conducting every 1 year.

The company shows the HGU stake monitoring document. The last HGU stake monitoring was carried out for example in June 2023. The report on the inspection and maintenance of the boundary stakes has provided complete information regarding the number of stakes, the state of the stakes, the location of the stakes, the coordinates of the stakes and corrective actions as well as the target time for repairs if there are damaged or missing stakes. In the monitoring report, it is known that all HGU stakes are available.

Based on field observations to several samples of HGU stakes determined by the auditors, namely BPK Estate (Stakes No. T40A, T32A and T14B) and BPK POM (Stakes No. BPN 01 and BPN 02), it is concluded that all HGU and HGB stakes are in place according to their coordinates and are in good condition. Land boundaries with outsiders are clear, such as a large boundary road and trench that borders the HGU area. There is no indication of land use outside the HGU.

Status: Comply

## 2.2

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

### 2.2.1

The company already has a list of contractors included in the stakeholder list. The list of contractors includes all third parties working with PT Bumi Pratama Khatulistiwa such as hazardous waste transport contractors, FFB transport contractors, upkeep contractors, replanting contractors and others. The list of stakeholders informs the name of the agency, contact name, field of cooperation, address and contact number. The number of contractors working with the company is 11 contractors.

### 2.2.2 and 2.2.3

Based on verification to several work agreements, for example with FFB suppliers, such as through agreement No. 001/SPK-BPK Sei.Tempayan/PB-TBS/I/2023 dated 02 January 2023 with CV Ingat Budi and Agreement No. 001/SPK-BPK Sei.Tempayan/PB-TBS/I/2023 dated 02 January 2023 with PT Gusma Sukses Makmur, it is known that the work agreement has covered several things, among others

- Implementation of sustainability certification system.
- Personal protective equipment (PPE).
- Prohibition on hazardous material disposal.
- Manpower protection.
- Law pursuance and human rights.
- Disallowing child worker, forced and trafficked labour has been explained in the agreement.

Based on document verification of the salary slip and proof of *BPJS Ketenagakerjaan* for each local contractor employee are known that each worker has received wages in accordance with the government's regulation. In addition, the certification unit has also included its employees in the *BPJS Ketenagakerjaan* program.



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

Monitoring of law or regulation pursuance by contractors is presented in document of evaluation of contractor and form of evaluation and contractor. Sighted contractors' evaluation dated April – May 2023.

<b>Status: Comply</b>
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## 2.3

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

#### 2.3.1

The results of document reviews and interviews with management representatives found that FFB suppliers went directly to BPK POM for the period June 2022 – May 2023, as follows:

- Plasma Mekar Lestari, Associated Smallholder scheme, with the location of S. Ambawang Sub District, Kubu Raya Regency, Kalimantan Barat (X 109.445695; Y 0.021984), with a total of 1,000 smallholders, with a location permit Decree of the Head of the Pontianak Regency BPN Number 400/13-II/1998 concerning Issuance of Location Permits for Oil Palm Plasma Plantations of KUD Mekar Lestari.
- Plasma Tuah Jubata, Associated Smallholder scheme, with location S. Ambawang Sub District, Kubu Raya Regency, Kalimantan Barat (X 109.479476; Y 0.036549), with a total of 53 smallholders, with a location permit Decree of the Regent of Kubu Raya No. 174 2011 concerning the Granting of PT BPK Oil Palm Plantation Location Permits as community plasma land in Kuala Mandor B Village and Sungai Enau Village, Kuala Mandor B District, Kubu Raya Regency.

Based on this, it is known that The CH already has geolocation information records and other legal aspects.

#### 2.3.2

The results of document reviews and interviews with management representatives found that indirect FFB suppliers to BPK POM for the period June 2022 – May 2023, were as follows:

- CV Bintang Borneo
- CV Ingat Budi
- CV Mekar Jaya
- PT Gusma Sukses Makmur
- Koperasi Produsen Bintang Kapuas Jaya
- Koperasi Produsen Mega Bersama Jasa

As an example, the following is a record of the indirect FFB supplier legality documents, as follows:

- CV Ingat Budi
  - Location of smallholders who source FFB: Retok Village, Sungai Enau Village, and Kubu Padi Village, Kubu Raya Regency. The number of farmers who source FFB is 142 farmers, with coordinates X 109.44897 and Y 0.11155
  - Trade Business License (SIUP) with NIB 0273010223603 issued by OSS on December 30, 2020, issue date and the 2nd amendment on April 23, 2021, with the code KBLI (Indonesian Business Field Standard Classification) wholesale trading of fruit containing oil.
  - Micro and Small Business License number 503/01/EKB; trading business activities of FFB, rubber, and basic necessities; issued by the Head of the Kuala Mandor B Sub-District on 14 July 2020.
  - Farmers source FFB:
    - ✓ Property right certificate number 00960 issued by BPN. Location of Sungai Enau Village, Kuala Mandor B, Kubu Raya Regency, Kalimantan Barat, initial Fsn on 11 June 2018.
    - ✓ Certificate of Property Rights number 92 issued by BPN. Location of Sungai Enau Village, Kuala Mandor B, Kubu Raya Regency, Kalimantan Barat, initial Sml on 27 June 1992.
    - ✓ Land Certificate initial Dem issued by the head of the Rather Village, Sebangki District, Landak Regency.
- CV Mekar Jaya
  - Locations of smallholders who source FFB: Sui Village, Olak-Olak Village, and Arus Deras Village, Kubu Raya Regency.

There are 22 farmers who source FFB, with coordinates X 109.52645 and Y 0.22127.

- Trade Business License (SIUP) with NIB 9120414030394 issued by OSS on December 30, 2019, issue date and the 2nd amendment on June 15, 2020, with the code KBLI (Indonesian Business Field Standard Classification) large trading of oil-containing fruit.
- Farmers source FFB:
  - ✓ Property Rights Certificate number 1951 issued by BPN. Location of Sungai Ambangah Village, Sungai Raya, Kubu Raya Regency, Kalimantan Barat, initial SYTH on 23 December 2008.
  - ✓ Certificate of Property Rights number 588 issued by BPN. Location of Sungai Olak Olak Kubu Village, Kubu, Pontianak Regency, Kalimantan Barat, initial Srd on 27 June 1992.
  - ✓ Land Certificate initial Kp issued by the head of Sungai Asam Village, Sungai Raya District, Kubu Raya Regency.

Based on this, it is known that The CH already has geolocation information records and other legal aspects for indirect FFB suppliers.

**Status: Comply**

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

#### **3.1**

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

##### **3.1.1**

The CH has prepared a Management Plan in PT BPK's 5-year 2021-2025 Budget document which has been approved by PT BPK's EM. The budget includes projected FFB production, CPO and PK production, CPO and PK revenues, CPO and PK production costs, CPO and PK net income, total plantation costs, total factory costs, management costs, profit/loss, and projections for plasma smallholders. An example of a projection for 2023 is as follows:

- FFB Production: 10,100 MT
- CPO: 3,664,314 MT (20.04%)
- PK: 822,825 MT (4.50%)

##### **3.1.2**

The CH shows the projected annual replanting program for at least the next five years, listed in the 5 Year Budget document. For example, in 2022 it is planned to replant in Block 045, but until the time the audit is carried out it has not been carried out. The results of interviews with management explained that the results of the management review had not carried out replanting due to technical considerations for replanting for areas with historical Ganoderma.

The results of the document review revealed that for the replanting plan in the peat area a drainability assessment has been carried out which has been discussed in indicator 7.7.5.

##### **3.1.3**

Based on interviews with management representatives, it is known that one of the management reviews is carried out by the SDC (System development compliance) Department by conducting periodic checks. It has been shown that the 2022 SDC report was conducted on 18-26 August 2022 for BPK POM, and in 2023 it was carried out on 05-15 April 2023 for BPK Estate. Some of the things that were reviewed in the audit included heavy equipment performance productivity, FFB grading, warehousing, finance and wages, as well as OHS aspects including OHS for contractor workers, namely compliance with PPE contractors for FFB transport at the factory.

The company also presented the Management Review of PT BPK Estate in 2022 which was held on 16 February 2023. The main points of discussion included compliance with the use of PPE, socialization and training on OHS aspects for workers, evaluation of work accidents. Then also discussed the 5-year long term plan for CSR, fire prevention infrastructure, and housing; SDC findings; HCV management; LB3 management; Reducing the use of chemicals by making Gupon; housing environment conditions; as well as BMP on peat.

Based on this, it is known that The CH conducts management reviews within the planned time according to the scale and nature of the activities carried out.

**Status: Comply**

**3.2**

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

**3.2.1**

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

- The company no longer uses pesticides with the active ingredient paraquat.
- The company has implemented biological pest control in this case by using host plants and owls to reduce the use of pesticides, especially insecticides and rodenticides.
- Management and monitoring of fires in company border areas that benefit the community.
- The use of renewable fuels accordance to reduce the use of fossil fuels.
- Management and monitoring of factory effluent quality. Through WWTP pond management, wastewater quality testing, air quality management and monitoring, road maintenance, air quality testing, groundwater management and monitoring, groundwater quality testing and reporting to environmental services.
- Hazardous waste management. Storing hazardous waste in permitted hazardous waste warehouse, managing and monitoring hazardous waste.
- In managing Green House Gas (GHG), the company has implemented a zero burning policy, utilizing shells and fiber as renewable energy. Regular engine maintenance, regular emission quality tests and GHG calculations using the RSPO palm GHG calculator.
- Installing a sparring device to monitor the quality of waste water/POME discharged into river waters real time.

Based on opportunities for improvement in the previous assessment, the company indicated the appointment of casual daily workers to permanent workers. This information is available in indicator 6.6.2

**3.2.2**

Certification Unit already has an annual report document using the RSPO metric template format that has been provided to the auditor team at the time of the assessment. The summary in the report, for example, is as follows:

Name of RSPO Member	: Wilmar International Limited
RSPO Membership Number	: 2-0017-05-000-00
Name of Certified Unit	: PT Bumi Pratama Khatulistiwa
Name of Certification Body	: PT Mutu Agung Lestari
RSPO Palmtrace ID Number	: RSPO_PO1000004335
Number of Mills	: 1
Number of Estates	: 1
Production Area (ha) - Estate	: 4,418.16
Certified Area (ha) - Estate	: 4,842.95
High Conservation Value (HCV) Area (ha)	: 8.53
Peatlands - Planted (ha)	: 0
Peatlands – Unplanted (ha)	: 0
Freshwater Usage per PO produced tonne	: 182,309.74
Number of lost time injuries in BPK POM	: 0
Total hours worked in BPK POM	: 339,491.4
Lost Time Injury Frequency Rate (LTIFR) in BPK POM	: 0
Number of lost time injuries in Estate BPK	: 13
Total hours worked in Estate BPK	: 1594891
LTIFR in Estate BPK	: 8

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

Base on document verification, for The RSPO metric template known annual data 12 months period use (January to December 2022)

for schedule reporting annual data social and environmental, included monitoring data of water consumption, management dan monitoring HCV.

**Status: Comply**

### 3.3

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

##### 3.3.1

There is no change in procedure by the certified unit since the last assessment until this assessment (ASA-1.1) covered in "Agricultural Manual and Standard Operating Procedure for Oil Palm". The document contains about the procedure for pre-development survey, assessment and planting, nurseries, land clearing and preparation, legume cover crop, oil palm planting, upkeep, and maintenance of oil palm, harvesting of Fresh Fruit Bunches, plant protection, pest, and disease management, oil palm to oil palm replanting, EFB mulching, Quantitative Agro Management System (QAMS) and oil palm thinning technique.

Meanwhile, regarding the processing in the mill, the company has the document of processing job execution procedures (SOP of mills). The SOP consists of: Volume I (FFB Grading, Laboratory Sampling, and testing procedures, general and security, weighbridge, loading ramp, sterilization station, threshing station, pressing station, clarification station, kernel recovery station and boiler house). Volume II consists of power plant, water treatment plant, waste management, land application and solid waste, EFB utilization, workshops, electricity system, quality, storage and delivery of CPO and kernel, laboratory, procedure for producing CPO with low FFA.

Based on interviews with harvesters and management representatives, information was found that the work of picking loose FFB has been provided with special personnel from the upkeep section and fulfilment is gradual and continues to be carried out so that the proportion is proportional to the number of harvesters while pruning and gathering fronds is the responsibility of the harvester because it is fixed area for harvesters. Furthermore, based on job descriptions Harvesters have main duties and responsibilities, including:

#### 1. Main Duties

Harvest ripe FFB and collect loose fruit that is scattered starting from the tree, circle, and harvesting path (*pasar pikul*) to the nearest collecting point of FFB, arranging the cut fronds at the designated place".

#### 2. Responsibility

- Harvest ripe FFB
- Cut the stalks as tightly as possible (2 cm)
- Do not leave ripe fruit in the tree.
- Cut the fronds as close as possible to the tree.
- Harvesters are responsible for Pruning
- The fronds are arranged in the staking area
- No hanging fronds
- Don't leave fruit in the circle and path
- Loose fruits must be clean of trash, sand, stones and dirt

However, based on management's consideration, starting in May 2023, the work of Loose fruits picker will be separated from harvesters. PT. BPK has recruited a workforce of 113 people with a special job as pickers.

##### 3.3.2, 3.3.3

The CH already has a system that ensures the consistency of procedure implementation through internal audit activities, FFB grading, and field visits. For example:

- The 2022 SDC report which was conducted on 18 – 26 August 2022 for BPK POM, and in 2023 it was carried out on 05 – 15 April 2023 for BPK Estate. Some of the things that were reviewed in the audit included heavy equipment performance productivity, FFB grading, warehousing, finance and wages, as well as OHS aspects including OHS for contractor workers, namely compliance with PPE contractors for FFB transport at the factory.
- Grading of FFB done digitally by Kerani Harvest. Document number 3865 dated 05 July 2023 in Block 115 Division 1 found harvester number 1937 with the criteria of 74 ripe fruit, 0 underripe, 0 unripe, 0 abnormal, 0 empty bunches, loose fruit 0, 0 long stalk, 2 parthenocarp.
- The company also presented the Management Review of PT BPK Estate in 2022 which was held on 16 February 2023. The main

points of discussion included compliance with the use of PPE, socialization and training on OHS aspects for workers, evaluation of work accidents. Then also discussed the 5-year long term plan for CSR, fire prevention infrastructure, and housing; SDC findings; HCV management; LB3 management; Reducing the use of chemicals by making Barn Owl Box; housing environment conditions; as well as BMP on peat.

Status: Comply

### 3.4

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

#### 3.4.1

The certification unit has several documents related to social and environmental impact assessments which are carried out independently and in a participatory manner, involving affected stakeholders. The document covers the pre-construction activities, the operation stage and the post-operation stage. Some of the documents held by the certification unit include:

#### Environmental Impact Assessment (EIA)

The company already has an environmental impact analysis contained in several documents, including:

- The 2004 AMDAL document which has received approval from the Pontianak Regency AMDAL Commission and the Pontianak Regent in accordance with Letter No. 660.1/024.a/IV/DLHESDM-B dated April 8, 2004, with an area of 6,814.96 Ha consisting of 4,814.96 Ha for Core Company Estate and 2,000 Ha for Plasma plantations and 40 Ha for POM. The capacity of the mill which is the scope of the study is 30 tons of FFB/hour which is planned to be built outside the plantation area.
- Evidence that consultations with the parties have been carried out is an assessment by the AMDAL Assessment Commission, which was carried out on March 29, 2004, based on letter number 660.1/021/III/DLHESDM-B Pontianak district. In this activity, related stakeholders have been involved such as the plantation office, Bapeldalda, Forestry Service, BPN and representatives of local communities.
- The AMDAL document consists of the Main Report Document, Environmental Management Plan (RKL), Environmental Monitoring Plan (RPL) and Executive Summary. The ANDAL document has explained the business activity description plan or activities regarding the preparation/pre-construction stage, physical development/construction stage and non-plant physical development.

#### Social Impact Assessment (SIA)

Certification unit already conducted a Social Impact Assessment (SIA) 2015 for Palm Oil Plantations and Mills within the scope of Unit Certification of PT Bumi Pratama Khatulistiwa. The assessment process was carried out on 13 – 18 April 2015 in collaboration with PT. Remark Asia. Social impact assessment is included as part of Complementary to all environmental impact assessments. The assessment involved all parties affected by both internal and external stakeholders, including employees, workers union, village heads around the plantations and local NGOs. Participatory evidence with affected parties is shown in the form of attendance at FGD meetings and photos during interviews. The scope of the study includes the Management Unit of PT. BPK, The Four Villages around the plantation, and the Plasma Cooperative partner.

The report contains a description of the positive and negative socio-economic impacts of PT BPK's plantation and palm oil mill management activities. The data collection process was carried out by involving the community and workers as sources of information using interviews, focus group discussions and distributing questionnaires in the village. In the report, there is also a matrix on the Social Management Plan and Social Monitoring Plan and an Attachment to the Attendance List of participants in the data collection process. There are in the document attachments, evidence of participatory activities that are carried out completely and well documented. The stakeholders involved were 122 resource persons, 7 stakeholders, and held 5 FGD meetings and public consultations, as well as 8 informal meetings in the form of FGDs and in-depth interviews.

Community representatives who became resource persons in this assessment were the village head, village secretary, village apparatus, hamlet head, traditional leaders, village midwives, and farmers/fishermen/labourers. The types of data collected were primary and secondary data. Primary data collection for monitoring social impact management was obtained from informants as the affected party as well as local village officials who represented the community and as verifiers. The secondary data or indirect data collection is in the form of evidence, notes, archives or published historical reports as well as references in the form of AMDAL, HCV documents, local government literature, notes on CSR implementation and others. The aspects of the assessment are Economic Life (Natural Potential, Livelihoods, Local Economy, Food Security, Vulnerable Groups, Company Contribution, Plasma Plantation



Development) and Social and Cultural aspect. Meanwhile, another secondary data is obtained indirectly through intermediary media in the form of published evidence, records, archives, or historical reports. Retrieval of secondary data through literature studies. Secondary data is obtained from related units to document impact management as well as additional data from relevant affected parties. The reading material used is documentation of the implementation of impact management, internal company data, correspondence between the company and affected parties, and so on. Secondary data is also obtained from parties that are not directly related, such as sub-district data or news or pages from the media. Negative and positive issues were summarized during the assessment included management recommendations.

The certification unit has identified the HCV's contained in the High Conservation Value Assessment Report at PT. Bumi Pratama Khatulistiwa, Kubu Raya Regency, Kalimantan Barat Province. Identification is carried out in collaboration with PT. Remark Asia which took place in March – July 2015. The team for preparing the HCV assessment was led by Yokyok Hadiprakarsa who a member of the Assessor Licensing Scheme is or (RSPO Approved Assessor). The scope of the study is 7003.07 Ha consisting of estate and mill covering an area of 4854.52 Ha and plasma covering an area of 2148.55 Ha. Field data collection activities were carried out on April 14-18, 2015, with the scope of social data collection covering Sungai Malaya Village, Sungai Enau Village, Kubu Padi Village, and Mega Timur Village. The peer review of the report was conducted by Machmud Thohari on February 13, 2016.

### 3.4.2

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

The company already has an environmental impact analysis contained in several documents, including:

- The 2004 AMDAL document which has received approval from the Pontianak Regency AMDAL Commission and the Pontianak Regent in accordance with Letter No. 660.1/024.a/IV/DLHESDM-B dated April 8, 2004, with an area of 6,814.96 Ha consisting of 4,814.96 Ha for Core Company Estate and 2,000 Ha for Plasma plantations and 40 Ha for POM. The capacity of the mill which is the scope of the study is 30 tons of FFB/hour which is planned to be built outside the plantation area.
- Evidence that consultations with the parties have been carried out is an assessment by the AMDAL Assessment Commission, which was carried out on March 29, 2004, based on letter number 660.1/021/III/DLHESDM-B Pontianak district. In this activity, related stakeholders have been involved such as the plantation office, Bapeldalda, Forestry Service, BPN and representatives of local communities.
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The company has conducted SIA review and evaluation training in Kalimantan Barat Region on 24-26 May 2023 which was attended by all relevant departments (HR/PGA, SSL, EHS, DC, Plasma Manager).

The company has shown the results of the SIA PT review. BPK for the 2023-2025 period involving all relevant departments based on the results of the involvement of relevant stakeholders (village officials: village head, village secretary, BPD; community leaders; youth leaders; traditional leaders; religious leaders; plasma/farmer group administrators; plantation and PKS employees and PKK women) covering Kuala Mandor B village, Sungai Malaya village, Mega Timur village, Sungai Enau village in June 2023.

Review of the Social Management Plan and Social Monitoring Plan related to external issues including:

- Dust handling
- Handling flood issues
- CSR realization

- Land claims
- Arable land
- plasma koperasi Mekar Lestari SHM certification
- The issue of TBS theft

### 3.4.3

#### Environmental Impact Assessment (EIA)

The environmental impact management & monitoring plan (AMDAL 2004) includes:

- Social unrest, managed by providing social assistance.
- Flood, managed by maintaining vegetation on the riverbank.
- Habitat for flora and fauna, managed by creating a conservation area.
- Land fires, managed by land clearing without burning.
- Increased community income, managed by providing business opportunities.
- Decreased river water quality, managed by doing housekeeping and building WWTPs.
- Community health, managed by promoting clean living and temporarily stopping factory operations if there are health problems.

#### Social Impact Assessment (SIA)

The company has conducted SIA review and evaluation training in the Kalimantan Barat Estate Region on 24-26 May 2023 which was attended by all relevant departments (HR/PGA, SSL, EHS, DC, Plasma Manager). The company has shown the results of the SIA review of PT. BPK for the 2023-2025 period involving all relevant departments based on the results of involving relevant stakeholders (village officials: village head, village secretary, BPD; community leaders; youth leaders; traditional leaders; religious leaders; plasma administrators/farmer groups; plantation and PKS employees and mothers -PKK women) covering Kuala Mandor B village, Sungai Malaya village, Mega Timur village, Sungai Enau village in June 2023.

RKS and RPS review related to external issues, including:

- Handling dust
- Handling flood issues
- Realization of CSR
- Claim land
- Arable land
- Certification of SHM plasma cooperative Mekar Lestari
- The issue of fruit theft.

Status: Comply

### 3.5

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

#### 3.5.1

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

- SOP for the Recruitment of Permanent Workers (PKWTT). SOP regarding Recruitment of employees with Document Number 023/DIR-KP/IV/2015 effective April 1, 2015, which was approved by the CEO. The procedure explains that recruitment information is carried out openly, recruitment is free of charge, and there is no retention of workers' personal documents.
- NPDE policy updated on November 15, 2019, in part (iii) ensuring ethical recruitment so that workers are not charged at any stage during the recruitment process and there is no detention of passports/identity documents workers can still voluntarily hand over their passports or identity documents for holding by management for security purposes. In such cases, the document must be returned to the worker upon request. There must be evidence of due diligence in applying this policy to all contract workers and suppliers.
- NDPE Policy section (vi) commitment to best practice regarding fair working conditions, including payment of wages that meet or are above applicable legal requirements, taking into account production targets and reasonable working hours.

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

The system of career paths and work performance evaluation is regulated in the Directors' Decree document, with Number 043/CEO-WIP/SKD-VI/2014 effective date June 1, 2014, which was approved by the CEO. The document describes the procedures for the stages of performance appraisal and employee career paths (promotion, demotion, and transfer).

### **Training System**

Procedure for Training/Training document No. SOP 38/HRD/(2)/0822 revision 02 dated August 1, 2022, approved by General Manager,

In addition, the CLA of 2022-2024 also explains the human resource management system, such as:

- Acceptance of workers
- Probationary period and working period
- Termination of employment
- And others.

### **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 (mill and estate).

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

#### **Recruitment and Appointment as permanent worker**

- Letter of appointment of permanent worker No. 153/BPK-HRR/SK/V/2023 dated May 25, 2023 with initial I.S. Recruitment documentation also has been shown such as job application letters, results of health checks, ID cards, diplomas, Family card and others.
- Letter of appointment of permanent worker No. 091/BPK-HRR/SK/IV/2023 dated March 30, 2023, with initial ANT. Recruitment documentation also has been shown such as job application letters, results of health checks, ID cards, diplomas, Family card and others.

#### **Promotion**

- Promotion Letter No. 041/BPK-HRR/SK/IV/2023 dated April 1, 2023, worker initial ALF casual daily worker from to regular daily employees/2A for the type of work Manuring.
- Promotion Letter No. 052/BPK-HRR/SK/IV/2023 dated April 1, 2023, worker initial A casual daily worker from to regular daily employees/2A for the type of work Manuring.

#### **Work Termination**

A joint agreement letter between the management represented by the Estate Manager and the harvesters on behalf of MS on December 31, 2022, has agreed to terminate the employment relationship because he has been absent for 5 consecutive days and the company also shows termination payments in accordance with applicable regulations which has been signed by both parties.

#### **Pension**

- Pension termination on behalf of TLB with Employee Code BX/BPK/1002/120 pension date January 1, 2023, at age 57 and get pension right on date March 6, 2023.
- Pension termination on behalf of MSW with Employee Code BX/BPK/0200/68 pension date December 15, 2022, at age 57 and get pension right on date March 6, 2023.

The results of interviews with workers and labour union revealed that labour 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. Furthermore, Based on a review of layoff documents and interviews with unions, the company has never carried out a unilateral layoff and has respected the rights of these workers. PT BPK has been carries out due processes prior terminating any workers, in accordance to workers' rights set out based on the company's policy and legal regulations.

<b>Status: Comply</b>	
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### 3.6 An Occupational Health and Safety (H&S) plan is documented, effectively communicated and implemented.

#### 3.6.1 & 3.6.2

##### Hazard Identification Risk Assessment and Control

HIRAC describes Activities, identification of potential hazards (source/event, impact), existing controls, initial risk analysis (level of likelihood, severity, level of risk). The identified activities cover all operational activities at the estate and mill, such as manual maintenance, chemical application, fertilizing, harvesting, transporting FFB, sorting FFB, and processing it into CPO and Kernel. Identification has also been carried out for supporting activities such as pest and disease monitoring, BOB (Barn Owl Box) monitoring, HCV monitoring, Tower of Fire, etc. The CH has also evaluated the Identification of Environmental Impact and Material Risk and OHS Analysis documents taking into account work accidents, the addition of new types of work or the use of new equipment/technology.

##### OHS Program

OHS programs that have been implemented by The CH include monthly OHS Committee meetings, regular OHS Committee reports to the Manpower Office, safety inspections, periodic health checks, recording of work accidents, first aid inspections, PPE inspections, OHS training, emergency response simulations, socialization of SOPs, material handling toxic and dangerous, fire hazards, use of fire extinguishers, MSDS and symbols of hazardous materials and others.

##### The realization of the OHS plan.

- Medical checkup  
There are results of CHE examinations for 127 workers and Audiometry for 19 workers which were carried out at the UPT Occupational Health Laboratory of the Office of Manpower and Transmigration, Province of Kalimantan Barat. CHE's initial inspection on 28 – 30 November 2022 included 50 sprayers and supervision; 41 fertilizers and supervision; warehouse clerk; as well as other workers associated with chemicals. From the results of the examination there were 34 workers with "Mild" (Abnormal) CHE levels consisting of 16 sprayers, 10 fertilizers, and several other workers. The 34 workers were transferred from work related to pesticides and then underwent a re-examination on 21 February and 03 March 2023 for workers with abnormal CHE, and it was found that there were 5 fertilizers and 6 sprayers with abnormal results. Then a re-examination was carried out on June 19, 2023, for workers who were still not normal. It is known that the results of the last cholinesterase examination showed that all workers were normal.
- Health Examination for all workers  
Health Examination for all workers is carried out in stages. From January to March 2023, health checks have been carried out for 70 non-high-risk workers, including cholesterol, uric acid and blood sugar checks. Inspection of all workers will be carried out every month and planned for all workers.
- OHS inspection:  
Including, among other things, a vibration inspection at the BPK Mill on December 6, 2022, with results below the threshold. Noise inspection at the BPK mill on September 5, 2022, with results including boiler and power house areas above 85 dB, periodic inspection of PPE equipment, periodic inspection of fire extinguishers, periodic first aid kits including first aid bags. There are daily, weekly and monthly checks. The official in charge is the secretary of the K3 Committee.
- OHS Training and Outreach:  
Routine briefings are carried out every morning. The themes discussed included the obligation to use PPE, safe working methods, handling work accidents, basic first aid training to outreach about the Covid-19 pandemic.

Work accident monitoring: During the period from January to June 2023 there were no work accidents in the BPK Mill area. Meanwhile at the BPK Estate there was a minor work accident with the help of medical aid.

Status: Comply

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

#### 3.7.1

The company showed the Training Program for each unit in 2022/2023 that cover all aspects of the P&C RSPO. Based on interview with management, known that the training also covers parties who need training such as staff, workers, smallholder and contractors. As for sustainability and HR department are responsible for the development of the training program scheduling and implementation of training. The training program document informs type of training, plan / timetable and attendance. The 2022/2023 training programs such as:

- Harvesting training

- Census training
- OHS training
- Peat Management training
- Firefighting emergency response training
- First aid training
- LSU training
- And others.

Based on opportunities for improvement in previous assessments, the company shows a list of OHS training licenses owned.

### 3.7.2

The company already has training records, such as:

- OHS training on 20 December 2022 was attended by 60 participants
- First aid training on 25 March 2023 was attended by 29 participants
- Peat Management training on 18 October 2022 attended by 35 participants
- Refreshment Manuring training on February 8, 2023 attended by 20 participants
- Refreshment calibration of spray equipment, use of herbicides and use of PPE on March 20, 2023 attended by 19 participants.
- Etc.

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

### 3.7.3

The unit of certification showed socialization about the supply chain to employees which was last conduct on 23 June 2023. The minutes explained the procedures for managing certified and non-certified products including the responsibilities for each of the personnel who handle products.

The results of interviews with Head of Administration, weighbridge operator in POM and FFB administration in Estate showed that workers have already known the duties and responsibilities of each in the implementation of SCCS in accordance with the procedure and have been able to explain well about the management of certified and uncertified products, especially regarding the origin of the FFB source.

**Status: Comply**

## 3.8

### Supply Chain Requirements for Mills

#### 3.8.1 and 3.8.2

Based on document verification, the Mill implements the MB Module, which is received both FFB from certified and uncertified sources. Verification of Mass Balance record, the Mill has been recorded well the separation of FFB and products (CPO and PK) from certified and uncertified sources.

#### 3.8.3

Estimated certified product recorded in the last assessment report. The estimates of certified production for the next license period describe at ASA-1.1 report (basic info 1.8.3), in reasonable amount taking into account the last year's production. The data are shown in the following table:

Products	Last Year Projected Certified Volume (18 Oct 2022 – 17 Oct 2023) (MT)	Actual (June 2022 - May 2023) (MT)
FFB Certified (MT)	80,000	75,258.23

CSPO (MT)	16,000	14,276.12
CSPK (MT)	3,600	3,266.92

### 3.8.4

The Mill has registered as RSPO member under Wilmar International Limited (No. 2-0017-05-000-00) and has been registered in IT platform palm trace RSPO <https://palmtrace.rspo.org/web/rspo/member-directory> which information as follows:

- Member Name: Bumi Pratama Khatulistiwa
- License ID: CB138575
- Core Product: Palm Oil
- Member ID: RSPO\_PO1000004335
- Type of Business: Oil Mill

### 3.8.5

The Mill has had procedures related supply chain, such as SOP of RSPO Supply Chain Model of Mass Balance (No. SOP/BPK-ADM/007/ 0521, dated May 2021). These procedures have referred to the latest RSPO Supply Chain System. The procedure has covered all aspects in SCCS MB model, such as receiving and recording that identify the traceability of RSPO certified and uncertified source and products, FFB processing, the announcement in RSPO Palmtrace, key persons such as security, weight bridge clerk, dispatch/kernel officer, production clerk, Administration Head, as well as the training.

Based on the interviews with weighbridge officers and security, the two personnel have been able to explain well about the management of certified and uncertified products, especially regarding the origin of the FFB source.

### 3.8.6

The procedure for internal audit for SCCS mentioned in the procedure of Internal Audit (No. SOP/BPK-EHS/018/0612). Based on that procedure internal audit carry out minimum one times a year. Based on document review, the company show the record evidence regarding internal audit of RSPO SCCS that conducted on 14-15 March 2023. Based on result of internal audit, there is one non conformity SSCS indicators and has been closed in April 2023 and complied with RSPO Supply Chain requirements for mills and the RSPO Rules on Market Communications and Claims.

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

### 3.8.7

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

Month	FFB (ton)		Total
	Certified	Non-Certified	
June 2022	6,852.79	8,417.45	15,270.24
July 2022	6,396.98	9,146.96	15,543.94
August 2022	8,179.64	8,966.21	17,145.85
Sept 2022	7,640.84	7,323.68	14,964.52
Oct 2022	6,336.45	5,497.86	11,834.31
Nov 2022	6,583.08	4,758.72	11,341.80
Dec 2022	5,759.71	3,697.92	9,457.63
Jan 2023	5,097.47	2,826.95	7,924.42
Feb 2023	4,357.40	2,125.08	6,482.48
Mar 2023	5,416.65	2,375.16	7,791.81
Apr 2023	4,112.56	2,231.51	6,344.07

May 2023	8,524.66	5,093.67	13,618.33
<b>Total</b>	<b>75,258.23</b>	<b>62,461.16</b>	<b>137,719.39</b>

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

Products	Last Year Projected Certified Volume (18 Oct 2022 – 17 Oct 2023) (MT)	Actual (June 2022 - May 2023) (MT)
FFB Certified (MT)	80,000	75,258.23
CSPO (MT)	16,000	14,276.12
CSPK (MT)	3,600	3,266.92

According to the data during the license period (12 months), there still not any overproduction yet.

Regarding mechanism in place for handling of non-conforming FFB and/or documents has been described in the SCCS Procedure were if there are FFB uncertified claimed as FFB certified and has been process, the mill will move FFB from certified columns to uncertified columns and automatically will affect bookkeeping stock RSPO and non RSPO product stock and if there is wrong input during FFB reporting the logistic team will coordinate with estate to revise the reports.

### 3.8.8

The mill has product information provided in such as document of weighbridge ticket, delivery order and other invoices, as example at invoices of PK certified delivery on 21 June 2023. The information provided on invoices are:

- The name and address of the buyer (PT Wilmar Cahaya Indonesia – Pontianak Utara);
- The name and address of the seller (PT Bumi Pratama Khatulistiwa – Kubu Raya District)
- The loading or shipment / delivery date (8 March 2023);
- A description of the product supply chain model (Mass Balance)
- The date on which the documents were issued (30 May 2023);
- The quantity of the products delivered (4.08 ton);
- Any related transport documentation (transport by PT Adi Daya Express);
- A unique identification number (BX11112342);
- RSPO certificate number (Mutu-RSPO/100);
- etc.

### 3.8.9, 3.8.10 and 3.8.11

Based on documents verifications and interview with management it was known there is no contractor used for the processing or physical handling of RSPO certified oil palm products. CPO and PK transporting are under responsibility the buyer.

### 3.8.12

The company has had the up-to-date record and report that are kept in mill office, complete, accurate and up-to-date. All the record can be accessed by the auditor, such as record of certified product shipping, sales contract, delivery order/invoice, production report and product sales. Based on document verification on procedure of document control (No. SOP44/WIP-KB/(0)/2011 dated January 2011), retention time for all records and report, including regarding to supply chain are kept for 5 years.

For instance, record of all certified palm oil/palm kernel oil volumes purchased (input) and claimed (output) for period of 12-months before audit (June 2022 – May 2023):

### CSPO

Month	CPO (ton)		Total
	Certified	Non-Certified	
Opening Stock	321.03	-	321.03

June 2022 - May 2023	13,955.09	11,630.24	25,585.33
<b>Total</b>	<b>14,276.12</b>	<b>11,630.24</b>	<b>25,906.36</b>

Month	CSPO Despatch (ton)			Total
	RSPO	Other Scheme	Non-Certified	
June 2022 - May 2023	13,793.87	-	-	13,793.87

**CSPK**

Month	PK (ton)		Total
	Certified	Non-Certified	
Opening Stock	106.36	-	106.36
June 2022 - May 2023	3,160.55	2,631.22	5,791.77
<b>Total</b>	<b>3,266.92</b>	<b>2,631.22</b>	<b>5,898.13</b>

Month	CSPK Despatch (ton)			Total
	RSPO	Other Scheme	Non-Certified	
June 2022 - May 2023	3,214.82	-	-	3,214.82

**3.8.13 and 3.8.14**

The conversion rate of production of CPO (OER) and PK (KER) were based on actual daily, monthly and yearly production. The extraction rate follows the actual data for a 12-month period for June 2022 until May 2023 i.e OER 18.58% and KER 4.21%. Periodically update of extraction is actual extraction.

**3.8.15**

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

**3.8.16**

RSPO IT Platform member registration number for BPK Palm Oil Mill is RSPO\_ PO1000004335. The Mill carry out shipping announcement in the RSPO IT platform when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three (3) months after dispatch. For example:

- Certified CPO sold to PT Multimas Nabati Asahan dated 18 October 2022 for 446.14 MT and transaction creates in IT Palm Trace dated 18 October 2022.
- Certified CPO sold to PT Wilmar Cahaya Indonesia - Pontianak dated 28 February 2023 for 580.24 MT and transaction creates in IT Palm Trace dated 23 March 2023.
- Certified PK sold to PT Wilmar Cahaya Indonesia - Pontianak dated 31 March 2023 for 204.53 MT and transaction creates in IT Palm Trace dated 17 April 2023.

**Removing Stock**

Unit of certification sold all CSPO and CSPK as RSPO product.

**3.8.17**

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

**Status: Comply**
**PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS**
**4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.**

**4.1.1**  
The company has had a Human Rights Policy signed by Group Plantation Head and Group CSR Head, updated January 2018 and is included in the Wilmar Policy (June 2019) at point 3 that it will not do exploitation of fellow humans and local communities. The company also has a Grievance Procedure for The Implementation of Wilmar's No Deforestation, No Peat, No Exploitation (NDPE) Policy updated November 2019. At point 4.2 in the document, explained about the Protection of Human Rights Defenders, Whistleblowers, Complainants and Community Spokespersons.

The company has conducted socialization related to company policies. For example, the company shows documentation of socialization related company including Human Rights and others on February 16, 2023, attended by 65 participants.

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

**4.1.2**  
The results of interviews with stakeholders such as government agencies, representatives of surrounding villages (Sungai Enau), labour 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.

Based on interviews with union worker, spray and fertilization workers it was found that the company not to intimidated the workers that asking or demand for their right.

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

**4.2.1**  
The certification unit has a Complaint SOP with SOP document number SOP 60/WIP-KB/(01)/0905. The procedure is a reference in receiving and resolving complaints from external and internal parties. Meanwhile, the personnel responsible for receiving and documenting complaints from the parties are Corporate Affairs. Complaints that exist will be reviewed and consulted with the parties for resolution. It was further explained that each reporter's identity (anonymity/ whistleblower) is kept/ confidential, the certification unit has installed a bulletin board at the front of the office area in each work unit, for example in the plantation and factory offices. The main points of the notification are the address of the complaint (phone number & email) and the guarantee of confidentiality and protection for the complainant.

If the complaint is not resolved by deliberation and consensus, then the certification unit and the party submitting the complaint want a resolution through the Mediation Forum. The Mediation Forum meeting must take place at the location of the third party or other agreed place of neutrality then the parties can take it to the RSPO Complaints System.

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

**4.2.2**  
The certification unit has established a system for handling complaints and complaints for all affected parties which is documented in the Grievance Handling and Complaints Procedure with document number SOP 60/WIP-KB/(01)/0915 revision 02 dated January 6, 2021. There are additional provisions on point 13 regarding the implementation of communication and consultation procedures to stakeholders, where the socialization of this procedure is carried out by displaying the procedure in writing or by showing pictures so that it can be understood by stakeholders who cannot read and write. The procedure states that all complaints must be registered in



the Complaint Form (Attachment 1 of the SOP) in clear and easy to understand language. All complaint forms will be collected and registered monthly into the Grievance Register Book (Appendix 2 of the SOP). Certification unit will respond to each complaint within 14 days from the date the complaint request was received.

The procedure has been socialized to estate and mill workers as well as to the surrounding community on February 16, 2023, attended by 65 participants. Certification units can show the minutes and attendance lists for the socialization.

#### 4.2.3

Based on document verification of internal and external complaint book for 2022 - 2023, it is known that there were complaints from the KUD Mekar Lestari on March 18, 2023, who complained about demanding the price of FFB according to the official plantation price and convention. The certification unit in this case responds to these complaints by holding a meeting on March 18, 2023, and the results of the meeting are listed in the minutes and the FFB price is in accordance with the official plantation price. The follow-up to the certification unit was completed on March 18, 2023, the certification unit in this case provided information to representatives of the community. The certification unit can show documentation of the delivery of assistance to the surrounding community.

#### 4.2.4

Company showed procedure in Grievance Handling and Complaints Procedure with document number SOP 60/WIP-KB/(01)/0915 revision 02 dated January 6, 2021. The procedures explained activities of handling grievances related to workers' and all stakeholder's grievances through each worker's supervisor, grievance logbook, suggestion box, gender committee, labour union, company's hotline number and etc. In the procedure of complaint mechanism has been set that the complaint resolution is address in deliberation in advance. If the complaint is not resolved by deliberation and consensus, then the certification unit and the party submitting the complaint want a resolution through the Mediation Forum. The Mediation Forum meeting must take place at the location of the third party or other agreed place of neutrality then the parties can take it to the RSPO Complaints System. In addition, it was also explained that the response time period is 14 days. The officer responsible for responding to stakeholders is the Manager/Assistant/Administration Head/Public Relations.

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

**Status: Comply**

### 4.3

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

#### 4.3.1

The social management and monitoring plan is implemented, monitored and updated periodically in a participatory manner. In general, the social management plan of BPK POM is work programs from companies that are grouped into the social community, strengthening stakeholders, social culture and employment. The planned program is derived from the results of the Focus Group Discussions, socialization and review of SIA Programs conducted on September 25, 2021, to surrounding villages which was attended by 34 people. Activities that have been carried out in villages around company and the workers/employees within the company (already explain in 3.4.2).

The company has also carried out an SIA socialization and review on September 25, 2021, which was attended by surrounding villages with the aim of monitoring and updating the SIA management program in a participatory manner with relevant stakeholders. The results of the meeting then resulted in the SIA Management and Monitoring Program for 2021-2022 where several programs that previously existed, were still being continued for the next period. This activity also aims to accommodate the aspirations of the surrounding community for the needs they expect from the company such as job opportunities, road repairs and other facilities.

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- Wash canals/ditch for flood control in S. Rasau, Parit Pak Perak, Parit Tenaga Baru Sungai Enau Village, Kec. Kuala Foreman B, Kab. Kubu Raya
- Road repairs in Kencana Hamlet, Parit Suka Maju, Parit Banjar, Pak Kasim Street, Sungai Malaya Village, Kec. Ambawang River
- Provision of employment opportunities (company workers) and business (contractors)
- Donations to celebrate religious ceremonies.
- Donations for repairs to houses of worship.

- Donations for regional security activities

**Status: Comply**

#### 4.4

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

##### 4.4.1

PT Bumi Pratama Khatulistiwa formerly named PT Bumi Khatulistiwa (PT BKU) which was established in 1990 based on Notarial Deed No. 5 dated 1 August 1990 as Hybrid coconut and Pineapple Plantation. Then in 1992 there was a change in the company's name to PT Bumi Pratama Khatulistiwa in accordance with the Notarial Deed No. 37 dated 11 January 1992 regarding the Change of Company Name to PT Bumi Pratama Khatulistiwa which takes over by Wilmar International Limited in 1999 (19 March 1999) based on *Surat Persetujuan Menteri Negara Investasi / Kepala Badan Koordinasi Penanaman Modal tentang perubahan status perusahaan* No. 25/V/PMA/1999. From the total land title covering 4,814.96 the company has been compensated area with the total area 2,611.030 Ha based on SKT or 2,328.730 ha based on actual measurement. The land compensation involved 14 community groups with a total person is 960 people and was carried out during the period 1998 – 2006.

PT BPK has managed totalling area for about **4,842.95 Ha** as scope of certification. The corporate area originates from state land with other usage area status, in which there are several community's land. The acquisition process began with obtaining a location permit from head of land agency of Pontianak District in 1996. The next process is land acquisition from community's area by providing compensation since 1998. The Document of land use right (HGU) on an area of **4,842.95 Ha** can be shown by PT BPK, consisting of:

- HGU for an area of **4,814.96 Ha** based on Minister of Agrarian/Head of BPN Decree No. 18/HGU/BPN/96 dated 31 May 1996, with 30-year concession valid until 21 July 2026 (HGU Certificate No. 59 of 1996 dated 29 July 1996).
- There are 3 HGB certificate with total **27.99 Ha**, in following detail:
  - HGB certificate No. 00078 dated 2 July 2020 (with a validity period of 30 years, until 11 March 2050) covering an area of **4.427 Ha**.
  - HGB certificate No. 00079 dated 3 July 2020 (with a validity period of 30 years, until 11 March 2050) covering an area of **106,700 m<sup>2</sup> or 10.67 Ha**.
  - HGB certificate No. 00080 dated 3 July 2020 (with a validity period of 30 years, until 11 March 2050) covering an area of **128,900 m<sup>2</sup> or 12.89 Ha**.

##### 4.4.2 and 4.4.5

The company already has an FPIC SOP as stated in the documents:

- SOP Free Prior & Informed Consent /FPIC dated SOP 06/WIP-KB (0)/2011 dated January 2011 with the aims as a guide to the process of obtaining FPIC from local communities or indigenous communities as owners of land to be converted into oil palm plantations.
- SOP for the Technical Guidelines for Land / Land Acquisition Document No SOP01 / WIP-KB / (1) / 1215 on the effective date of January 1, 2015, legalized by GM PT BPK. In part E it is explained that the principle of carrying out land acquisition is in accordance with the principles of RSPO, HCVF and FPIC, namely land acquisition is carried out based on a decision that was born from a deliberation process to reach a consensus for investment interests freely without pressure (free) and the community has the right to agree or refuse (consent).

The CH has shown that land acquisition has been done through negotiation. PT BPK had compensated the community with a total area with the total area of 2,611.030 Ha or based on SKT or 2,328.730 ha based on actual measurement. The land compensation involved 14 community groups with a total person is 960 people and was carried out during the period 1998 – 2006. Based on the results of interviews with the previous landowners obtained information if the compensation process has been held with transparency regarding the mutual agreement. The compensation process involved all community witnessed also by the Village Head, Sub-district head, and other relevant parties. Records of the land compensation process consist of documents of land identification and inventory, land location maps, statements of the release of land rights by the owner, Receipts of Payment, Minutes of compensation/Compensation, and witnesses. For example, land acquisition for an area covering 309 Ha which is owned by farmers groups of Mekar Jaya, Parit Jaya Hamlet, the village of Sungai Enau, Subs District of Sungai Ambawang, can be evidenced with:

- Declaration of Agreement PT BPK with STR (Initial) and JPR (initial) which represents the community of farmers group Mekar Jaya with numbers of members are 148 persons (JPR (initial) = 19 + 48, STR (Initial) – 49 + 21; HMD (Initial) 11) on 18 February



1998 who claims/owns / controls area inside the land title of PT BPK covering 309 Ha. That agreement described if PT BPK agreed to compensate to farmers' group, and the farmer's group agreed to deliver their land to the company as well as payment methods. The agreement was signed by both parties and witnessed by the village head, subdistrict police head, subdistrict military head, and subdistrict Head of Sei Ambawang

- Besides declaration of agreements the company can present other documents for example land measurements documents, and administrative completeness check documents. All documents above are also signed by relevant authority.

#### 4.4.3

PT BPK are a long-established company that has been started operationally in the early period of 1990, were on that's period, the FPIC concept not yet available. Currently there is no new land acquisition, and the entire compensation process was completed in 2006. Based on documents verifications, the compensation process involved all community witnessed also by the Village Head, Sub-district head, and other relevant parties. Records of the land compensation process consist of documents of land identification and inventory, land location maps, statements of the release of land rights by the owner, Receipts of Payment, Minutes of compensation/Compensation, and witnesses by relevant parties.

The company can show a map showing legal rights in the form of a HGU boundary map with a scale of 1:50,000 and 1:40,000 contained in the HGU certificate issued by the Land Office that developed through participatory mapping. Based on public consultation with village representatives from Sungai Enau Village and Sungai Malaya Village, it is recognized that they know the legal boundaries owned by PT BPK.

Based on field observations to several samples of HGU stakes determined by the auditors, namely BPK Estate (Stakes No. T40A, T32A and T14B) and BPK POM (Stakes No. BPN 01 and BPN 02), it is concluded that all HGU and HGB stakes are in place according to their coordinates and are in good condition. Land boundaries with outsiders are clear, such as a large boundary road and trench that borders the HGU area. There is no indication of land use outside the HGU.

#### 4.4.4

As explained in indicator 4.4.2, it was informed that PT BPK had compensated the community with a total area with the total area of 2,611.030 Ha or based on SKT or 2,328.730 ha based on actual measurement. The land compensation involved 14 community groups with a total person is 960 people and was carried out during the period 1998 – 2006. Based on document verifications it was known if the compensation process involved all community witnessed also by the Village Head, Sub-district head, and other relevant parties. Records of the land compensation process consist of documents of land identification and inventory, land location maps, statements of the release of land rights by the owner, Receipts of Payment, Minutes of compensation/Compensation, and witnesses by relevant parties.

In addition, as part of the company's development, the company has also developed palm oil plantations for the community through a smallholder scheme with a total area of 2145.59 ha consisting of two smallholders' cooperative schemes (Mekar Lestari Cooperative and Tua Jubata Cooperative). Currently, the management of the Mekar Lestari cooperative has been carried out independently and the Tua Jubata cooperative is still under company management. The development of the smallholder scheme is one of the company's efforts so that the community around the company can benefit from the company's existence. In addition, to facilitate community access, the company has opened and built access roads to the community, where there are 6 access roads that cross the company connecting the surrounding villages/hamlets. With the existence of this access road, it is easier to access from villages / hamlets that were previously via the river, now can pass through the company's access road. This information has been verified through public consultation with village head and government agency as well as workers who still live around the company.

As time goes, there were demands from the community regarding the construction of a smallholder scheme and finally the company developed a smallholder scheme in the name of Tuah Jubata Cooperation. For people who refuse to develop a smallholder scheme, the company compassionate with a total land area of 1756.01 Ha in 2012. During an audit, the company presented a letter of agreement to settle the claim between the Sungai Enau Village Farmers Group and PT Bumi Pratama Khatulistiwa on 19 January 2012. STR (initial) is a representative of the 73 members of the farmer group and the head of the farmer group. In the letter of agreement, both parties agreed on the compensation for a land area of 168 ha and after payment of compensation, the community did not demand to develop an oil palm plantation.

#### 4.4.6

Even though PT BPK has obtained a land title in 1996 with a validity period until 2026, there are community groups/farmer groups in

Sungai Enau Village who consider that the land title of PT BPK is valid until 2021 or 25 years as promised at the time of the initial preparation/ compensation. There have been several incidents related to this (described in Criteria 4.8). The results of the auditor's verification revealed that the validity period of the land title of PT BPK is 30 years as stated in the HGU decree and HGU certificate and strengthened by the results of public consultations with the Land Agency which explains that administratively the land title of PT BPK is valid for 30 years. Based on the results of public consultations with the village head of Sungai Enau, the claim was based on the initial opening they were promised that the land title was 25 years, however, at the time of mediation or meetings with the local government they could not prove it.

**Status: Comply**

#### 4.5

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

##### 4.5.1; 4.5.2; 4.5.3, 4.5.4; 4.5.5, 4.5.6; 4.5.7; 4.5.8

Based on the document review (area statement), filed observation, interviews with the village head and Plantation Agency of Kubu Raya, it was found that there were no new land acquisitions/new planting after January 2010.

**Status: Comply**

#### 4.6

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

##### 4.6.1 and 4.6.2

Procedure of land acquisition available in the documents:

- SOP Free Prior & Informed Consent /FPIC dated SOP 06/WIP-KB (0)/2011 dated January 2011 with the aims as a guide to the process of obtaining FPIC from local communities or indigenous communities as owners of land to be converted into oil palm plantations.
- SOP for the Technical Guidelines for Land / Land Acquisition Document No SOP01 / WIP-KB / (1) / 1215 on the effective date of January 1, 2015, legalized by GM PT BPK. In part E it is explained that the principle of carrying out land acquisition is in accordance with the principles of RSPO, HCVF and FPIC, namely land acquisition is carried out based on a decision that was born from a deliberation process to reach a consensus for investment interests freely without pressure (free) and the community has the right to agree or refuse (consent).

Based on public consultation with village representatives from Sungai Enau Village and Sungai Malaya Village known that they know about the procedure through the socialization given and they agree with the procedure.

##### 4.6.3

PT BPK already has cooperation in the development of plasma plantations namely Tuah Jubata Cooperative. Based on the data from the farmers in the Cooperative, it is known that there are farmers with gender and women. This indicates that there are equal opportunities for men and women to have land rights in the plasma.

##### 4.6.4

The CH has shown that land acquisition has been done through negotiation. PT BPK had compensated the community with a total area with the total area of 2,611.030 Ha or based on SKT or 2,328.730 ha based on actual measurement. The land compensation involved 14 community groups with a total person is 960 people and was carried out during the period 1998 – 2006. Based on the results of interviews with the previous landowners obtained information if the compensation process has been held with transparency regarding the mutual agreement. The compensation process involved all community witnessed also by the Village Head, Sub-district head, and other relevant parties. Records of the land compensation process consist of documents of land identification and inventory, land location maps, statements of the release of land rights by the owner, Receipts of Payment, Minutes of compensation/Compensation, and witnesses. For example, land acquisition for an area covering 309 Ha which is owned by farmers groups of Mekar Jaya, Parit Jaya Hamlet, the village of Sungai Enau, Subs District of Sungai Ambawang, can be evidenced with:

- Declaration of Agreement PT BPK with STR (Initial) and JPR (initial) which represents the community of farmers group Mekar Jaya with numbers of members are 148 persons (JPR (initial) = 19 + 48, STR (Initial) – 49 + 21; HMD (Initial) 11) on 18 February 1998 who claims/owns / controls area inside the land title of PT BPK covering 309 Ha. That agreement described if PT BPK agreed to compensate to farmers' group, and the farmer's group agreed to deliver their land to the company as well as payment

methods. The agreement was signed by both parties and witnessed by the village head, subdistrict police head, subdistrict military head, and subdistrict Head of Sei Ambawang

- Besides declaration of agreements the company can present other documents for example land measurements documents, and administrative completeness check documents. All documents above are also signed by relevant authority.

In addition, as part of the company's development, the company has also developed palm oil plantations for the community through a smallholder scheme with a total area of 2145.59 ha consisting of two smallholders' cooperative schemes (Mekar Lestari Cooperative and Tua Jubata Cooperative). Currently, the management of the Mekar Lestari cooperative has been carried out independently and the Tua Jubata cooperative is still under company management. The development of the smallholder scheme is one of the company's efforts so that the community around the company can benefit from the company's existence. In addition, to facilitate community access, the company has opened and built access roads to the community, where there are 6 access roads that cross the company connecting the surrounding villages/hamlets. With the existence of this access road, it is easier to access from villages / hamlets that were previously via the river, now can pass through the company's access road. This information has been verified through public consultation with village head and government agency as well as workers who still live around the company.

Status: Comply

#### 4.7

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

##### 4.7.1 and 4.7.2

Procedure of land acquisition available in the documents:

- SOP Free Prior & Informed Consent /FPIC dated SOP 06/WIP-KB (0)/2011 dated January 2011 with the aims as a guide to the process of obtaining FPIC from local communities or indigenous communities as owners of land to be converted into oil palm plantations.
- SOP for the Technical Guidelines for Land / Land Acquisition Document No SOP01 / WIP-KB / (1) / 1215 on the effective date of January 1, 2015, legalized by GM PT BPK. In part E it is explained that the principle of carrying out land acquisition is in accordance with the principles of RSPO, HCVF and FPIC, namely land acquisition is carried out based on a decision that was born from a deliberation process to reach a consensus for investment interests freely without pressure (free) and the community has the right to agree or refuse (consent).

Based on public consultation with village representatives from Sungai Enau Village and Sungai Malaya Village known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the land owner and landowners are given the freedom to release their land without coercion.

##### 4.7.3

The CH has shown that land acquisition has been done through negotiation. PT BPK had compensated the community with a total area with the total area of 2,611.030 Ha or based on SKT or 2,328.730 ha based on actual measurement. The land compensation involved 14 community groups with a total person is 960 people and was carried out during the period 1998 – 2006. Based on the results of interviews with the previous landowners obtained information if the compensation process has been held with transparency regarding the mutual agreement. The compensation process involved all community witnessed also by the Village Head, Sub-district head, and other relevant parties. Records of the land compensation process consist of documents of land identification and inventory, land location maps, statements of the release of land rights by the owner, Receipts of Payment, Minutes of compensation/Compensation, and witnesses. For example, land acquisition for an area covering 309 Ha which is owned by farmers groups of Mekar Jaya, Parit Jaya Hamlet, the village of Sungai Enau, Subs District of Sungai Ambawang, can be evidenced with:

- Declaration of Agreement PT BPK with STR (Initial)and JPR (initial) which represents the community of farmers group Mekar Jaya with numbers of members are 148 persons (JPR (initial) = 19 + 48, STR (Initial) – 49 + 21; HMD (Initial) 11) on 18 February 1998 who claims/owns / controls area inside the land title of PT BPK covering 309 Ha. That agreement described if PT BPK agreed to compensate to farmers' group, and the farmer's group agreed to deliver their land to the company as well as payment methods. The agreement was signed by both parties and witnessed by the village head, subdistrict police head, subdistrict military head, and subdistrict Head of Sei Ambawang
- Besides declaration of agreements the company can present other documents for example land measurements documents, and administrative completeness check documents. All documents above are also signed by relevant authority.

In addition, as part of the company's development, the company has also developed palm oil plantations for the community through a smallholder scheme with a total area of 2145.59 ha consisting of two smallholders' cooperative schemes (Mekar Lestari Cooperative and Tua Jubata Cooperative). Currently, the management of the Mekar Lestari cooperative has been carried out independently and the Tua Jubata cooperative is still under company management. The development of the smallholder scheme is one of the company's efforts so that the community around the company can benefit from the company's existence. In addition, to facilitate community access, the company has opened and built access roads to the community, where there are 6 access roads that cross the company connecting the surrounding villages/hamlets. With the existence of this access road, it is easier to access from villages / hamlets that were previously via the river, now can pass through the company's access road. This information has been verified through public consultation with village head and government agency as well as workers who still live around the company.

Based on public consultation with village representatives from Sungai Enau Village and Sungai Malaya Village, the communities that have lost access and rights to land also provided opportunities to benefit from plantation development such as benefit in the form of plasma, CSR program, become employee and become a contractor in the company.

<b>Status: Comply</b>
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#### 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 and 4.8.4

As a guidance to settlement land dispute the company has had procedure to handling and manage land conflict namely Land Dispute Settlement Procedure (*Prosedur Penyelesaian Sengketa Pertanahan/SOP 59/WIP-KB/(0)/0915* dated 01 September 2015) with the aims as technical guidance or SOP to ensure decision steps or actions by the company regarding dispute settlement were carried out appropriately and correctly based on the provisions and regulations of applicable laws, culture, or customary laws that apply in the community. This procedure is containing a specific guidance to manage land conflict such as gathering information, conduct a meeting with complainant and use the understanding language during the process. As explained by the management representative, a mutually agreed upon system for handling complaints will be established when a conflict found.

Based on document verifications, interview with management, community including elderly and local government as well as verification through internet and RSPO Website, obtained information there are several land issues in the company operational area, as follows:

#### 1. Occupation area in PT BPK

Although PT BPK has gained land rights legally there are still many people using and cultivating in permit areas. The area is managed by the community because previously no compensation has been carried out or the owner is not willing to be compensated. For the area, the company respects and there is no coercion to occupants to hand over the land to the company. The occupied area has been mapped and identified by the company, and currently, in the operational area, there is about ± 156.97 ha still managed by the community. It has been confirmed during public consultation with land agency where in the concession of PT BPK there is an area occupied by the community (Occupation) and the National land Agency recommends that the area be released, and the company explained that will be carried during the extension of HGU.

#### 2. Dispute Area with Community of Sungai Enau Village

Even though PT BPK has obtained a land title in 1996 with a validity period until 2026, there are community groups/farmer groups in Sungai Enau Village who consider that the land title of PT BPK is valid until 2021 or 25 years as promised at the time of the initial preparation/ compensation. During the period of 2021 there were several demonstrations in the company's operational areas. The community demands land title is no longer valid, so it belongs to the community / farmers group again. There have been several meetings involving the local government, the Regional House of Representatives, the Police and even the provincial government. During the meeting there was no agreement regarding this issue. Related to this, there are explanations from the government through several letters, as follows:

1. Letter from Kubu Raya Regent's No. 590/1468/Setda-A dated 03 August 2021 regarding conflict settlement solutions between PT. BPK with Sungai Enau Village Farmers Group which described if according to the Decree of the Minister of Agrarian Affairs/ Head of BPN Number: 18/HGU/BPN/96 and HGU Certificate No. 59 that the validity period of PT. Bumi Pratama Khatulistiwa are for 30 years and valid until 2026.
2. Letter from the Head of National Land Agency Regional Kalimantan Barat Province BPN No. HP.01.03/991-61/VII/2021 dated 16 August 2021 regarding the explanation of the land title process in PT.BPK in Kubu Raya Regency
  - Issuance of land title (HGU) No. 59 based on the Decree of the Minister of Agrarian Affairs/Head of BPN No.



18/HGU/BPN/1996 dated 31 May 1996 was in accordance with the provisions of the law through the mechanisms and procedures in force at that time.

- The reason of revision the written time from 25 years to 30 years is due to a typing error by the officer and has been crossed out and initialled (renvoi) by the authorized official at that time. However, the basis for granting land title (HGU) for a period of 30 years is in accordance with the decision in the First Dictum of the Decree of the Minister of Agrarian Affairs / Head of BPN No 18/HGU/BPN/1996 dated 31 May 1996
- Based on Law No. 5 of 1960, Regulation of the State Minister of Agrarian Affairs/Head of BPN No. 2 of 1993, the decision of the Minister of Agrarian Affairs/Head of BPN No. 21 of 1994, that land title (HGU) can be granted for a maximum period of 35 years.

3. Letter from the Governor of Kalimantan Barat No 525/4484/DISBUNNAK/2021 dated 23 December 23, 2021, regarding conflict settlement solutions between PT. BPK with community around the concession, which described.

- The Governor does not have the authority to propose the extension of the land title (*Hak Guna Usaha (HGU)*)
- The problems that occur between PT. BPK with the Farmers Group of Sungai Enau Village should be settled with to be as soon as possible by considering:
  1. Letter of the Governor of Kalimantan Barat No. 525/6947/DISBUN/II/1/2021 dated 16 March 2021, regarding the prevention of plantation dispute
  2. Letter from Kubu Raya Regent's No. 590/1468/Setda-A dated 03 August 2021 regarding conflict settlement solutions between PT. BPK with Sungai Enau Village Farmers Group
  3. Letter from the Head of National Land Agency Regional Kalimantan Barat Province BPN No. HP.01.03/991-61/VII/2021 dated 16 August 2021 regarding the explanation of the land title process in PT.BPK in Kubu Raya Regency

Based on auditor verifications the process of settlement has been carried by the company in accordance with procedure that owned. The company does not use mercenaries in maintaining peace and order and based on interviews with the villages mentioned there has been no act of confrontation and intimidation by the company.

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

Apart from the plantations themselves, the company also receives FFB supplies from other parties in the form of plasma and independent plantations, namely: Letter of Cooperation Agreement between plasma smallholders, namely the Tuah Jubata Cooperative and PT BKP, dated February 25, 2015, which is valid for 25 years/has no economic value. FFB price are stipulated in work agreement that agreed by both parties. Some considerations in determining the price of FFB such as CPO prices, transportation costs, and the proposed price from the supplier. The pricing mechanism has been explained in the FFB purchase agreement which was signed by both parties. The interview with management unit also obtained information if FFB prices that has been determined are available and could be accessed by suppliers, information on price changes was made via SMS, WA and telephone to the supplier's PIC.

Based on the results of document review and interviews with the company, information was obtained that all of these documents could be accessed by farmers directly from the Plantation Office or from the Plasma Assistant through communication media. In addition, the company also has a price delivery mechanism to farmers in the form of direct information by the Plasma Assistant who visits farmers every day which is conveyed directly to the Cooperative Management.

##### 5.1.2

Based on an interview with Mekar Lestari cooperative is known by the that the price of FFB from Mekar Lestari cooperative was in accordance with prices set by the Plantation Agency and in accordance with the agreement of both parties and there are no complaints regarding the payment of FFB. The Regular updating of FFB prices to cooperation via WhatsApp group and directly short message send to member, every 2 weeks.

Based on an interview with the management of Mekar Lestari cooperative, it was informed that the management knew the price of FFB because they participated in the determination meeting.

### **5.1.3**

Base on document verification on the agreement letter between the company and Mekar Lestari and Buah Jubata cooperative has been known and signed by representatives of both parties and is known by the Regional Government. The results of interviews with cooperation members revealed that the price of FFB from Mekar Lestari cooperative was in accordance with prices set by the Plantation Agency and in accordance with the agreement of both parties and there are no complaints regarding the payment of FFB. From the results of the interview, it was also conveyed that every payment as well as in the activity/meeting for revenue sharing was always attached with a price list that issued by Plantation Agency.

### **5.1.4**

Base on document verification on The agreement letter between the company and Mekar Lestari and Buah Jubata cooperative has been known and signed by representatives of both parties and one is a woman who is a member.

The Cooperation Agreement was signed by the company and the cooperative and acknowledged by government agencies including the Kalimantan Barat Provincial Plantation Office, the Regent of Pontianak City, the Kubu Raya District Plantation Service, the Kubu Raya Cooperatives and UMKM Office and the Kubu Raya Regent.

### **5.1.6**

The mechanism related to the price, the weight of FFB paid and the number of farmers who are paid is that a Minutes of Completion of Calculation of FFB sales of Plasma Estates is always held every month. Minutes are made according to the agreement between the company and the plasma cooperative. The Minutes contains the calculation of the net proceeds and also explains in detail the following deductions and the amount paid.

The company shows the Minutes of payment from the sale of FFB from plasma plantations by PT BPK for the period April 2022. The minutes of FFB sales have included the results of FFB sales for that period after being subject to tax deductions and operating costs. In accordance with the agreement in the agreement that the instalment of investment costs is 50%, the funds paid to the cooperative will be transferred to the cooperative's bank account. The minutes are signed by the cooperative and the company.

The company every quarterly period makes a presentation related to the results and an explanation of the costs of plasma plantation products. This is indicated by the minutes of the presentation of the results and an explanation of the operational costs of plasma plantation results in the first quarter of 2022 which was attended by representatives from the cooperative and the company. In this activity, the calculation of the results of the cooperative's operations with the remaining outstanding debt is explained. Payment has been made and can be proven through a receipt for payment.

### **5.1.7**

The company has tested the electronic weigh bridge (Avery Weigh-Thronix) which was carried out on April 13, 2023, by the Head of Department of Trade and Industry, Kubu Raya Regency and valid until April 11, 2024, with evidence, among others:

- Test Result Certificate number 510.63/044/MET-B/SKHP/TU/TIMB/IV/2023 for serial number 12415124 with a maximum capacity of 30,000 Kg.
- Test Result Certificate number 510.6/045/MET-B/SKHP/TU/TIMB/IV/2022 for serial number 201550407 with a maximum capacity of 30,000 Kg.

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

### **5.1.8**

The company has carried out socialization related to RSPO certification to cooperatives/plasma farmers through annual meetings between the company and the community. The company shows the Minutes of the annual meeting on 24 May 2021 involved Sungai Enau Village and Mega Timur village which was attended by the company, village government, community representatives and cooperative farmers.



**5.1.9**

The handling of complaints from all parties is described in the Procedure for Management/Handling of Complaints and/or Complaints Document Number SOP 60/WIP-KB/(0)/0915 which was approved by the General Manager effective as of September 1, 2015. The purpose of this procedure is, among others, for complaints/ Complaints received by the company are in the form of identification of complaints/complaints in search of alternative solutions, selection of solutions, implementation and resolutions that arise or occur due to the presence, existence of the company with all forms of business activities. This SOP explains the principles of handling complaints/complaints, namely, Confidentiality of perpetrators, tiered, transparency, accountable, objective, fast, accurate and recorded.

Based on the results of interviews with representatives of the cooperative, information was obtained, they understood the mechanism for handling complaints for farmers, and all complaints, in the last 1 year their complaints from cooperatives have been explained in Indicator 4.2.3.

<b>Status: Comply</b>
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**5.2**

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

**5.2.1**

The company has carried out socialization related to RSPO certification to cooperatives farmers through annual meetings between the company and the community. The company shows the Minutes of the annual meeting on 24 May 2021 involved Sungai Enau Village and Mega Timur village was attended by the company, village government, community representatives and cooperative farmers.

**5.2.2**

The program development and implement livelihood improvement programs, including at least capacity building to increase productivity in describing on the work program cooperative Mekar Lestari cooperative and Tuah Jubata cooperative for the period 2020 until 2021. The program included, OHS, IPM, Best Management Practice and RSPO requirement. The last evaluated program on 24 May 2021.

**5.2.3**

The company shows the Minutes of the annual meeting on 2021 in involved Sungai Enau Village and Mega Timur village which was attended by the company, village government, community representatives and cooperative farmers. The meeting of minutes describes process legality of the land.

**5.2.4**

The CH has conducted pesticide handling training for plasma farmers. For example, training for KUD Mekar Lestari on January 19, 2023. The training was attended by representatives of plasma, sprayers and harvesters. Some of the material presented included pesticide handling, MSDS, first aid emergency response, and work ergonomic training.

**5.2.5**

The company shows reports related to the realization of production and sales value of FFB from the Mekar Lestari Plasma Estate and the Tuah Jubata Cooperative for the period of 2021. The report contains related to FFB production, prices, and deductions from income from taxes, maintenance, wages, harvesting, transportation and general.

<b>Status: Comply</b>
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**PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS**
**6.1**

**Any form of discrimination is prohibited.**

**6.1.1**

The unit certification has a commitment to respecting human rights and describe in the Equal Employment Opportunity Policy review in January 2018, it stated that Wilmar International committed to provide equality in employment opportunities to every employee. It

also stated that the company's beliefs and labour standards confirm that the company will not discriminate in every decision-making related to all workers, promotion or retire works/candidates based on race, colour, sex, age, social class, religion, sexual orientation, politics, or disability.

Based on the workers recruitment document, unit certification had provided equal opportunities in recruitment and operational activities. In addition, in Company's Regulation period 2022-2024 and collective labour agreement period 2022 – 2024, it stated the qualifications of workers and there were no requirements that refer to discriminate against gender, race or ethnicity, disability, sexual orientation, age, or belief. Based on interviews with spray and fertilization workers, it was found that the company has appointed all workers who were previously casual daily workers to become permanent workers in 2023. so that all workers at PT Bumi Pratama Khatulistiwa are permanent workers both on the plantation and at the mill.

The policies has been socialized to estate and mill workers as well as to the surrounding community on February 16, 2023, attended by 65 participants. Certification units can show the minutes and attendance lists for the socialization.

#### **6.1.2**

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

The results of the verification of employment documents, the results of interviews with workers and representatives of labour unions, it is known that the existing workforce in the company are recruited directly by the company without going through a third party, there is no retention of workers' documents and no recruitment fee. From the results of interviews with representatives of surrounding villages, it is also known that the company also conveys information on job vacancies to the village.

#### **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 (mill and estate).

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

##### **Recruitment and Appointment as permanent worker**

- Letter of appointment of permanent worker No. 153/BPK-HRR/SK/V/2023 dated May 25, 2023, with initial I.S. Recruitment documentation also has been shown such as job application letters, results of health checks, ID cards, diplomas, Family card and others.
- Letter of appointment of permanent worker No. 091/BPK-HRR/SK/IV/2023 dated March 30, 2023, with initial ANT. Recruitment documentation also has been shown such as job application letters, results of health checks, ID cards, diplomas, Family card and others.

##### **Promotion**

- Promotion Letter No. 041/BPK-HRR/SK/IV/2023 dated April 1, 2023, worker initial ALF casual daily worker from to regular daily employees/2A for the type of work Manuring.
- Promotion Letter No. 052/BPK-HRR/SK/IV/2023 dated April 1, 2023, worker initial A casual daily worker from to regular daily employees/2A for the type of work Manuring.

The results of interviews with workers and labour union revealed that labour 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 gender committee to deal with women's issues. The gender committee structure consisting of male and female administrators. The structure of the gender committee consists of an advisor, coach, chairperson, vice chairman, secretary etc. A gender committee has been formed chaired by the chair of the committee and coordinators in several sections and there are representatives in each unit. The gender committee structure only consists of female workers, but for builder and supervisors it consists of male representatives, namely unit managers and assistant managers. The main purpose of establishing a gender committee is to provide a forum that can accommodate the aspirations or complaints of workers (women and men), as certification unit partners in carrying out socialization activities related to gender and other policies related to workers' reproductive rights.

Further explained that the gender committee provides support for female employees, including protection and maintenance of women's health, maintenance of family life and welfare, protection from sexual harassment and violence, providing continuing education that gender equality exists in the unit of certification.

Certification unit also showed the policy against sexual harassment, violence, and reproductive rights reviewed on January 2018. It stated that Wilmar International committed to support the reporting of all incidents of sexual harassment, violence, abuse, and violations of reproductive rights experienced by any individual (regardless of gender and age).

The work program of the gender committee consists of:

- Conducting outreach/socialization related to the gender committee and regulations governing gender equality.
- Following up on harassment cases
- And others.

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

#### 6.1.6

Determination of wages that apply at PT Bumi Pratama Khatulistiwa based on the Decree of the Governor of Kalimantan Barat Province No. 1287/NAKERTRAN/2022 dated December 6, 2022, concerning Determination of the Minimum Wage for Kubu Raya Regency for 2023. As for the applicable minimum wage (2023) for Kubu Raya Regency is Rp. 2,646,878.64

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

<b>Status: Comply</b>
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### 6.2

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

#### 6.2.1

The determination of wages at PT Bumi Pratama Khatulistiwa is based on the minimum wage in Kubu Raya Regency based on the Decree of the Governor of Kalimantan Barat Province No. 1287/NAKERTRAN/2022 dated December 6, 2022, concerning Determination of the Minimum Wage for Kubu Raya Regency for 2023. As for the applicable minimum wage (2023) for Kubu Raya Regency is Rp. 2,646,878.64. Regarding the determination of wages at PT Bumi Pratama Khatulistiwa, the company showed a Decree regarding the determination of wages based on Internal Memorandum No. 003.a/BPK-HRR/IM/I/2023 dated January 2, 2023, Wage Scale 2A, 2B, 2C and 2D.

The company has a Collective Labour Agreement for 2022-2024 based on the Decree of the Head of the Kubu Raya Manpower and Transmigration Office No. 23 of 2022 dated June 22, 2022. In the Collective Labour Agreement, it is explained about work relations, promotions, demotion, working days and working hours, overtime work, rest and leave leaving work obligations, wages, BPJS employment, BPJS health, training, complaint resolution and others.

Based on interview with workers and labour union representatives known that company has paid wages is accordance with applicable regulation and has socialized Collective Labour Agreement to the workers.

The auditor team has simulated the calculation of workers' wages by verifying payroll documents for example in June 2023. For example, workers with ID BX/PBPK/0711/64 and ID BX/PBPK/0313/88. From the verification results, it is known that the company has paid wages according to the applicable regulations. Based on the document verification and interview with labour union and workers also known that deduction for workers such as BPJS deduction, tax and etc has been described in the company regulation. In addition, the company also shows payroll documents that provide information related to compensation for all work performance. Based on interview with workers and labour union representatives known that company has paid wages is accordance with applicable regulation.

#### 6.2.2

From the results of the auditor's public consultation with representatives of Sungai Enau Village, information was obtained that in the BPK Estate there were still workers who were assisted by family members who were not company employees. Then, based on the auditor's field visit during the harvesting activities in Block 115B Division 2 phase 2, it was found that 1 person with the initials MRN (harvester's wife) from the worker with the initials SR who was helping pick up loose fruit. Based on direct interviews, it is known that the person is not an employee of the company.

Based on interviews with harvesters and management representatives, information was found that the work of picking loose FFB has been provided with special personnel from the upkeep section and fulfilment is gradual and continues to be carried out so that the proportion is proportional to the number of harvesters, while pruning and gathering fronds is the responsibility of the harvester because it is fixed area for harvesters.

Based on verification of the PT Bumi Pratama Khatulistiwa Plantation Employee List for the July 2023 period, there were no personnel with the initials MRN registered as employees at PT Bumi Pratama Khatulistiwa Estate. The company also cannot prove that these personnel are employees of the BPK Plantation.

Based on this evidence, it is concluded that there are still people who work in the company's operational environment without having an agreed work agreement and this is not in accordance with applicable regulations. This becomes **Non-conformity No. 2023.01**.

#### 6.2.3

The company has shown evidence of compliance with labour provisions, such as:

- Payroll documentation that gives information on compensation for work performance. The results of the simulation of wages and overtime in June 2023 for example with worker BX/BPK/0911/68, known that the company has paid overtime wages according to the workers' overtime hours and has complied with the applicable regulations.
- Employee Attendance document every month which informs the number of attendances, leave, illness and others.
- Employee leave forms, such as:
  - Annual leave form with worker initial DR on March 16, 2023, for 1 day
  - Menstruation leave form with worker initial NM on March 31, 2023, for 2 days.
  - Maternity leave form with worker initial A on May 2, 2023, until July 31, 2023

Interview with labour union and workers, said that wages paid are in accordance with applicable regulations. Based on that interview also known that deduction for workers such as BPJS deduction, tax and etc, that has been described in the company regulation and circular letter. Based on interview with contractor and verification of wages of contractor workers (sample) known that contractor workers have given minimum wages by contractor. Regarding productions of FFB The harvester always obtained information regarding their FFB productions in previous days during morning roll call (morning meetings).

Based interview with management that always transparent about number of FFB and the weighing of FFB. The harvester always obtained information regarding their FFB productions in previous days during morning roll call (morning meetings). PT BPK has EBCC (Electronic Bunch Count Chit) as the system to record the bunches per harvester, including the FFB photo. This system is recording harvester ID, block number, total number of FFB per harvester, and quality of the crop. With this system, all the harvested FFB will be well counted and recorded. Total FFB that was harvested and recorded on this system, will be informed to the harvesters. If any FFB fails or missing during transportation to the mill, it will not impact on harvester's record. PT BPK is also implement best management

practice on the FFB transportation to the mill, by installing FFB nets on the truck.

#### 6.2.4

The results of field observations in housing areas and interviews with workers and labour union known that the company has provided housing facilities (1 house consists of 2 bedrooms and 1 bathroom), infrastructure and facilities that are decent/in good condition to workers such as houses, clean water facilities, religious facilities, sports, clinic and others. The condition of the house is permanent and has good sanitation. From the interview, also known that in each housing location there are child care areas, trash bins, electrical and others. Furthermore, regarding water facility, the unit of certification has been providing clean water stations for free that can be drinking by the workers and its regularly testing by the accredited laboratory. The results from field verification showed that there are 2 sanitation facilities (i.e. *rumah bilas*) that are located near the muster area. The sanitation facilities are provided by the company for workers to clean themselves, tools and clothing before returning to their homes. The sanitation facilities are in good working condition and the water supply is rainwater that is suitable for washing and bathing. In addition, PT BPK also provides transportations for workers as well as tank vehicle that supplies water and soap for workers, who deal with application of agrochemicals, to clean themselves in the field.

#### 6.2.5

Based on the results of interviews with residents of employee housing as well as representatives of the gender committee and labour unions, it is known that access to food can be reached easily. The distance between the housing and the nearest market can be reached within 30 minutes. Periodically there are grocers who enter the residential area. Apart from that, there is also an employee cooperative, one of which is the provision of staple goods (groceries) to all workers, interview with workers there is no evidence found that PT BPK has imposed any forms of discriminatory actions including preventing workers from purchasing staple items in the company official food-store.

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

#### 6.2.6

The determination of wages at PT Bumi Pratama Khatulistiwa is based on the minimum wage in Kubu Raya Regency based on the Decree of the Governor of Kalimantan Barat Province No. 1287/NAKERTRAN/2022 dated December 6, 2022, concerning Determination of the Minimum Wage for Kubu Raya Regency for 2023. As for the applicable minimum wage (2023) for Kubu Raya Regency is Rp. 2,646,878.64.

The certification unit has calculated the prevailing wages and in-kind benefits based on the guidelines issued by the RSPO. Prevailing wages are taken from prevailing wages such as basic wages/ minimum wages. Meanwhile, in-kind benefits are taken from all costs incurred by the certification unit for the provision and maintenance of facilities provided by the certification unit to employees, such as electricity, housing, water, schools, health facilities, employee gathering and baby care. For example, to calculate the in-kind benefit of housing, the costs considered in the calculation include building material costs, construction costs, and including maintenance costs for 30 years (technical considerations of buildings are feasible to use). The calculation result of prevailing wages and in-kind benefits received by employees is IDR. 3,776,599/month (Minimum wages in 2023, IDR. 2,646,878.64/month + in-kind benefit, IDR. 1,129,721/month for Mill) and IDR 3,776,599/month (Minimum wages in 2023, IDR. 2,646,878.64/month + in-kind benefit, IDR. 1,085,045/month for Estate). The provision of Natura (rice) is an incentive that has been implemented from 2017 until now, with a distribution mechanism based on production achievements at the end of the month. The amount of incentive rice volume given is adjusted in stages to the level of production achievement, and its not part of the fixed monthly wage.

#### 6.2.7

Based on the List of Estate and Mill Employees updated June 2023, it is known that companies no longer use casual daily workers to do all work. All workers are permanent employees.

6.2.2	Status: Non-conformity No. 2023.01
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#### 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 Wilmar Human Rights Policy document which was ratified by the Chief Executive Officer of Wilmar International in January 2018. The policy explains the company's commitment to giving workers the freedom to form worker unions.

Based on interviews with estate and mill employees revealed that each worker had received an understanding regarding freedom of association and the right to collective bargaining.

### 6.3.2

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

- Bipartite meeting on February 28, 2023, which was attended by company representatives and labour union representatives.
- Records of the Minutes of Establishment of the Bipartite Cooperation Institution which were attended by management representatives and labour union representatives.

Based on the interviews with labour union representatives, it's known that the labour union held meetings whenever it's needed.

### 6.3.3

Based on interview with labour union known that company has given socialization related to guarantee freedom of association for workers/employees. Based on interview with labour union also known that there is no intervention related to election of workers representatives or in the implementation of any activities and haven't conflict of interest with the company.

Based on interviews with trade unions, information was found that involvement in the Bipartite Organization was transparent by involving worker unions in the bipartite structure. LKS Bipartite established since 2017 and now has been represented from managements and labour. There are several meetings and minutes of meeting are available and its verify by auditor during audit

**Status: Comply**

## 6.4

### Children are not employed or exploited.

#### 6.4.1

The company has SOP Anti Child Labour Number (32/HRD/(2)/0320 revision 2 effective April 1, 2020, and approved by the General Manager. According to the Policy/SOP it is known that the minimum age for workers is 18 years.

The No Deforestation, No Peat, No Exploitation (NDPE) policy was updated on November 15, 2019, in the section "respect and protect children's rights and welfare" with the following description: "Willmar has zero tolerance for child labour practices and all forms of exploitation and violence against children. The Company is committed to eliminating all such violations throughout the Company's supply chain. Welfare guarantee and special attention for children in our operations and third-party operations are also regulated in the entire scope of this policy, as described in the Child Protection policy".

The company has conducted socialization related to company policies including regarding the protection of reproductive rights such as: Socialization on January 17, 2023, to workers and February 10, 2023, to contractor workers.

Based on the results of a field visit to the warehouse area and the Mill station, it was found that there were no child labourers. The results of interviews with representatives of workers and the Company, never found any issues regarding child labour. Thus, it can be concluded that the company has implemented a policy regarding the prohibition of employing underage children.

#### 6.4.2

The certification unit shows a list of employees accompanied by date of entry and date of birth. In addition, an example of proof of recruitment is also shown in the form of a copy of the employee's ID card and family card. From these data it is known that there are no employees under 18 years of age when accepted to work at the certification unit.

Based on field observations and interviews with estate, mill, and contractor employees revealed that there were no employees under the age of 18 when they started working.

#### 6.4.3

Based on document verification and field observations revealed that in the last 1 year there were no apprentices in the certification



unit's operational areas.

#### 6.4.4

Based on interviews with the gender committee and workers in the field revealed that the workers had understood the rules regarding the prohibition of bringing children to work. The certification unit also showed the news of the socialization and education on child protection and development on January 17, 2023, to workers and February 10, 2023, to contractor workers.

Status: Comply

### 6.5

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

#### 6.5.1 and 6.5.2

The company already has policies related to Sexual Harassment, Violence and Abuse, and Reproductive Rights Policy in the NDPE Policy which was updated on 15 November 2019 in part (v) respecting diversity and creating a work environment free of discrimination, violence and abuse as stipulated in the Charter of Human Rights Women's rights, Equal Employment Opportunity Policy and Sexual Harassment and Abuse Policy and Reproductive Rights.

The company has conducted socialization related to company policies including regarding the protection of reproductive rights such as: Socialization on January 17, 2023, to workers and February 10, 2023 to contractor workers.

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

#### 6.5.3

Basic Needs of Young Mothers (After Giving Birth) on January 16, 2023, including:

- Nutritional and Liquid Requirements that support the restoration of Health status:
  - Fulfilment of balanced nutrition through provision of milk and fruits
  - Provision of supplements/vitamins as a complementary source of nutrition
- Physical Activity
  - Light mobilization immediately after delivery according to the condition of the mother
  - Postpartum gymnastics
- Lactation
 

Provide support for the success of the Exclusive Breastfeeding program by providing breastfeeding opportunities during working hours, arranging work in affordable locations with TPA and providing jobs that are safe from chemical contact during the period of breastfeeding the baby.
- Personal Hygiene
 

Increased knowledge to always maintain personal hygiene and also the environment which is very influential with health status.

The assessed the needs of new mothers based on interview with them, so it is hoped that young mothers can feel their needs directly. The results of interviews with female workers and gender committee revealed that the company had given permission or time to breastfeeding mothers. Based on field observation at daycare also known that the company provides breastfeeding rooms for breastfeeding mothers with adequate space.

#### 6.5.4

Company showed procedure in handling any grievances (No. SOP60/WIP-KB/(01)/0915) validated on January 6, 2021, concerning in handling grievance and consultation for all stakeholders. The procedure explained activities of handling grievances related to workers' and all stakeholder's grievances through each worker's supervisor, grievance logbook, suggestion box, gender committee, labour union, company's hotline number etc. This procedure also explained that the company can be brought the complaints to the RSPO complaint system if there wasn't any solution yet and protected the identity of the whistle-blower if needed. In addition, it was also explained that the response time period is 14 days. The officer responsible for responding to stakeholders is the Manager/Assistant/Administration Head/Public Relations.

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

**Status: Comply**

## 6.6

### No forms of forced or trafficked labour are used.

#### 6.6.1

Based on interview with workers and labour union and employment document verification known that workers accept work voluntarily and freely, and following are not found during audit such as retention identity, recruitment fees, involuntarily overtime, lack of freedom to resigns, penalty for termination, debt bondage, withholding wages. The certification unit also does not force or make it difficult for employees to resign. There is no penalty for termination if they wish to terminate the contract early. All workers who work are in accordance with the mutually agreed agreement or letter of appointment.

Based on document verifications and field observations in spraying & harvesting activities at Estate and Mill operations activities, there were no forms of forced or trafficked labour are used. Besides that, there are no foreign workers who work at PT Bumi Pratama Khatulistiwa.

#### 6.6.2

Based on a review of the July 2023 Plantation Employee List document, there are 729 permanent workers and the July 2023 POM Employee List, there are 126 permanent workers. So that when this surveillance was carried out the company no longer used temporary workers or Certain Time Work Agreements or migrant workers.

The results of the verification of the labour register documents, work agreement documents, interviews with labour unions, workers, and the Manpower Office known that there are permanent workers at PT Bumi Pratama Khatulistiwa. From the results of interviews with workers, known that there is no forced labour in the company. All workers who work are in accordance with the mutually agreed agreement or letter of appointment.

**Status: Comply**

## 6.7

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

#### 6.7.1

##### OHS organization.

The CH already has an OHS organization in the form of an OHS committee for PT BPK in accordance with the Decree of the Head of the Office of Manpower and Transmigration of Kalimantan Barat Province Number 174/NAKERTRAN.P2K3/2022/NAKERTRAN.P2K3/2022 concerning ratification of the organizational structure of the OHS Committee PT BPK, appointed in Pontianak on November 2, 2022. The secretary of the OHS Committee is a worker with the initials MF and chairman of ST. The CH shows an OHS expert authority card and an official OHS expert decision from the Ministry of Manpower of the Republic of Indonesia number 92373/PK3/AJ/61/2021/P0 dated 18 March 2021, valid for 3 years.

##### Periodic meeting

The CH has an OHS Committee in each unit which is responsible for the implementation of OHS aspects. One of the activities of the OHS Committee is to conduct monthly evaluations regarding the implementation of the OHS program. For example, at the OHS Committee meeting on 31 May 2023 at the BPK POM, which was attended by 17 members, they discussed, among other things, the review for the 1st quarter of 2023, dissemination of life saving rules, and work accidents.

#### 6.7.2

The company demonstrates procedures for prevention and handling of emergencies such as fire incidents and others (listed in document No. PRO – GEN – 023 Revision 4, dated November 05, 2020). The procedure describes the coping mechanism as follows: Plantation and Forest Fires, Factory Fires and Residential Fires.

##### First Aid Officer

The CH has a licensed first aid officer with the initials Myd, appointed on December 28, 2021. The CH also held fire management and

first aid training on March 20 2023 with 23 participants.

Based on field observations, such as during harvest and spray activities, it is known that the foreman carries a first aid bag. The results of the interviews revealed that they had received first-aid training and were able to explain the name and function of the first-aid equipment. The results of the document review also revealed that first aid training had been carried out, for example on December 21 2022 at BPK POM with 14 workers participating.

Based on field observations at BPK POM and offices, it is also known that there is an evacuation route that leads to the gathering point in case of an emergency. Fire extinguishers and hydrants are available in ready-to-use condition. The hydrant test results at the Boiler Station function well. Likewise in housing, there are evacuation routes and gathering points.

#### **First aid kit**

Based on field observations at BPK POM found that there were several contents of the first aid kit that had expired, as follows:

- Pos Security: Povidone Iodin expires in May 2020.
- Workshop: Povidone Iodine expires October 2020, Rohto expires April 2023, and Otsu Water Injection expires January 22, 2022.
- Hazardous and Poison Waste Temporary Storage: Povidone Iodine expires in May 2020 and Rohto expires in April 2023
- There is a monitoring form for the contents of the first aid kit updated in June 2023 in the first aid kit, but the contents of the first aid kit are not identified.

Then, the minutes of replacing the contents of the first aid kit which expired on July 6, 2023, were also shown at the security, workshop, and Hazardous and Poison Waste Temporary Storage.

Based on this evidence, it is known that there are some expired first aid kits in the workplace. This becomes **Non-conformity No. 2023.02**.

#### **Records of work accidents**

As stated in the OHS Committee report and the monthly monitoring of work accidents carried out by the OHS committee secretary, it is known that during 2023 there were no work accidents at factories which caused lost work days. Meanwhile for the plantations there were 8 work accidents that caused lost working days, such as being pricked by thorns, being cut, and falling on FFB, which were resolved with medical aid alone. All work accidents are recorded, evaluated in the OHS Committee's monthly report, and reported to the relevant Office.

##### **6.7.3**

The CH already has an SOP on PPE with the code SOP/BPK-EHS/006/0213 dated 01 May 2013. The procedure regulates, among other things, Identification of PPE, Procurement of PPE, distribution of PPE according to work risk (IBPR), frequency of PPE replacement, replacement PPE that is damaged, as well as disciplinary sanctions for those who do not wear PPE / violate procedures.

Based on the results of field observations and interviews with workers at the Mill and Estate, it is known that workers have used PPE in accordance with the requirements in the HIRAC document and can explain well the function of the PPE used. The PPE available to all workers covers all operations that have the potential to cause danger, such as the use of pesticides, and machine operations, including harvesting. MSDS is available which can be a reference source in determining the required PPE. All PPE is provided by the company free of charge and will be replaced if the PPE is no longer suitable or no longer provides maximum protection. Recordings of the minutes of the handover of PPE, rubber gloves, and aprons for 2 damaged spray workers on May 24 2023 have also been shown. This means that sufficient stock for replacing damaged PPE is available at the company.

Field verification results show that there are 2 sanitation facilities, namely a rinse house and a clean water tank that accompanies the sprayer when working. The company provides sanitation facilities for workers to clean themselves, their equipment, PPE, and clothing, and change into clean clothes before returning home. Sanitary facilities are in good working condition suitable for washing and bathing. The tank that supplies clean water and soap that accompanies spray workers functions to clean themselves in the field.

##### **6.7.4**

The company provided health services such as polyclinics and first aid kit. Based on field observations, it was known that the facilities and infrastructure provided for workers are still functioning properly. Based on the documents review and interviews with workers (harvesters, pesticide applicators, mill operators), it revealed that all workers were registered in the BPJS program, proven as follows:

- BPJS (Health Insurance) payments for Estate workers have been completely fulfilled and the last proof of payment is on May 10, 2023, for period of May 2023 for 669 employees.
- BPJS (Health Insurance) payments for Mill workers have been completely fulfilled and the last proof of payment is on May 10, 2023, for period of May 2023 for 103 employees.

According to findings of non-conformities previous assessment, the unit certification shows the program to register all its employees in the social insurance program, namely BPJS Employment and Health, and gradually the registration has been carried out and the contributions will be billed in the next period so that there are no more employees who are not registered as BPJS participants, both BPJS Employment and BPJS Health for all employees.

Based on the interviews with workers (harvesters, pesticide applicators, and mill operators) and the labour union, it is known that they acknowledged their involvement in the BPJS program and also held the BPJS card.

Wilmar has the policy to allow sick-leave if the workers provide official letter from medical facility or doctor. As implementation for the policy, PT BPK has an estate clinic that provides free medical and available to all workers. The estate clinic has an onsite doctor, who issues medical prescription based on expert opinion. The estate clinic will make referral to external healthcare facilities for more specialized treatment.

#### 6.7.5

As stated in the OHS Committee report and the monthly monitoring of work accidents carried out by the OHS committee secretary, it is known that during 2023 work accidents only occurred in estates as many as 8 accidents which caused lost working days. The accident was caused by being stabbed by a thorn and being treated with medical aid by the company. The CH has submitted work accident reports, incident investigations, and evaluations related to work accidents. The company has also recorded LTA. For example, in May 2023, known FR (2.9), SR (0.0), and LTIR (1.45).

6.7.2	Status: Non-conformity No. 2023.02
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### 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 CH has Plant Protection – Pest and Disease Control contained in the 2015 Agronomy Guidelines and SOPs for Oil Palm Plantations. SOPs are prepared as guidelines for pest and disease control in oil palm plantations in accordance with management policies. Pest and disease control processes include detection, census, control recommendations, control, and evaluation.

The results of a field visit to the BPK Block 113 and 115 Phase 2 Estate, found traces of a bagworm attack on an old frond. The results of interviews with PIC Pest and Disease found that in December 2022 for Block 115 and January 2023 for Block 113, there was a mild scale bagworm attack in the Block. From the results of the study of census documents it is known that the attacks are mild and controlled in isolation using the Chepate pesticide by means of trunk injection to the affected trees. Results of the January 2023 census document study, the attack on Block 115 was 0%. For Block 113, the results of the census in February 2023 for this block had no caterpillar attacks.

The results of field observations also revealed that there was a Ganoderma attack in Block 045. The results of interviews with PIC Pest and Disease found that Ganoderma control was carried out without burning. Ganoderma trees were isolated, their roots were decided, and Trichoderma applications were carried out.

##### 7.1.2

Invasive species in Indonesia refer to the Minister of Environment and Forestry Regulation number P.94 of 2016. The results of field observations in Block 112 B Phase 2 Division 1 and Block 128-129 Phase 3 Division 2, it is known that there are beneficial plants that are not classified as invasive species, namely *Turnera subulata* and *Antigonon leptopus* are well preserved.

##### 7.1.3

There is no use of fire for pest management purposes. Estate management prefers to control pest populations by biological method

instead of chemicals. This matter is verified through field observation which shows that there were no indications of fire activities in estate operational areas. This is in accordance with the results of field observations and interviews with workers, namely the company does not use fire to control pests.

**Status: Comply**

## 7.2

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

#### 7.2.1

Results of document review and field observations on Circle Path Spraying work using the Supremo pesticide. The basis for using specific pesticides against target pests/weeds has been shown by the company in the Justification Agrochemical 2023 document. For example, the Supremo pesticide for broad leaf and narrow leaf weeds; and Chepate for bagworms.

#### 7.2.2

The CH has maintained records of pesticide use. It has been shown in the document Analysis on the Use of Active Pesticide Substances which contains the brand of the pesticide, the active ingredient, LD<sub>50</sub>, and the use of the active ingredient per hectare. For example, Supremo, the active ingredient isopropyl amine glyphosate 480 g/l with an LD<sub>50</sub> Oral of 4.467 mg/kg and dermal >7.500 mg/kg, used during May 2023 as many as 792 liters with the active ingredient used per hectare of 0.0021 grams.

#### 7.2.3

The CH is committed to minimizing the use of pesticides and has an IPM concept, which is contained in the document in accordance with the IPM plan to reduce the use of pesticides which is included in the Agronomy SOP (No.SA11/EMU/0/1014) by replacing pesticides with biological control such as using predators natural to control mice with Owls and *Turnera subulata* and *Antigonon leptosus* as predator hosts for Nettle Caterpillars. The results of the February 2023 census showed that there were no pest attacks, as proof of the implementation of IPM. The results of field observations also show that there is a Barn Owl Box in Block 113A Phase 2 Division 1, which is in active condition.

The results of the document review show that there is a tendency for pesticide use to decrease, for example, the use of glyphosate with the Supremo brand in 2022 is 0.0022 Liters/ha, and up to May 2023 it is 0.0016 Liters/ha.

#### 7.2.4

Based on document review and interviews with PIC Pest and Disease, it is known that there is no prophylactic use of pesticides. Pest and disease control is carried out based on census results verified by the Department of Pest and Disease, to determine further actions.

#### 7.2.5

Based on review of documents on the use of pesticides for the period 2022 and up to May 2023 found that there was no paraquat and no pesticides included in WHO class 1a and 1b or included in the Stockholm convention. The results of field observations in Circle path spraying activities in Block 106 Phase 1 show that workers use supremo materials. The results of interviews with company representatives found that in the last 1 year they used pesticides. Based on this, it is known that there is/is no use of pesticides included in WHO classes 1a and 1b, or included in the Stockholm convention, as well as paraquat in company operations.

#### 7.2.6

The CH has procedures for handling materials & materials with code SOP/EHS-BPK/016/2015 revision 0 dated 04 December 2015. These procedures aim to ensure that materials/materials stored, transported/moved, used, and disposed of are safe and meet OHS requirements.

Pesticide applications have been carried out by persons who have completed the required training and have been applied according to the product label. The results of interviews during field observations at the Circle path spraying activity, Block 106 Phase 1, revealed that workers were able to explain the safe handling of pesticides according to procedures and product labels according to the available MSDS. The source informed that they had received training in handling pesticides from the company. The results of field observations also show that workers have implemented safe work techniques by using PPE in accordance with HIRAC, which can be easily replaced if damaged. As a result of the document review, it is known that pesticide handling training has been held at the company, including on February 8 2023 in Phase 1 and February 23 in Division 2.

#### 7.2.7



The storage of pesticides at the company complies with best practices. The results of field observations in the pesticide warehouse area on the BPK Estate note that pesticides have been grouped by type, there is an MSDS in a language understood by workers, symbols for hazardous and toxic substances, in a place with good air circulation and sufficient lighting. The warehouse is locked and there is a limited area warning and the use of PPE when accessing it. The results of interviews with workers revealed that workers could explain and demonstrate safe work techniques in that area.

#### 7.2.8

The company has an SOP of pesticide storage areas and how to work in the pesticide storage area with no. document 14 / WIP-KB / (0) / 0610 revision 0 on January 2011. The SOP describes the mechanism for storing pesticides in a special warehouse, including a place for mixing pesticides to be used in the field in a special isolated place so there is no potential for chemical exposure to outside the warehouse. Storage of used pesticide packaging is stored in a temporary storage area for hazardous and toxic waste materials and then sent to a licensed collector.

Based on field visits in the pesticide warehouse and the temporary storage area for hazardous and toxic waste in the estate, it was found that the pesticide storage area was well managed, oil traps were available, adequate and isolated airways so there was no potential for pesticide exposure to leave the warehouse. Pesticide waste, such as used pesticide packaging, which is classified as hazardous and toxic waste, was also found to be stored in a temporary storage warehouse for hazardous and toxic materials which were properly monitored and then collected to licensed collectors.

Based on interviews with employees and foremen of pesticide application in estate, it was found that all containers used for pesticide packaging were returned and sent to temporary storage places for hazardous and toxic waste materials that were not used for purposes other than pesticide application activities. All used containers, work tools and work clothes are stored in a special storage area. Thus, there are no contaminated items to be taken home. The results of the employee's home observations show that it is not found that the used pesticide packaging is disposed of at the disposal site and is not used for other purposes such as trash cans, flower pots and so on.

#### 7.2.9

Based on document review and interviews with company representatives found that pesticides and herbicides were not applied through the air.

#### 7.2.10

There were CHE examination results for 127 workers and Audiometry for 19 workers which were carried out at the UPT Occupational Health Laboratory at the Office of Manpower and Transmigration, Kalimantan Barat Province. CHE's initial inspection on 28 – 30 November 2022 included 50 sprayers and supervision; 41 fertilizers and supervision; warehouse clerk; as well as other workers associated with chemicals. From the results of the examination there were 34 workers with "Mild" (Abnormal) CHE levels consisting of 16 sprayers, 10 fertilizers, and several other workers. The 34 workers were transferred from work related to pesticides and then underwent a re-examination on 21 February and 03 March 2023 for workers with abnormal CHE, and it was found that there were 5 fertilizers and 6 sprayers with abnormal results. Then a re-examination was carried out on June 19, 2023, for workers who were still not normal. It is known that the results of the last cholinesterase examination showed that all workers were normal.

#### 7.2.11

The CH has a commitment regarding pesticide applicators that are not carried out by pregnant or lactating women, or people with medical limitations contained in the internal memorandum (No. 058/HRR/INT/V/2012, date May 31, 2012). The results of field observations at Circle path spraying activities in Block 106 Phase 1, it is known that there are no female workers who are pregnant, and/or breastfeeding, or with medical limitations. The results of the interviews revealed that women workers who were pregnant or breastfeeding, or workers with medical limitations were transferred to non-pesticide jobs. Based on this, it is known that there are no workers who are pregnant, or breastfeeding, or with medical limitations who apply pesticides.

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

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

#### 7.3.1



The company has identified waste both from plantation operations and from palm oil mill operations. Based on document verification shown company has implemented waste management accordance with waste identification source and management plan for examples are:

- Mill, waste source: FFB process, waste type: shell and fiber (non-toxic/hazardous waste), managed by renewable energy usage for boiler.
- Estates, waste source: pruning activities, waste type: oil palm frond (organic waste), managed by frond stacking.
- Non-hazardous and toxic waste, including domestic waste, is managed in the form of reuse for items that can still be used, such as used fertilizer sacks, as well as plastic layers inside the sacks to transport loose fruits and tie the sacks. In addition, waste that cannot be reused will be collected, if it still has economic value such as scrap metal and used tires, it will be sold. Non-hazardous waste that cannot be reused will be disposed of in a landfill with a landfill system when it is full. Transportation of non-hazardous waste from employee housing or emplacement areas is carried out once every 2 weeks using dump trucks and directly disposed of to the Landfill.
- The company has an SOP for the utilization of solid waste (SOP/BPK-EHS/012/2013), which includes the utilization of empty stubs.
- The management of jangkoks carried out by the company is by pressing them to be used as boiler fuel, sent to farmers, and sold to other parties. However, the results of verification of the utilization of empty fruit tree data, obtained information on closed stock: In 2020 it was 44,801.78 Tons; In 2021 it will be 52,575.32 tons; In 2022 it will be 51,796.98 tons; until June 2023 amounted to 54,040.05 tons (increasing trend).

#### OFI

Based on observations at POM, there are quite high piles of EFB. Companies are encouraged to improve management of empty fruit bunches, including reduction, recycling, reuse and disposal to mitigate pollution considering that the location of the Mill is close to the Landak River.

#### 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:

- Domestic waste: based on field observation, the company has collected domestic waste periodically and dump it to the landfill and it's known that location of landfill is far away from waterways and the housing area.
- The EFB is first processed using a chopper and press to reduce the water and oil content. Before being distributed to the parties, the EFB is placed in a special area in the Mill, the storage area is equipped with a ditch that functions to collect the leachate produced by the EFB, after the leachate has collected in the area it is then pumped into the WWTP pond number 9 in a closed installation. Based on the results of a visit to the POM at the EFB storage area, the auditors verified that the area was a closed area with a machine functioning as a pump for leachate generated from the EFB pile, the area was closed from other water bodies, such as ditches and rivers.
- POME managed on WWTP pond and disposal to surface water, based on the results of interviews with WWTP pond operators and field visits at the WWTP pool, information was obtained that there was no evidence of environmental pollution, there is a safety fence in the WWTP pond, there are maximum POME height limit stakes, there is no POME flow in other areas, there are observation points for POME samples released into the body. water, POME samples are tested monthly and there is also an online integrated digital pH, BOD and COD value meter.
- The company already has licensed hazardous storage for estates and mills as described in indicator 2.1.1. The company also has a cooperation agreement with a licensed Hazardous waste carrier to transport Hazardous waste produced by the company for estate and mill.

#### OFI

Based on observations at the clinic and interviews with the PIC of the clinic, it is known that medical waste has been stored in plastic bins and there is no information on how long it has been stored in the clinic. Companies have the opportunity to ensure proper disposal of medical waste and increase employee understanding of medical waste disposal procedures.

#### 7.3.3

The company has socialized waste management without burning which was carried out on February 7, 2021. Based on field

observation known waste separation is separated based on the type of wet and dry waste, garbage transportation is carried out routinely, waste separation organic and inorganic are adjusted to the appropriate tub then put into the final waste disposal and closed periodically. Based on the results of interviews with Mill and estate workers, information was obtained that they had understood the prohibition of burning waste.

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

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

##### 7.4.1

The unit of certification has an SOP policy on the management of soil fertility in the Estate fertilization section. Meanwhile, there is a soil sampling procedure (SA 12/EMU/ (02)/1021, rev 02) dated 01 October 2021 as a guidance for soil sampling analysis.

- Soil sampling is carried out regularly every 15 years or if necessary, during replanting, to determine the status of soil fertility in each soil management class group based on the soil survey report document by the consultant.
- The number of soil samples to be taken is determined by the agronomist, considering the relatively similar topographic and climatic conditions for the entire estate, soil samples can be taken per soil management class or soil order or series.

For analysis of leaf tissue, it is contained in SOP SA 06/WIP-KB/(0)/0223 which has been in force since February 2023, where leaf sampling is carried out every year.

The results of a review of basic info documents show that the yield per hectare is  $\pm 17$  tons/ha. The results of interviews with company representatives found that the cause of low production was because the population per hectare was quite dense (146 principals/ha), then thinning out was carried out starting in March 2022 to 126 principals/ha. The results of a study of crops for 2022 and 2023 to date June 27, 2023, it is known that the yield per hectare to date is 8.11 tons/ha higher than last year's 7.58 tons/ha.

##### 7.4.2

The latest records of soil and leaf tissue analysis are available, as follows:

- Soil tissue analysis was carried out by the EMU R&D laboratory, on March 8, 2021, with a total of 12 samples, with test parameters including pH, Organic C, Total N, and KB.
- Leaf tissue analysis was carried out by the EMU R&D laboratory, July 1, 2022, with a total of 96 samples, with test parameters including N, P, K, Mg, Ca, and B.
- Analysis of leaf tissue in 2023 was only completed in May 2023 and is currently in the process of testing in the laboratory.

##### 7.4.3

The results of interviews and field observations revealed that POME was not applied to the land, because The CH has a permit for disposal of wastewater No. 503/008/DPMPTSP-E/IPLC/2017 dated 23 November 2017 with a validity period of up to 5 years. For empty fruit, it is also not applied to the land, but is used as boiler fuel.

##### 7.4.4

The CH has maintained records of the use of fertilizers that have been applied to the estate. For example, during the period from January to May 2023, several fertilizers have been applied, including Kaptan 2,116.40 tons of the recommended 2,216.31 tons. Then also Bunch as realized 271.81 tons from the recommendation of 420 tons.

<b>Status: Comply</b>
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#### 7.5

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

##### 7.5.1

The entire area of PT Bumi Pratama Khatulistiwa is peat based on semi-detailed land survey documents. Maps of soil types are found in semi-detailed land survey documents. The map scale used is 1:50,000. However, the results of the overlay between the GIS Database 2023 map and the PIPPIB (Indicative Map for Termination of Granting Business Permits) period 1 of 2023, it is known that the PT BPK area is not included in peat land.

Based on the semi-detailed soil survey map report in September 2014, it was informed that the slope of the land in the company's operational area is in the flat category (0-2° or 0-4%). Thus, the company does not have a sloping area management strategy.

**7.5.2**  
Based on field observations of all assessment areas during the audit, document review, and interviews with company representatives, revealed that there were no replanting or new planting in all BPK estate areas.

**7.5.3**  
Based on field observations of all assessment areas during the audit, document review, and interviews with company representatives, revealed that there were no replanting or new planting in all BPK estate areas.

**Status: Comply**

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

**7.6.1**  
The entire area of PT Bumi Pratama Khatulistiwa is peat based on semi-detailed land survey documents. Maps of soil types are found in semi-detailed land survey documents. The map scale used is 1:50,000. However, the results of the overlay between the 2023 GIS Database map and the PIPPIB (Indicative Map for Termination of Granting Business Permits) period 1 of 2023, it is known that the PT BPK area is not included in peat land.

Based on the semi-detailed soil survey map report in September 2014, it was informed that the slope of the land in the company's operational area is in the flat category (0-2° or 0-4%). Thus, the company does not have a sloping area management strategy. The development of the operational area refers to the semi-detailed land survey document and the 2014 land suitability document.

**7.6.2, 7.6.3**  
Based on field observations of all assessment areas during the audit, document review, and interviews with company representatives, revealed that there were no replanting or new planting in all BPK estate areas.

**Status: Comply**

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

**7.7.1**  
Based on field observations of all assessment areas during the audit, document review, and interviews with company representatives, revealed that there were no replanting or new planting in all BPK estate areas. From the results of the document review it is also known that the last planting was carried out in 2016 (replanting area).

**7.7.2**  
The CH has shown evidence of reporting the latest peat inventory via G-form in accordance with the RSPO announcement on 19 September 2022. Reporting was carried out on 21 December 2023. Reporting refers to government regulations regarding PIPPIB. The results of the overlay between the Company's map and PIPPIB's 2023 semester 1 show that the PT BPK area is not included in the peat area in PIPPIB.

**7.7.3**  
PT BPK has monitored subsidence in peat soil, documented it, and minimized it. The results of field observations in Block 146 Phase 4 Division 2 show that there is a subsidence pole that is installed and in good condition. The results of field observations also show that there are weirs equipped with stick poles in the ditches on both the collection road and the main road, such as in Block 212 B Phase 2. The installation of weirs is an effort to keep water in the peat block, so that land subsidence does not occur. The results of the document review show that the first peat inventory report on April 28, 2020, revealed a peat area of 4,437.93 ha. The results of the document review found that the company had 18 subsidence poles, which means that each subsidence pole represented ±246 ha. It is also known that the results of monitoring are conducted every 3 months, with the last monitoring in May 2023 with a range of 0.1 to 4.3 cm.

**7.7.4**  
The CH has a water management program and has implemented it. The CH already has a Water Management Map that informs the location of compliance points for manual Groundwater Level Monitoring (TMAT) and loggers from the Ministry of Environment and

Forestry, locations for monitoring subsidence poles, weirs, water reservoirs, and drainage flow directions.

The results of field observations in Block 115 A, it is known that there are loggers whose monitoring is automatically connected to the Ministry of Environment and Forestry. Determination of monitoring points is carried out based on the Decree of the Director General of Pollution Control and Environmental Damage number SK.124/PPKL/PKEG/PKL.0/12/2022 concerning TMAT Management Points and PT BPK Rainfall Monitoring Station Points. There are 20 manual TMATs and 2 loggers. Manual monitoring is carried out every 2 weeks.

To maintain the availability of water in the block, the Company built 256 weirs equipped with stick poles. The results of field observations in Block 212 B Phase 2, there are well-maintained weirs and stick poles. The results of the document review found that the water level measurement results in the Block 113 ditch were at a height of 50-60 cm.

#### 7.7.5

As a result of interviews with representatives of the CH, it is known that on 23 April 2020 it notified the RSPO that the reporting of peat inventory base to PIPPIB. The results of the overlay between the Company's map and PIPPIB's 2023 semester 1 show that the PT BPK area is not included in the peat area in PIPPIB. Based on this, the PT BPK drainability assessment was not reported to the RSPO, referring to peat inventory reporting.

However, the company has carried out a drainability assessment related to the plan to replant 183.26 ha but until the audit was carried out, replanting had not been carried out. While the results of the drainability assessment conclude that the depth to Drainage base is more than peat thickness of the peat – the drainage base is in the mineral soil below the peat – then the DLT does not need to be calculated.

#### 7.7.6

As a result of interviews with management representatives, it was found that all existing plantings on peatland were managed in accordance with applicable laws and regulations and/or the "RSPO Guidelines for Best Management Practices (PPT) for Oil Palm Cultivation on Peatlands. The CH presented the Peat Ecosystem Recovery Report and Compliance Points for the 2nd quarter of 2023 which provided information, among others, on compliance with groundwater level monitoring. Compliance monitoring points are carried out based on Decree of the Directorate General of Pollution Control and Environmental Damage number SK.124/PPKL/PKEG/PKL.0/12/2022 dated 27 December 2022 with a total of 22 monitoring points which are carried out every 2 weeks. In accordance with this, the results of field observations in Block 115 A Phase 2 show that there are loggers in well-maintained conditions. The results of the document review also show that monitoring is carried out every 2 weeks. The monitoring results of the 4th month of June 2023, it is known that the groundwater level is 29-36 cm. The CH also monitors the water condition in the main and secondary ditches every week. The results of field observations also revealed that there were weirs and stick poles in block 212 B Phase 2 which were in good condition. Meanwhile, the results of sensitive monitoring on June 4 revealed that the groundwater level was between 55 and 60 cm.

#### 7.7.7

Based on field observations and document review of PT. Bumi Pratama Khatulistiwa, it is known that the entire plantation area of PT Bumi Pratama Khatulistiwa is located in peat areas. There are areas not planted with oil palm which consist of canals, roads, buildings, factories, airways, and enclave areas. There are no peat land reserves and peat land that is not planted is an HCV area.

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

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

##### 7.8.1

The realization of water quality improvements that have been carried out by the company include:

- HCV identification and river buffer zone details including:
- Conduct socialization to all employees and the surrounding community not to use the water for consumption activities.
- Maintain a hygienic environment around water sources so that sources of pollutants can be minimized.
- Report the results of the examination in accordance with the provisions of the applicable laws.
- Testing the quality of river water and boreholes listed in the RKL/RPL report.
- Management of surface water erosion and runoff, water management in low-lying areas and monitoring of surface water quality as stated in the implementation of the semester RKL-RPL

- Management of riverbanks and water sources in the form of reservoirs.
- Regularly conduct water testing
- Waste water management using WWTP.
- Monitoring the use of water for palm oil processing and evaluating its use.
- Planting local plants such as Banyan, Leban, Guava, Balik Angin, Coconut, Matoa, Ketapang and Jackfruit

The company has carried out surface water quality testing including

- Malaya River tributary with buffer 5 – 10 m
- Ampening trench with 5 m buffer
- Kongsu trench with 5 m buffer zone
- Gotong Royong ditch buffer zone 5 m
- Landak River buffer zone 100 m
- Tempayan river with a buffer zone of 5 m.
- The Landak River upstream and downstream refers to the water quality standards of PP RI No.22 of 2021. There are parameters that do not comply with the pH, BOD and COD quality standards. This condition is due to high natural conditions (peat).
- Ampaning River, Malaya, Tren Kongsu refers to the water quality standards of PP RI No.22 of 2021. There are parameters that do not comply with the pH and COD quality standards. This condition is due to high natural conditions (peat).

### 7.8.2

The unit certification conducted practices maintain the quality and availability of surface and groundwater, explained on HCV management plan to maintain the HCV areas in the operation area of PT BPK, listed on Management plan HCV 2020 and 2021 documents. HCV management activities that are taken by the management unit are

- maintained HCV attributes (HCV boundary, signboard),
- HCV socialization (community and worker),
- maintain HCV area,
- regular patrols for maintaining HCV security and water source.
- Planting local plants such as Banyan, Leban, Guava, Balik Angin, Coconut, Matoa, Ketapang and Jackfruit.

As a result of the visit to block 210 of the Malaya River, the company has planted trees on the riverbanks and installed signboards prohibiting activities, including banning the use of chemicals around the riverbanks and disposing of garbage on the riverbanks.

### 7.8.3

Based on document review and field observation, it is known that:

- The company has a permit for disposing of liquid waste into water bodies based on a letter from the Investment and One-Stop Services Office of Kubu Raya Regency Number 503/008/DPMPTSP-E/IPLC/2017 dated 23 November 2017.
- Based on field observations in WWTP ponds, it is known that BPK Mill has 9 WWTP pools with a total volume of 80,690 m3. However, Pond 2 is not functioning (it is used as a POME sludge dump).
- The company has a Sparing Tool (installed in 2020) as a fulfillment of the obligation of the Minister of Environment and Forestry No. P.93/MENLHK/SETJEN/KUM.1/8/2018 Concerning Continuous and Network Monitoring of Wastewater Quality for Businesses and/or Activities.
- The results of public consultations with environmental services of Kubu Raya Regency obtained information that previously there had been complaints from the public regarding wastewater pollution from BPK Mill to environmental services of Kubu Raya Regency.
- Then from the results of field observations at the waste water treatment plant BPK Mill pool on July 4, 2023, data on the quality of liquid waste discharged into water bodies using monitoring sparing devices obtained the following data:
  - COD: 636.5 mg/L (COD Quality Standard based on PermenLH No. 5 of 2014 is 350 mg/L)
  - TSS: 653 mg/L (TSS Quality Standard based on PermenLH No. 5 of 2014 is 250 mg/L)
- Based on the results of lab tests accredited by KAN, for example the quality of WWTP wastewater for the June 2023 period, the following data is known:
  - COD: 340 mg/L (COD Quality Standard based on PermenLH No. 5 of 2014 is 350 mg/L)
  - TSS: 220 mg/L (TSS Quality Standard based on PermenLH No. 5 of 2014 is 250 mg/L)



Based on the explanation above, it is known that there are results of monitoring the quality of BPK Mill liquid waste using sparring tools that are discharged into water bodies that exceed the quality standards based on applicable regulations (PermenLH No. 5 of 2014) where this is different from the results of laboratory tests that are accredited by KAN. Therefore, this becomes **Non-conformity No. 2023.03**

#### 7.8.4

The procedure of water use monitoring in mill available under document Procedure of Water Treatment Plant. Water consumption monitored by using flowmeters installed in the piping system of WTP. Base document verification water consumption record for period 2022 fresh water usage 182.310 m<sup>3</sup> and mill fresh water per produced tonne 1.26 (M3 / MT FFB), with standard 1.3 M<sup>3</sup> / MT FFB.

**7.8.3**      **Status: Non-conformity No. 2023.03**

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

#### 7.9.1

The unit certification already maximizing the use of renewable energy (fiber & shell) as boiler fuel. For example, use of shells and fiber period January to December 2022

Period (Month)	Tbs Olah (Kg)	Pemakaian Solar (Ltr)	Pemakaian Cangkang (Kg)	Pemakaian Fibre & Tankos (Kg)
January	6,728,257	10,231	322,347	1,686,659
February	5,796,774	9,363	221,376	1,388,501
March	9,123,360	9,788	290,424	2,345,438
April	9,928,136	8,885	253,002	2,476,365
May	13,781,227	6,035	353,443	3,357,166
June	15,270,241	5,115	355,119	4,060,023
July	15,543,935	4,708	367,732	4,929,843
August	17,145,846	3,841	373,457	5,245,287
September	14,964,515	4,991	335,372	3,712,155
October	11,834,308	7,646	225,293	2,128,257
November	11,341,799	7,558	234,074	2,251,699
December	9,457,634	9,222	185,013	1,986,361
<b>TOTAL</b>	<b>140,916,032</b>	<b>87,384</b>	<b>3,516,652</b>	<b>35,567,754</b>

**Status: Comply**

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

#### 7.10.1

The 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 BPK POM and its supply base are listed as follows:

Summary Emission

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.64
PK	1.64

**Production**

**t/yr**



FFB processed	140,916.03
CPO produced	26138.091
PK produced	4769.79

<b>Extraction</b>	<b>%</b>
OER	18.55
KER	4.18

<b>Land use</b>	<b>Ha</b>
Planted area	6909.48
Planted on peat	0
Conservation Area Forested	6909.48
Conservation Area Non-Forested	11.10

**Summary of field emission and Sinks**

Description	Own crop			Group			Total
Emissions Sources	tCO <sub>2</sub> e	tCO <sub>2</sub> e/ha	tCO <sub>2</sub> e/tFFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e/ha	tCO <sub>2</sub> e/tFFB	
Land conversion	65138.31	10.01	0.72	7112.16	17.61	2.28	72250.47
CO <sub>2</sub> emissions from fertilizer	2542.62	0.39	0.03	200.28	0.50	0.06	2742.90
N <sub>2</sub> O emissions from Peat	0	0	0	0	0	0	0
N <sub>2</sub> O emissions from Fertilizer	1753.57	0.27	0.02	141.27	0.35	0.05	1894.94
Fuel consumption	653.46	0.10	0.01	50.02	0.12	0.02	703.47
Peat oxidation	0	0	0	0	0	0	0
Crop sequestration	-59521.14	-9.15	-0.65	-3358.70	-8.32	-1.08	-62879.84
Sequestration in Conservation area	0	0	0	0	0	0	0
<b>Total</b>	<b>10566.92</b>	<b>1.62</b>	<b>0.12</b>	<b>4145.03</b>	<b>10.27</b>	<b>1.33</b>	<b>17041.80</b>

**Summary Oil Mill Emissions and Credits**

Remarks	tCO <sub>2</sub> e	tCO <sub>2</sub> e/t FFB
<b>Emissions sources</b>		
POME	41243.18	0.03
Fuel consumption	432.53	0
Grid electricity	0	0
<b>Credits</b>		
Export of grid electricity	0	0

Sales of PKS	-6052.68	-0.05
Sales of EFB	0	0
Total	-5620.15	-0.05

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

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

**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**

The unit certification did not carry out new developments above 2014, but the company continued to manage GHG by conducting an inventory of emission sources. They can show identification documents of activities that produce emissions for the period 2021 for Mill and Estate. This is made to estimate carbon stocks in the management area along with potential sources of emissions that can occur directly as a result of the management and plans to minimize these emissions are drawn up and implemented.

The GHG emission reduction mitigation plan developed by the company is the use of renewable fuels in the form of shells, fiber and EFB as a substitute for diesel, performing maintenance on operational equipment such as boilers on a regular basis, and doing reforestation around the factory and residential areas. Records of GHG mitigation for Estate and Mill units, for example the use of fertilizers in accordance with the dosage, routine maintenance of operational vehicles, socialization of the prohibition of burning waste, applying efficient use of electricity and integrated pest control to minimize the use of pesticides.

**7.10.3**

The company has identified pollutions and emissions sources of BPK POM for the period 2022 and 2023, such as CO<sub>2</sub> (boiler, generator, transportation), CH<sub>4</sub> (POME), hazardous waste (WTP, chemical storage), noise (machinery). The sources of pollution and emissions for the estate are listed on the identification documents and management plans for pollution sources for the period 2022, such as emissions (CO<sub>2</sub>, CO), noise, chemical waste, organic and inorganic waste, and infectious waste. The emission testing on meet with regulation i.e., generator emission accordance with environment minister's decision number 13-year 2009 appendix 1, boiler emission accordance with environment minister's decision number 07-year 2007.

<b>Status: Comply</b>
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**7.11**

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

**7.11.1**

The company has a commitment to prohibit burning in all of the company's operational activities, it has been stipulated in the No Deforestation, No Peat, no exploitation policy, published on November, 2019. The document confirms that the Wilmar group implements a no-burn policy, which does not allow burning activities during land preparation for new plantings, replanting and or all other activities.

The company has a replanting SOP listed in the agronomic guidance document and the 2015 WILMAR oil palm plantation SOP which explains that replanting is done mechanically and avoids burning. The company does not do land clearing or replanting by burning the land.

**7.11.2**

The company has also conducted regular forest and land firefighting training. This is indicated by the Minutes of the fire and emergency response simulation activities on March 11, 2022, which was attended by 30 employees.

The company has shown a fire prevention and control report for the semester 1 January to June 2022 which has been submitted to the Kubu Raya Regency Forestry and Plantation Service with proof of receipt of the PT Bumi Pratama Khatulistiwa forest and land fire prevention and control report to the Kubu Raya Regency Plantation Office on dated June 21, 2022. The report contains data on preparedness, systems, facilities, and infrastructure for controlling forest and land fires, structure of officers and data on facilities and infrastructure of PT. Bumi Pratama Khatulistiwa.

Based on the results of public consultations with the Kubu Raya Regency Plantation Office, that there has never been a forest and land fire in the company area during 2021-2022.

### 7.11.3

The company has entered into an agreement related to the prevention and control of forest and land fires through the MOU for the establishment of a Fire Care Community (MPA) with communities around the PT. Bumi Pratama Khatulistiwa Estate plantation, including Sungai Enau Village on November 9, 2020.

In an effort to prevent and anticipate fires in surrounding villages, the company always lends firefighting equipment to villages around plantations and factories during the dry season. This is evidenced, among others, by making a Minutes of the borrowing of extinguishing equipment for Sungai Enau Village in the form of equipment: 1 pump machine unit, 4 rolls of canvas hose, 1 nozzle and 1 spiral hose unit.

The socialization that has been carried out in 2022 include:

- Socialization of forest and land fire prevention with plasma harvesters of Tuah Jubata KUD on 03 May 2022 with material from PT. Bumi Pratama Khatulistiwa Estate management leaders (FO and FC)
- Socialization of forest and land fire prevention with PT. Bumi Pratama Khatulistiwa plantation workers on March 11, 2022, in the Division I office yard with the EHS Team and security guards.
- Training on fire emergency response simulation and fire blanket simulation (Emergency drill) with all workers on 22 February 2022.

Status: Comply

### 7.12

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

#### 7.12.1

The company has conducted a LUC Analysis in collaboration with AKSENTA in August 2015 for an area of 4814.96 Ha with the results of the assessment in the form of an area of Raw Liability covering an area of 23.02 Ha and a total area of Final Conservation Liability (FCL) covering an area of 0 Ha. The results of the LUCA assessment were submitted on 12 October 2015 with a communication process that lasted until the final decision issued by the RSPO ([rspocompensation@rspo.org](mailto:rspocompensation@rspo.org)) on 7 September 2016 which explained that The LUCA is marked as PASS. On 29 September 2016 the LUCA has been declared to have been endorsed by the RSPO and explained in an email ([rspocompensation@rspo.org](mailto:rspocompensation@rspo.org)) that the final liability for PT BPK is 0 Ha, no compensation plan is needed.

#### 7.12.2

The certification unit did not clear new land after November 15, 2018, the last new land clearing was carried out in 2005 to 2007 covering an area of 23.02 Ha with the type of land cover in the form of shrubs. The certification unit has identified the HCV's contained in the High Conservation Value Assessment Report at PT. Bumi Pratama Khatulistiwa, Kubu Raya Regency, Kalimantan Barat Province. Identification is carried out in collaboration with PT. Remark Asia which took place in March – July 2015. The team for preparing the HCV assessment was led by Yokyok Hadiprakarsa who a member of the Assessor Licensing Scheme is or (RSPO Approved Assessor). The scope of the study is 7003.07 Ha consisting of estate and mill covering an area of 4854.52 Ha and plasma covering an area of 2148.55 Ha. Field data collection activities were carried out on April 14-18, 2015, with the scope of social data collection covering Sungai Malaya Village, Sungai Enau Village, Kubu Padi Village, and Mega Timur Village. The peer review of the report was conducted by Machmud Thohari on February 13, 2016.

The certification unit carried out a public consultation on 17 April 2015 which was attended by 29 participants from surrounding villages such as Kubu Padi Village, Malay Timur Village, traditional leaders, Sungai Enau Village, with a total number of 29 participants. The

results of the HCV identification carried out in 2015, namely the HCV area of 13.86 Ha with the following details:

Location of HCV area	Type of HCV	Scope (Ha)	Location	Description
Padagi	6	0.01	Estate	-
Secondary forest 1	1, 3, 4	1.87	Estate	Community controlled
Secondary forest 2	1, 3, 4	1.5	Estate	Community controlled
Ditch of Gotong Royong	1, 4, 5	0.17	Estate	Community controlled
Tributaries of Malaya River	1, 4	4.23	Estate	-
Ditch of Kongsi	1, 4, 5	0.22	Estate	Community controlled
Ampening ditch	1, 4, 5	0.53	Estate	Community controlled
Landak river	1, 4	2.74	POM	included of the latest HGB
Tempayan river	1, 4	0.02	POM	included of the latest HGB
Malaya River Tributary 2	1, 4	2,57	Plasma	included the scope of audit
<b>Total (Ha)</b>		<b>13.86</b>		

There is a difference between the total HCV area data with the Basic info and Matrix Template, this is because the data included in the document is an HCV area located in the Estate, while the HCV area for plasma is outside the scope, and the HCV area in mill is included in built area (pier) which is in the mill statement area.

The total area of 8.53 Ha of HCV located in the BPK estate, an overlapping HCV area with an occupation area of 4.28 hectares was identified, namely in blocks 244, 048 and 049. There is news of agreements dated on September 13, 2019, and July 19, 2019, between PT BPK and the cultivators land in block 049, block 048 and block 244 which states that the cultivating community/ occupant does not agree to manage HCV in the area. Based on this explanation, the HCV area which is included in the 4.28 Ha occupation area is not managed by the unit certification.

### 7.12.3

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

### 7.12.4

A management and monitoring plan for 2022 is implemented for each type of HCV with the following programs:

- Signboard installation, painting and maintenance
- Water quality testing.
- Installation, addition and maintenance of riparian boundary markers
- Maintenance of traditional buildings (Padagi)
- Rehabilitation riparian tree planting and care
- Outreach and socialization to employees and the surrounding community.
- The enrichment riparian area with *ulin, pelaik, jambu jamaika, ketapang, tanjung and gelam*

### 7.12.5

The company shows evidence of improvement in the form of a 2019-2024 HCV management and monitoring plan (Garapan area). In the management & monitoring plan, it is explained that the HCV block 048 & 049 area in the form of secondary forest is socialized once a year, animal patrol & signboard maintenance is done every 6 months and the installation of warning boards is carried out in December 2019. For HCV block 244, 048, 049 in the form of a natural river that has turned into a ditch, socialization is carried out every 1 year, monitoring of water quality & monitoring of the boundaries of the spray area is carried out every 6 months. As for the evaluation of the effectiveness of the protection of the HCV function in the Garapan area, it will be carried out every 2 years.

The company has shown the results of the HCV & SIA review of PT. BPK for the 2023-2025 period involving all relevant departments based on the results of involving relevant stakeholders (village officials: village head, village secretary, BPD; community leaders; youth leaders; traditional leaders; religious leaders; plasma administrators/farmer groups; plantation and PKS employees and mothers - PKK women) covering Kuala Mandor B village, Sungai Malaya village, Mega Timur village, Sungai Enau village in June 2023.

### 7.12.6

The company has been conducting routine patrols, security is responsible for carrying out daily patrols. In addition, there is also

monitoring that is carried out every month by the foreman and a patrol report is prepared by Sustainability. If there is illegal hunting and disturbance of the HCV area, then action will be taken in the form of sanctions and legal action.

For example, RTE patrols summary results in 2022 for conservation area on Malaya riparian such as *elang bido*, *bubut*, *cekakak belukar*, *cabak maling* and *cerek krenyut*.

The company has also carried out socialization of the existence of endangered plants and animals to all employees and the surrounding community, which is shown in the Minutes of socialization document, for example the Minutes of socialization to 10 employees on December 6, 2021 at Block 210C, and to residents around PT BPK which were carried out from September and October 2021 with a total of 27 participants. All activities can prove with photos and the attendance list that attached to the document. Indirect socialization is also carried out by installing information boards and brochures warning signs related to conservation areas and the existence of endangered plants and animals that are protected in easily visible places, such as Estate entrances, Estate roads that are often crossed by the community, and other strategic places like office, and other public facilities.

#### 7.12.7

The HCV management activities that taken by the management unit for period 2021 are maintain HCV attributes (HCV boundry, sign board), HCV socialization (community and worker), maintain HCV area, regular patrols for maintain HCV security, species monitoring, enrichment in riparian. The company has also submitted a report related to the biodiversity database and monitoring & management HCV of PT BPK to the Natural Resources Conservation Center of Kalimantan Barat.

The company conducted a management review related to the management of the HCV area on 19 January 2021. The company has evaluated the results of management of river boundaries and HCV areas in 2021, among others, as input in the preparation of a management plan for the management and monitoring of HCV in 2022.

#### 7.12.8

The company did not clear land beyond 2018 without prior HCV and HCS assessments. The company has also conducted a LUC Analysis in collaboration with AKSENTA in August 2015 for an area of 4814.96 Ha with the results of the assessment in the form of an area of Raw Liability covering an area of 23.02 Ha and a total area of Final Conservation Liability (FCL) covering an area of 0 Ha. The results of the LUCA assessment were submitted on 12 October 2015 with a communication process that lasted until the final decision issued by the RSPO ([rspocompensation@rspo.org](mailto:rspocompensation@rspo.org)) on 7 September 2016 which explained that The LUCA is marked as PASS. On 29 September 2016 the LUCA has been declared to have been endorsed by the RSPO and explained in an email ([rspocompensation@rspo.org](mailto:rspocompensation@rspo.org)) that the final liability for PT BPK is 0 Ha, no compensation plan is needed.

During the recertification audit, the company showed the progress of the remediation plan, remediation plan for RaCP 2016 & RaCP 2018 submission which was emailed to RSPO on 30 November 2021, the company also showed an email on 27 April 2022 explaining PT BPK's remediation plan is complete and the plan has been forwarded to the compensation Panel for review. There is also evidence of communication between the certification unit and the RSPO regarding the status of the remediation plan dated 7 June 2022, which explains that the stages are still under review by the RSPO.

<b>Status: Comply</b>
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**3.2 Conformity Checklist of Certificate and Trademark Use**

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

### 3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of Wilmar International Ltd 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.

Wilmar International Ltd Time Bound Plan (TBP) is explained in point 1.10. Wilmar International Ltd has informed the TBP progress, MUTU has considered that Wilmar International Ltd is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Wilmar International Ltd for Indonesia update Januari 2021, Malaysia update June 2021, Africa update May 2021

MUTU has verified partial certification for un-certified unit's subsidiary of Wilmar International Ltd based on their Time Bound Plan. There are seven (7) uncertified mills and twenty (20) uncertified estates and fourteen (14) uncertified smallholders of Wilmar International Ltd. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from other sources.

MUTU Auditor has verified company partial certification and concludes that:

- There are no significant land conflicts which have not been declared above.
- The company has followed RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There are no labour disputes that are not being resolved through an agreed process.
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above.

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Wilmar Engaged Control Union to conducted assessment of compliance on the minimum requirements for multiple management units as detailed in section 5.5 of the RSPO Certification System for Principles & Criteria June 2020 for Wilmar International Limited and its subsidiaries as listed in this report below.
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)	<p>There is no replacement of primary forest since November 2005. HCV assessments are conducted prior to new planting and all new plantings are in accordance with RSPO New Planting Procedures. Below is the summary of proposed new oil planting for the group:</p> <p>Wilmar International - Benso Oil Palm Plantation (BOPP) has proposed a new planting smallholder oil palm project on a 1,477 ha communal farmland located in Trebuom in the Mpohor District of the Western Region of Ghana. The RSPO NPP summary management plan and NPP notification available in RSPO.</p> <p><a href="https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-benso-oil-palm-plantation-bopp">https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-benso-oil-palm-plantation-bopp</a></p> <p>Biase Plantation Limited (Calaro extension) has proposed new planting area located in Atan Odot village and Uwet village, Odukpani and Akamkpa Local Government Area, Cross River State, Nigeria. The summary report of Wilmar International Limited - Biase Plantation Limited (Calaro extension) completed in 2016.</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p><a href="https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-limited-biase-plantation-limited-calaro-extension">https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-limited-biase-plantation-limited-calaro-extension</a></p> <p>Eyop Industries (Oban Estate) pending clarification and clearance from government for NPP assessment.</p> <p>The internal audit documentation for uncertified areas were observed and it is confirmed that there was no replacement of primary forest.</p> <p>The group has Grievance Procedure for the implementation of Wilmar's NO Deforestation, No Peat, No Exploitation (NDPE) Policy updated version 2.0 November 2019 as link <a href="https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/grievance/grievance-sop/grievance-procedure_final.pdf?sfvrsn=7670cea2_2">https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/grievance/grievance-sop/grievance-procedure_final.pdf?sfvrsn=7670cea2_2</a></p>
2.1.3	Any new plantings since January 1 <sup>st</sup> , 2010, must comply with the RSPO New Plantings Procedure.	<p>Wilmar International - Benso Oil Palm Plantation (BOPP) has proposed a new planting smallholder oil palm project on a 1,477ha communal farmland located in Trebuom in the Mpothor District of the Western Region of Ghana. The RSPO NPP summary management plan and NPP notification available in RSPO.</p> <p><a href="https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-benso-oil-palm-plantation-bopp">https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-benso-oil-palm-plantation-bopp</a></p> <p>Biase Plantation Limited (Calaro extension) has proposed new planting area located in Atan Odot village and Uwet village, Odukpani and Akamkpa Local Government Area, Cross River State, Nigeria. The summary report of Wilmar International Limited - Biase Plantation Limited (Calaro extension) completed in 2016.</p> <p><a href="https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-limited-biase-plantation-limited-calaro-extension">https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-limited-biase-plantation-limited-calaro-extension</a></p> <p>Eyop Industries (Oban Estate) pending clarification and clearance from government for NPP assessment.</p>
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p>There is no land conflict in uncertified area also no complain or conflict observed in the RSPO Complains System.</p> <p>The group has policy for any complaint. Where employees of the Wilmar Group in confidence, raise concerns about possible corporate improprieties. This Policy ensures that arrangements are in place for independent investigations of alleged improprieties and for appropriate follow-up actions as link below; <a href="https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/grievance/grievance-sop/grievance-procedure_final.pdf?sfvrsn=7670cea2_2">https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/grievance/grievance-sop/grievance-procedure_final.pdf?sfvrsn=7670cea2_2</a></p>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p><a href="https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/wilmar-whistleblowing-policy.pdf">international.com/docs/default-source/default-document-library/sustainability/policies/wilmar-whistleblowing-policy.pdf</a></p> <p>This grievance procedure is open to all stakeholders, though is primarily focused on receiving grievances from external sources. For workers and local communities with specific local level grievances, each of our plantation and mill operational units have site specific complaints and grievances procedures, which have been a requirement of the RSPO Principles and Criteria since 2005. These site-specific procedures are accessible by workers and to any other stakeholder. Grievances raised through the site-specific procedures have a separate resolution process - Consultation and Communication Procedure. The SOP also available in website link as below; <a href="https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/grievance/grievance-sop/grievance-procedure_final.pdf?sfvrsn=7670cea2_2">https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/grievance/grievance-sop/grievance-procedure_final.pdf?sfvrsn=7670cea2_2</a></p> <p>The internal audit documentation for uncertified areas were observed and it is confirmed that there were no land conflicts.</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p>The group has Dispute &amp; Resolution Procedure Doc No PPB/RSPO 6.3 (2.2)/(1) revision date 25 Oct 2018 purpose to facilitate a dispute and grievances resolution process between the management, growers and miller and employees, local communities and other affected external parties.</p> <p>The internal audit documentation for uncertified areas were observed and it is confirmed that there were no labour disputes.</p>
2.1.6	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1 (it has changed be Criterion 4.2 in P&C 2018).	<p>The internal audit procedure doc no PBB/PRO 12/(03)/0212 revision 23 March 2020 (Rev 4) conducted periodically for uncertified and certified area and result of internal audit for uncertified areas were observed and it is confirmed that all laws are in compliance.</p> <p>Sample internal audit has been reviewed for: Laba Utama Estate. Assessment has been conducted on April 2021. Noted that there is no non-compliance during the assessment as required by uncertified management unit.</p> <p>PT Sarana Titian Permata. The assessment conducted on Jan 2021. Noted that pending on HGU process. Target completion by 2023.</p> <p>PT Agronusa Investama</p>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>Assessment conducted in February 2021. Pending on the HGU process and target completion by 2022.</p> <p>Trebuom Adum Smallholder Oil Palm Project Assessment conducted in July 2021 with no non-compliance as per uncertified management unit requirements.</p> <p>Calaro Estate. Noted that the assessment has been conducted in May 2021. Noted that there are no identified of noncompliance in the management unit assessed.</p> <p>Sampled internal audit for Suburmas Plantation Sdn Bhd, Jebawang Sdn Bhd, Eyop Industries Limited (EIL) and Biase Plantation Limited (BPL). There has no public comment in website RSPO regarding uncertified area.</p>



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

#### 3.4.1. Identification of Non-conformity at Surveillance -4 and Re-Certification

NCR No.	:	2022.01	Issued by	:	Radytio Puspanjana
Date Issued	:	1 July 2022	Time Limit	:	Next Surveillance
NC Grade	:	Minor	Date of Closing	:	7 July 2023
Standard Ref. & Requirement	:	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.			

**Evidence observed (filled by auditor):**

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. The first social impact assessment was carried out in May 2015 by Remark Asia as a follow-up to the results of the assessment, there are several recommendations/matrixes for the management plan and monitoring of social impacts, including:

- Company relationships and interactions.
- Plasma plantation certificate.
- CSR and surrounding village development programs.
- Conflict handling
- Grievance and complaint mechanism.

As an effort to improve and pay attention to the latest situation, in 2021 the company will carry out a Social Impact Review and Update, i due to the dynamic social situation and the seriousness of the company to build and maintain the company's sustainability. The SIA review includes:

- Job opportunities and business opportunities.
- Consultation and communication.
- Perception of the company.
- Occupational Health and Safety.
- Employee facilities and benefits

As a follow-up to the review, the company then developed a social management and monitoring plan, namely:

Impact from External	Impact from Internal
- Employment Opportunity	- Job opportunities.
- Consultation and communication	- Consultation and communication
- Perception of the company	

In the SIA process carried out in 2021, the company has involved various stakeholders, however:

- External stakeholders involved in the preparation of the management plan and social monitoring are still limited to a few affected stakeholders such as Mega Timur Village (head of village and community leaders), Sungai Enau Village (head of village, local contractors, secretary of village, Village Deliberation Agency), Kuala Mandor B Village (Chairman of Village Deliberation Agency) and Sungai Malaya Village (head of village and community leaders) carried out in October 2021, not yet paying attention to the widely affected parties, such as women, the government, plasma farmers, those who use nearby water resources, and occupant.
- Internal stakeholders have not been directly involved in the management plan and social monitoring including by paying attention to the wider representation of workers such as local workers, migrants, women, new workers including casual workers.

Furthermore, the results of the document review and interviews with management and stakeholders (internal and external) revealed

that the company had carried out social management and monitoring, which was carried out partially by the relevant departments, so that the reports on activities carried out were not comprehensive and integrated, for example:

- Employment and OSH impacts are managed by PGA and EHS.
- Environmental Impact and HCV managed by EHS and Conservation.
- External Impact (legal and social) managed by SSL (Social, Security and License).
- Plantation and POM operational activities are managed by the plantation and POM operational team.

By being carried out partially by the relevant departments, there are potential impacts that arise but are not fully documented and integrated on several issues that are currently developing or in the future, for example, but not limited to:

- Attention related to labour issues (employee status, low worker productivity, use of casual workers, wage issues).
- Attention to the issue of fruit theft / FFB.
- Attention related to legality issues and land conflicts (HGU validity period, land status after HGU expires).
- Attention related to the issue of water pollution and HCV being occupant area.
- Concerns related to flood issues, CSR dissatisfaction.
- Attention to the impact of operational activities on best cultivation and processing practices by companies, both plantations and mills.

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

The social impact management and monitoring plan not developed with the participation of widely affected stakeholders so that there are several issues didn't identify and stated in the SIA Review report including the social management and social monitoring which are integrated by involving various relevant departments.

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

Coordination between each department has not yet been carried out because they do not yet have an understanding regarding SIA reporting.

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

Create an SIA report involving an integrated team

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

Training Review SIA

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

The company has shown evidence of improvement as follows:

- The company has conducted SIA review and evaluation training in the Kalimantan Barat Estate Region on 24-26 May 2023 which was attended by all relevant departments (HR/PGA, SSL, EHS, DC, Plasma Manager).
- The company has shown the results of the SIA review of PT. BPK for the 2023-2025 period involving all relevant departments based on the results of involving relevant stakeholders (village officials: village head, village secretary, BPD; community leaders; youth leaders; traditional leaders; religious leaders; plasma administrators/farmer groups; plantation and PKS employees and mothers -PKK women) covering Kuala Mandor B village, Sungai Malaya village, Mega Timur village, Sungai Enau village in June 2023.
- RKS and RPS review related to external issues, including:
  - Handling dust
  - Handling flood issues
  - Realization of CSR
  - Claim land
  - Arable land
  - Certification of SHM plasma cooperative Mekar Lestari
  - The issue of fruit theft

Based on the above evidence, NC 2022.01 can be fulfilled (closed) and an observation will be carried out

**Follow up on next audit** (filled by auditor):

Verified by

:

I Wayan Sudi Antara

<b>NCR No.</b>	: 2022.02	<b>Issued by</b>	: Yudhi Yuniarto Tallutondok
<b>Date Issued</b>	: 1 July 2022	<b>Time Limit</b>	: Next Surveillance
<b>NC Grade</b>	: Minor	<b>Date of Closing</b>	: 7 July 2023
<b>Standard Ref. &amp; Requirement</b>	<b>6.2.7</b> <b>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</b>		
<b>Evidence observed (filled by auditor):</b>  <p>Based on document review show that the certification unit has determined the type of permanent work by referring to the GAPKI Decree No. SK/002/PPG/II/2013 concerning the flow of work implementation processes in the oil palm plantation business sector. In the attachment to the decree, it is explained that the work of harvesting and processing FFB into CPO is the main activity. Based on field observation and interviews with harvester in Phase 3 Block 127, it was found that casual workers have been working since October 1, 2021. During the audit process, the certification unit was able to show a list of plantation employees for the period of June 2022, from the list of employees it was found that there were 35 harvest employees. with the status of casual workers who have started working since 2021 until now, for example employees with work agreements as follows:</p> <ol style="list-style-type: none"> <li>1. SPK dated October 1, 2021 for employees with the initials AB.</li> <li>2. SPK dated October 23, 2021 for employees with the initials MW.</li> <li>3. SPK dated October 1, 2021 for employees with the initials MB.</li> <li>4. SPK dated October 1, 2021 for employees with the initials MF.</li> <li>5. SPK dated December 21, 2021 for employees with the initials SD.</li> <li>6. SPK dated September 1, 2021 for employees with the initials DN.</li> </ol>			
<b>Non-Conformance Description (filled by auditor):</b> <p>The certification unit has not been able to show evidence that the main work has been done by permanent workers</p>			
<b>Root Cause Analysis (filled by organization audited):</b> <p>The process of reviewing and submitting employees to be appointed from casual daily worker (BHL) status to regular daily employees (KHT)</p>			
<b>Correction (filled by organization audited):</b> <p>Appoint casual daily worker (BHL) status to regular daily employees (KHT) specifically for harvesters</p>			
<b>Corrective Action (filled by organization audited):</b> <p>Each new employee recruitment is applied by employees with a 3-month probationary period.</p>			
<b>Assessor Evaluation and Conclusion (filled by auditor):</b> <p>Verify July 07, 2023          In the ASA-1.1 activities carried out, the Company returned the results of the root cause analysis, preventive actions and evidence of improvement in the form of:</p> <ol style="list-style-type: none"> <li>1. Data on casual daily worker (BHL) employees of PT Bumi Pratama Khatulistiwa for the period November 22, 2022</li> <li>2. Recap of Submission of Harvester Employees from casual daily worker (BHL) to regular daily employees (KHT) for the period of 27 March 2023</li> </ol> <p>Based on this explanation, the non-conformities are declared to have been fulfilled</p>			
<b>Follow up on next audit (filled by auditor):</b>			
<b>Verified by</b>	: Rizki Tanaya		

<b>NCR No.</b>	: 2022.03	<b>Issued by</b>	: Yudhi Yuniarto Tallutondok
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<b>Date Issued</b>	: 1 July 2022	<b>Time Limit</b>	: Next Surveillance
<b>NC Grade</b>	: Minor	<b>Date of Closing</b>	: 7 July 2023
<b>Standard Ref. &amp; Requirement</b>	<b>6.7.4</b> <b>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</b>		
<b>Evidence observed (filled by auditor):</b>  <p>Based on verification document and interviews with management and workers both casual daily workers and permanent worker it is known that all workers have received work accident insurance through <i>BPJS Ketenagakerjaan</i>, this is proven by being able to show proof of <i>BPJS Ketenagakerjaan</i> payments for casual daily worker and permanent worker.</p> <p>Meanwhile, health services for permanent worker have been included in the <i>BPJS Kesehatan</i> program. Meanwhile, for the casual daily worker, certification unit show a letter from <i>BPJS Kesehatan</i> No. 2284/IV-02/1216 dated December 20, 2016, concerning the Directives of Freelancing Casual Daily Workers which explains that:</p> <ol style="list-style-type: none"> <li>Casual daily workers cannot be grouped into wage-earning workers whose payment of health insurance contributions is 5% of the salary or wages received regularly every month where 4% is paid by the employer and 1% is paid by the worker.</li> <li>If a business entity wishes to include casual daily workers (BHL) into <i>BPJS Kesehatan</i>, the health insurance guarantee is in accordance with the provisions as non-wage workers.</li> </ol> <p>Based on verification document of <i>BPJS Kesehatan</i> payment documents are known that the certification unit only includes Permanent Worker, for example</p> <ol style="list-style-type: none"> <li>Payment proof of <i>BPJS Kesehatan</i> for estate employees for the March 2022 period which was paid on April 8, 2022 for 546 employees while the number of employees is 668 employees so there is a difference of 122 employees who are not paid.</li> <li>Payment proof of <i>BPJS Kesehatan</i> for estate employees for the April 2022 period which was paid on April 8, 2022 for 546 employees while the number of employees is 663 employees so there is a difference of 117 employees who are not paid.</li> <li>Payment proof of <i>BPJS Kesehatan</i> for estate employees for the May 2022 period which was paid on May 11, 2022 for 545 employees while the number of employees is 662 employees so there is a difference of 117 employees who are not paid.</li> <li>Payment proof of <i>BPJS Kesehatan</i> for estate employees for the June 2022 period which was paid on June 10, 2022 for 543 employees while the number of employees is 668 employees so there is a difference of 125 employees who are not paid.</li> </ol> <p>Based on interviews with management and casual daily workers if there are workers who are sick can be treated at the Company Clinic for free. However, the certification unit has not been able to explain the treatment if the patient requires further action if it cannot be handled at the certification unit clinic.</p>			
<b>Non-Conformance Description (filled by auditor):</b> <p>The certification unit has not been able to show evidence that all workers have been provided with health services that are equal to all employees.</p>			
<b>Root Cause Analysis (filled by organization audited):</b> <p>Referring to the reply letter from <i>BPJS Health</i> that casual daily worker (BHL) is not required to be registered with <i>BPJS Health</i></p>			
<b>Correction (filled by organization audited):</b> <p>The management of PT BPK issued an internal memorandum regarding casual daily worker (BHL) employee health service facilities</p>			
<b>Corrective Action (filled by organization audited):</b> <p>Each new employee recruitment is implemented by employees with a probationary period of 3 months with full social security facilities (same as regular daily employees (KHT))</p>			
<b>Assessor Evaluation and Conclusion (filled by auditor):</b> <p>Verify July 07, 2023          During the ASA-1.1 activities carried out, the Company returned the results of the root cause analysis, preventive actions and</p>			

evidence of improvement in the form of:

1. Letter from BPJS Health No. 2284/IV-02/2016 Dated December 20, 2016 regarding directives regarding casual daily workers (BHL).
2. Internal Memorandum No. 419/GM-MI/XII/2022 Dated December 30, 2022 regarding Health Service Facilities for Freelance Employees.

Based on this explanation, the discrepancy is declared to have been fulfilled

**Follow up on next audit** *(filled by auditor):*

<b>Verified by</b>	<b>:</b>	<b>Rizki Tanaya</b>
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**3.4.2. Identification of Non-conformity at Surveillance-1.1**

<b>NCR No.</b>	<b>: 2023.01</b>	<b>Issued by</b>	<b>: Rizki Tanaya</b>			
<b>Date Issued</b>	<b>: 07 July 2023</b>	<b>Time Limit</b>	<b>: 05 October 2023</b>			
<b>NC Grade</b>	<b>: Major</b>	<b>Date of Closing</b>	<b>: 05 October 2023</b>			
<b>Standard Ref. &amp; Requirement</b>	<b>: 6.2.2</b> <b>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.</b>					
<b>Evidence observed (filled by auditor):</b> <ul style="list-style-type: none"> <li>From the results of the auditor's public consultation with representatives of Sungai Enau Village, information was obtained that in the BPK plantation there were still workers who were assisted by family members who were not company employees. Then, based on the auditor's field visit during the harvesting activities in Block 115B Division 2 phase 2, it was found that 1 person with the initials MRN (harvester's wife) from the worker with the initials SR who was helping pick up loose fruit. Based on direct interviews, it is known that the person is not an employee of the company.</li> <li>From the verification of the PT Bumi Pratama Khatulistiwa Plantation Employee List for the July 2023 period, there were no personnel with the initials MRN registered as employees at PT Bumi Pratama Khatulistiwa Estate. The company also cannot prove that these personnel are employees of the BPK Plantation.</li> <li>Law of the Republic of Indonesia No. 13 of 2003 in article 50 and Government Regulation of the Republic of Indonesia No. 35 of 2021 in article 2 paragraph 1 states that employment relations occur because of an employment agreement between employers and workers/labourers.</li> </ul>						
<b>Non-Conformance Description (filled by auditor):</b>  Based on this evidence, it is concluded that there are still people who work in the company's operational environment without having an agreed work agreement and this is not in accordance with applicable regulations.						
<b>Root Cause Analysis (filled by organization audited):</b> Lack of socialization, supervision, and application of strict sanctions in the field in terms of implementing company policies regarding the prohibition of harvesters bringing other people to help work.						
<b>Correction (filled by organization audited):</b> Give strict sanctions to employees who bring other people to help work.						
<b>Corrective Action (filled by organization audited):</b> <ol style="list-style-type: none"> <li>Re-socialize harvesters and other employees regarding Company Policy regarding the prohibition of harvesters and other employees bringing other people to help work.</li> <li>Installing sign boards at every employee and office gathering point regarding Company Policy regarding the prohibition of harvesters and other employees bringing other people to help work.</li> <li>Field Officers, Field Conductors and Foremen ensure that no one else works at PT. Bumi Pratama Khatulistiwa in addition to the workforce registered with the company by means of Field Officers, Field Conductors and Foremen carry out daily supervision and monitoring using the standard format provided. The results are reported to the Head of the Unit to be given the application of strict sanctions.</li> </ol>						
<b>Assessor Evaluation and Conclusion (filled by auditor):</b>  <b>Verification 05 October 2023</b> <ol style="list-style-type: none"> <li>The company shows evidence of improvement, including:</li> <li>Minutes of Socialization on the Use of PPE and the Prohibition of Bringing employees who are not registered with the</li> </ol>						

company, Socialization of Company Regulations and Occupational Health and Safety dated July 8, 2023, attended by 106 attendances.

3. Monitoring Form for Employee Attendance, Complete PPE and Not Employing Minors for the July 2023 period in Phases 1, 2, 3 and 4.
4. Installing a sign board prohibiting the employment of minors at PT Bumi Pratama Khatulistiwa.
5. Warning letters to employees with IDs BX/BPK/0806/401 and BX/BP/0214/1441 dated July 10, 2023.

**Conclusion 05 October 2023**

Based on the explanation above, it is concluded that the non-compliance is declared fulfilled and will be verified again during the next visit.

**Follow up on next audit** (filled by auditor):

**Verified by** : Rizki Tanaya

<b>NCR No.</b>	: 2023.02	<b>Issued by</b>	: Sentot Adi Subandono
<b>Date Issued</b>	: 07 July 2023	<b>Time Limit</b>	: ASA-1.2
<b>NC Grade</b>	: Minor	<b>Date of Closing</b>	:
<b>Standard Ref. &amp; Requirement</b>	<b>6.7.2</b> <b>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</b>		
<b>Evidence observed</b> (filled by auditor):  The results of field observations at BPK POM found that there were several contents of the first aid kit that had expired, as follows: <ul style="list-style-type: none"> <li>• Pos Security: Povidone Iodin expires in May 2020.</li> <li>• Workshop: Povidone Iodine expires October 2020, Rohto expires April 2023, and Otsu Water Injection expires January 22, 2022.</li> <li>• TPS LB3: Povidone Iodine expires in May 2020 and Rohto expires in April 2023</li> <li>• There is a monitoring form for the contents of the first aid kit updated in June 2023 in the first aid kit, but the contents of the first aid kit are not identified. Then, the minutes of replacing the contents of the first aid kit which expired on July 6, 2023, were also shown at the security, workshop, and TPS LB3.</li> </ul>			
<b>Non-Conformance Description</b> (filled by auditor):  Based on this evidence, it is known that there are some expired first aid kits in the workplace.			
<b>Root Cause Analysis</b> (filled by organization audited):			
<b>Correction</b> (filled by organization audited):			
<b>Corrective Action</b> (filled by organization audited):			
<b>Assessor Evaluation and Conclusion</b> (filled by auditor):			

**Follow up on next audit** (filled by auditor):

**Verified by** :

<b>NCR No.</b>	<b>2023.03</b>	<b>Issued by</b>	<b>Hasiholan Sihombing / I Wayan Sudi Antara</b>
<b>Date Issued</b>	<b>07 July 2023</b>	<b>Time Limit</b>	<b>ASA 1.2</b>
<b>NC Grade</b>	<b>Minor</b>	<b>Date of Closing</b>	
<b>Standard Ref. &amp; Requirement</b>	<b>7.8.3</b> <b>Mill liquid waste is managed in accordance with applicable regulations. The quality of disposed of Mill liquid waste, especially BOD (Biochemical Oxygen Demand) is regularly monitored according to applicable regulations.</b>		

**Evidence observed** (filled by auditor):

The results of document verification, field observations and interviews revealed:

- The company has a permit for disposing of liquid waste into water bodies based on a letter from the Investment and One-Stop Services Office of Kubu Raya Regency Number 503/008/DPMPTSP-E/IPLC/2017 dated 23 November 2017.
- Based on field observations in WWTP ponds, it is known that BPK Mill has 9 WWTP pools with a total volume of 80,690 m3. However, Pond 2 is not functioning (it is used as a POME sludge dump).
- The company has a Sparring Tool (installed in 2020) as a fulfilment of the obligation of the Minister of Environment and Forestry No. P.93/MENLHK/SETJEN/KUM.1/8/2018 Concerning Continuous and Network Monitoring of Wastewater Quality for Businesses and/or Activities.
- The results of public consultations with environmental services of Kubu Raya Regency obtained information that previously there had been complaints from the public regarding wastewater pollution from BPK Mill to environmental services of Kubu Raya Regency.
- Then from the results of field observations at the waste water treatment plant BPK Mill pool on July 4, 2023, data on the quality of liquid waste discharged into water bodies using monitoring sparring devices obtained the following data:
  - COD: 636.5 mg/L (COD Quality Standard based on PermenLH No. 5 of 2014 is 350 mg/L)
  - TSS: 653 mg/L (TSS Quality Standard based on PermenLH No. 5 of 2014 is 250 mg/L)
- Based on the results of lab tests accredited by KAN, for example the quality of WWTP wastewater for the June 2023 period, the following data is known:
  - COD: 340 mg/L (COD Quality Standard based on PermenLH No. 5 of 2014 is 350 mg/L)
  - TSS: 220 mg/L (TSS Quality Standard based on PermenLH No. 5 of 2014 is 250 mg/L)

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

Based on the explanation above, it is known that there are results of monitoring the quality of BPK Mill liquid waste using sparring tools that are discharged into water bodies that exceed the quality standards based on applicable regulations (PermenLH No. 5 of 2014) where this is different from the results of laboratory tests that are accredited by KAN.

**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):

<i>Follow up on next audit (filled by auditor):</i>	
<b>Verified by</b>	:

### 3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	7.3.1	<p><b>There is a waste management plan that is documented and implemented in accordance with applicable laws and regulations, including reduction, recycling, reuse and disposal, based on the characteristics of poisons (toxicity) and other hazards.</b></p> <ul style="list-style-type: none"> <li>The company has an SOP for the utilization of solid waste (SOP/BPK-EHS/012/2013), which includes the utilization of empty stubs.</li> <li>The management of jangkoks carried out by the company is by pressing them to be used as boiler fuel, sent to farmers, and sold to other parties. However, the results of verification of the utilization of empty fruit tree data, obtained information on closed stock: In 2020 it was 44,801.78 Tons; In 2021 it will be 52,575.32 tons; In 2022 it will be 51,796.98 tons; until June 2023 amounted to 54,040.05 tons (increasing trend).</li> <li>Based on observations at POM, there are quite high piles of EFB.</li> </ul> <p>Companies are encouraged to improve management of empty fruit bunches, including reduction, recycling, reuse and disposal to mitigate pollution considering that the location of the PKS Mill is close to the Landak River.</p>
2	7.3.2	<p><b>There is evidence of waste disposal according to procedures fully understood by workers and managers.</b></p> <p>Based on observations at the clinic and interviews with the PIC of the clinic, it is known that medical waste has been stored in plastic bins and there is no information on how long it has been stored in the clinic. Companies have the opportunity to ensure proper disposal of medical waste and increase employee understanding of medical waste disposal procedures.</p>

### 3.4.4. Noteworthy Positive Components

No	Description
1	Commitment to implement the principles of sustainable oil palm plantation management.
2	The company has competent human resources in their respective fields.
3	The company no longer uses pesticides with the active ingredient paraquat
4	Presentation of documents is quite good



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

Public Issues (Institution/ NGO/Community)	Auditor Verification
<b>Village Official of Sungai Malaya Village and Sungai Enau Village.</b> <ul style="list-style-type: none"> <li>PT BPK absorbs quite a lot of workers from the village.</li> <li>PT BPK routinely provides assistance to villages in several forms, such as road construction, assistance for commemorating religious holidays, and commemorating independence events through proposals submitted to PT BPK from the village.</li> <li>Discussion of social programs has not been fully prepared with the community or village officials, but uses a proposal submitted to PT BPK.</li> <li>Communication with the village is quite good.</li> <li>There are workers who bring other people to help work at the company, such as helping pick up loose fruits even though the person concerned is not an employee at the company.</li> </ul>	<p>Issues related to non-worker loose fruits picker working at the company, has become a 2023.01 non-conformity.</p>
<b>Previous Land Owner and also plasma owner of KUD Mekar Lestari</b> <ul style="list-style-type: none"> <li>Compensation for land surrender to PT BPK has been paid in accordance with the agreement covering an area of 41.36 ha.</li> <li>There were no complaints during the process and payment of land handover compensation.</li> <li>Smooth plasma payments.</li> <li>Payment for FFB uses the price of the Plantation Service.</li> </ul>	<p>There are no issues related to the company.</p>
<b>Worker Union at Mill (Serikat Buruh Seluruh Indonesia)</b> <ul style="list-style-type: none"> <li>Currently, there are 120 members.</li> <li>The certification unit has implemented the District Minimum Wage.</li> <li>The certification unit lends a place to worker union which is used as an office. Audiences with the certification unit are conducted monthly. The certification unit is quite responsive regarding employee complaints.</li> <li>The certification unit has distributed PPE to workers and has carried out periodic and special health checks for workers handling high risk such as work stations with high noise risk such as machine room and sterilizer stations.</li> </ul>	<p>There are no negative issues related to the company, and verification has been carried out in the report.</p>
<b>Worker Union at Estate (Serikat Buruh Kebun Bersatu)</b> <ul style="list-style-type: none"> <li>Currently, there are 319 members period June 2023.</li> <li>The certification unit has implemented the District Minimum Wage.</li> <li>The certification unit lends a place to worker union which is used as an office. Audiences with the certification unit are</li> </ul>	<p>There are no negative issues related to the company, and verification has been carried out in the report.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>conducted monthly. The certification unit is quite responsive regarding employee complaints.</p> <ul style="list-style-type: none"> <li>The certification unit has distributed PPE to workers and has carried out periodic and special health checks for workers handling pesticides and manuring.</li> </ul>	
<p><b>Gender Committee Representative (PT. Bumi Pratama Khatulistiwa Mill)</b></p> <ul style="list-style-type: none"> <li>During 2021 to 2022 there were no reports of sexual harassment of female workers</li> <li>There has been socialization regarding the rights of women workers, including menstrual leave, the right to breastfeed children at work, pregnancy check-ups,</li> <li>There is no discrimination in employment opportunities and promotion opportunities for female workers.</li> <li>The gender committee routinely identifies pregnant and lactating women, to ensure that female workers can work properly.</li> </ul>	<p>In general, there are no negative issues that need further clarification</p>
<p><b>Gender Committee Representative (PT. Bumi Pratama Khatulistiwa Estate)</b></p> <ul style="list-style-type: none"> <li>During 2021 to 2022 there were no reports of sexual harassment of female workers</li> <li>There has been socialization regarding the rights of women workers, including menstrual leave, the right to breastfeed children at work, pregnancy check-ups,</li> <li>There is no discrimination in employment opportunities and promotion opportunities for female workers.</li> <li>The gender committee routinely identifies pregnant and lactating women, to ensure that female workers can work properly.</li> </ul>	<p>In general, there are no negative issues that need further clarification</p>
<p><b>CV Bumi Sriwijaya Utama – Local Contractor</b></p> <ul style="list-style-type: none"> <li>The agreement has been agreed by both parties since 2017.</li> <li>CV Bumi Sriwijaya Utama is a transporter company which carry a EFB from POM to Village.</li> <li>Contractor provides PPE to workers.</li> <li>There were no complaints regarding payments and payments in accordance with the work agreement.</li> <li>The contractor has also provided work accident insurance to all employees.</li> </ul>	<p>There is no negative issue related to local contractor.</p>
<p><b>CV Tramuk Jaya Barokah – Local Contractor</b></p> <ul style="list-style-type: none"> <li>Cooperate in contracts to build harvest bridges.</li> <li>The owner of the contractor is from Sungai Malaya Village (village near the company)</li> <li>Feel a positive impact with the company.</li> <li>Smooth payments and no problems.</li> </ul>	<p>There is no negative issue that need further verification.</p>



Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> <li>Coordination with Field Officers at PT BPK was smooth and there were no problems.</li> <li>Contractor ownership is carried out by tender so that it is considered very fair in terms of awarding cooperation contracts.</li> </ul>	
<b>CV Ingat Budi – FFB Supplier</b> <ul style="list-style-type: none"> <li>The owner of the contractor is from Sungai Enau Village</li> <li>Since 2021, they have collaborated to supply FFB to BPK POM</li> <li>The FFB obtained came from the FFB of the people of Sungai Enau Village, Retok Village, Kubu Padi Village, Padi Jaya Village.</li> <li>On average, about 400 tons of FFB are sent to BPK POM every week.</li> <li>Prices are based on CPO market prices and are subject to change, however, suppliers are immediately informed via WhatsApp.</li> <li>Smooth payments and no problems.</li> <li>Good communication with the company.</li> </ul>	<p>There is no negative issue that need further verification.</p>
<b>CV Mekar Jaya – FFB Supplier</b> <ul style="list-style-type: none"> <li>Have been working together to supply FFB to BPK POM for a long time.</li> <li>Becoming one of the biggest FFB suppliers to BPK POM.</li> <li>Smooth payments and no problems.</li> <li>Prices are based on CPO market prices and are subject to change, however, suppliers are immediately informed via WhatsApp.</li> <li>Good communication with the company.</li> <li>Feeling a positive impact since working with the company.</li> </ul>	<p>There is no negative issue that need further verification.</p>
<b>Issue on the Betahita.id website on 25 February 2022.</b> <ul style="list-style-type: none"> <li>Ditch pollution around the plantation.</li> <li>Use of paraquats.</li> <li>The sprayer does not use special clothing (appropriate PPE) when spraying.</li> <li>There is no clean water available to clean oneself after spraying. Sprayers bathe in contaminated ditches.</li> </ul>	<ul style="list-style-type: none"> <li>Based on field observations of circle path activities, pesticide warehouses, and interviews with workers found that there was no use of paraquat in weed eradication.</li> <li>Based on field observations in circle path activities, all workers use PPE aprons, special spray masks, face shields, rubber gloves, and boots.</li> <li>Based on field observations revealed that there is a rinse house for sprayers to clean themselves and post-spray working tools and to change into clean clothes. This is in line with the results of interviews with sprayers who informed them that after work they clean themselves, work tools, and PPE, and also change into clean clothes.</li> </ul>
<b>RSPO Complaint Reference No. RSPO/2022/17/LSL on 26 December 2022 with the summary of Complaint related to:</b> <ul style="list-style-type: none"> <li>The Complainants allege that the wages do not follow the <i>Upah Minimum Kabupaten</i> (UMK) and the wages were reduced without any explanation provided to the workers;</li> </ul>	<p><b><u>The Wages do not follow the <i>Upah Minimum Kabupaten</i> (UMK) and wages were reducing without any explanation</u></b> Based on document salary verification and interview with union worker and worker on estate and mill that it is known that they</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> <li>The Complainants allege that there is no optimal health services and safety provided to the workers. The workers are forced to work when they are ill, no regular health checks are done for workers (especially for female workers where the majority of them work in the fertilizer division) and there is no clean water provided for workers who live in the workers' housing.</li> <li>The Complainants further allege that there is an indication that <i>Badan Penyelenggara Jaminan Sosial</i> (BPJS) is not registered for workers in the fertilizer division who have been working for more than a year.</li> <li>The Complainants allege that there is unilateral termination of workers and that the rights of the workers who were laid off were not honoured.</li> <li>Further, the Complainants allege that the Respondent did not convert workers who have been working for a period of more than 5 years to permanent workers, instead their working days were reduced.</li> <li>The Complainants allege that workers who ask questions and/or take action to demand for their rights as a worker were intimidated by the Respondent.</li> <li>The Complainants allege that the workers' rights (as mandated by the law - <i>Natura</i>) to be provided with provisions/goods such as rice is lost and that the workers will only be provided with the same if they reach a specified target at work.</li> <li>The Complainants allege that the Respondent has not been transparent in determining Lembaga Kerjasama (LKS) bipartite.</li> <li>The Complainants allege that the work of picking loose FFB, pruning and gathering fronds has become the responsibility of the harvesting workers; and</li> <li>The Complainants further allege that the Respondent is not transparent on the number of FFB delivered to the factory/mill and that the weighing of FFB should be done in the plantation before it is brought to the factory/mill, but this is not the case.</li> </ul>	<p>have received according to the minimum wage set by the local government</p> <p><b><u>No optimal health services and safety provide to worker, force to work when they are ill, no regular health checks for female workers in the fertilizer division.</u></b></p> <p>Based on document health check and interview worker in field, that inform health checks carried out regularly especially female worker in the fertilizer division and it has been explain in indicator 7.2.10</p> <p><b><u>BPJS not registered for workers in the fertilizer division.</u></b></p> <p>Based on a review of the BPJS participant list documents and Proof of Payment for May 2023 and interviews with fertilizer workers, it was found that all fertilizer workers were registered and paid social and health insurance contributions by the company through the BPJS Employment and Health BPJS programs.</p> <p><b><u>Unilateral termination of workers and that the rights of the workers who were laid off were not honoured.</u></b></p> <p>Based on a review of layoff documents and interviews with unions, the company has never carried out a unilateral layoff and has not respected the rights of these workers. As for what happened, the worker resigned and/or made mistakes such as being absent from work and was reprimanded 3 times by the company and got his/her rights as stipulated in the laws and regulations.</p> <p><b><u>Not convert workers who have been working for a period of more than 5 years to permanent workers, instead their working days were reduced.</u></b></p> <p>Based on document verification and based on interviews with spray and fertilization workers and also worker union, it was found that the company has appointed all workers who were previously casual daily workers to become permanent workers in 2023. So, in ASA-1.1 assessment known that all workers at PT Bumi Pratama Khatulistiwa are permanent workers both on the plantation and at the mill.</p> <ul style="list-style-type: none"> <li><b><u>Workers who ask questions and/or take action to demand for their rights as a worker were intimidated.</u></b></li> <li><b><u>The workers' rights (as mandated by the law - <i>Natura</i>) to be provided with provisions/goods such as rice is lost and that the workers will only be provided with the same if they reach a specified target at work.</u></b></li> </ul> <p>Based interview with management and worker union, provided with provisions is included in kind benefit.</p> <p><b><u>Not been transparent in determining Lembaga Kerjasama (LKS) bipartite</u></b></p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
	<p>Based on interviews with trade unions, information was found that involvement in the Bipartite Organization was transparent by involving trade unions in the bipartite structure.</p> <p><b><u>The work of picking loose FFB, pruning and gathering fronds has become the responsibility of the harvesting workers.</u></b></p> <p>Based on interviews with harvesters and management representatives, information was found that the work of picking loose FFB has been provided with special personnel from the upkeep section and fulfillment is gradual and continues to be carried out so that the proportion is proportional to the number of harvesters, while pruning and gathering fronds is the responsibility of the harvester because it is fixed area for harvesters.</p> <p><b><u>Not transparent on the number of FFB delivered to the factory/mill and that the weighing of FFB should be done in the plantation before it is brought to the factory/mill but this is not the case.</u></b></p> <p>Based interview with management that always transparent about number of FFB and the weighing of FFB.</p>
<p><b>Issue from Pontianak Post (online news) on 19 March 2023.</b></p> <p>In the online news, it was informed that in March 2023 there was a mass action from several KUD Mekar Lestari farmers who made three demands. First, the purchase of plasma fresh fruit bunches (FFB) is carried out according to the price set by the Kalimantan Barat Plantation Agency. Second, the management of PT BPK is obliged to carry out the conversion. Third, farmers request the formation of an independent investigative audit team on the implementation of plantation development from the beginning to the settlement of credit.</p>	<p>Based on interviews with the management of PT BPK, they were informed that the news was true. It was explained that for the first demand, it had been agreed that the FFB price from KUD Mekar Lestari used the FFB price set by the local government even though KUD Mekar Lestari had actually paid off and had been managed independently by each farmer.</p> <p>For the second demand, the Company explained that so far there has been no deduction for replanting funds as stated in the news. However, the company has offered assistance so that the Cooperative obtains funds from the government for the implementation of replanting activities and there have been several farmer groups within the Mekar Lestari KUD who have carried out replanting with funds from the government. The company explained that there was an internal conflict within the Cooperative, so the company is still communicating intensely to related parties so that the replanting activities receive funding from the government.</p> <p>For the third demand, the company does not mind if an independent investigation is carried out because basically the land has been managed by the Cooperative and currently it is only cooperating in terms of buying and selling FFB to PT BPK.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>Chairman of KUD Mekar Lestari</b></p> <ul style="list-style-type: none"> <li>Formerly developed by the Company, but now it has been paid off and the land is managed by individual Farmers and Cooperatives.</li> <li>Currently the cooperative is confused because the condition of the land in the field is inadequate, the plants should have been replanted.</li> <li>In March 2023, KUD Mekar Lestari conduct mass action to PT BPK with several demands. First, the purchase of plasma fresh fruit bunches (FFB) is carried out according to the price set by the Kalimantan Barat Plantation Agency. Second, the management of PT BPK is obliged to carry out the conversion. Third, farmers request the formation of an independent investigative audit team on the implementation of plantation development from the beginning to the settlement of credit.</li> <li>For the first demand, this has been agreed upon and the company agrees to use the FFB price from the Kalimantan Barat Province Plantation Agency.</li> <li>The demands are exactly the same as those reported in the online news.</li> </ul>	<p>Based on interviews with the management of PT BPK, they were informed that the news was true. It was explained that for the first demand, it had been agreed that the FFB price from KUD Mekar Lestari used the FFB price set by the local government even though KUD Mekar Lestari had actually paid off and had been managed independently by each farmer.</p> <p>For the second demand, the Company explained that so far there has been no deduction for replanting funds as stated in the news. However, the company has offered assistance so that the Cooperative obtains funds from the government for the implementation of replanting activities and there have been several farmer groups within the Mekar Lestari KUD who have carried out replanting with funds from the government. The company explained that there was an internal conflict within the Cooperative, so the company is still communicating intensely to related parties so that the replanting activities receive funding from the government.</p> <p>For the third demand, the company does not mind if an independent investigation is carried out because basically the land has been managed by the Cooperative and currently it is only cooperating in terms of buying and selling FFB to PT BPK.</p>



<b>4.0</b>	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>
<b>4.1</b>	<b>Formal Sign-off of Assessment Findings</b>
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p style="text-align: center;">Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end; margin-top: 100px;"> <div style="text-align: center;"> <p><b>PT Bumi Pratama Khatulistiwa</b> Management Representative</p>  <p><b>Sigit Hadi Poernomo</b> Thursday, 05 October 2023</p> </div> <div style="text-align: center;"> <p><b>PT Mutuagung Lestari Tbk.</b> Lead Auditor</p>  <p><b>Hasiholan Sihombing</b> Thursday, 05 October 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	Kubu Raya Regency	-	Direct interview	July 04, 2023	✓	
2	Environment Agency	Kubu Raya Regency	-	Direct interview	July 04, 2023	✓	
3	Manpower and Transmigration Agency	Kubu Raya Regency	-	Direct interview	July 04, 2023	✓	
4	Land Agency	Kubu Raya Regency	-	Direct interview	July 04, 2023	✓	
5	Village Official of Sungai Malaya Village and Sungai Enau Village.	Kubu Raya Regency	-	Direct interview	July 04, 2023	✓	
6	Previous Land Owner and also plasma owner of KUD Mekar Lestari	Kubu Raya Regency	-	Direct interview	July 05, 2023	✓	
7	Gender Committee Estate	Kubu Raya Regency	-	Direct interview	July 04, 2023	✓	
8	Gender Committee Mill	Kubu Raya Regency	-	Direct interview	July 04, 2023	✓	
9	Worker Union at Mill	Kubu Raya Regency	-	Direct interview	July 04, 2023	✓	
10	Worker Union at Estate	Kubu Raya Regency	-	Direct interview	July 04, 2023	✓	
11	CV Bumi Sriwijaya Utama - Local Contractor	Kubu Raya Regency	-	Direct interview	July 04, 2023	✓	
12	CV Tramuk Jaya Barokah – Local Contractor	Kubu Raya Regency	-	Direct interview	July 04, 2023	✓	
13	CV Ingat Budi – FFB Supplier	Kubu Raya Regency	-	Direct interview	July 04, 2023	✓	
14	CV Mekar Jaya – FFB Supplier	Kubu Raya Regency	-	By Phone	July 04, 2023	✓	
15	Chairman of KUD Mekar Lestari	Kubu Raya Regency	-	By Phone	July 04, 2023	✓	
16	<b>BPK POM:</b> <ul style="list-style-type: none"> <li>Security: 2 securities</li> <li>Weighbridge: 2 clerk + 1 head clerks</li> <li>Warehouse: 1 Officer</li> <li>Workshop: 1 Mechanic</li> <li>WTP: 1 Operator</li> <li>Sortation: 4 officers</li> <li>Sterilizer: 1 operator</li> <li>Press: 1 operator</li> <li>Kernel: 1 operator</li> <li>Boiler: 3 operators</li> <li>Power House: 1 operator</li> </ul>	Kubu Raya Regency	-	Direct interview	July 04, 2023	✓	
17	<b>BPK Estate:</b> <ul style="list-style-type: none"> <li>Harvesting: 9 harvesters</li> <li>Harvesting: 1 fruit lose picker who don't have work ties</li> <li>Harvesting: 2 foremen</li> <li>FFB Loading: 1 Clerk</li> <li>FFB Loading: 2 Clerk</li> </ul>	Kubu Raya Regency	-	Direct interview	July 05, 2023	✓	

	<ul style="list-style-type: none"> <li>• FFB Loading: 2 contractor workers.</li> <li>• Warehouse: 1 Officer</li> <li>• Workshop: 1 Tractor Operators</li> <li>• Spraying: 9 workers</li> <li>• Manuring: 10 workers</li> </ul>						
18	Sawit watch	Bogor, Indonesia	<a href="mailto:info@sawitwatch.or.id">info@sawitwatch.or.id</a>	Email	June 23, 2023		✓
19	WWF	Jakarta, Indonesia	<a href="mailto:wwf-indonesia@wwf.or.id">wwf-indonesia@wwf.or.id</a>	Email	June 23, 2023		✓
20	WALHI	Jakarta, Indonesia	<a href="mailto:informasi@walhi.or.id">informasi@walhi.or.id</a>	Email	June 23, 2023		✓
21	AMAN	Jakarta, Indonesia	<a href="mailto:rumahaman@cbn.net.id">rumahaman@cbn.net.id</a>	Email	June 23, 2023		✓

**Appendix 2. Assessment Program**

DATE	03 – 07 July 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
<b>Monday, 03 July 2023</b>		
07.20 – 08.55	<b>JAKARTA → PONTIANAK</b>	All Auditor
09.00 – 11.00	From the airport to the audit location	All Auditor
12.00 – 14.00	<b>Break</b>	
14.00 – 15.00	<b>OPENING MEETING</b> <ul style="list-style-type: none"> <li>Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li> <li>Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li> </ul>	Management UoC All Auditor
16.30 – 17.00	Document verification and completing checklist.	All Auditor
<b>Tuesday, 04 July 2023</b>		
08.00 – 12.00	<b>Public Consultation :</b> <ul style="list-style-type: none"> <li>Stakeholders' consultation to related agencies.</li> <li>Stakeholder consultation to affected communities surrounding the plantations, indigenous peoples, local communities, and previous land owners.</li> <li>Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Smallholders, Third Party Supplier (if any), local NGO (if any)</li> </ul>	WAY SAS HAS & RAN
12.00 – 14.00	<b>Break</b>	
14.00 – 16.30	<b>Field Observation to BPK POM</b> <ul style="list-style-type: none"> <li>Supply Chain verification (FFB Receiving, Weighbridge)</li> <li>Implementation of Environmental aspect, Inspection to Chemical Storage, Hazardous Waste Storage, Workshop, WTP, Fire Control Simulation,</li> <li>Implementation of Occupational Health &amp; Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect, security post, FFB Sorting, Processing Activity, Despatch CPO)</li> <li>POME Pond, Land Application, Empty Bunch Area and Employees Housing Complex</li> </ul>	HAS WAY & SAS RAN WAY & SAS
16.30 – 17.00	submission of audit progress	All Auditor
<b>Wednesday, 05 July 2023</b>		
08.00 – 12.00	<b>Field Observation to BPK Estate</b> Aspect to be verified: <ul style="list-style-type: none"> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV.</li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health &amp; Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect</li> <li>Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place).</li> </ul>	HAS SAS & RAN WAY

DATE	03 – 07 July 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
12.00 – 14.00	<b>Break</b>	
14.00 – 16.30	Document verification and completing checklist.	<b>All Auditor</b>
16.30 – 17.00	submission of audit progress	<b>All Auditor</b>
<b>Thursday, 06 July 2023</b>		
08.00 – 12.00	Document verification and completing checklist.	<b>All Auditor</b>
12.00 – 14.00	<b>Break</b>	
14.00 – 16.30	Document verification and completing checklist.	<b>All Auditor</b>
16.30 – 17.00	submission of audit progress	<b>All Auditor</b>
17.00 - ...	Auditor team Interim meeting for closing meeting preparation.	<b>All Auditor</b>
<b>Friday, 07 July 2023</b>		
08.00 – 09.00	<b>CLOSING MEETING</b> <ul style="list-style-type: none"> <li>• Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion)</li> <li>• Comments, Responses and Questions</li> </ul>	<b>All Auditor</b>
09.00 – 11.00	Travel from audit site to the airport in Pontianak	<b>All Auditor</b>
13.45 – 15.10	<b>PONTIANAK → JAKARTA</b>	<b>All Auditor</b>

**Lampiran 3**

Daftar Periksa Penilaian untuk ST1, ST2, S1, S2, S3, S4 dan Penilaian Ulang ([wajib untuk keperluan pelaporan Tim Auditor dan membuat ringkasan pada laporan RSPO](#))