

Roundtable on Sustainable Palm Oil Certification
R S P O

[✓] Surveillance

Name of Management : Daya Labuhan Indah 2 Palm Oil Mill – PT Daya Labuhan Indah subsidiary of Organisation Wilmar International Limited

Plantation Name : PT Daya Labuhan Indah: Wonosari Estate & Sei Deras Estate
PT Perkebunan Milano: Cabang Dua Estate

Location : Sei Tampang Village, Bilah Hilir Sub-District, Labuhanbatu District, Sumatera Utara Province, Indonesia

Certificate Code : **MUTU-RSPO/047**

Date of Initial Registration : **08 October 2014**

Date of Last Issued : 21 July 2022 Date of License Issue : 8 December 2023

Date of Certificate Expiry : 07 October 2024 Date of License Expiry : 07 October 2024

Assessment	Assessment Date	PT. Mutuagung Lestari Tbk Auditor	Reviewed by	Approved by
ASA-1.4	11 to 14 July 2023	Octo HPN Nainggaolan (Lead Auditor Witnessing), Afiffuddin (Lead Auditor Witnessed), Benli Manurung, Moh Arif Yusni, and Indra Abadi	Hasiholan Sihombing	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA 1.4	23 November 2023

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Figure 1. Location Map of PT Daya Labuhan Indah and PT Perkebunan Milano

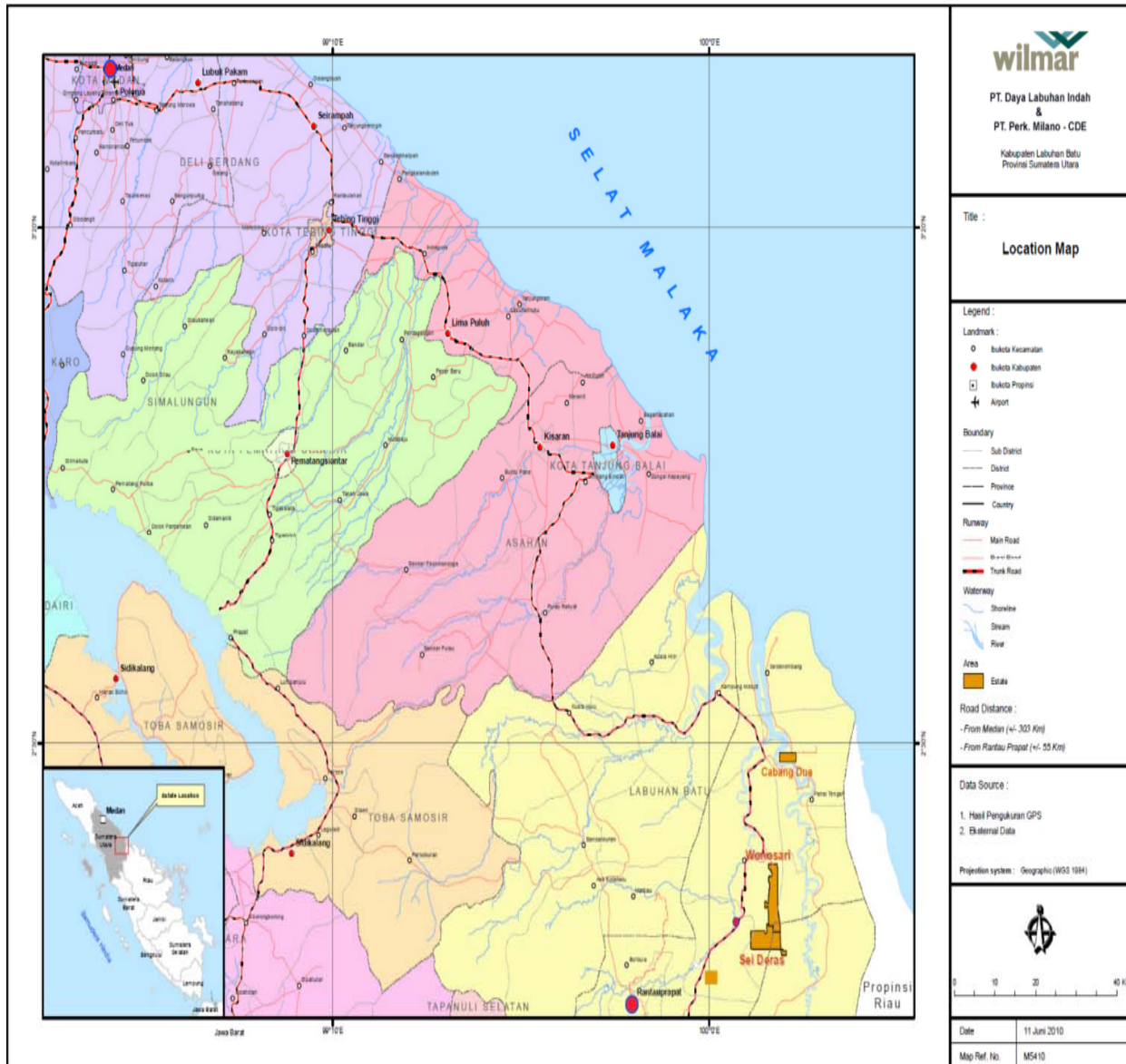


Figure 2. Operational Map of PT Daya Labuhan Indah – Wonosari Estate & Sei Deras Estate

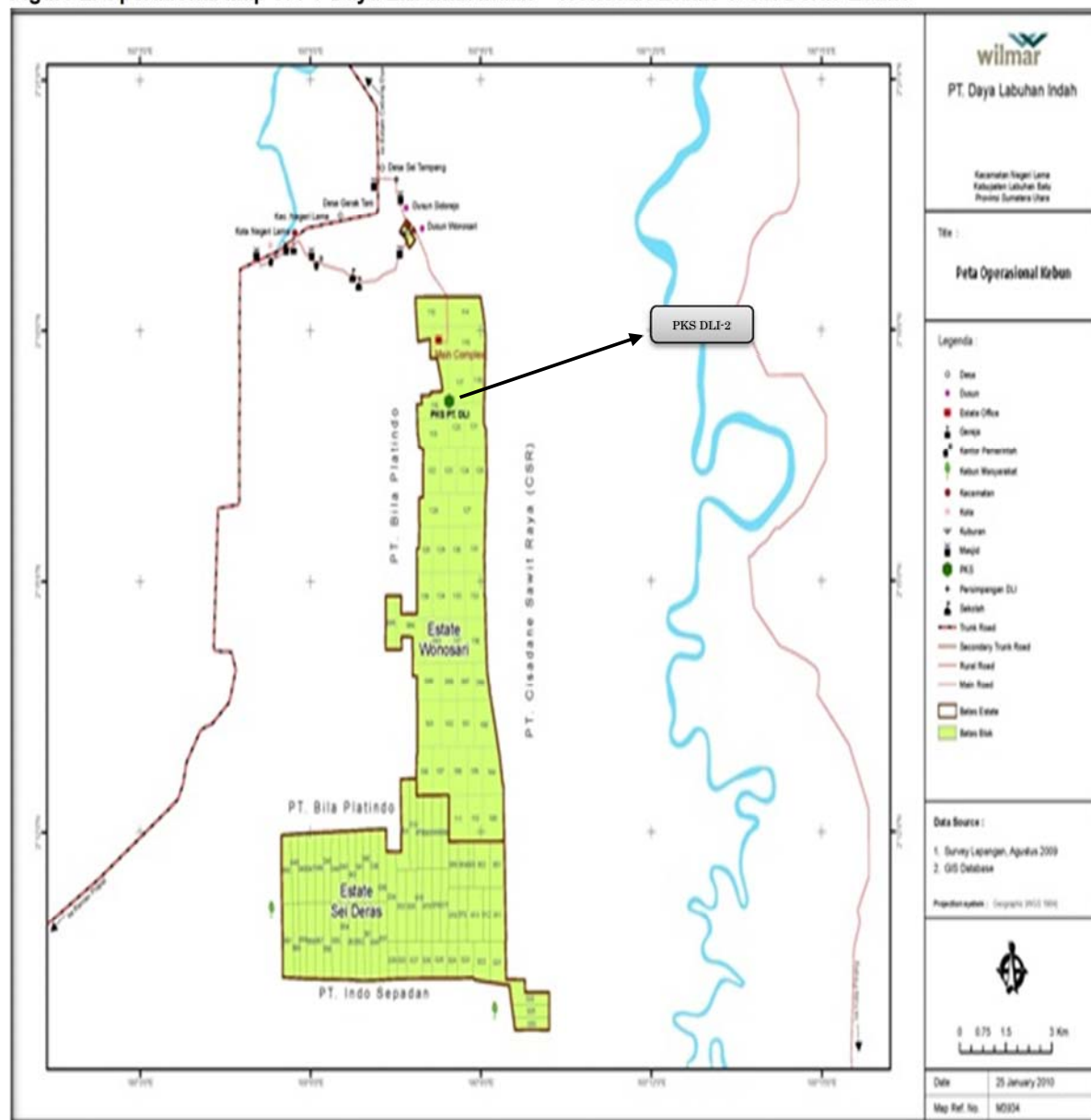
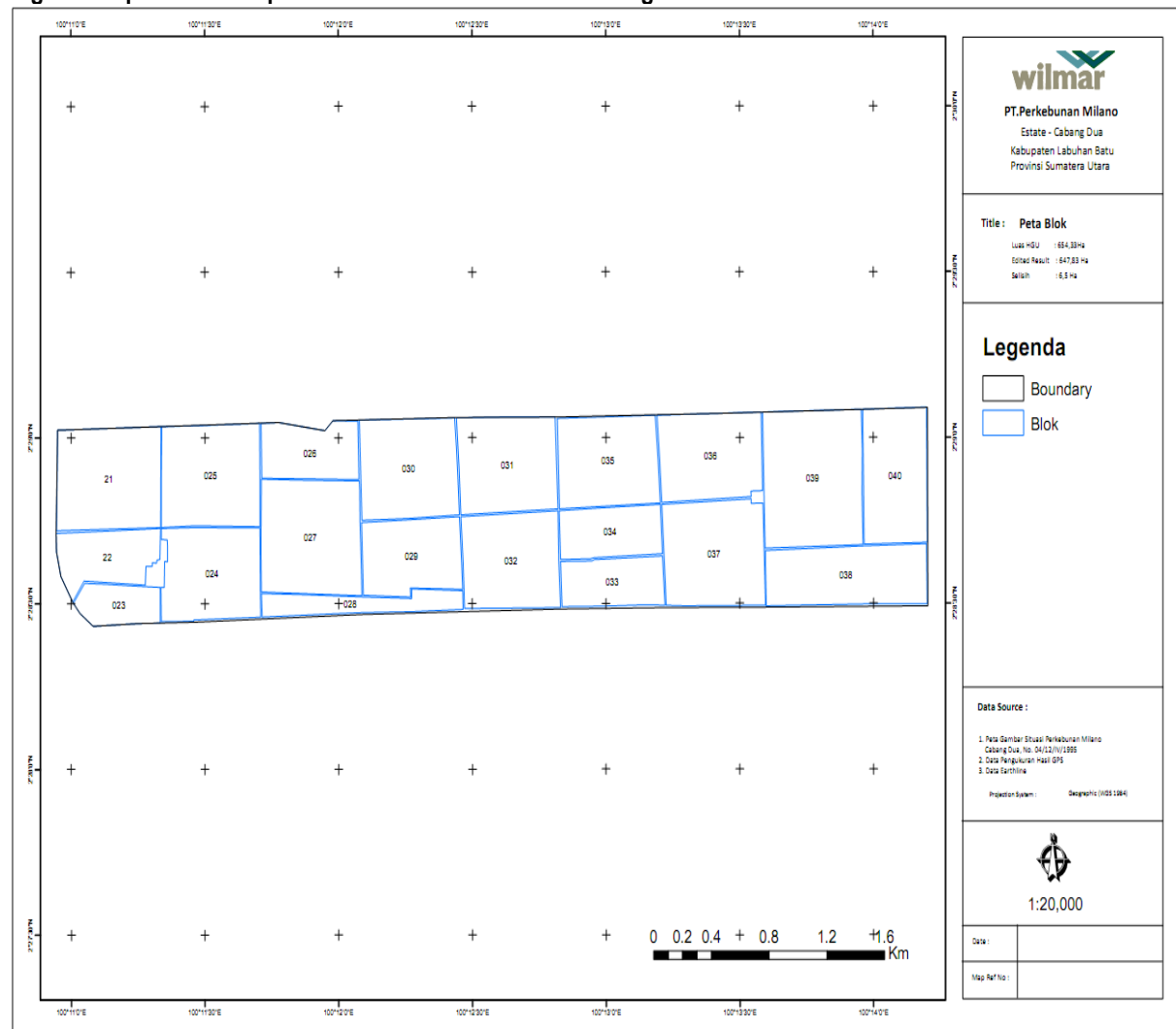


Figure 3. Operational Map of PT Perkebunan Milano – Cabang Dua Estate



Abbreviations Used

APAR	:	Fire Extinguisher (<i>Alat Pemadam Api Ringan</i>)
ASA	:	Annual Surveillance Assessment
BOD	:	Biochemical Oxygen Demand
BPS	:	<i>Badan Pusat Statistik</i> (Central Bureau of Statistic)
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> / Social Security Administrator
CB	:	Certification Body
CDE	:	Cabang Dua Estate
CLA	:	Collective Labor Agreement
COD	:	Chemical Oxygen Demand
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Cooperation Social Responsibility
DLI	:	Daya Labuhan Indah
DLW	:	Decent Living Wage
DO	:	Dissolved Oxygen
EFB	:	Empty Fruit Bunch
EHS	:	Environment, Health, and Safety
EIA	:	Environment Impact Assessment
EM	:	Estate Manager
FFB	:	Fresh Fruit Bunch
FGD	:	Focus Group Discussion
FPIC	:	Free, Prior, Informed, Consent
FR	:	Frequency Rate
FSPM	:	<i>Federasi Serikat Pekerja Metal Indonesia</i> or Indonesian Metal Worker Federation
GHG	:	Green House Gasses
GPS	:	Global Positioning System
HCV	:	High Conservation Value
HGU	:	Land Use Title
HIRAC	:	Hazard Identification Risk Assessment Control
HRD	:	Human Research Development
HRGA	:	Human Resource and General Affair
ILO	:	International Labour Organization
IP	:	Identity Preserved
IPLC	:	<i>Izin Pembuangan Limbah Cair</i> (Waste Water Disposal Permit)
IPM	:	Integrated Pest Management
IRC	:	Industrial Relation Conflict
ISPO	:	Indonesia Sustainable Palm Oil
IUP	:	License of Plantation
KCD	:	<i>Kebun Cabang Dua</i>
KSD	:	<i>Kebun Sei Deras</i>
KTU	:	<i>Kepala Tata Usaha</i> / Head of Administration
KWS	:	<i>Kebun Wonosari</i>
LB3	:	Scheduled Waste
LCC	:	Legume Cover Crop
LD50	:	Lethal Dose 50
LSU	:	Leaf Sampling Unit
LTA	:	Lost Time Accident

LUCA	:	Land Use Change Analysis
MB	:	Mass Balance
MSDS	:	Material Safety Data Sheet
MT	:	Metric Ton
MU	:	Mature Upkeep
NDPE	:	No Deforestation No Peat No Exploitation
NGO	:	Non-Government Organization
NIOSH	:	National for Occupational Safety and Health
OFI	:	Opportunity for Improvements
OHS	:	Occupational Health and Safety
P&C	:	Principles and Criteria
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> / Occupational Health and Safety Committee
PK	:	First Aid Kit
PKB	:	<i>Perjanjian Kerja Bersama</i> or Collective Labor Agreement
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PT DLI	:	PT Daya Labuhan Indah
RKL-RPL/UKL-UPL	:	Environment Management and Monitoring
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened, and Endangered
SCCS	:	Supply Chain Certification System
SDE	:	Sungai Deras Estate
SERBUNDO	:	<i>Serikat Buruh Perkebunan Indonesia</i> or Indonesia Labor Plantation Union
SIA	:	Social Impact Assessment
SOP	:	Standard Operational Procedure
SPSI	:	<i>Serikat Pekerja Seluruh Indonesia</i> or Labor Union of Indonesia
SR	:	Severity Rate
SSU	:	Soil Sampling Unit
UMSK	:	<i>Upah Minimum Sektor Perkebunan Kabupaten</i> or District Minimum Wages of Plantation Sector
WSE	:	Wonosari Estate
WTP	:	Water Treatment Plant
WWTP	:	Wastewater Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> Indonesia National Interpretation RSPO Principles and Criteria to Produce Sustainable Palm Oil 2018 Endorsed by the RSPO Board of Governors on 20th April 2020 RSPO Certifications Systems for Principles & Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020) 	
1.2	Organization Information		
1.2.1	Organization name listed in the certificate	Daya Labuhan Indah 2 Palm Oil Mill – PT Daya Labuhan Indah subsidiary of Wilmar International Limited	
1.2.2	Contact person	Jules Sonny Parapat	
1.2.3	Organization address and site address	<u>Head Office</u> 56 Neil Road, Singapore 088 030 <u>Official Liaison Office:</u> Multivison Tower Lt. 15 Jl. Kuningan Mulya Blok B9, Kuningan, Jakarta, 12980, Indonesia	
1.2.4	Telephone	(+62 21) 2938 0777	
1.2.5	Fax	-	
1.2.6	E-mail	jules.parapat@id.wilmar-intl.com	
1.2.7	Web page address	http://www.wilmar-international.com/	
1.2.8	Management Representative who completed the application for certification	Jules Sonny (Certification Lead Indonesia)	
1.2.9	Registered as RSPO member	2-0017-05-000-00 15 August 2005	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: Daya Labuhan Indah 2 Palm Oil Mill, Wonosari Estate, Sei Deras Estate and Cabang Dua 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 Longitude
	Daya Labuhan Indah 2	Sei Tampang Village, Bilah Hilir Sub-District, Labuhanbatu District, Sumatera Utara Province, Indonesia	N 02° 17' 10" E 100° 08' 27"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Wonosari Estate	Sei Tampang Village, Bilah Hilir Sub-District, Labuhanbatu District, Sumatera	N 02° 17' 54" E 100° 08' 16"

		Utara Province, Indonesia		
	Sei Deras Estate	Bilah Village, Bilah Hilir Sub-district, Labuhanbatu District, Sumatera Utara Province, Indonesia	N 02° 10' 47"	E 100° 08' 08"
	Cabang Dua Estate	Sei Nahodaris Village, Panai Tengah Sub-district, Labuhanbatu District, Sumatera Utara Province, Indonesia	N 02° 08' 36"	E 100° 11' 18"
1.5	Description of Area Statement			
1.5.1	Tenure			
	<ul style="list-style-type: none">State<ul style="list-style-type: none">PT Daya Labuhan IndahPT Perkebunan MilanoCommunity		6,226.58 Ha 5,572.25 Ha 654.33 Ha - Ha	
1.5.2	Area Statement			
	<ul style="list-style-type: none">Total areaMature areaImmature areaMillBuilding and roadsOccupation areaHCV		6,226.58 Ha 5,677.84 Ha - Ha 12.91 Ha 423.06 Ha 101.04 Ha 11.73 Ha	
1.6	Planting Year and Cycles			
1.6.1	Age profile of planting year			
	Planting Year	Hectarage (Ha)		
		Wonosari Estate	Sei Deras Estate	Cabang Dua Estate
	2009	582.12	0	0
	2010	904.23	0	0
	2012	0	613.12	0
	2013	0	995.11	71.65
	2014	836.84	810.17	268.83
	2015	258.46	64.89	0
	2017	0	0	272.42
	TOTAL	2,581.65	2,483.29	612.90
1.6.2	New Planting area after January 2010		- Ha	
1.6.3	Planting Cycle		2 nd Cycle	
1.7	Description of Mill and Supply Base			
1.7.1	Description of Mill			
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO Out put (tonnes)
				Extraction (%)
	Daya Labuhan Indah 2	30	134,346.96	26,330.11
				19.60
				4,495.89
				3.35

	*Production data source from 12 months before assessment (July 2022 – June 2023)						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/ year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Wonosari Estate	2,944.59	2,581.65	54,802.49	21.23	54,784.04	99.97
	Sei Deras Estate	2,627.66	2,483.29	62,808.02	25.29	62,750.19	99.91
	Cabang Dua Estate	654.33	612.90	13,049.16	21.29	13,010.26	99.70
	TOTAL	6,226.58	5,677.84	130,659.67	23.01	130,544.49	99.86
	*Production data source from 12 months before assessment (July 2022 – June 2023)						
1.7.3	FFB description from other source						
	Name of sources/Organization	Type of Organization	Number of Smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Merbau Estate (RSPO certified)	PT Perkebunan Milano subsidiary of Wilmar International Ltd	-	974.77	3,503.56		
	TOTAL					3,503.56	
	*Production data source from 12 months before assessment (July 2022 – June 2023)						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product			Last Year Projected Certified Volume (8 November 2022 to 7 October 2023) (MT)		Last Year Actual Certified Volume (July 2022 – June 2023) (MT)	
	FFB Processed IP			138,871		134,346.96	
	FFB Processed MB			7,309		-	
	CPO Production IP			30,550		26,330.11	
	CPO Production MB			1,600		-	
	PK Production IP			5,550		4,495.89	
	PK Production MB			290		-	
	*License period is start from 8 November 2022 to 7 October 2023						
1.8.2	Product selling						
	Type of selling product			Actual selling product for last year (July 2022 – June 2023) (MT)			
	CSPO sold as RSPO certified product IP			26,479.82			
	CSPO sold as RSPO certified product MB			0			
	CSPK sold as RSPO certified product IP			4,449.93			
	CSPK sold as RSPO certified product MB			0			
	CSPO sold under other scheme IP			0			
	CSPO sold under other scheme MB			0			
	CSPK sold under other scheme IP			0			
	CSPK sold under other scheme MB			0			
	CSPO sold as conventional IP			0			
	CSPO sold as conventional MB			0			

	CSPK sold as conventional IP			0				
	CSPK sold as conventional MB			0				
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)		Yield (tonnes/ha/year)		
				IP	MB			
	Wonosari Estate	2,944.59	2,581.65	62,115	3,269	25		
	Sei Deras Estate	2,627.66	2,483.29	59,748	3,145	25		
	Cabang Dua Estate	654.33	612.90	14,747	776	25		
	TOTAL	6,226.58	5,677.84	136,610	7,190	25		
*Projected FFB production for 12 months of certificate								
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	Daya Labuhan Indah 2	30	136,610 7,190	30,054 1,582	22	5,464 288	4 4	IP MB
*Projected CSPO and CSPK production for 12 months of certificate								
1.9	Other Certifications							
	ISCC			-				
	ISPO			ISPO certificate No. MUTU-ISPO/092 by Mutuagung Lestari (RS-1) issued on 21 October 2022 valid until 03 August 2027				
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	2010	Mustika Sembuluh 1	2010	Central Kalimantan	Certified		
		Mustika Sembuluh POM 2 (PT Mustika Sembuluh)	2015	Mustika Sembuluh 2	2010	Central Kalimantan	Certified	
				Mustika Sembuluh 3	2010	Central Kalimantan	Certified	
	KUD Bitu Maju Bersama			2014	Central Kalimantan	Certified		
	Kerry Sawit Indonesia 1 POM	2011	Kerry Sawit Indonesia 1	2011	Central Kalimantan	Certified		
			Kerry Sawit Indonesia 2	2011	Central Kalimantan	Certified		
			Kerry Sawit Indonesia 3	2011	Central Kalimantan	Certified		
	Kerry Sawit Indonesia 2 POM (PT Kerry Sawit Indonesia)	2015	KUD Karya Bersama	2026	Central Kalimantan	-		
			KUD Sejahtera Bersama	2026	Central Kalimantan			
			KUD Tabiku Makmur	2026	Central Kalimantan			
			KUD Kosudra	2026	Central Kalimantan			
	Bumi Sawit Kencana	2013	Bumi Sawit Kencana 1	2013	Central Kalimantan	Certified		

POM (PT Bumi Sawit Kencana)		Bumi Sawit Kencana 2	2013	Central Kalimantan	Certified
POM 1 and POM 2 (PT Sarana Titian Permata)	2026	Sarana Titian Permata 1	2026	Central Kalimantan	-
		Sarana Titian Permata 2	2026	Central Kalimantan	-
		Sarana Titian Permata 3	2026	Central Kalimantan	-
Mentaya Sawit Mas POM (PT Mentaya Sawit Mas)	2015	Mentaya Sawit Mas 1	2015	Central Kalimantan	Certified
		Mentaya Sawit Mas 2	2015	Central Kalimantan	Certified
		KUD Karya Makmur Pahirangan	2026	Central Kalimantan	-
Rimba Harapan Sakti POM (PT Rimba Harapan Sakti)	2015	Rimba Harapan Sakti 1	2015	Central Kalimantan	Certified
		Rimba Harapan Sakti 2	2015	Central Kalimantan	Certified
		Serba Usaha Makmur Sejahtera Cooperative	2026	Central Kalimantan	-
Karunia Kencana Permaisejati POM (PT Karunia Kencana Permaisejati)	2017	Karunia Kencana Permaisejati 1	2017	Central Kalimantan	Certified
		Karunia Kencana Permaisejati 2	2017	Central Kalimantan	Certified
		Karunia Kencana Permaisejati 3,	2017	Central Kalimantan	Certified
Agro Nusa Investama POM (PT Agro Nusa Investama (Sambas))	2019	Agro Nusa Investama (Sambas) Estate	2019	West Kalimantan	Certified
		KUD Cempaka Biru	2019	West Kalimantan	Certified
		KUD Sentama Lestari	2019	West Kalimantan	Certified
		Sri Maram Estate	2026	West Kalimantan	-
		Sri Maram Cooperative	2026	West Kalimantan	-
		Pusaka Abadi Nan Jaya Cooperative	2026	West Kalimantan	-
Bumipratama Khatulistiwa POM (PT Bumi Pratama Khatulistiwa)	2016	Bumi Pratama Khatulistiwa Estate	2016	West Kalimantan	Certified
		PT Buluh Cawang Plantation	2026	West Kalimantan	-
		KUD Tuah Jubata	2026	West Kalimantan	-
Agro Nusa Investama (Landak) POM PT Agronusa Investama - Pahauman	2023	PT Agronusa Investama Pahauman Estate	2026	West Kalimantan	-
		Pratama Procentindo Estate (PT Pratama Procentindo)	2026	West Kalimantan	-
Agro Palindo Sakti POM (PT Agro Palindo Sakti 2)	2023	Agro Palindo Sakti Estate	2026	West Kalimantan	-
		Putra Indotropical Estate (PT Putra Indotropical Estate)	2026	West Kalimantan	-
		Daya Landak Plantation Estate (PT Daya Landak Plantation)	2026	West Kalimantan	-
		Indoresin Putra Mandiri (PT Indoresin Putra Mandiri)	2026	West Kalimantan	-

Indonesia – Sumatera Region					
Pinang Awan POM (PT Perkebunan Milano)	2009	Sei Daun	2009	North Sumatera	Certified
		Batang Saponggol	2009	North Sumatera	Certified
		Marbau	2009	North Sumatera	Certified
Tania Selatan POM (PT Tania Selatan)	2010	Burnai Barat	2010	South Sumatera	Certified
		Burnai Timur	2010	South Sumatera	Certified
Kencana Sawit Indonesia POM (PT Kencana Sawit Indonesia)	2011	Kencana Sawit Indonesia (Division 1, Division 2 and Division 3)	2011	West Sumatera	Certified
AMP Plantation POM (PT AMP Plantation)	2011	AMP I	2011	West Sumatera	Certified
		AMP II	2011	West Sumatera	Certified
		AMP III	2011	West Sumatera	Certified
		AMP IV	2011	West Sumatera	Certified
		Primatama Mulia Jaya	2011	West Sumatera	Certified
		Tompek Tapan Kandis cooperative	2014	West Sumatera	Certified
		Mutiara Sawit Jaya cooperative	2014	West Sumatera	Certified
		Bukit Sandiang Tigo cooperative	2014	West Sumatera	Certified
		Agro Wira Masang cooperative	2014	West Sumatera	Certified
Buluh Cawang Plantation POM (PT Buluh Cawang Plantation)	2012	Bumi Arjo	2012	South Sumatera	Certified
		Dabuk Rejo	2012	South Sumatera	Certified
		Sukamulya	2012	South Sumatera	Certified
		Bambu Kuning	2012	South Sumatera	Certified
Gersindo Minang Plantation POM (PT Gersindo Minang Plantation)	2012	Gersindo Minang Plantation	2012	West Sumatera	Certified
		Permata Hijau Plantation 1	2012	West Sumatera	Certified
		Permata Hijau Plantation 2	2012	West Sumatera	Certified
		PT Permata Hijau Pasaman (block 22)	2026	West Sumatera	-
Daya Labuhan Indah POM (PT Daya Labuhan Indah)	2013	Wonosari	2013	North Sumatera	Certified
		Sei Deras	2013	North Sumatera	Certified
		Cabang Dua (PT Milano)	2013	North Sumatera	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	South Sumatera	-
		Sei Jarum	2026	South Sumatera	-
		Agro Palindo Sakti Estate	2022	South Sumatera	Certified
Sinarsiak Dianpermai POM (PT Sinarsiak Dianpermai)	2023	Sinarsiak Dianpermai Estate	2026	Riau	-
Agro Indah Persada	2023	Agrindo Indah Persada	2026	Bangko – Jambi	-

2 POM (PT. Agroindo Indah Persada)		Estate			
Malaysia					
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 Berhad)	2010	Ribubonus	2010	Sandakan, Sabah, Malaysia	Certified
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 assessor 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
Africa						
	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 Limited	2022	Calaro extension	2023	Cross River State, Nigeria	To be certified, 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	Progress of Associated Smallholders and Outgrowers for Certifiable Standard					

Until this audit, Daya Labuhan Indah 2 POM has no engagement with associated smallholder and out grower for certifiable standard.

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA 1.4	<p>1. Octo HPN Nainggolan (Lead Auditor Witnessing). Indonesian citizen, Bachelor of Agriculture, majoring in Agricultural Socio-Economic (Agribusiness). Seven years of experience working since 2004 in oil palm plantation companies in Indonesia and participated in several trainings, namely: Nature Conservation Training and Biological Resources in HCV support, Basic Plantation Management Program, Integrated Pest Management training, Management System Certification (ISO 9001-2008 / SNI 19011 -9001:2008), Environmental Management System (ISO 14001:2004), OHSAS based SMK3, RSPO Lead Auditor Course supported by Proforest and Wild Asia, Indonesian Sustainable Palm Oil (ISPO) Lead Auditor training course, supply chain certification system training and Lead training RSPO Renewable Energy Directive auditors. He currently works as an auditor at the Certification Body. During the audit he witnesses the team.</p> <p>2. Afiffuddin (Lead Auditor Witnessed). Indonesian citizen, Diploma III majoring Palm Oil Plantation, Bogor Agricultural University. Five years working experience since 2010 at Oil Palm Plantation Company in Indonesia as agronomy operational staff and followed several trainings namely: Basic Plantation Management Program, Lead Auditor ISPO in 2016, RSPO P&C Lead Auditor Course in 2018, RSPO Supply Chain Certification Lead Auditor Course in 2021, OHS General Expert, OHS System Management based on PP 50 2012 and Management System Certification (ISO 9001-2015/SNI 19011-9001:2015) ISO 17021, ISO 17065, SA 8000 training. During this audit, he assigned to verify legal aspect, land dispute, SCCS, Best Management Practices and OHS aspects.</p> <p>3. Benli Manurung (Auditor). Bachelor of Agriculture Majoring in Soil Science. He has more than 4 years of experience as a plantation operations staff in a private oil palm plantation company in Indonesia. The training he has attended include: ISPO, RSPO, Lead auditor of ISO 9001: 2015; ISO 14001; 2015, IHT Health & Safety Aspect and Best Management Practice. Has participated in several audit activities since 2016 in the field of Best Management Practice, Health & Safety Aspect and Worker Welfare. During the audit, he verified worker welfare and smallholders' inclusion.</p> <p>4. Moh Arif Yusni (Auditor). Indonesian citizen. Bachelor of Agriculture, majoring in Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor course in 204, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, RSPO and ISPO Lead auditor refresher course in 2021 etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. During the audit, she verified OHS, environment, waste management, GHG and conservation aspect.</p> <p>5. Indra Abadi (Auditor Trainee). Indonesian citizens. Bachelor of Forestry from Bogor Agricultural Institute with Forest Management. Have groundcheck freelance experience at Geolancer. Participate in ISO 9001:2015 and 14001 Auditor training in 2022, Lead Auditor course 9001: 2015 training in 2022. Curriculum vitae (CV) of members and the assessment team is available at the office of PT. Mutuagung Lestari. In this audit activity, verification of Best Management Practices and OHS aspects was carried out.</p> <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA 1.4	<p>Number of auditors: 3 auditors and 1 auditor trainee</p> <p>Number of days for ASA 1.4 onsite audit: 4 days</p> <p>Number of working days for ASA 1.4 onsite audit: 12 Working days</p>
2.2.2	Assessment Process
ASA 1.4	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the Daya Labuhan Indah 2 Palm Oil Mill – PT Daya Labuhan Indah to the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, endorsed by the RSPO Board of</p>

Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.

The scope of certification of PT Daya Labuhan Indah subsidiary of Wilmar International Ltd operation consisting of one (1) mill (Daya Labuhan Indah 2 Palm Oil Mill) with supply base three (3) own estate (Wonosari Estate, Sei Deras Estate and Cabang Dua Estate).

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 11 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 Daya Labuhan Indah. Closing meeting was held on 14 July 2023 attended 14 by the same participants as the opening meeting. Management PT PT Daya Labuhan Indah accept all the onsite ASA-1.4 audit results.

The assessment program please find Appendix 2.

2.2.3 Locations of Assessment

ASA 1.4

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

Daya Labuhan Indah 2 POM

- **Security Post.** Observations and interviews with security officers related to work procedures, supply chain, employment, complaint mechanisms and K3 aspects.
- **Weighbridge.** Observations and interviews with weighbridge officers related to work procedures, supply chain, employment, complaint mechanisms and K3 aspects.
- **Grading station.** Observation and interviews with workers related to labor and OHS aspect.
- **CPO dispatch station.** Observation related to OHS implementation in mill, and supply chain aspect
- **Housing of POM.** Observations and interviews related to facilities and infrastructure for the welfare of workers.
- **WWTP.** Field observations related to Ban to entry to WWTP, run off, testing of effluent. Officers equipped with PPE and Recording of effluent debit effluent.
- **Chemical Storage.** Observation related to OHS, environmental, and worker welfare aspects.
- **Sparepart and PPE Storage.** Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.
- **Empty Bunch Area.** Observation related to implementation of procedures, OHS and environmental aspects.
- **WTP.** Observation of waste management, management of chemical use, use of PPE for workers and availability of flowmeters
- **Reservoir.** Observation and interview related work procedure, employment, safety, and environmental aspect.
- **Temporary Hazardous Waste Storage.** Observation for OHS, waste disposal, and environmental aspects.
- **Fuel and Oil Storage.** Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.
- **Strileizer station.** Field observations related to work techniques, safe work practices, and employment
- **Boiler station.** Field observations related to technical work, safe work practices, and employment
- **Engine Room** Field observations related to technical work, safe work practices, and employment
- **Workshop** Field Observation related to work techniques, safe work practices, and employment

Wonosari Estate

- **BPN no VI Block 131 Div I.** Observation of the condition and position of the boundaries of the stakes and HGU boundaries.
- **BPN no VII Block 136 Div I.** Observation of the conditions and position of the boundaries of the stakes and HGU boundaries.
- **Harvest Block 141 Div II.** Observations and interviews with workers related to work techniques, application of K3, remuneration and handling of complaints.
- **BPN benchmark no 8 Div II.** Observation of condition and position of HGU boundaries and stakes.
- **Loose fruit picker (everyday fertilizer worker). Block 145 Div II.** Observation and interviews with workers related to technical work, application of OHS, wages and complaint handling.
- **Barn Owl Box (Gupon) Block 157 Div II.** Field observations related to biological pest control
- **Peat Subside Block 144 Div II.** Observation of peatland management
- **Piezometer Block 138 Div II.** Observation of peatland management
- **Fire Tower Block 139 Div II.** Field observations related to facilities and infrastructure for prevention and control of forest and land fires.
- **Circle and Path Spraying, Block 127 Div I.** Observation and interviews with workers related to technical work, application of OHS, wages and complaint handling.
- **Harvest Block 123 Div I.** Observations and interviews with workers regarding work techniques, K3 implementation, wages and complaint handling.
- **Employee Housing Division II.** Observations regarding the availability and feasibility of worker facilities and domestic waste management.
- **Landfill.** Observations related to domestic waste management.
- **Hazardous Waste Temporary Warehouse.** Observations and interviews regarding the management of Hazardous Waste, symbols, and emergency response preparedness
- **Fertilizer warehouse** Observations and interviews with warehouse staff related to work procedures, warehouse housekeeping, environmental management, Hazardous Material/ Hazardous Waste management, employment, complaint mechanisms and OHS aspects.
- **Warehouse of firefighters** Field observations related to facilities and infrastructure for prevention and control of forest and land fires
- **Mixing room rinse house,** PPE warehouse and work tools. Observations regarding the management of agrochemical materials and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Oil warehouse** Observations and interviews with warehouse staff related to work procedures, warehouse housekeeping, environmental management, Hazardous Material/ Hazardous Waste management, employment, complaint mechanisms and OHS aspects.
- **Pesticide Warehouse** Observations and interviews with warehouse staff related to work procedures, warehouse housekeeping, environmental management, Hazardous Material/ Hazardous Waste management, employment, complaint mechanisms and OHS aspects.
- **Workshop** Field Observation related to work techniques, safe work practices, and employment
- **PPE stock warehouse** Observations and interviews with workers regarding storage activities, OHS, environment and aspects of worker welfare.
- **Clinic** Observation and interview in health facilities, environment, training, and employment

Sei Deras Estate

- **Boundary pole number VIII Division 1 Block 72.** Observation regarding maintenance and marking of company boundary markers.
- **Boundary pole number IX Division 1 Block 82.** Observation regarding maintenance and marking of company boundary markers.
- **Herbicide application Division 1 Block 65.** Observations and interviews with workers related to work procedures, environmental management, OHS, employment and complaint mechanisms.
- **Subsidence pole and Piezometer Division 1 Block 67.** Field observations related to peatland management.

- **Harvesting Division 1 Block 67.** Observations and interviews with workers regarding work procedures, environmental management, OSH, employment and grievance mechanisms.
- **Manuring Division 2 Block 90.** Field observations and interviews related to OHS, BMP and employment aspects.
- **Housing Area Division 1 and 2.** Observation related to availability of infrastructure such as employee housing facilities, water facilities, educational facilities, religious facilities, health facilities and sports facilities.
- **Landfill Area Division 2.** Observation of domestic waste management and environmental aspect.
- **Rinse House Division 1.** Observation and interview related work procedure, employment, safety, and environmental aspect.
- **Daycare Division 1.** Observation related to facility, OHS and worker welfare aspects.
- **Agrochemical Storage** Observation and interview with worker related to chemical management, OHS, and environmental aspect.
- **Pesticide and Chemical Storage.** Observation and interview with worker related to chemical management, OHS, and environmental aspect.
- **Firefighting Equipment Storage.** Observation and interview with worker related to hazardous waste management, OHS, and environmental aspects
- **Spare part and PPE Storage.** Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.
- **Workshop.** Observation and interview with worker related to workshop activity, OHS, environmental and worker welfare aspect.
- **HCV Biru Lake Block O62.** Observations regarding management of water body areas and HCV attributes.
- **Fuel and Oil Storage.** Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.
- **Clinic.** Observations and interviews with officers regarding the condition of health facilities, OHS, and medical waste management.

Cabang Dua Estate

- **Boundary pole number I Block 41.** Observation regarding maintenance and marking of company boundary markers.
- **Boundary pole number X Block 43.** Observation regarding maintenance and marking of company boundary markers.
- **Boundary pole number XI Block 42.** Observation regarding maintenance and marking of company boundary markers.
- **Conservation of the Sacred Grave (Kuburan Keramat) Block 42.** Observation of management of conservation areas owned by the company.
- **Fire Tower Block 47.** Field observations related to the implementation of fire monitoring and control.
- **Housing Area.** Observation related to availability of infrastructure such as employee housing facilities, water facilities, educational facilities, religious facilities, health facilities and sports facilities.
- **Sparepart and PPE Storage.** Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.
- **Pesticide and Chemical Storage.** Observation and interview with worker related to chemical management, OHS, and environmental aspect.
- **Agrochemical Storage** Observation and interview with worker related to chemical management, OHS, and environmental aspect.
- **Fuel and Oil Storage.** Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect.
- **Rinse House and PPE Storage.** Observation and interview related work procedure, employment, safety, and environmental aspect.
- **Workshop.** Observation and interview with worker related to workshop activity, OHS, environmental and worker welfare aspect.
- **Firefighting Equipment Storage.** Observation and interview with worker related to hazardous waste management, OHS, and environmental aspects.

	<ul style="list-style-type: none"> • Temporary Hazardous Waste Storage. Observation for OHS, waste disposal, and environmental aspects. • Loose Fruit Picking. Observation and interview with harvester related fruit ripeness, safe working practices and worker welfare. • Harvesting Block 50. Observation and interview with harvester related fruit ripeness, safe working practices and worker welfare. • Peat Area Block 51 Observation peat area, water management, water level monitoring, piezometer monitoring and subsidence pole conditions and staff interviews on monitoring techniques. • Landfills Block 44. Observations related to domestic waste management.
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA 1.4	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Daya Labuhan Indah was held by:</p> <ul style="list-style-type: none"> • Public Announcement at Mutuagung website www.mutucertification.com on 26 June 2023 • Public consultation with government agencies of Labuhanbatu District (Land Agency, Agriculture Agency, Labor Agency and Environmental Agency) on 11 July 2023 • Public consultation by interview with locals of the nearby village on 11 & 13 July 2023 • Public consultation and interview with Internal (labor union and gender committee) and External Stakeholder (contractor) on 11 & 13 July 2023 • Public consultation with NGOs (by email) such as WWF Indonesia, WALHI, AMAN and Sawit Watch on 4 July 2023 <p>Numbers of input from stakeholders were clarified by PT Daya Labuhan Indah</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit RC will be conducted eight (8) months to twelve (12) months.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Daya Labuhan Indah 2 POM – PT Daya Labuhan Indah subsidiary of Wilmar International Limited operation consisting of one (1) mill and three (3) oil palm estates.

During the assessment, there is no non-conformity (major/minor), only six (6) opportunities for improvement were identified.

MUTUAGUNG LESTARI found that Daya Labuhan Indah 2 POM – PT Daya Labuhan Indah subsidiary of Wilmar International Limited complied with the requirements of **Indonesia National Interpretation RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSPO Board of Governors on 20th April 2020 and RSPO Certifications Systems for Principles & Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020)**

Therefore, MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is **continued**.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1 The unit of certification can show evidence that information has been received in an appropriate form and language related to stakeholder engagement, rights and obligations of the company which is conveyed to all relevant stakeholders, including:		
<u>Compliance with Environment Regulations</u>		
<ul style="list-style-type: none"> Receipt of Reporting <i>RKL-RPL</i> Document Semester 1 2023 (No.051/DLI/KSD/Ext/VII/2023) to the Head of Environmental Agency Labuhanbatu Regency, Sumatra Utara Province on June 6, 2023. Receipt of Reporting <i>RKL-RPL</i> Document Semester 2 of 2022 report (No. 015/DLI/KSD/Ext/II/2022) to the Head of DLH Labuhanbatu Regency, Sumatra Utara Province on January 20, 2022. Receipt of Reporting of Hazardous Waste Management for Wonosari and Sei Deras Estates for the second quarter of 2023 with Number 050/DLI/KWS/Ext/IV/2023 on June 6, 2023 to the Labuhan Batu Regency Environmental Service. E-receipt Management of B3 Waste from Wonosari and Sei Deras Estates for the second quarter of 2023 with ID No. 3989 to Environmental Agency of Labuhan Batu Regency, Environmental Agency of Sumatra Utara Province, and KLHK on 01 June 2023. Receipt of Reporting of Hazardous Waste Management for Wonosari and Sei Deras Estates for the first quarter of 2023 with Number 035/DLI/KWS/Ext/IV/2023 on April 3, 2023 to the Labuhan Batu Regency Environmental Service. Receipt of Reporting of Hazardous Waste Management at Wonosari and Sei Deras Estates for Quarter IV 2022 with Number 002/DLI/KWS/Ext/II/2023 on January 3, 2023 to the Labuhan Batu Regency Environmental Service. Receipt of Reporting of POME Management POM DLI-02 Quarter I 2023 with Number 088/PKSDLI-2/EL/IV/2023 on April 28 2023 to the Environmental Office of Labuhan Batu Regency, DLH Sumatra Utara Province. Receipt of Reporting of POME Management POM DLI-02 Quarter I 2023 with Number 088/PKSDLI-2/EL/IV/2023 on April 28 2023 to the Environmental Office of Labuhan Batu Regency, DLH Sumatra Utara Province. Receipt of Reporting of Hazardous Waste Management POM DLI-02 Quarter I 2023 with Number 004/011/PKS DLI-2/EL/IV/23 on April 28 2023 to the Environmental Office of Labuhan Batu Regency, DLH Sumatra Utara Province. 		
<u>Compliance with Best management practice</u>		
<ul style="list-style-type: none"> The 1st semester of 2023 Plantation Business Development Report was submitted to the Labuhanbatu District Agriculture Office 		

on July 10, 2023.

- PT DLI's semester 1 2023 fire report which was sent to the agricultural service Ka, Labuhan Batu on July 6 2023
- PT DLI's semester 2 2023 fire report which was sent to the agricultural service Ka, Labuhan Batu on January 17 2023
- Fire report for semester 1 2023 PT Milano which was sent to the agriculture office Ka, Labuhan Batu on July 5 2023

Manpower Aspect:

- UoC has implemented a minimum wage and the fulfillment of overtime wages.
- UoC already has and implements a pay scale structure in accordance with Minister of Manpower Regulation No. 01 of 2017.
- There was no illegal worker, underage labor and forced labor systems.
- UoC has registered all workers in health insurance and social security insurance.
- Employment Report of 2023 which was reported online on 07 July 2022 with registration number 20221229.0001

1.1.2

The company already has data information that can be accessed by multiple parties. The information has been reported to the relevant agencies, including:

- Proof of membership for *BPJS Kesehatan* June 2022 Sei Deras Estate which was paid on June 8, 2023 for 399 people.
- Mandatory Employment report Cabang Dua Estate with reporting number 21472.20230706.0001 dated 06 June 2023.
- Etc

All stakeholders basically had a good understanding related to the available/accessible information provided by the UoC. Based on the interview with Agencies of Labuhanbatu Regency, they stated that if they needed information, they would contact the company through the mobile app or information request letter and the company responded and submitted mandatory report in accordance with its period.

1.1.3

The company has Information Service Procedures for the Public with No. Document: SOP-BNM-003 Revision 01 Effective date February 1, 2015. The procedures include explaining the flow of requests and providing information. Based on the timeframe in the process, it is known that the longest period in the application process and providing information is one month. The unit of certification also has a logbook to record every request for information contained in the External Incoming Logbook. The logbook describes the date of the letter, origin, type of input (complaint, request for information, proof of delivery (letter/oral), recommendation, response (realization and date of response) and status. Records of requests and responses of stakeholder information is stored at Estate Office.

The results of a review of incoming and outgoing documents show that the company has responded to incoming letters, for example Letter requesting information number 141/ST/2023 dated 20 February 2023 from the Village Head of Sei Tampang regarding the Request for Washing the Ditches and has been responded to on 08 March 2023 via letter number 028/DLI/KWS/Ext/III/2023.

1.1.4

The company shows communication and consultation procedures with number PRO-GEN-011 revision number 03 dated October 26, 2017. The PICs who are in charge of communicating and consulting based on job descriptions are managers or unit heads. Based on the results of interviews with local contractors, village around, and government agencies, it is known that the stakeholders already know the mechanism for requesting and providing information as well as communicating and submitting complaints to the company, namely verbally through direct meetings or telephone and can also be through letters.

1.1.5

The unit of certification has provided an updated list of stakeholders in 2023 which consists of legal entities, worker organization, supplier, contractor, villages, and others (including NGO). The document contains a list of names, types of relevant stakeholders, stakeholder address and stakeholder contacts. Based on the list, known that the stakeholders can be contacted by auditor team.

Based on the stakeholder list document, it is known that these contacts can be contacted through interviews with representatives of internal and external stakeholders, for example, interviews with the Land Agency of Labuhanbatu Regency. The results of the interview can be seen in section 3.5 Summary of Arising Issues from Public and Auditor Verification.

Status: Comply

1.2

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

1.2.1

The company has policies related to a code of ethics for conducting business, preventing and eradicating money laundering, eradicating criminal acts of corruption and preventing and eradicating corruption as stated in the Company Policy - Company Code of Ethics, June 2019. This policy has been socialized to parties including workers, contractors, or the community, for example on July 4 2023 to 25 participants, including village representatives, contractors and other stakeholders.

Based on interviews with worker representatives and parties such as contractors and workers at the Mill, it is known that the code of ethics policy has been socialized regularly. The code of ethics policy can also be accessed freely via the company website. Thus, it can be concluded that the company has and has declared an honest and corruption-free business code of ethics which has been socialized to the public.

1.2.2

The company already has a system to monitor compliance and implementation of these policies by monitoring of complaint. Based in monitoring of complaint, known that there are no complaint related to code ethics violation. The company can show evidence of socialization of human rights, OHS, child protection, child labor, freedom of association, company code of ethics, sexual harassment policy and environmental policy on 06 Jul 2023 which is attended by 14 participants and all field workers (harvesting and maintenance) at Cabang Dua Estate.

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 list of laws or regulations is explained in the regulatory list document which already update in 2023 covering all management areas and every activity in unit of certification, with following aspect;

Environmental Aspects

- AMDAL document in accordance with the Decree of the Minister of Agriculture No. 054/ANDAL/RKL-RPL/BA/IV/95 dated 6 April 1995 concerning the approval of the ANDAL and RKL-RPL for oil palm plantations and their processing factories. The scope of the AMDAL study is an oil palm plantation covering an area of 5,000 Ha and a processing factory (PKS DLI 2) in Pangkatan Village, Bilah Hilir District.
- Revision of the Environmental Management Plan (RKL) and Environmental Monitoring Plan (RPL) documents for plantations, palm oil mills, composting and land applications. The document revision has been approved by the Environment Agency, Labuhan Batu Regency with Decree No. 660/46/SET-KOMISI/VIII/2009 dated 31 August 2009. The scope of the AMDAL document is PKS DLI 1, an oil palm plantation covering an area of 4,694.5 Ha and an additional processing plant (PKS DLI 2) in Sei Tampang Village with a capacity of 30 tons FFB/Hour.
- PT DLI's UKL/UPL documents for the oil palm plantation of Sei Deras Estate covering an area of 431.87 Ha which has been approved by the BLH Labuhanbatu Selatan Regency with SK No. 660/334/BLH/2//2014 dated 05 May 2014. (660/334/BLH/2//2015) and PT DLI's UKL/UPL documents for the oil palm plantation of Kebun Sei Deras covering an area of 445.88 Ha in accordance with SK BLH Labuhanbatu Regency with No. 660/21/BLH-LB/AM/2014 dated 12 February 2014.
- Environmental permit according to Decree of the District Head of Labuhanbatu Number 503.660/326/BLH-LB/2014 dated December 30, 2014 concerning Environmental Permit for Plantation Activities and Palm Oil Mills Wonosari, Sei Tampang Village, Bilah Hilir District, Labuhanbatu Regency By PT Daya Labuhan Indah.
- PT Perkebunan Milano - UKL-UPL Revised environmental permit PT Perkebunan Milano Oil Palm Plantation Cabang Dua in Sei Nahodaris Village, Panai Tengah District, Labuhan Batu Regency, Sumatra Utara Province, based on Decree of the Head of Environmental Agency of Labuhan Batu Regency No. 660/44/BLH-LB/AM/2011 dated 02 February 2012 for an estate area for 654.33 Ha.
- Permit for disposing of liquid waste into water bodies (IPLC) based on the Decree of the Head of Investment and One-Stop Services Office of Kab. Labuhanbatu No: 503.660.31/266/DPMPSTP-BP2MNP/2018 dated 4 May 2018 concerning Extension of the validity period of permits for discharging waste to water or to water sources at the palm oil mill (PKS) PT. Daya Labuhan

Indah – Wonosari in Sei Tampang Village, Bilah Hilir District, Labuhanbatu Regency.

- Hazardous Waste Storage Permit (Wonosari Estate) based on Decree of the Head of DPMPTSP Number 503.660.3/214/DPMPTSP-BP2MNP/2019 on April 1, 2019 which is valid for 5 years.
- Hazardous Waste Storage Permit (DLI POM-02) based on Decree of the Head of DPMPTSP Number 503.660.3/409/DPMPTSP-BP2MNP/2021 May 2021 which is valid for 5 years.
- Hazardous Waste Storage Permit (Cabang Dua Estate) based on Decree of the Head of the Labuhan Batu Regency DPMPTSP No. 503.660.3/140/DPMPTSP-BP2MNP/2019 dated 26 February 2019 valid for up to 5 years.
- Surface Water Utilization Permit issued by the BPPT for Sumatra Utara Province No. 610/116/BPPTSU/2/12.1/X/2014 dated October 14, 2017. and is valid for 3 years from the date of stipulation. The license expired in October 2020.

The company has shown Letter No. 004/PKS-DLI2/SP/X/2020 dated 01 October 2020 concerning Application for Surface Water Technical Recommendations from PT Daya Labuhan Indah POM Wonosari to the Head of the Water Resources Office Cipta Karya and Spatial Planning of Sumatra Utara Province which was received on 01 October 2020.

Until the ASA 1.4 assessment is carried out, the company can show the progress of obtaining permits through a feasibility study follow-up letter with No. G10/PJSA/V/1332/2023 from the Office of Water Resources, Cipta Karya and Spatial Planning of Sumatra Utara Province on 23 May 2023 stating that all documents have been verified and declared appropriate, for further processing of permits. Based on this description, companies have the opportunity to ensure that permits are fulfilled in accordance with applicable legal obligations. **OFI**

Best management practice Aspects

- The company doesn't use fire for pest control.
- The company does not use invasive species that are introduced according to the regulations in force in the managed area.
- The company has used registered pesticides.
- The company has referred to the laws and regulations regarding the Management of Hazardous and Toxic Materials.
- The company has used certified seeds.

Legal Aspects:

Land Use Title

The HGU area consist of several certificates, that are :

- PT DLI → HGU Certificate No. 1 of 1992 on a land area of 4,694.5 hectares (located in Bilah Village, Bilah Hilir District, Labuhanbatu Regency, Sumatra Utara Province). The validity period of the HGU certificate is until December 31, 2022.
- CDE → HGU Certificate No. 2 of 1996 on a land area of 654.33 Ha (located in Sei Nahodaris Village, Panai Tengah District, Labuhanbatu Regency, Sumatra Utara Province). The validity period of the HGU certificate is until August 2021.

Manpower Aspect:

- UoC has implemented a minimum wage and the fulfillment of overtime wages.
- UoC already has and implements a pay scale structure in accordance with Minister of Manpower Regulation No. 01 of 2017.
- There was no illegal worker, underage labor and forced labor systems.
- UoC has registered all workers in health insurance and social security insurance.
- Employment Report of 2023 which was reported online on 07 July 2022 with registration number 20221229.0001.

2.1.2

The unit of certification already has a law register document which contains relevant regulations relating to operational activities. The law register is divided into four parts, namely:

- Environment Sector (*Daftar Peraturan dan Perundangan Lingkungan Hidup*, document number FRM-GEN-026-031, revision 07, revision date 20 June 2023)
- Manpower Sector (*Daftar Peraturan dan Perundangan Ketenagakerjaan*), document number FRM-GEN-026-031, revision 08, revision date 20 June 2023)
- Plantation Sector (*Daftar Peraturan dan Perundangan Terkait Perusahaan Perkebunan*), document number FRM-GEN-026-031, revision 11, revision date January 2022)
- OHS Sector (*Daftar Peraturan dan Perundangan Keselamatan dan Kesehatan Kerja*), document number FRM-GEN-026-031,

revision 12, revision date 20 June 2023)

The regulations cover aspects of agribusiness, employment, environment, and other regulations related to the company operational activities i.e:

- PP No. 35 of 2021 concerning Specific Time Work Agreements, outsourcing, working hours, rest periods, and layoffs.
- PP No 36 of 2021 concerning Wages.
- Decree of the Governor regarding the Provincial Minimum Wage for 2023.

Sustainability Department and legal staff must actively check and coordinate with Government Agencies or Agencies. The monitoring and updating of laws and regulations is carried out every Semester by the respective Managers. The company also has personnel responsible for identifying legal requirements and ensuring compliance. 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, at which time the audit is carried out in conjunction with inspections related to compliance with the relevant regulations. Sources of Laws and Regulations come from Industry Associations; Public Media; Government agencies; and others.

The unit of certification also conducts work evaluations for contractors in the company's operational area regarding compliance with applicable laws and regulations in Indonesia, as described in indicator 2.2.2.

2.1.3

The company has procedures for monitoring and maintaining HGU boundary markers as stated in SOP for Maintenance of HGU Boundaries No. SOP-BM.LING-007 revision 00 dated 3 November 2011. The procedure states that maintenance is carried out by Bina Mitra and Security where monitoring of HGU boundaries is carried out once every four months.

The company can show a map of the location and coordinates where the HGU boundary markers are placed, obtained from BPN. The company also shows documents monitoring HGU poles which will be carried out in 2023. The pole maintenance report has provided complete information regarding pole numbers, plans and realization of stake maintenance, pole locations, pole coordinates, and photo documentation of pole conditions. In the monitoring report, it is known that all HGU poles are well maintained.

Field observations of several samples of HGU boundary markers at Sei Deras Estate (Pole VIII and IX) and Wonosari Estate (Pole VI, VII and VIII), show that the HGU boundary markers sampled are available in the field and are in well-maintained condition. Verification using GPS shows that the coordinates of the HGU pole location are in accordance with the HGU certificate.

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

List of all contractors updated June 2023, including contractors for transporting hazardous waste and maintenance of mill machinery, has been maintained by the certification unit. In monitoring the use of contractors for estate and mill activities, the certification unit has properly documented the list of contractors, number of employees owned, contact persons, work agreements, and ensured other matters related to compliance with laws and regulations in Indonesia. It was further explained that the document also includes a list of stakeholders in the area. Based on document verification, there are 4 contractors in Cabang Dua Estate and 11 contractors in PT DLI. For example, Agreement No. 018/MLN-CDE/SPK/VI/2023 between PT Perkebunan Milano with CV Chira Maju Berkah dated 01 June 2023.

2.2.2; 2.2.3

All contracts, including contracts with FFB suppliers, have separate clauses regarding fulfillment of relevant legal obligations, and can be verified by the third party concerned. For example, Contract between PT Perkebunan Milano and CV Chira Maju Berkah number 018/MLN-CDE/SPK/VI/2023 dated 01 June 2023 concerning the Transportation of FFB which is valid until 30 June 2023. The contract has explained the rights and obligations of both parties, such as wages, OHS, Insurance, payment term etc. The contract also explains: the prohibition of employing children under the age of 18, forced labor and human trafficking, gambling, drugs, immorality, alcohol and customs rules.

There is a list of workers for 3 people, proof of payment of wages that are in accordance with the minimum wage with a daily wage of IDR 124,660, proof of Insurance payment (BPJS) for the period June 2023 and driver's licenses and contracts with drivers, for example

Contract number 000/2023 dated June 2, 2023 between CV Chira Maju Perkasa and DZ. The contract explains the type of work, rights and obligations, wages according to the minimum wage, OHS and insurance, available driving licenses for example Licence number 0720-7901-000011 which is valid until January 26, 2026 on behalf of MZD.		
	Status: Comply	
2.3		
All FFB supplies from outside of the unit of certification are from legal sources.		
2.3.1; 2.3.2		
Until surveillance 1.4 is carried out, the unit of certification does not receive FFB from suppliers and all FFB received is RSPO certified. The results of supply chain document verification and interviews at the FFB reception location (security and weighbridge operator) revealed that FFB entering DLI 2 POM came from own plantations (Wonosari Estate, Sei Deras Estate) and PT Perkebunan Milano among others Cabang Dua Estate (Supply base of DLI 2 POM) and Merbau Estate which RSPO certified with certificate register No. 824 502 14010.		
	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		
Long Term Plan (5 years) PT Daya Labuhan Indah long-term 5-year plan is contained in the document "Crops and Production Projections for 5 years (2023-2028)". Some of the parameters that are estimated include production targets (FFB, CPO & PK), workforce plans, as well as development plans, estimated prices, estimated production costs and other factors. The long-term plan explains that in 2023 FFB production is estimated at 133,050 Tons (OER target of 19.08% and KER 4.19%) and in 2024 it will increase to 133,200 Tons (OER target of 19.09% and KER 4.18%).		
3.1.2		
The results of the study of the area statement document and field observations, it is known that the distribution of planting years in the company is between 2009 – 2017 and the company does not have a replanting plan for the next 5 years		
3.1.3		
Evaluation/Management Review The company has shown the management review implementation documents of PT DLI, POM DLI2, and PT.Milano CDE for system implementation in 2023 which was signed by MR. The Management Review Activity was carried out on July 6, 2023. In summary, the activity discussed the implementation of a quality management system, Environment, OHS and RSPO & ISPO certification requirements, where some non-conformities have been found and repairs have been made to these non-conformities. The Management Review was held in the Wonosari Estate meeting room which was attended by each unit of PT. DLI, KWS, and Milano-CDE with a total of 20 participants.		
	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		
Environmental Aspects		
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:		
<ul style="list-style-type: none"> Management and monitoring of fires in company border areas that benefit the community. The 2022 HCV Management Plan improved in terms of both the quantity and the quality of monitoring. Ambient in air quality management and monitoring through road maintenance, air quality testing and reporting to the 		

Environmental Agency

- Management and monitoring of surface water through testing ground water quality and reporting it to the Environmental Agency
- Hazardous waste management through Hazardous Waste Storage in permitted, management and monitoring of Hazardous waste also reported to the Environmental Agency.
- Greenhouse Gas (GHG) Management. Implement a zero-burning policy, regular engine maintenance, and regular emission quality tests.
- Company participation in the PROPER program with a blue predicate for the 2021-2022 period.
- Internal audits

Best management practice Aspects

- The company no longer uses pesticides with the active ingredient paraquat dichloride.
- The company has implemented integrated pest control including using beneficial plants, installing barn owl boxes, and installing pheromone traps.
- There is no clearing of land by burning

Manpower Aspect:

- UoC has implemented a minimum wage and the fulfillment of overtime wages.
- UoC already has and implements a pay scale structure in accordance with Minister of Manpower Regulation No. 01 of 2017.
- There was no illegal worker, underage labor and forced labor systems.
- UoC has registered all workers in health insurance and social security insurance.
- Employment Report of 2023 which was reported online on 07 July 2022 with registration number 20221229.0001.

3.2.2

The company has shown the auditor regarding the RSPO metric template Version 2.1 for the period of 2022 that has been filled in according to the facts and data in the company's record documents. Based on the team auditor's review, the information has been matched with other documents, total planted area, demographic workers, HCV area, FFB productions, work accidents, etc.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The certification unit already has Mill and Estate SOPs, for example:

- Procedure for oil palm processing are presented in document No. SOP-MILL-001 to No. SOP-MILL-044, with the most updated was dated on 05 December 2017. The procedure has covers FFB acceptance, FFB Grading, Weigh Bridge, FFB processing, laboratory works, operational on processing Stations (Loading Ramp, Sterilizer, Thresher, Digester, Screw Press, Vibrating Screen, Crude Oil Tank, Decanter, Oil Tank, Sludge Tank, Depericarater, Nut Silo, Ripple Mill, LTDS, Claybath and Kernel Silo), dispatch of CPO and kernel, transportation and supply chain management system.
- Procedure for oil palm agronomy are presented in document No. PRO-EST-001 to PRO-EST-018, with the most updated was dated on 01 April 2019. The procedure has covers nursery, legume cover crop, replanting, field upkeep, harvesting, as well as integrated pest and disease management.
- Procedure of safety are presented in several documents such as No. PRO-EHS-14 dated 01 March 2012 and No. PRO-GEN-013 dated 01 July 2012 about emergency situation including first aid, No. SOP-GEN-002 dated 01 February 2015 about HIRAC and No. FRM-GEN-068 about fire monitoring. Further detail on safety working procedure is described in Hazard Identification Risk Assessment Control (HIRAC) and Material Safety Data Sheet (MSDS) of agrochemicals.

Based on the results of field observations and interviews with Harvest workers and Sterilizer Station workers, it is known that workers already have an understanding of work procedures in their respective work areas.

3.3.2

The company already has a mechanism to monitor the implementation of procedures consistently, including those contained in the following documents:

- Internal Audit Procedure No. SOP-GEN-015 Revision 2 dated August 1, 2015, briefly explains that Internal Audit is conducted

periodically, which is once a year.

- Internal Audit Procedure No. PRO-GEN-003 dated August 1, 2016, briefly explains one of them for PT Perkebunan Milano in general, internal audit is carried out at least once a year.

The company has conducted an internal RSPO/ISPO audit which was conducted on 7 – 8 June 2023 by an internal auditor who has received RSPO/ISPO training. Based on the results of the internal audit, it is known that there are 5 discrepancies in the Wonosari Estate and 8 discrepancies in the Sei Deras Estate.

3.3.3

The company has conducted an internal RSPO/ISPO audit which was conducted on 7 – 8 June 2023 by an internal auditor who has received RSPO/ISPO training. Based on the results of the internal audit, it is known that there are 5 discrepancies in the Wonosari Estate and 8 discrepancies in the Sei Deras Estate,

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; 3.4.2

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. The unit of certification does not carry out new plantings or increase the scope of certification. Some of the documents held by the certification unit, include:

Environmental Impact Assessment (EIA)

The management unit does not carry out new operations, either new plantings or new operations of POM. The entire impact of environmental management and monitoring is still the same as the previous audit activity. The unit of certification has four environment impact assessment documents were approved by Head of Labuhanbatu District Environmental Agency, covering different area with the following details:

- ANDAL for estate area of 4,694.5 ha in 2009 and 30 tonne FFB/hour
- UKL/UPL for Sei Deras estate covered 445.88 ha in 2014
- UKL/UPL for Sei Deras estate covered 431.87 ha in 2014
- UKL/UPL for Cabang Dua estate covered 654.33 ha in 2012

Reports on the implementation of management and monitoring for the 2022 period according to the matrix carried out by the company, including:

- POME and Surface Water
- Solid waste
- Hazardous waste
- Emissions and Ambien Air Quality
- Noise
- Smell
- Disturbance of protected flora and fauna
- Potential impact of land fires
- Community Attitudes and Perceptions
- Employment Opportunity Impact
- Impact of Health Disorders
- Changes in Function and Characteristics of Land.

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

- Proof of sending the *RKL-RPL* Semester 1 report 2023 (No.051/DLI/KSD/Ext/VII/2023) to the Head of *DLH* Labuhanbatu Regency, Sumatra Utara Province on June 6, 2023.
- Proof of delivery of the *RKL-RPL* Semester 2 of 2022 report (No. 015/DLI/KSD/Ext/II/2022) to the Head of *DLH* Labuhanbatu Regency, Sumatra Utara Province on January 20, 2022.

The unit of certification has identified protected, rare, rare, or endangered species, and habitats with high conservation value in 2013 at PT Daya Labuhan Indah. The HCV identification activity was carried out using the HCV toolkit and involved stakeholder participation through a public consultation conducted on 6 May 2013. And PT Perkebunan Milano (Cabang Dua Estate) in July 2009. The result of identification is total area of HCV in the unit of certification is 11.73 Ha.

Social Impact Assessment (SIA)

PT DLI and PT Milano has conduct social impact assessment by independent consultant. The scope of study are impact of plantation and mill operation to workers and community surrounding company areas. These assessments also identified negative and positive impact of plantation and mill operation towards social aspect.

Based on document review shown that current SIA has describing and identified potential social impact related vulnerable groups, community perception, environment and health, local economy, land use changes, livestock intrusion by shepherd, workers facilities and etc. SIA identifications were also done based on affected parties' consultation, this matter is amplified by stakeholders e.g Sei Tampang and Bilah villagers during stakeholder consultation and besides that based on interview with local community shown that major impacts have been identified and managed by company. In addition, the SIA review activity has involved elements of internal stakeholders consisting of Trade Unions and Workers Representatives.

The unit of certification also has established management plan and monitoring plan related for social & environment impact based on the impact identification period of 2022 – 2024. This plan was developed with participation affected stakeholders dated 2 January 2022. This plan has been informed the positive and negative impact including management planning time frame and the person in charge for the activity, such as:

External Issues

- Employee recruitment: the job opportunity for nearby communities.
- Communication with stakeholders: the respond letter from company are need much time.
- Reporting of community activities on the estate: the village board didn't know: if any "*kenduri*" on emplacement.
- Company transport: there is dust in the village through which FFB, CPO, and PK transports.
- CSR: CSR on infrastructure and religious aspect needs to be improved.

3.4.3

Environmental Impact Assessment

Based on the results of document verification, it can be concluded that all management and monitoring parameters requested in environmental documents have been implemented. Based on the results of the evaluation, it is known that all parameters are still appropriate by the related Quality Standards, and there is no indication of contamination.

The implementation of environmental management has been carried out in accordance with all RKL-RPL documents and Environmental Permits owned by the unit of certification. The certification unit makes RKL-RPL reports based on attachment of Environmental Permit where the matrix is a compilation of all previously owned.

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

The unit of certification has carried out activities in order to maintain protected areas and High Conservation Values that has been stated in the 2020-2023 HCV Management Plan document with management scope and targets update every year which implemented in line according with the HCV management and monitoring plan period 2023 also reviewed periodically every year involved consultation with relevant stakeholders such as villagers around.

Social Impact Assessment (SIA)

The company has managed and monitored social impacts in accordance with what has been stated in the Social Impact Monitoring Report year period of 2021-2022. In general, social impact management activities have been carried out with the aim of reducing the identified negative impacts.

Based on SIA monitoring, it is known that the unit of certification has implemented social management programs through the CSR programs that have been implemented in 2022 for social, health, infrastructure, and economic aspect.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1

The company has a recruitment procedure as stated in the document number SOP-HRD-004, Promotion Policy No. 043/CEO-WIP/SKD-VI/2014, as well as the 2021-2023 Collective Labor Agreement between the company and the Labor Union. In the document, clauses have been set regarding the mechanism and process of recruitment, transfer and promotion, and termination of employment in accordance with Law Number 13 of 2013 regarding employment.

Based on a review of recruitment documents and agreements, as well as interviews with workers and labor unions, the recruitment, promotion and retirement procedures have been well socialized and implemented. There is no discrimination related to these processes, where the assessment of applications and promotions is based on the requirements and assessment of competence and merit, which have been described in previous vacancies. There is no differentiation of rights and obligations in the same type of work.

3.5.2

Employment procedures have been regulated in the Collective Labor Agreement (PKB) for the period 2021 – 2023, ratified on January 24, 2022 by the Manpower Office number 550/0212/DTK-4/2022. The CLA regulates the rights and responsibilities of companies and workers, permanent employee appointment, recruitment processes, promotions and demotions, working time management, payment systems, social insurance, termination of contracts, and so on. Based on interviews with workers, it is known that they understand the rights and obligations of workers as stated in the collective labor agreement. This has been disseminated to workers by management representatives.

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

- Recruitment document in accordance with the recruitment requirements such as employment request form, application letter, statement of police report, identity card (KTP), family identity card (KK), result of written test, result of interview test, and work agreement letter. For example, a worker on behalf of JW (initial) who started working on 01 March 2023 (Letter Number 001/HRR-DLI/SK/III/2023).
- Termination document such as the management decree of employment's termination on behalf of USN (initial). The company also showed other supporting documents such as the management decree of employment's termination, debt certificate, calculation of termination payments, and proof of its payment in accordance with the applicable laws.
- Promotion documents such as management decree for worker's promotion. For example, a worker on behalf of FRD (initial) who had a promotion based on worker's appraisal based on 3 criteria, namely: ability to work, how to work, and self-management. FRD promote from group 2C to 2D (Harvest foreman) according to HRR Manager Decree number 003/DLI-HRR/SK/I/2023 dated 23 January 2023.

Based on this explanation, the company has been able to show evidence of the implementation of the employee assessment.

Status: Comply

3.6

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

3.6.1

The company shows risk identification documents for all activities at the Mill and Estate which are contained in the Identification,

Assessment and Control of OHS and Environmental Risk Potential Hazards for the January 2023 period which informs Work Locations, Job Descriptions, Conditions, Hazard Sources, Impacts, Initial Risks, Controls existing hazards, current risks, planned hazard controls, and ultimate risks.

The company has shown the Hazard Identification & Risk Assessment (HIRA-SHE) document of PT. Daya Labuhan Indah HIRA which is owned by the company made per each type of work performed by the company for each business unit. The examples are as follows:

1. HIRA Harvest under power lines
2. HiRA fertilization
3. HiRA boilers

The company has also shown the HIRA Outreach implementation documents owned by the company for each unit, both estate and mill, for example:

1. Dissemination of aspects of the impact on workers explaining the risks to the nature of workers. The KWS Training was held on January 7, 2023.
2. Dissemination of aspects of the impact on workers explaining the risks to the nature of workers The KSD Training was held on January 7, 2023.
3. Socialization of policies and OSH, for example socialization of PKS hira, will be held on June 2, 2023.
4. Dissemination of aspects of the impact on workers explaining the risks to the nature of CDS workers was carried out on September 8, 2022.

Based on the results of field visits and interviews with workers, for example at PKS St. Boilers and activities in the estate know that workers have understood the sources of danger and risk in their work area and have used PPE in accordance with those specified in the Hazard Identification, Risk Analysis and Risk Control documents.

Thus, it can be concluded that the company has demonstrated that all operational activities have been assessed for risk to identify OHS problems and mitigation plans and procedures are documented and implemented.

3.6.2

The company demonstrates monitoring of OHS effectiveness, including through routine inspections of emergency response facilities and infrastructure including fire extinguishers, hydrants, first aid kits and bags, OHS testing and inspection of equipment and machinery, monitoring of worker certificates and licenses as well as health checks for workers.

The company shows records of health checks including:

- Cholinesterase examination results of PT Daya Labuhan Indah Sei Deras in 2022 from Sri Pamela Torgamba Hospital on 16 June 2023 for 43 workers.
- The results of the Cholinesterase examination by PT Daya Labuhan Indah Wonosari in 2023 from the Sri Pamela Torgamba Hospital on June 15 2023 for 31 workers.
- Summary of PT DLI PKS MCU Results from Prodia Clinical Laboratory on 22 -10- 2022, carried out to 96 workers with GOT, GPT and Audiometry examinations. The conclusion of the inspection results states that all workers are declared fit to work.
- Cholinesterase examination results of PT Daya Labuhan Cabang Dua Estate in 2023 from Sri Pamela Torgamba Hospital on 14 June 2023 for 15 workers.

Follow-up actions are carried out for workers who are affected by the disturbance, for example:

- The initials KS underwent a CHE KWS examination with a diagnosis of cardiomegaly. It was suggested not to spray until waiting for his health condition to return, use PPE, re-examine every 6 months.
- Initial YL was examined by CHE KSD with a diagnosis of cardiomegaly. It was suggested not to spray until waiting for his health condition to return, use PPE, re-examine every 6 months.
- The initial SH was examined at the POM station Engine room with an Audiometry diagnosis. It was suggested to rest and eat nutritious food and wait for his health condition to return, use PPE, re-examine every 6 months.

Based on the results of interviews with workers (harvesters, pesticide applicators, and process operators) at KWS, KSD, PKS DLI 2, CDE it is known that every day during the morning assembly, supervisors will check the completeness of PPE for workers and will provide safety briefings.

Based on the explanation above, it can be concluded that the unit of certification has monitored the effectiveness of the OSH plan to deal with OSH risks in humans.

Status: Comply

3.7

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

3.7.1 & 3.7.2

The company showed the Training Program for each unit in 2023 that cover all operational and RSPO aspects, such as agronomic best practices, chemical/pesticide handling, OHS, and the environment management. The training program also covers parties who need training such as staff, workers, and contractors. The training programs such as:

- Pesticide Training
- Manuring Training
- IPM Training
- Hazardous waste management Training
- First aid Training
- Mill waste management Training
- Conservation Training
- Etc.

The certification unit has properly documented every training activity and socialization that has been carried out to workers and related stakeholders. The following is an example of training/socialization documentation that has been carried out, namely:

- Socialization of human rights, OHS, child protection, child labor, freedom of association, company code of ethics, sexual harassment policy and environmental policy on 06 Jul 2023 which is attended by 14 participants and all field workers (harvesting and maintenance) at Cabang Dua Estate.
- Training of Procedure harvesting for workers in each estate in 2022.
- Training of Procedure Manuring for workers in each estate in 2022.
- IPM and Pest Monitoring System training on June 28, 2023 which was attended by 8 participants.
- Spraying training on May 20 2023 which was attended by spray workers.
- Confined space and hot work internal training and job safety analysis on March 14, 2022 which was attended by 14 participants.
- Etc.

3.7.3

Company provided an understanding of SCCS to weighbridge operators, sorting, sustainability, security, and laboratory on 18 January, 2023. The materials discussed included the definition of RSPO SCCS, new standards for RSPO SCCS, principles for compliance with RSPO SCCS. Based on interviews with weighbridge operators and security, it is known that they understand the supply chain process.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 & 3.8.2

The certification unit implemented two model of SCCS (Identity Preserved and Mass Balance). However, until surveillance 1.4 is carried out, the unit of certification does not receive FFB from non-certified suppliers and all FFB received is RSPO certified. The results of supply chain document verification and interviews at the FFB reception location (security and weighbridge operator) revealed that FFB entering DLI 2 POM came from own plantations (Wonosari Estate, Sei Deras Estate) and PT Perkebunan Milano among others Cabang Dua Estate (Supply base of DLI 2 POM) and Merbau Estate which RSPO certified with certificate register No. 824 502 14010.

3.8.3

Estimated certified product recorded in the last assessment report. Actual certified produced has been verified during this assessment and not exceed the estimate. The estimates of certified production for the next license period describe at ASA-1.4 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 (8 November 2022 to 7 December 2023) (MT)	Last Year Actual Certified Volume (July 2022 – June 2023) (MT)
FFB Processed IP	138,871	134,346.96
FFB Processed MB	7,309	-
CPO Production IP	30,550	26,330.11
CPO Production MB	1,600	-
PK Production IP	5,550	4,495.89
PK Production MB	290	-

3.8.4

The mill has been registered in IT platform palm trace RSPO <https://palmtrace.rspo.org/web/rspo/member-directory> which information as follows:

- Member Name: PT. Daya Labuhan Indah
- License ID: CB140041
- Commodity: Palm Oil
- Member ID: RSPO_PO1000002132
- RSPO Membership Number: 2-0017-05-000-00
- Type of Business: Oil Mill
- Supply chain model: Identity Preserved, Mass Balance

3.8.5

Daya Labuhan Indah Mill had procedure for SCCS with MB and IP model in SOP of FFB, CPO, PK weighbridge (document No. SOP-MIL-002 revision of 8 issued on 1 February 2020), Traceability procedure (No. SOP-MILL-034, Revision 08, dated 1 February 2020), CPO and PK Shipment Procedure (No. SOP-MILL-035, Revision 08, dated 1 February 2020), SOP No. SOP-MILL-038, Revision 07, dated 1 February 2020.

During this ASA 1.4 audit found that DLI-2 POM only received FFB from certified sources. So they only implemented Module Identity Preserved.

Auditors conduct interviews with workers who are responsible for the delivery of certified products, namely weighing operators. Operators are able to explain the technical acceptance of certified FFB, sales of CPO/PK and also the reporting mechanism if there is an error in recording information.

3.8.6

Procedures regarding internal audit are listed in the in Procedure No. SOP-GEN-015 dated on August, 18 2020. The procedure explain that internal audit that conducted once a year.

Based on document review, the company show the record evidence regarding internal audit of RSPO SCCS that conducted on 7-8 June 2023. Management Review of RSPO SCCS implementation conducted on 6 July 2023. The management review discussion has covered the input from internal audit result, operational conditions, certification audits, previous management reviews and others.

3.8.7

The mill has verified and documented the volumes of certified and non-certified FFBs received. Certified FFB received period of July 2022 to June 2023:

Period	FFB (ton)		Total
	Certified	Non Certified	
July 2022 to June 2023	134,048.05	-	134,048.05

Estimated certified product recorded in the last assessment report (ASA 1.3). Actual certified produced has been verified during this assessment. The data are shown in the following table:

Products	Last Year Projected Certified Volume (8 November 2022 to 7 December 2023) (MT)	Last Year Actual Certified Volume (July 2022 – June 2023) (MT)
FFB Processed IP	138,871	134,346.96
FFB Processed MB	7,309	-
CPO Production IP	30,550	26,330.11
CPO Production MB	1,600	-
PK Production IP	5,550	4,495.89
PK Production MB	290	-

The SOP of handling non-conforming FFB received describe in SOP of FFB Receive (No. SOP-MIL-001 dated 1 February 2020) which explains the implementation stages of receiving FFB to ensure that the FFB received at the Mill is in accordance with procedures.

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 10 July 2023. The information provided on invoices are:

- The name and address of the buyer (PT Multimas Nabati Asahan – Kuala Tanjung);
- The name and address of the seller (PT Daya Labuhan Indah – Labuhanbatu District);
- The loading or shipment / delivery date (10 July 2023);
- A description of the product supply chain model (Identity Preserved);
- The date on which the documents were issued (10 July 2023);
- The quantity of the products delivered (4.9 ton);
- Any related transport documentation (transport by PT Sumaterasarana Sekar Sakti);
- A unique identification number (DB12120471AA);
- RSPO certificate number (Mutu-RSPO/047);
- etc.

3.8.9; 3.8.10 & 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. The buyer of the certified product is PT Multimas Nabati Asahan. In this regard, the company shows evidence of the Instruction Letter. For example, Instruction Letter No. 1260096382 from PT Multimas Nabati Asahan addressed to PT Sumaterasarana Sekar Sakti that inform the locations of the certified product will transported to Kuala Tanjung Mill.

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 mill procedure, retention time for all records and report, including regarding to supply chain are kept for 2 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 (July 2022 to June 2023):

CSPO

Month	CPO (ton)		Total
	Certified	Non-Certified	
Opening Stock	436.00	-	436.00
July 2022 to June 2023	26,330.11	-	26,330.11
Total	26,766.11	-	26,766.11

Month	CSPO Despatch (ton)			Total
	RSPO	Other Scheme	Non-Certified	
July 2022 to June 2023	26,479.82	-	-	26,479.82

CSPK

Month	PK (ton)		Total
	Certified	Non-Certified	
Opening Stock	73.33	-	73.33
July 2022 to June 2023	4,495.89	-	4,495.89
Total	4,569.22	-	4,569.22

Month	CSPK Despatch (ton)			Total
	RSPO	Other Scheme	Non-Certified	
July 2022 to June 2023	4,449.93	-	-	4,449.93

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 July 2022 until June 2023 i.e OER 19.60% and KER 3.35%. Periodically update of extraction is actual extraction.

3.8.15

SCSS module used in DLI 2 POM is Identity Preserved, because the mill receives FFB from the estate RSPO certified.

3.8.16

RSPO IT Platform member registration number for DLI 2 POM is RSPO_PO1000002132. 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 PK sold to PT Multimas Nabati Asahan dated 17 June 2023 for 75 MT and transaction creates in IT Palm Trace dated 07 July 2023.
- Certified CPO sold to PT Multimas Nabati Asahan dated 28 June 2022 for 250 MT and transaction creates in IT Palm Trace dated 07 July 2022.

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 a policy to respect human rights as stated in Wilmar's policy, namely the Zero Deforestation, Zero Peat, Zero Exploitation Policy which was ratified on November 2019 explaining, among other things:

1. The Company respects and supports the Universal Declaration of Human Rights by committing to uphold and promote the general declaration of human rights for all employees, contractors, indigenous and tribal peoples, local communities and anyone impact by operational activities in accordance with the overall scope of this policy
2. Respect and recognize the rights of all employees including contract workers, temporary employees and migrant workers with a commitment to ensure that the rights of everyone who works in all operational activities that fall within the scope of this policy are respected in accordance with local laws and regulations, national and international best if the legal framework has not yet been established.

The company can show evidence of socialization of human rights, OHS, child protection, child labor, freedom of association, company code of ethics, sexual harassment policy and environmental policy on 06 Jul 2023 which is attended by 14 participants and all field workers (harvesting and maintenance) at Cabang Dua Estate.

Based on this explanation, the company has a policy that respects human rights.

4.1.2

The company has a policy to prevent violence, both sexual and other forms of action, explaining, among other things, that the company provides a conducive work environment characterized by equality and mutual respect and if there are allegations of sexual harassment, violence and abuse, and violations of reproductive rights are proven, the company will act fairly in applying appropriate sanctions, until the perpetrator is removed from the company.

The results of interviews with representatives of workers and local communities, there are no complaints about violence within the company's operational scope. In addition, from the results of the review of the complaint document, no employee or external complaints were found regarding the violence perpetrated by the company.

Based on this explanation, it can be concluded that the company has implemented a policy to prevent the prohibition of violence, both sexual and other forms of action.

Status: Comply

4.2

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

4.2.1

The company has a complaint mechanism that respects identity protection as stated in the SOP for receiving complaints and resolving disputes with document number SOP-BNM-009 at point 6.2 explaining, among other things, that the company guarantees the confidentiality of the identity of the reporter and whistleblower by looking at the sensitivity of the issue, the scale of the impact if the issue is made public, or the risk of retaliation.

The procedure also explains that the results of the decisions taken by the Leaders are returned to the Bina Mitra Manager, if the results of the analysis are approved by the leadership, then they are forwarded to the stakeholders, but if the results of the analysis are not approved by the Leaders, they are returned to the Bina Mitra Manager to be discussed through deliberation and consensus.

The company also has a Grievance Procedure for The Implementation of Wilmar's No Deforestation, No Peat, No Exploitation (NDPE)

Policy updated version 2.0 June 2019. At point 4.2 in the document, it is explained about the Protection of Human Rights Defenders, Whistleblowers, Complainants and Community Spokespersons. At point 5.1.3, also explained about complaints cases that are investigated through external mechanisms such as the RSPO complaints procedure.

4.2.2

From the results of interviews with the company, affected parties who are unable to read and write the company have representatives as communicators for liaison between the company and the community and other parties. Based on interviews with representative communities, it was explained that community representatives had understood the complaint procedure.

4.2.3

Based on the review of the procedure for receiving complaints and resolving disputes at number SOP-BNM-009, it is explained that the company provides a constructive and immediate response to receiving complaints and handling conflicts that come from stakeholders.

Based on interview with Gender Committee, labor union and Bipartite known that grievance and complaint has has been followed up by management. Grievances and complaints from the internet have been responded to by management and the update has been verified by the auditor.

4.2.4

In the procedure for receiving complaints and resolving disputes at number SOP-BNM-009, point 6.8 explains, among other things, that the results of decisions that have been taken by the company are submitted to stakeholders, if the results of these decisions are not approved by stakeholders, then a peaceful way is taken with assistance. The local government acts as a facilitator and at point 6.9 if it does not produce results, then legal action is taken according to the applicable law in Indonesia.

In Indonesia, giving freedom to reporting parties to obtain legal and technical assistance from independent parties is permissible and there are no regulations/procedures in the unit of certification that prohibit it. Based on the results of interviews with representatives of surrounding villages, it is known that when residents have land disputes or claims with the certification unit, the community is given the freedom to ask for legal assistance and technical advice from independent parties such as lawyers and other parties to deal with this problem.

Status: Comply

4.3

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

4.3.1

Unit of certification carries out strategic planning and community development plans by involving the community through FGD activities to discuss community development work plans which are attended by the Village government, elderly and community representatives. In the preparation activity, there were several discussions related to community development work plans, including in the fields of cultural aspect, social aspect, and community development aspect. For example, the meeting held on January 25, 2023 was attended by 14 village representative participants from Sei Nohodaris Village, and meeting held on January 12 2023 was attended by 11 village representative participants from Kampung Bilah Village.

During the audit the company has shown the realization of the CSR program for the period of 2022, for example:

- Social and Economic: donation for old widows, natural disaster donation in Wonosari Village, local contractor empowerment program, bazar
- Education: honorariums to local teachers Kampung Billah Village
- Health: *posyandu* for toddlers
- Infrastructure: road maintenance (grading), road watering, bridge repair
- Religion: donation for isramiraj and chrismast
- Etc.

The results of interviews with representatives of the surrounding community (Kampung Bilah Village, Sei Tampang Village and Sei Nahodaris Village) known that the company has been realized assistances or CSR as a form of community development contribution and was carried out based on consultation with the community.

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

Total of certification scope area amount of 6,226.58 Ha, consist of 5,572.25 Ha PT Daya Labuhan Indah and 654.33 Ha PT Perkebunan Milano. The land title and plantation business permit of each unit are described as follows:

PT DLI

The total HGU of PT Daya Labuhan Indah is 4,694.5 hectares with details of HGU Certificate No. 1 issued by the Labuhanbatu Land Office on 29 September 1992 for an area of 4,694.5 Ha ending on 31 December 2022.

Based on the results of a document review, interviews with management and interviews with the Labuhanbatu Regency Land Office, it is known that the validity period of the HGU Certificate has expired on December 31, 2022.

The company shows:

- Letter from the Regional Office of the National Land Agency of Sumatra Utara Province to the Director General of Agrarian Infrastructure u.b. Director of Cadastral Measurement and Mapping of the Ministry of Agrarian Affairs and Spatial Planning, Number UK.01.01/191-12/1/2020, regarding Application for Measurement of HGU Extension No. 1381 former HGU No. 1 in the name of PT Daya Labuhan Indah covering an area of 4,694.5 Ha located in Kampung Bilah Village d/h Bilah Village, Bilah Hilir District, Labuhanbatu Regency, Sumatra Utara Province, dated January 10 2020, which among other things explains that in accordance with article 77 paragraph (1) letter b PMNA No.3 of 1997, the measurement authority lies with the Ministry of Agrarian Affairs and Spatial Planning/ BPN.
- Letter from the Ministry of Agrarian Affairs and Spatial Planning/ BPN Directorate General of Land and Spatial Surveying and Mapping to the Head of the Regional Office of the National Land Agency for Sumatra Utara Province, Number 180/SP-300.16.UK.01.01/IV/2023, regarding Lack of Application Files for Extension Measurement HGU No. 1381 former HGU No. 1 in the name of PT Daya Labuhan Indah covering an area of 4,694.5 Ha located in Kampung Bilah Village d/h Bilah Village, Bilah Hilir District, Labuhanbatu Regency, Sumatra Utara Province, dated June 16 2023, which includes explaining:
 - Whereas in order to complete the requirements for PT Daya Labuhan Indah's measurement application, there are several documents that must be completed (12 documents).
 - Because the HGU certificate has expired on 31 December 2022, the process for applying for rights is through a rights renewal mechanism for 2 years after the end of the HGU period in accordance with Minister of ATR/BPN Regulation Number 18 of 2021 Article 71 paragraph (2).
 - PT Daya Labuhan Indah's application can be followed up if the above conditions are met and existing land problems have been resolved.

During the audit activity, it was discovered that the Sumatra Utara Provincial BPN Team was conducting an HGU Map Study and field activities. (OFI)

CDE – PT Perkebunan Milano

The process for extending the HGU has resulted in the issuance of the Sector Map on December 10, 2020 with an area of 646.10 Ha. (The difference in area is due to differences in measurement methods, but for the actual location there is no change).

The company has the opportunity to ensure that the HGU renewal process is in accordance with the applicable laws and regulations.

Plantation Business Permit

- PT. Daya Labuhan Indah has had a plantation permit as follows:
 - **Plantation Business Permit for Processing (IUP-P)** covers **30 tons of FFB/hour** processing capacity, based on Labuhanbatu Regent Decree No. 180/27/Huk/2012, dated 12 October 2012.
 - **Plantation Business Permit (IUP)** covers **4,694.5 ha** area and **30 tons of FFB/hour** processing capacity, based on Labuhanbatu Regent Decree No. 180/100/Huk/2013, dated 28 March 2013.
- PT. Perkebunan Milano has had a plantation permit **Plantation Business Permit (IUP)** covers **654.33 ha** area, based on Labuhanbatu Regent Decree No. 180/21/Huk/2013, dated 4 April 2013.

Meanwhile, the non-HGU area also had a plantation permit as follows:

1. **Plantation Business Permit (IUP)** covers **445.88 ha** area, based on Labuhanbatu Regent Decree No. 180/102/HUK/2014, dated

8 April 2014.

2. **Plantation Business Permit (IUP)** covers **431.87 ha** area, based on Labuhanbatu Regent Decree No. 503/327/BPPTPM-LS/2014, dated 5 September 2014.

4.4.2; 4.4.4; 4.4.5

There was no new development and planting by PT DLI until the surveillance-1.4 assessment. According to land historical record, known that concession area of Wonosari and Sei Deras Estate (PT Daya Labuhan Indah) was owned by Asam Jawa Group and Cabang Dua Estate (owned by PT Perkebunan Milano) before took over by Karya Praja Nelayan Group (KPN Group). During year 2001, PT Perkebunan Milano was took over by Wilmar International Ltd. On 2005, Wilmar also took over PT Daya Labuhan Indah. After this process, there was no record of expansion by Wilmar.

Based on interviews with representatives of Sei Bilah Village and Sei Tampang Village, it is known that PT DLI and PT Perkebunan Milano are companies that were acquired by Wilmar from the previous company. From the interviews, information was also obtained that the land acquisition process is always based on the agreement of both parties and there is no intimidation to forcibly relinquish land ownership rights.

4.4.3

There was no new development and planting by PT DLI until the surveillance-1.4 assessment. According to land historical record, known that concession area of Wonosari and Sei Deras Estate (PT Daya Labuhan Indah) was owned by Asam Jawa Group and Cabang Dua Estate (owned by PT Perkebunan Milano) before took over by Karya Praja Nelayan Group (KPN Group). During year 2001, PT Perkebunan Milano was took over by Wilmar International Ltd. On 2005, Wilmar also took over PT Daya Labuhan Indah. After this process, there was no record of expansion by Wilmar.

Based on interviews with representatives of Sei Bilah Village and Sei Tampang Village, it is known that PT DLI and PT Perkebunan Milano are companies that were acquired by Wilmar from the previous company. From the interviews, information was also obtained that the land acquisition process is always based on the agreement of both parties and there is no intimidation to forcibly relinquish land ownership rights.

From the results of interviews with relevant stakeholders, it is known that there is no customary land in the unit of certification's operational area. Based on the review of the HGU map document which has referred to the map of land rights owned, there is no information on the existence of customary rights and other rights over the legality of the land owned by the company.

4.4.6

The company has several policies, as well as SIA management and monitoring plan, that has some purposes. One of them to review agreement with affected parties such as acceptance of local workers if needed, CSR assistance etc. Based on interview with surrounding communities known that company has provided village with economic development program and any other CSR programs.

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 – 4.5.8

The results of the verification of legality documents and interviews with relevant stakeholders, it is known that there are no new development areas or no new planting in the scope of certification until the surveillance-1.4 assessment. According to land historical record, known that concession area of Wonosari and Sei Deras Estate (PT Daya Labuhan Indah) was owned by Asam Jawa Group and Cabang Dua Estate (owned by PT Perkebunan Milano) before took over by Karya Praja Nelayan Group (KPN Group). During year 2001, PT Perkebunan Milano was taken over by Wilmar International Ltd. On 2005, Wilmar also took over PT Daya Labuhan Indah. After this process, there was no record of expansion by Wilmar.

Based on interviews with representatives of Sei Bilah Village and Sei Tampang Village, it is known that PT DLI and PT Perkebunan Milano are companies that were acquired by Wilmar from the previous company. From the interviews, information was also obtained

that the land acquisition process is always based on the agreement of both parties and there is no intimidation to forcibly relinquish land ownership rights.

Status: Comply

4.6

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

4.6.1; 4.6.2

The company has procedure of land acquisition or to identify customary right (*SOP Pembebasan Lahan, Doc number: SOP-IJIN LAHAN&OPS-006*). This procedure guiding respective staff of management to ensuring all land acquisition are comply with the national or local requirement and informed to the respective stakeholder especially if any indigenous people or customary right. According to land historical record, known that concession area of Wonosari and Sei Deras Estate (PT Daya Labuhan Indah) was owned by Asam Jawa Group and Cabang Dua Estate (owned by PT Perkebunan Milano) before took over by Karya Praja Nelayan Group (KPN Group). During year 2001, PT Perkebunan Milano was taken over by Wilmar International Ltd. On 2005, Wilmar also took over PT Daya Labuhan Indah. After this process, there was no record of expansion by Wilmar.

Based on interviews with representatives of Sei Bilah Village and Sei Tampang Village, it is known that PT DLI and PT Perkebunan Milano are companies that were acquired by Wilmar from the previous company. From the interviews, information was also obtained that the land acquisition process is always based on the agreement of both parties and there is no intimidation to forcibly relinquish land ownership rights.

4.6.3

Based on interviews with representatives of Sei Bilah Village and Sei Tampang Village, it is known that PT DLI and PT Perkebunan Milano are companies that were acquired by Wilmar from the previous company. From the interviews, information was also obtained that the land acquisition process is always based on the agreement of both parties and there is no intimidation to forcibly relinquish land ownership rights. In addition, it was also informed that land acquisition was never based on gender. Everyone, both men and women, has the same opportunity to own land.

4.6.4

The results of the verification of legality documents and interviews with relevant stakeholders, it is known that there are no new development areas or no new planting in the scope of certification until the surveillance-1.3 assessment. According to land historical record, known that concession area of Wonosari and Sei Deras Estate (PT Daya Labuhan Indah) was owned by Asam Jawa Group and Cabang Dua Estate (owned by PT Perkebunan Milano) before took over by Karya Praja Nelayan Group (KPN Group). During year 2001, PT Perkebunan Milano was took over by Wilmar International Ltd. On 2005, Wilmar also took over PT Daya Labuhan Indah. After this process, there was no record of expansion by Wilmar.

The company has documented all of land compensation process. The documentation consist of Map, Negotiation result (minutes of meeting), Land Release Letter, Payment Receive was filed in estate office based on land location.

Based on interviews with representatives of Sei Bilah Village and Sei Tampang Village, it is known that PT DLI and PT Perkebunan Milano are companies that were acquired by Wilmar from the previous company. From the interviews, information was also obtained that the land acquisition process is always based on the agreement of both parties and there is no intimidation to forcibly relinquish land ownership rights. Based on the results of interviews with relevant stakeholders such as government agencies and surrounding villages, information was obtained that the entire operational area of certification unit has been compensated by 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; 4.7.2

Company has procedure of land acquisition or to identify customary right (*SOP Pembebasan Lahan, Doc number: SOP-IJIN*

LAHAN&OPS-006). This procedure guiding respective staff of management to ensuring all land acquisition are comply with the national or local requirement and informed to the respective stakeholder especially if any indigenous people or customary right.

According to land historical record, known that concession area of Wonosari and Sei Deras Estate (PT Daya Labuhan Indah) was owned by Asam Jawa Group and Cabang Dua Estate (owned by PT Perkebunan Milano) before took over by Karya Praja Nelayan Group (KPN Group). During year 2001, PT Perkebunan Milano was took over by Wilmar International Ltd. On 2005, Wilmar also took over PT Daya Labuhan Indah. Based on document verification and interview with related stakeholder (village representatives) known that there was no new expansion after this concession took over by Wilmar International Ltd.

4.7.3

The results of the verification of legality documents and interviews with relevant stakeholders, it is known that there are no new development areas or no new planting in the scope of certification. Based on the results of interviews with representatives of surrounding village known that the land acquisition process is always based on the agreement of both parties and there is no intimidation to forcibly relinquish land ownership rights.

From the results of the interview, information was also obtained that one of the benefits of the existence of plantations is provides access to employment, CSR assistance, participate in local business development etc.

Status: Comply

4.8

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

4.8.1; 4.8.2; 4.8.3; 4.8.4

Based on the verification of incoming letter documents, interviews with management, the National Land Agency and representatives of surrounding villages (Kampung Bilah Village, Sei Tampang Village and Sei Nahodaris Village), it was found that there were no land disputes or conflicts with the community. In addition, the results of field observations to the company's operational areas also showed no indications of conflicts or disputes with the community.

Based on the area statement data, it is known that there is an area of 101.04 ha which is declared as an occupied area. The occupation has occurred since the beginning of land clearing and before the Wilmar Group took over. The actual condition of the land is Palm Oil planted by occupant.

The company has shown evidence of recorded agreements with the community regarding the occupied areas. Recorded evidence consists of:

- Agreement between PT DLI and the community on February 28, 2014 for the completion of an area of 101.04 Ha in Sei Deras Estate. The essence of the agreement is to maintain conducive conditions in the operations of both parties. There is also attendance list of meeting participants & photos.
- Agreement between PT DLI and the community on March 11, 2014 for the completion of an area of 101.04 Ha in Sei Deras Estate. The essence of the agreement is that both parties will continue to carry out their activities as before. This activity was attended by farmers, village heads, TNI and company representatives. There is also attendance list of meeting participants & photos.

Based on the results of interviews with representatives of surrounding villages, it is known that until surveillance-1.4 assessment, there is no conflict related to the occupied land. Occupied land is treated the same as the agreement. The occupied area has also been reported to the National Land Agency through HGU utilization reports which are routinely reported every year.

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; 5.1.2; 5.1.3; 5.1.4; 5.1.5; 5.1.6 The certification unit does not purchase FFB from independent or small holder schemes. The company only receives FFB from its own estate and other plantations within the Wilmar group.		
5.1.7 The results of document verifications it was known that the certification unit has routinely calibrated the weighing equipment carried out by UPTD Metrologi Legal <i>Rantau Prapat, Labuhanbatu Regency</i> . The certification unit has also shown documents on the weighbridge calibration for certificate of test results No. 510/194/DagInd-Met/KHP/10/2022, Brand: Avery Tronix, E-1205 which was carried out on 11 October 2022, valid until 11 October 2023. 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; 5.1.9 Based on the results of interviews with representatives of the surrounding community, it is known that until now there are no farmers around the company who wish to participate in RSPO certification activities.		
	Status: Comply	
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.		
5.2.1; 5.2.2; 5.2.3; 5.2.4; 5.2.5 There are no plasma nor independent smallholders and out growers who supply FFB to DLI 2 POM. Based on the results of interviews with local community representatives, it is known that until the surveillance 1.4 held, there are no farmers around the company who wish to participate in RSPO certification activities.		
	Status: Comply	
PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS		
6.1 Any form of discrimination is prohibited.		
6.1.1 The company has a policy stating that Plantation Business Actors prohibit all forms of forced labor or slavery in carrying out activities stated in Wilmar's Zero Deforestation, Zero Peat and Zero Exploitation policies. The policy explains that Wilmar, its suppliers and sub-contractors do not knowingly use or promote the use of forced or bonded labor in human trafficking and must take appropriate steps to prevent such labor. Companies should take remedial action if such workers are discovered to ensure that victims are referred to existing services for assistance and protection. And there are several approaches taken, such as: <ol style="list-style-type: none"> 1. Standardized work contract 2. Passport return 3. Voluntary overtime work 4. Ethical hiring 5. Decent living conditions 6. Freedom of movement 7. No unlawful deductions 8. Access recovery without pressure 9. Post-arrival orientation 10. Wilmar Statement regarding Transparency on Modern Slavery (UK Modern Slavery Act) This policy has been socialized to workers according to the minutes of the Socialization of Human Rights, OHS, Child Protection, Child Labor, Freedom of Association, Company Code of Ethics, Sexual Harassment Policy and Environmental Policy on 06 Jul 2023		

which was attended by 14 participants and all field workers (Harvest and maintenance).

6.1.2

The company does not discriminate or levy recruitment fees to workers at the PT Daya Labuhan Indah company, this is evidenced from interviews with representatives of workers at the Estate workshop and interviews with the village head Sei Tampak that the company does not discriminate or collect recruitment fees.

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

Based on interviews with manpower agency, gender committee, labor unions, and workers at sample unit, it is known that workers have never felt that the company has discriminated against them. It was explained that all activities from recruitment, performance appraisal, and promotion were given equal opportunity regardless of ethnicity, caste, nationality, religion, disability, gender, sexual orientation, gender identity, membership in labor unions, politics, or age.

6.1.3

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

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

Recruitment

Recruitment document in accordance with the recruitment requirements such as employment request form, application letter, statement of police report, identity card (KTP), family identity card (KK), result of written test, result of interview test, and work agreement letter. For example, a worker on behalf of JW (initial) who started working on 01 March 2023 (Letter Number 001/HRR-DLI/SK/III/2023).

Termination due to retirement

Termination document such as the management decree of employment's termination on behalf of USN (initial). The company also showed other supporting documents such as the management decree of employment's termination, debt certificate, calculation of termination payments, and proof of its payment in accordance with the applicable laws.

Promotion

Promotion documents such as management decree for worker's promotion. For example, a worker on behalf of FRD (initial) who had a promotion based on worker's appraisal based on 3 criteria, namely: ability to work, how to work, and self-management. FRD promote from group 2C to 2D (Harvest foreman) according to HRR Manager Decree number 003/DLI-HRR/SK/II/2023 dated 23 January 2023

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

6.1.4

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

6.1.5

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

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

6.1.6

Equal payment of wages has been made by certification unit properly, taking into account the ability, performance, expertise, length of work and other factors as a basis for remuneration. So that the payment of wages provided is in accordance with the burden / duties / types of work respectively. Then the company showed Internal Memorandum No. 005/HRR-Reg Sumut/IM/XII/2022 dated 28 December 2022 concerning Minimum Wages and Wage Scales for 2023 PT DLI and PT Milano with categories 2A, 2B, 2C and 2D. The minimum wage has not yet changed, namely IDR. 3,284,500, -/month or Rp. 131,380, -/day, the lowest wage is group 2A with a working period of less than 1 year, which is the same as the minimum wage and the highest wage is in group 2D with a maximum wage reaching IDR 6,038,200, the lowest working period allowance is 1-3 years of IDR 10,000 and the highest >19 years is IDR 100,000.

The results of verification of workers' payroll documents in the sample units show that wages are in accordance with the applicable minimum wage. In addition, the company also applies a wage scale based on length of service, achievement and performance.

The results of interviews and the verification of workers' wages e.g harvester with worker initial YAD and initial ADS (worker with same work and same grade in Cabang Dua Estate), it is known that the company has given the same wages for the same scope of work and in the same grade.

Status: Comply

6.2

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

6.2.1

The company already has a CLA with a validity period of 2021-2023. The CLA, among other things, has discussed the rights and obligations of employees such as company and labor union recognition, work relations, worker status, wages, dependents and positions, working days and working hours, overtime work, social security/welfare, employee cooperatives, permission to leave work on leave, disciplinary violations and others.

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

Regarding the minimum wage, the company refers to the Decree of the Governor of Sumatra Utara No.188.44/17/KPTS/2020 dated 13 January 2020 concerning the Labuhanbatu District Plantation Sectoral Minimum Wage for the 2020 period with a minimum of IDR 3,284,500/month or IDR 131,380/day. The unit of certification still uses this minimum wage determination because the 2023 Labuhanbatu Regency Minimum Wage is determined according to the Decree of the Governor of Sumatra Utara number 188.44/1004/KPTS/2022 dated 07 December 2022 amounting to Rp. 3,116,458 (lower than the 2020 Plantation Sectoral Minimum Wage)

Then the company showed Internal Memorandum No. 005/HRR-Reg Sumut/IM/XII/2022 dated 28 December 2022 concerning Minimum Wages and the 2023 Wage Scale for PT Daya Labuhan Indah and PT Milano with categories 2A, 2B, 2C and 2D. The minimum wage has not changed, namely Rp. 3,284,500, -/month or Rp. 131,380, -/day, the lowest wage is group 2A with a working period of less than 1 year which is the same as the minimum wage and the highest wage is in group 2D with the maximum wage Reaching Rp. 6,038,200, the lowest 1-3 years' service allowance is IDR 10,000 and the highest is > 19 years of IDR 100,000.

The results of verification of worker payroll documents in the sample unit show that wages are in accordance with the applicable minimum wage. In addition, the company also applies a wage scale based on length of service, achievement and performance.

Verification results for the sample wage slip for Wonosari harvest workers on behalf of PM for the June 2023 period with a total take home pay of IDR 5,460,985, on behalf of SM for the June 2023 period with a total take home pay of IDR 5,359,958.

Based on this explanation, it can be concluded that PT Daya Labuhan Indah and PT Milano have established regulations regarding minimum wages according to the provisions given by the government.

6.2.2

The company shows example of work agreement for worker of sample unit estate, for example Agreement number 001/HRR-DLI/SK/III/2023 dated March 1, 2023 on behalf of JW who was accepted as a maintenance employee with a probationary period of 3 months. Then Agreement 003/DLI-HRR/SK/V/2023 01 June 2023 was available regarding the determination of JW as permanent employees. In addition, the results of interviews with workers at the plantations and mills revealed that during the recruitment process the company did not burden workers with recruitment fees and did not retain documents.

Based on the interviews with worker union and their members who are workers in each unit, it is known that the union holds meetings every month (if there is an issue, if not they will be holds meeting when the issues arrive) with those accommodated in meetings between worker representatives and management representatives. companies can show the Minutes of Bipartite Worker Unions (SERBUNDO) with the Company on April 4, 2023 which were attended by 5 company representatives of PT Perkebunan Milano and representatives of Worker Unions with the subject matter of discussion regarding: Application for an Increase rice allowance (*Natura*) from IDR 9,200 to IDR 12,500 and Annual Bonus Increase. The conclusions of the Bipartite meeting are as follows:

- The Company absorbs aspirations from representatives of the Trade Union and will bring them to Top Management regarding the *Natura* request from IDR 9,200 to IDR 12,500
- Regarding the Annual Bonus, the Labor Union is aware of the situation and conditions and agrees to jointly encourage work productivity and participate in OHS campaigns so that it does not affect the annual bonus.
- Both parties understand that the decision to increase in-kind assistance and annual bonus is the full authority of management.

The company explained that this matter had been submitted to Top Management and was waiting for the Management Decision which would later be conveyed to workers through the Labor Union. The company has the opportunity to immediately provide a response from Top Management to workers through the Labor Union (OFI).

6.2.3

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

- Payroll documentation that gives information on compensation for work performance. The results of the simulation of wages and overtime in June 2023 for example with worker Security and operator boiler, known that the company has paid overtime wages according to the workers' overtime hours and has complied with the applicable regulations.
- Payslip document has informed deductions, working days, holiday, and others.

Based on document verification and interview with workers (harvesting workers, manuring workers, mill workers, etc.) known that there's no indication about the force labor. In addition, they get the wage accordance with the wage minimum regulation.

Interview with labor union and workers, said that wages paid, and overtime are in accordance with applicable regulations. Workers also has given leave in accordance with applicable regulation. Based on that interview also known that deduction for workers such as BPJS deduction, tax and etc has been described in the CLA.

6.2.4

Unit of Certification has provided housing facilities on each estate and mill. For example, list of facilities in 2023 including houses, mosque, church, workers hall, football field, volley ball field, badminton field and school bus. Based on field observation to housing complex of Mill and Estate, it was known that all housing on good condition and livable, there were domestic waste sanitation, and adequate clean water facilities.

Clean Water Wells and their Installation.

The results of interviews with CDE workers found that there were workers' complaints regarding the availability of clean water. Then the results of field observations in housing found that there were several gutters for rainwater collection and several rainwater storage tanks in damaged condition making it difficult to get clean water, some workers drilled wells independently.

In this regard, the company indicated a 2022 budget of IDR 200,000,000 for water drilling and pipe installation in CDE housing. In addition, the company can show documents:

- Budget plan of IDR 190,605,000 for the water drilling.
- Material PO documents on November 28, 2022
- Documents for receiving pipe material on January 31, 2023.

The company explained that currently the prospective Vendor/Contractor who will work on the drilling and installation will immediately carry out a survey with a team of experts. Furthermore, the signing of the Agreement will be carried out and the project for drilling and water pipe installation will be carried out immediately.

The company has the opportunity to immediately carry out drilling and installation of water pipes in employee housing (OFI).

6.2.5

The company has made it easier for workers and their families to obtain food sources by providing employee cooperatives that sell the daily needs of workers and provide access to vegetable traders to sell in the workers' housing area. In addition, there are also workers who open small business stalls to sell daily necessities in each housing. Based on interviews with workers (harvesters, sprayers, upkeep and mill operators), housing residents, worker union and woman working group, it is known that workers have no difficulty in getting food sources because the company has provided cooperatives that sell daily necessities and the existence of vegetable sellers given access to sell at home. In addition, workers can buy these needs into markets around the area of the certification unit with less difficult access.

6.2.6

The company has calculated the In kind Benefit for all workers set in 2023, including:

1. Lifetime House
2. Annual taxes, fees, levies and house insurance
3. Annual cost of maintenance
4. Annual electricity consumption cost
5. Annual water consumption cost
6. Bus Cost
7. Childcare cost
8. Cost Education
9. Cost Healthy
10. Cost Family Gathering

For example, the calculation for Sei Deras Estate In Kind benefit POM2 is 458,655 /month, minimum wage 3,284,500/month, holiday allowance 273,708/month so that the total Prevailing Wage earned for each month is Rp. 4,768,714. Based on the results of the document review, the living wages calculation has been carried out in an actual and rational way at the company's location.

6.2.7

Based on verification of workers' demographic documents for the period of June 2023, it can be obtained that all employees working in the company are permanent employees, as well as from interviews with company management that all employees working in the company are permanent workers.

Status: Comply

6.3

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

6.3.1

The company has a policy that recognizes freedom of association as stated in the document number SOP-HRD-008, explaining, among other things:

- HRD Manager along with plantation and mill leaders socialize company policy regarding the freedom for employees to join and form a worker's union and convey the benefits of workers union to employees.

- On the basis of the employee's desire to form a trade/labor union organization, if necessary, the HRD Manager along with the management of the plantations and mills assists in providing facilities and infrastructure in the formation of a trade union organization.
- The HRD Manager proposes the establishment of a bipartite institution consisting of company representatives and representatives from trade/labor union organizations, to the management and the manpower office. The company provides an office for the operational activities of the trade union organization to the management
- Based on the summary of the explanation, it can be concluded that the company supports and recognizes the freedom of trade unions.

6.3.2

The company has records of meetings between workers and management representatives. Based on the interviews with worker union and their members who are workers in each unit, it is known that the union holds meetings every month (if there is an issue, if not they will be holds meeting when the issues arrive) with those accommodated in meetings between worker representatives and management representatives. companies can show the Minutes of Bipartite Worker Unions (SERBUNDO) with the Company on April 4, 2023 which were attended by 5 company representatives of PT Perkebunan Milano and representatives of Worker Unions with the subject matter of discussion regarding: Application for an Increase rice allowance (*Natura*) from IDR 9,200 to IDR 12,500 and Annual Bonus Increase.

6.3.3

Based on interviews with labor union representatives who explained that the company had given freedom of association and at present labor unions have been formed. The establishment of the union is in accordance with the applicable laws and regulations and has been recorded at the Manpower Office. The company gives freedom for worker to express their opinion and also, certification unit did not give any intervention related to labor union activity.

There are 5 worker unions in the company, namely: SPSI, Serbundo, SP Metal, SBSI, SP Mandiri with the following legalities:

- The union named PUK.SP. PP-SPSI PT. Daya Labuhan Indah Sei Deras Estate with registration at the Manpower Office no 560/2335/DTK-4/2012 on July 30 2019 with 100 members.
- The union named the Indonesian Metal Workers Union Federation (PUK-FSPMI) PT Daya Labuhan Indah with registration at the Labor Office no 2707 / DTK -4 / 2019 on September 3 2019 with 64 members.
- A labor union named Serbundo PT Daya Labuhan Indah with registration at the Manpower Office no 560/1220/DSTKT-3/2015 on November 17 2015 with 217 members.
- A workers union named PT Daya Labuhan Indah Independent Workers Union with registration at the Manpower Office no 560/3173/DTK-4/2022 on December 22, 2022 with 30 members.
- SBSI 92 with registration at the Manpower Office no 01/PK.SBSI 1992/DLI/III/2023 dated 13 March 2023 47 members

Status: Comply

6.4

Children are not employed or exploited.

6.4.1, 6.4.2, 6.4.3 & 6.4.4

The company already has a policy prohibiting child labor as stated in the No Deforestation, No Peat, Zero Exploitation policy which was approved by Top Management on November 15 2019, which explains that the company and its suppliers/sub-contractors will not intentionally use or promote the use of child labour. Child labor and will take appropriate measures to prevent the use of child labor in all activities undertaken. The company will take corrective action in cases where child labor is found to ensure that appropriate follow-up is carried out and assistance will be provided to protect the welfare of the child. The company can show evidence of socialization of human rights, OHS, child protection, child labor, freedom of association, company code of ethics, sexual harassment policy and environmental policy on 06 Jul 2023 which is attended by 14 participants and all field workers (harvesting and maintenance) at Cabang Dua Estate.

Based on field visits and interviews with workers in the fields, it is known that the minimum age for work is 18 years, and no workers found below the minimum age specified. This is supported by the results of a review of company and contractor workers' document which proves that there are no workers under the age of 18 at the time of entering work.

Based on the results of the review of the agreement document with the contractor for examples is PT CV Chira Maju Berkah, it is known that in the agreement has a separate clause to ensure that the contractor does not employ minors (under 18 years old) and complies with the prevailing laws and regulations in Indonesia.

Based on this, it can be concluded that the unit of certification has a policy on child protection including the prohibition of child labor and has been well documented and known to all workers. The unit of certification demonstrates communication about its 'no child labor' policy and the negative effects of child labor and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.

Status: Comply

6.5

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

6.5.1

The company has a policy to prevent violence, both sexual and other forms of action, explaining, among other things, that the company provides a conducive work environment characterized by equality and mutual respect and if there are allegations of sexual harassment, violence and abuse, and violations of reproductive rights are proven, the company will act fairly in applying appropriate sanctions, until the perpetrator is removed from the company. To support this, Unit of Certification has formed a Gender Committee in each unit as a place to submit complaints and complaints regarding violations of reproductive rights/women and sexual harassment.

There is gender committee established to resolve if sexual harassment occurs. The policy on sexual harassment and reproductive rights of women are imposed on contractors by being included in their contractual agreements. Unit of Certification was developed protocol flowchart for sexual harassment reporting. Each of the units (mill and estates) has their own gender committee that supported with annual work programs. Estates annual Work Programs includes periodic meetings of the gender committee. health check, sports, collaboration with healthy agency, PPE education for female spray employees, health checks of children, toddlers and infants.

6.5.2

The company also regulation in CLA of menstrual leave for female worker which is given for two days after it is checked by medical worker in clinic. Based on document verification sighted that Unit of Certification has also shown example of socialization of this policy to worker which was held in Wonosari Estate.

Based on document verification, the company has given menstrual leave and maternity leave of female workers. For example, maternity leave was given 3 months of paid leave (1.5 months before give birth and 1.5 months after).

Based on the interviews with the gender committee and day care officer, company had given time for breastfeeding woman and provided certain place for breastfeeding. This is one evidence that the company supports the protection of reproductive rights, especially for women.

6.5.3

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

The company has specifically provided need for new mother or breastfeeding workers to breastfeed by setting a special time for breastfeeding at work, the availability of a special room for breastfeeding and other supporting facilities. The company shows the Identification of Mother's Needs before and after childbirth conducted by Midwives on April 14 2023 with 15 PT DLI employee respondents as follows:

- Post-pregnancy: prenatal checks, prenatal consultations, giving vitamins to pregnant women, ultrasound
- When giving birth to a child: preparing a change of clothes, octopus, sanitary pads, flip flops and socks, baby needs, coming to the clinic
- After birth: mental preparation, facilitating breastfeeding, care for the baby's umbilical cord, exclusive breastfeeding for 6 months, caring for birth injuries, infant immunization, baby care, providing breastfeeding time for women workers

<p>6.5.4</p> <p>The company has a complaint mechanism that respects identity protection as stated in the SOP for receiving complaints and resolving disputes with document number SOP-BNM-009 at point 6.2 explaining, among other things, that the company guarantees the confidentiality of the identity of the reporter and whistleblower by looking at the sensitivity of the issue, the scale of the impact if the issue is made public, or the risk of retaliation.</p> <p>Based on the results of interviews with representatives of working union and gender committee it is known that the workers have understood the procedures and mechanisms for submitting complaints/complaints to the company, this is because the company has routinely socialized the procedure by posting warnings/complaints. signposts related to this.</p> <p>Based on the explanation above, it can be concluded that the certification unit has a complaint mechanism that guarantees the anonymity and protection of the complainant which is known by all levels of workers and has been well documented.</p>	Status: Comply
<p>6.6</p> <p>No forms of forced or trafficked labour are used.</p>	
<p>6.6.1</p> <p>The company has shown that on each work agreement between company and contractor/supplier, there were clauses related to fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the contractors. Some of these obligations are related to anti-bribery, anti-corruption, and anti-forced labor. To ensure compliance with these clauses, the certification unit always requests the requirements for the completeness before contractor does work.</p> <p>Based on result of interview with manpower agency, gender committee, labor union, and workers at estates and mill, there is no issue of discrimination and forced labor in Unit of Certification. There were no significant obstacles related to employment or violations of the company regulations. The company provided output targets that can be obtained in 7 hours of work. If the harvester obtains more output within or more than 7 working hours, then the harvester will get the incentive payment. No penalty was given to the harvester if it does not get output due to natural factors such as rain. Based on the payment list, the harvesters have earned above the minimum wage.</p> <p>There was no pressure/forced in doing overtime work, workers who had overtime at Unit of Certification can refuse if ordered to do overtime activities because overtime is not the worker's obligation. Based on interviews with workers, labor union and gender committee, all work in the company was done voluntarily. There are no practices of retention of identity documents, payment of recruitment fee, contract substitution; lack of freedom to resign, debt bondage, and withholding of wages in the company.</p> <p>6.6.2</p> <p>The company already has a Recruitment SOP which was approved by the Reg Manager on November 5, 2018 which explains, among other things. There was no discrimination between workers. The company has also socialized about its policy and procedure related to prohibition of worker discrimination in company to workers.</p> <p>Based on document verification, there are no migrant workers in this company. In addition, based on interview with worker union board sighted that so far, there has never been a penalty for termination of employment, bonded labor practices, withholding wages, and forced overtime.</p>	
Status: Comply	
<p>6.7</p> <p>The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>	
<p>6.7.1</p> <p>The company shows the OHS organization for PT Daya Labuhan Indah in accordance with the Manpower Office Decree No. KEP.183-7/P2K3/WIL-IV/DTK/SU/2023 dated 26 June 2023 concerning Ratification of PT Daya Labuhan Indah's P2K3 with the Guiding Committee Of Occupational Safety & Health secretary. Andi Syahputra, Yudo Martita and Bambang Alamsyah. Guiding Committee Of Occupational Safety & Health secretary licenses include:</p>	

- Yudo Martita already has an OHS expert Intermediate competence certificate from BNSP No. 78000.3152.0004315.2021 is valid for 4 years.
- Andi Syahputra refers to the statement letter from person in charge of K3 No. 5/3415/AS.0204/IV/2021 dated April 22, 2021 which informed that licenses, decree and certificates were still in the process of being issued, this was also accompanied by BNSP Circular Letter number 1118/BNSP/VII/2021 dated July 26, 2021 regarding temporary suspension delivery of blank certificates.
- The company shows Employment Decree No. KEP.250.a-7/P2K3/WIL-IV/DTK/SU/2022 dated June 2, 2022 concerning Ratification of Guiding Committee of Occupational Safety & Health KCD with Guiding Committee Of Occupational Safety & Health Secretary named Ali Raseden Daulay, according to Appointment Decree No. 5/11442/AS.02.04/IX/2021 dated September 30, 2021, which is valid for 3 years.

The company shows regular Guiding Committee Of Occupational Safety & Health meeting records, for example the Guiding Committee Of Occupational Safety & Health DLI Minutes dated June 30, 2023 discussed among other things:

- Review outstanding audit cross Working Days / Inspection in May 2023
- HK Audit / Inspection and Working Days and internal inspection in June 2023
- Work accident report 2023
- Existing issues and training programs for March 2023.

Based on the explanation above, it can be concluded that the company already has an OHS organization with an adequate number of personnel in accordance with laws and regulations.

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 Fire and Residential Fire. The company also record of training of Internal Safety, Emergency Response, First Aid and CPR training, which was held on August 29 2022 at PT DLI Wonosari Estate, organized by the Labuhan Batu Regency Regional Disaster Management Agency for all Mill and Estate employees.

The results of the field visit revealed that the company had provided first aid kits in each building and equipped first aid bags for workers in the field which were brought by the foreman, the results of interviews with the foreman revealed that the officers could briefly explain how to handle first aid kits as well as the functions and uses of the contents of the first aid bag. In addition, in the Mill and Estate area there are evacuation route warnings and assembly points.

The company already has an emergency response organization for each unit, both plantations and factories. for example :

- The Organizational Structure of the Emergency response team PKS DLI-2 dated July 08, 2023 consists of a Chair, Secretary, Coordinator, Emergency Response Task Force, Communications Task Force, Rescue Task Force, Security Task Force, Paramedical Task Force, Inventory Task Force, and Repair and Recovery Task Force.
- The Organizational Structure of the Emergency response team PT DLI KSD dated July 08, 2023 consists of a Chair, Secretary, Coordinator, Emergency Response Task Force, Communications Task Force, Rescue Task Force, Security Task Force, Paramedical Task Force, Inventory Task Force, and Repair and Recovery Task Force.
- Organizational Structure of the Emergency response team PT DLI KWS dated July 08, 2023 consisting of Chairperson, Secretary, Coordinator, Emergency Management Task Force, Communication Task Force, Rescue Task Force, Security Task Force, Paramedical Task Force, Inventory Task Force, and Repair and Recovery Task Force

Based on the results of field observations at the Mill and Estate locations, emergency response equipment such as fire extinguishers, hydrants, first aid kits for buildings and first aid bags for field workers carried by the foreman were available. Apart from that, during field observations, hydrant simulations were also carried out at the mill location.

6.7.3

The company shows SOP No. SOP-GEN-025 dated February 1, 2015 which contains information related to: Identification and Procurement of PPE and Distribution of PPE.

Based on the results of field visits and interviews with workers (harvesters, pesticide applicators and factory operators) in the KWS, KSD, MILL, and KCD units, it is known that workers receive free PPE every year according to their respective types of work. Work

and if there is damaged PPE, it can be immediately reported to the direct supervisor for replacement. At the time of the audit, it was seen that all workers had used PPE according to standards, such as pesticide applicators using aprons, masks, face shields, gloves, boots, and others. In addition, the unit of certification also has proof of handing over PPE to all workers every year and replacing damaged PPE, for example:

- Proof of handover of PPE in the form of rubber gloves for KWS treatment with the initials NS on July 03, 2023.
- Evidence of PPE handover in the form of a helmet and ear plugs for PT DLI 2 boiler operator under the initials BH on July 10, 2023.

The unit of certification also has sanitation facilities for pesticide applicators in each unit which are used as a place for storage, cleaning and replacement when returning home from work. This is done to ensure workers arrive clean and leave clean without bringing hazardous chemicals to their home locations. Based on the results of field observations at the pesticide sanitation facilities at KWS, KSD, and KCD, it was found that the facilities were clean and well organized, there were rooms used for bathing and cleaning PPE separately.

6.7.4

The company has shown proof of paying for Labour Social Assurance and Workers Social Security Agency for Mass Health:

- Proof of POM May 2022 Employment BPJS membership which was paid on June 15, 2023 for 69 people
- Proof of membership for Workers Social Security Agency POM June 2022 paid on June 8, 2023 for 69 people
- Proof of membership in the May 2022 Labour Social Assurance Wonosari Estate and Sei Deras Estate paid on June 14 2023 for 802 people
- Proof of membership for June 2022 Workers Social Security Agency Wonosari Estate paid on June 8, 2023 for 400 people
- Proof of June 2022 Sei Deras Health BPJS membership which was paid on June 8, 2023 for 402 people

Based on the explanation above, it can be concluded that the company already has a list of employees who take part in the Employment and Health Social Security Administration Agency Workers Social Security Agency program along with proof of payment every month.

Based on the document review, it is known that there were cases of work accidents which resulted in lost work days as described in indicator 6.7.5. In additions, based on the interview with company representatives and workers representatives who experienced work accidents, known that those who had work accidents had received medical treatment at the clinic called Fasker I. Regarding medical treatment costs, nothing was charged to the victim but these costs were claimed to *BPJS Ketenagakerjaan*. All accident cases only result in medical treatment policy claims to *BPJS Ketenagakerjaan* and there are no accidents which result in claims for compensation according to law.

6.7.5

The company shows a record of work accidents using LTA, for example the period January – March 2022 as follows:

Description	KWS	KSD	Mill	KCD
LTA	11,4	18,08	0	0
SR	20,2	37,96	0	0
FR	12,3	21,69	0	0

Companies can also show records of investigations into work accidents that occur, for example as follows:

- General Incident Investigation Report dated September 29, 2022 regarding Kernel Operator work accidents which provides chronology and analysis of the causes of accidents and corrective and preventive actions.
- A Work Accident Investigation Report and Suggestions for Correction dated April 6, 2022 related to harvester work accidents at KCD which provide chronological information and analysis of the causes of accidents and corrective and preventive actions.

Status: Comply

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

7.1

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

7.1.1

The company shows procedures related to Plant pest organisms observation and control which are contained in the document including:

- SOP for Detection and Census of Pests and Diseases No. SOP-EST-13 dated February 1 2015, the SOP explains the procedures for conducting a census, types of pests and determining the level of attack.
- SOP No. SOP-EST-018 (Rev. 03) dated 01 September 2016. The procedure explains that chemical control is carried out if the census results show the level of attack is above the economic threshold set by the company. In normal non-attack situations, a warning or early detection system is implemented by staff in the field. To reduce the use of chemicals (pesticides), the procedure also regulates biological pest control systems. The types of pests and diseases found in the procedure include palm leaf-eating caterpillars (UPDKS), termites, stem rot disease, pupal rot disease, horn beetles (*Oryctes rhinoceros*), rats and ganoderma. The procedure has explained that pest control is carried out in an integrated manner, and has implemented an early warning system with detection and census of pests and diseases.

The plantation manager has an integrated pest control program and its realization includes:

- The results of the Division 1 Fireworm Census block 124 KWS on January 9, 2023 found signs of a caterpillar attack with a weight criterion of 16%.
- Oil palm leaf eating caterpillar division 2 Census results showed no attacks.
- The Census of Box Owls, for example KWS Estate Division 2 in June 2023, contained 9 empty Owl Boxes.

Based on field observations at the Wonosari Estate and Sei Deras Estate, it is known that the actual conditions are in accordance with the documents.

7.1.2

Based on the results of the document review and field observations, it is known that the company uses beneficial plants (*Turnera Subulata*) and owls (*Tyto Alba*), both of which are not invasive species based on Minister of Environment and Forestry Regulation no. 94 year 2016.

7.1.3

There is no use of fire for pest management purposes. Estate management prefer to control pest population by biological method instead of chemicals. This matter verified through field observation which shows that there were no indication of fire activities in estate operational areas.

Status: Comply

7.2

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

7.2.1

The company shows procedures related to Plant pest organisms observation and control which are contained in the document including:

- SOP for Detection and Census of Pests and Diseases No. SOP-EST-13 dated February 1 2015, the SOP explains the procedures for conducting a census, types of pests and determining the level of attack.
- SOP No. SOP-EST-018 (Rev. 03) dated 01 September 2016. The procedure explains that chemical control is carried out if the census results show the level of attack is above the economic threshold set by the company. In normal non-attack situations, a warning or early detection system is implemented by staff in the field. To reduce the use of chemicals (pesticides), the procedure also regulates biological pest control systems. The types of pests and diseases found in the procedure include palm leaf-eating caterpillars (UPDKS), termites, stem rot disease, pupal rot disease, horn beetles (*Oryctes rhinoceros*), rats and ganoderma. The procedure has explained that pest control is carried out in an integrated manner, and has implemented an early warning system with detection and census of pests and diseases

The company has used pesticides that have been registered with the Pesticide Commission of the Ministry of Agriculture. Based on a review of documents and observations in the agrochemical warehouse, the pesticides used at PT DLI include:

Pesticides	Active ingredient	Permit no	Target
Meta Prima	Metil Metsulfuron	RI. 01030120031897	Narrow-leaved, broad-leaved, riddle-leaved weed
Supremo	Isopropilamina glifosat	RI. 01030120021712	Weed Control
Basta	Amonium Glufosinat	RI. 01030120175826	Narrow-leaved, riddle-leaved weed
Garlon	Triclopyr butoxyethyl ester	RI. 0103011984695	After-emergence systemic herbicides are in the form of a concentrate that can be emulsified
Cyperin	Cypermethrin	RI. 01010120052255	Leaf destroying pests

All of the pesticides mentioned above are selective types of pesticides to deal with weeds or pests that are targeted. In addition, all of them are not included in the World Health Organization (WHO) Class 1A or 1B list or included in the Stockholm or Rotterdam Conventions, and paraquat

7.2.2

The company shows records of pesticide use, for example the use of supremo brand pesticide at KWS Estate for the period January-December 2022 as follows:

- Active Ingredients: Glifosat 20%
- LD50: >5,000 mg/kg
- Application Area 1.189,10 Ha

7.2.3

As part of the pesticide reduction plan and the implementation of Integrated Pest Management, the company has used biological pest control with natural enemies of pests (*tyto alba*) and beneficial plants (*turnera subulata*).

The plantation manager has an integrated pest control program and its realization includes:

- The results of the Division 1 Nettle Caterpillars Census block 124 KWS on January 9, 2023 found signs of a caterpillar attack with a weight criterion of 16%.
- UPDK division 2 Census results showed no attacks.

Based on the explanation above, it can be concluded that the company does not use pesticides preventively to prevent pests and diseases.

7.2.4

The company has a program to reduce pesticide use by replacing pesticides with biological controls such as using natural predators to control rats and Beneficial Plant. Based on the document review, several IPM programs with biological approaches have been implemented, such as controlling rats by *Tyto alba*, and leaf-eating caterpillars by planting beneficial plants such as *Turnera subulata*. In addition, the company has also carried out early detection which is routinely listed in the monthly report of the early warning system. No prophylactic use. The application of prevention is unknown, but it is done selectively. There is no use of pesticides used for prevention purposes, all applications are carried out carefully and through planning such as through the division work program, besides that as evidence of planning there is a pesticide application program.

The plantation manager has an integrated pest control program and its realization includes:

- The results of the Division 1 Nettle Caterpillars Census block 124 KWS on January 9, 2023 found signs of a caterpillar attack with a weight criterion of 16%.
- UPDK division 2 Census results showed no attacks.

Based on the explanation above, it can be concluded that the company does not use pesticides preventively to prevent pests and

diseases.

7.2.5

Based on the results of field observations in the pesticide storage warehouse and the pesticide use list, there was no use of pesticides that were included in the World Health Organization (WHO) Class 1A or 1B list or included in the Stockholm or Rotterdam Conventions, as well as paraquat.

7.2.6

In order to maintain the competence of workers handling pesticides, the company conducts regular training which is indicated by documentation, for example:

- Dissemination of aspects of the impact on maintenance workers (manuring and spraying) explaining the risks to the nature of KWS workers. The training was held on January 7, 2023.
- Dissemination of aspects of the impact on workers (manuring and spraying) regarding risks to the nature of workers. The KSD Training was held on January 7, 2023.
- Dissemination of impact aspects on explaining workers (manuring and spraying) regarding the risks to the nature of CDS workers carried out on September 8, 2022.

Based on the results of interviews with spray workers, it is known that PPE was provided free of charge by the company in the form of gloves, aprons, glasses, masks, safety shoes, helmets. Workers also store and wash work tools in the washing area (Rinse House) provided by the company (work tools are not taken home). Workers also understand the technicalities of worker activities by explaining work techniques starting from spraying methods, weed targets, and avoiding spraying in river border areas. (As for the onsite audit, there were no spraying activities). From the results of field observations during the spraying activities, it was discovered that workers already understood the use of PPE, work techniques and handling the dangers of chemicals.

7.2.7

The results of field observations of the chemical storage warehouse at KCD Estate & KWS Estate revealed that the chemical storage warehouse complies with Government Regulation number 74 of 2001 concerning Management of Hazardous and Toxic Materials.

7.2.8

The unit of certification already has SOPs or work instructions related to the management of used pesticide containers, presented in document No. SOP-EST-020 (Rev. 02) dated 01 February 2015 while procedure on hazardous materials handling is presented in document No. SOP-GEN-005 (Rev. 3) dated 01 October 2015. Procedure mentioned that used pesticide containers shall be delivered and placed on the permitted Hazardous Waste Store, and prohibit to be use for household purposes, unless reuse for related pesticide application activities.

Based on document review, the company can show the number of used pesticide packages that leave the central warehouse and enter (after field application) to the hazardous and toxic waste warehouse. Pesticide packaging that is recorded based on each type of pesticide from each plantation. The unit of certification does not reuse the packaging for other purposes.

Based on the results of field visits to the residential areas of the Cabang Dua and Sei Deras Estate, it was found that there were no traces of pesticide packaging that were reused, for example as water reservoirs or flower pots.

7.2.9

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

7.2.10

The company shows the health examination records of Spray workers for example:

- PT Daya Labuhan Indah Sei Deras cholinesterase examination results in 2022 from Sri Pamela Torgamba Hospital on June 16 2023 on 43 workers.
- Results of the 2023 PT Daya Labuhan Indah Wonosari Cholinesterase examination from Sri Pamela Torgamba Hospital on June 15 2023 on 31 workers.

- Recapitulation of PT DLI PKS MCU Results from the Prodia Clinical Laboratory on 22 -10- 2022, carried out on 96 workers with GOT, GPT and Audiometry examinations. The conclusion of the inspection results stated that all workers were declared fit to work.
- Results of cholinesterase examination of PT Daya Labuhan Branch Dua Estate 2023 from Sri Pamela Torgamba Hospital on June 14 2023 on 15 workers.

The company also shows the follow-up actions taken against workers affected by the disruption, for example:

- The spray worker with the initials KS KWS Estate initially underwent an examination with a diagnosis of cardiomegaly. It is recommended not to spray until waiting for his health condition to return, use PPE, and carry out re-examinations every 6 months.
- The spray worker with the initials YL KSD Estate initially underwent an examination with a diagnosis of cardiomegaly. It is recommended not to spray until waiting for his health condition to return, use PPE, re-examine every 6 months.

7.2.11

Based on field observations and interviews with pesticide operators at KWS, KSD and KCD, it is known that there are no workers under 18 years old who work in Setra's chemical activities. Pregnant and breastfeeding women are prohibited from working in the chemical sector. Monitoring is done through monthly pregnancy tests. If a pregnant woman is found, she will be moved to light, non-chemical activities.

Status: Comply

7.3

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

7.3.1

The Unit of Certification already has procedure related to waste management, stated in SOP-EHS-10 Handling Hazardous and Domestic Waste, dated 1 January 2020. This procedure explains responsibilities, description of procedures, storage technical requirements, treatment for expired waste, packaging and storage requirements, storage for hazardous waste and classification, technical requirements for storage of reactive, corrosive and toxic waste, permits, waste management, waste submission, domestic waste handling, reporting and supporting documents.

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

Hazardous and Toxic waste

Unit certification has a temporary storage permit for hazardous and toxic waste for each unit, there are;

- Hazardous Waste Storage Permit (Wonosari Estate) based on Decree of the Head of *DPMPSTP* Number 503.660.3/214/DPMPSTP-BP2MNP/2019 on April 1, 2019 which is valid for 5 years.
- Hazardous Waste Storage Permit (DLI POM-02) based on Decree of the Head of *DPMPSTP* Number 503.660.3/409/DPMPSTP-BP2MNP/2021 May 2021 which is valid for 5 years.
- Hazardous Waste Storage Permit (Cabang Dua Estate) based on Decree of the Head of the Labuhan Batu Regency *DPMPSTP* No. 503.660.3/140/DPMPSTP-BP2MNP/2019 dated 26 February 2019 valid for up to 5 years.

Based on this permit, it is known that the types of hazardous and toxic waste that are allowed to be stored are used oil, used filters, used batteries, pesticide packaging, spill kit waste, used cartridges, LED lamps, and clinical waste.

Based on observations of the Cabang Dua and Sei Deras Estates temporary hazardous waste storage, it is known that the building has been equipped with an emergency response such as fire extinguisher, first aid kit, eye wash, shower, hazardous waste symbol and label, also waste placement according to the type and characteristics. In addition, there is also a logbook to record. Hazardous waste also handled properly by disposed based on each toxicity and hazardous characteristics, such as medical waste which is classified as infectious.

In the management, transportation and handling of waste unit of certification collaborated with licensed parties, which is carried out regularly every 6 months named PT Veronica Tannaga, and in the management, utilization and/processing of waste in collaboration with PT Prasadha Pamunah Waste Industry and PT Universal Eco Pacific. With the cooperation agreement documents that are still

valid (tripartite), among others;

- SPK DLI, PT Veronica Tannaga, and PT Universal Eco Pacific Number 001/DWS-VTA-UEP-SPKLB3/III/2022 dated 24 March 2023.
- SPK DLI, PT Veronica Tannaga, and PT Prasadha Pamunah Waste Industry Number 002/DLI2-PPLI-VTA/SPK/III/2023 dated 01 March 2023

Each unit has recorded well so that waste can be easily traced, both in the log book, balance sheet, and manifest.

Solid Waste

The solid waste produced by the company is shell, fiber and empty fruit bunch. The management plan is carried out by reusing solid waste such as shells and fiber to be reused as boiler fuel. Meanwhile, solid waste such as EFB is reused by applying it to plantation areas. Solid waste utilization data is explained in more detail in indicator 7.9.1.

Based on the results of a field visit to the Empty Bunch Area, it is known that the empty bunches stored are in a piled-up condition, due to the non-operation of the stoves in the mill. In the ASA 1.3 activity, it is planned to build an incinerator with a capacity of 30 tons.

However, the plan was changed to build a boiler with a capacity of 25 tons. Until the ASA 1.4 assessment is carried out, the company can show development progress including;

- Proof of e-mail regarding offers and budgeting for boiler units as of 13 July 2023.
- E-mail proof of *PERTEK* air emission arrangements (for boilers) as of July 13, 2023, currently in the drafting process by consultants.

Based on this description, the company has the opportunity to ensure that the permit is fulfilled in accordance with applicable legal obligations. **OPI**

Liquid Waste (POME)

Liquid waste generated from the factory is reused for Land Applications (LA). Before being channeled to LA, the liquid waste is first managed at the WWTP with the aim that the quality of the liquid waste flowing to LA is in accordance with the provisions. The results from POME processing are also used for methane gas in the biogas plant which is fully used for the CPO production process.

Domestic Waste

Domestic waste generated from housing and offices will be disposed of in Landfills for organic and an-organic waste. Based on the results of field visits to the housing area (Sei Deras Estate, Wonosari Estate, and Cabang Dua Estate), there are no traces of burning waste.

7.3.2

Unit of Certification has implemented hazardous waste management in accordance with its procedures and government regulations Number 22 of 2021 and has carried out document reporting every quarter, including by;

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

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

- Document on Results of Identification of Waste Sources, which provides information regarding sources of hazardous and domestic waste that have been identified by the company from plantations.
- Balance Sheet and Logbook for storing waste at hazardous waste. The recording is carried out to determine the incoming and outgoing waste and to determine the shelf life of waste at storage.
- Conduct socialization to employees which can be proven through minutes of socialization in the form of attendance and photos
- OHS Completeness Monitoring Document for the 2023 period which informs the condition and completeness of emergency

response facilities areas such as first aid kits, eye wash and shower checks, fire extinguishers, spill kits and alarms.

- Routine reporting of quarterly to District and/or Provincial Environmental Agency to related offices.

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

7.3.3

Unit certification does not use open burning for waste disposal. It can be proven through document review and management interviews, that the company has a Willmar Environmental policy to apply the Zero burning principle of plantation development and waste disposal, except in special conditions as stated in the ASEAN Guidelines for its activities.

It is also proven through the waste transportation manifest and the results of observations in housing area Sei Deras, Wonosari, and Cabang Dua Estate that there were no traces of burning activities. Interviews with employees who live in the housing estate also stated that they had never burned waste due company commitment and domestic waste in the housing is transported twice a week and properly managed in landfills, so that no accumulated waste is burned.

Status: Comply

7.4

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

7.4.1

Procedure related to soil fertility is presented in several documents, as follows:

- Procedure No. SOP-EST-002 (Rev. 00) dated 01 June 2007 about planting of legume cover crop (LCC). The procedure mentioned that the LCC is conducted for more N-fixation on the soil.
- Procedure No. SOP-EST-004 (Rev. 01) dated 08 February 2012 about manual manuring. the procedure covers type of fertilizer, time of application, fertilizer placement, fertilizer management, frequency pf application, etc.
- Procedure No. SOP-EST-004A (Rev. 0) dated 24 August 2016 about leaf sampling unit (LSU). The procedure mentioned that LSU shall be conducted annually for annual manuring program calculation reference.
- Procedure No. SOP-EST-004B (Rev. 00) dated 24 August 2016 about soil sampling unit (SSU). The prcedure mentioned that SSU shall be conducted every five years. The data also to be used for annual fertilizer calculation program.

The company shows the following Leaf Analysis and Soil Analysis records:

- (Leaf Analysis) Test Result Report No. 29/PLANTS MATERIALS/III/2023/DLI April 14 – May 22 2023 for 109 samples (KWS and KSD), The parameters analyzed included: N, P, K, Mg, Ca, B, Cu, Zn, Fe and M N.
- (Soil Analysis) Test Result Report No. 4/TANAH/II/2020/ DLI April 6 – May 13 2020 for 42 samples. The parameters analyzed included: pH, C-Organic, N, P, K, Mg, Ca, Na, CEC, BS, Mn.

the results of field observations found that the application of programs to maintain soil fertility included the application of pruned palm fronds as an alternative nutrient source and fertilization according to recommendations.

7.4.2

The company demonstrates procedures related to leaf and soil analysis, including:

- Procedure No. SOP-EST-004A (Rev. 0) dated 24 August 2016 about leaf sampling unit (LSU). The procedure mentioned that LSU shall be conducted annually for annual manuring program calculation reference.
- Procedure No. SOP-EST-004B (Rev. 00) dated 24 August 2016 about soil sampling unit (SSU). The prcedure mentioned that SSU shall be conducted every five years. The data also to be used for annual fertilizer calculation program.

The company shows the following Leaf Analysis and Soil Analysis records:

- (Leaf Analysis) Test Result Report No. 29/PLANTS MATERIALS/III/2023/DLI April 14 – May 22 2023 for 109 samples (KWS and KSD), The parameters analyzed included: N, P, K, Mg, Ca, B, Cu, Zn, Fe and M N.
- (Soil Analysis) Test Result Report No. 4/TANAH/II/2020/ DLI April 6 – May 13 2020 for 42 samples. The parameters analyzed included: pH, C-Organic, N, P, K, Mg, Ca, Na, CEC, BS, Mn.

7.4.3

Based on the results of field observations, it is known that the company has implemented a nutrient recycling strategy, including utilizing midribs by pruning.

7.4.4

Based on the study of program documents and the realization of fertilization, it is known that the recommended fertilizers include: Buch Ash, Kaptan, MOP, RP, Urea, and Borate.

The company shows documentation of KWS Estate fertilization plans and realization for the 2023 period, for example:

Fertilizer Types	Projection (Kg)	Realization Kg	Achievement
Urea	452,756	411,381	91%
Bunch Ash	1,783.068	1,683,762	94%
MOP	298,244	290,980	98%
RP	86,921	86,923	100%
Borate	38,408	35,100	92%

Based on the data above, it can be concluded that the realization of fertilization is in line with the established program, but the realization is not yet 100% because the financial year is still ongoing.

Status: Comply

7.5

Practices minimize and control erosion and degradation of soils.

7.5.1

The Certification Unit has carried out semi-detailed land survey work carried out by Param Agricultural Soil Survey, Sdn. Bhd. in November 2008. Land survey for PT DLI covering an area of 6,010.00 ha and PT Milano covering an area of 670.70 ha. Soil Maps are available in appropriate scales, namely 1:25,000 and 1:50,000. A summary of the results of the soil survey regarding soil suitability is described as follows:

Soil Survey:

- Soils in PT DLI (KWS and KSD) were fully covered by peat soil with several depth, divided into four categories, e.g.: shallow (50-100 m), moderate (100-150 cm), deep (150-300 cm) and very deep (>300 cm). All peat was categorized as marginal with saprist decomposition level. However, there are no sulfidic marine clay deposits. Very deep peat soils which considered as fragile soil has occupy for about 40 % from PT DLI total area, while the rest were considered as marginal. Main limitation for oil palm cultivation on PT DLI were mainly due to very poorly drained property.
- Soils in PT Milano (KCD) were dominated by peat soils for about 80 % with various depth from shallow to deep. The rest were mineral soils over recent riverine alluvium. Even though there is no fragile soil in KCD, however, it has the same main limitation with estates of PT DLI, which is has a very poorly drained soil property.

Topography

Based on semi detail soil survey analysis, it was known that slope condition in PT DLI and KCD of PT Milano are dominantly flat to undulating, ranged between 0° to 6°. Thus, there is no soil management limitation due to hilly to steep area. Limitation were mostly due to very poorly drained soil property and prone flooded area. To overcome this matters estate management has conducting field drains system. This situation has observed on the field.

7.5.2, 7.5.3

Based on the results of interviews with company management and the results of document review, it is known that the company does not have a replanting plan for the next 5 years. It is known that the planting year of the company is between 2009 – 2015.

Status: Comply

7.6

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

7.6.1

Unit of Certification has conducting semi detail soil survey works that conducted by Param Agricultural Soil Survey, Sdn. Bhd. in November 2008. Soil survey for PT DLI and PT Milano, on the area covers about 6,010.00 ha and 670.70 ha, respectively. Soil Map is available in proper scale, i.e. 1:25,000 and 1:50,000. Summary of soil survey results towards soil suitability describes as follows:

- Soils in PT DLI (KWS and KSD) were fully covered by peat soil with several depth, divided into four categories, e.g.: shallow (50-100 m), moderate (100-150 cm), deep (150-300 cm) and very deep (>300 cm). All peat was categorized as marginal with saprist decomposition level. However, there are no sulfidic marine clay deposits. Very deep peat soils which considered as fragile soil has occupy for about 40 % from PT DLI total area, while the rest were considered as marginal. Main limitation for oil palm cultivation on PT DLI were mainly due to very poorly drained property.
- Soils in PT Milano (CDE) were dominated by peat soils for about 80 % with various depth from shallow to deep. The rest were mineral soils over recent riverine alluvium. Even though there is no fragile soil in CDE, however, it has the same main limitation with estates of PT DLI, which is has a very poorly drained soil property.

7.6.2, 7.6.3

Based on the results of interviews with company management and the results of document review, it is known that the company does not have a replanting plan for the next 5 years. It is known that the planting year of the company is between 2009 – 2015.

Status: Comply

7.7

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

7.7.1

Based on the results of interviews and a review of the area statement documents, it was found that the company did not carry out new plantings after November 15, 2018.

7.7.2

The company showed a report on the inventory of peat areas to the RSPO on December 21, 2022 which explained the area of peat land in the company's operational area, in which the report obtained information that the area of planted peatland was 345.21 Ha.

Peat Area Distribution

Unit of Certification has conducting semi detail soil survey works that conducted by Param Agricultural Soil Survey, Sdn. Bhd. in November 2008. Soil survey for PT DLI and PT Milano, on the area covers about 6,010.00 ha and 670.70 ha, respectively. Soil Map is available in proper scale, i.e. 1:25,000 and 1:50,000. Summary of soil survey results towards soil peat distribution describes as follows:

- Soils in PT DLI (KWS and KSD) were fully covered by peat soil with several depth, divided into four categories, e.g.: shallow (50-100 m), moderate (100-150 cm), deep (150-300 cm) and very deep (>300 cm). All peat was categorized as marginal with saprist decomposition level.
- Soils in PT Milano (CDE) were dominated by peat soils for about 80 % (or 535.20 ha) with various depth from shallow to deep. The rest were mineral soils over recent riverine alluvium. Even though there is no fragile soil in CDE, however, it has the same main limitation with estates of PT DLI, which is has a very poorly drained soil property.

Peat Inventory Report

Process of peat inventory report of Wilmar Group has started submitted by Certification Lead and Supply Chain manager of Wilmar to GHG Unit of RSPO (ghg@rspo.org) as RSPO Secretariat representative on 05 November 2019 as verified through email record. Wilmar Group shows second submission to RGPS GHG Unit in 23 April 2020 which mentioned that the submission for Indonesia sites, Wilmar International Ltd. is refers to the Minister of Forestry and Environment Decree No. SK7099/MENLHKPKTL/IPSDH/PLA.1/8/2019 about Penetapan Peta Indikatif Penghentian Pemberian Izin Baru Hutan Alam Primer dan Lahan Gambut Tahun 2019 (PIPPIB) on the defining of peat areas in Indonesia. Latest response from RSPO GHG Unit was delivered on 19 May 2020 which informed that RSPO is acknowledge the receipt of the updated peat inventory and the submission of drainability assessment. RSPO later on will follow up and inform Wilmar Group if any further requirement and clarification is needed.

Based on the results of the review of the peat inventory document that has been sent, it is known that the area of planting on peat in PT DLI and PT Perkebunan Milano is 345.21 Ha.

7.7.3, 7.7.4

Procedure of peat monitoring and management is presented in document No. SOP-EST-028 (Rev. 00). The procedure mentioned that peat subsidence monitoring should be conducted every semester. Estate management are able to shows monitoring record of monthly water level and subsidency rate. Installation of subsidence stakes has been carried out since 2010 and Records of monitoring of peat soil subsidence are recorded in Form No. document. FRM-EST-022-032 (Rev. 02).

The results of interviews with management revealed that peatland management includes monitoring subsidence, water management with stop bunds and watergates, monitoring water level (weir) and groundwater level. for example peat management in KSD:

In KSD's groundwater measurement report, the company has installed 71 piezometers to measure the water level in peatlands in blocks. Monitoring was carried out for the period from January to June 2023. For example, the high water level training records in the block in June 2023 have water level intervals of 55-60 cm.

Subsidence or subsidence of peat occurs due to decomposition and/or compaction of drained peat soil. Subsidence is important to monitor because it is an indicator of successful management of water in peat areas. Based on the results of the document review, it is known that in KSD there are 09 subsidy points. During the audit, the results of monitoring for the period January to June 2023 can be shown, which are set forth in the Monitoring document for the Quarterly Subsidence of Peat Lagan. Based on monitoring results, it is known that in 2023 the average decrease is around 2 cm/year

Based on the description above, it can be concluded that the company has carried out monitoring of land subsidence, water management with embankments and sluice gates, monitoring of water levels (dams) and groundwater levels.

7.7.5

The company does not have a replanting plan for the next 5 years and there is no planting year more than 15 years. So a drainability assessment has not been carried out.

7.7.6

As informed on semi detail soil survey report that conducted by Param Agricultural Soil Survey, Sdn. Bhd. in November 2008, it was known that main soil limitation in PT DLI and CDE-PT Perkebunan Milano were due to presence of peat soils which has a very poorly drained soil property. Agronomy strategy to overcome this situation was refers to procedure No. SOP-EST-022 and document No. SOP-EST-028 (Rev. 00) dated 01 February 2015. Based on field observation and document review, several strategies which already implemented by estate management was adoption a proper peat management as follows:

- Water managemet through maintaining water level at 60-80 cm and monitoring of peat subsidency rate as indicator of water management quality.
- Installing field drain with pattern 1:4 and flap gate.
- Canal desilting for water discharge and application of kaptan (CaCO_3) which aims to increase soil pH.
- Peat compaction with "hole in hole" planting method, which starts implemented on palms planted in 2014 forward.
- Maintaining land cover crop which aims to retain soil moisture on the field.
- Fertilizer applicaiton as in accordance with Agronomist recommendation, especially additional micronutrient on B, Cu and Zn.
- Carry out mounding palm activities to fixing sloping palm trees.

7.7.7

All peat areas located in PT DLI and KCD of PT Perkebunan Milano are located in planting areas and other operational areas. There are no reserved peat areas/peatland conservation areas. The peat area has been managed according to the applicable regulations.

	Status: Comply
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7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The certification unit has a water management plan that is implemented to support efficient use of water sources and continuous availability, through operational procedure documents (SOP-GEN-018) dated November 04, 2021. To avoid negative impacts on other users in the water catchment area, the company carried out activities, including: prohibiting the planting of oil palm on the river border with a width of 50-100 meters left and right, prohibiting land cultivation on the river border by installing notice boards, constructing boundary roads in managed areas, cultivation without spraying around the river, and manual maintenance.

Test results related to surface water quality monitoring in December 2022 located in the Barumun River were carried out by a KAN-accredited laboratory with Number LP-1576-IDN. The test results are all parameters that are in accordance with the applicable quality standards.

The company also provides alternative drinking water that can be consumed directly in the form of water that comes from drilled wells but has gone through a very good and controlled filtering process at the Reverse Osmose (RO) filtering installation. Drinking water testing is also carried out by the company to see the quality of drinking water taken from drilled wells which is carried out by a KAN-accredited laboratory. The results of testing the quality of drinking water also show that all the parameters of the test results are still in accordance with the applicable quality standards, namely Regulation of the Minister of Health Number 32 of 2017.

Based on the results of observations and interviews in the housing area in Sei Deras and Cabang Dua Estates, information was obtained that clean water facilities for housing were obtained from water depot (Reverse Osmose).

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

7.8.2

The unit of certification has procedure of Conservation area identification and management with number SOP-GEN-010, Rev-01 dated 01 May 2015. This procedure were explained about:

- Conservation area identification
- Feasibility assessment of conservation area management
- Prohibition of spraying and fertilizing activities on riparian zone (3-5 meters from the river).

Based on interview with spraying workers in KCD and KSD sighted that they has known about this procedure. Based on the results of field observations in the conservation area, the Biru Lake Block have been equipped with spray boundary signs, protected area boards, and planted with vetiver grass in in order to erosion-preventing on riparian area.

7.8.3

Management of POME from oil palm processing from the DLI-02 Mill with totaling 9 waste ponds a single feeding system with total volume capacity 83.411 m³. Before being used, the liquid waste is processed until it reaches the standard for wastewater utilization in oil palm plantations, with pH 6-9 and BOD 5000 mg/l. POME is managed in accordance with applicable national regulations, according KepmenLH No. 29 of 2003 regarding Technical Guidelines for Assessment of Wastewater Utilization from Palm Oil. Wastewater from the WWTP pond outlet is then pumped and used as a designated location for the use of waste water on the ground (Land Application).

The company already has a permit for the utilization of POME for Land Application (LA) from the authorized agency in the form of *DPMPPTSP* of Labuhanbaru Regency No. 503.660.31/266/DPMPPTSP-BP2MNP/2018, dated 4 May 2018.

The company can show documents regarding the results of the measurement of the quality of POME, namely the POME Report per quarter and the RKL-RPL Implementation Report per semester which includes the results of the measurement of the quality of POME every month and land application monitoring well. The test is carried out by the Laboratory which has been accredited by KAN (LP-1296-IDN). Based on the analysis of the test document, it shows that all the parameters tested are in accordance with the applicable quality standards (especially for pH and BOD) and for waste water utilization to be applied to land its does not cause pollution to the environment. Based on field observation at land application flatbed, there is no indication of a leak in the channel, the officer can carry out the procedure properly.

Based on interviews with people from the villages around the company, they stated that there was no pollution from the liquid waste produced by the company, this was also because the WWTP was in the middle of the estates.

Regarding the obligation of the *Sistem Pemantauan Kualitas Air Limbah Secara Terus Menerus dan Dalam Jaringan* (SPARING), the company has submitted a registration application on July 6 2022, then until June 29 2023 it is still waiting for the validation process from the KLHK. Based on this description, the company has the opportunity to ensure that these obligations are fulfilled. **OFI**

7.8.4

PT Daya Labuhan Indah has a utilization permit based on the BPPT of Sumatra Utara Province No. 610/116/BPPTSU/2/12.1/X/2014 dated October 14, 2017 and is valid for 3 years since it was stipulated. The license has expired in October 2020 and the company has shown Letter No. 004/PKS-DLI2/SP/X/2020 concerning Application for Surface Water Technical Recommendations from PT Daya Labuhan Indah PKS Wonosari to the Head of the *Dinas Sumber Daya Air, Cipta Karya dan Tata Ruang* of Sumatra Utara Province which was received on 01 October 2020.

Until the ASA 1.4 assessment is carried out, the company can show the progress of obtaining permits through a follow-up letter on the feasibility study with No. G10/PJSA/V/1332/2023 from the *Dinas Sumber Daya Air, Cipta Karya dan Tata Ruang* of Sumatra Utara Province on 23 May 2023 stating that all documents have been verified and declared appropriate, for further processing of permits. Based on this description, the company has the opportunity to ensure that the permit is fulfilled in accordance with applicable legal obligations.

The water usage for FFB processing has been monitored and documented. The document of water usage for FFB process in period of January – December 2022 shown that the water usage ratio in the range of 9,865.17 m³/month. This range is still in accordance with the water quotas that can be utilized specified in the permit and budget determined by the company itself. The unit certification also paid of water usage retribution every month for the entire scope of certification to UPT Rantau Prapat, Sumatra Utara Province.

From the results of management interviews and field observations to Water Treatment Plan (WTP) in DLI-02 POM, found that flowmeter used is still functioning properly, so the amount of water used every day are recorded well, the officer responsible for WTP is understanding about how the to operate WTP according to procedure.

Status: Comply

7.9

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

7.9.1

The unit of certification using of fossil fuels to increase the efficiency and to optimize monitored and renewable energy. This can be proven by recording documents on the application of the use of shells and fiber from the rest of the mill production process as renewable fuel for boiler purposes in 2022.

Based on the results of interviews and document verification, it shows that all solid waste in the form of shells and fiber is used to substitute diesel fuel, this utilized and the usage data recorded in detail and traceable for the period 2022. From data shows, it is known that the company has saved 95.25% of diesel fuel, of the total diesel that should have been used as evidence of energy efficiency produced from use of renewable energy.

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

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

Unit of certification has been conducted source identification and GHG valuation by doing GHG inventory within the scope of Daya

Labuhan Indah-2 POM and its supplies based (Sei Deras Estate, Wonosari Estate, Cabang Dua Estate, and Marbau Estate) monitored through Palm GHG Calculator 4.0 and the summary result reported and accessible to public in RSPO website. The company has identified the significant GHG emissions, including: land used change, POME processing, used of fertilizers and pesticides, used of fossil fuels for operations and transportation.

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

Reduction of fossil fuels at Daya Labuhan Indah-2 POM has been implemented by using fiber and shells. The company also uses POME with test results from the monitoring, showing that all wastewater testing parameters have met the applicable quality standards. Based on the review of documents for example: monitoring of pesticide use, monitoring of diesel fuel, identification of HCVs and others it is found that accurate data have been entered into the RSPO palm oil GHG Calculator. GHG calculation using palm GHG Calculator 4.0. The summary of GHG emissions for the period January - December 2022, is listed as follows:

Summary Emissions

Description	Value	Unit	Description	Value	Unit
CPO	0.79	tCO ₂ e/tProduct	Oil palm planted on mineral soil	6045.93	Ha
PK	0.79	tCO ₂ e/tProduct	Oil palm planted area on peat	345.21	Ha
PKO	0.00	tCO ₂ e/tProduct	Total oil palm planted area	6378.64	Ha
PKE	0.00	tCO ₂ e/tProduct	Conservation area (Forested)	0.00	Ha
OER	20.61	%	Conservation area (non-Forested)	27.70	Ha
KER	3.33	%	FFB Production per hectare	23.05	t/ha

Mill Emissions and Credits & Emissions from Palm Kernel Crusher

Mill Emissions and Credits			Emissions from Palm Kernel Crusher	
Emission Source and Credits	tCO ₂	tCO ₂ e/t FFB	Emission Source	tCO ₂ e
POME	0.00	0.00	PK from own mill	0.00
Fuel Consumption	185.36	0.00	PK from other sources	0.00
Grid Electricity Utilization	0.00	0.00	Fuel Consumption	0.00
Export of Excess Electricity to Housing & Grid	0.00	0.00	Total Crusher Emissions	0.00
Sale of PKS	0.00	0.00		
Sale of EFB	0.00	0.00		
Total	185.36	0.00		

Estate / Plantation Field Emissions and Sinks

Description	Emission (tCO2e)			TOTAL
	Own	Group	3rd Party	
Emission Source				
Land Conversion	55258.26	65.14	0.00	55323.39
CO2 Emissions from Fertilizer	3148.63	365.73	0.00	3514.36
N2O Emissions from Peat	2490.59	0.00	0.00	2490.59
N2O Emissions from Fertilizer	1969.13	174.93	0.00	2144.06
Fuel Consumption	1305.68	133.59	0.00	1439.27
Peat Oxidation	18165.95	0.00	0.00	18165.95
Sinks				
Crop Sequestration	-52377.48	-3937.35	0.00	-56314.83
Sequestration in Conservation Area	0.00	0.00	0.00	0.00

Total	29960.76	-3197.97	42193.60	26762.79
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Palm Oil Mill Effluent Treatment				
POME Treatment	Unit	Value		
POME Diverted to Compost	%	0		
POME Diverted to anaerobic digestion	%	100		
• POME to anaerobic pond	%	100		
• POME to methane capture (flaring)	%	0		
• POME to methane capture (electricity generation)	%	0		

**POME is processed in WWTP*

In the GHG calculation, there is an excess of HCV area because it includes supply based which is not included in the unit of certification. While 11.73 ha is the HCV area for unit of certification (Sei Deras Estate, Wonosari Estate, and Cabang Dua Estate).

7.10.2

Unit of certification did not carry out new developments above 2014 in the operational area, but the company still manages GHG by taking an inventory of emission sources. They can show identification documents of activities that generate emissions for the period 2022 for Mills and Plantations. This is done to estimate carbon stocks in the management area and potential sources of emissions that can occur directly due to the management. A plan to minimize these emissions is drawn up and implemented, for example are;

- Using 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
- Reforestation around the factory and residential areas
- Applying POME to the surrounding LA area.
- Testing the source of emission (chimney and boilers) periodically through air pollution reduction.

7.10.3.

The unit of certification has identified source of waste pollution and emissions from Estate and Mill activities for the period 2023. Sighted the result of identification of emissions and pollution as well as its sources, such as in estate emissions sources are from fossil fuel usage for transportation and generator, emission from fertilizer usage, pesticide usage and electricity usage. Identified the sources of emission and pollution from mill such as fossil fuel usage, electricity usage and WWTP. In addition, the company also conducts tests related to odour and vibration tests in work and residential areas.

Fossil fuel reducing have been implemented on DLI-2 POM by fiber and shell usage. Realization of renewable energy have been monitored on monthly report for fiber and shell usage. Monitoring for emission and pollutants (air emission and air ambient) from Estate and Mill was done periodically and comply with the standards quality, it's covered on RKL/RPL implementation report and reported to Environmental Agency of Labuhanbatu Regency. Therefore, it can conclude that the plans to reduce or minimize the pollutants are implemented and monitored well by management.

	Status: Comply	
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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 already has a Zero Deforestation, Zero Peat and Zero Exploitation policy which was stipulated on December 5, 2013 explaining among other things that the company does not burn for land clearing and preparation for new plantings, replanting or other development in accordance with the full scope of the policy.

Based on this policy, it can be concluded that the company does not clear land by burning it.

7.11.2

The company already has fire control facilities and infrastructure and has carried out periodic inspections, for example for the July 2023 kws period, as outlined in the following table:

No.	Equipment	Quantity	Condition
1	Operational vehicle	2 unit	Good
2	Water pump	7 unit	Good
3	Hose	9 pcs	Good
4	Shovel	13 pcs	Good
5	fire extinguisher	40 pcs	Good
6	Ambulance	1 unit	Good
7	Evacuation Stretcher	1 unit	Good
8	Fire Control Tower	1 unit	Good
9	Bells/ Siren	2 unit	Good
10	Firefighter Clothes	7 pairs	Good
11	Fire Shoes	7 pairs	Good
12	Fire Gloves	7 pairs	Good
13	Fire Helmet	7 pcs	Good
14	First Aid Box	2 box	Good

The company shows a list of fire control facilities and infrastructure documents, which among others are listed in the document List of Facilities and Infrastructure for Prevention and Management of PT DLI Land and Estate Fires, July 2023 Period which was approved by the Company's Leaders. Based on these documents, it is known that the facilities and infrastructure owned refer to the Minister of Agriculture Regulation Number 5 of 2018.

The company shows a list of fire control facilities and infrastructure documents, which among others are listed in the Fire Prevention and Management Facilities and Infrastructure List document and are in good condition, besides that based on the results of interviews with the company that the company already has plans for additional facilities and infrastructure for fire control in 2023-2027.

Based on the results of the PT DLI 2 Hydrant TEST shown, it is known that the fire control facilities and infrastructure owned are in good condition and fit for use.

Based on this explanation, the company already has fire emergency response facilities and infrastructure.

7.11.3

Based on the results of interviews with village community representatives, the company has carried out socialization for fire prevention measures such as prohibiting land clearing by burning or based on a signboard prohibiting fire prevention, Fire external training, emergency response, and first aid for BPBD, Labuhan Batu district, August 29, 2022 followed by all estates and stakeholders.

Status: Comply

7.12

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

7.12.1

Based on information on plantation management and a review of the hectare statement until 1.4 assessment audit held, it is known that there was no additional planting or expansion of the plantation operational area after November 15, 2018.

Certification unit do not conduct any new development since November 2005. PT Daya Labuhan Indah and PT Perkebunan Milano has conduct disclosure to RSPO on July 2014, and as a result RSPO has confirmed PT Daya Labuhan Indah and PT Perkebunan Milano as zero liability on 2017.

7.12.2

Consistent with previous audits, there is no additional planting or expansion of the plantation operational area after November 15, 2018. The certification unit has identified HCVs by RSPO Appraisers who have been approved in 2013 for PT Daya Labuhan Indah and in 2009 for PT Perkebunan Milano (Cabang Dua Estate). The following is a further explanation:

- The unit of certification has identified protected, rare, rare, or endangered species, and habitats with high conservation value in

2013 at PT Daya Labuhan Indah. The HCV identification activity was carried out using the HCV toolkit and involved stakeholder participation through a public consultation conducted on 6 May 2013. The identification was carried out in collaboration with a third party, namely Remark Asia. The identification team consists of 8 people of which 3 have been RSPO Approved. From the identification results, it was found that there were HCV 1.1, HCV 1.3, HCV 1.4, HCV 2.3 and HCV 3 covering an area of 3.42 Ha (Biru Lake). In addition, there is also an HCV 4.3 covering an area of 5.7 Ha which functions as a natural barrier to prevent the spread of fires (firebreaks).

- The unit of certification has identified protected, rare, rare, or endangered species, and high conservation value habitats at PT Perkebunan Milano (Cabang Dua Estate). Identification was carried out in collaboration with a third party, namely Aksenta, in July 2009. The identification team consisted of 3 people, 3 of whom were RSPO approved. From the identification results, it was found that there is HCV 4.3 covering an area of 2.36 Ha which functions as a natural barrier to prevent the spread of fires (firebreaks) and HCV 6 covering an area of 0.25 Ha is an area that has an important function for the cultural identity of the local community (cemetery area).

HCS does not apply to the unit of certification this time, because the unit of certification was already certified before the issuance of regulations regarding HCS. **The total area of HCV in the unit of certification is 11.73 Ha.**

7.12.3

Indicator 7.12.3 currently irrelevant to Indonesia, until further decisions from the RSPO.

7.12.4

Unit of certification has carried out activities in order to maintain HCV, that has been in line with its planning and reviewed HCV Management Plan 2022-2023 PT Daya Labuhan Indah, there are;

- Conduct definitive measurements of the Biru Lake area.
- Making boundary markers for HCV areas.
- Installation and maintenance of HCV area information boards and restrictions.
- Washing collection ditches and boundary ditches.
- Monitor the presence of plant and animal species in the operational area.
- Conduct monitoring of potential fires.
- Poaching patrols.
- Monitor land subsidence using peat subsidence.
- Maintain the existence of flora and fauna in the Danau Biru.

The company also has a report on the Implementation, Management and Monitoring of High Conservation Value Areas including RTE monitoring which was reported annually, for example on 25 Agustus 2022 to BKSDA Sumatra Utara Province.

7.12.5

As a result of field visits to the HCV areas managed by the company, there were 6 HCV areas in the form of a public cemetery area in Cabang Dua Estate.

However, the company continues to pursue an approach to protect HCV areas in a way that also protects the rights and livelihoods of local communities. Among them by conducting socialization about HCV periodically to find out the extent of community understanding of the existence of HCV and installing sign boards as an indirect socialization effort in areas that are often passed by the community.

7.12.6

The RTE species protection policy is contained document procedure of management of HCV areas (No 20 / WIP-KB/(01)/2015) regarding and procedure for Wildlife Protection (No. SOP 15/WIP-KB/(01)/2015) it is explained that the company will cooperate with the local institution (BKSDA) for the handling of wild animals found in the company's HGU area.

The company also has a flora and fauna monitoring program which is scheduled every semester to update flora and fauna data found in the company area. Based on Monitoring Report document for 2022, the results of identification of protected fauna were obtained, consisting of 1 mammal and 11 types of aves, including; *Prionailurus bangalensis*, *Egretta spp.*, *Eleanus caerlus*, *Haliastur indus*,

Spilornis cheela, Actenoides spp, Rhipidura javanica, Alcedo euryzona, Cyornis spp, Lonchura spp, Varanus spp, and Otus spp.

The company also carries out socialization to workers, contractors and the community around as a program to educate the status of RTE species, with examples of evidence in the minutes as follows:

- Socialization of HCV including the RTE species to employees which was carried out on 31 May 2023 and 07 July 2023.
- Socialization of HCV including RTE species to the surrounding community which was carried out on 12 January 2023 and 15 June 2023.

Based on the results of interviews with residents of Sei Deras Estate Division I housing and spray workers at Cabang Dua Estate, they also stated that they knew about the conservation and protection of HCV areas and the prohibition against hunting, logging and burning forests. Respondents added that apart from direct outreach, the company also installed warning boards or signboards indicating HCV areas and prohibitions on environmental destruction, which were forms of indirect socialization.

7.12.7

The unit of certification has conducted annual monitoring and evaluation for the management of HCV areas where this activity aims to identify risks and impacts on conservation areas and improve protection efforts.

The company also has an HCV management plan document for the 2023 period in accordance with the results of the review in 2022. The following HCV area management programs are listed, including:

- HCV Patrol Report for the 2022 period to ensure the condition of HCV areas against poaching and illegal logging.
- Outreach to workers and the community regarding HCV and Wildlife
- Monitoring of HCV attributes every 3 months.
- Report on flora and fauna monitoring conducted every 6 months.
- Monitoring tree planting in HCV Areas in 2022

The company has shown evidence that HCV area management has been carried out quite well, the results of field visits to several HCV area locations show that HCV is in a stable condition. No destruction of HCV or entanglement of animals was found. The results of interviews with employees in the field conveyed that employees had received socialization regarding the prohibition of hunting and spraying in water catchment area.

HCV monitoring is periodically evaluated by unit of certification every 3 years and is used as a reference as a management plan for HCV management. The management plan is implemented effectively based on the results of monitoring from the previous period. All evaluation results will be reviewed and will be adjusted to the HCV management program in the 2024 period and involving relevant stakeholders.

7.12.8

As explained in indicator 7.12.1, the company has no obligation to implement RaCP. In addition, up to an assessment of 1.3, it is known that there was no additional planting or expansion of the plantation operational area after November 15, 2018. Therefore, this indicator is not applicable.

Status: Comply

3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or√
ASA-1.4	DLI-2 POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or√
ASA-1.4	DLI-2 POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or√
ASA-1.4	DLI-2 POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or√
ASA-1.4	DLI-2 POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	

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 labor disputes that are not being resolved through an agreed process.
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	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>https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-benso-oil-palm-plantation-bopp</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>https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-limited-biase-plantation-limited-calaro-extension</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 https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/grievance/grievance-sop/grievance-procedure_final.pdf?sfvrsn=7670cea2_2</p>
2.1.3	Any new plantings since January 1 st , 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 Mpohor District of the Western Region of Ghana. The RSPO NPP summary management plan and NPP notification available in RSPO.</p> <p>https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-benso-oil-palm-plantation-bopp</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>https://www.rspo.org/certification/new-planting-procedure/public-consultations/wilmar-international-limited-biase-plantation-limited-calaro-extension</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</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>as link below; https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/wilmar-whistleblowing-policy.pdf</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; https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/grievance/grievance-sop/grievance-procedure_final.pdf?sfvrsn=7670cea2_2</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 & 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 land conflicts.</p> <p>There are no reports of legal disputes at the time of reporting.</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.</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>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 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 Findings, Corrective Actions and Observations at ASA-1.3 Assessment

NCR No.	:		Issued by	:	
Date Issued	:		Time Limit	:	
NC Grade	:		Date of Closing	:	
Standard Ref. & Requirement	:				
Evidence observed (filled by auditor):					
Non-Conformance Description (filled by auditor):					
No NC during surveillance 1.3 audit					
Root Cause Analysis (filled by organization audited):					
Correction (filled by organization audited):					
Corrective Action (filled by organization audited):					
Assessor Evaluation and Conclusion (filled by auditor):					
Verified by	:				

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

NCR No.	:		Issued by	:	
Date Issued	:		Time Limit	:	
NC Grade	:		Date of Closing	:	
Standard Ref. & Requirement	:				
Evidence observed (filled by auditor):					
<i>There is No non-compliance was found in this RSPO ASA-1.4 onsite audit activity.</i>					
Non-Conformance Description (filled by auditor):					
Root Cause Analysis (filled by organization audited):					
Correction (filled by organization audited):					
Corrective Action (filled by organization audited):					
Assessor Evaluation and Conclusion (filled by auditor):					
Verified by	:				

3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	2.1.1	<p>The unit of certification complies to relevant regulations</p> <p>PT Daya Labuhan Indah has Surface Water Utilization Permit issued by the BPPT for Sumatra Utara Province No. 610/116/BPPTSU/2/12.1/X/2014 dated October 14, 2017. and is valid for 3 years from the date of stipulation. The license expired in October 2020.</p> <p>The company has shown Letter No. 004/PKS-DLI2/SP/X/2020 dated 01 October 2020 concerning Application for Surface Water Technical Recommendations from PT Daya Labuhan Indah PKS Wonosari to the Head of the Water Resources Office Cipta Karya and Spatial Planning of Sumatra Utara Province which was received on 01 October 2020.</p> <p>Until the ASA 1.4 assessment is carried out, the company can show the progress of obtaining permits through a feasibility study follow-up letter with No. G10/PJSA/V/1332/2023 from the Office of Water Resources, Cipta Karya and Spatial Planning of Sumatra Utara Province on 23 May 2023 stating that all documents have been verified and declared appropriate, for further processing of permits.</p> <p>Based on this description, companies have the opportunity to ensure that permits are fulfilled in accordance with applicable legal obligations.</p>
2	4.4.1	<p>Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>PT DLI</p> <p>The total HGU of PT Daya Labuhan Indah is 4,694.5 hectares with details of HGU Certificate No. 1 issued by the Labuhanbatu Land Office on 29 September 1992 for an area of 4,694.5 Ha ending on 31 December 2022.</p> <p>Based on the results of a document review, interviews with management and interviews with the Labuhanbatu Regency Land Office, it is known that the validity period of the HGU Certificate has expired on December 31, 2022.</p> <p>The company shows:</p> <ul style="list-style-type: none"> Letter from the Regional Office of the National Land Agency of Sumatra Utara Province to the Director General of Agrarian Infrastructure u.b. Director of Cadastral Measurement and Mapping of the Ministry of Agrarian Affairs and Spatial Planning, Number UK.01.01/191-12/1/2020, regarding Application for Measurement of HGU Extension No. 1381 former HGU No. 1 in the name of PT Daya Labuhan Indah covering an area of 4,694.5 Ha located in Kampung Bilah Village d/h Bilah Village, Bilah Hilir District, Labuhanbatu Regency, Sumatra Utara Province, dated January 10 2020, which among other things explains that in accordance with article 77 paragraph (1) letter b PMNA No.3 of 1997, the measurement authority lies with the Ministry of Agrarian Affairs and Spatial Planning/ BPN. Letter from the Ministry of Agrarian Affairs and Spatial Planning/ BPN Directorate General of Land and Spatial Surveying and Mapping to the Head of the Regional Office of the National Land Agency for Sumatra Utara Province, Number 180/SP-300.16.UK.01.01/IV/2023, regarding Lack of Application Files for Extension Measurement HGU No. 1381 former HGU No. 1 in the name of PT Daya Labuhan Indah covering an area of 4,694.5 Ha located in Kampung Bilah Village d/h Bilah Village, Bilah Hilir District, Labuhanbatu Regency, Sumatra Utara Province, dated June 16 2023, which includes explaining: <ul style="list-style-type: none"> Whereas in order to complete the requirements for PT Daya Labuhan Indah's measurement application, there are several documents that must be completed (12 documents)

		<ul style="list-style-type: none"> - Because the HGU certificate has expired on 31 December 2022, the process for applying for rights is through a rights renewal mechanism for 2 years after the end of the HGU period in accordance with Minister of ATR/BPN Regulation Number 18 of 2021 Article 71 paragraph (2) - PT Daya Labuhan Indah's application can be followed up if the above conditions are met and existing land problems have been resolved. <p>During the audit activity, it was discovered that the Sumatra Utara Provincial BPN Team was conducting an HGU Map Study and field activities.</p> <p>CDE – PT Perkebunan Milano The process for extending the HGU has resulted in the issuance of the Sector Map on December 10, 2020 with an area of 646.10 Ha. (The difference in area is due to differences in measurement methods, but for the actual location there is no change).</p> <p>The company has the opportunity to ensure that the HGU renewal process is in accordance with the applicable laws and regulations.</p>
3	6.2.2	<p>Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p> <p>The company has the opportunity to immediately provide a response from Top Management to workers through the Labor Union.</p>
4	6.2.4	<p>The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>Clean Water Wells and their Installation. The results of interviews with CDE workers found that there were workers' complaints regarding the availability of clean water. Then the results of field observations in housing found that there were several gutters for rainwater collection and several rainwater storage tanks in damaged condition making it difficult to get clean water, some workers drilled wells independently.</p> <p>In this regard, the company indicated a 2022 budget of IDR 200,000,000 for water drilling and pipe installation in CDE housing. In addition, the company can show documents:</p> <ul style="list-style-type: none"> • Budget plan of IDR 190,605,000 for the water drilling. • Material PO documents on November 28, 2022 • Documents for receiving pipe material on January 31, 2023. <p>The company explained that currently the prospective Vendor/Contractor who will work on the drilling and installation will immediately carry out a survey with a team of experts. Furthermore, the signing of the Agreement will be carried out and the project for drilling and water pipe installation will be carried out immediately.</p> <p>The company has the opportunity to immediately carry out drilling and installation of water pipes in employee housing</p>
5	7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p>

		<p>Based on the results of a field visit to the Empty Bunch Area, it is known that the empty bunches stored are in a piled-up condition, due to the non-operation of the stoves in the mill. In the ASA 1.3 activity, it is planned to build an incinerator with a capacity of 30 tons.</p> <p>However, the plan was changed to build a boiler with a capacity of 25 tons. Until the ASA 1.4 assessment is carried out, the company can show development progress including;</p> <ul style="list-style-type: none"> • Proof of e-mail regarding offers and budgeting for boiler units as of 13 July 2023. • E-mail proof of <i>PERTEK</i> air emission arrangements (for boilers) as of July 13, 2023, currently in the drafting process by consultants. <p>Based on this description, the company has the opportunity to ensure that the permit is fulfilled in accordance with applicable legal obligations.</p>
6	7.8.3	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p> <p>The company has a POME as a form of management of liquid waste resulting from FFB processing before being discharged into water bodies. With a permit to discharge liquid waste into water bodies based on Decree <i>DPMPTSP</i> Labuhanbatu Regency No. 503.660.31/266/DPMPTSP-BP2MNP/2018 dated 4 May 2018.</p> <p>Regarding the obligation of the <i>Sistem Pemantauan Kualitas Air Limbah Secara Terus Menerus dan Dalam Jaringan</i> (SPARING), the company has submitted a registration application on July 6 2022, then until June 29 2023 it is still waiting for the validation process from the KLHK.</p> <p>Based on this description, the company has the opportunity to ensure that these obligations are fulfilled.</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	Presentation of documents is quite good
4	Obtained ISPO certificate
5	Company participation in the PROPER assessment with a Blue predicate for the 2021-2022 period (Daya Labuhan Indah 2 POM)

3.5 Summary of Arising Issues from Public and Auditor Verification



Public Issues (Institution/ NGO/Community)	Auditor Verification
National Land Agency of Labuhanbatu Regency <ul style="list-style-type: none"> There is no issue of land disputes The company's relationship with Land Agency is going well There is <i>HGU</i> which is in the process of being renewed. 	There are no negative issues that need further verification.
Environmental Agency of Labuhanbatu Regency <ul style="list-style-type: none"> Related to environmental permits, there is no change in scope. The company already has permits related to the environment such as permits for Temporary Storage of Hazardous and Toxic Waste, permits for land applications. The company has carried out mandatory environmental reporting to the district government. There are no environmental issues in the company area that have been included in the environmental service in the last 1 year. During the last 1 year there was no incident of fire in the company area. In general in terms of environmental aspects, the company has complied with applicable regulations. 	There are no negative issues that need further verification.
Manpower Agency of Labuhanbatu Regency. <ul style="list-style-type: none"> Mandatory reports related to employment have been submitted regularly There are no complaints regarding labor issues (child labour, worker discrimination, forced labor and so on). The company pays wages according to local government regulations Workers have been registered with the Social Insurance (<i>BPJS</i>) Health checks have been carried out for workers. 	There are no negative issues that need further verification.
Plantations Agency of Labuhanbatu Regency. <ul style="list-style-type: none"> For the administration of plantation business reporting submitted to the Provincial Plantation Office. The company has carried out social activities, for example CSR to the surrounding villages. There are no reports of land fires during 2023. There were no issues or complaints from the community regarding plantation and factory operations. 	There are no negative issues that need further verification.
Gender Comitee PT Labuhan Indah Source: Chair and Secretary of the Gender Committee Dated: 11 July 2023 <ul style="list-style-type: none"> The committee is formed with the management and membership of female employees and male representation. The committee's duties include conducting counseling on maternal and child health, women's skills, as well as preventing harassment and reporting procedures and providing assistance if there are complaints from members/employees regarding incidents of harassment. 	

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> There were no reports/complaints regarding acts of harassment or regarding gender-related violations experienced by members during 2022-2023. 	
Employee Cooperative of PT Labuhan Indah Source: Cooperative Secretary and Representatives of Sei Deras Estate and Wonosari Estate & DLI POM-2 Date: July 11, 2023 The cooperative is currently engaged in selling groceries to workers and the community at PT Daya Labuhan Indah. Current members are workers and employees at Sungai Deras Estate and Wonosari Estate including DLI POM-2. The last annual member meeting (RAT) is in June 2023, with discussion of one of them related to the plan to separate cooperatives for each Estate. The distribution of SHU will be distributed when the processing of new permits is completed (for the Sungai Deras Estate). Company support in the form of cooperative buildings and operational loans.	
Local Contractor – CV Baginda Jaya Date: July 11, 2023 Contractor activities in the field of housing construction at Wonosari Estate, PT Daya Labuhan Indonesia. Contract ends in May 2023, currently in the process of completion (for 3 a month extending). Contractor payments are made in 3 term, and are done on time. Provision of PPE is carried out by the contractor, in the form of safety helmets, shoes, and body harnesses. The contractor has enrolled its employees in the BPJS health program, in handling accidents through the clinic or nearest <i>puskesmas</i> .	
Local Contractor – Khairudin Hasibuan Date: July 11, 2023 Contractor for quoting seasonal loose fruit at PT Daya Labuhan Indonesia. The work contract is carried out per activity with a period of 1 month per contract. Contractor payments are made per month according to the contract and are paid on time. Provision of PPE is carried out by the contractor, in the form of helmets and boot shoes and obtains supervision from the company, in the form of mandatory use of PPE and safety briefings before work.	
Local Contractor – CV Albinery Date: July 11, 2023 Contractor activities in the field of FFB transporters at Sei Deras Estate, PT Daya Labuhan Indonesia. The cooperative relationship with the company has been going well since 2021.	

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>The work contract agreed is based on the FFB quota transported, which is for 2,000 tons. Payments are made every month on time.</p> <p>Provision of PPE is carried out by the contractor, in the form of helmets and boot shoes and obtains supervision from the company, in the form of mandatory use of PPE and safety briefings before work.</p>	
<p>Workers Union (SPSI, SBSI, SERBUNDO, METAL and MANDIRI) PT Daya Labuhan Indah & PT Perkebunan Milano Date: July 11 & 13, 2023</p> <ul style="list-style-type: none"> Trade unions have been formed and are still actively organized today. Bipartite meetings with companies and internal unions are held routinely, but if there are problems that can be discussed further. The company has also socialized the freedom of association policy to workers in the plantations and factories to continue to join the union without any coercion and during the process of selecting/forming union officials, there was no intervention/interference by the company (the workers did it independently). independent). The certification unit has implemented minimum wage standards, overtime and others in accordance with government regulations. The labor union that is active in the plantation unit has been officially registered as a labor union of PT Daya Labuhan Indah. 	
<p>Village Head and Community Leaders of Kampung Bilah Village July 11, 2023</p> <ul style="list-style-type: none"> There are no issues regarding land claims and disputes The company's concern for the community such as road repairs, washing canals, provision of educational facilities, assistance for religious and youth activities, mass medical treatment and others Information on job vacancies is conveyed openly through leaflets posted in strategic places There are no issues related to environmental pollution The preparation of the CSR program has involved village officials and community leaders One of the CSR programs that has been realized is goat farming The previous land owner was gone and the land compensation process had been completed when it was taken over to PT DLI Wilmar Has carried out fire prevention training activities in collaboration with related agencies. 	<p>There are no negative issues that need further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
Communication with the company is quite good, including through the public relations department	
Village Head and Community Leaders of Sei Tampang Village July 11, 2023 <ul style="list-style-type: none"> There are no issues regarding land claims and disputes The company's concern for the community such as road repairs, washing canals, provision of educational facilities, assistance for religious and youth activities, mass medical treatment and others Information on job vacancies is conveyed openly through leaflets posted in strategic places There are no issues related to environmental pollution The preparation of the CSR program has involved village officials and community leaders The company invites the village head and community leaders to prepare a CSR program at the beginning of each year There are local contractors partnering with the company One of the CSR programs that has been realized is goat farming The previous land owner was gone and the land compensation process had been completed when it was taken over to PT DLI Wilmar Has carried out fire prevention training activities in collaboration with related agencies. Communication with the company is quite good, including through the public relations department Aspirations: The company is expected to prioritize the surrounding community to become employees rather than those from other regions 	There are no negative issues that need further verification.
Village Head of Sei Nahodaris Village July 13, 2023 <ul style="list-style-type: none"> There are no issues regarding land claims and disputes The company's concern for the community such as road repairs, washing canals, provision of educational facilities, assistance for religious and youth activities, mass medical treatment and others Information on job vacancies is conveyed openly through leaflets posted in strategic places There are no issues related to environmental pollution The preparation of the CSR program has involved village officials and community leaders The company invites the village head and community leaders to prepare a CSR program at the beginning of each year There are local contractors partnering with the company 	There are no negative issues that need further verification.

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> • One of the CSR programs that has been realized is goat farming • The previous land owner was gone and the land compensation process had been completed when it was taken over to PT DLI Wilmar • Has carried out fire prevention training activities in collaboration with related agencies. • Communication with the company is quite good, including through the public relations department • Aspirations: The community asked for help planting grass for the community's livestock feed 	

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	<p>Formal Sign-off of Assessment Findings</p> <p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Daya Labuhan Indah Management Representative</p>  <p><u>Aswin</u> Thursday, 23 November 2023</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Octo HPN Nainggolan</u> Thursday, 23 November 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	Labuhanbatu Regency	-	Direct Interview	11 July 2023	√	
2.	Environmental Agency	Labuhanbatu Regency	-	Direct Interview	11 July 2023	√	
3.	Land Agency	Labuhanbatu Regency	-	Direct Interview	11 July 2023	√	
4.	Manpower Agency	Labuhanbatu Regency	-	Direct Interview	11 July 2023	√	
5.	Village Heads and Community Leaders of Sei Tampang Villages	Labuhanbatu Regency	-	Direct Interview	11 July 2023	√	
6.	Village Heads and Community Leaders of Kampung Bilah Villages	Labuhanbatu Regency	-	Direct Interview	11 July 2023	√	
7.	Village Heads and Community Leaders of Sei Nahodaris Villages	Labuhanbatu Regency	-	By Phone	13 July 2023	√	
8.	Gender Comitee	PT Daya Labuhan Indah	-	Direct	11 July 2023	√	
9.	Worker Cooperative	PT Daya Labuhan Indah	-	Direct	11 July 2023	√	
10.	Gender Comitee	PT Perkebunan Milano	-	Direct	11 July 2023	√	
11.	Worker Cooperative Milano Jaya Bersama (Cabang Dua Estate)	PT Perkebunan Milano	-	Direct	13 July 2023	√	
12.	CV Baginda Jaya	Labuhanbatu Regency	-	Phone	11 July 2023	√	
13.	Khairudin Hasibuan	Labuhanbatu Regency	-	Phone	11 July 2023	√	
14.	CV Albinery	Labuhanbatu Regency	-	Phone	11 July 2023	√	
15.	CV Chira Maju Berkah	Labuhanbatu Regency	-	Phone	13 July 2023	√	
16.	Sawit Watch	Bogor, Indonesia	info@sawitwatch.or.id	Email	4 July 2023		√
17.	WWF Indonesia	Jakarta, Indonesia	wwf-indonesia@wwf.or.id	Email	4 July 2023		√
18.	WALHI	Jakarta, Indonesia	informasi@walhi.or.id	Email	4 July 2023		√
19.	AMAN	Jakarta, Indonesia	rumahaman@cbn.net.id	Email	4 July 2023		√
20.	DLI 2 POM <ul style="list-style-type: none"> • 1 security people • 1 weighbridge officers • 1 grading officers • 1 storage operator • 1 WTP operator • 1 hazardous storage operaator 	PT DLI	-	Direct Interview	11 July 2023	√	
21.	Sei Deras Estate <ul style="list-style-type: none"> • 3 harvesters • 3 herbicide aplicators • 3 fertilizer worker • 2 storage operator 	PT DLI	-	Direct Interview	11 July 2023	√	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
	<ul style="list-style-type: none"> • 2 paramedic • 1 maid • 2 residence 						
22.	Wonosari Estate <ul style="list-style-type: none"> • 2 harvest worker • 3 loose fruit picker • 3 herbicide applicator • 1 warehouse officer • 1 paramedic • 1 mechanic workshop 	PT DLI	-	Direct Interview	11 July 2023	√	
23.	Cabang Dua Estate <ul style="list-style-type: none"> • 2 storage operator • 1 mechanic, 1 welder • 2 residence • 2 paramedic 	PT DLI	-	Direct Interview	13 July 2023	√	

Appendix 2. Assessment Program

DATE	10 – 15 July 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 10 July 2023		
05:30 – 07:10 08:00 – 16:00	<ul style="list-style-type: none"> Jakarta → Pekanbaru (Batik Air ID-6850) Pekanbaru → PT Daya Labuhan Indah 	All Auditor
16:00 – 17:00	Opening meeting <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	All Auditor
Tuesday, 11 July 2023		
08:00 – 12:00	Public Consultation : <ul style="list-style-type: none"> Public consultation with affected communities around the plantation and previous land owners. (direct interview) Public consultation with stakeholder to relevant agency in Labuhanbatu Regency Interviews with Gender Committees, Trade Unions, Local contractors, Employee cooperatives, third party suppliers (direct interview or by phone) 	AFF BEN MAY/ IDR
12:00 – 14:00	Break	All Auditor
14:00 – 16:00	Field observation to Daya Labuhan Indah 2 Palm Oil Mill <ul style="list-style-type: none"> Supply Chain Flow (Receiving FFB, Weighing FFB), CPO tanks and PK bulking Observation of the processing and mechanism of employment aspects Observation of Chemical Storage, PPE Storage, Hazardous Waste Storage, Fire Control Simulation Mill Waste Management / WWTP, WTP, monitoring wells, mill housing 	AFF BEN/ IDR BEN/ IDR MAY
16:00 – 17:00	Presentation of Daily Progress	All Auditor
Wednesday, 12 July 2023		
08:00 – 12:00	Field Observation Wonosari Estate & Sei Deras Estate Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries) and HCV Implementation of Environmental Aspects, Conservation, Waste Management, Waste, LA and HCV Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Observation of warehouses for chemicals, fertilizers, hazardous waste warehouses, workshops, fire control facilities and worker facilities (housing, schools, religious facilities) 	AFF AFF BEN/ IDR MAY
12:00 – 14:00	Break	All Auditor
14:00 – 16:00	<ul style="list-style-type: none"> Document review and completing audit checklist Verification of stakeholder consultation result and field visit 	All Auditor
16:00 – 17:00	Presentation of Daily Progress	All Auditor

DATE	10 – 15 July 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Thursday, 13 July 2023		
08:00 – 12:00	Field Observation Cabang Dua Estate Aspect to be verified : <ul style="list-style-type: none"> • Implementation of Legal Aspect (Land Ownership, Legal Boundaries) and HCV • Implementation of Environmental Aspects, Conservation, Waste Management, Waste, LA and HCV • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Observation of warehouses for chemicals, fertilizers, hazardous waste warehouses, workshops, fire control facilities and worker facilities (housing, schools, religious facilities) 	AFF AFF BEN/ IDR MAY
12:00 – 14:00	Break	All Auditor
14:00 – 17:00	<ul style="list-style-type: none"> • Document review and completing audit checklist • Verification of stakeholder consultation result and field visit 	All Auditor
Friday, 14 July 2023		
08:00 – 11:30	<ul style="list-style-type: none"> • Document review and completing audit checklist • Verification of stakeholder consultation result and field visit 	All Auditor
11:30 – 14:00	Break	All Auditor
14:00 – 16:00	Internal Meeting Auditor Team	All Auditor
16:00 – 17:00	Closing Meeting <ul style="list-style-type: none"> • Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timelie of CAR's, Conclusion) • Comments, Responses and Questions 	All Auditor
22:30 – 03:44	Rantau Prapat → Medan (by Train)	All Auditor
Saturday, 15 July 2023		
10:30 – 12:55	Medan → Jakarta (Garuda Indonesia GA-185)	All Auditor