

Roundtable on Sustainable Palm Oil Certification
R S P O

[✓] Surveillance

Name of Management Organisation : Palm Oil Mill 2 – PT Bio Inti Agrindo a subsidiary of Bio Inti Agrindo
 Plantation Name : PT Bio Inti Agrindo: Estate B, Estate C, and Plasma (Division 2, 3 and 4)
 Location : Village of Mandekman, Sub District of Ulilin, District of Merauke, Province of Papua Selatan, Indonesia
 Certificate Code : **MUTU-RSPO/159**
 Date of Initial Registration : 13 September 2021
 Date of Certificate Issue : 13 September 2021 Date of License Issue : 13 December 2023
 Date of Certificate Expiry : 12 September 2026 Date of License Expiry : 12 September 2024

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-2	19, 21, 22, 23 & 24 June 2023	Hasiholan Sihombing (Lead Auditor Witnessing), Afiffuddin (Lead Auditor Witnessed), Benli Manurung, Rizki Tanaya, and Alfiany Sukmawati	Moh Arif Yusni	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-2	08 November 2023

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 on March 12th, 2014, with registration number *ASI-ACC-055*

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Figure 1. Location Map of PT Bio Inti Agrindo – POM 2

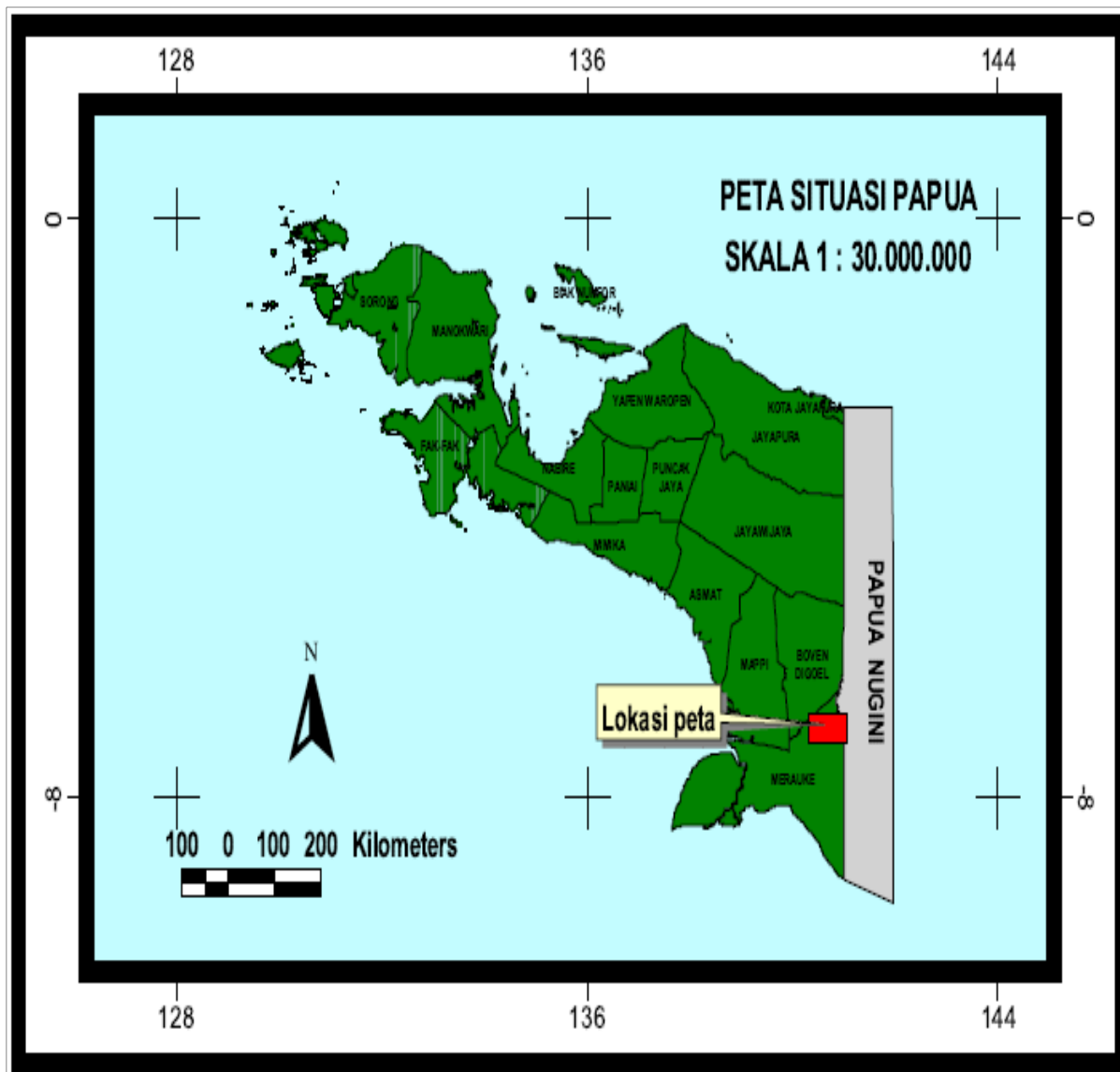
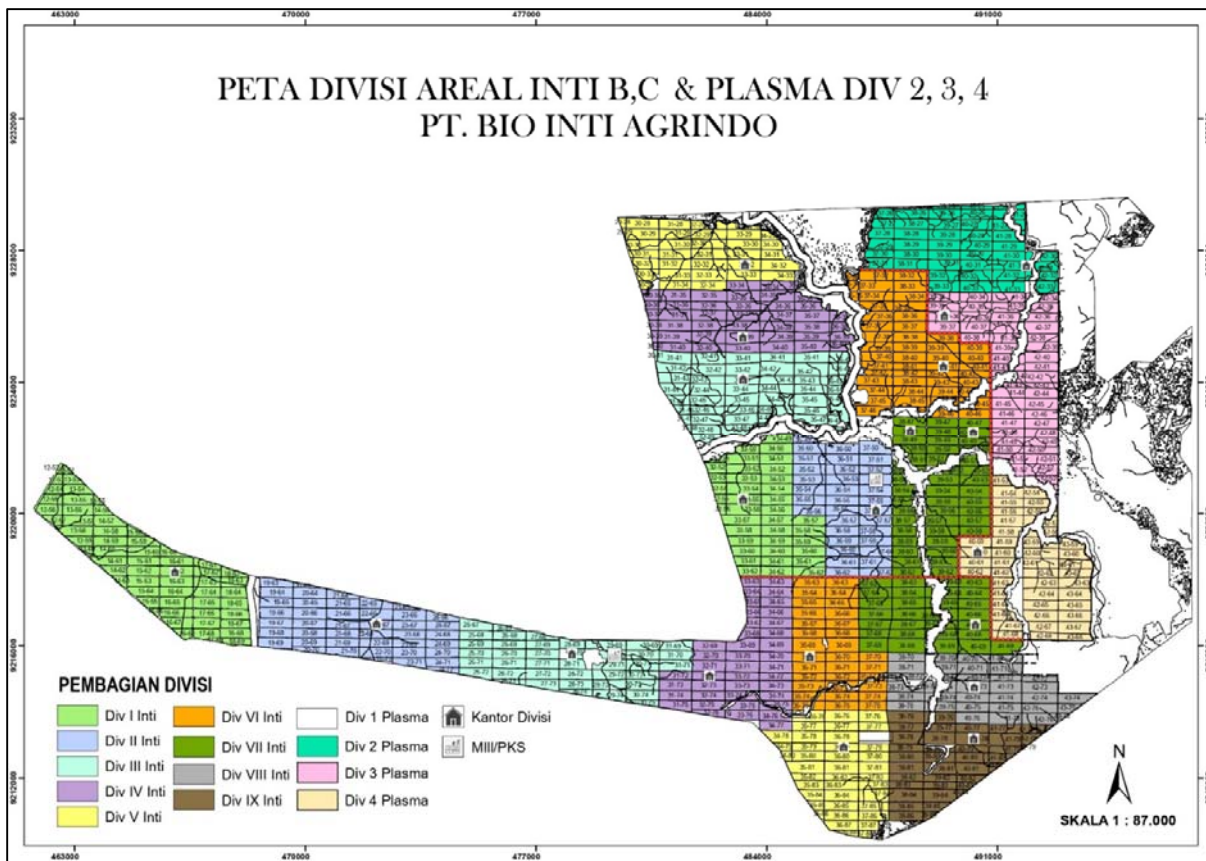


Figure 2. Operational Map of Bio Inti Agrindo – POM 2



Abbreviations Used

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

POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PR	:	Public Relation
RKL-RPL	:	<i>Rencana Kelola Lingkungan dan Rencana Pemantauan Lingkungan</i> (Environmental Management Plan / Environmental Monitoring Plan)
SCCS	:	Supply Chain Certification Standard
SDN	:	<i>Sekolah Dasar Negeri</i>
SIA	:	Social Impact Assessment
SIMPEL	:	Sistem Pelaporan Elektronik
SME	:	Small and Medium Enterprises
SMPN	:	<i>Sekolah Menengah Pertama Negeri</i>
SOP	:	Standard Operating Procedure
SSU	:	Soil Sampling Unit
TTE	:	Tanda Terima Elektronik
UKL-UPL	:	Upaya Kelola Lingkungan dan Upaya Pemantauan Lingkungan
UoC	:	Unit of Certification
UPTD	:	<i>Unit Pelaksana Teknis Dinas</i> /Service Technical Implementation Unit
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none">Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020.RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT Bio Inti Agrindo	
1.2.2	Contact person	Kartika Dewi	
1.2.3	Organisation address and site address	Head Office: Gedung Pacific Century Place, Lantai 17, SCBD Lot 10, Jl. Jendral Sudirman Kav. 52 - 53, Jakarta 12190	
1.2.4	Telephone	+ 62 21 80864070	
1.2.5	Fax	+ 62 21 80864100	
1.2.6	E-mail	bia@ptbia.co.id	
1.2.7	Web page address	www.ptbia.co.id	
1.2.8	Management Representative who completed the application for certification	Kartika Dewi	
1.2.9	Registered as RSPO member	1-0257-18-000-00 (27 July 2018)	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and its supply base: POM 2, Estate B, Estate C and Plasma (Division 2, 3 and 4)	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			LatitudeLongitude
	POM 2	Mandekman Village, Ulin Sub District, Merauke District, Papua Selatan Province, Indonesia	S 07° 05' 50"E 140° 48' 30"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			LatitudeLongitude
	Estate B	Mandekman Village, Ulin Sub District, Merauke District, Papua Selatan Province, Indonesia	S 07° 05' 45"E 140° 48' 05"
	Estate C	Mandekman Village, Ulin Sub District, Merauke District, Papua Selatan Province, Indonesia	S 07° 01' 55"E 140° 53' 25"

	Plasma (Division 2, 3, and 4) (269 members)	Mandekman Village, Ulilin Sub District, Merauke District, Papua Selatan Province, Indonesia	S 06° 59' 18"	E 140° 55' 35"			
1.5	Description of Area Statement						
1.5.1	Tenure						
	• State		27,527.62 Ha				
	• Community		- Ha				
1.5.2	Area Statement						
	Description	Estate B	Estate C	Plasma (Division 2, 3 and 4)	TOTAL (Ha)		
	• Total area	11,724.40	10,285.53	5,517.69	27,527.62 ha		
	• Mature area	8,866.14	7,437.02	3,549.01	19,852.17 ha		
	• Mill	23.30	32.35	-	55.65 ha		
	• Emplishment	29.12	28.16	10.00	67.28 ha		
	• Road, bridge and trench	188.47	148.90	70.99	408.36 ha		
	• River, valley, hill, swamp	332.67	294.90	127.33	754.90 ha		
	• Water bodies	1.00	1.00	-	2.00 ha		
	• HCV	2,283.69	2,343.20	1,760.37	6,387.26 ha		
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (ha)					
		Estate B	Estate C	Plasma (Division 2, 3 and 4)	Total		
	2014	2,907.07	-	-	2,907.07		
	2015	3,444.51	2,180.02	-	5,624.53		
	2016	1,352.06	3,881.95	-	5,234.01		
	2017	1,155.59	1,326.22	3,549.01	6,030.82		
	2018	6.91	48.83	-	55.74		
	TOTAL	8,866.14	7,437.02	3,549.01	19,852.17		
	1.6.2	New Planting area after January 2010		19,852.17 Ha			
1.6.3	Planting Cycle		1 st Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Output (tonnes)	Extraction (%)	Output (tonnes)	Extraction (%)

	POM 2	60	400,341.26	93,677.47	23.40	13,782.23	3.44
	*Production data source from 12 months before assessment (June 2022 to May 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)	%
	Estate B	11,724.40	8,866.14	301,464.08	34.00	231,597.73	76.99
	Estate C	10,285.53	7,437.02	231,684.23	31.15	123,313.52	53.22
	Plasma (Division 2, 3, and 4)	5,517.69	3,549.01	45,350.81	12.78	45,350.81	100
	TOTAL	27,527.62	19,852.17	578,499.12	21.23	400,262.06	76.74
	*Production data source from 12 months before assessment (June 2022 to May 2023)						
	**There are FFB supplied to POM 3 (not yet RSPO certified)						
1.7.3	FFB description from other source						
	Name of sources/ Organisation	Type of Organisation	Number of smallholders	Production Area (ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Estate A (RSPO Certified)	PT Bio Inti Agrindo	-	4,862.85	79.20		
	TOTAL					79.20	
	*Production data source from 12 months before assessment (June 2022 to May 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 (13 Sept 2022 – 12 Sept 2023) (MT)		Last Year Actual Certified Volume (June 2022 – May 2023) (MT)	
	FFB Processed						
	CPO Production						
	Palm Kernel (PK) Production						
	*subjected to sanctions due to there is new planting after 2010 without following NPP Procedure						
1.8.2	Product selling						
	Type of selling product			Actual selling product for last year (June 2022 - May 2023) (MT)			
	CSPO sold as RSPO certified product			0			
	CSPK sold as RSPO certified product			0			
	CSPO sold under another scheme			0			
	CSPK sold under another scheme			0			
	CSPO sold as conventional			0			
	CSPK sold as conventional			0			
	*subjected to sanctions due to there is new planting after 2010 without following NPP Procedure						
1.8.3	Estimate of Certified FFB Claim						

	Name of Estates		Total Area (ha)	Production Area (ha)		FFB (tonnes/year)		Yield (tonnes/ha/year)
	Estate B		11,724.40	8,866.14		0		0
	Estate C		10,285.53	7,437.02		0		0
	Plasma (Division 2, 3, and 4)		5,517.69	3,549.01		0		0
	TOTAL		27,527.62	19,852.17		0		0
	<i>*Projected FFB production for 12 months of certificate</i> <i>*Subjected to sanctions due to there is new planting after 2010 without following NPP Procedure</i>							
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 (%)	
	POM 2	60	0	0	0	0	0	MB
	<i>*Projected CSPO and CSPK production for 12 months of certificate</i> <i>**Subjected to sanctions due to there is new planting after 2010 without following NPP Procedure</i>							
1.9	Other Certifications							
	ISPO			MUTU-ISPO/179 date on August 22, 2019 – August 21, 2024.				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	MILL	Time Bound Plan						
	POM 1	2020	Estate A	2020	District of Merauke, Province of Papua Selatan, Indonesia	Certified		
			Plasma (Division 1)	2020	District of Merauke, Province of Papua Selatan, Indonesia	Certified		
	POM 2	2020	Estate B	2020	District of Merauke, Province of Papua Selatan, Indonesia	Certified		
			Estate C	2020	District of Merauke, Province of Papua Selatan, Indonesia	Certified		
			Plasma (Division 2, 3 and 4)	2020	District of Merauke, Province of Papua Selatan, Indonesia	Certified		
Time bound plan approved on 2020								
1.10.2	Progress of Associated Smallholders and Out growers for Certifiable Standard							
	Smallholder are included in scope of certification.							

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-2	<p>1. Hasiholan Sihombing (Lead Auditor). Indonesian citizen. Bachelor of Agriculture Majoring in Agronomy, Agriculture Faculty. He has working experience for 7 (seven) years since 2009 as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The training he has followed namely: Lead Auditor ISPO in 2016, RSPO P&C Lead Auditor Course in 2018, RSPO Supply Chain Certification Lead Auditor Course in 2020, SA 8000 Awareness in 2018, Quality Management Systems (ISO 9001:2015) in 2016, Environmental Management Systems (ISO 14001:2015) in 2017, OHS General Expert in 2013, OHSAS 18001:2007 in 2017, ISO 19011:2018 in 2019, ISO 17021:2011 and ISO 17065:2012 in 2016. In this audit activity, he acted as the witnessing lead auditor. In this audit activity, an assessment is made by the Auditor team.</p> <p>2. Afiffuddin (Lead Auditor Witnessed). Indonesian Citizen, Diploma III majoring in Oil Palm Plantation, Bogor Agricultural Institute. Work experience for 5 years since 2010 in an oil palm plantation company in Indonesia as an agronomy operational staff and attended several trainings, namely: Basic Plantation Management Program, Indonesian Sustainable Palm Oil (ISPO) Auditor Training, RSPO lead auditor training, K3 General Expert, System K3 Management based on PP 50 2012 and Management System Certification (ISO 9001:2015/SNI 19011-9001:2015) ISO 17021, ISO 17065, SA 8000 training. He has been involved in several audit activities related to sustainable palm oil certification since 2016 covering aspects Best Management Practices, aspects of occupational health and safety and aspects of worker welfare. In this assessment, an assessment is made of the legal aspects of land and land disputes.</p> <p>3. Benli Manurung (Auditor) Bachelor of Agriculture, Department of Soil Science He has more than 4 years of working experience as plantation operational staff in a private oil palm plantation company in Indonesia. Trainings that have been attended include ISPO, Lead Auditor ISO 9001:2015, Awareness SA 8000, and IHT in the field of BMP. Has participated in several audit activities since 2016 in the fields of Best Management practices and employment. In this audit activity, we verified the Labor and Social aspects.</p> <p>4. Rizki Tanaya (Auditor) Indonesian Citizen, Bachelor of Agriculture, Department of Agricultural Socio-Economy, Padjadjaran University The trainings that have been attended include Training and Refreshment of the New ISPO Auditor, ISPO Ministry of Agriculture 38 of 2020, RSPO SCCS Auditor Training, RSPO P&C Lead Auditor Training, ISO 9001:2015 Lead Auditor Training, General OHS Expert Training, ISO 19011:2018, ISO 17021:2015, ISO 17065:2012, ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, ISO 50001:2018, FSC CoC, BAP, SEDEX/SMETA, and Global GAP. Has conducted several audit activities on environmental, conservation, Best Management Practices, K3, labor, and Social aspects. During this assessment, verified the aspects of Best Management Practices and OHS Aspect.</p> <p>5. Alfiany Sukmawati (Auditor) Indonesian citizens. Bachelor of Public Health, Department of Environmental Health, University of Indonesia Has worked in the field of K3 and the environment for 5 years. Has attended the AMDAL A&B training, Oshas, ISPO Lead Auditor by LPP, RSPO Lead Auditor by Checkmark, ISO 9001:2015, ISO 14001, Awareness ISO 17021, Awareness ISO 17065, Awareness ISO 9001, Awareness ISO 45001, and Awareness ISO 19011. Ebanan oil palm is sustainable with environmental aspects. In this audit activity, an assessment was made for Environmental, Social, conservation, and GHG aspects.</p> <p>The curriculum vitae (CV) of the members and the assessment team is available at PT. Mutuagung Lestari.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-2	<p>Number of auditors: 4 auditor</p> <p>Number of days for ASA-2 at site: 5 days</p> <p>Number of working days for ASA-2 at site: 20 Working days</p>
2.2.2	Assessment Process
ASA-2	The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Bio Inti Agrindo to the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The

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

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

Some opportunities for improvement of the results ASA-2 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA-3.

The opening meeting was held on 19 June 2023. As for the participants who attended the opening meeting included the General Manager, Estate and Mill Managers, Support Team from Jakarta and other staff. Closing meeting was held on 24 June 2022 attended by the same participants as the opening meeting. The management of PT Bio Inti Agrindo accept all the onsite ASA-2 audit results.

The assessment program please find Appendix 2.

2.2.3	Locations of Assessment
ASA-2	<p>The sampling location consider the issue arise from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>POM 2</p> <ul style="list-style-type: none"> • Security Post. Field observations and interviews related to labour and OSH aspects. • Weighbridge. Field observations and interviews related to employment aspects and SCCS • Dispatch Station. Field observations and interviews related to technical work, OHS aspects, employment, social, ethics, and the environment. • Sortation Station. Observations and interviews with officers sorting FFB. Based on the interview, the officer can explain the criteria FFB decent though, demonstrating how sorting FFB, employment aspect, OHS aspect and working procedures specified. • Sterilizer Station. Observations and interviews related to the processing of FFB, yield quality, losses, OSH aspects and employment. • Boiler Station. Observations and interviews related to operations, understanding of emergency response, OSH aspects and employment. • Engine room. Observations and interviews related to operations, understanding of emergency response, OSH aspects and employment. • Hydrant Simulation. Observations and interviews with officers related to emergency response procedures and the availability of infrastructure. • Workshop. Observation and interview with worker related to workshop activity, OHS, environmental and worker welfare aspect. • 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, Fuel and Oil Storage. Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect. • Sparepart and PPE Storage. Observation and interview with worker related to storage activity, OHS, environmental and worker welfare aspect. • Temporary Hazardous Waste Storage. Observation for OHS, waste disposal, and environmental aspects. • 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. • Sterilizer Station. Observations and interviews related to the processing of FFB, yield quality, losses, OSH

aspects and employment.

- **Kernel Station.** Observations and interviews related to operations, understanding of emergency response, OSH aspects and employment.
- **Boiler Station.** Observations and interviews related to operations, understanding of emergency response, OSH aspects and employment.
- **Sortation Station.** Observations and interviews with officers sorting FFB. Based on the interview, the officer can explain the criteria FFB decent though, demonstrating how sorting FFB, employment aspect, OHS aspect and working procedures specified.

B Estate

- **Fertilizer Warehouse, Division 3 and 4.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Agrochemicals Warehouse, Division 3 and 4.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Hazardous Waste Temporary Storage.** Observations and interviews with officers related to work procedures, OHS, wages and environmental management.
- **Pesticide mixing area, Division 3 and 4.** Observation related pesticide mixing area, PPE storage, safety aspect.
- **Rinse House, Division 3 and 4.** Observations related to the management of agrochemical materials and waste, MSDS, emergency response facilities and types of pesticides used.
- **Housing Area, Division 3 and 4.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, and electricity facilities.
- **Clinic.** Observations and interviews of health, environmental, training, and employment facilities.
- **Elementary School.** Observations and interviews of educational facilities, environmental, and employment.
- **Landfill Block 27-72 Divisi 3.** Observations related to domestic waste management.
- **Land Application Block 33-70.** Field observations and interviews related to OHS, environmental and workforce welfare aspects.
- **HCV Isau River Block 29-30 Division 3.** Observations regarding management of water body areas and HCV attributes.
- **HCV 6 (Sacred area) Block 18-66 Division 1.** Observations regarding management of water body areas and HCV attributes.
- **HCV Ngoh River Block 34-55 Division 4.** Observations regarding management of water body areas and HCV attributes.
- **HGU Pole No. 192, Block 28-70 Division 3.** Observation of the boundary conditions and the position of the company's legal boundaries.
- **HGU Pole No. 193, Block 28-70 Division 3.** Observation of the boundary conditions and the position of the company's legal boundaries.
- **HGU Pole No. 172, Block 19-64 Division 2.** Observation of the boundary conditions and the position of the company's legal boundaries.
- **HGU Pole No. 140, Block 19-76 Division 2.** Observation of the boundary conditions and the position of the company's legal boundaries.
- **Block 4-6 Division 1 (HGU Pole No. 8).** Observation the conditions and position of legal boundary.
- **Block 4-7 Division 1 (HGU Pole No. 9).** Observation the conditions and position of legal boundary.
- **Block 1-7 Division 2 (HCV – Mat River).** Observation of HCV management.
- **Harvesting, Blocks 4-7, Division 1.** Field observations and interviews related to technical work, OHS aspects, employment, social, and environment.
- **Land Application Block 6-25 Division 5.** Field observations and interviews related to aspects of BMP, OHS, Environment and Employment.
- **Fertilization of ZA, Block 3-14, Division 3.** Field observations and interviews related to technical work, OHS aspects, employment, social, and environment.

C Estate

- **Land Application Block 35-53.** Field observations and interviews related to OHS, environmental and workforce welfare aspects.
- **Fertilization, Block 37-45 Division 3.** Field observations and interviews related to technical work, OHS aspects, employment, social, and environment.
- **Harvest, Block 33-51 Division 1.** Field observations and interviews related to technical work, OHS aspects, employment and social.
- **EFB Loading, Block 33-51 Division 1.** Field observations and interviews related to technical work, OHS aspects, employment and social.
- **EFB Application, Block 43-54 Division 1.** Field observations and interviews related to technical work, OHS aspects, employment, social, and environment.
- **Manual circle weeding, Block 36-56 Division 2.** Field observations and interviews related to technical work, OHS aspects, employment and social.
- **Land Application Block 35-53 Division 2.** Field observations and interviews related to OHS, environmental and workforce welfare aspects.

Division II, III and IV Plasma

- **Fertilization, Block 40.33 Division 2.** Field observations and interviews related to technical work, OHS aspects, employment, social, and environment.
- **Harvest, Block 39-34 Division 3.** Field observations and interviews related to technical work, OHS aspects, employment, social, and environment.
- **Spraying, Block 42.59 Division 4.** Field observations and interviews related to technical work, OHS aspects, employment, social, and environment.
- **Housing Area Division 2.** Observation related to availability of infrastructure such as employee housing facilities, water facilities, educational facilities, religious facilities, health facilities and sports facilities
- **Agrochemical Storage** Observation and interview with worker related to chemical management, OHS, and environmental aspect.
- **Chemical, 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.
- **Hazardous Waste Transit Storage Division 1 and 4.** Observation for OHS, waste disposal, and environmental aspects.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-2	<p>Summary of stakeholder consultation process for PT Bio Inti Agrindo was held by:</p> <ul style="list-style-type: none"> • Public Notification on website MUTU Website on 7 June 2023. • Public consultation with NGOs (by email) such as WWF, WALHI, AMAN, and Sawit Watch on 12 June 2023. • Public consultation meeting with communities and previous land owners on 19 & 22 June 2023. • Public consultation by phone with government institution on 19 & 21 June 2023 • Public consultation by direct interview with internal stakeholders and contractor on 19 June 2023 <p>Numbers of input from stakeholders were clarified by PT Bio Inti Agrindo.</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit (ASA-3) will be conducted eight (9) months to twelve (12) months after date of annual license.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of POM 2 – PT Bio Inti Agrindo operation consisting of one (1) mill, two (2) own estate and one (1) scheme smallholders.

During the assessment, there were two (2) Nonconformities were assigned against Major Compliance Indicators; two (2) nonconformity were assigned against Minor Compliance Indicators; and no nonconformance against supply chain requirement for CPO mill and five (5) opportunity for improvement were identified.

Further explanation of the non-conformities raised, and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidences e.g. document record/photographic/etc. Those corrective actions taken that consist of two (2) minor raised to Major non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that POM 2 – PT Bio Inti Agroindo complied with the requirements of **Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard Endorsed by the RSPO Board of Governors on 12 November 2020.**

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1 Unit of certification showed SOP of information handling (SOP/DCO/01) validated on 20 May 2022 which explains the types of documents which are publicly accessible such as company's policies, land certificates, OHS plans, social impact plans and assessments, HCV documentation, etc. These documents can be accessed by sending a request to the management through letters, e-mail, telephone, and mailbox. Besides, UoC also provided their document publicly accessible by publishing company's policy at their website (e.g: human rights policy) and reporting their mandatory report to related stakeholders (e.g: mandatory manpower report to manpower agency).		
1.1.2 The unit of certification can show evidence that information has been received in an appropriate form and language related to stakeholder involvement, company rights and obligations that are conveyed to all relevant stakeholders, including:		
<u>Compliance with Social and Environmental Regulation</u> <ul style="list-style-type: none">PT Bio Inti Agrindo Semester I 2022 Palm Oil Plantation and Processing Mill Environmental Management Plan / Environmental Monitoring Plan Report to the Merauke Regency Environmental Service on July 18 2022.PT Bio Inti Agrindo Semester II 2022 Palm Oil Plantation and Processing Mill Environmental Management Plan / Environmental Monitoring Plan Report to the Merauke Regency Environmental Service on January 8 2023.Wastewater Utilization Report on Land in Estate B for the Fourth Quarter Period of 2022 dated January 11 2023		

- to the Environmental Service of Merauke Regency and Papua Selatan Province.
- Wastewater Utilization Report on Land in Estate B for the First Quarter of 2023 on April 5 2023 to the Environmental Service of Merauke Regency and Papua Selatan Province.
- The Hazardous Waste Management Report for the First Quarter of 2023 has been reported to the Ministry of Environment and Forestry via SIMPEL with ID: 5653 on 20 May 2023.
- PT Bio Inti Agrindo's HCV Monitoring and Management Report for the 2022 period which was reported on January 9 2023 to the Papua Province BKSDA.

Compliance with Best Management Practices and OHS Regulation:

- Forest and Land Fire Control Report for Semester II of 2022, which was submitted to the Horticultural Crops and Plantation Service of Merauke Regency on February 14, 2023.
- Quarter IV 2022 of OHS Committee Report to *UPTD* Merauke Regency Regional Labor Inspection Center on February 20, 2023.
- Quarter I 2023 of OHS Committee Report to the *UPTD* Center for Labor Inspection of the Papua Selatan Working Area of Merauke Regency on May 8, 2023.

Compliance with Legal Regulation:

- Report on the Use and Exploitation of Cultivation Rights for 2022 to the Merauke Regency Land Office and received on January 18 2023.
- Plantation Business Development Reports sent every semester, for example the report for the second semester of 2022 which was sent to the Merauke Regency Food Crops, Horticulture and Plantation Service and received on January 30 2023.
- Report on capital investment activities for the third and fourth quarter of 2022 development phase to the One Stop Integrated Service Investment Service via a manual system on January 24 2023.

Compliance with manpower Regulation:

- Mandatory Reporting of Workers reported online on March 28 2023 with reporting number 99616.20230328.0001.
- Registration of contract workers (*PKWT*) on June 09, 2023 at the Manpower Agency Merauke Regency.

Based on interviews with stakeholder representatives, for example the Environmental Forest Service and Manpower & Transmigration Service in Merauke Regency, it is known that stakeholders understand the types of information and mechanisms for requesting information from company.

1.1.3

Unit of certification showed SOP of information handling (SOP/DCO/01) validated on 20 May 2022 and work instruction of communication handling (IK/DOC/01) validated on 17 December 2019 which explained the PIC of handling information, publicly accessible documents, the flow of handling information requests, and the maximum time limit of responding to the information request which is 21 days since the date of information request received.

UoC had recorded every requested information on a logbook of incoming and outgoing letters, for example, a request for information from the Papua Selatan Province Cooperative Service number 500.3.1/150/DISKOPERINDAG-PPS/VI/2023 dated 12 June 2023 regarding a request for industrial data which was responded to on 13 June 2023 via email.

Based on the interview with villagers, they have understood mechanism of communication and consultation. Normally, headman of the village, indigenous community, and local communities would send a letter as a form of communication.

1.1.4

Unit of certification showed SOP of information handling (SOP/DCO/01) validated on 20 May 2022 which explains the types of documents which are publicly accessible such as company's policies, land certificates, OHS plans, social impact plans and assessments, HCV documentation, etc. The SOP has been socialized to stakeholders, for example socialization to contractors and workers on December 13, 2022 at POM2 which was attended by 16 participants.

1.1.5

UoC showed the current list of stakeholders which informed the internal and external stakeholders updated in June 2023. The stakeholders include the government agencies, heads of the community, cooperatives, local suppliers, contractors, gender committee, and labor union organizations. In the current list of stakeholders, it was also explained the names, agencies/positions, addresses, categories and contact person numbers.

During the assessment, auditor has verified the Stakeholder List document of the certification unit that is displayed is in accordance with the truth, such as the contact number of each stakeholder contacted by the auditor as listed in the list. Based on this, it can be concluded that the unit of certification has a well-documented contact list and detailed information regarding stakeholders and their representatives.

Status: Comply

1.2
The unit of certification commits to ethical conduct in all business operations and business transactions.
1.2.1

Unit of certification had a policy concerning on code of integrity and ethical behaviour in all operational activities and transactions. This policy stated in the Directors Decree No. BIA/DIR/01/171221 validated by the President Director on 22 December 2017. It's explained that, the group committed to apply fair business practices, prohibit all forms of corruption, bribery and fraud in the use of funds and resources, and provide business information in accordance with applicable law and acceptable industry practices.

UoC's code of ethics had been socialized to the workers, smallholder workers and contractors, for example socialization to contractors on December 13 2022 at POM2 which was attended by 16 participants.

The results of interviews with workers, contractors and interviews with village community representatives (Village Head of Selil Village, Village Head of Kindiki Village, Village Head of Mandekman Village) obtained information that the company had conducted socialization regarding the code of ethics policy.

Based on explanation above, company has policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.

1.2.2

The comprehensive system for monitoring compliance and implementation of ethical business policies and practices was carried out through the internal audit. UoC also showed the mechanism in implementing UoC's policy as stated on the agreement that the parties have to be fulfil the existing regulation such as do not employ any child labor, prohibit any corruptions and frauds, and disallowance of forced labor.

Based on the interviews with workers in mill and estate, they worked in the company wasn't through any agent or labor supplier and there were no any fees during recruitment.

UoC also showed some SOPs related to monitor the compliance and implementation of ethical business practices, here as follows:

- SOP of recruitment (SOP/HRD/01) validated on 24 March 2022 by the President Director and Collective Labor Agreement of 2021 to 2023 which stated that there was no cost in recruitment process. The company had guaranteed the cost of recruitment if there were any migrant worker.
- SOP of handling grievance and dissatisfaction (No. SOP/SOS/04) validated on 20 May 2022 which stated that the company guaranteed the freedom of speech by keeping the identity of the employee confidentially.

Based on the management review and internal audit document, there were no violation against the UoC's ethical codes.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

2.1
There is compliance with all applicable local, national and ratified international laws and regulations.
2.1.1

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

Compliance with Social and Environment Regulation:

- The company already has *Analisis Mengenai Dampak Lingkungan* Addendum Documents (*Analisis Dampak Lingkungan*, RKL, and RPL) Type B Plantation and Palm Oil Processing Mill activities with an area of 34,194.52 Ha and a factory capacity of 270 tons of FFB/hour which has received a recommendation from the AMDAL Assessment Commission of the Regency Environment Agency Merauke with Number 660/32 on July 27, 2021. In addition, the company has also obtained Environmental Feasibility in accordance with the Decree of the Head of the Investment Service and One Stop Integrated Service of Merauke Regency Number 663/03/SKKL/Year 2021 on July 29, 2021.
- Statement of the Fulfillment of the Commitment of PT Bio Inti Agrindo (POM 2) from the DPMPTSP Merauke Regency with Number 660/03/IPL-B3/XII/2020 on December 8 2020. The location coordinates of the hazardous waste storage namely S 0705'44.25324" and E 140048'27.02815".
- Estate B's Hazardous and Toxic Waste Storage Permit is in accordance with the Decree of the Head of the DPMPTSP Merauke Regency Number 06/IPL/VII/ of 2018 on July 11 2018 with a validity period of 5 years. The location coordinates for the B3 Waste TPS are 07005'07.39" South Latitude and 140047'9.26" East Longitude.
- Estate C's Hazardous and Toxic Waste Storage Permit is in accordance with the Decree of the Head of the DPMPTSP Merauke Regency Number 04/IPL/IV/ of 2018 on April 27 2018 with a validity period of 5 years. The location coordinates for the B3 Waste TPS are 07002'09.2" South Latitude and 140054'30.5" East Longitude.
- POM 2 Water Resources Business Permit is in accordance with the Decree of the Minister of Public Works and Public Housing Number 576/KPTS/M/2021 on 10 May 2021. The water intake location is on the Isau River with a maximum discharge of 27.8 liters/second or equivalent to 72,000 m3/month.
- Approval of Fulfillment of Commitment to waste water disposal permit Number 501/004/IPAL/2019 dated 27 May 2019 from the Merauke Regency Investment and One-Stop Integrated Service Office. The waste water utilization location stated in the commitment agreement is in an area of 55.68 hectares located in Blocks 7-19, 7-20, 7-23 and 7-24.

In the ASA 1 assessment carried out, the company expanded the waste water utilization area for both POM 1 and POM 2 by collaborating with consultants PT Mitra Hijau Indonesia in the preparation of technical studies and the management of *Pertek* and SLO. Currently, the Draft Technical Study on the Fulfillment of Wastewater Quality Standards (Application to Soil) has been uploaded to the One Stop Service of the Ministry of Environment and Forestry online on August 13, 2022. Until the ASA 2 assessment held, the company can show the progress of obtaining permits through the preparation of a draft of Technical Approval for Fulfillment of Wastewater Quality Standards for Utilization of Wastewater for Application to Soil and Disposal of Wastewater to Surface Water Bodies which is sent on April 4, 2023, and thereafter still in the process of improvement and finalization until now. Based on this description, the company has the opportunity to ensure that the permit is fulfilled in accordance with applicable legal obligations.

Whereas for the *Rincian Teknis (Rintek)* of Hazardous Storage, unit of certification is still waiting for a response from the Technical Unit of KLHK through Evidence of the *Bukti Acara Validasi Permohonan Layanan KLHK* which was submitted on May 29, 2023. (OFI)

Compliance with Best Management Practices and OHS Regulation:
OHS Aspect

- Has provided PPE for all employees in accordance with the risk analysis and is provided for Free
- Involve employees in health insurance and employment insurance programs (*BPJS TK and BPJS Kesehatan*)
- Equipping operators with required competencies, for example license for lift operators and power plant operators

BMP Aspect

In terms of best management practices, it is known that plantation and mill management has implemented several compliances with Indonesian laws and regulations, for example not using the burning method in the land clearing process, trees planted are from seed producers (DxP) which are recognized by the Indonesian government. Each unit of the Unit of Certification has implemented integrated pest management, biological control and only uses pesticides that are listed on the pesticide government website.

Compliance with Legal Regulation:

Plantation Business License based on the Decree of the Head of the Office of Investment and One Stop Services of the Province of Papua No. 12/SK.IUP/KS/Perubahan/2020 concerning Plantation Business Permit Changes in the Name of PT Bio Inti Agrindo issued on 27 October 2020. Based on the permit, the area of the company that received the business permit was 34,194.52 Ha and POM with a capacity of 210- ton FFB/Hour.

Compliance with Worker Welfare Aspect

- Mandatory Employment report PT Bio Inti Agrindo with reporting number 99616.20230328.0001 dated 28 March 2023.
- The implementation of the minimum wage in 2023 is in accordance with the Minimum Wage Decree of the Merauke District established by the Governor of Papua Selatan on 13 January 2023.
- Implementation of the structure and scale of wages for all levels of workers in accordance with Minister of Manpower Regulation No. 01 of 2017.

2.1.2

There is a documented system to ensure legal compliance, which is stated in the SOP for Identification of Legislative Regulations and Evaluation of Fulfillment of Applicable Legal Requirements, document number SOP/ DCO/ 06, effective date 20 May 2022, Revision 01. These procedures include explaining the following:

- Control Documents are responsible for identifying where there are changes (legislation, regulations and other provisions) related to operational activities. Sources of this information can be obtained from the following sources:
 - Book of laws or regulations
 - Industry associations for example SPSI, GAPKI, RSPO, etc
 - Seminars and conferences
 - Traditional council
 - Provincial or district government
- To ensure the up-to-date List of Related Regulations, Control Documents with Management Representatives and Managers of each section review and actively seek information about regulations every 6 (six) months and no later than once every 1 (one) year.

The company showed the 2022 Regulatory Identification and Evaluation document, which includes the latest regulations such as:

- Republic of Indonesia Government Regulation Number 22 of 2021 concerning Implementation of Environmental Protection and Management
- COVID-19 TASK FORCE Circular No. 17 of 2022 concerning Health Protocols for Overseas Travel During the 2019 Corona Virus Pandemic (COVID-19)

Regarding the evidence of evaluation of legal compliance from contractors collaborating with the company, is explained in more detail in indicator 2.2.2

2.1.3

Procedure of legal boundary stakes monitoring, and maintenance is presented in document No. SOC/KBN/25, revision 01 dated 17 March 2020. Procedure mentioned that maintenance was carried out by officer appointed by Assistant. Monitoring the boundaries of the HGU is done every 4 months.

The company shows the HGU stake monitoring document which is carried out every 4 months. The report on the inspection and maintenance of the boundary stakes has provided complete information regarding the number of stakes, the state of the stakes, the location of the stakes, the coordinates of the stakes and corrective actions as well as the

target time for repairs if there are damaged or missing stakes. In the monitoring report, it is known that all HGU stakes are available.

Based on field observations to several samples of HGU stakes determined by the auditors, namely Estate B (Stakes No. 8 and 9), it is concluded that all HGU stakes are in place according to their coordinates and are in good condition. Land boundaries with outsiders are clear, such as a large boundary road and trench that borders the HGU area. There is no indication of land use outside the HGU.

2.1.1 Status: Comply

2.2

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

2.2.1

The company shows a list of contractors updated on 10 June 2023 consisting of 3 suppliers purchasing goods, 12 building contractors, and 26 FFB, CPO/PK transporters, for example contract number 001/PTBIA/PPC/2023 dated 11 February 2023 between PT BIA and CV. MDC Bintang Bone regarding CPO Transportation from POM1 and POM2 which is valid for 2 years. The contractor list explains the contractor's operational area, PIC name, telephone number, position, PT/CV name and type of contract.

2.2.2

Based on the results of a review of the contractor list documents as of June 2023, it is known that there are 41 contractors, for example Contract number 05/BIA/SPK/2023-A dated 16 January 2023 which is valid until 01 January 2023 between PT BIA and CV. Krida Tridaya Tunggal regarding Transport of FFB in Estate C. In article 5 regarding Loading Personnel it is stated that CV. Krida Tridaya Tunggal is obliged to provide loaders as needed and data on the number of loaders is made and submitted to PT BIA. Then in article 9 related to OHS it is stated that CV. Krida Tridaya Tunggal is obliged to include its workers in employment insurance and health insurance programs.

Then the company can show proof of compliance with the regulations carried out by CV. Krida Tridaya Tunggal, for example as follows:

- List of 6 employees on behalf of HKL, STN, NFR, ASM, ARM and SGN
- Proof of payment for employee health insurance, for example proof of payment on May 16 2023
- Proof of payment for the worker's employment insurance, for example proof of payment on March 27 2023
- Proof of payment of wages, for example a wage slips for May 2023 in the name of HKL with wages amounting to IDR 5,586,179
- Driving license for all FFB transport truck drivers
- Contract CV Krida Tridaya Tunggal with employees, for example contract number 003/SPK-KD/2023 dated 01 January 2023 in the name of HKL which is valid until 01 January 2024.

However, based on the results of field visits and interviews with FFB drivers and loaders in blocks 33 – 51 Division I Estate C on behalf of HKL, RDT and PTS working at CV. Krida Tridaya Tunggal. Then RDT and PTS explained that they did not have a work agreement with CV. Krida Tridaya Tunggal.

Based on the explanation above, sufficient evidence cannot be shown that all workers in the field have an employment relationship with CV. Krida Tridaya Tunggal and participation in employment insurance and health insurance in accordance with article 5 and article 9 as stipulated in contract number 05/BIA/SPK/2023-A dated 16 January 2023.

The company has not been able to show sufficient evidence that all contractors have fulfilled their obligations to fulfill relevant regulations, including those related to employment relations and Health and Employment insurance participation. This becomes **Non-Conformity No. 2023.01 with the Minor Category.**

2.2.3

The company provides contractor evaluation monitoring for all contractors collaborating with PT BIA, for example contract number 001/PTBIA/PPC/2023 dated 11 February 2023 between PT Bio Inti Agrindo and CV. MCD Bintang

Bone regarding the transportation of CPO which is valid until April 19 2024. The contract explains the rights and obligations of both parties such as the route and number of CPO tanks, payment of taxes, prohibition of employment of minors under 18 years of age, prohibited from bringing children, no may be involved in human trafficking and forced labor as well as immoral acts, alcohol, drugs, sanctions, OHS and dispute resolution.

2.2.2 Status: Non-Conformity No. 2023.01 with the Minor Category

2.3

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

2.3.1 and 2.3.2

Based on document verification, it is known that the company only receives FFB directly and does not receive FFB indirectly, such as collectors, agents, or independent farmers. FFB processed originally from own estate (Estate A, B, and C), also certified plasma (2, 3 and 4).

Status: Comply

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

3.1

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

3.1.1

The company shows a long-term production projection contained in the 2019-2030. The document contains the projected production, CPO prices, PK, CPO and PK Revenue, cost estates, mill costs, and profitability. The long-term plan is then elaborated in the form of an annual plan, a monthly work plan in each division for each activity. Every month an evaluation is carried out on the achievement of the specified budget.

DESCRIPTION	UNIT	YEAR				
		2023	2024	2025	2026	2027
FFB Produced	Ton	662,042	694,715	716,033	727,212	731,458
CPO Production	Ton	158,890	166,731	171,847	174,530	175,549
PK Production	Ton	23,833	25,009	25,777	26,179	26,332

3.1.2

Based on interviews with management representatives and the document distribution of plant ages review, the company does not have a replanting plan in the next 5 years due to the age of the plant in the operational area of the certified unit. The oldest age of the plant in the scope of certification this time is 11 years (2012 planting year). Based on field observations in Estate A and Plasma Division 1, no replanting activities were found.

3.1.3

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

- Monthly Report Mill Manager.
- Monthly Estate Manager Report.
- Sustainability Internal Audit Report for RSPO period 2022. The audit is conducted on May 8 – 13, 2023. Based on the results of the internal audit, there is 37 non-conformity and the non-conformity has been fulfilled in April 1, 2023.
- Management Review is conducted on June 17, 2023 for PT Bio Inti Agrindo. Management review report discusses all operational activities in the company, such as the discussion of internal audit results and follow-ups from previous management reviews.

Status: Comply

3.2

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

3.2.1

The certification unit already has a system to improve existing practices, in accordance with the latest information and techniques as well as a socialization mechanism for all workers following current technological developments. The unit of certification also develops guidelines for farmers by providing systematic training for continuous improvement. Some of the evidence that has been applied for continuous improvement include:

Social and Environmental Aspect

- Management and monitoring of fires in company border areas that benefit the community.
- The 2022-2023 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.
- Social Impact Assessment Monitoring.

Best Management Practices Aspect:

- The company no longer uses pesticides with the active ingredient paraquat.
- The company has implemented biological pest control in this case by using host plants and owls to reduce the use of pesticides, especially insecticides and rodenticides.
- Management and monitoring of fires in company border areas that benefit the community.
- The use of renewable fuels and the use of fertilizers and pesticides are in accordance with the recommendations to reduce the use of fossil fuels.
- The company show the record evidence regarding internal audit of RSPO that conducted on May 8 – 13, 2023.

Compliance with Worker Welfare Aspect

- Mandatory Employment report PT Bio Inti Agrindo with reporting number 99616.20230328.0001 dated 28 March 2023.
- The implementation of the minimum wage in 2023 is in accordance with the Minimum Wage Decree of the Merauke District established by the Governor of Papua Selatan on 13 January 2023.
- Implementation of the structure and scale of wages for all levels of workers in accordance with Minister of Manpower Regulation No. 01 of 2017.

3.2.2

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

Name of RSPO Member	: PT Bio Inti Agrindo
RSPO Membership Number	: 1-0257-18-000-00
Name of Certified Unit	: PT Bio Inti Agrindo
Name of Certification Body	: PT Mutu Agung Lestari
RSPO PalmTrace ID Number	: RSPO_PO1000010735
Number of Mills	: 1
Number of Estates	: 3
Production Area (ha) - Estate	: 19852
Certified Area (ha) - Estate	: 27528
High Conservation Value (HCV) Area (ha)	: 6387
Additional set aside river buffer (ha) that are not part of the above HCV areas.	: 0
Peatlands - Planted (ha)	: N/A
Peatlands - Unplanted (ha)	: N/A
Freshwater Usage per PO produced tonne	: 12.18

Average LTIFR : 23.86
Total Workers : 107

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 unit certification has BMP SOPs for both estates and mills that have not changed from the previous audit. The procedure describes key processes such as harvesting, transportation, fertilization, HDI, GAP, supply chain requirements for mills, processing at mills, and delivery of CPO and PK. Examples of SOP document numbers owned by a company are as follows:

- SOP for Land Opening and Preparation (Code: SOP/KBN/01) dated 24 December 2017 Revision 00.
- Nursery SOP with Code: SOP / KBN / 02 effective date 24 December 2017 Revision 00
- Planting SOP (Code: SOP/KBN/04) dated 24 December 2017 Revision 00.
- SOP for receiving and checking / sorting FFB activities (Code: SOP/POM/04) dated 24 December 2017 Revision 00.
- Processing SOP (Code: SOP/POM /05) December 24, 2017.
- And others.

That SOP's is available on audit site (Estate and Mill office) and written in a language that is easily understandable for workers (written in Bahasa). The entire procedure both of plantation and mill has been included of safe working instruction, other than those described in the HIRAC document.

The procedure that is owned by the company has covered all the main process activities from land clearing up to transporting FFB and for POM starting from receiving fruit to dispatch CPO.

Based on field visits and interviews with spray workers in Plasma Division 4, it is known that workers understand the procedures related to spraying activities such as not spraying near water bodies and not spraying downwind and harvesting activities also on processing station POM 2, it is known that workers already know the procedures and criteria for harvesting and processing in Mill and have used PPE in accordance with the established HIRAC document.

3.3.2 and 3.3.3

To ensure consistency of procedures implementation, the company has a monitoring inspection mechanism that was carried out regularly through internal audit activities. An internal audit conducted company conducts evaluations every year to monitor updates related to procedures where if there are significant things, for example based on the results of internal operational audits, internal audits of ISPO and RSPO. There are several types of audits that are conducted routinely by the company. For example:

- Sustainability Internal Audit Report for RSPO period 2022. The audit is conducted on May 8 – 13, 2023. Based on the results of the internal audit, there is 37 non-conformity and the non-conformity has been fulfilled in April 1, 2023.
- Management Review is conducted on June 17, 2023 for PT Bio Inti Agrindo. Management review report discusses all operational activities in the company, such as the discussion of internal audit results and follow-ups from previous management reviews. Harvest inspection activities to maintain harvest quality, namely for indicators of loose fruit, OHS, and pruning (under / over).
- Inspection activities for detection and census of EWS for all unit, including Plasma Estate.

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

Unit management also monitors contractor performance regarding compliance with unit management procedures by periodically monitoring compliance with company regulations and work procedures when collaborating with contractors. Based on the results of interviews with management, field observations, and interviews with contractors and verification document of Sustainability Internal Audit Report, it is known that the internal control carried out by the company on the contractor's performance on the implementation of SOPs is carried out by conducting field inspections directly.

Status: Comply

3.4

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

3.4.1

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

POM 2 and Estate B, C including Plasma

- *AMDAL* documents (*AMDAL*, *RKL*, and *RPL*) for the construction of PT Bio Inti Agrindo Palm Oil Plantation and Processing Factory in Merauke Regency, Papua Province with an area of 39,900 ha and a factory capacity of 120 tons of FFB/hour. The document was approved based on the Decree of the Head of the Environmental Impact Management Agency for Mining and Energy Merauke Regency No. 660/26/2008 was stipulated on August 4, 2008. The company also has an Environmental Feasibility Permit for the Development and Plantation and Palm Oil Processing Factory obtained through Merauke Regent Decree No. 660/26/2008. 88 of 2009.
- In 2018, the company carried out an *AMDAL* Addendum due to plans to increase the number and capacity of factories in Estate B (POM 2) with a capacity of 60 tons of FFB/hour and Estate C (POM 3) with a capacity of 90 tons of FFB/hour in Ulilin District, Merauke Regency, Papua Province. The document has obtained an environmental permit in accordance with the Decree of the Merauke Regency Investment and One Stop Service Office Number 663/05/ 2018 on December 5, 2018.
- In 2021, the company made an *AMDAL* addendum due to the addition of factory capacity in Estate B (POM 2) from 60 Ton FFB/Hour to 90 Ton FFB/Hour, in Estate C (POM 3) from 90 Ton FFB/Hour to 120 Ton FFB/hour, and the addition of several activities that have not been covered in the previous *AMDAL* document, namely increasing the area for wastewater application, increasing the number of WWTP pools, Utilizing solid waste in the form of EFB, Management of hazardous and toxic waste from health service facilities, increasing domestic wastewater treatment, installation of solar cells, and utilization of methane gas from the WWTP pool for biogas fuel. The documents are Addendum *AMDAL* Type B Plantation activities and Palm Oil Processing Factory with an area of 34,194.52 hectares and a factory capacity of 270 tons of FFB/hour (POM 1 capacity of 60 tons of FFB/hour, POM 2 capacity of 90 tons of FFB/hour, and POM 3 capacity 120 Ton FFB/Hour). The document has received a recommendation from the *AMDAL* Assessment Commission of the Merauke Regency Environmental Service Number 660/32 on 27 July 2021. In addition, the company has also obtained Environmental Feasibility in accordance with the Decree of the Head of the Investment and Public Service Agency.

Social Aspect

The company already has a Social Impact Assessment Report (SIA) of PT. Bio Inti Agrindo conducted in January 2017 to February 2017 conducted by Aksenta. The scope of the study was carried out in and around the operational area of BIA and its partnership plantations, covering areas of villages in and around the plantation as well as plantations, mills, HGU areas or plantation/company permits covering Merauke Regency, Ulilin District.

During the last three years (2017 to 2019) the Social Impact Assessment document issued by Aksenta was used as the basis for planning and managing existing social impacts. In year 3, at the end of 2019, the company's management evaluated the results of the social impact study conducted by Aksenta. Based on the results of the evaluation of the company's management that along with the development of the era and the opening of access for the community with the presence of the company, it is necessary to re-study existing social impacts, so that from January to May 2020 the company conducts a social impact study by an independent assessment team, namely Ecology Consultant. From the results of the Social Impact Study conducted by Ekologika Consultant, several positive and negative impacts emerged, from the existing negative impacts it resulted in negative impacts that had a high risk of making the community vulnerable. Further recommendations for managing existing impacts, both positive and negative, have also been included in the results of the social impact assessment. Social impact assessment is carried out using the Participatory Rapid Rural Assessment (PRRA) method, namely by taking an approach by positioning the community as subjects who know the conditions and problems in their area, providing "space" to people from various social statuses and interests to express their aspirations. is a medium of learning and community empowerment about conditions and problems in their area.

Based on document verification, it is known that the social and environmental impact assessment has been carried out independently and participatively by involving affected stakeholders, including impact assessments from smallholder schemes.

The results of field observations during the audit activity show that all of the company's operational activities have been included in the company's environmental documents.

Based on interviews with surrounding villages, namely Selil and Mandekman, it is known that the social impacts of the company's existence include partnerships with business actors to provide business opportunities to the community, CSR, job opportunities, etc. These social impacts have also been identified in the SIA Document, Environmental Document, as well as the company's social impact management plan.

Based on document verification, it is known that the scope of the social impact assessment has covered all villages, farmers, and has involved internal workers.

3.4.2

The company has a plan for environmental and social management and monitoring, namely:

Environmental Aspect

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.

The environmental management and monitoring plan is in accordance with the 2009, 2018 and 2021 *AMDAL* documents, namely:

AMDAL 2021

Plant Operation Stage A

- Soil erosion
- Decline in surface water quality
- Changes in flora and fauna
- Public perception and positive attitude
- Changes in disease pattern

Plant Operation Stage B

- Decreasing air quality
- Noise enhancement

- Occurrence of odor
- Liquid waste generation
- Decline in surface water quality
- Disturbance of Aquatic Biota
- Decreasing Environmental Sanitation
- The emergence of negative public perceptions and attitudes

FFB, CPO and Kernel Transportation

- Air Quality Decline
- Changes in disease pattern

AMDAL 2018

- Monitoring the rate of soil erosion.
- Air quality and noise monitoring.
- Hazardous Waste Management.
- Monitoring Social, economic and cultural components.
- Monitoring the quality of surface water (well and river water).
- Application of effluent to the ground.
- Biological component (monitoring of flora and fauna).
- Social component (public perception).
- Community plantations (plasma).

AMDAL 2009

- Erosion/sedimentation
- Water quality
- Vegetation Structure
- Wildlife protected
- Social unrest
- Public health

The environmental management report is carried out every 6 months and submitted to the relevant agency, for example;

- Proof of reporting the *RKL-RPL* for PT Bio Inti Agrindo's Palm Oil Plantation and Processing Factory Semester I 2022 to the Merauke Regency Environmental Service on July 18 2022.
- Proof of reporting the *RKL-RPL* for PT Bio Inti Agrindo's Palm Oil Plantation and Processing Factory Semester II 2022 to the Merauke Regency Environmental Service on January 8 2023.
- Evidence of electronic reporting via *SIMPEL RKL-RPL* documents for PT Bio Inti Agrindo's Palm Oil Plantation and Processing Factory for the second semester period of 2022 dated March 27 2023

Social Aspect

PT Bio Inti Agrindo has a social impact study and reviews the implementation of social management and monitoring which has been regularly reviewed and updated, namely through the 2023 Social Impact Mitigation Activity Implementation Report (January – May), evidence of its participation in the community, for example; Kindiki Village, Selil Village, Mahuze Kewam and Mahuze Milafo Clans.

Based on the results of the document review review, the following programs have been managed by the company:

- Strengthening communication and social relations with the clans that own the customary land and the communities around the company.
- Company participation in improving human resources within the Company in collaboration with third parties.
- Recruitment and management of local workforce.
- Development of CSR programs to help improve the economic independence of the community.
- Development of a CSR program to participate in improving basic facilities for clans owning customary land, which provides convenience for companies and communities.
- Community plantation development.
- Local economic development.
- Improving the quality of education.

- Counseling and improving the quality of public health.

However, based on the results of a review of the SIA management documents, not all issues and affected stakeholders are contained in the document. For example, based on the results of interviews with the gender committee and housing residents in estate A, it is known that there are several social issues that are developing, related to:

- There have been 5 cases of sexual harassment from 2018 – 2023
- There are complaints about the existence of wild pigs being released wild in residential areas, which has an impact on the management of domestic waste and damaged ornamental plants.

Based on this explanation, the company has not been able to show evidence that a review of social impact management has been carried out in a participatory manner from all affected stakeholders, for example but not limited to migrants and contractors, broader representation of workers such as local workers, gender committees, smallholder, and trade unions so that it is still there are issues that have not been documented. This is becomes **Non-Conformity No. 2023.02 with the Minor Category.**

3.4.3

The Company has implemented environmental and social management and monitoring plans, namely:

Environmental Aspect

The company has documents, the implementation of the results of the environmental permit including reports to agencies in the form of RKL-RPL documents which are conducted every semester and reported to related agency (explain in indicator 3.4.2).

The effectiveness of environmental management and monitoring can be seen from the results of environmental management and monitoring analysis, which can also be seen from the suitability between the management and monitoring plans and their implementation in the field. The RKL-RPL document also shows that the company has managed all the critical impacts recommended in Environmental permits. Include impact analysis by trend evaluation, critical level evaluation and compliance evaluation.

From field observation found that environmental management in accordance with the RKL-RPL for example by carrying out filter maintenance on chimneys, installing signs prohibiting chemical applications on riverbanks, providing PPE in areas that have the potential to be exposed to high noise, and prohibiting hunting as a form of conservation of RTE species.

Social Aspect

The company has managed and monitored social impacts in accordance with what has been stated in the The Social Impact Management Plan around the PT Bio Inti Agrindo 2023 company area. In general, social impact management activities have been carried out with the aim of reducing the identified negative impacts, through activities;

- Strengthening communication and social relations with the clans that own the customary land and the communities around the company.
- Company participation in improving human resources within the company
- Recruitment and management of local workforce
- Development of CSR programs to help improve the economic independence of the community
- Development of a CSR program to participate in improving basic facilities for clans owning customary land
- Development of community plasma

This impact management activity also involves stakeholders, that is the community by taking into account the aspirations or inputs of the surrounding villages. Community involvement in social management and monitoring meeting has been done, for example are;

- CSR Work Plan Preparation activity held on November 14 2022, was attended by 5 members of the Mahuze clan, 6 members of the Basik-Basik clan, 4 members of the Warwenop clan, 3 representatives of the Loo Maju Bersama cooperative, 1 plasma partner, and 1 member Kaize clan.
- Planning and Development Meeting (MUSREMBANG) program in 2023 on 17 February in the Uilil district which

was attended by 38 participants.

Based on public consultations with village heads in Kinidiki Village, Selil Village, and Mandekman Village, information was obtained that the company has made efforts to develop the surrounding community through CSR programs, recruitment of local workers, local contractors, etc. In addition, it is known that so far, the relationship between the company and the community has been going well.

3.4.2	Status: Non-Conformity No. 2023.02 with the Minor Category
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3.5

A system for managing human resources is in place.

3.5.1

UoC had procedures related to recruitment, appraisal, promotion, remuneration, and termination of employment which are generally described in the Collective Labor Agreement period of 2021 to 2023 written in *Bahasa*. This CLA has been validated by the head of manpower agency of Merauke District.

Based on the document verification, CLA generally described these procedures as follows:

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

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

- Procedure No. SOP/HRD/01 validated on 24 March 2022 concerning on Recruitment and Selection.
- Procedure No. SOP/HRD/05 validated on 24 March 2022 concerning on Worker's Appraisal.

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.

The company can show employee acceptance documents, for example a letter of acceptance for employment on behalf of KNO (harvester) Division II Estate C. MCU results on January 7 2023 with results declared Healthy. Contract on behalf of KNO (harvester) number BPHNL/SPK/KT-230109-A dated 09 January 2023 concerning a 3 month trial period contract for Division II Estate C harvesters. Performance assessment document with a final score of 4.3 out of 5. Statement letter number BPHNL/SPK-P/220410- B dated April 10 2023 regarding the appointment of KNO as a permanent employee as of April 10 2023.

3.5.2

Unit of Certification documented all labor procedures that have been carried out properly, such as recruitment, promotion, performance appraisal, and termination. The following are some sample labor procedures that have been implemented and are well documented by certification unit, including:

- 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), the result of medical checkup, and work agreement letter. For example, Contract on behalf of KNO (harvester) number BPHNL/SPK/KT-230109-A dated 09 January 2023 concerning a 3 month trial period contract for Division II Estate C harvesters.
- Performance assessment document with a final score of 4.3 out of 5.
- Statement letter number BPHNL/SPK-P/220410- B dated April 10 2023 regarding the appointment of KNO as a

permanent employee as of April 10 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 the OHS Policy, which is stated in the Directors' Decree document, Document number BIA/DIR/28/220505, effective date May 5, 2022, and approved by the President and Director. In summary, it is known that the OHS policy has covered matters such as the Planning and Implementation of the OHS Policy, Monitoring the Implementation of the OHS policy, Handling Emergencies and work accidents, and others.

In addition, there are also OHS procedures, one of which is explained in SOP/HSE/04 on Emergency Preparedness and Handling Revision 00 (December 24, 2017). Furthermore, the certification unit also has a HIRAC document prepared by the PT Bio Inti Agrindo team which was approved by the management leader on June, 2023 which informs the identification of hazards (work activities, sources of danger, risks/impacts); risk analysis (current risk control, frequency, severity/consequence, risk level), and risk control (actions to reduce risk and responsibility (date/status). For information that Plasma Estate is fully managed operationally. Therefore, all activities including OHS aspects follow the PT Bio Inti Agrindo program.

The document has discussed hazard identification, risk analysis, and risk control in every factory and estate operational activity such as crop maintenance (pesticide spraying, fertilizer application, empty bunch application, stem pruning, etc.), harvesting activities (including around the electricity supply), transportation of FFB, and General Activities (warehouses, workshops, employee transportation, employee housing, garbage disposal, generator sets & water pumps, and security personnel). However, there are still activities where hazard and risk identification has not been carried out, such as HCV Area Monitoring Activities. This is an opportunity for improvement for the company to ensure that all work activities/activities in the plantation and mill have identified the hazards and risks in the HIRAC document.

OFI

The certification unit shows the program and realization of OHS implementation including the following:

- OHS program includes: Training - OHS technical training, environment, and Manpower; Use of PPE (PPE List, Record of PPE Expenditure, Record of PPE Violation); OHS Committee meetings every month; Medical Checkup; Emergency response; Provision of First Aid Box; Provision of light fire extinguisher; Internal OHS Audit; Risk analysis; Work accident recap and evaluation
- The application of OHS by the certification unit for example is shown by
 - OHS Socialization and Training: Routine socialization regarding OHS application that is delivered during the morning briefing of employees at least once a month; Examination of the completeness of PPE before work for plantation and mill employees carried out by each foreman; Warning regarding OHS, such as the obligation to use PPE, type of PPE, and hazard risk analysis installed in strategic areas.
 - Medical Checkup for Employee (further explained in indicator 7.2.10).

Reporting

- OHS Committee report Estate and Mills period Quarter IV of 2022, to the Merauke Regency Regional Labor Inspection Center Technical Implementation Unit, dated February 20, 2023.
- OHS Committee report Estate and Mills period Quarter I of 2023, to Merauke Regency Regional Labor Inspection Center Technical Implementation Unit, dated May 8, 2023.

3.6.2

The company carries out activities to monitor the effectiveness of the OHS plan such as:

- Regular monthly meetings for each OHS Committee in each unit in the context of the effectiveness of the OHS plan that has been prepared in the beginning of the year.
- The company simulates land fires per semester.

- Hold a First Aid Simulation for each management unit.
- Examination of fire extinguishers every month in preparation for the existence of hotspots in each unit.
- Providing PPE and its replacements to all employees for free.
- PPE checking every morning by supervisor in each unit.

OHS Committee meetings have been held regularly every month with discussions of OHS issues and their follow-ups. For example, the P2K3 meeting on February 17, 2023, included discussions including:

- Ordering and repair procedures and others for Safety Line approval are still the same, and HSE is required to attach comments according to the GL (General Ledger) Account for new safety.
- Special MCU inspections from each estate will be recorded and summarized based on the inspection results for employees that need to be followed up and then sent to the Sustainability team.
- POSCO HSE audits.
- ISO 45001:2018 External Audit Progress (Occupational Health and Safety Management System).

Status: Comply

3.7

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

3.7.1 and 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, smallholders, and contractors. The training programs such as: harvest management, fertilization, spraying management, welder training, HIRADC training, Industrial Relations training, SIA training, Electrical Technician training, IPM 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:

- Leadership Training in March 2023 which was attended by 52 participants
- First aid officer training in March 2023, attended by 32 participants
- ISO 45001 Auditor Training in January 2023 which was attended by 1 person
- ISO 9001 Auditor Training in January 2023 which was attended by 1 person
- Boiler operator training in June 2023 which was attended by 5 people
- Etc.

3.7.3

Adequate training is provided for personnel who perform tasks essential to the effective implementation of SCCS, including:

- RSPO SCC Standards Online Training, 11 – 12 August 2022, attended by 10 participants.
- Contractors' SCCS System Socialization Report at POM 1, November 27 2022, which was attended by POM 2 CPO contractors.

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.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 and 3.8.2

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

3.8.3

Due to sanction, the production of FFB, CPO and PK cannot be claim as RSPO product.

3.8.4

The Mill has registered as RSPO member under PT Bio Inti Agrindo (No. 1-0257-18-000-00) and also has been registered in IT platform palm trace RSPO <https://palmtrace.rspo.org/web/rspo/member-directory> which information as follows:

- Member Name: PT.Bio Inti Agrindo_PKS 2
- License ID: CB141973
- Core Product: Palm Oil
- Member ID: RSPO_PO1000010731
- Type of Business: Oil Mill

3.8.5

The Mill has had procedures related to the supply chain, such as RSPO Supply Chain SOP with document number SOP / PKS / 14 effective date 26 September 2020 revision 00. These procedures have been referred to the latest RSPO Supply Chain System. The procedure has covered all aspects in SCCS MB model, such as receiving and recording that identify the traceability of RSPO certified and uncertified source and products, FFB processing, the announcement in RSPO Palmtrace, key persons such as security, weight bridge clerk, dispatch/kernel officer, production clerk, Administration Head, as well as the training.

Unit management shows the procedure for Purchasing and Selling of FFB / CPO / PK with document number SOP / PKS / 13, effective date of September 25, 2020 revision of 00. SOP for purchasing and selling FFB / CPO / PK is prepared to regulate the entire process of buying and selling of Fresh Fruit Bunches (FFB), Crude Palm Oil (CPO), Palm Kernel (PK), so that it can run effectively and efficiently. As well as being a guideline and uniform implementation of the process of buying and selling FFB, CPO, PK.

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

3.8.6

The procedure for internal audit for SCCS mentioned in the procedure of Quality Audit Procedure (No. SOP / DCO / 07 effective date May 30 2020). Based on that procedure internal audit is carried out minimum one times a year. Based on document review, the company show the record evidence regarding internal audit of RSPO SCCS that conducted on May 8 – 13, 2023.

Management Review of RSPO SCCS implementation conducted on June 17, 2023. The management review discussion has covered the input from internal audit result, correction and corrective action, process Performa and product compliance, follow up of previous management review, and recommendation for improvement.

3.8.7

Due to sanction, the production of FFB, CPO and PK cannot be claim as RSPO product.

3.8.8

Due to sanction, the production of FFB, CPO and PK cannot be claim as RSPO product.

3.8.9, 3.8.10 and 3.8.11

There are no sales of CSPO and CSPK since the mill obtained the RSPO certificate. The unit of certification has legal ownership of CPO and PK and did not outsource its milling activities. Vehicles and bulking owned by PT Bio Inti Agrindo.

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 sales contract, delivery order/invoice, production report and product sales. Based on document verification on supply chain procedure, retention time for all records and report

regarding to supply chain are kept for 2 years.

There are no sales of CSPO and CSPK since the mill obtained the RSPO certificate. Due to sanction, the production of FFB, CPO and PK cannot be claim as RSPO product by POM 2 PT BIA.

3.8.13 and 3.8.14

The conversion rate of production of CPO (OER) and PK (KER) were based on actual daily, monthly and yearly production. The extraction rate follows the actual data for a 12-month period for June 2022 until May 2023 i.e OER 23.40% and KER 3.44%. Periodically update of extraction is actual extraction.

3.8.15

SCSS module used in POM 2 is Mass Balance (MB), because the mill receives FFB from the estate RSPO certified and from third party that non-certified RSPO.

3.8.16 and 3.8.17

There are no sales of CSPO and CSPK since the mill obtained the RSPO certificate. Due to sanction, the production of FFB, CPO and PK cannot be claim as RSPO product by POM 2 PT BIA.

	Status: Comply	
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PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

UoC showed their commitment due to respecting human rights stated in the stated in the Directors Decree No. BIA/DIE/27/190225 concerning Human Rights Policy validated by the President Director on 25 February 2020. This policy explained that PT. Bio Inti Agrindo committed to respect and protect human rights and avoiding the disallowance of human rights, protecting the human rights defender or complainant of human rights' abuse.

UoC's commitment in respecting the human rights has been well implemented proved by the absence of issues and incidents of human rights violations that occurred in the operational areas for mill and 2 estates. Based on the interview with workers in estates (harvesters, pesticide sprayers, and maintenance workers), workers in mill (mill operators and warehouse workers), they stated that there were no incidents or issues of human rights violations occurring in the operational area of the certification unit. UoC also had respecting the rights of human right defenders and prohibiting the retaliation towards human right defenders.

4.1.2

Based on the interviews with representatives of workers, 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.

The Official National Soldier who had been placed by the government only for securing borders and areas of vital objects in the Merauke region based on decree No. Sprin/39/VIII/2019. The unit of certification was indirectly hires and employ the national soldier. Based on interview with worker at Estate A, there were no issues related to violence perpetrated by mercenaries from PT BIA.

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	
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4.2

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

4.2.1

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

- SOP No. SOP/HRD/08 validated on 24 March 2022 concerning in handling workers grievances. The policy explained activities of handling grievances related to manpower or non-manpower (e.g: facilities, etc).
- SOP No. SOP/SOS/04 validated on 20 May 2022 concerning in handling grievance and dissatisfaction. The policy explained the mechanism of external communication (e.g: contractors, suppliers, government agency, etc) including the mechanism if there were any grievances. This policy also explained that the company can be brought the complaints to the RSPO complaint system if there wasn't any solution yet and protected the identity of the whistleblower if needed.

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

4.2.2

Unit of certification showed SOP No. SOP/SOS/04 validated on 20 May 2022 concerning in handling grievance and dissatisfaction. In the general mechanism of handling grievance, is stated as follows:

- The company's commitment to protect the anonymity of whistleblowers.
- Submission verbally or in writing to the contact person of the company or through labor union.
- Responses will be given at a maximum of 21 days.

Based on 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; 4.2.3

Based on interviews with workers and external or internal stakeholders, it's known that they have understood the person responsible and the grievance mechanism in which the complainant's identity is protected.

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

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 and several village event (e.g *Musrembang*) 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, in the 2023 CSR Work Plan Preparation activity held on November 14 2022, was attended by 5 members of the Mahuze clan, 6 members of the Basik-Basik clan, 4 members

of the Warwenop clan, 3 representatives of the Loo Maju Bersama cooperative, 1 plasma partner, and 1 member Kaize clan.

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

- Social and Economic: providing incentives to Community leaders and the elderly, totaling IDR 458,805,000,- and condolence donation
- Education: distribution of educational scholarships with a total number of recipients of 95 people from the Basik-Basik, Omba, Warenop, Milafo, Kewam and Kaize clans as well as uniform assistance for school children
- Health: food aid (in the form of rice) which has been realized with a total of 28.7 tons and free medical treatment, immunizations, vaccinations, blood donations, and POSYANDU.
- Religion and Culture:
- Etc.

The company has a 2023 program listed in the *Risalah Kerja Tahunan 2023* with a budget of IDR 1,909,005,000,- some examples of programs include;

- Social and Economic: fishing equipment, cattle, seeds (areca (*pinang*), *rambutan*, and *durian*), craft production houses, clan's contractors, and assistance
- Education: community education costs
- Health: community referral treatment
- Religion and Culture: church renovation to the Kampung Kindiki, Construction of the Simpang Muting Holy Cross Park, parcel costs for Christmas 2022
- Etc.

The results of interviews with representatives of the surrounding community 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

The total scope area of certification is **27,527.62 Ha**, with the details of legal document as follow:

The company has had land title (HGU) as follows:

- HGU certificate No. 11, dated 18 November 2013, valid thru 18 November 2043 for 1,351.15 Ha (Core Estate)
- HGU certificate No. 12, dated 18 November 2013, valid thru 18 November 2043 for 17,121.93 Ha (Core Estate)
- HGU certificate No. 13, dated 18 November 2013, valid thru 18 November 2043 for 3,536.84 Ha (Core Estate)
- HGU certificate No. 00053, dated 7 July 2021, valid thru 18 November 2043 for 1,119.01 Ha (Plasma Estate)
- HGU certificate No. 00054, dated 7 July 2021, valid thru 18 November 2043 for 3,920.80 Ha (Plasma Estate)
- HGU certificate No. 00055, dated 7 July 2021, valid thru 18 November 2043 for 477.89 Ha (Plasma Estate).

4.4.2, 4.4.3, 4.4.4 and 4.4.5

PT Bio Inti Agrindo has acquired land within the location permit area from the rights and interests of other parties, which are briefly explained as follows:

- The company has acquired land for the managed area of 34,194.52 Ha from the rights and interests of other parties. This is stated in the explanation of the Minutes of the Examination Committee of the Land B Committee of Papua Province No. 42A/KEP-91/V/2011 dated May 23, 2011 for an area of 6,666.9 Ha and No. 305/300-91/III/2013 dated March 19, 2013 which states that:
 - The land being applied for is state land originating from the release of part of the production forest area which can be converted based on the Decree of the Minister of Forestry of the Republic of Indonesia dated September 28, 2009 No. SK.572/Menhut-II/2009 on a land area of 36,400.90 Ha.
 - The land requested is obtained from the release of customary land that has been released with compensation

given by PT BIA.

- The land being applied for does not have any objections or problems with the indigenous peoples as the owners of the customary land parcels and with the surrounding community.
- Exemption from the interests of customary rights, based on the HGU Certificate owned, it is known that the HGU area of PT BIA consists of 2 expanses of land, namely Block 1 (Estate A / HGU Certificate No. 1) and Block II (Estate B and C / HGU Certificate No. 11, 12 and 13). The two areas are separated by the Bian River which flows from north to south and the Trans Papua road that connects every district in the Papua Province Region. The results of document verification and interviews with customary owners revealed that Block 1 belongs to the Basik – Basik (Basik Mil) and Mahuze Besar clans from the Marind Tribe and the Renggam clan (Basik – Basik sub clan), Genbenop (Basik – Basik sub clan), and Warenop (sub clan Mahuze Besar) from the Mandobo Tribe. Block 2 is customary land owned by the Mahuze Milafo and Mahuze Kewam clans from the Marind Tribe in Indonesia and belongs to the Kaula, Basikuen, Gakuen, Rekuen and Ngasikuin clans from the Marind Tribe in Papua New Guinea. The results of document verification and interviews with management and representatives of indigenous peoples show that the company can show documentation of handing over customary land for plantation development.

As explained above which states that PT BIA is separated in two (2) stretches and the two areas are separated by the Bian River which flows from north to south and the Trans Papua road which connects every district in the Papua Province Region. In this regard, the company can show records of land acquisition, for example:

- Statement and Agreement Letter for Construction and Use of Access Road from PT BIA in Ulilin District By Marga Mahuze on March 9, 2012.
- A statement on the release of customary land rights of the Omba clan in Asiki Village, Jair District, Boven Digoel Regency, dated May 30, 2011 which was signed by both parties, the Head of the Village, Military District Commander of Jair District, the Head of Jair District and the Head of the Jair Police Sector.
- Statement Letter of Release of Customary Land for Construction of Access Road from Port to PT BIA Oil Palm Plantation Location by Marga Ekoki in Asiki Village, Jair District, Boven Digoel Regency On November 14, 2011 signed by both parties, the Village Head, Military District Commander Jair District, Head of Jair District and Jair Police Chief.
- Statement Letter of Release of Customary Land for Construction of Access Road from Port to PT BIA Oil Palm Plantation Location by Marga Omba Quimanop in Asiki Village, Jair District, Boven Digoel Regency On November 14, 2011 which was signed by both parties, the Village Head, Military District Commander, Jair District, Head of Jair District and Head of Jair Sector Police.
- Statement Letter of Release of Customary Land for Construction of Access Road from Port to PT BIA Oil Palm Plantation Location by Marga Gue in Asiki Village, Jair District, Boven Digoel Regency On November 14, 2011 signed by both parties, the Village Head, Military District Commander Jair District, Head Jair District and Jair Police Chief.

Based on interviews with 6 previous land owners or customary rights owners from the Mahuze Milafo and Mahuze Kewam clans, information was obtained that before the oil palm plantation land was opened, the company had held a meeting to the Tua Marga and members of the Clans in a participatory manner who explained that the area on the customary land to be released would be planted with oil palm and the Tua Marga as representatives of the Clans who owned the customary land agreed to this and without any coercion from any party.

4.4.6

Based on the results of interviews head of Kindiki Village, Mandekman Village and Selil Village and Mahuze Milafo and Mahuze Kewam clans as well as previous landowner obtained information if all compensation process has been held with transparent regarding to mutual agreement. Whole area that managed by the company has been compensated. Until the audit was carried out, there was no written complaint from the community regarding the land dispute. Furthermore based on public consultation it was known the implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties in line with social impact assessment reviews. However, this is a non conformity in indicator 3.4.2.

Status: Comply

4.5

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

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

There is new planting after 1 January 2010 without NPP and this become object of sanction for 3 years after obtaining the RSPO Certificate. The compensation process has been finished in 2015 and not diminishing the legal/customary right and the land acquisition been through without coercion. Based on interviews with 6 previous land owners or customary rights owners from the Mahuze Milafo and Mahuze Kewam clans and also as a Kindiki, Mandekman and Selil village community, known that the land has been compensated and there is no claim/ dispute land between community and the company.

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

The company has procedure of Land Compensation, document No. SOP/SOS/01 dated 24 December 2017 related to identifying legal, customary or user rights, and for identifying people entitled to compensation. Based on interviews with 6 previous land owners or customary rights owners from the Mahuze Milafo and Mahuze Kewam clans and also as a Kindiki, Mandekman and Selil village community known that they know about the procedure through the socialization given and they agree with the procedure.

4.6.2

The company has procedure of Land Compensation, document No. SOP/SOS/01 dated 24 December 2017. The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on interviews with 6 previous land owners or customary rights owners from the Mahuze Milafo and Mahuze Kewam clans and also as a Kindiki, Mandekman and Selil village community known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the land owner and landowners are given the freedom to release their land without coercion.

4.6.3

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

4.6.4

Based on the results of interviews with previous land owner, information is obtained that he has received compensation for the land he has claimed and all the files for the settlement process are also kept by the person concerned. All land claim settlement processes, from identification, negotiation to compensation, are carried out through the agreement of the parties without any coercion or pressure from other parties.

Exemption from the interests of customary rights, based on the HGU Certificate owned, it is known that the HGU area of PT BIA consists of 2 expanses of land, namely Block 1 (Estate A / HGU Certificate No. 1) and Block II (Estate B and C / HGU Certificate No. 11, 12 and 13). The two areas are separated by the Bian River which flows from north to south and the Trans Papua road that connects every district in the Papua Province Region. The results of document verification and interviews with customary owners revealed that Block 1 belongs to the Basik – Basik (Basik Mil) and Mahuze Besar clans from the Marind Tribe and the Renggam clan (Basik – Basik sub clan), Genbenop (Basik – Basik sub clan), and Warenop (sub clan Mahuze Besar) from the Mandobo Tribe. Block 2 is customary land owned by the Mahuze Milafo and Mahuze Kewam clans from the Marind Tribe in Indonesia and belongs to the Kaula, Basikuen,

Gakuen, Rekuen and Ngasikuin clans from the Marind Tribe in Papua New Guinea. The results of document verification and interviews with management and representatives of indigenous peoples show that the company can show documentation of handing over customary land for plantation development.

Based on interviews with 6 previous land owners or customary rights owners from the Mahuze Milafo and Mahuze Kewam clans, known that all land acquisition between local people and company representatives conducted as mutual agreement and with Bahasa that understood by all parties involved. The compensation process is done directed to the land owner and not diminish the legal/customary right; landowners are given the freedom to release their land without coercion.

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

The company has a procedure in place to identify people and/or community groups entitled to compensation presented in document No. SOP/SOS/01 dated 24 December 2017. The procedure is described how to identify people and/or community groups entitled to compensation. Based on interviews with 6 previous land owners or customary rights owners from the Mahuze Milafo and Mahuze Kewam clans and also as a Kindiki, Mandekman and Selil village community known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the land owner and landowners are given the freedom to release their land without coercion.

4.7.2

The company has procedure of Land Compensation, document No. SOP/SOS/01 dated 24 December 2017. The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on interviews with 6 previous land owners or customary rights owners from the Mahuze Milafo and Mahuze Kewam clans and also as a Mandekman, Kindiki and Selil village community known that they know about the procedure through the socialization given and they agree with the procedure and they can access the procedure through management representative of the company if they need it.

4.7.3

The company can show recapitulation of previous landowners who have been compensated. Based on interviews with 6 previous land owners or customary rights owners from the Mahuze Milafo and Mahuze Kewam clans and also as a Kindiki, Selil and Mandekman village community, the communities that have lost access and rights to land also provided opportunities to benefit from plantation development such as plasma plantation cooperation, job opportunity and other benefit in the form of CSR program.

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 and 4.8.4

Based on public consultation with related government agencies of Merauke District and village representatives (Kindiki Village, Selil Village and Mandekman Village) and interview 6 previous land owners, known that there is no land dispute case for the last 1 years until this assessment conducted in the scope certification area. Based on interviews with management of unit certification and the results of the auditor's search on online media, there is no historical or current land dispute in unit certification.

4.8.3

No evidences show that there is any acquisition process through dispossession or forced abandonment. Based on public consultation with related government agencies of Merauke District and village representatives (Kindiki Village,

Selil Village and Mandekman Village) and interview previous land owners, known that all land acquisition between local people and company representatives conducted as mutual agreement and the compensation process are done directed to the land owner and not diminish the legal/customary right, landowners are given the freedom to release their land without coercion.

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; 5.1.8

Based on the results of document review and interviews with the company, there are no independent smallholders who supply FFB to POM 2. Plasma that supplies FFB to POM 2 included in the scope of RSPO certification (Mandob Sejahtera Cooperative).

5.1.7

The results of document verifications it was known that the certification unit has routinely calibrated the weighing equipment carried out by third parties (Metrology Directorate, Marauke Regency), there are:

- Certificate of Test Results No. 308/PKTN.4.4/KHP/DL/12/2022 Brand: Precisa; PSC-6801; GO00151 which was carried out on 09 December 2022 valid until 25 November 2023.
- Certificate of Test Results No. 309/PKTN.4.4/KHP/DL/12/2022 Brand: Precisa; PSC-6801; GO00151 which was carried out on 09 December 2022 valid until 25 November 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.

5.1.9

Unit certification has the SOP for Handling Complaints and Dissatisfaction with the number SOP/SOS/04 dated July 20, 2020 as a reference for all employees in handling any complaints and dissatisfaction both from internal and external stakeholders related to the company, in accordance with applicable laws and regulations apply.

Implementation of handling complaints and dissatisfaction, among others:

- Related Department Managers together with the Public Relations Manager/ HRD Manager can handle complaints and dissatisfaction after obtaining approval from the General Manager/ Management. Responses to complaints and dissatisfaction are given as soon as possible and no later than 30 working days after the report is received.
- The Public Relations staff is responsible for recording the complainant's response whether the complainant is satisfied with the company's response in the complaint resolution report.
- If the complainant is dissatisfied with the company's response, a third party is needed to mediate so that the status of the complaint does not become a dispute.
- The Public Relations Manager is responsible for coordinating third parties and re-inviting the reporting party so that the problem or complaint submitted can be resolved immediately.

Based on document review of complaint book, there is no complaint from external stakeholders (e.g. plasma farmers, contractor, or vendors).

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

Unit certification has a cooperation agreement in the development of community plasma, for example is Mandob Sejahtera Cooperative (Agreement No. 001/BIA-KPPSMS/SPK/IX/2016) located in Kampung Mandekman Uililin

District, Merauke Regency dated September 23, 2016 which is valid for 30 years covering \pm 5,440 Ha (20% of the effective area of the plantation). The agreement is known by the local Regional Government namely the Head Forestry and Plantation Office, Head of Cooperative Office, Ulilin District Head and approved by the Merauke Regent. The determination of potential partnership partners based on the Merauke Regent Decree No. 522.1 / 523 / year 2016 concerning the determination of CPCL participants of community oil palm plasma and primary KSU Mandob Sejahtera oil palm plantations in Ulilin District and Muting District. Merauke with 274 farmers dated 26 September 2016.

The management of the plasma area is fully carried out by the company, so directly for plasma will be included in the scope of certification.

5.2.2

The management of the plasma area is fully carried out by the company, so directly for plasma will be included in the scope of certification. Unit of certification has also conducted socialization related to plantation management in accordance with the principles and criteria of the RSPO as well as cooperative managerial training to cooperative management to manage cooperatives well, for example held in 05 April 2023.

5.2.3

The management of the plasma area is fully carried out by the company, so directly for plasma will be included in the scope of certification.

5.2.4

The management of the plasma area is fully carried out by the company, so directly for plasma will be included in the scope of certification. The unit certification has conducted spray training of plasma workers. The unit certification showed evidence in the form of reports on socialization activities and spray training for Plasma Divisions 2 which were carried out on August 13, 2023 with 8 participants. The training included the practice of using spray PPE and the importance of PPE, handling pesticides, and spraying work techniques.

5.2.5

Unit of certification has reported the progress of the plasma farmer (Division 1,2, and 3) program in monthly basis in the Plantation Business Development Report which is reported to the Merauke Regency government.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1

UoC had a Policy concerning on discrimination disallowance in the workplace stated in the Director Decree No. BIA/DIR/13/171221 validated by the President Director on 22 December 2017. The group aims to provide fair and equal opportunities to all its workers. UoC committed to ensure that every operation activity never based on specific characteristic such as religion, ethnicity, race, group, class, and gender.

The company has also shown documentation of socialization of company policies including non-discrimination policies, such as socialization of Company Policy, Gender Committee and Complaint Handling on June 16 2023 in Division VIII Estate B which was attended by 53 participants.

Based on the interviews with the gender committee, female workers are given equal rights, wages and opportunities to get promotions with male workers of the same type of work, for example, there were also female workers in field, such as pesticide application activities.

6.1.2

The company has shown job vacancy announcements and work agreement letters between workers and company which showed that there was no payment requested during the recruitment process. In addition, in job vacancies that

have been published by company, there were no requirements that discriminated against gender, race or ethnicity, disability, sexual orientation, age, or belief.

For example, 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), the result of medical checkup, and work agreement letter. For example, Contract on behalf of KNO (harvester) number BPHNL/SPK/KT-230109-A dated 09 January 2023 concerning a 3 month trial period contract for Division II Estate C harvesters. Performance assessment document with a final score of 4.3 out of 5. Statement letter number BPHNL/SPK-P/220410-B dated April 10 2023 regarding the appointment of KNO as a permanent employee as of April 10 2023.

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.

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), the result of medical checkup, and work agreement letter. For example, Contract on behalf of KNO (harvester) number BPHNL/SPK/KT-230109-A dated 09 January 2023 concerning a 3 month trial period contract for Division II Estate C harvesters. Performance assessment document with a final score of 4.3 out of 5. Statement letter number BPHNL/SPK-P/220410-B dated April 10 2023 regarding the appointment of KNO as a permanent employee as of April 10 2023.

Termination due to retirement

Termination document such as the management decree of employment's termination on behalf of HRY (initial). The company also showed other supporting documents such as the letter of mutual agreement between Mager HR and HRY (foreman workshop A) dated 26 September 2022 regarding the calculation of retirement severance pay and has been approved by both parties.

Promotion

Promotion documents such as management decree for worker's promotion. For example, Decree number BPHNL/SK-P/230417-I dated 17 April 2023. concerning promotion on behalf BWN (initial) promoted from Asst Manager to Junior Manager Estate B) which is promoted from E07 to D01

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

Gender committees had been formed and still active until today in PT Bio Inti Agrindo which are chaired by the head of gender committee. The structure of the gender committee consists of male and female workers. The main objective of forming a gender committee is to provide a forum that can accommodate the aspirations or complaints of workers (especially women).

UoC showed the policy related to sexual harassment stated in Decree No. BIA/DIE/18/171221 validated on 22 December 2017. UoC also informed that they also socialized the protection of worker's reproductive rights and

disallowance of sexual harassment on 8 October 2021 to workers and workers' spouse. This procedure stated that if there were any violence or harassment, workers can communicate to the gender committee.

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 the Cases of alleged sexual harassment which have been processed at the Merauke Attorney General's Office in accordance with the summons of witness I on 31 January 2023. Cases of alleged sexual harassment which have been processed at the Merauke Attorney General's Office in accordance with the summons of witness II on 08 February 2023. Minutes of case resolution harassment on behalf of RKU (reporter) and MKS (reported) which was resolved on August 11 2022 at Estate B. If the reported person commits harassment again he will be taken to the Legal Realm.

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.

The results of interviews and the verification of workers' wages e.g harvester with worker with same work and same grade in Estate B), it is known that the company has given the same wages for the same scope of work and in the same grade. The company has determined the 2023 wage scale on February 3 2023 where the lowest wage is IDR 3,864,696 and the highest IDR 4,064,696 with the lowest grade is J and the highest grade is G.

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

UoC had procedures related to recruitment, selection, remuneration, promotion, retirement and termination of employment which are generally described in the Collective Labor Agreement period of 2021 to 2023 written in *Bahasa*. This CLA has been signed by the head of manpower agency of Merauke District. This CLA explained the working conditions and rights / obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, overtime, and other provisions. 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.

The implementation of the minimum wage in 2023 is in accordance with the Minimum Wage Decree of the Merauke District established by the Governor of Papua Selatan on 13 January 2023 worth IDR 3,864,696 which is valid as of January 1, 2023. All workers are permanent employees of PT BIA including those working in scheme smallholders so they only have one wage system in accordance with the Minimum Wage Decree of the Merauke District established by the Governor of Papua Selatan on 13 January 2023 worth IDR 3,864,696 which is valid as of January 1, 2023. The company has determined the 2023 wage scale on February 3 2023 where the lowest wage is IDR 3,864,696 and the highest IDR 4,064,696 with the lowest grade is J and the highest grade is G. Based on verification payroll document for workers of unit sample have been above the minimum wage set by local government. Besides that, the company has been implemented structure and scale wage based on years of service, ability, attendance and job performance. There are no late payments every month.

Based on the description above, it can be concluded that the certification unit already has documentation of wages and work requirements in accordance with applicable labor regulations for workers in the national language, along with explanations for workers in a language they understand.

6.2.2

UoC has CLA period 2021 to 2023 provided in *Bahasa* that explains the working conditions and rights / obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, working hours, remuneration, discipline, deduction, overtime, sick leaves, holiday entitlement, maternity leave, and other provisions. These all stated in each worker's work agreement. Explanations related to the contents of the company regulation, including:

- Article 35 concerning working time which explains that the working time is 7 hours per day or 6 working days in a week in which the total working hours are 40 hours in a week.
- Article 21 concerning wages which explains that the lowest wage of worker couldn't be lower than the minimum wage set by the government every year.

The company shows example of work agreement for worker of sample unit estate such as:

- Contract on behalf of KNO (harvester) number BPHNL/SPK/KT-230109-A dated 09 January 2023 concerning 3 month trial period contract for Division II Estate C harvesters. Performance assessment document with a final score of 4.3 out of 5. Statement letter number BPHNL/SPK-P/220410- B dated April 10 2023 regarding the appointment of KNO as a permanent employee as of April 10 2023.

Decree number BPHNL/SK-P/230417-I dated 17 April 2023. concerning promotion on behalf BWN (initial) promoted from Asst Manager to Junior Manager Estate B) which is promoted from E07 to D01.

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 May 2023 for example with worker YHN (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

Based on field visits and interviews with residents in Housing Division 3 Central Estate B, Housing Division 4 Estate B, Housing Division 4 and 5 Estate C and Housing Plasma Division 4, it was found that the housing drainage channel was in a stagnant condition and domestic waste was in the drainage channel.

The company has carried out repairs to several housing facilities, for example drainage improvements in accordance with the Work Implementation Minutes number 04/BPGEA-BAP-2023.03.028-A dated March 28 2023 regarding the completion of trench and terrace construction work and documentation in the form of photos of the repair results. In addition, the company shows damage identification documents, material calculations and budget for drainage construction, for example the budget for Division 3A is IDR 373,988,859.

The company has the opportunity to carry out housing drainage improvements for all divisions in accordance with the results of damage identification and the determined budget. (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.

6.2.6

In Indonesia there were no living wage standard is established, so UoC still implemented the national minimum wages for all workers. In addition to the payment of minimum wages, certification unit has been conducting an assessment of the prevailing wages and in-kind benefits provided to workers in the certification unit aligned with the RSPO Guidance for Implementing a Decent Living Wage.

UoC has the determination of assessment prevailing wage and all kinds of benefit for LW simulation in 2023 has been included in the calculation of housing facility costs, water costs, electricity cost, mineral water costs, educational cost, daycare facility, health cost, and integrated healthcare center (Posyandu). The results of these calculations are known that the standard of prevailing wage currently given / simulated by the certification unit is above the stipulation of the minimum wage, as follows: Basic salary as much as Rp. 3,864,696 per month and the total wage and inkind benefits are Rp. 3,398,000 per month. The results of these calculations are known that the standard of LW (Living Wage) currently given / simulated by the certification unit is above the stipulation of the minimum wage with scale of 87,92%.

Based on interview with works and document verification, the calculation data of prevailing wages is rational in accordance with the local price in Merauke District.

6.2.7

During the assessment, the certification unit still has workers with contract status (PKWT) such as employees who are on probation for 3 months. Based on the interview with the workers in field and document review, it's known that all main work or core work were permanent workers (PKWTT). UoC also showed their commitment stated in the CLA period of 2021 to 2023 that permanent works or core works are only for permanent workers (PKWTT).

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

UoC had a policy concerning on the freedom of association stated in the Directors Decree No. BIA/DIR/11/171221 validated by the Director. It stated that the UoC gave the freedom to all workers to form the labor union in accordance with applicable laws and being responsible and giving freedom towards the labor union to protect workers' rights and interests and improve workers' and their family member's welfare. The policy was published in *Bahasa* which can be understood by all employees.

Based on the interviews with labor union representatives (The head of labor union and The coordinator in Estate B), it explained that the company had given freedom of association and labor unions have been formed. The establishment of the union was in accordance with the applicable laws and regulations and has been recorded in Manpower Agency of Merauke District, as follows:

- The Registration Number. 001/DPC.K-SPSI/SK/MRK/XII/2018 of PT. Bio Inti Agrindo Labor Union on 17 December 2018.
- The establishment of labor union's organizer in 2021 No. 001/DPC.K-SPSI/SK/MRK/I/2021 on 16 January 2021.

Based on the foregoing, it can be concluded that the certification unit has published a statement acknowledging the freedom of association and the right to collective bargaining in the national language, in which the statement is explained to all workers in a language they understand and can prove its implementation.

6.3.2

UoC has well-documented the records of meetings between labor unions and management representatives as well as with internal labor union meetings. The following are examples of records of meetings conducted by labor unions in 2023, here as follows:

- Minutes of the tripartite meeting (SPSI, PT BIA and the Manpower Agency Merauke Regency) regarding negotiations on operating hours for generator engines in Estates A, B and C on June 10 2023 which was attended by 37 participants.
- Minutes of the SPSI Estate A and B meeting on May 7 2023 discussed the procedures for a work strike which was attended by 13 participants.

Based on the interviews with labor union representatives and their members who work in each unit, it's known that the labor union held meetings every month.

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 Agency. The company gives freedom for worker to express their opinion and also, certification unit did not give any intervention related to labor union activity.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1; 6.4.2; 6.4.3 and 6.4.4

UoC had a policy concerning on children/underage worker protection stated in Directors Decree No. BIA/DIR/17/171221 validated by the President Director on 22 December 2017. It stated that the group committed to not employ child labor in any operational activities. Uoc also showed the procedure of recruitment which stated that they do not employ underage worker.

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 CV. MCD Bintang Bone and PT Internusa Jaya Sejahtera, 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

UoC had a policy concerning on reproductive rights and the prevention of sexual harassment and violence stated in Directors Decree No. BIA/DIR/19/171221 validated on 22 December 2017 by the President Director. This policy stated that every worker is entitled to receive protection against sexual harassment in the workplace and if convicted of sexual abuse. UoC also committed to protect the health and the security of female workers by protecting their reproductive

rights. 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.

Based on the document review and the interview with the gender committee representatives, there was a reporting case related of alleged sexual harassment which have been processed at the Merauke Attorney General's Office in accordance with the summons of witness I on 31 January 2023. Cases of alleged sexual harassment which have been processed at the Merauke Attorney General's Office in accordance with the summons of witness II on 08 February 2023. Minutes of case resolution harassment on behalf of RKU (reporter) and MKS (reported) which was resolved on August 11 2022 at Estate B. If the reported person commits harassment again he will be taken to the Legal Realm.

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 each 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. Unit of Certification also showed the result of new mother's needs identification by Gender Committee in each Estate. From the results of the assessment, several things were known as follows:

- Maternal and Child Health Program
- Nutrition Program
- Exclusive Breastfeeding
- Lactation education

Based on new mother's needs identification, it was concluded that it was necessary to hold ultrasounds, exercise classes, *Posyandu*, provide daycare equipment for the comfort of breastfeeding mothers (breastfeeding chairs or mattresses for lying down).

6.5.4

UoC showed the procedure to accommodate complaints and grievance from external and internal including in sexual harassment and violence (No. SOP/SOS/04 validated on 20 May 2022). In the procedure described that if requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower). UoC also provided whistleblowing by email, phone, and letter to complaint reporting unit for any confidentiality grievance.

Based on the interviews with workers it's known that the workers already have sufficient understanding of the grievance mechanism. Related complaints of sexual harassment can be submitted to the gender committee.

	Status: Comply
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6.6

No forms of forced or trafficked labour are used.

6.6.1

UoC had a policy concerning on force-labor ban stated in No Deforestation, No Peat, No Exploitation (NDPE) Policy validated on 28 February 2020. The policy stated that the company respecting human rights and respecting employee rights such as the elimination of discrimination, the prohibition of forced and child labor, fair wage provisions, upholding the principle of gender equality in accordance with legal norms, and protecting migrant workers.

UoC also showed the procedure of recruitment (SOP/HRD/01) validated on 24 March 2022 by the President Director which informed that workers do not take any recruitment fees at any stage of the recruitment process, and no retention of passports/identity documents. UoC then showed that on each work agreement between the certification unit and the contractor/supplier, there were clauses related to fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the contractors.

Based on 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.

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.

6.6.2

Based on documents review and interviews with the manpower agency, gender committee, labor union, and workers at PT BIA, it's known that 11 migrant workers from South Korea placed in managerial job. UoC showed the data of migrant workers and their compliance in migrant workers regulation such as for example, Limited Stay Permit number 2C21JE3221-X on behalf of CS (initial), from South Korea which is valid until 10 May 2024, Limited Stay Permit number 2CU1JAB77697 on behalf of JB (initial) from South Korea which is valid until 29 March 2024.

During the assessment, the certification unit still has workers with contract status (PKWT) such as doctor and employees who are on probation for 3 months.. All the rights for each employment status has been distinguished for workers with contract status (PKWT) and the permanent status (PKWTT). There was no discrimination between contract workers and permanent workers.

Status: Comply

6.7

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

6.7.1

The unit certification shows the Decree OHS Committee Team endorsement by the relevant agency in accordance with the OHS Committee personnel, which is listed in the Decree of the Head of the Office of Industry, Trade, Cooperatives, SMEs (*UKM*), and Manpower number 009/P2K3/VI/2021 dated June 28, 2021 concerning Approval of PT Bio Inti Agrina's OHS Committee Structure. The OHS Committee Secretary has attended training on General OHS Expert Certification from the Ministry of Manpower of the Republic of Indonesia. The company also shows the company's determination certificate General OHS Expert with A.G.K (initials) number 5/4902/AS.02.04/IV/2021 dated April 27, 2021 and is valid for 3 years.

OHS Committee meetings have been held regularly every month with discussions of OHS issues and their follow-ups, for example the *P2K3* meeting on 17 February 2023 with discussions including:

- Ordering and repair procedures and others for Safety Line approval are still the same and HSE is required to attach comments according to the GL (General Ledger) Account for new safety.
- Special Medical Check Up inspections from each estate will record and recap based on the inspection results for

employees that need to be followed up and then sent to the Sustainability team.

- POSCO HSE audits
- ISO 45001:2018 External Audit Progress (Occupational Health and Safety Management System)

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

Based on the results of interviews with related agencies, the company's OHS Committee structure has been approved by the relevant agencies in accordance with statutory regulations.

6.7.2

OHS Procedure

The CH has a first aid procedure with document No. SOP/HSE/05 revision 1, effective August 20, 2022 explains that:

- Point 2.3.6 states that the contents of the first aid kit are in accordance with *Permenaker* 15 of 2008.
- Point 2.3.7 states that the placement of first aid kits must be in a condition that is easily accessible, clearly marked, in a visible location and easy to move when used, the type and number of boxes adjusted to the number of workers based on the Attachment of the Minister of Manpower No. 15 of 2008.

Risk Identification and Control

The company shows the Hazard Identification, Risk Analysis and Risk Control documents made by the PT Bio Inti Agrindo team which was approved by the management leader on June, 2023 which inform the identification of hazards (work activities, sources of danger, risks/impacts; risk analysis (current risk control, frequency, severity/consequence, risk level), and risk control (actions to reduce risk and responsibility (date / status)).

The document has discussed hazard identification, risk analysis, and risk control in every mill and estate operational activities such as crop maintenance (pesticide spraying, fertilizer application, empty longitudinal application, stem pruning, etc.), harvesting activities (including in areas near the flow electricity), transportation of FFB, all FFB processing activities (weighbridge, press stations, sampling, boiler stations, etc.), and general activities (warehouses, workshops, employee transportation, employee housing, garbage disposal, generator sets & water pumps, and security officers).

OHS Facilities and Infrastructure

- Clinic: There are 1 clinic available at Estate A which is also a health facility class-1 of *BPJS Kesehatan*.
- First aid kit and bag: First aid kit placed in strategic areas such as the estate office and, mill office, workshops and process offices while the first aid kit is given to each of the foreman of the estate.
- Fire Extinguisher: Provided in residential areas, plantation offices and factory offices, as well as each station in the factory.
- PPE: Given to every employee for free - Only according to the risk analysis of each work and can be replaced immediately if the PPE is damaged because it is used for work. Based on PPE handover documents, it is known that on March 07, 2022 the company carried out the re-distribution of PPE to employees. Companies can also show examples of detailed history of providing PPE from year to year per employee.
- OHS warning, evacuation routes and gathering points installed at strategic places.
- Visitor line in the mill area.

First aid officer

For field workers who are responsible as first aid officers are the foremen of each activity. Furthermore, those who served as first aid officers were daycare keeper, warehouse keepers, head of administration, and hazardous waste warehouse officers. Based on the results of interviews with first aid workers, it is known that officers can explain first aid actions in accidents. There are examples of first aid training given by company doctors, for example on March 29, 2022, which was attended by a total of 23 employees.

Apart from that, in the certification unit there are evacuation routes and gathering points during emergencies which are located at the Mill and Housing and Estate Offices.

6.7.3

The unit certification shows documents related to the provision of PPE in the document SOP for Personal Protective Equipment Management Number SOP/HSE/24 Revision 01, dated May 20, 2022. The guideline states that PPE that has been damaged or cannot function properly before the specified frequency of replacement may be requested for replacement by bringing the old PPE and obtaining approval from their respective superiors and available for free to the workers.

The company has the PPE identification used in PT Bio Inti Agrindo (POM-Estate, including workers for Plasma Estate). The document informs the PPE used at each station. For example, at the boiler stations, the PPE used is a helmet, earplug and earmuff, safety shoes, masks and gloves. Based on field visit on Kernel Station and Sterilizer Station, it is known that the worker already wears a PPE according to the hazard and risk identification. Based on interviews with spraying workers, it was found that the workers had understood the mechanism for storing PPE after work and doing cleaning in the rinse room. Furthermore, workers have also understood the mechanism for replacing PPE. All broken and/or improper PPE is able to be replaced by showing the used PPE as evidence. The company can show records of PPE expenditure for the Estate B on October 28, 2022, PPE such as boots to 5 employees, PPE expenditure for the Plasma Estate on September 13, 2022, PPE such as boots to 10 employees and PE expenditure for the POM 2 on September 13, 2022, PPE such as safety shoes and ear plug to 3 employees. Therefore, based on field observations in the warehouse, it was known that the company had provided spare PPE, including boots and spray equipment available in the rinse room. Pesticide applicator at Plasma Estate also use the rinse room facility at Division Estate also Safety Data Sheet (SDS) for pesticides used is readily available for easy reference in Bahasa.

Based on the results of field observations in Division 3 and 4 Estate B, it is known that the company has provided sanitation facilities (Rinse House), with the condition that there is 1 bathroom and a place for storage and cleaning of PPE for fertilizer applications and herbicide applications and the wastewater reused for herbicide applications. The company shows the design/plan for the renovation of the existing Rinse House building, in which there will be the addition of 4 bathroom units.

Based on this explanation, the company has the opportunity to ensure that the completion of the ongoing Rinse House renovation goes according to plan. **OFI**

6.7.4

Unit of certification provided health services such as clinics and paramedics. Based on field observations, it was known that the facilities and infrastructure provided due to medical services for workers are in proper condition. Based on the documents review and interviews with workers (harvesters, pesticide applicators, mill operators), it revealed that all workers were registered in the BPJS program. The BPJS has been paid for all workers in accordance with the number of total workers in its payment period, proven as follows:

- BPJS (Health Insurance) payments for PT BIA have been fulfilled and the last proof of payment is on April 10, 2023 for period of March 2023 for 3,465 workers and 2,745 families who are dependents of workers.
- BPJS (Health Insurance) payments for PT BIA – Plasma Estate have been fulfilled and the last proof of payment is on April 10, 2023 for period of March 2023 for 594 workers and 347 families who are dependents of workers.
- BPJS (Social Security Insurance) payments for PT BIA have been fulfilled and the last proof of payment is on April 6, 2023 for period of March 2023 for 3,565 workers.
- BPJS (Social Security Insurance) payments for PT BIA – Plasma Estate have been fulfilled and the last proof of payment is on April 10, 2023 for period of March 2023 for 672 workers.

Based on the interviews with workers (harvesters, pesticide applicators, and mill operators) and labor union, they informed that they had the acknowledgement of their involvement in BPJS program and they also held the BPJS card.

6.7.5

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

UNIT	TOTAL WORKER	CASE	FR	SR
PT Bio Inti Agrindo – Estate B	1,178	12 Cases with no cause of fatality	4.27	17.78
PT Bio Inti Agrindo – Estate C	1,193	17 Cases with no cause of fatality	0.14	0.51
Plasma Estate	679	8 Cases with no cause of fatality	2.15	4.31
Mill – POM 2	100	3 Cases with no cause of fatality	8.83	26.50

From the results of a review of work accident records during the 2022 period, it is known that there were no major accidents that required the company to make a claim to the BPJS.

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 unit certification has a plan for handling IPM documented in the Annual Work Plan. The plan is detailed in the Monthly Work Plan which will be realized in the Manager Monthly Report. Identification of potential pests listed in the SOP for Plant Pest Control (SOP/KBN/12) dated December 24, 2017. The types of pests identified can cause potential including leaf-eating caterpillars, Rats, beetles, grasshoppers and pigs. While the types of diseases identified include: ganoderma, stem rot, marasmius infection and shoot rot. The control method used is a combination of biological, mechanical, chemical and physical control.

The unit certification shows documents related to Pest and Disease monitoring in 2022. The data is the result of the census of bagworms, fireworms, and rats. Based on the study of the document, it is known that the rat attack ranges from 0 - 4.5%, which means it is still below the control threshold.

7.1.2

Based on field observation in Estate B and Division 2, 3 and 4 Plasma, and interviews with management representatives, it is known that the company does not use invasive species as regulated in the Minister of Environment Regulation No.P.94/MENLHK/SEKJEN/KUM.1/12/2016. From the results of field observations, it is also known that the company uses *Turnera subulata*, *Antogonon leptosus*, and *Cassia cobanensis* for IPM.

7.1.3

Based on document reviews, field observations, and interviews with workers and stakeholders, it is known that the company does not use fire to control pests.

Status: Comply

7.2

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

7.2.1

The company has shown a list of pesticides used by the company. In the document, it has been explained about the target of the pesticides used. The list of pesticides used by the company is as follows:

No	Name	Active Ingredients	Target	LD50 (mg/Kg)		Class
.				Acute Oral	Acute Dermal	

1	Ally WG 20	Metil metsulfuron 20 %	Broadleaf weeds: Chromolaena odorata, Ageratum conyzoides, Clidemia hirta.	>2000	>2000	U
2	Round Up	Isopropil amina glifosat 486 g/l	Broadleaf weed Mikania micrantha, Synedrella nodiflora; narrow-leaved weed Digitaria ciliaris, Axonopus compressus, Ottochloa nodosa	>2000	>2000	III
3	Garlon 670 EC	Triklopir Butoksi etil ester 480 g/l	To control common weeds in oil palm cultivation	50-2000	50-2000	III

The company has SOP and work instruction on weeds management, the guidance covering about chosen, storage, application, contaminated handling, known about signs and symptoms of pesticides poison and first aid for poison case. To ensure pesticide used are in accordance with the target, company conducted identification the type of weed found in operational area. Based on interview with management representative the economic threshold of 5% according to the procedure is being implemented. The company is currently optimizing the usage of *turnera* and *antigonon* to tackle caterpillar pest.

7.2.2

The company has documented records of pesticide toxicity in the document of Monthly Pesticide Toxicity Data. The document is recorded product name, active ingredients, LD₅₀, the area treated, amount of active ingredients applied per Ha, and total application. This document is constantly recorded and updated by the Estate Sustainability Officer every month. For example, the use of herbicides with the active ingredient Metil metsulfuron 20, dermal LD50 2000 mg/Kg, oral LD50 2000 mg/Kg, total use in 2022 was 633 Kg with an area of use of 11,658 ha and usage/ha was 0.052 kg/ha on Estate B.

7.2.3

Regarding the commitment to reduce the use of pesticides, it has been stated in the Directors' Decree number BIA/DIR/27/200702 concerning plant nuisance object control which was ratified by the President Director on July 2, 2020. Which explains, among other things, stating that it will suppress as much as possible the use of chemicals in plant nuisance object control, protecting natural predator organisms, and using chemicals as a last resort.

The company shows records of herbicide use for the 2021-2022 period, among others as follows:

ESTATE	HERBICIDE	UNIT	2021	2022
			USE	USE
Estate B, C and Plasma Estate Division 2, 3 and 4	<i>Amonium glufosinat</i>	L	10,349	6,897
	<i>Glyphosate</i>	L	33,296	16,651
	<i>Methyl-Metsulfuron</i>	Kg	195	633

Based on a review of the pesticide use documents, it is known that (there has been a reduction in the use of *Ammonium glufosinate* and *Glyphosate* pesticides).

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

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

Regarding the commitment to reduce the use of pesticides, it has been stated in the Directors' Decree number BIA/DIR/27/200702 concerning plant nuisance object control which was ratified by the President Director on 02 July 2020. Which explains, among other things, stating that it will suppress as much as possible the use of chemicals in plant nuisance object control, protecting natural predator organisms, and using chemicals as a last resort.

7.2.4

PT Bio Inti Agrindo has the program to reduce pesticide usage by replacing pesticides with biological controls such as using natural predators to control pest by planting the beneficial plant. The company also controls caterpillar pests by planting and maintaining host plants for natural enemies of pests such as *Turnera subulata*. Based on field observations, it can be seen that the *Turnera subulata* plants along the main road and collecting road are already well developed.

There is no prophylactic method in the use of pesticides by companies. The company also only conducts chemical control if the results of the pest attack census have exceeded the threshold. From the recording of using pesticides in Estate B and Plasma Estate Division 1 during the period 2022, there are no pest attacks that have exceeded the limit. The pesticide used during this period was herbicide in weed control in the field

7.2.5

The list of pesticides used by the company includes:

Merk	Active Ingredients	No. Permit	Validity period
Ally	Metil Metsulfuron	RI.0103011988837	12 November 2023
Round up	Isopropil amina glifosat	RI.01030120001560	11 Juni 2025
Garlon	Triclopir	RI.01030120155148	31 Januari 2025
Kenbast	Amonium glifosinat	RI.01030120062408	22 Februari 2026

The document contains the type and name of the pesticide, physical form, active ingredient, group according to WHO, LD50, working method, target selective, dose, manufacturer, register number at the Pesticide Commission, and distribution permit. From the review of the document, it is known that the pesticides used do not fall into categories 1A, 1B, the Stockholm/Rotterdam Convention, and there is no paraquat.

The company has a commitment to reduce pesticides in plantation operations, which is contained in the Pesticide Use Policy which was approved by the Director of Operations on July 10, 2018. This policy is a refinement of the Management Instruction dated December 19, 2016, regarding the termination of the purchase and use of Gramoxone. This pesticide policy states, among other things, that the IPM program, if possible, will use more environmentally friendly and more efficient use of biological and non-chemical methods. With this concept, the use of pesticides that are limited in nature such as paraquat is not used. Based on document verification, the company will not use paraquat and WHO Class 1A or 1B, or those registered by the Stockholm or Rotterdam Convention applications.

7.2.6

The company shows procedures/policies related to pesticide mitigation which are contained in document Number SOP/HSE/18 which has been approved by the Management and is effective since December 14, 2017 concerning SOP for Management and Control of Hazardous Material, this document explains the classification of pesticides, procedures for using pesticides, pesticide storage, pesticide poisoning and its symptoms, first aid for pesticide poisoning.

The company also provided information materials of periodic training on pesticide handling that was held on May 5, 2023 and was attended by 9 participants.

The pesticide applicator also using personal protective equipment in accordance with specified hazard identification and material safety data sheet such as respirator mask, gloves, safety shoes, apron and goggles. In addition, employees are also informed about the steps of secure work in each roll call in the morning before work. Meanwhile, the spraying workers interviewed also claimed that after spraying they will be washing up and drying up the PPE and spraying tools (sprayer tank, jerry, etc.), and taking shower/changing clothes in special place near pesticide store of the division office. Therefore, based on field observation to mixing area in Estate B, that known there are storage for

keeping all PPE's and spraying tools after use also Safety Data Sheet (SDS) for pesticides used is readily available for easy reference in Bahasa.

7.2.7

The unit certification has procedures for storing pesticides in the Hazardous Material Management and Control Procedure (No: SOP/HSE/18, December 24, 2017).

Based on field observations to the company's pesticide storage warehouse, it is known that the storage of pesticides has been carried out according to existing procedures such as material safety data sheet, separate locations from other items and the floor is concrete so it is minimized pollute the environment if there is a spill. Besides that, there is a symbol of toxic hazardous.

Companies can show evidence that pesticide mitigation policies/procedures have been socialized to related workers. For example, based on interviews with Estate A spray workers, it is known that these personnel can explain pesticide mitigation policies/procedures.

7.2.8

From the results of field observation in mixing area in B, C Estate, and Plasma found that all pesticide container is collected, marked, and reused only for pesticide application activities. Some of the containers have been damaged are designated in certain storage area then managed by licensed waste transporter proved with waste manifests and log book. Based on field observation in housing area B, C Estate, and Plasma, it was found that there were no traces of chemical packaging used as water reservoirs or other housing activities.

7.2.9

Based on field observations in Estate B and Plasma Division 2, 3 and 4, it is known that there is no air spraying in pest control. Based on interviews with management representatives, it was also found that there was no use of fire in pest control. Biological pest control uses beneficial plants and chemically using a sprayer and by placing it by hand for rat pests if any.

7.2.10

The company already has a health check-up plan for all employees, which is contained in the 2023 Budgeting Sustainability document dated January 2, 2023. The document outlines plan to carry out periodic health checks in August 2023 for all employees and special checks for high-risk employees in November 2023.

For special health checks conducted on November 8 – 23, 2022, Reports on the results of the Occupational Health Examination (Audiometry, Cholinesterase, and Spirometry) at PT Bio Inti Agrindo in 2022 have been shown, such as the results of the Audiometry Examination, which were attended by 324 workers and indicated hearing loss in 135 workers; the Spirometry Examination Results, followed by 1,070 workers, and decreased lung function were identified in 53 workers; and the Cholinesterase Examination Results and mild poisoning were identified in 24 workers. Workers with mild poisoning are given rest for 2 weeks or more for recovery and for hearing loss and lung function to be examined further by the company doctor.

The results of interviews with company representatives revealed that the health check results had been followed up. As an example, a follow-up examination has been shown for workers according to the recommendations for the previous health check, including workers with the initials HRM with pulmonary disorders who underwent a follow-up examination on April 17, 2023, with recommendations for further consultation with a pulmonary specialist.

The company conducts follow-up for employees who experience health problems by conducting a re-examination by the company doctor.

7.2.11

The company has a policy that prohibits pregnant and breast-feeding personnel working with chemical material on Board of Directors Decree (No: BIA/DIR/21/171221, dated 22 December 2017) regarding the Policy of women workers.

Based on interview with spraying personnel, it is known that there was neither pregnant nor breast-feeding female personnel who work with pesticide. Audit team also got information that the personnel have understood that female personnel cannot work with chemical material if they are pregnant or breastfeeding.

Status: Comply

7.3

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

7.3.1

Unit of certification already has the identification document of waste sources for the 2023 period with details: ex sacks of fertilizer, inner plastic of fertilizer sack, used oil from generator, used neon/lights, wastewater, EFB, shell, fibre, dash of incinerator, dash of boiler, domestic waste, paper and others.

Hazardous and Toxic Waste

Unit certification has a temporary storage permit for hazardous and toxic waste, through several document, there are;

- **POM 2:** Statement of the Fulfillment of the Commitment of PT Bio Inti Agrindo from the decree of DPMPTSP of Merauke Regency with Number 660/03/IPL-B3/XII/2020 on December 8 2020. The location coordinates of the hazardous waste storage are S: 0705'44.25324" and E:140048'27.02815".
- **Estate B:** the Decree of the Head of the DPMPTSP of Merauke Regency Number 06/IPL/VII/ of 2018 on July 11 2018 with a validity period of 5 years. The location coordinates of the hazardous waste storage are S: 07005'07.39" South Latitude and E: 140047'9.26".
- **Estate C:** the Decree of the Head of the DPMPTSP of Merauke Regency Number 04/IPL/IV/ of 2018 on April 27 2018 with a validity period of 5 years. The location coordinates of the hazardous waste storage are S: 07002'09.2" and E: 140054'30.5".

The certification unit has management procedures for medical waste listed in the SOP for Handling and Management of Hazardous Waste (Document No. SOP/HSE/20, dated 24 December 2017), which explains that clinical waste is packaged separately and then sent to hospitals or other places that have licensed incinerator facilities.

From the results of field visits to clinics in Estates B and C, it is known that currently medical waste is managed by putting it in yellow infectious bags and storing it in closed medical waste bins and then sending it periodically to licensed waste managers. Currently, the company is in the process of procuring cold storage and planning to place centralized medical waste at Hazardous Storage in Estate B.

Based on this description, during the process of processing permits and moving storage locations, companies have the opportunity to ensure that the management of the medical waste produced is documented and implemented in accordance with applicable laws and regulations. **OFI**

Based on field observations at the licensed hazardous waste storage located at B Estate, it is known that the storage building is a permanent building with ventilation according to the coordinates on the permit. In addition, there are emergency response facilities such as fire extinguisher, eye wash, alarm, symbols and labels, sand powder to clean up spills, first aid kits, and a logbook.

In its management, PT Bio Inti Agrindo has a cooperation agreement as a party to collect and transport, namely **PT Primanru Jaya** (as land transporter) based on the document number 001/LGL/MOU/PMJ-BIA/I/2022 dated 28 March 2023 which is valid until 02 January 2024. And PT Salam Pacific Indonesia Lines (Sea Transport Transporter) based on the document number 0239/SPIL.BIA/PJ/III/2023 dated 03 January 2022 which is valid until 31 July 2023. The types of waste that can be handled are used oil, contaminated waste, oil filters, contaminated gloves, packaging contaminated, used batteries, used liquid/solid chemicals, LED lamps, and medical waste.

For utilization and/ processing of waste, **PT Primanru Jaya** as the transporter collaborates with advanced waste processors, namely;

- **PT Pengolahan Limbah Industri Bekasi**, with work agreement number number 174/PMJ-PLIB/VII/2021 dated 22 Juli 2021, valid until 26 Juli 2022.
- **PT Non Ferindo Utama**, with work agreement number 037/PGA/NFU/I/2022 dated tanggal 3 Januari 2022, valid until 2 Januari 2023.
- **PT Cing Khai Lie**, with work agreement number 189/LGL/MOU/PMJ-CKL/VI/2022 dated 11 Juni 2022, valid until 10 Juni 2024.
- **PT Hidup Makmur Jaya Abadi**, with work agreement number 188/LGL/MOU/PMJ-HMJA/VIII/2019 dated 19 Agustus 2019.

PT BIA has implemented hazardous waste management in accordance with its procedures and PP Number 22 of 2021 and has carried out document reporting every quarter by record and document waste stored in logbook and balance sheet, for the period until June 2023, the categories of waste types stored, and documenting the waste handed over to the transporters in the form of electronic manifest evidence. The following are several examples of manifest data from transportation carried out on 03 May 2023 which were transported by vehicles with plate number DS 9036 GC (PT BIA), SPIL Hasya Ship (PT SPIL), B 9185 NEH (PT Primanru Jaya).

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.

Liquid Waste (POME)

Liquid waste generated from the factory is reused for Land Applications (LA). Before being channelled 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. (*Explained in 7.8.3*)

Domestic Waste

Domestic waste generated from housing and offices will be disposed of in Landfills. Afterward, liquid waste generated housing complex and office be managed on septic tanks.

7.3.2

The certification unit has the following procedures:

- SOP for Handling and Management of Hazardous Waste No. SOP/HSE/20, dated 24 December 2017. The SOP explains regarding waste identification, separation according to type of waste and temporary waste storage, all hazardous waste is handed over to companies that have permission from environment agency, the officers of warehouse is responsible for reporting waste handling activities at the storage, and HSE reports all handling activities to the relevant agencies.
- SOP for Domestic Waste Management No. SOP/HSE/19, for domestic waste the certification unit has not carried out a sorting and reuse program, non-B3 waste is handled by stockpiling it in the designated in landfill area.

The company has identified waste generated from factory and plantation activities. The identified wastes are for example:

- Used thinner packaging is included in the contaminated category.
- Used pesticide packaging is included in the used contaminated category.
- Used paint packaging falls into the contaminated category.
- Used oil drums fall into the contaminated category.
- Domestic household waste is included in the non-hazardous waste category.

Based on the results of the field visit, the following was found:

- Piles of domestic waste and rubbish scattered along the drainage in the Estate B Division 3 and 4 employee housing area.
- There are 3 units of used round-up packaging, 20 units of used oil packaging, 1 paint packaging, 20 liters of used

oil in the Estate B Division 4 employee housing area.

- Domestic waste management at Landfill area Estate B is still mixed with B3 waste.
- 2 piles of household rubbish in the old barracks area and the contractor's residence and rubbish scattered along the ditch in the Estate C Division 1 employee housing area.
- Domestic waste management at Landfill area Estate C currently uses an open storage system and there is waste spilled around the area.
- Piles of household rubbish and scattered rubbish scattered along the drainage in Plasma Division 2 employee housing area.
- 1-unit ex-oil drum used as a water container in Plasma Division 2 employee housing area.

The results of interviews with residents of Estate B Division 4, Estate C Division 1, and Plasma Division 2 housing complexes show that they already know and have received socialization regarding the disposal of household waste, the prohibition on the use of used chemical packaging for domestic purposes, and the prohibition on burning. Based on this explanation, the company has not been able to show evidence that waste disposal is in accordance with its procedures. This becomes **Non-Conformity No. 2023.03 with the Minor raised to Major Category**.

7.3.3

The certification unit has the following procedures:

- SOP for Handling and Management of Hazardous Waste Number SOP/HSE/20 dated 24 December 2017 explains that the destruction of Non-Hazardous and Toxic waste (Domestic) must not be burned because it will cause air pollution.
- Non-B3 Waste Control SOP No. SOP/HSE/19, for domestic waste the certification unit has not carried out a sorting and reuse program, non-B3 waste is handled by stockpiling it in the designated to landfill.
- Announcement No. HSE.EB 011022 dated October 1, 2022, according to Directors Decree No. BIA/DIR/28/220505 concerning K3 and Environmental Policy, where one of the points states "Prevention of Environmental Pollution", within the scope of service products, employees are prohibited from disposing of hazardous waste in landfill area, and are not permitted to carry out waste burning activities in the surrounding housing area.

Based on the results of the sample field visit, the following was found:

- There is 1 domestic waste burning point in the employees housing for Estate B Division 3.
- There is 1 domestic waste burning point in the employees housing for Plasma Division 2.

Then, based on the results of interviews with residents of Estate B Division 3 dan Plasma Division 2, employee housing, it was stated that waste transportation was carried out once a week so that residents avoided the accumulation of daily waste produced by burning it after being collected in the yard.

Based on the description of the evidence above, the company has not been able to show sufficient evidence that the destruction of domestic waste is in accordance with the procedures it has. This becomes **Non-Conformity No. 2023.04 with the Minor raised to Major Category**.

7.3.2	Status: Nonconformity No. 2023.03 with the Minor raised to Major category
7.3.3	Status: Nonconformity No. 2023.04 with the Minor raised to Major category

7.4

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

7.4.1

The unit certification has an SOP to manage soil fertility in order to optimize yields, which has not changed since the previous audit, namely:

- Immature Plant Care SOP (SOP/KBN/04) dated December 24, 2017
- SOP for Producing Plant Care (SOP/KBN/05) dated December 24, 2017
- Plant Fertilization SOP (SOP/KBN/06) dated December 24, 2017

The implementation and monitoring of SOP can be seen from the monitoring of fertilization work by each division while monitoring the results of the fertilizing performance is carried out by the agronomics section on quality control.

7.4.2

To find out the soil fertility, the company conducting of soil and leaf analysis periodically as follows:

Soil Analysis Activities

- Estate B Soil Analysis Number 1271/CPS/XI/2020, dated November 24, 2020, issued by the Central Plantation Services Laboratory of PT Central Alam Resources Lestari for a total of 11 samples The parameters analyzed included water content, pH, H₂O, Total N, P Bray II, Total B, Exch K, Exch Mg, Exch Ca, and Exch Na.
- Estate Soil Analysis C Number 1277/CPS/XII/2019, dated December 20, 2019, issued by the Central Plantation Services Laboratory of PT Central Alam Resources Lestari for a total of 30 samples The parameters analyzed included water content, pH, H₂O, Total N, P Bray II, Total B, Exch K, Exch Mg, Exch Ca, and Exch Na.
- Plasma Estate Soil Analysis Number B1854/CPS/X/2022, dated October 4, 2022, issued by the Central Plantation Services Laboratory of PT Central Alam Resources Lestari for a total of 4 samples The parameters analyzed included water content, pH, H₂O, Total N, P Bray II, Total B, Exch K, Exch Mg, Exch Ca, and Exch Na.

Leaf Analysis Activities

- Estate B Leaf Analysis Number B1850/CPS/IX/2022, dated September 27, 2022, issued by the Central Plantation Services Laboratory of PT Central Alam Resources Lestari for a total of 120 samples The parameters analyzed include N, P, K, Mg, Ca, and B.
- Estate C Leaf Analysis Number B1851/CPS/IX/2022, dated September 28, 2022, issued by the Central Plantation Services Laboratory of PT Central Alam Resources Lestari for a total of 100 samples The parameters analyzed include N, P, K, Mg, Ca, and B.
- Plasma Estate Leaf Analysis Number B1852/CPS/X/2022, dated October 5, 2022, issued by the Central Plantation Services Laboratory of PT Central Alam Resources Lestari for a total of 60 samples The parameters analyzed include Total N, P, K, Mg, Ca, and B.

Visual Analysis Activities

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

7.4.3

The company shows a record of the realization of empty bunch at Estate B, C and Plasma Estate Division 2,3 and 4 on years 2022 and 2023 from POM 2, with details:

Location	Empty Bunch 2022	Empty Bunch 2023
	Tonnage	Tonnage
POM 2	36,158	13,674.49

The company also shows a record of the realization of palm oil liquid waste (POME) applications in year 2022 is 269,304 M3 and up to May 2023 for 27,445 M3 as well as with boiler ash in year 2022 is 6,146 tons and up to May 2023 for 2,165.22 tons.

The company has a recording strategy for nutrient recycling which includes the use of EFB applications, palm oil mill effluent application, and boiler ash. Based on field visit to Estate B and Plasma Division 2, 3 and 4, the EFB applied between plants. In addition, EFB is also used as mulch for the planting of beneficial plants.

7.4.4

The company has a recording strategy for nutrient recycling which includes fertilization realization, fiber and Shell usage, EFB application, land application and frond usage. Based on the results of the document review, the company regularly records the activities (Period 2022), including the following:

- Realization of NPK 13 on Estate B with amount 6,018.25 Tons.
- Realization of TSP on Plasma Estate with amount 251 Tons.

- Realization of MOP on Estate C with amount 1,102 Tons.

The result from the field visit indicated that such activity has been correctly done in accordance with the provided recommendation.

Status: Comply

7.5
Practices minimize and control erosion and degradation of soils.
7.5.1, 7.5.2 and 7.5.3

The unit certification has maps that identify marginal and fragile areas, topographic maps that explain land slopes and maps of peat areas. The map is used to identify areas that are not suitable for planting. Based on general field observations, it is known that the area in PT Bio Inti Agrindo is predominantly flat. There is no steep area planted with oil palm.

At the time the audit is carried out, the unit certification did not have plans to carry out replanting activities. The oldest age of a palm oil plant in the company's operational area is 9 years (PY 2014). At the time of the audit activity, there were no new planting activities in the area of the company's management. Based on the topographic map shown also concluded that there is no steep slope land in the company area. The dominant corporate management area is flat and bumpy. from the results of field observations to Estate B and Plasma Division 2, 3 and 4, it is also known that there is no new planting and replanting carried out by the company.

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 and 7.6.2

The unit certification has a soil survey that identified the type of soil. The company maintains a map that identifies marginal and fragile areas, a topographic map describing the slope of the land and a map of the area PT Bio Inti Agrindo. Besides that, this maps information is used by the company in the development of oil palm plantations which are now underway such as the establishment of road, bridge, trench and other infrastructure. There is no peat soil type in the area managed by PT Bio Inti Agrindo.

Based on Soil Survey and Land Suitability Evaluation PT Bio Inti Agrindo, it is known that PT Bio Inti Agrindo concession is situated less than 100 meters. The dominant elevation is 40-60 meter above sea level covering nearly the entire area. Areas with 60-68 meter above sea level elevation is found in the north and west parts of Estate A. Slope in PT Bio Inti Agrindo is around 3-15% with dominant slope class of 8-15%. Based on field observations at Estate B and Plasma Division 2, it is known that the area in PT Bio Inti Agrindo is predominantly flat. There is no steep area.

7.6.3

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

Status: Comply

7.7
No new planting on peat, regardless of depth after November 15th, 2018 and all peatlands are managed responsibly.
7.7.1 – 7.7.7

The unit certification has a Soil Map by Aksenta on October 2018, which has not changed from the previous audit. Based on that document, it is known that soil type namely Oxic Dystrudepts, Typic Hapludults, Typic Plintudults, Aquic

Hapludults, Psammentik Dystrudepts and Typic Dystrudepts. There is no peat soil type in the area managed by PT Bio Inti Agrindo.

Based on field observations at Estate B and Plasma Division 3, it is known that the area in PT Bio Inti Agrindo is dominantly flat. There is no peat area.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

Procedures for identifying, managing and maintaining water sources and quality are presented in several documents, including the following:

- Document No. SOP/HSE/14 (Rev. 01) dated December 1, 2019 concerning Management and Monitoring of Border Areas. Procedures cover riparian management, implementation of riparian conservation, maintenance of springs, monitoring of riparian areas, socialization and training, as well as reporting and evaluation.
- Document No. SOP/HSE/016 dated 24 December 2017 concerning monitoring and measuring environmental quality. Procedures include, among other things, activity plans for measuring water quality, physical and chemical components of surface water that are monitored including: TSS, BOD, COD and pH, maintenance of conservation areas consisting of springs and river banks.

PT Bio Inti Agrindo can showed efforts to manage water and maintain water sources by measuring surface water quality on physical, chemical and microbiological parameters by a KAN accredited laboratory (LP-1342-IDN) in several sampling location, there are; Bian River, Kukumit River, Division IV Estate A or Loo sub-River, Divisi I Estate A or Mill sub-River, Divisi III Estate A or Mill sub-River (inlet dan outlet), Mandom River, Mandom sub-River, also well water at Estate B and C.

Based on the results of surface water quality testing, it is known that all test parameters comply with the quality standards in PP No. 22 of 2021. Apart from that, as a form of preventive action in environmental management and monitoring to prevent and reduce the concentration of parameters that do not comply with quality standards, the company has ensured best practices in waste management by ensuring that no waste flows into the body. environment directly, ensuring that domestic liquid waste is managed by providing septic tanks and several management activities in accordance with the company's management plan.

The results of interviews with resident in the housing area of B, C Estate and POM 2 revealed that there were no problem with availability of clean water, water was obtained free of charge, with the criteria of being odorless, colorless, and tasteless.

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 effort of sustainable management of water resources.

7.8.2

PT Bio Inti Agrindo carries out several management activities to improve river water quality contained in the *RKL-RPL* matrix which is managed and reported periodically every semester, such as;

- Take surface water quality samples by referring to the quality standards of PP No. 22 of 2021 attachment IV.
- Sampling of clean water for housing purposes by referring to the quality standards of Minister of Health Regulation No. 32 of 2017 water for hygiene sanitation purposes.
- Rehabilitation program in conservation areas.
- Patrols to monitor erosion in river border areas.
- Prohibition of chemical application in water catchment areas.
- Outreach to workers and the community regarding conservation area management.

The certification unit has a water body map with a scale of 1: 1:92,000. The available map includes the map title, map scale, map source and basic data, legend, river flow, and location coordinates.

Based on field observation in Mat River Block 1-7 Division 2 Estate B, known that have been equipped with spray boundary signs, area boards protected areas, and planting areas of woody plants.

7.8.3

Management of POME from oil palm processing from with totaling 7 waste ponds with a multifeeding system that is by feeding simultaneously evenly. Company has permit document from DPMPTSP Merauke Regency No. 501/004/IPAL/2019 dated May 27, 2019 (in the process of expanding the scope of POM 2 permits). Before being used, the POME 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.28 & 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 land (Land Application) with 55,68 ha in blocks 7-19, 7-20, 7-23 and 7-24. This application dose covers the entire liquid waste generated by the factory, so there is no discharge of POME into water bodies. Based on these data, and when compared with the responsibility contained in the Permit, indicates that the company has complied with.

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 KAN accredited laboratory (LP-1342-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 the results of interviews with the Environmental Agency of Merauke Regency regarding the management of POME at the WWTP, there were no complain related to environmental pollution. The results of interviews with the representative of Kindiki and Selil Village around the company also stated that there was no pollution occur.

Companies can show proof of waste monitoring and management reporting to authorized agencies and document it, for example:

- Wastewater Utilization Report on Land in Estate B for the Fourth Quarter Period of 2022 dated January 11 2023 to the Environmental Service of Merauke Regency and Papua Selatan Province.
- Wastewater Utilization Report on Land in Estate B for the First Quarter of 2023 on April 5 2023 to the Environmental Service of Merauke Regency and Papua Selatan Province.

7.8.4

The certification unit already has a groundwater utilization permit based on decree head of *PUPR* No. 576/KPTS/M/2021 concerning Surface Water Utilization Permit to PT Bio Inti Agrindo – POM 2 dated 10 May 2021. Explained in the permit that the maximum quota for water intake discharge is **72,000 m³/month** taken from 1 intake location at Bian River.

The water usage for FFB processing has been monitored and documented. The document of water usage for FFB processed in period of May 2022 – April 2023 shown that the water usage in the range of 47,602 m³/month, this is still in accordance with the water quotas that can be utilized with the quota specified in the permit held. The unit certification also paid of water usage retribution every month for the entire scope of certification to BPPD Papua Province in monthly basis. For example, proof of payment to in April 2023 which was paid on May 06, 2023 with the amount of debit paid according to the amount of usage debit.

From the results of management interviews and field observations to Water Treatment Plan (WTP) in POM 2, known that the flowmeter used is still functioning properly, and the officer responsible for WTP is understanding about the operational and recording flowmeter data every day.

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 from the rest of the mill production process as renewable fuel for boiler purposes in year 2022.

Based on the results of interviews and document verification, it shows that all solid waste in the form of shells and is used to substitute diesel fuel, this utilized and the usage data recorded in detail and traceable. From data shows, it is known that the company has saved 91,34 % of diesel fuel, of the total diesel that should have been used as evidence of energy efficiency produced from use of renewable energy. This is also evidenced by the decreased amount of diesel used, in 2022 as many as 262.289 liters compared to 2021 of 361.988 liters.

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 POM 2 and its supplies based (Estate B, C, Plasma 2) 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 mitigations plans to control the impact among GHG emission, such as: the right dose of fertilizer uses 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 POM 2 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	0.64	tCO ₂ e/tProduct	Oil palm planted on mineral soil	19852.17	Ha
PK	0.64	tCO ₂ e/tProduct	Oil palm planted area on peat	0.00	Ha
PKO	0.00	tCO ₂ e/tProduct	Total oil palm planted area	19852.17	Ha
PKE	0.00	tCO ₂ e/tProduct	Conservation area (Forested)	6387.26	Ha
OER	22.52	%	Conservation area (non-Forested)	0.00	Ha
KER	3.21	%	FFB Production per hectare	28.62	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	89124.08	0.19	PK from own mill	0.00
Fuel Consumption	200.68	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 Emissions	Crusher	0.00
Sale of PKS	0.00	0.00			
Sale of EFB	0.00	0.00			
Total	89324.76	0.19			

Estate / Plantation Field Emissions and Sinks

Description	Emission (tCO2e)			TOTAL
	Own	Group	3rd Party	
Emission Source				
Land Conversion	171086.49	0.00	0.00	171086.49
CO2 Emissions from Fertilizer	13281.04	0.00	0.00	13281.04
N2O Emissions from Peat	0.00	0.00	0.00	0.00
N2O Emissions from Fertilizer	9951.04	0.00	0.00	9951.04
Fuel Consumption	8021.98	0.00	0.00	8021.98
Peat Oxidation	0.00	0.00	0.00	0.00
Sinks				
Crop Sequestration	-160237.82	0.00	0.00	-160237.82
Sequestration in Conservation Area	-51970.98	0.00	0.00	-51970.98
Total	-9868.25	0.00	0.00	-9868.25

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*

7.10.2

PT BIA do not conduct any new development since 2018. so current company net GHG Emission has been described on indicator 7.10.1.

The company has conducted a carbon stock assessment conducted in February 2018 by Aksenta Consultants. The study was conducted in the HGU area of PT BIA with an area of 34,255.2 Ha. The results of the study stated that the total carbon stock in the HGU area of PT. BIA is 5,206.8 kilo ton-C with soil carbon stock as the largest contributor to total carbon stock in the HGU area of PT. BIA. The value of carbon stocks for each stratum of cover becomes one of the factors for calculating net GHG emissions which is then used as a baseline for assessing the success of mitigation practices in sustainable management of oil palm plantations. The company did not do NPP and has been sanctioned for 3 years.

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.

7.10.3

Unit 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.

Fossil fuel reducing have been implemented on POM 2 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 by a KAN accredited laboratory (LP-1342-IDN), it's covered on RKL/RPL implementation report and reported to Environmental Agency of Merauke Regency. Therefore, it can conclude that the plans to reduce or minimize the pollutants are implemented and monitored well by management.

Status: Comply

7.11

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

7.11.1

The company has issued a Decree of the Board of Directors Number: BIA/DIR/03/171221 concerning Zero Burning in which the company does not open plantations or cultivate land by burning and a Decree of the Board of Directors Number: BIA/DIR/04/171221 concerning the prohibition of clearing land by burning. This is evidenced by the SOP for Land Clearing and Preparation (SOP/KBN/01) which is a requirement that the company does not clear the land by burning the land.

Based on the results of field observations during the audit activity, it is known that there is no indication of land burning by the company.

7.11.2

The company shows documents for the implementation of prevention and maintenance documents for fire control facilities and infrastructure listed in the Forest and Land Fire Control Report document, Semester II of 2022, with the implementation agenda including:

- Implementation of counselling in the form of outreach and posting warnings against burning land.
- Forest Fire Prevention Patrols in the form of hotspot patrols, hotspot monitoring through monitoring towers, and identification of fire-prone areas.
- Community Empowerment in the form of the formation of Emergency Response Teams, Fire Extinguisher Training, Simulation of the Use of firehoses, and Training of firefighting teams.

The company shows the reporting documents on the implementation of fire prevention and control per semester to the Merauke District Horticulture and Plantation Office, which are listed in the Fire Control Report for the Semester II of 2022 period; the document handover date is February 14, 2023. In summary, the points listed in the report, such as the presence or absence of fire incidents, prevention activities, and others.

Based on the results of interviews with the Merauke District Horticulture and Plantation Office, it is known that there were no fire incidents in and around the company, training and prevention activities had been carried out by the company, and orderly reporting had been carried out properly.

Based on the explanation above, it is known that the company has documents on the implementation of fire prevention, control, monitoring, and maintenance of facilities and infrastructure, as well as reporting.

7.11.3

The company has also involved stakeholders in adjoining locations for fire prevention and control measures by conducting socialization of land fire control to the community and employees, for example on August 23, 2022, which was attended by 84 participants. The results of interviews with community representatives from Selil and Mandekman villages revealed that the company had socialized fire control to the community. In addition, in the company area there is also a signboard prohibiting land burning activities and the dangers of land fires.

Status: Comply

7.12

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

7.12.1 and 7.12.8

As explained in previous assessment, land clearing in the PT BIA concession area began in 2012 after obtaining the HGU. In 2015 the company conducted an HCV assessment through a licensed independent team. The company has disclosed land clearing without a previous HCV assessment on 16 January 2018 and updated it in February 2020. The results of the LUCA review show that PT BIA has an obligation and must follow the RaCP process. The company can show the LUC Analysis of PT Bio Inti Agrindo's Documents carried out by PT Hijau Daun with a total area of 34,194.52 ha of Legal HGU management unit area. The report has been declared PASS by the RSPO (khing.suli@rspo.org) on August 13, 2020 with a FCL summary of 35,352.45 and Remediation of 434.21 Ha.

The company has sent the RaCP Plan to the RSPO and the RaCP plan has been received/RSPO Satisfactory according to the email from RSPO (alicia@rspo.org) on 21 July 2021 stating that the Satisfactory evaluation results of the compensation plan, the RaCP process for PT BIA is Now Completed.

The company shows the RaCP progress report as fulfilment of remediation and compensation obligations (Annex 9) Progress Report Year 1, which reported on 31 July 2022. The Remediation Plan is designed to restore the environmental functions of the identified riparian zones including riverbank stabilization, flood protection, filtration of chemical pollutants, reduced run-off, mitigation of soil erosion, improved water quality and benefits for biodiversity. PT. BIA's methods of remediation activities will follow Best Management Practice Guidelines for the management of river buffers and other relevant SOPs. There will be no chemical application in these areas, (e.g., chemical fertilizers and pesticides), and only manual weeding and maintenance activities will be applied near water bodies. The Remediation Areas have already been delineated and demarcated with boundary markers, and HCV signboards have been put in place.

Whereas, The Final Conservation Liability will be compensated on a "hectare-to-hectare" basis (RaCP, 2015; Compensation Option 1) through which the project will pursue the highest priority action, namely "Off-site avoided deforestation and/or avoided degradation of high-quality habitats". The proposed Project Area includes the IUCN Category IV Protected Area of Lake Bian Wildlife Reserve (LBWR) and its surrounding Buffer Zone. The Compensation Area is also located adjacent to the PT. BIA concession area, and therefore will conserve forest types similar to the vegetation that was lost during PT. BIA's concession development.

This will be accomplished through five inter-related strategic/programmatic approaches:

1. Improving the management of LBWR through a co-management approach for conservation and forest monitoring
2. Improving the welfare of the local communities through strengthening livelihoods based on sustainable natural resources management
3. Sustaining natural resources management through a conservation incentive program
4. Implementing Integrated Fire Management (IFM) in the landscape
5. Advocating for the implementation of best management practices by all stakeholders in the Landscape.

7.12.2

Consistent with the assessment of the previous period, Land clearing in the PT BIA concession area began in 2012 after obtaining the HGU. In 2015 the company conducted an HCV assessment through a licensed independent team. The HCV assessment report has been submitted to the HCV-ALS assessment team for quality review in 2016, however the results of the review have not been satisfactory/not yet received. Land clearing continued from 2016 to 2017. The improved HCV assessment report was again submitted to the HCV-ALS assessor for quality review starting from 2017 to 2019 with the final result still unsatisfactory/not received. In addition to this, the company has completed land clearing until 2018 and there are no plans to open new land in 2018 and in the years to come in the company's concession area.

Then the Company conducted a re-assessment of HCV with the independent assessor Ecologica Consultant on January 22 to May 15, 2020. In July 2020 the HCV assessment conducted by the company was approved by the HCV-ALS assessment team and was deemed satisfactory/Accepted. And because the company has not cleared new land since 2018 (15 November 2018) within its concession area, the company is not required to assess the presence of HCS (High Carbon Stock).

Based on the results of the HCV identification carried out, there are an area of 2,695 Ha in the Core (Estate A, B, and C) and 4,023.3 Ha (Plasma) consisting of HCV1, HCV2, HCV3, HCV4, HCV5 and HCV 6. calculation of the HCV area of each Estate unit, **with a total managed area of 6,718.30 Ha**. The HCV area of each estate is as follows:

- Estate A with an area of 223.28 Ha
- Plasma 1 area of 107.76 Ha
- Estate B with an area of 2,283.68 Ha
- Estate C covering an area of 2,343.2 Ha
- Plasma 2 covers an area of 1,760.37 Ha.

Based on the results of field observations, the Loo River Block 6-10 Division I and Mat River Block 3-5 Division 3 samples in Estate A found that these areas were protected by the company and there was no indication of encroachment on these HCV areas, in addition to the map of the location of the HCV areas corresponds to actual conditions.

7.12.3

Until now it is not relevant in Indonesia, so this indicator is not applicable in Indonesia until there is a further decision from the RSPO.

7.12.4

Unit of certification has an HCV program based on the recommendations from the 2020 identification assessment conducted by Ecologica Consultants in 2020. An integrated management plan has been developed in consultation with relevant stakeholders and includes directly managed areas and broader and relevant landscape level considerations. This is evidenced by the company's HCV management plan which was developed by involving stakeholders such as the surrounding village community and employees (during the 2020 HCV identification activity). Management activities planned by the company also include areas that are managed directly and take into account the wider landscape such as maintaining the existence of the Bi River and Bian Lake Wildlife Reserve which are outside the Company's HGU, anticipating land fires in the company area and in the area around the company, increasing knowledge employees and the community by conducting socialization of HCV.

The HCV program will be evaluated annually. The plan contains a plan for management, monitoring, time management and the person in charge of implementation. The HCV management matrix describes the management plan consisting of:

- Establish spray boundary markers along riverbanks and keep plants growing naturally
- Maintaining the integrity of animal habitats along river borders
- Installing warning signs for river border maintenance
- Install no hunting signboard
- Socialization of RTE species that need to be protected
- Animal patrol in HCV area
- HCV security patrol
- Application of land-based soil and water conservation, such as making terraces and rorak
- Collaboration and cooperation with the community, government and NGOs related to river conservation and protection programs.
- Enrichment of degraded riverbanks of vegetation.
- Install a boundary fence around the sacred/sacral place.

The company has not carried out a 5-year review of the management of high conservation value areas because the HCV management and monitoring plan used is the result of the recommendations from the HCV assessment conducted in 2020.

Based on the HCV management matrix above, the company carried out activities in order to maintain HCV, there are;

- Installing spray boundary stakes along riparian area and maintaining forest plants that grow naturally.
- Maintaining the integrity of animal habitats along riparian area
- Installing boards for the maintenance of riverbanks (prohibition chemical applies)
- Installing boards for hunting ban
- Conduct socialization of RTE species that need to be protected
- Conducting animal patrols in HCV areas.

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 09 January 2023 to BKSDA Papua Province.

Based on the results of field observations at Mat River which is located in Block 1-7 Division 2 Estate B, it shows that the company has protected the HCV area, such as not applying chemicals on the riverbank, patrolling the HCV area to ensure that there is no damage to the HCV area.

7.12.5

The company has identified HCV which was carried out by Ecologica Consultant on January 22 to May 15, 2020. The HCV assessment was carried out by involving the community. There is also a meeting of stakeholder representatives from the surrounding community, namely:

- On February 3, 2020 meeting with the Kindiki community,
- On February 6, 2020 meeting with the Manda community.
- On February 7, 2020 meeting with the Mandekman community.
- On February 4, 2020 meeting with the Selil community.

This is done to ensure that there is no reduction in community rights in the identified HCVs and to encourage community involvement in the maintenance and management of conservation areas.

Until the ASA 2 surveillance was carried out, based on the results of field visits to the Sacred Area for Basik-Basik clan in Area in Division 2 Block 2-24 Estate and Sago Swamp in Division 4 Estate A, the community had not visited it again, the access has also been covered by a grove of trees, management was fully carried out by the company.

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 company has a program to educate the workforce about RTE species, especially endangered species. The program is also included in the Company's HCV management plan and SOP for Management and Monitoring of High Conservation Value Areas (No. SOP/HSE/30) dated 01 August 2021. Procedures explain HCV Identification, HCV area management, HCV Area Monitoring, HCV Utilization, Reporting and Evaluation.

The procedure explains that the management of HCV areas within production areas is to: identify the presence of protected wild animals and flora (RTE) before carrying out land preparation, planting and maintenance in production areas, marking trees as habitat/nests and sources of animal food. RTE and managed animals and protected flora, installation of information and prohibition boards in HCV areas, outreach, restoring the function of river borders, and planting types of plants that are sources of food for animals, etc.

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:

- To the Community from Kelil and Mandekman Villages which was held on 12 June 2023.
- To employees from Estate A on 17 June 2023, Estate B on 16 June 2023, and Estate C on 21 March 2023.
- To Plasma members which was carried out on June 12, 13 and 17 2023.

The material presented includes;

- Existence of High Conservation Value (HCV) Areas at PT BIA.
- Prohibition of burning forests, clearing forests, spreading poison, and hunting endemic animals around the company area.
- Warnings for violations or non-compliance with the rules will receive strict sanctions in accordance with laws and company regulations.

Based on the results of interviews with residents Estate B Division 4 and spray workers in C Estate Division 2, 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

Based on Monitoring Species Report of PT Bio Inti Agrindo in 2nd semester of 2022, the results of the identification of flora and fauna including the RTE species, using the latest protection regulations, namely Permen LHK Number 106 of 2018 which are within the company's area.

- Flora: Consist of 11 type of flora, with 3 types of which are protected are; Gaharu (*Aquilaria filaria*), Bush Hitam (*Eucalyptus deglupta*), Bush Putih (*Eucalyptus pellita*).
- Fauna: Consist of 27 type of aves, 4 type of mammals, dan 9 type of reptile, with protected examples are; Kanguru Abu-abu (*Thylogale brunii*), Kuskus Selatan (*Phalanger intercastellanus*), Kuskus Totol (*Spilococus maculatus*), Kura-kura Moncong Babi (*Carettochelys insculpta*), Buaya Muara (*Crocodylus porosus*), Buaya Air Tawar (*Crocodylus novaeguineae*).

HCV monitoring is periodically evaluated by unit of certification every 5 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.

	Status: Comply	
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3.2 Conformity Checklist of Certificate and Trademark Use

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

3.3 Summary of RSPO Partial Certification.

All Management units of PT Bio Inti Agrindo (POM 1 and POM 2) plan for certification in 2020 and include in this scope of certification.

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

NCR No.	:	2022.01	Issued by	:	Rahmat Abdiansyah
Date Issued	:	06 September 2022	Time Limit	:	05 December 2022
NC Grade	:	MAJOR	Date of Closing	:	28 November 2022
Standard Ref. & Requirement	:	3.4.3 The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.			
Evidence observed (filled by auditor):					
<ul style="list-style-type: none">The company already has a Social Impact Assessment Report (SIA) of PT. Bio Inti Agrindo conducted in January 2017 to February 2017 conducted by Aksenta. From this study, there are recommendations for social management and monitoring for 2017-2019 that will be carried out by the company.In 2020, the company re-assessed the social impact and reviewed the implementation of social management and monitoring for the period 2017-2019 which was carried out by Ekologika Consultant. From the results of these studies and reviews, there are recommendations for managing social impacts for 2020-2022. The recommendations for managing social impacts are as follows<ol style="list-style-type: none">Strengthening communication and social relations with the clans of customary land owners and the community around the company with the aim of good communication between the company and the clans of customary owners and the village community.Company participation in improving human resources within the Company in cooperation with third parties through scholarship policies.Recruitment and management of local workforce.Development of CSR programs to help increase the economic independence of the community. The activities are expected to be carried out by conducting a livelihood assessment that focuses on commodity development by the community, including vulnerable communities, women and youth.Development of CSR programs to participate in improving the basic facilities of clans who own customary land, which provides convenience for companies and the community. The activities are expected to identify needs based on community proposals.Development of community plantations.The company has carried out social impact management and social impact management reviews for the 2020-2022 period which is listed in the PT BIA Social Impact Management Monitoring Report for 2020-2022, but the implementation date is unknown and evidence of the implementation of the review was carried out in a participatory manner.Based on the results of interviews with external stakeholders such as representatives of the Mandob Sejahtera Cooperative, IIsay Mandiri Cooperative, Kindiki Village, Selil Village, Mahuze Kewam and Mahuze Milafo clans, it is known that there are several social issues that are developing, for example:<ol style="list-style-type: none">Communication with the company is deemed ineffective because every complaint submitted has not been responded to by the company.Scholarships provided by the company received complaints and questions regarding the nominal scholarship provided by the company.The company's CSR program has not been based on the results of consultations and needs have not been identified with the community. This is because some of the CSR assistance provided by the company is deemed less targeted by the community.					
Non-Conformance Description (filled by auditor):					
Based on this explanation, the company has not been able to show evidence that the review of social impact management has been carried out in a participatory manner					

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

Identification of SIA will be carried out in a participatory manner in 2020. However, the annual review for 2021 – 2022 and the preparation of the CSR program have not been carried out together with the communities that own customary rights, but are carried out together with village officials during visits to the villages or during village meetings. This was because the public relations staff in charge did not know the importance of FGDs and felt that they had enough information during the visit to assess the community's wishes.

Correction *(filled by organization audited):*

- Complete evidence of participatory SIA preparation
- Convey to the Public Relations Staff regarding the importance of FGDs during the SIA review or the preparation of the SIA and CSR management plan.
- Completing the Social Impact Assessment Review with the results of meetings or deliberations with the community
- Conducting FGDs regarding the 2022 social impact review
- Conducting FGDs regarding the preparation of the 2023 CSR program

Corrective Action *(filled by organization audited):*

- Participatory SIA preparation activity report (public consultation)
- Minutes of the NCR completion meeting (submission of the importance of the FGD to Public Relations Staff)
- Report on Communication Activities with Village Communities
- Activity plan for social impact assessment activities
- SIA review FGD report for 2022 and preparation of the 2023 work plan
- FGD report on the preparation of the 2023 CSR program
- SIA Review Report 2020 – 2022
- Social Impact Management Work Plan 2023
- CSR Work Plan 2023
- Report of the internal Public Relations meeting and explanation regarding FPIC and FGD from the Sustainability team
- Public Relations Training Plan for 2023

Assessor Evaluation and Conclusion *(filled by auditor):*
Auditor Verification November 24, 2022

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

- Minutes of the NCR settlement meeting held on September 27 2022. In the minutes of the meeting, it was explained that one of the ways to convey the importance of preparing a management plan and SIA and CSR monitoring plans must be carried out in a participatory manner and attended by each clan representative and field visits not only in a few places.
- Report on the results of regular meetings with Stakeholders which were held on 20 June and 23 June 2022 which were held in Kindiki Village, Selil Village, Mandekman Village. The discussion was conducted non-formally and there were suggestions from the results of the meeting that PT BIA was expected to attend village and district level *musrenbang* so that it could find out proposals from villages.
- Minutes of the SIA review meeting, preparation of the SIA Management Plan and CSR which was carried out on 14 November 2022 which was attended by 24 Participants from representatives of the Kewan clan, Mhuze milafo, Plasma Farmers, and village officials.
- Minutes of the 2023 CSR program meeting which was held on November 14, 2022 which was attended by 24 Participants from representatives of the Kewan clan, Mhuze milafo, Plasma Farmers, and village officials. The conclusion of the meeting was to increase the scholarship quota for schoolchildren, repair of clan houses, and

requests for assistance from cooperative units.

- The 2022 SIA Review Report which was conducted on November 14, 2022 which was carried out in a participatory manner with representatives of clans and villages.
- The social impact management plan for the 2023 period which has been prepared based on the results of the 2022 social management and monitoring review which was determined by the company on November 22, 2022. The social impact management plans are as follows:
 1. Strengthening communication and social relations with clans who own customary land and the community around the company
 2. Company participation in increasing human resources in the corporate environment.
 3. Recruitment and management of local workforce
 4. Development of CSR programs to help increase the economic independence of the community.
 5. Development of a CSR program to participate in improving basic facilities for clans of customary landowners, which provide convenience for companies and communities.
 6. Development of Plasma.

Based on the 2023 Social management plan, there will be several additional activities in each program. This is because social issues as described above are still developing based on the results of the review conducted.

- The 2023 CSR Program Work Plan which was determined on November 22, 2023 based on the results of a meeting with representatives of clans and villages.
- Root cause analysis, Correction, and Corrective action. However, there are still auditor questions that must be explained by the company regarding the corrective actions taken.

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

Auditor Verification November 28, 2022

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

- Report of PT Bio Inti Agrindo's Public Relations Internal meeting which was conducted on September 28-29 2022. This activity was carried out as a corrective action by the company to provide an understanding to Public Relations staff in managing and monitoring social affairs. materials provided such as the importance of FPIC and FGD in carrying out social activities, review of SIA & CSR Programs, and preparation of annual management plans.
- The Five-year Human Resources Development T BIA Training Plan which was set for November 25 2022. The training plan includes the SIA training plan. This is done by providing training to Public Relations Staff to be able to manage and monitor social impacts as well as developing an SIA management and monitoring plan.
- Corrective action that has been corrected by the company according to the auditor's questions

Based on this evidence, the discrepancy in this indicator is stated to have been fulfilled.

Verified by	: Rahmat Abdiansyah
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NCR No.	: 2022.02	Issued by	: Sentot Adi Subandono
Date Issued	: 06 September 2022	Time Limit	: 05 December 2022
NC Grade	: MAJOR	Date of Closing	: November 28, 2022
Standard Ref. & Requirement	: 3.6.1 All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.		

Evidence observed (filled by auditor):

- The CH has identified the hazards and risks listed in the 2022 PT BIA Plantation and Mill HIRADC document which has been effective since January 2022. The document describes the risks and hazards of each activity, for example:
 1. Heavy Equipment Operations with the risk of fractures. Control measures taken are not to ride or depend on heavy equipment.
 2. FFB transportation activities with the risk of fractures, abrasions, pinching, and death. Control measures taken are not to hold on to the tailgate and not to sit on the head of the truck.
- Based on the results of observations at Estate B, it is known that there are workers / helpers who ride / sit next to the Grader operator.
- Based on observations in the residential area of Estate C, it is known that there are workers riding excavators who are moving places by sitting in the bucket and next to the excavator boom / arm.
- Based on the results of observations at Estate B (when transporting FFB to the POM) it was found that the loaders were sitting on a moving FFB truck.
- The company also has the PT BIA Plantation HIRADC document in 2022 which has been in effect since January 2022 which explains that the Rinse House Activities include storage of work tools and PPE as well as personal cleaning (bathing). However, the results of interviews with fertilizer workers in Block 41-50 Division 3 Plasma, it was found that the apron and rubber gloves were washed and stored at home. As explained by PIC Plasma, this is because the condition of the rinse house is not adequate.

Non-Conformance Description (filled by auditor):

Based on this evidence, there are company operational activities that have not been carried out in accordance with their HIRADC.

Root Cause Analysis (filled by organization audited):

1. Employees and field officers do not understand well the consequences caused by unsafe actions, besides that, supervision by supervisors or foremen in the field is not implemented properly.
2. The condition of the rinse houses that have been built are not in accordance with the specifications needed in the field.

Correction (filled by organization audited):

1. Make announcements prohibiting hitchhiking on heavy equipment
2. Make announcements prohibiting sitting on top of vehicles (trucks)
3. Adding socialization methods to employees and contractors by showing pictures/videos due to unsafe work/negligence at work
4. Making OHS warning signboards
5. Make a rinse house design that is in accordance with the specifications and needs of workers in the field
6. Propose the construction of a rinse house in accordance with a predetermined design
7. Carry out repairs to damaged rinse houses
8. Carry out inspection and data collection on the use of the rinse house and storage of PPE in the rinse house.

Corrective Action (filled by organization audited):

1. HIRA outreach to employees
2. Socialization of PPE Use
3. Socialization Announcement of the prohibition of riding on heavy equipment is posted on the notice board and conveyed to employees
4. Inspection Report on the use of the rinse house and storage of PPE in the rinse house
5. OHS Inspection Report in the Field
6. Provision of long-sleeved shirts for field employees.

Assessor Evaluation and Conclusion (filled by auditor):
Auditor Verification 24 November 2022

1. The company shows evidence of improvement as follows:
2. Socialization regarding the use of PPE and HIRADC spray power and fertilization Division 1 – 4 Plasma for the November 2022 period.
3. Announcement on September 12, 2022 prohibition of sitting on the head of a truck and hanging from the body of a car in Estate C, as well as imposing sanctions on Supervisors and Foremen if this is violated.
4. Dissemination of the prohibition of sitting on the head of a truck to all workers on 17-22 October 2022.
5. Announcement of HSE Estate B dated 17 November 2022 regarding the prohibition of operators/helpers from standing/riding on operating equipment, prohibition of sitting on top of car cabins, and speed limits.
6. HSE Estate C violation memo to HRD Estate C dated 29 September 2022 Excavator Operators and excavator passengers – putting themselves and others in dangerous conditions.
7. Dissemination of the prohibition of helpers standing on heavy equipment to all operators and Estate B helpers on 05 October 2022.
8. Rinse House Design.
9. Rinse House Inspection in Divisions 1 – 9 in November 2022.
10. Division 7 Estate B rinse house repairs on November 07, 2022.
11. SPK for the construction of Division 6 Estate B rinse houses, November 14, 2022.
12. SPK of Division 2 Plasma rinse house construction, November 10, 2022.
13. Plasma Division 3 and 4 rinse house inspection in November 2022.
14. Rinse house activities at Estate C in November 2022.
15. Long sleeve field shirt orders for Division 1 -4 plasma in September 2022.

Conclusion:

1. There are comments in Root cause analysis, please post them again.
2. Corrective action, please identify again.

Based on this, the discrepancy is declared not fulfilled.

Auditor Verification 28 November 2022

The company has made improvements to the root cause analysis and corrective actions that have been accepted, so that discrepancies are declared fulfilled and will be observed again in the next audit.

Verified by	: Sentot Adi Subandono
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NCR No.	:	2022.03	Issued by	:	Hasiholan Sihombing
Date Issued	:	05 September 2022	Time Limit	:	Next Surveillance
NC Grade	:	Minor	Date of Closing	:	22 November 2022
Standard Ref. & Requirement	:	4.2.3 The unit of certification keeps parties informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.			
Evidence observed (filled by auditor):					
<div>1. UoC showed the SOP in handling workers grievances No. SOP/SOS/08 validated on 24 March 2022 by the President Director. This policy explained that the complaints can be submitted to HRD then will be record in the complaint settlement report.</div> <div>2. Based on the field visit and the interview with the occupants in housing area, there were a grievances related to housing facilities which has been informed as a grievance to the UoC but there were no information updates related to the grievance which has been reported, for instance: The grievance related to roof leak in housing area of Division 3 and 7 in Estate B.</div>					

3. Based on the grievance record from all suggestion box in PT Bio Inti Agrindo period of 2021 to 2022, there was no grievance reported through suggestion box. In addition, based on the logbook of PT BIA internal grievance, it's known that in 2022 there was only two grievances and not related to facilities as informed during field visit.

Non-Conformance Description (filled by auditor):

UoC has not been able to show the evidence that every complaint has been documented in accordance with its procedures and informing the progress of the complaint handling to the parties.

Root Cause Analysis (filled by organization audited):

Complaints submitted by employees in the division were not conveyed to the HRD Estate due to the lack of knowledge regarding the existing reporting flow. In addition, the SOP regarding worker complaints is not appropriate due to the lack of clear information on who employees can report complaints verbally.

Correction (filled by organization audited):

- Make a revision of SOP for Handling Employee Suggestions and Complaints No. SOP/HRD/08.
- Do a socialization of the revised SOP and the flow of complaints to employees.
- Revise the flow of employee suggestions and complaints mechanism.
- Determine the person in charge of receiving complaints verbally, in writing, mobile message, email and other media in each work unit
- Recording complaints submitted in the September 2022 period and the progress of their resolution
- Record complaints and resolve complaints in accordance with predetermined SOPs.

Corrective Action (filled by organization audited):

Dissemination of the revised SOP and the flow of complaints to employees.

Assessor Evaluation and Conclusion (filled by auditor):

UoC showed the evidence of correction and corrective action as follows:

- Procedure of Handling Employee Suggestions and Complaints No. SOP/HRD/08 revision 02 which was approved by the President Director on 30 September 2022. In this document it is explained that the PIC of each department who has been appointed is responsible for making a record of every suggestion and complaint and reported to the head of the department no later than 1x24 hours. HRD is responsible for making reports and documenting complaints. Then the maximum time period for giving a response is 1 (one) week after receiving the report.
- Workers' grievance reporting flow which informs that complaint reporting can be obtained from suggestion boxes, direct mail, email, messages, as well as oral delivery.
- Socialization record of the procedures for handling employee suggestions and complaints which were carried out on 17 November 2022 in Division 9 Estate B.
- Decree regarding the Appointment of Person in Charge of Advice and Complaint Recipient for each Division in Estate B, for example: SK No. BPHNL-SK/221101-A on behalf PN (initials) appointed as the recipient of suggestions and complaints from Division 1 Estate B on 01 November 2022.
- The record of work submission No. 06/BPGEA-BAP-2022.10.28-A dated on 28 October 2022. In the document it is explained that the company handed over the construction of a housing Septic tank in Division 3 Estate A to CV MDC Bintang Bone until 31 October 2022.
- The report of damage facility submitted on 17 October 2022 by a worker on behalf of FTK (initials). In the document, it is known that the worker's complaint was the house rotted door.
- The report of hand-over work on 2 November 2022. In the document it is explained that the company submitted the door frame repair work on behalf of FTK (initials) on 2 November 2022. The company then showed a report on the completion of the work where the problems in the repair were waiting for materials to arrive and following the schedule service team work activities (so that there is a delay in resolving complaints where in the procedure it is stated that the complaint response time limit is 1 week).
- The record of complaints in the suggestion box on 1 November 2022. In the recording of complaints, there are workers' complaints regarding the company's request for an explanation where the wages for harvesting and treatment received by workers are different.

- The minutes of completion on November 4, 2022 explained that the company had socialized the wage system and work rates for harvest and care employees in response to complaints submitted in the suggestion box.

Based on the evidence of improvement that has been shown, root cause analysis, corrective action and correction action provided, the non-conformity is declared as complied.

Verified by : **Mia Rahmah Qadryani**

NCR No.	: 2022.04	Issued by	: Rahmat Abdiansyah			
Date Issued	: 06 September 2022	Time Limit	: ASA-2			
NC Grade	: Minor	Date of Closing	: 28 November 2022			
Standard Ref. & Requirement	: 4.3.1 Contributions to community development that are based on the results of consultation with local community are demonstrated.					
Evidence observed (filled by auditor): <ul style="list-style-type: none"> In the 2020 SIA study report conducted by Ekologika Consultant, there are recommendations for managing social impacts, one of which is the development of CSR programs to participate in improving the basic facilities of clans who own customary land, which provides convenience for companies and the community. The activities are expected to identify needs based on community proposals. The company already has a 2022 CSR program such as community assistance such as clan incentives, social assistance, and food aid (BAMA) which are routinely provided by the company. However, there is no evidence that the program was developed based on the results of consultations with the community. The results of the interview with the Company's PIC revealed that the company's CSR program was prepared by the company's management and was not based on the identification of community needs in the preparation of the CSR program. Based on the results of interviews with external stakeholders such as representatives of the Mandob Sejahtera Cooperative, IIsai Mandiri Cooperative, Kindiki Village, Selil Village, Mandekman Village, Mahuze Kewang and Mahuze Milafo clans, it is known that the CSR program owned by the company has not been based on the results of consultations and needs have not been identified with the community. This is because some of the CSR assistance provided by the company is deemed less targeted by the community. 						
Non-Conformance Description (filled by auditor): <p>Based on this explanation, the company has not been able to show evidence that the CSR program for community development has been carried out based on the results of consultations with local communities.</p>						
Root Cause Analysis (filled by organization audited): <p>The preparation of the CSR program has not been carried out together with the people who own customary rights, but it has been carried out together with village officials during visits to the villages or during village meetings. This is because the public relations staff who are responsible do not know the importance of FGDs and feel that they have sufficient information obtained during the visit to assess the community's wishes.</p>						
Correction (filled by organization audited): <ul style="list-style-type: none"> Complete a report on deliberation activities or results of meetings with the community Convey to the Public Relations Staff regarding the importance of FGD during the SIA review or preparation of the SIA RKT and CSR program Conducting FGDs related to the preparation of the 2023 CSR program 						

Corrective Action (filled by organization audited):

- Report on Communication Activities with Village Communities
- Minutes of the NCR completion meeting (submission of the importance of the FGD to Public Relations Staff)
- Activity Plan for 2023 CSR work plan FGD activities
- FGD report on CSR program preparation for 2023
- CSR Work Plan for 2023
- Report of the internal Public Relations meeting and explanation regarding FPIC and FGD from the Sustainability team
- Public Relations Training Plan for 2023

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification November 24, 2022

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

- Minutes of the NCR completion meeting held on September 27 2022. In the minutes of the meeting it was explained that one of the things that conveyed the importance of preparing a management plan and planning for SIA and CSR monitoring must be carried out in a participatory manner and attended by each clan representative and field visits not only in a few places.
- Report on the results of regular meetings with Stakeholders which were held on 20 June and 23 June 2022 which were held in Kindiki Village, Selil Village, Mandekman Village. The discussion was conducted non-formally and there were suggestions from the results of the meeting that PT BIA was expected to attend village and district level *musrenbang* so that it could find out proposals from villages.
- Minutes of the 2023 CSR program meeting which was held on November 14, 2022 which was attended by 24 Participants from representatives of the Kewan clan, Mahuze milafo, Plasma Farmers, and village officials. The conclusions from the meeting were the addition of school scholarship quotas, repairs to clan houses, and requests for assistance from cooperative units
- The 2023 CSR Program Work Plan which was determined on November 22, 2023 based on the results of a meeting with representatives of clans and villages. The 2023 CSR Program includes:
 1. Infrastructure → Development of village clean water facilities
 2. Education → Scholarships for clan children, assistance with school infrastructure and facilities, and assistance with other educational costs.
 3. Health → free medical treatment for the community, Posyandu and examinations for pregnant women.
 4. Social & Culture → Fuel Assistance and Social Assistance
 5. Economic empowerment → construction of production houses for handicraft products (wood, rattan, etc.), construction of production houses for the manufacture of animal feed, assistance with plant seeds (*Pinang, Rambutan, Durian*, etc.).
 6. Development of human resources → security training, capacity training for Cooperative Management HR, and Softskill Training for prospective workers.
- Root cause analysis, Correction, and Corrective action. However, there are still auditor questions that must be explained by the company regarding the corrective actions taken.

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

Auditor Verification November 28, 2022

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

- Report of PT Bio Inti Agrindo's Internal Public Relations meeting which was conducted on 28-29 September 2022. This activity was carried out as a corrective action by the company to provide an understanding to Public Relations staff in managing and monitoring social affairs. materials provided such as the importance of FPIC and FGD in carrying out social activities, review of SIA & CSR Programs, and preparation of annual management plans.
- The Five-year Human Resources Development T BIA Training Plan which was set for November 25 2022. The training plan includes a Public Relations Training plan (FPIC, and Handling issues). This is done by providing training to Public Relations staff so that they can provide an understanding of CSR and explore community needs.

- Corrective action that has been corrected by the company according to the auditor's questions

Based on this evidence, the discrepancy in this indicator is stated to have been fulfilled

Verified by : **Rahmat Abdiansyah**

NCR No.	:	2022.05	Issued by	:	Hasiholan Sihombing
Date Issued	:	06 September 2022	Time Limit	:	05 Desember 2022
NC Grade	:	MAJOR	Date of Closing	:	25 November 2022
Standard Ref. & Requirement	:	6.2.2 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			
Evidence observed (filled by auditor):					
<div>1. Based on the field visit in Plasma Division 3 Estate, there was a person on behalf of WR (initial) who was helping his spouse in loose fruit picking activity. Based on the interview with the person who's helping her spouse, it's known that she was not registered as the UoC's worker and didn't have any wok agreement wih the company.</div> <div>2. Based on the list of workers in PT BIA specifically in Plasma Division 3 Estate period of July 2022, there was no worker on behalf of WR (initial) registred as the worker in Plasma Division 3 Estate.</div> <div>3. Based on the interview with the foreman, it's known that there were still harvesting workers helped by their family who wasn't registered as the worker (aside from the one who auditor found during field visit), but during field visit the others were sick.</div>					
Reference					
<div>• Law number 13 of 2003 concerning manpower in article number 50, stated that the employment relationship occurs because of the employment agreement between the company and the worker.</div> <div>• Government Law number 35 of 2021 concerning PKWT, outsourcing, working and rest hour, and termination, stated that:<div><div>In article number 2 verse 1, stated that the employment relationship occurs because of the employment agreement between the company and the worker.</div><div>In article number 2 verse 4, stated that work agreement made for temporary period or permanent.</div></div></div>					
Non-Conformance Description (filled by auditor):					
Based on the explanation above, it's known that there was still a personnel who worked in the company's operational area without having the work agreement signed before work. This was not in accordance with the existing regulation.					
Root Cause Analysis (filled by organization audited):					
PT Bio Inti Agrindo does not justify the use of fruit picking workers. However, the harvest workers use loose fruit pickers secretly during the peak season (peak harvest) to make it easier to complete the harvest. This happens due to the lack of supervision in the field related to the use of the workforce.					
Correction (filled by organization audited):					
<div>• Warn the harvesters who bring workers who do not have work agreement.</div> <div>• Make announcements prohibiting the use of undocumented workers who do not have work agreement with PT Bio Inti Agrindo.</div> <div>• Conduct the socialization to harvest workers regarding the prohibition of working without an agreement and the risks of working without the agreement.</div>					

- Calculating the need for additional labor during peak season (peak harvest)
- Signing the agreement for additional harvest workers
- Supervise the use of manpower working in the field

Corrective Action (filled by organization audited):

- Conducting the socialization to harvest workers regarding the risks of working without agreement.
- Supervise the use of manpower working in the field

Assessor Evaluation and Conclusion (filled by auditor):
Auditor Verification on 24 November 2022

UoC showed the evidence of correction and corrective action, as follows:

- Warning Letter No. PLASMA-SP1-220920-B on 20 September 2022 for harvesting workers in division 3 plasma plantations on behalf of ML (initials). In the warning letter, it was explained that the worker received first warning letter because he brought the loose fruit workers who wasn't the company workers (no work agreement with the company).
- Announcement from the company issued on 21 September 2022 regarding the firm action to be taken by the company if there were still harvest and maintenance workers who wasn't company's workers (illegal).
- Minutes of socialization of harvesting helper prohibition in Plasma Divisions 1-4 in October 2022 which also includes the documentation of activities.
- Plans for recruiting Contract Harvesting Workers (PKWT) for the period of November 2022 plasma period for loose fruit pick workers in each division, as follows:
 - a) Division 1 currently has 79 workers, then the required number of loose fruit pickers are 40 workers.
 - b) Division 2 currently has 86 workers, then the required number of loose fruit pickers are 43 workers.
 - c) Division 3 currently has 76 workers, then the required number of loose fruit pickers are 38 workers.
 - d) Division 4 currently has 87 employees, then the required number of loose fruit pickers are 43 employees.
- Minutes of plantation inspection in November 2022 in Plasma Division 1-4. In the report it was found that the wife accompanied her husband as a harvest helper. The company then repatriates personnel who help workers and provides education on the prohibition of helping work without a work contract.
- Plasma daily worker checklist report in the first week of October (October 1 to 7 2022). The workforce checklist data is carried out every week to ensure that harvest workers who work do not bring helpers without agreement.

However, UoC hasn't been able to show these documents yet:

- The socialization record of Estate C workers as a proof that preventive action has been carried out comprehensively (not only the plasma plantations as sample plantations where non-conformances were found). The same goes for estate inspections.
- An explanation to the auditor regarding the warning letter issued to workers was issued prior to the announcement of the ban on bringing helpers to the field. Do workers who received warning letter know the rules for bringing helpers beforehand? (where the announcement was issued on 21 September 2022 while the warning letter was given on 20 September 2022).
- Explanation regarding the time plan for fulfilling the needs of the Loose Fruit Picker in Plasma workforce in each division.

Please the company complete the mentioned document according to the auditor's response. Based on the description above, the non-conformity has not been fulfilled yet.

Auditor Verification on 25 November 2022

UoC showed the additional correction documents, as follows:

- Minutes of socialization regarding the ban on working without agreement in Division 1-7 estate C on 26 September 2022 which also includes documentation of the socialization activities.
- Minutes of warning and education letters to harvesters dated on 20 September 2022 in Plasma Division 3. In the document it is explained that the company provides education to harvesters regarding the prohibition on bringing

<p>in illegal workers (without agreement) and then issues the first warning letter for workers on behalf of ML (initials) because they were caught bringing workers without agreement to help work in the field.</p> <ul style="list-style-type: none"> • An explanation from the management representative that the provision of this warning letter has been included in the CLA for the period of 2021-2023 where endangering themselves or a co-worker (it's also mean a friend who helps work) is included in a violation of the rules and this was already known to the workers. • Explanation letter regarding the request for additional workers for 6 (six) months by HRD on 25 November 2022. The document explains that the recruitment of additional workers for harvesting activities will be carried out at intervals of 6 months (November 2022-May 2023). 	
Based on additional proof of improvement provided by the company, the non-conformity has been complied.	
Verified by	Mia Rahmah Qadryani

NCR No.	:	2022.06	Issued by	:	Hasiholan Sihombing
Date Issued	:	06 September 2022	Time Limit	:	ASA-2
NC Grade	:	Minor	Date of Closing	:	22 November 2022
Standard Ref. & Requirement	:	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia			
Evidence observed (filled by auditor):					
<div>1. UoC showed the result of new mothers' need identification which was conducted in January 2022 based on the questionnaire given to 25 respondent of new mothers in Estate A, Estate B, Estate C, and Plasma. This document informed the needs of new mother, as follows: providing mother and child program (including pregnant women guidance, breastfeeding socialization, and medical check-up), providing breastfeeding comfortness to new mom by giving mattress and chair to breastfeed in daycare.</div> <div>2. Based on the interview with the management representatives and the field visit in Estate B, it is known that there were no daycare in all Divisions in Estate B due to the conversion of the building from daycare to Covid-19 quarantine room.</div> <div>3. Based on the document review of UoC's list of workers in July 2022, it is known that there were 153 female workers in Estate B. Then based on data on new mothers for the period of 2021 to 2022 in Estate B, it is known that the number of new mothers in 2021 was 3 new moms, and in 2022 were 3 new moms.</div> <div>4. UoC then showed the collaboration agreement in construction daycare building in Estate B No. 2022/08/KK/BIA/24-06 between the company and CV Doa Ibu. In the agreement, it is informed that the work agreement was effective from 23 June 2022 to 23 August 2022 (it ended when the audit was carried out). However, there was no further information regarding the construction of the daycare in Estate B.</div>					
Non-Conformance Description (filled by auditor):					
Based on the explanation above, it's known that the UoC has not been able to show the fulfillment of new mothers' need in accordance with the identification result, namely the provision of breastfeeding facility at the daycare.					
Root Cause Analysis (filled by organization audited):					
The difference in the management of daycare on the Estate is caused by the absence of a standard procedure for managing daycare. At the daycare that is available, the provision of lactation rooms has been provided in the building in the form of rooms, but not accompanied by nursing chairs or mattresses to facilitate breastfeeding, this is because the facilities have not been inspected at the daycare. The daycare building in all Divisions at Estate B was converted when Covid cases increased and there were problems with the isolation room at Estate B. After the pandemic conditions improved, the building was not repurposed like the building at the beginning because many mothers chose to hire private child caretakers.					

The construction of the TPA, which was planned to be carried out in June - August 2022, could not be continued due to problems with unavailable building materials, namely sand, where sand for the construction of buildings was imported from outside. However, due to delays in the supply of sand, the construction could not be completed optimally until the audit was carried out.

Correction (filled by organization audited):

- Determine the procedural standards regarding daycare implementation
- The daycare building which was used as a quarantine place was re-functioned as a daycare center.
- Drafting a new daycare construction contract
- Provide facilities for breastfeeding at daycare

Corrective Action (filled by organization audited):

- The socialization of daycare management procedure.
- Monitoring daycare construction.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor verification on 22 November 2022

UoC showed the evidence of correction and corrective action, as follows:

- The procedure of organizing daycare No. SOP/HRD/16 validated by the President Director on 30 September 2022. This document explained the supporting facilities that must be prepared for the daycare building, one of which is facilities for sleeping and breastfeeding such as chairs/mattresses, pillows and blankets.
- Report on daycare activities on 15 October 2022. In this document it is known that the progress of daycare reconstruction in Division IV, Division III and Division VI Estate B currently reaches 90%.
- Report of Building Inspection/Time Extension Addendum No. BGN/2022.08.24/BAP-B/30 between the company and CV Doa Ibu on 24 August 2022. In the document, it is explained that due to material constraints for the construction of the daycares in Estate B, the company issued an addendum for extending the construction time for the daycare which will begin in September 2022.
- Report on the provision of mattress at daycare on 16 November 2022 in Division III Estate B. The document is attached the documentation that the company has provided the facilities for breastfeeding.

Based on the evidence of improvement that has been shown, root cause analysis, corrective action and correction action provided, the non-conformity is declared as complied.

Verified by : **Mia Rahmah Qadryani**

NCR No.	:	2022.07	Issued by	:	Sentot Adi Subandono
Date Issued	:	06 September 2022	Time Limit	:	05 December 2022
NC Grade	:	MAJOR	Date of Closing	:	November 28, 2022
Standard Ref. & Requirement	:	6.7.3 Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.			
Evidence observed (filled by auditor):					

- The company already has PT BIA's HIRADC Plantation and Factory 2022 document which has been in effect since January 2022 which explains that the Rinse House Activities include storage of work tools and PPE as well as personal cleaning (bathing).
- The results of interviews with spray workers in Block 39-81 Division 9 Estate B, it is known that employees clean themselves (shower) after doing the spray work at home. The results of the interview with the Company's PIC revealed that workers are still cleaning themselves (bathing) at home because the condition of the rinse house is not proper.
- The results of interviews with spray workers in Block 38-57 Division 7 Estate C, it is known that employees clean themselves (shower) after doing the spray work at home.
- Observations at the Rinse House Division 5 Estate C revealed that there was 1 bathroom for 14 spray and fertilizer workers with the condition of the bathroom door not locking, partially wired walls and not completely closed.
- Observations at the Rinse House Division 3 Plasma revealed that there is only 1 bathroom for 14 spray and fertilizer workers. The results of the interview with the Company's PIC revealed that workers still clean themselves (bath) at home because the condition of the rinse house is not adequate.

Non-Conformance Description (filled by auditor):

Based on the observed evidence, the company has not been able to provide sanitation facilities for workers who use pesticides so that workers can remove PPE, clean themselves and put on their personal clothes.

Root Cause Analysis (filled by organization audited):

The condition of the rinse houses that have been built are not in accordance with the specifications required in the field and there is a lack of inspection and supervision regarding the use of the rinse houses

Correction (filled by organization audited):

1. Make a rinse house design that is in accordance with the specifications and needs of workers in the field
2. Propose the construction of a rinse house in accordance with a predetermined design
3. Carry out repairs to damaged rinse houses
4. Carry out inspection and data collection on the use of the rinse house and storage of PPE in the rinse house

Corrective Action (filled by organization audited):

Periodic inspection of the use of the rinse house, such as cleaning PPE, work tools for self-cleaning (bathing), changing personal clothes, storing PPE, and working tools.

Assessor Evaluation and Conclusion (filled by auditor):
Auditor Verification 25 November 2022

The company shows evidence of improvement as follows:

1. Division 1 – 9 Estate B rinse house inspection report in November 2022.
2. Minutes of completion of Division 7 Estate B rinse house repair work dated November 7, 2022.
3. Socialization of HIRADC Division 1 – 4 plasma in November 2022 for spray and fertilizer workers.
4. Rinse house design.
5. Report on the activities of the rinse houses of all divisions of Estate C, November 17 2022.
6. SPK of Division 6 Estate B rinse house construction on 14 November 2022, by CV BP.
7. SPK for the construction of the Plasma Division 2 rinse house on November 10, 2022, by a contractor with the initials B.
8. Report on the activities of the Plasma Division 3 and 4 Rinse House Inspection related to storage of PPE and work tools in November 2022, but there has been no inspection regarding self-cleaning (bathing) and wearing personal clothes.
9. Inspection report for storage of PPE Division 9 Estate B dated 15 November 2022 related to storage of work tools and PPE, but there has been no inspection regarding self-cleaning (bathing) and wearing personal clothing.
10. Report on the activities of the rinse house for all divisions in Estate C dated November 17 2022 regarding cleaning of PPE and working tools in the rinse house, but there has been no inspection regarding self-cleaning (bathing) and wearing personal clothes.

Conclusion:

1. There are comments in Root cause analysis, please identify them again.
2. There is a comment in Correction, please identify again.
3. Corrective action, please identify again.
4. There is an auditor's comment on the proof of repair of garlon withdrawal, please confirm.
5. Based on this, the discrepancy is declared not fulfilled.

Auditor Verification 28 November 2022:

The company has improved root cause analysis, corrections and corrective actions and has shown evidence of improvements that have been received so that non-conformities have been declared fulfilled and will be observed again in the next audit.

Verified by : **Sentot Adi Subandono**

NCR No.	: 2022.08	Issued by	: Rahmat Abdiansyah
Date Issued	: 06 September 2022	Time Limit	: ASA-2
NC Grade	: Minor	Date of Closing	: 25 November 2022
Standard Ref. & Requirement	: 7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Evidence observed (filled by auditor):			
<ul style="list-style-type: none">• The company has identified the waste generated from the factory and plantation activities. For example, the identified wastes are as follows:• Used fertilizer sacks (Plastic Fertilizer) are included in the category of used hazardous packaging.• The former thinner packaging is included in the category of packaging contaminated with hazardous waste.• Used pesticide packaging is categorized as Hazardous used packaging.• Used paint packaging is included in the category of Hazardous contaminated packaging• The used oil drum is included in the category of hazardous contaminated packaging• Domestic household waste is included in the category of Non-hazardous waste.• The SOP for handling and managing Hazardous Waste with Number SOP/HSE/20 dated December 24, 2017 explained that all hazardous waste should not be disposed of but should be handed over to companies that already have a permit. In addition, all waste generated by PT BIA's activities will be temporarily accommodated/collected in special places according to their respective types, including clinical waste. Non-hazardous waste will be sent to a collection facility for recycling and can be disposed of by dumping it in a designated final disposal site. For hazardous waste placed in the Temporary Storage of Hazardous Waste.• The results of field observations at Landfills Block 27-72 Estate B revealed that there were used drums, used oil packaging, used Tinner packaging mixed with domestic waste in the Landfills.• The results of field observations at the Employee Housing Division 3 Estate B revealed that there were 3 pieces of used paint packaging in the housing.• The results of field observations at the WWTP Pump House POM 2 found that there were used drums and used oil packaging inside the WWTP pump house.• The results of field observations at Landfills Block 36-51 Estate C revealed that there were plastic fertilizers, used pesticide packaging, and used paint packaging in the Landfills mixed with Domestic Waste.• The results of field observations in Block 41-47 Plasma 2 Division 3 revealed that there are plastic fertilizers that are not placed in the Temporary Storage of Hazardous Waste.			
Non-Conformance Description (filled by auditor):			

Based on this explanation, the company has not been able to show evidence that the waste disposal is in accordance with the procedures it has.

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

Lack of supervision of Hazardous Waste management in divisions, especially in employee housing areas and lack of education regarding the understanding of Hazardous Waste to employees and officers handling Hazardous Waste so that the segregation of waste is carried out not in accordance with the results of identification of Hazardous Waste and SOP for Hazardous Waste management.

Correction *(filled by organization audited):*

- Make announcements regarding the types of hazardous waste in households and which cannot be disposed of in landfills
- Perform hazardous waste segregation at Landfills which have already been disposed of for hazardous waste
- Outreach to waste management officers regarding the management of hazardous waste and household waste
- Fertilizer Plastic Collection Report
- Determination of person in charge of hazardous waste management in each work unit
- Collect hazardous waste that has been sorted to the nearest Hazardous Waste Temporary Storage
- Monitoring waste management activities

Corrective Action *(filled by organization audited):*

- Announcement of types of hazardous waste in households
- Hazardous Waste Socialization
- Report on the transport of hazardous waste to landfills where hazardous waste has already been disposed of
- Document of determination of responsibility for hazardous waste management in work units
- Report on collection of hazardous waste and delivery to the nearest hazardous waste temporary storage place
- Domestic waste transport reports according to the transport schedule
- Document of determination of responsibility for hazardous waste management in work units
- Supervision is carried out every month

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

Auditor Verification November 20, 2022

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

- Announcement with Number BPHSE-20221001 explaining the types of hazardous waste and their management. The announcement is available on Estate A, Estate B, Estate C, Mill and Plasma.
- Socialization of Hazardous Waste and Domestic Waste Management conducted in 9 Divisions of Estate B, Estate C and Mill. As an example of the report on the socialization of Hazardous Waste management in Estate C which was conducted on 5 November 2022 and 18-31 October 2022 in Estate B.
- Report on the results of the citation of scattered fertilizer plastic in Estate B which was conducted on November 17, 2022.
- Report on the Collection of Hazardous Waste in Landfills conducted on September 3, 2022 and proof of handing over of the Hazardous Waste to the Temporary Storage of Hazardous Waste with the type of plastic fertilizer, pesticide packaging, and paint cans.
- Report on the cleaning up of Hazardous Waste mixed with Domestic Waste in Landfills such as used drums, used tinner packaging, etc. which was carried out on September 30, 2022 and proof of handover of the Hazardous Waste to the Temporary Storage of Hazardous waste.
- Report on the transport of Fertilizer Plastic from Plasma which was carried out on September 30, 2022.
- Report on the transportation of used drums and used oil packaging from the IPAL POM 2 house and proof of handover to the Temporary Storage for Hazardous Waste.
- Residential Garbage Transportation Schedule for 2022. Based on the schedule, residential domestic waste transportation activities are carried out in a period of 3-4 days.
- Decree Number BPHNL-220825-B dated 10 October 2022 which explains the determination of the PIC/Person in Charge of Estate B Temporary Hazardous Waste Storage Site.

- Root cause analysis. Correction, and Corrective Action. However, there are still auditor records related to corrective actions taken by the company.

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

Auditor Verification November 25, 2022

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

- Decree Number BPHNL-220912J dated 12 September 2022 which explains the determination of the PIC/Person in Charge of Estate B Temporary Hazardous Waste Storage Site.
- Decree Number BPHNL-220825-C dated 25 August 2022 which explains the determination of the PIC/Person in Charge of Estate C Temporary Hazardous Waste Storage Site.
- Decree Number 001/PLASMA/KP-PPSMS/X/2022 dated 30 September 2022 which explains the determination of the PIC/Person in Charge of Temporary Storage of Plasma Hazardous Waste.
- Report on monitoring results for Hazardous and Domestic Waste for the period September and October 2022 in Estates B, C and Plasma. The results of monitoring of hazardous and domestic waste management are appropriate.
- Corrective Action that has been corrected by the company in accordance with the Auditor's Comments.

Based on the evidence submitted by the company, discrepancies in this indicator have been fulfilled and will be observed again in the next assessment.

Verified by : **Rahmat Abdiansyah**

NCR No.	:	2022.09	Issued by	:	Rahmat Abdiansyah
Date Issued	:	06 September 2022	Time Limit	:	ASA 2
NC Grade	:	Minor	Date of Closing	:	20 November 2022
Standard Ref. & Requirement	:	7.3.3 The unit of certification does not use open fire for waste disposal			
Evidence observed (filled by auditor):					
<ul style="list-style-type: none">• The SOP for Handling and Management of Hazardous and Toxic Waste Number SOP/HSE/20 dated December 24, 2017 explained that the destruction of Non-Hazardous and Toxic (Non-Hazardous) waste should not be burned because it will cause air pollution.• Based on the results of field observations at POM 2 Housing, it was found that there were 2 burn marks of domestic waste in the housing area.• Based on the results of field observations at the Plasma Division 4 Housing, there were traces of domestic waste burning in the housing area.					
Non-Conformance Description (filled by auditor):					
Based on this evidence, there is still domestic waste management by burning which is not in accordance with the procedures that have been owned by the company.					
Root Cause Analysis (filled by organization audited):					
The garbage collection schedule at employee housing is carried out once a week, before the audit was carried out there was an incident of rain during the garbage collection schedule, so that several households who felt disturbed by the amount of garbage piled up decided to burn the garbage. In Estate B landfills, the officers carried out the burning due to a lack of information regarding the prohibition of burning waste.					

Correction *(filled by organization audited):*

- Make an announcement about the prohibition of burning garbage in employee housing
- Conduct socialization on the prohibition of burning garbage to employees
- Make a garbage collection schedule at least once a week
- Carry out waste transportation to housing according to the specified schedule.

Corrective Action *(filled by organization audited):*

- Proof of the announcement of the prohibition of burning garbage is posted on notice boards and housing
- Socialization report on the ban on burning garbage in housing
- Garbage collection schedule
- Residential waste collection report.

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

Auditor Verification November 20, 2022

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

- Announcement Number HSE.PLS.03/01/10/2022 which explains the prohibition of burning activities in the Palm Oil Plantation Area and the prohibition of burning garbage in housing or where employees live which has been approved by the Manager.
- Minutes of socialization of the prohibition of burning garbage carried out in 5 Estate B Divisions, POM I and II Employees, and Plasma, for example the socialization activities were carried out on November 17 2022 at the POM II employee housing and November 1 2022 at the Plasma Division 1-4 housing.
- Waste Transportation Schedule in Estate A, Estate B, POM, and Plasma. It is known from the schedule document that the waste transportation period is carried out in a span of 3-4 days.
- Reports and documentation of waste transportation activities carried out throughout the Estate and POM. For example the garbage collection activities on 11, 13 & 15 October 2022 at POM II and Plasma Housing were carried out by the person in charge of each estate and carried out by the Sustainability Department.
- Root Cause Analysis, Correction, Corrective Action.

Based on the evidence sent by the company, discrepancies in this indicator have been fulfilled and will be observed again in the next assessment

Verified by : **Rahmat Abdiansyah**

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

NCR No.	:	2023.01	Issued by	:	Benli Manurung
Date Issued	:	24 June 2023	Time Limit	:	Next ASA
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	2.2.2 All contracts, including contracts with FFB suppliers, have separate clauses regarding the fulfillment of relevant legal obligations, and can be proven by the relevant third party.			
Evidence observed (filled by auditor): <p>Based on a review of the list of contractors as of June 2023, it is known that there are 41 contractors, for example contract number 05/BIA/SPK/2023-A dated 16 January 2023 which is valid until 01 January 2023 between PT BIA and CV. Krida Tridaya Tunggal regarding FFB Transport in Estate C. In article 5 regarding FFB Loaders it is stated that CV. Krida Tridaya Tunggal is obliged to provide loaders as needed and data on the number of loaders is made and submitted to PT BIA. Then in article 9 related to OHS it is stated that CV. Krida Tridaya Tunggal is required to register its workers to BPJS Kesehatan and BPJS Ketenagakerjaan programs.</p> <p>Then the company can show proof of compliance with the regulations carried out by CV. Krida Tridaya Tunggal, for example as follows:</p> <ul style="list-style-type: none"> • List of 6 employees on behalf of HKL, STN, NFR, ASM, ARM and SGN • Proof of payment for the worker's insurance (BPJS Kesehatan), for example proof of payment on May 16, 2023 • Proof of workers' insurance payments (BPJS Ketenagakerjaan), for example proof of payment on March 27, 2023 • Proof of payment of wages, for example wage slip for May 2023 on behalf of HKL with wages amounting to IDR 5,586,179 • Driving licenses for all FFB transport truck drivers • Contract CV. Krida Tridaya Tunggal with employees for example Contract number 003/SPK-KD/2023 dated 01 January 2023 on behalf of HKL which is valid until 01 January 2024. <p>However, based on the results of field visits and interviews with FFB drivers and loaders in blocks 33 – 51 Division I Estate C on behalf of HKL, RDT and PTS working at CV. Krida Tridaya Tunggal. Then RDT and PTS explained that they did not have a work agreement with CV. Krida Tridaya Tunggal.</p> <p>Based on the explanation above, sufficient evidence cannot be shown that all workers in the field have an employment relationship with CV. Krida Tridaya Tunggal and insurance membership (BPJS Kesehatan and BPJS Ketenagakerjaan) in accordance with article 5 and article 9 as stipulated in contract number 05/BIA/SPK/2023-A dated 16 January 2023.</p>					
Non-Conformance Description (filled by auditor): <p>The company has not been able to show sufficient evidence that all contractors have fulfilled their obligations to fulfill relevant regulations, including those related to employment relations and insurance membership (BPJS Kesehatan and BPJS Ketenagakerjaan).</p>					
Root Cause Analysis (filled by organization audited): 					
Correction (filled by organization audited): 					

Corrective Action (filled by organization audited):	
Assessor Evaluation and Conclusion (filled by auditor):	
Follow up on next audit (filled by auditor):	
Verified by	:

NCR No.	:	2023.02	Issued by	:	Afiffudin
Date Issued	:	24 June 2023	Time Limit	:	Next ASA
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	3.4.2 For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.			
Evidence observed (filled by auditor): <p>PT Bio Inti Agrindo has a social impact study and carries out a review of the implementation of social management and monitoring which has been reviewed and updated regularly, namely through the 2023 Social Impact Mitigation Activity Implementation Report document (January – May), proof of its participation to the community, for example; Kindiki Village, Selil Village, Mahuze Kewam and Mahuze Milafo Clans. Based on the results of the review document, the following programs have been managed by the company:</p> <ul style="list-style-type: none"> • Strengthening communication and social relations with clans who own customary land and communities around the company. • Company participation in improving human resources within the Company in collaboration with third parties. • Recruitment and management of local workforce. • Development of CSR programs to help increase community economic independence. • Developing a CSR program to participate in improving basic facilities for clans who own customary land, which provides convenience for companies and the community. • Development of community gardens. • Local economic development. • Improve the quality of education. • Education and improving the quality of public health. <p>However, based on the results of a review of SIA management documents, not all issues and affected stakeholders are yet contained in the document. For example, based on the results of interviews with the gender committee and housing residents in estate A, it is known that there are several social issues that are developing, related to:</p> <ul style="list-style-type: none"> • There were 5 cases of sexual harassment that occurred from 2018 – 2023. • There are complaints about the presence of wild pigs released wild in residential areas, which has an impact on domestic waste management and damaged resident's yard. 					
Non-Conformance Description (filled by auditor): <p>Based on this explanation, the company has not been able to show evidence that the review of social impact management has been carried out in a participatory manner from all affected stakeholders, for example but not limited to immigrants and contractors, broader worker representation such as local workers, gender committees, smallholders, and trade unions so it is still there are issues that have not been documented.</p>					
Root Cause Analysis (filled by organization audited):					
Correction (filled by organization audited):					
Corrective Action (filled by organization audited):					

Tindakan Korektif (dilengkapi oleh organisasi yang diaudit):	
Assessor Evaluation and Conclusion (filled by auditor):	
Follow up on next audit (filled by auditor):	
Verified by	:

NCR No.	:	2023.03	Issued by	:	Afiffudin
Date Issued	:	24 June 2023	Time Limit	:	22 September 2023
NC Grade	:	Minor raised to Major	Date of Closing	:	20 September 2023
Standard Ref. & Requirement	:	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.			
Evidence observed (filled by auditor): <p>The certification unit has the following procedures:</p> <ul style="list-style-type: none"> SOP for Handling and Management of Hazardous Waste No. SOP/HSE/20, dated 24 December 2017. The SOP explains regarding waste identification, separation according to type of waste and temporary waste storage, all hazardous waste is handed over to companies that have permission from environment agency, the officers of warehouse is responsible for reporting waste handling activities at the storage, and HSE reports all handling activities to the relevant agencies. SOP for Domestic Waste Management No. SOP/HSE/19, for domestic waste the certification unit has not carried out a sorting and reuse program, non-B3 waste is handled by stockpiling it in the designated in landfill area. <p>The company has identified waste generated from factory and plantation activities. The identified wastes are for example:</p> <ul style="list-style-type: none"> Used thinner packaging is included in the contaminated category. Used pesticide packaging is included in the used contaminated category. Used paint packaging falls into the contaminated category. Used oil drums fall into the contaminated category. Domestic household waste is included in the non-hazardous waste category <p>Based on the results of the field visit, the following was found:</p> <ul style="list-style-type: none"> Piles of domestic waste and rubbish scattered along the drainage in the Estate B Division 3 and 4 employee housing area. There are 3 units of used round-up packaging, 20 units of used oil packaging, 1 paint packaging, 20 liters of used oil in the Estate B Division 4 employee housing area. Domestic waste management at Landfill area Estate B is still mixed with B3 waste. 2 piles of household rubbish in the old barracks area and the contractor's residence and rubbish scattered along the ditch in the Estate C Division 1 employee housing area. Domestic waste management at Landfill area Estate C currently uses an open storage system and there is waste spilled around the area. Piles of household rubbish and scattered rubbish scattered along the drainage in Plasma Division 2 employee housing area. 1-unit ex-oil drum used as a water container in Plasma Division 2 employee housing area. <p>The results of interviews with residents of Estate B Division 4, Estate C Division 1, and Plasma Division 2 housing complexes show that they already know and have received socialization regarding the disposal of household waste, the prohibition on the use of used chemical packaging for domestic purposes, and the prohibition on burning</p> <p>Non-Conformance Description (filled by auditor): Deskripsi Ketidaksesuaian (dilengkapi oleh auditor): Based on this explanation, the company has not been able to show evidence that waste disposal is in accordance with its procedures.</p> <p>Root Cause Analysis (filled by organization audited):</p>					

Analisa Akar Masalah (dilengkapi oleh organisasi yang diaudit):

- Scheduled waste transportation activities are only carried out once a week, this is because there is no estimated calculation of the volume of waste produced by employees, so transportation once a week is considered sufficient. The lack of trash receptacles in residential areas also results in employees throwing rubbish in plastic or sacks, resulting in piles of rubbish and scattered rubbish.
- Employees have received socialization regarding the prohibition on using used hazardous packaging, but due to the lack of frequency of socialization, not all employees have a good understanding of the types of hazardous waste in residential areas, so other waste are still in housing.
- There is a lack of water storage facilities in several housing complexes in the division's employee settlements, so that employees who do not understand use used hazardous containers (paint buckets and drums) as containers to store water.
- There are no special hazardous waste facilities in employee housing so that even though employees have sorted from home, when transporting the waste it is still mixed together at the landfill.
- The officer responsible does not understand the regulations so he is still making landfill with an open system.

Correction (filled by organization audited):

1. Clean up rubbish in housing and drainage
2. Make hazardous waste withdrawals and hand them over to the nearest storage
3. Calculate the need for hazardous and domestic waste disposal facilities in employee housing
4. Procurement of hazardous and domestic waste bins in employee housing in accordance with calculated needs
5. Provide education on hazardous waste sorting to employees
6. Carry out waste transportation 3 times a week according to schedule
7. Conduct socialization regarding regulatory requirements for the creation of landfill
8. Carry out repairs and cleaning of landfill
9. Carry out inspections and cleanliness assessments in employee housing
10. Plan to build additional water storage tanks in housing

Corrective Action (filled by organization audited):

1. Calculation of the volume of waste generated in employee housing
2. Calculation of the need for trash facilities according to the calculation results
3. Request for procurement of hazardous and domestic waste trash cans in employee housing
4. Report on the placement of waste disposal facilities in employee housing
5. Garbage transportation schedule three times a week according to calculation results
6. Report on cleaning ditches and transporting waste
7. Hazardous waste management socialization schedule (3 times a year)
8. Report on socialization of the types of waste in housing and sorting of hazardous waste
9. Providing educational facilities (waste type banners in housing)
10. Report on installing educational signboards on hazardous and domestic waste types in employee housing
11. Hazardous waste inspection report from Housing handover to storage.
12. Report on socialization of domestic waste management and requirements for making landfill to the person in charge
13. TPSA Estate C repair report
14. Report on the creation of a new landfill area for Estate C
15. Plan to build additional water storage tanks in employee housing
16. Monitoring report on the construction of additional water storage tanks in employee housing
17. Inspection reports and cleanliness assessments in residential areas

Assessor Evaluation and Conclusion (filled by auditor):
Auditor Verification (14 September 2023)

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

- Environmental cleaning report and waste transportation schedule (3 times a week) for Estate B, C, and plasma.

- As well as making plasma water disposal sanitation in divisions 1 and 2 which will be carried out in August 2023.
- Inspection report and proof of delivery of hazardous waste from landfill area and Estate Division B, as well as Division I plasma to hazardous waste storage.
 - Calculation of waste bin requirements for the PT BIA area.
 - Material request for waste bin procurement.
 - Material requests for the provision of educational facilities in the form of socialization banners.
 - Report on the placement of waste bins in Estate B, C and plasma settlements.
 - Report on the socialization of hazardous waste sorting and the prohibition on burning waste in Estate B, C and plasma settlements.
 - Landfill area repair and cleaning reports.
 - Report on the installation of waste management educational signboards; prohibition of burning rubbish, prohibition of littering, and prohibition of the use of used hazardous waste packaging in Estates B, C, and plasma.
 - Inspection report and assessment of residential cleanliness through a clean and healthy environment competition on 01-02 September 2023, with the items looked at being environmental cleanliness and tidiness, facilities and infrastructure, socialization, and involvement and security.
 - Review report on the availability of clean water storage tanks in employee housing at Plasma Division 2.
 - Inspection report and assessment of residential cleanliness through a clean and healthy environment competition on 01-02 September 2023, with the items assessed being environmental cleanliness and tidiness, facilities and infrastructure, socialization, and involvement and security.

Based on the explanation above, there are still auditor notes that need to be completed by the Company regarding determining the root of the problem and corrective action. Thus, the discrepancy in this indicator is declared Not Fulfilled.

Auditor Verification (18 September 2023)

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

- Calculation of residential waste generation and recommendations for waste transportation in the PT Bio Inti Agrindo area
- Calculation of waste bin requirements for the PT BIA area.
- Material request for waste bin procurement.
- Report on the placement of waste bins in Estate B, C and plasma settlements.
- Waste disposal schedule for Estate B, C, and plasma (3 times a week).
- Environmental cleaning report and waste transportation schedule (3 times a week) for Estate B, C, and plasma. As well as making plasma water disposal sanitation in divisions 1 and 2 which will be carried out in August 2023.
- Schedule for outreach on household waste management and hazardous waste sorting for Estate B, C and plasma.
- Material requests for the provision of educational facilities in the form of socialization banners.
- Report on the installation of waste management educational signboards; prohibition of burning rubbish, prohibition of littering, and prohibition of the use of used hazardous waste packaging in Estates B, C, and plasma.
- Landfill area repair and cleaning reports.
- Report on the excavation of a new rubbish bin at block 33/42 in division 3 Estate C.
- Hazardous waste inspection report from Housing and landfill area and handover of hazardous waste to storage
- Report on plans to build water tank reservoirs in Estate B, C and plasma housing.
- Monitoring report on the availability of water storage tanks in employee housing in Division II Plasma.
- Inspection report and assessment of residential cleanliness through a clean and healthy environment competition on 01-02 September 2023, with the items looked at being environmental cleanliness and tidiness, facilities and infrastructure, socialization, and involvement and security.

However, there is still evidence of improvements in root cause analysis and corrective action from companies regarding the causes of waste in landfill area that is scattered and piled up. Based on the explanation above, the discrepancy in this indicator is declared Not Fulfilled.

Auditor Verification (20 September 2023)

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

- Landfill repair and cleaning reports
- Excavation report for new landfill block 33/42 in division 3 Estate C
- Socialization of waste selection and the prohibition of burning waste in the Estate B, C and Plasma residential areas.

Based on the verification results, proof of improvement has been accepted. Thus the nonconformity is declared **to have been fulfilled**.

Follow up on next audit (filled by auditor):

Verified by	:	Afiffudin
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NCR No.	:	2023.04	Issued by	:	Afiffudin
Date Issued	:	24 June 2023	Time Limit	:	22 September 2023
NC Grade	:	Minor raised to Major	Date of Closing	:	18 September 2023
Standard Ref. & Requirement	:	7.3.3 The unit of certification does not use open fire for waste disposal.			
Evidence observed (filled by auditor): <p>The certification unit has the following procedures:</p> <ul style="list-style-type: none"> SOP for Handling and Management of Hazardous Waste Number SOP/HSE/20 dated 24 December 2017 explains that the destruction of domestic waste must not be burned because it will cause air pollution. SOP for Control of Non- Hazardous Waste No. SOP/HSE/19, for domestic waste the certification unit has not carried out a sorting and reuse program, domestic waste is handled by stockpiling it in the designated area (landfill). Announcement No. HSE.EB 011022 dated 01 October 2022, in accordance with Directors' Decree No. BIA/DIR/28/220505 concerning OHS and Environmental Policy, where one of the points states "Prevention of Environmental Pollution", within the scope of service products, employees are prohibited from disposing of hazardous waste in TPSA, and are not permitted to carry out waste burning activities in the surrounding area. housing area. <p>Based on the results of the sample field visit, the following was found:</p> <ul style="list-style-type: none"> There is 1 domestic waste burning point in the employees housing for Estate B Division 3. There is 1 domestic waste burning point in the employees housing for Plasma Division 2. <p>Then, based on the results of interviews with residents of Estate B Division 3 dan Plasma Division 2, employee housing, it was stated that waste transportation was carried out once a week so that residents avoided the accumulation of daily waste produced by burning it after being collected in the yard.</p>					
Non-Conformance Description (filled by auditor): <p>Based on the description of the evidence above, the company has not been able to show sufficient evidence that the destruction of domestic waste is in accordance with the procedures it has.</p>					
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none"> Scheduled waste transportation activities are only carried out once a week, this is because there is no calculation of the volume of waste produced by employees, so transportation once a week is considered sufficient. The lack of trash receptacles in residential areas also results in employees throwing rubbish in plastic or sacks until it becomes a pile of rubbish and scatters and creates a smell so that employees continue to burn the rubbish 					
Correction (filled by organization audited): <ol style="list-style-type: none"> Clean up rubbish in housing. Calculate the need for waste disposal facilities in employee housing. Providing waste disposal facilities in employee housing in accordance with calculated needs. Provide education on the prohibition of burning waste. Carry out waste transportation 3 times a week according to schedule. Carry out inspections and cleanliness assessments in employee housing. 					
Corrective Action (filled by organization audited): <ol style="list-style-type: none"> Calculation of the volume of waste generated in employee housing Calculation of waste bin requirements according to waste volume calculations 					

3. Garbage transportation schedule 3 times a week according to calculation results
4. Environmental cleaning and waste transportation reports
5. Request for the provision of trash cans in employee housing
6. Report on the placement of waste disposal facilities in employee housing
7. Request for the provision of educational facilities (Prohibition on Burning Trash)
8. Report on installing educational signboards prohibiting burning rubbish in employee housing
9. Report on the socialization of the prohibition on burning waste to employees
10. Inspection reports and cleanliness assessments in residential areas

Assessor Evaluation and Conclusion (filled by auditor):
Auditor Verification (14 September 2023)

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

- Environmental cleaning report and waste disposal schedule (3 times a week) for Estate B, C, and plasma.
- Calculation of waste bin requirements for the PT BIA area.
- Material request for waste bin procurement.
- Material requests for the provision of educational facilities in the form of socialization banners.
- Report on the placement of waste bins in Estate B, C and plasma settlements.
- Report on the socialization of hazardous waste sorting and the prohibition on burning waste in Estate B, C and plasma residence area.
- Report on the installation of waste management educational signboards; prohibition of burning rubbish, prohibition of littering, and prohibition of the use of used hazardous waste packaging in Estates B, C, and plasma.
- Inspection report and assessment of residential cleanliness through a clean and healthy environment competition on 01-02 September 2023, with the items looked at being environmental cleanliness and tidiness, facilities and infrastructure, socialization, and involvement and security.

Based on the explanation above, there are still auditor notes that need to be completed by the Company regarding determining the root of the problem and corrective action. Thus, the discrepancy in this indicator is declared Not Fulfilled.

Auditor Verification (18 September 2023)

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

- Calculation of residential waste generation and recommendations for waste transportation in the PT Bio Inti Agrindo area.
- Calculation of waste bin requirements for the PT BIA area.
- Waste disposal schedule for Estate B and plasma (3 times a week).
- Report on the results of community service activities carried out at Estate B and plasma.
- Material request for waste bin procurement.
- Material requests for the provision of educational facilities in the form of socialization banners.
- Report on the placement of waste bins in Estate B and plasma settlements.
- Report on the installation of waste management educational signboards; prohibition of burning waste, prohibition of littering, and prohibition of the use of used hazardous packaging in Estate B and plasma.
- Report on the socialization of hazardous waste sorting and the prohibition on burning waste in Estate B and plasma settlements.
- Inspection report and assessment of residential cleanliness through a clean and healthy environment competition on 01-02 September 2023, with the items looked at being environmental cleanliness and tidiness, facilities and infrastructure, socialization, and involvement and security.

Based on the verification results, proof of improvement has been accepted. Thus the nonconformity is declared to **have been fulfilled**.

Follow up on next audit (filled by auditor):

Verified by	: Afiffudin

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><u>Application Land Permit and Hazardous Waste Storage</u></p> <p>The company expanded the waste water utilization area for both POM 1 and POM 2 which was carried out since the ASA 1 assessment in collaboration with consultant PT Mitra Hijau Indonesia in preparing technical studies and managing <i>Persetujuan Teknis</i> and <i>SLO</i>. Currently, the Draft Technical Study on Fulfillment of Waste Water Quality Standards (Application to Land) has been uploaded to the Ministry of Environment and Forestry online on August 13 2022.</p> <p>Until the ASA 2 assessment is carried out, the company can show the progress of obtaining permits through the preparation of a draft Technical Approval for Fulfillment of Waste Water Quality Standards for the Utilization of Waste Water for Application to Soil as Nutrients and Disposal of Waste Water to Surface Water Bodies which will be sent on April 4 2023 and onwards. in the process of improvement and finalization until now.</p> <p>For the processing of Hazardous Waste Storage Technical Details, we are still waiting for a response from the Technical Unit via Proof of Validation Event for the Ministry of Environment and Forestry Service Application which was submitted on May 29 2023.</p> <p>Based on this description, companies have the opportunity to ensure that permits are fulfilled in accordance with applicable legal obligations.</p> <p><u>Operator License/Permit</u></p> <p>The company shows the document List of Competency Certificates/OHS Licenses updated June 2023, it is known that there are certificates/licenses whose validity period has expired, such as Electrical OHS Technician licenses for 5 people in the Plantation, 12 people for Lifting Aircraft in the Plantation and Boiler Operators for 3 people at the POM 1.</p> <p>Proof of training has been shown accompanied by a certificate of having attended training from <i>PJK3</i> PT Geo Mandiri Kreasi for Operators which was carried out in June 2023, Electrical OHS Technicians in May 2023 and Lift and Transport Aircraft in June 2023.</p> <p>Companies have the opportunity to ensure that workers OHS license extensions have been fulfilled and obtain the licenses.</p>
2	3.6.1	<p>All operational activities are risk assessed to identify OHS problems. Mitigation plans and procedures are documented and implemented.</p> <p>The company has presented a hazard and risk identification document (HIRARC) for plantations and Mill which will be updated in June 2023. However, there are still activities for which the hazards and risks have not been identified, such as HCV Area Monitoring Activities and <i>HGU</i> Staking.</p> <p>Companies have the opportunity to ensure that all work activities/activities in plantations and mills have identified hazards and risks in the HIRARC document.</p>

3	6.2.4	<p>The certification unit provides adequate housing, sanitation facilities, water supplies, medical needs, education and public facilities that comply with national standards or higher standards, if public facilities are not available or inaccessible. In the case of the acquisition of non-certified units, a plan is developed that explains in detail the infrastructure improvements. Given a reasonable time (5 years) to improve infrastructure.</p> <p>Based on field visits and interviews with residents in Housing Division 3 Central Estate B, Housing Division 4 Estate B, Housing Division 4 and 5 Estate C and Housing Smallholder Division 4, it was found that the housing drainage channel was in a stagnant condition and domestic waste was in the drainage channel.</p> <p>The company has carried out repairs to several housing facilities, for example drainage improvements in accordance with the Work Implementation Minutes number 04/BPGEA-BAP-2023.03.028-A dated March 28 2023 regarding the completion of trench and terrace construction work and documentation in the form of photos of the repair results. In addition, the company shows damage identification documents, material calculations and budget for drainage construction, for example the budget for Division 3A is IDR 373,988,859.</p> <p>The company has the opportunity to carry out housing drainage improvements for all divisions in accordance with the results of damage identification and the determined budget.</p>
4	6.7.3	<p>Workers use appropriate Personal Protective Equipment (PPE), which is provided free of charge to all workers in the workplace, as protection in all operations that have the potential for danger, such as pesticide application, machine operation, land preparation and harvesting. Sanitation facilities are available for workers who use pesticides so that workers can remove PPE, clean themselves and put on their personal clothing.</p> <p>Based on the results of field observations in Divisions 3 & 4 Estate B and Plasma Division 2, it is known that the company has provided sanitation facilities (Rinse House), with 1 bathroom and a place for storing and cleaning PPE for fertilizer application and herbicide application. The company showed the design/renovation plan for the existing Rinse House building, which includes the addition of 4-bathroom units.</p> <p>Based on this explanation, the company has the opportunity to ensure that the completion of the ongoing Rinse House renovation goes as planned.</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>The certification unit has management procedures for medical waste listed in the SOP for Handling and Management of Hazardous Waste (Document No. SOP/HSE/20, dated 24 December 2017), which explains that <i>clinical waste is packaged separately and then sent to hospitals or other places that have licensed incinerator facilities.</i></p> <p>The certification unit also has a licensed waste storage in accordance with the Decree of the Head of the Merauke Regency <i>DPMP TSP</i> Service No. 04/IPL/IV/Year 2018 concerning Granting of Storage Permits for Hazardous Waste Division VII Estate C PT Bio Inti Agrindo in Ulilin District, Merauke Regency. The permit explains the types of waste that may be stored, one of which is solid medical waste. Currently the permit is in the process of being processed by <i>Rintek</i>.</p> <p>From the results of field visits to clinics in Estates B and C, it is known that currently medical waste is managed by putting it in yellow infectious bags and storing it in closed medical waste bins and then sending it periodically to licensed waste managers (third party).</p>

		<p>Currently, the company is in the process of procuring cold storage and planning to place centralized medical waste at hazardous waste in Estate B.</p> <p>Based on this description, during the process of processing permits and moving storage locations, companies have the opportunity to ensure that the management of the medical waste produced is documented and implemented in accordance with applicable laws and regulations.</p>
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3.4.4. Noteworthy Positive Components

No	Description
1	Commitment to implementing the principles of sustainable palm oil plantation management.
2	The company has human resources who are competent in their respective fields.
3	Presentation of documents is quite good
4	Obtained ISPO certificate
5	Achieved Blue PROPER for the 2021 – 2022 assessment period

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Merauke District Manpower and Transmigration Office <ul style="list-style-type: none"> • CLA period 2021-2023 PT. BIA has been registered and signed by the head of the local Manpower Office. • There is a request for mediation at a tripartite meeting on June 10, 2023 regarding the reduction of electricity on hours from 15 hours to 13 hours. In this tripartite meeting there has not been a meeting point between the workers and the company so that a tripartite meeting will be mediated again. • The minimum wage system refers to the Papua Provincial Minimum Wage because the district does not set a minimum wage in 2023. • The company has provided wages to workers as regulated in the minimum wage. • All workers have been registered in the BPJS Employment and Health BPJS programs. 	<p>There are no negative issues related to the company.</p>
Department of Food Crops, Horticulture and Plantation Merauke Regency <ul style="list-style-type: none"> • The company has reported the Plantation Business Activity Report and the Fire Fighting Report on a regular basis • The company already has plasma. • There are 7 clans around the company. • The company is quite communicative and responsive to service. • There are no social issues that threaten the company's operations. 	<p>There are no negative issues related to the company.</p>
Merauke Regency Land Office <ul style="list-style-type: none"> • There are no new location permits or new HGU additions. • There is no overlap with Forest Areas • The company is quite communicative and responsive to the Land Office. • There have been no issues of land disputes in the last 1 year. 	<p>There are no negative issues related to the company.</p>
Merauke Regency Environmental Service <ul style="list-style-type: none"> • The company already has environmental documents that comply with the provisions. • Reporting on the implementation of environmental management and monitoring plans has been routinely reported by the company. The report is reported every semester. • The contents of the environmental management and monitoring report conducted by the company are in accordance with KepmenLH No 45. 	<p>There are no negative issues related to the company.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> The company already has a permit for Temporary Storage of Hazardous and Toxic Waste which complies with the provisions and the permit is still valid. Reporting on the management of hazardous material waste has been routinely reported by the company on a quarterly basis. Land disputes for the last 1 year. Currently the company is in the process of obtaining an LA permit related to the expansion of the liquid waste application area. It's just that the process is currently at the Ministry of Environment and Forestry. Routine liquid waste monitoring reports have been reported by the company. So far there has been no issue of environmental pollution by the company. <p>So far there has been no issue of land fires in the company area.</p>	
<p>Gender Committee of PT Bio Inti Agrindo Date: 19 June 2023</p> <p>The committee is formed with the management and membership of female and male employees. The committee's activities include women's empowerment and protection of gender issues in the unit of certification.</p> <p>Routine dissemination every semester regarding harassment prevention and reporting procedures as well as providing assistance if there are complaints from members/employees regarding incidents of harassment.</p> <p>Regarding reports/complaints regarding acts of harassment or regarding gender-related violations experienced by members during 2022-2023, the management and the Women's Empowerment Service and the Indonesian Child Protection Agency have been recorded and handled.</p>	<p>Has been explained on related indicators.</p>
<p>Employee Cooperative Usaha Nusantara Bersatu</p> <ul style="list-style-type: none"> The cooperative is currently engaged in selling groceries to workers and the community at PT Bio Inti Afrindo. Deed of Establishment of the Nusantara Bersatu Merauke Business Cooperative No. 38 dated 18 November 2017 by notary Rini Widayanti SH, M.Kn Letter of Recommendation for the Nusantara Bersatu Business Cooperative No. 518/371/XII/MRK/2017 from the Merauke Regency Cooperatives, Small and Medium Enterprises Service dated December 4 2017. Decree Ratifying the Deed of Establishment of the Merauke Nusantara Bersatu Business Cooperative No. 007041/BH/M.KUKM.2/II/2018 dated January 18 2018 from the Minister of Cooperatives and Small and Medium Enterprises. 	<p>There are no negative issues that need further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> The list of cooperative members as of June 2023 is 144 participants. Members' Meeting for the 2022 financial year which was held in March 2023, which was attended by 23 participants. Documents for distribution of Remaining Business Proceeds for 2022 amounting to IDR 107,705,855 can be shown. Financial Balance as of 31 December 2022 with total assets of IDR 1.49 billion. 	
Local Contractor <ul style="list-style-type: none"> PT Internusa Jaya Sejahtera (FFB Suplier) MDC Bintang Borneo (Transporter CPO/PK) CV Victory (FFB Transporter) <ul style="list-style-type: none"> Contracts are made annually Prices have been mutually agreed upon Payments are made on time All workers are covered by insurance Every worker has a contract Wages are paid according to the minimum wage PPE is provided to workers All drivers have a driving license 	<p>There are no negative issues that need further verification.</p>
Workers Union (SPSI) <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 Bi Inti Agrindo. 	<p>There are no negative issues that need further verification.</p>
Village Head of Selil Village June 19, 2023 <ul style="list-style-type: none"> Information regarding job vacancies is conveyed to the village administrator There is no environmental pollution The preparation of the CSR program has not involved village community representatives <p>There are no land disputes</p>	<p>Has been explained in the summary.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
Deputy Village Head of Kindiki Village June 19, 2023 <ul style="list-style-type: none"> • There is no environmental pollution • The preparation of the CSR program has not involved village community representatives. The assistance provided includes clean water and drilled wells • There are no land disputes <p>Information regarding job vacancies is conveyed to the village administrator</p>	<p>Has been explained in the summary.</p>
Village Head of Mandekman Village June 19, 2023 <ul style="list-style-type: none"> • There is no environmental pollution • The preparation of the CSR program has not involved village community representatives. The assistance provided includes clean water and drilled wells • There are no land disputes <p>Information regarding job vacancies is conveyed to the village administrator</p>	<p>Has been explained in the summary.</p>
Mandob Sejahtera Cooperative Ilsai Mandiri Cooperative Loo Maju Bersama Cooperative <ul style="list-style-type: none"> • Cooperation agreement for 1 cycle • Prices are published once a month by the Plantation Service • There are no complaints regarding payments • Details of operational costs have been submitted transparently • There is a pollution issue in the Isau River due to Land Application <p>Suggestion:</p> <ul style="list-style-type: none"> • If the company makes a policy to involve clan parties <p>Request that companies provide financial management training to the community</p>	<p>Has been explained in the summary.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Bio Inti Agrindo Management Representative</p>  <p><u>Bae Gyutae</u> Friday, 22 September 2023</p> </div> <div style="text-align: center;"> <p>MUTU International Lead Auditor</p>  <p><u>Hasiholan Sihombing</u> Friday, 22 September 2023</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Merauke District Manpower and Transmigration Office	Merauke Regency	-	By Phone	June 19, 2023	√	
2	Department of Food Crops, Horticulture and Plantation Merauke Regency	Merauke Regency	-	By Phone	June 21, 2023	√	
3	Merauke Regency Land Office	Merauke Regency	-	By Phone	June 19, 2023	√	
4	Merauke Regency Environmental Service	Merauke Regency	-	By Phone	June 19, 2023	√	
5	Gender Committee of PT Bio Inti Agrindo	Merauke Regency	-	Direct Interview	June 19, 2023	√	
6	Employee Cooperative Usaha Nusantara Bersatu	Merauke Regency	-	Direct Interview	June 19, 2023	√	
7	Local Contractor <ul style="list-style-type: none"> PT Internusa Jaya Sejahtera (FFB Suplier) MDC Bintang Borneo (Transporter CPO/PK) CV Victory (FFB Tranporter) 	Merauke Regency	-	Direct Interview	June 19, 2023		
8	Workers Union (SPSI)	Merauke Regency	-	Direct Interview	June 19, 2023		
9	Village Head of Selil Village	Merauke Regency	-	Direct Interview	June 19, 2023		
10	Deputy Village Head of Kindiki Village	Merauke Regency	-	Direct Interview	June 19, 2023		
11	Village Head of Mandekman Village	Merauke Regency	-	Direct Interview	June 19, 2023		
12	<ul style="list-style-type: none"> Mandob Sejahtera Cooperative Ilsai Mandiri Cooperative Loo Forward Together Cooperative 	Merauke Regency	-	Direct Interview	June 22, 2023	√	
13	POM 1 <ul style="list-style-type: none"> 2 Sterilization Operators 1 Clarification Operator 2 Boiler Operators 1 Engine Room Operator 1 POME operator 2 Warehouse Officers 3 Housing Residents 1 Generator House Officer 1 Hazardous waste temporary storage officer 2 Paramedics 	Merauke Regency	-	Direct Interview	June 20, 2023	√	
14	Estate A <ul style="list-style-type: none"> 1 Landfill Officer 1 Hazardous waste temporary storage officer 	Merauke Regency	-	Direct Interview	June 20, 2023	√	

	<ul style="list-style-type: none"> • 1 Pesticide Mixing Officer • 3 Housing Residents • 3 harvest workers • 1 Land Application worker • 2 fertilizer workers 						
15	Division 1 Plasma <ul style="list-style-type: none"> • 1 Warehouse Officer • 5 Spray Workers and 1 Foreman • 7 Fertilizer Workers and 1 Foreman • 8 Harvest Workers and 1 Foreman • 5 Housing Residents • 2 Warehouse Officers • 1 Hazardous waste temporary storage officer (transit) 	Merauke Regency	-	Direct Interview	June 20, 2023	√	
16	WWF	Jakarta	wwf-indonesia@wwf.or.id	E-mail	12 Juni 2023		√
17	WALHI	Jakarta	informasi@walhi.or.id	E-mail	12 Juni 2023		√
18	AMAN	Jakarta	rumahaman@cbn.net.id	E-mail	12 Juni 2023		√
19	Sawit Watch	Bogor	info@sawitwatch.or.id	E-mail	12 Juni 2023		√

Appendix 2. Assessment Program

DATE	17 – 25 June 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Saturday, 17 June 2023		
23:30 – 06:50	<ul style="list-style-type: none"> Jakarta → Jayapura (Garuda Indonesia GA- 656) 	HAS/AFF/BEN/ALS/RAN
Sunday, 18 June 2023		
08:15 – 09:35 10:00 – 17:00	<ul style="list-style-type: none"> Jayapura → Merauke (Garuda Indonesia GA- 658) Merauke → PT Bio Inti Agrindo 	HAS/AFF/BEN/ALS/RAN
Monday, 19 June 2023		
08:00 – 09:00	Opening meeting <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	HAS/AFF/BEN/ALS/RAN
09:00 – 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 Kutai Timur Regency by Phone Interviews with Gender Committees, Trade Unions, Local contractors, Employee cooperatives, third party suppliers (direct interview) 	AFF/HAS RAN BEN/ ALS
12:00 – 14:00	Break	HAS/AFF/BEN/ALS/RAN
14:00 – 16:00	Field observation to POM 2 <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/ HAS BEN RAN /ALS RAN /ALS
16:00 – 17:00	Presentation of Daily Progress	HAS/AFF/BEN/ALS/RAN
Wednesday, 21 June 2023		
08.00 – 12.00	Field Observation Estate C Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries) and HCV Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental Aspects, Conservation, Waste Management, Waste, LA and HCV Observation of warehouses for chemicals, fertilizers, hazardous waste warehouses, workshops, fire control facilities and worker facilities (housing, schools, religious facilities) Field Observation Plasma Divisi 2, 3 dan 4 Aspect to be verified :	AFF AFF RAN RAN

DATE	17 – 25 June 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries) and HCV Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental Aspects, Conservation, Waste Management, Waste, LA and HCV Observation of warehouses for chemicals, fertilizers, hazardous waste warehouses, workshops, fire control facilities and worker facilities (housing, schools, religious facilities) 	BEN BEN ALS/ HAS ALS/ HAS
12.00 – 14.00	Break	HAS/AFF/BEN/ALS/RAN
14.00 – 16.00	<ul style="list-style-type: none"> Document review and completing audit checklist Verification of stakeholder consultation result and field visit 	HAS/AFF/BEN/ALS/RAN
16.00 – 17.00	Presentation of Daily Progress	HAS/AFF/BEN/ALS/RAN
Thursday, 22 June 2023		
08:00 – 12:00	Field Observation Estate B Aspect to be verified : <ul style="list-style-type: none"> Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Legal Aspect (Land Ownership, Legal Boundaries) and HCV Implementation of Environmental Aspects, Conservation, Waste Management, Waste, LA and HCV Observation of warehouses for chemicals, fertilizers, hazardous waste warehouses, workshops, fire control facilities and worker facilities (housing, schools, religious facilities) 	AFF BEN/ HAS AFF RAN & ALS
12.00 – 14.00	Break	HAS/AFF/BEN/ALS/RAN
14.00 – 16.00	<ul style="list-style-type: none"> Document review and completing audit checklist Verification of stakeholder consultation result and field visit 	HAS/AFF/BEN/ALS/RAN
16.00 – 17.00	Presentation of Daily Progress	HAS/AFF/BEN/ALS/RAN
Friday, 23 June 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 	HAS/AFF/BEN/ALS/RAN
11.30 – 14.00	Break	HAS/AFF/BEN/ALS/RAN
14.00 – 16.00	<ul style="list-style-type: none"> Document review and completing audit checklist Verification of stakeholder consultation result and field visit 	HAS/AFF/BEN/ALS/RAN
16.00 – 17.00	Presentation of Daily Progress	HAS/AFF/BEN/ALS/RAN
Saturday, 24 June 2023		
08.00 – 10.00	Internal Meeting Auditor Team	HAS/AFF/BEN/ALS/RAN
10.00 – 12.00	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 	HAS/AFF/BEN/ALS/RAN
13.00 – 20.00	PT Bio Inti Agrindo → Merauke	HAS/AFF/BEN/ALS/RAN
Sunday, 25 June 2023		

DATE	17 – 25 June 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
10:30 – 16:55	<ul style="list-style-type: none"> Merauke → Jakarta (Garuda Indonesia GA- 659) 	HAS/AFF/BEN/ALS/RAN